

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

STEVEN MUSE,
c/o Justly Prudent
1140 3rd St. NE, Suite 2180,
Washington, DC 20002

Case No. 8:26-cv-460

DEMAND FOR JURY TRIAL

v.

THE MARYLAND-NATIONAL CAPITAL
PARK AND PLANNING COMMISSION,
6611 Kenilworth Avenue
Riverdale, MD 20737

Defendant.

COMPLAINT

Plaintiff Steven Muse (“Mr. Muse”), for his complaint against Defendant The Maryland-National Capital Park and Planning Commission (“M-NCPPC”), alleges the following:

1. Mr. Muse commenced this action seeking redress for the unlawful acts of race discrimination and retaliation taken against him by M-NCPPC, which resulted in the termination of his employment on February 21, 2025. Mr. Muse was the first and only African American to hold the position of Senior Park Manager in the history of M-NCPPC’s Northern Division, a distinction he earned through exemplary performance over a three-and-a-half-year tenure marked by perfect performance evaluations and zero prior discipline. His termination came less than 18 months after he opposed discriminatory hiring practices that systematically excluded Black, Hispanic, and female candidates from employment opportunities within his division.

2. Mr. Muse served M-NCPPC with distinction from June 2021 until his termination. As Senior Park Manager III, he was responsible for managing 33 parks, supervising 27 employees, and overseeing the largest land mass in Montgomery Parks. Throughout his

tenure, Mr. Muse received performance evaluations that met or exceeded expectations on every metric, and he was never subjected to any form of discipline prior to opposing discriminatory practices.

3. In September 2023, during a Northern Region management meeting attended by senior leadership, Mr. Muse spoke out against race and sex-based discriminatory hiring practices that he had witnessed firsthand. Mr. Muse observed that hiring panels in the Northern Division systematically rejected qualified candidates who resided south of the Intercounty Connector, a geographic area with a predominantly Black and Hispanic population, by using pretextual justifications such as concerns about commute times and characterizations of positions as “stepping stones.” Meanwhile, less qualified White male candidates from northern areas, including Frederick County, Pennsylvania, and West Virginia, were routinely selected. Mr. Muse subsequently submitted formal complaints to M-NCPPC’s Senior Employee/Labor Relations Specialist.

4. Within weeks of opposing these discriminatory practices, Mr. Muse began experiencing a pattern of retaliatory conduct. He was inexplicably disqualified from a promotion to Regional Operations Manager despite having successfully advanced through all prior stages of the promotional process. He was systematically excluded from management meetings, denied training opportunities that were provided to non-Black peers, and subjected to a hostile work environment in which supervisors conducted unauthorized meetings with his subordinates, thereby undermining his authority. Despite repeated written complaints to his supervisors and to Human Resources throughout 2024, M-NCPPC took no corrective action.

5. In October 2024, M-NCPPC placed Mr. Muse on administrative leave and initiated a four-month investigation into his use of a work vehicle based on GPS data—an

investigation unprecedented in the history of M-NCPPC for any manager. The investigation was triggered by a complaint from a disgruntled White male subordinate who later boasted about “burying” Mr. Muse. M-NCPPC denied Mr. Muse access to exculpatory GPS data and calibration records, mischaracterized authorized meal periods and approved remote work as policy violations, and ultimately terminated Mr. Muse’s employment on February 26, 2025. No similarly situated non-Black manager has ever been subjected to such an investigation, much less terminated based on GPS data.

6. Mr. Muse’s claims arise under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e to 2000e-17, and the laws of the State of Maryland, including the Maryland Fair Employment Practices Act, Md. Code, State Gov’t §§ 20-601 to 20-609.

JURISDICTION AND VENUE

7. The Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1343(a) because this case involves questions of federal law and because Mr. Muse seeks damages for violations of his civil rights.

8. The Court has supplemental jurisdiction over the state law claims under 28 U.S.C. § 1367 because the claims form part of the same case or controversy under Article III of the United States Constitution. The state law claims share all common operative facts with Mr. Muse’s federal law claims, and the parties are identical. Resolving Mr. Muse’s federal and state claims in a single action serves the interests of judicial economy, convenience, consistency, and fairness to the parties.

9. Venue is proper in this Court under 42 U.S.C. § 2000e-5(f)(3) because the unlawful employment practices were committed in this judicial district, the relevant employment

records are maintained in this judicial district, and there is no other judicial district that has substantial connection to Mr. Muse's claims.

THE PARTIES

10. Plaintiff Steven Muse is an African American male who was employed by M-NCPPC as a Senior Park Manager III in the Northern Division of Montgomery Parks from February 28, 2022 until his termination on February 21, 2025. Prior to his promotion to Senior Park Manager III, Mr. Muse was employed by M-NCPPC as a Park Manager II beginning on June 14, 2021. Mr. Muse was the first and only African American to hold the position of Senior Park Manager in the history of M-NCPPC's Northern Division. Mr. Muse resides in Montgomery County, Maryland.

11. Defendant The Maryland-National Capital Park and Planning Commission is a bi-county agency chartered by the State of Maryland in 1927 to acquire, develop, maintain, and administer a regional system of parks within Montgomery and Prince George's Counties, and to provide land use planning for the physical development of these counties. M-NCPPC maintains its headquarters at 6611 Kenilworth Avenue, Riverdale, Maryland 20737. At all times relevant to this Complaint, M-NCPPC employed Mr. Muse and was responsible for the employment decisions and actions described herein.

ADMINISTRATIVE PREREQUISITES

12. On or about November 13, 2025, Mr. Muse filed a Charge of Discrimination with the United States Equal Employment Opportunity Commission ("EEOC"), Charge No. 832-2026-00046, alleging that M-NCPPC had discriminated and retaliated against him on the basis of his race in violation of Title VII of the Civil Rights Act of 1964.

13. In his EEOC Charge, Mr. Muse alleged that he was subjected to discrimination and retaliation after opposing discriminatory hiring practices in September 2023, including being passed over for promotion, subjected to a hostile work environment, placed on administrative leave, and ultimately terminated from his employment on February 21, 2025.

14. On December 4, 2025, the EEOC issued Mr. Muse a Notice of Right to Sue.

15. Mr. Muse timely filed this Complaint within 90 days from the date of the Notice of Right to Sue, and therefore, he has fully complied with all prerequisites for this Court to assume jurisdiction over his Title VII claims.

BACKGROUND

16. On June 14, 2021, M-NCPPC hired Mr. Muse as a Park Manager II in the Northern Division of Montgomery Parks. Mr. Muse has previously served for several years as M-NCPPC's promotional exam proctor and promotional assessment subject matter expert.

17. After just 8 months with M-NCPPC, Mr. Muse was promoted on February 28, 2022 to the position of Senior Park Manager III, making him the first and only African American to hold that position in the history of the Northern Division.

18. As Senior Park Manager III, Mr. Muse was responsible for managing 33 parks, supervising 27 employees, and overseeing the largest land mass in Montgomery Parks.

19. Throughout his three-and-a-half-year tenure with M-NCPPC, Mr. Muse consistently received performance evaluations that met or exceeded expectations. On each performance metric, Mr. Muse received ratings of "2," indicating that he met or exceeded expectations for his position.

20. Prior to the events described herein, Mr. Muse had never been subjected to any form of discipline during his employment with M-NCPPC.

21. Mr. Muse maintained an exemplary professional record and was well-regarded by colleagues and supervisors for his dedication, competence, and leadership abilities.

22. Mr. Muse received significant recognition during his tenure with M-NCPPC, including being featured in Montgomery Parks' Black History Month 2024 video and appointments to the Montgomery Parks Diversity Committee and Management MCGEO Labor Committee. Mr. Muse also served on the Park Ranger program reinstitution committee, chaired the Northern Parks "Appreciation Day" committee, and maintained perfect attendance throughout his employment.

Mr. Muse Opposes Discriminatory Hiring Practices

23. In September 2023, Mr. Muse attended a Northern Region management meeting. Present at the meeting were Regional Operations Manager Jeff Brightwell, Acting Division Chief Mike Little, and multiple members of hiring panels within the Northern Division.

24. During the meeting, Mr. Muse spoke out against discriminatory hiring practices that he had observed within the Northern Division. Specifically, Mr. Muse stated words to the effect that "we have to stop discriminating against people because of where they live," referring to candidates who resided south of the Intercounty Connector ("ICC").

25. Mr. Muse had observed that hiring panels in the Northern Division systematically rejected qualified candidates who resided south of the ICC. The area south of the ICC has a predominantly Black and Hispanic population, and the area south of the ICC had significantly more female candidates applying relative to other areas. Panel members rejected these candidates using pretextual justifications, including claims that the candidates lived "too far" from the work location, that there would be "too much traffic" affecting their commutes, or that the candidates would treat the positions as "stepping stones" to other opportunities.

26. At the same time, Mr. Muse observed that hiring panels routinely selected less qualified White male candidates who resided in areas north of the ICC, including candidates from Frederick County, Maryland, Pennsylvania, and West Virginia—areas with significantly longer commute distances than the areas south of the ICC where minority candidates resided. Managers justified selecting lower-scoring White male candidates as a “good fit” based on farm work or seasonal employment at M-NCPPC, while rejecting higher-scoring minority candidates.

27. Mr. Muse’s observations were confirmed when a White female candidate who outscored all other candidates by double digits on the hiring assessment was passed over in favor of a much less qualified White male candidate.

28. Within days of the September 2023 management meeting, Mr. Muse contacted Kevin R. Thomas, Sr., Senior Employee/Labor Relations Specialist for M-NCPPC, by phone to formally report the discriminatory hiring practices he had opposed during the meeting. In his complaint, Mr. Muse explained he had observed a pattern by which the hiring panels used geographic residence as a proxy for race to systematically exclude Black, Hispanic, and female candidates while favoring White male candidates. Mr. Thomas assured Mr. Muse that he would “look into it.” Despite this assurance from Mr. Thomas, M-NCPPC never conducted any investigation into Mr. Muse’s discrimination complaints, and Mr. Thomas never interviewed Mr. Muse about his allegations.

Defendant Begins Retaliating against Mr. Muse

29. Within approximately two months of Mr. Muse’s opposition to discriminatory hiring practices, M-NCPPC began retaliating against him.

30. In November 2023, Mr. Muse was suddenly and without explanation disqualified from consideration for a promotion to the position of Regional Operations Manager. Prior to his

disqualification, Mr. Muse had successfully cleared all promotional matrices and had advanced to the final interview stage of the selection process. M-NCPPC provided no explanation for Mr. Muse's disqualification.

31. Throughout 2024, Mr. Muse was subjected to a hostile work environment characterized by systematic efforts to undermine his authority and exclude him from the management functions of his position. Specifically, M-NCPPC's management engaged in the following conduct: (a) excluding Mr. Muse from management meetings that he had previously attended and that were attended by his non-Black peers in similar positions; (b) denying Mr. Muse training opportunities that were provided to non-Black employees in similar positions; (c) conducting unauthorized meetings with Mr. Muse's subordinates without his knowledge or presence, thereby undermining his supervisory authority; and (d) subjecting Mr. Muse to different and more stringent disciplinary standards than those applied to non-Black managers in similar positions.

32. On multiple occasions throughout 2024, Mr. Muse's supervisors, including Regional Operations Manager Jennifer Scully, conducted meetings with Mr. Muse's subordinate employees without informing Mr. Muse or including him in those meetings. This conduct was unprecedented for a Senior Park Manager and was not directed at any non-Black manager within the Northern Division.

33. Mr. Muse repeatedly requested that Ms. Scully and Division Chief Mike Little cease conducting meetings with his subordinates without his knowledge, but his requests were ignored.

34. Throughout the period when Mr. Muse filed discrimination complaints in September 2023 through September 2024, both Mr. Little and Ms. Scully held probationary or

acting positions rather than permanent appointments. Mr. Little served as Acting Division Chief from September 2023 through October 2024, while Ms. Scully served in probationary status from her January 2024 promotion through October 2024. This probationary employment status created a structural conflict of interest, as sustained findings of discriminatory practices occurring under their supervision would jeopardize their paths to permanent appointment, reflect negatively on their probationary performance evaluations, and potentially subject them to disciplinary action. This conflict of interest became particularly significant when Mr. Little initiated the yard-wide investigation in September 2024 that led to the GPS investigation against Mr. Muse.

Mr. Muse Files Written Complaints about the Hostile Work Environment

35. In August 2024, Mr. Muse submitted written complaints to Division Chief Mike Little and Regional Operations Manager Jennifer Scully documenting the race-based hostile work environment to which he was being subjected. In his complaints, Mr. Muse detailed the pattern of exclusion, the denial of training opportunities, and the unauthorized meetings with his subordinates.

36. When Mr. Muse met with Ms. Scully to address these concerns, Ms. Scully stated she did not “trust” him and viewed his complaint as “a shot across the bow,” demonstrating retaliatory animus in the presence of HR Specialist Clara Sanders.

37. Defendant took no action in response to Mr. Muse’s August 2024 complaints. Neither Mr. Little nor Ms. Scully investigated Mr. Muse’s complaints or took any corrective measures to address the alleged race-based hostile work environment.

38. In September 2024, Mr. Muse submitted a follow-up complaint to Mr. Thomas regarding the continued retaliation and hostile work environment he was enduring. Mr. Muse

reiterated his concerns about the discriminatory treatment he was receiving and the failure of his supervisors to address his prior complaints.

39. M-NCPPC took no action in response to Mr. Muse's September 2024 complaint.

Defendant Initiates Pretextual GPS Investigation

40. On October 10, 2024, Defendant placed Mr. Muse on administrative leave and initiated an investigation into his use of a work vehicle, Vehicle #175, based on GPS tracking data.

41. The investigation was triggered by allegations made by Jackie Haines, a White male employee who was subordinate to Mr. Muse. Mr. Haines made the allegations against Mr. Muse during an unrelated personnel matter involving Mr. Haines's own conduct and management of subordinates. Mr. Haines subsequently stated to other M-NCPPC employees, and was overheard bragging around the maintenance yard, that he "made it his mission to get rid of Muse." This statement confirms that Mr. Haines's allegations against Mr. Muse were motivated by personal animus rather than legitimate workplace concerns, and that M-NCPPC's decision to credit Mr. Haines's allegations while ignoring Mr. Muse's discrimination complaints was pretextual.

42. In September 2024, Mr. Haines resigned without proper notice after an exit interview in which he explicitly criticized the management of Mr. Little and Ms. Scully. Despite this resignation and documented criticism, Mr. Little and Ms. Scully rehired Mr. Haines within 24 hours and subsequently promoted him within six months, suggesting his allegations against Mr. Muse were rewarded while Mr. Muse, who had perfect performance evaluations, was terminated.

43. Prior to Mr. Haines’s complaint, M-NCPPC’s management had repeatedly conducted meetings directly with Mr. Haines and other subordinates without going through Mr. Muse, despite Mr. Muse’s repeated requests that the chain of command be respected. This conduct undermined Mr. Muse’s authority over Mr. Haines and emboldened Mr. Haines to make allegations against Mr. Muse.

44. The GPS investigation was unprecedented in the history of M-NCPPC. Upon information and belief, no other Park Manager—Black or non-Black—had ever been subjected to a retroactive GPS investigation covering an extended period of time.

45. The GPS investigation targeted 131 alleged “unauthorized stops” at Mr. Muse’s residence during work hours over a period spanning from September 2023 through September 2024, a period that began immediately after Mr. Muse opposed discriminatory hiring practices.

46. GPS monitoring of managers is not addressed in M-NCPPC’s Merit System Rules, which govern the terms and conditions of Mr. Muse’s employment. GPS monitoring is addressed only in the MCGEO Collective Bargaining Agreement, Article 9.23, which applies to represented union employees and not to Merit System managers such as Mr. Muse. The Collective Bargaining Agreement explicitly acknowledges “perceived inaccuracies in M-NCPPC’s GPS” system and requires M-NCPPC to “meet to review any issues related to perceived inaccuracies.”

47. The MCGEO Collective Bargaining Agreement explicitly excludes meal breaks from GPS-based discipline and requires M-NCPPC to “meet to review any issues related to perceived inaccuracies in M-NCPPC’s GPS system.” M-NCPPC did not afford Mr. Muse these procedural protections.

Defendant Denies Mr. Muse Access to Exculpatory Evidence

48. Throughout the investigation, M-NCPPC denied Mr. Muse access to exculpatory evidence, including the complete GPS data and trip logs for Vehicle #175, GPS calibration records, and documentation that would have demonstrated that other employees used Vehicle #175 during certain periods when violations were alleged.

49. Defendant's Merit System Rules, Chapter 2100, Section 2132, provide employees with the right to review records and evidence relied upon in disciplinary proceedings. M-NCPPC failed to comply with these rules by denying Mr. Muse access to the GPS data underlying the allegations against him.

50. When Mr. Muse was permitted to review only 6 of the 131 alleged violations, the claimed damages dropped from \$5,458.78 to \$3,000.00, a reduction of nearly fifty percent. This substantial reduction demonstrates fundamental flaws in M-NCPPC's investigation and the unreliability of the allegations against Mr. Muse.

51. M-NCPPC's investigation mischaracterized authorized meal periods as policy violations. M-NCPPC's Merit System Rules, Chapter 800, Section 814, explicitly provides that meal periods are excluded from work time calculations. Mr. Muse's residence is located approximately 0.6 miles from Black Hill Regional Park, which is within his management area. Mr. Muse was permitted to take meal breaks at his residence, and any stops at his residence during authorized meal periods did not constitute policy violations.

52. M-NCPPC's Department Head determined that Mr. Muse's meal period would be 45 minutes per shift. Throughout Mr. Muse's three-and-a-half-year tenure under five different Regional Operations Managers and four Division Chiefs, no supervisor ever expressed concern or imposed restrictions regarding when during Mr. Muse's workday he could take this mandatory

meal period, nor did any supervisor suggest that taking meal periods at his residence violated any policy or practice. The GPS investigation's characterization of meal periods as violations represented an unprecedented policy interpretation applied retroactively and selectively against Mr. Muse.

53. M-NCPPC's investigation also mischaracterized approved ad-hoc remote work as policy violations. Mr. Muse had received formal approval from the Division Chief to perform ad-hoc remote work from his residence. Despite this authorization, M-NCPPC treated Mr. Muse's presence at his residence during remote work periods as unauthorized absences from duty.

54. M-NCPPC excluded Mr. Muse from all personnel matters involving his staff during the investigation. This restriction was unprecedented for a Senior Manager and was not imposed on any non-Black manager under similar circumstances.

Defendant Termination Mr. Muse's Employment

55. On January 31, 2025, M-NCPPC issued Mr. Muse a Letter of Intent to Terminate his employment.

56. On February 21, 2025, M-NCPPC terminated Mr. Muse's employment. The termination occurred three days prior to his due process hearing scheduled for February 24, 2025.

57. On February 24, 2025, Mr. Muse attended a meeting with Parks Director Miti Figueredo to present his response to the proposed termination. During this meeting, Mr. Thomas, made inflammatory and unsupported statements accusing Mr. Muse of having a "personal vendetta" against Ms. Scully. Specifically, Mr. Thomas alleged that Mr. Muse "was jealous, had a personal vendetta against and didn't like, and didn't get along with Jennifer Scully" because Scully was promoted over Mr. Muse. This characterization was demonstrably false, as

employment records show that Mr. Muse had competed directly with Ms. Scully for the Senior Park Manager III position in February 2022 and that Mr. Muse was selected over her, establishing his superior qualifications for the role. Mr. Thomas made these accusations without conducting any investigation into Mr. Muse's discrimination and hostile work environment complaints.

58. M-NCPPC changed Mr. Muse's termination from February 21, 2025 to February 26, 2025. Upon information and belief, M-NCPPC arbitrarily changed the termination date to create the false appearance that the decision to terminate Mr. Muse's employment occurred after the February 24th hearing in an effort to reflect that M-NCPPC considered his responses. In the Notice of Dismissal, Parks Director Miti Figueredo stated that she had "carefully considered" Mr. Muse's testimony and information but "determined [his] responses do not merit further consideration."

59. M-NCPPC also demanded that Mr. Muse reimburse M-NCPPC in the amount of \$3,000.00 for the alleged GPS violations.

60. Mr. Muse was terminated without the benefit of progressive discipline. Despite having no prior disciplinary history during his three-and-a-half-year tenure, Mr. Muse was not provided with any warnings, corrective actions, or opportunities to adjust his practices before being terminated.

Comparator Evidence

61. Upon information and belief, no similarly situated non-Black manager has ever been subjected to a retroactive GPS investigation by M-NCPPC.

62. Upon information and belief, no similarly situated non-Black manager has ever been terminated by M-NCPPC based on GPS tracking data without the benefit of progressive discipline.

63. White managers within M-NCPPC who have had documented performance issues have received coaching, counseling, and opportunities for improvement rather than immediate termination. Mr. Muse, who had no documented performance issues and a perfect disciplinary record, was terminated without any such consideration.

64. Between October 2024 and October 2025, Mr. Muse personally documented through photographs at least eight separate instances of M-NCPPC vehicles outside designated areas or during unauthorized times, the identical conduct for which Mr. Muse was terminated. These documented violations included Mr. Muse's former assigned Vehicle #175 engaging in policy violations seven months after Mr. Muse's termination. M-NCPPC possessed GPS monitoring capability for all these vehicles yet conducted no investigations and imposed no discipline, despite the violations being identical to those alleged against Mr. Muse. This selective enforcement pattern, where identical conduct by other employees was tolerated while used as grounds for Mr. Muse's termination, demonstrates the pretextual and discriminatory nature of the GPS investigation.

65. In early 2025, weeks after terminating Mr. Muse, M-NCPPC investigated David Quintanilla, a Park Manager III (Hispanic male), Ted Trey, a Park Manager II (White male), and Jimmy Morris, a Leader (White male), all from Rock Creek Park in the Northern Region, for alleged misconduct. Upon information and belief, the misconduct involved the sale of agency property and misappropriation of the proceeds. Despite the nature of these allegations, M-NCPPC offered all three managers the opportunity to retire with full benefits and in good

standing rather than terminating their employment. Upon information and belief, M-NCPPC did not require these managers to reimburse the agency for any misappropriated funds. Mr. Muse, by contrast, was terminated and required to reimburse M-NCPPC \$3,000.00 for taking authorized meal breaks at his residence located 0.6 miles from his assigned park. M-NCPPC offered retirement with benefits to non-Black managers accused of more serious misconduct while terminating the only Black Senior Park Manager in Northern Division history. The stark disparity in treatment demonstrates the discriminatory and pretextual nature of Mr. Muse's termination.

66. Willie Bodmer, a White male Park Manager I in the Storm Water Management Area, was documented by M-NCPPC's GPS system speeding while operating Vehicle #175. Vehicle #175 was the same vehicle assigned to Mr. Muse. Despite this documented GPS violation, M-NCPPC conducted no investigation into Mr. Bodmer's conduct and imposed no discipline. Mr. Bodmer remains employed by M-NCPPC. M-NCPPC's decision to terminate Mr. Muse based on GPS data while taking no action against a White manager with documented GPS violations in the same vehicle demonstrates selective enforcement based on race.

67. Dave Fisher, a White male Park Manager II at Olney Manor Recreational Park, routinely submitted vehicle logs that contained only the date and omitted required information including destinations, mileage, odometer readings, and trip purposes. M-NCPPC's Waste, Fraud & Abuse office used vehicle log documentation as part of the investigation against Mr. Muse, despite the fact that Mr. Muse maintained detailed vehicle logs with all required information filled out to specification. M-NCPPC conducted no investigation into Mr. Fisher's deficient vehicle logs and imposed no discipline. M-NCPPC scrutinized Mr. Muse's compliant

documentation while ignoring a White manager's clearly deficient documentation. The disparity in treatment further demonstrates discriminatory enforcement.

HARM CAUSED

68. As a direct and proximate result of the M-NCPPC's wrongful conduct, Mr. Muse has suffered and continues to suffer substantial harm. At the time of his termination, Mr. Muse earned an annual salary in excess of \$109,000.00, plus benefits including health insurance, retirement contributions, and paid leave. Mr. Muse has been deprived of his salary, benefits, and other incidents of employment since his termination on February 21, 2025, which M-NCPPC later changed to February 26, 2025.

69. Mr. Muse has lost opportunities for career advancement, including the promotion to Regional Operations Manager for which he was qualified and from which he was wrongfully disqualified in November 2023. Mr. Muse's termination has damaged his professional reputation and will negatively impact his ability to secure comparable employment in his field.

70. M-NCPPC's demand that Mr. Muse reimburse M-NCPPC in the amount of \$3,000.00 for alleged GPS violations has caused Mr. Muse additional financial harm and distress.

71. Mr. Muse has suffered and continues to suffer severe emotional distress, mental anguish, and humiliation as a result of M-NCPPC's unlawful conduct. The stress of enduring a race-based hostile work environment, being subjected to an unprecedented and pretextual investigation, and ultimately losing his career has taken a significant toll on Mr. Muse's mental and physical health.

72. Mr. Muse has experienced stress-related health conditions, including hypertension and chronic migraines, which have required medical treatment. Mr. Muse has also required

mental health treatment to address the anxiety, depression, and emotional trauma caused by M-NCPPC's conduct.

73. Mr. Muse has incurred and will continue to incur medical expenses for treatment of the physical and mental health conditions caused by M-NCPPC's unlawful conduct.

74. Mr. Muse's termination has caused him embarrassment and reputational harm within his professional community. Mr. Muse dedicated nearly four years of his career to M-NCPPC and achieved the historic distinction of becoming the first and only African American Senior Park Manager in the Northern Division's history. M-NCPPC's termination of Mr. Muse under false pretenses has tarnished his professional legacy and standing.

75. M-NCPPC's conduct has deprived Mr. Muse of the dignity, respect, and fair treatment to which he was entitled as an employee. Mr. Muse was punished for doing what the law requires—opposing discrimination in the workplace—and was subjected to differential treatment because of his race.

76. Mr. Muse has been forced to expend significant time, effort, and resources pursuing administrative remedies and this litigation to vindicate his rights under federal and state law.

COUNT I

Unlawful Retaliation in Violation of Title VII of the Civil Rights Act of 1964

77. Mr. Muse incorporates herein the allegations set forth in paragraphs 1 through 76, above.

78. Title VII of the Civil Rights Act of 1964, as amended, prohibits employers from retaliating against employees who engage in certain protected activities, which include opposing race-based discriminatory practices or participating in proceedings related to complaints of discrimination based on race, color, religion, sex, or national origin.

79. Mr. Muse engaged in protected activity under Title VII when, in September 2023, he opposed discriminatory hiring practices at a Northern Region management meeting by stating that the division needed to stop discriminating against candidates based on where they lived. Mr. Muse reasonably believed that the hiring practices he opposed constituted unlawful discrimination on the basis of race, national origin, and sex.

80. Mr. Muse engaged in additional protected activity when he: (a) submitted formal complaints regarding the discriminatory hiring practices to Kevin R. Thomas, Sr., Senior Employee/Labor Relations Specialist, in September 2023; (b) submitted written complaints to Division Chief Mike Little and Regional Operations Manager Jennifer Scully in August 2024, documenting the hostile work environment and retaliatory treatment to which he was being subjected; and (c) submitted a follow-up complaint to Kevin R. Thomas, Sr. in September 2024 regarding the continued retaliation and hostile work environment.

81. M-NCPPC subjected Mr. Muse to materially adverse employment actions following his protected activity, including: (a) disqualifying Mr. Muse from consideration for promotion to Regional Operations Manager in November 2023, approximately two months after he opposed discriminatory hiring practices; (b) excluding Mr. Muse from management meetings throughout 2024; (c) denying Mr. Muse training opportunities that were provided to non-Black peers throughout 2024; (d) conducting unauthorized meetings with Mr. Muse's subordinates without his knowledge throughout 2024, thereby undermining his supervisory authority; (e) subjecting Mr. Muse to heightened scrutiny and different disciplinary standards than those applied to non-Black managers; (f) placing Mr. Muse on administrative leave on October 10, 2024; (g) initiating an unprecedented GPS investigation targeting 131 alleged violations over a period beginning immediately after Mr. Muse's protected activity; (h) denying Mr. Muse access

to exculpatory evidence during the investigation; (i) terminating Mr. Muse's employment on February 21, 2025; and (j) demanding that Mr. Muse reimburse M-NCPPC \$3,000.00 for alleged violations.

82. The adverse employment actions taken against Mr. Muse were materially adverse because they would dissuade a reasonable employee from engaging in activity protected under Title VII.

83. There is a causal connection between Mr. Muse's protected activity and the adverse employment actions taken against him. The temporal proximity between Mr. Muse's opposition to discriminatory hiring practices in September 2023 and the commencement of retaliatory conduct in November 2023 supports an inference of causation. The GPS investigation targeted a period beginning in September 2023, the same month Mr. Muse engaged in protected activity, further demonstrating the causal link.

84. The causal connection is further established by the pattern of escalating retaliation following each instance of protected activity. Mr. Muse was disqualified from promotion shortly after opposing discrimination in September 2023. The hostile work environment intensified after his written complaints in August 2024. And the GPS investigation was initiated within weeks of his follow-up complaint in September 2024.

85. M-NCPPC's proffered reasons for the adverse employment actions are pretextual. The GPS investigation was unprecedented, procedurally flawed, and based on mischaracterizations of authorized conduct. No similarly situated non-Black manager has been subjected to such treatment. The investigation was initiated by a disgruntled subordinate who boasted about "burying" Mr. Muse, and M-NCPPC failed to investigate Mr. Muse's complaints of discrimination and retaliation while crediting unfounded allegations against him.

86. The true reason for the adverse employment actions taken by M-NCPPC was Mr. Muse's opposition to discriminatory hiring practices and his complaints about the hostile work environment and retaliation to which he was subjected.

87. M-NCPPC acted with malice or reckless indifference to Mr. Muse's federally protected rights. M-NCPPC was aware of Mr. Muse's protected activity, received multiple complaints from Mr. Muse regarding discrimination and retaliation, and nonetheless continued and escalated its retaliatory conduct, culminating in Mr. Muse's termination.

88. As a direct and proximate result of M-NCPPC's unlawful retaliation, Mr. Muse has suffered and continues to suffer substantial harm.

COUNT II

Unlawful Discrimination in Violation of Title VII of the Civil Rights Act of 1964

89. Mr. Muse incorporates herein the allegations set forth in paragraphs 1 through 76, above.

90. Title VII of the Civil Rights Act of 1964, as amended, prohibits employers from discriminating against employees on the basis of race, color, religion, sex, or national origin with respect to compensation, terms, conditions, or privileges of employment.

91. Mr. Muse is African American and is a member of a protected class under Title VII.

92. Mr. Muse was qualified for his position as Senior Park Manager III and performed his job in a manner that met or exceeded M-NCPPC's legitimate expectations. Throughout his tenure, Mr. Muse received performance evaluations rating him as meeting or exceeding expectations on every metric. He had no prior disciplinary history. He successfully managed 33 parks, supervised 27 employees, and oversaw the largest land mass in Montgomery Parks.

93. Mr. Muse was the first and only African American to hold the position of Senior Park Manager in the history of M-NCPPC's Northern Division.

94. Defendant subjected Mr. Muse to adverse employment actions, including disqualification from promotion, exclusion from management meetings, denial of training opportunities, placement on administrative leave, subsection to an unprecedented GPS investigation, termination of employment, and a demand for reimbursement of \$3,000.00.

95. Defendant treated Mr. Muse less favorably than similarly situated employees who are not African American. Specifically: (a) upon information and belief, no non-Black manager in M-NCPPC's history has been subjected to a retroactive GPS investigation spanning more than one year and targeting over 100 alleged violations; (b) upon information and belief, no non-Black manager has been terminated based on GPS tracking data without first receiving progressive discipline, warnings, or an opportunity to correct the alleged conduct; (c) non-Black managers within M-NCPPC who have had documented performance issues have received coaching, counseling, and corrective action plans rather than immediate termination; (d) non-Black managers were not excluded from management meetings, denied training opportunities, or subjected to unauthorized meetings with their subordinates in the manner that Mr. Muse experienced; and (e) Mr. Muse, who had a perfect performance record and no prior discipline, was terminated immediately without progressive discipline, while non-Black managers with documented deficiencies were afforded opportunities to improve.

96. The circumstances of Mr. Muse's treatment give rise to an inference of race discrimination. Mr. Muse was the only African American Senior Park Manager in the Northern Division's history. He was subjected to an unprecedented investigation initiated by a white subordinate who boasted about "burying" him. Defendant credited the unfounded allegations of

this white subordinate while ignoring Mr. Muse's documented complaints of discrimination and hostile work environment.

97. Defendant's management demonstrated discriminatory animus by conducting unauthorized meetings with Mr. Muse's subordinates and by failing to investigate or address Mr. Muse's complaints of discrimination while aggressively pursuing allegations against him.

98. During the February 24, 2025 meeting regarding Mr. Muse's proposed termination, Kevin R. Thomas, Sr. accused Mr. Muse of having a "personal vendetta" against Jennifer Scully without any investigation or evidentiary basis. This inflammatory accusation, directed at an African American employee who had complained about discrimination, reflects discriminatory bias in Defendant's decision-making process.

99. Defendant's proffered reason for terminating Mr. Muse is pretextual and unworthy of credence. The GPS investigation was procedurally flawed, relied on mischaracterizations of authorized meal periods and approved remote work, denied Mr. Muse access to exculpatory evidence, and resulted in a nearly fifty percent reduction in alleged damages when Mr. Muse was permitted to review even a small portion of the underlying data.

100. GPS monitoring of managers is not addressed in M-NCPPC's Merit System Rules. The selective application of GPS monitoring standards to Mr. Muse while no similarly situated non-Black manager has been subjected to such scrutiny, demonstrates that Defendant's proffered justification is a pretext for discrimination.

101. Defendant failed to follow its own policies regarding progressive discipline. M-NCPPC's Merit System Rules contemplate progressive discipline for employee misconduct, yet Defendant terminated Mr. Muse, an employee with a superb record, without any prior warnings,

corrective actions, or opportunity to adjust his practices. This departure from standard procedures supports an inference that Defendant's true motivation was discriminatory.

102. The true reason for the adverse employment actions was Mr. Muse's race. Defendant treated Mr. Muse differently from non-Black managers, subjected him to unprecedented scrutiny, credited allegations from a white subordinate while ignoring Mr. Muse's complaints, and terminated him under circumstances that would not have resulted in termination for a non-Black employee.

103. Defendant acted with malice or reckless indifference to Mr. Muse's federally protected rights. Defendant was aware that Mr. Muse was the only African American Senior Park Manager in the Northern Division, received complaints from Mr. Muse regarding discriminatory treatment, and nonetheless subjected him to differential treatment culminating in his termination.

104. Mr. Muse's race was a motivating factor in Defendant's decision to subject him to adverse employment actions, including termination.

105. As a direct and proximate result of Defendant's unlawful race discrimination, Mr. Muse has suffered and continues to suffer substantial harm.

COUNT III
**Unlawful Retaliatory Hostile Work Environment,
in Violation of Title VII of the Civil Rights Act of 1964**

106. Mr. Muse incorporates herein the allegations set forth in paragraphs 1 through 76, above.

107. Title VII of the Civil Rights Act of 1964, as amended, prohibits employers from subjecting employees to a retaliatory hostile work environment for engaging in protected

activities, which include opposing discriminatory practices or participating in proceedings related to complaints of discrimination based on race, color, religion, sex, or national origin.

108. Mr. Muse engaged in protected activity when he opposed M-NCPPC's discriminatory hiring practices in September 2023 and when he submitted formal complaints regarding the same, as set forth in paragraphs 79 through 80, above.

109. Following Mr. Muse's protected activity, M-NCPPC subjected him to a pattern of unwelcome retaliatory conduct that, considered together under the totality of the circumstances, created a hostile work environment. This pattern of conduct included the disqualification from promotion, exclusion from management meetings, denial of training opportunities, unauthorized meetings with his subordinates that undermined his supervisory authority, application of different disciplinary standards, the refusal to address his written complaints, placement on administrative leave, the initiation of a GPS investigation targeting the period beginning with his protected activity, the denial of access to exculpatory evidence, and ultimately his termination, as more fully set forth in paragraphs 81 through 87, above.

110. Even if certain individual acts described above would not, standing alone, constitute discrete adverse employment actions, the cumulative effect of M-NCPPC's conduct was sufficiently severe and pervasive that it would dissuade a reasonable employee from engaging in protected activity. The consistent pattern of retaliatory treatment created an objectively hostile and abusive work environment for Mr. Muse.

111. Mr. Muse subjectively perceived his work environment to be hostile and abusive as a result of M-NCPPC's retaliatory conduct, as evidenced by his repeated written complaints to management in August 2024 and September 2024 describing the hostile conditions he was experiencing.

112. M-NCPPC is liable for the retaliatory conduct because the acts were carried out by Mr. Muse's supervisors, including Jennifer Scully, Mike Little, and Kevin R. Thomas, Sr., who were acting within the scope of their employment and on behalf of the agency.

113. As a direct and proximate result of M-NCPPC's retaliatory hostile work environment, Mr. Muse has suffered and continues to suffer substantial harm.

COUNT IV
Retaliation in Violation of the Maryland Fair Employment Practices Act
(Md. Code, State Gov't §§ 20-601 to 20-609)

114. Mr. Muse incorporates herein the allegations set forth in paragraphs 1 through 76, above.

115. The Maryland Fair Employment Practices Act ("MFEPa") makes it unlawful for an employer to "discriminate or retaliate against any person because the person has opposed any practice prohibited by [MFEPa], made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under [MFEPa], or exercised or enjoyed any right granted or protected by [MFEPa]." Md. Code, State Gov't § 20-606(f).

116. M-NCPPC is an "employer" within the meaning of MFEPa because it employs 15 or more employees for each working day in each of 20 or more calendar weeks in the current or preceding calendar year.

117. The allegations set forth in paragraphs 79 through 87 also establish that M-NCPPC unlawfully retaliated against Mr. Muse in violation of MFEPa.

118. As a direct and proximate result of M-NCPPC's unlawful retaliation in violation of MFEPa, Mr. Muse has suffered and continues to suffer substantial harm.

COUNT V

**Race Discrimination in Violation of the Maryland Fair Employment Practices Act
(Md. Code, State Gov't §§ 20-601 to 20-609)**

119. Mr. Muse incorporates herein the allegations set forth in paragraphs 1 through 76, above.

120. The Maryland Fair Employment Practices Act (“MFEPA”) makes it unlawful for an employer to “fail or refuse to hire, discharge, or otherwise discriminate against any individual with respect to the individual’s compensation, terms, conditions, or privileges of employment because of the individual’s race.” Md. Code, State Gov’t § 20-606(a)(1).

121. The allegations set forth in paragraphs 91 through 104 also establish that M-NCPPC unlawfully discriminated against Mr. Muse in violation of MFEPA.

122. As a direct and proximate result of M-NCPPC’s unlawful race discrimination in violation of MFEPA, Mr. Muse has suffered and continues to suffer substantial harm.

COUNT VI

Race Discrimination in Violation of Prince George’s County Code § 2-222

123. Mr. Muse incorporates herein the allegations set forth in paragraphs 1 through 76, above.

124. Under Maryland law, a person that is subjected to a discriminatory act prohibited by Prince George’s County Code or Montgomery County Code may bring and maintain a civil action against the person that committed the alleged discriminatory act for damages, injunctive relief, or other civil relief.

125. Both Prince George’s County Code and Montgomery County Code prohibit discrimination in employment based on, among other things, race.

126. The M-NCPPC is an employer within the meaning of Prince George’s County Code § 2-186(a)(8) and Montgomery County Code § 27-6.

127. The same factual allegations set forth in paragraphs 91 through 104, incorporated herein, establish that the M-NCPPC discriminated against Mr. Muse in violation of PGC Code § 2-222 and MC Code § 27-19.

128. As a direct and proximate result of the M-NCPPC's unlawful discrimination in violation of Prince George's County Code and Montgomery County Code, Mr. Muse has suffered and continues to suffer substantial harm.

COUNT VII
Retaliation in Violation of Prince George's County Code § 2-209

129. Mr. Muse incorporates herein the allegations set forth in paragraphs 1 through 76, above.

130. Prince George's County Code and Montgomery County Code prohibit an employer like M-NCPPC from retaliating against an employee who, among other things, opposes discriminatory practices in employment.

131. The same factual allegations set forth in paragraphs 79 through 87, incorporated herein, establish that the OAG retaliated against Mr. Muse in violation of PGC Code § 2-209 and MC Code § 27-19(c).

132. As a direct and proximate result of the OAG's unlawful retaliation in violation of Prince George's County Code and Montgomery County Code, Mr. Muse has suffered and continues to suffer substantial harm.

PRAYER FOR RELIEF

By reason of the foregoing, Plaintiff Steven Muse respectfully requests that the Court enter judgment on the Complaint, in his favor and against Defendant The Maryland-National Capital Park and Planning Commission, as follows:

A. Declare that M-NCPPC violated Mr. Muse's rights under Title VII of the Civil Rights Act of 1964 and the Maryland Fair Employment Practices Act by discriminating and retaliating against him on the basis of his race and in response to his opposition to unlawful employment practices;

B. Award Mr. Muse appropriate amounts of backpay, in a fair and reasonable amount to be determined at trial;

C. Award Mr. Muse an appropriate amount of front pay, or in the alternative, order M-NCPPC to reinstate Mr. Muse to his former position of Senior Park Manager III, or a substantially equivalent position, with full restoration of seniority, benefits, and other incidents of employment;

D. Award Mr. Muse compensatory damages for the harm he suffered as a result of Defendant's conduct, in fair and reasonable amount to be determined at trial;

E. Award Mr. Muse pre-judgment interest and post-judgment interest;

F. Award Mr. Muse the costs and fees he incurred in connection with this action, including reasonable attorney fees;

G. Order M-NCPPC to expunge from Mr. Muse's personnel file any and all references to the GPS investigation, the termination of his employment, and the demand for reimbursement;

H. Order M-NCPPC to rescind the demand that Mr. Muse reimburse M-NCPPC in the amount of \$3,000.00; and

I. Grant Mr. Muse such other relief as the Court deems just and proper.

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Dated: February 4, 2026

/s/ Jordan D. Howlette
JORDAN D. HOWLETTE
D. Md. Bar No.: 21634
Managing Attorney
Justly Prudent
1140 3rd St. NE, Suite 2180
Washington, DC 20002
Tel: (202) 921-6005
Fax: (202) 921-7102
jordan@justlyprudent.com
Counsel for Plaintiff