

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

SULLIVAN CAUSEY, JR.,  
c/o Justly Prudent  
1140 3rd St. NE, Suite 2180,  
Washington, DC 20002

Case No. 1:25-cv-2374

DEMAND FOR JURY TRIAL

Plaintiff,

v.

AEROTEK, INC.,  
7301 Parkway Drive  
Hanover, MD 21076

JEFF COLVIN,  
in his individual capacity,  
c/o Aerotek, Inc.  
7301 Parkway Drive  
Hanover, MD 21076

Defendants.

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**COMPLAINT**

Plaintiff Sullivan Causey Jr. (“Mr. Causey”), for his complaint against Defendants Aerotek, Inc. (“Aerotek”) and Jeff Colvin, in his individual capacity (“Defendant Colvin”), alleges the following:

1. Mr. Causey brings this action to seek redress for the unlawful acts of race discrimination and retaliation that Defendants perpetrated against him during his seventeen-year career with Aerotek. Despite being one of Aerotek’s longest-serving and most successful Black directors, Mr. Causey was subjected to differential treatment, hostility, and termination because of his race and in retaliation for his complaints about discriminatory treatment.

2. Mr. Causey was one of the first Black field directors in Aerotek's history when he was promoted to director in 2017. Throughout his tenure, he witnessed and experienced a culture where Black employees, particularly those in leadership positions, were held to different standards than their White counterparts and faced swift removal from roles for conduct that would be overlooked or minimally addressed when performed by White employees.

3. The discriminatory treatment intensified when Regional Vice President Jeff Colvin became Mr. Causey's supervisor in July 2023. From their first meeting, Defendant Colvin made clear his hostility toward Mr. Causey, publicly demeaning him about his appearance and questioning his professionalism in ways he did not treat White directors. When Mr. Causey complained to company leadership about Defendant Colvin's discriminatory conduct, Defendant Colvin retaliated by conducting a pretextual "investigation" that resulted in Mr. Causey's removal from his position despite his exemplary performance and the absence of any legitimate performance, character, or integrity issues.

4. In stark contrast, White directors under Defendant Colvin's supervision who engaged in serious misconduct—including sending inappropriate sexual images to employees and reporting to work intoxicated—remained in their positions without consequence. This differential treatment reflects a pattern of racial discrimination that has persisted throughout Aerotek's operations.

5. Mr. Causey's claims arise under Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, 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.

### **JURISDICTION AND VENUE**

6. 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. Causey seeks damages for violations of his civil rights.

7. 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. Causey's federal law claims, and the parties are identical. Resolving Plaintiff's federal and state claims in a single action serves the interests of judicial economy, convenience, consistency, and fairness to the parties.

8. Venue is proper in this judicial district under 28 U.S.C. § 1391(b) because Aerotek's principal place of business is located within this judicial district and Defendant Colvin resides and conducts business within this judicial district. Venue is further proper in this judicial district because the employment agreement between Mr. Causey and Aerotek stipulates to venue in Maryland for matters arising from Mr. Causey's employment.

### **THE PARTIES**

9. Plaintiff Sullivan Causey Jr. is an African American male who was employed by Aerotek as Director of Market Operations and Director of Recruiting Operations from 2017 until his termination in November 2024. Mr. Causey resides in Litchfield Park, Arizona.

10. Defendant Aerotek, Inc. is a Delaware corporation with its principal place of business in Hanover, Maryland. Aerotek is a staffing and workforce solutions company that operates throughout the United States, employing more than 500 individuals. Aerotek is a subsidiary of Allegis Group.

11. Defendant Jeff Colvin is and was at all relevant times Regional Vice President of the South Region for Aerotek, Inc. Defendant Colvin served as Mr. Causey's direct supervisor from July 2023 through September 2024. Defendant Colvin is sued in his individual capacity with respect to Counts III and IV of the Complaint. Upon information and belief, Defendant Colvin resides in Maryland.

### **ADMINISTRATIVE PREREQUISITES**

12. On January 9, 2025, Mr. Causey timely filed a Charge of Discrimination that alleged race-based discrimination and retaliation with the Arizona Attorney General's Office, Civil Rights Division ("Arizona Civil Rights Division") under Charge No. CRD-2025-0033. The Charge of Discrimination was considered dually filed with the Equal Employment Opportunity Commission ("EEOC") under EEOC No. 35A-2025-00188.

13. On May 21, 2025, the Arizona Civil Rights Division issued Mr. Causey a Notice of Right to Sue.

14. Mr. Causey has satisfied all administrative prerequisites to filing this action.

### **BACKGROUND**

15. In April 2007, Mr. Causey began his employment with Aerotek as a Recruiter Trainee. Mr. Causey's employment agreement with Aerotek specifically provides that Maryland law governs the employment relationship.

16. Through hard work and exceptional performance, Mr. Causey steadily advanced through various roles within the company. From 2007 to 2017, Mr. Causey served in progressively responsible positions, consistently receiving outstanding performance reviews and recognition for his contributions to the company's success. During this period, he reported to

supervisors including Stacy Putnam, Derik Fales, and Anthony Bartolucci, with whom he maintained positive working relationships and experienced no discriminatory treatment.

17. In 2017, Mr. Causey was promoted to Director of Business Operations, making him one of the first Black field directors in Aerotek's history. This promotion occurred during a time when the company had virtually no Black representation in field director positions.

18. In January 2020, as part of a company reorganization, Mr. Causey transitioned to Director of Recruiting Operations for Arizona and Director of Market Operations for Las Vegas. He worked in partnership with Derik Fales, who served as Director of Sales Operations.

19. In January 2021, Mr. Causey's responsibilities expanded to include Director of Recruiting Operations for New Mexico, Arizona, Hawaii, and El Paso, Texas, while maintaining his role as Director of Market Operations for the Las Vegas market.

20. Throughout his tenure as a director, Mr. Causey consistently demonstrated exceptional leadership and performance. In April 2023, the Causey/Fales operation was awarded recognition as the Top Growth Operation for 2022, and Mr. Causey received a Significant Impact Award from Aerotek President Tom Kelly ("President Kelly").

21. Beyond his formal job responsibilities, Mr. Causey became a leading advocate for diversity, equity, and inclusion within Aerotek. He was instrumental in creating the company's first minority community called "Strong Voices," which led to the establishment of Employee Resource Groups (ERGs), Legacy Leadership Summits, and the current DEI Council and DEI Director position. None of these initiatives were within his formal job scope, but Mr. Causey recognized their necessity for the company's growth and the advancement of underrepresented employees.

***The Failed Promotion & Discriminatory Treatment Begins***

22. In July 2023, when Anthony Bartolucci transitioned from Regional Vice President of the West Region to VP of the newly created Services Team, Mr. Causey interviewed for the backfill position of West Region Vice President. He was the only person of color to interview for the role and the only Black candidate to interview for a VP role at Aerotek in over ten years.

23. Despite his qualifications and track record of success, Mr. Causey was not selected for the position. Instead, the role was given to John Paulsen, a White male who was college roommates and close friends with Anthony Bartolucci. Paulsen's primary experience was from Aerotek's sister company, Tek Systems, in the IT staffing industry rather than Aerotek's core business.

24. Following this organizational change, Mr. Causey's operation was moved from the West Region to the South Region under the leadership of Regional Vice President Jeff Colvin in late July/early August 2023. As the Aerotek's Regional Vice President, Defendant Colvin was empowered to make significant employment decisions such as hiring, firing, disciplining, and promoting.

***Defendant Colvin's Abusive and Discriminatory Conduct***

25. On August 28, 2023, Defendant Colvin visited the Phoenix market for his first and only visit while serving as Mr. Causey's supervisor. During this visit, Defendant Colvin made his hostility toward Mr. Causey and Derik Fales immediately clear, informing both directors that he "did not want" them or their operation but had been given no choice in the matter.

26. During this same visit, Defendant Colvin engaged in conduct specifically targeting Mr. Causey's race and professionalism. In front of Mr. Causey's partner Derik Fales

and other colleagues, Defendant Colvin insulted Mr. Causey's apparel in a demeaning manner and questioned his leadership capabilities based on how he was dressed. This conduct was witnessed by Fales and others present.

27. Defendant Colvin's comments about Mr. Causey's appearance and professionalism reflected racial stereotypes and were not made regarding similarly situated White directors under his supervision. Defendant Colvin specifically stated that Mr. Causey's polo and business shoes were unprofessional looking.

28. From the outset of his supervision, Defendant Colvin demonstrated a pattern of discriminatory treatment toward Mr. Causey that differed markedly from his treatment of White directors in similar positions.

***Mr. Causey's Complaint to Company Leadership***

29. By May 2024, the situation with Defendant Colvin had deteriorated to the point that company leadership recognized the need for intervention. On May 28, 2024, when Derik Fales announced his intention to retire, Mr. Causey and Fales were asked to fly to Denver to meet with President Kelly.

30. The stated purpose of the Denver meeting was to convince Fales to remain with the company or, if he chose to retire, to confirm that Mr. Causey would stay and assume responsibility for the entire operation.

31. During a one-on-one meeting with President Kelly, Mr. Causey provided detailed and candid feedback regarding his experience under Defendant Colvin's leadership. Mr. Causey informed President Kelly that there was a complete lack of regard for diversity in the South Region and that Defendant Colvin demonstrated no interest in holding his leaders accountable regarding diversity, equity, and inclusion initiatives.

32. Mr. Causey specifically told President Kelly that he felt he was being personally targeted by Defendant Colvin due to his level of engagement with DEI initiatives within the company. He explained that Defendant Colvin's treatment of him was argumentative, unconstructive, and appeared motivated by racial animus.

33. Mr. Causey also provided President Kelly with specific examples of Defendant Colvin's inappropriate conduct toward Tyrone O'Neal, another Black director in the region. Mr. Causey reported that Defendant Colvin consistently and publicly mocked O'Neal's director interview, describing it as "the worst interview he has ever conducted" whenever the opportunity arose.

34. Mr. Causey informed President Kelly that Defendant Colvin was someone who could not accept feedback or disagreement, explaining that other leaders in the region had warned him to avoid disagreeing with Defendant Colvin because "it does not work out well."

35. When Mr. Causey raised these concerns, President Kelly responded by asking if Mr. Causey was "trying to get fired so that he could sue the company." Mr. Causey was appalled by this response but assured President Kelly that he remained committed to the company after seventeen years of service.

36. Despite the serious nature of Mr. Causey's complaints, President Kelly indicated that he would relay the feedback to Defendant Colvin. The meeting concluded with Mr. Causey agreeing to make another attempt to work with Defendant Colvin, though he expressed his belief that Defendant Colvin would not change and that the situation would likely result in Mr. Causey losing his job.

37. During the Denver meeting, President Kelly confirmed that the "operation" would not return to the West Region and that Mr. Causey would assume the role of Director of Market



Operations for the entire operation (Nevada, New Mexico, and Arizona), eliminating the previous dual director model. However, after Mr. Causey was terminated, Aerotek reinstituted the “operation” in the West Region and appointed a director over that “operation.”

***Mr. Causey’s Continued Excellent Performance***

38. On July 1, 2024, Mr. Causey officially took over as Director of Market Operations for the entire operation following Fales’s retirement.

39. Despite the abusive work environment created by Defendant Colvin, Mr. Causey continued to perform at an exceptional level. In August 2024, his operation achieved its Prior Year End High Goal, making it one of only three operations in the region to reach this benchmark.

40. Mr. Causey managed a team of approximately 45 individuals and was recognized as having one of the best employee retention rates among directors in the company.

***The Pretextual Investigation and Retaliation***

41. On September 6, 2024, approximately three months after Mr. Causey’s complaints to President Kelly, Defendant Colvin conducted a Microsoft Teams call with Mr. Causey and informed him that he was being removed from his role as Director of Market Operations.

42. Defendant Colvin claimed that his decision was based on interviews he had conducted with five senior members of Mr. Causey’s team, during which he allegedly determined that Mr. Causey had “lost his team.” However, Defendant Colvin refused to disclose who he had interviewed, what questions he had asked, or what specific responses led to his conclusion.

43. Defendant Colvin explicitly acknowledged that Mr. Causey's removal was not based on performance, character, or integrity issues. Despite managing a team of 45 individuals, Defendant Colvin claimed that interviews with only five people provided sufficient basis for his decision.

44. Prior to making his complaints to President Kelly, Mr. Causey had never been subjected to any disciplinary action, performance improvement plans, or negative performance reviews.

45. Despite Defendant Colvin's promise that he would not notify Mr. Causey's team of any changes until after Mr. Causey had an opportunity to speak with Human Resources, Defendant Colvin held a meeting with team members on the same day, informing them of the decision.

***Human Resources Investigation Confirms Lack of Legitimate Basis***

46. On September 8, 2024, Mr. Causey contacted President Kelly to confirm whether he had approved Mr. Causey's removal. President Kelly confirmed the decision but acknowledged that the Denver meeting had not constituted any form of verbal warning and that Mr. Causey was not being removed for performance, character, or integrity issues.

47. President Kelly admitted that Defendant Colvin had never visited Mr. Causey's office to assess his performance or engagement with his team, yet President Kelly stated that he "trusted Jeff Defendant Colvin's decision."

48. On September 9, 2024, Mr. Causey met with Suzanne Russo, Aerotek's Director of Human Resources. Ms. Russo confirmed that she had not participated in any of Defendant Colvin's interviews with the five employees and did not know who had been interviewed or what

questions had been asked. Similar to the statement received from President Kelly, Ms. Russo told Mr. Causey that he was not being removed for performance, character, or integrity issues.

49. Ms. Russo acknowledged that Mr. Causey had never been subject to any write-ups, verbal warnings, performance plans, or HR complaints during his entire tenure with the company. She further confirmed that there was no established criteria for determining when a director had “lost their team” and no structured process for such situations.

50. Mr. Causey informed Ms. Russo that he believed Jeff was targeting and treating him differently because of his status as a Black male and for making a complaint regarding race discrimination to President Kelly. Mr. Causey noted that other White directors, specifically Directors Rick Wheaton and James Wilcock, had serious HR complaints filed against them but received no discipline from Defendant Colvin.

51. Mr. Causey asked Ms. Russo to conduct her own interviews with the five individuals and others on his team, which she agreed to do and promised to provide him with notes from Defendant Colvin’s interviews. However, Ms. Russo never provided Mr. Causey with any information from these purported interviews.

52. On October 3, 2024, Ms. Russo informed Mr. Causey that Defendant Colvin had not actually asked five questions as initially claimed, but rather “more like three questions.” Despite multiple requests, neither Ms. Russo nor Defendant Colvin ever provided Mr. Causey with the criteria used to determine that he had “lost his team,” the identity of the individuals interviewed, or the specific questions asked and responses received.

*Differential treatment of Similarly Situated White Employees*

53. Mr. Causey's treatment stands in stark contrast to Defendant Colvin's handling of serious misconduct by White directors under his supervision. This differential treatment demonstrates the racial motivation behind Mr. Causey's removal.

54. Rick Wheaton, a White male Executive Director in the South Region reporting to Defendant Colvin, was reported to Human Resources for sending inappropriate sexual images to a female employee. The incident was reported to HR in or around the summer of 2024. Defendant Colvin knew about the incident, and President Kelly knew or should have known about the incident involving Wheaton. Despite this serious misconduct, Wheaton remained in his position without any disciplinary action or removal from his role.

55. James Whillock, a White male Director of Market Operations reporting to Defendant Colvin, was reported to Human Resources by his team for arriving at work intoxicated and behaving in a disorderly manner. Upon information and belief, the incident was reported to HR in or around the summer of 2024. Defendant Colvin knew about the incident, and President Kelly knew or should have known about the incident involving Whillock. Like Wheaton, Whillock remained in his director position without consequence.

56. Keith Moffitt, a White male Director of Market Operations under Defendant Colvin's supervision, reported to Defendant Colvin that his office was underperforming and that his team was not following his leadership. In a written report, Moffitt acknowledged feeling that he was not leading his team correctly. Defendant Colvin knew about the incident, and President Kelly knew or should have known about the incident involving Moffitt. Rather than removing Moffitt from his role or conducting interviews with his team members, Defendant Colvin simply

advised him to examine the culture he was creating and work on improvements. Moffitt retained his director position.

57. Robert McKimm, a White male Director of Sales for the Florida market under Defendant Colvin's supervision, lives in Georgia and does not report to an office daily, despite his assigned market being in Florida. Defendant Colvin has never questioned McKimm's remote work arrangement or suggested that he relocate closer to his assigned market.

58. In contrast to his treatment of these White directors, Defendant Colvin suggested that Mr. Causey should report to the East Phoenix office, which was one hour and thirty minutes from Mr. Causey's home, despite the fact that Mr. Causey was already reporting to the West Phoenix office three days per week and the East office twice per week.

59. The differential treatment of these similarly situated employees demonstrates that White directors under Defendant Colvin's supervision were afforded opportunities for coaching, improvement, and accommodation that were denied to Mr. Causey.

***Mr. Causey's Constructive Termination through Demotion Offers***

60. Following his removal from the director position, Ms. Russo attempted to find Mr. Causey alternative employment within Allegis Group. However, all positions offered represented significant demotions that would have substantially reduced his compensation, responsibilities, and career prospects. Each alternative position was significantly less prestigious and provided less room for advancement relative to Mr. Causey's former director position.

61. Mr. Causey reasonably declined these demotions, as accepting such positions would have required him to acknowledge that his removal was justified and would have resulted in substantial financial harm. Ms. Russo acknowledged that offering only demotions was problematic but stated that no director-level positions were available.

62. On October 16, 2024, Ms. Russo provided Mr. Causey with a standard severance package that required him to release all claims against the company, including his discrimination and retaliation claims.

63. When Mr. Causey declined to sign the severance agreement because it would waive his rights to pursue his legitimate discrimination claims, Aerotek informed him that his refusal to accept a demotion would be treated as a resignation effective November 1, 2024.

64. Mr. Causey never submitted a letter of resignation and never voluntarily left his employment. His departure constituted a constructive termination resulting from Aerotek's creation of intolerable working conditions and unreasonable demands that he accept a demotion for discriminatory and retaliatory reasons.

### **HARM CAUSED**

65. As a direct and proximate result of the Defendants' wrongful conduct, Mr. Causey has suffered and continues to suffer substantial harm.

66. At the time of his termination, Mr. Causey was earning a base salary of \$151,000, with total annual compensation of approximately \$380,000 including bonuses and other benefits. His removal resulted in the immediate loss of this substantial income.

67. Mr. Causey forfeited approximately 9,000 in unvested company shares valued at \$11.50 per share, totaling over \$100,000 in lost equity compensation. He also lost his annual dividend payout on 55,000 shares, which typically provided approximately \$0.75 per share.

68. Mr. Causey was denied his fourth quarter bonus, which typically ranged from \$20,000 to \$30,000, resulting in additional lost compensation of approximately \$100,000.

69. The discriminatory treatment has caused Mr. Causey severe emotional distress, anxiety, depression, and loss of sleep.

70. Mr. Causey's professional reputation has been damaged by his removal from the director position under circumstances that suggested performance problems, despite the acknowledgment that no such problems existed.

71. The financial stress caused by the loss of income has impacted Mr. Causey's ability to support his family and his parents, creating additional emotional distress and anxiety about his family's financial security.

72. Mr. Causey's seventeen-year career with Aerotek, during which he made substantial contributions to the company's success and helped establish critical diversity and inclusion initiatives, has been effectively destroyed by Defendants' discriminatory conduct.

### **COUNT I**

#### **Race Discrimination in Violation of Title VII of the Civil Rights Act of 1964**

73. Mr. Causey incorporates herein the allegations set forth in paragraphs 1 through 72, above.

74. Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.*, prohibits employers from discriminating against employees on the basis of race with respect to compensation, terms, conditions, or privileges of employment.

75. Mr. Causey is a member of a protected class under Title VII based on his race as an African American.

76. Mr. Causey was qualified for his position as Director of Market Operations and performed his job duties in a manner that met or exceeded Aerotek's legitimate business expectations. His exemplary performance was demonstrated through awards, recognition, and achievement of operational goals.

77. Despite his qualifications and performance, Mr. Causey was subjected to adverse employment actions including: (a) the removal from his director position; (b) being offered

significantly less prestigious job positions that would have constituted a demotion; (c) the termination of his employment; and (d) denial of equal opportunities for advancement and retention.

78. Defendants' treatment of Mr. Causey was motivated by his race as evident by the differential treatment afforded to similarly situated White employees who engaged in more serious misconduct yet retained their positions, the pretextual nature of the reasons given for his removal, and the pattern of discriminatory conduct by Defendant Colvin.

79. Similarly situated White directors under Defendant Colvin's supervision who engaged in serious misconduct, including sending inappropriate sexual images to employees and reporting to work intoxicated, were not subjected to the same adverse treatment and were allowed to retain their positions.

80. The reasons provided by Aerotek for Mr. Causey's removal—that he had “lost his team” based on undisclosed interviews with five employees—were pretextual and applied inconsistently. White directors who acknowledged similar or worse team performance issues were provided coaching and support rather than removal.

81. Mr. Causey's race was the determining factor in the decision by Aerotek and/or Defendant Colvin to: (a) remove him from his director position; (b) offer him only alternative positions that would have resulted in a significant demotion; and (c) terminate his employment.

82. As a direct and proximate result of Aerotek's race discrimination, Mr. Causey has suffered and continues to suffer substantial damages.

## **COUNT II**

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

83. Mr. Causey incorporates herein the allegations set forth in paragraphs 1 through 72, above.



84. Title VII 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 discrimination complaints based on race.

85. Mr. Causey engaged in protected activity under Title VII when he: (a) complained to President Kelly about Defendant Colvin's discriminatory treatment based on race and the lack of diversity initiatives in the South Region; and (b) informed Ms. Russo that Defendant Colvin was treating him substantially different than the White Directors under Defendant Colvin's supervision solely because of Mr. Causey's race and in response to the complaints he raised with President Kelly.

86. Aerotek's management and leadership were aware of Mr. Causey's protected activity, as President Kelly acknowledged receiving the complaints and indicated he would relay the feedback to Defendant Colvin.

87. Shortly after engaging in the protected activity referenced above, Mr. Causey was subjected to adverse employment actions, including removal from his director position and the termination of his employment.

88. The close temporal proximity between Mr. Causey's complaints and the removal from his director position and termination of employment, combined with the lack of any legitimate performance, character, or integrity issues, establishes a causal connection between his protected activities and the adverse employment actions he experienced.

89. The pretextual nature of the investigation and the differential treatment afforded to White directors who engaged in more serious misconduct further demonstrates that Mr. Causey's removal was in retaliation for his discrimination complaints.

90. Defendants' actions of removing Mr. Causey from his director position and terminating his employment would dissuade a reasonable employee in Mr. Causey's position from engaging in protected activity under Title VII.

91. As a direct and proximate result of Defendants' retaliation, Mr. Causey has suffered and continues to suffer substantial damages.

**COUNT III**  
**Race Discrimination in Violation of 42 U.S.C. § 1981**

92. Mr. Causey incorporates herein the allegations set forth in paragraphs 1 through 72, above.

93. Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, provides that all persons shall have the same right to make and enforce contracts as is enjoyed by White citizens, and prohibits discrimination on the basis of race in contractual relationships.

94. Mr. Causey is a member of a protected class under Section 1981 based on his race as an African American.

95. Mr. Causey's employment relationship with Aerotek constitutes a contractual relationship protected under Section 1981, including his right to be free from racial discrimination in the terms and conditions of his employment contract.

96. Defendants, acting individually and in concert, intentionally discriminated against Mr. Causey based on his race by subjecting him to differential treatment, including: (a) the removal from his director position; (b) offering him less prestigious positions that would have constituted a significant demotion; (c) terminating his employment; and (d) denying him equal opportunities for advancement and retention.

97. Defendant Colvin, while acting within the scope of his employment and under color of his authority as Regional Vice President, personally and directly participated in the

discriminatory conduct by: a) making racially motivated comments about Mr. Causey's appearance and professionalism; b) treating Mr. Causey differently and more harshly than similarly situated White directors; c) conducting a pretextual investigation designed to justify Mr. Causey's removal; d) removing Mr. Causey from his position based on discriminatory motives; and e) creating and maintaining an abusive work environment based on Mr. Causey's race.

98. Defendant Colvin's conduct was intentional, willful, malicious, and taken because of Mr. Causey's race. Defendant Colvin knew or should have known that his actions violated Mr. Causey's civil rights.

99. Aerotek was aware of Defendant Colvin's treatment towards Mr. Causey but chose not to exercise reasonable care to prevent and promptly correct the mistreatment. Aerotek is liable under Section 1981 for the race-based discriminatory actions taken against Mr. Causey by Defendant Colvin.

100. Defendants' discriminatory conduct interfered with Mr. Causey's ability to make and enjoy the benefits of his employment contract on the same terms as White employees.

101. The differential treatment afforded to White directors under Defendant Colvin's supervision who engaged in serious misconduct demonstrates that Mr. Causey's race was the determining factor in the adverse treatment he received.

102. But for Mr. Causey's race, Defendants would not have removed him from his director position, terminated his employment, or denied him equal opportunities for advancement and retention.

103. As a direct and proximate result of Defendants' discriminatory conduct, Mr. Causey has suffered and continues to suffer substantial damages.

**COUNT IV**  
**Unlawful Retaliation in Violation of 42 U.S.C. § 1981**

104. Mr. Causey incorporates herein the allegations set forth in paragraphs 1 through 72, above.

105. Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, prohibits employers from retaliating against employees who oppose race-based discriminatory practices or participate in proceedings related to race-based discrimination complaints.

106. Defendants' conduct violated 42 U.S.C. § 1981 for the same reasons set forth in paragraphs 85 through 90, above.

107. Defendant Colvin, while acting within the scope of his employment and under color of his authority as Regional Vice President, personally and directly participated in the retaliatory conduct by: a) removing Mr. Causey from his position after learning that Mr. Causey had complained to President Kelly about race-based discrimination on the part of Defendant Colvin; and b) causing Mr. Causey to be constructively discharged and ultimately terminated.

108. Defendant Colvin's conduct was intentional, willful, malicious, and taken in response to Mr. Causey's complaints of discrimination.

109. Aerotek was aware of Defendant Colvin's retaliatory conduct towards Mr. Causey but chose not to exercise reasonable care to prevent and promptly correct the mistreatment. Aerotek is liable under Section 1981 for the race-based discriminatory actions taken against Mr. Causey by Defendant Colvin.

110. But for Mr. Causey opposing Defendant Colvin's race-based discriminatory conduct, Defendant Colvin would not have removed him from his director position.

111. But for Mr. Causey opposing Defendant Colvin's race-based discriminatory conduct, Aerotek would not have terminated his employment.

112. As a direct and proximate cause of Defendants' retaliatory conduct, Mr. Causey has suffered and continues to suffer substantial harm.

**COUNT V**

**Unlawful Race Discrimination in Violation of Maryland Fair Employment Practices Act**

113. Mr. Causey incorporates herein the allegations set forth in paragraphs 1 through 72, above.

114. The Maryland Fair Employment Practices Act, Md. Code Ann., State Gov't § 20-601 *et seq.* ("MFEPA"), prohibits employers from discriminating against employees on the basis of race with respect to compensation, terms, conditions, or privileges of employment.

115. Defendants' conduct constituted unlawful discrimination in violation of MFEPA's for the same reasons set forth in paragraphs 75 through 81, above.

116. As a direct and proximate result of Defendants' wrongful conduct, Mr. Causey has suffered and continues to suffer substantial harm.

**COUNT VI**

**Unlawful Retaliation in Violation of Maryland Fair Employment Practices Act**

117. Mr. Causey incorporates herein the allegations set forth in paragraphs 1 through 72, above.

118. The MFEPA prohibits employers from retaliating against employees who engage in certain protected activities, which includes opposing race-based discriminatory practices or participate in proceedings related to discrimination complaints based on race.

119. Defendants' conduct constituted unlawful discrimination in violation of MFEPA's for the same reasons set forth in paragraphs 85 through 90, above.

120. As a direct and proximate result of Defendants' wrongful conduct, Mr. Causey has suffered and continues to suffer substantial damages.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Sullivan Causey Jr. respectfully requests that the Court enter judgment on the Complaint, in his favor and against Defendants Aerotek, Inc. and Jeff Colvin, as follows:

- A. Award Mr. Causey appropriate amounts of backpay and front pay, in fair and reasonable amounts to be determined at trial;
- B. Award Mr. Causey compensatory damages for the harm he suffered as a result of Defendants' unlawful conduct, in fair and reasonable amount to be determined at trial, but no less than \$3,000,000;
- C. Award Mr. Causey punitive damages against Defendants, in an amount that sufficiently punishes, penalizes, and deters their unlawful conduct;
- D. Award Mr. Causey pre-judgment interest and post-judgment interest;
- E. Award Mr. Causey the costs and fees he incurred in connection with this action, including reasonable attorneys' fees;
- F. Order Defendant Aerotek to implement comprehensive training for all managers and supervisors regarding race discrimination, retaliation, and equal employment opportunity obligations under federal law;
- G. Order Defendant Aerotek to review and revise its policies and procedures for investigating discrimination complaints and ensuring fair treatment of employees who engage in protected activity; and
- H. Grant Mr. Causey such other relief as the Court deems just and proper.

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Dated: July 22, 2025

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