

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND
14735 Main Street, Upper Marlboro, Maryland 20772

SOFIA FRANCO,
c/o Justly Prudent
16701 Melford Blvd., Suite 400
Bowie, Maryland 20715

Case No. C-16-CV-26-001360

DEMAND FOR JURY TRIAL

Plaintiff,

v.

PRINCE GEORGE'S COUNTY, MARYLAND,
Serve By Private Process On:
c/o Office of Law
1301 McCormick Drive, Suite 4100,
Largo, Maryland 20774

MICHELLE LYONS,
Serve By Private Process On:
c/o Office of Law
1301 McCormick Drive, Suite 4100,
Largo, Maryland 20774

Defendants.

COMPLAINT FOR RACE DISCRIMINATION

Plaintiff Sofia Franco, for her Complaint against Defendants Prince George's County, Maryland (the "County") and Michelle Lyons ("Defendant Lyons"), individually, alleges the following:

1. Sofia Franco wanted nothing more than to do her job well. She came to Prince George's County Government in January 2023 as a Paralegal Supervisor—a young, talented, Hispanic and Latina professional ready to build a career in public service. What she found instead was a workplace poisoned by bigotry, hostility, and institutional indifference.

2. From the earliest days of her employment, Ms. Franco's supervisor, Defendant Michelle Lyons, subjected her to a relentless campaign of race-based harassment and intimidation. Defendant Lyons called Ms. Franco "the new Spanish bitch on the 5th floor" who was "trying to get all the Black people fired." She made repeated references to immigration enforcement and ICE raids in Ms. Franco's presence, told her that her "cleaning lady got deported because she's Latina" and warned Ms. Franco to "be careful." She stripped Ms. Franco of core paralegal duties, revoked her access to workplace timekeeping systems while allowing her Black coworker to retain full access, and told Ms. Franco that she was "only good" for "showing up to work."

3. Ms. Franco attempted to seek help by reporting the discrimination through multiple avenues, including to HR, the Associate Director, the Deputy Director, and the County's Office of Human Resources Management. In response to each complaint, the County did nothing, discouraged further complaints, and allowed the retaliation to intensify. HR Supervisor Thelia Jones told Ms. Franco that filing an EEOC complaint would "go up to OHRM and then get lost." Associate Director Eric Ampedu promised investigations that never materialized and accused Ms. Franco of being "untruthful" when she documented the mistreatment. When Ms. Franco finally filed a formal EEO complaint with OHRM in December 2025, the County's own EEO investigator, Suzette Jelinek, made discriminatory remarks during the intake, joking about ICE coming for Ms. Franco and racially stereotyping Defendant Lyons based on having attended "an all-Black school."

4. The retaliation that followed Ms. Franco's EEO complaint was swift and unmistakable. Less than one month after filing, Ms. Franco received an involuntary transfer letter stripping her of all paralegal functions and reassigning her to review construction applications.

This work was entirely outside the scope of her training, expertise, and position. Defendant Lyons moved Ms. Franco's belongings without her consent and told employees in her new department that Ms. Franco was "lazy" and "need[ed] to be watched." The County then drafted a new position description that preserved Ms. Franco's title while gutting the substance of her role, a maneuver designed to obscure what was, in all material respects, a constructive demotion.

5. Ms. Franco brings this action to seek redress for the discrimination, retaliation, and hostile work environment she has endured, in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.*, Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, Section 1 of the Ku Klux Klan Act of 1871, codified as 42 U.S.C. § 1983, and Maryland law.

JURISDICTION AND VENUE

6. The Court has jurisdiction over this action under Md. Code Ann., Cts. & Jud. Proc. § 1-501.

7. Venue is proper in this Court under Md. Code Ann., Cts. & Jud. Proc. § 6-201(a) because Defendant Prince George's County, Maryland maintains its principal offices within Prince George's County, the causes of action at issue arose within Prince George's County, and Ms. Franco was employed by the County within Prince George's County at all times relevant to this Complaint.

THE PARTIES

8. Plaintiff Sofia Franco is a Hispanic/Latina woman born in 1993. At all times relevant to this Complaint, Ms. Franco was employed by Prince George's County Government as a Paralegal Supervisor, Grade G-18, within the Department of Permitting, Inspections and

Enforcement (“DPIE”). Ms. Franco was the only Hispanic/Latino employee in her section on the fifth floor of DPIE. Ms. Franco resides in Prince George’s County, Maryland.

9. Defendant Prince George’s County, Maryland is a municipal corporation duly organized and existing under the laws of the State of Maryland. The County’s Charter provides that Prince George’s County shall be the named party in all actions and proceedings touching its rights, powers, properties, liabilities, and duties. At all times relevant to this Complaint, the County employed Ms. Franco and was responsible for the policies, customs, practices, and final decisions giving rise to the constitutional violations alleged herein.

10. Defendant Michelle Lyons was, at all times relevant to this Complaint, employed by Prince George’s County Government as an Administrative Specialist I, Grade G-29, within DPIE. Defendant Lyons served as the direct supervisor of the Boards and Commission Division, where she exercised supervisory authority over Ms. Franco, including control over Ms. Franco’s day-to-day work assignments, system access, schedule, office location, communications with the Office of Law, and recommendations regarding personnel actions. Defendant Lyons is sued in her individual capacity, and upon information and belief, she resides in Prince George’s County, Maryland.

BACKGROUND

11. In or around January 2023, the County hired Ms. Franco as a Paralegal Supervisor, Grade G-18, within the Boards and Commission Division of DPIE. Ms. Franco’s duties included legal research, drafting legal documents, preparing opinions and orders, coordinating with the Office of Law, submitting judicial review filings through the Maryland Electronic Courts (“MDEC”) electronic filing system, recording proceedings, preparing Findings of Fact, and preparing Notices of Action.

12. Ms. Franco reported directly to Defendant Lyons, who served as the Administrative Specialist I, Grade G-29, and supervised the Boards and Commission Division. At all times relevant to this Complaint, Ms. Franco was the only Hispanic/Latino employee in her section on the fifth floor of DPIE.

13. Also within the Boards and Commission Division was Semaj Reams, a Black male who held an administrative position under Defendant Lyons's supervision. Mr. Reams was not trained or hired as a paralegal.

14. On or about January 23, 2024, a temporary employee named Kayla Garces was terminated from DPIE for reporting to work under the influence of marijuana. Ms. Garces had a close personal relationship with both Defendant Lyons and Mr. Reams. Shortly after Ms. Garces's termination, Defendant Lyons's demeanor toward Ms. Franco changed dramatically, and Defendant Lyons began directing racially hostile comments and conduct toward Ms. Franco.

15. During a telephone conversation on or about January 23, 2024, Defendant Lyons referred to Ms. Franco as "the new Spanish bitch on the 5th floor" who was "trying to get all the Black people fired." Defendant Lyons further stated, "it's okay because it gets lonely at the top." This comment was unprovoked, unrelated to any work matter, and directed squarely at Ms. Franco's race and national origin.

16. On or about January 25, 2024, Ms. Franco reported Defendant Lyons's "Spanish bitch" comment to Eric Ampedu, the Associate Director of DPIE's Administrative Services Division and the department's HR Director. Mr. Ampedu took no investigative or corrective action in response to Ms. Franco's report.

17. On or about January 30, 2024, within days of Ms. Franco's report to Mr. Ampedu, Defendant Lyons removed Ms. Franco from her private office and relocated her to a cubicle that

had been occupied by the recently terminated temporary employee. Defendant Lyons justified this action by claiming that only employees at Grade G-23 or higher were entitled to private offices pursuant to a departmental chart. Ms. Franco subsequently confirmed with HR Supervisor Thelia Jones that no such chart or policy existed and that office assignments were based on job position and the confidential nature of an employee's duties. The office removal was the first tangible negative action Ms. Franco experienced after reporting Defendant Lyons's discriminatory conduct.

18. On or about February 2, 2024, a meeting was convened with Deputy Director Lamont Hinton and Defendant Lyons to address Ms. Franco's concerns. Rather than addressing the discrimination Ms. Franco reported, Deputy Director Hinton made a demeaning remark, stating: "Pinch me—oh, the boogie man just pinched me. I heard you're the new boogie man; people are scared of you on this floor." Defendant Lyons further stated during this meeting that certain staff members "did not want to report" to Ms. Franco because she was "too young" and "inexperienced." Despite Ms. Franco raising concerns about discrimination and retaliation during this meeting, no corrective action was taken by any County official.

19. On or about February 5, 2024, Defendant Lyons made racially and politically charged comments, stating that "some ethnic communities" were upset with Angela Alsobrooks. Ms. Franco understood Defendant Lyons's comments to be referring to Latino individuals. These comments reinforced the pattern of race-based hostility directed at Ms. Franco.

20. On or about February 12, 2024, Defendant Lyons attempted to isolate Ms. Franco from colleagues in the Enforcement Division on the sixth floor, where Ms. Franco had previously worked and maintained professional relationships. Defendant Lyons directed Ms. Franco not to go to the sixth floor and spread rumors that certain employees in the Enforcement

Division “did not like Bill [Edelen] because he was White,” thereby creating racial division within the office and further marginalizing Ms. Franco.

Ms. Franco’s Initial Efforts to Seek Help: January–May 2025

21. In or around January 2025, Ms. Franco contacted Dr. Anthony Ferguson, a County official, to report that she was being racially discriminated against by Defendant Lyons. Ms. Franco told Dr. Ferguson that she had reported the discrimination to HR within DPIE but that nothing had been done. Ms. Franco expressed fear of further retaliation if she continued to report Defendant Lyons’s conduct. Dr. Ferguson directed Ms. Franco to contact Suzette Jelinek at the Office of Human Resources Management (“OHRM”) and assured Ms. Franco that if Ms. Jelinek did not respond, he would intervene on her behalf.

22. On or about May 1, 2025, Ms. Franco emailed Ms. Jelinek at OHRM, stating that she had been informed Ms. Jelinek was “the most appropriate person to address the ongoing challenges” she had been facing at work. Ms. Jelinek did not respond to this communication.

23. On or about May 1, 2025, shortly after sending the email to Ms. Jelinek, Defendant Lyons caused Ms. Franco’s access to the mobile clock-in and clock-out feature in the County’s timekeeping system to be revoked without prior notice or justification. Ms. Franco contacted Tiffany McNeal in HR, who confirmed that Defendant Lyons had submitted a request to change Ms. Franco’s system access. Ms. Franco was told that employees with telework schedules did not have access to this feature from their personal devices. Ms. Franco later discovered that this explanation was false because her coworker, Mr. Reams, who also had a telework schedule, maintained full access to the mobile clock-in and clock-out feature from his personal device, as did other DPIE employees. Ms. Franco was the only employee singled out for this restriction.

24. Defendant Lyons knew about Ms. Franco's complaint to OHRM prior to revoking her access to the mobile clock-in and clock-out timekeeping feature. On or about February 10, 2025, Defendant Lyons told an employee within DPIE that Ms. Franco was "complaining about her to OHRM."

25. On or about May 22, 2025, during a three-way telephone call with Defendant Lyons and Bill Edelen, Defendant Lyons yelled aggressively at Ms. Franco and demanded that she post Nuisance Abatement Board hearing notices using her personal vehicle. This was a duty not included in Ms. Franco's position description. When Ms. Franco declined, Defendant Lyons became hostile. Later that same day, Defendant Lyons made a comment about her "cleaning lady," stating that she believed the cleaning lady "got deported because she's Latina," and then told Ms. Franco directly to "be careful." This comment was directed at Ms. Franco specifically because of her Latino ethnicity and national origin, and Ms. Franco reasonably understood it as a threat related to her ethnic background.

26. On or about July 16, 2025, during a meeting conducted via Microsoft Teams with Defendant Lyons and Mr. Reams, Defendant Lyons called Ms. Franco "too young," a "mean girl," and stated that Ms. Franco "lacked initiative." Defendant Lyons further stated that she had spoken with her supervisor, Lori Parris, who referred to Ms. Franco and her coworker as "glorified clerks." Defendant Lyons asked Ms. Franco if she was "still interested" in her job and stated that she could "remove [Ms. Franco] and put [her] in other places." Defendant Lyons also stated that performance evaluations were approaching and that these issues would be reflected in Ms. Franco's evaluation, despite having never previously raised any formal performance concerns with Ms. Franco at any point during her employment.

27. Throughout 2024 and 2025, Defendant Lyons systematically stripped Ms. Franco of paralegal duties and reassigned responsibilities to Mr. Reams, who held an administrative position and was neither trained nor hired as a paralegal. Defendant Lyons withheld information from Ms. Franco necessary to perform her job, refused to provide Ms. Franco with a signed copy of her Form 544 (position description and job duties), excluded Ms. Franco from meetings, and restricted Ms. Franco's ability to communicate directly with the Office of Law. These actions occurred all while Defendant Lyons allowed Mr. Reams, a Black male, to assume duties beyond his job classification without restriction.

The ICE Threats and Intimidation Intensify: September 2025

28. In or around September 2025, Defendant Lyons approached Ms. Franco and stated, "guess who works for me," claiming that the Director of Homeland Security was working for her through her nonprofit organization, the 100 Black Women of Charles County. Defendant Lyons stated that she "could get whatever she want[ed]." Ms. Franco understood this statement as an implied threat given the established pattern of ICE-related and immigration-related comments Defendant Lyons had directed towards her.

29. On or about September 18, 2025, Defendant Lyons created and spread a false rumor that an inspector in the Enforcement Division was under investigation for taking bribes. Defendant Lyons also stated that she had told certain employees of Latino descent "to be careful" because they had "previously been under investigation" and were "being watched." Ms. Franco overheard Defendant Lyons making these comments. Defendant Lyons's conduct furthered the hostile and intimidating atmosphere directed at employees of Hispanic/Latino national origin, including Ms. Franco.

HR's Continued Failure to Act and Active Discouragement: August–October 2025

30. Throughout 2024 and 2025, Ms. Franco reported Defendant Lyons's discriminatory and retaliatory conduct to HR Supervisor Thelia Jones on approximately five separate occasions. Ms. Jones was dismissive and nonchalant in response to each report. On or about August or September 2025, during a meeting in Ms. Jones's office at DPIE, Ms. Jones told Ms. Franco that if she filed an EEOC complaint, it would "go up to OHRM and then get lost." Rather than assisting Ms. Franco or initiating an investigation, Ms. Jones actively discouraged Ms. Franco from exercising her right to file a formal complaint of discrimination.

31. Throughout 2024 and 2025, Ms. Franco also reported Defendant Lyons's conduct to Eric Ampedu, the Associate Director and department-level HR Director, on approximately four separate occasions. Each time, Mr. Ampedu stated that he would consult with Deputy Director Lamont Hinton about the situation and would get back to Ms. Franco. Mr. Ampedu never followed up on any of these occasions and no investigation was ever conducted.

32. On or about September 4, 2024, and continuing into 2025, Defendant Lyons attempted to alter Ms. Franco's telework schedule to require Ms. Franco to cover Thursday and Friday in-office duties, rather than addressing attendance concerns with Mr. Reams, who was reportedly not reporting to the office on his scheduled in-office days of Thursday and Friday. When Ms. Franco emailed Defendant Lyons and HR to complain that she was being treated inequitably, no corrective action was taken regarding Mr. Reams.

33. In or around October 2025, Defendant Lyons sent an email directing that all Nuisance Abatement Board hearings be conducted in the office rather than remotely. Both Mr. Reams and Ms. Franco were required to comply. However, when hearings were held in the office, Ms. Franco was the only employee who consistently appeared in compliance with this

directive. Mr. Reams failed to appear in the office for hearings, and to Ms. Franco's knowledge, Defendant Lyons took no action against him for his noncompliance. The directive was enforced exclusively against Ms. Franco, a Hispanic/Latina employee, while Mr. Reams, a Black employee, was permitted to disregard it without consequence.

The October 2025 Confrontations and HR's Complicity

34. On or about October 2, 2025, Ms. Franco requested that Bill Edelen correct a procedural error on a form submitted to the Nuisance Abatement Board, as directed by Calisa M. Smith at the Office of Law. Defendant Lyons became hostile during a telephone call, directing Ms. Franco to submit the incorrect form to the Board for a vote and amend it later. When Ms. Franco requested written directives, Defendant Lyons cursed, stating, "I am the boss, and I'm not doing that shit. I will speak to you later, Sofia," and hung up on Ms. Franco.

35. Ms. Franco reported the October 2, 2025 incident to Ms. Jones on the same day. Ms. Jones told Ms. Franco that she was "in the wrong" because she had listened to Ms. Smith at the Office of Law instead of Defendant Lyons. Ms. Jones further stated that Defendant Lyons was "politically connected" and reiterated her warning that an EEOC complaint would "go up to OHRM and then get lost."

36. On or about October 14, 2025, Ms. Franco took a personal day due to severe stress caused by the hostile work environment. The following day, Ms. Franco received correspondence from HR indicating that Defendant Lyons had reported concerns about the number of sick days Ms. Franco was taking and had requested that Ms. Franco be placed on FMLA leave, despite Ms. Franco having no disciplinary record, no documented performance issues, and having made no request for FMLA leave. This action was designed to create a paper

trail suggesting that Ms. Franco had attendance or medical issues warranting administrative intervention.

37. On or about September 30, 2025, Toya Burnett entered Ms. Franco's cubicle without her consent, touched her keyboard, looked at her phone screen, and asked her personal questions. Ms. Franco reported this incident to Ms. Jones, who advised Ms. Franco not to send an email documenting the incident because it would "just be she said, she said." On or about October 20, 2025, Ms. Burnett confronted Ms. Franco in a frustrated manner about the complaint, stating, "Did you go to HR to complain about me? You could have come to me instead of telling Lyons or HR." This confrontation occurred as a direct result of Ms. Franco's report to HR.

38. In or around November 2025, Defendant Lyons instructed Ms. Franco that she was no longer permitted to contact Ms. Smith, the attorney at the Office of Law, for legal guidance related to her paralegal duties. Defendant Lyons stated that she would be the sole point of contact with the Office of Law. This directive effectively stripped Ms. Franco of a core function of her Paralegal Supervisor position and further isolated her from the legal resources necessary to perform her job. No similar restriction was imposed on Mr. Reams or any other employee within the Boards and Commission Division.

The November 24, 2025 Formal Written Complaint

39. On or about November 20, 2025, during a Nuisance Abatement Board hearing, Ms. Franco discovered that Mr. Reams was clocking in and out from his personal phone and could view his timecard remotely. Mr. Reams showed Ms. Franco this functionality directly. This confirmed that the explanation Ms. Franco had been given by Defendant Lyons (i.e., that

telework employees did not have access to this feature) was false, and that Ms. Franco had been singled out for the restriction.

40. In or around November 2025, Ms. Franco's access to view her own timecard in the new Kronos/UKG timekeeping system was blocked. Ms. Franco repeatedly contacted Tiffany McNeal in HR about the error message she was receiving, but the issue was not resolved. Other DPIE employees, including Mr. Reams, had full access to view their timecards. Additionally, Ms. Burnett, who was not Ms. Franco's supervisor, was granted access to review Ms. Franco's timecard. Ms. Franco was also denied lunch-period timecard adjustments for hearings during which she worked through her lunch break. Defendant Lyons responded to other emails Ms. Franco sent but ignored Ms. Franco's timecard adjustment requests.

41. On November 24, 2025, Ms. Franco sent a detailed written complaint to Mr. Ampedu requesting an internal investigation into workplace concerns including retaliation, discrimination based on race, ethnicity, and age, inequitable treatment regarding time and attendance systems, denial of timecard access, and the hostile work environment. In this email, Ms. Franco specifically stated that she had "never been reprimanded, written up, or given any reason for this treatment." Ms. Franco further stated that the "continued behavior from my supervisor is retaliatory, creates a hostile work environment, and is causing unnecessary stress."

42. Mr. Ampedu met with Ms. Franco shortly after receiving the November 24, 2025 email. During this meeting, Mr. Ampedu initially accused Ms. Franco of being "untruthful" and stated that the information in her complaint was not accurate. When Ms. Franco informed Mr. Ampedu that she had emails and screenshots documenting the issues she had raised, Mr. Ampedu's demeanor changed. He stated that he would conduct an investigation and have a

meeting with Lori Parris, the Quality Assurance/Quality Control Manager for DPIE. Mr. Ampedu never followed up, and no investigation was conducted.

43. On or about December 5, 2025, Defendant Lyons called Ms. Franco at home and subjected her to an approximately two-hour telephone conversation during which Defendant Lyons made a series of statements that constitute direct evidence of discriminatory animus and retaliatory intent. During this call, Defendant Lyons stated, among other things, that: (a) Ms. Franco was “not fulfilling [her] job duties” and was “no longer protected by union laws” because she was at a G-scale level, which Ms. Franco understood as a direct threat to her job security; (b) Ms. Franco should “think about what [she] want[s] to do” and whether she “would like to find another position somewhere else,” giving Ms. Franco until the weekend to decide; (c) “When [Ms. Franco] rat[s] out people, [she] ha[s] to be careful because [she does] not know what position [she is] in”; (d) Mr. Reams “tells [Defendant Lyons] everything that [Ms. Franco] say[s] and everything that [she] do[es],” confirming that Mr. Reams was being used to surveil Ms. Franco and report her activities to Defendant Lyons; (e) Defendant Lyons had directed Toya Burnett to remove Ms. Franco from the snow duty volunteer overtime list because Defendant Lyons felt Ms. Franco was not doing her job, thereby denying Ms. Franco overtime opportunities available to other employees; (f) Defendant Lyons “might not need a paralegal there and might only need an admin,” threatening to eliminate Ms. Franco’s position; (g) Defendant Lyons had spoken to her supervisor, Lori Parris, who suggested placing Ms. Franco on a Performance Improvement Plan (“PIP”), despite no formal discipline, counseling, or negative performance evaluation ever having been issued to Ms. Franco; (h) Ms. Franco was “only good” for “show[ing] up to work” and was otherwise incapable of performing her duties; (i) “Every time [Defendant Lyons] talks to [Ms. Franco], she feels like she needs to watch what she says because

she feels like she is discriminating against [Ms. Franco] and that [Ms. Franco] will run to HR”; and (j) “Some of the things she said to [Ms. Franco] she would not have said in the office, and that she felt more comfortable saying them at home.”

44. Defendant Lyons’s acknowledgment that she was aware Ms. Franco had been “accusing her of discrimination” and her statement that she felt the need to “watch what she says” because Ms. Franco would “run to HR” constitute direct evidence that Defendant Lyons was aware of Ms. Franco’s protected activity and that her adverse actions were motivated, at least in part, by Ms. Franco’s complaints of discrimination.

45. At no point during Ms. Franco’s employment had she received any formal discipline, written reprimand, counseling, negative performance evaluation, or Performance Improvement Plan.

46. Following the December 5, 2025 telephone call, Ms. Franco sent a follow-up email to Defendant Lyons challenging her retaliatory conduct and documenting that Defendant Lyons was prohibiting her from performing certain duties and restricting privileges that had been previously approved by the Director. Defendant Lyons responded via email late that evening, accusing Ms. Franco of being “insubordinate” and not following her directives. Defendant Lyons subsequently recalled this email, but Ms. Franco had already viewed a preview of its contents on her County-issued phone.

47. After the December 5, 2025 call, Ms. Franco contacted Mr. Ampedu and informed him that she could not continue to endure the retaliation and hostile treatment she was receiving from Defendant Lyons. Ms. Franco asked Mr. Ampedu for information about how to request a transfer back to the Enforcement section so she would no longer have to report to Defendant

Lyons. Mr. Ampedu told Ms. Franco that “we could further discuss next week.” The discussion never occurred.

The December 12, 2025 EEO Complaint and the Tainted Investigation

48. After waiting approximately two weeks for Mr. Ampedu to follow through on his promise to conduct an investigation, Ms. Franco contacted Ms. Jelinek at OHRM. On or about December 12, 2025, Ms. Franco met with Ms. Jelinek in her office and filed a formal EEO complaint.

49. As a precondition to filing the EEO complaint, Ms. Jelinek required Ms. Franco to sign a confidentiality agreement. The agreement prohibited Ms. Franco from disclosing any information related to the investigation to anyone other than OHRM representatives, under threat of “disciplinary action up to and including termination” and potential “civil and criminal liability.” The requirement that Ms. Franco sign this confidentiality agreement as a condition of pursuing her discrimination complaint had a chilling effect on Ms. Franco’s ability to exercise her rights under federal and state anti-discrimination laws, including her ability to consult freely with counsel, discuss her experiences with potential witnesses, and seek support from colleagues.

50. Ms. Jelinek was the County official charged with impartially investigating Ms. Franco’s EEO complaint. During the December 2025 intake meeting, Ms. Jelinek made discriminatory comments. Specifically, when Ms. Franco described the ICE-related and immigration-related comments Defendant Lyons had directed at her, Ms. Jelinek responded by stating words to the effect that “being Latino is you being on top of everyone” and “now ICE is going to come.” Ms. Jelinek also made racially stereotyping comments about Defendant Lyons, stating that Defendant Lyons attended “an all-Black school” and that “all she knows is division” because “that is all she grew up knowing.” These comments by the County’s own EEO

investigator demonstrated that the County's internal complaint process was itself tainted by discriminatory bias, rendering the investigation neither impartial nor effective.

51. Ms. Jelinek stated she would interview witnesses, including Defendant Lyons and Mr. Reams, within days of the complaint. On the day Mr. Reams was scheduled to be interviewed, Defendant Lyons appeared at the office in his place and stated that Mr. Reams was "not feeling well." Ms. Franco believes, based on the pattern of Defendant Lyons's conduct throughout this matter, that Defendant Lyons interfered with the investigation by ensuring Mr. Reams did not appear for his scheduled witness interview.

The Involuntary Transfer: January 2026

52. On or about January 8, 2026, less than one month after Ms. Franco filed her EEO complaint with OHRM, Ms. Franco received a transfer letter stating that she was being involuntarily transferred from the Boards and Commission Division to the Quality Assurance and Quality Control ("QAQC") Unit, effective January 12, 2026. The transfer letter cited the non-competitive filling of a "vacant position" as the justification for the transfer.

53. The temporal proximity between Ms. Franco's December 12, 2025 EEO complaint and the January 8, 2026 transfer creates a strong inference that the transfer was retaliatory.

54. On or about January 9, 2026, prior to Ms. Franco's transfer taking effect, Defendant Lyons moved Ms. Franco's personal belongings to her new cubicle without Ms. Franco's knowledge or consent. During this process, Defendant Lyons told an employee in Ms. Franco's new department that Ms. Franco "need[ed] to be watched" because she "[did] not do [her] work" and was "lazy." This conduct constituted both an act of retaliation and a deliberate effort to poison Ms. Franco's new work environment.

The Constructive Demotion

55. The involuntary transfer constituted a constructive demotion. In her prior position as Paralegal Supervisor in the Boards and Commission Division, Ms. Franco's duties included legal research, drafting legal documents, preparing opinions and orders, coordinating with the Office of Law, submitting judicial review filings through the MDEC electronic filing system, recording proceedings, preparing Findings of Fact, and preparing Notices of Action. Following the transfer to QAQC, Ms. Franco's duties were reduced to reviewing third-party construction applications and performing purely administrative functions with no paralegal or legal research components.

56. Although Ms. Franco's title remained "Paralegal Supervisor" and her grade remained G-18, the substantive nature of her work was fundamentally altered to exclude the core paralegal functions for which she was hired. The County drafted a new Form 544 (Position Description) for Ms. Franco's QAQC position that attempted to recharacterize administrative duties as paralegal work, but the new position did not involve the legal research, legal drafting, court filings, or coordination with the Office of Law that defined Ms. Franco's prior role.

57. On or about February 18, 2026, Ms. Franco met with her new supervisor, Ugo Bosa, to discuss the new Form 544. During this meeting, Mr. Bosa acknowledged that the job classification title did not match Ms. Franco's actual duties. Mr. Bosa stated that when he inquired with HR before drafting the new Form 544, HR directed him to change only the duties and not the classification title. Mr. Bosa confirmed that he was "just doing as he was told." This directive from HR confirms that the County was aware the transfer had stripped Ms. Franco of

her paralegal functions but intentionally preserved the classification title to obscure the constructive demotion.

Continued Disparate Treatment Post-Transfer

58. Since the transfer to the QAQC Unit, Ms. Franco has continued to be subjected to disparate treatment regarding time and attendance. Ms. Franco remains the only employee in the Director's Office of DPIE who is required to clock in and out from the physical kiosk on the first floor, while all her coworkers retain the ability to clock in and out from their phones.

59. On or about February 3, 2026, a staff meeting was held at which it was announced that employees who arrive late cannot make up the time, must punch out at the scheduled time, and that comp time is considered overtime requiring the Director's approval. Ms. Franco subsequently learned that this meeting was directed at her. Any time Ms. Franco needs to leave early or arrive late, she must use leave, while her coworkers are not subjected to this same requirement.

60. Throughout her employment, the County has never issued any formal discipline, written reprimand, negative performance evaluation, or Performance Improvement Plan to Ms. Franco. Defendants' shifting and pretextual justifications, including allegations that Ms. Franco was not fulfilling her duties, was "insubordinate," missed deadlines, and that the transfer was to fill a "vacant position," are belied by the complete absence of any documented performance concerns in Ms. Franco's employment record.

HARM CAUSED

61. As a direct and proximate result of Defendants' discriminatory, retaliatory, and hostile conduct, Ms. Franco has suffered and continues to suffer significant harm across multiple dimensions of her professional and personal life.

62. Ms. Franco has suffered a constructive demotion. Although her title and pay grade have remained nominally unchanged, the substantive nature of her work has been fundamentally degraded. Ms. Franco was hired as a Paralegal Supervisor to perform legal research, draft legal documents, coordinate with the Office of Law, submit court filings through MDEC, and prepare Findings of Fact. These functions drew upon her professional training and advanced her career in the legal field. She now reviews third-party construction applications and performs purely administrative tasks that bear no relation to paralegal work. The County's deliberate decision to preserve her classification title while gutting her actual responsibilities has deprived Ms. Franco of the professional development, skill utilization, and career trajectory she would have otherwise enjoyed.

63. Ms. Franco has been denied workplace privileges and system access that were afforded to similarly situated non-Hispanic employees. She remains the only DPIE employee in the Director's Office who is required to clock in and out at a physical kiosk on the first floor, while all of her coworkers retain the ability to use their personal devices. She was denied access to view her own timecard in the Kronos/UKG system while other employees maintained full access. She was removed from the snow duty volunteer overtime list, depriving her of overtime compensation opportunities that remained available to her colleagues. These restrictions were imposed without any documented performance deficiency, disciplinary action, or legitimate business justification.

64. Ms. Franco has suffered severe emotional distress as a direct result of the hostile work environment, discrimination, and retaliation she has endured at DPIE. Ms. Franco has been in therapy for approximately two years to address the anxiety, stress, and emotional harm caused by Defendants' conduct. The ongoing nature of the mistreatment has caused Ms. Franco to break

down and cry at work on multiple occasions, has negatively impacted her personal well-being, and has affected her family life.

65. Ms. Franco has been subjected to a chilling effect on her ability to exercise her rights under federal and state anti-discrimination laws. The County conditioned her ability to file an EEO complaint on signing a confidentiality agreement that threatened termination and civil and criminal liability for any disclosure of information related to the investigation. HR Supervisor Thelia Jones told Ms. Franco that filing an EEOC complaint would “go up to OHRM and then get lost.” Associate Director Ampedu accused Ms. Franco of being “untruthful” when she documented the discrimination in writing. Defendant Lyons told Ms. Franco that she was “no longer protected by union laws,” that she should “be careful” when she “rat[s] out people,” and that “a case file was being created against [her].” The cumulative effect of these actions was to intimidate Ms. Franco, discourage her from reporting unlawful conduct, and isolate her from the institutional mechanisms designed to protect employees from discrimination.

66. Ms. Franco has suffered reputational harm within DPIE. Defendant Lyons told employees in Ms. Franco’s new department that Ms. Franco was “lazy” and “need[ed] to be watched,” thereby poisoning her new work environment before she even arrived. Defendant Lyons’s statements about Ms. Franco’s alleged performance deficiencies (none of which were ever documented through formal channels) have damaged Ms. Franco’s professional standing within the County government.

67. Ms. Franco has suffered dignitary harm. She was called “the new Spanish bitch” by her supervisor. She was told that her “cleaning lady got deported because she’s Latina” and warned to “be careful.” She was told she was “only good” for “showing up to work.” She was told that employees of Latino descent should “be careful” because they were “being watched.”

She endured the indignity of having the County's own EEO investigator make discriminatory jokes about ICE enforcement and racial stereotypes during the very meeting in which Ms. Franco sought protection from discrimination. These experiences have caused Ms. Franco profound humiliation and a justified sense of betrayal by the institution she sought to serve.

68. Ms. Franco's damages are ongoing. She continues to work in a position that does not utilize her paralegal training or skills. She continues to be subjected to disparate timekeeping and attendance requirements not imposed on her coworkers. She continues to suffer the emotional and psychological consequences of more than two years of sustained discrimination, retaliation, and institutional indifference.

COUNT I

Race-Based Hostile Work Environment in Violation of 42 U.S.C. § 1981 (Against Defendant Michelle Lyons)

69. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

70. Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, guarantees all persons the same right to make and enforce contracts, including employment contracts, as is enjoyed by white citizens, and prohibits racial discrimination in the making, performance, modification, and termination of contracts, including the conditions and privileges of the contractual relationship.

71. Ms. Franco is a member of a protected class under Section 1981 based on her status as a Hispanic/Latina woman.

72. Throughout Ms. Franco's employment at DPIE, Defendant Lyons subjected Ms. Franco to a pattern of severe and pervasive harassment based on Ms. Franco's race/ethnicity that was sufficiently severe or pervasive to alter the conditions of Ms. Franco's employment and create an abusive and hostile working environment.

73. The racially hostile conduct directed at Ms. Franco included, but was not limited to, the following: (a) Defendant Lyons referred to Ms. Franco as “the new Spanish bitch on the 5th floor” who was “trying to get all the Black people fired”; (b) Defendant Lyons made repeated references to ICE raids and immigration enforcement in Ms. Franco’s presence and directed comments about immigration authorities targeting Latino individuals specifically at Ms. Franco; (c) Defendant Lyons told Ms. Franco that her “cleaning lady got deported because she’s Latina” and warned Ms. Franco to “be careful”; (d) Defendant Lyons told employees of Latino descent to “be careful” because they were “being watched”; (e) Defendant Lyons stated that she had connections to the Director of Homeland Security and “could get whatever she wants”; (f) Defendant Lyons made racially and politically charged comments about Latino communities; (g) Defendant Lyons spread racial rumors to isolate Ms. Franco from colleagues; (h) Defendant Lyons called Ms. Franco “too young,” a “mean girl,” and stated she “lacked initiative”; (i) Defendant Lyons told Ms. Franco she was “only good” for “showing up to work”; and (j) Defendant Lyons told employees in Ms. Franco’s new department that Ms. Franco was “lazy” and “need[ed] to be watched.”

74. The hostile conduct was based on Ms. Franco’s race/ethnicity. Defendant Lyons’s comments explicitly referenced Ms. Franco’s Hispanic/Latino identity, made direct and implied threats related to immigration enforcement targeting Latino individuals, and reflected a pattern of animus directed at Ms. Franco because of her ethnic background. The harassment was not directed at similarly situated non-Hispanic employees.

75. The hostile conduct was unwelcome. Ms. Franco repeatedly reported the harassment to multiple levels of DPIE management and to OHRM, demonstrating that the conduct was neither invited nor tolerated.

76. The hostile conduct was sufficiently severe or pervasive to create an abusive working environment. The harassment spanned more than two years, involved direct racial epithets, repeated immigration-related threats, systematic isolation, stripping of job duties, and the creation of an atmosphere of fear and intimidation. The conduct was both objectively hostile, as a reasonable person in Ms. Franco's position would find the environment abusive, and subjectively hostile, as evidenced by Ms. Franco's emotional distress, her need for ongoing therapy, and her repeated reports seeking intervention.

77. Defendant Lyons personally participated in each of the acts of harassment described herein. She was not a bystander or a passive supervisor, she was the direct and sole perpetrator of the racially hostile conduct directed at Ms. Franco.

78. As a direct and proximate result of Defendant Lyons's conduct, Ms. Franco has suffered and continues to suffer severe substantial harm.

COUNT II
Retaliation in Violation of 42 U.S.C. § 1981
(Against Defendant Michelle Lyons)

79. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

80. Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, prohibits retaliation against an individual for opposing or complaining about racial discrimination in the contractual employment relationship.

81. Throughout her employment, Ms. Franco engaged in protected activity by opposing and reporting Defendant Lyons's racially discriminatory conduct. Ms. Franco's protected activities included, but were not limited to: (a) reporting the "Spanish bitch" comment to Mr. Ampedu on or about January 25, 2024; (b) raising concerns about discriminatory

treatment during the February 2, 2024 meeting with Deputy Director Hinton and Defendant Lyons; (c) reporting ongoing harassment to HR Supervisor Thelia Jones on approximately five occasions between 2024 and 2025; (d) reporting ongoing harassment to Mr. Ampedu on approximately four occasions between 2024 and 2025; (e) contacting Dr. Anthony Ferguson in or around January 2025 regarding racial discrimination; (f) emailing Ms. Jelinek at OHRM on or about May 1, 2025; (g) following up with Ms. Jelinek in or about October 2025; (h) sending a formal written complaint to Mr. Ampedu on November 24, 2025; (i) filing an EEO complaint with OHRM on or about December 12, 2025; and (j) sending a follow-up email to Defendant Lyons challenging her retaliatory actions in or about December 2025.

82. Defendant Lyons was aware of Ms. Franco's protected activities. Defendant Lyons was the subject of Ms. Franco's complaints and was directly informed of the allegations against her. On or about February 10, 2025, Defendant Lyons told a DPIE employee that Ms. Franco was "complaining about her to OHRM." During the December 5, 2025 telephone call, Defendant Lyons expressly acknowledged that she was aware Ms. Franco had been "accusing her of discrimination" and stated that "every time she talks to [Ms. Franco], she feels like she needs to watch what she says because she feels like she is discriminating against [Ms. Franco] and that [Ms. Franco] will run to HR."

83. Following Ms. Franco's protected activity, Defendant Lyons subjected Ms. Franco to a series of materially adverse actions, including, but not limited to: (a) removing Ms. Franco from her private office and relocating her to a cubicle within days of Ms. Franco's January 25, 2024 report to Mr. Ampedu; (b) revoking Ms. Franco's mobile clock-in and clock-out access on or about May 1, 2025 (i.e., the same day Ms. Franco emailed Ms. Jelinek at OHRM) while allowing Mr. Reams to retain full mobile access; (c) systematically stripping Ms. Franco of

paralegal duties and reassigning them to Mr. Reams, a non-paralegal employee; (d) barring Ms. Franco from contacting the Office of Law attorney, effectively eliminating a core function of her Paralegal Supervisor position; (e) attempting to alter Ms. Franco's telework schedule while declining to enforce attendance requirements against Mr. Reams; (f) directing that Ms. Franco be placed on FMLA leave without Ms. Franco's request and without any documented attendance or performance issues; (g) threatening during the December 5, 2025 telephone call that Ms. Franco was "no longer protected by union laws," that she should consider "finding another position," that "a case file was being created against [her]," and that Defendant Lyons "might not need a paralegal" and "might only need an admin"; (h) directing that Ms. Franco be removed from the snow duty volunteer overtime list, denying her overtime compensation opportunities available to other employees; (i) threatening to place Ms. Franco on a Performance Improvement Plan despite the complete absence of any documented performance deficiency; (j) initiating or recommending Ms. Franco's involuntary transfer to the QAQC Unit, which was effectuated on January 12, 2026, just 27 days after Ms. Franco's December 12, 2025 EEO complaint; (k) moving Ms. Franco's belongings without her consent on January 9, 2026 and telling employees in her new department that she was "lazy" and "need[ed] to be watched"; and (l) interfering with the OHRM investigation by preventing Mr. Reams from appearing for his scheduled witness interview.

84. There is a causal connection between Ms. Franco's protected activity and the adverse actions she suffered. The adverse actions followed Ms. Franco's protected activity in close temporal proximity, and in several instances occurred within days of a specific report or complaint. Defendant Lyons's own statements during the December 5, 2025 telephone call constitute direct evidence of retaliatory motive. The pattern of escalating adverse actions, each

following a report or complaint by Ms. Franco, further establishes the causal nexus between the protected activity and the retaliation.

85. As a direct and proximate result of Defendant Lyons's retaliatory conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT III
Retaliatory Hostile Work Environment in Violation of 42 U.S.C. § 1981
(Against Defendant Michelle Lyons)

86. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

87. Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, prohibits an individual from subjecting another to a retaliatory hostile work environment for engaging in protected activities under Section 1981, which include opposing race-based discriminatory practices, making a complaint of race-based discrimination whether through formal or informal channels, or participating in proceedings related to complaints of discrimination based on race.

88. Throughout her employment at DPIE, Ms. Franco engaged in protected activity under Section 1981 by opposing and reporting Defendant Lyons's racially discriminatory conduct, as described in detail in paragraph 81, above. Defendant Lyons was aware of Ms. Franco's protected activity, as described in detail in paragraph 82, above, including through her own express acknowledgment during the December 5, 2025 telephone call that she knew Ms. Franco had been "accusing her of discrimination" and her admission that she felt the need to "watch what she says" because Ms. Franco would "run to HR."

89. In direct response to Ms. Franco's protected activity, Defendant Lyons did not merely take isolated adverse actions against Ms. Franco. Rather, Defendant Lyons subjected Ms. Franco to a sustained and escalating campaign of retaliatory harassment, as described in

paragraph 91, below, which permeated every aspect of her working conditions and that, considered in its totality, was sufficiently severe or pervasive to alter the conditions of Ms. Franco's employment and create an abusive and hostile working environment.

90. The retaliatory hostile work environment was motivated by Defendant Lyons's desire to punish Ms. Franco for reporting that discrimination and to deter her from continuing to exercise her protected rights. The retaliatory harassment intensified in direct proportion to Ms. Franco's reports of discrimination.

91. The pattern of retaliatory harassment included, but was not limited to, the following conduct, which occurred after and in response to Ms. Franco's protected activity:

- a) Following Ms. Franco's January 25, 2024 report to Mr. Ampedu, Defendant Lyons removed Ms. Franco from her private office and relocated her to the cubicle of the recently terminated temporary employee, using a fabricated justification about a grade-level policy that did not exist.
- b) Following Ms. Franco's May 1, 2025 email to OHRM, Defendant Lyons revoked Ms. Franco's mobile clock-in and clock-out access on the same day, while allowing Mr. Reams to retain full mobile access, and provided a false explanation to justify the restriction.
- c) In the months following Ms. Franco's multiple reports to HR, Defendant Lyons systematically stripped Ms. Franco of core paralegal duties and reassigned them to Mr. Reams, withheld information necessary for Ms. Franco to perform her job, excluded Ms. Franco from meetings, refused to provide Ms. Franco with a signed copy of her Form 544, and restricted Ms. Franco's ability to communicate directly

with the Office of Law. These actions effectively hollowed out Ms. Franco's position from within while maintaining her title.

- d) In or around October 2025, after Ms. Franco followed directives from the Office of Law, Defendant Lyons cursed at Ms. Franco and hung up on her, then issued a directive requiring in-office attendance for Nuisance Abatement Board hearings that was enforced exclusively against Ms. Franco while Mr. Reams was permitted to disregard it without consequence.
- e) In or around October 2025, Defendant Lyons reported concerns about Ms. Franco's use of sick leave and requested that Ms. Franco be placed on FMLA leave without Ms. Franco's knowledge or consent, despite no disciplinary record or attendance issues, in an effort to manufacture a paper trail suggesting that Ms. Franco had attendance or medical issues.
- f) In or around November 2025, Defendant Lyons instructed Ms. Franco that she was no longer permitted to contact the Office of Law attorney for legal guidance, which stripped her of a core function of the Paralegal Supervisor position.
- g) In or around November 2025, Ms. Franco's access to view her own timecard in the Kronos/UKG system was blocked, while other employees, including Mr. Reams, retained full access, and Defendant Lyons ignored Ms. Franco's emails requesting lunch-period timecard adjustments while responding to other emails.
- h) During the December 5, 2025 telephone call, which itself constituted a two-hour session of retaliatory intimidation, Defendant Lyons told Ms. Franco she was "no longer protected by union laws"; told her to "think about what [she] want[s] to do" and whether she "would like to find another position somewhere else"; told

her that “when [she] rat[s] out people, [she] ha[s] to be careful”; confirmed that Mr. Reams was reporting Ms. Franco’s activities to Defendant Lyons; removed Ms. Franco from the snow duty volunteer overtime list; threatened that she “might not need a paralegal” and “might only need an admin”; stated that she was placing Ms. Franco on a PIP; called Ms. Franco “only good” for “showing up to work”; and told Ms. Franco that “a case file was being created against [her].”

- i) Following the December 5, 2025 call, Defendant Lyons sent an email accusing Ms. Franco of being “insubordinate,” then recalled the email in an apparent effort to avoid creating a written record of her retaliatory statements.
- j) Following Ms. Franco’s December 12, 2025 EEO complaint, Defendant Lyons interfered with the OHRM investigation by preventing Mr. Reams from appearing for his scheduled witness interview.
- k) On or about January 9, 2026, Defendant Lyons moved Ms. Franco’s belongings to her new cubicle without consent and told employees in Ms. Franco’s new department that Ms. Franco was “lazy” and “need[ed] to be watched,” poisoning her new work environment before she arrived.
- l) Following the involuntary transfer, Ms. Franco continued to be the only DPIE employee required to clock in and out at the physical kiosk, and a staff meeting on timekeeping policies was directed specifically at her — demonstrating that the retaliatory harassment followed Ms. Franco even after she was removed from Defendant Lyons’s direct supervision.

92. The retaliatory harassment was pervasive. It spanned more than two years, escalated with each successive report Ms. Franco made, and infected virtually every dimension

of her working life, including her physical workspace, her system access, her job duties, her schedule, her overtime opportunities, her communications with colleagues and attorneys, her professional reputation, and her sense of personal security in the workplace. The harassment was not confined to discrete incidents separated by periods of normalcy, it was a continuous and intensifying campaign of professional degradation and intimidation.

93. The retaliatory harassment was severe. Defendant Lyons's conduct included direct threats to Ms. Franco's employment, the systematic destruction of her professional role, the use of a coworker as a surveillance instrument, interference with an official investigation, and the deliberate contamination of her new work environment. The December 5, 2025 telephone call alone, a two-hour barrage of threats, belittlement, and express acknowledgment of discriminatory intent, would, standing by itself, constitute a severe retaliatory act. Considered alongside the full pattern of conduct, it confirms the existence of a working environment that no reasonable employee could endure without experiencing a material alteration in the conditions of her employment.

94. A reasonable employee in Ms. Franco's position would be dissuaded from making or supporting a charge of discrimination based on the retaliatory actions taken by Defendant Lyons.

95. Ms. Franco subjectively experienced the environment as one designed to deter her from exercising her protected rights, as evidenced by her severe emotional distress, her ongoing need for therapy, her episodes of breaking down at work, her fear of retaliation expressed to colleagues and Dr. Ferguson, and the toll on her personal and family life.

96. Defendant Lyons personally participated in and was the direct perpetrator of each act of retaliatory harassment described herein. Defendant Lyons was not a passive or uninvolved

supervisor, she conceived, directed, and executed the retaliatory campaign against Ms. Franco in direct response to Ms. Franco's exercise of her protected rights.

97. As a direct and proximate result of Defendant Lyons's retaliatory hostile work environment, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT IV
Race-Based Hostile Work Environment, in Violation of 42 U.S.C. § 1981
(Against Defendant County)

98. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, and 72 through 77, above.

99. A municipality may be held liable under Section 1981, by and through 42 U.S.C. § 1983, when the execution of a government policy or custom inflicts the injury, or when a final policymaker's decision causes, the deprivation of "any rights, privileges, or immunities secured by the Constitution and laws[.]"

100. Prince George's County is a "person" subject to suit under 42 U.S.C. § 1983.

101. Ms. Franco's rights to be free from racial discrimination and retaliation in the conditions, privileges, and terms of her employment, under 42 U.S.C. § 1981, were violated by the County through multiple avenues to impose municipal liability under Section 1983.

102. Defendant Lyons, as Administrative Specialist I and supervisor of the Boards and Commission Division, exercised final decision-making authority over the day-to-day terms and conditions of Ms. Franco's employment, including work assignments, system access, office location, communication restrictions, schedule modifications, recommendations for disciplinary action, and the initiation of personnel actions such as the involuntary transfer. Defendant Lyons's decisions regarding Ms. Franco's employment conditions were not reviewed, overridden, or meaningfully supervised by any higher-level County official.

103. Even if Defendant Lyons did not possess formal final policymaking authority, the County's senior officials with supervisory authority over Defendant Lyons, including Mr. Ampedu, Deputy Director Hinton, and Defendant Lyons's direct supervisor Lori Parris, were made aware of Defendant Lyons's discriminatory and retaliatory conduct on numerous occasions and took no action to investigate, correct, or override her decisions. The County's failure to review, reverse, or in any way constrain Defendant Lyons's decision-making, despite actual knowledge of her discriminatory conduct, rendered Defendant Lyons the de facto final policymaker with respect to Ms. Franco's employment conditions.

104. Municipal liability may also be established where a final policymaker ratifies a subordinate's unconstitutional actions. Ratification occurs when a final policymaker has knowledge of the constitutional violation and makes a deliberate choice to endorse or adopt the conduct as official policy.

105. The County's senior officials, including Mr. Ampedu and Deputy Director Hinton, were informed of Defendant Lyons's discriminatory and retaliatory conduct through Ms. Franco's multiple reports and her formal written complaint of November 24, 2025. These officials possessed the authority to investigate, discipline, reassign, or otherwise constrain Defendant Lyons. Instead, they took no corrective action and allowed Defendant Lyons to continue her course of discriminatory conduct without interference. Mr. Ampedu repeatedly promised to consult with Deputy Director Hinton and investigate, and repeatedly failed to do so. The County's deliberate decision to allow Defendant Lyons's conduct to continue unchecked, despite actual knowledge of its discriminatory nature, constitutes ratification of her unconstitutional actions.

106. The County further ratified Defendant Lyons's retaliatory conduct by effectuating the involuntary transfer Defendant Lyons initiated. The transfer was processed through the County's official personnel channels, approved by County officials, and communicated to Ms. Franco through an official transfer letter. The County thus adopted and implemented the retaliatory action as its own official act.

107. Upon information and belief, the involuntary transfer of Ms. Franco from the Boards and Commission Division to the QAQC Unit was approved and authorized by Lori Parris, who possessed final policymaking authority with respect to personnel actions within DPIE. This official approved the transfer with knowledge that Ms. Franco had filed a formal EEO complaint with OHRM approximately 27 days earlier, and the decision to effectuate the transfer was not subject to meaningful review by any higher-level County authority.

108. Municipal liability may also be established where a persistent and widespread practice of municipal officials is so common and well-settled as to constitute a custom that fairly represents municipal policy, even without formal authorization.

109. The County maintained a custom, practice, and pattern of deliberate indifference to complaints of race discrimination and retaliation within DPIE. This custom is evidenced by the following:

- a) Mr. Ampedu, the department-level HR Director, received reports of discrimination from Ms. Franco on at least four occasions between 2024 and 2025, including a detailed formal written complaint on November 24, 2025. On each occasion, Mr. Ampedu stated he would consult with Deputy Director Hinton and investigate. On no occasion did he follow through, and no investigation was ever conducted at the department level.

- b) HR Supervisor Thelia Jones received reports of discrimination from Ms. Franco on approximately five occasions between 2024 and 2025. Rather than investigating or escalating these complaints, Ms. Jones actively discouraged Ms. Franco from pursuing her rights, telling Ms. Franco that an EEOC complaint would “go up to OHRM and then get lost” and advising Ms. Franco not to document incidents in writing because it would “just be she said, she said.”
- c) Deputy Director Hinton was directly informed of Ms. Franco’s concerns during the February 2, 2024 meeting, during which he made a demeaning remark to Ms. Franco rather than addressing the discrimination she reported. Mr. Ampedu repeatedly stated he would consult Mr. Hinton about Ms. Franco’s subsequent reports, but no action was ever taken.
- d) When Ms. Franco escalated her complaint to OHRM, the County’s designated EEO investigator, Ms. Jelinek, made her own discriminatory comments during the intake of Ms. Franco’s complaint, required Ms. Franco to sign a confidentiality agreement as a precondition to filing, and failed to communicate any results of the investigation to Ms. Franco despite the passage of more than two months.

110. The County’s pattern of inaction created a predictable cycle: (a) Ms. Franco would report discrimination; (b) the County would promise to investigate; (c) the County would fail to investigate; (d) the discrimination and retaliation would escalate; and (e) Ms. Franco would be forced to report again, only to receive the same response. This cycle repeated itself over a period of more than two years, across multiple levels of the County’s HR and management structure.

111. The County's deliberate indifference to Ms. Franco's complaints was the moving force behind the ongoing violations of federal law she suffered. Had the County investigated Ms. Franco's initial reports in January 2024 and taken appropriate corrective action, the subsequent two years of escalating discrimination and retaliation would have been prevented. The County's persistent refusal to act, despite actual and repeated notice of Defendant Lyons's conduct, enabled and emboldened the constitutional violations alleged herein.

112. Upon information and belief, the County's pattern of deliberate indifference to complaints of discrimination within DPIE was not limited to Ms. Franco's experience. Other employees within DPIE who reported discrimination or harassment to departmental HR or OHRM experienced a similar failure to investigate and a similar pattern of inaction, the details of which will be established through discovery. The County's systemic failure to investigate, remedy, or even acknowledge discrimination complaints within DPIE reflects an institutional practice so persistent and widespread that it constitutes a de facto policy of tolerating unlawful discrimination.

113. As a direct and proximate result of the County's policies, customs, and practices, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT V
Retaliation in Violation of 42 U.S.C. § 1981
(Against Defendant County)

114. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, and 81 through 84, above.

115. Ms. Franco engaged in protected activity by opposing and reporting racial discrimination in the terms and conditions of her employment, as described in detail in paragraph 81, above.

116. The County, through its officials and employees, subjected Ms. Franco to materially adverse actions in retaliation for her protected activity, as described in detail in paragraph 83, above.

117. The County is liable for the retaliatory actions taken against Ms. Franco under the same theories of municipal liability set forth in paragraphs 102 through 112, incorporated herein, each of which independently establishes the County's responsibility for the retaliation Ms. Franco suffered.

118. The County's liability for retaliation is particularly evident in its effectuation of the involuntary transfer. The transfer was processed through the County's official personnel channels, approved by County officials, and communicated to Ms. Franco through an official transfer letter just twenty-seven days after she filed her EEO complaint. The County's HR department subsequently directed Ms. Franco's new supervisor to change only the duties on her Form 544 while preserving the classification title. This was a deliberate effort to obscure the retaliatory nature of the constructive demotion.

119. The County further facilitated retaliation by conditioning Ms. Franco's ability to file her EEO complaint on signing a confidentiality agreement that threatened termination for disclosure of information related to the investigation. This agreement, imposed as a precondition to Ms. Franco's exercise of her right to file a discrimination complaint, had a chilling effect on Ms. Franco's ability to consult with counsel, communicate with potential witnesses, and seek support, and constituted an independent act of retaliation for her protected activity.

120. As a direct and proximate result of the County's retaliatory conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT VI
Hostile Work Environment in Violation of Title VII of the Civil Rights Act of 1964
(Against Defendant County)

121. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

122. Title VII of the Civil Rights Act of 1964, as amended, prohibits employers from subjecting employees to a hostile work environment based on race, color, religion, sex, or national origin.

123. The allegations set forth in paragraphs 71 through 77, incorporated herein, also establish that the County subjected Ms. Franco to a hostile work environment based on her race/ethnicity and national origin, in violation of Title VII.

124. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT VII
Discrimination in Violation of Title VII of the Civil Rights Act of 1964
(Against Defendant County)

125. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

126. 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.

127. The County, through the actions of Defendant Lyons and other County officials, subjected Ms. Franco to adverse employment actions with respect to the terms, conditions, and privileges of her employment because of her race and national origin. These adverse actions included, but were not limited to, the following: (a) the systematic stripping of Ms. Franco's core

paralegal duties and their reassignment to Mr. Reams, a non-Hispanic employee who was neither trained nor hired as a paralegal; (b) the revocation of Ms. Franco's mobile clock-in and clock-out access while Mr. Reams and other non-Hispanic employees retained full access; (c) the selective enforcement of in-office attendance directives against Ms. Franco while Mr. Reams was permitted to disregard the same directives without consequence; (d) the alteration of Ms. Franco's telework schedule to impose additional in-office coverage requirements not imposed on Mr. Reams; (e) the removal of Ms. Franco from the snow duty volunteer overtime list, depriving her of overtime compensation opportunities available to her non-Hispanic colleagues; (f) the restriction of Ms. Franco's ability to communicate with the Office of Law, a core function of the Paralegal Supervisor position, while no similar restriction was imposed on any other employee; and (g) the involuntary transfer of Ms. Franco to the QAQC Unit, where her duties were reduced to reviewing construction applications and performing administrative tasks bearing no relation to the paralegal work for which she was hired.

128. The adverse employment actions described in paragraph 127, above, were motivated by Ms. Franco's race and national origin. The causal connection between Ms. Franco's protected characteristics and the County's discriminatory conduct is established by, among other things, the following: (a) Defendant Lyons's racially explicit statements, including referring to Ms. Franco as "the new Spanish bitch on the 5th floor" who was "trying to get all the Black people fired"; (b) Defendant Lyons's repeated references to immigration enforcement and ICE raids directed specifically at Ms. Franco because of her Latino ethnicity; (c) Defendant Lyons's statement that her "cleaning lady got deported because she's Latina" and her warning to Ms. Franco to "be careful"; (d) the consistent pattern of preferential treatment afforded to Mr. Reams, a Black male employee, with respect to system access, duty assignments, schedule enforcement,

and disciplinary oversight, as compared to the restrictions and adverse actions imposed on Ms. Franco; (e) the complete absence of any documented performance deficiency, formal discipline, or legitimate business justification for any of the adverse actions taken against Ms. Franco; and (f) the County's shifting and pretextual justifications for its conduct, which are belied by Ms. Franco's clean employment record and the favorable treatment of similarly situated non-Hispanic employees.

129. Ms. Franco was treated less favorably than similarly situated employees outside her protected class. Mr. Reams, a Black male employee who held an administrative position under Defendant Lyons's supervision, was permitted to retain mobile clock-in and clock-out access, was not subjected to selective enforcement of attendance or in-office directives, was assigned duties beyond his job classification without restriction, was not removed from overtime opportunities, was not barred from communicating with the Office of Law, and was not subjected to threats of a Performance Improvement Plan, FMLA referral, or involuntary transfer. The disparity between the County's treatment of Ms. Franco and its treatment of Mr. Reams, under materially identical circumstances and reporting to the same supervisor, gives rise to a strong inference of unlawful discrimination based on race and national origin.

130. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT VIII
Retaliation in Violation of Title VII of the Civil Rights of 1964
(Against Defendant County)

131. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

132. 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 unlawful discriminatory practices, making a complaint of discrimination whether through formal or informal channels, or participating in proceedings related to complaints of discrimination based on race, color, religion, sex, or national origin.

133. The allegations set forth in paragraphs 81 through 84, incorporated herein, also establish that the County unlawfully retaliated against Ms. Franco, in violation of Title VII.

134. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT IX
Retaliatory Hostile Work Environment in Violation of Title VII
(Against Defendant County)

135. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

136. 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 unlawful discriminatory practices, making a complaint of discrimination whether through formal or informal channels, or participating in proceedings related to complaints of discrimination based on race, color, religion, sex, or national origin.

137. A retaliatory hostile work environment claim arises when an employer, rather than taking a single discrete retaliatory act, subjects an employee to a pattern of retaliatory harassment that is sufficiently severe or pervasive that it would dissuade a reasonable worker from making or supporting a charge of discrimination.

138. The allegations set forth in paragraphs 88 through 96, incorporated herein, also establish that the County subjected Ms. Franco to an unlawful hostile work environment based on her race/ethnicity and national origin, in violation of Title VII.

139. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT X

**Hostile Work Environment in Violation of the Maryland Fair Employment Practices Act
(Against Defendant County)**

140. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

141. The Maryland Fair Employment Practices Act ("MFEPA"), Md. Code Ann., State Gov't § 20-606(a)(1), prohibits employers from subjecting employees to a hostile work environment based on race, color, religion, sex, or national origin.

142. The allegations set forth in paragraphs 71 through 77, incorporated herein, also establish that the County subjected Ms. Franco to an unlawful hostile work environment, in violation of MFEPA.

143. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT XI

**Discrimination in Violation of the Maryland Fair Employment Practices Act, Md. Code
Ann., State Gov't § 20-606(a)(1)
(Against Defendant County)**

144. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

145. 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).

146. The allegations set forth in paragraphs 127 through 129, incorporated herein, also establish that the County unlawfully discriminated against Ms. Franco, in violation of MFEPA.

147. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT XII

**Retaliation in Violation of the Maryland Fair Employment Practices Act, Md. Code Ann.,
State Gov't § 20-606(f)
(Against Defendant County)**

148. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

149. 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]."

150. The allegations set forth in paragraphs 81 through 84, incorporated herein, also establish that the County unlawfully retaliated against Ms. Franco, in violation of MFEPA.

151. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT XIII

**Hostile Work Environment in Violation of the Prince George's County Code § 2-222
(Against Defendant County)**

152. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

153. Under Maryland law, a person that is subjected to a discriminatory act prohibited by Prince George's 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.

154. The Prince George's County Code prohibits employers from subjecting an employee to a hostile work environment based on, among other things, the employee's race/ethnicity, age, or national origin.

155. The allegations set forth in paragraphs 71 through 77, incorporated herein, also establish that the County subjected Ms. Franco to a hostile work environment, in violation of PGC Code § 2-222.

156. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT XIV
Discrimination in Violation of the Prince George's County Code § 2-222
(Against Defendant County)

157. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

158. Section 2-222 of the Prince George's County Code prohibits discrimination in employment based on race, religion, color, sex, national origin, age, occupation, familial status, marital status, political opinion, personal appearance, sexual orientation, or physical or mental handicap.

159. The allegations set forth in paragraphs 127 through 129, incorporated herein, also establish that the County unlawfully discriminated against Ms. Franco, in violation of PGC Code § 2-222.

160. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

COUNT XV
Retaliation in Violation of the Prince George's County Code § 2-209
(Against Defendant County)

161. Ms. Franco incorporates herein the allegations set forth in paragraphs 1 through 68, above.

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

163. Section 2-209 of the Prince George's County Code prohibits an employer like the County from retaliating against employees who engage in certain protected activities, which include opposing unlawful discriminatory practices, making a complaint of discrimination whether through formal or informal channels, or participating in proceedings related to complaints of discrimination based on race, color, religion, sex, or national origin.

164. The allegations set forth in paragraphs 81 through 84, incorporated herein, establish that the County unlawfully retaliated against Ms. Franco, in violation of PGC Code § 2-209.

165. As a direct and proximate result of the County's wrongful conduct, Ms. Franco has suffered and continues to suffer substantial harm.

PRAYER FOR RELIEF

Plaintiff Sofia Franco respectfully requests that the Court enter judgment on this Complaint, in favor of the Plaintiff and against Defendants Prince George's County, Maryland and Michelle Lyons, as follows:

A. Declare that Defendants violated Plaintiff's rights under 42 U.S.C. § 1981, 42 U.S.C. § 1983, the Maryland Fair Employment Practices Act, Md. Code Ann., State Gov't § 20-601 *et seq.*, and the Prince George's County Human Rights Act, PGC Code §§ 2-185 *et seq.*, by subjecting Plaintiff to discrimination, retaliation, and a hostile work environment based on her race and national origin;

B. Declare that Prince George's County, Maryland maintained a policy, custom, or practice of deliberate indifference to complaints of race discrimination and retaliation within the Department of Permitting, Inspections and Enforcement, in violation of 42 U.S.C. § 1983;

C. Declare that the confidentiality agreement required by the County as a precondition to filing Plaintiff's EEO complaint was unlawful and unenforceable;

D. Award Plaintiff appropriate amounts of lost overtime compensation, in fair and reasonable amounts to be determined at trial;

E. Award Plaintiff compensatory damages for the emotional distress, anxiety, humiliation, dignitary harm, reputational harm, loss of professional development, and other injuries she suffered as a result of Defendants' conduct, in fair and reasonable amounts to be determined at trial;

F. Award Plaintiff punitive damages against Defendant Michelle Lyons, in her individual capacity, in an amount that sufficiently punishes, penalizes, and deters her unlawful conduct;

G. Award Plaintiff the costs and fees she incurred in connection with this action, including reasonable attorney fees;

H. Permanently enjoin Defendants from engaging in further acts of discrimination, retaliation, and hostile work environment conduct against Plaintiff and other employees;

I. Order Prince George's County, Maryland to reinstate Plaintiff to her prior Paralegal Supervisor duties within the Boards and Commission Division or, in the alternative, to a comparable position utilizing her paralegal training and skills, with full restoration of all system access, privileges, and workplace rights;

J. Order Prince George's County, Maryland to restore Plaintiff's access to the mobile clock-in and clock-out feature, timecard viewing access, and all other workplace system privileges on the same terms as similarly situated employees;

K. Order Prince George's County, Maryland to expunge from Plaintiff's personnel file any and all references to the pretextual Performance Improvement Plan, FMLA referral, and other adverse notations that were generated as a result of Defendants' retaliatory conduct;

L. Order Prince George's County, Maryland to implement and enforce adequate policies and procedures for the investigation and resolution of employee complaints of discrimination and retaliation within DPIE, including mandatory training for all HR and supervisory personnel;

M. Order Prince George's County, Maryland to rescind and discontinue use of the confidentiality agreement required as a precondition to filing EEO complaints through the Office of Human Resources Management; and

N. Grant Plaintiff such other relief as the Court deems just and proper, including additional injunctive and declaratory relief as may be required in the interest of justice.

DEMAND FOR JURY TRIAL

In accordance with Maryland Rule 2-325(a), Plaintiff hereby elects a trial by jury on all issues herein triable of right by a jury.

Dated: March 9, 2026

/s/ Jordan D. Howlette
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