UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SOFIA FRANCO,

Plaintiff,

v.

PRINCE GEORGE'S COUNTY, MARYLAND,

Defendant.
_____/

Case No. 8:26-cv-4227

COMPLAINT

Plaintiff Sofia Franco ("Franco"), for her complaint against Defendant Prince George's County, Maryland (the "County"), alleges the following:

1. After Franco filed a charge of discrimination and a subsequent complaint on March 9, 2026, and after her employment with the County ended, the County did not pay Franco for her accrued annual leave totaling $15,544.80.

2. Franco elected to receive that leave as a lump-sum cash payment on the County's Employee Separation Form, and the Prince George's County Code requires the payment.

3. The County has not paid it and has not disputed that it is owed, and after the Department of Permitting, Inspections and Enforcement ("DPIE") agreed on June 3, 2026 that the County's Office of Human Resources Management ("OHRM") should proceed with Franco's resignation letter as submitted, the County has stated no reason for continuing to withhold it.

4. Franco asserts four claims against the County for violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-3(a); the Maryland Fair Employment Practices Act ("MFEPA"), Md. Code Ann., State Gov't § 20-606(f); the Prince George's County Code,

enforced through Md. Code Ann., State Gov't § 20-1202; and 42 U.S.C. § 1981, enforced through 42 U.S.C. § 1983.

JURISDICTION AND VENUE

5. The Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1343(a)(3)–(4) because Franco's Title VII and Section 1981 claims arise under federal law. The Court has supplemental jurisdiction over Franco's state law claims under 28 U.S.C. § 1367(a) because those claims arise from the same facts as the federal claims and form part of the same case or controversy as the federal claims.

6. Venue is proper under 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000e-5(f)(3) because the County is located within this judicial district, and because the unlawful employment practice alleged here was committed in this judicial district.

PARTIES

7. Plaintiff Sofia Franco was employed by Prince George's County Government as a Paralegal Supervisor, Grade G-18, within DPIE from January 2023 through May 11, 2026. Ms. Franco resides in Prince George's County, Maryland.

8. Defendant Prince George's County, MD 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.

BACKGROUND

9. On February 22, 2026, Franco filed EEOC Charge No. 832-2026-00152 against the County. The charge alleged race and national origin discrimination, a hostile work environment, and retaliation.

10. On March 5, 2026, the U.S. Department of Justice issued a Notice of Right to Sue on that charge. Stephen J. Williams, Deputy County Attorney, was copied on the notice.

11. On March 9, 2026, Franco filed a complaint in the Circuit Court for Prince George's County as Case No. C-16-CV-26-001360. She asserted claims under Title VII, 42 U.S.C. §§ 1981 and 1983, MFEPA, and the Prince George's County Code.

12. On April 17, 2026, the County removed that action to this Court, where it remains pending as Case No. 8:26-cv-01507-TDC (hereinafter referred to as the "Initial Action"). This Complaint refers to Franco's complaint in the Initial Action as the "Initial Complaint."

13. On May 21, 2026, the County filed its Answer in the Initial Action.

Franco's Separation and Leave Election

14. On April 21, 2026, Franco gave the County written notice of her resignation from her position in DPIE's Quality Assurance and Quality Control Unit, effective May 11, 2026. Franco emailed the resignation letter to her supervisor in that unit, Bosa Ugo, and copied Thelia Jones, the Departmental Human Resources Liaison in DPIE's Administrative Services Division. According to Jones, the letter constituted proper notice of Franco's separation. No County official has asserted that the notice was untimely or otherwise improper. Franco's employment with the County ended on May 11, 2026. Attached hereto as Exhibit 1 is a true and correct copy of Franco's resignation letter.

15. On April 30, 2026, Franco completed and signed the County's Office of Human Resources Management Employee Separation Form, PGC Form 4281 (the "Separation Form"). Attached hereto as Exhibit 2 is a true and correct copy of the Separation Form.

16. In the Leave Disposition section of the Separation Form, Franco elected a "[l]ump sum cash payment of new annual leave up to 360 hours." In the Disbursement of Final Pay/Leave Check section, Franco elected direct deposit.

17. The Separation Form contains a box labeled "Ineligible for Payment," with a space to state a reason. That box is not checked, and no reason is stated.

18. Jones signed the Separation Form as Franco's Departmental HR Liaison on April 30, 2026, and noted on the form that all items of County property had been returned. Jones is the same DPIE human resources official to whom Franco reported the conduct of her former supervisor, Michelle Lyons, on approximately five occasions and who told Franco that an EEOC complaint would "go up to OHRM and then get lost."

19. The Separation Form states that the authorization "becomes irrevocable ten (10) working days after my separation date." Franco did not revoke her election.

20. Section 16-220(i) of the Prince George's County Code provides for payment of accumulated annual leave to an employee upon separation from County service, in accordance with Section 16-221.02. Section 16-221.02(a) states, in relevant part, that

> The annual and sick leave balances accumulated by an employee shall, upon the employee's separation from employment, with proper notice of separation as determined by the employee's appointing authority, be liquidated in the following manner: . . . (3) [e]xcept in the case of an employee who is entitled to credit for sick and annual leave balances under the terms of an applicable County sponsored pension plan, the employee may elect to receive cash payment for all or any portion of the employee's annual leave balance in an amount equal to the total number of unused annual leave hours multiplied by the employee's final base hourly rate of pay . . . .

21. At separation, Franco had 360 hours of accrued annual leave eligible for lump-sum payment. At her final hourly rate of $43.18, those hours are valued at $15,544.80. Franco elected to receive a lump-sum cash payment for all 360 hours. Franco was not entitled to credit for her sick and annual leave balances under the terms of any County-sponsored pension plan,

because her County service, which began in or around January 2023 and ended on May 11, 2026, was not long enough for her to vest. Franco therefore satisfied each condition under Prince George's County Code § 16-221.02(a)(3): she gave written notice of separation that DPIE accepted as submitted, she was not entitled to pension credit for her leave balances, and she made a written election on the Separation Form. DPIE's acceptance came on June 3, 2026, when Jones informed Franco in writing that she would contact OHRM "to let them know to proceed with the resignation letter as is."

The County's Failure to Pay

22. The first regular County payday after Franco's separation was on or about May 29, 2026. That payday was eight days after the County filed its Answer in the Initial action.

23. The County paid Franco's final regular salary through May 11, 2026.

24. The County did not pay Franco's accrued annual leave on May 29, 2026, or on any payday since.

25. In or around the week of May 25, 2026, Jones spoke with Franco about her resignation. DPIE indicated to Franco that the County would not process her leave payout unless she submitted a revised resignation letter.

26. On June 3, 2026, Jones emailed Franco, "following up on the conversation last week regarding your resignation." Jones asked Franco to "send a new resignation letter if you resigned due to a job opportunity," stated that "[i]f you did not resign due to a job opportunity, your letter can remain the same," and wrote that "OHRM would like to officially close your account and can't do so until we verify this information with you." Attached hereto as Exhibit 3 is a true and correct copy of the June 3, 2026 resignation email exchange.

27. Franco responded the same day. She declined to submit a revised resignation letter containing additional language about the reasons for her separation, stated that her April 21, 2026 letter was timely and accurately reflected her resignation, disputed that any revision was a lawful prerequisite to payment of compensation she had already earned, asked that the County promptly process the payout, and directed further communications to her counsel. Franco did not resign due to a job opportunity.

28. Within minutes, Jones replied that "the request to update your reason for departure is an OHRM request not a DPIE request," and that she would "contact OHRM to let them know to proceed with the resignation letter as is." After June 3, 2026, no County official asked Franco or her counsel for any further information about her separation.

29. On June 16, 2026, Franco's counsel sent Deputy County Attorney Stephen J. Williams of the Prince George's County Office of Law a written demand for payment by email (the "Demand Letter"). The Demand Letter stated that the County had not paid Franco's accrued annual leave following her separation from DPIE, enclosed her signed Separation Form, stated that the next regular payday after her separation had passed, and requested payment within 15 days. Attached hereto as Exhibit 4 is a true and correct copy of the Demand Letter.

30. The County did not pay. It did not dispute the amount owed, did not state any basis for withholding the payment, and did not respond to the demand.

31. The Office of Law, which received the demand, is the office representing the County in the Initial Action.

32. Upon information and belief, OHRM pays separating County employees who have not filed charges of discrimination or lawsuits against the County their accrued annual leave through the County's regular payroll cycle. For example, in April 2024, Franco's brother,

Teodulo Orosco Guzman, separated from DPIE, the agency where Franco worked, and OHRM paid Mr. Orosco Guzman's accrued annual leave within 30 days of his separation. In February 2026, Anderson De Castro separated from DPIE, and OHRM paid Mr. De Castro's accrued annual leave within 30 days of his separation. Neither Mr. Orosco Guzman nor Mr. De Castro had filed a charge of discrimination or a lawsuit against the County.

33. OHRM is responsible for approving and processing separation leave payouts. OHRM knew of Franco's protected activity before the May 29, 2026 payday. On December 12, 2025, Franco filed a formal EEO complaint with OHRM, which OHRM's investigator, Suzette Jelinek, investigated, and on April 8, 2026, OHRM issued a Final Decision on that complaint. Attached hereto as Exhibit 5 is a true and correct copy of OHRM's Final Decision.

34. On July 28, 2026, Franco filed EEOC Charge No. 832-2026-00335. The charge alleged that the County was withholding her accrued annual leave payout in retaliation for her February 22, 2026 charge and the Initial Action.

35. As of the date of this Complaint, the County has not paid Franco any portion of her accrued annual leave.

36. Since June 3, 2026, the County has not given Franco or her counsel any reason for withholding the payment. After sending the Demand Letter, Franco's counsel made two further inquiries about the payment and received no response. On September 16, 2026, Franco's counsel emailed Attorneys M. David Lyles and T'Aria S. Reynolds of the Prince George's County Office of Law, attaching the Demand Letter, the Separation Form, Charge No. 832-2026-00335, and the August 18, 2026 Notice of Right to Sue. The email stated that Franco had not been paid and had not been told when she would be paid. It also stated that neither the Demand Letter nor counsel's two later inquiries had received a response, and that Franco would file a retaliation claim unless she heard from the County about the status of the payment. The County did not respond and did

not pay.

Harm Caused

37. The County's withholding has deprived Franco of $15,544.80 in earned compensation. She has also been deprived of the use of those funds since on or about May 29, 2026.

38. The withholding has caused Franco financial hardship. Because the County withheld the payment, Franco defaulted on her credit card and car loan payments, could not pay her daughter's private school tuition, and had to transfer her daughter to public school. Franco also had to borrow money from family members to pay her rent.

39. The withholding has compounded the emotional distress for which Franco has been in therapy for approximately two years.

Administrative Exhaustion and Notice

40. Franco filed Charge No. 832-2026-00335 on July 28, 2026, within 180 days after the County first failed to pay her. Franco requested that the charge be filed with both the EEOC and any applicable state or local agency.

41. On August 18, 2026, the U.S. Department of Justice, Civil Rights Division, issued Franco a Notice of Right to Sue under Title VII on Charge No. 832-2026-00335. Franco's counsel received the notice by email that day. Franco files this Complaint within 90 days of receiving the notice.

42. Under the EEOC's work-sharing agreements with each agency, Charge No. 832-2026-00335 was dual filed with the Maryland Commission on Civil Rights and with the Prince George's County Office of Human Rights, the County unit responsible for handling violations of the County's discrimination laws. More than 45 days have elapsed since the charge was filed with the Office of Human Rights. In addition, the withholding alleged in this Complaint is

retaliation for, among other things, Charge No. 832-2026-00152, which Franco filed on February 22, 2026, more than 180 days before the filing of this Complaint. The filing of the charge with the Maryland Commission on Civil Rights independently satisfies the 45-day prerequisite to this action.

43. On June 16, 2026, Franco gave the County written notice of her claim by emailing the Demand Letter described in paragraph 29 to the Deputy County Attorney at the Prince George's County Office of Law, which received it. The Demand Letter stated the time, place, and cause of Franco's injury: the County's failure to pay her accrued annual leave following her separation from DPIE, after the next regular payday following her separation had passed. On July 28, 2026, Franco filed Charge No. 832-2026-00335, which stated that the County was withholding her accrued annual leave in retaliation for her protected activity, and the County received notice of that charge on or about July 30, 2026.

COUNT I
Retaliation in Violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-3(a)
(Against Defendant County)

44. Franco incorporates herein the allegations set forth in paragraphs 1 through 43, above.

45. Title VII prohibits an employer from discriminating against an employee because the employee has made a charge or participated in any manner in a Title VII proceeding, or has opposed a practice Title VII makes unlawful. The prohibition protects former employees.

46. The County is an "employer" under Title VII because it employs more than 15 individuals.

47. Franco engaged in protected activity under Title VII by: (1) filing EEOC Charge No. 832-2026-00152 on February 22, 2026; (2) filing the Initial Complaint in the Initial Action on March 9, 2026; and (3) pursuing the relief requested in the Initial Complaint.

48. The County knew of Franco's protected activity before it failed to pay her on May 29, 2026. The County received the February 22, 2026 charge. Its Deputy County Attorney was copied on the EEOC's March 5, 2026 Notice of Right to Sue. The County removed the Initial Action on April 17, 2026, and answered it on May 21, 2026. The Office of Law, which represents the County in the Initial Action, received Franco's demand for payment on or about June 16, 2026.

49. The County took a materially adverse action against Franco by withholding $15,544.80 in earned compensation that the County Code required it to pay. Withholding a former employee's final compensation might well have dissuaded a reasonable worker from making or supporting a charge of discrimination.

50. Franco's protected activity was the but-for cause of the withholding. The following facts support that causal connection: (a) the County first failed to pay on or about May 29, 2026, the first regular payday after Franco's separation and about eleven weeks after she filed the Initial Action, and the County made that decision between April 30, 2026, when Jones signed the Separation Form, and May 29, 2026, a period during which the County removed the Initial Action and answered it; (b) the payment is mandated by the County Code, Franco satisfied each condition the Code imposes, and the Separation Form does not designate her as ineligible for payment; (c) DPIE's Departmental HR Liaison signed the Separation Form and certified that Franco had returned all County property; (d) the County processed Franco's separation and paid her final regular salary through May 11, 2026, but omitted only the leave payout; (e) the only condition any County official placed on the payment was OHRM's request, made after Franco's separation and while the County was defending the Initial Action, that Franco revise her resignation letter to state whether she had resigned for a job opportunity; (f) after DPIE agreed on June 3, 2026, that OHRM should proceed with the letter as submitted, the County still did not pay and has stated no reason since; (g) the County neither paid nor responded after receiving the

Demand Letter, which enclosed the Separation Form, and it continued to withhold the payment after Franco's July 28, 2026 charge identified the withholding as retaliatory; and (h) upon information and belief, separating employees who had not engaged in protected activity received their payouts in the ordinary course.

51. As a direct and proximate result of the County's retaliation, Franco has suffered and continues to suffer substantial harm.

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

52. Franco incorporates herein the allegations set forth in paragraphs 1 through 43, above.

53. The Maryland Fair Employment Practices Act prohibits an employer from retaliating against an individual because the individual has opposed a practice MFEPA prohibits, or has made a charge or participated in any manner in an investigation, proceeding, or hearing under MFEPA.

54. The County is an "employer" under MFEPA because it employs more than 15 individuals.

55. Franco engaged in activity protected by MFEPA by: (1) filing EEOC Charge No. 832-2026-00152 on February 22, 2026; (2) filing the Initial Complaint in the Initial Action on March 9, 2026; and (3) pursuing the relief requested in the Initial Complaint.

56. For the reasons alleged in paragraph 50, incorporated herein, the County withheld Franco's accrued annual leave payout because of her protected activity.

57. As a direct and proximate result of the County's retaliation, Franco has suffered and continues to suffer substantial harm.

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

58. Franco incorporates herein the allegations set forth in paragraphs 1 through 43, above.

59. Section 20-1202(b) of Maryland's State Government Article authorizes a person subjected to a discriminatory act prohibited by the Prince George's County Code to bring a civil action against the person that committed the act. The action may seek damages, injunctive relief, or other civil relief.

60. Section 2-209 of the Prince George's County Code prohibits retaliation against a person who has opposed a discriminatory practice, or who has filed a complaint or participated in a proceeding under the County's human rights law.

61. Franco engaged in activity protected by the County Code by: (1) filing EEOC Charge No. 832-2026-00152 on February 22, 2026; (2) filing the Initial Complaint in the Initial Action on March 9, 2026; and (3) pursuing the relief requested in the Initial Complaint.

62. For the reasons alleged in paragraph 50, incorporated herein, the County withheld Franco's accrued annual leave payout because of her protected activity.

63. As a direct and proximate result of the County's retaliation, Franco has suffered and continues to suffer substantial harm.

COUNT IV
Retaliation in Violation of 42 U.S.C. § 1981, Enforced through 42 U.S.C. § 1983
(Against Defendant County)

64. Franco incorporates herein the allegations set forth in paragraphs 1 through 43, above.

65. Section 1981 of Title 42 of the United States Code guarantees all persons the same right to make and enforce contracts as is enjoyed by white citizens. That right includes the enjoyment of all benefits, privileges, terms, and conditions of the contractual relationship. Section 1981 prohibits retaliation against a person who opposes race discrimination in a contractual relationship, including an employment relationship.

66. Section 1981 protects against discrimination based on ancestry and ethnic characteristics. Ms. Franco is a member of a protected class under Section 1981 based on her status as a Hispanic/Latina woman.

67. The County is a "person" under 42 U.S.C. § 1983 and acted under color of state law at all times relevant to this count.

68. Franco's employment with the County was a contractual relationship within the meaning of Section 1981. Payment of accrued annual leave upon separation, under Sections 16-220(i) and 16-221.02 of the County Code, is a benefit, privilege, term, and condition of that relationship. Franco earned her 360 hours of annual leave through her service. The payment became due when she separated from County service with notice that DPIE accepted and made the election described in paragraphs 15 through 21.

69. Franco engaged in activity protected by Section 1981 by opposing discrimination against her because of her race and ethnicity. That activity included: (a) the EEO complaint she filed with OHRM on December 12, 2025; (b) the EEOC Charge No. 832-2026-00152, filed on February 22, 2026, which alleged race discrimination; and (c) filing the Initial Complaint, which asserts claims under Section 1981 in Counts I through V of the Initial Complaint.

70. The County knew of Franco's protected activity before it withheld her payout. OHRM received and investigated her December 12, 2025 EEO complaint and issued a Final

Decision on it on April 8, 2026, as alleged in paragraph 33. The County also knew of her protected activity through the facts alleged in paragraph 48.

71. The County subjected Franco to a materially adverse action by withholding $15,544.80 in earned compensation that the County Code required it to pay, as alleged in paragraph 49. The withholding impaired Franco's right to enforce her employment contract and to enjoy its benefits.

72. Franco's protected activity was the but-for cause of the withholding. But for that activity, the County would have paid her accrued annual leave on or about May 29, 2026, as it paid separating DPIE employees who had not engaged in protected activity. The facts alleged in paragraph 50 support this causal connection.

73. The County is liable under Section 1983 because an official with final policymaking authority over separation leave payouts made the decision to withhold Franco's payout. Under the Charter of Prince George's County, OHRM is headed by the Director of Human Resources Management. The Director is the County's Personnel Officer and is responsible for administering the County's personnel system. Payment of accumulated annual leave upon separation is part of that system, and OHRM approves and processes separation leave payouts, as alleged in paragraph 33.

74. Upon information and belief, the Director of OHRM, or an OHRM official to whom the Director delegated final authority over separation leave payouts, made or approved the decision to withhold Franco's payout. That decision had two parts. The first was OHRM's demand, made after Franco separated, that she revise her resignation letter. The second was OHRM's continued refusal to pay after DPIE, Franco's employing department, agreed on June 3, 2026, that OHRM should proceed with the letter as submitted, as alleged in paragraphs 25

through 28. The identity of the official who made the decision is within the County's exclusive knowledge.

75. The decision was final. The County never issued Franco a written decision denying or conditioning the payment. It has stated no reason for the withholding since June 3, 2026, and it never identified any procedure through which Franco could seek review. Upon information and belief, no higher County authority reviewed, constrained, or reversed the decision.

76. In the alternative, the County ratified the withholding. By June 16, 2026, the Office of Law had received the Demand Letter, which enclosed the Separation Form and stated the amount owed, as alleged in paragraph 29. By July 28, 2026, the County had received Franco's charge identifying the withholding as retaliation for her protected activity, as alleged in paragraph 34. Upon information and belief, the Director of OHRM and other County officials with final authority over separation payouts learned through those communications that the payout was being withheld and that no lawful basis for withholding it existed. They approved the continued withholding, and the reasons for it, rather than paying Franco. That deliberate choice made the withholding the County's own act.

77. The County's final decision, and in the alternative its ratification of that decision, was the moving force behind the violation of Franco's rights under Section 1981.

78. As a direct and proximate result of the County's retaliation, Franco has suffered and continues to suffer substantial harm.

PRAYER FOR RELIEF

For the foregoing reasons, Franco respectfully requests that the Court enter judgment on this Complaint, in her favor and against the County on this Complaint, as follows:

A. Declare that the County violated 42 U.S.C. §§ 1981 and 2000e-3(a), Md. Code Ann., State Gov't § 20-606(f), and Prince George's County Code § 2-209 by withholding Franco's accrued annual leave payout in retaliation for her protected activity;

B. Order the County to pay Franco the full value of the accrued annual leave she elected on the Separation Form, in the amount of $15,544.80;

C. Award Franco compensatory damages for the financial hardship, emotional distress, and other harm caused by the County's retaliation, in an amount to be determined at trial;

D. Award Franco pre-judgment interest, including interest on the withheld payment from May 29, 2026, and post-judgment interest;

E. Award Franco her costs and reasonable attorney fees;

F. Permanently enjoin the County from further retaliating against Franco, including by withholding any other compensation or benefits due to her upon separation and by providing adverse employment references; and

G. Grant Franco such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Under Federal Rule of Civil Procedure 38(b), Franco demands a trial by jury on all issues so triable in this Complaint.

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Dated: October 7, 2026

/s/ Jordan D. Howlette
JORDAN D. HOWLETTE
D. Md. Bar No.: 21634
Justly Prudent
420 Florida Ave. NE, Suite 27
Washington, DC 20002
Tel: (202) 921-6005
Fax: (202) 921-7102
jordan@justlyprudent.com
Counsel for Plaintiff

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Sofia Franco

(b) County of Residence of First Listed Plaintiff Prince George's County
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Jordan D. Howlette
Justly Prudent, 420 Florida Ave. NE, Suite 27,
Washington, DC 20002 | (202) 921-6005

DEFENDANTS

Prince George's County, MD

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☒ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

INTELLECTUAL PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
The Civil Rights Act of 1964, 42 U.S.C. § 2000e-3(a)

Brief description of cause:
Retaliation in the form of withholding annual accrued leave payout following separation of employment

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ 150,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE Theodore D. Chuang DOCKET NUMBER 8:26-cv-01507-TDC

DATE
Oct 7, 2026

SIGNATURE OF ATTORNEY OF RECORD
Jordan D. Howlette

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below**; NOTE: federal question actions take precedence over diversity cases.**)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. Origin. Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

EXHIBIT 1

April 21, 2026

Department of Permitting, Inspections, and Enforcement (DPIE)
Prince George's County
9400 Peppercorn Place, Suite 500
Largo, MD 20774

Dear Bosa,

Please accept this letter as formal notice of my resignation from my position as Paralegal Supervisor and working title Office Manager with Quality Assurance and Quality Control Department with the Department of Permitting, Inspections, and Enforcement, effective May 11, 2026. This letter serves as my three-week notice.

I am grateful for the opportunity to have worked here and for the experience and knowledge I have gained during my time with the County. I have gained an invaluable amount of knowledge.

As I am currently on FMLA leave, I am requesting to utilize my accrued sick leave through my effective date.

Additionally, please advise on the process for returning County-issued equipment and coordinating the clearance of my workspace.

Thank you again for the opportunity. I appreciate your guidance and support.

Sincerely,

Sofia Franco

EXHIBIT 2

Office of Human Resources Management
Employee Separation Form

Identifying Information:

Name: Sofia Franco SSN: 39194
Department: DPIE - Permit Service Office Separation Date: 5/11/26
Reason for Leaving: Resignation/New Job

Do not use "NO REASON GIVEN"

W-2 Mailing Address if different from address on file with the Office of Human Resources Management:

Return of County Property/Other:

☑ Building Access Pass	☐ Mainframe Security	☐ Travel Advance
☑ Cellular/Mobil Phone	☐ Memberships/Subscriptions	☐ Travel Expense Report
☐ County Equipment	☐ Pager	☐ Vehicle & Log
☑ County ID	☐ PDA's	☐ Voice Mail and Email Passwords
☐ Credit Cards/Purchase Cards	☐ Parking Permit	☐ Uniform / Clothing Returned
☐ Keys (office, car, etc) "labeled"	☐ Performance Appraisals	☐ Work-in-progress Updates
☐ LAN Security	☐ Petty Cash	☐ Other_____
☑ Laptop/Office Equipment	☐ Remote Access	

Charger

Disbursement of Final Pay/Leave Check:

☐ Release to Department
☑ Direct Deposit
☐ Mail to: _____

Financial Disclosure Statement:

I understand that I have sixty (60) days to complete and file a Financial Disclosure Statement with the County. XSF
Initials

Leave Disposition:

☑ Lump sum cash payment of **new** annual leave up to 360 hours, or
☐ Lump sum cash payment of **old** annual leave, or
☐ Lump sum cash payment of a **combination of old and new** annual leave - up to 360 hours.

☐ Lump sum cash payment of **old** sick leave paid per applicable salary schedule
☐ Convert sick leave for retirement credit

☐ Retain_____ hours of sick leave balance in leave record
☐ Retain_____ hours of annual leave balance in leave record

☐ Ineligible for Payment. Reason: _____

Leave Donation: ☐ Employee (name) Suzette Hall (agency) DPIE (# hours) 74 (Sick Leave)
☐ Military Leave Bank (# hours)_____ Specify - Annual / Personal / Compensatory / Discretionary
Attach appropriate form(s).

I understand that this authorization becomes irrevocable ten (10) working days after my separation date.

X _____ 04/30/26
Employee Signature / Date

_____ 4/30/26
Departmental HR Liaison / Date Thelia Jones

_____
Departmental IT Coordinator / Date

_____
OHRM Representative / Date

all Items returned. 4/30/26

Distribution List: Finance/Payroll – White OHRM/Performance Management – Yellow Employee – Pink

PGC Form 4281 (12/04)

EXHIBIT 3

From: "Jones, Thelia D." <TDJones@co.pg.md.us>
Date: June 3, 2026 at 12:00:56 PM EDT
To: Sofia Orosco <orosco.sofia12@gmail.com>
Subject: RE: Three-Week Resignation Notice

Thank you for your response.

To clarify the request to update your reason for departure is an OHRM request not a DPIE request. I will contact OHRM to let them know to proceed with the resignation letter as is.

If you have any further questions or concerns, please contact the Office of Human Resources Management regarding your separation.

Thank you

Thelia D. Jones | Human Resources Supervisor
Administrative Services Division
Prince George's County Department of Permitting, Inspections and Enforcement

9400 Peppercorn Place | Suite 500 | Largo, MD 20774
Office 301-636-2044 | Cell Phone 240-832-9636, tdjones@co.pg.md.us

From: Sofia Orosco <orosco.sofia12@gmail.com>
Sent: Wednesday, June 3, 2026 11:52 AM
To: Jones, Thelia D. <TDJones@co.pg.md.us>
Subject: Re: Three-Week Resignation Notice

CAUTION: This email originated from an external email domain which carries the additional risk that it may be a phishing email and/or contain malware.

Good afternoon Thelia,

After consulting with my attorney, I respectfully decline the Department's request that I submit a revised resignation letter containing additional language regarding the reasons for my separation. My original resignation letter, dated April 21, 2026, was submitted in writing within the required notice period and complies with all applicable requirements under the Prince George's County Personnel Law, including Section 16-186. That letter accurately reflects my resignation and the request to utilize my accrued sick leave through my effective date of May 11, 2026, and I do not intend to supplement or revise it.

I understand that the Department has indicated it will not process the payout of my accrued paid time off absent the requested revision. I respectfully disagree that any such revision is a lawful prerequisite to the release of compensation I have already earned, and I ask that the Department promptly process the payout of my accrued leave in accordance with County policy.

Please direct any further communications regarding this matter, or any other matter related to my employment or separation, to my attorney, Jordan D. Howlette of Justly Prudent, who can be reached at jordan@justlyprudent.com or (202) 921-6005. At the advice of my attorney, I would ask that you refrain from contacting me directly regarding this issue going forward.

Thank you for your attention to this matter.

Sincerely,

Sofia Franco

On Wed, Jun 3, 2026 at 10:23 AM Jones, Thelia D. <TDJones@co.pg.md.us> wrote:

Good morning Sofia,

Just following up on the conversation last week regarding your resignation. Please send a new resignation letter if you resigned due to a job opportunity. If you did not resign due to a job opportunity, your letter can remain the same. Please let me know by Thursday June 4 @ 3pm.

OHRM would like to officially close your account and cant do so until we verify this information with you.

Thank you

Thelia D. Jones| Human Resources Supervisor

Administrative Services Division

Prince George's County Department of Permitting, Inspections and Enforcement

9400 Peppercorn Place | Suite 500 | Largo, MD 20774

Office 301-636-2044| Cell Phone 240-832-9636, tdjones@co.pg.md.us

<image001.png>

From: Sofia Orosco <orosco.sofia12@gmail.com>
Sent: Tuesday, April 21, 2026 2:22 PM
To: Ugo, Bosa <bugo@co.pg.md.us>
Cc: Jones, Thelia D. <TDJones@co.pg.md.us>
Subject: Three-Week Resignation Notice

CAUTION: This email originated from an external email domain which carries the additional risk that it may be a phishing email and/or contain malware.

Good afternoon,

Please see the attached notice. If you have any questions or concerns, please feel free to contact me at 240-608-8504.

Sincerely,

Sofia

This E-mail and any of its attachments may contain Prince George's County Government or Prince George's County 7th Judicial Circuit Court proprietary information or Protected Health Information, which is privileged and confidential. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited by federal law and may expose you to civil and/or criminal penalties. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.

This E-mail and any of its attachments may contain Prince George's County Government or Prince George's County 7th Judicial Circuit Court proprietary information or Protected Health Information, which is privileged and confidential. This E-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this E-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this E-mail is strictly prohibited by federal law and may expose you to civil and/or criminal penalties. If you have received this E-mail in error, please notify the sender immediately and permanently delete the original and any copy of this E-mail and any printout.

EXHIBIT 4

JUSTLY PRUDENT
DEFENDING CIVIL RIGHTS WITH PASSION AND PURPOSE

420 Florida Ave. NE, Suite 27 ▪ Washington, DC 20002
Office: (202) 921-6080 | Fax: (202) 921-7102
info@justlyprudent.com | www.justlyprudent.com

CONFIDENTIAL//FOR SETTLEMENT PURPOSES ONLY

June 16, 2026

Sent by Electronic Means & Certified Mail,
Return Receipt Requested

Stephen Williams, Esq.
Deputy County Attorney
Prince George's County Office of Law
1301 McCormick Drive, Suite 4100
Largo, Maryland 20774
sjwilliams@co.pg.md.us

RE: Notice of Representation & Demand for Payment of Accrued Annual Leave
Client: Sofia Franco
Related Case: Franco v. PGC, et al. (Case No. 8:26-cv-01507-TDC)

Dear Mr. Williams:

Please be advised that my firm represents Ms. Sofia Franco in connection with her claims against Prince George's County, Maryland (the "County"), including the County's failure to pay Ms. Franco her accrued annual leave following her separation from the Department of Permitting, Inspections and Enforcement ("DPIE"). All future correspondence regarding this matter should be directed to my office by way of email at jordan@justlyprudent.com or by mail addressed to Justly Prudent, ATTN: Attorney Jordan Howlette, 1140 3rd St. NE, Suite 2180, Washington, DC 20002.

For the reasons set forth below, Ms. Franco **respectfully requests that the County remit the lump sum payment for her accrued annual leave, as elected on her Employee Separation Form (attached as Exhibit 1), within 15 days of the date of this letter**.

I. Background

Ms. Franco is a former employee of DPIE. In connection with her separation from County employment, Ms. Franco completed and signed the County's Employee Separation Form (PGC Form 4281), on which she elected a lump sum cash payment of her accrued new annual leave, up to 360 hours. The departmental Human Resources Liaison signed the form on April 30, 2026, and certified that all County property had been returned. By the form's own terms, Ms. Franco's leave disposition election became irrevocable 10 working days after her separation date. To date, however, the County has not paid Ms. Franco for her accrued annual leave, and the County has offered no explanation for the delay.

II. Discussion

Section 16-220(i) of the Prince George's County Code provides that a separating employee shall receive payment for accumulated annual leave in accordance with Section 16-221.02 of the Code. Accrued leave payable under an employer's written policy constitutes a "wage" under the Maryland Wage Payment and Collection Law, Md. Code Ann., Lab. & Empl. §§ 3-501 *et seq*., and Section 3-505(a) of that law requires an employer to pay all wages due upon termination of employment on or before the day the employee would have been paid had the employment not ended—that is, by the next regular payday. Where wages are withheld absent a bona fide dispute, Section 3-507.2 authorizes an award of up to three times the unpaid wage, together with reasonable attorney fees and costs.

Ms. Franco earned her annual leave through her service with DPIE, elected the lump sum payout authorized by Section 16-221.02, and satisfied every condition of her separation, as the County's own form confirms. Her entitlement to payment is therefore fixed, and no provision of the County Code or the applicable Salary Plan authorizes the County to withhold or delay it. The next regular payday following Ms. Franco's separation has long since passed, and each additional pay period that elapses without payment compounds the County's exposure.

By reason of the foregoing, and to alleviate the need to seek judicial intervention, Ms. Franco requests that the County remit the full lump sum payment of her accrued annual leave within 15 days of the date of this letter, together with written confirmation of the gross amount paid, the number of hours paid, and any deductions taken.

Document Preservation Notice

It is my sincere hope that this matter can be resolved timely without the need for further action or litigation. However, this letter shall further serve as notice to the County to preserve any information having to do with this matter, including any emails, text messages, or other forms of communication between the County and any of its respective employees or contractors, concerning this matter.

Thank you in advance for your prompt attention to this matter. I look forward to receiving your response.

Sincerely,

Jordan D. Howlette

JORDAN D. HOWLETTE
Managing Attorney
Justly Prudent
(202) 921-6005
jordan@justlyprudent.com

EXHIBIT 1

Office of Human Resources Management
Employee Separation Form

Identifying Information:

Name: Sofia Franco SSN: 39194
Department: DPIE - Permit Service Office Separation Date: 3/11/26
Reason for Leaving: Resignation/New Job

Do not use "NO REASON GIVEN"

W-2 Mailing Address if different from address on file with the Office of Human Resources Management:

Return of County Property/Other:

☑ Building Access Pass	☐ Mainframe Security	☐ Travel Advance
☑ Cellular/Mobil Phone	☐ Memberships/Subscriptions	☐ Travel Expense Report
☐ County Equipment	☐ Pager	☐ Vehicle & Log
☑ County ID	☐ PDA's	☐ Voice Mail and Email Passwords
☐ Credit Cards/Purchase Cards	☐ Parking Permit	☐ Uniform / Clothing Returned
☐ Keys (office, car, etc) "labeled"	☐ Performance Appraisals	☐ Work-in-progress Updates
☐ LAN Security	☐ Petty Cash	☐ Other_____
☑ Laptop/Office Equipment	☐ Remote Access	

Disbursement of Final Pay/Leave Check:

☐ Release to Department
☑ Direct Deposit
☐ Mail to: _____

Financial Disclosure Statement:

I understand that I have sixty (60) days to complete and file a Financial Disclosure Statement with the County. XSF
Initials

Leave Disposition:

☑ Lump sum cash payment of **new** annual leave up to 360 hours, or
☐ Lump sum cash payment of **old** annual leave, or
☐ Lump sum cash payment of a **combination of old and new** annual leave - up to 360 hours.

☐ Lump sum cash payment of **old** sick leave paid per applicable salary schedule
☐ Convert sick leave for retirement credit

☐ Retain_____ hours of sick leave balance in leave record
☐ Retain_____ hours of annual leave balance in leave record

☐ Ineligible for Payment. Reason: _____

Leave Donation: ☐ Employee (name) Suzette Hall (agency) DPIE (# hours) 74 (Sick Leave)
☐ Military Leave Bank (# hours)_____ Specify - Annual / Personal / Compensatory / Discretionary
Attach appropriate form(s).

I understand that this authorization becomes irrevocable ten (10) working days after my separation date.

X _____ 04/30/26
Employee Signature / Date

_____ 4/30/26
Departmental HR Liaison / Date Thelia Jones

_____
Departmental IT Coordinator / Date

_____
OHRM Representative / Date

all Items returned. 4/30/26

Distribution List: Finance/Payroll – White OHRM/Performance Management – Yellow Employee – Pink

PGC Form 4281 (12/04)

EXHIBIT 5

Employee and Labor Relations, EEO

Date: April 8, 2026

Ms. Sofia Franco, Paralegal Supervisor
Department of Permitting, Inspections, and Enforcement
Prince George's County Government
9400 Peppercorn Place
Largo, MD 20774
Via electronic Mail: Sfranco@co.pg.md.us

OHRM Inquiry Number: 00022
Subject: EEO Claim Dismissed

Dear Ms Franco:

The Office of Human Resources Management (OHRM) reviewed and considered your submission of documents and claim dated 10/20/2025. This letter constitutes OHRM's administrative dismissal without prejudice regarding the above referenced matter. The basis is indicated by a check mark below, and a further explanation is provided on the next page.

☒ The Complaintant failed to state a claim for which relief can be granted.

☐ The Complainant submitted an incomplete Complaint Form for EEO.

☐ The complaint submitted contained matters defined and provided for under applicable collective bargaining agreement.

☐ OHRM cannot contact the Complainant using the contact information of record and the Complainant has not contacted OHRM as follows:

> ☐ OHRM was unsuccesful in its attempts on Choose Date and Choose Date to contact the Complainant by telephone, e-mail, or mail addressed to the Complainants address of record.
>
> ☐ The Complainant failed to contact OHRM within thirty (30) days of OHRM's telephone contact, e-mail, or mail.

☐ The Complainant submitted a written request to withdraw the complaint.

☐ The Complaint was not filed with OHRM-EEO within five (5) working days of the date Responsible Official was to have responded or five (5) working days of the receipt of response.

Further Explaination:

The EEO investigator's finding are as follows:

1. Age
The investigation does not sustain the allegation the Respondent engaged in age discrimination.
Finding: Unsubstantiated Allegation of Age Discrimination

2. Race
The investigation does not sustain the allegation that the Respondent discriminated against Ms. Franco based on race.
Finding: Unsubstantiated Allegation of Racial Discrimination

3. Retaliation
The investigation does not sustain the allegation that the Respondent participated in or created a hostile work environment.
Finding: Unsubstantiated Allegation of Retaliation

4. Hostile Work Environment
The investigation does not sustain the allegation the Respondent participated in or created a hostile work environment.
Finding: Unsubstantiated Allegation of Hostile Work Environment

You failed to state a claim for which relief could be granted. Under the EEOC, harassment must be based on race, sex, sexual orientation, color, religion, creed, country of national origin, political opinion, marital status, age, physical or mental handicap, or physical appearance. Further, at the conclusion of the review of the complaint, your Chief of Human Resources Officer met with you to advise of the steps taken to review the matter as well as the conclusion of the matter. As a result your claim is **dismissed.**

This decision is final and not subject to further review. However, if you have questions about the dismissal of your grievance, please contact the EEO Administrator at Employeerelations@co.pg.md.us.

Employee Options:

In addition to filing a complaint in the manner prescribed above, alleged victims may instead file a complaint with: Office of Law, Prince George's County, State of Maryland Commission on Civil Rights, or the Equal Employment Opportunity Commission.

Regards,

EEO Administrator

cc: Deputy Director, OHRM, ELR

Office of Human Resources Management
1400 McCormick Drive
Largo, MD 20774
301-883-6330

D

Aisha N. Braveboy
County Executive

Prince George's County
Office of Human Resources Management

OHRM
Office of Human Resources Management

MEMORANDUM

DATE: April 9, 2026

TO: Dawit Abraham, Director
Department of Permitting, Inspections, and Enforcement (DPIE)

THRU: Gitana Stewart-Ponder, Deputy Director
Office of Human Resources Management

FROM: Stephanie D. Bridgeforth, Director
Office of Human Resources Management

RE: OHRM Response to Allegations of Discrimination based on Age, Race, Discrimination, and Creating a Hostile Work Environment

SUMMARY OF ALLEGATIONS

On December 12, 2025, a formal investigation was launched after OHRM's investigator met with Eric Ampedu, HR Director, Department of Permitting, Inspections, and Enforcement (DPIE) whereupon Mr. Ampedu deferred his original case with Ms. Sofia Franco to the Office of Human Resources Management (OHRM)for alleged discrimination by Michelle Lyons, Associate Director of Administrative Services at DPIE, referred to as "Respondent" (R). Sofia Franco further referred to as Complainant (C) alleged discrimination by Ms. Lyons based on age, race, retaliation, and creating a hostile work environment.

INVESTIGATION FINDINGS

Finding: *Unsubstantiated Allegation of Age Discrimination*

1. Age

The investigation **does not sustain** the allegation the Respondent engaged in age discrimination. (C) alleged that (R) said she was young and inexperienced. In her interview, (R) said she is new in the position and still has a lot to learn. The Complainant's performance had dropped through missed deadlines and poorly written documents, so indicated there were areas of growth and development in the role. B-6

Finding: *Unsubstantiated Allegation of Racial Discrimination*

2. Race

The investigation **does not sustain** the allegation that the Respondent discriminated against the Complainant based on race.

(a) Allegations were made by (C) that she was moved from an office to a cubicle as the only Latina. Ms. Thelia Jones, in her interview, stated that this was not done due to race, but an employee of higher rank was being moved to make room for employees required to return to work. Per the Front-Facing Plan, agencies were to use the Room and Space Allocation Based on Title. (C-1)
(b) Allegations were made by Complainant that Respondent made a comment about ICE. In and investigation regarding such comments, interviews conducted with Eric Ampedu and with Respondent, he found no basis for discrimination against the complainant, but rather a concern for her and distribution of knowledge. B-1, B-5
(c) In her interview with OHRM's investigator, the Complainant alleged race discrimination citing the Respondent stated, "you are the "b^%$#" getting all the Black people fired". In another investigation, Eric Ampedu questioned the Respondent and this comment was denied. The investigator also questioned the Respondent and was told the Complainant is a sensationalist and creates drama around everything. As a supervisor she addressed the Complainant not following the rules or looping her in on a reasonable suspicion marijuana use by the temporary employees. It is a case of what she said/she said and cannot be substantiated. A-1; B-1
(d) Allegations of preferential treatment to Semaja Reams were made by the Complainant in reference to clocking in from home privileges. The investigator has researched this and found that Mr. Reams must call in from home to initiate a clock in while teleworking. B-7 The Complainant was originally granted clocking in from her phone, before her promotion, when worked with Investigations Division. Concerns were raised by the Respondent regarding the "stealing of time" as the Complainant was clocking in from her phone or device at home and later showing up for work hours later. B-6 The Respondent sought to revoke privileges so the proper clock in procedure was being adhered to by the Complainant.

Finding: *Unsubstantiated Allegation of Retaliation*

3. Retaliation

The investigation **does not sustain** the allegation that the Respondent participated in or created a hostile work environment. The Respondent attempted through multiple counseling sessions to hold the Complainant accountable. After each verbal interaction involving either conduct or performance, the Complainant went to someone else to complain about her supervisor. B-1, B-3, B-5, B-6, B-9, B-10

Finding: *Unsubstantiated Allegation of Hostile Work Environment*

4. Hostile Work Environment

The investigation **does not sustain** the allegation the Respondent participated in or created a hostile work environment. While frequently cited as not being at work, or unavailable for questions, the Respondent's behavior was not severe and pervasive to create an intimidating, hostile, or abusive environment. The Respondent attempted through multiple counseling sessions to hold the Complainant accountable for both conduct and performance issues. After every verbal counseling session, the Complainant initiated a complaint against the Respondent.

5. Other Findings Non EEO-Related

While conducting the investigation, the investigator noted a pattern by the Complainant. Two things: When the Respondent found issue with conduct or performance, the Complainant immediately shared her concerns of unfavorable treatment by the Respondent with other employees and HR, and when not immediately resolved or answered to her liking, escalated the issue higher to provoke a reaction of immediacy.

a. Employee (C):

The Complainant has been verbally warned about multiple issues by her supervisor and shared with HR to include:

i. Time inputs,
ii. Leaving work without permission
iii. Coming in late and leaving early
iv. Poor work product, and
v. Not following protocols and instructions. B-1, B-5, B-9, B-10

Each of these issues was brought to Thelia Jones, Human Resources Liaison, to include:

i. Clocking in and out remotely, Michelle restricted her from her timecard in Kronos. The Respondent turned off the ability to clock in remotely from her phone, as the discussion was around the Complainant stealing time, by clocking in and taking her children to school, then going in to work. B-5
ii. Another incident occurred where the Complainant told Bill Edelen he was using the wrong form and to resubmit, the Respondent was pulled, and a meeting was had between the three. It escalated and was ended by the Complainant when she abruptly left work emotionally upset, without permission.
iii. Following this incident, the supervisor was concerned about her time and attendance as she called out a lot. Thelia noted she was AWOL, and as is standard for HR, shared Family Medical Leave paperwork, due to many

factors and wanted to ensure she could exercise her rights. The Complainant brought this up in her interview, alleging that she was being targeted.

iv. No complaints shared with Thelia were described in any way as being discriminatory, harassing, or creating a hostile work environment, by her supervisor.

v. Per Thelia, the Respondent has never written up the Complainant but used them as coaching moments.

b. Supervisor (R):

While witnesses do not believe (R) made or intended discriminatory remarks, they describe her as:

i. lacking a filter at times B-10
ii. showing favoritism to family friends under her employment B-9
iii. being dismissive
iv. lacking neutrality on boards by (R) B-10
v. often absent from work, and difficult to reach B-9

While the Respondent complained about both conduct and performance, no verbal or written warning letters were issued by the supervisor, nor has her performance appraisal formally given, rendering a Performance Improvement Plan (PIP) mute. Ms. Thelia Jones addressed this issue with (R) in previous conversations, as this is expected of her, as a supervisor

c. Leadership Concerns

The Respondent reports directly to Mr. Hinton and should have been held accountable for being unavailable to her employees at work and not having clear office hours.

Of great concern are comments about Mr. Hinton from witnesses throughout the investigation. Lamont Hinton is named by many as being untrustworthy, unprofessional and inappropriate, and alleged to be in a relationship with a subordinate. B-2, B-10

Witnesses have made allegations regarding Mr. Hinton's abusive language and tone, sexual harassment of female staff, as well as discriminatory remarks made to staff regarding origin. D-1

RECOMMENDATIONS

1. **Employee Training for Complainant:** Resolving conflicts internally is essential to problem-solving. These courses in NEGOV would provide strategies for resolution before they rise to a higher level. Additionally, they provide a foundation for success for any employee in Prince George's County Government. The Complainant should take the courses within 90 days from receipt of notification of outcomes.
    a. From Conflict to Clarity
    b. Effectively Resolve Conflicts Training

2. **Supervisory Training for Respondent:** As there is no previous discipline, the Respondent is required to take the following training courses by **no later than 90 days** from receipt of notification of outcomes.
    a. Post Disciplinary Training Plan – Bullying and Harassment
        i. A Guide to Healthy Communication
        ii. Appropriate Workplace Behavior: Respectful Communication Styles
        iii. Effective Feedback Strategies
        iv. Navigating Generational Diversity in the Workplace
        v. Receiving Feedback
        vi. Workplace Violence Prevention
    b. Discipline and Termination – Progressive Discipline
        i. Discussing Discipline
        ii. Documenting Discipline
        iii. Progressive Discipline
        iv. Sensitive Subjects
        v. Termination Tips
3. **Lamont Hinton Conduct Accountability**
    a. Respondent should have been held accountable by Deputy Director Hinton for not holding one-on-ones with Sofia, not being in the office, not completing performance appraisals, and not metering out discipline.
    b. Conduct a third-party investigation into Lamont Hinton's conduct and allegations of a relationship with Sherri Prince. Additionally, Ms. Prince has shared private information that only Mr. Hinton would have known, going beyond the scope of her position.
        i. Mr. Hinton's treatment of staff in meetings and use of inappropriate language.
        ii. Allegations of sexually harassing staff members.
        iii. Allegations of verbally harassing and discriminating against his own staff. D-1

Interview List

Name	Title	Date	Race	Age	Sex	Appendix Link
Sofia Franco	Paralegal Supervisor	10.20.25 12.11.25	Latina	33	F	A, A1
Eric Ampedu	Associate Director	2.18.26	Black	62	M	B-1
Gabriel Bejarano	Property Standards Inspector	2.9.2026	Latino	42	M	B-2
Toya Burnett	Executive Administrative Aide	2.26.26		51	F	B-3
Lamont Hinton	Deputy Director	2.19.26	Black	56	M	B-4
Thelia Jones	Human Resources Analyst 4G	2.28.26	Black	43		B-5
Michelle Lyons	Administrative Specialist	2.25.26	Black	73	F	B-6
Semaja Reams	Admin Aide 2A	12.17.25	Black	23	M	B-7
Jenchesky Santiago	Property Standards Inspector	12.17.25	Latino	35	M	B-8
Calisa Smith	Associate County Attorney	3.5.26	Black	44	F	B-9
Chrystal Tibbs	Administrative Specialist 2-G (AD)	12.18.25	Black	58	F	B-10

Folder link:

Aisha N. Braveboy
County Executive

Prince George's County
Office of Human Resources Management

OHRM
Office of Human Resources Management

Office of the Director, Employee & Labor Relations

Sofia Franco, DPIE Allegations of EEO: Age, Race, Retaliation, and Hostile Work Environment

R **Expedited Review (3 days)**
R d r

SECTION 1: Executive Summary

d rR R r r r d d d
Sofia Franco, Paralegal Supervisor, against her supervisor Michelle Lyons, Administrative Specialist, Department of Permitting, Inspections, and Enforcement (DPIE).

Description R r d M d dR d

urpose: d r r r r M d d
R d r r d d dr d

Background or Context: rd r r RM R r d d r
d

Recommendation r d d dR d RM r
D

Review Summary RD R r d dr d r
r

SECTION 2: Documents for Review

#	Document for Review	SharePoint Link *(required for revisions only)*	Action Required *(select all that apply)*
1	Transmittal Form	r D d d R d d	☒ R ☒ r
2	Findings and Recommendations	R r d D d	☒ R ☒ r
3	Folder Materials Link	r D	☒ R ☐ r
4	EEO Claim Dismissal	d r d	☒ R ☐ r

SECTION 3: Type of Approval Requested

Who needs to approve this package? (Consult your manager for guidance if needed)

☐ D M r ☐ Dr r ☒ RMD Dr r ☒ RMDr r

Please provide any additional comments below to explain your selection:

Click or tap here to enter text.

SECTION 4: Approval Signatures

Return to:	M d		
		Initials	Date
Prepared by:	M d	M	
Employee or Labor Relations	r d r D Dr r		

SECTION 5: OHRM Director Action

☐ r d ☐ D r ☐ M d ☐ D

Stephanie Bridgeforth, OHRM Director Date