

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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Suzanne D. Windsor
2501 17th Street, N.E.
Washington, DC 20018

Plaintiff,

v.

BOARD OF EDUCATION OF
PRINCE GEORGE'S COUNTY
14201 School Lane
Upper Marlboro, MD 20772
And

Janice Briscoe, in her individual capacity
and official capacity as Special Projects Officer,
Karyn Lynch, in her individual capacity and
official capacity as Chief of Student Services
Jacqueline Naves, in her individual capacity
and official capacity as Supervisor of Pupil
Services,
Douglas Anthony in his individual capacity
and official capacity as the Acting Director
of Human Resources,

Defendant (s)

Civil Action No. _____

Jury Trial Demand

14 CV 2287
TDC

COMPLAINT

NOW COMES Plaintiff, Suzanne D. Windsor ("Ms. Windsor" or "Plaintiff"), pro se, and files this Complaint against Defendants, Prince George's County Public School System ("the Board"), Ms. Janice Briscoe ("Ms. Briscoe"), Ms. Karyn Lynch ("Ms. Lynch"), Mr. Douglas Anthony ("Mr. Anthony" or "Chief Anthony"), and Ms. Jacqueline Naves ("Ms. Naves") before this Court and alleges upon information and belief as follows:

PRELIMINARY STATEMENT

1. This is a civil rights action in which the Plaintiff seeks damages for personal and pecuniary injuries sustained as a result of Defendant's wrongful conduct in violation of Title VI of the Civil Rights Act of 1964, 42 U.S. C. §2000d-7, et. seg. , as the U. S. Department of Education provided Maryland Public Schools, which includes Prince George's County Public Schools, with more than \$1 billion under the American Recovery and Reinvestment Act of 2009 and also federal stimulus funds (State Fiscal Stabilization Grants, ARRA) in addition to the Education Jobs Fund money from August 10, 2010 to September 30, 2012; in short, the Board received federal funds for the express purpose of creating and maintaining existing jobs and by discriminating/retaliating

against Ms. Windsor the Board also discriminated against those for whom the money was ultimately to be used, the students. Title VI requires the recipients of federal funds (the Board) to waive Eleventh Amendment sovereign immunity.

2. This is a civil rights action in which the Plaintiff seeks damages for personal and pecuniary injuries sustained as a result of Defendant's wrongful conduct in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e., *et seq.*, for employment discrimination on the basis of race, color, and retaliation.
3. This is a civil rights action in which the Plaintiff seeks damages for personal and pecuniary injuries sustained as a result of Defendants' wrongful conduct in violation of the Civil Rights Acts of 1866 and 1871, 42 U.S. C. §§1981 and 1983 to redress race and color discrimination and retaliation for opposing discriminatory practices and to redress the deprivation of rights, privileges, and immunities secured to the plaintiff by the U.S. constitution and the laws of the United States.
4. Plaintiff seeks back pay, front pay, compensatory and punitive damages and an award of costs and attorney's fees pursuant to Title VI, Title VII, the Civil Rights Acts of 1866 and 1871, 42 U.S.C. §§ 1981 and 1983, and any other enabling statute available for that purpose, and all other relief as the Court deems equitable and just for acts.

JURISDICTION

5. Jurisdiction is conferred upon this Court by 42 U.S.C. §2000e-5 (f) and 28 U.S. C. § 1331, as this action seeks to redress the civil rights guaranteed to Plaintiff under federal law.

VENUE

6. The United States District Court for the District of Maryland is the proper venue, pursuant to 28 U.S. C. § 1391 (b) and (c) and pursuant to 42 U.S. C. § 2000e-5 (f)(3) as the events and occurrences giving rise to this action occurred within this judicial district.

PARTIES

7. Plaintiff, Suzanne D. Windsor, is a current employee of the Prince George's County Board of Education.
8. Defendant, Prince George's County Public Schools, is located in Prince George's County, Maryland with approximately 23,785 employees.

9. Defendant, Janice Briscoe is sued in her individual and official capacity as former Special Projects Officer with Prince George's County Public Schools.
10. Defendant, Karyn Lynch is sued in her individual and official capacity as the former Chief of Student Services with Prince George's County Public Schools.
11. Defendant, Douglas Anthony is sued in his individual and official capacity as the former Acting Chief of Human Resources with Prince George's County Public Schools.
12. Defendant, Jacqueline Naves is sued in her individual and official capacity as the Supervisor of Pupil Services with Prince George's County Public Schools.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

13. Plaintiff, Suzanne D. Windsor, filed timely complaint with the Equal Employment Opportunity Commission, which came to be Charge No.531-2012-01486C, in May of 2012 for events beginning in August of 2011 that pertain to the discrimination allegations based upon race, color, and retaliation.
14. Plaintiff went to, called, and emailed the EEOC numerous times seeking to follow up on the Charge and to amend the complaint as retaliation continued to take place after plaintiff filed Charge No. 531-2012-01486C.
15. Upon seeing that the EEOC was unresponsive, Ms. Windsor then faxed in amendments she wished to make on or about February 17, 2013.
16. EEOC continued to be unresponsive to repeated requests to amend the complaint so Ms. Windsor went to the EEOC's Baltimore field office and submitted supplemental complaint documents to be included in the complaint and had the EEOC agent stamp said document to evidence receipt on or about June 21, 2013.
17. On or about February 12, 2014, plaintiff received a letter from EEOC instructing Ms. Windsor not to contact the EEOC for a minimum of 60 days.
18. On April 22, 2014, EEOC issued a Notice of Right to Sue letter to Ms. Windsor without responding to communication requests made by Ms. Windsor.

STATEMENT OF CLAIM

Introduction

19. Ms. Windsor is a 42 year old light colored, (Native American/African-American) female who, at all times relevant herein, is in the employ of the Board.

20. Ms. Windsor was hired as a classroom teacher on or about August 19, 1993 for employment with the Board of Education, and her current title is Pupil Personnel Worker, which is a member of what is referred to as the Unit 1 or the "teacher division" represented by the bargaining unit PGCEA (Prince George's County Educators Association).

1993-2014

21. When Ms. Windsor began her career with the Board, she was placed at Crossland High School as an English teacher in one of the 205 public schools in the County that serves approximately 125,136 students.

22. During her tenure of time with the Board, Ms. Windsor continuously received satisfactory reviews and various commendations and awards for her job performance.

23. Ms. Windsor excels at her job and steadily interviewed and was selected for positions of increased responsibility from English teacher to Guidance Counselor, from Guidance Counselor to the Department Chairperson of Guidance, and from the Department Chairperson of Guidance to Pupil Personnel Worker/Superintendent's Designee until she made a report of harassment and retaliation.

24. Although Ms. Windsor enjoyed and excelled at her job, she noticed great disparity in the manner in which she was treated as a light complexioned, Native & African-American individual from that of other individuals by her supervisors from the very on-set of and throughout her tenure of time in the employ of the Board of Education in Prince George's County Maryland.

August 1993- June 1994

25. As a first year teacher, Ms. Windsor was called derogatory racial terms, subjected to harsh treatment, and endured various hardships that her African-American counterparts did not have to face as she was also the subject of a staff and supervisory bet as to how much she could endure/how long it would take to make her quit since Ms. Windsor was given 5 classes of 9th grade students, no classroom of her own, and no assistance with disruptive students.

August 1994- June 1995

26. During her second year, Ms. Windsor's hair was set on fire by a male African-American student and she was told by the administration of the school that if she reported it to the police, she would not make tenure and Ms. Windsor also endured having the Principal change a mid-year evaluation after she signed it and left the office. Ms. Windsor sought the assistance of PGCEA after the administration remarked that, "at least he did not burn it all off," but was told that nothing could be done to assist her as the Board could fire her for any cause as she was not

tenured. So, Ms. Windsor quietly endured the treatment and worked diligently to try to earn tenure and the respect of her supervisors.

27. Ms. Windsor was also assaulted by a female African-American coworker as Ms. Tara Sims intentionally slammed the door to Ms. Windsor's classroom closed on Ms. Windsor's hand. Ms. Windsor had to go to her health care provider and received x-rays, treatment, and pain medication. The administration dismissed this as an accident and Ms. Sims did not receive any reprimand for this assault even after Ms. Windsor explained that this co-worker stated that she did not like light-skin females and that she perceived Ms. Windsor as a threat to her interest in a male co-worker.

1995-2005

28. After making tenure, having been nominated for the prestigious Maryland State Teacher of the Year award by her students for her work, and being promoted to the Chairperson of Guidance, Ms. Windsor was exhausted by the constant disparate treatment, acts of physical aggression, and being called or referred to by derogatory terms (i.e. half-breed, redbone, yellow girl, white girl), even as an exemplary veteran teacher by persons and an Assistant Principal at Crossland High School, so she reported the matter to the Principal, Mr. Charles Thomas.

August 2005- June 2006

24. Mr. Thomas removed Ms. Windsor from the position of Chairperson of the Guidance Department. Ms. Windsor asked in what way was her performance deficient for her to be removed and the principal replied that, "it is in no way deficient" but that he thought this decision, "is in the best interest of the school" despite the recognition Ms. Windsor had received from both the school and the Supervisor of Guidance, Ms. Andrea Carter-Lawson, for her exemplary work as the department chairperson.
25. Ms. Windsor reported this act of discrimination to the Principal's supervisor, the Associate Superintendent for Region 1, Ms. Janice Briscoe.
26. Ms. Briscoe did not respond to Ms. Windsor's requests for assistance; so, Ms. Windsor notified the Superintendent, Dr. John Deasy, who instructed Ms. Briscoe to address Ms. Windsor's concerns.
27. Ms. Briscoe then sent a representative from her Region's Associate Superintendent Office to investigate and Ms. Windsor was promised a transfer to another school.
28. After some time had passed and Ms. Windsor did not hear back from the Region office with further details about her transfer and assignment for the upcoming year, she again contacted the office of Ms. Briscoe and was then told that the transfer would not take place

and that she would have to remain in her current placement at Crossland High School with the demotion back to Guidance Counselor.

29. Ms. Windsor again contacted the Superintendent and informed him of Ms. Briscoe's reluctance to assist her. Ms. Windsor then requested a transfer to a high school that was also out of the boundary of Ms. Briscoe because of Ms. Briscoe's hostile demeanor and visible annoyance at having to assist her by order of Dr. Deasy.
30. Ms. Windsor being fully certified and qualified then also interviewed for a position as an Assistant Principal and she answered all of the questions well; however, at the conclusion of the interview, the interviewer informed Ms. Windsor that he knew and was fond of her principal, Mr. Thomas. Ms. Windsor's name was, subsequently, not but on the list of persons eligible to be selected for Assistant Principal positions.
31. Dr. Deasy and the Supervisor of Guidance, Ms. Carter-Lawson, then assisted in Ms. Windsor's transfer to Charles H. Flowers High School (Flowers) where Ms. Windsor was informed that she would be working with a guidance team that was in corrective action but that she would not be placed in that status and that she would be able to retain her position as a Department Chairperson of Guidance.
32. Ms. Briscoe was removed from her position as an Associate Superintendent by Superintendent Deasy for various factors and events that occurred at Crossland High School, which included Ms. Windsor's ordeal, and other schools within her Region.

August 2006- November 2007

33. While at Flowers High School, the Principal, Ms. Helena Nobles Jones, instructed Ms. Windsor to make certain that the counselors did not to place the students that failed 9th grade English the previous year back into the 9th grade English class this school year and not to place them in the 10th grade English class as this may adversely affect the test scores/her school's ranking. When Ms. Windsor voiced her concern for the children, the Assistant Principal over the Guidance department supported the decision of the Principal and gave Ms. Windsor a copy of an old Administrative Procedure from the 1980's that stated that a principal had the right to deny a student enrollment in a course.
34. Ms. Windsor then notified the Supervisor of Guidance, Ms. Carter-Lawson, of the Principal's directives as she did not want African-American youths to not receive equitable access to education and be denied placement in an English class for that academic year which could, ultimately, adversely affect their matriculation and to see if this Administrative Procedure was still in effect.
35. Ms. Carter-Lawson notified the Principal's Supervisor, Mr. William Barnes of the High School Consortium, about this situation and Mr. Barnes addressed this concern with the Principal as

this would be a serious issue for both the students and parents as well as being considered a serious violation if discovered by the State testing officials.

36. The Principal, angered that this request was reported to Mr. Barnes and that he would not allow her to do this, lined up all of the counselors in a row and went down the line and, in a loud voice, harshly interrogated each person to ascertain if they were the one that went to her boss on her; thus, this aggressive, intimidating behavior prompted Ms. Windsor to seek placement elsewhere.

November 2007- June 2009

37. Ms. Windsor then interviewed and was selected for the position of Pupil Personnel Worker and she was placed at Forestville Military Academy in November.
38. Ms. Windsor again excelled in her work performance as a Pupil Personnel Worker at Forestville Military Academy as she was an integral component of the team that successfully got the school off of the dreaded "State take-over list" for its previous years of failing performance prior to her arrival.
39. While working in her capacity as a Pupil Personnel Worker, Ms. Windsor was tasked to investigate the disciplinary requests for long-term suspensions and expulsion requests.
40. In investigating one such case at Forestville Military Academy, Ms. Windsor was informed by a secretary that an Assistant-Principal, Mr. Douglass Jones, assaulted a small, homosexual male student (R.B.) because of his dislike of the student's effeminate behavior as he left Mr. Jones' office and that the student was placed on an expulsion request by the Principal, Mr. James Smallwood, to try to coerce the parent into not filing charges against Mr. Jones or the school system.
41. Mr. Smallwood, Principal of Forestville Military Academy and also the President of the Association of Supervisory & Administrative School Personnel (the Supervisory/Administrative Union), instructed the school's Security team to hide the surveillance footage of the incident from Ms. Windsor so Ms. Windsor was then forced to contact Mr. Smallwood's supervisor, at the Office of the High School Consortium, Mr. William Barnes.
42. Ms. Windsor along with the team of persons assigned by Mr. William Barnes, Ms. Lois Cottom and Ms. Rosaline James, investigated the matter and worked diligently to ensure that this student was treated equitably and readmitted back into school.

43. Mr. Jones was also involved in an altercation with a female secretary, Ms. Dawn Pratt, to which Ms. Windsor was a witness and was also called upon to report as a witness in this secretary's sexual harassment case and to assist her in writing up the incident.
44. Mr. Jones made and posted a list of teachers that he disliked as they dared to challenge his authority or question his actions. This was referred to by staff members as Mr. Jones' "hit list." Ms. Windsor's name was on the list in the biggest, boldest red print with check marks behind her name and a date.
45. On the date indicated on Mr. Jones' "hit list," Ms. Windsor's immediate supervisor, Ms. Gabriel Fair made an unannounced visit to Ms. Windsor to observe her performance.
46. Upon arrival on the day circled on Mr. Jones' "hit list," Ms. Fair was extremely critical of every idea Ms. Windsor presented until Ms. Windsor asked Ms. Fair what suggestions she had for Ms. Windsor; to which, Ms. Fair was caught off guard and remained silent. Ms. Windsor then informed Ms. Fair that she had seen the list Mr. Jones had posted with this day's date circled, to which Ms. Fair coincidentally showed up to critique Ms. Windsor's performance. Ms. Fair then reviewed all of Ms. Windsor's logs and folders and upon seeing every item in order, Ms. Fair left Ms. Windsor's office.
47. Ms. Windsor took a photograph of this "hit list" posted in Mr. Jones' office located on the side of his file cabinet and included this in her report to Mr. Barnes, a Supervisor from the High School Consortium. Mr. Jones was barred from the building/unable to return for the remainder of the school year.
48. Both Mr. Jones and Mr. Smallwood were removed from Forestville Military Academy and placed elsewhere in the County. Mr. Smallwood was demoted from Principal to Assistant Principal and moved to Largo High School but was not removed from his position as the President of his unit's union to which the Supervisors, including Ms. Windsor's, and other Administrators belonged.
49. At the onset of the 2008-2009 school year, Ms. Windsor was attending the PGCPSS sponsored in-service activity for Pupil Personnel Workers at First Baptist Church of Glenarden when her direct Supervisor, Ms. Gabrielle Fair, stated to Ms. Windsor that, "I am going to push you out of the County."

50. Ms. Windsor reported Ms. Fair's threat, which had to stem from protected acts of defending a student being ill-treated due to his sexual preference, assisting a secretary that was assaulted/harassed, and resulted in the reassignment of her bargaining unit president and another colleague to other assignments as Ms. Windsor had no work performance deficiencies or unsatisfactory evaluations, to Ms. Elizabeth Sessoms (Faison). Ms. Sessoms was Ms. Fair's direct supervisor as Ms. Sessoms served as the Co-coordinating Supervisor for the Supervisors of Pupil Services.
51. Ms. Sessoms met with Ms. Windsor to discuss her concerns over the threat and treatment that she was receiving from Ms. Fair but no corrective action was taken against Ms. Fair.
52. Due to a budgetary deficit in the County, a reduction in force occurred and various persons in Ms. Windsor's department were laid off and those that remained were to be assigned based upon seniority in accordance with the Negotiated Agreement.
53. A Caucasian Pupil Personnel Worker with more experience "bumped" Ms. Windsor from her assignment at Forestville Military Academy; however, a Caucasian Pupil Personnel Worker with less seniority was not moved to another placement. When Ms. Windsor asked why this was not the case for that individual, Ms. Sessoms stated that this was because the principal requested that she stay. So, the new principal at Forestville Military Academy, Mr. Nathaniel Laney, then submitted a written request that Ms. Windsor remain but this request was not similarly honored.
54. Forestville Military Academy was also made a part of a cluster of high schools to receive a second Pupil Personnel Worker tasked to specifically work with the 9th grade. Ms. Windsor then asked to be placed in this position but this position also went to a co-worker with less seniority in the County.
55. Ms. Windsor was not given any choice in her assignment as others were allowed to pick based upon their seniority nor was Ms. Windsor allowed to remain at her Forestville Military Academy assignment as others were able to receive placements/remain at placements based upon Principal/Supervisor's requests. (A request by Ms. Windsor was not honored upon the retirement of a Pupil Personnel Worker from the Homeless Office as this placement was given to a Pupil Personnel Worker with less seniority in the County because the Supervisor requested her.)
56. When Ms. Windsor asked Ms. Sessoms why the request of a Supervisor/Principal was granted for 2 other employees but not for her, no legitimate explanation was given.

57. Instead, for the 2009-2010 school year, Ms. Windsor was denied her contractual rights based upon seniority and was placed at schools that no other Pupil Personnel Worker wanted to work at because they had "difficult" principals (Annapolis Road Academy with Ms. Katrina Miller and Thomas Johnson Middle School with Dr. C. Michael Robinson).
58. Due to the duty assignment change to the northern part of the County, Ms. Windsor then had a new direct supervisor, Dr. Anderson, and he tried to scold Ms. Windsor for encountering resistance and difficulty with these two principals until Ms. Windsor informed Dr. Anderson that she was aware of the numerous previous Pupil Personnel Workers that requested to be moved from both of these Principals for the mistreatment that Ms. Windsor was now forced to endure.
59. Ms. Windsor again asked if she could similarly move to a different placement, like those Pupil Personnel Workers that had seniority over her, to schools where she had seniority over individuals. The supervisory team declined Ms. Windsor's request.
60. While completing a mandatory data collection report, the Principal of Thomas Johnson Middle School became furious that Ms. Windsor accurately reported the number of students in his in-school suspension totals and that these students were not receiving educational services while in what he called an "academic resource/intervention room." Upon the request of the Principal, Ms. Windsor was moved to Parkdale High School to partner with another Pupil Personnel Worker, Dr. Karen Thoben; though, as previously stated, a Principal's request to keep Ms. Windsor was not honored.
61. Dr. Anderson, a Caucasian male, also informed Ms. Windsor that she could not conduct home visits unless she had a person to go with her. Ms. Windsor then asked Dr. Anderson why she had different rules to follow from the other Caucasian Pupil Personnel Workers in his group as they had informed Ms. Windsor that they conducted their visits without accompaniment and one Caucasian female even made a video to that effect which was shown at training that Dr. Anderson was a part of for all of the Pupil Personnel Workers. Dr. Anderson had no reply.
62. Thus, these and various other events demonstrated to Ms. Windsor that the African-American supervisors looked out for the African-American Pupil Personnel Workers and the Caucasian supervisor looked out for the Caucasian Pupil Personnel Workers but as Ms. Windsor did not neatly fit into either group, she would be treated less than both.
63. When Ms. Windsor submitted her monthly report, she indicated zero (0) home visits and Ms. Sessoms questioned why Ms. Windsor had not completed any visits. Ms. Windsor then informed Ms. Sessoms of Dr. Anderson's directive and Ms. Sessoms stated at the next County-wide training for Pupil Personnel Workers that all Pupil Personnel Workers could conduct visits unaccompanied.

64. Dr. Anderson meticulously observed, monitored, and evaluated Ms. Windsor; nevertheless, he rated her performance positively upon realization of the fine quality of work that Ms. Windsor demonstrated.
65. Ms. Windsor believes that she was constantly being punished and subjected to unfair treatment due to her protected status of differing color and race and for retaliation for her previous protected activities because they resulted in the removals of various well-connected persons in supervisory positions as evinced by the continual denial of her rights and her being given a more strenuous, less desirable caseload.
66. From Ms. Windsor's experiences, she firmly believes that the County has a clear discriminatory "pecking order" which is African-American females, African-American males, Caucasians, Asians, Latinos, and then everyone else to include multi-racial persons that are not the "right color" or Afro-centric in dress and/or conduct.
67. Various other changes took place with the Supervisors because of budgeting and because of Superintendent and other leadership changes which resulted in Ms. Janice Briscoe once again becoming Ms. Windsor's supervisor.

EEOC Complaint Matter 2011- Present

68. During the summer of 2011, prior to the return of 10 month Pupil Personnel Workers to duty for the 2011-2012 school-year, Ms. Briscoe e-mailed various Pupil Personnel Workers information about the availability of newly created positions to be located at the Board of Education as hearing officers in the Office of Appeals.
69. Ms. Windsor did not receive the email notice of these positions nor did she receive the email notice of when and where to report back to duty for the 2011-2012 school year.
70. Ms. Windsor informed Ms. Briscoe that she did not receive these emails and Ms. Briscoe allowed Ms. Windsor to interview; however, at that time, 3 persons had already been selected out of the alleged 5 positions.
71. Ms. Windsor interviewed with Board attorney, Ms. Shauna Battle, and was invited back for a second round of interviews/to observe those already selected as they conducted a hearing in the Appeals Office.
72. After Ms. Windsor completed the observation of those in the Office of Appeals, Ms. Battle informed Ms. Windsor that she did not think she would be able to offer Ms. Windsor the position as the Chief, Ms. Karyn Lynch, did not approve the additional 2 positions.

73. Upon the realization that she had applied for a non-existent position, Ms. Windsor then met with Ms. Briscoe to discuss her concerns that the interview process was not done fairly since she did not receive the email notification about the positions until after all of the real and actual existing positions were already filled and that the positions were not posted in accordance with the Negotiated Agreement.
74. Ms. Briscoe coldly replied that she could hire anyone that she wanted because people apply for jobs all the time and don't get them.
75. Because of Ms. Briscoe's condescending demeanor, Ms. Windsor asked Ms. Briscoe if she held any animosity towards Ms. Windsor for her being removed from the Associate Superintendent position for the events that occurred at Crossland High School.
76. Ms. Windsor sought the assistance of her Union (Prince George's Educators Association), in spite of Ms. Briscoe mentioning that her cousin Donald Briscoe was/had been the President of the Union. This proved to be unsuccessful as an Union representative, Ms. Jimalatice Thomas- Gilbert, had previously informed Ms. Windsor that she was disliked because of her color i.e. she was "hated on" because she was "pretty" and suggested that Ms. Windsor "dumb herself down." Ms. Windsor was also informed as it pertained to Ms. Briscoe that she had "black-balled" by Ms. Briscoe so moving up in the system would be near impossible due to her many connections, known and unknown to the Union.
77. Ms. Briscoe gave Ms. Windsor a new duty assignment and Ms. Windsor was again moved for someone with less seniority than her from her base school of Annapolis Road Academy. Ms. Windsor was then assigned to Northwestern High School, where she had been voluntarily assisting the Supervisor's by covering for a Pupil Personnel Worker that retired in April of the previous school year.
78. Mr. Jones, the assistant principal that had been previously removed from Forestville Military Academy for investigations that Ms. Windsor was a part of, was also at Northwestern High School but had not bothered her for the months of April to June as she was not there on a full time basis and because the then Principal, Mr. Thomas, was familiar with the history of Mr. Jones and said that he would make certain that Mr. Jones did not harass Ms. Windsor.
79. Upon notice that Northwestern would be Ms. Windsor's new base placement, Ms. Windsor informed the new principal, Mr. Edgar Batenga, and her current supervisor, Ms. Briscoe, of her past history with and reservations about working with Mr. Jones given that he had previously made a "hit list" with her name on it.

80. Neither Ms. Briscoe nor Mr. Batenga took preventative measures to ensure that Mr. Jones would not engage in acts of retaliation and Ms. Briscoe told Ms. Windsor to "deal with it" as she had no intention of moving her from Northwestern.
81. Mr. Jones immediately took an aggressive stance against Ms. Windsor and constantly "bad mouthed" Ms. Windsor throughout the building to the other Assistant Principals. Mr. Jones also engaged in retaliatory acts meant to do harm to Ms. Windsor's career by making a report to Ms. Windsor's Chief, Ms. Karyn Lynch, about a document that Ms. Windsor created to assist the counselors in providing a statement for inclusion in the expulsion packets that Ms. Windsor was charged to collect.
82. In her rebuttal against Mr. Jones' report to her Chief, Ms. Windsor explained to the Ms. Lynch that she had already asked the Principal if he wanted her to create the document in question and had gotten it approved by the Mr. Batenga prior to sending it to Mr. Jones and the Counseling department at Northwestern High School.
83. Ms. Windsor then informed the Chief, Ms. Karyn Lynch, of the history between both Mr. Jones and herself and Ms. Briscoe and herself and of her present discrimination, harassment, and retaliation concerns.
84. Ms. Lynch did not follow the County's Administrative procedure (AP 4170) but instead erroneously scolded Ms. Windsor for requesting a document from the counselors that Ms. Lynch did not know Ms. Windsor had been instructed to collect. After Ms. Windsor showed Ms. Lynch where she had been instructed to collect the document at the last PPW in-service, Ms. Lynch did not apologize for her scathing remarks but furthered her criticism of Ms. Windsor by pointing out a typographical error and did not address Ms. Windsor's placement or retaliation concerns.
85. After Ms. Lynch failed to follow the AP 4170, Ms. Windsor then filed a report with Ms. Elizabeth Davis in the Equity Office about Ms. Briscoe's omission of her from the email notification for the positions in the Office of Appeals and the return to work notice and about Ms. Lynch's failure to follow the County's Administrative procedure.
86. At the mediation conference held by Ms. Davis, Ms. Briscoe produced an email that had Ms. Windsor's name included in the recipient list followed by the names of two other Pupil Personnel Workers.

87. Ms. Windsor contacted those two persons after the meeting and they too stated that they had not received the email notification; one was also a very light complexioned Pupil Personnel Worker, Ms. Veronica Carson, and the other had not even been hired at that time.
88. When Ms. Windsor brought this to the attention of Ms. Davis, the email then changed again with the removal of the non-hired individual's name. This showed Ms. Windsor that the Supervisor or the employers had the ability to manipulate emails.
89. Ms. Davis then requested to meet with Ms. Windsor as a follow-up to share her findings and at that time she informed Ms. Windsor that while she could not speak for Ms. Briscoe, she was very familiar with and fond of Ms. Lynch so nothing would be done in regards to Ms. Windsor's complaint about the interview process or in regards to a change of placement from Northwestern to the Office of Appeals.
90. Ms. Davis informed Ms. Windsor that Ms. Shauna Battle stated unfavorable things about her interview for the position in the Office of Appeals to which Ms. Windsor replied this was a big change from the positive exchanges that they had previously had with Ms. Battle even asking Ms. Windsor back to observe the happenings in the Appeals Office as she had not done for any other candidate. (Upon pointing this out, Ms. S. Battle then extended an invitation for all interested Pupil Personnel Workers to come observe the process in the Office of Appeals.)
91. Ms. Davis then laughed and said, "Nothing will be done, you will not be moved." Ms. Windsor then stated that as it was quite far along in the school year at this point that she would want to finish this year at her current placement for continuity of service to her students and colleagues. Ms. Davis again laughed and remarked, "Good, because nothing will be done."
92. Ms. Davis then continued to taunt Ms. Windsor and told Ms. Windsor to just, "Let it go, because nothing will be done." Ms. Davis then laughed as Ms. Windsor became noticeably upset with her eyes welling up with tears from Ms. Davis' insensitivity to the many ordeals Ms. Windsor had informed Ms. Davis that she had endured and Ms. Davis continued taunts. Ms. Windsor then left Equity Office realizing that she would not receive any equitable treatment or assistance from Ms. Davis with this matter.
93. Due to Ms. Davis' taunts, Ms. Windsor sought outside assistance and in May of 2012 Ms. Windsor went to file a complaint with the EEOC's Baltimore Office about the incidents involving Ms. Janice Briscoe, Ms. Karyn Lynch, and what appeared to be a cover up by both Ms. Elizabeth Davis and Ms. Shauna Battle.

94. After filing a complaint with the EEOC office at the end of the 2011-2012 school-year, Ms. Windsor then applied for another position during the summer of 2012 for an additional position to be added in the Office of Appeals for the 2012-2013 school year. The interview was conducted by phone with Ms. Shauna Battle, Board Attorney, and a party involved in Ms. Windsor's complaint to the Equity Office of the Board.
95. At the onset of the 2012-2013 school-year, Ms. Windsor noted that no additional person was added to the Office of Appeals and that Ms. Janice Briscoe had increased Ms. Windsor's caseload from 2 schools to 6 schools.
96. A position as the Supervisor of Pupil Personnel was advertised in January 2013 for which Ms. Windsor was a well-qualified, fully certified candidate with a history of satisfactory evaluations and a positive performance record as a leader in serving as an award winning Department Chairperson for Guidance.
97. During a monthly County-wide Pupil Personnel Worker meeting, Ms. Briscoe informed the Pupil Personnel Workers that she assisted in the selection of the committee but that she would not be on the committee.
98. Ms. Windsor applied for this position and upon arrival to be interviewed Ms. Wanda Battle of the Human Resource Department greeted Ms. Windsor and when Ms. Windsor introduced herself, Ms. Battle informed Ms. Windsor that she was familiar with her name. Ms. Windsor asked how she was familiar with her name, as they had never met, but Ms. Battle did not offer an explanation.
99. Mr. Anthony Boyd, Court Liaison, was also standing outside of the interview room and greeted Ms. Windsor. Mr. Boyd then went on to inform Ms. Windsor of his plans for Ms. Windsor for the next school year at her current assignment; thus, indicating that he had no intention or given no real consideration of Ms. Windsor being selected for the Supervisor of Pupil Personnel position.
100. During the interview, Ms. Windsor noted that the interview panel had persons on it that were not appropriate as they were not unbiased since one was directly involved in her Equity Office complaint, Ms. Shauna Battle, and another person, Mr. Anthony Boyd, a direct subordinate to Ms. Briscoe, had just indicated that Ms. Windsor would be at her current placement again next year.

101. As the interview progressed, Ms. Windsor noticed that those persons seated next to her, Mr. Boyd and Board attorney, Ms. Robyn Shell, were not writing down all of the key points that Ms. Windsor was making especially about her plans to develop a curriculum for the department to be in compliance with the new national PARCC initiative/Common Core. Ms. Shauna Battle also had to be reminded of the format and about her manner of discourse by Ms. Wanda Battle as Ms. S. Battle began to try to interrogate Ms. Windsor about her answers by asking additional question in rapid secession.
102. At the conclusion of the interview, Ms. Wanda Battle of the Human Resource Department asked Ms. Windsor if she had any questions and stated that Ms. Windsor could contact her if she did.
103. Not wanting to upset the interview panel, Ms. Windsor did not ask any questions in front of the panel but contacted Ms. Battle by email later to ask how the interview panel was selected or if it had been properly pre-screened so that inappropriate persons or those with a conflict of interest would not be on the panel.
104. Ms. Wanda Battle stated that the panel was selected in accordance with HR procedure and guidelines; so, Ms. Windsor then asked for a copy of said guidelines.
105. Ms. Windsor went to the HR department and asked those there if there was an HR document or guidelines about how an interview panel was supposed to be selected. No one in the Office had heard of or knowledge of any such document.
106. Ms. Battle then came out of her office located in that HR department and stated that she had referred the matter to the Chief, Douglas Anthony, and for me to address my concern with him.
107. Ms. Windsor then emailed the Acting Chief of Human Resources, Mr. Douglas W. Anthony, about her concern about HR guidelines and explained that she was interviewed by an inappropriate, biased panel.
108. Mr. Anthony tried to evade answering Ms. Windsor's question and did not want to address Ms. Windsor's concerns so Ms. Windsor emailed her concerns to the Board of Education. Only one Board member, Ms. Higgins, replied and wanted this HR matter addressed.
109. Mr. Anthony then sought the assistance of legal counsel, Ms. Shauna Battle, whom had also been on the interview panel.

110. Mr. Anthony then tried to explain that the panel was selected according to HR policy but, when Ms. Windsor asked for a copy of the guidelines, Mr. Anthony had to admit that no documents existed as Ms. Windsor had previously been told. Thus, seemingly every interview the Board has ever held was not comprised of appropriate individuals/panelists nor done by adequate and appropriate interviewing protocol.
111. Mr. Anthony explained that it was a matter of practice for HR personnel to screen the panel to make certain that all persons on the panel are in a Supervisory position and for panel members that may be biased or that may have a conflict of interest to recuse themselves from the panel.
112. Mr. Anthony directed Ms. Windsor to further address her concerns with Mr. Gaskins and Ms. Wanda Battle. Mr. Gaskins and Ms. Wanda Battle met with Ms. Windsor to review her scores at which time Ms. Windsor stated that the written HR guidelines that Ms. Battle had previously stated she followed did not exist and that the oral guidance Mr. Anthony had given was also not followed.
113. During the meeting Ms. Windsor noted her concerns for the students and stakeholders if discriminatory practices of hiring from the "friends and family plan" were allowed to continue and mentioned that this practice had afforded the Prince George's County School system with a rank next to last in the State at that time which Ms. Windsor believed was partly from the gross failing of HR to screen and hire adequate leadership.
114. Ms. Windsor even mentioned that she had to show her new supervisor how to disaggregate the very data she was supposed to address and improve. Ms. W. Battle smiled and stated that some people just interview well. Ms. Windsor then stated that not having proper screening and interviewing in place to take into account actual work performance and not popularity will continue to allow persons to trick HR and perpetuate the cycle of non-achievement.
115. Ms. Windsor asked Mr. Douglas Anthony, the Board, and Mr. Robert Gaskins for assistance with this matter as her interview was not conducted in accordance HR documents that she had found/proven not to exist by Mr. Anthony's confession nor was Ms. Windsor's interview in compliance with the verbal HR guidelines that Mr. Anthony said were a matter of practice.
116. In spite of HR failing to follow its own internal policy to prevent bias and acts of retaliation, no change was made and the decision of the panel to select Ms. Jacqueline Naves, a friend of both Ms. Briscoe (as indicated by Ms. Briscoe allowing Ms. Naves to go into her purse to answer her personnel cellphone during a County-wide PPW meeting) and Mr. Boyd, went undisturbed.

117. As the new Supervisor, Ms. Naves partnered with Mr. Anthony Boyd, the Court Liaison, to hold cluster meetings about the attendance rates in the high schools. At that time Mr. Boyd began to scold, raise his voice at Ms. Windsor for not being alarmed at the attendance data he and Ms. Naves had shared with her. Ms. Windsor then calmly explained that they had a list of all absences and did not disaggregate the data into excused and unexcused. When Ms. Naves and Mr. Boyd changed their tone and humbly explained that they did not know how to do this, Ms. Windsor kindly sent them directions and offered to in-service the department.
118. As the new Supervisors, Ms. Naves, immediately sought to observe Ms. Windsor although Ms. Windsor was not on-cycle for evaluation.
119. Ms. Naves made and cancelled several appointments to visit Ms. Windsor and then arrived one hour late which was at the end of the allotted time for the final agreed upon appointment.
120. While in Ms. Windsor's office Ms. Naves had nothing of substance to discuss and ended the meeting by glaring at Ms. Windsor for several minutes before leaving.
121. During March of 2013, the EEOC held a mediation between the Board and Ms. Windsor but an agreement was not reached.
122. Ms. Windsor submitted mileage for her travel to attend a MAPP Conference in Ocean City, Maryland, that Ms. Naves had approved her leave to attend, and it was denied for the first time as it had been approved every year prior to Ms. Windsor submitting an EEOC complaint.
123. At the end of the school year, Ms. Windsor asked Ms. Naves for her duty assignment for the next year, 2013-2014, in accordance with the Negotiated Agreement but Ms. Naves did not provide it.
124. Ms. Naves announced that there would be positions open in the Office of Appeals and in the Homeless Office and that all were welcome to apply.
125. Ms. Windsor being fully qualified, submitted the necessary documents and made application for the position in the Office of Appeals.
126. Upon arrival for the interview, Ms. Windsor noted that she was one of three applicants for the previous 3 position in that office as Dr. Joseph Ogunsanya and Dr. James Huntley were also there.

127. When Ms. Windsor entered the interview room, she noted that the interviewers were again not in compliance with the HR guidelines that the Chief of HR said were in place and to be adhered to as the interviewers were: Janice Briscoe, Special Projects Supervisor (for which EEOC complaint was originally filed); Aaron E. Price, Attorney; Darlene Davis, Pupil Personnel Transition Worker (non-Supervisory); and Kytemique Freeman, Secretary (non-Supervisory).
128. When Ms. Windsor again reported the failure of HR guidelines to be adhered by the interviewers to Chief Anthony, as the panel was not in compliance, and that Ms. Windsor had completed the interviewing techniques course with his friend, Mr. Damon Jones, as was suggested, Chief Anthony met with Ms. Windsor.
129. During this meeting, Ms. Windsor explained that Mr. Damon Jones had informed her that Chief Douglas W. Anthony had assisted him in getting a position upon Mr. D. Jones' return to the County. Thus, Ms. Windsor asked why Chief Anthony was not able or willing to assist her as she had clearly shown him that twice HR agents had failed to follow policies that he said were to be adhered to and this failing of HR had twice had negative employment actions against her by hindering her ability to be promoted and stifling her ability to advance her career.
130. Mr. Douglas Anthony stated that some of his subordinates followed directions better and were further along on the learning curve when it came to complying with his HR directives but offered no further assistance or corrective action for what had already twice happened to Ms. Windsor other than to say that he would try to make certain that it did not occur a third time.
131. Mr. Anthony told Ms. Windsor that she needed to inform her new Chief of Student Services, Mr. Douglass Williams, about all that had transpired and her history with these persons and that Ms. Windsor should notify Chief Anthony when she interviewed in the future so that he could make certain an appropriate panel gets selected.
132. Ms. Windsor explained that she did not wish to have such a conversation with the new Chief as Mr. Williams had invited her to shadow him in his role of Chief and she did not want anything to affect his opinion of her; unfortunately, Chief Anthony insisted and explained that he was going to speak with Chief Williams so it would be in her best interest to do so as well.
133. Ms. Windsor met with Chief Williams as directed by Chief Anthony; however, upon arrival Ms. Windsor saw Ms. Naves enter and speak with the Chief prior to her being able to address her concerns with him.

134. Ms. Naves then exited the office of Chief Williams and Ms. Windsor entered; unfortunately, the Chief's demeanor towards Ms. Windsor was now different. He was abrasive as Ms. Windsor shared her history of and current concerns with harassment and retaliation by Ms. Briscoe, Ms. Lynch, Ms. Davis, Ms. Sessoms, and Ms. Naves; however, the Chief concluded that meeting by stating that he would look into these concerns and get back with Ms. Windsor.
135. During the summer, Dr. Kevin Maxwell became the new CEO and Ms. Windsor attended his meet and greet program at Crossland High School at which time Mr. Maxwell asked Ms. Windsor where she was assigned. Ms. Windsor explained that her Supervisor, Ms. Naves, had not yet informed her to which Dr. Maxwell stated he wished for Ms. Windsor to apprise him of developments and he wanted to look into that.
136. Ms. Windsor sent follow-up questions about placement to Ms. Naves and copied the CEO per his directive to update him of the situation. Ms. Windsor also copied the Chief as she did not want him to feel that she was going over his head in a behind the back manner.
137. The Chief immediately responded in defense of Ms. Naves explaining that it was inappropriate to copy the CEO on such a trivial matter to which Ms. Windsor informed the Chief that she did so as a follow up to a request the CEO had made when she met him.
138. After some time had passed, Ms. Windsor asked Chief Williams if he had completed his inquiry Ms. Windsor's harassment and retaliation concern (as it was well beyond the 45 days for him to be in compliance with the County's administrative procedure, AP 4170 to address such matters).
139. The Chief responded in an angry tone and also indicated that he was not willing to allow Ms. Windsor to shadow him as he had previously agreed for a least 6 months and he copied this email to Ms. Naves along with his opinion on what Ms. Windsor had discussed with him. However, when Ms. Windsor asked him about what he discussed with Ms. Naves, Chief Williams stated that it would be unprofessional to discuss that with Ms. Windsor (which Ms. Windsor believes was clearly inequitable treatment).
140. Ms. Naves came to Ms. Windsor's school again, though Ms. Windsor is still not on-cycle for evaluation, and discouraged Ms. Windsor from communicating with the CEO.

141. Notably, after mentioning her concerns and history of harassment and retaliation to the Chief Williams, Ms. Naves and Ms. Sessoms agreed to have Ms. Windsor cover a presentation that Ms. Sessoms was supposed to conduct without the consent of Ms. Windsor. This notification was sent to Ms. Windsor after duty-hours and before she was due back on duty the next business day; thus, Ms. Windsor was not aware and the Principal of the school to which Ms. Windsor to report to cover for Ms. Sessoms thought Ms. Windsor merely did not show up. This could have adversely affected perceptions about the work performance of Ms. Windsor and had negative consequences upon Ms. Windsor's reputation, evaluation, and, subsequently, her advancement.
142. Shortly thereafter, both Chief Williams and Ms. Windsor applied for and were accepted into the National Superintendent's Academy (SUPES Academy) at which time the Chief was able to work with Ms. Windsor without the influence of others. The Chief stated that when he arrived to PGCPs he made the mistake of trusting the wrong people. The Chief applauded Ms. Windsor and announced her achievement at the Division meeting for Pupil Personnel Workers and Professional School Counselors of completing this prestigious program with him.
143. During Ms. Windsor's time in SUPES Academy, Ms. Traketa Wray of the Human Resource department explained how she had created a "cheat sheet" to help Supervisors and Administrators "get rid of bad teachers." Ms. Wray offered to give this information to the class; however, upon Ms. Windsor's request, Ms. Wray stated that she could not share this information. This document explained the steps to "paper" an employee's file and other measure to be taken to have his/her employment terminated. Ms. Windsor then noted that HR had personnel that were not neutral but clearly on the side of the Administration against those in Ms. Windsor's unit.
144. Ms. Windsor also received resistance from the office of the Court Liaison, Mr. Anthony Boyd, as she forwarded packets to IAC to assist her students and their families as she her cases were delayed, though submitted prior to that of others, for months; thus, also affecting the service delivery to the students. This delay could adversely affect Ms. Windsor's job performance rating as it impacted her ability to improve the attendance rate.
145. While attending a monthly County-wide meeting Ms. Windsor discovered that although Ms. Naves has twice been to Ms. Windsor's school to address her, Ms. Naves had yet to visit some PPW's at all and has not even been looking at the report submissions of various other PPW's as a fellow PPW openly admitted to the audience that he had been doing them all wrong in a County-wide PPW meeting.
146. Realizing that she is continuing to be subjected to inequitable treatment and subject to retaliatory acts such as extra supervision since filing an EEOC complaint, Ms. Windsor again filed a complaint with the County's Equity Office during April of 2014.

147. The County again failed to follow its own administrative procedure as the complaint was not completed within the 45 day timeline and Ms. Windsor did not receive a response.

FIRST CAUSE OF ACTION-COLOR/RACE DISCRIMINATION

148. Paragraphs 1-147 are incorporated herein as if fully restated.
149. Having a lighter complexion than what is considered the norm for an African-American, Ms. Windsor is a member of a protected class under Title VII.
150. Ms. Windsor also identifies herself as Native-American, so Ms. Windsor is a member of a protected class under Title VII.
151. Defendants subjected Ms. Windsor to discrimination based on her color and race and created an intimidating and hostile work environment, adversely affecting the terms, conditions and privileges of Ms. Windsor's employment with the Prince George's County Public School system.
152. Ms. Windsor has been subjected to acts of physical aggression and name calling because of her color and race.
153. Ms. Windsor has consistently been denied her right to "bump" others based upon her seniority as others were and has consistently been denied placement requests.
154. Defendants' actions and conduct toward Ms. Windsor were in violation of Title VI of the Civil Rights Act of 1964, 42 U.S. C. § 2000d-7 in that the Board received federal funding and subjected Ms. Windsor to discrimination because of her color and race and thereby discriminated against the students by denying them equitable services.
155. Defendant's actions and conduct toward Ms. Windsor were also in violation of Title VII of the Civil Rights Act of 1964, 42 U.S. C. § 2000e-4, in that Ms. Windsor was subjected to discrimination because of her color and race.
156. Defendant's actions and conduct toward Ms. Windsor were also in violation of the Civil Rights Acts of 1866 and 1871, 42 U.S.S. § 1981 and 1983, in that Ms. Windsor was subjected to discrimination because of her color and race.

157. Furthermore, when Ms. Windsor asked for assistance in investigating the inequalities she had encountered, Defendant failed to take immediate action to prevent further occurrences and also failed to follow their own internal policies; thus, treating her disparately because of her color and race.
158. Ms. Windsor was well qualified for her position and all positions sought but was consistently denied alternate placements by her African-American supervisors based upon her seniority unlike that of her African-American coworkers.
159. Ms. Windsor was well qualified for the positions she applied for but was interviewed by a biased panel and denied promotion opportunity as all persons selected were African-American.
160. As a direct and proximate result of Defendants' actions, Ms. Windsor has suffered economic losses and future earning capacity has been damaged, in addition to suffering extreme emotional distress, anxiety, mental anguish, physical pain, medical conditions, personal humiliation, and damage to her good name and professional reputation and standing.

SECOND CAUSE OF ACTION- RETALIATION

161. Paragraphs 1-160 are incorporated herein as if fully restated.
162. Defendant was aware of Ms. Windsor's complaint as she first reported this to her Ms. Karyn Lynch and then filed a complaint with the Prince George's County Public Schools' Equity Office with Equity Officer, Ms. Elizabeth Davis.
163. By filing in accordance with the County's Administrative Procedure (4170) with the Equity Office, Ms. Windsor was engaged in a protected activity under Title VI of the Civil Rights Act.
164. Further, by filing with the Equity Office, Ms. Windsor was engaged in a protected activity under Title VII of the Civil Rights Act.
165. Further, by filing with the Equity Office, Ms. Windsor was engaged in a protected activity under the Civil Rights Acts of 1866 and 1871, 42 U.S. C. §§ 1981 and 1983.
166. After filing with the Equity Office, Ms. Windsor was taunted by the Equity Officer, Ms. Davis and told that nothing would be done.
167. Ms. Windsor then filed with the EEOC office, a protected activity under Title VI of the Civil Rights Act.
168. Further filing with the EEOC office was also a protected activity under Title VII of the Civil Rights Act.

169. Defendants retaliated against Ms. Windsor based upon her internal EO complaint and her EEOC complaint in opposition to employment practices that she believed to be unlawful in violation of Title VI.
170. Defendants retaliated against Ms. Windsor based upon her internal EO complaint and her EEOC complaint in opposition to employment practices that she believed to be unlawful in violation of Title VII.
171. Defendants retaliated against Ms. Windsor based upon her internal EO complaint and her EEOC complaint in opposition to employment practices that she believed to be unlawful in violation of the Civil Rights Acts of 1866 and 1871, 42 U.S.C. §§ 1981 and 1983.
172. The EEOC issued a Right to Sue Letter on April 22, 2014 and Plaintiff received the Notice of May 1, 2014, thereby filing this lawsuit within the 90-day time frame. (Attached/Exhibit 1)
173. As a direct and proximate result of Defendants' actions, Ms. Windsor has suffered economic losses, including back pay and front pay, and future earning capacity has been damaged, in addition to suffering extreme emotional distress, anxiety, mental anguish, physical pain, medical conditions, personal humiliation, and damage to her good name and professional reputation and standing.

THIRD CAUSE OF ACTION-HOSTILE WORK ENVIRONMENT

174. Paragraphs 1-173 are incorporated herein as if fully restated.
175. Ms. Windsor was the subject of unwelcome harassment because of her color.
176. Ms. Windsor was the subject of unwelcome harassment because of her race.
177. This harassment was severe and pervasive, and it altered the conditions of Ms. Windsor's employment.
178. The harassment came in the form of failure to thoroughly investigate all complaints made by Ms. Windsor, Defendant's failure to follow Defendant's own written policies, Defendant's failure to Defendant's own verbal policies of practice, and subjecting Ms. Windsor to extra scrutiny/monitoring that her coworkers were not subject to call into question and undermine Ms. Windsor's competence and integrity.
179. Ms. Windsor alerted her supervisors, her Union, and the Board of Education via emails, letters, and phone calls regarding the harassment she was experiencing, but her employer failed to take adequate remedial actions.
180. As a direct and proximate result of Defendants' actions, Ms. Windsor has suffered conditions requiring medical attention and monitoring as the stress has put Ms. Windsor in a pre-diabetic state and brought about concerns for organ (including heart) health.
181. As a direct and proximate result of Defendants' actions, Ms. Windsor has suffered economic losses, including back pay and front pay, and future earning capacity has been damaged, in addition to suffering extreme emotional distress, anxiety, mental anguish, physical pain, medical conditions, personal humiliation, and damage to her good name and professional reputation and standing.

JURY TRIAL DEMAND

182. Plaintiff respectfully requests a trial by jury.

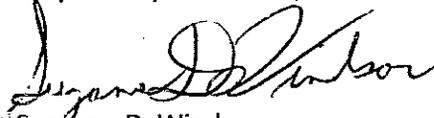
WHEREFORE, for the foregoing reasons, Plaintiff respectfully prays this Court award the following relief:

- a) For all past pecuniary loss including back pay, emotional pain, suffering, inconvenience, and mental anguish;
- b) For all future pecuniary losses including front pay, emotional pain, suffering, inconvenience, mental anguish, physical pain, suffering, and inconvenience;
- c) Reasonable attorney's fees and costs as provided under Title VII or any other applicable statute;
- d) Punitive damages;
- e) Any other relief the Court deems appropriate.

WHEREFORE, the premises considered, the Plaintiff demands judgment against the Defendant(s) in the amount of five million dollars (\$5,000,000).

Dated: July 18, 2014

Respectfully Submitted,



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