

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Peter Pryce  
11801 Jester Court  
Bowie, Maryland 20721

Plaintiff,

v.

Board of Education for  
Prince George's County  
Prince George's County Public Schools  
14201 School Lane  
Upper Marlboro, MD 20772

Defendant.

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Civil Action No.:

JURY TRIAL DEMAND

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COMPLAINT

NOW COMES, Peter Pryce, Plaintiff, (hereinafter "Plaintiff" or "Pryce"), through counsel, Thomas B. Corbin, P.A. and complains against Defendant, the Board of Education of Prince George's County (hereinafter "Board"), and in support thereof states the following:

**Jurisdiction and Venue**

1. This action arises under the provisions of the Title VII of the Civil Rights Act of 1964, (Title VII), as amended, 42 U.S.C. §§ 2000e, *et seq.*, and the Civil Rights

Act of 1981, 42 U.S.C. § 1981, as hereinafter more fully appears. The subject matter jurisdiction of this Court is properly invoked pursuant to the provisions of 28 U.S.C. §§ 1331 and 1343, Venue is proper in this Court pursuant to 42 U.S.C. § 2000e. This Court has personal jurisdiction over the Defendant as a citizen of Maryland, or as a person who transacts business within the State of Maryland.

### **Nature of the Action**

2. Plaintiff brings this action to secure protection of rights granted under the statutes mentioned above, to redress deprivation of rights thereunder, and to obtain such other relief as is necessary to redress the injury to Plaintiff resulting from Defendant's violation of those statutes.
3. Plaintiff's damages are significant, including, but not limited to, the loss of salary, reputation, career advantage, emotional tranquility and denial of his constitutional and statutory rights.

### **Parties**

4. Plaintiff, Peter Pryce, (hereinafter "Plaintiff or Pryce") is an adult citizen of the United States and a citizen of the State of Maryland.
5. Defendant, Board of Education for Prince George's County, (hereinafter "Defendant or Board") is responsible for the operation of the Prince George's County Public School System.
6. During all relevant times, Defendant employed Pryce.

7. At all relevant times, Defendant was an “employer” as defined by 42 U.S.C. § 2000e(b), and employed the requisite number of employees.

#### **Administrative Procedure**

8. In January 2006, Pryce filed a timely charge of discrimination with the Maryland Commission On Human Relations (MCHR), alleging race and national origin discrimination, as well as, retaliation.
9. A Notice of Right to Sue was issued on September 06, 2007, by the Baltimore District Office of the Equal Employment Opportunity Commission (EEOC).
10. Having met all procedural prerequisites set forth in § 706 of Title VII (42 U.S.C. § 2000e-5), Pryce filed the instant lawsuit, within 90 days of his receipt of the Notice.

#### **Allegations Common to All Counts**

11. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 10 with the same effect as if herein fully set forth.
12. Plaintiff is a Black male.
13. Plaintiff's national origin is Ghanaian.
14. Plaintiff commenced his employment with Defendant in 2004, and continues in the school system today.
15. During all relevant times, Pryce has been employed as a teacher within Defendant's public school system.

16. During all relevant times, Pryce has performed his work in a satisfactory manner.
17. Over time, Pryce has been subjected to verbal harassment from students and security personnel concerning his race and national origin.
18. Comments such as “nigger,” “a f—king speech teacher from Ghana to teach us,” “watch your back,” and “go back from where you came from” typify the harassment Plaintiff has endured from students.
19. Students and other personnel have also assaulted Pryce.
20. Pryce complained about the harassment in writing to his principal, Fletcher James.
21. No administrative action was initiated to abate the harassment toward Pryce, and the daily abuse has traumatized Plaintiff into a medical leave of absence.
22. Pryce was given an unsatisfactory evaluation in September 2004, after receiving an excellent evaluation in August 2004.
23. In 2005, Pryce was involuntarily transferred three (3) times within fifteen (15) months.
24. Over time, Pryce’s attempts to appeal his transfers have been unsuccessful.
25. Beginning in 2004, Defendant withheld wages from Pryce at least five (5) times, most recently in the months of August, September and December 2005.
26. Defendant continues to owe wages to Pryce that he earned in 2004.
27. Pryce was subjected to reprimands several times over the school public address system.

28. In November 2005, Plaintiff, a licensed professional, was assigned to a para-professional teacher aide's position at John Hanson Middle School.
29. Defendant terminated Plaintiff's medical coverage for ten (10) days, while he was receiving medical treatment in January 2006.
30. Defendant intentionally misinformed U.S. Office of Immigration concerning Plaintiff's work status, which resulted in the closure of Plaintiff's work visa application.

**COUNT I**

**(Action under Title VII for Discrimination Based Upon National Origin)**

31. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 30 with the same effect as if herein fully set forth.
32. Pryce's national origin is Ghanaian.
33. Over time, Pryce as been subjected to verbal harassment from students and security personnel, and discipline and reassignment by administrators because of his national origin.

**COUNT II**

**(Action under Title VII for Discrimination Based Upon Race)**

34. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 33 with the same effect as if herein fully set forth.

35. Over time, Pryce has been subjected to verbal harassment from students and security personnel concerning his race.

36. Pryce has been treated less favorably than other employees outside of his protected class.

37. Defendant's unlawful employment practices were committed with deliberate indifference towards the well-being and rights of Plaintiff.

38. The unlawful employment practices complained of herein were done intentionally, with malice or with reckless indifference to the federally protected rights of Plaintiff.

**COUNT III**

**(42 U.S.C.A. § 1981)**

39. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 38 with the same effect as if herein fully set forth.

40. Over time, Pryce has been subjected to verbal harassment from students and security personnel concerning his race.

41. Pryce has been treated less favorably than other employees outside of his protected class.

**COUNT IV**

**(Retaliation)**

42. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 41 with the same effect as if herein fully set forth.

43. Pryce complained about the harassment and assaults in writing to his principal, Fletcher James.
44. No administrative action was initiated to abate the harassment toward Pryce, and the daily abuse has traumatized Plaintiff into a medical leave of absence.
45. Pryce was given an unsatisfactory evaluation in September 2004, after receiving an excellent evaluation in August 2004.
46. In 2005, Pryce was involuntarily transferred three (3) times within fifteen (15) months.
47. Over time, Pryce's attempts to appeal his transfers have been unsuccessful.
48. Beginning in 2004, Defendant withheld wages from Pryce at least five (5) times, most recently in the months of August, September and December 2005.
49. Defendant continues to owe wages to Pryce that he earned in 2004.
50. Pryce was subjected to reprimands several times over the school public address system.
51. In November 2005, Plaintiff, a licensed professional, was assigned to a para-professional teacher aide's position at John Hanson Middle School.
52. Defendant terminated Plaintiff's medical coverage for ten (10) days, while he was receiving medical treatment in January 2006.
53. Defendant intentionally misinformed U.S. Office of Immigration concerning Plaintiff's work status, which resulted in the closure of Plaintiff's work visa application.

**WHEREFORE**, Plaintiff, Peter Pryce, prays this Court to grant the following relief:

- A. That this Court grants a permanent injunction, enjoining Defendant, its officers, agents, servants and employees, attorneys and all persons in active concert or participation with them, including their successors and assigns, from engaging in any employment practice which discriminates against individuals based the unlawful practices delineated in this Complaint.
- B. That this Court enters an Order commanding the Defendant to carry out policies and programs, which provide equal employment opportunities, and which will eradicate the effects of their past and present unlawful employment practices;
- C. That this Court enters judgment in favor of Plaintiff and against the Defendant, for appropriate back wages and front wages, and benefits, with prejudgment interest in amounts it is determined that Plaintiff loss because of Defendant's unlawful conduct.
- D. That this Court enters judgment in favor of Plaintiff and against Defendant for compensatory damages in the amount of \$1,000,000.00 and punitive damages in the amount of \$1,000,000.00.
- E. That this Court orders Defendant to reinstate Pryce into his former position, or to a position substantially similar to the one that Pryce loss, and otherwise make him whole and;
- F. That this Court grants Plaintiff attorney's fees and costs in this matter and;

G. That this Court grants such further relief as the Court deems necessary and proper, and in the public interest.

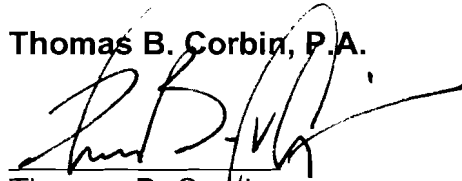
**Demand For Jury Trial**

Pursuant to Fed. R. Civ. P. 38(b), Plaintiff demands trial by jury for all issues pled herein so triable.

Dated this 3<sup>rd</sup> day of December 2007.

Respectfully submitted,

**Thomas B. Corbin, P.A.**



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