

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Lamar A. Williams

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

DEF 1 Equal Employment Opportunity Commission
Baltimore Field Office

DEF 2 Baltimore City Dept. of Public Works

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. SAG 25-CV-205

(to be filled in by the Clerk's Office)

Jury Trial: Yes No
(check one)

USDC - BALTIMORE
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Bk

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Lamar A. Williams</u>
Street Address	<u>P.O. Box 115</u>
City and County	<u>Perry Hall / Baltimore County</u>
State and Zip Code	<u>Maryland 21128</u>
Telephone Number	<u>443-846-9439</u>
E-mail Address	<u>lamarW@live.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>EEOC Baltimore Field Office</u>
Job or Title (if known)	<u>Investigation Department</u>
Street Address	<u>31 Hopkins Plaza, Suite 1432</u>
City and County	<u>Baltimore / Baltimore City</u>
State and Zip Code	<u>Maryland 21201</u>
Telephone Number	<u>410-801-6685</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	Baltimore City Dept. of Public Works
Job or Title (if known)	Various
Street Address	200 Holliday Street
City and County	Baltimore / Baltimore City
State and Zip Code	Maryland 21202
Telephone Number	
E-mail Address (if known)	

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- Federal question
- Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Maryland Public Information Act (Sections 4-101 through 4-601), Americans with Disabilities Act

Freedom of Information Act (5 U.S.C. § 552), 42 U.S. Code § 1983, 42 U.S. Code § 12203

Deliberate abuse of a United States Citizen with well known mental and physical disabilities

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Lamar A. Williams, is a citizen of the State of *(name)* MARYLAND.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* EEOC & Baltimore City DPW, is a citizen of the State of *(name)* Maryland. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____. Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

1) \$150,000 in lost income 2) \$3,000,000 in front pay 3) \$1,000,000 in medical expenses

4) \$300,000 in non-compensatory pay

5) An indiscriminate amount of punitive damages

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1) One of the defendants Baltimore City DPW, despite their full knowledge of my mental and physical disabilities per the details and results of Case No. GLR/LKG-22-01882, rehired me not to rectify their wrongs, but to instead retaliate even more so that they could embarrass me more than they could on July 26, 2022. They even went as far to assign me to a Supervisor who is notorious for making disparaging comments about his subordinates and colleagues.

2) They have refused to relinquish any of the discovery that I have requested in EEOC Case No. 531-2024-04911 that would prove that my job performance was nothing but exemplary despite all the difficulties that I was having during my probationary period

3) The EEOC Baltimore Field Office has done nothing to demand the evidence that I seek, and instead are planning to potentially dismiss the case and find no probable cause. In fact one of their workers tried to appease and coax me into accepting the EEOC's finding of no probable cause in September 2024. There is no way the EEOC could've finished their investigation without having obtained the discovery and questioned the witnesses I requested of them to question. Frankly speaking this is malarkey!

Lastly, this is just an initial statement, but as soon as this complaint is docketed a more detailed complaint will be submitted electronically.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

1) \$150,000 in lost income

2) \$3,000,000 in front pay

3) \$1,000,000 in medical expenses

4) \$300,000 in non-compensatory pay

5) An indiscriminate amount of punitive damages

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk’s Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk’s Office may result in the dismissal of my case.

Date of signing: Jan 22, 2025

Signature of Plaintiff

Printed Name of Plaintiff


Lamar A. Williams

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

Email Address _____