

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

EMANUEL M. THOMPSON \*  
\*  
PLAINTIFF \*  
\*  
V. \* CIVIL ACTION NUMBER JFM-13-3190  
\*  
G4S AMERICAN'S \*  
\*  
WACKEN HUT \*  
\*  
SERVICE \*  
\*  
DEENDANT \*

**COMPLAINT**

NOW COMES Plaintiff Emanuel Thompson, by and through counsel John Hopkins, Esq. and respectfully and respectfully seeks a finding of liability against Defendant G4S AMERICAN'S WACKEN HUT for the following reasons:

**FACTS**

1. That Plaintiff is a resident of Maryland, and has been so from 2003 to the present;
2. That Defendant G4 G4S AMERICAN'S WACKEN HUT contracts with the Nuclear Regulatory Commission at the location of Rockville, MD 11555, Rockville, MD 20785;
3. That the Plaintiff was previously employed with Defendant G4S American's Wackenhut. The Plaintiff began his employment on October 3, 2002;
4. That the Plaintiff was stationed at the U.S Nuclear Regulatory Commission in Rockville, MD. The Plaintiff worked at that station consistently until his wrongful termination. The Plaintiff served as the 3<sup>rd</sup> Relief Lieutenant from the year of 2004 until 2011;

5. That in the year of 2008, Gary Simpler was assigned to the Plaintiff's work location as the Contracting Officer Technical Representative (COTR);

6. That during COTR Gary Simpler's first encounter with the Plaintiff and two other black Lieutenants, he stated the following: "IF YOU FUCK ME I'LL COME AFTER YOU WITH EVERYTHING I GOT, I WILL CRUSH YOUR WINDPIPE CUT OFF YOUR NECK AND SHIT DOWN YOUR THROAT."

7. That COTR Gary Simpler made derogatory and racially charged statements during the course of employment with the Defendant;

8. That from 2009 through 2010, COTR Gary Simpler made, amongst other comments, the following racially charged comments:

"WHATS UP BRO! WHATS UP HOMIE! WHY YOU WEARING THOSE GOLD CHAINS LIKE P DIDDY? BLACK MEN ARE LIKE SOLDIERS IN IRAQ; THEY ARE JUST CONTENT WITH WHAT THEY GOT. CERTAIN STOPS ON THE METRO I DON'T GET OFF ON. WHY YOU PEOPLE DRIVE THOSE LUXURY VEHICLES? EDUCATE YOURSELVES YOU THAT ILLITERATE I HAVE TO COME DOWNSTAIRS AND TELL YOU PERSONALLY"

9. That the consistent nature of COTR Gary Simpler's derogatory and racial comments about black people and other ethnic minorities prompted the Plaintiff to write a complaint of racial discrimination in January of 2010. Karl McDonald, who was also a black supervisor, co-authored the complaint that the Plaintiff wrote in January of 2010;

10. That on January of 2010, the Plaintiff had a meeting with Branch Chief Darlene Fenton (Branch Chief), Adam Gaudreau (Security Branch), Richie Fisher (Former Project Manager). At that meeting, the Plaintiff apprised all of the attendants of Gary Simpler's racial and offensive comments;

11. That despite the Plaintiff's complaints, no action was taken against COTR Gary Simpler;

12. That COTR Gary Simpler continued to make racially charged and derogatory comments to the Plaintiff and others. In April of 2011, the Plaintiff and Karl McDonald wrote another complaint against Contracting Officer Technical Representative Gary Simpler. At that period, the Plaintiff and Karl McDonald met with Branch Chief Darlene Fenton regarding Gary Simpler's comments. Subsequent to that meeting, Thompson was moved to day shift, where he earned less money and was forced to work six (6) days a week. Further, no action was taken against COTR Gary Simpler;

13. That on or around September 15, 2011, the Plaintiff was discharged. Fellow black supervisor Karl McDonald was also demoted twice and eventually discharged. Karl McDonald was discharged around the same period as the Plaintiff. The alleged basis for the Plaintiff's termination was timesheet falsification;

14. That the alleged timesheet falsification was a pretext for the Plaintiff's wrongful discharge. The Defendant's true reason for terminating the Plaintiff was his rightful opposition to COTR Gary Simpler's racial discrimination;

15. That at all time of serving as an employee of the Defendant, the Plaintiff discharged his duties exceptionally. In fact, the Plaintiff has rightfully been characterized as exceeding the Nuclear Regulatory Commission's requirements;

16. That this action is brought pursuant to 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, religion, sex, or national origin;

17. That the facts Plaintiff's claim demonstrate racial harassment that was executed

and/or endorsed by the Defendant;

18. That the approximate number of people employed by the Defendant is 8500;

19. That the events at issue in this Complaint took place during the period of January 2010 to April 2011;

20. That Plaintiff filed charges with Equal Employment Opportunity Commission on December 31, 2011. The Plaintiff received a right to sue letter on February 6, 2014;

#### HOSTILE WORK ENVIRONMENT

1. That the Plaintiff incorporates by reference all of the previous and subsequent aspects of this Complaint external from the “HOSTILE WORK ENVIRONMENT” count;

2. That the Plaintiff was consistently subjected to Gary Simpler’s racially charged comments. Further, Gary Simpler’s comments and conduct were racially and ethnically oriented. Amongst other comments, Gary Simpler made disparaging comments about the Plaintiff’s race and ethnicity. Gary Simpler’s comments and conduct were so abusive and extreme that they prompted the Plaintiff to report his conduct, as asserted in paragraphs 9-12; and

3. That the Plaintiff seeks judgment against Defendant G4S AMERICAN’S WACKEN HUT for approximately \$750,000.00 in compensatory damages that are continuing in nature, \$1,000,000 in pain and suffering, and \$2,000,000.00 in punitive damages with interests and costs. The Plaintiff further seeks his rightful reinstatement in his prior position within G4S American Wacken Hut with interest and costs.

#### RACE DISCRIMINATION (TITLE VII)

1. That the Plaintiff incorporates by reference all of the previous and subsequent aspects of this Complaint external from the “RACE DISCRIMINATION (TITLE VII)” count;
2. That the Plaintiff, is/was an African-American. He performed in his capacity as a 3<sup>rd</sup> Relief Lieutenant in the absence of any dissatisfaction from the Defendant. The Employer only cited the Plaintiff for misconduct after the Plaintiff expressed concerns regarding Gary Simpler. Despite the fact that the Plaintiff’s concerns regarding Gary Simpler were corroborated by complaints by other coworkers of the Defendant and other officials and/or personnel, no action was taken against Gary Simpler. The disparity of the action taken against the Plaintiff and Gary Simpler is a byproduct of the Defendant’s ratification of discrimination. The Plaintiff was terminated to suppress his voiced concerns regarding Gary Simpler. The assertion of timesheet alteration was merely a pretext for the Defendant’s wrongful termination of the Plaintiff. The racial animosity towards the Plaintiff, and not any impropriety on the part of the Plaintiff, eventually climaxed into the wrongful termination of the Plaintiff;
3. That the Plaintiff seeks judgment against Defendant G4S AMERICAN’S WACKEN HUT for approximately \$750,000.00 in compensatory damages that are continuing in nature, \$1,000,000 in pain and suffering, and \$2,000,000.00 in punitive damages with interests and costs. The Plaintiff further seeks his rightful reinstatement in his prior position within G4S American Wacken Hut.

#### TITLE VII RETALIATION

1. That the Plaintiff incorporates by reference all of the previous and subsequent

aspects of this Complaint external from the “TITLE VII RETALIATION” count;

2. That after Gary Simpler would not discontinue his racially and ethnically charged comments, the Plaintiff voiced his concerns regarding the detrimental nature of Gary Simpler’s conduct;

3. That only after the Plaintiff voiced his concerns regarding Gary Simpler was he cited for employee misconduct and allegedly terminated for employee misconduct.

The underlying basis for the Plaintiff’s termination was his compliance with his obligation to report and refrain from discriminatory conduct. The Defendant’s cited basis for the Plaintiff’s termination was only a pretext for their racial and ethnical motivations that prompted the Defendant to terminate the Plaintiff for the purpose of silencing and/or disadvantaging the complaints about Gary Simpler’s discrimination; and

4. That the Plaintiff seeks judgment against Defendant G4S AMERICAN’S WACKEN HUT for approximately \$750,000.00 in compensatory damages that are continuing in nature, \$1,000,000 in pain and suffering, and \$2,000,000.00 in punitive damages with interests and costs. The Plaintiff further seeks his rightful reinstatement in his prior position within G4S American Wacken Hut.

WHEREFORE, Plaintiff Emanuel Thompson, by and through counsel John Hopkins, Esq. respectfully requests that this Court enter a finding of liability against Defendant G4S American Wacken Hut. Further, Plaintiff seeks the judgments, whether compensatory, regarding pain and suffering and/or punitive, to be awarded separately and distinctly as requested in each count. The Plaintiff further requests that this Court grant any other relief that it deems proper.

Respectfully Submitted,

John Hopkins, Esq.  
Law Office Of John Hopkins  
3515 37<sup>th</sup> Street  
Mount Rainier, MD 20712  
(301) 323-5169  
[johnhopkins413@hotmail.com](mailto:johnhopkins413@hotmail.com)  
Federal Bar Number 18733





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**COMPLAINT**

**NOW COMES Plaintiff Emanuel Thompson, by and through counsel John Hopkins, Esq. and respectfully and respectfully seeks a finding of liability against Defendant G4S AMERICAN'S WACKEN HUT for the following reasons:**

~~Emanuel M Thompson  
839 Geronimo Drive  
Frederick, Maryland 21701~~

**FACTS**

- 1. That Plaintiff is a resident of Maryland, and has been so from 2003 to the present;** ~~Residence from 2003 to present in the state of Maryland~~
- 2. State T**that Defendant G4 G4S AMERICAN'S WACKEN HUT contracts with the Nuclear Regulatory Commission at the location of Rockville, MD 11555, Rockville, MD 20785;
- 3. That the Plaintiff was previously employed with Defendant G4S American's**

Wackenhut. The Plaintiff began his employment on October 3, 2002;

**4. That** tThe Plaintiff was stationed at the U.S Nuclear Regulatory Commission in Rockville, MD. The Plaintiff worked at that station consistently until his wrongful termination. The Plaintiff served as the 3<sup>rd</sup> Relief Lieutenant from the year of 2004 until 2011.;

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**16. That t**This action is brought pursuant to 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, religion, sex, or national origin;

**17. That t**The facts of **Plaintiff's** ~~my~~ claim ~~are~~ **demonstrate** racial harassment **that was executed and/or endorsed by the Defendant;**

**18. That t**The approximate number of people employed by the Defendant is 8500;

**19. That t**The events **at issue in this Complaint took place during the period of January 2010 to April 2011** ~~I am complaining about took place on the following dates or time period: January 2010 to April 2011;~~

**20. That Plaintiff** ~~I~~ filed charges with **Equal Employment Opportunity Commission** on the following date: **December 31, 2011.** ~~12-31-11~~**The Plaintiff** ~~I~~ received a right to sue letter on the following date: ~~2-6-14~~ **February 6, 2014;**

### **HOSTILE WORK ENVIRONMENT**

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**3. That the Plaintiff seeks judgment against Defendant G4S AMERICAN'S WACKEN HUT for approximately \$750,000.00 in compensatory damages that are continuing in nature, \$1,000,000 in pain and suffering, and \$2,000,000.00 in punitive damages with interests and costs. The Plaintiff further seeks his rightful reinstatement in his prior position within G4S American Wacken Hut with interest and costs.**

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reinstatement in his prior position within G4S American Wacken Hut.

WHEREFORE, Plaintiff Emanuel Thompson, by and through counsel John Hopkins, Esq. respectfully requests that this Court enter a finding of liability against Defendant G4S American Wacken Hut. Further, Plaintiff seeks the judgments, whether compensatory, regarding pain and suffering and/or punitive, to be awarded separately and distinctly as requested in each count. The Plaintiff further requests that this Court grant any other relief that it deems proper.

Respectfully Submitted,

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Mount Rainier, MD 20712  
(301) 323-5169  
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Federal Bar Number 18733