IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

VANESSA J. SPRINGER 9314 Cherry Hill Road Apt 606 College Park, MD 20740 Plaintiff, **v.** **PRINCE GEORGE'S COUNTY, MD** **SERVE:** Stephanie P. Anderson, Esq. County Attorney Room 5121 14741 Gov. Oden Bowie Dr. Upper Marlboro, MD 20772 **and** **CPL. MICHELLE C. QUALLS #2664** ***Individually and as an employee of*** Prince George's County Police 7600 Barlowe Rd Landover, MD 20785 Defendants.	:	**CIVIL NO. CAL-09_____**

COMPLAINT AND JURY DEMAND

COMES NOW, the Plaintiff, Vanessa Joanna Springer, by and through her attorneys, Timothy F. Maloney, Puja Gupta, and the law firm of Joseph, Greenwald & Laake, P.A., and sues the Defendants, Prince George's County, Maryland, and Corporal Michelle C. Qualls, and as cause states the following:

JURISDICTION AND VENUE

1. This Court has jurisdiction under Md. Code Cts & Jud. Proc. (CJ) § 6-102 through § 6-103.

2. Venue is proper pursuant to CJ § 6-201. All material events occurred in Prince George's County, Maryland.

3. Plaintiff Vanessa Joanna Springer, is the aggrieved party in this suit and is an adult citizen of Prince George's County, Maryland.

4. Defendant Prince George's County, Maryland is a municipal corporation organized under the provisions of Art. XI-A of the Maryland Constitution. At all times mentioned, Defendant Prince George's County employed Cpl. Michelle C. Qualls, #2664, as a sworn police officer.

5. Defendant Cpl. Qualls #2664 is a sworn member of the Prince George's County Police Department, and at all times relevant hereto was acting in her official capacity as a police detective, and acting within the scope of her employment as an agent, servant and employee of Prince George's County, Maryland.

FACTS COMMON TO ALL CLAIMS

6. On or about December 4, 2008, Plaintiff Student Officer Vanessa J. Springer was unlawfully and repeatedly beaten in the head by Cpl. Michelle C. Qualls # 2664 after the end of a training scenario conducted on her final day of Basic Survival Training at the Prince George's Community Policing Institute.

7. Plaintiff was a Student Officer in Prince George's County Police Community Policing Institute ("CPI" or "the Academy") Session 114 from on or about May 27, 2008 through December 26, 2008. Plaintiff expected to graduate from CPI Session 114 on January 15, 2009.

8. Having completed all tasks required at the CPI as a Student Officer, Plaintiff, along with the rest of the class of fifty-five (55) students in the academy, was placed into one

of two groups, Group A, for the final block of instruction known as Basic Survival Training (BST). Group A was scheduled to perform BST activities, a final test for student officers, from November 24-26, 2008 and December 1-4, 2008. Group B was scheduled to perform BST activities from December 8-11, 2008 and December 15-18, 2008.

9. Basic Survival Training evaluates Student Officers over a series and variety of police-response scenarios. Student Officers are expected to call upon the previous months' instruction at CPI to respond as a County Officer should perform.

10. At the relevant time, BST took place in an abandoned military housing complex in Landover, Maryland, located approximately at the 8100 block of Summerfield Blvd. and commonly known as "Summerfield."

11. During a typical BST scenario, Student Officers are placed in a house known as the "Hooch" and are called by instructors via radio to report to a specific address in order handle the scenario. An instructor, located away from the Student Hooch, acts as a dispatcher from the Instructor's Hooch and instructs student officers via radio on the location and type of call to which the Student Officer must report. In this way, BST is meant to resemble real-life responses to calls actually responded to by County Officers.

12. During a typical BST scenario, Instructors are located throughout the Summerfield complex in order to oversee and conduct the scenarios. County police officers act as role-players in the scenarios. Some BST scenarios include, for example, report calls, where a Student Officer is expected to take a report of a complaint; compliant traffic stops; or non-compliant scenarios that result in a physical altercation between the Student Officer(s) and role-player(s).

13. A BST scenario begins when the instructor in charge of the scenario says to begin, and ends when the instructor in charge of the scenarios calls “Blue!” Upon information and belief, all Student Officers and Instructors with any knowledge of CPI trainings know that when “Blue!” is called, it is an instruction to stop the role-playing activity.

14. During Plaintiff’s BST at CPI, each BST Scenario was graded by the instructor or instructors conducting or observing the Scenario. Instructors wrote feedback and commentary on Plaintiff’s performance in the Scenarios in a BST book containing the scenarios performed. Satisfactory performances were graded as such. Students whose performance of the scenario was evaluated as unsatisfactory were frequently asked to perform the scenario again; such a performance is called a Remedial for the scene.

15. An Instructor requested a Remedial for the scene from a Student Officer whose performance is unsatisfactory at a particular BST scenario immediately after the conclusion of the scenario, later on the same day, or on the last day of BST reserved for Remedial Scenarios. For Group A, Plaintiff’s group, Remedial scenarios were conducted on Thursday, December 4, 2008, one of the last two days of BST.

16. Beginning on the second week of BST, Plaintiff’s lead instructor for Group A, Sergeant Salen, videotaped all or virtually every one of Plaintiff’s calls. Sgt. Salen videotaped Plaintiff at a customer dispute scene; at Plaintiff’s Signal 7 call when Plaintiff was required to apprehend a suspect on the ground; and was videotaped twice on a Signal 7 call where Plaintiff and Student Officer Boone took the call and Plaintiff fought a suspect while going down a hill, and again when Plaintiff, though successful on the first attempt, was asked to perform the scenario a second time for evaluation.

17. Plaintiff was given feedback and applied the critiques she received to improve her performance on each of the BST scenarios during the second week.

18. Similarly, on evening of Wednesday, December 3, 2008, Plaintiff responded to a domestic call for BST with Sgt. McClenan, who played the role of Plaintiff's partner. During the scenario, Plaintiff ultimately wrestled with Cpl. Miller, a female, who played the role of "the Aggressor" on the domestic call; Plaintiff employed her fake gun from her tool belt and shot the Aggressor. The scene was then over.

19. After that scenario, Plaintiff was directed to sit in the Instructor's Hooch with Sgt. Salen, Cpl. Stephen Burd, #1535, Cpl. Brian Fowble, #2688, Cpl. Miller, and Cpl. Miller's sister to receive feedback. Despite Cpl. Miller's praise for Plaintiff's technique during the domestic violence scenario, the CPI instructors lectured Plaintiff on her experience, criticized Plaintiff's performance, and sought her resignation. Plaintiff defended the praise she received, inquired why she was asked to perform successful scenarios over again during BST's second week, and responded that she had no intention of resigning and that she would continue to "get the job done," to the frustration of the aforementioned CPI Instructors.

20. On her last day of BST, Thursday, December 4, 2008, reserved as a Remedial day, Plaintiff and Student Officer Boone, Student Officer Brown, and Student Officer Singh were scheduled to perform Remedial scenarios. In the morning, the four student officers, including Plaintiff, reviewed two PowerPoint slide shows with Sgt. Salen and Cpl. Brian Fowble, #2688. The Instructors and student officers discussed areas in which they could improve before being sent on calls for the day.

21. As before, on Plaintiff's first call on December 4, 2008, Plaintiff was videotaped. Plaintiff's partner was Deputy Endlich, and the scenario involved responding to a

complaint of possible drug trafficking from two Signal 7s on a basketball court in the Summerfield complex. After Plaintiff completed the scenario and received feedback, a CPI Instructor asked whether Plaintiff would quit or continue with BST. Plaintiff responded that she intended to complete every call until the last minute and had no intention of quitting.

22. On Plaintiff's second BST call or scenario of the same day, Plaintiff and Student Officer Sandler Cohen were dispatched to the scene of a domestic call at 1151 Atlee Drive at approximately 12:15pm on December 4, 2008. Plaintiff's second and final BST scenario of the day on December 4, 2008 was not videotaped.

23. Lieutenant Darren Disque, #1848 told Plaintiff and Student Officer Cohen that Plaintiff would be the primary officer and that Student Officer Cohen was the secondary officer when they entered the scene. Cpl. Stephen Burd #1535 collected the student officers' BST books and the scenario began when they entered the home.

24. Upon entering the scenario, Plaintiff responded to the Aggressor, role played by Defendant Cpl. Michelle Qualls, #2664, a female, while Student Officer Cohen responded to the male complainant, role played by a male officer. Plaintiff proceeded to arrest Cpl. Qualls, which she, the Aggressor, resisted. The Aggressor and Plaintiff became engaged in a scuffle.

25. In response to the Aggressor's behavior, Plaintiff gave the Aggressor verbal commands, employed thrust-kick techniques to the Aggressor's chest, and used her tools, including imaginary O.C. spray and her ASP Baton to restrain the Aggressor, each to no avail.

26. In the meantime, the Aggressor, Cpl. Qualls, and Student Officer Springer, the Plaintiff, ended up off the mat in the hallway of the house's entrance. To her detriment, and upon information and belief, out of the ordinary practice and custom of BST scenarios,

Plaintiff's partner was "Blued" from the scene. Thus, her partner stood still with the unidentified male complainant of the scenario in the kitchen area of the house.

27. Immediately thereafter, Plaintiff removed her weapon, a fake gun constructed of red plastic, from its holster on her belt, and ordered the Aggressor, Cpl. Qualls to stand back and to not move. The Aggressor, however, continued to advance and replied "What? You gonna shoot me? You gonna shoot me?" as she approached the Plaintiff. The Aggressor, Cpl. Qualls, swung her fists toward Plaintiff and Plaintiff swung back with the gun in her hand.

28. Plaintiff hit Cpl. Qualls under the eye with the fake gun during the BST domestic scenario while defending herself against Cpl. Qualls's initial punch. Without warning, Cpl. Qualls walked away from the Plaintiff and into the kitchen of the house. Cpl. Qualls held her face and shouted obscenities. She immediately paced back toward the Plaintiff, simultaneously shouting obscenities at Plaintiff, so that Plaintiff discovered a welt under Cpl. Qualls's eye. Plaintiff immediately apologized to the Aggressor, Cpl. Qualls, and repeatedly stated "I'm sorry, ma'am, I'm sorry, ma'am."

29. Upon discovering Cpl. Qualls was hurt, Cpl. Burd shouted "Ok! Blue! Blue!," instructing the role-players, including Cpl. Qualls, and the primary officer, Plaintiff, to stop the activity and to end the scene. As part of the procedures of the Academy, when "Blue" is called, all participants to a scenario are directed to immediately cease role-playing and their related interactions with one another.

30. Contrary to Cpl. Burd's direct order and instruction to end the scenario, however, Defendant Cpl. Qualls immediately lunged at Plaintiff, taking Plaintiff by the head,

and repeatedly punched Plaintiff in the head directly over and near her temple with her fists. Plaintiff continued to apologize and crouched over to block her body from being hit.

31. Meanwhile, as Cpl. Qualls attacked and continued to beat Plaintiff on the head, Lt. Disque and Cpl. Burd stood still directly behind Cpl. Qualls, quietly observing Cpl. Qualls as she was cursing and beating on Plaintiff.

32. Cpl. Qualls, who was still holding Plaintiff by the head under her own arm, had total control of Plaintiff, who was now hunched over during the beating. Cpl. Qualls, with control over Plaintiff's body, directed Plaintiff from the kitchen area to the mat in the entry-way to the house, passing Lt. Disque and Cpl. Burd, neither of whom said nor did anything to stop the fight.

33. Cpl. Qualls then continued to smack and punch Plaintiff on Plaintiff's head, neck area, and back, shouting "Are you fucking crazy!" and "I could kill you!" and "Look at my face!," among other obscenities.

34. Plaintiff did not fight back against Cpl. Qualls out of fear of repercussions of assaulting an officer since the BST scenario was concluded.

35. Meanwhile, Lt. Disque, who was still inside the house where the BST scenario took place, periodically checked and/or typed into his mobile phone or Blackberry-type device; Cpl. Burd stood beside him in the kitchen of the house with his hands in his coat pockets. Plaintiff's partner for the scenario, Student Officer Sandler Cohen, stood by with the male role-player, also an officer, in the kitchen, observing as Cpl. Qualls continued to curse, punch, knee, and hit Plaintiff, Student Officer Vanessa Springer.

36. During the beating, Cpl. Qualls stepped away from Plaintiff and toward Lt. Disque and Cpl. Burd, exasperated by her own injury. She raised her voice, and then

immediately returned to beat Plaintiff, shouting the same obscenities along with "I could kill you" and "Sorry? Just look at my face!" and "Are you fucking crazy?" As the welt under her eye began to bleed, Cpl. Qualls used her knees and fists to continue to beat Plaintiff on Plaintiff's head in the corner of the room.

37. Finally, when Cpl. Qualls walked away from Plaintiff again, Plaintiff raised her voice in the direction of Instructors Lt. Disque and Cpl. Burd, asking "Are you gonna get her?" Upon Plaintiff's request, one or both of the Instructors, either Lt. Disque or Cpl. Burd, called to Cpl. Qualls, "Okay, that's it, Qualls!" The Instructors remained stationed as they were and reached out to grab Cpl. Qualls's arm.

38. Cpl. Qualls yanked her arm away from either of the Instructors on the Scenario, and she continued to shout at Plaintiff, both as she stood directly in front of Plaintiff and as she walked away from Plaintiff, "You are so fucking lucky you're a recruit!" and "I will beat you down!" and "I can't believe you!" and "Oh my gosh, Bitch, are you crazy? I could kill you!," among other threats and obscenities.

39. Once Cpl. Qualls was clear from the entry-way to the house, Plaintiff exited the house and attempted to return to the Hooch. On her way out, Plaintiff rushed away and walked a few feet down Atlee Drive toward the Student Officer Hooch. Lt. Disque called out to Plaintiff, raising his voice, and stated "Ms. Springer! I said stand by! Where are you going, huh? Are you just gonna quit? Get back over here and sit down!"

40. Plaintiff complied with Lt. Disque's order and sat down on the front steps of the house at 1151 Atlee Drive, directly behind Lt. Disque. Lt. Disque then referred to and/or typed into his mobile phone or Blackberry-type device for several moments.

41. Within moments, Defendant Cpl. Qualls, who was accompanied by the other male-role player, rushed out of the house, cursing and screaming at Plaintiff, who was still sitting on the front stairs of the house.

42. Defendant Cpl. Qualls shouted at Plaintiff, who sat so close to Cpl. Qualls as she exited the house that Plaintiff feared Cpl. Qualls would kick her in the back of the head or continue her violent tirade against Plaintiff.

43. Cpl. Qualls screamed, "You are so lucky!" and "You just don't know—I will kill you!" and "I will wipe you with the floor!" Among other threats and obscenities, Cpl. Qualls called Plaintiff "a little bitch." The Instructors on the BST scenario who ordered Ms. Springer to sit and wait outside the house, including Lt. Disque and Cpl. Burd, stood by and watched.

44. Soon afterward, Cpl. Fowble appeared from the Instructor's Hooch, located in the house next door to 1151 Atlee Drive. He retrieved Ms. Springer from the scene at 1151 Atlee Drive and told Plaintiff to leave her gun belt at the scene and walk with him to the Student Hooch. Plaintiff was disoriented from the assault and sat down a few feet away on the bench of a bus stop. Cpl. Fowble told Plaintiff, "Look this is what I need you to do for me, you hear me girl? You're gonna go to the hooch and get your things, and you're gonna head home, okay? Tomorrow morning at 0800 you're gonna report to CPI, turn in your things, and you're gonna resign, okay?"

45. Plaintiff was still stunned by the assault and the advice she was receiving; she was dizzy from the assault and did not respond. Cpl. Fowble continued, "You hear me, girl?," so Plaintiff replied, "I hear you!"

46. Plaintiff retrieved her belongings from the hooch and had another student call a friend to pick Plaintiff up. Along the way, Student Officer Robert Graham told Plaintiff that he heard Plaintiff screaming for help from inside 1151 Atlee Drive, but was told by his accompanying instructor not to go toward the house.

47. As Plaintiff walked toward the front of the Summerfield complex to wait for her ride, Sgt. McClenan approached Plaintiff. Approximately thirty-forty minutes passed from the beginning of the BST scenario until Plaintiff was excused from the premises of the assault, yet Sgt. McClenan stated he had already heard about the incident that occurred and asked Plaintiff what happened. Sgt. McClenan was the Sergeant in charge of the other BST group. He was not in charge of Plaintiff's BST group or Group A, which reported to Sgt. Salen. At no time did he or any CPI instructor check with Plaintiff about the status of her injuries or assist her with medical attention.

48. Plaintiff finally left the front of the Summerfield complex at approximately 1:15 P.M. on Thursday, December 4, 2008. Plaintiff first went to CPI to pick up medical paper-work forms and then went immediately to the hospital to have her head injuries checked.

49. Later the same day, Cpl. Larson, Plaintiff's coordinator, left a message for Plaintiff by voicemail informing her to "10-22" or cancel coming in the next day, Friday, December 5, 2008. He told her to instead, simply come in to CPI on Monday, December 8, 2008, with the rest of Plaintiff's class to report for a DUI class. In the meantime, Plaintiff took rest from her injuries.

50. As a student officer, Ms. Springer was frequently, regularly, and severely sexually harassed by CPI instructors and students from the first week, beginning on May 27,

2008, through well after the last day she was employed as a student officer in CPI (also “the academy”).

51. Ms. Springer was approached by instructors who would make slick and perverted comments to her. The situations she was forced to endure made her working environment even more stressful and uncomfortable than it should have already been as a police department recruit. Instructors not only made their vulgar comments and insinuations quietly and discretely, but also did so out in the open while in the close vicinity of other student officers and instructors. While harassment abounded throughout the academy among instructors and student officers alike, two CPI instructors in particular made the majority of sexually suggestive and demeaning comments to Ms. Springer while she was a student officer: Cpl. Brian Fowble and Sgt. Hank McClenan.

52. At all times mentioned herein, Ms. Springer refused and/or otherwise rebuffed these sexual advances.

53. Beginning in the first week, or about the time period of May 27, 2008 to May 30, 2008, often called "Hell Week,” both Cpl. Fowble and Sgt. McClenan made a barrage of sexually harassing comments to Ms. Springer. As Ms. Springer and her classmates were running for a CPI training exercise, both Sgt. McClenan and Cpl. Fowble called for Ms. Springer to come to them in front of all her classmates.

54. She ran and stood at attention in front of both instructors. Sgt. McClenan an Cpl. Fowble then purposefully began to carry on a conversation about Ms. Springer with the intent to humiliate and demean her. Cpl. Fowble asked Sgt. McClenan, "She's kinda cute, right?, and McClennan responded, "I guess, she's a’ight!" Cpl. Fowble then ordered Ms. Springer to run away; Ms. Springer complied. Immediately thereafter, Cpl. Fowble ordered

Ms. Springer to run back to them, and in the same instant the two instructors would continue the same conversation with each other, saying to each other that Ms. Springer would look better if she took off her makeup or that she looked “cute” or “a’ight,” all to Ms. Springer’s embarrassment and humiliation.

55. Throughout the running exercise, neither instructor called any male out of the exercise, nor purposefully demeaned any male student officer’s physical appearance with the suggestion that his appearance bore any weight on his chance of success in the academy. Ms. Springer could not complain, even to any white-shirt in her chain of command because she feared retaliation during the academy and knew that she would be prevented from completing the rest of the courses at CPI by CPI authorities for reporting sexual harassment from her higher-ranked instructors. It was for this reason that CPI instructors continued to abuse their authority over student officers like Ms. Springer; any complaint against an instructor’s behavior would have been reason enough to dismiss her from Session 114.

56. Throughout the academy, instructors would harass Ms. Springer by repeatedly remarking on Ms. Springer’s physical appearance. Specifically, at the graduation of the previous CPI class, Session 113, on or around August 2008, Sgt. Diane Salen, a sergeant for Session 114, asked Ms. Springer’s classmates, "Where's Springer?" when she could not find her. Sgt. Salen continued, "She better not be putting on makeup, find her!" Sgt. Salen’s remarks set the stage for CPI instructors to use the claim that Ms. Springer was late or wasting time by using make up, against Ms. Springer throughout the duration of her training.

57. Additionally, one day on or around September 2008 during CPI, while Ms. Springer was in the student break and lunch area, Cpl. Fowble said to her, "Springer, you look like the type who wears them long fake nails!" Ms. Springer replied that she did not wear fake

nails and kept them short. In response to this rebuff from Ms. Springer, Cpl. Fowble then persisted to make comments on how much she liked getting her long fake nails done. Despite these remarks about Ms. Springer's physical appearance, all of which were fabricated and untrue, no instructor ever suggested from any male student officer's physical appearance that he was late, absent, or otherwise not suitable for employment in the Police Department.

58. Typical of the sexual harassment Ms. Springer was subjected to by Sgt. McClenan and Cpl. Fowble was the constant suggestion by either or both of them to her that she was romantically interested in either or both of them, each an instructor in a position of authority over Student Officer Springer. The remarks, though untrue, were made in front of other classmates at times and humiliated and embarrassed Ms. Springer.

59. For example, within the first month of the academy, on or around June 2008, Ms. Springer and her classmates were completing leg-lift exercises. While doing class exercises in which Student Officers had to lift their legs up to a certain number of inches, 30, 60, or 90 inches, Sgt. McClenan planted his body directly in front of Student Officer Springer to conduct a conversation. She was on her back with her legs in the air at "90 inches" and her rear in his direction. Sgt. McClenan stood in front of Ms. Springer in a position that was sexually suggestive, despite its impropriety.

60. Sgt. McClenan did not stand directly in front of any male student officer during leg-lift exercises, nor did he make the suggestion to any male student officers that he was romantically or otherwise involved with any of them, or attribute their ability to complete an exercise to his alleged sexual involvement with any other male officer.

61. In another example of Sgt. McClenan's continuous and rampant sexual harassment of Ms. Springer, at least once a week, if not every time Student Officer Springer

saw Sgt. McClenan at CPI and during the entire duration of time Student Officer Springer was employed at CPI, Sgt. McClenan would tell her “Just wait till graduation, kid, hold your horses!" His comments suggested that Ms. Springer ought to wait until after graduation from the academy to become romantically involved with him.

62. Similarly, on or around the end of the summer 2008 and at least once in front of two different student officers, one who graduated in Session 113, and one who was Ms. Springer’s classmate in Session 114, Ms. Springer was walking in the hallway by herself. Sgt. McClenan would stop her and he would tell her, "You know you’re ditsy, right?" Sgt. McClenan then ordered Student Officer Springer to do pushups, which were typical training exercises. However, once she finished and stood at attention before retreating back to class, Sgt. McClenan always said to Student Officer Springer, “Just wait till graduation, kid, hold your horses!” Sgt. McClenan's comments always suggested that she, rather than he, wait until after graduation to become involved with him romantically. He never suggested to another male employee of the department that he was stupid or “ditsy” because of his gender, nor did he suggest any male student was attracted to him romantically.

63. On yet another occasion on or around August or September 2008, Ms. Springer was running to get something out of a fellow classmate’s car. She was stopped by Sgt. McClenan who said, "Hey kid! Just hold your horses, Ok?” and followed with "You young ones, like the chase don't you?" Stunned by his lewd remarks, Ms. Springer stared blankly back at him and awaited Sgt. McClenan’s order for her to carry on. Sgt. McClenan never made the same remark to any male employees which suggested or stated sexual advances to him or any other employee of the Department during his employment. Sgt. McClenan never made the same remark to another male that suggested any young male student officer’s

chance to succeed in the academy was dependent on becoming intimately and romantically involved with a supervisor.

64. On or around September 2008, soon after Cpl. Fowble's remarks to Student Officer Springer regarding her nails, she finished her last driving course in the Field Events portion of her training. When she had completed one of the courses, Cpl. Fowble exclaimed, "That's what I'm taking about! That's my bitch!" Though humiliated by his remarks and uncomfortable, Ms. Springer did not reply to his comments; she did not want to suffer retaliation or be told that she could not complete the rest of the course.

65. Ms. Springer's beliefs were well-founded, as students who did not complete the driving course or other segments of CPI training were "recycled" or left back and were forced to start the entire academy all over again with the next incoming class. This was true of Student Officer Shell.

66. Cpl. Fowble's remarks to Ms. Springer were degrading and unbridled. Cpl. Fowble never used derogatory language to suggest any male student officer was incapable of driving before completing the course, or to suggest his dominance and control over another by calling another a degrading and insulting name.

67. Continuously and throughout the entirety of Session 114 when Ms. Springer was a student officer, Sgt. McClenan, even though not assigned to Ms. Springer's class, would parade into Ms. Springer's classroom to "hang out" in the back while a class was ongoing. Regularly, Sgt. McClenan would walk past Ms. Springer's desk, and in front of all her classmates, say "Just wait your turn ok? After graduation" and then wink his eye. Ms. Springer did not wish to be nor was she ever in a relationship with any classmate or instructor at CPI.

68. Sgt. McClenan would make the same remark every time Ms. Springer would look at him. By roaming the classroom full of Ms. Springer's colleagues, Sgt. McClenan never "turned down" any other male student's alleged and non-existent romantic interest in him for the purpose of humiliating, insulting, and dominating the male student.

69. On or around the fall of 2008 during the academy in September, October, or November, Ms. Springer was ordered to stand in front of Cpl. Larson's office to receive a lecture for not paying voluntary class dues. While standing at the front of the door of Cpl. Larson's office waiting for him to arrive, Cpl. Fowble passed Ms. Springer and said, "What you looking at Springer? You know you want this!" Cpl. Fowble winked and kept walking. Cpl. Fowble's remarks, too, suggested that Ms. Springer was romantically interested in him. Ms. Springer ignored his comments and turned her head away from his direction because she was afraid that by showing her reaction, she would be retaliated against for insubordination of an instruction of higher rank. Cpl. Fowble never suggested that another male student officer was romantically interested in him to the embarrassment and humiliation of the student.

70. Moreover, six months into the nearly eight-month long academy, both Cpl. Fowble and Sgt. McClenan's sexually harassing conduct with women was blatant and obvious to everyone in the academy. In addition to both instructors' habit of winking their eye and asserting a smart, rude, and sexually suggestive comment under their breath to the few female student officers in Session 114, Cpl. Fowble would repeatedly ask females about their current relationship status, even if he knew the answer.

71. Cpl. Fowble repeatedly flirted with female classmates of Ms. Springer's while winking his eye at them. In particular, on one occasion in early November 2008, Ms. Springer accompanied Student Officer ("S/O") Jacobs, a black female, as required when she visited

Cpl. Fowble's office by his request. Cpl. Fowble spoke to S/O Jacobs about what kind of car she drove. He then started talking about how good she probably looked in her BMW, how she's "lucky" he didn't see her outside of the academy, and how he wished she wasn't married. His comments to S/O Jacobs made clear that he was hitting on her and that he was romantically interested in her based solely on her gender. Overhearing Cpl. Fowble's remarks made Ms. Springer uncomfortable and feel disrespected. Cpl. Fowble never called male students into his office to discuss their marital status with him, much less to endure overt sexual harassment.

72. Continuously and throughout the entirety of Session 114 when Ms. Springer was a student officer, Sgt. McClenan would make frequent trips to Ms. Springer's particular class, though he was not Ms. Springer's class' assigned Sergeant. Although Sgt. McClenan frequently made passes and was hitting on many of the few female students in the academy during Session 114, Sgt. McClenan would visit a particular female classmate, Student Officer Shell, and would whisper into her ear. Student Officer Shell would frequently respond with a smirk or quiet laugh.

73. When Sgt. McClenan was not entering the class to see Student Officer Shell, he would call her out to his office. It was clear to everyone in the academy that Student Officer Shell received special treatment for acquiescing to Sgt. McClenan's suggestive remarks, cat calls and other harassing conduct.

74. As a recycle from Session 113, Student Officer Shell was well known to instructors from the first day of the academy in Session 114, and her special treatment was accepted by other instructors. For example, S/O Shell neglected to perform punishment exercises even when the whole class was required to do them. Instead, S/O Shell stood inside

the CPI academy in the air conditioning. No other student officer received favorable treatment from instructors during the academy; to the contrary the environment at the academy was physically challenging for Student Officers.

75. On the other hand, as one of the few women in CPI Session 114, and for failing to submit to or respond in an agreeable manner to Sgt. McClenan's, Cpl. Fowble's and other classmates' and instructors' aggressive conduct and for plainly rejecting her instructors' passes on her, Student Officer Springer, the Plaintiff, was continuously sexually harassed and set up to fail exercises that others easily passed with the same performance.

76. In reprisal for Ms. Springer's refusals of the unwelcome sexual harassment, Sgt. McClenan's and Cpl. Fowble spearheaded the movement against Ms. Springer, including name-calling by other students and instructors; repeated calls for Ms. Springer's resignation; and Ms. Springer's assault by Cpl. Qualls on December 4, 2008, orders to resign, and eventual termination from the academy.

77. As an example of the sexual harassment Ms. Springer endured as a Student Officer by other CPI Instructors, Student Officers and recent graduates, Ms. Springer endured many instances of insults, name-calling and sexual harassment by her classmates, all to her humiliation and embarrassment, despite repeated attempts to curtail them. In retaliation for repeatedly defending herself from demeaning, stereotypical remarks, and clarifying that she had no interest in becoming romantically involved with a certain male classmate in the face of his aggressive sexual comments toward her, classmates and instructors alike labeled Ms. Springer "crazy," off the cuff," "ghetto," and "a tease."

78. In particular, Cpl. Larson called Ms. Springer "ghetto" in or around September 2008 when Ms. Springer completed her last driving course since Ms. Springer did not

previously have a driver's license. Other student officers began calling her this and other demeaning and insulting names as well. As a result of rebuffing the sexual advances of Student Officer Chandler, a recent or imminent graduate of Session 113, and therefore of higher rank than Ms. Springer, he continued to call her "a tease."

79. For example, on or around July 2008 and during CPI, Student Officer Springer was sitting in the back seat of a car with other students while they ate lunch. Student Officer Chandler, a recent or imminent graduate of Session 113, walked by the car, leaned into the car window, and said to Student Officer Springer, "These uniform pants are too small for my dick to be getting so hard."

80. After Ms. Springer repeatedly conveyed to him that she was not interested in a relationship with him and that she would not give him her phone number, Student Officer Chandler obtained her number and called her anyway while she was at the shooting range. As a result of S/O Chandler's perverted conduct, Ms. Springer felt humiliated and embarrassed.

81. Similarly, Ms. Springer was subject to sexual harassment by other student officers when frequently and throughout the duration of CPI, in the lunch area, student officers would remark that she had a flat behind. At the same time, Student Officer Lane would frequently try to talk to Ms. Springer because he had a romantic interest in her. Ms. Springer would rebuff these sexual advances by saying "I am not interested" three to four different times.

82. For refusing to submit to or respond in any manner to Sgt. McClenan's, Cpl. Fowble's, and other Instructors' and Student Officers' sexually harassing and aggressive conduct, and for plainly rejecting these instructors' and student officers' lewd passes on her, Student Officer Springer was continuously sexually harassed, and set up to fail exercises that

others easily passed with the same or worse performance. In reprisal for Ms. Springer's refusals of the unwelcome sexual harassment, Sgt. McClenan, Cpl. Fowble, and other CPI Instructors, led the instructors' dislike for Ms. Springer by perpetuating the culture of sexual harassment at CPI, as well as repeatedly calling for Ms. Springer's resignation by CPI officials, and eventually condoning the assault of Ms. Springer on December 4, 2008, ordering her to resign, and terminating her from the academy.

83. On the morning of Monday, December 8, 2008, Plaintiff arrived at CPI, as ordered by Cpl. Larson, for DUI training. While waiting, it appeared that no class or DUI training was taking place or was scheduled to take place.

84. On December 8, 2008, Ms. Springer telephoned Internal Affairs from the CPI front desk's phone to file a complaint arising from her disparate treatment throughout her training at CPI, BST, and in particular, a complaint stemming from Cpl. Qualls's misconduct after the BST scenario ended on December 4, 2008.

85. Plaintiff spoke with Sgt. Danon Ashton of Internal Affairs and informed him she was filing a complaint. Upon information and belief, Internal Affairs has a practice and policy of maintaining confidentiality of an internal complaint, as where an employee of the department files a complaint against another employee of the department.

86. In direct contravention of this policy, and as Ms. Springer began to note her disparate treatment, Sgt. Ashton told Plaintiff that he would call Sgt. McClenan and call her back before filing any complaint. He asked for her cell phone number and ended the call. Immediately after hanging up, Sgt. Ashton then called the CPI front desk to speak with Sgt. McClenan. Plaintiff, who had called Internal Affairs from the CPI front desk, answered the phone, as was customary since the individual who normally answers the phone was at lunch.

87. Plaintiff Springer recognized Sgt. Ashton's voice and he asked to be put through to Sgt. McClenan. Ms. Springer directed the call, though Sgt. Ashton did not know Ms. Springer had answered the phone. Upon information and belief, Sgt. Ashton discussed Ms. Springer's intention to file a complaint against CPI instructors with Sgt. McClenan, who, having already spoken with Ms. Springer afterward, and upon information and belief, with other CPI instructors during the incident on December 4, 2008, was well aware of Plaintiff's assault on the previous Thursday, December 4, 2008. Upon information and belief, Sgt. McClenan was informed of Plaintiff's assault at BST through a series of text or email messages sent and received on his mobile phone or Blackberry from Lt. Disque, Cpl. Burd, and other CPI Instructors involved in, conducting, supervising, or aware of the BST scenario at 1151 Atlee Drive on December 4, 2008.

88. Sgt. Ashton called Plaintiff back on her cell phone on Monday, December 8, 2008, within a few minutes. Plaintiff insisted that she was prepared for an interview at the Internal Affairs office and could come in that same day to file her complaint. Instead, Sgt. Ashton, aware that Plaintiff wished to make a complaint about her disparate treatment and about Cpl. Qualls's assault after the BST scenario, refused to allow Ms. Springer to file her complaint that same day in person. Sgt. Ashton informed Ms. Springer to make a written complaint and to mail it to the Clinton, MD office. Upon information and belief, Sgt. Ashton was advised or did advise during his conversation with Sgt. McClenan as to the Department's dislike for Plaintiff and the Department's agenda to coerce Plaintiff to leave or be terminated. Ultimately, Sgt. Ashton purposefully denied Ms. Springer from filing her complaint immediately to delay her from seeking administrative remedy before CPI Instructors coerced her to resign or be terminated.

89. Plaintiff was precluded from filing any complaint with Internal Affairs while still actively employed by the Department when Sgt. Ashton refused to interview her.

90. As Ms. Springer waited at CPI for further orders from any of her instructors, Lt. Disque and Sgt. Salen repeatedly approached and harassed her about resigning. They asked Ms. Springer several times to draft her resignation without reason. They provided her with sample resignation letters, materials to write the resignation letter, and asked if she needed help writing her resignation letter.

91. Later the same day, on Monday, December 8, 2008, while Student Officer Springer was still waiting for the DUI class which her coordinator Cpl. Larson asked her to attend, but which was actually not occurring, Plaintiff was instead sent to meet with Sgt. Salen, Lt. Disque, and Captain Yuen, who Plaintiff met with in a room with Cpl. Fowble and Sgt. McClenan.

92. During this meeting, Sgt. Salen, Lt. Disque, and Capain Yuen, without any actionable reason, asked for Plaintiff's resignation. No member of the meeting made any mention of Cpl. Qualls's assault of Plaintiff on December 4, 2008, let alone the orders Plaintiff received to go home, and not to return until Monday.

93. Plaintiff received from Captain Yuen 24 hours to make her decision about resigning. Plaintiff decided not to resign because of Cpl. Qualls's assault on her since she performed satisfactorily at the academy.

94. One day later, on December 9, 2008, and before Plaintiffs' Internal Affairs complaint could have been received by the Department, Plaintiff conveyed her decision to Lt. Disque and Major Sesker. As a result of Plaintiff's decision not to resign, Major Sesker

informed Plaintiff she would be terminated from employment with the Prince George's County Police Department.

95. The Prince George's County Police Department had no actionable cause to terminate Plaintiff, particularly because she attempted and ultimately did file a complaint about her assault by Cpl. Qualls after the completion of a BST scenario.

96. The Department, had no actionable cause to terminate Plaintiff during BST and for that reason sought Plaintiff's resignation on multiple occasions throughout BST. Finally, CPI Instructors for the Department purposefully and willfully set up a BST scenario for Plaintiff to be assaulted on her final day of Remedial BST scenarios and instructed Plaintiff to leave the Summerfield complex immediately so that she would not be able to complete the rest of training for BST and would fail.

97. Plaintiff filed her Complaint Against Police Practices on December 9, 2008.

98. On December 9, 2008, as a result of refusing to resign without cause, Plaintiff received a letter notifying her that she was placed on Administrative Leave immediately. The letter stated in part, "This action has been taken pending a decision forth coming by the chief to terminate your employment with this agency." The letter was signed by Everett L. Sesker, # 1875, Commander of the Community Policing Institute.

99. When she received the letter placing her on administrative leave, Ms. Springer was told by Lt. Disque that her termination was a practical certainty since the Chief of Police would sign the forms without even looking at them.

100. At no time during the entire process was Ms. Springer permitted an opportunity to speak with Cpt. Yuen or Maj. Sesker alone since Lt. Disque was always present with her and Lt. Disque's presence intimidated Ms. Springer from reporting

misconduct by Lt. Disque, including his failure to interfere and prevent her assault by Cpl. Qualls on Thursday, December 4, 2008, to his senior officials.

101. In a letter dated December 23, 2008, Plaintiff received notice of termination from employment with Prince George's County Police Department effective December 26, 2008, from Acting Chief of Police Roberto L. Hylton.

102. Even after Ms. Springer's assault, however, the sexual harassment did not stop. Sgt. McClenan continued his barrage of rude, explicit, and demeaning comments suggesting that Ms. Springer and he were romantically involved.

103. On December 9, 2008, the same day Major Sesker placed Ms. Springer on administrative leave for her refusal to resign, Ms. Springer walked down the hallway toward the front desk, and behind her she heard Sgt. McClenan say to her, "Hmm, Hmm, Hmm!," as he watched her backside. When she appeared at the front desk waiting for her leave paperwork to be prepared, Sgt. McClenan again approached her and among other things said, "You look expensive, you might cost me some serious money! But that's ok, I'm willing to invest." He continued, "You look like you like expensive things, like you're very materialistic." Again, Ms. Springer, embarrassed, ignored his advance and remained silent regarding his characterization of her on the basis of her gender. Sgt. McClenan then told her that he would call to check up on her since she was leaving, and before leaving himself, suggestively offered his number to Ms. Springer in the event she "needed anything."

104. Unfortunately for Ms. Springer, after several weeks passed, she did end up needing something: her last and final paycheck from the Department. Ms. Springer was terminated from the Department on December 26, 2008. After she did not receive her final pay and was unable to reach anyone at the Department during the holidays regarding her pay,

in her last effort to reach a point of contact at the academy after she was terminated, she reluctantly called Sgt. McClenan about the whereabouts of her last pay check, after she did not receive it.

105. In spite of all that Ms. Springer suffered throughout the academy, she was subjected to Sgt. McClenan's sexual harassment one last time in her last attempt to collect the a long-overdue paycheck from the Department, even after she had already been terminated. When she called Sgt. McClenan regarding her pay, he suggestively stated, "Springer, I didn't think you would call!," implying that Ms. Springer was calling him for an illicit reason along the lines of his passes on her during her training at the academy.

106. `Since her termination from the Prince George's County Police Department, Ms. Springer spoke on occasion with Cpl. Thompson, who confirmed that the perverted behavior was typical of Department practice for CPI. He stated that the sexual harassment, assault, and relentless pressure for someone like Ms. Springer to resign from the academy, followed by her termination did not surprise him, as it was a pattern. Cpl. Thompson stated to Ms. Springer that that she could have avoided her situation if she had "gone with the flow" and "put out." As a former Basic Survival Training instructor for CPI himself, Cpl. Thompson noted that Ms. Springer's refusal to become an instructor's "jump-off" coincided with her fate being similar to many past female student officers at the Prince George's County Community Policing Institute. Thus, the recurring pattern of behavior of the students and instructors named above and of the Community Policing Institute's instructors created an environment where it was impossible for Ms. Springer to receive the training she required to become a member of the Prince George's Police Department in a professional manner.

107. On March 18, 2009 the Plaintiff satisfied the notice provisions of Md. Code Cts & Jud. Proc. §5-304.

COUNT I

Assault—Defendant Qualls

108. Plaintiff adopts and incorporates by reference each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

109. On December 4, 2008, Plaintiff, a Student Officer in Prince George's County CPI, was dispatched by an Instructor to respond to a domestic call at 1151 Atlee Drive as part of a Remedial BST scenario.

110. Plaintiff arrived at the scene with Student Officer Cohen; she was informed that she would play the role of the Primary Officer and Cohen would play the secondary officer for the scenario.

111. When Plaintiff entered the home, she identified the Aggressor as the large, black female in the room and proceeded to arrest her. The Aggressor was role-played by Cpl. Michelle C. Qualls. Meanwhile, Student Officer Cohen responded to the Complainant for the scenario, played by an unidentified, heavy-set white male officer.

112. As Plaintiff proceeded to arrest the Aggressor, Cpl. Qualls, the Aggressor resisted and she and Plaintiff became engaged in a scuffle.

113. In response to the Aggressor's behavior, Plaintiff gave the Aggressor verbal commands to stand back, employed thrust-kick techniques to the Aggressor's chest, and used her tools, including imaginary O.C. spray and her ASP Baton in order to restrain the Aggressor, each to no avail.

114. Immediately thereafter, as the BST scenario continued, Plaintiff removed her weapon, a fake gun constructed of red plastic, from its holster, and ordered the Aggressor,

Cpl. Qualls to stand back and to not move. The Aggressor, however, continued to advance and replied “What? You gonna shoot me? You gonna shoot me?” as she approached the Plaintiff. The Aggressor, Cpl. Qualls, swung her fists toward Plaintiff and Plaintiff swung back with the gun in her hand.

115. Plaintiff hit Cpl. Qualls under the eye with the fake gun—during the BST domestic scenario—while defending herself against Cpl. Qualls’s initial punch. Without warning, Cpl. Qualls walked away from the Plaintiff and into the kitchen of the house. Cpl. Qualls held her face and shouted obscenities at the Plaintiff. She immediately paced back toward the Plaintiff, simultaneously shouting obscenities at Plaintiff, so that Plaintiff discovered a welt under Cpl. Qualls’s eye. Plaintiff immediately apologized to the Aggressor, Cpl. Qualls, and repeatedly stated “I’m sorry, ma’am, I’m sorry, ma’am.”

116. Upon discovering Cpl. Qualls was hurt, Cpl. Burd shouted “Ok! Blue! Blue!,” instructing the role-players, including Cpl. Qualls, and the primary officer, Plaintiff, to stop the activity, and ordering the end of the BST scenario. Academy policy instructs that when “Blue!” is called in training, trainees, instructors, role-players, and students understand they must cease their activity.

117. Contrary to Cpl. Burd’s instruction to end the scenario, however, Defendant Cpl. Qualls immediately lunged at Plaintiff, taking Plaintiff by the head, and repeatedly punched Plaintiff in the head directly over and near her temple with her fists. Plaintiff continued to apologize and crouched over to block her body from being hit as Cpl. Qualls cursed and shouted at Plaintiff after the end of the BST Scenario.

118. Cpl. Qualls, who was still holding Plaintiff by the head under her own arm, had total control of Plaintiff, who was now hunched over.

119. Cpl. Qualls then continued to smack and punch Plaintiff on Plaintiff's head, neck area, and back, shouting "Are you fucking crazy!" and "I could kill you!" and "Look at my face!," among other threats and obscenities.

120. Plaintiff did not fight back against Cpl. Qualls. She feared the repercussions of assaulting an officer after the BST scenario had clearly concluded.

121. Meanwhile, Cpl. Qualls continued to curse, punch, knee, and hit Plaintiff, Student Officer Vanessa Springer.

122. During the beating, Cpl. Qualls stepped away from Plaintiff and toward Lt. Disque and Cpl. Burd, exasperated by her own injury. She raised her voice, and then immediately returned to beat Plaintiff, shouting the same obscenities along with "I could kill you" and "Sorry? Just look at my face!" and "Are you fucking crazy?" As the welt under her eye began to bleed, Cpl. Qualls used her knees and fists to continue to beat Plaintiff on Plaintiff's head in the corner of the room.

123. Finally, when Cpl. Qualls walked away from Plaintiff again, Plaintiff raised her voice in the direction of Instructors Lt. Disque and Cpl. Burd, asking "Are you gonna get her?" Upon Plaintiff's request, one or both of the Instructors, either Lt. Disque or Cpl. Burd, called to Cpl. Qualls, "Okay, that's it, Qualls!" The Instructors remained stationed as they were and reached out to grab Cpl. Qualls's arm.

124. Cpl. Qualls yanked her arm away from either of the Instructors on the Scenario, and she continued to shout at Plaintiff, both as she stood directly in front of Plaintiff and as she walked away from Plaintiff, "You are so fucking lucky you're a recruit!" and "I will beat you down!" and "I can't believe you!" and "Oh my gosh, Bitch, are you crazy? I could kill you!," among other threats and obscenities.

125. Once Cpl. Qualls was clear from the entry-way to the house, Plaintiff exited the house and attempted to return to the Hooch.

126. However, Lt. Disque ordered Plaintiff to sit down on the front steps of the house at 1151 Atlee Drive, directly behind Lt. Disque. Plaintiff complied with Lt. Disque's instructions.

127. Within moments, Defendant Cpl. Qualls, rushed out of the house, cursing and screaming at Plaintiff, who was still sitting on the front stairs of the house.

128. Defendant Cpl. Qualls screamed at Plaintiff, who sat so close to Cpl. Qualls as she exited the house that Plaintiff feared Cpl. Qualls would kick her in the back of the head or continue her violent tirade against Plaintiff.

129. Cpl. Qualls screamed, "You are so lucky!" and "You just don't know—I will kill you!" and "I will wipe you with the floor!" Among other threats and obscenities, Cpl. Qualls called Plaintiff "a little bitch." The Instructors on the BST scenario, including Lt. Disque and Cpl. Burd stood by and watched with their hands in their pockets or sending and reviewing messages on their Blackberry-type devices.

130. Defendant Cpl. Qualls acted with the intent and capability to do bodily harm to Plaintiff Springer. Defendant Qualls's conduct was perpetrated with actual malice.

131. Defendant Qualls's actions caused Plaintiff to be put in reasonable apprehension of an imminent battery.

132. As a result of Defendant Qualls's conduct and actions, Plaintiff has suffered and will continue to suffer severe mental anguish, medical and other related expenses, and loss of income.

WHEREFORE, Plaintiff Vanessa Springer demands judgment against Defendant Michelle Qualls in an amount to be determined at trial but not less than FIVE MILLION DOLLARS ($ 5,000,000.00), plus interest, costs, attorney's fees, and punitive damages in an amount to be determined at trial.

COUNT II

Battery—Defendant Qualls

133. Plaintiff adopts and incorporates by reference each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

134. Plaintiff hit Cpl. Qualls, who was role-playing as the Aggressor during a BST Scenario, under the eye with the fake gun during the BST domestic scenario while defending herself against Cpl. Qualls's initial punch. Without warning, Cpl. Qualls walked away from the Plaintiff and into the kitchen of the house. Cpl. Qualls held her face and shouted obscenities. She immediately paced back toward the Plaintiff, simultaneously shouting obscenities at Plaintiff, so that Plaintiff discovered a welt under Cpl. Qualls's eye. Plaintiff immediately apologized to the Aggressor, Cpl. Qualls, and repeatedly stated "I'm sorry, ma'am, I'm sorry, ma'am."

135. Upon discovering Cp. Qualls was hurt, Cpl. Burd shouted "Ok! Blue! Blue!," instructing the role-players, including Cpl. Qualls, and the primary officer, Plaintiff, to stop the activity, and ordering an end to the BST Scenario.

136. Over Cpl. Burd's instruction to end the scenario, however, Defendant Cpl. Qualls immediately lunged at Plaintiff, taking Plaintiff by the head, and repeatedly punched Plaintiff in the head directly over and near her temple with her closed fists. Plaintiff continued to apologize and crouched over to block her body from being hit.

137. Cpl. Qualls, who was still holding Plaintiff by the head under her own arm, had total control of Plaintiff, who was now hunched over during the beating. Cpl. Qualls, with control over Plaintiff's body, directed Plaintiff from the kitchen area to the mat in the entry-way to the house, passing Lt. Disque and Cpl. Burd, neither of whom said nor did anything to stop the fight or prevent further injury to the Plaintiff.

138. Cpl. Qualls then continued to smack and punch Plaintiff on Plaintiff's head, neck area, and back, shouting "Are you fucking crazy!" and "I could kill you!" and "Look at my face!," among other obscenities.

139. Plaintiff did not fight back against Cpl. Qualls out of fear of repercussions of assaulting an officer, Cpl. Qualls, since the BST scenario was clear called to an end when Cpl. Burd called "Blue!"

140. Meanwhile, Lt. Disque, who was still inside the house where the BST scenario took place, periodically checked and/or typed into his mobile phone or Blackberry-type device; Cpl. Burd stood beside him in the kitchen of the house with his hands in his coat pockets. Plaintiff's partner for the scenario, Student Officer Sandler Cohen, stood by with the unidentified male role-player, also an officer, in the kitchen, observing as Cpl. Qualls continued to curse, punch, knee, and hit Plaintiff, Student Officer Vanessa Springer.

141. During the beating, Cpl. Qualls stepped away from Plaintiff and toward Lt. Disque and Cpl. Burd, exasperated by her own injury. She raised her voice, and then immediately returned to beat Plaintiff, shouting the same obscenities along with "I could kill you!" and "Sorry? Just look at my face!" and "Are you fucking crazy?" As the welt under her eye began to bleed, Cpl. Qualls used her knees and fists to continue to beat Plaintiff on

Plaintiff's head in the corner of the room. Defendant Cpl. Qualls repeated this behavior several times.

142. Finally, when Cpl. Qualls walked away from Plaintiff again, Plaintiff raised her voice in the direction of Instructors Lt. Disque and Cpl. Burd, asking "Are you gonna get her?" Upon Plaintiff's request, one or both of the Instructors, either Lt. Disque or Cpl. Burd, called to Cpl. Qualls, "Okay, that's it, Qualls!" The Instructors remained stationed as they were and reached out to grab Cpl. Qualls's arm.

143. Cpl. Qualls yanked her arm away from either of the Instructors on the Scenario, and she continued to shout at Plaintiff, both as she stood directly in front of Plaintiff and as she walked away from Plaintiff, "You are so fucking lucky you're a recruit!" and "I will beat you down!" and "I can't believe you!" and "Oh my gosh, Bitch, are you crazy? I could kill you!," among other threats and obscenities.

144. Once Cpl. Qualls was clear from the entry-way to the house, Plaintiff exited the house and attempted to return to the Hooch. On her way out, Plaintiff rushed away and walked a few feet down Atlee Drive toward the Student Officer Hooch. Plaintiff then complied with Lt. Disque's order and sat down on the front steps of the house at 1151 Atlee Drive, directly behind Lt. Disque.

145. Defendant Qualls's conduct constituted an intentional touching of Plaintiff Springer by Defendant Qualls, and was undertaken deliberately and with actual malice.

146. As a result of Defendant Qualls's conduct, Plaintiff Springer suffered substantial damages, including, but not limited to, extreme and permanent pain and suffering, permanent and debilitating injury to her head, back, neck and vision including permanent light sensitivity, as well as humiliation, mental distress, and monetary losses.

WHEREFORE, Plaintiff Vanessa Springer demands judgment against Defendant Michelle Qualls in an amount to be determined at trial but not less than FIVE MILLION DOLLARS ($ 5,000,000.00), plus interest, costs, attorney's fees, and punitive damages in an amount to be determined at trial.

COUNT III

Intentional Infliction of Emotional Distress—Defendant Qualls

147. Plaintiff adopts and incorporates by reference each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

148. When Plaintiff accidentally struck Defendant Qualls with her weapon during the training exercise and in self defense against Defendant Qualls's initial punch, Plaintiff immediately apologized to the Defendant, even though the Defendant was a playing the Role of the Aggressor in a domestic violence police training scenario.

149. The purpose of the exercise at 1151 Atlee Drive was for Plaintiff to demonstrate her knowledge and skill in responding to scenarios mimicking real-life police response scenarios.

150. The moment CPI Instructors realized Defendant Qualls was potentially injured due to Plaintiff having stricken her under the eye during the training, the Order to Stop the Training program by calling "Blue!" was directed at both Plaintiff and Defendant Qualls in the scene.

151. The moment "Blue" was called was the moment the Training Scenario ended and Plaintiff and Defendant were no longer reasonably expected to assume the risk of or contribute to injury at 1151 Atlee Drive.

152. Instead of stopping the training and attending to her own injury, Defendant Qualls unreasonably overreacted by maliciously and mightily attacking Plaintiff with repeated blows to the head, using her closed fists, arms, and knees to deliver the most serious and severe injury to Plaintiff in retaliation for Plaintiff's error.

153. Defendant Qualls' conduct was intentional, reckless, and in deliberate disregard of a high degree of probability that emotional distress would result to the defenseless Plaintiff.

154. The aforesaid conduct by Defendant's agents was extreme and outrageous and beyond the bounds of decency in society.

155. The conduct of Defendant's agents was intentional and undertaken with malicious and ill-will.

156. As a result of the aforesaid conduct and actions, Plaintiff has suffered, and will continue to suffer, severe and extreme emotional distress.

WHEREFORE, Plaintiff Vanessa Springer demands judgment against Defendant Michelle Qualls in an amount to be determined at trial but not less than FIVE MILLION DOLLARS ($ 5,000,000.00), plus interest, costs, attorney's fees, and punitive damages in an amount to be determined at trial.

COUNT IV

Violation of Article 24 of the Maryland Declaration of Rights – Excessive Force
All Defendants

157. Plaintiff adopts and incorporates by reference each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

158. By the actions detailed above, Defendant Qualls and other CPI Instructors deprived the Plaintiff of her rights under Article 24 of the Maryland Declaration of Rights, including but not limited to excessive force and brutality.

159. Defendant Qualls, at all relevant times hereto, acted under color of State law and in a manner that was not objectively reasonable, by intentionally assaulting and battering Plaintiff, a Student Officer, after the BST domestic violence training scenario was explicitly over.

160. Defendant Prince George's County Police Department, by and through its agents, employees, or servants including but not limited to the unidentified male role-player, Lt. Disque and Cpl. Burd, acted under color of State law and in a manner that was not objectively reasonable, by tacitly condoning, observing, and failing to interfere or prevent Defendant Qualls' intentional assault and battery of Plaintiff, Student Officer Springer, after the BST domestic violence scenario was called to an end.

161. When "Blue!" was called, Cpl. Burd gave a deliberate instruction to cease all scenario-related activity, including any physical contact among students and role-players in the training.

162. When "Blue!" was called, Defendant Qualls was deliberately indifferent to the instruction and proceeded to beat Ms. Springer over the head, neck, shoulders, and back repeatedly, using her hands, fists, and knees to purposefully inflict pain and serious injury to Student Officer Springer.

163. After "Blue!" was called to end the training scenario, to gauge any perceived injury or threat of injury to trainees or role-players, no student or instructor could have

reasonably expected the dangers of assaults and battery generally typical of a domestic violence scene, real or planned for the purposes of training.

164. At all times relevant hereto, Defendants acted with ill-will and actual malice.

165. Defendant Prince George's County is vicariously liable for Defendant Qualls's wrongful acts.

166. As a result of Defendant Qualls's conduct and actions, Plaintiff has suffered and will continue to suffer severe mental anguish, extreme and permanent pain and suffering, injuries, and emotional distress, in addition to medical and other related expenses, and loss of income, all to Plaintiff's detriment.

WHEREFORE, Plaintiff Vanessa Springer demands judgment against Defendants Prince George's County and Michelle Qualls in an amount to be determined at trial but not less than FIVE MILLION DOLLARS ($ 5,000,000.00), plus interest, costs, attorney's fees, and punitive damages as against Defendant Qualls in an amount to be determined at trial.

COUNT V

Violation of Article 24 of the Maryland Declaration of Rights – Deprivation of Due Process—All Defendants

167. Plaintiff adopts and incorporates by reference each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

168. By the actions detailed above, Defendant Prince George's County and Cpl. Qualls deprived the Plaintiff of her rights under Article 24 of the Maryland Declaration of Rights, including but not limited to failure to adequately supervise Defendant Qualls after the BST Training Scenario was terminated.

169. Defendant Prince George's County and is employees, assigns, and agents, including but not limited to the unidentified male role player, Lt. Disque, and Cpl. Burd

silently observed and tacitly condoned Defendant Qualls' conduct when she violently unleashed her anger against Ms. Springer by intentionally and repeatedly beating Plaintiff Ms. Springer, all to the contrary to Cpl. Burd's order calling "Blue!," which instructed role players and trainees to cease all activity in the domestic violence scenario.

170. By the actions detailed above, Defendant Prince George's County deprived the Plaintiff of her rights under Article 24 of the Maryland Declaration of Rights by knowing of Defendant Qualls's capacity for and history of violence, and unlawfully permitting Defendant Qualls to illegally beat, punch, knee, and threaten Plaintiff, a mere trainee, out of sheer anger and retaliation.

171. Defendant Cpl. Qualls has a publicly documented history alleging prior violent conduct.

172. By the actions detailed above, Defendant Prince George's County and Cpl. Qualls deprived the Plaintiff of her rights under Article 24 of the Maryland Declaration of Rights, including but not limited to failure to properly investigate Plaintiff's complaint of the assault and battery.

173. Prince George's County Police Department employees, servants or agents, including but not limited to the unidentified male role player, Lt. Disque, Cpl. Burd, Cpl. Fowble, Sgt. McClenan, and Sgt. Ashton witnessed and/or had knowledge of Plaintiff Ms. Springer's, a Student Officer at CPI, assault by Cpl. Qualls during the BST scenario on Thursday, December 4, 2008.

174. Sgt. Ashton spoke to Sgt. McClenan on December 8, 2008 with knowledge that Student Officer Springer wanted to file a complaint for disparate treatment and excessive force based on the incident and injuries she suffered on December 4, 2008, and upon

information and belief, Sgt. Ashton conveyed his knowledge of the same to Sgt. McClenan by phone on December 8, 2008.

175. Together, Sgt. Ashton and Sgt. McClenan acted to purposefully delay Ms. Springer from promptly filing her complaint against police practices with Internal Affairs by instructing Ms. Springer to mail her complaint in writing, with knowledge it would not be received for several days, rather than appear for an interview the same day.

176. Moreover, together, Sgt. Ashton and Sgt. McClenan acted to purposefully delay the need for any further investigation of any complaint against police practices filed by Plaintiff Springer with Internal Affairs, since soon after holding his conversation with Sgt. Ashton on December 8, 2008, Sgt. McClenan met with Plaintiff Springer at CPI to request her resignation and inform her that her failure to do so would lead to her inevitable termination within 24 hours.

177. Thus, Defendant Prince George's County both deliberately delayed Plaintiff from filing an internal complaint, and also failed to adequately investigate Ms. Springer's complaint of disparate treatment and excessive force, since it believed Ms. Springer to be on Administrative Leave pending her termination from the Prince George's County Police Department.

178. Upon information and belief, no Prince George's County Police Department officer with knowledge of the assault against Ms. Springer filed a complaint, request for investigation, or informed a supervisor about the assault and injuries suffered by Ms. Springer on December 4, 2008.

179. In fact, it was not until December 9, 2009 and after Plaintiff Springer already reported back to Lt. Disque that she refused to resign and was awaiting receipt of paperwork

assigning her Administrative Leave pending her termination from employment, that Major Rosser approached Ms. Springer in the hall to say hello and was informed for the first time of the assault that occurred by Cpl. Qualls against Ms. Springer, by Ms. Springer herself.

180. Defendant Qualls, at all relevant times hereto, acted under color of State law and in a manner that was not objectively reasonable, by intentionally assaulting and battering Plaintiff, a Student Officer, after the BST domestic violence training scenario was explicitly over.

181. Defendant Prince George's County Police Department, by and through its agents, employees, or servants including but not limited to the unidentified male role player, Lt. Disque, Sgt. Ashton, Sgt. McClenan, and Cpl. Burd, acted under color of State law and in a manner that was not objectively reasonable, by failing to supervise Cpl. Qualls after the BST scenario was over; by maintaining knowledge of Defendant Qualls' history of violence and still permitting her to repeatedly beat Plaintiff Springer out of anger and retaliation; and by failing to investigate Plaintiff's complaint regarding her assault by Defendant Qualls and disparate treatment at CPI.

182. At all time relevant hereto, Defendants acted with ill-will and actual malice.

183. Defendant Prince George's County is vicariously liable for Defendant Qualls's wrongful acts.

184. As a result of Defendant Qualls's conduct and actions, Plaintiff has suffered and will continue to suffer severe mental anguish, extreme and permanent pain and suffering, injuries, and emotional distress, in addition to medical and other related expenses, and loss of income, all to Plaintiff's detriment.

WHEREFORE, Plaintiff Vanessa Springer demands judgment against Defendants Prince George's County and Michelle Qualls in an amount to be determined at trial but not less than FIVE MILLION DOLLARS ($ 5,000,000.00), plus interest, costs, attorney's fees, and punitive damages as against Defendant Qualls in an amount to be determined at trial.

COUNT V

Pattern or Practice of Improper Conduct—All Defendants

185. Plaintiff adopts and incorporates by reference each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

186. Upon information and belief, Prince George's County Community Policing Institute has a practice and policy of video-taping selected individual student officers who are on the track to fail or are identified as "Remedial" in the recruiting program or CPI during BST.

187. Upon information and belief, when CPI instructors failed to videotape Plaintiff on her final BST call on December 4, 2008 at approximately 12:15 P.M., CPI instructors for Session 114's BST failed to comply with their own practice and policy to video tape Remedial recruits for BST training and improvement purposes because Plaintiff was one of at least four Student officers who was scheduled to perform a Remedial scene on the day scheduled for Remedial scenarios.

188. Moreover, upon information and belief, CPI Instructors have a practice and policy of encouraging, lecturing, harassing, intimidating, and "hazing" certain individual Student Officers against continuing in the CPI training to become a Prince George's County Police Officer if they believe the Student Officer does not fit in or if they do not like the recruit, AKA Student Officer. CPI Instructors employ several forms of intimidation, hazing,

group and/or individual counseling, and threats to coerce any specific Student Officer into resigning from the County's recruiting program.

189. For example, the Defendant Prince George's County Police Department's Community Policing Institute maintains a "psychiatric" department. Mr. Hogwood works in that department but is not a psychologist or psychiatrist.

190. During Session 114, Ms. Springer was approached by Mr. Hogwood from the psychiatric department. Mr. Hogwood ordered her to contact him at 6:00 P.M. every Tuesday to discuss issues and conflicts she was experiencing during the course of CPI training and instruction.

191. Ms. Springer dutifully complied with Mr. Hogwood's orders and called Mr. Hogwood each Tuesday beginning in or around fall 2008 until December 9, 2008. During her conversations with Mr. Hogwood, Ms. Springer disclosed private thoughts and concerns regarding the disparate treatment she received at the academy, including but not limited to, name calling from CPI instructors such as ghetto, hoochie, of which she was the subject.

192. It was only after she was terminated that that Ms. Springer learned that Mr. Hogwood is not a psychologist, and that in fact, he and Sgt. Salen, Ms. Springer's sergeant and instructor at CPI, were close colleagues and friends.

193. Upon information and belief, Mr. Hogwood disclosed the information Ms. Springer confided to him regarding her concerns and the treatment she received as a Student Officer at CPI from her instructors, to Sgt. Salen, and that Sgt. Salen permitted the excessive force to which Student Officer Springer was a victim on December 4, 2008 because of it, and because Sgt. Salen believed it would evoke Ms. Springer's resignation from the academy at CPI.

194. On December 9, 2008, a Tuesday, Ms. Springer called Mr. Hogwood as scheduled, and informed him about the events of the day leading to her being placed on administrative leave for refusing to resign. It was clear that Mr. Hogwood, too, had an interest in Ms. Springer's resignation, since despite her qualified and satisfactory performance throughout the academy, Mr. Hogwood encouraged Ms. Springer to resign without cause. Then he suggested that if the Department wanted to, that they would fire her for any reason since they had done so before. He said, "If they want, they're gonna get you! They're gonna get you! They're gonna get you!"

195. Based on Ms. Springer's last conversation with Mr. Hogwood, the Defendant Department employs similar efforts to order certain individual Student Officers to "confide" in employees of the Department who are not in fact psychologists but represent themselves to be, and then uses the confidential and private information to intimidate, harass, and eventually force Student Officers out of training at CPI.

196. When CPI Instructors for Session 114 resorted to assaulting Plaintiff on December 4, 2008, they were acutely aware that the purpose of sending Plaintiff into a remedial domestic scenario was to physically intimidate Plaintiff into submitting her resignation, which they were unable to convince Plaintiff to do the previous evening on December 3, 2008.

197. Moreover, upon information and belief, CPI instructors purposefully did not videotape this final scene because they knew if videotaped, the assault committed by Cpl. Qualls, a larger and stronger woman, which Instructors and CPI leadership tacitly approved and/or had knowledge of, would contravene Prince George's County Police Department Policy that prohibits excessive force, would violate Plaintiff's Article 24 rights under the

Maryland constitution, and would violate criminal law prohibiting assault and battery in the State of Maryland. In light of this understanding, CPI instructors affirmatively refrained from videotaping what each of them knew or expected would result in an assault against Plaintiff during her second BST scenario of the day on December 4, 2008 so that no evidence illustrating the assault episode would remain.

198. Furthermore, Cpl. Fowler and Cpl. Larson's orders to Plaintiff to take her belongings and go home immediately after she was assaulted at 1151 Atlee Drive on Thursday, and to not report to the CPI on Friday, December 5, 2008 for additional trainining or remedial BST scenarios, purposefully set Plaintiff up for any alleged failure to complete additional BST scenarios required of her.

199. Even more, CPI instructors including Lt. Disque, Cpl. Burd, and the Officer who role-played the Complainant for the scene, stood idly as Cpl. Qualls violently beat Plaintiff. Their failure to comment, proactively prevent, or break up the fight constitutes a failure of their duty to protect the public, particularly because Cpl. Qualls's assault of Plaintiff clearly occurred outside the context of the training exercise, as an order to stop the activity was called before the assault began.

200. Since her termination from the Prince George's County Police Department, Ms. Springer spoke on occasion with Cpl. Thompson. Cpl. Thompson, a former Basic Survival Training instructor at CPI, confirmed that the perverted behavior was typical of Department practice for CPI. During their conversation, Cpl. Thompson stated that the sexual harassment, assault, and relentless pressure for someone like Ms. Springer to resign from the academy, followed by her termination did not surprise him, as it was a pattern.

201. During Ms. Springer's conversation with Cpl. Thompson, he stated to Ms. Springer that that she could have avoided her situation if she had "gone with the flow" and "put out." As a former Basic Survival Training instructor for CPI himself, Cpl. Thompson noted that Ms. Springer's refusal to become an instructor's "jump-off" coincided with her fate being similar to many past female student officers at the Prince George's County Community Policing Institute. Thus, the recurring pattern of behavior of the students and instructors named above and of the Community Policing Institute's instructors created an environment where it was impossible for Ms. Springer to receive the training she required to become a member of the Prince George's Police Department, regardless of her fitness and performance throughout the academy.

202. Defendants Prince George's County and the Community Policing Institute maintained a policy of unconstitutional and unlawful brutality and use of excessive force in the CPI training academy. The Defendants' specific conduct here, including injuring academy members, as well as attempting to intimidate academy members into resigning, and deprivation of rights under Article 24 of the Md. Declaration of Rights, as set forth herein, represents not a single, isolated, accidental, or peculiar event, but occurred in the regular customs and procedures followed by CPI officers and instructors, and constitutes a pattern or practice of such conduct without supervision.

203. Prior to the date of this incident, Defendants Prince George's County, Maryland and CPI Instructors and Officials permitted and tolerated a pattern and practice of unjustified, unreasonable, and illegal excessive force and brutality against CPI academy members or Student Officers.

204. Moreover, Defendant Prince George's County failed to properly train, prosecute, supervise, and discipline the officers of its police department's Community Policing Institute, including, but not limited to, Cpl. Qualls, in the proper constitutional use of force as required by the Maryland Declaration of Rights, in properly documenting BST scenarios for remedial student officer scenarios, or in properly re-applying for and maintaining instructors' certifications. The failure to properly train, prosecute, supervise, and discipline its officers demonstrates a gross disregard for the constitutional rights of the public in the Plaintiff, and was a proximate cause of the injuries to the Plaintiff.

205. In addition, Defendant Prince George's County caused its Community Policing Institute instructors, police officers, and employees of its police department's academy to believe that their use of excessive force, failure to follow Department procedures, and failure to maintain their certifications would not be aggressively, honestly, and properly investigated.

206. As a result, Prince George's County Community Policing Institute and its employees have been caused and encouraged to believe that excessive and illegal force, intimidation, and harassment tactics could be used to intimidate and injure CPI academy members into resigning, and that it would be permitted without reproach.

207. Defendant Prince George's County should have foreseen that such a policy and custom would promote the use of illegal, unconstitutional, and excessive force where such force is unreasonable; and that such a policy and custom would promote the failure to follow CPI policies, for instance consistently video-taping remedial BST scenarios; and that such a policy and custom would promote failure to maintain certifications to instruct CPI student officers where such failures are unlawful and unreasonable.

208. Defendant Prince George's County has instituted and maintained formal and informal customs**,** policies, and practices that foster, promote and encourage officers to violate the rights of citizens.

209. The use of excessive force; disparate treatment in retaliation for complaints of the above; and failure to maintain Instructor certifications occurs so frequently that it has become an accepted manner by the individual Defendant Cpl. Qualls and other employees of the Prince George's County Police Department's Community Policing Institute. This is a result of Prince George's County's failure to establish effective procedures, rules, orders, guidelines and practices to ensure that such violations do not occur, and to ensure that allegations of such violations will be thoroughly investigated and appropriately punished when found to have occurred. As a result of this failure, there has been a regular pattern and practice of conduct similar to that complained of here. This pattern and practice has been manifested in other prior incidents involving student officers, and employees of the Prince George's County Police Department's Community Policing Institute.

210. For example, upon information and belief, Prince George's County has assaulted and forced the resignation of other CPI Student Officers before Plaintiff Springer. Student Officer Banks of Session 113, the session just before Plaintiff Springer's, was intimidated, similarly assaulted, and forced to resign from CPI. Upon information and belief, Student Officer Banks was shoved to the ground by a CPI instructor, and forced to resign. He was then permitted to return to the CPI during Session 114, but was soon forced to resign again early into session 114, before he was permitted to advance any further in the academy.

211. Moreover, the defendant, Cpl. Qualls's, as well as other CPI Instructors' use of excessive force and brutality to intimidate and injure Student Officers is a result of Defendant

Prince George's County's failure to properly supervise these same instructors during their trainings of Student Officers.

212. Upon information and belief, Defendant Prince George's County lacks an effective internal affairs procedure in its police department and has no meaningful system to control and monitor its officers, instructors, and employees who have a pattern or history of unlawful behavior, including Cpl. Qualls's history of domestic violence.

213. Defendant Prince George's County has failed and refused to take even elementary steps to protect citizens from the type of abuses detailed above.

214. The policies and customs of the Prince George's County Police Department, as set forth herein, demonstrate a gross disregard for the constitutional and other rights of the public and the Plaintiff. At the time of the occurrence alleged in this complaint, the individual Defendant, Cpl. Qualls, was operating under unconstitutional customs, policies, and procedures of the Prince George's County police department. These customs, policies, and procedures were a proximate cause of the injuries to the Plaintiff.

215. As a proximate result of the aforesaid acts, omissions, systemic flaws, policies, and customs of Prince George's County, the individual Defendant, Cpl. Qualls, deprived the Plaintiff of her rights under the Maryland Declaration of Rights as detailed above.

216. At all times during the occurrence on December 4, 2008, Defendant Cpl. Qualls was the alter ego of Defendant Prince George's County and was acting in accordance with established procedures and policies of Defendant Prince George's County, and all the Defendants' acts were intentional and in furtherance of the Defendant Prince George's County's established policy and practice.

217. In sum, the execution of the policy or custom of Defendants Prince George's County and Cpl. Qualls, inflicted injury upon the Plaintiff.

218. As a direct and proximate result of the conduct and actions of the Defendants, the Plaintiff was caused to lose considerable time and wages from work, and to suffer great mental anguish, humiliation, embarrassment, loss of respect, shame, loss of enjoyment of life, disability and loss of earning capacity, all to her detriment.

219. As a direct and proximate result of the Defendants' conduct and actions, the Plaintiff will continue to endure mental anguish in the future.

220. As a direct result of these deprivations, Plaintiff was subjected to extreme and permanent pain and suffering, debilitating injury to her head, back, neck, and vision, harassed, humiliated, and subjected to undue infliction of emotional distress. The defendants attempted to coerce plaintiff to resign and thereafter assaulted her and again requested her resignation without cause, resulting in plaintiff's termination from CPI for refusing to resign, all while Defendants ignored and/or neglected to investigate Plaintiff's medical injuries from the assault inflicted by Defendant's own CPI instructors and officers, and all while Defendant Prince George's County ignored and/or neglected to investigate Defendant Qualls's history of violence and excessive force, including her background as an aggressor of domestic violence.

221. Defendant Prince George's County failed to discipline Cpl. Qualls for her past violence and brutality and upon information and belief, failed to investigate Cpl. Qualls's conduct and assault of the Plaintiff on December 4, 2008.

222. As a further direct and proximate result of the conduct and actions of the Defendants, the Plaintiff suffered, and will continue to suffer, substantial damages, including, but not limited to, extreme and permanent pain and suffering, permanent and debilitating

injury to her head, back, neck and vision including permanent light sensitivity, as well as humiliation, mental distress, and monetary losses. severe and extreme emotional distress, lost time and wages from work, mental anguish, humiliation, embarrassment, loss of respect, shame, loss of enjoyment of life, disability and loss of earning capacity, all to her detriment.

223. The aforesaid acts of the defendants were undertaken with actual malice.

224. The Plaintiff further alleges that all of his injuries, losses and damages – past, present and prospective – were caused solely by the actions of the Defendants, as set forth above, without any negligence, want of due care, or provocation on the part of the Plaintiff, either directly or indirectly.

WHEREFORE, Plaintiff Vanessa Springer demands judgment against Defendants Prince George's County and Michelle Qualls in an amount to be determined at trial but not less than FIVE MILLION DOLLARS ($ 5,000,000.00), plus interest, costs, attorney's fees, and punitive damages as against Defendant Qualls in an amount to be determined at trial.

JURY DEMAND

Plaintiff demands a jury trial as to all issues so triable.

Respectfully submitted,

JOSEPH, GREENWALD & LAAKE, P.A.

By: _____

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