

I, Saundra Edwards (the “Complainant”), experienced discrimination on the basis of race, gender, retaliation, and wrongful termination by Framingham Public Schools (the “District” or “Respondent”), in violation of Massachusetts General Laws Chapter 151B and Title VII of the Civil Rights Act of 1964.

Introduction and Overview

1. My name is Saundra Edwards, and I am a Black woman. In September 2021, I assumed a leadership role within Framingham Public Schools as the District’s Diversity, Inclusion, and Compliance Manager, working in the Central Office. In this role, I was responsible for handling civil rights complaints and managing bullying investigations involving staff, faculty, and students. Soon after I was hired, due to my expertise, diversity-related leadership position, and identity as a Black woman, staff members of color began sharing concerns about workplace discrimination and requesting my support in Human Resources meetings. By April 2023, morale among employees of color had severely declined. Around that time, I joined three of the five Black women in the Central Office in requesting assistance from a local reverend to facilitate a meeting with the Superintendent, addressing the concerns of employees of color. Fearful of retaliation from co-workers, the three women and I participating in the meeting with the Superintendent asked for anonymity to share our grievances. Instead, the Superintendent made our identities and concerns public, and we were pejoratively and derisively branded “The Framingham 4” by our peers. The District did not make any meaningful changes.
2. I was denied promotions and advancement opportunities. On October 13, 2023, I was told that my title was being changed to “Manager of Student Investigations” and that my role was being diminished to focus only on student investigations. In response, I suggested that my title be changed to “Manager of Civil Rights Investigations and Compliance” to better reflect the scope of my responsibilities. Based on my scope of work and performance, I also requested a corresponding salary increase. My request for a title change was denied, but I was offered a “salary compromise,” consisting of a revised work schedule. I was also told I was a “valued employee.” Just four days later, on October 17, 2023, I was informed that I would no longer be responsible for managing investigations of staff complaints. I was also told I would no longer be responsible for managing bullying investigations. Instead, I would be tasked with conducting all student bullying investigations across over a dozen schools within the District. I suggested that this workload was excessive and unmanageable. Nevertheless, I was told to “try it.” This workload was punitive. It was also a demotion because it undermined and diminished my supervisory role.
3. In early 2024, I participated in an internal civil rights investigation concerning discrimination complaints raised by women of color in the District’s Community Resources Development department. On March 25, 2024, I received a Letter of Expectations from the Superintendent, alleging unprofessional conduct during that investigation. I submitted a written response on March 27, 2024, explaining that my comments reflected concerns previously shared by aggrieved employees and that my participation in the investigation was protected activity. On March 28, 2024, I was informed that my position would be terminated for “budgetary reasons,” effective June 30, 2024. Additionally, the Black women who participated in the April 2023 meeting

facilitated by the reverend were also terminated. None of us were reassigned to other positions within the District, while other white employees whose roles were eliminated were reassigned. After my departure, student investigations were reassigned back to the principals across the District's schools, confirming that the investigatory workload far exceeded one person's capacity.

Factual Allegations

4. I began working for Framingham Public Schools in September 2021. My title was Manager of Diversity, Inclusion, and Compliance. This was a new Central Office position within the recently established Office of Equity. Among other duties, I was responsible for investigating internal complaints of civil rights violations, conducting Title IX investigations, and managing bullying investigations involving staff, faculty, and students throughout the District.
5. Almost immediately after I began, staff members of color began to trust me and confide in me regarding discrimination by supervisory staff, including the Human Resources (HR) Director and Superintendent. During the course of my employment, in my diversity-related leadership position, the culture fostered by the District was described to me as “racist,” “oppressive,” and “retaliatory.” Many staff members requested that their complaints remain anonymous due to mistrust of the administration and fear of retaliation. In my role, I was responsible for advocating on behalf of employees and helping to change the District's culture. However, the District sought to silence me for my leadership and advocacy.
6. In meetings where I advocated for aggrieved employees who came to me in confidence and requested anonymity, the District's leadership labeled me as “angry,” “loud,” “argumentative,” “aggressive,” and “animated.” The repeated use of coded language to describe me reflects racially gendered stereotypes that are commonly weaponized to discredit professional Black women. These stereotypes were not rooted in any documented performance concern and were pretextual to justify adverse employment actions.
7. I responded with a detailed email explaining that I take pride in my training, knowledge, and professionalism, and that I believed the language used by the District's leadership reflected harmful racially gendered stereotypes commonly applied to Black women. I invited the HR Director and Superintendent to meet with me to discuss the matter, but I received no response.
8. Beginning in early 2022, employees of color increasingly relied on me for moral support, particularly in meetings convened by HR. At their request, I attended these meetings in a supportive role. Although the HR Director initially questioned my presence, she ultimately allowed me to attend as long as I remained silent.
9. During this time, the HR Director acknowledged on more than one occasion that she was aware of the mistrust employees of color had toward the HR Department. She explained that these issues were longstanding and predated my employment. She also asked me to help her rebuild relationships with diverse employees. When I asked several employees of

color whether they would be willing to participate in such a meeting, they declined, citing longstanding grievances and the District's hostile work culture.

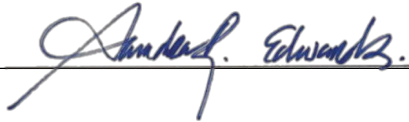
10. By April 2023, morale among employees of color had significantly deteriorated. I had received repeated complaints of discrimination, met with staff members in tears, and witnessed the departure of at least eighteen employees of color from the District during my tenure. In response, I contacted a local reverend with an existing relationship with the District and asked for assistance addressing the toxic environment. Three of the five Black women in the Central Office joined me in a meeting with the reverend, and together we asked him to mediate a conversation with the Superintendent.
11. Throughout 2023, work conditions did not improve. Other employees of color and I continued to be passed over for promotions and advancement opportunities that were offered to our white colleagues. I understand that aggrieved employees sought recourse with the Massachusetts Commission Against Discrimination.
12. On October 13, 2023, I requested a title change to "Manager of Civil Rights Investigations and Compliance" to better reflect the scope of my responsibilities and a corresponding salary increase. My request for a title change was denied, but I was offered a "salary compromise," consisting of a revised work schedule. I was also told I was a "valued employee." However, the reassignment of my duties, increased workload, and removal of my supervisory responsibilities were material and adverse.
13. On October 17, 2023, I was informed that I would no longer be responsible for managing staff complaints. I was also informed that I would no longer be responsible for managing bullying investigations; instead, I was tasked with conducting all student bullying investigations across over a dozen schools within the District. I complained that the workload was excessive and unmanageable.
14. In early 2024, I participated in an internal civil rights investigation concerning discrimination complaints raised in October 2023 by women of color in the District's Community Resources Development department against their supervisor, Director of Community Resource Development, Adeyemi Ajao.
15. On March 25, 2024, I received a Letter of Expectations from the Superintendent, alleging unprofessional conduct during the civil rights investigation. The letter referenced my statements to the investigator, including employees referring to Director Ajao as "Uncle Tom" and expressing concerns that he caters to white employees while ignoring the needs of employees of color. While my statements were relevant to the civil rights investigation, the District penalized me.
16. The Letter of Expectations contained language suggesting disciplinary intent and included a perfunctory disclaimer that it was not intended to be punitive.
17. On March 27, 2024, I submitted a written response to the Letter of Expectations, explaining that my comments during the civil rights investigation reflected concerns previously shared with me by employees of color. I also noted that my participation and expression were protected activities.

18. On March 28, 2024, I was informed that my position was purportedly terminated for “budgetary” reasons, effective June 30, 2024. The stated rationale is a pretext for unlawful discrimination and retaliation. Respondent did not provide any meaningful opportunity to be heard, appeal, or file a grievance.
19. The Black women who participated in the April 2023 meeting with the reverend were also terminated by Respondent. None of us were reassigned to other positions within the District, while several white employees whose roles were also eliminated were reassigned by Respondent. The differential treatment of similarly situated white employees, who were reassigned rather than terminated when their roles were eliminated, further underscores the discriminatory and retaliatory nature of the District’s actions.
20. As the Manager of Diversity, Inclusion, and Compliance, I was tasked with ensuring the District’s adherence to civil rights laws. Retaliating against me for performing those core responsibilities undermines the District’s own compliance obligations and has a chilling effect on oversight and enforcement within the workplace.
21. The toxic environment that employees of color face also has a harmful impact on students. In a District where more than 50% of the students identify as non-white, there is a critical need for more educators and administrators of color. *See* Department of Elementary and Secondary Education (DESE), Enrollment Data (2024-25), *available at* <https://profiles.doe.mass.edu/profiles/student.aspx?orgcode=01000000&orgtypecode=5> (noting majority-minority student population). Deprioritizing diversity helps explain profound disparities in the District’s achievement gaps, including discipline and drop-out rates. *See* DESE, Student Discipline Data Report (2023-24), *available at* <https://profiles.doe.mass.edu/ssdr/default.aspx?orgcode=01000000&orgtypecode=5&=01000000&> (compare 6.9% in-school discipline for Black students *with* 1.9% for white students); *see also* DESE, Student Dropout Rate Report (2022-23), *available at* <https://profiles.doe.mass.edu/dropout/default.aspx?orgcode=01000000&orgtypecode=5&leftNavId=15627&> (compare 10.4% drop-out rate for Latinos *with* 1.9% for white students).
22. After my departure, student investigations were reassigned back to the principals of over a dozen schools within the District, confirming that the investigatory workload far exceeded one person’s capacity. This further supports the conclusion that the reassignment was punitive and pretextual, rather than operationally justified.
23. The repeated denial of promotions, high attrition rates among staff of color, and the targeting of my vocal advocacy for workplace fairness collectively demonstrate a custom, pattern, and practice of discrimination and retaliation against employees of color within the District.
24. The District’s “budgetary” rationale is a pretext for unlawful discrimination and retaliation. The close temporal proximity between my participation in the protected internal civil rights investigation and the issuance of the Letter of Expectations—followed immediately by my termination—demonstrates discriminatory and retaliatory animus. As a Black woman, I

was terminated based on unlawful discrimination and retaliation in violation of M.G.L. c. 151B and Title VII of the Civil Rights Act of 1964.

25. I made multiple good-faith efforts to raise these issues through internal channels. Despite these efforts, I have suffered significant reputational and professional harm and severe emotional distress. I respectfully seek all available legal and equitable remedies, including but not limited to back pay, front pay, compensatory damages, emotional distress damages, legal costs, and attorneys' fees to address the harm caused by the District's unlawful actions.
26. I am also respectfully requesting the implementation of policy changes to promote transparency, accountability, and workplace fairness in the District. These reforms should include but are not limited to: hiring an independent investigator to conduct an equal opportunity and fairness audit; adopting stronger nondiscrimination and anti-retaliation policies; requiring senior administrators to undergo comprehensive nondiscrimination training; and establishing a meaningful process for employees to appeal adverse employment decisions. These measures will help ensure that the District treats all employees fairly with equal access to opportunity and redress.

Signed under pains of perjury this 23rd day of April, 2025



NOTICE OF APPEARANCE

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Please direct all correspondence regarding this matter to the undersigned attorney.

/s/ Erika Richmond Walton

Cc: Superintendent Robert Tremblay, Framingham Public Schools

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