

CHARGE OF DISCRIMINATION  
MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION

EEOC NUMBER:

FILING DATE: February 10, 2023  
VIOLATION DATE(S): July 1, 2021 and  
continuing through the present.

NAME OF AGGRIEVED PERSON OR ORGANIZATION:

Omar Easy, Ph.D., MBA  
[REDACTED]

TELEPHONE NUMBER: [REDACTED]

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY,  
STATE/LOCAL GOVERNMENT AGENCY, OR PERSON WHO DISCRIMINATED  
AGAINST ME:

Wayland School Committee  
41 Cochituate Road  
Wayland, MA 01778

TELEPHONE NUMBER: 508-358-7728  
NO. OF EMPLOYEES: 50+

Wayland Public Schools  
41 Cochituate Road  
Wayland, MA 01778

TELEPHONE NUMBER: 508-358-7728  
NO. OF EMPLOYEES: 50+

Town of Wayland  
c/o Wayland Select Board  
41 Cochituate Road  
Wayland, MA 01778

TELEPHONE NUMBER: 508-358-7701  
NO. OF EMPLOYEES: 50+

Chris Ryan (Individually)  
Chair, Wayland School Committee  
c/o Wayland Public Schools  
41 Cochituate Road  
Wayland, MA 01778

TELEPHONE NUMBER: 508-358-7728

Ellen Grieco (Individually)  
Vice Chair, Wayland School Committee  
c/o Wayland Public Schools  
41 Cochituate Road  
Wayland, MA 01778

TELEPHONE NUMBER: 508-358-7728

## **CAUSE OF DISCRIMINATION BASED ON:**

Race and racial harassment in violation of M.G.L. c. 151B, § 4(1), and Title VII; retaliation in violation of M.G.L. c. 151B, § 4(4) and Title VII; threats, coercion, intimidation and/or interference in violation of M.G.L. c. 151B, § 4(4A); aiding, abetting, inciting and/or coercion in violation of M.G.L. c. 151B, § 4(5).

## **THE PARTICULARS ARE:**

1. In February 2021, I was named the Superintendent of the Wayland Public Schools. On December 21, 2022, I was the victim of a hate crime at work—the words “OMAR = N\*\*\*\*R” were scrawled on public property adjacent to the high school. A true and accurate copy of that graffiti is attached as Exhibit A. This is not the first time explicitly racist behavior has targeted me, Black employees, and Black students in Wayland. Such behavior has been the apex of a hostile work environment fostered and stoked by the Wayland School Committee—and in particular Chair Chris Ryan and Vice Chair Ellen Grieco. On February 8, 2023, less than three weeks after I raised concerns about such unlawful conduct in writing to the School Committee, I was forced from my job and placed on leave without explanation. This unlawful conduct has caused me severe and persistent harm. The following details provide some, but not all, of the unlawful conduct I have suffered.
2. I am Black, and the first person of color to serve as Superintendent of Schools in the history of Wayland. Wayland has had four Superintendents over the past 50 years—each White—with an average tenure of 12.5 years in the job. Prior to joining Wayland, I spent approximately eight years as a senior administrator in Everett / Everett Public Schools. Everett, where I also grew up, has a Black population of ~6,500 (13%) whereas Wayland’s Black population is ~120 (less than one percent).
3. In my role as Superintendent, I report directly to the Wayland School Committee (the “School Committee”), which is an instrumentality of the Town of Wayland (the “Town,” and collectively with the School Committee and the Wayland Public Schools, “Wayland”).
4. For my entire time as Superintendent, all members of the School Committee have been White. During that time, I have been one of only three Black members of the Administrative Council—a group of approximately 20 senior administrators, including building Principals and assistant Principals, of the Wayland Public Schools.
5. By all objective measures, I have performed well as Wayland’s Superintendent. In or about June 2022, the School Committee rated my performance Proficient. I also helped secure over \$460,000 in grants, which have been put to use directly benefitting Wayland students. I was also able to deftly manage to ensure a safe learning environment through the COVID pandemic, including by extending pool-testing throughout the 2021-2022 academic year, when many other Massachusetts school districts could not.
6. Despite my objective accomplishments as Superintendent, members of the School Committee—chiefly Chair Ryan and Vice Chair Grieco—have subjected me to unlawful

discrimination based upon my race, and retaliation for opposing unlawful discrimination. This unlawful conduct has included, without limitation, racial stereotyping, undermining, abusive and disparate treatment, unjustified and highly subjective attacks regarding my reputation and character, and the persistent failure to remedy a severe and pervasive racially hostile work environment.

7. By way of example, during the hiring process, Vice Chair Grieco suggested that Black people lacked leadership skills; she even asked the consultants organizing Wayland's search for a Superintendent to find additional White candidates after two of the three finalists were Black.
8. The School Committee, and Chair Ryan and Vice Chair Grieco in particular, have fanned the flames of an unlawfully hostile work environment, including by undermining my authority with subordinates, baselessly questioning my motives—furthering the racist trope that Black males are somehow suspicious and/or aggressive, and allowed thinly veiled—and at times flagrant—racism against me to persist.
9. As an early example, less than eight weeks on the job, during my first leadership retreat, two White administrators, Tricia O'Reilly and Richard Whitehead, refused to participate in my planned programming. Chair Ryan and Vice Chair Grieco tacitly condoned this insubordination by sitting silently and failing to support me.
10. Six weeks later, in or about October 2021, I was presented with allegations that one of those White administrators, Richard Whitehead, discriminated against the only Black building administrator in Wayland. The School Committee refused to support me as I tried to address Mr. Whitehead's behavior despite compelling evidence that he engaged in unlawful race discrimination. In fact, the School Committee's resistance to my remedial efforts was so pervasive, that I had to retain separate legal counsel on behalf of the School District—who agreed my efforts were warranted and appropriate—to effectuate the termination of Mr. Whitehead's employment.
11. As another example, the School Committee undermined my efforts to address racist graffiti at the middle school. In or about December 2021, we found graffiti including: "N\*\*\*\*R," "BLACK PEOPLE DIE," and "ALL BLACK PEOPLE NEED TO LEAVE THE DISTRICT NOW." After suggesting that cameras be placed in the school's halls—a measure already taken at the high school—I was accused of "destroying Wayland's culture" and "bringing Everett culture to Wayland"—a thinly veiled racist reference to my majority-minority hometown and prior employer. Despite issuing a blanket statement condemning the racist graffiti, the School Committee refused to support me and ultimately, I was unable to implement the hallway cameras.
12. Instead, the School Committee seized upon a highly subjective complaint by my subordinate, containing age-old racist stereotypes, to explore disciplinary action against me. At or about the same time that I was addressing racist graffiti at the middle school, an educator alleged that my mere presence in her office made her "extremely uncomfortable," stereotyping me as a big scary Black man with whom she did "not feel comfortable having

further meetings ... without another person present ....” Wayland neither addressed this unlawful stereotyping, nor referred the matter to my administrative team and me as was required. Instead, Wayland issued a public notice that discipline would be considered against me, and that the School Committee would meet to discuss my “reputation, character, physical condition or mental health ....” While no discipline was issued, the public damage to my authority and reputation was substantial.

13. More recently, Chair Ryan and Vice Chair Grieco further undermined me by encouraging and actively soliciting complaints against me from those making racist attacks. For example, on the heels of a letter writing campaign from the Wayland Teachers Association (“WTA”) replete with thinly veiled racist micro-aggressions, including vague and conclusory allegations of nefarious motives, and numerous demonstrably false attacks on my job performance, Chair Ryan and Vice Chair Grieco circumvented my authority and went behind my back to meet—alone—with the WTA members which encouraged additional complaints against me. Chair Ryan and Vice Chair Grieco then demeaned, humiliated, and further undermined my authority by empowering WTA members to criticize my decision making—including actions I had taken to address discrimination in the workplace—and baselessly attack my motives in a group setting.
14. As another example, the School Committee sat idly by while I was publicly demeaned and attacked. In or about March 2022, a member of the public spoke at a School Committee meeting, effectively calling me lazy—another well-worn racist trope—and attacking me for the pending departure of Richard Whitehead, who was asked to leave Wayland in part for discriminating against a Black colleague. Mid-sentence, this person stopped to demand that I look at him while he delivered his racially-tinged attack yet the School Committee did not intervene or stand up in my defense.
15. Instead, two weeks later, Wayland *again* issued public notice that discipline would be considered against me, and that the School Committee would meet to discuss my “reputation, character, physical condition or mental health ....” Again no discipline was ever issued—as there was no legitimate basis to do so—but with each such public humiliation, the reputational harm and damage to my authority and credibility increased.
16. Beyond facing race discrimination, the School Committee retaliated against me for undertaking efforts to eliminate unlawful discrimination. For example, in or about June 2022, Vice Chair Grieco tacitly approved the racist attack on a candidate for Special Education Director, whose credentials and experience were demeaned and diminished because they were obtained in Everett—*i.e.*, they were acquired in a heavily Black community. When I raised concerns about such discrimination with Chair Ryan, and later at a School Committee meeting, Chair Ryan attacked me and suggested I would face consequences for it, claiming that my comments were “bullshit” and by having raised the issue I did myself a “significant disservice.”
17. As another example, the School Committee actively opposed my efforts to protect myself from racists attacks. A Wayland employee, who happens to work two floors below my office, wrote to me calling me a “thug and a destroyer” and noting that while my four White

predecessors were collaborative and helpful, I was “a destroyer of relationships, and of goals of this town.” A true and accurate redacted copy of that email is attached hereto as Exhibit B. Wayland’s Town Manager and Chief of Police helped me secure a harassment prevention order, but the School Committee urged me to drop the matter.

18. Nonetheless, in or about July 2022, my performance was rated overall Proficient. Notably however, Vice Chair Grieco was not involved in providing this performance evaluation—she was recused from the process after I opposed her attempt to use her position on the School Committee to extract improper benefits for her family.
19. Following an investigation, in or about September 2022, I learned of clear evidence that a White teacher at the high school had unlawfully discriminated against a Black colleague and notified the perpetrator of my intent to dismiss her employment. On or about October 11, 2022, I learned of additional evidence of unlawful discrimination, and wrote a supplemental notice of termination.
20. Two days later, at an Administrative Council meeting, I gave a presentation about teacher-on-teacher harassment, and specifically raised the recent case of race discrimination at the high school while imploring my fellow senior administrators to live Wayland’s stated values, including anti-racism.
21. Angry about my efforts to eradicate unlawful discrimination, a number of White members of the Administrative Council complained to the School Committee thereafter, alleging—without specifics—that I had “attacked” and “intimidated” a number of participants at the meeting, seeking to further portray me as a big angry Black man.
22. Rather than follow policy and my employment agreement, Wayland—for the third time in my eighteen months of employment—issued public notice that discipline would be considered against me, and that the School Committee would meet to discuss my “reputation, character, physical condition or mental health ....” Upon information and belief, Wayland never publicly issued such notice about one of my White predecessors.
23. At that meeting, on or about November 10, 2022, in violation of the Commonwealth’s Open Meeting Law, the School Committee began to pile-on, raising for the first time the false allegation that I had failed to complete annual evaluations for several subordinates. Further, the School Committee *again* failed to abide by the requirements of my employment agreement to give me adequate notice of or refer to me the substance of the complaints against me and the complainants’ identities, thereby forcing me to file arbitration to protect and preserve my rights to that information.
24. My attorney and I expressed concern that the actions against me were unlawfully discriminatory / retaliatory. Nonetheless, Wayland persisted and, in late November 2022, hired outside counsel to build out a pretext to terminate my employment.
25. Before that attorney could conclude her work, however, I was publicly humiliated by racist graffiti. As an unfortunately predictable result of the racially hostile work environment

created by the School Committee's actions and inactions, on December 21, 2022, I was notified that the words "OMAR = N\*\*\*\*R" in huge letters were scrawled on public property—a community pool right next to the high school. See Exhibit A.

26. I wrote to the School Committee, attaching a picture of the racist screed, and asking what steps will be taken. A true and accurate copy of that email is attached hereto as Exhibit C. The School Committee issued a blanket statement repudiating the graffiti but failed to outline any concrete actions to address the racially hostile work environment facing me and my fellow Black employees in Wayland. Indeed, months later the School Committee has still not acted to remedy the racially hostile work environment.
27. On or about January 4, 2023, I raised concerns about the racially hostile environment in which I work, sharing my belief that the School Committee's conduct has created an environment where this racist graffiti was possible. I noted, among other things that "the public display of racism...this graffiti on the wall...pales in comparison to those who have been complicit in feeding this narrative, the microaggressions, the undermining, and the not so-subtle endorsement of bigotry...I have been facing these not-so-subtle attacks since August 21, 2021 as Superintendent of the Wayland Public Schools...and it has gotten more and more emboldened" reaching the point that equating me to the n-word seemed acceptable. I called on the School Committee to make things better and remedy this racially hostile work environment.
28. Instead of working to remove the unlawful conduct, the School Committee worked to remove me from my job. On or about January 18, 2023, upon information and belief the School Committee learned that its outside attorney found no evidence that I had engaged in misconduct. Rather than publicize this fact, the School Committee kept these findings secret and allowed the public cloud over me to persist.
29. The next day, January 19, 2023, I provided the School Committee with written details of my complaints of unlawful discrimination and retaliation.
30. In retaliation and without advance notice or explanation, less than three weeks later the School Committee removed me from my position. A true and accurate copy of that email is attached hereto as Exhibit D.
31. The next morning, the School Committee's actions appeared in the news, with the public implication being that my leave was due to the complaints raised against me in October 2022 or other misconduct on my part. Later that day, I wrote to the School Committee asking it to reconsider, clear my name, and restore me to my position so I can resume the important work I had started. A true and accurate copy of that email is attached hereto as Exhibit E.
32. As of the time I am filing this Charge of Discrimination, the School Committee has still failed to provide me any basis for its actions.


33. As a result of Respondents' discriminatory, retaliatory, and other unlawful actions, I have suffered, and continue to suffer, significant harm, including emotional distress.

[Remainder of Page Intentionally Left Blank]

I ALSO WANT THIS CHARGE FILED WITH THE EEOC:  X

**I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.**

**I SWEAR UNDER THE PAINS AND PENALTIES OF PERJURY THAT I HAVE READ THIS COMPLAINT AND THAT IT IS TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.**

  
Omar X. Easy, Charging Party

Signed this  10  day of February, 2023.



# **Exhibit**

# **A**



OMAR  
= NIGGER





**Exhibit**

**B**

From: [REDACTED]

Date: Mon, Aug 29, 2022 at 6:30 PM

Subject: { } [REDACTED]

To: Omar Easy <[omar\\_easy@waylandps.org](mailto:omar_easy@waylandps.org)>

You cannot deny { } of his 1st amendment rights and of our rights and 27+ year residents of Wayland to work or volunteer in this town. You work for us as tax payers in Wayland you are not King of this town, just an employee. You are in "in my opinion a thug and a destroyer". We have dealt with 4 Superintendents and all but you have not been collaborative and helpful. Not you, you are a destroyer of relationships, and of goals of this town.

--

Sincerely,

[REDACTED]

**Exhibit**

**C**

**From:** Omar Easy <omar\_easy@waylandps.org>  
**Sent:** Wednesday, December 21, 2022 9:31 AM  
**To:** School Committee; Chris Ryan; Jeanne Downs; Ellen Grieco; Erin Gibbons; Jessica Polizzotti  
**Cc:** Kevin F. Bresnahan; David I. Brody; Daniel I. Lampke; shafer@greeneandhafer.com; Omar Easy  
**Subject:** Picture of Superintendent called N-word  
**Attachments:** WHS Racial Image .jpg

CAUTION: External Email

Dear School Committee,

My hands are shaking as I type this email. This morning on the side of the High School Pool, the words "OMAR = NIGGER" was scrawled in white paint. A picture is attached.

I cannot begin to articulate how deeply upsetting this is. I look forward to hearing from you what immediate steps will be taken.

I am copying my counsel and School Committee counsel so that we can all get on the same page.

Thank you,

Omar X. Easy, Ph.D.  
Superintendent of Wayland Public Schools  
41 Cochituate Road  
Wayland, MA 01778

**Twitter: [Dr. Easy@SuperEasy21](https://twitter.com/DrEasy21)**

*Wayland Schools are Wayland's PRIDE, where we serve Every Child, Everyday!*

"Not everything that is faced can be changed, but nothing can be changed until it is faced."

~James Baldwin~

CONFIDENTIALITY NOTICE: The preceding message contains information that maybe confidential or that may constitute non-public information. It is intended to be conveyed only to the designated recipient(s) named above. If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete all copies of it from your computer system. Any use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful. Thank you in advance.



OMAR  
= NIGGER





**Exhibit**

**D**



**SCHOOL COMMITTEE**

Chris Ryan, Chair  
Ellen Grieco, Vice Chair  
Jeanne Downs  
Jess Polizzotti  
Erin Gibbons

**Wayland Public Schools  
Wayland, Massachusetts 01778**

February 8, 2023

Dear Dr. Easy,

This letter is to notify you that at its meeting on February 8, 2023, the Wayland School Committee voted to place you on paid administrative leave, effective immediately.

While on administrative leave, you are directed not to report to work, contact any Wayland Public Schools employees, or otherwise enter upon the grounds of the Wayland Public Schools, except with the prior approval of the School Committee Chair. You will continue to receive all compensation and benefits in accordance with your employment contract while on administrative leave.

Sincerely,

Chris Ryan

School Committee Chair

# **Exhibit**

# **E**



From: **Omar X Easy** <[oeasy40@gmail.com](mailto:oeasy40@gmail.com)>

Date: Thu, Feb 9, 2023 at 2:32 PM

Subject: Re: Dr. Easy Letter 02.08.2023

To: Chris Ryan <[chris\\_ryan@waylandps.org](mailto:chris_ryan@waylandps.org)>, Jeanne Downs <[jeanne\\_downs@waylandps.org](mailto:jeanne_downs@waylandps.org)>, Ellen Grieco <[ellen\\_grieco@waylandps.org](mailto:ellen_grieco@waylandps.org)>, <[Jessica\\_polizzotti@waylandps.org](mailto:Jessica_polizzotti@waylandps.org)>, [erin\\_gibbons@waylandps.org](mailto:erin_gibbons@waylandps.org) <[erin\\_gibbons@waylandps.org](mailto:erin_gibbons@waylandps.org)>

Dear Chris Ryan and Wayland School Committee,

I am in receipt of your February 8th letter on behalf of the School Committee. I am deeply troubled that shortly after I raised concerns about unlawful discrimination and retaliation at work, including actions and inactions of the School Committee, I am being removed from my position and ordered to stay home.

In fact, less than three weeks ago I provided the School Committee with my complaints in writing, and now without any advance notice or explanation I am being placed on administrative leave—a fact which I understand is being widely shared with employees of the Wayland Public Schools, and I just saw splashed in the news.

I am also deeply concerned that the School Committee is seeking to weaponize meritless and retaliatory complaints against me, with coordinated retention of outside counsel to “investigate” such complaints. I learned on or about January 19, 2023, that the School Committee was informed that there was no credible evidence that I had engaged in misconduct. Yet, rather than publicize this fact and support me in my role as Superintendent, the School Committee has chosen to keep it secret and allow the cloud of impropriety over me to remain—a cloud which last night’s action will only exacerbate.

Last November, in a public session the School Committee voted that it was appropriate for me to keep working through this so-called “investigation” regarding my alleged misconduct. Now, however, after I shared my concerns in writing about the School Committee’s unlawful conduct, I am promptly removed from my position.

Without further ado, I am asking that the School Committee reconsider this punitive and retaliatory action, and promptly restore me to my position so I can resume the important work we started.

Respectfully,

Dr. Omar X. Easy

On Wed, Feb 8, 2023 at 9:29 PM Chris Ryan <[chris\\_ryan@waylandps.org](mailto:chris_ryan@waylandps.org)> wrote:

Dear Dr. Easy,

Attached please find a letter from the Wayland School Committee as a follow up to our phone conversation this evening.

Sincerely,  
Chris Ryan

Wayland School Committee

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Omar X. Easy, Ph.D., MBA

" I do my best because I'm counting on you counting on Me."~Maya Angelou

--

Omar X. Easy, Ph.D., MBA

" I do my best because I'm counting on you counting on Me."~Maya Angelou

THE COMMONWEALTH OF MASSACHUSETTS  
COMMISSION AGAINST DISCRIMINATION

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OMAR EASY, PhD, MBA	)	
	)	
Complainant,	)	
	)	
v.	)	MCAD Docket No.:
	)	
WAYLAND SCHOOL COMMITTEE,	)	EEOC Docket No.:
WAYLAND PUBLIC SCHOOLS,	)	
TOWN OF WAYLAND,	)	
CHRIS RYAN, and	)	
ELLEN GRIECO,	)	
	)	
Respondents.	)	

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NOTICE OF APPEARANCE

Please enter the appearance of David I. Brody and Daniel I. Lampke, of Sherin and Lodgen LLP for the Complainant, Omar Easy, PhD, MBA, in the above-captioned matters.

Respectfully submitted,  
OMAR EASY, PhD, MBA  
By his attorneys,

/s/ David I. Brody  
David I. Brody (BBO #676984)  
Daniel I. Lampke (BBO #703597)  
Sherin and Lodgen LLP  
101 Federal Street  
Boston, Massachusetts 02110  
(617) 646-2000  
dibrody@sherin.com  
dilampke@sherin.com

Dated: February 10, 2023