

# **Bond Case Briefs**

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## **EMPLOYMENT - FLORIDA**

### **Arafat v. School Bd. of Broward County**

**United States Court of Appeals, Eleventh Circuit - December 4, 2013 - Fed.Appx. - 2013 WL 6244735**

Employee of county school board brought Title VII claims against board for sexual harassment, disparate treatment on basis of race, national origin, and religion, and retaliation, as well as claims for age discrimination under Age Discrimination in Employment Act (ADEA), and for gender discrimination under Equal Pay Act. The United States District Court for the Southern District of Florida granted board's motion to dismiss for failure to state a claim. Employee appealed.

The Court of Appeals held that:

- Employee failed to allege severe or pervasive harassment;
- Employee failed to allege protected activity, as element for retaliation; and
- Allegations did not support inference of age discrimination.

Female employee's conclusory and formulaic recitation of elements of Equal Pay Act claim, i.e., her allegation that male employees who worked jobs requiring equal skill, effort, and responsibility were paid more than her during her employment with county school board, without pleading of facts comparing her skill, effort, and responsibility levels to those males who were allegedly paid more, failed to state a claim under Equal Pay Act.