

Attachment 1

The Architect of the Capitol (Agency) discriminated against me and harassed me on the basis of my sex, and retaliated against me for my protected activity, when from November 2021 to September 2023 former Architect, Brett Blanton, and Acting Architect, Chere Rexroat, with support from my similarly-situated male colleagues including former Chief of Staff, Peter Bahm, former General Counsel, Jason Baltimore, former Chief Financial Officer, Jonathan Kraft, and former Chief Administrative Officer, William O'Donnell:

1. Paid me less than my similarly-situated male colleagues, and refused to provide information on the gender pay gap to Congress as required;
2. Refused to provide me with necessary administrative support, while hiring administrative assistants and providing consistent and adequate personnel funding for my similarly-situated male colleagues;
3. Restricted my communication channels and forced me to communicate indirectly through assistants;
4. Denied me of flexibility in my work schedule, while granting such flexibility to my similarly-situated male colleagues;
5. Gave preferred work opportunities to my similarly-situated male colleagues;
6. Minimized my team's purpose at the Agency;
7. Removed me from my position with the Agency.

Background.

1. The Architect of the Capitol (the "Agency") is the legislative branch agency responsible for the maintenance, operation, and development of the United States Capitol.

2. From November 9, 2021 until September 26, 2023, I served as the Director of Legislative and Public Affairs for the Agency.
3. In my position, I managed the Legislative and Public Affairs team, which consisted of 13 full-time employees.
4. On a daily basis, I prepared and reviewed all external and internal communications, including communications between the Agency and members of Congress, the public, and the press.
5. When I first interviewed for the position, I met with congressional staffers to learn more about the current relationship between Congress and the Agency. I discovered that, due to improper and disrespectful behavior on the part of Agency personnel, many members of Congress, and their staffers, had a strained relationship with the Agency.
6. As the newly-selected Director of Legislative and Public Affairs, I intended to do my part to repair the Agency's reputation.
7. From my first day of work, on November 9, 2021, until February 2023, my first-line supervisor was Architect of the Capitol, Brett Blanton.
8. Throughout Blanton's tenure with the Agency, he perpetuated a sexist environment by refusing to acknowledge and or respond to sexist and disrespectful behavior towards women.
9. He allowed my similarly-situated male colleagues, including O'Donnell, Baltimore, and Kraft, to talk over women during meetings, drop women from pertinent email chains, and exclude women from important conversations.
10. Blanton declined to discipline my similarly-situated male colleagues even when presented with evidence of their wrongdoing.

11. The workplace under Blanton's leadership was a corrupt and unjust place, for reasons beyond just his treatment of women.
12. On October 26, 2022, the Agency's Inspector General released a report finding that Blanton had abused his authority, misused government property, and wasted taxpayer funds throughout his employment with the Agency.
13. Specifically, the report found that Blanton had used his government-issued vehicle for personal road trips, impersonated a police officer, been conspicuously absent from work the day of the January 6, 2022 riots, and offered his friends and family private tours of the Capitol when it was closed to the public during the coronavirus pandemic.
14. In the months following the release of the report, Blanton sought to cover his tracks; however, his unethical and abusive behavior did not stop.
15. On February 7, 2023, prior to the State of the Union, I personally witnessed Blanton drinking alcohol in his office with his wife and his friend. He was supposed to be on duty as a constitutional officer.
16. On February 9, 2023, Blanton testified before the Committee on House Administration. Blanton called me later that evening and talked for hours. He tried to offer future inducements to me as a perk of the job – something I could “look forward to in the future” for the next State of the Union. During the same conversation, Blanton disclosed confidential information about a Democratic member of Congress's interaction with Capitol police.
17. The next day, I reported my concerns about Blanton to the House and Senate. I described the inappropriate behavior Blanton had exhibited during the State of the Union and the confidential information he had provided to me two days after.

18. I told the House and Senate that I believed Blanton's refusal to resign was having a negative effect on the Agency's operations.
19. Three days later, on February 13, 2023, President Joe Biden removed Blanton from federal service.
20. From then on, from February 2023 until September 2023, my first-line supervisor was Acting Architect of the Capitol, Chere Rexroat.
21. I had high hopes that, under Rexroat's leadership, the sexism and corruption would end.
22. However, I quickly realized that that would not be the case.
23. Rexroat restricted my communication channels by forcing me to communicate with her indirectly through her assistants. Rexroat did not ask any of my similarly-situated male colleagues to communicate this way.
24. Rexroat denied me of flexibility in my work schedule by keeping me on the phone with her until the late hours of the night and rejecting my requests to telework. Meanwhile, Rexroat allowed my similarly-situated male colleague, Baltimore, to relocate to California.
25. On many occasions, Rexroat gave preferred work opportunities to my similarly-situated male colleagues by ignoring my proposed communications to Congress and the media, while approving the requests of my similarly-situated male colleague, Legislative and Public Affairs Deputy Director, Sam Franco.
26. Further, on one occasion, Rexroat re delegated my invitation to participate on a panel to my similarly-situated male colleague, then-House Superintendent, Kirk Nelson, without explanation.

27. Rexroat also minimized my team's purpose at the Agency by continuously insinuating that the Legislative and Public Affairs team was somehow separate and apart from the Agency. She went as far as to remove my team's offices from being located within the Capitol.
28. In July of 2023, my work environment became so hostile that I reported my concerns regarding Rexroat's treatment of me to the Agency's Office of Diversity, Inclusion, and Dispute Resolution confidential hotline (on July 11, 2023 and July 17, 2023).
29. Despite requesting a response, I never received any communications addressing my concerns about Rexroat.
30. On September 22, 2023, I reported my concerns regarding Rexroat to the Office of Congressional Workplace Rights. I had an interview scheduled for September 26, 2023.
31. On September 26, 2023, Rexroat removed me from my position with the Agency and did not provide me with a reason.
32. I believe the Agency removed me from my position because I am a woman and because I reported the sexist and corrupt behaviors that I witnessed.
33. Throughout my time working for the Agency, there were many times when I blew the whistle regarding inappropriate and illegal conduct that I witnessed first-hand.
34. Following the January 6, 2021 riots, when congressional staffers attempted to intervene with the Agency's implementation of security, I pushed back against those staffers. Both Democrat and Republican members of Congress sought access to confidential security information pertaining to the damage caused by the riots; however, I ensured that such information was not disclosed.

35. When members of Congress and their staff members attempted to allow private sponsors to fund the delivery of Christmas trees to every Congressional office, in violation of the Antideficiency Act, I reported it to the Agency's Inspector General.
36. When former Speaker McCarthy's staff requested that trees from the Capitol grounds and Agency labor be used to manufacture wooden gavels to give to then-Speaker McCarthy, in violation of the Antideficiency Act, I reported it to Baltimore, the Agency's General Counsel. Despite full knowledge that the actions violated statute, Rexroat approved the production of the gavels.
37. When Senate Republican staffers asked for free food tastings from Agency restaurant vendors, in violation of the Antideficiency Act, I reported it to Baltimore.
38. When a former Senate Democratic staffer requested that I approve immediate work on construction projects that had not gone through the official approval process, I brought these unethical requests to Blanton's attention.
39. When Blanton and Rexroat refused to provide documents, such as the Statement of Disbursements and the Contingent Liabilities Report, to both the Senate and House as required by statute and requested by congressional staffers, I raised concerns within the Agency to Blanton, Rexroat, Kraft, and Baltimore.
40. Although I no longer work for the Agency, the sexism and corruption that pervaded the environment still affect me to date.
41. Four of my former similarly-situated male colleagues, Bahm, Baltimore, Kraft, and O'Donnell recently filed lawsuits that make false allegations against me.
42. Specifically, these four men claim that my complaints about the sexist environment they perpetuated and benefited from played a role in their subsequent terminations.

43. These allegations only further support my claims of discrimination.

The Agency paid me less than my similarly-situated male colleagues and refused to provide information on the gender pay gap to Congress, as required.

44. As Director of Legislative and Public Affairs, my position fell within the Office of the Architect. The Office of the Architect consists of a C-Suite of executives and office heads that provide oversight and direction to the Agency.

45. When I was first hired by the Agency, I was one of only three women to work in the C-Suite.

46. All three women earned less than our similarly-situated male colleagues.

47. I became aware of the gender pay gap through my review of the Agency's Statement of Disbursements – a report detailing the Agency's quarterly expenditures.

48. I attempted to address my concerns regarding the gender pay gap with Architect Blanton and Bahm during a meeting in early 2022. They were unreceptive to my concerns.

49. Blanton further perpetuated the gender pay gap by refusing to provide the Statement of Disbursements to both the House and Senate, as required by law. Such a statement would have showed the pay disparity between male and female leaders of the Agency, as well as salary information for all personnel. During his tenure, Blanton only supplied the Statement of Disbursements to the House.

50. When I spoke up about the need to provide the document to the Senate, Kraft and Baltimore voiced their objections.

51. Blanton never provided the Statement of Disbursements to the Senate.

52. Throughout Blanton's tenure, Blanton and Bahm maintained that higher male salaries were justified because the men had been in their positions for longer.

53. However, when Joe DiPietro first joined the Agency in February 2023, his salary was set higher than all of his similarly-situated female colleagues who had been with the Agency for years, including me and the female Acting Architect, Rexroat.

54. The gender pay gap continued under Rexroat's tenure.

55. Rexroat refused to provide the Statement of Disbursements to the Senate, despite the Senate's requests that she do so.

56. Rexroat also required me to seek her approval for compensation for any extra hours worked ("credit hours"), creating a new process specifically for me outside of any established policies or practices. My similarly-situated male colleagues were not required to obtain approval for credit hours.

The Agency refused to provide me with necessary administrative support, when hiring administrative assistants and larger staff teams for my similarly-situated male colleagues.

57. On numerous occasions, I expressed my need for an administrative assistant to assist me with basic human resources needs and timekeeping functions. All of my similarly-situated male colleagues had such administrative assistance.

58. However, the Agency refused to provide me with an administrative assistant.

59. Instead, the Agency provided me with a temporary detail who lacked the requisite IT permissions to perform the functions I needed assistance with. When the detail ended, I had no administrative support at all.

60. In early 2023, my similarly-situated male colleague, Bahm, and I, each requested an administrative assistant as part of the Agency's FY24 Annual Budget Requests.

61. While the Agency immediately approved Bahm's request, the Agency denied mine.

The Agency told me that there was insufficient FY23 funding available, and that FY24 funding was too uncertain.

62. However, on May 11, 2023, DiPietro admitted, via email, that “excess payroll funds” existed for FY23.

63. Additionally, on July 27, 2023, Rexroat delivered a report to Congress indicating the Agency’s intent to reprogram over \$6 million dollars in payroll funds.

64. The lack of administrative support caused confusion and recurring errors regarding timekeeping and personnel file management for the entire Legislative and Public Affairs team under my leadership.

65. In September of 2023, I contacted the Agency ombudsmen for support on this issue. The Agency ombudsmen acknowledged the confusing status and offered support.

The Agency denied me of flexibility in my work schedule, but granted such flexibility to my similarly-situated male colleagues.

66. Throughout my employment, the Agency expected me to work long hours, primarily in-person, while granting flexibility to my similarly-situated male colleagues.

67. Blanton and Rexroat both made a practice out of calling me late in the evening and keeping me on the phone for hours.

68. Rexroat, specifically, would call me late at night, while I was already home with my family, and require that I assist her with rehearsing her testimony for congressional hearings. One time, she required me to stay at my desk for hours while she had the computer read out proposed testimony to her and her husband.

69. The Agency never offered me any credit hours, or additional compensation, for the after-hours support I provided to Blanton and Rexroat.

70. Along those same lines, I was only permitted to telework two-days per week, while my similarly-situated male colleagues were granted more flexibility.

71. Furthermore, my ability to telework, when necessary for personal family matters, was continually limited in comparison to what was offered to my similarly-situated male colleagues.

72. When my mother-in-law was dying, Rexroat chastised me for requesting telework, but allowed my similarly-situated male colleague, Baltimore, to telework from California for 6 months or longer while was caring for his sick in-laws.

The Agency retaliated against me when my similarly-situated male colleagues accused me of discrimination.

73. On April 7, 2023, the Agency removed four of my similarly-situated male colleagues: Bahm, Baltimore, Kraft, and O'Donnell from their positions with the Agency.

74. All four men subsequently filed lawsuits against the Agency, alleging that I had discriminated against them throughout their employment.

75. The Agency learned of these lawsuits in or around June 2023.

76. From June 2023 until September 26, 2023, Rexroat's discriminatory behavior towards me intensified.

77. I believe her preference for men caused her to retaliate against me for the claims of my similarly-situated male colleagues.

The Agency restricted my communication channels and forced me to communicate indirectly through assistants.

78. From June 2023 until September 26, 2023, Rexroat declined to speak with me directly, and forced me to communicate with her through her assistants.

79. She made it a requirement for me to attend daily meetings with her assistants.

80. My similarly-situated male colleagues were not required to attend these meetings, or to communicate with Rexroat through her assistants. They were allowed to speak with Rexroat directly.

The Agency gave preferred work opportunities to my similarly-situated male colleagues.

81. From June 2023 until September 26, 2023, Rexroat ignored and denied many of my proposed communications to Congress and the media, while approving the requests of my similarly-situated male colleague, Legislative and Public Affairs Deputy Director, Sam Franco.

82. On July 26, 2023, I was invited to speak on a panel about the role House staffers can play in maximizing the Agency's operations. I had given this same presentation in 2022. When I brought the opportunity to Rexroat's attention, on August 16, 2023, she re delegated my presentation to my similarly-situated male colleague, then-House Superintendent, Kirk Nelson, without explanation.

The Agency minimized my team's purpose at the Agency.

83. From June 2023 until September 26, 2023, Rexroat sought to limit my team's purpose at the Agency.

84. In June of 2023, Rexroat emailed me stating: "LPA attendance at any of my meetings must be confirmed and approved first."

85. Following this email, Rexroat excluded me and my team from preparations relating to a bicameral hearing. She also excluded me and my team from preparation relating to a hearing on security.

86. As the Legislative and Public Affairs team, it was our responsibility to assist with preparations for such communications.

87. On another occasion, Rexroat emailed me stating: “You are speaking on behalf of LPA not AOC,” insinuating that my team, which is located within the Agency, is somehow separate and apart from the Agency.
88. Her attempts to separate my team from the Agency were targeted and not in line with previous practices.
89. Near the end of my employment, Rexroat changed existing policy in order to authorize Agency employees to engage with congressional staffers on policy matters without first coordinating with my team.
90. At the end of June 2023, Rexroat forced me to include her on all emails sent by Legislative and Public Affairs staff members to Congress. She also insisted on reviewing each email prior to transmission, at times making small editorial changes.
91. On September 19, 2023, during a meeting with Rexroat and Legislative and Public Affairs Deputy Director, Sam Franco, Rexroat became angry when I tried to discuss revised position descriptions, given the impact her new requirements were having on my role and the entire Legislative and Public Affairs team.
92. Rexroat ended the meeting abruptly stating that the Legislative and Public Affairs team needed to vacate the existing office space in the Capitol. She stated that she did not have a new space identified for our team, but that Franco would be allowed to remain in the Capitol.
93. In an email later that day, Rexroat confirmed that I would be moving with the rest of the team to a new space in the basement of the Ford Building, a large open room previously used for training.

The Agency removed me without warning or explanation.

94. On September 22, 2023, I complained to the Office of Congressional Workplace Rights about the discrimination and harassment the Agency had subjected me to. I had a meeting with OCWR scheduled for September 26, 2023.
95. However, on September 26, 2023, Rexroat removed me from my position with the Agency and did not provide me with a reason.

REMEDIES:

In resolution of my claims, I am seeking the following remedies:

- a. Reinstatement;
- b. Backpay;
- c. Lost benefits;
- d. Compensatory damages in the amount of \$300,000;
- e. Attorney's fees and costs.

Christine Leonard

Date