

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

WILLIAM O'DONNELL,
5114 LAVERY COURT
FAIRFAX, VA 2203

Plaintiff,

v.

Case No. _____

CHERE REXROAT, ACTING ARCHITECT
OF THE CAPITOL
SB- 15 U.S. Capitol Building
Washington, DC 20515,

Serve:

Chere, Rexroat, Acting Architect
of the Capitol
SB-15 US Capitol Building
Washington, DC 20515,

United States Attorney's Office
for the District of Columbia,
Attn: Civil Process Clerk
555 4th St., NW
Washington, DC 20530,

Merrick B. Garland, Attorney General,
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001,

Defendants.

**CIVIL COMPLAINT FOR EQUITABLE AND
MONETARY RELIEF AND DEMAND FOR JURY TRIAL**

Plaintiff William O'Donnell brings this complaint against Defendant the Architect of the Capitol ("AOC") for violating Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* ("Title VII"), the Age Discrimination in Employment Act, 29 U.S.C. § 621 *et seq.* ("ADEA"), as applied by the Congressional Accountability Act of 1995 ("CAA"), as amended by the CAA 1995 Reform Act of 2018. 2 U.S.C. § 1311 *et seq.*, when it terminated O'Donnell.

JURISDICTION AND VENUE

1. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because it asserts claims that arise under the laws of the United States, specifically Title VII, USERRA, and ADEA.

2. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) because the Defendants' headquarters are in this judicial district and the alleged violations took place in this judicial district.

PARTIES

3. Plaintiff is domiciled in Fairfax, Virginia and was employed by the AOC as the Chief Administrative Officer ("CAO").

4. O'Donnell is an "employee" as defined by 42 U.S.C. § 2000e and a "covered employee" pursuant to the CAA at 2 U.S.C. § 1301(3)(F).

5. Defendant is the federal agency responsible for the maintenance, operation, development, and preservation of the United States Capitol Complex, with its headquarters located at SB-15 U.S. Capitol, U.S. Capitol Building, Washington, DC 20515.

6. The AOC is an "employer" as defined by 42 U.S.C. § 2000e and an "employing office" pursuant to the CAA at 2 U.S.C. § 1301(9)(D).

FACTUAL ALLEGATIONS

7. O'Donnell is a 59-year-old white male residing in Fairfax, VA. He served in the Navy for nine years before transitioning to civilian Department of the Navy and Department of Defense work until 2019.

8. O'Donnell started working for AOC in 2019 as the CAO, and his direct supervisor as CAO was initially Tom Carroll, acting Architect of the Capitol, and then Brett Blanton, the Architect of the Capitol.

9. O'Donnell performed well at AOC and had no disciplinary record.

10. O'Donnell met on a regular basis with Blanton as well as other members of the AOC executive cadre including Erin Courtney, the acting director of legislative affairs, in his capacity as CAO. As part of his CAO duties and responsibilities O'Donnell served as the Architect's principal administrator, overseeing logistical functions, information technology, Capitol Curator, and human resources, among other administrative duties.

11. In or about November of 2020 the AOC hired Christine Leonard as its Director of Legislative and Public Affairs (LPA).

12. The LPA s director position is influential as it allows for one person to manage both public communications as well as communications with staffers for the Senate Committee on Rules & Administration and the House Committee on House Administration, which typically make decisions for the AOC that the Architect usually must follow. The director of legislative and public affairs meets daily with the Architect.

13. Courtney onboarded Leonard as the outgoing acting director and then became her direct report, resuming her permanent position as public affairs officer until she resigned in or about February of 2021.

14. Leonard asked Courtney during the onboarding process why the AOC employed so many military veterans. Courtney replied that the Office of Personnel Management favors veterans in the hiring process and that many military veterans possess the prerequisite skills for many AOC positions.

15. Leonard regularly and critically pointed out to Courtney that she believed there were too many white male veterans in executive positions at the AOC after Courtney began reporting to Leonard.

16. Leonard also regularly complained to Mary Jean Pajak, the AOC's deputy chief of staff, about O'Donnell, AOC General Counsel Jason Baltimore, and AOC Chief Financial Officer Jonathan Kraft, criticizing their use of military language and opining that they engaged in "mansplaining" during work meetings.

17. Leonard even asked Blanton to terminate Kraft in a meeting with Chief of Staff Pete Bahm and Blanton, but Blanton refused.

18. Complaints against Leonard by her reports began as soon as she began as LPA. Deputy general counsel Angela Freeman and Courtney both noted that the LPA office experienced higher turnover under Leonard.

19. In addition, multiple employees alleged that Leonard had discriminated against them on multiple bases, particularly on the basis of sex. Leonard resented men in positions of authority above her in rank and routinely demeaned women who served under her, including Courtney, Julie Agarwal, and others.

20. In or about January of 2022, Agarwal filed an OCWR complaint against AOC, alleging that Leonard discriminated against her on multiple bases, including gender.

21. In or about May of 2022, an anonymous review of AOC as an employer on the website Glassdoor accused Leonard of, among other complaints, discriminating against her female reports.

22. This review prompted an external counsel hired by AOC named Christine Cooper to conduct an investigation into Leonard based on the allegations in the Glassdoor review. The investigation was closed with inconclusive results in or about September of 2022.

23. In or about December of 2022, Leonard asked Blanton if the AOC might respond to the Glassdoor review noting that the allegations in the review were not substantiated. Blanton initially agreed but then advised Leonard that he would need to ensure that the decision was compliant with AOC laws and regulations.

24. Because other investigations and processes, such as the Agarwal complaint, had not been resolved, Baltimore's legal review of the action concluded that the AOC could not respond to the Glassdoor review. O'Donnell agreed with Baltimore's legal conclusion on the basis of AOC internal rules and AOC best practices, and so Blanton told Leonard that the AOC could not respond to the Glassdoor review because of Baltimore's legal advice and O'Donnell's concurrence.

25. In addition, the Senate Rules staffers, as well as the head of the Office of Inspector General, Chris Failla, frequently asked the AOC for information regarding OCWR complaints and sexual harassment complaints, including personally identifiable information ("PII").

26. Baltimore and O'Donnell, in conjunction with head of human resources Teresa Bailey, declined to compromise the integrity of the complaint process by turning over the information, consistent with AOC rules, human resources regulations, and federal privacy law.

27. Failla responded to Baltimore and O'Donnell's refusals with increasing hostility.

28. On or about February 13, 2023, Leonard asked Bahm to advise her as to which AOC employment positions served "at will" as opposed to being civil service. Bahm responded that all AOC executives served at the pleasure of the Architect. This conversation occurred while Leonard was answering questions from Senate Rules staff member Nichole Kotchwar.

29. On or about February 13, 2023, President Joe Biden fired Blanton over a series of ethical violations involving impersonating a police officer, appropriating a public vehicle for private purposes, giving private tours of the Capitol, among other violations. O'Donnell had no advance knowledge of these allegations and learned about them at the same time as the public.

30. Chere Rexroat, the chief engineer, was named acting architect in or about March 2023.

31. On or about March 3, 2023, the Office of Inspector General published a memo stating that 17 AOC employees had knowledge of Blanton's violations from the General Services Administration but failed to notify the Office of the Inspector General. O'Donnell was falsely implicated in this report.

32. Upon information and belief, Leonard and others at AOC circulated a list of executives to terminate.

33. On or about April 6, 2023, Rexroat advised O'Donnell that she was terminating his employment, effective immediately. Rexroat told O'Donnell that she could not tell him why she was doing so. Rexroat also fired Bahm, Kraft, and Baltimore that same day.

34. In response to being advised of his termination, O'Donnell opted to retire, and subsequently his retirement date was set for May 31, 2023.

35. Bailey, typically involved in any employment decision as the head of human resources, was not informed of any of the executives' terminations.

36. Rexroat terminated all four of the executive-level, veteran men members of the AOC C-Suite. Three out of the four men are white, all four are veterans, and all are over 40 years old. The remaining four female executives were not terminated, including chief security officer Val Hasberry, who had been implicated in the March 2023 OIG report.

37. Later that day, a reporter for The Hill contacted Kraft for a comment on the articles they were about to publish about the four men's termination. The reporters advised that they were supplied a draft email that Rexroat would send to all AOC staff following the terminations. The email implied that O'Donnell, Bahm, Kraft, and Baltimore were implicated in Blanton's wrongdoing and jeopardized the AOC's accountability in partnership with Congress.

38. The AOC's public affairs office, headed by Leonard, as well as the Senate Rules Committee staffers who worked with her, leaked the email to the press before it was even sent out to its intended recipients.

39. Because of the leaked internal email falsely implicating O'Donnell in Blanton's wrongdoing, The Hill and Roll Call published articles on or about April 7, 2023, unwittingly publishing false information about O'Donnell and gravely damaging his reputation.

40. O'Donnell requested administrative leave until his retirement date as well as severance pay, both typical practices of AOC. However, AOC denied both requests, forcing O'Donnell to deplete his paid leave.

41. AOC did not give O'Donnell permission to host a retirement party. Instead, he and some co-workers briefly met at a bar to celebrate O'Donnell's retirement. O'Donnell later learned that AOC-OIG had opened an investigation into these co-workers.

42. As the result of AOC's illegal actions, O'Donnell sustained mental anguish and economic damages, and he will continue to sustain damages into the future.

COUNT I
Discrimination Based on Race
Title VII of the Civil Rights Act of 1964
2 U.S.C. § 1311

43. O'Donnell hereby incorporates the allegations set forth in the foregoing paragraphs as though fully alleged herein.

44. O'Donnell is an "employee" as defined in 42 U.S.C. § 2000e(f) (Title VII).

45. O'Donnell is a "covered employee" pursuant to the Congressional Accountability Act of 1995, 2 U.S.C. § 1301(3)(F) and 2 U.S.C. § 1301(4).

46. The AOC is an "employer" as defined by 42 U.S.C. § 2000e (Title VII).

47. The AOC is an "employing office" pursuant to the Congressional Accountability Act of 1995, 2 U.S.C. § 1301(9)(D).

48. The AOC violated Title VII, as incorporated with respect to the AOC by the Congressional Accountability Act (CAA), by discriminating against O'Donnell, based on his race, when it terminated his employment.

49. The AOC's stated reasons for terminating O'Donnell are pretext for its unlawful race discrimination.

50. O'Donnell sustained substantial monetary and non-monetary damages as the result of the AOC's conduct.

COUNT II
Discrimination Based on Sex
Title VII of the Civil Rights Act of 1964
2 U.S.C. § 1311

51. O'Donnell hereby incorporates the allegations set forth in the foregoing paragraphs as though fully alleged herein.

52. O'Donnell is an "employee" as defined in 42 U.S.C. § 2000e(f) (Title VII).

53. O'Donnell is a "covered employee" pursuant to the Congressional Accountability Act of 1995, 2 U.S.C. § 1301(3)(F) and 2 U.S.C. § 1301(4).

54. The AOC is an "employer" as defined by 42 U.S.C. § 2000e (Title VII).

55. The AOC is an "employing office" pursuant to the Congressional Accountability Act of 1995, 2 U.S.C. § 1301(9)(D).

56. The AOC violated Title VII, as incorporated with respect to the AOC by the Congressional Accountability Act (CAA), by discriminating against O'Donnell, based on his sex, when it terminated his employment.

57. The AOC's stated reasons for terminating O'Donnell are pretext for its unlawful sex discrimination.

58. O'Donnell sustained substantial monetary and non-monetary damages as the result of the AOC's conduct.

COUNT III
USERRA
38 U.S.C. § 4311(a)
Discrimination

59. O'Donnell hereby incorporates the allegations set forth in the foregoing paragraphs as though fully alleged herein.

60. O'Donnell performed service in the United States Navy.

61. AOC was motivated by the fact that he had served in the United States Navy when it terminated his employment.

62. O'Donnell lost a benefit of employment when AOC removed him from federal service.

63. O'Donnell's former membership in a uniformed service of the United States was a substantial or motivating factor in AOC's decision to remove O'Donnell.

64. O'Donnell sustained substantial monetary and non-monetary damages as the result of the AOC's conduct.

COUNT IV
The Age Discrimination in Employment Act
29 U.S.C. §§ 621 *et seq.*
Discrimination

65. O'Donnell hereby incorporates the allegations set forth in the foregoing paragraphs as though fully alleged herein.

66. O'Donnell is over 40 years old.

67. The ADEA makes it unlawful for an employer "to discharge any individual . . . because of such individual's age." 29 U.S.C. § 623(a)(1).

68. AOC's decision to remove O'Donnell was based on his age.

69. AOC's stated reasons for its action are pretextual.

70. O'Donnell sustained substantial monetary and non-monetary damages as the result of the AOC's conduct.

COUNT V
Retaliation
Title VII of the Civil Rights Act of 1964
2 U.S.C. § 2000e-3

71. O'Donnell hereby incorporates the allegations set forth in the foregoing paragraphs as though fully alleged herein.

72. O'Donnell is an "employee" as defined in 42 U.S.C. § 2000e(f) (Title VII).

73. O'Donnell is a "covered employee" pursuant to the Congressional Accountability Act of 1995, 2 U.S.C. § 1301(3)(F) and 2 U.S.C. § 1301(4).

74. The AOC is an "employer" as defined by 42 U.S.C. § 2000e (Title VII).

75. The AOC is an “employing office” pursuant to the Congressional Accountability Act of 1995, 2 U.S.C. § 1301(9)(D).

76. O’Donnell conducted protected activity under Title VII when he protected the integrity of the AOC complaints process by refusing to provide PII of involved parties to the Senate staffers and the OIG.

77. O’Donnell also conducted protected activity when he opted to deny Leonard’s request to respond to the Glassdoor review accusing her of discrimination.

78. The AOC illegally retaliated against O’Donnell, based on his protected activity, when it terminated his employment on April 6, 2023.

79. The AOC’s stated reasons for terminating O’Donnell are pretext for its unlawful retaliation.

80. O’Donnell sustained substantial monetary and non-monetary damages as the result of the AOC’s conduct.

PRAYER FOR RELIEF

Based on the foregoing, O’Donnell respectfully requests that he be awarded the following relief against the AOC:

- a. Reinstatement or, in lieu thereof, full front pay and benefits;
- b. Economic damages for lost compensation and benefits and damages to O’Donnell’s career, reputation, and earning capacity in an amount to be determined;
- c. Compensatory damages, including but not limited to pain and suffering, emotional distress and reputational damage;
- d. Injunctive and declaratory relief;
- e. Reasonable costs and experts’ and attorneys’ fees; and

- f. Any other such relief that a court may deem just and equitable.

Respectfully submitted,

/s/ Anita M. Chambers

R. Scott Oswald, D.C. Bar No. 458859

Anita Mazumdar Chambers, D.C. Bar No. 1046845

D.C. Bar No. 1046845

The Employment Law Group, P.C.

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(202) 261-2821

(202) 261-2835 (facsimile)

soswald@employmentlawgroup.com

achambers@employmentlawgroup.com

Counsel for William O'Donnell

CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)

<p>I. (a) PLAINTIFFS WILLIAM O'DONNELL</p> <p>(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>Fairfax</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p>	<p>DEFENDANTS ARCHITECT OF THE CAPITOL</p> <p>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small></p>
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<p>(c) ATTORNEYS (FIRMNAME, ADDRESS, AND TELEPHONE NUMBER) The Employment Law Group, P. C. 1717 K St. NW, Suite 1110 Washington, DC 20006 (202) 261-2830</p>	<p>ATTORNEYS (IF KNOWN) Anita Mazumdar Chambers (achambers@employmentlawgroup.com) R. Scott Oswald (soswald@employmentlawgroup.com)</p>
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<p>II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY)</p> <p><input type="radio"/> 1 U.S. Government Plaintiff <input checked="" type="radio"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="radio"/> 2 U.S. Government Defendant <input type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY!</p> <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="radio"/> 4</td> <td style="text-align: center;"><input type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="radio"/> 5</td> <td style="text-align: center;"><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="radio"/> 6</td> <td style="text-align: center;"><input type="radio"/> 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4	Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
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Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6																				

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<p><input type="radio"/> A. Antitrust</p> <p><input type="checkbox"/> 410 Antitrust</p>	<p><input type="radio"/> B. Personal Injury/Malpractice</p> <p><input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability</p>	<p><input type="radio"/> C. Administrative Agency Review</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><u>Social Security</u> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))</p> <p><u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)</p>	<p><input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction</p> <p>Any nature of suit from any category may be selected for this category of case assignment.</p> <p>*(If Antitrust, then A governs)*</p>
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<p><input type="radio"/> E. General Civil (Other) OR <input type="radio"/> F. Pro Se General Civil</p>			
<p><u>Real Property</u> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property</p> <p><u>Personal Property</u> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability</p>	<p><u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 27 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement</p> <p><u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)</p>	<p><u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p> <p><u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other</p> <p><u>Other Statutes</u> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 462 Naturalization Application</p>	<p><input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA) <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)</p>

<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input checked="" type="radio"/> H. Employment Discrimination <input checked="" type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="radio"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran’s Benefits <input type="checkbox"/> 160 Stockholder’s Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
 1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multi-district Litigation
 7 Appeal to District Judge from Mag. Judge
 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 42 U.S.C. § 2000e et seq. (“Title VII”), 29 U.S.C. § 621 et seq. (“ADEA”), 38 U.S.C. § 4311(a) for unlawful termination.

VII. REQUESTED IN COMPLAINT	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ _____	JURY DEMAND: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
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VIII. RELATED CASE(S) IF ANY	(See instruction)	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If yes, please complete related case form
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DATE: 10/5/2023	SIGNATURE OF ATTORNEY OF RECORD: /s/ Anita Mazumdar Chambers
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INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil coversheet. These tips coincide with the Roman Numerals on the cover sheet.

- I.** COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III.** CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV.** CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI.** CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII.** RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk’s Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Civil Action No. _____

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Printed name and title

Server's address

Additional information regarding attempted service, etc: