

INTRODUCTION

1. Fannie Mae is a privately-owned government sponsored enterprise that provides a secondary market in home mortgages by purchasing them from the lenders who originate the loans. Fannie Mae's Chief Executive Officer promotes the company as being "committed to maintaining the highest standards of business and professional conduct in everything we do." Contrary to its public message and its internal policies, Fannie Mae promotes a culture that mistreats women, including hiring and paying them to have sex with upper management, and tolerates illegal, extreme, and abhorrent sexual harassment.

2. King was a senior manager at Fannie Mae running the information technology ("IT") department which services Fannie Mae executives. He oversaw a number of employees. When King met plaintiff, she was a dancer at an adult entertainment establishment. Plaintiff wanted to change professions and embark upon a professional career. In July 2016, King offered plaintiff a way out of adult dancing and hired her to work in the department he supervised at Fannie Mae. King offered to mentor and train her. Unbeknownst to plaintiff, King was not interested in her work performance.

3. From the outset, King failed to treat plaintiff like the other employees. He limited her work and isolated her from the others in the group. King would verbally abuse plaintiff when she tried to socialize with other employees. He controlled every aspect of her day. Before long King began pulling plaintiff out of work to drink alcohol with him. King also did illicit drugs during their outings. Because of King's position at Fannie Mae, and her isolation from others, plaintiff feared losing her job if she did not cooperate with King's requests.

4. King escalated his abuse of plaintiff. During work hours, he brought plaintiff to hotels and demanded sex. He physically and verbally abused her. King threatened to fire plaintiff if she did not comply with his requests.

5. King's relationship with plaintiff was well known at Fannie Mae. The two would leave the office for hours at a time, and on several occasions for most of the day. King took plaintiff on "business" trips to Texas— although there was no business justification for doing so— which required approval from King's supervisor. During at least one trip, King sexually assaulted plaintiff in a hotel room. Plaintiff's colleagues regularly would question why she was not in the office working, but King always "took care of it." Fannie Mae knew about the relationship and covered for King. Plaintiff lived in constant fear of retaliation.

6. This continued until late Fall 2017, when plaintiff no longer could cope with King's abuse. Plaintiff feared for her safety. Plaintiff sought and received a protective order in which a court ordered King to have no contact with her. Only then did Fannie Mae terminate King.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction over this action pursuant to District of Columbia Human Rights Act under ("DCHRA") and D.C. Code §11-921.

8. This Court has personal jurisdiction over the defendants pursuant to D.C. Code §13-422 because Fannie Mae is headquartered and maintains its principal place of business in the District of Columbia and D.C. Code §13-423 because Fannie Mae and King caused tortious injury to plaintiff in the District of Columbia.

9. The District of Columbia is an appropriate forum because plaintiff and defendant King worked at the Fannie Mae District of Columbia headquarters, and the various causes of action arise out of conduct that occurred in the District of Columbia.

THE PARTIES

10. Plaintiff is a thirty-one-year old resident of Rockville, Maryland and is an employee of Fannie Mae at their headquarters in the District of Columbia.

11. Defendant Fannie Mae is a privately-owned government sponsored enterprise that provides a secondary market in home mortgages by purchasing them from the lenders who originate the loans. Fannie Mae is headquartered at 3900 Wisconsin Avenue, NW, Washington, D.C. 20016, and is an Employer under the DCHRA.

12. Defendant Joseph King resides in Hyattsville, Maryland and, at all times relevant to this Complaint, was an employee of Fannie Mae at their location in the District of Columbia. King was a high-ranking senior manager in the IT department of Fannie Mae and was plaintiff's direct supervisor.

FACTS

13. Plaintiff and King met at a gentlemen's club in the District of Columbia. Plaintiff was working there as a dancer. King was a patron of the club. King was dating plaintiff's co-worker.

14. Plaintiff told King she wanted to change careers and welcomed the opportunity to work at a large company with an opportunity to grow professionally.

15. King offered her a job in the executive IT department he supervised at Fannie Mae.

16. Although plaintiff lacked IT experience, King hired her to work at Fannie Mae for an annual salary of approximately \$82,000, plus bonuses. King said he would train and mentor her. Within a year of starting, plaintiff's annual salary was raised to approximately \$93,000.

17. From the outset, King treated plaintiff differently from the other employees he supervised. He limited her work assignments, discouraged her from talking to other employees, and made her work only with him.

18. King insisted plaintiff join him for lunch outside the office. During those lunches, King would order alcohol and pressure her to drink with him. King also would consume illicit drugs.

19. Plaintiff complied with King's demands because she feared losing her job. King repeatedly told plaintiff how close he was to his supervisor and other executives, and that he could do whatever he wanted at Fannie Mae. King also said he was being considered for a position as a Director at Fannie Mae. Given King's connections and her lack of connections at Fannie Mae, plaintiff feared retaliation.

20. During work hours, King would have plaintiff drink excessive amounts of alcohol. On some occasions, King would take plaintiff to a nearby hotel and demand that she have sex with him.

21. This type of behavior was ongoing. King was controlling, abusive (physically and verbally), and held plaintiff's job over her head if she did not do what he wanted.

22. Others at Fannie Mae knew of this inappropriate relationship. King would disappear with plaintiff during work hours on a regular basis for prolonged periods of time.

23. King' supervisor, Jeff Willis-Jones, Director of Workplace Operations, socialized with King. Willis-Jones approved unnecessary expenses and travel for King and plaintiff, and allowed King's repeated daytime absences with plaintiff and the other inappropriate conduct.

24. Despite plaintiff's expressed desire to advance her career at Fannie Mae, King refused to allow plaintiff the opportunity to prove herself. King created an environment where plaintiff's potential for growth was not possible, and whereby she remained entirely dependent on King.

25. Fannie Mae was aware or should have been aware of King's exploitation of plaintiff. Other employees of Fannie Mae pressed plaintiff about her lack of job specifications and absences during the day. King assured plaintiff that he would "take care of it."

26. King used his position as plaintiff's boss to pressure her into uncomfortable, inappropriate, and improper situations. On one "business" trip to Dallas, Texas, King sexually assaulted plaintiff in her hotel room.

27. Fannie Mae tolerated and fostered an environment where employees were given latitude to act improperly. King was able to hire and retain a presumptively unqualified employee to control and exploit her for sex. Fannie Mae turned a blind eye to plaintiff and King's unexplained extended absences from the workplace and their lack of productivity.

28. King acted in violation of Fannie Mae's code of conduct in innumerable ways, including, but not limited to, requesting sexual favors and repeatedly asking plaintiff out; using offensive sexual innuendoes; threatening plaintiff; making unwanted or offensive sexual advances toward or physical contact with plaintiff; and taking unfair advantage of plaintiff through manipulation and concealment.

29. King became increasingly demanding and controlling. Plaintiff repeatedly requested that King refrain from harassing her both in and out of the workplace, but to no avail.

30. When plaintiff refused to let him come to her residence, King convinced the management office to give him a key and illegally entered it.

31. On December 2, 2017, in fear of her safety, plaintiff obtained a Protective Order in the District Court of Montgomery County, Maryland on December 1, 2017, in which the court ordered that King have no contact with her.

32. Only then did Fannie Mae terminate King.

COUNT I

(Violation of DCHRA) **(Quid Pro Quo - Fannie Mae)**

33. Plaintiff incorporates and re-alleges the prior allegations as if fully set forth herein.

34. Plaintiff was an employee of Fannie Mae.

35. King made unwanted sexual advances toward plaintiff and engaged in other unwanted verbal and physical conduct of a sexual nature.

36. The job benefits were conditioned, by words or conduct, on plaintiff's acceptance of King's sexual advances and conduct.

37. The employment decisions affecting plaintiff were made based on her acceptance or rejection of King's sexual advances and conduct.

38. At the time of King's improper conduct, he was plaintiff's supervisor.

39. King's conduct was a substantial factor in causing plaintiff's harm.

40. As a direct and proximate result of defendant's wrongful conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish

and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

COUNT II

(Violation of DCHRA) **(Hostile Work Environment - Fannie Mae)**

41. Plaintiff incorporates and re-alleges the prior allegations as if fully set forth herein.

42. Plaintiff is a member of a protected class on account of her sex (female).

43. During the course of her employment at Fannie Mae, plaintiff was repeatedly subjected to unwelcome sexual harassment by King, who was her direct supervisor with immediate and complete authority over her.

44. This harassment was based on plaintiff's membership in the protected class (being female).

45. The harassment was sufficiently pervasive and severe as to alter the terms, conditions or privilege of plaintiff's employment by creating a threatening, oppressive, hostile, and offensive work environment which interfered with plaintiff's employment and well-being.

46. Fannie Mae knew or should have known about King's conduct and failed to prevent it.

47. As a direct and proximate result of defendant's wrongful conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

COUNT III

(Negligent Retention - Fannie Mae)

48. Plaintiff incorporates and re-alleges the prior allegations as if fully set forth herein.

49. Defendant Fannie Mae owed a duty to plaintiff to provide her with a safe work environment, free from battery, assault, and intentional infliction of emotional distress.

50. Fannie Mae breached that duty by failing to use reasonable care in retaining King as an employee and as supervisor of plaintiff.

51. Fannie Mae was aware, or should have been aware, of King's battery, assault, and intentional infliction of emotional distress of plaintiff.

52. As a direct and proximate result of Fannie Mae's conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

COUNT IV

(Negligent Supervision - Fannie Mae)

53. Plaintiff incorporates and re-alleges the prior allegations as if fully set forth herein.

54. Fannie Mae knew or should have known that King was acting in an improper, illegal, dangerous or otherwise incompetent manner through his conduct of battery, assault and intentional infliction of emotional distress of plaintiff.

55. With this actual or constructive knowledge, Fannie Mae failed to take reasonable precautionary measures in supervising King.

56. As a direct and proximate result of Fannie Mae's conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

COUNT V

(Battery - King)

57. Plaintiff incorporates and re-alleges the prior allegations as if fully set forth herein.

58. During plaintiff's employment, King intentionally, deliberately, and repeatedly touched, groped, fondled, and sexually assaulted plaintiff both during and after work hours, on "business" trips and elsewhere, in an unwelcome, harmful, offensive, or insulting way.

59. Plaintiff did not consent to King's conduct.

60. As a direct and proximate result of defendant's wrongful conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

COUNT VI

(Assault - King)

61. Plaintiff incorporates and re-alleges the prior allegations as if fully set forth herein.

62. King intentionally and unlawfully threatened and attempted to threaten to cause physical harm or offensive contact with plaintiff.

63. King had the ability to carry out the harmful or offensive contact.

64. King's conduct put plaintiff in reasonable apprehension of contact.

65. As a direct and proximate result of defendant's wrongful conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

COUNT VII

(Intentional Infliction of Emotional Distress - King)

66. Plaintiff incorporates and re-alleges the prior allegations as if fully set forth herein.

67. King acted with extreme and outrageous conduct by sexually exploiting, isolating, threatening, and assaulting plaintiff.

68. Through this conduct, King intended to cause, or acted with reckless disregard to cause, plaintiff emotional distress.

69. As a direct and proximate result of defendant's wrongful conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish

and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

COUNT VIII

(Punitive Damages - All Defendants)

70. Plaintiff incorporates the allegations in the prior paragraphs as if fully set forth herein.

71. King acted with evil motive, actual malice, deliberate violence and oppression, and with intent to injure, and in willful disregard for the rights of plaintiff.

72. King's conduct was outrageous or reckless toward the safety of plaintiff.

73. In allowing and ratifying King's actions while on actual or constructive notice, Fannie Mae acted with evil motive, actual malice, deliberate violence and oppression, and with intent to injure, and in willful disregard for the rights of plaintiff.

74. As a direct and proximate result of defendants' conduct, plaintiff has suffered and will continue to suffer pain and suffering, and extreme and severe mental anguish and emotional distress, including Post Traumatic Stress Disorder. Plaintiff has incurred and will continue to incur medical expenses for treatment by mental health providers, and other costs and expenses.

PRAYER FOR RELIEF

WHEREFORE, plaintiff requests the Court enter a judgment awarding:

- (a) Compensatory damages in the amount of \$10,000,000;
- (b) Punitive damages in the amount of 10,000,000;

- (c) Plaintiff's attorneys' fees and costs; and
- (d) And such other relief as is necessary and proper.

Respectfully submitted,

/s/ Ari S. Casper _____
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JURY DEMAND

Plaintiff demands a trial by jury on all issues triable to a jury.

/s/ Ari S. Casper _____
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