**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF COLUMBIA**

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**STEVEN SCHRAGE, )**

**211 Franklin Street, )**

**Alexandria, VA 22314, )**

 **)**

 ***Plaintiff*, )**

 **)**

**v. )**

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**COMMISSION ON SECURITY & ) Case No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**COOPERATION IN EUROPE, )**

**234 Ford House Office Building )**

**Washington, DC 20515, )**

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**Serve: Commission on Security & )**

 **Cooperation in Europe, )**

 **234 Ford House Office Building )**

 **Washington, DC 20515 )**

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**Rep. Joe Wilson, Chairman, )**

 **1436 Longworth House Office Building, )**

 **Washington, DC 20515, )**

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**United States Attorney's Office )**

**for the District of Columbia, )**

**Attn: Civil Process Clerk )**

**555 4th St., NW )**

**Washington, DC 20530, )**

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**Merrick B. Garland, Attorney General, )**

**950 Pennsylvania Avenue, NW )**

**Washington, DC 20530-0001, )**

 **)**

 ***Defendant*. )**

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

 Plaintiff Steven Schrage, through counsel, files this amended civil complaint and jury demand for violations of the Congressional Accountability Act, 2 U.S.C. § 1301 *et seq.,* (“CAA”), and 42 U.S.C. § 2000e *et seq*. (“Title VII”), as applicable to Defendant Commission on Security & Cooperation in Europe (“the Helsinki Commission,” “Commission,” or “CSCE”) as per the Congressional Accountability Act of 1995 (“CAA”), as amended by the CAA Reform Act of 2018, 2 U.S.C. § 1311 *et seq*.

**Jurisdiction and Venue**

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 2 U.S.C. § 1408(a) because it asserts claims that arise under the CAA.
2. On October 15, 2024, Plaintiff filed a timely claim under 2 U.S.C. § 1402 and has not submitted a request for a hearing on the claim. Therefore, Plaintiff is within the 70-days from October 15, 2024, to “file a civil action in a District Court of the United States with respect to the violation alleged in the claim” pursuant to 2 U.S.C. § 1401(b)(1).
3. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) because the Defendant’s headquarters is in this judicial district and the alleged violations took place in this judicial district.

**Parties**

1. Plaintiff was Defendant’s Executive Director/Staff Director at the time the claim arose and resides in Alexandria, Virginia.
2. Pursuant to 2 U.S.C. § 1301(b)(1), individuals employed by the Helsinki Commission are “covered employees” under the CAA.
3. Pursuant to 22 U.S.C. § 3008(d)(1), Plaintiff was, until his termination, a Congressional employee as an employee of Defendant.
4. Pursuant to 2 U.S.C. § 1301(b)(2), the Commission on Security & Cooperation in Europe, also known as the Commission or CSCE, is an “employing office” under the CAA.
5. Pursuant to 2 U.S.C. § 1408(b), the “employing office” shall be the defendant in a CAA civil action.

**FACTUAL ALLEGATIONS**

1. In early 2023, Jonathan Day, then the personal office Chief of Staff to Representative Joe Wilson of South Carolina, who also served as the Chairman of the Commission on Security and Cooperation in Europe (“Helsinki Commission,” “Commission,” or “CSCE”), recruited Plaintiff Steven P. Schrage, Ph.D., from his role at Johns Hopkins School of Advanced International Studies (“SAIS”) to be CSCE’s Staff Director. This occurred following Dr. Schrage’s anti-human trafficking and humanitarian work, including traveling to Ukraine’s border to volunteer in the days after Russia’s 2022 full-scale and active invasion of Ukraine.
2. On or about March 13, 2023, CSCE Chairman Wilson appointed Dr. Schrage as the Executive Director (legally “Staff Director”) of CSCE.
3. In contrast to Mr. Day’s description of CSCE, upon arriving, Dr. Schrage learned that the CSCE had experienced years of turmoil and controversy. Prominent news outlets covered stories concerning allegations of sexual harassment, abusive retaliation against claimants by CSCE lawyers, and efforts to silence those who reported such harassment and retaliation. This included reports that Co-Chairman Senator Ben Cardin authorized a $220,000 payment (that was kept secret from top CSCE officials and Commissioners) to a former Republican, African American staffer who complained of sexual mistreatment by a CSCE Commissioner. After this staffer made her complaint, the Washington Post reported the staffer also alleged Congressional attorneys representing CSCE (referencing Ann Rogers and Russell Gore from the House Office of Employment Counsel (OHEC)) and CSCE officials engaged in abusive behavior designed to undermine her legal rights.[[1]](#footnote-1) More specifically, they allegedly called the staffer a liar and an extortionist and took other actions during a mediation session, after which the staffer collapsed; sought to drag out her proceedings and expenses, causing her to lose her home; and attempted to deny this victim’s rights under the Congressional Accountability Act (CAA), alleging that CSCE staff were not covered by the CAA. However, the OHEC attorneys’ CAA arguments were rejected by several officials, including the former Chairman.
4. Following this incident, and its press coverage, Congress amended the CAA in 2018 to specifically state that any individual who is an employee of CSCE “shall be considered a covered employee” under the CAA, 2 U.S.C. § 1301(b)(1).
5. In March 2023, Dr. Schrage arranged an introductory dinner with Kyle Parker, the CSCE’s Senior Staff Representative for Co-Chairman Cardin, to encourage open and collaborative work. At this dinner, Mr. Parker told Dr. Schrage that he did not view Chairman Wilson as the full, legal CSCE Chairman; that Mr. Parker had authority to conceal from Chairman Wilson and other CSCE leaders actions he took or tasked the CSCE staff to do based on his long CSCE tenure; that he was not subject to Congressional ethics rules; that while he was a U.S. official and actively promoting himself as such in the media and generally, he routinely traveled “unofficially” without government authorization to Ukraine and actively encouraged other CSCE staff, such as Paul Massaro, to do the same; that while on these unofficial and unauthorized trips he wore foreign military gear, put U.S. elected officials’ names on bombs intended for Russia, and received gifts and lodging from Ukrainian officials and others; and that he had provided benefits for foreign officials and others (including, it was later discovered, potential Non-Government Organization (NGO) officials and lobbyists with interests before the U.S. government) who provided him aid in these unofficial trips. Dr. Schrage later learned that the benefits Mr. Parker provided on his unofficial trips to Ukraine included “brokering” a Washington Post article promoting a Ukrainian military official (who was fired shortly thereafter) and having his subordinates at CSCE push U.S. agencies to change export policies and regulations that appeared to benefit those who had personally provided Mr. Parker tens of thousands of dollars in cash.
6. Mr. Parker also asserted to Dr. Schrage that no one could “stop” him from these activities and that he had established special foreign “friends” of the CSCE, including Oleksiy Goncharenko, a Ukrainian politician seeking to replace President Zelenskyy, and Bill Browder, a prominent foreign financier who had renounced his U.S. citizenship, who were given special access to and influence over the CSCE.
7. Dr. Schrage found Mr. Parker’s statements disturbing, but stated that the most important thing was that they worked together collaboratively and transparently to advance the CSCE’s work consistent with legal requirements.
8. While Dr. Schrage conducted initial introductory meetings, several current and former staff informed Dr. Schrage of past and ongoing sexual and racial discrimination, antisemitism, and other unaddressed concerns and misconduct. Several staff expressed gratitude to Dr. Schrage, indicating they had not had such individual meetings where these issues could be privately raised, and expressed concern about raising them due to the lack of action on past complaints.
9. Concerns regarding current staff largely focused on Mr. Parker and Mr. Massaro, whom staff described as Mr. Parker’s protégé. Dr. Schrage learned that after then Chairman Cardin reappointed Mr. Parker as CSCE’s Staff Director in 2021, four of the top five most experienced CSCE staff left. This senior staff exodus had been predicted by the prior Democratic Chief of Staff, who departed in 2021 after warning Senator Cardin of Mr. Parker’s misconduct and conflicts with officials, including several of these senior staff who questioned his activities. This left almost no senior staff oversight and removed any guardrails around Mr. Parker. While the top two senior staff are independently appointed ever two years under the CSCE statute, Mr. Parker had remained in place through several staff cycles.
10. Concerns about serious CAA abuses grew after an early incident involving Mr. Parker and a woman whom several CSCE Commissioners approved to replace the former Communications Director, a longtime CSCE official who departed the Commission after Mr. Parker was appointed Staff Director in 2021, following her complaints regarding Mr. Parker (including Mr. Parker bullying her and saying “anyone could do her job”). The new woman Communications Director candidate emerged from a private initial meeting with Mr. Parker so disturbed that she immediately withdrew from the position, reported crying to her husband, and stating that she would never work with Mr. Parker.
11. After she did this, Mr. Day called Dr. Schrage, stated that he was shocked as he had known the woman for years, and demanded to know what happened. Mr. Day then instructed Dr. Schrage that due to this and the other staff reports of racial and sexual misconduct, especially involving Mr. Parker, the Congressional Accountability Act (CAA) imposed a legal obligation on the CSCE to promptly and thoroughly investigate the allegations of discrimination. Dr. Schrage repeatedly requested to have this investigation led by an outside entity to avoid disrupting CSCE operations and management, but Mr. Day refused.
12. Dr. Schrage then decided that he would task the incoming General Counsel, Michael Geffroy, a military war veteran who had served as chief counsel of a Congressional committee, to lead this investigation. After Mr. Geffroy had been approved for hiring by all four bipartisan Senate and House officials, Mr. Parker attempted to delay or block Mr. Geffroy’s hiring, slowing the start of the required CAA investigation.
13. Later, when Dr. Schrage asked Mr. Parker about the interaction with the woman Communications Director candidate, Mr. Parker said he could not recall anything specific about their meeting that would have upset her. Mr. Parker then told Dr. Schrage that he was concerned about this candidate joining CSCE because she said that she only wanted to work for Chairman Wilson, but the candidate and all other officials indicated Mr. Parker’s assertion was false.
14. Around this same time in spring of 2023, Dr. Schrage met with CSCE Commissioner Senator Roger Wicker’s then-Chief of Staff, who aggressively pushed Dr. Schrage to fire Mr. Massaro citing his actions, including traveling to Ukraine, promoting his personal meeting with President Zelenskyy during his unofficial travel, and advancing his personal positions on matters related to CSCE and U.S. issues on his widely-followed social media platform. Dr. Schrage indicated that he had been told that Mr. Parker, Mr. Massaro’s supervisor, took similar actions and encouraged Mr. Massaro to take such actions; so punishing Mr. Massaro for actions encouraged by Mr. Parker may not be fair until this was explored further.
15. Staff reported great concern to Dr. Schrage that Mr. Parker and Mr. Massaro were using their CSCE positions to promote private groups and unvetted individuals seeking to fight in Ukraine, taking extreme political positions, or linked to human rights abuses. It was later learned that, while Mr. Parker overseeing CSCE prior to Dr. Schrage’s arrival, attempted President Trump assassin Ryan Routh told the New York Times that he was in Washington, D.C., to meet “for two hours” with CSCE officials. The CSCE has not responded to requests for comments on this claimed meeting, and one Commissioner stated that his staff was told the CSCE had not found an official record of the meeting. Yet meetings with other groups flagged by staff were later confirmed, as well as CSCE (before and after Dr. Schrage’s tenure) hosting witnesses calling for extreme actions and using extreme rhetoric targeting President Trump and his supporters.
16. To ensure CSCE remained non-partisan and not weaponized for any party’s political goals, around this same time, Dr. Schrage instituted new witness vetting reviews to ensure any partisan (against Democrats or Republican) or controversial acts by witnesses were flagged. Almost immediately, this included flagging attempts by Mr. Massaro and Stephanie Pendarvis, a personal office staffer to Chairman Wilson who had expressed strong views opposing Trump, to feature as an official CSCE witness a Ukrainian national whom Mr. Massaro had invited onto his personal Youtube show, where the witness pushed a conspiracy theory that conservative commentator Tucker Carlson was paid foreign operative for Putin at the same time that Mr. Carlson was publicly working with the Republican Speaker of the House on high-profile investigative matters.
17. In or about May 2023, during an CSCE election observation mission in Turikye, Mr. Parker acted contrary to U.S. Ambassador guidance and in violation of election observation rules and local laws in ways that instigated an armed police incident. The U.S. Ambassador Jeff Flake and his top Regional Security Officer (RSO) had issued strong warnings to Mr. Parker when he insisted on traveling near the Iranian border, as that they felt this would put him and others at great risk, including two Turkish national security officials who would be forced to travel for several days away from their families following a devastating earthquake and be disenfranchised from voting in a potentially historic Turkish election in order to meet Mr. Parker’s demands. When Dr. Schrage approached Mr. Parker about the incident, Mr. Parker became belligerent and derided Dr. Schrage saying that he did not need to inform Dr. Schrage, Chairman Wilson, or CSCE’s Senate Commissioners of his actions due to his long CSCE tenure. Mr. Parker then attempted to block Dr. Schrage from an RSO briefing on CSCE security matters, where not only the concerns regarding Mr. Parker would be addressed, but also those related to a U.S. Congresswoman who was serving as an election observer and for whom Dr. Schrage was responsible.
18. When Mr. Parker refused to change his observation location despite the Ambassador’s and Dr. Schrage’s requests, and the fact that the site already had enough observers scheduled, Dr. Schrage instructed Mr. Parker and all other CSCE staff to notify him and the CSCE point of contact of immediately of any issues given the sensitivity and risks that had been flagged by the Embassy and officials overseeing the election monitoring. Despite this instruction, Dr. Schrage was not informed of any significant issues during election day.
19. The next morning following the election, the senior German official overseeing the mission pulled Dr. Schrage aside to ask if he was aware of Mr. Parker’s “fight with police.” Dr. Schrage was not, but then repeatedly attempted to contact Mr. Parker who did not respond or was unreachable.
20. When Dr. Schrage was finally able to see Mr. Parker at the airport the following day, Mr. Parker refused to respond to questions about this incident and stated that neither CSCE Staff Director Dr. Schrage nor CSCE Chairman Wilson had the right to know of his activities as a CSCE employee. Dr. Schrage informed Mr. Parker that if he refused to answer his questions, the incidents would have to be legally reviewed and investigated, but Mr. Parker still refused to cooperate.
21. Reports from U.S. and international officials later interviewed over several weeks documented that Mr. Parker’s actions provoked an angry mob of Turkish citizens and police surrounding Mr. Parker after he repeatedly refused to follow direct Turkish police and other officials’ instructions, including taking pictures and videos of voting areas while posting on social media. This incident was reportedly only defused by the intervention of the Embassy’s armed security officers who accompanied Mr. Parker at the Ambassador’s and RSO’s insistence after Mr. Parker refused to follow the Ambassador’s guidance. The Embassy security detail indicated that they felt they had to intentionally misrepresent photographs on Mr. Parker’s seized phone that showed Mr. Parker wearing military uniforms in Ukraine as a result of his being on official missions to intervene, as the Turkish police indicated they would take Mr. Parker and officials on the election observation mission him (including a Member of a European Parliament and a local translator who feared she would lose her job) to the local Turkish prosecutor.
22. While Dr. Schrage had decided to have the initial CAA investigation led by the incoming General Counsel, Michael Geffroy, given his legal background and experience, he had still not onboarded several weeks later due to actions by Mr. Parker, who took extraordinary steps to block Mr. Geffroy’s hiring and specifically indicated that he was concerned about the possibility the new General Counsel might review management issues. Mr. Parker continued these actions after learning that Mr. Geffroy quit his private sector job that he used to support his family to take the CSCE post he had already been approved for.
23. As part of this effort, Mr. Parker and Christopher Lynch, the Chief of Staff for Senator Cardin, asked CSCE’s Chief Administrative Officer to provide information that they then used to make false representations regarding the cost of Mr. Geffroy’s benefits to CSCE. As a veteran, Mr. Geffroy was entitled to separate military benefits not paid for by CSCE, but Mr. Parker and Mr. Lynch nevertheless pushed Chairman Wilson to rescind Mr. Geffroy’s offer or cancel the Cost of Living Adjustment (COLA) that Chairman Wilson promised to CSCE staff, which they surely knew would sour the staff’s relationship with Mr. Geffroy or limit Chairman Wilson’s ability to appoint staff.
24. After discovering this, Mr. Day asked Dr. Schrage to ask Mr. Parker about the rationale for holding off on the COLA adjustments for staff when there was ample budget to hire Mr. Geffroy and provide the COLA. When Dr. Schrage did so, Mr. Parker became enraged in front of staff and accused Dr. Schrage of misrepresenting Senator Cardin’s position by asking this question.
25. In June 2023, when Mr. Geffroy was onboarded, he and Dr. Schrage closely coordinated their initial CAA investigation with Mr. Day, and later with attorneys from OHEC including Russell Gore, Ann Rogers, and Kunti Salazar, who provided advice and edited documents and communications on this and related matters.
26. After Mr. Parker learned his actions were being reviewed by Dr. Schrage and Mr. Geffroy, he privately met with Senator Wicker and they reached a decision to remove Dr. Schrage and Mr. Geffroy from CSCE and discussed strategies to do so.
27. During the Spring and Summer of 2023, Dr. Schrage and Mr. Geffroy continually reported their findings and recommendations, along with the evidence they collected, to Chairman Wilson’s office and Mr. Day. This included their recommendation that CSCE refer potential criminal and national security matters to relevant outside agencies for review. The evidence Dr. Schrage and Mr. Geffroy compiled included a 2020 memorandum authored by a former Democratic CSCE Staff Director, who was African American and who served as Staff Director while Mr. Parker was on the CSCE as the Senate Co-Chairman’s senior staffer, officially notifying then-Chairman Cardin and Mr. Lynch of sexism (*e.g.*, Mr. Parker deriding efforts to include women as based on “what is swinging between one’s legs” and “un-American” and having CSCE’s most senior woman official cancel travel with Mr. Parker due to his loud discussion of a “ceramic cock”), racism (*e.g.*, Mr. Parker told CSCE’s only remaining African American staffer the first time he saw her in person that, “I never would have hired you”); antisemitism (with Jewish groups complaining about Mr. Massaro’s social media postings “boosting Holocaust perpetrators” and Mr. Massaro stating to a CSCE official at a wreath laying at the Dachau concentration camp that “Hitler wasn’t that bad.”), mismanagement, and corruption.
28. This 2020 memorandum should have triggered the CAA’s legal requirement to promptly investigate (as Dr. Schrage was instructed to do urgently following the staff reports of sexual and racial abuse by Mr. Parker). Yet, there is no evidence that such an investigation occurred before Senator Cardin, with the public backing of Senator Wicker, promoted Mr. Parker to be the CSCE Staff Director in 2020. This lack of investigation of the documented racism and sexism charges continued while Senator Cardin publicly served as the Organization for Security and Cooperation in Europe’s (OSCE’s) Special Representative for Racism, Sexism and Intolerance.
29. During the initial CAA investigation and in Dr. Schrage’s initial staff meetings, those whom Dr. Schrage and Mr. Geffroy interviewed expressed concern about a female staffer who previously prepared a sex discrimination complaint, which was referenced in the 2020 memorandum, and who appeared to be extensively and possibly inappropriately utilized as a personal assistant for Senator Wicker on foreign trips. They reported that afterwards, she appeared extremely distraught and developed an alcohol abuse problem at work that required a formal intervention and counseling by the Democratic Staff Director, as well as considering her termination. The Democratic Staff Director noted that Mr. Parker took a radically different approach to intervene with the female staffer to prevent her termination, which the Democratic Staff Director suggested may be linked to the employee’s work with Senator Wicker. Due to the sensitive nature of these matters, Dr. Schrage and Mr. Geffroy did not feel it was appropriate for them to extensively review these issues and sought to refer them to Commissioners or appropriate outside investigators.
30. This female staffer had also raised concerns about discrimination under Mr. Parker from Dr. Schrage’s initial staff meeting with her. Due to her and other female staff’s complaints, Dr. Schrage made it a priority to promote female staff involvement in key roles and initiatives, including on a historic trip to meet with Ukrainian President Zelenskyy; to give female staffers expanded roles; and to advocate for appropriate raises during the next review of overall staff salaries.
31. In or around Summer 2023, after Mr. Parker became aware he was under investigation, he and Mr. Lynch privately met with the female staffer who reportedly prepared a discrimination claim against Mr. Parker. While Mr. Parker previously declined to provide her with a major raise in salary for years, Mr. Parker and Mr. Lynch then promised to grant her an extraordinary, out of cycle raise, which she told Dr. Schrage would be as much as 140% of her current salary. After being offered this by Mr. Parker and Mr. Lynch, the staffer then refused to comment on her prior allegations against Mr. Parker when approached as part of the initial CAA investigation. Instead, she demanded that Dr. Schrage and Mr. Geffroy have Chairman Wilson immediately enact the raise she arranged with Mr. Parker and Mr. Lynch. As such a large increase out of cycle had never been done before, Chairman Wilson’s office indicated that all staff raises would need to be considered through the normal process due to concerns of interference with the CAA investigation. After this, the staffer refused to discuss her past allegations or recent communications with Mr. Parker and Mr. Lynch.
32. Additionally, Dr. Schrage and Mr. Geffroy learned of an earlier armed police incident and detention of Mr. Parker involving Capitol Police. At the entrance to CSCE’s government office building, police reported Mr. Parker “belligerently” refusing Capitol Police orders to surrender a military style locking knife for their inspection and fleeing from police ordering him to stop. In their report and interviews, Capital Police indicated that Mr. Parker then pulled the knife out of his pocket, causing the Capitol Police to draw weapons, handcuff, arrest, and detain him. While Senator Wicker publicly indicated it was mistake to arrest Mr. Parker, the police report and interviews state that Mr. Parker was appropriately arrested and noted that Chairman Wicker made two extraordinary interventions, traveling across the U.S. Capitol Police complex twice to engage them in a manner that made the police officials highly uncomfortable. After these interventions, Mr. Parker was not charged.
33. According to the former Democratic CSCE Chief of Staff, following this incident, the CSCE Chairman at that time called for Mr. Parker’s termination, but Senators Wicker and Cardin blocked this action, after which Mr. Parker relayed to staff that he was proud of his acts.
34. Dr. Schrage and Mr. Geffroy also obtained evidence that Mr. Parker provided benefits to foreign actors who provided benefits to him abroad and who Mr. Parker described as “special friends” of the CSCE. This included Bill Brower, a prominent foreign financier with extensive dealings in Russia, and Oleksiy Goncharenko, a prominent Ukrainian rival of President Zelenskyy who actively and publicly seeks to replace Mr. Zelenskyy as president.
35. After refusing to accept fellows from programs helping minorities obtain positions, Mr. Parker unilaterally, without consulting CSCE Fellowship Director, inserted Mr. Goncharenko’s top political operative in a CSCE fellowship that Mr. Parker created. This position then provided inside access to a partisan Ukrainian operative to U.S. government decision making on Ukraine, and according to CSCE’s lead on fellows, broke ethical rules banning foreign nationals from working on issues impacting their nations.
36. Additionally, Mr. Browder has for years exerted extensive influence and control over the CSCE through Mr. Parker and Massaro, including personally organizing hearings and witnesses, and originating shaping U.S. laws advanced through CSCE Congressional leaders and staff. In 2023, Mr. Browder offered what he was told were illegal and unethical gifts to Dr. Schrage and then became aggressive when Dr. Schrage declined to accept the gifts, saying Mr. Parker never objected when Mr. Browder provided him far more expensive gifts abroad. Following this, Mr. Browder began working around Dr. Schrage to continue to direct CSCE activities through Mr. Parker and Mr. Massaro.
37. The initial CAA investigation also revealed years of misconduct by Mr. Massaro, who CSCE leadership had previously removed from management, until his recent promotion. Multiple staff complained of sexual harassment by Mr. Massaro, including a female graduate school fellow whom staff reported crying to them, fearing that Mr. Massaro would destroy her career, and stating that Mr. Massaro should not be allowed to work with future female fellows. Other staff reported that Mr. Massaro inappropriately used fellows to work on his personal outside interests, including an outside initiative he developed with a former Democratic Congressman.
38. Like Mr. Parker, evidence showed that Mr. Massaro also provided special services and access to foreign officials who were personal friends or who provided him gifts or support on his unofficial trips to Ukraine. This includes Mr. Massaro generating an official CSCE invitation to a leader of a controversial Ukrainian military group, the Georgian Legion, linked to alleged human rights violations to speak at a CSCE event in the United States. Mr. Massaro indicated that he created this invitation because the Georgian Legion member had been or would likely be denied a U.S. visa and he wished to use the CSCE invitation to pressure the State Department to provide him a visa.
39. Repeated allegations of antisemitism by Mr. Massaro, including wearing the insignias of group linked to Neo-Nazis and promoting a figure who group was involved in the killing tens of tens of thousands of Jewish individuals in World War II, sparked public condemnation and news articles, some of which are summarized in the Daily Dot article entitled, *Congressional human rights commission slammed for appointing staff director with social media boosting Holocaust perpetrators: ‘So, one of your senior leaders is the guy glorifying Nazis.’* Other antisemitic incidents reported by staff concerning Mr. Massaro included when, during an official CSCE wreath laying at Dachau concentration camp where Jewish and other anti-Nazi figures were slaughtered, including through the use of ovens, Mr. Massaro made statements downplaying Hitler’s atrocities, reportedly stating “Hitler was not so bad compared to Russians.”
40. Further, Mr. Parker targeted CSCE’s most senior career staff, a woman with over 20 years at CSCE, after she blew the whistle and documented Mr. Parker’s and Mr. Massaro’s sexist, legal, and ethical violations. For example, Mr. Parker sought to usurp Chairman Wilson’s authority by undermining his appointment of this woman to a prominent role in Vienna. Mr. Parker asserted that Chairman Wilson’s decision to appoint her, instead of his preferred candidate, Shannon Simrell, was somehow unethical, illegal, or improper, and then attempted to use false statements about these acts as part of his assertions of inappropriate acts by those leading the CAA investigation.
41. Additionally, during their inquiry, Mr. Geffroy discovered that Mr. Parker received at least $30,000 in cash and managed exports for Ukrainian officials, and that Mr. Parker and Mr. Massaro launched a CSCE initiative to pressure U.S. export control agencies to change policies in ways could benefit those making the cash payments to Mr. Parker. Mr. Geffroy conferred with the Department of Justice Foreign Agent Registration Act (FARA) Unit Chief, who flagged these acts as seeming criminal FARA violations by Mr. Parker, which can be punished by up to two years in prison.
42. Later in July 2023, a source who reported working with the U.S. Department of Homeland Security to identify foreign threats reported to CSCE officials that Mr. Parker and Mr. Massaro were wittingly or unwittingly being manipulated by foreign assets tied to Ukrainian and Russian interests. This included Mr. Parker and Mr. Massaro engaging controversial former Russian Duma Member Ilya Ponomarev in their official CSCE capacities to discuss U.S. support for a "Wagner-style” coup in Russia. After the House Sergeant at Arms did an initial vetting of the source and credibility of their allegations, Chairman Wilson, Co-Chairman Cardin, and Ranking Members Wicker and Representative Steve Cohen unanimously agreed to refer these issues to the Federal Bureau of Investigation (FBI). During Mr. Geffroy’s last contact with the FBI, the FBI indicated the reported counterintelligence issues concerning Mr. Parker and Mr. Massaro were being taken “very seriously.”
43. Additionally, the Sergeant at Arms conducted a thorough review of CSCE’s security procedures after being notified of the counterintelligence issues involving Mr. Parker and Mr. Massaro. The Sergeant at Arms expressed concern regarding Mr. Parker’s written assertion that Chairman Wilson had no authority to be informed of Mr. Parker’s foreign contacts or activities, and found that under Mr. Parker and Everett Price, his hand-picked CSCE security manager, CSCE failed to meet key security requirements for years, including failing to make mandatory reports about their foreign contacts.
44. Mr. Parker and Mr. Price objected to the new security procedures established based on the Sergeant at Arms’ recommendations. Mr. Parker sent an email to the House Sergeant at Arms (it’s lead security office) rejecting the authority of the CSCE Commission Chairman or its Staff Director to be provided any knowledge or oversight of his foreign contacts and activities. These statements by Mr. Parker stating he recognized no authority of the entity (CSCE) legally responsible for holding his clearances were so concerning to Sergeant at Arms officials that they informed Mr. Geffroy that they may need to revoke all CSCE official clearances. Informed of this, Chairman Wilson had Mr. Geffroy draft letters that he sent to security agencies relaying Mr. Parker’s position and stating that as CSCE’s Chairman, Chairman Wilson could not be responsible for backing Mr. Parker’s clearances since Mr. Parker did not recognize his authority.
45. Mr. Parker also intervened to block Chairman Wilson’s pick of a military veteran then serving at the Pentagon to oversee national security matters, including potential foreign corruption and intelligence manipulation involving Mr. Parker and Mr. Massaro. Mr. Parker alleged that he had the authority to promote Michael Cecire into the position although Dr. Schrage and Mr. Geffroy learned that over several years, bipartisan staff complained that Mr. Cecire bullied a senior woman official, failed to show up for work for extended periods, skipped an international trip and falsely stated that he had notified his supervisor, refused to meet his supervisor to discuss performance issues, and engaged in insubordination.
46. Working in close coordination with Chairman Wilson’s office and Congressional employment offices, and after repeated attempts at counseling, CSCE placed Mr. Cecire under a performance improvement plan in good faith to encourage him to improve his work and inappropriate conduct. After several attempts were made in coordination with House employment lawyers and Chairman Wilson’s office to arrange a performance review meeting with Mr. Cecire, he refused to report to work for several months or respond to questions, although it was later learned he was working with Mr. Parker and Senate officials to generate allegations against Dr. Schrage and Mr. Geffroy.
47. From the end of July through September 2023, Chairman Wilson attempted to arrange a private meeting with Co-Chairman Cardin for Dr. Schrage and Mr. Geffroy to brief them on their investigation findings, but Mr. Lynch continually declined to schedule this meeting. Nevertheless, Dr. Schrage and Mr. Geffroy worked closely with Chairman Wilson, Mr. Day, and the OHEC attorneys to continue to review and revise their initial report materials. This included a cover letter for the report from Chairman Wilson that called for Mr. Parker’s immediate termination (making him the second Chairman to do so), actions to protect staff and prevent witness tampering, and urgent referrals of legal, criminal, and national security matters to appropriate federal agencies.
48. Also, during this time frame, unbeknownst to Dr. Schrage, while delaying the meeting between Chairman Wilson and co-Chairman Cardin, Mr. Lynch instructed Mr. Parker to compile a memorandum of alleged staff complaints against Dr. Schrage and Mr. Geffroy. These efforts, coordinated on Signal and other personal nonofficial communications, included Mr. Parker organizing allegations from several staff implicated in misconduct, including Mr. Massaro and Mr. Price, the woman who Mr. Parker promised an extraordinary raise, and Mr. Cecire.
49. After multiple attempts to arrange the Chairman and Co-Chairman briefing failed, Mr. Lynch, Senator Cardin, Senator Wicker, and Representative Cohen were provided a full copy of the initial CAA investigation report, the supporting evidence, and a cover letter from Chairman Wilson.
50. When Mr. Lynch finally scheduled a meeting with Chairman Wilson and Co-Chairman Cardin concerning the report, he excluded Dr. Schrage and Mr. Geffroy, while Senator Wicker intervened and joined while the meeting was in progress. After the meeting, the OHEC attorneys who attended informed Dr. Schrage and Mr. Geffroy that Senators Cardin and Wicker indicated that Mr. Parker raised allegations against Dr. Schrage and Mr. Geffroy but refused to provide Chairman Wilson with any specific information. The OHEC attorneys instructed Dr. Schrage and Mr. Geffroy that they [the OHEC attorneys] were now banned from talking with them on these matters, even though Dr. Schrage and Mr. Geffroy worked with the OHEC attorneys for months on the investigation and related matters. Also, despite their conflicted status, the OHEC attorneys stated that they would now be utilized in an investigation against Dr. Schrage and Mr. Geffroy.
51. Additionally, Senators Cardin and Wicker blocked the actions Chairman Wilson recommended be taken to protect staff and prevent witness tampering. For example, the Senators blocked Chairman Wilson’s call for Mr. Parker to either be fired or placed on paid leave and to refer the criminal, legal, and security matters to appropriate federal agencies, including obstructing Dr. Schrage and Mr. Geffroy from continuing to engage the FBI and Treasury officials on the potential criminal matters concerning Mr. Parker that were already flagged.
52. Chairman Wilson, in a series of statements, meetings, and formal letters, objected to using the undisclosed allegations against Dr. Schrage and Mr. Geffroy to target them for an extraordinary investigation. Chairman Wilson further stated that these and other actions appeared to be illegal “whistleblower retaliation” against them under the CAA. Chairman Wilson also rejected the idea that secret charges against Dr. Schrage and Mr. Geffroy could be hidden from Chairman Wilson, given his legal role as their supervisor.
53. After repeatedly requesting any substantive allegations against Dr. Schrage and Mr. Geffroy be disclosed, Mr. Day forwarded to Dr. Schrage a short bullet list of allegations dated November 8, 2023, but provided later, that Mr. Lynch sent. The sparse list detailed no specifics on incidents or individuals involved, appeared to cite not CAA violations, and included objections to normal management procedures including the establishment of legally required security measures. Mr. Day quickly dismissed this list to Dr. Schrage as “high school bullshit.”
54. Chairman Wilson indicated these allegations were not basis for any action whatsoever against Dr. Schrage and Mr. Geffroy and continued to demand that this whistleblower retaliation against them be stopped. Despite Chairman Wilson’s repeated written and oral objections, in November and December 2023, Mr. Day, in coordination with Senate officials, organized letters purporting to bear Chairman Wilson’s signature approving such an investigation. Key letters were issued while Chairman Wilson was several time zones away with Dr. Schrage in Armenia, where Chairman Wilson immediately indicated he had never approved such letters and called Mr. Day to object. Chairman Wilson reiterated his objection in writing in a November 19, 2023, letter that he personally reviewed, edited, and signed during that trip.
55. Despite Chairman Wilson’s direct instructions in writing and orally, Mr. Day and Senate officials coordinated another message purporting to bear the Chairman’s signature announcing the hiring of the law firm Seyfarth Shaw to investigate not only Mr. Parker, but also Dr. Schrage and Mr. Geffroy. At the time Seyfarth Shaw was selected, it was not disclosed to Dr. Schrage or Mr. Geffroy that Erica Watkins, the Senate attorney who advised Mr. Parker and Senators Wicker and Cardin, had been an associate there.
56. Upon seeing the message on hiring Seyfarth Shaw, Chairman Wilson reaffirmed that he had never authorized this action.
57. On December 13, 2023, Chairman Wilson personally reviewed and hand-signed a letter to Mr. Day objecting to and rescinding the hiring of Seyfarth Shaw. Later that day, Chairman Wilson met with the OHEC attorneys (Ms. Rogers, Mr. Gore, Ms. Salazar) and Mr. Day, all of whom were directly involved in launching the Seyfarth Shaw investigation, and who then pressured Chairman Wilson to rescind his letter saying it was too late to change course.
58. After this meeting, Chairman Wilson met with Dr. Schrage and Mr. Geffroy and relayed that OHEC counsel told him that he had no choice but to rescind his letter, as they had already moved forward with Seyfarth Shaw, and that he did so, which meant the investigation by Seyfarth Shaw would go forward. Chairman Wilson stated that he now believed Representative Cohen and Marilyn Dillihay, his personal office Chief of Staff, had been coordinating with and following the direction of Senator Cardin, and that under CSCE rules, Chairman Wilson could not protect Mr. Geffroy from whistleblower retaliation, including termination, if the other top three Commissioners voted in favor. In contrast, Chairman Wilson committed to protecting Dr. Schrage, stating that as Staff Director, only Chairman Wilson could terminate Dr. Schrage and requested that Dr. Schrage not resign despite the circumstances. Dr. Schrage, relying on this, and Chairman Wilson’s additional commitment to Dr. Schrage that he would be informed of any allegations against him and be given the opportunity to address them, agreed to stay.
59. Repeatedly, both before and after these events, Chairman Wilson made clear to Dr. Schrage and Mr. Geffroy that they should have fully funded counsel provided by CSCE or through the Congress. Chairman Wilson was informed of and supported their decision to obtain counsel through the House of Representative’s Office of Employee Advocacy (OOEA), which agreed to provide them with legal representation and to vigorously defend their rights.
60. On or about December 13, 2023, Mr. Day forwarded a letter from Chairman Wilson to Dr. Schrage and Mr. Geffroy stating that Mr. Day would need to review CSCE letters before they are signed by Chairman Wilson. The letter included a handwritten statement by Chairman Wilson expressing his support for Dr. Schrage and Mr. Geffroy. Mr. Day later sent an email to Dr. Schrage, whom up to that day Mr. Day had invited to stop by Chairman Wilson’s office at any time, alleging that Dr. Schrage was disruptive and that Mr. Day would control his access to Chairman Wilson’s office. In that email, Mr. Day also asserted that he was taking over a range of authorities that were legally Dr. Schrage’s as CSCE’s legal Staff Director, even though Mr. Day was a personal office employee in a separate legal entity with no legal CSCE role with or authority. Dr. Schrage replied, cordially requesting that he, Chairman Wilson, and Mr. Geffroy meet to discuss these matters, yet Mr. Day never responded. Dr. Schrage also discussed these matters with Chairman Wilson, who indicated that he never authorized Mr. Day to assume these authorities and that Dr. Schrage was welcome to his office at any time.
61. Mr. Day and staff under his supervision, including Stephanie Pendarvis, then became increasing hostile to Dr. Schrage, including attempting to physically block Dr. Schrage from entering Chairman Wilson’s office to attend meetings that Chairman Wilson specifically requested Dr. Schrage attend. Ms. Pendarvis alleged to the OHEC lawyers that Dr. Schrage was attending meetings uninvited, which Dr. Schrage proved to be false through texts and electronic meeting invitations from Chairman Wilson.
62. On December 22, 2023, Dr. Schrage filed a timely CAA claim under 2 U.S.C. § 1402 with the Office of Congressional Workplace Rights (“OWCR”) alleging retaliation for activity protected by the CAA.
63. In or about January to February 2024, Dr. Schrage was informed that the OHEC attorneys attempted to strip Dr. Schrage and Mr. Geffroy of their right to the Congressional-funded counsel then representing them, but that their legal argument was rejected. According to press reports from 2017 to 2018, these same senior OHEC attorneys, Ann Rogers and Russell Gore, were also involved in the retaliation against the African American CSCE official claiming sexual harassment. As noted above, this earlier case led to not only major media coverage, but to an OHEC lessons learned memorandum regarding its attorneys’ behavior, and amendments to the CAA advocated for by a former CSCE Commission Chair to reject OHEC attorneys’ assertions to deny CSCE claimants’ rights and to establish in stature that CSCE employees were entitled to full CAA rights as covered employees.
64. Despite this, on February 15, 2024, L. Wilhite, Director, OOEA, sent Dr. Schrage an email explaining that the Office of the Chief Administrative Officer (CAO) instructed OOEA to not provide representation to Dr. Schrage and "to cease providing services to any current Commission clients." Mr. Schrage was informed that following OHEC’s legal arguments and its first attempt to strip these rights being rejected, the implicated OHEC attorneys escalated this issue to make political arguments that this was needed due to the involvement of Senators and Senate officials. The political rationale that these rights were stripped because Senators are involved appears fundamentally inconsistent with the legal fact that CSCE is a bicameral entity, and that every CSCE action therefore involves Senators.
65. Upon being informed of this decision to strip Dr. Schrage and all CSCE complainants of their legal rights to Congressional Counsel, Chairman Wilson reiterated that Dr. Schrage and Mr. Geffroy should have legal fees covered by CSCE and the Congress. Both Chairman Wilson and the OHEC attorneys previously expressed to Dr. Schrage that his CSCE employees were legally entitled to representation by OOEA and did not indicate there was any question about this right until Dr. Schrage and Mr. Geffroy called for the OHEC attorneys (who previously advised them) to be removed from the investigation against them due to their conflicts.
66. On or about January 16, 2024, Seyfarth Shaw attorneys provided Dr. Schrage with a memorandum written by Mr. Parker dated September 11, 2023, to Senators Wicker and Cardin and Congressman Cohen (and their Chiefs of Staff) making allegations against Dr. Schrage and Mr. Geffroy that Mr. Parker had compiled from Mr. Cecire, Mr. Price, and Ms. Simrell, among others. Mr. Parker’s memorandum also revealed that he called for Senators to target Dr. Schrage and Mr. Geffroy specifically as individuals who could be up for Senate confirmation in the next Republican Administration and to threaten to destroy their future careers in government service to obstruct the investigation they were conducting. Despite that these allegations had been kept secret from Dr. Schrage and Mr. Geffroy, who were also not provided an opportunity to respond until now, the memorandum also suggested they “Fire Geffroy” to obstruct Mr. Geffory’s and Dr. Schrage’s investigation of Mr. Parker.
67. Mr. Parker also targeted Dr. Schrage for his cooperation with a U.S. Department of Justice investigation by Special Prosecutor John Durham of the Steele dossier and related Russian disinformation and attacked Dr. Schrage for providing information requested as part of a federal investigation.
68. Mr. Parker’s memo further indicated that he was aware of Dr. Schrage’s and Mr. Geffroy’s investigation into his conduct, referring to what he called their charges against him and “their manufactured scandal.”
69. On February 9, 2023, attorneys for Seyfarth Shaw interviewed Dr. Schrage for several hours with his counsel present. Dr. Schrage provided factual and later documentary evidence debunking Mr. Parker’s assertions and establishing that Mr. Parker knowingly made false statements. Dr. Schrage offered to return for a longer session to rebut other false charges Mr. Parker had made in his memo, but Seyfarth Shaw attorneys indicated he had addressed all the issues of concern and declined this offer.
70. During the questioning, it was apparent to Dr. Schrage that the Seyfarth Shaw attorneys did not deeply examine specific allegations against Mr. Parker, for example, accepting Mr. Parker’s bald assertions he had exceptions to receive gifts from foreign sources.
71. While the investigation was still ongoing, Mr. Parker leaked information to the press and foreign sources, including Mr. Browder, and made new false statements impacting Dr. Schrage, Mr. Geffroy, Chairman Wilson, and others to obstruct and undermine the investigation.
72. The New York Times ran a story entitled *Senate Aid Investigated Over Unofficial Actions in Ukraine* in which Mr. Parker falsely claimed the investigation against him was initiated in retaliation for his earlier complaints against Dr. Schrage and Mr. Geffroy, which was factually impossible based on the timing and his own statements in his September 11, 2023, memorandum, and attempted to explain his unauthorized travel, activities and receipt of tens of thousands of dollars related to Ukraine.
73. The New York Times quoted but concealed the identity of Jonathan Winer, Mr. Parker’s lawyer, who served as a main courier for Steele Dossier and was a former lawyer for the firm representing Mr. Browder. Additionally, Mr. Winer had previously concealed his prior service as FARA representative for a Putin-linked Russian oligarch Oleg Deripaska from Senate investigators. The New York Times’ article, therefore, did not reveal Mr. Winer’s interests in targeting Dr. Schrage for his cooperation with Special Prosecutor Durham, who examined Mr. Winer’s acts, as shown in the Special Prosecutor’s final report which noted that Mr. Winer stayed at Christopher Steele’s country home to prepare a document advancing his theory on Russian collusion with President Trump that was provided to senior State Department officials in July 2016, prior to the launch of a DOJ investigation into President Trump’s 2016 campaign. Mr. Winer was also aware that Dr. Schrage had been a public whistleblower in 2020, calling for all relevant information regarding this DOJ investigation to be disclosed prior to the 2020 election.
74. Following the New York Times story, Dr. Schrage’s Wikipedia page was vandalized with misinformation about him, referencing former State Department associates of Mr. Winer (including someone whom Dr. Schrage had not seen in over 20 years when the official had been removed and reassigned from State Department Bureau).
75. Additionally, Mr. Browder publicly attacked a New York Times reporter and threatened legal action for reporting facts concerning Mr. Parker and not promoting Steele-dossier style conspiracy theories regarding Dr. Schrage.
76. Mr. Parker, Mr. Browder, and others then again leaked information to Politico, which published a story entitled *A Washington Bulwark Against Putin is Being Rocked by Internal Strife. Is it Simple Dysfunction – or Something Worse?* which referred to Mr. Parker as a “hero” despite documents establishing years of bipartisan staff reported racism, sexism, and security violations; discussed the confidential internal investigation being conducted by Seyfarth Shaw; presented Mr. Parker’s defenses to the allegations against him; quoted from individuals implicated in Mr. Parker’s allegations without disclosing their conflicts’ and advanced a false conspiracy theory that Dr. Schrage (who had among other leadership in opposing Putin’s Ukraine War aggression, recently organized the first ever U.S. hearing in Nuremberg’s Court Room 600 on Putin’s war crimes with remarks from President Zelenskyy) was somehow pro-Putin. In contrast, the only opportunity Dr. Schrage was given to respond to the article was immediately before it was published, when Dr. Schrage was in a hospital emergency room.
77. After these stories were published, Chairman Wilson told Dr. Schrage that all the senior CSCE Commissioners involved knew that Mr. Parker’s statements in the New York Times and Politico articles were false and factually impossible based on the timeline of events as the investigation into Mr. Parker launched in the Spring 2023, and Mr. Parker did not write his memorandum, which referenced the investigation and charges against him, until months later in September 2023. Despite this, CSCE leaders repeatedly rejected Dr. Schrage’s requests to correct these known false, defamatory statements.
78. On March 22, 2024, Chairman Wilson wrote to Dr. Schrage that Seyfarth Shaw’s report fully “vindicated” Dr. Schrage. This was followed up by repeated conversations between Dr. Schrage and Chairman Wilson wherein Chairman Wilson reiterated that Seyfarth Shaw had not found that Dr. Schrage did anything illegal or improper and included notable positive statements about Dr. Schrage from staff. Dr. Schrage requested to see the report, which Chairman Wilson again reiterated Dr. Schrage should be allowed to review, but Dr. Schrage was never permitted to do so.
79. Chairman Wilson also indicated that Co-Chairman Cardin would be stepping down following the findings in the report and instructed Dr. Schrage to arrange a meeting with the Chief of Staff for Senator Sheldon Whitehouse, whom Chairman Wilson said would be taking over the CSCE role of Co-Chair. Chairman Wilson also instructedDr. Schrage to arrange a meeting with the Chairman andMr. Day, whom Chairman Wilson would direct to stop obstructing Dr. Schrage’s efforts and move forward. Despite this, both Senator Whitehouse’s staff and Mr. Day refused to meet with Dr. Schrage, despite his repeated attempt to do so.
80. On April 18, 2024, Dr. Schrage arrived at CSCE for what he was told was the meeting with Chairman Wilson and Mr. Day, that Mr. Day had previously delayed. Instead, Ms. Dillihay, Chief of Staff for Congressman Steve Cohen, was present, despite her having no legal role with the Commission as a personal office staffer in the separate legal entity of the Office of Representative Cohen, and even her supervisor, Representative Cohen, himself having no legal authority in over Dr. Schrage’s position under the CSCE statute. Chairman Wilson’s only words at the meeting were to say to Dr. Schrage “I will always support you,” before Ms. Dilihay assumed control of the meeting. Despite this lack of any legal role, Ms. Dillihay then stated to Dr. Schrage that “they,” without specifying whom, reached a decision to end Dr. Schrage’s employment at CSCE. Dr. Schrage then requested to have his attorney present given that Ms. Dillihay had no CSCE role or authority over Dr. Schrage, but Ms. Dillihay refused. Mr. Schrage then calmly departed the office.
81. Despite statements in this meeting that the discussion of these matters should be confidential, Dr. Schrage’s departure from the CSCE was immediately leaked to Politico, which published in its daily Playbook widely distributed to U.S. officials.
82. Dr. Schrage was later told, that following his being “vindicated” by the Seyfarth Shaw report, Chairman Wilson was aggressively pressured, in meeting arranged by Mr. Day and staff implicated in the report Dr. Schrage and Mr. Geffroy prepared, to remove Dr. Schrage, which would cover up these acts.
83. To this date, no CSCE official provided Dr. Schrage any basis for his termination besides an email from Ms. Dillihay broadly citing claims of a “negative management” style.
84. Mr. Parker and Mr. Massaro remain at the Commission, where Mr. Massaro was promoted into Dr. Schrage’s CSCE’s Staff Director position, where Mr. Massaro is conflicted regarding further investigating or reporting to federal law enforcement the allegations also implicating him and Mr. Parker.
85. Plaintiff has sustained economic damages and mental anguish as the result of Defendant’s illegal actions and will continue to sustain damages into the future.

**COUNT I**

**Retaliation**

**Congressional Accountability Act**

**2 U.S.C. § 1317**

1. Dr. Schrage hereby incorporates the allegations set forth in the foregoing paragraphs as though fully alleged herein.
2. Dr. Schrage, at the time of his termination, was an employee of the Commission pursuant to 22 U.S.C. § 3008(b)(1).
3. Dr. Schrage, at the time of his termination, is a “covered employee” under the CAA as defined by 2 U.S.C. § 1301(a)(3) pursuant to 2 U.S.C. § 1301(b)(1)(A), as an employee of the Commission.
4. Pursuant to 2 U.S.C. § 1301(b)(2), the Commission is an “employing office” under the CAA.
5. Dr. Schrage engaged in activity protected by the CAA when he initiated and completed an initial investigation into the alleged discrimination by CSCE staff, opposed discrimination and retaliation by CSCE staff, and when he filed a complaint on December 22, 2022, alleging retaliation in violation of the CAA.
6. The Commission illegally subjected Dr. Schrage to retaliation for his protected activity when it terminated him within a short time after he engaged in activity protected by the CAA.
7. Dr. Schrage has sustained damages as the result of the Commission’s illegal retaliation in violation of the CAA, including, but not limited to, damage to his career, and emotional, mental, and physical distress.
8. Dr. Schrage is entitled to such legal or equitable relief as will effectuate the purposes of the statute, including but not limited to economic and compensatory damages, and reasonable costs and attorneys’ fees.

#### RELIEF REQUEST

Based on the foregoing, Dr. Schrage respectfully requests that he be awarded the following relief against the Commission:

1. Reinstatement or, in lieu thereof, full lost pay and benefits, including future employment damaged by CSCE’s actions;
2. Economic damages for lost compensation and benefits and damages to Dr. Schrage’s career, reputation, and earning capacity in an amount to be determined;
3. Compensatory damages, including but not limited to pain and suffering, emotional distress and reputational damage;
4. Injunctive and declaratory relief required to make Dr. Schrage whole and restore his reputation;
5. Reasonable costs and experts’ and attorneys’ fees;
6. Any other such relief that a court may deem just and equitable.

**JURY DEMAND**

Plaintiff demands a jury for all issues proper to be so tried.

Respectfully submitted,

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Debra D’Agostino

D.C. Bar No. 481942

Federal Practice Group, LLP

801 17th Street, N.W., Suite 250

Washington, D.C. 20006

Tel: (202) 862-4360/Fax: (888) 899-6053

ddagostino@fedpractice.com

Counsel for Plaintiff

1. *See* https://www.washingtonpost.com/politics/how-a-congressional-harassment-claim-led-to-a-secret-220000-payment/2018/01/14/b3e5c6ae-dec4-11e7-bbd0-9dfb2e37492a\_story.html. [↑](#footnote-ref-1)