

**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
CONNECTICUT DISTRICT OFFICE**

[REDACTED]
Claimant,
v.
PARTNER REINSURANCE COMPANY OF THE U.S.,
Respondent.

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Claimant [REDACTED], hereby alleges the following against Respondent, Partner Reinsurance Company of the U.S (“PartnerRe” or the “Company”), in support of his claims of unlawful discrimination and retaliation on the basis of his race and gender.

MATERIAL FACTS

I. [REDACTED] Immigrated from [REDACTED] and Quickly Excels at PartnerRe

1. In 2001, [REDACTED] immigrated from [REDACTED] to the United States.
2. With English as his second language, he built his career from the ground up, first earning an associate’s degree in accounting from the [REDACTED] and then, [REDACTED] [REDACTED] earned a [REDACTED] from [REDACTED].
3. After graduating, he joined [REDACTED] as a [REDACTED] while simultaneously completing his [REDACTED] at [REDACTED] [REDACTED]

4. He next served as a [REDACTED] at [REDACTED] and, in 2016, became a [REDACTED] [REDACTED] at [REDACTED], before becoming a [REDACTED] at [REDACTED] in 2018.

5. While at [REDACTED], [REDACTED] simultaneously completed the [REDACTED] [REDACTED], sharpening his leadership, management, accounting, finance, marketing, and operations skills.

6. [REDACTED] sustained commitment to finance and leadership is what set the stage for his recruitment to PartnerRe in 2022.

7. In 2022, [REDACTED] joined PartnerRe as a [REDACTED], supporting the United States and Canadian statutory and tax reporting.

8. Following senior departures in late 2022, [REDACTED] scope expanded materially. He became the operational anchor of the United States controller function, closing the books, preparing National Association of Insurance Commissioners (“NAIC”) and Canadian filings, supporting audits, and coaching staff.

9. He often worked nights and weekends to meet immovable deadlines. By April 2024, he was promoted to [REDACTED].

10. Throughout [REDACTED] tenure, he reported to Chief Financial Officer Anthony Albano.

II. [REDACTED] Witnesses Discrimination Against Another Hispanic Employee at PartnerRe

11. When [REDACTED] first joined PartnerRe, he reported to Christopher Fonseca, and worked alongside Jose Raposo, who is also Hispanic.

12. On the floor and in day-to-day interactions, ██████ watched as Mr. Albano, who is white, singled out Mr. Raposo with criticism that was harsher and more frequent than anything directed at his other white colleagues.

13. ██████ is not the only one who noticed Mr. Albano's treatment of Mr. Raposo; his colleagues noticed it too, including Agnes Morawski, Human Resources ("HR") Coordinator and Payroll.

14. In fact, Ms. Morawski would often come by Mr. Raposo's desk, which was next to ██████, to check in on him.

15. What began as "tough feedback" quickly turned into discriminatory treatment that wore Mr. Raposo down, and by early 2024, Mr. Raposo resigned due to Mr. Albano's discriminatory treatment.

16. After resigning from PartnerRe, Mr. Raposo sent a formal complaint to HR Business Partner, Dennis White, and Group CFO, Albina Kealy, copying ██████. Mr. Raposo's complaint described the discriminatory treatment he had experienced at PartnerRe, and specifically at the hands of Mr. Albano.

17. Notably, in or around March 2024, HR asked ██████ whether he still had this complaint. HR told ██████ it was confidential and could not be discussed with anyone. Soon after, ██████ no longer had access to the complaint, and upon information and belief, HR removed it from his computer.

18. Despite putting the Company on clear notice of Mr. Albano's discriminatory behavior, the Company chose inaction, allowing Mr. Albano's harassment and discriminatory behavior to continue unabated.

III. Mr. Albano Discourages ██████ From Taking Parental Leave

19. At the end of 2023, ██████ first informed Ms. Murawski that he and ██████ were starting the adoption process.

20. Ms. Murawski, knowing the Company's parental leave policy and the abundance of paid time off ("PTO") ██████ had accrued, encouraged him to take advantage of the Company's policy.

21. ██████ expressed to Ms. Murawski that he had concerns about taking parental leave due to staff shortages and, in particular, Mr. Albano's tendency to focus on deadlines and discourage ██████ from taking time off.

22. In early 2024, ██████ raised his concerns about taking parental leave with Mr. White.

23. However, Mr. White took no action following their conversation. ██████ went out of his way to plan his parental leave around deadlines, a courtesy other employees did not always afford the Company, yet PartnerRe made no effort to assist ██████

24. Instead, the Company left ██████ to navigate the process alone, reinforcing his reasonable belief that if he exercised his right to parental leave, he would be penalized.

25. At Ms. Murawski's suggestion, ██████ sent an email to Mr. Albano on or around September 2024 regarding his remaining PTO and upcoming parental leave.

26. However, Mr. Albano never responded, after which Ms. Murawski suggested that ██████ reach out to Mr. White regarding his parental leave.

27. On or around April 5, 2024, ██████ adopted a child. Under PartnerRe's parental leave policy, he was entitled to paternity leave. However, when ██████ asked Mr. Albano about taking the paternity leave to which he was entitled, Mr. Albano

discouraged him from doing so, making comments such as, “You can’t take leave around company deadlines,” and “Why does the man need that much time off? It’s the woman who has the baby.”

28. Further, Mr. Albano told ██████ that since he knew his job was at a “higher level,” ██████ should “do the right thing.”

29. These comments were not only offensive and discriminatory, given that ██████ is a ██████ raising his child with ██████, but they also reflected a deeply rooted, heteronormative assumption that only women, and not men like ██████, are entitled to take parental leave.

30. By repeatedly invoking ██████ “higher level” role and urging him to “do the right thing,” Mr. Albano made clear that he expected ██████ to forgo his rights to parental leave in order to prove his loyalty to the Company.

31. ██████ reasonably understood these statements as an implicit threat that if he requested or took the parental leave to which he was entitled, he would face retaliation.

32. In or around December 2024, ██████ met with the head of Human Resources, Pamela Thomson, to ask for an extension of his parental leave window because, under Company policy, he had not been able to take leave within six months of his child’s adoption.

33. Ms. Thomson identified no policy that would bar ██████ from taking such leave at this stage.

34. However, after ██████ conversation with Ms. Thomson, Mr. White was visibly upset that ██████ had reached out to her.

35. In fact, Mr. White demanded that ██████ never contact Ms. Thomson directly in the future.

36. Despite Mr. Albano, Ms. Thomson, and Mr. White all being well aware of [REDACTED] for parental leave, no plan was created to allow [REDACTED] the time off.

37. Further, Mr. White's reaction sent a clear message that [REDACTED] would be punished, not supported, if he attempted to seek assistance outside of his immediate chain of command.

38. His directive that [REDACTED] refrain from contacting Ms. Thomson again effectively cut [REDACTED] off from the very resource that could have helped him secure his parental leave, and reinforced [REDACTED] reasonable belief that asserting his right to parental leave would lead to retaliation.

IV. [REDACTED] Endures a Campaign of Racist and Homophobic Disparate Treatment That Continues Unabated Despite Repeated Reports to Mr. Albano and HR

39. In or around December 2023, Mr. Albano brought in Evan Levesque, a white man from the Financial Planning and Analysis team, to assume Terence Greene's role.

40. Mr. Levesque had no relevant experience for the position, yet was given a raise upon his transfer.

41. When [REDACTED] became Controller in April 2024, Mr. Albano remained his manager, and Mr. Levesque began reporting to [REDACTED]

42. Mr. Levesque consistently struggled with his performance.

43. He was dismissive of colleagues and would frequently interrupt others during team meetings. He also repeatedly missed important deadlines, which disrupted workflows and negatively impacted the rest of the team.

44. Even when Mr. Levesque met a deadline, his work was often inaccurate or incomplete, forcing his colleagues, often [REDACTED], to work longer hours to correct his mistakes.

45. On a weekly basis, ██████ raised these issues with Mr. Albano and asked him to elevate them to HR.

46. Nevertheless, Mr. Albano refused and consistently made excuses on Mr. Levesque's behalf—a courtesy he did not extend to other employees. Notably, this stood in stark contrast to how Mr. Albano had treated Mr. Raposo. Given Mr. Albano's lack of concern about Mr. Levesque's poor performance, ██████ reached out to Ms. Thomson via Microsoft Teams for guidance.

47. Ms. Thomson indicated that Mr. White would follow up with ██████ to provide additional support.

48. Mr. White did follow up, and ██████ Mr. White, and Mr. Albano held several meetings to discuss Mr. Levesque's performance concerns.

49. However, it quickly became clear to ██████ that Mr. Albano's opinion was the only one that mattered.

50. Thus, from 2024 to 2025, despite clear and documented proof of Mr. Levesque's underperformance—including multiple coaching sessions, written improvement plans, and constant follow-ups developed and implemented by ██████ HR, and Mr. Albano refused to place Mr. Levesque on a Performance Improvement Plan.

51. This decision appeared heavily influenced by Mr. Albano's repeated excuses for Mr. Levesque and further disregarded ██████ expertise and supervisory authority over him.

52. Notably, in or around the end of 2024, after Mr. Levesque's wife gave birth, he received parental leave with prompt approvals from Mr. Albano and HR and, unlike ██████ was not subjected to derogatory comments or forced to navigate unnecessary hurdles.

53. Mr. Levesque's experience stood in stark contrast to [REDACTED]. At this point, it became clear to [REDACTED] that PartnerRe systematically favored white, heterosexual employees and discriminated against him because he is a Hispanic, gay man.

54. On or around January 14, 2025, Ms. Kealy traveled from the Company's Ireland offices to meet managers in the Stamford office. [REDACTED] met with her for approximately two hours and discussed his concerns with Mr. Levesque's performance in detail.

55. However, no action followed.

V. **PartnerRe Enables Dennis Saslofsky's Harassment of [REDACTED] Based on His Sexual Orientation and Race**

56. [REDACTED] sat across from Dennis Saslofsky, a former tax manager re-hired in 2024.

57. In or around April 2025, immediately after a call they both joined, within earshot of [REDACTED], Mr. Saslofsky told another employee that [REDACTED] "can't even speak English."

58. [REDACTED] memorialized this xenophobic remark in his notes because it caused him such distress.

59. At that time, however, [REDACTED] did not feel comfortable reporting Mr. Saslofsky's remark, given how his prior complaints had been ignored.

60. However, Mr. Saslofsky's discriminatory comment was not an isolated event.

61. By way of example, after [REDACTED] informed Mr. Saslofsky that he and his husband were looking to adopt a child, Mr. Saslofsky said, "I could never adopt a child. I prefer to adopt a dog."

62. Following this conversation, Mr. Saslofsky began to undermine [REDACTED] role and authority.

63. Mr. Saslofsky began using a condescending tone with [REDACTED] and constantly emphasized to [REDACTED] that he knew how to do [REDACTED] job because he "used to do it."

64. In another instance during a meeting with Jennifer Vargesco, Group Director of Taxes, Mr. Albano, and Mr. Saslofsky, as [REDACTED] was explaining a tax matter, Mr. Saslofsky interrupted [REDACTED] and said, “let me translate for Jennifer [Vargesco] so she understands.”

65. Despite being made in front of two senior leaders, nothing was done to reprimand Mr. Saslofsky or protect [REDACTED]

66. [REDACTED] raised concerns about Mr. Saslofsky’s behavior to Mr. Albano, specifically noting that Mr. Saslofsky’s lack of collaboration and obstructive behavior made it harder for [REDACTED] to do his job.

67. Nevertheless, Mr. Albano took no meaningful action to protect [REDACTED]

68. Notably, Mr. Saslofsky’s behavior was not unknown to ParterRe.

69. Indeed, Christina Rizzo, Deputy Head of Reinsurance Closing, Michelle Barresi, Senior Insurance Closing Analyst, and Susani Li, AVP, Reinsurance Closing, frequently commented on Mr. Saslofsky’s demeaning conduct towards [REDACTED]

70. In fact, Mr. Saslofsky’s behavior was so disruptive that Ms. Barresi requested to move desks to get further away from him.

71. [REDACTED] had a meeting with Ms. Vargesco, Mr. Saslofsky, and Mr. Albano to discuss Mr. Saslofsky’s behavior and to clarify [REDACTED] and Mr. Saslofsky’s roles.

72. During the meeting, Ms. Vargesco suggested that Mr. Saslofsky and [REDACTED] should attend “couples counseling” to work out their issues.

73. This comment was not only unhelpful, but clearly inappropriate and demeaning, trivializing [REDACTED] legitimate concerns and mocking the situation by likening a serious workplace conflict to a romantic relationship.

74. Given that [REDACTED], Ms. Vargesko's remark also played into offensive stereotypes about his sexual orientation and signaled that the Company would make light of, rather than address, the discriminatory treatment he was experiencing.

75. After PartnerRe failed to take any action to correct Mr. Saslofsky's misconduct, in or about January 2025, the harassment intensified.

76. While [REDACTED] was in a restroom stall at work, Mr. Saslofsky entered on a call and stated, **"I cannot work with this fa**ot; I hope Trump gets rid of them."**

77. Given Mr. Saslofsky's prior remarks and the ongoing pattern of targeting [REDACTED], it was clear that Mr. Saslofsky was using this slur to refer to him.

78. [REDACTED] was understandably terrified by Mr. Saslofsky's comment and remained in the restroom for more than an hour to regain his composure.

79. A few weeks later, after a scheduled team meeting, [REDACTED] reported Mr. Saslofsky's derogatory comment to Mr. Albano.

80. Rather than treating the complaint as a serious incident of harassment, Mr. Albano offered only a cursory apology and remarked that [REDACTED] "relationship with Dennis [Saslofsky] would now be impacted."

81. Despite having knowledge of Mr. Saslofsky's harassment and discrimination, Mr. Albano took no action to investigate [REDACTED] claims or protect [REDACTED] from further harassment.

82. In failing to respond, Mr. Albano made it clear that such conduct at PartnerRe would be tolerated and [REDACTED] was not safe to be himself.

83. After Mr. Albano failed to respond to Mr. Saslofsky's heinous language, [REDACTED] informed Ms. Barresi about it.

84. [REDACTED] also informed several coworkers and members of PartnerRe’s Pride Committee, including Ms. Li, Richard Fiori, Senior Tax Accountant, Alex Rodriguez, Senior Investment Accountant, Irma Lara, Financial Analyst, Carolina Chang, VP—Corporate Compliance, Carolina Otero, HR and Payroll Manager, Joyce Allen David, AVP Contract Specialist and member of ParterRe’s Pride Committee, Hassan Oztutar, Data and Anaylst Specialist and member of ParterRe’s Pride Committee, Lucy K. Buggy, Corporate Secretary— Legal Corporate Secretary in Legal and Compliance and Compliance, Andrew Gray, Head of Finance & Group Technial Reporting, Monica Fandino, Executive Assistant, Michelle Popat, Head of U.S. GAAP Reporting, and Charlene Seon, Reinsurance Analyst, and while he received personal support, the Company still took no corrective action.

85. On top of the verbal report, [REDACTED] also sent Mr. Albano an email detailing Mr. Saslofsky’s conduct but again, Mr. Albano never escalated [REDACTED] complaint.

86. Mr. Albano’s failure to properly respond to [REDACTED] concerns, particularly in light of a written complaint, reflects the Company’s indifference to harassment.

87. In or about April or May 2025, the Company circulated a “diversity and inclusion” survey that was not anonymous.

88. Despite the obvious chilling effect of a non-anonymous survey, [REDACTED] nonetheless reported Mr. Saslofsky’s conduct, including the restroom slur, and the escalating hostility he was facing at the Company.

89. Shortly after completing the survey, [REDACTED] learned from Monica Fandino, Executive Assistant, and Mr. Oztutar that senior leadership was made aware of the survey results.

90. Specifically, [REDACTED] learned from Mr. Oztutar that Lisa Bolger, Global Head of HR, learned about the discrimination and harassment [REDACTED] was experiencing at the Company.

91. Nevertheless, no one from management or HR contacted him in response.

92. Following the Company's continued inaction, in or around April 2025, ██████ called the Employee Assistance Program ("EAP") seeking support.

93. Shockingly, the representative told him that unless he was suicidal, they could not assist him.

94. ██████ explained in detail the harassment he was experiencing and the severe emotional toll it was taking on him, yet he was again told that the EAP could offer no help.

95. With nowhere else to turn, in or around May 2025, ██████ escalated his complaint to Ms. Otero, specifically describing both the EAP's refusal to provide assistance and the ongoing hostility he was enduring from Mr. Saslofsky and Mr. Albano.

VI. Homophobic Targeting of ██████ Pride Flag is Met with Complete Indifference by PartnerRe

96. In or around June 2025, ██████ Pride flag, which he proudly displayed on his desk in the open-floor-plan finance area, began to mysteriously disappear and reappear, then disappear again.

97. It quickly became apparent that this was not an isolated incident, but a targeted pattern of harassment directed at ██████ because of his sexual orientation.

98. Coworkers, including Ms. Li and Ms. Rizzo, began making comments such as, "Where's your flag?" and "Are you not proud?" These remarks humiliated ██████ and underscored that others in the office were not only aware of what was happening but were treating it as a source of ridicule rather than concern.

99. Every week, Ms. Kealy conducted team meetings attended by ██████, Mr. Levesque, Mr. Fiori, and Mr. Albano. During these meetings, ██████ repeatedly reported to Mr. Albano that his Pride flag was missing.

100. On several occasions, Mr. Albano refused even to acknowledge the complaint; instead, he just stayed silent.

101. ████████ colleagues were aware of the ongoing interference with ████████ Pride flag, and on several occasions, Ms. Seon, in particular, stayed late or came in on Fridays, times when other employees were not in the office, to try and find out who was stealing ████████ flag.

102. Despite ████████ persistent reports, Mr. Albano refused to document the issue in writing or escalate it to HR, and PartnerRe took no corrective action whatsoever.

103. This deliberate indifference sent ████████ a clear message: homophobic harassment would be tolerated, and his concerns as a gay Hispanic man would not be taken seriously.

104. After ████████ put Mr. Albano on actual notice of the repeated removal of his Pride flag, the Company still took no corrective action.

105. PartnerRe issued no directive instructing employees to refrain from tampering with coworkers' workstations; it implemented no seating changes or other measures to separate ████████ from suspected actors.

106. Nor did the Company interview witnesses, collect written statements, or review floor-access data.

107. As a direct result, the removals of ████████ Pride flag continued throughout the summer of 2025, coworkers persisted in making comments about his identity, and ████████ was left entirely unprotected.

108. This failure to take prompt, effective measures to stop the harassment not only intensified the targeting of [REDACTED] and facilitated its continuation but also created and reinforced a hostile work environment for him.

109. As Mr. Albano continued to ignore his reports, [REDACTED] escalated his concerns to Ms. Otero and informed her that his Pride flag kept disappearing from his workstation and that the situation was taking a serious emotional toll on him.

110. He also explained that Ms. Li had suggested he contact the employee-assistance line, but given [REDACTED] prior experience, he knew the Help Line would not be able to assist him. Ms. Otero acknowledged what was happening and even remarked, “I don’t understand why they rehired Dennis Saslofsky back,” making clear that she understood the source of much of the hostility.

111. Yet, despite this awareness, Ms. Otero did not take any remedial action to protect [REDACTED]

112. [REDACTED] continued to inform Mr. Albano, during their weekly team meetings, that, although he had tried to ignore what was happening with his personal belongings, it was beginning to affect him emotionally.

113. He told Mr. Albano that he felt “abused” and that, while the behavior might appear childish on its face, it was unacceptable and should not be tolerated in the workplace.

114. As a direct result of the Company’s continued inaction and the emotional distress he experienced, [REDACTED] began to suffer from significant anxiety, loss of sleep, and a noticeable stutter.

115. These symptoms caused him substantial emotional strain and made it increasingly difficult for him to feel stable and secure at work.

116. By July 2025, the conduct escalated beyond stealing ██████ Pride flag.

117. Around this time, a small elephant figurine from ██████ desk was found in a trash bin near his work area.

118. ██████ retrieved it and promptly reported the incident to Mr. Albano. Again, no intervention followed.

119. Weeks later, the same figurine was discovered hidden inside one of ██████ desk drawers. This item was found by Mr. Albano, who had accessed ██████ desk drawer while ██████ was not in the office.

120. ██████ again notified Mr. Albano. Predictably, Mr. Albano did nothing. Around this time, coworkers, including Mr. Rodriguez, Ms. Li, Mr. Levesque, Ms. Barresi, and Ms. Seon, began informally documenting what they observed, including taking photographs.

121. Out of growing frustration, ██████ and his colleagues even discussed ways to identify who was responsible, including setting up a camera or subtly marking personal items to track whether they were being moved.

122. The situation became so distressing that, after working 12 to 14-hour days, ██████ would drive to the Stamford office specifically to check on his belongings.

123. He discreetly marked items with a small “X” or arranged them in particular ways that only he would recognize, so that he could confirm whether they had been tampered with.

124. As the work environment further deteriorated and his sense of vulnerability grew, ██████ ultimately made the decision to remove his personal belongings from his desk.

125. On multiple occasions, he went into the office after regular business hours and on weekends to collect his items so that none of his personal effects would remain in the workplace, because he no longer felt safe or comfortable leaving them there.

126. This experience was deeply humiliating and distressing. [REDACTED] felt forced into these actions by the Company's failure to provide any appropriate response or support to the harassment he was enduring.

127. In early July 2025, [REDACTED] suffered back-to-back family tragedies. His uncle died on July 7, 2025, and within eight hours of his uncle's burial on July 9, 2025, [REDACTED] [REDACTED] [REDACTED]

128. Both deaths occurred in [REDACTED] home country. [REDACTED] immediately informed Mr. Albano, yet Mr. Albano took no steps to help [REDACTED] manage his workload or take meaningful bereavement leave.

129. Instead, amid direct pressure from Mr. Albano, [REDACTED] was effectively forced to take only a single day off.

130. Unlike the assistance Mr. Albano routinely extended to [REDACTED] colleagues, helping them find coverage and moving deadlines, no comparable support was offered to [REDACTED] [REDACTED]

131. In or around July 24, 2025, Mr. Levesque left the Company.

132. On July 24, 2025, Mr. Levesque provided written feedback to the Company that [REDACTED] had been subjected to ongoing discriminatory treatment and PartnerRe had failed to intervene.

133. The next day, July 25, 2025, Mr. White called [REDACTED] to ask him about Mr. Levesque's email and to let him know that HR would be "starting an investigation," explaining that Mr. Levesque had reported that [REDACTED] was experiencing discrimination.

134. Mr. White then informed [REDACTED] that he would be on vacation for the next two weeks and that Ms. Thomson would contact [REDACTED] the following week.

135. Notably, no interim measures were implemented to ensure that [REDACTED] would be protected before the investigation commenced.

136. In other words, HR's belated outreach, triggered not by [REDACTED] **multiple** protected complaints but by a departing white, heterosexual employee's disclosure, resulted in no concrete action.

137. That same day, [REDACTED] informed Mr. Albano that HR intended to conduct an investigation. Mr. Albano set a meeting with Ms. Thomson and [REDACTED] for the following Monday, July 28, 2025, and then canceled it without explanation.

138. [REDACTED] later learned that Mr. Albano met with Ms. Thomson alone that day. On Tuesday, July 29, 2025, Ms. Thomson scheduled a meeting with [REDACTED].

139. In that meeting, Ms. Thomson asked [REDACTED] to recount the specific dates of each incident. When [REDACTED] could not immediately recall these dates, she remarked, "I wish you had come to me earlier."

140. [REDACTED] explained that he had repeatedly tried to report the harassment and discrimination he was facing to Mr. Albano, the EAP, and HR, but received no support. Further, he told Ms. Thomson that the harassment was ongoing.

141. On July 30, 2025, Ms. Thompson contacted [REDACTED] via Microsoft Teams to ask if he had a moment to chat regarding the EAP.

142. [REDACTED] was surprised that this was the first, and only, issue she chose to address, rather than the discriminatory remarks and other serious concerns he had previously reported.

143. Her focus was narrowly on [REDACTED] remark that when he called the EAP, the representative told him they could not assist with HR-related issues and could only provide intervention if he were in a suicidal state.

144. During the conversation, Ms. Thomson asked whether [REDACTED] would be willing to sign a TELUS Health authorization form so that the Company could access “relevant records,” repeatedly assuring him that no clinical content would be reviewed or released.

145. Later that day, Ms. Thomson sent him an email with the TELUS Health authorization.

146. However, contrary to Ms. Thomson’s assurances, the attached document was a broad release that would have authorized the Company to obtain [REDACTED] medical records and the full content of his discussions with the counselor.

147. After reviewing the form, [REDACTED] spoke with Mr. Gray and later shared his concerns with several colleagues, all of whom advised him not to sign because the authorization was inconsistent with what Ms. Thomson had represented.

148. [REDACTED] then called the EAP directly and confirmed that the release would, in fact, entitle the employer to all information from his call, including clinical content.

149. On that basis, he chose not to sign the document. Afterward, neither Ms. Thomson nor anyone else in HR ever followed up with [REDACTED] regarding the discriminatory conduct and hostile work environment he had reported at PartnerRe, further confirming that the Company had no intention of addressing or remedying his concerns.

150. On the night of Wednesday, August 13, 2025, after completing NAIC and Canadian filings, [REDACTED] told Mr. Albano he would be taking two additional days of previously scheduled vacation. Mr. Albano told him to enter the time before logging off for the day.

151. Late that night, while submitting the request, [REDACTED] inadvertently selected an FMLA option rather than standard PTO.

152. On August 14, 2025, Mr. Albano denied the mistaken entry and approved the corrected PTO. However, despite the correction and approval, HR sent ██████ an FMLA packet without explanation.

153. Although on approved PTO, ██████ continued working until approximately 11:00 a.m. to complete hand-offs and deliverables.

154. While ██████ was on PTO, Mr. Albano conducted interviews to replace Mr. Levesque without including ██████, despite the fact that ██████ would be Mr. Levesque's replacement's supervisor.

155. This directly contradicted the consistent practice at PartnerRe for supervisors to participate in their subordinates' interviews. Notably, that protocol was not followed for ██████

VII. ██████ is Unjustly Terminated Following a Sham HR Investigation

156. On Tuesday, September 2, 2025, ██████ attended a meeting with Ms. Thomson, Ms. Kealy, and Joy Langford, General Counsel.

157. Notably, Ms. Langford's attendance was not disclosed to ██████ before the meeting. Reading from prepared remarks, Ms. Thomson advised ██████ that he was being terminated "for cause," which she claimed was based on HR's conclusion that *he* had secretly removed his own Pride flag from his desk and then staged the incident.

158. She further asserted, without evidence, that ██████ had purchased and installed a camera in the office, an accusation ██████ immediately denied.

159. In other words, they terminated him on the absurd theory that he had fabricated the harassment he reported. However, when ██████ asked whether any witnesses to the Pride flag incidents had been interviewed, Ms. Thomson declined to answer.

160. In fact, HR later acknowledged that some witnesses had not in fact been interviewed.

161. While Ms. Thomson said a written summary of findings would follow their meeting, ██████ never received the findings of the investigation.

162. During the meeting, ██████ asked about his accrued PTO, which totaled approximately 46–47 days as of June 2025, and the 10 weeks of parental leave he had never been permitted to use.

163. Ms. Thompson rudely interrupted ██████ and claimed loudly, “We will pay,” assuring ██████ that he would receive the necessary paperwork that same day.

164. No paperwork was sent that day, and when documentation eventually arrived, ██████ was compensated for only about 24 hours of PTO, with no mention, let alone payment, of his remaining PTO, his unpaid parental leave, or any corresponding 401(k) information.

165. ██████ was then terminated for cause. Following his termination, ██████ was escorted out of the building in a manner that was needlessly stigmatizing and profoundly humiliating.

166. After his termination, Human Resources contacted several colleagues and read what was described to ██████ as a “legal disclosure.”

167. Ms. Barresi told ██████ that when she questioned Ms. Thompson, in a way that was “intimidating” and on that call she affirmatively told Ms. Thompson that she believed it was Mr. Saslofsky who had been targeting ██████, Ms. Thompson said she would be “very surprised by the evidence they had.”

168. Later, another colleague, Ms. Popat, informed ██████ that Mr. Gray had also been contacted by the Company’s legal team and presented with the same disclosure.

169. Mr. Rodriguez similarly reported that after [REDACTED] termination, he, too, experienced actions from HR that he perceived as intimidating.

170. In addition, Mr. White contacted Mr. Levesque two days after [REDACTED] termination, asking Mr. Levesque to confirm, word for word, to whom he had disclosed information during his exit interview.

171. Mr. Levesque had previously shared with [REDACTED] via text that his exit interview included statements indicating the discrimination [REDACTED] faced at PartnerRe.

172. Additionally, on September 12, 2025, Ms. Buggy left [REDACTED] a voicemail expressing concern and saying she hoped he was doing better.

173. These contacts raise serious concerns about damage to [REDACTED] professional reputation and potential intimidation of witnesses or colleagues.

174. Around the same time, [REDACTED] had a conversation with Michael Arduini, a long-tenured Investment Portfolio Manager at PartnerRe. During that discussion, Mr. Arduini expressed his disappointment that the Company holds itself out as an organization that values diversity and inclusion, yet plainly fails to live up to those principles in practice. These conversations following [REDACTED] termination underscore that the discriminatory conduct [REDACTED] endured was not an isolated incident, but part of a known and tolerated pattern at PartnerRe.

175. Accordingly, the above recitation of facts makes it clear that PartnerRe has engaged in an unlawful pattern and practice of discrimination and retaliation against [REDACTED] by treating him adversely on the basis of his race and gender in violation of Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (“Title VII”).

176. As a result of the foregoing, Claimant has been unlawfully discriminated against and retaliated against, humiliated, and degraded, and thus has suffered loss of rights, emotional distress, as well as loss of income and earnings.

177. As a result of Respondent's actions, Claimant feels extremely degraded, victimized, embarrassed, and emotionally distressed.

178. Specifically, as a result of the acts and conduct complained of herein, Claimant has suffered and will continue to suffer the loss of income, the loss of a salary, bonuses, benefits and other compensation which such employment entails, as well as future pecuniary losses, emotional pain, loss of enjoyment of life, and other non-pecuniary losses. Claimant has further experienced, and will continue to experience, severe emotional and physical distress.

179. Because Respondent's conduct has been malicious, willful, outrageous, and done with full knowledge of the legion of law to the contrary, Claimant demands punitive and/or liquidated damages against Respondent.

180. Respondent's discriminatory and retaliatory conduct is flagrant, pervasive, and constitutes a systemic pattern and practice of lawlessness worthy of adjudication by the EEOC in light of its national and strategic enforcement plans.

