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Summary

I was employed by SWIFT from February of 1996, through May of 2019. My employment was terminated by the company. The circumstances of my termination are described in the section "Sexual Harassment by Elizabeth Cho, and Trying to Get Evidence."

I was subjected to sexual harassment by women in SWIFT, and related harassment and discrimination by men. This occurred primarily in my last four years with the company, when I began to receive partially effective treatment for hypothyroidism, which had been undiagnosed for most of my adult life. The treatment changed my appearance.

As described in the complaint, my manager lowered my raise and bonus payment for 2019, through dishonesty. That was his attempt to punish me for being targeted for sexual harassment by Archana Deshpande and Grace Hoang. My manager's motives, and HR's cover-up, are described in the section "Sex Discrimination Lowered my Salary."

HR's response to my report of my manager's actions, is one reason I couldn't report sexual harassment. The other reasons I couldn't report it, are described in the section "SWIFT's Accountability for Discrimination."

Almost all of the harassment described in this document, I documented in 2019.

Sexual Harassment by Archana Deshpande

Summary Outline

- 2017
 - On multiple occasions, she created a hostile environment by inappropriately expressing her attraction to me, and that also enraged other men.
- 2018
 - I decided that my best option was to ask Ms. Deshpande for a job. After I asked her, she exhibited anger and hurt, because I had asked a different manager for a job before asking her. This was an issue because she had recently played a game with me in the hallway which was vaguely (or not so vaguely) sexual.
 - She strung me along in my attempt to join her team, until I played a quid pro quo sexual game with her, i.e. spending hours looking up her skirt, which I had to do on two occasions.
 - In late 2018 there were indications that once I joined her team officially in 2019, she would expect there to be some kind of office relationship, albeit nonverbal and non-tactile. These incidents were disturbing, and I hadn't anticipated a continuation of the quid pro quo.
- 2019 – These events occurred between late January and May 9.
 - Ms. Deshpande and Preeti Parmar, a young woman who was giving a presentation, were competing for my attention. Ms. Deshpande forced me to rebuke Ms. Parmar, which I did by ostentatiously walking out of her presentation. This angered and alienated people in my new organization, like Sohan Sharma, the organizer of the presentations, who subsequently ignored my email.
 - On two occasions, it was a problem for Ms. Deshpande that I was talking to other women in the office. I then began to view with stress the prospect of talking to female co-workers.
 - There were incidents of sexual flaunting by Ms. Deshpande, for my benefit, which were very provocative. This enraged at least one of my teammates.

- There was an expectation that I sit at a workstation a few feet from Ms. Deshpande. There were games when she would pose and make faces for me. On at least one occasion, it was a problem because I didn't choose to sit near her.

Detail

Early in 2017, I was in a meeting with Shirish Lawate. Ms. Deshpande walked past the conference room, and as she looked at me through the open door, she pantomimed screaming, while bending at the waist. She was making the statement that she thought I was handsome that day, but in the moment, I interpreted it as hostility, and I braced for a confrontation. Shortly after that, she walked by again and looked in, and I instinctively looked at her as if I were ready for a fight, which caused her to assume a strangely submissive posture as she walked away. If Mr. Lawate realized what was happening, which is likely, then this incident also harmed me by adding to his motive to harass me.

Late in 2017, Ms. Deshpande harassed me again, in a similar but more damaging way. She did that, despite the fact that she knew I had been angry about it the first time. We were having our team meeting in a conference room with glass walls, and while I was looking down at my laptop, Ms. Deshpande walked straight toward the glass as if she were going to crash into it, until I looked up. Then, she looked at me with a smirking smile as she veered back to the corridor. This enraged my teammate, Guna Kota, who was sitting near me. His eyes were bulging out of his face to a remarkable degree, and he looked as if his head were going to explode. Mr. Lawate was sitting on the same side of the table as I, and undoubtedly witnessed it, as did others. I certainly suffered due to that. What made this problem much worse, is that most or all of the other men in the conference room were Indian, Ms. Deshpande is an attractive Indian woman, and I'm white.

The following incident shows how I communicated to Ms. Deshpande that I was angry about her behavior. Not long after the previous incident, I was in a similar meeting. Ms. Deshpande was walking towards the conference room, and although I wasn't consciously aware of her, on some level I saw her approaching in my peripheral vision. I suddenly turned my whole body to give a hard look at Ms. Deshpande, as if I were warning her that I wouldn't tolerate any more incidents as in the past when she saw me in conference rooms. She was angered by this, so after she walked past the conference room, and was about to leave the area, she turned around suddenly and looked at me accusingly, as if to catch me looking at her. She was in my line of sight at that moment because she was directly behind whoever was speaking in our meeting.

The following occurred in early 2018, and is relevant to subsequent harassment by Ms. Deshpande. I replied on an email thread about a technical issue. Many people, including Ms. Deshpande and other managers, were on the thread. Ms. Deshpande showed that she was

angry about my reply when she saw me in the break room. She stood still until I turned and looked at her, then she exploded past me in anger. Shortly after that she replied to my note, and attempted to refute my points. I replied again, refuting her points, so I assumed that she would be even angrier. Instead, the next time I saw her, she made a game out of letting me know that she conceded my points in the email thread. I was walking in the hallway, and when she saw me coming, she started walking across my path at right angles, right in front of me. This was an obvious game; she was heading straight for a railing, leaning far forward, looking at the floor, walking slowly, her hands behind her back, a playful expression on her face, and wearing a sexier skirt than usual. She was making a submissive, slightly sexual statement to me that she was conceding the points in the email thread.

In 2018 I was desperate to transfer to a different team, due to an escalation in the harassment I was receiving from my manager Shirish Lawate (which was caused by my response to the sexual harassment I received from Grace Hoang). However, over the years I had been singled out for harassment by individuals from the software development teams that are based in Manassas, and the problem had become much worse after my response to Ms. Hoang's harassment. So I thought the only viable option was to transfer to one of the two development teams in the internal organization known as FIN. FIN seemed to be somewhat segregated from the rest of the company, both culturally and in their work. I had only occasionally interacted with software developers in FIN. Ms. Deshpande was the manager of one of the FIN development teams, so I sent a note to the manager of the other team asking if he had any openings. He replied that he didn't, but that Ms. Deshpande had openings on her team, and I should ask her. I was angry that asking Ms. Deshpande for a job was my best option, and I took some time to decide. I finally I forwarded the note from the other manager to Ms. Deshpande, and asked about openings on her team.

After I forwarded the note to Ms. Deshpande, she let me know that she was angry with me. She communicated it very clearly with looks and gestures. This was a 180° change from her recent hallway game, and it was obvious she was angry that I had asked the other FIN manager for a job before asking her. She probably wouldn't have been angry about this if she had refrained from playing the game in the hallway. She ignored my note for almost two weeks. Eventually I had to talk to her face-to-face, and she instructed me to set up a one-on-one meeting to discuss joining her team. However, she repeatedly cancelled and rescheduled the meeting, which was probably punitive. When the meeting finally took place, she said she would have openings on her team that would be suitable for me, but her tone seemed to be that she wasn't really interested in having me on her team, or that it might not happen. She said she would let me know when there was a job posting which I could apply for. Shortly after that, one morning in the cafeteria she positioned herself where I would see her standing and facing me; she was making a clear statement with her face and body language that I had hurt her.

As time went on, I had the impression that I had to do something to persuade Ms. Deshpande to follow through with bringing me onto her team. One day I decided to spend the day working in the area of the office where Ms. Deshpande worked nearly every day, so I'd be on her radar. Then I received an email from Mr. Lawate which enraged me, and so I got up and went for a walk. I saw Ms. Deshpande standing in the break room, facing away from me. I looked at her as I continued walking, and when she turned around she saw me looking at her with an intense look. I lowered my gaze after one second or less of eye contact, and proceeded past the break room. I wasn't trying to communicate anything to her, other than acknowledgement all of her nonverbal communication with me, so that she would proceed with bringing me into her team.

Shortly after that, both myself and Ms. Deshpande returned to our workstations. She was sitting about ten feet from me. I soon noticed that from my vantage point, I could see far up Ms. Deshpande's skirt, and I was panicked that I had an inappropriate view. I took my laptop to a standing desk that was diagonally behind Ms. Deshpande, but still close to her, so I'd still be on her radar. Shortly after that, Ms. Deshpande got up and violently stormed away with the angriest look on her face that I'd ever seen anyone have in the office. It hadn't occurred to me that the only reason my view of Ms. Deshpande seemed inappropriate, was that she was moving her knees up and apart in unusual poses, to provide me with that view. She was enraged by my rejection of it.

At that point I knew there was no chance I could ever join her team. The next day was my work-from-home day, but I came to the office. I arrived very early, to ensure I was in the same chair as the day before when Ms. Deshpande arrived at her usual workstation. Normally, I don't have caffeine, because of my medical conditions. However, that morning I had a few glasses of diet Pepsi in the break room, in case it would help me deal with the situation. When Ms. Deshpande arrived at about 8:30, I was in the same chair. I noticed that she was wearing a shorter skirt than I had ever seen her wear before, or since. I realized that her intent in wearing a shorter skirt was to facilitate providing me with a view up her skirt. And, although I usually don't notice women's shoes, I noticed that she was wearing beautiful, sexy, minimalist shoes. She sat at her workstation, and immediately started doing what she had done the day before, i.e. moving her knees up and apart to give me a view up her skirt. I sat there and looked up her skirt for a few hours. Towards the end of that time, she extended her legs in front of her, and hiked up her skirt far enough that her entire legs were visible, as they would appear if she were poolside. She only did that for a relatively short time.

Lingaraj Bagali was sitting near us that morning, and he is a witness to Ms. Deshpande providing me with a view up her skirt, and myself looking at that view. Toward the end of the period when I was looking up Ms. Deshpande's skirt, Mr. Bagali spoke to me with an uncharacteristic unfriendly and dismissive attitude, which surprised me. The reason it was so obvious to him and others in the area that Ms. Deshpande and I were playing this game, is that she was doing so much to provide me with a view up her skirt. She hooked her shoes on a circular metal rung of her chair, which allowed her to prop her knees up higher, and she moved her knees apart,

and she turned her right leg out farther than her left, so that my view wouldn't be blocked from the angle where I was sitting.

Also, for the relatively short time that she had her legs extended in front of her, with her skirt hiked up far enough to provide me with a view of her entire legs, I couldn't see her skirt from where I was sitting, but it must have been jarring to others in the area to see her skirt hiked up so far and in a way to provide me with that view.

All of that explains why I received the unpleasant attitude from Mr. Bagali. Presumably Mr. Bagali didn't know that I was only looking up Ms. Deshpande's skirt because I had to, to get a job. But I doubt he gave that same unpleasant attitude to Ms. Deshpande.

From my point of view, what Ms. Deshpande was doing was very provocative, and that created frustration that persists to this day, over two years later.

I should note that although Ms. Deshpande was trying to accommodate the angle of where I was sitting relative to the direction she was facing, by turning her right leg out more than her left, so my view up her skirt wouldn't be blocked, that because of that angle I still couldn't see her crotch, I couldn't see her panties. I had a good view of the inner part of her thighs. She might not have known that I couldn't see her crotch.

Mr. Bagali is the only witness I can name to this particular sexual game of looking up her skirt for hours, although there had to have been others who knew what we were doing on this occasion and the other time I had to do it.

This all occurred in the morning hours. Later, Mr. Lawate saw me in the cafeteria, and his reaction was very different than all the other times he'd seen me in the office on my work-from-home day. He looked up at me with an expression that said my presence in the office explained something. After I spent those hours looking up Ms. Deshpande's skirt, she must have immediately told Mr. Lawate that she was going to take me from his team. Shortly after that, when he saw me in the office on my work-from-home day, he knew that something had gone on between myself and Ms. Deshpande that morning. He would have seen the way she was dressed that day, in preparation for me looking up her skirt, which would have made it more clear to him, and would have further inflamed his jealousy and anger.

I worked from home the next two days, then came to the office. I again thought I should work in Ms. Deshpande's area, but I didn't sit in the chair from where I had been looking up her skirt. Instead I sat at a workstation in an adjoining room. In the early afternoon, when I was coming out of that room, Ms. Deshpande signaled me that I should return to that chair, and spend more time looking up her skirt. That day, it was physically uncomfortable for me to force myself to sit in that chair for a few hours, but I had no choice since I wanted to transfer to her team. So, I went to that chair and spent those few hours looking up her skirt while she moved her knees up and apart, just as before.

That day, she signaled me to go to that chair in the following way. There is a very small room that's suitable for one person to make a phone call. Ms. Deshpande waited in that room, probably for quite a while. Then, when I came out of the adjoining room where I was working, and I walked past that tiny room, she came out and forced me to awkwardly step aside to avoid a collision with her.

Between this time, and the time that I officially joined her team, she did some things to imply that we were in a relationship, albeit a non-verbal and non-tactile one. Then, in late December or early January, I discovered something that I hadn't expected. Ms. Deshpande was very excited about me joining her team, and the continuation of our non-verbal, non-tactile relationship would become more disturbing and problematic.

Around the time of our orientation meeting, she did two strange things that made me realize that she expected to continue playing inappropriate games after I officially joined her team. I hadn't expected that; I had assumed that being forced to look up her skirt for hours, and so on, was the price for joining her team, but that those kinds of games wouldn't continue after my transfer was finalized. Within a few days of the orientation, when she arrived in the office and was putting her things in her locker, she looked at me with a smirky, excited snarl. Then she literally ran to where I was, and stopped suddenly a few feet from me. I was getting up from a chair at the time, and when I looked at her, she looked away playfully and excitedly, and maintained a slightly crouched, playful posture. I found it surreal and disturbing that this was done in full view of others.

In January, there was a week of FIN classes which I attended. One presentation was made by a young woman, Preeti Parmar, and it was also attended by Ms. Deshpande. Ms. Deshpande wasn't present for most of the presentations that week, and I think she attended that one because it was given by an attractive young woman, and I would also be there. During the presentation, Ms. Parmar sustained eye contact with me for an unusually long period of time. Shortly after that, there was a Q&A period. Ms. Deshpande started to ask the first question, then someone on the speakerphone began to speak over her. Ms. Parmar then cut off Ms. Deshpande, saying "we'll come back to you." It's very likely that Ms. Parmar had muted the phone, because she knew that Ms. Deshpande would ask the first question in the Q&A period, because Ms. Parmar had been sustaining eye contact with me for such a long time. And, Ms. Parmar expected that someone who had dialed into the presentation from a remote location would ask a question, and speak over Ms. Deshpande, if the phone were muted, and that would give her the opportunity to disrespect Ms. Deshpande.

During the break, while I was getting water in the cafeteria, Ms. Deshpande stood near me and looked at me harshly, letting me know that she wanted me to rebuke Ms. Parmar. Ms. Deshpande was not in attendance after the break. Shortly after the presentation resumed, I ostentatiously grabbed my bag and walked out, while Ms. Parmar was speaking. Later that afternoon, I sat at a table near where Ms. Deshpande was working. When she saw me there, she took her laptop and went somewhere else, angry because she thought I hadn't dealt with

Ms. Parmar. So I texted her and told her how I left the presentation shortly after the break. Ms. Deshpande then returned to her original location near me, and then replied positively to my text.

I sent an email to the organizer of the presentations, Sohan Sharma, asking for the location of a document in the document repository. He had encouraged us to send him those kinds of questions, but he ignored my email. He had been present when I walked out of the presentation, and I'm sure that's why he ignored it. Weeks or months later, Ms. Parmar also had a negative reaction to me, which was obviously a response to that incident. She got up and left a meeting when she saw me sitting nearby, through the glass walls of the conference room she was in. That's at least two people in FIN whom I had alienated when Ms. Deshpande forced me to walk out on her talk.

In the presentation I walked out on, I had to deal with manipulation by another female attendee, so I felt like I was under siege that day. A young woman, who was based in another location, had made an effort to befriend me the day before. That day, the next day, through deep manipulateness, she tried to give me the opposite impression. However, when she saw Ms. Parmar sustaining eye contact with me, she again tried to reverse what she was doing. That woman's manipulation also took a lot out of me that day, but it was typical of what I experienced from women in that company.

After the FIN TOIs, I began working with the rest of Ms. Deshpande's team, and attending team meetings. In the first regular team meeting that I attended, I noticed that she wasn't wearing her wedding ring, which I thought was unusual. She was also wearing the sexiest pants I had ever seen her wear, and she was probably more attractive than usual in other ways that day. I tried to make eye contact by looking at her steadily, because I thought it was expected, and one of the team members had a strange reaction to that. After the meeting, when I was sitting at a workstation, Ms. Deshpande walked toward me, and got me to look up at her. She then made a personal facial expression of some kind, then she sat at her workstation. I immediately texted her and asked if she minded if I sat in that spot, in case she was uncomfortable with the location of my workstation relative to hers. She replied "not at all", then she stood up and started to leave. However, she stopped cold after a short distance, and provocatively stood there, giving me a long look at her buttocks in the sexy pants she was wearing that day. Then she took one very small step, and again froze in another provocative pose for a while longer, giving me an even longer look. She might have repeated that one more time before proceeding. She was wearing womanly shoes with elevated heels, which she normally didn't wear, which added to the effect. The whole thing was distracting and frustrating. It would have been very obvious to others in the office who observed this, the game she was playing with me. Later that day, in a team meeting, I was looking at Ms. Deshpande's legs (her legs weren't actually visible, she was wearing pants), and then I looked up at a team member who was observing me, Gaurav Maheshwari. By his reaction, i.e. violent head movement and enraged expression, he was extremely angry. The only explanation for his reaction is that he

had observed our sexual game earlier that day. I had been affected by all of Ms. Deshpande's sexual games, and as a result I was looking at her in a mildly sexual way in a team meeting. All of that was causing problems with my new teammates.

After I started working with the rest of the team, I would usually sit in a workstation very close to Ms. Deshpande. The following occurred while I was sitting near Ms. Deshpande, in February.

Ms. Deshpande walked past me, and she saw that my left hand was resting on my lap, on my crotch. I didn't intend that as a sexual statement, but Ms. Deshpande reacted to it. She had a playfully concerned look as she sat down. A few minutes later, she got my attention, and gave me a big animated smile, while averting her eyes. However, I don't believe I was sitting in an inappropriate way, and it was the sexual games she had been playing with me that caused her to view it as something sexual.

A day or two after that, Ms. Deshpande gave me a prolonged show of repeatedly bending over, extremely provocatively, while facing away from me, and wearing nearly form-fitting pants. She was about five feet from me. She did this around lunchtime, so there would be few people in the office work area. She made it as provocative as possible; e.g. for her first pose, she bent over as far as she could, while keeping both legs as straight as possible, so that she could have kissed her shins, and she held that pose for a while. It was strange to see her face completely vertical, but upside-down. For that pose, she was at a small angle, so her buttocks weren't quite facing me directly, and that's probably because we weren't alone in the office work area. When she was finally finished with all the bending over poses, she turned around so she was facing me. I quickly pulled my chair closer to my desk and sat up straighter, as if I were asking for more. She abruptly turned back around, and bent over one last time, acceding to my nonverbal request. I did that so she wouldn't think I didn't appreciate it, and also because I was caught up in it. Beginning with her initial pose, I was upset, and frustrated, in a way that I wouldn't have been, if we were actually sleeping together. To this day, the memory of her buttocks in that initial pose, is upsetting to me. That day, after her poses, I was in a state of mind that made it impossible to work for quite some time. It's difficult to describe my mental state at that time.

Later that day, I introduced myself to a female co-worker who was sitting near me. Near the end of my conversation with her, Ms. Deshpande walked by and overheard it. She then gave me a look that was clearly intended to communicate that she didn't like me talking to another woman in the office.

Another day, Ms. Deshpande walked by my workstation, and saw that I had a texting history with an attractive female employee. It was immediately obvious that she was very upset, or freaked out, and that continued for about a day or two.

After that, interactions with female co-workers, especially attractive ones, caused me stress, because I feared Ms. Deshpande's reaction.

The following paragraphs describe Ms. Deshpande's expectation that I sit at a workstation very close to her.

In late January or early February I began to work with the other team members, and to attend team meetings. From that point on, there was an expectation from Ms. Deshpande that I would sit very close to her in the office, unless there were some unusual circumstances. Ms. Deshpande sometimes exploited our proximity in order to play games that involved her posing and making faces for me, and I played along with those. During one such game she let me know that I was looking at her too directly for too long, and so I looked away, but the game continued and I resumed looking at her seconds later. The incidents of her severe buttocks flaunting occurred less frequently, but more than once.

When I began to fight Mr. Lawate's dishonest actions to lower my salary, there were some illustrations of Ms. Deshpande's expectation that I sit very close to her in the office. Shortly after I forwarded a note to Ms. Deshpande, that I had sent to HR to notify them of Mr. Lawate's dishonest behavior from 2015, her attitude toward me changed 180 degrees, and she became obviously hostile or passive-aggressive. So, I moved to another wing of the office. Within a day or two, Ms. Deshpande's attitude reversed again, and she wanted me to return. She communicated this to me in ways that included wearing pants that had coded meaning, i.e. the pants she had worn when providing me with bend-over poses. However, I still didn't return to her side for a couple more days. The day before I returned, we saw each other as we were walking to the team meeting, and she realized at that moment that I was in the office but not sitting by her. I said hello but she responded with severely hurt body language, which was surprising and a little disturbing. The next morning, when I sat at a workstation across from her, she immediately got up and walked away as if hostile. But she returned shortly after that and gave me a look that said that she didn't want to fight.

When I first decided to notify HR about Mr. Lawate's actions, I sent Ms. Deshpande a note saying that I might be sitting in a different office wing for the next week or so, because I didn't want to be anywhere near Mr. Lawate. She didn't respond to the note at first, but then on Monday morning, when I sat by her anyway, she immediately responded to the note supportively. I think it had been a big issue for her when I said I wouldn't be with her.

After being forced to play these sexual games with Ms. Deshpande, my sexuality has been disturbed. To this day, I feel frustrated and upset when I think about her in the skirts that I had to look up, or when I remember her buttocks posed for me while she was severely bent over. Ms. Deshpande derived gratification by forcing me to watch her do those things, but she didn't care about the effect it had on me. She saw it as an entitlement. In February of 2020, I was watching the movie Star Trek IV, when I started to feel disturbed and frustrated. Soon I realized that the reason I was having this reaction, was that an actress in the movie was wearing a pleated skirt of a solid light color, similar to the skirts Ms. Deshpande often wore, and that she wore the second time I had to look up her skirt for hours. It didn't matter that the skirt the

actress was wearing was of a thinner material, and was longer. It was similar enough to have that effect on me.

Shortly after my employment was terminated by SWIFT, I sent Ms. Deshpande an email asking if she would be a reference for me as I applied for jobs. She didn't reply.

Sexual Harassment by Grace Hoang

Summary Outline

- I sent Ms. Hoang a friendly email after she had been embarrassed by a couple of incidents.
- She spent several weeks trying to entice me, by giving me provocative looks and poses, and other signals. She didn't do this with a high frequency, but it was enough to keep the issue alive, so that her manipulation described in the next bullet would work. I didn't respond to what she was doing. For me, this caused anxiety, frustration, and guilt. It also caused major problems with other people.
- After several weeks, she finally showed angry and defeated body language, because I still hadn't approached her. I was influenced by this to send her an email saying that I hadn't spoken to her because of medical problems. She replied and said she wanted to talk once my health had improved.
- I discovered that she was trying to set me up, so that she could portray that she was terrified of me as if I were a rapist, and then develop a relationship with me in which I'm in a lowly state relative to her. She obviously felt the need to counteract the impression that was created by the earlier incidents in which she had been embarrassed. This was deeply upsetting and stressful for me.
- I was certain that she had twice posted "throwaway" comments on an electronic message board, comments whose purpose was to force me to see her photo and name on a daily basis. After what's described in the previous bullet, I posted replies to her most recent comment on the board, with an alternate suggestion, as a coded message that I would no longer tolerate her abuse of that board for purposes of manipulating me.
- The company became a surreal, hostile environment for me, because of my replies to Ms. Hoang on the message board.
- Ms. Hoang reacted to my replies on the board by trying to reverse her earlier portrayal that she was terrified of me, and when that didn't work, with inappropriate sexual flaunting, in view of other people, and then with hostility.

Detail

Ms. Hoang and I had no personal interactions prior to 2017, except for the following incident from December 2012.

Ms. Hoang and myself were standing next to our respective cars in the parking lot. I was standing still and facing her. She started to walk towards me as if she thought I was attempting to engage her in conversation. I awkwardly turned away and walked toward the building. This was just an awkward moment, but I sent Ms. Hoang an apology note. I don't have the note, but I've memorized it, and also her response to the note. My note was the following:

Grace,

I want to apologize for acting strangely in the parking lot last week. It was not my intention and I feel very bad about it. Again I apologize.

Sincerely,

Paul

Her response was the following:

Paul,

It was no problem at all, thanks 😊 I hope you had a good holiday!

Kind Regards,

Grace

The sequence of events pertaining to sexual harassment by Ms. Hoang is described below. It begins in early 2017.

1. There was an incident in a conference room in which she was acutely embarrassed. This was the motivation for some of her sexual harassment that occurred later. And, a couple of weeks before the incident described here, there was another incident where she might have been embarrassed by her over-eagerness in seeing me after she had spent time overseas.

I was in a meeting in a conference room with one other person, Shirish Lawate. I was sitting in the conference room facing the open door. I became aware that there was someone standing outside the door, but I didn't know who it was. Then this person, who was Ms. Hoang, walked into the room, and slowly approached me. As she continued to approach me, I stopped talking to Mr. Lawate, and made eye contact with her. Her eyes were huge. Then, when she was fairly close to me, she abruptly turned and ran out of the room. At no time did she say anything.

2. She changed her appearance in the office, and became conspicuously more attractive.
3. She posted a comment on an electronic message board that was widely visible within the company. Her comment seemed like a "throwaway" comment, and so I thought that her real reason for posting it was so that I would be forced to see her photo and her name on a daily basis.

4. Because of her embarrassment in the conference room, and her apparent response to it, I thought the decent thing to do would be to send her a short email, welcoming her back from the overseas assignment that she had had prior to 2017. The note was very brief, and friendly, nothing more. She responded very appreciatively to the note.
5. She began to give me provocative looks and poses, and other signals, in an attempt to influence me to reach out to her. The first time she did this was at Tech Day, and it caused major problems for me with others. Prior to her manipulation that is described in the next item, I only remember two of her blatant poses/flirtations, and one smaller signal, but she was doing enough to keep the issue alive, so that the manipulation described in the next item would work. There was probably more that she did in that particular period that I don't remember now.
6. There was a stark change in Ms. Hoang's body language when she saw me in the office. She was defeated, and angry, because I hadn't responded to what she had been doing. She was making me feel guilty, so I replied on the email thread that we had established as described in #4. I told her that I felt bad that I hadn't been able to talk to her, but it was because I was struggling with medical problems. She replied supportively, and said that we would talk after my health improved. At no time did I have any desire to establish a personal relationship with Ms. Hoang, but being forced to deal with her inappropriate behavior in the office, and then her angry body language when I didn't respond to her, influenced me to send that note.
7. I discovered that Ms. Hoang was exhibiting a predatory behavior pattern. I had already been subjected to other variations of this pattern earlier in 2017, by two other female co-workers. Ms. Hoang's plan was to develop a relationship with me, after she had put me into a lowly position relative to her, by portraying that she was terrified of me as if I were a rapist. This was intended to negate the perception that had been created by the previously described embarrassing incidents, i.e. she wanted to negate the perception that she liked me more than I liked her. Ms. Hoang attempted to negate that perception on August 25, 2017, by essentially framing me for rape. I couldn't forgive that, and I also couldn't any longer forgive Ms. Hoang's inappropriate behavior over the prior weeks, which had caused problems for me with others, and had caused me anxiety and guilt.

Ms. Hoang framed me as follows. She was sitting in a chair in the main hallway on the second floor, working with her laptop. She was alongside a primary traffic path; people were walking past her to and from the stairwell, bathrooms, and different office wings. Many, many people were walking past her as she sat there and worked. However, after I walked past her, I sensed something that made me look back over my shoulder, and I saw her suddenly turn back away from me with a terrified, whole-body reaction. It was as if she were on a park bench, and had looked up from her laptop because she thought a rapist was near her, and then turned away in terror when he looked back at her. Then, fifteen minutes later, she did something else that was intended to make the same

statement. There were two chairs in the hallway next to each other, one adjacent to the traffic path, and one against the wall. Ms. Hoang had been sitting in the former chair. However, fifteen minutes after she portrayed terror of me, I walked to the bathroom, and observed that she had moved to the other chair, the one against the wall, away from the traffic path. And, she was manifesting a markedly different body language, i.e. she appeared to be cowering there against the wall. When I came out of the bathroom, she was gone. She wanted to create the impression that seeing me the second time so terrified her that she could no longer remain there at all.

As I describe below in #10, Ms. Hoang later tried to reverse or take back her “framing”, in a way that demonstrates that she was aware of what she did, and that it was deliberate.

In my experience, this basic behavior pattern is common when a perception has been created that a woman likes me more than I like her. In a professional office environment, it is much more problematic for me, although it’s always upsetting. The other two women in SWIFT who perpetrated this pattern in 2017 hadn’t pretended to fear me, but it was the same basic pattern.

8. The day that she “framed” me, I was having difficulty believing that she would do that to me, and I was freaking out. So, I replied on our email thread, and asked for her personal email address. However, a few minutes after sending that note, I regretted it, and I knew I wouldn’t reply again whether or not she provided her personal email. She replied, and refused to provide her personal email, but she also tried to keep our conversation going; she inquired if everything was OK with me. I never replied nor answered her inquiry.
9. I went on a vacation of three or four weeks, and when I returned, it was the first time that Ms. Hoang and myself were both in the office since she “framed” me. A few days before I was due to return, Ms. Hoang posted a comment on the same message board mentioned in #3. It looked like another throwaway comment, and this time I was certain that her only reason for posting it was to manipulate me, i.e. to force me to see her photo and name on a daily basis. I could no longer tolerate Ms. Hoang abusing that message board for the purpose of manipulating me, so I posted an alternate suggestion to the one in her post, which was actually a coded message to Ms. Hoang that I wouldn’t tolerate her abuse of that board any longer. However, nobody else should have interpreted my comments on the board as any kind of personal slight of Ms. Hoang. The comments were useful, intelligent, and professional, and in no way could they be construed as a slight of Ms. Hoang. Ms. Hoang’s first reaction to my comments was to try to reverse her portrayal of terror, then she showed desperation with more inappropriate behavior, and then hostility. The reaction of the rest of the company was incredible, and is described in another section.

10. My reply to Ms. Hoang on the message board was replied to by the woman in charge of the board, and then I immediately posted my second and last reply. The next day, Ms. Hoang reenacted the incident in which she had tried to convince me that she was terrified of me as a rapist, but this time she acted out a different ending, so as to take it back. In the morning, she was waiting for me in the same chair described in #7, in the main hallway on the second floor. I walked past her, across the catwalk to the front building, but all the suitable workstations there were occupied since I had arrived late due to a doctor's appointment. So, I walked back across the catwalk to find a workstation in the office wing known as the "swing space," which was near where Ms. Hoang was sitting, and is where I had been sitting when she "framed" me. As I approached her, she did something strange with her body language, but I didn't think about it. I went into the swing space and walked past roughly fifteen rows of workstations, about halfway to the last row, then turned into one of the rows and set up my laptop. Shortly after that, I noticed that she was sitting next to me, working with her laptop. There was an empty chair between us, but she was next to me. So, after I replied on the message board the day before, she was waiting for me the next morning in the chair where she had "framed" me, and when I walked past, she got up and followed me into the swing space, and set up her laptop next to me. She was making the statement that she would no longer pretend that I'm a rapist. I was angry, and I packed up my laptop and moved to another wing of the office. I was especially angry because of the reason that I had been subjected to her manipulation. It's not because she was someone who I was interested in. Instead, I had been forced to deal with the inappropriate behavior of a woman in the workplace who I wasn't interested in, and that went on for an extended period of time, and it caused multiple problems, and it eventually involved a horrible manipulation.
11. A couple of weeks later, the following happened. I was walking in the office, I turned a corner, and then Ms. Hoang and myself were walking towards each other, separated by twenty or thirty feet. She was walking with others, or was in the vicinity of others who were walking in the same direction. She saw that I was immediately going to turn again, and that we'd only be facing each other for a few seconds. So, she did a rotating jump-stop, i.e. she suddenly stopped walking and quickly turned around, and then just stood there with her back to me. Her body language was that she was blatantly displaying her buttocks to me, as if that were the complete opposite of portraying fear of me as a rapist. This was problematic for me for different reasons:
- a. Others saw what she did, and it contributed to the pattern of harassment and discrimination that I had always received from men in the company.
 - b. I was sexually aroused and frustrated after seeing her do that.
 - c. It was also stressful, because with her actions, she was making the statement "take me from behind."
12. Not long after the previously described incident, Ms. Hoang and myself found ourselves walking toward each other in the hallway. She was glaring at me with open hostility,

she was looking right through me. I was forced to veer off and go into the restroom just to avoid her. Later that day, she tried to reverse that, in the following way. She saw me in a chair with my laptop, at a long distance from her. She walked towards me with a very silly grin or smile on her face, which she maintained the whole time as she walked all the way to the area where I was sitting.

13. Another time that we found ourselves facing each other in the hallway, she stopped and looked at me. I might have slowed down or stopped because she did, and I was looking down. When I developed an annoyed affectation, she loudly and angrily stomped away. The next time we passed in the hallway, she behaved differently. I immediately had an angry expression on my face, and she smiled and looked down as she happily walked past.
14. In 2019, in view of the harassment that I was being subjected to by countless people within the company, and most of it was due to Ms. Hoang's harassment, I decided that I would eventually try to have a conversation with her and surreptitiously record it, to prove her harassment. As a result, there were two occasions in 2019, one in which I didn't respond negatively to her looking at me, and one where I gave her a subtle signal that I might want to talk to her. She responded positively both times. I never actually attempted to have a conversation with Ms. Hoang and record it. I was waiting until I was in better health and better shape, so I would have a better chance of success.

I have the email thread between Ms. Hoang and myself from 2017.

Sexual Harassment by Elizabeth Cho, and Trying to Get Evidence

The discrimination perpetrated by Ms. Cho primarily consisted of an incident in which she caused several other people to believe that I had done something horrible to her, a young woman. As a result, I received hostility and disrespect from one of those other people, as well as hostility and disrespect from Ms. Cho herself. I also had the knowledge that other colleagues believed I had behaved very badly towards a young woman. That's described below, but I also describe additional issues involving Ms. Cho, since they are related to my termination.

Elizabeth Cho was a young software developer who I had seen around the office, but I had never communicated with her, and I didn't know her name. In early 2017, on at least two occasions, she gave me obvious signals that she wanted me to ask for her phone number or ask her out. Then, because she was upset that I didn't respond to her signals, she gave me hostility, disrespect, and essentially slandered me. That occurred in an incident that was triggered by her hearing me speak in a way that she found attractive. That incident also caused a different woman to give me hostility and disrespect, a day or two later, and it also caused several other people to believe that I had exploited Ms. Cho, a very young woman, in some sexual or romantic way. The root causes of these incidents, are that Ms. Cho was angry that I didn't

respond to her signals in the office, and that she discovered she was more attracted to me when she heard me speak in a particular way.

The incident was the following. Ms. Cho came and sat next to me because she wanted to sit next to her friend, Apoorva Neti. There was an open chair between me and Ms. Neti, which Ms. Cho took. One of my teammates came to talk to me, and was sitting on the other side of me. At one point I began speaking to him in a way that I suspected Ms. Cho might find attractive, and she had a violent reaction to it. She shot up from her chair, while making an angry sputtering sound, and then she said to Ms. Neti in an angry and disgusted way "I'm going for a walk" and left the area. That was an obvious reaction to hearing my voice. Sometime in the next couple of days, Ms. Neti saw me walking in the hallway, and she openly gave me a hostile, disrespectful gesture, which I wouldn't expect to see in a professional office. Several other witnesses to the first incident got the same impression as Ms. Neti, that I had done something terrible to the young woman, Ms. Cho. I don't know if Ms. Cho told lies about me to Ms. Neti.

Shortly after this incident, Ms. Cho changed her Facebook photo to a picture of herself winking at the camera. I thought this was probably for my benefit, and it meant that she wanted to apologize to me. I liked the idea that she would apologize, so on the day that she was due to return from vacation, I sat in the spot that she usually occupied. She saw me, and sat a few rows over, then moved to another location. My impression was that she wanted to play games, and that she wasn't going to apologize. Shortly after that, we passed in the hallway, and I think she read my body language that I didn't want to talk with her. We never spoke. I was aware of her Facebook because when she was trying to get me to get her number, I checked if she had a presence in social media. On Feb. 23, 2020, her Facebook photo is the same picture of herself winking at the camera that she set in 2017 shortly after the upsetting incident.

In the late summer or early Fall of 2018, Ms. Cho gave me a signal again, but it wasn't a typical kind of signal. While I was sitting and working, she walked slowly past me looking at her phone. Then, when she was about 10 feet away, she suddenly did a twirl, like a dancer's twirl. Her hair flew up, and at the end of the twirl she was facing me, making eye contact, with a huge smile in her eyes and her face. It was awkward when I looked away.

In December 2018, Ms. Cho did something strange. I was sitting and working, and she was walking across my field of view, and she looked at me and maintained eye contact with an emotional look on her face, which I didn't understand. I realize now what it meant; she had decided to leave the company and change jobs, because her pride wouldn't allow her to be around me after I ignored her latest, flagrant signal. Around the same time that she gave me that signal, three women who worked at the shopping center near my home either quit their jobs or transferred to other locations, shortly after I didn't respond to their signals. She wasn't the only woman at that time to leave her job when I didn't respond to her.

In early January, I arrived at the office early one day, while it was still almost empty. Ms. Cho arrived shortly after, and set up her laptop at the workstation directly across from me, despite the fact that almost all the other workstations were still available. After she did that, I knew that I would be too angry to sit across from her for the entire day, so I disconnected my laptop and moved to a nearby workstation. She probably interpreted that as a slight, but I wasn't making a hostile statement, I just knew I couldn't stay there all day.

In February, Ms. Cho sent a farewell email announcing that was leaving the company. I had been hoping to obtain evidence from many of the sexual harassers of their harassment, and I thought this meant that I had lost the opportunity to obtain proof of Ms. Cho's harassment. She included her personal email address in her farewell note, so I sent a short note to her personal email which was impersonal, but I hoped she might reply to it. Shortly after that, I discovered what my previous manager had done to my performance appraisal document. That was the latest attack in a series of attacks that I'd withstood in that company for years, and it caused a stress reaction, primarily because I knew immediately that he would get away with it. The stress reaction caused my thyroid blood tests to show that my TSH was double what was expected. And, a dermatologist asked me what was wrong with me as soon as he saw me in the exam room. I.e., he asked how I was, I said I was fine, and he said "are you sure?" Some kind of limit had finally been breached for what I could tolerate.

A month and a half later, I was desperate to obtain evidence against the company. So, I sent more emails to Ms. Cho, in hopes of obtaining evidence of her sexual harassment. If I immediately discussed her harassment in an email, she wouldn't admit to it. So, I sent her two notes that asked if she wanted to meet me for a meal, and I gave the impression that I was interested in her. I thought this would be necessary to address her wounded pride, and the anger that she felt she had to leave the company because of me. Then, a week later, I sent her one last email, that was of a different nature than the previous ones. It referenced her harassment, and discussed how its effects were worse than she knew, because it caused Ms. Neti to disrespect me, and it gave others who witnessed it a similar impression of me. And, my anger over that is why I moved to another workstation that day in January. She responded to that last email by contacting SWIFT HR and asking them to ask me to stop emailing her.

The second note I sent her said that I hoped she hadn't left SWIFT because I didn't respond to her signals. I said that lots of women in the office did what she had done, and I never responded to any of them. She replied by saying that she had never been interested in me. I would have expected her to reply in that way, given her wounded pride, her anger over having to leave the company because of me, and her anger when I moved to another workstation in January. She didn't say "I'm not interested in you," rather she said that she had never been interested in me, which is relevant to rehabilitating her pride, and is farcical. In any case,

neither the text of her note, nor its tone, implied that I shouldn't email her again. A week later I replied to her with a note that was brief and deferential, and she didn't respond to it. A week after that, I sent her the last note that discussed her harassment, which prompted her to contact SWIFT HR. That email was critical of her harassment, but even more importantly, it evinced the reason for her harassment. I.e., she was angry because I hadn't responded to her signals, and then she exploded with anger because she found my speaking voice attractive. That creates a perception that she likes me more than I like her, and that perception is extraordinarily intolerable to the women who have shown an interest in me. It accounts for a lot of abusive manipulation (example: Grace Hoang), as well as women quitting their jobs. Once Ms. Cho realized that I wasn't actually pursuing her, and that my only reason for emailing her was to discuss her harassment, she contacted SWIFT to create the impression that I was pursuing her, and that she wasn't interested in me.

If Ms. Cho provided the emails to SWIFT when she contacted them, and she omitted my last email which was the real reason she contacted them, then that would prove that she complained disingenuously.

After my last email to Ms. Cho, I was on vacation for about four weeks. When I returned, I saw that HR had sent me an email almost four weeks before, telling me that Ms. Cho had contacted them about the emails I sent. HR asked me to "cease all communication" with her. I responded with angry defiant emails to HR. The HR manager who sent me that note, Susan Ahalt, was the same one who had perpetrated an outrageously dishonest cover-up of what my former manager had done to me, to the point that she didn't leave any written record of her conclusions. As HR manager, Ms. Ahalt was responsible for the company culture of rampant sexual harassment, and that's the reason I was emailing Ms. Cho, and she was using that against me; she was also responsible for the predatory culture in which I had been singled out for harassment and discrimination by men, a prime example of which she had just covered up. And, HR had in the past had been complicit in other outrageous treatment I had received. And, HR didn't ask for my side of it, she just sent me a note which used the phrase "cease all communication," as if I were a criminal. And, it seemed to me that if a former employee could manipulate the HR manager to treat me in this way, then anybody in the world could contact SWIFT HR and manipulate them into addressing me as a criminal. For all these reasons, I sent angry, defiant emails to HR. In one of them I said that I reserved the right to email Ms. Cho again, which I wasn't planning to do, and didn't. SWIFT said that the reason for my termination was my actions in the past week, which is when I had sent the defiant emails to HR, but I would have been terminated even if I hadn't sent those emails. Note that my termination occurred the next business day after I was given the farcical conclusion of the Internal Audit investigation into my allegations against my former manager. That is described in the section "Sex Discrimination Lowered my Salary." Management knew I wouldn't accept Internal Audit's

cover-up of what my previous manager did. The head of Internal Audit had provoked me into sending him a hostile email before they began their investigation into my allegations, but they didn't use that email when they terminated me, because they made the termination about Elizabeth Cho.

In that last week, there was one other issue that SWIFT might cite as a reason for my termination, although it's unlikely. At my manager's request, I opened a support ticket. The technician who responded to that ticket, Marc Pletinckx, was a member either of Grace Hoang's team, or of a team closely related to her team. His response to the ticket was a continuation of the company's hostile reaction to my replies to Ms. Hoang on the message board, so I closed the ticket with the following comment:

I don't see any point in keeping this ticket open. Marc can't answer a simple question. I also don't understand his attitude regarding my clarification on re-using views.

SWIFT management might claim that this comment was unprofessional. In his response to my ticket, Mr. Pletinckx pretended that I said something that I didn't say, so that he could belittle me. His belittling comment would have been unprofessional even if it weren't based on a lie. That's why I closed the ticket with the above comment.

[Sexual Harassment and Threat of Physical Violence at Tech Day 2017](#)

SWIFT held an annual event for employees in Virginia, usually at an off-site location. The event is known as "Tech Day." At Tech Day 2017, I was so under siege with sexual harassment, and a threat of physical violence from a male co-worker, that I refused to attend Tech Day 2018.

Sexual Harassment at Tech Day

Early that day, dozens of SWIFT employees were crowded into the lobby of the Tech Day venue. Grace Hoang chose that environment for a flirtation. She looked at me playfully and provocatively, then abruptly spun around to show me her figure in her sexy outfit. Many people observed this, including Ryleigh Lee, a woman who had been upset in prior months that I didn't want to connect with her. Ms. Lee's reaction to observing Ms. Hoang's flirtation was to give me hostility, followed by severe, competitive sexual flaunting later that day. Ms. Lee continued to behave as if she were in competition with Ms. Hoang for a few months in the office. Eventually, the senior manager Dhiru Thaker observed Ms. Lee's inappropriate buttocks flaunting for my benefit, and his reaction was the following. He got my attention, and gave me an extreme, exaggerated look of accusation and disapproval, as if it were my fault. He didn't blame her, he blamed me. That shift of blame was gender-based, and it influenced me to try to

connect with Ms. Lee, to my detriment. It also caused me to worry about my raise and bonus for the following year.

The afternoon of Tech Day 2017, I was sitting in a large lecture hall with many other SWIFT employees. I found myself with women on all sides of me who were targeting me for harassment.

The row in front of me:

Grace Rotz had previously given me disrespect and hostility in the office, as described elsewhere, and her motive for that implies sex-based discrimination. On Tech Day, she was sitting in the row in front of me. Then, she traded seats with someone in order to be sitting directly in front of me. Then, she turned around and tried to force eye contact with me, because she had spent more time on her makeup that day, and she wanted me to see that. I refused to accept this, and I looked away angrily. Because of my reaction, she later maliciously lied about me to her colleague Miruna Ninov, which caused Ms. Ninov to give me hostility in the office. Ms. Rotz came clean to Ms. Ninov a few days later about her lies, and then Ms. Ninov apologized to me.

The row behind me:

There was a woman sitting in the row behind me, Adrienne Carroll, who had sexually harassed me as described elsewhere. On Tech Day, she gave me a look/signal, as if there were a romantic connection between us. I had been very upset by her harassment, and I couldn't tolerate her looks and signals. She had been delusional to think I ever had any romantic interest in her, simply because I was courteous when we worked together. Then, Ms. Lee walked over from her seat on the other side of the lecture hall, and stood ten feet from me, with her back to me. I realized immediately that her purpose was to give me a view of her buttocks, because she had earlier seen Ms. Hoang flirting with me provocatively. However, after a couple of minutes, she bent over at more than a 90 degree angle, with arched back and sexual body language, her buttocks pointed directly at me, in full view of many people. I felt under siege with sexually harassing women literally on all sides of me (and elsewhere in the room), so I made a statement to Ms. Carroll in the row behind me, as follows. I only wear my distance glasses while driving, but I took them out of my pocket and put them on, and looked directly at the buttocks of Ms. Lee, before she bent over, while she was just standing there. I did that just long enough for Ms. Carroll to get the message, which she did, because she moved to another location in the auditorium. Then, I noticed Ms. Lee's sexual pose when I was no longer wearing my glasses. I had two contradictory reactions to that pose; I laughed out loud, and I was deeply frustrated at the same time.

Threat of Physical Violence

Later that day, I was sitting in a chair next to a hallway in the Tech Day venue. A male co-worker, Jerry Kickenson, was sitting in a chair directly across the hallway from me, having a loud

telephone conversation, making some kind of arrangements for his father. There was a woman standing at a distance from us, and I wondered if I knew who she was, or if she was with SWIFT. I moved in my chair in a way that suggested to Mr. Kickenson that I was going to get up so that I could walk over to her, although that wasn't the case; I wasn't going to get up. Mr. Kickenson reacted to my movement in the chair with a very violent motion, as if pantomiming an assault, or throwing something at me; and, by looking at me with a very threatening expression, akin to a snarl, as if he were in the midst of combat. There was no reasonable way that I could respond to this threat of physical violence, and the stress of being forced to accept such degradation caused me psychological torment for months. If Mr. Kickenson observed, as many people did, Ms. Hoang's behavior earlier that day, then that would explain his behavior. If he observed, as many people did, Ms. Lee giving me a severe sexual pose, that would also explain his behavior.

Sexual Harassment by Others

Tia Neal

2017 – Bad-mouthed me to a manager because I didn't try to date her

Overview

In late 2017, Ms. Neal gave me an obvious signal that she wanted me to approach her in a personal way, or "get her number." In order to avoid awkwardness in the office, I responded to her signal by sending her a work-related email, as a means of acknowledging her. She replied, saying she was working from home that day, and so she would bring me a lens cover for my laptop the next day. However, I didn't hear from her the next day. Weeks later, my health improved, I started exercising, my appearance changed, and then Ms. Neal became upset that I hadn't tried to date her. As a result, she gave me a disturbingly hostile glare in the cafeteria, and worse, she bad-mouthed me to a manager. This manager had an obvious reaction to whatever Ms. Neal told him about me; it made him view me as an enemy. This same manager had supported his subordinate's unprofessional humiliation and degradation of me in the past, and I was going to have to work with him and his team again, so I was in a worse position now that Ms. Neal had bad-mouthed me to him. All I had done, with respect to Ms. Neal, was try to avoid awkwardness in the office by acknowledging her obvious signal with a work-related email. The paragraphs below provide details of these events.

Detail

In late 2017, Ms. Neal gave me a very blatant signal that she wanted me to approach her, and since I thought it would be uncomfortable or awkward if I ignored her, I acknowledged her by sending her an email about a work-related matter. I.e., I asked her if she had a lens cover that I could use for my laptop camera. She replied the same day, and said that she was working from home that day, but the next day she would bring me a lens cover for my laptop, which is what I requested.

Soon after that, later that day or the next day, the manager Jeff White walked past the area where I was working, and grinned at me as if trying to communicate something. I thought he

must be referencing the fact that his software testing team was about to qualify a software release that I was making. Because, when his team qualified a release of the same software a couple of years before, he and one of his team members had unprofessionally humiliated and degraded me in an email thread that copied managers and staff across different departments, in a way that no other employee would have been subjected to. At that time, I was in a condition where I was very attractive to women, and I'm sure his team member's motivation was resentment of that, and they were both enabled because my medical problems caused me to project a defenseless personality. After my email exchange with Ms. Neal, I thought Mr. White's grin meant that they were going to do the same kinds of things to me when they got the new release; i.e. I thought he was threatening me. I was so upset that I left the office and drove around for about thirty minutes. After that, it occurred to me that the explanation for his grin was probably different. I didn't know that Ms. Neal and Mr. White were friendly, but since there were very few African-Americans in the office, maybe they were. And, Ms. Neal must have told Mr. White about me, and he was grinning at me for that reason. Later, it was confirmed to me that Ms. Neal had in fact talked to him about me, as described below.

I didn't hear from Ms. Neal after her reply to my email. She never brought the lens cover. However, a few weeks later, my health improved, I started exercising, and I looked noticeably different. Ms. Neal reacted to that as follows. First, she gave me a disturbingly hostile glare in the cafeteria. Then, when I saw Mr. White in the hallway, he reacted to me as if we were enemies; this was obvious from his expression, his body language, and the way he moved away from me as he walked past. So Ms. Neal didn't just give me a disturbingly hostile look, she had bad-mouthed me to Mr. White. Mr. White was a manager with whom I had to work, and who had supported his subordinate's unprofessional mistreatment of me in the past. So Ms. Neal bad-mouthing me to him, had put me in an even worse position for having to work with his team. This left no doubt that Mr. White's grinning at me weeks before, was due to what he had been told about me by Ms. Neal.

I responded to this by replying to Ms. Neal's email in which she said she would bring me a camera lens cover. I said I understood that she probably just forgot. I was implying that her hostility didn't make sense, because she had ignored me weeks before. After that, when I saw her in the office, she made an effort to react to me with humility, and I didn't receive any more hostility from her. However, I don't know if she corrected her bad-mouthing of me to Mr. White.

2019 – Inappropriate Behavior Angered the Executive for IT

Ms. Neal's behavior incurred anger in the executive for IT, Craig Young, and gave him added incentive to punish me, which he did by covering up the dishonest and malicious lowering of my raise and bonus by Shirish Lawate. He had been aware of me, and viewed me with hostility, ever since my replies to Grace Hoang on the message board. The incident described here would have made him feel much more hostility toward me.

In the cafeteria, Ms. Neal did something very conspicuous and transparent, to get my attention, so that I would see her as she stepped to the coffee machine, and then observe her rear view while she stood there. Unfortunately, Mr. Young was one of the people in the cafeteria who observed this. He was standing a few feet to her left. Ms. Neal then strangely said “Hi Craig” without turning her head. Mr. Young then turned his head and looked at her, with an angry expression, and he didn’t say anything. He was obviously angry that she was so blatantly showing off her figure to me.

Other Information

This section is included for completeness. It describes incidents in 2019 and possibly late 2018.

One day, Ms. Neal did something repeatedly. Every time she walked past my workstation, just after she walked past, she lifted the back of her sweater to show off her figure to me. She had no pretext for doing that. The next day, she was working in a different office wing than she usually did, presumably because I hadn’t said anything to her about the show she had put on for me the day before. When I saw her in the other office wing, I pretended to look for a workstation to use near her. I meant that as an acknowledgement, so she would feel comfortable returning to her usual office wing, and also because I was hoping that I could eventually have a conversation with her and surreptitiously record it, in which she would admit that she had bad-mouthed me to Mr. White because I didn’t try to date her. Soon after that, probably the next day, she was back in her usual office wing, and I was there too. As I was leaving for the day, she shouted “Good night Paul.” Paul Manning was sitting near her, and he disrupted her attempt to talk to me. But she ran after me, and we spoke briefly until I indicated I was angry about Mr. Manning, without saying why. Mr. Manning had previously refused to work with me properly, because of my message board posts replying to Grace Hoang. On that day he had obviously been trying to belittle me or disrespect me to Ms. Neal.

There was another day in 2019 when I approached Ms. Neal while she was working, and said hello. I did that because shortly before that, she had looked at me in a way that made me worry that she would become angry if I didn’t acknowledge or speak to her. There was a precedent for that. Also, I was hoping I could eventually have a conversation with her, that I could surreptitiously record, in which she would admit that she bad-mouthed me to Mr. White because I didn’t try to date her.

Yin Xu

Beginning in 2015.

Ms. Xu’s cubicle was in front of mine. One day, when I walked past her to get to my desk, she pivoted 180 degrees to look up at my face, and “check me out” in a way that a man couldn’t get away with. Later that day, or the next day, I stood up from my chair, and I became frightened when I observed Ms. Xu. She had positioned herself in a sexual pose, and when I saw it, I quickly left the area. She was kneeling with both knees on her chair, leaning over the back of

her chair, and typing. So, when I stood up from my chair, her buttocks were in the air in front of me, and her whole body was in a sexual pose.

Months later, she came to the office with a conspicuously prepared look, with her clothes, hair, makeup, earrings, etc. As I walked past her cubicle, she looked at me suddenly with an openly inviting look, as if she expected me to immediately ask her out. I sat at my desk and thought about how I might deal with this, but ultimately did nothing. The next day, she stood in her cubicle and gave me a vicious angry head gesture, because I hadn't responded to what she did the day before.

In order to smooth things over with her, I sent her an email with a link to a Youtube video about a subject I had overheard her express interest in, i.e. soybeans. She thanked me for the link. Over the following weeks, she flirted with me in other ways, that were less overtly sexual. I had hoped she would accept my email as a peace offering, I didn't want her to flirt with me. I was upset and frustrated by her flirting, so I tried to find another cubicle I could move to, but there weren't any good options. I was quite upset about this for a while. Then, one morning I paused at the doorway to the break room when I saw her there, and gave her an angry look. After that, I saw that she was upset with me, so I texted her and asked for her personal email address, hoping we could smooth things over by email. She gave me her email address reluctantly, because she was still angry with me. I emailed her to tell her that I hadn't thought she would mind if I asked for her email address, but I wouldn't email her again. Later, she seemed quite upset by that; she appeared to regret being angry with me. I emailed her after a while, and sent her a brief friendly note.

At some point she did the following, I'm not sure when. When she saw me walking in the corridor, she broke into a sprint to reach me, and then matched my walking speed and positioned herself a couple of steps in front of me. Her purpose was obviously to show off her buttocks to me. That was problematic because others could have seen it, and because it created anxiety/distraction/frustration for me.

Near the end of the roughly two-year period that we were cubicle neighbors, and a while after the allegations against her in the complaint had already occurred, I sent her the following email:

Hi Yin,

I tried to catch you in the break room and the cafeteria today for a chat, but it didn't work. I was hoping to say hello, and also tell you that you looked fantastic today. Talk to you later

Thanks,
Paul

It was the only time I ever responded to her in this way, despite everything she subjected me to off and on for two years as a captive audience (cubicle neighbor).

She responded to this email in the following way. The next day, as she was standing in her cubicle, she told someone that she was leaving for the day, so that I could hear her. She was obviously hoping I would try again to catch her as she was leaving. I didn't.

The day before, I had made a somewhat half-hearted attempt to catch her in the break room, but I knew nothing would come of it. I don't specifically remember what flirting or showing off she was doing at that particular time to influence me to do that.

The following happened in 2017, months after we were no longer cubicle neighbors. I went into the cafeteria outside of lunchtime, and sat at my usual spot. I noticed that Ms. Xu was sitting about twenty or thirty feet from me, facing me, wearing a short skirt. I saw no reason not to sit where I normally would, and I didn't look at her while I was there. Shortly after that, in a work area, she made eye contact with me for an extended period of time as I walked past her, but I didn't talk to her as she obviously wanted me to do. After that, she became visibly upset every time she saw me in the office. I felt she had painted herself into a corner with her sexual harassment, so I dealt with the situation by sending her an email to her personal email address, asking if she wanted to have lunch with me. She didn't reply, but the email had its intended effect. Her attitude toward me in the office changed 180 degrees. She looked at me in a very friendly way when we passed in the hall. Later, when my physical condition improved, I observed that she noticed it, and then she tried to get me to approach her, but I didn't.

There were multiple times when she saw me in the office, and openly studied my face as if deciding whether she thought I was attractive, and ignored the fact that I could see her doing that just a few feet from me. We weren't having a conversation; she would do that while one of us walked past the other. I can remember being angry about it at least once.

[Adrienne Carroll](#)

I worked with Ms. Carroll when she was a software tester for a product for which I was a developer. After we had worked together a while, she put on a show for me to show me she was pretty. She spent time in the office wing where I was working, and she gave me looks and poses. I didn't say anything to her about it, so after that, she refused to work with me properly. For the first time, she ignored my requests for work-related information. Instead of becoming angry at her unprofessional behavior, I offered an olive branch, by messaging her "have a good weekend" at the end of the day on Friday. On Monday, she responded positively to my text, and provided the information I requested. I thought the problem was solved. Then, she manifested a predatory behavior pattern, because she hadn't yet punished me enough for not saying anything to her about the show she had put on for me. Shortly after that, we were both present in a meeting. She was very conciliatory and friendly toward me in the meeting. She asked me an unnecessary question as we were leaving the conference room, just so we would be speaking at close quarters face-to-face, and I would see she had spent more time on her appearance that day. My reaction to the meeting was that I was very heartened that a woman at SWIFT was taking the high road, i.e. she was willing to let go the fact that I didn't say

anything to her about the earlier show she had put on (although she had already been unprofessional in multiple ways). Shortly after the meeting, I sent her a work-related email, that normally I would have addressed to about three people, but this one I only addressed to her, because of my reaction to the meeting. She pointedly ignored that email. It was obvious that she had gone to a lot of trouble to set me up for that snub, as further punishment. After that, when she gave me a couple of looks and signals, as if we had a romantic connection, I couldn't tolerate it, and that led to the issue at Tech Day. At some point after Tech Day, I sensed her standing next to me while I was using the coffee machine in the cafeteria. Because of what happened at Tech Day, I turned and looked at her harshly, as if I were ready to defend myself in case of a confrontation. She just stood there and smiled up at me, ignoring my harshness. I interpreted this as Ms. Carroll accepting that my rebuke at Tech Day was a reasonable response to everything she had done. In the summer or early fall of 2018, she started to play games with me in the hallway, doing things to get me to notice her, or sticking her head in the break room when I was there. I didn't respond, and eventually she seemed hurt by that. So I texted her to ask her if she was still working on the same things, as a way of acknowledging her. She told me that she had transferred to a different job.

Tami Moore

There was a problem with the work environment in SWIFT that was caused by inappropriate behavior. Frequently, women would pose for me, and it usually involved showing off their rear view. Occasionally, they would take advantage of the fact that they were protected by the office environment, and they would do things that they wouldn't do elsewhere, because they wouldn't know what the man might do in those other environments. It's difficult to describe the effect that this had on me, except to say that I often felt like my head was going to explode, and it created an impossible work environment. It was very frustrating, exasperating, and demeaning. I was supposed to be a professional working in a professional environment.

I couldn't remember or list all of the women who did this. I rebuked a few of them for this behavior, using nonverbal communication, and most of them got the message. I'll describe the actions of one woman, Tami Moore, because she was a senior manager who reported to the executive for IT, and she had spent time as a senior manager in HR. The fact that she was doing these things openly in the office, makes a powerful statement about the company.

1. Mid-2018 - Ms. Moore was standing and talking with someone in the cafeteria, in profile to where I was sitting. While she was talking, she bent over 90 degrees, as some sort of affectation in the conversation she was having, but I could tell it was for my benefit. It was confirmed later that day that she had done that for me, when we passed each other in the office work area. Because, as soon as she saw me, she adopted a pose of exaggerated embarrassment, and had fun with it as she walked past.
2. Late 2018 - I was in a meeting in a conference room, and the room had glass walls. I was looking at my laptop, and Ms. Moore walked straight toward the glass, to get me to look up at her. As soon as I looked up, she pivoted, and walked back a short way to a

standing desk. As she pivoted, she gave me a provocative look over her shoulder. Then she stood with her back to me at the standing desk, in a tight skirt. I couldn't work for about an hour after that, I was aroused and frustrated. She had done that in full view of others.

3. Late 2018 - Ms. Moore walked in front of me in the hallway, and she looked back at me as she walked, as if we were romantically or sexually involved, and she was obviously encouraging me to look at her buttocks. It was frustrating.

In 2018, when flu shots were given in the office, I got into the line for flu shots behind Ms. Moore. This was a coincidence; I wasn't trying to be close to her. I later wondered if she interpreted this as encouragement for some of her later inappropriate behavior.

Another issue is the following. I had to deal with these kinds of issues with other women as well, that were related to their sexual flaunting. I was subjected to a hostile attitude from Ms. Moore after Thanksgiving weekend, because she had noticeably gained weight, and she was angry that I saw her in that condition. She walked a long way toward where I was sitting in the cafeteria to bus her tray, and had an angry and defiant demeanor for the whole walk. I was sitting near the area where trays were returned, and nobody else was in the cafeteria.

Laila Shaikh

In 2018, I became aware of Ms. Shaikh when she got my attention and blatantly posed for me, as if enticing me. Within a few days or weeks of that, she started to work at a workstation next to where I worked most days. During the time that she worked next to me, the following occurred.

1. I had to turn and look at her scoldingly, because she had been staring at me inappropriately. She looked away, but I didn't look away immediately, because I was angry that she had been doing this repeatedly. So, she moved her head closer to her monitor by craning her neck, as if to say "I'm looking at my monitor, I'm not looking at you anymore."
2. She spent some time at the other end of the row of workstations, and saw me from the other side. Then, she spent more time there, without her laptop, and with nobody to talk to, blatantly looking at me. After she returned to her workstation, she looked at me one more time, but with very different body language. She now seemed upset and disappointed, because she hadn't known that I had a bad side, and she wanted nothing to do with me after seeing me from the other side. I was angry that I had to tolerate her blatantly staring at me, and then manifesting this degrading body language toward me. I looked at her out of anger and disbelief that I had to tolerate this, and she must have sensed I was looking at her, because she made a repeated violent motion with her foot as if to ward me off.
3. She changed her mind about me again, after she overheard me speaking in a meeting near the workstations. Because, after that, she tried to entice me again. As I walked

past her workstation, she communicated vigorously, and non-verbally, that she wanted to connect with me.

4. This period of Ms. Shaikh working near me ended after a relatively short time, when that section of the office was reserved for another team.

About a year later, in 2019, Ms. Shaikh tried again to connect with me. She blatantly showed off her buttocks to me, by standing near me with her back to me, and looking through the glass wall of an empty conference room, for much longer than it would have taken to realize there's nothing in the room to look at. Then, she turned around and looked at me very directly for a few seconds, or for several seconds, as if she were saying "my buttocks look good, don't they? we should get together."

Grace Rotz

In 2017, I walked into an employee lounge, and Ms. Rotz was the only person in the room. As I came through the door, she reacted by spinning in her chair. She ended up facing the wall, like a child who is being punished. I interpreted this as hostility and disrespect, which I didn't understand. I had previously noticed Ms. Rotz looking at me differently, as if she were becoming attracted to me. It was later confirmed by events at Tech Day, that that was the case. So her reaction to me in the employee lounge must have been caused by her insecurities at being seen by a man she found attractive. But I didn't think of that at the time. She had a colleague, Miruna Ninov, who had flirted with me in the past. So, I thought that Ms. Ninov might be angry with me for some reason, and possibly Ms. Rotz was supporting her colleague's anger. So I sent Ms. Ninov an email on a work-related topic, to see how she would respond. She responded professionally, but then she had a strangely aloof reaction to seeing me when we walked past each other, which upset me. Then, after what happened at Tech Day, Ms. Rotz maliciously lied to Ms. Ninov about me, which caused Ms. Ninov to give me hostility in the office. After a few days, Ms. Rotz came clean to Ms. Ninov, and then Ms. Ninov apologized to me.

Ryleigh Lee

In 2016, Ryleigh Lee and I had assigned cubicles that were relatively close to each other. She exploited the fact that I was a captive audience, by repeatedly giving me signals over a period of months, that she wanted me to approach her. I ignored her for months. I remember three blatant signals in that period, and I perceived at least one subtle signal, probably more. Her behavior was the equivalent of a man repeatedly asking a woman for a date in the office, and she tells him no repeatedly. That is defined as sexual harassment, and that's no different than what Ms. Lee did. And, if she hadn't done that, I wouldn't have had repeated disturbing problems with her over the next few years.

I finally responded to Ms. Lee's signals, and we texted on our phones for a couple of months, and had a few phone calls. She ended our texting relationship after I didn't take her up on her two invitations to have dinner or a meal, because I felt my health problems precluded it,

and I told her my health was getting worse instead of better as she had thought. (She gave me the dinner invitations in the texting thread from our phones, but in our initial phone call I asked her out. She said yes but we never went because of me.)

Then, we had an argument during a telephone conversation when she misrepresented the nature of our interactions, i.e. she said her intent was only to connect with me platonically and briefly. I pointed out that I only approached her in the first place because she gave me signals for months, and I had ignored her, but she wouldn't let it go. She was very angry about that.

The only time that Ms. Lee and I went out, is when we went out to lunch from the office. This occurred because, during a phone call, I told her that my health was getting worse instead of better as she had thought, so she responded by setting up this lunch as a way of terminating our texting relationship.

Over the next couple of years, there were periods of time when Ms. Lee was trying to connect with me in the office, and this included multiple incidents of disturbing and unacceptable behavior. We had no personal relationship of any kind during these periods, although in late 2017 the senior manager Dhiru Thaker influenced me to try to connect with Ms. Lee. Mr. Thaker blamed me for Ms. Lee's flaunting of her buttocks for my benefit, which she was doing as part of her perceived competition with Grace Hoang. Mr. Thaker was the senior manager of the organization I was in, and I wondered if my raise and bonus would be affected by that, and I was influenced to try to connect with Ms. Lee. I abandoned that attempt after she punished me for not saying anything to her about her sexual flaunting. The first time that I didn't say anything, she refused to communicate with me. Then, after she resumed sexual flaunting a short time later, and I didn't say anything, she maliciously manipulated me. That was very upsetting, and wouldn't have happened without the influence of Dhiru Thaker.

In early 2017, Ms. Lee was angry that I wasn't interested in her, so she did the following. She stole a headset from her colleague Lata Rawat. The headset was emblazoned with the name "RYLEIGH" in large decorative letters. Ms. Lee had previously given the headset to Ms. Rawat. One afternoon, when I stepped away from my laptop, Ms. Lee disconnected the headset from my laptop, and connected the one that she had stolen from Ms. Rawat. Shortly after I returned, I got up to leave for the day. Ms. Lee was standing in the corridor, and talking with someone. When I entered the corridor, she took a step backwards as she spoke, to block my path. She created the impression that it was a volatile situation. I took the long way around to avoid her.

I was a little frightened after a phone call, when I took off the headset, and noticed the ornamental lettering RYLEIGH. It made me think of the movie Fatal Attraction, although Ms. Lee and I never had a physical relationship of any kind. I asked Ms. Lee about the headset, and she told me to contact Lata Rawat. I spoke with Ms. Rawat when I returned the headset,

and she said it had recently disappeared from its storage location, and she didn't know what had happened to it.

A few months later, at Tech Day 2017, Ms. Lee discovered that Grace Hoang was pursuing me, when she observed Ms. Hoang's provocative flirtation. Ms. Lee's reaction that day was disturbing, and could have been the reason for the threat of physical violence that I received later that day from Jerry Kickenson. These issues are described in the section "Sexual Harassment at Tech Day 2017, and Threat of Physical Violence."

Over the next few months, it caused me added anxiety to know that Ms. Lee's sense of competition with Ms. Hoang was the reason she was periodically trying to get my attention.

Her reaction to my replies to Ms. Hoang on the message board made it obvious she thought they signified that I had chosen her over Ms. Hoang. The day after I posted my second reply, she looked up at me like I had proposed marriage to her, when she saw me in the break room. (After my first reply, she wore short shorts to the office, and I think that's the only time I saw a woman wear shorts as office attire in SWIFT.) When she realized I hadn't chosen her over Ms. Hoang, she renewed her sexual flaunting, and that's when Dhuru Thaker observed it and blamed me.

In the documents I submitted to the EEOC, I said I didn't want to accuse Ryleigh Lee of harassment. But what she did is harassment.

This paragraph is included for completeness. In late 2016 or early 2017, Ms. Lee was angry because I observed her running to get to a location where I would see her in an attractive, sexy outfit. She had miscalculated, so I saw her before she intended, and that created a perception of desperation on her part. Her pride was injured, and she was angry. The following week, she had an angry reaction to seeing me. Although we no longer had a texting relationship, I tried to smooth things over by sending her a work-related email that she would know was actually an acknowledgement. She gave the impression that she accepted the acknowledgement, and the issue was over. Then, she came to the office wearing clothes that had coded meaning for us, and it was the only other time she ever wore those clothes to the office, except the first time that created the coded meaning. I didn't want another incident where she was angry that I didn't reach out to her, so I texted her on her phone for the first time in a long time, and simply said "Hi, is this Ryleigh?" She ignored that text, and I realized that her purpose in wearing those clothes, which manipulated me into texting her, was to enable her to snub me, i.e. to rehabilitate her pride. Roughly a year later, after Dhuru Thaker had influenced me to try to connect with her, she perpetrated a similar manipulation, and I fell for it again because she did it in a very different way. In that instance, I texted her at work using our PC texting, and she replied maliciously. As I mentioned, that was very upsetting.

I have the texting thread from our phones. I have a hardcopy printout, and I have a digital copy that I can't currently access. It's in iMessage on an iMac that I'm not able to log into

because I forgot the password, and the password recovery procedure didn't work. An Apple tech might be able to help.

Sexual Harassment not reported to the EEOC

There were incidents of sexual harassment that I didn't report to the EEOC for the reasons stated below.

Jenny Han - Unwanted Sexual Touching

I didn't submit the following incident to the EEOC, because it occurred approximately fifteen years ago, before sexual harassment had become an entrenched problem for me. I was standing in a hallway talking with someone, and I felt something press hard into my arm. I turned and saw Jenny Han walking past me, and she was awkwardly rotating her torso, so that she could rub her breasts against my arm as she walked past. It was obviously deliberate; it was a game. And, there was nobody else near her, and there was plenty of room in the corridor. I think she wanted me to know that her breasts felt massive. Prior to that, I had never noticed Ms. Han's chest. A minute later, she came walking toward me from the other direction, and said "hi Paul" in a very exaggerated, playful way, but I didn't say anything to her. All of this made me uncomfortable, was disorienting, and might have been seen by others.

At that time, my wife and I hadn't yet separated, although I didn't wear a wedding band. And, my wife wouldn't have appreciated a woman deliberately rubbing her breasts against me. Lack of a wedding band doesn't justify that.

Women whose Husbands worked in the building

I was sexually harassed by two women whose husbands worked in the same building, Sheetal Rawat and Lisa Fortunato. The harassment by these two women was not as severe, so I didn't submit it to the EEOC. However, the fact that their husbands worked in the same building, caused added stress. I describe it here for that reason.

Sheetal Rawat

2017 or 2018

1. She gave me an inappropriate, provocative smile.
2. She stood still for an extended period of time, while looking at her phone, for the purpose of showing herself off to me in a tight skirt.
3. When she was walking in front of me in the hallway, she spun around and gave me a wild look of anger as she walked past in the other direction, obviously angry that I hadn't said anything to her about her showing herself off to me as described in #2. That is particularly bizarre considering her husband worked in the same building.

2019

1. She paraded back and forth in front of me, while smiling at me, as if she were competing in a beauty pageant, and I were a judge. That was uncomfortable and frustrating for me.

Lisa Fortunato

2018 or 2019

When we were walking in from the parking lot, Ms. Fortunato wanted to open one gate and two doors for me, because my hands were full. I thanked her the first two times, but I opened the last door myself, because it was the most natural thing to do. However, as I was opening the last door, I was very uncomfortable, because I knew that Ms. Fortunato would be angry, because she was obviously attracted to me. Later, I sent her an email requesting support, and she ignored it, for the first time in many years of working together. The next time I requested support from her, she provided it, but she criticized my request in a way that didn't make sense, and was out of character for her.

Company Reaction to Message Board Posts

Grace Hoang abused an electronic message board that was visible to almost everyone who worked at SWIFT in Virginia. She abused this board for purposes of manipulating me, as a complement to her other harassment. This section describes how her abuse of the message board ultimately led the entire company to essentially go to war with me. My work environment became surreal; it felt like going into a war zone every day. That continued until the time I was terminated. It was completely unsustainable from the point of view of my daily life, and the effects on my health. The only reason that I became able to document these issues, is that I started receiving acupuncture treatments in Sept. 2018 to alleviate the effects of stress.

Twice, Ms. Hoang posted "throwaway" comments on this message board, so that I would be forced to see her photo every day as I went about my daily work. After her other harassment became intolerable, I replied to one of her comments on the board, to let her know that I would no longer tolerate her abuse of the message board to manipulate me. My replies should not have been interpreted by anyone other than Ms. Hoang as having any coded meaning, or as being inappropriate in any way. However, I faced an onslaught from the men in the company, but not the women. My days in the company were numbered once Ms. Hoang decided to use that message board to manipulate me.

In September 2017, Ms. Hoang posted a comment on the board while I was on a long vacation, so I would be forced to see her face and name as I returned to work. She mentioned my vacation in her last email to me, which proves she was aware of it. My vacation ended on Friday October 6, and the next day I saw her comment, and the several replies to it. She was also thinking that I might see her comment during my vacation; she posted her comment almost a month after she framed me for rape, and we hadn't seen each other since then, because she had been at a conference for a week, then my vacation started.

Her comment requested that whiteboards be installed in the conference rooms in the remodeled office wings, although that is something that would have been considered from the beginning of the planning of the remodeling, and some of the conference rooms may have already had whiteboards. The timing of her post, combined with its content, as well as her post earlier in the year which I believe had the same purpose, convinced me beyond any doubt of her real reason for posting it. For reasons described earlier, I could no longer tolerate her unprofessional abuse of a company message board so that I would be forced to see her photo every day. So, I replied to her comment in a way that should only have had coded meaning for her. My replies were useful, professional, intelligent, and in no way a personal slight of Ms. Hoang. The depth of the reaction to my replies was profound and pathological.

The magnitude and irrationality of the reaction to my replies by men, can be explained by their attraction to Ms. Hoang, their longstanding resentment that I was attractive to women, and the perception that I was rejecting her. Another factor is that they wouldn't have been capable of writing my replies themselves if they had wanted to. Many of the men were honoring a narrative that my replies to Ms. Hoang were misogynistic, and therefore their hostility toward me was virtuous. Over a year later, when two of these men found out that I had transferred to a team with a female manager, they communicated conciliatory nonverbal messages that I was no longer a misogynist in their eyes. However, it's obvious that the real reason for their change in attitude was that my health and physical condition had worsened, and as a result, women were no longer responding to me as they had been, and I was no longer at all physically imposing. Note that it's preposterous to characterize my replies on the message board as misogynistic, for the following reasons.

- My replies were useful, professional, intelligent, and in no way a personal slight of Ms. Hoang.
- I sensed a positive reaction to my replies from the women in the office. So, the men would claim that every woman in SWIFT is an Uncle Tom about gender, and is in dire need of a man to tell her when a woman has been slighted.
- My replies addressed the issue of security, which hadn't been addressed in any of the replies to that point. Senior management, and the executive, had repeatedly emphasized that security was the paramount issue in SWIFT, following the incident in the Bank of Bangladesh, so it was important that somebody bring out the security implications.

I still carry this accusation of misogyny around with me twenty-four hours a day, because it's the opposite of what I am, and I feel it has destroyed my identity.

I could have gone further than I did in my replies, in a way that would have been of benefit to the company. I could have said if a manager like Grace doesn't realize that for the same reason we lock our laptops when we step away from them, we shouldn't reflexively ask for whiteboard walls in the conference rooms, then we haven't achieved the required paradigmatic change in thinking about the level of security that's inherent in our environment.

Note there was one woman in the office whose reaction to my replies was the opposite of all other women, and she went to war with me. However, her provocative sexual posing for me in the office months later, after she had lost weight, illustrate that there was a different reason for her negative reaction to my posts, as compared to the men. This is described later.

Below are described some of the incidents that followed my replies to Ms. Hoang on the message board, which included many forms of harassment, discrimination, and intimidation or threats of physical violence.

[Humiliation and Degradation from my Manager and his Manager](#)

There was a formal combined team meeting that occurred a few times a year. It was a combined meeting of two software development teams. I was subjected to humiliation and degradation in one of these meetings, and that ultimately forced me to transfer to a different team. In the meeting, the only woman in the room asked a question, and I answered it after Giri Krishnapillai failed to provide a good answer. Because I spoke up in answer to this young woman's question, I was targeted by Mr. Krishnapillai, and especially by Shirish Lawate, for humiliation and degradation. This woman, Alyssa Berman, was my teammate at the time, and she transferred out of that team shortly after I did. When she was interviewed by Internal Audit, it's likely that she concurred with my interpretation of the incident, and it's also likely that she said her reason for transferring out of Mr. Lawate's team was that she couldn't condone or tolerate the outrageous way I had been treated by management. After the meeting, Mr. Krishnapillai tried to placate me by reversing himself on his decision that my training objective should be fulfilled by the use of the company's internal training web site, as opposed to spending money on training, as is done for every other employee.

Of course, such a bizarre reaction to me answering a question that was asked by a woman, wouldn't have happened prior to my replies to Ms. Hoang on the message board.

Mr. Lawate had been Ms. Berman's manager when she worked at SWIFT as a college intern, and also since she joined the company after graduation, until she left his team shortly after I did.

[Vendetta by Project Manager](#)

Prashanthi Devarapalli is the only woman in the company who had a negative reaction to my replies to Ms. Hoang on the message board. She discriminated against me by lying to senior management about my work, and disrespecting me in meetings and in email threads. However, after the conclusion of our extended conflict, her hostile reaction to my replies to Ms. Hoang on the message board was shown to have a different motive than the men who reacted with hostility. Months later, after she had noticeably lost weight, she did a provocative sexual pose for me in the office.

Ms. Devarapalli was responsible for coordinating the qualification of software that I had released, and she consistently tried to punish me in every way she could.

1. My manager was copied on an email in which she lied to senior management about the software I had released. She asserted that multiple problems had been found in the release, which was delaying the qualification. My manager told me that he admonished her against providing such misinformation to senior management. In reality the qualification was delayed for reasons that were unrelated to the software release, i.e. the state of the test environment was unknown and corrupted, the testers were new to the product, etc.
2. In a meeting, she lied to a development manager, and told him that there were problems and delays in the qualification that were caused by procedures I had documented that were not “straightforward”. However, the procedures hadn’t changed at all since the previous release a few years before, and in this qualification there were no issues at all that were caused by the procedures. She energetically interjected this lie as the meeting was ending, and it was conspicuously malicious.
3. There was an initial meeting before the qualification started, attended by staff from the development and test teams. My manager was late joining the conference call, and she was pleased when he called in, saying “I was afraid I was going to have to talk to Paul.”
4. She made progress more difficult by forwarding questions to others when they should have been directed to me.
5. In a meeting where we were discussing a problem with the test environment, she was dismissive of my comments, which forced me to assume a more assertive, but not hostile, tone. A tester then responded by yelling at me in an openly hostile, loud, and irrational way. I immediately and succinctly pointed out the irrationality of his point, and he was forced to accept it. This man’s reaction to me was obviously based on my replies to Ms. Hoang on the message board.
6. The qualification was put on hold when Ms. Devarapalli went on maternity leave. At around the time that she returned from leave, the qualification resumed with a different project manager. At that time, I sent an email to her replacement, and others, that summarized the state of the qualification. Because my note exposed Ms. Devarapalli's lies to management, both she and the primary tester on the qualification had a reaction to it.
7. Ms. Devarapalli had two reactions to my note:
 1. Shortly after I sent it, she caught my eye, and stood there giving me a prolonged hostile look, the “evil eye”.
 2. A few months later, in December, she had a very different reaction. As she was getting up from her desk, she saw that I was walking towards her. She appeared to suddenly start thinking quickly, with urgency, and quickly found a way to position herself so that she could slowly pick something up off the floor, or slowly put something down, but then freeze in a sexual pose in mid-gesture, for several seconds, in a provocative way, that blatantly showed off her figure to me. I noticed that she had lost weight and was in better shape than she had been in a long time, since long before she was pregnant. Similarly to how the real motive for the harassment I received from men is not my alleged misogyny, the real motive for Ms. Devarapalli’s abuse was her attraction to me. Note that her behavior also caused me distraction and frustration.

8. The primary tester involved in the qualification, not the tester mentioned in a previous item, also had a reaction to the note I sent which exposed Ms. Devarapalli's lies. This was because management was now aware that the delays in the qualification were not caused by issues with my release, rather they were due to the testers' inexperience, and issues with the test environment. So this tester began to behave unprofessionally towards me.

Twice, she failed to do things that she had agreed to do. She failed to contact me so I could be present when she performed a procedure with which she had little experience, which would have reduced the risk of further problems. And, she failed to perform an additional procedure that would have reduced the risk of more problems. That last procedure she performed later when I asked, but was of less value because it was done later. She also gave me obviously unfriendly attitude for about a week, as if I were wrong to expose Ms. Devarapalli's lies. Telling the truth shouldn't have put her in a bad position, because it wouldn't be unexpected for a qualification to be delayed if the testers had no experience with the product, and it hadn't been tested in years.

Intimidation and Thinly Veiled Threats of Physical Violence

Conference Room Incident

A man who worked at SWIFT who I'm not familiar with, whose name I don't know, did the following. I went into a conference room prior to a meeting I had organized, to prepare for the meeting. This man was sitting at a workstation just outside the room, near the door. I left the conference room briefly, and as I was returning, when he saw me coming, he got up and stood in front of the door, blocking it, pretending to study the console with the meeting information. Then, just as I reached him, he sat back down, without turning or looking at me. This man whom I didn't know, obviously knew me from my replies to Ms. Hoang on the message board. His actions obviously constitute some kind of threat or attempt at intimidation. The company could identify him from the following description:

- White
- Full beard
- Looked in his fifties in 2018
- Average to below average height

Parking Lot Incident

When I was driving in the parking lot, a project manager Andy Giller was walking past my car, and he looked directly at me through my windshield in a threatening, disturbing way.

Hostile Neighbors

After my replies to Ms. Hoang on the message board, very often I would find myself sitting and working near someone who I wasn't familiar with, and I would hear him having hostile reactions to me. For example, making angry sounds when he heard me speaking on the phone. This occurred on a regular basis, and frayed my nerves.

Indirect Threat

There was a bizarre incident which I interpret as an indirect threat, or statement of intimidation. A man who looked like he was in his sixties walked over to where a very young woman was sitting next to me, put his face close to hers, and said something in a low voice but in a very affected and animated way, and then left the room. It seemed very inappropriate and almost shocking. My impression is that this was a one-time incident, because she didn't seem bothered by what he did. He was actually making a hostile statement to me. Because, this attractive young woman had sat down at the workstation next to me, in a room with many vacant workstations. In any case, the older man couldn't tolerate the situation without making an obvious statement to me, which I found disturbing.

Being Disrespected and Called out by Managers

There is a manager, Paul Hayden, who had worked for years in the same department as Ms. Hoang. After my replies to her on the message board, he did the following. When I was sitting on a bench in a crowded break room, he walked right up to me where I was sitting, so that I would look up at him, then he immediately made an extreme expression of contempt and hatred. Because this was a crowded break room, and he was a manager, I had no option of making any kind of reasonable response. If I had started yelling at him, I probably would have been fired. Having to accept this incident would have caused anyone enormous stress. Over a year later, when he found out that I was transferring to a team with a woman manager, he made an obvious effort to reverse this earlier incident, with a non-verbal conciliatory message that he no longer viewed me as a misogynist. This was infuriating, as it implied that his initial outrageous behavior was simply a misunderstanding. Also infuriating was the completely irrational notion, explained earlier, that misogyny could even remotely explain anything here. The obvious reason for Mr. Hayden's change in attitude was that because of my worsening health and physical condition, women were not responding to me the way they had been the year before.

This pattern of behavior by Mr. Hayden was almost duplicated by another manager, Alan Helms. After my replies to Ms. Hoang on the message board, Mr. Helms exhibited obvious hostile attitude toward me, but it was passive. However, the same pattern holds, because after he found out that I was transferring to a team with a female manager, he also used very obvious conciliatory non-verbal communication to let me know that I wasn't a misogynist any longer. Note that Mr. Helms replied to Ms. Hoang's post on the message board before I did, and the tone of his reply is that of praising a five-year old child, so his view of me as a misogynist was projection.

People Refused to Work with me Properly

It had become impossible to do my job, unless I was working with specific teammates, because men in the office often refused to work with me properly. Below are examples of this.

1. One of the people who "liked" Ms. Hoang's comment on the message board, Volodymyr Kleban, refused to respond to an email I had sent him requesting information, although it would have only taken him seconds to either answer the question or refer me to the

person who could. I later sent him another email asking why he didn't respond, which he also ignored.

2. I worked with Jeff Brenwald and Paul Manning on one project late in 2018. I was new to the project, so they used their position to oppose me, punish me, infuriate me, to the detriment of the project. At one point the logical next step was to ask the vendor for something, Mr. Brenwald condescendingly and infuriatingly said it wasn't the right time to do that, wasting everybody's time. Eventually my manager got involved and asked them to do what I had suggested before, but still neither of them would contact the vendor. At my manager's suggestion I emailed the vendor myself, which then prompted Mr. Manning to text me for information so he could get involved and not be made to look like he wasn't doing his job. It was remarkable the priority they were placing on punishing me. Earlier in the project I was discussing an issue with Mr. Brenwald via email, and when his view was shown to be incorrect, his replies took on hysterical tone as if the priority was to make me wrong. The collaboration between Mr. Brenwald and Mr. Manning showed the apparent agreement among the men in the company that they would be at war with me.
3. In the past I had worked well with Casey Arbaugh, but after my replies to Ms. Hoang on the message board, the following occurred. He pretended I wasn't in the room when we were supposed to be working together, which was humiliating. After he discussed an issue with the other developer in the room, he eventually arrived at what I had already suggested, but had pretended he hadn't heard.
4. In the past I had worked well with Swamiappian Subramanian (spelling), but after my replies to Ms. Hoang on the message board, the following occurred. We were both involved in a Production issue, the response to which was being coordinated by an email thread. He completely ignored my replies on the thread, forcing me to resort to copying a manager, and becoming contentious in tone. If I hadn't done that, the correct outcome wouldn't have been achieved. It was bizarre and infuriating.
5. In the past I had worked well with Frank Peltier, but after my replies to Ms. Hoang on the message board, the following occurred. He was working as a system administrator, and he was supporting me on an issue. He tried to justify that he had stopped working on the issue, without notifying me, and with no intent to return to it, in the following way. He became contentious, and copied and pasted a prior message from our conversation, after modifying it to prove something that wasn't true, hoping I wouldn't notice his edit. This was completely out of character for him in my years of experience.
6. In the week before I was terminated, I created a service request for a system that is owned by Ms. Hoang's team. The technician who responded to it, Marc Pletinckx, responded to it in a way that was obviously meant to punish me for my replies to Ms. Hoang on the message board. He not only mocked me and belittled me, but he did it by pretending that I had said something that I hadn't said.
7. Gilbert Brown was a system administrator who punished me for my replies to Ms. Hoang in at least two ways. First, he was hostile and overbearing when he came to my workstation and stood right over me to tell me to mute my laptop, in front of other people, despite the fact that we were not in one of the office areas that were designated quiet zones. Second, when I was working with him by email, with other

people on the thread, he sent a response which was inappropriate, unnecessary, and probably factually incorrect, to embarrass me.

8. There was an incident involving Rajesh Rao that I didn't include in the complaint, because it was too upsetting for me to deal with. I might document it later.
9. There was an incident involving Russell Ruud, or a series of incidents, that I didn't include in the complaint, because it was too upsetting for me to deal with. I might document it later. This occurred late in 2017, and I think it was after my replies on the message board. If not, I don't know what else could explain it.
10. There were other upsetting or outrageous incidents in the office in response to my replies on the message board.

Message Board Posts

**Campus US — Grace HOANG**

Could we please have whiteboards and/or whiteboard walls in all of the meeting rooms? So often I feel the urge to draw or diagram something while in a meeting. This would be so helpful!

Like Share 21 September 2017 at 11:59

Volodymyr KLEBAN, Maxim KIROV, Ryleigh LEE, and 4 others like this.

**Alan HELMS**

Agree! Agree! If we don't want the mess of markers, can we try a couple of smart boards?

Like 21 September 2017 at 22:07 via Salesforce for iOS

**Ryleigh LEE**

I totally agree. It's hard to do brainstorming without whiteboards

Like 22 September 2017 at 10:00

**Becky ALMODOVAR**

noted we will work on it

Like 1 person 22 September 2017 at 10:09

**Otmane BENALI**

We very much need them whiteboards 😊 Thank you Becky!

Like 22 September 2017 at 18:09

**Bill HOPE**

A decent drawing program on your laptop hooked up to the TV? You can easily save it and you never have dried out markers (and easy to clean)?

Like 25 September 2017 at 12:25

**Paul OKANES**

Could meeting rooms be equipped with a tablet that has a stylus, the tablet's drawing program could be mirrored on the TV. Would be more secure than whiteboards because sensitive information wouldn't be left on the whiteboard if it's not erased after the meeting. There would be no searching for markers if there aren't any in the room or if they're dried out, and the next meeting wouldn't be kept waiting while the whiteboard is photographed and erased.

Like 07 October 2017 at 08:20

**Becky ALMODOVAR**

We will check if we have some in storage. We had purchased a few which were not very popular. If not we have to ask for budget next year

Like 09 October 2017 at 11:33

**Paul OKANES**

People would have to get used to them. They would be more secure than whiteboards that are photographed with people's personal cell phones, and aren't always erased after meetings.

Like 09 October 2017 at 12:46

Sex Discrimination Lowered my Salary

Shirish Lawate lowered my annual raise and bonus payment for 2019. He did that by dishonestly modifying my performance appraisal document, to grossly misrepresent my work for the year, and justify a lower performance rating. Mr. Lawate's actions were entirely motivated by sexual harassment of me by women.

Management covered up what Mr. Lawate did to my performance appraisal and my salary. The motive for the cover-up also involved an incident that I brought out at HR's request, when Mr. Lawate dishonestly manipulated a document in 2015 to hide his own failure. However, management could have corrected what was done to me, without admitting anything that was embarrassing to them. They chose not to, which is typical of how I was treated by men in that company for many years, and even more so after my replies to Grace Hoang on the message board. And, it was further motivated when Tia Neal obviously angered the executive for IT Craig Young by blatantly showing off her figure to me in Mr. Young's presence. HR's investigation into the salary discrimination resulted in a weak, dishonest cover-up. That's why the HR manager left no written record of the investigation's conclusions, or of the fact that the investigation was ever concluded.

Sexual Harassment was the Motivation

Management's cover-up of Mr. Lawate's actions was motivated by two things:

1. Executives, and senior management, viewed me with hostility and contempt following my replies to Ms. Hoang on the message board. I know that's true in the case of Craig Young, the executive for the IT division, based on his passive-aggressive reaction to seeing me in my car in the parking lot in 2017. Prior to that day in the parking lot, I didn't know he was aware of who I was. There was a widespread perception that I had, in a public forum, impugned Ms. Hoang's competence, and had belittled her. That would have been a big issue for senior management, given Ms. Hoang's prominence in the company as a young female manager in IT.
2. Craig Young was motivated to cover up Mr. Lawate's actions that lowered my salary, because he was angered by Tia Neal blatantly showing off her figure to me in his presence. That occurred in 2019.

Mr. Lawate's actions to lower my salary were motivated by the sexual harassment of Grace Hoang and Archana Deshpande, as described in the sections below.

Effect of Harassment by Ms. Hoang

Mr. Lawate's animosity toward me mushroomed in the period after I posted replies to Ms. Hoang on the message board. Like the whole company, Mr. Lawate interpreted my replies on the message board as a personal rejection of Ms. Hoang, an attractive woman.

There was an incident in March of 2018 in which Mr. Lawate subjected me to humiliation and degradation, because I answered a question that was asked by the only woman in the room, after Giri Krishnapillai had failed to provide the best answer. I asked the Internal Audit investigators to interview this woman, Alyssa Berman, and it's likely she told them she concurred with my interpretation of the incident. It's also likely she told Internal Audit that this incident was the reason she transferred out of Mr. Lawate's team shortly after I did, because she couldn't tolerate or condone the outrageous treatment I had received from management.

Prior to my replies to Ms. Hoang on the message board, neither Mr. Lawate nor Mr. Krishnapillai would have reacted in such a deeply bizarre fashion, to me answering a question that was asked by a woman.

This incident is why I finally decided to transfer out of Mr. Lawate's team. And, if I had remained on his team, without the provocation of my replies to Ms. Hoang, he never would have dishonestly lowered my salary.

Effect of Harassment by Ms. Deshpande

1. There were incidents where Mr. Lawate and others observed Ms. Deshpande inappropriately expressing her attraction to me, and in one case a male teammate, Guna Kota, couldn't hide that he was enraged by it, as described earlier.
2. One of the quid pro quo sexual games that I had to play with Ms. Deshpande, affected Mr. Lawate. When Ms. Deshpande was stringing me along in my attempt to join her team, I had to spend hours looking up her skirt, on two separate occasions. And, Mr. Lawate's reaction to seeing me in the office on the day I did that the first time, on my work-from-home day, was a blatant indication that he saw a connection between my unexpected presence in the office that day, and something else. That something else had to be Ms. Deshpande telling Mr. Lawate that she was taking me from his team. She must have told him that after I had satisfied the quid pro quo that day. That was clarified and magnified for Mr. Lawate, because he must have seen the way Ms. Deshpande was dressed that day. I.e., she had prepared for me looking up her skirt that day, by wearing a shorter skirt than I ever saw her wear before or since, and she was more attractive than usual in other ways that day. I observed Mr. Lawate putting all these things together in his mind, in the moment that he saw me that day. I can only imagine the escalation in his animosity.
3. On the morning that it was officially announced that Mr. Lawate was removed from his management role, following my allegations against him, he came and sat next to Ms. Deshpande. He rarely if ever sat near us. He had an apparently emotional conversation with her, while they were sitting a short distance from me. I didn't overhear their conversation, possibly I was wearing headphones.
4. Mr. Lawate is Indian, Ms. Deshpande is an attractive Indian woman, and I'm white.

5. The pattern of Mr. Lawate's discrimination and harassment of me over many years, starkly tracked my marriage and separation. The only time he could tolerate me, was when I was with my wife, and he didn't have to imagine that I had opportunities with women that he never had. Before and after that period, it was very different. And, his reaction to finding out I was separated, was bizarre and disturbing. This is described in the section "Illegal Discrimination and Harassment by Men".

Summary

Annual raise and bonus payments are determined by performance rating. My salary and bonus payment were lowered as a result of a dishonestly and maliciously lowered performance rating. The motives for this are described in previous sections. Investigations were conducted by HR and Internal Audit, which failed to acknowledge or remedy either the dishonest, unfair lowering of my salary, or the other issue that came out as part of the investigation. This failure involved conspicuous dishonesty and subversion of responsibilities in all levels of SWIFT management, across multiple divisions, as well as HR rank-and-file. Some of this is described in the section "SWIFT's Accountability for Discrimination."

Mr. Lawate's Actions to Lower my Salary and Bonus

In Feb 2019, I had my final year-end performance review meeting with Mr. Lawate. After the meeting, I realized that two of my biggest projects of the year were missing from my performance appraisal document. (A "project" was known as a "WHAT Objective" in SWIFT terminology. I will use the word "project" here.) I also noticed that he had manipulated the document in an attempt to prevent me from discovering that those projects were missing. That manipulation had enabled him, in our final year-end review meeting, to decline to review the projects in the document. Therefore, in the meeting, I didn't realize that some were missing. However, after the meeting, I noticed they were missing. He hadn't expected that.

Mr. Lawate had been my manager for nine years. That was the first time he manipulated my PA document in that way, which I can prove. It was also the first time he had declined to review the projects in the document in the year-end review meeting.

He denied deleting the projects, and claimed that he didn't ever remember seeing them there. This was an obvious lie, especially considering he added one of the projects to the document in the beginning of the year, and that project was updated by both of us for the mid-year performance review meeting, then updated again extensively by me in October in preparation for the year-end review. The other missing project was added by me in October in preparation for the year-end review, and it was a major project for the year. Deleting the projects grossly misrepresented my work for the year, and justified a lower performance rating than I deserved, and lower than the rating I had received in the previous five years. After the projects were removed from my PA document, Mr. Lawate presented the document

at the managers' meeting in which the documents are reviewed, and the tentative performance ratings are finalized. He presented my PA document at the meeting, knowing full well that two of my biggest projects of the year were missing from the document.

The performance rating I was given was obviously lower than the rating I deserved. That's why Mr. Lawate had to delete projects from my document to justify a lower rating.

[Asking HR to Investigate](#)

I asked HR to investigate, although I knew from the beginning that HR would never admit that Mr. Lawate had done anything wrong, or that there was any issue that needed to be remediated. I sent an email to Ms. Deshpande immediately after I sent the complaint to HR, to let her know that because of this issue, I might not be sitting next to her the following week. I mentioned in that email, that I was stressed because I knew that HR wasn't going to admit that there was any issue.

The HR manager Susan Ahalt first discussed these issues with the head of the internal audit department, Peter Dekoninck, and also with the legal department. Mr. Dekoninck didn't inform me that the investigation could be conducted by the Internal Audit department. When Ms. Ahalt asked if I would consent to the investigation being conducted by her, I agreed. Mr. Dekoninck would not have had the option of leaving no written record of his investigation or conclusions, as Ms. Ahalt did.

[HR Request for Information about Other Fraud or Dishonesty, and Ensuing Threat](#)

In one of my initial meetings with Ms. Ahalt, she asked if I knew of any other incidents of fraud, or dishonest manipulation of a document, by Mr. Lawate. I had knowledge of one prior incident, but I was very hesitant to come forward with it. However, at her urging, I did. Immediately after I provided the evidence of this prior incident from 2015, the senior IT manager Arnaud Boulnois gave me a clear nonverbal warning and threat. I arrived in the office in the morning, and as I was hanging up my coat, Mr. Boulnois got my attention by pointedly looking at me, with a threatening look. And, he held the threatening look until I looked away. I interpreted this threat by Mr. Boulnois as follows: "If you persist in trying to get justice for the outrageous discrimination to which you have been subjected by this company, you will be punished." At that point I still had some additional information about the prior incident which I hadn't yet provided to Ms. Ahalt. I felt like I was being intimidated by Mr. Boulnois into not providing the remaining information, but I provided it in defiance of his threat. This caused me added stress, which exacerbated my medical conditions. I did this because the additional information was required to properly investigate the incident, and the HR manager had requested evidence of a prior incident like this one.

[Motive to Cover-up incident from 2015](#)

The desire to cover up the incident from 2015, provided added motive to cover up Mr. Lawate's dishonest actions regarding my performance rating. It also further illustrates the dishonesty of SWIFT management.

Mr. Boulnois had very recently started in his role. He had come from a different organization within the company, and would not have been familiar with the issues pertaining to Mr. Lawate's prior fraud/deception, which occurred in 2015.

Mr. Boulnois reported to the executive for IT, Craig Young. Mr. Young had a very powerful motive to cover up the issue from 2015. This explains the threat from Mr. Boulnois. However, it doesn't explain why management couldn't have corrected what was done to me, without admitting anything that would be embarrassing to them.

In 2013 or 2014, there were three high-profile Production problems involving a product for which Mr. Lawate was responsible, the Enterprise Directory. In response to these problems, Mr. Young created an initiative called the "Deep Dive." Its purpose was to do a detailed and holistic review of the product, identify possible improvements, and prevent the previous problems from recurring.

That initiative was led by Mr. Lawate, which was an obvious conflict of interest. It allowed Mr. Lawate to cover up the fact that he had failed to implement the software for this product in the way that was recommended by HP. Covering this up, rather than acknowledging it, increased risks to the availability of the critical services that SWIFT provides to the global financial industry. Allowing Mr. Lawate to lead the Deep Dive gives the impression that it was only put in place for appearances, to placate the board of directors. Or, that Mr. Young is incompetent. Also, it would damage the company's reputation to reveal that a software development manager had behaved in this way.

HR Cover-up

HR's investigation of my allegations resulted in a weak cover-up. During the investigation, Mr. Lawate was removed from his management role, while management denied the allegations against him. I.e., salary discrimination, as well as the incident from 2015. The approach to removing Mr. Lawate from his management role evolved over a one-week period, as management tried to find a way to eliminate the appearance that he was removed for cause. I can prove that the decision to remove him from his management role was not made in advance. I.e., I can prove that the decision to remove him from his management role was made immediately after I made my allegations against him. However, I can't prove how the approach to removing him evolved over a week, in order to eliminate the appearance that he was removed for cause. But I did mention that evolution in an email I sent to executives, in which I asked to appeal HR's decision in my case to the board of directors. In that email, I said that evolution should be investigated. See the email later in this section.

Ms. Ahalt's conclusions, only conveyed to me verbally, relied on collusion with Mr. Lawate's manager Giri Krishnapillai. Mr. Krishnapillai was the only other manager who would also be accountable for what was being covered up in the incident from 2015, and he might also have been accountable for Mr. Lawate's actions regarding my performance rating. All her evidence

came from Mr. Krishnapillai, the one manager who had a conflict of interest. And his evidence, although almost certainly lies, was patently irrelevant to the allegations.

According to Ms. Ahalt, the incident from 2015 wasn't an attempt by Mr. Lawate to cover up his failure, because Mr. Krishnapillai knew that the software hadn't been implemented properly. However, even if he knew that, Mr. Krishnapillai would also be motivated to cover it up. The intent of the cover-up was to hide this information from all the rest of IT and Production management. Furthermore, I saw the cover-up, both in a document that was published in the company's SharePoint repository, and in the way he conducted the Deep Dive meetings. And, Mr. Lawate spoke to me personally, and told me not to bring up the subject again at the Enterprise Directory Deep Dive meetings, i.e. the suggestion to implement the recommendation from HP that he had failed to implement. The cover-up was real and obvious.

Ms. Ahalt said that there had been no issue with my performance rating. She said that the missing projects had undoubtedly been present in my performance appraisal document, and only myself or Mr. Lawate could have deleted them. However, she said that it wouldn't be a violation of policy if Mr. Lawate had deleted them, only of best practices. I.e., grossly misrepresenting my work for the year to justify a lower performance rating, then manipulating the document in an attempt to prevent me from discovering that the projects were missing, and then lying about all of it, would not be a violation of policy. However, such behavior would constitute illegal discrimination depending on the victim's membership in protected classes, and SWIFT policy must prohibit illegal discrimination.

Ms. Ahalt also said the projects could have been deleted by a system error. However, if deleting the projects were a criminal offense, then that absurd suggestion would not prevent a conviction in a criminal trial, especially considering the proof of extreme animosity by Mr. Lawate towards me, his lies that the projects were never there, his manipulation of the document in an attempt to prevent me from finding out the projects were missing, and the performance rating that was blatantly lower than it should have been.

Ms. Ahalt claimed that when my performance appraisal was reviewed by the other managers, Mr. Krishnapillai had taken notes, and his notes showed that the projects that were missing from my PA document had been discussed. For several reasons, that must certainly be a lie. However, even if it were true, it wouldn't be relevant. Managers review the projects described in the PA document to assess performance, and anything else discussed as an afterthought would carry far less weight. But more importantly, the projects are described in the document in my words, not by a manager whose extreme animosity toward me is in evidence. I put time and effort into documenting those projects, but that wasn't seen by the other managers. Most importantly, the performance rating I received was blatantly lower than it should have been.

In any case, the missing projects couldn't have been mentioned in any file of notes from Mr. Krishnapillai. If it were necessary to record everything that is said in a PA review meeting, it would be recorded by, or on behalf of, the manager whose organization includes all the employees whose PAs are being reviewed. That wouldn't be Mr. Krishnapillai. When I asked Ms. Ahalt if I could see the timestamp of this file of notes, only the timestamp, she said I couldn't because it was confidential. Also, I felt that her reaction to this question involved a sudden and disproportionate change in her demeanor and tone of voice, which suggests dishonesty.

In summary, HR's position was that the fact that my PA document was presented at the managers' review meeting with my work for the year grossly misrepresented, which justified a lower performance rating than I actually deserved, causing me to receive a lower raise and bonus, wasn't an issue that needed to be addressed. And, Mr. Lawate maliciously and dishonestly modifying my performance appraisal document to justify a lower rating, and trying to cover it up, and lying about it, was not a violation of policy, only of best practices.

Internal Audit Cover-up

I replied to Ms. Ahalt on my initial whistleblower email, and copied the CEO and heads of Legal and HR. I said that I wanted to appeal her decision to the board of directors. My email described overwhelming evidence of a cover-up by HR and IT. See the email later in this section.

A couple days later I received a short email from Mr. Dekoninck saying that his department would conduct an investigation, and also admonishing me that I should only bring allegations if I have reasonable cause to do so. Mr. Dekoninck had discussed this case with Ms. Ahalt before she began her investigation, and he also saw the email I sent copying executives with all its damning information, so I saw his admonishment as a provocation. I believed that his investigation would be another weak cover-up, so I sent an angry reply that I expected his investigation to be a cover-up, and that I would consult a lawyer. I also said I would cooperate with his investigation.

I discussed Mr. Lawate's actions with the Internal Audit investigators, with regard to both my performance appraisal, and the incident from 2015. I also informed Internal Audit about something that I had kept from HR, i.e. the incident which demonstrated Mr. Lawate's extreme animosity toward me. I didn't tell HR about that, because I was worried that my replies to Grace Hoang on the message board would be brought into it. The incident that demonstrated extreme animosity was the following. In March of 2018, in a formal combined team meeting, Mr. Lawate subjected me to humiliation and degradation when I answered a question that was asked by the only woman in the room, after Mr. Krishnapillai failed to provide the best answer to her question. Internal Audit interviewed this woman, Alyssa Berman, about the incident. As I mentioned, it's likely she concurred with my interpretation of the incident, and it's also likely she told Internal Audit that she transferred out of Mr. Lawate's team shortly after I did because of that incident.

Internal Audit studied timesheet records to determine whether or not I worked on the projects in question, which would indicate whether or not the projects would have been present in my performance appraisal document. Studying timesheet records was a dishonest scheme to set up a farcical claim that there was no evidence that I spent sufficient time working on those projects. Possibly they planned to use the fact that my timesheet records for one or both of the projects were probably under an umbrella project, that didn't specify the actual project, which was a common practice.

In actuality, it can be proved by many people, and in many ways, that I worked on those projects extensively throughout the year. One of the projects I worked on beginning in January, and I continued to work on it in periods throughout the year. The other project I worked on beginning in the summer. Even the HR manager said she had no doubt the projects had been present in my performance appraisal document. One of the projects was added to the document at the beginning of the year by Mr. Lawate, and updated by me at mid-year, and again in October. The other project was added to the document by me in October. Claiming that there was insufficient evidence that I had worked on those projects, or had spent sufficient time working on them, based on a review of timesheets, was extraordinarily dishonest and farcical.

I provided many emails, and other evidence, showing I worked on those projects throughout the year. Hypothetically, if they still had any genuine doubt that I worked on those projects extensively, then I could have named witnesses, and provided more evidence. But that is a hypothetical scenario, where they could have had real doubt.

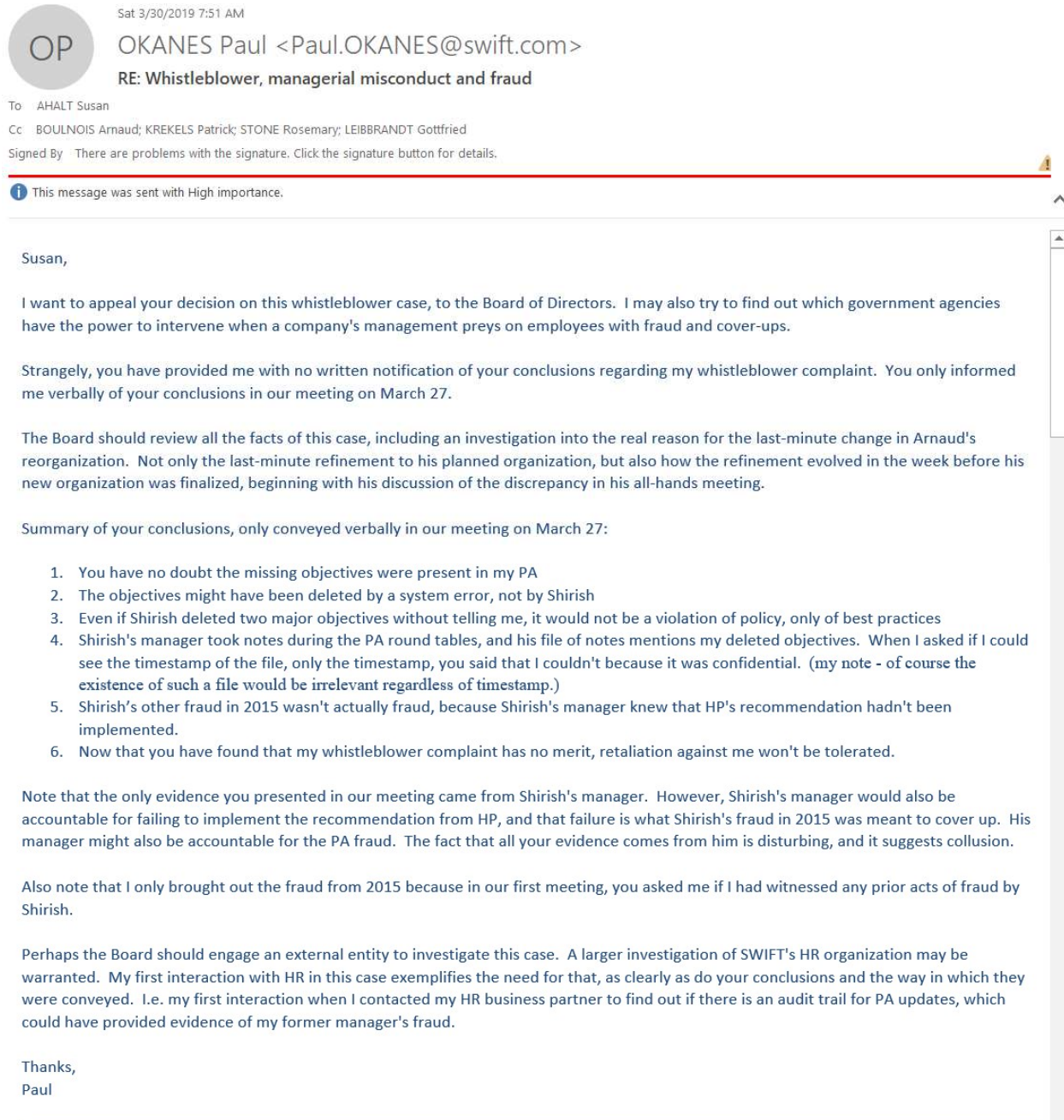
Note that the approach taken by Internal Audit implies that Giri Krishnapillai and Susan Ahalt lied about the notes that Mr. Krishnapillai had supposedly taken when my performance appraisal was discussed with the other managers. If there were a file of notes which proved that I worked on those projects that year, to the point that they were discussed in the meeting with the other managers, then there is no reason to review the timesheet records. Of course it's extremely unlikely that such a file of notes actually existed, unless it's a forgery created after the fact.

I received a terse email from Mr. Dekoninck one business day before I was terminated, stating that his investigation found "no evidence" supporting my allegations. Not only is it an outrageous lie to say there's no evidence supporting my allegations, it also fails to address the key fact that is not in dispute. I.e., that my performance appraisal document, and performance rating, were reviewed by the other managers when two of my biggest projects of the year were missing from the document. And, under those circumstances, my performance rating was confirmed by the other managers. My rating was obviously lower than it should have been, for that reason.

Mr. Dekoninck's note also failed to acknowledge that Mr. Lawate was removed from his management role immediately following my allegations, and that wasn't planned in advance.

Email Escalating the Cover-Up to Executives

Following is the email that I sent to escalate to executives the issue of HR's cover-up of Mr. Lawate's actions. This email led to the Internal Audit investigation.



SWIFT's Accountability for Discrimination

In this section, I describe the reasons why I think SWIFT should be accountable for sex discrimination that was perpetrated by its employees, managers, executives, and Internal Audit. This is in addition to the reasons described in the section about the cover-up of salary discrimination.

Grossly Unfair Treatment by HR and Senior Management in 2015-2017

I was treated grossly unfairly by HR and IT senior management in the period 2015-2017. That made it absurd to think that I could report sexual harassment to HR.

For two consecutive years, my annual raise and bonus payment were the extreme opposite of being commensurate with my performance ratings. For both of those years, my raise was exceptionally and excessively low, but my performance ratings were excellent. My bonus payments were also thousands less than they should have been based on my performance ratings. Having two consecutive years of an extremely low raise, would be devastating to my salary at retirement age if I had remained with the company. HR was complicit for not questioning the extreme disparity between my performance rating and my raise and bonus. The senior manager in IT who was responsible for this, Shishir Srivastava, retired in 2017, and this problem ended after his retirement. However, HR management had been complicit, and they didn't retire.

In 2017, my exceptionally low raise, and low bonus, could be attributed in part to the fact that I had to decline the invitation to the seniorities dinner in 2016. I explained when declining the invitation that I had recently had two surgeries on my prostate. Mr. Srivastava realized the outrageousness and arrogance and of his actions, based on his bizarre reaction to seeing me in the office after my raise and bonus were announced in 2017. He was on the phone and sitting in a chair, and he spun around in a panic when he sensed me walking down the hallway, as if I were pointing a gun at him.

In 2016, my exceptionally low raise, and low bonus, were motivated in part by an unofficial, unwritten, and unfair reprimand I received the previous year. However, neither HR, nor IT senior management, ever discussed the reprimand with me. And, there was never anything official or in writing for me to respond to. At the time, I wasn't concerned about that, because I was told by my manager and by his manager, that there was no reprimand. I.e., HR would have no record of it. So, I was very surprised when my raise for the following year was extremely, exceptionally low, and my bonus was thousands lower than would be expected from my performance rating.

The unofficial reprimand was for the following reason. I received an email from a colleague, Michael Li. The email unnecessarily copied many people, for the purpose of belittling and disrespecting me, and representing that I was inept. The purported reason for his email didn't

make sense, his criticisms of my work didn't make sense, and he assigned tasks to me that didn't make sense, and the assignment itself was inappropriate.

I was on vacation when I received the email. I called Mr. Li on his cell phone, and I angrily told him that I would contact HR, and management, if he ever disrespected me again. I made no personal threats, I only told him I would contact HR and management.

After my manager, and my manager's manager, discussed this with me, I apologized to Mr. Li by email. However, I'm not sure that an apology was warranted.

Mr. Li made an effort to let me know there were no hard feelings, and he made small talk with me a couple of times, which he'd never done before. I interpreted that as his acknowledgement that he had been out of line with his email.

Mr. Li's email wasn't as severely disrespectful as other incidents that were happening at that time, because my health was improving, and men were becoming more and more enraged that I was more attractive to women. The harassment was accelerating. I'm sure that's also the primary reason for Mr. Srivastava's grossly unfair treatment of me.

[Actions of HR Business Partner Ignace Bruynseraede](#)

I describe here the actions of the HR representative, or "business partner," Ignace Bruynseraede. I contacted Mr. Bruynseraede before I raised the whistleblower complaint with HR that is described in the section "Sex Discrimination Lowered my Salary". I wanted to find out if HR's computer systems maintained an audit trail that could provide "smoking gun" evidence of Shirish Lawate's actions that are described in that section, and that could also be used to undo his actions.

Mr. Bruynseraede reflexively tried to suppress my allegation of managerial misconduct, and he resisted finding out if an audit trail existed. Only after I asked him who his boss was, did his attitude change, and he sent an email to the appropriate technician who would know about the audit trail. My conversation with Mr. Bruynseraede occurred via text in Jabber, and I have a screenshot of it.

Mr. Bruynseraede created a very powerful impression that SWIFT HR business partners are trained to suppress allegations of managerial misconduct.

Below is an excerpt of my conversation with Mr. Bruynseraede. In this excerpt, he wants me to send an email to my manager, before he simply asks someone if an audit trail exists. Then, he implies that an audit trail is actually unnecessary, because Mr. Lawate would "speak the truth." Of course, Mr. Lawate had already denied my allegation when I contacted Mr. Bruynseraede. See Mr. Bruynseraede's statements circled in red. I can also provide this entire conversation.

BRUYNSERAEDÉ Ignace	
Paul, I understand you want to know the facts and I will ask but wouldn't it be easier to send your manager an email and put me in 'cc' whereby it becomes a bit more official	4:38 PM
OKANES Paul	
Why would that help>	4:38 PM
?	4:38 PM
BRUYNSERAEDÉ Ignace	
why would he not speak the truth?	4:39 PM
if he did, than he can explain why. Why does an audit trail make this situation different	4:39 PM

My Email to Peter Dekoninck and the Reaction to it

This section describes an email that I sent to Peter Dekoninck, and the reaction to it.

The HR manager Susan Ahalt spoke with me before she began her investigation of my allegations against Shirish Lawate. At that time, she told me that she had discussed the case with the head of Internal Audit Peter Dekoninck.

After her investigation was completed, I sent her an email that copied executives, which asked to appeal the conclusions of the investigation to the Board of Directors. In response, an investigation by Internal Audit was initiated. Shortly after that investigation began, I sent an email to Mr. Dekoninck, which asked two questions about the investigation process. The questions were:

1. Before Ms. Ahalt commenced her investigation, she asked me if I would be comfortable if she conducted the investigation. Was she required to ask me that question?
2. After you discussed this case with Ms. Ahalt in February, why didn't you contact me and tell me that I had the option of having the investigation conducted by Internal Audit instead of HR?

The above two questions may not be verbatim from the actual email, but they're close to verbatim, and the meaning is identical here and in the email. I copied other members of Internal Audit on that email.

The next day that I was in the office, after sending the above email to Mr. Dekoninck, Ms. Ahalt did the following. She made an effort to get me to look up at her from my computer screen, and then she gave me a very clear censuring reaction as she looked back at her screen. It seemed immediately obvious that she had been chastised by Mr. Dekoninck for divulging to me that she had discussed my case with him at that earlier date. And, she was letting me know that I was wrong for betraying to Mr. Dekoninck that she had told me about her conversation with him.

From Ms. Ahalt's reaction, and from the rebuke she presumably received from Mr. Dekoninck, I received a very powerful impression about SWIFT management. I.e., that throughout the entire company, there are protocols in place that were established for the purpose of subverting stated roles and responsibilities. In fact, I had seen other evidence of this, as described later,

but to perceive it in the head of the Internal Audit organization was actually surprising. I couldn't possibly expect to be treated fairly if I reported sexual harassment by prominent women in the company, as well as by other women, given that management environment.

The same day that Ms. Ahalt reacted as described above, the local manager for Internal Audit Bradly Van Camp greeted me in the hallway with a demeanor and energy that I was certain was also the result of my email to Mr. Dekoninck.

Mr. Dekoninck never responded to my email nor answered the two questions therein.

[SWIFT Management Did Nothing to Restrain Sexual Harassment](#)

I was a SWIFT employee for twenty-three years, and I have no memory of ever receiving any information about the company's policy on sexual harassment. As far as I know, the company had no policy on sexual harassment. This explains the number of incidents of sexual harassment that are described in the complaint, and the far greater number that actually occurred, many of which are described in this document.

[Senior Manager Blamed Me for a Woman's Inappropriate Behavior](#)

Dhiru Thaker was the senior manager in my organization in the late summer or fall of 2017. At that time, he observed Ryleigh Lee inappropriately flaunting her buttocks for my benefit in the office. His reaction was the following. He got my attention, and then gave me an extreme, exaggerated look of accusation and disapproval, as if it were my fault. He didn't blame her, he blamed me. That shift of blame was gender-based, and it influenced me to try to connect with Ms. Lee, to my detriment. It also caused me to worry about my raise and bonus for the following year. If the senior manager in my organization blamed me for inappropriate sexual behavior by a woman, then I could not reasonably expect to be treated fairly if I reported sexual harassment, not only by women like Ms. Lee, but also by prominent women in the company.

[Disturbing Observations of Corrupted Management Culture](#)

In my last few years in SWIFT, there were two occasions when I observed that SWIFT management and senior management, in the IT and Production divisions, were brazenly dishonest and disingenuous in claiming compliance with security initiatives. Given the importance and high-profile nature of security initiatives in SWIFT, I was very surprised by this, and it's yet another reason I believed that SWIFT's management culture was based on subverting stated roles and responsibilities. This is further reason I believed I would have been treated grossly unfairly if I had reported sexual harassment by many women including prominent women in the company.

These two incidents were unrelated to the issue I reported to HR as described in the section on my salary being lowered by sex discrimination, regarding cover-up of failure to implement software properly.

First Exposure to Management Culture of Dishonesty

I've been aware of the culture of dishonesty in SWIFT senior management for many years. My first exposure to it occurred shortly after 9/11, when the senior manager Shishir Srivastava lied, for a disturbing reason.

Mr. Srivastava's lies made me unwittingly complicit in SWIFT's compliance with administrative subpoenas, that required SWIFT to turn over customer information to the U.S. Treasury Department, as part of terrorism investigations. I.e. the Terrorist Finance Tracking Program (TFTP). I became aware that one of the U.S. government's acknowledged counter-terrorism strategies was "rendition," i.e. abducting people with no due process and sending them to secret CIA prisons where they were tortured. Mr. Srivastava's lies made me complicit in that.

A few weeks after 9/11, I was asked to write computer programs that would organize and encrypt information regarding customers' financial transactions, so that it could be delivered to the Treasury department. I was also asked to write a program that could be used by Treasury to decrypt this information. However, when I was asked to write these programs, Mr. Srivastava told my immediate manager, who relayed to me, lies about their purpose. He said that customers were concerned that SWIFT could be the target of a terrorist attack, and their data in SWIFT operating centers could be destroyed. As a result, they were requesting that we deliver their own data to them, where they could archive it on their own premises. He said the programs that I was asked to write would be used for that purpose, i.e. to send customers their own data. The truth was different; in actuality I was asked to write these programs so that customers' data could be delivered to the Treasury department for terrorism investigations, without the customers' knowledge. I wasn't given the option to decline the assignment based on the true purpose of the programs. Not until the New York Times broke the story five years later, did I learn their true purpose. After that, the delivery of customer data to the Treasury department continued as a documented program, and so I didn't refuse to continue maintaining the software, and I remained the sole developer for it. At that point, those at risk could protect themselves, and so I didn't decline to continue working on it. I believe that eventually these programs were also used to deliver data to actual customers, other than the Treasury department, but that occurred later, and much less frequently.

Possible Reactions of SWIFT to the Charge of Discrimination

The charge of discrimination was served on SWIFT in December or January. In late January, I received a phone call, that I'm sure was a threat from SWIFT. It was indirect, but obvious. If I had recorded the call, the recording might not prove that it was a threat from SWIFT, but I have no doubt that it was. I felt the threat when I was typing the portion of the complaint that described senior management's desire to cover up Shirish Lawate's cover-up of his failure to implement software properly.

In early April of 2020, while my phone was in my pocket, it spontaneously called Archana Deshpande. I hung up before she answered. I typically lock my phone before I put it in my pocket, so it seemed very unlikely that the call was made accidentally. I was afraid that SWIFT had remotely hacked my phone, and caused it to make that call. So I deleted Ms. Deshpande from my contacts, deleted the call from the call history, and did a factory reset of my phone. Then I purchased a subscription to a security app for my phone.

In 2021, since the case was removed to federal court, twice I've received text messages on my phone that look like obvious attacks. I've had Android phones for three or four years, and have never received texts like these before. They come from email addresses instead of numbers, and they only contain a link. It looks like the sender hopes I'll tap the link so they can gain control of the apps on my phone.

Motive for Discrimination by Men

For over twenty years, I was subjected to discrimination and harassment by men in SWIFT. This problem escalated at the same time that sexual harassment by women became an issue, in 2015, because men perceived the same thing that women perceived, i.e. that partially effective treatment for hypothyroidism had changed my appearance. The problem escalated again after my replies to Grace Hoang on the message board. The problem also escalated when men observed me being targeted by women for sexual harassment, for example when Shirish Lawate perceived the sexual games between myself and Archana Deshpande. The events of Tech Day 2017 are another illustration of this.

Some examples of harassment and discrimination by men are described in the section "SWIFT's Accountability for Discrimination," in the subsection "Grossly Unfair Treatment by HR and Senior Management in 2015-2017". Other examples are described in the sections "Sex Discrimination Lowered my Salary," and "Company Reaction to Message Board Posts." There were far more incidents than these, many kinds of incidents, going back many years. I felt tortured in that company, and I never left due to medical problems.

The desire to punish me was so strong that it sometimes caused men to compromise their responsibilities, and sacrifice the best interests of SWIFT. There were multiple instances when the quality of SWIFT's Production software was lowered, because a higher priority was placed on punishing me, than on men doing their jobs properly. I'll summarize one such example here, that occurred in 2011. Jason Youngblood was a developer who left the company as soon as he realized that his dishonesty in creating a fake problem that he could blame on me, would soon be found out. When I initially pointed out to the development managers Raju Krishnan and Pradeep Pandit that what he was blaming on me couldn't possibly be true, they unprofessionally denied it, to the detriment of SWIFT's business, so strong was their motive to punish me. Mr. Pandit was unprofessional in his conduct toward me in a way that nobody else would have been subjected to. Some people would find it surprising that I didn't put my hands

on Mr. Pandit. Later that year, I uncovered Mr. Youngblood's dishonesty, and proved that I had been right all along (which was obvious all along, but denied). The great expenditure of time and effort by many managers and others to punish me, by falsely claiming that I had caused a problem, and then by addressing that nonexistent problem in an exceptionally rigorous way, had been a tremendous waste of time, and a lost opportunity to discover the real problem, i.e. the grossly unprofessional behavior of Jason Youngblood. Nobody cared when I brought out the truth, it was swept under the rug. The reason that Mr. Youngblood was forced to flee the company, was that a group of managers wanted to punish me, using a fake problem that Mr. Youngblood had earlier created, also to punish me. I can provide details of this. This, and other similar incidents, can be understood in the context of a grossly overfunded non-profit messaging company with no real competition in its core business.

I won't describe the harassment and discrimination from men that I endured for many years in SWIFT. Instead, I'll describe the pattern of harassment from Shirsh Lawate, since it clearly illustrates the motive for him, and the other men, for their mistreatment of me for many years.

I was subjected to harassment and discrimination from Mr. Lawate before I was married, and after I was separated, but not while I was with my wife. The reason for this stark difference is that while I was with my wife, Mr. Lawate didn't have to imagine that I had opportunities with women that he never had.

I didn't wear a wedding band during my marriage, so very few men in the company would have known my marital situation as Mr. Lawate did.

The following paragraphs illustrate how Mr. Lawate's pattern of harassment was based on my marital situation.

I worked with Mr. Lawate prior to my becoming married in 1999. Prior to my marriage, Mr. Lawate repeatedly disrespected me in ways that years later, I would still recall with anguish.

Following is an example of the kind of incident that occurred before I got married. Mr. Lawate asked me a technical question, and immediately after I started to give him the answer, he developed an affectation. I.e. gestures, posturing, and a facial expression, combined with the words "no! no!" The affectation was that he was trying to immediately stop me from talking, at all costs, implying that not only was I giving him a very stupid answer, but something worse. And, he also seemed to be laughing to himself at the same time, secure in the knowledge that I would accept this humiliating treatment in view of others. A minute later, somebody else told Mr. Lawate that the answer I had given him was correct after all.

This is the kind of harassment from Mr. Lawate that abruptly disappeared after I got married. Years later, he became my manager, and still I rarely had problems with him as my manager. However, that changed dramatically after a hospital visit from Mr. Lawate, as described below.

In 2012, I was hospitalized with a ruptured appendix. Mr. Lawate came to my hospital room to visit me. This is likely because the previous year, something had happened which led Mr. Lawate to believe that I had separated from my wife. He wanted to confirm his suspicion by visiting me in the hospital.

The year before my hospitalization, myself and my wife were invited to have dinner with Mr. Lawate and his wife, to commemorate my fifteenth anniversary of employment with SWIFT. At that time, my wife and I were not yet separated. I told Mr. Lawate that my wife had declined the invitation, which was true. By the time my appendix ruptured the following year, my wife and I had in fact separated.

As soon as Mr. Lawate entered my hospital room, he was only concerned with discussing the reasons that my wife wasn't there, and he found her absence disturbing. I didn't address the issue. Before he left, I asked him if he could charge my iphone. He claimed he asked some people on the hospital floor if they could charge it, and they couldn't. He wouldn't do it himself, which should have been easy for him. I mention this because his tone and manner in refusing seemed disturbing and duplicitous. From this point on, i.e. after his discovery that I was single again, his treatment of me changed 180°, and it became intolerable.

Below is a description of the harassment from Mr. Lawate that resumed after he learned of my separation, after a years-long respite following my marriage. The more severe harassment by Mr. Lawate that occurred later, after the sexual harassment by women became a major issue, is described elsewhere.

I requested a vacation of a week and a half, with no advance notice. I.e., an emergency vacation, that would begin almost immediately. I think that's the only time in my 23 years in SWIFT that I requested such a vacation. My reason for requesting the vacation, was that I was literally afraid that I would have a stroke from the stress of dealing with Mr. Lawate, if I didn't have that vacation. He had started to disrespect me in every way he could in our daily work. I knew that if I complained about it to HR, they would take his side, as they did later when Mr. Lawate's behavior was more outrageous. After the emergency vacation, I was forced to continue to withstand similar treatment from Mr. Lawate.

In 2016, Mr. Lawate asked me if I could be available on a particular date for technical support, because the on-call developer wouldn't be available. Although I wasn't the on-call developer, and so I wasn't paid extra for this kind of availability, I agreed on a goodwill basis to be available. Later, when I was scheduling prostate surgery, I couldn't schedule it as soon as I wanted to, because I had agreed to be available for support. I wasn't called for support that day, and when I asked him about it weeks later, Mr. Lawate told me that the other developer's plans had changed, and so I wasn't needed that day after all. Mr. Lawate never notified me that my goodwill availability wasn't needed that day. As a result, when I was scheduling my surgery, I didn't know that I could have had it sooner as I had wanted to. I can't believe anyone else would have been treated that way by Mr. Lawate.

