

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

	)	
	)	
ANIL KANCHARLA,	)	
	)	
ANILA SEELAMGARI,	)	
	)	
APARNA KADARI,	)	
	)	
BHAVANI PRASAD PAMALA,	)	
	)	
BHAVANI PULI,	)	
	)	
CHAKRAPANI PASUPULEETI,	)	
	)	
DEEPIKA BOOJALA,	)	
	)	
DIVYA CHENNAMANENI,	)	
	)	
HAREESH GAVINI,	)	
	)	
JAYAKRISHNA GORANTLA,	)	
	)	
LAKSHMANA REKHA OBHILINENI,	)	Case No.:
	)	
LAKSHMI SAINATHUNI,	)	Jury Trial: Yes
	)	
LAVANYA CHANGAL,	)	
	)	
LOHIT LAKKIREDDY,	)	
	)	
MADHUSUDHAN GORANTLA,	)	
	)	
PADMA RAO SAINATHUNI,	)	
	)	
PRAVEEN K BUDDHA,	)	
	)	
PUSHPA KONAKALA,	)	
	)	
RAGHU B KAMAROUTHU,	)	
	)	
RAJANI PADURU,	)	
	)	
RAJESH K PUTUMBAKA,	)	

RAMESH NAIDU DASYAM,)
)
)
RAVI MIDDA,)
)
)
RAVINDRANATH MANGALAGIRI,)
)
)
SATEESH CHINTA,)
)
)
SATYA KUMAR KADARI,)
)
)
SREENIVASULU UPPARI PASHANAM,)
)
)
SRIMUKHI MECHINENI,)
)
)
SRINIVASA GAYAM,)
)
)
SUNEEL KANCHARLA,)
)
)
SURESH ADUSUMILLI,)
)
)
SURESH PALADUGU,)
)
)
UMA KARNATI,)
)
)
UMAMAHESWARARAO)
NIZAMPATNAM,)
)
)
VANI AMBATI DAMODARAM,)
)
)
VARALAKSHMI ADIPUDI,)
)
)
VENKATA CHINTA,)
)
)
VENKATA MALLIPEDDI,)
)
)
VENKATESWARLU GOPAVARAPU,)
)
)
VINAY GUNDALA,)
)
)
DEEPTHI BOLISSETTY,)
)
)
JITHENDER GOLI,)
)
)
PRASANNA KUMAR PENUMALA,)
)
)

PRITHVIDER JAVAJI,	)
	)
SAMPADA KORUMILLI,	)
	)
VENKATESWARA CHITTEPU,	)
	)
VIJAY CHAVA,	)
	)
PADMA DEVI KORUMILLI,	)
	)
NAGA HIMABINDU AKULA,	)
	)
GEETHA CHAPPALI,	)
	)
SUNDAR KAMMARA,	)
	)
KRISHNA V. COLLURU,	)
	)
LAXMI NUGOORU,	)
	)
NIRMALA BATTINAPATLA,	)
	)
VENKATA PARIMI,	)
	)
HARI SAGGURTHI,	)
	)
LAVANYA CHAOUTACURI,	)
	)
MADHAVA ANUGU,	)
	)
SANJEEV K CHANDA,	)
	)
SRINIVASA PENDURTHI,	)
	)
SUDHIR GUNNA,	)
	)
PRAJEESH NADOOLI,	)
	)
SATISH PRASANNA,	)
	)
SACHIN BEHL,	)
	)
NIBU PAUL,	)
	)
SMRUTHI PURELLI,	)
	)

Plaintiffs,)
)
 v.)
)
 FEDERAL NATIONAL)
 MORTGAGE ASSOCIATION)
 1100 15th Street NW)
 Midtown Center)
 Washington, DC 20005)
)
)
Defendant.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. PARTIES

A. The Plaintiffs

Anil Kancharla
42663 Gulicks Landing Ct.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 14 Years
EEOC Filed: 6/18/2025
Right to Sue Obtained: 6/29/2025

Anila Seelamgari
1106 Morningwood Lane
Great Falls, VA 22066
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 12 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Aparna Kadari
44414 Stonerun Pl
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 18 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Bhavani Prasad Pamala
3710 Spicebush Drive
Frederick, MD 21704
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 12 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Bhavani Puli
44379 Hempland Dr
Ashburn, VA 20147
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Washington D.C.
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Chakrapani Pasupuleeti
23007 Caterham Dr.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannnie Mae - Reston
Employed 15 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Deepika Boojala
19754 Willowdale Place
Ashburn, VA 20147
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 15 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Divya Chennamaneni
23389 Minerva Dr
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/23/2025
Right to Sue Obtained: 6/29/2025

Hareesh Gavini
12903 Lee Side Ct
Fairfax, VA 22033
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 15 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Jayakrishna Gorantla
23630 Prosperity Ridge Place
Brableton, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 12 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Lakshmana Rekha Obhilineni
42631 Dreamweaver Drive
Brambleton, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/29/2025

Lakshmi Sainathuni
22892 Emerald Chase Place
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 12 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Lavanya Chungal
12874 Williams Meadow Court
Herndon, VA 20171
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 14 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/29/2025

Lohit Lakkireddy
22804 Calderwood Lane
Ashbrun, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 12 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/30/2025

Madhusudhan Gorantla
23245 Meadowvale Glen Ct
Sterling, VA 20166
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 7/1/2025

Padma Rao Sainathuni
22892 Emerald Chase Pl
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 15 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Praveen K Buddha
3674 Carriage Hill Dr
Frederick, MD 21704
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 17 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Pushpa Konakala
24267 Quail Crossing Way
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 12 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Raghu B. Kamarouthu
25258 Lyon Terrace
South Riding, VA 20152
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Rajani Paduru
25819 Dominion Glen Way
Chantilly, VA 20152
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 15 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/29/025

Rajesh K. Putumbaka
25493 Tomey Ct
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 16 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/29/2025

Ramesh Naidu Dasyam
23956 Nightsong Court
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 11 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Ravi Midda
22678 Oatlands Grove Pl.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 8 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Ravindranath Mangalagiri
23339 Minerva Drive
Brambleton, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 7 Years
EEOC Filed: 6/26/2025
Right to Sue Obtained: 6/29/2025

Sateesh Chinta
23913 Tenbury Wells Place
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Satya Kumar Kadari
23552 Boca Field Ter
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 21 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Sreenivasulu Uppari Pashanam
25965 Royston Pass Cir.
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Srimukhi Mechineni
12419 Bennett Rd
Herndon, VA 20171
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Srinivasa Gayam
13133 Poplar Tree Rd.
Fairfax, VA 22033
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 11 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Suneel Kancharla
42615 Callalily Way
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 6 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Suresh Adusumilli
703 Moxley Dr. NE
Leesburg, VA 20176
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Suresh Paladugu
45563 Ruislip Manor Way
Sterling, VA 20166
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 22 Years
EEOC Filed: 7/1/2025
Right to Sue Obtained: 7/3/2025

Uma Karnati
43014 Park Creek Dr
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 14 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/29/2025

Umamaheswararao Nizampatnam
43069 Capri Pl
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 12 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Vani Ambati Damodaram
22648 Upperville Heights Square
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Varalakshmi Adipudi
43020 Addlestone Place
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 7 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Venkata Chinta
23376 Longollen Woods Ter
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Venkata Mallipeddi
23282 Tradewind Dr
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Venkateswarlu Gopavarapu
23740 Hopewell Manor Ter.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 9 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Vinay Gundala
23227 Wrathall Dr.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Deepthi Bolisetty
2449 Founders Way
Herndon, VA 20171
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 8 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Jithender Goli
23608 Richland Grove Dr.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 16 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/29/2025

Prasanna Kumar Penumala
23477 Epperson Sq.
Brambleton, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 6 Years
EEOC Filed: 6/23/2025
Right to Sue Obtained: 6/29/2025

Prithvider Javaji
25909 Donovan Drive
Chantilly, VA 20152
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 6 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Sampada Korumilli
22931 Waybridge Square
Broadlands, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 22 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Venkateswara Chittepu
26629 Vandview Pl
Chantilly, VA 20152
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Reston
Employed 8 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Vijay Chava
737 Bethpage Dr
McDonough, GA 30253
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 18 Years
EEOC Filed: 6/30/2025
Right to Sue Obtained: 7/3/2025

Padma Devi Korumilli
22931 Wey Bridge Sq
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 5 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Naga Himabindu Akula
23370 Longollen Woods Terr
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 9 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Geetha Chappali
41986 Mill Quarters Place
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 19 Years
EEOC Filed: 6/30/2025
Right to Sue Obtained: 6/30/2025

Sundar Kammara
8813 Minna Dr.
Henrico, VA 23229
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 7/2/2025
Right to Sue Obtained: 7/3/2025

Krishna V. Colluru
12903 Lee Side Ct
Fairfax, VA 22033
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 11 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Laxmi Nugooru
12985 Azalea Woods Way
Herndon, VA 20171
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 9 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Nirmala Battinapatla
22281 Avery Park Terr.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 11 Years
EEOC Filed: 6/27/2025
Right to Sue Obtained: 6/29/2025

Venkata Parimi
22892 North Brown Sq
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 15 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Hari Saggurthi
25391 Kinsale Pl.
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 15 Years
EEOC Filed: 6/30/2025
Right to Sue Obtained: 7/3/2025

Lavanya Chaoutacuri
25612 Royal Hunter Dr
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae – Washington D.C.
Employed 13 Years
EEOC Filed: 7/14/2025
Right to Sue Obtained: 7/18/2025

Madhava Anugu
22975 Lois Ln
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 8 Years
EEOC Filed: 7/8/2025
Right to Sue Obtained: 7/10/2025

Sanjeev K Chanda
43014 Park Creek Dr.
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Srinivasa Pendurthi
22991 Caterham Drive
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 8 Years
EEOC Filed: 7/2/2025
Right to Sue Obtained: 7/3/2025

Sudhir Gunna
41998 Mill Quarter Place
Ashburn, VA 20148
U.S. Citizen
Indian Nationality
Telugu Language
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/30/2025
Right to Sue Obtained: 6/30/2025

Prajeesh Nadooli
24614 Lenah Crossing Drive
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Over 40
Fannie Mae - Reston
Employed 18 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 7/1/2025

Sachin Behl
12701 Ox Meadow Dr.
Herndon, VA 20171
U.S. Citizen
Indian Nationality
Over 40
Fannie Mae - Reston
Employed 13 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Satish Prasanna
14226 Kings Crossing Blvd
Boyd, MD 20841
U.S. Citizen
Indian Nationality
Over 40
Fannie Mae - Reston
Employed 14 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/29/2025

Nibu Paul
7513 Hewitt Dr.
McKinney, TX 75070
U.S. Citizen
Indian Nationality
Over 40
Fannie Mae - Plano
Employed 16 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

Smruthi Purelli
41292 Lavender Breeze Cir
Aldie, VA 20105
U.S. Citizen
Indian Nationality
Telugu Language
Fannie Mae - Reston
Employed 10 Years
EEOC Filed: 6/19/2025
Right to Sue Obtained: 6/30/2025

B. The Defendant

Federal National Mortgage Association (“Fannie Mae”)
1100 15th Street NW
Midtown Center
Washington, DC 20005

Fannie Mae was first chartered by the U.S. government in 1938 to help ensure a reliable and affordable supply of mortgage funds throughout the country. Today it is a shareholder-owned company that operates under a congressional charter.

II. BASIS OF JURISDICTION

1. This action is brought for discrimination in employment pursuant to Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin) and the Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634, and in the alternative, for Breach of Contract.

III. STATEMENT OF CLAIM

2. The discriminatory conduct of which Plaintiffs complain in this action includes termination of their employment.

3. The alleged discriminatory act occurred on or around April 3, 2025.

4. Defendant discriminated against Plaintiffs based on their national origin and age.

5. In doing so, Defendant breached their employment contracts and withheld compensation owed to Plaintiffs.

IV. STATEMENT OF FACTS

6. On April 2, 2025, Plaintiffs, who were all employees of Defendant, jointly and severally received an email from Fannie Mae Human Resources (HR) directing them not to come into the office, but to instead attend a Microsoft Teams call at 10 am on April 3, 2025.

7. Plaintiffs joined the Teams call along with what they believe were at least 80 other people.

8. Plaintiffs, along with the other members of the Microsoft Teams call, were all told at the same time that they were all being terminated for cause for violating Fannie Mae's Charitable Giving program for fraud.

9. No explanation was given, to individuals or to the group, and everyone on the call was identically and simultaneously terminated immediately.

10. Plaintiffs have since learned that each person on the call was of Indian national origin. Additionally, almost everyone on the call spoke the Telugu language, which is a large ethnic population in India, and all but a handful were over the age of 40 and most over the age of 50.

11. Plaintiffs were not given, and still do not have, any indication of any violation of the Charitable Giving program.

12. In response to a request for reconsideration subsequently made by Plaintiffs, Fannie Mae said that Plaintiffs had made gifts that they knew or should have known violated their policy, or that they knew that other employees had made gifts that Plaintiffs knew or should have known violated their policy. No explanation of individual conduct was ever given to any Plaintiff.

13. All of the charities involved advocated for programs supporting Indian national, ethnic and cultural programs, and only charities advocating for supporting Indian national, ethnic and cultural programs were identified.

14. To this day, Fannie Mae has still provided no evidence to support their claims of fraud against any of Plaintiffs, jointly or severally.

V. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES

15. Plaintiffs in this matter each submitted a complaint to the Equal Employment Opportunity Commission. The dates on which each plaintiff submitted their complaints are indicated in Section I.A. *supra*.

16. The Equal Employment Opportunity Commission issued right to sue letters to each plaintiff. The dates these letters were received are also indicated in Section I.A. *supra*.

17. Since filing charges with the Equal Employment Opportunity Commission regarding the Defendant's alleged discriminatory conduct, fewer than 60 days have elapsed.

VI. BREACH OF CONTRACT

18. Paragraphs 1 through 16 inclusive are re-alleged herein.

19. Plaintiffs were all long-standing employees of Fannie Mae.

20. In cases of termination for convenience, employees of Fannie Mae are entitled under Company policy to administrative leave and to severance pay of at least two weeks per year of service, plus payout of other accrued incentives and benefits.

21. Plaintiffs were identically terminated for cause as a pretext to the unlawful termination on the basis of their Nationality, enabling for Fannie Mae to avoid these payments.

VII. RELIEF

WHEREFORE, Plaintiffs pray for judgement against the Defendant as follows:

- A.** The Defendant be ordered to compensate the Plaintiffs for lost wages and reinstatement of employment;
- B.** The Defendant be ordered to pay administrative leave and severance, including all benefits, to Plaintiffs in accordance with Fannie Mae's policies;
- C.** The Defendant be ordered to pay out accrued vacation time to Plaintiffs in accordance with Fannie Mae's policies;
- D.** The Defendant be ordered to compensate Plaintiffs for emotional suffering and humiliation;
- E.** That Defendants be ordered to pay punitive damages for these reckless and malicious acts of discrimination; or in the alternative, liquidated damages;
- F.** That judgement be entered for Plaintiffs jointly and severally against Defendant for all costs, including, but not limited to, court costs, expert fees, and attorney fees; and
- G.** That Plaintiffs be granted such other and further relief as the court deems just and proper.

VIII. JURY TRIAL

Plaintiffs demand a trial by jury for all issues so triable.

Respectfully Submitted,

/s/ Milton C. Johns

Milton C. Johns, Esq., VA Bar No. 42305

D.D.C. Attorney No. VA072

Executive Law Partners, PLLC

11130 Fairfax Blvd., Suite 303

Fairfax, Virginia 22030

mjohns@xlppllc.com

Telephone: (571) 500-1010

Fax: (571) 408-8102

Counsel for Plaintiffs