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October 5, 2015

MEMORANDUM FOR: KELLIE GREENE  
Director, Office of Victim Advocacy

FROM:

[REDACTED]  
[REDACTED]

SUBJECT: PROPOSED REMOVAL

As a disciplinary action for misconduct, I am proposing that you be removed from Peace Corps service in accordance with 22 U.S.C. 2506 and Peace Corps Manual Section 652 *Disciplinary Procedure for Foreign Service Employees*, to promote the efficiency of the service. This action is based on the following charge and specifications:

**Charge:** Misconduct

**Specification 1:** On or between March 1, 2014 and April 15, 2015, at Peace Corps headquarters, you created an offensive and negative office environment for your staff. Your actions were inappropriate.

**Background:** Over an extended period of time, on or between March 1, 2014 and April 15, 2015, you created a negative work atmosphere through bullying, harsh communications, isolation of staff, and fear of retaliation. You micromanaged your subordinate employees in OVA through frequent and demanding communications, including emails in the evening and late night hours. You inquired about routine case management actions such as whether staff contacted a victim, explained legal options to a victim, or referred victims to counseling. For example, when [REDACTED] responded to an email of this type, you escalated with a spiral of additional emails. You contradicted or disagreed with staff plans of action in group emails to staff and others outside of OVA. You took actions on cases assigned to [REDACTED] or [REDACTED] without consulting with them. Your actions contradicted prior actions by staff or had them waste time by working on actions they later found out that you had completed. You snapped your fingers in the face of staff in interactions with them to stop them from talking, interrupted them, sighed loudly, turned away from them, slammed doors, and showed unprofessional dissatisfaction with staff. This caused [REDACTED] to be nervous, insecure, and anxious, and to feel like she was walking on eggshells around you. [REDACTED] began to lose confidence and doubted her own work, despite her popularity with the agency staff who have dealt with her extensively on advocacy cases. She also cried after interactions with you.

You isolated staff by limiting staff interactions with offices outside of OVA and prevented staff participation in policy meetings. These included meetings with [REDACTED] (senior expert in the

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Peace Corps Director's office) and with the Sexual Assault Advisory Committee members, as well as meetings on IPS 3-13, MS 461 revisions, and the Kate Puzey Act lockdown.

██████████ noticed tension in the office and low morale when she started working at OVA in September 2014. She attributed the negative work atmosphere to your deficient "communication style, micromanagement and unprofessional behaviors." She reported that you ignored staff input, made last minute taskings, provided inconsistent guidance, offensively gestured with your fingers to stop discussion, spoke in a condescending tone, slammed your door, checked on routine case actions of your staff, and escalated the emails despite staff update responses, and sent emails to others on cases assigned to staff without informing staff. Your actions made her feel defeated, disempowered, undervalued, uncomfortable, frustrated, incompetent, and embarrassed. She felt anxious coming to work because she never knew what to expect from you. She also feared retaliation from you.

██████████ started working in OVA in December 2013. She learned that you had a reputation for being confrontational and for being unapproachable. She also saw firsthand that you had a "negative, demeaning, and confrontational attitude" with staff from other Peace Corps offices. She saw that you belittled ██████████ on a "regular basis," that you would "question every decision" that ██████████ and ██████████ made on their assigned cases, "take over their cases" without telling them, "repeatedly check" whether staff performed "routine daily tasks" and use a "short dismissive tone," "silent treatment," wave your finger, and slam your office door to cut off staff communication. When ██████████ disclosed the above concerns to you, your "harsh treatment of ██████████ increased tenfold."

██████████ reported that your actions "made it extremely difficult to work" with your actions "produced feelings of distrust, being undermined, incompetency and anxiety." She felt anxious each morning as she arrived at work because she did not know how you would treat her that day.

██████████, Security Specialist, also shared observations from working with you since Spring 2011. He noticed that you "demonstrated and unwillingness to negotiate or compromise and offended others," as well as intimidating others by raising your voice, "angry facial expressions, pointing a finger, or accusations." During preparation for a certain training event, he noted that you were "argumentative, unpleasant, and disrespectful with almost everyone in the group." He concluded that you seemed "unaware" that your approach was "abrasive" or that it "provoked fear and distrust." He noted that you gave the impression there you were "more interested in winning the argument than correcting" processes.

██████████ noted that "Regional Directors had so little trust in how [you] would interact with Post staff that they insisted all communications go through the Regional Directors." He observed that staff from outside OVA quit their Peace Corps employment or quit positions on working groups because of you. He reported that you were "argumentative and unpleasant" in your dealings with ██████████ on numerous occasions. ██████████ response was always professional but it caused her a great deal of distress, to the point where she was near tears on several occasions. ██████████ told him and others that "one of the primary reasons that she was leaving Peace Corps was because of her mistreatment by [you]." More than one person told him that they left [a sexual assault working group] because they did not want to interact with you on a regular basis."

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██████████ added that your staff was “always totally professional” and that they never took “any action that would undermine [your] authority or reputation.” However, he saw that they were “clearly stressed” about communicating with you, especially “delivering negative information” and “being judged for it.” Ever since you were reassigned out of OVA on or about April 27, 2015, he reports that he has been able to conduct business with OVA without the stress and negative work atmosphere described above.

██████████ ██████████, Office of Safety and Security, worked with you since you started at Peace Corps on or about May 2011. She reports that you “exhibited inappropriate behavior” and that you caused her and other employees to “cry due to [your] rude and demanding behavior.” She noted that “██████████ left her job at Peace Corps because of [you].” As for herself, ██████████ shared that she had to seek counsel from a “therapist, a conflict negotiator and a lawyer” because of your “inappropriate behavior.” After ██████████ complained to management, ██████████ told you to be more cooperative. Finally, she shares that your reassignment out of OVA, “took a big stress off [her] life” and that “morale [in her office] soared.”

**Specification 2:** On or about May 13, 2014, at Peace Corps headquarters, ██████████ spoke to you about your interactions with her and others. She also spoke about your demeanor toward her and disclosed to you that she felt she had to “walk on eggshells” around you. Following that conversation, you were curt and argumentative with ██████████, and she felt attacked and punished for the May 13, 2014 disclosures. Your actions were inappropriate.

**Background:** On or about May 13, 2014, after increasing concerns about your demeanor, ██████████ invited you to go out for ice cream and spoke to you. She told you that she respected you and that she wanted to share her feelings with you. She stated that your tendency to fight made others defensive and less willing to work with you. She suggested collaboration, building relationships, and patience. She also shared her concerns about your demeanor toward her. You apologized and said that you did not want to be that type of supervisor, yet ██████████ noted that you appeared tense and a bit offended at her disclosures.

The week following the conversation, ██████████ noted that you were more curt in conversation than usual, that you ignored her when walking by, and that you were harsh and argumentative in comments. ██████████ told you that she was feeling attacked and punished for her disclosures.

██████████ also reported that when ██████████ disclosed the above concerns to you, your “harsh treatment of Jamie increased tenfold.” On another occasion, you stated to ██████████ that OVA was like a family and that you lash out at those closest to you.

██████████ also reported a concern relating to retaliation. She noted you said “He’ll be sorry he crossed me” regarding a Country Director (CD) after you had a dispute with him. Later, she reported that you said “See I told you he would be sorry” after parents contacted Members of Congress and asked to shut down that CD’s program.

**Specification 3:** In or about March 2015, on a trip to ██████████ you made offensive comments to ██████████ and ██████████, ignored staff at other times during the trip, and slammed a door on ██████████. Your actions were inappropriate.

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**Background:** In or about March 2015, you and your staff, [REDACTED] and [REDACTED], travelled in one car on a trip to [REDACTED] for a training event. The staff invited you to join them for dinner and outside activities. One night, [REDACTED] came to your hotel room in a special effort to influence you to join the staff at dinner. You declined in a mean tone and slammed the door on her. The staff felt that you were rude and “standoffish” toward them during the entire trip.

[REDACTED] reported that you were detached from the staff during the training trip and that your actions created tension for the staff. The return trip was very uncomfortable for her. Moreover, [REDACTED] noted that you verbally attacked her for trying to help you with your bags and that it “was not the first time” you attacked her. She stated that your staff invited you to off-duty activities during the trip but that you gave them “the silent treatment.” [REDACTED] reported that there was minimal conversation during the drive back from [REDACTED] and that your attack made her feel “bullied and anxious.”

[REDACTED] noted that you escalated the mistreatment of your staff significantly after the [REDACTED] trip. As a result, the staff approached [REDACTED] and [REDACTED] for mediation.

**Specification 4:** On or about April 15, 2015, in a meeting with you, [REDACTED] and [REDACTED], your staff members [REDACTED] and [REDACTED] disclosed their concerns about the negative work environment, including your harsh communications with staff, your micromanagement, and your isolating staff from contact with other offices. Following that conversation, on April 17, 2015, you alleged that [REDACTED] was inaccurate in her attendance records. You also attacked her work performance. Your actions were inappropriate.

**Background:** On or about April 17, 2015, in a meeting with you, [REDACTED], and [REDACTED], and your staff members, near the end of the meeting, you alleged that [REDACTED] was inaccurate in her time cards and that she arrives later and that she left earlier than claimed on the attendance records. [REDACTED] and [REDACTED] stated that they arrive and depart in the same fashion as [REDACTED]. [REDACTED] also noted that you had never counselled her on the attendance allegations or noted them during prior evaluations. [REDACTED] reported that she felt that you were retaliating against her for the April 15, 2015 disclosures. She felt attacked and humiliated by your allegations and broke into tears. You came to her office after the meeting and apologized. After that date, you responded by managing one of [REDACTED]’s cases more aggressively than usual. On April 27, 2015, [REDACTED] reported your retaliation to [REDACTED]. Accordingly, you were reassigned away from OVA so that a management inquiry could be conducted of your behavior and the environment of the office.

[REDACTED] noted that your comments about [REDACTED] were the retaliation that she expected and feared from you. She specifically expressed fear of your retaliation when the staff reached out for help and mediation. She was concerned because she was still in her probationary period. She reported that you came to her after the meeting and apologized, but that your “undermining behaviors” continued after the apology. Accordingly you were reassigned pending a management inquiry. [REDACTED] noted that the work atmosphere improved when you left.

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She questioned whether you could be trusted and expressed concerns about tension if you came back.

██████████ reported that after responding to concerns during the meeting, you “seemed to turn on ██████████ and accuse her of falsifying her time card.” You then “went beyond the timesheet issue and [were] attacking ██████████ for the way she performs her daily work.” Meeting participants were “shocked” by your attack on ██████████ and stopped you and told you “how inappropriate it was.”

Despite your apologies during the meeting, ██████████ reported that your conduct was unchanged and that you “continued to create an atmosphere that was extremely stressful” for staff. Thereafter, you were temporarily reassigned. ██████████ noted that her anxiety would come back if you were to return to OVA and that she fears that she “would continue to be bullied, belittled, undervalued, and anxious every day at work.”

**Penalty Discussion**

**In proposing your removal, I have taken into consideration the nature and seriousness of your offenses, and its relation to your duties, position, and responsibilities, including whether the offense was intentional or technical or inadvertent, or was committed maliciously or for gain, or was frequently repeated.** Your actions toward your employees were disrespectful and inappropriate. Your offenses have been repeated many times. As a leader in this organization it is totally unacceptable to belittle or disrespect others rather than to collaborate and use appropriate persuasion to accomplish your assigned duties.

Your misconduct negatively impacted many of your colleagues. Moreover, your actions were unnecessary, inappropriate and unprofessional.

Your inappropriate acts creating a negative work environment have continued for an extended period of time. Thus, they have been repeated countless times. You have made the almost daily determination that you would rather manage through fear, bullying and retaliation than put forth an honest effort in the performance of your leadership duties as required by the Standards of Official Conduct. The agency has a published policy against harassment and you have been trained on these topics, as well as on prohibitions against retaliation, at supervisory training on June 10-11, 2014. These standards certainly had no effect on controlling your behavior.

Your actions created an atmosphere of fear, caused emotional distress on your staff and colleagues, as well as in the resignation of employees. Your actions were hurtful to subordinates and peers causing them to cry, seek therapy, legal counsel, and mediation. When they raised their concerns to you, the consequence was you elevating your inappropriate actions. Your retaliatory desires are evidenced in your comment “He’ll be sorry he crossed me” regarding a Country Director (CD) after you had a dispute with him. Also your “harsh treatment of ██████████ increased tenfold” after she conferred with you about your impact on staff in May 2014. Finally, when your staff met with you on April 15 and 17, 2015 and raised their concerns about the negative office environment and your inappropriate actions, you alleged timekeeping errors against an employee. This was a new topic that you had not raised with the employee in prior evaluations or with your own supervisory chain.

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I note that your offenses were often repeated. Given the clear notices that you were given regarding inappropriate acts, you ignored the guidance for your personal preferences. Thus, your offenses were not technical in nature but pure, repeated violations that caused distress and diminished office morale. Your offenses were committed for personal gain. You could have performed your leadership duties appropriately. Instead, you chose to do much if not all of this through bullying, negativity and fear. Thus, you chose to place your own private interests above those of your team and the agency.

**I have considered your job level and type of employment, including supervisory or fiduciary role, contacts with the public, and prominence of your position.** You were hired into Federal service, effective May 8, 2011, as Program Manager (Victim advocate), FP-03, and promoted to Director, Office of Victim Advocacy (Program Advisor, Victim Advocate), FP-02 at the Peace Corps. This makes you a very senior employee in the Agency. You have been trusted with the authority to lead and manage other employees. As a FP-02, you occupy a position of very high trust. You have full authority to oversee the world-wide Peace Corps victim advocacy program in over sixty countries. This means that you have been trusted with the authority, in the name of the United States, to care for victims of assault, harassment and crimes. By promoting you to such a senior position, your managers expect you to exhibit a high level of trust, honor, and integrity. This was also indicative of the Agency's belief that your judgment was sound and that they could trust you with that authority. Your actions have revealed that the Agency can no longer trust you or your judgment and ability to set the proper leadership example required and expected of a leader in this Agency.

Using your Victim Advocacy director position, you made your own staff and colleagues victims of your inappropriate actions, bullying and intimidation. The Agency has trusted you to perform your mission critical work with little review and great freedom from close supervision. You have misused the freedom that must be placed in a Director with worldwide authority. You have been paid well to perform mission critical victim advocacy. Instead you have regularly and repeatedly victimized subordinates and colleagues. You have apparently felt no qualms about improperly using your position of trust.

**I have considered your past disciplinary record.** You have worked for this Agency for over four years with no prior record of misconduct. I reviewed your performance ratings and found that your performance ratings for Fiscal Years (FY) 2013 and 2014 were at the "Meets or Exceeds" level. You were admonished in the FY 2014 performance evaluation to "focus specifically on promoting an open, communicative, environment among OVA staff members and the SARR team." You were also admonished by [REDACTED], [REDACTED] to cooperate with colleagues. It now appears that your inappropriate conduct remained unchanged.

**I have considered the effect of the offenses upon your ability to perform at a satisfactory level and its effect upon my confidence in your ability to perform assigned duties.** Your offenses have created an atmosphere negatively impacting the morale of this department. OVA employees feel they have been belittled and treated in an unprofessional manner. Your offenses and their impact on colleagues and subordinates have been amply documented. As described above, your staff and colleagues in other offices at Peace Corps do not like working for you. Your staff questions whether they can trust you if you return. When you were reassigned outside of OVA it was reported that morale "soared." Your actions caused stress and fear on

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subordinates. When staff brought their fears to your attention, you increased your misconduct “tenfold.” By your own admissions, you realized that [REDACTED] could have quit because of your inappropriate actions. The loss of trust has been described above in detail. Since you have regularly chosen to manage through inappropriate actions, bullying, fear and retaliation, your managers cannot trust you to honestly perform any function without extremely close verification that is incompatible with your job. Given the totality of the circumstances, I believe the Agency rightfully has an apprehension about your ability to perform your job.

Given the totality of the circumstances, I believe the Agency rightfully has an apprehension about your ability to perform your job in a professional manner. Your actions disrupted office morale to such an extent that it constitutes an impairment of the efficiency of the service.

**I have considered the consistency of the penalty with those imposed upon other employees for the same or similar offenses.** I have charged you with misconduct evidenced by several different episodes. There have been no cases with the same acts of misconduct. I note that the Agency has previously disciplined employees for inappropriate actions toward lower graded employees with penalties less than removal. I differentiate this case as much more serious. Your misconduct is particularly odious and reprehensible because you used your Director of Victim Advocacy position to victimize and abuse your own employees over an extended period of time causing negative impacts, to include their resignations, as well as their seeking assistance from a therapist and a lawyer. You did so despite warnings from senior management and admonishment in your performance evaluation.

**I have considered the notoriety of the offense and its impact upon the reputation of this Agency.** At this time your offenses have not become public knowledge. In the event that your misconduct were to become public, the notoriety would almost certainly be detrimental to the reputation of OVA and this Agency. However, that situation has not come to pass. Your behavior certainly brings discredit to you now and creates the potential for bringing that same discredit to OVA and the Peace Corps.

**I have considered the clarity with which you were on notice of any rules that were violated in committing the offenses, or had been warned about the conduct in question.** The Agency heavily relies upon you as a leader to act professionally in your interactions with other staff within OVA. As a leader you should also be inherently aware of the importance of using a respectful tone and demeanor when interacting with your colleagues.

In 2014, [REDACTED] put you on notice of your offensive behavior. You conceded to [REDACTED] that OVA was like a family and that you lash out at those closest to you.

You were admonished in the FY 2014 performance evaluation to “focus specifically on promoting an open, communicative, environment among OVA staff members and the SARR team.” [REDACTED] also admonished you to be cooperative in your actions.

During supervisory training of June 10-11, 2014, you were briefed on responsibilities, including preventing harassment of employees. The agency’s policy against harassment states as follows:

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“The Peace Corps is committed to maintaining high standards of conduct in the workplace and providing all employees, Volunteers, and trainees a work environment that is free from harassment.” In addition, the policy notes “Harassment will not be tolerated and will result in a thorough, prompt, and impartial investigation to resolve the claim.”

This is an extremely clear even blunt message to you and every other employee at the agency. Despite the clarity of this message it had zero affect in controlling your often repeated misconduct. I find that no amount of specific written warnings could ever deter you from your misconduct. You were clearly informed that the type of misconduct you were engaging in was inappropriate and unacceptable. Thus, I note that no Agency rule or policy prohibiting your actions had any effect whatsoever. Nor is any future published rule, policy, or procedure likely to control your behavior or to serve as a deterrent.

**I have considered the potential for your rehabilitation.** I note that you apologized to [REDACTED] in May 2014 when she disclosed her concerns to you, as well as apologizing to other staff after they disclosed their concerns to you in April 2015. Nevertheless, I also note that your “harsh treatment of [REDACTED] increased tenfold” after she conferred with you about your impact on staff in May 2014. Finally, when your staff met with you on April 15 and 17, 2015 and raised their concerns about the negative office environment and your inappropriate actions, you alleged timekeeping errors by an employee.

The subject of your potential for rehabilitation overlaps somewhat with the penalty factor of the adequacy and effectiveness of alternative sanctions. This is discussed in detail below.

**I have considered the mitigating circumstances surrounding the offense such as unusual job tensions, personality problems, mental impairment, harassment, or bad faith, malice or provocation on the part of others involved in the matter.** You were questioned about your misconduct regarding your staff during the administrative investigation. You readily admitted to some misconduct and indicated that you were remorseful for your actions.

I see no evidence that your job or the work environment led to your behavior. I note that there is no likelihood of any bad faith on the part of management or any co-worker. All of the bad faith was on your part, especially when you chose repeatedly over an extended amount of time to mistreat your staff and other agency employees. This bad faith was exacerbated when you later took actions against those who disclosed your misconduct. You were not provoked into any of this behavior. You chose the path.

**I have considered the adequacy and effectiveness of alternative sanctions to deter such conduct in the future by you or other employees.** Given the large number of aggravating factors listed above that are not offset by the mitigating factors, I feel that a sanction less than removal would have no effect in changing your behavior. The damage to the efficiency of the service has been done. Your misconduct is egregious, repeated and reprehensible. The Peace Corps and the Federal Service cannot reasonably expect that you will suddenly correct your behavior, regain the lost trust, stop the harsh treatment and victimization of your staff, become an effective leader, and never exhibit misconduct in the future. The depths of your misconduct are too deep and too fundamental to expect they will be corrected by a suspension of any length. The flaws in your character, trustworthiness and basic sensibilities have been revealed as being too deep for short- term correction.



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Assessing a penalty of less than removal for behavior as serious and as often repeated as yours will be ineffective in deterring future misconduct of other employees. This agency had assessed penalties of less than removal for harsh treatment of employees in the past. This obviously had no deterrent effect on you. Therefore I believe it will have little or no deterrent effect on other employees. The administrative disruption of dealing with your unacceptable misconduct and giving you written and oral warnings to improve your behavior are burdens that this office cannot efficiently bear. You knew all along that your unacceptable conduct was not for your lack of knowledge or ability. It was clearly due to your lack of consideration for others and lack of attention to or compliance with prohibitions against harassment and retaliation. Instead you repeatedly chose to ignore admonitions so that you could pursue your own personal desires while occupying a position of leadership. It is hard to imagine a more direct assault on the core mission of this Agency.

Given all of the penalty factor considerations above, I feel nothing less than a removal from Federal service and your position as Director, Office of Victim Advocacy, with the Peace Corps is warranted.

**REPLY RIGHTS**

You have the right to representation by an attorney or other representative of your choosing. You must indicate your choice of representative in writing to [REDACTED] at [REDACTED]. You are entitled to a reasonable amount of official time to review the material relied upon to support this action, to prepare a response, and/or to secure affidavits. Any request for official time should be directed to your immediate supervisor. You and/or your representative have the right to review materials relied upon and you may do so by contacting [REDACTED], Manager, Employee and Labor Relations, at [REDACTED] or [REDACTED].

You are permitted 14 calendar days from the date of this proposal to present an oral and/or written reply and submit affidavits in support of your answer. Requests for extension of the time limit to reply will be considered by [REDACTED] if made within the 14-day time limit to reply. If you choose to make an oral reply, please contact [REDACTED] to schedule a date and time.

You will remain in an active duty status during this time. No final decision will be made to effect this action until your reply, if provided, has been considered. You will receive a written decision after your response has been considered or as soon as possible after the expiration of the 14-day period if you do not respond.

If you are experiencing personal problems, which may have contributed to or caused these events to occur, you are urged to take advantage of the Employee Assistance Program (EAP) via LifeWorks. This is a program designed to assist employees, free of charge. You can reach LifeWorks on 888-267-8126 or at [www.lifeworks.com](http://www.lifeworks.com) ([REDACTED]).

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You are requested to sign and date this Proposed Removal as evidence that you received it. Your signature does not constitute that you agree and by signing, you will not forfeit any rights to which you are entitled. However, your failure to sign will not void the contents.

I acknowledge receipt of this Proposed Removal as indicated below:

\_\_\_\_\_  
Kellie Greene

\_\_\_\_\_  
Date