

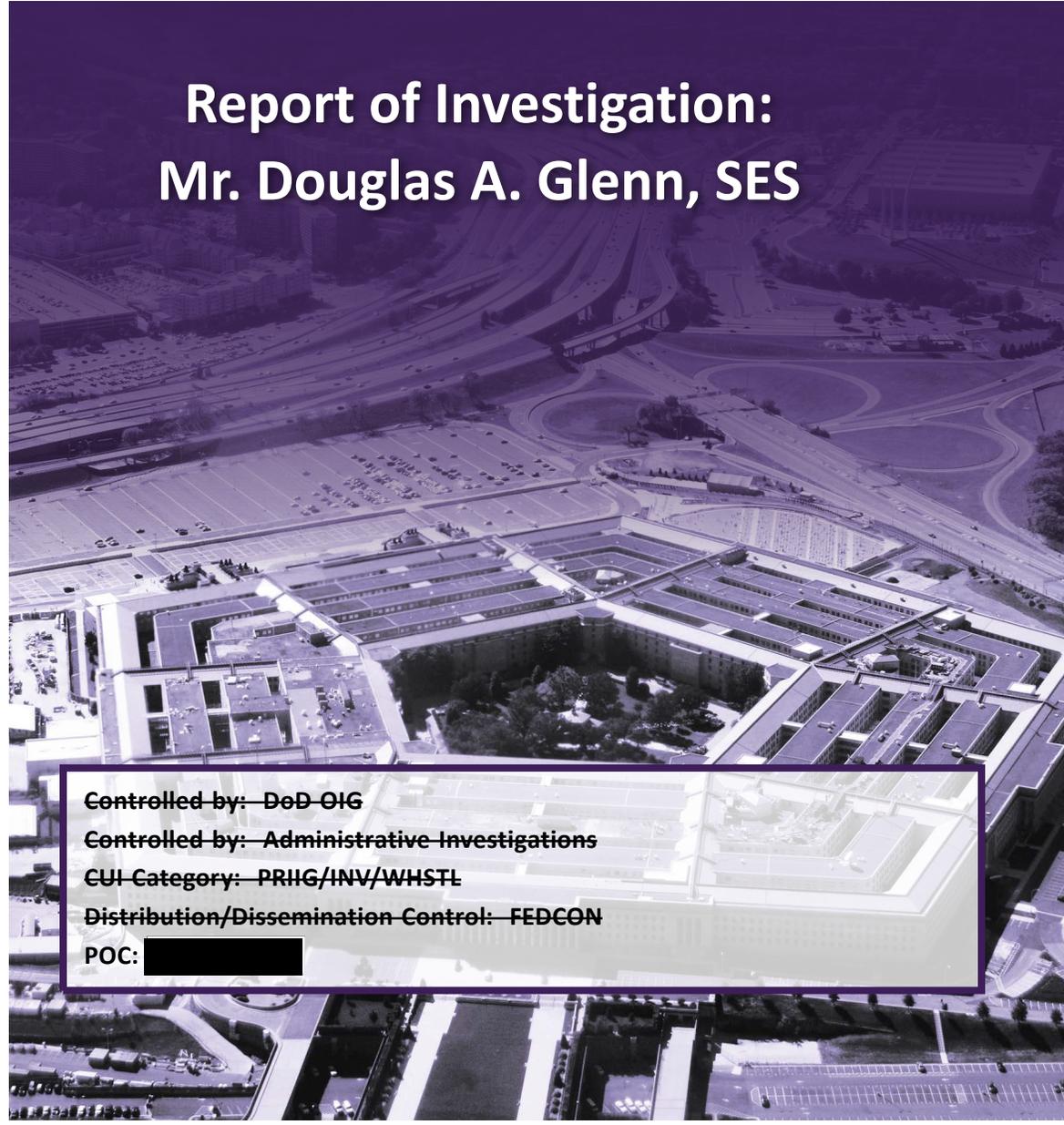
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# INSPECTOR GENERAL

*U.S. Department of Defense*

JANUARY 19, 2023



## Report of Investigation: Mr. Douglas A. Glenn, SES

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# REPORT OF INVESTIGATION: MR. DOUGLAS A. GLENN FORMER PERFORMING THE DUTIES OF THE UNDER SECRETARY OF DEFENSE (COMPTROLLER), CHIEF FINANCIAL OFFICER

## Introduction and Summary

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### Complaint Origin and Allegations

The DoD Office of General Counsel referred an anonymous complaint to the DoD Office of Inspector General (DoD OIG) on March 2, 2021, against Mr. Douglas A. Glenn, Senior Executive Service (SES), former Performing the Duties of the Under Secretary of Defense (Comptroller), Chief Financial Officer (CFO), Office of the Under Secretary of Defense (Comptroller) (OUSD[C]). In general, the complaint alleged that Mr. Glenn engaged in behaviors that were inconsistent with the expectations for leaders in the DoD.

The DoD OIG initiated an investigation on April 12, 2021, into allegations that Mr. Glenn failed to treat subordinates with dignity and respect by:

- making sexually suggestive and otherwise inappropriate comments to and in front of subordinates,
- using the N-word and making other racially insensitive comments in the workplace,
- making negative remarks about OUSD(C) staff, and
- screaming at subordinates.<sup>1</sup>

Additionally, we examined an allegation that Mr. Glenn consumed alcohol and provided alcoholic beverages to his subordinates in the Pentagon without written authorization.

We evaluated the conduct against the standards summarized throughout this report. We present the applicable standards in Appendix A.

### Scope and Methodology of the Investigation

Using the information provided in the complaint, we identified and interviewed 18 witnesses who worked at the OUSD(C), had direct interaction with Mr. Glenn, or had information relevant to the allegations. We subsequently interviewed Mr. Glenn and reviewed two statements he wrote in response to our investigation.

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<sup>1</sup> We use the term "N-word" throughout this report, except in a few instances, to highlight when the term "n\*\*\*er" was used.

Additionally, we reviewed more than 94 gigabytes of data, including more than 417,914 e-mails, and other electronic messages, personnel documents, and applicable standards.

## Conclusions

### ***Failing to Treat Subordinates with Dignity and Respect***

We concluded that Mr. Glenn engaged in an overall course of conduct that failed to treat subordinates with dignity and respect by making sexually suggestive and racially insensitive comments in the workplace, resulting in the creation of an offensive work environment for his subordinates. We considered DoD 5500.07-R, “Joint Ethics Regulation (JER),” which states ethics are “standards by which one should act based on values,” and requires DoD employees to treat others with courtesy, kindness, respect, and dignity.<sup>2</sup> We considered DoD Instruction (DoDI) 1020.04, Section 1.2.a., which states that the DoD will not condone harassment that adversely affects the work environment, erodes organizational cohesiveness, or is fundamentally at odds with the obligation to treat others with dignity and respect.<sup>3</sup> Additionally, we considered DoDI 1020.04, Section 3.1, which prohibits behavior that is offensive to a reasonable person or creates an offensive work environment.<sup>4</sup> Furthermore, we considered DoDI 1020.04, Section 3.2, which prohibits the use of racial slurs.<sup>5</sup>

We found that Mr. Glenn made sexually suggestive and otherwise inappropriate comments to and in front of subordinates, used the N-word in the workplace, and made racially insensitive comments during an all-hands town hall meeting (hereafter, referred to as all-hands meeting) attended by OUSD(C) staff.

Mr. Glenn said that he did not recall making any sexually suggestive or otherwise inappropriate comments. Mr. Glenn told us that his subordinates might have misinterpreted what he said as sexually suggestive, but his comments were “not intended that way in any way, shape, or form.” Mr. Glenn admitted that he used the N-word twice during one conversation but indicated that he did not intend to offend anyone, and it saddened him that he did not notice any discomfort in his employees resulting from his conduct.

Mr. Glenn told us that during an all-hands meeting attended telephonically by hundreds of OUSD(C) staff, he told the audience that there might be different perspectives to consider when evaluating whether former President Barack Obama experienced racism. Mr. Glenn also told us that he asked an Asian American subordinate to share her feelings during the all-hands meeting about being an Asian female in a department that considers China its biggest threat.

<sup>2</sup> DoD 5500.07-R, “Joint Ethics Regulation (JER),” August 30, 1993 (Incorporating Changes 1-7, November 17, 2011), Chapter 12, Section 4, Paragraph 12-401, “Primary Ethical Values.”

<sup>3</sup> DoDI 1020.04, Section 1.2.a., “Harassment Prevention and Responses for DoD Civilian Employees.”

<sup>4</sup> DoDI 1020.04, Section 3.1, “Harassment Adversely Affecting the Work Environment.”

<sup>5</sup> DoDI 1020.04, Section 3.2, “Prohibited Harassment Behaviors.”

Additionally, we investigated the allegation that Mr. Glenn made several public remarks about the OUSD(C) staff. Three subordinates told us that his comments were insulting, disrespectful, and implied that “DoD employees sucked.” Additionally, the three subordinates told us that Mr. Glenn’s comments overall negatively affected employee morale. Mr. Glenn acknowledged that he said the OUSD(C) created a perception of not having its financial act together. Moreover, he told us that he said the OUSD(C) needed outside talent that has experience in getting a clean audit.

Other comments Mr. Glenn made did not violate a standard, and we did not include these in reaching our substantiated conclusion on his overall course of conduct. For example, while his comments in a Federal News Network article might have been demoralizing to his staff, we concluded that Mr. Glenn’s public statements did not constitute matters of misconduct because his conduct in this particular instance did not violate a standard. However, those public statements could constitute performance matters for his supervisor to consider.

Similarly, we did not substantiate that Mr. Glenn failed to treat subordinates with dignity and respect when he raised his voice in the E-Ring hallway of the Pentagon and separately during an individual counseling session. In these instances, Mr. Glenn did not personally attack, use abusive language, or use profanity directed at these subordinates. Therefore, we concluded that his conduct in these particular instances did not violate a standard, and we did not consider them as part of the substantiated overall course of conduct. Mr. Glenn’s supervisor could review these instances as matters of performance.

### ***Consuming Alcoholic Beverages in the Pentagon Without Written Authorization***

We concluded that Mr. Glenn consumed alcohol and provided alcoholic beverages to subordinates in the Pentagon without written authorization on at least two occasions. We considered title 32 Code of Federal Regulations (CFR) section 234.11, which requires written authorization by the Washington Headquarters Services (WHS) Director for the consumption of alcoholic beverages or the possession of an open container of an alcoholic beverage within the Pentagon.<sup>6</sup> We considered title 41 CFR section 102-74.405, which requires written approval for the consumption of alcoholic beverages on Federal property.<sup>7</sup> Additionally, we considered the WHS memorandum dated July 29, 2016, that requires authorization to consume or possess an open container of an alcoholic beverage within the Pentagon.<sup>8</sup>

<sup>6</sup> 32 CFR Section 234.11, “Alcoholic Beverages and Controlled Substances.”

<sup>7</sup> 41 CFR Section 102-74.405, “Alcoholic Beverages.”

<sup>8</sup> WHS Memorandum, “Control of Alcoholic Beverages on the Pentagon Reservation and in Leased Facilities in the National Capital Region (NCR),” July 29, 2016.

Mr. Glenn told us that he consumed wine and liquor twice with others in his Pentagon office space. Mr. Glenn acknowledged that he did not have written authorization from the WHS Director to consume alcohol in the Pentagon. We found that Mr. Glenn consumed alcohol and provided alcoholic beverages to subordinates in the Pentagon without written authorization.

## Mr. Glenn's Response to Our Conclusions

We provided Mr. Glenn our tentative conclusions on September 9, 2022, for his review and comment before finalizing our report. Mr. Glenn responded on October 11, 2022, and he suggested 24 modifications to our report. We carefully considered Mr. Glenn's comments regarding our preliminary conclusions, re-examined our evidence, adjusted our report accordingly, and included his comments, in part, where appropriate in this report. See Appendix B for a more thorough examination of Mr. Glenn's response.

## Detailed Results of Our Investigation

The following sections of this report provide the detailed results of our investigation. First, we provide background information on Mr. Glenn and the OUSD(C). Second, we present the complaint and facts associated with Mr. Glenn's alleged failure to treat his subordinates with dignity and respect. Third, we discuss the alleged consumption of alcohol in the Pentagon without proper written approval and authority. Finally, we present our overall conclusions and recommendations.<sup>9</sup>

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<sup>9</sup> We based our conclusions on a preponderance of the evidence, consistent with our normal process in administrative investigations.

## Background

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### Mr. Douglas A. Glenn

Mr. Glenn first joined the OUSD(C) as the Assistant Deputy Chief Financial Officer in the office of the Deputy Chief Financial Officer (DCFO) in December 2018. He was promoted to DCFO in December 2020. From January 20, 2021, through April 12, 2021, Mr. Glenn served in the position Performing the Duties of the Under Secretary of Defense (Comptroller) (USD[C])/CFO. Mr. Glenn left the OUSD(C) on November 20, 2021, and became the Office of Personnel Management CFO.

### Under Secretary of Defense (Comptroller)

The USD(C)/CFO is the principal advisor to the Secretary of Defense for budgetary and fiscal matters, including financial management, accounting policy and systems, management control systems, budget formulation and execution, contract and audit administration, and general management improvement programs. The OUSD(C) employees consist of DoD civilians, political appointees, military members, and contractors.

## Analysis of the Allegations

### Chronology of Significant Events

The following table lists the significant events related to this investigation.

*Table. Chronology of Significant Events*

Date	Event
<b>Dec. 2018</b>	Mr. Glenn assumes duty as the Assistant DCFO.
<b>Dec. 2020</b>	Mr. Glenn is promoted to DCFO.
<b>Jan. 20, 2021</b>	Mr. Glenn begins duty as Performing the Duties of the USD(C)/CFO.
<b>Feb. 10, 2021</b>	Mr. Glenn holds an all-hands town hall meeting and allegedly makes racially insensitive comments.
<b>Feb. 23, 2021</b>	Mr. Glenn allegedly screams at two subordinates in the E-Ring hallway of the Pentagon.
<b>Feb. 26, 2021</b>	Mr. Glenn allegedly uses the N-word twice while retelling a story in front of his subordinate.
<b>Mar. 2, 2021</b>	The DoD Office of General Counsel refers a complaint to the DoD OIG.
<b>Apr. 12, 2021</b>	<ul style="list-style-type: none"> <li>The DoD OIG initiates the investigation.</li> <li>Mr. Glenn ends duty as Performing the Duties of the USD(C)/CFO and resumes duty as the DCFO.</li> </ul>
<b>Nov. 20, 2021</b>	Mr. Glenn departs the DoD and begins duty as the Office of Personnel Management CFO.

Source: The DoD OIG.

## A. Failing to Treat Subordinates with Dignity and Respect

The anonymous complaint alleged that Mr. Glenn made sexually suggestive and otherwise inappropriate comments to and in front of a subordinate, made racially insensitive comments in the workplace, and screamed at two subordinates in the E-Ring hallway of the Pentagon. Additionally, we investigated allegations that Mr. Glenn used the N-word in the workplace and made negative remarks about OUSD(C) staff.

We focused our investigation on interviewing witnesses who had direct observations of or direct interactions with Mr. Glenn regarding the allegations. Those witnesses provided us with the names of other witnesses who were identified to us as having information relevant to our investigation or who worked or interacted with Mr. Glenn.

We asked the witnesses to describe working for Mr. Glenn and how Mr. Glenn treated them and other subordinates. We asked the witnesses if Mr. Glenn made sexually suggestive and otherwise inappropriate comments to and in front of subordinates; used racial slurs in the workplace; made negative remarks about OUSD(C) staff; and screamed at subordinates in

the workplace. Additionally, we asked the witnesses about the OUSD(C)-wide all-hands town hall meeting during which Mr. Glenn allegedly made racially insensitive comments. The all-hands meeting was conducted telephonically and attended by approximately 200 subordinate employees.

## Summary of Comments About Mr. Glenn's Leadership

Of the 18 witnesses we interviewed who had consistent interactions with Mr. Glenn during his tenure at the OUSD(C), 8 described Mr. Glenn's leadership as professional, caring, approachable, straightforward, easygoing, friendly, honest, and personable. One of the eight witnesses described Mr. Glenn as a good listener and great mentor. Five of the eight witnesses told us that Mr. Glenn made sexually suggestive, racially insensitive, or otherwise inappropriate comments in the workplace, and we include their comments below in the relevant sections.

Three witnesses described Mr. Glenn's leadership using both favorable and unfavorable comments. One witness said that Mr. Glenn was laid-back but also said that he was racially insensitive. The second witness described Mr. Glenn as being friendly but also said that he lacked cultural awareness and described his behavior during the all-hands meeting as racist. The third witness described Mr. Glenn as being friendly and equitable but also said that he made lewd and off-color jokes.

The other seven witnesses viewed Mr. Glenn's leadership negatively, describing him as having a lack of self-awareness, displaying a pattern of insensitivity, using inappropriate terms in public settings, or being lackadaisical. One of the seven witnesses characterized Mr. Glenn as making crude comments. Additionally, two of the seven witnesses also characterized Mr. Glenn's behavior during the all-hands meeting as racist. We list a few examples of comments made by his subordinates below.

## Making Sexually Suggestive, Racially Insensitive, and Otherwise Inappropriate Comments in the Workplace

The anonymous complaint alleged that Mr. Glenn made sexually suggestive, racially insensitive, and otherwise inappropriate comments to and in front of subordinates. In this section, we first discuss what subordinates described to us as instances in which Mr. Glenn made sexually suggestive and otherwise inappropriate comments. We then discuss instances in which subordinates described Mr. Glenn making racially insensitive comments.

Of the 18 subordinates we interviewed, 5 provided the following examples of sexually suggestive and otherwise inappropriate comments Mr. Glenn made to and in front of subordinates.

Two subordinates told us that in 2018, Mr. Glenn used the phrase “all balls, no bush,” or words to that effect, during a conversation they had in the office. Both subordinates told us that the comment was inappropriate.

One of the two subordinates also told us that Mr. Glenn frequently commented on how young she looked, but in March 2021, Mr. Glenn added that he could line up the women in the office, and they would not look as good as her. The subordinate said that Mr. Glenn often told her, “Well, it’s not all about looking pretty.” The subordinate told us that she was offended by Mr. Glenn’s comments, and afterwards, she informed her husband and a mentor. Additionally, the subordinate told us that she did not believe he would make the comment to a male subordinate.

The third subordinate said that Mr. Glenn referred to her as a “hot blonde” during an offsite happy hour event after work. The subordinate stated that she was surprised by his comment. The subordinate later shared his comment with another employee. She told us that the comment was the only time Mr. Glenn said something to her that she considered inappropriate or even questionable.

The fourth subordinate told us that in November 2021, Mr. Glenn was talking on a speakerphone telling another subordinate that Mr. Glenn hoped some studly guy would be rubbing oil on her back at the beach.

We interviewed the fifth subordinate, who was on the call with Mr. Glenn. She told us that she could not remember the specifics of the phone conversation [REDACTED] [REDACTED] but she also told us that Mr. Glenn often made comments to her that made her feel uncomfortable.

The anonymous complaint alleged that on February 10, 2021, during an all-hands meeting, Mr. Glenn made comments that were perceived as racially insensitive. In early February 2021, while Mr. Glenn was preparing topics for the all-hands meeting, two subordinates told us that Mr. Glenn met with them and one other subordinate, asking for their input about stories he wanted to share during the all-hands meeting.

The two subordinates told us that Mr. Glenn wanted to share President Barack Obama’s comments about his experiences with racism. President Obama conducted a White House press briefing on July 19, 2013, and shared various scenarios during which he experienced racism, which included walking past people in their cars and hearing car doors locking.<sup>10</sup>

The two subordinates told us that Mr. Glenn added that President Obama possibly did not experience racism. Both subordinates told us that they advised Mr. Glenn not to share the story because it might not be received well by the staff. However, the two subordinates

<sup>10</sup> President Obama’s White House press briefing, “Remarks by the President on Trayvon Martin,” July 19, 2013, is available online at the White House archives website.

told us that Mr. Glenn did not heed their advice, and during the February 10, 2021 all-hands meeting, Mr. Glenn shared President Obama’s story and explained to the attendees that he believed it might not be racism.

Eight subordinates, including the two subordinates who met with Mr. Glenn before the all-hands meeting, confirmed that during the all-hands meeting with the staff, Mr. Glenn commented on President Obama’s speech about “hearing the locks click on the doors of cars.” They said that Mr. Glenn told the audience that the people who locked their car doors “might not have been racist” or had other reasons for locking them. Seven of the eight subordinates told us that Mr. Glenn’s comment about President Obama’s experience with racism made them and other subordinates feel appalled, surprised, betrayed, stunned, and very confused, and that it was an inappropriate and insensitive thing to say.

Additionally, the eight subordinates told us that during the same all-hands meeting, Mr. Glenn asked a subordinate of Asian descent to provide her perspective on a racially related matter. The eight subordinates provided different versions of the question but thought that Mr. Glenn asked either how she felt about the DoD’s focus on China, about her perspective on the effect of the pandemic on Chinese Americans, or about her personal experience related to racism as a Chinese American. Six of the eight subordinates told us that they believed Mr. Glenn called on the subordinate because of her ethnicity. They thought that Mr. Glenn’s question to the subordinate was insensitive, embarrassing, shocking, offensive, and awkward. They said that they felt incredulous and uncomfortable.

[REDACTED]

**Mr. Glenn’s Response to Making Sexually Suggestive, Racially Insensitive, and Otherwise Inappropriate Comments in the Workplace**

Mr. Glenn responded to the sexually sensitive comments by denying that he made the comments, saying that he did not recall making the comments, and telling us that the comments did not sound like anything he would say.

Mr. Glenn told us that during the all-hands meeting on February 10, 2021, he remembered talking about a *60 Minutes* television interview in which Secretary of Defense Lloyd Austin and General Charles Q. Brown, Chief of Staff, U.S. Air Force, shared their experiences with

racism within the DoD.<sup>11</sup> Mr. Glenn said that he told the staff he was saddened by what these two great leaders in the DoD had to endure and what that meant for the larger population of minorities within the DoD. Mr. Glenn said that he asked the staff to share their experiences as minorities or non-minorities, but he did not recall anyone responding. Mr. Glenn told us that he shared his perspectives on President Obama's comment about experiencing racism.

[T]he example I used was about how people can look at things differently. It was a comment that President Barack Obama had made. He said once, "I know what it means to be a black man walking down the street and hearing car doors lock." And there's two ways to look at that. Who are the people in the car that are locking their doors? Maybe they're racists. Maybe they're looking at a black man and assuming that there's a high potential for being robbed. Or maybe they're just following National Highway Administration guidelines to lock your doors when you drive. It could be either. I don't know, but obviously our backgrounds and experiences guide our perceptions and they're often—well, it just illustrates how things could be viewed differently and we should consider that when we evaluate and react to people knowing that they may think differently than we do, and that's okay.

When we asked Mr. Glenn about his question to a subordinate about China, he told us that he recalled asking the subordinate how she felt as an "Asian female in a Department that considers China its biggest threat." Mr. Glenn acknowledged that asking the subordinate the question was "awkward," but he wanted to provide her an opportunity to share her perspective, and he believed that he "okayed" it with her before doing so. Mr. Glenn went on to clarify his response.

I think that it would—it was relevant to the topic that unless we're Asians, unless we're walking in [subordinate's] shoes it would be very hard for us to understand what they're—they're [sic] perspective and experience of what the weight that they may be carrying as a result. And that's if it was an issue for [subordinate], I don't know if it was or not, it would be an opportunity for her to share that so that maybe we could learn from that be [sic] a little bit more empathetic down the road.

When we asked Mr. Glenn to respond to an assertion that he called on the subordinate because of her ethnicity, Mr. Glenn responded, "[A]s an Asian American she'd be the only one with a qualified opinion about what it's like being an Asian when an Asian country is the number one threat to DoD."

Mr. Glenn said that he believed the all-hands meeting went "well enough," and he did not receive any feedback from staff voicing concerns about the content of the meeting. Mr. Glenn noted in his response to our tentative conclusions that no one ever expressed concerns to him

<sup>11</sup> Mr. Glenn told us that he began the February 10, 2021 all-hands meeting by talking about the 60 Minutes interview with Secretary of Defense Austin and General Brown; however, the interview was not televised until March 21, 2021. We believe that Mr. Glenn was mistaken about this part of his testimony.

about his all-hands meeting comments. He also stated that his performance rating for that time period was “Exceeds Fully Successful,” leading him to believe that nobody complained to his supervisor about his all-hands comments.

### ***Conclusions Regarding Making Sexually Suggestive, Racially Insensitive, and Otherwise Inappropriate Comments in the Workplace***

We concluded that Mr. Glenn failed to treat subordinates with dignity and respect by making sexually suggestive, racially insensitive, and otherwise inappropriate comments to and in front of subordinates in the workplace. Because Mr. Glenn made these comments to and in front of subordinates, we determined that he violated the JER, which requires that DoD employees be treated with courtesy, kindness, dignity, and respect.

### **Using the N-Word in the Workplace**

The anonymous complaint alleged that Mr. Glenn used the N-word in front of a subordinate while sharing an experience from his past. ██████████ told us that on February 26, 2021, Mr. Glenn told ██████████ that he wanted to have another all-hands meeting to discuss diversity and inclusion. ██████████ told us that Mr. Glenn wanted to engage the staff in an open discussion. ██████████ told us that ██████████ tried to “dissuade” Mr. Glenn from doing another all-hands meeting because of how poorly the all-hands meeting on February 10, 2021, was handled. ██████████ told us that Mr. Glenn kept pushing to have another all-hands meeting, and ██████████ asked Mr. Glenn, “What are you trying to fix?”

██████████ told us that Mr. Glenn wanted to share a workplace experience from his past at the all-hands meeting. According to ██████████, Mr. Glenn complimented a former colleague on a sweater ██████████ wore, and the former colleague replied that ██████████ wore it to stop all of the negative comments. However, Mr. Glenn misheard the colleague and thought ██████████ said to stop all of the N-word comments. ██████████ said that Mr. Glenn’s colleague corrected him and said ██████████ did not say the N-word but said “negative comments” instead. ██████████ told us that Mr. Glenn said he thought the misunderstanding was funny because “when he relayed that story to a black person, the black person looks at him horrified. But when he relays that story to white friends, the white friends laugh and think it’s hilarious.” ██████████ stated that Mr. Glenn wanted to share this story during the next all-hands meeting to have an open discussion to better understand each other.

██████████ told us that ██████████ and Mr. Glenn were present during the discussion. ██████████ said that ██████████ told Mr. Glenn the story was inappropriate because Mr. Glenn used the term “n\*\*\*er,” and ██████████ was shocked.<sup>12</sup> ██████████ stated that

<sup>12</sup> In this report, we use the term “n\*\*\*er” to indicate clearly that Mr. Glenn used the term.

█ regretted not telling Mr. Glenn to never use the term “n\*\*\*er” again. Additionally, █ told us that this incident made █ lose “a little bit of respect for him [Mr. Glenn] as a leader.”

█ told us that █ informed two other subordinates (Subordinate A and Subordinate B) that Mr. Glenn used the N-word twice while telling █ about an experience from his past.

Subordinate A drafted a memorandum for record (MFR) documenting the story █ heard. Subordinate A’s MFR summarizes what █ who witnessed Mr. Glenn using the N-word told us. █ who witnessed Mr. Glenn using the N-word reviewed Subordinate A’s MFR and confirmed to us that it was accurate. Subordinate A told us that █ was alarmed, appalled, and offended that Mr. Glenn thought it was okay to use the N-word. Subordinate A told us that █ notified two of Mr. Glenn’s other subordinates to make them aware of the incident. Additionally, Subordinate A told us that █ e-mailed the two other subordinates a copy of the MFR █ drafted regarding the incident. The other two subordinates confirmed to us that they received a copy of Subordinate A’s MFR.

- One subordinate who received a copy of the MFR told us that █ was surprised that Mr. Glenn would use a racial slur in any context.
- The other subordinate who received a copy of the MFR told us that █ was appalled that Mr. Glenn used a racial slur in any context.

Subordinate B was not provided the details of what happened but was only told that Mr. Glenn used the N-word during the discussion. Subordinate B told us that █ was offended by Mr. Glenn using the N-word.

### ***Mr. Glenn’s Response on Using the N-Word***

Mr. Glenn provided a written statement on January 26, 2022, regarding his use of the N-word in the workplace. Mr. Glenn read his statement into the record during his interview. Mr. Glenn told us that in early February 2021, he was preparing topics for an upcoming all-hands meeting regarding diversity and inclusion and met with three of his subordinates to discuss the topics. Mr. Glenn told us that the three subordinates were an “ethnically diverse group, and I hoped that they would have invaluable and varying insight, advice, and perspectives.” Mr. Glenn told us that he asked the three subordinates if he could share a personal experience with them that included the use of the N-word. Mr. Glenn said that nobody objected to him using the N-word. He told us:

Specifically, I recited an occasion where I misheard a coworker. █ had stated that a rainbow-colored sweater █ was wearing helped █ with what █ called █ “negative attitude.” I unfortunately however, misheard █ and thought █ stated it helped █ with █ “n-word attitude.” I was shocked at what I thought I had heard █ say, and asked █ what █ meant by a “n-word attitude.” The coworker corrected me, clarifying that █ had in fact stated “negative

attitude.” I was completely mortified, and apologized for the misunderstanding. One of my biggest points in reciting this experience was to demonstrate how differently my friends of different races reacted when I discussed this experience with them. Specifically, I recited that I have told this story to white friends and African American friends, and get drastically different views in response. My white friends would often empathize with the horrible awkwardness I felt in this situation. They agreed it was precisely the kind of mortifying experience that often prevented them from asking race-sensitive questions at all, for fear of unintentionally offending anyone. My African American friends, to my surprise, typically didn’t understand my extreme embarrassment, my shock, they more often noted that it is a commonly used term by white people. Sadly, they told me that they didn’t see my use of the word as unusual; they thought it unfortunate, but ordinary.

When we asked Mr. Glenn to clarify what word he used when talking to his subordinates, Mr. Glenn spelled out the word “n\*\*\*er” and confirmed that he used the term “n\*\*\*er” when talking to his subordinates. Mr. Glenn said that he shared this experience with his subordinates to highlight the different reactions he received and to explain why it is difficult to discuss race. Mr. Glenn told us that he watched each subordinate’s reactions as he told the story, and he did not believe anyone was offended. He said that a “very productive conversation ensued between us all.” Mr. Glenn told us that he did not intend to offend anyone, and he would have “stopped immediately and apologized” if anyone was offended. Mr. Glenn told us that all three of the subordinates recommended that he not share the story during the all-hands meeting. Additionally, Mr. Glenn told us that he did not tell the story or use the N-word in the all-hands meeting. We interviewed all three subordinates, and [REDACTED] recalled this conversation with Mr. Glenn; we included that information above. [REDACTED], who Mr. Glenn believed were present when he related his story, told us that [REDACTED] did not witness or hear Mr. Glenn use any racial slurs.

Mr. Glenn asserted in his response to our tentative conclusions that the draft report did not provide the context of his or witnesses’ perspectives regarding his use of the N-word. Mr. Glenn also asserted that he did not use the term in a disrespectful manner. We carefully considered Mr. Glenn’s statement about not intending to offend anyone when he used the term. However, we found that Mr. Glenn’s use of the N-word and the resulting impact on his subordinates and the offense they took from it outweighed any intentions he believed he had when he used the term.

### ***Conclusions on the Use of the N-Word in the Workplace***

We concluded that Mr. Glenn failed to treat subordinates with dignity and respect by using the N-word in the workplace. Mr. Glenn’s use of the N-word in the workplace, even for illustrative purposes, offended several OUSD(C) staff members. Multiple subordinates we interviewed

shared their negative reactions when they heard about Mr. Glenn's use of the N-word. One subordinate told us that [REDACTED] drafted an MFR and wrote [REDACTED] was alarmed, appalled, and offended that Mr. Glenn thought it was okay to use the N-word.

We determined that his use of the N-word in the workplace violated the ethical conduct standards as outlined in DoD Instruction (DoDI) 1020.04, Section 1.2.a, because it eroded organizational cohesiveness and is fundamentally at odds with the expectation that DoD civilian employees treat others with dignity and respect. Additionally, even taking into consideration Mr. Glenn's account of his rationale, the use of a racial slur in the workplace in front of a subordinate and the resulting negative reactions by other subordinates violated DoDI 1020.04, Sections 3.1 and 3.2, which prohibit creating an offensive work environment and using racial slurs.

## Making Negative Remarks About OUSD(C) Staff

We investigated allegations that while Mr. Glenn was the Assistant Deputy Chief Financial Officer, he made negative comments about OUSD(C) staff that were documented in a Federal News Network article, "Pentagon's Longstanding Audit Failures Also Pose a Recruiting Challenge," July 27, 2020. The article cited Mr. Glenn as saying:

We've created this perception about not having our financial act together over years. When other agencies have reached out to DoD to say, "Hey, what are your intergovernmental balances? We need to reconcile with you, here's all our transactions, what are yours?" DoD comes back with, "We don't know. Tell us what our numbers should be, and we'll just book that."

Additionally, the article quoted Mr. Glenn as saying:

We need outside talent who have seen clean opinions, who know how to converse with auditors about the five assertions. When auditors come in and ask for a report, we need folks who are smart enough to say, "No, you don't want that report, you want this report, because this tells you how we can make our assertion and whether our controls are working."

Three subordinates told us that his comments were insulting, disrespectful, implied that "DoD employees sucked," and overall negatively affected employee morale. One of the subordinates told us that [REDACTED] voiced concerns to Mr. Glenn about how his comments negatively affected the staff, and [REDACTED] said that he thanked [REDACTED] for the feedback. The second and third subordinates told us that Mr. Glenn addressed the staff's concerns during a DCFO all-hands meeting. Additionally, the second and third subordinates recalled that Mr. Glenn stood by his comments and did not apologize for the effect of his comments on the staff.

## ***Mr. Glenn's Response on the Negative Remarks***

Mr. Glenn acknowledged making the comments during presentations that he provided during 2019 and 2020. Mr. Glenn told us that his comments were “not popular,” and DoD staff did not like to hear them, but they were “true.” Mr. Glenn said that he believed the DoD “would greatly benefit from outside financial talent” who had experience in obtaining a clean audit opinion. Mr. Glenn said that he received feedback from his subordinates ranging from understanding what he meant to feelings of disrespect by his comments. Mr. Glenn told us that he did not recall any specific concerns or the response he provided, but he recalled that he apologized and explained it was not his intent to disrespect them.

## ***Conclusions Regarding Negative Remarks About OUSD(C) Staff***

While his public comments might have been demoralizing to the OUSD(C) staff, we concluded that Mr. Glenn's public statements could constitute matters of performance for consideration by his supervisor but did not constitute matters of misconduct or failure to treat employees with dignity and respect. Therefore, we did not consider Mr. Glenn's remarks in the overall conclusion that he failed to treat subordinates with dignity and respect because his conduct in these particular instances did not violate a standard.

## **Screaming at Subordinates in the E-Ring Hallway**

The anonymous complaint alleged that Mr. Glenn screamed at two of his subordinates in the E-Ring hallway of the Pentagon. The two subordinates told us that they previously scheduled a meeting for February 23, 2021, at 10:00 a.m. to address a parts accounting issue with the Joint Strike Fighter (JSF) program. The two subordinates told us that they received an e-mail from the Special Assistant to the Deputy Secretary of Defense on February 23, 2021, at 8:59 a.m. This e-mail invited them to attend the Deputy Secretary of Defense's Management Action Group (DMAG, formerly known as the Defense Senior Leadership Conference) Intelligence Briefing meeting at 9:30 a.m. that day.<sup>13</sup> The first subordinate told us that it was rare to receive an invitation to the DMAG meetings. Since the subordinates prepared talking points for the Deputy Secretary of Defense to present during the meeting, they wanted to hear how she addressed the talking points.

The first subordinate told us that they tasked their administrative staff to cancel the JSF meeting and reschedule it for either later that day or the next day. Mr. Glenn e-mailed the two subordinates on February 23, 2021, at 9:07 a.m., advising them that he was aware they canceled the JSF meeting because of the invite to the DMAG meeting, but he still wanted the JSF meeting to occur as originally scheduled.

<sup>13</sup> According to DoD Directive 5105.79, “DoD Senior Governance Councils,” May 19, 2008, “the Secretary of Defense chairs meetings of the Defense Senior Leadership Conference and is assisted by the Chairman of the Joint Chiefs of Staff.” The Conference is one of the principal integrated civilian-military governance bodies of the DoD.

The two subordinates told us that as they were walking towards the DMAG meeting, Mr. Glenn, who was behind them, yelled out to them asking if they read his e-mail. The two subordinates told us that they looked back and responded to Mr. Glenn that they had not read his e-mail and asked what was in the e-mail. The first subordinate told us that Mr. Glenn stopped and yelled, “[N]o, you’re having that meeting at 10:00 a.m.” The two subordinates told us that they explained to Mr. Glenn that they rescheduled the meeting, but Mr. Glenn was yelling and telling them that one of them would attend the DMAG meeting while the other attended the previously scheduled JSF meeting.

The first subordinate described Mr. Glenn’s demeanor as “visibly angry” and his tone as “extremely loud.” This subordinate said that ■■■ told Mr. Glenn and the second subordinate that ■■■ would go to the previously scheduled JSF meeting because Mr. Glenn was loud and ■■■ needed him to stop. The second subordinate told us that ■■■ felt embarrassed by Mr. Glenn yelling at them in the E-Ring hallway because other people in the hallway witnessed the incident. The first subordinate gave us a copy of an MFR that ■■■ drafted the same day of the incident, documenting the events that took place. ■■■ told us that ■■■ drafted the MFR because ■■■ had never been treated so disrespectfully or yelled at in public or private in ■■■ 30-year career. Both subordinates told us that two of Mr. Glenn’s other subordinates witnessed the incident.

The first witness to the incident told us that ■■■ and Mr. Glenn were headed to the DMAG meeting when they saw the two subordinates walking ahead of them towards the same DMAG meeting. The witness said that Mr. Glenn called out to the two subordinates, repeatedly asking if they read his e-mail. The witness told us that Mr. Glenn continued trying to get their attention when he raised his voice, but not screaming, and asked them to “please stop.” The witness said that the two subordinates stopped walking and were talking to Mr. Glenn about the issue, but ■■■ did not hear the rest of the conversation because ■■■ gave them space to have their discussion.

The second witness to the incident told us that ■■■ did not hear the conversation between Mr. Glenn and the two subordinates because ■■■ slowed ■■■ pace as ■■■ approached them in the E-Ring hallway. The witness said that Mr. Glenn “seemed aggravated with something that had happened and was expressing that displeasure in making his point to two individuals.” Additionally, the witness told us that ■■■ believed Mr. Glenn was “extremely frustrated” and “perturbed” by something and “he lost his cool.”

## ***Mr. Glenn's Response to the Allegation About the E-Ring Hallway Incident***

Mr. Glenn told us that the Office of the Deputy Chief Financial Officer staff on numerous occasions tried to meet with the two subordinates to address the material weaknesses related to the JSF parts and equipment; however, the two subordinates either canceled or did not attend the meetings. Mr. Glenn said that the "resolution of this issue was critical to achieving a clean audit opinion for the Department."

Mr. Glenn told us that a subordinate notified him the morning of February 23, 2021, that the JSF meeting was canceled. Mr. Glenn told us that he e-mailed the two subordinates, requesting that one of them attend the DMAG meeting and the other attend the JSF meeting. Mr. Glenn said that as he was walking towards the DMAG meeting, he noticed the two subordinates walking ahead of him, and he asked them if they saw his e-mail requesting that one of them go to the JSF meeting. Mr. Glenn told us that both subordinates kept walking and responded that the meeting was canceled. Mr. Glenn said that he "corrected them that no, the meeting wasn't canceled and there was no need for two ... [REDACTED] in the Deputy Secretary meeting." Mr. Glenn said that the two subordinates continued walking towards the DMAG meeting, and he felt that their actions were disrespectful; therefore, he used a commanding, but respectful, tone asking them to stop.

Mr. Glenn acknowledged that he used an elevated volume to get the subordinates' attention because he needed to send a message that he was asking them to stop; therefore, he "added volume" to his voice. When we asked Mr. Glenn if the situation could have been handled differently, he said that he was not sure it should have been handled differently.

## ***Conclusions Regarding Screaming at Subordinates in the E-Ring Hallway***

We did not substantiate that Mr. Glenn failed to treat the two subordinates with dignity and respect when he raised his voice in the E-Ring hallway of the Pentagon. The evidence indicated that Mr. Glenn used an elevated tone during these discussions; however, he did not personally attack, use abusive language, or use profanity towards these subordinates. Therefore, we concluded his conduct in this particular instance did not violate a standard, and we did not consider them as part of the substantiated overall course of conduct. Mr. Glenn's supervisor could review these as performance matters to consider.

## ***Screaming Incident with Another Subordinate***

We investigated an allegation that Mr. Glenn screamed at another subordinate before March 2020. The subordinate told us that Mr. Glenn called and screamed at [REDACTED] because he received a complaint about [REDACTED] from another senior official. The subordinate told us that [REDACTED] felt like a child while Mr. Glenn screamed at [REDACTED]. The subordinate told us that Mr. Glenn

received a complaint from a senior official who said that the subordinate was rude during a staff conference call. The subordinate said that Mr. Glenn told ██████ was rude and unprofessional, and he said, ██████. The subordinate stated that ██████ and Mr. Glenn did not have a personal relationship outside of work, so it was “shocking that he called and just started going off about this incident.” However, the subordinate told us that ██████ was not offended by Mr. Glenn screaming at ██████ and “he’s probably the best SES you can have.”

### ***Mr. Glenn’s Response to the Screaming Incident***

Mr. Glenn told us that he never yelled or screamed at any subordinates during discussions regarding performance or conduct issues. Mr. Glenn told us that it “would only inflame the situation.”

### ***Conclusions Regarding Screaming Incident with Another Subordinate***

We did not substantiate that Mr. Glenn failed to treat the subordinate with dignity and respect when he raised his voice during an individual counseling session. The evidence indicated that Mr. Glenn used an elevated tone during the discussion; however, he did not personally attack, use abusive language, or use profanity towards the subordinate. Therefore, we concluded that his conduct in this particular instance did not violate a standard, and we did not consider it as part of the substantiated overall course of conduct.

## **Conclusions on Failing to Treat Subordinates with Dignity and Respect**

We reviewed the JER, which requires that DoD employees be treated with courtesy, kindness, dignity, and respect. We reviewed DoDI 1020.04, Section 1.2.a, which states that the DoD will not condone harassment that adversely affects the work environment. Additionally, we reviewed DoDI 1020.04, Sections 3.1 and 3.2, which prohibit creating an offensive work environment and using racial slurs.

We concluded that Mr. Glenn engaged in an overall course of conduct that failed to treat subordinates with dignity and respect when he made sexually suggestive and racially insensitive comments in the workplace. For example, Mr. Glenn made sexually suggestive comments, including “all balls, no bush,” and made inappropriate comments, such as calling a subordinate a “hot blonde” or telling another subordinate, “Well, it’s not all about looking pretty.” His employees also had negative reactions to what they interpreted as racially insensitive comments from Mr. Glenn during the all-hands meeting with hundreds of OUSD(C) staff in attendance. Additionally, several witnesses told us about, and Mr. Glenn confirmed to us, that he used the N-word on one occasion.

Other comments Mr. Glenn made did not violate a standard, and we did not include these in reaching our substantiated conclusion on his overall course of conduct. For example, his comments in the Federal News Network article might have demoralized his staff. We concluded that Mr. Glenn's public statements could constitute performance matters for his supervisor to consider. However, they did not constitute matters of misconduct because his conduct in this particular instance did not violate a standard, and we did not include them as part of the substantiated overall course of conduct.

Similarly, we did not substantiate that Mr. Glenn's raised voice at subordinates in the E-Ring hallway of the Pentagon or separately during an individual counseling session constituted failures to treat employees with dignity and respect. In these instances, Mr. Glenn did not personally attack, use abusive language, or use profanity directed at these subordinates. Therefore, we concluded his conduct in these particular instances did not violate a standard, and we did not include them in the substantiated overall course of conduct. However, Mr. Glenn's supervisor could consider these matters in a review of Mr. Glenn's performance.

## **Mr. Glenn's Response to Our Conclusions Regarding Failing to Treat Subordinates with Dignity and Respect**

As described previously in this report, Mr. Glenn disagreed with several of our conclusions regarding his failure to treat subordinates with dignity and respect. Where applicable, we modified our report. However, we stand by our conclusions that Mr. Glenn demonstrated a lack of dignity and respect by making sexually suggestive and racially insensitive comments in front of his subordinates.

## **B. Consuming Alcohol and Providing Alcoholic Beverages to Subordinates in the Pentagon Without Written Authorization**

### **Allegations About Consuming and Providing Alcohol**

Additionally, we investigated allegations that Mr. Glenn consumed alcohol and provided alcoholic beverages to his subordinates in the Pentagon without written authorization. Four subordinates told us that Mr. Glenn possessed and consumed alcohol in his office in the Pentagon. The first subordinate told us that Mr. Glenn offered subordinates "wine in the office space in the afternoon." The second subordinate told us that Mr. Glenn kept alcohol in his office refrigerator, and he offered her and two other subordinates alcohol during duty hours. The second subordinate confirmed that Mr. Glenn drank alcohol with them. The third subordinate confirmed that Mr. Glenn offered him and possibly two other

front office subordinates craft beers once or twice, but it was “well after business hours.” The fourth subordinate told us that Mr. Glenn had a pink bottle of wine sitting behind his desk, and he offered her some of the wine after a conference call that ended around 2:00 p.m.

We found no evidence that Mr. Glenn had authorization to store or consume alcohol at the Pentagon.

## **Mr. Glenn’s Response About Consuming and Providing Alcohol**

Mr. Glenn told us that he had a four-pack of travel-size (8 ounces) wine and about six “airplane-size” liquor bottles in the mini-refrigerator in his office. He told us that he received the alcohol as Christmas gifts from colleagues in December 2020.

Mr. Glenn denied offering subordinates alcoholic beverages. He told us that “someone saw them on my desk and asked if I was going to drink them and I said yeah. They were welcome to join me. So if I need to call that serving, okay, I guess I did, but that’s how that transpired. It wasn’t me approaching them, ‘Hey, do you want a drink?’”

Mr. Glenn admitted drinking wine and liquor in the Pentagon after working hours on two occasions from January 2021 through February 2021. He said that the first occasion was with a smaller group of people, and the second occasion was with a larger group of people, but he did not recall how many people were present or who those individuals were. Mr. Glenn said that during the first occasion, he drank Jack Daniels and Diet Coke, and he had no more than two drinks. He said that he did not recall who was present, but he believed that those present were peers or members of the SES who “may or may not have been in my organization.” Mr. Glenn told us that the second occasion was with a larger group of approximately three other people, which included a member of his staff, and that together they finished the rest of the alcoholic beverages he had in his office. Mr. Glenn did not recall the names of those present during the second occasion.

Mr. Glenn told us that he never obtained written authorization to consume alcoholic beverages in the Pentagon, but he heard that it “was not uncommon to drink alcohol in your office after hours.” Mr. Glenn told us that he became aware of the requirement to obtain written permission in February 2021, when he was drinking alcohol with the larger group, and someone mentioned that he needed authorization. Mr. Glenn told us that he stopped drinking in his office after he was notified that he needed authorization.

## **Conclusions on Consuming Alcohol and Providing Alcoholic Beverages to Subordinates in the Pentagon Without Authorization**

We reviewed 32 CFR section 234.11, 41 CFR section 102-74.405, and the WHS memorandum dated July 29, 2016, which outline the process to gain written approval to consume or possess alcohol in the Pentagon. Mr. Glenn acknowledged that he did not have written authorization to consume or possess alcohol in the Pentagon. The evidence indicates that he consumed alcohol and provided alcoholic beverages to his subordinates without written authorization. Lack of knowledge about the regulations concerning alcohol in Federal buildings is not a valid excuse, and, in any case, we found it hard to accept that someone at Mr. Glenn's level would not know of the restrictions against drinking alcohol in locations such as the Pentagon. Therefore, we concluded that Mr. Glenn consumed alcohol and provided alcoholic beverages to subordinates in the Pentagon without written authorization.

## **Mr. Glenn's Response to Our Conclusions Regarding Consuming Alcohol and Providing Alcoholic Beverages to Subordinates in the Pentagon Without Authorization**

In his response to our tentative conclusions, Mr. Glenn agreed that he consumed alcohol in the Pentagon on two occasions. However, he disagreed that he consumed alcohol on more than two occasions.

After considering Mr. Glenn's response to our preliminary conclusions and re-examining our evidence, we stand by our conclusion that Mr. Glenn acknowledged consuming alcohol in the Pentagon on two occasions. We also stand by our conclusion that he did so without the required written authorization.

## Overall Conclusions

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We substantiated the allegation that Mr. Glenn engaged in an overall course of conduct that failed to treat subordinates with dignity and respect and created an offensive work environment for his subordinates by:

- making sexually suggestive, racially insensitive, and otherwise inappropriate comments to and in front of subordinates, and
- using the N-word in the workplace.

Additionally, we substantiated the allegation that Mr. Glenn consumed alcohol and provided alcoholic beverages to his subordinates in the Pentagon on at least two occasions without authorization.

## Recommendations

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Mr. Glenn transferred to a new position in the U.S. Office of Personnel Management. Accordingly, we will forward our report to the Director of the U.S. Office of Personnel Management to take appropriate action regarding Mr. Glenn.

Additionally, we will forward our report to the WHS Director for inclusion in Mr. Glenn's personnel file.

## Appendix A. Standards

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### DoD 5500.07-R, “Joint Ethics Regulation (JER),” August 30, 1993 (Incorporating Changes 1-7, November 17, 2011)

The JER provides a single source of standards of ethical conduct and ethics guidance for DoD employees.

#### ***JER Chapter 12, “Ethical Conduct”***

Section 4, “Ethical Values,” paragraph 12-400, states that ethics are “standards by which one should act based on values. Values are core beliefs such as duty, honor, and integrity that motivate attitudes and actions. ... Ethical values relate to what is right and wrong and thus take precedence over non-ethical values when making ethical decisions. DoD employees should carefully consider ethical values when making decisions as part of official duties.”

Paragraph 12-401, “Primary Ethical Values,” elaborates on those characteristics as follows.

- d. Accountability.** DoD employees are required to accept responsibility for their decisions and the resulting consequences. This includes avoiding even the appearance of impropriety because appearances affect public confidence. Accountability promotes careful, well thought-out decision-making and limits thoughtless action.
- e. Fairness.** Open-mindedness and impartiality are important aspects of fairness. DoD employees must be committed to justice in the performance of their official duties. Decisions must not be arbitrary, capricious, or biased. Individuals must be treated equally and with tolerance.
- f. Caring.** Compassion is an essential element of good government. Courtesy and kindness, both to those we serve and to those we work with, help to ensure that individuals are not treated solely as a means to an end. Caring for others is the counterbalance against the temptation to pursue the mission at any cost.
- g. Respect.** To treat people with dignity, to honor privacy and to allow self-determination are critical in a government of diverse people. Lack of respect leads to a breakdown of loyalty and honesty within a government and brings chaos to the international community.

## **DoD Instruction 1020.04, “Harassment Prevention and Responses for DoD Civilian Employees,” June 30, 2020**

DoDI 1020.04, Section 1.2.a, states the DoD will “[n]ot tolerate or condone harassment, to include harassment that is not unlawful but adversely affects the work environment. Harassment jeopardizes combat readiness and mission accomplishment, weakens trust, and erodes organizational cohesion. Harassment is fundamentally at odds with the obligations of Service members and DoD civilian employees to treat others with dignity and respect.”

### ***Section 3, “Prohibited Harassment”***

#### ***Section 3.1, “Harassment Adversely Affecting the Work Environment”***

The conduct prohibited by this policy includes, but is broader than, the legal definitions of harassment and sexual harassment. Behavior that is unwelcome or offensive to a reasonable person and that interferes with work performance or creates an intimidating, hostile, or offensive work environment is prohibited. All allegations of harassment must be evaluated under the totality of the circumstances, to include an assessment of the nature of the conduct and the context in which the conduct occurred. In some circumstances, a single incident of harassing behavior is prohibited harassment whereas, in other circumstances, repeated or recurring harassing behavior may be required to constitute prohibited harassment.

#### ***Section 3.2, “Prohibited Harassment Behaviors”***

- a. Harassing behavior may include:
  1. Unwanted physical contact.
  2. Offensive jokes.
  3. Epithets or name-calling.
  4. Ridicule or mockery.
  5. Insults or put-downs.
  6. Displays of offensive objects or imagery.
  7. Offensive non-verbal gestures. Stereotyping.
  8. Intimidating acts.
  9. Veiled threats of violence.
  10. Threatening or provoking remarks.
  11. Racial or other slurs.
  12. Derogatory remarks about a person’s accent or disability.
  13. Displays of racially offensive symbols. Hazing. Bullying.

- b. Unlawful harassing conduct may include:
  1. Unlawful discriminatory harassment.
  2. Sexual harassment. Stalking.

### ***Section 3.3, “Means of Harassment”***

Harassment can be oral, visual, written, physical, or electronic. Harassment can occur through electronic communications, including social media, other forms of communication, and in person.

### ***Section 3.4, “Behavior that is Not Harassment”***

Activities or actions undertaken for a proper military or governmental purpose, such as combat survival training, assignment of work related to the duties and responsibilities of the employee, and performance counseling, are not harassing behaviors. Moreover, this policy prohibiting harassment is not a “general civility code.” Behavior that is rude, ignorant, abrasive, or unkind, but does not adversely affect the work environment as described in Paragraph 3.1, is not harassment.

## **32 CFR Section 234, “Conduct on the Pentagon Reservation”**

32 CFR section 234 provides the standards of conduct in the Pentagon.

### ***Section 234.11, “Alcoholic Beverages and Controlled Substances”***

- a. Alcoholic beverages. The consumption of alcoholic beverages or the possession of an open container of an alcoholic beverage within the Pentagon Reservation is prohibited unless authorized by the Director, WHS, or his designee, the Installation Commander, or the Heads of the Military Departments, or their designees. Written notice of such authorizations must be provided to the Pentagon Force Protection Agency.
- b. Presence on the Pentagon Reservation when under the influence of alcohol, a drug, a controlled substance, or any combination thereof, to a degree that may endanger oneself or another person, or damage property, is prohibited.

## **41 CFR Section 102-74.405, “Alcoholic Beverages”**

41 CFR section 102-74.405 states that “[e]xcept where the head of the responsible agency or his or her designee has granted an exemption in writing for the appropriate official use of alcoholic beverages, all persons entering in or on Federal property are prohibited from being under the influence or using alcoholic beverages. The head of the responsible agency or his or her designee must provide a copy of all exemptions granted to the buildings manager and the highest ranking representative of the law enforcement organization, or other authorized officials, responsible for the security of the property.”

## **WHS Memorandum, “Control of Alcoholic Beverages on the Pentagon Reservation and in Leased Facilities in the National Capital Region (NCR),” July 29, 2016**

On July 29, 2016, the WHS Director issued a memorandum to DoD personnel titled, “Control of Alcoholic Beverages on the Pentagon Reservation and in Leased Facilities in the National Capital Region (NCR).” The memorandum states that pursuant to 32 CFR sec. 234.11, “[t]he consumption of alcoholic beverages or the possession of an open container of an alcoholic beverage is prohibited within the Pentagon Reservation” unless properly authorized.

In the memorandum, the Director delegates the “authority to grant exemptions for the consumption of alcoholic beverages in assigned office space on the Pentagon Reservation and WHS-leased space in the NCR” to specified individuals or entities.

## Appendix B. Mr. Glenn's TCL Response

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Mr. Glenn responded to our tentative conclusions on October 11, 2022, and he suggested 24 modifications to our report. We discuss several of the suggested modifications below.

### Concurrence with Mr. Glenn's Suggestions

Of Mr. Glenn's 24 suggested changes to our report, we agreed with 12 suggestions and modified our report accordingly. We made five noteworthy changes that we explain below.

Mr. Glenn clarified that he used the N-word in one discussion. We concurred in part that Mr. Glenn used the N-word in one discussion. We modified the report to clarify that he used the N-word twice during the discussion.

Mr. Glenn disagreed with our tentative conclusion that, during the all-hands meeting, he told the OUSD(C) staff that President Barack Obama did not experience racism. We evaluated the evidence and included Mr. Glenn's explanation in our report. Mr. Glenn told us that he intended to state at the meeting that there might be different perspectives to consider when evaluating whether former President Obama experienced racism.

Mr. Glenn admitted consuming alcohol with subordinates on two occasions in the Pentagon. We received testimony from multiple witnesses that Mr. Glenn consumed and provided alcohol to subordinates in the Pentagon. We amended the introduction and summary to reflect Mr. Glenn's acknowledgment that he consumed alcohol on two occasions.

Mr. Glenn disagreed with us including the specific allegation that he made a comment to a subordinate that "he could line women up and they would not look as good as her" in the Chronology of Significant Events table in Section III. Mr. Glenn denied that he made the comment and indicated that there were no other witnesses who heard him make the comment. We determined that it was not necessary to include the comment in the Chronology and removed it from the table. However, we substantiated that Mr. Glenn made this comment. This comment was consistent with Mr. Glenn's overall course of conduct toward his subordinates.

Finally, Mr. Glenn denied screaming at subordinates in the E-Ring hallway of the Pentagon and separately during an individual counseling session. Mr. Glenn requested that we add that he "allegedly" screamed at subordinates. To address Mr. Glenn's concern, we reworded the sentences to clarify our findings.

### Non-Concurrence with Mr. Glenn's Suggested Changes

Mr. Glenn asserted in his response to our tentative conclusions that the draft report did not provide the context of his or witnesses' perspectives regarding his use of the N-word. Mr. Glenn also asserted that he did not use the term in a disrespectful manner. We carefully

considered Mr. Glenn's statement about not intending to offend anyone when he used the term. However, we found that Mr. Glenn's use of the N-word and the resulting impact on his subordinates and the offense they took from it outweighed any intentions he believed he had when he used the term, and we have written the report to fully and fairly describe the circumstances as perceived by all witnesses.

Regarding Mr. Glenn's use of the N-word, he asserted that he used the N-word on February 10, 2021, during a meeting with three of his subordinates. We found no information to support his assertion that he used the N-word in a meeting with these three subordinates. We determined that Mr. Glenn used the N-word in a meeting with [REDACTED] present [REDACTED] and Mr. Glenn were present during the discussion when Mr. Glenn used the N-word twice while retelling a story from his past.

Mr. Glenn asserted that our report fails to recognize that he asked the subordinate, before the all-hands meeting, for permission to call on the subordinate to discuss Asian matters at the meeting. We addressed this in our report, but we redacted the paragraph to protect witness confidentiality. [REDACTED]  
[REDACTED]  
[REDACTED]

In another instance, Mr. Glenn requested a modification that would change a subordinate's recollection and perception of an event. We reject Mr. Glenn's request to change witness testimony or perception of an event.

Mr. Glenn requested that we remove the references to subordinates' reactions to hearing the story of his use of the N-word. Mr. Glenn requested that we either state how many people we determined were told the story or clearly note that these individuals were not in the room when he used the N-word. We did not concur with Mr. Glenn's request to remove the summary of the retelling of the incident to others and his subordinates' reactions. Their testimony provides evidence of the impact Mr. Glenn's use of the N-word had on the original subordinate and the additional subordinates who later heard of it. We revised our presentation of facts to more clearly indicate that the additional subordinates heard about Mr. Glenn's use of this word from the original subordinate and were not present when he used the N-word.

## Acronyms and Abbreviations

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<b>CFO</b>	Chief Financial Officer
<b>CFR</b>	Code of Federal Regulations
<b>DCFO</b>	Deputy Chief Financial Officer
<b>DMAG</b>	Deputy's Management Action Group
<b>DoD OIG</b>	DoD Office of Inspector General
<b>DoDI</b>	DoD Instruction
<b>JER</b>	Joint Ethics Regulation
<b>JSF</b>	Joint Strike Fighter
<b>MFR</b>	Memorandum for Record
<b>NCR</b>	National Capital Region
<b>OUSD(C)</b>	Office of the Under Secretary of Defense (Comptroller)
<b>SES</b>	Senior Executive Service
<b>WHS</b>	Washington Headquarters Services
<b>USD(C)</b>	Under Secretary of Defense (Comptroller)

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### **U.S. DEPARTMENT OF DEFENSE**

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