

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Ahuruonye v. Department of the Interior

Civil Action No. 17-2061 (RBW) (D.D.C. Apr. 13, 2026) · No. Civil Action No. 17-2061 (RBW) · Decided April 13, 2026

SUMMARY

The United States District Court for the District of Columbia considers the Department of the Interior’s motion to dismiss Barry Ahuruonye’s Second Amended Complaint. The plaintiff, proceeding pro se, alleges discrimination and retaliation under Title VII and the Rehabilitation Act arising from employment actions following his reinstatement. The opinion addresses the pleading standards applicable to the plaintiff’s fourteen claims, including allegations concerning telework, reassignment, performance standards, supervisory conduct, and disciplinary actions.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Reginald B. Walton
JURISDICTION	United States District Court for the District of Columbia
DECIDED	April 13, 2026
DOCKET	Civil Action No. 17-2061 (RBW)
DISPOSITION	other
PROCEDURAL POSTURE	The court considered the defendants' motion to dismiss the plaintiff's Second Amended Complaint under Federal Rule of Civil Procedure 12(b)(6).
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, construes the complaint in the plaintiff's favor, and determines whether the complaint states a plausible claim for relief. Legal conclusions and unsupported inferences are not accepted as true. Pro se pleadings are liberally construed.
PRECEDENTIAL VALUE	Published district court memorandum opinion; persuasive authority within the District of Columbia but not binding precedent beyond the case.
PARTIES	Barry Ahuruonye v. United States Department of the Interior, Doug Burgum, in his official capacity as Secretary of the Interior

TOPICS

employment discrimination

retaliation

ada / disability

reasonable accommodation

motions to dismiss

PRACTICE AREAS

employment law

civil rights

federal employment law

administrative law

QUESTIONS PRESENTED

1. Whether the plaintiff adequately pleaded Title VII discrimination claims based on alleged nonpromotion, telework-related actions, performance standards, restrictions on access and communications, reassignment, an email assignment, a reprimand, an absenteeism accusation, temporary loss of health benefits, and failure to investigate.
2. Whether the plaintiff adequately pleaded Title VII retaliation claims based on the same alleged actions and on questioning about his EEO complaint.
3. Whether the plaintiff adequately pleaded a Rehabilitation Act disability-discrimination claim.
4. Whether the plaintiff adequately pleaded a Rehabilitation Act failure-to-accommodate claim based on denial of telework and requests for medical documentation.
5. Whether the court had jurisdiction over any claim challenging the settlement agreement's reinstatement terms or seeking contract damages exceeding \$10,000.

HOLDINGS

1. A complaint survives a Rule 12(b)(6) motion only when its well-pleaded factual allegations, accepted as true and construed in the plaintiff's favor, state a facially plausible claim for relief; conclusory allegations and unsupported legal inferences do not suffice.
2. A Title VII discrimination plaintiff must allege an adverse employment action causing some harm to a term, condition, or privilege of employment and facts giving rise to an inference of discrimination.
3. To state a disability-discrimination claim under the Rehabilitation Act, a plaintiff must allege that he was a qualified individual with a disability, that the employer knew of the disability, and that he suffered an adverse employment action because of the disability.
4. A plaintiff plausibly states a Rehabilitation Act failure-to-accommodate claim by alleging a disability, employer notice, ability to perform essential functions with a reasonable accommodation, and refusal to provide the accommodation; an employer may request medical documentation and must participate in the interactive process in good faith.
5. A plaintiff is not categorically barred from stating a Title VII retaliation claim based on conduct interfering with the EEO process; questioning an employee about why he complained of harassment during a performance meeting may be materially adverse if it could dissuade a reasonable worker from making or supporting a discrimination charge.
6. A claim challenging the settlement agreement's reinstatement terms and seeking more than \$10,000 in contract damages falls within the exclusive jurisdiction of the Court of Federal Claims, and a settlement

agreement barred challenges to matters that had been or could have been raised through the date of execution.

KEY QUOTATIONS

“merely refusing an employee’s request to telework is not, because there is no ‘identifiable term or condition of employment’ that has been harmed by the denial.” (at 17)

“the Court concludes that it is plausible that Ms. Van Alstyne’s questioning of the plaintiff about “why he was complaining about harassment” during a meeting about his performance expectations, 2d Am. Compl. at 46, might “discourage an employee . . . from bringing [EEO] discrimination charges” that he otherwise would bring” (at 35)

FACTUAL BACKGROUND

Barry Ahuruonye, an African American man of Nigerian national origin, was employed by the Department of the Interior as a Grants Management Specialist and was terminated from a term appointment in 2012. After an administrative appeal, the parties entered a settlement agreement requiring his reinstatement at GS-12, and he alleged that supervisors thereafter denied or rescinded telework, imposed performance requirements, restricted his communications with auditors, failed to investigate his complaints, reprimanded him, and questioned him about his EEO activity. The court concluded that most alleged actions were not sufficiently adverse or were unsupported by facts linking them to discriminatory or retaliatory animus, but allowed portions of the Rehabilitation Act accommodation claim and the retaliation claim based on questioning about the EEO complaint to proceed.

PROCEDURAL HISTORY

Ahuruonye brought Title VII and Rehabilitation Act claims arising from alleged discriminatory and retaliatory employment actions after his reinstatement under a 2013 settlement agreement. The court previously granted leave to amend in part, dismissed without prejudice proposed national-origin and hostile-work-environment claims, and directed the plaintiff to proceed on fourteen claims corresponding to his EEOC appeal. The court granted in part and denied in part the defendants' motion to dismiss, allowing only portions of the Rehabilitation Act failure-to-accommodate claim and the Title VII retaliation claim based on questioning about the plaintiff's EEO complaint to proceed.

DISPOSITION

other

CASES CITED

- Ahuruonye v. U.S. Dep't of Interior, No. 16-cv-1767 (RBW), 2022 WL 1746656 (D.D.C. May 31, 2022)
- Trevor F. v. Zinke, EEOC Doc. 0120150183, 2017 WL 3393856 (EEOC July 28, 2017)
- Hackley v. Roudebush, 520 F.2d 108, 115 n.17 (D.C. Cir. 1975)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)

- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555-56, 570 (2007)
- *Hettinga v. United States*, 677 F.3d 471, 476 (D.C. Cir. 2012)
- *Equal Emp. Opportunity Comm'n v. St. Francis Xavier Parochial Sch.*, 117 F.3d 621, 624 (D.C. Cir. 1997)
- *Kaempe v. Myers*, 367 F.3d 958, 963, 965 (D.C. Cir. 2004)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *Chambers v. District of Columbia*, 35 F.4th 870, 872 (D.C. Cir. 2022)
- *Muldrow v. City of St. Louis*, 601 U.S. 346, 347, 354-56 (2024)
- *Baloch v. Kempthorne*, 550 F.3d 1191, 1196, 1198 (D.C. Cir. 2008)
- *Walker v. Johnson*, 798 F.3d 1085, 1091 (D.C. Cir. 2015)
- *Stella v. Mineta*, 284 F.3d 135, 145 (D.C. Cir. 2002)
- *Congress v. District of Columbia*, 324 F. Supp. 3d 164, 175 (D.D.C. 2018)
- *Minter v. District of Columbia*, 809 F.3d 66, 69 (D.C. Cir. 2015)
- *Buie v. Berrien*, 85 F. Supp. 3d 161, 171-72 (D.D.C. 2015)
- *Aka v. Wash. Hosp. Ctr.*, 156 F.3d 1284, 1305 (D.C. Cir. 1998)
- *Graffius v. Shinseki*, 672 F. Supp. 2d 119, 126, 130 (D.D.C. 2009)
- *Ward v. McDonald*, 762 F.3d 24, 32 (D.C. Cir. 2014)
- *Burlington N. & Santa Fe Ry. v. White*, 548 U.S. 53, 54, 57, 67-71 (2006)
- *Robinson v. Shell Oil Co.*, 519 U.S. 337, 346 (1997)
- *Jones v. Bernanke*, 557 F.3d 670, 677 (D.C. Cir. 2009)
- *Green v. Haaland*, No. 21-cv-329 (RDM), 2022 WL 898864, at *9 (D.D.C. Mar. 28, 2022)
- *Gross v. FBL Fin. Servs., Inc.*, 557 U.S. 167, 176 (2009)
- *Doak v. Johnson*, 19 F. Supp. 3d 259, 280 (D.D.C. 2014), *aff'd*, 798 F.3d 1096 (D.C. Cir. 2015)
- *Wilson v. Noem*, No. 20-cv-100 (GMH), 2025 WL 1000666, at *22, *24 (D.D.C. Apr. 3, 2025)
- *Black v. Guzman*, No. 22-cv-1873 (BAH), 2023 WL 3055427, at *8 (D.D.C. Apr. 24, 2023)
- *Yazzi v. Nat'l Org. for Women*, 712 F. Supp. 3d 56, 78 (D.D.C. 2024)
- *Allen v. Napolitano*, 774 F. Supp. 2d 186, 199-200 (D.D.C. 2011)
- *Jones v. Bush*, 160 F. Supp. 3d 325, 344, 347 (D.D.C. 2016), *aff'd*, No. 16-5103, 2017 WL 2332595 (D.C. Cir. Feb. 21, 2017)
- *Caison v. Tulino*, No. 23-cv-2414 (LLA), 2025 WL 947470, at *6 (D.D.C. Mar. 28, 2025)
- *Stewart v. Evans*, 275 F.3d 1126, 1136 (D.C. Cir. 2002)
- *Akosile v. Armed Forces Retirement Home*, 141 F. Supp. 3d 75, 93 (D.D.C. 2015)
- *Runkle v. Gonzales*, 391 F. Supp. 2d 210, 223 (D.D.C. 2005)
- *Boyd v. District of Columbia*, No. 22-cv-3741 (RC), 2024 WL 324109, at *7 (D.D.C. Jan. 29, 2024)
- *Lawson v. Sessions*, 271 F. Supp. 3d 119, 141 (D.D.C. 2017)
- *Harrigan v. Carson*, No. 17-cv-930 (TJK), 2019 WL 4737119, at *4 (D.D.C. Sept. 28, 2019)
- *Briscoe v. Kerry*, 111 F. Supp. 3d 46, 59 (D.D.C. 2015)
- *Jordan v. Summers*, 205 F.3d 337, 342 (7th Cir. 2000)

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