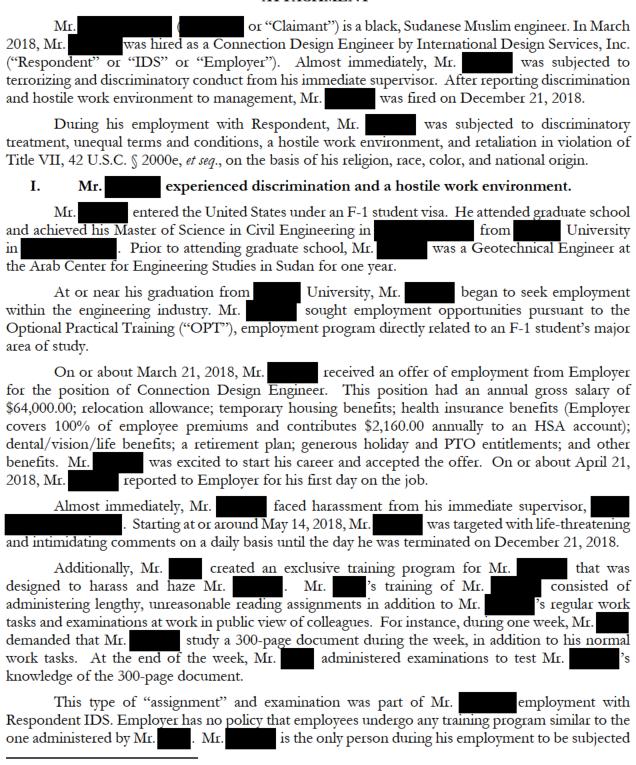
EEOC Form 5 (5/01)		
CHARGE OF DISCRIMINATION	Charge Presented to: Agency(ies) Charge No(s):	
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	FEPA X_ EEOC	
and EEOC		
State or local Agency, if any		
Name (indicate Mr. Ms. Mrs.) Mr.	Home Phone (Incl. Are	ea Code) Date of Birth
Street Address City, State and ZIP Code		
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I halipy a Discriptional Approach May be Others. He may they have the have the have they have the have the have the have the h		
That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.) Name No. Employees, Members Phone No. (Include Area Code)		
International Design Services, Inc.	15+	314-872-1791
Street Address City, State and ZIP Code 1801 Park 270 Dr. Suite 220, St. Louis, MO 63146		
Name No.	. Employees, Members	Phone No. (Include Area Code)
Street Address City, State and ZIP Code		
DISCRIMINATION BASED ON (Check appropriate box(es).) DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest		
XRACE X COLOR SEX X RELIGION X NATIONAL ORIGIN April 2018 Dec. 21, 2018		
X RETALIATION AGEDISABILITY OTHER (Specify below.) CONTINUING ACTION		
THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)):		
(Please See Attachment)		
I want this charge filed with both the EEOC and the State or local Agencif any. I will advise the agencies if I change my address or phone numb and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		
I declare under penalty of perjury that the above is true and correct.		
Date Charging Party Signature		



Council on American-Islamic Relations, New York

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ATTACHMENT1



¹ This statement is by its very nature not entirely exhaustive of all of the details of Claimant's incidents of discrimination. Claimant will of course make himself available for an interview with an EEOC investigator.

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E-mail: legal@ny.cair.com to this condition of employment. These examinations caused extreme and debilitating stress for Mr. conducted these examinations in public view of Mr. 's co-workers and Mr. 's supervisors. During these examinations, Mr. questioned Mr. , and, in a yelling, intense manner made physical and verbal threats and demeaning comments including, but not limited to: "If you get it [the answer to the question] wrong, I'll run you over with the car." "You belong to me!" While making a finger gun hand gesture mimicking a handgun and while pointing and placing the finger gun on Mr. 's forehead, Mr. would say "if you get it wrong, I'm going to shoot you." Mr. pretended to shoot Mr. While holding his hand near Mr. 's face, Mr. would inform Mr. that he would "slap you Mr.] in the face" if you get this question wrong. Mr. would then make a slapping motion as if to slap Mr. in the face. regularly ridiculed and berated Mr. by calling him stupid in Mr. front of colleagues. At times, Mr. would ask Mr. "Do you want to write the word 'stupid', so you remember how stupid you are?" was subjected to these comments and others on a regular, daily basis. Additionally, whenever Mr. made a mistake or failed to deliver something to Mr. liking, he was subjected to verbal harassment and threats. Whenever Mr. correctly answered exam questions, Mr. only created more complex questions designed to trip up Mr. which point Mr. would unleash his fury. On at least one occasion, Mr. asked Mr. : "Do you guys [Africans] eat monkey brains?" On another occasion, Mr. stated that he will never hire someone with a green card (legal permanent residency) because the green card holder has the option of leaving or quitting and will not work as hard. Because Mr. was not a green card holder, Mr. felt empowered to discriminate against and create a hostile workplace for Mr. . Mr. 's hostility was open and condoned by Respondent IDS. 's training and employment was a "bootcamp" designed to harass, humiliate, and intimidate him. Moreover, Mr. took pleasure in administering this "bootcamp" and in harassing Mr. II. Mr. engaged in proselytizing in the workplace and extreme hostility towards Islam. In addition to targeting Mr. for negative treatment because of his religion, race, color, and national origin, Mr. regularly engaged in proselytizing in the workplace. At least once or made negative, offensive comments about Mr. twice a week, Mr. 's Muslim faith and his faith and to convert or stop Mr. designed to demean Mr. from practicing his faith.

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For instance, Mr. regularly questioned Mr. about his pray. As a Muslim, Mr. sincerely beliefs in performing regular pray. Because of the religious hostility displayed by was afraid of engaging in any outward Muslim practices such as praying. would sneak and hide during his breaks to pray behind a stairwell or other Instead, Mr. secluded area. Mr. would pray while he was in total fear of being found and subjected to additional harassment. would regularly tell Mr. that he did not need or have to pray and questioned regarding why he Mr. followed his religion. During Ramadan, holy month when Muslims fast from sunrise to sunset, Mr. would question Mr. about fasting: why he was fasting; how he was fasting; explain why Mr. should not fast; how unhealthy fa is; and how Mr. should not follow his faith for the sake of his own health. Mr. should not fast; how unhealthy fasting questions were not geared at engaging in friendly conversation or learning. Instead, the questioning was intended to ridicule Mr. about his faith. does not drink alcohol in accordance with his sincerely held religious beliefs. Yet, continuously pressured Mr. to drink alcohol. Mr. would ask "why aren't you allowed to drink alcohol?" and would tell Mr. that he "should try alcohol." Mr. that he was boring and should drink alcohol to be more exciting. Mr. informed Mr. on at least 10 occasions "I don't like your religion. It doesn't make any sense." even told Mr. is the only employee that Mr. targeted in this fashion. The one religious accommodation that Mr. was granted was the ability to attend Jummah, Friday congregational prayer. Mr. would leave the workplace to attend Jummah. was Muslim and had received a religious accommodation did not sit well The fact that Mr. or the engineering department manager, When he would return from Jummah, he was always subjected to the examinations, described above, and the harassment, ridicule, and life-threatening comments were at their worse. was retaliated against for engaging in protected activity. III. Mr. After enduring the treatment described above for several months, Mr. complaint with Mr. . The incidents described above all occurred at or near Mr. workstation which is an open space in the workplace. Mr. and the other employees were all fully aware of the treatment that Mr. was enduring. Yet, Mr. took no corrective steps to stop the discrimination and end the hostile workplace environment. Even though Mr. aware of the workplace incidents, Mr. still reported the incidents and requested Mr. explained to assistance. Additionally, Mr. the effects that Mr. 's work and personal health. Despite Mr. 's report and request, Mr. having on Mr. took no action. Mr. made this report on or about late October or beginning of November 2018. After Mr. made his complaint to Mr. , the harassment described above increased in frequency and intensity. As before, this harassment and retaliatory conduct occurred in public and under the eye of Mr. complained to Mr. , he was fired. Specifically, on December Shortly after Mr.

21, 2018, Mr. was terminated because of the negative feedback from Mr.



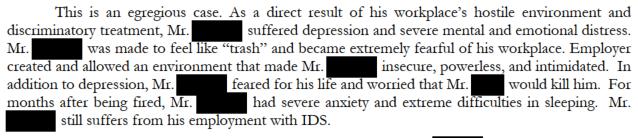
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informed Mr. at his termination meeting that he was not a good fit and that in this industry there are not two persons like Mr.

Mr. engaged in protected activity when he made his complaint to Mr. subsequent treatment and termination amounted to retaliation.

IV. Conclusion



The toxicity of the workplace was demoralizing, and Mr. began to question his abilities and life, career, and industry decisions. Because Mr. was fired, he lost his medical benefits and could not afford to see any medical experts for treatment.

Employer's conduct amounts to discrimination, retaliation, and hostile work environment on the basis of religion, race, color, and national origin in violation of Title VII of the Civil Rights Act of 1964, as amended.