

<p>CHARGE OF DISCRIMINATION</p> <p><small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small></p>	<p>Charge Presented to: Agency(ies) Charge No(s):</p> <p><input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC</p>
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_____ and EEOC
State or local Agency, if any

Name (indicate Mr. Ms. Mrs.) Mr. [REDACTED]	Home Phone (Incl. Area Code) [REDACTED]	Date of Birth [REDACTED]
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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 believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name International Design Services, Inc.	No. Employees, Members 15+	Phone No. (include Area Code) 314-872-1791
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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)
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Street Address _____ City, State and ZIP Code _____

<p>DISCRIMINATION BASED ON (Check appropriate box(es).)</p> <p><input checked="" type="checkbox"/> RACE <input checked="" type="checkbox"/> COLOR <input type="checkbox"/> SEX <input checked="" type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN</p> <p><input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify below.)</p>	<p>DATE(S) DISCRIMINATION TOOK PLACE</p> <table style="width:100%;"> <tr> <td style="text-align: center;">Earliest</td> <td style="text-align: center;">Latest</td> </tr> <tr> <td style="text-align: center;">April 2018</td> <td style="text-align: center;">Dec. 21, 2018</td> </tr> </table> <p><input type="checkbox"/> CONTINUING ACTION</p>	Earliest	Latest	April 2018	Dec. 21, 2018
Earliest	Latest				
April 2018	Dec. 21, 2018				

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 Agency, if any. I will advise the agencies if I change my address or phone number 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



ATTACHMENT¹

Mr. [REDACTED] ([REDACTED] or “Claimant”) is a black, Sudanese Muslim engineer. In March 2018, Mr. [REDACTED] was hired as a Connection Design Engineer by International Design Services, Inc. (“Respondent” or “IDS” or “Employer”). Almost immediately, Mr. [REDACTED] was subjected to terrorizing and discriminatory conduct from his immediate supervisor. After reporting discrimination and hostile work environment to management, Mr. [REDACTED] was fired on December 21, 2018.

During his employment with Respondent, Mr. [REDACTED] was subjected to discriminatory treatment, unequal terms and conditions, a hostile work environment, and retaliation in violation of Title VII, 42 U.S.C. § 2000e, *et seq.*, on the basis of his religion, race, color, and national origin.

I. Mr. [REDACTED] experienced discrimination and a hostile work environment.

Mr. [REDACTED] entered the United States under an F-1 student visa. He attended graduate school and achieved his Master of Science in Civil Engineering in [REDACTED] from [REDACTED] University in [REDACTED]. Prior to attending graduate school, Mr. [REDACTED] was a Geotechnical Engineer at the Arab Center for Engineering Studies in Sudan for one year.

At or near his graduation from [REDACTED] University, Mr. [REDACTED] began to seek employment within the engineering industry. Mr. [REDACTED] sought employment opportunities pursuant to the Optional Practical Training (“OPT”), employment program directly related to an F-1 student’s major area of study.

On or about March 21, 2018, Mr. [REDACTED] received an offer of employment from Employer for the position of Connection Design Engineer. This position had an annual gross salary of \$64,000.00; relocation allowance; temporary housing benefits; health insurance benefits (Employer covers 100% of employee premiums and contributes \$2,160.00 annually to an HSA account); dental/vision/life benefits; a retirement plan; generous holiday and PTO entitlements; and other benefits. Mr. [REDACTED] was excited to start his career and accepted the offer. On or about April 21, 2018, Mr. [REDACTED] reported to Employer for his first day on the job.

Almost immediately, Mr. [REDACTED] faced harassment from his immediate supervisor, [REDACTED]. Starting at or around May 14, 2018, Mr. [REDACTED] was targeted with life-threatening and intimidating comments on a daily basis until the day he was terminated on December 21, 2018.

Additionally, Mr. [REDACTED] created an exclusive training program for Mr. [REDACTED] that was designed to harass and haze Mr. [REDACTED]. Mr. [REDACTED]’s training of Mr. [REDACTED] consisted of administering lengthy, unreasonable reading assignments in addition to Mr. [REDACTED]’s regular work tasks and examinations at work in public view of colleagues. For instance, during one week, Mr. [REDACTED] demanded that Mr. [REDACTED] study a 300-page document during the week, in addition to his normal work tasks. At the end of the week, Mr. [REDACTED] administered examinations to test Mr. [REDACTED]’s knowledge of the 300-page document.

This type of “assignment” and examination was part of Mr. [REDACTED] employment with Respondent IDS. Employer has no policy that employees undergo any training program similar to the one administered by Mr. [REDACTED]. Mr. [REDACTED] is the only person during his employment to be subjected

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.

to this condition of employment. These examinations caused extreme and debilitating stress for Mr. [REDACTED].

Mr. [REDACTED] conducted these examinations in public view of Mr. [REDACTED]'s co-workers and Mr. [REDACTED]'s supervisors. During these examinations, Mr. [REDACTED] questioned Mr. [REDACTED], 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. [REDACTED]'s forehead, Mr. [REDACTED] would say “if you get it wrong, I’m going to shoot you.” Mr. [REDACTED] pretended to shoot Mr. [REDACTED].
- While holding his hand near Mr. [REDACTED]'s face, Mr. [REDACTED] would inform Mr. [REDACTED] that he would “slap you [Mr. [REDACTED]] in the face” if you get this question wrong. Mr. [REDACTED] would then make a slapping motion as if to slap Mr. [REDACTED] in the face.
- Mr. [REDACTED] regularly ridiculed and berated Mr. [REDACTED] by calling him stupid in front of colleagues. At times, Mr. [REDACTED] would ask Mr. [REDACTED] “Do you want to write the word ‘stupid’, so you remember how stupid you are?”

Mr. [REDACTED] was subjected to these comments and others on a regular, daily basis. Additionally, whenever Mr. [REDACTED] made a mistake or failed to deliver something to Mr. [REDACTED]'s liking, he was subjected to verbal harassment and threats. Whenever Mr. [REDACTED] correctly answered exam questions, Mr. [REDACTED] only created more complex questions designed to trip up Mr. [REDACTED] at which point Mr. [REDACTED] would unleash his fury.

On at least one occasion, Mr. [REDACTED] asked Mr. [REDACTED]: “Do you guys [Africans] eat monkey brains?” On another occasion, Mr. [REDACTED] 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. [REDACTED] was not a green card holder, Mr. [REDACTED] felt empowered to discriminate against and create a hostile workplace for Mr. [REDACTED]. Mr. [REDACTED]'s hostility was open and condoned by Respondent IDS.

Mr. [REDACTED]'s training and employment was a “bootcamp” designed to harass, humiliate, and intimidate him. Moreover, Mr. [REDACTED] took pleasure in administering this “bootcamp” and in harassing Mr. [REDACTED].

II. Mr. [REDACTED] engaged in proselytizing in the workplace and extreme hostility towards Islam.

In addition to targeting Mr. [REDACTED] for negative treatment because of his religion, race, color, and national origin, Mr. [REDACTED] regularly engaged in proselytizing in the workplace. At least once or twice a week, Mr. [REDACTED] made negative, offensive comments about Mr. [REDACTED]'s Muslim faith designed to demean Mr. [REDACTED] and his faith and to convert or stop Mr. [REDACTED] from practicing his faith.

For instance, Mr. █████ regularly questioned Mr. █████ about his pray. As a Muslim, Mr. █████ sincerely believes in performing regular pray. Because of the religious hostility displayed by Mr. █████, Mr. █████ was afraid of engaging in any outward Muslim practices such as praying. Instead, Mr. █████ would sneak and hide during his breaks to pray behind a stairwell or other secluded area. Mr. █████ would pray while he was in total fear of being found and subjected to additional harassment.

Mr. █████ would regularly tell Mr. █████ that he did not need or have to pray and questioned Mr. █████ 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 fasting is; and how Mr. █████ should not follow his faith for the sake of his own health. Mr. █████'s questions were not geared at engaging in friendly conversation or learning. Instead, the questioning was intended to ridicule Mr. █████ about his faith.

Mr. █████ does not drink alcohol in accordance with his sincerely held religious beliefs. Yet, Mr. █████ 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. █████ also informed Mr. █████ that he was boring and should drink alcohol to be more exciting. Mr. █████ even told Mr. █████ on at least 10 occasions "I don't like your religion. It doesn't make any sense."

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. The fact that Mr. █████ was Muslim and had received a religious accommodation did not sit well with 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.

III. Mr. █████ was retaliated against for engaging in protected activity.

After enduring the treatment described above for several months, Mr. █████ made a complaint with Mr. █████. The incidents described above all occurred at or near Mr. █████'s 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. █████ was aware of the workplace incidents, Mr. █████ still reported the incidents and requested Mr. █████'s assistance. Additionally, Mr. █████ explained to █████ the effects that Mr. █████'s conduct was having on Mr. █████'s work and personal health. Despite Mr. █████'s report and request, 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. █████.

Shortly after Mr. █████ complained to Mr. █████, he was fired. Specifically, on December 21, 2018, Mr. █████ was terminated because of the negative feedback from Mr. █████. Mr. █████

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

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

IV. Conclusion

This is an egregious case. As a direct result of his workplace's hostile environment and discriminatory treatment, Mr. [REDACTED] suffered depression and severe mental and emotional distress. Mr. [REDACTED] was made to feel like "trash" and became extremely fearful of his workplace. Employer created and allowed an environment that made Mr. [REDACTED] insecure, powerless, and intimidated. In addition to depression, Mr. [REDACTED] feared for his life and worried that Mr. [REDACTED] would kill him. For months after being fired, Mr. [REDACTED] had severe anxiety and extreme difficulties in sleeping. Mr. [REDACTED] still suffers from his employment with IDS.

The toxicity of the workplace was demoralizing, and Mr. [REDACTED] began to question his abilities and life, career, and industry decisions. Because Mr. [REDACTED] 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.