

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION****Philadelphia District Office****Attorney Referred Charge Checklist**Your Name (Charging Party's Attorney's Name): **Steven Auerbach**Your e-mail address (Charging Party's Attorney's e-mail): **auerbach.steven@gmail.com**Your firm's name & address: **Law Office of Steven T. Auerbach; 201 Meeting House Lane. Merion Station, PA 19066**

Date Submitted:	<b>5/3/23</b>	<b>EEOC Office Use Only</b> Date Received:	
Location of Alleged Discrimination	<b>Philadelphia, PA</b>		
Date(s) of Alleged Discrimination:	<b>4/29/23</b>		
Statute/s: <b>Title VII, PHRA, PFPO</b>	Basis (protected class/es): <b>Retaliation</b> Issue (alleged discriminatory action/s): <b>Wrongful Termination</b>		
Charging Party	Name: <b>Arslan Shaikh</b> E-mail address: <b>arsy.shaikh1@gmail.com</b>		
	National Origin: <b>American</b> Race: <b>Turkish</b> Gender: <b>Male</b> DOB: <b>5/13/91</b>		
Respondent	Name of Respondent: <b>Al-Aqsa Islamic Society and Shireen Hammoudeh</b> Name of Respondent official who should receive the Charge: <b>Shireen Hammoudeh</b> Address of Respondent official: <b>1501 N. Germantown Ave. Philadelphia, PA 19122</b>  E-mail address of Respondent official:		
Is this an Amended Charge:		Yes	No
If yes, provide: Charge No.			<b>x</b>

Is this related to a previously filed Charge:	Yes	No <b>x</b>
If yes, provide: Charge No.		
Have you previously filed this matter with EEOC or another agency:	Yes	No <b>x</b>
If yes, provide name of agency & date of filing:		
Prefer Mediation	Yes <b>x</b>	Need mor info.
Requesting Immediate Issuance of Right to Sue	Yes	No <b>x</b>



**A. Retaliation**

1. Until April 29, 2023, Complainant was a teacher of secular general studies with Respondent.
2. On April 27, 2023, the principal of Respondent, Ms. Shireen Hammoudeh, invalidated student complaints in front of Complainant. Ms. Hammoudeh stated that the only reason that two African American girls had made complaints was because they are black and that they are making up these allegations to create a lawsuit and that she was going to look for a reason to get rid of them.
3. The next day, Respondent emailed George Donnelly (Chief of Staff of the Pennsylvania State Senate) about Ms. Hammoudeh’s racist remarks and about Respondent’s trend of disproportionately targeting African American students for removal.
4. 30 minutes later, Complainant was locked out of his email.
5. The following day, Complainant was fired.
6. A copy of the complaint and termination letter is attached hereto.

<p>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.</p>	<p>NOTARY – <i>When necessary for State and Local Agency Requirements</i></p>
<p>I declare under penalty of perjury that the above is true and correct.</p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT</p>
<p><u>5/3/23</u>                      <u>Arslan Shariq/SA</u></p> <p>Date                                      Charging Party Signature</p>	<p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</p>

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Formal Request for Investigation into Incident by Head of School

**Mr. Shaikh** arsy.shaikh@gmail.com

Dear Senator Donnelly,

I am writing to bring to your attention a serious incident that recently took place at Al Aqsa Islamic Academy. Yesterday, two of my students made allegations against me for being inappropriate with them, but the extent of these allegations I have not learned as no other details were shared with me other than the assistant to the principal, Mrs. Sabini, came into my room during instructions and in front of a classroom filled with 3rd graders, stated that several 4th grade girls in the office saying "they don't feel safe around you" "they said you didn't teach them anything" and "they said you have been inappropriate with them" However, this is not the reason for my communication with you today.

After my class was over, I went to Mrs. Shirreen's office to inquire about the comments made to me while I was with the 3rd graders. During my meeting with Mrs. Shirreen on April 27th, 2023 at approximately 2:20pm regarding these allegations, Mrs. Shirreen made a statement that deeply concerns me. She attributed the allegations made by the two African American girls against me to their race, stating "because they are black" (they are making these allegations to create a lawsuit). She also said "we need to get rid of them" referring to both students by name and when she learned that one of them had already paid their registration fee for next year she became extremely upset. There has been a trend at Al Aqsa Islamic Academy of the removal of African American students in an unproportional number. The African American students are either expelled, told to attend 100% virtually, or they are told not to come back the following year. This trend is clear by analyzing the date of students that have been removed or told not to return (office refusing to register the student for the following year).

These abhorrent statements were captured on audio and video recordings systems, which were installed in the office following a previous accusation against the former principal. Please note that our video system usually holds recordings for 2-3 weeks but to prevent intentional "spoliation" of the evidence, I am urging you to send a "spoliation letter" to all parties that have access to the audio and video recording system on notice to retain the evidence.

As a professional, I am alarmed by such an explicit display of racism by our school administration, and I urge you to conduct a thorough investigation into the matter. The audio and video recordings can serve as evidence of Mrs. Shirreen's statements and I am willing to cooperate fully with any inquiry.

As Muslims, we firmly believe that all human beings are equal and should be treated with fairness and respect, regardless of their race, ethnicity, or background. I believe that it is crucial to address any instance of discrimination, particularly in an educational setting that seeks to instill values of tolerance and inclusion.

Thank you for your attention to this matter. I look forward to your response.

Sincerely,



**Mr. Shaikh**

4TH GRADE TEACHER

Phone: 215-299-8786  
 Email: arsy.shaikh@gmail.com  
 Website: AlAqsaIslamicAcademy.org  
 Address: Al Aqsa Islamic Academy, 1501 Germantown Ave, Philadelphia, PA 19122

*Al-Aqsa Islamic Academy*

1501 N. Germantown Ave. Phila. PA 19122 Phone: 215-765-6660 Fax: 215-765-6640

To Arslan Shaikh:  
20 W SPRING AVE  
ARDMORE, PA 19003

I am writing to inform you that your services as a teacher at Al-Aqsa Islamic Academy will be terminated effective 04/28/2023.

Return all school items and materials that belong to the school. This includes keys, books, instructional materials, laptops, and any other school property that may be in your possession. Give all items to the school security guard by 5/4/2023.

Furthermore, we would like to remind you that as per school policy, you do not have permission to access or go through any school emails, records, or documents. You have no authorization to contact any Al-Aqsa Students, families, or staff.

We will provide you with your final paycheck and the next two weeks after termination date.

Best,

Al-Aqsa Academy Administration