

**OFFICE OF THE ILLINOIS ATTORNEY GENERAL
LISA MADIGAN - ILLINOIS ATTORNEY GENERAL**

CIVIL RIGHTS INTAKE QUESTIONNAIRE

1. Type or print clearly in dark ink.
2. Incomplete or unclear forms will be returned to you.
3. Enclose copies of important papers concerning your discrimination complaint.

Please return completed intake form to:

**OFFICE OF THE ILLINOIS ATTORNEY GENERAL
Civil Rights Bureau
100 W. Randolph Street
Chicago, Illinois 60601
FAX: (312) 814-3212**

TODAY'S DATE: 03/10/2013

1. Your name: ☒ Mr. ☐ Ms. GILLES K. KOUASSI

Age: 49

Address 1: 137 JAMES Dr.

Address 2:

City: MACOMB

State: IL

Zip Code: 61455

Home Phone Number: 309-421-0370

Work Phone Number: 309-298-1727

Cell Phone Number:

E-mail Address: gilleskkouassi@gmail.com

Preferred phone number(s) for communications with our office regarding your complaint:

☒ Home Phone ☐ Work Phone ☐ Cell Phone

2. Please provide an alternate contact in case our office is unable to reach you.

Name: ☐ Mr. ☒ Ms. Marie-Claire Koissi-Kouassi

Address 1:

Address 2:

City: Macomb

State: IL

Zip Code: 61455

Phone Number: 309-421-0370

3. The discrimination you experienced is based on [check appropriate box(es)]:

- | | | |
|---|---|--|
| <input type="checkbox"/> Age | <input type="checkbox"/> Marital Status | <input type="checkbox"/> Citizenship Status |
| <input checked="" type="checkbox"/> Race | <input checked="" type="checkbox"/> National Origin | <input type="checkbox"/> Gender/Sexual Harassment |
| <input checked="" type="checkbox"/> Color | <input type="checkbox"/> Sexual Orientation | <input type="checkbox"/> Arrest Record |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Gender/Pregnancy | <input type="checkbox"/> Order of Protection Status |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Familial Status | <input type="checkbox"/> Military Status |
| <input type="checkbox"/> Ancestry | <input type="checkbox"/> Other | <input type="checkbox"/> Unfavorable Discharge from Military |

4. Please provide the full name of the company, business, employer, etc., (hereafter called the "Respondent") that you believe discriminated against you.

Name:

WESTERN ILLINOIS UNIVERSITY (DEPARTMENT OF CHEMISTRY)

Illinois Address:

1 UNIVERSITY CIRCLE

City:

MACOMB

State:

IL

Zip Code:

61455

Phone Number:

309-298-1824

County:

McDONOUGH

5. How many employees does the Respondent have? (Consider all locations)

1000 (APPROXIMATELY)

6. Are you currently employed by the Respondent? ☒ Yes ☐ No

If you are/were employed by the Respondent, provide the following information:

Job Title:

ASSOCIATE PROFESSOR OF PHYSICAL CHEMISTRY

Date Hired:

APRIL 2007

Department:

CHEMISTRY

Supervisor:

ROSE McCONNELL

Were you employed by a company other than the Respondent?

☐ Yes

☒ No

If yes, state the name of the company and explain:

7. Please use the space below to tell us exactly what happened. Attach additional pages if necessary.

The Chair of the Department of Chemistry prevented me from entering a classroom to perform my professional duties.

She repeatedly make an issue of my accent saying that it is distracting, thick... The Chair, the DPC Chair, the Dean of the CAS and the Provost conspired to use an illicit evaluation tool to deny me PAA and tenure, violating the existing agreement (attachment).

8. How were others in your situation treated?

The process is targeted to get rid of me. Others were treated differently. For example, most of faculty are from foreign origin, each with his accent. Some of them can barely speak English. Yet, my chair has nothing to say about their accent except mine.

The department criteria supposed to be used to evaluate the performance of faculty members is applied to me differently.

9. Do you have witnesses who can support your claim of discrimination? If so, state their names, addresses and phone numbers and the pertinent information they can provide.

Name: Dr. Tarab Ahmad

Address: 324 Currents Hall, Department of Chemistry, Western Illinois University, Macomb IL, 61455.

Phone Number: 309-569-1081

Information the witness will provide:

She can provide information about the chair changing the lock to prevent me from entering a classroom to teach.

She can provide information on the conspiracy and development of an illicit evaluation tool to deny me tenure

She can testify on the fact that the Chair has hidden copies of my evaluations and falsified my evaluation documents

Name: Professor Mark Boley

Address: Chair Department of Physics, 422 Currens Hall, Macomb IL 61455

Phone Number: 309-298-1824

Information the witness will provide:

He can provide information about the chair changing the lock to prevent me from entering a classroom to teach.

He helped me to get a new key in less than 48h, what my chair did nothing to help in 2 weeks

He is aware of the chair hiding my evaluation copies.

Name: Dr. Made Gowda (retired professor)

Address: 216 Wagonner Hall, University Circle, Macomb, IL 61455

Phone Number: 309-255-2454

Information the witness will provide:

He can provide information on the double-standard applied by the chair and the DPC in evaluating my performance.

He can provide information on the use of an illicit rubric to evaluate my performance

10. Do you have any documents or other evidence to support your claim of discrimination? If so, please attach copies.

☒ Yes ☐ No

11. Have you filed a charge of discrimination with any other agency, company, or group?

☒ Yes ☐ No If your answer is yes, when? October 19, 2012

Name of Entity: EEOC

Charge Number (if applicable): 440-2013-00325

What was the outcome?

The university proposed to go for mediation. However, at the mediation table, the Provost who represented the University showed no interest in addressing the problem and chose to intimidate me. No agreement was reached.

12. Have you tried to resolve your complaint through a formal or informal grievance procedure?

☒ Yes ☐ No If your answer is yes, with whom? Chair, the Dean, and Provost.

What was the outcome?

All violated the existing agreement and rejected the appeals I made saying that they support the chair. She has their support in the discriminative actions perpetrated against me. They are involved in a well planned conspiracy.

The Department Chair, the Dean of the CAS, and the Provost are retaliating against me because I filed a complaint to EEOC.


READ AND SIGN BELOW:

I certify that this information is true and correct to the best of my knowledge.

The Civil Rights Bureau will carefully evaluate your allegations to determine if a formal investigation will be initiated. If this office does not open such an investigation, this action should not be considered a determination of the merits of your allegations or the result of any findings of fact or law.

The Illinois Attorney General cannot obtain financial compensation on your behalf.

You may also file a complaint of discrimination with the Illinois Department of Human Rights (IDHR), 100 West Randolph Street, Suite 10-100, Chicago, IL 60601 at (312) 814-6200. You must file your IDHR complaint within 180 days of the date of discrimination. In addition, if your complaint is against your employer, you may file a complaint of discrimination with the U.S. Equal Employment Opportunity Commission (EEOC), Chicago Regional Office, 500 West Madison Street, Suite 2800, Chicago, IL 60661 at (312) 353-2713. You must file your EEOC complaint within 300 days of the date of discrimination.


Signature


03/10/2013

Date

Gilles K. Kouassi, Ph.D.
Associate Professor
[Quoted text hidden]

2 attachments

 **UPI Agreement2010-15.pdf**
1149K

 **Chemistry DC 2007-2011.pdf**
65K

Gilles Kouassi <gilleskkouassi@gmail.com>
To: "Pond, Laura J." <LPond@atg.state.il.us>

Mon, Apr 8, 2013 at 6:16 AM

Dear Mrs. Pond,

Following the compliant I filed against Western Illinois University on March 10, 2013, you called me on March 26, 2013 to ask questions, as part of your investigation. You also asked me to send you some documentation regarding my case, which I did in responding to an e-mail you sent me the same day. I very much appreciate your time and effort to investigate my compliant.

In order to keep records of all these activities, I would appreciate if you could provide me with an official letter from the Civil Right Bureau Office of the Attorney General stating that you received my compliant. If possible, please provide me with the number of my complaint /file.

I also found out that you left a message on my phone on Thursday April 4, 2013. It is unfortunate that our busy timetables make it very difficult to reach each other during the day. You said in your message that you have more questions for me regarding my complaint. In order to avoid missing each other on the phone during working time, I would appreciate if you could send me your questions through e-mail. That way, I will provide answers and supporting documents in the evening after work.

I thank you for your time and cooperation.

Gilles K. Kouassi
Associate Professor,
Department of Chemistry
Western Illinois University

[Quoted text hidden]

Gilles Kouassi <gilleskkouassi@gmail.com>
To: Gilles Kouassi <gilleskkouassi@gmail.com>

Mon, Apr 8, 2013 at 7:14 AM

Dear Mrs. Pond,

Following the compliant I filed against Western Illinois University on March 10, 2013, you called me on March 26, 2013 to ask questions, as part of your investigation. You also asked me to send you some documentation regarding my case, which I did in responding to an e-mail you sent me the same day. I very much appreciate your time and effort to investigate my compliant.

In order to keep records of all these activities, I would appreciate if you could provide me with an official letter from the Civil Right Bureau Office of the Attorney General stating that you received my compliant. If possible, please provide me with the number of my complaint /file.



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

April 23, 2013

Mr. Gilles Kouassi
137 James Drive
Macomb, IL 61455

Re: Your Complaint Against Western Illinois University
2013-CRC-3062

Dear Mr. Kouassi:

Pursuant to your request, I am writing to acknowledge that the Civil Rights Bureau of the Illinois Attorney General's Office received your complaint against Western Illinois University on March 14, 2013. If you should have any questions concerning your complaint, please feel free to call me at 312-814-4418.

Sincerely,

A handwritten signature in cursive script, reading "Laura Pond".

Laura Pond
Paralegal, Civil Rights Bureau
Tel: 312-814-4418
Fax: 312-814-3212
Email: lpound@atg.state.il.us



Gilles Kouassi <gilleskkouassi@gmail.com>

Your Complaint Against WIU

3 messages

Pond, Laura J. <LPond@atg.state.il.us>

Tue, Apr 30, 2013 at 12:04 PM

To: "gilleskkouassi@gmail.com" <gilleskkouassi@gmail.com>

Dear Mr. Kouassi:

I have additional questions to ask you concerning your complaint against WIU. Please email me your answers as soon as possible.

- 1) What is a Unit A employee? What is a Unit B employee? Which category are you in?
- 2) Were you asked to provide proof of your level of scholarly work in the papers that you co-authored? Did you provide proof such as letters from the other co-authors?
- 3) Did you submit a videotape of a classroom discussion with your promotional application?
- 4) Were you a member of any committees? If so, which committees? Did you give additional service to the Chemistry Department other than teaching? If so, what was that service?
- 5) Who is the WIU Grievance Officer?
- 6) Have you taken your complaint to arbitration? If so, what was the outcome?
- 7) Were you ever on leave without salary? When and why.
- 8) Did you have a full workload? If not, what was your workload?
- 9) Did you teach during the summer months? If so, how many years?
- 10) Has the Chemistry Department been reorganized since you began working there?
- 11) Were your articles published in ACS certified journals?
- 12) Were there any students who complained about your accent? If so, how many students?
- 13) Are you subject to sanctions by WIU for any reason?

Please respond in the next 2 weeks if possible. Thanks for your help.]

Laura J. Pond

Paralegal

Civil Rights Bureau

Office of Attorney General

100 West Randolph Street, 11th Floor

Chicago, IL 60601

Tel: 312-814-4418

Fax: 312-814-3212

E-mail: lpond@atg.state.il.us

Gilles Kouassi <gilleskkouassi@gmail.com>

Sun, May 12, 2013 at 11:22 PM

To: "Pond, Laura J." <LPond@atg.state.il.us>

Mrs. Pond,

I just want to let you know that I am very busy grading and reporting the finals exams.

I will respond to your questions by May 15, 2013.

Thank you

Gilles Kouassi

[Quoted text hidden]

Gilles Kouassi <gilleskkouassi@gmail.com>

Thu, May 16, 2013 at 9:21 AM

To: "Pond, Laura J." <LPond@atg.state.il.us>

Dear Mrs. Pond,

Please find below my responses to the questions you asked me.

1) What is a Unit A employee? What is a Unit B employee? Which category are you in?

1. I am a unit A employee. I am on tenure-track.

Please find below the definition of these terms, as states in the UPI agreement (p.4), a copy of which was sent to you.

[39.] Unit A: shall mean members of the bargaining unit described in Appendix A referred to as employees or faculty. Unit A consists of tenured/tenure-track faculty, librarians, and counselors.

[40.] Unit B: shall mean members of the bargaining unit described in Appendix B and referred to as Associate Faculty, Academic Support Professionals, or employees.

2) Were you asked to provide proof of your level of scholarly work in the papers that you co-authored? Did you provide proof such as letters from the other co-authors?

2. Yes

3) Did you submit a videotape of a classroom discussion with your promotional application?

3. No.

4) Were you a member of any committees? If so, which committees? Did you give additional service to the Chemistry Department other than teaching? If so, what was that service?

4. Yes. At departmental level, I served in the Grade Appeals Committee, Graduate Education Assessment Committee, and the General Education Assessment Committee.

At college level I served in the Undergraduate Scholarship Committee.

At university level, I served in the University Technology Advisors Groups Graduation, and Academic Standards (CAGAS).

5) Who is the WIU Grievance Officer?

5. The UPI (Union) Chapter president is Dr. John Miller.

6) Have you taken your complaint to arbitration? If so, what was the outcome?

6. Discrimination and retaliation are not addressed through arbitration at the University level.

7) Were you ever on leave without salary? When and why?

7. No.

8) Did you have a full workload? If not, what was your workload?

8. Yes. My work load has either been equal or higher than that of my colleagues in the Department of Chemistry.

9) Did you teach during the summer months? If so, how many years?

9. I taught one month during the summer 2012.

10) Has the Chemistry Department been reorganized since you began working there?

10. I am not sure about what you mean by "reorganized". However, the Chemistry Department, like all other departments, is governed by the department criteria. The current Chemistry Department criteria are the same in use since 2008. I started in the department in the fall 2007. A copy of the department criteria was sent to you

11) Were your articles published in ACS certified journals?

11. There is no such a rule in the department criteria that a faculty should publish in ACS certified journals. The ACS (American Chemical Society) is a scientific society, and they are many of such societies in the scientific world.

Having said that, I have published in ACS journals as well as in many other journals and I continue to do so. I

believe in the universality of science.

12) Were there any students who complained about your accent? If so, how many student

12. Students, particularly lower division chemistry students, always expressed complaints about the accent of any non-American born faculty member. This point was mentioned by the DPC in one of my previous evaluations. As students progress to higher level divisions and get a better understanding of the science of Chemistry, they stop complaining about accents in their evaluation of faculty members.

Students' evaluation are different from chair and peer evaluation. The chair evaluation is based on what the chair see when he or she visits a faculty member's class. The chair evaluation is not supposed to be a comment or discussion on students' evaluation. The Chair has opportunity to address issues raised in students' evaluation in her/his evaluation of the faculty portfolio.

13) Are you subject to sanctions by WIU for any reason?

13. In 6 years of work and service at the department of Chemistry of WIU, this has never happened. Few weeks ago, I responded to an email initially sent by the Department Chair. In that email, I expressed my skepticism in the way students' evaluations are handled... I was called for a sanction meeting. The union representative, present at the meeting stated that my action should receive at most a verbal notice if necessary, not a sanction because it was not repetitive. But last week I received a sanction letter, with two-days cut of salary.

It appears that this sanction is an act of retaliation for the complaint that I made to the EEOC and to the Office of the Attorney General about the Chair's discriminatory attitude against me.

As I stated in previous correspondences, I have been particularly busy these last two weeks working on final exams and helping 5 of my graduate students writing and defending their thesis. That is why my response was a bit delayed.

I thank you for your patience and understanding.

Gilles Kouassi

On Tue, Apr 30, 2013 at 12:04 PM, Pond, Laura J. <LPond@atg.state.il.us> wrote:
[Quoted text hidden]

Gilles Kouassi <gilleskkouassi@gmail.com>

in response to your message

2 messages

Gilles Kouassi <gilleskkouassi@gmail.com>

Wed, Jul 10, 2013 at 11:58 AM

To: "Pond, Laura J." <LPond@atg.state.il.us>, "Ramirez, Carlos" <cramirez@atg.state.il.us>, Gilles Kouassi <gilleskkouassi@gmail.com>

Dear Mrs. Pond,

On April 30, you sent me an e-mail to ask a number of questions (13 questions) following my complaint (# 2013-C.RC-3062) filed on March 14, 2013 against the Department of Chemistry at Western Illinois University. In one of these questions, you asked if I have been subjected to any sanctions by my employer.

Yesterday (July 9, 2013) in the afternoon, you left a message on my phone in which you again inquired about the sanction I have been subjected to.

I would like to bring to your attention that in my complaint to the Civil Rights Bureau of the Illinois Attorney General's Office, I did not refer to a sanction, especially when this sanction did not exist at the time I was filing.

A grievance on the sanction that was inflicted after I filed for discrimination is currently being handled by the Union Professionals of Illinois (UPI-WIU) on my behalf. The first step hearing of this grievance took place on July 9, 2013 (yesterday) at 11 am. and your call for request on this matter coincidentally came on the afternoon of that same day.

I am not sure about the motivation behind your insistence in referring to a matter that is not part of my complaint.

According to the UPI agreement [of which a copy was previously sent to you upon your request], a grievance shall not be processed if the acts complained of become the subject of any other investigation in an office outside the University. It appears that your insistence to refer to a sanction that I did not have in my complaint could impede the grievance process currently under way at WIU on that matter.

I would like to stress again that I cannot discuss about this sanction with you, and I am sure you understand my position. I hope this decision will not be interpreted as a refusal to cooperate in this investigation.

If you have any question concerning the facts described in my complaint to your office, please do not hesitate to contact me.

From: Gilles Kouassi [mailto:gilleskkouassi@gmail.com]

Sent: Wednesday, July 10, 2013 11:59 AM

To: Pond, Laura J.; Ramirez, Carlos; Gilles Kouassi

Subject: in response to your message

[Quoted text hidden]

Sincerely,

Gilles K. Kouassi. Ph.D.

Associate Professor of Chemistry

Ramirez, Carlos <cramirez@atg.state.il.us>

Wed, Jul 10, 2013 at 12:22 PM

To: Gilles Kouassi <gilleskkouassi@gmail.com>, "Pond, Laura J." <LPond@atg.state.il.us>

Dr. Kouassi,

I would like to set up a time to speak with you regarding your complaint. At that time, I can explain why we would like this information as well as any other questions you may have regarding your complaint. I believe we need to have this conversation and not have it in email correspondence.

Please let me know if you are available to speak next week, as I am out of the office tomorrow and Friday. If next week is not good, please let me know what dates might work. Also, please send me the phone number where I can reach you for this call. Thank you.

Carlos Ramirez

Chief, Civil Rights Bureau

Office of the Illinois Attorney General

100 W. Randolph, 11th Floor

Chicago, IL 60601

Direct Line: 312-814-5968

Fax: 312-814-3212

cramirez@atg.state.il.us

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OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

Lisa Madigan
ATTORNEY GENERAL

November 19, 2013

Mr. Gilles K. Kouassi
137 James Drive
Macomb, IL 61455

Re: Your Complaint Against Western Illinois University
2013-CRC-3062

Dear Mr. Kouassi:

The Civil Rights Bureau of the Illinois Attorney General's office is in receipt of your Intake Questionnaire alleging illegal discrimination from Western Illinois University.

Our bureau primarily investigates civil rights complaints that demonstrate a *pattern and practice* of discrimination toward a protected class such as race, color, religion, sex, national origin, ancestry, age, marital status, military status, order of protection, sexual orientation, unfavorable discharge from military service in connection with employment, real estate transactions, access to financial credit and the availability of public accommodations. Unfortunately, we will not be able to assist you because we lack jurisdiction over this matter. This letter should not be considered a determination of the merits of your allegations or the result of any findings of fact or law.

If you believe that we can assist you with any other civil rights related matters, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in cursive script, reading "Laura Pond", is written over a horizontal line.

Laura Pond
Paralegal, Civil Rights Bureau
Tel: (312) 814-4418
Fax: (312) 814-3212
Email: lpod@atg.state.il.us