

U.S. District Court
Southern District of Florida (Ft. Lauderdale)
CIVIL DOCKET FOR CASE #: 0:11-cv-62525-WPD

Arafat v. School Board Broward County
Assigned to: Judge William P. Dimitrouleas
Referred to: Magistrate Judge Lurana S. Snow
Cause: 42:2000e Job Discrimination (Employment)

Date Filed: 11/28/2011
Jury Demand: None
Nature of Suit: 442 Civil Rights: Jobs
Jurisdiction: Federal Question

Plaintiff

Nasra M. Arafat
(previous married Ibrahim)

represented by **Nasra M. Arafat**
Po Box 772177
Coral Springs, Fl 33077
PRO SE

V.

Defendant

School Board Broward County
(Broward County Public Schools)

represented by **Marylin C. Batista-McNamara**
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Date Filed	#	Docket Text
11/28/2011	<u>1</u>	COMPLAINT against School Board Broward County. Filing fee \$ 350.00. IFP Filed, filed by Nasra M. Arafat. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Exhibit, # <u>3</u> Civil Cover Sheet)(mg) (Main Document 1 replaced on 11/29/2011) (mg). (Entered: 11/28/2011)
11/28/2011	<u>2</u>	Judge Assignment to Judge William P. Dimitrouleas and Magistrate Judge Lurana S. Snow (mg) (Entered: 11/28/2011)
11/28/2011	<u>3</u>	MOTION for Leave to Proceed in forma pauperis by Nasra M. Arafat. (mg) (Entered: 11/28/2011)
11/28/2011	<u>4</u>	Statement of: for Omitting a party by Nasra M. Arafat (mg) (Entered: 11/28/2011)
11/28/2011	<u>5</u>	MOTION for Appointment of Special Process Server by Nasra M. Arafat. Responses due by 12/15/2011 (mg) (Entered: 11/28/2011)
11/29/2011	<u>6</u>	ORDER granting in part and denying in part <u>3</u> Motion for Leave to Proceed in forma pauperis. Signed by Judge William P. Dimitrouleas on 11/29/2011. (ots) (Entered: 11/29/2011)

11/29/2011	<u>7</u>	ORDER granting <u>5</u> Motion to Appoint Special Process Server. Signed by Judge William P. Dimitrouleason 11/29/2011. (ots) (Entered: 11/29/2011)
11/29/2011	<u>8</u>	Order Requiring Joint Scheduling and Joint Discovery Report Signed by Judge William P. Dimitrouleas on 11/29/2011. (ots) (Entered: 11/29/2011)
12/05/2011	<u>9</u>	Summons Issued as to School Board Broward County. (ar2) (Entered: 12/05/2011)
12/05/2011	<u>10</u>	NOTICE of Filing: Plaintiff's Service for Document Re: <u>5</u> MOTION for Appointment of Special Process Server by Nasra M. Arafat (ar2) (Entered: 12/05/2011)
12/05/2011	<u>11</u>	NOTICE of Filing: Plaintiff's Service for a Document Omitting 3rd. Party Re: <u>5</u> MOTION for Appointment of Special Process Server by Nasra M. Arafat (ar2) (Entered: 12/05/2011)
12/05/2011	<u>12</u>	NOTICE of Filing: Plaintiff's Service for a Document Re: <u>4</u> Statement for Omitting a party by Nasra M. Arafat (ar2) (Entered: 12/05/2011)
12/05/2011	<u>13</u>	NOTICE of Filing: Plaintiff's Service for a Document Re: <u>3</u> MOTION for Leave to Proceed in forma pauperis by Nasra M. Arafat (ar2) (Entered: 12/05/2011)
12/07/2011	<u>14</u>	SUMMONS (Affidavit) Returned Executed on <u>1</u> Complaint School Board Broward County served on 12/7/2011, answer due 12/28/2011. (jua) (Entered: 12/08/2011)
12/09/2011	<u>15</u>	Summons Issued as to School Board Broward County. (jua) Modified Text on 12/14/2011. Issued per DE <u>7</u> stating to issue summons to "Legal Department" (ots). (Entered: 12/09/2011)
12/15/2011	<u>16</u>	MOTION for Extension of Time to file response to Complaint re <u>1</u> Complaint by School Board Broward County. Responses due by 1/3/2012 (Attachments: # <u>1</u> Exhibit Proposed Order)(Batista-McNamara, Marylin) (Entered: 12/15/2011)
12/16/2011	<u>17</u>	ORDER granting <u>16</u> Motion for Extension of Time. Signed by Judge William P. Dimitrouleas on 12/16/2011. (ots) (Entered: 12/16/2011)
12/16/2011		Reset Answer Due Deadline: School Board Broward County response due 1/30/2012. (ots) (Entered: 12/16/2011)
12/30/2011	<u>18</u>	MOTION to Update Court Order Based on Incorrect Input re <u>17</u> Order on Motion for Extension of Time by Nasra M. Arafat. (lh) (Entered: 12/30/2011)
01/03/2012	<u>19</u>	ORDER granting <u>18</u> Motion to Amend/Correct. Signed by Judge William P. Dimitrouleas on 1/3/2011. (ots) (Entered: 01/03/2012)
01/30/2012	<u>20</u>	MOTION TO DISMISS <u>1</u> Complaint FOR FAILURE TO STATE A CLAIM , MOTION for More Definite Statement by School Board Broward County. Responses due by 2/16/2012 (Batista-McNamara, Marylin) (Entered: 01/30/2012)
01/30/2012	<u>21</u>	MOTION to Strike <u>1</u> Complaint <i>Exhibits Attached to Complaint</i> by School Board Broward County. Responses due by 2/16/2012 (Batista-McNamara, Marylin) (Entered: 01/30/2012)
02/17/2012	<u>22</u>	NOTICE of Attorney Appearance by Michael Thomas Burke on behalf of School Board Broward County (Burke, Michael) (Entered: 02/17/2012)
02/17/2012	<u>23</u>	STIPULATION of <i>Substitution of Counsel</i> by School Board Broward County (Batista-McNamara, Marylin) (Entered: 02/17/2012)
02/21/2012	<u>24</u>	ORDER TO SHOW CAUSE re DE <u>20</u> and <u>21</u> Show Cause Response due by 3/2/2012.. Signed by Judge William P. Dimitrouleas on 2/21/2012. (ots) (Entered: 02/21/2012)
03/02/2012	<u>25</u>	NOTICE of Compliance by Nasra M. Arafat re <u>24</u> Order to Show Cause (ral) (Entered: 03/02/2012)
03/05/2012	<u>26</u>	NOTICE of Filing Propose Order for Mediation by Nasra M. Arafat (cbr) (Entered: 03/06/2012)
03/05/2012	<u>27</u>	Notice of Joint SCHEDULING REPORT – Rule 16.1 by Nasra M. Arafat (cbr) (Entered: 03/06/2012)

03/05/2012	<u>28</u>	Parties SCHEDULING REPORT – Rule 16.1 by Nasra M. Arafat (cbr) (Entered: 03/06/2012)
03/06/2012	<u>29</u>	NOTICE by School Board Broward County re <u>27</u> SCHEDULING REPORT – Rule 26(f)/16.1, <u>28</u> SCHEDULING REPORT – Rule 26(f)/16.1 <i>Notice of Correction</i> (Burke, Michael) (Entered: 03/06/2012)
03/08/2012	<u>30</u>	ORDER granting <u>20</u> Motion to Dismiss for Failure to State a Claim; granting <u>20</u> Motion for More Definite Statement; denying as moot <u>21</u> Motion to Strike. Signed by Judge William P. Dimitrouleas on 3/8/2012. (ots) (Entered: 03/08/2012)
03/15/2012	<u>31</u>	MOTION for Extension of Time to Amend and Re–file <u>30</u> Order on Motion to Dismiss for Failure to State a Claim, Order on Motion for More Definite Statement, Order on Motion to Strike by Nasra M. Arafat. Responses due by 4/2/2012 (cbr) (Entered: 03/15/2012)
03/16/2012	<u>32</u>	ORDER granting <u>31</u> Motion for Extension of Time to Amend. Signed by Judge William P. Dimitrouleas on 3/16/2012. (ots) (Entered: 03/16/2012)
04/23/2012	<u>33</u>	AMENDED COMPLAINT against School Board Broward County, filed by Nasra M. Arafat.(cbr) (Entered: 04/24/2012)
05/07/2012	<u>34</u>	Defendant's MOTION TO DISMISS <u>33</u> Amended Complaint FOR FAILURE TO STATE A CLAIM <i>or in the Alternative Motion for More Definite Statement</i> by School Board Broward County. Responses due by 5/24/2012 (Burke, Michael) (Entered: 05/07/2012)
05/21/2012	<u>35</u>	RESPONSE and Opposing MEMORANDUM of Law re <u>34</u> Defendant's MOTION TO DISMISS <u>33</u> Amended Complaint FOR FAILURE TO STATE A CLAIM <i>or in the Alternative Motion for More Definite Statement</i> by Nasra M. Arafat. (cbr) (Entered: 05/21/2012)
05/31/2012	<u>36</u>	REPLY to Response to Motion re <u>34</u> Defendant's MOTION TO DISMISS <u>33</u> Amended Complaint FOR FAILURE TO STATE A CLAIM <i>or in the Alternative Motion for More Definite Statement</i> filed by School Board Broward County. (Burke, Michael) (Entered: 05/31/2012)
06/04/2012	<u>37</u>	MOTION for Leave to File Further Facts On Defendant's Reply Memorandum In Support of Motion To Dismiss Plaintiff's Amended Complaint by Nasra M. Arafat. (cbr) (Entered: 06/05/2012)
06/05/2012	<u>38</u>	ORDER denying <u>37</u> Motion for Leave to File further facts. Signed by Judge William P. Dimitrouleas on 6/5/2012. (lk) (Entered: 06/05/2012)

FILED by MG D.C.
ELECTRONIC

Nov. 28, 2011

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S. D. OF FLA. MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. _____ - CV - _____
11-62525-CIV-Dimitrouleas/Snow

Nasra M. Arafat
(pervious married Ibarhim)

Plaintiff

Vs.

School Board Broward County (Broward
County Public Schools)

Respondent

_____ /

Complaint

I, Nasra M. Arafat (pervious married name Ibrahim) who are the plaintiff pro-se, in the above styled Cause, and as a ground plaintiff stated the following:

Plaintiff Nasra M. Arafat who is over 18 years of age and residence at Broward County Florida filing this complaint as she was employee since 2000/2001 till April 28,2010 school year as a substitute teacher Science and math / science teacher / substitute teacher at last. Plaintiff sue the defendant / employer who is educational business in Broward county Florida for School Board Broward County who presented entire Public Schools system with up to 30,000.00/ thirty thousands employees. Defendant failed to comply with the statutes for job discrimination and fair labor standards laws for equal protection when responded issued wrongful termination based on extreme false evaluations some of them from schools plaintiff never worked with.

This action is filed under:-

Section 717 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-16); Sections 12 an15 of the Age Discrimination in Employment Act of 1967 (29 U.S.C. 631, 633a); Section 6(d) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(d)); and equal pay act of 1963(EPA). Cause of action

Code # 05:0704 05:704 Labor Litigation, 15:0005 15:5(a), 15:0002fl 15:2(a) fair labor standard act & 05:7703 05:7703/ job discrimination.

Plaintiff's compliant divided to four sections as:

Material facts by EEOC with exhibits page # 7, respondent's cause of action with name, date place and description to each cause with exhibits page # 9, conclusion to the case as a whole page # 26 and the relief requested from the court page # 29 .

This matter presented direct and intentional violation of Federal Laws which prohibiting Job Discrimination. Defendant issued wrongful termination action on April 28,201 which violated Federal law for Equal Employment Opportunity (EEO): as following:-

A- Title VII of the Civil Rights Act of 1964 which prohibited employment discrimination based on race, color, religion, sex and national origin; also to secure fair labor standards and equal protection which supported by material facts as indicate by name, date and incident description with exhibits as a symbol A & B in this compliant.

B- The Age Discrimination in Employment Act of 1967 (ADEA), which protects individuals who are 40 years of age or older while the defendant / directed clear discriminatory statement directly with a threat asking plaintiff to leave job fair open for public on Oct. 05, 2010 to fill up to 400 immediate positions in this day. The new Director of instructional staffing / Susan Rockleman asked plaintiff to leave the fair as she stated { they are looking for fresh graduate}. This intentional discriminatory actions started since 2008 by reducing plaintiff's work hours and salary after plaintiff changed her married name Ibrahim to her father name Arafat as all material facts listed in this case indicated in a legal official documents / records as tangible evidences as symbols A attachments for A exhibits & B attachments for B exhibits. Defendant's action was based on false evaluations which indicated respondent direct and intentional discriminatory acts. Some evidences reflected hate crime acts and personal opinion against plaintiff without any cause of action or violation to any rules or law. Other false evaluations was written by defendant / employer's employees themselves through their own E-mail which considered public record under Fla. Stat. except as excluded by 119.071,1002.22(3)(d){students record}

C- Fair Labor standards Act when defendant failed to meet the standards of the Federal law,

state law and department of education requirements when plaintiff provided official request on Jan. 02,2010 for promotion for a new better position and salary based on her experiences, scientific educational background and the plaintiff and educational research which plaintiff integrated with her pervious science education and experiences in order to implemented her new innovation in science education. Furthermore Plaintiff earned her recent Master Degree In Education and valid Science Teacher certification in Chemistry with ten years classroom experiences in Middle Schools later plaintiff added High Schools to her list on 2007 to complete her research studies.

D- The equal pay Act of 1963 (EPA) defendant provide a promotion and different salary to other Co-worker who were performed same tasks and have same or less of plaintiff's qualifications. Defendant selected a male gradate student in my classmate during higher education studies for a higher Salary and better position. But kept plaintiff to work as substitute teacher in the classroom for \$10 an hour without any benefits or medical insurances when she requested on 2007 and on Jan.02,2010 who is better qualifications and more experiences some same qualifications but less experiences. Defendant's administration who responsible for especial programs funding to support the urban schools and especial need students ignored the facts and the reason why substitute teacher in some schools can earn \$15 an hour / \$110 a day and other school substitute teacher earning \$10 an hour / \$80 a day. The reason was this fund will benefited both the qualified substitute teacher in subject matter and student who in need for such professional assistant. But the fund goes to substitute teachers some of them who fare from the knowledge of subject matter, experiences and education because the assignments goes to sub-teacher based on dislike and like factor as these six false evaluation reflected. Defendant failed to comply with state and federal laws not only for equal pay for qualified employee but also towards students especial programs and their funds.

E- plaintiff reported the problem to administration to stop some of sub-teacher coordinators and sub-teachers department from abusing the system and their positions financially and ethically on the basis of law and factuality according to department of education rules, regulations and law as well as budget and finance in education on state and district levels. My report was not only

because I shouldn't work with \$10 an hour while I'm qualified for \$15 an hour which is available and paid to other substitute who not only less education and experiences but also they have no knowledge of the subject area or proper experiences which against the purpose from such fund. In addition these students not benefited from this funds made to improve their academic achievement and to fulfill the purpose from sub-teacher unequal pay from school to another one for same grade level. While experienced and knowledgeable substitute teacher in same subject matter will be able to continue the primary task of absent teacher's lessons and curriculum without interruption. Since 2008 the sub-central office started to choose for me which school I will work to get \$10 an hour.

F- The total for these false negative evaluations since 2000/2001 till April 28,2010 is 8 / eight letters since plaintiff period of employment. While three of them I'm never worked in their schools. Other evaluation form school who their employee committed unethical behavior when his misconduct rejected by plaintiff then he asked me to go home on April 16,2010 at 7:40 am when I asked him (please don't touch me) When plaintiff was simply asking him for the teacher classroom when I couldn't reach it. Plaintiff called her department at the district but school administrators refused to come in the phone and the district did nothing but they informed me that I will get pay even if I didn't work for this day but it wasn't the issue for me to get pay or not but his unethical behavior was. Therefore I left the school directly to nearest police station and I made a police report. How evaluation can be made on things never exist or even started at 7:40 am?. All these record and more listed as exhibits with material facts below which also indicated other official evaluation as E-mail wrote by my employer's employees who just want to block my name from working as they stated that " because plaintiff is not a good match" other stated that "because plaintiff culture " which indicated noting to effect plaintiff rather considered a personal opinion. Other indicated hate crime action when the new director who suppose to provide me with a copy from these false evaluation plus that she should review my file for promotion as well but she asked me to leave job fair open for public on Oct. 05,2010 and advertised by channel 7 news for public to attend which violated public access right and for equal protection laws.

G- Defendant failed to considered tens of true recommendations, certification for

appreciations and attendance which can't be compare numerically with these few false negative letters by defendant and form many of my employer professional staff I did work in their schools. In addition all other pervious employments as a chemist in research and developments in the biggest pharmaceutical company in US and community religious school and other communities and employers. Respondent / school board human resources record dated Feb. 03,2010 contradicted with these limited few false evaluations as their wishes to block me from working with no reason rather plaintiff is not match and because her culture. Both contradicted actions done in the same exact time when the defendant's record indicated that the system / schools keep calling plaintiff about 128 one hundreds twenty eight times in short period of time as July 2008-Feb. 03 2010 the rest of my employment work for eight continues years period was on daily bases as a full time job. While plaintiff was outside the country on 2008 &2009 for medical care. But defendant reduced my work hours since my name changes on 2008 on the time I was and became available to work which no restriction based on the position rules. Which can suppressed these few false six evaluations made intentionally to get plaintiff off from any position or job.

H- These six recent false evaluations should be disclosed to plaintiff at the time was issued while some of them was on 2006 but defendant failed to do so also later defendant failed to attached them with April 28,2010 wrongful termination nor after when plaintiff officially requested them. These false evaluations including the ones issued on 2006 as reported by schools which plaintiff never ever visit and one of them was back to year 2002 which written and signed officially by principal I'm never worked at her school. Other one on April 16,2010 when the employee committed unethical behavior and plaintiff rejected it, Two other evaluations by one school on 2008 for same day by two different people I have no business with and I did responded to it by reporting the facts as indicated in legal record from both sides and was dissolved accordingly as indicated in all exhibits attached. Other by sub coordinator who wrote word "rude" without listed any cause of action to show how and why plaintiff was rude while substitute teacher has no communication with (sub coordinator) except to say good morning and get the lesson plan. Also there was no any unethical behavior nor cause of action by plaintiff in order to cause such sudden harm to impact plaintiff's career, life time education, and experiences

just by writing few false words in few minutes.

I- In addition substitute teacher's primary evaluation must be in beginning of employment to provide chance for employees who are not qualified to work in classroom to find another position in same employer or another career but not in classroom which need specific skills, tolerance, and be able to absorb all types of stress especially working with middle schools children. Plaintiff has three excellent recommendation and priority as recommended by HRD human resources development to have full accesses and to be on call list as was the primary evaluations for continuation. Therefore my employment and education continued for long years as well as connected to my pervious career and experiences for future better position in the same field to solve problem and for improvement in science to reach the unknown universe for better life to all mankind.

J- Plaintiff provided daily recommendation to each middle school since she started working with school board especially the recent ones from many scientific organizations and from each conference I attended for global teaching and learning in Orlando and resources by my school Nova Southeastern University during my higher education studies as graduate student. In addition to best practice and blue ribbon schools national and international. Defendant adopted the uniform project after I presented as an assignment at Nova University as assignment for one of my courses and later was implemented successfully in middle schools including other disciplines rules which implemented practically and improved many schools behaviors and academic achievements according to accurate statistically record in my position. I didn't asked for rewards for this project because my focus was on science as my subject area and my entire background for education and experiences. Also because all reward should goes to Nova University, their professors and their administration. Any reward should go to Nova not because provided me this opportunity to improve teaching and learning in Middle public schools but also different opportunity to make me able to prepare all my court documents and understands the laws in assorted aspects as a pro-se in acceptable professional fashion. The wrongful termination action on April 28,2010 come after my official request to superintendent / James Notter on Jan. 02,2010 and to science department core curriculum for promotion while substitute position was

temporary position for plaintiff and other request on 2007 after I earned my Master degree in education on Oct. 31,2007.

Materials Facts Within EEOC With Exhibits

1- The charge # 510-2011-92262 was filed by EEOC Miami Florida office against plaintiff's employer Broward County School Board (public Schools) on Feb. 1st & 2nd. But on Feb, 03,2011 plaintiff amended the filling document / form by official notarized notice as **exhibit A 1** to correct wrong information including correction to EEOC form 5(11/09) dated Feb. 02,2011 **exhibit A2**. The discriminatory acts reported by plaintiff officially was for:- 1-age 2-national origin 3-religion 4-sex.

2- The director of EEOC advised Plaintiff that plaintiff must wait for six months to get any information's including a copy from my employer's response when plaintiff requested based on freedom of information act FOIA regulations bur I just got only my employer's response few days ago. Plaintiff received nothing till now except the EEOC decision titled "Dismissal And Notice Of Rights" which I received it on Sep. 07,2011 by certified mail for the decision dated on Aug. 26,2011 **exhibit A3**. While the certified mail receipt has two sides one for plaintiff's signature only the other side was indicated different name from the address on the envelope which should be match EEOC address. Therefore plaintiff has to reported it officially because the sender name on the receipt which I have to sign is for EEO which Equal Education Opportunity in my employer not EEO for Equal Employment Opportunity which plaintiff has no business with both. While 1st one couldn't provide any assistant the 2nd one only to assist teachers who has the position title. Why this certified mail receipt for signature has different address from the address for EEOC Miami office who did send the mail?. Therefore I documented to my post office and to EEOC office which take time to confirmed the problem and to receive the right mail send by EEOC which has the decision on the charge against respondent.

3- The decision / order by EEOC Miami office was supported plaintiff's case on one point of law for job discrimination but in other point of law the office reported incorrect information to the discriminations acts which never filed by plaintiff these two points in two separate parts as follow:-

(a) 1st one the order stated and clarified one essential statement to support plaintiff's

case as EEOC order ex. #3 stated that { this does not certify that the respondent is in compliance with the statutes} but the EEOC office further claimed that “they are unable to conclude the matter” in other word unable to enforce the law applications on basis of EEOC rules and federal law for job discrimination.

(b) the 2nd point in the decision **which Dismissal Of Specific Acts especially Age discrimination act when EEOC decision Linked it with entire case and added two another acts never reported by plaintiff in any record which :**

-1- Genetic Information Act.

-2- American With Disabilities Act. EEOC stated in a separate paragraphs which indicated three different acts including the Age Discrimination Act then EEOC stated that “this will be the only notice of dismissal”. Regarding Age Discrimination Act it is an issue in this case as I reported in my intake questionnaire and my amended official notarized request dated Feb. 03,2011 ex.# 2 to correct any mistake and misunderstanding occurred by EEOC office employee who checked wrong boxes in form 5 (11/09). The other two charges (other two discrimination Acts) reported by EEOC in the decision but never applied or reported by me officially in any form which is:-1- Genetic Information Act and 2- American With Disabilities. This 2nd part in EEOC decision was unclear with incorrect discrimination acts.

(c) Therefore plaintiff filed timely pleading for re-review and for reconsideration within 30 days by certified mail on Sep. 13,2011 on the EEOC decision which denied on Oct. 19,2011 order **exhibit A 4.** in order to be legally represented by EEOC in the court and / or other relief through legal department. because EEOC support statement sated that {respondent wasn't in compliance with law/ statutes}. Also respondent discriminatory action impacted plaintiff's life entirely and many lawyer refused to get involve as they stated {NO, not with Browed County}. In addition plaintiff obligated to present her self as a pro-se to defend her self, belongs, and assets which is her entire life including her divorce case, car accident case and burglary case to her belongs as all these cases pending in the court which generate very extraordinary circumstances and sever difficulty to handle them in one time. Plaintiff who has no clue or experiences to every aspect of law as she obligated to defend her self as a pro-se while is not her career or wishes to do so.

4- Plaintiff consulted with the directors of EEOC Mr./ Malcum and Mr./ Gonzales in begging of the case when Age discrimination no need for right to sue from their office but after 60 days from the date the charge was filed I can do so. But they advised me that I have to wait six months for the case to be done as a whole. Plaintiff then filed Response And Request For Re-Review And For Clarification On { DISMISSAL ND NOTICE OF RIGHTS } For Potential Referral To EEOC Legal Department. In addition plaintiff's filed a complaint to EEOC headquarter Federal Operation /Washington because of EEOC violation to the EEOC rule to assist plaintiff or provide any sort of mediation and / or reconciliation especially refusing to

cooperate with FOIA rule to provide me with a copy from my employer response as I requested or opportunity to see/ review my file the last recent one of several as indicated in exhibit A 5. But finally plaintiff received only her employer's response with all evaluations letters just few days ago and plaintiff obligated to this compliant updated accordingly.

**Respondent's Cause Of Action With Exhibits With
Name, Date, And Place Of Each Action Which Required Relief By The Court**

1- plaintiff's schedules as substitute teacher was as a full time while I was working every day nonstop without any benefits since 2000/2001 school year. Any days off I took within 10 years was limited and mandatory to attend court hearings during my divorce and my children's crises or study for my exams during my part time as graduate student for my Master degree between 2002-2007. On 2008 and 2009 during the summer vacation I obligated to go to Egypt for four and one half months each year for medical care due to car accident and medical malpractice when adequate necessary care I couldn't afford it here after my car insurances become exhausted after on going treatment and five days on hospital. As a substitute teacher we have no rule to take vacation but I always reported any absentee time through the system technology and officially but automatically the system still can call us or not through new advance technology operated by the sub-teacher department.

2- These discrimination series started only on November 2008 till April 28,2010 by reducing my work hours when I was available to work which after I changed my married name from Ibrahim to my father name Arafat. Also after I updated my education status with my employer and I started asking officially for new position and better salary in Curriculum development in science education or other reasonable a accommodation to reflect my qualification and experiences. Recently my position as substitute teacher become controlling and depended on a new advance technology system which controlling my work hours and which school the department want us to go with command from sub-central (substitute teachers department in the district to all schools). Before Nov. 2008 this reduction to my work hours never occurred for 8 straight years all of them in middle schools later I added high schools in my list on 2007 to get answer for some hypotheses on my science project based research. As sub-teacher from very

beginning my name was highly recommended based on my qualification which should be better now not vice versa. But respondent prevented me from any access to reasonable job assignments or for reasonable and fair position while sub-teacher position was temporary position for plaintiff.

3- I received instructional staffing Dep. Letter to remove my name from substitute teacher's list dated April 28,2010 attached exhibit # A6 which issued based on six false evaluations some of them plaintiff never saw .On this date plaintiff was working therefore I didn't get pay as payroll department advised that how we can pay you and there is a record you are off any position with the employer. The evaluations letters should be attached to defendant's decision but it wasn't and the decision come after my official request dated Jan. 02, 2010 to superintendent / James Notter exhibit. A 7 -A12 for promotion and also to science department regarding my science projects which plaintiff planning to implemented in science subject area for Middle Schools with other essential following dated exhibits in the case. The new innovations based long years of experiences as a chemist in research and development pharmaceuticals and medicals laboratories. while my entire education, experiences and my passionate desire always connected with science research. Plaintiff obtained her teacher certification in science, and earned my Master Degree in management and administration / educational leadership to be able to implemented her new innovations on concert foundation based on science education standards in order for young generation to achieve better life for all mankind not only for a better academic achievement.

4- These false evaluations letters never been attached with the employer's decision on April 28,2010 not only that but also must be provided to plaintiff previously at the time when it was issued while some of them issued on 2006. It is mandatory as a matter of law to know who said what where and why which must by disclose on time also must be a true not false. It was essential in my case because of pervious false evaluation in May 29, 2002 which issued by school which plaintiff never worked with because I'm never worked at any elementary schools while this school's principal did use the letter head of Broward Schools and signed false report dated May 29,2002 exhibit A13 . After plaintiff's review her record plus my employer

investigation by honest employee who indicated officially I'm never worked with this school **exhibit A 14** dated June 11,2002. Which similar to the new discovery with these new false evaluations. The different was that I'm never get a copies for these new false evaluations similar to this one in 2002 in order for me to respond which can prevented this unlawful termination while some of them issued on 2006 and 2007. Therefore this is the 1st time for me to fully respond to all of them.

5- Therefore I kept requested them verbally and officially as last request on May 21,2010 **exhibit A 15-16**. Human resources advised plaintiff that her file has been under review by new director for promotion who need more time as she new and I have not to worry about getting a copy from these evaluations letters! Till Oct. 05,2010 plaintiff received nothing. On Oct. 05,2010 there was a mandatory job fair by my employer only to fill up to 400-500 four to five hundreds professionals positions in this day at signature grant in Davie Florida as advertised in Channel 7 news for public. Plaintiff did go and did follow the fair direction based on the information I received from defendant's staff while at that time yet plaintiff didn't receive a copy from these false evaluation letters as indicated in the wrongful termination which most of them was issued by employees who has a High school diploma or undergraduate.

6- The new instructional staffing director did follow me at the fair asking me to leave the fair because as she stated that “ {we are looking for fresh graduate}”. Plaintiff informed her that human resources advised that my file was under review for a new position / and or promotion therefore I'm here I added also “if this the case and I have to leave then why you didn't provide me with an answer to seek justice instead of waiting or coming here especially my request for a copy from the evaluations letters was since April 28, 2010 formally and informal which must be attached to the decision in the first place?. The new director threaten me that if I did not leave the fair she will call the police because as she stated that {she has no any job for me}. When I tried to walk in order to talk to north area superintendent or any responsible administrators in the fair especially who knows me and other who just give me paper work and asked me to follow the fair direction and to fill any form and application they provided. But she continued following me and prevented me by calling security. Plaintiff contacted the district who advised me that staff

personal at the fair.

7- knowing and reviewing these evaluations was a critical primary factor in the case based on the pervious false evaluations on May 29,2002 as listed in ex.# A8&A9 and other one which was dissolved based on my response and record to indicate the fact. But the new discovery was defendant added evaluation never seen by plaintiff to be a part from these six evaluation for wrongful planed termination. Only after 5 months when I attempted to get them as a matter of law to know what caused this harm to my long professional career and education. Also after the instructional staffing director / Rockleman action occurred on Oct. 05,2010 which asking me to leave the job fair open for public at signature grant. knowing and reviewing these evaluation was critical and the core of the subject matter as was new discovery when another two evaluations issued on 2006 and never provided to plaintiff but considered with these six letters for intentional discriminatory action in. In addition plaintiff knows what she did since she started her job on 2000/2001 till now.

Therefore how we can make determination on false or true question without knowing the question?. Even if sub-teacher have to sign form stated that {three or more negative letters then the sub-teacher name will be removed from sub-teacher list (sub-teacher position)}. But must be legally proven to be true as common sense if is not even required by law. But at the end of the day statement does not also stated that from the entire employer but stated that “from sub-teacher’s position (list) ” when the position limited to be in the classroom only while varieties of job opportunity available at different departments, positions, and buildings in this particular employer. Which in contrary to any other employers in US which occupied with all labor levels and salary started from minimum wages to highest one which similar to the presented of USA. Nevertheless the question is if these evaluation letters true or false?. Also was provided on time for employee’s to response or not? In addition this kind of evaluation for this particular position it must be conducted for termination purpose in the very beginning to alarm the employees to change their career away from classroom setting while there is another varieties of positions and departments always has job opining. But plaintiff has excellent three of them when she started which allow her continuation 10 years in the classroom.

8- My expectation was fully correct when the new evaluations letters which I'm never seen before until after Oct 05,2010 some was issued by schools I'm never worked with. Also I'm never informed with these false letters before which issued on 2006 and written by Basketball Cheerleader at Nova high school on Oct. 18,2006 **exhibit 17. I don't know what Basketball can do with science. Also I don't know this person or worked in her /his school as never** which will be presented at trial. The other one evaluation also from Cypress Bay High school stated that **plaintiff Nasra is not a good match with her school** but plaintiff did not request to work in this school on 2006 as was issued on Oct. 31,2006 **exhibit A18** by sub-coordinator / Monica Arismendi . Plaintiff doesn't know any rule or law in USA can be follow to get plaintiff be match and to what? in order for her to work to be able to repay her student's loan as \$103,236.58 **exhibit A19** and her living expenses. The most important issue in these evaluations **ex.# A17 and ex.# A18 which** dated on 2006 while plaintiff didn't work nor requested this school on her list including any High school till 2007. Plaintiff experiences since 2000/2001 school year till April 28,2010 was with Nova Middle school where plaintiff exercised her specialization in her subject area which reflected her qualification and she was teaching science for advance classes.

9- The negative false evaluations issued by Nova high school which plaintiff never visit till end of year 2007. While there was no negative evaluation from Nova Middle where I did work most of the time neither from the rest of almost all middle schools for long years. But it was a positive recommendations letters with appreciation certifications, and for good attendance from most of Middle school I did work with **exhibit A20-A23 as sample only provided.** Even if more than that nevertheless it is false and generated from personal opinions without cause of action by plaintiff but vise versa against plaintiff. Also these two particular evaluations from total six never disclosed to plaintiff before for response till after Oct. 05,2010 after the hate crime action on this day at the job fair. Respondent didn't take action against these employees who has no right to evaluate me when plaintiff never worked at their school rather respondent considered a false evaluations to get me off my job. In addition defendant prevented me from any other opportunity in another position at another department or employer which caused sever injustice not only for violation to federal laws prohibiting job discrimination but also for equal protection

when another type of hate crime to harm plaintiff and her career with no reason but hate.

10- Other schools the sub-coordinator wrote in her evaluation that (Plaintiff was rude to several people while there was no communication with any people and without any cause of action by me to indicate such description about plaintiff evaluation on Dec. 05,2008 West Broward high school exhibit A24. While in this date I did work as mediator between the first class students and the administration who refused to connect technology as directed in the teacher's lesson plan to me on Dec. 05,2008. The issue was between students and administration who provided another lesson plan when technology department informed me that no net work connection will be made and no video will be seen. But was directed in the teacher's lesson plan to me when I tried to operate the system to start the video which included in the content of the lesson plan as I listed on the board before the class started. Therefore another lesson plan provided by the office when students knows previously from their teacher about the plan as a continuation and application to their pervious studies to take note as review for upcoming exam. Plaintiff also provided another solution to student if they don't like to do the new assignment given by the office by using their text book to review same knowledge and I explained to them how to tolerate, accept and make adjustment to unexpected circumstances undesirable for you to move on with our daily life any where. Sub-teacher or even teacher can't enforce students to do their work but they do their best through many different instructional methodology, martial available and other types of influences and engorgements. Nevertheless it is not our issue in this case the issue is there was no any evaluation proven to be true or there was any cause of action done by plaintiff nor any violation to any law or rule but vise versa against plaintiff by six employees from 30,000.00 while plaintiff was visiting all public schools except elementary schools.

11- I'm only demonstrate the lesson plan provided by teacher in her/his absent according to his/her materials content provided to me, or by department head for emergency lesson plan or by the office as it happened in this day. In addition I provide assistant for students to their work and answer any question. But why technology refused to connect the net work I have no answer for it and it not my personality to say something about things I don't know. Therefore students refused

it and asked me for pass to go to administration which I did when you are dealing with adult who asking me why we have to waste our times while there is an assignment must be demonstrate on Dec. 05,2010 to take notice for upcoming exam. How to follow the rule and teacher's direction and providing assistant for varieties of needs to all students was my practical and useful methodology based on my experiences for long years this what I'm doing since 2000/2001 school year. I don't know how and why I was rude on Dec. 05,2008?. Another E-mail as 2nd evaluation on same day from same school which to increase the number of negative false evaluations to take advantage from sub-teacher rule position to end my employment intentionally while the statement to be sign by sub-teacher stated that " if three or more can remove the sub from sub-listed" is not law or rule can effected employee other position and the issue is if is true not false. The 2nd one wrote by another employee that {my personality does not suit this school's students...} **exhibit A25** . It was slur and personal options without any cause of actions which never reflected the fact. While this class was American history class which means there was no communication while I wasn't teaching science as my subject area. Furthermore there was no response from the school or the district in my report as response to these two evaluations on one day on Dec. 05,2008 ex.s # 24&25. This one evaluation I got on time and my response exist in district file and to was end to this school as well which was dissolve accordingly.

12- The following evaluation which essential one in this case which issued by same employee later after he committed unethical cause of action against plaintiff on April 16,2010. In my case unethical behaviors and misconduct was committed against me but no action was taken against this employee who wrote what he want on April 16,2010 **exhibit A26** evaluation and after police questioned him who asked me to go home not working because I asked him "please don't touch me". Plaintiff was simply asking him for direction to the teacher's classroom at 7:40 am on April 16,2010 when there was no map provided by sub-coordinator. After I called the district the school administrator refused to come to talk to my department who advised me that {plaintiff will get paid the \$80 even if I went home and I didn't work this day}. But this wasn't the issue rather it was his unethical behavior then his following threat and prevented me from working after I rejected his behavior with respect to let him know that what he did is not acceptable in order for plaintiff to be avoid similar further behavior or to be prevented from happening again

but he didn't appreciate that. Therefore plaintiff left school directly to police station and I filed a police report when my employer did nothing for such unethical behavior and unfair and unequal treatment inside educational institution police report exhibit A 27 with attachment which his evaluation ex.# 26 Plaintiff's question is if there is a punishment who will should go home or face consequence of law or disciplinary action?

13- There was no response after I reported such negative behavior against me at North East H.S on April 16,2010 while it is understood he can't do what he is done not only because I have scarf on my head but also because such unwanted behavior is prohibited by law especially at educational institution. My request for relief from my employer was not to sue this school but to reserve the right and dignity of all employees equally and fairly according to the law. I obligated not to go home directly when nothing was done but I obligated to go directly to make a police report to report the incident as a part of my duty towards any other matter not only mine at any school according to department of education and district rules. Also any administrator refused to come on the phone to talk to my department to solve the matter peacefully with respect when I contacted them immediately from the school office after this negative behavior. Furth more when he asked me to go home before I report to the classroom or see any body in the school at 7:40 am. How even they can evaluated me or judged my performance on things never exist ?. The law was broken , the value for education ignored and people career and experiences was underestimated by these few individuals with comparing with a hundreds of different schools I visited for long years who rewarded me with excellent evaluations and certificate of appreciations and perfect attendance.

14- The following false evaluation as was issued on April 13,2010 exhibit A 30 by Henry D. Perry Middle school sub-coordinator who just listed one bad word which ""rude"" without any cause of action done by plaintiff then asking to put my name on don't call list. It was 1st time to see this new sub-coordinator in April 13,2010 during many times when I did work in this school there was another sub-coordinator while my task never changed. Also we have no communication with them sometimes we didn't see them during our report to sign in while many of teachers leave all information at front disk or / and in recorded message in automated line. My

respond to all these false evaluation in this compliant with exhibits as complete response. Other false evaluation with no reason at Coral Glades Middle high school evaluation never provided to plaintiff on time for response which done on March 02,2007 and writing report in March 05,2007 by Sub-coordinator / Judy Berman was when she asked me for my driver license to make a copy I informed her that I have to ask my department sub-central at the district first who are open daily at 6:00 am. My concern because was new request by this school since my work on 2000/2001 school year and there was no notification for us about such request to make a copy. I don't know what the crime plaintiff did commit or what violation of law is it? Therefore another false evaluation issued by this sub-coordinator **exhibit A31** Coral G. H. The 1st response to the six evaluations was after I received what my employer send to me after Oct. 05,2010. Therefore I did send my written response to my employer dated Oct. 29,2010 **exhibit B1 / attachments B based on what I got after Oct. 05,2010. while complete response to entire evaluations since plaintiff started on 2000/2001 till the wrongful termination on April 28,2010 explained in this compliant as total and final from EEOC which all eight (8) false evaluations some of them I'm never worked with and other never exist or never provided to me on time for response or plaintiff did response and dissolved.**

15- It is understandable that sub-teacher signed paper that after three negative evaluations or more will take her/his name off the sub-teacher position which must be in very beginning working all over the schools which plaintiff already got all her true rewards evaluations in order for continuation in class room and approval by HRD (human resources development) and by other professional as a samples back on year 2000/2001 **exhibit A 33-A41.** Therefore plaintiff's qualification and performance by now should be better not vise versa after plaintiff earned her M.S in management and administration educational leadership, teacher certification and all other certifications and recommendation as new ones listed including my updated resume **exhibits A42-A47** also a sample as ex.#20-23

The primary essential questions now is it is true or false evaluations? it is a hate crime involved or not? The plaintiff as employee informed with each evaluation on time or not? And what the out come of the plaintiff 's response ?. Is it the fact of cause of action was misconduct, bullying,

personal opinion and hate act or indicated what else?. What action the employer did take when there was evaluation by three schools plaintiff never visited?. What the cause of action by plaintiff was when other employees called her plaintiff name in her face with no reason at Perry Henry Middle school on April 13,2010?. Is it true plaintiff or any employee can loss his/her job because she is not match or because of culture differences or not match to some schools student's suit? Can changes clothes, do wrong things and compromised against innocent people and children's life and futures or not will satisfied these few employees? There is any other department plaintiff can work as a accommodation while plaintiff couldn't to be match nor can't change her culture I don't know what culture they are talking about in their letters while since I started working my personal status, my attitude, my culture remain and will remain the same!.

16- All these questions is critical factors in this case which was ignored by defendant because it was intentional discrimination and planned action for wrongful termination after plaintiff asked for reasonable position and fair salary to reflect her new higher education, teacher certification, and long years classroom experiences. In this case there is students loan which become double which now reach \$103,236.58 ex.# A19 in addition plaintiff become homeless and needy for necessities for living. Therefore immediately I wrote to my employer seeking help when the new director's action take plane on Oct. 05,2010 which impacted me emotionally because it was 2nd sever misconduct and negative behavior action by respondent after April 16,2010 incident for employee misconduct against plaintiff. This 2nd time was inside job fair open for public in present of hundreds of people as was advertised by Channel 7 news and after the new director staff influenced me that my file was under review since April 28,2010 decision for new promotion. Also to give me a copy from these unknown evaluations which it become mandatory and a matter of law, when the action was nothing but a hate crime act and underestimate for other people personal life, education and career to prevented them from living the life they deserved for their hard work and studies which protected by law for equal protection.

17- It was not just discrimination acts rather it was sever ignorance for sense of humanity in advance civilization societies and disrespect and underestimate to other people valuable education, resources and knowledge of experiences especially in educational filed. These few

individuals missed the point from educational filed meaning which to fix people and provide every opportunity to make the change in each human begin life as one human being family. While asking any body who are looking for better life to leave job fair open for public is not reflected the missions and provisions of any educational institutions when the qualified person who she / he deserve full right for reward and for better life. This irresponsible employee asked plaintiff to leave after plaintiff received the paper work and I was directed by the staff to follow the line while there was hundreds of people presented. While most of other staff who were conducting the hiring process knows me and provided me before with appreciation certificates and recommendations when I started to work and after . The new director has no ID and refused to show me her identify when I suspected her action because she should knows me from my file as her staff advised me that it was under the new director review. Then she better know me from hundreds of pages to reflect my qualification, education history with recommendations, appreciation, attendance and more from other employers and background checks and more if they were telling me the truth. Therefore plaintiff deserve position not less than the new director if is not better. Plaintiff providing only a sample with this compliant including my resume with other certifications as ex.# A 42-47

18- I'm never committed or convicted with any sort of crimes or acted negatively against any body any where and my teacher certification approved after up to 7 months investigation and finger prints and by FBI especially for entire court record related from court directly to Tallahassee to my divorce case as conclusion to all record indicated in exhibit A 48 while any allegation done by plaintiff's ex-husband during my divorce which never stop even till now while I was victim of his crime. This discriminatory action prevented me from getting any job especially at this difficult time when there is no job available at other employers but it was and always available in my employer while there was already up to 400 positions on Oct. 5, 2010 must be filled on the same day at the district for urgent job fair especially in science as shortage area. In addition to all other varieties of different departments not only science teacher positions who always have opining. Defendant / employer was traveling to another states and country to retain science and math subject areas which plaintiff already have plus Florida teacher certification in Chemistry and statement of eligibility for general science. District who compliant from financial problem will pay more fund for these new comers for relocation and for them to

get their certification in Florida. When plaintiff has a full qualification including long years experiences with same employer who in need for science teacher as a shortage areas when science is the heart of every human being's life.

19- The decision dated April 28,2010 to take me off from my current position unfairly and paralyzed me from getting job at any other places was based on these false six letters plaintiff never seen or issued on 2006 or plaintiff never worked in their schools. The defendant action was extreme wrongful termination which occurred after my request for a better position and salary (promotion) to superintendent on Jan. 02,2010 and other request since my graduation on Oct. 31 20007 to instructional staffing after updating my transcripts while the pervious director failed even to response **exhibit A 49** . Also for any other accommodation especially after my B.S. in science and M.S. in management and administration which can manage different other positions and department in same employer. My request was reasonable and fair obligation protected by law to reflect my qualifications and experiences for 10 years with same employer. Also instructional staffing and human resources continued to convincing and influencing me that they will investigate the issue and they will send me a copy from these false evaluations letters and they will review my file for (promotion) till the fair on Oct. 05,2010 when the new discovery indicated something else for another new horrible hate crime. While plaintiff request was very simple and easy to handle by granted or denied my request to let plaintiff move on and seeking justice I didn't enforce respondent to provide fair salary and position but I asked for a copy from evaluations required as a matter of law. But after all these false allegation and false advices by the new director's staff and without knowing about these evaluation letters in order for plaintiff to take further step to protect her career. They left plaintiff paralyzed waiting as plaintiff trusted them till the discovery of the Job fair on Oct. 05,2010 and all promises was untrue and made to pass the time to file charge but God guided plaintiff at the right time.

20- Their excuse for delaying any response or send these evaluations letters was because human resources stated that {the director Mrs./ Becki Brito who wrote the termination decision on April 28,2010 is no longer there} and the new director Mrs./ Susan Rockleman is busy while the new school year 2010/2011 started on August, 2010 and she is overwhelming and she will review my file to solve the matter}. But plaintiff still need a copy from these six false letters

wither they will review my file for promotion or not. The pervious director made the decision on April 28,2010 when plaintiff was working on this day. Therefore payroll department couldn't pay me for this day I did work. In facts these 6 / six evaluations letters not only false but some defined others facts to indicate a hate crimes as some of them stated that {the plaintiff not a good match or because culture to work in their school} which prohibited by law on basis of national origin and race. Other just want to block my name to stop me from working which will effected my future position by taking advantage from the system and sub-teacher's position. While what they have is only a title while plaintiff deserve better position more than the most of these employees who wrote these false evaluations which only defined their personality then turn to be supportive material facts to plaintiff's case. When conspiracy committed against plaintiff indicated in their E-mail which it become a public record and release by other employees which later indicated such intentional discriminatory acts.

21- Without channel 7 news about this job fair; plaintiff will never reach such achievement to know about this plan for intentional discriminatory action just because plaintiff rejected unethical behavior. Therefore I have to go home and not working even at any other position in employer with 30,000.00 employees and with all types of positions and buildings for different separate many of administrations and schools buildings all belong to one district.

These employees used their employer's technology who controlling the job assignments as they were planning to block my name from getting job by taking advantage from the rules and misusing their position. While plaintiff not less experiences and education but vise versa and her position was as temporary till finishing her education and other personal circumstances especially after her graduation on 2007 due to car accident. Furthermore I didn't know about these six false evaluations which must be attached to my employer decision or must be send when I requested but I got them after 5 months later. But by God guidance I was able to file the charge after I attempted to get these evaluations as a matter of law while my employer considered them as the only reason for this wrongful termination. There is no any other record against plaintiff from my employer or from any other resources.

22- These evaluations wrote by sub-teacher's coordinator who less qualifications and

education which reflected only her personal opinion not evaluation to my job performance and not reflected my attitude or my personality values. Also all visitor teachers has no time for any sort of communication except few minutes to report and to have the lesson plan then rush to classroom. While there was no any cause of action by plaintiff or any violation to any law. These few individuals negative acts on contrary to what we are teaching our children about tolerance, respect and value one another believe and differences and prevented bullying, harassment and discrimination especially at pure diverse educational institutions and country. Also prohibited by state and federal laws. These set of laws which ignored by some individuals is the only effective practical methodology to be enforced which make this country strong and unique country.

23- The change we are all looking for will never be exist for our today trouble and rapidly changing world without taking responsibility to enforce the basis of our treasure law which on other hand will motivated people to address the inhumanity or slavery practice in each form and to eliminate the fear from losing job opportunity when wrong doing and compromised must be rejected to insure better and prosper life for all man kind. Law application is only tools to encourage and motivate all people to not accept wrong doing. Plaintiff not aware about any other records in this case or any other cases against her and she never confronted with any wrong doing or negative record against her from any agency or individuals which can revoke my teacher certification or affect my career by any way. These false evaluations has no any affect on my teacher certification which I did obtained after full background check, FBI, finger print and all other investigations required and done within and according to all rules and laws as ex.# 44.

24- Plaintiff's full record provided and exist in the district file as well as in Tallahassee department of education file which indicated my caring to my children and to all other children who have to suffer plus losing their future, health and education because of assorted barriers. It is my responsibility as a biological mother and / or teacher to take risk by preventing wrong doing and to do the right thing in order to protect innocent children's future, health and accordingly all man kind which indicated in my file in the district. One of most important record exist in district file is one example from many facts when plaintiff refused to compromised with wrong doing in order to keep her employment as 7th grade science teacher on 2005/2006 school year at the time

she in need for better salary and full benefits especially medical insurance as listed below.

Example for my employer history of discrimination just because plaintiff refused immorality against innocent children

(a)- I offered a science teacher position in 2005 by a middle school principal; I wasn't ready to have it but I accepted to administrate a part of my research in science education while as a sub I have no many of timely obligations and responsibility including access to science labs which closed storages with tremendous tools and scientific equipments never used including expensive microscopes in their plastic bags as a brand new but covered with dust. I reported all facts and provided feed back. These points was previously reported in my project which how we can use this space and these tools with no costs to expand and apply life and space science according to science education standards to provide true opportunity for these young generation to explore and to discover unknown universe. The second matter is teaching 7th grade science curriculum for my students who their academic levels reflected 2nd elementary mentality / and or academic level many of them has no even any idea about basic science as I know this facts previously when I visited all academic levels.

(b)- Therefore my focused is to prepare and implanting my project in science. I refused to do as some teachers does when I become a responsible teacher about these students education and grade in each semester also to complete my research accurately. I started to administrate the correct curriculum and teaching style to cope with these students need. I used a basic science books and specific **specialized reference books** plus specific science dictionary as collections materials from different resources I bought it in my own expenses during my journey in science educational filed. In addition I was working over my hours staying late every day in order to make copies for 120 students daily from assorted scientific books to accommodate their need and academic level plus spend half of my salary to buy materials as I made full changes to apply basic science practically in a groups. On other side I did spend my week end to contact parents and set an appointment with them I wasn't surprise after I meet with them when I find out that most of them foster parents and others who facing different barriers.

(C)- I accepted a full responsibility to start from very beginning in order for them to catch up step by step in following years to prevent the cycle which will be end with no achievement / and or low achievement in high school. When I asked for help and permission to make the changes officially while I have to demonstrate different assessment based on the basic curriculum I provided not regular 7th grade science. But the answer by department head that I have to follow 7th grade science even if is not effective and students will fail but I have to pass them any way which I refused any other option but to improve teaching and learning and provide suitable curriculum based on students academic level and mentality not current grade level. Therefore I switched to sub-position when I Enforced to leave on 2005/2006 school year. All these record exist in the district file as a fact when plaintiff refused to compromised not to effected students future but it will be all mankind future which will increase hunger, diseases , pollutions, suffering and injustice in our temporary life as living organism.

25- my employer continued to violate the law when I requested verification of my employment on Jan. 01,2011 for a basic personal information. My employer provided wrong information about me while there is somebody who carry same my last and first names also working in same filed. My employer personal record failed to provide what required by law after my request to fix incorrect and incomplete information exhibit A52.

This discriminatory acts come after working hard and study harder for a better prosper life while there is student's loan which become double as reach \$103, 236.58 one hundreds three thousands dollars &two hundreds thirty six dollars and fifty eight cents ex.# A 19 . Plaintiff have no any resources except my valuable education and long years of experiences with this defendant employer and my all resources is spousal's support as \$ 727/ month. This damages results of such discriminatory acts by few individuals while the job opining was available in many of different areas and fields in public schools. If defendant rejected me from very beginning plaintiff might change her career for medical technology or other of her related experiences as professional and this loan will never be established.

26- Defendant action asking me to leave job fair and stopped the hiring process at signature grant Fort Lauderdale on Oct. 05,2010 was direct discrimination act against entire civil right laws which protected public access right as separate step while following ones up to the staff for hiring. New director's action was to eliminate my present in the job fair while the complete hiring process and decision in this day operated by many schools staff members who positively evaluated me for long years. My employer didn't considered the facts for these schools who appreciate my work and attendance nor my education and qualifications with valid teacher certification and Master degree in management and administration for educational leadership. This action enforced respondent to send these false letter and after I send my urgent emotional message next day on Oct. 06,2010 exhibit A 54. Plaintiff in these exhibit wrote her name mistakenly wrong as she only heard it by her staff as never formally presented to plaintiff.

27- The delay was to let me lose my right to file a charge according to the time limitation statute to file charge. My employer has a full responsibility about these few individual's staff

personal opinions and the unethical behaviors on April 16,2010 against me without any cause of actions by plaintiff but vise versa. When I was simply asking for direction to the classroom to do my job on April 16,2010 but they enforced me not to work while their behaviors prohibited and punishable by law. My employer did nothing rather was wrongful termination to plaintiff who was a victim of crime which punishable by law under providing false information to authority and cause harm in free harm societies law provisions. Their evaluation letters defined their personality and it can't justified such wrongful termination to plaintiff while there was no cause of action by plaintiff or any violation to any law.

28- Plaintiff qualification and long years through diversity environment with assorted differences assisted and equipped her with tools to be able to response, tolerate, to react and to accept all other people opinions and differences which plaintiff was handling any problem based on understandable clue about what is human begin is and what its our life all about!. My experiences was fascinated one with schools board because it was a research studies for me which assisted me to build concert foundation for useful science projects for talented and especial need students as well. In addition to all other assorted recommendation I provided to each public school I visited from all Global Teaching and Learning Conferences conducted by Nova Southeastern University in Orlando Florida and other scientific organization like National Science Teacher Associations NSTA and many others. My experiences wasn't just sub-teacher for me it was priceless experiences which all about how to operate the education system as a role model not only academically but with value generated from our old golden rules as one human begin family which where to shape all creations as a advance civilization not vise versa.

29- Therefore plaintiff must respond and must stand even if by her self against any immorality action at any time any where. In addition plaintiff simply was refusing any form of slavery any where. Defendant has two different departments should assist in this matter and to provide reasonable resolution and fair accommodation. But assistant was declined by EEO which is for Equal Education Opportunity because is not related to this case for job discrimination as they informed me while the other department which carry same privations as EEO but different word and meaning which for Equal Employment Opportunity. But they informed that plaintiff as substitute teacher position has no union and they helping only teachers

as a title while plaintiff was performing same task as a teacher with valid teacher certification and long experiences; But my employer failed to change the title because the salary will be changed accordingly. Respondent want to keep me working but as slave in United States Of America. Therefore when plaintiff provided her official request for change then defendant stripped her from even her current position as sub-teacher and from any other reasonable and fair position plaintiff in title for by law.

30- What plaintiff got when she started to take step to obtained and protect her right to be treated equal is to become a homeless and to be on food stamp as \$161 / a month as \$5.4 / five dollars and four cent a day and no housing available from social services in USA at this time. While plaintiff has B.S. in Science, valid teacher certification in Science, M.S. in education and up to 10 years classroom experiences with tens of excellent recommendation / evaluations, certificate for appreciations and perfect attendance and most of all never committed or convicted with any crime rather plaintiff always follow the rules and never break any law. Is this what the future generations' life will be?

And if the law is different from state to another is FEDERAL-STATE RELATIONSHIP can be change better than SEC. 633. [Section 14] (a) Federal action superseding State action in age discrimination Act or others Acts; when defendant cause of action was intentionally malicious and unfair to cause unnecessary harm. When the reason indicated in employees' E-mail and reflected in their action how they behaved against plaintiff with no reason

Conclusion

Plaintiff has no body represented her or acting in her behave in this matter or any other matter. Plaintiff has no any type of agreement with any body nor plaintiff signed any sort of agreement with any body, agency, community, individuals or any employer.

A- The EEOC Equal Employment Opportunity Local Office decision provided support statement as stated that { this does not certify that the respondent is in compliance with the statutes } but the EEOC office further claimed that {they are unable to conclude the matter} in other word investigator unable to enforce the law / and or to adopt the case for relief. The investigation simply was

clear admission that respondent violated the statute for federal job discrimination law.

B- Defendant denied public access right which protected by civil right law during job fair open for public which advertised by Channel 7 local news by plaintiff's employer / defendant who are the number six of largest schools district in USA. Respondent failure to enforce the law and code of conduct against some employees who provided false evaluations and proven to be legally false by respondent in 2002,2006, 2007,and 2008. Respondent caused encouragement for others who has same desire to expand their misconduct against plaintiff to another level to be a physical act while respondent same failure not only remain the same but also failed to provide a copy from the entire evaluations as required by law rather respondent unlawfully and wrongfully issued termination on April 28,2010 not reflected the provision of sub-teacher position ruling for termination and plaintiff's right for fair and reasonable position where she was seeking based in her qualifications.

C- Defendant failed to proceed with accordance with the law by considering false evaluation from places plaintiff never worked with nor applied the law consequences against school employees who provided information proven to be false which punishable by law under US Code § 3729 **false claim as indicated in (a) for liability for certain acts (1)(B)**. Also defendant failed to take action against other employees who committed misconduct and unethical behavior on April 18,2010 which could prevented further falsification and negativities by enforcing the district and law code of conduct.

D- Defendant considered false evaluations issued on 2006 but never disclosed to plaintiff for response even when plaintiff was requested later after till Oct. 05,2010 and after the wrongful termination was done on April 28,2010 and plaintiff a temptation as a matter of law.

E- Defendant failed to comply with the Fair Labor Standards Act to provide equal salary as \$15 / hour for plaintiff current position paid for other sub-teachers or reasonable promotion or any other reasonable and fair accommodation when plaintiff officially requested in writing on basis of law. But defendant attempted to keep plaintiff working in classroom performing teachers' task with \$10 an hours without any benefits while same classmate as graduate student offered promotion when both gradated in same times. In addition to plaintiff's factuality of her qualification for B.S. science, Valid teacher certification science, MS in management and administration / educational leadership and up to 10 years experiences in classroom. Defendant other employees with same qualification who were selected paid \$35-\$50 / hour with full benefits.

F- Defendant failed to accommodate plaintiff on basis of equal protection clauses and fair standards

labor while varieties of positions available at different administration and schools buildings to reflect plaintiff's qualification reasonably as follow:-

(1) Defendant action on April 28,2010 was wrongfully applied in this case because Even if sub-teacher have to sign form as defendant stated that {three or more negative letters then the sub-teacher name will be removed from sub-teacher list position} it does not say that from any other position nor to be terminated period without identify the position. The most critical factor in this case or other cases it must be legally a true not evaluations.

(2) Sub-teacher's position limited to be in the classroom only to give a chance for unqualified sub-teacher to change the position. Therefore stated the removable is from sub-teacher list if the evaluation is true as a matter of law. While varieties of job opportunity at different departments, positions, and buildings is available in this particular employer with up to 30,000.00 employees as six largest schools district in the Nation which in contrary to any employer in US while occupied with salary started from minimum wages to highest one similar to the presented of USA. This kind of evaluation for this particular position it must be conducted for termination purpose specifically from classroom as stated sub-teacher position in very beginning to alarm and provide chance to employees to change their positions away from classroom. Plaintiff has excellent three of them when she started which allow her to continuo for long years in the classroom and encouraging her to seek higher education in same field in general not only classroom setting. Nevertheless plaintiff's positive evaluations continued and recent false evaluations proven to be not only legally false but indicated misconduct and hate by few individuals. **Respondent failed to balance critical equation by considering false evaluations come latter after even years but ignored the material facts for many in addition to plaintiff's recent higher education and long years of experiences in critical subject area. Plaintiff science project for young talented children not to improve students scores but to solve our assorted problem at limited measurable planet in this unknown universe to over come hunger, homelessness, new diseases and pollutions.**

G- Defendant cause of action was crystal clear and become a matter of law when school employee asked plaintiff to go home because she was simply refusing improper behavior. Defendant failed to follow the district and department of education laws and regulations for proper action against their employees nor provided any type of reasonable and friar reconciliation. The discrimination acts indicated in these six employee's misconduct, discrimination statements to not accept plaintiff to work because plaintiff is not match, her culture and she is not suitable suit for school's students and others as personal opinion not related to plaintiff performance or personality which reported in their own words in their E-mail or in the

evaluation forms while never disclosed to plaintiff.

Plaintiff followed the rules and laws in each aspect and I did not refuse to be compromised with anything wrong. There was no indication nor admission to any guilt or to any violation to any rules and / or to any law from my side ever since I started working till the last day on April 28,2010.

H- My education and experiences it didn't cost me only money but something else can't be described or valued by money rather priceless senses and feeling for our life as human being as essential factor necessary to build advanced civilizations accumulated through very long journey and long years within values, beliefs, care and proper education. In addition to assorted sacrifices by my parents to raise me with value to reach the top of college education level at the time was difficult to obtain such education even for males not only for girls in Egypt but also in many places around the world. In addition to the following sacrifices by myself here in US to gain knowledge and experiences during very difficult time in her life for divorce and her biological children crises and care for others in first place which money can't replace.

Requested Relief

Therefore: plaintiff respectfully requests adequate relief within the law for equal protection clauses to repair these damages caused by defendant as follows:

1- Defendant's employees' action asking her to go home and another one asked her to leave the job fair with threat to call police inside public place full with hundreds of people. While plaintiff not less than others who were selected which caused severe emotional abuse which caused plaintiff to suffer mental anguish and slow her focus and ability to move for few days (stroke) and changed her life. Therefore plaintiff seeks compensatory and punitive damages.

Plaintiff demands an amount of \$300,000.00 three hundred thousand dollars on basis of EEOC law and rules Financial Guidelines to recover from unlawful harm caused by employer with up to 30,000.00 thirty thousand employees.

2- Defendant intentionally refused to select plaintiff who has primary right for promotion than others. Therefore plaintiff seeks placement in the job and back pay award and benefits the plaintiff would have received similar for those who were selected for the positions was available and defendant intentionally refused to provide it which is \$35 dollars an hour as just and fair as a full time employee since April 28,2010 plus financial replacement to full benefits plaintiff

could have if was selected.

3- Defendant caused irreparable emotional and financial harm since the wrongful termination which impacted plaintiff as professional and educated employee which make her homeless, losing benefits which effected plaintiff from proper access to medical care, and access to adequate nutrition spending time and energy looking to secure shelter and to find a job.

4- Plaintiff spend her precious time on her research studies to benefited respondent with valuable recommendations which more valuable than the higher education student's loan as \$103,236.58 which not paid yet . When all recommendations and science projects is priceless and plaintiff should retain the right position in order to present it and the implementation will be up to department of education. But reasonable accommodation to retain reasonable and fair position as was requested to be award by this court power. Respondent has a full responsibility to pay this loan in full while certified teacher with position titled teacher only in shortage subject area for science or math has a full forgiveness to entire student's loan but respondent declined plaintiff's right to get the title while she was already teaching her subject matter successfully with less advantage title.

5- Plaintiff seeking request to enforce defendant to take positive steps to prevent further and future discrimination actions in each school and at any other sits. While such enforcement under the school board and superintendent district jurisdiction for code of conduct to be enforced against all not only against innocent children who may be need more guidance and direction than these adults who considered rule model.

Sworn to or affirmed and signed before me on 28th day of Nov. ,2011

Broward County/ Florida

.Notary Public or deputy clerk

Print, type or stamp commission name of notary or clerk

Produce identification Y08

Type of identification FLDL

Karen Stenderbergh
FLDL
[Signature]



Nasra M. Arafat

Pro-Se /plaintiff
Name Nasra M. Arafat
P.O.BOX 772177
Coral Springs FL, 33077

11/28/11

I, full legal name Nasra M. Arafat none lawyer at P.O. Box 772177 Coral Springs FL,33077 , helped her self who is the Plaintiff to prepare & file all her legal.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served by [U.S. Marshal] on [Nov. 29, 2011] on all counsel or parties of record on the Service List below.



Signature of Filer

SERVICE LIST

Defendant address for service:

School Board Broward County (Broward.
County Public Schools)
600 S.E. 3rd Ave.
legal department
Fort Lauderdale FL, 33301

EEOC as agency not reported as defendant
address for service of plaintiff compliant:

EEOC Miami Local office
One Biscayne Blv. Suit # 2700
Miami FL, 33131

Date Nov. 29, 2011


Plaintiff-pro se 11/28/11
Nasra m. Arafat
P. O. BOX 772177
Coral Springs FL, 33077

I, full legal name Nasra M. Arafat none lawyer at P.O. Box 772177 Coral Springs FL, 33077 , helped her self who is the Plaintiff to prepare & file all her legal.

United States District Court
For the
Southern District Of Florida

<u>Nasra M. Arafat</u>)	
(pervious married name Ibarhim))	
Plaintiff,)	
)	
Vs.)	Civil Action No. _____.
)	
<u>School Board Broward County (Broward.</u>)	
<u>County Public Schools)</u>)	
Defendant,)	

Appendix / Attachments To Plaintiff's Compliant

Attachment A

and

Attachment B

Certification Of Services

I hereby certify that a true copy and correct copy of the forgoing was served with the complaint as attachment by US marshal on Nov. 28,2011 on all counsel or parties of record.



Plaintiff-pro se
Nasra m. Arafat
P. O. BOX 772177
Coral Springs FL, 33077

11/28/11

I, full legal name Nasra M. Arafat none lawyer at P.O. Box 772177 Coral Springs FL,33077 , helped her self who is the Plaintiff to prepare & file all her legal.

Appendix / Attachments

Name -----page #.

Attachment A

- 1- plaintiff's notarized statement to amend and correct information to EEOC.....7
local office dated Feb. 03,2011

- 2- updated EEOC form 5 (11/09) dated 02/02/2011.....7

- 3- EEOC notice / order for " dismissal and Notice of rights" dated 08/26/2011.....7
Received by plaintiff on Sep. 07,2011

- 4- EEOC order/ decision on 10/19/2011 to deny plaintiff timely Re-review8
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- 5- plaintiff's last and recent request for EEOC to review and get a copy.....9
from her file (especially employer's response to the charge)

- 6- respondent/ employer's wrongful termination action on 04/28/2010.....10

- 7- plaintiff's official request for promotion on 01/02/2010 to superintendent.....10
Of the schools and to science department (core curriculum)

- 7- false evaluation by principal from school plaintiff never work10
with in 05/29/2002.

- 8- respondent's investigation in 06/11/2002to indicated the principal misconduct11
For false evaluation

- 9- plaintiff's official request on 05/21/2010 to respondent's staff11
Asking for a copy from the six evaluation mention in the wrongful termination
on 04/28/2010

- 10- false evaluation on 10/18/2006 by Nova High school which plaintiff13
never work there (by employee in her E-mail)

- 11- false evaluation on 10/31/2006 by Cypress Bay High sub-coordinator.....13

- 12- plaintiff's students loan as become double as \$103,236.58.....13

- 13- plaintiff's recommendation and certificate for appreciations by13

middle schools for 7 years where plaintiff did work most of the times as only sample

14- respondent’s false evaluations as described in the pages # 14&15 issued.....14 &15
on 12/05/2008 in same day as exhibits A 24& A 25 (West Broward High)

15- respondent false letter from school employee who committed misconduct.....15
Against plaintiff on 04/16/2010 when his action was at 7:40 am before plaintiff started
Her work inside the classroom (North east High)

16- police report by plaintiff on 04/16/2010 after respondent done nothing16
Against the same employee on this day (misconduct North E.H.)

17- respondent’s false evaluation by Henry D. Perry middle school on 04/13/2010.....16
As explained in the page

18- false evaluation 03/02/07 school Coral Glades High school plaintiff17
Asked if she can verified new request by her department in order for the school
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19- plaintiff’s mandatory evaluations from middle school to decide the new.....17
Employee’s position in class room or not by schools & HRD back on 2000/2001 school year
plus other new recommendation listed in page #13 (exhibits A20-23)

20- plaintiff’s new updated record for advance education and teacher certification.....17

21- plaintiff’s court record to conclude all court file and background19
check investigation

22- plaintiff’s request for updating her education and for better position.....20

23- plaintiff’s request for employment verification but respondent failed.....24
to provide correct and complete personal, employment and salary information about plaintiff.

24- plaintiff’s response dated Oct. 6&7,2010 on new director action24
during job fair open for public on Oct. 05,2010 as advertised by Channel 7 news

Attachment B

1- plaintiff’s response dated 10/29/2010 to respondent after plaintiff received some17
evaluations after respondent send it later after Oct. 05,2010

**Nasra M. Arafat (pervious married Ibrahim)
P.O.BOX 772177
Coral Sprigs FL, 33077**

February 02,2011

Equal Employment Opportunity Commission
EEOC Miami District Office
2 South Biscayne Blve Suit # 2700
Miami Fl, 33131

Agency/charge #510-2011-02262

Add and correct information in form EEOC 5(11/09)

Dear / district office representative:

Thank your very much for your time and effort to review and complete the paper work to enter and / or filed a charge regarding my employer Broward Public School discrimination issue.

Please be advised that I'm sending the updating 2nd form EEOC # 5 (11/09) dated Feb. 01,2011 after I did add and / or correct some information by putting my middle initial beside any correction or addition. While this 2nd one I did signed at your office after the 1st signed similar one was canceled in the same day because it was incomplete with essential information like I'm 54 years old Egyptian & American citizen since 1985 (Date of Birth March 09,1957) and the age discrimination box which will cause conflict with facts occurred and reported in all my attachments plus a copy from my official response to my employer as well as the singed & completed intake questionnaire which was given to you on Feb. 01,201 during filling this form.

This 2nd singed updated one which I reviewed it after I went home I realized that the other following information should be added and /or corrected with my middle initial. This information as follow:

1- the box for the number of my employer employees is more than 500 (it is 30,000.00 employees) not 201-500. Retaliation box not applicable in my case and it is blank in my intake questionnaire.

2-the phone number for my employer should be added which (754) 321-0000

3-I don't have any cell-phone and the number reported in the form is a fax line which it can be used to send fax to me.

4-This form stated that there is a statement of privacy (act 1974) and other information I should review please send or fax me a copy as soon as possible or where I can find these information because I did not see or read it while I was at your office.

I certify that this Notarized affidavit (notice) for updated EEOC 5 (11/09) form send by fax (305)808-1855 and certified mail to: EEOC 2 South Biscayne Blv Suite # 2700 Maimi Fl, 33131 for consideration as a complete, true and correct information.

Thank you for your time and support as well as your understanding and attention to this matter

Sincerely

Nasra M. Arafat 2/3/11

Nasra M. Arafat/(pervious married name Ibrahim)



[Handwritten signature]
EX DEC 8-14

A1

U7855 PART # 45230127

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

FEPA
 EEOC

510-2011-02262

Florida Commission on Human Relations

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

N.M. married name 2/2/11
Ms. Nasra M. Arafat (previously known as Ibrahim)

Home Phone (Incl. Area Code)

N.M. 2/2/11
 Fax *No cell phone*
 (954) 247-9061

Date of Birth

03/09/1957

Street Address

City, State and ZIP Code

N.M.
P.O. Box 772177, Coral Springs, FL 33077

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

BROWARD COUNTY SCHOOL BOARD

No. Employees, Members

More than 500
 201-500

Phone No. (Include Area Code)

N.M. 2/2/11
 (754) 321-0000

Street Address

City, State and ZIP Code

N.M. 2/2/11
600 Se 3rd Avenue, Ft Lauderdale, FL 33301

DISCRIMINATION BASED ON (Check appropriate box(es).)

N.M. 2/2/11
 RACE COLOR SEX RELIGION NATIONAL ORIGIN
N/A RETALIATION AGE DISABILITY GENETIC INFORMATION
N/A OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest Latest
04-28-2010 10-05-2010

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

- I. I am a 54 year old Middle Eastern Muslim Female. I was employed by the above named Respondent since March 2001, as a Substitute Teacher. During my employment, I have been subjected to harassment in regards to my National Origin and Religion. On various occasions, I have reported for work at different schools and have been told that I am no longer needed or placed on a do not call list. Also, I have applied for promotional positions after receiving my Master's Degree in Educational Leadership and Teacher's Certification in Science, but have never received a response in regards to the status of this promotion. Other Male individuals have sought this position and have been hired at a higher pay rate. I was sent to schools getting lower pay rate where other employees were sent to different schools earning more than myself. On April 28, 2010, I was advised by Respondent that my name had been removed from the approved list of substitute teachers. I have sent various complaint letters regarding this incident to no avail. On October 05, 2010, while attending a Public Job Fair held by Broward County Schools, I was informed that I had to leave and could not apply for any open positions by Director for Instructional Staffing Susan Rockman. I believe Ms. Rockman wanted younger individuals who were fresh graduates. I believe that the above incidents have occurred in an effort to keep me from obtaining gainful employment.
- II. The reason given for my name being removed from the approved list was that I had six negative evaluations yet, this is untrue. No response has been given to my inquiries for my lack of promotion.
- III. I believe that I have been discriminated against on the basis of my Sex/Female, Age/54, National Origin/Middle Eastern, and Religion/Muslim, in violation of Title VII Civil Rights Act of 1964, as amended, the Age Discrimination in Employment Act of 1967, as amended, and The Equal Employment Act of 1963, as amended.

(See Attached Document)

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.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

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

Feb 01, 2011

Date

Nasra M. Arafat 2/2/11
Nasra M. Arafat 2/1/11

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
 (month, day, year)

A2

EEOC Form 161 (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Nasra Arafat
P.O. Box 772177
Coral Springs, FL 33077

From: Miami District Office
2 South Biscayne Blvd
Suite 2700
Miami, FL 33131

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No. 510-2011-02262
EEOC Representative Deborah Bauer, Senior Federal Investigator
Telephone No. (305) 808-1756

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
[X] The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
Other (briefly state)

- NOTICE OF SUIT RIGHTS -
(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Commission
MALCOLM S. MEDLEY, District Director

Enclosures(s)

(Date Mailed)

cc: Dildra Martin-Ogburn
Executive Director, Benefits and EEO Compliance
SCHOOL BOARD OF BROWARD COUNTY
600 S.E. 3rd Avenue, 14th Floor
Fort Lauderdale, FL 33301

A3



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Miami District Office

One Biscayne Tower
2 South Biscayne Blvd., Suite 2700
Miami, FL 33131
(305) 808-1740
TTY (305) 808-1742
FAX (305) 808-1741

Ms. Nasra Arafat
PO Box 772177
Coral Springs, FL 33077

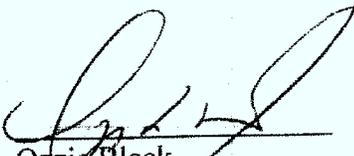
Re: Arafat v School Board of Broward County
EEOC Charge No: 510 2011 02262

Dear Ms. Arafat:

Your letter requesting reconsideration of the Dismissal and Notice of Rights in the above referenced matter is hereby denied.

In accordance with Commission Regulation CFR 29, Section 1601.21(d), we have issued a final determination on the above cited case. The contentions and information introduced and presented in your request, as well as the entire record, have been reviewed and analyzed. Based upon that review, I have concluded that the evidence submitted is not sufficient to warrant a different determination.

Sincerely,


Ozzie Black
Deputy Director

OCT 19 2011

**EEOC Miami District
Office**

Date

**Nasra M. Arafat (pervious married Ibrahim)
P.O.BOX 772177
Coral Sprigs FL, 33077**

November 09,2011

Mrs./ Fredricka B. Warren

Equal Employment Opportunity Commission
EEOC Miami District Office
2 South Biscayne Blv Suit # 2700
Miami Fl, 33131

Agency/charge #510-2011-02262

Request access and review to full record / file (FOIA)

Please be advised that I send several requests in writing requesting access to my entire file completely and any record related to this matter from any resources. The issue was the costs of the record as my letter dated 11/06/11 explained the reason why I can't pay the costs copy attached again. The conclusion and after my phone communication with you and your staff Mrs./ Crystal on Nov. 08 also before you stated that you will send me my employer response only free of charge but yet I didn't receive it. In addition I'm still requesting to come to your office and review my entire full file before the end of 90 days from your decision in the case. Also I need to know how much the cost for the rest of the documents excluding the ones you will send and any documents filed by me in this file because I have it in my record.

Also the languages you did use for our phone conversation is not acceptable and I can't understand such language as you informed me that {your employee has no time to do a babysitter for me and to stay with me for more than an hour} in order for me to review my file. Also you stated that {I have to be very ill to allow me to have access to my file}. I'm disappointed to such language which is not acceptable and not professional especially when this difficult circumstances occurred for people who work hard with expensive costs for their education which take their entire life then irresponsible people who want to cover their crimes and wrong doing committed such hate crime through misleading the system by committing their discriminatory action to leave them homeless and helpless to defend themselves in justice system.

Therefore please send me my employer response as you did agree with as will as the costs for the rest of the record if I have to pay for it how much will be ? and time and date in order for me to come to your office to review the entire complete file as soon as possible with careful attention to the time limitation according to FOIA and EEOC regulations at 29 C.F.R. Part 1610.

I certify that a true copy send by fax to all parties involve.

Sincerely



Nasra M. Arafat

Cc:
FOIA headquarter Washington DC
EEOC federal operation Washington DC

A5

THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

600 SOUTHEAST THIRD AVENUE, FORT LAUDERDALE, FL 33301 * Telephone: 754-321-2324 * Fax: 754-321-2716

BECKI BRITO, DIRECTOR
INSTRUCTIONAL STAFFING DEPARTMENT
www.browardschools.com/teacher

SCHOOL BOARD

Chair JENNIFER LEONARD GOTTLIEB
Vice Chair BENJAMIN J. WILLIAMS

ROBIN BARTLEMAN
MAUREEN S. DINNEN
PHYLLIS C. HOPF
STEPHANIE ARMA KRAFT, ESQ
ANN MURRAY
ROBERT D. PARKS, Ed.D
KEVIN P. TYNAN, ESQ

JAMES F. NOTTER
Superintendent of Schools

April 28, 2010

Nasra M. Arafat
P.O. Box 772177
Coral Springs, FL 33077

Dear Ms. Arafat:

The purpose of this letter is to inform you that as of April 28, 2010, your name has been removed from the approved list of substitute teachers with The School Board of Broward County, Florida. This action resulted from six negative evaluations received from various schools.

Please find attached a copy of the Substitute Teacher Clearance Form that you signed on August 10, 2006, during your substitute teacher clearance appointment, which states:

"My name may be removed from the approved substitute teacher list when three or more schools have negatively evaluated my performance or have requested that I not return to their location or for not showing up to an accepted assignment. Excessive unavailability may also be cause for removal from the approved substitute teacher list."

If you have any questions or need further information, please contact Ty Cunningham, Administrator, Sub Central Department, at 754-321-2340.

Best of luck in your future endeavors.

Sincerely,


Becki Brito, Director
Instructional Staffing Department

GMD/RAB/TC:kds
Attachment

c: Gracie M. Diaz, Acting Associate Superintendent, Human Resources
Ty Cunningham, Personnel Administrator, Sub Central

A6

A6

Nasra M. Arafat
P.O.BOX 772177
Coral Springs FL,33077

January 02,2010

Mr./ James Notter

School Board Broward County
Superintendent of Broward School
600 S.E. 3rd Ave.
Ft. Lauderdale FL, 33301

Position and Salary Matter

Dear Mr./ James:

Please provide me with a chance to conduct meeting with School Board in your presence which will be appreciated the issue is the following:

- 1-attached letter
- 2-my promotion
- 3-Science project

Thank you

Sincerely



Nasra Arafat

Cc:

Mr./ Marlynn Strong
Dr. / Keener -Science Dep.
Dr./ Earlean Smiley /core curriculum
Instructional staffing

Nasra M. Arafat
P.O.BOX 772177
Coral Springs FL,33077

January 02,2010
School Board Broward County
Ms./Marilynn "Lynn" Strong
Human Resources Department
600 S.E. 3rd Ave.
Ft. Lauderdale FL, 33301

Response to Your 2nd Letter

Dear Ms. / Strong:

Thank you for your 2nd letter dated December 16,2009.

Please accept the fact which on contrary to what you stated in your letter. The fact is there is no attachment to or with your letter as you reported which related to my nonpayment for my work at Western High School and the over payment related to West Broward High School.

The reason you listed why my hours for substitute teacher reduced this year and after my name changed which for first time since I started working with school board on 2000/2001 school year, this reason never mention before, while I was demanding a reason for long time since such sudden change. Furthermore I informed by other employees personal with many different reason. Therefore I'm requesting any location official report who provided you with such reason as you reported in your letter.

I believed may be these locations are correct while the system called me for sub for Spanish Language teacher and the position identified as vacancy in the sub-search system of course my performance is Zero because I don't know this languages. I did report this situation personally to DR./ J.P. Keneer when I saw him at the Science Teachers Conference (NSTA) which effect the student benefits in the first place. Also it happened only this year while my work hours get interrupted. Please be advised that my entire education and experiences is Science Education plus 9 years experiences in the classroom plus my recent Master Degree in Education. I believed that these location put me in wrong position at the wrong time and they have right to do so. Therefore these location must notifying by human recourses about the right person to be replacement with the right place.

Therefore I will move on to adders this matter to School Board Members and the Superintendent while I did wait for long time and my work hours still limited and I'm still not getting pay for the hours I did work which effected me financially and accordingly my entire life therefore I'm objecting to your entire letter.

Thank you

Sincerely



Nasra Arafat

Cc:

Dr./ Keneer Science Dep.

Instructional staffing

Superintendent/ Mr./ James Notter

Sub-central /search

15

**Nasra M. Arafat
P.O.BOX 772177
Coral Springs FL,33077**

January 02,2010

Dr. / J. P. Keener

School Board Broward County
Science Curriculum
600 S.E. 3rd Ave.
Ft. Lauderdale FL, 33301

Curriculum Development

Dear Dr./ Keener:

If you please and you have time I would like your office to provide me with an appointment to review a sample of lesson plan for Middle School Grade which I prepared based on my actual studies for science, experiences and based research from assorted scientific resources and approved by my professor during my studies.

I would like you to be presented during my meeting with school board members and the superintendent while I will discuss brief idea about the science project. Before that I would like to meet with you first to take your approval for what may be approve to be applied and what can't be while you know better the financial circumstances and other factors to administrate this lessons plan as essential part for health and life science.

I will be looking forward to hear from your office regarding my request.

Thank you for your help and cooperation

Sincerely


Nasra M. Araft 1/2/10

Cc:
Superintendent School Board Broward County
Dr./ Earlean Smiley

A9



THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA

600 SOUTHEAST THIRD AVENUE • FORT LAUDERDALE, FLORIDA 33301-3125 • TEL 754-321-1874 • FAX 754-321-1888

Dr. J.P. Keener
6-12 Science Curriculum Specialist
Core Curriculum
Internet: jpkeneer@browardschools.com

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JAMES F. NOTTER
Superintendent of Schools

August 20, 2010

Nasra M. Arafat
P.O. Box 772177
Coral Springs, FL 33077

Dear Ms. Arafat:

Thank you for your continued support of science instruction in our classrooms. It is clear that you have a passion for instruction, and we are grateful for the time you have spent in our schools and working with the students of Broward County.

Please know that we have reviewed your proposal and your curricular ideas and do recognize that there is merit behind your suggestions. However, at this time, we do not have the funding, support, or resources to make this type of venue a reality in our schools. We recognize the effort you have put into this program, and we want you to know that your ideas may help shape new policies and procedures in the future. Unfortunately, we are not able to act on this program at this time.

Thank you again for expressing an interest in working with our teachers and students. Should these types of opportunities become available in the future, we will happily contact you for continued discussions.

Sincerely,

JP Keener
6-12 Science Curriculum Specialist

JPK:jg

A10

Nasra M. Arafat
P.O. BOX 772177
Coral Springs FL, 33077

September 06, 2010

Dr. / J. P. Keener
Director of Science Curriculum
School Board Broward County
600 S.E. 3rd Ave.
Ft. Lauderdale FL, 33301

Dear Dr. / Keener:

Thank you for your letter dated August 20, 2010 I really appreciate your response. It is understood that funding is always and have been a problem to reach our distantly even in our daily life but this it does not mean that we have to stop from doing something about it.

Therefore our duties is to take all the steps to reach other departments who are responsible about funding. There are many categories for most of funds especially to improve education waiting for all districts to apply on time from state and federal resources as well from other different agencies and companies. These facts according to my study based research for Budget and Finance in Education System which I applied one of them personally when I worked as a teacher at Deerfield Beach M.S.; it was the school who asked me to work for science teacher position because I wasn't ready but I accepted as trial and tools for my research.

If you did agree for my science projects proposal and curricular ideas as all other did which considered the first step then all other steps will follow accordingly by providing the idea and proposal projects officially for next responsible authorities.

I believe my new innovations considered a priority which must take place first especially when there is a problems will affected the future of all man kind and can't be solve without applicability for science education standard. Therefore science curriculum department duties is to prepare the new innovations then provided officially to the department who are responsible about both the research and implementing new innovation as well as to the budget department at any level in education system.

Also there is another type of problems can be solve and save money not spending money as I explained from my own experience when I worked as a science teacher at Deerfield Beach on 2005/2006 school year which affected students who had particular academic level. While in some schools statistically represent 75 % of the total students numbers. The school layoff me after the 1st semester because I told the truth about the problem and how to be solve from all official papers for students different work assignments as well as the new books and new dictionary I brought on my own but I need permission to make the changes which is required to cope with those students academic level because the regular 7th Grade science curriculum not for them when they are in need for specific form and level similar to 1st & 2nd grade science other wise it is wasting for resources and those kids will never have education or future because the same cycle will continuo the following years.

AN