

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

_____ and EEOC

State or local Agency, if any

Name (indicate Mr. Ms. Mrs.)

Home Phone (Incl. Area Code)

Date of Birth

Street Address

City, State and ZIP Code

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

Williamsburg Montessori School

No. Employees, Members

more than 20

Phone No. (Include Area Code)

(718) 384-3400

Street Address

450 Kent Ave,

City, State and ZIP Code

Brooklyn, NY 11249

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

RACE COLOR SEX RELIGION NATIONAL ORIGIN

RETALIATION AGE DISABILITY OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest (ADEA/EPA)

Latest (All)

August 28, 2024

CONTINUING ACTION

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

See attached complaint.

[] 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

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

Date

Charging Party Signature

**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NEW YORK DISTRICT OFFICE**

X

[REDACTED]

Claimant,

- against -

**EEOC CHARGE
OF DISCRIMINATION:
NARRATIVE STATEMENT**

WILLIAMSBURG MONTESSORY SCHOOL;

Respondent.

X

Claimant [REDACTED] hereby alleges the following against Respondent Williamsburg Montessori School in support of her claims of discrimination, harassment, and unlawful retaliation on the basis of her race.

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

1. At all relevant times hereto, Charging Party [REDACTED]

[REDACTED] has been a resident of the State of New York.

2. At all relevant times hereto, Williamsburg Montessori School (“Respondent” or “School” or “WMS”) was and is a non-profit business maintaining its principal place of business at, 450 Kent Ave, Brooklyn, NY 11249.

3. Upon information and belief, Respondent employs more than 20 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Charging Party is proceeding herein.

4. At all relevant times hereto, Charging Party was an employee of Respondent.

Material Facts

5. With nearly 30 years of experience in early childhood education, [REDACTED] has established herself as a leader in Montessori philosophy and curriculum development.

6. After earning a Bachelor of Science in Education from Long Island University in 2000, she applied her expertise as a preschool teacher, refining her understanding of how children learn and thrive.

7. In 2016, she advanced her career as a Montessori Co-Guide at Hopscotch Montessori School, where she deepened her mastery of the Montessori approach.

8. Her commitment to excellence led her to complete Early Childhood Montessori Teacher Training, sharpening her skills and solidifying her ability to implement transformative educational practices.

9. [REDACTED] work consistently emphasized integrating DEIB principles, fostering inclusive environments, and mentoring educators in authentic Montessori practices.

10. On June 24, 2022, [REDACTED] received an offer letter from [REDACTED] former Head of School at WMS, inviting her to join the WMS team.

11. What was initially presented as a promising and mutually beneficial opportunity quickly revealed itself to be a far more challenging endeavor than anticipated.

12. On September 6, 2022, [REDACTED] commenced her employment at WMS, and from the outset, [REDACTED] recognized issues of racism and “othering” that permeated the institution.

13. Prior to [REDACTED] joining WMS, reports from teachers of preferential treatment for white staff and students were rampant.

14. On or around September 20, 2022, shortly after [REDACTED] commenced her employment, parents of students at the School raised concerns about cultural insensitivity.

15. Specifically, parents of Black students were especially concerned that there were only one or two students of color in each classroom, making their children feel “othered.”

16. Parents expressed their concerns to [REDACTED] that some WMS teachers had told them during conferences, “[we] don’t see color.”

17. This statement left parents feeling that their children were not truly being seen or understood.

18. As one parent explained, “If the teacher doesn’t see color, how can they fully see and value [their] children [of color]?”

19. Recognizing [REDACTED] expertise, [REDACTED] leaned on [REDACTED] to address these concerns and increase DEIB within the school.

20. Parents were frustrated and felt as if WMS’s promises of diversity and inclusion were not being fulfilled and were specifically being ignored.

21. On September 28, 2022, during a meeting with parents, [REDACTED] introduced [REDACTED] as the DEIB Coordinator.

22. During the meeting, parents brought up their concerns that white teachers were “othering” their children of color and treating them differently from their white peers.

23. Parents also raised concerns about the lack of diversity in the curriculum, which they felt was entirely inconsistent with WMS’s stated commitment to diversity and the core principles of the Montessori approach.

24. On September 25, 2022, [REDACTED], a WMS parent and a Black educator herself, sent an email to [REDACTED] expressing concerns about the way her child was being treated in the classroom.

25. [REDACTED] forwarded the email to [REDACTED], requesting [REDACTED] thoughts on the situation.

26. [REDACTED] email expressed concerns regarding the way her child's teachers, Ms. Monica [REDACTED] Lilybeth [REDACTED] and Alice [REDACTED] would discuss white and Black students.

27. WMS had a transparent classroom software, where teachers would take pictures of the students and make them available to the parents.

28. Teachers would post these photos with short captions, normally saying things like, "the group of students are reading" or "the group of students are working together on a project."

29. However, when there was a Black child in the image, the caption would instead read "the [white student's name] is helping the [Black student's name] read" or "the [white student's name] is teaching the [Black student's name]."

30. [REDACTED] expressed concerns that by labeling the photos this way, WMS was communicating to her child that she needs additional help from her white peers.

31. Understandably, [REDACTED] was very concerned about how this messaging would affect her young child.

32. Following receipt of the email, [REDACTED] requested a meeting with WMS's administration.

33. In or around September 2022, [REDACTED] met with [REDACTED] and [REDACTED].

34. During the meeting, ██████████ assured the parents that WMS was a diverse and inclusive school, and it was never anyone's intention to make ██████████ child feel different from her peers.

35. ██████████ was assured that measures would be taken to prevent anything like this from happening in the future. ██████████ requested to have a separate meeting with her child's teachers, without the administration present, as she wanted to share her concerns with the teachers themselves but did not want the teachers to feel pressured by having members of the administration sit in on the meeting.

36. After ██████████ met with her daughter's teachers, ██████████ and ██████████ had a separate meeting with the teachers regarding the situation to implement a process to increase diversity and inclusion in the School.

37. Despite knowing the concerns were coming from a student's parents, the teachers immediately became defensive, accusing ██████████ and ██████████ of calling them racist.

38. ██████████ clarified that she was simply relaying the parents' concerns and recommended that the teachers adopt low-inference notes—writing only what is observable in photographs without adding subjective commentary.

39. Instead of following this constructive suggestion, the teachers chose to stop writing captions altogether, further dismissing the issue.

40. This blatant resistance underscored the urgent and critical need for DEIB training at WMS.

41. Without such training, the teachers' refusal to engage meaningfully with feedback risked perpetuating a hostile and dismissive environment for students and families, directly contradicting the school's stated values.

42. Given the teachers' responses, ██████ saw that the teachers had not yet learned the vocabulary necessary to have these difficult conversations.

43. ██████ hoped that DEIB training would make these conversations less adversarial in the future and allow for the teachers to embrace diversity and inclusion at the School.

44. While ██████ early efforts brought some progress, she soon encountered significant resistance, particularly from Bella Shaulova, who had transitioned from Assistant Head-of-School to an Elementary School Guide in 2021.

45. From the start, Ms. Shaulova positioned herself as a vocal opponent of DEIB initiatives, claiming they caused "divisiveness" and refusing to participate in training sessions.

46. In fall of 2023, Ms. Shaulova refused to attend any DEIB training that ██████ had organized, despite being required to attend pursuant to the rules in the Employee Handbook.

47. This behavior wasn't just dismissive—it was emblematic of a deeper, institutional resistance to equity and inclusion.

48. Ms. Shaulova had the opportunity and the responsibility to lead by example.

49. As a leader at the school, her refusal to take part in ██████ efforts made other teachers feel as if they did not have to implement the DEIB programs ██████ had spent significant time and effort creating.

50. ██████ work also included addressing incidents of racial profiling.

51. In early spring of 2023, ██████, a teacher and a parent of a student at WMS, spoke to ██████ about her concerns over how her Black son was being treated by his teachers in the Aspen classroom.

52. ██████ went to observe the classroom and witnessed the teachers, Lorena (last name unknown) and Evelina (last name unknown), overcorrecting the Black children in the classroom.

53. By way of example, ██████ noticed the two teachers calling out a Black student while allowing a white student to self-correct.

54. ██████ brought her concerns regarding the teacher's behavior to ██████.

55. ██████ told ██████ that any feedback to the teachers should come directly from ██████, explaining that, as a white woman, she "[didn't] have the right words" and that it "would be better coming from [██████] as a Black woman]."

56. This not only unfairly placed the burden of addressing the teachers' behavior solely on ██████ but also isolated her, reinforcing the perception that she lacked support or backing for her initiatives.

57. This dynamic painted her as a troublemaker rather than a leader driving necessary change, further undermining her position at the school.

58. Nevertheless, ██████ organized a meeting between herself and the teachers in the Aspen classroom in order to correct the concerning behavior of the teachers.

59. Again, however, ██████ comments and advice were met with defensiveness and hostility, before ultimately being ignored altogether.

60. The situation remained unresolved, and ██████ recommended that ██████ send an email to ██████ to escalate the situation and get to some sort of resolution.

61. On May 23, 2023, ██████ reached out to ██████ and ██████ stating that her *two-year-old child* had been racially profiled by his teachers, especially Lorena.

62. ██████ again attempted to handle the matter with sensitivity and professionalism, reinforcing her role as a trusted leader in navigating these difficult issues.

63. She again attempted to open a dialogue with the teachers of the Aspen classroom and again, her attempts to facilitate a safe and inclusive environment went ignored.

64. Lorena and Evelina treated ██████ with open hostility, telling other staff members that ██████ had called them racist.

65. Again, ██████ emphasized that no one was calling any teachers racist, she was just ensuring that the students were safe and attempting to foster an inclusive classroom.

66. Ultimately, ██████ decided to remove ██████ son from the Aspen classroom and place him in the Maple classroom.

67. Despite continuing to share a classroom, the Aspen classroom teachers never issued an apology to ██████ for the treatment of her son.

68. It is deeply troubling that a two-year-old child had to be relocated to avoid being racially profiled.

69. The responsibility should never fall on parents to ensure their children are taught in a safe and inclusive environment—yet, at WMS, this remains the harsh reality for children of color.

70. In or around June 2023, there was another racial incident in the Aspen classroom.

71. As part of the School's diversity initiative, ██████ ordered books for Juneteenth and planned activities to teach the students about the holiday and further the DEIB initiative.

72. In the Aspen classroom, the teachers had the students make a paper doll that looked like an **enslaved person**.

73. [REDACTED] was aghast at the tone-deaf activity and concerned that her continued conversations with the teachers in the Aspen classroom were not having any type of an impact on Lorena's racist behavior.

74. In September 2023, Lorena was told by WMS administration that she was not being asked back to WMS for the upcoming school year.

75. Lorena then posted a public Yelp review of WMS calling [REDACTED] "an evil and wicked lady."

76. Lorena went on to say that [REDACTED] should "seek mental help," and she was "racist" and "scared" [REDACTED]

77. This Yelp post spread like wildfire through WMS, with multiple teachers informing [REDACTED] that Lorena had written the post.

78. Ultimately the post was removed from Yelp but the post highlighted how teachers at the School felt about [REDACTED] attempt to change the status quo and create an environment where students felt safe and could prosper.

79. In October 2023, tensions escalated during a professional development session where teachers of color raised concerns about pay disparities and inaccessible health insurance.

80. Staff expressed frustration and signed a petition over an inequitable pay scale that consistently undervalued teachers of color.

81. [REDACTED] [REDACTED] a white teacher at WMS specifically said that white teachers were paid more than teachers of color.

82. Instead of addressing these issues head-on, the administration formed a superficial "transparency committee."

83. [REDACTED], meanwhile, continued advocating for systemic change, often with little support from leadership.

84. As a member of the committee, [REDACTED] was able to secure a raise for all teachers at the school, however, Mr. Kraus disregarded the increase recommended by the committee.

85. Once the raises were awarded, the transparency committee was disbanded and there was never any resolution on finding an accessible health insurance plan that all teachers could afford

86. On July 29, 2024, [REDACTED] informed [REDACTED] that she would be leaving WMS in early November 2024, because she was offered the opportunity to open a new Montessori school in the Bahamas.

87. At this meeting, [REDACTED] told [REDACTED] that WMS owner, Leon Kraus, had selected Ms. Shaulova to be the new head of school and that [REDACTED] would help Ms. Shaulova transition into her new role.

88. [REDACTED] assured [REDACTED] that DEIB would remain a priority.

89. Given Ms. Shaulova's history of resisting [REDACTED] DEIB efforts, [REDACTED] was skeptical but hopeful that she would be proven wrong.

90. However, in early August 2024, it was ultimately decided that [REDACTED] would no longer be helping Ms. Shaulova transition into her new role as Head of School.

91. Immediately, Ms. Shaulova, who had already been in opposition to [REDACTED] goals of DEIB, escalated her campaign to push [REDACTED] out of her role.

92. Ms. Shaulova made it clear that diversity and inclusion were not a priority during her reign at WMS by continually pushing off and avoiding any questions [REDACTED] posed on DEIB initiatives and training for the upcoming school year.

93. On or around August 6, 2024, in a meeting between Ms. Shaulova and [REDACTED], Ms. Shaulova told [REDACTED] that “maybe [she] should go back to being a classroom teacher.”

94. When [REDACTED] questioned Ms. Shaulova, Ms. Shaulova refused to give [REDACTED] a clear answer and just said “[they] don’t have to discuss this now.”

95. It was clear that Ms. Shaulova was retaliating against [REDACTED] and pushing her out of her position.

96. In this meeting, Ms. Shaulova also told [REDACTED] that she “wasn’t afraid of lawsuits.”

97. Ms. Shaulova informed [REDACTED] that [REDACTED], an AMS Montessori Consultant, was no longer working at WMS because Ms. Shaulova had told Mr. Kraus that she did not like the way [REDACTED] spoke to her, and she did not want [REDACTED] help any longer.

98. When [REDACTED] informed Ms. Shaulova that [REDACTED] had worked closely with her on the employee relations and other important WMS committees and DEIB initiatives, Ms. Shaulova simply informed [REDACTED] that [REDACTED] would no longer be coming to the school.

99. This was a blatant attempt by Ms. Shaulova to intimidate [REDACTED] into acceding to her demands.

100. Nevertheless, [REDACTED] remained undeterred.

101. On August 6, 2024, during an administrative meeting between school administration and leadership, [REDACTED] proposed continuing the DEIB training program, only to be met with open hostility by Ms. Shaulova.

102. Ms. Shaulova dismissed the idea outright, stating, "I think not."

103. Her hostility was not confined to [REDACTED] DEIB initiatives.

104. Shortly thereafter, she began stripping [REDACTED] of her responsibilities, reassigning her to classroom duties and countermanding her communications to staff.

105. These actions were deliberate and calculated in an attempt to marginalize [REDACTED] and force her out of the school.

106. Other conversations with Ms. Shaulova further demeaned the DEIB work that [REDACTED] was hired to do.

107. On August 8, 2024, Ms. Shaulova canceled a planned DEIB training session without consulting [REDACTED], who had meticulously planned these sessions as part of her larger strategy for fostering inclusion at the School.

108. [REDACTED] was blindsided. Ms. Shaulova's actions were a blatant attempt to undermine [REDACTED] authority and discredit her contributions.

109. On August 8, 2024, [REDACTED] emailed Ms. Shaulova for clarification on when the next Diversity Training and Professional Development Day would be scheduled.

110. In response, Ms. Shaulova wrote that there would not be any more Diversity Training and that the DEIB work would need to be tabled because Ms. Shaulova had "other priorities."

111. Ms. Shaulova also tried to create conflict between [REDACTED] and the teachers at WMS by telling staff members that the DEIB training made the other (white) teachers uncomfortable and that it was more harmful than helpful.

112. [REDACTED] was never aware of any teachers who did not wish to participate in the training.

113. Ms. Shaulova was the only person who was outwardly disdainful. In fact, some teachers had approached [REDACTED] and requested that the DEIB training go deeper, as they felt it was only scratching the surface of the issues.

114. Instead of listening to the teachers' requests, Ms. Shaulova got rid of the training altogether.

115. As Ms. Shaulova was stripping [REDACTED] of her DEIB responsibilities, she was simultaneously requiring that [REDACTED] cover for teachers during their prep time or if they were out sick, basically turning [REDACTED], who was supposed to be an Educational Director, into a glorified substitute teacher.

116. In or around August 14, 2024, [REDACTED] began to be followed around the school by the Community Liaison, [REDACTED] and Ms. Shaulova's Executive Assistant, [REDACTED]
[REDACTED]

117. Both of these women were close friends with Ms. Shaulova and [REDACTED] felt as if they were monitoring her and reporting back to Ms. Shaulova.

118. They would often eavesdrop on [REDACTED] conversations with other teachers and parents.

119. There were times when they would try to prevent [REDACTED] from speaking to any parents at all.

120. In an email sent on August 8, 2024, Ms. Shaulova forbade [REDACTED] from communicating with teachers, telling [REDACTED] that all communications should be run through her first.

121. Prior to this email, [REDACTED] had sent an email to all the Lead Guides at WMS outlining the goals and preparations for the upcoming school year.

122. Ms. Shaulova ordered [REDACTED] to send a retraction email, and to tell the teachers that WMS would be pausing incorporation of diverse units of study into the curriculum.

123. Ms. Shaulova also decided to take over [REDACTED] parent book club and a school wide book fair, two projects she had been leading as Education Director.

124. After Ms. Shaulova made it clear that DEIB would no longer be a priority at WMS, [REDACTED] lost the respect and support of many of her coworkers.

125. [REDACTED] had several meetings scheduled with teachers and the teachers did not show up to these meetings, despite responding yes to the meeting invitation.

126. On August 11, 2024, recognizing the pattern of harassment, discrimination, and retaliation, [REDACTED] filed a formal complaint with Mr. Kraus.

127. She detailed the specific incidents of misconduct by Ms. Shaulova and the broader culture of hostility she had been enduring at the School.

128. However, rather than addressing these issues, the WMS administration chose to retaliate.

129. On August 14, 2024, [REDACTED] was informed by DEIB trainer [REDACTED], who was hired by WMS in Spring of 2023, that she had been advised that her services were no longer required at WMS.

130. [REDACTED] had received an email from Ms. Shaulova stating that WMS “was going in a different direction.”

131. [REDACTED] was never informed what direction WMS was going in or that [REDACTED] would be terminated.

132. In fact, the WMS Employee Handbook and [REDACTED] had assured [REDACTED] that DEIB would remain a priority at WMS.

133. Also on August 14, 2024, Ms. Shaulova had requested [REDACTED] cover for a teacher in one of the primary classrooms so that the new teaching teams could start planning for the upcoming school year.

134. [REDACTED] stated to her that she could not go into the classroom to help because she had spent the morning covering in one of the toddler Casa Maple classrooms and she had other contractual responsibilities, such as making the observation schedule for classroom teams.

135. [REDACTED] was helping the infant and toddler teachers with making their new classroom schedules and planning how WMS was going about incorporating Culturally Responsive Pedagogy (“CRP”) with the Montessori curriculum.

136. These tasks were made especially difficult given [REDACTED] termination, putting all of the responsibilities on [REDACTED].

137. When [REDACTED] tried to explain why she was unable to cover for the teacher, Ms. Shaulova became very angry and kept repeating “I don't understand!”

138. [REDACTED] emphasized that she had a responsibility to WMS to attempt to achieve her contractual obligations.

139. [REDACTED] asked if one of the other administrative members could go to cover the classroom and Ms. Shaulova refused to ask anyone else.

140. Seeing that [REDACTED] was not going to concede to Ms. Shaulova's unfair demands, she angrily stormed out of the office.

141. At this point, [REDACTED] sent a follow up email to Mr. Kraus regarding the harassment and retaliation from Ms. Shaulova. Mr. Kraus never responded.

142. On August 28, 2024, 17 days after [REDACTED] made her protected complaint, Mr. Kraus terminated [REDACTED] position, citing financial difficulties.

143. This justification was transparently false. [REDACTED] contributions to the School were well-documented, and her role was integral to its mission.

144. Mr. Kraus's decision was a clear act of retaliation, designed to silence [REDACTED] and erase her work.

145. It is clear that Mr. Kraus did not make [REDACTED] complaint a priority.

146. Mr. Kraus was aware of [REDACTED] complaints and the harassment and discrimination she was facing at the hands of Ms. Shaulova.

147. However, Mr. Kraus could not even take the time to read [REDACTED] full complaint in the 17 days between receiving it and notifying [REDACTED] of her termination.

148. Mr. Kraus claimed that "as a business... [resolving harassment] claims is crucial" but Mr. Kraus's words were clearly just lip-service.

149. It is clear from the foregoing that Respondent has engaged in unlawful discrimination, harassment, and retaliation on the basis of Charging Party's race in violation of Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 ("Title VII"), Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981 ("§ 1981"); the New York State Human Rights Law, New York State Executive Law, §§ 296 *et seq.* ("NYSHRL"); and the New York City Human Rights Law, Administrative Code §§ 8-107, *et seq.* ("NYCHRL"), the

compendium of which gives rise to compensatory damages based on lost wages and emotional distress, as well as punitive damages, interest, attorney's fees, and legal costs.

150. As a result of the foregoing, Charging Party has been and continues to be unlawfully discriminated against, humiliated, and degraded, and thus has suffered loss of rights, severe emotional distress, loss of income and earnings and possible damage to her professional reputation.

151. Because of Respondent's actions that have been malicious, willful, outrageous, and done with knowledge of the legion of the contrary, Charging Party demands punitive damages against Respondent.

152. Respondent's flagrant disregard of the above-referenced laws—including those not enforced by the EEOC—evidences a pattern and practice of discrimination and retaliation that falls squarely within the EEOC's investigatory and enforcement statutory mandates to investigate, and enforce prohibitions against, discriminatory conduct in the workplace.