FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS
SEP 15 2026
TAMMY H. DOWNS, CLERK
By: _____ DEP CLERK

**IN THE UNITED STATES DISTRICT COURT**
**FOR THE EASTERN DISTRICT OF ARKANSAS**
**CENTRAL DIVISION**

VASILII KHAMMAD — PLAINTIFF

v.

Case No 4:26CV943-BSM

THE BOARD OF TRUSTEES OF THE UNIVERSITY OF ARKANSAS, acting for and on behalf of the University of Arkansas for Medical Sciences — DEFENDANT

**COMPLAINT FOR NATIONAL-ORIGIN DISCRIMINATION UNDER TITLE VII AND DEMAND FOR JURY TRIAL**

Plaintiff Vasilii Khammad, proceeding pro se, alleges as follows:

**JURISDICTION AND VENUE**

1. This action arises under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e et seq. The Court has subject-matter jurisdiction under 28 U.S.C. § 1331 and 42 U.S.C. § 2000e-5(f)(3).

2. Venue is proper in this District under 42 U.S.C. § 2000e-5(f)(3). The challenged employment practices occurred in Little Rock, Pulaski County, Arkansas, where Plaintiff worked in the University of Arkansas for Medical Sciences (UAMS) Pediatrics Residency Program and would have continued working but for the challenged decisions.

**PARTIES**

3. Plaintiff Vasilii Khammad is a physician of Russian national origin and a former UAMS resident physician. His mailing address is 1159 Euclid Dr., Charleston, SC 29492.

4. Defendant is The Board of Trustees of the University of Arkansas, acting for and on behalf of UAMS, Plaintiff's employer. Its system office is at 2404 North University Avenue, Little Rock, AR 72207; UAMS is at 4301 West Markham Street, Little Rock, AR 72205.

This case assigned to District Judge Miller
and to Magistrate Judge Ervin

Defendant employs at least fifteen employees for the statutory period and is an employer under 42 U.S.C. § 2000e(b).

**ADMINISTRATIVE EXHAUSTION**

5. Plaintiff submitted EEOC Charge No. 493-2025-02379, signed July 16, 2025, identifying UAMS as the respondent and alleging, among other matters, national-origin discrimination in his discipline and termination. The charge was submitted within 180 days of the challenged April-June 2025 employment actions. A copy is attached as Exhibit B to document the administrative charge; the factual allegations and claim asserted in this action are set out below.

6. The EEOC issued its Determination and Notice of Rights on July 15, 2026. Plaintiff received it on July 15, 2026. A copy of the notice and its accompanying information is attached as Exhibit A.

7. Plaintiff has exhausted the administrative process for the Title VII claim pleaded here and brings this action within ninety days after receiving the notice.

**FACTUAL ALLEGATIONS**

8. Plaintiff began his UAMS pediatrics residency employment in June 2024 under an appointment scheduled to continue through June 30, 2025. He was the only resident physician of Russian national origin in the Pediatrics Residency Program during the relevant period.

9. Plaintiff was an international medical graduate employed by UAMS and training under J-1 physician sponsorship through the Educational Commission for Foreign Medical Graduates (ECFMG). UAMS and the officials involved in his employment knew his Russian national origin, his status as an international physician, and his dependence on

continued participation in the UAMS training program and UAMS's sponsorship-related support to maintain his J-1 status and continue graduate medical training.

10. Plaintiff does not allege that J-1 immigration status is itself a protected national origin under Title VII. Rather, he alleges that his J-1 status is relevant to the circumstances surrounding his treatment because it made his status as a foreign and international resident known to UAMS and because UAMS itself subsequently invoked his J-1 circumstances in explaining aspects of the employment arrangement imposed upon him during the challenged period.

11. Plaintiff had been accepted into the residency and performed assigned clinical duties. His evaluations included both criticism and favorable assessments. Hematology-oncology faculty described him as an exceptional resident who actively participated in learning activities, and other evaluations credited his work ethic, preparation, improvement, and patient care.

12. An Emergency Medicine faculty evaluation dated October 9, 2024 stated, "Language is definitely a barrier." The same evaluation also described Plaintiff as kind and pleasant to work with and noted improvement following feedback.

13. On December 17, 2024, Plaintiff met with Program Director Dr. Oriaku Kas-Osoka and Dr. Rachel Millner. Dr. Kas-Osoka criticized Plaintiff's English-language communication with staff as rude and inappropriate and directed him to change his manner of speaking. Plaintiff disputes that characterization. He alleges that this criticism reflected bias against his manner of communicating as a Russian, non-native English speaker.

14. UAMS implemented a Focused Review of Plaintiff in February 2025, scheduled to conclude in April. Plaintiff alleges that the communication criticism was carried into the

adverse assessment of his performance, despite favorable evaluations in his record. UAMS's EEOC response relied on its assessment of his Emergency Medicine performance, other evaluations, and the Clinical Competency Committee's review to explain the academic-improvement process. The 2024 events are alleged as background to the timely challenged employment actions.

15. On April 14, 2025, Plaintiff continued performing his assigned clinical duties. At approximately 10:34 a.m., a UAMS administrator reported by email that she had initiated administrative leave in Workday. The email stated that the leave would not take effect until later that day, after the findings were presented to Plaintiff.

16. At approximately 3:05 p.m. on April 14, personnel were coordinating restrictions on Plaintiff's institutional access. At approximately 4:00 p.m., program leadership met with him and presented allegations concerning his conduct and use of documents in exploring transfer opportunities.

17. During or immediately following that meeting, Plaintiff's badge was taken, he was escorted out, and his institutional access was revoked or materially restricted. An access-related email chain records authorization and implementation at approximately 4:04-4:05 p.m. Plaintiff was thereafter unable to continue his assigned clinical training.

18. The timing of these actions supports Plaintiff's allegation that material aspects of the adverse employment process were already underway before he was afforded an opportunity to respond to the allegations against him. The presently available records do not establish precisely when the termination decision itself was made, who made it, or whether his response at the April 14 meeting was capable of affecting that decision.

19. On April 15, 2025, Dr. Kas-Osoka issued a dismissal letter stating that Plaintiff's dismissal was effective April 16, 2025. UAMS alleged misconduct involving transfer-related communications and letters. Plaintiff disputes that he deceived faculty or prospective programs or engaged in the gross misconduct asserted as grounds for dismissal. He contested those allegations in his grievance and EEOC submissions.

20. Plaintiff formally invoked the resident grievance procedure on April 16, 2025. UAMS accepted and processed the grievance under GMEC Policy 1.410, notwithstanding the stated April 16 effective date of his dismissal.

21. UAMS characterized Plaintiff as being on unpaid administrative leave while the grievance was pending. Plaintiff received a paycheck dated April 30, 2025 covering the April 1-30 pay period, but regular compensation did not continue for the later grievance period. His institutional access and clinical duties were not restored. Plaintiff challenged the denial of continuing compensation and the handling of his employment status.

22. Records produced by UAMS reflect Workday processing continuing into May 2025, including entries recorded as completed on May 2. Plaintiff alleges that this later processing, together with UAMS's continued review of his grievance and employment status into June, does not neatly correspond to a single, ordinary employment-separation event effective April 16.

23. A Step I grievance meeting occurred on May 5, 2025, after which the dismissal was upheld. Plaintiff then sought review by Dean Dr. Steven Webber.

24. On May 6, 2025, ECFMG, Plaintiff's J-1 physician sponsor, informed him by email that it was not aware of his dismissal and would contact the training program liaison, although UAMS had informed Plaintiff that his dismissal was effective April 16.

25. The grievance remained under institutional review until Dean Webber denied it on June 6, 2025. Human Resources action concerning Plaintiff's separation followed.

26. On June 12, 2025, Human Resources notified Plaintiff that his final day of employment was June 11, 2025, the date also identified in UAMS's EEOC position statement. That employment end date differs from the April 16 effective date stated for his program dismissal. Plaintiff does not allege that he performed clinical training through June 11.

27. In its EEOC position statement, UAMS explained that, given Plaintiff's visa and immigration circumstances, it continued him on administrative leave without pay and delayed terminating his employment until the grievance ended to prevent adverse consequences to his visa status. Plaintiff alleges that this explanation expressly connects his J-1 circumstances to the intervening employment arrangement; he disputes that the explanation fully accounts for the treatment imposed on him.

28. Plaintiff alleges that the process applied to him materially departed from the established disciplinary and grievance framework applicable to resident physicians. GMEC Policy 1.410 calls for prompt and impartial grievance handling and protects participants against loss of compensation for time spent in a step of that procedure. UAMS later relied on Human Resources Policy 4.4.02 in defending unpaid leave. Plaintiff disputes the application of those policies to him and alleges that the adverse administrative process already underway before his response, his immediate exclusion from training, unpaid status, and continued grievance processing impaired the practical operation of his grievance and the terms of his employment.

29. Plaintiff alleges that the combination of an asserted dismissal effective April 16, simultaneous or subsequent characterization of him as being on unpaid administrative

status, cessation of continuing compensation, termination or restriction of institutional access, continued grievance processing, and later administrative processing constituted an unusual employment arrangement that materially affected the terms and conditions of his employment.

30. Based upon the records presently available to him, Plaintiff has not identified a single contemporaneous institutional record clearly establishing when this particular intervening employment status was created, who authorized it, the specific authority under which it was imposed, and the role, if any, that his foreign or J-1 circumstances played in selecting that arrangement.

31. Plaintiff presently lacks access to UAMS's confidential personnel and disciplinary records concerning similarly situated resident physicians. Beginning on April 14, 2025, UAMS terminated or materially restricted his access to institutional systems and records, limiting his ability during the grievance process and thereafter to identify or obtain information concerning UAMS's treatment of other residents facing comparable disciplinary circumstances. Plaintiff therefore does not rely upon a specific comparator as the sole basis for his claim. He relies on the circumstances of his own treatment, including the language-related criticism, timing of the adverse actions, alleged departures from the established framework, unusual handling of his employment status, and UAMS's subsequent reliance upon his J-1 circumstances.

32. UAMS's treatment of similarly situated residents outside Plaintiff's protected group, and contemporaneous communications among the relevant decision-makers, Graduate Medical Education leadership, Human Resources, Employee Relations, and personnel responsible for his J-1 sponsorship-related arrangements, are matters principally within UAMS's

possession and control. They bear upon whether the process applied to Plaintiff materially differed from institutional practice and whether his foreign and J-1 circumstances entered into the selection or implementation of that process.

33. Plaintiff does not contend that every reference to his J-1 status constitutes evidence of national-origin discrimination and recognizes that immigration-related communications may have legitimate administrative purposes. The relevant issue is whether his foreign and J-1 circumstances merely became administrative consequences of an independently made employment decision or instead entered into the selection or implementation of the materially different process applied to him.

34. Plaintiff does not offer these allegations merely to establish procedural errors. He alleges that the adverse judgments about his English-language communication and their role in assessing his performance; program leadership's involvement in his dismissal; his status as the only Russian resident; UAMS's knowledge of his foreign and J-1-dependent circumstances; the timing of the employment restrictions; the alleged departures from the established framework; the unusual and disputed handling of his employment status, compensation, and access during the grievance; and UAMS's own subsequent reliance on his J-1 circumstances, considered together, plausibly support an inference that his Russian national origin affected the challenged decision-making and implementation process and was a motivating factor in the challenged employment treatment.

35. As a result of the challenged conduct, Plaintiff lost employment compensation and clinical-training opportunities and suffered damage to his professional standing and emotional distress. He alleges continuing harm from the disputed training and separation record when seeking further residency, fellowship, and employment opportunities. He seeks recognition

or completion of his first postgraduate year, correction of records affected by discrimination, and an accurate letter for prospective programs and employers.

**COUNT I - NATIONAL-ORIGIN DISCRIMINATION**
**42 U.S.C. § 2000e-2(a)(1) and (m)**

36. Plaintiff incorporates paragraphs 1-35 into this count.

37. Defendant, through the UAMS personnel responsible for Plaintiff's employment, discriminated against Plaintiff because of his Russian national origin in the discipline and restrictions imposed on him, his exclusion from clinical training, the unpaid employment arrangement, and his dismissal and termination. These actions adversely affected his compensation and the terms, conditions, and privileges of employment.

38. Plaintiff alleges that his Russian national origin was a motivating factor in the challenged employment practices, even if other factors also motivated them. Defendant's conduct violated Title VII and caused the harms described above.

**REQUEST FOR RELIEF**

Plaintiff respectfully requests judgment in his favor and the following relief:

A. A declaration that Defendant violated Title VII as alleged in this complaint;

B. Recognition and documentation of completion of Plaintiff's first postgraduate year (PGY-1), to the extent supported by completed training and lawful remedial credit. Alternatively, an impartial, nondiscriminatory assessment of completed rotations and competencies; accurate training credit; and a reasonable opportunity, including reinstatement or placement within Defendant's control where appropriate, to satisfy identified remaining requirements. Any certification must accurately reflect completed training and competencies;

C. Correction of personnel, disciplinary, training, evaluation, and separation entries the Court finds resulted from unlawful discrimination; accurate documentation of the program dismissal and June 11, 2025 employment end date; and correction of inaccurate adverse information Defendant provided to training sponsors, credentialing bodies, or other programs, within Defendant's control and consistent with applicable reporting requirements;

D. An accurate institutional letter for prospective employers, residency programs, and fellowship programs, stating verified employment and training dates, rotations, training credit, properly assessed competencies, and corrected separation or standing information resulting from the judgment. Defendant should provide the same corrected information in responding to authorized verification requests;

E. Back pay, lost employment benefits, and applicable interest attributable to the unlawful discrimination, subject to lawful offsets and mitigation, in amounts established by the evidence;

F. Compensatory damages for proven pecuniary and nonpecuniary losses, including emotional distress, within the limits of 42 U.S.C. § 1981a. Plaintiff does not request punitive damages against this governmental defendant;

G. Taxable costs and, if counsel later appears and the governing standards are met, reasonable attorney's fees authorized by 42 U.S.C. § 2000e-5(k); and

H. Such other and further relief as the Court deems just and appropriate under Title VII.

**JURY DEMAND**

**Under Federal Rule of Civil Procedure 38, Plaintiff demands a jury trial on all issues triable of right by a jury. Equitable remedies are requested from the Court.**

**Respectfully submitted,**

**Dated:** 09/13/2026

**Signature:** Vasilii Khammad

**Vasilii Khammad, Plaintiff pro se**

**1159 Euclid Dr.**

**Charleston, SC 29492**

**Telephone: 614-284-5795**

**Email: vas.khammad@gmail.com**

# EXHIBIT A

EEOC Determination and Notice of Rights

EEOC Charge No. 493-2025-02379

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

**Little Rock Area Office**
820 Louisiana St, Suite 200
Little Rock, AR 72201
(501) 900-6130
Website: www.eeoc.gov

# DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 07/15/2026

**To:** Dr. Vasilii Khammad
1159 Euclid Dr.
CHARLESTON, SC 29492
Charge No: 493-2025-02379

EEOC Representative and email: JOHNNY GLOVER
INVESTIGATOR
JOHNNY.GLOVER@EEOC.GOV

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## DETERMINATION AND NOTICE OF RIGHTS

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

## NOTICE OF YOUR RIGHT TO SUE

This is official notice that the EEOC has dismissed your charge and has issued you notice of your right to sue the respondent(s) on this charge. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of EEOC's official notice of dismissal.** You should keep a record of the date you received the EEOC's official notice of dismissal. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 493-2025-02379.

On behalf of the Commission,

Digitally Signed By:William A Cash
07/15/2026

William A Cash
Area Office Director

**Cc:**
Audrey Bradley
University of Arkansas for Medical Science
4301 W. Markham St.
Little Rock, AR 72205

University of Arkansas for Medical Sciences
4301 W Markham St
LITTLE ROCK, AR 72205

Please retain this Notice for your records.

## INFORMATION RELATED TO FILING SUIT UNDER THE LAWS ENFORCED BY THE EEOC

*(This information relates to filing suit in Federal or State court **under Federal law**. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)*

### IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you *receive* EEOC's official notice of dismissal**. You should **keep a record of the date you received EEOC's official notice of dismissal**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving EEOC's official notice of dismissal (email or envelope).

If your lawsuit includes a claim under the Equal Pay Act (EPA), you must file your complaint in court within 2 years (3 years for willful violations) of the date you did not receive equal pay. This time limit for filing an EPA lawsuit is separate from the 90-day filing period under Title VII, the ADA, GINA, the ADEA, or the PWFA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA, the ADEA, or the PWFA, in addition to suing on the EPA claim, your lawsuit must be filed within 90 days of your receipt of EEOC's official notice of dismissal and within the 2- or 3-year EPA period.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to https://www.eeoc.gov/employees/lawsuit.cfm.

### ATTORNEY REPRESENTATION

For information about locating an attorney to represent you, go to: https://www.eeoc.gov/employees/lawsuit.cfm.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

### HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS

There are two ways to request a charge file: 1) a Freedom of Information Act (FOIA) request or 2) a "Section 83" request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of EEOC's official notice of dismissal, please submit your FOIA and/or Section 83 request for the charge file promptly to allow sufficient time for EEOC to respond and for your review.

**To make a FOIA request for your charge file**, submit your request online at https://eeoc.arkcase.com/foia/portal/login (this is the preferred method). You may also submit a

FOIA request for your charge file by U.S. Mail by submitting a signed, written request identifying your request as a "FOIA Request" for Charge Number 493-2025-02379 to the District Director at Delner Franklin-Thomas, 200 Jefferson Ave Suite 1400, Memphis, TN 38103.

**To make a Section 83 request for your charge file**, submit a signed written request stating it is a "Section 83 Request" for Charge Number 493-2025-02379 to the District Director at Delner Franklin-Thomas, 200 Jefferson Ave Suite 1400, Memphis, TN 38103.

You may request the charge file up to 90 days after receiving EEOC's official notice of dismissal. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA requests, go to https://www.eeoc.gov/eeoc/foia/index.cfm.

For more information on submitted Section 83 requests, go to https://www.eeoc.gov/foia/section-83-disclosure-information-charge-files.

# EXHIBIT B

Signed EEOC Charge of Discrimination

EEOC Charge No. 493-2025-02379

# CHARGE OF DISCRIMINATION

Form 5 (06/24)

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

| CHARGE PRESENTED TO: | AGENCY CHARGE NO. |
|---|---|
| EEOC | 493-2025-02379 |

Name *(indicate Mr., Ms., Mrs., Miss, Dr., Hon., Rev.)*: Dr. Vasilii Khammad

Phone No.: 614-284-5795

Year of Birth: 1994

Mailing Address: 1159 Euclid Dr.
CHARLESTON, SC 29492

Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency that I believe discriminated against me or others.

Name: University of Arkansas for Medical Sciences

No. Employees, Members: 501+ Employees

Phone No.: (501) 686-8000

Mailing Address: 4301 W Markham St
LITTLE ROCK, AR 72205, UNITED STATES OF AMERICA

Name:

No. Employees, Members:

Phone No.:

Mailing Address:

DISCRIMINATION BASED ON:

National Origin, Race, Retaliation

DATE(S) DISCRIMINATION TOOK PLACE

Earliest: 04/14/2025

Latest: 06/12/2025

THE PARTICULARS ARE:

I am a former Pediatrics Medical Resident Physician who was employed with UAMS under a contract from June 17, 2024, to June 30, 2025. According to Human Resources, my final day of employment was on June 11, 2025. My medical training in the U.S. was sponsored by a J-1 visa issued through the Educational Commission for Foreign Medical Graduates (ECFMG). During my employment at UAMS, I was subjected to a pattern of discriminatory and retaliatory treatment as the only resident physician from the Russian Federation in the Pediatrics Residency Program. While the Pediatrics Program Director, Dr. Oriaku Kas-Osoka used institutional authority to serve as the principal decision maker in most events, other senior faculty and institutional official either participated direct or failed to intervene. On September 24, 2024, Dr. Paul J. Drake was removed as my academic advisor, depriving me of critical mentorship without explanation; followed by an unsolicited psychiatric referral issued by Dr. Kas-Osoka on October 7, despite no history or documented concerns and a dehumanizing evaluation on October 9, in which anonymous Emergency Medicine faculty described me as functioning at the level of an "AI" and claimed language is definitely a barrier, despite my certified fluency in four languages. After I raised concerns about the program to her during a public meeting in September-October 2024, and included the following actions: Biased unwarranted criticism of my communication as a non-native English speaker by Dr. Kas-Osoka during a December 17, 2024, meeting with her and Dr. Rachel Millner, Coercive pressure to sign the Focused Review agreement on February 11, 2025, which mandated psychiatric testing under institutional authority and imposed clinical training restrictions based on an anonymous, undated, and unattributed document. Dr. Kas-Osoka actively obstructed my exploratory transfer communications with three institutions: Seattle Children's Hospital (February 17-March 5), Bernard & Millie Dunker Children's Hospital in Albany (March 21 -April 14), and

Kaiser Permanente Oakland Medical Center (April 7-Apirl 14). On April 7, Dr. Kas-Osaka contacted Dr. Nicole Webb at Kaiser Permanent Oakland Medical Center under false pretext and requested documents, including confidential document from my prior work in France. Without my consent or any legal justification, distributed this confidential document through UAMS internal systems to Dr. Rachel Millner and Ms. Leigh Austin on April 8. On April 14, during a meeting convened to close my Focused Review based on positive faculty evaluations, Dr. Kas-Osoka abruptly and publicly accused me, without prior notice, of deceiving multiple faculty members, in front of Drs. Molly Gathright, Rachel Millner, and Richard Blaszak. She confiscated my badge, revoked all institutional access without reinstatement and had me escorted out in front of colleagues as if I was a criminal. I had met with Dr. Kas-Osaka on the matter on March 17 and April 4. On April 15, 2025, Dr. Kas-Osoka issued a termination letter labeling me as having committed gross misconduct. I filed a formal grievance on April 16. On April 15, 2025, Dr. Kas-Osoka issued a termination letter labeling me as having committed gross misconduct and pressured me to sign a federal SEVIS/ECFMG form with false statements for my J-1 visa sponsor, while I remained locked out of all institutional systems. I filed a formal grievance on April 16. However, I was treated as already dismissed and publicly humiliated by Dr. Kas-Osoka and the Pediatrics Department Chair, Dr. William Steinbach, who disclosed my termination to colleagues and began discussing my replacement that same day. On April 18, Dr. Kas-Osoka placed me on unpaid administrative leave, in direct violation of UAMS GMEC Policy 1.410 and my employment contract, both of which guarantee compensation and procedural protection during the grievance process. On April 18, I was placed on unpaid administrative leave. Between April 28 and May 5, 2025, multiple requests for a documented and structured grievance process were denied by Dr. Kas-Osoka who labeled the process informal and disregarded all arguments contesting my dismissal. Under her directive, I was assigned a special escort to the grievance meeting. At the May 5, online grievance meeting with Drs. Kas-Osoka, William Steinbach, Kelly Curran and Richard Blaszak, I was given on a few minutes to speak before being removed from the video conference. After waiting for several hours without further communication, I followed up, only to receive a final decision from Dr. Steinbach that disregarded all submitted arguments and reiterated Dr. Kas-Osoka's original termination letter. Between May 5 and 20, Human Resources repeatedly refused to provide my employment contract preventing my appeal preparation to Dr. Steven Webber, Dean College of Medicine. On June 6, Dr. Webber dismissed my grievance despite the substantial evidence I submitted and without offering any hearing or opportunity to clarify my case. On June 12, I received a contradictory notice from Human Resources falsely listing June 11, as my last workday despite having been unpaid and locked out for two months. I am currently engaged in ongoing psychological consultations to address the severe emotional distress, and the professional and financial harm I have suffered as a direct result of these events.

I believe I was discharged because of my race, national origin, Russian and in retaliation for complaining about discrimination, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct, and that I have read each page of this form.

Digitally Signed By: Dr. Vasilii Khammad
07/16/2025

Charging Party Signature & Date

If a state or local Fair Employment Practices Agency (FEPA) requires notarization, you may need to sign the charge in the presence of a notary. If so, please do so here.

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.

Notarized Signature of Charging Party

Subscribed and sworn to before me this date:

Signature of Notary_____

Printed Name _____

## CP ENCLOSURE WITH EEOC FORM 5 (06/24)

### PRIVACY ACT STATEMENT

Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (06/24).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

### NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so *within 15 days* of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

### NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA, Section 207(f) of GINA, and 42 USC 2000gg-2(f)(1) of the PWFA it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.