

Via Electronic Mail

March 13, 2024

Dr. Sheila Boozer
Champaign Unit 4 School District
502 W. Windsor Road
Champaign, Illinois 61820
boozersh@u4sd.org

RE: Ms. Rebecca Ramey

Dr. Boozer,

Earlier this morning, Ms. Rebecca Ramey attended a meeting with you, Ken Kleber, and Dr. Laura Taylor. (My request to attend this meeting with my client was expressly denied.)

At that meeting, you told Ms. Ramey that she will be transferred from her current position with Booker T. Washington Elementary School to Kenwood Elementary School effective immediately, through the remainder of the school year. You additionally stated that you were “not sure” whether Ms. Ramey would have a position as assistant principal with the District for the next school year.

Inexplicably, you also told my client that one reason for the transfer was allegedly due to the “the issue with [her] wife,” apparently referencing the fact that Ms. Ramey’s spouse, Diana Kistler, has taught first grade at BTW since the 2022-2023 school year.

Moreover, you had been made aware that on March 11, Ms. Ramey filed a Charge of Discrimination with the Illinois Department of Human Rights, alleging (among other things) that the District had discriminated against her on the basis of her sexual orientation. A copy of this Charge is attached. The fact that Ms. Ramey’s relationship with her spouse was even broached at this meeting at all, let alone used as an apparent justification for the transfer, is frankly shocking.

The District’s actions appear punitive and retaliatory, as Ms. Ramey is being transferred from BTW without the option of allowing her to finish out the school year, while simultaneously being told that there is no guarantee of her future employment with the District.

Without mincing words, Ms. Ramey is utterly devastated by the District’s callous decision to transfer her and take her away from the children, families, staff, and community that she has spent the past 5 years working alongside and with whom she has formed close personal and professional relationships. Ms. Ramey has done a tremendous job as an assistant principal at BTW, and no valid reason for her transfer exists.

Govern yourself accordingly.

Ronald S. Langacker

Ronald S. Langacker
Attorney at Law

RSL/jlw

Enc.

CC:

Amy Armstrong
Dr. Gianina Baker
Bruce Brown
Betsy Holder
Mark Thies
Heather Vazquez
Sally Scott

I. BACKGROUND INFORMATION COMMON TO ALL COUNTS

1. Complainant, Ms. Rebecca Ramey (“Ramey” or “Complainant”), is a protected party under the Illinois Human Rights Act, 775 ILCS 5/1-102 *et seq*, as she is Female. Additionally, Complainant identifies as a lesbian, and is married to her same-sex partner, Ms. Diana Hildebrand Kistler Ramey (“Kistler”).
2. Respondent, Champaign Unit 4 School District (“District” or “Respondent”), is an employer as that term is defined by the Illinois Human Rights Act.
3. The current Superintendent of Champaign Unit 4 School District is Dr. Shiela Boozer (“Dr. Boozer”).
4. Complainant was hired as the Assistant Principal for Booker T. Washington Elementary School (“BTW”) in August of 2019. BTW primarily serves a student population of color in the City of Champaign.
5. The Principal of BTW is Mr. Jaime Roundtree (“Roundtree”).
6. Complainant’s spouse, Ms. Kistler, is employed as a First-Grade Teacher at BTW. Kistler is a member of the Teacher’s Union of the Champaign Unit 4 School District.
7. District Administration, including Dr. Boozer, are aware that Complainant and Kistler are married in a same-sex relationship.
8. On September 14, 2023, there were gunshots fired outside of BTW at approximately 2:50 p.m., while students were outside at extra recess. Complainant, Roundtree, and other BTW staff members took immediate action to secure the safety of the students and the school. Dr. Boozer did not come to the school to assess the welfare of students and staff.
9. At the September 26, 2023 Regular School Board Meeting of the Champaign Unit 4 School District, many community members expressed their dissatisfaction with how District Administration had handled the response to the shooting.
10. Kistler spoke during public comment and was critical of District Administration’s response and of Boozer in particular.
11. On or about late October 2023, an investigation was opened into Complainant allegedly violating District policy regarding dispensing medication to students without an updated Student Medical Authorization form. (Declaration of Jamie Roundtree, ¶10)
12. Principal Roundtree conducted an internal investigation into the matter and in a November 19, 2023 memorandum, recommended that Complainant be counseled on District policy and given a written reprimand. (Decl. of Jamie Roundtree, ¶11)
13. District Administration, specifically Human Resources Director Mr. Ken Kleber (“Kleber”), did not accept Roundtree’s recommended discipline and instead gave Complainant a 5-day unpaid suspension. (Decl. of Jamie Roundtree, ¶12)

14. Roundtree expressed his belief that the severity of Complainant's punishment was because of Complainant's sexual orientation. (Decl. of Jamie Roundtree, ¶15)
15. Roundtree additionally expressed his belief that District Administration sought to retaliate against Complainant after Complainant's wife, Ms. Kistler, spoke against the District Administration at the September 26 School Board Meeting. (Decl. of Jamie Roundtree, ¶13)
16. Shortly after Complainant's suspension, Roundtree was advised by Laura Taylor that Dr. Boozer and Kleber intended to transfer Complainant from her position at BTW. Taylor told Roundtree that "the decision had been made." (Decl. of Jamie Roundtree, ¶14)
17. Roundtree expressed his belief that Complainant's transfer was the result of her sexual orientation as well as her relationship with Ms. Kistler, who had been openly critical of the District's response to the shooting in September of 2023. (Decl. of Jamie Roundtree, ¶15)

II. A. ISSUE/BASIS

Discrimination – On the Basis of Gender/Sexual Orientation

B. PRIMA FACIE ALLEGATIONS

1. Complainant repeats and re-alleges the previous paragraphs in this Charge as if fully set forth herein.
2. Complainant is a member of a protected class in that she identifies as a lesbian and is married to her same-sex partner.
3. Complainant met and exceeded the reasonable expectations of her employment.
4. Complainant experienced discrimination from District Administration when she was given a 5-day unpaid suspension as a result of her sexual orientation.
5. Moreover, Complainant suffered an adverse action when the District made the decision to transfer Complainant as a result of her sexual orientation.
6. Other District employees who were not married or otherwise similarly situated were not discriminated against by District Administration.

III. A. ISSUE/BASIS

Discrimination – On the Basis of Marital Status

B. PRIMA FACIE ALLEGATIONS

1. Complainant repeats and re-alleges the previous paragraphs in this Charge as if fully set forth herein.

2. Complainant is a member of a protected class in that she is married to her same-sex partner.
3. Complainant met and exceeded the reasonable expectations of her employment.
4. Complainant experienced discrimination from District Administration when she was given a 5-day unpaid suspension as a result of her same-sex marital status.
5. Moreover, Complainant suffered an adverse action when the District made the decision to transfer Complainant as a result of her s same-sex marital status.
6. Other District employees who were not married or otherwise similarly situated were not discriminated against by District Administration.

DECLARATION OF JAIME ROUNDTREE

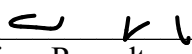
I, Mr. Jaime Roundtree, being duly sworn and under oath, am over 21 years of age and under no legal disability, state that, if called as a witness, I would competently testify to the following:

1. My name is Jaime Roundtree. I have served as the Principal of Booker T. Washington Elementary School (“BTW”) in Champaign, Illinois since August 2019. I have not been previously deposed in this matter.
2. I am currently employed by Champaign Unit 4 School District (“District”), and have been an employee of the District since 2005. The current Superintendent of the District is Dr. Sheila Boozer.
3. Ms. Rebecca Ramey (“Ms. Ramey”) is currently an Assistant Principal at BTW. Ms. Ramey has consistently met and exceeded expectations as an administrator at BTW.
4. Ramey is married to Diana Hildebrand Kistler Ramey (“Ms. Kistler”), who also works at BTW as a First Grade Teacher. The fact that Rebecca and Diana are married has in no way affected the work environment at BTW, and the District does not have any policy against married couples being employed with the District or within the same building.
5. On September 14, 2023, there were gunshots fired outside of BTW at approximately 2:50 p.m., while many students were outside for extra recess.
6. Ms. Ramey and I both responded to the emergency situation happening on school grounds. Dr. Boozer did not come to the school immediately following the shooting, and many teachers and parents were upset about how the situation was handled.
7. At the School Board meeting on September 26, 2023, several teachers and parents spoke out about the lack of support from District Administration at the time of the shooting.
8. One person who spoke out at public comments was Ms. Kistler, who was critical of Administration’s response and of Dr. Boozer in particular. While I did not make any comments at the meeting, Ms. Ramey and I attended the meeting in support of the BTW community.
9. Subsequent to Ms. Kistler’s comments, District Administration began to actively discriminate against Ms. Ramey.
10. Around late October 2023, there was an incident involving Ms. Ramey failing to follow District protocol in dispensing medication without an updated Student Medical Authorization form. I commenced an investigation into the incident on behalf of the District.

11. During the Investigation, I found that while there had been a technical violation of policy, no harm had occurred to the child, and that Ms. Ramey had not engaged in any reckless or negligent actions. In consideration of the fact that this was a first-time offense that could easily be remedied with education, I felt the appropriate discipline for Ms. Ramey was a written reprimand and issued a memorandum with my recommendation on November 19, 2023.
12. District Administration rejected my assessment and instead issued Ms. Ramey a five-day suspension, without pay. I believe this punishment was excessive.
13. I believe that Ms. Ramey was only disciplined so severely due to her sexual orientation and her relationship with Ms. Kistler, who had been openly critical of the District Administration's response to the shooting in September of 2023.
14. On December 12, 2023, I was advised by Laura Taylor that Dr. Boozer and Ken Kleber had informed her that "the decision had been made" to transfer Ms. Ramey from BTW to a different school within the District.
15. I believe the reason that District Administration decided to transfer Ms. Ramey from BTW to another school is because of her sexual orientation and her relationship with Ms. Kistler, who had been openly critical of the District Administration's response to the shooting in September of 2023.
16. Under penalties as provided by law pursuant to 28 U.S.C. 1746, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes to be true.

FURTHER AFFIANT SAYETH NOT.

Date: 3-11-2024



Jaime Roundtree
Affiant