



Anne S. Soileau  
Director

**State of Louisiana**  
**DEPARTMENT OF STATE CIVIL SERVICE**  
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September 25, 2008

**NOTICE OF APPEAL**  
**TO THE STATE CIVIL SERVICE COMMISSION**

**EMPLOYEE:**

Susan Hill  
P. O. Box 615  
Brusly, LA 70719

**AGENCY:**

Scott Angelle, Secretary  
Department of Natural Resources  
P. O. Box 94396  
Baton Rouge, LA 70804-9396

**EMPLOYEE'S ATTORNEY:**

None

**AGENCY'S ATTORNEY:**

Mark E. Falcon  
Avant & Falcon  
Attorneys at Law  
P. O. Box 2667  
Baton Rouge, LA 70821

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**Susan Hill vs. Department of Natural Resources—Office of Coastal Restoration**

DOCKET NO: **S-16490**

DATE RECEIVED: **September 24, 2008**

POSTMARK DATE: **N/A**

HOW RECEIVED: **E-Mailed**

ASSIGNED TO: **Roxie F. Goynes**

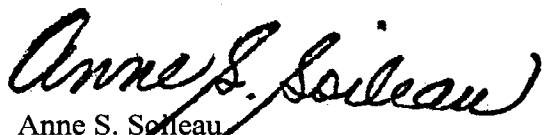
LOCATION: **Baton Rouge**

This appeal has been received and filed. The fact that it has been docketed does not constitute an opinion as to its sufficiency.

**Notice:** This case will probably be set for hearing within the next 40 to 90 days. To aid in scheduling, the Referee has asked that you file your witness and document list within 15 calendar days of the date on this notice. A form is attached for your convenience. Thank you for your cooperation

Attached is information about the appeal/investigation process (the yellow sheet). **PLEASE READ IT.** It answers commonly asked questions and suggests ways to help the Appeals Section process its caseload. **IF YOU DO NOT RECEIVE A YELLOW SHEET WITH THIS NOTICE, CALL THE APPEALS SECTION.**

Sincerely,

  
Anne S. Soileau  
Director

cc: Mary Ginn, HR Director

AP:AS:dl

\*\*\*NOTE: We accept all filings by FAX 225.342.8058 and by e-mail dscs.appeals@la.gov

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**AN EQUAL OPPORTUNITY EMPLOYER**

NAME: Susan Hill

Address: \_\_\_\_\_

Employee #: \_\_\_\_\_

## 1. What action are you appealing?

All bad faith actions taken against me due to sex discrimination and retaliation because of prior sex discrimination claims and other claims, including my prior appeal of "Reduction in Pay" with associated "Pre-Deprivation Notice," "Letter of Counseling," "Pre-Termination Notice," "Termination Notice" among other actions. Defendants' misconduct has prevented me from being able to understand, know, or identify the extent of my claims and harms suffered.

## 2. What state agency took the action you are appealing?

Louisiana Department of Natural Resources

3. What is your status? ☒ permanent ☐ probational ☐ provisional  
☐ job appointee ☐ restricted ☐ unclassified

4. Did you receive written notice of the action? Yes ☒ No ☐5. If so, when? attached A copy of the notice must be attached. If not, how and when did you learn about the action?

## 6. Why, generally, are you appealing the action?

"Reduction in Pay" disciplinary action is retaliation for exercising my Constitutional and statutory rights. Defendants fail to identify with specificity in the "Reduction in Pay" disciplinary action the who, when, where, what, why, how, etc. of actions/statements purportedly occurring; defendants fail to identify which policy/rule is claimed to be violated by purported actions and prior speech with retroactive discipline without notice was imposed. The "Letter of Counseling" given at the same exact time as the "Pre-Deprivation Notice" for the same purported speech/objections that defendant may have wanted ceased cannot be considered as "notice" upon which to base the "Reduction in Pay" discipline. Termination action is retaliation and has no authorization; action relies on prior free speech for which plaintiff was already disciplined and said discipline action, the "Reduction in Pay" disciplinary action by letter dated July 3, 2006 is under appeal. Defendants are aware that their retaliatory "Letter of Counseling" and disciplinary actions taken against me are under scrutiny and appeal; defendants know of their own misconduct and know that I am entitled to relief for their bad faith "Reduction in Pay" letter. Defendants have engaged in continuing and ongoing conduct including retaliation for prior grievance action/numerous complaints of sex discrimination; intimidation and threats of further retaliation; harassment; creating a hostile work environment; intimidation, punishment, material misrepresentations, and other tactics to prevent me from exercising my constitutional right of access to courts increasingly escalating with DNR on notice I was in the 90 day time frame having received my EEOC right to sue letter, defamation, abuse of process of Louisiana Civil Service Rules and Article among other abuses of process, bad faith "complaint" about me by Maury Chatellier with corresponding bad faith "investigation" of me by lawyer Mark Falcon, caused my detrimental reliance, made material misrepresentations, false claims of statements purportedly made by me, among other actions and inactions. Because of sex discrimination, retaliation, among other defendants' actions, state actors created and subjected me immediate, continued, ongoing, and intensifying and terrorizing danger and harm. Defendants knew of the dangerous actions and harms they were inflicting upon me and were on notice at all times of the consequences of their actions that defendants caused me to suffer. Defendants are fully aware that at all times specified, I was on leave verbally approved by my designated leave approver, my manager Karim Belhadjali as I was at all times in compliance with the leave directives imposed upon me. Defendants engaged in bad faith entrapment actions during this time; I was denied access to my Outlook email and denied access to LEO. Once I demanded restoration of my rights of access, my LEO access was restored; however, my Outlook email access was not restored and during this time, I was never able to successfully access my Outlook email. After my LEO access was restored, I then properly followed-up electronically for my prior approved leave by submissions in LEO with the reason clearly specified in the text box. However, I was subjected to further retaliation by Karim Belhadjali when he electronically rejected my follow-up actions for my prior approved leave, obtained through my compliance with the leave directives imposed upon me. I was subjected to further retaliation from Kirk Rhinchant placing me on leave without pay, the bad faith "Reduction in Pay" disciplinary action, the bad faith "Pre-Termination Notice", the bad faith "Termination Notice", among other state actions involving illegal acts of discrimination, retaliation, denials and deprivations of my constitutional and statutory rights among other harms defendants caused me.

## 7. What relief are you seeking?

Immediate restoration of all my pay/benefits (health insurance, life insurance, retirement, etc.), reversal and/or dismissal of all of defendants' bad faith "disciplinary" and other actions taken against me, backpay, among other forms of relief, demand for immediate investigation of defendants' misconduct, demand to be immediately placed on Paid Special Leave, because of defendants deliberate indifference to my rights and causing me to suffer from continued, ongoing, and intensifying and terrorizing state-created danger and harm, during the period of time required for the investigation of defendants' misconduct and corresponding identification and resolution of all legal matters related to defendants actions which include sex discrimination, unconstitutional deprivation of my rights, statutory violations, among other actions.

Susan Hill



S-16490

✓ Docket  
 ✓ Enroll Counsel  
 ✓ Flag BB Code 2- REG  
1301- Dismissal 172755  
 Need Letter  
110043100 E-mail 9/24/08

**Donna Kaye Brittain**

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**From:** S H  
**Sent:** Wednesday, September 24, 2008 12:08 AM  
**To:** DSCS Appeals  
**Subject:** SUSAN HILL - Civil Service Appeal - email 2A of 2 (pages 1-14 of 28)  
**Attachments:** Termination Notice dated August 22, 2008, pages 1-14 of 28.pdf

[dscs.appeals@la.gov](mailto:dscs.appeals@la.gov)