

Memo

To: Desmon Martin, Chief of Enforcement and Compliance
From: Denise M. Johnson, Chief Administrative Law Judge
Date: October 10, 2008
Re: *Daniel J. Phillips v. Helen Fuldauer and Douglas Fuldauer*
[CLE] H4092104 [36147] 05232005 05 – 05 – 0889 – 8
Complaint No. 9983

*Fair Housing Resource Center v. Helen Fuldauer and
Douglas Fuldauer*
[CLE] H4101704 [35923] 03102005 05 – 05 – 0590 – 8
Complaint No. 9963

**CONSIDERATION OF
ADMINISTRATIVE LAW JUDGE'S REPORT**

ALJ RECOMMENDS CEASE & DESIST ORDERS

Report issued: October 10, 2008

Report mailed: October 10, 2008

**** Objections due: October 27, 2008 ****



Governor
Ted Strickland

Ohio Civil Rights Commission

Board of Commissioners

Eddie Harrell, Jr.
Leonard J. Hubert
Atlagracia Ramos
Rashmi N. Yagnik

G. Michael Payton, Executive Director

October 10, 2008

Daniel J. Phillips
38720 Adkins Road
Willoughby, OH 44094

Jesse M. Schmidt, Esq.
55 Public Square, Suite 1414
Cleveland, OH 44113

Patricia Kidd, Executive Director
Fair Housing Resource Center
54 South State Street, Suite 303
Painesville, OH 44077

David G. Oakley, Esq.
Fair Housing Law Clinic
3214 Prospect Avenue East
Cleveland, OH 44115-2600

Re: *Daniel J. Phillips v. Helen Fuldauer and Douglas Fuldauer*
[CLE] H4092104 [36147] 05232005 05 - 05 - 0889 - 8 Complaint No. 9983

Fair Housing Resource Center v. Helen Fuldauer and Douglas Fuldauer
[CLE] H4101704 [35923] 03102005 05 - 05 - 0590 - 8 Complaint No. 9963

Enclosed is a copy of the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendations (ALJ's Report). You may submit a Statement of Objections to the ALJ's Report within twenty (20) days from the mailing date of this report.

Pursuant to Ohio Admin. Code § 4112-1-02, your Statement of Objections must be **received** by the Commission no later than **Monday, October 27, 2008**. *No extensions of time will be granted.*

Any objections received after this date will be **untimely filed** and cannot be considered by the Ohio Civil Rights Commission.

Please send the original Statement of Objections to: **Desmon Martin, Chief of Enforcement and Compliance, Ohio Civil Rights Commission, State Office Tower, 5th Floor, 30 East Broad Street, Columbus, OH 43215-3414.** All parties and the Administrative Law Judge should receive copies of your Statement of Objections.

FOR THE COMMISSION

Desmon Martin / tg

Desmon Martin
Chief of Enforcement and Compliance

DM:tg

cc: Susan A. Choe, Esq. - Wayne D. Williams, Esq.
Denise M. Johnson, Chief Administrative Law Judge

Enclosure

CENTRAL OFFICE • State Office Tower, 5th Floor, 30 East Broad Street, Columbus, OH 43215-3414
• Central Office: 614 - 466 - 2785 • TOLL FREE: 1 - 888 - 278 - 7101 • TTY: 614 - 466 - 9353 • FAX: 614 - 644 - 8776

REGIONAL OFFICES
AKRON • CINCINNATI • CLEVELAND • COLUMBUS • DAYTON • TOLEDO
www.crc.ohio.gov

OHIO CIVIL RIGHTS COMMISSION

IN THE MATTER OF:

DANIEL J. PHILLIPS

AND

**FAIR HOUSING
RESOURCE CENTER**

Complainants

v.

**HELEN FULDAUER AND
DOUGLAS FULDAUER**

Respondents

**CHIEF ADMINISTRATIVE LAW JUDGE'S FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND RECOMMENDATIONS**

**NANCY H. ROGERS
ATTORNEY GENERAL**

Wayne D. Williams, Esq.
Associate Attorney General
Civil Rights Section
State Office Building, 11th Floor
615 West Superior Avenue
Cleveland, OH 44113-1899
216 - 787 - 3030

Counsel for the Commission

David G. Oakley, Esq.
Fair Housing Law Clinic
3214 Prospect Avenue East
Cleveland, OH 44115-2600

Counsel for Complainant FHRC

Daniel J. Phillips
38720 Adkins Road
Willoughby, OH 44094

Complainant

Complaint No. 9983
[CLE] H4092104 [36147] 05232005
05 - 05 - 0889 - 8

Complaint No. 9963
[CLE] H4101704 [35923] 03102005
05 - 05 - 0590 - 8

Jesse M. Schmidt, Esq.
55 Public Square, Suite 1414
Cleveland, OH 44113
216 - 771 - 1414

Counsel for Respondents

Patricia Kidd, Executive Director
Fair Housing Resource Center
54 South State Street, Suite 303
Painesville, OH 44077

Complainant

ALJ'S REPORT BY:

Denise M. Johnson
Chief Administrative Law Judge
Ohio Civil Rights Commission
State Office Tower, 5th Floor
30 East Broad Street
Columbus, OH 43215-3414
614 - 466 - 6684

INTRODUCTION AND PROCEDURAL HISTORY

Fair Housing Resource Center (Complainant FHRC) and Daniel J. Phillips (Complainant Phillips) filed separate sworn charge affidavits with the Ohio Civil Rights Commission (the Commission) on May 10, 2005, and May 23, 2005, respectively.

The Commission investigated and found probable cause that unlawful discriminatory practices had been engaged in by Helen Fuldauer and Douglas Fuldauer (Respondents) in violation of Revised Code Section (R.C.) 4112.02(H).

The Commission issued Complaint, Notice of Right of Election, and Notice of Hearing No. 9963 [FHRC] on November 17, 2005 and Amended Complaint, Notice of Right of Election, and Notice of Hearing No. 9983 [Phillips] on February 2, 2006. The Commission attempted conciliation prior to the issuance of Complaint Nos. 9963 and 9983. The Complaints were scheduled for hearing after conciliation efforts failed.

Complaint No. 9983 alleges that on or about September 21, 2004, and continuing there from, Respondents failed and refused to make their housing accommodations available for rent or lease to Complainant Phillips, and otherwise refused to offer him reasonable accommodation, for reasons not applied equally to all persons without regard to their disability and familial status.

Complaint No. 9963 alleges that Respondents failed and refused to rent housing accommodations to persons not applied equally alike to all persons without regard to their disability and familial status. Further, the Complaint alleges that the actions of Respondents caused Complainant RHRC to divert its resources to remedy the unlawful discriminatory acts of Respondents.

Respondents filed timely answers to Complaint Nos. 9963 and 9983 on December 27, 2005 and March 22, 2006, respectively, admitting certain factual allegations, but denying that they engaged in any unlawful discriminatory practices.

A public hearing was held on November 29, 2006 at the Administration Building Assembly Room, 105 Main Street, Painesville, Ohio.

The record consists of the previously described pleadings; a transcript consisting of 58 pages of testimony; exhibits admitted into evidence at the hearing; and the post-hearing briefs filed by the Commission on June 29, 2007; by Respondent on July 10, 2007; and a Reply Brief by the Commission on July 17, 2007.¹

¹ The Commission's post-hearing brief did not contain a legal argument pertaining to familial status discrimination.

FINDINGS OF FACT

The following findings are based, in part, upon the Administrative Law Judge's [ALJ] assessment of the credibility of the witnesses who testified before her in this matter. The ALJ has applied the tests of worthiness of belief used in current Ohio practice. For example, she considered each witness's appearance and demeanor while testifying. She considered whether a witness was evasive and whether his or her testimony appeared to consist of subjective opinion rather than factual recitation. She further considered the opportunity each witness had to observe and know the things discussed; each witness's strength of memory; frankness or the lack of frankness; and the bias, prejudice, and interest of each witness. Finally, the ALJ considered the extent to which each witness's testimony was supported or contradicted by reliable documentary evidence.

1. Complainant FHRC filed a sworn charge affidavit with the Commission on March 10, 2005.

2. The Commission determined on October 27, 2005 that it was probable that unlawful discriminatory practices had been engaged in by Respondents in violation of R.C. 4112.02(H).

3. The Commission attempted and failed to eliminate the alleged unlawful discriminatory practices by informal methods of conciliation.

4. The Commission issued Complaint, Notice of Right of Election, and Notice of Hearing No. 9963 on November 17, 2005.

5. Complainant Phillips filed a sworn charge affidavit with the Commission on May 23, 2005.

6. The Commission determined on October 6, 2005 that it was probable that unlawful discriminatory practices had been engaged in by Respondents in violation of R.C. 4112.02(H).

7. The Commission attempted and failed to eliminate the alleged unlawful discriminatory practices by informal methods of conciliation.

8. The Commission issued Amended Complaint, Notice of Right of Election, and Notice of Hearing No. 9983 on February 2, 2006.

9. Respondents are providers of housing accommodations located at 29020 Hazel Avenue, Wickliffe, Lake County, Ohio.

10. Complainant Phillips is blind and needs the assistance of a guide dog, and is medically diagnosed with Mental Retardation and Developmental Disabilities (MRDD).

11. Complainant Phillips is employed full-time at the Wickliffe Workshop and receives Social Security disability income.

12. Complainant Phillips is financially self-sufficient, and maintains an independent lifestyle with the assistance of RAYS, an organization that helps people who have MRDD with daily living skills.

13. Complainant FHRC is a non-profit organization that promotes equal housing opportunities within Lake County. Patricia Kidd (Kidd) is the organization's Executive Director.

14. During the summer of 2004 Complainant Phillips was seeking to move to a house from the apartment he was currently living in. He was having difficulty locating housing because he was running into problems because of his guide dog. His RAYS caseworker referred him to Complainant FHRC.

15. Kidd met with Complainant Phillips and conducted an intake and complaint investigation.

16. Kidd went through newspapers with Complainant Phillips and read available ads to him.

17. On October 11, 2004, Kidd contacted Respondent Helen Fuldauer in response to an ad placed in *The News Herald* for an available house for rent on Hazel Street in Wickliffe, Ohio.

18. The ad specified no pets were allowed.

19. Kidd spoke to Respondent Fuldauer and identified herself as a representative of the FHRC and told her that Complainant Phillips is blind and uses a guide dog.

20. Respondent Helen Fuldauer refused to waive her no pets policy for Complainant Phillip's guide dog.

21. Complainant FHRC then conducted a complaint-based test on Respondents regarding the availability of housing on Hazel Street in Wickliffe, Ohio.

22. Complainant FHRC sent a site-impaired tester to Respondents' property.

23. The site-impaired tester met with Respondent Douglas Fuldauer, who manages the property for his mother, Respondent Helen Fuldauer.

24. The tester told Respondent Douglas Fuldauer that he would be getting a guide dog.

25. Respondent Douglas Fuldauer called the tester several days later and stated that, after speaking with his mother, they could not permit the guide dog due to their no pets policy.

CONCLUSIONS OF LAW AND DISCUSSION

All proposed findings, conclusions, and supporting arguments of the parties have been considered. To the extent that the proposed findings and conclusions submitted by the parties and the arguments made by them are in accordance with the findings, conclusions, and views stated herein, they have been accepted; to the extent they are inconsistent therewith, they have been rejected. Certain proposed findings and conclusions have been omitted as not relevant or as not necessary to a proper determination of the material issues presented.

1. The Commission alleges in Complaint No. 9983, *inter alia*, that Respondents denied Complainant Phillips equal opportunity to rent available housing accommodations because of his disability. The Commission also alleges in Complaint No. 9963, *inter alia*, that the actions of Respondents thwarted Complainant FHRC's goals of providing non-discriminatory housing, and caused it to divert its

resources to remedy the unlawful discriminatory acts of Respondents.

2. These allegations, if proven, would constitute a violation of R.C. 4112.02, which provides, in pertinent part, that:

It shall be an unlawful discriminatory practice:

(H) For any person to:

- (1) Refuse to ... rent, ... housing accommodations, ... or *otherwise deny or make unavailable housing accommodations* because of disability, ...² [Emphasis added.]
- (4) Discriminate against any person in the terms or conditions of ... renting, leasing, ... or use of any housing accommodations, because of disability, ...

² R.C. 4112.02(H)(1) applies to the availability of housing. This provision reaches "every practice which has the effect of making housing more difficult to obtain on prohibited grounds", including denying a prospective tenant equal opportunity to rent housing accommodations. *United States v. City of Parma, Ohio*, 494 F.Supp. 1049, 1053 (N.D. Ohio 1980, *affd as modified*), 661 F.2d 562 (6th Cir. 1981).

3. The Commission has the burden of proof in cases brought under R.C. Chapter 4112. The Commission must prove a violation of R.C. 4112.02(H) by a preponderance of reliable, probative, and substantial evidence. R.C. 4112.05(E) and (G).

4. Federal case law applies to alleged violations of R.C. Chapter 4112. *Little Forest Med. Ctr. of Akron v. Ohio Civil Rights Comm.*, (1991), 61 Ohio St.3d 607. Therefore, reliable, probative, and substantial evidence means evidence sufficient to support a finding of unlawful discrimination under the federal Fair Housing Act of 1968 (Title VIII), as amended.

5. The same standards of proof that apply to employment discrimination cases generally apply to housing discrimination cases.³ Normally, these standards require the Commission to first prove a *prima facie* case of housing discrimination. *McDonnell*

³ Although the Supreme Court has never addressed the issue, "... lower courts have generally assumed that ... precedents from the employment discrimination field should be followed in interpreting Title VIII." R. Schwemm, *Housing Disc.*, 1996 Ed. at 10-2.

Douglas Corp. v. Green, 411 U.S. 792, 5 FEP Cases 965 (1973). The proof required to establish a *prima facie* case may vary on a case-by-case basis. *Id.*, at 802, 5 FEP Cases at 969, n.13. In this case, the Commission may establish a *prima facie* case of housing discrimination by proving that:

- (1) Complainant is a member of a protected class;
- (2) Complainant expressed interest in viewing available housing accommodations; and
- (3) Respondent subjected Complainant to disparate treatment after he expressed interest in viewing housing accommodations under circumstances which give rise to an inference of unlawful discrimination.

6. The Commission proved a *prima facie* case of housing discrimination.⁴ The Commission established the first element of a *prima facie* case because Complainant Phillips, a sight-impaired person, is a member of a protected class based on his disability.

⁴ The burden of establishing a *prima facie* case of discrimination is not onerous. *Texas Dept. of Community Affairs v. Burdine*, 450 U.S. 248, 254, 25 FEP Cases 113, 116 (1981). It is simply part of an evidentiary scheme "intended progressively to sharpen the inquiry into the elusive factual question of intentional discrimination." *Id.*, at n.8.

7. The Commission established the second element with the testimony of Patricia Kidd, the Executive Director of Complainant FHRC. Kidd testified that after her agency was contacted by Complainant Phillips she called Respondents, based on an advertisement they placed in *The News Herald* for rental of available housing accommodations.

8. The Commission established the third element of a *prima facie* case with Kidd's testimony about her conversations with Respondents. Kidd's testimony shows that Respondents subjected Complainant Phillips to disparate treatment under circumstances which give rise to an inference of disability discrimination.

9. The Commission having established a *prima facie* case, the burden of production shifted to Respondents to "articulate some legitimate, nondiscriminatory reason" for their actions. *McDonnell Douglas, supra* at 802, 5 FEP Cases at 969. To meet this burden of production, Respondent must:

"... clearly set forth, through the introduction of admissible evidence," reasons for ... [her] actions which, *if believed by the trier of fact*, would support a finding that unlawful discrimination was not the cause of ... [her actions].

St. Mary's Honor Center v. Hicks, 113 S. Ct. 2742, 2747, 62 FEP Cases 96, 99 (1993), *quoting Burdine, supra* at 254-255, 25 FEP Cases at 116.

10. Respondent Douglas Fuldauer admitted that he and his mother refused to rent to Complainant Phillips because he had a dog. Respondents then attempted to articulate a legitimate non-discriminatory reason for refusing to rent to Complainant Phillips because he had a dog.

11. Respondents attempted to cast doubt on whether or not it was clearly communicated to them by Complainant FHRC that Complainant Phillip's dog was a service dog or guide dog. I found Respondent Douglas Fuldauer's testimony was not credible.

12. The Commission also introduced credible evidence that Respondent Helen Fuldauer also refused to waive the no pets policy

for Complainant Phillips even after Kidd explained to Respondents that Complainant Phillips is blind and requires the use of a service dog to accommodate his disability.

13. The conduct engaged in by Respondents is an illegal violation of R.C. 4112.02(H).

DAMAGES

14. When there is a violation of R.C. 4112.02(H), the statute requires an award of actual damages shown to have resulted from the discriminatory action, as well as reasonable attorney's fees. R.C. 4112.05(G)(1). The statute also provides that the Commission, in its discretion, may award punitive damages.

ACTUAL DAMAGES

15. The purpose of an award of actual damages in a fair housing case, as in employment discrimination cases:

... is to put [the Complainant] in the same position, so far as money can do it, as ... [the Complainant] would have been had there been no injury or breach of duty ..."

Lee v. Southern Home Sites Corp., 429 F.2d 290, 293 (5th Cir. 1970) (citations omitted).

To that end, victims of housing discrimination may recover damages for tangible injuries such as economic loss and intangible injuries such as humiliation, embarrassment, and emotional distress. See *Steele v. Title Realty Co.*, 478 F.2d 380 (10th Cir. 1973) (actual damages of \$1,000 awarded to plaintiff consisting of \$13.25 in telephone expenses, \$125.00 in moving and storage expenses, and \$861.75 for emotional distress and humiliation). Damages for intangible injuries may be established by testimony or inferred from the circumstances.⁵ *Seaton v. Sky Realty Co., Inc.*, 491 F.2d 634, 636 (7th Cir. 1974).

⁵ Although emotional injuries are difficult to quantify, "courts have awarded damages for emotional harm without requiring proof of the actual value of the injury." *HUD v. Paradise Gardens*, P-H: Fair Housing-Fair Lending Rptr. ¶25,037, 25,393 (HUD ALJ 1992), citing *Block v. R. H. Macy & Co.*, 712 F.2d 1241, 1245 (8th Cir. 1983) (other citations omitted). The determination of actual damages from such injuries "lies in the sound discretion of the Court and is essentially intuitive." *Lauden v. Loos*, 694 F.Supp. 253, 255 (E.D. Mich. 1988).

16. In this case, there was no evidence introduced by the Commission regarding how the conduct of Respondents affected Complainant Phillips' emotionally. There is evidence regarding the inconvenience caused to Complainant Phillips in regard to the search for an acceptable housing accommodation. It can be inferred from the circumstances that the actions of Respondents caused Complainant Phillips inconvenience. For the inconvenience suffered by Complainant Phillips he is awarded \$500.00 for actual damages.

17. The Commission introduced evidence that Complainant FHRC expended \$2,989.48 in the investigation of Complainant Phillips' complaint of housing discrimination. (Comm. Ex. 2)

18. Complainant FHRC is, therefore, awarded \$2,989.48 for actual damages.

PUNITIVE DAMAGES

19. The purpose of an award of punitive damages pursuant to R.C. 4112.05(G) is to deter future illegal conduct. Ohio Administrative Code (O.A.C.) 4112-6-02. Thus, punitive damages are appropriate "as a deterrent measure" even when there is no proof of actual malice. *Schoenfelt v. Ohio Civil Right Comm.*, (1995), 105 Ohio App.3d 379, 385, *citing and quoting, Marr v. Rife*, 503 F.2d 735, 744 (6th Cir. 1974).

20. The amount of punitive damages depends on a number of factors, including:

- The nature of Respondents' conduct;
- Respondents' prior history of discrimination;
- Respondents' size and profitability;
- Respondents' cooperation or lack of cooperation during the investigation of the charge; and

- The effect the Respondents' actions had upon the Complainants.⁶

O.A.C. 4112-6-01.

21. Applying the foregoing criteria to this case:

- Respondents' actions were intentional and wanton. Respondent Douglas Fuldauer, under cross examination, testified as follows:

Q: Mr. Williams: Now in the fall of 2004 (...) you were seeking a renter or a tenant for 28290 [sic, 29020], is that correct?

A: Mr. Fuldauer: Yes.

Q: Mr. Williams: And you advertised that house in the paper and you advertised in *The News Herald*?

A: Mr. Fuldauer: Yes.

Q: Mr. Williams: And in the fall of 2004, you met at the property and showed that Hazel Avenue property at 28920 [sic, 29020] to a blind person?

A: Mr. Fuldauer: Yes.

⁶ This criteria is more appropriately considered when determining actual damages.

Q: Mr. Williams: And that blind person indicated to you that they had a guide dog?

A: Mr. Fuldauer: No.

Q: Mr. Williams: What did they indicate to you?

A: Mr. Fuldauer: The blind person indicated that he was going to get a dog but he never mentioned that it was a service dog ... a guide dog or what kind of dog. It was never mentioned what the dog was for.

Q: Mr. Williams: Did you ask him what kind of dog he was getting?

A: Mr. Fuldauer: No.

Q: Mr. Williams: Did he ask you if you would accept a dog?

A: Mr. Fuldauer: Yes.

Q: Mr. Williams: And you said to him that you would not accept a dog, is that correct?

A: Mr. Fuldauer: That is correct.

Q: Mr. Williams: But you didn't have any conversation with him regarding what type of dog it was?

A: Mr. Fuldauer: No.

Q: Mr. Williams: And it was clear to you that person was blind?

A: Mr. Fuldauer: Yes.

(Tr. 41-42)

- The Commission did not present any evidence that there were previous findings of unlawful discrimination against Respondents;
- The Commission did present evidence at the hearing about the size of the housing accommodations, the income and assets of Respondents and the profitability of the housing accommodations (Tr. 37-40); and
- Neither the Commission nor Respondents presented any evidence regarding Respondents' cooperation or lack of cooperation during the investigation.

22. Based on the foregoing discussion, the ALJ recommends that Respondents be assessed punitive damages in the amount of \$1,500 to Complainant Phillips and \$500 to Complainant FHRC.

ATTORNEY'S FEES

23. The Commission is entitled to attorney's fees. R.C. 4112.05(G)(1); *Schoenfelt, supra*, at 386. If the parties cannot agree on the amount of attorney's fees, the parties shall present evidence in the form of affidavits.

24. In order to create a record regarding attorney's fees, the Commission's counsel should file affidavits from plaintiffs' attorneys in Lake County, Ohio regarding the reasonable and customary hourly fees they charge in housing discrimination cases. Also, a detailed accounting of the time spent on this case must be provided and served upon Respondents. Respondents may respond with counter-affidavits and other arguments regarding the amount of attorney's fees in this case.

25. If the Commission adopts the ALJ's Report and the parties cannot agree on the amount of attorney's fees, the Commission should file an Application for Attorney's Fees within 30 days after the ALJ's Report is adopted. Respondents may respond to the Commission's Application within 30 days from their receipt of it.

26. Meanwhile, any objections to this report should be filed pursuant to the Ohio Administrative Code. Any objections to the recommendation of attorney's fees can be filed after the ALJ makes her Supplemental Recommendation Regarding Attorney's Fees to the Commission.

RECOMMENDATIONS

For all of the foregoing reasons, it is recommended in Complaint Nos. 9983 and 9963 that:

1. The Commission order Respondents to cease and desist from all discriminatory practices in violation of Chapter 4112 of the Revised Code;

2. The Commission order Respondents, within ten (10) days of receipt of the Commission's Final Order, to pay Complainant Phillips \$500 and Complainant FHRC \$2,989.48 in actual damages;

3. The Commission order Respondents, within ten (10) days of the receipt of the Commission's Final Order, to pay Complainant Phillips \$1,500 and Complainant FHRC \$500 in punitive damages;

4. The Commission order Respondents, within ten (10) days of receipt of the Commission's Final Order, to make arrangements to attend a training course on fair housing law sponsored by Complainant FHRC, at Respondents' expense, said training course to be taken within six (6) months from the date of the Commission's Final Order; and

5. The Commission order Respondents, as housing providers, to give prospective renters notice of the equal opportunity housing laws in their rental applications with language similar to the language contained in Appendix A.

A handwritten signature in cursive script, reading "Denise M. Johnson", is written over a solid horizontal line.

DENISE M. JOHNSON
CHIEF ADMINISTRATIVE LAW JUDGE

October 10, 2008

EQUAL HOUSING OPPORTUNITY

It is illegal to discriminate against any person because of race, color, religion, sex, familial status (having one or more children), ancestry, disability, or national origin. Anyone who feels he or she has been discriminated against should contact:

Ohio Civil Rights Commission
Lausche State Office Building, Suite 885
615 West Superior Avenue
Cleveland, OH 44113

Toll Free: 888 - 278 - 7101

Phone: 216 - 787 - 3150 Fax: 216 - 787 - 4121

IT IS ALSO ILLEGAL TO RETALIATE AGAINST ANYONE
WHO FILES A CHARGE WITH
THE OHIO CIVIL RIGHTS COMMISSION
OR PARTICIPATES IN A COMMISSION INVESTIGATION.

APPENDIX A