

**DISTRICT OF COLUMBIA
OFFICE OF HUMAN RIGHTS**

-----X
JAMILA GROOMS,)
Complainant,)
)
)
v.) OHR Docket No.: 20-108-FCRSA
)
)
BED BATH & BEYOND,)
Respondent.)
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LETTER OF DETERMINATION
PROBABLE CAUSE FINDING

The District of Columbia Office of Human Rights (OHR) has completed its investigation of the above-referenced complaint. Jamila Grooms, an applicant for employment, is referred to as “COMPLAINANT.” Bed Bath & Beyond, a chain of domestic retail stores, is referred to as “RESPONDENT.”

ISSUE PRESENTED¹

Whether Respondent violated the Fair Criminal Record Screening Amendment Act of 2014 (FCRSA or Act) by making an improper inquiry into Complainant’s criminal history on its application form when, on or around December 19, 2019, Respondent inquired into Complainant’s criminal history on its online Application for Employment (AFE) upon applying for a Cashier position.

SUMMARY OF FINDING

OHR finds **PROBABLE CAUSE** to believe Respondent violated the FCRSA as alleged. The record reasonably indicates that the Work Opportunity Tax Credit (WOTC) Program questionnaire in Respondent’s online AFE made an impermissible, nonexempt inquiry into Complainant’s criminal background prior to a conditional offer of employment.

JURISDICTION

OHR has jurisdiction over alleged violations of the FCRSA filed with OHR within one year of the violation or the discovery thereof. See D.C. Code § 32-1343(a) (the FCRSA incorporates the administrative complaint procedures contained in subchapter III of the D.C. Human Rights Act);

¹ See Complainant’s Charge of Discrimination (Charge), dated February 10, 2020 (OHR File at § II).

id. at § 2-1403.04(a) (pursuant to subchapter III of the D.C. Human Rights Act, complaints must be filed with OHR within one year of the discriminatory conduct, or the discovery thereof). Moreover, jurisdiction is properly before OHR where Respondent employs more than 10 employees in the District of Columbia and where Complainant is an applicant within the meaning of the FCRSA. *See id.* at § 32-1342 (describing the prohibitions applicable to an “employer” and the duties owed to an “applicant” under the statute); § 32-1341(6) (defining an employer as “any person, company, corporation, firm, labor organization, or association, including the District government, but not including the courts, that employs more than 10 employees in the District of Columbia”); § 32-1341(1) (defining the term applicant as “any person considered or who requests to be considered for employment by an employer[,]” in the District of Columbia).²

Here, Complainant alleges that Respondent violated the FCRSA within the District of Columbia on or around December 19, 2019.³ Complainant filed a timely complaint with OHR on the same date.⁴ Respondent is an employer subject to the prohibitions of the statute because it employs more than ten (10) employees in the District of Columbia.⁵ Complainant is also an applicant under the Act because she reportedly applied for a Cashier position with Respondent.⁶ Accordingly, OHR has jurisdiction over Complainant’s complaint.

SUMMARY OF INVESTIGATION

OHR’s investigation included a review of the following: (1) Complainant’s Initial Written Complaint (IWC) and attachment; (2) Complainant’s Charge of Discrimination (Charge); (3) Respondent’s Position Statement, exhibits, and responses to OHR’s Request for Information (RFI); (4) Complainant’s rebuttal and exhibits; and (5) Complainant and Respondent witness interview affidavits.

Complainant’s Allegations⁷

² The FCRSA was enacted to “assist the successful reintegration of previously incarcerated persons into the community by removing barriers to gainful employment, to prohibit the consideration of a job applicant’s arrest during the hiring process, [and] to restrict an employer’s inquiry into a job applicant’s prior convictions until after a conditional offer of employment” 61 D.C. Reg. 8904 (2014), D.C. Act 20-422, Council for the District of Columbia (2014). The Act was enacted in an attempt to “ban the box” on employment applications which make inquiries into a person’s criminal background. *See* D.C. Council, Report on Bill 20-642 at 6-7 (May 28, 2014). It was specifically the intent of the legislature for employers to be prohibited from asking about an applicant’s criminal background until after an application has been submitted. *Id.* at 6-9. Thus, it would contravene the purpose of the FCRSA and the policy considerations that led to the passage of the Act to hold that a person who obtains and begins to fill out an employment application but does not submit the application is excluded from this definition, where the application was not submitted because it contained an unlawful criminal background inquiry.

³ *See* Complainant’s Charge of Discrimination (Charge), dated February 10, 2020 (OHR File at § II).

⁴ *See* Complainant’s Initial Written Complaint (IWC), dated December 19, 2019 (OHR File at § II). The IWC shall constitute the filing date. *See* 4 DCMR § 705.2 (2009).

⁵ *See* Complainant’s Charge, dated February 10, 2020 (OHR File at § II).

⁶ *Id.*

⁷ *See* Complainant’s IWC, dated December 19, 2019, and Complainant’s Charge, dated February 10, 2020 (OHR File at § II).

Complainant alleges the following in her Charge:

On December 19, 2019, Complainant applied online for a Cashier position with Respondent. Respondent's online AFE made a direct inquiry into her criminal history prior to the extension of a conditional job offer. Specifically, Respondent's AFE contained the question "Have you been convicted of a felony in the last year or have you been released from incarceration due to a felony conviction in the last year?" Complainant answered Respondent's inquiry by disclosing her criminal history and later submitted her application for further consideration.

To date, Complainant has not heard from Respondent regarding her AFE. Based on the foregoing, Complainant believes that Respondent discriminated against her based on her criminal history.

Respondent's Position⁸

In response to Complainant's Charge, Respondent asserts the following:

Respondent utilizes a "Careers" website to collect external electronic AFEs. Respondent's AFE does not inquire about applicants' criminal backgrounds. Respondent only requires applicants to respond to an inquiry about past felony convictions and authorizes a criminal background check after the extension of a conditional offer of employment.

In December 2019, Complainant applied online for a Cashier position at Respondent. Respondent's AFE, including the one completed by Complainant, does not inquire about an applicant's criminal background history. However, Respondent participates in the WOTC Program, and the Cashier position for which Complainant applied is one of the positions designated in the WOTC Program. In connection with Respondent's participation in the Program, its third-party vendor (Vendor) invited Complainant to complete a "voluntary" WOTC questionnaire to determine eligibility for participation in the WOTC Program after submitting her AFE. The WOTC Program is designed to encourage the employment of individuals in certain groups, including those with felony convictions. The questionnaire is housed entirely on Vendor's platform, external from Respondent's application system and separate from the AFE.

The questionnaire includes one question regarding the applicant's criminal background based on the Program's requirements. This question is included solely for purposes of Respondent's participation in the WOTC Program. The questionnaire falls under the exception provided under the FCRSA that permits inquiries into criminal history for positions designated by employers as part of a federal program designed to encourage the employment of those with criminal histories.

In accordance with the requirements to participate in the WOTC Program, the questionnaire asks applicants, "Have you ever been convicted of a felony in the last year, or have you been released from incarceration due to a felony conviction in the last year?" Because completing the questionnaire is "voluntary," one of the answers offered for this question and the others on the questionnaire is "I do not wish to answer."

⁸ See Respondent's Position Statement, dated March 17, 2020 (OHR File at § V).

For Respondent to participate in the WOTC Program, and pursuant to the requirements of the Internal Revenue Code (IRC) and IRS Form 8850, it must collect information from applicants to determine eligibility for the Program before extending an offer of employment. Moreover, Respondent does not consider an applicant's answers to the questionnaire as part of its hiring process. Without the questionnaire and a pre-offer inquiry to determine an applicant's eligibility for the WOTC Program, Respondent would otherwise not be able to participate in the Program.

Complainant's Rebuttal⁹

In her reply to Respondent's Position Statement, Complainant contends the following.

Complainant agrees that Respondent's actual AFE did not include any criminal history inquiries. However, to complete the AFE, Complainant had to complete the WOTC Program questionnaire. The questionnaire included a criminal history inquiry that appeared in the "middle" of the AFE.

Complainant recalls one (1) question regarding criminal history on the WOTC Program questionnaire. Complainant had no knowledge of the Program requirements or its requirements. Only Respondent would know that it participates in the Program, which requires Respondent to request information regarding an applicant's criminal history.

Documents

OHR reviewed and considered the following documents provided by Complainant:¹⁰

1. Complainant's IWC and attachment, received December 19, 2019
Screenshots of Respondent's AFE and the Program Questionnaire.
2. Complainant's Rebuttal & Exhibits, dated September 16, 2020
 - a. Screenshot of Complainant's e-signature page for completing the Program Questionnaire's criminal history inquiry;
 - b. Screenshot of Respondent's confirmation of Complainant's participation on the Program Questionnaire; and
 - c. Screenshot of Respondent's Program Questionnaire criminal history inquiry.

OHR reviewed and considered the following documents provided by Respondent:¹¹

Respondent's Position Statement & Exhibits, dated March 17, 2020, and responses to OHR's RFI

- a. Instructions for IRS Form 8850;
- b. Complainant's AFE;
- c. Respondent's blank AFE;
- d. Respondent's Vendor survey;
- e. Respondent's Obtaining Criminal Background Information Policy; and

⁹ See Complainant's Rebuttal, dated September 16, 2020 (OHR File at § IV).

¹⁰ See OHR File at §§ II and IV.

¹¹ See OHR File at § V.

f. The Program Policy.

Summary of Relevant Documents

1. *Respondent's Program Policy* indicates that the Program applies to all applicants for employment in the United States who complete an online application for a position with Respondent. The policy also includes a reminder that Respondent's managers must confirm completion of the Program questionnaire with candidates "prior" to the extension of an employment offer.
2. *Respondent's Program Questionnaire* asks, "Have you ever been convicted of a felony in the last year, or have you been released from incarceration due to a felony conviction in the last year?"
3. The *Instructions for Form 8850* (Rev. March 2016) indicate that the form should be completed and signed by the job applicant on or before the day a job offer is made. The instructions further state that if the employer believes the applicant is a member of a targeted group (as defined under "Members of Targeted Groups"), the employer should complete the form in its entirety no later than the day the job offer is made.

Information from Witnesses¹²

OHR obtained and considered the following statements from (1) Complainant and (2) Respondent's Regional Director of Human Resources (RDHR) via OHR interviews. Each of these individuals testifies as follows.

Complainant¹³

The WOTC Program questionnaire in the AFE inquired into Complainant's criminal history. Completing this questionnaire was a "mandatory" step in the application process. Before completing the questionnaire, the bottom of the screen included a note stating that if it was not completed, it would be "canceled out" and an applicant would have to start a new one. Specifically, the message read, "Once the questionnaire has begun you should not use the [b]rowser's 'back' feature. Doing so will immediately cancel the current questionnaire and a new one will have to be started." Thus, completing the questionnaire was not "voluntary" as Respondent alleges.

After completing the WOTC Program Questionnaire, the AFE produced the following message: "Thank you for taking the tax credit screening, please close this browser window to continue your application." This message informed Complainant that she was required to complete and submit the criminal history inquiry.

¹² See OHR File at § III.

¹³ This section does not contain statements referenced above in Complainant's Charge and Complainant's rebuttal to avoid redundancy.

By asking about Complainant's criminal history in the initial job application, Respondent violated the DC "Ban the Box" law (i.e., the FCRSA). Complainant responded honestly to Respondent's criminal history inquiry. After completing the AFE and Program Questionnaire, Complainant neither heard from Respondent nor followed-up with Respondent.

RDHR

RDHR provides guidance to Respondent regarding associate relations, compensation, performance management, talent acquisition and organizational development. Additionally, RD serves as an internal consultant to Respondent's Field Operations Leadership Teams, leading a team of Human Resources business partners.

Having a criminal history is not an automatic barrier to employment with Respondent. Respondent conducts background checks on candidates after it extends a conditional offer of employment and has been granted authorization to conduct a criminal background check. If a prospective employee has a criminal history, Respondent engages the individual in an interactive dialogue and considers the factors identified under District law to assess the criminal history and make an employment decision.

Respondent presents candidates with the WOTC Program questionnaire at the application stage to determine eligibility for the Program and comply with its requirements. Pursuant to the IRC, the policy under which the WOTC Program is implemented, an individual may not be considered a member of a targeted group for the Program unless the employer (1) obtains certification from a Designated Local Agency that the individual is a member of a targeted group or (2) the employer completes a pre-screening notice for the employee on or before the day that the employer offers the individual employment.

To comply with the requirements of the Program, Respondent must present this information to applicants before extending a conditional offer of employment. Screening prospective employees after they are offered employment would not conform with the requirements of Program and result in a loss of the tax credit for that employee. Respondent takes this approach in accordance with D.C. law, which permits employers to inquire about criminal convictions where a position is designated as part of a federal program that is designed to encourage the employment of individuals with criminal histories. The WOTC Program was designed to serve this purpose.

OHR'S FINDINGS

GENERAL LEGAL STANDARD – PROBABLE CAUSE STANDARD OF REVIEW

Pursuant to D.C. Code § 32-1343(a), a person claiming to be aggrieved by a violation of the FCRSA "may file an administrative complaint with OHR in accordance with the procedures set forth in subchapter III of Unit A of Chapter 14 of Title 2 [§ 2-1403.01 *et seq.*]." Accordingly, following an investigation into a complaint alleging a violation of the FCRSA, OHR is required to determine whether it has jurisdiction over the complaint and if there is probable cause to believe that Respondent has engaged in an unlawful practice. *See* D.C. Code § 2-1403.04-.05.

The D.C. Court of Appeals has determined that OHR’s duty at the probable cause stage is to “consider all the evidence and allegations to determine whether [Complainant’s] claims [are] ‘reasonable’ and make out a *prima facie* case under the Human Rights Act.” *Smith v. D.C. Office of Human Rights*, 77 A.3d 980, 997-98 (D.C. 2013); *see also Sparrow v. D.C. Office of Human Rights*, 74 A.3d 698, 706 (D.C. 2013) (“[T]he probable cause standard . . . requires consideration of whether [Complainant’s] version of events [are] reasonable, not whether he failed to disprove [Respondent’s] version of events.”); *Grove v. Loomis Sayles & Co.*, 85 A.3d 832, 836 (D.C. 2014)(Complainant’s claims must be reasonable and make out a *prima facie* case for a finding of probable cause). If OHR finds probable cause, the case proceeds to a full-fledged administrative adjudication where Complainant has the burden of proving the claims by a preponderance of the evidence. *Grove*, 85 A.3d at 836; *Smith*, 77 A.3d at 997-98.

LEGAL STANDARD – FCRSA COMPLIANCE VIOLATION: CRIMINAL HISTORY INQUIRY ON APPLICATION FORM

The FCRSA prohibits covered employers from making inquiries into an applicant’s arrests or criminal accusations which are not then pending or did not result in a conviction, and from making an inquiry into, or requiring an applicant to disclose, a criminal conviction prior to a conditional offer of employment. D.C. Code § 32-1342(a)-(b).

To establish a *prima facie* claim of non-compliance with the FCRSA, the record must contain evidence that Respondent (1) made an inquiry into Complainant’s criminal background prior to extending a conditional offer of employment and (2) Respondent is not exempt from the prohibitions of the FCRSA. *Id.* at § 32-1342(a)-(c).

Respondent makes an *inquiry* by engaging in “any direct or indirect conduct intended to gather criminal history information from or about an applicant using any method, including application forms, interviews, and criminal history checks.” *Id.* at § 32-1341(8).

An employer may be *exempt* from compliance with the FCRSA where one or more of the following applies: (1) federal or District law or regulations require considering an applicant’s criminal history; (2) when a position is designated by government program or obligation to encourage employment of those with criminal histories; or (3) those who provide programs or services to minors or vulnerable adults. *See* DC Code §32-1342(c) and <https://ohr.dc.gov/page/criminal-background-screening-and-employment-exemptions>.

LEGAL ANALYSIS – FCRSA COMPLIANCE VIOLATION: CRIMINAL HISTORY INQUIRY ON APPLICATION FORM

OHR finds probable cause to believe that Respondent violated the FCRSA by making an improper inquiry into Complainant’s criminal history on its application form when, on or around December 19, 2019, Respondent inquired into Complainant’s criminal history on its online AFE upon applying for a Cashier position.

The record reasonably supports a *prima facie* FCRSA claim. The first element (inquiry into criminal history) is reasonably supported because the record reflects that Respondent inquired into Complainant's criminal history through the WOTC Program questionnaire in the AFE.¹⁴ Specifically, the questionnaire asked Complainant "Have you ever been convicted of a felony in the last year, or have you been released from incarceration due to a felony conviction in the last year?"¹⁵

Respondent is not persuasive when it counters that completing the questionnaire was "voluntary" such that Complainant could have responded, "I do not wish to answer."¹⁶ Complainant disagrees, explaining that to complete the AFE, she could not skip the Program Questionnaire – making it a "mandatory" step in the application process.¹⁷ More importantly, regardless of voluntariness, we emphasize that Respondent's use of the WOTC Program questionnaire link in the AFE constituted an indirect "inquiry" into Complainant's criminal history, within the meaning of D.C. Code § 32-1341(8). A plain reading of the Act shows that the questionnaire was intended to gather information about Complainant's criminal history prior to a conditional offer regardless of whether she was required to respond.

Respondent is also not persuasive when it notes that the WOTC Program questionnaire was housed entirely on the platform of Vendor, a third party, external from Respondent's application system and separate from the AFE.¹⁸ Rather, Respondent's argument is misplaced because the FCRSA prohibits both direct and indirect inquiries. *See* D.C. Code § 32-1341(8) (stating an employer makes an "impermissible 'inquiry' by engaging in 'any direct or indirect conduct intended to gather criminal history information'") (emphasis added). Additionally, under basic agency principles, Respondent is responsible for actions its agents take on its behalf.¹⁹

The record also reasonably supports the second element (not exempt from compliance with FCRSA). To reiterate, an employer is exempt from compliance with the FCRSA where when a position is "designated" by government program or obligation to encourage employment of those with criminal histories. *See* D.C. Code § 32-1342(c) and <https://ohr.dc.gov/page/criminal-background-screening-and-employment-exemptions>.

In reviewing cases involving similar WOTC questionnaires, we note that the IRC does not require employers to inquire about applicants' criminal histories prior to a conditional offer to certify their WOTC Program eligibility under D.C. Code § 32-1342(c)(1) (exemption where federal law

¹⁴ *See* Complainant's Charge, dated February 10, 2020 (OHR File at § II); *see also* Complainant's Rebuttal, dated September 16, 2020, and OHR interview with Complainant (OHR File at § III).

¹⁵ *See* Complainant's Charge, dated February 10, 2020 (OHR File at § II); *see also* Respondent's Position Statement, dated March 17, 2020, and the Program Questionnaire (OHR File at § V).

¹⁶ *See* Respondent's Position Statement, dated March 17, 2020 (OHR File at § V).

¹⁷ *See* Complainant's Rebuttal, dated September 16, 2020, and OHR interview with Complainant (OHR File at § III).

¹⁸ *See* Respondent's Position Statement, dated March 17, 2020 (OHR File at § V).

¹⁹ The District of Columbia's courts recognize, under common-law respondent superior liability, that a principal is liable for its agent's acts when the latter acts within the scope of the agency relationship. *Judah v. Reiner*, 744 A.2d 1047 (D.C. Cir. 2000). Here, Respondent states that it hired Vendor to administer the WOTC Program questionnaire within the AFE. Thus, Vendor's inclusion of the inquiry into applicants' criminal history in the AFE, under Respondent's supervision, created a principal-agent relationship.

requires consideration of an applicant's criminal history for the purposes of employment). Further, the IRC does not require the inquiries at the application stage. Specifically, IRC Section 51(d)(13)(A)(ii)(I) states that "*on* or before the day the individual is offered employment with the employer, a pre-screening notice is completed by the employer..." (emphasis added). **Although Respondent asserts that it must ask the question before an offer is made, the Section provides that the pre-screening notice can also be completed on the day the employment offer is made.** Thus, it was not mandatory to link the WOTC Program questionnaire to the AFE prior to completing the initial application or extending a conditional offer of employment; **and it was possible for Respondent to comply with both the IRC and the FCRSA if the question was asked on the day an employment offer was made.** See 26 U.S.C. §§ 51(d)(1) *et seq.*; D.C. Code § 32-1341(8).²⁰ We recommend that Respondent amend its WOTC Program questionnaire to comply with these laws.

Further, Respondent and RDHR each state that the WOTC Program questionnaire falls under the above-cited exception to compliance with the FCRSA.²¹ For Respondent to participate in the Program, and pursuant to the requirements of the IRC and IRS Form 8850, Respondent explains that it must collect information from applicants to determine eligibility for the program before extending an offer of employment.²² But Respondent provides no credible, persuasive evidence that the Cashier position for which Complainant applied was *specifically* "designated" as one of the positions in the WOTC Program that encourages Respondent to hire applicants with a criminal history pursuant to D.C. Code § 321342(c)(2).

Accordingly, the record supports a reasonable *prima facie* claim of an FCRSA violation, and a hearing is warranted in this matter.

DETERMINATION

For the foregoing reasons, OHR finds:

PROBABLE CAUSE to believe that Respondent violated the FCRSA by making an improper inquiry into Complainant's criminal history on its application form when, on or around December 19, 2019, Respondent inquired into Complainant's criminal history on its online AFE upon applying for a Cashier position and, further,

²⁰ Form 8850, the only standard IRS form required before an applicant's hire date, does *not* contain a direct criminal history inquiry, but rather asks an employee to certify if "any of the following statements apply"; one of the seven statements is "During the past year, I was convicted of a felony or released from prison for a felony," but prior to hiring, the applicant need not specifically indicate which of the seven statements applies. IRS Form 8850; *see also* IRS, Instructions for Form 8850 (Rev. March 2016), available at <https://www.irs.gov/pub/irs-pdf/i8850.pdf>; 26 U.S.C. §§ 51(d)(11), (13)(A). After hire, the employer must specifically report why the employee qualifies for WOTC by submitting ETA Form 9062 within 28 days of hire (after a conditional employment offer). *See* ETA Form 9062 (Rev. November 2016); *see also* 26 U.S.C. § 51(d)(11).

²¹ *See* Respondent's Position Statement, dated March 17, 2020 (OHR File at § V); *see also* OHR interview with RDHR (OHR File at § III).

²² *See* Respondent's Position Statement, dated March 17, 2020 (OHR File at § V).

ORDERS the parties to contact OHR at ohr.mediation@dc.gov consistent with the instructions below to schedule a mandatory conciliation session prior to proceeding to a hearing.

IT IS SO ORDERED.



Hnin Khaing, Interim Director
District of Columbia Office of Human Rights

CONCILIATION

The parties are ordered to contact OHR via email at ohr.mediation@dc.gov, or U.S. post to 441 4th St., NW, Suite 570N, Washington, DC 20001, or by calling 202.727.4559, within fifteen (15) calendar days after receipt of this Determination, to schedule conciliation of the Probable Cause Finding in this matter. If conciliation is unsuccessful, this Office will process this case for a de novo public hearing before the District of Columbia Commission on Human Rights, pursuant to Sections 2-1401 et seq. of the District of Columbia Human Rights Act.²³ Further, the parties are advised that if conciliation is not accomplished within thirty (30) calendar days of receipt of this letter (or if Respondent timely files a request for reconsideration, within thirty (30) calendar days of an order affirming the probable cause finding), the case will be scheduled for a public hearing.

RESPONDENT'S RIGHT TO APPLY FOR RECONSIDERATION

Respondent may submit a Request for Reconsideration on the grounds of newly discovered evidence, misapplication of law, or misstatement of material fact. The request should not exceed ten pages. The request must be based on one or more of these grounds and not a disagreement with OHR's finding. See 4 DCMR §§ 720.1 and 720.2. The application, along with all supporting documentation, must be submitted in writing to the Director of the Office of Human Rights ohr.ogc@dc.gov within 15 calendar days from the following date: 3/8/22. Newly discovered evidence is evidence that: (a) is competent, relevant, and material; (b) was not reasonably discoverable before the issuance of this Letter of Determination; and (c) would alter the ultimate outcome in this case. The application for reconsideration may be dismissed if the application: (a) is not based on one of the above grounds; or (b) is not timely filed. RESPONDENT MUST INCLUDE ALL SUPPORTING DOCUMENTATION AND REASONS IN THE ORIGINAL REQUEST FOR RECONSIDERATION. OHR may forward a copy of any application for reconsideration, along with all supporting documentation, to the other party for a response.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 3/8/22 (date), I
caused OHR's **Letter of Determination and Order** to be served on the following individuals
via e-mail (method of delivery):

Jamila Grooms
c/o Joanna Wasik, Esq.
joanna_wasik@washlaw.org
Complainant

Bed Bath & Beyond
c/o Laurence T. Thompson, Esq.
Laurence.Thompson@jacksonlewis.com
Respondent

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Akita Smith-Evans
Name

Signature