

**COOK COUNTY COMMISSION ON HUMAN RIGHTS**

69 West Washington, Suite 3040  
Chicago, Illinois 60602

---

Joelle WASHINGTON, Complainant	)	Case No. 2005E065A
	)	
v.	)	Entered: September 26, 2013
	)	
COOK COUNTY, <sup>1</sup> Respondent	)	

---

**ORDER**

---

Complainant Joelle Washington (“Washington”) brought this action on November 3, 2005 against her former employer, Respondent Cook County (“Respondent” or the “County”), for unlawful retaliation in violation of Section 42-41(a) of the Cook County Code of Ordinances (“County Code”). At the time of filing, Washington was a CADD Operator I in the Cook County Highway Department (“Department”). Compl., ¶ I. On June 30, 2005, Washington made an internal complaint to Department senior staff that a male coworker used a gendered expletive in a conversation with her and another female coworker. *Id.* at ¶ II(a). Washington alleges that after making this complaint, she was subjected to a series of retaliatory acts by a Department supervisor, Frank Williams (“Williams”). *Id.* at ¶ II(d). Specifically, she alleges that Williams: (1) changed the due date of one of her assignment, *id.* at ¶ II(e); (2) stopped speaking to her, *id.* at ¶ II(f); (3) reassigned her, *id.* at ¶ II(g); (4) called Payroll about her available leave time on one occasion, *id.* at ¶ II(h); (5) requested medical documentation from her after an absence, *id.* at ¶ II(i); (6) denied one of her vacation requests, *id.* at ¶ II(k) and (7) docked a day of her pay, Am. Compl., ¶ II. Having completed its investigation, this Commission dismisses Washington’s complaint, as amended, because the facts found by its investigation do not show substantial evidence of a violation of the Cook County Human Rights Ordinance (the “Human Rights Ordinance”).<sup>2</sup>

**Background**

Washington filed her initial complaint with the Commission on November 3, 2005. At the time of this complaint, Washington was a CADD Operator I for the Cook County Highway Department. Compl., ¶ I. In her complaint, she alleged that on June 30, 2005, she made an internal complaint to Department senior staff. *Id.* at ¶ II(a). Washington told Department senior

---

<sup>1</sup> The named Respondent in this matter, as filed, is the Cook County Highway Department. The Commission has substituted Cook County as the correct responding party.

<sup>2</sup> The Commission previously dismissed this matter for failure to cooperate in March 25, 2008. *Washington v. Cook County Highway Department*, 2005E065A (CCHRC Mar. 25, 2008). The Commission reinstated the complaint on May 12, 2008. *Id.* (CCHRC May 12, 2008).

staff that another Department employee, Jeff Crocker (“Crocker”), called Washington and a female co-worker, “bitches” and persisted in doing so after Washington asked him to stop. In a July 7, 2005 grievance to her union, Washington states that Williams told her that Crocker was probably just playing around. *See also id.* at ¶ II(b), (c). But a December 19, 2005, Bureau of Administration memorandum shows that Cook County investigated Washington’s June 30, 2005 complaint. The same memorandum also documents that Washington testified at a pre-disciplinary hearing on August 18, 2005, and that Crocker was disciplined for the June 30, 2005 incident that same day.

Despite this, Washington alleges that beginning on June 30, 2005, Cook County subjected her to “different terms and conditions of employment than employees who did not complain about sexual harassment,” *id.* at ¶ II(d), including the following:

First, Washington alleges that Williams changed the date of an assignment he had given her. According to Washington, Williams gave her an assignment on August 15, 2005, with a due date of August 18, 2005, and then the next day said that Washington ““better have some work to show me this afternoon concerning [the project] or else!”” *Id.* at ¶ II(e). Cook County denies these allegations. Rp. Verified Resp. at 3. In explaining the claim to the Commission staff, Washington said that Williams confronted her on August 16, 2005, about the previous day’s assignment while she was on a telephone call at work with her husband. She stated that her husband frequently called her at work after the June 30, 2005 incident. Washington also stated that she was able to show some progress on the assignment to Williams that day and that she was never written up or disciplined in connection with the matter.

Second, Washington alleges that Williams stopped speaking to her. According to Washington, except for her, Williams “speaks and talks to every other employee in the department about work or is cordial to them.” Compl., ¶ II(f). Washington claims that Williams started giving her the cold shoulder on August 17, 2005. *Id.* Again, Cook County denies this set of allegations. Rp. Verified Resp. at 3. In an interview with the Commission staff, Washington contradicted the complaint, describing Williams as an introvert who did not speak to anyone and generally kept to himself in his office. Washington also provided conflicting accounts about why Williams stopped speaking to her on August 17, 2005. Initially, Washington told the Commission staff that Williams discovered on August 17, 2005, that she had photocopied his timesheet. Later in the same interview, Washington said that Williams discovered that Washington had participated in Crocker’s pre-disciplinary hearing.<sup>3</sup>

Third, Washington alleges that Williams reassigned her from the engineer with whom she had been working at the time of the June 30, 2005 incident. Compl., ¶ II(g). Cook County denies this allegation. Rp. Verified Resp. at 3. Washington told the Commission staff that Williams assigned CADD operators, such as herself, to work with particular structural engineers and that these structural engineers provided the CADD operators with their daily assignments and

---

<sup>3</sup> A December 19, 2005, Bureau of Administration memorandum shows that Crocker’s pre-disciplinary hearing took place on August 18, 2005. Memorandum of C. G. Hernandez to W. S. Kos re: Joelle Washington – Cook County Highway Department, Cook County Commission on Human rights Complaint #2005E065 (Dec. 19, 2005).

supervision. According to Washington, Williams also liked to have certain structural engineers working in the field instead of the Department office. Since Washington joined the Department in 2003, she said that she had been reassigned twice: once prior to the June 30, 2005 incident in June 2005 and once afterwards on September 13, 2005. She explained that the reassignment outlined in her complaint—the one that occurred several months after the June 30, 2005 incident—took place after Williams assigned Washington’s supervising engineer to work in the field. As a result, Washington went back to working with the engineer who had supervised her when she first joined the Department and one additional structural engineer who had not received a field assignment.

Fourth, Washington alleges that Williams once called Payroll to ask about her available leave time. Compl., ¶ II(h). Washington claims that this occurred during the week of October 3, 2005, and that Williams had never called Payroll about any other employee’s time. *Id.* Cook County denies these allegations. Rp. Verified Resp. at 3. In a follow up interview with the Commission staff, Washington said that the reason that Williams contacted Payroll during the week of October 3, 2005, was because the Department was without a timekeeper and Williams had temporarily assumed that role. Per Washington, the only way that Williams could know how much leave any Department employee had available was to call Payroll. Washington also stated that she did not lose any pay or accrued time due to Williams’ call.

Fifth, Washington alleges that Williams requested medical documentation from her in order to sign in after an absence from work. Washington alleges that on October 14, 2005, Williams told Washington that the “Acting Head of Personnel”<sup>4</sup> had told him that employees needed medical documentation to sign in after an absence. Compl., ¶ II(i). Washington alleges that she called Personnel during her absence to confirm that medical documentation was not necessary under the circumstances. *Id.* Cook County also denies this set of allegations. Rp. Verified Resp. at 3. In explaining the claim to the Commission staff, Washington added that she told Williams that she only needed to provide medical documentation if she had been out for five days not, as was the case here, one- or two-day absences. Williams told Washington to talk directly to the Acting Head of Personnel who confirmed Washington’s understanding of the rule, but said that he told Williams to obtain medical documentation because he thought that Washington had been out for five days. The Acting Head of Personnel cleared Washington to return to duty without requiring medical documentation.

Sixth, Washington alleges that Williams denied her vacation request on October 24, 2005, saying that “Requests for vacation time are to be made prior to the date of anticipated use.” Compl., ¶ II(k). Washington says that employees who had not complained of sexual harassment did not have their vacation requests denied, *id.* at ¶ II(l), and holds up as an example a non-complaining Department employee who had a same day request for half of a sick day and half of a vacation day approved by Williams on September 2, 2005. *Id.* at ¶ II(k). Once again, Cook County denies these allegations. Rp. Verified Resp. at 3. In explaining the claim to the Commission staff, Washington clarified that she made her October 24, 2005 vacation request with

---

<sup>4</sup> The Commission does not believe that this is the correct title of the referenced individual, but uses the title because the parties do and it accurately describes his role.

respect to an absence on October 20, 2005. Further, she claimed that the non-complaining Department employee who had received the same-day vacation request from Williams was politically connected and that Williams let this employee do whatever he wanted because of his supposed clout.

Finally, Washington filed an amended complaint with the Commission on December 20, 2005, that adds a seventh allegation that Williams docked Washington's pay inappropriately on her December 16, 2005 paycheck. Am. Compl., ¶ II(a). The Amended Complaint alleges that Washington asked to take a sick day, but did not have any accrued time to do so. Washington says that Payroll personnel would ordinarily "float" an employee a sick day until he or she has accrued it, *i.e.*, not dock the employee for an absence when the employee had no accrued time, but instead retroactively credit a sick day when it was accrued in the future. *See id.* at ¶ II(c), (e). Naturally, Cook County denies these latter allegations and claims an insufficiency of knowledge as to whether Washington's December 16, 2005 paycheck was less than usual. Rp. Am. Verified Resp. at 1-2. In explaining this new claim to the Commission staff, Washington stated that on five or ten occasions in 2005, she left work and requested that she be docked rather than use any of her accrued time off. This made it difficult for her to determine whether she had done so during the pay period corresponding with the December 16, 2005 paycheck, though she was relatively certain that she had not. Washington was certain that she had been inappropriately docked in 2003, well prior to her June 30, 2005 internal complaint, and that the Department frequently docked the paychecks of a number of employees when, in Washington's estimation, it should not have.

## **Discussion**

The Human Rights Ordinance prohibits retaliation against any person "because that person in good faith has opposed that which he or she reasonably believed to be unlawful discrimination, sexual harassment, or other violation of this Ordinance or has made a complaint, testified, assisted or participated in an investigation, proceeding, or hearing under this Ordinance." County Code, ¶ 42-41(a). In order to prevail on a claim of unlawful retaliation under the Human Rights Ordinance, a complainant must show: (1) that she sought to exercise a right protected by the Ordinance; (2) that she suffered adverse treatment that is reasonably likely to deter the complainant or others from engaging in protected activity and (3) that there is a causal connection between the protected activity and the adverse employment action. *See Pirrone v. Wheeling Industrial Clinic*, 1997E005, \*6 (CCHRC Apr. 12, 2001). The Commission must dismiss a claim in its entirety where there is a lack of substantial evidence to support any element.

### **A. Protected Conduct Under the Human Rights Ordinance**

The Commission's investigation finds substantial evidence that Washington was engaged in protected conduct when she complained to senior Department staff that a male co-worker called her and another female coworker "bitches." The Human Rights Ordinance prohibits unlawful discrimination in the workplace on the basis of sex. *See* County Code, § 42-35(b)(1). To be protected, opposition to a discriminatory practice requires a good faith belief that the practice is unlawful, not an actual showing of unlawful activity. *See Pirrone v. Wheeling Industrial Clinic*, 1997E005, \*6 (CCHRC Apr. 12, 2001). The Commission construes Washington's June 30, 2005

complaint as good faith opposition to what she could have reasonably believed to be unlawful discrimination.

The Human Rights Ordinance does not convert every vulgar, rude or ungentlemanly workplace utterance into an actionable claim for hostile work environment. *See Oncale v. Sundowner Offshore Servs., Inc.*, 523 U.S. 75, 80 (1998) (insults in the workplace do not constitute discrimination “merely because the words used have sexual content or connotations”). It is not lost on the Commission that the epithet at issue is one whose usage is in flux. *See* S. Kleinman, M. B. Ezzell & A. C. Frost, “Reclaiming Critical Analysis: The Social Harms of ‘Bitch’,” 3(1) *Sociological Analysis* (Spring 2009), online at [http://www.jmu.edu/socanth/sociology/wm\\_library/Ezzell.Reclaiming\\_Critical\\_Analysis.pdf](http://www.jmu.edu/socanth/sociology/wm_library/Ezzell.Reclaiming_Critical_Analysis.pdf) (visited Sept. 19, 2013). More men and women, even in (otherwise) polite company, use the term “bitch” to describe each other with seemingly greater frequency and less animus. This pervasive and gender ambiguous usage has de-stigmatized the term for some speakers and audiences in certain contexts. It may also be the cause of careless and unwise—if not intentionally discriminatory—utterances at inappropriate occasions. In light of this, it is possible that Crocker was just “joking around” when he called Washington a bitch—that his behavior was merely unprofessional and, not as Washington believes, illegal.

Nonetheless, Crocker’s subjective intent with respect to the use of such a contentious word in the workplace cannot render Washington’s interpretation objectively unreasonable. For the purpose of evaluating the reasonableness of a complaint for a retaliation claim under the Human Rights Act,<sup>5</sup> the Commission holds that it is reasonable for a woman in a professional setting to assume when her co-worker calls her a “bitch” the word is gendered and derogatory. The Commission’s bright line rule is consistent with the dominant view of courts considering similar matters under federal discrimination laws. *See, e.g., Passananti v. Cook County*, 689 F.3d 655, 666 (7th Cir. 2012) (a jury requires no additional proof that impact of the repeated use of the word “bitch” in the workplace is gender-specific and its impact is to degrade women in the workplace); *Reeves v. C.H. Robinson Worldwide, Inc.*, 594 F.3d 798, 810 (11th Cir. 2010) (*en banc*); *Winsor v. Hinkley Dodge, Inc.*, 79 F.3d 996, 1000-01 (10th Cir. 1996). The Commission’s position is also consistent with Cook County’s reaction to Washington’s June 30, 2005 complaint. Cook County did not take a charitable view of Crocker’s behavior towards his colleagues. Instead, the Commission’s investigation shows that Respondent immediately investigated Washington’s internal complaint and disciplined Crocker after a pre-disciplinary hearing on August 18, 2005. Memorandum of C. G. Hernandez to W. S. Kos re: Joelle Washington – Cook County Highway Department, Cook County Commission on Human Rights Complaint #2005E065 (Dec. 19, 2005).

---

<sup>5</sup> A complainant may need to show more to actually prevail on the merits with a hostile work environment claim. Because Washington’s complaint is for retaliation instead, the Commission has not determined whether Crocker’s actions were sufficiently severe or persistent to be actionable under Section 42-35 of the County Code. In any case, a hostile work environment or sexual harassment claim on the basis of Crocker’s February 2005 actions would have been time-barred by the time that Washington filed her November 2005 complaint with the Commission. County Code, § 42-34(b)(1)(a) (claims must be filed within 180 days of the violation).

## B. Adverse Treatment

The more contested issue is what followed Washington's protected conduct. The parties cannot agree on how Washington was treated after her complaint, let alone whether this treatment was sufficiently adverse to support her retaliation claim. Washington claims that her Department supervisor subjected her to seven adverse employment actions.<sup>6</sup> Compl., ¶ II; Am. Compl., ¶ II. Cook County denies that any of these actions occurred. Rp. Am. Verified Resp.; Rp. Position Stmt. Moreover, in Respondent's Position Statement, Cook County identifies only four of these allegations and argues that of those, only one could be considered adverse, even if any had occurred. See Rp. Position Stmt.

The Commission assumes that Washington properly alleged all seven employment actions. However, Respondent is correct that not all of these actions are materially adverse enough to have dissuaded Complainant or any other reasonable person from making an internal complaint about unlawful discrimination. Specifically, even if Williams (1) changed the due date of an assignment; (2) stopped speaking to Washington; (3) reassigned her; (4) called Payroll to determine how much leave time she had and (5) requested medical documentation when she returned to work from an absence, as alleged, there is a lack of substantial evidence that this treatment in the context of the facts found by the Commission's investigation, is sufficiently adverse to sustain a claim for retaliation under the Human Rights Ordinance.

The anti-retaliation provision of the Human Rights Ordinance seeks to protect unfettered access to the Commission by prohibiting employers from taking any action that would dissuade a reasonable employee from reporting discrimination to the Commission, the courts or even internally at their place of employment. Section 42-41(a) does not immunize a reporting employee "from those petty slights or minor annoyances that often take place at work and that all employees experience." *Burlington N. & Santa Fe Ry. v. White*, 548 U.S. 53, 68 (U.S. 2006). Minor changes in duties or working conditions that do not materially disadvantage an employee, even when unpalatable or unwelcome, do not rise to the level of actionable adverse treatment because the Commission presumes that such changes would not dissuade a reasonable worker from making or supporting a charge of discrimination. See, e.g., *id.* at 68-69; *Recio v. Creighton Univ.*, 521 F.3d 934, 940 (8th Cir. 2008); 2 EEOC 1998 Manual § 8, p 8-13.

Washington's description of a number of the instances of adverse treatment she alleged in her Complaint and Amended Complaint persuade the Commission that much of William's alleged conduct falls into the category of petty slights, minor annoyances and minor changes in duties or working conditions. A reasonable worker would not have been dissuaded from reporting

---

<sup>6</sup> The parties focused on "adverse employment actions" and so the Commission will too, but the parties are reminded that the retaliation protections under the Human Rights Ordinance are broader than the underlying substantive protection to be free from unlawful employment discrimination. While the latter protection requires a complainant to show an adverse *employment* action, the anti-retaliation provision of the Human Rights Ordinance is not so limited. So long as the complainant can show objectively and materially adverse treatment, this treatment need not be strictly limited to actions taken in the workplace, to remain an actionable basis for a claim under Section 42-41(a). Cf. *Burlington N. & Santa Fe Ry. Co. v. White*, 548 U.S. 53 (2006).

unlawful discrimination or sexual harassment even if he or she were exposed to the same treatment as a result. As such, this treatment is outside of the protection of Section 42-41(a) of the Human Rights Ordinance.

Specifically, under the circumstances, changing the due date of one of Washington's assignments was not materially adverse. Washington recounted to Commission staff that two days prior to what she thought was the due date of the assignment, she had been at work on an extended personal phone with her husband. Williams interrupted the call to demand that Washington show him some work on the assignment that afternoon "or else." Washington says she showed Williams the work she had completed on the assignment and received no discipline in connection with the matter. As Washington describes the interaction, Williams did not so much change the due date as he simply required evidence of progress towards its completion. However, even if Washington's initial characterization is correct, a two-day advance in a due date that an employee could meet or fail to meet without discipline is the sort of everyday workplace occurrence that falls outside the ambit of the anti-retaliation provision of the Human Rights Ordinance.

Similarly, under the circumstances, Washington's allegation that Williams stopped speaking to her is also not materially adverse. Washington made conflicting statements to the Commission staff about this allegation, but the strongest version of her statement is that prior to her June 30, 2005 complaint, Williams socialized with Washington and was viewed by her co-workers as being Williams' favorite employee. After her complaint, Williams gave her the cold shoulder. Generally speaking, ignoring a co-worker, particularly socially, does not amount to materially adverse treatment. *See, e.g., Munday v. Waste Mgmt. of N. Am.*, 126 F.3d 239, 243 (4th Cir. 1997) ("In no case in this circuit have we found an adverse employment action to encompass a situation where the employer has instructed employees to ignore and spy on an employee who engaged in protected activity, without evidence that the terms, conditions, or benefits of her employment were adversely affected."). The Commission's investigation shows that Williams' decision not to socialize with a CADD operator, such as Washington, would have no impact on the operator's duties or working conditions. This is because Williams assigned CADD operators to work with particular engineers on particular projects, and those engineers, not Williams, supervised the CADD operators and provided additional work assignments.

Washington allegation that she was reassigned to work with a different engineer is also not materially adverse. Washington told the Commission that when she began working for the Department, she was assigned to work with a male engineer. Shortly before the June 30, 2005 incident, Williams reassigned her to work with another engineer. Several months after the June 30, 2005 incident, this engineer was placed in the field and so Williams reassigned Washington back to her original engineer. Washington raised no allegations that working with her original engineer entailed a change in job duties or responsibilities or otherwise adversely impacted her, and the Commission's investigation did not independently find evidence to support such a conclusion.

Likewise, the allegation that Williams called Payroll about Washington's available leave time is non-adverse. While Washington's complaint suggests that Williams singled her out in questioning her leave time, Compl., § II(h), Washington informed the Commission staff that the

Department did not have a timekeeper on the date of this incident and that Williams had the role on an interim basis. Again, Washington did not allege that she lost any wages or other benefits as a result of Williams actions as the Department's interim timekeeper, and the Commission cannot presume that the sort of scrutiny a Department timekeeper ordinarily applies to leave time usage would dissuade a reasonable employee from reporting harassment and discrimination.

Finally, the allegation that Williams asked Washington to provide medical documentation when she returned to work after a short absence is non-adverse. Washington alleges that on October 14, 2005, Williams told her that per the Acting Head of Personnel, she could not sign in after being absent without medical documentation related to that absence. *See* Compl., ¶ II(i). Washington informed the Commission staff that she contested the issue with Williams who told her to take it up with the Acting Head of Personnel. Washington recounted that the Acting Head of Personnel believed that she had been out for five consecutive days when he provided Williams with the advice that she needed to provide medical documentation. After Washington told the Acting Head of Personnel that she had only been out for a day or two, Washington told the Commission staff that he sent her back to work without requiring medical documentation for the abbreviated absence. Washington then made conflicted statements to the Commission staff about whether she was sent home by the Department after being cleared to return to work by the Acting Head of Personnel on October 14, 2005. She initially stated that was not and then later told the Commission staff that she was. Washington provided the Commission with a written grievance she submitted to her union on or about October 27, 2005, regarding Williams' actions on October 14, 2005. There is no mention of Williams sending her home on October 14, 2005, or docking her pay for that day, despite being cleared for work by the Acting Head of Personnel. As such, the Commission is without substantial evidence to conclude that this alleged misunderstanding between Washington, Williams and the Acting Head of Personnel, rises to the level of actionable adverse treatment for the purpose of supporting a retaliation claim.

### **C. Causal Connection**

The Commission assumes without deciding that Washington's two remaining allegations—that Williams denied her vacation request, *id.* at ¶ II(k), and that he docked a day of her pay, Am. Compl., ¶ II—would dissuade a reasonable employee from reporting discriminatory activity. There is, nonetheless, a lack of substantial evidence to support a violation of the anti-retaliation provision of the Human Rights Ordinance because the Commission's investigation shows no causal connection between this alleged treatment and Washington's June 30, 2005 internal complaint.

To be actionable, the complainant must be the subject of adverse treatment *because* he or she engaged in protected activity under the Human Rights Ordinance. Here, Washington complained that Williams denied a vacation request on October 24, 2005, stating that “Requests for vacation time are to be made prior to the date of anticipated use.” Compl., ¶ II(k). Washington explained to the Commission staff that she made a retroactive vacation request on October 24, 2005, that half of the day she had taken off as sick on October 20, 2005, be treated as vacation time instead. Washington argues that Williams' denial of this retroactive vacation request was attributable to her June 30, 2005 complaint because, as alleged in her complaint, Williams approved a same-day half-sick/half-vacation day request for another Department

employee on September 2, 2005. *Id.* at ¶ II(k), (l). Even if the Commission ignores the difference between a same-day request for vacation time and a retroactive request, Washington has presented no evidence to support the claimed causal link between her denial and her protected activity. In explaining this allegation to the Commission staff, Washington stated that Williams routinely granted the requests of the Department employee who made the September 2, 2005 request because this employee had political clout that he could call in against Williams. If this is so, then Williams is treating the non-complaining employee cited by Washington better, not because this employee never made an internal complaint about discrimination or sexual harassment, but for some reason wholly unrelated to that employee's or Washington's protected activities under the Human Rights Ordinance.

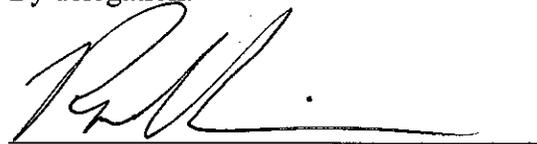
The same can be said of Williams' allegation in her Amended Complaint that she was docked pay on her December 16, 2005, after she requested a sick day she did not have and Payroll refused to "float" her a sick day until she accrued it. Am. Compl., ¶ II(a), (c), (e). Washington explained to the Commission staff that Cook County docked her pay inappropriately prior to her June 30, 2005 complaint, and that a lot of other Department employees had their pay docked when, in Washington's estimation, they should not have. Again, if this occurred (Cook County denies the allegation), it would be indicative of a dysfunctional work environment, but not one specifically where whistleblowers are subjected to uniquely adverse treatment because of their whistleblower activity. The Commission on Human Rights can address the latter. The former is also of great concern, if it occurred. But it is outside the scope of the Commission's charge under the Human Rights Ordinance and more appropriately (and systematically) addressed by human resources personnel, like other non-discrimination based workplace challenges.

### Conclusion

For the foregoing reasons, the Commission orders that complaint 2005E065A be DISMISSED for LACK OF SUBSTANTIAL EVIDENCE of a violation of the Human Rights Ordinance. In accordance with CCHR Pro. R. 480.100(B), either party may file a request for reconsideration with the Commission within 30 days of receipt of this order.

September 26, 2013

By delegation:



Ranjit Hakim  
Executive Director of the Cook Commission on  
Human Rights