COOK COUNTY COMMISSION ON HUMAN RIGHTS
69 West Washington Street, Suite 3040
Chicago, Illinois 60602

Gerald BELL, Complainant	)	Case No. 2014E010
v.	)	Entered: April 20, 2015
PARKVILLE AUTO BODY, INC., Respondent	)	

ORDER

On June 4, 2014, Complainant Gerald Bell ("Bell") filed a complaint against his former employer, Respondent Parkville Auto Body, Inc. ("Parkville" or "Respondent"). Bell is African American and alleges that Parkville's owner subjected him to demeaning treatment and then terminated him because of his race in violation of the Cook County Human Rights Ordinance ("Human Rights Ordinance"). *See* Cook County Code of Ordinances ("County Code"), § 42-35(b)(1).

The Cook County Commission on Human Rights ("Commission") has investigated Bell's complaint, and now dismisses for lack of substantial evidence of a violation of the Human Rights Ordinance. There is insufficient evidence to establish a *prima facie* case of unlawful race discrimination.

BACKGROUND

Gerald Bell worked at Parkville, an automobile body repair shop, from August 2013 to December 6, 2013. Compl., ¶ I. He was hired and supervised by Nicholas DePaul ("DePaul"), Parkville's sole owner and on-site manager. Resp. Pos. St., p. 1. Bell was employed as a detailer. His job duties included washing, vacuuming and buffing cars; picking up and delivering cars; and some general maintenance. N. DePaul Interview (Sept. 10, 2014). The more senior detailer, Jason Rossi ("Rossi"), was primarily engaged in buffing, while Bell worked on buffing only a few hours per week. *Id.* Bell had the least seniority at Parkville. G. Bell Interview (Aug. 7, 2014). He also was the only African-American employee during his several months working at Parkville.[1] Compl., ¶ II(C).

According to Bell, starting on or about September 30, 2013, DePaul began speaking to Bell in a disrespectful manner, such as telling Bell to "Go clean them fucking cars!" in front of

[1] DePaul asserted that Parkville has had other African-American employees prior to Bell, including one man with whom DePaul was supposedly very close some ten years ago. N. DePaul Interview (Sept. 10, 2014).

other Parkville employees. Compl., ¶ III(D). Bell also claims that DePaul treated him dismissively when he asked work-related questions. *Id.* at ¶ III(E). Bell alleges that once DePaul accused him of buffing a vehicle improperly and then, after learning it was the poor work of another employee (logically, a non-African-American), DePaul neither apologized to Bell nor reprimanded that employee. G. Bell Interview (Aug. 7, 2014); Compl., ¶ III(I).

DePaul, for his part, denies ever making disrepectful statements to Bell, and asserted that he does not speak that way to any of his employees or use profanity at work. N. DePaul Interview (Sept. 10, 2014). None of Bell's former co-workers agreed with Bell's description of DePaul's behavior, including two witnesses that Bell specifically represented to the Commission would corroborate his version of the events. Rossi – the other detailer at Parkville – told the Commission that he has never heard DePaul curse or talk down to any employees at Parkville, including Bell. J. Rossi Interview (Feb. 4, 2015). Rossi also said that Bell never complained to him about being treated badly by anyone at work. *Id.* Rossi claimed that Bell often had a "bad attitude" at work, citing in support an alleged incident where Bell refused to help him buff when two cars needed immediate attention after it rained. *Id*. As background, however, DePaul noted in his interview with the Commission that there was a personality conflict between Rossi and Bell. N. DePaul Interview (Sept. 10, 2014).

Bell claimed that Parkville body technician Ted Janus ("Janus") had witnessed incidences of DePaul's alleged abusive behavior towards Bell. G. Bell Interview (Aug. 1, 2014). But Janus refutes this claim. T. Janus Interview (Jan. 26, 2015). Like Rossi, Janus said that he had never heard DePaul speak to Bell or any other Parkville employee in a demeaning manner, and that DePaul does not use profanity when speaking to staff. T. Janus Interview (Jan. 26, 2015).

Bell identified a third former co-worker, Angel Vera ("Vera"), as another person who could support his claim of mistreatment. G. Bell Interview (Aug. 7, 2014). At the time of his interview with Commission investigators, Vera no longer worked at Parkville; he left in January 2014 for another job. Even so, Vera did not offer any evidence confirming Bell's allegations of DePaul's rudeness. Vera stated that he never heard DePaul curse at or speak disrespectfully to any of the Parkville employees, including Bell, nor did he ever hear DePaul make disparaging remarks about Bell or any other member of the staff. A. Vera Interview (Apr. 8, 2015). Vera never heard DePaul say "Go clean them fucking cars!" to Bell, nor does he recall witnessing DePaul ever reprimand Bell. *Id.* In addition, Vera said he does not recall Bell ever complaining to him that DePaul treated him (Bell) in a demeaning or discriminatory way. *Id.* Vera also explained that because he was an automobile body technician at Parkville, he worked in the rear auto repair building – not near Bell, who worked in the front building or outside in the space between the two buildings. *Id.*

In addition to the uncorroborated harsh communication, Bell also alleges that DePaul falsely and discriminatorily accused Bell of stealing. Compl., ¶ III ((F). As Bell describes the incident, on October 3, 2013, DePaul told Bell that a Parkville buffer was missing, and asked for Bell's consent to search his car for the missing buffer. *Id*. Bell allowed the search. The Parkville buffer was not found in his vehicle, and Bell believed it was later found on the premises. Bell claims that he told DePaul that he felt discriminated against because no one else was questioned about the buffer, and that DePaul then accused Bell of "playing the 'race card.'"

Id. at ¶ III((F)(iv)). Vera remembers that Bell was upset about this incident, but does not recall Bell saying anything about any racial aspect to it. A. Vera Interview (Apr. 8, 2015).

By way of background, Bell did not make use of Parkville's buffers during his tenure with the company. Instead, with DePaul's permission, Bell brought in his own personal buffer to use when buffing cars at work. Bell regularly carried this buffer back and forth from work in a Parkville buffer bag that bore the name of the company. Resp. Pos. St., p. 2; G. Bell Interview (Aug. 1, 2014). Thus as DePaul explains the incident, Bell was not being accused of switching the buffers intentionally, but was asked because there could have been an inadvertent mix-up. Resp. Pos. St., p. 2; N. DePaul Interview (Sept. 10, 2014). Bell was the only employee questioned about the missing buffer because he was the only employee who regularly took home a buffer he used at work. *Id.* DePaul's inquiry was triggered when another employee noticed that a buffer on a work shelf was not a Parkville buffer, and that one of the Parkville buffers was missing. Resp. Pos. St., p. 2. As soon as DePaul examined Bell's buffer and confirmed that its serial number did not match the record of Parkville's missing buffer, the matter was concluded. *Id.*

Another of Bell's claims involves a false accusation that never occurred. Bell alleges that on or about November 4, 2013, Janus told him that management was going to say that something was missing from a customer's vehicle, and then hold Bell responsible in order to have a reason to fire him. Compl., ¶ III(G); G. Bell Interview (Aug. 1, 2014). Janus denied ever telling Bell this or anything similar. T. Janus Interview (Feb. 6, 2015). As Bell admits, Janus's alleged prediction never came to pass. No one at Parkville ever accused Bell of stealing items from anyone's vehicle. G. Bell Interview (Aug. 1, 2014).

Bell also alleges that at some point in mid-November, DePaul told him that "things were slow" and that he should not report to work that week. Compl., ¶ III(H). Bell notes that all of the other Parkville employees were allowed to come in and work that week. *Id*. Janus recalled that work was slow that November. T. Janus Interview (Jan. 26, 2015). According to DePaul, Bell's hours were cut because he had the least seniority and other more senior employees, who typically worked overtime, also had a reduced schedule that week because business was slow. Resp. Pos. St., p. 2.

On December 6, 2013, Bell was fired after a heated argument with DePaul. According to Bell's version of events, it started when DePaul told him to "clean them fucking cars." When Bell asked DePaul not to speak to him that way, DePaul allegedly replied that he (DePaul) would speak to Bell "any fucking way I feel like it." Compl., ¶ III(J). DePaul then supposedly bumped Bell with his body and said "take the first swing." Bell refused, and DePaul said "you're fired, get off my fucking property." Bell left. *Id.* Bell asserts that no one else heard this fight, which took place in an outdoor area between the office and the workshop. G. Bell Interview (Aug. 1, 2014).

Respondent's account of this incident is markedly different. In Parkville's version of the events, DePaul asked Bell to buff a car and pointed out the areas needing attention. Resp. Pos. St., p. 3. Bell supposedly responded by questioning why he was being asked to do "this stuff." *Id*. DePaul replied that he was asking Bell to do it because it was Bell's job, and Bell responded that he was asking Bell to do it because Bell is black. *Id.* Bell then allegedly approached DePaul

and said, "hit me Nick and I'll knock you the fuck out, you fuckin whitie." Parkville claims that Bell uttered more racial slurs at DePaul, who then told Bell to pack his things and leave. *Id.* Parkville asserts that DePaul fired Bell on the spot because of this violent and outrageous behavior, and that no one else has ever threatened to physically harm the owner and retained his job. *Id.* at pp. 3, 5.

A witness who neither works for Parkville nor is a party to this case saw the December 6, 2013 altercation and corroborated every detail of DePaul's description. Brett Martin ("Martin"), an electrical contractor, happened to be at Parkville installing internet cables on that day, and he was working in the immediate vicinity during the fight. B. Martin Interview (Oct. 17, 2014); Investigation Report, Ex. D (B. Martin Statement).[2] As Martin described it, the incident began after DePaul pulled up in the area between the Parkville buildings driving a customer's silver BMW, and pointed out to Bell the areas of the car that he wanted Bell to buff. Martin recalled the back and forth just as DePaul described it.[3] *Id.*

In addition, Rossi (Bell's fellow detailer during his time at Parkville) said that he was working about 10 feet away from DePaul and Bell at the time of the fight. Rossi claims that he heard DePaul tell Bell to "work on this car," missed the rest, and then heard Bell say loudly: "I'm gonna sue you and take you to court" and "Stupid, you gave me just what I wanted." J. Rossi Interview (Feb. 4, 2015); Investigation Report, Ex. E (J. Rossi Statement). No one else reported hearing these statements.

DISCUSSION

The Human Rights Ordinance prohibits any employer from "directly or indirectly discriminat[ing] against any individual in hiring, classification, grading, recruitment, discharge, discipline, compensation, selection for training and apprenticeship, or other term, privilege, or condition of employment on the basis of unlawful discrimination." County Code, § 42-35(b)(1). Unlawful discrimination is defined to include "discrimination against a person because of the actual or perceived status, practice, or expression of that person's race." *Id.* at § 42-31.

The Standard

At this stage of the proceedings, the Commission's task is to determine whether the investigation into Bell's complaint shows substantial evidence of an Ordinance violation. In evaluating claims, the Commission uses a hybrid test: a modified version of the familiar three-step *McDonnell Douglas* approach, expanded to include the more flexible range of evidence used in the newer "mosaic" test. *Marino v. Chicago Horticultural Society*, 2012E029 (CCHRC Mar.

[2] Martin was hired by Parkville to do the installation work. He did contract work at Parkville, for the first and only time, on December 5 and 6, 2013 and part of either December 9 or 10, 2013. B. Martin Interview (Oct. 17, 2014).

[3] Martin asserts that after DePaul's request to buff, Bell then said, "Why do you have me doing this stuff?" and DePaul responded, "Because I asked you too." Then Bell said, "You're making me do this because I am Black," and Nick responded, "No I'm asking you because it's your job." B. Martin Interview (Oct. 17, 2014); Investigation Report, Ex. D (B. Martin Statement). The Commission obtained documentary evidence of Martin's presence on the scene that day (*i.e.* Home Depot receipts) and additional evidence to support his recollections (*e.g.*, Parkville invoice for a silver BMW). Investigation Report, Exs. B, C.

20, 2015) (describing the alternative tests used by courts and agencies and the benefits of combining them into a single hybrid test).

Under the Commission's approach, except in the rare case of a direct admission, a complainant must first establish a *prima facie* case of unlawful discrimination by identifying substantial evidence to show that:

(1) he is a member of a protected class;

(2) he performed his job satisfactorily;

(3) he suffered an adverse employment action; and

(4) some strongly probative evidence raises the inference that respondent had a discriminatory motive for taking that adverse employment action.

Id. The first three elements adhere to the well-established *McDonnell Douglas* formula. The fourth element reflects the mosaic test's focus on the spirit of the inquiry. The inference of discrimination may be raised by the traditional method of showing that similarly situated employees outside of complainant's protected class were treated more favorably. Or this element may be satisfied by some other kind of evidence suggesting discriminatory intent. Examples include suspicious timing, ambiguous statements, or generally unfavorable treatment of other employees in the protected group. *Id.*

If the complainant provides substantial evidence of this *prima facie* case, then the burden shifts to the respondent to articulate a legitimate, non-discriminatory reason for the adverse employment action. If it does so, then the burden shifts back to the complainant to present substantial evidence that respondent's asserted non-discriminatory reason is a pretext for discrimination.

The ultimate burden of showing substantial evidence of an Ordinance violation remains with the complainant. Accordingly, the Commission also will find a lack of substantial evidence if there is conclusive evidence rebutting one or more elements of the *prima facie* case (*e.g.*, the evidence shows that there was no "adverse employment action" despite complainant's allegation to the contrary).

Substantial Evidence to Support the First Three Elements of Bell's *Prima Facie* Case

Bell alleges race discrimination and, as an African-American, plainly meets the first element of membership in a protected class. He meets the second element as well. Bell asserts that he performed his job at Parkville "in a satisfactory manner at all times." Compl., ¶ III(B). On October 16, 2013, he failed to report for work and did not notify anyone at Parkville that he would be absent. An "Employee Warning Notice" was issued to Bell regarding this incident. Investigation Report, Ex. A. But evidence of a single warning does not defeat satisfaction of this element.

While Bell's discharge easily satisfies the third element, adverse employment action, his additional claim requires more analysis. The complaint also alleges that Parkville violated the

Human Rights Ordinance when Bell was "subjected to demeaning treatment" because of his race. Compl., ¶ II. But the rude treatment alleged here, standing alone, does not qualify as an "adverse employment action."

"An adverse employment action constitutes *a significant change in employment status*, such as hiring, firing, failing to promote, reassignment with significantly different responsibilities, or a decision causing a significant change in benefits." *Cambron v. Kelvyn Press Inc*., 2011E021, *4 (CCHRC July 28, 2014) (emphasis added). Discrimination claims based on a supervisor's rude, disrespectful treatment are routinely dismissed for not meeting the "adverse action" requirement. *See, e.g.*, *Griffin v. Potter*, 356 F.3d 824, 830 (7th Cir. 2004) (boss made critical comments about plaintiff over a 2-month period at staff meetings, including that she was a "bad influence on the office"); *Speer v. Rand McNally & Co.*, 123 F.3d 658, 664 (7th Cir.1997) (boss "yelled at [plaintiff] and did not make her feel as if she was part of the work group"); *Luckett v. Menasha Material Handling Corp*., 2005 U.S. Dist. LEXIS 22064, *20-21 (N.D. Ill. Sept. 29, 2005) (supervisor questioned and scolded plaintiff about petty matters and insulted him in front of coworkers). Indeed, demeaning and rude treatment violates employment discrimination laws only if the respondent's conduct is sufficiently severe and pervasive to rise to the level of actionable racial harassment. *Hilt-Dyson v. City of Chicago*, 282 F.3d 456, 465-66 (7th Cir. 2002). Bell's litany of everyday workplace woes – devoid of even a single racial epithet – clearly does not.

Even where alleged conduct does not itself constitute an adverse employment action, however, it may be relevant as evidence of discrimination in connection with other employment actions that do meet the third element, like being fired. *Oest v. Illinois Dep't of Corrections*, 240 F.3d 605, 613 (7th Cir. 2001). And so the alleged harsh words and false charges will be analyzed next under the fourth element.

Lack of Substantial Evidence to Support the Fourth Element of Bell's *Prima Facie* Case

Focusing first on the December 6, 2013 altercation that culminated in Bell's discharge, there is no evidence suggesting a racial motivation for the firing. Oddly, while it is Bell who claims race discrimination, Bell's rendition of the fight lacks any reference to race.[4] Bell's own description of the exchange suggests that he was fired for not dealing well with an unpleasant boss (*i.e.* what a boss is likely to view as insubordination). There is no evidence (nor did Bell assert) that other Parkville employees clashed with DePaul over his work-related commands or questioned his manner of giving orders, but were not fired.

Thus, whether there is substantial evidence to raise the inference that Bell was fired because of his race depends on what can reasonably be extrapolated from his allegations of

[4] The only version of the fight between DePaul and Bell that has an explicit racial references is DePaul's in which he claims that Bell called him "whitie." As described above, a disinterested, chance witness to the events corroborated DePaul's description – not Bell's. But the Commission need not (and should not) choose sides on the specifics of their heated exchange at this stage of its process.

demeaning treatment in the months leading up to this clash. The charges break down into rude discourse and false accusations.[5]

Starting with Bell's strongest evidence, he expressly alleged race discrimination in one of his examples: the search of his car for the missing Parkville buffer. Bell claims he told DePaul at the time that he felt discriminated against because he was the only employee questioned. It may be telling that his co-worker at the time, Vera, recalls Bell complaining to him about the incident shortly afterward, but *not* suggesting to him that race played into it. For purposes of this analysis, however, the Commission accepts Bell's recollection as true.

In the absence of mitigating circumstances, where a complainant is respondent's only African-American employee, respondent's incorrect accusation of theft could be sufficient to raise the inference of race-based discrimination in satisfaction of the fourth element of the Commission's *prima facie* test for unlawful discrimination. Given the cultural context, if the manner of the accusation was particularly humiliating, it might even rise to the level of racial harassment. *See*, *e.g.*, Kelly Welsh, "Black Criminal Stereotypes and Racial Profiling," *J. Contemporary Criminal Justice* 23(3): 276 (Aug. 2007), online at http://www.sagepub.com/gabbidonstudy/articles/Welch.pdf (last visited Apr. 8, 2015) (describing social backdrop). *Compare Stockett v. Muncie Ind. Transit Sys.*, 221 F.3d 997, 1002 (7th Cir. 2000) (where drug test is not performed in a routine fashion as part of employer's regular, legitimate practice, and is conducted in an intrusive manner that harasses and humiliates and done without a reasonable, particularized grounds for suspicion, it may constitute "adverse employment action" under Title VII).

The incident at Parkville, however, is not freighted with such meaning. While Bell was the only employee asked if he had the missing buffer, the reasonable explanation, based on particular circumstances, is unrelated to any racial stereotypes about who steals. Instead Bell was the only employee who regularly carried a buffer to and from work, and he carried it in a Parkville bag. Under those singular conditions, DePaul's explanation that he asked to see Bell's buffer to check whether the two buffers had been inadvertently switched is inherently believable. It is also an explanation that is unrelated to Bell's race and cannot form the basis of reasonable inference of racial discrimination.[6]

Next, the claim – that DePaul regularly spoke to Bell in a disrespectful manner (including by swearing and responding dismissively to Bell's work-related questions) – also fails to meet the fourth element. There is not substantial evidence that this even occurred. Nor do his own allegations suggest that DePaul's rudeness to him had anything to do with Bell's race.

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[5] While Bell also complained that he was the only one told to take one (unpaid) week off when business was slow, that point does not even come close to raising an inference of racial discrimination, given that Bell was the most recently hired, and seniority is a commonly-used neutral basis for such management decisions.

[6] The remaining two allegations of false accusations are too trivial to be relevant here. For a boss to once accuse an employee of poor work and then not apologize upon learning it was someone else's fault is an ordinary annoyance of nearly every workplace. And a purported plan to falsely accuse Bell of stealing which never occurred does not so much form a legal basis for a complaint as it is an example of baseless office gossip.

Bell's allegations are lacking. Bell alleges that DePaul's rude treatment began on September 30, 2013, but strangely does not explain why DePaul would have waited a month after Bell's August hiring to begin the discriminatory treatment. More importantly, Bell does not actually allege that DePaul spoke to other employees more respectfully. And no evidence, including the witnesses that Bell himself pointed the Commission to, supports Bell's claim that DePaul used abusive language with Parkville employees, racial or otherwise.

DePaul, of course, denies engaging in the offensive behavior. The Commission might also discount the testimony of the two current Parkville employees interviewed (who both said they had never heard DePaul speak disrespectfully or swear at anyone at work, including Bell) who may be motivated to support their employer. But the Commission cannot ignore a witness like Vera, who is no longer beholden to Parkville and who Bell said would corroborate his story. Instead, this witness without any ostensible reason to sugarcoat DePaul's conduct, corroborated DePaul's testimony. Likewise, the one witness with no current or past connection to Parkville or DePaul, Brett Martin, also said that DePaul did not swear at Bell and portrays Bell as the aggressor in the December 6, 2013 fight.

It is not the Commission's role to weigh the credibility of witnesses' statements at the investigation stage of its process. But the Commission also will not hold a hearing on a complainant's allegations where there is so little evidence for the complainant's claim that no reasonable hearing officer could find in his favor. At the end of the Commission's investigation, with every witness, including those who Bell would call at a hearing, lined up against him, all Bell has to prove his case is his bald and unsubstantiated allegations to the contrary. Under these circumstances, particularly as buttressed by the "same-actor" inference, discussed below, there is not enough evidence to support Bell's claim and this case should proceed no further.

Same Actor Inference

The same-actor inference increases the hurdle that Bell faces in raising the inference that DePaul was motivated by racial animus. Under the same-actor theory, where the same person does the hiring and firing of an individual, the legal inference is that the firing did not result from an improper discriminatory motive. *Harris v. Warrick County Sheriff's Dep't*, 666 F.3d 444, 449 (7th Cir. 2012); *Batavia Park Dist. v. Ill. Human Rights Comm'n*, 2012 IL App (2d) 120098-U, P99-P101, 2013 Ill. App. Unpub. LEXIS 542, 67-70 (2013).

> The theory is based on a common-sense psychological assumption, that "it hardly makes sense to hire workers from a group one dislikes (thereby incurring the psychological costs of associating with them), only to fire them once they are on the job."

Johnson v. Zema Sys. Corp., 170 F.3d 734, 744-45 (7th Cir. 1999) (citations omitted).

The same-actor inference has "'strong presumptive value.'" *Marshall v. Winpak Heat Seal Corp*., 2010 U.S. Dist. LEXIS 34929, *11 (C.D. Ill. Apr. 8, 2010) (quoting *EEOC v. Our Lady of Resurrection Medical Center*, 77 F.3d 145, 152 (7th Cir. 1996)). Sometimes described as a rebuttable presumption, *Augsburger v. Firstar Bank Milwaukee, N.A.*, 2004 U.S. Dist. LEXIS 2787, *6-8 (N.D. Ill. Feb. 20, 2004) (reviewing cases), at a minimum, it is "one more

thing stacked against" a complainant, *Martino v. MCI Commc'ns Servs., Inc*., 574 F.3d 447, 455 (7th Cir. 2009).

The value and weight of this inference depends on the specific facts of a case. The shorter the interval between hiring and firing is the stronger its evidentiary value. *See Augsburger*, 2004 U.S. Dist. LEXIS 2787 at * 6-7 (citing *Chiaramonte v. Fashion Bed Group, Inc.*, 129 F.3d 391, 399 (7th Cir. 1997)) (inference requires a "relatively short time span," applied where 2-year interval between hiring and firing). Also relevant is the type of discrimination alleged. An employee's age, for example, obviously increases over time, and so a boss's likelihood of discriminating on the basis of age may increase as well. *See Filar v. Bd. of Educ*., 526 F.3d 1054, 1065 (7th Cir. 2008) (inference did not apply in age discrimination case with 7-year timespan because it is consistent with ageism for an employer to assume an employee is productive at 62 but not at 69). With some protected categories, such as sexual identity and religion, an employer may not be aware that the employee is a member of protected class until after hiring (or that awareness may be in dispute), so the inference would not apply. Also, the "psychological assumption underlying the same-actor inference may not hold true on the facts of the particular case"; for example, a manager may be comfortable hiring a minority or female employee, but resent that employee based on race or gender if he or she is promoted. *Johnson*, 179 F.3d at 745.

Here, the same-actor theory gives rise to a strong presumption that DePaul did not fire Bell based on his race. DePaul is the owner and the on-site manager of a small auto body shop, with the sole discretion to hire and fire his employees. There is no doubt that DePaul was aware Bell was African-American at time that DePaul hired him in August. DePaul fired Bell a few short months later, and the Commission did not adduce evidence during the course of its investigation that DePaul became a racist in those intervening weeks. Further, there is no evidence suggesting any reason that the same-actor theory should not apply.

Putting together the same-actor inference and the lack of any evidence supporting Bell's claims (beyond his own bare allegations), Bell has failed to establish a *prima facie* case of race discrimination.

CONCLUSION

For the foregoing reasons, the Commission orders that Complaint No. 2014E010 pending before this Commission be DISMISSED for LACK OF SUBSTANTIAL EVIDENCE of a violation of the Human Rights Ordinance. In accordance with CCHR Pro. R. 480.100(A), either party may file a request for reconsideration with the Commission within 30 days of the date of this order

April 20, 2015

By delegation:

Ranjit Hakim
Executive Director of the Cook County
Commission on Human Rights