

# VIRES LAW GROUP

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**Date: March 15, 2023** 

# Filing with local EEOC and State FEPA Offices on Covid-19 Vaccination Status Discrimination

This memo is designed to assist you in filing your claims of unlawful conduct against your employer, using federal law claims under Title VII of the Civil Rights Act of 1964, as amended, and the Americans with Disabilities Act ("ADA"), as amended, as the guide. Please note that if your state also has civil rights laws regarding religious protection and protection against discrimination and retaliation for disability in the workplace, you should add these claims when you file. If your state has a Fair Employment Practice Agency ("FEPA") and agreement with the federal Equal Employment Opportunity Commission ("EEOC"), your claims will be dual-filed by the EEOC with the state office (and vice versa). For a listing of FEPAs to determine whether your state has dual-filing see **Appendix A** hereto. You can also contact your state's FEPA to ask about your state's workplace protection laws.

We recommend filing with the EEOC and allowing it to make the dual filing notice with the FEPA in your state based on of our experience with EEOC claims filed concerning Covid-19 discrimination issues. Thus far, both local-level investigators and higher level authorities in the EEOC have been largely consistent in agreeing that claimants alleging religious and other discrimination and retaliation by their employer based on their unvaccinated status have valid claims to pursue. However, in contrast, we have evidence of at least three major state FEPAs that are not only denying all claims related to Covid-19 as having no "reasonable cause" or basis in law to proceed, but even going so far as colluding with employers to deny employee claims.

Note that you have a time limit in which you need to make your claims before the EEOC. We do not think many of you will have any concerns with the deadlines because discrimination and harassment in many cases is ongoing. However, you should be aware that if there are specific instances of adverse action against you, each instance has its own 180-300 day deadline, eg: if you were first demoted, then terminated – the deadline to file your claims based on the demotion differ in time from the deadline for filing based on the termination. If your state does not have a FEPA, generally, you need to file a "charge" at the EEOC within 180 calendar days from the day the discrimination took place. If your state does have a FEPA, you are allowed 300 calendar days to file with the EEOC.



# **Outline of Claims:**

# A. Religious Discrimination

There are several "protected classes" under Title VII. However, note that your medical status as *unvaccinated* is not a protected class in the context of Covid-19 vaccination mandates and "protocols" for unvaccinated employees. Rather, we focus here on claims under Title VII related to discrimination against you for your sincerely held religious beliefs which led you to decide not to receive a Covid-19 vaccination.

You may have a claim under Title VII if you refused Covid-19 vaccination and made your employer aware of this fact because of a sincerely held religious belief against taking the shots. The most obvious evidence of this would be if you filed a request for a religious exemption to taking the shot.

Your employer is required to do an individualized assessment of your application for exemption, and approve your exemption, unless the employer can prove that accommodations to work-around your receiving the vaccination would be an "undue hardship" for the company or that your exemption request is somehow fraudulent. We note that, in the case of Covid-19 vaccinations, it is basically not possible for your employer to show an undue hardship to accommodate your religious beliefs, given both the current data indicating that vaccinations provide zero protection from infection or transmissibility of Covid-19 and the fact that "accommodations" are basically the pre-vaccine protocols used for over a year before mandates were implemented.

If you have been terminated from your job because of your beliefs - in the Covid-19 vaccination mandate context, usually this is due to having been denied a religious exemption - you have a fairly straightforward claim of discrimination based on your religious beliefs. However, short of termination based on your beliefs, if you have been turned down for promotion, demoted, or lost wages due to your religious beliefs and consequent refusal to receive the Covid-19 shots, you also likely have a claim for discrimination in violation of Title VII.

In some cases, other harassment by your employer against you, such as being transferred to another position, enduring ongoing insulting and offensive language labeling you because of your religious beliefs, being singled out, ostracized, and isolated because of your beliefs, etc, may be sufficient facts to establish that you are suffering discrimination for your religious beliefs in violation of Title VII. To be actionable, the conduct that constitutes harassment against you must either be conduct you are required to endure to continue employment or it must rise to such a severe or pervasive degree as to establish a "hostile" work environment to the "reasonable person."

By way of example, in the Covid-19 vaccination mandate/policy context, we have heard of employers requiring unvaccinated employees not to use any restroom facilities that other employees use and to use portable toilets placed outside specifically for use by the unvaccinated; unvaccinated individuals being placed for a period of time on unpaid leave prior to termination; irrational and arbitrary policies designed to identify visually and clearly those who are unvaccinated – with disciplinary measures if employees object or refuse to be so marked; sudden increases in or repetitive punitive actions or disciplinary measures for other non-material matters beginning after the employee disclosed their unvaccinated status or refused to disclose their vaccinated status; denying unvaccinated employees access to Human Resources to discuss their complaints regarding their disparate treatment; managers and supervisors calling the unvaccinated "unclean" and other derogatory words; and the relegation of all unvaccinated employees to separate lunch periods to avoid intermingling of the unvaccinated with vaccinated employees specifically during break times.

#### B. Retaliation under Title VII

It is also unlawful under Title VII for an employer to retaliate against you for exercising your rights under Title VII. Thus, your employer is prohibited from taking "adverse employment action" against you either for objecting to or complaining about their unlawful or discriminatory action under Title VII or for making a claim against your employer for their unlawful conduct, either in an official complaint or procedure or an informal complaint.

Again, as with a discrimination claim under Title VII, adverse employment action in the form of retaliation against you for exercising your rights includes termination, refusal to promote, demotion, and decrease in wages or salary. Other conduct may rise to an actionable level for retaliation if "a reasonable employee would have found the action materially adverse," meaning that the retaliatory conduct would dissuade a reasonable employee from exercising his or her rights in opposing the employer's perceived unlawful discrimination either formally or informally.

# C. Discrimination Due to Being Perceived as Disabled

It is important to note in discussing this claim that we do not consider non-vaccination for Covid-19 a disability, nor are you required to claim disability when you allege that your employer has discriminated against you in violation of the ADA. It is prohibited under the ADA for your employer to discriminate against you not only for any disability so defined, *but also* for a *perceived* disability. If an employer regards you "as having an impairment" to the performance of your work or life activity and discriminates against you based on that perception, you may have a claim under the ADA.

Under a claim of this kind, you are not alleging an impairment or disability, but as an employee, you are alleging that the *employer perceives* you as being disabled by an impairment that is not temporary and is not a minor matter. While there is currently debate over whether a Covid-19 infection is "transitory and minor" as a legal matter, there are sufficient facts to assert that Covid-19 is not fleeting or minor, and indeed, other contagious diseases have been found to be a disability under the law. Most importantly, however, an employer that is engaging in severe restrictions and discriminatory behavior and protocols against you and other employees, while characterizing these as "Covid-19 measures", certainly does not perceive Covid-19 as either transitory or minor.

An employer is required to make an individualized risk assessment, even as to a perceived disability, with regard to the employer's ability to continue your employment and make accommodations for you. In the Covid-19 vaccination context, we have observed zero individualized risk assessments, and instead, it appears that blanket, arbitrary determinations of risk – based on perceived disability - are the common employer response.

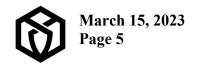
In cases where you have been terminated based on your unvaccinated status, the argument under the ADA is essentially that your employer made an incorrect and unlawful determination that you could not perform your job duties because you are disabled in your medical status as a Covid-19 unvaccinated person and would therefore put the employer (co-workers, guests, customers, etc) at unacceptable risk, such that your perceived disability led to your termination.

In cases where you are suffering other adverse employment actions, including harassment (see above under Title VII claims) the argument regarding this claim is that your suffering unlawful harassment and discrimination is due to your employer's view that you are disabled because of your unvaccinated medical status.

Things we have seen with regard to this claim are absurd and "augmented" protocols that are unrelated to previous pre-vaccination Covid-19 protocols; protocols that emphasize isolation and ostracization of unvaccinated employees (analogous to treatment of "lepers"); and prohibiting unvaccinated employees from performing essential functions of their job solely because they are unvaccinated – essential functions which they were fully able and allowed to perform during the pandemic, but prior to the existence of the Covid-19 vaccines.

# D. Discrimination Due to Medical Condition/Disability

We are not addressing in detail in this memo scenarios where employees have requested an exemption from Covid-19 vaccination on medical grounds and have been denied and/or suffered adverse employment actions as a result. Some such cases may indeed constitute discrimination in violation of ADA protections and/or Title VII. In other cases, the nature or basis for the request for the



medical exemption is not a disability within the meaning of the law, ie: natural immunity, pregnancy, etc.

However, it is important to note in this memo that, if you have requested a medical exemption from a Covid-19 vaccination due to a disability within the meaning of the law, and you have been denied accommodation and/or have otherwise suffered adverse employment action, as we have outlined in this memo, do not fail to include these facts and this claim to your inquiry to the EEOC and ensure that the facts and your claim under the ADA are present in your charge before you submit it. This claim must be brought before the agency before you will be able to assert such a claim before a court.

#### E. Retaliation under ADA

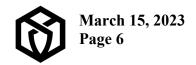
It is prohibited under the ADA for an employer to retaliate against you for opposing or objecting to your employer's unlawful conduct pursuant to the ADA. It is also prohibited for an employer to "coerce, intimidate, threaten or interfere" with your exercise or enjoyment of your rights under the ADA or with your assisting any other individual in the exercise or enjoyment of rights under the ADA.

Much like under Title VII, if you have (1) objected to your employer's treatment of you after you disclosed your unvaccinated status; or (2) complained to or assisted someone in complaining to their employer or union in order to raise an objection to the employer; or (3) have filed any formal complaint against your employer over the employer's treatment of you/them as if disabled, *and* as a result of this objection or other protected activity, your employer takes action against you, you may have a claim of retaliation under the ADA.

#### F. Disparate Impact under Title VII, Equal Protection

Claiming that a Covid-19 vaccination mandate or protocol for the unvaccinated results in a disparate impact on a protected class of employees may be a possible claim, but it may be difficult to prove. In order to make this claim, you generally must show that the protocol in question *causes* a significant disparate impact on the class of employees, including you, who are members of a protected group. In federal law the "protected group" refers to a group with a shared characteristic - race, color, religion, sex, or national origin – against whom discrimination based on this characteristic is prohibited. Under state law, many states have added other protected classes to their civil rights anti-discrimination law, like age, gender identity, and civil/marital status, to name a few.

The most likely style of this claim we have seen in the Covid-19 vaccination mandate and protocols context is that the protocol for the unvaccinated or a vaccination mandate itself disparately impacts those of sincere religious belief because they are statistically more likely to refuse to comply with the mandate -



also in many cases, religious exemptions are statistically being denied at higher rates than other exemptions requested - and therefore the policy/protocol is disproportionately terminating or otherwise adversely affecting employees on the basis of their religion.

# Steps to filing:

- 1. Go to the EEOC Public Portal https://publicportal.eeoc.gov/Portal/Login.aspx; click "Filing with EEOC" and continue by answering the preliminary questions, which include entering the date of the adverse action against you OR the last date of harassment against you, following the prompts.
- 2. At the "Reason" page, we believe your claims based on the guidance above may allow you to click one or more of the boxes in the list:
  - a. Disability
  - b. Religion
  - c. Retaliation I complained to my employer about job discrimination \*If you filed a grievance, complained to your union to pursue a complaint, or filed with the EEOC or state agency regarding your discrimination, or you assisted another employee regarding their claim against the employer, you may also need to check another "Retaliation" box.
- 3. You will be prompted to set up your account with a "Sign In" page.
- 4. Prepare a written statement describing your personal experience of discrimination and/or retaliation by your employer in summary form, but with sufficient detail to provide a clear narrative of the facts of your case, your damages suffered as a result of your employer's unlawful conduct against you, and your request of the agency to investigate and provide you relief.
- 5. File the statement as prompted in your Public Portal account. **Note, your**filing an online inquiry is \*not\* a timely filing of your formal charge. You
  must go through the intake interview and sign and submit a charge to
  meet the deadlines.
- 6. You will be prompted to set up/accept a date for an intake interview with an EEO officer who will go over your submitted inquiry claim(s) and make a determination whether the agency has sufficient information to move forward with a charge against your employer or provide you with a Right to Sue letter. If you are within 60 days until your deadline to submit a timely charge to the EEOC, you may contact the local office and also make a note of the timing urgency in your inquiry, so that the officer that reviews your inquiry can assist you in filing a timely charge.
- 7. At the interview, the officer will seek to verify your statements and may have additional questions for you based on your submitted inquiry statement. You will then be informed whether the officer confirms that your claims are those which the agency is tasked to address through its statutory enforcement authority.

- 8. The officer will prepare a written charge based on your inquiry and your interview information, and you will be prompted by email to visit the Public Portal, log in, and carefully review the charge.
- 9. Make sure that all facts are accurately represented and the other basic information regarding you, your contact information, etc are correct before you e-sign the document as prompted. You may want to have counsel review the charge before you e-sign and submit.
- 10. Once you sign and submit the charge, it is in process with the agency.
- 11. At this point, if you seek to enter legal counsel on your behalf in the agency proceeding, you may enter their information in the Public Portal and/or your counsel may provide notice directly to the agency of their representation in the matter.
- 12. If you are seeking to move forward with judicial review of your employer's unlawful conduct, you MUST await a Right to Sue letter from the agency before a court will allow you to bring your claims for damages before the court. If you seek injunctive relief immediately to stop certain discrimination and harassment against you we can discuss your options on this with you.
- 13. If you want to sue expeditiously, you may request the agency to provide you with the Right to Sue letter in expedited fashion. The agency is not obligated to provide you with the Right to Sue letter unless it has determined it cannot complete its investigation within a 180-day period OR 180 days have lapsed since you submitted your signed charge, and the agency has not completed its investigative process.
- 14. After your charge is filed, the EEOC may suggest mediation, which is entirely voluntary.
- 15. If you pursue Agency action rather than an immediate lawsuit: note that the agency will conduct its investigation, requesting documents and responses from your employer and providing you with a lengthy casefile regarding your claims. This may be very valuable to a later lawsuit, though you must consider statutes of limitations regarding your claims for filing your lawsuit. Additionally, the EEOC, if it determines that your employer has violated law, will issue you and the employer a Letter of Determination regarding the agency's finding of violation. The agency may seek to resolve your claims through "conciliation," which is essentially a voluntary settlement process moderated by the agency. The agency's authority has limits, and a settlement on your claims may not be reached through conciliation. In a few cases, the agency itself may bring a lawsuit against your employer for violation of law.
- 16. If you obtain your Right to Sue and proceed to a lawsuit: you have a deadline of 90 calendar days to bring your complaint before a court and file against your employer. Civil litigation will seek to obtain documents and



- evidence prior to a trial on the claims you bring. Civil litigation may also result in summary judgment or settlement prior to trial.
- 17. In court, you may be awarded relief of monetary damages, including potentially punitive damages, and you may also be awarded attorney's fees, expert witness fees, and court costs.

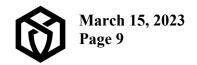
We hope this helps you pursue your claims against your employer for unlawful conduct and retaliation against you for taking your stand regarding your choice for your own body. We are available to counsel you in this process and perhaps represent you in civil litigation, upon doing a full assessment of your claims in our office.

If you have any questions, please feel free to call our office.

#### Other resources:

https://www.eeoc.gov/field-office

https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-adarehabilitation-act-and-other-eeo-laws#K



#### **APPENDIX A**

# Contact information for Fair Employment Practice Agencies in the USA

#### ALABAMA

Alabama Department of Human Resources Office of Equal Employment & Civil Rights 334-242-1550

www.dhr.state.al.us/eeo

#### **ALASKA**

Alaska State Commission on Human Rights 800A Suite 204
Anchorage, AK 99501-3669
907-276-4692
www.gov.state.ak.us/aschr/aschr.htm

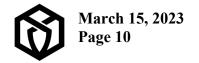
#### **ARIZONA**

Arizona State Attorney General Civil Rights Division 402 W Congress South Bldg. #215 Tucson, AZ 85701 520-628-6500 www.attorney-general.state.az.us/civil\_rights/

#### **CALIFORNIA**

A. Department of Justice, Civil Rights Enforcement Section Public Inquiry Unit P.O. Box 944255 Sacramento, CA 94244-2550 (916) 322-3360 caag.state.ca.us/civilrights/

B. California Dept. of Fair Employment and Housing 2014 T St. Suite 210 Sacramento, CA 95814 916-227-2878



# www.dfeh.ca.gov/

#### **COLORADO**

Colorado Civil Rights Division 1560 Broadway Suite 1050 Denver, CO 80202 303-894-2997 800-262-4845 in state www.dora.state.co.us/civil-rights

#### CONNECTICUT

Connecticut Commission on Human Rights and Opportunities 21 Grand St.
Hartford, CT 06106
860-541-3400
800-477-5737
www.state.ct.us/chro

#### **DELAWARE**

Delaware Human Relations Division 820 French St. 4th Floor Wilmington, DE 19801 302-577-5050 www.state.de.us/sos/human.htm

#### **DISTRICT OF COLUMBIA**

District of Columbia, Office of Human Rights 441 4th St. NW Suite 970N Washington, DC 20001 phone:202-727-3900 fax: 202-724-3786

ohr.dc.gov/



#### **FLORIDA**

Florida Commission on Human Relations Building F Suite 240 325 John Knox Rd. Tallahassee, FL 32399-4149 850-488-7082 800-342-8170 fchr.state.fl.us/

#### **GEORGIA**

Georgia Human Relations Commission 225 Peachtree St. NE Suite 207 Atlanta, GA 30303 404-656-6046 www.ganet.org/ghrc

#### **HAWAII**

Hawaii Civil Rights Commission 830 Punchbowl St. Room 411 Honolulu, HI 96813 808-586-8636 www.state.hi.us/hcrc

#### **IDAHO**

Idaho Human Rights Commission 1109 Main St. 4th Floor P.O. Box 83720 Boise, ID 83720 208-334-2873 www.state.id.us/ihrc



#### **ILLINOIS**

Illinois Dept. of Human Rights 100 W Randolph St. Suite 10-100 Chicago, IL 60601 312-814-6200 800-662-3942 www.state.il.us/dhr

#### **INDIANA**

Indiana Civil Rights Commission 100 N Senate Ave. Room N103 Indianapolis, IN 46204 317-232-2600 800-628-2909 www.state.in.us/icrc

#### **IOWA**

lowa Civil Rights Commission 211 E Maple St. Grimes State Office Bldg. Des Moines, IA 50309-1858 515-281-4121 800-457-4416 www.state.ia.us/government/crc

#### **KANSAS**

Kansas Human Rights Commission 900 SW Jackson St. Suite 851-S Topeka, KS 66612-1258 785-296-3206 www.ink.org/public/khrc

# **KENTUCKY**



Office of Equal Employment Opportunity and Contract Compliance Capitol Annex, Room 370

Frankfort, KY 40601

Telephone: (502) 564-2874 Facsimile: (502) 564-1055

www.state.ky.us/agencies/finance/descript/eeoc.htm

#### **LOUISIANA**

Louisiana Commission on Human Rights 1001 N. 23rd St., Suite 262 Baton Rouge, Louisiana 70802

Phone: (225) 342-6969 Fax: (225) 342-2063 TDD: 1-888-248-0859

www.gov.state.la.us/depts/lchr.htm

#### MAINE

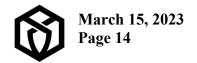
Maine Human Rights Commission 51 State House Station Augusta, ME 04333-0051 207-624-6050 www.state.me.us/mhrc/

#### **MARYLAND**

Maryland Human Rights Commission 6 St. Paul St. 9th Floor Baltimore, MD 21202-1631 410-767-8600 800-637-6247 in state www.mchr.state.md.us

#### **MASSACHUSETTS**

Massachusetts Commission Against Discrimination 1 Ashburton Pl., Room 601 Boston, MA 02108-1518



617-727-3990 www.state.ma.us/mcad/

#### **MICHIGAN**

Michigan Department of Civil Rights Victor Bldg. Suite 700 201 N Washington Square 517-335-3165 www.mdcr.state.mi.us/mdcr/

#### MISSOURI

Missouri Commission Human Rights Department of Labor and Industrial Relations P.O. Box 1129 3315 W Truman Blvd. Jefferson City, MO 65102-3325 573-751-3325 www.dolir.state.mo.us/hr

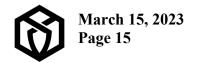
#### **MONTANA**

Dept. of Labor and Industry, Human Rights Commission P.O. Box 1728 Helena, MT 59620 406/444-4344 800-542-0807 in state dli.state.mt.us/decisions/hrcdec.htm

#### **NEBRASKA**

Nebraska Equal Opportunity Commission 301 Centennial Mall South P.O. Box 94934 Lincoln, NE 68509 402-471-2024 800-642-6112

www.nol.org/home/NEOC/



#### **NEVADA**

Dept. of Employment Training and Rehabilitation Nevada Equal Rights Commission 1515 E. Tropicana Ave. Suite 590 Las Vegas, NV 89119-6522 702-486-7161 detr.state.nv.us

#### **NEW HAMPSHIRE**

New Hampshire Human Rights Commission 2 Chenell Dr. Concord, NH 03301 603-271-2767 www.state.nh.us/hrc

#### **NEW JERSEY**

New Jersey Dept. of Law and Public Safety Division on Civil Rights 140 E Front St. P.O. Box 090 Trenton, NJ 08625-0090 609-292-4605 www.state.nj.us/lps/dcr

#### **NEW MEXICO**

New Mexico Human Rights Division Dept. of Labor 1596 Pacheco St. Santa Fe, NM 87502 505-827-6838 800-566-9471 www3.state.nm.us/dol



#### **NEW YORK**

New York State Division of Human Rights 55 W 125th St. New York, NY 10027 212-961-8400 www.nysdhr.com

#### **NORTH CAROLINA**

North Carolina Human Relations Commission 217 W Jones St. 4th Floor Raleigh, NC 27603 919-733-7996 www.doa.state.nc.us/hrc/homepage.htm

#### **NORTH DAKOTA**

North Dakota Dept. of Labor, Division of Human Rights State Capital 600 East Blvd. Bismarck, ND 58505 701-328-2660 800-582-8032 www.state.nd.us/labor/Division of Human Rights.htm

#### OHIO

Ohio Civil Rights Commission 111 E Broad St. Suite 301 Columbus, OH 43205 614-466-5928 www.state.oh.us/crc

# **OKLAHOMA**



Oklahoma Civil Rights Commission 2101 N Lincoln Blvd. Oklahoma City, OK 73105 405-521-2360 www.onenet.net/~ohrc2

#### **OREGON**

Oregon Civil Rights Division Bureau of Labor and Industry 800 NE Oregon St. #32 Suite 1070 Portland, OR 97232 503-731-4075 www.boli.state.or.us/civil

#### **PENNSYLVANIA**

Pennsylvania Human Relations Commission 301 Chestnut Street, Suite 300 Harrisburg, PA 17101

Voice: (717) 787-4410

Telephone: (717) 783-9308 or (717) 787-4087

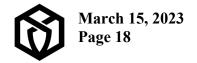
www.phrc.state.pa.us/

#### RHODE ISLAND

Rhode Island Commission for Human Rights 10 Abbott Park Pl. Providence, RI 02903-3768 401-222-2661 www.state.ri.us/manual/data/queres/stdept .idc?id=16

#### **SOUTH CAROLINA**

South Carolina Human Affairs Commission P.O. Box 4490 2611 Forest Dr. Suite 200 Columbia, SC 29240 803-737-7800



www.state.sc.us/schac/

#### **SOUTH DAKOTA**

South Dakota Dept. of Commerce and Regulation Division of Human Rights 118 W Capital Ave. Pierre, SD 57501 605-773-4493 www.state.sd.us/dcr/hr

#### **TENNESSEE**

Tennessee Human Rights Commission 530 Church Street, Suite 400 Cornerstone Square Building Nashville, TN 37243-0745

Phone: 615-741-5825

www.state.tn.us/humanrights/

#### **TEXAS**

Texas Commission on Human Rights P.O. Box 13493 6830 Highway 290 East, Suite 250 Austin, TX 78711 512-437-3450 www.state.tx.us/agency/344.html

#### **UTAH**

**Utah Anti-Discrimination Division** P.O. Box 146640 Salt Lake City, UT 84114-6640 801-530-6801 laborcommission.utah.gov/



#### **VERMONT**

Vermont Human Rights Commission 135 State St. Drawer 33 Montpelier, VT 05633-6301 802-828-2480 www.hrc.state.vt.us/

#### **VIRGINIA**

Council on Human Rights Suite 1202 Washington Bldg. 1100 Bank St. Richmond, VA 23219 804-225-2292 800-633-5510 www.chr.state.va.us

#### WASHINGTON

Washington State Human Rights Commission P.O. Box 42490 711 S Capital Way #402 Olympia, WA 98504-2490 360-753-6770 800-233-3247 www.wa.gov/hrc

#### **WEST VIRGINIA**

West Virginia Human Rights Commission 1321 Plaza East Room 108A Charleston, WV 25301 304-558-2616 888-676-5546 www.state.wv.us/wvhrc



#### **WISCONSIN**

Wisconsin Equal Rights Division Dept. of Workforce Development P.O. Box 8928 201 E Washington Ave. Room 407 Madison, WI 53708-8928 608-266-6860 www.dwd.state.wi.us/er

#### **WYOMING**

Wyoming Department of Employment Labor Standards Fair Employment Program 1510 E. Pershing, West Wing, Suite 2015 Cheyenne, WY 82002 <a href="http://wydoe.state.wy.us/doe.asp?ID=247">http://wydoe.state.wy.us/doe.asp?ID=247</a>