

1 **BEFORE THE ADMINISTRATIVE LAW JUDGE**
2 **FOR A HUMAN RIGHTS COMMISSION HEARING**

3 WASHINGTON STATE HUMAN
4 RIGHTS COMMISSION, presenting
5 the case in support of the complaint
6 filed by Dalia Garcia,

7 Complainant,

8 v.

9 AGRI-PACK, L.L.C.,

10 Respondent.

WSHRC Case No. 11ESX-0050-11-2
OAH Docket No. 02-2016-HRC-00002

NOTICE OF HEARING AND
AMENDED COMPLAINT

11 **TO:**

12 **Dalia Garcia**
13 **1300 N. 24th Avenue, Apt. A3**
14 **Pasco, WA 99301**
15 **Complainant**

Agri-Pack, L.L.C.
P. O. Box 2086
Pasco, WA 99302
Respondent

16 **Lola Velazquez**
17 **Northwest Justice Project**
18 **311 No. 4th Street, Suite 201**
19 **Yakima, WA 98901**
20 **Attorney for Complainant**

Kenneth A. Miller
Miller, Mertens & Comfort, P.L.L.C.
1020 N. Center Parkway, Suite B
Kennewick, WA 99336
Attorney for Respondent

21 **Patricio A. Marquez**
22 **Assistant Attorney General**
23 **Office of the Attorney General**
24 **Civil Rights Unit**
25 **800 5th Avenue, Suite 2000**
26 **Seattle, WA 98104-3188**
Attorney for Washington State Human
Rights Commission

1. Notice

You are hereby notified that the above case has been noted for hearing before an administrative law judge who shall be assigned pursuant to Revised Code of Washington ("RCW") 34.05.410, *et seq.*, and RCW 49.60.250 to preside over the

1 hearing. The contact information for the administrative law judge is:

2 Office of Administrative Hearings
3 949 Market Street
4 Suite 500
5 Tacoma, WA 98402
6 Telephone: (253) 476-6888
7 Fax: (253) 593-2200

8 The Washington State Human Rights Commission has amended the Complainant's Complaint
9 and a copy of the Amended Complaint is served upon you with this notice.

10 **2. Date and Location**

11 The date, time, and place for the hearing are:

12 **Date:** (To be determined)

13 **Time:** (To be determined)

14 **Place:** (To be determined)

15 If the date, time, and place are not included above, you will be notified by the
16 administrative law judge of the date, time, and place for the hearing at least twenty (20) days
17 before the date set for hearing as required by RCW 34.05.434, Washington Administrative
18 Code ("WAC") 10-08-040, RCW 49.60.250 and WAC 162-08-221.

19 **3. Purpose of Hearing**

20 The hearing will be for the purpose of determining whether or not the unfair
21 practices alleged in the Amended Complaint have been committed and, if so, what order is
22 appropriate to eliminate the unfair practices and prevent their recurrence. The unfair
23 practices asserted, the sections of the statute involved, and the relief requested is set forth
24 in the attached copy of the Amended Complaint, which is incorporated herein by reference.

25 **4. Statutory Authority**

26 This hearing will be held pursuant to the Washington State Law Against
Discrimination, and, in particular, RCW 49.60.250, and regulations promulgated thereunder,

1 in particular, WAC 162-08, *et seq.* In addition, procedures at the hearing are governed by
2 WAC 10-08, which sets out the uniform procedural rules for conduct of hearings in
3 adjudicative proceedings under RCW 34.05.

4 **5. Answer of Respondent**

5 To defend against this administrative adjudication, the Respondent must respond to
6 the Amended Complaint attached hereto by stating his, her, or its defense(s) in writing
7 (called an "Answer").

8 Respondent must file the Answer with the Office of Administrative Hearings identified
9 above and serve a copy upon the attorney for the Washington State Human Rights
10 Commission, Patricio A. Marquez, Assistant Attorney General, within twenty (20) days after
11 the service of this notice, excluding the day of service. Respondent's Answer to the
12 Amended Complaint must state briefly and plainly the defenses to each claim asserted, and
13 either admit or deny each statement in the Amended Complaint. Any matter the Respondent
14 wishes to raise which asserts lack of jurisdiction or an affirmative defense must be set
15 forth as such in the answer. For further information on matters which must be stated as
16 affirmative defenses, please refer to WAC 162-08-251, a copy of which is enclosed.

17 **6. Advice of Private Attorney**

18 If Respondent wishes to seek the advice of an attorney in this matter, he/she/it
19 should do so promptly so that the written response, if any, may be timely prepared and served.

20 **7. Notice of Appearance**

21 If Respondent retains an attorney, Respondent's attorney shall file a notice of
22 appearance with the Office of Administrative Hearings identified above and serve a copy upon
23 Patricio A. Marquez, Assistant Attorney General, attorney for the Washington Human Rights
24 Commission. See WAC 10-08-083 for further information on the Notice of Appearance.

1 **8. Default of Respondent**

2 If Respondent does not answer, a default order may be entered against Respondent.
3 A default order is one where Complainant is found to be entitled to the relief requested in the
4 Amended Complaint because the Respondent has not answered. For further information on
5 default orders, see WAC 162-08-255.

6 **9. Attorneys for Washington State Human Rights Commission**

7 The Attorney General's Office (by the Assistant Attorney General identified above)
8 represents the Washington State Human Rights Commission (the "Commission") in
9 presenting the case in support of the Amended Complaint. Complainant may retain
10 independent counsel, as allowed under RCW 49.60.250, and participate in the hearing as a
11 party presenting any issues and testimony that the Commission has chosen not to pursue.

12 **10. Participation by Complainant, Notice of Independent Appearance**

13 If Complainant wishes to submit testimony or otherwise participate in the hearing as
14 a party and not leave the case in support of the complaint to be presented solely by counsel
15 for the Commission, the Complainant must serve on all parties and file a Notice of
16 Independent Appearance within ten (10) days after the Notice of Hearing is served, in
17 accordance with WAC 162-08-261. The Independent Notice of Appearance shall state the
18 address where notices and other documents filed in the case should be sent, and further
19 state whether the Complainant intends to prove additional charges as provided in
20 WAC 162-08-261(2), a copy of which is included with this notice.

21 **11. Record of Hearing**

22 The Commission will arrange for a court reporter to be present to record all testimony
23 at the hearing unless you are notified otherwise.

24 **12. Interpreter**

25 If a limited-English-speaking or hearing impaired party or witness needs an interpreter,
26 a qualified interpreter will be appointed and there will be no cost to the party or witness. If you

1 or your witness(es) require an interpreter, please complete the attached form at least seven (7)
2 days before the hearing date and return the completed form to the attorney for the Washington
3 State Human Rights Commission, Patricio A. Marquez, Assistant Attorney General.
4

5 **13. Accommodation Needs**

6 If you or a witness for you requires an accommodation because of a disability, please
7 complete the attached form at least seven (7) days before the hearing date and returning the
8 completed form to the attorney for the Washington State Human Rights Commission, Patricio
9 A. Marquez, Assistant Attorney General, at the address listed above.

10 **14. Questions**

11 Any questions regarding this hearing should be directed to counsel for the Washington
12 State Human Rights Commission:

13 Patricio A. Marquez
14 Assistant Attorney General
15 Office of the Attorney General
16 Civil Rights Unit
17 800 5th Avenue, Suite 2000
18 Seattle, WA 9810-3188
19 (206) 442-4495
20 patriciom@atg.wa.gov

21 Date:

22 07/22/16

23 
24 _____
25 Laura Skinner
26 Clerk of the Commission

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ATTACHMENTS

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**BEFORE THE ADMINISTRATIVE LAW JUDGE
FOR A HUMAN RIGHTS COMMISSION HEARING**

WASHINGTON STATE HUMAN RIGHTS COMMISSION, presenting the case in support of the complaint filed by Dalia Garcia

WSHRC Case No. 11ESX-0050-11-2
OAH Docket No. 02-2016-HRC-00002

Complainant,

AMENDED COMPLAINT

v.

AGRI-PACK, L.L.C.,

Respondent.

Complainant Washington State Human Rights Commission (“the Commission”) submits this amended complaint and states as follows:

I. UNFAIR PRACTICES ALLEGED

1. This is an action under the Washington Law Against Discrimination to correct unlawful and discriminatory employment practices, and to provide appropriate relief to Dalia Garcia, who was adversely affected by such practices. The Washington State Human Rights Commission (the “Commission”) alleges that Respondent Agri-Pack, L.L.C. (“Agri-Pack”) unlawfully discriminated against its former employee, Dalia Garcia (“Garcia”), by subjecting her to gender identity harassment and refusing to re-hire her based on her gender identity in

1 violation of RCW 49.60.030(1) and RCW 49.60.180. Agri-Pack also discriminates against
2 applicants, employees, and/or prospective employees on the basis of sex, in violation of
3 RCW 49.60.030(1) and RCW 49.60.180.

4 **II. JURISDICTION**

5 2. The Commission has jurisdiction to prosecute this case. *See* RCW 49.60.240
6 and RCW 49.60.250. RCW 49.60.240 authorizes the Commission to investigate complaints
7 of discrimination and, once it makes a finding of reasonable cause to believe discrimination
8 has occurred, to seek relief for such discrimination. If an agreement to eliminate the unfair
9 practice is not reached, RCW 49.60.250 allows the Commission to request appointment of an
10 administrative law judge to hear its complaint.

11 **III. FACTUAL BASIS FOR ALLEGATIONS**

12 3. Agri-Pack is a fresh produce packing facility. It is located in Pasco,
13 Washington.

14 4. Dalia Garcia is a transgender woman.

15 5. Agri-Pack's standard hiring practice is to determine how many employees are
16 needed, then hire the appropriate number from among the job applicants who assemble
17 outside of Agri-Pack's facility on a given day.

18 6. After standing in line for a job outside Agri-Pack's packing plant, Ms. Garcia
19 was motioned inside by Agri-Pack's plant manager, Tim Session, on or about August 18,
20 2010, and hired as a vegetable sorter by supervisor, Rosa Mendoza. At the time, Mr. Session
21 did not know Ms. Garcia is transgender.

22 7. Agri-Pack has a general policy of hiring only women to work as vegetable
23 sorters. Mr. Session believes women are better at sorting vegetables than men. Men are
24

1 assigned as vegetable sorters only if they require light duty work as a reasonable
2 accommodation for an injury.

3 8. Agri-Pack assigned Ms. Garcia to the onion packing line, where she was
4 supervised by Rosa Mendoza. In August 2010, Ms. Mendoza was a floor supervisor who had
5 worked for Agri-Pack for approximately ten years.

6 9. After working for a short while on her date of hire, Ms. Garcia was told to go
7 to the office to fill out employment forms. Ms. Garcia used her legal name, Edgar Garcia, on
8 the forms. Her supervisor, Rosa Mendoza, took note of her documents.

9 10. Initially, Ms. Garcia worked on the onion packing line without incident.
10 However, after her first few days on the job, Ms. Mendoza and Mr. Session (through
11 messages communicated through Ms. Mendoza) started harassing Ms. Garcia based on her
12 gender identity.

13 11. A few days into her employment, Ms. Mendoza told Ms. Garcia that Mr.
14 Session hired her because he thought Ms. Garcia was a woman, and that when he discovered
15 that Ms. Garcia was born male, he regretted the decision.

16 12. Ms. Mendoza repeatedly told Ms. Garcia that she was not dressed
17 appropriately, at times claiming to be communicating the message on behalf of Mr. Session.
18 Agri-Pack's employee handbook requires "appropriate clothing and shoes," but does not
19 define what is "appropriate."

20 13. For example, Ms. Mendoza frequently told Ms. Garcia that her shirts were too
21 low-cut or too pretty (e.g. spaghetti straps). Several times Ms. Garcia was told to change and
22 wear her shirt with the back side to the front, or cover up with a sweater. Ms. Mendoza did
23 not subject other women on the line who wore similar clothing to the same treatment.

24 14. Agri-Pack's employee handbook requires long hair be "restrained."

1 15. Ms. Garcia regularly came to work freshly showered and would wear her wet
2 hair in a ponytail. When Ms. Garcia wore her hair in a ponytail, Ms. Mendoza repeatedly
3 told Ms. Garcia to put her hair up. Other women on the line would also come to work with
4 their hair in a ponytail, but Ms. Mendoza would not require them to put their hair up.

5 16. Ms. Mendoza and/or Mr. Session communicated these “dress code violations”
6 to Ms. Garcia, and/or told Ms. Garcia to change or put her hair up, despite allowing many
7 other women to work the onion line wearing similar blouses, with their hair down, and even
8 jewelry “other than a wedding band,” which was prohibited by Agri-Pack’s employee
9 handbook.

10 17. In addition to harassing Ms. Garcia about her clothing and hair, Ms. Mendoza
11 also told Ms. Garcia that the women on the onion packing line did not want Ms. Garcia to use
12 the women’s bathroom because they were worried about catching a sexually transmitted
13 disease. Ms. Mendoza mockingly told Ms. Garcia that, as a result of these “complaints,”
14 Agri-Pack was thinking about renting a porta potty to put outside for her. Ms. Garcia asked
15 her co-workers whether what Ms. Mendoza said was true. They told her it was not, and they
16 had not said the things Ms. Mendoza claimed.

17 18. On another occasion, Ms. Garcia experienced trouble with her car that caused
18 her to arrive late to work. Ms. Mendoza sternly reprimanded Ms. Garcia for arriving late.
19 When one of Ms. Garcia’s co-workers arrived even later and was not reprimanded, Ms.
20 Garcia asked Ms. Mendoza why her co-worker was allowed to arrive late without a
21 reprimand. Ms. Mendoza responded that the co-worker was excused because she had
22 children, of which Ms. Garcia was incapable.

1 19. Ms. Mendoza mocked, harassed and humiliated Ms. Garcia on the basis of her
2 gender identity in these and other manners throughout the course of her employment with
3 Agri-Pack.

4 20. Ms. Garcia twice-attempted, crying and upset, to report the harassment to
5 Human Resources. Each time, Alicia, the Human Resources receptionist, told Ms. Garcia
6 that a Human Resources representative was not available.

7 21. On June 8, 2011, Agri-Pack temporarily laid off Ms. Garcia and sixteen other
8 employees.

9 22. Lay-offs routinely occur when Agri-Pack waits for more produce to be
10 delivered to its processing facility. Once produce is delivered, Agri-Pack notifies its laid off
11 employees by telephone of the restart date and time to return to work. Rehired employees
12 must physically report to work on time the first day of the restart because Agri-Pack does not
13 hold jobs open. Any open positions not filled by returning employees are promptly filled by
14 new hires.

15 23. On or about Thursday, June 16, 2011, or Friday, June 17, 2011, Ms. Mendoza
16 began calling laid off employees to notify them that work would re-start in one week, on
17 Thursday, June 23, 2011.

18 24. When Ms. Mendoza contacted Ms. Garcia, she told Ms. Garcia that work
19 would start in two weeks, on or about June 30, 2011.

20 25. Ms. Garcia, who was in California at the time, subsequently spoke to one of
21 her co-workers at Agri-Pack. Her co-worker asked if she would be coming back to work the
22 next day, on Thursday, June 23, 2011.

1 26. Confused, because she thought work would not start for another week, Ms.
2 Garcia called Ms. Mendoza to ask about the start date. Ms. Mendoza responded, “Tim said
3 there’s no more work for *you* here.”

4 27. When Ms. Garcia asked, “Why doesn’t he want me back? Because of the way
5 I am?” Ms. Mendoza answered, “Yes.”

6 28. On Thursday, June 23, 2011, Agri-Pack replaced Ms. Garcia. Agri-Pack re-
7 hired several returning employees and hired nine new female vegetable sorters to fill the
8 remaining positions.

9 29. An Agri-Pack employee who knew Ms. Garcia to be a good worker asked Ms.
10 Mendoza why Ms. Garcia had not been rehired. Ms. Mendoza responded, “Because she’s a
11 man. They [referring to Mr. Session and/or Agri-Pack] don’t want men sorting.”

12 **IV. FIRST CAUSE OF ACTION**
13 **(Violations of the Washington Law Against Discrimination –**
14 **Discrimination Based on Gender Identity)**

15 30. The Commission realleges and incorporates by reference the allegations set
16 forth in each of the preceding paragraphs of this Amended Complaint.

17 31. Agri-Pack’s decision not to re-hire Ms. Garcia based on her gender identity
18 violated the WLAD. *See* RCW 49.60.180(1) (“It is an unfair practice for any employer “[t]o
19 refuse to hire any person because of . . . sex . . . [or] sexual orientation.”);
20 RCW 49.60.040(26) (defining “sexual orientation” to include “gender expression or
21 identity”).

22 32. Further, Ms. Mendoza and Mr. Session harassed Ms. Garcia based on her
23 gender identity. Ms. Mendoza and Mr. Session violated the WLAD by discriminatorily
24 enforcing dress and grooming standards against Ms. Garcia, apparently because she dressed
and groomed in a manner consistent with her gender identity as a woman, and not like a man.

1 See WAC 162-32-050 (employers “cannot require an individual to dress or groom in a
2 manner that is not consistent with that individuals’ gender expression or gender identity.”).
3 Further, Ms. Mendoza’s harassment of Ms. Garcia as a result of her use of the women’s
4 bathroom, for alleged fear of sexually-transmitted diseases, resulted in Ms. Garcia being
5 denied an equal opportunity to work based on her gender identity. See RCW 49.60.180(3)
6 (prohibiting “discriminat[ion] against any person in compensation or in other terms or
7 conditions of employment because of . . . sex . . . [or] sexual orientation.”); WAC 162-32-
8 030 (“Sexual orientation or gender expression or gender identity harassment in employment
9 is offensive and unwelcome behavior serious enough to affect the terms and conditions of
10 employment”); WAC 162-32-060(1) (“All covered entities shall allow individuals the use of
11 gender-segregated facilities, such as restrooms . . . that are consistent with that individual’s
12 gender expression or gender identity.”).

13 33. Agri-Pack is liable for the discriminatory conduct of Ms. Mendoza and Mr.
14 Session. WAC 162-32-030 (noting sexual orientation or gender expression or gender
15 identity harassment “can be imputed to the employer.”).

16 34. As a proximate cause of Agri-Pack’s discrimination, Ms. Garcia has suffered
17 damages including lost wages and benefits, expenses incurred due to Agri-Pack’s
18 discrimination, inconvenience caused by participating in the investigation and prosecution of
19 her discrimination complaint, pain and suffering, financial hardship, embarrassment,
20 humiliation, emotional distress, and other damages to be proved at the hearing.

21 **V. SECOND CAUSE OF ACTION**
22 **(Violation of the Washington Law Against Discrimination –**
23 **Sex Discrimination)**

24 35. The Commission realleges and incorporates by reference the allegations set
forth in each of the preceding paragraphs of this Amended Complaint.

1 36. Agri-Pack had an employment policy and practice of hiring only women to be
2 vegetable sorters. Agri-Pack refused to hire men to be vegetable sorters.

3 37. Agri-Pack's refusal to hire male employees or prospective employees to be
4 vegetable sorters, based on sex, violated the WLAD. *See* RCW 49.60.180(1) ("It is an unfair
5 practice for any employer . . . [t]o refuse to hire any person because of . . . sex . . .").

6 38. On information and belief, Agri-Pack has not ceased its policy and practice of
7 hiring only women to be vegetable sorters.

8 39. Accordingly, the Commission requests an order that will eliminate and/or
9 prevent recurrence of the above-described discriminatory hiring practices.

10 VI. REQUEST FOR RELIEF

11 40. Ms. Garcia should be awarded back pay, reinstatement or front pay, including
12 all fringe benefits; expenses incurred due to Agri-Pack's discrimination; inconvenience
13 caused by participating in the investigation and prosecution of her discrimination complaint;
14 pain and suffering; financial hardship; embarrassment; humiliation; emotional distress; and
15 other damages to be proved at hearing.

16 41. Agri-Pack employees who participate in management activities should be
17 ordered to attend a complete session of equal employment opportunity training approved by
18 the Commission and/or the Attorney General's Civil Rights Unit.

19 42. Agri-Pack should be enjoined from discriminating against and/or harassing
20 persons based on sex, gender identity, or sexual orientation, and should be required to change
21 its policies and procedures to comply with this injunction.

22 43. Agri-Pack should revise its employee manual to clarify that its policies and
23 procedures comply with this injunction and that Agri-Pack welcomes employees regardless
24 of sex, gender identity, or sexual orientation.

1 I, Sharon Ortiz, Executive Director of the Commission, verify that I have reviewed the
2 above amended complaint and that the unfair practices charged, the factual allegations set
3 forth, and the relief requested are true, correct and appropriate to the best of my knowledge and
4 belief.

5 Signed this 12 day of July, 2016

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7 Sharon Ortiz
8 Executive Director
9 Washington State Human Rights Commission
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WAC 162-08-251**Answer.**

(1) **Required.** Every respondent shall file an answer to the amended complaint attached to the notice of hearing, and to any subsequent amendments or complaints that are filed.

(2) **Content.** The answer shall set out and assert every defense, in law or fact, to the claims of the complaint being answered.

(3) **Waiver of defenses not pleaded.** Defenses not pleaded in an answer are waived.

(4) **Time for filing.** An answer shall be filed within twenty days after notice of hearing is served, unless an extension of time is granted in writing by the administrative law judge.

(5) **Form of defenses and denials.** A respondent shall state in short and plain terms its defenses to each claim asserted and shall admit or deny each averment of the amended complaint. If the respondent is without knowledge or information sufficient to form a belief as to the truth of an averment, the respondent shall so state and this has the effect of a denial. Denials shall fairly meet the substance of the averments denied. When a respondent intends in good faith to deny only a part or a qualification of an averment, the respondent shall specify so much of it as is true and material and shall deny only the remainder.

(6) **Affirmative defenses.** A respondent who wishes to raise any matter constituting an avoidance or affirmative defense, including those required to be set forth affirmatively by CR 8 (c), must plead the matter as an affirmative defense in the respondent's answer. Among the matters which must be pleaded as affirmative defenses are the following:

(a) A bona fide occupational qualification;

(b) Business necessity that justifies a practice that has a discriminatory effect; and

(c) That another statute or rule of law precludes or limits enforcement of the law against discrimination, or regulations or precedents of the commission.

(7) **Statutory steps.** Any defense that the hearing cannot be held because the respondent has been prejudiced because statutory steps prior to hearing have not been taken, or because of some irregularity in statutory procedure, must be pleaded in the answer by specific negative averment, which shall include such supporting particulars as are within the answering respondent's knowledge or could reasonably have been learned by the answering respondent.

(8) **Obligation of good faith.** The assertion of denials and defenses is subject to the obligation of good faith set out in WAC 162-08-241(3) and CR-11.

(9) **Reply.** Unless the administrative law judge orders that a reply to an answer be filed, none shall be necessary. Averments in an answer shall be deemed denied or avoided.

[Statutory Authority: RCW 49.60.120(3). WSR 89-23-020, § 162-08-251, filed 11/7/89, effective 12/8/89; Order 35, § 162-08-251, filed 9/2/77; Order 7, § 162-08-251, filed 1/19/68.]

WAC 162-08-261

Complainant's participation.

(1) **Notice of independent appearance.** A complainant or aggrieved person under RCW 49.60.040(15) who desires to submit testimony or otherwise participate in the hearing as a party and not to leave the case in support of the complaint to be presented solely by counsel for the commission, must serve and file a notice of independent appearance within ten days after the notice of hearing is served on that complainant. The notice shall state the address where notices to the complainant shall be sent and it shall state whether the complainant elects to prove additional charges as provided in subsection (2) of this section.

(2) **Election to prove additional charges.** A complainant or aggrieved person under RCW 49.60.040(15) who has filed a notice of independent appearance stating an intention to prove additional charges in accordance with RCW 49.60.250(2), may at the hearing offer proof of averments included in the original complaint or in amendments to the original complaint made by the complainant, whether or not the averments are included in the amended complaint under which counsel for the commission is proceeding. For purposes of this section, the complainant may amend the original complaint without regard to intervening amendments made by the commission. The complainant may serve and file an amended complaint with a notice of independent appearance, or thereafter as provided by these rules. If no amended complaint is served with a notice of independent appearance that states an intention to prove additional charges, the clerk shall promptly place the original complaint in the file for the administrative law judge. Nothing done by the complainant under this rule shall place any duty on counsel for the commission to seek to prove matters not averred in the amended complaint accompanying the notice of hearing, or subsequent amendments by the commission.

(3) **Appearance without election.** If the complainant or aggrieved person under RCW 49.60.040(15) files a notice of independent appearance which does not state that he or she elects to prove additional charges, then the complainant's participation in the hearing shall be confined to the matters raised by the amended complaint filed with the notice of hearing, and subsequent amendments made by the commission.

(4) **When no independent appearance.** If the complainant or aggrieved person under RCW 49.60.040(15) does not file a notice of independent appearance as provided by this rule, the case in support of the complaint shall be presented solely by counsel for the commission.

[Statutory Authority: RCW 49.60.120(3) and 49.60.240. WSR 96-13-045, § 162-08-261, filed 6/13/96, effective 7/14/96. Statutory Authority: RCW 49.60.120(3). WSR 89-23-020, § 162-08-261, filed 11/7/89, effective 12/8/89; Order 35, § 162-08-261, filed 9/2/77; Order 7, § 162-08-261, filed 1/19/68.]



WASHINGTON STATE HUMAN RIGHTS COMMISSION
REQUEST FOR INTERPRETER OR OTHER ACCOMMODATIONS

<i>CASE NAME:</i>	<i>WSHRC CASE NO.:</i>	<i>OAH DOCKET NO.:</i>
Garcia, Dalia v. Agri-Pack, L.L.C.	11ESX-0050-11-2	02-2016-HRC-00002

My name is: _____

(Check the boxes that apply to you)

I need an interpreter.

The language I prefer to participate in is: _____

I am hearing impaired.

[] I need an ASL interpreter

[] I will participate by TTY operator.

[] I request an in-person hearing.

[] Other _____

I need the following accommodation(s) because of my disability:

Please return this completed form to:

Patricio A. Marquez
Assistant Attorney General
Office of the Attorney General
Civil Rights Unit
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 442-4495
patriciom@atg.wa.gov