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

7 WASHINGTON STATE HUMAN
8 RIGHTS COMMISSION, presenting
9 the case in support of the complaint
10 filed by CONI S. OAKES

11 Complainant,

12 v.

13 THOMAS M. STIGER, in his individual
14 capacity and doing business as STIGER
15 RENTALS,

16 Respondent.

WSHRC Case No. 31HD-0225-17-8
OAH Docket No. 03-2020-HRC-00006

AMENDED COMPLAINT

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

19 **I. UNFAIR PRACTICES ALLEGED**

20 1. This is an action under the Washington Law Against Discrimination to correct
21 unlawful and discriminatory housing practices, and to provide appropriate relief to Coni S.
22 Oakes, who was adversely affected by such practices. The Commission alleges that
23 Respondent Thomas M. Stiger, in his individual capacity and doing business as Stiger Rentals
24 (Stiger), unlawfully discriminated against Ms. Oakes when he failed to reasonably
25 accommodate her disability in violation of RCW 49.60.030(1)(c) and RCW 49.60.222(2)(b).

26 **II. JURISDICTION**

27 2. The Commission has jurisdiction to prosecute this case. RCW 49.60.240, .250.
28 RCW 49.60.240(1)(c) requires the Commission to investigate complaints of housing

1 discrimination and, once it makes a finding of reasonable cause to believe discrimination has
2 occurred, to seek relief for such discrimination. If an agreement to eliminate the unfair practice
3 is not reached, RCW 49.60.250(1) directs the Commission to request appointment of an
4 administrative law judge to hear its complaint.

5 III. FACTUAL BASIS FOR ALLEGATIONS

6 3. Ms. Oakes is an individual with a disability. She has multiple chemical
7 sensitivity (MCS).

8 4. On August 20, 2015, Ms. Oakes entered into an agreement to rent a one-
9 bedroom apartment in the Terrace Park Apartments, located at 725 East 5th Street, Arlington,
10 Washington, from Stiger.

11 5. Stiger is the owner and landlord of the Terrace Park Apartments.

12 6. Ms. Oakes moved into Unit 12 of the Terrace Park Apartments in September
13 2015 and continues to reside there.

14 7. In or around June 2016, Ms. Oakes provided Stiger with notice of her
15 disability—MCS—and her need for a reasonable accommodation.

16 8. In August 2017, another tenant of the Terrace Park Apartment reported to Stiger
17 an insect infestation near Ms. Oakes's apartment unit.


18 9. Prior to this insect infestation, Stiger was aware of Ms. Oakes's disability.

19 10. In or around August 2017, Ms. Oakes spoke with Stiger and requested, as a
20 reasonable accommodation for her disability, that, prior to treating the insect infestation, he
21 provide her with information about the product he planned to use to treat the insect infestation.
22 Stiger agreed to provide Ms. Oakes with this information before treating the reported insect
23 infestation.

24 11. In or around August 25, 2017, Stiger sprayed a pesticide near and/or around
25 Ms. Oakes's front door and apartment unit.
26

1 DATED this 23rd day of March 2020.

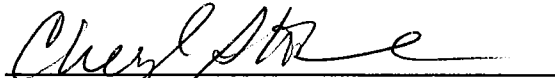
2 ROBERT W. FERGUSON
3 Attorney General

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

4 Signed this 20th day of March, 2020

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7 CHERYL STROBERT
8 Deputy Director
9 Washington State Human Rights Commission
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