

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE CHIEF ADMINISTRATIVE HEARING OFFICER

DEPARTMENT OF JUSTICE

AUG 30 PM 2:29

CHIEF ADMINISTRATION
HEARING OFFICE

UNITED STATES OF AMERICA,

COMPLAINANT,

v.

MARICOPA COUNTY COMMUNITY
COLLEGE DISTRICT D/B/A
MARICOPA COMMUNITY
COLLEGES,

RESPONDENT.

COPY

8 U.S.C. § 1324b PROCEEDING

OCAHO CASE NO. 10B00099

**COMPLAINT REGARDING
IMMIGRATION RELATED UNFAIR EMPLOYMENT PRACTICES**

Complainant, the United States of America, alleges as follows:

1. This action is brought on behalf of the Office of Special Counsel for Immigration Related Unfair Employment Practices (the "Office of Special Counsel") to enforce the provisions of the Immigration and Nationality Act relating to immigration-related unfair employment practices pursuant to 8 U.S.C. § 1324b ("INA").
2. The anti-discrimination provisions of the INA protect individuals who are authorized to work in the United States from employment discrimination based on their citizenship or immigration status, or their national origin, and from unfair documentary practices relating to the employment eligibility verification process.
3. This suit arises out of the discriminatory conduct by the Maricopa County Community College District ("Respondent") in violation of the anti-discrimination provisions of the

INA, 8 U.S.C. § 1324b(a)(1)(B) and (6), with regard to the discriminatory treatment of certain individuals in the hiring and employment eligibility verification process.

JURISDICTION

4. Pursuant to 8 U.S.C. § 1324b(c)(2) and (d)(1), the Office of Special Counsel is charged with investigating charges, initiating investigations and prosecuting complaints alleging immigration-related unfair employment practices.
5. [REDACTED] (“Charging Party”) is a lawful permanent resident and is protected from discrimination on the basis of citizenship status in the employment eligibility verification process (“document abuse”) under 8 U.S.C. § 1324b(a)(6).
6. Respondent is comprised of ten colleges and two skill centers.
7. Each of Respondent’s colleges is individually accredited.
8. Respondent is a person or entity within the meaning of 8 U.S.C. § 1324b(a)(1) and employed more than three employees on the date of the alleged immigration-related unfair employment practices described below.
9. On January 29, 2009, 177 days after the Respondent committed document abuse against the Charging Party, the Office of Special Counsel accepted as complete a charge alleging citizenship status discrimination, national origin discrimination, retaliation and document abuse (“Attachment A”) from the Charging Party against Glendale Community College, a campus of Respondent.
10. On June 5, 2009, the Charging Party received notice (“Attachment B”) by certified mail from OSC that it was continuing its investigation of the charge and that the charging Party had the right to file his own complaint before an Administrative Law Judge.

11. On July 30, 2009, the parties reached an agreement ("Attachment C") that extended the United States' complaint filing period until October 4, 2009.
12. Subsequently complaint filing extension agreements were executed on September 21, 2009 ("Attachment D"), November 4, 2009 ("Attachment E"), February 18, 2010 ("Attachment F"), April 13, 2010 ("Attachment G"), June 3, 2010 ("Attachment H"), June 30, 2010 ("Attachment I"), and August 16, 2010 ("Attachment J"). The most recent agreement extended the United States' complaint filing period until August 30, 2010.
13. Jurisdiction of the Office of the Chief Administrative Hearing Officer is invoked pursuant to 8 U.S.C. § 1324b(e)(1).

STATEMENT OF FACTS

14. The immigration-related unfair employment practices described below occurred in various locations in Maricopa County, Arizona.
15. In August 2008, Respondent extended to the Charging Party an offer for a part-time position teaching mathematics at Glendale Community College for the fall 2008 semester.
16. On August 5, 2008, the Charging Party completed new hire paperwork at Respondent's Glendale Community College campus.
17. At that time, the Charging Party completed a U.S. Department of Homeland Security ("DHS") Employment Eligibility Verification Form ("Form I-9").
18. The Charging Party attested in his Form I-9 to being a lawful permanent resident.
19. The Charging Party produced a California driver's license and unrestricted Social Security Account Number card to complete his Form I-9.

20. Respondent accepted the Charging Party's driver's license and Social Security card without question.
21. After submitting his Form I-9, the Charging Party was asked to complete an internal Non-U.S. Citizen Employee Tax Data Form ("the Form").
22. The Form asked for immigration-related information and listed specific documents required to be provided with the completed form.
23. The documents required to be provided with the Form included documents issued by DHS or the former Immigration and Naturalization Service ("INS") establishing the employee's employment eligibility and a Social Security card.
24. The Form's document requirement was intended to verify an employee's employment eligibility.
25. The Form's document requirement was not intended for a tax-related purpose.
26. The Form stated that a lawful permanent resident was required to provide his or her "Resident Alien 'Green Card' or I-551 issued by DHS, and copy of social security card."
27. The Charging Party was unable to produce his Permanent Resident Card (Form I-551).
28. The Charging Party was told by Respondent's Human Resources representatives that he was required to provide his Form I-551 in order for his new hire paperwork to be processed.
29. As a result of the Charging Party's failure to produce his Form I-551, the Charging Party was not permitted to work.
30. Since at least 2008, if not earlier, only non-U.S. citizens hired by Respondent were required to comply with the specific documentation requirements of the Form in order to work.

31. Between July 15, 2008, and approximately January 4, 2010, approximately 247 non-U.S. citizens were required to complete the Form or otherwise provide documentation establishing their employment authorization beyond the Form I-9's requirements.
32. Since at least 2008, if not earlier, Respondent required certain employees who are non-U.S. citizens to provide specific and/or more documents than are required to establish their employment eligibility, but allowed employees who are U.S. citizens to provide any document, or combination of documents, permitted on the Form I-9.

COUNT I
DOCUMENT ABUSE AGAINST [REDACTED] AND
OTHER SIMILARLY SITUATED PARTIES

33. Complainant incorporates by reference the allegations set forth in paragraphs 1 through 32 as if fully set forth herein.
34. Respondent knowingly and intentionally committed document abuse discrimination against the Charging Party and other similarly situated individuals when it required that they provide specified documents, including employment eligibility documents issued by INS or DHS in order to verify their employment eligibility.
35. Respondent's actions constitute a pattern or practice of document abuse in violation of 8 U.S.C. § 1324b(a)(6).

COUNT II
PATTERN OR PRACTICE OF DISCRIMINATION
IN THE HIRING PROCESS

36. Complainant incorporates by reference the allegations set forth in paragraphs 1 through 32 as if fully set forth herein.
37. Since at least 2008, and until January 4, 2010, Respondent's standard practice and regular operating procedure was to request that non-U.S. citizen new hires produce specified documents issued by INS or DHS during the hiring process.

38. In contrast, since at least 2008, Respondent's standard practice and regular operating procedure has been not to request specific documents during the hiring process from U.S. citizen new hires.
39. Respondent's actions constitute a pattern or practice of citizenship status discrimination in violation of 8 U.S.C. § 1324b(a)(1)(B).

THEREFORE, Complainant respectfully requests:

- A. That the Office of the Chief Administrative Hearing Officer assign an Administrative Law Judge to preside at a hearing on this matter as soon as practicable; and
- B. That the Administrative Law Judge grant the following relief:
 1. Order Respondent to cease and desist from the alleged illegal practices described in the complaint;
 2. Order Respondent to provide full remedial relief to [REDACTED] and other work-authorized non-citizens for the losses they have suffered as a result of the discrimination alleged in this complaint.
 3. Take other appropriate measures to overcome the effects of the discriminatory practices.
 4. Order Respondent to pay a civil penalty of \$1,100 for each work-authorized non-U.S. citizen who was required to supply additional work authorization documentation.

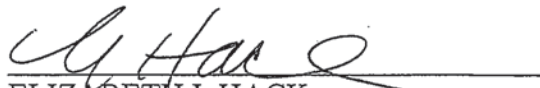
The complainant prays for such additional relief as justice may require.

THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division

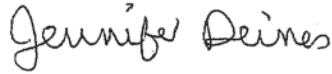
By:



KATHERINE A. BALDWIN
Deputy Special Counsel
Office of Special Counsel for Immigration-Related
Unfair Employment Practices



ELIZABETH I. HACK
Special Litigation Counsel
Office of Special Counsel for Immigration-Related
Unfair Employment Practices



JENNIFER DEINES
RONALD LEE
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Office of Special Counsel for Immigration-Related
Unfair Employment Practices
950 Pennsylvania Ave., N.W.
Washington, DC 20530
Telephone: (202) 616-5594
Facsimile: (202) 616-5509

Dated: August 30, 2010

Attachment A

U.S. Department of Justice
Office of Special Counsel

RECEIVED
CIVIL RIGHTS DIVISION
2009 JAN 29 AM 11:01

Charge Form for Unfair Immigration-Related
Employment Practices Instructions

Instructions

This charge form is to be used only to file a charge alleging an unfair immigration-related employment practice in violation of 8 U.S.C. §1324b. This charge form must be filed with the Office of Special Counsel for Immigration Related Unfair Employment Practices.

U.S. Department of Justice
Civil Rights Division
Office of Special Counsel for Immigration Related Unfair Employment Practices
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

On the form, "Injured Party" means a person who claims to have been adversely affected directly by an unfair immigration-related employment practice or, in the case of a charge filed by an officer of the Immigration and Naturalization Service or by a Charging Party other than the Injured Party, is alleged to be so affected.

On the form, "Charging Party" means: (1) an individual who files a charge with the Special Counsel that alleges that he or she has been adversely affected directly by an unfair immigration-related employment practice; or (2) an individual or private organization who is authorized by an individual to file a charge with the Special Counsel that alleges that the individual has been adversely affected directly by an unfair immigration-related employment practice; or (3) an officer of the Immigration and Naturalization Service who files a charge with the Special Counsel that alleges that an unfair immigration-related practice has occurred.

The "Charging Party" should complete the charge form in its entirety by typing, or neatly printing, the information requested. If a question is not applicable, it should be left blank.

This charge form must be delivered or mailed to the Office of Special Counsel within 180 days of the alleged discrimination.

Questions concerning this charge form can be directed to the Office of Special Counsel by mail at the above address or by telephone at (202) 616-5594 or 1-800-255-7688 (toll free), TDD (202) 616-5525 or 1-800-237-2515 (toll free).

1. Charging Party

Full Name: [REDACTED] Telephone: [REDACTED]
() [REDACTED]
Other Names Ever Used:

Street Address: [REDACTED]
City: [REDACTED] State: [REDACTED] Zip Code: [REDACTED]

Injured Party (IF INJURED PARTY is same as CHARGING PARTY, write "same")

Full Name: SAME Telephone: ()
Other Names Ever Used:

Street Address:
City: [REDACTED] State: [REDACTED] Zip Code: [REDACTED]

2. Individual, Business or Entity Which You Believe Has Committed Unfair Employment Practice:

Full Name: Glendale Community College Telephone: ()
Street Address: 6000 West Olive Avenue
City: Glendale State: AZ Zip Code: 85302

Formerly Form CRT-37 which is obsolete.

Form OSC-1
Nov. 01

3. Individual, Business or Entity Has (check one):

☐ Less than 15 employees, but more than 3 employees.

☒ 15 or more employees.

☐ Unable to estimate number of employees.

4. Injured Party Has Suffered an Unfair Immigration-Related Employment Practices (check one or more)

☒ National Origin Discrimination (with respect to the hiring, recruitment or referral, or discharging of the Injured Party)

☒ Citizenship Status Discrimination (with respect to the hiring, recruitment or referral, or discharging of the Injured Party)

☒ Retaliation for Asserting Rights Protected Under 8 U.S.C. §1324b

☒ Document Abuse (The individual, business, or organization refused to accept a valid document or demanded more or different documents that are required for completing the INS Form I-9)

5. Injured Party Is:

☐ Citizen or National of the United States (if this box is marked continue on to #6)

☒ Alien Authorized to Work in the United States (if this box is marked you must complete the rest of #5)

If INJURED PARTY is an alien authorized to work in the United States:

Alien Registration Number (s):

Date of Birth: (day) (month) (year)

If INJURED PARTY is an alien authorized to work in the United States:

Injured Party (check one if applicable):

☒ Is lawfully admitted for permanent residence
date granted:

☐ Has status of a alien lawfully admitted for temporary residence
under 8 U.S.C. §1160(a), 8 U.S.C. §1161(a), or 8 U.S.C.
§1255(a)(1)

☐ Is admitted as refugee under 8 U.S.C. §1157

☐ Has been granted asylum under 8 U.S.C. §1158

☐ Is Otherwise Authorized to work

Injured Party (check one):

☐ Has applied for naturalization

☒ Has not applied for naturalization

Date of Application:

6. When did the unfair practice occur: (date) August 5, 2008 to August 7, 2008

7. Where did the unfair practice occur: (Place) Glendale Community College

8. Has a charge based on this set of facts been filed with the Equal Employment Opportunity Commission, or other
No.

governmental agency?

☐ Yes

If yes, which office?

☒ No
Address:

City: _____ State: _____ Zip Code: _____

Date Filed: _____ File No. (if known): _____

9. Describe the Unfair Employment Practice (use additional sheets if necessary)

See attached summary.

10. Affirmation and Signature of Charging Party

(a) If this charge is being filed by the Injured Party:

As a person alleging that I have been injured by an unfair immigration-related employment practice, I understand that the Office of Special Counsel may find it necessary to reveal my identity and other information during the conduct of the investigation of my charge, during any hearing or other proceeding as result of my charge, or in limited circumstances in response to inquiries under the Freedom of Information Act. I give my consent. I affirm that, to the best of my knowledge, the information provided on this form is true.

[Redacted Signature]

(Date)

1/26/09

(b) If this charge is being filed by an authorized representative of the Injured Party:

I affirm that, to the best of my knowledge, the information provided on this form is true and that I am authorized to file this charge on behalf of the Injured Party. I understand that the Office of Special Counsel may find it necessary to reveal my identity during the conduct of the investigation of this charge, during a hearing or other proceeding as a result of this charge, or in limited circumstances in response to inquiries under the Freedom of Information Act. I give my consent.

(Signature)

[Redacted Signature]

(Date)

1/26/2009

(c) If this charge is being filed by an INS officer:

I affirm that, to the best of my knowledge, the information provided on this form is true. I understand that the Office of Special Counsel may find it necessary to reveal my identity during the conduct of the investigation of this charge, during a hearing or other proceeding as a result of this charge, or in limited circumstances in response to inquiries under the Freedom of Information Act. I give my consent.

(Signature of INS Officer)

(Date)

**Charge Form for Unfair Immigration-Related
Employment Practices Instructions**
Filed by [REDACTED]

9. Describe the Unfair Employment Practices:

On August 5, 2008, I was offered a teaching position at Glendale Community College, 6000 West Olive Avenue, Glendale, Arizona 85302 by the evening class coordinator the Mathematics Department, [REDACTED]

On August 5th, 2008 I went to the Human resources office to fill out the necessary paperwork for employment at GCC. At the HR office I was given Form I-9 to be completed and I presented my California drivers license and social security card to comply with the Form I-9 requirements. I then completely filled the Form I-9, signed it and returned it to the HR assistant. I was then given a packet which contained several forms such as the federal form W-4 for withholding taxed. I was asked to fill the forms and return them to HR assistant. I then filled out the forms with relevant information and returned it to the HR assistant.

I was then given another form "NON U.S. CITIZEN EMPLOYEE TAX DATA FORM" a copy for which is attached. After I read through the form, I realized that I was not required to provide the information. I told this to the HR assistant and the HR assistant after discussing this with his senior said that since I had not marked the US Citizen on the Form I-9, I would be required to complete and submit the Non- U.S. Citizen Employee Tax Data Form.

I filled the form to the best of my knowledge and returned it to the HR assistant. I was then asked to provide my USA Permanent Resident Card as per the requirement of this form. I told the HR assistant I did not have the Permanent Resident card with me. Since I had never signed such a form in my previous employments, I questioned the HR assistant about the authenticity of the form. I was then told by two other senior HR assistants that it was a Federal Form and required by the IRS and the payroll department to process my pay check. Being apprehensive of their answers, I strongly felt that they were leading me into submitting the form without justification.

At that point, I told them that I doubted that the form was a federal form and required by the IRS. I was then told that my employment packet would not be forwarded to the Maricopa Community College District Office unless and until I presented my USA Permanent Resident card. The employment packet was

returned to me except Form I-9. They declined stating that the Form I-9 was a federal form and a copy could not be provided.

On August 7, 2008, I went to the HR office at Glendale Community College and requested that they provide me with the IRS form number for the "NON US CITIZEN EMPLOYEE TAX DATA FORM" which they claimed was an IRS form. At this point they called some person from the international student office to look at the form and answer my questions. This person looked at it and concluded that the form was a MCC internal form required by the payroll office from USA Permanent Residents and other Non US Citizens. They still insisted that the form be completed and that I submit my USA Permanent Resident card with it because I had not selected the US Citizen box on Form I-9. I again explained to them that in my opinion they were not in compliance of USCIS requirements. I was then instructed to meet the payroll manager. On meeting with the payroll manager, I explained that the requirements to submit my Permanent Resident card is in my opinion in violation of USCIS compliance requirements as I had met all the requirements of Form I-9.

The payroll manager's final decision was that my payroll application would not be processed if I did not complete the Non-US Citizen Employee Tax Data Form and submit my Permanent Resident card with the form. I was therefore denied the opportunity of gainful employment because of the discriminatory policy of the Maricopa Community College District towards me.

NON-U.S. CITIZEN EMPLOYEE TAX DATA FORM

I. PERSONAL INFORMATION

Last Name	First Name	M.I.	U.S. Social Security Number
-----------	------------	------	-----------------------------

II. DETERMINATION OF RESIDENCE STATUS FOR FEDERAL TAX WITHHOLDING

TEST 1:	CHECK APPLICABLE LINE: ☐ I am a lawful permanent resident of the United States (Carrier of either a 'Green Card' or I-551 passport stamp). ☐ I am a immigrant or refugee seeking asylum in the United States. ☐ I am a lawful temporary resident of the United States (Carrier of either Form I-688, or I-688A) IF ANY LINE WAS CHECKED, YOU ARE A <u>RESIDENT ALIEN</u> FOR TAX PURPOSES; SKIP TESTS 2, 3, AND 4, AND CHECK THE RESIDENT ALIEN LINE IN "TEST RESULTS" SECTION BELOW. IF NO LINE WAS CHECKED, YOU MUST GO TO TEST 2 AND CONTINUE COMPLETING THE TESTS.																				
TEST 2:	CHECK APPLICABLE LINE: ☐ I am a teacher, trainee, or researcher on a J-1 visa and have been in the USA for less than two of the preceding six years. ☐ I am a student on an F-1 visa or J-1 visa and have been in the USA for five or fewer years. ☐ I am a student on an F-1 or J-1 visa and have been in the USA for more than five years and I have established with the IRS that I do not plan to reside in the USA when my education is completed. Attach proof from the IRS. IF ANY LINE WAS CHECKED, YOU ARE A <u>NONRESIDENT ALIEN</u> FOR TAX PURPOSES; SKIP TESTS 3 & 4, AND CHECK THE NONRESIDENT ALIEN LINE IN "TEST RESULTS" SECTION BELOW. IF NO LINE WAS CHECKED, YOU MUST GO TO TEST 3 AND CONTINUE COMPLETING THE TESTS.																				
TEST 3:	COMPLETE THE SPACES BELOW, INDICATING THE NUMBER OF DAYS PRESENT IN THE USA DURING THE YEARS LISTED. DO NOT COUNT ANY DAYS DURING YOUR FIRST FIVE YEARS IN THE USA ON WHICH YOU WERE ON A F-1 OR J-1 VISA OR ON A J-1 TEACHER/RESEARCHER VISA. <table><thead><tr><th></th><th>YEAR</th><th>NUMBER OF DAYS PRESENT IN USA</th><th>COMPUTATION FOR TEST</th></tr></thead><tbody><tr><td>CURRENT YEAR</td><td>_____</td><td>_____</td><td>x 1 = _____</td></tr><tr><td>LAST YEAR</td><td>_____</td><td>_____</td><td>x 1/3 = + _____</td></tr><tr><td>TWO YEARS AGO</td><td>_____</td><td>_____</td><td>x 1/6 = + _____</td></tr><tr><td colspan="3"></td><td>TOTAL _____</td></tr></tbody></table> IF TOTAL IS LESS THAN 183, YOU ARE A NONRESIDENT ALIEN FOR TAX PURPOSES. SKIP TEST 4, AND CHECK THE NONRESIDENT ALIEN LINE IN THE "TEST RESULTS" SECTION BELOW. IF THE TOTAL IS GREATER THAN OR EQUAL TO 183, COMPLETE TEST 4 BELOW.		YEAR	NUMBER OF DAYS PRESENT IN USA	COMPUTATION FOR TEST	CURRENT YEAR	_____	_____	x 1 = _____	LAST YEAR	_____	_____	x 1/3 = + _____	TWO YEARS AGO	_____	_____	x 1/6 = + _____				TOTAL _____
	YEAR	NUMBER OF DAYS PRESENT IN USA	COMPUTATION FOR TEST																		
CURRENT YEAR	_____	_____	x 1 = _____																		
LAST YEAR	_____	_____	x 1/3 = + _____																		
TWO YEARS AGO	_____	_____	x 1/6 = + _____																		
			TOTAL _____																		
TEST 4:	CHECK APPLICABLE LINE: Have you been or do you plan to be in the USA for less than 183 days this calendar year, and do you pay taxes in your country, and do you have a closer connection to that country than to the USA (filed FORM 8840, Closer Connection Exception Statement, with the IRS)? ☐ YES. YOU ARE A <u>NONRESIDENT ALIEN</u> FOR TAX PURPOSES. CHECK THE LINE IN "TEST RESULTS" SECTION BELOW. ☐ NO. YOU ARE A <u>RESIDENT ALIEN</u> FOR TAX PURPOSES. CHECK THE LINE IN "TEST RESULTS" SECTION BELOW.																				
TEST RESULTS	CHECK APPROPRIATE FEDERAL TAX WITHHOLDING STATUS. (YOU MUST CHECK ONE OF THESE LINES) ☐ <u>RESIDENT ALIEN</u> YOU MUST COMPLETE SECTIONS III AND IV. ☐ <u>NONRESIDENT ALIEN</u> YOU MUST COMPLETE THE REMAINDER OF THE NON-U.S. CITIZEN TAX PACKET.																				

III. IMMIGRATION & ALIEN TAX INFORMATION

A. CURRENT INS classification [Check appropriate box] ☐ F-1 Student ☐ J-1 Student ☐ J-1 Exchange Visitor ☐ Refugee ☐ Asylee ☐ Permanent Resident ☐ Other. Please specify _____			B. Country of Citizenship C. Country of Residence (for tax purposes)
D. Date of first U.S. entry.	E. INS classification held during first U.S. entry.	F. Expiration date of your current INS classification.	G. Your anticipated date of departure from the United States.
J. Are you claiming tax treaty exemption ? ☐ YES ☐ NO IMPORTANT: If you wish to claim exemption from U.S. Federal income taxes because your country of permanent residence has a tax treaty with the United States, you MUST attach IRS form 8233 (Exemption from Withholding for Compensation on Independent Personal Services of a Non-Resident Alien Individual). Copies are available from either Payroll or the IRS, and must be submitted each tax year.			

IV. EMPLOYEE CERTIFICATION

I certify that the information entered above is correct. If a reduced rate of tax or exemption from tax applies, I further certify that I have complied with all requirements to qualify for the reduced rate of tax or exemption from tax.

Signature: _____

Date: _____

REQUIRED DOCUMENTS

For the following:	Please attach photocopies of these DOCUMENTS
Alien Claiming Residency in U.S.	VISA, I-94 (front and back), copy of Social Security Card, Work Authorization Card I-688, or I-688a, I-688b or I-766.
Permanent Resident	Resident Alien "Green Card" or 1-551, and copy of social security card.
Permanent Resident Applicant	A valid (unexpired) Employment Authorization Card and Letter from INS stating that your Permanent Residency application has been processed <u>or</u> Stamp on passport indicating "Processed for 1-551", copy of social security card.
F-1 Student	F-1 Visa, I-94 Departure Record card, copy of social security card and I-20 Form, Certificate of Eligibility....(F-1) Status * If student is on "Optional" Practical Training, also attach a valid Employment Authorization Card indicating "Practical Training"
J-1 Student	J-1 Visa, I-94 Departure Record card and DS2019 Form, copy of social security card, Certificate of Eligibility...(J-1 Status) Letter from J-1 Responsible Officer authorizing employment

Attachment B



U.S. Department of Justice

Civil Rights Division

*Office of Special Counsel for Immigration Related
Unfair Employment Practices - NYA
950 Pennsylvania Avenue, NW
Washington, DC 20530*

May 29, 2009

BY CERTIFIED MAIL



Re: Discrimination Charge Filed Against Maricopa Community Colleges
Charge Number 197-8-209

Dear Mr. [REDACTED]:

This letter is to inform you of the status of our investigation concerning your discrimination charge. The Office of Special Counsel has not yet determined whether there is reasonable cause to believe the charge is true or whether to file a complaint before an administrative law judge based on the charge. Therefore, we are continuing our investigation.

You may now file your own complaint with an administrative law judge at the Office of the Chief Administrative Hearing Officer (OCAHO). If you do so, you must file the complaint within 90 days of your receipt of this letter. During this additional 90-day period, the Office of Special Counsel may also file a complaint with OCAHO or seek to intervene in any proceedings that may result from your complaint.

If you wish to file a complaint, you must do so with the:

Office of the Chief Administrative Hearing Officer
5107 Leesburg Pike, Suite 2519
Falls Church, Virginia 22041

For more information, including specific filing requirements, you may contact that office at 703-305-0872 or 703-305-0864, or www.usdoj.gov/eoir/OcahoMain/Howtofilea274Bcomplaint.htm. We have enclosed a copy of the federal regulations that apply to the filing of complaints and related proceedings before OCAHO. Please note that your complaint must be in writing and in English.

The filing of a complaint with the OCAHO is similar to filing a private lawsuit, and requires that you present your allegations to an administrative law judge through written papers

and/or oral testimony. Before filing your own complaint, you may wish to consider contacting a private attorney, at your own expense.

Please note that your charge has been referred to the Equal Employment Opportunity Commission (EEOC) in order for that office to investigate it under Title VII of the Civil Rights Act of 1964, which – among other things – prohibits national origin discrimination by employers with more than 14 employees. You may contact the EEOC at:

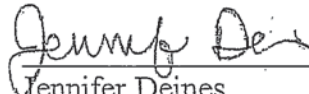
Phoenix District Office
3300 N. Central Avenue Suite 690
Phoenix, Arizona 85012-2504

If you have any questions regarding this matter, please do not hesitate to contact the undersigned attorney at 1-800-255-7688 (toll free) or directly at (202) 353-9338. Thank you for your cooperation during the investigation of this charge.

Sincerely,

Katherine A. Baldwin
Deputy Special Counsel

By:


Jennifer Deines
Trial Attorney

Enclosure

cc: Office of the Chief Administrative Hearing Officer (w/o encl.)
Equal Employment Opportunity Commission

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

DJ# 197-8-209

COMPLETE THIS SECTION ON DELIVERY

A. ☒ Agent
☐ Addressee

B. Received by (Printed Name) [Redacted]

C. Date of Delivery 6/5/09

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

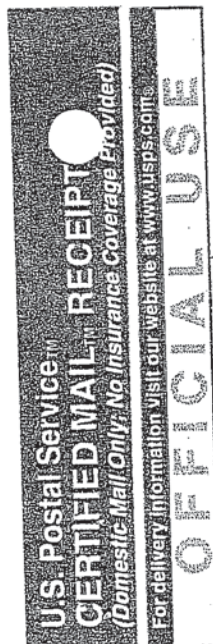
Article Number 7003 3110 0004 0903 9697

(Transfer from service label)

US Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540



Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	

Postmark Here

DJ# 197-8-209

Zainul Singaporewalla



Attachment C

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until October 4, 2009. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before October 4, 2009.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before October 4, 2009, is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By: Jennifer Deines

Date: 7/30/09

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By: Richard Galván

Date: 7/30/09

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

Attachment D

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until December 4, 2009. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before December 4, 2009.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before December 4, 2009, is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By: Jennifer Deines

Date: 9/21/09

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By: Richard Galván

Date: 9/21/09

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

Attachment E

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until March 4, 2010. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before March 4, 2010.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before March 4, 2010, is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By: Jennifer Deines

Date: 11/4/09

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By: Richard Galván

Date: 11/3/09

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

Attachment F

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until May 4, 2010. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before May 4, 2010.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before May 4, 2010, is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By:

Jenny Deines

Date: 2/18/10

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By:

Richard Galván

Date: 2/18/10

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

Attachment G

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until June 15, 2010. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before June 15, 2010.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before June 15, 2010, is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By: Jennifer Deines

Date: 4/13/2010

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By: Richard Galván

Date: 4/13/10

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

Attachment H

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until July 15, 2010. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before July 15, 2010.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before July 15, 2010, is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By: Jennifer Deines

Date: 6/3/10

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By: Richard Galván

Date: 6/3/10

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

Attachment I

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, on July 30, 2009, the parties reached an agreement that extended the United States' complaint filing period until October 4, 2009, and subsequent complaint filing extension agreements were executed on September 21, 2009, November 4, 2009, February 18, 2010, April 13, 2010, and June 3, 2010. The complaint filing extension agreement executed on June 3, 2010 extends the complaint filing period until July 15, 2010.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until August 16, 2010. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before August 16, 2010.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before August 16, 2010 is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By: Jennifer Deines

Date: 6/30/10

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By: Richard Galván

Date: 6/23/10

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

Attachment J

**STIPULATION TO EXTEND CHARGE INVESTIGATION PERIOD AND
TO ESTABLISH COMPLAINT FILING DEADLINE**

WHEREAS, the Office of Special Counsel for Immigration Related Unfair Employment Practices ("OSC") is currently investigating charge number 197-8-209, filed by [REDACTED] ("Charging Party") alleging that Maricopa Community Colleges ("Respondent") engaged in activity prohibited by 8 U.S.C. § 1324b.

WHEREAS, 8 U.S.C. §1324b(d)(1) provides an initial 120-day period from the date OSC receives a complete charge of discrimination for OSC to investigate the charge, determine whether there is reasonable cause to believe the charge is true, and decide whether to file a complaint with an administrative law judge with the Office of the Chief Administrative Hearing Officer ("OCAHO").

WHEREAS, 8 U.S.C. §1324b(d)(2) provides that if OSC has not filed a complaint with an OCAHO administrative law judge within the initial 120-day charge investigation time period, OSC shall notify the Charging Party of OSC's determination not to file a complaint during that 120-day period, and that the Charging Party may file a complaint directly with an OCAHO administrative law judge within 90 days following the Charging Party's receipt of the notice.

WHEREAS, the Charging Party received such notice from OSC regarding the above-referenced charge on June 5, 2009. The Charging Party's complaint filing deadline is therefore September 4, 2009.

WHEREAS, on July 30, 2009, the parties reached an agreement that extended the United States' complaint filing period until October 4, 2009, and subsequent complaint filing extension agreements were executed on September 21, 2009, November 4, 2009, February 18, 2010, April 13, 2010, June 3, 2010, and June 30, 2010. The complaint filing extension agreement executed on June 30, 2010 extends the complaint filing period until August 16, 2010.

WHEREAS, OSC and the Respondent agree that extending the charge investigation time period identified and described in the preceding paragraphs will increase judicial efficiency by allowing additional time to resolve the charge.

NOW, THEREFORE, OSC and the Respondent stipulate and agree to extend the charge investigation time period identified and discussed above until August 30, 2010. Consequently, OSC and the Respondent agree that OSC may file a complaint with an OCAHO administrative law judge on or before August 30, 2010.

OSC and the Respondent agree that this stipulation to extend the charge investigation time period and to establish a complaint filing deadline does not result in any harm or prejudice to the Respondent. In addition, the Respondent will not assert that any complaint filed on or before August 30, 2010 is untimely.

This Stipulation may be executed in multiple counterparts, each of which together shall be considered an original but all of which shall constitute one agreement. OSC and the Respondent agree to be bound by facsimile signatures.

By: Jennifer Deines

Date: 8/16/10

Jennifer Deines
Trial Attorney
Office of Special Counsel for Immigration
Related Unfair Employment Practices

Maricopa Community Colleges

By: Richard Galván

Date: 8/13/10

Richard Galván
Assistant General Counsel
Maricopa Community Colleges

**Statement Pursuant To
28 C.F.R. §§ 68.3, 68.7(b)(5)**

UNITED STATES OF AMERICA,

COMPLAINANT,

v.

MARICOPA COUNTY COMMUNITY
COLLEGE DISTRICT D/B/A
MARICOPA COMMUNITY
COLLEGES,

RESPONDENT.

OCAHO CASE NO. _____

Counsel for Complainant, United States of America

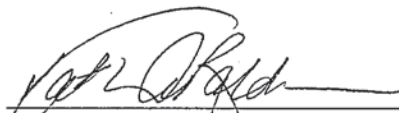
Richard Galván, Esq.
Assistant General Counsel
Maricopa County Community College District
Office of General Counsel
2411 West 14th Street
Tempe, AZ 85281
Telephone: (480) 731-8875
Facsimile: (480) 731-8890

Counsel for Respondent, Maricopa County Community College District

Respectfully submitted,

THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division

By:



KATHERINE A. BALDWIN
Deputy Special Counsel
Office of Special Counsel for Immigration-Related
Unfair Employment Practices



ELIZABETH I. HACK
Special Litigation Counsel
Office of Special Counsel for Immigration-Related
Unfair Employment Practices



JENNIFER DEINES
RONALD LEE
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Office of Special Counsel for Immigration-Related
Unfair Employment Practices

950 Pennsylvania Ave., N.W.
Washington, DC 20530
Telephone: (202) 616-5594
Facsimile: (202) 616-5509

Dated: August 30, 2010