

RESOLUTION NO. R02-04 CMS

A RESOLUTION AUTHORIZING AND DIRECTING THE CITY SOLICITOR TO REPRESENT THE CITY OF OBERLIN IN REGARD TO A COMPLAINT OF DISCRIMINATION PRESENTLY PENDING BEFORE THE UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION AND DECLARING AN EMERGENCY

BE IT RESOLVED by the Council of the City of Oberlin, County of Lorain, State of Ohio, five-sevenths (5/7ths) of all members elected thereto concurring:

SECTION 1. That the City Solicitor is hereby authorized and directed to represent the City of Oberlin in a discrimination complaint presently pending before the United States Equal Employment Opportunity Commission, filed by Norman T. Yancey, and being Charge No. 220A200487, and to conduct any and all investigations, discovery and other proceedings in said matter as he deems appropriate, all to be charged as extraordinary expense to the City.

SECTION 2. It is hereby found and determined that all formal actions of this Council concerning or relating to the adoption of this Resolution were adopted in an open meeting of this Council and that all deliberations of this Council and any of its committees that resulted in such formal action were in meetings open to the public, in compliance with all legal requirements including Section 121.22 of the Ohio Revised Code.

SECTION 3. That this Resolution is hereby declared to be an emergency measure necessary for the preservation of the public peace, health and safety of the citizens of the City of Oberlin, Ohio, to wit:

"to provide for the immediate defense of a pending complaint"
and shall take effect immediately upon passage.

PASSED: 1st Reading - February 4, 2002 (E)

ATTEST:


CLERK OF COUNCIL


CHAIR OF COUNCIL

POSTED:

EFFECTIVE DATE:

City of
Oberlin

85 South Main Street, Oberlin, Ohio 44074
(440) 775-1531

February 15, 2002

To: City Council
From: Robert DiSpirito, City Manager *RGD*
Re: ADA Complaint

Please find attached a copy of the complaint that OMLPS received yesterday from Norm Yancey. The complaint cites an alleged violation of the Americans with Disabilities Act (ADA). No specific remedy is clearly mentioned. Mr. Yancey has now qualified for the medical disability retirement that he sought through the State of Ohio, and the comparable position at OMLPS that the City formally offered him several months ago is still open. Marshall Whitehead, our designated EEO/ADA Coordinator, has been informed of this matter.

Resolution No. R02-04, a copy of which is in this packet, has been added for your agenda Tuesday evening. It would authorize the City Solicitor to represent the City with regards to this complaint.

If you have any questions, please let me know.

cc: Eric Severs, City Solicitor
Sal Talarico, City Auditor
Steve Dupee, Director of OMLPS

"Ohio's Best College Town"

—OHIO Magazine



OBERLIN MUNICIPAL LIGHT AND POWER SYSTEM ♦ 289 SOUTH PROFESSOR STREET ♦ OBERLIN, OHIO 44074

Phone (440)775-7260

Fax (440)775-1546

MEMORANDUM

To: Rob DiSpirito, City Manager
Re: EEO Charge of Discrimination
From: Steve Dupee, Director
Date: February 14, 2002

A handwritten signature in black ink, appearing to be "S.D.", is written over the "Re:" and "From:" lines of the memorandum.

Attached is a notice of charge of discrimination by Norman Yancey received today.

/sd

c: Eric Severs, City Solicitor

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Director Of Human Resources
Oberlin Municipal Light & Power
289 S. Professor Street
Oberlin, OH 44074

PERSON FILING CHARGE

Yancey, Norman T

THIS PERSON (check one)

- CLAIMS TO BE AGGRIEVED
 IS FILING ON BEHALF OF ANOTHER

DATE OF ALLEGED VIOLATION

Earliest 05/17/2001 *Most Recent* 06/26/2001

PLACE OF ALLEGED VIOLATION

Oberlin, OH

CHARGE NUMBER

220A200487

NOTICE OF CHARGE OF DISCRIMINATION

(See EEOC "Rules and Regulations" before completing this Form)

You are hereby notified that a charge of employment discrimination has been filed against your organization under:

- TITLE VII OF THE CIVIL RIGHTS ACT OF 1964
 THE AGE DISCRIMINATION IN EMPLOYMENT ACT OF 1967
 THE AMERICANS WITH DISABILITIES ACT
 THE EQUAL PAY ACT (29 U.S.C. SECT. 206(d)) investigation will be conducted concurrently with our investigation of this charge.

The boxes checked below apply to your organization:

1. No action is required on your part at this time.
2. Please submit by 03/11/02 a statement of your position with respect to the allegation(s) contained in this charge, with copies of any supporting documentation. This material will be made a part of the file and will be considered at the time that we investigate this charge. Your prompt response to this request will make it easier to conduct and conclude our investigation of this charge.
3. Please respond fully by _____ to the attached request for information which pertains to the allegations contained in this charge. Such information will be made a part of the file and will be considered by the Commission during the course of its investigation of the charge.

For further inquiry on this matter, please use the charge number shown above. Your position statement, your response to our request for information, or any inquiry you may have should be directed to:

Equal Employment Opportunity Comm
1660 W 2nd St, Skylight Tower, #850
Cleveland, OH 44113-1412

Marlene E. Perkins, Cart Supervisor
(Commission Representative)
(216) 522-2001
(Telephone Number)

Enclosure: Copy of Charge

BASIS OF DISCRIMINATION

- RACE COLOR SEX RELIGION NAT. ORIGIN AGE DISABILITY RETALIATION OTHER

CIRCUMSTANCES OF ALLEGED VIOLATION

See enclosed Form 5, Charge of Discrimination.

DATE 02/11/2002	TYPED NAME/TITLE OF AUTHORIZED EEOC OFFICIAL Michael C. Fetzer Director	SIGNATURE <i>MCF/SES</i>
--------------------	---	-----------------------------

CHARGE OF DISCRIMINATION

AGENCY

CHARGE NUMBER

 FEPA
 EEOC

220A200487

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

The Ohio Civil Rights Commission

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

HOME TELEPHONE (Include Area Code)

Mr. Norman T. Yancey

(440) 282-5846

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

5846 Province Court, Lorain, OH 44053

02/14/1952

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME NUMBER OF EMPLOYEES, MEMBERS TELEPHONE (Include Area Code)

Oberlin Municipal Light & Power

Cat A (15-100)

(440) 775-7260

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

289 S. Professor Street, Oberlin, OH 44074

093

NAME TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

 DATE DISCRIMINATION TOOK PLACE
Earliest Latest
 RACE COLOR SEX RELIGION NATIONAL ORIGIN
 RETALIATION AGE DISABILITY OTHER (Specify)

05/17/2001 06/26/2001

 CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)).

I began working for Respondent on August 20, 1985, most recently as a Journeyman Lineman.

I am a qualified individual with a disability.

My employment with the City of Oberlin was terminated when all my paid leave expired on May 17, 2001.

In a letter dated June 26, 2001 signed by Steve Dupree, Director, he informed me that my medical condition would put my health and the safety of my coworkers and the public at risk.

I believe I have been discriminated against because of my disability, in violation of Title I of The Americans With Disabilities Act of 1990.

 EEOC
 CART UNIT

FEB 04 2002

RECEIVED

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

Norman T. Yancey
 Date _____ Charging Party (Signature)

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
 (Month, day and year)

REQUEST FOR INFORMATION

Charging Party: Yancey, Norman T.
Respondent: Oberlin Municipal Light & Power
Charge No.:

DISCHARGE:

1. Submit a written position statement on each of the allegations of the charge, accompanied by documentary evidence and/or written statements, where appropriate. Also include any additional information and explanation you deem relevant to the charge.
2. Submit copies of all written rules, policies and procedures relating to the issue(s) raised in the charge, including what criteria was used in determining which employees would be eliminated. If such does not exist in written form, explain the rules, policies, and procedures.
3. If the Charging Party was discharged, submit the following:
 - a. date of discharge,
 - b. reason for discharge,
 - c. a statement of whether the Charging Party had any right of appeal, and whether he made use of any appeal rights,
 - d. person recommending the discharge, including name and position held.
 - e. person making final decision to discharge the Charging Party, including name and position held.
 - f. copies of all pertinent documents in the Charging Party's personnel file relating to the subject discharge.

Attach a copy of any evaluation or investigation report relating to the discharge
4. Explain your discharge procedures in effect at the time of the alleged violation. If the procedures are in writing, submit a copy.
5. Submit copies of all written rules relating to employee duties and conduct. Explain how employees learn the contents and rules.
6. List all employees who committed the same and/or substantially similar offense(s) that the Charging Party committed, and the disciplinary action taken against them. Supply backup documentation for the employees listed, including name and position title
7. List all employees discharged within the relevant period January 1, 2001 through the present. For each employee, include the employee's name, position title, reason for and date of discharge, and a copy of the separation notice.

IT MAY BE POSSIBLE TO RESOLVE THIS CHARGE *BEFORE* YOU SUBMIT THE POSITION STATEMENT OR OTHER INFORMATION WE HAVE REQUESTED.

If you are interested in *exploring settlement* or *other early resolution of the charge*, please contact us as soon as possible. Free, voluntary mediation is available and is highly recommended for resolving a charge in a manner acceptable to both the charging party and the employer. *A brochure on our highly successful mediation program is enclosed for your information.* If you are interested in trying to resolve the enclosed charge as soon as possible or want more information about voluntary mediation please contact our Alternative Dispute Resolution Coordinator at 216-522-7678.

HOWEVER, IF YOU ELECT AGAINST MEDIATION OR OTHER EARLY RESOLUTION OF THE CHARGE, YOU MUST PROVIDE THE POSITION STATEMENT OR OTHER INFORMATION WE HAVE REQUESTED BY THE DATE REQUESTED ON THE ENCLOSED FORM 131.

The position statement is your opportunity to provide your response to the charge. If you dispute the charge allegations, your position statement must:

- provide a specific response to all charge allegations, with specific detail to your reasons and facts supporting your position;
- describe all witnesses, records or other materials relevant to the charge allegations which support the representations made in your position statement; and
- be accompanied by copies of the records or documents you identify in the statement.

FOR THOSE CHARGES ALLEGING SEXUAL, RACIAL, OR OTHER UNLAWFUL HARASSMENT:

If you contend that the employer .

- took reasonable care to prevent the harassment and/or
- took appropriate corrective action when confronted with harassment conduct or allegations

..your position statement must:

- describe in detail all your reasonable care efforts, including the dates and manner the reasonable care actions were implemented;
- describe the specific steps taken to investigate and remedy the harassment, including the dates investigation was commenced and completed;
- be accompanied by copies of all interview notes/statements prepared or obtained during the internal investigation, a copy of the final report and description of the disposition of the matter, and copies of all counseling/disciplinary notices which may have resulted;
- include a copy of the employer's anti-harassment policy, including a description of the date the policy was implemented and information about the dates, manner and places the policy was posted/otherwise disseminated to staff.

Failure to provide this requested information with the position statement may be interpreted to mean that the material does not exist or that the employer refuses to disclose it to EEOC

Thank you for your cooperation. EEOC Cleveland District Office

Can a small business resolve a charge without an investigation?

Yes! EEOC has a free mediation program. The program is voluntary at all stages of the process. Neutral mediators provide employers and charging parties the opportunity to reach mutually agreeable solutions, while making efficient use of their time and money.

In the event that mediation does not result in a settlement, the charge is referred for investigation. Information disclosed by the parties during the mediation will not be used as a part of EEOC's investigation. Moreover, mediators are bound by confidentiality provisions and may not provide information about the mediation to EEOC investigative staff.

How does EEOC investigate allegations of employment discrimination?

An EEOC investigator asks the employer to respond to the allegations in the charge and provide documentation to substantiate its response. EEOC usually asks for a written answer; however, on-site visits may occur to conduct document reviews and interviews. Although it is not usually necessary, if an employer does not provide the requested information or access, the EEOC may issue a subpoena for access, documents, or testimony. As soon as practical after we receive the position statement and gathering evidence from the employer, EEOC will determine whether to investigate further, propose settlement or dismiss the charge.

What are an individual's rights once the charge has been dismissed?

If EEOC decides that there is insufficient evidence to conclude that a violation exists, the investigator explains the rationale for the decision to the charging party. He or she is given a dismissal notice which includes the right to file a lawsuit in federal court. The statutes EEOC enforces give a charging party the right to proceed in court within

90 days of receiving their dismissal notice. The laws also permit the charging party to choose to proceed to federal court instead of waiting for the EEOC to complete its investigation. In some cases, EEOC may issue a notice of right to sue upon the charging party's request.

What does the EEOC do if it determines that a violation has occurred?

If EEOC decides that there is reasonable cause to believe that discrimination occurred, the investigator explains the rationale to the employer. This is followed by a written determination and invitation to enter into conciliation discussions. The purpose of these discussions is to eliminate the discrimination and provide relief to the charging party and others, if appropriate, without going to court. Negotiations will continue for a reasonable period until the case is resolved or conciliation fails. Conciliation agreements are ordinarily signed by the charging party, the employer, and the EEOC office director.

Under what circumstances will EEOC pursue a charge in federal court?

If the conciliation efforts fail, EEOC will determine if it will sue a private employer or recommend litigation to the Department of Justice for state and local government employers. If EEOC decides against litigation, the charging party will be given his or her right to file a lawsuit in federal court.



For more small business information, please refer to EEOC's website at www.eeoc.gov or contact the nearest EEOC field office in your area by calling 1-800-669-4000 (voice) or 1-800-669-6820 (TTY)

Publication # EEOC-FS-E13

Can a small business resolve a charge without an investigation?

Yes! EEOC has a free mediation program. The program is voluntary at all stages of the process. Neutral mediators provide employers and charging parties the opportunity to reach mutually agreeable solutions, while making efficient use of their time and money.

In the event that mediation does not result in a settlement, the charge is referred for investigation. Information disclosed by the parties during the mediation will not be used as a part of EEOC's investigation. Moreover, mediators are bound by confidentiality provisions and may not provide information about the mediation to EEOC investigative staff.

How does EEOC investigate allegations of employment discrimination?

An EEOC investigator asks the employer to respond to the allegations in the charge and provide documentation to substantiate its response. EEOC usually asks for a written answer; however, on-site visits may occur to conduct document reviews and interviews. Although it is not usually necessary, if an employer does not provide the requested information or access, the EEOC may issue a subpoena for access, documents, or testimony. As soon as practical after we receive the position statement and gathering evidence from the employer, EEOC will determine whether to investigate further, propose settlement or dismiss the charge.

What are an individual's rights once the charge has been dismissed?

If EEOC decides that there is insufficient evidence to conclude that a violation exists, the investigator explains the rationale for the decision to the charging party. He or she is given a dismissal notice which includes the right to file a lawsuit in federal court. The statutes EEOC enforces give a charging party the right to proceed in court within

90 days of receiving their dismissal notice. The laws also permit the charging party to choose to proceed to federal court instead of waiting for the EEOC to complete its investigation. In some cases, EEOC may issue a notice of right to sue upon the charging party's request.

What does the EEOC do if it determines that a violation has occurred?

If EEOC decides that there is reasonable cause to believe that discrimination occurred, the investigator explains the rationale to the employer. This is followed by a written determination and invitation to enter into conciliation discussions. The purpose of these discussions is to eliminate the discrimination and provide relief to the charging party and others, if appropriate, without going to court. Negotiations will continue for a reasonable period until the case is resolved or conciliation fails. Conciliation agreements are ordinarily signed by the charging party, the employer, and the EEOC office director.

Under what circumstances will EEOC pursue a charge in federal court?

If the conciliation efforts fail, EEOC will determine if it will sue a private employer or recommend litigation to the Department of Justice for state and local government employers. If EEOC decides against litigation, the charging party will be given his or her right to file a lawsuit in federal court.



For more small business information, please refer to EEOC's website at www.eeoc.gov or contact the nearest EEOC field office in your area by calling 1-800-669-4000 (voice) or 1-800-669-6820 (TTY)

Publication # EEOC-FS-E13

MEDIATION



FACTS ABOUT MEDIATION

Mediation is a form of Alternative Dispute Resolution (ADR) that is offered by the U.S. Equal Employment Opportunity Commission (EEOC) as an alternative to the traditional investigative or litigation process. Mediation is an informal process in which a neutral third party helps the opposing parties reach a voluntary, negotiated resolution of a charge of discrimination. The decision to mediate is completely voluntary for the charging party and the employer. Mediation gives the parties the opportunity to discuss the issues raised in the charge, clear up misunderstandings, determine the underlying interests or concerns, find areas of agreement and, ultimately, incorporate those areas of agreement into solutions. A mediator does not resolve the charge or impose a decision on the parties. Instead, the mediator helps the parties to agree on a mutually acceptable resolution. The mediation process is strictly confidential. Information disclosed during mediation will not be revealed to anyone, including other EEOC employees.

HOW DOES MEDIATION WORK?

An EEOC representative will contact the charging party and employer concerning their participation in the program. If both parties agree, a mediation session conducted by a trained and experienced mediator is scheduled. While it is not necessary to have an attorney or other representation in order to participate in EEOC's mediation program, either party may choose to do so. It is important that persons attending the mediation session have the authority to resolve the dispute. If mediation is unsuccessful, the charge is investigated like any other charge. Information disclosed during mediation will not be revealed to anyone... including other EEOC employees.

ADVANTAGES OF MEDIATION

- Mediation is an efficient process that saves time and money. Successful mediation avoids a time consuming investigation and achieves a prompt resolution of the charge. The majority of mediations are completed in one session, which usually lasts from one to five hours.
- Mediation is fair. Mediators are neutral third parties who have no interest in the outcome. Their role is to help the parties resolve the charge.
- Mediation is a confidential process. The sessions are not tape-recorded or transcribed. Notes taken during the mediation are discarded.
- Settlement agreements secured during mediation do not constitute an admission by the employer of any violation of the laws enforced by EEOC.
- Mediation avoids lengthy and unnecessary litigation.

For additional information about the mediation program at EEOC, you may contact EEOC's web page at <http://www.eeoc.gov> or the EEOC field office nearest you by calling our toll free numbers 1-800-669-4000 (Voice) or 1-800-669-6820 (TTY).

Employers Can Reap Benefits by Seeking Mediation Before the EEOC

It is rare indeed for any attorney representing exclusively employers to be able to positively recommend any program by one of our government's employment agencies. But the Mediation Program

utilized by the Equal Employment Opportunity Commission is an exception. We see the following four basic advantages for employers in utilizing the Mediation Program instead of responding to the charge in the more traditional manner:

- Lower costs
- Speedier Resolution
- Involvement of Mediators
- Finality

The cost of investigating and responding to a discrimination charge through traditional EEOC investigative procedures can be quite expensive, particularly for employers without Human Resource departments or in-house labor counsel. If an employer engages outside counsel, which we recommend in dealing with any governmental agency investigation, approximately 10 to 20 hours of legal time must be spent to investigate the allegations of the charge by interviewing witnesses, reviewing comparable data, and then drafting a detailed position statement for consideration by the EEOC investigator. Frequently, investigators request follow-up information or personal interviews, which would also result in more legal time. Although this may be a lucrative case for the outside counsel, it is extremely costly at \$150 to \$250 per hour for an employer.

When you compare the cost of going through the investigative procedures to mediation, the value to employers is clear. Submitting the charge to the mediation procedure certainly requires investigation by the employer and/or its counsel, but does not require submission of a response. The mediation itself rarely takes more than half a day, since within a relatively short time, it becomes apparent whether the parties legitimately can achieve a resolution or are so far apart that mediation efforts are senseless. The mediation procedure itself encourages the parties to consider creative solutions to the charge.

When dealing with discharge cases, these creative solutions include record rehabilitation, positive or neutral references, continuation of insurance benefits and cash buy-outs. In non-discharge cases, creative solutions include an agreement to provide more training, revising work schedules,

transferring employees to other departments, or preparing a specific performance improvement plan. Such creative solutions can be more easily explored in

the mediation process, since the goal of mediation is a mutually acceptable resolution, compared to the goal of the traditional administrative investigation, which is to determine whether discrimination occurred.

Speedier Resolution

The accumulation of potential back pay and benefit liability for an employer during a pendency of a Charge over a termination can present significant risk to that employer. Mediations are generally scheduled within 45 days of the filing of a charge, before the amount of potential back pay and benefits have built up. This means that a successful mediation can often resolve the case within less than 60 days, much more quickly than an investigation can be concluded.

Involvement of Mediators

Both the internal and external mediators assigned by the EEOC are usually very good. They have been diligent not only in scheduling the mediation to take place, but also in making great efforts to see that the case is resolved at the mediation. The involvement of a neutral, third party to bring some rationality in what often can be an emotional situation has been extremely helpful in resolving these cases. Over 65% of cases that enter the mediation program are resolved in less than 100 days. Most employers are very pleased with the effort, neutrality, experience and knowledge of the mediator involved.

Finality

The final and probably most significant advantage of the mediation program over the traditional administrative investigation process is that a mediated settlement is a final settlement. There is nothing more frustrating to an employer than receiving a federal or state court lawsuit over the allegations set forth in an EEOC Charge, after going through the time and expense of the EEOC's investigative process, which resulted in the EEOC agreeing that the charge is groundless and dismissing the case from agency proceedings. In other words, the employer's "win" is meaningless, since a charging party, after even a formal EEOC dismissal, can simply proceed in federal or state court within the appropriate statute of limitations and litigate the exact same allegations that were found to be groundless by the EEOC, without any *res judicata* effect for the dismissal.

It is for these reasons—the lower cost, the speedier resolution, the involvement of the mediators, and the finality of a mediated settlement—that have led us to recommend proceeding through the EEOC mediation program for most charges that employers face. This is one government program that works and really deserves sincere consideration by any employer faced with a discrimination charge. ◀

James R. Perry
Susan T. Rapp

Abbot, Nicholson, Quilter,
Eshabi & Youngblood, P.C.
Detroit, Michigan



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Cleveland District Office

1660 West Second St., Suite 850
Cleveland, OH 44113-1454
PHE: (216) 522-2601
TDD: (216) 522-8441
FAX: (216) 522-7395

Mediation Notice (Respondent)

Charging Party _____ Charge No. _____

Respondent _____

This charge has been selected as appropriate for mediation. Attached is a Mediation Fact Sheet which describes the mediation option, as well as copies of the Agreement to Mediate and Confidentiality Agreement, both of which will be signed at the mediation. Please keep these copies for your records.

A mediator will contact you shortly to schedule the mediation. Your response to the attached request for information is held in abeyance, pending the outcome of mediation. If an agreement is reached in mediation, the charge will be closed.

If, however, the charge is not resolved in mediation, the charge will return to the regular investigative process. The response to the attached information request would be due within 30 days of the mediation date, and should be sent to Mr. Dan Cabot, Enforcement Supervisor. Mr. Cabot can be reached at (216) 522-2289.

Mediation is voluntary. If you choose not to participate in mediation, you must mail, or fax (216)522-7395, this form within ten (10) days of receipt to:

Loretta J. Feller, ADR Coordinator
Equal Employment Opportunity Commission
1660 West 2nd Street, Suite 850
Cleveland, Ohio 44113

Check here to decline mediation. Please comply with the due date for submission of information as stated on the attached Notice of Charge.

Reason for declining mediation (this information is for program evaluation purposes only, and will be kept confidential):

If you have questions about EEOC mediations after reading the attached material, please call the ADR Hotline at (216) 522-7415.

Please list Respondent contact name and telephone. _____