



## **ANNUAL REPORT**

**Fiscal Year 2022**

December 31, 2022

## **Current HRC Commissioners and their Terms of Appointment**

All appointments are for five-year staggered terms and expire on the last day of February.

Kevin “Coach” Christie, Chair	2018-2023
Nathan Besio	2007-2022 (waiting on reappointment)
Dawn Ellis	2015-2025
Joan Nagy	2019-2024
Bruce Wilson	2022-2027 (starting April 2022) <sup>1</sup>

## **Current HRC Staff**

<b>Name/Position</b>	<b>SOV</b>	<b>Date of Hire</b>
Bor Yang, Executive Director & Legal Counsel	11/30/2015, Appointed ED	11/13/2018
Cassandra Burdyshaw, Staff Attorney Investigator		11/26/2018
Amanda Garcés, Director of Policy, Education and Outreach		12/2/2019
Big Hartman, Staff Attorney Investigator		09/13/2021
Daniel Flynnjac, Staff Attorney Investigator		06/27/2022
Maia Hanron, Executive Staff Assistant		01/9/2023 <sup>2</sup>

## **HRC Contact Information**

Office hours:	7:45 a.m. - 4:30 p.m. Monday - Friday
Telephone number:	(800) 416-2010 (Toll Free Voice Line) (802) 828-2480 or (802) 828-1625 (Voice)
Mailing address:	12 Baldwin Street, Montpelier, VT 05633-6301
E-mail address:	human.rights@vermont.gov
Website:	hrc.vermont.gov

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<sup>1</sup> Commissioner Wilson replaced former Commissioner Donald Vickers.

<sup>2</sup> John McKelvie served as the Executive Staff Assistant throughout FY22 and significantly contributed to this Annual Report before his departure from the HRC in November 2022.

# Vermont Human Rights Commission

## MISSION STATEMENT

The mission of the Vermont Human Rights Commission is to promote full civil and human rights in Vermont. The Commission protects people from unlawful discrimination in housing, state government employment and places of public accommodations.

## STRATEGIES TO ACHIEVE THE MISSION AND VISION

The Commission pursues its mission by:

- Enforcing laws through investigations and litigation
  - Complaints alleging violations of anti-discrimination laws are investigated impartially and decided in a timely manner by the Human Rights Commission.
- Conciliating disputes pre and post investigative reports
  - Complainants and Respondents are offered timely and meaningful access to mediation services or informal means of conciliation that promote mutually satisfactory resolutions to their disputes.
- Educating the public and providing information and referrals
  - HRC staff offer information, referrals, educational programs, and educational training to those who request these services. Additionally, HRC staff requests relief in the form of training in all post-investigative settlements and when appropriate, in pre-investigative settlements. HRC staff engage in coalition and community activities that address the needs of members of protected categories.
- Advancing effective public policies on human rights
  - The HRC provides leadership in public policy development with respect to civil and human rights issues in Vermont and presents testimony to the Legislature on such issues.

## **EXECUTIVE SUMMARY**

The Commission accepted significantly less cases for an investigation due to staff shortage in FY22. But it heard more cases, made more findings, filed more litigation, and Complainants received more monetary relief than in previous years. The Commission was instrumental in getting two incredibly important bills passed. First, correcting the “severe or pervasive” harassment standard in housing. Well-established precedence interpreting the legal standard made it impossible for people who had experienced harassment to get their cases even heard in court, much less prevail. The new standard will capture one-time incidents that create a hostile housing environment and require courts to look at the totality of circumstances when it comes to people who belong in multiple protected classes. Second, the statute of limitations across all anti-discrimination statutes was expanded to six years without conditions. This allowed people to secure safe and affordable housing and employment opportunities before they would have to file a claim. This was an incredible victory for Vermont’s most vulnerable and marginalized populations.

As the Commission becomes a more powerful force for Vermonters, its jurisdiction and authority has also been under attack and subjected to lengthy and time-consuming legal battles, some of which occurred even before the HRC had an opportunity to investigate. But this tension is inevitable. There is a natural tension that occurs when communities are on the precipice of meaningful change. In many ways, the events of the last few years have made us more conscious than ever of the systems and processes that separate us. This raw observation of the world as it actually is, was the impetus for real work and real progress for so many. For others, the same events fueled a deep and relentless opposition. On the surface, it denies any accountability and engages in trainings pro forma. But when pushed, the opposition will assault and harm others to maintain the status quo. And it is backed by resourceful and powerful forces.

It happens to be Martin Luther King Day as I write this executive summary. And I am reminded of the words of a man whose legacy still inspires today. He said, “You can kill the dreamer, but you cannot kill the dream.” We are only here for a short time, but may our work continue to do good in the community long after.

## **RECOMMENDATIONS TO THE LEGISLATURE**

The Commission’s greatest tool for meeting its mission is enforcement of the anti-discrimination laws that fall under its jurisdiction. But this tool is limited by the laws of this state. It is time that the laws reflect the realities, morals and values of the people governed by it. To this end, the HRC makes the following recommendations:

1. The “severe or pervasive” legal standard that Courts use to determine the merits of a harassment/hostile environment case is confusing, inconsistently applied and not reflective of a current societal values. The new standard that was adopted in housing must be expanded to cover workplaces and schools.

2. Protect employees who bring forth claims of discrimination by protecting their jobs and future employment opportunities with the same employer. Prohibit employers from using “don’t darken my door” clauses in settlement agreements.
3. Amend Vermont’s equal pay laws to include race, national origin and disability.

**HRC JURISDICTION**

By its enabling statute, the Human Rights Commission enforces state anti-discrimination/civil rights laws. These include:

- The Vermont Fair Housing Act;
- The Public Accommodations Act including Title 16 of the relevant education harassment laws and the gender neutral bathroom laws that passed in 2018;
- The Vermont Fair Employment Practices Act;<sup>3</sup>
- Conditions for Employment (flexible working arrangements);
- Provisions of the Worker’s Compensation and Parental Family Leave Acts.

Vermont enjoys a much more expansive definition of “places of public accommodations” and as such, it encompasses all government entities, hospitals, prisons, roads, schools, businesses, and any office or establishment that provides goods or services to the general public.

These statutes prohibit individuals or entities from taking adverse action (discriminating) against individuals in protected categories based on their membership in one or more of the protected categories.<sup>4</sup>

<b>Protected Category</b>	<b>Housing</b>	<b>Public Accommodations</b>	<b>State Government Employment</b>
Race	X	X	X
Color	X	X	X
National Origin	X	X	X
Religion	X	X	X
Sex	X	X	X
Disability	X	X	X
Sexual Orientation	X	X	X
Gender Identity	X	X	X
Marital Status	X	X	
Age	X		X
Minor Children	X		

<sup>3</sup> Individuals with discrimination complaints concerning private employment file their complaints with the Vermont Attorney General’s Office, Civil Rights Division.

<sup>4</sup> The Human Rights Commission enforces state anti-discrimination/civil rights laws; it does not enforce federal laws. Vermont law is broader than federal law in terms of the categories of people who are protected from discrimination.

Public Assistance	X		
Breast Feeding		X	X
HIV blood test			X
Ancestry			X
Place of birth			X
Credit history			X
Pregnancy Accommodation			X
Crime Victim			X
Victim of Domestic and Sexual Violence	X		X
Family/Parental Leave Act Retaliation			X
Flexible Working Arrangements			X
Workers' Compensation			X

### **HRC COMMISSIONERS AND STAFF**

There are five Human Rights Commissioners appointed by the Governor, with the advice and consent of the Senate, for five-year terms. Commissioners may be re-appointed. The Commissioners are tasked with hiring and directing the Executive Director and setting the overall policy of the organization. The Commissioners also meet monthly to discuss and decide the merits of individual discrimination complaints.

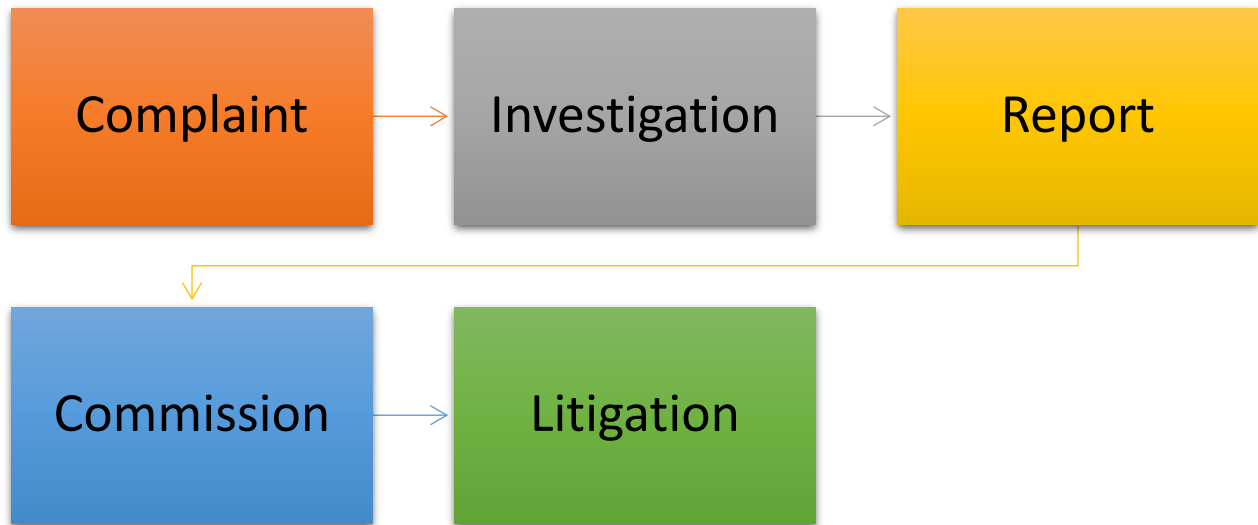
The HRC has a staff of six state employees. The Executive Director is the Commission's appointing authority and is therefore responsible for the administration of the office, management, and supervision of staff. The Executive Director oversees the development of civil rights training, develops the policy and legislative agenda, serves as the legislative liaison and testifies before the Legislature, in addition to serving on taskforces and committees. The Executive Director is also the Commission's legal counsel and reviews all complaints, investigative reports, motions to dismiss, oversees all litigation arising out of the investigations and provides legal advice to the Commissioners.

The Director of Policy, Education and Outreach serves as the community liaison and develops trainings, organizes community events and forums, and maintains the agency's website and social media platforms. The Director of Policy, Education and Outreach also provides legislative testimony to the Legislature, serves on various taskforces and committees and assists with managing federal grants.

The HRC employs three staff attorney investigators whose responsibility is to investigate complaints of discrimination under all statutes within the HRC's jurisdiction, write investigative reports, and make recommendations. Their duties and responsibilities are discussed in greater detail below, under Investigations.

The primary responsibility of the Executive Staff Assistant (ESA) is to receive, analyze and respond to inquiries regarding potential complaints of discrimination, in addition to serving as the administrative assistant to commissioners and staff. These duties include drafting complaints, resolving “informal” investigations, preparing and performing all administrative tasks associated with Commission Meetings, serving as vendor and records liaison, maintaining the case management system, performing data entry and analysis.

### **THE ENFORCEMENT PROCESS**



### **Informal and Formal Complaints**

The HRC receives inquiries regarding potential complaints of discrimination through phone calls, email correspondence, and walk-ins. Through consultation with the Executive Director, the ESA analyzes and responds to all inquiries. Where inquiries and complaints relate to laws not within the HRC’s jurisdiction, the ESA will refer the individual to the relevant agencies or organizations. Some inquiries are opened as an “informal” investigation because they raise narrow, limited, or new legal issues that do not merit a full investigation. Sometimes, matters are opened as informal cases because the complaining individual lacks legal standing. Informal cases are opened by means of an agency letter sent to the Respondent, outlining the allegation that a potential violation of the State’s anti-discrimination laws has occurred. The Executive Director and/or ESA attempts to resolve these matters confidentially. Informal cases that do not resolve may be opened as a full investigation.

Most inquiries to the HRC that fall within the HRC’s jurisdiction are opened as formal investigations and commence with a “complaint.” Typically, a complaint is made to the HRC from an individual or their representative. All complaints must be signed under oath. For an allegation of discrimination to become a formal investigation, a complainant must allege the

*prima facie*<sup>5</sup> elements of a violation of Vermont’s discrimination laws in one of HRC’s areas of jurisdiction: housing, places of public accommodations, or State government employment.

Statutorily, the HRC may bring a complaint and open an investigation without a complainant. However, this is rare. The HRC typically does not have sufficient information from anecdotal evidence or the media to support a complaint alleging a *prima facie* case of discrimination. In the past, the HRC has opened agency-initiated investigations only when the violation was clear. For example, when an identifiable respondent states in an advertisement that they are unwilling to accept Section 8 or minor children in a rental property.

### **Investigations, Conciliation & The Investigative Report**

After a case is opened and assigned to one of the three Staff Attorney Investigators, they independently investigate formal complaints of discrimination by: developing an investigation plan and examination strategy, interview witnesses, request and review voluminous records and other evidence, and research relevant state and federal statutes and case law on all issues.

Staff Attorney Investigators are statutorily responsible for making efforts to conciliate in all matters. While Staff Attorney Investigators are impartial investigators during the course of an investigation, they represent the HRC and the public interest at all stages of both the investigation and any subsequent litigation. Thus, Staff Attorney Investigators may provide input on the strengths and weaknesses of cases to assist the parties in settling.

When matters do not result in a settlement either through conciliatory efforts or mediation, Staff Attorney Investigators write investigative reports that are reviewed and approved by the Executive Director. Investigative Reports are lengthy, involving exhaustive factual findings and conclusions of law, and include a preliminary recommendation of “reasonable grounds” or “no reasonable grounds” to believe discrimination occurred. In many instances, a Staff Attorney Investigator may recommend a “split” finding – that there are reasonable grounds to believe discrimination occurred with respect to one protected category (or respondent or set of facts) but not another. For example, the Staff Attorney Investigator may recommend that the Commissioners find reasonable grounds to believe an employer discriminated against an employee on the basis of sex but not race. Also, the Staff Attorney Investigator may find that one department of the state government violated the public accommodations act but that the other named state department did not. Investigative Reports are distributed to the parties who then have an opportunity to provide a written response and appear before the Commissioners at the next scheduled Commission Meeting.

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<sup>5</sup> A *prima facie* case lists the facts that if proven to be true would be a violation of the specific law. (e.g., in a housing discrimination case the complainant must allege that she is a member of a protected class, that she experienced an adverse housing action and that the adverse action was due to her membership in the protected class.)



## **Commission Meetings**

Commissioners review and consider the reports and responses prior to the Commission Meeting. The parties to the complaint and their representatives are invited to attend the meeting, present the reasons why they agree or disagree with the staff recommendation, and answer questions from the Commissioners about the circumstances surrounding the allegations. The hearings are non-evidentiary. Commissioners discuss the individual cases and make a determination in executive session. Commissioners vote on the record.

If the Commissioners determine there are no reasonable grounds to believe that discrimination occurred, the case is closed and remains confidential. Additionally, the complaining party may decide to pursue legal or other administrative action, but the HRC is not a party to those actions. If the Commissioners determine that there are reasonable grounds to believe discrimination has occurred, the matter is turned over to the Executive Director as legal counsel. The investigative report becomes a public record upon a final determination there are reasonable grounds. As stated earlier, an investigative report may contain several recommendations. If Commissioners vote reasonable grounds on some issues but not on others, the HRC redacts the report so that only the reasonable grounds case is available to the public.

## **Post-Investigation Settlement & Litigation**

If the Commissioners issue a reasonable grounds finding, the Executive Director actively pursues settlement negotiations for a period of up to six months, either directly or through a professional mediator. Past settlements have included the adoption or modification of policies, protocols, and/or best practices, the modification of inaccessible premises, anti-discrimination education, letters of apology, compensation, attorneys' fees and modest civil penalties, or reimbursement of costs to the HRC.

The HRC has legal authority to bring an action in court for injunctive relief, declaratory judgment, and damages. If illegal discrimination is proven to a judge or jury, the court may impose fines, monetary damages, costs, and attorneys' fees against the Respondent/Defendant as well as require other remedial measures to avoid further violations of law.

## **LIMITATIONS OF STATISTICS**

Regardless of the increase or decrease in numbers from year to year, it is important to note that the frequency, nature, and state of discrimination in Vermont is not reflected in the number of calls, complaints, or investigations opened or closed at the Human Rights Commission, or the number of cases that reach a reasonable grounds determination or litigation.

First, many people who have experienced discrimination never file complaints. In general, individuals fear that by coming forward they risk retaliation and potentially losing their housing, job, or future positive or neutral references. These circumstances are exacerbated in a small state like Vermont where economic and housing opportunities are scarce, and an individual's identity and reputation are more public.

Second, following through with a complaint and investigation requires an investment of time and resources that complainants who have experienced the trauma and stress of discrimination, homelessness, and/or unemployment, may lack. For example, an individual wrongfully denied housing due to a protected status is not likely to file a complaint for housing discrimination at the same time they are frantically seeking shelter for themselves and their family.

Third, individuals who have experienced discrimination are disillusioned by a system that reliably fails to hold perpetrators accountable. Employers, landlords, and rental managers may have unclear or nonexistent policies and procedures for reporting concerns. Pursuing a claim may subject the complainant to scrutiny of their allegations and their character. Furthermore, court interpretation of federal and state laws has made it extremely difficult for a plaintiff to prevail in their discrimination lawsuit.

For the minority of individuals who have already lost their housing, their positions, their future employment references, and/or have found security in their current situations and have the time and resources to pursue a claim, there may be several forums available to them outside the HRC. These include filing a complaint at the Office of Civil Rights or Agency of Education. Complainants may pursue a private cause of action through private attorneys or the American Civil Liberties Union or Vermont Legal Aid. Some complainants also grieve their discrimination claims before their employer, landlord, property managers, school boards, the Labor Relations Board, etc.

### **FY2022 HRC STATISTICS**

#### **Phone Contacts**

In FY22 (July 1, 2021 - June 30, 2022), the HRC received 579 calls for assistance from the general public, in comparison to FY21 when the agency logged 514 calls.

July – Sept. 2020	139	July – Sept. 2021	128
Oct. – Dec. 2020	112	Oct. – Dec. 2021	174
Jan. – March 2021	126	Jan. – March 2022	152
Apr. – June 2021	137	Apr. – June 2022	125
<b>FY21 Total</b>	<b>514</b>	<b>FY22 Total</b>	<b>579</b>

The vast majority of phone calls do not result in formal complaints. Many of the calls are individuals seeking assistance for issues beyond HRC’s jurisdiction. Those are referred to other appropriate organizations. Other calls require HRC staff to answer basic questions regarding Vermont’s various anti-discrimination laws. The HRC does not provide legal counsel or advice. Some of the calls result in informal cases and others in formal complaints.

Callers attempting to file private employment discrimination complaints are referred to the Civil Rights Unit in the Attorney General’s Office. Individuals with landlord/tenant concerns not related to fair housing, are referred to Vermont Legal Aid and, if located in or near Chittenden

County, the Vermont Tenants program at the Champlain Valley Office of Economic Opportunity. Those seeking general legal advice receive referrals to Vermont Legal Aid, the American Civil Liberties Union and/or the Vermont Bar Association’s Lawyer Referral Service.

**Website Analytics**

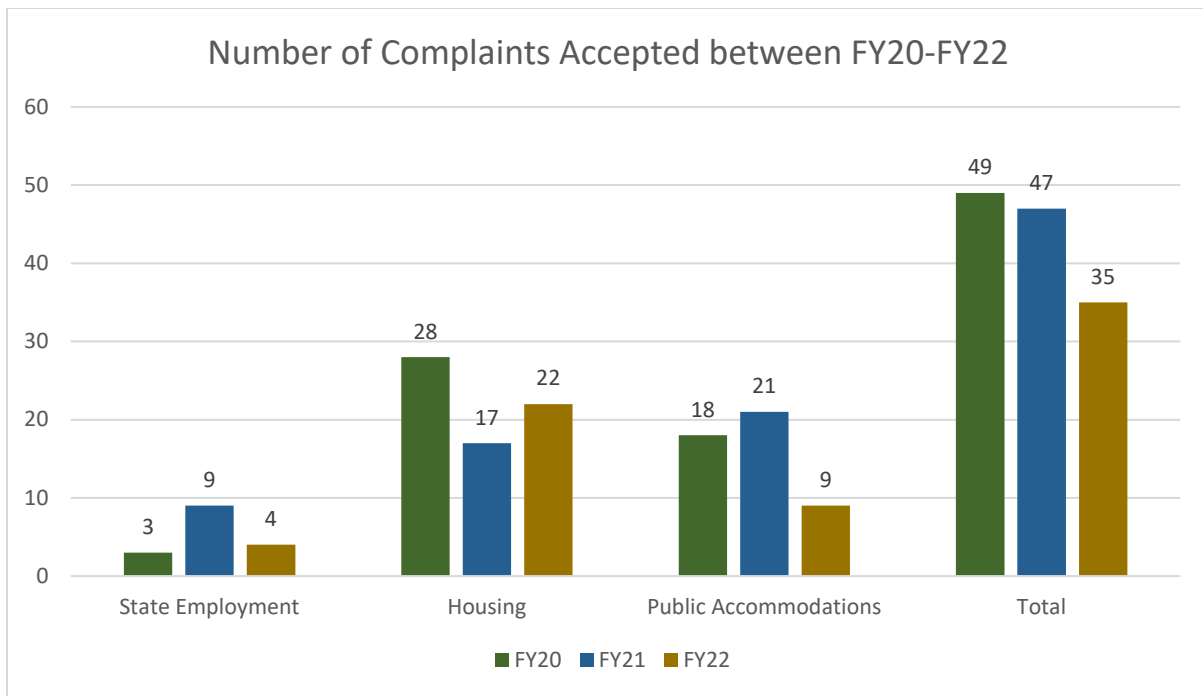
The volume of traffic on the HRC’s website during FY22 increased slightly as compared to the previous years:

	<b>FY20</b>	<b>FY21</b>	<b>FY22</b>
Total Pageviews	25,870	28,602	26,875
Total Users	7,903	9,844	10,748
Total Sessions	11,094	13,754	14,925
Pages per Session	2.33	2.08	1.8
New Visitors (% of traffic)	86.7%	86.5%	87.7%

**Complaints Accepted**

In FY22, the HRC accepted only 35 formal complaints for an investigation. The number of formal cases dropped approximately 25% from FY21’s total of 47. Because the HRC was short-staffed from February through July 2022, the decision was made to be extremely selective with cases accepted for an investigation and then to stop accepting all public accommodations and employment cases in the summer of 2022. The Commission continued to accept housing cases because of its contract with the Department of Housing and Urban Development. This explains why state employment and public accommodations complaints decreased but housing complaints saw a rise.

The chart below shows the number of **formal** complaints accepted in FY22 as compared to the two previous fiscal years.

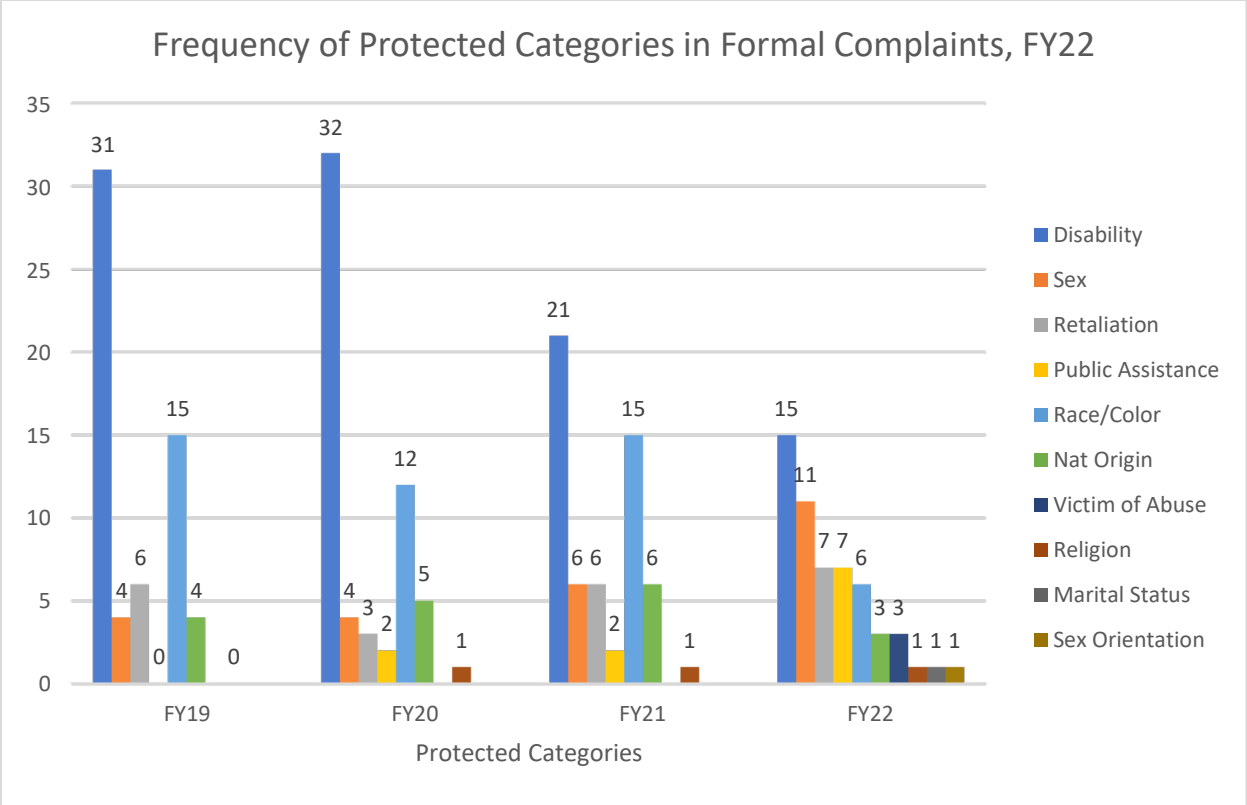


The charts below provides an overview of the most commonly-cited protected categories in formal discrimination complaints. Since complainants may claim more than one protected category per complaint, these numbers do not reflect the number of complaints accepted per year. Discrimination on the basis of disability remains the most prevalent type of discrimination claims brought before the HRC as well as other similar state and federal enforcement entities. What drives these numbers are in part due to reasonable accommodation and modification requests that can be made by persons with disabilities.

#### Protected Categories by Type of Formal Case – FY22<sup>6</sup>

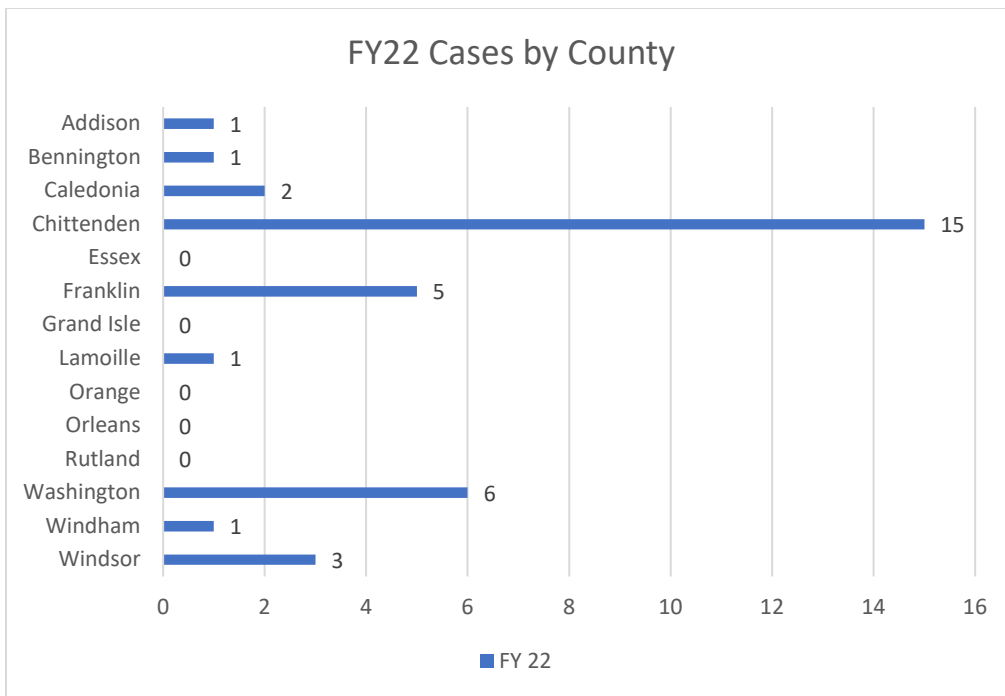
Protected Category	Housing	PA	Employment	Total
Disability	10	5	0	<b>15</b>
Sex	6	2	3	<b>11</b>
Retaliation	4	2	1	<b>7</b>
Public Assistance	7	0	0	<b>7</b>
Race/Color	3	3	0	<b>6</b>
Nat Origin	2	1	0	<b>3</b>
Victim of abuse	3	0	0	<b>3</b>
Gender Identity	1	0	0	<b>1</b>
Religion	1	0	0	<b>1</b>
Marital Status	1	0	0	<b>1</b>
Sex Orientation	0	1	0	<b>1</b>

<sup>6</sup> The chart does not include all protected categories as the HRC did not see formal complaints of discrimination in all areas, including pregnancy accommodations, breastfeeding, pregnancy accommodation, credit history, place of birth, ancestry, workers' compensation, etc.



**AREAS OF THE STATE SERVED**

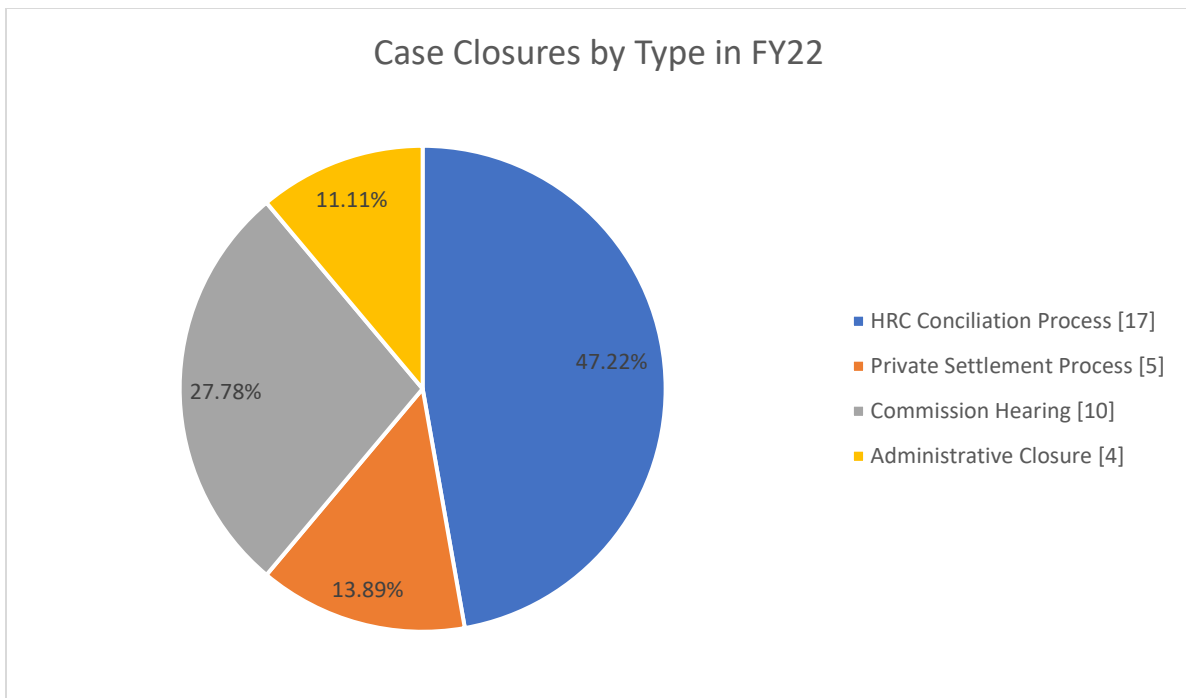
In FY22, the HRC accepted formal and informal complaints from 9 of Vermont’s 14 counties. Out of the two counties with the most complaints, Chittenden County was the source for 43% of total complaints and Washington County was the source for 17%.



**Disposition of Closed Cases**

Cases are disposed of by hearing when Commissioners make a no reasonable grounds finding, conciliation/mediation either pre or post determination, or administrative closure. In total, 35 formal cases were resolved in FY22, including 12 opened in FY22, 14 opened in FY 21, 8 opened in FY20, and 1 opened in FY19.

Just over 60% of the cases closed in FY22 were resolved by a settlement between parties, either within the Human Rights Commission conciliation framework or through a withdrawal of the case with a private settlement. Most of the remaining 39% of closures occurred through no-reasonable-grounds findings at Commission meetings. 11% were closed for administrative reasons, such as a failure by the complainant to cooperate or a complainant voluntarily withdrawing their complaint.



Conciliation/Mediation: Settlements present an opportunity to achieve outcomes that may not be available at the end of a lengthy investigation or through litigation which is inherently risky. Non-monetary relief includes policy changes, employment opportunities, positive or neutral references, opportunities to maintain housing or benefits and services, etc. Many of these outcomes are more important than monetary gains especially in a state like Vermont where employment and housing opportunities are limited for the most vulnerable populations.

Parties can reach a settlement through a conciliation agreement at the HRC, which may occur either before or after a final determination by the Commissioners. These are called pre or post determination conciliation agreements. Parties may also attempt mediation, paid for in part by the HRC. These mediated agreements may be private and require the withdrawal of the complaint. It is not unusual for the parties to attempt mediation or seriously consider settlement until an investigative report is issued to the parties but before the Commissioners have voted. Thus, the HRC investigative process and preliminary recommendations is often critical to and/or the impetus for settlement.

Administrative Dismissals: A dismissal may occur for several reasons. Sometimes, the complainant fails to cooperate with the investigation (i.e. unwilling to be interviewed or to provide information). Other times, a respondent files a Motion to Dismiss and provides compelling facts or case law that merit a dismissal. For example, the named respondent is not the legally responsible party or an initial interview with a witness may reveal facts not previously disclosed by the complainant that places the allegations outside the jurisdiction of the Commission.

From time to time, complainants withdraw their complaints without settlement because they have moved out of state or filed an action in a different forum.

Commission Hearing: Cases which do not resolve through conciliation or administrative dismissal result in an investigative report and are then heard by the Commissioners.

Commissioners review the investigative reports and preliminary recommendations, hear from the parties, ask questions as needed, discuss the individual cases in executive session before voting on the record. Details of the determinations made by Commissioners in FY22 are described below.

**COMPLAINTS BROUGHT BEFORE THE COMMISSION FOR HEARING**

In FY22, the Commissioners heard 19 cases, compared to 16 in FY21, 12 in FY20 and 13 in FY19.

Of the 19 cases heard by Commissioners, there were 28 separate findings delivered. As mentioned above, a singular case may include multiple parties and/or allege discrimination on the basis of multiple protected categories. Commissioners made 18 findings of no reasonable grounds in ten cases and made 10 findings of reasonable grounds determination in 8 cases. In one case, Commissioners found reasonable grounds on a retaliation claim but did not find reasonable grounds on the underlying discrimination claim.

The breakdown of findings by case type is as follows:

Outcome	Employment	Housing	Public Accommodations	Total
Reasonable Grounds	0	3	7	10
No Reasonable Grounds	4	10	4	18

**RELIEF OBTAINED IN CASES CLOSED IN FY22**

Type of Case	\$ Relief for CP	Non-\$ Relief for CP	Public Interest Relief
Employment	\$272,924	Complainant’s pay grade is retroactively adjusted  Complainant provided health benefits for one year following retirement	State adds hire-into-range policy to the curriculum of 'Supervising in State Gov' course and to SuccessFactors hiring guidance used by supervisors.
Housing	\$57,250	Respondent grants accommodation request for emotional support animal	Respondent undergoes Fair Housing training conducted by HRC (9)



		Respondent provides a neutral reference and certify tenant’s good standing re: Section 8 voucher	Respondent allows HRC to review existing policies and procedures (5)  Respondent agrees to publicly post a fair housing policy and notice of fair housing laws
Public Accommodation	\$187,500	Respondent provides public apology to Complainant	Respondent’s employees undergo training conducted by HRC (3)  Respondent creates Limited-English-proficiency request tracking system and implements a translation services program  Respondent agrees to update grievance policy with an internal review process for discrimination complaints
Total	\$517, 674		

Relief obtained refers specifically to cases closed in the fiscal year that resulted in monetary and/or non-monetary outcomes. The total monetary relief obtained in FY22 was marginally higher than the \$502,498 obtained in FY21 and significantly higher than the FY20 total of \$117,540.

**OUTREACH AND TRAINING**

The HRC endeavors to reach all Vermonters and therefore met with employees and managers of the State government, Legislators, community members, victims’ advocates, housing providers such as landlords and rental managers, tenants, tenant associations, private and non-profit attorneys, and a variety of service providers.

During FY22, the HRC reached a total of 1692 individuals through 53 training and outreach events compared to FY21, when it conducted 50 events that reached approximately 2395 Vermonters. These numbers do not include the number of views of video recorded trainings after the event.

Type	Number of events	Number trained
Outreach Events	12	481
HRC Civil Rights Conference, April 2022	7	144
Fair Housing Trainings	12	135
Race and the Legal Profession	5	428
Act 1 & Equity in Education	5	120
Implicit Bias & Bystander Intervention	7	223
Other (language access, harassment, etc.)	5	161
Total	48	1692

### **SUMMARY OF CASES THAT WENT TO LITIGATION:**

In previous years, the Commission’s ability to file litigation was significantly hindered by the fact that it did not have a full-time litigator. At the Commission’s request, the Legislature appropriated funds to support more litigation. This created the opportunity to contract for legal services. The Commission filed the following lawsuits (some of which have since settled and closed):

Congress/HRC v. Centurion, LLC and Department of Corrections  
Disability discrimination in a place of public accommodations

Cornelius/French v. Cedar Ridge LLC (Socinski)  
Disability discrimination in housing

Bailey/HRC v. Marijo’s Properties  
Sexual harassment in housing

Sanchez et. al./HRC v. Polak  
National origin discrimination in housing

Clemmons v. State of Vermont (Vermont State Police and Department of Public Safety)  
Race, color and sex discrimination in a place of public accommodations

“Moss” v. Orchard School and South Burlington School District  
Race, color discrimination in a place of public accommodations