

**MONTANA DEPARTMENT OF LABOR & INDUSTRY
EMPLOYMENT RELATIONS DIVISION
HUMAN RIGHTS BUREAU**

<p>Michelle O'Neil, Charging Party, vs. City of Kalispell and Kalispell Police Department, Respondent.</p>	<p style="text-align:center">Final Investigative Report</p> <p>HRB Case No. 0180197 & 198 EEOC Case No. 32D-2018-00197 & 198C</p>
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Recommendation: Based on its investigation, the Bureau finds **no reasonable cause** to believe unlawful discrimination and retaliation occurred as alleged in Charging Party's complaint.

I. ISSUES PRESENTED

A. Whether the City of Kalispell and Kalispell Police Department discriminated against Michelle O'Neil in the area of employment because of her sex and disability in violation of the Montana Human Rights Act (Title 49, Chapter 2, MCA), Government Code of Fair Practices (Title 49, Chapter 3, MCA), Americans with Disabilities Act, as amended, and Title VII of the Civil Rights Act of 1964, as amended, by failing to promote her.

B. Whether the City of Kalispell and Kalispell Police Department discriminated against Michelle O'Neil in the area of employment because of her sex and disability in violation of the Montana Human Rights Act (Title 49, Chapter 2, MCA), Government Code of Fair Practices (Title 49, Chapter 3, MCA), and Title VII of the Civil Rights Act of 1964, as amended, by subjecting her to a hostile work environment.

C. Whether the City of Kalispell and Kalispell Police Department retaliated against Michelle O'Neil because she engaged in a protected human rights activity in violation of the Montana Human Rights Act (Title 49, Chapter 2, MCA), Government Code of Fair Practices (Title 49, Chapter 3, MCA), Americans with Disabilities Act, as amended, and Title VII of the Civil Rights Act of 1964, as amended, by failing to promote her.

II. SUMMARY OF THE INVESTIGATION

This report constitutes a summary of the investigation conducted in this case. Content of this report is limited to witnesses, documents and other evidence relevant to the analysis of the issue presented. The case file may contain additional evidence not included in this report.

A. Charging Party's Position Statement and Rebuttal:

In 1999, Michelle O'Neil (O'Neil) began working for Kalispell Police Department (KPD) as a patrol officer. Throughout her employment, O'Neil has been one of the few female officers in a male-dominated workplace. She consistently has received high scores on her annual evaluations.

Between 2002 and 2003, O'Neil received unwelcome emails of a sexual nature from two male officers. After noting the emails to department administrators no actions were taken against either officer. Administrators only required officers to better monitor who sent things from their accounts. Throughout the next years of her employment, officers would make inappropriate sexual comments during meetings and continued to do so even after O'Neil complained.

In 2008, O'Neil was pregnant and applied for a promotion to sergeant. She had received favorable reviews from administrators and had noted her interest in 2006 to receiving this promotion. Administrators did not promote her in 2008 nor place her on the eligibility list. In July 2012, O'Neil was pregnant and working a special assignment investigating sex crimes. Her supervisor wanted to make the rotation a five-year assignment because it required special training but the chief of police, Roger Nasset (Nasset), would not extend it after hearing O'Neil was pregnant again. He said O'Neil would return to patrol and subsequently denied her request for light duty or special accommodations.

In January 2013, someone placed a biblical verse in her locker that read: "I do not permit a woman to teach or assume authority over a man; she must be quiet." Some male officers and Nasset attend a church in the area known for its beliefs that women must be subservient to men. In December 2015, Nasset removed her as the field training supervisor without warning. In 2016, O'Neil expressed interest in a detective and school resource officer position but male officers received the positions instead.

In October 2017, the advertisement for a sergeant position went out and O'Neil applied. In early November 2017, after testing for the promotion, O'Neil asked to review her scores with one of the captains, Tim Faulkner (Faulkner) but he would not meet with her. He subsequently met with the other candidates. After asking again, Faulkner met with her and said she scored the highest on the written test and had the fourth highest interview score. O'Neil also had a supervisory certificate from the police training academy and more hours of law enforcement training than any other officer.

O'Neil did not receive a promotion to sergeant but a male officer with less experience did. KPD has never promoted a female officer into a sergeant position or higher.

B. Respondent's Position Statement:

Around 2002, O'Neil received emails of a sexual nature but also had sent emails of similar content to other officers. These incidents were investigated and administrators asked officers to better monitor their accounts. O'Neil did not formally complain about this though she would often ask officers to better monitor their language in the workplace. She did not complaint or notify supervisors about any biblical verses left in her locker.

In 2009, O'Neil tested for an open sergeant's position and finished fourth out of eight candidates. She then went onto rotation as a sergeant and left that assignment after three years, which is department policy. This had nothing to do with her sex or disability and female officers have participated in the rotation since O'Neil.

Her request in 2012 to have light duty during a pregnancy was the first such time this had happened at KPD. Her request would limit the types of equipment she could carry on patrol and KPD initially denied her request. It later allowed her to have specific alterations to her equipment and created a policy for pregnant officers who were on patrol assignments.

She did not receive a detective assignment in fall 2016 because department policy dictated officers who had not been on that rotation in the past receive it. A male officer who had not been in detectives received the assignment for that reason.

O'Neil competed for the sergeant promotion in 2017. She received the highest written exam score, the fourth highest interview score, but was the second to last in the leadership assessment. This placed O'Neil eighth out of the ten people who applied. Two male officers had lower scores than her and a female officer had a higher score than O'Neil and other male officers. Sergeants and administrators gave her low marks in leadership because she had low productivity and did not lead by example.

While O'Neil never received any formal disciplinary action, supervisors have counseled her for issues related to low productivity. She was recently given a performance improvement plan for those issues. KPD does not dispute she is a competent and technically proficient officer but O'Neil lacks the leadership skills the department desires for sergeants.

C. Witnesses:

Michelle O'Neil, Charging Party, is the second female officer KPD has ever hired. Her initial field training was with an officer who believed females should not be in law enforcement. Other officers said they did not want her there but over time she proved herself capable and some of them said they wanted her as a partner. However, many of the officers who were with her when she first started are now administrators and their attitude remains.

Around 2003-2004, O'Neil said she wanted to be on the SWAT team but KPD instead sent her to negotiations training because administrators wanted a "female" voice. O'Neil received some special tactics training but administrators told she would never use it.

Former police chief Frank Garner (Garner) placed O'Neil into a field training supervision job in 2006 before he left the department. This was normally a sergeant's position but Garner and the former supervisor had confidence in O'Neil. O'Neil received this position over the seniority of other officers. She did not ask for further special assignments, rather, administrators asked her to take them since she was well-known in the community.

Nasset took over for Garner and changed the hierarchy of the department after a few years. There were three captains and no lieutenants anymore and it was unclear who was in command. In 2008, administrators made her an acting sergeant but never promoted O'Neil because there was not enough budget funding at the time. O'Neil has tested several times

there have been openings since 2005 but usually officers know ahead of time through rumor who will be the choice. Since O'Neil did not receive sergeant promotions in the past, it has limited her ability to rise into captain ranks like other patrol officers. They are all male.

O'Neil acknowledged she has low numbers of citations. This, however, is not due to her being inactive or sitting around the office avoiding work. Rather she is there writing reports for other officers and sergeants who do not feel comfortable with them. In early 2016, she had a difficult pregnancy then took four months off. She came back in fall 2016 and trained new recruits who got credit for the citations. Her current supervisor, Sergeant Alan Bardwell (Bardwell) told O'Neil he does not like to supervise her because he believes she should have the same rank as him.

In fall 2017, Andy Haag (Haag) received the promotion even though he had less time in patrol than O'Neil. O'Neil held the exact same special duties as Haag.

Subsequent to the hiring decision, KPD put O'Neil on a performance improvement plan requiring her to produce at least ten citations a month. Where O'Neil would normally give people a warning, she instead has to write a ticket. She is re-evaluated on these standards every two weeks.

O'Neil noted harassment continued through present day but when asked to provide specific examples of sexual or any other harassment directed at her did not provide any details.

Roger Nasset, former chief, retired in December 2017 after twenty-three years with KPD.

Nasset referred to "two O'Neils." One was involved in numerous community activities and seemed to be very active in those efforts. In 2013, the second version came back to street patrol and Nasset wanted her to show officers what community involvement looked like. She was supposed to prove herself as a leader of other officers but never followed through and, instead, displayed a lack of initiative.

After she came back to patrol, other officers told Nasset she was not being productive. They said she was doing personal things on her phone when they were responding the calls or showed up late to calls so she would not have to do reports. O'Neil and Nasset worked the same day shift. O'Neil came to his office at least once every two weeks to talk about personal things or department business. She never said anything about equal opportunities or feeling discriminated against.

There is not a lot of turnover at KPD so there are sergeant promotions only once every few years. Nasset has been on approximately six promotion boards and O'Neil also competed in those. In answer to questions, she would say what would be assumed or what she should do but was not doing in reality. O'Neil just did not have the characteristics a leader should show.

In November 2017, the members of the promotion board made a choice based on the qualities of the candidates and the scores of the officers who applied. Nasset had the discretion to promote a candidate he preferred. Since scoring resulted in a tie, he let the group choose. The decision came down to seniority because Haag had more years of service and everyone spoke highly of his performance and conduct.

Wade Rademacher, Interim Chief, has been with KPD for 24 years.

O'Neil started out well and wanted to do everything and get as much training as possible. She took on special duties like detective and school resource officer for about four total years then returned to patrol. Her demeanor changed when she returned to patrol and was not as active as she had been before. She spent a lot of time at the police station and on the computer. Administrators noticed her productivity severely decreased and she was not performing as they expected of a police officer.

She did not make any complaints to Rademacher about retaliation or discrimination. She talked with him about differences she had with policies or other officers but nothing about being mistreated.

Administrators consider the sergeant promotion to be one of the most important for the department since the sergeants are in charge of the shift: Members of the promotion board want officers who can lead from the front and motivate. For that reason, they weight the leadership portion of the exam the heaviest.

O'Neil did well on the written portion and okay in the interviews. She lost most of her points in leadership scoring. The administrators and sergeants rank people in different categories then compile the scores. They are looking for an officer who would be a role model for other officers and O'Neil was not that person because she always seemed to be in the station and not out on calls. Her traffic stops and citation numbers showed this was the case and that she was not the officer she had been before.

For the November 2017 promotion board, Haag performed the best across the qualification tests. He had the highest interview score, was close to the top on the exam, and was second highest in terms of leadership abilities. The board ultimately chose him over another candidate because he had seniority.

Tim Faulkner, Patrol Captain, has been with KPD for 20 years.

O'Neil and Faulkner got along when she first started. They were on different shifts and later she was on special assignments so he rarely saw O'Neil at the station.

She returned to patrol about five years ago and did not seem happy to be back. Faulkner gave her nudges to fix some issues and wanted her out of the station more often. Other officers and sergeants noticed she was in the station a lot, so Faulkner asked the sergeants to work with her. O'Neil always had excuses for why she was there, which usually involved being busy with outreach programs. Those were additional duties and her primary duty was being on patrol.

In the past couple years, Faulkner removed O'Neil from the training program and background investigations. He wanted her out of the station and doing her patrol duties. When he told her about the changes she had no issues. Even with the adjustments, her numbers continued to be low and O'Neil would say was that she was working on reports at the station. In 2016 and 2017 she had the lowest number of traffic stops and citations.

In 2015, O'Neil did not perform well in the promotion board and Faulkner told her that she needed to improve her traffic stop and citation numbers. He did not put her on an improvement plan because he wanted to give her time to improve. In fall 2017, she scored low marks on most all leadership categories because of the continuing issues.

Haag was a very proactive officer, who had numerous citations and arrests and worked additional shifts and details. He was not as community involved or technically proficient as O'Neil but he had better qualities for leadership.

Alan Bardwell, senior patrol sergeant, has been with KPD for 29 years. He is the longest serving sergeant in the department's history.

He was one of O'Neil's training officers when she started in 1999 and she learned the tasks quickly. There were still "mixed opinions" around the station about females working as police officers. Most of the officers at the time went to bars after work and sought out women. They also believed police officers had to be six feet or over to be good at their job but O'Neil was 5'5" and weighed 120 pounds. Some officers were not comfortable with her being there. But she was tested on patrol and performed well. She rarely failed at anything and officers began to respect her more.

O'Neil excelled at all of her tasks and even sought out her own grants to get funding for training and special courses. No one had ever done that before and other officers learned from her example.

She came back to patrol because that was the rotation and she did not seem upset about it at the time. She had a lot of personal emergencies in that time and was taking time off. Administrators asked why she was taking so much time off but Bardwell looked into it and saw she was not missing much more time than several other patrol officers.

Her low number of traffic stops and citations caused her some issues but O'Neil spends a lot of time being methodical with investigations. She has always been there to assist Bardwell and handle any calls that come in. He did not see anything O'Neil was doing as being lazy or trying to avoid work. However, O'Neil should have written more tickets and citations to make her more competitive with the other officers but she is not doing that. Bardwell has asked her to make contacts on the street each shift because that can bring citations.

O'Neil can do everything asked of her and is as competent as the captains. She is more qualified than some of the other sergeants as well. Haag is a great officer and will make a good sergeant but he will not be able to jump into every aspect of the work like O'Neil could.

Bardwell does not think O'Neil being female prevented her promotion but administrators had noted concerns with the times she was out with pregnancies. Other officers also said the time she was out made things more difficult.

Karen Webster, police officer, started in 2006. She was a patrol officer and now handles sex crimes investigations for KPD.

O'Neil was Webster's training officer and took Webster on her initial patrols in Kalispell. They sometimes discussed the difficulty of being a female officer in the department. Female officers are not overtly treated differently but there are subtle moments where they are. Most of the comments regard physical limitations of female officers or whether they could do the job.

Webster does not understand how administrators measure officers by citations and traffic stops. There is no concrete number they must achieve and she has asked sergeants whether

her numbers are too low. Citations and traffic stops are a part of the job but there are other options to evaluate officers' performance.

Webster has applied twice to sergeant but withdrew her first application. Her second attempt was in the fall 2017 promotion and Webster thinks she did well. Webster does not see why O'Neil could not be a sergeant because she is qualified and really wants the position.

Officer Jason Parks, police officer, has been with KPD since 2008.

O'Neil was his contact when transferred from Nevada to KPD. She conducted his background check and field training. He had no issues with how she conducted those.

The summer of 2012 was last time they worked directly together. O'Neil is intelligent and a good police officer. O'Neil is proactive when she needs to be and is one of the best officers at handling investigations. She does not chase statistics to get ahead. While officers get judged on citations there is more important work like investigations where she excels. O'Neil may look like she is not proactive but she is doing investigations and taking her time to make sure they are thorough.

Parks knew O'Neil applied to be sergeant several times but has not been selected. O'Neil is capable of being a sergeant and would be a good patrol leader. There are officers at KPD who have subtly indicated they would not work for a female sergeant. O'Neil has served as lead officer over Parks and he had no issues with her. Parks could apply for promotions to sergeant but has not because there are still other duties he wants to have.

Parks is pressured to do traffic stops, two a shift, and completes that as much as he can.

David Massie, police officer, has been with the department since March 2010 and is currently serving a rotation as a detective.

He sees O'Neil as a good officer and works in detectives with her spouse. O'Neil said Massie had heard one of the captains saying she would never receive a promotion but Massie does not recall anyone ever telling him that. There was no way a captain would have said something like that. He has not heard officers make comments about female officers not being up to standards.

He is surprised O'Neil has not been promoted because she has been through so much training. But she is also inactive at work and he has seen her do personal things on her cell phone during work then would not leave the office for calls. Other officers have also commented to him that she does not do as much work as they do.

D. Documents:

January through April 2017 End of Phase evaluation for O'Neil from Bardwell giving her a six out of seven for "self-initiated field activity" and seven for "attitude with work and peers." Bardwell noted O'Neil was a "big help" to him every day and her attitude motivated other officers.

November 2017 Final Assessment for officers in the promotion board noting Haag and Venezia had tied with total scores of 78.1 Webster had a 73.3 and O'Neil a 71.2 The two officers below her scored 69.2 and 66.2. O'Neil had the third highest performance score but

the lowest leadership score. Haag had the highest performance score and third highest leadership score.

O'Neil had the second lowest administrator's leadership assessment score and lowest score among the sergeants who ranked her.

November 2017 Leadership Assessment scores from captains and sergeants showing O'Neil received the lowest scores in "initiative" and "motivational ability." She received one or two out of 10 from several officers for initiative and three or four out of 10 for motivational ability. Notably, Bardwell scored O'Neil a three for initiative and five for motivational ability.

Haag received several eight of 10 scores for initiative (to include Bardwell) but also scores of four (to include Nasset). His motivational ability scores ranged from 5 to 10. Venezia's scored mostly seven and eight in initiative and six to eight in motivational ability. Webster scored mostly seven to eight in initiative and mostly six to seven for motivational ability.

E. Comparative Evidence:

There are 38 officers serving in KPD—three are female and the remainder are male. There has not been a female sergeant or above in this history of the department. Both O'Neil and Webster serve as "master patrol officers," though that is not a rank or promotion.

2013-2017 Traffic Stops for O'Neil, Haag, Venezia, and Webster

	O'Neil	Haag	Venezio	Webster
2013	38	649	225	249
2014	85	112	309	163
2015	106	1	255	4
2016	33	6	212	1
2017	37	284	31	4

2013-2017 Citation for O'Neil, Haag, Venezia, and Webster

	O'Neil	Haag	Venezio	Webster
2013	58	541	162	135
2014	117	109	314	129
2015	116	7	305	2
2016	50	5	175	1
2017	32	123	18	3

****In 2015 and 2016, Haag was assigned as a detective. Webster began working the sex crimes investigations in 2015.**

F. Omissions:

O'Neil suggested several more potential witnesses to interview but the investigator determined the witnesses noted in this report provided sufficient testimonial evidence to support a finding.

III. ANALYSIS

O'Neil alleges KPD unlawfully discriminated against her in the area of employment because of her sex and disability by subjecting her to a hostile work environment. O'Neil alleges KPD unlawfully discriminated against her in the area of employment because of her sex and disability by failing to promote her. O'Neil alleges KPD unlawfully retaliated against her because she engaged in a protected human rights activity by failing to promote her.

O'Neil alleges KPD unlawfully discriminated against her by subjecting her to sexual harassment, however, this claim is untimely. The alleged acts of sexual harassment all occurred more than 180 days prior to O'Neil's filing with the Human Rights Bureau (Bureau). Therefore, O'Neil's claim of sexual harassment does not satisfy the statute of limitations set forth in Mont. Code Ann. §49-2-501(4)(a).

Further, the allegation regarding disability discrimination stems from a complicated pregnancy in 2016, which also renders this allegation untimely for the November 2017 promotion board. She has not shown how her most recent pregnancy caused an actual disability, therefore there are no protections.

O'Neil alleges KPD unlawfully discriminated against her based on sex and disability, and retaliated against her for engaging in protected activity, when it failed to promote her to the position of sergeant. O'Neil establishes she filed a timely complaint related to the November 2017 sergeant's promotion. The Bureau has jurisdiction over O'Neil's complaint.

Failure to Promote

To establish a prima facie case of disparate treatment, O'Neil must show:

- 1) she is a member of a protected class and/or participated in a protected human rights activity;
- 2) KPD subjected her to an adverse act; and
- 3) circumstances surrounding the adverse act raise a reasonable inference that KPD treated her differently because of her membership in a protected class and/or because she participated in protected activity.

Here, O'Neil belongs to the protected class of sex. She also engaged in protected activities when she complained about sexual harassment and received leave as an accommodation for a complicated pregnancy. In November 2017, KPD did not promote her to the rank of sergeant. The officer received the promotion is male and has not engaged in protected activity, which raises a reasonable inference KPD treated O'Neil differently because of her sex and/or protected activity. O'Neil successfully establishes a prima facie case of sex discrimination and retaliation.

Once a Charging Party establishes a prima facie case, the Bureau turns to the Respondent to produce a legitimate, non-discriminatory/non-retaliatory reason for the challenged action. KPD contends O'Neil was not performing to department standards and those issues factored into the November 2017 promotion decision. Two male officers scored higher than O'Neil overall because the promotion board felt they exhibited better leadership qualities. O'Neil's performance, specifically her low numbers of traffic stops and citations, did not show the leadership expected of an officer desiring to move up the ranks.

Once Respondent sets forth a legitimate, non-discriminatory/non-retaliatory reason, the Bureau asks the Charging Party to demonstrate the reason offered by the Respondent is a pretext for discrimination/retaliation. A Charging Party can prove pretext with direct evidence the Respondent's actions were more likely based on an unlawful motive or indirectly with evidence that Respondent's explanation for the challenged action is not credible or worthy of belief.

O'Neil counters that her numbers may be lower than other officers, however, that is only because she performs additional tasks such as writing reports for others. O'Neil has worked hard to earn respect as a female officer after being denied opportunities like SWAT team membership, and then being placed into roles that are more feminine. She said sergeants, specifically Bardwell, have complimented her abilities and said they did not understand why she never received a promotion in her nearly two decades with KPD. She said former chief Nasset did not believe women should have responsibilities and he based professional decisions on that belief. O'Neil believes her complaints about officer conduct and experiences with past pregnancies caused her to lose out on promotions.

There is no doubt O'Neil has fewer traffic stops and citations than other officers. Of note, in 2017 Haag compiled as many traffic stops as O'Neil compiled in the previous four years combined. O'Neil's citation numbers were equally low. Nasset, the two captains, and Massie all said the low numbers showed that O'Neil had lost her motivation as a patrol officer. She mostly worked at the station while other patrol officers took the calls.

Employment records offer some support to O'Neil's position. Notably, her 2017 performance evaluation did not note any issues regarding low numbers and in fact referred to her as a "big help" who motivated other officers. Motivation is a key component of leadership evaluation.

Bardwell, the supervisor who wrote her 2017 evaluation, spoke of O'Neil in glowing terms and explained that she had long been ready for the rank of sergeant. He did not describe her as lazy or inactive, but Bardwell did state that O'Neil should have increased her numbers to remain competitive with other officers competing for promotions.

Bardwell also noted administrators and other officers had expressed concerns about O'Neil's pregnancies and related leave time. Bardwell said after reviewing the leave of all the officers that O'Neil had not missed more time than several other officers. For that reason, her pregnancy-related leave should not have been a concern. Yet, that remained a concern to some of the department.

Webster, a female officer with nearly a decade of service to the department, spoke about subtle culture inside KPD that questions whether female officers have the same capabilities as male officers. Officer Parks agreed with this and said there are some officers who would not work with a female sergeant. Parks noted this was not a concern to him and that he considered O'Neil to be a good leader and co-worker. Parks said O'Neil is doing things that other officers are not, like investigations, rather than spending her time racking up citations and traffic stops. He did not describe O'Neil as lazy or inactive.

The KPD leadership assessments certainly bear out how Haag and Venezio scored higher than other officers. Undeniably, these leadership assessments are based on subjective feedback from KPD staff. This structure allows for the potential of discriminatory animus to impact scoring. For example, an individual submitting scores for the leadership assessment could issue low scores based on protected class status rather than merit; thereby, disadvantaging members of that protected class in the promotion process. The subjective nature of this process demands further scrutiny of those who submitted low scores for O'Neil. This investigation applied such scrutiny and determined Bardwell to be an important indicator that discriminatory and/or retaliatory animus did not impact KPD's decision regarding O'Neil's promotion.

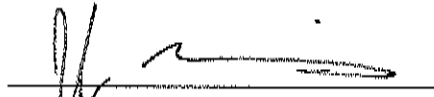
Despite his positive words about O'Neil, Bardwell had given O'Neil low scores on the categories that reflected initiative and motivation. Bardwell, who openly supports O'Neil's promotion to the position of sergeant, submitted leadership assessment number comparable to those of other sergeants, captains, and Nassat. Said another way, considering only the leadership assessment numbers submitted by Bardwell, O'Neil still would not have received the highest score for the sergeant promotion. This is strong evidence suggesting that KPD's decision not to promote O'Neil was based on legitimate, non-discriminatory/non-retaliatory reasons.

KPD has provided evidence showing that two male officers scored higher than O'Neil in the November 2017 promotion board. Those higher scores can be explained, in part, by a perception among some KPD coworkers that O'Neil lack initiative due to her low number of citations and traffic stops. Both Bardwell and Rademacher said they asked O'Neil to improve her numbers but there was no increase at all in 2016 and 2017. Notably, Bardwell scored her lower than other officers in the categories of initiative and motivation. This was despite Bardwell's stated support for O'Neil's rise to the rank of sergeant. While officers noted a subtle disdain for female officers within the department and Bardwell noted some officers had issues with O'Neil's pregnancy-related leave, ultimately O'Neil did not perform as superiors expected ahead of the fall 2017 promotion board. Those performance concerns were reflected in her low leadership scores.

O'Neil does not prove by a preponderance of the evidence that the reasons offered by KPD were a pretext for discrimination or retaliation.

Conclusion

Based on its investigation, the Bureau finds **no reasonable cause** to believe unlawful discrimination and retaliation occurred as alleged in Charging Party's complaint.



Josh Manning, Investigator
Montana Human Rights Bureau

August 27, 2018
Date