JURISDICTIONAL PRESERVATION AND RECORD PROTECTION NOTICE MANDATORY INTEGRATION OF UPDATED EVIDENCE INTO EEOC RECORD EEOC CHARGE NO.: 12K-2025-00001

This declaration is submitted under the express authority of 29 C.F.R. § 1601.18(b), EEOC Management Directive 110 (MD-110) § 2-302, and controlling federal precedent to preserve jurisdiction, protect the accuracy of the administrative record, and prevent premature termination of investigatory or enforcement activity. Substantial new evidence, including third-party agency reversals, formal documentation of ADA procedural violations, and materially contradictory factual claims by the Respondent, has now been entered into record. These facts directly rebut and undermine the factual basis relied upon in the Commission's May 28, 2025 Dismissal and Notice of Rights.

This filing is not a discretionary appeal; it constitutes a jurisdictionally protected update under federal regulation and binding guidance. The record **must not** be administratively closed, construed as final, or deemed exhausted without formal integration of these corrections. To do otherwise would represent a failure of investigatory due process and may expose the Commission to future liability for refusing to incorporate material facts, disability-based retaliation evidence, and systemic ADA violations.

Accordingly, the Complainant requests immediate supervisory review, investigative re-opening under 29 C.F.R. § 1601.18(b), and coordination with the systemic unit and/or the U.S. Department of Justice as authorized under 42 U.S.C. § 12117(a).

UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

CHARLOTTE DISTRICT OFFICE

IN THE MATTER OF:

Thomas D. Coates, Claimant

٧.

Cox Communications, Inc., Respondent EEOC Charge No.: 12K-2025-00001

DOJ ADA Complaint No.: 536785-LFD | DOL WHD Matter: [Pending]

NOTICE OF MEMORIALIZATION OF NEW EVIDENCE AND RECONSIDERATION OF UPDATED EVIDENCE (PART A)

UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

CHARLOTTE DISTRICT OFFICE

IN THE MATTER OF:

Thomas D. Coates, Complainant

٧.

Cox Communications, Inc., Respondent EEOC Charge No.: 12K-2025-00001

DOJ ADA Complaint No.: 536785-LFD | DOL WHD Matter: [Pending]

Date: June 11, 2025

To: Mrs. Elizabeth Rader, District Director, Charlotte District Office

Cc: Ms. Veronica Chaney, District Director's Secretary U.S. Equal Employment Opportunity Commission

129 W. Trade Street, Ste. 400 Charlotte, NC 28202 veronica.chaney@eeoc.gov

There are moments when the record itself becomes the argument—when facts, once gathered and aligned, reveal a pattern so persistent and disregard so systematic that the only just response is intervention. This submission is such a moment.

Following a verified medical separation, the Virginia Employment Commission (VEC) reversed its denial of my unemployment claim. In doing so, it formally concluded that Cox Communications' assertions—namely, that I voluntarily resigned—were false. The legal and factual implications of that ruling cascade into every aspect of this case: wrongful termination, ADA interference, ERISA fraud, and retaliatory motive.

Within hours of submitting a written ADA accommodation request for a serious cardiac condition, I was placed on unpaid leave, locked out of systems, and stripped of pay. No interactive process occurred. Within days, Cox unilaterally reversed my disability pay status and proceeded to characterize my departure as voluntary. When I submitted intent to escalate the matter to the DOJ, my employment was coded as resigned that same day. These are not disputed facts—they are timestamped, emailed, and preserved in payroll metadata.

Cox's unsigned EEOC position statement lacks supporting documentation, affidavits, or witness input. It stands in stark contrast to the administrative findings of the VEC, the MetLife STD reversal documents, and my email record—none of which Cox addresses or even acknowledges. The retaliation timeline is undeniable: a protected ADA act is met with financial punishment, constructive discharge, and submission of false federal claims.

The EEOC must not allow employers to insulate misconduct through silence. An unsigned narrative is not evidence. An accommodation process that ends in punishment is not lawful. And a resignation that follows agency contact is not voluntary.

The attached timeline, evidence summary, and sworn declarations—along with multi-agency submission—form a complete record of constructive discharge under ADA Title I. I respectfully request EEOC escalation to systemic and/or DOJ coordination per 42 U.S.C. § 12117(a) and Green v. Brennan, 578 U.S. 547 (2016).

I ask that this matter now be elevated for formal charge consideration, including referral to the systemic unit or DOJ coordination, in accordance with EEOC Directive 915.003. I am prepared to supply all corroborating exhibits and sworn declarations upon request. The retaliation I suffered was not a misunderstanding—it was a deliberate suppression of rights. The evidence is aligned. The law is clear. The question now is whether accountability will follow.

Notice of Material Reversal Supporting Reconsideration Request:

On formal review, the Virginia Employment Commission (VEC) has issued a binding reversal of its prior decision, determining that the separation of Thomas D. Coates from Cox Communications was not voluntary, but instead medically necessitated. This administrative finding carries probative weight and directly rebuts the Respondent's central claim of resignation made in its April 11, 2025 Position Statement. The VEC's adjudication now constitutes a duly recognized governmental determination in direct conflict with Cox's unsupported narrative. In light of this material development, reconsideration of

the EEOC's prior disposition is both warranted and necessary under applicable standards of administrative review.

Legal Basis for Escalation: Retaliation, ADA Interference, and Constructive Discharge

- ADA Violation: Immediate retaliation after a written request for reasonable accommodation, in direct conflict with 42 U.S.C. § 12112(d)(4).
- Constructive Discharge: Resignation forced under discriminatory and intolerable conditions, as clarified in Green v. Brennan, 578 U.S. 547.
- FMLA/ERISA Misrepresentation: Employer altered disability status and denied leave continuity, violating medical leave protections.
- False Agency Filings: Cox submitted an unsigned, unsupported narrative to the EEOC and misrepresented facts to the Virginia Employment Commission and insurer.

Official Submission Statements for Record and Certification with Case Law References

OFFICIAL SUBMISSION AND CERTIFICATION

This document is hereby submitted as an official and certified record, prepared and executed in accordance with all applicable federal, state, and agency requirements. All statements, evidence, and representations contained herein are true and correct to the best of my knowledge, information, and belief.

DIGITAL SIGNATURE AND AUTHENTICATION

This submission is digitally signed and authenticated by the undersigned, with all supporting materials maintained in secure, tamper-evident digital storage. The integrity of this record is preserved for all investigative, administrative, and judicial proceedings.

SHADOW COPY AND OVERSIGHT DISTRIBUTION

A shadow copy of this document, including all exhibits and supporting evidence, has been securely transmitted to designated oversight authorities and third-party compliance monitors to ensure transparency, accountability, and independent verification.

- Chambers v. NASCO, Inc., 501 U.S. 32 (1991)
- Zubulake v. UBS Warburg LLC, 220 F.R.D. 212 (S.D.N.Y. 2003) Establishes standards for electronic evidence preservation and disclosure56.

ENTRY INTO THE OFFICIAL RECORD

This filing is entered into the official record of the relevant agency and is intended to serve as a permanent, reviewable, and enforceable component of all related proceedings, investigations, and appeals.

- United States v. Nixon, 418 U.S. 683 (1974)
- EEOC v. Shell Oil Co., 466 U.S. 54 (1984)

Constitutional Protections and Expanded Rights Statements with Case Law References

INVOCATION OF CONSTITUTIONAL DUE PROCESS

This submission expressly invokes the protections of the Due Process Clause of the Fifth and Fourteenth Amendments, demanding fair notice, impartial adjudication, and meaningful opportunity to be heard in all proceedings arising from these facts.

Relevant Case Law:

- Mathews v. Eldridge, 424 U.S. 319 (1976) Establishes the balancing test for procedural due process protections.
- Goldberg v. Kelly, 397 U.S. 254 (1970) Affirms the right to a hearing before deprivation of certain benefits.

ASSERTION OF EQUAL PROTECTION AND ANTI-RETALIATION RIGHTS

All actions and omissions described herein are challenged as violations of the Equal Protection Clause and federal anti-retaliation statutes, with a demand for strict scrutiny of any disparate treatment or adverse action based on protected status or activity.

Relevant Case Law:

- Washington v. Davis, 426 U.S. 229 (1976) Defines standards for proving equal protection violations.
- Burlington Northern & Santa Fe Railway Co. v. White, 548 U.S. 53 (2006) Clarifies protections against workplace retaliation.

RESERVATION OF ALL CONSTITUTIONAL AND STATUTORY REMEDIES

The undersigned reserves all rights and remedies under the United States Constitution, including but not limited to the First, Fifth, and Fourteenth Amendments, as well as all statutory protections afforded by the ADA, FMLA, and related laws.

Relevant Case Law:

- Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984) Affirms deference to statutory protections and agency interpretations.
- Tennessee v. Lane, 541 U.S. 509 (2004) Upholds ADA protections as constitutional rights.

DEMAND FOR FEDERAL OVERSIGHT AND JUDICIAL REVIEW

This matter is submitted with a formal demand for federal oversight, judicial review, and, if necessary, intervention by the courts to vindicate constitutional rights and prevent further deprivation of liberty, property, or due process.

Relevant Case Law:

- Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803) Establishes judicial review as a fundamental principle.
- Goldsmith v. City of Atmore, 996 F.3d 1157 (11th Cir. 2021) Supports federal court intervention to protect constitutional rights.

References

1 Fed. R. Civ. P. 11 - 2 United States v. Alvarez, 567 U.S. 709 (2012) - 3 ESIGN Act, 15 U.S.C. § 7001 - 4 United States v. Jones, 565 U.S. 400 (2012) - 5 Chambers v. NASCO, Inc., 501 U.S. 32 (1991) - 6 Zubulake v. UBS Warburg LLC, 220 F.R.D. 212 (S.D.N.Y. 2003) - 7 United States v. Nixon, 418 U.S. 683 (1974) - 8 EEOC v. Shell Oil Co., 466 U.S. 54 (1984) - Mathews v. Eldridge, 424 U.S. 319 (1976) - Goldberg v. Kelly, 397 U.S. 254 (1970) - Washington v. Davis, 426 U.S. 229 (1976) - Burlington Northern & Santa Fe Railway Co. v. White, 548 U.S. 53 (2006) - Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984) - Tennessee v. Lane, 541 U.S. 509 (2004) - Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803) - Goldsmith v. City of Atmore, 996 F.3d 1157 (11th Cir. 2021)

With respect and hope, /s/ Thomas D. Coates Thomas D. Coates tdcoates@gmail.com | (757) 374-3539 Dated: June 11, 2025

Attachments:

(See main document for full exhibit list and supporting materials)

Cross-Agency Notification:

This matter has been formally noticed to the following agencies and organizations:

- U.S. Department of Justice (DOJ) Civil Rights Division
- U.S. Department of Labor (DOL) Wage and Hour Division
- Virginia Employment Commission (VEC)
- Office of the Inspector General (EEOC and DOL)
- Social Security Administration (SSA)
- MetLife (Disability Insurer)
- Governor's Office, Commonwealth of Virginia
- Selected national advocacy groups (e.g., ACLU, NDRN, Public Justice)

This submission constitutes Part A of a two-part memorialization and statutory reconsideration of both new and updated evidence relevant to Cox Communications' April 2025 Position Statement and all associated representations, system transactions, and correspondence.

Part B, forthcoming, will provide a comprehensive analysis of payroll records, the interaction of payroll with government reporting, and the impact on the IRS, Social Security Administration, Virginia Employment Commission, and the Department of Labor Wage and Hour Division.

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- XV. Violations: Addendum: Executive Knowledge, Fiduciary Breach, and the Interwoven Evidentiary Chain [Not found in content]
- XVI. Protected Activity Chronology and Reporting Digest
- XVII. Certification and Digital Endorsement
- XVIII. Service Attestation

I. Introduction and Docketing Request

This motion and its annexes are submitted for immediate transmittal and coordinated review by the U.S. Department of Labor, U.S. Department of Justice, Virginia Office of the State Inspector General, and the Office of the Governor of Virginia, as well as any other oversight body with statutory interest in the matters described herein.

II. Material Assertions and Representations at Issue

This motion concerns not only material statements submitted by Respondent's counsel in Cox's April 2025 position statement to the EEOC, but also all related factual assertions, representations, and communications made by Cox's principals, agents, and HR personnel in any form—including but not limited to:

- Position statements and supplemental filings submitted to the EEOC or other agencies;
- Emails and written correspondence by supervisors, HR, or management;
- Teams, Slack, or other internal chat communications relevant to leave, accommodation, or discipline;
- Workday, payroll, or HR system input and audit logs;
- Internal notes, digital logs, and records of meetings or corrective actions;
- Any other documented or system-captured assertion or representation made by Cox or its agents regarding Claimant's employment, leave, discipline, or accommodation.

These statements are contradicted by direct documentary evidence and constitute perjury, retaliation, and ongoing bad faith. The Claimant specifically objects to any attempt by Respondent to "fix" or disclaim only the position statement while leaving other false or misleading assertions uncorrected in the broader record. The evidentiary chain is intentionally intertwined: any attempt to remove or alter one "link" (e.g., the position statement) will not defeat the integrity of the overall record, as other communications and system records independently corroborate the violations and inconsistencies at issue.

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III. Statutory and Procedural Foundation

This motion is submitted pursuant to:

- 42 U.S.C. § 12117(a) (ADA enforcement via Title VII procedures)
- 42 U.S.C. § 2000e-5(b) and (f)(1) (EEOC investigative authority and enforcement)
- 29 C.F.R. § 1601.15(c) and § 1601.18 (submission and use of party statements as evidence)
- Federal Rule of Evidence 801(d)(2) (statements of an opposing party as non-hearsay)
- EEOC-DOL-DOJ MOU (2018, revised 2022) for collaborative investigation and systemic referral

The Commission is empowered to preserve and memorialize such statements as binding admissions, subject to cross-agency evidentiary review.

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IV. Relief Sought

The Claimant respectfully requests that the EEOC and cross-agency recipients:

- Enter this motion and the cited material statement into the permanent record for EEOC Charge No. 12K-2025-00001;
- Formally memorialize the quoted material statement as a material representation in the record, subject to Rule 801(d)(2) admissions;
- Order Cox Communications to admit, clarify, or deny this material statement within 10 business days, or else treat it as an evidentiary admission for all investigative and judicial purposes;
- Refer any systemic findings arising from this statement to DOJ Civil Rights Division and DOL WHD;
- Distribute a certified copy of this motion and the quoted material statement to all relevant oversight agencies for synchronized review.

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V. Material Statements Submitted by Respondent's Counsel are Contradicted by Direct Documentary Evidence

#	Infraction	Individuals/Princi pals	Records & Systems	Forensic Data/Discovery Actions	Testimony/Demand
1	Unsigned, Unverified Submission (29 C.F.R. § 1601.18(c))	Justin Miles (Outside Counsel), Kia Painter (Chief Compliance Officer), Lakita Gaines (HR Lead)	Final position statement file; Submission logs (EEOC portal, email); Internal approval emails	Extract digital signature metadata; Pull all email chains approving submission; Identify all contributors and reviewers in document properties; Preserve all drafts and transmission records	Demand sworn affidavit from Justin Miles and Kia Painter attesting to authorship, review, and certification of all factual assertions.
2	Absence of Sworn Declarations	Kia Painter, Lakita Gaines, Inelyz Martinez, Donte Holmes	HR case files; Internal investigation notes; List of all managers/decisi on-makers referenced	Identify all factual claims lacking sworn support; Extract HR case file sign-off logs; Pull all internal emails referencing 'affidavit' or 'declaration'; List all witnesses for subpoena	Demand sworn declarations from each named principal for every material assertion made.
3	Verbal Conversation Claims Unsubstantiated	HR Manager (assigned), Kia Painter, Donte Holmes	Phone logs, call records (VOIP, Teams/Zoom), Email follow-ups, HRIS notes	Subpoena call logs for all dates referenced; Extract Teams/Zoom/Slack call records; Forensically review HRIS notes for edits/creation dates; Demand production of all contemporaneous documentation	Each HR principal must provide a sworn statement with date/time, attendees, and substance of every

					referenced conversation.
4	Contradictory Payroll Statements	Payroll Administrator, MetLife Coordinator, Ursula Rogers	Payroll system logs (Workday, ADP), Paystubs, IRS filings, MetLife STD claim records	Pull all paystubs and payroll logs for relevant periods; Compare payroll to MetLife claim periods; Extract IRS/SSA reporting for same intervals; Forensically analyze 'Stay Pay' entries and zeroed-out pay	Sworn payroll administrator and MetLife coordinator testimony on all entries, discrepancies, and reporting.
5	Fabricated Access/Return Narrative	Jennifer Melton, Inelyz Martinez	Physician RTW letters, ADA accommodation forms, HRIS access logs	Extract and compare all RTW documentation; Audit HRIS access block/restore records; Subpoena physician communications	Testimony from HR and medical contacts on RTW instructions, access restoration, and timeline.
6	Improper Footnotes to Disclaim Responsibility	Justin Miles (author), Cox Legal Team	Drafts of position statement, Email chains about footnotes, Internal legal review notes	Demand production of all drafts and revision history; Identify all contributors to disclaimers; Subpoena legal team for rationale behind disclaimers	Sworn affidavit from each legal drafter as to accuracy and intent of disclaimers.
7	Misrepresentation of Performance Records	Donte Holmes, Scorecard Administrator, Performance Coach	Scorecard logs, Performance review emails, Accommodation request records	Pull all performance review drafts and final versions; Audit for edits after accommodation requests; Compare timeline to ADA/FMLA requests	Sworn testimony from all reviewers on content, timing, and knowledge of accommodations.
8	Disregard of Disability Status in Harassment Claims	Supervisors, HR Compliance, Jennifer Melton	Medical records, Email notifications, HR	Extract all emails referencing disability or ADA; Audit HR complaint system for entries and responses; Subpoena supervisors for	Testimony from all involved on knowledge of disability and steps

			complaint logs	knowledge and response	taken.
9	Absence of Internal Investigation or Documentation	Lakita Gaines, Internal HR Compliance Officer, Ursula Rogers	Internal investigation files, Interview notes, HRIS audit logs	Demand all investigation notes and logs; Subpoena all interview participants; Forensically review HRIS for undeclared edits	Sworn affidavits from all compliance officers regarding investigation scope and findings.
10	Improper Grouping of EEOC Matters	Alexander Perez (EEOC), Cox Legal Team	EEOC charge files, Internal legal memos, Correspondenc e with EEOC	Pull all correspondence regarding charge grouping; Audit EEOC and Cox records for consolidation discussions; Identify all legal team members involved	Sworn testimony from Perez and Cox legal on rationale, process, and due process compliance.

All individuals above are required to:

- Preserve and produce all emails, internal chat logs (Teams, Slack), Workday/HRIS records, and any documentation relating to leave, accommodation, payroll, discipline, compliance, or any matter relevant to this proceeding;
- Provide sworn affidavits or be available for deposition/interview regarding their knowledge, decisions, and participation in the creation, approval, or dissemination of the Cox April 2025 Position Statement and any related communications, system entries, or actions impacting the Complainant or this case;
- Correct the record for any false, misleading, or unsupported statements for which they were responsible or had knowledge, whether in the position statement or any other form or forum;
- Comply with all legal, regulatory, and ethical obligations to ensure the accuracy, integrity, and preservation of the record for EEOC, DOL, DOJ, and judicial review.

Failure to comply will be memorialized as non-response, subject to adverse inference, sanctions, and referral for further agency or judicial action. This memorialization is ongoing and encompasses all conduct, statements, and evidence relevant to these proceedings, not limited to the position statement alone.

LEGAL NOTICE OF INDIVIDUAL RESPONSIBILITY AND ACCOUNTABILITY

The following individuals are hereby formally memorialized as principals, agents, or respondents for all purposes of this record. Each has, at various times and in various forms:

- Entered data, made changes, or taken action in Cox's HR, payroll, benefits, or compliance systems;
- Sent, received, or been copied on emails, internal communications, or system notes relevant to leave, accommodation, payroll, discipline, or

- compliance;
- Made, repeated, or allowed false statements, unsupported assertions, or omissions in the April 2025 Position Statement, related filings, or other documented communications;
- Failed to intervene, report, or correct known or suspected violations of EEOC statutes, ADA, FMLA, or other applicable laws, thereby enabling such violations to persist or propagate.

Each individual named below is subject to:

- Formal demand for sworn affidavit, deposition, or interview regarding their knowledge, actions, and participation in any and all matters related to this case, including but not limited to the position statement, system entries, and all communications or decisions impacting the Complainant;
- Requests for clarification and correction of any disputed or unsupported facts or statements for which they were responsible or had knowledge;
- Personal and professional exposure for perjury, bad faith, breach of fiduciary duty, or failure to correct or report known violations, as determined by the EEOC, DOL, DOJ, or any court or oversight agency;
- An ongoing duty to preserve all records, communications, and system data relevant to this matter, regardless of format or medium, including any future or supplemental actions taken in relation to the Complainant or this case.

Any attempt by these individuals to disclaim, fix, or distance themselves from the position statement, related communications, or system actions will not defeat the integrity of the memorialized record, as their knowledge, participation, and actions are independently corroborated by system logs, emails, and documentary evidence. This memorialization is not limited to the position statement, but extends to all relevant conduct, past, present, and future, that may impact the rights of the Complainant or the integrity of the proceedings.

MEMORIALIZED PRINCIPALS AND RESPONDENTS COX COMMUNICATIONS

#	Name	Title	Role/Context
1	Lakita Gaines	HR Business Partner (CCI-Atlanta)	Included in several email threads regarding Complainant's accommodations and return-to-work status; copied on EEOC-related correspondence; linked to Workday coordination and employee relations.
2	Jennifer Melton	Senior Manager, Employee Relations & Compliance (CCI-Atlanta)	Central in communications regarding ADA accommodations, return-to-work status, documentation demands, and Open Enrollment issues. Her Nov. 20, 2024 email initiated a last-minute RTW letter demand, leading to significant procedural conflict.
3	Keith Wilson	(Unconfirmed, but involved in Employee Relations or HR Operations)	Regular recipient of ADA and return-to-work correspondence. Referenced in MetLife coordination and ESC (Employee Service

			Center) exchanges.
4	Kia Painter	Chief People Officer / Executive Leadership HR Oversight (Cox Enterprises, Inc.)	Subject of high-level disclosures regarding ADA compliance failures, fiduciary responsibility issues, and ethical reporting obligations. Previously identified for SEC, CEI (Cox Enterprises Inc.), and legal oversight relevance.
5	Ursula Rogers	HR Manager or Advisor (Title inferred from correspondence context)	Referenced in oversight, coordination with MetLife, and ADA process execution. May have been involved in benefits and system-level HR data handling.
6	Azariah Workman	Supervisor or Frontline Manager	Played a role in sending Complainant home due to chest pain on June 28, 2024. Key witness in workers compensation timeline and early ADA health interactions.
7	Donte Holmes	Supervisor (CCI-Atlanta)	Immediate supervisor during key leave and accommodation events. Acknowledged out-of-office notices, and confirmed certain occurrences were logged as excused.
8	Sarah DellaVecchio	Manager or HR Liaison (CCI-Virginia)	Included in attendance tracking and Workday communications. Mentioned in context of reports and accommodation coordination.
9	Chauntriss Herring	Unspecified, likely involved in Benefits or HR Compliance	Referenced in previous correspondence threads related to benefits eligibility and Workday permissions.
10	Rachel Smith	Possibly Benefits or Legal/HR Liaison	Occasionally CCd in formal letters involving leave policy and disability-related case progression.

All individuals above are required to:

- Preserve and produce all emails, internal chat logs (Teams, Slack), Workday/HRIS records, and any documentation relating to leave, accommodation, payroll, discipline, compliance, or any matter relevant to this proceeding;
- Provide sworn affidavits or be available for deposition/interview regarding their knowledge, decisions, and participation in the creation, approval, or dissemination of the Cox April 2025 Position Statement and any related communications, system entries, or actions impacting the Complainant or

- this case:
- Correct the record for any false, misleading, or unsupported statements for which they were responsible or had knowledge, whether in the position statement or any other form or forum;
- Comply with all legal, regulatory, and ethical obligations to ensure the accuracy, integrity, and preservation of the record for EEOC, DOL, DOJ, and judicial review.

Failure to comply will be memorialized as non-response, subject to adverse inference, sanctions, and referral for further agency or judicial action. This memorialization is ongoing and encompasses all conduct, statements, and evidence relevant to these proceedings, not limited to the position statement alone.

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VI. Narrative of Retaliation and Constructive Obstruction: The Azariah Workman Event June 28, 2024

Preservation and Legal Notification:

This event and analysis are hereby entered into the permanent record for EEOC Charge No. 12K-2025-00001 and all cross-agency referrals. All parties, including Cox Communications, its agents, and oversight agencies, are notified of their obligation to preserve all related payroll, system, and correspondence records for independent review and audit. Any attempt to amend, disclaim, or distance from these actions will not defeat the integrity of the preserved record, as the evidentiary chain is independently corroborated by system logs, emails, and contemporaneous documentation.

I. Factual Recitation

On June 28, 2024, Thomas D. Coates requested a confidential meeting with his manager, Azariah Workman, to discuss emergent medical concerns related to exacerbated cardiac symptoms and acute stress resulting from his son's illness. This request was made with the expectation of confidentiality, consistent with ADA mandates that protect medical disclosures.

Despite the private nature of the request, Ms. Workman summoned multiple individuals, including two of Coates's direct supervisors and a third manager who was not assigned to him nor previously involved in his supervision. This third party had no legitimate role in the matter and no permissible reason under EEOC confidentiality standards to be privy to sensitive medical discussions.

During the meeting, Coates disclosed that he was experiencing chest pains and acute stress. Upon hearing this, Ms. Workman acknowledged the seriousness of the symptoms and verbally stated that she was granting him two paid medical days off to seek care. She told him:

"I'm going to give you two days of paid medical leave so that you can go to the doctor and get yourself taken care of."

However, within hours of that interaction, Ms. Workman accessed the Workday system and suspended Coates's pay, a decision also reflected in PeopleSoft and Workday audit logs. No additional medical information had been submitted to justify this modification, and no new events occurred that would explain this shift. Importantly, Coates was not notified in advance nor given an opportunity to respond.

Furthermore, within 72 hours, Ms. Workman initiated a negative performance evaluation, directly following his disclosure and request for medical

accommodation—an evaluation that appears backdated in the system and was created after she was informed of his protected medical condition.

He was not remunerated again for nearly 30 days, despite repeated efforts to resolve the issue with HR, supervisors, and internal support systems.

II. Human Impact and Statutory Protections Violated

What Should Have Occurred	What Actually Occurred
Under 42 U.S.C. 12112(d)(4)(C) (ADA confidentiality), only individuals involved in HR or with direct medical accommodation responsibilities should have been present during any discussion of medical conditions.	A confidential medical disclosure was made in a compromised environment.
Under 29 C.F.R. 1630.14(c), medical information must be kept confidential and separate from personnel files, and not shared without direct necessity.	A verbal accommodation (2 days of paid medical leave) was given but reversed within hours via a payroll intervention.
Under 29 C.F.R. 825.302 & 825.303 (FMLA), when an employee discloses a serious health condition, the employer must facilitate—not obstruct—medical leave requests.	Pay was cut off immediately following the disclosure of a disability-related health crisis.
Under 29 C.F.R. 1602.14, adverse action following the initiation of an accommodation or leave request triggers a presumption of retaliation, which must be rebutted with objective evidence.	A negative evaluation was initiated while the employee was under medical distress and after invoking ADA and FMLA protections.

III. Statutory Violations Identified

- Retaliation under ADA Title I: 42 U.S.C. 12203(a) prohibits retaliation against an individual for requesting reasonable accommodations or reporting discrimination.
- Constructive Obstruction of Medical Leave (FMLA): 29 U.S.C. 2615(a)(1)-(2) prohibits employers from interfering with or retaliating against the use of FMLA-protected leave. Chest pain and physician care are triggers under serious health condition definitions.
- Violation of EEOC Confidentiality Standards: 29 C.F.R. 1630.14(c)(1)(i) prohibits the disclosure of confidential medical information to unauthorized personnel.
- Failure to Engage in Good-Faith Interactive Process: EEOC Guidance mandates employers to actively assist in accommodation after disclosure. Instead, the employer took punitive action.

- Constructive Discharge and Payroll Withholding: Cutting pay following a protected medical disclosure, without notice or process, constitutes constructive interference under 29 C.F.R. 1602.14 and can rise to constructive discharge if continued.
- Bad Faith Retaliatory Documentation: The creation of an unprompted negative evaluation, temporally adjacent to a medical disclosure, demonstrates retaliatory animus and violates 42 U.S.C. 2000e-3(a).

IV. Escalating Retaliation After Protected Health Disclosure: A Pattern Confirmed by Internal Emails and External Findings

Cox Position Statement Claim	Contradicted By
The position statement asserts that Cox worked cooperatively with Mr. Coates to facilitate his return.	June 28 incident where a medical disclosure was immediately met with loss of pay and negative evaluation.
Cox claims Mr. Coates never presented documentation supporting his claims.	Real-time, verbal disclosure of medical crisis followed by payroll action before any documentation could be submitted.
Cox claims retaliation claims are unsupported.	The temporal proximity of disclosure, retaliatory payroll action, and bad evaluation are classic but-for causation under EEOC Enforcement Guidance.
Performance evaluation began after disclosure, not as part of routine process.	System records and audit logs confirm timing and sequence.

Strategic Legal Containment: Statutory Violations, Procedural Failures, and Imminent Enforcement Risk

Under the Americans with Disabilities Act (ADA), employers are required to engage in an interactive process and provide reasonable accommodations unless doing so would impose an undue hardship. Cox Communications' actions violated core provisions of 42 U.S.C. § 12112(b)(5)(A), which prohibits denying employment opportunities based on a refusal to accommodate. Their failure to engage meaningfully in dialogue, as required by 29 C.F.R. § 1630.2(o)(3), coupled with coercive leave imposition and eventual termination, bypassed both federal standards and EEOC Enforcement Guidance No. 915.002 (2002), which mandates individualized assessment of accommodation needs.

These actions do not merely constitute retaliation—they rise to the level of constructive discharge under Green v. Brennan, 578 U.S. 547 (2016), when viewed in light of temporal proximity, escalating pretext, and emotional coercion. When an employee is pushed out through intolerable working conditions following protected activity, this becomes a violation of constitutional due process rights tied to employment, as recognized in Cleveland Bd. of Educ. v. Loudermill, 470 U.S. 532 (1985).

Cox's expected defenses—alleging poor performance, no formal accommodation request, or voluntary resignation—are preemptively refuted through time-stamped documentation, contemporaneous emails, STD filings with MetLife, and third-party involvement (including the DOJ Civil Rights Division). A clear visual matrix tracking protected disclosures, denials, supervisor actions, and termination dates underscores the chain of causation.

The EEOC now faces a credibility convergence: it cannot sustain Cox's narrative while simultaneously ignoring its own reversal of short-term disability denial or its duty to investigate under Title I. If Cox's statements are taken as truthful, then the EEOC must explain why it ignored MetLife's findings, ADA regulations, and internal reversals that contradict Cox's position.

Federal oversight by the DOJ, DOL Wage and Hour Division, and systemic enforcement units is fully justified at this point. Continued inaction would imply institutional neglect—not just by Cox, but by the agencies tasked with ensuring accountability.

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Compliance Heatmap: Retaliation & ADA Failure at a Glance

Phase / Event	Legal Standard	Cox Action	Violation Triggered	Agency/Statute Breached
Accommodation Request Submitted	42 U.S.C. § 12112(b)(5)(A)	Ignored for multiple days	Failure to accommodate	EEOC, ADA Title I
STD Filed with MetLife	ADA + ERISA fiduciary duty (29 CFR § 2560.503-1)	Blocked / discouraged participation	Interference + failure to engage	DOL, ERISA, ADA
Managerial Emails Emerge	EEOC Enforcement Guidance No. 915.002	Show active avoidance and delay tactics	Pattern of pretext + retaliation	EEOC, ADA
Pay Cut While Awaiting Response	29 C.F.R. § 1630.2(o)(3)	Removed from payroll, no hearing	Constructive discharge, lack of process	EEOC, Due Process Clause
Outreach to DOJ/EEOC Initiated	Protected Activity (42 U.S.C. § 12203)	Terminated within 24 hours	Direct retaliation after protected act	EEOC, DOJ Civil Rights Division
EEOC Accepts Unverified Statement	29 CFR § 1601.15 & EEOC Intake Manual	No affidavit, no witness testimony	Procedural abdication of factfinding	EEOC Systemic Unit

VEC Reversal Confirms Medical SeparationUIPL 04-01; Va. Code § 60.2-612Conflicts with Cox's resignation claimProves constructive discharge narrativeVEC, DOL, EEO	
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IV. Pretextual Conduct and Contradictions in the Record

Cox Position Statement Claim	Contradicted By
The position statement asserts that Cox "worked cooperatively with Mr. Coates to facilitate his return."	June 28 incident where a medical disclosure was immediately met with loss of pay and negative evaluation.
Cox claims "Mr. Coates never presented documentation supporting his claims."	Real-time, verbal disclosure of medical crisis followed by payroll action before any documentation could be submitted.
Cox claims "retaliation claims are unsupported."	The temporal proximity of disclosure, retaliatory payroll action, and bad evaluation are classic "but-for" causation under EEOC Enforcement Guidance.
Performance evaluation began after disclosure, not as part of routine process.	System records and audit logs confirm timing and sequence.

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Ongoing Timeline, Record Falsification, and Bad Faith

This timeline meticulously chronicles a persistent pattern of misconduct and alleged actions, detailing specific events and communications that unequivocally demonstrate a profound disregard for the Complainant's rights and a manifest absence of good faith.

- June 19, 2024: Complainant formally requests medical leave from his supervisor, Donte Holmes. The supervisor subsequently provides instructions regarding FMLA and medical leave via the Employee Service Center (ESC).

 Proof: Contemporaneous email/text correspondence and Workday logs.
- June 20, 2024: The supervisor, with direct assistance from HR Director Azariah Workman (as evidenced by Workday system logs), generates and issues a negative evaluation and written warning. This action occurs immediately subsequent to the protected leave request.

Proof: Workday system logs.

- June 25, 2024: Complainant formally requests the correction and removal of the improper warning from HR and management. Proof: Email/ticket submitted to HR.
- July-August 2024: Complainant continues to pursue resolution, submitting additional requests and tickets to HR. Cox/HR fails to
 act promptly or to provide written confirmation of the warning's removal.
 Proof: HR ticket logs and email chains.
- September 2024: Despite numerous requests and HR's eventual acknowledgment that the warning should have been rescinded, the written warning remains in the Complainant's record and is referenced by Cox in ongoing proceedings and position statements.

 Proof: Email chains, HR ticket logs, and screenshots.
- June 27, 2024: Azariah Workman provides the "Physician Accommodation Request" form, yet subsequently alleges that the process
 was not adhered to or that documentation was deficient.
 Proof: Workman's own system logs.
- July 1–18, 2024: Complainant repeatedly seeks resolution for outstanding payroll, leave, and accommodation issues. Workman's responses during this period are characterized by delay, vagueness, and a lack of substantive engagement.

 Proof: Documented correspondence.
- July 9, 2024: Workman acknowledges receipt of the accommodation request but merely offers to "discuss the details further when
 you return from your leave in September". This constitutes a deliberate stalling tactic, directly contravening the ADA's requirement
 for a prompt interactive process.
 - Proof: Email correspondence.
- July 11, 2024: Workman asserts that Complainant unilaterally closed his own leave case and is "not on an an approved leave". This assertion disregards the underlying actions and Workman's direct role in obstructing the accommodation process.

 Proof: Comparison of Workman's statements versus Complainant's documented record.
- **July 18, 2024:** Complainant meticulously documents a comprehensive list of unresolved issues, including payroll discrepancies, system access impediments, and failures in ADA/FMLA compliance. Workman's continued lack of substantive response provides further evidence of ongoing bad faith.
 - Proof: Complainant's detailed documentation.
- Late July-September 2024: Despite repeated outreach efforts, Workman and HR fail to correct records, restore pay, or rectify ADA/FMLA violations. The written warning, despite having been rescinded, remains in the record, and pay cessation is directly traceable to Workman's actions.
 - Proof: Correspondence and payroll records.

Legal & Evidentiary Implications:

• **Direct Action:** The temporal proximity—less than 24 hours—between the Complainant's protected activity (request for leave) and the adverse employment action (issuance of a written warning) constitutes classic "smoking gun" evidence of action under 42 U.S.C.

- § 12203(a) and EEOC Enforcement Guidance.
- Perjury and False Statements: Cox's position statement falsely claims that the warning predated the leave request. Documentary
 evidence incontrovertibly proves the inverse, thereby constituting perjury under 18 U.S.C. § 1001 and providing grounds for an
 adverse inference.
- Ongoing Bad Faith and Record Falsification: Cox's persistent failure to remove the rescinded warning, notwithstanding HR's prior confirmation of its removal, signifies ongoing bad faith and potentially spoliation of evidence.
- Continued Misrepresentation: Cox's sustained reference to the rescinded warning in agency filings, subsequent to being formally notified of its removal, demonstrates knowing misrepresentation and may constitute obstruction of justice.

Paradigm Shift – How This Changes the Legal Landscape:

- All subsequent statements, policies, and denials issued by Cox Communications must be critically re-evaluated in light of this initial, documented act of action and bad faith. Every assertion of "policy compliance" or "good faith" is inherently tainted by Ms.
 Workman's central role in the foundational violation.
- **Perjury and False Statements**: Ms. Workman's and Cox's continued misrepresentations to the EEOC are not mere oversights; they are deliberate, knowing falsehoods subject to legal sanction and adverse inference.
- Systemic Failure: The cumulative correspondence and evidentiary record reveal not isolated errors, but rather a systemic pattern of action, undue delay, and concerted efforts to conceal pertinent information.
- Notice to EEOC and All Agencies: The EEOC's failure to adequately address these documented issues, despite having been
 provided with compelling evidence months prior, itself represents a procedural deficiency and fully justifies the Complainant's
 demand for sworn affidavits, cross-examination, and comprehensive cross-agency enforcement.

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Pattern of Retaliation and Pretext:

Multiple emails show that Cox supervisors and HR did not even acknowledge my accommodation request for days, then terminated me within hours of my notice to contact the U.S. Department of Justice.

VII. Material Contradictions: MetLife File vs. Cox Position Statement

MetLife Disability File / Complainant's Record	Cox Position Statement Claim	Contradiction / Legal Basis
Your disability claim was received on May 28, 2024 and approved for the period June 3, 2024 through July 1, 2024. (MetLife Letter, June 3, 2024)	No leave or accommodation was requested for absences in June 2024. (Position Statement, April 11, 2025, p.2)	Contradicts assertion of no request. 29 C.F.R. § 1630.9
Employer contact: HR was notified of your claim on May 29, 2024. (MetLife File, May 29, 2024)	Unaware of any disability claim or need for accommodation prior to disciplinary action. (Position Statement, April 11, 2025, p.3)	Contradicts claim of lack of notice. 42 U.S.C. § 12112(b)(5)(A)
Medical documentation received and accepted June 2, 2024. (MetLife File, June 2, 2024)	No medical documentation was ever provided to support absences. (Position Statement, April 11, 2025, p.4)	Contradicts assertion. 29 C.F.R. § 825.302(c)
Approved for Short-Term Disability (STD) benefits for June 3 - July 1, 2024. (MetLife Letter, June 3, 2024)	Absent without leave and subject to corrective action for the same period. (Position Statement, April 11, 2025, p.5)	Contradicts payroll/discipline records. 29 C.F.R. § 825.220
Employer failed to respond to MetLife's request for additional information on June 5, 2024. (MetLife File, June 5, 2024)	Fully cooperated with all disability claims and requests. (Position Statement, April 11, 2025, p.6)	Demonstrates lack of cooperation. 29 C.F.R. § 1630.2(0)(3)
Claim approved based on medical necessity and documentation provided. (MetLife Letter, June 3, 2024)	No documentation was ever provided. (Position Statement, April 11, 2025, p.4)	Contradicts claim. 42 U.S.C. § 12112(b)(5)(A)
Disability claim covers all absences from June 3, 2024 through July 1, 2024. (MetLife File, July 1, 2024)	Absences in June were unexcused and subject to corrective action. (Position Statement, April 11, 2025, p.5)	Contradicts basis for discipline. 29 C.F.R. § 825.220(c)
Return-to-work date set for July 2, 2024. (MetLife Letter, July 1, 2024)	No expected return-to-work date communicated. (Position Statement, April 11, 2025, p.6)	Contradicts claim. 29 C.F.R. § 1630.2(0)(3)

Employee notified of right to appeal any denial or reduction in benefits. (MetLife Letter, July 1, 2024)	No rights or benefits denied. (Position Statement, April 11, 2025, p.7)	Contradicts assertion. 29 C.F.R. § 825.300
Employer failed to provide requested payroll information to MetLife. (MetLife File, June 10, 2024)	All necessary payroll and employment information provided. (Position Statement, April 11, 2025, p.8)	Contradicts claim. 29 C.F.R. § 825.500
STD benefit payments issued for June 3 - July 1, 2024. (MetLife File, July 1, 2024)	Not entitled to any paid leave or disability benefits. (Position Statement, April 11, 2025, p.9)	Contradicts payroll records. 29 C.F.R. § 825.215
Employer delayed response to MetLife's request for employment verification. (MetLife File, June 10, 2024)	Responded promptly to all requests. (Position Statement, April 11, 2025, p.10)	Contradicts MetLife's record. 29 C.F.R. § 825.300(b)
Claim file includes all medical and employment documentation required. (MetLife File, July 1, 2024)	No documentation was ever received. (Position Statement, April 11, 2025, p.11)	Contradicts claim. 29 C.F.R. § 1630.14(c)
MetLife notified employer of employee's protected status under ADA and FMLA. (MetLife File, June 3, 2024)	Unaware of any protected status or need for accommodation. (Position Statement, April 11, 2025, p.12)	Contradicts assertion. 42 U.S.C. § 12112(b)(5)(A)
Employee engaged in protected activity by filing a disability claim. (MetLife File, May 28, 2024)	No protected activity occurred prior to corrective action. (Position Statement, April 11, 2025, p.13)	Contradicts timeline. 29 C.F.R. § 1630.12
MetLife confirmed receipt of updated medical restrictions on October 22, 2024. Approved included phased return and remote work. (Exhibit J)	Cox did not receive any updated restrictions after the initial documentation. (SOP, p.29). Mr. Coates rejected all accommodations. (SOP, p.12)	Contradicts interactive process obligations. 29 C.F.R. § 1630.2(0)(3) Misrepresents acceptance. 42 U.S.C. § 12112(b)(5)(A)

Employee medically cleared to return with restrictions Nov. 21, 2024.	Mr. Coates never communicated readiness to return. (SOP, p.31)	False claim regarding communication. 29 C.F.R. § 1630.9(d)
Employer failed to respond to multiple coordination requests from MetLife.	Cox collaborated fully with MetLife.	Evidence of non-cooperation. 29 C.F.R. § 825.300(c)(1)
Pay inconsistencies noted and reported to MetLife.	All pay records were accurate and verified.	Contradiction over payroll truthfulness. 29 C.F.R. § 825.500(g)
Leave approved through July 1, 2024, and again through Nov. 20, 2024.	Leave was never officially approved for those dates.	Contradicts documentation and payments. 29 C.F.R. § 825.216(a)
Medical release submitted for Nov. 21, 2024 RTW.	Mr. Coates failed to submit timely RTW letter. (SOP, p.30)	Documented submission exists. 29 C.F.R. § 825.302(c)
No indication of voluntary resignation.	Employee voluntarily resigned by failing to return.	Misrepresents ADA/family leave protections. 29 C.F.R. § 825.220(b)
Employee status changed prior to appeal period expiration.	All employee rights and appeal periods were honored.	Due process breach. 29 C.F.R. § 825.300(d)(1)
System notes reflect delay in pay processing after June 28.	No delay in pay noted in system.	Evidence conflict, possible wage violation. 29 C.F.R. § 541.602(a)
Workday logs show adjustments made retroactively.	No retroactive changes occurred.	Log audit discrepancy. 29 C.F.R. § 516.6(a)(1)
Employer instructed MetLife to pause STD case review.	Cox had no role in STD decision-making.	Undermines impartiality. 29 C.F.R. § 825.308(b)(2)

Benefit enrollment prevented due to HR inaction.	Employee failed to enroll despite assistance.	Obstructive practices. 29 C.F.R. § 825.220(a)(2)
MetLife notified Cox of ADA coverage status.	Cox unaware of ADA-qualified condition.	Constructive notice ignored. 42 U.S.C. § 12112(b)(4)
System logs show benefit eligibility review delayed by Cox.	No delay occurred; employee failed to complete process.	Delay attributed incorrectly. 29 C.F.R. § 825.301(a)
Internal logs show repeated employee inquiries.	Mr. Coates made no attempt to contact HR after 7/1/24.	Misrepresentation of engagement. 29 C.F.R. § 825.302(c)
Short-term disability approval not reversed until August.	Mr. Coates was denied benefits in early July.	Contradictory benefit timing. 29 C.F.R. § 825.212(b)
Cox provided MetLife incorrect payroll data.	All payroll data was accurate and verified.	Contradiction. FLSA: 29 U.S.C. § 211(c)
Interactive process began July 2024.	Interactive process began in October.	Delayed engagement violates law. 29 C.F.R. § 1630.2(0)(3)
Case documented as 'medical leave' on July 1 in Workday.	July 1 was unauthorized absence.	Misclassification. 29 C.F.R. § 825.302(d)
No disciplinary action should occur while on STD.	Corrective action issued June 27 despite STD application.	Interference with leave rights. 29 C.F.R. § 825.220(c)
Physician documentation received and logged.	No valid medical documentation ever submitted.	Direct contradiction. 29 C.F.R. § 1630.14(c)

Accommodation request formally submitted Oct. 22.	Employee delayed request.	Fabricated delay. 29 C.F.R. § 1630.9
Pay halted June 28 with no written justification.	Employee resigned or did not return.	Payroll discontinuation as retaliation. FLSA § 206
MetLife confirmed disability due to cardiac condition.	No known disability confirmed.	Ignoring diagnosed condition. 42 U.S.C. § 12102(1)(A)
System flagged conflicting evaluations after leave discussion.	Evaluations unrelated to medical status.	Temporal retaliation. 29 C.F.R. § 1630.12(a)
Workday shows HR entries altered post-meeting on June 28.	No retroactive changes were made.	System alteration implicates retaliation. 29 C.F.R. § 825.500
Employee requested updated job functions.	Mr. Coates never inquired about duties.	Denial of interactive engagement. 29 C.F.R. § 1630.2(0)(3)
Final paycheck inconsistencies reported but not addressed.	All pay was correct.	Pay inquiry neglect. FLSA § 207(e)
Disability claim upheld despite Cox's lack of cooperation.	Cox fully cooperated.	Discrepancy noted by third party. 29 C.F.R. § 825.307(b)

VIII. Statutory and Regulatory Standards for Veracity and Evidentiary Support

This addendum is submitted in accordance with the requirements of the U.S. Equal Employment Opportunity Commission (EEOC), federal law, and recognized standards of legal practice. The following statutes, regulations, and agency guidance mandate that all factual statements, legal arguments,

and position statements submitted in administrative and judicial proceedings must be accurate, succinct, and supported by evidence. Unsupported assertions, speculation, or mischaracterizations are improper and should be stricken or disregarded.

EEOC Standards and Guidance:

EEOC Quality Practices for Effective Position Statements

EEOC Enforcement Guidance (29 C.F.R. § 1601.15)

EEOC Federal Sector Management Directive 110 (MD-110)

Other Federal Agency Standards:

U.S. Department of Labor (DOL): 5 U.S.C. § 556(d) (Administrative Procedure Act)

U.S. Department of Justice (DOJ) ADA Investigations

Federal Rules of Civil Procedure, Rule 56 (Summary Judgment):

Fed. R. Civ. P. 56(c)

Professional Standards and Best Practices:

National Association of Disability Representatives (NADR) - Code of Conduct

American Bar Association (ABA) Model Rule 3.3

The evidence and documentation provided are not simply procedural, they are deeply personal. They reflect years of perseverance, repeated attempts to seek redress through every available channel, and the lived consequences of institutional inaction. This submission is designed to make the scope and seriousness of these violations unmistakable, and to ensure that every reviewer, whether legal, regulatory, or public, can see not only the harm but the imperative for remedy.

Comprehensive Personnel File and Performance Reviews: Demonstrates a consistent record of satisfactory or commendable performance, with no legitimate basis for adverse action.

Medical Documentation and Disability Certification: Includes all physician letters, FMLA/ADA forms, and MetLife approvals, confirming both the existence of a qualifying disability and full compliance with all procedural requirements.

Chronological Email and Written Communication Log: A curated set of emails and written correspondence with HR, supervisors, MetLife, and agency representatives, documenting every request, escalation, and denial.

Complete Company Policies and Employee Handbook: Official policies on ADA, FMLA, anti-retaliation, payroll, and leave, juxtaposed with evidence of their violation or disregard.

Sworn Witness Statements: Signed declarations from coworkers and other witnesses attesting to observed discrimination, retaliation, or procedural failures.

Payroll and Benefits Records: Pay stubs, commission records, and benefits statements showing delays, discrepancies, or interruptions directly tied to protected activity.

Master Timeline of Events: A single, annotated chronology mapping every key action, request, response, and adverse event, cross-referenced to supporting exhibits.

Internal HR Complaints and Ethics Reports: All internal complaints and ethics filings, with evidence of non-response or perfunctory dismissal.

Agency Correspondence and Parallel Investigation Notices: Letters and emails to and from the EEOC, VEC, DOL, MetLife, and other agencies, documenting both your efforts and their responses or lack thereof.

Evidence of Pattern or Pretext: Documentation of similar cases, prior complaints, or shifting explanations by Cox, establishing a broader pattern of conduct.

Advocacy and Social Impact Materials: A 'Why This Case Matters' summary, any media coverage, and materials prepared for advocacy or public awareness campaigns.

Each exhibit is referenced in the main body and indexed for immediate review. The cumulative effect is not only to prove the violations but to make denial impossible. This is a record designed to command attention, demand justice, and withstand scrutiny from any forum—legal, regulatory, or public.

IMMINENT SUBMISSION OF CRUCIAL EVIDENCE

I hereby notify the District Office and all oversight agencies that, in the coming days, I will be submitting a comprehensive series of motions and evidentiary addenda. These will include, but are not limited to:

Medical documentation (ADA, FMLA, HIPAA-protected)

Payroll and IRS/SSA reporting records

Evidence of confidentiality and data handling violations

Detailed timelines of retaliation, record falsification, and bad faith

Cross-agency correspondence and legal filings

This evidence is crucial to the fair adjudication of this matter and must be reviewed by an impartial and procedurally compliant investigator.

SUPPLEMENTAL FILING NOTICE

This document constitutes a partial submission and does not represent the entirety of the evidence, argument, or supporting material intended for the record in this matter. Due to length and logistical constraints, certain sections and exhibits have been temporarily omitted. The remaining portions of this filing, including all referenced attachments and supplemental arguments, are forthcoming and will be submitted imminently. The undersigned respectfully requests that the record remain open for the inclusion of these additional materials and that no final determination or adverse action be taken until the complete record is available for review.