



OFFICE OF CIVIL RIGHTS AND ADJUDICATION

WASHINGTON, D.C. 20460

October 5, 2026

Return Receipt Requested:

Certified Mail No.: 7015 3010 0001 1267 3719

Michael Patterson
North America Chief Executive Officer
Curium LLC
111 West Port Plaza Drive, Suite 800
St. Louis, MO 63146

RE: Rejection and Referral of EPA Complaint No. 39-26-R7

Dear Chief Executive Officer Patterson:

As you are aware, the U.S. Environmental Protection Agency (EPA), Office of Civil Rights and Adjudication (OCRA), External Civil Rights Division (ECRD) received the above-referenced complaint against Curium LLC on May 4, 2026. Complainant raises allegations of employment discrimination based on sex (female) and race (African American) because she is paid less than similarly situated employees of different races and sexes.

This letter serves to notify you that ECRD is rejecting and referring the complaint.

Pursuant to EPA's nondiscrimination regulation, ECRD must conduct a preliminary jurisdictional review of administrative complaints to determine whether to accept, reject, or refer it to an appropriate federal agency. *See* 40 C.F.R. § 7.120(d)(1). To be accepted for investigation, a complaint must meet the jurisdictional requirements described in EPA's nondiscrimination regulation.

First, the complainant must submit a complaint in writing. *See* 40 C.F.R. § 7.120(b)(1). Second, the entity that the complainant identifies as allegedly engaging in discrimination must be an applicant for, or recipient of, EPA financial assistance. *See* 40 C.F.R. § 7.15.

Third, the complainant must describe an alleged discriminatory act that, if true, may violate EPA's nondiscrimination regulation. *See* 40 C.F.R. §§ 7.120(b)(1) and 7.100. An alleged discriminatory act is one based on race, color, national origin, sex, age, disability, or engaging in or opposing a protected activity. Fourth, a complainant must file the complaint within 180 days of the alleged discriminatory act. *See* 7.120(b)(2).

After careful consideration, ECRD is rejecting this complaint because Curium LLC is not a recipient of financial assistance from the EPA.

However, pursuant to EPA's nondiscrimination regulations at 40 C.F.R. § 7.120(d), and due to the subject matter of the allegations, the claim may fall under the jurisdiction of the U.S. Equal Employment Opportunity Commission (EEOC). Therefore, ECRD is referring the complaint to EEOC for it to make a determination regarding EEOC's jurisdiction. ECRD is closing this complaint as of the date of this letter.

Below is contact information for the EEOC St. Louis District Office should you wish to follow up with EEOC on this referral:

David Davis, Director
U.S. Equal Employment Opportunity Commission
St. Louis District Office
1222 Spruce Street, Room 8-100
St. Louis, MO 63103
David.Davis@eeoc.gov

Finally, EPA's nondiscrimination regulation prohibits applicants, recipients, and other persons from intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they have acted or participated in an action to secure rights protected by the civil rights requirements EPA enforces. *See* 40 C.F.R. § 7.100. Any individual that believes a recipient has engaged in such misconduct can file a complaint with EPA.

If you have any questions, please contact Case Manager Jamillah Harris by email at Harris.Jamillah@epa.gov or by phone at 202-564-9664.

Sincerely,



JuanCarlos M. Hunt, Director
U.S. EPA, Office of Civil Rights and Adjudication

cc: David Cozad, Deputy Regional Administrator/Deputy Civil Rights Official
Leslie Humphrey, Regional Counsel
U.S. EPA, Region 7