



Pursuant to the authority granted to the New Jersey Attorney General to investigate potential violations of the LAD and the New Jersey False Claims Act, N.J.S.A. 2A:32C-1 to 18 (the “False Claims Act”), and in conjunction with the investigation of Feldeisen’s Verified Complaints against Respondents, the Attorney General and the Director have conducted an investigation into certain aspects of Falasca’s compliance with the Equal Employment Opportunity Rules for public contractors set forth at N.J.A.C. 17:27-1 to 12 (the “EEO Rules”). The Attorney General and the Director made investigative findings that for a period of at least four years, encompassing over 150 public contracts, Falasca has not been in compliance with the EEO Rules when accepting and carrying out public contracts. Falasca contests those findings, admits no liability therewith, and maintains that it has made good faith efforts to employ female workers in compliance with the EEO Rules. Because Falasca’s contractual relationship with Local 322 directly affects its employment practices and involves Local 322 in those practices, Local 322 was also required to respond to the investigation. Local 322 was not a subject of the Division’s investigative findings, with respect to either the Verified Complaints or the investigation of Falasca’s compliance with the EEO Rules. Local 322 nonetheless provides its consent to the provisions of this agreement. In addition to resolving Feldeisen’s allegations against Respondents, the Director has agreed with Respondents to resolve all issues in controversy with respect to the investigation of Falasca’s compliance with the EEO Rules, without litigation or any admission of liability, on the terms set forth in this Administrative Consent Order.

IT IS, THEREFORE, ON THIS 4<sup>th</sup> DAY OF Feb 2014, ORDERED  
AND AGREED AS FOLLOWS:

## EMPLOYMENT AND LABOR UNION PRACTICES

1. Respondents will comply with all provisions of the LAD and the EEO Rules in their employment referral relationship and in all decisions and practices related to their respective organizations. Where an agreement between Respondents addresses any employment or labor issue, Respondents will ensure that the terms of such agreement do not contravene their obligations under the LAD and the EEO Rules.

2. Falasca will modify its notice letter to labor unions (the "Notice of Contract Letter"), sent pursuant to N.J.A.C. 17:27-3.8, regarding the makeup of its workforce on public contracts,<sup>1</sup> specifying that Falasca will request from the union, at the time when workers are needed, the referral of female workers in accordance with the targeted goals of the contract for each trade, as those goals are set forth periodically by the New Jersey Department of the Treasury ("Treasury") and available at [www.state.nj.us/treasury/contract\\_compliance](http://www.state.nj.us/treasury/contract_compliance), and requesting assurance that the union will cooperate by referring available female workers when they are requested. The Notice of Contract Letter will notify each union that if assurance cannot be obtained at least five business days prior to commencement of the construction work, Falasca will seek to meet the targeted goals for the contract through the protocol outlined in N.J.A.C. 17:27-3.8(a)(1)(i), and (b), and, consistent with the protocol outlined in the terms of its collective bargaining agreement with Local 322, may seek to meet the targeted goals through contact with affiliated unions and hiring of "out of territory," female union members. The Notice of Contract Letter will be sent to all unions from whom Falasca may receive referrals before the commencement of work on every public contract awarded to Falasca

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<sup>1</sup> "Public contract" is defined, pursuant to N.J.S.A. 10:5-31(a), as "any contract to be performed for or on behalf of the State or any county or municipality or other political subdivision of the State, or any agency or authority created by any of the foregoing[...]," and is understood by the parties to this Consent Order to include all *subcontracts* to perform work for or on behalf of the State or any county or municipality or other political subdivision of the State.

from the date this Consent Order is fully executed. A sample copy of the modified Notice of Contract Letter will be provided to the Division within 30 days from the date this Consent Order is fully executed.

3. For every public contract awarded from the date this Consent Order is fully executed, and before commencement of work on the project begins, Falasca will make a specific request to Local 322 for the referral of female plumbers in accordance with the number of female plumbers needed to fulfill the targeted goal. This request will be in addition to the Notice of Contract Letter described above or any other letter regarding compliance with EEO Rules compliance sent to Local 322 prior to commencement of the project. There will be no exceptions to the requirement that Falasca make this request, including instances where male workers are available to fill all plumber positions needed. This provision is not intended to limit Falasca should there be a need, after work on the public contract begins, to request additional female workers.

4. For every public contract awarded from the date this Consent Order is fully executed, Falasca will keep specific records of its efforts to reach the targeted hiring goal for women in each trade necessary to complete the contract, including records of all individuals requested or referred from a union, interviewed, or hired. The records will be maintained and kept accessible for a period of at least three years from the full completion of work on each public contract.

5. Respondents will not take retaliatory action against anyone who participated, in any manner, in the initiation or investigation of this matter.

#### ANTI-DISCRIMINATION POLICY AND TRAINING

6. In addition to compliance with the requirements of the LAD and EEO Rules, Falasca will develop its own anti-discrimination and EEO Rules compliance policy (hereinafter the "Policy"). Within 30 days of the date this Consent Order is fully executed, Falasca will provide a

copy of the Policy to the Division, via both electronic mail and facsimile to Lorraine LeSter, Manager of Special Investigations (e-mail: [lorraine.lester@njcivilrights.gov](mailto:lorraine.lester@njcivilrights.gov) / fax: (973) 648-7852) and Deputy Attorney General Megan Harris (email: [megan.harris@dol.lps.state.nj.us](mailto:megan.harris@dol.lps.state.nj.us) / fax: (973) 648-4887). Within 60 days from the date this Consent Order is fully executed, Falasca will distribute the Policy to all unions with whom it has a collective bargaining or other type of labor agreement. Falasca will also post the Policy at each of its offices, at each of its job sites, at [falascamechanical.com](http://falascamechanical.com), and at any other web site Falasca may use for advertisement and solicitation of business and/or employment opportunities.

7. Within 90 days of the date this Consent Order is fully executed, Falasca will provide training on its anti-discrimination and EEO compliance Policy to all project managers, foremen, hiring personnel, and Local 322's Business Manager. The training set forth above will be conducted by a qualified person or persons with a background in and knowledge of the LAD and civil rights law. The training will, at minimum, verbally inform those in attendance of the provisions of the Policy, explain how those provisions will affect Falasca's staffing of construction projects, and provide an opportunity for attendees to ask questions regarding the Policy or any issue related to discrimination or harassment. Attendance at the training shall be mandatory for all persons specified above, including Local 322's Business Manager, and Falasca will have each attendee sign in on a form that will be provided to the Division within seven business days of the training session. Local 322 consents to this provision and will be responsible for ensuring that its Business Manager is in attendance at the training.

8. At least 10 days prior to each training session necessary to fulfill the commitment set forth in paragraph 7, Falasca shall inform the Division of the date, time, and location of the training session. Such notice shall be in writing via both electronic mail and facsimile to Lorraine LeSter,

Manager of Special Investigations (e-mail: [lorraine.lester@njcivilrights.gov](mailto:lorraine.lester@njcivilrights.gov) / fax: (973) 648-7852) and Deputy Attorney General Megan Harris (email: [megan.harris@dol.lps.state.nj.us](mailto:megan.harris@dol.lps.state.nj.us) / fax: (973) 648-4887). Falasca will permit one or more representatives of the Division to attend each training session for its entirety.

#### OUTREACH AND RECRUITMENT

9. Local 322 and Falasca will make a joint cooperative effort to increase female recruitment into Local 322 and increase training and employment opportunities for female plumbers during the next three apprenticeship recruitment cycles following execution of this Consent Order. Such effort shall include, but not necessarily be limited to, the obligations set forth below. The “next three apprenticeship cycles” (or “apprenticeship classes”) is defined as the cycle for which recruiting will begin in January or February 2014 and the following two cycles, whenever those two cycles begin.

10. Local 322 will, within 30 days of the date this Consent Order is fully executed, formally recommend and fully support a proposal to its Joint Apprenticeship Training Committee (the “JATC”), to make good faith efforts to increase training and apprenticeship opportunities for female participants during the next three apprenticeship recruitment cycles. Increased training and apprenticeship opportunities will mean, at minimum, inclusion of any eligible and selected female applicants in JATC’s five-year apprenticeship program, and upon fulfillment of all requirements of Respondent’s apprenticeship program, receipt of a certificate of completion. In addition, the proposal to be recommended to JATC with Respondents’ full support will include a commitment, through each of the efforts outlined in Paragraphs 11 and 12, to strengthen its outreach to and recruitment of women, for a minimum of the next three plumbing and pipefitting apprenticeship classes, including the class for which JATC will begin accepting applications in or about March

2014. The proposal will also include a commitment, as outlined in Paragraphs 14 and 15, to provide to the Division information regarding JATC's outreach and recruitment efforts for the next three apprenticeship classes, which will include information regarding the pool of persons who request an application, the pool of eligible applicants, and the persons selected for the apprenticeship class.

11. Local 322 will recommend to JATC, with their stated support, that JATC's specific efforts to recruit female applicants to each of the next three plumbers and pipefitters apprenticeship classes, include, in addition to any notice JATC already plans to provide or has provided in the past, providing notice at least 30 days in advance of the earliest date for application to the following schools, agencies, and organizations:

- i. Atlantic County Institute of Technology (County Apprenticeship Coordinator);
- ii. Burlington County Institute of Technology (County Apprenticeship Coordinator);
- iii. Camden County Technical Schools (County Apprenticeship Coordinator);
- iv. Cape May County Technical School District (County Apprenticeship Coordinator);
- v. Cumberland County Technical Education Center (County Apprenticeship Coordinator);
- vi. Gloucester County Institute of Technology (County Apprenticeship Coordinator);
- vii. Salem County Vocational Technical Schools (County Apprenticeship Coordinator);
- viii. New Jersey Department of Labor and Workforce Development , to include: (a) direct notice to the State Apprenticeship Coordinator; (b) a post at [jobs4jersey.com](http://jobs4jersey.com); (c) direct notice to each local Workforce Investment Board covering Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, and Salem Counties; and (d) direct notice to the Atlantic, Camden, and Cumberland/Salem New Jersey YouthCorps Programs);

- ix. State of New Jersey Employment and Training Commission;
- x. New Jersey Department of Military and Veterans Affairs, to include direct notice to the County Veterans Service Offices for Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, and Salem;
- xi. New Jersey State Building and Construction Trades Council;
- xii. New Jersey Higher Education Student Assistance Authority/Governor's Industry Vocation Scholarship for Women and Minorities Program;
- xiii. New Jersey Department of Children and Families, Division on Women;
- xiv. YouthBuild Camden (operated through Camden Housing Authority);
- xv. New Jersey Institute of Social Justice; and
- xvi. Habitat for Humanity of Salem County.

Notice under this paragraph will mean, at minimum, providing written information in the form of the Sample Notice attached to this Consent Order as "Exhibit A."

12. In addition to the efforts set forth in Paragraph 11, Local 322 will recommend to JATC, with their stated support, that JATC's specific efforts to recruit female applicants to each of the next three plumbers and pipefitters apprenticeship classes, include, in addition to any notice JATC already plans to place in a publication or has placed in the past, notice at least 30 days in advance of the earliest date for application in four (4) or more of the following New Jersey publications:

- i. Burlington County Times;
- ii. Courier-Post;
- iii. The Daily Journal;
- iv. Gloucester County Times;

- v. The News of Cumberland County; and
- vi. The Press of Atlantic City.

Notice under this paragraph will mean, at minimum, providing the dates during which applications will be available, the Union's uniform resource locator/web site address, and the Union's office telephone number.

13. At the time of the next three JATC plumbing and pipefitting apprenticeship recruitment periods, Falasca will provide personal, written notice of the availability of plumbing and pipefitting apprenticeship applications to any female employees of Falasca who are working as unskilled laborers, or in any trade other than plumbing or pipefitting. Falasca will provide such notice at least 30 days in advance of the earliest date for application and include the same information as set forth in Exhibit A to the Consent Order.

14. In addition to the efforts set forth in Paragraphs 11 and 12, Local 322 will also recommend, with their stated support, that JATC require each person who appears in person to request an application to print his or her name on a sign-in list. For the next three apprenticeship classes, JATC will maintain such list throughout the period for which it has publicized that applications will be distributed, and indicate next to each person's name whether or not the person received an application.

15. Local 322 will also recommend to JATC, with their stated support, that for each of the next three apprenticeship class cycles, JATC document and keep records of all efforts to recruit eligible women pursuant to Paragraphs 11 and 12 for at least three years from the date each apprenticeship class begins. Local 322 will also recommend to JATC that no later than December 31 of the years in which the next three apprenticeship classes begin, JATC submit to the Division a

report of all activities and efforts related to Paragraphs 11 and 12 of this Consent Order, and the results of those activities and efforts in the form of the following documents and information:

- i. A copy of the sign-in list described in Paragraph 14;
- ii. A list of all applicants, whether or not selected;
- iii. A list of all applicants who took the WorkKeys test, indicating whether each applicant received the requisite numerical score;
- iv. A list of applicants who were interviewed;
- v. A list of applicants to whom an offer was made to join the apprenticeship class; and
- vi. A list of the final accepted members of the class, indicating the gender of each person.

16. Within 60 days of the date this Consent Order is fully executed, Local 322 will report to the Division on the decision of JATC as to Respondents' formal recommendation to increase training and apprenticeship opportunities as set forth in Paragraphs 10 through 12. If the recommendation is not accepted, Local 322 will report as to which entities represented on the JATC voted in favor and which entities voted against the proposal. The report will be provided via both electronic mail and facsimile to Lorraine LeSter, Manager of Special Investigations (e-mail: [lorraine.lester@njcivilrights.gov](mailto:lorraine.lester@njcivilrights.gov) / fax: (973) 648-7852) and Deputy Attorney General Megan Harris (email: [megan.harris@dol.lps.state.nj.us](mailto:megan.harris@dol.lps.state.nj.us) / fax: (973) 648-4887).

17. In conjunction with JATC, or on its own initiative, Local 322 will undertake outreach to first and/or second-year students in at least three area vocational-technical high schools during each of the next five academic years, including academic year 2013 - 2014. Outreach undertaken pursuant to this provision will be for the purpose of providing information about the plumbing profession and industry and encouraging first and second year female students, if female students are

present, to pursue careers in plumbing. The activities of the program shall include, but will not necessarily be limited to, coordinating with at least three (3) area vocational-technical high schools to schedule a presentation from a female journeyman to the first and/or second year students during each of the next five academic years, including academic year 2013 - 2014. No later than December 31 of the years 2014 through 2019, Local 322 will provide a report to the Division on the fulfillment of this provision.

18. In conjunction with JATC, or on its own initiative, Local 322 will undertake outreach involving the third and fourth year students in at least three area vocational-technical high schools during each of the next five academic years, including academic year 2013 - 2014. Outreach undertaken pursuant to this provision will be for the purpose of providing information about the plumbing profession and industry and encouraging third and fourth year female students, if female students are present, to pursue careers in plumbing. The activities of the program shall include, but will not necessarily be limited to, hosting an on-site career day at the JATC training center at least once during each of the next five academic years, including academic year 2013 – 2014, for all third and fourth year students expressing interest in attending. No later than December 31 of the years 2014 through 2019, Local 322 will provide a report to the Division on the fulfillment of this provision.

19. The Director has not reviewed, investigated, or otherwise evaluated any of JATC's eligibility requirements, its method of evaluating applicants, or its method of selecting apprentices, and the Director makes no representations whatsoever as to JATC's apprenticeship application or selection process. Nothing in this Consent Order is to be construed as impacting JATC's eligibility requirements, evaluation of apprenticeship applications, or selection of eligible applicants for the apprenticeship class, nor should anything in this Consent Order be construed as a release related to

the aforementioned items. Further, other than that which is explicitly stated in Paragraph 25, nothing in this Consent Order is intended to create a basis for enforcement of its terms against JATC.

#### MONETARY RELIEF

20. Falasca will pay, in settlement of all allegations related to Feldeisen's September 9, 2010 Verified Complaint to the Division, and within 30 days of the date this Consent Order and the separate agreement referenced in Paragraph 34 of this Consent Order are both fully executed (meaning all parties to each agreement have signed), the sum of one-hundred fifty-thousand dollars (\$150,000.00), via check made payable to "Bette Feldeisen," and delivered to Deputy Attorney General Megan Harris at 124 Halsey Street, 5th Floor, P.O. Box 45029, Newark, New Jersey 07101.

21. Falasca will pay, in settlement of all potential allegations related to the Attorney General's investigation of its compliance with EEO Rules on public contracts, and within 30 days of the date this Consent Order is fully executed, the sum of two-hundred fifty-thousand dollars (\$250,000.00), via check made payable to "Treasurer, State of New Jersey," and delivered to Deputy Attorney General Megan Harris at 124 Halsey Street, 5th Floor, P.O. Box 45029, Newark, New Jersey 07101.

22. Should Falasca fail to make payment in settlement of this matter as set forth above, this Consent Order is void in its entirety. Should this Consent Order become void, the Attorney General and the Division reserve the right to reject renegotiation of its terms and proceed with litigation of this matter.

#### GENERAL PROVISIONS

23. In consideration of the monetary and equitable relief set forth above, and as to all factual and legal allegations contained in the Verified Complaints bearing Division Docket No. EF14SB-61686 and Division Docket No. ED36SB-61688, this Consent Order releases Respondents

and their past and present principals, agents, officers, shareholders, and employees, including predecessors and successors in interest, and insurers, from all claims, demands, damages, causes of action, or suits, as well as claims for attorneys' fees, interest, expenses and costs, which have been or could have been brought in any forum by the parties to this Consent Order in relation to those factual and legal allegations. Notwithstanding this Release, Respondents and all related persons and entities described above expressly deny any liability.

24. In consideration of the monetary and equitable relief set forth above, and as to all hiring practices related to public contracts and occurring on or before September 30, 2013, this Consent Order releases Falasca from all claims, demands, damages, causes of action, or suits, as well as claims for attorneys' fees, interest, expenses and costs, which have been or could have been brought and are related to compliance with the LAD and EEO Rules in any forum by the parties to this Consent Order.

25. In consideration of the equitable relief set forth in Paragraphs 9 through 12, and 14 through 18, this Consent Order releases Local 322 and JATC from all claims, demands, damages, causes of action, or suits, as well as claims for attorneys' fees, interest, expenses and costs, which could have been brought in any forum and are related to past apprenticeship outreach and recruitment activities. If, however, the JATC rejects the proposal set forth in Paragraphs 10, 11, 12, 14, and 15, or any material portion of the proposal set forth in those Paragraphs, including the provisions to undertake certain recordkeeping and reporting to the Division, the release set forth in this Paragraph is null and void as to JATC.

26. Falasca shall not, on the basis of this Consent Order or any of the allegations underlying this Consent Order, be debarred from bidding or contracting with the State of New Jersey or any county, municipality, or other political subdivision, agency, or authority created by the State

of New Jersey. Nothing in this provision shall be construed as a waiver of any claims or right to action the Attorney General or Director may have if Falasca violates this Consent Order.

27. Nothing in this Consent Order shall in any manner be construed to limit or affect the rights of any persons, other than the parties to this Consent Order, who may have a claim against Respondents or any individual or entity involved in this matter, including any state or federal agency other than the New Jersey Office of the Attorney General, the New Jersey Division on Civil Rights, and the New Jersey Department of Labor and Workforce Development.

28. Other than an act or practice explicitly required by and set forth in the provisions of this Consent Order, Respondents shall not represent or imply that by virtue of this Consent Order, any act or practice hereinafter used or engaged in is required or approved, in whole or in part, by the New Jersey Attorney General, the New Jersey Division on Civil Rights, or any other State of New Jersey agency or subdivision.

29. Unless otherwise specified, all reports or notices to the Division required by this Consent Order will be sent via mail, parcel delivery service, or hand delivery to: Director, New Jersey Division on Civil Rights, 31 Clinton Street, 3rd Floor, Newark, New Jersey 07102.

30. The parties to this Consent Order acknowledge that for the purpose of enforcement of this Consent Order, New Jersey law shall govern the terms and provisions herein.

31. As used in this Consent Order, the plural shall include the singular and the singular shall include the plural. In addition, "or" and "and" shall be interpreted conjunctively.

32. The parties to this Consent Order represent that a person authorized to sign a document legally binding each party to its terms has signed this Consent Order with full knowledge, understanding, and acceptance of its terms. Feldeisen acknowledges that she has had the opportunity to review all terms of this agreement and seek the advice of independent counsel as to its effect and

her related obligations.

33. This Consent Order constitutes the entire agreement between the Director, the Attorney General, Falasca, Local 322, and Feldeisen with respect to its subject matter and as of its effective date. Any and all representations and understandings not embodied in this Consent Order are of no force or effect. Any addition, deletion, or change to this Consent Order must be in writing and signed by all parties to be bound by such addition, deletion, or change.

34. Falasca and Feldeisen have a separate agreement related to this matter and addressing confidentiality and mutual non-disparagement. Neither the Director nor the Attorney General is a party to that separate agreement, nor is any agency or division of the State of New Jersey bound by the agreement.

35. The parties to this Consent Order have negotiated and fully reviewed its terms. Uncertainty or ambiguity shall not, therefore, be construed against the drafter.

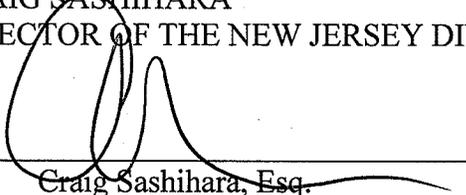
36. This Consent Order is executed in settlement of the allegations and potential allegations against Respondents as described above, and shall not be construed to otherwise limit the authority of the New Jersey Attorney General or the Director of the New Jersey Division on Civil Rights to protect the interests of the State of New Jersey or the people of the State of New Jersey, including LAD and EEO Rules enforcement against Respondents for matters not resolved through this Consent Order.

37. If any portion of this Consent Order is held invalid or unenforceable by operation of law, the remaining terms of this Consent Order shall not be affected.

38. This Consent Order shall be binding upon the parties to this agreement and their successors. In no event shall assignment of any right, power, or authority avoid compliance with the terms of this Consent Order.

39. In the event that Respondents default on any provision of this Consent Order, Respondents consent to the entry of this Consent Order in New Jersey Superior Court for the purpose of enforcement. Before application is made to enter this Consent Order in New Jersey Superior Court, Respondents will be provided notice of the default and fifteen (15) days to cure the default.

CRAIG SASHIHARA  
DIRECTOR OF THE NEW JERSEY DIVISION ON CIVIL RIGHTS

By:   
Craig Sashihara, Esq.

Dated: 2-4-14

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By:   
Megan J. Harris  
Deputy Attorney General

Dated: 2/4/2014

RESPONDENT FALASCA MECHANICAL, INC. HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_

Dated: \_\_\_\_\_

RESPONDENT PLUMBERS AND PIPEFITTERS, LOCAL UNION NO. 322 HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_

Dated: \_\_\_\_\_

COMPLAINANT BETTE FELDEISEN CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_  
Bette Feldeisen

Dated: \_\_\_\_\_

39. In the event that Respondents default on any provision of this Consent Order, Respondents consent to the entry of this Consent Order in New Jersey Superior Court for the purpose of enforcement. Before application is made to enter this Consent Order in New Jersey Superior Court, Respondents will be provided notice of the default and fifteen (15) days to cure the default.

CRAIG SASHIHARA  
DIRECTOR OF THE NEW JERSEY DIVISION ON CIVIL RIGHTS

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Craig Sashihara, Esq.

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Megan J. Harris  
Deputy Attorney General

RESPONDENT FALASCA MECHANICAL, INC. HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By:  Dated: 1/30/14

RESPONDENT PLUMBERS AND PIPEFITTERS, LOCAL UNION NO. 322 HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_ Dated: \_\_\_\_\_

COMPLAINANT BETTE FELDEISEN CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Bette Feldeisen

39. In the event that Respondents default on any provision of this Consent Order, Respondents consent to the entry of this Consent Order in New Jersey Superior Court for the purpose of enforcement. Before application is made to enter this Consent Order in New Jersey Superior Court, Respondents will be provided notice of the default and fifteen (15) days to cure the default.

CRAIG SASHIHARA  
DIRECTOR OF THE NEW JERSEY DIVISION ON CIVIL RIGHTS

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Craig Sashihara, Esq.

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Megan J. Harris  
Deputy Attorney General

RESPONDENT FALASCA MECHANICAL, INC. HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_ Dated: \_\_\_\_\_

RESPONDENT PLUMBERS AND PIPEFITTERS, LOCAL UNION NO. 322 HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By:  Dated: 1/29/11

COMPLAINANT BETTE FELDEISEN CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Bette Feldeisen

39. In the event that Respondents default on any provision of this Consent Order, Respondents consent to the entry of this Consent Order in New Jersey Superior Court for the purpose of enforcement. Before application is made to enter this Consent Order in New Jersey Superior Court, Respondents will be provided notice of the default and fifteen (15) days to cure the default.

CRAIG SASHIHARA  
DIRECTOR OF THE NEW JERSEY DIVISION ON CIVIL RIGHTS

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Craig Sashihara, Esq.

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: \_\_\_\_\_ Dated: \_\_\_\_\_  
Megan J. Harris  
Deputy Attorney General

RESPONDENT FALASCA MECHANICAL, INC. HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_ Dated: \_\_\_\_\_

RESPONDENT PLUMBERS AND PIPEFITTERS, LOCAL UNION NO. 322 HEREBY CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: \_\_\_\_\_ Dated: \_\_\_\_\_

COMPLAINANT BETTE FELDEISEN CONSENTS TO THE FORM AND ENTRY OF THIS CONSENT ORDER:

By: Bette G. Feldeisen Dated: 1-31-14  
Bette Feldeisen

# **EXHIBIT A**



# PLUMBERS AND PIPEFITTERS LOCAL UNION 322

## Southern New Jersey AFL-CIO

534 S. Route 73 • PO Box 73 • Winslow, NJ 08095  
609-567-3322 • Fax 609-567-9695  
e-mail: [office@local322.org](mailto:office@local322.org) • [www.ua322.org](http://www.ua322.org)

### 2014 Apprenticeship Applications

Plumbers & Pipefitters Local Union 322 will have available **200** applications for apprenticeship at its Training Facility in Winslow, New Jersey. Applications for a 5 year program will be open on the following dates;

Dates	Times
March 3, 2014	8:00 AM to 3:00 PM
March 4 – 7, 2014 & March 10 – 14, 2014	8:00 AM to 11:00 AM

Applicants must be at least 17 years of age at the time of application and hold a valid driver's license and will be 18 years of age prior to being indentured by the JATC.

A Math and Reading WorkKeys tests will be conducted on April 10, 2014. Sample WorkKeys tests for Reading and Mathematics can be found at [www.act.org/workkeys/practice](http://www.act.org/workkeys/practice)

**Copies of all the following documents must be presented to receive an application.** Applications will not be handed out without all proper **copies** of documents. **NOTE:** All applicants must also bring a **\$45.00 money order** for processing fee which includes the fee for the State Exam. **No checks will be accepted.**

1. **Copy** of valid New Jersey Driver's License
2. **Copy** of valid proof of birth date; examples – valid driver's license, birth certificate or other State ID
3. **Copy** of High School Diploma or High School Equivalency (GED) Certificate and official report of test results.
4. **Copy of Official** High School and Post High School Education and Training Transcript (can be faxed to 609-567-9695 or emailed to [office@local322.org](mailto:office@local322.org))
5. **Copy** of Military Transfer or Discharge Form DD-214, if applicable.
6. **Money Order** (no checks accepted) in the amount of \$45.00 made payable to Local 322 Education Fund

Prior applicants must resubmit the above documents. Incomplete applications will not be considered.

Recruitment, selection, employment and training will be without discrimination because of race, color, religion, national origin or sex. Female and minority applicants are encouraged to apply.

Applicants must reside in and have been a bona fide resident of the geographical jurisdiction of Local Union 322 for one year prior to making application. This includes all of Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, Ocean and Salem Counties.

This announcement does not guarantee employment.

**NOTE:** The applications will be distributed on a first-come-first-served basis. Applications will be filled out by the applicant at the Local Union office only. Please be sure to have **copies of all** documents mentioned above with you. Prior applicants must resubmit the above documents. Incomplete applications will not be considered.

To view a sample application go to [www.ua322.org/applications.aspx](http://www.ua322.org/applications.aspx)

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Business Manager JAMES B. KEHOE	Asst. Business Manager RAYMOND S. MACDOWELL	Financial Sec-Treas THOMAS P. PAGE	Business Representatives DANIEL B. REED KURT R. KRUEGER, JR.	Organizer JOSEPH HARKINS
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