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By: Farngh-Yi D. Foo
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██████████ and the
DIRECTOR OF THE NEW JERSEY
DIVISION ON CIVIL RIGHTS,

Complainants,

v.

GOLDEN GRANGE KENNELS, LLC and
JOSEPH MOSNER, Individually,

Respondents.

STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS

Administrative Action

DCR Docket No. EC07WB-63382

CONSENT ORDER AND DECREE

WHEREAS, ██████████ (“Complainant”) filed a verified complaint with the New Jersey Division on Civil Rights (“Division”) with Docket No. EC07WB-63382 alleging that she was subjected to sexual harassment and constructively discharged by her former employer Respondent Golden Grange Kennels, LLC and Joseph Mosner (“Respondents”) in violation of the New Jersey Law Against Discrimination; and

WHEREAS, Respondent Golden Grange Kennels, LLC is an employer in the State of New Jersey; and

WHEREAS, Respondent Joseph Mosner is the owner and operator of Respondent Golden Grange Kennels, LLC; and

WHEREAS, the matter has been the subject of an investigation and the Director of the Division on Civil Rights (the "Director") has found probable cause to credit the allegations of unlawful discrimination; and

WHEREAS, in the public interest, the Director was added as a Complainant in the matter; and

WHEREAS, Respondents deny the allegations of the verified complaint; and

WHEREAS, the parties desire to conciliate and settle the matter without the necessity of a public hearing.

NOW THEREFORE, it is on this day 14th of AUG, 2014,

ORDERED and AGREED as follows:

1. Respondents agree that all employment decisions shall comply with the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq., and shall be conducted in a nondiscriminatory manner, and that Respondents shall not implement any policy or procedure having the effect of discriminating against any individual on the basis of race, creed, color, national origin, ancestry, age, marital status, civil union status, domestic partnership status, affectional or sexual orientation, genetic information, pregnancy, sex, gender identity or expression, disability, liability for service in the Armed Forces of the United States or nationality.

2. Respondents agree not to engage in any act prohibited by the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 to -42, including any retaliatory conduct against [REDACTED] or against any witness or participant in these proceedings, or allow any of its employees to engage in any such conduct.

3. Respondents agree to comply with all posting and notice requirements for employers and owners of places of public accommodation pursuant to N.J.A.C. 13:8-1.2 and 13:8-1.4.

MONETARY RELIEF

4. Without admitting the allegations set forth in the February 27, 2014 Finding of Probable Cause, the Respondents shall pay the Complainant the total sum of twenty thousand dollars (\$20,000), in resolution of the allegations of sexual harassment as set forth in her verified complaint. Such payment shall be made as follows:

- a. A payment of ten thousand dollars (\$10,000) shall be made within fifteen (15) days from the execution of this agreement.
- b. A payment of ten thousand dollars (\$10,000) shall be made within thirty (30) days from the execution of this agreement.
- c. All payments shall be made by check or money order, be made payable to [REDACTED] and shall be delivered to Carlos Bellido, Chief of Staff, New Jersey Division on Civil Rights, P.O. Box 46001, 31 Clinton Street, 3rd Floor, Newark, New Jersey 07102 for delivery to [REDACTED]

5. Respondent agrees to pay the Division the total sum of two thousand dollars (\$2,000) for administrative costs incurred in processing this matter. This payment shall be made within forty-five (45) days from the execution of this agreement. This amount shall be made by check or money order, made payable to the State of New Jersey, Department of Law & Public Safety, Division of Law and shall be delivered to Carlos Bellido, Chief of Staff, New Jersey Division on Civil Rights, P.O. Box 46001, 31 Clinton Street, 3rd Floor, Newark, New Jersey 07102.

EQUITABLE RELIEF

6. By no later than ~~August 1, 2014~~^{Sept 10, 2014}, Respondents agree to develop a written anti-discrimination and anti-harassment policy, which includes an effective complaint procedure for its employees to report discrimination and harassment (referred herein as “the Policy”).

7. The Policy (as referenced in paragraph 6) shall contain, at minimum, the following:

- a. A clear explanation of the prohibited conduct, including a delineation of the classes and characteristics protected by the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq., and the types of derogatory statements and conduct that may constitute unlawful harassment or discrimination;
 - b. A clearly defined complaint process that designates, by names or job titles, those persons to whom discrimination or harassment complaints should be directed, and designates alternate individuals for circumstances in which the designated individuals are unavailable or may be conflicted;
 - c. A process that ensures that Respondent Golden Grange Kennels, LLC will provide a prompt, thorough, and impartial investigation;
 - d. A process that ensures that Respondent Golden Grange Kennels, LLC will take prompt, effective, and appropriate remedial action when it determines discrimination or harassment has or may have occurred;
 - e. Assurance that Respondent Golden Grange Kennels, LLC will protect the confidentiality of discrimination and harassment complaints to the extent possible;
- and

f. A statement that informs employees that they may file a discrimination or harassment complaint with the Division and/or the Federal Equal Employment Opportunity Commission.

8. Respondent Golden Grange Kennels, LLC shall identify persons other than Respondent Joseph Mosner to receive or investigate complaints of discrimination or harassment or participate in the duties as set forth in paragraph 7(b).

9. The Policy shall be distributed to employees of Respondent Golden Grange Kennels, LLC no later than ~~August 30, 2014~~ ^{November 10, 2014}. Respondent Golden Grange Kennels, LLC shall forward a copy of the Policy to Ana Limo-Magras at the Division on Civil Rights, P.O. Box 46001, Newark, New Jersey 07102 at least ten (10) days prior to distribution. Respondent shall maintain a copy of the Policy in a readily accessible location in its office.

10. Respondents shall arrange for training of all members of Respondent Golden Grange Kennels, LLC's management staff and employees. Such training shall address anti-discrimination laws and policies in the workplace and be conducted by a qualified person or persons with a background in and knowledge of the Law Against Discrimination and civil rights laws. Such training shall also include sexual harassment in the workplace. All such training shall be completed within three (3) months of the effective date of this Agreement. At least ten days prior to each training session necessary to fulfill the requirements set forth in this paragraph, Respondent shall inform the Division of the date, time and location of the session. Respondent will permit one or more representatives of the Division to attend any or all sessions.

11. Training may be scheduled with the Division on Civil Rights by sending a written request to the Division on Civil Rights, Bureau of Prevention, Outreach, and Public Education, P.O. Box 089, Trenton, New Jersey 08625. If training is conducted by a private firm,

Respondents shall submit a copy of any training materials to Ana Limo-Magras, Division on Civil Rights, 31 Clinton Street, 3rd Floor, P.O. Box 46001, Newark, New Jersey 07102 for review prior to training

12. This Consent Order and Decree shall have the same force and effect as a cease and desist order issued by the Director pursuant to N.J.S.A. 10:5-19 and shall operate as a complete and final disposition of the aforesaid verified complaint, subject only to the fulfillment of all the foregoing provisions.

13. In the event that Respondents default with respect to any provision herein, which would include failing to timely comply with the payment provisions set forth in paragraphs 4 and 5, Respondents hereby consent to the entry of this Consent Order and Decree in the Chancery Division of the Superior Court of New Jersey, thereby making this Consent Order and Decree an order of the Court for purposes of enforcement therein.



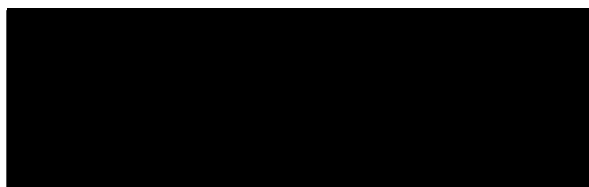
CRAIG SASHIHARA, DIRECTOR
OF THE NEW JERSEY DIVISION
ON CIVIL RIGHTS

8-14-14

DATE


**THE PARTIES CONSENT TO THE FORM, CONTENT AND
ENTRY OF THIS CONSENT ORDER:**

FOR COMPLAINANTS:



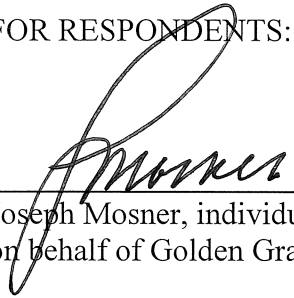
8/9/14
DATE

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Attorney for New Jersey Division on
Civil Rights

By: 
Fang-Yi D. Foo, DAG

DATED: 8/13/14

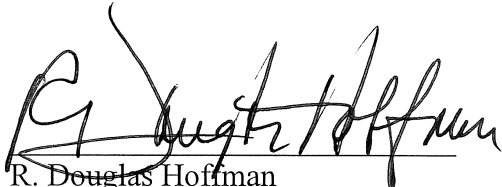
FOR RESPONDENTS:



Joseph Mosner, individually and
on behalf of Golden Grange Kennels, LLC



DATE



R. Douglas Hoffman
Attorney for Respondents
Golden Grange Kennels, LLC and
Joseph Mosner



DATE