



3. Charge of Discrimination:

The above named respondent(s) is hereby charged with unlawful discrimination in violation of the named statutes with respect to the following charges:

3.1 Differential Treatment because of Reprisal/complained of sex based differential treatment in violation of Title VII of the Civil Rights Act of 1964(Title VII)

3.2 Differential Treatment because of Sex/female in violation of Title VII of the Civil Rights Act of 1964(Title VII)

3.3 Differential Treatment because of Reprisal/complained of sex based differential treatment in violation of NJ Law Against Discrimination (NJSA 10:5-12d)

3.4 Differential Treatment because of Sex/female in violation of NJ Law Against Discrimination (NJSA 10:5-12a)

4. THE CHARGE IS BASED ON THE FOLLOWING:

4.1 Complainant belongs to a protected class, in that she is female.

4.2 Respondent employed Complainant as an Explorer in May 2003, promoted her to Junior Firefighter on July 26, 2006, promoted her to Probationary Firefighter on July 26, 2008, and promoted her to Firefighter on December 8, 2008.

4.3 Complainant alleges she engaged in an activity protected by the New Jersey Law Against Discrimination, and did so reasonably and in good faith. Specifically, on March 17, 2009 she complained to Respondent's Deputy Chief, Randall Freiling, and in July 2009 to Borough Administrator, Janai Johnson, that Firefighter John Bush Jr., repeatedly made offensive remarks about her sex, such as, "women have no place in the fire service, they're useless," and "that stupid cunt didn't know what she was doing, she should not have been on the job.

4.4 Thereafter, Complainant was subjected to adverse employment actions. Specifically, Respondent's Captain Demetri bumped her off trucks in favor of less qualified junior firefighters, and removed her gear from her locker.

4.5 There is a casual connection between Complainant's protected activity, and the employer's adverse action.

5. RESPONDENT'S REASON FOR ADVERSE ACTION:

5.1 Respondent's Borough Administrator, Janai Johnson, advised Complainant via letter dated August 17, 2009, that a thorough investigation was conducted and corrective action was taken.

6. DISCRIMINATION STATEMENT:

6.1 Complainant alleges she was discriminated against based on her sex, and as a reprisal.

6.2 Specifically, Complainant denies that a thorough investigation was conducted, or that any corrective action was taken, and alleges she was subjected to retaliation for complaining of discrimination.

