

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
DOCKET NUMBER:

J.H., PARENT/GUARDIAN, on behalf of

G.H. a Minor, and [REDACTED]. Individually,
COMPLAINANTS,

-vs-

PLAYA BOWLS,
RESPONDENT.

)
)
) Verified Complaint
) Received and Recorded
) Date: 11/15/2018
) Department of Law and Public Safety
) Division on Civil Rights
) By REW
)
)
)

Complainants J.H. and G.H., residing at [REDACTED]

[REDACTED] allege that Respondent Playa Bowls, located at 1982-610 North Bay Avenue, Beach Haven, Ocean County, New Jersey 08008, sexually harassed G.H., in violation of NJ Law Against Discrimination (LAD) N.J.S.A 10:5-12(a). Complainant alleges as follows:

1. Complainant, J.H., brings this action on behalf of herself, and on behalf of G.H., as her parent. G.H. is a minor and is 16 years old.
2. Respondent hired Complainant as a server in August, 2018.
3. Complainant was subjected to unwelcomed sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature. Specifically, Respondent's supervisor, Jay, asked another co-worker if Complainant would have sex with him.
4. Respondent's supervisor, Jay, inappropriately touched Complainant's back and arms on multiple occasions.
5. Respondent's supervisor, Jay, consistently makes inappropriate sexual comments regarding female employees' body parts.

6. Complainant saw Respondent's supervisor, Jay, push another female co-worker's head towards his genitals to simulate oral sex.
7. Complainant was subjected to conduct that was severe or pervasive enough to make the working environment hostile or abusive occurred because of her sex; and Respondent knew or should have known about the hostile environment and failed to take prompt, effective remedial action.
8. Said acts of discrimination occurred in the County of Ocean in the State of New Jersey.
9. Complainant has not instituted action in any court, either criminal or civil, regarding this matter.

WHEREFORE, Complainant requests whatever relief is provided by law including, but not limited to, return of work responsibilities, compensatory damages for economic loss, humiliation, mental pain and suffering.


COMPLAINANT

