

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
DOCKET NUMBER: ED34IB-667058

Brian Peeke

Complainant

-vs-

NEGOTIATED SETTLEMENT AGREEMENT

Voorhees Diner Group

Respondent

WHEREAS, the named Complainant has filed a Verified Complaint with the Division on Civil Rights alleging that the named Respondent committed unlawful discrimination; and

WHEREAS, the named Respondent is an employer doing business in the State of New Jersey, having a facility located at 320 Route 73 South, Voorhees, New Jersey, and as such is subject to the provisions of N.J.S.A. 10:5-1 et seq.; and

WHEREAS, the named Respondent does not admit that an act of unlawful discrimination occurred; and

WHEREAS, the Complainant and named Respondent desire to resolve the matter without the necessity of further litigation; and

NOW THEREFORE, it is on this 26th day of September, 2018, agreed between Complainants and Respondent that:

1. The named Respondent shall continue to comply with the provisions of N.J.S.A. 10:5-1 et seq.

2. Respondent agrees to pay Complainant \$20,000.00 (Twenty Thousand Dollars), settlement in this matter.

3. Respondent agrees to send a check in the amount of \$ 2,000.00 payable to Brian Peeke every Monday by over night mail for ten consecutive weeks. Respondent will send a copy of each check to the Division on Civil Rights on a weekly basis. The first \$ 2,000.00 payment will commence the first Monday after

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this document is signed by both parties. The final payment on week ten will also contain a federal tax 1099 document.

The above amount shall constitute full satisfaction of Complainant's claims for damages arising out of this matter.

4. Respondent agrees to give Complainant a neutral letter of reference

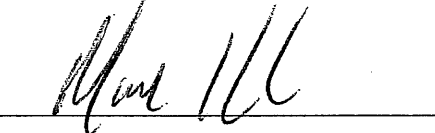
5. Respondent and Complainant agree not to engage in any retaliatory conduct against each other or any participant in these proceedings nor will the Respondent allow any of their employees to engage in any such conduct.

This Negotiated Settlement Agreement shall operate as a complete and final disposition of Complainant's Verified Complaint and any Equal Employment Opportunity Commission charge which may be pending, subject only to the fulfillment of all the foregoing provisions.



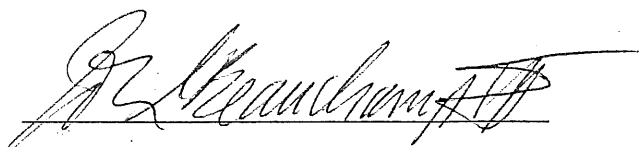
Brian Peeke

DATED 9-26-18



Mark Klein

DATED 9-20-18



(For the Division)

DATED 9/26/18