

**PAUL C. WILLIAMS**

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Plaintiff, Pro Se

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PAUL C. WILLIAMS,

Plaintiff,

vs.

NEW JERSEY REENTRY CORPORATION,  
its agents, servants, employees,  
JERSEY CITY EMPLOYMENT &  
TRAINING PROGRAM, its agents,  
servants, employees,  
JAMES E. MCGREEVEY,  
JOHN G. KOUFOS, and  
LINDSAY P. DUNNELLS-SHERSHENOVICH

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - OCEAN COUNTY

DOCKET NO.: L-967-18

CIVIL ACTION

FIRST AMENDED COMPLAINT

JURY TRIAL DEMANDED

Plaintiff, Paul C. Williams, residing in Toms River, Ocean County, State of New Jersey, by way of Complaint against the Defendants, alleges the following:

**I. INTRODUCTION**

This is an action brought pursuant to the New Jersey Law Against Discrimination (hereinafter referred to as "LAD"), N.J.S.A. 10:5-1, et seq.; alleging unlawful practices and unlawful discrimination, based on gender, in terms, conditions, and privileges of employment. Unlike perhaps most other similar actions, it is primarily based not upon the usual "he said, she

said," type of evidence but, instead, is largely based upon irrefutable evidence in the form of audio recordings, emails, and text messages.

It is brought against two separate yet interrelated corporations and numerous of their agents, servants, and employees, including James E. McGreevey, John G. Koufos, and Lindsay P. Dunnells-Shershenovich who all, individually and/or collectively, subjected Plaintiff, and/or allowed Plaintiff to be subjected, to differential treatment based on gender (Plaintiff is a male), reprisals against Plaintiff because he opposed practices and/or acts forbidden under the LAD, and who aided, abetted, incited, compelled or coerced the doing of any of the acts forbidden under the LAD or attempted to do so.

In December of 2015 and on the basis of Plaintiff's extensive and unique experience, knowledge, and understanding relating to prisoner reentry, the needs of incarcerated and formerly incarcerated and court-involved men and women to successfully transition into the community, the barriers to successful prisoner reentry, and the various public and private programs that are or could be instrumental in prisoner reentry, Plaintiff was offered, and he accepted, an opportunity to be employee of New Jersey Reentry Corporation (hereinafter referred to as "NJRC." After all, Plaintiff possessed nothing else, perhaps except for a G.E.D. and about a dozen college credits,

to qualify him for the employment opportunity and salary he had been offered.

Throughout Plaintiff's employment with NJRC, NJRC and Jersey City Employment and Training Program (hereinafter referred to as "JCETP") were separate corporate, 501(c)(3) nonprofit, entities yet they were operated and functioned in such a manner that they created and maintained a cognizable employee/employer relationship not only between NJRC and Plaintiff but also between JCETP and Plaintiff.

Also throughout Plaintiff's employment with NJRC, he was eager and enthusiastic to assist formerly incarcerated and court-involved men and women, competently and diligently performed every task assigned to him, and both dedicated and loyal to NJRC and to the clients and public whom NJRC was to serve.

Also throughout Plaintiff's employment with NJRC, neither he nor, to his knowledge, his colleagues were ever provided with an established employee handbook for either NJRC or JCETP or other written policies and procedures of NJRC or JCETP and everyone largely, for lack of a better phrase, operated and flew by the seat of their pants.

Within weeks of Plaintiff's employment with NJRC, he believed that he was, and would continue to be, treated adversely, and differently than his other co-workers who were

all female, by his immediate supervisor, a female, and on the basis of his being a male.

Plaintiff expressed his belief and concerns of being treated adversely and differently on the basis of his being a male, including the underlying facts and circumstances thereof, to his immediate supervisor and also the one-in-the-same NJRC Executive Director and JCETP Deputy Director.

Plaintiff's expression was protected conduct under the LAD.

Plaintiff's expression of his belief and concerns were initially responded to swiftly by the one-in-the-same NJRC Executive Director and JCETP Deputy Director but the response was more to discourage Plaintiff from pursuing the matter and to warn Plaintiff than to even investigate let alone resolve the basis for Plaintiff's belief and concerns.

Further and despite his known, demonstrated, and recognized ability and willingness to significantly and meaningfully contribute to NJRC, Plaintiff found himself being the subject of what was an ever increasing and eventually intolerable hostile work environment that was based on his being a male, reprisal for complaining about it, and without there being any established means for seeking redress; including, *but not limited to*, the following:

- a. Plaintiff's immediate supervisor, a female, advising Plaintiff that, as he was the only male in the office, he would have to "get use to" periods of hostility from his co-

workers when they were menstruating;

b. Several occasions where Plaintiff's immediate supervisor, a female, would say to him, and discuss in his presence, that she could "menace" men;

c. Plaintiff's immediate supervisor, a female, had discussed in his presence that she wanted to take a stiletto heel to, and rupture, her husband's scrotum;

d. Several occasions where Plaintiff's immediate supervisor, a female, would confront and scrutinize Plaintiff, in the presence of their co-workers, about any work-related advice or suggestions he would offer to their co-workers.

e. Several occasions where Plaintiff's immediate supervisor, a female, would essentially allow their co-workers to confront, scrutinize, critique, denigrate, and disrespect Plaintiff.

f. Several occasions where Plaintiff's immediate supervisor, a female, would inexplicably scrutinize and confront Plaintiff about things he was intending to have in and utilize in his office, prohibiting him from having the items (a second computer monitor and photographs he brought from home) in his office, but did not appear to do the same to their co-workers, all females, and even allowed his co-workers to hang in the office a poster of a political candidate and jeopardize the tax-exempt status of NJRC.

g. Several occasions where the one-in-the-same NJRC Executive Director and JCETP Deputy Director would subject Plaintiff, in the presence of his co-workers and other NJRC and JCETP employees, to various forms, including but not limited to verbal comments and group text messages and memes, of ridicule and humiliation under the guise of joking about Plaintiff's passion for prisoner reentry work and about Plaintiff's complaints and that he did not do to any female employees;

h. Defendants requested, attempted to cajole, and insisted that Plaintiff accept an adverse change in his work conditions, under the threat of his employment being terminated; specifically to transfer from working in the Toms River office to the Jersey City office.

Plaintiff eventually became increasingly frustrated,

depressed, anxious and intolerant about the hostile work environment he was being subjected to.

Despite Plaintiff's known, demonstrated, and recognized ability and willingness to significantly and meaningfully contribute to NJRC, he was terminated from his employment with NJRC, when he refused to accept an adverse change in his work conditions and which was specifically to transfer from working in the Toms River office to the Jersey City office in reprisal to his complaints and his increasing intolerance for the hostile work environment he was being subjected to.

Plaintiff's refusal to accept an adverse change in his work conditions was protected conduct under the LAD.

The decision to terminate Plaintiff's employment was motivated by and/or determined by Plaintiff being a male and/or was causally connected to Plaintiff's objections to the hostile work environment he was being subjected to.

The stated reason and any other reason offered by Defendants as justification for Plaintiff's employment being terminated is patently pretext.

Fortunately, New Jersey provides redress for victims of such invidious discrimination, harassment, and retaliation. Accordingly, Plaintiff brings this lawsuit under the LAD to seek redress of his right to work in an environment free from discrimination, harassment, and retaliation.

## II. JURISDICTION AND VENUE

1. The Court has original jurisdiction over this matter because the action seeks to vindicate rights protected by the laws and Constitution of the State of New Jersey.

2. Venue is proper in the Ocean County Vicinage, pursuant to R. 4:3-2(a), because Plaintiff is located in such county and events giving rise to the claims herein occurred within such county.

## III. PARTIES

3. Paul C. Williams (hereinafter referred to as "Plaintiff") was, at all times relevant hereto, a United States citizen, residing in Toms River, County of Ocean, State of New Jersey, and employed as a Case Manager with the New Jersey Reentry Corporation for its Toms River location situated at 310 Main St, Toms River, New Jersey.

4. Defendant, New Jersey Reentry Corporation (hereinafter referred to as "NJRC"), was, at all times relevant hereto, a New Jersey nonprofit corporation, with a principal office in Jersey City, New Jersey, employed Plaintiff, and shared space, staff, equipment, policies, practices, and training with the JCETP.

5. Defendant, Jersey City Employment and Training Program (hereinafter referred to as "JCETP"), was, at all times referred to herein, a New Jersey nonprofit corporation, with a principal office in Jersey City, New Jersey and shared space, staff,

equipment, policies, practices, and training with the NJRC.

6. Defendant, James E. McGreevey (hereinafter referred to as "McGreevey"), was, at all times relevant hereto, the Executive Director of the JCETP and the Chairman of the Board for the NJRC and responsible for the hiring, firing, training, supervision, and discipline of JCETP and NJRC staff and establishing policies and practices of the JCETP and NJRC.

7. Defendant, John G. Koufos (hereinafter referred to as "Koufos"), was, at all times relevant hereto, the Deputy Director of the JCETP and the Executive Director of the NJRC and responsible for the hiring, firing, training, supervision, and discipline of JCETP and NJRC staff and establishing policies and practices of the JCETP and NJRC.

8. Defendant, Lindsay Dunnell-Shershenovich (hereinafter referred to as "Dunnells"), was, at all times relevant hereto, was the Facility Director of the Toms River location for the NJRC and, as Facility Director, the superior of all other employees at the Toms River location of the NJRC.

9. At all relevant times, Defendants NJRC and JCETP have been single and joint employers of Plaintiff within the meaning of the LAD. Upon information and belief, NJRC and JCETP operations were interrelated and unified, and they shared common management, centralized control of labor relations, common control, common business purposes, and interrelated business



goals. In addition, they jointly determined and managed the pay practices, rates of employee pay and method of payment, maintenance of employee records and personnel policies, practices and decisions with respect to the employees.

**IV. FACTUAL ALLEGATIONS**

10. JCETP, originally named as the "Private Industry Council," was incorporated in 1985 and its purpose was/is to "provide employment and training activities and ancillary services; and governance and administration for the Job Training and Partnership Act (29 USC [sec.] 1501 et seq.) in the Jersey City Service Delivery Area." In September of 2014, it opened a office space known as "Martin's Place" and was located at 398 Martin L. King Jr. Boulevard, Jersey City NJ.

11. McGreevey is a male and has a long and pervasive presence in New Jersey government and politics; going back to the early 1980's and having served as an Assistant Prosecutor in Middlesex County, an the Executive Director of the New Jersey State Parole Board, and a Professor at Kean University; elected and served as a member of the New Jersey General Assembly from 1990 to 1992, Mayor of Woodbridge Township from 1992 to 1999, member of the New Jersey Senate from 1994 to 1998, and as Governor of the State of New Jersey from 2002 until, in a sudden and spectacular fashion that made national news and has been the

subject of several books and videos and national talk shows, announcing his resignation in 2004.

12. Koufos is a male and was once was an attorney in good standing in New Jersey from 2003 until, in connection with his commission of several crimes, being disbarred in 2015.

13. Dunnells is a female and appearing to be a graduate of Brick Township High School's Class of 2001, moved and went on to college in Connecticut where, in 2005, she obtained her Bachelor of Arts degree in Psychology and then went on to move and go to school in New York where, in 2007, she obtained her Master's degree in Social Work; further obtaining and maintaining employment in New York until December of 2015.

14. Plaintiff is a male and, having an extensive history as a defendant in juvenile delinquency and adult criminal matters, has been incarcerated and released from several county jails and state prison on multiple occasions; having been abandoned to the state when he was nine (9) years of age and has never had any family or other support system to assist him in making his numerous transitions from jail or prison to the community as success.

15. Plaintiff once served a period of ten and a half years imprisonment from early 1992 to 2002. During that time, he came to understand the need for prisoner reentry assistance and services and how the lack thereof for him was a significant

contributor to his, and other similarly situated men and women, adult criminal behavior. Also during that time, he was assigned to work in the prison law library and, having access to the federal and state legislation that had dramatically changed the public assistance programs during the years of 1996 and 1997, he realized that there was public assistance programs that could be instrumental in assisting him, and other similarly situated men and women, to successfully transition from incarceration to the community and he thorough familiarized himself with the federal and state statutes and regulations prescribing that system.

16. During Plaintiff's imprisonment and equipped with the 1996 and 1997 legislation and other sources of information, he assisted at least dozens of fellow prisoners prepare for their release by providing them with information about public assistance programs, helping them understand the information, and encouraging them to use the information to go on to live law-abiding and productive lives after their release.

17. In December of 2002, Plaintiff appeared at a forum on poverty in Ocean County that was held before the Board of Chosen Freeholders, publicly introduced himself, and essentially begged that something be done for the men and women like him that get released and want to do the right thing but have no help. By this time and despite all the despite all the information he possessed that, in theory, could be instrumental in assisting

him, and other similarly situated men and women, to successfully transition from incarceration to the community, Plaintiff had already been arrested again would eventually go on to commit additional crimes.

18. In 2005, Plaintiff would be convicted of having committed several crimes, was sentenced to serve another period of imprisonment, and would have numerous additional charges still pending.

19. In or around 2006, Plaintiff had the first occasion to meet Koufos. At the time, Plaintiff had been brought before the Court, representing himself, regarding additional charges and Koufos was present in the courtroom regarding another client. Plaintiff and Koufos happen to talk with each other and agreed to keep in touch. Thereafter, Plaintiff and Koufos would keep in touch sporadically, discussing matters of law and the prospect of Koufos hiring Plaintiff as a legal assistance upon Plaintiff's release, and Plaintiff would refer potential clients to Koufos' law firm.

20. In June of 2011, Koufos would himself commit several crimes and he was arrested.

21. Approximately two months after his June 2011 arrest and while released on bail, Koufos came to visit Plaintiff who was still incarcerated.

22. In October of 2011, Plaintiff was released from

incarceration.

23. Since his release, Plaintiff began assisting numerous formerly incarcerated and court involved men and women to successfully transition to the community, as well as assisting the families and loved ones of those men and women to know and understand how to be of assistance; using his thorough knowledge and understanding of the various government prescribed public assistance programs and having gained a better understanding of the practical application of those programs, the availability and practical application of other similar resources, and the invaluable benefit of even a guiding hand and empathetic ear that can all be instrumental to assist formally incarcerated men and women successfully transition into the community.

24. In May of 2012, Plaintiff incorporated "Project HEURISTIC" which had the purpose of assisting formerly incarcerated men and women successfully transition to the community in and around Ocean County NJ.

25. Also in May of 2012, Koufos was sentenced to serve a term in state prison relating to his June 2011 crimes.

26. In May of 2013, Jersey City elected Steven Fulop as its Mayor and, shortly thereafter, Fulop announced that McGreevey would take over as Executive Director of JCETP; notwithstanding the fact that the JCETP Board of Directors, not the Mayor, hires and fires its employees.

27. In September of 2013, the JCETP Board of Directors approved hiring of McGreevey as its Executive Director and paying him a salary of approximately \$110,000.00 a year.

28. In October of 2013, Koufos was released from state prison.

29. On November 6, 2013, Plaintiff sent Koufos a message through the social media site known as "LinkedIn;" stating: "Glad to see you're out. Call me \* \* \* ;" providing his cellphone number. Also on November 6, 2013, Koufos replied to Plaintiff's message; stating: "Thanks brother I will call you this week. My cell is \* \* \* ;" providing his cellphone number. Thereafter, Koufos and Plaintiff again kept in sporadic contact.

30. On or about September 2, 2014 and being less than a year since being released from state prison, Koufos became an employee of McGreevey, at JCETP and in the capacity of Deputy Director, and paid a starting salary of approximately \$70,000.00 a year for fiscal year 2013-14 and then \$90,000.00 a year for fiscal year 2014-15.

31. On September 15, 2014, Plaintiff met with Koufos at the Grand Opening of "Martin's Place" which and served as the new principle location of JCETP and that specifically targeted its focus toward the formerly incarcerated and court-involved residents of Jersey City; being attended by hundreds of people and included many local, statewide, and national political

dignitaries.

32. On or about October 22, 2014, McGreevey incorporated NJRC, using the address of Martin's Place as the registered business address, and with the first Board of Trustees consisting of Edwin T. Chinery, Leslie K. Franks McRae, and Thomas Calcagni, Esq.. Additional Trustees were added soon thereafter and included Joseph Hayden, Esq., Michael Kempner, Bishop Reginald T. Jackson, Chief Justice Deborah Poritz (Ret.), Governor John Corzine, Governor James Florio, Governor Thomas Kean, and Governor Brendan Byrne, with McGreevey being Chairman of the Board and Koufos also being hired as the Executive Director and paid a salary of approximately \$60,000.00 a year.

33. While McGreevey and Koufos, in their respective capacities of NJRC Chairman and NJRC Executive Director, pursued and built the interests of NJRC, they simultaneously also maintained their respective positions as JCETP Executive Director and JCETP Deputy Director.

34. On February 28, 2015, Plaintiff met with Koufos at a conference by the New Jersey State Bar Association's Young Lawyers Division.

35. On June 28, 2015, Plaintiff met with Koufos and Katie O'Malley, the then Deputy Counsel to the Hudson County Department of Corrections and would become the General Counsel to JCETP in September of 2015, at "Empire," a café located at

338 Bloomfield Street, Hoboken NJ.

36. On July 21, 2015, Plaintiff met with Koufos at and attended a soft-opening of Community Resource Center which was intended to be a day reporting center contracted with the New Jersey State Parole Board at the Sacred Heart Church in Jersey City NJ.

37. On November 24, 2015, Plaintiff met with Koufos at the Newark Greater Conservancy.

38. In December of 2015, NJRC became acknowledged by the Internal Revenue Service as a 501(c)(3) tax-exempt organization.

39. Also in December of 2015, Koufos called Plaintiff and inquired if Plaintiff would be interested in interviewing for a position as a Case Manager with the NJRC. Plaintiff answered affirmatively and scheduled to be interviewed on December 14, 2015 at Martin's Place.

40. On December 12, 2015, Koufos, in reference to Plaintiff's upcoming interview, sent Plaintiff a text message; stating:

"You good for Monday? This is important to get you hired. Extra copies of resume. Phone on silent (not vibrate). Suit. White shirt. Tie. No blue tooth. Pen. Talk about your daughter and how she's your motivation to do right (Jim loves that).

It all seems so basic I'm not trying to talk shit I want you to do well."

41. On December 14, 2015, both Plaintiff and Dunnells



appeared at Martin's Place and were both offered, and accepted, an employment opportunity with the NJRC, for the then impending opening of a NJRC location in Toms River, New Jersey.

Plaintiff's employment offer was for a Case Manager position and Dunnell's offer was for a Facility Director position.

42. Also on December 14, 2015, other persons, particularly including Jada Fulmore and Anakaren Millan, were also each offered, and both accepted, employment opportunity with the NJRC for the then impending opening of a NJRC location in Paterson, New Jersey; Fulmore's employment offer was for a Employment Specialist position and Millan's employment offer was for a Case Manager position.

43. In the afternoon of December 14, 2015, Plaintiff sent Koufos a text message; stating:

"Thanks again bro ... I really appreciate the trust and faith youre giving me and I'm really looking forward to getting this work going ..."

To which Koufos responded:

"Welcome to the Empire my brotha  
"I told you: we take care of us first"

44. On December 23, 2015, Plaintiff sent an email to a JCETP employee, Cherina Romage, *using the JCETP email address of "cromage@jcetp.org"* and, therein, included copies of several personal documents, consisting of Plaintiff's "Employment Eligibility Verification," "Form W-4," "Social Security Card,"

"Certificate of Birth" and "Driver License" which all she had requested Plaintiff to fill out and return to her.

45. On the morning of December 28, 2015 and before leaving his home to go to his first day of work as a Case Manager for NJRC, Plaintiff posted on social media:

"Today, I have the distinct pleasure of waking up and actually being happy to go to work; having been offered a job as a Reentry Case Manager and being the kind of work that I have been passionately pursuing for many, many, years for not only myself but also for my community and those who are in the extremely difficult position that I have been in at least a dozen times. I am extremely thankful and grateful for this opportunity and looking forward to doing for others what I desperately needed someone to do for me ... Offering a guiding sort of hand through the process of reentry to the community."

46. On December 28, 2015, both Plaintiff and Dunnells began their employment with NJRC; reporting to Martin's Place, as the Toms River office had not yet been located and opened.

47. Also on December 28, 2015, both Fulmore and Millan began their employment with NJRC; reporting to Martin's Place, as the Paterson office had not yet been opened.

48. On December 29, 2015, Koufos, using the JCEPT email address of "jkoufos@jcetp.org," sent an email, with the subject thereof being indicated as "NJRC Training," to Plaintiff, Dunnells, Fulmore, and Millan and also copying the email to JCEPT employees Shae Cali (*using scali@jcetp.org as the email address*), Helena Muhammad (*using hmuhammad@jcetp.org as the*

*email address*), Michael Lacy (*using mlacy@jcetonline.org as the email address*), and Katie O'Malley (*using komalley@jcetp.org as the email address*). Therein, Koufos identified himself as an employee of JCETP as follows:

“Deputy/Reentry Director  
Jersey City Employment & Training Program  
398 Martin Luther King Jr. Drive  
Jersey City, New Jersey 07305  
Phone: 551.222.4341  
Cell: 732.600.3825  
Fax: 201.630.4187  
Website: [www.jcetp.org](http://www.jcetp.org)”

and instructed everyone regarding what he referred to as a “training schedule.”

49. On December 30, 2015, Millan forwarded to Plaintiff and Fulmore an email that had been forwarded to her from Shae Cali (*using scali@jcetp.org as the email address*) and that originated from Michael Lacy (*using mlacy@jcetonline.org as the email address*), to Koufos (*using jkoufos@jcetonline.org as the email address*), Jessica Manla (*using jmanla@njreentry.org as the email address*), Shae Cali (*using scali@jcetp.org as the email address*), Marie Pryor (*using mpryor@jcetonline.org as the email address*), and Katie O'Malley (*using komally@jcetonline.org as the email address*), and wherein Lacy stated:

“Please find attached *the draft* of the NJRC Manual which may be provided today to NJRC staff.”

(emphasis added).

50. As Plaintiff began working as an employee of NJRC, he

began to realize that, in the more than a year since it had been incorporated, NJRC had not yet formally promulgated and finally established any written policies or procedures, an actual employee handbook, any actual training and particularly not with regard to the actual duties, responsibilities, and functions of employees or regarding the mission of NJRC and how employees were to be instrumental in achieving the mission of NJRC. Nevertheless and especially because the need for prisoner reentry assistance and services had long been a personal matter for him and he literally cherished the opportunity he had to work for NJRC, Plaintiff eagerly sought to be of assistance.

51. On January 4, 2016, Plaintiff had difficulty logging in to the system for NJRC employees and, in that regard, sent an email to Michael Lacy, the person apparently designated to manage employee access to the system, at *mlacy@jcetonline.org*. Lacy responded using the aforesaid email address and identified himself as an employee of JCETP as follows:

"Digital Media and Analytics Coordinator  
Jersey City Employment & Training Program  
398 Martin Luther King Jr. Drive  
Jersey City, New Jersey 07305  
Phone: 551.222.4336  
Fax: 201.630.4187  
Website: *www.jcetp.org*"

52. On January 5, 2016, Cherina Romage *using another JCEPT email address of "cromage@jcetonline.org,"* sent an email, with the subject thereof being indicated as "Time sheets," to

Plaintiff and, therein, advised Plaintiff that she attached time sheets for the next two weeks and, afterwards, he will begin to print his own time sheets by changing the dates according to the pay period. Romage also identified herself as an employee of JCETP as follows:

"Intake/HR Coordinator  
Jersey City Employment & Training Program  
398 Martin Luther King Jr. Drive  
Jersey City, New Jersey 07305  
Phone: 551.222.4336  
Fax: 201.630.4187  
Website: www.jcetp.org"

53. At approximately 9:08am on Saturday, January 9, 2016, Plaintiff addressed and sent an email to Lacy; stating:

"Mike,

Just a reminder ... I'm going through the policy and procedure handbook as much as I can this morning and throughout the weekend, already in it since I woke up, and I will forward it to you ASAP."

Lacy responded at approximately 9:09am, January 9, 2016; stating:

"Thank you, Paul. This will be invaluable. It's been a pleasure working with you thus far."

This was also during both Plaintiff's and Lacy's day off.

54. On January 14, 2016, Lacy sent another email to Plaintiff and wherein he stated:

"Thanks, Paul. You're a huge help! This is really gonna get us off the ground running."

55. On January 19, 2016, Lacy sent an email to Plaintiff, Dunnells, Fulmore, and another NJRC employee; stating:

"Please forward these documents to any NJRC employees who will need access to them. These are the standard documents needed for delivering services. Please let me know if you are not seeing files which you will be needing."

56. Also on January 19, 2016, Lacy sent another email to Plaintiff and wherein he stated:

"Hi, Paul. Could you inform Rebecca Tobin that her email rtobin@njreentry.org has been generated and assist her with logging into her email?"

57. Initially, Plaintiff and Dunnells were the only NJRC employees hired for the Toms River location and, until the Toms River location was found and opened, they both, residing in Ocean County NJ, commuted to Martin's Place.

58. After a week of commuting to Jersey City, Plaintiff suggested to Dunnells that they commute together, Dunnells agreed, and they began commuting together on January 5, 2016.

59. Throughout the following couple of weeks, four additional people (Sabrina Salanitro, Bianca Sangiovanni, Rebecca "Becky" Tobin, and Brenna Haase) were also hired for the still to be found and opened Toms River location and, except for Bianca, all commuted to/from Jersey City together; being all residents of Ocean County NJ.

60. Salanitro was hired as a Case Manager, Sangiovanni was hired as an Employment Specialist, Tobin was hired as an Employment Specialist, and Haase was hired as the Intake Coordinator.

61. In sum, Plaintiff was the only male employee of the NJRC for the Toms River location.

62. As each new person was hired, they all, except Sangiovanni, joined the carpool.

63. Also throughout the following couple of weeks, it had increasingly become suspicious to Plaintiff that he was perhaps being treated differently by his coworkers and particularly including Dunnells.

64. Throughout Plaintiff's employment with NJRC, there were several occasions when Dunnells engaged in conversations with, and/or in the presence of, Plaintiff and wherein she made statements about being able to "menace" men.

65. Throughout Plaintiff's employment with NJRC, there was one specific occasion when Dunnells engaged in conversation in the presence of Plaintiff and wherein she seemed to Plaintiff as denigrating the work of Social Workers and stated that she could "menace" a Columbia University professor, a male, who had come to speak with the employees about "Motivational Interviewing."

66. Throughout Plaintiff's employment with NJRC, there was one specific occasion when Dunnells engaged in conversation in the presence of Plaintiff and wherein she stated that she wants to take a stiletto heel and burst her husband's scrotum.

67. Throughout Plaintiff's employment with NJRC, there was a couple of occasions where Dunnells engaged in conversations

with, and/or in the presence of, Plaintiff and wherein she referred to Lacy, a male, as a "twink" that she could "menace" him.

68. On January 13, 2015, Koufos, using another JCEPT email address of "jceonline.org," sent an email, with the subject thereof being indicated as "MTG/TOUR - Elijah's Promise @ Wed Jan 20, 2016," to Plaintiff, Dunnells, Haase, Sangiovanni, Salanitro, Fulmore, Millan and Cali. Therein, Koufos invited the recipients to a meeting and tour of Elijah's Promise Inc. at 211 Livingston Avenue, New Brunswick NJ at 1:30pm on January 20, 2016.

69. In the morning of January 20, 2016, Plaintiff drove Dunnells, Haase, Salanitro, and Tobin to work at the Jersey City office.

70. While at the office in the morning of January 20, 2016, Plaintiff made a comment to Dunnells about the lack of productivity by himself and his co-workers being caused by one of the co-workers holding up information and that nobody would say anything about it to her out of concern of ruffling her feelings because of her perceived close friend/acquaintance of McGreevey. The co-worker was Haase and who often bragged of, and demonstrated, to the colleagues her close relationship with McGreevey prior to her employment. Haase was not present when Plaintiff made the particular comment but Salanitro was and



proceeded to tell Haase.

71. In the afternoon of January 20, 2016, Plaintiff and his co-workers had to go to a meeting in New Brunswick (see Paragraph #68 above) and, since he was driving this day, he was obliged to drive his co-workers there also.

72. As Plaintiff was waiting in his car for his colleagues, Tobin was the first to get in and asked Plaintiff if there were already "cliques" among the six co-workers, Dunnells would get in a few minutes later, and we would eventually realize that Haase and Salanitro were suddenly going to ride to the meeting with Sangiovanni.

73. In the afternoon of January 20, 2016 and after the meeting, Dunnells and Tobin were in Plaintiff's vehicle waiting for Haase and Salanitro for the commute home when he received a text message from Haase that advised that she and Salanitro were going to ride with Sangiovanni.

74. The text message from Haase resulted in Dunnells and Haase to exchange text messages and from which Dunnells advised Plaintiff that Haase apologized and blamed it on "having her period."

75. In furtherance of what is described in Paragraph #74 above, Dunnells further advised Plaintiff that, as the only man on the Toms River team, he is going to have to learn to deal with all the hostility of his female colleagues when they have

their menstrual cycles and that, because they are working together, it will eventually start occurring at the same time.

76. Taking what Dunnells advised in Paragraph #75 as a joke, Plaintiff responded, also jokingly, by saying that he was fine with that as long as he gets "to call them bitches."

77. Responding quickly and with what appeared aggressively and hostile to Plaintiff's response to Dunnells', Dunnells insisted that Plaintiff absolutely cannot respond that way, referenced something about domestic violence training she has had, and further insisted that Plaintiff is not ever allowed to talk to women like that.

78. Based on suspicions Plaintiff had been having the past couple weeks and then the facts and circumstances described in Paragraphs #75 through #77 above, Plaintiff became even more concerned that he was being treated differently because he was the only male among the staff of the Toms River location by not only his colleagues but particularly by the leadership of Dunnells.

79. Plaintiff's concerns described in Paragraph #78 above were so heightened that Plaintiff thoroughly expressed them to Dunnells in an email and shared it with Koufos.

80. Koufos called Plaintiff in reference to the writing referred to in Paragraph #79 above, discussed the situation, and warned Plaintiff about the potential consequences of making such

allegations; specifically suggesting that, although Plaintiff could not be immediately fired for making such allegations, making such allegations essentially puts a "bull's-eye" on Plaintiff and, because New Jersey is an "at will" employment state, he may be suddenly fired in a couple months.

81. Heeding the warning of Koufos as described in Paragraph #80 above and mostly because Plaintiff genuinely loved the work he was being entrusted to do so much that he did not want to be fired, Plaintiff immediately began attempts to ignore his concerns, to tolerate his being treated differently than his female colleagues, and to make a concerted effort to ingratiate himself with Dunnells and dispel any concerns his written concerns may have created for her.

82. In the evening of January 21, 2016, Plaintiff sent an email to Dunnells attempting to clarify some information that they and their co-workers had been working on and provided as housing resources for clients. More specifically, Plaintiff wrote:

"Attached is the list of motels we have been working with the past 2 days. Most include the number of rooms each motel has.

"A few motels were included by me to the list we were provided. However, it is important to keep in mind that whether any or all of these listed are actual vendors for the Ocean County Department of Social Services' Special Response Unit SHOULD NOT be taken for granted; considering that the list provided by the "source" at Social Service included at least the "Comfort Inn" and

which I know, from actually being one of the last clients of Social Services to be housed at the Comfort Inn, STOPPED being a vendor several years ago and kicked out all Special Response residents in early 2012. The point is somewhere in the fact that the list is clearly not up-to-date by several years.

"In any event, those locations, as well as many others throughout Ocean County that have yet to be identified and included beyond the simple "list" we were provided, should be viewed as potential locations that can be approached by John and presented with the proposal to provide housing for our clients. Any of those locations, and others yet to be identified, can relatively easily become vendors for the Special Response Unit.

"If there is any question about this, please feel free to address me with it."

To which Dunnells essentially chastised Plaintiff:

"Thank you for this.

"But how come there are so many quote/unquotes?

"Please trust that we are a team and all very capable of doing things to ensure the mission of NJRC is upheld. Everyone has their part and no one person can do it all, nor should one person do it all. Part of the success of a team is everyone's input and their various approaches - all which should be respected and not undermined. There is a level of condescension implied in this email that is off putting. I know your intentions are good, but the delivery needs refinement if the Toms River team has any chance of cohesion.

"We can speak further about this in the morning if necessary."

83. Plaintiff was dumbfounded and concerned by Dunnells' response; considering that she proceeded to refer to only three quote/unquotes in the entire email as "so many" and also proceed to sort of explain some things, that did not appear to need any explaining, in an accusatory and insinuating manner, while also

being inexplicably critical of Plaintiff's simple effort to ensure his colleagues were cautious about the information they were poised to rely on to assist their clients that were in need of housing assistance.

84. Plaintiff's concerns about how he was and could be treated by Dunnells weighed so heavily on him that he could not sleep and, at 1:10am on February 22, 2016, he sent a group text to Dunnells, Sangiovanni, Haase, Salanitro and Tobin; stating:

"Hope this doesn't wake anyone and I apologize for the inconvenience otherwise but I have been up so far mulling a lot of things in my head and want to let you guys know that I wont be carpooling this morning."

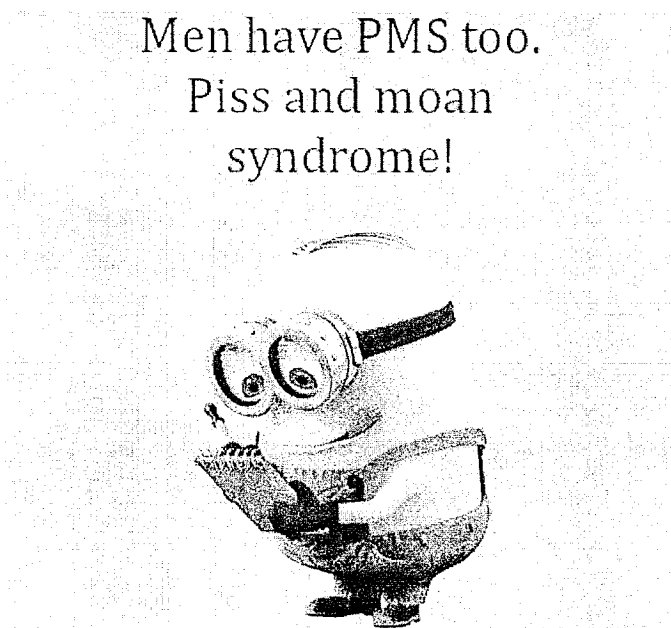
85. Also during the early morning hours of February 22, 2016, Plaintiff sent an email to Dunnells; stating:

"Lindsay,  
Just to possibly make a little clearer for you that I was already pretty much over the whole thing with [Haase's] Wednesday antics, trying to move on from it, and had no intentions with my email to you to be what you categorized it, I'm sending you the screen shot of a text conversation I started with [Haase] while we were all in the car on our way home tonight; suggesting that we go to school together to get out CACD certifications ... "

86. In the morning of January 22, 2016, Plaintiff met with Dunnells and several of their co-workers at the office and appeared to address and resolve the situation; promptly Plaintiff to send a text message to Koufos and wherein he stated:

"FYI ... All is resolved ... Lindsay got us through the shit in the air."

87. On January 23, 2016, Plaintiff sent Dunnells a meme through a text message, as a gesture of humor about the conversation referenced above in Paragraphs #75 through #77 that they had on January 20, 2016, and consisted of an image with the words "Men have PMS too. Piss and moan syndrome!" and appears as the following image:



to which Dunnells replied: "Haha"

88. Notwithstanding words and gestures to demonstrate that all was resolved, Plaintiff remained concerned about how Dunnells had been and may continue to treat him; so, Plaintiff then began frequently carrying a micro-recorder in his shirt pocket and audio recording his interactions while at work and while interacting with co-workers.

89. In the morning of February 1, 2016 and following a

group text exchange the evening before and wherein Plaintiff perceived that he was slighted by Dunnells in the presence of co-workers, Plaintiff sent a text message to Dunnells; stating:

"Actually ... I'm not sorry; I was being overly subservient and completely fake by saying "I'm sorry," because I offered a suggestion that I believe is a good idea and simply saying "we're not recording anything" not only did nothing to change my belief but also seemed blatantly disrespectful, condescending, and undermining of my well-intentioned effort to help this "so-called" team that I'm apparently still not a genuine member of. Apparently, I'm not valued at all and am more just a presence to be temporarily tolerated to a very small degree.

"Well ... I'm not sorry that I genuinely care about 'Reentry,' as a whole and not just drug addiction and recovery, for NJ and particularly Ocean County (it was 13 years ago when the Asbury park press covered an event I was at and where I was quoted as asking for something to be done for those that want to come home to live law abiding and productive lives) and especially in Ocean County (the place that has been my home my entire life and where I have been doing Reentry work for over 4 years albeit on a very small level). I'm not sorry for being in-tune with the fact that crime and recidivism is a result of many other components beyond drug addiction and recovery but also socio-economics and mental health conditions. I'm not sorry that I genuinely want everyone, including me, to not just show up to just a job and muddle through it without a real idea of what we are talking about (bsing the clients and selling them a bunch of bs dreams), that I want everyone to do their job well so that they don't get in trouble or fired and our office is the shining example it has the potential to be, and that I want everyone to have a legit basis for pride in what they are doing and aren't bsing themselves or anyone else. I'm not sorry that, apparently, I'm the only one not worried about being recorded doing my job and not worried about but inviting critique so that I can do my job better

"Enjoy the carpool drive into work with the genuine members of the "team" ... I'm sure I'll be spoken of

fondly, as usual"

to which Dunnells replied:

"I'm not going to have this conversation through text - we can talk at work. There are reasons why nothing should be recorded and I will gladly explain - just not through texts at 930ish pm or 630ish am"

to which Plaintiff replied:

"Well ... THAT is a reply that wouldn't have appeared as disrespectful, condescending, and undermining as what you said last night ... I'm already treated as an outcast by my "teammates" and have a tremendously better rapport with everyone in jersey city and Paterson which speaks volumes about whether the problem is within me or the "click" that has been created and allowed to grow within the toms river team ... And while I do not expect any boss of mine to explain themselves to me, it is sometimes the right thing to do so that I can understand what's expected encouraged and discouraged but I am looking forward to hearing at least one good reason why our presentations should not be recorded for you and John to critique; considering that everything is recorded without audio anyway"

90. Several hours thereafter and while being dressed in a usual suit and tie, Plaintiff was suddenly instructed by Dunnells to leave the Jersey City office, go to the Paterson office of the NJRC, and help with some physical labor that was needed there.

91. As instructed, Plaintiff went to the Paterson office and assisted with moving furniture and putting together multiple desks.

92. As a result of having to go to the Paterson office and perform the needed manual labor, Plaintiff ruined his suit



pants, his shirt, and dress shoes and did not get home until approximately 8:00pm which was approximately three hours later than usual.

93. At approximately 9:42pm, Plaintiff sent a text message to Dunnells; stating:

"Good night, boss ... I was kinda looking forward to talking with you this morning (or just getting yelled at) but then I realized we wouldn't get to before orientation and then I was sent to Paterson. Maybe you can call me after work tomorrow or just wait until Wednesday!? Either way, I'd def like to get your critique of my presentation this morning ... I had "things" on my mind early on and my PowerPoint isn't ready so I muddled through it. Ttys"

94. On February 2, 2016, Plaintiff again reported to the Paterson office to perform additional physical labor and did not get home until approximately 9:00pm.

95. Neither Dunnells nor any of the female co-workers were required to go the Paterson office or any office to perform physical labor or to work longer than usual hours.

96. At 7:38pm, Plaintiff sent a text message to Dunnells; stating:

"Leaving Paterson now. Jessica needs me [in Paterson] again tomorrow but I told her that, foremost, I have to check with you and, in any event, I have to leave by 11-1130 at the latest. I think she understands that I'm not going to be as useful as she needs tomorrow but it's your call. Another thing I need you to consider and let me know ASAP is it ok with you if I ask John if I can just take the day off tomorrow since I'll be in jc only half the day anyway and put in extra hours the last 2 days?"

to which Dunnells replied:

"I know you've worked extra hours the last two days which NJRC appreciates immensely but I'd prefer if you came in for the morning because we need to chat about a few things and I don't want to prolong it another day"

97. On February 11, 2016, neither Plaintiff nor his co-workers were required to report to the Jersey City office, had the afternoon to do as they pleased, and Plaintiff took the initiative to look for an alternative office space than the current space that, as he was made to understand it, was being delayed with negotiations.

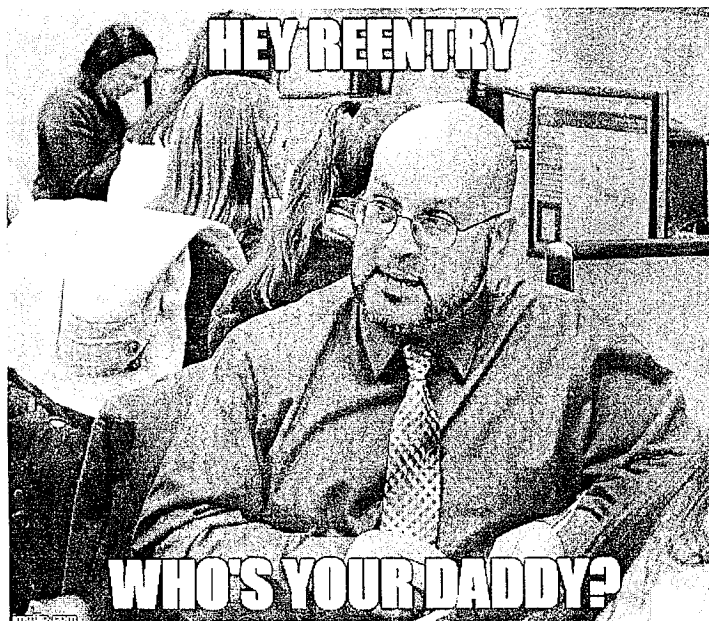
98. In the afternoon of February 11, 2016, Plaintiff approached the owner of an office building located at 310 Main St, Toms River NJ, and inquired about office space therein that was advertised as available for lease; resulting in an exchange of numerous text messages between Koufos and Plaintiff that afternoon and with Plaintiff having initiated the agreement that would ultimately be struck for the lease of the office space at 310 Main St to NJRC.

99. In the evening of February 11, 2016, both Koufos and Dunnells both informed Plaintiff that he would be meeting them at 310 Main St the following morning and that everyone else was to report to Jersey City.

100. On February 12, 2016, Plaintiff met with Koufos and Dunnells and the owner of 310 Main St; walking through the location and discussing it and the terms of a lease.

101. On February 17, 2016, Plaintiff, Dunnells, and colleagues were situated in a large hallway at the Jersey City office when Koufos suddenly approaches, begins to make Plaintiff the focus of discussion in front of his colleagues and passers-byers, and proceeds for more than a half-hour to say things to and about Plaintiff that were a mixture of true, false, and exaggerated, in a full display of perhaps joking or ridicule; including telling everyone that Plaintiff believes he (Plaintiff) is the Father of Reentry.

102. Thereafter, Plaintiff, Dunnells, and their co-workers were in Plaintiff's car on their way home when, at 4:34pm, both Plaintiff and Dunnells received a group text with a meme from Koufos; consisting of a photo of Plaintiff and including the words "HEY REENTRY WHO'S YOUR DADDY?" and appears as the following image:



103. Dunnells immediately shows Plaintiff and responds to Koufos; stating:

"He almost crashed the car  
"But this is absolutely amazing"

104. Dunnells also proceeded showed the meme to everyone else in Plaintiff's car and furthered Plaintiff being the brunt of jokes and comments.

105. At 5:51pm on February 17, 2016, Plaintiff sent a text message to Koufos with reference to Koufos' behavior toward Plaintiff that afternoon; stating:

"I deserve a huge raise for putting up with your ad nosium ridicule to everyone today and about something I NEVER said and that other people might believe is true ... It was good for laughs but you're still a Jerk off for it lol"

to which Koufos replied:

"It was good for the team and it reinforced that we are tight. I only joke w you and Bianca and now they all know it."

106. In the evening of February 18, 2016, Koufos sent a text message to Plaintiff with regard to the perception that upper management employees of JCETP had of Plaintiff; stating:

"In fact, Gerry DelPiano told Marie that you were the boss in Toms River. That was his perception."

107. Plaintiff was concerned about being perceived as "the boss in Toms River" because, to him, it would tend to give further reason for Dunnells to want to assert control and dominance over Plaintiff and continue to subject Plaintiff to

discrimination and harassment.

108. Throughout Plaintiff's employment with NJRC, co-workers, Sangiovanni and Tobin, engaged in conversation in the presence of Dunnells and Plaintiff and wherein they spoke about decorating the office they were going to share at the soon to be opened Toms River location and one of them stated that they had already ordered a poster of a current presidential candidate to hang on the wall. Dunnells then, in the presence of Plaintiff, advised Sangiovanni and Tobin that they cannot have such a poster in the office at all. Plaintiff was cognizant that displaying such a poster in the office of a nonprofit agency such as NJRC would constitute endorsing a political candidate and, therefore, could threaten and jeopardize the tax-exempt status of the NJRC.

109. In the morning of February 20, 2016, Koufos sent Plaintiff a text message wherein he, in pertinent part, stated:

"I will call you at 10a. I'd like to talk more about [Haase]."

110. Koufos and Plaintiff, given the extent of the history and the current work they shared, often spoke about other employees but, with regard to Haase, Koufos was often interested in whether Haase appeared to be under the influence of any drugs. Plaintiff's response to Koufos' frequent inquiry about Haase was consistently that he did not have reason to believe

that she was under the influence of any drugs and that, instead, she seemed to simply have a reckless personality which included recently discussing with Toms River staff, in the presence of Dunnells, certain contents of personnel files of Paterson staff.

111. In the afternoon of February 21, 2016, Koufos sent a text message to Plaintiff; requesting that Plaintiff call him; culminating in Koufos and Plaintiff speaking briefly, Koufos advising that he was going to terminate Haase's employment with NJRC for disclosing contents of personnel files, and instructing Plaintiff to contact Dunnells and inform her that Koufos and he had discussed Haase's conversation.

112. As instructed, Plaintiff contacted Dunnells; sending her a text which stated:

"Sorry to bother you but I need to speak with you for a few min ASAP ... I spoke with John about something and him and I agreed that I need to speak with you ... Just text me when your free for me to call"

113. Around 3:00pm, Haase called Plaintiff and, among other things, advised that her employment with NJRC had just been terminated.

114. At 4:04pm on February 21, 2016, Koufos sent a text message to Plaintiff and wherein he stated: "Thank you for what you did."

115. This situation essentially showed Plaintiff in an extremely uncharacteristic and unflattering light and would

serve to compound the already difficult situation that Plaintiff had been contending with throughout his employment.

116. At 5:59pm on February 21, 2016, Tobin sent a group text; indicating, for the first time, she will be driving herself to the Jersey City office in the morning.

117. At 7:03pm on February 21, 2016, Dunnells sent a group text; stating:

"I am going to bow out of the carpool for the time being given the toms river office is on the horizon and I want to be mindful of boundaries."

118. At 7:14pm on February 21, 2016, Plaintiff sent a group; stating:

"I'll be going to work and doing my job and doing my job with any professional colleagues I have and not letting myself get distracted by a consummate manipulator"

to which Dunnells immediately replied:

"Aye....we all need to sit down tom and I'm sure they'll be tons of questions that I don't have answers to but we all need to debrief the unexpected happenings, process what needs to be processed and find a way to move forward in a way that works best for each of us."

119. On February 23, 2016, the NJRC lease for 310 Main St, Toms River NJ was signed and the Toms River staff no longer had to report to Jersey City.

120. At 7:35am on March 3, 2016, Dunnells sent a text message to Plaintiff; stating:

"Good morning Paul - John Snd Jim asked if you could report to jersey city today, tomorrow and part of next week - where do you want to meet for key exchange"

121. At 7:37am on March 3, 2016, Dunnells sent another text message to Plaintiff; stating:

"You should see the email from John last night about needing the father of reentry for fri and part of next week which I was gonna tell tou this morning but I just got text from him about today."

122. At 7:40am on March 3, 2016, Plaintiff replied to Dunnells messages; referencing a comment Dunnells had made to and about Plaintiff previously by stating:

"What do they need me for? I'm just a case manager and an asshole to boot lol"

to which Dunnells replied:

"Helenas going to be out for a week"

123. On March 3, 2016, Plaintiff reported to Jersey City and was tasked to cover the responsibility of running the remainder of the orientation week and part of the following week with the clients at the Jersey City location for Helena Muhammad who was not a NJRC employee but a JCETP employee; tending to further evidence the "employee/employer relationship" Plaintiff essentially had with not only NJRC but also with JCETP.

124. Also on March 3, 2016, Koufos met with Plaintiff and advised that Plaintiff's work ethic, professionalism, and dedication has been noticed by upper management of both NJRC and JCETP; so Plaintiff was receiving a \$2,500/year (approximately 5%) raise in salary and would begin to see it in his next



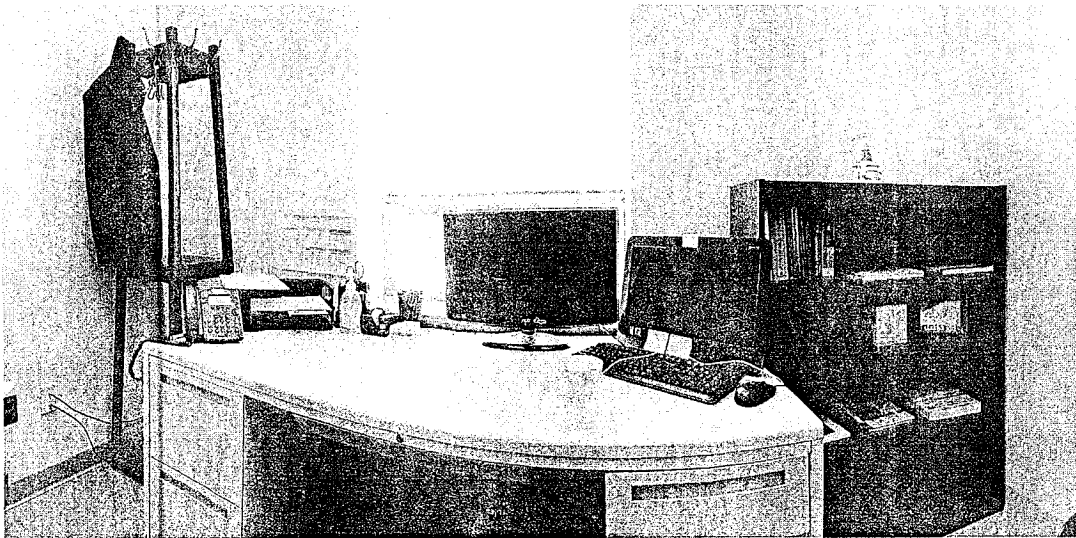
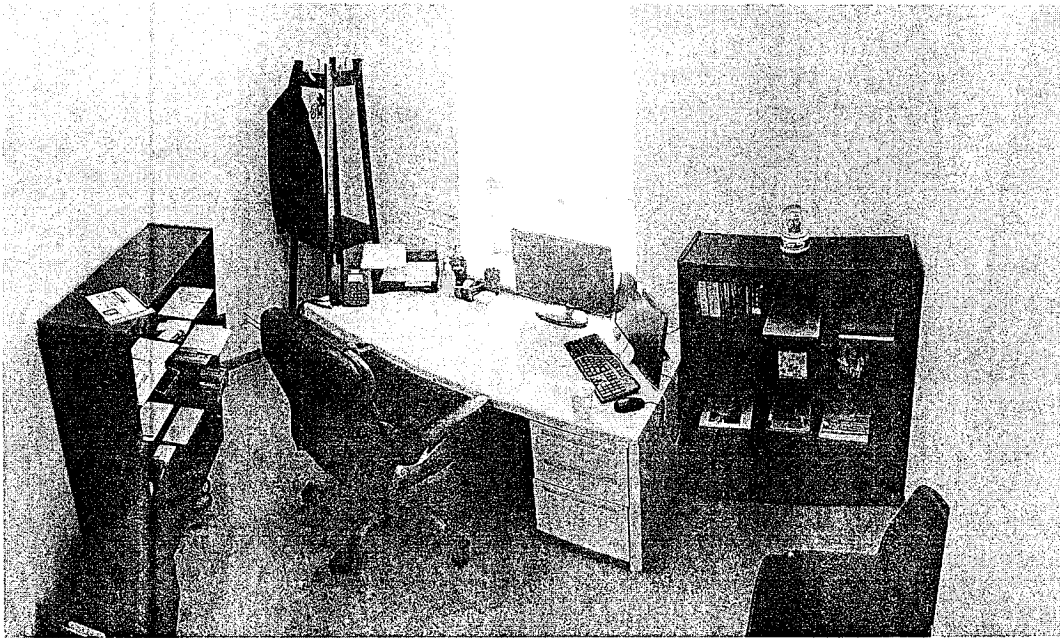
paycheck.

125. On March 8 2020, Koufos sent a text message to Plaintiff whereby he assured Plaintiff that they "have a long career here" at NJRC.

126. On March 21, 2016, Plaintiff was requested by McGreevey and Koufos, through Dunnells, to have as many formerly incarcerated people in attendance at the office the following day and advised that there was a person from the "media" coming to the Toms River office to interview about the Toms River location of NJRC.

127. Also on March 21, 2016 and as Plaintiff was in the process of setting up, and unpacking items, in his office and that he had brought from home, including a computer monitor screen, Dunnells inexplicably walked into his office and simply instructed him that he "didn't need" the second monitor, that Koufos would have a fit, and to take it home.

128. Plaintiff would take the second monitor home at the end of the day, as instructed, but not before finishing setting up his office, with the monitor on his desk, and taking a couple of pictures of it that appear in these images:



129. Later in the day of March 21, 2016, Plaintiff attempted to joke with Dunnells about her telling him to take the monitor home, more to ease his own mind about how arbitrary and irrational she appeared to be about it, by stating that "I am gonna get over it but you totally just pulled rank on me about not letting me have my second monitor." Dunnells then responded that Plaintiff did not need it because he was "not the

media coordinator!" To this, Plaintiff had absolutely no idea what Dunnells was talking about, as he certainly was not the media coordinator, had never had any delusions of being a media coordinator, and did not have any idea what his having a second monitor might have to do with being a media coordinator; assuring Plaintiff that Dunnells was simply trying to find an excuse in her own mind to try to justify what she simply flexed her authority over Plaintiff earlier in the morning. Plaintiff asked Dunnells if she had ever used two monitors and she stated that she has not; so Plaintiff then, jokingly, suggested that the problem is that she does not understand what its like to use two monitors and are just asserting her authority over Plaintiff for the sake of being able to. Even later in the day, Plaintiff joked with Dunnells through a text about letting him have a second monitor as thanks for what he had done earlier in the day and she responded by stating: "When your job changes to data analyst or media coordinator."

130. Aside from the matter of the monitor on March 21, 2016, there was also the instance on the same day of Dunnells coming into Plaintiff's office again, immediately taking up numerous photographs that Plaintiff had not yet put into frames, and proceeding to toss them around and dictate to Plaintiff which ones he can or cannot have in the office. A photo of him holding an alcoholic beverage was arguably the only one that

really made sense to him for why he should not display it in the office and, frankly, he probably was not going to display it anyway but he did not even get to decide that yet. This scene was actually much more disturbing than Dunnells' dictatorship about the monitor, as it was the second time in the day that she had inexplicably come into his office and flexed her authority over him about what he can or cannot have in the office, that it was noticed by at least one of his co-workers, and that he had never seen or heard of her doing anything even remotely close to that to any of his other co-workers.

131. At 9:37pm on March 22, 2016, Dunnells sent Plaintiff a text message; expressing appreciation for his getting formerly incarcerated people at the office earlier in the day.

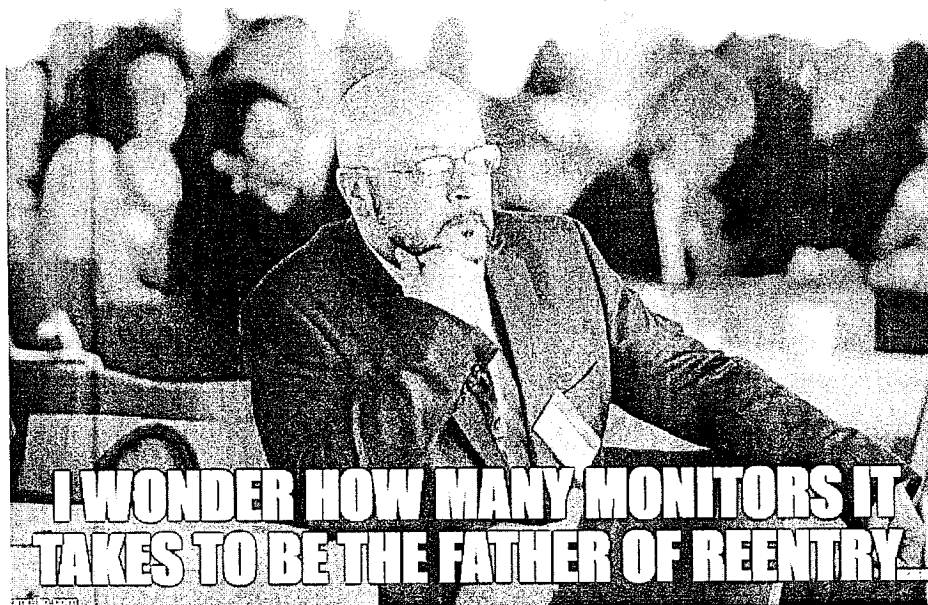
132. On March 24, 2016, JCETP/NJRC hosted an annual reentry conference and which was attended by over a hundred people, many dignitaries, and Plaintiff was tasked to circulate throughout the event and mingle.

133. One of the many people Plaintiff encountered was the Chairman of the NJ State Parole Board who, when informed that I was a Case Manager for the Toms River office, expressed to Plaintiff that he was looking forward to taking a tour of that office. Accordingly, Plaintiff gave the Chairman his business card and immediately proceeded to inform Dunnells.

134. When Plaintiff informed Dunnells of the conversation

referred to in the preceding Paragraph, she immediately scowled and snapped at Plaintiff in front of several other people and including co-workers, superiors, and staff of other locations; stating: "stay in your lane." Plaintiff had no idea what she meant or what he may have done wrong and that response embarrassed him.

135. At 9:34pm on March 24, 2016, Koufos sent a group text to Dunnells, Sangiovanni, Salanitra and Tobin, containing another meme with an image of Plaintiff, and consisting of the following image:



Along with this meme, Koufos stated:

"I suspect the number is one (1). It was great seeing you all Toms River - I'm really confident in you all. Also Paul you worked the room well, just stay away from the Commissioners and Chairmen"

136. Through this, Plaintiff would realize that, although

not happy about the monitor and pictures situation but that he was able and willing to get over it, Dunnells had brought it up at what was the Reentry Conference to Koufos and in the presence of Plaintiff's colleagues in a ridiculing and misleading context; asserting something about Plaintiff wanting to be a "media coordinator" or something other than a Case Manager and otherwise for no reason other than to breed ridicule for him and undermine him among co-workers and superiors (as it clearly did, in fact, and as evidenced by the meme and comments). As well, Plaintiff would also realize that the fact he conversed with the Chairman of the Parole Board was also relayed to Koufos in a context that is unknown but enough to make itself into the group text message.

137. In response to Koufos' group text message, the following exchange occurred:

From Tobin: This is hysterical and totally made my night!! ☐☐

From Plaintiff: As always, it's my pleasure to be Johns whipping pole and take the hits for our team ☐ ☐☐☐

From Koufos: Lol!!!!

From Koufos: <http://www.fios1news.com/newjersey/jersey-city-prison-reentry-conference#.VvSjc2H3an0>

Note Paul milling around trying to get on TV ☐☐

From Tobin: ☐

From Salanitra: Haha

From Dunnells: classic

From Plaintiff: Lol ... Not at all trying to get on tv but definitely "milling around" as we all were suppose to be doing ... So yes, indeed, "classic" (e.g. Paul doing the outreach work)

From Salanitro And this is why I am not friends with u on Facebook little digs

From Plaintiff: You're right, [Salanitro] ... "I'm" not allowed to do any digs ... Everyone else is though, at "my" expense ... God forbid if I said that to you or anyone else; Lindsay would quickly jump down my throat again to declare firmly how it's not my place to be even well-intended but constructively critical, as you were just now to me, and remind me that it's her place ... And of course no one is quickly or otherwise gonna be jumping down your throat ...

From Plaintiff: It's all funny and hahaha until Paul points out FACTS

From Dunnells: And this turned south quick - we will address this like professionals on Monday - not at 10:52pm"

138. Plaintiff evidently had become increasingly frustrated, depressed, anxious and intolerant about the discriminatory and hostile work environment he was being subjected to and, particularly as nothing of the sort of treatment he was being subjected to appeared at all to be imposed on the female employees, on the basis of his being a male.

139. At 2:02am on March 28, 2016, Plaintiff sent an email to Dunnells, with copy to Koufos, McGreevey, O'Malley, Cali and perhaps others and with regard to his ever increasing concern

about the way she, as his supervisor, had been treating him and, more specifically, referring to her treating him "in a manner that is demeaning, undermining, otherwise simply disrespectful and absolutely unequal to how you treat my co-workers who are all female. \* \* \* " Therein, Plaintiff also stated:

"I do not know, with any certainty at least, why you treat me the way you do but I have had to contemplate what the reason(s) may be. Considering all things and specifically including words from your own mouth on numerous occasions, I am concerned that a predominant factor may very well be the simple fact that I am a man and whom you have an authority position over. Some of the things I am relying on is your numerous uses of the word 'menace' in reference to what you think you could do to several men (i.e. Mike Lacy and at least 2 clients) and also your detailed description just over a week ago of how you would like to take a stiletto shoe heel and use it to burst your husband's scrotum. This, of course, follows when you told me in [January] about how the hostile antics of one of our former colleagues ([Haase]) that day was due to her having her menstrual cycle ('period') and that, as I am 'the only male in the office,' I will "have to learn to just deal with it (the women in the office being hostile toward me when they are on their period).'

"Not looking forward to speaking with you or anyone about this but, apparently, it is necessary. It is also my sincere hope that, somehow, this can finally be addressed and resolved."

140. At approximately 2:15pm, Dunnells and Plaintiff had a meeting with each other, during which Plaintiff had recorded the audio of, and ostensibly in reference to the email he sent to her at 2:02am. This meeting was approximately an hour long and, without it devolving into screaming and cursing, it occasionally became loud, argumentative, and unproductive. However, it was



during this meeting that Dunnells at least acknowledged having made the comments about being able to "menace" several men and about wanting to take a stiletto heel and using it to rupture her husband's scrotum; saying she "was joking."

141. Shortly after the conclusion of the meeting and being at approximately 3:30pm, Dunnells convened a "team meeting" among herself, Plaintiff, Tobin and Salanitra, during which Plaintiff had recorded the audio of, and the entire meeting was nothing more than an opportunity Dunnells orchestrated for the co-workers females, including Dunnells, to attack Plaintiff.

142. When Plaintiff left the office on March 28, 2016, he called and spoke with Koufos about the so-called meetings and agreed to continue to speak about it again.

143. At approximately 10:13pm on March 28, 2016, Koufos and Plaintiff had a telephone call with each other, during which Plaintiff recorded the audio of, and the discussion related to the email Plaintiff sent to Dunnells at 2:02am, copied to Koufos and others, and with regard to Plaintiff's ongoing concerns about being subjected to a discrimination and harassment. Therein, Koufos at least acknowledged that, with regard to the ever-present situation,

"[i]n a situation like that, you put me in a rough spot, especially because you sent it to Katie [O'Malley]. So you put me in a real rough spot because here now I'm put on notice of something. So ... the right thing to do would've been to call you both in.

As well, Koufos further stated: "Ya know what, like, if you don't like that stuff, don't work there." Additionally, Koufos even further stated:

"When that kind of stuff happens, ya know especially when you send it to Katie, you know who's the fucking lawyer in the agency. Then we gotta make a ruling and I'm like relax."

144. At approximately 8:00am on March 29, 2016, Koufos called Plaintiff and Plaintiff began to record the audio of the conversation. At the outset, Koufos advised Plaintiff that he wanted to give him a heads up and warning regarding interactions with Dunnells in light of some recent developments that made Dunnells' invaluable. The audio-recorded colloquy is as follows:

KOUFOS: Ahhh ... understand, if that kicks off, like Lindsay's power in the agency goes much higher than it is now. *She becomes more than the chick in Toms River.*

PLAINTIFF: Uh hm ...

KOUFOS: So I just want you to know that ahead of time, ya know, and to *make your decisions accordingly.*

PLAINTIFF: Gotcha

KOUFOS: Because ... if if ... *she's not going anywhere anyway now, right.* But if she gets imbedded in a program like this [inaudible] ... with a direct report to me, into the Governor's office, *I mean you know that means right!?*

PLAINTIFF: [LAUGHTER] Yeah

KOUFOS: So ... use your head.

PLAINTIFF: I got you.

KOUFOS: And don't ever for ... don't ever think that you're not valued because someone doesn't give you a monitor ... you're not valued because *someone wants to boot their husband in the balls or whatever*. But you're valuable to all of us. And you're gonna remain valuable and you're not going anywhere. You're not getting fired. You're not quitting. Ya know what I mean. *You're not gonna sue*. You're not gonna do any of those things. We are gonna make it work and you're gonna make that place rock. The same way Helena Muhammad made our place rock when it started before I even got there.

PLAINTIFF: Okay.

KOUFOS: Ya know what I mean.

PLAINTIFF: I got you.

KOUFOS: That's that's where, that's ya know, our vision for you. Alright. And keep moving you up. And then I like the idea of, you know, you take control of, you know, sort of, whats going on, Toms River goes well, and you know we send you to the other sites to train Case Managers. I like that idea.

PLAINTIFF: Cool.

KOUFOS: I do. I do. Because yea, we'll get the professor [inaudible] to do the MIs and get the Lindsays and the Shaes psycho-babble. Right!? But at the end of the day, someone's gotta say how do you talk to a guy whose got neither a pot to piss in nor a window to throw it out of. Right!?

PLAINTIFF: Yeah.

KOUFOS: Who's been to prison. Only. Paul knows how to talk to that guy.

PLAINTIFF: Right.

KOUFOS: So yeah. Everything is gonna be fine. I just wanted to give you the head. Now.

PLAINTIFF: Awesome. Congratulations, by the way.

KOUFOS: Well. Not done yet. But we made a major major hurdle ... ah ... you know ... in it ... because I've been beating this to death ... ah ... as you know ...

PLAINTIFF: Right.

KOUFOS: So ... and that's the thing, people just wanna stop hearing me nag and complain and their like alright, alright, what do you need ... a million ... here ... leave us alone ... [laughter]

PLAINTIFF: [laughter]

KOUFOS: Leave us the fuck alone. We'll give 1 6 if you never call again. Alright. Alright.

PLAINTIFF: [laughter]

KOUFOS: [laughter] Hey. That's how I get most of my dates. Ya know what I mean. That's all I hear anymore.

PLAINTIFF: You and me both, until Jackie finally gave in. She's like, alright. Geezus.

KOUFOS: [laughter] I know. I gotta find my. I gotta find my. *I gotta see if I can work on Marie to cave in and then I am gonna retire, hanging up the jersey brother.*

PLAINTIFF: Nice.

KOUFOS: *And that's it. And you'll be at my fucking wedding and, if I give any speeches, I'll probably still be talking trash about you. [laughter]*

PLAINTIFF: [laughter] Of course.

KOUFOS: Listen. We're gonna be okay.

PLAINTIFF: Alright.

KOUFOS: And you know what. We're. You're a part of that team and I'm not saying this just cause you're on the phone and not trying to give you a pep talk before a big game. Right. Its important ... I'm gonna tell you a

fast personal story. So, you know, over the past, really since November on, its been constantly stress just in this job for me, its killing me. I mean it really is. Ah because its not a hard job, related to running a law firm or trying cases, but its just so many political moving parts and its all bullshit and egos, whatever, so ... it was getting to me, Paul. It really was. Even as we were starting to get the sites up, like I wasn't, you know, it wasn't in the right, mental frame of mind, [inaudible] mental frame of mind, and ah, ya know, it wasn't really until, you know, and while Ocean County may be sort of a, you know, their the little kids table in the reentry game, you know, at the same time, like we actually for the first time down there, as an agency, just in general, [inaudible] people being down there, we have a blank slate. We have a blank slate to do reentry.

PLAINTIFF: Right.

KOUFOS: Right cause I told them the reason no one is talking to us is because no one really believed that we were doing it I don't think. No matter how many times we went down there, they were like nah he aint coming. Because remember I made them think we couldn't do it without a county buy in, meaning money.

PLAINTIFF: Right.

KOUFOS: I did that purposely.

PLAINTIFF: Right.

KOUFOS: Because then, then when they say we don't have any money, I be like okay I have some funding, can we get the funding from you. So its like trying to Jew them out of some money.

PLAINTIFF: Right.

KOUFOS: Uhm ... and then ultimately they're like we don't have shit for you. I guess ... [inaudible] ... do you. And then I went and funded it self-funded, for you know. So we have a blank slate. We gotta paint this picture. We gotta paint this canvas. So so do what you gotta do to make peace with her. Uhm ... I talk to ... I'm gonna call her and just give her a heads up on some more operational details after this. I am gonna let her

know we talked, because she is never gonna believe that we didn't.

PLAINTIFF: Right.

KOUFOS: You know and all I'm gonna say is as far I can tell everything is cool and ah you know everything will be fine going forward.

PLAINTIFF: Okay.

KOUFOS: I could represent that; right.

PLAINTIFF: Sure. Sounds about right.

KOUFOS: I know I could say whatever I want.  
[laughter]

PLAINTIFF: [laughter]

KOUFOS: That's like those guys in prison. Yeah, you know. Fucking Knowledge is kicking all that ass. Just ask him, he'll tell you.

PLAINTIFF: Pretty much. Alright. Let me finish up here. I'm trying to get into the office by 8:30. I like to get in there by 8:30. Cause the overachiever I am likes to get in there a half hour early.

KOUFOS: Stop fucking with the bullshit. Alright.

PLAINTIFF: I know.

KOUFOS: Listen, six months from now we're gonna be laughing our asses off alright!?

PLAINTIFF: At my expense, of course, yes.

KOUFOS: Well, you know, hopefully at all of our expenses.

PLAINTIFF: Alright brother.

KOUFOS: Alright brother. One last thing. You are valuable. You're not getting fired. You're not getting suspended. Get that out of your mind.

PLAINTIFF: Alright brother.

KOUFOS: You're a part of this team and a key part of this team.

PLAINTIFF: I appreciate that.

KOUFOS: You're not a bench warmer; you're a starter.

PLAINTIFF: Alright. Thank you.

KOUFOS: And I want that in your head. Alright bro. Talk to you later.

PLAINTIFF: Alright. Bye bye. Its 8:15am, March 29, 2016.

(emphasis added)

145. During the aforesaid conversation, particularly where Koufos stated that "I gotta see if I can work on Marie to cave in and then I am gonna retire, hanging up the jersey brother[,]"" Plaintiff understood that Koufos was referring to Marie Pryor, a JCEPT/NJRC subordinate of Koufos and McGreevey, and who was one of several subordinate employees whom Koufos had been having sexual, and otherwise pursuing intimate, relationships with.

146. Interestingly, Koufos and Marie Pryor subsequently became engaged and married.

147. On April 7, 2016, McGreevey appears to have sent an email to Plaintiff. This was perhaps the first email Plaintiff ever received from McGreevey and wherein he advised that, for what appears to be some cryptic reasoning, he had recommended that Plaintiff be suspended for a day without pay.

148. Whatever the reason was for McGreevey to send such email and to make such recommendation, there was no discussion with Plaintiff about it, no notice to Plaintiff that there was even any matter where Plaintiff's conduct was being considered, or any indication for why McGreevey, who was the Executive Director of JCETP and Chairman of the NJRC Board of Trustees, was involved and making employee discipline decisions.

149. At 3:42pm on April 7, 2016, Plaintiff sent an email to McGreevey, copied to Koufos and Dunnells, and therein expressed concerns about the email he received from McGreevey; including the fact that there was still no employee handbook that describes whatever may be NJRC policies and procedures.

150. Due to McGreevey's recommendation, Plaintiff was advised that he was suspended without pay for the day of April 8, 2016.

151. On April 11, 2016, Plaintiff sent another email to McGreevey and copied Koufos and Dunnells; following up to the April 7, 2016 email Plaintiff sent to him and had not yet received any response and further expressing concerns about his ability to work for the NJRC.

152. On April 12, 2016, Plaintiff sent another email to Dunnells, copied to McGreevey and Koufos, and therein expressed his ongoing concerns about the treatment he was receiving and the environment he was working in; particularly stating:



"Bottom line, as far as I am concerned at this point, is that I'm not going to simply quit but I also am not going to simply allow you or anyone to continue to disrespect me, undermine me, harass me or otherwise interfere with me doing the work of Reentry that I have been and continue to be so passionate about, unless I am terminated from employment with NJRC; not without me addressing it at least as I have been through verbal words and writing or any other means that I deem appropriate, including talking about it publicly or otherwise outside of NJRC ... You, John, Jim and others of NJRC certainly are my superiors in NJRC but none of you have any right to treat me, as a person, the way I have been treated. You, John, and Jim can continue to ignore my emails and text messages but it doesn't change anything and ignoring me does not address or, more importantly, resolve the issues that certainly have been existing.

153. Also on April 12, 2016, another co-worker, Salanitra, quietly advised Plaintiff that she saw the poster of a political candidate hanging in the office of Sangiovanni and Tobin, on the back of the door, and this prompted Plaintiff, wanting to see it for himself, to go into the office of Sangiovanni and Tobin; seeing the poster and taking a picture of it as it was hanging on the back of the door.

154. Plaintiff was advised to report to the Jersey City office on April 14, 2016 for a meeting and was not apprised of with whom the meeting was with or what its purpose was. Accordingly, he reported to the Jersey City office and where he then met with McGreevey, Koufos, and Muhammad and recorded the audio of the conversation which was approximately an hour and a half long.

155. From the outset of the meeting, McGreevey spent the first approximately six minutes talking and pontificating about various things, eluding to things that made no sense to Plaintiff; accusing Plaintiff of things that were variously either not true, inaccurately described, and the first time Plaintiff was hearing of it; and eventually expressing that he would like for Plaintiff to remove himself from the Toms River office and work in the Jersey City office and that Plaintiff's employment would be terminated; rendering Plaintiff largely confused and concerned about how McGreevey had come to all the conclusions he had, having never discussed any of it with Plaintiff, and not appearing interested in discussing any of it with Plaintiff even then.

156. One of the things McGreevey mentioned, and mentioned it with particular emphasis, was that Plaintiff "raised his voice in the presence of women" in the Toms River office and that the women in the Toms River office were "afraid" of Plaintiff, as if McGreevey was compensating for some personal deficiency in regard for concern for women at the expense of Plaintiff.

157. After the first approximately six minutes of McGreevey talking, Plaintiff succinctly rejected McGreevey's interest in Plaintiff working in the Jersey City office; believing that, under the circumstances, it would be acquiescing to an adverse

working condition and particularly one that he did not deserve and that was in retaliation for his complaints about, and refusal to tolerate, the discrimination and harassment he was being subjected to on the basis of his being a male.

158. Throughout the remainder of the nearly one and a half hour meeting, McGreevey, Koufos, and Muhammad proceeded to attempt to convince Plaintiff to simply acquiesce and there was no interest on their part to discuss any of the things that formed the basis for their position about Plaintiff leaving the Toms River office.

159. Inexplicably and bizarrely, the near end of the meeting included McGreevey having Plaintiff watch a nearly six minute video on youtube, called "Jesus Christ Superstar (1973) I only want to say - Gethsemane," and it was on par with other attempts by McGreevey to use and manipulate religion and spiritual beliefs to persuade Plaintiff into agreeing with and accepting what *McGreevey* wanted.

160. McGreevey directed Plaintiff to think about it over the weekend and come back on the following Monday, April 18, 2016.

161. On April 15, 2016, Plaintiff and Dunnells had another a conversation which he also recorded the audio of and wherein he brought up, as an example of the disparate treatment she engaged in toward Plaintiff, the subject of the poster Dunnells

had explicitly told Sangiovanni and Tobin they could not hang in their office. In pertinent part, the following colloquy occurred:

Plaintiff: "We had a conversation about a poster ... "

Dunnells: "Its on the back of the door."

Plaintiff: "Right. And now you know its been on the back of the door and its still there."

Dunnells: [inaudible]

Plaintiff: "A client is in that room and the door shuts whats there."

Dunnells: "Well then the door shuts ... But this is going back to the tit for tat."

Plaintiff: "The point is that that's a poster of Donald Trump, on the back of that door."

Dunnells: "Okay."

Plaintiff: "Make America Great Again."

Dunnells: "Okay."

Plaintiff: "In an office that they sharing that, according to you, you told me you told them they can't have it."

Dunnells: "And when I noticed it ... "

Plaintiff: "And its there and you know its there and its still there."

Dunnells: "Because its behind the door, at this point and the door is open when a client is ... well now its been closed which is a different situation ... But if the door is open and a client ... no one sees it. It took me a while ... "

Plaintiff: "But if there is a client in that office and they close that door, while the client is in there ...

Dunnells: "And that is something that when I brought that up, it was that the door stays open for an Employment Specialist."

Plaintiff: "So you're ... there's an exception that you made for them after you told them not to have it there."

Dunnells: "I didn't make an exception."

Plaintiff: "But its on that door."

Dunnells: "And I just recently figured it out that it was."

Plaintiff: "Okay. And so that ... it speaks volumes."

Dunnells: "It doesn't speak any volumes."

Plaintiff: "It ... to me it does. To me it does. Because of how ... "

Dunnells: " ... whatever purposes you [inaudible] ..."

Plaintiff: "Well that is one way of looking at it but the reality is is that a whole lot was made out about that monitor and my, it wasn't

Dunnells: "Not a whole lot was made out about that monitor; I said no two monitors and you made a whole lot about it ... "

Plaintiff: "Because I could not understand the rationale for it other than simply you wanted it and legitimately you don't have to explain yourself to me ...

Dunnells: "Exactly."

Plaintiff: "Fine; you don't. But ... a separate monitor that I was going to use for legitimate work purposes, you would ... there was ... you didn't want to consider it, there was no ... you know, alternatives; it was that was that; you didn't wanna talk about it."

Dunnells: "I just said no."

Plaintiff: "But you tell them no to a poster ... "

Dunnells: "... necessary and it continued to grow further and further and further ... "

Plaintiff: "No. Its not."

Dunnells: "It has."

Plaintiff: "Its the idea. Its not about ... no, its not necessarily about the monitor. It was about the idea about why not."

Dunnells: "... hard feelings about it."

Plaintiff: "No. The hard feelings are only because I couldn't understand why. No and you don't have to."

Dunnells: "I don't have to explain ..."

Plaintiff: "No and you don't have ... no; again, you don't have to give me the explanation ..."

Dunnells: "I don't have to give you an explanation for why."

Plaintiff: "Right ... But they have that damn poster on the back of their win ... on the back of their door there and, according to you, its not suppose to be there."

Dunnells: "Its not suppose to be in the ... whats in there now ... cause that's exactly where it was gonna go initially ..."

Plaintiff: "mmhmm"

Dunnells: "The fact that its behind the door, it stays open when a clients in there, that no one ever sees, unless you're in there with the door closed, which they haven't been in there with the door closed"

Sangiovanni: "That was taken down awhile ago and it was on the back of the door for a couple days. The only way you would've known that is if you came into my office while we weren't here."

Plaintiff: "Its been off for a couple of days. Is that what you're saying!? How about just yesterday."

Plaintiff: "So ...

162. In short, Dunnells particularly volunteered knowing that, despite telling Sangiovanni and Tobin that they cannot have such a poster in the office at all, it was hanging in their office and this, given Dunnells inexplicable stance about what Plaintiff can/cannot have in his office and that became the brunt of purported jokes which were actually additional tools that were used to degrade, humiliate, antagonize, and undermine Plaintiff, exemplified Dunnells' disparate treatment between Plaintiff and his female co-workers.

163. On April 18, 2016, Plaintiff reported to the Jersey City office to meet with McGreevey and, there, advised that he was not agreeing to leaving the Toms River office.

164. On April 19, 2016, McGreevey sent to Plaintiff an email, using a JCETP email address, and therein advised that "due to budgetary and case load considerations," April 19, 2016 was Plaintiff's last day of employment with NJRC.

165. Throughout Plaintiff's employment with NJRC, NJRC and JCETP were separate corporate, 501(c)(3) nonprofit, entities yet they were operated and functioned in such a manner that they created and maintained a cognizable employee/employer relationship not only between NJRC and Plaintiff but also between JCETP and Plaintiff.

166. Also throughout Plaintiff's employment with NJRC, he was eager and enthusiastic to assist formerly incarcerated and court-involved men and women, competently and diligently performed every task assigned to him, and both dedicated and loyal to NJRC and to the clients and public whom NJRC was to serve.

167. Also throughout Plaintiff's employment with NJRC, neither he nor, to his knowledge, his colleagues were ever provided with an established employee handbook for either NJRC or JCETP or other written policies and procedures of NJRC or JCETP and everyone largely, for lack of a better phrase, operated and flew by the seat of their pants on nearly all matter but, particularly, including complaints, investigations, and resolutions regarding discrimination and harassment.

168. Despite Plaintiff's known, demonstrated, and recognized ability and willingness to significantly and meaningfully contribute to NJRC, he was terminated from his employment with NJRC, when he refused to accept an adverse change in his work conditions and which was specifically to transfer from working in the Toms River office to the Jersey City office in reprisal to his complaints and his increasing intolerance for the hostile work environment he was being subjected to.

169. The decision to terminate Plaintiff's employment was



motivated by and/or determined by Plaintiff being a male and/or was causally connected to Plaintiff's objections to the hostile work environment he was being subjected to.

170. The stated reason and any other reason that may be offered as justification for Plaintiff's employment being terminated is patently pretext.

## V. LEGAL CLAIMS

### COUNT ONE

#### **DISCRIMINATION, HARASSMENT, RETALIATION, AIDING (NJRC AND JCETP)**

180. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

181. The Law Against Discrimination (hereinafter referred to as the "LAD") prohibits an employer, because of the sex of any individual, to discriminate against such individual in terms, conditions or privileges of employment.

182. The LAD prohibits any person to take reprisals against any person because that person has opposed any practices or acts forbidden under the LAD.

183. THE LAD prohibits any person, whether an employer or an employee or not, to aid, abet, incite, compel or coerce the doing of any of the acts forbidden under this act, or to attempt to do so.

184. Plaintiff was employed by New Jersey Reentry

Corporation (hereinafter referred to as "NJRC") during the period of times relevant hereto.

185. Throughout Plaintiff's employment with NJRC and due to the manner in which NJRC and Jersey City Employment and Training Program (hereinafter referred to as "JCETP") were created and maintained, there was a cognizable employer/employee relationship not only between NJRC and Plaintiff but also between JCETP and Plaintiff. In fact and at all times relevant hereto, both NJRC and JCETP directly controlled or exerted control over Plaintiff, including but not limited to control over operations, hiring, promotion, demotion, firing and/or evaluation of NJRC/JCETP personnel.

186. The pattern and practice of discrimination, harassment, and retaliation directed at Plaintiff by employees of NJRC/JCETP is outlined above.

187. Plaintiff was subjected to repeated, pervasive, severe, and continuing instances of disparate treatment and harassment by NJRC/JCETP because of his sex, male, as set forth above.

188. NJRC/JCETP regularly targeted, discriminated and retaliated against Plaintiff because of his sex, male, as set forth above.

189. The above-described conduct would not have occurred but for Plaintiff being of the male sex.

190. The above-described harassing and discriminatory conduct was severe and pervasive enough to make a reasonable person believe that the conditions of employment were altered, and the working environment was hostile and discriminatory.

191. Plaintiff specifically complained to Defendants concerning the discrimination and harassment he was being subjected to, as set forth above at length, because of his sex, male, as set forth above, that none of his co-workers who were all female were subjected to, and that would not have occurred but for the fact that he is a male.

192. Plaintiff's conduct in this regard was protected under the LAD.

193. Defendants took adverse employment actions against Plaintiff in retaliation for Plaintiff engaging in the aforementioned protected conduct.

194. Plaintiff specifically refused to accept Defendant's ultimatum to accept an adverse working condition or have his employment terminated.

195. Plaintiff's conduct in this regard was protected under the LAD.

196. Defendants took adverse employment actions against Plaintiff, in retaliation for Plaintiff engaging in the aforementioned protected activity.

197. NJRC/JCETP did not conduct an adequate investigation

and failed to take proper remedial action to protect Plaintiff from discriminatory behavior and retaliation.

198. NJRC/JCETP did not have an effective anti-harassment policy in place, NJRC/JCETP have not maintained an anti-harassment policy that is current and effective, and any anti-harassment policy there may be claimed to exist existed in name only.

199. NJRC/JCETP did not maintain useful formal and informal complaint structures for victims of discrimination, harassment, and retaliation.

200. NJRC/JCETP did not properly train its supervisors and/or employees on the subject of discrimination, harassment, and retaliation.

201. NJRC/JCETP failed to institute appropriate monitoring mechanisms to check the effectiveness of any anti-harassment policies and complaint structures.

202. NJRC/JCETP did not have commitment from the highest levels of management that harassment will not be tolerated; in fact, the highest levels of management deliberately and actively discriminated on the basis of sex and retaliated against Plaintiff who complained about such conduct.

203. NJRC/JCETP failed to conduct prompt and thorough investigations of Plaintiff's complaints of harassment or provide a remedial plan reasonably calculated to stop any

harassment that is found.

204. As the employer and/or supervisor of Plaintiff, NJRC/JCETP are vicariously, strictly, and/or directly liable to Plaintiff pursuant to the LAD, in that the affirmative acts of harassment, discrimination, and retaliation committed by its Chairman of its Board of Trustees, Executive Director, Deputy Director and Facility Director, namely McGreevey, Koufos, and Dunnells, and occurred within the scope of their employment; the creation of the hostile work environment was aided by NJRC/JCETP in delegating power to McGreevey, Koufos, and Dunnells, to control the day-to-day working environment; and/or NJRC/JCETP were deliberately indifferent, reckless, negligent and/or tacitly approved the discrimination, hostile work environment, and/or retaliation; and/or NJRC/JCETP and McGreevey, Koufos, and Dunnells, failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training, and/or monitoring mechanisms for same, despite the foreseeability of harassment, discrimination, and retaliation in the workplace; and/or by having actual knowledge of the harassment, discrimination, and retaliation of Plaintiff and failing to promptly and effectively act to stop it.

205. NJRC/JCETP aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or

coerce McGreevey, Koufos, and Dunnells, to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering all Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e)

206. McGreevey, Koufos, and Dunnells, all as superiors of Plaintiff, aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce each other to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering NJRC/JCETP individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e)

207. The acts and/or omissions of NJRC/JCETP were the cause of Plaintiff's harm, and the acts and/or omissions of NJRC/JCETP were actuated by actual malice or accompanied by a wanton and willful disregard of person who foreseeably might be harmed by those acts or omissions.

208. In retaliation for Plaintiff engaging in the aforementioned protected activity, Defendants terminated Plaintiff's employment.

209. As a direct and proximate result of Defendants conduct, Plaintiff has suffered emotional distress, compensatory and other damages.

COUNT TWO

**DISCRIMINATION, HARASSMENT, RETALIATION, AIDING  
(MCGREEVEY)**

210. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

211. McGreevey, as Executive Director of JCETP and Chairman of the NJRC Board of Trustees, is a person liable under the LAD for discrimination against Plaintiff in terms, conditions or privileges of employment because of the sex of Plaintiff.

212. McGreevey, as Executive Director of JCETP and Chairman of the NJRC Board of Trustees, is a person liable under the LAD for taking reprisal against Plaintiff because he opposed discriminatory conduct.

213. McGreevey, as Executive Director of JCETP and Chairman of the NJRC Board of Trustees, is a person liable under the LAD for aiding and abetting the discrimination and retaliation against Plaintiff.

214. The pattern and practice of discrimination, harassment, and retaliation directed at Plaintiff by employees, including McGreevey, of NJRC/JCETP is outlined above.

215. Plaintiff was subjected to repeated, pervasive, severe, and continuing instances of disparate treatment and harassment by McGreevey because of Plaintiff's sex, male, as set forth above.

216. McGreevey regularly targeted, discriminated and retaliated against Plaintiff because of his sex, male, as set forth above.

217. The above-described conduct would not have occurred but for Plaintiff being of the male sex.

218. The above-described harassing and discriminatory conduct was severe and pervasive enough to make a reasonable person believe that the conditions of employment were altered, and the working environment was hostile and discriminatory.

219. Plaintiff specifically complained to McGreevey concerning the discrimination and harassment he was being subjected to, as set forth above at length, because of his sex, male, as set forth above, that none of his co-workers who were all female were subjected to, and that would not have occurred but for the fact that he is a male.

220. Plaintiff's conduct in this regard was protected under the LAD.

221. McGreevey took adverse employment actions against Plaintiff in retaliation for Plaintiff engaging in the aforementioned protected conduct.



222. Plaintiff specifically refused to accept McGreevey's ultimatum to accept an adverse working condition or have his employment terminated.

223. Plaintiff's conduct in this regard was protected under the LAD.

224. McGreevey took adverse employment actions against Plaintiff, in retaliation for Plaintiff engaging in the aforementioned protected activity.

225. McGreevey did not have an effective anti-harassment policy in place, McGreevey did not maintained an anti-harassment policy that is current and effective, and any anti-harassment policy there may be claimed to exist existed in name only.

226. McGreevey did not maintain useful formal and informal complaint structures for victims of discrimination, harassment, and retaliation.

227. McGreevey did not properly train his supervisors and/or employees on the subject of discrimination, harassment, and retaliation.

228. McGreevey failed to institute appropriate monitoring mechanisms to check the effectiveness of any anti-harassment policies and complaint structures.

229. McGreevey did not have commitment from the highest levels of management that harassment will not be tolerated; in fact, the highest levels of management deliberately and actively

discriminated on the basis of sex and retaliated against Plaintiff who complained about such conduct.

230. McGreevey failed to conduct prompt and thorough investigations of Plaintiff's complaints of harassment or provide a remedial plan reasonably calculated to stop any harassment that is found.

231. As the employer and/or supervisor of Plaintiff, McGreevey is vicariously, strictly, and/or directly liable to Plaintiff pursuant to the LAD, in that the affirmative acts of harassment, discrimination, and retaliation committed by himself, his Executive Director, his Deputy Director and his Facility Director, namely Koufos and Dunnells, and occurred within the scope of their employment; the creation of the hostile work environment was aided by McGreevey in delegating power to Koufos and Dunnells, to control the day-to-day working environment; and/or McGreevey was deliberately indifferent, reckless, negligent and/or tacitly approved the discrimination, hostile work environment, and/or retaliation; and/or McGreevey failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training, and/or monitoring mechanisms for same, despite the foreseeability of harassment, discrimination, and retaliation in the workplace; and/or by having actual knowledge of the harassment, discrimination, and retaliation of

Plaintiff and failing to promptly and effectively act to stop it.

232. McGreevey aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce Koufos and Dunnells, to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering all Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e)

233. McGreevey, Koufos, and Dunnells, all as superiors of Plaintiff, aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce each other to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering himself and all defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e)

234. The acts and/or omissions of McGreevey were the cause of Plaintiff's harm, and the acts and/or omissions of McGreevey were actuated by actual malice or accompanied by a wanton and

willful disregard of person who foreseeably might be harmed by those acts or omissions.

235. Plaintiff's employment was subsequently terminated by Defendants.

236. The decision to terminate Plaintiff's employment was causally connected and/or motivated in part and/or determined in part by Plaintiff's protect conduct.

237. McGreevey participated in the decision to terminate Plaintiff's employment and/or provided assistance to NJRC/JCETP in discriminatorily and/or retaliatory terminating Plaintiff's employment.

238. In this regard, McGreevey was generally aware of his role in the overall illegal, discriminatory and retaliatory activity at the time that he provided the assistance.

239. In retaliation for Plaintiff engaging in the aforementioned protected activity, McGreevey terminated Plaintiff's employment.

240. As a direct and proximate result of McGreevey conduct, Plaintiff has suffered emotional distress, compensatory and other damages.

241. Because the unlawful discrimination and/or termination was undertaken by members of upper management, including McGreevey, and was undertaken intentionally, egregiously, maliciously and with a willful or wanton disregard for the

rights of Plaintiff, punitive damages are appropriate.

COUNT THREE

**DISCRIMINATION, HARASSMENT, RETALIATION, AIDING  
(KOUFOS)**

242. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

243. Koufos, as Deputy Director of JCETP and Executive Director of NJRC, is a person liable under the LAD for discrimination against Plaintiff in terms, conditions or privileges of employment because of the sex of Plaintiff.

244. Koufos, as Deputy Director of JCETP and Executive Director of NJRC, is a person liable under the LAD for taking reprisal against Plaintiff because he opposed discriminatory conduct.

245. Koufos, as Deputy Director of JCETP and Executive Director of NJRC, is a person liable under the LAD for aiding and abetting the discrimination and retaliation against Plaintiff.

246. The pattern and practice of discrimination, harassment, and retaliation directed at Plaintiff by employees, including Koufos, of NJRC/JCETP is outlined above.

247. Plaintiff was subjected to repeated, pervasive, severe, and continuing instances of disparate treatment and

harassment by Koufos because of Plaintiff's sex, male, as set forth above.

248. Koufos regularly targeted, discriminated and retaliated against Plaintiff because of his sex, male, as set forth above.

249. The above-described conduct would not have occurred but for Plaintiff being of the male sex.

250. The above-described harassing and discriminatory conduct was severe and pervasive enough to make a reasonable person believe that the conditions of employment were altered, and the working environment was hostile and discriminatory.

251. Plaintiff specifically complained to Koufos concerning the discrimination and harassment he was being subjected to, as set forth above at length, because of his sex, male, as set forth above, that none of his co-workers who were all female were subjected to, and that would not have occurred but for the fact that he is a male.

252. Plaintiff's conduct in this regard was protected under the LAD.

253. Koufos took adverse employment actions against Plaintiff in retaliation for Plaintiff engaging in the aforementioned protected conduct.

254. Plaintiff specifically refused to accept McGreevey's ultimatum to accept an adverse working condition or have his

employment terminated.

255. Plaintiff's conduct in this regard was protected under the LAD.

256. Koufos took adverse employment actions against Plaintiff, in retaliation for Plaintiff engaging in the aforementioned protected activity.

257. Koufos failed to conduct prompt and thorough investigations of Plaintiff's complaints of harassment or provide a remedial plan reasonably calculated to stop any harassment that is found.

258. Koufos did not have an effective anti-harassment policy in place, McGreevey did not maintained an anti-harassment policy that is current and effective, and any anti-harassment policy there may be claimed to exist existed in name only.

259. Koufos did not maintain useful formal and informal complaint structures for victims of discrimination, harassment, and retaliation.

260. Koufos did not properly train his supervisors and/or employees on the subject of discrimination, harassment, and retaliation.

261. Koufos failed to institute appropriate monitoring mechanisms to check the effectiveness of any anti-harassment policies and complaint structures.

262. Koufos did not have commitment from the highest levels

of management that harassment will not be tolerated; in fact, the highest levels of management deliberately and actively discriminated on the basis of sex and retaliated against Plaintiff who complained about such conduct.

263. As the employer and/or supervisor of Plaintiff, Koufos is vicariously, strictly, and/or directly liable to Plaintiff pursuant to the LAD, in that the affirmative acts of harassment, discrimination, and retaliation committed by himself, his Chairman of the Board of Trustees, his Executive Director, and his Facility Director, namely McGreevey and Dunnells, and occurred within the scope of their employment; the creation of the hostile work environment was aided by Koufos in delegating power to McGreevey and Dunnells, to control the day-to-day working environment; and/or Koufos was deliberately indifferent, reckless, negligent and/or tacitly approved the discrimination, hostile work environment, and/or retaliation; and/or Koufos, failed to create and/or have in place well-publicized and enforced anti-harassment policies, effective formal and informal complaint structures, training, and/or monitoring mechanisms for same, despite the foreseeability of harassment, discrimination, and retaliation in the workplace; and/or by having actual knowledge of the harassment, discrimination, and retaliation of Plaintiff and failing to promptly and effectively act to stop it.



264. Koufos aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce McGreevey and Dunnells, to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering all Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e).

265. McGreevey, Koufos, and Dunnells, all as superiors of Plaintiff, aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce each other to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering himself and all defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e)

266. The acts and/or omissions of Koufos were the cause of Plaintiff's harm, and the acts and/or omissions of Koufos were actuated by actual malice or accompanied by a wanton and willful disregard of person who foreseeably might be harmed by those acts or omissions.

267. Plaintiff's employment was subsequently terminated by Defendants.

268. The decision to terminate Plaintiff's employment was causally connected and/or motivated in part and/or determined in part by Plaintiff's protect conduct.

269. Koufos participated in the decision to terminate Plaintiff's employment and/or provided assistance to NJRC/JCETP in discriminatorily and/or retaliatory terminating Plaintiff's employment.

270. In this regard, Koufos was generally aware of his role in the overall illegal, discriminatory and retaliatory activity at the time that he provided the assistance.

271. In retaliation for Plaintiff engaging in the aforementioned protected activity, McGreevey terminated Plaintiff's employment.

272. As a direct and proximate result of Koufos conduct, Plaintiff has suffered emotional distress, compensatory and other damages.

273. Because the unlawful discrimination and/or termination was undertaken by members of upper management, including Koufos, and was undertaken intentionally, egregiously, maliciously and with a willful or wanton disregard for the rights of Plaintiff, punitive damages are appropriate.

COUNT FOUR

**DISCRIMINATION, HARASSMENT, RETALIATION, AIDING  
(DUNNELLS)**

274. Plaintiff incorporates by reference all prior paragraphs as if fully set forth at length herein.

275. Dunnells, as the Facility Director of the Toms River location of NJRC, is a person liable under the LAD for discrimination against Plaintiff in terms, conditions or privileges of employment because of the sex of Plaintiff.

276. Dunnells, as the Facility Director of the Toms River location of NJRC, is a person liable under the LAD for taking reprisal against Plaintiff because he opposed discriminatory conduct.

277. Dunnells, as the Facility Director of the Toms River location of NJRC, is a person liable under the LAD for aiding and abetting the discrimination and retaliation against Plaintiff.

278. The pattern and practice of discrimination, harassment, and retaliation directed at Plaintiff by employees, including Dunnells, of NJRC/JCETP is outlined above.

279. Plaintiff was subjected to repeated, pervasive, severe, and continuing instances of disparate treatment and harassment by Dunnells because of Plaintiff's sex, male, as set

forth above.

280. Dunnells regularly targeted, discriminated and retaliated against Plaintiff because of his sex, male, as set forth above.

281. The above-described conduct would not have occurred but for Plaintiff being of the male sex.

282. The above-described harassing and discriminatory conduct was severe and pervasive enough to make a reasonable person believe that the conditions of employment were altered, and the working environment was hostile and discriminatory.

283. Plaintiff specifically complained to Dunnells concerning the discrimination and harassment he was being subjected to, as set forth above at length, because of his sex, male, as set forth above, that none of his co-workers who were all female were subjected to, and that would not have occurred but for the fact that he is a male.

284. Plaintiff's conduct in this regard was protected under the LAD.

285. Dunnells took adverse employment actions against Plaintiff in retaliation for Plaintiff engaging in the aforementioned protected conduct.

286. Koufos aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce McGreevey and Koufos, to commit acts and omissions that

were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering all Defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e).

287. McGreevey, Koufos, and Dunnells, all as superiors of Plaintiff, aided, abetted, incited, compelled and/or coerced, and/or attempted to aid, abet, incite, compel and/or coerce each other to commit acts and omissions that were in violation of the LAD by committing affirmatively harassing, discriminatory, and retaliatory acts toward Plaintiff in violation of the supervisory duty to halt or prevent harassment, retaliation, and discrimination, rendering himself and all defendants individually and collectively liable to Plaintiff pursuant to N.J.S.A. 10:5-12(e)

288. The acts and/or omissions of Dunnells were the cause of Plaintiff's harm, and the acts and/or omissions of Koufos were actuated by actual malice or accompanied by a wanton and willful disregard of person who foreseeably might be harmed by those acts or omissions.

289. Plaintiff's employment was subsequently terminated by Defendants.

290. The decision to terminate Plaintiff's employment was

causally connected and/or motivated in part and/or determined in part by Plaintiff's protect conduct.

291. Dunnells participated in the decision to terminate Plaintiff's employment and/or provided assistance to NJRC/JCETP, McGreevey, and/or Koufos in discriminatorily and/or retaliatory terminating Plaintiff's employment.

292. In this regard, Dunnells was generally aware of her role in the overall illegal, discriminatory and retaliatory activity at the time that she provided the assistance.

293. In retaliation for Plaintiff engaging in the aforementioned protected activity, McGreevey terminated Plaintiff's employment.

294. As a direct and proximate result of Dunnells conduct, Plaintiff has suffered emotional distress, compensatory and other damages.

295. Because the unlawful discrimination and/or termination was undertaken by members of upper management, including Dunnells, and was undertaken intentionally, egregiously, maliciously and with a willful or wanton disregard for the rights of Plaintiff, punitive damages are appropriate. terminated from employment.

#### VI. PRAYER FOR RELIEF

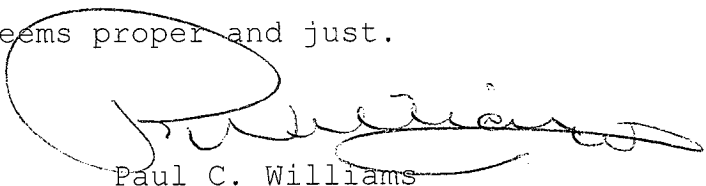
**WHEREFORE**, Plaintiff respectfully prays that this Court

enter a judgment granting Plaintiff:

A. A declaratory judgment stating that the acts and omissions described herein violated the law against discrimination.

B. Award compensatory and punitive damages, attorney fees, interest and costs of suit incurred, and for any such further relief as the Court deems proper and just.

Dated: December 1, 2020

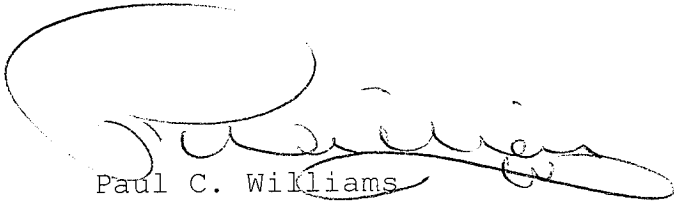


Paul C. Williams  
35 Broad Street, #C4  
Toms River NJ 08753-6564  
732.998.6707  
Plaintiff, Pro Se

**DEMAND FOR TRIAL BY JURY**

Plaintiff hereby demands a trial by jury by all issues and claims.

Dated: December 1, 2020




Paul C. Williams

**CERTIFICATION; R. 4:5-1**

Plaintiff hereby certifies that there are no other proceedings or pending related cases arising from the same factual dispute described herein. The matter in controversy is not the subject of any other action pending in any other court or a pending arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, the

undersigned knows of no other parties that should be made a part of this lawsuit. In addition, the undersigned recognizes the continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: December 1, 2020



Paul C. Williams