

## SETTLEMENT AGREEMENT

This SETTLEMENT AGREEMENT including Attachment A ("AGREEMENT") is made and entered into by and between **Redacted**, **Red** family, **Red** heirs, representatives, **Red** properties, successors and assigns (collectively, **Red**), LA FARINE BAKERY and all of its respective current, former, and future parent corporations, subsidiary corporations, officers, owners, shareholders, directors, managers, agents, representatives, employees, attorneys, plans, trusts, administrators, fiduciaries, successors, predecessors and assigns (hereinafter referred to as "LA FARINE") and the United States Department of Justice, Civil Rights Division, Office of Special Counsel for Immigration-Related Unfair Employment Practices (hereinafter referred to as "OSC"), **Redacted**. LA FARINE and OSC are hereinafter referred to collectively as the "Parties."

### RECITALS

A. **Redacted** was employed by LA FARINE from 2008 until 2014. A dispute has arisen between **Redacted** and LA FARINE with regard to **Redacted** employment with LA FARINE. After **Redacted** changed her legal status in the U.S., **Red** presented a valid Social Security Number and Employment Authorization Document in 2013 to LA FARINE, but LA FARINE refused to accept the document.

B. On or about May 18, 2014, **Redacted** filed a Charge with OSC against LA FARINE alleging a violation of the unfair immigration-related employment practices provisions of 8 U.S.C. § 1324b (the "Act"), DJ# 197-11-762 (hereinafter referred to as the "OSC Charge").

C. On or about August 1, 2014, **Redacted** filed a retaliation complaint against LA FARINE with the California Division of Labor Standards Enforcement, State Case No. 36581-SACRCI (hereinafter referred to as the "DLSE Complaint").

D. On August 18, 2014, OSC concluded, based upon its investigation of **Redacted** charge, that there is reasonable cause to believe that LA FARINE rejected **Redacted** valid work authorization documentation because of **Red** citizenship status in violation of 8 U.S.C. § 1324b.

E. LA FARINE denies and disputes the DLSE Complaint. LA FARINE understands its individuals equally, without regard to citizenship or the hiring, firing, and employment eligibility verific

F. LA FARINE proposes that the Part delay or expense. In addition, **Redacted** and LA I pending, potential or future disputes between them made in the DLSE Complaint.