

By: Scott M. Pollins
Pollins Law
303 W. Lancaster Ave., Ste. 1C
Wayne, PA 19087
(610) 896-9909 (phone), (610) 896-9910 (fax)
scott@pollinslaw.com

Attorney for Plaintiff, Megan Brown

MEGAN BROWN	:	
Plaintiff,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION – CAPE MAY COUNTY
v.	:	
	:	
BOROUGH OF STONE HARBOR:	:	Civil Action - DOCKET NO.
and	:	
MANUEL PARADA	:	<u>COMPLAINT and JURY DEMAND</u>
Defendants	:	

Plaintiff, Megan Brown (Brown), complaining of Defendants, alleges as follows:

1. At all times mentioned, Defendant, Borough of Stone Harbor, (Borough), was and is a New Jersey municipality located at 9508 Second Avenue, Stone Harbor, NJ, 08247.

2. Defendant, Manuel Parada (Parada), is the Borough Administrator for Borough. As the Borough Administrator, Parada is the chief executive officer and top-ranking employee of the Borough.

3. Brown started working for Borough in March 2020 as a receptionist.

4. Brown is a single mother of two school age children.

5. In March 2023, Parada became the Borough’s Interim Borough Administrator and Brown’s immediate supervisor.

6. In April 2023, Brown met Parada’s wife, who had come into the Borough’s office. Mrs. Parada mentioned she makes jewelry, and she has a pair of earrings that would match Brown’s blouse perfectly.

7. A few days later, Parada brought the earrings his wife was referring to into the office and gave them to Brown as a gift.

8. Parada's unsolicited gift to Brown was unwelcome. Additionally, Brown felt that Parada was trying to make an intimate connection with her, and this made her uncomfortable.

9. Shortly thereafter, Parada told Brown about he and his wife were arguing at home about something Brown said at a Borough council meeting that Brown and Parada laughed at together during their interactions before the meeting.

10. Parada's comment to Brown was unwelcome and made Brown feel uncomfortable.

11. In May 2023, Brown was talking with her co-workers about a spider she had in her house. Parada overheard this and commented to Brown that "You can call me for anything, any time of the night or day if you need any help around the house."

12. Parada's comment was unwelcome and made Brown feel uncomfortable. Brown had never invited Parada to her home, and she felt uncomfortable with him saying he was willing to go to her home at any time of day or night.

13. Later that evening, Brown received a text from Parada's wife with a link to purchase spider killer spray. This was unwelcome and Brown felt like this was another coercive attempt by Parada (using his wife) to make an intimate connection with her. By this time, Parada knew or should have known his wife communicated with Brown.

14. On June 25, 2023, Mrs. Parada texted Brown about Parada's birthday and how the office should not draw attention to his birthday. This was unwelcome.

15. Thereafter, Parada began repeatedly making comments to Brown like “You don’t know how hard it is to work around you, you’re young, beautiful, smart, hard-working, and single, but I’m not telling you these things because I want to have sex with you.”

16. Parada’s comments to Brown were unwelcome and offensive and made Brown feel uncomfortable.

17. Parada once commented to Brown when they were discussing the Borough dress code that he doesn’t care about the gift wrap, he only cares about the gift. This was unwelcome and made Brown feel uncomfortable.

18. Parada told Brown about arguments he had with his wife about him taking the position of full-time Administrator. Parada also made disparaging comments about his wife to Brown. Parada told Brown that his wife did not want him working with Brown. Parada’s conduct toward Brown was unwelcome and made her feel uncomfortable.

19. Parada’s repeated comments about his wife forced Brown to hide in the breakroom or bathroom whenever she saw Parada’s wife approaching the Borough’s office. This made Brown feel uncomfortable and disrupted her work.

20. In July 2023, Parada texted Brown and a female co-worker of hers. In his text, Parada stated that he and his wife may be separating. Parada’s text about his marriage was unwelcome and made Brown feel uncomfortable.

21. That same week, another co-worker approached Brown and told Brown he heard a rumor. When Brown asked what the rumor was, the co-worker said “I don’t even want to repeat it.” The co-worker then asked Brown if Parada was leaving his wife.

Brown later learned the rumor was that Parada was leaving his wife to be with Brown. This made Brown feel extremely uncomfortable.

22. On July 17, 2023, Parada had flowers delivered to Brown at work with a card that said "I cannot thank you enough for stepping up the way you have, maybe this is a start." This was unwelcome and made Brown feel uncomfortable.

23. In September 2023, Emily Dillon became the Borough Clerk.

24. Thereafter, Parada told Brown she was yesterday's old news and Ms. Dillon was the new shiny toy. Parada also made demeaning comments to Brown in front of her and her co-workers and other professionals who were in the Borough's office. This was unwelcome and made Brown feel uncomfortable, embarrassed and humiliated.

25. Parada once commented to Brown about a Borough resident that had given him a difficult time being a 'Karen', and that one day that will be Brown, old and alone and asking to speak to the manager. This was unwelcome and made Brown feel uncomfortable, embarrassed and humiliated.

26. On another occasion, Brown mentioned she was taking a half day off from work and Parada asked her if she had a job interview. He then looked her up and down and said "you've been dressed a lot nicer than that, but you can stop home and get changed first, right?" This was unwelcome and made Brown feel uncomfortable.

27. Parada once commented that he was old enough to be Ms. Dillon's dad. Brown said he could be many people's dads who work at the Borough. Parada then said "oh do you all want to call me daddy." This was unwelcome and made Brown feel extremely uncomfortable.

28. On another occasion, Parada commented to the recreation director who was doing interviews about how good she looked in her dress and how he can't wait to see what she wears for tomorrow's interviews. Parada's comment was unwelcome and made Brown feel uncomfortable.

29. On December 6, 2023, Shant Zakarian, an outside employment lawyer, approached Brown to interview her. Mr. Zakarian asked Brown for details of the harassing conduct Parada had engaged in with her to that point.

30. After Brown was interviewed, Ms. Dillon informed her that she had received a notice from Summit Risk naming Brown as a claimant in an open investigation against Parada. At this time, Brown had not made a formal complaint about Parada for fear of losing her job or being retaliated against by Parada. Brown asked Ms. Dillon and the Borough's CFO, Jim Craft, for more information about this investigation and neither provided any information to her.

31. On December 7, 2023, Parada told Ms. Dillon that he was having a Christmas Party for the Public Works employees. Ms. Dillon asked Parada why the Public Works employees get a party, but the other Borough employees do not. Parada replied "because those employees don't try to sue me." Brown heard this and it made her feel uncomfortable.

32. Upon information and belief, when Parada referred to employees trying to sue him, he was referring to Brown and Kimberly Stevenson (Stevenson). Stevenson is a former Borough employee who had previously informed the Borough, through her legal counsel, that Parada had sexually harassed her when she worked for the Borough.

33. Brown heard Parada make threatening comments such as “These people don’t know who they are f***king with” and “I don’t play nice when people try to f**k with me” and “I can make life very difficult for them.” These comments made Brown extremely uncomfortable and concerned for her safety.

34. Around this time Brown spoke with Mr. Craft. He told Brown that he made a recommendation that Parada and Brown do not work in the same office. Parada did not agree to this, nor did he agree to Brown working from home or after hours when Parada was not there.

35. By this point, Brown was having serious emotional issues due to the hostile work environment Borough and Parada were subjecting her to. As a result of the stress and anxiety she was experiencing, Brown took a medical leave of absence from December 13-31, 2023.

36. Around this time Brown learned that Parada had emailed Ms. Dillon advising her that since Brown’s appointment as Deputy Clerk was expiring on 12/31/23 (at which time Brown would start in a compliance job working directly with Parada) that Ms. Dillon would have to decide whether to keep Brown as Deputy.

37. Brown felt that Parada was attempting to force Ms. Dillon to fire her instead of Parada doing it himself.

38. On January 2, 2024, Brown started working in a different position as Compliance Clerk. This position reported directly to Parada.

39. On January 25, 2024, Brown applied for the position of Technical Assistant to the Construction Official (TACO). Brown met the qualifications for this position, and she knew the position very well because her mother, Suzanne Brown, had served in that

position for nearly 25 years. Most important to Brown, if she were hired into the TACO position, she would no longer directly report to Parada.

40. On January 31, 2024, Brown submitted a written hostile work environment complaint to the Borough, Parada, and Borough Council. *Exhibit 1*, January 31, 2024 complaint.

41. On February 1, 2024, Brown learned that Parada had sent an email stating that the job posting for the TACO position was incorrect and changes were being made to the requirements for the position. The changes made were to change the start/end times to 7:00am-3:30pm and to allow for a 30 minute lunch instead of a one hour lunch.

42. Upon information and belief, Parada and/or Borough Council changed the TACO job requirements or had the job requirements changed in an effort to dissuade Brown from seeking the position and/or in retaliation for her hostile work environment complaint she had made a day earlier.

43. Brown informed Borough Construction Official Raymond Poudrier that she was still interested in the TACO position even with the change in work hours.

44. On February 5, 2024, Mr. Poudrier informed Brown that the job posting for the TACO position was being withdrawn until further notice.

45. Also on February 5, 2024, Brown again met with Mr. Zakarian, who Borough had apparently originally retained to investigate a complaint made by Brown's co-worker on her behalf.

46. During their meeting, Mr. Zakarian informed Brown that Parada denied the allegations contained in her hostile work environment complaint. Furthermore, Mr. Zakarian told Brown that Parada had made a number of salacious allegations against

Brown, including that 1) Brown had supposedly asked Parada to harass her at work so she could file a harassment claim and get money from the Borough, 2) Brown is fixated on money and had asked Parada to borrow \$20,000, 3) Brown had an 'OnlyFans'¹ account, and 4) Brown asked Parada to have a pool party at his house so he could see her in a bathing suit.

47. All of Parada's allegations against Brown are untrue.

48. Parada made these false allegations against Brown in an attempt to destroy her credibility and retaliate against her for complaining about him harassing her.

49. On February 9, 2024, Brown submitted additional documentation to the Borough to substantiate her hostile work environment and what had now also become a retaliation complaint. *Exhibit 2*, February 9, 2024 memo from Brown.

50. Included in the documents Brown submitted was her text exchange with Parada from early August 2023 attached below. Her texts are on the right side and Parada's texts are on the left side. Upon information and belief, Parada referred to the Borough Mayor as a c*nt in his text to Brown attached below. Brown was extremely offended by Parada's text.

¹ OnlyFans is an internet content subscription service based in London, United Kingdom. The service is used primarily by sex workers who produce pornography. [OnlyFans - Wikipedia](#) (accessed 3/20/24).

Tue, Aug 1 at 7:59 PM

I got friggin stuck with her 😡

I wouldn't piss on that cunt if she was on fire. My urine is better than her



I am seriously pissed off right now. I'm pretty sure I'm taking the rest of the week off and re-evaluate my life here. I'm also questioning my sobriety right now.

I'll let you know in the morning, but you can count on me being out

51. On February 22, 2024, Mr. Poudrier informed Brown that the TACO position will be internally re-posted to all Borough employees for two weeks prior to being publicly posted if no internal transfer employee is found.

52. On February 23, 2024, Brown emailed Mr. Poudrier to confirm she was still interested in being hired for the TACO position.

53. On February 28, 2024, Mr. Poudrier informed Brown that the search for the TACO position was being suspended.

54. On March 4, 2024, Brown submitted a supplemental hostile work environment and retaliation complaint relating to her applying for the TACO position and the Borough, in conjunction with Parada, altering and then repeatedly withdrawing the job posting. *Exhibit 3*, March 4, 2024 supplemental complaint.

55. Also on March 4, 2024, Brown signed a memo from her and seven other Borough employees to Borough's newly hired HR Director, Peter Webster, complaining about the current state of the work environment at the Borough. *Exhibit 4*.

56. Borough and Parada subjected and are subjecting Brown to a severe or pervasive sexually hostile and retaliatory work environment.

57. Brown reasonably believed that Defendants' conduct was in violation of law or a rule or regulation promulgated pursuant to law or was incompatible with a clear mandate of public policy.

58. In addition to Borough's liability in this matter, Parada is individually liable because he had and has the authority to direct and control Brown's work performance, and he had and has the ability to take corrective action regarding the violations Brown complained of.

Count I – Sexual Harassment
New Jersey Law Against Discrimination

59. Paragraphs 1 through 58 are incorporated by reference as if fully set forth herein.

60. The acts, failures to act, practices and policies of Defendants set forth above constitute sexual harassment in violation of the New Jersey Law Against Discrimination.

61. As a result of Defendants' illegal sexual harassment, Brown has suffered harms and losses in the form of emotional/mental distress, anxiety, stress, humiliation and embarrassment.

WHEREFORE, Brown demands judgment in her favor and against Defendants, jointly and/or severally, for compensatory damages, punitive damages, attorney's fees plus costs, declaratory relief that the conduct engaged in by Defendants violated Brown's civil rights, equitable/injunctive relief directing Defendants to cease any and all unlawful sexual harassment, adopt and enforce an effective sexual harassment policy, retain and train an Equal Employment Opportunity/Affirmative Action Officer² and regularly conduct sexual harassment training and such other relief as the Court shall deem proper.

Count II - Retaliation
New Jersey Law Against Discrimination

62. Paragraphs 1 through 58 are incorporated by reference as if fully set forth herein.

63. The acts, failures to act, practices and policies of Defendants set forth above constitute retaliation (including retaliatory harassment) in violation of the New Jersey Law Against Discrimination.

² Borough's October 2021 Employee Handbook and October 2021 Policies and Procedures Manual both state that hostile work environment and harassment complaints should be made to the Equal Employment Opportunity/Affirmative Action Officer, however Borough has no such individual currently employed at the Borough or designated to serve in such role.

64. As a result of Defendants' illegal retaliatory conduct, Brown has suffered harms and losses in the form of emotional/mental distress, anxiety, stress, humiliation and embarrassment.

WHEREFORE, Brown demands judgment in her favor and against Defendants, jointly and/or severally, for compensatory damages, punitive damages, attorney's fees plus costs, declaratory relief that the conduct engaged in by Defendants violated Brown's civil rights, equitable/injunctive relief directing Defendants to cease any and all unlawful retaliation against employees who complain about sexual harassment or sex discrimination and such other relief as the Court shall deem proper.

**Count III – Whistleblower Retaliation
New Jersey Conscientious Employee Protection Act**

65. Paragraphs 1 through 58 are incorporated by reference as if fully set forth herein.

66. The acts, failures to act, practices and policies of Defendants set forth above constitute retaliation (including retaliatory harassment) in violation of the New Jersey Conscientious Employee Protection Act.

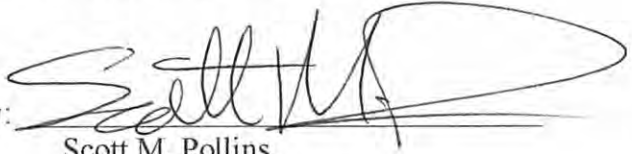
67. As a result of Defendants' illegal retaliatory conduct, Brown has suffered harms and losses in the form of emotional/mental distress, anxiety, stress, humiliation and embarrassment.

WHEREFORE, Brown demands judgment in her favor and against Defendants, jointly and/or severally, for compensatory damages, punitive damages, attorney's fees plus costs, declaratory relief that the conduct engaged in by Defendants violated Brown's civil rights, equitable/injunctive relief directing Defendants to cease any and all unlawful

whistleblower retaliation against employees who complain about sexual harassment or sex discrimination and such other relief as the Court shall deem proper.

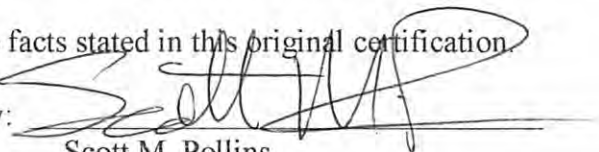
DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Scott M. Pollins is hereby designated as trial counsel for Brown in this matter.

By: 
Scott M. Pollins

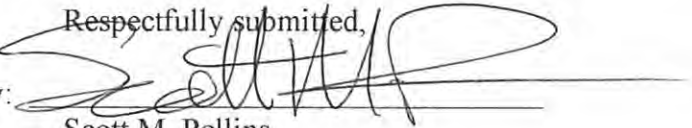
CERTIFICATION OF NO OTHER ACTIONS

Pursuant to Rule 4:5-1, the matter in controversy is not the subject of any other action pending in any other court or of a pending proceeding to the best of my knowledge or belief. Also, to the best of my belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party 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.

By: 
Scott M. Pollins

JURY DEMAND

Brown hereby demands trial by a jury on all of the triable issues of this Complaint, pursuant to R 1:8-2(b).

Respectfully submitted,
By: 
Scott M. Pollins
Attorney for Plaintiff, Megan Brown

Date: 4/12/24

EXHIBIT 1

From: Deputy Clerk

Sent: Wednesday, January 31, 2024 4:19 PM

To: Judith Davies-Dunhour <DaviesJ@shnj.org>; Marcus Karavan <marcus@karavanmorris.com>; Frank Dallahan <DallahanF@shnj.org>; Jennifer Gensemer <GensemerJ@shnj.org>; Robin Casper <CasperR@shnj.org>; Bunny Parzych <ParzychB@shnj.org>; Victor Foschini <foschiniv@shnj.org>; Tim Carney <carneyt@shnj.org>

Cc: Emily Dillon <DillonE@shnj.org>; Manny Parada <paradam@shnj.org>

Subject: RE: Hostile Work Environment Complaint- Borough of Stone Harbor 1.31.2024

Please see attached hostile work environment claim.



Megan Brown | Compliance Specialist | Zoning Board Secretary

Borough of Stone Harbor

9508 Second Avenue, Stone Harbor, NJ 08247

BrownM@shnj.org | Ph: 609.368.6800 Opt. 2

SHNJ.ORG



To: Emily Dillon, Borough Clerk – boroughclerk@shnj.org
Judith M. Davies-Dunhour, Mayor – daviesj@shnj.org
Frank Dallahan, Council President – dallahanf@shnj.org
Jennifer Gensemer, Council Member – gensemerj@shnj.org
Robin Casper, Council Member – casper@shnj.org
Bunny Parzych, Council Member – parzychb@shnj.org
Victor Foschini, Council Member – foschiniv@shnj.org
Tim Carney, Council Member – carneyt@shnj.org
Marcus H. Karavan Esq., Borough Solicitor - marcus@karavanmorris.com
Manuel Parada, Borough Administrator – paradam@shnj.org

From: Megan Brown

Date: 1/31/24

Subject: Hostile work environment complaint

I started working for the Borough of Stone Harbor in March 2020.

In March 2023, Manuel Parada started as the Interim Borough Administrator.

In April 2023, I met Mr. Parada's wife, Beverly. She came into the office with her friend one day, we were all chatting, she mentioned that she makes jewelry as a hobby, and she has a pair of earrings that would match my blouse perfectly. A few days later Mr. Parada brought the earrings into the office for me as a gift. In hindsight, however, I now believe this was Mr. Parada's initial attempt to make an intimate connection with me.

Shortly after that day, Mr. Parada's wife came to a council meeting. The next day when Mr. Parada came to work, he was noticeably upset and moping around the office. He asked me if I remembered what I said to him before the meeting started and when I asked what he meant, he explained that he and his wife were arguing when he got home from the meeting because of something I said and he and I had both laughed at afterwards. I felt this was odd that Mr. Parada was sharing this private and personal information with me.

In May of 2023, I was sharing a story with my co-workers in which I had to call a family member the night before at 10pm to come kill a spider in my house. Hearing what I said, Mr. Parada commented that "You can call me for anything, any time of the night or day if you need any help around the house." I felt very uncomfortable with Mr. Parada's comment, so I just tried to ignore it.

Later that night while I was at home, I received a text from Mr. Parada's wife with a link to purchase spider-killer spray from Amazon along with a text saying, "Here's what you can use for next time." I did not know how Mr. Parada's wife was even aware of what I had said at work with my co-workers other than my guessing that Mr. Parada had told his wife about what I said.

On June 25, 2023, Mr. Parada's wife sent me a long text saying that her husband Mr. Parada cannot know about this text, but our office should NOT draw any attention to Mr. Parada's birthday (which I did not even know when it was) or make any mention of it. In her text, Mr. Parada's wife told me a story of her giving him a surprise birthday party years back and he pretended to enjoy it while other people were around but once it was over and they were alone he told her how uncomfortable he was the whole time and how angry he was at her for doing it. She stated for me to please not tell him that she told me because he would be upset about that too.

I began to be concerned about the communications I was receiving from Mr. Parada's wife as well as Mr. Parada's conduct toward me at work.

Mr. Parada began repeatedly making comments, by text and verbally, to me like, "You don't know how hard it is to work around you, you're young, beautiful, smart, hard-working, and single, but I'm not telling you these things because I want to have sex with you." I was horrified about this particular comment and felt sick to my stomach. All of these overly complimentary comments made me feel very uncomfortable.

We were speaking one day about the dress code and Mr. Parada stated that he doesn't worry too much about the dress code because 'he doesn't care about the gift wrap, he only cares about the gift'. Mr. Parada's comments again made me uncomfortable, and I started to get the sense that these things were happening because I was single and not married.

I tried to keep a productive working environment, but it became more difficult when Mr. Parada started telling me that he and his wife were having arguments over his working with me and that she didn't want him taking the position as full-time administrator. He also started to make disparaging remarks about his wife to me. Again, I felt uncomfortable with him telling me this. It was awkward when Mr. Parada's wife came into the office. It reached the point where I would see her car pull up or hear her voice and I would go to the breakroom or bathroom to avoid seeing her.

In July 2023, I received a text from Mr. Parada. He texted me and my co-worker Carrie Bosacco, who is Mr. Parada's assistant at Public Works. In the text, he stated that he may need to take a personal day and he went on to explain that he and his wife may be separating and asked that we not share that with anyone, because 'he is not ready to let the world know that he failed at marriage again. Maybe it's not completely over, maybe we can bounce back, who knows.' This is yet another example of Mr. Parada oversharing with me (and my female co-worker) about his personal life and his marriage. This made me feel uncomfortable.

That same week I was approached by a co-worker who said that he heard a rumor. I asked what the rumor was, and he replied, "I don't even want to repeat it". He then asked me if Mr. Parada was leaving his wife, I said no and I left it there.

Months later, in October, I was told by this same person that the rumor going around was that Mr. Parada was leaving his wife to be with me. This made me extremely uncomfortable for many reasons, including that it was completely false.

On July 17, 2023, Mr. Parada had flowers delivered to me at work with a card that said 'I cannot thank you enough for stepping up the way you have, maybe this is a start.' I went into his office and said thank you for the gesture, but I'm just doing my job, he said 'no you have done way more than that'. This was another time where I felt uncomfortable with a male superior making overly forward comments, even if his comments were cloaked in him supposedly complimenting my work.

I told Mr. Parada that it was inappropriate (for him to give me flowers) and that my co-workers are going to ask where the flowers came from. He responded, "who cares what they think". A second set of flowers were sent to me a month later, on my birthday, with a card that read 'from your biggest fans'. I believe Mr. Parada sent those flowers as well.

All while this was happening, I was being encouraged to step into the Clerk's position, which I did apply for, but withdrew shortly after getting a bad feeling about taking on that role. I realize now that I got that bad feeling because if I got the clerk position, which paid more than what I was making, people would have assumed that the rumor was true (that Mr. Parada left his wife to be with me).

The Clerk's position was filled in September 2023. Mr. Parada started saying things to me like, "Well now that she'll be here, you're yesterday's old news, and she is the new shiny toy." Also, once the Clerk (Emily Dillon) started, he started to make demeaning comments to me in front of her as well as other co-workers and professionals.

One day, we were all chatting together, and he brought up a resident giving him a hard time and referred to her as a 'Karen' and looked to me and said that will be you one day Megan, old and alone and asking to speak to the manager.

Another day I mentioned I was taking a half day and Mr. Parada asked for what, a job interview? I laughed uncomfortably and he looked me up and down and said, "you would've been dressed a lot nicer than that, but you can stop home and get changed first, right?"

Mr. Parada also made many comments about age. During one conversation he said to the new Clerk that he is old enough to be her dad. I said he could be many people's dads who work here. Mr. Parada then said "oh do you all want to call me daddy." This made everyone around at the time very uncomfortable.

I have also heard him make comments to other women in my office. One day our rec director was doing job interviews with Mr. Parada and when they came out of the conference room, we overheard him talking about her outfit selection and how good she looked in her dress and how he can't wait to see what she wears for tomorrow's interview. This made me feel uncomfortable.

At some point I heard someone say that Mr. Parada's wife used to be his secretary. When I heard this, I became concerned even more about Mr. Parada's offensive conduct toward me.

On December 6, 2023, I was at my desk working and I was approached by Shant Zakarian (conflict counsel) to do an interview with me. I was completely caught off guard. When he

started to interview me, he asked for details about some of the things I mentioned above. This interview was not recorded until the end, when he asked that I give a recorded statement on how all of those things made me uncomfortable.

After the interview, Ms. Dillon told me that she had received a notice from Summit Risk (date stamped on Nov. 15th) that names me as a claimant in an open investigation against Mr. Parada. I asked for a copy of the notice, however she did not provide it to me. I called the risk management company, Summit Risk, and left a message, but never received a call back. I asked Jim Craft, our CFO and JIF coordinator, for a copy of the letter/notice. I understand Mr. Craft emailed the JIF contact, but he was told that I am not allowed to have any information pertaining to this investigation.

Since I became aware of a complaint submitted apparently on my behalf without my knowledge, Mr. Parada has come into the Borough making rude comments to others, directly in front of me. He went to the Clerk on December 7, and he stated that he was having a Christmas party for the public works employees on Friday and invited her to come. When she asked why Public Works employees get a party, but we don't, he replied, 'because those employees don't try to sue me'. I was 5 feet away from him, and he knew I could hear him say that. He was suggesting that Borough employees do not deserve a Christmas party because of me. I feel this was Mr. Parada's attempt to try to get other employees to dislike me.

I have heard him make statements about others such as 'these people don't know who they are (f***ing) with and that 'he doesn't play nice when people try to (f***) with him and that 'he can make life very difficult for them.' Those comments in particular now have me concerned for my safety.

I tried to continue to come into work, but I was having a very hard time concentrating and I was having emotional issues from all of this. I had a conversation with the CFO/JIF coordinator, Jim Craft, and he informed me that he made a recommendation that Mr. Parada and I do not work in the same office while this is pending. Mr. Parada has two offices in separate buildings, and several options were discussed, but I was told he was not willing to take that recommendation. Another option that Jim and I suggested was for me to move my office temporarily, which there were plenty of open areas for me to do that. Another idea was I could work after hours, or work from home, there were several ways for me to continue to work. None of those options were approved and nothing was being done to remedy the situation, they wanted me to quietly go away.

I am unsure why my requests were denied. I had a conversation with Ms. Dillon where I was told that our labor council, Nicole Curio, advised her that 'we do not have a work from home policy'. However, I know of 3 employees that are currently working from home on an as needed basis, one just had major surgery, one is having childcare issues, and one has health issues. So, it was a clear attempt to make it difficult for me to continue to work.

Because of my anxiety due to the hostile work environment, I took a medical leave of absence from December 13 -31. During this time, I had several doctor appointments to discuss the anxiety and panic I was having from this situation and the fear of losing my job/benefits. I am a

single mother of two boys and the head of my household, so I heavily rely on my job and health benefits. I started taking an anti-anxiety medication because of this ordeal, and I am being seen regularly by my doctor to monitor my medication and anxiety levels.

I learned that on Thursday December 7, Mr. Parada sent an email to Ms. Dillon advising her that since my appointment as Deputy is up on 12/31/23, at which time I was to start the compliance job, working directly with Mr. Parada. Mr. Parada told Ms. Dillon that she would have to make the decision to keep me as Deputy or not. I believe this was an attempt by Mr. Parada to have Ms. Dillon get rid of me rather than him get rid of me.

I returned to work and started my new position as a Compliance Clerk on 1/2/24. Since then, I have had to communicate with Mr. Parada through another employee. I am now constantly worried that I will be retaliated against, and I am always looking over my shoulder and over thinking everything, fearing I am being set up in some way to get me in trouble or fired or that they will just abolish my position and get rid of me. This feeling of paranoia is dreadful. I am second guessing everything I do or say, my confidence as an employee is way down, which is not a healthy way to work efficiently.

The position for the job in the construction office has been posted and I have applied for it. My hope is that I can move into that office which will get me away from Mr. Parada. I am well qualified for the position, and I already have the required credentials.

It's taken a lot for me to muster the courage to formally make this hostile work environment complaint. I've been concerned that if I did so, I would be blackballed and retaliated against. I believe I am being discriminated against due to my gender by Mr. Parada and for refusing and ignoring his advances toward me. I request the Borough conduct an investigation into my complaint.

Please forward this complaint to the Borough's Affirmative Action Officer.

By: Megan Brown
Megan Brown

EXHIBIT 2

From: Deputy Clerk <brownm@shnj.org>

Sent: Friday, February 9, 2024 6:56 PM

To: Judith Davies-Dunhour <DaviesJ@shnj.org>; Frank Dallahan <DallahanF@shnj.org>; Jennifer Gensemer <GensemerJ@shnj.org>; Bunny Parzych <ParzychB@shnj.org>; Robin Casper <casper@shnj.org>; Victor Foschini <foschiniv@shnj.org>; Tim Carney <carneyt@shnj.org>

Cc: Emily Dillon <DillonE@shnj.org>; ZakarianPLLC <zakarianpllc@gmail.com>

Subject: RE: Additional Written Documentation to Hostile Work Environment and Retaliation Complaint

Dear Mayor Davies-Dunhour and Councilmembers

Attached please find various written communications from Mr. Parada (and his wife) which corroborates many of the allegations that I have made against Mr. Parada in my initial complaint of Hostile Work Environment dated January 31, 2024. Several of these communications also refute Mr. Parada's recent false accusations against me and demonstrate a clear propensity for him to retaliate against those who stand as an adversary to him. It has taken me considerable effort to locate these communications and they represent only a portion of similar written materials that I have received over the past year from Mr. Parada. I will work diligently to recover many more of the same, but I wanted to provide these items as soon as possible, especially in light of Mr. Parada's recent false accusations against me. Kindly make the attached written communications, with the brief contextual description of each, set forth below, part of both my original complaint on January 31, 2024 for Hostile Work Environment as well as part of the additional complaint for Retaliation as set forth in my email to you on February 7, 2024.

Attachments:

MPFLOWERS1: Card that accompanied flowers sent to by Mr. Parada commending me and saying "Hopefully this is a start."

MPWIFE TEXT1: Text message from Mr. Parada's wife to me with link to spider repellent as it relates to my narrative regarding the same in my original complaint.

MPWIFETEXT2: Text message from Mr. Parada's wife to me advising me about Mr. Parada and his birthday as it relates to my narrative regarding the same in my original complaint.

MPTEXT1: Text message from Mr. Parada sharing private details of both his marital problems and his problems with his employment as it relates to my narrative regarding the same in my original complaint.

MPTEXT2: Text message from Mr. Parada commending me and also essentially admitting that he had sent flowers anonymously even after I had asked that he not do so again.

MPTEXT3: Text message from Mr. Parada commending my work ethic and dedication to the Borough which directly contradicts his recent false accusations that my work was subpar.

MPTEXT4: Text message from Mr. Parada wherein he emphasizes how valuable I am to his team at the Borough which directly contradicts his recent false accusations that my work was subpar.

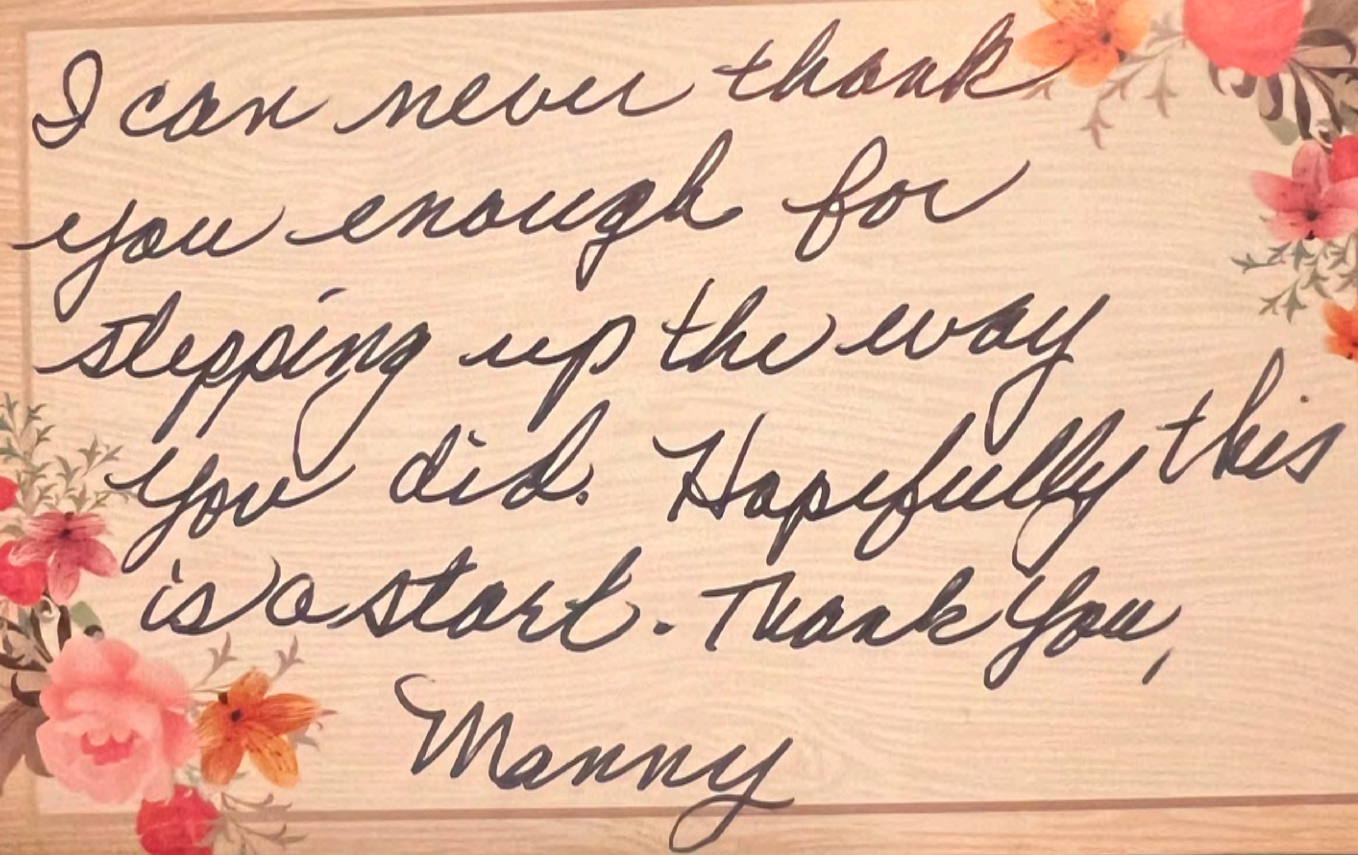
MPTEXT5: Text messages (2 excerpts) from Mr. Parada regarding a Borough Official with whom he had "issues with." This communication needs no explanation as the matter speaks for itself but is being provided here to demonstrate the retaliatory behaviour in which Mr. Parada routinely engages when a person becomes adversarial to him. By way of further explanation the picture in the middle of Mr. Parada's two texts is a GIF which I had sent as a reply to express my shock at his vulgar commentary.

I am copying the investigator, Shant Zakarian, so that he may proceed accordingly with these written communications as well.

Kindly forward this correspondence to the newly appointed Solicitor for the Borough of Stone Harbor, and to whomever is acting as the Affirmative Action Officer as well.

Thank you.

Megan Brown



I can never thank
you enough for
stepping up the way
you did. Hopefully this
is a start. Thank You,
Manny

My marriage is falling apart. I have a Mayor who hates me. My mom is telling me to run away from there. And I'm busting my ass working 15-16 hours a day. For what? This is not what I moved here for. I really wanted semi-retirement. Cushy PW job to pay the bills and spend the rest of my time on the beach. My life is falling apart in just 4 months...

Yea that's too- much for one person all at once. It's not worth it. And no one would fault you for walking away.

Sure. I was getting shot at in Wilmington. But I learned to work around that. This shit is unreal. I'm getting some really bad thoughts tonight. Really bad

It is unreal and it's so stupid and blown out of proportion. I was so embarrassed sitting up there

I'm sorry you had to experience that. This is unfair to you too. I don't know what happened there,

You are an incredible woman! You deserve so much more! Happy birthday!

Thank you so much. It really means a lot to me. Still trying to figure out who the second set of flowers are from 🤔😄

Mums the word...😂😂😂

HA
HA

That had your name all over it- just sayin

I would've signed it "#BestMeganEver"! 😂

HA
HA

Your dedication to this Borough does not have an equal. I am still stunned at what you've done and accomplished this weekend and really all month long. I can never thank you enough. You are an amazing person and an inspirational employee. You make me strive to be better, just to keep up with you! Truly, you are amazing!

Thu, Aug 10 at 10:33 AM

Good morning. I'm trying to give you room these days so I haven't bugged you. But please know you are sorely missed here! You are a tremendously important and valuable part of this team and we all love and respect you. I hope you are doing better. There has been an outpouring of concern for you, directed at me.

Tue, Aug 1 at 7:59 PM

I got friggin stuck with her 😡

I wouldn't piss on that cunt if she was on fire. My urine is better than her



I am seriously pissed off right now. I'm pretty sure I'm taking the rest of the week off and re-evaluate my life here. I'm also questioning my sobriety right now.

I'll let you know in the morning, but you can count on me being out

Wed, May 17 at 6:41 PM

Here's what you can use for next time 😊 🕷️

[https://www.amazon.com/CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?](https://www.amazon.com/CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?tag=pestdude-20&ref_=as_li_ss_tl)

[tag=pestdude-20&ref_ =as li ss_](https://www.amazon.com/CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?tag=pestdude-20&ref_=as_li_ss_tl)

[tl \(https://www.amazon.com/](https://www.amazon.com/CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?tag=pestdude-20&ref_=as_li_ss_tl)

[CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?](https://www.amazon.com/CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?tag=pestdude-20&ref_=as_li_ss_tl)

[tag=pestdude-20&ref_ =as li ss_](https://www.amazon.com/CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?tag=pestdude-20&ref_=as_li_ss_tl)
[tl\)](https://www.amazon.com/CB-80-Contact-Aerosol-17-Can/dp/B00474SOVC?tag=pestdude-20&ref_=as_li_ss_tl)

I definitely needed that last night



thank you for the tip!!!

Sun, Jun 25 at 10:29 AM

Hi Megan...this is a covert message so shhhh 🙊 Manny can't know I sent you this, please. I know you all have been trying to figure out Manny's birthday. I need to tell you that as easy-going as he may seem, he REALLY does NOT like celebrating his birthday or having attention drawn to it AT ALL. I'm 100% serious. The best thing you could do is pretend he doesn't have a birthday. I tried to do a very small surprise party for him a few years back, and he pretended to enjoy it while other people were around, but once it was over and we were alone he let me know how uncomfortable he'd been the whole time and how angry he was at me for doing it. I just thought you should know. Again, please don't tell him that I told you. He'd be upset about that too. Thanks.

EXHIBIT 3

From: Megan Brown <brownm@shnj.org>
Sent: Monday, March 4, 2024 10:26 PM
To: Judith Davies-Dunhour <DaviesJ@shnj.org>; Frank Dallahan <DallahanF@shnj.org>; Jennifer Gensemer <GensemerJ@shnj.org>; Bunny Parzych <ParzychB@shnj.org>; Robin Casper <casperr@shnj.org>; Victor Foschini <foschiniv@shnj.org>; Tim Carney <carneyt@shnj.org>
Cc: Emily Dillon <DillonE@shnj.org>
Subject: RE: Continued Hostile Work Environment/ Retaliation complaint

Dear Mayor Davies-Dunhour and Councilmembers,

On Jan 18, 2024, a Stone Harbor Borough job opening which solicited applications from any current Borough Employees for the position of Technical Assistant to the Construction Official (TACO) was posted on the Clerks' Bulletin Board and emailed to all employees. I was very happy to learn of this job posting because I already had all of the required credentials for the same, I know the job very well since my mother has served in this position for 24 years, and above all else it would mean that my immediate supervisor would no longer be Mr. Parada to whom my current position now normally reports. On January 25, 2024, I submitted my application for the TACO position.

On February 1, 2024, I received an email that was forwarded to me by Mr. Poudrier, the SH Construction/Zoning Official, and originating from Mr. Parada wherein Mr. Parada stated the job posting for the TACO position was incorrect, and changes were being made to the requirements for the same. Specifically, Mr. Parada stated in pertinent part as follows:

"Hi Ray - A&F determined that all new hires within the Borough should be 40 hours. I noticed the posting for the Technical Assistant in the Construction Office is listed as 7.5 hours with an hour lunch, so I assume that is 32.5 hours a week.

It should be revised to a 40-hour work week. Given the type of work in your office, I would suggest a 7am to 3:30pm workday with a half hour of lunch"

In that same email, Mr. Poudrier asks me to confirm whether I would still be interested in the position given these changes. I responded immediately that I would still like to move forward with the application/interview process for the TACO position.

On February 5, 2024, Mr. Poudrier notified me via email that the posting for the TACO position was being withdrawn until further notice.

On February 22, 2024, I received an email from Mr. Poudrier stating that the TACO position will be internally re-posted to all Borough employees for a period of 2 weeks, prior to being posted in the local paper if no internal transfer employees are found. The changes made to job posting were consistent with the new terms stated by Mr. Parada in the email which I received on January 29, 2024, and as set forth herein above.

On February 23, 2024, I emailed Mr. Poudrier indicating that I would still like to be considered for the TACO position.

On February 28, 2024, I was informed by Mr. Poudrier that the search for the TACO position was being suspended at the direction of Council Members.

Because of my interactions with Mr. Parada as an employee over the past year Mr. Parada is very well aware that I am a single mother of two school age children and that any workday that begins at 7am and which would also require a 40-hour work week would be extraordinarily difficult for me to manage and any attempt do so would create an extraordinary amount of additional stress in my life. In the January 29, 2024, email referenced herein Mr. Parada specifically mentions that the TACO position workday should start at 7:00 AM in order to retaliate against me and make it extremely difficult for me to even consider

applying for such a position. Additionally, the Administration and Finance Committee (A&F), comprised of Council Members Jennifer Gensemer, Chair, Bernadette Parzych and Frank Dallahan also participated in this retaliation by conspiring with and authorizing Mr. Parada to engage in such conduct. I believe that both the A&F Committee and Mr. Parada thought I would not even apply for the TACO position because the revised requirements would be too difficult for me to handle, not only from a scheduling and financial standpoint but also from a mental and stress management standpoint. Fortunately, with the help and support of good friends and family I was able to figure out a way that I could handle these new work parameters which is why I applied for the TACO position again on February 23, 2024. Both Mr. Parada and the A&F Committee retaliated against me a second time when they once again withdrew the posting for the TACO position on February 28, 2024. I believe that Mr. Parada and the A&F Committee are conspiring to prevent me from applying for the TACO position and furthermore prevent me from being hired into the TACO position.

The retaliatory actions by both Mr. Parada and the members of the A&F Committee, as set forth herein, are outrageous, unconscionable, and have caused significant harm to me both physically and mentally. Their actions are a calculated assault on me both personally and professionally and are a direct result of A.) my unwillingness to respond favorably to Mr. Parada's unwelcome advances, as set forth in my prior complaints of January 31, 2024, February 7, 2024, and February 9, 2024, regarding the same, B.) my cooperation in a Borough led investigation into Mr. Parada's harassment of me and his creation of a hostile work environment as reported by a third-party Borough employee, and C.) my initiation of a formal complaint, on my own behalf, of harassment, hostile work environment and retaliation against Mr. Parada as set forth in my prior email correspondences of January 31, 2024, February 7, 2024, and February 9, 2024.

Kindly accept this email correspondence as a separate formal complaint of Continued Hostile Work Environment and new instances of Retaliation against me by Mr. Parada and the Stone Harbor Administration and Finance Committee, Jennifer Gensemer, Chair, Bernadette Parzych and Frank Dallahan, both in their individual capacities and collectively. I request that a thorough investigation into the above matters be conducted at once.

Please also consider this correspondence as a formal request for any information pertaining to actions taken thus far as a result of my previous complaints as set forth in my prior email correspondences of January 31, 2024, February 7, 2024, and February 9, 2024.

Please forward this to the Borough Solicitor as well as the Affirmative Action Officer.

Respectfully,

Megan Brown

EXHIBIT 4

Date: March 4, 2024

To: Peter Webster, HR Director

From: Concerned Employees of Stone Harbor Borough Hall (names listed below)

Subject: Request for Meeting to Address Concerns About Work Environment

Dear Mr. Webster,

We, the undersigned employees of Borough Hall, are writing to express our deep concern about the current state of our work environment. We believe that the environment is currently creating significant difficulties in our ability to perform our jobs effectively and safely.

Unfortunately, morale at Borough Hall appears to be at an all-time low. In order to address this situation and find solutions, we respectfully request a meeting to discuss our concerns with **ONLY** the following key individuals:

- Mayor, Judith Davies-Dunhour
- Council President, Frank Dallahan
- Borough Solicitor, Anthony Bocchi
- Chief of Police, Tom Schutta
- HR Director, Peter Webster

We believe these individuals are crucial to our discussion, as they hold key positions of authority and influence in addressing the issues we will raise.

During this meeting, we would like to voice our concerns in detail about the following areas, but are not limited to:

- **Physical safety concerns**
- **Threats to Emotional well-being**
- **Potential risks to borough physical and intellectual property**
- **Cybersecurity**

We believe that open and honest communication is essential to addressing these issues and creating a more positive and productive work environment for all Borough Hall employees. We expect the meeting to be scheduled as soon as possible.

Respectfully,

Jenny Olson
Kate McManis
Margaret Plunk
Meghan Deeks
Suzanne M. Pe

Megan Brown
Jen King
William Hawkins

Civil Case Information Statement

Case Details: CAPE MAY | Civil Part Docket# L-000148-24

Case Caption: BROWN MEGAN VS BOROUGH OF STONE HAR BOR

Case Initiation Date: 04/12/2024

Attorney Name: SCOTT MICHAEL POLLINS

Firm Name: POLLINS LAW

Address: 303 W. LANCASTER AVE STE 1C WAYNE PA 19087

Phone: 6108969909

Name of Party: PLAINTIFF : Brown, Megan

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Megan Brown? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO **Medical Debt Claim?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

04/12/2024
Dated

/s/ SCOTT MICHAEL POLLINS
Signed

