

**VERMONT HUMAN RIGHTS COMMISSION**

[REDACTED]

v.

HRC Case No. PA23-0005

Woodstock Union High School & Middle School  
and Woodstock Central Supervisory Union

**CONCILIATION AGREEMENT**

This Conciliation Agreement constitutes closure with settlement of the public accommodations discrimination complaint filed with the Vermont Human Rights Commission (VHRC), HRC Case No. PA-23-0005 in which [REDACTED] (“Complainant”) alleges Respondents discriminated against [REDACTED] based on race, color and national origin. The Commission made a determination on January 25, 2024, that there were reasonable grounds to believe that the Respondents discriminated against [REDACTED] in violation of Vermont’s Fair Housing and Public Accommodations Act.

The VHRC accepts this Conciliation Agreement as a final resolution.

Complainant and Respondents agree, as evidenced by their signatures below, to the following terms of settlement, in lieu of litigation by the VHRC:

- I. Respondents agree to:
  - A. Pay Complainant the sum of One Hundred Seventy-Five Thousand Dollars on the following schedule: \$100,000 before July 1, 2024; an additional \$25,000 before July 1, 2025; an additional \$25,000 before July 1, 2026; an additional \$25,000 before July 1, 2027.

- B. Training. The Respondents and HRC will confer and agree upon a schedule for training for all staff to be provided by HRC related to implementing HHB obligations under Title 16, Vt. Stat. Ann.
- 2. Complainant agrees to execute a full release of all claims against Respondents pertaining to the allegations made in the VHRC Complaint. Respondent denies any wrongdoing and does not admit liability.
- 3. This Agreement is in full settlement of the complaint against the above-named Respondents, VHRC Case No. PA23-0005 and the VHRC will take no further action other than to enforce the terms of this agreement.
- 4. The effective date of this Agreement is the date of the last signature of either party on this Agreement. This Agreement also is subject to approval by the Mountain Views Supervisory Union Board.
- 5. This Agreement may be executed in counterparts, which together shall constitute one agreement. This Agreement is fully enforceable with signatures provided by electronic transmission.
- 6. The provisions of this Settlement Agreement adequately address the public interest, and this Agreement shall be made a public document. In response to a public records request, the HRC may redact the name of the Complainant.

DocuSigned by:  
[Redacted Signature]  
24E206D266BE480...

[Redacted Name], Complainant

Date: May 14, 2024

DocuSigned by:  
*Sherry Sousa*  
F0F801A0A57647F...

Woodstock Central Supervisory Union  
And Woodstock Union High School & Middle School,  
Respondents

Date: May 14, 2024

**The Human Rights Commission will take no further action regarding VHRC Case No. except VHRC may take steps available under the law to enforce the terms of this Agreement in the event of a breach by the Respondents.**

Dated at Montpelier, Vermont, this 23rd day of May, 2024.

By: VERMONT HUMAN RIGHTS COMMISSION

/s/ Kevin Christie  
Kevin Christie, Chair

/s/ Nathan Besio  
Nathan Besio

absent  
Dawn Ellis

/s/ Joan Berwick Nagy  
Joan Berwick Nagy

absent  
Bruce Wilson