

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

In The Matter of the Complaint of:

NEW YORK CITY COMMISSION ON HUMAN
RIGHTS,

VERIFIED COMPLAINT

Complainant,

Complaint No.: M-X-6-25-145683

- against -

GOLDEN KRUST and BISHOP HARDING,

Respondents.

NATURE OF THE ACTION

The New York City Commission on Human Rights (“Commission”) brings this action against Respondents Golden Krust and Bishop Harding (“Respondents”) for a violation of § 8-124 of the Administrative Code of the City of New York (“NYCHRL” or “Code”).

The Commission alleges as follows:

JURISDICTION AND VENUE

1. The Commission initiates this Complaint through its Law Enforcement Bureau (“LEB”) pursuant to § 8-109(c) of the NYCHRL. The effects of the alleged unlawful policies and practices described in this Complaint occurred in the City of New York.

PARTIES

2. LEB's address is 22 Reade Street, Floor 3, New York, NY 10007.

3. Respondent Golden Krust’s address for service of process is 1936 Ralph Avenue, Brooklyn, NY 11234.

4. Respondent Bishop Harding is the owner of Respondent Golden Krust. Respondent Harding's address for service of process is c/o Golden Krust, 1936 Ralph Avenue, Brooklyn, NY 11234.

FACTS

5. Respondents Golden Krust and Harding executed a Conciliation Agreement with Deborah Braham and LEB for Complaint No. M-E-DOS-17-04948-E/M-E-SDO-15-1031156-E (“Agreement”). The Agreement was signed by Respondents Golden Krust and Harding on January 10, 2024, was signed by Ms. Braham on January 11, 2024, and was signed by LEB and so-ordered by the Commissioner of the Commission on January 18, 2024. Through the Agreement, Respondents agreed, in substance, to: (1) send employees of Golden Krust to antidiscrimination training, (2) display postings and notices, (3) create and implement a NYCHRL policy, (4) work with a community shelter, advocacy group, or non-profit organization (“Community Partner”) to perform targeted outreach and hiring of unhoused women to open positions at Golden Krust, and (5) pay Ms. Braham the gross total settlement sum of sixty thousand dollars (\$60,000.00) (“Settlement Sum”), comprised of \$30,000 as payment for alleged emotional distress and \$30,000 as payment of backpay.

6. Upon signing the Agreement, Respondents failed to make the initial backpay payment of \$15,000.

7. Over the next four months, Respondents failed to make monthly backpay installment payments of \$3,750 each.

8. In or around April 2024, it became apparent that Respondents had failed to comply with Paragraph 9 of the Agreement (“Community engagement”) by failing to submit to LEB for review and approval a proposed outreach and hiring plan for recruitment, interviewing and hiring of unhoused women for open positions at Golden Krust (“Plan”) in collaboration with a Community Partner.

9. Despite numerous attempts by LEB to elicit payment of the backpay portion of the Settlement Sum in the total amount of \$30,000 and submission of the Plan under Paragraph 9

of the Agreement, Respondents have, to date, failed to comply with these terms of the Agreement.

CHARGE I

Violations of Commission Orders pursuant to § 8-124

10. LEB incorporates and realleges paragraphs 1 through 9 of the Complaint as though fully set forth herein.

11. LEB charges that Respondents have, by failing to comply with the Agreement so ordered by the Commissioner, committed one or more violations of Commission orders under § 8-124 of the Code and are liable for a civil penalty of not more than \$50,000 and an additional civil penalty of not more than \$100 per day for each day that the violation continues.

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Katherine Carroll, being duly sworn, deposes and says: that I am the Deputy Commissioner of the Law Enforcement Bureau of the New York City Commission on Human Rights, the Complainant herein; I have read the foregoing Complaint and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believe the same to be true.

Date: October 4, 2024


Katherine Carroll

Subscribed and sworn to before me
This 4th day of October, 2024.


(Signature of Notary Public)



