

Thaddeus P. Mikulski, Jr. (7141983)
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Attorney for Plaintiff, Renee Doersch

Renee L. Doersch

Plaintiff

vs.

**State of New Jersey, Legislative
Services Commission, Office of
Legislative Services**

Defendant

RECEIVED

JAN 30 2017

MERCER VICINAGE
FINANCE DIVISION

() Cash (X) Check
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Fee Paid & Entered

JAN 31 2017

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Amount \$ _____ 250 -
Batch # _____ 494
Sue Regan
Deputy Clerk of Superior Court

**Superior Court of New Jersey
Mercer County - Law Division**

Civil Action

Docket No: MER. L. 213-17

**Complaint
and Jury Demand**

FILED

JAN 30 2017

SUPREME COURT OF NJ
MERCER VICINAGE
CIVIL DIVISION

Plaintiff, Renee L. Doersch, by way of Complaint against Defendants,
avers:

1. Plaintiff, Renee L. Doersch, is an individual residing at 15 Springhill Lane, Burlington, New Jersey 08016.
2. Defendant, Office of Legislative Services, is an agency of the Legislative Branch of the State Government of New Jersey that is governed by the New Jersey Legislative Services Commission.
3. On February 7, 2005, Plaintiff, Renee Doersch, began employment as a secretary with the Office of Legislative Services.
4. In 2009, Plaintiff became a follower of the Hindu religion. Thereafter,

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SUPERIOR COURT OF NJ
MERCER VICINAGE
CIVIL DIVISION

ENTERED

her coworkers and her supervisor, Veronica Lupo, at the Office of Legislative Services learned that she was a follower of Hinduism, chiefly through conversations related to the religious basis for her vegetarianism.

5. On a date in either 2012 or 2013, her supervisor, Veronica Lupo, accused Plaintiff of "putting curses" on herself and her husband, who had died in 2010. During this conversation Veronica Lupo accused Plaintiff of being responsible for her husband's death through the use of the curses of Indian deities. Plaintiff considered these statements to be discriminatory and the product of an irrational mind. Plaintiff complained to the Director of the Office of Legislative Services, Marvin Jiggetts, and its Human Resources Director, Eugene E. Howard, Jr., who took no action concerning Plaintiff's complaint about the inappropriate and discriminatory comments of Veronica Lupo.

6. In October, 2015, Plaintiff brought a statue of Lord Shiva, a deity of the Hindu religion, to work and placed it on her desk. After observing the Lord Shiva statue, Plaintiff's supervisor, Veronica Lupo, told Plaintiff that the statue was putting curses on her. Veronica Lupo complained about the presence of the Lord Shiva statue on the Plaintiff's desk to her superiors. Shortly thereafter, Plaintiff was confronted and challenged about the Lord Shiva statue in a public meeting by Eugene E. Howard, Jr., Director of Human Resources, Maureen McMahan, Assistant Director, Mary Ann Hutchinson, Coordinator of Secretarial Services and Section Chief, Robert Levin.

7. During the meeting Eugene E. Howard, Jr. printed out a "google search" which included, as Plaintiff recalls, the words "Indian curse gods". The search documents revealed the identity of multiple Hindu deities, including Lord Shiva. Plaintiff told Eugene E. Howard, Jr. that she knew nothing about his list of alleged "Indian curse gods" and informed him that the statute on her desk was that of Lord Shiva, who to many Hindu believers is a god similar to the Christian Jesus. Plaintiff tried to explain the trinity deity of the Hindu religion consisting of Brahma, Vishnu and Shiva. However, Eugene E. Howard, Jr. repeatedly verbally attacked Plaintiff by telling her that she was putting curses on her supervisor. Plaintiff responded that she had no knowledge of Hindu curses and she did not believe in curses. She told Eugene E. Howard, Jr. that his statements were outrageous.

8. Despite her attempts to explain Hindu beliefs to him, Eugene E. Howard, Jr. repeatedly attacked her in the meeting. He then ordered Plaintiff to take the Lord Shiva statue home and to never bring it into the office again. Plaintiff responded by telling him that if she was not allowed to have a Lord Shiva statue on her desk then she did not want to see figurines of Jesus or Mary or any other religious items on other employees' desks. Eugene E. Howard, Jr. responded by saying that Plaintiff was putting curses on her supervisor and he made the outrageous statement that disciplinary action would be taken against her for her expression of her religious beliefs.