

FEB 20 2013

Settlement Agreement


This Settlement Agreement ("Agreement") is entered into by and between Richard Halasz ("Complainant") and the Wisconsin Hispanic Scholarship Foundation d/b/a Mexican Fiesta ("Mexican Fiesta" or "Respondent").

The Agreement is a result of alleged discriminatory practices said to have occurred on or around August 26, 2012. The Complainant, through his attorney, filed a complaint with the Wisconsin Department of Workforce Development Equal Rights Division. The Complainant alleges that he was discriminated against by Mexican Fiesta under Wis. Stat. 106.52(3)(a), specifically, that Mexican Fiesta provided preferential treatment in providing services or facilities in a place of public accommodation or amusement based on creed.


In seeking to mutually resolve all claims, the Complainant and Respondent agree to the following terms.

1. The Complainant agrees to waive all rights to bring any further administrative or civil action against Respondent under Wis. Stat. § 106.52 concerning the August 26, 2012 occurrence. This Agreement is in resolution of all of Complainant's claims and causes of action, and does not constitute an admission of liability by the Respondent.
2. The Respondent agrees that it will eliminate its promotion that offers reduced festival admission prices to those who attend religious services. The Respondent agrees that future Mexican Fiesta promotions will not be timed to coincide with times of entry or exit of the annual Mass that is held on the Henry Maier Festival Park grounds.
3. The Respondent agrees to issue a letter of apology to the Complainant.
4. The Respondent agrees to refund to the Complainant his out-of-pocket expenses, which are \$8.
5. The Complainant agrees to waive recovery of all attorneys' fees as a condition of settlement.
6. Based upon the settlement, the Complainant agrees to dismiss and/or withdraw ERD Case No. CR201203231.

I have read the foregoing Agreement, and accept and agree to the provisions contained therein.


Antonio Guajardo (Authorized Agent)
Respondent

2.7.13
Date


Richard Halasz
Complainant

1.28.13
Date