

EXHIBIT A

List of Aggrieved Individuals

Julie Cordova

Rachel Cordova

Tina Reyes

Barbara Chaparro

Maria Borquez

Danielle Chavez

Rebecca Cisneros

Esther Giron

Crisanta Guerra

Alisha Moore

Devon Montoya

Lilia Castillo de Paez

Darlene Sisneros

EXHIBIT B (Letter of Regret)

RE: Smokin' Spuds, Inc., d/b/a MountainKing Potatoes, and Farming Technology, Inc., Civil Action No. 1:14-cv-02206-REB-KMT (D.Colorado),

Dear _____ :

On behalf of Smokin' Spuds, Inc., d/b/a MountainKing Potatoes, and Farming Technology, Inc., I wish to express my sincere regret that you found your experience, while employed at the MountainKing plant in Monte Vista, to be offensive and hostile.

Sincerely,

Smokin' Spuds, Inc., d/b/a MountainKing Potatoes,
and Farming Technology, Inc.

EXHIBIT C

NOTICE

The following notice is being posted pursuant to the terms of a Consent Decree reached between the Parties in EEOC v. Smokin' Spuds, Inc., d/b/a MountainKing Potatoes, and Farming Technology, Inc., (“MountainKing”) filed in the United States District Court for the District of Colorado, Civil Action No. 1:14-cv-02206-REB-KMT (D. Colorado).

Pursuant to Title VII, it is unlawful for an employer to discriminate based upon the sex of an applicant or employee. Further, it is unlawful for any employer to retaliate against an employee because he or she has requested reasonable accommodation for disability or religion, opposed discriminatory employment practices, or because he or she has filed a charge of discrimination with any municipal, state or federal equal employment opportunity agency, or because he or she has participated in an investigation of a charge of discrimination.

As part of an agreement between the parties in the lawsuit, the U.S. District Court has Ordered:

- Defendants are prohibited from engaging in any form of sexual harassment or sex discrimination;
- Defendants are prohibited from retaliating against any employee who complains, testifies truthfully regarding, or otherwise opposes unlawful sexual harassment or sex discrimination;
- Defendants must maintain records of all complaints of sexual harassment and sex discrimination and any punitive employment actions or disciplines thereafter regarding such complainant(s);
- A Monitor has been appointed to ensure that Defendants comply with the Court's Order forbidding future sexual harassment or sex discrimination;
- Defendants must permit the Monitor to meet with Defendants' employees in private every six months so that employees can freely report whether they have been subject to or have witnessed other employees subject to sexual harassment, a hostile work environment, or discrimination based on sex;
- Defendants must submit regular reports to the Monitor and to the Equal Employment Opportunity Commission;
- Defendants are required to provide Equal Employment Opportunity training to all current nonsupervisory employees, and provide training within 30 days of hire to all new employees, 30 minutes of which must include information about sexual harassment and hostile work environment;
- Defendants are required to provide Equal Employment Opportunity training to managers and supervisors at least twice a year.

Please know that Defendants will not tolerate any form of sexual harassment or sex

discrimination, including but not limited to:

- Unwanted sexual advances;
- Unwanted touching, groping, or other physical or verbal conduct of a sexual nature;
- Sexual comments or innuendo;
- Requests for sexual favors;
- Any demeaning, intimidating, threatening, or hurtful comments or behavior that shows hostility toward individuals because of their sex;
- Treating female employees less favorably than male employees;

If you personally experience or witness any of the above types of behavior or any other form of sexual harassment, hostility, or disparate treatment, you are encouraged to contact one of the following persons, all of whom are equipped to communicate with you in either English and Spanish or can refer you to an individual who can help you who is able to communicate in your preferred language:

- _____, Monitor,

Denver, CO _____
(303) ____ - ____
- Equal Employment Opportunity Commission
303 E. 17th Avenue, Suite 410
Denver, CO 80203
(303) 866-1317

In compliance with federal law, no official at MountainKing will retaliate against an employee who makes an internal complaint of discrimination or who contacts the EEOC or its state counterpart.

This Notice shall remain posted for the term of three (3) years.

Smokin' Spuds, Inc., d/b/a MountainKing Potatoes, and Farming Technology, Inc. d/b/a Mountain King Potatoes

By: _____

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No: 1:14-cv-02206-REB-KMT

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,

Plaintiff,

RACHEL CORDOVA, JULIE CORDOVA and TINA REYES,

Plaintiff-Intervenors,

v.

SMOKIN' SPUDS, INC., d/b/a MOUNTAINKING POTATOES

and,

FARMING TECHNOLOGY, INC.,

Defendants.

SATISFACTION OF JUDGMENT

Judgment was rendered in favor of the above-named Equal Employment Opportunity Commission (“Commission”) and against the above-named Smokin Spuds, Inc. d/b/a MountainKing Potatoes and Farming Technology, Inc. in the above-entitled action, on the ____ day of _____, 2015, in the sum of \$_____. The judgment was provided for in Paragraph 22 of the Consent Decree dated _____. The Commission acknowledges payment of said monetary judgment and desires to release the monetary portions of the judgment and hereby fully and completely satisfy the same.

All provisions of the Consent Decree other than the judgment provided for in Paragraph 22 of the Consent Decree remain in full force and effect for the term set forth in the Consent Decree.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

By: _____
Printed Name: _____
Title: _____

Subscribed and sworn to me by _____ above-named, this _____
day of _____, _____.

Given under by hand and notarial seal.

My commission expires:

Notary Public