









June 8, 2023

Enforcement Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Response to Broadcast EEO Request

April 24, 2023

WVHK-FM, Christiansburg, VA

Monticello Media, LLC

Facility ID # 69744

## **EEO Enforcement Staff:**

On behalf of Monticello Media LLC, licensee of the above-mentioned broadcast station, and the commonly owned stations in the Blacksburg, VA station employment unit, I submit the response to your letter of April 24, 2023 concerning compliance with the Commission's EEO rules. In accordance with your request, I include documentation responsive to your inquiry.

Paul M. Johnson

Vice President/General Manager

paul@newriverradio.com

## **EEO Audit Response for WVHK-FM**

**Question 1**, the licensee for WVHK-FM, Christiansburg, VA is part of a station employment unit based in Blacksburg, VA which also includes WBRW-FM, Blacksburg VA (Facility ID 5795), WPSK-FM, Pulaski VA (Facility ID 48621), WRAD AM, Radford VA (Facility ID 73919), and WRAD FM, Radford VA (Facility ID 73918).

Monticello Media LLC also operates stations in Charlottesville, VA, but they are not within the same market and are not operated under the same Unit.

Question 2, the Unit has more than five full-time employees as the term is defined by section 73.2080 (e) (1).

Question 2(b) (i), a copy of the Unit's two most recent EEO public file reports as described in section 73.2080 (c) (6) are appended as Attachment A. The Unit filed an amended EEO report for 2022-2023 after a discrepancy was discovered in the original. An explanation is included in that amended report.

Question 2 (b) (iii), the date of each full-time hire is listed below (b) (iv), and in the Unit's most recent EEO public file reports appended in Attachment A. Dated copies of advertisements, bulletins, letters, e-mails, and other communication announcing those positions are appended as Attachment B.

Question 2 (b) (iv), the total number of interviewees for each full-time vacancy and the referral source for each during the period covered in the above noted EEO reports are listed here, and appended in Unit EEO report as Attachment A. In EEO reports previous to the two requested in this audit, it was discovered that the local chapter of the NAACP had been receiving vacancy notifications. Having gone

through management and EEO leadership changes during and after Covid, the Unit cannot verify whether the NAACP did or did not request to be removed from notification. The station General Manager reached out to the chapter to see if they had cancelled their request for notification and would like to resume receiving them. No response has been received, but the Unit will continue attempts.

Position Title	Total No. Interviewees for the Vacancy	Recruitment Source of Hiree	Recruitment Sources Utilized (see attached list of sources)
Account Executive Date of hire: 6/6/2022	5	4	1, 2, 3, 4
General Manager Date of hire: 6/13/2022	1	4	1, 4, 5, 6
Account Executive Date of hire: 9/2/2022	6	1	1, 3, 4
Account Executive Date of hire: 1/12/2023	4	1	1, 2, 3, 7

- 1. Indeed.com, 6433 Champion Grandview Way, Austin, TX 78750
- 2. Radio Recruitment, Paul M. Johnson, 7080 Lee Highway, Radford, VA, 540-731-6001
- 3. Station Websites: 1053thebear.com, 107countrypsk.com, wradradio.com, hot100nrv.com
- 4. Employee Referral
- 5. All Access, Joel Denver, allaccess.com
- 6. Virginia Association of Broadcasters, vabonline.com
- 7. Linked In, 1000 West Maude Ave, Sunnyvale, CA 94943

Question 2 (b) (v), documentation of the Unit's performance of the recruitment initiatives during the above-noted EEO reports are appended in Attachment C, including station personnel involved. The Unit employs a total of nine (9) full-time employees in a market with a population of less than 250,000. Accordingly, the Unit is required to perform at least two points of recruitment initiatives during a two-year period. The activities themselves are listed here:

Activity Classification*	Type of Activity	Brief Description
1	Participation in Job Fair	Station Sales Manager attended the Pulaski Chamber of Commerce Job Fair on 8/12/2021.
4	Radford Chamber of Commerce meeting	Station General Manager was guest speaker at Business over Breakfast. GM spoke and answered questions concerning community initiatives, programming, and employment opportunities. March 1, 2023
8	Training Program	Account Executive participated in P1 Learning Program sponsored by the VA Association of Broadcasters. This 7-week program provided deep sales and marketing training.
10	Educational Institutions	The Unit stations have a relationship with Virginia Tech's Sports, Media, and Analytics program. In the months of August, September, October, November, and December of 2022, and January, February, and March of 2023, 14 different students participated in real world sports and sports related broadcasts airing on several different unit stations.
14	HR and EEO Training	Station Manager, Sales Manager, and Operations Manager reviewed One Digital Federal Compliance Guide. One Digital is the company's benefits coordinator, and they offer guidance and support with HR and EEO procedures and compliance. March 2023.

Question 2 (b) (vi), the licensee affirms that it is not aware of any pending or resolved discrimination complaints during the relevant period.

Question 2 (b) (vii), in accordance with section 73.2080 (b), Monticello Media LLC provides strict EEO guidelines, including hiring practices and anti-discrimination specifics in the company handbook, which is shared and signed by each full-time employee. A copy of those guidelines is appended in Attachment D. At the Unit Management level, the importance of broad outreach and record keeping of FCC EEO compliance is communicated through weekly management meetings. In addition, each Unit Manager has read the 2023 One Digital Federal Compliance Guide, appended in Attachment D. Oversight of EEO compliance was primarily the responsibility of Monticello Media Operations Manager until January, 2023. At that time, the Unit General Manager assumed those responsibilities. The Unit's

compliance efforts to afford equal opportunities are posted conspicuously in all written job descriptions, and at the conclusion of each broadcast recruitment announcement. Examples from job postings are appended in Attachment B.

Question 2 (b) (viii), the licensee affirms that the Unit understands the need for periodical analysis of its recruitment outreach and effectiveness by reviewing the productivity of the sources on its recruitment list, and the outcome of its initiatives. After each recruitment, Unit management evaluates and determines how effectively each source is reaching the communities of service, and what new sources may be available and more effective.

Question 2 (b) (ix), the Unit strives to comply with all federal, state, and local laws regarding pay, benefits, seniority practices, promotions, and selection techniques to ensure that the Unit provides equal opportunity and does not discriminate against employees or applicants. These are outlined in employee reviews and during the interview and hiring process. The Unit's employment practices are the ultimate responsibility of the Unit General Manager, working in conjunction with private counsel, The Virginia Association of Broadcasters, and the licensee. There are no union affiliations within the Unit.

Question 2 (b) x), none of the stations within the Unit are religious. Therefore, no employees are subject to any religious qualification.

Questions 3 and 4. There are no time brokerage agreements on any station within the Unit.

**Question 5.** The Facility ID for WVHK FM, name of company representative, and email address are found on the opening and closing pages of this document.

The accuracy and completeness of the response is certified by Unit General Manager, who completed the report with the general guidance of the Legal Firm, Brooks-Pierce, Raleigh, NC.

Paul M. Johnson

General Manager

WVHK FM (Facility ID 60744)

Monticello Media, LLC

Blacksburg, VA

paul@newriverradio.com

Attachments A, B, C and D to follow:

## WVHK FM (69744) 2023 EEO Audit

## ATTACHMENT A

**EEO Reports** 

June 1, 2021 to May 31, 2022

June 1, 2022 to May 31, 2023

**rage:** 1/5

# New River Radio Group (WBRW/WPSK/WRAD//WVHK) EEO PUBLIC FILE REPORT

June 1, 2021 - May 31, 2022

## I. VACANCY LIST

See Section II, the "Master Recruitment Source List" ("MRSL") for recruitment source data

Job Title	Recruitment Sources ("RS") Used to Fill Vacancy	RS Referring Hiree
NO JOB OPENINGS WERE POSTED AN	ND FILLED DURING THIS REPORTING	PERIOD.

**rage:** 2/3

# New River Radio Group (WBRW/WPSK/WRAD//WVHK) EEO PUBLIC FILE REPORT

June 1, 2021 - May 31, 2022

## II. MASTER RECRUITMENT SOURCE LIST ("MRSL")

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
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AS NOTED IN SECTION I, NO JOB OPENINGS WERE POSTED AND FILLED DURING THIS REPORTING PERIOD.

rage: 3/3

# New River Radio Group (WBRW/WPSK/WRAD//WVHK) EEO PUBLIC FILE REPORT

June 1, 2021 - May 31, 2022

## III. RECRUITMENT INITIATIVES

	Date	Type of Recruitment Initiative (Menu Selection)	Brief Description Of Activity	No. of Stations Participants	Participant Title
1	8/12/2021	Participation in Job Fairs	Attended the Pulaski Chamber of Commerce Job Fair	1	Sales Manager

## EEO PUBLIC FILE REPORT

## **FOR**

# WBRW FM, WPSK FM, WRAD FM, WRAD AM, WVHK FM Ammended

This EEO Public File Report June 1, 2022 to May 31, 2023

For this amended report, one Activity from Attachment 3 was deleted from the original report. It was a Job Fair that was cancelled by the organizer, but not deleted from our annual calendar, thus inadvertently included in our original Activity list. We have taken steps to prevent this from happening in the future. Additionally, a fuller description was added to the final Activity.

## **EEO Annual Public File Report**

## WBRW FM, WPSK FM, WRAD FM, WRAD AM, WVHK FM

The purpose of this EEO Public File Report is to comply with Section 73.2080 (c)(6) of the Federal Communications Commission's EEO Rule. This Report has been prepared on behalf of the Station(s) listed above. This Report will be placed in the online public inspection files of each station and posted on the stations' website(s).

The information contained in this Report covers the time period ending May 31, 2023.

Attachments 1 through 3 are intended to provide the information required by the FCC's EEO Rule. Attachments 1 and 2 contain the following information for each full-time vacancy:

- \* The recruitment source(s) used to fill each vacancy, identified by name, address, contact person and telephone number;
- \* The recruitment source that referred the hiree for each full-time vacancy;
- \* The total number of persons interviewed for each full-time vacancy; and,
- \* The total number of interviewees referred by each recruitment source used in connection with each vacancy.

Attachment 3 contains a list and brief description of outreach initiatives undertaken pursuant to the FCC's EEO Rule during the Reporting Period.

Questions concerning this Report should be directed to Paul Johnson at 540-731-6001, or paul@newriverradio.com

\* \* \* \* \* \*

## **ATTACHMENT 1**

## **FULL-TIME VACANCY INFORMATION**

Position Title	Total No. Interviewees for the Vacancy	Recruitment Source of Hiree	Recruitment Sources Utilized (see attached list of sources)
Account Executive	5	4	1, 2, 3, 4
Date of hire: 6/6/2022			
General Manager	1	4	1, 4, 5, 6
Date of hire: 6/13/2022			
Account Executive	6	1	1, 3, 4
Date of hire: 9/2/2022			
Account Executive	4	1	1, 2, 3, 7
Date of hire: 1/12/2023			

Total number of persons interviewed during the Reporting Period: 16

## ATTACHMENT 2 RECRUITMENT SOURCE INFORMATION

Recruitment Source (see attached list)	Total Number of Interviewees from Source*	Did Source Request Notice of Job Openings?
1	10	No
2	1	No
3	0	No
4	5	No
5	0	No
6	0	No
7	0	No

## RECRUITMENT SOURCES

#### Source

- 1. Indeed.com, 6433 Champion Grandview Way, Austin, TX 78750
- 2. Radio Recruitment, Paul M. Johnson, 7080 Lee Highway, Radford, VA, 540-731-6001
- 3. Station Websites: 1053thebear.com, 107countrypsk.com, wradradio.com, hot100nrv.com
- 4. Employee Referral
- 5. All Access, Joel Denver, allaccess.com
- 6. Virginia Association of Broadcasters, vabonline.com
- 7. Linked In, 1000 West Maude Ave, Sunnyvale, CA 94943

### **ATTACHMENT 3**

## **MENU OPTION ACTIVITIES**

The Stations have engaged in the following outreach activities during the period covered by this Report:

Activity Classification*	Type of Activity	Brief Description
4	Radford Chamber of Commerce meeting	Station General Manager was guest speaker at Business over Breakfast. GM spoke and answered questions concerning community initiatives, programming, and employment opportunities. March 1, 2023
8	Training Program	Account Executive participated in P1 Learning Program sponsored by the VA Association of Broadcasters. This 7-week program provided deep sales and marketing training.
10	Educational Institutions	The Unit stations have a relationship with Virginia Tech's Sports, Media, and Analytics program. In the months of August, September, October, November, and December of 2022, and January, February, and March of 2023, 14 different students participated in real world sports and sports related broadcasts airing on several different unit stations.
14	HR and EEO Training	Station Manager, Sales Manager, and Operations Manager reviewed One Digital Federal Compliance Guide. One Digital is the company's benefits coordinator, and they offer guidance and support with HR and EEO procedures and compliance. March 2023.
X		
X		

For this amended report, one activity was deleted from the original report. It was a Job Fair that was cancelled by the organizer, but not deleted from our annual calendar, thus inadvertently included in our original Activity list. We have taken steps to prevent this from happening in the future. Additionally, a fuller description was added to the final Activity.

<sup>\*</sup> For "Activity Classification", use "1" through "16" in accordance with attached list.

## **Menu Option Classifications**

- 1. Participation in at least four job fairs by station personnel who have substantial responsibility in making hiring decisions;
- 2. Hosting of at least one job fair;
- 3. Co-sponsoring of at least one job fair with organizations in the business and professional community whose membership includes substantial participation by women and minorities;
- 4. Participation in at least four events, including conventions, career days, workshops, and similar activities, sponsored by organizations representing groups present in the community interested in broadcast employment issues;
- 5. Establishment of an internship program designed to assist members of the community to acquire skills needed for broadcast employment;
- 6. Participation in job banks, Internet programs, and other programs designed to promote outreach generally (i.e., outreach that is not primarily directed to providing notification of specific job vacancies):
- 7. Participation in scholarship programs designed to assist students interested in pursuing a career in broadcasting;
- 8. Establishment of training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions;
- 9. Establishment of a mentoring program for station personnel;
- 10. Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting;
- 11. Sponsorship of at least two events in the community designed to inform and educate members of the public about employment opportunities in broadcasting;
- 12. Listing of each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation by women and minorities;
- 13. Provision of assistance to unaffiliated non-profit entities in the maintenance of web sites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting;
- 14. Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination;
- Provision of training to personnel of unaffiliated non-profit organizations interested in broadcast employment opportunities that would enable them to better refer job candidates for broadcast positions;
- 16. Participation in other activities designed by the station reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.

## WVHK FM (69744) 2023 EEO Audit

## **ATTACHMENT B**

Full Time Hires
Advertising Documents for Job Postings
Interview Information

Monticello Media DBA New River Radio Group 7080 Lee Hwy Radford, Virginia 24141

New River Radio Group

7080 Lee Hwy

Radford, VA 24141



Advertiser:

New River Radio Group

Order #:

4810363372806

Contract #:

402333

Date Entered: Last Modified: 03/03/2022

07/21/2022

Product:

AE Recruitment March

Salesperson: Billing Cycle: Greg Allen

Estimate #:

**Broadcast Standard** 

Order Date Range: 03/05/2022 through 03/27/2022 (4 weeks) Media Outlets: WBRW-FM, WPSK-FM, WRAD-AMFM, WVHK-FM

#### **On-Air Schedule**

#	<u>Dates</u>	Station	Time/Program	Len	Мо	Tu	Ne	Th	Fr	Sa	Su :	S/W	Rate	Qty	Total
1	03/05/22-03/06/22	WBRW-FM	06:00AM-12:00AM	60						-5	5	10	0.00	10	0.00
2	03/07/22-03/27/22	WBRW-FM	06:00AM-12:00AM	60	5	5	5	5	5	5	5	35	0.00	105	0.00
3	03/05/22-03/06/22	WPSK-FM	06:00AM-12:00AM	60						5	5	10	0.00	10	0.00
4	03/07/22-03/27/22	WPSK-FM	06:00AM-12:00AM	60	5	5	5	5	5	5	5	35	0.00	105	0.00
7	03/05/22-03/06/22	WRAD-AMFN	106:00AM-12:00AM	60						5	5	10	0.00	10	0.00
8	03/07/22-03/27/22	WRAD-AMFN	106:00AM-12:00AM	60	5	5	5	5	5	5	5	35	0.00	105	0.00
9	03/05/22-03/06/22	WVHK-FM	06:00AM-12:00AM	60						5	5	10	0.00	10	0.00
10	03/07/22-03/27/22	WVHK-FM	06:00AM-12:00AM	60	5	5	5	5	5	5	5	35	0.00	105	0.00
11	03/22/22-03/27/22	WVHK-FM	06:00AM-12:00AM	60		6	6	6	6	6	6	36	0.00	36	0.00

#### **On-Air Makegood Schedule**

	<u>Dates</u>	Station	Time/Program	Len	Мо	Tu V	Ve :	Th	Fr	Sa	Su S	/W	Rate	Otv	Total
			106:00AM-12:00AM	60		1						1	0.00	1	0.00
6	03/15/22-03/15/22	WRAD-AMFN	106:00AM-12:00AM	60		1						1	0.00	1	0.00

#### **Station Totals**

<u>Station</u>	On-Air Count	<b>Digital Count</b>	Web Count	Other Count	Gross Billing	Net Billing
WBRW-FM	115	0	0		\$0.00	\$0.00
WPSK-FM	115	0	0	0	\$0.00	\$0.00
WRAD-AMFM	115	0	0	0	\$0.00	\$0.00
WVHK-FM	151	0	0	0	\$0.00	\$0.00
Totals	496	Ó	Ő	0	\$0.00	\$0.00

**Total Charges:** \$0.00 **Total Net:** \$0.00

	Projected Billi	ing By Broadcast Standard Month	
Month	<u>Year</u>	Gross Billing	Net Billing
March	2022	\$0.00	\$0.00
Totals		\$0.00	\$0.00

Accepted for Monticello Media		Accepted for advertiser OR agency	as agent for the advertiser
Name	Title	Name	Title

New River Radio

**AE Recruitment:60** 

3/1/2022

Hey, are you a Hokies fan? Love VT sports? Then come join the team that's selling and marketing Virginia Tech sports at VT's flagship stations at New River Radio Group. They're looking for account executives to work for the voice of the New River Valley and Virginia Tech athletics. Selling and marketing Hokie Football, Men's and Women's Basketball, Baseball, and many other sports. With four stations in the Blacksburg market, and the latest search engine marketing and digital marketing products, you'll deliver all kinds of marketing solutions for Virginia Tech clients and sports fans. Give General Sales Manager, Greg Allen a call, or go to New River Radio dot com, and click on the Careers tab. That's new River Radio dot com, and wear your maroon and orange colors with pride. The New River Radio group, flagship stations for Virginia Tech sports, and the voice of the NRV. New River Radio Group is an Equal Opportunity Employer.



(540) 731-6000

## Careers

#### **ACCOUNT EXECUTIVE (OUTSIDE SALES)**

#### Position Available

Monticello Media WCHV, WCYK, WHTE, WKAV & WZGN

New River Radio Group WBRW, WPSK, WRAD & WVHK

Date: 03/05/2022

Monticello Media. Charlottesville VA, and New River Radio Blacksburg VA are looking to add to our talented team of Account Executives. We are seeking dynamic and results-driven individual who are focused on generating leads and revenue for our local client partners. At your disposal will be a full complement of resources including our premier radio stations (WCHV, WCYK, WHTE, WKAV, WZGN/Charlottesville or WBRW, WPSK, WRAD, WVHK/Blacksburg). a Creative Services Department, a Digital Services Department and a full staff dedicated to your success.

Job Title: Account Executive (Outside Sales).

Job description: Under the direction of the sales manager sell advertising within the assigned territory or accounts. Master and understand the value of digital & radio advertising along with strengths and position of the Monticello Media group of stations in the Charlottesville or The New River Radio Group of stations in Blacksburg. Focus selling digital products and local radio products

Job requirements: Excellent communicator with high level of verbal skills and written skills. Strong prospecting and business development proficiency. 2 years minimum successful outside sales preferred with a verifiable track record. The Account Executive must provide their own reliable transportation and maintain a valid Virginia driver's license. Strong working knowledge and understanding of the internet

Job duties and responsibilities include, but are not limited to:

- · You will provide valuable consultative services to small, mid-size and large firms and bring a concentrated focus on business development for both you and your clients
- · Prospect for new accounts and identify local businesses that have a need for our products and services.
- Set appointments, meet with clients, make sales presentations, and execute contracts.
- · Establish weekly/daily/monthly sales plan and then execute that plan

O Time here to cearch



This posting appeared on all of the Unit stations websites beginning on March 5, 2022. It remained up through all of the AE Recruiting Cycles in 2022 and 2023.



You cannot post new topics in this forum You cannot reply to topics in this forum You cannot edit your posts in this forum You cannot delete your posts in this forum You cannot post attachments in this forum

& Board Index

Digital Sales Manager	Lynchburg, VA	Full Time Sales	WSET-TV	4/7/2022
Country Station PD & Afternoon Drive	Harrisonburg, V	/A Full Time On Air	WSIG-FM	4/6/2022
Vice President & General Manager	Charlottesville,	VA Full Time Busine / Admi		
Advertising Account Executive	Richmond, VA	Full Time Sales	WRIC-TV	4/1/2022
Advertising Account Executive	Richmond, VA	Full TimeSales	WRIC-TV	3/28/2022
News Producer	Richmond, VA	Full TimeNews	WRIC-TV	3/24/2022
Marketing Producer	Richmond, VA	Full Promotion	onWWBT-TV	3/21/2022
Marketing Producer	Richmond, VA	Full Promotion	onWWBT-TV	3/21/2022
Multimedia Journalist	Lynchburg, Virginia	Full TimeNews	WSET-TV	3/17/2022
Reporter 1/MultiMedia Journalist	Richmond, VA	Full TimeNews	WRIC-TV	3/17/2022
IT Engineer	-	Full Engineerii Time	ngWWBT-TV	3/16/2022
News Producer	Lynchburg, Virginia	Full TimeNews	WSET-TV	3/16/2022
News Photograher	Lynchburg, Virginia	Full TimeNews	WSET-TV	3/16/2022
Research Coordinator	Roanoke	Full TimeSales	WFXR-TV	3/14/2022

## Job Posting for General Manager

Posted on Indeed.com, Allaccess.com, vabonline.com, and Virginia Workforce Connections

Based in Charlottesville and reporting to Monticello Media ownership, the Vice President and General Manager will provide leadership in the planning, organizing and managing of all Charlottesville and Blacksburg, VA radio stations, digital assets, and people.

You will be responsible for FCC and EEO compliance, market performance, broadcast and digital revenue, market share, engineering, budgeting, and profits and profit margins, while upholding our core values. You will directly supervise the Charlottesville sales team.

Ideally, you will have a track record of success in managing talented leaders, growing revenues, controlling expenses, and driving profit in an engaging highly accountable workplace.

## What You Will Do

- Oversee all station departments including content, sales, promotions, engineering, production, traffic, business, and community affairs.
- Create a clear vision and strategy for the stations and the market that provides all team members with a blueprint that will lead to improved results for the business.
- Drive results by developing and executing on the station's strategic and operating plans, achieves EBITDA goals consistent with the organization's financial and operating guidelines.
- Develop and lead an engaging workplace culture that includes a set of core values that all team members embrace so accountability is clear throughout the markets.
- Recruit, develops, and retains a strong leadership team; provide guidance and coaching to maximize their performance and accelerate their professional growth.
- Bring an innovative approach to established and proven radio operating models, including events and non-traditional revenue, resulting in improved efficiencies and business unit growth.
- Foster a digital culture to grow digital audience including mobile, mobile apps, and desktop, and drive revenue.
- Responsible for A/R collections (working with the Business Manager).
- Forecast market trends and set budgets and performance expectations.
- Responsible for maintaining the stations' reputation and market image.
- Create and maintain relationships with advertisers and potential advertisers.
- Directly manage the sales department in Charlottesville and oversee the sales manager/team in Blacksburg.
  - o Recruit, hire, and retain top sales talent
  - o Manage sales strategies for a multiple media portfolio

- Develop the skills of the sales department personnel and assist with individualized development plans
- Create a culture of cross-station and cross-product selling including radio, digital and NTR events
- o Develop and implement strategic plan to achieve revenue goals.
- Identify strategic opportunities to involve the market stations in community events and public affairs.
- Ensure the station is in compliance with all equal employment opportunity (EEO) and Federal Communications Commission (FCC) requirements.
- Perform other duties as may be assigned.

## .Why You Should Work at Monticello Media

Monticello Media is a Charlottesville, VA-based Digital, Radio and Event company formed in 2007, with a total of eleven radio stations in Blacksburg/Christiansburg/Pulaski and Charlottesville/Central Virginia, and a complete array of related interactive products. As a privately held company, we don't have to weigh the whims of Wall Street against the needs of the constituents we serve. Monticello Media's events, broadcast and digital products allow area businesses to reach and motivate their most desirable consumers.

You will be based in Charlottesville, centrally located in the eastern foothills of the Blue Ridge Mountains. It's been named best town for food lovers; best college town in the country; the country's favorite mountain town; and one of the happiest and healthiest places in the U.S.

Live in the home of Mr. Jefferson's University of Virginia, enjoying rich cultural, natural, and artistic history with access to first-rate museums, galleries, wineries, and shops. Many rivers and lakes provide the perfect setting for sailing, swimming, fishing, kayaking, canoeing, and tubing. Beautiful parks offer sports, picnics, relaxation, and adventure.

If this description fits and Monticello Media sounds like a company you want to work for, we'd love to have you join us. Send your resume to: george@monticellomedia.com.

It is the policy of the Monticello Media and the New River Radio Group not to discriminate in its employment and personnel practices because of a person's race, color, creed, religion, sex, national origin, disability, or age. Discriminatory employment practices are specifically prohibited by the Federal Communications Commission.

• Paused ~

es: Il total Add a candidate

Promote this job for more candidates: y in

Budget Job budget: 5.00 (USD) daily

Cost: 0.00 (USD)

← Back to jobs

#### **Digital & Broadcast Marketing Executive** New River Radio Group - Radford V/

Clicks Your job Gathering data...

Check back tomorrow to see how your job is performing.

#### Clicks this week

Increase budget for more clicks

Improve job description

#### Candidates

**Awaiting review** 

Total (excluding rejected)

Discover your top applicants faster by sending a free assessment

Get a more complete picture of each candidate by being able to view and compare their assessment score results when you turn on the assessment of your choice.

Also burns into a career the moment you realize you really like what you do. You'll work directly with business owners and managers, develop a keen understanding of their needs, and tailor marketing campaigns to meet those needs. Previous business or marketing experience is certainly a plus, but if you're highly professional in behavior and appearance, and have an unquenchable desire to learn, grow, and succeed, you can succeed beyond your dreams. We'll provide a paid training period with an eventual evolution to full commission. With broadcast and digital products at your disposal, your compensation is completely within your control. We are the Flagship stations for Virginia Tech and Radford University sports, so you'll be representing the region's most desirable products

#### Job Title: Digital & Broadcast Marketing Executive

Job description: Under the direction of the sales manager sell advertising within the assigned territory or accounts. Master and understand the value of radio advertising along with strengths and position of the New River Radio Group of Stations in Blacksburg. Focus selling local radio and online products.

- Excellent communicator with high level of verbal skills and written skills.

- Strong prospecting and business development proficiency
  2 years minimum successful outside sales preferred with a ventilable track record.
  The Account Executive must provide their own reliable transportation and maintain a valid Virginia driver's license.
  Strong working knowledge and understanding of the internet.
- Job duties and responsibilities include, but are not limited to:
  - You will provide valuable consultative services to small, mid-size and large firms and bring a concentrated focus on business development for both you and your clients
     Prospect for new accounts and identify local businesses that have a need for our products and services
     Set appointments, meet with clients, make sales presentations and execute contracts.
     Establish weekly/daily/monthly sales plan and then execute that plan.

  - As required by the client assists with writing advertising copy.
     Coordinate the production and scheduling of advertising with the production and traffic departments.

    If needed work in conjunction with the Promotions/Program Director to develop sales promotion programs that fit your client's needs and requests.

    Meet established revenue requirements.

  - Collect past due account receivables and work with the credit manager on problem accounts.
     Develop strategic and integrated plans to provide solutions to those challenges
     Closely monitor the progress of all client campaigns to ensure maximum success

- Minimum of two years of college
- 4 year college degree preferred

It is the policy of the New River Radio Group not to discriminate in its employment and personnel practices because of a person's race, color, creed, religion, sex, national origin, disability or age.
Discriminatory employment practices are specifically prohibited by the Federal Communications Commission

Job Type: Full-time

#### Benefits:

- Dental insurance
   Health insurance
- Paid time off

· Monday to Friday

Supplemental pay types:

Commission pay

Driver's License (Required)

Work Location: In person

From: Indeed <no-reply@indeed.com>

Sent: Wednesday, December 14, 2022 8:32 PM

To: PJ Styles <pj@hot1019cville.com>

Subject: Your Digital & Broadcast Marketing Executive job is live on Indeed!

Your Digital & Broadcast Marketing Executive role for Radford, VA 24141 is live.

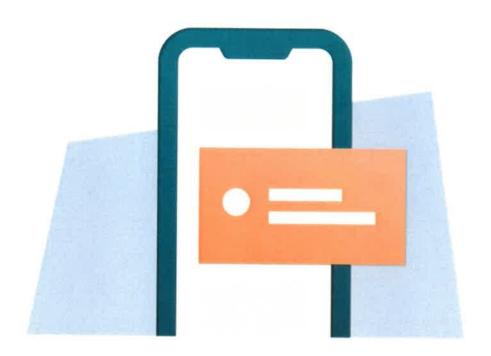
# indeed for employers

Post a

<u>Jobs</u> <u>Candidates</u>

## Your job is live!

Your **Digital & Broadcast Marketing Executive** role
for New River Radio Group
n Radford, VA 24141 is ready
for job seekers to see!



View the posting

View the posting

	Your Job 💠	Date posted \$	Location \$
•	Digital & Broadcast Marketing Executive	December 14, 2022	Radford, VA 24141
0	Digital & Broadcast Marketing Executive	December 12, 2022	Radford, VA 24141
0	Multimedia Account Executive	July 21, 2022	Charlottesville, VA 22901
0	Digital & Broadcast Marketing Executive	July 19, 2022	Radford, VA 24141
0	Online Digital Account Executive	April 11, 2022	Charlottesville, VA 22901
0	Administrative Assistant	February 8, 2022	Charlottesville, VA 22901
$\bigcirc$	Chief Engineer	February 4, 2022	Charlottesville, VA
0	Account Executive	January 20, 2022	Radford, VA 24141
0	Account Executive	September 30, 2021	Radford, VA 24141
0	Account Executive	August 26, 2021	Radford, VA 24141
<b>←</b>	1 2 3 4	→ Rows per page: 10 ∨	Showing 1-10 of 32

Digital & Broadcast Marketing Executive Radford, VA Posted: July 19, 2022 — Ends: August 3, 2022

Active

a New

G Contacting

0 Hired

Sponsored

0.00 (USD) Total cost
5,00 (USD) Daily

Job status • Paused •

Digital & Broadcast Marketing Executive Radford, VA Posted: December 12, 2022 — Ends: January 14, 2023

31 Applicants

Contacting

0 Sponsored 0.00 (USD) Total cost 150.00 (USD) Monthly

• Closed v

← Back to Jobs

#### **Digital & Broadcast Marketing Executive**

New River Radio Group - Radford, VA

Clicks Your job Gathering data...

Check back tomorrow to see how your job is performing.

Clicks this week

Increase budget for more clicks

#### Candidates

Awaiting review

Total (excluding rejected)

#### lob description

A job turns into a career the moment you realize you reality like what you do. You'll work directly with business owners and managers, develop a keen understanding of their needs, and tailor marketing rampaigns to meet those needs. Previous business or marketing experience is certainty a plus, but if you're highly professional in behavior and appearance, and have an unquendable desire to learn, grow, and succeed, you can succeed beyond your dreams. We'll provide a paid training period with an eventual evolution to full commission. With broadcast and digital products at your disposal, your compensation is completely within your control. We are the Flagship stations for Virginia Tech and Radford University sports, so you'll be representing the regions most

Job description: Under the direction of the sales manager sell advertising within the assigned territory or accounts. Master and understand the value of radio advertising along with strengths and position of the New River Radio Group of stations in Blacksburg. Focus selling local radio and online products.

#### Job requirements:

- Excellent communicator with high level of verbal skills and written skills
- . Strong prospecting and business development proficiency
- 2 years minimum successful outside sales preferred with a verifiable track record.
   The Account Executive must provide their own reliable transportation and maintain a valid Virginia driver's license
- Strong working knowledge and understanding of the internet.

#### job duties and responsibilities include, but are not limited to:

- You will provide valuable consultative services to small, mid-size and large firms and bring a concentrated focus on business development for both you and your clients
   Prospect for new accounts and identify local businesses that have a need for our products and services
- . Set appointments, meet with clients, make sales presentations and execute contracts.

- Statishis weekly/daily/monthly sales plan and then execute that plan,
   As required by the client assist with writing adventusing copy.
   Coordinate the production and scheduling of advertising with the production and traffic departments.
- . If needed work in conjunction with the Promotions/Program Director to develop sales promotion programs that fit your client's needs and requests. Meet established revenue requirements
   Collect past due account receivables and work with the credit manager on problem accounts.

- Develop strategic and integrated plans to provide solutions to those challenges
   Closely monitor the progress of all client campaigns to ensure maximum success

- Minimum of two years of college
- · 4 year college degree preferred

It is the policy of the New River Radio Group not to discriminate in its employment and personnel practices because of a person's race, color, creed, religion, sex, national origin, disability or age. Discriminatory employment practices are specifically prohibited by the Federal Communications Commission

#### Job Type: Full-time

Salary: \$36,000.00 - \$50,000.00 per year

## Renefits:

- Dental insurance
- · Paid time off Vision Insurance

Monday to Friday

#### Supplemental pay types:

Commission pay

Work Location: In person

Driver's License (Required)

♦ Closed ∨

Posted: December 12, 2022

Candidates: 31 total

Budget Job budget: 150.00 (USD) monthly Cost: 0.00 (USD)

Promote this job for more candidates:



Monticello Media DBA New River Radio Group 7080 Lee Hwy Radford, Virginia 24141

New River Radio Recruitment

7080 Lee Hwy

Radford, VA 24141



Advertiser:

New River Radio Recruitment

Order #:

4810363392433

Contract #: Date Entered: 404251 12/08/2022

Last Modified:

12/08/2022

Product:

Salesperson: Billing Cycle: Paul Johnson Calendar Month

Estimate #:

Order Date Range: 12/13/2022 through 01/01/2023 (3 weeks) Media Outlets: WBRW-FM, WPSK-FM, WRAD-AMFM, WVHK-FM

#### **On-Air Schedule**

#	<u>Dates</u>	<b>Station</b>	Time/Program	Len	Мо	Tu V	Ve '	Th	Fr :	Sa	Su S	s/W	Rate	Qty	Total
1	12/13/22-12/18/22	WBRW-FM	05:00AM-11:59PM	60		6	6	6	6	6	6	36	0.00	36	0.00
2	12/13/22-12/18/22		05:00AM-11:59PM	60		6	6	6	6	6	6	36	0.00	36	0.00
3	12/13/22-12/18/22	WRAD-AMFN	105:00AM-11:59PM	60		6	6	6	6	6	6	36	0.00	36	0.00
4	12/13/22-12/18/22	WVHK-FM	05:00AM-11:59PM	60		6	6	6	6	6	6	36	0.00	36	0.00
5	12/19/22-01/01/23	WBRW-FM	05:00AM-11:59PM	60	6	6	6	6	6	6	6	42	0.00	84	0.00
6	12/19/22-01/01/23	WPSK-FM	05:00AM-11:59PM	60	6	6	6	6	6	6	6	42	0.00	84	0.00
7	12/19/22-01/01/23	WRAD-AMFM	105:00AM-11:59PM	60	6	6	6	6	6	6	6	42	0.00	84	0.00
8	12/19/22-01/01/23		05:00AM-11:59PM	60	6	6	6	6	6	6	6	42	0.00	84	0.00
					_		_	_	_	-	-	- T Ma	0.00	04	0.00

#### **Station Totals**

<u>Station</u>	On-Air Count	<b>Digital Count</b>	Web Count	Other Count	Gross Billing	Net Billing
WBRW-FM	120	0	0	0	\$0.00	\$0.00
WPSK-FM	120	0	0	0	\$0.00	\$0.00
WRAD-AMFM	120	0	0	0	\$0.00	\$0.00
WVHK-FM	120	0	0	0	\$0.00	\$0.00
Totais	480	0	Ó	0	\$0.00	\$0.00

**Total Charges:** \$0.00 **Total Net:** \$0.00

	Projected B	illing By Calendar Month Month	
<u>Month</u>	Year	Gross Billing	Net Billing
December	2022	\$0.00	\$0.00
January	2023	\$0.00	\$0.00
Totals		\$0.00	\$0.00

Accepted for advertiser OR agency as agent for the advertiser

Name

Title

Name

Title

New River Radio

Account Executive Recruitment: 60

12/8/2022

The job is Marketing Consultant. Sounds big, and it sort of is. But instead of a list of qualifications and duties, let's talk about attitude. If you don't let excuses get in your way, you're qualified. If you're not professionally satisfied, but refuse to wait for someone else to make it better, you're qualified. If you're more comfortable listening than talking, you're qualified. If you're feisty, spunky, or precocious, you're qualified. We can teach you the rest. Of course, you need to be trustworthy, reliable, organized...and you have to care. Marketing Consultants at New River Radio work with area businesses and show them the value of well constructed marketing strategies. Yes, it's sales, but our traditional and digital products work. If you're professional in mind and appearance, and have the attitude, we'll train you for the skill. We have offices in Blacksburg and Fairlawn, so you work where it's best for you. Email paul@newriverradio.com with your resume and thoughts. New River Radio and Monticello Media are Equal Opportunity Employers.

# Linked-in job announcement for Account Executive position filled on 1/12/2023

Status is online

Paul JohnsonPaul Johnson• You• YouVice President-General Manager, New River Radio GroupVice President-General Manager, New River Radio Group Smo • 5mo •

Control what you can control. That's the job description.

I could go on and on with a list of qualifications and duties of a Marketing Consultant for our media products, but would it help? Or you may think you're not qualified.

But if you don't let excuses get in your way, you're qualified. If you're not professionally satisfied, but refuse to wait for someone else to make it better, you're qualified. If you're more comfortable listening than talking, you're qualified. If you're qualified. If you're feisty, spunky, or precocious, you're qualified. We can teach you the rest.

If you're in the New River Valley of beautiful Southwest Virginia, send me a note and we'll talk. Or if you KNOW someone who this describes, please pass it on.

paul@newriverradio.com



## WVHK FM (69744) 2023 EEO Audit

## **ATTACHMENT C**

**Recruitment Initiative Documentation** 



New River Valley, VA - find your fun-



## Experience Pulaski Expo & Job Fair

Venue: Randolph Park, Pulaski

Organizations: Pulaski County Chamber of Commerce

Date: Thursday, August 12, 2021

Time: 2.00 - 6:00 PM

Event Types: Food, Miscellaneous, Business Related

Cost: Free Description:

The Pulaski County Chamber of Commerce presents Experience Pulaski Expo & Job Fair at Randolph Park in Pulaski, VA on Thursday, August 12, 2021.

The Pulaski County Chamber of Commerce will celebrate area businesses at the Experience Pulaski Expo & Job Fair. From 2:00–6:00 pm, we welcome local citizens to join us and experience all Pulaski has to offer. Explore businesses that serve our area, find job opportunities, fun for the kids, and grab a bite to eat as Commonwealth Catering will have the Randolph Park Concessions open.

In search of a career? Pulaski employers have something for everyone at the Experience Pulaski Expo & Job Fair. Job seekers will find an array of job openings available at every skill level boasting benefits and competitive pay. Employers range from small businesses to international companies.

Randolph Park is located at 5100 Alexander Road in Dublin, VA.

To view the event flyer, visit: https://mgur.com/g08C7nw-

For more information, visit: https://members.pulaskichamber.info/gvents/details/expenience-pulaski-experience-202 or https://www.facebook.com/Pulaski-County-Chamber of Commerce-102867006722/ or email info@pulaskivachamber.org.

#### Return to the Featured Events List

Want to hear the latest on what's happening with local events in the New River Valley?

Click here to Sign up for our Email Newsletter.

Also join NextThreeDays on Facebook and Twitter.

facebook Configuration





About Chamber Engagement Our Community/Pulaski Lifestyle What's New Join Today!







On Thursday August 12, 2021. Pulaski County Chamber of Commerce will celebrate area businesses at the Experience Pulaski Expo & Job Fair at Rangolph Park From a go - 6.00 pm we welcome the citizens to join us and experience all Pulaski has to offer Find businesses in retail service industry healthcare, recreation and more. Grab a bite to eat as Commonwealth Catering celebrates our 9 international companies that call Pulaski home with food representing those counties.

In search of a career? Pulaski employers have something for everyone at the Experience Pulaski Expo & Job Fair Job seekers with find an array of job openings available at every skill level bosting benefits and competitive pay Employers range from small businesses to international companies

Exhibiting businesses will benefit from a networking tunch before the event, as well as seminars on our informative main stage. There will be a residency BOSS's Table discussion and an informational session from Virginia Career Works New River/ Mt. Rogers on the event stage NRV employers can learn about the numerous resources and services offered by the NRV Business Services Team regardless of size or industry type.

Business registration is now open

2021 Experience Pulaski Expo & Job Fa...



#### ① Date and Time

Thursday Aug 12 2021 12 00 PM - 6 00 PM EDT

Networking Lunch 12-130 Experience Pulaski Expo & Job Fair -200-600

#### fil Location

Randolph Park, 5100 Alexander Rg. Dublin VA 24084

#### 5 Fees/Admission

Reservations \$95 for members \$150 for non-members - includes networking tunch for up to 2 employees reserved space. All businesses must provide their own tent, table and chairs

Hi Tyler Casey,

Your P1 Plus Final Review (S4) with Cole Grieves at 11:00am (Eastern Time - US & Canada) on Thursday, November 17, 2022 is scheduled.

Final P1 Plus project review (assignments 4 and 5) for participants and their managers with a P1 Learning team member.

#### Location:

This is a Zoom web conference.

You can join this meeting from your computer, tablet, or smartphone.

https://us02web.zoom.us/j/84352938909

One tap mobile:

+1 309 205 3325,,84352938909#

+1 312 626 6799,,84352938909#

You can also dial in using your phone.

US: +1 309 205 3325, +1 312 626 6799, +1 646 931 3860, +1 929 436 2866, +1 301 715 8592, +1 346 248 7799, +1 360 209 5623, +1 386 347 5053, +1 507 473 4847, +1 564 217 2000, +1 669 444 9171, +1 669 900 6833, +16892781000, +1 719 359 4580, +1 253 215 8782

Meeting ID: 843-529-38909

Find your local number: https://us02web.zoom.us/u/kjW7UVY1y

Your Answers:

Best phone number to reach you (in case of connection issues with Zoom)

+1 757-763-8903

Manager's Name

Paul Johnson

Manager's Email

Former: Paul2

Updated: Paul@newriverradio.com

## P1 Plus: Final Project Reminder



## Cole Grieves <cole.grieves@p1learning.com>

11/10/2022 10:08 AM



#### Good morning,

Today is the day! Don't forget assignments 4 and 5 are due by the end of the day. There are still quite a few outstanding, but thanks to those of you who have turned them in.

Also, if you have not signed up for a one-on-one, please do so as soon as possible. Here's the link: <u>P1 Plus Final Review Availability</u>.

Starting tomorrow, I'll be following up with those missing assignments or who haven't signed up.

Holler if you have questions! Cole

Cole Grieves | Client Success Manager | (913) 232-2398 p1learning.com | @p1learning | Like | Linkedin | Videos



From: Dan McKinney <radfordchamber+gmail.com@ccsend.com>

**Sent:** Wednesday, February 22, 2023 11:05 AM **To:** Paul Johnson paul@newriverradio.com>

Subject: Thank you for registering for March Business Over Breakfast

## **March Business Over Breakfast**

Come out to Arabica Cafe & Bakery and we will discuss the new and exciting opportunities for Chamber of Commerce members in 2023. In addition, Paul Johnson from New River Radio will be speaking about broadcasting philosophies and opportunities. This is a free event.

Wednesday, March 1, 2023 from 8:00 AM to 9:00 AM EST

#### **Arabica Cafe**

1158 E. Main Street Radford, VA 24141

Thank you again for registering for our event. This email is confirmation of your successful registration. If any of the information displayed below is incorrect, please contact us as soon as possible.

#### Personal Information

First Name:

Paul

Last Name:

Johnson

Email Address

paul@newriverradio.com

#### Contact

Dan McKinney Radford Chamber of Commerce 540-639-2202 radfordchamber@gmail.com

Add to Calendar
Go to event page

This email was sent to paul@newriverradio.com by radfordchamber@gmail.com because you registered for March Business Over Breakfast. Click here if you no longer wish to receive emails about this event.

Radford Chamber of Commerce | 200 3rd Ave | Radford | Virginia | 24141

Re: New River Radio

Bill Roth <vtvoice@vt.edu>

Wed 5/24/2023 8:34 AM

To: Paul Johnson <paul@newriverradio.com>

Dear Paul,

On behalf of the Sports, Media, and Analytics program at Virginia Tech, I want to thank the Monticello Media stations for an outstanding academic year of our broadcasting partnership.

So many of our students were able to participate during both semesters of this past year, and we consider it a valuable piece of their educational experience. It lets them put their classroom education into practical use in a professional setting.

Again, thank you for opening up those opportunities for our students.

Bill

## WVHK FM (69744) 2023 EEO Audit

## **ATTACHMENT D**

**EEO Training, Review, and Implementation Initiatives** 

# From activity classification 14 in 2022-2024 EEO Activities menu. Employee Hand book

## **EQUAL OPPORTUNITY EMPLOYER**

It is the policy of the Company to provide equal opportunity for employment, development and advancement to all current and potential employees without regard to age, race, sex, religion, color, creed, national origin, marital status, pregnancy and child-birth or related medical condition, ancestry, handicap, sexual orientation or any other characteristic or condition protected by applicable state of federal law. Equal employment opportunity will be extended to all persons in all aspects of the employee-employer relationship, including recruitment, hiring, upgrading, training, promotion, transfer, discipline, layoff recall and termination.

Nondiscrimination and diversity are foundation principles in our Company. It is company policy to hire and promote the best qualified candidate measured against the requirements of the job, and to provide equal employment and advancement opportunities for all individuals without discrimination because of age, race, sex, religion, color, creed, national origin, marital status, pregnancy and child-birth or related medical condition, ancestry, handicap, sexual orientation or any other characteristic or condition protected by applicable state of federal law.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to age, race, sex, religion, color, creed, national origin, marital status, pregnancy and child-birth or related medical condition, ancestry, handicap, sexual orientation or any other characteristic or condition protected by applicable state of federal law.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission (FCC), we have adopted an Equal Employment Opportunity Program which includes the following elements:

## 1. Responsibility for Implementation

George R. Reed, President, Vinnie Kice VP/OM/HR Manager, and Mike Chiumento VP/GM will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation,

training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of age, race, sex, religion, color, creed, national origin, marital status, ancestry, handicap, sexual orientation or any other characteristic or condition protected by applicable state of federal law.

#### 2. Policy Dissemination

To ensure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy the following communication efforts will be made:

- a) The station's employment application forms will contain a notice informing prospective employees that discrimination because of age, race, sex, religion, color, creed, national origin, marital status, pregnancy and child-birth or related medical condition, ancestry, handicap, sexual orientation or any other characteristic or condition protected by applicable state of federal law is prohibited and that they may notify the appropriate local, state or federal agency if they believe they have been the victims of discrimination.
- b) Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, state, or federal agency if they believe they have been the victims of discrimination.

#### 3. Recruitment

It is the policy of the Company to ensure that information concerning each fulltime vacancy is widely disseminated so as to encourage the recruitment of a diverse workforce.

## REASONABLE ACCOMMODATION

The Company makes reasonable accommodations for disabled employees. Information obtained concerning individuals needing accommodations is kept confidential, except that leaders and managers may be informed regarding restrictions on the work duties of disabled individuals, and information regarding necessary accommodation.

This policy applies to all areas of employment, including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.

## IRCA COMPLIANCE

It is the policy of the Company to employ only those individuals who are lawfully eligible to work in the United States. The Company will require all new hires to complete the I-9 Form and to present documentation that establishes identity and work authorization. The I-9 Form must be completed within three working days of the employee's first day of

employment. Failure to complete properly the I-9 Form within the required time period can result in termination.

POLICY PROHIBITING HARASSMENT, DISCRIMINATION AND RETALIATION

The Company is committed to providing a work environment free from unlawful discrimination harassment and retaliation. In furtherance of that goal, the Company is providing guidance regarding conduct that is strictly prohibited and procedures for reporting such prohibited conduct. If you experience or observe conduct that you believe to be inappropriate in promoting a diverse and productive work environment, you may use the procedures of this policy to have it addressed, even if it does not clearly fall within the descriptions set forth below

#### PROHIBITED CONDUCT

Discrimination, harassment, and retaliation will not be tolerated, whether engaged in by the Company employees or third parties (i.e. customers and vendors) In particular:

#### Discrimination

Discrimination against employees, applicants, or other third parties doing business with the Company based on the individual's race, color, age, sex pregnancy, national origin, religion, disability, genetic information, sexual orientation, gender identification, ancestry, veteran status, or other legally protected status is <u>strictly prohibited</u>. Discrimination includes unequal treatment based on any of the forgoing categories.

#### Sexual Harassment

Sexual harassment of employees, applicants, or other third parties doing business with the Company is strictly prohibited. Sexual harassment generally includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature which has the purpose or effect of creating an intimidating, hostile, or offensive working environment. The behaviors listed below are examples of the types of behaviors that may fall under this policy:

- 1. Physical Conduct: Unnecessary touching, pinching, patting, fondling, massaging, kissing, hugging, grabbing, brushing against a person's body, blocking a person's path, exposing oneself, or coercing sexual intercourse.
- 2. Verbal Conduct: Foul or obscene language, sexual propositions, sexual innuendo, sexual jokes, crude jokes about gender-specific traits, threats, discussing sexual activities, graphic or suggestive comments about an individual's body or dress, sexually degrading words to describe an individual, derogatory sexual comments, epithets, slurs, or spreading rumors about a person's sex life.

3. Nonverbal Conduct: Display of sexually suggestive objects or pictures such as sexually explicit pinups or calendars depicting nude or partially nude persons, sexual graffiti, pornography, sexual cartoons, unseemly gestures or facial expressions, leering, whistling, catcalls, suggestive noises, crude pranks, giving gifts or letters of a sexual nature, or texting or e-mailing messages of a sexual nature.

Conditioning or attempting to condition employment, assignment, compensation, advancement, benefits, or any personnel action on the granting of sexual favors is <u>strictly prohibited</u>. Making or threatening reprisals after a negative response to sexual advances is also <u>strictly prohibited</u>. It should never be stated or implied that an individual's submission to or rejection of requests for dates or sexual favors will have any effect on the individuals' employment, assignment, compensation, advancement or any other condition of employment.

#### Other Harassment

Harassment of employees, applicants or other third parties doing business with the Company based on an individual's race, color, age, sex, pregnancy, national origin, religion, disability, genetic information, sexual orientation, gender identification, ancestry, veteran status or other legally protected status is <u>strictly prohibited</u>. Inappropriate behavior or material includes, but is not limited to, offensive name-calling, slurs, taunting, epithets, graffiti, jokes, posters, calendars, e-mails, texts, internet sites, or other things deemed inappropriate by the Company. Such harassment includes verbal or other conduct that ridicules or maligns individuals or groups or has the purpose or effect of creating an intimidating, hostile or offensive work environment based on any of the foregoing categories.

#### Retaliation

Retaliation or reprisal against any person who makes a good faith complaint of discrimination or harassment or who participates as a witness or assists in carrying out an investigation of such a complaint is strictly prohibited.

## PROCEDURE FOR REPORTING PROHIBITED CONDUCT

## Reporting

All employees must report incidents of discrimination, harassment, or retaliation immediately. If you believe you or another employee is experiencing discrimination, harassment, or retaliation, you should report the alleged discrimination, harassment, or retaliation to the Operations Manager, HR Manager, General Manager or your immediate supervisor, who will then report to the OM or GM. In the event that the alleged discrimination, harassment, or retaliation is perpetrated by the OM or GM, you should report to President of the Company, George Reed. In the event that the alleged discrimination, harassment, or retaliation is perpetrated by the President, you should report to the Operations Manager or the General Manager.

If you are uncomfortable reporting to any of the individuals listed above, you are dissatisfied with the response by any of the individuals listed above, or such reports would be inappropriate for whatever reason, you may report to any supervisor in the organization

## **Investigation Process**

The Company takes all reports of discrimination, harassment, and retaliation seriously and each will be promptly and fairly investigated. Upon receipt of an allegation of discrimination, harassment, or retaliation, the Company will investigate, which may include interviewing witnesses, reviewing documents and electronically stored information, and conducting any other activities necessary and appropriate for a fair and thorough investigation. The scope of the investigation will depend on the circumstances of the allegations.

The employee who alleges that he or she is a victim of discrimination, harassment, or retaliation will be provided a high-level summary of the findings of the investigation and an opportunity to rebut those findings. Likewise, any employee accused of discrimination, or retaliation will be provided a high-level summary of the findings of the investigation and an opportunity to rebut those findings. After considering the information gathered from the investigation, and any additional rebuttal information, the Company will make a decision regarding appropriate corrective action.

## Confidentiality

Confidentiality will be maintained throughout the investigatory process to the extent possible, consistent with a thorough investigation and appropriate corrective actions. To that end, the high-level summary of findings from the investigation provided to employees may be limited based on the need to protect confidentiality of employees, depending on the circumstances.

#### **Retaliation Prohibited**

Retaliation against an employee who makes a good faith report of prohibited conduct or who participates as a witness or assists in carrying out an investigation of such a complaint is strictly prohibited. Any retaliation or suspected retaliation should be reported, using the same procedures described above.

## **Disciplinary Action for Violation of this Policy**

Where a violation has been substantiated, appropriate disciplinary actions will be taken. Disciplinary actions will be as severe as determined necessary to eliminate the prohibited conduct and prevent it from recurring. Disciplinary actions may include suspension or immediate discharge from employment.



## 2023 UPDATE: A GUIDE TO HR COMPLIANCE

The purpose of this Guide is to summarize key changes in key labor laws and regulations that occurred last year, as well as provide suggested guidance on forthcoming changes and recommended action items.

- 1 COVID-19 Quick Reference Guide
  Important information to reference when navigating COVID-19 in the workplace
- Federal & Multi-State Update
  Incoming legislative & prospective regulatory changes, affecting the nation or multiple regions
- 3 Appendix
  Includes a Guide to Required & Recommended Training

#### CONTRIBUTORS

Jesse Hansen | Senior Employee Benefits Attorney Carolyn Harmon | Benefits Compliance Consultant Serene Lin | Manager, HR Consulting Vathana Sivanesan | HR Consulting and Benefits Counsel Jamie Webb-Akasaka | Vice President, HR Consulting Counsel