

**Sample Settlement Agreement**

**COUNTY OF CUYAHOGA  
COMMISSION ON HUMAN RIGHTS**

**IN THE MATTER OF:**

**Complainant,**

**v.**

**Respondents.**



**Case No.**

**SETTLEMENT AGREEMENT**

Complainant and Respondent agree to settle the above-captioned complaint. In consideration of the mutual covenants contained in this agreement, the parties agree as follows:

1. Complainant agrees to waive his/her right to proceed further with Case Number \_\_\_\_\_ at the Cuyahoga County Commission on Human Rights.
2. Respondent agrees to:
3. (\_\_\_) Further terms of this Settlement Agreement are contained on the attached \_\_\_ page/s of this document. (Check if there are additional pages and designate the number of pages attached.)

The Cuyahoga County Human Rights Commission shall retain jurisdiction over this Settlement Agreement to seek compliance with it and, in some cases, to seek enforcement of it, and the parties acknowledge that the Commission has jurisdiction to impose civil penalties for a violation or breach of the Settlement Agreement. Cuyahoga County Council Ordinance No. 02018-0009, Title 15, Chapter 1501.03(D)(5). The CCHRC has in some cases, jurisdiction to seek enforcement of it, and the parties acknowledge that the Commission has jurisdiction to seek judicial enforcement of this Settlement Agreement. Cuyahoga County Council Ordinance No. 02018-0009, Title 15, Chapter 1501.05(D).

The signing of this Settlement Agreement does not constitute an admission by any party hereto that a violation of the Human Rights Ordinance/Anti-Discrimination Ordinance did or did not occur. The parties entered into the Settlement Agreement only for the purpose of resolving this complaint.

Pursuant to Cuyahoga County Council Ordinance No. 02018-0009, Title 15, Chapter 1501.03(D)(4), this Settlement Agreement must be submitted to the Commission for approval. If the proposed settlement is knowingly and voluntarily entered into, unambiguously drawn, capable of being enforced, signed by persons with authority to sign the agreement, and consistent with the applicable ordinance, the Commission shall enter an order approving the Settlement Agreement and dismissing the Complaint.

Complainant

Respondent

\_\_\_\_\_  
\*Signature

\_\_\_\_\_  
\*Signature

Dated \_\_\_\_\_

Print Name \_\_\_\_\_

Title \_\_\_\_\_

Dated \_\_\_\_\_

\_\_\_\_\_  
Witnesses and Date