

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MATTHEW CHRISTIANSEN,

15 Civ. 3440 (KPF)

Plaintiff,

-against-

OMNICOM GROUP, INC., DDB
WORLDWIDE COMMUNICATIONS
GROUP INC., JOE CIANCIOFFO,
PETER HEMPEL and CHRIS BROWN,
Defendants.

DECLARATION OF
ANDY TARRADATH

ANDY TARRADATH certifies as follows:

1. I am over the age of 21, live in New York and am a gay African American male. I worked at DDB from June, 2010 to July, 2014. I witnessed Joe Cianciotto's harassment at the workplace.
2. Joe's drawing board in his office always had people fornicating, and showed men with genitalia having gay sex. Joe drew men fornicating always involving a gay employee with another employee. There was one picture with a red marker of stick figures with penises that he narrated the stories using employee names. These drawings were posted so whenever there were meetings in his office the employees had to uncomfortably see these pictures.
3. In the Summer of 2011 during a creative meeting in Joe's office, I was present along with an employee named Luke and about 2-3 other people. Joe looked at Luke and said what happened to your hair? Luke said he got a haircut which was a buzz cut closely shaven to his head. Joe said "You look like an Aids patient." Everyone was shocked and Joe just continued the meeting. Joe would give perverted Christmas gifts. He gave me a leotard thong. He gave another woman a President Obama statute with his penis out. I know that a female employee named Karina complained about Joe. I witnessed him talking to Shawna Laken in a very unprofessional and degrading manner. She eventually left the job and the EEOC contacted me regarding her complaint about the hostile conditions there.
4. The company's response about complaints was that's just Joe and he's harmless. Joe's behavior affected my work, caused me anxiety and depression and I wanted to get away from that environment as a gay man who feared being harassed by him. DDB did nothing despite our complaints and in fact promoted Joe twice, so we felt powerless. I never knew there was any other place to complain such as the EEOC.

5. Joe harassed me on many occasions as a black gay male. Once in his office with a group of people he was reviewing stock imagery, then directed his racial and sexual orientation comment at me as "I don't want this to be too black, too gay, you know what I mean."


6. I worked with Matthew on a State Farm project. In about 2012, I was sitting in Matthew's office when Joe came by to discuss work. I saw Matthew was uncomfortable in the presence of Joe. He was fidgety and tense when Joe was near him. I know Matthew as a gregarious guy and I could tell he was uncomfortable and tense near Joe.

7. I saw the Muscle Beach poster. It was deliberate to put Matthew on his back with his legs on the air to harass him for being gay. It connotes Matthew as a gay sissy bottom.

9. I am aware that employees were routinely promised raises when they were promoted but never received the raise as promised. They promoted me, gave me more job responsibilities and work but never paid me six months of my. I finally quit working there because I could no longer tolerate the sexual and racist abusive environment there and their not paying us promised wages.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 18, 2015



ANDY TARRADATH