

**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
RYAN MURPHY**

RYAN MURPHY certifies as follows:

1. I am over the age of 21, live in Brooklyn, New York and am a gay male. I worked at DDB from February 2005 to March of 2014. Joe Cianciotto was my direct supervisor for about the last 6 years of that time.
2. I witnessed Joe create a hostile workplace on a number of levels, including sexuality, gender, gender expression, race, national origin, religion and disability. I complained to Wendy Raye in Human Resources over the last few months of my employment. I did not complain before then out of fear of repercussions to my job because Joe was my supervisor. Joe often talked about his power to fire people who he thought had crossed him.
3. The EEOC contacted me in about July, 2014 to discuss a female employee's complaints about the hostile workplace she experienced at DDB. She was pursuing a wrongful termination case. She had complained about Joe's sexual comments at an offsite shoot and was fired soon after. I witness countless incidents where Joe had made sexually inappropriate comments directed towards female coworkers. Many female colleagues complained to me about it, but expressed hopelessness about complaining.
4. Because I am gay, I received a daily interrogation from Joe about gay sex and how it worked. To target me as a gay man, Joe would say in front of other employees that I took children to my cabin in Pennsylvania and had sex with them and killed them.
5. Joe talked about sex inappropriately all the time. He would ask Ryan about gay sex. If there were 10 people in his office, he would ask the men "You do anal" or ask the women "You give blow jobs, right."
6. When Matthew Christiansen I witnessed Joe repeatedly asking about his sexuality and accusing him of having AIDs and speculating about his HIV status. When Matt first started working at DDB Joe approached me and repeatedly asked me if he [Matt] had HIV. He asked "Yes, you're gay, but Matt is super gay, he sleeps with everyone. He must have HIV, right?" Joe told me that Matthew was a stereotypical gay who talked and dressed gay. Joe would also refer to Matt as a "poof", which is a British word for a gay man, or a fairy. Joe repeated asked if Matthew was a "bottom", or submissive during sex, and frequently asked me to identify bottoms