

among his staff. He would also talk about women's anatomy in a derogatory manner at work. I did not engage in the conversation, so Joe made fun of me at work for being uptight.

7. I never told Matthew about Joe accusing him of having AIDs and being HIV positive.

8. Joe would create posters to humiliate employees by photoshopping their faces from Facebook into pictures that mocked their sexuality, gender, religion or race. For instance, an Arab employee was placed on a flying carpet. I absolutely believe the Muscle Beach poster Joe created deliberately depicted Matthew as a gay sissy with his legs in the air. It is consistent with a theme of Joe humiliating gay men, particularly Matthew as a bottom with AIDs.

9. In the time I worked with Joe, he had a lot of power to promote employees, assign projects and control the quality of their jobs. He often would keep people late for no apparent reason when he knew they had plans. He spoke often about having the authority to fire employees at will, so we feared complaining. It was known that DDB would not do anything regarding Joe's harassment. There was another senior executive named Eric Silver who also sexually harassed women in front of many employees for a long time, so it was a systemic problem at DDB. I believe Joe was protected by senior leadership.

10. After I complained and then left the job, DDB did not offer to give me an exit interview.

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

Dated: June 22, 2015



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**RYAN MURPHY**