

DECLARATION OF [REDACTED] PURSUANT TO 28 U.S.C. § 1746  
UNDER THE PENALTY OF PERJURY

1. I am [REDACTED]. I am over the age of 18 and make this Declaration based on personal knowledge.
2. I worked with Ms. [REDACTED] and Mr. Luis Anzola at the Coach House flagship location in New York City (Coach) from February of 2023 until September of 2023.
3. I was hired as a sales associate in November of 2022.
4. Ms. [REDACTED] was the Store Manager of Coach during my employment.
5. Ms. [REDACTED] was my direct supervisor.
6. During my time at Coach, Mr. Anzola made inappropriate comments to and invaded the personal space of Ms. [REDACTED] several times per week.
7. Mr. Anzola frequently made comments referring to Ms. [REDACTED] physical appearance, and relationship status.
8. Mr. Anzola regularly left his own workstation in order to stare at and stand directly behind Ms. [REDACTED] while she worked, invading her personal space.
9. Prior to March 2023, my coworker, [REDACTED] informed me that Luis was "handsy."
10. In March of 2024, Ms. [REDACTED] reported Mr. Anzola's behavior to [REDACTED]
11. Following Ms. [REDACTED] complaint, [REDACTED] conducted an internal investigation by observing Mr. Anzola on the sales floor and speaking to myself and some of my coworkers.
12. [REDACTED] informed me that because Luis had been with Coach for a long time, she would not be able to "do much" to discipline him.
13. [REDACTED] informed me that she issued a verbal warning to Luis.
14. Mr. Anzola often behaved flirtatiously with female customers. He asked customers whether they were married, told them that they were beautiful, and stood so close to them that customers took a step back, away from Mr. Anzola.
15. During my time at Coach, I experienced inappropriate sexual advances from a fellow sales associate, [REDACTED] [REDACTED] frequently made sexual innuendos, jokes, and comments about my body. He showed me explicit sexual content on his phone, and

once in a "Boudoir" magazine which he handed out to myself and my coworkers. It contained photos of naked men.

16. I reported the sexual harassment to [REDACTED], at which time she conducted an internal investigation. [REDACTED] asked me to report any more instances of harassment to her.
17. The harassment continued after my first report; I reported two additional instances of sexual harassment from [REDACTED] to [REDACTED]. Each time [REDACTED] told me to report to her if it happened again.
18. After I reported the sexual harassment, the management at Coach often accused me of not being a good team member and of stealing sales from coworkers. Prior to my complaint, I had never received any such feedback.
19. I resigned from my position as Sales Associate in September of 2023.
20. During my exit interview with [REDACTED] I informed [REDACTED] that I was resigning because I felt disconnected from my coworkers and from Coach's management due to the change in attitude after I reported my experience of sexual harassment.
21. I declare under penalty of perjury that the foregoing is true and correct.

  
[REDACTED]

08/20/2024  
Date