

## **Declaration of María Araceli Gonzales Flores**

1. My name is María Araceli Gonzales Flores. I am a 22 year-old Mexican woman who resides in New York City.
2. I worked at Ramco and National Discount, retail stores located at 190-192 Dyckman Street, New York, New York, 10040, from approximately October 8, 2003 until I was constructively discharged on approximately January 2004. My duties included but were not limited to working as a cashier, helping customers, unpacking and stacking merchandise, sewing and ironing merchandise, cleaning the store, and going to the bank.
3. Albert Palacci, the owner of the retail stores and my manager, sexually harassed me and sexually assaulted me on more than one occasion.
4. Mr. Palacci further mistreated me by not paying me the minimum wage or overtime. During the entire course of my employment, Mr. Palacci only paid me \$40.00 a day. I usually worked from approximately 9:45 a.m. until 7:30 p.m., six days a week.
5. On many occasions, Mr. Palacci touched my buttocks, tried to hug me, and put his hands on my waist. On several occasions, he also rubbed his body against mine.
6. When I asked Mr. Palacci for permission to take time off to go to the gynecologist, Mr. Palacci made an obscene gesture with his hands and said, "I can check you out."
7. Mr. Palacci watched pornographic videos in his office. On one occasion, I went to Mr. Palacci's office to retrieve my purse, where Mr. Palacci insisted employees store all bags, and saw Mr. Palacci watching a pornographic video.
8. Mr. Palacci told me that if I was "good," he would buy me lingerie. I rejected this proposition.
9. Mr. Palacci regularly told me that I had to do everything he wanted me to do.
10. Mr. Palacci called me derogatory names on several occasions.
11. Mr. Palacci made the working conditions at the stores so difficult and unpleasant that I felt compelled to stop working at the stores. In or about January 2004, I stopped working at the stores.
12. By the conduct described herein, I believe that I was subjected to gender discrimination.
13. The foregoing is a brief summary of my experiences and is not intended to be an exhaustive account.

14. I swear or affirm, under penalty of perjury, that the above is true and correct.

Dated: May \_\_\_\_, 2004  
New York, NY

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María Araceli Gonzales Flores