

## **Declaration of Angela Berise Peralta Fritman**

1. My name is Angela Berise Peralta Fritman. I am a 22 year-old Dominican 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 September 8, 2002 until I was constructively discharged on approximately October 25, 2003. 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. In addition to working at the retail stores, I also worked at the house of Albert Palacci, the owner of the retail stores and my manager, where I cleaned, washed clothes, cooked, washed dishes, and shopped for groceries.
3. Mr. Palacci sexually harassed me and sexually assaulted me on more than one occasion. Mr. Palacci told me that I could receive a salary increase only if I had sex with him.
4. Mr. Palacci further mistreated me by not paying me the minimum wage, overtime, or one extra hour of pay for the days that I worked 10 or more hours. During the entire course of my employment, Mr. Palacci only paid me \$30.00 a day. I usually worked from approximately 9:45 a.m. until approximately 9:00 p.m. three days a week and from approximately 9:45 a.m. until approximately 7:30 p.m. three days a week.
5. In or around April 2003, I asked for a raise. Mr. Palacci responded by asking me what I was going to give him in "exchange." When I asked for an explanation, Mr. Palacci told me that he wanted to have sex with me. I refused his advances and, accordingly, I did not receive a raise.
6. Mr. Palacci retaliated against me for rejecting his advances by reducing my work schedule to three days a week, thereby reducing my income. My reduced schedule remained in effect for approximately one month.
7. In the summer of 2003, Mr. Palacci ordered me to accompany him and my co-worker, Deyanira Espinal, to a house in Brooklyn, New York, purportedly to clean the house. When we arrived at the house, Mr. Palacci locked the door behind us and demanded that we have sex with him. We refused. Mr. Palacci then ordered us to strip to our underwear and model for him. When we refused to undress, Mr. Palacci undressed, told us to look at his body, and again demanded sexual favors. When we refused his demands, Mr. Palacci physically assaulted us by grabbing our arms and throwing us on a bed.
8. In or about the fall of 2004, I went into the basement of the retail stores to retrieve merchandise and I saw a bed there. Mr. Palacci told me that it was there so that he could have sex with women, and he asked me to have sex with him. I refused to have sex with him.

9. In or around September 2003, a co-worker and I accompanied Mr. Palacci to a trade show in midtown Manhattan. After the show, Mr. Palacci told the coworker to return to the retail stores because Mr. Palacci and I were going to attend another trade show. When the co-worker left, Mr. Palacci asked me to go to a hotel with him. Mr. Palacci said words to the effect of, "I can give you what the young guys cannot," and "You and I can have something." I refused to go to a hotel with Mr. Palacci.
10. Later that month, I again asked Mr. Palacci for a raise. Mr. Palacci again denied my request and indicated to me that if I would have agreed to have sex with him, I would have received a raise.
11. Mr. Palacci also told me that he hated Dominicans and that we were trash, thieves, and shit.
12. Mr. Palacci made the working conditions at the stores so difficult and unpleasant that I felt compelled to stop working at the stores. On or about October 25, 2003, I stopped working at the stores.
13. By the conduct described herein, I believe that I was subjected to gender discrimination.
14. The foregoing is a brief summary of my experiences and is not intended to be an exhaustive account.
15. 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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Angela Berise Peralta Fritman