

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**RENEE CASSARD,**

**Plaintiff,**

**vs.**

**OMNICOM MEDIA GROUP HOLDINGS  
INC., OMNICOM GROUP, INC., OMD  
USA LLC, AND RALPH PARDO,**

**Defendants.**

Civil Action No.

**COMPLAINT**

**PLAINTIFF DEMANDS  
A TRIAL BY JURY**

Plaintiff, RENEE CASSARD (“Plaintiff”, “Renee Cassard”, “Ms. Cassard”) by her attorneys, MESIDOR PLLC, hereby complains of the Defendants OMNICOM MEDIA GROUP HOLDINGS (“Omnicom Media Group”), OMNICOM GROUP, INC., and OMD USA LLC (“OMD USA”) (Collectively “Omnicom”) and Ralph Pardo (“Pardo”) (collectively “Defendants”), upon information and belief, as follows:

**NATURE OF THE CASE**

1. The experience of working under Ralph Pardo, particularly for women over 40, was one of systemic marginalization and disrespect. From Renee Cassard's initial meeting in June 2022, where her content was dismissed and her departure questioned, a pattern of devaluation was evident. This was not an isolated incident. Senior women, such as Catherine Sullivan, were ignored during crucial transitions, and Chrissie Hanson faced unwarranted scrutiny. Pardo's actions extended beyond mere exclusion; he appropriated women's work, using Jennifer Villany's business plan for a healthcare unit to recruit a male counterpart. His remarks were overtly misogynistic, from suggesting Jenn Rodis manage a beauty account to dismissing Amanda

Wallace's career due to her childcare responsibilities. When Mia Salibello facilitated a requested team transition, Pardo publicly humiliated her, leading to her termination. Cassard's own experience included exclusion from strategic initiatives, ignored contributions, and a degrading demotion where her capabilities were questioned and her location disparaged. This constant stress led to diagnosed health issues. Her formal complaint was met with inaction for 109 days, followed by superficial PR efforts rather than genuine change. Retaliation was swift: exclusion from meetings, unreasonable deadlines, and the shutdown of key initiatives. Her eventual dismissal, framed as a 'strategic restructuring,' mirrored the 'silent terminations' of other senior women, revealing a clear pattern of eliminating experienced women. Unlike male colleagues, she received no transition or new role. The company's failure to address these issues and the subsequent retaliation demonstrated a clear disregard for the contributions and experience of women over 40.

2. Renee Cassard brings this action alleging that Defendants engaged in unlawful gender and age discrimination with respect to her employment at Omnicom in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, et seq. ("Title VII"), as amended, The Age Discrimination in Employment Act, 29 U.S.C. §§ 621 et seq. ("ADEA"), The New York State Human Rights Law, N.Y. Exec. Law §§ 290, et seq. ("NYSHRL"); the New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101, et seq. ("NYCHRL"), as well as for violation of the New York Labor Law ("NYLL") § 740.

### **JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332 as the parties are citizens of different states and/or have principal places business in different states, complete diversity exists and the amount in controversy exceeds \$75,000. This Court has

supplemental jurisdiction over Plaintiff's related claims arising under state and local law pursuant to 28 U.S.C. § 1367(a).

4. Because Omnicom resides in this judicial district, venue is proper pursuant to 28 U.S.C. § 1391(b). Additionally, venue is proper because a substantial part of the events or omissions giving rise to the claim occurred in this judicial district.

#### **ADMINISTRATIVE PREREQUISITIES**

5. On or about March 10, 2025, Plaintiff filed a charge of discrimination with the Equal Employment Opportunity ("EEOC").

6. Plaintiff requested a Notice of Right to Sue and will seek leave to amend this action to add claims under Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* and the Age Discrimination in Employment Act, 29 U.S.C. §§ 621 *et seq.*

7. The facts set forth herein support those claims as well, and therefore there will be no prejudice to Defendants by this procedure.

#### **PARTIES**

8. Plaintiff is an individual residing in Fort Mill, South Carolina.

9. At all relevant times, Plaintiff was an employee as defined by applicable federal, state, and local laws.

10. Upon information and belief, Omnicom is a global advertising, marketing, and corporate communications company with a principal place of business and/or headquarters located at 195 Broadway, New York, New York 10007.

11. During the relevant time period, Omnicom hired and had over 75,000 employees worldwide.

12. At all relevant times, Omnicom was an employer as defined by applicable federal, state, and local laws.

13. At all relevant times, Defendant Ralph Pardo was or is the Chief Executive Officer of Omnicom North America and an employer under applicable federal, state, and local laws.

14. At all relevant times, Defendant Pardo was a supervisor or had supervisory authority over Plaintiff Cassard.

15. Upon information and belief, Defendant Pardo resides in the State of New York.

### **MATERIAL FACTS**

16. In 2011, Plaintiff Renee Cassard began working at Omnicom as the U.S. Director of Research and Analytics.

17. Plaintiff, a 49-year-old female marketing and research executive with over 20 years of experience, excelled at Omnicom and was accordingly promoted several times. She received a number of merit bonuses throughout her tenure at Omnicom because of her exceptional performance.

18. After receiving promotions to different roles at Omnicom, in January 2021, Ms. Cassard was promoted to the position of Chief Research Officer.

19. As Chief Research Officer, Plaintiff was responsible for a diverse array of tasks, including but not limited to driving consumer-centric products that leveraged sentiment and behavioral data, engaging directly with hundreds of clients, expanding the skill set of her team to include two additional disciplines of data science and research analytics, and facilitating the merger of a third-party syndicated research department with primary research. She also engaged in a multitude of projects, including conceiving of and launching the proprietary survey platform, OMG Signal, which connected to Omnicom's hands-on keyboard media planning and

orchestration platform, as well as building attitudinal data set for the company's platform, expanding upon its preexisting capabilities.

20. Ms. Cassard performed her job exceptionally well throughout her tenure at Omnicom. In every role Plaintiff held at Omnicom she consistently exceeded all expectations, going above and beyond the scope of her role to maximize the Company's success.

21. For example, in her former role as Chief Research Officer, Ms. Cassard received praise and accolades from individuals in the most senior data science roles at Omnicom's sister company, Annalect, for her work on the attitudinal data set expansion, and went on to develop 19 different attitudinal datasets for Omnicom by the end of 2023. This work was projected to generate over \$600,000 in passive CPM revenue in 2024 alone.

22. Despite consistently exceeding the Company's performance expectations, Ms. Cassard began to face increasing discriminatory treatment based on her age and gender, after Defendant Ralph Pardo ("Mr. Pardo") became the Chief Executive Officer of Omnicom North America in or around March 2022.

23. Mr. Pardo was known in the office for being both sexist and misogynistic. He consistently subjected Plaintiff to discriminatory treatment because of her age and gender.

24. Mr. Pardo made offensive comments to Plaintiff regarding women, her appearance, and the like. Mr. Pardo routinely excluded Plaintiff from meetings, refused to manage or supervise Plaintiff's work and consistently treated her differently than her male and younger counterparts at Omnicom.

25. During one incident on June 8, 2022, Ms. Cassard gave a presentation on the work of her team related to the OMG Signal Project. After Ms. Cassard's presentation, Mr. Pardo waited for the other employees to leave and made clear references to Ms. Cassard's age, asking when she

was going to leave her position due to her being “so senior.” Mr. Pardo made this presumptuous and discriminatory comment despite Plaintiff’s considerable success in her role and lack of any declared or actual intent to leave her position or retire.

26. While the former CEO regularly invited Plaintiff to leadership meetings, Defendant Pardo excluded Plaintiff from all but one leadership meeting, and from all quarterly North American Leadership meetings for the Company, including but not limited to on or about May 5, 2022, September 29, 2022, March 23, 2023, June 14, 2023, August 1, 2023, and December 5, 2023.

27. In contrast, Plaintiff’s male counterparts, including the Managing Director of Social Activation, Senior Vice President of Marketplace Intelligence and Chief Investigating Officer, were invited to attend nearly all the aforementioned meetings.

28. Mr. Pardo would consistently and arbitrarily uninvite Plaintiff from these meetings despite her position as a C-Suite executive and after having her prepare materials to present at those meetings. This deprived Plaintiff of visibility in the significance of her role, valuable networking opportunities and impeded her ability to perform her role effectively and efficiently.

29. In June 2022, Mr. Pardo asked Plaintiff to create a presentation showcasing OMG Signal and OMG research for an upcoming Town Hall in September. After Plaintiff finished creating these materials, Mr. Pardo’s Chief of Staff, Ms. Jennifer Villany, informed Plaintiff that the agenda for the Town Hall was full, and that Plaintiff would not be able to present. This presentation was never reviewed, and Plaintiff was never included or invited to subsequent Town Hall meetings.

30. Defendant Pardo also refused to meet with Plaintiff and would either ignore or not arrive for scheduled meetings. Further, he did not provide quarterly leadership updates for Plaintiff, which he prepared for Plaintiff's younger and male peers.

31. Mr. Pardo frequently demeaned Plaintiff's intellectual competence and insulted her on multiple occasions on the basis of her age and gender.

32. For example, on or about November 23, 2022, Plaintiff was presented with an agreement letter to receive access to Restricted Stock Units (RSUs) which were previously provided months prior, the agreement letter contained numerous highly restrictive provisions. Due to the biased comments Mr. Pardo previously made, Plaintiff was concerned about the longevity of her time at Omnicom. Relatedly Plaintiff to decline the RSUs and not sign the agreement letter.

33. In response, Defendant Pardo insinuated that Ms. Cassard misunderstood the letter, and offered to facilitate a conversation with Omnicom's lawyers. Ms. Cassard understood the provisions of the letter agreement and its restrictions. Nevertheless, Defendant Pardo failed to follow through on this offer.

34. Mr. Pardo's suggestion that Ms. Cassard did not understand the RSUs letter was demeaning and patronizing, and he not have insinuated that a male counterpart's decision not to sign was due to a lack of understanding.

35. On or about March 1, 2023, when discussing raises for Plaintiff's team with the Chief Operating Officer ("COO") Mr. John Swift, Plaintiff informed him that her direct report, Ms. Pam Marsh, who served as Executive Director of Primary Research, was raise eligible and deserving of a raise. During this conversation, Mr. Swift asked Mr. Marsh's age, which Plaintiff found to be irrelevant. However, Plaintiff disclosed that she was 58 years old. Mr. Swift stated that she was "close to retirement" and she was "not going anywhere" and instructed Plaintiff to inform

Ms. Marsh that her salary was “capped”, and she would never receive a raise again regardless of her performance.

36. In or about September 2023, Plaintiff approached Mr. Swift again regarding Ms. Marsh’s positive performance and the possibility of a raise, to which he reiterated that she had “hit her cap” and no raises would be approved.

37. This deeply upset Plaintiff, who felt it was inappropriate and illegal to use Ms. Marsh’s age to justify denying her a raise.

38. Upon information and belief, Omnicom did not use the age of male colleagues as a basis for determining their eligibility for raises.

39. On or about September 13, 2023, Mr. Pardo called Plaintiff for an impromptu meeting and informed her that she would no longer report to him but would report to the Chief Activation Officer, Ms. Megan Pagliuca, who was at the time Plaintiff’s peer.

40. Mr. Pardo explained that he believed Plaintiff’s function was in a “silo” and that this new reporting structure would bring her product offering closer to clients.

41. Ms. Cassard expressed concerns over reporting to a peer and pointed out the lack of strategic alignment.

42. Ms. Pagliuca had or has an expertise in investment and activation, while Ms. Cassard focused on strategic and consumer -centric research functions.

43. This realignment was impractical and essentially constituted a demotion.

44. Mr. Pardo’s repeated and pointed refusal to familiarize himself with Plaintiff and her team’s accomplishments contributed to his lack of understanding in this area.



45. Mr. Pardo then insultingly stated that Plaintiff's team could not be a "helpdesk" and asked Plaintiff to "name one pitch [where Plaintiff's team's product] has been a differentiator to winning the business."

46. Ms. Cassard shared four instances in response and requested an opportunity to further present her team's accomplishments. However, Mr. Pardo ignored her response and request.

47. Despite Mr. Pardo's assertion that he did not have time to manage Ms. Cassard of her team, he consistently managed Ms. Cassard younger and male counterparts.

48. As a result of the aforementioned distressing meeting and the discriminatory treatment Mr. Pardo and Omnicom subjected Ms. Cassard to, Ms. Cassard suffered a severe ocular migraine.

49. Approximately one week later, Ms. Cassard met with Mr. Swift, for a one-on-one. As this meeting, Mr. Swift spoke to Plaintiff "off the record" regarding her reaction to the news of her demotion.

50. Mr. Swift advised Plaintiff not to take the discriminatory demotion as a "bad thing" because Ms. Pagliuca "has Mr. Pardo's respect."

51. Mr. Swift's response insinuated that Mr. Pardo did not share a similar respect for Ms. Cassard and her work.

52. Mr. Swift also disclosed to Plaintiff that Mr. Pardo had told him that he was not certain who she reported to, and that he does have the time or bandwidth to manage her team.

53. Mr. Swift then stated that Plaintiff "need[s] to decide if [she] wants to work for [Ms. Pagliuca]" subsequently stating that he himself would not if placed in Plaintiff's position.

Mr. Swift also asked Ms. Cassard “why are you still here” to which she replied that she believed her product to be a success and that she enjoyed her job.

54. Ms. Cassard repeatedly received similar unprompted and offensive questions regarding why she was still working at Omnicom. Younger and male employees did not face these same questions.

55. Omnicom continued to diminish Plaintiff’s role and subject her to disparate treatment compared to younger and male employees.

56. Mr. Pardo and Ms. Pagliuca continued to exclude Plaintiff from leadership meetings and repeatedly ignored or shut down any ideas or suggestions she proposed, diminishing Plaintiff’s role without any legitimate or justifiable reason.

57. Ms. Cassard eventually gained the courage to speak up about and report Mr. Pardo’s discriminatory treatment. Unfortunately, Omnicom then began retaliating against Ms. Cassard almost immediately.

58. On January 2, 2024, Plaintiff directly emailed Omnicom General Counsel, Mr. Eric Meyerowitz, outlining several concerns discussed herein, inter alia, regarding Mr. Pardo’s age and gender – based discriminatory treatment toward her before and after her demotion.

59. Ms. Cassard also noted that Mr. Pardo had engaged in a pattern of discriminatory and adverse treatment against female employees and older female employees, causing significant turnover at the Company.

60. Plaintiff urged Omnicom to investigate her concerns.

61. Ms. Cassard later shared her concerns regarding Mr. Pardo’s discriminatory treatment towards her with the Global Chief Talent Experience Officer, Ms. Kate King.

62. On January 19, 2024, Ms. King and Plaintiff met and Plaintiff shared her concerns regarding the age and gender discrimination Mr. Pardo and others subjected her to in detail.

63. This discussion included but was not limited to Mr. Pardo's comment about Plaintiff's seniority and when she would leave the company, Mr. Pardo's exclusionary and marginalizing treatment towards Plaintiff compared to younger and male counterparts, Mr. Pardo insulting her intelligence, the lack of performance reviews or merit increases she received under Mr. Pardo's leadership, her demotion, and Mr. Pardo's pattern of discrimination against older female employees at Omnicom.

64. Ms. Cassard also shared that her work environment felt hostile, terrible, and unsafe.

65. Ms. Cassard was assured that an investigation would be conducted, and that Omnicom would take appropriate action.

66. After Ms. Cassard met with Ms. King, she received no update regarding the status of the investigation or its findings.

67. Instead, Omnicom began to retaliate against Plaintiff.

68. First, on January 25, 2024, less than two weeks after Plaintiff's conversation with Ms. King, Plaintiff's role under Ms. Pagliuca was further diminished when she was informed that a crucial role on her team, Data Scientist, which Ms. Pagliuca approved prior to her complaint, would not be back filled.

69. Plaintiff was then advised that she should eliminate two additional employees due to the diminished role of her team.

70. Ms. Pagliuca stated that the reason for these changes was because her team was "doing less." However, Ms. Pagliuca had limited awareness of Plaintiff's team's work, which was made more difficult by the lack of clear direction from the Company.

71. Ms. Pagliuca subsequently asked Ms. Cassard to speak with a male direct report of Plaintiff's, Mr. Justin Greenberg, due to his "ambition" and the potentially "demoralizing" nature of the changes described above.

72. Ms. Pagliuca did not express similar concern for ambitious female direct reports.

73. Ms. Pagliuca stated that while no additional changes would happen on Plaintiff's team for the following three months, Plaintiff could expect more changes thereafter. There was an ominous tone to these comments, appearing to indicate that Plaintiff's role was in jeopardy due to her complaints of discrimination.

74. On or about March 6, 2024, Plaintiff discovered that Ms. Pagliuca was making significant efforts to gather negative feedback about Plaintiff to create a pretext to terminate Plaintiff's employment. Ms. Pagliuca informed Plaintiff that 4 out of 5 employees reported that Plaintiff was unavailable for meetings in the morning. This came as a surprise to Plaintiff who then tried to rectify any concerns. Plaintiff eventually found out during that only one direct report stated that she was unavailable in the mornings. Ms. Pagliuca intentionally exaggerated this negative feedback in retaliation against Plaintiff for her complaint of discrimination. Plaintiff still made herself available to her direct reports by holding periods of time open for "office hours" and being responsive as she had always been.

75. On or about March 19, 2024, during a Town Hall leadership meeting, Mr. Pardo asked how many people received his memorandum regarding International Women's Day and the Company's "commitment to inclusivity." During the Town Hall, the Head of Talent, Ms. Diana Blacone, discussed statistics related to women in leadership at Omnicom.

76. On or about March 20, 2024, Mr. Pardo sent a follow-up memorandum highlighting the Company's increase in female hires to senior positions. However, he omitted the high attrition rate of older women employees in these roles.

77. On April 28, 2024, Ms. Blancone made a LinkedIn post claiming that Mr. Pardo values DE&I as part of the Company's culture and not just as "buzzwords." Despite these assertions, the Company never took any action to address Plaintiff's concerns about gender and age discrimination.

78. At this time, Plaintiff had still not been contacted about her formal complaint, and these buzzwords and assertions were insulting as they bore no reality in the company's practice.

79. On May 13, 2024, after thirteen years of dedication, tireless work, and success in every role Plaintiff held at Omnicom, the Company terminated Plaintiff's employment through a virtual meeting that lasted about eleven minutes. In a call with Ms. Pagliuca and a human resources representative, Plaintiff was told that Ms. Pagliuca made the "organizational decision to eliminate the need for a consumer research leader." Plaintiff inquired about Mr. Pardo's role in the decision, to which Ms. Pagliuca affirmed he had approved it through proper procedures but otherwise was unable to provide a clear answer. Plaintiff was offered five (5) months of severance and was not provided with any time or ability to speak with her team or say goodbyes after 13 years of dedication to the company.

80. Upon information and belief, Omnicom has a pattern of engaging in discriminatory treatment against its woman employees who are or who are approximately over 40 years of age.

81. For example, in *Salibello v. Omnicom Media Group Holdings Inc. and OMD USA LLC* (Civil Case No.: 1:24-cv-04937) Ms. Salibello contended that she was subjected to a pattern of systematic gender and age discrimination. Omnicom, under Mr. Pardo's leadership has

repeatedly and recently terminated the employment of female executive employees at the Company who are over the age of 40, further evidencing the Company's pattern of age and gender discrimination.

82. Additionally, upon information and belief, several other senior women employees who are over 40 years of age were pushed terminated by Defendants. For example, Jennifer Villany, a former Omnicom Chief of Staff, CEO for Omnicom North America was 52 years of age when she was terminated from Omnicom in 2023, while the Company was under Mr. Pardo's leadership. Kate O'Brien, Resolution/H&S Lead was in her late forties (40s) when she was terminated from the Company in 2023. Upon information and belief, in terminating Ms. O'Brien Mr. Pardo stated, "This is all on you, it's hard to terminate a female." Regan White, who worked in HR, was also in her late forties when she was terminated from the Company in 2022. Catherine Sullivan, CEO and PhD was in her fifties ("50s") when she was terminated from Omnicom. Tracy Roarke, who worked at Omnicom as a Lead PhD, was in her late 40s when she was terminated from Omnicom. Mandy Wallace, former CEO of OMD, upon information and belief, was over forty when she was terminated from Omnicom in 2023. Upon information and belief, Mr. Pardo advised Ms. Wallace that because she has a small kid, she should stay at home before her termination from the Company. Jenn Rodis, Executive Director, WB was in her forties when she was terminated from Omnicom.

83. Upon information and belief, none of the aforementioned women former Omnicom employees had performance issues or were otherwise justifiably terminated, rather they were terminated because Defendants engaged in a pattern of forcing older women employees out of the company without adequate or lawful reason or justification.

**AS A FIRST CAUSE OF ACTION**

*(Age and Gender Discrimination in Violation of the New York State Human Rights Law)*

84. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if same were set forth herein fully at length.

85. The New York State Executive Law § 296(1)(a) provides in pertinent part:

It shall be an unlawful discriminatory practice: For an employer or licensing agency, because of an individual's **age**, race, creed, color, national origin, sexual orientation, military status, **sex**, disability, predisposing genetic characteristics, familial status, marital status, or domestic violence victim status, to refuse to hire or employ or to bar or to discharge from employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment.

86. Defendants violated this section by subjecting Plaintiff to discriminatory and disparate treatment as described herein. Further, Defendants discriminated against Plaintiff because of her sex and age as described herein and evidenced by the adverse actions it took against Plaintiff by demoting and ultimately unlawfully terminating Plaintiff's position of employment.

87. Defendants knowingly and intentionally discriminated and retaliated against Plaintiff because of her age and sex as described herein.

88. As a direct and proximate result of Defendants' discrimination in violation of Executive Law § 296(1)(a), Plaintiff suffered, and continues to suffer, monetary losses, including but not limited to loss of past and future income, compensation, and benefits, for which she is entitled to an award of monetary damages and other relief.

89. As a direct and proximate result of Defendants' discrimination in violation of Executive Law § 296(1)(a), Plaintiff suffered, and continues to suffer, severe mental anguish and emotional distress, including but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages.

**AS A SECOND CAUSE OF ACTION**

(For Retaliation under the New York State Human Rights Law and NYLL Section 740)

90. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if same were set forth herein fully at length.

91. New York State Executive Law § 296(7) provides that it shall be an unlawful discriminatory practice: “For any person engaged in any activity to which this section applies to retaliate or discriminate against any person because he has opposed any practices forbidden under this article.”

92. Defendants violated this section as set forth herein.

93. Defendants violated this section by subjecting Plaintiff to adverse action after Plaintiff complained of the discrimination she was subjected to at Omnicom.

94. Defendants violated New York Labor Law, *as amended*, §§ 740 (2)(a) and New York Labor Law, *as amended*, §§ 740 (2)(c) (“NYLL”), by, *inter alia*, by subjecting Plaintiff to adverse action after she reported the discrimination to which Omnicom subjected her.

95. Plaintiff is entitled to emotional distress damages, compensatory damages, economic damages, punitive damages, attorney’s fees, and costs.

**AS A THIRD CAUSE OF ACTION**

(Age and Gender Discrimination in Violation of the New York City Human Rights Law)

96. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if same were set forth herein fully at length.

97. The Administrative Code of the City of New York § 8-107(1) provides that it shall be an unlawful discriminatory practice: (1) For an employer or an employee or agent thereof, because of the gender, age, sexual and reproductive health decisions, and actual or perceived...disability...of any person, to refuse to hire or employ or to bar or to discharge from



employment such person, or to or to discriminate against such person in compensation or in the terms, conditions, or privileges of employment.

98. Plaintiff is a woman and over 40 years of age and therefore a member of protected classes.

99. Defendants violated this section by subjecting Plaintiff to discriminatory and disparate treatment as described herein.

100. Further, Defendants discriminated against Plaintiff because of her sex and age as described herein and evidenced by the adverse actions it took against Plaintiff by demoting and ultimately unlawfully terminating Plaintiff's position of employment.

101. Defendants knowingly and intentionally discriminated and retaliated against Plaintiff because of her age and sex as described herein.

102. As a direct and proximate result of Defendants' discrimination, Plaintiff suffered, and continues to suffer, monetary losses, including but not limited to loss of past and future income, compensation, and benefits, for which she is entitled to an award of monetary damages and other relief.

103. As a direct and proximate result of Defendants' discrimination, Plaintiff suffered, and continues to suffer, severe mental anguish and emotional distress, including but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages.

**AS A FOURTH CAUSE OF ACTION**  
*(Retaliation in Violation of the New York City Human Rights Law)*

104. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint as if same were set forth herein fully at length.

105. The Administrative Code of the City of New York § 8-107(7) provides in relevant part that it shall be an unlawful discriminatory practice for person engaged in any activity to which this chapter applies to retaliate or discriminate in any manner against any person because such person has (i) opposed any practice forbidden by this chapter.

106. Defendants violated this section as set forth herein.

107. Defendants violated this section by subjecting Plaintiff to adverse action after Plaintiff complained of her discrimination.

108. As a direct and proximate result of Defendants' conduct and retaliation, Plaintiff suffered and continues to suffer monetary losses, mental anguish and emotional distress, for which she is entitled to an award of monetary damages.

109. As a direct and proximate results of Defendants' discrimination, Plaintiff is entitled to compensatory damages, punitive damages, and attorney's fees and costs.

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests a judgment against Defendants:

- A. Declaring that Defendants participated in unlawful employment practices prohibited by the NYSHRL, NYCHRL, and NYLL in that Defendants discriminated against Plaintiff on the basis of her sex and age;
- B. Awarding damages to Plaintiff for all lost wages and benefits resulting from Defendants' unlawful discrimination, and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices;
- C. Awarding Plaintiff compensatory damages for mental, emotional and physical injury, distress, pain and suffering and injury to her reputation in an amount to be proven;
- D. Awarding Plaintiff punitive damages;

- E. Awarding Plaintiff attorneys' fees, costs, disbursements, and expenses incurred in the prosecution of the action;
- F. Awarding Plaintiff such other and further relief as the Court may deem equitable, just and proper to remedy the Defendants' unlawful employment practices.

Dated: New York, New York  
March 17, 2025

**MESIDOR PLLC  
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