

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented to: Agency(ies) Charge No(s):

FEPA
 EEOC

_____ and EEOC

State or local Agency, if any

Name (indicate Mr. Ms. Mrs.) Alicia Evans	Home Phone (Incl. Area Code) [REDACTED]	Date of Birth [REDACTED]
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Street Address _____ **City, State and ZIP Code** _____

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name Alvarez & Marsal	No. Employees, Members 10,000+	Phone No. (Include Area Code) 212-759-4433
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Street Address _____ **City, State and ZIP Code** _____
 600 Madison Avenue, New York, NY 10022

DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify below.)	DATE(S) DISCRIMINATION TOOK PLACE Earliest (ADEA/EPA) _____ Latest (All) _____
	<input type="checkbox"/> CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)):

See attached complaint.

[] I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY – When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLANANT

9/16/24
Date

[Signature]
Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NEW YORK DISTRICT OFFICE**

X

ALICIA EVANS,

Claimant,

- against -

ALVAREZ & MARSAL,

Respondent.

X

**EEOC CHARGE
OF DISCRIMINATION:
NARRATIVE STATEMENT**

Claimant Alicia Evans hereby alleges the following against Respondent Alvarez & Marsal in support of her claims of discrimination, harassment, and unlawful retaliation on the basis of her gender.

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

1. At all relevant times hereto, Charging Party Alicia Evans (“Charging Party” or “Ms. Evans”) has been a resident of the State of New York and the County of Westchester.

2. At all relevant times hereto, Alvarez & Marsal (“Respondent” or “A&M”) was and is a for-profit business maintaining its principal place of business at 600 Madison Avenue, New York, NY 10022.

3. Upon information and belief, Respondent employs approximately 10,000 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Charging Party is proceeding herein.

4. At all relevant times hereto, Charging Party was an employee of Respondent.

Material Facts

5. In 1994, Charging Party earned her B.A. in Business Administration from Virginia State University.
6. After graduation, she built extensive expertise in finance, holding key managerial positions at companies such as Medidata Solutions, Inc., Intralinks, Inc., and Tarte Inc.
7. Throughout her career, Charging Party has consistently demonstrated strong leadership and analytical skills, driving success in numerous high-profile projects.
8. At Tarte Inc., she notably transformed the finance department by automating processes and establishing comprehensive policies and procedures, significantly enhancing operational efficiency.
9. In September 2018, Charging Party joined A&M as an Accounts Payable Manager, bringing over a decade of specialized experience to A&M.
10. Tasked with overseeing a team spread across Tampa, Florida, and New York City, Charging Party quickly proved herself to be an asset to A&M.
11. From the outset, it was made clear to Charging Party that the Accounts Payable Supervisor, Daniel Trujillo, had fallen short of expectations, and that Charging Party was hired specifically to address those deficiencies.
12. Encouraged to be a “vocal advocate” for necessary change, Charging Party did exactly that.
13. From day one, she proved to be an indispensable asset, driving improvements and elevating A&M’s performance.
14. Shortly after Charging Party started, she identified critical issues within A&M.

15. Despite A&M's rapid growth, the Accounts Payable team remained understaffed, forcing Charging Party and her team to handle an overwhelming workload while attempting to revamp A&M's antiquated systems.

16. In or around October 2018, Charging Party voiced her concerns to Robert Wilson, former Controller of Operations and her manager.

17. Charging Party made it unequivocally clear to Mr. Wilson that for her team to succeed, A&M needed to reinvest in its operating systems.

18. Charging Party explained that her team was hindered by the inefficiencies of using two systems—Unit 4 Agresso and Concur.

19. She advocated for a transition to Workday Financials, a superior system that would enable Charging Party and her team to scale effectively alongside A&M's rapid growth.

20. Mr. Wilson, however, disregarded Ms. Evans's concerns and expertise and renewed the contract for the existing systems without addressing any of the issues she raised.

21. Despite the lack of support from A&M leadership, Charging Party remained a "vocal advocate" for change in the months that followed.

22. Year after year, Charging Party received substantial raises and bonuses.

23. In 2021, Charging Party received a \$3,000 raise and a \$15,000 bonus, in 2022, Charging Party received a \$7,000 raise and a \$17,000 bonus, and in 2023, Charging Party received a \$4,000 raise and an \$18,000 bonus.

24. As Charging Party continued to voice concerns about A&M's systems and the lack of support for her team, Mr. Wilson began directing increasingly hostile behavior toward her.

25. For example, in or around July 2023, Mr. Wilson called Charging Party on Microsoft Teams and berated her, yelling that everything she was doing was a “**fucking mess.**”

26. When Charging Party attempted to engage with him, Mr. Wilson cut her off, insisting that she “**just needed to be quiet and listen.**”

27. Charging Party was shocked by Mr. Wilson’s outburst, which not only undermined her but also revealed Mr. Wilson’s deep-seated misogyny.

28. Charging Party never witnessed Mr. Wilson treat her male colleagues this way.

29. Mr. Wilson’s demand that Charging Party remain silent while he berated her was a blatant attempt to assert his dominance and diminish her voice.

30. Charging Party felt that this hostility was a direct response to her gender and ongoing advocacy for change within A&M, as Mr. Wilson’s behavior reflected a disturbing disregard for her simply because she challenged the status quo.

31. Nevertheless, Charging Party consistently demonstrated exceptional leadership and expertise at A&M.

32. For example, in or around May 2023, it was decided that all finance functions for India would be transitioned from Corporate Finance to a newly hired team in India.

33. Mr. Wilson entrusted Charging Party with the critical task of training and overseeing this process.

34. Charging Party meticulously ensured that each team member had the proper system access to handle Accounts Payable and Accounts Receivable, personally testing their permissions and setting up a comprehensive training schedule.

35. Over the course of two months, Charging Party led regular training sessions and continued to provide support long after the initial transition.

36. Her efforts were highly successful, as evidenced by the Finance Operational Leader in India, Ritu Lakhoshi, who praised Charging Party in an email to Mr. Wilson for her outstanding communication and unwavering support throughout the process.

37. The success of this transition was so significant that the leadership team in India promoted their local Finance Operational Leader to Finance Controller for India, a testament to the solid foundation Charging Party had helped establish.

38. It was clear that Charging Party was not only good at her job but excelled in it, even while facing ongoing challenges from Mr. Wilson.

39. In or around August 2023, Human Resources (“HR”) distributed its annual Companywide culture survey, intended to assess employee satisfaction, gather feedback on workplace practices, and identify areas for improvement in A&M’s work environment.

40. Around the same time, Steven Cohn, Chief Finance Officer, sent a survey to employees in the finance department, which included Ms. Evans.

41. The survey results revealed that women at A&M, particularly within the finance department, were significantly less satisfied with A&M culture compared to their male colleagues.

42. In response, Mr. Cohn established a committee to address these concerns, appointing Deborah Murray, Global Director of Internal Audit, and Carol Grimmond, Director of Global Payroll, to lead the initiative.

43. All women in the finance department were invited to join the committee, ensuring their voices would be integral in shaping the necessary improvements.

44. In or around August 2023, the Committee held its inaugural meeting, inviting all women in the finance department to share their experiences at A&M.

45. Attendees were assured that their feedback would remain confidential.
46. During the meeting, participants highlighted significant concerns, including limited promotion opportunities, an unacceptable work-life balance, and insufficient management support within the finance department.
47. Trusting in the promise of anonymity, Charging Party candidly shared her experiences.
48. She pointed out a clear disparity in opportunities between men and women at A&M, noting that her repeated requests for promotions and title changes for her team were met with resistance and dismissiveness.
49. Charging Party expressed a need for greater respect and equal opportunities compared to her male colleagues.
50. Although she did not directly name Mr. Wilson, it was clear to all present that he was the focus of her comments, given he was her manager.
51. Additionally, Charging Party proposed a “reverse review” system, allowing finance department members to evaluate their supervisors.
52. By the end of the meeting, there was a strong consensus on the urgent need to address the significant issues identified within the finance department.
53. Following the meeting, Mr. Cohn implemented a “reverse review” for the finance department employees.
54. As with the Committee meeting, employees were assured that their feedback would remain anonymous.

55. In her review of Mr. Wilson, Charging Party acknowledged his competence in his role but described him as a poor manager, highlighting significant concerns about his management style.

56. Despite A&M's assurances of anonymity, following the Committee meeting and reverse review, Mr. Wilson began retaliating against Ms. Evans.

57. On or around September 28, 2023, during Ms. Evans's annual performance review, Mr. Wilson berated Ms. Evans, shouting, **"What the hell is going on with you," "You are running a shitshow,"** and **"You are not a good manager and lack management skills."**

58. Charging Party was taken aback by Mr. Wilson's fabricated attacks.

59. Indeed, before her review, Charging Party had never received negative feedback on her work at A&M.

60. Charging Party attempted to correct Mr. Wilson's criticisms of her, but he would not listen to her and continuously talked over her.

61. Finally, at the end of the review, Charging Party asked Mr. Wilson why he was yelling at her and why she was getting a bad review.

62. Instead of providing Charging Party with any information to back up his attacks, Mr. Wilson offered to change Ms. Evans's performance review.

63. Charging Party was perplexed. Indeed, if Mr. Wilson's performance review was true, then why would he be offering to change it for her? It was clear that Mr. Wilson had fabricated Ms. Evans's review.

64. In the months that followed, Charging Party grew increasingly fearful of Mr. Wilson and made every effort to avoid him.

65. Despite her attempts to steer clear, Mr. Wilson continued to find ways to berate and harass her, deliberately ignoring her successes.

66. In or around February 2024, during a goal-setting meeting to discuss Ms. Evans's objectives for the year, Mr. Wilson offered no constructive feedback or mentorship.

67. Instead, he criticized her performance, claiming it was below expectations and stating that **“this shit”** needed to stop.

68. When Charging Party requested specific details on how she could improve, Mr. Wilson dismissively responded that he wasn't going to tell her how to do her job.

69. It was clear that he had no real feedback to offer; his intent was simply to belittle and demean her under the guise of a performance review.

70. This encounter further underscored not only Mr. Wilson's ongoing hostility but also the underlying misogyny towards the women at A&M.

71. Mr. Wilson's refusal to provide constructive support and his subsequent actions reflected a broader pattern of undermining Ms. Evans, rooted in a fundamental disregard for her as a woman asserting her voice within A&M.

72. This was a clear example of retaliation for her outspoken advocacy for change at A&M.

73. On June 10, 2024, Rob Wilson abruptly called Charging Party and terminated her employment.

74. After six years of dedicated service at A&M, Respondent claimed they were “going in a new direction” and intended to hire someone based in Tampa, Florida, to supervise her team.

75. Charging Party was completely blindsided by this decision, as she had been a stellar employee throughout her tenure.

76. It was painfully clear to Charging Party that her termination was not due to her performance, but rather because she had been an outspoken advocate for change, challenging Mr. Wilson's behavior and standing up for the rights of women within A&M.

77. Despite her determination to remain optimistic about her career, the ruthless discrimination and retaliation Charging Party has suffered at A&M has rendered her distraught and crestfallen.

78. Indeed, Ms. Evans's emotional distress is clear and cognizable given the reality that A&M has allowed Mr. Wilson to press his unlawful campaign against Ms. Evans without repercussion.

79. It is clear from the foregoing that Respondent has engaged in unlawful discrimination on the basis of Charging Party's gender in violation of Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166 ("Title VII") and the New York State Human Rights Law, New York State Executive Law, §§ 296 *et seq.* ("NYSHRL").

80. As a result of the foregoing, Charging Party has been and continues to be unlawfully discriminated against, humiliated, and degraded, and thus has suffered loss of rights, severe emotional distress, loss of income and earnings and possible damage to her professional reputation.

81. As a result of Respondent's actions, Charging Party feel extremely degraded, victimized, embarrassed, and emotionally distressed.

82. Because of Respondent's actions that have been malicious, willful, outrageous, and done with knowledge of the legion of the contrary, Charging Party demands punitive damages against Respondent.

83. Respondent's flagrant disregard of the above-referenced laws—including those not enforced by the EEOC—evidences a pattern and practice of discrimination and retaliation that falls squarely within the EEOC's investigatory and enforcement statutory mandates to investigate, and enforce prohibitions against, discriminatory conduct in the workplace.