

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

CASE NO.: 3:23-cv-383

JANE DOE #1,

Plaintiff,

vs.

CROWLEY MARITIME CORPORATION,
and JUAN EMILIO BLANCO,

Defendants.

SEX TRAFFICKING COMPLAINT AND DEMAND FOR JURY TRIAL

COMES NOW the Plaintiff JANE DOE #1, by and through her undersigned counsel, and hereby files this Complaint for damages and Demand for Jury Trial against Defendants CROWLEY MARITIME CORPORATION and JUAN EMILIO BLANCO.

JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343, because this action asserts violations of 18 U.S.C. § 1591, *et seq.*, and therefore raises federal questions regarding the deprivation of Plaintiff's rights. The Court has supplemental jurisdiction over Plaintiff's related claims arising under state law pursuant to 28 U.S.C. § 1367(a).

2. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this Court because a substantial part of the events or omissions giving rise to this action occurred in this District.

PARTIES

3. Plaintiff Jane Doe #1 (“Ms. Doe”) is a former employee of Crowley Maritime Corporation and a citizen and resident of the country of El Salvador. Ms. Doe is suing under a pseudonym to protect her privacy.

4. Defendant Crowley Maritime Corporation (“Crowley”) is a Delaware corporation with a principal place of business located in Jacksonville, Florida.

5. Defendant Juan Emilio Blanco (“Blanco”) is a former employee of Crowley Maritime Corporation and, upon information and belief, a citizen of the country of El Salvador.

FACTUAL ALLEGATIONS

I. October 2016: Ms. Doe is Hired by Crowley

6. Ms. Doe began working for Crowley in approximately October of 2016, when she was 30 years old.

7. Due to her talents, experience, and ability to speak both English and Spanish, Ms. Doe was hired by Crowley as an “onboarding coordinator” in Crowley’s “Inland Transportation Department,” also known as the “Inland Transportation Group,” or more commonly, the “Inland Department.”

8. The Inland Department had employees who were physically located within the United States as well as employees located outside of the United States, including employees in El Salvador.

9. Ms. Doe was hired to work in Crowley's office in San Salvador, El Salvador. Crowley maintains a large presence in El Salvador where it employs hundreds of workers through wholly owned subsidiaries. Crowley boasts it has more than 55 years' experience providing shipping and logistics services between El Salvador and the United States.

10. Throughout Ms. Doe's employment with the company, Crowley exercised direct control over its Inland Department employees in El Salvador from its headquarters in Jacksonville, Florida, including exercising final decision-making authority over hiring and terminating Inland Department employees within its El Salvador offices—including Ms. Doe.

11. Crowley hired Ms. Doe through Crowley Shared Services, S.A. de C.V.—one of Crowley's many wholly owned subsidiaries.

12. Upon information and belief, Crowley Shared Services, S.A. de C.V. is a wholly owned subsidiary of Crowley Corporate Services, Inc., a Delaware Corporation.

13. Upon information and belief, Crowley Corporate Services, Inc. is a wholly owned subsidiary of Crowley Maritime Corporation.

14. Upon information and belief, Crowley Maritime Corporation is a wholly owned subsidiary of the holding company Crowley Holdings, Inc.—a Delaware corporation.

15. The decision to hire Ms. Doe was made by Defendant Blanco and approved by former Crowley employee Jose Lopez, who worked at Crowley’s headquarters in Jacksonville, Florida in the United States.

16. Jose Lopez is a U.S. citizen who was employed by Crowley through one or more of its U.S. subsidiaries, including Crowley Logistics, Inc. According to Crowley employment records, Lopez was initially hired as an accountant. Lopez began working at Crowley in June of 2012 and stayed with the company until his “resignation” in 2018.

17. Ms. Doe’s direct supervisor within the Inland Department and the most senior member of the Inland Department in Crowley’s San Salvador office was Defendant Juan Emilio Blanco.

18. During the events described in this complaint, Defendant Blanco reported directly to Jose Lopez, and Jose Lopez reported to Crowley executive Bob Weist, who was Vice President (VP), North America Transportation.

19. According to Crowley employment records, Blanco was hired by Crowley in 2010 and worked for Crowley until he was fired on January 24, 2018 for reasons directly related to events described in this Complaint.

20. Blanco, Lopez, Weist and others in Crowley senior management referred to Crowley's Inland Department office in El Salvador as the Inland Department "Admin" team or the "Administration" team.

21. In his resignation letter dated June 26, 2018, which was sent to senior Crowley executives Tiffany King and Bob Weist, Jose Lopez thanked Crowley for giving him the opportunity to "*manag[e] the Admin department for Crowley...*"

22. By maintaining an office in El Salvador, Crowley benefitted financially by hiring talented, educated, English-speaking white-collar workers and then paying those workers only 10-20% of what the company would have been required to pay similarly skilled and qualified workers in the United States.

23. When Crowley hired Ms. Doe, the company paid her a salary of approximately \$8,000 per year.

24. From an operational perspective, Crowley did not distinguish between its Inland Department team members based on where they were physically located. For example, Crowley maintained company-wide, unified Human Resources and "Ethics" departments, processes, and databases that encompassed its workers located within the United States as well as its workers located in El Salvador.

25. Crowley also required Ms. Doe and all Inland Department team members in El Salvador to write emails exclusively in English. The only exceptions to Crowley's "English only" rule for Ms. Doe and other Inland Department team

members were when: 1) sending emails to, or communicating with, Human Resources (HR) in El Salvador; or 2) communicating with clients or partners in Puerto Rico who preferred to communicate in Spanish.

26. While working within Crowley's Inland Department, Ms. Doe's daily tasks included communications with Crowley's internal trucking and logistics brokers at Crowley headquarters in Jacksonville, Florida. She performed administrative tasks to assist these Crowley employees with facilitating the shipments of large volumes of cargo for Crowley's customers, including providing transportation and logistics services to the United States Department of Defense.

27. In her role as an "onboarding coordinator," Ms. Doe assisted with onboarding new truck drivers, renewing certificates with truck drivers, manually entering data into Crowley's data management systems, and other administrative tasks requested of her by Blanco, Lopez, or Crowley's transportation brokers.

28. After approximately 3 months at Crowley, Ms. Doe also began to index documents related to trucking shipments on behalf Crowley employees in the United States.

29. Ms. Doe worked for Crowley from approximately October of 2016 until approximately June of 2018. Around June of 2018 a close family member became ill, and Ms. Doe ended her employment at Crowley in order to care for her family

member. Before Ms. Doe left Crowley in 2018, she had been promoted to manager.

30. After her family member's health improved, Ms. Doe returned to work for Crowley. She was given a new position as an analyst and worked at Crowley again, until deciding to leave the company for the final time in January of 2020.

II. January 2023: Ms. Doe Learns a Former Co-Worker Has Filed a Lawsuit Against Crowley and Defendant Juan Emilio Blanco in the United States

31. In January of 2023, approximately three years after she quit her job at Crowley, Ms. Doe read a news report and then numerous social media posts regarding a lawsuit filed against Defendants Crowley Maritime Corporation and Juan Emilio Blanco by Vanessa Treminio, a former co-worker of Ms. Doe's within Crowley's Inland Department. Vanessa Treminio's amended complaint, Case No. 3:22-cv-174-MMH-PDB, pending in this Court against Defendants Crowley and Blanco, is attached hereto as "**Exhibit 1.**"

32. The news of Treminio's lawsuit and the details contained within Treminio's amended complaint were extremely disturbing and highly distressing to Ms. Doe. News reports of Treminio's lawsuit triggered deep emotional pain and trauma related to Ms. Doe's own horrific experiences with Defendants Crowley and Blanco, because Ms. Doe had also endured sexual abuse at Crowley and had also been sexually trafficked.

III. October 2016: As Ms. Doe Joins Crowley's Inland Department, Blanco Begins Subjecting Her to a Pattern of Extreme Sexual Harassment

33. As soon as she began working for Crowley, Defendant Juan Emilio Blanco began subjecting Ms. Doe, as well as other women in the Crowley office, to a pattern of extreme workplace sexual harassment. Blanco's conduct was severe and pervasive and fostered a hostile, abusive, and offensive work environment.

34. Crowley was aware of Blanco's abhorrent workplace behavior even before assigning Ms. Doe to his team. Shortly after she was hired, several members of the Inland Department told Ms. Doe that it was well known within Crowley that Blanco had been transferred to the Inland Department from Crowley's Procurement Department after several subordinates from his former department made complaints against him for workplace sexual misconduct.

35. Ms. Doe was also told that Blanco, who was married, had begun having an extra-marital affair with one of his subordinates in Crowley's Procurement Department, named Caro, which was a violation of Crowley policies that the company nonetheless tolerated.

36. However, because Blanco was a "star performer," and because of his ability to drive profits for Crowley, instead of terminating Blanco's employment with Crowley following multiple reports of workplace sexual misconduct, Crowley simply transferred Blanco to a new department.

37. While Blanco was leading the Inland Department team in El Salvador, Crowley continued to receive complaints from female employees regarding Blanco's sexually inappropriate and abusive conduct toward women who worked under him, and even from women who did not directly report to Blanco. However, Crowley did not take action to stop or prevent the sexually inappropriate and abusive conduct in the workplace.

38. For years, despite Crowley's knowledge that Blanco was a sexual predator who terrorized its own female employees in its own offices, and despite numerous complaints of workplace sexual misconduct filed against Blanco by female Crowley employees—including at least one credible allegation that Blanco raped a female subordinate on a business trip to Jacksonville, Florida in November 2017—Crowley never took any negative employment actions against Blanco until the company finally and grudgingly terminated his employment on January 24, 2018 for reasons directly related to this complaint.

39. Instead, for years Crowley actively enabled and facilitated Blanco's sexual torment of both male and female employees within its offices and during Crowley-sponsored events and business trips.

IV. November 2016: Blanco Forces Ms. Doe to Watch a Pornographic Video in the Crowley Offices

40. One afternoon, approximately one month after starting her employment with Crowley, Blanco ordered Ms. Doe to meet him at a desk in the Crowley office that

was away from other co-workers and where there was privacy. Blanco also ordered one of Ms. Doe's female coworkers to meet him at the desk.

41. Blanco told Ms. Doe and her coworker that he wanted to show them a "funny video." Ms. Doe found this situation extremely unusual.

42. Blanco proceeded to pull out his phone and force Ms. Doe to watch a pornographic video of transsexual males engaging in sex acts. Mr. Doe was shocked and did not know what to say or how to respond. Blanco then noted that Ms. Doe was blushing and began to ridicule her. Blanco stated that not even Ms. Doe's male coworker "Lucho" was going to be as uncomfortable watching the video as Ms. Doe was. This statement by Blanco indicated to Ms. Doe that Blanco was forcing many, or all, of his subordinates to watch the pornographic video under similar circumstances.

43. After a short time, without saying anything, Ms. Doe simply turned and walked away from Blanco to return to her desk where she sat in stunned silence.

44. Following the incident in which Blanco forced her to watch a pornographic video in the Crowley offices, Ms. Doe no longer felt comfortable or safe working at Crowley, and she began looking for a new job.

V. November 2016: Ms. Doe Wins an Award for Superior Performance

45. Approximately one week after Blanco forced her to watch a pornographic video in the Crowley offices, Ms. Doe was given a "TOPS" award by Crowley for

superior performance. It was her supervisor, Blanco, who nominated Ms. Doe for the TOPS award.

46. Ms. Doe was given the TOPS award based on work she had been performing involving the location and indexing of the U.S. tax identification numbers of Crowley's transportation contractors in the United States. Because of her thorough efforts on the assignment, Ms. Doe was told that she had saved Crowley approximately \$60,000, which was approximately 7.5 times the annual salary Crowley was paying her.

47. After receiving the TOPS award and the significant professional recognition that accompanied the award, Ms. Doe changed her mind about leaving Crowley. Instead of finding work at a new company to escape from Blanco, Ms. Doe formulated a plan to attempt an internal transfer to a different team after a few months. Per Crowley policy, there was a waiting period of several months for internal transfers by new hires.

48. After she received the TOPS award, Blanco's pervasive and persistent sexual harassment of Ms. Doe continued, and he continued to make outrageously inappropriate sexual comments to her and to other team members.

49. It was rare that Ms. Doe had any interaction with Blanco in which he did not say or do something sexually inappropriate. His sexual harassment of his

subordinates was not limited to Ms. Doe or only to women. Ms. Doe frequently heard Blanco make homophobic remarks to male co-workers as well.

50. Ms. Doe also heard Blanco openly and frequently refer to women in a different department with offices adjacent to the Inland Department offices as “whores,” she heard Blanco speculate out loud regarding the types of sex and sexual acts these women preferred, *i.e.*, “rough sex,” “group sex,” “oral sex,” etc.

51. Ms. Doe noticed that some Inland Department team members would laugh at Blanco’s constant sexually explicit and harassing comments. A few men within the Department, who were friends with Blanco, were active participants in his sexual harassment. But Ms. Doe observed that many other team members only occasionally laughed at Blanco’s outrageous comments and behavior as a coping strategy. These employees believed they needed to stay in Blanco’s good graces to avoid being fired by Blanco and felt compelled to laugh at behavior they found extremely offensive and inappropriate.

52. Ms. Doe’s coping strategy was to isolate herself as much as possible from other team members and from Blanco.

VI. Early 2017: Blanco Torments, Sexually Harasses, and then Fires a New Team Member Because She Complained of Sexual Harassment and Rebuffed Blanco's Quid Pro Quo Sexual Advances

53. In early 2017, approximately four or five months after Ms. Doe began working at Crowley, a Crowley employee named "L"¹ attempted an internal transfer into the Inland Department. "L" had been employed by Crowley for approximately 5 years at the time she attempted to transfer to the Inland Department.

54. To become a member of the Inland Department, "L" was required to complete two interviews. The first interview was conducted by Blanco and the second and final interview was conducted by Jose Lopez. Because Lopez generally worked from Crowley's headquarters in Jacksonville, Florida, Lopez typically conducted the interviews by telephone following Blanco's in-person interview in the San Salvador office. When Ms. Doe was hired by Crowley in October of 2016, she was also interviewed by both Blanco in El Salvador and Jose Lopez in the United States prior to being hired.

55. After "L" applied for an internal transfer to Crowley's Inland Department, Blanco scheduled an in-person interview with her. However, before the interview, Blanco somehow obtained a "sex tape" of "L" from "L's" ex-boyfriend without her permission as an act of revenge.

¹ "L" is a pseudonym used to protect the victim's privacy.

56. The day before “L’s” interview, Blanco sent “L’s” sex tape to the entire Inland Department team in El Salvador, as well as Crowley employees who were not in the Inland Department, via messaging apps. Ms. Doe did not watch the video, but almost all the other members of the Department saw some or all of the sex tape prior to “L” joining the team.

57. Following “L’s” interview, Blanco told Ms. Doe and other members of the Inland Department team that he had decided to hire “L,” in part, because he enjoyed her sex tape. After “L” joined the Inland Department team, Blanco and other members of his team taunted and humiliated “L” by frequently repeating phrases she had uttered in the video out loud to her and behind her back.

58. Blanco also frequently and openly propositioned “L” to reenact sexual scenes from the video with him, and he strongly insinuated to “L” that her job security within the Inland Department was dependent on her engaging in sexual acts with him.

59. “L,” who had been employed by Crowley for more than 5 years, had only been a member of Crowley’s Inland Department team for approximately one month when Crowley held a dinner for the entire Inland Department team at a restaurant near the Boqueron Volcano in El Salvador.

60. In attendance at the dinner were Jose Lopez from Crowley headquarters in Jacksonville, Florida as well as Blanco.

61. Before dinner, Ms. Doe and the entire Inland Department team were walking around the grounds of the restaurant admiring the Volcano as well as the impressive landscape. While walking around the grounds, “L” confided in Ms. Doe that Defendant Blanco, and another male co-worker named Mario were sexually harassing her and making her extremely uncomfortable. Ms. Doe advised “L” to report the behavior to Crowley HR the next day.

62. As Mario continued to sexually harass “L” at the restaurant, she decided to openly complain to Blanco about Mario. Blanco then told Jose Lopez about the complaint. Instead of helping “L,” Jose Lopez, Juan Blanco, Mario, and other male team members then began laughing at “L” and taunting her.

63. Ms. Doe specifically recalls Crowley Inland Department Manager Jose Lopez telling “L” *“you should be happy that he’s harassing you, that means he’s interested in you. Look at you, you’re not that young. You’re old!”* On information and belief, “L” was approximately 25 years old at that time.

64. After the dinner, Blanco continued making sexual advances to “L” in the Crowley office. Blanco continued to proposition “L” to reenact sexual scenes from the sex tape with him and to insinuate that her job security was dependent on her engaging in sexual acts with him.

65. Ms. Doe was aware of this behavior because she had been tasked with training “L” for her new position and worked closely with her.

66. As “L” continued to rebuff Blanco’s demands for sex, Blanco became more and more angry with her. Not long after the dinner at the Boqueron Volcano, while in the Crowley office, Ms. Doe overheard a conversation Blanco was having on his private cell phone.

67. Ms. Doe heard Blanco say to the person on the other end of the call, “*I’m just going to have to fire her.*” Ms. Doe could not be sure who Blanco was speaking with, but she suspected Blanco was speaking with Jose Lopez, and she knew that any decision to fire an Inland Department employee in the El Salvador office had to be approved by Jose Lopez in Jacksonville.

68. Only a few minutes after Blanco ended that call, he came to Ms. Doe’s desk. Blanco then ordered Ms. Doe to “*do quality control*” on “L’s” work and told Ms. Doe to “*dig up any mistakes*” that “L” made, no matter how small, and report all mistakes to Blanco.

69. Approximately two weeks later, Blanco fired “L,” citing “performance” issues as the reason. Ms. Doe believed the firing of “L” was a sham and that the performance issues were completely pretextual.

70. Later, when Ms. Doe became a manager for Crowley, she learned much more about Crowley’s official policies regarding employee termination for performance.

71. For example, because “L” was still within her training period, Ms. Doe learned that L’s termination was clearly violative of Crowley’s own policies.

72. After Blanco and Lopez fired “L,” Blanco would frequently boast to the Inland Department about the fact that he had simply snapped his fingers to have “L” fired and that he could do the same to anyone else in the office.

73. Ms. Doe was especially afraid of Jose Lopez, because she knew that Lopez controlled the Inland Department through Blanco and Jacqueline Najera.

74. Najera was the Crowley HR manager in El Salvador who was viewed by Ms. Doe and other female employees as someone who covered-up workplace sexual misconduct within the Crowley offices and enabled Lopez, Blanco, and other predatory male employees of Crowley.

75. In one of Ms. Doe’s only direct interactions with Jose Lopez, she called Lopez in Jacksonville to ask him a complex question about an application Lopez had been responsible for developing and that Ms. Doe was required to use for her job. Ms. Doe was able to get Lopez on the phone, but before she could finish asking her question, Lopez told her to “*eat shit*” and then hung up the phone on her. Ms. Doe believed Lopez viewed the women in Crowley’s El Salvador office as less than human. Jose Lopez’s management of the El Salvador office and his treatment of female employees would eventually be investigated by Crowley, and

would result in a formal investigation report, dated May 1, 2018, that is attached hereto as “**Exhibit 2.**”

VII. November 2016: Crowley Announces Award of the Defense Freight Transportation Services (DFTS) Contract by the U.S. Government

76. On November 28, 2016, less than 2 months after Ms. Doe began working for Crowley, the company publicly announced that Crowley had been awarded a “large, multi-year U.S. Department of Defense freight services contract” known as the “Defense Freight Transportation Services (‘DFTS’)” contract.²

77. In its November 28, 2016 press release announcing that Crowley had been awarded the DFTS contract, CEO Tom Crowley said, “We are very proud and appreciative of the opportunity to support our country and the Defense Department with transportation and logistics services through this new TRANSCOM contract...We will reward TRANSCOM’s confidence in us by providing the highest quality service with safety, integrity and high performance.”³

78. According to Crowley’s press release, the DFTS contract had a value of \$2.3 billion and was a “freight-all-kinds (FAK) contract” that encompassed “all forms of surface transportation throughout the United States and Canada,” including

² <https://www.crowley.com/news-and-media/press-releases/crowley-awarded-large-multi-year-u-s-department-of-defense-freight-services-contract/>

³ *Id.*

“less-than-truckload (LTL) and full truckload (FTL) services” as well as “expedited, time-definite, and rail services.”

79. As Crowley began preparing to implement an enormous new logistics contract for the U.S. Department of Defense, the company began bolstering its Inland Department with both internal and external hires, and the Inland Department team grew in both the United States and El Salvador.

VIII. June 2017: Vanessa Treminio Joins Ms. Doe as part of the Inland Department Team.

80. On June 1, 2017, Crowley employee Vanessa Treminio joined Ms. Doe as a member of the Inland Department team in Crowley’s San Salvador office.

81. Mrs. Treminio joined the team as an internal transfer within Crowley. When Treminio became a member of the Inland Department, she had already been employed by Crowley for over 5 years.

82. It was Mrs. Treminio who would eventually file suit against both Juan Emilio Blanco and Crowley Maritime Corporation in federal court in the United States in 2022 alleging sex trafficking, forced labor, as well as other causes of action against both Blanco and Crowley.

83. Ms. Doe and Mrs. Treminio worked together at Crowley in the Inland Department in 2017 and 2018.

IX. July 2017: Juan Blanco Makes Crude Sexual Remarks to Ms. Doe in the Cafeteria Inside the Crowley Offices in Front of Co-workers

84. One day during July of 2017, the Inland Department team gathered in the cafeteria inside the Crowley offices to celebrate the birthdays of Ms. Doe and one other team member.

85. Blanco was present, as was Blanco's wife, Caro. Ms. Doe's boyfriend at the time drove a pickup truck, and when casting sexually inappropriate remarks at Ms. Doe in the Crowley offices, Blanco would refer to her boyfriend as "the guy in the pickup truck."

86. While the team was eating birthday cake—apropos of nothing—Blanco looked directly into Ms. Doe's eyes and told her he could picture the way her boyfriend "f__ked" her inside the truck. Blanco then began gyrating his hips and moving his body to imitate a sex act.

87. Ms. Doe was shocked. Blanco's wife Caro gently hit Blanco on the shoulder, telling him to stop. A few male teammates who were friends with Blanco were laughing, while other male and female team members rolled their eyes, shook their heads, or looked away in disgust.

88. Ms. Doe had created defenses to Blanco's sexual harassment in one-on-one situations, such as avoiding in-person interactions with him, removing herself from team group chats, isolating herself from others on the team, never smiling or acting friendly toward Blanco, and strictly limiting their discussions to work-related

topics. Blanco thus took advantage of group settings as opportunities to make outrageous and humiliating sexual comments toward Ms. Doe.

X. Summer of 2017: Blanco Becomes Intoxicated and Makes a Threatening Sexual Statement to Ms. Doe at a Seafood Restaurant in San Salvador During a Team Dinner

89. In the summer of 2017, Crowley hosted a dinner for the Inland Department team at a seafood restaurant in San Salvador, El Salvador. Ms. Doe, Mrs. Treminio, and most Inland Department team members were present.

90. Several team members brought a bottle of liquor to the dinner and gave it to Blanco as a gift. Blanco drank from the bottle as well as from other alcoholic drinks served by the restaurant and became visibly intoxicated.

91. During the dinner, while intrusively staring at Ms. Doe, Blanco said “*one day I’m going to get you drunk,*” insinuating his intent to get her intoxicated so he could force sex on her.

92. Ms. Doe was intimidated and frightened by Blanco’s statement and the danger of future harassment and sexual assault it signified. One of her fellow team members told Blanco to “shut up,” and told Blanco that what he said was inappropriate. Blanco simply laughed off this admonishment and continued to leer intrusively and sexually at Ms. Doe, reinforcing that his sexual threat to her was not an empty one.

93. After this team dinner at a seafood restaurant in San Salvador, and after receiving what Ms. Doe interpreted as a sexual threat from Blanco, she was so terrified that she again decided to leave Crowley and subsequently began looking for new jobs. Although her plan had been to transfer to a new department within Crowley, she did not feel comfortable continuing to work for Blanco while attempting an internal transfer.

XI. July 26, 2017: Crowley Definitively Awarded the Defense Freight Transportation Services (DFTS) Contract by the U.S. Government

94. On July 26, 2017, after a contested legal battle over the initial award of the DFTS contract to Crowley by competing defense contractors, Crowley announced the U.S. Department of Defense had definitively awarded Crowley the DFTS contract.

95. In August of 2017, Blanco announced to Ms. Doe and the entire Inland Department team that Crowley intended for much of its work on the DFTS contract to be conducted from Crowley's offices in San Salvador, El Salvador.

96. Blanco announced the Inland Department team would be helping to provide logistics services to the U.S. Department of Defense and facilitating large volumes of interstate commerce throughout the United States as well as international commerce between the United States and Canada on behalf of the U.S. military.

97. Blanco further announced that he would personally be choosing a few select team members to travel to Crowley headquarters in the United States with him for training on the implementation of the DFTS contract.

98. To Ms. Doe and to all the other team members, these trips to the United States represented huge professional opportunities, and everyone on the Inland Department team wanted to be chosen.

99. Ms. Doe was told that the employees selected by Blanco for travel to the United States had to be approved by Jose Lopez and possibly even more senior Crowley executives in the United States, but she also believed that Lopez and more senior Crowley executives would merely ratify Blanco's decisions regarding who would travel to the United States for DFTS training.

100. Blanco subsequently created a kind of open competition for the international training opportunities, pitting team members against each other, to be selected to go on a trip to the United States.

101. With a once-in-a-lifetime opportunity to travel to the United States now a possibility for Ms. Doe, she again changed her mind about leaving Crowley and decided to stay at the company and vie for this valuable opportunity.

XII. October 2017: Ms. Doe's Co-Worker Vanessa Treminio is Selected by Blanco and Crowley to Travel to Jacksonville, Florida for DFTS Training.

102. To Ms. Doe's knowledge, an experienced male Inland Department team member named Emilio had originally been selected to go on the first DFTS training trip to Jacksonville with Blanco.

103. At the last minute, Blanco removed Emilio from the trip and selected Mrs. Treminio to travel with him to Jacksonville instead. Ms. Doe and other Inland Department team members were surprised by Blanco's decision and did not feel that Mrs. Treminio deserved to go on the trip, because she had only been a member of the Inland Department for less than 6 months, while Emilio, Ms. Doe, and others had more experience.

104. Ms. Doe understood that to remove Emilio from the trip to Jacksonville so that he could replace him with Mrs. Treminio, Blanco may have placed Emilio into a contrived "action plan" or "Performance Improvement Plan (PIP)" under the pretext of poor work performance that was not actually deserved.

105. Being removed from the business trip to Jacksonville and being placed into an "action plan" or PIP greatly angered Emilio, and on information and belief, Emilio, another Inland Department team member named Blanca, and at least one additional team member subsequently filed formal complaints against Blanco through Crowley's "Ethics" complaint process.

XIII. October 2017: Ms. Doe Sees Bruises on Mrs. Treminio's Arms.

106. In October of 2017, in the office, Mrs. Treminio raised her arms, causing her sleeves to slide toward her shoulders, revealing deep bruising which appeared to be the result of someone forcefully grabbing Treminio's arm.

107. Ms. Doe asked Mrs. Treminio about the bruises and asked, "What happened, . . . are you ok?" Mrs. Treminio became flushed and flustered, and she blurted out something about how the bruises were related to her "blood sugar" levels even though Mrs. Treminio does not have diabetes or blood sugar issues.

108. However, because of Mrs. Treminio's fright and demeanor, Ms. Doe had a feeling Mrs. Treminio was hiding the real reason for the bruises on her arms.

109. More than four years later, after Mrs. Treminio's lawsuit against Crowley and Blanco became public, Ms. Doe connected the dots and wondered if the bruises on Mrs. Treminio's arms that she had seen in October of 2017 were related to an incident, described in Treminio's amended complaint, in which Blanco sexually assaulted and attacked Mrs. Treminio inside an elevator at the Crowley offices. **Exhibit 1 ¶¶ 20, 21, 22, 23.**

110. After Treminio's lawsuit became public, Ms. Doe spoke with Mrs. Treminio, who confirmed that the bruises she had seen on her arms were from an assault by Blanco. However, Treminio explained that the bruises were not from the sexual assault in the elevator, but rather, from another incident with Blanco shortly

after she reported Blanco's sexual attack in the elevator to Crowley HR Manager, Jacqueline Najera. **Exhibit 1 ¶¶ 24-31.**

111. Following her meeting with Najera in which Treminio reported being sexually assaulted in the Crowley elevator, Treminio returned to her desk to find Blanco waiting for her, apparently tipped off by Najera to the fact Treminio had reported the assault to HR. **Exhibit 1 ¶¶ 32-36.**

112. Blanco then forcefully grabbed Treminio's arm while making angry threats to Treminio for reporting him to HR. Blanco grabbed Treminio with such force that he left significant bruising on the upper part of her arm. During their 2023 conversation, Treminio confessed to Ms. Doe that she had been afraid to tell her what Blanco had done or how she had sustained the bruising on her arms when Ms. Doe her asked in October of 2017.

XIV. November 5, 2017: Mrs. Treminio Flies to Jacksonville, Florida for DFTS Training. Blanco Allegedly Rapes Mrs. Treminio in Jacksonville During the Trip.

113. According to the lawsuit she filed against Crowley and Blanco in 2022, Inland Department team member Vanessa Treminio flew to the United States on November 5, 2017 for training on the Defense Freight Transportation Services (DFTS) contract. **Exhibit 1 ¶ 40.** Ms. Doe remained behind at the Crowley offices in San Salvador.

114. According to Mrs. Treminio's amended complaint, on the final night of the business trip in Jacksonville, Florida, Blanco fraudulently obtained access to Mrs. Treminio's hotel room, entered her room while Mrs. Treminio was asleep, and then forcibly raped her. **Exhibit 1 ¶¶** 41, 42, 43, 44, 45.

115. According to Treminio's amended complaint, the next morning, she reported the rape to Jose Lopez and another Crowley employee at Crowley headquarters in Jacksonville, and was subsequently ridiculed and demeaned by Lopez, who told Treminio, among other offensive things, that being raped wasn't really a big deal because she was not a virgin when it happened. **Exhibit 1 ¶¶** 47, 48, 49, 50.

116. According to Treminio's amended complaint, during a meeting inside a conference room at Crowley's headquarters in Jacksonville, Jose Lopez told Mrs. Treminio that no one was ever going to believe her story about being raped by Blanco, and Lopez threatened Mrs. Treminio that she should "*shut up*" about being raped if she wanted to keep her job. **Exhibit 1 ¶** 50.

117. According to Treminio's amended complaint, on the afternoon of November 10, 2017, Mrs. Treminio flew back to El Salvador. According to her amended complaint, Blanco also flew back to El Salvador on November 10, 2017 and was aided in fleeing the United States by Crowley.

118. According to her amended complaint, and according to Crowley's own sworn statements made under oath in Treminio's lawsuit, despite being aware of

Treminio's rape allegation, Crowley never reported Treminio's rape allegation to law enforcement officials in Jacksonville, Florida, never attempted to assist Mrs. Treminio in reporting the rape to law enforcement, and never investigated Treminio's reports of rape committed by Blanco. **Exhibit 1 ¶¶ 51, 52, 53, and Exhibit X.**

XV. November 13, 2017: Blanco Returns to Work at the Crowley Offices in San Salvador. Crowley Flies Mrs. Treminio to Puerto Rico to Work on a Disaster Relief Contract for the U.S. Government

119. On November 13, 2017, only days after allegedly raping his Inland Department subordinate Vanessa Treminio in a hotel room in Jacksonville, Florida, Blanco was back at work in Crowley's office in San Salvador. Ms. Doe was also in the office, completely unaware of what had allegedly transpired in Jacksonville between Blanco and Treminio or between Lopez and Treminio.

120. Mrs. Treminio was not in Crowley's San Salvador office on Monday November 13, 2017. According to her amended complaint, immediately after reporting to Crowley that she had been raped by Blanco in Jacksonville, Crowley ordered Treminio to fly to Puerto Rico to work on a FEMA disaster relief project. **Exhibit 1 ¶ 54.**

121. Ms. Doe eventually learned that Crowley had sent Vanessa Treminio to Puerto Rico, and she learned that a fellow Inland Department team member named "Lucho" had also been sent to Puerto Rico.

122. Ms. Doe was not aware of the reason Crowley decided to send Mrs. Treminio to Puerto Rico immediately following her trip to Jacksonville, or why Crowley did not want Mrs. Treminio in the San Salvador office following her trip to Jacksonville.

XVI. Week of November 13-17, 2017: Crowley Allows Blanco to Select His Next Victim. Blanco Tells Ms. Doe She Will Accompany Blanco on the Next DFTS Training Trip to Jacksonville, Florida.

123. During the week of November 13-17, only days after allegedly raping Inland Department team member Vanessa Treminio in Jacksonville, Florida on a DFTS training trip, Blanco ordered Ms. Doe to join him for a one-on-one meeting in a conference room in the Crowley offices in San Salvador.

124. During that meeting, Blanco selected Ms. Doe to travel with him to Jacksonville, Florida for DFTS training in January. Blanco told her that she would be required to obtain a travel visa—a process that Crowley would facilitate.

125. For Ms. Doe, the news was both exciting and terrifying. She had never traveled internationally, did not possess a visa that would allow her to travel to the United States, and could never in her entire life have been able to afford to travel to the United States based on the salary of approximately \$8,000 per year that she was earning at Crowley.

126. For Ms. Doe, the opportunity to work on a high-profile contract for the U.S. Department of Defense, to obtain a travel visa that would allow her to travel back

and forth to the United States on business trips, and to actually visit the United States for training were all enormously valuable career opportunities. The DFTS training trip was the most significant professional opportunity of her life.

127. On the other hand, the prospect of going on an international business trip with a man she considered a sexual predator—a man who had subjected her to humiliating and pervasive sexual harassment, forced her to watch nonconsensual porn, and sexually threatened her—was utterly frightening. Ms. Doe was painfully conflicted about the situation.

XVII. November 7, 2017: Crowley Vice President of Ethics and Compliance Arthur LaMoureaux Becomes Aware of Sexual Misconduct Allegations Against Juan Emilio Blanco and the Initiation of a Formal Investigation Into Blanco via EthicsPoint® Case #280

128. On the same day that Crowley allowed Blanco to select Ms. Doe as his next victim who would travel with him to the United States where he would attempt to rape her, Crowley was actively conducting a sexual misconduct investigation into Blanco based on formal ethics complaints filed against Blanco by some of his subordinates in the Inland Department via Crowley's EthicsPoint® incident management portal.

129. Crowley allowed Blanco to select Ms. Doe for the DFTS training trip during the week of November 13-17, but the first *yet* known formal ethics complaint filed against Blanco for sexual misconduct by Inland Department subordinates was submitted to Crowley via EthicsPoint® on November 7, 2017. This EthicsPoint®

complaint against Blanco was assigned EthicsPoint® Case #280. The November 7, 2017 EthicsPoint® Case #280 is attached hereto as “**Exhibit 3.**”

130. In her amended complaint filed in 2022, Vanessa Treminio alleges that she was raped by Blanco on the evening of November 9, 2017, or possibly the early morning of November 10, 2017, in her hotel room in Jacksonville, Florida. **Exhibit 1 ¶ 44.** Treminio alleges in her amended complaint that, before she was forced to go on the business trip, she begged Crowley Human Resources Manager Jaqueline Najera not to send her on the DFTS business trip with Blanco, because Blanco had already sexually assaulted Treminio and she was afraid that he would do it again in Jacksonville. **Exhibit 1 ¶¶ 24-39.**

131. The existence of EthicsPoint® Case #280 proves that *prior to* Vanessa Treminio’s alleged rape by Blanco in Jacksonville on November 9 or 10th, 2017, Crowley Vice President of Ethics and Compliance Arthur LaMoureaux was aware that extremely serious allegations of ongoing workplace sexual misconduct had been lodged against Blanco by a Crowley employee. **Exhibit 3.**

132. The existence of EthicsPoint® Case #280 also proves that 2 months *prior to* Crowley allowing Blanco to procure and then transport Ms. Doe from El Salvador to the United States for the purposes of sexually attacking her on a DFTS training trip, Crowley Vice President of Ethics and Compliance Arthur LaMoureaux was aware that a Crowley employee in El Salvador had formally reported extremely

serious allegations via Crowley's EthicsPoint® platform that Blanco was engaging in a highly disturbing, dangerous, and longstanding pattern of workplace sexual misconduct. **Exhibit 3.**

133. Arthur LaMoureaux is listed on EthicsPoint® Case #280 as one of the “*case assignees,*” along with Crowley's Global Director of Human Resources and Equal Employment Opportunity (EEO) coordinator Tiffany King, Melvin Dodson, Zoraida Jirau, Crowley's Director of Ethics and Compliance Greg Kencitzski, Senobia Matute, Susan Michel, and Heitzel Monroy. **Exhibit 3.**

134. On November 7, 2017, the “reporter” who submitted the complaint that became EthicsPoint® Case #280 wrote of Juan Emilio Blanco: “*He is constantly yelling at personnel in general [cursing] at some of them and [threatening] us with contract termination. He constantly (everyday) makes sexual comments about people from the team and from different teams. He conceals, promotes and approves this kind of behavior among the team in different practices such as Whatsapp group conversation sending sexual comments about people from the team and outside the team... This is an ongoing behavior, it happens everyday, some days it's [worse] than others and some good resources have already quit working here because of his behavior... Juan makes really offensive sexual comments at all time of the day about people in the team and people from other teams. He encourages this kind of behavior among the team and has made some*

instant messaging groups in which he gives nicknames to men and women in the company, which goes from “fuck face” to making really bad comments such as ‘I would love to f... that girl, I bet she is really good at.....’ he even makes obscene signs at us with his middle finger...” Exhibit 3.

135. On November 7, 2017, the reporter of what became EthicsPoint® Case #280 also wrote that he or she had “*witnessed and suffered this behavior since I started working in this company,*” that Blanco’s sexually abusive behavior had been ongoing for at least “*3 months to a year,*” that he or she had been personally affected by Blanco’s sexual misconduct, and that employees were “*afraid that he will do something to them if he finds out that they have presented a report in HHRR [Crowley Human Resources].*” **Exhibit 3.**

XVIII. November 9, 2017: Two Additional Crowley Employees File EthicsPoint® Complaints Alleging Hostile Work Environment and Workplace Sexual Misconduct Against Juan Emilio Blanco. Complaints are Received by Senior Crowley Leaders, Including Crowley Vice President of Ethics Arthur LaMoureaux.

136. Two days after the first *yet* known Crowley employee submitted the workplace sexual misconduct complaint against Juan Blanco that became EthicsPoint® Case #280, two additional Crowley employees filed EthicsPoint® complaints alleging “*hostile [work] environment*” and workplace sexual misconduct against Blanco.

137. The November 9, 2017 EthicsPoint® complaint against Blanco that became EthicsPoint® Case #282 is attached hereto as “**Exhibit 4.**”

138. The November 9, 2017 EthicsPoint® complaint against Blanco that became EthicsPoint® Case #283 is attached hereto as “**Exhibit 5.**”

139. EthicsPoint® Cases #282 and #283 were sent to Crowley VP of Ethics Arthur La Moureaux, Crowley’s Global Director of Human Resources and Equal Employment Opportunity (EEO) coordinator Tiffany King, Melvin Dodson, Zoraida Jirau, Greg Kencitzski, Senobia Matute, Susan Michel, and Heitzel Monroy.

140. In her amended complaint, Vanessa Treminio alleges that she was raped by Juan Blanco in Jacksonville late in the evening November 9 or the early morning of November 10, 2017. **Exhibit 1 ¶¶ 41, 42, 43, 44, 45.** *Before* Treminio was allegedly raped by Blanco in Jacksonville, senior Crowley leaders, including Crowley’s VP of Ethics Arthur La Moureaux, were in possession of *at least* 3 formal EthicsPoint® complaints made by Crowley employees alleging hostile work environment and extreme workplace sexual misconduct against Blanco.

141. During the workday on November 9, 2017, while in possession of substantial evidence that Blanco was a sexual predator, the numerous senior Crowley leaders in possession of the 3 EthicsPoint® complaints that had already been made against Blanco also knew that Blanco was on that same day in

Jacksonville for DFTS training, and staying at a hotel with two young, vulnerable, isolated, and nearly powerless female subordinates from El Salvador. Had Crowley taken immediate action against Blanco on November 7, 2017 in response to EthicsPoint® Case #280, or if Crowley had taken immediate action on November 9, 2017 after having received *at least* 3 EthicsPoint® complaints against Blanco, Vanessa Treminio’s alleged rape by Blanco could easily have been prevented.

142. EthicsPoint® Case #282, submitted on November 9, 2017—apparently by a male subordinate of Blanco—alleged that Blanco created a “*hostile [work] environment,*” that Blanco created “*tension*” in the Inland Department that felt “*like a witch hunt,*” that Blanco was “*very arrogant and egocentric,*” and that Blanco engaged in workplace “*harassment.*” **Exhibit 4.**

143. On December 6, 2017, Crowley’s Human Resources Director for Central America Senobia Matute wrote in response to EthicsPoint® Case #282, “*Dear reporter [complainant], Next week I will be in El Salvador, Tuesday [December] 12 and Wednesday 13 [2017] in the morning. I hope we can have the opportunity to talk about your report and the observations you have made in the same way.*”

Exhibit 4.

144. EthicsPoint® Case #283, submitted on November 9, 2017—apparently by a female subordinate of Blanco—made extraordinarily serious allegations of extreme workplace sexual harassment against Blanco, and included an allegation that

Blanco had retaliated against a female Crowley employee who reported being sexually harassed by one of Blanco's male friends in the Inland Department by firing the victim and protecting the man who had sexually harassed her. **Exhibit 5.**

145. In EthicsPoint® Case #283 the employee complainant wrote, *"I'm reporting Juan Emilio Blanco, Inland operations supervisor...a few months ago there was an incident of sexual harassment inside the team. She [the victim] reported that [sexual harassment] to Juan Emilio Blanco and instead of starting a process against the man who harassed her, he [Blanco] started a process against her [the victim]...and at the end she got fired, because the one who committed the [sexual harassment] is one of his [Blanco's] favorites...Also he [Blanco] refers to women (not from the team) in a disrespectful way, calling them names (offensives or sexist even misogynists)...Most of these events have not been reported because of fear of losing the job. But the situation has become unbearable."* **Exhibit 5.**

146. On November 15, 2017 at 5:09 PM, Senobia Matute updated EthicsPoint® Case #283 to reflect that she had been able to identify and speak with the woman who filed the ethics complaint against Blanco. Matute wrote, *"Today I reached the person that reported the incident. Further information was given. A formal report will be prepared on the case."* **Exhibit 5.**

147. On November 20, 2017 at 3:11PM, five days after Senobia Matute updated EthicsPoint® Case #283, Heitzel Monroy, Crowley's Regional Director, Audit,

Compliance & Ethics for Central America & Puerto Rico, sent an electronic message to Crowley’s VP of Ethics Arthur LaMoureaux. The electronic message from Monroy to LaMoureaux is attached hereto as “**Exhibit 6.**”

148. The subject line of Monroy’s electronic message to LaMoureaux was “*Casos SAL,*” which could be translated as “Cases El Salvador.” Attached to the message to LaMoureaux were three documents, which were titled 280.docx, 282.docx, and 283.docx. It is not clear why these documents had taken out of EthicsPoint® and subsequently converted into editable Microsoft Word files. But what does seem clear is that the three attachments corresponded to EthicsPoint® Cases #280, 282, and 283, and that on November 20, 2017—ten days *after* Blanco allegedly raped Vanessa Treminio, but nearly two months *before* Blanco sexually attacked, assaulted, and terrorized Ms. Doe on a subsequent DFTS training trip to Jacksonville—Arthur LaMoureaux and Crowley leadership at the highest levels of the company were well aware that Juan Blanco was a sexual predator. **Exhibit 5.**

149. Despite this knowledge, Crowley never took any negative employment action against Blanco on the basis of at least 3 EthicsPoint® Case reports, and an unknown number of other reports and complaints about Blanco, that Crowley received prior to Ms. Doe’s trip to Jacksonville in January of 2018.

XIX. Late November or Early December, 2017: Vanessa Treminio Calls Crowley’s Vice President of Ethics and Compliance Arthur LaMoureaux to Make a Formal Ethics Complaint Against Juan

Emilio Blanco Alleging that Blanco Raped Her in Jacksonville During a DFTS Training Trip Less Than One Month Earlier.

150. According to her amended complaint, Vanessa Treminio was raped by Blanco late on November 9, 2017 or early in the morning of November 10, 2017 during a DFTS training trip in Jacksonville. According to her amended complaint, on the morning of Friday November 10, 2017 she went to Crowley’s headquarters and immediately reported the rape to Crowley Inland Department Manager Jose Lopez, who, according to Treminio’s amended complaint, threatened her to stay silent about the rape, and made many other disgusting, dehumanizing, and potentially criminal responses to the rape allegation. **Exhibit 1 ¶¶ 47, 48, 49, 50.**

151. According to her amended complaint, instead of sending Treminio back to work in her El Salvador office following the trip to Jacksonville during which she was allegedly raped by Blanco, Crowley quickly shipped Treminio off on a sudden, extended work trip to Puerto Rico. Treminio arrived in Puerto Rico on Monday November 13, 2017—only days after her alleged rape. **Exhibit 1 ¶¶ 54-57.**

152. According to her amended complaint, at the urging of Crowley employee Ayesha Diaz, who was Mrs. Treminio’s supervisor in Puerto Rico, Treminio called LaMoureaux and reported the rape. According to the amended complaint, “*On the call, Mr. LaMoureaux asked Mrs. Treminio for her permission to conduct an investigation. Mr. LaMoureaux specifically asked Mrs. Treminio if she would give*

him permission to go to the hotel in Jacksonville where she was raped to check the hotel's files, to interview employees, check the hotel's security cameras, and complete other necessary investigatory steps. Mrs. Treminio gave LaMoureaux her permission..." **Exhibit 1 ¶ 65.**

153. According to Treminio's amended complaint, "*About two weeks after she reported her rape and the aftermath to Arthur LaMoureaux, Mrs. Treminio was still in Puerto Rico when she received a call from LaMoureaux. First, LaMoureaux apologized for what had happened to her in Jacksonville. Then LaMoureaux told Mrs. Treminio that Crowley's investigation was able to prove that Mrs. Treminio was telling the truth about being raped by Juan Emilio Blanco. Accordingly, Crowley had decided to terminate the employment of Juan Emilio Blanco and two additional employees. According to LaMoureaux, as a result of Crowley's ethics investigation, Crowley also fired Jose Lopez, who had intimidated Vanessa into silence inside the Crowley headquarters, compared Mrs. Treminio to a used car, told Mrs. Treminio that she should be grateful Juan Emilio Blanco had raped her, and then helped Mr. Blanco flee the United States in an effort to escape justice.*" **Exhibit 1 ¶¶ 66-67.**

154. Mrs. Treminio returned to El Salvador from Puerto Rico on December 30, 2017. In the early days of January 2018, Mrs. Treminio returned to the Crowley

office in San Salvador expecting—based on what Arthur LaMoureaux had assured her—that Juan Emilio Blanco would no longer be working for Crowley.

155. Mrs. Treminio was therefore shocked, confused, and completely terrified to see Blanco walking around the Crowley offices in San Salvador in early January 2018 as if nothing had happened and without a care in the world. Mrs. Treminio has testified under oath in a deposition related to her ongoing sex trafficking and forced labor lawsuit against Crowley that seeing Blanco in the office that day “*felt like getting raped all over again.*”

XX. Crowley Admits Under Oath in a Sworn Legal Document that LaMoureaux Received a Report from Vanessa Treminio Alleging Blanco Raped Her in Jacksonville, Yet Crowley Also Admits Under Oath in the Same Sworn Legal Document that Crowley’s Vice President of Ethics & Compliance Never Told ANYONE Else at Crowley About the Rape Allegation.

156. In Crowley Maritime Corporation’s Response to Interrogatories, submitted on March 15, 2023 in Treminio’s related sex trafficking and forced labor litigation against Crowley, the company wrote, in response to Interrogatory #11 (attached hereto as “**Exhibit 7**”): “*Therefore, from the time of...[Vanessa Treminio’s] alleged sexual assault [on November 9, 2017] until the time Defendant Blanco was terminated [on January 24, 2018], there is one individual, Arthur LaMoureaux, c/o Alexander DeGance Barnett L.A., who became aware of Plaintiff’s allegation that she was sexually assaulted by Defendant Blanco while on a trip to Jacksonville. Plaintiff disclosed this information to Mr. LaMoureaux in or around December or*

January 2018 and asked him to keep it confidential and not to disclose it to Human Resources. Mr. LaMoureaux also informed Plaintiff of an investigation Crowley's Human Resources Department was conducting regarding Defendant Blanco.”

Exhibit 7.

157. According to her amended complaint, and to Treminio's testimony under oath in her related sex trafficking and forced labor litigation against Crowley, Vanessa Treminio's first call with Arthur LaMoureaux occurred while she was in Puerto Rico working on a FEMA disaster relief contract for Crowley, and on the same day she received a call from Crowley HR Director Senobia Matutue, who was conducting a sexual misconduct investigation into Blanco based on the receipt of EthicsPoint® Cases #280, 282, and 283. **Exhibit A ¶¶ 64, 65.**

158. Treminio departed Puerto Rico and returned to El Salvador on December 30, 2017; thus Crowley's Vice President of Ethics & Compliance Arthur LaMoureaux was aware of criminal rape allegations made against Blanco by at least December 30, 2017, and likely weeks earlier. However, Crowley has admitted under oath that in response to the reported rape, LaMoureaux never notified law enforcement in Jacksonville, never conducted an investigation, never notified anyone else at Crowley, and took no action against Juan Blanco, but instead kept the reported sex crime “*confidential.*” **Exhibit 7.**

159. When Vanessa Treminio returned to El Salvador on December 30, 2017, she had reported her rape to LaMoureaux, and there was still more than a week remaining until Crowley and Blanco would traffic Ms. Doe from El Salvador to Jacksonville, Florida, and two weeks until Ms. Doe would also be sexually abused by Blanco. Tragically, Crowley's Vice President of Ethics & Compliance could have prevented this sexual abuse by taking appropriate action in response to an incredibly serious allegation of rape that Crowley admits under oath was reported to him by Treminio.

160. Ms. Doe could have easily been spared the horror of being trafficked to the United States where she was sexually attacked by a man Crowley had been repeatedly warned was a sexual predator. Instead, Crowley has admitted that LaMoureaux did nothing to prevent the sexual abuse Ms. Doe endured.

XXI. December, 2017: Crowley Assists Ms. Doe in Obtaining a Non-Immigrant Travel Visa to the United States.

161. A few weeks after Ms. Doe's mid-November 2017 one-on-one meeting with Blanco, during which Blanco told Ms. Doe he had selected her to travel with him on the next DFTS training trip to Jacksonville in January of 2018, Crowley sent Ms. Doe to the U.S. embassy in San Salvador with a letter, printed on Crowley letterhead, in support of her application for a non-immigrant visa to the United States. When Crowley sent Ms. Doe to the embassy in San Salvador, Mrs. Treminio was still in Puerto Rico.

162. At that time, Crowley's VP of Ethics and Compliance Arthur LaMoureaux was actively participating in an investigation into allegations of extreme workplace sexual misconduct committed by Blanco (**Exhibit 6**), while simultaneously keeping "*confidential*" an allegation that Blanco had recently committed a felony sex crime in the United States against one of his subordinates while on a DFTS training trip. **Exhibit 7**.

163. The letter Crowley gave to Ms. Doe was written on Crowley letterhead and addressed to the Honorable Consul General, Consulate of the United States of America, San Salvador, El Salvador. The letter stated that Crowley Maritime Corporation was a U.S.-based corporation headquartered in Jacksonville, Florida, and that Ms. Doe was an employee of Crowley Maritime Corporation.

164. Crowley's letter to the Honorable Consul General stated that there were trainings and meetings in the United States that required the participation of Ms. Doe, and that all travel expenses, including airfare, transportation, meals, lodging, and training would be paid for by Crowley Maritime Corporation.

165. Crowley's letter requested the assistance of the Consul General in granting a non-immigrant visa to Ms. Doe to attend the DFTS training in Jacksonville, Florida. Because of Crowley's letter and influence, and because of the importance of the DFTS contract to the United States Department of Defense, by mid-December of 2017, only a few weeks after her visit to the U.S. embassy, Ms. Doe

was granted a temporary non-immigrant visa to attend the DFTS training in January.

166. Crowley would eventually assist Ms. Doe in obtaining a 10-year work and travel visa to the United States, which was a document that would have been impossible for Ms. Doe to obtain without Crowley's facilitation and financing of the visa application process.

167. Not long after her visa application was approved, and as the date of the DFTS trip to Jacksonville approached, Blanco approached Ms. Doe in the office and told her he was actively searching hotels in Jacksonville, and that he was "*going to get a real nice hotel for you.*" This comment frightened Ms. Doe. Blanco's tone and demeanor were threatening and made Ms. Doe feel that Blanco was communicating that he would be physically in control of her life, and even where she slept, while in Jacksonville.

XXII. Mid to Late December, 2017: Ms. Doe Requests a Private Meeting With Crowley HR Manager Jaqueline Najera and Tells Najera She Does Not Feel Safe Traveling to the U.S. with Blanco. Najera Ignores Ms. Doe's Safety Concerns and Threatens to Fire Her in Response.

168. After Ms. Doe obtained her travel visa, and after Blanco told Ms. Doe he was choosing "*a real nice hotel*" for her, Ms. Doe requested a private meeting with Crowley Human Resources Manager Jaqueline Najera because she did not feel safe traveling to the United States with Blanco.

169. Ms. Doe did not want anyone to see her speaking with Najera, especially Blanco, because she feared retaliation, particularly after the abuses of power she had witnessed with regard to “L” and other women at Crowley.

170. Ms. Doe’s meeting with Crowley HR Manager Jaqueline Najera occurred in mid to late December of 2017, not long before Ms. Doe’s trip to the United States for the DFTS contract implementation training.

171. Ms. Doe was very nervous because it was the first time she had ever gone to HR at Crowley to make a complaint or to report misconduct. Asking for the meeting was a great professional risk, because she knew that Blanco and Najera had a close relationship, and because she knew that Jose Lopez controlled the Inland Department team in El Salvador through his control of Najera and Blanco.

172. In the meeting, Ms. Doe told Najera that she did not feel safe traveling to Jacksonville, Florida with Blanco in January of 2018. Ms. Doe then told Najera, “*I am afraid to travel with Juan to Jacksonville, because he has always been highly inappropriate with me and with the team in general, and I am scared that he will try to do something to me in Jacksonville when I’m alone with him.*”

173. In response, Ms. Najera was completely dismissive and told Ms. Doe that she did not have to spend the entire two weeks in Jacksonville with Blanco, because she could simply use taxis or ride-hailing apps such as Uber to move

around the city without relying on Blanco for transportation away from the hotel he had chosen for her.

174. Ms. Doe thought Najera's comment was ridiculous and intentionally oblivious to the real sense of fear and danger she was expressing. Ms. Doe also knew that from the small salary Crowley was paying her, taxi fares in the United States would be exorbitantly and prohibitively expensive, and that Blanco would likely attempt to control all of her movements while in the United States.

175. Ms. Doe then explicitly told Najera that her concerns about Blanco went beyond her fear that he might sexually attack her in Jacksonville. Ms. Doe told Najera that she did not ever feel safe around him, in any place, including in the Crowley office.

176. Najera abruptly cut her off and told Ms. Doe that if she did not feel safe traveling with Blanco on the business trip, or feel safe being around Blanco in the office, she could find a new job. Ms. Doe was speechless. Najera then stared at Ms. Doe for a few moments before saying, "*Can I help you with anything else?*"

177. After leaving the conference room, Ms. Doe stood alone in the hallway for a few minutes, feeling distraught and dumbfounded. Requesting the meeting with Najera and voicing her dire concerns for her safety around Blanco had required a great deal of courage. But she had not been taken seriously, and Najera threatened

to terminate her employment with Crowley if she continued to speak up about Blanco.

178. From the manner in which Najera trivialized Ms. Doe's fears about Juan Blanco and delivered the ultimatum about finding another job, it was clear to Ms. Doe that she did not have any choice other than to go on the business trip if she wanted to keep her job.

179. Ms. Doe had already seen Blanco, Lopez, and Najera fire "L," and she knew they had the power to do the same to her for any reason.

180. Ms. Doe was very upset and told her boyfriend that her safety concerns had not been taken seriously by Crowley. She told her boyfriend that if she did not go on the trip to Jacksonville with Blanco, she would get fired from Crowley. Together, they agreed to dip into their joint savings to gather approximately \$600 so that Ms. Doe could pay for taxi or Uber rides in Jacksonville in order to avoid being alone with Blanco during the trip.

XXIII. December 20, 2017: Three Weeks Before Blanco Sexually Attacks Ms. Doe in Jacksonville, Senobia Matute (HR Director for Central America) Delivers a Highly Disturbing Draft Investigation Report to Tiffany King Recommending "Immediate Actions" Be Taken Against Juan Emilio Blanco.

181. On December 20, 2017 at 10:22PM Crowley HR Director for Central America Senobia Matute emailed Crowley Global HR Director Tiffany King a draft investigation report conducted in response to three HR complaints made

against Blanco by his subordinates in Crowley's Inland Department via Crowley's EthicsPoint® web platform (Case #'s 280, 282, and 283).

182. Matute's short message to King was, "*For your revision and discussion. SM.*" The attached Word document was titled "*Ethics Point Investigation Report.*" The December 20, 2017 email from Matute to King, as well as the Investigation Report are attached hereto as "**Exhibit 8.**"

183. In her December 20, 2017 Investigation Report, Matute wrote, "*On December 12 and 13th I met with Trucking Group Employees reporting to Juan Blanco. I interviewed a total of 12 employees out of 13.*" Matute also wrote, "*Luis was the only person I couldn't talk to since he was on vacation and not reachable.*" **Exhibit 8.**

184. Deception and dishonesty on the part of Matute, Najera, and other Crowley HR and "Ethics" personnel was part of a company-wide pattern of behavior. For example, Matute wrote in her December 20, 2017 Investigation Report that she intentionally misled the Inland Department team members in the San Salvador office about the true purpose of her visit to their office, as well as the true purpose for her interviews with them. Instead of telling the team members she was there to investigate Blanco after Crowley had received 3 ethics complaints against him, in her Report, Matute wrote: "*The objective explained to the employees was that this is a common HR practice to meet with employees who occasionally sees, to*

generate confidence and trust and get to know them better. Confidentiality was guarantee of what they shared during our meeting.” Exhibit 8.

185. But confidentiality of what was shared by Inland Department team members during meetings with Matute was anything but guaranteed, as Matute herself acknowledged in her Investigation Report. In her Report, Matute wrote that Blanco was in the office while the investigation was taking place, and that Blanco was intimidating witnesses and actively tampering with Matute’s investigation. Matute wrote, “*He [Blanco] gave instructions that after being interviewed by me, they [the Inland Department subordinates] had to give him [Blanco] the report on what I asked and the answers they gave.*” **Exhibit 8.**

186. Regarding Jose Lopez, who was Blanco’s supervisor, in her December 20, 2017 Investigation Report, Matute wrote, “*Part of the group have the perception that Jose Lopez (Juan Blanco’s Supervisor) might be aware of some of the situations...and they don’t feel he will take actions with Juan Blanco since they [Blanco and Lopez] are very close.*” **Exhibit 8.**

187. Regarding Jose Lopez, Matute also wrote, “*One of the female employees mentioned that JB [Juan Blanco] have made inappropriate comments in front of Jose Lopez, and he [Jose Lopez] only laughs.*” **Exhibit 8.**

188. Regarding Blanco, Matute wrote, “*Female staff reported that Juan Blanco makes inappropriate jokes and sexual comments. They were very explicit on the*

comments he makes to them. They feel offended and harassed. They have been afraid of losing their jobs. Two mentioned that this was reported to local HR.”

Exhibit 8.

189. Regarding Blanco, Matute wrote, *“Several people reported that Luis Santamaria was bullied by Juan Blanco...They said that Luis is constantly offended by Juan Blanco’s comments.”* **Exhibit 8.**

190. Regarding Blanco, Matute wrote, *“Here are some of the literal comments and inappropriate things he [Blanco] has told the employees [when] Referring to other co-workers:*

191. *“Blanco calls female Crowley Nicknames of Pornstars, he said: ‘she looks like a pornstar.’”* **Exhibit 8.**

192. *“He calls Carla Seran ‘Fuck face.’”* **Exhibit 8.**

193. *“He frequently said on Friday, for all of you [today] is ‘Viernes de Puterias’ [meaning] ‘For you today is Slutty Friday.’”* **Exhibit 8.**

194. *“Other girl got flowers from her boyfriend, and he said: ‘Prepare your throat for tonight, you have to pay the price of those flowers’”* **Exhibit 8.**

195. *“When one of them came with a ponytail, he said: “I am sure you like it that way and your boyfriend too, it’s easier to grab you”* **Exhibit 8.**

196. *“He also has mentioned that boyfriends like to put their girls on their knees.”* **Exhibit 8.**

197. “*He does comments insulting homosexuals and refers to Luis, calling him in a denigrated way. Employees reported this is very constant with Luis.*” **Exhibit 8.**

198. In her December 20, 2017 Investigation Report, Matute concluded, “*There is an evident problem with Supervisor Juan Blanco. The comments that female personnel shared, are out of order and don’t comply with our Crowley’s values and culture. Immediate actions need to be taken with Juan Emilio Blanco. He does not comply with the values that Crowley promote.*” **Exhibit 8.**

199. Tragically, neither Tiffany King, nor anyone else at Crowley, heeded Matute’s warning, and a few weeks later, Blanco and Crowley transported Ms. Doe to the United States with Blanco on a DFTS training trip.

200. If King had taken “*Immediate Actions*” against Blanco, as Matute’s report recommended, Ms. Doe would have been spared the horror of being trafficked to the United States where she was sexually attacked by a man Crowley had been repeatedly warned about—a man even Crowley’s own HR Director had told the company was a sexual predator who presented an *immediate* danger to other Crowley employees.

XXIV. January 2018: Blanco Sexually Attacks, Assaults, and Terrorizes Ms. Doe on a DFTS Training Trip from El Salvador to Jacksonville.

201. On Sunday January 7, 2018, Ms. Doe flew from San Salvador, El Salvador to Jacksonville, Florida with Blanco and another Crowley employee named Ricardo.

202. Ms. Doe stayed at the Hotel Indigo Deerwood Park in Jacksonville, Florida. Crowley empowered Blanco to personally choose the hotel where Ms. Doe stayed in Jacksonville, and Ms. Doe was allowed no input on the decision. Upon arrival from the airport in Blanco's rental car, Blanco presented hotel staff with a Crowley corporate credit card to secure the rooms for Ricardo and Ms. Doe.

203. Before the trip to Jacksonville, Jose Lopez told Ms. Doe during a conference call that Blanco was experienced in travel to Jacksonville and that Ms. Doe should "*do whatever Juan says.*"

204. Ms. Doe was never told that Crowley had a Corporate Travel Manual, nor was she told to follow the policies and procedures of the Corporate Travel Manual. When she arrived in Jacksonville, Ms. Doe was not even given an access card to gain entry to Crowley's corporate headquarters in Jacksonville, FL and was required to wait for Blanco each time before entering Crowley's headquarters for DFTS training. Crowley had ensured that Ms. Doe was totally dependent on Blanco and controlled by him during her time in Jacksonville.

205. The DFTS training took place at Crowley's headquarters and generally lasted from about 8AM to 5PM. There were typically 3 Crowley employees conducting the DFTS training sessions Ms. Doe attended, with one of the trainers typically sitting in the audience. Including Ms. Doe, there were approximately 12-15 Crowley employees and contractors in attendance at the DFTS trainings.

206. Every morning, Blanco arrived at the Hotel Indigo where Ms. Doe and Ricardo were staying, picked both of them up in his rental car, and drove them to Crowley headquarters for the DFTS training. At the end of the day, Blanco drove Ms. Doe and Ricardo back to the Hotel Indigo. During these car trips, Blanco frequently made inappropriate sexual comments to Ms. Doe.

207. On or about the afternoon of Friday January 12, 2018, the first weekend of the Jacksonville business trip, Blanco's wife Caro invited Ms. Doe and Ricardo to dinner at Caro's house in Jacksonville. By that time, Caro, who was still employed by Crowley, had moved to from El Salvador to Jacksonville and was living in Jacksonville permanently.

208. Ms. Doe did not want to attend the dinner and did not want to spend any more time around Blanco. However, Blanco insisted that she attend the dinner and repeatedly refused her requests that he drive her back to her hotel. Because Jose Lopez had instructed Ms. Doe to "*do whatever Juan says,*" because Caro was also insisting that Ms. Doe attend the dinner, and because Crowley had purposely not given Ms. Doe her own rental car or other means of transportation, she was dependent on and controlled by Blanco and felt pressured to go to Caro's home for dinner.

209. The group departed Crowley headquarters at approximately 4:45PM on January 12, 2018 and arrived at Caro's house at approximately 7:20PM. On the

way to Caro's home, Blanco was driving, and he stopped at a store to buy wine, whiskey, and beer. The house where Blanco drove the group was located in Vilano Beach, Florida—south of Jacksonville near St. Augustine, Florida.

210. Once arriving at the home, Blanco and Ricardo began to consume alcohol, primarily whiskey. Blanco told Ms. Doe that he had purchased wine for her and Caro. Over the next few hours Ms. Doe witnessed Blanco and Ricardo drink large quantities of alcohol and saw that both became highly intoxicated. At some point that evening, Ricardo became so intoxicated that he passed out and went to sleep.

211. Given the sexual threats that Blanco had made to her in El Salvador regarding his intention to “get her drunk,” as well as the persistent and outrageous pattern of workplace sexual harassment Blanco had directed at her and her co-workers, Ms. Doe was terrified of drinking around Blanco. In Caro's home, she pretended to drink the wine served to her, and would occasionally take her glass into the bathroom and pour the wine into the sink or toilet. Throughout the course of the evening, Ms. Doe consumed less than one glass of wine in total and was never intoxicated.

212. After Ricardo passed out, Ms. Doe continued speaking with Caro while Blanco primarily focused on drinking whiskey while occasionally interjecting to voice negative and demeaning comments about various Inland Department team members.

213. Shortly before midnight, approximately 30 minutes after Ricardo passed out, Caro excused herself by saying that she was going to the bathroom, leaving Blanco and Ms. Doe alone on the house's outdoor terrace, which faced the street.

214. Ms. Doe was seated in a chair at a small table on the terrace, while Blanco was standing across from her. As soon as Caro left them alone, Blanco demanded that Ms. Doe give him her cell phone, which he believed contained "the naked pictures you send your boyfriend." Ms. Doe was shocked, terrified, and refused to show Blanco her phone.

215. Ms. Doe denied that her phone contained explicit sexual pictures of herself and refused to give Blanco the phone. However, Blanco continued to badger Ms. Doe, demanding that she give him her phone so that he could look at nude pictures of her.

216. Blanco then told Ms. Doe "you are delicious." When Ms. Doe remained silent and did not respond to Blanco's sexual remark, Blanco became menacing and threatening and again demanded to see nude photos on Ms. Doe's phone. Ms. Doe again refused to give Blanco her phone.

217. Blanco then began intrusively and threateningly staring at Ms. Doe's lips, then slowly and deliberately diverted his eyes down to her crotch in a manner that made Ms. Doe feel very uncomfortable and afraid. Ms. Doe was terrified, and she felt that Blanco intended to attack her.

218. Suddenly, Blanco lunged down toward Ms. Doe, who was still seated. He grabbed her and attempted to wrestle her phone away from her. Ms. Doe leaned back in her seat and quickly placed her phone behind her back. Blanco pressed his crotch into Ms. Doe's face, and Ms. Doe, in terror, struggled to stand up and fight him off.

219. As Ms. Doe struggled to stand up from her chair, Blanco pressed himself against Ms. Doe's breasts and torso. When she was able to stand up, Blanco pushed her backward and pinned her up against a wall where he continued to attack Ms. Doe, forcing his chest into her face and his crotch against her body while he groped and fondled her breasts and buttocks as he pretended that he was attempting to gain possession of her phone.

220. As Ms. Doe struggled to resist these repeated sexual batteries, she was terrified and knew that Blanco would not stop. With Ms. Doe pinned against the wall, with his body pressed against her own, Blanco continued to fondle and grope Ms. Doe's breasts, torso, and buttocks while he spoke to her. Blanco told her that he was attractive, and she was attractive, and he said, "*I'm your supervisor, and I can fuck anyone I want.*"

221. Pinned against the wall by Blanco's much larger body, with Blanco continuing to grope and fondle Ms. Doe under the pretense of attempting to rip her

phone from her hands, Ms. Doe begged Blanco to stop and repeatedly told Blanco that she had a boyfriend.

222. In the midst of this terrifying and prolonged struggle against her attacker, Doe and Blanco heard Caro suddenly approaching the terrace from inside the home. As Caro began to slide the terrace door open, Blanco abruptly stopped the assault and jumped back away from Ms. Doe. Ms. Doe was shaking and in shock.

223. As she stood shaking in terrified silence on the terrace, Ms. Doe knew that if Caro had not returned from inside the home when she did, she would have continued to be sexually assaulted and likely raped by Blanco.

224. Because it was then after midnight, and Ms. Doe was nearly an hour away from her hotel in Jacksonville, she was forced to spend the night at Caro's home under the same roof as her attacker.

225. The bedroom where she was sleeping had 2 doors. One led to the interior of the house, and the other door led out to the terrace. From the terrace there was a sliding door that entered the dining room, and also a door with a handle that entered a bedroom. Caro and Blanco told Ms. Doe that she would be sleeping in that bedroom.

226. Ms. Doe was terrified that Blanco would come into to her room and rape her during the night. For security, she jammed a chair under the door handles of both doors and wedged the chairs against the doors so that Blanco could not gain entry.

227. After Ms. Doe placed the chairs against the doors, she collapsed on the bed and began crying. She could not sleep that night, but instead stayed awake and vigilant. During the night, Ms. Doe saw Blanco out on the terrace, and then witnessed him attempting to open the door leading into Ms. Doe's bedroom. He could not open the door because of the chair Ms. Doe had wedged in front of the door.

228. Later, Ms. Doe also heard Blanco trying to open the opposite door that led into the interior hallway. Blanco was trying to be very quiet, and Ms. Doe assumed that was because he did not want to wake Caro. Ms. Doe was alone, completely vulnerable, and terrified.

229. The next morning after Caro awoke, Ms. Doe left the bedroom and entered the dining room. Blanco would not look Ms. Doe in the eye and was strangely and uncharacteristically quiet. Ms. Doe felt extremely uncomfortable and vulnerable and told Caro she was not feeling well in attempt to avoid a confrontation with her boss and his wife. She was so shaken that she could not eat breakfast, and the only thing she wanted to do was to return to her hotel.

230. On Sunday, Ms. Doe told Ricardo that Blanco had been extremely inappropriate with her the night before but was afraid to tell him the full extent of what she had endured. Ricardo apologized for getting drunk, passing out, and not

being available to protect Ms. Doe at Caro's house. Ricardo also promised Ms. Doe that he would protect her from Blanco during the remainder of the trip.

231. All during the next week of DFTS training, Ms. Doe felt intense pressure in her chest, and often wondered if she were on the verge of having a heart attack. Each morning she was forced to ride with Blanco from her hotel to Crowley headquarters for training, and each afternoon forced to ride in Blanco's car to return to her hotel. The constant apprehension of close quarters contact with her boss, controller, and attacker left her on the verge of panic attacks.

232. During car rides and during DFTS trainings at Crowley headquarters, Blanco continued to make outrageous sexual comments to Ms. Doe, and comments specifically about her own personal sexual life. During the DFTS training sessions at Crowley headquarters, Blanco would turn around during trainings, ignoring the material being covered, to stare threateningly at Ms. Doe to intimidate her into silence about the way he had behaved toward Ms. Doe at Caro's home. When Ms. Doe informed Ricardo of Blanco's actions, Ricardo began to place his own body as a shield between Ms. Doe and Blanco.

233. Finally, the two weeks of DFTS training ended and the time arrived for Ms. Doe to fly back to El Salvador. On the final day, Ms. Doe intentionally missed her flight to avoid traveling back to El Salvador with Blanco.

234. Ms. Doe returned from Jacksonville to El Salvador on a later re-booked flight on Saturday January 20, 2018. Her firm intention was to quit her job at Crowley when she returned to El Salvador.

235. She knew that Crowley did not care about her safety and that the company never would. She had already formally complained to Crowley HR and warned the company about Blanco, but they did nothing, so she felt she had no choice other than to try to find a new job.

236. Ms. Doe felt overwhelmed with conflicting emotions. She felt paralyzed as to how and what to tell her boyfriend. She thought everyone was going to blame her and shame her if she talked about what Blanco had done to her in Jacksonville. She felt guilty for going to Caro's house in the first place, even though she had been forced to go.

XXV. Upon Her Return to El Salvador from Jacksonville, Ms. Doe Files a Report With Crowley via EthicsPoint® Regarding What She Endured at the Hands of Known Sexual Predator Blanco.

237. When her boyfriend picked her up at the airport in San Salvador on January 20, 2018, Ms. Doe was fighting back tears as she struggled to tell him about Blanco attacking her and then the ensuing night of terror she endured as Blanco attempted multiple times to enter her bedroom.

238. However, Ms. Doe knew that her boyfriend owned a firearm, and she worried that her boyfriend might try to kill Blanco if he learned the full extent of

what Blanco had done to her. Her concern was not for Blanco's safety, but rather that her boyfriend might get in legal trouble. This concern caused her to downplay to a certain extent what she had been through in Jacksonville. However, she could not hide how she was feeling.

239. Inside of her boyfriend's truck in the parking lot at the airport, Ms. Doe believes she had a severe panic attack that included difficulty breathing, and she became overwhelmed by feelings of doom and a feeling that she might pass out.

240. Based on what Ms. Doe told him about what Blanco did to her in Jacksonville, her boyfriend encouraged her to use Crowley's EthicsPoint® platform to report Blanco, but Ms. Doe was hesitant and afraid. When Ms. Doe went to work on Monday January 22, 2018 at Crowley's San Salvador office, she told a manager from a different department some of what had happened in Jacksonville, and this Crowley manager also told her to report Blanco to Crowley via EthicsPoint®. Ms. Doe also saw Blanco in the office that day, and she was sickened and infuriated by the sight of Blanco walking around, making the same outrageously inappropriate comments, and acting in the same way he always did—fully confident in his own power and invincibility.

241. Ms. Doe called in sick to work on Tuesday January 23, 2018, because it was impossible for her to work in the same office as the man who had trafficked and sexually attacked her. She had no intention of ever returning to the Crowley office

or ever seeing Blanco again and thus felt that she had nothing to lose by making a formal report against Blanco. Because her boyfriend was sitting beside her when she logged on to Crowley's EthicsPoint® web platform and while she typed out the report, Ms. Doe again held back some details of what she had endured out of concern that her boyfriend would commit an act of violence against Blanco. Nonetheless, the report she did file via Crowley's EthicsPoint® platform was comprehensive, powerful, damning, and horrifying. Ms. Doe's report against Blanco was assigned EthicsPoint® Case #297 within Crowley, which is attached hereto as "**Exhibit 9.**"

242. In Crowley EthicsPoint® Case #297 Ms. Doe wrote that she was reporting her supervisor Juan Emilio Blanco. She wrote that the specific incident she was reporting had occurred on the evening of January 12, 2018. She also wrote, *"Before starting to describe my complaint, I would like to express how frustrated I feel at this point. I reported Juan[']s behavior in the past and his behavior has not changed at all since then. I'm extremely close to quit[ting] and get[ting] another job, [I'm] 90% sure of doing that and the only 10% that keeps me from doing it is a little hope I have by creating this report...To start, I would like to mention that Juan has not stop doing sexual comments about the girls from our department and the surrounding departments, he keeps calling them by porn star's nick names, sometimes they hear it, sometimes they don't, but this is not really why I'm*

submitting my report... I was on a training trip with him and another co-worker in Jacksonville, FL facilities (we left on 01/07 and came back on 01/20). On 01/12 evening, Juan's wife invited us to have dinner and stay (me and our co-worker). After dinner Juan and my co-worker started drinking a lot, while me and Juan's wife were talking. Later during the night our co-worker left to his own bedroom and Juan's wife stood up for a moment and went to a different room, leaving Juan and myself on the table. All of a sudden, he started asking me to show him pictures of myself, which I refused, and he attempted to grab my phone by force. I managed to stop him and then he looked at me and told me that I was really good looking and since he was the supervisor, he could have sex (he actually said he could fuck) with whoever he wanted. He told me that I was attractive and he was attractive too and now I knew what a supervisor can do (Is this really what supervisors are allowed to do? do they get this on their manual as part of the benefits of working in this company? or do they get any kind of training on this?), at this point I was in shock and told him that was inappropriate then started talking about my boyfriend to distract him from the topic. After about 10-15 min his wife came back and said it was already getting late so I immediately stood up and went to the room they had designated for me, I locked it and as soon as I laid down I started to cry. The next day, he wanted for us to stay at his house again but I refused, he told me that if it was that urgent he could take me to the hotel after midnight (was he looking for an

*opportunity to do something? part of the things he can also do as a supervisor perhaps?), I stood my ground and managed to have him take my coworker and me back to the hotel... The only reason why WE (MY CO-WORKER AND I) accepted his wife's invitation to come over to their place is because we understood that as hospitality and like one of ANY of the invitations we got from the rest of the personnel in US (going out at night to eat). I personally never thought he was pretending to make these extremely uncomfortable comments or take this to a worst scenario, I would have NEVER gone there and again, I'm extremely upset about this. I can't believe the stress and anxiety I get just by looking at his face and thinking that he sees me as a sex opportunity or being a potential victim of any other sexual offense, I can't stop crying since I started typing this. The following week [during DFTS Training] I blocked the event in my head because I wanted no distractions during [DFTS] training. When we came back to El Salvador I still had not processed what had happen until today that I saw him at work. **I seriously can't work with a sex offender and even worst having him as my supervisor.** I really hope to ring some bells and get a resolution to this problem before I find another job and lose that 10% of hope and trust I still have in this company. I really love my job and I really like what I'm doing, I like the company and I do believe that this is a place where I can grow and make a career in (I have even*

make sacrifices to work here, such as not taking school due to schedules) but there is no way that I share every day with a sexual offender.” Exhibit 9.

XXVI. In Response to Ms. Doe’s EthicsPoint® Report #297, Crowley Finally Decides to Fire Juan Emilio Blanco After Crowley HR Leader Tiffany King Concludes “We Can’t Afford to Have Another Complaint About Juan. It Appears that We Aren’t Taking the Employee Complaints Serious.”

243. After being attacked by Blanco in Jacksonville, Ms. Doe submitted her complaint against Blanco via EthicsPoint® on January 23, 2018 at 7:30PM. The report, assigned Case #297, was immediately received by VP of Ethics Arthur LaMoureaux, Crowley’s Global Director of Human Resources Tiffany King, Melvin Dodson, Zoraida Jirau, Crowley’s Director of Ethics and Compliance Greg Kencitzski, Senobia Matute, Susan Michel, and Heitzel Monroy. **Exhibit 9.**

244. At 7:39PM, only nine minutes after Ms. Doe submitted her report for Case #297, Tiffany King sent an email to Senobia Matute with the subject line, “*FW: New Case (#297) – Sexual Harassment.*” King’s January 23, 2018 email is attached hereto as, **Exhibit 10.**

245. King had *not* heeded Matute’s warning, issued more than a month earlier on December 20, 2017, that “*Immediate Actions*” needed to be taken against Juan Blanco. However, King was now calling for action—not to protect female employees from a sexual predator—but to protect Crowley’s reputation from “*another complaint*” the company couldn’t “*afford.*” **Exhibit 10.**

246. In her email to Matute, King wrote, *“This is a new Ethics Point complaint about Juan Blanco. Has Jose [Lopez] confirmed his availability to travel to El Salvador next week? If not, I would like to proceed with the termination this week and Jose can participate by phone. We can't afford to have another complaint about Juan. It appears that we aren't taking the employee complaints serious. Can we discuss our plan tomorrow morning? If needed, I will get Bob Weist involved to expedite this. Thanks.”* **Exhibit 10.**

247. The next day, on January 24, 2018, Tiffany King sent an email to Heitzel Monroy with the subject “Juan Blanco Termination.” King wrote, *“Senobia and I met this morning to discuss the immediate termination of Juan Blanco. Jacqueline Najera will conduct the termination discussion with Jose Lopez and Senobia on a conference call. The termination conversation will take place at 3:00pm today in El Salvador. I will contact the reporter [Ms. Doe] once the termination discussion is completed. Tiffany King.”* King’s January 24, 2018 email is attached hereto as, **Exhibit 11.**

248. The next day, on January 25, 2018, Tiffany King updated EthicsPoint® Case #297 (Ms. Doe’s) to reflect the fact that Blanco had been terminated. *“Conversation conducted with reporter [Ms. Doe],”* King wrote. *“Advised Juan Blanco was the subject of other cases and an investigation was recently completed by the HR team resulting in his termination. I shared my appreciation for speaking*

up and informed the reporter she can contact me in the future. Investigation closed.” Exhibit 9.

249. According to King’s note, as well as Ms. Doe’s recollection of their conversation, Tiffany King misled Ms. Doe by telling her that Crowley had already decided to terminate the employment of Juan Blanco before Ms. Doe made her report. King did not tell Ms. Doe that it was her precisely her report #297 that caused King and other high-ranking executives at Crowley to conclude the company could not “*afford to have another complaint about Juan.*” **Exhibit 10.**

250. Ms. Doe had already decided to quit her job at Crowley, but after learning that Blanco had finally been terminated by Crowley, Ms. Doe decided to return to work at Crowley.

251. Despite the horrific experiences they knew Ms. Doe had endured, neither Tiffany King nor anyone else at Crowley Maritime Corporation ever offered Ms. Doe any additional support or assistance related to the trauma she had obviously incurred throughout her tenure at the Company. Crowley simply expected her and the other victims of Blanco to “deal with it.”

XXVII. The Aftermath

252. After returning to the office following the termination of Blanco’s employment with Crowley, one day Ms. Doe ran into Crowley HR Director Senobia Matute, who casually thanked Ms. Doe for putting in a complaint against

Blanco. “*We took your complaint into consideration when we decided to fire Juan Blanco,*” Matute told Ms. Doe.

253. In response, Ms. Doe told Matute that she had previously warned Crowley HR Manager Jaqueline Najera that she was afraid of Blanco and afraid to travel with him. Ms. Doe further informed Matute that Najera had dismissed her safety concerns and told her that she could either go on the trip or find a new job.

254. Then Ms. Doe told Matute, “*next time, listen to women and take them seriously.*” After making this comment, Matute remained silent and then quickly ended the conversation by walking away.

255. Matute never apologized to Ms. Doe for what she had endured, never acknowledged the seriousness of the situation, never offered Ms. Doe assistance to deal with the inevitable trauma of suffering through such a terrifying experience, and never expressed any concern for Ms. Doe’s wellbeing. Like Tiffany King, Matute saw what happened to Ms. Doe and the other victims of Blanco only through the lens of protecting Crowley, not Crowley’s employees.

256. Soon, Ms. Doe began having nightmares about what Blanco had done to her in Jacksonville and began seeing a psychiatrist who eventually diagnosed her with Post Traumatic Stress Disorder (PTSD) from the time she spent working for Blanco and from the attack and night of terror in Jacksonville. To this day, Ms.

Doe continues to suffer from severe emotional trauma related to the events described in this complaint.

257. After Blanco was fired, Ms. Doe recalls that Jose Lopez complained loudly and bitterly to the Inland Department team in El Salvador that Blanco had been unjustly terminated, and told Ms. Doe and others that his good friend Juan Emilio Blanco had been “*set up*” by various female employees of Crowley.

258. This sentiment by Crowley DFTS Leader Jose Lopez that Blanco had been “*set up*” by female Inland Department employees is consistent with Lennys Campos’ May 1, 2018 Investigation Report into Jose Lopez’s management of the El Salvador Inland Department and DFTS teams. In that report, Campos wrote that Jose Lopez, “*blames employees for the firing of [the] team’s supervisor [Juan Blanco] [in January of 2018], [because] it creates more work for him.*” **Exhibit 2.**

259. After Blanco was fired, Crowley promoted Ms. Doe to a role as supervisor of the Documentation Department for the Defense Freight Transportation Services (DFTS) contract. Eventually, Ms. Doe became the supervisor of Vanessa Treminio who would later allege in a federal sex trafficking and forced labor lawsuit filed in this court in 2022 that Blanco had raped her in a hotel in Jacksonville, Florida only a few months before Blanco attacked Ms. Doe in Jacksonville on a subsequent, substantially similar Crowley-sponsored DFTS training trip.

260. Ms. Doe remembers a day in early to mid-2018 when Crowley employees from the Jacksonville and Puerto Rico offices arrived in El Salvador to check on progress around the implementation of the DFTS contract. At one point, one of the male employees from Puerto Rico pulled Ms. Doe aside and quietly said, “*How is Vanessa doing? I know about Blanco.*”

261. When Ms. Doe heard the man say, “*I know about Blanco,*” Ms. Doe got chills in her body. Even though the man had mentioned Vanessa, Ms. Doe thought he was referring to the attack and night of terror Ms. Doe herself had endured at Blanco’s hands in Jacksonville.

262. But then the man added, “*Just keep an eye on her mental health.*” With the additional comment, Ms. Doe realized the man meant he knew Vanessa Treminio had also been the victim of serious sexual abuse by Blanco. This information shocked Ms. Doe and left her wondering how many other women at Crowley may have been attacked by Blanco during his nearly 8 years with the company. She also wondered how many other people at Crowley had known all along that Blanco was a sexual predator, yet did nothing to limit his contact with female employees or take concrete steps to stop him.

263. After Blanco was fired on January 24, 2018, Lennys Campos became the new DFTS Manager and worked from Crowley headquarters in Jacksonville. But Jose Lopez still controlled the Admin team in El Salvador from his own office in

Jacksonville, and the toxic, abusive, misogynistic, and exploitative office and work culture that Lopez had carefully cultivated, and that Crowley had condoned and enabled over the course of years, did not change because of Blanco's termination.

264. In April of 2018, Campos was sent from Jacksonville to the San Salvador office to investigate ongoing issues and complaints related to Lopez's management of the team in El Salvador. As part of her investigation, Campos held "one-on-ones" with many of the Crowley employees working in the Inland Department and on the DFTS contract.

265. During her one-one-one meeting with Ms. Doe, Campos specifically asked Ms. Doe if she had any negative experiences with Blanco. In response, Ms. Doe told Campos that Blanco had been sexually inappropriate toward her from the first day she worked for him until the last day.

266. During their one-on-one, Campos told Ms. Doe that she had been sent to El Salvador specifically to interview employees about their experiences with Juan Blanco and Jose Lopez, and Campos told Ms. Doe she was shocked by the stories of abuse she had heard from the victims of Blanco, Lopez, Najera, and other Crowley employees. "*When I get back to Jacksonville, I'm going to have to write a very long email about all of this,*" Campos told Ms. Doe.

267. On May 1, 2018, less than two months before Jose Lopez announced his "resignation" from Crowley, and following her investigatory trip to the San

Salvador office, DFTS Manager Lennys Campos delivered an investigation report to Tiffany King and Bob Weist, Crowley's Vice President (VP), North America Transportation, regarding Lopez's management of the El Salvador Inland and DFTS departments." Jose Lopez reported directly to Weist, Lopez had reported directly to Weist for years, and Weist was ultimately responsible for the pattern of abuses described in Campos' report.

268. The formal report Campos delivered to King and Weist was titled "*DFTS [Defense Freight Transportation Services] RSM [Revenue Settlement Management] El Salvador Team Trip Report.*" **Exhibit 2.**

269. According to Campos' May 1, 2018 Trip Report, "*Jose Lopez has made sexist comments...when he wanted to hire a supervisor, Jose Lopez mentioned that he only wanted to interview men and that he did not want to interview women.*"

Exhibit 2.

270. According to Campos' May 1, 2018 Trip Report, "*Many [female] employees of Shared Services El Salvador would like to apply for the position of Trucking Brokerage supervisor but do not apply because Jose Lopez looks down on women.*"

Exhibit 2.

271. According to Campos' May 1, 2018 Trip Report, Jose Lopez told Inland Department and DFTS team members that "*women do not deserve to be supervisors or managers, [and] should not aspire to higher positions because they*

are too emotional, dumb, will embarrass him [and he is] sure that [a woman] won't do a good job.” Exhibit 2.

272. According to Campos’ May 1, 2018 Trip Report, “*One of the [team] members commented that he knows Mario Granada [Juan Blanco’s replacement] from another workplace...He realized that his sister worked in the same account with Mario, and in fact she was a victim of sexual harassment by him. She additionally commented that she had reported this [sexual harassment] to Jose Lopez in private...in a conference room and Jose Lopez did not listen to her and got angry and asked her to leave the conference room.” Exhibit 2.*

273. According to Campos’ May 1, 2018 Trip Report, “*Jose Lopez has told Mario and Pedro [the Supervisors] all the [misconduct] accusations that have been filed [against them by Inland Department and DFTS team members] and [Lopez] has warned them that they [HR/Ethics] will be investigating them.” Exhibit 2.*

274. According to Campos’ May 1, 2018 Trip Report, employees were “*afraid of retaliation from Jose Lopez,*” employees heard other employees make complaints and saw “*nothing has been done,*” employees were “*afraid to formally complain or report issues/behavior,*” employees were “*afraid Crowley HR might disregard complaints/issues (e.g., situation with Juan Blanco),*” because “*Management/HR*

are friends with Jose Lopez,” employees also said they “felt ready to give up,” felt “defeated,” and noted that it “took courage to ask to speak to someone.” Exhibit 2.

275. According to Campos’ May 1, 2018 Trip Report, employees felt *“stressed/pressured,” were “fearful of retribution,” felt “ignored, defeated, demoralized, degraded, disrespected, frustrated, disappointed with leadership & HR [&] employee assist/ethics line [and] expressed interest in [the] opportunity to move to another Crowley position [in order] to leave [Lopez’s] ADMIN group.”*

Exhibit 2.

276. According to Campos’ May 1, 2018 Trip Report, *“Jose Lopez (manager) create[s] and contribute[s] to a toxic work environment, used aggressive, offensive, and profane verbal language...Berating, yelling, cursing [at] team members (also described as bullying)...Retaliate[d] after employees raised issues/concerns...established and kept PIPs [Performance Improvement Plans] without proper follow up and use[d] [PIPs] to disqualify employee from raises, promotions, or job transfer opportunities...[was] dismissive, condescending, excluding/segregating and isolating women...[and] behaved unprofessionally and disrespectfully.” Exhibit 2.*

277. Again, According to Campos’ May 1, 2018 Trip Report, *“[Jose Lopez] blames employees for the firing of [the] team’s supervisor [Juan Blanco] [in January of 2018], [because] it creates more work for him.” Exhibit 2.*

278. In the early months of 2018, following her alleged rape by Blanco, Ms. Doe's then-subordinate, Vanessa Treminio, began to suffer severe emotional distress that had a tremendous negative impact on her emotional state and job performance. By June of 2018, Mrs. Treminio's emotional state had deteriorated to the point that Ms. Doe was required to hold a formal "one-on-one" meeting with Mrs. Treminio to discuss the emotional problems and deteriorating mental health Treminio was experiencing and how she could improve.

279. According to Crowley's own HR records obtained by Mrs. Treminio via her ongoing sex trafficking and forced labor lawsuit against Crowley, in early 2018, following her alleged rape by Blanco, Mrs. Treminio's personality had completely changed, and she had begun frequently bursting into tears in the office and experienced "*strong emotional breakdowns requir[ing] significant supervisory intervention.*"

280. The "one-on-one" intervention with Mrs. Treminio was conducted in a conference room in the El Salvador Office. Ms. Doe and Mrs. Treminio were physically present in the room, while Lennys Campos, who was Ms. Doe's supervisor, was present via speaker phone.

281. During her one-on-one, Mrs. Treminio told Ms. Doe and Campos that she was a recent victim of sexual abuse, and explained to Campos and Doe that the trauma from the sexual abuse was the reason she had suddenly begun suffering

such serious emotional problems. When the meeting concluded, Lennys Campos hung up, and it was only Ms. Doe and Mrs. Treminio left in the meeting. Ms. Doe then asked Mrs. Treminio if it had been Juan Blanco who had abused her. Mrs. Treminio responded that, yes, it was Blanco. In response, Ms. Doe told Mrs. Treminio that she understood, because Blanco had also done terrible things to her. Both women, survivors of Crowley-sponsored sexual abuse and sex trafficking at the hands of Juan Blanco, then hugged and began to cry together in the conference room.

FIRST CAUSE OF ACTION

(Sex Trafficking under 18 U.S.C. §§ 1591, 1595 *et seq.*)

Against JUAN EMILIO BLANCO

282. Plaintiff incorporates the allegations in paragraphs 1 through 281, as if fully set forth herein.

283. In violation of 18 U.S.C. § 1591, Juan Emilio Blanco knowingly, in or affecting interstate or foreign commerce, did recruit, entice, solicit, or transport Plaintiff knowing that means of force, threats of force, fraud, or coercion (or any combination thereof) would be used to cause Plaintiff to engage in any sex act on account of which anything of value would be given to or received by any person.

284. The statute of limitations for violations of the sex trafficking statute is 10 years. 18 U.S.C. § 1595. The Plaintiff was affected within the 10 years prior to filing suit.

285. Juan Emilio Blanco's actions knowingly affected interstate or foreign commerce when he, while serving as Plaintiff's supervisor and while acting within the scope of his authority as an agent of Crowley, did recruit, entice, solicit, and transport Plaintiff from San Salvador, El Salvador to Jacksonville, Florida on an official Crowley business trip that involved training on the Defense Freight Transportation Services (DFTS) contract.

286. While acting as an agent of Crowley and while acting within the scope of his authority, Juan Emilio Blanco personally selected Plaintiff for the trip to Jacksonville, Florida and personally selected the hotel where Plaintiff would stay while in Jacksonville. Blanco then secured Plaintiff's hotel room in Jacksonville using a Crowley corporate credit card issued to Blanco by Crowley. These actions by Blanco were ratified and approved by Crowley.

287. When Blanco recruited Plaintiff to accompany him on the international business trip, he did so knowing that he would use force, threats of force, fraud, coercion, or a combination thereof—as he had previously done with other vulnerable female Crowley employees (including Vanessa Treminio)—to sexually attack Plaintiff after isolating her in the United States.

288. Juan Emilio Blanco knowingly coerced Plaintiff into his scheme when he conspired with Crowley HR Manager Jaqueline Najera, senior manager Jose Lopez, Crowley VP Bob Weist, Crowley VP of Ethics and Compliance Arthur

LaMoureaux, and other Crowley agents and employees in the United States to use coercion and threats of serious harm to force Plaintiff to travel from San Salvador, El Salvador to Jacksonville, Florida for the official business trip. The threats of serious harm and coercion tactics were directly applied to Plaintiff by Blanco, Crowley HR Manager Jaqueline Najera, and others.

289. Ms. Doe expressed apprehensions and protestations to Crowley employee and agent Jaqueline Najera prior to the January 2018 business trip because she did not feel safe traveling with Blanco and was afraid he might sexually attack her while in the United States. Nevertheless, Blanco knew from experience, and from his participation in an active and ongoing conspiracy between Blanco, Najera, Jose Lopez, Bob Weist, Arthur LaMoureaux, and other Crowley employees and executives, to suppress reports of sexual misconduct committed by Blanco and to retaliate against victims who tried to report and stop Blanco's sexual misconduct, that Najera and other Crowley employees and agents would use coercion and threats of serious harm on his behalf to force Ms. Doe to participate in Blanco's scheme.

290. Blanco's actions in conspiring with Najera and other Crowley agents and employees to coerce Plaintiff into accompanying Blanco on the international business trip caused Plaintiff to reasonably believe that her failure to travel to Jacksonville with Blanco would result in serious harm to herself. As part of that

plan, Plaintiff was told by Najera that if she did not travel to Jacksonville with Blanco, her employment with Crowley would be terminated.

291. As Plaintiff was a young woman earning approximately \$8,000 per year in a developing country where equivalent office jobs were extremely difficult to obtain, Plaintiff reasonably feared that she would suffer serious professional and reputational harm as well as serious, potentially ruinous financial harm if she did not comply with Crowley's order to travel to Jacksonville with Blanco.

292. In exchange for agreeing to participate in what Blanco knew was a scheme in which he would use force, threats of force, coercion, or any combination of such means, to cause Plaintiff to engage in a sex act on account of which anything of value would be given to or received by any person, Plaintiff benefitted financially and received things of great value to her.

293. In exchange for agreeing to participate in Blanco's scheme, Plaintiff received a Crowley-sponsored 10-year U.S. travel visa that allowed her to travel back and forth to the United States. Plaintiff would never have been able to obtain this visa if she had not agreed to accompany Blanco on the trip to Jacksonville. This U.S. travel visa made her much more attractive to employers in El Salvador who also had offices or headquarters in the United States.

294. In exchange for agreeing to participate in Blanco's scheme, Plaintiff received round-trip travel to the United States, hotel accommodations, and meals.

She also received valuable training on a large U.S. Department of Defense logistics contract (DFTS) and was able to make valuable professional connections with senior employees at her company's headquarters in Jacksonville.

295. Plaintiff also received tangible job benefits. By complying with Crowley's order to travel to the United States with a man she warned Crowley she feared might sexually attack her during the trip, Plaintiff was allowed to continue her employment with Crowley and to continue receiving her salary and other employment benefits. Inherent in this dangerous and ultimately tragic forced-bargain, agreed to by Plaintiff only in the face of threats of serious harm and extreme duress, was the possibility of valuable career advancement within Crowley. This career advancement in fact materialized in the years following Plaintiff's sexual assault in Jacksonville when Plaintiff was promoted to manager, and then later to analyst. These promotions and the accompanying increases in salary and other tangible job benefits would not have materialized had Plaintiff not complied with Crowley's order to accompany a man Crowley knew was a sexual predator on an international business trip.

296. In Jacksonville, Blanco sexually attacked and assaulted Plaintiff and engaged in forced sex acts with her while attacking her at his wife's home. During the attack, Blanco pressed his crotch into Plaintiff's face, pressed himself against Plaintiff's breasts and torso, pushed Plaintiff backward and pinned her up against a

wall where he continued to attack Plaintiff, forcing his chest into her face and his crotch against her body while groping and fondling her breasts, torso, and buttocks. Blanco would have continued with his sexual attack and eventually raped Plaintiff, as he had allegedly already raped at least one other female Crowley employee, had Blanco's wife not appeared on the scene amid the attack.

297. Following the sexual batteries Blanco inflicted upon Plaintiff in Jacksonville, Blanco caused Plaintiff to spend a sleepless, terror-filled night alone in a bedroom within Blanco's wife's home while Blanco repeatedly attempted to gain entry to the bedroom in order to continue his sexual attack of Plaintiff.

WHEREFORE, by virtue of these violations of 18 U.S.C. §§ 1591, 1595, Plaintiff respectfully requests this Court to enter judgment against Defendant Juan Emilio Blanco for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

SECOND CAUSE OF ACTION

(Sex Trafficking under 18 U.S.C. §§ 1591, 1595 *et seq.*)
Against CROWLEY MARITIME CORPORATION

298. Plaintiff incorporates the allegations in paragraphs 1 through 281, as if fully set forth herein.

299. Plaintiff asserts two theories of § 1595(a) liability against Crowley: 1) perpetrator / principal liability, 2) venture / beneficiary liability.

300. The two theories of liability available to trafficking victims under Section 1595(a) are not mutually exclusive.

301. The statute of limitations for violations of the sex trafficking statute is 10 years. 18 U.S.C. § 1595. The Plaintiff was affected within the 10 years prior to filing suit.

Perpetrator / Principal Liability Claim

302. In violation of 18 U.S.C. § 1591, Crowley did knowingly, in or affecting interstate or foreign commerce, recruit, entice, solicit, or transport Plaintiff knowing that means of force, threats of force, fraud, or coercion (or any combination thereof) would be used to cause Plaintiff to engage in any sex act on account of which anything of value would be given to or received by any person.

303. Crowley's actions knowingly affected interstate or foreign commerce when Crowley did recruit, entice, solicit, and transport Plaintiff from San Salvador, El Salvador to Jacksonville, Florida for an official Crowley business trip that involved training on the Defense Freight Transportation Services (DFTS) contract.

304. For years prior to the January 2018 business trip during which Plaintiff was trafficked and sexually abused by Blanco, Crowley had known that its employee and agent, Juan Emilio Blanco, was a sexual predator who had sexually harassed

and abused numerous female Crowley employees within the Crowley offices, at Crowley-sponsored events, and while transporting female Crowley employees on Crowley-sponsored international business trips. Instead of firing Blanco, Crowley moved Blanco from its Procurement Department, where he left a trail of sexual abuse victims, to Crowley's Inland Department, where Crowley knowingly allowed him to start over with a new batch of future sexual abuse victims, including Vanessa Treminio and the Plaintiff.

305. While Blanco supervised the Inland Department, and prior to his management of the Inland Department, Crowley received numerous reports from female Crowley employees, including from Plaintiff, that Blanco had sexually harassed, sexually abused, or raped them. Most of these complaints were "covered-up" in the San Salvador office by Crowley HR Manager Jacqueline Najera, Inland Manager Jose Lopez, and others. However, some of these sexual misconduct complaints against Blanco eventually made their way into company-wide HR and Ethics complaint management systems that were managed by senior Crowley executives in the United States.

306. Instead of taking action against Blanco or reporting him to law enforcement, Crowley, as a systematic business practice designed to maximize profits, either threatened Blanco's victims into silence, or fired them while continuing to employ Blanco, because he was a "star performer" who drove profits for Crowley, in order

to protect the company's reputation and business relationships, and because Crowley saw Blanco's victims, all of whom were Salvadoran women, as powerless second-class corporate citizens who were without access to any legal recourse against the company's abusive labor practices. Despite Crowley's knowledge that Blanco was systematically preying on its female employees, Crowley continued to condone, enable, and facilitate Blanco's repeated sexual abuse of its own female employees while knowing that his attacks would and did continue.

307. During the week of November 13-17, 2017, when Crowley allowed Blanco to personally select Plaintiff to accompany him on an upcoming DFTS training trip to Jacksonville, Florida, Crowley knew that only days earlier, Crowley employee Vanessa Treminio had reported to Crowley—at Crowley's headquarters in Jacksonville, Florida—that Blanco had raped her in her Jacksonville hotel during a DFTS training trip on November 9 or 10, 2017. **Exhibit 1 ¶¶ 47, 48, 49, 50.**

308. According to Treminio's Amended Complaint, "*A young female employee from El Salvador [Treminio] walked into Crowley headquarters...distraught and in tears, complaining that her boss had raped her the night before and demanding to report the rape...It is inconceivable that knowledge of this event remained confined to Jose Lopez and one other Crowley employee. News of Plaintiff's ordeal and rape allegations likely reached the highest levels of Crowley leadership within a matter of hours.*" **Exhibit 1 ¶ 138.**

309. In a conference room within Crowley headquarters on November 10, 2017, Crowley employee and agent Jose Lopez gaslit Treminio, threatened her, and warned Mrs. Treminio to “*‘shut up’ about being raped if she wanted to keep her job.*” **Exhibit 1** ¶ 50. Treminio’s experience with Lopez was not the first or only time Jose Lopez had angrily dismissed a female Crowley employee’s sexual misconduct complaints against Blanco. According to Crowley employee and agent Lennys Campos’ May 1, 2018 Trip Report from her visit to Crowley’s San Salvador office, “*One of the [team] members...realized that his sister...was a victim of sexual harassment...She additionally commented that she had reported this [sexual harassment] to Jose Lopez in private...in a conference room and Jose Lopez did not listen to her and got angry and asked her to leave the conference room.*” **Exhibit 2.**

310. Crowley’s response to Treminio’s first report of being raped by Blanco—delivered to Crowley at Crowley headquarters on November 10, 2017—was to cover-up the felony sex crime allegation, assist Blanco in fleeing the United States later that same day, intentionally fail to notify law enforcement of the violent sex crime Treminio had reported to Crowley, ship Treminio off to Puerto Rico, and allow Blanco to return to the office in El Salvador so that he could select Plaintiff as his next sex trafficking victim.

311. Crowley has admitted, under oath in a sworn document filed with this court, that prior to Plaintiff's January 2018 DFTS business trip from El Salvador to Jacksonville during which Plaintiff was sexually attacked and abused by Blanco, Crowley Vice President of Ethics and Compliance Arthur LaMoureaux received Crowley employee Vanessa Treminio's 2nd report to Crowley, in which she detailed that she had been raped by Blanco during an earlier Crowley DFTS business trip in November of 2017. **Exhibit 7.**

312. Crowley has also claimed, under oath in a sworn document filed with this court, that the highest ranking "Ethics" executive at Crowley, a man who reported directly to CEO Thomas Crowley, decided to tell *no one* else at Crowley that he had received a formal, tearful report from a low-level Salvadoran Crowley employee being paid less than \$10,000 per year, in which she alleged that Blanco had recently raped her in Jacksonville during a DFTS training trip in November of 2017. Instead, Crowley has claimed, under oath in a sworn document filed with this court, that Crowley Vice President of Ethics and Compliance Arthur LaMoureaux kept Treminio's December 2017 rape allegation "*confidential*," chose to take no action against Blanco, and chose to subsequently allow Blanco to transport Plaintiff to Jacksonville on a subsequent DFTS training trip during which she was foreseeably sexually attacked and abused by Blanco, months after Crowley first learned of Vanessa Treminio's allegations. **Exhibit 7.**

313. On December 20, 2017, 3 weeks before Blanco attacked Plaintiff in Jacksonville, Crowley HR Director Senobia Matute delivered to Tiffany King, Crowley's global head of HR, a damning report on Juan Blanco that clearly described Blanco as a sexual predator who terrorized female Crowley employees. In her report, Matute warned Crowley's highest ranking Human Resources executive that, "*There is an evident problem with Supervisor Juan Blanco...Immediate actions need to be taken with Juan Emilio Blanco.*" Tragically, neither Tiffany King, nor anyone else at Crowley, heeded Matute's warning, and a few weeks later in January of 2018, Blanco and Crowley transported Ms. Doe to the United States with Blanco on a DFTS training trip during which she was sexually trafficked and sexually abused by Blanco.

314. The actions and inactions of Jacqueline Najera, Jose Lopez, VP of Ethics Arthur LaMoureaux, Global HR Leader Tiffany King, and other Crowley executives, employees and agents regarding Blanco's corporate-sponsored sexual abuse of Crowley's female employees can only be described as a series of related corporate "**cover-ups.**" These cover-ups were carried out by agents and employees of Crowley acting within the actual or apparent scope of their employment or authority, and were designed to protect not only Crowley employee and agent Juan Emilio Blanco, but to protect the reputation and profits of Crowley Maritime Corporation.

315. A claim for sex trafficking under the TVPA requires that Plaintiff allege she was forced to engage in a “*commercial sex act*,” defined as “*any sex act on account of which anything of value would be given to or received by any person.*” In ¶¶ 290-295 of this complaint, Plaintiff states numerous “things of value” received by her in return for going on an international business trip with a man she warned Crowley had subjected her to humiliating and terrifying sexual harassment, and whom she did not feel safe traveling with on an international business trip.

316. In addition to the above referenced things of value received by Plaintiff, Crowley Maritime Corporation also benefitted and received things of value from the trafficking of Plaintiff and her sexual abuse. Specifically, Crowley benefitted financially from the corporate **cover-up** of Vanessa Treminio’s allegations against Blanco, made to Crowley in November and then again in December of 2017, that Blanco had raped Treminio in a hotel room in Jacksonville during a Crowley-sponsored business trip in November 2017. If Crowley VP of Ethics Arthur LaMoureaux handled Treminio’s December 2017 rape allegations against Blanco in an ethical manner instead of keeping the allegations “confidential” as part of an obvious effort to cover-up the crime, Plaintiff would never have been trafficked and sexually abused by Blanco in January of 2018.

317. The benefit to Crowley of keeping Vanessa’s Treminio’s November and December rape allegations against Blanco “confidential” were obvious, and in

Treminio's amended complaint, she recounts that during the call with Crowley VP of Ethics Arthur LaMoureaux during which she reported being raped by Blanco during a November 2017 business trip, LaMoureaux *"told Mrs. Treminio that if her story ever became public, it could severely damage the company's reputation and tarnish its relationship with the U.S. government, which was one of the company's largest and most important customers. In that call, Mr. LaMoureaux specifically mentioned Crowley's "Defense Freight Transportation Services (DFTS)" contracts, which were worth billions of dollars, and the emergency response contracts for hurricane relief in Puerto Rico. Mr. LaMoureaux inelegantly explained that these contracts paid Mrs. Treminio's salary and the salaries of many other Crowley employees, and that a clean public image was very important to Crowley in maintaining those contracts and the relationships they were built on."* **Exhibit 1 ¶¶ 70, 71, 72, 73.**

318. A direct, causal relationship therefore exists between the benefits and value received by Crowley in connection with its cover-up of Treminio's rape allegations against Blanco, made to Lopez and LaMoureaux, in November and December of 2017, and the sexual abuse Plaintiff endured at the hands of Blanco in January of 2018. But for that cover-up, Plaintiff would not have been sexually abused by Blanco in January of 2018. Crowley made the conscious decision, at the highest levels of its company, to allow Blanco to continue trafficking and sexually abusing

its vulnerable Salvadoran female employees on international business trips in order to protect its corporate reputation, government contracts, and profits.

319. Through common law theories of vicarious liability, Crowley is liable as a Principal/Perpetrator for the negligent, tortious and criminal misdeeds of its executives, employees and agents involving trafficking Plaintiff, because multiple Crowley agents and employees acted within the actual or apparent scope of their employment or authority, and some of these agents intended, at least in part, to in some way benefit Crowley Maritime Corporation through their actions.

Venture / Beneficiary Liability Claim

320. In violation of 18 U.S.C. § 1591, Crowley Maritime Corporation (“Crowley”) did knowingly benefit, financially or by receiving anything of value, from participation in a venture of two or more individuals associated in fact, in or affecting interstate or foreign commerce, in which Plaintiff was recruited, enticed, harbored, transported, or obtained by any means, when Crowley knew, or was in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause the Plaintiff to engage in a commercial sex act.

321. The statute of limitations for violations of the sex trafficking statute is 10 years. 18 U.S.C. § 1595. The Plaintiff was affected within the 10 years prior to filing suit.

322. To state a venture or beneficiary claim under § 1595(a), Plaintiff must plausibly allege that defendant Crowley (1) knowingly benefited, (2) from taking part in a common undertaking or enterprise involving risk and potential profit, (3) that undertaking or enterprise violated the TVPA as to Plaintiff, and (4) Crowley had constructive or actual knowledge that the undertaking or enterprise would violate the TVPA as to the plaintiff.

323. The participation element of a beneficiary claim under § 1595(a) does not require Crowley to have participated in the sex trafficking act itself. Participation in a venture only requires that Defendant Crowley took part in a common undertaking or enterprise with co-Defendant Juan Emilio Blanco that involved risk and potential profit.

324. By employing Blanco for years and promoting him to an important role in the company where he was responsible for managing a large team of Crowley employees and responsible for the implementation of key parts of a multi-billion-dollar contract with the U.S. Department of Defense, Defendant Crowley and Defendant Blanco were participants in a common undertaking or enterprise that involved risk and potential profit. The DFTS training trips to Jacksonville, Florida during which Blanco raped Vanessa Treminio and sexually attacked and attempted to rape Plaintiff were also common undertakings or enterprises that involved risk and potential profit in which both Crowley and Blanco were participants. Crowley

knowingly benefitted from its ongoing business relationship with Blanco and from the DFTS training trips.

325. The common undertakings or enterprises described in ¶ 324 of this complaint violated the TVPA as to Plaintiff, as she was forced to engage in a “*commercial sex act*,” defined as “*any sex act on account of which anything of value would be given to or received by any person.*” In ¶¶ 290-295 of this complaint, Plaintiff states numerous “things of value” received by her in return for going on an international business trip with a man she warned Crowley had subjected her to humiliating and terrifying sexual harassment, and who she warned Crowley she did not feel safe traveling with on an international business trip.

326. In ¶¶ 316-317 of this complaint, Plaintiff details the things of value received by Crowley in connection with the sexual abuse she endured at the hands of Blanco in January of 2018. In ¶ 318 of this complaint, Plaintiff states that a direct, causal relationship exists between the benefits and value received by Crowley in connection with its cover-up of Treminio’s rape allegations against Blanco, made to Lopez and LaMoureaux, in November and December of 2017, and the sexual abuse Plaintiff endured at the hands of Blanco in January of 2018. But for that cover-up, Plaintiff would not have been sexually abused by Blanco in January of 2018. Had LaMoureaux reported Treminio’s rape allegations to law enforcement, or otherwise conducted a proper investigation of Treminio’s allegations instead of

keeping the reported rape “confidential,” Plaintiff would not have been trafficked and sexually abused by Blanco in January of 2018.

327. Crowley had constructive and actual knowledge that the undertaking or enterprise would violate the TVPA as to Plaintiff. Constructive knowledge is knowledge which one using reasonable care or diligence should have. Constructive knowledge is a negligence standard. Based on the many facts contained in the Exhibits attached to this Complaint, Crowley *actually knew and should have known* that its undertaking or enterprise with Blanco would violate the TVPA as to the Plaintiff, Ms. Doe.

328. Due to Vanessa Treminio’s prior allegations and the numerous reports and investigations documented by Crowley, Crowley actually knew, and should have known, that its undertaking or enterprise with Blanco would violate the TVPA as to Plaintiff.

WHEREFORE, by virtue of these violations of 18 U.S.C. §§ 1591, 1595, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley Maritime Corporation for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

THIRD CAUSE OF ACTION
(Sexual Battery)
Against JUAN EMILIO BLANCO

329. Plaintiff incorporates the allegations in paragraphs 1 through 281, as if fully set forth herein.

330. Juan Emilio Blanco sexually attacked Plaintiff in his wife's home and fondled, touched, and groped her for his own sexual gratification.

331. Juan Emilio Blanco's tortious conduct was harmful and offensive and caused Plaintiff injury, damage, loss, and harm.

332. Under Florida law, an action for assault, battery, false arrest, malicious prosecution, malicious interference, false imprisonment, or any other intentional tort must be commenced within 4 years. Fla. Stat. § 95.11.

333. After sexually attacking Plaintiff in Jacksonville, Florida, Juan Emilio Blanco fled the State of Florida and the United States and flew to El Salvador. Defendant Crowley Maritime Corporation assisted Juan Emilio Blanco in his flight from the state and from justice.

334. Florida law provides that the applicable 4 year statute of limitations is tolled by the absence from the state of the person to be sued. Fla. Stat. § 95.051.

335. Upon information and belief, Juan Emilio Blanco remained in El Salvador, outside of the jurisdiction of the United States, or outside of the state of Florida

long enough to toll the statute of limitations for civil claims against Juan Emilio Blanco in this lawsuit arising out of his sexual battery of Plaintiff in January 2018.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Juan Emilio Blanco for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

DEMAND FOR JURY TRIAL

Plaintiff respectfully demands a trial by jury for all issues so triable in this action.

Dated April 3, 2023

Respectfully submitted,

/s/ Adria G. Notari
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**pro hac vice application forthcoming*

Exhibit 1

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

CASE NO.: 3:22-cv-174-MMH-PDB

VANESSA TREMINIO,

Plaintiff,

vs.

CROWLEY MARITIME CORPORATION,
and JUAN EMILIO BLANCO,

Defendants.

AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 15(a)(1)(B), the Plaintiff VANESSA TREMINIO, by and through her undersigned counsel, hereby files this Amended Complaint for damages and Demand for Jury Trial against Defendants CROWLEY MARITIME CORPORATION and JUAN EMILIO BLANCO.

JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343, as this action asserts violations of 18 U.S.C. § 1591, *et seq.*, and therefore raises federal questions regarding the deprivation of Plaintiff's rights. The Court has supplemental jurisdiction over Plaintiff's related claims arising under state law pursuant to 28 U.S.C. § 1367(a).

2. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this Court because a substantial part of the events or omissions giving rise to this action occurred in this District.

PARTIES

3. Plaintiff Vanessa Treminio is a former employee of Crowley Maritime Corporation and a citizen and resident of the country of El Salvador.

4. Defendant Crowley Maritime Corporation is a Delaware corporation with a principal place of business located in Jacksonville, Florida.

5. Defendant Juan Emilio Blanco is a former employee of Crowley Maritime Corporation and, upon information and belief, a citizen and resident of the country of El Salvador.

FACTUAL ALLEGATIONS

I. Mrs. Treminio Joins Crowley Maritime Corporation

6. Mrs. Treminio began working for Crowley in March of 2012, when she was 21 years old. Mrs. Treminio was hired by Crowley Shared Services, S.A., a wholly owned subsidiary of Crowley Maritime Corporation.¹

7. Crowley maintains a large presence in El Salvador where it employs hundreds of workers through wholly owned subsidiaries.

¹ <https://www.sec.gov/Archives/edgar/data/1130194/000095012307003017/y30961exv21.htm>

8. Due to her talents, experience, and her ability to speak both English and Spanish, Mrs. Treminio initially was hired by Crowley as a “credit and collections coordinator.” Her daily tasks included sending billing statements to Crowley customers in the United States and interfacing with those clients regarding payments and reconciliations for transportation services provided by Crowley.

9. After approximately 2.5 years with Crowley, due to superior performance, Mrs. Treminio received her first promotion and subsequently began handling top Crowley customer accounts, such as those of General Motors, Toyota, and Chiquita. In this role, Mrs. Treminio was responsible for alerting these companies of when they were reaching their credit limits, and delivering notifications of when the clients’ bills for transportation services were becoming due.

II. Mrs. Treminio Travels to Miami and Is Later Promoted to the Inland Department

10. In 2015, Crowley sent Mrs. Treminio on her first international business travel assignment. Crowley flew Mrs. Treminio from her home in El Salvador to Miami, Florida where she spent 3 weeks working on a project to integrate a new business unit Crowley had acquired in South Florida.

11. In 2017 Mrs. Treminio received another promotion and was transferred to Crowley’s “Inland Department” where she became a member of a team of approximately 15 Crowley employees. Her direct supervisor at the Inland Department was Defendant Juan Emilio Blanco.

12. As soon as Mrs. Treminio began working for Juan Emilio Blanco, Blanco began subjecting her to a pattern of workplace sexual terror. Mr. Blanco's sexual harassment and sexual abuse of Mrs. Treminio and others within the Crowley offices were severe and pervasive, and his outrageous conduct fostered a hostile, abusive, and offensive work environment.

III. Crowley Knew Juan Emilio Blanco Was a Sexual Predator

13. Most troublingly, Crowley was well aware of Mr. Blanco's abhorrent workplace behavior even before assigning Mrs. Treminio to his team. It was well known by all Inland Department team members, as well as by members of Crowley HR and other senior leaders at Crowley, that Mr. Blanco had been transferred to the Inland Department after several subordinates from his former department filed claims against him for workplace sexual harassment and sexual assault. However, because Mr. Blanco was a "star performer," and because of his ability to drive profits for Crowley, Crowley simply transferred Blanco to a new team instead of terminating his employment.

14. Mr. Blanco used a group chat on the WhatsApp messenger service to communicate with his subordinates in the Inland Department, including Mrs. Treminio. In this Crowley group chat, Mr. Blanco unleashed a staggering number of sexually inappropriate comments. To mention only one example, on a Friday, as the Inland Department team was preparing for the weekend, Mr. Blanco directed

disgusting homophobic remarks to a male member of the team named “Juan.” Mr. Blanco believed that Juan was “gay,” and wrote to the team, “*Juan, it’s Friday, tonight you can go suck some dicks and look for those she-males that you like.*”

IV. Mrs. Treminio is Notified By Crowley that She Will Be Required to Travel to Jacksonville, Florida on a Business Trip with Juan Emilio Blanco, Her Supervisor

15. In mid-October of 2017 Crowley notified Mrs. Treminio that she would be required to travel to Crowley corporate headquarters in Jacksonville, Florida on a business trip. Juan Emilio Blanco was the Crowley manager who first told Plaintiff she was required to travel to Jacksonville, and Blanco told Plaintiff she would be accompanying him. Blanco also told Plaintiff that in Jacksonville she would be assisting with the implementation of a new and very important contract Crowley had signed with the U.S. government.

16. Mrs. Treminio was told the new contract was called the U.S. Department of Defense “Defense Freight Transportation Services (DFTS)” contract, which was awarded to Crowley by the U.S. government in July 2017. The DFTS contract was one of the largest logistics contracts ever awarded to a company by the U.S. government, and its total value was approximately \$2.3 billion.

17. Later, Crowley told Mrs. Treminio that she would be accompanying her supervisor, Juan Emilio Blanco, and one other female Crowley employee on the trip.

Mrs. Treminio was told that she would receive an email from Crowley's corporate travel department with her travel itinerary within the next few days.

18. On October 24, 2017 Mrs. Treminio received her travel itinerary for the trip to Jacksonville from Crowley Travel Services. The itinerary stated Mrs. Treminio was scheduled to depart El Salvador on November 5, 2017 and return to El Salvador on November 10, 2017.

19. Per standard Crowley procedures for overseas travel, approval for the upcoming trip to Jacksonville came from senior employees at Crowley corporate headquarters in Jacksonville, Florida. Crowley senior employees involved in approving the decision to send Mrs. Treminio to Jacksonville with a man who was already known to Crowley to be a sexual predator who had preyed on vulnerable women within the Crowley offices included Steve Collar, Senior Vice President; Bob Weist, Vice President of Land Transportation; and Jose Lopez, who was Juan Emilio Blanco's direct supervisor.

V. **Juan Emilio Blanco Sexually Assaults Mrs. Treminio In the Crowley Office**

20. After Mrs. Treminio was told that she would be required to travel to Jacksonville with Mr. Blanco, but before she departed on the trip, Mr. Blanco sexually assaulted Mrs. Treminio in the Crowley offices.

21. On the day she was sexually assaulted by Mr. Blanco, Mrs. Treminio left her desk and went downstairs and outside to smoke a cigarette. When she finished, she

returned inside the building and walked into the elevator with Mr. Blanco, who was coming back to the office after his lunch break. The only occupants of the elevator were Mrs. Treminio and Mr. Blanco.

22. Mrs. Treminio had recently achieved significant success in collecting bills from clients, and inside the elevator Mr. Blanco congratulated her professional success, but in a completely disgusting manner. Mr. Blanco said, “*Vanessa, I saw you billed over \$25,000! You deserve the ‘Vitamin-D.’*” When Mrs. Treminio asked Mr. Blanco what he meant by “Vitamin-D,” he responded “*You know, the vitamin of my dick.*”

23. As he made these disgusting remarks to Mrs. Treminio, Mr. Blanco reached out, grabbed one of her breasts, and then shook her breast up and down as if he were shaking someone’s hand. Mrs. Treminio jumped away from Blanco and said “*Do you think I’m some kind of whore? You can’t do that to me.*” Mr. Blanco simply laughed at her in response.

VI. Mrs. Treminio Immediately Reports the Sexual Assault to Crowley HR Manager Jaqueline Najera and in Response is Threatened with Extreme Acts of Retaliation by Najera and Juan Emilio Blanco

24. After being sexually assaulted in Crowley’s elevator by Mr. Blanco, Mrs. Treminio was furious and afraid. She went directly from the elevator to the Human Resources office and told Jaqueline Najera, the Crowley Human Resources manager, that she wanted to make a formal HR claim against Juan Blanco. Mrs. Treminio even

lowered her shirt and showed Jaqueline Najera the visible impressions of Mr. Blanco's fingers, still imprinted upon her breast.

25. Instead of expressing outrage that a Crowley supervisor had sexually assaulted a young woman in the Crowley office, and instead of helping Mrs. Treminio file an HR complaint, Najera began intimidating Mrs. Treminio, threatening her, and gaslighting her.

26. First, Najera told Mrs. Treminio that the cameras in the elevator did not actually work, and therefore "*it will be your word against his.*" When Mrs. Treminio told Najera that she still wanted to file the HR complaint, Najera responded by saying, "*Vanessa, you have to understand that we live in a 'Latin culture,' and so if you file a HR complaint, the people higher up at Crowley headquarters who review your complaint will not believe you, and they will think that you must have done something that provoked him.*"

27. When Mrs. Treminio was not dissuaded from filing a complaint by this intentional gaslighting from the HR manager, Najera then began to threaten Mrs. Treminio. Najera warned Mrs. Treminio that she "*needed to be careful,*" because Crowley senior leadership in the United States "*loved*" Juan Emilio Blanco and that Blanco was seen as a "*star*" employee.

28. Then, in no uncertain terms, Jaqueline Najera explicitly threatened retaliation if Mrs. Treminio continued to talk about being sexually assaulted by Mr. Blanco.

Jaqueline said, “*Vanessa, you need to remember that you are a single mom, and you need to think about your son. Do you want him to know mommy for her successful career, or for getting fired for talking about a sexual situation that cannot be proven?*”

29. Mrs. Treminio was shaken, confused, and terrified by her interactions with Crowley HR Manager Jaqueline Najera. Mrs. Treminio then told Najera that did not feel safe traveling to Jacksonville, Florida with Mr. Blanco because she feared he would take advantage of her isolation and vulnerability in a foreign country in order to sexually assault her again. Accordingly, Mrs. Treminio begged Najera to at least make an accommodation for her safety and begged Najera to replace her on the trip with someone else.

30. Mrs. Najera told Mrs. Treminio that, despite the sexual assault and despite Blanco’s known history of sexual misconduct against female Crowley employees, Mrs. Treminio was still required to go on the trip to Jacksonville with Mr. Blanco and that no accommodation for her safety would be made. Najera told Mrs. Treminio that her only other options were to go on the trip to Jacksonville with Blanco or be fired.

31. Mrs. Najera then told Mrs. Treminio that if she quit her job with Crowley or were fired because of her allegations of sexual assault against Mr. Blanco, or because of her refusal to accompany Mr. Blanco on the trip to Jacksonville, Mrs. Najera

would make it impossible for Mrs. Treminio to secure a new job at a different company. Najera told Mrs. Treminio that if she left Crowley voluntarily or involuntarily, Najera would ensure that any future potential employer of Mrs. Treminio's who contacted Crowley in the course of performing employment history or reference checks on Mrs. Treminio would be provided with extremely negative feedback about Mrs. Treminio's character and job performance.

32. In the face of these extreme and shocking threats, Mrs. Treminio backed down, and left the HR office in order to return to her own office on the 5th floor. When Mrs. Treminio arrived at her work station, she was shocked to find Juan Emilio Blanco sitting on her desk. Crowley HR had already alerted Mr. Blanco about the sexual assault allegation and about Mrs. Treminio's pleas to be excused from international travel with Mr. Blanco, and Blanco was now stalking Mrs. Treminio.

33. As Mrs. Treminio approached her desk, Mr. Blanco began to interrogate her and mock her. "*Vanessa, what did you gain by getting HR involved?*" he asked her. Mr. Blanco was relaxed and laughing at Mrs. Treminio. "*Remember, Vanessa,*" Blanco threatened, "*you're a single mom. When your kid goes hungry, remember that. You better cooperate, or you will get fired in a snap.*"

34. Mr. Blanco then told Mrs. Treminio that if she were to be fired or were to quit her job with Crowley, Blanco repeated the same threats that Najera had already made to Mrs. Treminio. Blanco told Mrs. Treminio that if she quit her job with Crowley

or were fired because of her allegations of sexual assault against Mr. Blanco, or if she left the company because of her refusal to accompany Mr. Blanco on the trip to Jacksonville, he would ensure that Mrs. Treminio would not be able to secure a new job at a different company following her departure.

35. Blanco told Mrs. Treminio that if she were to leave Crowley voluntarily or involuntarily, he would provide extremely negative feedback about her job performance and her character to future potential employers who called Crowley when performing employment history and reference checks on Mrs. Treminio, and he would ensure that everyone else at Crowley did the same.

36. Finally, Mr. Blanco told Mrs. Treminio that he was not someone she wanted for an “*enemy*,” and he then continued laughing as he turned and walked away from Mrs. Treminio’s desk.

VII. Crowley Forces Mrs. Treminio to Accompany Juan Emilio Blanco on a Business Trip to Jacksonville, Florida Despite Her Protestations That She Did Not Feel Safe

37. After Mr. Blanco sexually assaulted Mrs. Treminio in the elevator, there were still several days remaining before she was scheduled to leave on the business trip to Jacksonville. Mrs. Treminio remained terrified of the prospect of traveling overseas with her abuser, a man she had already reported to HR for sexually assaulting her in the Crowley offices. In a desperate attempt to avoid the trip, Mrs. Treminio again pleaded with Jaqueline Najera and the Crowley HR department. She

again told Najera that she did not feel safe traveling with Mr. Blanco because he had already sexually harassed and assaulted her.

38. The response of the HR manager was cold. The HR manager told Mrs. Treminio that she was required to travel according to Crowley's needs, and that refusing to make the trip with Mr. Blanco would be a violation of her employment contract with Crowley. When Mrs. Treminio responded that safety was Crowley's "number one core value," and reiterated that she did not feel safe going on the trip with Blanco, the Crowley HR manager then responded with a merciless and dangerous threat. The HR manager made it clear that there would be no discussion, and again told Mrs. Treminio she had 2 options: 1) go on the trip to Crowley headquarters in Jacksonville, Florida with Mr. Blanco; or 2) have her employment with Crowley terminated.

39. Mrs. Treminio could not afford to lose her job and was forced to comply. Despite the known threat and danger of traveling with Mr. Blanco, Crowley threw Mrs. Treminio to the lions and forced her to accompany her supervisor, who had already sexually harassed and assaulted her, on the trip to Jacksonville.

VIII. Mr. Blanco Rapes Mrs. Treminio at their Hotel in Jacksonville, Florida

40. Mrs. Treminio left El Salvador and arrived in Jacksonville, Florida on Sunday November 5, 2017, on United Airlines flight UA2101. In Jacksonville Mrs. Treminio was directed by Crowley to stay in the same hotel as Mr. Blanco. Blanco

paid for all the hotel rooms—including Mrs. Treminio’s—using his Crowley corporate credit card. The hotel was the “Courtyard by Marriott Jacksonville I-295/East Beltway,” located at 9815 Lantern St., Jacksonville, FL 32225.

41. Thursday November 9, 2017 was the final night of the business trip. That evening after dinner, Mrs. Treminio returned to her hotel room alone to pack, relax, and then get a good night’s sleep. After watching television alone in her room, Mrs. Treminio turned off the lights and went to sleep. She had not consumed any alcohol that night and was completely sober.

42. Mr. Blanco’s final night in Jacksonville was very different. He went out drinking with other Crowley employees, including Jose Lopez, his friend and supervisor, who worked out of Crowley’s corporate headquarters in Jacksonville. These Crowley employees stayed out late, and Juan Blanco returned to the hotel intoxicated. Upon his arrival, Mr. Blanco went to the hotel’s front desk and told the hotel staff that he had lost the access card to his room. When the staff asked for his room number, Blanco told them Mrs. Treminio’s room number instead of his own. When asked for proof that it was his room, Blanco showed the hotel staff the Crowley corporate credit card he had used to pay for the room. The hotel staff then gave Mr. Blanco an access card to Mrs. Treminio’s hotel room.

43. Mr. Blanco proceeded to Mrs. Treminio’s hotel room and used the access card to gain entry. As Blanco entered the darkened room, Mrs. Treminio was asleep on

her stomach in her bed. The first thing she remembers is being awoken by the feeling of someone on top of her, and then realizing that her vagina was being roughly penetrated. When she looked up, she saw that Mr. Blanco on top of her, violently raping her.

44. Juan Emilio Blanco forcibly raped Mrs. Treminio. She screamed out in pain for Mr. Blanco to stop and get off of her. She tried to use her right hand to move Blanco off of her, and tried to move her body away, but he forcefully pinned her to the bed with the weight of his body and with his arms, preventing her from escaping.

45. Mr. Blanco told Mrs. Treminio to stop screaming and then pressed his hand over her mouth to silence her as he continued to forcibly rape her. As tears streamed down Mrs. Treminio's face, she bit Mr. Blanco's hand as hard as she could, causing him to scream in pain and momentarily remove his hand from her mouth. Mrs. Treminio was begging and pleading for Blanco to stop. She told him that she was a mother, she reminded him that he also had a child, and she told him that he was hurting her.

46. Suddenly, Mr. Blanco jumped off of Mrs. Treminio and began apologizing. *"I'm sorry, I'm sorry, I got confused, please, my friend I'm so sorry,"* he said to her. Mr. Blanco then quickly put on his underwear and pants, and continued apologizing to her, calling her his friend, and telling her that he was confused. After he finished dressing, he dashed out of her room.

IX. Mrs. Treminio Goes to Crowley's Corporate Headquarters to Report the Rape And Is Threatened to Remain Silent About the Assault By Crowley Managers

47. The morning after being raped, which was Friday November 10, 2017, Mrs. Treminio left the hotel and went directly to Crowley's corporate headquarters in Jacksonville to report the attack. It had only been a matter of hours since the rape. Mrs. Treminio was distraught and in tears, and she asked to have her manager and a Crowley HR representative in the room for the meeting. In the meeting were Jose Lopez, a senior Crowley manager, and a female Crowley employee.

48. The first time Mrs. Treminio reported to Crowley that Mr. Blanco had sexually assaulted her in the elevator, Crowley HR had not taken her seriously, had used gaslighting tactics against her, and threatened to fire her if she did not remain silent about the attack. But Mrs. Treminio naively believed that this time, inside of Crowley's corporate headquarters in Jacksonville, Florida, she would be taken seriously and the company would be on her side. Sadly, she was wrong.

49. In the meeting, while struggling through tears and breaking down sobbing, Mrs. Treminio informed Jose Lopez and the female Crowley employee who was present that Juan Emilio Blanco had broken into her hotel room and raped her the previous evening. After listening to her story, Jose Lopez, who had been out drinking with Blanco the night of the rape, began to gaslight Mrs. Treminio by saying, "*Oh Vanessa, it's really not a big deal. You should thank Juan for noticing a woman like*

you. It's not like you were a virgin girl. You already have a kid, you know?" As Mrs. Treminio squirmed in shock, Lopez continued to ridicule her with unbelievable and offensive analogies, such as comparing Mrs. Treminio to a "used car," because she already had a child, and saying that it wasn't as if she was a "new car." Jose Lopez and the female Crowley HR manager both also told Mrs. Treminio that no one was ever going to believe her story.

50. Per Crowley's worldwide HR playbook, after thoroughly gaslighting her, the two senior Crowley employees then began directing threats and intimidation at Mrs. Treminio. Lopez warned Mrs. Treminio that she should "shut up" about being raped if she wanted to keep her job. Lopez threatened that if she ever told anyone else in the company about being raped, or if she talked about the attack publicly, she would be fired for spreading false rumors about a Crowley manager designed to damage the company's reputation.

X. Crowley and Jose Lopez Obstructed Mrs. Treminio in Reporting the Rape to Law Enforcement, Failed to Report the Rape to Law Enforcement, And Assisted Juan Emilio Blanco in Fleeing from the United States Following His Rape of Mrs. Treminio

51. Mrs. Treminio left Crowley headquarters in tears, completely distraught, and terrified. She was raped on Thursday night, she reported the rape in a meeting at Crowley headquarters in Jacksonville, Florida on Friday morning, and late on Friday afternoon Mrs. Treminio was scheduled to board United Airlines flight UA1979 for her flight back to El Salvador. Mrs. Treminio wanted to report the rape to the police,

but without the support of her employer, reporting the crime to law enforcement in Jacksonville seemed impossible and dangerous.

52. Mrs. Treminio was alone in a foreign country. She had already been threatened to stay silent about the attack inside Crowley's headquarters, she had no place to stay, knew no one who could help her, and did not have money to support herself in Jacksonville and did not have the money to buy her own return ticket to El Salvador. So, on the afternoon of Friday November 10, 2017, less than 24 hours after being violently raped by Juan Emilio Blanco, Mrs. Treminio was forced to board her return flight to El Salvador.

53. With the help of Jose Lopez and Crowley, Juan Emilio Blanco also departed on a flight from Jacksonville on the afternoon of Friday November 10, 2017 and returned to El Salvador. Crowley never reported the rape to law enforcement.

XI. Less Than 72 Hours After Being Raped, Crowley Forced Mrs. Treminio to Fly to Puerto Rico on Another Business Trip

54. On Monday November 13, 2017, less than 72 hours after she was raped on a Crowley business trip by her supervisor, Crowley again forced Mrs. Treminio into an international business trip. This time she was required to fly to Crowley's offices in Puerto Rico to assist with Crowley's disaster recovery efforts following the devastation caused by hurricanes Maria and Irma in September 2017. Crowley had been awarded contracts for the relief effort by the U.S. Federal Emergency

Management Agency in excess of \$100 million, and Mrs. Treminio was sent to help fulfill Crowley's contracts with the U.S. government.

55. Despite reporting the rape at Crowley headquarters in Jacksonville on the morning after the assault, Crowley never offered Mrs. Treminio any kind of medical assistance for her trauma. Instead, Crowley insisted that she keep her feelings bottled up inside and carry on working and traveling in the aftermath of a violent rape by a Crowley manager.

56. As she prepared to depart El Salvador, Mrs. Treminio's father drove her to the airport for her flight to Puerto Rico, less than 72 hours after being raped in Jacksonville. Mrs. Treminio will never forget that car ride. She cried all the way to the airport, but she could not bring herself to tell her father the true reason why she was crying. When they arrived at the airport, Mrs. Treminio was still crying as her father took her baggage out of the car. When her father embraced her in an innocent, tender hug, Mrs. Treminio was overcome with a feeling of disgust. It was a feeling of overwhelming disgust that she had never felt in her life.

57. Her father believed that she was crying because she was leaving her young son behind during her extended business trip. While hugging his daughter, her father candidly said, "*baby, please stop crying. Your son will be OK with us.*" Mrs. Treminio desperately wanted to tell her father the real reason she was crying, but when she tried to speak, she began to experience all of the physical sensations and

emotions associated with the original trauma. She was forced to hold the terrible truth of what happened in Jacksonville inside of herself, unable to tell even her own father.

XII. Mrs. Treminio Tells Her Supervisor in Puerto Rico About the Rape

58. In Puerto Rico, Mrs. Treminio began working to support Crowley's hurricane relief efforts for the U.S. government. Her boss was Ms. Ayesha Diaz, the General Manager. Mrs. Treminio and Ms. Diaz had previously worked together, and Ms. Diaz immediately knew that something was negatively affecting Mrs. Treminio.

59. Ms. Diaz told Mrs. Treminio that she had seen her frequently breaking down in tears, and she had noticed that Mrs. Treminio seemed very afraid of the male employees in the office, especially male managers. When asked what was wrong, Mrs. Treminio broke down crying and told Ayesha Diaz that she was raped by Juan Emilio Blanco in Jacksonville. She told Ms. Diaz about the rape, and also told her how she had been mocked, gaslit, silenced, and threatened inside Crowley's headquarters while reporting the rape.

60. Ms. Diaz told Mrs. Treminio that she was going to help her. At that point, Mrs. Treminio had completely lost trust in Crowley to do the right thing, and she told Ms. Diaz that she feared losing her job if she reported the rape again. But Ayesha Diaz believed Mrs. Treminio, and she insisted that she could help. Ms. Diaz advised Mrs. Treminio to report the rape and the treatment she had endured at Crowley

headquarters to Arthur LaMoureaux, Crowley's Vice President of Ethics and Compliance. Ayesha Diaz assured Mrs. Treminio that, unlike many other people within Crowley, Arthur LaMoureaux was a trustworthy person. But Mrs. Treminio was afraid of retaliation if she called LaMoureaux, and was non-committal.

XIII. Crowley Begins Two Separate Sexual Misconduct Investigations into Juan Emilio Blanco

61. Meanwhile, back in Crowley's toxic office in El Salvador that Mrs. Treminio had temporarily escaped, Juan Emilio Blanco continued his pattern of disgusting workplace misbehavior toward his employees on the Inland Department team. While Blanco was on his trip to Jacksonville where he raped Mrs. Treminio, numerous Inland Department team members decided they had endured enough of Blanco's workplace abuse.

62. Inland Department team members had begun gathering and organizing evidence against Juan Emilio Blanco by printing out the wildly inappropriate comments he made in group chats, in emails, and in other documents as proof of his behavior. Armed with this evidence, several of Blanco's team members filed a formal complaint against Juan Emilio Blanco with the Crowley corporate ethics department.

63. A team from Crowley headquarters in Jacksonville, Florida then flew to El Salvador to investigate the complaints that had been made by these team members against Juan Emilio Blanco. Everyone on the Inland Department team was

interviewed, and the investigators called Mrs. Treminio in Puerto Rico to ask her if she had anything to report regarding Mr. Blanco. Confused and afraid, on the phone call with the investigator Mrs. Treminio said that she had nothing to report. But the fact that an investigation into Blanco's sexual misconduct had begun gave Mrs. Treminio the confidence she needed to call Arthur LaMoureaux to report her rape.

64. The same day that she received a call from a Crowley ethics officer involved in the investigation of the Inland Department claims against Juan Emilio Blanco, and following the advice of Ayesha Diaz, Mrs. Treminio called Arthur LaMoureaux, Crowley's Vice President of Ethics and Compliance. Mrs. Treminio reported being raped by Juan Emilio Blanco, and also detailed how she had been treated by Jose Lopez and a female Crowley employee when she went to Crowley headquarters to report the rape.

65. On the call, Mr. LaMoureaux asked Mrs. Treminio for her permission to conduct an investigation. Mr. LaMoureaux specifically asked Mrs. Treminio if she would give him permission to go to the hotel in Jacksonville where she was raped to check the hotel's files, to interview employees, check the hotel's security cameras, and complete other necessary investigatory steps. Mrs. Treminio gave LaMoureaux her permission, and Crowley and LaMoureaux then began conducting an internal investigation into Mrs. Treminio's rape allegations.

XIV. Crowley's Internal Ethics Investigation Confirms Mrs. Treminio's Allegations of Rape Against Juan Blanco and Uncovers At Least 5 Additional Crowley Employees Who Had Been Sexually Assaulted By Blanco

66. About two weeks after she reported her rape and the aftermath to Arthur LaMoureaux, Mrs. Treminio was still in Puerto Rico when she received a call from LaMoureaux. First, LaMoureaux apologized for what had happened to her in Jacksonville. Then LaMoureaux told Mrs. Treminio that Crowley's investigation was able to prove that Mrs. Treminio was telling the truth about being raped by Juan Emilio Blanco. Accordingly, Crowley had decided to terminate the employment of Juan Emilio Blanco and two additional employees.

67. According to LaMoureaux, as a result of Crowley's ethics investigation, Crowley also fired Jose Lopez, who had intimidated Vanessa into silence inside the Crowley headquarters, compared Mrs. Treminio to a used car, told Mrs. Treminio that she should be grateful Juan Emilio Blanco had raped her, and then helped Mr. Blanco flee the United States in an effort to escape justice.

68. According to LaMoureaux, as a result of Crowley's ethics investigation, Crowley also fired HR Manager Jaqueline Najera because she had forced Mrs. Treminio to travel with Juan Emilio Blanco to Jacksonville despite Mrs. Treminio's protestations that she did not feel safe traveling with Blanco, and because Najera had been instrumental in covering up other instances of Blanco's sexual misconduct

towards Inland Department team members, including the sexual assault of Mrs. Treminio in the office elevator.

69. After apologizing to Mrs. Treminio and telling her the steps Crowley was taking as a result of the internal ethics investigation, Mr. LaMoureaux thanked Mrs. Treminio for having the courage to come forward. LaMoureaux then told Mrs. Treminio that as a result of her courageous action, Crowley was able to substantiate claims of sexual assault that had been made against Juan Blanco by 5 additional female Crowley employees.

XV. Arthur LaMoureaux Intimidates Mrs. Treminio Into Silence

70. LaMoureaux admonished Mrs. Treminio not to file a complaint with Crowley HR regarding her rape or the cover up, and he told her that his investigation would be the final word on the matter. He refused to provide Mrs. Treminio a copy of the investigation report, any paperwork relating to the investigation, or any proof of the action Crowley had taken as a result of the investigation. LaMoureaux told Mrs. Treminio that she was not entitled to any of those documents and that she had “no rights under the ethics investigation process.”

71. Before Mr. LaMoureaux ended his call with Mrs. Treminio, he had a final intimidating message. He told Mrs. Treminio that if her story ever became public, it could severely damage the company’s reputation and tarnish its relationship with the U.S. government, which was one of the company’s largest and most important

customers. In that call, Mr. LaMoureaux specifically mentioned Crowley's "Defense Freight Transportation Services (DFTS)" contracts, which were worth billions of dollars, and the emergency response contracts for hurricane relief in Puerto Rico.

72. Mr. LaMoureaux inelegantly explained that these contracts paid Mrs. Treminio's salary and the salaries of many other Crowley employees, and that a clean public image was very important to Crowley in maintaining those contracts and the relationships they were built on. The message to Mrs. Treminio was clear: keep quiet about the rape, or else. Mr. LaMoureaux's thinly-veiled threats of retaliation prevented Mrs. Treminio from talking about what happened to her for years. In fact, Mrs. Treminio was so afraid of retaliation from LaMoureaux and Crowley that she did not even tell her future husband about her rape until after they were married.

73. On the call, LaMoureaux offered Mrs. Treminio zero assistance or advice. Even though an internal investigation had substantiated her rape allegation and resulted in the firing of the rapist and two additional Crowley employees who were implicated in a cover up, no one from Crowley ever offered Mrs. Treminio any help to support her recovery from a heinous act of sexual violence that was completely preventable. Instead, she was threatened into silence about the rape and abandoned to deal with it on her own.

XVI. As a Result of Being Denied Treatment and Support By Crowley, Mrs. Treminio's Mental Health Begins to Deteriorate in the Wake of Being Raped by Juan Emilio Blanco

74. Over time, the sexual abuse trauma that Crowley forced Mrs. Treminio to internalize began to eat away at her soul and to destroy her mental health. The inevitable effects of sexual assault and rape trauma on victims are well-documented. In the aftermath of the multiple workplace sexual attacks that Mrs. Treminio suffered at Crowley, Mrs. Treminio experienced excruciatingly painful emotions, flashbacks, nightmares, depression, anxiety, and suicidal thoughts and attempts. She felt completely abandoned by Crowley in her healing process, and also remained afraid of retaliation from Crowley if she were to take steps to deal with the trauma or to speak to anyone about what happened to her in Jacksonville.

75. In 2020 Mrs. Treminio began to fall into a deep depression, but she did not understand why. She told herself that she had gotten married, graduated from university, and was continuing to have success in her career at Crowley, and yet she wondered why she was so unhappy.

76. After repressing any thoughts about the sexual assaults and rape she had endured for two years, Mrs. Treminio suddenly found herself unable to think about anything else. For more than an entire week she felt as if she were living in an on-and-off movie, constantly reliving the rape during the day, and having nightmares about the attack any time she was able to sleep.

XVII. Mrs. Treminio Attempts Suicide

77. Finally, in November of 2020, Mrs. Treminio felt that she could no longer endure the anguish and pain she was experiencing, and she decided to take her own life by crashing her car into a concrete wall. She left her house and began driving. As she drove, she prayed. In her prayers she asked God for only one thing: to ensure that she died immediately in the crash, rather than remain paralyzed in a wheelchair or in a coma.

78. As she was preparing to take her own life, Mrs. Treminio looked in the passenger's seat and saw her baby's little shoes and some of her son's toys. She thought about the fact that she had been a single mom when she was raped and began to wonder what would happen to her son after she died. She knew that her baby, which was the product of her recent marriage, would be taken care of by the father, but she wondered if her husband would also take care of her son after she was gone. *"What if my husband doesn't take care of him?"* she began asking herself.

79. Consumed with emotion, grief, and guilt, Mrs. Treminio began to pray again. This time she asked God for forgiveness. She decided not to kill herself, and she returned home. She stayed awake all night, and the next day she called "911" to Crowley's 24/7 psychological assistance number. Mrs. Treminio spoke with a Crowley "Health Advocate" and described the rape and the feelings and physical

symptoms she was struggling with. It was the first time since her rape that she had sought professional help.

80. The Health Advocate connected Mrs. Treminio with a therapist, and she began treatment immediately. Mrs. Treminio began taking 3-4 sessions per week with the psychologist who told her, *“It’s the rape that has you depressed. You never told anyone, and you never received the help that you needed, and that’s why you are so depressed. It’s like a wound that needed stitches, and instead of getting proper treatment, you applied a band-aid and moved on. Now the wound is infected, and the pus needs to come out, and you need treatment.”*

XVIII. In a State of Desperation Mrs. Treminio Contacts Senior Crowley Executive Arthur LaMoureaux and Asks Him for Help. Lamoreaux Refers Her to Claudia Moran

81. Soon after beginning treatment, and while still a Crowley employee, in December of 2020 Mrs. Treminio again contacted Arthur Lamoreaux, the senior Crowley executive who had conducted the rape investigation into Juan Blanco, confirmed the veracity of Mrs. Treminio’s claims, and subsequently threatened Mrs. Treminio into silence.

82. Mrs. Treminio told Arthur LaMoureaux that she had become very depressed as a result of being raped and she begged LaMoureaux to help her. In response, Arthur LaMoureaux directed Mrs. Treminio to contact Claudia Moran, a Crowley

HR Director, about the problems she was having. LaMoureaux reassured Mrs. Treminio that Claudia Moran would help her.

83. On December 16, 2020, Mrs. Treminio sent an email to Claudia Moran asking for help as Arthur Lamoreaux had instructed. In her email to Moran, Mrs. Treminio wrote: *“Good afternoon Claudia. I hope this email finds you in good health. I would like to express to you that due to the sexual abuse that I suffered from my former supervisor in 2017 (a member of Crowley Shared Services at that time) I have reached a breaking point where my emotional and psychological health are being compromised. I am currently receiving psychological and neurological help to be able to cope with the trauma and to understand why I can no longer control the trauma and the consequences that this situation left me in. The specialists who are treating me have given me medications to control depression, and anxiety (including controlled medications and not covered by PALIC) since I am in a very delicate emotional state that has been affecting me for a while. I’ve been down, frustrated, unmotivated, sad and it is affecting both my personal and work life. That is why I would like to request your intervention and to find out how the company can help me with the expenses that come over me both for medication and to continue my psychological treatment. I bring this up because I do not know how long or how much medication I will need in the process of treatment I am taking.*

84. Following her conversation with Arthur LaMoureaux and her email to Claudia Moran, Mrs. Treminio never received any response to her pleas for help. Despite this lack of assistance, Mrs. Treminio continued working hard and performing well in her job while continuing her treatment plan.

XIX. Crowley Cruelly Retaliates Against Mrs. Treminio For Seeking Treatment to Deal with Her Sexual Trauma And Terminates Her Employment

85. On January 13, 2021, less than a month after asking Arthur LaMoureaux for help, Erick Ramirez, Mrs. Treminio's supervisor, made a highly unusual visit to Mrs. Treminio's house around 8:00 PM. Because of the Covid-19 public health crisis, Mrs. Treminio and other Crowley employees had been working remotely from their homes. When Mrs. Treminio's supervisor arrived at her home, Mrs. Treminio asked him why he was there. Her supervisor replied that he was there to tell her that Crowley was going to fire Mrs. Treminio the next day. Mrs. Treminio asked him "why?," and her supervisor replied that the official reason would be for "*low performance.*"

86. Mrs. Treminio knew that low performance was a ridiculous reason for Crowley to fire her. Since beginning treatment she had been performing well, working harder than ever, and had never received any warnings from Crowley for low performance. When Mrs. Treminio stated these facts to her supervisor, he agreed with Mrs. Treminio and he acknowledged that low performance was merely a pretext

for her firing and that it was a farce. The real reason Crowley was firing her, he told her, was because the treating psychologist sent a report to Crowley explaining that Mrs. Treminio was experiencing a deep depression because she had not begun receiving mental health treatment after being raped by her supervisor on a business trip to Jacksonville, Florida.

87. The Crowley manager told Mrs. Treminio that after receiving the report from the psychologist, which included details about her rape in Jacksonville, HR Director Claudia Moran had begun investigating the matter, then escalated the matter to senior leaders at Crowley, including Arthur Lamoreaux, the man Mrs. Treminio had gone to for help. The Crowley manager told Mrs. Treminio that during the investigation, Crowley realized the company had never obtained any type of confidentiality agreement from Mrs. Treminio regarding the rape or the subsequent investigations into Juan Emilio Blanco, and upon receiving the psychologist's report Crowley executives became worried about the fact that Mrs. Treminio was talking about the rape and possibly the subsequent coverups.

88. The Crowley manager also told Mrs. Treminio at her home on the evening of January 13, 2021 that Crowley senior management had decided that Mrs. Treminio was at fault for her mental health crisis because she had waited too long to begin treatment. Crowley was essentially blaming Mrs. Treminio for getting raped by a man Crowley had known was a sexual predator.

89. At about 6:00AM the next morning, January 14, 2021, Mrs. Treminio received a very unusual call from Beatriz Ayala of Crowley HR, and Erick Ramirez, Mrs. Treminio's supervisor at Crowley. On the call, Beatriz and Erick told Mrs. Treminio to report to the office as soon as possible and to bring her Crowley-issued computer and other Crowley property and documents in her possession. When Mrs. Treminio arrived at Crowley, she was whisked into a small office where Beatriz Ayala and an attorney from an outside law firm were waiting for her. The outside counsel's name was Brian Duran.

XX. Crowley Attempts to Strongarm Mrs. Treminio Into Signing a Confidentiality Agreement and Refuses to Give Her the Final Paycheck She is Owed

90. In the small office, legal counsel Brian Duran first made it very clear to Mrs. Treminio that he was an attorney there to fire her, and Duran attempted to create an intimidating, claustrophobic climate in the small room. Duran and Beatriz Ayala told Mrs. Treminio she was being fired. They also told her they had prepared Mrs. Treminio's final paycheck, and added \$600 in addition to the amount she was owed in salary. Beatriz and Brian Duran then placed the check, a pen, and a settlement agreement in front of Mrs. Treminio and told her that she had to sign it.

91. In the settlement agreement, Crowley offered Mrs. Treminio the extra \$600 in exchange for giving up her rights to talk about the sexual harassment, sexual assaults, and rape that she had endured, and in exchange for giving up her right to

bring suit against Crowley. Mrs. Treminio refused to sign the agreement, and asked Brian Duran and Beatriz to give her the money the company owed her. Crowley refused to give Mrs. Treminio the money she was owed unless she also accepted the \$600 and signed the settlement agreement. Mrs. Treminio again refused to sign the confidentiality agreement and left the office.

92. In order to receive her last paycheck from Crowley, Mrs. Treminio was forced to obtain assistance from a governmental labor authority in El Salvador. After investigating the matter, this labor authority forced Crowley to pay Mrs. Treminio the salary she was owed and also fined Crowley for unfair labor practices.

XXI. Despite the Fact that Mrs. Treminio Spoke Fluent English and Worked Directly with Crowley Clients & Employees in the United States, Crowley Paid Mrs. Treminio a Fraction of What They Paid Employees at Crowley Headquarters

93. Crowley trusted Mrs. Treminio to interact with their most important customers, and frequently required Mrs. Treminio to perform work pursuant to contracts Crowley maintained with various agencies of the U.S. government, including work on extremely valuable contracts Crowley maintained with the U.S. Department of Defense. Yet Crowley exploited Mrs. Treminio by paying her a small fraction of what the company was paying employees in the United States to perform the same tasks. After 2.5 years of employment with Crowley, during which time Mrs. Treminio excelled at her job and received a promotion, Crowley was paying Mrs. Treminio less than \$1,000 per month in salary and less than \$10,000 per year.

By 2021 Mrs. Treminio had been a loyal Crowley employee for more than 9 years, had been used as a “diversity” prop in Crowley public relations campaigns, had received numerous promotions and a dramatic increase in responsibility, and yet was still being paid less than \$1,200 per month by Crowley and less than \$14,000 per year.

XXII. After Firing Mrs. Treminio Crowley Continues Their Campaign to Silence and Intimidate Her Through Baseless Legal Threats

94. If Crowley had simply listened to Mrs. Treminio when she reported the first sexual assault committed by Juan Emilio Blanco against her, or listened to Mrs. Treminio when she begged Crowley not to send her on the trip to Jacksonville with her sexual predator, or listened to the many other women within Crowley who had already reported Juan Emilio Blanco, Mrs. Treminio would never have been raped. She would never have been raped if Crowley had simply listened to her and acknowledged her value as a woman and as a human being.

95. Crowley obtained Mrs. Treminio’s medical record and used the information against her. Crowley fired her in retaliation for talking about the rape and left her without a job when she desperately needed the job to continue receiving psychological treatment and medication for severe depression and anxiety brought on by workplace sexual abuse. But Crowley did not stop there.

96. After Crowley fired her, Mrs. Treminio began speaking out against the sexual abuse she had endured at Crowley on her private social media accounts. Despite the

fact that Mrs. Treminio never signed a confidentiality agreement with Crowley regarding the sexual abuse she endured, Crowley's lawyers continued to hound, harass, and threaten her against speaking about the rape on social media. In response to her private social media posts, Crowley outside counsel Jennifer Mejía and William Canahuati of international law firm *Mayora & Mayora* sent Mrs. Treminio written legal threats warning her that she would face severe legal action from Crowley's lawyers if she continued to post about her rape on social media. These fraudulent and despicable legal tactics were designed to further traumatize and intimidate a rape victim who had already been traumatized by Crowley for years.

XXIII. Mrs. Treminio Pleads With Senior Crowley Executives to Help Bring Her Rapist To Justice But Receives No Response or Help

97. In an email sent to senior Crowley officers on June 11, 2021, Mrs. Treminio wrote of the sexual abuse and humiliation she lived through at Crowley. That email, which featured the subject line "*Sexual abuse crime suffered in Crowley Maritime Corporation,*" was sent to CEO Thomas Crowley, William Pennella, Jim Pennella, Arthur Lamoreaux, Claudia Kattan, Parker Harrison, Matthew Yacavone, Michael G. Roberts, Brett Bennet, Shiju Zacharia, and Tiffany King.

98. In that email to Thomas Crowley, Arthur Lamoreaux, Parker Harrison, and others, Mrs. Treminio wrote, "*My name is Vanessa Treminio and I was part of your company from 2012 to 2021, where I had the opportunity to assist in multiple projects including CROWLEY EMERGENCY RESPONSE in Puerto Rico,*

participation in the new CORE VALUES videos and member of the Diversity and Inclusion Council. In 2017 I was a victim of sexual abuse by my immediate boss on a business trip in Jacksonville, Fl. A fact that was reported to the authorities Jaqueline Najera - Manager of Human Resources El Salvador and Jose Lopez - Manager of Inland JAX who they threatened to take away my job if I discussed it with someone else since it was putting DFTS business in risk, it was also escalated to Arthur LaMoreaux in 2017, receiving confirmation from him that they had been able to verify the facts and that they were going to proceed with the immediate dismissal of Juan Blanco who was responsible for the incident, Jose Lopez and Jaqueline for cover-ups, after making my complaint with the authorities in Crowley ABSOLUTELY no one ever offered me any kind of help, they did not want to give me any document so I could proceed to sue Juan Blanco, nor did anyone within the company follow up on me case to see if I was in the process of overcoming the trauma...In December 2020 I went into a depression as a result of this violation and I go back to the authorities within Crowley seeking help (Arthur LaMoreaux) who asks me to contact Claudia Moran (Director of HR El Salvador) and it is Claudia, who notifies me that the company is not willing to help me, and less than a month after having escalated the situation to Claudia, I proceeded with my dismissal on January 14, 2021 for poor performance in which there was never a personnel action or follow-up by my leaders for poor performance and being one of my leaders who

confirmed that because I had escalated the situation of sexual abuse asking for help again I was no longer a trusted person and that Human Resources needed me to sign the settlement which exempted the company from any responsibility...I think that talking about my case can help many women who are victims of sexual abuse as an example that we should not be silent or feel ashamed or fear for something that we are not to blame...for a long time they threatened me, there was never the will to help me and when I most need the company they leave me without work to be able to continue my medication and psychological treatment, after 9 years of service I think that it is not fair the way they treated me, much less the retaliation that ended in my immediate dismissal for having asked help for a sexual abuse committed by someone within your company, on a business trip and that could have been avoided by the Crowley authorities paying attention to the complaints made against this person not only from me but from all team members who reported to him...I know I was only an employee for you, but I'm [also] a woman, mom, student, wife, sister, and overall I'm a human being. An animal [rights] group would have done more for a raped dog than your company did for me."

99. Mrs. Treminio's pleas to the people at the top of Crowley fell on deaf ears, and she received no response from anyone.

100. Following the rape and the subsequent threats made to her by Crowley, Mrs. Treminio felt disempowered and frozen. The trauma of what she endured at Crowley

shattered her life and her self-image. Mrs. Treminio still feels used, violated, and like a shell of the woman she once was.

FIRST CAUSE OF ACTION

(Sex Trafficking under 18 U.S.C. § 1591, et seq.)

Against JUAN EMILIO BLANCO

101. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

102. In violation of 18 U.S.C. § 1591, Juan Emilio Blanco knowingly, in or affecting interstate or foreign commerce, did recruit, entice, solicit, or transport Plaintiff knowing that means of force, threats of force, fraud, or coercion (or any combination thereof) would be used to cause Plaintiff to engage in any sex act on account of which anything of value would be given to or received by any person.

103. The statute of limitations for violations of the sex trafficking statute is 10 years. 18 U.S.C. § 1595. The Plaintiff was affected within the 10 years prior to filing suit.

104. Juan Emilio Blanco's actions knowingly affected interstate or foreign commerce when he, while serving as Plaintiff's supervisor, transported Plaintiff from San Salvador, El Salvador to Jacksonville, Florida on an official Crowley business trip while knowing that he planned to sexually attack Plaintiff in the United States.

105. Juan Emilio Blanco personally recruited Plaintiff to be one of his Crowley Inland Department subordinate team members required to travel with him from San Salvador, El Salvador to Jacksonville, Florida on the Crowley business trip.

106. When Blanco recruited Plaintiff to accompany him on the trip, he did so knowing that he would use force, threats of force, fraud, coercion, or a combination thereof (as he had done many times before with Crowley employees, including with Plaintiff), to sexually attack Plaintiff in the United States.

107. Juan Emilio Blanco knowingly coerced Plaintiff into his sex trafficking venture when he conspired with Crowley HR Manager Jaqueline Najera, senior manager Jose Lopez, and other Crowley agents and employees in the United States to use coercion and threats of serious harm to force Mrs. Treminio to travel from San Salvador, El Salvador to Jacksonville, Florida for a business trip, despite Mrs. Treminio's strong protestations that she did not feel safe traveling with Blanco.

108. When Plaintiff strenuously objected to the order to travel with Juan Emilio Blanco to Jacksonville, Blanco conspired with Jaqueline Najera and other Crowley employees in the United States to cause Plaintiff to reasonably believe that her failure to travel to Jacksonville with Blanco would result in serious harm to herself and to her child. As part of that plan, Plaintiff was told by Blanco and Najera that, if she did not travel to Jacksonville with Blanco, her employment with Crowley would be terminated.

109. Blanco also threatened Plaintiff that if she quit or were fired over her refusal to travel overseas with Blanco, he would make it impossible for Plaintiff to obtain another job by providing false, retaliatory, and defamatory information, including extremely negative feedback about Plaintiff's character and job performance, to any potential employers who contacted Blanco or Crowley in the course of performing employment history or reference checks on Plaintiff.

110. The use by Blanco of coercion, threats of loss of employment, and threats to destroy Plaintiff's reputation in the course of preventing her from gaining future employment caused Plaintiff to reasonably believe that her failure to participate in the venture would result in serious harm to herself and to her young child. As Plaintiff was a young, single mother in a developing country where equivalent office jobs were extremely difficult to obtain, Plaintiff reasonably feared that she would suffer serious professional and reputational harm as well as serious, potentially ruinous financial harm if she did not comply with the order to travel to Jacksonville with Blanco.

111. In exchange for agreeing to participate in what Blanco knew was a sex trafficking venture in which he would use force, threats of force, coercion, or any combination of such means, to cause Plaintiff to engage in a commercial sex act, Plaintiff benefitted financially and received things of great value to her. In exchange for agreeing to participate, Plaintiff received tangible job benefits. She was allowed

to continue her employment with Crowley and to continue receiving her salary and other employment benefits. Inherent in this twisted forced-bargain was the possibility of valuable career advancement within Crowley. This career advancement in fact materialized in the years following Plaintiff's rape in Jacksonville, and would not have materialized had Plaintiff not complied with the order to accompany a known sexual predator on an international business trip.

112. In Jacksonville, Juan Emilio Blanco used fraud when, on the evening of Thursday November 9, 2017, he lied to front desk employees at the "Courtyard by Marriott Jacksonville I-295/East Beltway," hotel and fraudulently claimed that he was staying in Plaintiff's room in order to obtain an access key card, which he then used to unlawfully gain entry to her room and violently rape her.

113. Before and during Juan Emilio Blanco's brutal sexual assault of Plaintiff in Jacksonville, Blanco used physical force to restrain Plaintiff in order to brutally rape her. Blanco used the weight of his body and brute force to pin Plaintiff to the bed, thus preventing her from escaping from him during the sexual attack. Blanco used brute force to cover Plaintiff's mouth with his hand, thus preventing Plaintiff from crying out for help as he forcefully and repeatedly raped her.

WHEREFORE, by virtue of these violations of 18 U.S.C. §§ 1591, 1595, Plaintiff respectfully requests this Court to enter judgment against Defendant Juan Emilio Blanco for compensatory damages, consequential damages, and punitive

damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

SECOND CAUSE OF ACTION

(Sex Trafficking under 18 U.S.C. § 1591, et seq.)
Against CROWLEY MARITIME CORPORATION

114. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

Venture Liability

115. In violation of 18 U.S.C. § 1591, Crowley Maritime Corporation (“Crowley”) did knowingly benefit, financially or by receiving anything of value, from participation in a venture of two or more individuals associated in fact, in or affecting interstate or foreign commerce, in which Plaintiff was recruited, enticed, harbored, transported, or obtained by any means, when Crowley knew, or was in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause the Plaintiff to engage in a commercial sex act.

116. The statute of limitations for violations of the sex trafficking statute is 10 years. 18 U.S.C. § 1595. The Plaintiff was affected within the 10 years prior to filing suit.

117. Crowley knew the sex trafficking venture that used force, threats of force, fraud, coercion, or any combination of such means, to cause Plaintiff to engage in a commercial sex act affected interstate or foreign commerce when Crowley knowingly recruited, enticed, or obtained Plaintiff and then transported Plaintiff from San Salvador, El Salvador to Jacksonville, Florida for an official Crowley business trip with Crowley employee Juan Emilio Blanco, who Crowley knew was a sexual predator who had already sexually abused Plaintiff and other women within the Crowley offices.

118. When multiple Crowley agents and employees recruited, enticed, or obtained Plaintiff and then transported Plaintiff from El Salvador to the United States with Juan Emilio Blanco, Crowley knew, or was in reckless disregard of the fact, that Juan Emilio Blanco would use force, threats of force, fraud, coercion, or any combination of such means, to sexually attack Plaintiff on the business trip. Multiple female Crowley employees had already notified Crowley that Juan Emilio Blanco had taken advantage of his position of power within Crowley to sexually harass and sexually assault women in the Crowley offices and possibly on prior Crowley business trips. Based on these reports, Crowley knew, or was in reckless disregard of the fact, that Juan Emilio Blanco was a sexual predator who had sexually attacked female Crowley employees, and was a person who had a strong and demonstrated propensity to sexually attack women.

119. When multiple Crowley agents and employees recruited, enticed, or obtained Plaintiff and then transported Plaintiff from El Salvador to the United States with Juan Emilio Blanco, Crowley knew, or was in reckless disregard of the fact, that Juan Emilio Blanco would use force or threats of force to sexually attack Plaintiff on the business trip, because Plaintiff had already reported to Crowley that Juan Emilio Blanco had sexually assaulted her in the elevator at the Crowley offices.

120. When multiple Crowley agents and employees recruited, enticed, or obtained Plaintiff and then transported Plaintiff from El Salvador to the United States with Juan Emilio Blanco, Crowley knew, or was in reckless disregard of the fact, that Juan Emilio Blanco would use force or threats of force to sexually attack Plaintiff on the business trip, because Plaintiff begged Crowley not to send her on the trip with Juan Emilio Blanco, explicitly told Crowley that she did not feel safe traveling with Blanco, and told Crowley that she was afraid for her own safety around Blanco because he had already sexually assaulted her in the elevator at the Crowley offices.

121. Crowley knew, or was in reckless disregard of the fact, that multiple Crowley agents and employees, including Juan Emilio Blanco, Jaqueline Najera, Jose Lopez, Vice President Bob Weist, Senior Vice President Steve Collar, and other Crowley employees and agents in the United States had used a plan of coercion and threats of serious harm to force Plaintiff to accompany Juan Emilio Blanco on the business trip to Jacksonville.

122. When Plaintiff strenuously objected to complying with Crowley's order to travel alone to a foreign country with Juan Emilio Blanco over her grave concerns that Juan Emilio Blanco would once again sexually attack her, Crowley's agents and employees threatened and coerced Plaintiff into making the trip by telling Plaintiff that if she did not travel to Jacksonville with Blanco, her employment with Crowley would be terminated.

123. In the course of threatening and coercing Plaintiff, Crowley's agents and employees did not stop at threatening Plaintiff with the termination of her employment. Multiple Crowley agents and employees also threatened Plaintiff that if she quit or were fired over her refusal to travel overseas with the man who had already sexually abused her, Crowley would make it impossible for Plaintiff to obtain another job by providing false, retaliatory, and defamatory information, including extremely negative feedback about Plaintiff's character and job performance, to potential employers who contacted Crowley in the course of performing employment history or reference checks on Plaintiff.

124. The use by Crowley and its agents and employees of coercion, threats of loss of employment, and threats to destroy Plaintiff's reputation in the course of preventing her from gaining future employment caused Plaintiff to reasonably believe that her failure to participate in the venture would result in serious harm to herself and to her young child. As Plaintiff was a young, single mother in a

developing country where equivalent office jobs were extremely difficult to obtain, Plaintiff reasonably feared that she would suffer serious professional and reputational harm as well as serious, potentially ruinous financial harm if she did not comply with the order to travel to Jacksonville with Blanco.

125. The threats and coercion directed at Plaintiff by Crowley led Plaintiff to reasonably fear for the safety and security of herself and her child if she did not comply with the order to travel to Jacksonville with a man she feared would sexually attack her during the trip.

126. In exchange for participating in what Crowley knew, or was in reckless disregard of the fact, was a sex trafficking venture in which force, threats of force, or coercion would be used to cause Plaintiff to engage in a commercial sex act, Plaintiff benefitted financially and received things of great value to her. In exchange for her participation, Plaintiff received tangible job benefits. She was allowed to continue her employment with Crowley and to continue receiving her salary and other employment benefits. Inherent in this twisted forced-bargain was the possibility of valuable career advancement within Crowley. This career advancement in fact materialized in the years following Plaintiff's rape in Jacksonville, and would not have materialized had Plaintiff not complied with Crowley's order to accompany a known sexual predator on an international business trip.

127. Multiple Crowley agents and employees maliciously, vindictively, and coercively threatened to destroy valuable intangible career assets of Plaintiff if she did not follow Crowley's orders to participate in the venture. By participating in what Crowley knew, or was in reckless disregard of the fact, was a sex trafficking venture, Plaintiff received the additional value of preserving her professional reputation, future employment opportunities, and future earning potential.

128. The sex trafficking venture that caused Plaintiff to engage in a commercial sex act involved numerous Crowley employees across multiple countries, including senior employees within Crowley corporate headquarters in Jacksonville.

129. Crowley and its employees and agents covered up Blanco's sexual misconduct and sex crimes for years and continued to employ Blanco despite overwhelming evidence and knowledge that he was a sexual predator who systematically preyed on vulnerable female Crowley employees. Crowley continued to employ this sexual predator and continued to cover up his sex crimes because Blanco was a star performer for Crowley, a man who drove profits for Crowley, and a favorite employee of senior managers in the United States. Juan Emilio Blanco helped Crowley earn profits, and profits are what mattered most to Crowley. Crowley knowingly benefitted financially by employing Blanco and keeping him happy, despite knowledge of the sex crimes he had committed against Crowley employees, and despite Crowley's knowledge of Blanco's long history of abusing

his position and power within Crowley to engage in an outrageous and unlawful pattern of sexual misconduct.

Principal Liability

130. In violation of 18 U.S.C. § 1591, Crowley Maritime Corporation (“Crowley”) knowingly, in or affecting interstate or foreign commerce, did recruit, entice, transport, solicit, or obtain Plaintiff knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, or coercion (or any combination thereof) would be used to cause Plaintiff to engage in any sex act on account of which anything of value would be given to or received by any person.

131. The statute of limitations for violations of the sex trafficking statute is 10 years. 18 U.S.C. § 1595. The Plaintiff was affected within the 10 years prior to filing suit.

132. The two theories of liability available to trafficking victims under Section 1595(a) are not mutually exclusive.

133. The sex trafficking venture that caused Plaintiff to engage in a commercial sex act involved numerous Crowley employees across multiple countries, including senior employees within Crowley corporate headquarters in Jacksonville, Florida.

134. Multiple Crowley employees who participated in and facilitated the sex trafficking venture were agents and employees of Crowley acting within the actual or apparent scope of their employment or authority, and two or more of these agents

intended, at least in part, to in some way benefit Crowley through their participation in the venture, which Crowley knew, or was in reckless disregard of the fact, would use means of force, threats of force, fraud, coercion, or any combination of such means to cause Plaintiff to engage in a commercial sex act.

135. Crowley employees involved in the sex trafficking venture included senior Crowley employees in El Salvador and the United States who were involved in covering up the sexual misconduct and sex crimes committed by Juan Emilio Blanco against at least five different women while Blanco served as a senior manager in Crowley's Procurement Department. Instead of firing Blanco and reporting Blanco to law enforcement for his outrageous and illegal pattern of sexual predation that was known to Crowley, these senior Crowley employees transferred Blanco to the Inland Department and made him Plaintiff's supervisor.

136. Crowley agents and employees involved in the sex trafficking venture included Jaqueline Najera, who knew that Juan Emilio Blanco was a sexual predator who had been transferred to the Inland Department because of sexual misconduct, and who knew that Juan Emilio Blanco had brutally sexually assaulted Plaintiff in the elevator inside the Crowley offices. When Plaintiff reported being sexually assaulted by Blanco in the Crowley elevator, Najera gaslit Plaintiff, threatened her, silenced her, informed Blanco of the sexual assault allegations, and covered up yet another one of Blanco's sex crimes. When Plaintiff pleaded with Jaqueline Najera

that she did not feel safe traveling with Juan Emilio Blanco, Najera used coercion and threats of serious harm to cause Plaintiff to believe that her failure to accompany a known sexual predator on an international business trip would result in serious harm to Plaintiff and her child. In covering up numerous instances of Blanco's sexual misconduct, threatening Plaintiff into silence, and forcing Plaintiff to travel internationally with Blanco, Najera acted within the actual or apparent scope of her employment or authority, and she intended, at least in part, to in some way benefit Crowley. Najera knew that Blanco was a "star" performer and that Crowley valued Blanco much more highly than the company valued Plaintiff. Najera knew that it was her job to keep Blanco happy and to make sexual misconduct allegations against Blanco disappear in order to protect the reputation of Crowley and to protect the profits that Crowley earned by continuing to employ Blanco.

137. Crowley agents and employees involved in the sex trafficking venture included Jose Lopez, a senior manager at Crowley headquarters in Jacksonville, Florida. As Blanco's direct supervisor, Lopez knew that Blanco was a sexual predator who had been transferred to the Inland Department because numerous sexual misconduct complaints had been made against him. The morning after Blanco broke into Plaintiff's hotel room and brutally raped her, Jose Lopez continued his long pattern of covering up Blanco's sex crimes against Crowley's vulnerable female employees in order to, at least in part, financially benefit Crowley. After

Plaintiff arrived at Crowley corporate headquarters, in tears and distraught, to report her rape, Plaintiff found herself in a meeting with Jose Lopez and a female Crowley employee. Instead of helping Plaintiff, Lopez ridiculed Plaintiff, told her she should be grateful Blanco had raped her, told Plaintiff that he didn't believe her and that no one else would ever believe her story, then threatened Plaintiff into silence by telling her that if she again told anyone about being raped by Blanco, she would be fired. Lopez's actions were designed to benefit Crowley by protecting the company from reputational damage and to shield the company from financial liability for the actions of Blanco and other Crowley employees involved in the sex trafficking venture. Blanco's actions were also designed to benefit Crowley by protecting a star employee who drove profits for Crowley and who was a favorite of senior Crowley managers.

138. Other Crowley employees within Crowley's headquarters in Jacksonville were involved in covering up Juan Emilio Blanco's rape of Plaintiff. A young female employee from El Salvador walked into Crowley headquarters in Florida, distraught and in tears, complaining that her boss had raped her the night before and demanding to report the rape to Crowley. It is inconceivable that knowledge of this event remained confined to Jose Lopez and one other Crowley employee. News of Plaintiff's ordeal and rape allegations likely reached the highest levels of Crowley leadership within a matter of hours. And yet these Crowley leaders were not only

complicit in covering-up a felony sex crime, but they helped Juan Emilio Blanco flee the United States later that same day by assisting in transporting Blanco to the Jacksonville International Airport, paying for Blanco's flight back to El Salvador, and intentionally failing to notify law enforcement of the violent sex crime Plaintiff had reported to Crowley.

139. Crowley is liable as a Principal for the tortious and criminal misdeeds of its employees and agents involving trafficking Plaintiff and causing her to engage in a commercial sex act, because multiple Crowley agents and employees acted within the actual or apparent scope of their employment or authority and these agents intended, at least in part, to some way benefit Crowley Maritime Corporation through their actions. Crowley is liable as a Principal for the tortious and criminal misdeeds of its employees and agents involving trafficking Plaintiff and causing her to engage in a commercial sex act even though the actions of those agents and employees may have been contrary to Crowley's written corporate policies through the doctrine of *respondeat superior*.

WHEREFORE, by virtue of these violations of 18 U.S.C. §§ 1591, 1595, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley Maritime Corporation for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest,

costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

THIRD CAUSE OF ACTION
(Sexual Battery)
Against JUAN EMILIO BLANCO

140. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

141. Juan Emilio Blanco entered Plaintiff's hotel room in Jacksonville, Florida and engaged in intentional, nonconsensual sexual intercourse with Plaintiff.

142. Juan Emilio Blanco's tortious conduct was harmful and offensive and caused Plaintiff injury, damage, loss, and harm.

143. Under Florida law, an action for assault, battery, false arrest, malicious prosecution, malicious interference, false imprisonment, or any other intentional tort must be commenced within 4 years. Fla. Stat. § 95.11.

144. Florida law provides that the applicable 4 year statute of limitations is tolled by the absence from the state of the person to be sued. Fla. Stat. § 95.051.

145. After raping Plaintiff at a hotel in Jacksonville, Florida on November 9, 2017, Juan Emilio Blanco fled the State of Florida and the United States and flew to the country of El Salvador on November 10, 2017. Defendant Crowley Maritime Corporation assisted Juan Emilio Blanco in his flight from the state and from justice.

146. Upon information and belief, Juan Emilio Blanco has remained in the country of El Salvador since November 10, 2017. Therefore, the statute of limitations for civil claims against Juan Emilio Blanco arising out of his violent rape of Plaintiff have been tolled since November 10, 2017.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Juan Emilio Blanco for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

FOURTH CAUSE OF ACTION

(False Imprisonment.)

Against Juan Emilio Blanco

147. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

148. Without privilege or authority, Juan Emilio Blanco intentionally and physically restrained and confined Plaintiff by use of his hands, arms and other body parts for the purpose of, and with the knowledge that his actions would result in, Plaintiff being confined and restrained in her hotel room in Jacksonville, Florida.

149. Juan Emilio Blanco acted with the intent to restrain and deprive Plaintiff of her liberty, against Plaintiff's will and despite her protests, screams, and physical resistance.

150. Throughout Defendant's restraint and confinement of her person, Plaintiff had no reasonable means or avenue of escape.

151. Plaintiff in no way consented to being so restrained or confined by Defendant.

152. Defendant's acts of restraining and confining Plaintiff were wholly without authority and completely unreasonable in light of the foregoing facts and circumstances.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Juan Emilio Blanco for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

FIFTH CAUSE OF ACTION

(Forced Labor under 18 U.S.C. § 1589, et seq.)

Against CROWLEY MARITIME CORPORATION

153. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

154. 18 U.S.C. § 1595 provides for a civil action against the "perpetrator (or whoever knowingly benefits, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of this chapter)" *i.e.*, for violations of 18 U.S.C. Chapter 77 –

“PEONAGE, SLAVERY, AND TRAFFICKING IN PERSONS”—18 U.S.C. §§ 1581 through 1597.

155. Crowley violated 18 U.S.C. § 1589(a) by knowingly obtaining and providing the labor and services of Plaintiff by, among other things, threats of force, threats of serious harm to Plaintiff and to Plaintiff’s child, and threats of serious financial, psychological, and/or reputational harm that were sufficiently serious to compel a reasonable person of the same background and in the same circumstances as the Plaintiff to perform or continue performing labor or services in order to avoid incurring that harm.

156. Crowley operated a scheme, plan or pattern intended to cause Plaintiff to believe that non-performance of such labor or services would result in serious financial, psychological and/or reputational harm in order to exert pressure on Plaintiff to go on the Crowley business trip with the sexual assaulter, Juan Emilio Blanco.

157. The statute of limitations for violations of the forced labor statute is 10 years. 15 U.S.C. § 1595. The Plaintiff was affected within the 10 years prior to filing suit.

158. After Crowley manager Juan Emilio Blanco sexually assaulted Plaintiff in the elevator of the Crowley’s offices in October 2017, Plaintiff notified Crowley that she did not want to perform the labor of accompanying Juan Emilio Blanco on the official Crowley business trip to Jacksonville, Florida. Plaintiff told Crowley she did

not feel safe traveling with Blanco because she was afraid Blanco would sexually assault her again on the business trip.

159. Plaintiff pleaded with Crowley not to force her to perform the labor or services of a week-long business trip to Jacksonville with her abuser. Plaintiff was reasonably apprehensive that performing such labor or services would place her in grave danger.

160. Crowley knew Plaintiff did not want to perform the labor or services of a business trip to Jacksonville with Blanco, and Crowley knew Plaintiff feared she would face serious harm on the business trip at the hands of Juan Emilio Blanco.

161. Crowley used threats of serious harm to Plaintiff in order to obtain the labor or services of Plaintiff when Crowley HR manager Jaqueline Najera said to Plaintiff, after plaintiff reported to Najera that Blanco had sexually assaulted her and after Plaintiff told Najera she did not feel safe traveling with Blanco, *“Vanessa, you need to remember that you are a single mom, and you need to think about your son. Do you want him to know mommy for her successful career, or for getting fired for talking about a sexual situation that cannot be proven?”*

162. Crowley used threats of serious harm to Plaintiff in order to obtain the labor or services of Plaintiff when Crowley HR manager Jaqueline Najera said to Plaintiff, after Plaintiff reported to Najera that Blanco had sexually assaulted her and after Plaintiff pleaded with Najera not to force her to accompany Blanco on the trip to

Jacksonville, that Plaintiff's only choices were to go on the trip with Blanco or be fired from her job.

163. Crowley used threats of serious harm to Plaintiff when Crowley manager Juan Emilio Blanco told Plaintiff, following Plaintiff's report of sexual assault to Jaqueline Najera and Plaintiff's initial plea not to be sent on the trip to Jacksonville with Blanco, "*Vanessa, what did you gain by getting HR involved? Remember, Vanessa, you're a single mom. When your kid goes hungry, remember that. You better cooperate, or you will get fired in a snap.*"

164. Crowley used a combination of threats of force and threats of serious harm to Plaintiff when Crowley manager Juan Emilio Blanco told Plaintiff, immediately following Plaintiff's report of sexual assault to Jaqueline Najera and Plaintiff's initial plea not to be sent on the trip to Jacksonville with Blanco, that Blanco was not someone Plaintiff wanted for an "*enemy.*"

165. Crowley used a combination of threats of force and threats of serious harm to Plaintiff when Najera and Blanco warned Plaintiff not to talk to anyone about her sexual assault.

166. Crowley had actual and constructive knowledge that Plaintiff's supervisor, Juan Emilio Blanco, was threatening and sexually assaulting the Plaintiff, therefore Crowley intended to participate in a forced labor scheme.

167. Crowley's threats of loss of employment caused Plaintiff to reasonably believe that her failure to perform the labor or services of traveling to Jacksonville with her abuser would result in serious harm to herself and to her child. Since Plaintiff was a young, single mother in a developing country where equivalent office jobs were extremely difficult to obtain, Plaintiff reasonably feared that she would suffer serious professional and reputational harm as well as serious, potentially ruinous financial harm if she did not comply with the order to travel to Jacksonville with Blanco.

168. Crowley kept the Plaintiff in her position by fear, intimidation, and psychological coercion.

169. Crowley also violated 18 U.S.C. § 1590 – Trafficking – by knowingly recruiting, harboring, transporting, providing, or obtaining the Plaintiff for labor or services. Such violation included Plaintiff's aggravated sexual abuse.

WHEREFORE, by virtue of these violations of 18 U.S.C. §§ 1589, 1590, 1595, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley for compensatory damages, consequential damages, reasonable attorneys' fees, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

SIXTH CAUSE OF ACTION

(Negligence for sexual misconduct, assault, and violence in the workplace)
Against CROWLEY MARITIME CORPORATION

170. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

171. At all material times, Plaintiff was employed by Crowley, was an invitee of Crowley, and Crowley owed her the enhanced duties owed invitees.

172. At all material times, Crowley also owed her duties of care as her employer, including the duty to provide a safe and secure workplace for her workplace activities (such as those she undertook in the furtherance of Crowley's business purposes); a duty to protect employees from people with a known dangerous propensity; the duty to train and retain managers who exercise their supervisory and other powers in a reasonable manner; the duty to design, implement, and maintain effective training, reporting, recordkeeping, and disciplinary processes to identify, prevent, discourage, report, eliminate, and remediate sexual misconduct, assault, and violence in the workplace for all Crowley employees; and the duty to design, implement, and maintain functional systems of oversight of its supervisors who wielded authority over subordinates like Plaintiff.

173. Crowley breached the duties owed to Plaintiff for the following reasons:

- a. at the time of Plaintiff's employment, Crowley had actual and constructive knowledge of Defendant Juan Emilio Blanco's

predisposition to harass and assault female subordinates and abuse his supervisory capacity over female employees, and took no steps to curtail, regulate, remove, or otherwise supervise Blanco's authority over Crowley subordinates;

- b. Crowley failed to ensure that its working environment was safe and secure for its employees and invitees, including via insufficient security protocols such as the quantity and placement of surveillance cameras;
- c. Crowley failed to design, implement, and maintain effective training, reporting, recordkeeping, and disciplinary processes to identify, prevent, discourage, report, eliminate, and remediate sexual misconduct, assault, and violence in the workplace, including after receiving actual and constructive notice that Blanco was abusing his powers to harass and sexually assault subordinates; and
- d. Crowley failed to warn Plaintiff of Blanco's dangerous propensity toward harassment and sexually abusive behavior, and instead knowingly forced her to travel on an overnight business trip with Blanco, during which she was forcibly raped.

174. Crowley recruited the Plaintiff, told the Plaintiff to rely on the company, and then engaged in psychological abuse and coercion, threatening to destroy her career if she filed a complaint for sexual assault in the workplace.

175. As a result, Plaintiff was shaken, confused, terrified, and intimidated for years.

176. Crowley, through its actual or apparent agents, representatives, servants, and/or employees:

- a. intimidated, threatened, and gaslit the Plaintiff;
- b. threatened the Plaintiff that she did not want Juan Emilio Blanco as an enemy;
- c. threatened the Plaintiff to “*cooperate, or you will get fired in a snap;*”
- d. threatened the Plaintiff that it would be her word against that of her sexual assaulter;
- e. warned the Plaintiff that she needed to be careful about reporting sexual assault in the workplace because no one would believe her;
- f. threatened the Plaintiff that no one would believe her because of her “*Latin culture;*”
- g. threatened the Plaintiff that the higher ups at Crowley will think that the Plaintiff provoked the sexual assault;
- h. warned the Plaintiff not to report Juan Emilio Blanco because he was a star employee that Crowley loved;
- i. warned the Plaintiff not to report the sexual assault because she was a single mom who needed to think about supporting her son rather than risk getting fired;

- j. threatened that Plaintiff's child would "*go hungry*;"
- k. threatened to ruin Plaintiff's reputation; and
- l. actively covered up the known history of sexual assault at Crowley.

177. It took Plaintiff years to understand the scope of her physical, emotional, and psychological torment caused by her sexual assault in the workplace.

178. The lasting effects are still felt by Plaintiff to this day, as she deals with post-traumatic stress disorder, anxiety, depression, and panic attacks.

179. Crowley's knowledge and conduct created and broadened a foreseeable zone of risk posing a general threat of harm to Plaintiff and other employees at Crowley's workplace, which created a duty of care toward Mrs. Treminio, an employee and invitee of Crowley who was within this foreseeable zone of risk. Crowley breached this duty of care.

180. All or some of the above acts and/or omissions caused and/or contributed to the Plaintiff being raped by Crowley employee Juan Emilio Blanco.

181. Defendant knew of the foregoing dangerous condition in the workplace and did not correct it, and the condition existed for a sufficient length of time so that Crowley, in the exercise of reasonable care under the circumstances, should have learned of and corrected it.

182. Crowley's breach of the duty of care was the direct and proximate cause of the Plaintiff's physical and emotional injuries. Moreover, these breaches were so

reckless as to constitute a conscious disregard and indifference to the human rights, safety, and privacy of Mrs. Treminio.

183. As a result of Crowley's negligence, Plaintiff was raped in the workplace. She suffered and continues to suffer physical pain, mental anguish, loss of enjoyment of life, and incurred psychiatric expenses. The injuries are permanent or continuing in nature, and Plaintiff will suffer the losses and impairments in the future.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

SEVENTH CAUSE OF ACTION
(Negligent Supervision and Retention)
Against CROWLEY MARITIME CORPORATION

184. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

185. At all material times, Blanco was under the direction, supervision, and control of Crowley as an employee of Crowley.

186. Crowley had a continuing duty to use reasonable care in defining the scope of Blanco's duties and powers and to reasonably protect employees such as Mrs. Treminio working under Blanco's supervision.

187. At all material times, Crowley had no effective training, oversight, or reporting protocols in place to protect its employees from workplace sexual misconduct, assault, and violence. Moreover, Crowley's remedial protocols to respond to acts of sexual misconduct in the workplace were ineffective or nonexistent during Mrs. Treminio's tenure at Crowley.

188. Crowley had actual knowledge and constructive knowledge that Blanco had previously engaged in sexual misconduct, assault, and violence in the workplace, but did not remove Blanco, reduce his powers, or implement effective policies or procedures to prevent further misconduct by Blanco.

189. Crowley knew or should have known that Blanco was dangerous and likely to commit further sexual misconduct, assault, and violence in the workplace.

190. Once Crowley became aware of Blanco's overtly dangerous, inappropriate, and offensive behavior in the workplace, Crowley failed to take appropriate corrective action through retraining, reassignment or discharge of Blanco as an employee.

191. Crowley tolerated sexual misconduct, assault, and violence in the workplace and continued to retain Blanco as an employee after Crowley became aware of his dangerous propensities.

192. Blanco's acts of sexual misconduct, assault, and violence toward Mrs. Treminio in the workplace were foreseeable, and preventable.

193. Crowley's negligent supervision and retention of Blanco in the workplace despite prior knowledge and warnings about sexual misconduct, assault, and violence in the workplace were the direct and proximate causes of the physical and emotional harms suffered by Plaintiff. If Crowley had implemented reasonable and appropriate oversight, reporting, and training procedures after learning of prior sexual misconduct, assault, and violence by Blanco in the workplace, toward one or more subordinates at Crowley, his sexual assault, battery, and rape of Mrs. Treminio would never have occurred. Crowley's breach was so reckless as to constitute a conscious disregard and indifference to the human rights, safety, and privacy of Mrs. Treminio and other Crowley employees and invitees.

194. Crowley recruited the Plaintiff, told the Plaintiff to rely on the company, and then engaged in psychological abuse and coercion, threatening to destroy her career if she filed a complaint for sexual assault in the workplace.

195. As a result, Plaintiff was shaken, confused, terrified, and intimidated for years.

196. Crowley, through its actual or apparent agents, representatives, servants, and/or employees:

- a. intimidated threatened, and gaslit the Plaintiff;
- b. threatened the Plaintiff that she did not want Juan Emilio Blanco as an enemy;
- c. threatened the Plaintiff to "*cooperate, or you will get fired in a snap;*"

- d. threatened the Plaintiff that it would be her word against that of the sexual assaulter;
- e. warned the Plaintiff that she needed to be careful about reporting sexual assault in the workplace because no one would believe her;
- f. threatened the Plaintiff that no one would believe her because of her “*Latin culture*;”
- g. threatened the Plaintiff that the higher ups at Crowley will think that the Plaintiff provoked the sexual assault;
- h. warned the Plaintiff not to report Juan Emilio Blanco because he was a star employee that Crowley loved;
- i. warned the Plaintiff not to report the sexual assault because she was a single mom who needed to think about supporting her son rather than risk getting fired;
- j. threatened that Plaintiff’s child would “*go hungry*;”
- k. threatened to ruin Plaintiff’s reputation; and
- l. actively covered up the known history of sexual assault at Crowley.

197. It took Plaintiff years to understand the scope of her physical, emotional, and psychological torment caused by her sexual assault in the workplace.

198. The lasting effects are still felt by Plaintiff to this day, as she deals with post-traumatic stress disorder, anxiety, depression, and panic attacks.

199. As a result of Crowley's negligence, Plaintiff was raped in the workplace. She suffered and continues to suffer physical pain, mental anguish, loss of enjoyment of life, and incurred psychiatric expenses. The injuries are permanent or continuing in nature, and Plaintiff will suffer the losses and impairments in the future.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

EIGHTH CAUSE OF ACTION

(Negligent Misrepresentation)

Against CROWLEY MARITIME CORPORATION

200. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

201. Crowley and LaMoureaux' internal investigation confirmed that Mrs. Treminio was telling the truth about being raped by her supervisor, Blanco, during a Crowley business trip in Jacksonville, Florida.

202. Initially, LaMoureaux thanked Mrs. Treminio for having the courage to speak up about her rape.

203. Crowley and LaMoureaux made statements concerning material facts to Plaintiff, including statements that Crowley maintained a safe workplace and that harassment was not tolerated.

204. Crowley and LaMoureaux knew these statements were false.

205. At all material times, Crowley stated that it maintained a safe workplace.

206. Plaintiff relied on Crowley's statement in accepting and continuing employment with Crowley.

207. There was at least one prior act of sexual misconduct by Plaintiff's supervisor which took place and was reported to Crowley before the Plaintiff was sexually assaulted.

208. Crowley did not have an effective and independent human resources department, and Crowley had deficient operational practices for training and supervising its personnel.

209. The following public statements also show, in part, the extent of Crowley's misrepresentations to Plaintiff:

- a. “We obey the law. We go beyond to protect our employees and our environment. We leverage our diversity of people and ideas. We treat everyone as we would want to be treated ourselves” Tom Crowley, Chairman and CEO.



Available at <https://www.crowley.com/company-overview/ethics/>

- b. “Crowley is committed to providing a work environment free from harassment of any kind.”

Appropriate Conduct

Harassment & Sexual Harassment

Crowley is committed to providing a work environment free from harassment of any kind. Harassment in the workplace is behavior that is unwelcome and offensive to specific individuals or groups or that unreasonably disrupts their work. Harassment can take many different forms and may include verbal or physical conduct that denigrates or shows hostility toward an individual and can reasonably be perceived as threatening, offensive, and/or insulting.

Anyone that experiences harassment or sees others being harassed should immediately:

- Tell the harasser to stop, and/or;
- Report the action to his/her Crowley representative and/or;
- Report the action to the Ethics Hotline at www.EthicsPoint.com.

Available at <https://www.crowley.com/code-of-conduct/#harassment-amp-sexual-harassment>

- c. “At Crowley, women are empowered and encouraged to lead despite transportation being historically male-dominated,” said Stephanie Johnson, director of operations integrity, Crowley Logistics. “Our company provides opportunities for contribution and leadership with a commitment to equity and inclusion. I’m proud to work at Crowley and encourage other women to grow in their career with Crowley.”

Available at <https://www.crowley.com/news-and-media/press-releases/women-in-transportation/>

- d. “I encourage all employees to think about how their knowledge, background and experiences can contribute to Crowley’s success and encourage them to share their ideas with their peers and leaders of this organization.” Tom Crowley Jr., Chairman and CEO.



The diversity of thought, experience, culture, attitude and background brought forth by our employees allows us to develop unique, innovative solutions for our customers and keeps us at the forefront of our industry.

I encourage all employees to think about how their knowledge, background and experiences can contribute to Crowley’s success and encourage them to share their ideas with their peers and leaders of this organization

Because although we are all different, we are stronger together as One Crowley, One Team.

Tom Crowley Jr., Chairman and CEO

Available at <https://www.crowley.com/careers/diversity-inclusion/>

e.



(Chairman and CEO Tom Crowley posing for a picture with Plaintiff.)

f.



(Plaintiff with Fellow Members of Crowley’s “Diversity & Inclusion Committee” at Crowley corporate headquarters in Jacksonville, Florida)

210. Crowley knew these statements to be false.

211. Crowley and LaMoureaux used their ability to affect Plaintiff's quality of life and financial security in making these misrepresentations.

212. Crowley intended and expected that Plaintiff would rely on its statements.

213. These statements induced Plaintiff to trust Crowley and LaMoureaux and continue employment at Crowley.

214. Plaintiff justifiably relied on Crowley's false statements to her detriment.

215. These false statements directly and proximately harmed the Plaintiff.

216. Crowley and LaMoureaux ultimately threatened and intimidated the Plaintiff into silence because they were concerned about the Plaintiff discussing the rape and the subsequent coverups with others.

217. Lamoureux and Crowley stifled Mrs. Treminio's attempts to share her ideas with her peers and leaders of the Crowley organization.

218. LaMoureaux intimidated Mrs. Treminio not to file a complaint with Human Resources and suggested to Mrs. Treminio that maintaining Crowley's image was crucial to her continued job security.

219. Contrary to Crowley's statement in its code of conduct, Crowley was not "committed to providing a work environment free from harassment of any kind" in Mrs. Treminio's case.

220. Contrary to Crowley's statements to the Plaintiff and the public, Crowley did not obey the law. Crowley did not "go beyond" to protect its employees.

221. Crowley did not offer the Plaintiff any support or counseling, and she fell into a downward spiral of depression.

222. In January 2021, Crowley terminated Mrs. Treminio's employment because she was seeking psychological and neurological treatment to cope with the trauma of being raped by her supervisor in the workplace and being bullied into silence.

223. As a result of Crowley's negligent misrepresentations to the Plaintiff, she was lured into a false sense of trust following her rape in the workplace. Upon realizing the extent of the misrepresentations, she became horrified and depressed, and Crowley fired her. She suffered and continues to suffer physical pain, mental anguish, loss of enjoyment of life, and incurred psychiatric expenses. The injuries are permanent or continuing in nature, and Plaintiff will suffer the losses and impairments in the future.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

NINTH CAUSE OF ACTION

(Intentional Infliction of Emotional Distress)
Against CROWLEY MARITIME CORPORATION

224. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

225. Crowley had a duty to protect its employees, and the Plaintiff in particular, from people with a known dangerous propensity for sexual misconduct, assault, and violence in the workplace, such as Juan Blanco.

226. Crowley's employee, Blanco, forcibly raped Plaintiff on a business trip in Jacksonville, Florida.

227. Mrs. Treminio followed Crowley protocol, as expressed in the code of conduct:

- a. Tell the harasser to stop, and/or;
- b. Report the action to his/her Crowley representative and/or;
- c. Report the action to the Ethics Hotline at www.EthicsPoint.com

228. Crowley and LaMoureaux threatened and intimidated the Plaintiff into silence because they were concerned about the Plaintiff talking about the rape and the subsequent coverups to others.

229. LaMoureaux and Crowley stifled Mrs. Treminio's attempt to speak up about her rape in the workplace and the subsequent trauma.

230. LaMoureaux intimidated Mrs. Treminio not to file a complaint with Human Resources and suggested to Mrs. Treminio that maintaining Crowley's image was crucial to her continued job security.

231. The Plaintiff spiraled into a state of depression.

232. In January 2021, Crowley terminated Mrs. Treminio's employment because she was seeking psychological and neurological treatment to cope with the trauma of being raped by her supervisor in the workplace and being bullied into silence.

233. Crowley offered Mrs. Treminio \$600 to sign a settlement and confidentiality agreement agreeing to keep quiet about the sexual misconduct, assault, and violence in the workplace and to waive her right to sue Crowley.

234. Mrs. Treminio refused to sign such an agreement.

235. Crowley withheld her last paycheck unless she signed Crowley's settlement and confidentiality agreement.

236. A labor authority in El Salvador intervened and compelled Crowley to pay Mrs. Treminio's unpaid salary and fined Crowley for its abusive labor practices.

237. After Crowley fired Mrs. Treminio, she posted about the sexual abuse and her ordeal at Crowley on her private social media accounts.

238. Mrs. Treminio received written threats and harassing messages from Crowley's counsel which further traumatized and intimidated Mrs. Treminio.

239. On or about January 2021, Crowley and/or its agents, servants, and/or employees intentionally and deliberately inflicted mental and emotional distress on Mrs. Treminio by and through, but not limited to, all of the above acts and omissions.

240. Crowley's retaliatory conduct was outrageous.

241. Crowley's withholding of Plaintiff's final paycheck was outrageous.

242. Crowley's coercion of Plaintiff to remain silent was outrageous.

243. Crowley's badgering and threats to take down her private social media posts were outrageous.

244. The combined effect of Crowley's acts and omissions was extreme and outrageous under the circumstances.

245. Crowley acted intentionally and/or recklessly in a manner calculated to inflict severe emotional distress and mental suffering upon Mrs. Treminio, who was already severely depressed due to the psychological trauma of having been raped by her supervisor.

246. As a direct and proximate result of Crowley's conduct, Mrs. Treminio suffered severe emotional distress in the form of psychiatric and psychological harm, emotional pain, mental anguish, depression, insomnia, humiliation, loss of dignity, loss of enjoyment of life, past and future medical expenses, and her reputation was tarnished. These losses are continuing and will continue in the future.

247. Crowley wantonly and knowingly subjected Mrs. Treminio to the mental anguish referenced herein.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

TENTH CAUSE OF ACTION
(Negligent Infliction of Emotional Distress)
Against CROWLEY MARITIME CORPORATION

248. Plaintiff incorporates the allegations in paragraphs 1 through 100, as if fully set forth herein.

249. Crowley and LaMoureaux intimidated Mrs. Treminio not to file a complaint with Human Resources and suggested to Mrs. Treminio that maintaining Crowley's image was crucial to her continued job security.

250. On or about January 2021, Plaintiff suffered severe emotional distress from being subjected to threats and intimidation by Crowley after she was raped by her supervisor on a business trip in Jacksonville, Florida, bullied into keeping quiet about the ordeal, and fired.

251. Crowley offered Mrs. Treminio \$600 to sign a settlement and confidentiality agreement agreeing to keep quiet about the sexual misconduct, assault, and violence in the workplace and to waive her right to sue Crowley.

252. Mrs. Treminio refused to sign such an agreement.

253. Crowley withheld her last paycheck unless she signed Crowley's settlement and confidentiality agreement.

254. A labor authority in El Salvador intervened and compelled Crowley to pay Mrs. Treminio's unpaid salary and fined Crowley for its abusive labor practices.

255. After Crowley fired Mrs. Treminio, she posted about the sexual abuse and her ordeal at Crowley on her private social media accounts.

256. Mrs. Treminio received written threats and harassing messages from Crowley's counsel which further traumatized and intimidated Mrs. Treminio.

257. Mrs. Treminio suffered severe emotional distress because she was subjected to severe mental anguish and emotional harm after reporting that she was raped by her supervisor in the workplace.

258. At all material times, Plaintiff was undergoing psychological treatment for the trauma of being raped in the workplace and was further placed in immediate risk of harm by Crowley's conduct.

259. Crowley's negligence caused Plaintiff severe mental anguish and emotional harm by being subjected to threats, intimidation, salary withholding, and being pressured to sign a \$600 settlement and confidentiality agreement.

260. At all material times, Crowley knew or should have known that it was inflicting severe emotional distress to Plaintiff who was emotionally vulnerable following the trauma of being raped by her supervisor.

261. As a direct and proximate result of Crowley's negligent infliction of emotional distress, Mrs. Treminio suffered psychiatric and psychological harm, emotional pain, mental anguish, depression, insomnia, humiliation, loss of dignity, loss of enjoyment of life, past and future medical expenses, and inconvenience in the normal pursuits and pleasures of life. These losses are continuing and will continue in the future.

WHEREFORE, Plaintiff respectfully requests this Court to enter judgment against Defendant Crowley for compensatory damages, consequential damages, and punitive damages in an amount to be determined at trial, as well as interest, costs, and for such further and other relief as this Court deems appropriate and demands a trial by jury.

DEMAND FOR JURY TRIAL

262. Plaintiff respectfully demands a trial by jury for all issues so triable in this action.

CERTIFICATE OF SERVICE

I certify that on March 30, 2022, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing.

Respectfully submitted,

/s/ Adria G. Notari

ADRIA G. NOTARI

Florida Bar No. 87272

NOTARI LAW, P.A.

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/s/ J. Ryan Melogy

J. RYAN MELOGY

pro hac vice

Maritime Legal Solutions, PLLC

276 Fifth Ave., Suite 704-1454

New York, NY 10001

Telephone: (302) 827-3890

E-mail: maritimelegalsolutions@pm.me

Exhibit 2

From: Campos, Lennys
Sent: Tuesday, May 1, 2018 10:29 AM
To: Weist, Robert
Cc: King, Tiffany
Subject: 20180430 DFTS RSM & Admin Teams EL SAL Trip Report.docx
Attachments: 20180430 DFTS RSM & Admin Teams EL SAL Trip Report.docx

Good morning Bob and Tiffany,

Thanks for the opportunity to provide my input regarding the Inland Commercial Admin team's concerns. Attached please find my trip report, please let me know if you have any additional questions or comments.

Regards,

Lennys Campos



Lennys N. Campos
MANAGER, BROKERAGE SERVICES, DFTS - LAND
TRANSPORTATION | Crowley Logistics
o 904.727.2231 | m 904.887.0455
lennys.campos@crowley.com





DFTS RSM SAL TEAM

TRIP REPORT

Visited DFTS RSM team members in El Salvador. Reviewed work processes, conducted one-on-one meetings, participated in IT support sessions, and addressed RSM team's concerns. Additionally, had the opportunity to shadow the Inland Transportation Admin team members to review processes and leverage best practices, as well as tended to individual meeting requests from team members.

This report summarizes findings and assessment from the one-on-one meetings with both teams' members.

Inland Commercial Admin Team

WORK ENVIRONMENT

- Low morale, stressful and tense work environment
- Manager (Jose Lopez) & main lead (Mario Granada)
 - Create and contribute to a hostile work environment
 - Exhibit intolerable and unacceptable behavior, abuses power
 - Demonstrate discriminatory practices, specially towards women

Employees' Statements

- Afraid of retaliation from Jose Lopez
 - "hear others have complaint and nothing has been done before..."
 - "he will treat me worse than now and I could lose my job..."
- Afraid to formally complain or report issues/behavior
 - HR might disregard complaints/issues (e.g., situation with Juan Blanco)
 - Management/HR are friends with Jose Lopez (things going on for over one year)
- Notices difference with another teams' environment
 - "Felt ready to give up, defeated", took courage to ask to speak to someone
 - Grateful someone is willing to listen, and hopeful something will be done this time

SITUATIONAL ASSESSMENT

Both **J. Lopez** (manager) & **M. Granada** (lead)

- Create and contribute to a toxic work environment
 - Used aggressive, offensive, and profane verbal language
 - Berating, yelling, cursing team members (also described as bullying)
- Retaliate after employees raised issues/concerns
 - Established and kept PIPs without proper follow up and using it to disqualify employee from raises, promotions, or job transfer opportunities
 - Dismissive, condescending, excluding/segregating and isolating members/women
 - Discourage or rejects requests for vacation/breaks
- Behaved unprofessionally and disrespectfully
 - (J.L) Blames employees for firing of team's supervisor, creates more work for him
 - (J.L.) Expressed "women do not deserve to be supervisors or managers, should not aspire to higher positions because they are too emotional, dumb, will embarrass him, ...sure that won't do a good job"
 - (M.G.) yields at team leads and team members in-front of others and often uses profanity, also threatens to go to the manager
- Harbor mistrust and animosity
 - Discouraged team from expressing themselves or raising issues, too busy...
 - Mario Granada uses authority and behaves as supervisor vs. one of 3 team leads, Jose tends to talk only with Mario to assign work/communicate
 - Unfairness as loyalty not performance is rewarded (MG takes credit for others work)



EMPLOYEES EMOTIONAL STATE

- Stressed/Pressured
- Fearful of retribution
- Ignored/Defeated/De-moralized
- Degraded/Disrespected
- Frustrated/Disappointed (with leadership & HR) – Employee Assist/Ethics Line
- Expressed interest in opportunity to move to another Crowley position to leave ADMIN group

EMPLOYEE WHO REQUESTED (ONE-ON-ONE) MEETINGS & INPUT INLCUED ABOVE EI SAL-Inland Admin

(Team composition: 13 employees, including 3 male leads & 7 females)

- Marlon [REDACTED]
- Evelyn [REDACTED]
- Assant [REDACTED]
- Alejandra [REDACTED] (canceled – feared been seen talking)

EI SAL-RSM (ex. Inland Admin)

(Team composition: 8 employees, including 1 supervisor)

- Vanessa Tremino
- Blanca [REDACTED]
- Erick [REDACTED]
- [REDACTED]

JAX-Commercial Admin – additional comments incorporated

(Team composition: 4 employees, including 3 females)

- Jessica [REDACTED] (4/27/18)

From: Monroy, Heitzel <Heitzel.Monroy@crowley.com>
Sent: Monday, April 30, 2018 6:42 PM
To: Matute, Senobia
Attachments: CONFIDENTIAL.docx

Hello,

Te envié el reporte comencé en inglés después estuve en reunión y lo termine en español.

Me avisas cualquier consulta.

Saludos,



**CONFIDENTIAL
MEMORANDUM**

To: Senobia Matute
From: Heitzel Monroy

Date: April 30, 2018

SUBJECT: ALLEGATIONS TRUCKING BROKERAGE DEPARTMENT

Attendees:

1. Assant [REDACTED]
2. Gabriela [REDACTED]
3. Luis [REDACTED]
4. Alejandra [REDACTED]
5. Karla [REDACTED]
6. Marlon [REDACTED]
7. Evelyn [REDACTED]

Summary of Allegations

Internal Audit Department received allegations on April 27, 2018. These allegations are to the following employees:

1. Jose Lopez
2. Mario Granada
3. Pedro Espinoza

The allegations are the following:

1. Jose Lopez told Mario Granada that Assant [REDACTED] y Blanca were having a PIP because of their performance. The attendees commented that this information about the PIP program is confidential and Jose Lopez made them feel uncomfortable telling about their situation to another employee.

Blanca never received information why she got a PIP from Jose Lopez.

2. The attendees said that when Jose Lopez came to El Salvador before Juan Blanco was removed, Jose Lopez came with a bad attitude, yelling to the team and ignoring anything that the team wanted to talk to Jose Lopez. The only person that got his attention and talked to in a good way was to Mario Granada.

3. Jose Lopez always use the word “**coño**” in a sentence and that makes them feel uncomfortable and offended. The attendees said this type of vocabulary is not expected to be use from a leader.
4. Mario Granada is always saying bad things about the performance of the team so they can look bad in front of Jose Lopez. The thing that Mario informs to Jose Lopez are not true or he changes the real story of what happened.
5. Alejandra comenta que Jose Lopez y Mario Granada la regañaron por estar apoyando al equipo de DFTS, en su momento ella vio el proceso y le estaban haciendo unas consultas.
6. Comentaron que Jose Lopez le dijo al nuevo team de DFTS que no le hablara a su equipo.
7. Comentaron que muchas veces el equipo le ha pedido ayuda a Jose Lopez de hacer extra tiempo o que contrate mas personal e incluso le han presentado reportes numéricos del volumen de trabajo para evidenciar que si necesitan mas ayuda. Pero Jose Lopez les niega el apoyo y les ha incrementado mas el trabajo a realizar.
8. Comento Luis que un dia Jose Lopez se le acercó y le consulta que como actuaba Mario Granada. Luis le dijo que Mario Granada le había faltado el respeto a Assant donde Mario le grito enfrente de todo el equipo y que no era manera de actuar. Jose Lopez no hizo nada por arreglar la situación.
9. En una reunión que tuvieron con Jose Lopez posterior al caso de Juan Blanco, el equipo le comento que con Mario Granado siempre habían tenido problemas desde que esta Juan Blanco y además le comentaron que este se atribuía el trabajo de los demás y no daba reconocimiento al quien lo merece.
10. Mario Granada siempre se queda después de la 4 de la tarde en un enclave para informarle a Jose Lopez el desempeño del equipo y el detalle de cosas que hacen los empleados cuanto tiempo se tardaron en el baño, en la hora de receso, en la hora de almuerzo o si se levantaron cuanto se tardaron e incluso que pasan haciendo en las computadoras.
11. Karla [REDACTED] es una empleada una dice que ha sentido la tensión del acoso laboral y la falta de apoyo que tienen por parte de Mario Granada. Incluso Pedro comento que siempre esta pendiente del team para ponerlos en mal y este ni siquiera es lead ni supervisor. Adicional comento que Mario no les da reconocimiento del trabajo que realizan.

Karla comenta que Pedro la fiscaliza todo el tiempo y hasta le cuenta el tiempo de como se hace el trabajo.

12. Comentaron que un día Pedro reunión a Luis para decirle que su equipo se estaba pasando de las horas de su receso y almuerzo. Entonces Luis le dijo que por favor dejara a su gente tranquila porque el estaba pendiente de esas situaciones y que incluso almorzaban juntos y se cumplía con el tiempo establecido.
13. Alejandra comento una situación que le incómodo. El martes 24 de abril del 2018 fui a recibir un entrenamiento de LOC donde sus jefes lo aprobaron. Al Alejandra irse al LOC quedaba como back up Pedro y Mario, pero estas dos personas no le dieron seguimiento a nada del trabajo de Alejandra. Al ella llegar a su posición al día siguiente su trabajo está bien atrasado porque nadie la había apoyado. Posteriormente Alejandra le llamo a Jose Lopez para reportarle la situación. La respuesta de Jose Lopez fue que quizás Alejandra no le había informado a Mario que iba para el LOC, pero Mario fue el que envió el correo a People Development para informar quienes de su equipo irían.

Alejandra comento que no le están pagando horas extras.

14. El team comento que Jose Lopez se enoja si no comparten lo que el piensan y que si ellos comentan lo que piensan hasta los puede despedir. Jose Lopez no le pueden dar un feedback y muchas veces no les ponen y los deja ignoradas.
15. Jose Lopez ha realizado comentarios machistas, ya que cuando quería contratar al supervisor Jose Lopez menciona que solo quería entrevistar a hombre y que no quería que le pasaran mujeres para entrevistar.

Adicionalmente comentan que muchas de las empleadas de Shared Services El Salvador quisieran aplicar a esa posición de supervisor de Trucking Brokerage. Que no aplican porque Jose Lopez ve de menos a las mujeres y no tiene buena actitud con las personas.

16. Un día que hablaron con Lennys sobre algunos temas de Jose Lopez y les comento que había tenido algunos problemas con Jose Lopez.
17. Evelyn le dijo a Jose Lopez que le gustaría aplicar a la plaza de Supervisor, pero Jose Lopez la ignora y no la toma en cuenta y solo se dirigió a Mario.
18. Alejandra comento que escribió unos SOP sobre unos procesos que realiza y antes de enviárselos a Mario Granada les puso una marca de agua al archivo para que se viera que ella los había hecho. Ya que Mario les pide que le manden la información y este lo revisa y le hace unas modificaciones. Posteriormente Mario lo envía al jefe como que si lo hubiera hecho.
19. Comenta el team que Mario Granada no tiene los conocimientos necesarios para ser supervisor porque muchos de los procesos no los entiende cómo deben realizarle. Y

además porque no tiene los skills para tratar al personal, apoyarlo y darle una guía para ser mejores.

20. Comentaron que Jose Lopez solo le enseñan a Mario y deja de lado a los demás Leads que están en el equipo.
21. El team comento que Mario Granada es un Juan Blanco.
22. El team se siente frustrado y acosado laboralmente por Jose Lopez, Mario Granada y Pedro Espinoza.

Pedro siempre tiene una risa burlesca para los compañeros del equipo.

Mario Granada siempre esta pendiente de cada movimiento que el equipo realizando y revisando constantemente que están haciendo en sus computadoras y esto les incomoda.

Que Jose Lopez les ha comentado a Mario y Pedro todas las acusaciones que se han presentado y les ha advertido que los estarán investigando. Para el team estos temas deberían de ser confidenciales y no estarles informando a ellos sobre esa situación.

23. Comentaron un caso de Rodrigo Calderon tenía una semana en el departamento y se le estaba dando live training. La situación fue que Rodrigo estaba desempeñando una tarea asignada y Pedro se le acercó para revisar lo que estaba realizando. Al Pedro ver su trabajo le dijo a Rodrigo le dijo de mala manera que tenía un minuto para encontrar el error que había cometido y Rodrigo se sintió mal y muy nervioso ante la reacción de Pedro. Al ver esta situación Luis y Evelyn se involucraron y le dijeron a Pedro que no fuera así con Rodrigo que el era nuevo y la respuesta de Pedro fue que en este departamento nadie debe cometer errores. El team comento que no es la forma de reaccionar y que además Pedro no es el supervisor para que este atento al trabajo de los demás.
24. Marlon comento que cuando Jose Lopez le realizo su evaluación, Jose Lopez se encargó hablar más de sí mismo que darle el coaching debido y ayudarlo en decirle si había algo que mejorar.
25. Comento el team que Mario cuando ha realizado unos procesos de pago se ha equivocada y en una ocasión hizo un mal pago de un aproximado de \$12K, nadie le dijo nada. El team comenta que si alguien de ellos lo hubiera hecho ya estuviera despedido. El equipo de CTSI identifico otros errores de pago por parte de Mario y que incluso muchos de esos no son recuperables.
26. El team comento que Jose Lopez no tiene sentido humanitario. Ya que cuando Vanessa Tremino y Luis se encontraba en Puerto Rico y se le estaba teminando el dinero, Luis le escribió a Juan Blanco con copia Jose Lopez diciéndole que ya se le

estaba acabando el dinero y la respuesta de Juan fue “Tu quieres el dinero para ir a beber alcohol con la Vanesa” y Jose Lopez no dijo nada sobre este tema.

27. Muchos del team fueron al LOC este martes 24 de abril 2018 y comentan que Jose Lopez y Mario Granada son todo lo contrario a los que les enseñaron en ese curso.
28. Uno de los integrantes comento que conoce a Mario Granada desde otro lugar de trabajo que se llama Sykes. Mencionó que a Mario Granada lo despidieron por acoso sexual de ese lugar. Se dio cuenta ya que la hermana trabajo en la misma cuenta donde estaba Mario y de hecho ella fue víctima de acoso sexual por parte de él. Adicional comento que esto se lo habia reportado a Jose Lopez en privada que estaban en una sala de conferencias y Jose Lopez no la escucho y se enojó y le pidió que se saliera de la sala de conferencias.
29. Mario y Pedro son malos y sarcásticos y mal hablados al momento de hablar con el equipo.
30. Comentaron que Pedro siempre llega tarde, pero es al único que Mario no le dice nada y le deja pasar varias situaciones.

Comentan que hoy en dia Mario le pide cosas a Pedro que haga como tomarles el tiempo en el trabajo que el team realiza, ver las horas de almuerzo, receso, el tiempo que se levanta y estar pendiente de los monitores de los demás para este reportárselos al final del dia y no acusen a Mario que sigue con este comportamiento de acoso laboral con los compañeros ya que Jose Lopez ya le informo a Mario y Pedro sobre las alegaciones que se han hecho.
31. Mario Granada antes de ponerlo como lead hacia el proceso de payment status, pero hablo con Jose Lopez que no quería continuar con ese proceso ya que no le gustaba y por eso se lo asignaron a Alejandra.
32. Jose Lopez le hizo un comentario a Marlon cuando este se encontraba en Jacksonville trabajando. Le dijo Jose Lopez que necesitaba que le sacara toda la información a una compañera de Jacksonville porque esa era una estúpida que no sabia nada y que posteriormente la iban a despedir cuando Marlon le sacara la información.
33. El equipo comento que Jose Lopez y Mario Granada no tienen buena relación con las personas de Jacksonville del mismo equipo.

**Case: 309 - Hotline Web
Non-Union Issues
Inappropriate/Unprofessional Behavior**

Case Snapshot

Opened: 03/16/2018
Days open: 26
Last modified: 09/06/2018 9:46 AM
Date closed: 04/11/2018 5:11 PM
Intake method: Hotline Web
Status: Closed
Alert: Green

General Case Info

Case number:
309
Received/Reported date:
03/16/2018
Language:
Spanish
Assigned tier:
Non-Union Issues

Issue
Primary issue:
Inappropriate/Unprofessional Behavior

Case Details [Show Original Case Details](#)

Reported tier information

Case type:
Allegation
Intake method:
Hotline Web

Location

Organization/Building name:
Non-Union Issues
Branch number:
SHARED SERVICES
Location name:
SANSS
Location/Address:
EDIF. CORPORATIVO AVE OLIMPICA, SOBRE LA AVE OLIMPICA ENTRE LA 65 Y 67 AV SUR, COLONIA ESCALON
City:
SAN SALVADOR
Country/Territory:
El Salvador

Reporter contact information

Is the reporter an employee?

Yes

Reporter anonymous:

Yes

Case Information

Crowley Business Unit Where Issue Occurred:

Crowley Logistics

Crowley Department Leading Investigation:

Human Resources

Please identify the person(s) engaged in this behavior:

Mario Granada - Lead CLS
Jose Lopez - Brokerage Manager

Do you suspect or know that a supervisor or management is involved?

Sí

If yes, then who?

Jose Lopez, Manager de Brokerage Services

Is management aware of this problem?

No sabe / no desea revelar

What is the general nature of this matter?

Trato altanero y no profesional por parte de Mario Granada en el departamento de Inland Operations.

Where did this incident or issue/concern occur?

Se dio en el 5to piso de nuestras oficinas, nuestro departamento en El Salvador es conocido como Inland Operations.

Please provide the specific or approximate time this incident occurred:

Aproximadamente 10:00am del dia viernes 16 de marzo de 2018

How long do you think this problem has been going on?

De uno a tres meses

How did you become aware of this issue/concern?

Me pasó a mi

Please identify any persons who have attempted to conceal this problem and the steps they took to conceal it:

Jose Lopez, en la mayoría de los casos le ha dicho que no se preocupe que con su respaldo no va a pasar nada, eso Mario directamente me lo ha dicho y eso empodera su comportamiento.

Details:

Mario Granada tiene una posición de Lead de la cual está teniendo un comportamiento inadecuado con varios de los compañeros de trabajo, desde conductas altaneras, hasta levantar la voz e incluso usar lenguaje inapropiado con más de alguno, además del favoritismo que se le ha dado por parte del manager Jose Lopez, quien está cegado por hacerlo supervisor, aun y cuando nos ha preguntado a todos por separado si nos parece bien su conducta y aun sabiendo nuestra negativa, insiste en favorecerlo con capacitaciones y demás conocimiento que al resto de Leads y/o coordinadores del grupo. A nivel personal tuvo a bien tratarme con desden y arrogancia desmereciendo mi trabajo y tratarme como una persona sin conocimiento frente a varios de mis compañeros. NO me parece ético que esta persona sea considerada un Lead mucho menos a la larga un supervisor impuesto por un manager que le cubre todo desde 2017.

Details translated:

Location:
CORPORATIVE BLDG. AVE OLIMPICA, ON AVE OLIMPICA BETWEEN 65 AND 67 AV SOUTH, ESCALON COUNTY
SAN SALVADOR

Please identify the person(s) engaged in this behavior:

Mario Granada - Lead CLS
Jose Lopez - Brokerage Manager

Do you suspect or know that a supervisor or management is involved?

Yes

If yes, then who?

Crowley/Treminio 000609



Jose Lopez, Manager of Brokerage Services

Is management aware of this problem?
Do not know / do not wish to disclose

What is the general nature of this matter?
Arrogant and unprofessional treatment by Mario Granada in the department of Inland Operations.

Where did this incident or issue/concern occur?
It occurred on the 5th floor of our offices, our department in El Salvador is known as Inland Operations.

Please provide the specific or approximate time this incident occurred:
Approximately 10:00am on Friday, March 16, 2018

How long do you think this problem has been going on?
1 to 3 months

How did you become aware of this issue/concern?
It happened to me

Please identify any persons who have attempted to conceal this problem and the steps they took to conceal it:
Jose Lopez, in the majority of cases has told him not to worry that with his support nothing will happen, Mario has told me that directly and that emboldens his behavior.

Details:
Mario Granada is in the Lead position for which he has inappropriate behavior with several of the coworkers, from arrogant behaviors, to raising his voice and even using inappropriate language with more than one [person], on top of the favoritism that has been given to him by the manager Jose Lopez, who is blinded by his being a supervisor, despite that he has asked us all separately what we think of his conduct and even knowing our disapproval, he insists on favoring him with trainings and more skills than the rest of the group's Leads and/or coordinators. He has treated me personally with disdain and arrogance[,] devaluing my work and treating me like an ignorant person in front of several of my coworkers. It does NOT strike me as ethical that this person would be considered a Lead much less eventually a supervisor imposed by a manager who has covered for him on everything since 2017.

Follow-ups

Reporter Additional Information

There are no additional notes for this incident.

Questions/Comments and Reporter Responses

03/19/2018 - Matute, Senobia

Comment: Dear reporter, I will like to assign your case to Jacqueline Najera, so you can talk more about the incident and the situation that you are reporting. Please let me know if you are willing to share your contact information so she can contact you promptly.

03/19/2018 - Reporter

Reply No, I don't want Jacqueline Najera taking my case, please be kind to provide my information directly to Senobia Matute as soon as possible. My name is [REDACTED] my desk ext [REDACTED] my cell phone [REDACTED] my email [REDACTED]@crowley.com

03/20/2018 - Matute, Senobia

Comment: Thank you [REDACTED] for your quick response. This is Senobia Matute and I will directly be contacting you to your cell phone.

03/20/2018 - Reporter

Reply Thank You Senobia, I'll wait for your call whenever you have some time to talk.

Info Contributors

None

Participants

Crowley/Treminio 000610

Name	Job Title	Relationship	Role	Results	Notes
Mario Granada	Lead CLS	None	None	None	
Jose Lopez	Brokerage Manager	None	None	None	

Items

Name	Description	Loss Type	Final Outcome	Amount Taken	Amount Recovered	Amount to Recover
Totals:				\$0.00	\$0.00	\$0.00

Agencies

None

Attachments

Files

File	Category	Date	Description
Ethics SummaryJM.docx	Other	04/11/2018 05:10:00 PM	Report
Action Plan - Jose L Marquez.msg	Other	04/11/2018 05:11:00 PM	Action Plan presented by JM

Synopsis

Outcome of case

Primary outcome:

Substantiated

Action taken:

Discipline

Additional details

Tasks

None

Case Notes

04/11/2018 5:08 PM - Matute, Senobia

An investigation was performed in his area with 12 of his employees and a report was presented by Jacqueline Najera. Jacqueline Najera and myself met with Jose Marquez to present him the findings and give him the opportunity to review them. An action plan was presented by Jose Marquez to improve the perception in his area.

Exhibit 3

Case: 280 - Hotline Web
Non-Union Issues
Inappropriate/Unprofessional Behavior

Case Snapshot

Opened: 11/7/2017
Days open: 13
Last modified: 11/16/2017 9:33 AM
Intake method: Hotline Web
Status: Unreviewed
Alert: Green

General Case Info

Case number: 280
Received/Reported date: 11/7/2017
Language: English
Assigned tier: Non-Union Issues

Issue

Primary issue: Inappropriate/Unprofessional Behavior

Case Details

Reported tier information

Case type: Allegation
Intake method: Hotline Web

Location

Organization/Building name: Non-Union Issues
Branch number: LOGISTICS
Location name: SANSS
Location/Address: EDIF. CORPORATIVO AVE OLIMPICA, SOBRE LA AVE OLIMPICA ENTRE LA 65 Y 67 AV SUR, COLONIA ESCALON
City: SAN SALVADOR
Country: El Salvador

Reporter contact information

Is the reporter an employee? Yes
Reporter anonymous: Yes

Case Information

Please identify the person(s) engaged in this behavior: Jaun Emilio Blanco - Supervisor
Do you suspect or know that a supervisor or management is involved? Yes
If yes, then who? Juan Emilio Blanco
Is management aware of this problem? Do Not Know / Do Not Wish To Disclose
What is the general nature of this matter? He is constantly yelling at personnel in general cursing at some of them and treating us with contract termination. He constantly (everyday) makes sexual comments about people from the team and from different teams. He conceals, promotes and approves this kind of behavior among the team in different practices such as Whatsapp group conversation sending sexual comments about people from the team and outside the team.
He courses at people by the way they do their work even if this is a direct consequence of the lack of training he provides. He conceals unprofessional behavior such as people coming to work with a hangover and excessive lunches and breaks.

Where did this incident or issue/concern occur? This is an ongoing behavior, it happens everyday, some days it's worst than others and some good resources have already quit working here because of his behavior. When he does not like somebody he pushes them with cursing at them, excluding them from the team activities and even work.

Please provide the specific or approximate time this incident occurred: I have witnessed and suffered this behavior since I started working in this company.

How long do you think this problem has been going on? 3 months to a year

How did you become aware of this issue/concern? It happened to me

Please identify any persons who have attempted to conceal this problem and the steps they took to conceal it: Nobody in the team has said anything as of yet since they are afraid that he will do something to them if he finds out that they have presented a report in HHRR.

Details: Juan makes really offensive sexual comments at all time of the day about people in the team and people from other teams. He encourages this kind of behavior among the team and has made some instant messaging groups in which he gives nicknames to men and women in the company, which goes from "fuck face" to making really bad comments such as "I would love to f... that girl, I bet she is really good at....." and above. Juan is not accessible at all when being asked for help, when we ask him form help he never replies back or makes sarcastic comments such us "figure it out yourself" or he even makes obscene signs at us with his middle finger.

Follow-ups

There are no additional notes for this incident.

Questions/Comments and Reporter Responses

11/16/2017 - Matute, Senobia

Question: Hello, my name is Senobia Matute, I am the new HR Regional Business Partner for Central America. I would be working in your case. I would like to know if your are willing to share with me your contact information so I can call you and discuss this situation.

Chat Transcripts

There are no chat transcripts for this incident.

Assignments & Access

Case assignee(s): Dodson, Melvin; Jirau, Zoraida; Kencitzski, Greg; King, Tiffany (Primary); La Moureaux, Arthur J; Matute, Senobia; Michel, Susan; Monroy, Heitzel

Restricted access: None

Case access list: Dodson, Melvin; Jirau, Zoraida; Kencitzski, Greg; King, Tiffany; La Moureaux, Arthur J; Matute, Senobia; Michel, Susan; Monroy, Heitzel

Due date: 11/17/2017

Info Contributors

None

Participants

Name	Job Title	Relationship	Role	Results	Notes
Jaun Emilio Blanco	Supervisor	None	None	None	

Items

Name	Description	Loss Type	Final Outcome	Amount Taken	Amount Recovered	Amount to Recover
Totals:				\$0.00	\$0.00	\$0.00

Agencies

None

Attachments

None

Synopsis

Outcome of case

Primary outcome: - Select One -

Secondary outcome 1: - Select One -

Secondary outcome 2: - Select One -

Action taken: - Select One -

Additional details

Tasks

None

Case Notes

None

Related Cases

Cases marked as related to this case

None

Exhibit 4

**Case: 282 - Hotline Web
Non-Union Issues
Concern**

Case Snapshot

Opened: 11/09/2017
Days open: 76
Last modified: 09/06/2018 9:54 AM
Date closed: 01/25/2018 5:48 PM
Intake method: Hotline Web
Status: Closed
Alert: Green

General Case Info

Case number:
282
Received/Reported date:
11/09/2017
Language:
Spanish
Assigned tier:
Non-Union Issues

Issue
Primary issue:
Concern

Case Details [Show Original Case Details](#)

Reported tier information

Case type:
Inquiry
Intake method:
Hotline Web

Location

Branch number:
SHARED SERVICES
Location name:
SANSS
Location/Address:
SANSS - SHARED SERVICES
EDIF. CORPORATIVO AVE OLIMPICA, SOBRE LA AVE OLIMPICA ENTRE LA 65 Y 67 AV SUR, COLONIA ESCALON
City:
SAN SALVADOR
Country/Territory:
El Salvador

Reporter contact information

Is the reporter an employee?

Yes

Reporter anonymous:

Yes

Case Information

Crowley Business Unit Where Issue Occurred:

Crowley Corporate Shared Services

Crowley Department Leading Investigation:

Human Resources

Details:

Desde hace meses para ser exacto 4 meses atras se percibe un ambiente hostil en el departamento, existe favoritismo con ciertas personas en el departamento las cuales sirven de chivo expiatorio para el supervisor, se siente una tension como si fuera una caza de brujas buscando siempre un culpable en vez de una aolucion en equipo. El supervisor tiene una actitud sumamente arrogante y egocentrista que no da credito a nadie mas que no sea a sus personas favoritas. El volumen de trabajo es excesivo, excluye a otras personas de horas extras ese soy yo un ejemplo, hay falta de reconocimiento, falta de comunicacion en temas importantes relacionado con trabajo, hasta cierto punto hay y existe un acoso laboral ya que aun incapacitado un dia me mando un correo diciendome que mis numeros estaban muy altos y que si pensaba trabajar en ello. Tambien responde de manera inapropiada ejemplo: pregunte si podia hacer horas extras 1 hora despues de que el habia mandando el correo y el solo respondio: "yo avise temprano" cuando para otras personas no existe pero alguno

Details translated:

Location:

SANSS - SHARED SERVICES

EDIF. CORPORATE AVE OLIMPICA, ON THE OLYMPIC AVE BETWEEN 65TH AND 67TH AV SOUTH, COLONIA ESCALON

SAN SALVADOR

Details:

For months[,] to be exact [since] 4 months ago[,] there's been a hostile environment in the department, there is favoritism with certain people in the department who serve as a scapegoat for the supervisor, you feel a tension like a witch hunt[, everyone] always looking for who's guilty instead of a team solution. The supervisor has a very arrogant and egocentric attitude he does not give credit to anyone but his favorite people. The volume of work is excessive, he excludes other people from overtime[,] I am an example of that, there is a lack of recognition, lack of communication on important issues related to work, to some extent there is and there exists a work harassment because despite being on a leave one day he sent me an email telling me that my numbers were very high and if I was thinking about working on that. He also responds inappropriately[, for] example: I asked if I could do 1 hour of overtime after he had sent the email and he just answered, "I warned [you] early" when for other people there are no buts at all

Follow-ups

Reporter Additional Information

11/10/2017 - Reporter

De la persona que me referia es Juan Emilio Blanco, supervisor de Inland

The person I'm referring to is Juan Emilio Blanco, supervisor of Inland

Questions/Comments and Reporter Responses

11/16/2017 - Matute, Senobia

Question: Buen dia estimado colaborador. Gracias por traer a nuestra atencion esta situacion. Mi nombre es Senobia Matute, y tengo bajo mi responsabilidad la region de Centro America en la posicion de Regional HR Business Partner. Me gustaria hablar con usted mas del caso. Si gusta y esta de acuerdo, puede proveerme su numero telefonico para poder contactarle y podamos hablar mas al respecto.

12/06/2017 - Matute, Senobia

Comment: Estimado colaborador, La proxima semana estare en El Salvador, Martes 12 y Miercoles 13 por la mañana. Espero 2 podamos tener oportunidad de hablar con respecto a su reporte y las observaciones que ha hecho en el mismo.

01/25/2018 - Matute, Senobia

Comment: HR Investigation was concluded, action taken was the termination of Supervisor Juan Blanco. Thank you for letting us know of this situation.

La investigación de RH fue concluida, la acción tomada fue el despido del Supervisor Juan Blanco. Gracias por informarnos de esta situación.

Info Contributors

None

Participants

None

Items

Name	Description	Loss Type	Final Outcome	Amount Taken	Amount Recovered	Amount to Recover
Totals:				\$0.00	\$0.00	\$0.00

Agencies

None

Attachments

None

Synopsis

Outcome of case

Primary outcome:
Substantiated

Action taken:
Termination

Additional details

Tasks

None

Case Notes

None

Exhibit 5

**Case: 283 - Hotline Web
Non-Union Issues
Harassment / Hostile Work Environment**

Case Snapshot

Opened: 11/09/2017
Days open: 76
Last modified: 09/06/2018 9:54 AM
Date closed: 01/25/2018 5:49 PM
Intake method: Hotline Web
Status: Closed
Alert: Green

General Case Info

Case number:
283
Received/Reported date:
11/09/2017
Language:
English
Assigned tier:
Non-Union Issues

Issue

Primary issue:
Harassment / Hostile Work Environment
Secondary issue 1:
Sexual Harassment

Case Details [Show Original Case Details](#)

Reported tier information

Case type:
Inquiry
Intake method:
Hotline Web

Location

Organization/Building name:
Non-Union Issues
Branch number:
SHARED SERVICES
Location name:
SANSS
Location/Address:
EDIF. CORPORATIVO AVE OLIMPICA, SOBRE LA AVE OLIMPICA ENTRE LA 65 Y 67 AV SUR, COLONIA ESCALON
City:
SAN SALVADOR



Country/Territory:

El Salvador

Reporter contact information

Is the reporter an employee?

Yes

Reporter anonymous:

Yes

Case Information

Crowley Business Unit Where Issue Occurred:

Crowley Logistics

Crowley Department Leading Investigation:

Human Resources

Details:

I'm reporting Juan Emilio Blanco, Inland operations supervisor because of his attitude with some members from the team, favoritism is a major problem. People who does not give their 100% has special benefits. Also, a few months ago there was an incident of sexual harassment inside the team. She reported that to Juan Emilio Blanco and instead of starting a process against the man who harassed her he started a process against her (for a different reason) and at the end she got fired, because the one who committed the act is one of his favorites. Also he refers to women (not from the team) in a disrespectful way, calling them names (offensives or sexistes even misogynists) Vacations is also a problem in the team since people is not allowed to take their 2 weeks vacations, only a week is the maximum people can take or split them in days, even though that is illegal in El Salvador. This was reported yo human resources and they did not know that was happening in the team, but when he found out the environment only became more hostile. If someone complains about not being able to take 2 weeks his answer is "there are people outside who wouldn't mind to take the vacations that way so if you are not ok with it you are free to quit" Most of these events have not been reported because of fear of losing the job. But the situation has become unbearable.

Follow-ups

Reporter Additional Information

There are no additional notes for this incident.

Questions/Comments and Reporter Responses

11/10/2017 - Matute, Senobia

Question: Hello, my name is Senobia Matute, I am the new HR Regional Business Partner for Central America. I would be working in your case. I would like to know if your are willing to share with me your contact information so I can call you and discuss this situation.

11/13/2017 - Reporter

Response I'm not at the office right now, but my cell phone is [REDACTED]

01/25/2018 - Matute, Senobia

Comment: HR Investigation was concluded, action taken was the termination of Supervisor Juan Blanco. Thank you for letting us know of this situation.

Info Contributors

None

Participants

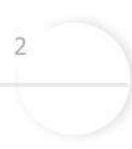
None

Items

Name Description Loss Type Final Outcome Amount Taken Amount Recovered Amount to Recover

Name	Description	Loss Type	Final Outcome	Amount Taken	Amount Recovered	Amount to Recover
Totals:				\$0.00	\$0.00	\$0.00

Crowley/Treminio 000421



Agencies

None

Attachments

None

Synopsis

Outcome of case

Primary outcome:

Substantiated

Action taken:

Termination

Additional details

Tasks

None

Case Notes

11/15/2017 5:09 PM - Matute, Senobia

Today I reached the person that reported the incident. Further information was given. A formal report will be prepared on the case.

Exhibit 6

Date : 11/20/2017 3:11:20 PM

From : "Monroy,Heitzel"

To : "LaMoureaux, Arthur" Arthur.LaMoureaux@crowley.com

Subject : Casos SAL

Attachment : 280.docx;282.docx;283.docx;

Exhibit 7

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

VANESSA TREMINIO,

Plaintiff,

CASE NO.: 3:22-cv-174-MMH-PDB

vs.

CROWLEY MARITIME
CORPORATION, and JUAN
EMILIO BLANCO,

Defendants.

**DEFENDANT CROWLEY MARITIME CORPORATION'S
RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES¹**

Defendant, Crowley Maritime Corporation ("Crowley"), responds to Plaintiff's
First Set of Interrogatories as follows:

INTERROGATORY NO. 1:

Identify all persons who have an ownership interest in Crowley Shared Services,
S.A. de C.V.

RESPONSE:

Produced in response to Plaintiff's First Request for Production is an organizational chart that reflects the current relationship between Crowley Maritime Corporation and Crowley Shared Services, S.A. de C.V. To the extent Plaintiff seeks any additional information, Crowley objects to Interrogatory No. 1

¹ Because Interrogatory Nos. 4, 7, 8 and 9 contain multiple subparts, Plaintiff has served 28 interrogatories on Crowley Maritime Corporation.

remain silent about any such sexual abuse, or any such events or happenings to “Crowley and all entities affiliated therewith.”

RESPONSE:

Crowley objects to Interrogatory No. 4 as improperly containing multiple subparts because the subparts are not “logically or factually subsumed within and necessarily related to the primary question.” Accordingly, Crowley will treat Interrogatory No. 4 as four (4) separate interrogatories. Crowley further objects to Interrogatory No. 4 (and all subparts) to the extent the interrogatory seeks information that is protected by the attorney-client privilege or work product doctrine.

Interrogatory No 4(a): Please state separately the names, addresses, employers, and telephone numbers of any and all persons known to Crowley or to anyone acting on Crowley’s behalf who saw, heard or investigated, or claims to have seen or heard about any of the events or happenings involving the Plaintiff’s allegations of sexual harassment or other sexual misconduct committed by Juan Emilio Blanco in the Crowley office in El Salvador or in Jacksonville.

Excluding Plaintiff and Defendant Blanco, the following individual saw, heard, or investigated claims made by Plaintiff during her employment against Juan Emilio Blanco of sexual harassment or sexual misconduct in the Crowley office in El Salvador or Jacksonville:

- **Arthur LaMoureaux, c/o Alexander DeGance Barnett P.A. Mr. LaMoureaux was aware of Plaintiff’s allegation that she was sexually assaulted by Defendant Blanco during a trip to Jacksonville in November 2017 pursuant to a conversation with Plaintiff in or around December 2017 or January 2018 during which Plaintiff asked Mr. LaMoureaux to keep the allegation confidential and specifically asked him not to disclose the information to Human Resources.**

To the extent Plaintiff seeks additional information, Crowley objects to Interrogatory No. 4(a) as being overly broad because it fails to set forth a time period for the information sought. Crowley has interpreted the interrogatory to mean claims by Plaintiff against Defendant Blanco during her employment. Moreover, in its response, Crowley has not included individuals who may have heard about Plaintiff’s claims years after they allegedly occurred and well after Defendant Blanco’s termination as such information is not relevant to the claims or defenses in this case. Finally, any allegations of sexual harassment or sexual misconduct by Defendant Blanco that purportedly occurred after the alleged

Crowley objects to Interrogatory No. 10 to the extent the interrogatory seeks information that is protected by the attorney-client privilege or work product doctrine. Crowley further objects as the interrogatory fails to set forth a time period and is overly broad to the extent it seeks information regarding individuals who may have heard Plaintiff make allegations against Defendant Blanco years after the alleged events occurred because such information is not relevant to the claims or defenses in this case. **Therefore, from the time of the alleged sexual assault until the time Defendant Blanco was terminated, there is one individual, Arthur LaMoureaux, c/o Alexander DeGance Barnett P.A., who became aware of Plaintiff's allegation that she was sexually assaulted by Defendant Blanco while on a trip to Jacksonville. Plaintiff disclosed this information to Mr. LaMoureaux in or around December 2017 or January 2018 and asked him to keep it confidential and not to disclose it to Human Resources.**

INTERROGATORY NO. 11 (23):

Set forth in detail which allegations in the Amended Complaint Crowley was aware of prior to the service of the Complaint in this lawsuit. State the employee or employees, officers, or directors who were aware of such allegations, the source of their knowledge of the allegations, the allegations of which each such employee, officer, or director was aware, and Crowley's response to such allegations, if any.

RESPONSE:

Crowley objects to Interrogatory No. 11 to the extent the interrogatory seeks information that is protected by the attorney-client privilege or work product doctrine. For instance, prior to the lawsuit being filed, counsel for Plaintiff served a demand letter, which was obviously discussed within Crowley in anticipation of this lawsuit. Crowley further objects as the interrogatory is overly broad and seeks information that is not relevant to the claims or defenses in this case. Specifically, in its response, Crowley has not included individuals who may have heard about Plaintiff's claims years after they allegedly occurred and well after Defendant Blanco's termination as such information is not relevant to the claims or defenses in this case.

Therefore, from the time of the alleged sexual assault until the time Defendant Blanco was terminated, there is one individual, Arthur LaMoureaux,

c/o Alexander DeGance Barnett P.A., who became aware of Plaintiff's allegation that she was sexually assaulted by Defendant Blanco while on a trip to Jacksonville. Plaintiff disclosed this information to Mr. LaMoureaux in or around December 2017 or January 2018 and asked him to keep it confidential and not to disclose it to Human Resources. Mr. LaMoureaux also informed Plaintiff of an investigation Crowley's Human Resources Department was conducting regarding Defendant Blanco.

INTERROGATORY NO. 12 (24):

For Crowley's asserted defenses based on the Plaintiff's conduct (Affirmative Defenses ¶¶ 10, 18, 20), please state with specificity:

- (a) what acts or omissions are the basis thereof; and
- (b) the name, address, place of employment, job title or capacity, and present whereabouts of each person having knowledge or claiming to have knowledge of such conduct on the part of the Plaintiff.

RESPONSE:

Crowley objects to Interrogatory No. 12 to the extent the interrogatory seeks information that is protected by the attorney-client privilege or work product doctrine. Notwithstanding the foregoing objection:

Affirmative Defense No. 10: Crowley is unaware whether Plaintiff has sought and/or obtained alternative employment since her separation from employment with Crowley. Moreover, Plaintiff allegedly suffered from severe emotional distress following the alleged November 9 or 10, 2017 incident with Defendant Blanco but, according to Plaintiff's Amended Complaint, she failed to seek medical treatment following the alleged rape until in or around 2020 when her alleged emotional distress became so severe, Plaintiff claimed that she contemplated suicide.

Affirmative Defense No. 18: Documents relating to Crowley's well-publicized policy and practice prohibiting the conduct alleged by Plaintiff have been produced in response to Plaintiff's First Request for Production. Plaintiff failed to report the alleged sexual harassment and/or sexual assault by Defendant Blanco. Moreover, when Crowley's investigator, Senobia Matute, spoke to Plaintiff as part of Crowley's investigation regarding Defendant Blanco, Plaintiff declined to provide any information regarding her claims. Senobia Matute has knowledge of the

sexual harassment or sexual misconduct by Defendant Blanco that purportedly occurred after the alleged encounter between Plaintiff and Defendant Blanco on November 9 or 10, 2017 are not relevant to Plaintiff's claims or the defenses in this case. Plaintiff alleges sex trafficking (Count II) against Crowley, which requires Crowley to have "knowingly benefitted from participation in the venture." Therefore, allegations of sexual harassment or sexual misconduct occurring after the alleged events in November 2017 are not relevant to the claims or defenses in this matter.

Dated this 15th day of March 2023.

Respectfully submitted,

ALEXANDER DEGANCE BARNETT, P.A.

By: 

Kelly DeGance

Florida Bar No. 0606022

E-mail: kelly.degance@adblegal.com

Samantha Giudici Berdecia

Florida Bar No. 0058667

E-mail: samantha.giudici@adblegal.com

E-mail: mailbox@adblegal.com

1500 Riverside Avenue

Jacksonville, FL 32204

(904) 345-3277 Telephone

(904) 345-3294 Facsimile

*Attorneys for Defendant
Crowley Maritime Corporation*

Exhibit 8

Date : 12/20/2017 10:22:16 PM
From : "Matute, Senobia"
To : "King, Tiffany"
Subject : Ethics Point Case Report
Attachment : El Salvador Trucking Group Shared
Services.docx;image001.jpg;image002.png;image003.png;image004.png;image005.png;image006.png;image007.png;image008.png;image009.png;

For your revision and discussion.

SM



Senobia Matute, Regional
Human Resources Business Partner | Crowley Latin Amrica Services, LLC. Central America
o 504.2551.6548 | m [REDACTED] | d 504.2564.7119
senobia.matute@crowley.com

Ethics Point Investigation Report

Country: El Salvador Shared Services

Trucking Group

On December 12 and 13th I met with Trucking Group Employees reporting to Juan Blanco. I interviewed a total of 12 employees out of 13.

The objective explained to the employees was that this is a common HR practice to meet with employees who occasionally sees, to generate confidence and trust and get to know them better. Confidentiality was guarantee of what they shared during our meeting.

Questions asked

- Seniority at Crowley
- How do you feel in your position and working at Crowley
- What are the things you like the most about your job
- Is there any situation at your job that is a reason of concern
- How is the treatment you receive from your supervisor
- What so you like about Crowley
- Are there any suggestions for us so Crowley can be a better place to work
- Any suggestions for Human Resources Department
- How is the team work among your department?
- Do you feel everyone is treated with equity and justice

After having the one on one meetings these are the subjects that arose in them:

POSITIVE COMMENTS

Crowley is a great company
 Great Benefits
 Educational Assistance Program and Employee Assistance Program is very well received
 Great to have Open Door Policies

OPPORTUNITIES

Recruitment: To give feedback or status on referrals.

HR:

- When temporary employees become permanent employees, HR needs to give follow up on contracts, ID badge, Orientation Chat.
- There is a perception that local HR is not very trustable, that what they report, might not be kept in a confidential matter.
- Karla Lenchoni seems more approachable, she is doing a difference.
- Campaign to keep restrooms clean is needed.

Comments on Area & Supervisor Juan Blanco

- A new employee said that during his training period he had the help and support of his coworkers but that Juan Blanco was not supervising his training and onboarding.
- They feel their workload is a lot; more than what other areas have.
- The communication could be better, there is a sense that not all the information is deployed specially regarding the upcoming tasks and projects. There is a perception that with a couple of people there is more communication than with others.
- They would like to have more feedback and not only during periods of Performance Evaluations.
- They suggest more recognition in their department.
- Comments on Juan Blanco not being very approachable, not with all of his direct reports.
- There is a sense among some (half of the group) that there is favoritism and that not all are treated the same way.
- Female staff reported that Juan Blanco makes inappropriate jokes and sexual comments. They were very explicit on the comments he makes to them. They feel offended and harassed. They have been afraid of losing their jobs. Two mentioned that this was reported to local HR.
- Several people reported that Luis [REDACTED] was bullied by Juan Blanco. Luis was the only person I couldn't talk to since he was on vacation and not reachable. They said that Luis is constantly offended by Juan Blanco's comments.
- Part of the group have the perception that Jose Lopez (Juan Blanco's Supervisor) might be aware of some of the situations, but not of all and they don't feel he will take actions with Juan Blanco since they are very close.
- Employees under PIP process reported that follow up sessions were not done as established in the PIP and that information has been manipulated to make them look as underperformers employees.

Conclusions

1. There is an evident problem with Supervisor Juan Blanco. The comments that female personnel shared, are out of order and don't comply with our Crowley's values and culture.
2. Communication, Feedback and Recognition need to be reinforced among this department.
3. Human Resources have to work hard on the perception that people have on their role and the confidentiality handle by us.
4. Everybody considers Crowley a great place to work.

Recommendations

1. *Immediate actions need to be taken with Juan Emilio Blanco. He does not comply with the values that Crowley promote.*
2. *Evaluate closely the PIP cases submitted to make sure they have been handled objectively.*
3. *Integrate a plan with local HR team to promote more their role and approach with employees.*

Annex 1

Here are some of the literal comments and inappropriate things he has told the employees:

Referring to other co-workers:

- Nicknames of Pornstars, he said: “she looks like a pornstar”
 - He calls Carla Seran “Fuck face”
 - He frequently said on Friday, for all of you is “Viernes de Puterias” – referring to “For you today is Slutty Friday”
 - When one of them was with a sick-leave, when she returned, he said
 - “your illness might be part of a “prohibit illness”
 - Other girl got flowers from her boyfriend and he said: “Prepare your throat for tonight, you have to pay the price of those flowers”
 - When one of them came with a ponytail, he said: “I am sure you like it that way and your boyfriend too, it’s easier to grab you”
 - He also has mentioned that boyfriends like to put their girls on their knees.
-
- He does comments insulting homosexuals and refers to Luis, calling him in a denigrated way. Employees reported this is very constant with Luis.
 - He gave instructions that after being interviewed by me, they had to give him the report on what I asked and the answers they gave.
 - One of the female employees mentioned that JB have made inappropriate comments in front of Jose Lopez, and he only laughs.
 - One of the female employees mentioned that Mario Granada also makes sexual jokes with Juan Blanco.

Exhibit 9

**Case: 297 - Hotline Web
Non-Union Issues
Sexual Harassment**

Case Snapshot

Opened: 01/23/2018
Days open: 1
Last modified: 09/06/2018 9:49 AM
Date closed: 01/25/2018 5:30 PM
Intake method: Hotline Web
Status: Closed
Alert: Green

General Case Info

Case number:
297
Received/Reported date:
01/23/2018
Language:
English
Assigned tier:
Non-Union Issues

Issue
Primary issue:
Sexual Harassment

Case Details [Show Original Case Details](#)

Reported tier information

Case type:
Allegation
Intake method:
Hotline Web

Location

Organization/Building name:
Non-Union Issues
Branch number:
LOGISTICS
Location name:
JAXL
Location/Address:
2061 SCL DRIVE
City:
JACKSONVILLE
State/province:
FL

ZIP/postal code:

32209

Country/Territory:

United States

Reporter contact information

Is the reporter an employee?

Yes

Reporter anonymous:

Yes

Case Information

Crowley Business Unit Where Issue Occurred:

Crowley Logistics

Crowley Department Leading Investigation:

Human Resources

Please identify the person(s) engaged in this behavior:

Juan Emilio Blanco - Supervisor

Do you suspect or know that a supervisor or management is involved?

Do Not Know / Do Not Wish To Disclose

Is management aware of this problem?

Do Not Know / Do Not Wish To Disclose

What is the general nature of this matter?

Juan Emilio Blanco, asked and explicitly said that he as a supervisor could have sex with anyone he wanted and that all supervisors can do that and he asked me for doing that.

Where did this incident or issue/concern occur?

Jacksonville, FL

Please provide the specific or approximate time this incident occurred:

01/12 evening

How long do you think this problem has been going on?

One week

How did you become aware of this issue/concern?

It happened to me

Details:

Before starting to describe my complaint, I would like to express how frustrated I feel at this point. I reported Juan behavior in the past and his behavior has not changed at all since then. I'm extremely close to quit and get another job, 90% sure of doing that and the only 10% that keeps me from doing it is a little hope I have by creating this report and the rest the great company I'm working for. To start, I would like to mention that Juan has not stop doing sexual comments about the girls from our department and the surrounding departments, he keeps calling them by pornstars nick names, sometimes they hear it, sometimes they don't, but this is not really why I'm submitting my report.

I was on a training trip with him and another co-worker in Jacksonville, FL facilities (we left on 01/07 and came back on 01/20). On 01/12 evening, Juan's wife invited us to have dinner and stay (me and our co-worker). After dinner Juan and my co-worker started drinking a lot, while me and Juan's wife were talking. Later during the night our co-worker left to his own bedroom and Juan's wife stood up for a moment and went to a different room, leaving Juan and myself on the table. All of a sudden, he started asking me to show him pictures of myself, which I refused, and he attempted to grab my phone by force. I managed to stop him and then he looked at me and told me that I was really good looking and since he was the supervisor he could have sex (he actually said he could fuck) with whoever he wanted. He told me that I was attractive and he was attractive too and now I knew what a supervisor can do (Is this really what supervisors are allowed to do? do they get this on their manual as part of the benefits of working in this company? or do they get any kind of training on this?), at this point I was in shock and told him that was inappropriate then started talking about my boyfriend to distract him from the topic. After about 10-15min his wife came back and said it was already getting late so I immediately stood up and went to the room they had designated for me, I locked it and as soon as I laid down I started to cry. The next day, he wanted for us to stay at his house again but I refused, he told me that if it was that urgent he could take me to the hotel after midnight (was he looking for an opportunity to do something? part of the things he can also do as a supervisor perhaps?), I stood my ground and managed to have him take my coworker and me back to the hotel.

The only reason why WE (MY CO-WORKER AND I) accepted his wife's invitation to come over to their place is because we understood that as hospitality and like one of ANY of the invitations we got from the rest of the personnel in US (going out at night to eat). I personally never thought he was pretending to make these extremely uncomfortable comments or take this to a worst scenario, I would have NEVER gone there and again, I'm extremely upset about this. I can't believe the stress and anxiety I get just by looking at his face and thinking that he sees me as a sex opportunity or being a potential victim of any other sexual offense, I can't stop crying since I started typing this.

The following week I blocked the event in my head because I wanted no distractions during training. When we came back to El Salvador I still had not processed what had happen until today that I saw him at work. I seriously can't work with a sex offender and even worst having him as my supervisor. I really hope to ring some bells and get a resolution to this problem before I find another job and lose that 10% of hope and trust I still have in this company. I really love my job and I really like what I'm doing, I like the company and I do believe that this is a place where I can grow and make a career in (I have even make sacrifices to work here, such as not taking school due to schedules) but there is no way that I share every day with a sexual offender.

Follow-ups

Reporter Additional Information

01/23/2018 - Reporter

The caller provided the following additional information:

The caller would like to have the issues treated with urgency.

01/25/2018 - Reporter

Tiffany, I just tried to call you from [REDACTED] but I got your voice mail once again. Please feel free to contact me on that number or on my cell phone. Thank you.

Questions/Comments and Reporter Responses

01/23/2018 - King, Tiffany

Question: Thank you for bringing your concerns to our attention.

Senobia Matute, Regional HR Business Partner is aware of the employee concerns related to Juan Blanco and is currently investigating. Can you provide your name and contact information? I would like you to share your concerns with Senobia. I'm also available to discuss your concerns and can be reached at (904) 727-2297. Tiffany King, HR Director.

01/23/2018 - Reporter

Response Thank you for replying back to me. I tried to call you right now because this is really taking control over me, I feel really upset and desperate. Please call me at [REDACTED], I am from El Salvador so country code is 503 and full number would be (503) [REDACTED]. Please call me tomorrow since I took a sedative because I had not been able to calm down since I came home and I don't think I will be awake for much longer. My name is [REDACTED].

01/24/2018 - King, Tiffany

Comment: [REDACTED], I have tried to contact you at the number provided, however, I have been unsuccessful. Please call my cell at [REDACTED]. Thank you, Tiffany King, HR Director.

01/24/2018 - Reporter

Reply I tried to call you as well but I just could reach your voice mail, so I left you a message. Please feel free to call me.

01/24/2018 - King, Tiffany

Comment: [REDACTED], are you available for a call now? If so, please call my cell at [REDACTED] I will be available until 7pm today or feel free to call me tomorrow morning. Thank you, Tiffany King, HR Director.

01/24/2018 - Reporter

Reply Tiffany, I apologize, I just saw your message. I've just tried to call you (6 PM my time) and left you a voice mail but I think you have already left your office. I will give you a call tomorrow morning or feel free to contact me as well.

01/25/2018 - King, Tiffany

Comment: Conversation conducted with reporter, advised Juan Blanco was the subject of other cases and an investigation w. ² recently completed by the HR team resulting in his termination. I shared my appreciation for speaking up and informed the reporter she can contact me in the future. Investigation closed.

Info Contributors

None

Participants

Name	Job Title	Relationship	Role	Results	Notes
Juan Emilio Blanco	Supervisor	None	None	None	

Items

Name	Description	Loss Type	Final Outcome	Amount Taken	Amount Recovered	Amount to Recover
Totals:				\$0.00	\$0.00	\$0.00

Agencies

None

Attachments

None

Synopsis

Outcome of case

Primary outcome:

Substantiated

Action taken:

Termination

Additional details

Tasks

None

Case Notes

None

Exhibit 10

Date : 1/23/2018 7:39:34 PM

From : "King, Tiffany"

To : "Matute, Senobia (Senobia.Matute@crowley.com)" Senobia.Matute@crowley.com

Subject : FW: New Case (#297) - Sexual Harassment

This is a new Ethics Point complaint about Juan Blanco.

Has Jose confirmed his availability to travel to El Salvador next week? If not, I would like to proceed with the termination this week and Jose can participate by phone.

We can't afford to have another complaint about Juan. It appears that we aren't taking the employee complaints serious.

Can we discuss our plan tomorrow morning? If needed, I will get Bob Weist involved to expedite this.

Thanks.

-----Original Message-----

From: EthicsPoint [<mailto:noreply@navexglobal.com>]

Sent: Tuesday, January 23, 2018 7:30 PM

To: King, Tiffany <Tiffany.King@crowley.com>

Subject: New Case (#297) - Sexual Harassment

THIS IS AN AUTOMATED MESSAGE FROM ETHICSPPOINT DISPATCH - PLEASE DO NOT REPLY

This is to notify you that a new case has been submitted: 297 for Non-Union Issues

You should proceed to <https://crowleymaritimecorp.ethicspointvp.com/case.aspx?caseId=314> and enter your user name and password.

If you are using a handheld device please proceed to <https://crowleymaritimecorp.ethicspointvp.com/mobile/>

This is a system-generated email. If you would like to be unsubscribed, please contact your administrator.

NAVEX Global reference: 0b280b00-f2bc-4af1-a146-fa7055283f7a

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Exhibit 11

Date : 1/24/2018 10:46:51 AM
From : "EthicsPoint" noreply@navexglobal.com
To : "Monroy,Heitzel" Heitzel.Monroy@crowley.com
Subject : Juan Blanco Termination

THIS IS AN AUTOMATED MESSAGE - PLEASE DO NOT REPLY

Message from King, Tiffany regarding case 297 for Non-Union Issues:

Senobia and I met this morning to discuss the immediate termination of Juan Blanco. Jacqueline Najera will conduct the termination discussion with Jose Lopez and Senobia on a conference call. The termination conversation will take place at 3:00pm today in El Salvador. I will contact the reporter once the termination discussion is completed.

King, Tiffany (Primary)

You should proceed to <https://crowleymaritimecorp.ethicspointvp.com/case.aspx?caseId=314> and enter your user name and password.

If you are using a handheld device please proceed to <https://crowleymaritimecorp.ethicspointvp.com/mobile/>

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