

**IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND  
FOR  
PALM BEACH COUNTY, FLORIDA**

**RAYANE THIBODEAU**

**Plaintiff,**

vs.

**CASE NO.:**

**CHANEL, INC.,**

**Defendant.**

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**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff, Rayane Thibodeau (“Plaintiff”), sues Defendant, Chanel, Inc. (“Defendant”), and alleges:

**PARTIES, JURISDICTION, AND CONDITIONS PRECEDENT**

1. Plaintiff is a resident of Palm Beach County, Florida.
2. Defendant, Chanel, Inc., is a foreign corporation doing business in the State of Florida and is an “employer” within the meaning of the Florida Civil Rights Act (“FCRA”), § 760.01, et seq., Fla. Stat.
3. At all times material, Defendant employed more than fifteen (15) employees.
4. All conditions precedent to bringing this action have been satisfied, performed, or have occurred, including the filing of a charge of discrimination.

## GENERAL ALLEGATIONS

5. Plaintiff began employment with Defendant in or about August 2020 as an Assistant Manager.
6. Plaintiff was qualified for her position and performed her job duties satisfactorily.

### Sexual Harassment and Protected Activity

7. Beginning in or about November 2020, Plaintiff was subjected to repeated and unwelcome sexual harassment by her supervisor, Paul Rados.
8. The harassment included:
  - a) Inappropriate comments, including referring to Plaintiff as “attractive” and “sunshine”;
  - b) Unwelcome physical contact, including shoulder massages.
9. Plaintiff reported the harassment to Human Resources in or about August 2021.
10. Plaintiff’s complaint constituted protected activity under the FCRA.

### Retaliatory Conduct and Termination

11. Following Plaintiff’s complaint, Defendant terminated Mr. Rados.
12. However, Defendant also suspended Plaintiff, citing alleged conduct involving removal of a security camera at Mr. Rados’ direction.
13. During her suspension, Plaintiff sought to continue her employment by applying for a transfer to another Chanel location.
14. Before Plaintiff could complete or meaningfully pursue the transfer process, Defendant terminated her employment on or about September 20, 2021.

## Post-Termination Application and Failure to Hire

15. After her termination, Plaintiff remained interested in employment with Defendant.

16. Plaintiff became aware of an open position with Defendant for which she was qualified.

17. Plaintiff applied for the position and received confirmation that Defendant received her application.

18. Despite her qualifications and prior experience with Defendant, Plaintiff was:

- a. Not contacted for an interview;
- b. Not given any meaningful consideration;
- c. Not hired.

19. Defendant's failure to interview and hire Plaintiff occurred after and because of:

- a. Plaintiff's prior complaint of sexual harassment; and
- b. Plaintiff's opposition to unlawful employment practices.

20. Defendant had knowledge of Plaintiff's prior protected activity at the time it failed to interview and hire her.

21. The temporal proximity between Plaintiff's protected activity, termination, and subsequent application—and Defendant's refusal to interview or hire her—demonstrates a causal connection.

Disparate Treatment

22. Plaintiff is a member of protected classes based on her sex and sexual orientation.
23. Plaintiff was treated less favorably than similarly situated applicants who did not engage in protected activity.
24. Defendant's stated or anticipated reasons for failing to hire Plaintiff are pretextual.

COUNT I – RETALIATION (FAILURE TO INTERVIEW AND HIRE)  
(FCRA)

25. Plaintiff realleges paragraphs 1–24.
26. Plaintiff engaged in statutorily protected activity by reporting sexual harassment.
27. Plaintiff applied for a position with Defendant for which she was qualified.
28. Defendant took materially adverse action by failing to:
  - a. Interview Plaintiff;
  - b. Consider Plaintiff;
  - c. Hire Plaintiff.
29. There is a causal connection between Plaintiff's protected activity and Defendant's failure to interview and hire her.
30. Defendant's actions would dissuade a reasonable person from engaging in protected activity.
31. Defendant's conduct constitutes unlawful retaliation in violation of the FCRA.

COUNT II – DISCRIMINATION (SEX AND SEXUAL ORIENTATION)

(FCRA)

32. Plaintiff realleges paragraphs 1–24.

33. Plaintiff is a member of protected classes based on her sex and sexual orientation.

34. Plaintiff was qualified for the position for which she applied.

35. Defendant failed to hire Plaintiff under circumstances giving rise to an inference of discrimination.

36. Similarly situated individuals outside Plaintiff's protected classes were treated more favorably.

37. Defendant's actions were motivated by unlawful discrimination.

DAMAGES

38. As a result of Defendant's unlawful conduct, Plaintiff has suffered damages including:

- a) Loss of earnings and earning capacity;
- b) Loss of employment opportunities;
- c) Emotional distress, humiliation, and mental anguish;
- d) Other compensatory damages.

39. Plaintiff is entitled to all relief available under § 760.11, Fla. Stat., including:

- a) Back pay and front pay;
- b) Compensatory damages;

- c) Attorney's fees and costs;
- d) Pre- and post-judgment interest;
- e) Injunctive and equitable relief.

VI. DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury on all issues so triable.

WHEREFORE, Plaintiff requests judgment against Defendant for damages, attorney's fees, costs, and such further relief as the Court deems just and proper.

Dated: April 6, 2026

Respectfully submitted,

*/s/ Anthony M.  
Georges-Pierre*

Anthony M. Georges-Pierre, Esq.

Fla. Bar No.: 0533637

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