

UNSWORN DECLARATION

I declare under the penalty of perjury that the following is true and correct:

1. My name is Laquisha Ward. I am over the age of twenty-one and I am competent to make this declaration.

2. My date of birth is 04/28/1998, and my address is 7322 Southwest Freeway #2068, Houston, Texas 77074.

3. I am an employee of She's Happy Hair Inc. as a sales specialist and I work at the store located at 3280 South Loop West ("**South Store**"). All of the statements contained herein are within my personal knowledge and are true and correct.

4. Marcus Bowers has repeatedly come into the South Store recording team members using his personal social media and Meta smart glasses. These recordings often occur without notice and involve staff in situations beyond our control and outside of our job responsibilities. Marcus Bowers has also asked employees for store keys and has shared internal company matters with paying customers, including personal and business issues occurring behind the scenes between himself and Warren Broadnax. These actions have caused disruption in the South Store and discomfort among both employees and customers.

5. As the sales specialist at the South Store, several team members have expressed that they feel uncomfortable and intimidated by these interactions. There is concern that Marcus Bowers' anger toward Warren Broadnax could be taken out on store employees, creating fear of retaliation, or job loss, despite the team having no involvement in leadership matters.

6. In contrast, the owner Warren Broadnax, has consistently created a safe, supportive, and professional work environment for both myself and my team. I have been an employee at She's Happy Hair for nearly three years, and throughout that time, Warren Broadnax has supported my growth, including backing my participation in management training and ensuring job security during times when I needed to take time off due to personal family matters. Warren Broadnax remains accessible, responsive, and actively involved in addressing in-house concerns, and Warren Broadnax consistently stands behind the team.

7. Warren Broadnax represents professionalism and leadership in a way that fosters stability and confidence within the workplace, whereas Marcus Bowers' behavior has caused disruption and discomfort for the team. This statement is shared to document these concerns and to advocate for a respectful, professional, and safe working environment for all employees.

Executed in Harris County, Texas on January 7, 2026.


LaQuisha Ward (Jan 6, 2026 18:12:28 CST)
Laquisha Ward

