

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

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LOLA-LOLITA OREL,

Plaintiff,

- against -

INFINITY LASER SPA INC., SPEKTRUM LASER  
SPA INC. and SAM RAKHMINOV (individually),

Defendants.  
-----x

Case No.

**COMPLAINT**

**PLAINTIFF DEMANDS  
A TRIAL BY JURY**

LOLA-LOLITA OREL (“Plaintiff”), by and through her attorneys, PHILLIPS & ASSOCIATES, PLLC, against INFINITY LASER SPA INC., SPEKTRUM LASER SPA INC. and SAM RAKHMINOV (collectively “Defendants”), alleges upon knowledge as to herself and her own actions and upon information and belief as to all other matters, as follows:

**NATURE OF THE CASE**

1. Plaintiff complains pursuant to the discrimination provisions of (i) **Title VII of the Civil Rights Act of 1964**, as amended, 42 U.S.C. § 2000e, et. seq. (“Title VII”); (ii) the **New York State Human Rights Law**, New York State Executive Law, § 296 et seq. (“NYSHRL”); and (iii) the **New York City Human Rights Law**, the New York City Administrative Code § 8-107(1), et. seq. (“NYCHRL”), the **New York Labor Law** (“NYLL”) § 198(3) and asserts civil claims of (iv) battery; as well as any other claim(s) that can be inferred from the facts set forth herein, Plaintiff seeks damages to redress the injuries Plaintiff has suffered as a result of having been discriminated against by Defendants on the basis of Plaintiff’s sex/gender (female) and religion (Christian Orthodox) by way of harassment and Defendant’s failure to pay wages.

**JURISDICTION AND VENUE**

2. Jurisdiction of this Court is proper under 42 U.S.C. §2000e-5(f)(3) and 28 U.S.C. §§ 1331 and 1343.
3. The Court has supplemental jurisdiction over Plaintiff's state and county claims pursuant to 28 U.S.C. §1367.
4. Venue is proper in this district in that the events or omissions giving rise to the claims occurred within the Southern District of New York. 28 U.S.C. § 1391(b).

**PROCEDURAL PREREQUISITES**

5. Plaintiff timely filed a charge, upon which this Complaint is based, with the United States Equal Employment Opportunity Commission ("EEOC").
6. Plaintiff received a Notice of Right to Sue from the EEOC dated July 18, 2024, with respect to the instant charges of discrimination. A copy of the Notice is annexed to this Complaint.
7. This action is being commenced within 90 days of receipt of the Notice of Right to Sue.

**PARTIES**

8. At all times material, Plaintiff is a female and a resident of the State of New York.
9. At all times material, Plaintiff was and is a "person" and an "employee" of Defendants and entitled to protection as defined by TITLE VII, the NYSHRL, and the NYCHRL.
10. At all times material, Defendants Infinity Laser Spa Inc. and Spektrum Laser Spa Inc. (collectively the "Spas") are domestic business corporations with headquarters locating in New York, New York.
11. At all times material, the Spas were wholly owned by Defendant Sam Rakhminov ("Rakhminov").

12. At all times material, Plaintiff worked at either Infinity Laser Spa Inc. located at 866 6<sup>th</sup> Avenue, New York, NY 10001, or at Spektrum Laser Spa Inc., located at 1011 Avenue of the Americas New York, New York 10018.
13. Upon information and belief, as of January 1, 2023, Spektrum Laser Spa has merged with Infinity Laser Spa.
14. At all times material, Plaintiff worked under the ultimate supervision of Rakhminov.
15. At all times material, Plaintiff was employed by Defendants.
16. At all times material, Defendants employed at least 15 employees.
17. At all times material, each of the Spas was an “employer” for purposes of Title VII, NYSHRL, NYCHRL, and NYLL.

#### **MATERIAL FACTS**

18. On or about August 7, 2022, Plaintiff began working for the Spas as a Laser Technician, earning \$100 for a 10 ½ hour day, tips, and a 10% commission on the sales of packages.
19. At all times material, Plaintiff worked primarily at Infinity but worked at Spektrum a few times.
20. As a Laser Technician, Plaintiff required an Esthetician License from the State of New York. Plaintiff’s duties and responsibilities included but were not limited to operating laser hair removal machines, customer service, and disinfecting the rooms and supplies, cleaning the office after hours.
21. At all times material, Plaintiff was qualified for her position.
22. At all times material, Plaintiff worked under the supervision of Defendant Rakhminov.
23. Throughout Plaintiff’s employment with Defendant, Plaintiff was an exemplary employee with no write ups or disciplinary actions.
24. Indeed, Plaintiff regularly generated substantial sales, exceeding \$2500 - \$4500 on most days.

25. On or around Plaintiff's second week of employment, Defendant Rakhminov initiated a campaign of severe and pervasive sexual harassment against Plaintiff far beyond petty slights or trivial inconveniences.
26. Throughout everyday of Plaintiff's employment, Defendant Rakhminov questioned why Plaintiff's laser treatments took longer than he deemed necessary and asked if Plaintiff was giving clients "happy endings," referring to sexual favors.
27. Plaintiff was shocked that Defendant Rakhminov had asked her this, however, Plaintiff felt unable to complaint or object due to Defendant Raskhminov's status of owner of the Spas.
28. In other words, Defendant Rakhminov's ownership position made it such that complaining of harassment would be futile. In fact, because he had the authority to fire employees, Plaintiff feared she would be retaliated against should she engage in protected activity.
29. In the week that followed, Defendant Rakhminov continued to create a hostile work environment by constantly yelling at Plaintiff for not cleaning up the room after a treatment fast enough, which involved the time-consuming process of changing the paper on the table and disinfecting the laser machine and the table. Specifically, Rakhminov often called Plaintiff a slob, stating "I bet you're a dirty slob at home."
30. On or about October 2022, Rakhminov made Plaintiff move furniture in her office and scrub the wall behind the furniture for a half hour (not remotely within her job responsibilities), causing her to miss client visits for which she would have been paid.
31. Additionally, Plaintiff was regularly required to stay after her appointments were complete and told to sweep and mop the entire office as well as collect and take out the trash), often resulting in 11-hour workdays.

32. On or around August 21, 2022, Plaintiff engaged in protected activity and advised Defendant Rakhminov she was diagnosed with Hashimoto's disease, an inflammation of her thyroid. Defendant Rakhminov, responded "why are you telling me about all your problems. We all have problems. No one cares."
33. Immediately after disclosing her disease, Defendant Rakhminov repeatedly made derogatory comments to Plaintiff about her appearance and body. Specifically, Defendant Rakhminov often told Plaintiff she had a "fat ass" and called her a "plus-size Barbie." Additionally, Defendant Rakhminov continually told Plaintiff to lose weight and suggested taking a steroid to do so.
34. As a result of this incessant harassment, Plaintiff tried taking this steroid to lose weight., which made her violently ill.
35. Throughout Plaintiff's employment, Defendant Rakhminov regularly subjected Plaintiff to sexual harassment, by way of suggesting sexual acts and discussing explicit details of his own alleged sexual encounters.
36. As such, Defendant Rakhminov forced Plaintiff to look at explicit photos of other employees who worked at strip clubs and bragged about engaging in threesomes with some of Plaintiff's coworkers.
37. In fact, Plaintiff's coworker admitted she walked into Defendant Rakhminov watching pornographic movies in his office.
38. Additionally, Defendant Rakhminov frequently touched Plaintiff's arms, held her hand and played with her hair. Plaintiff immediately refused his advances.
39. Throughout her tenure, Plaintiff realized she was not being paid equally as compared to her counterparts who were sexually involved with Defendant Rakhminov.

40. Specifically, on or around October 2022, Plaintiff learned other Laser Technicians, who were sexually involved with Defendant Rakhminov were being paid \$300 per day.
41. Additionally, Plaintiff learned that Defendants had only been paying her 8% commission on package sales, not 10%.
42. Further, Plaintiff advised Defendant Rakhminov that she was behind on some bills and asked if she could work more days. In response, he *reduced* her work schedule to one-day per week.
43. Subsequently, on or about November 2022, Defendant Rakhminov furthered his campaign and discriminated against Plaintiff based on her religion.
44. Specifically, Defendant Rakhminov feigned ripping off Plaintiff's cross necklace, while yelling "take that shit off," and told Plaintiff was a "jew" and not a real Christian. Rakhminov criticized Plaintiff's baptism rituals, asserting Christianity is not a real religion and asked Plaintiff if they beat her with a cross during her baptism.
45. Plaintiff was shocked, humiliated, and offended by Defendant Rakhminov's conduct.
46. When Plaintiff inquired as to why Defendant Rakhminov reduced her days, he responded that if Plaintiff wanted to work more days, she would have to "earn them.". Plaintiff understood this as a sexually suggestive invitation to sleep with Defendant Rakhminov.
47. Plaintiff expressed that this conversation was unwanted and unwelcome.
48. On or about November 9, 2022, Plaintiff notified Defendant Rakhminov prior to her shift, that she had a 104-degree temperature, had tested positive for COVID and would be unable to come to work.
49. Defendant Rakhminov threatened Plaintiff by stating if she didn't come to work, she would be fired. Despite Plaintiff's COVID diagnosis, Defendant Rakhminov forced Plaintiff to come to work.

50. At the end of Plaintiff's shift, Plaintiff texted Defendant Rakhminov inquiring if she can stay home the next day since her symptoms worsened. He never responded.
51. On or around November 24, 2022, Plaintiff discovered she was pregnant.
52. Consequently, a week later, Plaintiff confronted Defendant Rakhminov regarding the pay discrepancy. Defendant Rakhminov shrugged his shoulders, said "so what?".
53. Defendant Rakhminov also withheld portions of Plaintiff's tips, by logging into the system to take Plaintiff's credit card tips and give them to other coworkers.
54. Ultimately on or around December 1, 2022, Defendant Rakhminov terminated Plaintiff's employment in retaliation for denying his sexual advances and complaining about her lack of proper pay. Defendant Rakhminov told Plaintiff that she is a "big girl" and she would be eligible for rehire if she "earned" more days, referring again to a sexual proposition.
55. On December 24, 2023, Plaintiff suffered a miscarriage due to her termination and hostile work environment.
56. Indeed, Plaintiff asked Defendant Rakhminov for her esthetician license back. However, Defendant Rakhminov refused to return it and claimed he lost it.
57. Instead of returning Plaintiff's esthetician license, Defendant Rakhminov refused to turn it over to Plaintiff, which adversely affected Plaintiff's ability to find a new job.
58. Finally, on or around February 24, 2023, about three months after Plaintiff was fired, Defendant Rakhminov returned her license.
59. As a result of Defendants' actions, Plaintiff feels extremely humiliated, degraded, victimized, embarrassed, traumatized and emotionally distressed.
60. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer the loss of income, benefits, and other compensation which she was entitled to receive

as a result of her employment by Defendants. Plaintiff will also suffer future pecuniary losses, emotional pain, suffering, inconvenience, loss of enjoyment of life, physical distress and other non-pecuniary harm.

**FIRST CAUSE OF ACTION  
FOR DISCRIMINATION UNDER TITLE VII  
(against All Defendants)**

61. Plaintiff repeats and realleges each and every allegation in Paragraphs one through fifty-five, *supra*.

42 U.S.C. § 2000e-2(a)(1) states, in part: It shall be an unlawful employment practice for an employer to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to their compensation, terms, conditions, or privileges of employment, because of such individual's race, color, *religion*, *sex*, or national origin.

(emphasis added).

62. As described herein, the Spas, through their owner, Rakhminov, engaged in unlawful employment practices prohibited by Title VII, by discriminating against Plaintiff on the basis of her sex and gender (female) and her religion (Orthodox Christianity) by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment that included, among other things, discriminatory and disparate treatment of Plaintiff by way of sexual harassment and religious harassment.
63. The Spas, through their owner, Rakhminov, engaged in a pattern of severe and pervasive harassment against Plaintiff on the basis of her sex/gender (female) as evidenced by Rakhminov paying those of Plaintiff's coworkers that slept with him three times as much as he paid her; suggestively inquiring of Plaintiff if the length of her treatments was because she was giving clients "happy endings," referring to sexual favors; repeatedly made derogatory comments to Plaintiff about her appearance and inappropriate comments about her body, such as "fat ass" and



“plus-size Barbie;” regularly subjecting her to other forms of sexual harassment, including suggesting sexual acts and discussing explicit details of his own alleged sexual encounters; forcing Plaintiff to look at explicit photos of other employees who worked at strip clubs and bragging about engaging in threesomes with her coworkers; going beyond verbal sexual harassment, and also subjecting Plaintiff to physical sexual harassment, by touching her arms, holding her hand and playing with her hair, all against her will; and by ultimately firing her.

64. The Spas, through their owner, Rakhminov, also engaged in a pattern of severe and pervasive harassment against Plaintiff on the basis of her religion, as evidenced by his regularly insulting and ridiculing Plaintiff’s Orthodox Christian religion; pretending to rip off Plaintiff’s cross necklace, while shouting “take that shit off;” yelling at Plaintiff that she was a “jew” and not a real Christian; by slandering her baptism rituals and saying that Christianity is not a real religion; by asking Plaintiff if they beat her with a cross during her baptism; and by specifically and deliberately firing Plaintiff a mere two days before Christmas.
65. As a result of Defendants’ unlawful discriminatory conduct in violation of Title VII, Plaintiff has suffered, and continues to suffer, economic loss, for which she is entitled to an award of monetary damages, as well as other relief.
66. As a result of the unlawful discriminatory conduct of the Defendants in violation of Title VII, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages, as well as other relief.

67. The unlawful discriminatory actions of Defendants constitute malicious, willful, and wanton violations of Title VII, for which Plaintiff is entitled to the maximum allowable damages under this statute and an award of punitive damages.

**SECOND CAUSE OF ACTION  
FOR DISCRIMINATION UNDER THE NYSHRL  
(against All Defendants)**

68. Plaintiff repeats and realleges each and every allegation in Paragraphs one through sixty-three, *supra*.

69. New York State Executive Law §296(1) provides that:

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

70. Under New York State law, sexual harassment does not need to be "severe or pervasive" before it is unlawful. A single incident can be sufficient. Harassment is unlawful if it is anything more than what a "reasonable victim of discrimination would consider petty slights or trivial inconveniences." As described above, Defendants' actions and harassment went far beyond "petty slights or trivial inconveniences."

71. The Spas, through their owner, engaged in unlawful employment practices prohibited by the NYSHRL, by discriminating against Plaintiff on the basis of her sex and gender (female) by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment that included, among other things, discriminatory and disparate treatment of Plaintiff by way of sexual harassment.

72. The Spas, through their owner, engaged in a pattern of ongoing harassment against Plaintiff on the basis of her sex/gender (female) as evidenced by Rakhminov paying those of Plaintiff's coworkers that slept with him three times as much as he paid her; suggestively inquiring of Plaintiff if the length of her treatments was because she was giving clients "happy endings," referring to sexual favors; repeatedly made derogatory comments to Plaintiff about her appearance and inappropriate comments about her body, such as "fat ass" and "plus-size Barbie;" regularly subjecting her to other forms of sexual harassment, including suggesting sexual acts and discussing explicit details of his own alleged sexual encounters; forcing Plaintiff to look at explicit photos of other employees who worked at strip clubs and bragging about engaging in threesomes with Plaintiff's coworkers; going beyond verbal sexual harassment, and also subjecting Plaintiff to physical sexual harassment, by touching her arms, holding her hand and playing with her hair, all against her will; and by ultimately firing her.
73. The Spas, through their owner, also engaged in unlawful employment practices prohibited by the NYSHRL, by discriminating against Plaintiff on the basis of her Orthodox Christian religion by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment that included, among other things, discriminatory and disparate treatment of Plaintiff by way of religious harassment.
74. The Spas, through their owner, engaged in a pattern of ongoing harassment against Plaintiff on the basis of Orthodox Christian religion as evidenced by his regularly insulting and ridiculing Plaintiff's Orthodox Christian practices; pretending to rip off Plaintiff's cross necklace, while shouting "take that shit off;" yelling at Plaintiff that she was a "jew" and not a real Christian; by slandering her baptism rituals and saying that Christianity is not a real religion;

by asking Plaintiff if they beat her with a cross during her baptism; and by specifically and deliberately firing Plaintiff a mere two days before Christmas.

75. As a result of Defendants' unlawful discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, economic loss, for which she is entitled to an award of monetary damages and other relief.
76. As a result of the unlawful discriminatory conduct of the Defendants in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages, as well as other relief.
77. The unlawful discriminatory actions of Defendants constitute malicious, willful, and wanton violations of the NYSHRL, for which Plaintiff is entitled to the maximum allowable damages under this statute and an award of punitive damages.

**THIRD CAUSE OF ACTION  
FOR DISCRIMINATION UNDER THE NYCHRL  
(against All Defendants)**

78. Plaintiff repeats and realleges each and every allegation in Paragraphs one through seventy-four *supra*.
79. New York City Administrative Code §8-107 provides that it shall be an unlawful discriminatory practice:

For an employer or an employee or agent thereof, because of the actual or perceived age, race, creed, color, national origin, *gender*, disability, marital status, partnership status, caregiver status, sexual and reproductive health decisions, sexual orientation, uniformed service or immigration or citizenship status of any person, , to refuse to hire or employ or to bar or to discharge from employment such person or to discriminate against such person in compensation or in terms, conditions, or privileges of employment.

80. Under New York City law, sexual harassment does not need to be “severe or pervasive” before it is unlawful. A single incident can be sufficient. Harassment is unlawful if it is anything more than what a “reasonable victim of discrimination would consider petty slights or trivial inconveniences.”
81. As described above, Defendants’ actions and harassment went far beyond “petty slights or trivial inconveniences.” As described herein, Defendants engaged in unlawful employment practices prohibited by NYCHRL, by discriminating against Plaintiff on the basis of her sex and gender (female) by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment that included, among other things, discriminatory and disparate treatment of Plaintiff by way of sexual harassment.
82. The Spas, through their owner, engaged in unlawful employment practices prohibited by the NYCHRL, by discriminating against Plaintiff on the basis of her sex and gender (female) by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment that included, among other things, discriminatory and disparate treatment of Plaintiff by way of sexual harassment.
83. The Spas, through their owner, engaged in a pattern of ongoing harassment against Plaintiff on the basis of her sex/gender (female) as evidenced by Rakhminov paying those of Plaintiff’s coworkers that slept with him three times as much as he paid her; suggestively inquiring of Plaintiff if the length of her treatments was because she was giving clients “happy endings,” referring to sexual favors; repeatedly made derogatory comments to Plaintiff about her appearance and inappropriate comments about her body, such as “fat ass” and “plus-size Barbie;” regularly subjecting her to other forms of sexual harassment, including suggesting sexual acts and discussing explicit details of his own alleged sexual encounters; forcing Plaintiff to look at

explicit photos of other employees who worked at strip clubs and bragging about engaging in threesomes with her coworkers; going beyond verbal sexual harassment, and also subjecting Plaintiff to physical sexual harassment, by touching her arms, holding her hand and playing with her hair, all against her will; and by ultimately firing her.

84. The Spas, through their owner, also engaged in unlawful employment practices prohibited by the NYCHRL, by discriminating against Plaintiff on the basis of her Orthodox Christian religion by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment that included, among other things, discriminatory and disparate treatment of Plaintiff by way of religious harassment.
85. The Spas, through their owner, engaged in a pattern of ongoing harassment against Plaintiff on the basis of her Orthodox Christian religion as evidenced by Rakhminov regularly insulting and ridiculing Plaintiff's Orthodox Christian practices; pretending to rip off Plaintiff's cross necklace, while shouting "take that shit off;" yelling at Plaintiff that she was a "jew" and not a real Christian; by slandering her baptism rituals and saying that Christianity is not a real religion; by asking Plaintiff if they beat her with a cross during her baptism; and by specifically and by deliberately firing Plaintiff a mere two days before Christmas.
86. As a result of Defendants' unlawful discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, economic loss, for which she is entitled to an award of monetary damages and other relief.
87. As a result of the unlawful discriminatory conduct of the Defendants in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to depression, humiliation, embarrassment, stress and anxiety,

loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages, as well as other relief.

88. The unlawful discriminatory actions of Defendants constitute malicious, willful, and wanton violations of the NYCHRL, for which Plaintiff is entitled to the maximum allowable damages under this statute and an award of punitive damages.

**FOURTH CAUSE OF ACTION  
FOR CIVIL BATTERY  
(Individually)**

89. Plaintiff repeats and realleges each and every allegation in paragraphs one through seventy-five.
90. A claim of civil battery is defined as intentional and unjustified touching of another person, without that person's consent, with the intent to cause a bodily contact that a reasonable person would find offensive.
91. Defendant Rakhminov intentionally touched Plaintiff, without her consent, with the intent to cause bodily contact, by touching Plaintiff without her consent, and against her will. This egregious conduct would be offensive to any reasonable person.
92. As a result of Defendant Chan's unlawful conduct, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which she is entitled to an award of monetary damages and other relief.
93. Plaintiff is entitled to the maximum amount allowed under this statute/law.

**FIFTH CAUSE OF ACTION  
FOR THE FAILURE TO PAY WAGES UNDER NYLL**

94. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

95. NYLL § 193(1)(b) provides that:

“All employers are prohibited from effectuating a wide range of “deductions” from its employees’ wages unless expressly authorized, in writing, by the employee and are for the benefit of the employee, provided that such authorization is *voluntarily* and only given following receipt by the employee of written notice of all terms and conditions of the payment and/or its benefits and the details of the manner in which deductions will be made. NYLL § 193(1)(b) (emphasis added).

96. Plaintiff was an employee of Defendant within the meaning of NYLL § 193(1)(b).

97. Defendant is an employer within the meaning of NYLL § 190(3).

98. Plaintiff’s unpaid wages constitute wages within the meaning of NYLL § 193(1).

99. Throughout Plaintiff’s tenure, Defendant did not pay Plaintiff the 10% commission that was agreed upon, instead paying 8% in commission. Additionally, Defendant would pay out Plaintiff’s tips to other coworkers.

100. As a result of Defendant’s failure to pay Plaintiff his earned wages, Defendant violated the NYLL.

101. Defendant willfully violated the NYLL by knowingly and intentionally failing to pay Plaintiff his earned wages.

102. Due to Defendant’s willful violations of the NYLL, Plaintiff is entitled to recover from Defendant the total amount of his unpaid wages in accordance with the parties’ agreed terms of employment, liquidated damages, attorneys’ fees, costs, disbursements, pre-judgment interest, and post-judgment interest.

**JURY DEMAND**

103. Plaintiff requests a jury trial on all issues to be tried.

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



- A. Declaring that Defendants engaged in unlawful employment practices prohibited by Title VII, the NYSHRL, and the NYCHRL, in that Defendants discriminated against Plaintiff on the basis of sex by way of sexual harassment and thereby created and maintained a hostile work environment;
- B. Declaring that Defendants engaged in unlawful employment practices prohibited by Title VII, the NYSHRL, and the NYCHRL, in that Defendants discriminated against Plaintiff on the basis of religion by way of religious harassment and thereby created and maintained a hostile work environment;
- C. Declaring that Defendants have damaged Plaintiff in an amount that exceeds the jurisdictional threshold of this Court;
- D. Awarding damages to Plaintiff for all lost wages, commissions, tips, and benefits resulting from Defendants' unlawful discrimination, and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices;
- E. Awarding Plaintiff compensatory damages for mental, emotional injury, distress, pain and suffering and injury to her reputation in an amount to be proven;
- F. Awarding Plaintiff punitive damages;
- G. Awarding Plaintiff attorneys' fees, costs, disbursements, and expenses incurred in the prosecution of the action, along with prejudgment interest; and
- H. Awarding Plaintiff such other and further relief as the Court may deem equitable, just and proper to remedy Defendants' unlawful conduct.

Dated: Garden City, New York  
August 9, 2024

PHILLIPS & ASSOCIATES,  
ATTORNEYS AT LAW, PLLC

By:

/s/ Joshua M. Friedman

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