

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK-----X
JAMIE NARDINI ,

Plaintiff,

-against-

CITY OF NEW YORK, , RUEL STEPHENSON,
Individually, and ALEXANDRA SARUBBI,
Individually,Defendants.
-----X**TO THE ABOVE-NAMED DEFENDANTS:**

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your Answer, or if the complaint is not served with the summons, to serve a notice of appearance on Plaintiff's attorney within twenty (20) days after service of this summons, exclusive of the day of service, (or within thirty (30) days after service is complete, if this summons is not personally delivered to you within the State of New York); and in case of your failure to answer, judgment will be taken against you by default for the relief demanded hereto.

Dated: New York, New York
August 4, 2025

Yours, etc.

/s/
John Scola
Law Office of John A. Scola, PLLC
Attorneys for Plaintiff Mariela MATOS-LEO
90 Broad Street, Suite 1023
New York, New York 10004
(917) 423-1445DEFENDANTS' ADDRESSESCITY OF NEW YORK
100 Church Street
New York, NY 10007Ruel Stephenson
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New York, NY 10025Alexandra Sarubbi
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New York, NY 10025

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JAMIE NARDINI

Index No.:

VERIFIED
COMPLAINT

Plaintiff,

-against-

JURY DEMAND

CITY OF NEW YORK, RUEL STEPHENSON,
Individually, and ALEXANDRA SARUBBI,
Individually

Defendants'

-----X
The Plaintiff, JAMIE NARDINI by her attorneys the LAW OFFICE OF JOHN A. SCOLA, PLLC., as and for her complaint against defendants' CITY OF NEW YORK, RUEL STEPHENSON, Individually, and ALEXANDRA SARUBBI, Individually (collectively referred to as "Defendants") for retaliation, whistleblower retaliation and sex, gender association discrimination and for creating a hostile work environment, in violation of New York State Executive § 296, and New York City Local Law §8-107 et al.

INTRODUCTION

This is a civil rights action on behalf of Plaintiff JAMIE NARDINI (hereinafter referred to as "Plaintiff") to vindicate her rights related for retaliation, whistleblower retaliation and sex, gender association discrimination and for creating a hostile work environment created by the Defendants CITY OF NEW YORK, (hereinafter referred to as "CITY"), RUEL STEPHENSON, (hereinafter referred to as "STEPHENSON"), and ALEXANDRA SARUBBI, (hereinafter referred to as "SARUBBI"). More specifically, Plaintiff seeks compensatory, emotional distress and punitive damages against all Defendants as well as attorney's fees related to the deprivation

of Plaintiff's rights secured by New York State Executive § 296, and New York City Local Law §8-107 et al. Plaintiff was denied employment benefits following her objections to favorable treatment for New York City Police Department ("NYPD") officers who were in a sexual relationship with Defendant STEPHENSON and her objections to the favorable treatment. Plaintiff suffered unlawful retaliation following her complaints of disparate treatment on the basis of sex and gender. Plaintiff was further retaliated against for complaints of violations of law within the Patrol Borough. When Plaintiff objected to these parties, she was retaliated against as described herein.

PROCEDURAL REQUIREMENTS

1. Plaintiff has filed suit with this Court within the applicable statute of limitations period.

PLAINTIFF

2. Plaintiff JAMIE NARDINI is a female citizen of the United States of America, over twenty-one (21) years of age, resident of Rockland County.
3. Plaintiff is a White woman and current Lieutenant in the NYPD

DEFENDANTS'

4. Defendant the CITY OF NEW YORK is a municipal corporation organized and existing under and by virtue of the law of the State of New York.
5. Defendant RUEL STEPHENSON is a current Assistant Chief in the New York City Police Department and is employed by the Defendant CITY OF NEW YORK. At all times relevant herein. Defendant STEPHENSON is the Commanding Officer of Patrol Borough Manhattan North.
6. Defendant STEPHENSON is five (5) ranks higher than Plaintiff.
7. Defendant STEPEHNSON at all times herein had the power to suspend, discipline,

punish, transfer Plaintiff.

8. Defendant ALEXANDRA SARUBBI is a current Inspector in the New York City Police Department and is employed by the Defendant CITY OF NEW YORK. At all times relevant herein, Defendant SARUBBI is assigned to Patrol Borough Manhattan North.
9. Defendant SARUBBI is three (3) ranks higher than Plaintiff.
10. Defendant SARUBBI at all times herein had the power to suspend, discipline, punish, transfer Plaintiff.
11. Defendant CITY, and their agency the NYPD, are equal opportunity employers which prohibit discriminatory employment actions against, and treatment of, their employees and applicants for employment based on actual or perceived race, color, national origin, alienage or citizenship status, religion or creed, gender (including “gender identity” -- which refers to a person’s actual or perceived sex, and includes self-image, appearance, behavior or expression, whether or not different from that traditionally associated with the legal sex assigned to the person at birth), disability, age (18 and over), military status, prior record of arrest or conviction, marital status, partnership status, genetic information or predisposing genetic characteristic, sexual orientation, status as a victim or witness of domestic violence, sex offenses or stalking, and unemployment status.

FACTUAL ALLEGATIONS

12. Plaintiff joined the NYPD in July 2006 as a police officer.
13. After successfully completing the Police Academy, Plaintiff was assigned to Manhattan North for Manhattan North Impact Response Team.
14. At all times herein, Plaintiff excelled in her role as a police officer.
15. Plaintiff worked in Manhattan North Impact Response Team, for 2 ½ years.

16. In 2009, Plaintiff transferred to the 30th Precinct.
17. While in the 30th Precinct Plaintiff was under the Command of Commanding Officer Defendant STEPHENSON.
18. At that time, Plaintiff was in an abusive relationship with a fellow NYPD officer who she had a child with.
19. Throughout the end of an abusive relationship, Defendant STEPHENSON helped Plaintiff as she was dealing with the relationship and her two year old daughter.
20. Defendant STEPHENSON removed Plaintiff from patrol and placed her in the administrative Crime Analysis position to allow her to handle her private life.
21. In 2010, Plaintiff's ex-boyfriend was terminated as a police sergeant for perjury and misconduct.
22. Plaintiff felt indebted to Defendant STEPHENSON for his kindness following the abuse.
23. In the early 2014, Defendant STEPHENSON transfers Commands and becomes the Commanding Officer of the 47th Precinct.
24. In 2015, Plaintiff is promoted to Sergeant.
25. Following her promotion, Plaintiff is assigned to the 43rd Precinct.
26. At all times herein, Plaintiff excelled in her role as a sergeant.
27. Plaintiff's stellar performance did not go unnoticed.
28. Plaintiff was given the Crime Analysis position the Precinct.
29. In 2017, Defendant STEPHENSON was promoted to Deputy Chief and transferred to the NYPD's Housing Bureau.
30. Unknown to Plaintiff at this time, Defendant STEPHENSON ran afoul of NYPD

Executives as he was having an affair with his driver who bragged about her relationship with Defendant STEPHENSON and that she could not be disciplined.

31. This angered Chief David Barrere who Ordered the woman transferred.
32. Upon information and belief, Defendant STEPHENSON intervened to protect his driver whom he was having an illicit affair.
33. Chief Barrere ultimately responded by transferring Defendant STEPHENSON to Patrol Borough Brooklyn South as a punishment for his illicit relationship in October 2020.
34. Defendant STEPHENSON is given the Executive Officer position
35. No true disciplinary actions were taken against Defendant STEPHENSON but from this point forward, the Defendant CITY possessed actual knowledge of Defendant STEPHENSON's on the job illicit affairs and the problems these relationships caused but failed to take corrective action.
36. This punishment constituted "highway therapy" for Defendant STEPHENSON as he was forced to drive much further to work than he had previously.
37. This common retaliatory practice is known as Highway Therapy in the NYPD.
38. On October 28, 2022, Plaintiff was promoted to Lieutenant.
39. Following her promotion, Plaintiff was assigned to the 23rd Precinct and then the 30th Precinct.
40. At all times herein, Plaintiff excelled in her role as a Lieutenant.
41. Plaintiff worked in the Precincts for a little more than 6 months.
42. During that time she was a Platoon commander and was given the Field Training Unit position.
43. Defendant STEPHENSON remained shelved in this position in Patrol Borough

Brooklyn South until April 28, 2023 when he was promoted to Assistant Chief.

44. On April 28, 2023, Defendant STEPHENSON is also named Commanding Officer of the NYPD's Patrol Borough Manhattan North
45. In May 2023, Plaintiff is contacted by Defendant STEPHENSON.
46. Defendant STEPHENSON tells Plaintiff that the interview would be a formality as he has chosen her for the position.
47. Defendant STEPHENSON tells Plaintiff that he needs someone who will be honest with him.
48. Plaintiff accepts the position and transfers to the Borough on May 25, 2023.
49. Plaintiff brings Sergeant Miguele Amoresano her as part of the transfer.
50. Sergeant Amoresano became Plaintiff's Assistant Operations Coordinator.
51. Initially everything was great for Plaintiff.
52. After being transferred to the Borough Plaintiff worked extremely hard but the work was enjoyable.
53. The team felt like they were truly rebuilding the Borough.
54. The work was meaningful and important.
55. The atmosphere changed around November 2023 when Defendant STEPHENSON became obsessed with the planning of the Borough's Christmas party.
56. Defendant STEPHENSON became obsessed with ensuring his party was the biggest in the NYPD.
57. Defendant STEPHENSON wanted the party to be bigger than the other NYPD Borough parties and the Hispanic parties.
58. Defendant STEPHENSON wanted to be known as the Party Chief.

59. Around this time, Detective Parastoo Rouhi transferred into the Borough from the Intelligence Bureau.
60. Detective Rouhi became the Special Operations Detective and became Plaintiff's direct subordinate.
61. When Detective Rouhi transferred in to the Borough, Defendant STEPHENSON made it well known that he did not know the Detective.
62. It was later discovered that Defendant STEPHENSON had previously worked with Detective Rouhi in the 32nd Precinct where he was her Executive Officer.
63. Defendant STEPHENSON removes Police Officer Soto from the party planning position and places Detective Rouhi in that role.
64. Detective Rouhi primary, and seemingly sole, job in the Borough is to plan parties for Defendant STEPHENSON.
65. Defendant STEPHENSON is determined to make the party as big as possible and exerts real pressure on the Commanding and Executive Officers under his command to sell the tickets for the party.
66. Commanding and Executive Officers in the Borough are informed that they must sell the party tickets at every roll call.
67. The tickets cost approximately \$125 per person.
68. Defendant STEPHENSON pushes the Commanding and Executive Officers extremely hard to sell the tickets.
69. On Executive Conference calls, Defendant STEPHENSON will call out the number of tickets sold by Commanders and inform that that they need to sell more tickets.
70. Defendant STEPHENSON then states that if any officer wants to attend the party, they

must be given the night off so they can attend.

71. Defendant STEPHENSON further informs that Commanding Officers if they do not sell enough tickets there will be consequences.
72. Defendant STEPHENSON states on numerous occasions that if the Commanding Officers do not sell more tickets then he will have then on the podium in BOROSTAT meetings “for hours.”
73. Blank Envelopes were given to each Commanding Officer which were given to collect the amount of tickets sold and the list of people who bought the tickets.
74. On each call that would follow, Defendant STEPHENSON would announce the status of the ticket sales per Command.
75. When the Commanding Officers object to this Order as they are worried about minimum manning for the Commands, Defendant STEPHENSON just tells them that they have no choice, and they must let the officer off for the party even if the Command falls below minimum manning.
76. Plaintiff is forced to deal with angry Commanding Officers who call her to complain that they cannot focus on fighting crime because they have to deal with Defendant STEPHENSON’s stupid party.
77. Undeterred Defendant STEPHENSON was adamant that a certain amount of police officers from every Command must attends as well as every Commanding and Executive Officer.
78. Defendant STEPHENSON was adamant that the party would increase morale but the pressure surrounding the party caused more chaos than relief in the Borough.
79. The Christmas party is held on December 8, 2023.

80. The party is largely attended by NYPD Executives.
81. The party is also attended by Commissioner Edward Caban, Chief of Department Jeffrey Maddrey, his girlfriend Lieutenant Quathisha Epps, and Chief of Patrol John Chell.
82. The party has a best dressed competition which is hosted on the site Survey Monkey.
83. One of the winners of the competition, informed her Command of the URL code to vote for her for the contest which leads her to have the most votes by a large margin.
84. The lack of sanctity to the competition for best dressed angers Defendant STEPHENSON who openly complains to Plaintiff.
85. Defendant STEPHENSON tells Plaintiff that next year, she must ensure the competition is fair and that the true best dressed is crowned.
86. Following the end of the Borough party, the after party was held at Con Sofrito in the Bronx.
87. Plaintiff attends the after party where Defendant STEPHENSON introduces her to the club owner, Jimmy Rodriguez.
88. Prior to being a co-owner of Con Sofrito Jimmy Rodriguez owned Jimmy's Bronx Café.
89. Though never himself charged with wrongdoing, Rodriguez lost two of his prior businesses to drug busts, and his eponymous eatery was allegedly so rife with "unsavory characters" and narcotics in the 1990s that Major League Baseball warned players against visiting it.
90. Despite this history of criminal association, Defendant STEPHENSON described Rodriguez to Plaintiff as a friend.
91. Defendant STEPHENSON is extremely intoxicated at the after party.

92. The Club was full of hookah smoke and Plaintiff was made uncomfortable by the situation.
93. Plaintiff had one drink and left the after party.
94. It is later known that Defendant STEPHENSON leaves the after party with Detective Rouhi.
95. From that point forward it is known in the Borough that Defendant STEPHENSON is having an affair with Detective Rouhi.
96. Following the new year in January 2024, the relationship between Defendant STEPHENSON and Detective Rouhi had noticeably shifted.
97. Detective Rouhi would meet with Defendant STEPHENSON in his office with the door closed or in the Chief's dormitory.
98. Defendant STEPHENSON did not meet with other people in that manner or allow them into the dormitory
99. Around this time Detective Rouhi's schedule became unpredictable.
100. Plaintiff would attempt to talk to Detective Rouhi about her schedule and would be told that it had been modified "as per the Chief."
101. Detective Rouhi was also becoming increasingly more combative with other members of service in the Borough.
102. Detective Rouhi would make comments like "I only fuck 2 Stars" to Borough police officers and multiple other officers see the Detective text messaging "Ruel" on her phone.
103. Around this time Detective Rouhi is seen texting a Ruel in her phone.
104. Ruel is the first name of Defendant STEPHENSON.

105. It is clear that Detective Rouhi and Defendant STEPHENSON have more than a professional relationship.
106. No one in the Borough calls the Chief by his first name Ruel.
107. Detective Rouhi proceeds to get into daily arguments with officers under Plaintiff's supervision.
108. Specifically Det Rouhi argues with Communication Officer Espinola, Communication Officer Soto and Plant Manager Melendez
109. Plaintiff speaks with each of these officers and is informed that Detective Rouhi refuses to do work or help with the tasks in the office.
110. They state that Detective Rouhi believes she is "untouchable" and cannot be disciplined for her behavior and is increasingly volatile.
111. Detective Rouhi is jealous of Officer Soto who is friends with Defendant STEPHENSON.
112. Officer Soto tells Plaintiff that she believes Detective Rouhi is attempting to have her removed from the Borough because she views her as a threat to her relationship with Defendant STEPHENSON.
113. The strained relationship causes friction in the office and makes Plaintiff's job more difficult.
114. Plaintiff instructs Officer Soto to continue working and try to keep her conversations to a minimum with Detective Rouhi.
115. The sexual relationship between Detective Rouhi and Defendant STEPHENSON causes the office to work in a hostile work environment.
116. Detective Rouhi receives favorable treatment in the office due to her relationship with

Defendant STEPHENSON.

117. Other members of service who are not engaging in a sexual relationship with Defendant STEPHENSON, are forced to work every day do not receive preferential treatment.
118. Shortly after this time, Defendant STEPHENSON calls Plaintiff into his office and informs her that there is a distasteful photo of him being spread around the Borough.
119. Plaintiff is tasked with determining who has the photo and disciplining the parties responsible for spreading the photo.
120. The photo is a picture where Officer Soto photobombs a picture and it looks like she is making a funny face near Defendant STEPHENSON.
121. There is no actual contact, and the photo is a harmless joke.
122. Detective Rouhi convinces Defendant STEPHENSON that Officer Soto is the one spreading the photo.
123. Plaintiff is able to confirm that it was Detective Rouhi that was spreading the photo and then lying to Defendant STEPHENSON by telling him it is Officer Soto.
124. When Plaintiff informs Defendant STEPHENSON of the findings he is livid.
125. Defendant STEPHENSON tells Plaintiff "It's not Paris, it is Veronica."
126. Defendant STEPHENSON forces Plaintiff to confront Officer Soto.
127. Officer Soto apologies and is visibly upset.
128. Officer Soto further tells Plaintiff that Detective Rouhi is the one causing the problems.
129. Plaintiff knows that to be true but is powerless to stop the behavior due to Defendant STEPHENSON's sexual relationship with Detective Rouhi.
130. At all times herein the sexual relationship between Defendant STEPHENSON and Detective Rouhi causes the other employees of the Borough to work in a hostile work

environment.

131. At all times herein the sexual relationship between Defendant STEPHENSON and Detective Rouhi causes the other employees of the Borough to be treated less well because they are not in a sexual relationship with Defendant STEPHENSON.
132. In February 2024, Plaintiff is introduced to Carmen Susana Osorio.
133. At the time, Plaintiff is looking for a place have a small buffet and to have Defendant STEPHENSON's surprise birthday party.
134. Unknown to Plaintiff, Ms. Osorio was extremely close to Mayor Eric Adams and was even part of his transition team into office as Mayor.
135. On February 8, 2024, Mayor Adams hosted an awards celebration for the Office of Minority and Women Owned Businesses (MWBE).
136. This event was to honor vendor firms that achieved the contract awards over the last year and to help inform what's on the horizon within MWBE.
137. Ms. Osorio is honored at the event by Mayor Adams.
138. Plaintiff books the event at Ms. Osario's restaurant.
139. In the lead up to the party, Law and Order books the restaurant to film and the party is moved to a different restaurant owned by Ms. Osario, Bocadito Bistro.
140. Detective Rouhi has a breakdown over the change in venue, starts crying and refuses to call the party guests to inform them of the change.
141. The party is a success.
142. One guest, a connected political figure, did not receive the change in address and contacts Defendant STEPHENSON.
143. Defendant STEPHENSON is angry about the mistake and is told that it was Officer Soto's fault.

144. Plaintiff defends Officer Soto as she had done nothing wrong.
145. Defendant STEPHENSON seems to understand but then asks Plaintiff why Detective Rouhi was not invited to the after-hours party.
146. Plaintiff is confused by the question as is Sergeant Amoresano.
147. After the luncheon, Plaintiff and Sergeant Amoresano went home.
148. Apparently there was an impromptu party that Detective Rouhi was unaware of.
149. Detective Rouhi proceeded to get into an altercation with another officer at the party, Espinola.
150. Defendant STEPHENSON is visibly upset with Officer Espinola who did nothing wrong.
151. Plaintiff explains to Defendant STEPHENSON that Detective Rouhi is unbalanced and not a good fit here.
152. Plaintiff further states that Detective Rouhi is not stable and refuses to contribute.
153. Plaintiff further objects to the preferential treatment Detective Rouhi was receiving from Defendant STEPHENSON.
154. Defendant STEPHENSON responds by stating that Plaintiff and her team had let Detective Rouhi down and that no one should feel left out.
155. Plaintiff is forced to continue to work in a hostile work environment over Detective Rouhi's relationship with Defendant STEPHENSON.
156. Over the next several months the environment in the office becomes increasingly hostile.
157. Detective Rouhi gets in nearly daily arguments with the team members.
158. Plaintiff is powerless to remove her due to her relationship with Defendant

STEPHENSON.

159. In March 2024, Defendant STEPHENSON made it clear that he wanted Police Officer Asillis to be transferred to the Borough from the 28th Precinct.
160. Officer Asillis is a young Hispanic woman, which is Defendant STEPHENSON's type.
161. As it becomes known that Defendant STEPHENSON wants the woman to transfer to the Command, Detective Rouhi is noticeably angry.
162. Plaintiff is forced to go to Defendant STEPHENSON directly to inform him that bringing Officer Asillis to the Borough would be a problem,
163. Detective Rouhi was already vocal about her dislike for the woman officer and Officer Duffy was more qualified for the position.
164. Defendant STEPHENSON considers Plaintiff's recommendation over the weekend and then tells her that he wants to pick up Officer Duffy because her mother is legacy NYPD.
165. The Borough also picks up videographer and photographer Officer Little from the 25th Precinct at that same time.
166. Officer Little is assigned to communications where she is tasked with recording events, taking photographs and posting on social media.
167. Plaintiff witnesses first-hand the relationship between Detective Rouhi and Defendant STEPHENSON.
168. At multiple events, Plaintiff witnesses Detective Rouhi text messaging "Ruel" which is Defendant STEPHENSON.
169. On one occasion Detective Rouhi announces that she is not going to an event in Queens because she does not have a dress to wear.
170. Detective Rouhi is seen crying over the event.

171. Detective Rouhi shows up to the Queens event anyway but does not have a seat since she announced she would not attend.
172. Plaintiff is able to squeeze Detective Rouhi in, but Detective Rouhi is upset that there was no seat for her.
173. Detective Rouhi leaves the event visibly upset.
174. Officer Melendez is driving Defendant STEPHENSON that evening and leaves with him.
175. The following week Detective Rouhi begins talking negatively about Officer Melendez.
176. Detective Rouhi escalates the hostility towards Officer Melendez which leads to Plaintiff having to separate the two in the stairwell.
177. Plaintiff would remove Detective Rouhi if she could as the Detective is causing problems for the other people in the office, whom she attacks on a daily basis.
178. Plaintiff cannot remove Detective Rouhi because she is protected by Defendant STEPHENSON.
179. As a result of Plaintiff's inability to remove Detective Rouhi she is forced to continue to work in a hostile work environment.
180. Following the altercation wherein Detective Rouhi caused a scene and berated Officer Melendez, Defendant STEPHENSON is angry with Officer Melendez for his treatment of Detective Rouhi.
181. Plaintiff attempts to defend Officer Melendez, who did nothing wrong.
182. Officer Melendez is immediately removed as Defendant STEPHENSON's driver and only has limited conversations with him from this point further.
183. It is clear to Plaintiff that Detective Rouhi had lied to Defendant STEPHENSON about

the interaction because she was jealous.

184. Officer Melendez is upset about his misfortune and complains to Plaintiff that Detective Rouhi had sabotaged his career.
185. Plaintiff knew what Officer Melendez was saying was true but was powerless to stop it.
186. Plaintiff advises him to try to steer clear of Detective Rouhi.
187. Around this time, it is brought to Plaintiff's attention that Operations Lieutenant Kenan Sheppard, a close personal friend of Defendant STEPHENSON, was sleeping all day at work and the Operations Division at Police Headquarters was having trouble locating him.
188. Plaintiff is further informed that Sheppard is not doing any work in his office and that he took a vehicle to work his second job at Madison Square Garden.
189. Plaintiff is further informed that Sheppard parties at night with Defendant STEPHENSON and then is allowed to sleep all day.
190. Plaintiff is further informed that Sheppard, while assigned to details, disappears after arriving which is angering the Operations Division and is drawing negative attention towards the Borough.
191. Plaintiff speaks with Defendant STEPHENSON over the situation and explains that Sheppard is causing problems for her and the Borough.
192. Defendant STEPHENSON is visibly annoyed with Plaintiff for bringing up Sheppard's misconduct.
193. When Plaintiff is complaining about is Sheppard stealing time while on duty.
194. These complaints by Plaintiff constitutes complaints of potential criminal activity.
195. Defendant STEPHENSON following Plaintiff's complaints of Shepards potentially

unlawful conduct, never meets privately with Plaintiff again.

196. The subsequent retaliation of Plaintiff following her complaints of Sheppard constitutes violations of Civil Service 75-b.
197. In April 2024, Defendant SARUBBI is transferred into the Borough.
198. Plaintiff knew Defendant SARUBBI from the 30th Precinct and is initially excited for her to join the Borough.
199. After joining the Borough Defendant SARUBBI makes clear that Police Officer Guiseppi Altadonna is to only be assigned to her assignments and he is to not be given any other work.
200. Officer Altadonna is assigned to the Crime Analysis Unit and given a desk on the 4th Floor.
201. The supervisors of the Crime Analysis Unit attempt to assign Officer Altadonna work which is abruptly halted by Defendant SARUBBI.
202. There is a running joke in the Borough that now there are two people in the office who do not do work, Officer Altadonna and the sleeping Lieutenant Sheppard.
203. Borough personnel are extremely angry that Defendant STEPHENSON had brought in two people who refuse to do work.
204. Officer Altadonna becomes the unofficial speech writer for Defendant STEPHENSON which seems to be his only function.
205. The Borough is now equipped with a full time party planner, speech writer and napper which results in piled up work.
206. In May 2024, the Borough was focused on planning the “White Party” which was scheduled for the end of July.

207. Detective Rouhi is in charge of the planning and is extremely agitated on the day that the internal memorandums must be submitted about the party.
208. On the day the party memorandum were due, there was a lot going on in the Borough.
209. Plaintiff was not at work but was being relayed updates in real time by Sergeant Amoresano.
210. On that day Plaintiff is informed that executive schedule was incorrect, and Headquarters was calling to request immediate changes to the executive duties.
211. There were many priorities happening on that day, none of which included the memorandums for the White Party.
212. Based on the needs of the Borough, Sergeant Amoresano orders Officer Espinola to stop working on the party memorandums and to assist him with scheduling as per Headquarters' request.
213. This angered Detective Rouhi and went to speak with Defendant STEPHENSON.
214. Detective Rouhi enters Defendant STEPHENSON's office despite the door being closed
215. Detective Rouhi opens Defendant STEPHENSON's office door and begins screaming to him about Officer Espinola and the party memorandums.
216. During the outburst Detective Rouhi yells, cries, states that she is going to get collared and even snaps a pencil.
217. The entire incident is witnessed by Sergeant Amoresano and Defendant SARUBBI.
218. Following the outburst, Officer Espinola is told to pack up her desk and she is sent to Crime Analysis.
219. Plaintiff is informed of the move by Sergeant Amoresano.

220. Plaintiff contacts Defendant SARUBBI who tells her once she is back at work they would sit down with Defendant STEPHENSON to go over the Officer Espinola incident.
221. When Plaintiff returns from work she asks to speak with Defendant STEPHENSON.
222. Defendant STEPHENSON then tells Plaintiff to speak with Defendant SARUBBI and closes the door to his office.
223. Plaintiff is met by Defendant SARUBBI who informs her that Defendant STEPHENSON will not meet with her about Officer Espinola.
224. Plaintiff asks Defendant SARUBBI whether proper notifications have been made following Detective Rouhi's violent outburst.
225. Plaintiff further asks if NYPD Psychological Services Unit had been called on Detective Rouhi.
226. Specifically Plaintiff tells Defendant SARUBBI that Detective Rouhi is an emotionally disturbed person who has had escalating outbursts since her and Defendant STEPEHNSON began their inappropriate relationship.
227. Plaintiff further adds that the other employees in the Borough regularly complain about the disparate treatment that Detective Rouhi receives due to her relationship with Defendant STEPHENSON.
228. Plaintiff adds that the favorable treatment has caused everyone in the Borough to work in a hostile work environment.
229. Plaintiff further asks for help with Lieutenant Sheppard who refuses to do work based on his relationship with Defendant STEPHENSON but is responsible for Operations Unit.

230. Plaintiff also states that Lieutenant Sheppard had enlisted Sergeant Weitzman to assist in the Operations Unit, but Sergeant Weitzman does no Operations work.
231. Sergeant Weitzman is a regular with Lieutenant Sheppard and Defendant STEPHENSON.
232. Plaintiff adds that she is struggling to complete the work of the officers who are connected to Defendant STEPHENSON.
233. Plaintiff further tells Defendant SARUBBI that Officer Espinola had done nothing wrong and is still upset about being removed from the office
234. Defendant SARUBBI says she will assist Plaintiff with Lieutenant Sheppard but never does.
235. Plaintiff advises Officer Espinola to remain in Crime Analysis as it is safer there, given the Defendant STEPHENSON's relationship with Detective Rouhi.
236. Plaintiff further advises Officer Espinola to be careful what she says because Officer Altadonna is in that office and will report what is said back to Defendant SARUBBI.
237. On June 28, 2024, Detective Rouhi is promoted to Detective 1st Grade.
238. At the time of her promotion to Detective 1st Grade, Detective Rouhi's sole responsibilities are planning parties for Defendant STEPHENSON.
239. This promotion causes a great deal of internal strife within the NYPD.
240. Specifically the Intelligence Bureau is livid that Detective Rouhi was promoted.
241. Detective Rouhi had transferred into the Borough from Intelligence Bureau.
242. The Intelligence Bureau was irate that Detective Rouhi was promoted for "fucking a chief" over the many detectives who earned the promotion.
243. The internal complaints are so loud that the next day an addendum is made to the

promotional list and two detectives from the Intelligence Bureau are added to be promoted to Detective 1st Grade.

244. Detective Rouhi is so upset over the commotion that she tells an officer, “I didn’t receive this promotion because I was fucking a Chief. I received this promotion because my father contributed more than \$40,000 to Mayor Adams campaign.”
245. Detective Rouhi then reiterates that the promotion did not happen because Defendant STEPHENSON or Susana Osario made a phone call.
246. Ironically, on another occasion Plaintiff overhears Defendant STEPHENSON asking Ms. Osario to call Mayor Adams to help push a promotion through.
247. That same day, Plaintiff sees a Batman logo flash on Detective Rouhi’s private cell phone.
248. When she answers the phone Plaintiff can hear Defendant STEPHENSON on the other line.
249. Defendant STEPHENSON is obsessed with Batman and has office covered in Batman trinkets.
250. The hostile work environment caused by the romantic relationships of Defendant STEPHENSON continues.
251. The night before the White Party in July 2024, Plaintiff, Lieutenant Symister, Officers Duffy, Salazar and Detective Rouhi meet Susana Osario at The Hudson, formally La Marina, to set up for the party.
252. Ms. Osario has her decorating crew at the venue and advises the NYPD officers to stand aside while the professionals decorate.
253. Detective Rouhi insists on getting involved in the decorating which results in miscut

fabric and several errors which angers the decorating professionals.

254. Thereafter Detective Rouhi contacts Defendant STEPHENSON and tells them that Plaintiff and her team did nothing and she was forced to set up the entire party.
255. Defendant STEPHENSON is angered by Detective Rouhi's report which was factually inaccurate.
256. The next day the party is held.
257. Plaintiff works the party, so she doesn't have to pay more than \$100 for a ticket.
258. Plaintiff is tasked with working the door to the party where she has to check in guests.
259. The party is attended by Mayor Eric Adams, Department of Transportation Commissioner Ydanis Rodriguez and Police Commissioner Caban's twin brother.
260. On this occasion, the afterhours party was to be held at Mama Sushi on Dyckman Avenue which is owned by Ms. Osario.
261. At the afterhours party, Detective Rouhi was pouring wine for Defendant STEPHENSON in the back of the venue with Mayor Adams and Lieutenant Sheppard.
262. While at the afterhours party, Defendant STEPHENSON gets up from his table when a woman approaches him and begins to grind on him.
263. Detective Rouhi becomes extremely angry and leaves the party.
264. Lieutenant Sheppard is supposed to be handling the parking detail for the event.
265. The NYPD assigned 1 sergeant and 8 officers to assist.
266. Lieutenant Sheppard approaches Plaintiff and informs her that she must take over the parking and then abruptly leaves.
267. Plaintiff is forced to oversee the detail.
268. Plaintiff lets the officers leave and she goes home.

269. Plaintiff says to herself that as she leaves “this is the last afterhours party I will attend.”
270. Plaintiff’s refusal to attend these afterhours parties becomes a huge problem to Defendant STEPHENSON who retaliates against Plaintiff.
271. Specifically, Plaintiff does not want to attend these extracurricular parties which evolve into drunken debauchery.
272. At these parties Plaintiff is forced to watch NYPD drink and engage in inappropriate behavior which includes officers drinking excessively, overt sexual conduct, and arguments.
273. To make matters worse, for this party Defendant STEPENSON makes Officer Duffy open a private joint bank account with Detective Rouhi for the parties which is separate and apart from the NYPD.
274. It is unclear how much money Defendant STEPHENSON makes off of these parties.
275. Patrol Borough Manhattan North has a separate bank account for the Borough Club that had previously thrown parties.
276. The account created by Defendant STEPHENSON is separate and apart from the Patrol Borough Manhattan North account that was overseen by the NYPD.
277. In fact when officers made out checks to the Borough Club, they were rejected and informed that the check must be made out to the new account.
278. Defendant SARUBBI also had access to the account.
279. Plaintiff objects to the secret account and informs Defendant SARUBBI that she will no longer work on the party planning.
280. Plaintiff is further retaliated against when she objects to the misconduct and likely illegal conduct.

281. As a result of the hostile work environment caused by the relationships of Defendant STEPHENSON.
282. In July 2024, Officer Keith Hall is transferred into the Borough to be a driver for Defendant STEPHENSON.
283. Plaintiff is instructed that Officer Hall can only be assigned to be a driver for Defendant STEPHENSON.
284. Officer Hall is often seen leaving with Lieutenant Sheppard and Defendant STEPHENSON and is a regular fixture in their party scene.
285. Officer Hall is also untouchable and disappears for entire days of work.
286. When Plaintiff confront him Officer Hall says he was busy “as per the Chief” and Plaintiff is powerless to discipline him.
287. To date the following employees receive favorable treatment based on their relationships:
- a. Detective Rouhi- Promoted, Cannot be disciplined and creates hostile work environment because of her sexual relationship with Defendant STEPHENSON
 - b. Police Officer Altadonna- Cannot be disciplined or assigned work, This is based on his relationship with Defendant SARUBBI
 - c. Police Officer Hall- Party friend of Defendant STEPHENSON, unable to discipline or assign work
 - d. Detective Hall- Party friend of Defendant STEPHENSON, unable to discipline or assign work
 - e. Lieutenant Sheppard - Party friend of Defendant STEPHENSON, unable

to discipline or assign work

- f. Sergenat Weitzman- Party friend of Defendant STEPHENSON and Lieutenant Sheppard, unable to discipline or assign work

288. Plaintiff is trying to stop the spread of the growing cancer in the Borough.
289. Plaintiff continues to be passed over for the discretionary promotion to Lieutenant Special Assignment.
290. Officers in the rank Lieutenant Special Assignment earn approximately \$25,000 more in salary per year than Lieutenants.
291. Additionally, Lieutenant Special Assignment are given a higher rate of overtime pay.
292. In January 2024, Plaintiff was first on the list to receive the promotion.
293. As a result of Plaintiff's complaints related to the sexual relationship between Detective Rouhi and Defendant STEPHENSON and her complaints about the illegalities being committed in the office, Plaintiff was removed from the promotional list.
294. Each month, Plaintiff is passed over for promotion.
295. The Lieutenant who was previously behind Plaintiff for promotion gets the promotion to Lieutenant Special Assignment.
296. This failure to promote Plaintiff is retaliation for her objections to the favorable treatment received by Detective Rouhi and for her complaints of misconduct and criminal activity.
297. Defendant STEPHENSON claims that he had nothing to do with the promotion which is a lie.
298. Plaintiff is denied the promotion because she objects to the relationship between Defendant STEPHENSON and Detective Rouhi, the hostile work environment is causes

and for objecting to the likely criminal activity surrounding the parties.

299. Following the many complaints of Plaintiff, each of which are protected activity, Defendant STEPHENSON refuses to communicate with her.
300. Defendant SARUBBI is tasked with interacting with the members of service in the Borough.
301. Defendant SARUBBI is incredibly rude to the people in the Borough.
302. On one occasion, Defendant SARUBBI makes Officers Espinola and Duffy cry when she berates them for telling “secrets” in the corner of the office.
303. Following the yelling, Plaintiff learns that Officers Espinola and Duffy were talking about their mothers, one of who was sick and the other that had passed away from cancer which was the catalyst for Defendant SARUBBI’s anger.
304. Plaintiff cannot bite her tongue anymore and tells Defendant SARUBBI that everyone in the Borough is talking about Lieutenant Sheppard, Detective Rouhi, the two Halls, and Altadonna essentially having “no show” jobs.
305. Plaintiff is complaining to Defendant SARUBBI about the crimes of these officers who are getting paid by the Defendant CITY to not work and is retaliated against.
306. Plaintiff’s complaints trigger retaliation protection under Civil Service law 75-b.
307. In September 2024, the Halloween Party planning is in full swing.
308. Plaintiff has been removed from party planning due to her complaints of favoritism, fraud and objections to the likely illegal parties.
309. Plaintiff views it as a blessing as she has real work to do.
310. On September 20, 2024, Plaintiff receives a call from the Chief of the Department’s Summons Section office about an unpaid work zone violation summonses that needs to

be answered for which stemmed from Defendant STEPHENSON's unmarked vehicle.

311. The ticket from Defendant STEPHENSON's unmarked vehicle showed him driving the vehicle heading northbound in West Chester County.
312. Tickets are a common occurrence in the Command which are normally handled by the driver filling out forms to justify the need to speed and avoid the ticket.
313. Following the call, Plaintiff gets the form to give to the driver.
314. The Chief of the Department's Summons Section office calls Plaintiff back and lets her know that they tried to email Defendant STEPHENSON multiple times, but he has ignored the messages for nearly a month and that the summons has to be paid today.
315. Plaintiff inquires about the urgency to pay the ticket and is informed that this is a New York State work zone ticket showing that Defendant STEPHENSON was heading northbound on I-87 in Westchester County at the time he received the violation.
316. Plaintiff immediately offers her credit card to pay the ticket.
317. On September 20, 2024, Plaintiff pays \$50.00 paid on her credit card on for Violation # T00738861.
318. The next day Defendant STEPHENSON works, Plaintiff informs him of the summons and that she paid it.
319. Defendant STEPHENSON gives Plaintiff \$50.00 in cash to pay her back for the fine.
320. Shortly thereafter, Defendant SARUBBI approaches Plaintiff and tells her that she has a big mouth and that private conversations between Plaintiff and Defendant STEPHENSON need to stay private.
321. Plaintiff is confused by the conversation.
322. Defendant SARUBBI tells Plaintiff that Defendant STEPHENSON is upset about the

conversation related to the ticket.

323. Defendant SARUBBI tells Plaintiff that conversations like the one she had with Defendant STEPHENSON needed to be done in private.

324. Plaintiff is genuinely confused.

325. Plaintiff is later informed that Defendant STEPHENSON's ticket was issued in the vicinity of Detective Rouhi's residence which is why the Chief was so angry.

326. In October 2024, Sergeant Amoresano warned Plaintiff that Defendant STEPHENSON was angry with her over Sergeant Weitzman.

327. Plaintiff did not think much of it as she had not interacted with Sergeant Weitzman for some time.

328. On October 9, 2024 Defendant STEPHENSON calls Plaintiff into her office to yell at her in front of Defendant SARUBBI and Lieutenant Symister in a way that he has never yelled at her before.

329. Plaintiff is blindsided by the meeting.

330. In the meeting Defendant STEPHENSON accuses Plaintiff of nearly driving Sergeant Weitzman to harm himself.

331. Plaintiff is so concerned about Sergeant Weitzman that she tells Defendant STEPHENSON she will fix whatever she has done.

332. Plaintiff leaves work a mess and is forced to go sick because she is so distraught on October 10 and 11, 2024.

333. When Plaintiff returns to work she talked to Sergeant Weitzman.

334. Plaintiff informs Sergeant Weitzman of the conversation she had with the Chief and how devastated she was.

335. Sergeant Weitzman tells Plaintiff that he talked to Defendant STEPHENSON about the treatment he was receiving from some co-workers and that he only included Plaintiff's name because she was friends with the Integrity Control Officer's staff.
336. Plaintiff is not friends with the Integrity Control Officer's staff and listed the ways she had helped the Sergeant since he joined the Borough.
337. Plaintiff asked Sergeant Weitzman to speak to Defendant STEPHENSON.
338. Plaintiff immediately reports the conversation to Defendant SARUBBI.
339. Plaintiff asks to speak with Defendant STEPHENSON to clear her name and is told by Defendant SARUBBI that Defendant STEPHENSON had already informed her that Plaintiff is no longer allowed to speak to him again about Sergeant Weitzman.
340. To date Defendant STEPHENSON continues to bad mouth Plaintiff because of Sergeant Weitzman.
341. Patrol Borough Manhattan North has their Halloween party at the end of October 2024,
342. Detective Rouhi is becoming increasingly more hostile towards Officers Duffy and Little.
343. Plaintiff was growing tired of the hostile work environment caused by Defendant STEPHENSON's relationships and simply wants to just work.
344. In the lead up to the party, Detective Rouhi gets into an argument with Officer Little wherein Detective Rouhi verbally assaults her.
345. The Halloween party was held at The Hudson again in Inwood.
346. The party was incredibly cold and the officers, including Plaintiff, worked through the night to ensure Defendant STEPHENSON's Halloween party went well.
347. Detective Rouhi and Defendant SARUBBI were responsible for collecting money for

the party.

348. In November 2024, the Patrol Borough Manhattan North Turkey Giveaway was taking place.
349. Originally the goal was to give away 500 turkeys.
350. When Defendant STEPHENSON learned that another Patrol Borough was giving away 500 turkeys then he upped the number to 1000.
351. When Defendant STEPHENSON learned a fraternal organizations was giving away 1000 turkeys then he upped the number to 2000.
352. The increase in turkeys sent Detective Rouhi into a spiral and was seen crying on the floor.
353. Detective Rouhi stated that the Patrol Borough account has no money, and they were not going to be able to pay for the turkeys to giveaway.
354. Detective Rouhi had repeated outbursts about the lack of money in the account.
355. Defendant STEPHENSON informs Detective Rouhi that he will get the money for the turkeys.
356. The lack of fund are confusing to Plaintiff as the Patrol Borough had just thrown a large Halloween party that sold hundreds of tickets.
357. Even with the sale of those tickets, Detective Rouhi said there was no money in the account.
358. Defendant STEPHENSON then hands Detective Rouhi a list and tells her to go collect checks from these people as they want to donate.
359. Plaintiff was also given a list to call.
360. Plaintiff calls the first two names on the list.

361. Each recipient of the call only speaks Spanish.
362. Officer Salazar had to call the remainder of the list to speak to them.
363. Plaintiff objects to the solicitations of businesses by the NYPD.
364. These objections as well as the solicitation of ticket purchasing for parties thrown privately by Defendant STEPHENSON constitutes protected activity under Civil Service 75-b.
365. Plaintiff is further unlawfully retaliated against for her objections.
366. Defendant STEPHENSON then tells Defendant SARUBBI to have the office call to know when to go pick up the checks.
367. Ms. Osario is again heavily involved in the party planning and fund raising.
368. Defendant STEPHENSON was heard on the phone with Ms. Osario on multiple occasions demanding donations from Spanish restaurants for the giveaway that were part of the larger restaurant organization.
369. After obtaining the donations the NYPD employees in the Borough set out to purchase the 2000 turkeys.
370. This is a difficult task which requires purchases from all over the City and upstate New York.
371. The volume of turkeys requires large freezers to store.
372. NYPD officers were traveling to local supermarkets to purchase the turkeys on a daily basis to amass the 2000 that Defendant STEPHENSON required.
373. The turkeys are stored in Bronx grocery stores and even in the Magic Johnson movie theater.
374. On the date of the giveaway, the turnout was poor.

375. The Patrol Borough is lucky if they gave out 25% of the turkeys the purchased.
376. The Patrol Borough is forced to call all sector cars to try to give out the rest of the turkeys.
377. The Officers at the giveaway were trying to flag down cars to give away the turkeys.
378. The over planning and the purchasing of so many turkeys was nothing short of gluttonous.
379. To date there are still turkeys around the Borough.
380. In December 2024, Defendant STEPHENSON had his Holiday party.
381. Immediately prior to the party, an Order is issued where all temporary transfers must return to their original assignment and then reapply for a formal transfer.
382. The Patrol Borough had a lot of temporary transfers which would result in a loss of nearly a third of the people assigned to the Borough.
383. The paperwork had been previously submitted to formalize the transfers into the Borough.
384. The transfer requests were given to Lieutenant Quathisha Epps in the Chief of Department Office.
385. Those transfer forms seemingly were lost and never formally signed.
386. As a result the great workers who were assigned to the Borough were about to be sent back to their original commands.
387. This was a sad time around the Borough.
388. The Holiday party was held on December 13, 2024.
389. Plaintiff took a step back from the party planning and tried to not get involved.
390. Defendant STEPHENSON employed a new method of ticket sales by interrupting roll

calls at Commands to push ticket sales.

391. Defendant STEPHENSON would delay officers from ending their tour or answering radio run to push the ticket sales in the command.
392. Defendant STEPHENSON would also order "Return Roll Calls" where the entire Command would be brought back to the Command to hear the Borough push the tickets.
393. Return Roll Calls are used exclusively to relay important police information and should not be used to shakedown officers to buy party tickets for the financial gain of Defendant STEPHENSON.
394. Plaintiff objects to these announcements and refuses to give them.
395. Plaintiff's objections further anger Defendant STEPHENSON.
396. The night of the party, Plaintiff asks Lieutenant Medrano where she needs assistance and is given the door assignment.
397. Plaintiff sits out front for most of the night with Officer Barker.
398. Prior to leaving Plaintiff enters the party to see Defendant STEPHENSON visibly intoxicated.
399. Defendant STEPHENSON is drunkenly announcing that Officer Melendez will be his new videographer.
400. Officer Melendez was taking pictures at the party.
401. Plaintiff had given Officer Little, the Borough Videographer, the night off to avoid a situation where Defendant STEPHENSON is unhappy about a photo he did not approve of floating around.
402. Defendant STEPHENSON made clear that he was angry that Officer Little was not documenting the party.

403. On December 16, 2024, Officers Duffy, Little, Paniagua, and Keith Hall are all permanently assigned to the Borough.
404. Defendant STEPHENSON is extremely angry over the Orders.
405. Defendant STEPHENSON began to make accusations that people are “overstepping his authority” on who got picked up at the Borough.
406. No one is really sure what exactly Defendant STEPHENSON is referencing.
407. In particular Officer Hall is Defendant STEPHENSON’s main driver and there are rumors swirling that Defendant STEPHENSON has a very close relationship with Officer Paniagua.
408. Defendant STEPHENSON is shown the list of officers the Borough submitted to keep in the Command.
409. The Officers assigned to the Borough are identical to the memorandum.
410. Defendant STEPHENSON is still upset.
411. Defendant STEPHENSON orders Plaintiff on a Teams call despite her being out sick with a 103 degree fever.
412. Plaintiff gets on the call with Defendant STEPHENSON which is about Officer Little.
413. Office Little is sitting in Defendant STEPHENSON’s office with Lieutenant Symister.
414. Plaintiff, Sergeant Amoresano and Defendant SARUBBI are on the call remotely.
415. Defendant STEPHENSON is still angry that she was given the party off and did not properly take pictures for social media.
416. Defendant STEPHENSON asks Officer Little what he job functions are which she answers.
417. Defendant STEPHENSON criticizes Officer Litte’s work.

418. Plaintiff explains that Officer Little is extremely qualified and is best equipped to handle the position.
419. Defendant STEPHENSON proceeds to fire Officer Little and storm out of the office and goes into his dormitory.
420. Defendant STEPHENSON removes Officer Little from the Borough and transfers her back to patrol to the 25th Precinct.
421. In January 2025, Defendant SARUBBI called Plaintiff into an empty office and informed her that Defendant STEPHENSON wanted her to handle the receipts and financials from the Patrol Borough Manhattan North events from 2024.
422. Plaintiff stated firmly to Defendant SARUBBI that she wants her union delegate present for this conversation because this conversation was outside Plaintiff's job description with the NYPD.
423. Plaintiff objects to the Order and says that she will not collect the money.
424. Plaintiff further wonders aloud why Defendant SARUBBI, who was previously in charge of collecting the money, was suddenly trying to pawn the job off on Plaintiff.
425. Plaintiff states that the request of Defendant SARUBBI was not a lawful Order and she will have nothing to do with the money.
426. Defendant SARUBBI tells Plaintiff that she is being "dramatic" and needs to "calm down."
427. Plaintiff reiterates what she has been saying for a year at this point, "I am not touching a dollar, a check or calling anyone."
428. Plaintiff adds she doesn't like how this feels and that she doesn't want anything to do with these parties or events anymore.

429. Plaintiff states unequivocally that she is done.
430. Plaintiff is unsure why she was suddenly asked to take over the financials by Defendants STEPHENSON and SARUBBI after objecting to the parties for more than a year.
431. Prior to this request, Defendant STEPHENSON had ignored Plaintiff since Officer Little was unjustly removed.
432. Plaintiff had learned that Defendant STEPHENSON was angry with Plaintiff for skipping the after party.
433. The request makes little sense and seems like Defendants STEPHENSON and SARUBBI were trying to set Plaintiff up in some way.
434. In January 2025, the Transit Bureau required posts filled by every Command in the Department.
435. The list of five names was chosen by Defendants STEPHENSON and SARUBBI.
436. With the exception of one officer (Officer Castillo), the remaining officers who are removed all have issues with officers close to Defendant STEPHENSON.
437. Officers Little, Duffy and Hoyt are removed by Defendant STEPHENSON because they have issues with Detective Rouhi.
438. Defendant STEPHENSON removes Officer Henderson because Lieutenant Sheppard does not like her.
439. Following their removal to transit, Officers Duffy and Hoyt resigned from the NYPD.
440. At the end of January 2025, Plaintiff is informed what to write verbatim on Officer Altadonna's evaluation.
441. Officer Altadonna is given a 99 out of 100 score.
442. Lieutenant Mahoney is Ordered what to write on Detective Rouhi's evaluations.

443. She is given a perfect 100 out of 100 score.
444. Plaintiff is not evaluated despite inquiring as to the status with Defendant SARUBBI.
445. In February 2025, Defendant STEPHENSON is served with a lawsuit alleging sexual harassment surrounding a Holiday party.
446. Defendant STEPHENSON goes into protection mode following the lawsuit.
447. All passwords are changed, and Plaintiff is denied access to Defendant STEPHENSON's daily emails.
448. Plaintiff is removed from Defendant STEPHENSON's scheduling which results in numerous errors, missed calls and appointments.
449. Plaintiff is being excluded from meetings which makes it nearly impossible for her to do her job.
450. Plaintiff asks Defendant SARUBBI what is going on and is not given any feedback.
451. Plaintiff explicitly tells Defendant SARUBBI that she is being set up to fail in the Borough because she is being excluded from essential job functions.
452. Plaintiff and Defendant SARUBBI speak to Defendant STEPHENSON who refuses to provide an explanation.
453. Plaintiff leaves the meeting even more confused.
454. Defendant STEPHENSON proceeds to change all the locks in the office and dormitory.
455. Defendant STEPHENSON, paranoidly, tells others in the Borough that people are going into his office, turning off his computer and moving items around.
456. It is common knowledge there is a short in the office that causes multiple work stations to shut down or reboot, including Defendant Stephenson's work station.
457. Defendant STEPHENSON is convinced that someone is trying to access his computer.

458. Defendant STEPHENSON is now fully unhinged.
459. Defendant STEPHENSON sits in his office with both doors closed and only comes out to speak with certain people
460. The only people allowed in Defendant STEPHENSON's office are Lieutenant Sheppard, Detective Hall, Officer Hall, Detective Rouhi, Defendant SARUBBI and Officer Johnson.
461. Following the lawsuit, Plaintiff and Sergeant Amoresano are kept completely isolated.
462. The situation continues to deteriorate.
463. Lieutenant Symister is then accused by Defendant STEPHENSON of transferring the wrong people, intentionally.
464. Lieutenant Symister and Defendant STEPHENSON get into an argument wherein she is able to prove his mistake.
465. Defendant STEPHENSON is becoming increasingly paranoid at work and spends a lot more of his time away from the office or locked behind closed doors.
466. In March and April 2025, Plaintiff and Sergeant Amoresano notice a pattern of Complaints coming out of the 4th Floor involving Lieutenant Sheppard being an absent in Operations.
467. The night before Lieutenant Sheppard was seen leaving with Defendant STEPHENSON and Officer Hall dressed to go out.
468. At one point Lieutenant Sheppard is trying to get people to sign off on eight (8) hours of overtime but everyone refuses.
469. In the beginning of April 2025, Lieutenant Sheppard drives Defendant STEPHENSON for a night out.

470. The next morning Lieutenant Sheppard is seen on video getting out of Defendant STEPHENSON vehicle in the same clothes as the night before.
471. Lieutenant Sheppard signs in that morning and then goes somewhere other than his office presumably to sleep.
472. Around this time it is rumored that Defendant STEPHENSON is a club owner in the 28th Precinct near Magic Johnson Theater.
473. In May 2025, Defendant SARUBBI alters the regular day off schedule of Borough staff without conferring with Borough Executives.
474. Plaintiff attempts to correct the immediate problems with staffing and redoes the schedule.
475. Plaintiff is tasked with filing the Executive Driver schedule and hands out the assignments in a fair manner which is then changed by Defendant SARUBBI.
476. Defendant SARUBBI informs Plaintiff that only Detective Hall or Officer Hall can drive Defendant STEPHENSON.
477. Plaintiff states that only one can drive Defendant STEPHENSON at any time and the other can drive a different Executive.
478. Plaintiff is informed that the Officer Hall and Detective Hall can only drive Defendant STEPHENSON, and one is allowed to sit around while the other drives.
479. Similarly, Defendant SARUBBI is only allowed to be driven by Officer Altadonna.
480. Defendant SARUBBI is on restricted duty at the time and rarely needs a driver, but Officer Altadonna is assigned as her driver, nevertheless.
481. The maneuvers of personnel anger the members of service in the Borough who complain to their union.

482. Defendant STEPHENSON is further angered by Plaintiff's objections.
483. Following the scheduling incident, Plaintiff is informed that Lieutenant Sheppard will supervise Detective Hall and Officer Hall from this point forward.
484. In June 2025, both Defendant STEPHENSON's drivers Detective Hall and Officer Hall are assigned to Operations to work for Lieutenant Sheppard while he is on vacation.
485. Lieutenant Symister schedules both of the drivers for the Mobile Field Force since Defendant STEPHENSON is on vacation.
486. Detective Hall and Officer Hall skip the assignment.
487. One has to be replaced, and the other does not show up for the assignment.
488. Plaintiff and Sergeant Amoresano call Defendant SARUBBI to discuss the failure to show up for work.
489. During the call Plaintiff accidentally hits the button to record the call.
490. Defendant SARUBBI accuses Plaintiff of recording her and demands that she send her the recording.
491. Plaintiff profusely apologizes, states it was an accident, and sends the recording in the group text.
492. Plaintiff accidentally send a different recording which also was accidentally taken.
493. Defendant SARUBBI goes ballistic on Plaintiff accusing her of recording regularly and stating that she cannot be trusted.
494. Plaintiff is unable to listen to the recording which she sent and asks Sergeant Amoresano to listen to it because Defendant SARUBBI is so traumatized.
495. The recording is innocuous and clearly accidental.
496. After the incident Defendant SARUBBI announces to every Executive in the Borough

that Plaintiff is recording.

497. On June 27, 2025, Plaintiff is again skipped over for promotion to Lieutenant Special Assignment.
498. Plaintiff is by far the most qualified but is passed over for the position based on unlawful retaliation.
499. The promotion is given to the number two Lieutenant on the list.
500. Plaintiff regularly performs the duties of an Operations Coordinator Lieutenant, Operations Lieutenant and Special Projects Lieutenant for the Borough.
501. The Lieutenant who receives the promotion has four separate disciplinary cases since 2022 alone but is chosen over Plaintiff for the lucrative position.
502. Plaintiff has no issues with these Lieutenants, but she is more qualified for the position and was denied these positions due to her engagement in protected activity.
503. If Plaintiff did not object to the unlawful conduct surrounding the Parties in the Borough, Plaintiff would have been promoted to Lieutenant Special Assignment.
504. If Plaintiff was having a sexual relationship with Defendant STEPHENSON, like Detective Rouhi, then she would have been promoted to Lieutenant Special Assignment.
505. If Plaintiff did not object to the unlawful disparate treatment of Detective Rouhi related to her sexual relationship with Defendant STEPHENSON then Plaintiff would have been promoted to Lieutenant Special Assignment.
506. Plaintiff is denied promotion to Lieutenant Special Assignment in retaliation for her objections to the unlawful conduct of Defendant STEPHENSON.
507. Following her denial of promotion, Plaintiff has her hours changed by Defendant SARUBBI.

508. In July 2025, Defendant SARUBBI informs Plaintiff that Officer Taveras spends three hours in the gym each day and that she must be stopped.
509. Defendant SARUBBI had previously falsely accused Officer Paniagua, and Officer Felter of gym misuse.
510. Plaintiff states she has never heard of anyone spending that long working out daily.
511. It seems clear to Plaintiff that Defendant SARUBBI is targeting women officers in the Borough.
512. Plaintiff contacts the NYPD Office of Equal Employment to formally report discrimination.
513. On July 28, 2025, a mass shooting incident takes place on the border of Patrol Borough Manhattan North at 345 Park Avenue.
514. As news of the shooting hits the NYPD, the radios are buzzing in the NYPD.
515. Plaintiff enters Defendant STEPHENSON and the Special Operations Coordinator about the active shooter situation within 10 minutes of the event occurring.
516. Defendant STEPHENSON to get up and go home for the day, completely ignored the active shooter situation which left a police officer dead.
517. Defendant STEPHENSON retaliated against Plaintiff to unlawfully deny her promotion to Lieutenant Special Assignment.
518. Defendant STEPHENSON used his position as Chief to get his girlfriend promoted Detective Rouhi promoted to Detective 1st Grade.
519. Defendant STEPHENSON used his position as Chief to get his friends promoted despite their lack of qualifications justifying their promotion.
520. Plaintiff was caused to work in hostile work environment based on gender.

521. Plaintiff was denied promotion in retaliation for her complaints of disparate treatment based on gender.
522. Plaintiff was retaliated against for her complaints of disparate treatment based on gender.
523. It appears to Plaintiff that Defendants STEPHENSON, SARUBBI and Detective Rouhi have maintained a bank account to use for their ticket sales and party business that is run on NYPD property and by the Defendant STEPHENSON using his position as Commanding Officer of Patrol Borough Manhattan North to force his subordinates to sell and buy tickets to his party.
524. At all times herein, the Defendants had a duty of care to Plaintiff to ensure that her workplace was free from harassment, ridicule, discrimination, and retaliation.
525. At all times herein, the Defendants breached their duty of care to Plaintiff to ensure that her workplace was free from harassment, ridicule, discrimination, and retaliation.
526. As a result of the Defendant breached of their duty of care, Plaintiff was harmed.
527. At all times herein, Plaintiff was a member of a protected class in that she was a woman.
528. At all times herein, Plaintiff was a member of a protected class in that she objected to favorable treatment on the basis of sex in the work place. .
529. At all times herein, Plaintiff was a member of a protected class in that she objected to favorable treatment on the basis of gender in the work place.
530. Plaintiff was retaliated against for her objections to favorable treatment on the basis of sex.
531. Each time Plaintiff objected to Defendants STEPHENSON and SARUBBI 's collection of money on NYPD time—or to any aspect of the events that Defendants

STEPHENSON and SARUBBI orchestrated, planned, executed, and financed—Plaintiff engaged in protected activity under New York Civil Service Law § 75-b. This includes Plaintiff's objections to Defendant STEPHENSON's solicitation of donations from community businesses, both directly and from his NYPD desk, at Defendant STEPHENSON's direction.

532. Plaintiff was caused to suffer harm worse than petty slights a trivial inconveniences as a result of her engagement in protected activity.
533. At all times herein, Plaintiff was qualified for her position as a Lieutenant with the NYPD, and she excelled in her role.
534. At all times herein, Plaintiff was qualified for promotion Lieutenant Special Assignment within the NYPD, but was denied that promotion due to unlawful retaliation.
535. Plaintiff was denied employment benefits, harassed, subjected to ridicule and embarrassment when she was retaliated against by Defendants STEPHENSON and SARUBBI .
536. Plaintiff engaged in protected activity from 2023 until the present date when she objected to the favorable treatment of Detective Rouhi who was being given favorable treatment due to her sexual relationship with Defendant STEPHENSON.
537. Following her objections to the disparate treatment based on sex by Defendant STEPHENSON, Plaintiff was retaliated against.
538. The actions taken against Plaintiff were done purposefully to dissuade others from engaging in protected activity.
539. The retaliation continues to date.
540. At all times herein, Plaintiff was subjected to a hostile work environment as she was

treated less well than others due to her gender and sex.

541. As a result of the aforementioned, Plaintiff has suffered severe emotional distress.

542. The Defendants failure to evaluate Plaintiff is unique to her as everyone else in the Borough receives an annual evaluation.

543. This is being done in retaliation for Plaintiff's objections to Defendant STEPHENSON.

544. The Defendant CITY and Plaintiff's supervisors knew or should have known of the sexual harassment dating back to 2023 yet failed to take remedial action which subjected Plaintiff to further sexual harassment and retaliation.

545. Despite knowing about the disparate treatment based on gender discrimination, unlawful conduct and retaliation the Defendants failed to take remedial measures to stop the unlawful actions of the Defendants herein.

546. By failing to take remedial action following knowledge of the misconduct, Defendant CITY condoned and acquiesced to the discriminatory conduct.

547. As a result of the knowledge by upper management of the conduct of Plaintiff's supervisors retaliating against her and their failure to take remedial action, liability is imputed to Defendant CITY.

548. The actions that Plaintiff was forced to endure, from her supervisors, verbal discipline following Plaintiff's inability to complete assignments that required access to her work, and the thwarting of promotional opportunities created a hostile work environment for Plaintiff.

549. These actions by the Defendants herein which caused the hostile work environment for Plaintiff were severe and pervasive.

550. As a result of Defendant CITY being on notice of the misconduct complained of herein

back to 2023, and subsequently failed to take prompt and effective remedial action and/or that the Defendant CITY should have known and failed to exercise reasonable diligence to prevent future acts, the Defendants are strictly liable to Plaintiff pursuant to New York City Human Rights Law (hereinafter referred to as “NYCHRL”) §8-107(13)(b).

551. As a result of the Defendants failure to prevent the discriminatory atmosphere in which Plaintiff was subjected, the intentional, malicious, and reckless indifference that resulted in discrimination and retaliation of Plaintiff, Defendants are subjected to punitive damages in this action.
552. The Defendants failure to intervene and protect Plaintiff, despite knowing that employment discrimination and retaliation to be unlawful which is common knowledge in today’s society that employment discrimination and retaliation is impermissible Plaintiff is entitled to an award of punitive damages.
553. The Defendants egregious misconduct is evidence of the Defendants mental state of intentional discrimination and retaliation.
554. Plaintiff engaged in protected activity when she objected to the disparate treatment on the basis of gender by Defendants STEPHENSON and SARUBBI .
555. The Defendants herein were aware of that Plaintiff participated in protected activity when objected to the disparate treatment of Detective Rouhi by Defendants STEPHENSON and SARUBBI due to their romantic relationship.
556. As a result of this protected activity, Plaintiff was subjected to retaliation that would dissuade others who are facing sexual harassment, gender and/or sex discrimination from engaging in protecting activity.

557. Plaintiff suffered disadvantageous employment actions, petty slights, and trivial inconveniences when she was denied promotional opportunities and labeled a problem by the Defendants herein.
558. Plaintiff suffered more than petty slights and trivial inconveniences as a result of the discriminatory and retaliatory actions of the Defendants herein.
559. Plaintiff alleges that the actions of the defendants herein caused her to suffer severe and pervasive emotional distress as a result of that hostile environment.

COUNT I
RETALIATION
STRICT LIABILITY IN VIOLATION OF
NEW YORK CITY ADMINISTRATIVE CODE § 8-107(13)(b)
AGAINST ALL DEFENDANTS

560. Plaintiff re-alleges all paragraphs contained herein and incorporates them by reference of Count I of this complaint.
561. Plaintiff alleges that New York City Administrative Code § 8-107 (13) (b), makes a Defendant strictly liable for the acts of managers and supervisors against a subordinate employee, such as the Plaintiff herein.
562. Plaintiff was subjected to repeated retaliatory acts following the lawful complaints made by Plaintiff regarding sex and gender discrimination.
563. The Defendant CITY OF NEW YORK was aware of the actions of managers and supervisors, including Defendants CITY, STEPHENSON and SARUBBI. The Defendants failed to exercise reasonable diligence to prevent such retaliatory conduct.
564. Plaintiff performed her job duties satisfactorily which is reflected in Plaintiffs stellar performance evaluations and numerous commendations. Nevertheless, Defendants denied Plaintiff benefits of employment, including all favorable conditions and

emoluments thereof because of Plaintiff's gender, sexual harassment, and created a hostile work environment by the conduct of Defendants CITY, STEPHENSON and SARUBBI, and without any non-discriminatory basis thereof. The wrongful conduct was condoned by the Defendant CITY.

565. Defendants' actions were taken under circumstances giving rise to an inference of retaliation.

566. The direct and proximate cause of Defendants' recklessness and negligence, Plaintiff suffered adverse employment actions which could include but are not limited to losing her position, denied promotion, suffered lost past and future wages, lost other valuable benefits and emoluments of employment, lost career, and business opportunities, suffered severe damage to her good name and reputation, and endured severe emotional pain and trauma, all to her detriment due to the unlawful actions of the Defendants herein.

567. Plaintiff alleges Defendants CITY, STEPHENSON and SARUBBI, engaged in various unlawful employment actions against Plaintiff in retaliation for her lawfully protected complaints of sex and gender discrimination.

568. At all times herein Defendants STEPHENSON, was a supervisor of Plaintiff.

569. Plaintiff alleges that as a direct and proximate result of the unlawful employment practices of Defendants CITY, STEPHENSON and SARUBBI, Plaintiff incurred significant legal costs, back pay, front pay, compensatory damages, punitive damages, attorneys' fees, emotional distress, and damage to her personal and professional reputation.

570. As a result of Defendants willful actions, they are strictly liable to Plaintiff for their

actions.

COUNT II
RETALIATION
IN VIOLATION OF NEW YORK CITY
ADMINISTRATIVE CODE § 8-107
AGAINST ALL DEFENDANTS

571. Plaintiff re-alleges all paragraphs herein and incorporates them by reference in Count II of this complaint.
572. Plaintiff alleges that New York City Administrative Code § 8-107, makes it unlawful to deny employment in retaliation for Plaintiff engaging in protected activity.
573. Plaintiff engaged in protected activity when she complained of sex, gender and pregnancy discrimination related to the sexual harassment.
574. Plaintiff was retaliated against by the Defendants CITY, STEPHENSON and SARUBBI, as a result of her engagement in protected activity.
575. Defendants' actions were taken under circumstances giving rise to an inference of retaliation.
576. The direct and proximate cause of Defendants' recklessness and negligence, Plaintiff suffered the following adverse actions which include but are not limited to lost significant income, denied promotion. suffered lost past and future wages, lost other valuable benefits and emoluments of employment, hurt her credit rating, lost career, and business opportunities, suffered severe damage to her good name and reputation, and endured severe emotional pain and trauma, all to her detriment.
577. Plaintiff alleges Defendants CITY, STEPHENSON and SARUBBI, engaged in various unlawful employment actions against Plaintiff in retaliation for Plaintiff's lawfully protected complaints.
578. Plaintiff alleges that as a direct and proximate result of the unlawful employment

practices of Defendants CITY, STEPHENSON and SARUBBI, Plaintiff incurred significant legal costs, back pay, front pay, compensatory damages, punitive damages, attorneys' fees, emotional distress, and damage to his personal and professional reputation.

COUNT III
RETALIATION
IN VIOLATION OF NEW YORK
STATE EXECUTIVE LAW § 296
AGAINST ALL DEFENDANTS

579. Plaintiff re-alleges all paragraphs herein and incorporates them by reference in Count III of this complaint.
580. Plaintiff alleges that New York State Executive Law §296, makes it unlawful to deny employment and benefits therein in retaliation for Plaintiff engaging in lawfully protected activity.
581. Plaintiff engaged in protected activity when she complained of sex, gender and pregnancy discrimination related to the sexual harassment.
582. Plaintiff was retaliated against by the Defendants CITY, STEPHENSON and SARUBBI, as a result of her engagement in protected activity.
583. Defendants' actions were taken under circumstances giving rise to an inference of retaliation.
584. The direct and proximate cause of Defendants' recklessness and negligence, Plaintiff suffered the following adverse actions which include but are not limited to lost significant income, denied promotion. suffered lost past and future wages, lost other valuable benefits and emoluments of employment, hurt her credit rating, lost career, and business opportunities, suffered severe damage to her good name and reputation, and endured severe emotional pain and trauma, all to her detriment.

585. Plaintiff alleges Defendants CITY, STEPHENSON and SARUBBI, engaged in various unlawful employment actions against Plaintiff in retaliation for Plaintiff's lawfully protected complaints.

586. Plaintiff alleges that as a direct and proximate result of the unlawful employment practices of Defendants CITY, STEPHENSON and SARUBBI, Plaintiff incurred significant legal costs, back pay, front pay, compensatory damages, attorneys' fees, emotional distress, and damage to his personal and professional reputation.

COUNT IV

VIOLATION OF NEW YORK STATE CIVIL SERVICE LAW §75-B **(AGAINST DEFENDANT CITY OF NEW YORK)**

587. Plaintiff repeats and re-alleges all the allegations contained in all preceding paragraphs of this complaint with full force and effect as though set forth at length herein.

588. The Defendants retaliated against Plaintiff for engaging in protected activity in violation of New York State Civil Service Law §75.

589. Specifically Plaintiff engaged about protected activity when he complained about the illegal actions of the several co-workers in his unit.

590. In retaliation for those complaints, Plaintiff was retaliated against.

591. Plaintiff hereby demands compensatory and punitive damages against defendants in an amount to be proven at trial that exceeds the jurisdictional limitations of all lower courts that would otherwise have jurisdiction against each of the defendants, individually and severally.

592. Civil Service Law § 75-b provides, in pertinent part: "A public employer shall not dismiss or take other disciplinary or other adverse personnel action against a public employee regarding the employee's employment because the employee discloses to a governmental body information: (i) regarding a violation of a law, rule or regulation which violation creates and presents a substantial and specific danger to the public health or safety; or (ii) which the

employee reasonably believes to be true and reasonably believes constitutes an improper governmental action.

593. "Improper governmental action" shall mean any action by a public employer or employee, or an agent of such employer or employee, which is undertaken in the performance of such agent's official duties, whether or not such action is within the scope of his employment, and which is in violation of any federal, state or local law, rule or regulation.
594. Upon receiving Plaintiff's multiple complaints of corruption related to the misconduct surrounding the parties wherein Officers were forced to solicit donations on duty for the Defendants financial gain and various other criminal conduct complained of herein. The misconduct was made several law enforcement officials and known to Plaintiff, Defendant retaliated against Plaintiff as a public employee. Plaintiff filed several reports that attempted to redress Defendant's corrupt practices as described herein.
595. These acts as defined by Civil Service Law § 75-b are classified as improper governmental action by a public employee. Plaintiff filed these complaints based on tangible evidence that caused her to reasonably believe Defendant engaged in improper governmental action.
596. As a result of the foregoing, Plaintiff's career is irreparably damaged, and she sustained serious emotional distress and financial harm.
597. As a result of Defendant CITY OF NEW YORK's willful actions they are liable to Plaintiff for their actions.

COUNT V
SEX/GENDER DISCRIMINATION
STRICT LIABILITY IN VIOLATION OF
NEW YORK CITY ADMINISTRATIVE CODE § 8-107(13)(b)
AGAINST ALL DEFENDANTS

598. Plaintiff re-alleges all paragraphs herein and incorporates them by reference in Count I of this complaint.
599. Plaintiff alleges that New York City Administrative Code § 8-107 (13) (b), makes a

Defendant strictly liable for the discriminatory acts of managers and supervisors against a subordinate employee, such as the Plaintiff herein.

600. Defendants subjected Plaintiff to a materially adverse and hostile working conditions by subjecting employees to disparate treatment because they are not in a sexual relationship with Defendant STEPHENSON.

601. This hostile work environment occurred day after day and year after year, without supervisory intervention to discrimination and retaliation based on her sex and gender.

602. The actions of the Defendants towards Plaintiff were severe and pervasive.

603. The Defendants were aware of the actions of managers and supervisors, including Defendants CITY, STEPHENSON and SARUBBI, but failed to take corrective remedial action which forced Plaintiff to be subjected to future sexual harassment, sexual assault and repeated comments involving sex.

604. The Defendants failed to exercise reasonable diligence to prevent such discriminatory conduct.

605. Plaintiff performed her job duties satisfactorily which is reflected in Plaintiffs stellar performance evaluations. Nevertheless, Defendants denied Plaintiff benefits of employment, including all favorable conditions and emoluments thereof because of Plaintiff's gender, sex, sexual harassment, created a hostile work environment by the conduct of Defendants CITY, STEPHENSON and SARUBBI and without any non-discriminatory basis thereof. The wrongful conduct was condoned by the Defendant CITY.

606. Defendants' actions were taken under circumstances giving rise to an inference of discrimination.

607. The direct and proximate cause of Defendants' recklessness and negligence, Plaintiff suffered

the following adverse actions which include but are not limited to lost significant income, denied promotion. suffered lost past and future wages, lost other valuable benefits and emoluments of employment, hurt her credit rating, lost career, and business opportunities, suffered severe damage to her good name and reputation, and endured severe emotional pain and trauma, all to her detriment.

608. Plaintiff alleges Defendants CITY, STEPHENSON and SARUBBI, engaged in various unlawful employment actions against Plaintiff based on her sex and gender.
609. Plaintiff alleges that as a direct and proximate result of the unlawful employment practices of Defendants CITY, STEPHENSON and SARUBBI, Plaintiff incurred significant legal costs, back pay, front pay, compensatory damages, punitive damages, attorneys' fees, emotional distress, and damage to his personal and professional reputation.
610. As a result of Defendants willful actions, they are strictly liable to Plaintiff for their actions.

COUNT VI
**SEX/GENDER DISCRIMINATION/
HOSTILE WORK ENVIRONMENT
STRICT LIABILITY IN VIOLATION OF
NEW YORK CITY ADMINISTRATIVE CODE § 8-107(13)(b)
AGAINST ALL DEFENDANTS**

611. Plaintiff re-alleges all paragraphs herein and incorporates them by reference in Count II of this complaint.
612. Plaintiff alleges that New York City Administrative Code § 8-107 (13) (b), makes a Defendant strictly liable for the acts of managers and supervisors against a subordinate employee, such as the Plaintiff herein.
613. Plaintiff was subjected to repeated retaliatory acts following the lawful complaints made

by Plaintiff regarding sex, gender discrimination and sexual harassment.

614. The Defendants were aware of the actions of managers and supervisors, including Defendants CITY, STEPHENSON and SARUBBI, but failed to take corrective remedial action which forced Plaintiff to be subjected to future retaliation.
615. The Defendants failed to exercise reasonable diligence to prevent such retaliatory conduct.
616. Plaintiff performed her job duties satisfactorily which is reflected in Plaintiffs stellar performance evaluations. Nevertheless, Defendants denied Plaintiff benefits of employment, including all favorable conditions and emoluments thereof because of Plaintiff's gender, sex, sexual harassment, created a hostile work environment by the conduct of Defendants CITY, STEPHENSON and SARUBBI and without any non-discriminatory basis thereof. The wrongful conduct was condoned by the Defendant CITY.
617. Defendants' actions were taken under circumstances giving rise to an inference of retaliation.
618. The direct and proximate cause of Defendants' recklessness and negligence, Plaintiff suffered the following adverse actions which include but are not limited to lost significant income, denied promotion. suffered lost past and future wages, lost other valuable benefits and emoluments of employment, hurt her credit rating, lost career, and business opportunities, suffered severe damage to her good name and reputation, and endured severe emotional pain and trauma, all to her detriment.
619. Plaintiff alleges Defendants CITY, STEPHENSON and SARUBBI, engaged in various unlawful employment actions against Plaintiff in retaliation for her lawfully protected complaints of sex, gender discrimination and sexual harassment.

620. Plaintiff alleges that as a direct and proximate result of the unlawful employment practices of Defendants CITY, STEPHENSON and SARUBBI, Plaintiff incurred significant legal costs, back pay, front pay, compensatory damages, punitive damages, attorneys' fees, emotional distress, and damage to his personal and professional reputation.
621. As a result of Defendants willful actions, they are strictly liable to Plaintiff for their actions.

COUNT IX
SEX/GENDER DISCRIMINATION
IN VIOLATION OF NEW YORK CITY
ADMINISTRATIVE CODE § 8-107
AGAINST ALL DEFENDANTS

622. Plaintiff re-alleges all paragraphs herein and incorporates them by reference in Count VII of this complaint.
623. Plaintiff alleges that New York City Administrative Code § 8-107, makes it unlawful to deny employment on the basis of her sex and gender.
624. Plaintiff performed her job duties satisfactorily which is reflected in Plaintiffs stellar performance evaluations. Nevertheless, Defendants denied Plaintiff benefits of employment, including all favorable conditions and emoluments thereof because of Plaintiff's gender, sex, sexual harassment, created a hostile work environment by the conduct of Defendants CITY, STEPHENSON and SARUBBI without any non-discriminatory basis thereof. The wrongful conduct was condoned by the Defendant CITY.
625. Defendants' actions were taken under circumstances giving rise to an inference of discrimination.

626. The direct and proximate cause of Defendants' recklessness and negligence, Plaintiff suffered the following adverse actions which include but are not limited to lost significant income, denied promotion. suffered lost past and future wages, lost other valuable benefits and emoluments of employment, hurt her credit rating, lost career, and business opportunities, suffered severe damage to her good name and reputation, and endured severe emotional pain and trauma, all to her detriment.
627. Plaintiff alleges Defendants CITY, STEPHENSON and SARUBBI, engaged in various unlawful employment actions against Plaintiff based on her sex and gender.
628. Plaintiff alleges that as a direct and proximate result of the unlawful employment practices of Defendants CITY, STEPHENSON and SARUBBI, Plaintiff incurred significant legal costs, back pay, front pay, compensatory damages, punitive damages, attorneys' fees, emotional distress, and damage to his personal and professional reputation.

COUNT VIII
SEX/GENDER DISCRIMINATION
HOSTILE WORK ENVIRONMENT
IN VIOLATION OF NEW YORK CITY
ADMINISTRATIVE CODE § 8-107
AGAINST ALL DEFENDANTS

629. Plaintiff re-alleges all paragraphs herein and incorporates them by reference in Count VIII of this complaint.
630. Plaintiff alleges that New York City Administrative Code § 8-107, makes it unlawful to deny employment on the basis of her sex and gender.
631. Plaintiff performed her job duties satisfactorily which is reflected in Plaintiffs stellar performance evaluations. Nevertheless, Defendants denied Plaintiff benefits of employment, including all favorable conditions and emoluments thereof because of

Plaintiff's gender, sex, sexual harassment, created a hostile work environment by the conduct of Defendants CITY, STEPHENSON and SARUBBI and without any non-discriminatory basis thereof. The wrongful conduct was condoned by the Defendant CITY.

632. Defendants' actions were taken under circumstances giving rise to an inference of discrimination.
633. Defendants subjected Plaintiff to a materially adverse and hostile working conditions by subjecting employees to disparate treatment because they are not in a sexual relationship with Defendant STEPHENSON.
634. This hostile work environment occurred day after day and year after year, without supervisory intervention to discrimination and retaliation based on her sex and gender.
635. The actions of the Defendants towards Plaintiff were severe and pervasive.
636. The direct and proximate cause of Defendants' recklessness and negligence, Plaintiff suffered the following adverse actions which include but are not limited to lost significant income, denied promotion. suffered lost past and future wages, lost other valuable benefits and emoluments of employment, hurt her credit rating, lost career, and business opportunities, suffered severe damage to her good name and reputation, and endured severe emotional pain and trauma, all to her detriment.
637. Plaintiff alleges Defendants CITY, STEPHENSON and SARUBBI, engaged in various unlawful employment actions against Plaintiff based on her sex and gender.
638. Plaintiff alleges that as a direct and proximate result of the unlawful employment practices, including subjecting Plaintiff to a hostile work environment, of Defendants CITY, STEPHENSON and SARUBBI, Plaintiff incurred significant legal costs, back pay, front pay, compensatory damages, punitive damages, attorneys' fees, emotional

distress, and damage to his personal and professional reputation.

JURY TRIAL

639. Plaintiff demands a trial by jury of all issues in this action that are so triable.

**PRAYER
FOR RELIEF**

WHEREFORE, Plaintiff respectfully request that the Court:

- a. Injunctive relief to promote Plaintiff to Lieutenant Special Assignment;
- b. Award compensatory damages for the back pay, front pay, pain, suffering, emotional distress, loss of dignity, humiliation, and damages to reputation and livelihood endured by Plaintiff and all other damages afforded to Plaintiff by statute or otherwise in an amount to be determined at trial.
- c. Award Plaintiff punitive damages in an amount to be determined at trial New York City Human Rights Law Administrative Code §8-502(a).
- d. Find Defendants strictly liable pursuant to New York City Human Rights Law Administrative Code §8-107(13)(b).

- Dated: August 6, 2025
New York, NY

By: /s/
John Scola

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

VERIFICATION

STATE OF NEW YORK)
COUNTY OF NEW YORK)

I, the undersigned, an attorney duly admitted to practice law in the State of New York, under penalties of perjury do affirm.

That I am the attorney of record for the plaintiff in the within matter and make this affirmation in accordance with CPLR 3020. I have read the within VERIFIED COMPLAINT and know the contents thereof to be true to your affirmant's own knowledge, with the exception of those matters therein stated to be alleged upon information and belief. Your affirmant bases her belief regarding those matters upon the contents of the file and conversation with witnesses and the claimant.

This verification is made by your affirmant and not by the claimant for the following reason: The claimants resides in a different County than where your affirmant maintains an office.

Dated: New York, New York
August 6, 2025

/s/
JOHN SCOLA