

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SALVATORE J. GRECO

COMPLAINT

JURY DEMAND

Plaintiff,

-against-

THE CITY OF NEW YORK, ERIC L. ADAMS,  
ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA  
S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and  
JOHN DOES 1-5

Defendants

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The Plaintiff SALVATORE J. GRECO through his attorney The Sanders Firm, P.C., files this federal complaint against Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1-5 respectfully set forth and allege that:

**INTRODUCTION**

This is a civil-rights retaliation and employment-retaliation action for declaratory and equitable relief, compensatory damages, punitive damages (where available), attorneys' fees, and costs, brought by Plaintiff SALVATORE J. GRECO against Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1-5.

Plaintiff SALVATORE J. GRECO alleges that, from the initiation of his prior federal action through the present, Defendants engaged in a coordinated and escalating campaign of retaliation in response to Plaintiff's protected speech, petitioning activity, political expression, and associational conduct, including his public anti-corruption reporting through "*The Sal Greco Show*" and related

platforms.

Plaintiff SALVATORE J. GRECO further alleges that Defendants used both formal and informal governmental channels—including monitoring, intimidation, reputational targeting, employment interference, and credential-related status actions—to impose punitive consequences under the guise of administrative process, thereby chilling protected activity and increasing the personal and professional cost of continued litigation and public criticism. This action is brought under 42 U.S.C. § 1983 and related federal and New York anti-retaliation law to remedy that continuing pattern of unconstitutional and unlawful conduct.

#### **JURISDICTION AND VENUE**

1. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331 and 1343 because this action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983, and seeks redress for deprivations of federally protected rights under color of state law. Plaintiff further seeks declaratory and additional relief pursuant to 28 U.S.C. §§ 2201 and 2202.

2. This Court has supplemental jurisdiction over Plaintiff's related state and local claims, including claims under the New York State Human Rights Law (N.Y. Exec. Law § 296) and the New York City Human Rights Law (N.Y.C. Admin. Code § 8-107), pursuant to 28 U.S.C. § 1337 because those claims arise from the same nucleus of operative facts, including a continuing course of retaliatory conduct connected to Plaintiff's employment, separation, credential-related actions, and post-separation treatment.

3. Venue is proper in this District under 28 U.S.C. § 1331(b) because a substantial part of the events and omissions giving rise to the claims occurred in this District, and one or more Defendants reside in this District for venue purposes. To the extent related acts occurred in

the Southern District of New York, the District of Columbia, or the Southern District of Florida, such acts form part of the same continuing retaliatory pattern and are properly pleaded as part of the factual basis for relief in this Court.

**PROCEDURAL REQUIREMENTS**

4. Plaintiff has commenced this action within all applicable limitations' periods, including under the continuing-violation and accrual principles applicable to Plaintiff's federal, state, and city retaliation claims, based on retaliatory acts and consequences that continued into the actionable period.

5. Plaintiff is not required to exhaust administrative remedies before filing suit on his claims under 42 U.S.C. § 1983, NYSHRL and NYCHRL. Plaintiff separately pleads related NYSHRL and NYCHRL claims to the extent based on the same continuing retaliatory course of conduct.

**PLAINTIFF**

6. Plaintiff SALVATORE J. GRECO is a male citizen of the United States of America, over twenty-one (21) years of age, a former member of the NYPD and resident of the state of Florida.

**DEFENDANTS**

7. Defendant THE CITY OF NEW YORK, is a municipal corporation and public employer, duly incorporated pursuant to the laws of the State of New York with its principal place of business located within the County of New York.

8. Defendant ERIC L. ADAMS is sued in his individual capacity and, for relevant periods, in his former official capacity as Mayor of the City of New York.

9. Defendant ANTHONY L. HERBERT is sued in his individual capacity, and, for relevant periods, in his former official capacity as Citywide Public Housing Liaison in the Mayor's Office.

10. Defendant KAZ DAUGHTRY is sued in his individual capacity and, for relevant periods, in his former official capacity as former Deputy Mayor for Public Safety and NYPD Deputy Commissioner of Operations.

11. Defendant JESSICA S. TISCH is sued in her individual capacity and official capacity as NYPD Police Commissioner.

12. Defendant JOHN M. CHELL is sued in his individual capacity and, for relevant periods, in his former official capacity as NYPD Chief of Department.

13. Defendant RAJUB K. BHOWMIK is sued in his individual capacity and, for all relevant periods, in his official capacity as an NYPD Lieutenant and as an emissary of the "Table of Success," including in coordination with Defendant KAZ DAUGHTRY.

14. Defendants JOHN DOES 1–5 are persons presently unknown who acted under color of state law and/or in concert with City Hall and NYPD personnel.

### **BACKGROUND**

#### **A. The City of New York (General)**

15. Plaintiff SALVATORE J. GRECO has continuously maintained a pending federal civil-rights action in the United States District Court for the Eastern District of New York, Docket No. 22-cv-5109, before Senior District Judge Frederic Block, from the date of filing of August 22, 2022, through the present.

16. From the commencement of that federal action forward, Plaintiff SALVATORE J. GRECO engaged in sustained public-interest speech, including by hosting "*The Sal Greco*

*Show*” and publishing related social-media content addressing alleged public corruption, institutional favoritism, and misconduct within federal, state, and local government, particularly the Office of the Mayor, the City of New York, and the NYPD.

17. Plaintiff SALVATORE J. GRECO publicly addressed the “Con Sofrito” controversy and related allegations involving federal, state, and local government officials, particularly officials in the Office of the Mayor, the City of New York, and NYPD leadership, as part of his continuing public-accountability reporting.

18. Plaintiff SALVATORE J. GRECO alleges that, across the life of his pending federal case, Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5, and/or persons acting in concert with them, engaged in a pattern of litigation-era pressure and extra-judicial retaliation—including threats, intimidation, harassment, coordinated online attacks, and monitoring—directed at Plaintiff because of his protected speech and because he continued litigating against City actors.

19. Plaintiff SALVATORE J. GRECO alleges this pattern functioned as litigation gamesmanship: conduct designed to raise the personal and professional cost of pursuing his EDNY case, to discredit him in public, and to chill his ongoing reporting while his claims remained before the Court.

20. Plaintiff SALVATORE J. GRECO alleges that this retaliatory pattern included reputational targeting and employment interference after termination, including rejection from positions that remained publicly posted, thereby compounding the burdens imposed during the pendency of his federal action.

21. During the administration of Defendant ERIC L. ADAMS, the Office of the Mayor along with several mayoral agencies and public benefit corporations were repeatedly the subject of publicly reported and/or publicly announced corruption investigations, which became a central subject matter of Plaintiff SALVATORE J. GRECO's protected commentary.

22. On February 29, 2024, federal agents executed searches against Winnie Greco, identified as a prolific fundraiser for Defendant ERIC L. ADAMS, and part of the "Table of Success," including locations publicly reported as her Bronx residences and New World Mall in Queens.

23. On September 26, 2024, the United States Attorney for the Southern District of New York ("SDNY") publicly announced the unsealing of an indictment charging then-Defendant ERIC L. ADAMS with conspiracy, wire fraud, two counts of soliciting campaign contributions from foreign nationals, and one count of soliciting and accepting a bribe.

24. SDNY publicly stated that the ADAMS matter was assigned to United States District Judge Dale E. Ho and that the charges were accusations, with Defendant ERIC L. ADAMS presumed innocent unless and until proven guilty.

25. On September 27, 2024, Ingrid Lewis-Martin, a close ally and former chief adviser to Defendant ERIC L. ADAMS, was publicly reported to have had her cellular telephone seized and to have been served with a subpoena upon returning from Japan.

26. On October 8, 2024, Mohamed Bahi, identified as Defendant ERIC L. ADAMS'S former Chief Liaison to the Muslim Community, was arrested and charged with witness tampering and destruction of evidence in connection with ADAMS-related investigative activity.

27. Plaintiff SALVATORE J. GRECO publicly commented on the foregoing investigative developments and their implications for integrity, accountability, and public trust in municipal governance and policing institutions.

28. Plaintiff SALVATORE J. GRECO alleges that these developments intensified, rather than diminished, his corruption-focused reporting and that retaliatory responses to his speech escalated during the same litigation period.

29. On December 15, 2024, Ingrid Lewis-Martin resigned from City Hall, as publicly reported in coverage of ongoing investigations.

30. In December 2024, the Manhattan District Attorney's Office charged Ingrid Lewis-Martin in an alleged bribery conspiracy, as later reflected in subsequent public prosecutorial releases.

31. On January 2, 2025, federal law-enforcement officials executed searches/raids tied to former NYPD Chief of Department Jeffrey B. Maddrey, including his residence, and he was publicly reported as suspended without pay the same day.

32. Plaintiff SALVATORE J. GRECO publicly commented on the Maddrey raid/suspension and its relevance to NYPD command-level accountability, public-corruption oversight and the alleged quid pro case involving former Lieutenant Quathisha Epps.

33. On February 10, 2025, United States Department of Justice (DOJ) instructed federal prosecutors to drop charges against Defendant ERIC L. ADAMS, and public reporting described subsequent resignations by federal public-integrity personnel.

34. On April 2, 2025, United States District Judge Dale E. Ho dismissed the case against Defendant ERIC L. ADAMS with prejudice; public reporting further stated that dismissal

did not adjudicate guilt or innocence on the merits and reflected the court's inability to compel prosecution.

35. Plaintiff SALVATORE J. GRECO publicly commented on those events and on their implications for political accountability and public confidence in anti-corruption enforcement.

36. On August 21, 2025, the Manhattan District Attorney and the Department of Investigation (DOI) announced new indictments charging Ingrid Lewis-Martin with accepting more than \$75,000 in bribes, including \$50,000 in cash directed to her son's account, in alleged conspiracies spanning March 2022 through November 2024.

37. That August 21, 2025 announcement further alleged that the charged conspiracies affected multiple City agencies, including DOB, FDNY, DOT, DCAS, and HPD, and included allegations concerning steering contracts, expedited approvals, interference with agency determinations, and benefits directed to Lewis-Martin and/or her son.

38. Plaintiff SALVATORE J. GRECO publicly discussed those allegations—including allegations concerning Lewis-Martin's son—as part of his ongoing reporting on systemic corruption risk and oversight failures in City government.

39. On January 13, 2026, SDNY publicly announced charges against Defendant ANTHONY L. HERBERT, former Citywide Public Housing Liaison in the Mayor's Office, another ally of Defendant ERIC L. ADAMS, alleging bribery, kickback, and fraud offenses, and stated that the charges were accusations with a presumption of innocence.

40. Plaintiff SALVATORE J. GRECO publicly discussed the HERBERT prosecution, together with the Winnie Greco, Ingrid Lewis-Martin, and Jeffrey B. Maddrey and

others investigative timeline, as further evidence of systemic corruption risk within City government and related oversight failures.

41. Plaintiff SALVATORE J. GRECO alleges that, from the filing of his EDNY action through the present day, Defendants KAZ DAUGHTRY, JOHN M. CHELL, and RAJUB K. BHOWMIK, acting directly and/or through NYPD social-media accounts, proxy accounts, and pseudonymous accounts, together with Defendant JESSICA S. TISCH through NYPD resources—including personnel and functions of the NYPD Legal Bureau—monitored and tracked Plaintiff’s reporting activity, including “*The Sal Greco Show*,” as well as the show’s guests and viewers, and tracked Plaintiff’s speech across multiple social-media platforms.

42. Plaintiff SALVATORE J. GRECO alleges that such monitoring was operationalized to facilitate retaliatory targeting, to amplify intimidation during active litigation, and to chill Plaintiff’s continued speech, petitioning activity, and prosecution of his pending federal claims.

**B. Mayor’s Office, Mayoral Agencies, and Public Benefit Corporations: Public-  
Corruption Commentary and Retaliation to Chill Plaintiff’s Speech and Federal  
Litigation**

**I. Incorporation and Protected Commentary Framework**

43. From the filing of Plaintiff’s EDNY action through the present, Plaintiff SALVATORE J. GRECO engaged in sustained public commentary concerning Defendant ERIC L. ADAMS, City Hall operations, mayoral agencies, public benefit corporations, and corruption-related developments tied to the Office of the Mayor, including through social media platforms and *The Sal Greco Show*.

44. Plaintiff SALVATORE J. GRECO alleges that this protected commentary addressed public corruption, favoritism, ethics failures, procurement irregularities, enforcement

disparities, and command-level accountability, and that Defendants and their affiliates treated Plaintiff's reporting as adverse political pressure to be contained, discredited, and chilled during the pendency of Plaintiff's federal litigation.

**II. Institutional Architecture of the “Table of Success” (August 2022 Forward)**

45. On or about August 22, 2022, contemporaneous with Plaintiff's initial federal filing, Plaintiff SALVATORE J. GRECO alleges that the Office of the Mayor, through then-Commissioner Keechant Sewell, ratified Plaintiff's termination for “association” with a legal political figure, while simultaneously maintaining a “Table of Success” structure that shielded inner-circle officials from comparable discipline for more serious, including criminally investigated, conduct.

46. Plaintiff SALVATORE J. GRECO alleges the “Table of Success” was not a neutral governance model, but a deliberate architecture of patronage designed to centralize executive authority within a cadre of loyalists while bypassing municipal ethical guardrails, including Conflict-of-Interest Board (COIB)-facing controls and ordinary accountability channels.

47. Plaintiff SALVATORE J. GRECO alleges the architecture was rooted in shared NYPD and Brooklyn political-machine relationships, prioritized personal fealty over compliance, and created a permissive environment for circumvention of ethics oversight.

48. Plaintiff SALVATORE J. GRECO alleges that this inner circle operated with substantial autonomy and transformed city agencies into vehicles for private enrichment and loyalty preservation while maintaining outward narratives of reform.

49. Plaintiff SALVATORE J. GRECO alleges that appointments of officials with known ethical exposure served as functional predicates for the transactional corruption that later culminated in the first federal indictment of a sitting New York City mayor.

50. Plaintiff SALVATORE J. GRECO identifies core loyalists of this structure as including, *inter alia*: Frank Carone (Chief of Staff), Philip Banks III (Deputy Mayor for Public Safety), David C. Banks (Schools Chancellor), Ingrid Lewis-Martin (Chief Advisor), Jesse Hamilton (Deputy Commissioner, DCAS), Eric Ulrich (Buildings Commissioner), and Sheena Wright (First Deputy Mayor).

51. Plaintiff SALVATORE J. GRECO alleges the eventual resignations and/or indictments associated with this group are consistent with Plaintiff's public-corruption reporting timeline and not with neutral-governance narratives advanced by Defendants.

### **III. Chronology of Public Corruption Reporting by Plaintiff and Escalating Pressure (2022–2026)**

52. During the pendency of Plaintiff's EDNY action, Plaintiff SALVATORE J. GRECO publicly addressed and criticized corruption-related developments involving City Hall, mayoral agencies, and public benefit corporations, including by publishing chronology-based commentary through *The Sal Greco Show* and associated social media posts.

53. Plaintiff SALVATORE J. GRECO alleges that, as his public reporting intensified and reached wider audiences, retaliatory signals, online hostility, discrediting campaigns, and litigation-era pressure escalated in parallel.

54. Plaintiff SALVATORE J. GRECO alleges this pattern was directed at chilling Plaintiff's speech, deterring continued reporting, interfering with petitioning activity, and raising the personal and professional costs of prosecuting Plaintiff's pending federal action.

**IV. Turkish Influence Campaign and Transnational Transactionalism (2014–2024)**

55. Plaintiff SALVATORE J. GRECO alleges that the federal indictment unsealed in September 2024 detailed a Turkish influence campaign using the Mayor’s Office to obtain official municipal acts in exchange for luxury benefits, compromising city regulatory sovereignty.

56. Plaintiff SALVATORE J. GRECO alleges from 2014 through 2020, as the Brooklyn Borough President, Defendant ERIC L. ADAMS solicited and received undisclosed luxury travel benefits from Turkish state-linked entities, including business-class Turkish Airlines upgrades (valued at over \$35,000 for a subset of routes) and luxury lodging including the Cosmopolitan Suite at the St. Regis Istanbul.

57. Plaintiff SALVATORE J. GRECO alleges in 2021, Defendant ERIC L. ADAMS coerced regulatory approval involving Turkevi Center: under pressure from Turkish officials that “it was his turn” to reciprocate, ADAMS allegedly caused FDNY safety standards to be bypassed to secure temporary occupancy in connection with a visit by President Recep Tayyip Erdoğan.

58. Plaintiff SALVATORE J. GRECO alleges official-boycott reciprocation: Defendant ERIC L. ADAMS allegedly boycotted Armenian Genocide remembrance events in 2022 as an official act satisfying Turkish demands connected to continued illicit benefit channels.

59. Plaintiff SALVATORE J. GRECO alleges from 2020 – 2023, Defendant ERIC L. ADAMS used a “Straw Donor Engine” to maximize extraction of public funds through deceptive campaign-finance mechanisms.

60. Plaintiff SALVATORE J. GRECO alleges that engine included fraudulent matching-fund certifications, straw-donor reimbursements by foreign or corporate interests, and coordination channels tied to Turkish officials.

61. Plaintiff SALVATORE J. GRECO alleges this scheme generated over \$10 million in public matching funds based on false certifications, exploiting the City's small-donor match structure.

62. Plaintiff SALVATORE J. GRECO publicly commented on and criticized these developments as part of sustained anti-corruption reporting through social media and *The Sal Greco Show*.

**V. The “Dream Team,” Patronage Staffing, and “Selling of Promotions” Allegations (September 2022–2023)**

63. In or about September 2022, following Plaintiff's termination, Defendant ERIC L. ADAMS consolidated a “Dream Team” advisory structure, including Philip Banks III and Timothy Pearson, which Plaintiff SALVATORE J. GRECO alleges operated as a shadow leadership channel that bypassed civil-service guardrails and rewarded political loyalty.

64. Plaintiff SALVATORE J. GRECO alleges that in or about January 2023, Defendant ERIC L. ADAMS ratified a custom under which elite NYPD units were staffed by politically connected “friends and cronies,” inconsistent with neutral merit-based deployment and advancement norms.

65. Plaintiff SALVATORE J. GRECO alleges that during this period, then-First Deputy Commissioner Edward Caban began a “selling promotions” practice involving payments up to approximately \$15,000, in stark contrast to the punitive “conduct prejudicial to good order” framing used against Plaintiff.

66. Plaintiff SALVATORE J. GRECO alleges this contrast evidenced selective, optics-driven discipline and non-neutral enforcement priorities tied to political protection.

67. Plaintiff SALVATORE J. GRECO publicly reported and criticized these patronage and promotion-practice issues as part of his protected commentary.

**VI. Suppression of CRT Audit and City Hall Protection Dynamics (June 2023 Forward)**

68. In or about June 2023, Plaintiff SALVATORE J. GRECO alleges the Office of the Mayor, with tacit approval of Defendant ERIC L. ADAMS, suppressed or failed to act upon internal warning findings from a CRT-related audit conducted by Matthew Pontillo (Professional Standards Bureau), which exposed unconstitutional stop patterns and misconduct concerns.

69. Plaintiff SALVATORE J. GRECO alleges the Community Response Team (“CRT”), described as answering “only to City Hall,” was protected from full corrective accountability while Plaintiff was targeted for expressive, non-criminal association and anti-corruption speech.

70. Plaintiff SALVATORE J. GRECO alleges this disparity formed part of a broader pattern in which command-favored structures received institutional cover while critics and perceived outsiders were subjected to punitive pressure.

71. Plaintiff SALVATORE J. GRECO publicly discussed these CRT oversight and accountability failures through his reporting platforms.

**VII. Banks Dynasty, Pearl Alliance, and Procurement Cronyism (October 2022–October 2024)**

72. Plaintiff SALVATORE J. GRECO alleges that Philip Banks, David Banks, and Terence Banks operated a centralized power nexus through the “Pearl Alliance” as an unregistered lobbying vehicle that sold access to City decision-makers.

73. Plaintiff SALVATORE J. GRECO alleges The 21stCentEd Quid Pro Quo: in October 2022, Schools Chancellor David Banks held a private meeting with 21stCentEd immediately after the company hired Terence Banks through Pearl Alliance channels, in alleged violation of COIB mandates.

74. Plaintiff SALVATORE J. GRECO alleges No-Bid Contract Explosion: after that access event, DOE funding to 21stCentEd surged, including approximately 138 no-bid contracts totaling approximately \$2 million, nearly tripling prior funding levels.

75. Plaintiff SALVATORE J. GRECO alleges SaferWatch Pilot Integration: SaferWatch, another Pearl Alliance client, was integrated into NYPD and school safety pilots while Philip Banks III and David Banks exercised command authority over those institutional lanes.

76. Plaintiff SALVATORE J. GRECO alleges NYCHA/City Safe Conflict: a contract valued at approximately \$154 million for emergency fire services was awarded to City Safe Partnership, formerly owned by Philip Banks III, through approval pathways including Sheena Wright, David Banks' partner.

77. Plaintiff SALVATORE J. GRECO alleges this procurement acts constitute a pay-to-play pipeline that bypassed COIB waiver requirements, favored connected entities, and defrauded the public trust.

78. Plaintiff SALVATORE J. GRECO publicly commented on, criticized, and chronologically tracked these procurement and cronyism developments in his reporting.

### **VIII. February 2024–January 2025 Corruption Timeline and Plaintiff's Commentary**

79. On or about February 29, 2024, federal agents executed searches tied to Winnie Greco, including locations publicly reported as Bronx residences and New World Mall in

Queens; Plaintiff SALVATORE J. GRECO publicly discussed these searches and their governance implications.

80. Plaintiff SALVATORE J. GRECO alleges Defendant ERIC L. ADAMS allowed Winnie Greco to remain in post for an extended period despite serious investigative exposure, evidencing tolerance toward insiders inconsistent with treatment imposed on Plaintiff.

81. On or about September 4, 2024, federal agents executed coordinated raids involving Edward Caban, Philip Banks III, David Banks, and Timothy Pearson; Plaintiff SALVATORE J. GRECO publicly discussed these events as corroboration of his corruption reporting.

82. Plaintiff SALVATORE J. GRECO alleges that the seizure of electronic devices in these actions provided substantial corroborative indicators of coordinated patronage and influence channels tied to Defendant ERIC L. ADAMS and NYPD-adjacent authority.

83. On September 26, 2024, the United States Attorney's Office for the Southern District of New York (SDNY) announced an indictment of Defendant ERIC L. ADAMS (publicly referenced as SDNY Case No. 24-cr-579), charging bribery/wire fraud-related counts; Plaintiff SALVATORE J. GRECO publicly addressed and analyzed this event in his chronology as part of ongoing public-accountability reporting.

84. On or about November 25, 2024, Plaintiff SALVATORE J. GRECO posted regarding Boris Epshteyn and Defendant ERIC L. ADAMS, including commentary that ADAMS was attempting to curry favor for favorable criminal-case outcomes.

85. On or about December 6, 2024, Plaintiff SALVATORE J. GRECO posted that Defendant ERIC L. ADAMS was seeking political favor from President Donald J. Trump in connection with dismissal of charges.

86. On or about December 25, 2024, Plaintiff SALVATORE J. GRECO alleges Benny Polatseck, identified as a media assistant to Defendant ERIC L. ADAMS, blocked Plaintiff on X despite no prior interaction or contact.

87. On or about January 23, 2025, Plaintiff SALVATORE J. GRECO posted regarding reporting that Defendant ERIC L. ADAMS interacted with Roger J. Stone in Washington, D.C. on January 20, 2025 at inauguration-related events.

88. Plaintiff SALVATORE J. GRECO alleges Roger J. Stone is a longtime associate with direct access to President Donald J. Trump and that Defendant ERIC L. ADAMS sought to leverage that relationship for legal/political advantage.

89. Plaintiff SALVATORE J. GRECO further alleges that, in or around that period, Defendant ERIC L. ADAMS, directly or through intermediaries, offered to “look into” Plaintiff’s pending EDNY case (22-cv-5109) while claims remained active before Senior District Judge Frederic Block.

90. Plaintiff SALVATORE J. GRECO alleges this was not benign outreach, but part of a pressure campaign and litigation gamesmanship intended to intrude upon, influence, and chill Plaintiff’s prosecution of his federal claims and undermine Plaintiff’s credibility as a public critic.

91. Plaintiff SALVATORE J. GRECO alleges a facially irreconcilable double standard: while Defendant ERIC L. ADAMS allegedly sought to leverage Roger J. Stone’s direct access to President Donald J. Trump for Defendant ADAMS’S own legal and political advantage, Defendant THE CITY OF NEW YORK had already imposed adverse action against Plaintiff for associating with that same individual. Plaintiff alleges this asymmetry is not neutral

governance, but selective enforcement—tolerance when the association serves City power, punishment when the association is tied to a public critic.

**IX. Real Estate Axis and Regulatory Capture: Lewis-Martin and Hamilton (2024–2025)**

92. Plaintiff SALVATORE J. GRECO alleges that through the Department of Citywide Administrative Services (DCAS) and Department of Buildings (DOB) influence channels, Ingrid Lewis-Martin and Jesse Hamilton, power brokers of Defendant ERIC L. ADAMS, treated City real-estate and permitting powers as monetizable assets for favored actors.

93. Plaintiff SALVATORE J. GRECO alleges Porsche Bribery/Money Laundering Scheme: in December 2024, Lewis-Martin was charged with accepting approximately \$100,000 in bribes from developers Raizada Vaid and Mayank Dwivedi, with funds routed to a joint account with Glenn Martin II and used to finance a Porsche valued at approximately \$113,000.

94. Plaintiff SALVATORE J. GRECO alleges “On-Call” DOB Interference: Lewis-Martin acted as a shadow consultant by pressuring DOB to resolve violations and expedite permits for Vaid/Dwivedi developments.

95. Plaintiff SALVATORE J. GRECO alleges “Little Birdie” Obstruction: investigative records reflected that Defendant ERIC L. ADAMS warned Eric Ulrich to “watch your back and watch your phones” after learning of wiretap exposure, indicating awareness and mitigation behavior regarding criminal investigation risk.

96. Plaintiff SALVATORE J. GRECO alleges Argento/DCAS Corruption: in August 2025, donors Gina and Tony Argento were indicted for benefits to Lewis-Martin (including travel and renovations), in exchange for contract steering and protective administrative treatment through Lewis-Martin/Hamilton channels.

97. Plaintiff SALVATORE J. GRECO alleges additional monetized-favors indicators included high-value personal items and tailored personnel/administrative favors in the Eric Ulrich orbit.

98. Plaintiff SALVATORE J. GRECO publicly commented on these real-estate corruption developments, including their implications for City governance legitimacy and retaliatory political culture.

**X. Nightlife “Fixers,” NYPD Leadership Crisis, and Pearson/EDC Allegations (September–December 2024)**

99. Plaintiff SALVATORE J. GRECO alleges the “Nightlife Mayor” (Defendant ERIC L. ADAMS) framework masked extortion-oriented gatekeeping in which enforcement relief was sold to venues through NYPD-linked influence channels.

100. Plaintiff SALVATORE J. GRECO alleges Caban Fixer Operation: James Caban, twin brother of Commissioner Edward Caban, operated a network charging venues fees (including approximately \$2,500) to neutralize complaints/enforcement by leveraging commissioner-level authority.

101. Plaintiff SALVATORE J. GRECO alleges September 2024 Leadership Collapse: coordinated FBI/IRS activity involving Commissioner Caban, Timothy Pearson, and Deputy Inspector Robert Gault created command-level crisis and evidenced deeper penetration of fixer structures into precinct command.

102. Plaintiff SALVATORE J. GRECO alleges Timothy Pearson’s EDC misconduct included influence over EDC/public-safety contractual lanes for associates while facing parallel allegations including battery and sexual harassment.

103. Plaintiff SALVATORE J. GRECO publicly discussed these events and their municipal-accountability implications through social media and *The Sal Greco Show*.

## **XI. Maddrey/Epps, DOJ Drop, and April 2025 Dismissal Legacy**

104. Plaintiff SALVATORE J. GRECO alleges that in December 2024, amid public allegations regarding former Chief of Department Jeffrey B. Maddrey and quid pro quo/overtime corruption dynamics, Defendants ERIC L. ADAMS and JESSICA S. TISCH allowed retirement with benefits, reinforcing insider-protection signals criticized by Plaintiff.

105. On February 10, 2025, the Department of Justice (DOJ) instructed federal prosecutors to drop charges against Defendant ERIC L. ADAMS; Plaintiff SALVATORE J. GRECO publicly discussed the irregularity and surrounding resignation fallout as evidence of unequal political protection.

106. Plaintiff SALVATORE J. GRECO alleges that the April 2025 dismissal of the federal indictment against Defendant ERIC L. ADAMS was a geopolitical bargain outcome, not a merits exoneration.

107. Plaintiff SALVATORE J. GRECO alleges United States District Judge Dale Ho characterized the dismissal context as a bargain linked to immigration-policy concessions, including ICE access to Rikers Island.

108. Plaintiff SALVATORE J. GRECO alleges the ruling noted no merits adjudication of guilt/innocence and acknowledged limits on judicial power to compel continued prosecution.

109. Plaintiff SALVATORE J. GRECO alleges these developments validated Plaintiff's reporting that selective discipline and political shielding coexisted as institutional practice.

## **XII. 2026 Continuity, COIB Developments, and Ongoing Retaliatory Effects**

110. Plaintiff SALVATORE J. GRECO alleges that from January 2026 through the present, Defendant THE CITY OF NEW YORK continued authorizing an aggressive ("scorched

earth") litigation posture against Plaintiff while City Hall faced additional public ethics/political-resource controversies.

111. On or about February 9, 2026, Plaintiff SALVATORE J. GRECO alleges COIB-related public developments concerning City Hall political activity further informed Plaintiff's reporting that retaliatory intent and selective discipline remained ongoing, not historical.

112. Plaintiff SALVATORE J. GRECO alleges that public reporting reflected continuing institutional fallout and personnel actions connected to the patronage architecture Plaintiff had been criticizing throughout the litigation period.

### **XIII. Monitoring, Emissary Conduct, Speech Chilling, and Litigation Interference<sup>1</sup>**

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<sup>1</sup> For decades, federal court supervision in the *Handschr* line has required that NYPD investigations touching political activity be predicated, documented, and supervised, rather than conducted as open-ended monitoring of dissent. See, e.g., *Handschr v. Special Servs. Div.*, 605 F. Supp. 1384 (S.D.N.Y. 1985) (consent decree framework); *Handschr v. Special Servs. Div.*, 273 F. Supp. 2d 327 (S.D.N.Y. 2003) (modification and guidelines framework); *Handschr v. Special Servs. Div.*, 288 F. Supp. 2d 411 (S.D.N.Y. 2003) (further order incorporating modified guidelines). See also *Raza v. City of New York* (S.D.N.Y.) (2016 settlement; 2017 revised settlement in conjunction with *Handschr* enhancing civilian-representative oversight).

The Seventh Annual Report of the Civilian Representative (filed Jan. 27, 2026, in *Handschr v. Special Servs. Div.*, Case No. 1:71-cv-02203, Docket No. 515) confirms that the "Operative Guidelines" require specific factual information regarding criminal activity before investigations implicating political activity may be opened or extended. The Representative is specifically mandated to report violations—including "systematic and repeated" ones—directly to the Court.

Plaintiff SALVATORE J. GRECO alleges that Defendants monitoring of *The Sal Greco Show*, its guests, and viewers, and related proxy-account activity, departed from these constraints and functioned as viewpoint-driven retaliation designed to chill protected speech and petitioning activity during active federal litigation.

113. Plaintiff SALVATORE J. GRECO alleges that from the filing of his EDNY action through the present, Defendants KAZ DAUGHTRY, JOHN M. CHELL, and RAJUB K. BHOWMIK acted directly and/or through NYPD social-media accounts, proxy accounts, and pseudonymous accounts to monitor and react to Plaintiff's reporting activity.

114. Plaintiff SALVATORE J. GRECO further alleges Defendant JESSICA S. TISCH, using NYPD resources—including personnel and functions of the NYPD Legal Bureau—monitored and tracked *The Sal Greco Show*, including guests and viewers, and tracked Plaintiff's speech across multiple platforms.

115. Plaintiff SALVATORE J. GRECO alleges such monitoring was operationalized to facilitate retaliatory targeting, amplify intimidation during active litigation, interfere with discovery and litigation posture, and chill continued speech/petitioning activity.

116. Plaintiff SALVATORE J. GRECO alleges Plaintiff's Mayor's Office-focused reporting was followed by escalated online hostility, retaliatory messaging patterns, targeted social-media activity, and reputational attacks.

117. Plaintiff SALVATORE J. GRECO alleges, on information and belief, that individuals connected to City Hall and/or Mayor's Office circles contributed to and amplified retaliatory digital campaigns directed at Plaintiff during active federal litigation.

118. Plaintiff SALVATORE J. GRECO alleges that this conduct was intended to raise the personal, professional, and litigation costs of Plaintiff's protected commentary and to deter continued anti-corruption reporting.

119. Plaintiff SALVATORE J. GRECO alleges resulting harms included fear, distress, reputational injury, diminished opportunities, and chilling effects on expressive and associational activity protected by the First Amendment.

120. Plaintiff SALVATORE J. GRECO alleges that the retaliatory conduct challenged herein was known to, tolerated by, and ratified by final policymakers for Defendant THE CITY OF NEW YORK; that it persisted notwithstanding repeated public notice, investigative events, and corruption-related disclosures during the relevant period; and that it was executed through municipal channels and resources—including official and proxy social-media ecosystems, NYPD Legal Bureau functions, and command-level coordination—thereby constituting municipal custom, policy, usage, and/or deliberate indifference under Monell.

**C. NYPD Retaliation Pattern, Command-Level Amplification, and Notice-Based Municipal Failure**

121. During the pendency of Plaintiff's federal civil-rights action in the Eastern District of New York, Docket No. 22-cv-5109 before Senior District Judge Frederic Block, Plaintiff SALVATORE J. GRECO engaged in sustained reporting and commentary concerning NYPD misconduct, City Hall corruption, and command-level accountability through "*The Sal Greco Show*" and related social-media platforms.

122. On August 4, 2022, following Plaintiff SALVATORE J. GRECO's separation, NYPD requested action to the New York State Division of Criminal Justice Services ("DCJS"), resulting in Plaintiff's public listing in the decertified officer registry with the entry: "Removal for Cause – 9 NYCRR § 6056.2(h)(2)(a)(ii) ... in accordance with Civil Service Law § 76," with category reference "CPL § 1.20(34)."

123. Plaintiff SALVATORE J. GRECO alleges this credential/status action functioned as a continuing punitive mark affecting reputation, employability, and professional standing during the pendency of Plaintiff's federal action.

124. Plaintiff SALVATORE J. GRECO alleges publication and maintenance of this status, in combination with the retaliatory digital campaign alleged herein, imposed continuing stigma and materially increased the cost of protected speech, petitioning activity, and ongoing litigation.

**I. Early Retaliatory Contact and Escalation Timeline (2024)**

125. On or about January 9, 2024, Plaintiff SALVATORE J. GRECO received two threatening emails from fake accounts allegedly linked to MOS after Plaintiff exposed Con Sofrito on Gateway Pundit and other media appearances.

126. On or about January 10, 2024, Plaintiff SALVATORE J. GRECO posted Instagram content concerning Con Sofrito; Plaintiff alleges the post reached approximately 100,000 views and included comments from an account later deleted and identified by Plaintiff as "Capt Spaulding (MOS)."

127. On or about January 11, 2024, Plaintiff SALVATORE J. GRECO alleges a "SweetLexi" comment appeared on Plaintiff's January 10, 2024 Instagram content.

128. On or about January 11, 2024, Plaintiff SALVATORE J. GRECO alleges "AllCopAreWoke" attempted to contact Plaintiff and was later investigated by IAB for threats involving other former members of the service, including Plaintiff; Plaintiff identifies IAB #24-2249.

129. On or about February 8, 2024, Plaintiff SALVATORE J. GRECO filed a complaint concerning Defendant KAZ DAUGHTRY.

130. On or about February 17, 2024, Plaintiff SALVATORE J. GRECO blocked Instagram account “AllCopsAreComplainers,” which Plaintiff alleges was part of a coordinated “Dream Team” network, after repeated comments on Plaintiff’s posts. Plaintiff alleges the NYPD “Dream Team” included Defendant ERIC L. ADAMS, KAZ DAUGHTRY, JOHN M. CHELL, and others.

131. On or about March 9, 2024, Plaintiff SALVATORE J. GRECO identified MOS WhatsApp activity linked to NYPD personnel.

132. On or about April 8, 2024, Plaintiff SALVATORE J. GRECO identified the pending Dana Rachlin matter, and how Defendant JOHN M. CHELL and others are interfering with the litigation process before Senior District Judge Block.

133. Plaintiff SALVATORE J. GRECO alleges that throughout the period since his termination, he has been rejected from multiple post-termination job opportunities.

134. On or about August 9, 2024, Plaintiff SALVATORE J. GRECO filed a complaint with the Department of Investigation (“DOI”) against Defendant KAZ DAUGHTRY, alleging that Defendant DAUGHTRY was performing law-enforcement activities while armed, despite holding the civilian title of Assistant Commissioner; Plaintiff further alleged that this title structure enabled Defendant DAUGHTRY to receive overtime while avoiding Civilian Complaint Review Board (“CCRB”) jurisdiction, and that this preferential arrangement was approved by Defendant ERIC L. ADAMS.

135. On or about September 8, 2024, Plaintiff SALVATORE J. GRECO alleges Darlene Rodriguez monitored Plaintiff’s Instagram activity, and Plaintiff responded publicly. Plaintiff further alleges she is the cousin of Jimmy Rodriguez.<sup>2</sup>

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<sup>2</sup> Notwithstanding his self-admitted criminal record, Plaintiff SALVATORE J. GRECO is able to establish some evidence that he

136. On or about November 1, 2024, Plaintiff SALVATORE J. GRECO alleges Defendant JOHN M. CHELL initiated personal X and LinkedIn accounts.

**II. Institutional Notice: DOI/OIG-NYPD Findings (CRT and Executive Social Media)**

137. On November 26, 2024, DOI/OIG-NYPD issued a Critical Response Team (“CRT”) report identifying structural deficiencies in mission definition, written policy, training, recruitment, and data-accountability systems.

138. The CRT report found that CRT was frequently featured on NYPD social media but not adequately described on the Department’s public website.

139. The CRT report found no CRT mission statement, no CRT-specific written policies/procedures, and no CRT-specific training requirements.

140. The CRT report found no written recruitment procedures and no reliable mechanism to track or retain complaint data used to evaluate CRT outcomes.

141. DOI/OIG-NYPD stated those transparency and policy gaps increased risk of non-compliance, ethical breaches, and negative policing outcomes, and announced continuing investigative activity into disciplinary history and enforcement impacts.

142. On January 28, 2025, DOI/OIG-NYPD issued findings that certain NYPD executive social-media communications, including communications associated with Defendants KAZ DAUGHTRY and JOHN M. CHELL, were unprofessional, discourteous, demeaning, and at times could be perceived as threatening or intimidating.

143. DOI/OIG-NYPD further found those exchanges targeted persons critical of law enforcement and undermined public trust.

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has associated with or tried to associate himself with the Lucchese crime family.

144. DOI/OIG-NYPD found NYPD social-media practices were not fully compliant with Citywide Social Media Policy requirements.

145. DOI/OIG-NYPD found NYPD lacked a formal internal approval process for executive account posts and lacked sufficient executive-level oversight.

146. DOI/OIG-NYPD found NYPD did not provide formal executive training on social-media standards and public-impact risk.

147. DOI/OIG-NYPD found NYPD's December 2, 2022 policy was not updated to incorporate all June 2023 Citywide requirements.

148. DOI/OIG-NYPD found certain accounts were unregistered and not approved through required City channels.

149. DOI/OIG-NYPD reported discourteous targeted exchanges ceased in early May 2024 after public criticism and DOI investigative request, while improved practices remained informal rather than fully codified.

150. DOI/OIG-NYPD recommended written approval protocols, policy updates, registration compliance, executive-account oversight, and training.

### **III. Command-Level Events and Public Accountability Commentary (2025)**

151. On January 2, 2025, federal law-enforcement officials executed searches tied to former NYPD Chief of Department Jeffrey B. Maddrey, including his residence, and he was publicly reported as suspended without pay the same day.

152. Plaintiff SALVATORE J. GRECO publicly commented on the Maddrey raid/suspension and its implications for NYPD command-level accountability, corruption oversight, and the alleged quid pro quo matter involving former Lieutenant Quathisha Epps.

153. On or about April 26, 2025, Plaintiff SALVATORE J. GRECO posted that Assistant Chief Ruel R. Stephenson was associating with Jimmy Rodriguez at Sobro Garden.

154. On or about May 16, 2025, Plaintiff SALVATORE J. GRECO posted that Chief of Training Martine N. Materasso was associating with Jimmy Rodriguez at Sobro Garden.

155. On or about June 7, 2025, Plaintiff SALVATORE J. GRECO posted regarding a stabbing incident at Sobro Garden and alleged Jimmy Rodriguez was arrested and issued a summons.

156. On or about June 7, 2025, Plaintiff SALVATORE J. GRECO published commentary asking whether NYPD executives were covering up the Sobro Garden stabbing incident.

157. On or about June 9, 2025, Plaintiff SALVATORE J. GRECO posted regarding Defendants JOHN M. CHELL and KAZ DAUGHTRY appearing with President Donald J. Trump on a golf course; Plaintiff alleged that, because President Trump is a convicted felon, that association implicated the same policy logic Defendant THE CITY OF NEW YORK previously invoked against Plaintiff for his association with Roger J. Stone, yet Defendant JESSICA S. TISCH took no comparable action against CHELL or DAUGHTRY—demonstrating selective enforcement: punishment for Plaintiff, tolerance for favored insiders.

158. On or about July 25, 2025, Plaintiff SALVATORE J. GRECO alleges Defendant JOHN M. CHELL posted “Your fired” on X in reference to Plaintiff; Plaintiff links this event to IAB log #25-23503.

159. On or about July 30, 2025, Plaintiff SALVATORE J. GRECO alleges that Defendant ANTHONY L. HERBERT, acting in support of Defendant ERIC L. ADAMS,

initiated an unsolicited attack on Plaintiff via X as part of the broader retaliatory campaign targeting Plaintiff's protected speech and ongoing litigation activity.

160. On or about August 23, 2025, Plaintiff SALVATORE J. GRECO alleges Instagram account Frank.Furillio2024 attacked Plaintiff and alleges the account was controlled by Defendant JOHN M. CHELL.

161. On or about August 30, 2025, Plaintiff SALVATORE J. GRECO alleges additional attacks from Frank.Furrillio2024 and further alleges the account was exposed as tied to Defendant JOHN M. CHELL.

162. On or about October 2, 2025, Plaintiff SALVATORE J. GRECO alleges Instagram account MikeyBones.313 threatened Plaintiff, and Plaintiff alleges affiliation with John Chell.

163. On or about October 8, 2025, Plaintiff SALVATORE J. GRECO alleges MikeyBones.313 again attacked on Instagram and alleges JOHN M. CHELL remained active online on his final day as Chief of Department.

164. From in or about March 2025 through the present, Plaintiff SALVATORE J. GRECO alleges Defendant RAJUB B. BHOWMIK, acting directly and/or through affiliated, proxy, and pseudonymous social-media channels, repeatedly and falsely portrayed Plaintiff as a "racist" in connection with Plaintiff's protected reporting and broadcasts on *The Sal Greco Show*; Plaintiff further alleges this conduct was intentional and directed to intimidate Plaintiff's guests and viewers, suppress audience participation, chill Plaintiff's speech and petitioning activity, and shield Defendant KAZ DAUGHTRY and the administration operating under Defendant JESSICA S. TISCH from continued public scrutiny.

165. Plaintiff SALVATORE J. GRECO alleges the above-described posts, attacks, and threatening communications followed Plaintiff's public-corruption commentary, were temporally and substantively linked to that protected speech, and were intended to deter Plaintiff's audience, guests, and continued petitioning activity in his pending federal litigation.

**IV. Tisch Criticism and Intensification of Hostility**

166. Plaintiff SALVATORE J. GRECO further alleges that since November 20, 2024, his protected commentary concerning Defendant JESSICA S. TISCH included criticism of perceived media protection, institutional favoritism, and reported power-network relationships tied to the Tisch family, including public references by Plaintiff to Jeffrey Epstein-related associations and to Andrew H. Tisch's role on the Board of Trustees of the New York City Police Foundation.

167. Plaintiff SALVATORE J. GRECO alleges that this speech was political opinion and public-interest commentary concerning corruption risk, governance integrity, and command-level accountability in New York City law enforcement.

168. Plaintiff SALVATORE J. GRECO alleges that, during and after this expanded criticism, retaliatory hostility intensified, including coordinated online targeting and intimidation, as part of the continuing retaliatory pattern pleaded herein, and was intended to chill Plaintiff's speech, petitioning activity, and prosecution of his pending federal claims.

**V. Credential Weaponization, Selective Enforcement, and Municipal Liability Theory**

169. Plaintiff SALVATORE J. GRECO alleges Defendants used discretionary credential-control mechanisms—including post-separation records/status channels, certification-related pathways, and associated professional gatekeeping effects—as components of a broader

retaliation architecture directed at Plaintiff's protected speech and ongoing federal litigation activity.

170. Plaintiff SALVATORE J. GRECO alleges that, following separation, NYPD requested status actions and continued publication/maintenance effects operated in practice as a continuing punitive mark, carrying foreseeable reputational, employability, and professional-standing consequences during the pendency of Plaintiff's EDNY action.

171. Plaintiff SALVATORE J. GRECO alleges similarly situated individuals were not uniformly subjected to equivalent reputationally destructive treatment, and that selective deployment of credential/status machinery functioned as extra-judicial punishment under color of administrative process.

172. Plaintiff SALVATORE J. GRECO alleges policymakers had actual and/or constructive notice that credential-linked decisions and status designations can impose substantial downstream harm—including stigma, lost opportunities, and deterrence of protected activity—yet failed to implement timely safeguards against retaliatory or discriminatory deployment.

173. Plaintiff SALVATORE J. GRECO alleges the retaliatory course of conduct was continuous and escalating, and included direct threats, proxy attacks, reputational targeting, employment interference, and intimidation designed to chill protected speech, petitioning activity, and continued prosecution of federal claims.

174. Plaintiff SALVATORE J. GRECO alleges NYPD personnel and/or affiliates monitored, tracked, and reacted to Plaintiff's reporting and platform activity while Plaintiff's EDNY matter remained active, and that such monitoring facilitated targeted retaliatory responses.

175. Plaintiff SALVATORE J. GRECO alleges City and NYPD policymakers had notice of governance and oversight deficiencies during the same period—including deficiencies in executive social-media controls, policy formalization, training, and accountability structures—and failed to timely and adequately remediate those deficiencies.

176. Plaintiff SALVATORE J. GRECO alleges that retaliation in this matter operated by form as well as by message: actions framed as process, compliance, or administrative discretion functioned as punishment, stigma, and deterrence in practical effect.

177. Plaintiff SALVATORE J. GRECO alleges NYPD's centralized control over credential-linked outcomes enabled selective, opaque, and punitive enforcement outside ordinary due-process transparency and without neutral, consistently applied standards.

178. Plaintiff SALVATORE J. GRECO alleges retaliatory motive is inferable from timing, sequence, pattern, and selective enforcement, including escalation after high-visibility anti-corruption reporting and during active litigation.

179. Plaintiff SALVATORE J. GRECO alleges this pattern was municipal in character—known to, tolerated by, ratified by, executed through municipal channels and resources, and/or unremedied by final policymakers—including official social-media ecosystems, Legal Bureau functions, and command-level coordination—thereby constituting custom, practice, and/or deliberate indifference for Monell purposes.

## **VI. Persuasive Authority on Credential-Based Retaliation and Optics-Driven Discipline**

180. Plaintiff SALVATORE J. GRECO references *Perros v. County of Nassau*, 2025 WL 2533586 (E.D.N.Y. Sept. 3, 2025), as persuasive authority that discretionary, credential-linked determinations may be actionable where used in practice to impose stigma, reputational injury, and deterrence of protected activity.

181. Plaintiff SALVATORE J. GRECO invokes *Perros* for legal analogy only, and does not allege identity of facts between that matter and this action.

182. Plaintiff SALVATORE J. GRECO further alleges that where administrative discretion is exercised selectively and with punitive practical effect, a factfinder may infer retaliatory purpose from timing, pattern, and differential treatment, notwithstanding neutral process labels.

183. Plaintiff SALVATORE J. GRECO references *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978), and its progeny for the principle that municipal liability may arise from policy, custom, pattern, ratification, and/or deliberate indifference, including where unconstitutional outcomes are produced through recurring discretionary practices rather than express written directives.

184. Plaintiff SALVATORE J. GRECO alleges that the credential/status-related conduct pleaded in this Complaint, when viewed with the pleaded chronology of digital targeting, monitoring, and notice-based policy failures, is consistent with a municipal custom or practice actionable under *Monell*.

185. Plaintiff further relies on authority addressing pretextual and selectively enforced disciplinary frameworks, including *Chislett v. New York City Department of Education*, for the proposition that where enforcement is optics-driven, complaints are met with inaction or tolerated escalation, and adverse consequences are imposed through discretionary mechanisms untethered to consistently applied standards, a factfinder may infer retaliatory motive and municipal acquiescence rather than neutral administration.

186. Plaintiff invokes the foregoing authorities as legal context supporting inferential frameworks; Plaintiff's factual claims remain those pleaded in the dated chronology and municipal-notice allegations above.

187. Plaintiff alleges that Defendants anticipated characterization of challenged acts as "administrative," "compliance-based," or "discretionary" does not immunize conduct where the pleaded practical effect is punishment, stigma, and deterrence of protected speech and petitioning.

**D. Municipal Liability Under Monell (Policy, Custom, Deliberate Indifference, and Causation)**

188. Plaintiff SALVATORE J. GRECO alleges that the retaliatory conduct described above was not isolated or random, but occurred within and through municipal systems controlled by Defendant THE CITY OF NEW YORK, including City Hall and NYPD command structures.

189. Plaintiff SALVATORE J. GRECO alleges that final policymakers and senior officials, including policymakers identified above, had actual and/or constructive notice of recurring misuse of official and quasi-official communication channels, including executive social-media activity targeting critics, and failed to implement timely, binding safeguards.

190. Plaintiff SALVATORE J. GRECO alleges that public oversight findings issued during the same period identified material governance failures in NYPD policy, executive oversight, account registration compliance, training, and approval protocols, yet corrective action remained incomplete, informal, delayed, and/or non-codified.

191. Plaintiff SALVATORE J. GRECO alleges that, despite notice of those deficiencies, municipal policymakers tolerated continuation of discretionary systems that enabled targeted retaliation through threats, proxy harassment, reputational attacks, and coordinated online amplification directed at Plaintiff.

192. Plaintiff SALVATORE J. GRECO alleges that NYPD and City actors exercised centralized control over credential-linked and status-linked mechanisms—including records transmission, designation effects, and other gatekeeping channels—with inadequate transparency, inadequate neutral safeguards, and inadequate anti-retaliation controls.

193. Plaintiff SALVATORE J. GRECO alleges that these discretionary systems were used selectively and pretextually against Plaintiff during active federal litigation, functioning as extra-judicial punishment under administrative form.

194. Plaintiff SALVATORE J. GRECO alleges that similarly situated persons were not treated uniformly, and that differential treatment tracked protected speech, anti-corruption reporting, perceived disloyalty, and ongoing petitioning activity, as reflected in the chronology pleaded in Sections B and C.

195. Plaintiff SALVATORE J. GRECO alleges that municipal policymakers were deliberately indifferent to the obvious risk that discretionary communication and credential-control channels would be used to chill protected expression and burden litigants challenging City misconduct.

196. Plaintiff SALVATORE J. GRECO alleges that this deliberate indifference was a moving force behind the constitutional injuries pleaded herein, including chilling of speech and petitioning, reputational injury, emotional distress, interference with employment opportunities, and increased personal and professional cost of pursuing federal civil-rights litigation.

197. Plaintiff SALVATORE J. GRECO alleges that the City's policy/custom is shown by one or more of the following, as evidenced by the pleaded timeline, oversight findings, and post-notice continuation: (a) express and implied authorization of retaliatory practices; (b) persistent and widespread practice amounting to custom; (c) failure to supervise, train, and

discipline after notice; (d) ratification by senior officials; and/or (e) maintenance of opaque discretionary systems foreseeably used as punitive tools.

198. Plaintiff SALVATORE J. GRECO alleges that the retaliatory pattern pleaded herein was municipal in character—known to, tolerated by, ratified by, and unremedied by final policymakers—and therefore constitutes policy, custom, and/or deliberate indifference attributable to Defendant THE CITY OF NEW YORK.

199. Plaintiff SALVATORE J. GRECO alleges that, as a direct and proximate and foreseeable result of the foregoing municipal acts and omissions, he suffered and continues to suffer constitutional, reputational, emotional, and professional harms for which compensatory and other lawful relief is warranted.

### **VIOLATIONS AND CLAIMS ALLEGED**

#### **COUNT I**

#### **42 U.S.C. § 1983 — First Amendment Retaliation (Free Speech and Petition) (Against Individual Defendants and John Does 1–5)**

200. Plaintiff SALVATORE J. GRECO repeats and realleges all preceding paragraphs as if fully set forth herein.

201. Plaintiff SALVATORE J. GRECO engaged in constitutionally protected activity, including public commentary, reporting, and petitioning concerning alleged public corruption, NYPD misconduct, and City governance, including through “*The Sal Greco Show*” and social-media platforms.

202. Plaintiff SALVATORE J. GRECO also engaged in protected petitioning by filing and prosecuting his pending federal civil-rights action in the Eastern District of New York.

203. Defendants ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 was

aware of Plaintiff SALVATORE J. GRECO'S protected speech and petitioning activity.

204. After and during Plaintiff SALVATORE J. GRECO'S protected activity, Defendants ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5, and/or persons acting in concert with them, engaged in materially adverse actions, including targeted threats, intimidation, online harassment, proxy attacks, monitoring, reputational targeting, and other retaliatory conduct alleged in this Complaint.

205. Plaintiff SALVATORE J. GRECO further alleges retaliatory use of discretionary credential/status channels, including post-separation records mechanisms and related gatekeeping effects, to burden Plaintiff's professional standing and chill continued speech and petitioning.

206. The adverse actions would deter a person of ordinary firmness from continuing protected speech and petitioning activity.

207. The retaliatory conduct was substantially motivated by Plaintiff SALVATORE J. GRECO'S protected expression and litigation activity, as shown by timing, pattern, escalation, and repeated references to Plaintiff's public criticism.

208. As a direct and proximate result, Plaintiff SALVATORE J. GRECO suffered and continues to suffer emotional distress, reputational harm, professional injury, chilling of expression, and other damages.

209. Defendants ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 acted under color of state law and with reckless or callous indifference to Plaintiff's federally protected rights.

**COUNT II**

**42 U.S.C. § 1983 — Procedural Due Process (Stigma-Plus / Liberty Interest)  
(Against Individual Defendants and John Does 1–5)**

210. Plaintiff SALVATORE J. GRECO repeats and realleges all preceding paragraphs as if fully set forth herein.

211. Plaintiff SALVATORE J. GRECO alleges Defendants ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 imposed and/or maintained a publicly stigmatizing post-separation status/credential designation, including DCJS decertification-related publication identified in this Complaint.

212. Plaintiff SALVATORE J. GRECO alleges this stigmatizing designation was coupled with concrete, material burdens (“plus” factors), including employability impairment, professional gatekeeping effects, reputational destruction, and ongoing professional disability.

213. Plaintiff SALVATORE J. GRECO alleges he was deprived of a meaningful name-clearing process and other constitutionally adequate procedures in connection with the stigma-plus consequences.

214. Plaintiff SALVATORE J. GRECO further alleges selective and retaliatory use of discretionary credential-control mechanisms outside ordinary due-process transparency.

215. Defendants ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 acted under color of state law.

216. As a direct and proximate result, Plaintiff SALVATORE J. GRECO suffered continuing reputational, economic, emotional, and professional injury.

**COUNT III**  
**Municipal Liability — 42 U.S.C. § 1983 (Monell)**  
**(Against Defendant THE CITY OF NEW YORK)**

217. Plaintiff SALVATORE J. GRECO repeats and realleges all preceding paragraphs as if fully set forth herein.

218. The constitutional violations alleged were caused by municipal policy, custom, usage, practice, and/or deliberate indifference by final policymakers of the City of New York.

219. Plaintiff SALVATORE J. GRECO alleges a persistent pattern of retaliatory and selectively punitive use of official/quasi-official channels, including social-media amplification, monitoring practices, and credential/status gatekeeping mechanisms.

220. Plaintiff SALVATORE J. GRECO alleges policymaker notice through repeated public incidents, internal/external complaints, and oversight findings, including OIG/DOI findings regarding executive social-media governance deficiencies, lack of policy controls, lack of training, insufficient oversight, and noncompliance concerns pleaded in this action.

221. Despite such notice, the City failed to timely implement adequate safeguards, supervision, training, and accountability measures to prevent foreseeable constitutional violations.

222. Plaintiff SALVATORE J. GRECO alleges these municipal failures were moving forces behind the retaliation, stigma-plus harms, and chilling effects alleged in this Complaint.

223. The City's acts/omissions constituted deliberate indifference to Plaintiff SALVATORE J. GRECO'S constitutional rights.

224. Plaintiff SALVATORE J. GRECO further alleges that the challenged retaliatory conduct was known to and ratified by final policymakers, persisted despite repeated public notice and investigative events, and was executed through municipal channels and resources, including

official social-media ecosystems, Legal Bureau functions, and command-level coordination.

**Reservation of Objection to Qualified Immunity; Alternative Pleading**

225. Plaintiff SALVATORE J. GRECO repeats and realleges all preceding paragraphs as if fully set forth herein.

226. Plaintiff SALVATORE J. GRECO expressly preserves the legal position that qualified immunity is not contained in the text enacted by Congress in the Civil Rights Act of 1871, now codified at 42 U.S.C. § 1983, which provides that a person acting under color of law who deprives another of federal rights “shall be liable to the party injured.”

227. Plaintiff SALVATORE J. GRECO further preserves for appellate review the contention that superimposing atextual immunity barriers on § 1983 conflicts with the statute’s text, structure, and remedial purpose.

228. In the alternative, and under controlling precedent, Plaintiff SALVATORE J. GRECO alleges the Individual Defendants are not entitled to qualified immunity because the Complaint pleads intentional retaliation for protected speech and petitioning, viewpoint-based targeting, intimidation, and interference with ongoing litigation through official and quasi-official channels.

229. Plaintiff SALVATORE J. GRECO alleges that, at all relevant times, it was clearly established that government officials may not retaliate against protected First Amendment activity, may not use state authority to chill speech through threats or coercive targeting, and may not impose stigma-plus burdens without constitutionally adequate process.

230. Plaintiff SALVATORE J. GRECO alleges a reasonable official in Defendants positions would have understood that the conduct pleaded—including command-level

monitoring of Plaintiff's reporting platforms, proxy/pseudonymous amplification, and discretionary credential/status mechanisms used with punitive effect—was unlawful.

231. Plaintiff SALVATORE J. GRECO therefore pleads that qualified immunity does not bar relief on the facts alleged, while preserving all objections to the doctrine's atextual expansion beyond § 1983's primary-law command.

**COUNT IV**

**New York State Human Rights Law Retaliation  
N.Y. Exec. Law § 296(7) (and Aiding and Abetting under § 296(6), where applicable)  
(Against All Appropriate Defendants)**

232. Plaintiff SALVATORE J. GRECO repeats and realleges all preceding paragraphs as if fully set forth herein.

233. Plaintiff SALVATORE J. GRECO engaged in protected activity within the meaning of the NYSHRL, including opposition to what he reasonably believed to be unlawful practices and participation in protected complaint/litigation activity.

234. Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 were aware of Plaintiff SALVATORE J. GRECO'S protected activity.

235. Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 subjected Plaintiff SALVATORE J. GRECO to retaliatory actions, including the adverse and deterrent conduct alleged throughout the Complaint, such as targeted intimidation, reputational harm mechanisms, employment interference, and credential/status-related retaliation.

236. There is a causal connection between Plaintiff SALVATORE J. GRECO'S protected activity and Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 retaliatory conduct, as shown by temporal proximity, escalation, and patterned conduct.

237. Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 retaliatory conduct would deter a reasonable person from engaging in protected activity.

238. Individual Defendants ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 who participated in, facilitated, ordered, ratified, or failed to stop retaliatory conduct are additionally liable under NYSHRL aiding-and-abetting principles, as applicable.

239. Plaintiff SALVATORE J. GRECO suffered damages as a direct and proximate result, including emotional distress, reputational injury, and professional/economic harm.

**COUNT V**  
**New York City Human Rights Law Retaliation**  
**N.Y.C. Admin. Code § 8-107(7)**  
**(Against All Appropriate Defendants)**

240. Plaintiff SALVATORE J. GRECO repeats and realleges all preceding paragraphs as if fully set forth herein.

241. Plaintiff SALVATORE J. GRECO engaged in protected activity under the NYCHRL.

242. Defendants ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 knew of Plaintiff SALVATORE J. GRECO protected activity.

243. Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 engaged in conduct reasonably likely to deter a person from engaging in protected activity, including the retaliatory acts alleged in this Complaint (direct, proxy, digital, reputational, employment-related, and credential/status-linked).

244. Under the NYCHRL’s broad remedial standard, Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L. HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5 actions constitute unlawful retaliation regardless of whether each act independently rose to the level of a federal “materially adverse action.”

245. The retaliation was motivated, at least in part, by Plaintiff SALVATORE J. GRECO protected activity.

246. Plaintiff SALVATORE J. GRECO sustained damages including emotional distress, reputational and professional harm, and chilling of protected conduct.

#### **JURY TRIAL**

247. Plaintiff SALVATORE J. GRECO demands a trial by jury of all issues in this action that are so triable.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff SALVATORE J. GRECO respectfully demands judgment in his favor and against Defendants THE CITY OF NEW YORK, ERIC L. ADAMS, ANTHONY L.

HERBERT, KAZ DAUGHTRY, JESSICA S. TISCH, JOHN M. CHELL, RAJUB K. BHOWMIK, and JOHN DOES 1–5, jointly and severally where permitted by law, and requests that this Court:

- A. Enter judgment in favor of Plaintiff SALVATORE J. GRECO on all Counts asserted in this Complaint;
- B. Declare that Defendants acts and omissions, and the policies, practices, customs, and usages alleged herein, as applied to Plaintiff SALVATORE J. GRECO, violated Plaintiff's rights under the First and Fourteenth Amendments, 42 U.S.C. § 1983, the NYSHRL, and the NYCHRL;
- C. Award compensatory damages in an amount to be determined at trial for emotional distress, reputational harm, professional and economic injury, loss of opportunities, and all other consequential harm caused by Defendants unlawful conduct;
- D. Award punitive damages against the individual Defendants to the fullest extent permitted by law;
- E. Award equitable and injunctive relief, including but not limited to:
  1. Enjoining further retaliatory conduct;
  2. Requiring cessation of retaliatory monitoring, targeting, and misuse of official or quasi-official channels;
  3. Directing removal, correction, or annotation of stigmatizing credential/status records to the extent authorized by law; and
  4. Ordering implementation of lawful training, supervision, and oversight

measures sufficient to prevent recurrence of the retaliatory practices alleged herein;

- F. Award reasonable attorneys' fees, expert fees, and costs pursuant to 42 U.S.C. § 1988, the NYCHRL, and all other applicable authorities;
- G. Award pre-judgment and post-judgment interest as permitted by law; and
- H. Grant such other and further legal or equitable relief as this Court deems just, proper, and necessary.

Dated: February 12, 2026  
New York, N.Y.

Respectfully submitted,

By: /s/Eric Sanders, Esq.

Eric Sanders, Esq.  
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