

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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N.T.,

Index No.: 804313/2026E

Plaintiff,

-against-

CITY OF NEW YORK, and JEREMY  
SCHEUBLIN, Individually,

Defendants.  
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**AFFIDAVIT OF PLAINTIFF N.T.**  
**IN SUPPORT OF ORDER TO SHOW CAUSE FOR**  
**TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

N.T., being duly sworn, deposes and states the following:

**Identity and Employment**

1. I am the Plaintiff in the above-captioned action. I submit this affidavit in support of my application for a temporary restraining order and preliminary injunction. I make this affidavit based upon my personal knowledge and experience.
2. I am a police officer employed by the New York City Police Department (“NYPD”). I joined the NYPD on January 6, 2020 and have served continuously since that date.
3. I have been assigned to the 46th Precinct in the Bronx since approximately July 2020. I have performed my duties without incident and with satisfactory performance evaluations throughout my tenure.
4. I am an African American woman. I am the mother of two young children.

### The Assault

5. On January 1, 2025, Defendant Inspector Jeremy Scheublin summoned me to his office at the 46th Precinct. I believed other members of service would be present. When I entered, I realized I was alone with him. He closed the door behind me.
6. Defendant Scheublin then sexually assaulted me. He grabbed my buttocks, threw me onto a couch in his office, attempted to kiss me on the lips, attempted to place his hand around my neck, and attempted to remove my gun belt. He was armed with his service weapon throughout the entire assault. I was terrified.
7. I physically fought Defendant Scheublin to escape the assault. I pushed him away from me repeatedly. I placed my hands over my face to block his attempts to kiss me. I kicked him. I told him to stop. He did not stop. I continued to fight him and refuse his advances until I was finally able to break free. I believed that if I did not physically fight him off, he would have raped me.
8. When I finally broke free, I was shaking uncontrollably. I had bruising and redness on my legs and knees. My clothing was displaced. Defendant Scheublin ordered me to wait in his office while he adjusted his own clothing. I was too afraid to leave without his permission because he was my Commanding Officer.
9. After the assault, I reported what happened to my delegate. I attempted to call the Internal Affairs Bureau myself but was unable to go through with the call. My lieutenant then reported the assault to the Office of Equal Employment Opportunity (“OEEO”), which in turn reported it to the Internal Affairs Bureau (“IAB”). IAB investigated and made a criminal referral to the Bronx County District Attorney’s Office.

### Ongoing Fear and Emotional Harm

10. Since the assault, I have experienced severe and ongoing emotional distress, anxiety, fear, and humiliation. I have difficulty sleeping. I experience panic and dread before every shift. I am in constant fear that Defendant Scheublin will retaliate further or harm me again.
11. I am forced to remain hypervigilant every moment I am on duty. I cannot relax. I cannot focus on my work the way I once did. I am constantly looking over my shoulder. I heard an indirect statement from a supervisor referring to “two-legged rats,” which I understood to be a reference to me for reporting the assault. My schedule has been manipulated. I have learned that in the NYPD, reporting what Defendant Scheublin did to me made me a target, not a victim. Every shift, I carry the weight of that reality alongside my badge.
12. Defendant Scheublin remains on full duty with his service weapon. Every time I am aware that he is in my vicinity or within my chain of command, I experience fear for my physical safety. He sexually assaulted me while armed. He has threatened me. I do not feel safe.
13. The knowledge that the NYPD has known about the assault for over fourteen months and has chosen to do nothing to protect me has caused me to feel abandoned by the institution I serve. I reported through every channel available to me — Internal Affairs, the Office of Equal Employment Opportunity, the Bronx District Attorney’s Office — and still, the man who assaulted me remains armed and in a position of authority.

### Retaliation

14. After I reported the assault, Defendant Scheublin retaliated against me. My schedule was changed to require me to report at approximately 3:00 a.m. for pre-tour overtime. Defendant Scheublin knew I have young children and that this schedule would disrupt my childcare arrangements. It did.

15. My partner was stripped from me. I was assigned to undesirable posts. I was forced to remain at the Command after my tour for pretextual reasons. I was ordered out of the precinct when Defendant Scheublin was arriving so that he would not have to see me. The message was clear: I was being punished for reporting what he did to me.
16. On one occasion, Defendant Scheublin told me directly that “it didn’t go well for the last person who made accusations against me.” Police Officer Strothers was present and immediately said, “Woah! Is that a threat?” I understood this as a threat intended to prevent me from making a complaint.
17. The day after the assault, Defendant Scheublin attempted to buy my silence. He offered me the Field Intelligence Officer position and the Domestic Violence Unit — both of which carry significant overtime and promotion potential. When I refused, he became visibly angry. I understood these offers to be a bribe in exchange for my silence about the assault.
18. The retaliation was not limited to me. Lieutenant Mellerson, who reported my assault to the OEEO, had his tour changed after making that report. Lieutenant Lawyerr made statements in front of other officers warning them to beware of “two-legged rats” and stating that he had “Jewish lawyers for protection.” These statements created an atmosphere of intimidation that discouraged other officers from supporting me or cooperating with the investigation.
19. As a result of the retaliation and the denial of the specialized assignments I was qualified for, my income in 2025 was approximately \$130,141 — nearly \$20,000 less than the prior year. Officers who received the positions I was denied earned between \$27,000 and \$53,000 more than I did.

**Why I Should Not Be Required to Transfer**

20. I have been assigned to the 46th Precinct since July 2020 — nearly six years. I have built my career here. I have professional relationships, familiarity with the community, and seniority within the command. Defendant Scheublin arrived in December 2023 and assaulted me thirteen months later.
21. I should not be required to transfer because Defendant Scheublin is well known within the NYPD and may have his peers retaliate against me or create a hostile work environment at any command I am transferred to. I did nothing wrong. I reported through every available channel. Requiring me to leave while Defendant Scheublin faces no consequences would punish me for his crime and send a message to every officer in the NYPD that reporting sexual assault by a superior means losing your career, not his.
22. I am asking this Court to direct the City to do what it should have done fourteen months ago: place Defendant Scheublin on modified duty, take away his weapon, and ensure he has no authority over my career or my safety.

**Surveillance Camera Tampering**

23. After I reported the assault, I noticed that a surveillance camera within the 46th Precinct had been moved from its prior position. This camera had previously captured Defendant Scheublin's parking spot outside the precinct.
24. The desk sergeant reported that the cameras had been moved, and someone came to fix them. I notified IAB regarding the cameras being moved. IAB stated they were aware and working on rectifying the issue.
25. Shortly after the cameras were fixed, they were tampered with again. The cameras were tampered with on multiple occasions — each time they were restored, they were

repositioned again. This repeated tampering caused me significant fear and anxiety. I believed — and continue to believe — that the cameras were moved to eliminate evidence relevant to the investigation and to intimidate me.

**Current Situation and Urgency**

26. Although Defendant Scheublin was transferred from the 46th Precinct to Patrol Borough Bronx on January 12, 2026, this transfer did not make me safe. Patrol Borough Bronx oversees the 46th Precinct. The 48th Precinct, where Patrol Borough Bronx is located, is approximately one mile from the 46th Precinct — walking distance. Defendant Scheublin remains within my broader chain of command. He remains on full duty. He remains armed.
27. I continue to experience fear and distress knowing that the man who sexually assaulted me retains institutional authority within the NYPD and carries a service weapon every day. The NYPD's refusal to modify his duty status, even after a criminal referral by its own Internal Affairs Bureau and an active investigation by the Bronx District Attorney, tells me that the department has chosen to protect him rather than me.
28. I have cooperated fully with both the NYPD Internal Affairs Bureau and the Bronx County District Attorney's Office throughout their investigation. I have met with the Bronx DA's office on three separate occasions. I have done everything asked of me. I am not asking for special treatment. I am asking to be safe at work.
29. I respectfully request that this Court issue a temporary restraining order and preliminary injunction directing the City of New York to place Defendant Scheublin on modified duty without his service firearm, remove him from any supervisory authority over me, and

ensure that he has no contact with me. I should not have to choose between my career and my safety.

Dated: March 20, 2026

Bronx, NY

*N.T. /s/*

**N.T.**