

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
DONNA Y. CASTILLO-DIAZ

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK, ROMAIN L. WILSON,  
DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON,  
and MARIA TERESA CASTALDI

Defendants  
-----X

To the Defendant named above:

You are hereby summoned and required to serve a written answer to the attached Verified Complaint upon the Plaintiff's attorney at the address below.

If this Summons is personally delivered to you within the State of New York, you must serve your answer within twenty (20) days after such service, exclusive of the service date.

If this Summons is served upon you in any other manner authorized by law, you must serve your answer within thirty (30) days after service is complete, as provided by the New York Civil Practice Law and Rules.

Should you fail to appear or answer within the applicable period stated above, judgment may be entered against you by default for the relief demanded in the Verified Complaint, without further notice.

This action is venued in the Supreme Court of the State of New York, County of the Bronx, 851 Grand Concourse, Bronx, New York 10451.

Dated: May 25, 2026  
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders  
Attorney for Plaintiff DONNA Y. CASTILLO-DIAZ

**THE SANDERS FIRM, P.C.**  
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DEFENDANT ADDRESSES

THE CITY OF NEW YORK  
c/o New York City Law Department  
Office of the Corporation Counsel  
100 Church Street  
New York, New York 10007

Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, and JAMAL  
HAIRSTON  
Police Department City of New York  
c/o Transit District No. 11  
East 161<sup>st</sup> Street and River Avenue  
Bronx, New York 10451

Defendant MARIA TERESA CASTALDI  
Police Department City of New York  
c/o Medical Division  
One Lefrak City Plaza  
Corona, New York 11373

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON,  
and MARIA TERESA CASTALDI

Defendants  
-----X

Plaintiff DONNA Y. CASTILLO-DIAZ, by her attorney THE SANDERS FIRM, P.C.,  
complaining of defendants THE CITY OF NEW YORK, ROMAINÉ L. WILSON, DARNELL S.  
JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI, alleges as  
follows:

**INTRODUCTION**

Plaintiff DONNA Y. CASTILLO-DIAZ is a Dominican woman and New York City  
police officer assigned to Transit District 11. She has approximately ten years in that command  
and previously worked in the Transit District 11 Administrative Office for approximately six  
years before defendant ROMAINÉ L. WILSON removed her from that position shortly after  
arriving as the new commanding officer.

This action arises from defendants' discriminatory, sexually offensive, disability-based,  
hostile, and retaliatory treatment of plaintiff after she had already complained about sexual  
harassment within the same command. Before defendant WILSON'S arrival, plaintiff filed a  
Charge of Discrimination with the United States Equal Employment Opportunity Commission

alleging that defendant THE CITY OF NEW YORK, through the Police Department City of New York, commonly known as the NYPD, failed to protect her from sexual harassment and hostile work environment inside Transit District 11. Plaintiff's prior complaint concerned sexual harassment by Sergeant Alexander Pimentel, including unwanted comments, sexually offensive touching, workplace monitoring, sexually provocative conduct, and retaliation after plaintiff complained internally.

Transit District 11 is a small command. Plaintiff alleges that, because of the size of the command, employees and supervisors became aware of her prior sexual-harassment allegations. Before she filed her Charge of Discrimination, plaintiff describes the workplace as challenging but manageable. After she filed the Charge, plaintiff felt an immediate shift. Male and female employees, including police officers and supervisors, began distancing themselves from her. Plaintiff alleges that this reaction reflected a broader NYPD culture in which complaining about police misconduct, discriminatory workplace conduct, and sexual harassment is treated as taboo.

On June 6, 2024, plaintiff received a Notice of Right to Sue. On July 3, 2024, she filed a federal complaint in the United States District Court for the Southern District of New York under Docket No. 24-cv-05074. In that federal action, plaintiff alleged that Sergeant Pimentel sexually harassed her while she was assigned to Transit District 11 by subjecting her to unwanted touching, comments, monitoring through department camera equipment, sexually provocative photographs of himself, grabbing her wrist, taking her personal cellular telephone, nibbling her ear, touching her neck, and confronting her after she complained to the NYPD Office of Equity and Inclusion.

During the pendency of the federal action, plaintiff, defendant THE CITY OF NEW YORK, and Sergeant Pimentel participated in the federal court mediation program on or about

October 31, 2024. The matter was financially resolved. Plaintiff voluntarily dismissed the federal complaint on or about December 4, 2024, subject to receipt of the settlement payment, and received the settlement payment on or about April 8, 2025.

Although the prior action was financially resolved, plaintiff alleges that the settlement did not resolve the workplace consequences of the sexual harassment and retaliation she experienced. Plaintiff alleges that her experience with the department and Sergeant Pimentel caused her to distrust male supervisors and male coworkers and shaped how she experienced defendants' later conduct. Plaintiff further alleges that sexual harassment within Transit District 11 was not limited to her experience, and that at least three other Hispanic female officers have been subjected to similar boorish sexual harassment but fear retaliation if they complain.

After defendant WILSON arrived at Transit District 11, plaintiff alleges that defendants continued the pattern rather than correcting it. Defendant WILSON removed plaintiff from her long-held administrative position after she completed substantial command-support work; defendant DARNELL S. JONES allegedly targeted plaintiff through assignment pressure, overtime scrutiny, and opposition to her accommodation; defendant DAVID PABON allegedly stigmatized plaintiff as a "snake" and participated in retaliatory discipline; defendant JAMAL HAIRSTON allegedly subjected plaintiff and other female officers to unwanted sexualized comments; and defendant MARIA TERESA CASTALDI allegedly subjected plaintiff to disability-based hostility after plaintiff disclosed her Raynaud's disease and sought workplace protection.

Plaintiff brings this action under the New York State and New York City Human Rights Law for Race and National Origin Discrimination, Sexual Harassment, Disability Discrimination, Hostile Work Environment, and Retaliation.

### **JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction over this action pursuant to N.Y. Const. art. VI, § 7(a) and CPLR § 301, because plaintiff asserts civil claims arising under the New York State Human Rights Law and the New York City Human Rights Law, together with related claims arising from defendants' employment-related conduct within the State of New York.

2. This Court has personal jurisdiction over defendant THE CITY OF NEW YORK pursuant to CPLR § 301, because THE CITY OF NEW YORK is a municipal corporation organized under the laws of the State of New York and conducts governmental, administrative, employment, and police operations throughout the City of New York, including Bronx County.

3. This Court has personal jurisdiction over defendants ROMAINÉ L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI pursuant to CPLR § 301 and/or CPLR § 302(a)(1), because, at all relevant times, they resided in, worked in, transacted business in, performed official duties in, or committed acts within the State of New York giving rise to plaintiff's claims.

4. Venue is proper in Bronx County pursuant to CPLR § 503(a) because a substantial part of the events or omissions giving rise to plaintiff's claims occurred in Bronx County, including plaintiff's assignment to Transit District 11, defendants' alleged workplace conduct, plaintiff's removal from the Administrative Office, the alleged hostile work environment, the alleged retaliatory assignment practices, the alleged opposition to plaintiff's reasonable accommodation, and the alleged retaliatory discipline. CPLR § 503(a) permits venue in the county where a substantial part of the events or omissions giving rise to the claim occurred.

5. Venue is also proper in Bronx County pursuant to CPLR § 504(3) because this is an action against THE CITY OF NEW YORK and its officers, employees, agents, or departments, and the cause of action arose principally within the City of New York, with the primary nucleus of operative facts occurring in Bronx County. CPLR § 504(3) provides that actions against the City of New York shall be tried in the county within the City where the cause of action arose, or, if it arose outside the City, in New York County.

6. Venue is further supported because certain relevant acts, communications, assignments, decision-making, internal complaint activity, medical-review activity, and administrative processing occurred, or are expected to have occurred, in Bronx County, New York County, Queens County, and Westchester County.

7. Although facts relevant to this action touch Bronx, New York, Queens, and Westchester Counties, Bronx County remains the proper venue because the principal employment relationship, command-level conduct, retaliatory acts, hostile work environment, reasonable-accommodation dispute, and discipline alleged in this action arose primarily from plaintiff's assignment to Transit District 11 and defendants' conduct affecting plaintiff's terms, conditions, and privileges of employment there.

#### **PROCEDURAL REQUIREMENTS**

8. Plaintiff has satisfied, or will timely satisfy, all procedural requirements necessary to maintain this action under the New York State Human Rights Law and the New York City Human Rights Law.

9. Plaintiff first asserts legal claims under the New York State Human Rights Law. Executive Law § 297(9) authorizes an aggrieved person to bring a civil action in a court of appropriate jurisdiction, subject to the statute's election-of-remedies provisions. Plaintiff has not

elected an administrative remedy before the New York State Division of Human Rights that would bar this civil action under Executive Law § 297(9).

10. Plaintiff is not required to file or serve a Notice of Claim as a condition precedent to asserting New York State Human Rights Law claims against defendant THE CITY OF NEW YORK or the individual defendants. The New York Court of Appeals held in *Margerum v. City of Buffalo*, 24 N.Y.3d 721 (2015), that a notice of claim is not required for Human Rights Law claims against a municipality.

11. Plaintiff's New York State Human Rights Law claims are timely because they arise from discriminatory and retaliatory acts occurring within the applicable limitations period, including plaintiff's removal from administration, renewed sexualized conduct, assignment targeting, disability-related mistreatment, reasonable-accommodation interference, and retaliatory discipline.

12. Plaintiff next asserts legal claims under the New York City Human Rights Law. New York City Administrative Code § 8-502(a) authorizes any person claiming to be aggrieved by an unlawful discriminatory practice to bring a civil action in a court of competent jurisdiction.

13. Plaintiff has not elected an administrative remedy before the New York City Commission on Human Rights that would bar this civil action under Administrative Code § 8-502(a).

14. Pursuant to New York City Administrative Code § 8-502(c), within ten days after commencing this action, plaintiff will serve a copy of the complaint upon the New York City Commission on Human Rights and the Corporation Counsel of the City of New York.

15. Plaintiff's New York City Human Rights Law claims are timely because Administrative Code § 8-502(d) provides that a civil action must be commenced within three years after the alleged unlawful discriminatory practice occurred.

16. To the extent plaintiff references earlier events, including her prior sexual-harassment complaint, EEOC charge, federal action, mediation, voluntary dismissal, and settlement payment, those facts are pleaded as background, notice, motive, context, pattern, and evidence of defendants' knowledge of plaintiff's protected activity, defendants' failure to prevent continuing workplace misconduct, and defendants' retaliatory animus.

**PLAINTIFF**

17. Plaintiff DONNA Y. CASTILLO-DIAZ is a Dominican woman and a police officer employed by defendant THE CITY OF NEW YORK through the Police Department City of New York, commonly known as the New York City Police Department.

18. Plaintiff is currently assigned to Transit District 11 and has approximately ten years of service within that command.

19. Before the events giving rise to this action, plaintiff worked in the Transit District 11 Administrative Office for approximately six years, where she performed substantial administrative responsibilities for the command, including scheduling, personnel coordination, overtime-related work, administrative records, and assistance with command operations.

20. Plaintiff previously engaged in protected activity after being subjected to sexual harassment within Transit District 11. On or about October 23, 2023, plaintiff filed a Charge of Discrimination with the United States Equal Employment Opportunity Commission alleging sexual harassment in the workplace.

21. On or about July 3, 2024, plaintiff commenced a federal civil-rights action in the United States District Court for the Southern District of New York, under Docket No. 24-cv-05074, arising from allegations that Sergeant Alexander Pimentel sexually harassed her while she was assigned to Transit District 11.

22. Plaintiff's prior federal action alleged, among other things, that Sergeant Pimentel subjected her to unwanted touching, sexualized comments, workplace monitoring, sexually provocative photographs, physical grabbing, interference with her personal cellular telephone, touching of her neck, nibbling of her ear, and confrontation after she complained internally.

23. Plaintiff resolved the prior federal action through a financial settlement. The matter was voluntarily dismissed on or about December 4, 2024, and plaintiff received the settlement payment on or about April 8, 2025.

24. Plaintiff alleges that her prior sexual-harassment complaint, EEOC charge, federal lawsuit, and settlement became widely known within Transit District 11 and caused her to be treated differently by members of the command.

25. Plaintiff further alleges that after the prior matter was financially resolved, she continued to experience workplace hostility, retaliation, sexualized conduct, disability-based mistreatment, and adverse assignment and disciplinary actions within Transit District 11.

### **DEFENDANTS**

26. Defendant THE CITY OF NEW YORK is a municipal corporation organized under the laws of the State of New York and is the employer of plaintiff DONNA Y. CASTILLO-DIAZ through the Police Department City of New York, commonly known as the New York City Police Department.

27. At all relevant times, defendant THE CITY OF NEW YORK operated, managed, supervised, and controlled the New York City Police Department, including Transit District 11, its command staff, supervisors, employees, internal complaint processes, disciplinary systems, medical-duty processes, and reasonable-accommodation procedures.

28. Defendant ROMAINE L. WILSON is a captain employed by defendant THE CITY OF NEW YORK through the NYPD and, at all relevant times, served as the commanding officer of Transit District 11.

29. At all relevant times, defendant WILSON acted under color of authority as plaintiff's commanding officer and had supervisory authority over plaintiff's assignments, working conditions, command placement, administrative duties, and related terms and conditions of employment.

30. Defendant DARNELL S. JONES is a lieutenant employed by defendant THE CITY OF NEW YORK through the NYPD and, at all relevant times, served in a supervisory and administrative role at Transit District 11.

31. At all relevant times, defendant JONES acted under color of authority as an NYPD supervisor and participated in, influenced, or affected plaintiff's assignments, overtime-related scrutiny, detail assignments, administrative placement, and reasonable-accommodation process.

32. Defendant DAVID PABON is a lieutenant employed by defendant THE CITY OF NEW YORK through the NYPD and, at all relevant times, served at Transit District 11, including in the role of Integrity Control Officer.

33. At all relevant times, defendant PABON acted under color of authority as an NYPD supervisor and participated in, influenced, or affected disciplinary action, command-level scrutiny, and employment-related decisions concerning plaintiff.

34. Defendant JAMAL HAIRSTON is a detective specialist employed by defendant THE CITY OF NEW YORK through the NYPD and, at all relevant times, served at Transit District 11, including in an administrative or operator-related role.

35. At all relevant times, defendant HAIRSTON acted under color of authority as an NYPD employee assigned to Transit District 11 and participated in conduct affecting plaintiff's workplace environment, including alleged unwanted sexualized comments and conduct.

36. Defendant MARIA TERESA CASTALDI is a medical professional employed by, assigned to, or acting on behalf of defendant THE CITY OF NEW YORK and/or the NYPD Medical Division.

37. At all relevant times, defendant CASTALDI acted under color of authority in connection with plaintiff's medical-duty status, medical review, fitness-for-duty issues, and disability-related employment matters.

### **BACKGROUND**

#### **Plaintiff's Prior Protected Activity and the Transit District 11 Sexual-Harassment History**

38. Plaintiff DONNA Y. CASTILLO-DIAZ is a Dominican woman employed by defendant THE CITY OF NEW YORK as a New York City police officer.

39. Plaintiff is assigned to Transit District 11 and has served in that command for approximately ten years.

40. Before the events giving rise to this action, plaintiff worked in the Transit District 11 Administrative Office for approximately six years.

41. During that time, plaintiff performed significant administrative, scheduling, personnel, overtime, and command-support duties.

42. Prior to defendant ROMAINÉ L. WILSON'S arrival at Transit District 11, plaintiff engaged in protected activity by complaining of sexual harassment in the workplace.

43. On or about October 23, 2023, plaintiff filed a Charge of Discrimination with the United States Equal Employment Opportunity Commission alleging sexual harassment within Transit District 11.

44. Plaintiff's prior Charge of Discrimination concerned sexual harassment and sexually offensive conduct by Sergeant Alexander Pimentel, who was then assigned within plaintiff's workplace.

45. Plaintiff alleged that Sergeant Pimentel subjected her to unwanted touching, sexualized comments, workplace monitoring, sexually provocative conduct, interference with her personal cellular telephone, and retaliation after she complained internally.

46. On or about June 6, 2024, plaintiff was issued a Notice of Right to Sue.

47. On or about July 3, 2024, plaintiff commenced a federal civil-rights action in the United States District Court for the Southern District of New York under Docket No. 24-cv-05074.

48. The federal action alleged that defendant THE CITY OF NEW YORK, through the NYPD, failed to protect plaintiff from sexual harassment, hostile work environment, and retaliation within Transit District 11.

49. On or about October 31, 2024, plaintiff, defendant THE CITY OF NEW YORK, and Sergeant Pimentel participated in mediation through the federal court mediation program.

50. The prior federal action was financially resolved.

51. On or about December 4, 2024, plaintiff voluntarily dismissed the prior federal action subject to receipt of the financial settlement.

52. On or about April 8, 2025, plaintiff received the settlement payment.

53. Although the prior action was financially resolved, the workplace consequences did not end.

54. Plaintiff alleges that her prior sexual-harassment complaint, EEOC Charge of Discrimination, federal lawsuit, mediation, dismissal, and settlement became known within Transit District 11.

55. Plaintiff further alleges that after her protected activity became known, members of the command began treating her differently.

56. Plaintiff observed that male and female employees, including police officers and supervisors, became more distant and standoffish toward her.

57. Plaintiff alleges that the shift in treatment reflected the culture within the NYPD that discourages employees from complaining about police misconduct, discriminatory conduct, and sexual harassment.

58. Plaintiff further alleges that sexual harassment within Transit District 11 was not limited to her own experience.

59. Plaintiff is aware of other Hispanic female officers who allegedly experienced similar sexually offensive workplace conduct, but are afraid to complain because they fear retaliation.

60. Plaintiff alleges that this command environment forms part of the context for defendants' later discriminatory, sexually offensive, hostile, disability-based, and retaliatory treatment of her.

**Defendant Wilson's Arrival and Plaintiff's Administrative Role**

61. In or around June 2025, defendant ROMAINE L. WILSON was assigned as the commanding officer of Transit District 11.

62. At or around the time defendant WILSON arrived, plaintiff was out sick but continued to support the command remotely.

63. Plaintiff had previously worked in the Administrative Office for approximately six years and was familiar with the command's scheduling, staffing, personnel, and administrative needs.

64. Plaintiff's administrative work was substantial and important to the command's daily operations.

65. Prior to defendant WILSON'S arrival, Captain Melissa Baylor had left Transit District 11.

66. During the transition period before defendant WILSON fully assumed command, plaintiff assisted with significant administrative work inside Transit District 11.

67. After the meeting, plaintiff spoke with Lieutenant Yaw Offin.

68. Lieutenant Offin confirmed to plaintiff, in sum and substance, that defendant WILSON'S stated reason for removing plaintiff from the Administrative Office was not true.

69. Lieutenant Offin further confirmed that he had advocated for plaintiff to remain in the Administrative Office.

70. Defendant WILSON rejected Lieutenant Offin's recommendation.

71. Plaintiff alleges that Lieutenant Offin understood, or should have understood, that defendant WILSON'S sudden removal of plaintiff from the Administrative Office, based on a

false and undocumented accusation, raised concerns of discriminatory animus and retaliation in the workplace.

72. Plaintiff further alleges that Lieutenant Offin, as a police supervisor and member of the Transit District 11 management structure, failed to report defendant WILSON'S discriminatory and retaliatory conduct to the Office of Equity and Inclusion, the Internal Affairs Bureau, or any other appropriate NYPD authority.

73. Plaintiff does not allege that Lieutenant Offin acted with the same retaliatory intent as defendants WILSON and JONES; rather, plaintiff alleges that his failure to report or intervene reflects the NYPD's broader failure to protect employees who complain about discrimination, sexual harassment, hostile work environment, and retaliation.

74. The Detective Specialist recommendation did not result in a promotion or designation for plaintiff.

75. Plaintiff alleges that after defendant WILSON'S arrival, his first interactions with her were negative.

76. When defendant WILSON entered the Administrative Office, he would acknowledge and address Lieutenant Offin but would not directly acknowledge plaintiff.

77. Plaintiff began to question whether defendant WILSON had learned about her prior sexual-harassment complaint, EEOC charge, federal lawsuit, and settlement.

78. In or around July and August 2025, Transit District 11 was preparing to transition personnel from twelve-hour patrol tours back to eight-hour-and-thirty-five-minute tours.

79. Plaintiff was heavily involved in that transition process.

80. Plaintiff assisted with planning, spreadsheets, personnel movement, scheduling issues, and administrative coordination.

81. Plaintiff also communicated with Labor Relations and other NYPD management personnel regarding the tour transition.

82. The bulk of plaintiff's work on the tour transition occurred between the end of July 2025 and August 5, 2025.

83. Plaintiff's work on the tour transition benefitted Transit District 11, defendant WILSON, command management, and other stakeholders responsible for staffing and delivering police services.

84. Plaintiff alleges that she completed substantial administrative work for the command immediately before she was removed from her administrative position.

#### **August 6, 2025 Removal from Administration**

85. On or about August 6, 2025, shortly after the tour-transition work was completed, defendant WILSON directed Police Officer Carl Ervin, a PBA Delegate, to have plaintiff attend a mandatory meeting.

86. Plaintiff complied with the instruction and went to defendant WILSON'S office.

87. The meeting was attended by defendant WILSON, defendant DARNELL S. JONES, Lieutenant Offin, and Police Officer Ervin.

88. When plaintiff entered defendant WILSON'S office, the door was closed.

89. Defendant WILSON was seated at his desk.

90. Defendant JONES, Lieutenant Offin, and Police Officer Ervin were positioned behind plaintiff.

91. Plaintiff felt uncomfortable during the meeting because of her prior experience with male NYPD supervisors and her prior sexual-harassment experience in the same command.

92. Plaintiff alleges that defendant WILSON and the other supervisors present were aware, or should have been aware, of her prior sexual-harassment complaint and federal lawsuit.

93. Defendant WILSON told plaintiff that he was making changes in the command.

94. Defendant WILSON directed plaintiff to pick a patrol squad.

95. Plaintiff asked defendant WILSON why she was being removed from the Administrative Office.

96. Defendant WILSON stated, in sum and substance, that he had received complaints that plaintiff yelled at other officers.

97. Plaintiff denied that accusation.

98. Plaintiff alleges that defendant WILSON'S stated reason was false.

99. Plaintiff was not provided the names of any officers who allegedly complained about her.

100. Plaintiff was not shown any written complaint.

101. Plaintiff was not counseled before the removal.

102. Plaintiff was not disciplined before the removal.

103. Plaintiff was not given a meaningful opportunity to respond before being removed from the Administrative Office.

104. Plaintiff alleges that defendant WILSON knew the sudden removal would create a hardship for her work schedule, family responsibilities, caretaking obligations, and marriage.

105. Plaintiff further alleges that defendant WILSON removed her from administration anyway.

106. Within minutes, plaintiff was forced to select Squad B-2.

107. After the meeting, plaintiff spoke with Lieutenant Offin.

108. Lieutenant Offin confirmed to plaintiff, in sum and substance, that defendant WILSON'S stated reason for removing plaintiff was not true.

109. Lieutenant Offin further confirmed that he had advocated for plaintiff to remain in the Administrative Office.

110. Defendant WILSON rejected Lieutenant Offin's recommendation.

111. Between approximately August 6, 2025 and August 13, 2025, plaintiff transitioned to Squad B-2 under Sergeant Ariel Torres.

112. Plaintiff alleges that her removal from the Administrative Office was not a neutral staffing decision.

113. Plaintiff alleges that the removal was discriminatory and retaliatory, and occurred after her prior protected activity became known within the command.

#### **Defendant Wilson's Sexually Offensive Conduct After Plaintiff's Removal**

114. After plaintiff transitioned to Squad B-2, she continued performing her duties.

115. Under Sergeant Torres, plaintiff's work environment was initially uneventful.

116. Plaintiff made arrests, issued summonses, and continued working hard.

117. On or about August 15, 2025, plaintiff attended the Transit District 11 barbecue at Tibbetts Brook Park in Yonkers, New York.

118. When plaintiff arrived, she observed defendant WILSON speaking with defendant JONES and Lieutenant Offin away from the group.

119. Plaintiff was speaking with other police officers.

120. Defendant WILSON then began walking toward plaintiff.

121. As defendant WILSON approached, the other officers left the area.

122. Plaintiff became apprehensive because her prior interactions with defendant WILSON had been negative.

123. Defendant WILSON approached plaintiff and stated, in sum and substance, “Hey, I see you Donna doing your thing.”

124. Defendant WILSON further stated, in sum and substance, “I see that you collared already and you issued 8 summonses. That’s great work. Keep it up. I see you.”

125. Plaintiff perceived defendant WILSON’S tone and manner as flirtatious, intrusive, and uncomfortable.

126. Plaintiff was particularly uncomfortable because defendant WILSON’S comments made her feel watched and monitored.

127. Plaintiff connected defendant WILSON’S conduct to her prior experience with Sergeant Pimentel, who had allegedly monitored her in the workplace before escalating to sexually offensive conduct.

128. After the interaction, defendant WILSON returned to the area where defendant JONES and Lieutenant Offin were located.

129. During the following weeks, defendant WILSON repeatedly called out to plaintiff in the hallways.

130. Defendant WILSON stated, in sum and substance, “Hey Donna, I see you,” or “I see youuuu.”

131. Plaintiff alleges that defendant WILSON used a raised, prolonged, and flirtatious tone when making these comments.

132. Plaintiff alleges that defendant WILSON’S body movements and delivery made the comments feel personal, intrusive, and sexualized.

133. Plaintiff did not encourage, invite, or welcome defendant WILSON'S conduct.

134. Plaintiff responded only briefly and attempted to continue walking away.

135. Plaintiff perceived defendant WILSON'S conduct as especially troubling because he had already removed her from the Administrative Office.

136. Plaintiff further perceived the conduct as part of a pattern of watching and targeting her after her prior protected activity.

137. On or about September 7, 2025, plaintiff and her partner, Police Officer Melanie Acevedo, were handling an attempted robbery assignment in the subway system near the East 149th Street and Grand Concourse station.

138. Defendants WILSON and JAMAL HAIRSTON responded to that assignment.

139. While plaintiff and Police Officer Acevedo were interviewing the complainant and securing the arrestee, defendant WILSON approached plaintiff.

140. Defendant WILSON directed plaintiff to turn off her body-worn camera.

141. Plaintiff believed this instruction was inconsistent with department policy and her tactical training.

142. Plaintiff complied because she feared being suspended, disciplined, or further humiliated by defendant WILSON.

143. Defendant WILSON isolated plaintiff off to the side.

144. Defendant WILSON told plaintiff, in substance, that he wanted to commend her for not taking his prior actions personally.

145. Plaintiff understood defendant WILSON to be referring to his abrupt removal of her from the Administrative Office and reassignment to Squad B-2.

146. Defendant WILSON then asked plaintiff if she wanted her administrative position back.

147. Plaintiff was shocked and afraid.

148. Plaintiff did not want to offend defendant WILSON because she feared further retaliation.

149. Plaintiff accepted the offer even though she did not want to work near defendant WILSON, defendant JONES, or defendant HAIRSTON.

150. Defendant WILSON told plaintiff that the transfer back to administration would occur upon her return from vacation on or about September 18, 2025.

151. When plaintiff returned from vacation, she remained assigned to Squad B-2.

152. Plaintiff was not returned to the Administrative Office.

153. Plaintiff alleges that defendant WILSON'S conduct was sexually offensive, manipulative, retaliatory, and part of a continuing hostile work environment.

**Defendant Hairston's Sexually Offensive Conduct Toward  
Plaintiff and Other Female Officers**

154. During plaintiff's transition to Squad B-2, defendant WILSON transferred defendant JAMAL HAIRSTON into an administrative role and made him his operator.

155. After defendant HAIRSTON was placed into the administrative role, he began making unwanted flirtatious and sexualized comments toward plaintiff.

156. Defendant HAIRSTON also made unwanted flirtatious and sexualized comments toward other female officers, including Police Officer Melanie Acevedo.

157. Defendant HAIRSTON'S conduct began in or around August 2025.

158. Defendant HAIRSTON'S conduct continued through approximately mid-October 2025.

159. Defendant HAIRSTON made comments to plaintiff including words to the effect of, “Look at her, the light of my eyes.”

160. Defendant HAIRSTON also made comments to plaintiff including words to the effect of, “My goddess walking my way.”

161. Defendant HAIRSTON made additional comments suggesting that he should bring plaintiff back into the Administrative Office.

162. Defendant HAIRSTON suggested that plaintiff should sit beside him.

163. Defendant HAIRSTON suggested that plaintiff should work for him.

164. Plaintiff found defendant HAIRSTON’S comments unwanted, sexualized, and degrading.

165. Plaintiff did not welcome defendant HAIRSTON’S comments.

166. Plaintiff did not invite defendant HAIRSTON’S comments.

167. Plaintiff did not reciprocate defendant HAIRSTON’S comments.

168. Plaintiff found defendant HAIRSTON’S conduct offensive and inappropriate.

169. Defendant HAIRSTON knew, or should have known, that plaintiff had previously endured sexual harassment within Transit District 11.

170. Plaintiff alleges that defendant HAIRSTON’S conduct was especially disturbing because it occurred after plaintiff had already complained of sexual harassment by another male supervisor in the same command.

171. Plaintiff avoided defendant HAIRSTON as much as possible.

172. Plaintiff avoided defendant HAIRSTON because she feared retaliation.

173. Plaintiff believed defendant HAIRSTON was aligned with defendant WILSON.

174. Plaintiff also believed defendant HAIRSTON was aligned with defendant JONES.

175. Plaintiff feared that if she complained about defendant HAIRSTON, defendants WILSON and JONES could retaliate against her by changing her chart, assigning her late tours or midnights, assigning undesirable details, or otherwise making her working conditions worse.

176. Plaintiff alleges that defendant HAIRSTON'S conduct contributed to a sexually hostile work environment at Transit District 11.

177. Plaintiff further alleges that defendant HAIRSTON'S conduct toward other female officers demonstrates that the sexualized conduct was not isolated to plaintiff.

178. Plaintiff alleges that Hispanic female officers within Transit District 11 were subjected to similar boorish and sexualized conduct and were afraid to complain because they feared retaliation.

**Defendant Jones's Administrative Role, Assignment Targeting, and Overtime Scrutiny**

179. In or around late October 2025, defendant WILSON removed Lieutenant Offin from the Administrative Office.

180. Defendant WILSON then placed defendant JONES into the administrative role.

181. Plaintiff alleges that defendant WILSON presented the change as part of his command administration.

182. Plaintiff alleges that the change was retaliatory against both plaintiff and Lieutenant Offin because Lieutenant Offin had advocated for plaintiff to remain in the Administrative Office.

183. After defendant JONES entered the administrative role, plaintiff's interactions with him changed.

184. Before that point, defendant JONES had been professional toward plaintiff.

185. After assuming the administrative role, defendant JONES began glaring at plaintiff.

186. Defendant JONES used aggressive mannerisms toward plaintiff.

187. Defendant JONES ignored plaintiff's greetings.

188. Defendant JONES acknowledged other officers while ignoring plaintiff.

189. Plaintiff alleges that defendant JONES'S change in treatment reflected hostility toward her.

190. Plaintiff further alleges that defendant JONES was placed in the administrative role so he could participate in retaliatory assignment decisions and other personnel movements affecting plaintiff.

191. On or about December 2, 2025, Police Officer Deyaniris Olivero, who was assigned to the Administrative Office, contacted plaintiff regarding an overtime swap.

192. Plaintiff had previously asked her squad sergeant, Sergeant Ariel Torres, for permission to swap overtime with another officer.

193. Plaintiff had a Raptor overtime slot on November 27, 2025, from 1540 hours to 1940 hours.

194. The other officer had a pre-tour high-visibility overtime slot early on November 28, 2025.

195. Sergeant Torres approved the overtime swap.

196. Overtime swaps were common within Transit District 11.

197. Plaintiff alleges that she followed the chain of command by seeking approval from Sergeant Torres.

198. The next time plaintiff interacted with defendant JONES, he demanded to know who authorized the swap.

199. Plaintiff explained that Sergeant Torres had approved the swap.

200. Defendant JONES stated, in substance, that from that point forward no such moves would be made without Administrative Office approval.

201. Plaintiff was confused because she had already obtained supervisory approval.

202. Plaintiff alleges that the issue was not the overtime swap itself, but the fact that plaintiff had requested and received approval for the swap.

203. Plaintiff further alleges that defendant JONES should have addressed any supervisory concern with Sergeant Torres, not with plaintiff.

204. Plaintiff alleges that both she and Sergeant Torres are Hispanic employees and that defendant JONES targeted the matter because of discriminatory and retaliatory animus.

205. Plaintiff's sister-in-law had previously warned plaintiff that when defendant JONES was assigned to the 47th Precinct, he made derogatory comments about Dominican women.

206. Plaintiff's sister-in-law also informed plaintiff that defendant JONES placed derogatory comments about Dominican women in a group chat.

207. Shortly after the overtime-swap issue, plaintiff began receiving a steady stream of outside details and undesirable assignments.

208. Plaintiff heard defendant JONES ask Police Officer Olivero, in sum and substance, "Why isn't Castillo on any details? Send her send her."

209. Plaintiff alleges that defendant JONES used the administrative assignment process to target her.

210. Plaintiff alleges that the increased details and undesirable assignments were discriminatory and retaliatory.

211. Plaintiff further alleges that defendant JONES'S conduct was part of a continuing hostile work environment.

**December 19, 2025 OEI/IAB Activity**

209. By December 2025, plaintiff remained fearful of retaliation and disrespect by defendants WILSON, JONES, and HAIRSTON.

210. Plaintiff had already experienced a prior negative response from the NYPD's internal EEO/OEI process during the Pimentel matter.

211. Despite that prior experience, plaintiff again contacted the NYPD's Office of Equity and Inclusion on or about December 19, 2025.

212. Plaintiff contacted the Office of Equity and Inclusion regarding the conduct of defendants JONES and HAIRSTON.

213. Plaintiff did not initially report defendant WILSON because she feared that, as commanding officer, he could make her work life worse.

214. Plaintiff alleges that she was under stress when she contacted the Office of Equity and Inclusion.

215. Plaintiff further alleges that the Office of Equity and Inclusion intake process was insensitive, impatient, and discouraging.

216. Plaintiff spoke with defendant Sergeant Gustavo E. Montesdeoca during the intake process.

217. Sergeant Montesdeoca was assigned to the Office of Equity and Inclusion.

218. Plaintiff alleges that Sergeant Montesdeoca was less than helpful.

219. Plaintiff alleges that Sergeant Montesdeoca did not take sufficient time to understand her allegations.

220. Plaintiff alleges that Sergeant Montesdeoca was impatient during the intake.

221. Plaintiff alleges that Sergeant Montesdeoca appeared more interested in dissuading her than assisting her.

222. Plaintiff reported allegations that included discrimination, sexual harassment, hostile work environment, and retaliation.

223. Instead of treating plaintiff's report as a discrimination, sexual harassment, hostile work environment, and retaliation complaint, the matter was referred to the Internal Affairs Bureau.

224. The Office of Equity and Inclusion assigned the matter Log No. 2025-1118.

225. The Internal Affairs Bureau assigned the matter Log No. 2025-40352.

226. The Internal Affairs Bureau matter concerned abuse of authority allegations involving defendants JONES and HAIRSTON.

227. Plaintiff alleges that the referral to the Internal Affairs Bureau improperly narrowed and diverted her workplace-discrimination complaint.

228. Plaintiff further alleges that the mishandling of her complaint was consistent with the NYPD's failure to protect her from discrimination, sexual harassment, hostile work environment, and retaliation.

229. Plaintiff alleges that her December 19, 2025 complaint constituted additional protected activity.

230. Plaintiff alleges that defendants THE CITY OF NEW YORK and NYPD management personnel had notice of her protected activity and the continuing discriminatory and retaliatory conditions in Transit District 11.

**Medical Condition, Absence Control, and Raynaud's Diagnosis**

231. On or about February 28, 2026, plaintiff was assigned to work in cold conditions for several hours while posted outside.

232. During that assignment, plaintiff experienced severe symptoms in her feet.

233. Plaintiff's toes became discolored and purple.

234. Plaintiff sought medical attention.

235. Plaintiff was initially diagnosed with cellulitis and prescribed medication.

236. On or about March 3, 2026, plaintiff went sick because of her medical condition.

237. On or about March 15, 2026, while plaintiff was out sick, she received an unannounced absence-control home visit from Sergeant FRANKLYN ABREU.

238. Plaintiff was not on Chronic Sick at the time of the absence-control visit.

239. Plaintiff alleges that the absence-control visit was inconsistent with ordinary department practice because she was not on Chronic Sick.

240. Sergeant ABREU told plaintiff, in sum and substance, that plaintiff was not on his regular routine visit list.

241. Sergeant ABREU further told plaintiff, in sum and substance, that someone from plaintiff's command had contacted Absence Control regarding plaintiff.

242. Plaintiff understood that statement to mean that someone from Transit District 11 had specifically requested or caused the absence-control visit.

243. Plaintiff alleges, upon information and belief, that defendants WILSON, JONES, PABON, or other command personnel caused or encouraged the absence-control visit in an effort to find a basis to discipline plaintiff while she was out sick.

244. Plaintiff alleges that Sergeant ABREU'S statement placed him on notice that the visit may have been triggered by retaliatory command-level conduct rather than routine absence-control procedures.

245. Plaintiff further alleges that Sergeant ABREU, as a police supervisor, had an obligation to recognize and report potential retaliatory conduct in the workplace, including the use of absence-control mechanisms to target an employee who had engaged in protected activity.

246. Plaintiff alleges that Sergeant ABREU failed to report the suspected retaliatory conduct to the Office of Equity and Inclusion, the Internal Affairs Bureau, or any other appropriate NYPD authority.

247. Plaintiff alleges that the absence-control visit increased her fear that command personnel were continuing to target her after her protected activity.

248. After the initial medical treatment, plaintiff consulted with a podiatrist.

249. The podiatrist referred plaintiff to a vascular doctor.

250. On or about March 25, 2026, plaintiff was diagnosed with Raynaud's disease.

251. Plaintiff understands Raynaud's disease to be a condition that can be triggered or aggravated by cold exposure and stress.

252. Plaintiff further understands that Raynaud's disease can affect blood flow to the fingers and toes.

253. Plaintiff alleges that her Raynaud's diagnosis was directly relevant to her ability to work outdoor posts, cold-weather assignments, and other assignments exposing her to cold conditions.

254. Plaintiff alleges that her medical condition required reasonable consideration by the NYPD and the City.

255. Plaintiff further alleges that defendants treated her medical condition as another opportunity to pressure, threaten, and retaliate against her.

#### **Defendant Castaldi and the Medical-Division Encounter**

256. After plaintiff was diagnosed with Raynaud's disease, plaintiff returned to the NYPD Medical Division and met with defendant MARIA TERESA CASTALDI.

257. Defendant CASTALDI was acting in connection with plaintiff's medical-duty status and ability to return to work.

258. Plaintiff was not medically prepared to resume full unrestricted patrol functions.

259. Defendant CASTALDI nevertheless threatened to return plaintiff to regular patrol functions.

260. Plaintiff alleges that defendant CASTALDI did so without properly reviewing plaintiff's medical records.

261. Plaintiff explained to defendant CASTALDI that she was not medically prepared to resume regular patrol functions.

262. Plaintiff further explained that she had recently been diagnosed with Raynaud's disease.

263. Defendant CASTALDI reacted harshly.

264. Defendant CASTALDI stated, in sum and substance, that she was not going to tolerate this.

265. Defendant CASTALDI further stated, in sum and substance, that plaintiff could not be a police officer with that condition.

266. Defendant CASTALDI also stated, in sum and substance, “So, maybe I should survey you?”

267. Plaintiff understood defendant CASTALDI’S reference to “survey” as a threat to initiate or recommend a process that could lead to an Article II Medical Board review and possible separation from police service.

268. Plaintiff understood that such a process could cause the Police Commissioner’s Office to submit or pursue an Ordinary Disability Retirement Pension application.

269. Plaintiff understood that such action could materially affect plaintiff’s future employment, income, pension status, and family finances.

270. Plaintiff alleges that defendant CASTALDI’S statements were threatening, disability-based, and coercive.

271. Plaintiff further alleges that defendant CASTALDI used plaintiff’s medical condition as a basis to threaten plaintiff’s continued employment rather than properly considering medical documentation and reasonable accommodation.

272. After defendant CASTALDI calmed down, she suggested that plaintiff contact the Reasonable Accommodations Section of the Office of Equity and Inclusion.

273. Plaintiff alleges that defendant CASTALDI should have addressed reasonable accommodation before threatening plaintiff with full duty, survey, or separation consequences.

274. Plaintiff later reported defendant CASTALDI’S conduct.

275. Plaintiff also observed defendant CASTALDI mistreat other Hispanic police officers during Medical Division visits.

276. Plaintiff alleges that defendant CASTALDI'S conduct contributed to the disability discrimination, hostile work environment, and retaliation alleged in this action.

### **Reasonable Accommodation Request and Command Opposition**

277. On or about April 2, 2026, plaintiff submitted a reasonable accommodation request through the NYPD Office of Equity and Inclusion.

278. Plaintiff requested an inside assignment out of cold-weather conditions while she managed symptoms related to Raynaud's disease.

279. Principal Administrative Associate Julia Jones handled plaintiff's reasonable accommodation request.

280. PRAA Jones informed plaintiff that the command would have to be contacted regarding whether plaintiff could be accommodated.

281. Plaintiff told PRAA Jones that contacting the command would likely create an issue because plaintiff had an active IAB matter involving defendants JONES and HAIRSTON and because plaintiff believed defendant WILSON would not fairly or neutrally support a reasonable accommodation for her.

282. Plaintiff specifically placed PRAA Jones on notice that the command's response to the accommodation request could be influenced by plaintiff's prior and ongoing protected activity.

283. Plaintiff alleges that PRAA Jones therefore had notice of plaintiff's concern that defendants would use the reasonable accommodation process as another opportunity to retaliate against her.

284. According to PRAA Jones, the proposed reasonable accommodation initially allowed plaintiff to remain on day tours from 0705 hours to 1540 hours.

285. The proposed reasonable accommodation was to remain in effect until approximately May 21, 2026.

286. The proposed accommodation included inside assignments such as telephone switchboard operator, station house administrative assignments, arrest processing officer, or hospitalized prisoner coverage.

287. Plaintiff alleges that those assignments were available and operationally feasible within Transit District 11.

288. Plaintiff further alleges that, based on her years in the Administrative Office, she knew the command had sufficient capacity to accommodate her.

289. According to PRAA Jones, defendants WILSON and JONES objected to the proposed day-tour accommodation.

290. Defendants WILSON and JONES instead sought to place plaintiff on midnights.

291. Plaintiff objected to the proposed midnight assignment.

292. Plaintiff objected because the midnight assignment created medical concerns related to cold exposure and inconsistent heating conditions.

293. Plaintiff also objected because the midnight assignment created serious family and childcare hardship.

294. Plaintiff's spouse is also employed by the NYPD and works rotating or changing tours.

295. Plaintiff also had caretaking obligations and family responsibilities that made a sudden midnight assignment especially burdensome.

296. Plaintiff alleges that defendants WILSON and JONES knew the proposed midnight assignment would create hardship for plaintiff.

297. Plaintiff alleges that defendants WILSON and JONES sought to impose the midnight assignment anyway.

298. Plaintiff alleges that the midnight proposal was not a good-faith accommodation but a retaliatory and punitive response to her protected activity, complaints, and medical condition.

299. PRAA Jones directed plaintiff to submit an email explaining why she could not accept the midnight assignment.

300. On or about April 22, 2026, plaintiff submitted the requested email.

301. In that email, plaintiff made clear that she was not refusing a reasonable accommodation.

302. Plaintiff made clear that she objected only to the specific midnight assignment proposed by the command.

303. Plaintiff alleges that PRAA Jones, as part of the NYPD's reasonable accommodation process, was placed on notice that defendants WILSON and JONES'S objection to plaintiff's day-tour accommodation and proposed midnight assignment raised concerns of retaliation and discriminatory animus.

304. Plaintiff further alleges that instead of initiating or referring a retaliation complaint based on plaintiff's concerns and the command's objection, PRAA Jones treated the issue as an accommodation-placement dispute and directed plaintiff to submit further written explanation.

305. Plaintiff alleges that this failure to report or escalate the retaliatory nature of the command's response contributed to the NYPD's failure to protect plaintiff from discrimination, disability discrimination, hostile work environment, and retaliation.

306. On or about April 27, 2026, the Reasonable Accommodation Section approved plaintiff's accommodation.

307. The approved accommodation permitted plaintiff to work as a telephone switchboard operator on the second platoon until approximately May 21, 2026.

308. The approved accommodation also allowed plaintiff to request an additional reasonable accommodation if needed.

309. Plaintiff alleges that the accommodation was approved despite the objections of defendants WILSON and JONES.

310. Plaintiff further alleges that defendants WILSON and JONES'S opposition to the accommodation reflected disability discrimination, hostile work environment, and retaliation.

#### **April 17, 2026 Line-of-Duty Injury**

311. On or about April 17, 2026, plaintiff responded to an assignment involving a person in need of medical attention.

312. The aided person was combative.

313. The aided person resisted being handcuffed and controlled.

314. Several officers were required to contain and control the aided person.

315. Plaintiff was injured during the incident.

316. Plaintiff used her line-of-duty medical benefits to obtain medical evaluation and treatment.

317. Plaintiff was contractually and legally permitted to use line-of-duty medical benefits after being injured during the performance of duty.

318. Plaintiff remained out of work for a period of time after the line-of-duty injury.

319. Plaintiff returned to work on or about May 2, 2026.

320. Plaintiff returned to work with authorization from the Medical Division.

321. Plaintiff alleges that defendants WILSON and PABON later used body-worn-camera footage from this line-of-duty incident to search for a disciplinary basis against her.

322. Plaintiff further alleges that the review of the footage was not a neutral review of a line-of-duty injury, but part of a retaliatory effort to discipline plaintiff after protected activity and after approval of her reasonable accommodation.

#### **Defendant Pabon's "Snake" Comment and Retaliatory Animus**

323. Defendant DAVID PABON was assigned to Transit District 11 and served as the Integrity Control Officer.

324. As Integrity Control Officer, defendant PABON had responsibilities relating to integrity, discipline, compliance, and command accountability.

325. Plaintiff alleges that defendant PABON was aware of plaintiff's prior federal lawsuit involving sexual harassment within Transit District 11.

326. Plaintiff further alleges that defendant PABON was aware of plaintiff's informal and formal complaints concerning discrimination, sexual harassment, hostile work environment, and retaliation.

327. On or about April 18, 2026, plaintiff was near the Radio Room.

328. While near the Radio Room, plaintiff overheard defendant PABON speaking with an unidentified male supervisor.

329. Defendant PABON stated, in sum and substance, that plaintiff should not be picked as a driver.

330. Defendant PABON further stated, in sum and substance, that plaintiff should not be trusted because she was a “snake.”

331. Plaintiff understood defendant PABON’S “snake” comment to refer to her prior and ongoing protected activity.

332. Plaintiff understood defendant PABON’S comment to mean that she was viewed negatively because she complained about discrimination, sexual harassment, hostile work environment, retaliation, and workplace misconduct.

333. Plaintiff alleges that defendant PABON’S statement reflected retaliatory animus.

334. Plaintiff further alleges, upon information and belief, that defendant PABON spread his retaliatory view of plaintiff to other members of the Transit District 11 management team and staff.

335. Plaintiff alleges, upon information and belief, that defendant PABON communicated that view to, or shared that view with, defendants WILSON, JONES, and HAIRSTON.

336. Plaintiff alleges that defendant PABON’S “snake” comment is evidence that command personnel viewed plaintiff’s protected activity as disloyalty rather than protected opposition to unlawful workplace conduct.

337. Plaintiff further alleges that defendant PABON’S retaliatory animus later manifested in the Command Discipline issued against plaintiff on May 4, 2026.

**May 2–May 4, 2026 Command Discipline**

338. On or about May 2, 2026, shortly after plaintiff returned to work, Sergeant Glen Reyes spoke with plaintiff.

339. Sergeant Reyes told plaintiff that he had overheard defendants WILSON and PABON discussing plaintiff.

340. Sergeant Reyes told plaintiff, in sum and substance, that defendant WILSON intended to issue plaintiff a Command Discipline.

341. Sergeant Reyes further told plaintiff that defendant WILSON stated, in sum and substance, "I'm going to give PO Castillo a CD. Watch me."

342. Sergeant Reyes told plaintiff that defendant WILSON intended to review plaintiff's body-worn-camera footage from the April 17, 2026 line-of-duty incident.

343. Plaintiff understood the intended review as a search for a violation of department policy.

344. Sergeant Reyes told plaintiff that he reviewed the relevant footage and did not see any violation by plaintiff.

345. Plaintiff alleges that Sergeant Reyes understood, or should have understood, that defendants WILSON and PABON'S alleged discussion reflected retaliatory intent and a plan to search for a disciplinary basis against plaintiff after her protected activity, reasonable accommodation request, and use of line-of-duty medical benefits.

346. Plaintiff further alleges that Sergeant Reyes, as a police supervisor, failed to report defendants WILSON and PABON'S suspected retaliatory conduct to the Office of Equity and Inclusion, the Internal Affairs Bureau, or any other appropriate NYPD authority.

347. Instead, Sergeant Reyes disclosed the information to plaintiff, leaving plaintiff to protect herself from the anticipated retaliatory discipline.

348. Plaintiff alleges that Sergeant Reyes's failure to report the retaliatory conduct further demonstrates the NYPD's failure to correct known discriminatory and retaliatory conduct within Transit District 11.

349. On or about May 4, 2026, at approximately 0930 hours, defendant PABON directed plaintiff to speak with him.

350. Plaintiff's PBA delegate, Police Officer Abraham Walters, was present.

351. Defendant PABON served plaintiff with a Command Discipline.

352. The Command Discipline was based on defendants WILSON and PABON'S review of body-worn-camera footage from the April 17, 2026 line-of-duty incident.

353. Plaintiff was accused of carrying a small white bag on her gun belt.

354. The small white bag contained plaintiff's prescription medication related to her medical condition.

355. Shortly after defendant PABON served the Command Discipline, plaintiff was ordered into defendant WILSON'S office.

356. Defendant WILSON, defendant PABON, and PBA Delegate Walters were present.

357. Defendant WILSON attempted to justify the Command Discipline as a uniform violation.

358. Plaintiff explained that the white bag contained medication.

359. Plaintiff further explained that the medication was related to her medical condition.

360. Defendants WILSON and PABON imposed a penalty of one hour of lost time.

361. This was the first Command Discipline of plaintiff's NYPD career.

362. Plaintiff was upset and distressed by the discipline.

363. Plaintiff alleges that defendants WILSON and PABON were not genuinely concerned with a uniform violation.

364. Plaintiff alleges that defendants WILSON and PABON used the body-worn-camera footage from her line-of-duty injury to search for a basis to discipline her.

365. Plaintiff alleges that the Command Discipline was pretextual.

366. Plaintiff further alleges that the Command Discipline was retaliatory and issued because of her prior and ongoing protected activity, complaints of discrimination, complaints of sexual harassment, hostile work environment complaints, disability-related accommodation request, and opposition to retaliatory conduct.

#### **May 4 and May 11, 2026 Protected Activity**

367. On or about May 4, 2026, after receiving the Command Discipline from defendants WILSON and PABON, plaintiff contacted the Internal Affairs Bureau again.

368. Plaintiff contacted IAB to report retaliation.

369. Plaintiff spoke with Police Officer Christopher Mera.

370. IAB opened Log No. 2026-15572 regarding plaintiff's retaliation complaint.

371. Also, on or about May 4, 2026, plaintiff contacted the Office of Equity and Inclusion.

372. Plaintiff spoke with Sergeant Tricia E. Connolly.

373. Plaintiff reported further retaliation after her prior EEO/IAB complaints, medical accommodation request, and the command's attempt to place her on midnights.

374. On or about May 4, 2026, plaintiff also received information from Sergeant Evelyn Hall of the Internal Affairs Bureau regarding plaintiff's earlier IAB matter.

375. Sergeant Hall advised plaintiff that IAB Log No. 2025-40352 had been closed as unsubstantiated as of April 8, 2026.

376. Plaintiff had not been meaningfully informed before that date that the matter had been closed.

377. Plaintiff alleges that she did not receive meaningful follow-up before IAB closed the matter.

378. Plaintiff further alleges that the closing of IAB Log No. 2025-40352 without meaningful follow-up reflected the NYPD's failure to adequately address her complaints.

379. On or about May 5, 2026, plaintiff contacted Detective Stephanie Perez from the Office of Equity and Inclusion.

380. Plaintiff contacted Detective Perez because Detective Perez had previously called plaintiff about defendant HAIRSTON and his sexual comments.

381. During that telephone call, plaintiff discussed interference with her reasonable accommodation request.

382. Plaintiff also discussed allegations involving defendants WILSON, JONES, and HAIRSTON.

383. Plaintiff later went in person to speak with Detective Perez on or about May 11, 2026.

384. During the May 11, 2026 meeting, plaintiff discussed defendant HAIRSTON'S sexual comments.

385. Plaintiff also discussed retaliation, the reasonable accommodation process, and the conduct of defendants WILSON, JONES, and HAIRSTON.

386. Plaintiff was under stress during these communications.

387. Plaintiff did not have faith in the NYPD's internal handling of discrimination, sexual harassment, hostile work environment, disability discrimination, or retaliation complaints.

388. Plaintiff alleges that her May 4, 2026 and May 11, 2026 complaints constituted additional protected activity.

389. Plaintiff further alleges that defendants THE CITY OF NEW YORK and NYPD management personnel had notice of the ongoing discriminatory, sexually offensive, hostile, disability-based, and retaliatory conduct alleged in this action.

### **CONCLUSION**

390. Defendants THE CITY OF NEW YORK, ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI, acting individually and/or through the NYPD, subjected plaintiff to unlawful employment discrimination, race and national origin discrimination, sexual harassment, disability discrimination, hostile work environment, and retaliation after she engaged in protected activity.

391. Plaintiff alleges that defendant THE CITY OF NEW YORK had repeated notice of the unlawful workplace conditions and failed to take prompt, effective, and reasonable corrective action.

392. Plaintiff further alleges that defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI participated in, aided, abetted, encouraged, permitted, or failed to prevent the unlawful conduct described herein.

393. As a result, plaintiff suffered damages, including emotional distress, humiliation, loss of workplace security, interference with her employment conditions, and other compensable harm.

394. Plaintiff therefore seeks all relief available under the New York State Human Rights Law and the New York City Human Rights Law, including compensatory damages, punitive damages where permitted, attorneys' fees, costs, interest, equitable relief, and such other and further relief as this Court deems just and proper.

### **VIOLATIONS AND CLAIMS ALLEGED**

#### **FIRST CAUSE OF ACTION**

#### **New York State Human Rights Law – Race and National Origin Discrimination Against All Defendants**

395. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

396. Plaintiff DONNA Y. CASTILLO-DIAZ is a Dominican woman and is protected from race and national origin discrimination under the New York State Human Rights Law.

397. At all relevant times, plaintiff was qualified for her position as a New York City police officer and performed her duties satisfactorily.

398. Plaintiff alleges that her race and national origin were motivating factors in the discriminatory treatment she experienced within Transit District 11.

399. Defendant THE CITY OF NEW YORK, through the NYPD, discriminated against plaintiff by permitting, condoning, and failing to correct discriminatory workplace conduct affecting plaintiff's terms, conditions, and privileges of employment.

400. Defendant ROMAINE L. WILSON discriminated against plaintiff by removing her from her long-held administrative assignment, rejecting efforts to keep her in that assignment, subjecting her to heightened scrutiny, opposing her reasonable accommodation, and participating in discipline against her under circumstances plaintiff alleges were motivated, at least in part, by her race and national origin.

401. Defendant DARNELL S. JONES discriminated against plaintiff by targeting her through overtime scrutiny, undesirable detail assignments, hostile workplace treatment, assignment pressure, and opposition to her reasonable accommodation under circumstances plaintiff alleges were motivated, at least in part, by her race and national origin.

402. Defendant DAVID PABON discriminated against plaintiff by stigmatizing her as a “snake,” participating in discipline against her, and assisting in the use of command authority to punish and isolate her under circumstances plaintiff alleges were motivated, at least in part, by her race and national origin.

403. Defendant JAMAL HAIRSTON discriminated against plaintiff by contributing to a discriminatory and hostile workplace environment through unwanted sexualized comments and conduct directed toward plaintiff and other female officers, including Hispanic female officers, under circumstances plaintiff alleges were motivated, at least in part, by plaintiff’s race and national origin.

404. Defendant MARIA TERESA CASTALDI discriminated against plaintiff by subjecting her to hostile and adverse treatment after plaintiff disclosed her medical condition, under circumstances plaintiff alleges were motivated, at least in part, by plaintiff’s race and national origin.

405. Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted discriminatory conduct by participating in, encouraging, permitting, condoning, or failing to prevent the discriminatory treatment described herein.

406. As a direct and proximate result of defendants’ race and national origin discrimination, plaintiff suffered damages.

407. Defendants' conduct violated the New York State Human Rights Law.

**SECOND CAUSE OF ACTION  
New York State Human Rights Law – Sexual Harassment  
Against All Defendants**

408. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

409. Plaintiff DONNA Y. CASTILLO-DIAZ is a woman and is protected from sexual harassment under the New York State Human Rights Law.

410. Defendants subjected plaintiff to unwanted sexualized conduct, comments, intimidation, monitoring, and workplace treatment that altered the terms, conditions, and privileges of her employment.

411. Defendant THE CITY OF NEW YORK, through the NYPD, permitted, condoned, and failed to correct sexual harassment and sexually offensive conduct within Transit District 11 after receiving notice of plaintiff's prior and continuing complaints.

412. Defendant ROMAINE L. WILSON subjected plaintiff to sexually offensive and intrusive conduct, including repeated comments that plaintiff perceived as flirtatious, personal, and connected to the same workplace monitoring dynamic she previously experienced after reporting sexual harassment.

413. Defendant JAMAL HAIRSTON subjected plaintiff to unwanted sexualized comments and conduct, including comments referring to plaintiff as "the light of my eyes," "my goddess walking my way," and suggesting that plaintiff should sit beside him and work for him in the Administrative Office.

414. Defendant DARNELL S. JONES aided and abetted the sexual harassment by participating in the command structure that allowed the sexually hostile environment to continue,

by aligning himself with defendants WILSON and HAIRSTON, and by targeting plaintiff after she objected to and reported sexually offensive workplace conduct.

415. Defendant DAVID PABON aided and abetted the sexual harassment by participating in retaliatory command conduct against plaintiff after she opposed and reported sexually offensive workplace conduct.

416. Defendant MARIA TERESA CASTALDI aided and abetted the unlawful workplace environment by subjecting plaintiff to hostile and adverse treatment after plaintiff had already engaged in protected activity and sought protection from discriminatory workplace conditions.

417. Plaintiff did not invite, welcome, or consent to the sexually offensive conduct described herein.

418. The sexual harassment described herein occurred because of plaintiff's sex and was sufficiently harmful to subject plaintiff to inferior terms, conditions, and privileges of employment.

419. Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted the sexual harassment by participating in, encouraging, permitting, condoning, or failing to prevent the unlawful conduct described herein.

420. As a direct and proximate result of defendants' sexual harassment, plaintiff suffered damages.

421. Defendants' conduct violated the New York State Human Rights Law.

**THIRD CAUSE OF ACTION  
New York State Human Rights Law – Disability Discrimination  
Against All Defendants**

422. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

423. Plaintiff DONNA Y. CASTILLO-DIAZ has been diagnosed with Raynaud's disease and is protected from disability discrimination under the New York State Human Rights Law.

424. At all relevant times, plaintiff was qualified to perform the essential functions of her position with a reasonable accommodation.

425. Plaintiff alleges that her disability, perceived disability, medical restrictions, and request for reasonable accommodation were motivating factors in the adverse and discriminatory treatment she experienced.

426. Defendant THE CITY OF NEW YORK, through the NYPD, discriminated against plaintiff by permitting, condoning, and failing to correct disability-based mistreatment, accommodation-related hostility, and retaliatory workplace conduct.

427. Defendant ROMAINE L. WILSON discriminated against plaintiff by opposing plaintiff's proposed day-tour reasonable accommodation, attempting to place her on midnights despite her medical condition and family obligations, and participating in discipline against her after her reasonable accommodation was approved.

428. Defendant DARNELL S. JONES discriminated against plaintiff by opposing plaintiff's proposed day-tour reasonable accommodation, supporting or participating in the proposed midnight assignment, and using administrative authority in a manner that worsened plaintiff's working conditions after she requested accommodation.

429. Defendant DAVID PABON discriminated against plaintiff by participating in discipline against plaintiff based on a small white bag containing medication related to her

medical condition, after defendants reviewed body-worn-camera footage from plaintiff's line-of-duty injury.

430. Defendant JAMAL HAIRSTON aided and abetted the discriminatory workplace conditions by contributing to the hostile command environment in which plaintiff's medical condition and request for accommodation were treated as additional grounds for scrutiny, isolation, and retaliation.

431. Defendant MARIA TERESA CASTALDI discriminated against plaintiff by threatening to return plaintiff to full-duty patrol functions without proper review of her medical records, stating in substance that plaintiff could not be a police officer with her condition, and threatening to survey plaintiff because of her medical condition.

432. Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted disability discrimination by participating in, encouraging, permitting, condoning, or failing to prevent the discriminatory conduct described herein.

433. As a direct and proximate result of defendants' disability discrimination, plaintiff suffered damages.

434. Defendants' conduct violated the New York State Human Rights Law.

**FOURTH CAUSE OF ACTION**  
**New York State Human Rights Law – Hostile Work Environment**  
**Against All Defendants**

435. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

436. Plaintiff is a Dominican woman who engaged in protected activity, opposed sexual harassment, and later sought medical protection and a reasonable accommodation for Raynaud's disease.

437. Defendants subjected plaintiff to a hostile work environment because of her race, national origin, sex, disability, and protected activity.

438. Defendant THE CITY OF NEW YORK, through the NYPD, permitted, condoned, and failed to correct the hostile work environment after receiving repeated notice of discriminatory, sexually offensive, disability-based, and retaliatory conduct in Transit District 11.

439. Defendant ROMAINÉ L. WILSON contributed to the hostile work environment by removing plaintiff from administration, subjecting her to intrusive and sexually offensive conduct, opposing her reasonable accommodation, and participating in discipline against her.

440. Defendant DARNELL S. JONES contributed to the hostile work environment by targeting plaintiff through overtime scrutiny, undesirable detail assignments, hostile treatment, assignment pressure, and opposition to her reasonable accommodation.

441. Defendant DAVID PABON contributed to the hostile work environment by referring to plaintiff as a “snake,” spreading retaliatory hostility toward her, and participating in discipline against her after she engaged in protected activity.

442. Defendant JAMAL HAIRSTON contributed to the hostile work environment by directing unwanted sexualized comments and conduct toward plaintiff and other female officers.

443. Defendant MARIA TERESA CASTALDI contributed to the hostile work environment by subjecting plaintiff to disability-based hostility, threatening her continued police employment, and treating her medical condition as a basis for adverse employment action.

444. The hostile work environment altered the terms, conditions, and privileges of plaintiff’s employment and subjected her to inferior working conditions.

445. Defendants ROMAINE L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted the hostile work environment by participating in, encouraging, permitting, condoning, or failing to prevent the unlawful conduct described herein.

446. As a direct and proximate result of defendants' hostile work environment, plaintiff suffered damages.

447. Defendants' conduct violated the New York State Human Rights Law.

**FIFTH CAUSE OF ACTION  
New York State Human Rights Law – Retaliation  
Against All Defendants**

448. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

449. Plaintiff engaged in protected activity by opposing discrimination, sexual harassment, hostile work environment, disability discrimination, and retaliation within Transit District 11.

450. Plaintiff's protected activity included, but was not limited to, filing an EEOC Charge of Discrimination, commencing a prior federal lawsuit, complaining to the NYPD Office of Equity and Inclusion, reporting conduct to the Internal Affairs Bureau, opposing sexually offensive workplace conduct, requesting a reasonable accommodation, and objecting to retaliatory treatment.

451. Defendants knew or should have known that plaintiff engaged in protected activity.

452. Defendant THE CITY OF NEW YORK, through the NYPD, retaliated against plaintiff by failing to protect her after repeated notice of discrimination, sexual harassment, hostile work environment, disability discrimination, and retaliation.

453. Defendant ROMAINÉ L. WILSON retaliated against plaintiff by removing her from her long-held administrative assignment, subjecting her to heightened scrutiny, opposing her reasonable accommodation, and participating in discipline against her.

454. Defendant DARNELL S. JONES retaliated against plaintiff by targeting her through overtime scrutiny, undesirable detail assignments, hostile treatment, assignment pressure, and opposition to her reasonable accommodation.

455. Defendant DAVID PABON retaliated against plaintiff by referring to her as a “snake,” participating in discipline against her, and assisting in the use of command authority to punish plaintiff after she engaged in protected activity.

456. Defendant JAMAL HAIRSTON retaliated against plaintiff by contributing to the hostile and retaliatory workplace environment after plaintiff opposed sexually offensive conduct and reported workplace discrimination.

457. Defendant MARIA TERESA CASTALDI retaliated against plaintiff by subjecting her to adverse and hostile treatment after plaintiff disclosed her medical condition and sought workplace protection and accommodation.

458. Defendants’ retaliatory conduct was reasonably likely to deter plaintiff and other employees from opposing discrimination, reporting sexual harassment, requesting reasonable accommodations, or participating in OEI, IAB, or civil-rights proceedings.

459. Defendants ROMAINÉ L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted retaliation by participating in, encouraging, permitting, condoning, or failing to prevent the retaliatory conduct described herein.

460. As a direct and proximate result of defendants' retaliation, plaintiff suffered damages.

461. Defendants' conduct violated the New York State Human Rights Law.

**SIXTH CAUSE OF ACTION  
New York City Human Rights Law – Race and National Origin Discrimination  
Against All Defendants**

462. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

463. Plaintiff DONNA Y. CASTILLO-DIAZ is a Dominican woman and is protected from race and national origin discrimination under the New York City Human Rights Law.

464. At all relevant times, plaintiff was qualified for her position as a New York City police officer and performed her duties satisfactorily.

465. Plaintiff alleges that her race and national origin were motivating factors in the discriminatory treatment she experienced within Transit District 11.

466. Defendant THE CITY OF NEW YORK, through the NYPD, discriminated against plaintiff by permitting, condoning, and failing to correct discriminatory workplace conduct affecting plaintiff's terms, conditions, and privileges of employment.

467. Defendant ROMAINE L. WILSON discriminated against plaintiff by removing her from her long-held administrative assignment, rejecting efforts to keep her in that assignment, subjecting her to heightened scrutiny, opposing her reasonable accommodation, and participating in discipline against her under circumstances plaintiff alleges were motivated, at least in part, by her race and national origin.

468. Defendant DARNELL S. JONES discriminated against plaintiff by targeting her through overtime scrutiny, undesirable detail assignments, hostile workplace treatment,

assignment pressure, and opposition to her reasonable accommodation under circumstances plaintiff alleges were motivated, at least in part, by her race and national origin.

469. Defendant DAVID PABON discriminated against plaintiff by stigmatizing her as a “snake,” participating in discipline against her, and assisting in the use of command authority to punish and isolate her under circumstances plaintiff alleges were motivated, at least in part, by her race and national origin.

470. Defendant JAMAL HAIRSTON discriminated against plaintiff by contributing to a discriminatory and hostile workplace environment through unwanted sexualized comments and conduct directed toward plaintiff and other female officers, including Hispanic female officers, under circumstances plaintiff alleges were motivated, at least in part, by plaintiff’s race and national origin.

471. Defendant MARIA TERESA CASTALDI discriminated against plaintiff by subjecting her to hostile and adverse treatment after plaintiff disclosed her medical condition, under circumstances plaintiff alleges were motivated, at least in part, by plaintiff’s race and national origin.

472. Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted discriminatory conduct by participating in, encouraging, permitting, condoning, or failing to prevent the discriminatory treatment described herein.

473. Defendants treated plaintiff less well than other employees because of her race and national origin.

474. As a direct and proximate result of defendants’ race and national origin discrimination, plaintiff suffered damages.

475. Defendants' conduct violated the New York City Human Rights Law.

**SEVENTH CAUSE OF ACTION  
New York City Human Rights Law – Sexual Harassment  
Against All Defendants**

476. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

477. Plaintiff DONNA Y. CASTILLO-DIAZ is a woman and is protected from sexual harassment under the New York City Human Rights Law.

478. Defendants subjected plaintiff to unwanted sexually offensive conduct, comments, intimidation, monitoring, and workplace treatment that caused plaintiff to be treated less well because of her sex.

479. Defendant THE CITY OF NEW YORK, through the NYPD, permitted, condoned, and failed to correct sexual harassment and sexually offensive conduct within Transit District 11 after receiving notice of plaintiff's prior and continuing complaints.

480. Defendant ROMAINE L. WILSON treated plaintiff less well by subjecting her to intrusive and sexually offensive conduct, including repeated comments, conduct, and monitoring that plaintiff perceived as personal, sexualized, and connected to the same workplace dynamic she previously experienced after reporting sexual harassment.

481. Defendant JAMAL HAIRSTON treated plaintiff less well by subjecting her to unwanted sexualized comments and conduct, including comments referring to plaintiff as "the light of my eyes," "my goddess walking my way," and suggesting that plaintiff should sit beside him and work for him in the Administrative Office.

482. Defendant DARNELL S. JONES aided and abetted sexual harassment by participating in the command structure that allowed the sexually offensive workplace

environment to continue and by targeting plaintiff after she opposed and reported sexually offensive workplace conduct.

483. Defendant DAVID PABON aided and abetted sexual harassment by participating in retaliatory command conduct against plaintiff after she opposed and reported sexually offensive workplace conduct.

484. Defendant MARIA TERESA CASTALDI aided and abetted the unlawful workplace environment by subjecting plaintiff to hostile and adverse treatment after plaintiff had already engaged in protected activity and sought protection from discriminatory workplace conditions.

485. Plaintiff did not invite, welcome, encourage, or consent to the sexually offensive conduct described herein.

486. Defendants' conduct was based, at least in part, on plaintiff's sex and caused plaintiff to be treated less well than other employees.

487. Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted sexual harassment by participating in, encouraging, permitting, condoning, or failing to prevent the unlawful conduct described herein.

488. As a direct and proximate result of defendants' sexual harassment, plaintiff suffered damages.

489. Defendants' conduct violated the New York City Human Rights Law.

**EIGHTH CAUSE OF ACTION  
New York City Human Rights Law – Disability Discrimination  
Against All Defendants**

490. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

491. Plaintiff DONNA Y. CASTILLO-DIAZ has been diagnosed with Raynaud's disease and is protected from disability discrimination under the New York City Human Rights Law.

492. At all relevant times, plaintiff was qualified to perform the essential functions of her position with a reasonable accommodation.

493. Plaintiff alleges that her disability, perceived disability, medical restrictions, and request for reasonable accommodation were motivating factors in defendants' conduct and caused plaintiff to be treated less well than other employees.

494. Defendant THE CITY OF NEW YORK, through the NYPD, discriminated against plaintiff by permitting, condoning, and failing to correct disability-based mistreatment, accommodation-related hostility, and retaliatory workplace conduct after plaintiff disclosed her medical condition and requested accommodation.

495. Defendant ROMAINE L. WILSON treated plaintiff less well by opposing plaintiff's proposed day-tour reasonable accommodation, attempting to place plaintiff on midnights despite her medical condition and known hardship, and participating in discipline against plaintiff shortly after her reasonable accommodation was approved.

496. Defendant DARNELL S. JONES treated plaintiff less well by opposing plaintiff's proposed day-tour reasonable accommodation, supporting or participating in the proposed midnight assignment, and using administrative authority in a manner that worsened plaintiff's working conditions after plaintiff requested accommodation.

497. Defendant DAVID PABON treated plaintiff less well by participating in discipline against plaintiff based on a small white bag containing medication related to plaintiff's

medical condition, after defendants reviewed body-worn-camera footage from plaintiff's line-of-duty injury.

498. Defendant JAMAL HAIRSTON aided and abetted disability discrimination by contributing to the hostile and retaliatory command environment in which plaintiff's medical condition and request for accommodation were treated as additional grounds for scrutiny, isolation, and adverse treatment.

499. Defendant MARIA TERESA CASTALDI treated plaintiff less well by threatening to return plaintiff to full-duty patrol functions without proper review of her medical records, stating in substance that plaintiff could not be a police officer with her condition, and threatening to survey plaintiff because of her medical condition.

500. Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted disability discrimination by participating in, encouraging, permitting, condoning, or failing to prevent the discriminatory conduct described herein.

501. As a direct and proximate result of defendants' disability discrimination, plaintiff suffered damages.

502. Defendants' conduct violated the New York City Human Rights Law.

**NINTH CAUSE OF ACTION  
New York City Human Rights Law – Hostile Work Environment  
Against All Defendants**

503. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

504. Plaintiff is a Dominican woman who opposed sexual harassment, complained about discrimination and retaliation, and later disclosed a medical condition requiring reasonable accommodation.

505. Defendants subjected plaintiff to a hostile work environment because of her race, national origin, sex, disability, and protected activity.

506. Defendant THE CITY OF NEW YORK, through the NYPD, permitted, condoned, and failed to correct the hostile work environment after receiving repeated notice of discriminatory, sexually offensive, disability-based, and retaliatory conduct in Transit District 11.

507. Defendant ROMAINÉ L. WILSON contributed to the hostile work environment by removing plaintiff from administration, subjecting plaintiff to intrusive and sexually offensive conduct, opposing plaintiff's reasonable accommodation, and participating in discipline against plaintiff.

508. Defendant DARNELL S. JONES contributed to the hostile work environment by targeting plaintiff through overtime scrutiny, undesirable detail assignments, hostile treatment, assignment pressure, and opposition to plaintiff's reasonable accommodation.

509. Defendant DAVID PABON contributed to the hostile work environment by referring to plaintiff as a "snake," spreading retaliatory hostility toward plaintiff, and participating in discipline against plaintiff after she engaged in protected activity.

510. Defendant JAMAL HAIRSTON contributed to the hostile work environment by directing unwanted sexualized comments and conduct toward plaintiff and other female officers.

511. Defendant MARIA TERESA CASTALDI contributed to the hostile work environment by subjecting plaintiff to disability-based hostility, threatening plaintiff's continued police employment, and treating plaintiff's medical condition as a basis for adverse employment consequences.

512. Defendants' conduct caused plaintiff to be treated less well than other employees and subjected plaintiff to inferior terms, conditions, and privileges of employment.

513. Defendants ROMAIN L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted the hostile work environment by participating in, encouraging, permitting, condoning, or failing to prevent the unlawful conduct described herein.

514. As a direct and proximate result of defendants' hostile work environment, plaintiff suffered damages.

515. Defendants' conduct violated the New York City Human Rights Law.

**TENTH CAUSE OF ACTION  
New York City Human Rights Law – Retaliation  
Against All Defendants**

516. Plaintiff repeats and realleges the foregoing paragraphs as if fully set forth herein.

517. Plaintiff engaged in protected activity by opposing discrimination, sexual harassment, hostile work environment, disability discrimination, and retaliation within Transit District 11.

518. Plaintiff's protected activity included filing an EEOC Charge of Discrimination, commencing a prior federal lawsuit, complaining to the NYPD Office of Equity and Inclusion, reporting conduct to the Internal Affairs Bureau, opposing sexually offensive workplace conduct, requesting a reasonable accommodation, objecting to the proposed midnight assignment, and reporting retaliatory discipline.

519. Defendants knew or should have known that plaintiff engaged in protected activity.

520. Defendant THE CITY OF NEW YORK, through the NYPD, retaliated against plaintiff by permitting, condoning, and failing to correct retaliatory conduct after repeated notice of plaintiff's protected activity and the adverse treatment that followed.

521. Defendant ROMAIN L. WILSON retaliated against plaintiff by removing her from her long-held administrative assignment, subjecting her to heightened scrutiny, opposing her reasonable accommodation, attempting to place her on midnights, and participating in discipline against her after she engaged in protected activity.

522. Defendant DARNELL S. JONES retaliated against plaintiff by targeting her through overtime scrutiny, undesirable detail assignments, hostile treatment, assignment pressure, and opposition to her reasonable accommodation after she engaged in protected activity.

523. Defendant DAVID PABON retaliated against plaintiff by referring to her as a "snake," participating in discipline against her, and assisting in the use of command authority and body-worn-camera review to punish plaintiff after she engaged in protected activity.

524. Defendant JAMAL HAIRSTON retaliated against plaintiff by contributing to the hostile and retaliatory workplace environment after plaintiff opposed sexually offensive conduct and reported discrimination, sexual harassment, hostile work environment, and retaliation.

525. Defendant MARIA TERESA CASTALDI retaliated against plaintiff by subjecting her to hostile and adverse treatment after plaintiff disclosed her medical condition, sought workplace protection, and requested reasonable accommodation.

526. Defendants' conduct was reasonably likely to deter plaintiff and other employees from opposing discrimination, reporting sexual harassment, requesting reasonable

accommodations, participating in EEO, OEI, IAB, or civil-rights proceedings, or otherwise asserting rights protected by the New York City Human Rights Law.

527. Defendants ROMAINÉ L. WILSON, DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON, and MARIA TERESA CASTALDI aided and abetted retaliation by participating in, encouraging, permitting, condoning, or failing to prevent the retaliatory conduct described herein.

528. As a direct and proximate result of defendants' retaliation, plaintiff suffered damages.

529. Defendants' conduct violated the New York City Human Rights Law.

**JURY TRIAL**

530. Plaintiff DONNA Y. CASTILLO-DIAZ hereby demands a trial by jury of all issues so triable as of right.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff DONNA Y. CASTILLO-DIAZ respectfully requests that judgment be entered in her favor and against Defendants, awarding the following relief:

- a. A declaration that Defendants' acts, policies, and practices complained of herein violated the New York State Human Rights Law and the New York City Human Rights Law;
- b. An award of compensatory damages for lost wages, lost benefits, and other economic losses in an amount to be determined at trial;
- c. An award of compensatory damages for emotional distress, mental anguish, humiliation, and loss of enjoyment of life in an amount to be determined at trial;
- d. An award of punitive damages to the extent permitted by law;

- e. An award of reasonable attorneys' fees, costs, and disbursements as provided by law;
- f. Pre-judgment and post-judgment interest as permitted by law;
- g. Such other and further legal and equitable relief as the Court deems just and proper.

Dated: May 25, 2026  
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders  
Attorney for Plaintiff DONNA Y. CASTILLO-DIAZ

**THE SANDERS FIRM, P.C.**  
30 Wall Street, 8<sup>th</sup> Floor  
New York, NY 10005  
(212) 652-2782 (Business Telephone)  
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Website: <http://www.thesandersfirmpc.com>

**ATTORNEY VERIFICATION**

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

I am an attorney admitted to practice in the State of New York courts. As the attorney for the plaintiff in the action, I am familiar with all the facts and circumstances.

The Verified Complaint is true to the knowledge of the affirmant, except for those matters stated to be alleged upon information and belief, and he believes those matters to be factual.

The affirmant further states that this verification is made by the affirmant and not by the Plaintiff because the Plaintiff is not within the county of Westchester, where the affirmant maintains his office.

The undersigned attorney affirms that the previous statements are true under the penalties of perjury and Rule 2106 CPLR.

Dated: May 25, 2026  
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders  
Attorney for Plaintiff DONNA Y. CASTILLO-DIAZ

**THE SANDERS FIRM, P.C.**  
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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

INDEX NO.:

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DONNA Y. CASTILLO-DIAZ

Plaintiff,

-against-

THE CITY OF NEW YORK, ROMAIN L. WILSON,  
DARNELL S. JONES, DAVID PABON, JAMAL HAIRSTON,  
and MARIA TERESA CASTALDI

Defendants

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**SUMMONS WITH VERIFIED COMPLAINT**

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*Duly submitted by:*

Eric Sanders, Esq.  
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