

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

Angielina Melendez,

Plaintiff,

v.

Arrow Security, and Does 1–10, inclusive,

Defendants.

No.:

FIRST AMENDED COMPLAINT

JURY TRIAL DEMANDED

**COMPLAINT
AND DEMAND FOR JURY TRIAL**

Plaintiff Angielina Melendez (“Plaintiff” or “Ms. Melendez”), by and through her attorneys, Starpoint LC, as and for her Complaint in this action against Arrow Security, and Does 1–10 (“Does”) (collectively, “Defendants”), alleges upon personal knowledge and upon information and belief as to other matters as follows:

NATURE OF THE CLAIMS

1. Plaintiff provided faithful – and profitable – service to Defendants. Despite such service, Defendants subjected Plaintiff to egregious sex discrimination through the establishment of a quid pro quo sexual harassment relationship between Plaintiff’s Manager and Plaintiff. Plaintiff’s eventually express opposition to the quid pro quo sexual harassment was met with retaliation and termination by Defendant.

2. Defendants discriminatory and otherwise unlawful conduct was knowing, malicious, willful and wanton, and/or showed a reckless disregard for Plaintiff, which has caused and continues to cause her to suffer substantial economic and noneconomic damages and severe mental anguish and emotional distress.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 as this case is brought under the Title VII of the Civil Rights Act of 1964. The Court has supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. § 1367.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, because the unlawful conduct that gave rise to these claims primarily occurred in this District.

The Parties

5. Plaintiff was employed by Defendants as a Security Officer assigned to the HHC Randalls Island (HERRC) location.

6. Plaintiff worked under the supervision of an individual identified as "Norman," who exercised authority over Plaintiff's work assignments, scheduling, and other terms and conditions of employment.

7. During Plaintiff's employment, Defendants' management personnel included, among others, Lola Ramaseur, Joseph Kincaid, Nicholas Genduso, and Sania Outlaw.

Supervisor's Sexual Relationship With Plaintiff

8. Beginning no later than January 2025, Norman initiated and engaged in a personal and sexual relationship with Plaintiff while acting as her supervisor.

9. On or about January 1, 2025, Norman sent Plaintiff sexually suggestive messages, including statements such as "HAPPY NEW YEARS MY LOVE!!!" and other intimate communications.

10. Throughout January and February 2025, Norman regularly communicated with Plaintiff regarding both work matters and sexual or romantic topics.

11. On January 9, 2025, Norman arranged to meet Plaintiff immediately after work and instructed her to leave work and enter his vehicle.

12. Following that meeting, Norman sent Plaintiff sexually explicit messages, including statements regarding Plaintiff's body and his desire to engage in sexual activity with her.

13. On January 10, 2025, Norman referenced their prior encounter and stated that it was "just a taste of what's to come."

14. Throughout January 2025, Norman continued cultivating a personal relationship with Plaintiff by providing gifts, food, attention, and other favors.

15. On January 31, 2025, Norman exchanged sexually explicit messages with Plaintiff and requested that Plaintiff come see him.

16. During the same period, Norman requested Plaintiff's Cash App information and transmitted money to Plaintiff.

17. Norman's conduct occurred while he maintained supervisory authority over Plaintiff's schedule, assignments, and employment opportunities.

Norman's Control Over Scheduling and Working Conditions

18. Throughout the relationship, Norman exercised substantial influence over Plaintiff's work schedule and assignments.

19. Plaintiff routinely communicated with Norman regarding scheduling, leave requests, work locations, and attendance issues.

20. On January 15, 2025, Plaintiff informed Norman that she would need time off for her daughter's medical appointment.

21. Norman instructed Plaintiff regarding the procedures necessary to obtain approval for the absence.

22. On January 30, 2025, Plaintiff requested reassignment to a warmer work location due to cold conditions, and Norman responded by directing her regarding how to manage those working conditions.

23. Norman's communications demonstrated his involvement in and influence over Plaintiff's day-to-day employment circumstances.

Quid Pro Quo Harassment

24. Defendant, acting through Norman, conditioned favorable treatment and employment opportunities upon Plaintiff's willingness to maintain a sexual relationship with him.

25. On February 11, 2025, while discussing work assignments and workplace issues, Norman stated, "I'm seeing you after work make it up to me."

26. At the time of that communication, Norman possessed supervisory authority over Plaintiff and was involved in matters affecting Plaintiff's scheduling and work opportunities.

27. Norman repeatedly intertwined employment-related discussions with requests for personal and sexual access to Plaintiff.

28. Plaintiff reasonably understood that Norman's continued favoritism, scheduling assistance, and workplace support were connected to the ongoing sexual relationship.

29. The power imbalance between supervisor and subordinate rendered Plaintiff particularly vulnerable to Norman's conduct.

Plaintiff Opposes the Harassment

30. By February 2025, the relationship between Plaintiff and Norman had deteriorated.

31. On February 19, 2025, Plaintiff confronted Norman regarding his conduct.

32. Plaintiff accused Norman of failing to schedule her despite knowing she needed income to support her child.

33. Plaintiff further accused Norman of requesting sexual content and sexual conduct in exchange for favorable treatment and job-related benefits.

34. Plaintiff complained that Norman had used his authority and influence over workplace opportunities while pursuing a sexual relationship with her.

35. Plaintiff expressly challenged Norman's conduct and opposed what she perceived to be unfair and sexually motivated treatment.

36. Plaintiff's complaints constituted protected activity under Title VII, the NYSHRL, and the NYCHRL.

Retaliatory Conduct

37. On February 22, 2025, Plaintiff reported that she could not access shifts through the eHub platform and expressed confusion regarding her employment status.

38. The timing of those access issues occurred after Defendant received Plaintiff's protected complaints.

39. Plaintiff subsequently sought clarification regarding her employment status.

Termination

40. On March 3, 2025, Lola Ramaseur sent Plaintiff a termination email on behalf of Defendant.

41. Defendant stated that Plaintiff was being separated from employment because of attendance-related issues.

42. Defendant terminated Plaintiff just weeks after Plaintiff's February 19, 2025, protected activity of expressly challenging Norman's conduct and opposing what she perceived to be unfair and sexually motivated treatment.

43. The close temporal proximity between Plaintiff's protected activity and her termination demonstrates an inference of retaliatory motive.

44. Defendant's stated attendance justification was pretextual.

45. As a direct and proximate result of Defendant's actions, Plaintiff suffered lost wages, lost benefits, emotional distress, humiliation, anxiety, and other damages according to proof.

46. Plaintiff received her "right to sue," notice from the U.S. Equal Employment Opportunity Commission on April 1, 2026. Plaintiff has complied with and satisfied all administrative requirements to pursue her claims before the United States District Court for the Southern District of New York.

AS AND FOR A FIRST CAUSE OF ACTION
(Sex Discrimination in Violation of Title VII of the Civil Rights Act of 1964.)
(Against All Defendants)

47. Plaintiff hereby repeats and re-alleges each allegation as if fully set forth herein.

48. Title VII of the Civil Rights Act of 1964 prohibits employers from discriminating against any individual with respect to her compensation, terms, conditions, or privileges of employment because of such individual's sex.

49. Defendants' conduct as alleged constitutes unlawful sex discrimination in violation of Title VII of the Civil Rights Act of 1964.

50. The stated reasons for Defendants' conduct were not the true reasons, but instead were pretext to hide the Defendants' discriminatory animus.

51. Defendant, through its agents and employees, subjected Plaintiff to unwelcome sexual advances, request for sexual favors, actual sexual conduct, and other verbal and physical conduct of a sexual nature.

52. The harassment was based on Plaintiff's sex and was sufficiently severe and pervasive to alter the conditions of Plaintiff's employment and created an abusive working environment.

53. Defendant knew or should have known of the harassment and failed to take immediate and appropriate corrective action.

54. Plaintiff was adversely affected by the practice of unlawful discrimination. Plaintiff has suffered substantial economic and noneconomic damages, and severe mental anguish and emotional distress in an amount to be determined at the hearing.

55. Defendants' discriminatory and otherwise unlawful conduct was knowing, malicious, willful and wanton, and/or showed a reckless disregard for Plaintiff, which entitles Plaintiff to an award of attorneys' fees.

AS AND FOR A SECOND CAUSE OF ACTION
(Discrimination - New York State Human Rights Law)
(Against All Defendants)

56. Plaintiff hereby repeats and re-alleges each allegation as if fully set forth herein.

57. Defendants discriminated against Plaintiff on the basis of her sex in violation of the State HRL by denying Plaintiff the same terms and conditions of employment available to employees of the opposite sex, including but not limited to terminating Plaintiff's employment.

58. As a direct and proximate result of Defendants' discriminatory conduct in violation of the State HRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic damages, including, but not limited to, loss of past and future income, compensation, and benefits, for which Plaintiff is entitled to an award of damages.

59. As a direct and proximate result of Defendants' discriminatory conduct in violation of the State HRL, Plaintiff has suffered and continues to suffer severe mental anguish and

emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, emotional pain and suffering, harm to her professional reputation, and loss of career fulfillment, for which she is entitled to an award of damages.

60. Defendants' unlawful discriminatory actions were intentional, malicious, willful, and wanton violations of State HRL for which Plaintiff is entitled to an award of punitive damages and attorneys' fees.

AS AND FOR A THIRD CAUSE OF ACTION
(Discrimination - New York City Human Rights Law)
(Against All Defendants)

61. Plaintiff hereby repeats and re-alleges each allegation as if fully set forth herein.

62. Defendants discriminated against Plaintiff on the basis of her sex in violation of the City HRL by denying Plaintiff the same terms and conditions of employment available to employees of the opposite sex, including but not limited to terminating Plaintiff's employment because of her age.

63. As a direct and proximate result of Defendants' discriminatory conduct in violation of the City HRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic damages, including, but not limited to, loss of past and future income, compensation, and benefits, for which Plaintiff is entitled to an award of damages.

64. As a direct and proximate result of Defendants' discriminatory conduct in violation of the City HRL, Plaintiff has suffered and continues to suffer severe mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, emotional pain and suffering, harm to her personal

professional reputations, and loss of career fulfillment, for which she is entitled to an award of damages.

65. Respondents' unlawful discriminatory actions were intentional, malicious, willful, and wanton violations of State HRL for which Claimant is entitled to an award of punitive damages and attorneys' fees.

AS AND FOR A FOURTH CAUSE OF ACTION
(Retaliation in Violation of New York State Human Rights Law)
(Against All Defendants)

66. Plaintiff hereby repeats and re-alleges each allegation as if fully set forth herein.

67. By the actions described above, Defendants retaliated against Plaintiff for protesting discrimination on the basis of her sex in violation of the NYSHRL.

68. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm for which she is entitled to an award of monetary damages and other relief.

69. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages and other relief.

70. Defendants' retaliatory actions were willfully negligent, reckless or committed with a conscious or reckless disregard of Plaintiff's rights under the NYSHRL.

AS AND FOR A FIFTH CAUSE OF ACTION
(Retaliation in Violation of New York City Human Rights Law)
(Against All Defendants)

71. Plaintiff hereby repeats and re-alleges each allegation as if fully set forth herein.

72. By the actions described above, Defendants retaliated against Plaintiff for protesting discrimination on the basis of her sex in violation of the NYCHRL.

73. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, monetary and/or other economic harm for which she is entitled to an award of monetary damages and other relief.

74. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering for which she is entitled to an award of monetary damages and other relief.

75. Defendants' retaliatory actions were willfully negligent, reckless or committed with a conscious or reckless disregard of Plaintiff's rights under the NYCHRL.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Angielina prays that the Court grant judgment in her favor and against Defendants, containing the following relief:

A. An order declaring Defendants conduct towards Plaintiff to have been unlawful and in violation of Title VII of the Civil Rights Act of 1964, NYSHRL, and NYCHRL;

B. An award of damages in an amount to be determined at the trial in this matter, plus pre- and post- judgment interest, to compensate Plaintiff for all monetary and/or economic harm;

C. An award of damages in an amount to be determined at the trial in this matter, plus pre- and post- judgment interest, to compensate Plaintiff for harm to his professional and personal reputations and loss of career fulfillment;

D. An award of damages in an amount to be determined at the hearing in this matter, plus pre- and post- judgment interest, to compensate Plaintiff for all non-monetary and/or compensatory harm, including, but not limited to, compensation for his mental anguish, humiliation, embarrassment, stress and anxiety, emotional pain and suffering, and emotional distress;

E. An award of punitive damages in an amount to be determined at the trial in this matter sufficient to discourage Defendants from repeating their unlawful conduct;

F. An award of all reasonable attorneys' fees, court costs, and disbursements as provided for to the fullest extent permitted by law;

G. An award of costs that Plaintiff incurred in this action, as well as Plaintiff's reasonable attorneys' fees to the fullest extent permitted by law;

H. A permanent injunction against Defendants; and

I. Such other and further relief this Honorable Court may deem just and proper.

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury as to all issues so triable.

Respectfully submitted,

DATED: June 4, 2026

STARPOINT, LC

By: *Benjamin D. Weisenberg*

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