

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

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JANE DOE,

Plaintiff,

-against-

COMPASS GROUP USA, INC. and CULINART,  
INC.,

Defendants.  
-----X

Case No.:

**COMPLAINT**

**PLAINTIFF DEMANDS  
A TRIAL BY JURY**

Plaintiff JANE DOE<sup>1</sup> (“Plaintiff”), by and through her attorneys, PHILLIPS & ASSOCIATES, Attorneys at Law, PLLC, hereby complains of Defendants and states as follows:

**NATURE OF THE CASE**

1. Plaintiff complains pursuant to Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e et seq. (“Title VII”); the New York State Human Rights Law, New York State Executive Law §§ 296 et seq. (“NYSHRL”); the New York City Human Rights Law, New York City Administrative Code §§ 8-107 et seq. (“NYCHRL”); and Civil Claims of Battery and Assault and seeks damages to redress the injuries Plaintiff has suffered as a result of being sexually harassed and subjected to quid pro quo sexual harassment, discriminated against and subjected to a hostile work environment on the basis of her gender/sex (female), and retaliated against for engaging in one or more protected activities.

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<sup>1</sup> Plaintiff proceeds with her Complaint anonymously.

**JURISDICTION, VENUE, AND PROCEDURAL PREREQUISITES**

2. Jurisdiction of this Court is proper under 29 U.S.C. § 216(b), 42 U.S.C. § 2000e-5(f)(3), and 28 U.S.C. §§ 1331 and 1343.
3. The Court has supplemental jurisdiction over the claims that Plaintiff has brought under State and City law pursuant to 28 U.S.C. § 1367.
4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) as Defendant resides within the Southern District of New York and/or the acts complained of occurred in the Southern District of New York.
5. By: (a) timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) on October 7, 2025; (b) receiving a Notice of Right to Sue from the EEOC on April 15, 2026; (c) commencing this action within 90 days of the issuance of the Notice of Right to Sue by the EEOC; and (d) contemporaneously with the filing of this Complaint, mailing copies thereof to the New York City Commission of Human Rights (“NYCCHR”) and the Office of the Corporation Counsel of the City of New York pursuant to the notice requirements of § 8-502 of the New York City Administrative Code, Plaintiff has satisfied all of the procedural prerequisites for the commencement of the instant action. A copy of the Notice of Right to Sue is annexed hereto as **Exhibit A**; a copy of the transmittal letter to the NYCCHR is annexed hereto as **Exhibit B**.

**PARTIES**

6. Plaintiff is a female resident of the State of New York, County of Queens.
7. Defendant COMPASS GROUP USA, INC. (“Defendant COMPASS”) is a foreign business corporation duly existing pursuant to, and by virtue of, the laws of the state of Delaware and authorized to do business in New York.

8. Defendant COMPASS has its headquarters at 2400 Yorkmont Road, Charlotte, North Carolina 28217.
9. Defendant COMPASS provides food service and facilities management services to customers in various business sectors.
10. Upon information and belief, Defendant COMPASS employed fifteen (15) or more employees.
11. At all relevant times herein, Plaintiff was an employee of Defendant COMPASS.
12. Defendant CULINART, INC. (“Defendant CULINART”) is one of Defendant COMPASS’ specialized operating companies that focuses on providing foodservice and management to various facilities throughout the United States, including healthcare facilities.
13. Defendant CULINART is a foreign business corporation duly existing pursuant to, and by virtue of, the laws of the state of Massachusetts that is authorized to do business in New York.
14. Defendant CULINART’s corporate headquarters are located at 2 International Drive, Rye Brook, New York 10573.
15. Upon information and belief, Defendant CULINART employed fifteen (15) or more employees.
16. Defendants COMPASS and CULINART, are collectively referred to herein as “Defendants.”
17. At all times relevant herein, Plaintiff was an employee of Defendants.
18. Upon information and belief, Defendants were contracted by Memorial Sloan Kettering Cancer Center (“MSK”) to provide and operate foodservices for their patients.
19. Upon information and belief, MSK owns and operates multiple hospitals including David H. Koch Center for Cancer Care located at 530 East 74<sup>th</sup> Street, New York, New York 10021, where Plaintiff worked.

20. At all relevant times herein, Defendants employed, managed, and supervised the kitchen staff assigned to work at MSK, including Plaintiff.
21. At all relevant times herein, Defendants maintained control over the administrative aspects of Plaintiff's employment as CULINART was the entity listed on her paystubs, yet both Defendants acted as Human Resources ("HR") during Plaintiff's employment.
22. At all relevant times herein, Defendants were Plaintiff's joint employers.

**MATERIAL FACTS**

23. In or around October 2024, Plaintiff interviewed with Director of Dining Michelle Gamer ("Gamer") Room Service Associate Supervisor Prentis Haywood ("HAYWOOD") for the position of Room Service Associate at MSK's David H. Koch Center for Cancer Care ("Center").
24. As the Room Service Associate Supervisor, HAYWOOD was Plaintiff's supervisor and/or had supervisory authority over Plaintiff, including the ability to hire, fire, discipline, or otherwise affect the terms and conditions of Plaintiff's employment or influence the decisionmaker of the same.
25. Gamer met Plaintiff for approximately five minutes and then left HAYWOOD to continue the interview.
26. After Gamer left the room, Plaintiff noticed that HAYWOOD was staring at her in a sexually suggestive manner, looking Plaintiff up and down. Plaintiff was conscious of HAYWOOD's attention and felt uncomfortable by his stares.
27. Plaintiff was later offered the position, which she accepted.
28. On or about December 20, 2024, Plaintiff began her employment with Defendants as a Room Service Associate, earning approximately \$22.50 per hour and working at the Center

approximately 40 hours per week, with the possibility of overtime. In the months that followed, Plaintiff often worked between 5 and 20 hours of overtime per week.

29. During Plaintiff's first days of training at the Center, HAYWOOD followed Plaintiff throughout the entirety of her shifts.
30. HAYWOOD's disproportionate shadowing of Plaintiff surpassed his duties as her supervisor, even catching the attention of other employees who told Plaintiff that they had suggested he stop following Plaintiff.
31. HAYWOOD continued to closely shadow Plaintiff.
32. Next, Plaintiff trained at MSK's main hospital located at 1275 York Avenue, New York, New York 10065. During these shifts, HAYWOOD was present and continued to follow Plaintiff.
33. HAYWOOD informed Plaintiff that after seeing her physical appearance during her interview, other kitchen staff employees wanted HAYWOOD to hire Plaintiff because she was attractive. Plaintiff felt uncomfortable by this comment.
34. HAYWOOD then repeatedly made comments to Plaintiff stating that he is a "jealous person" and that he knows "how those guys are," referring to Plaintiff's male coworkers.
35. HAYWOOD further stated that if Plaintiff looks "pretty," her coworkers would want to talk to her and take her for drinks.
36. HAYWOOD instructed Plaintiff not to engage with these coworkers and reiterated that he was a jealous person. Plaintiff felt extremely uncomfortable by her supervisor's comments that he would be "jealous" of Plaintiff's interactions with male coworkers in the workplace.
37. HAYWOOD also repeatedly shared that management did not want to hire Plaintiff and that another person was hired first. HAYWOOD emphasized that he wanted to hire Plaintiff

despite management's reservations. Plaintiff felt these statements by HAYWOOD were intended to create a sense of indebtedness to HAYWOOD.

38. Toward the end of December 2024, Plaintiff picked up her first paycheck from HAYWOOD. HAYWOOD invited Plaintiff to go for drinks to celebrate. Plaintiff obliged as HAYWOOD was her supervisor, and she was only a few weeks into her employment.
39. There, HAYWOOD revealed his true motivations, stating, in sum and substance, "You're mine. I've dreamt about you," and "I'll be good to you."
40. HAYWOOD implied that Plaintiff is obligated to do as he says because he hired her for her current position, asking, "You see I've already helped you get money, right?"
41. Plaintiff was surprised and uncomfortable with HAYWOOD's sudden proposition but felt that HAYWOOD had made it clear that Plaintiff "owed him" because he had hired her and trained her.
42. Thereafter, Plaintiff and HAYWOOD began having a romantic relationship.
43. Unfortunately for Plaintiff, her relationship with HAYWOOD quickly turned unhealthy and abusive, all the while HAYWOOD was Plaintiff's supervisor. In time, Plaintiff's work environment grew hostile.
44. By way of example, when Plaintiff and HAYWOOD had a personal or romantic argument, HAYWOOD punished Plaintiff at work by refusing to print her schedule and overworking her in different ways; either by assigning her too many tasks or not doing his own tasks to force Plaintiff to pick up his slack.
45. Plaintiff came to feel that if she upset HAYWOOD in even seemingly minor ways, HAYWOOD would make her workday difficult. This was a pattern that would continue over the coming months.

46. If Plaintiff complained about this mistreatment, HAYWOOD would become more upset and yell at Plaintiff.
47. Furthermore, HAYWOOD isolated Plaintiff from their coworkers. HAYWOOD would get jealous if he saw Plaintiff talking to a male coworker and assign her extra work in retaliation.
48. Eventually, Plaintiff started avoiding her male coworkers altogether to prevent upsetting HAYWOOD and worsening her work environment.
49. HAYWOOD also tried to isolate Plaintiff by telling her that her coworkers did not like her and that they were speaking poorly about her to management. HAYWOOD advised Plaintiff not to speak to her coworkers and frequently told Plaintiff that he was all she had.
50. Plaintiff grew scared that her job would be at risk if she did not maintain a relationship with HAYWOOD.
51. On or about February 7, 2025, Plaintiff attempted to end her relationship with HAYWOOD.
52. At the Center, HAYWOOD forced Plaintiff to speak with him privately in an office and blocked the exit, not allowing Plaintiff to leave the office until she agreed to stay in their relationship. Afraid for her safety, Plaintiff reluctantly complied.
53. Afterward, HAYWOOD gave Plaintiff a sum of money as an “apology” and promised to change.
54. However, this would be a pattern that occurred nearly weekly – Plaintiff would attempt to end their relationship, and HAYWOOD would corner her in an office or storage room, yelling and emotionally controlling her until she agreed not to leave him.
55. As time went on, Plaintiff made attempts to avoid HAYWOOD. In these circumstances,

HAYWOOD would convince Plaintiff to meet him privately by claiming he had to discuss work matters, a guise to argue with Plaintiff or have contact with her.

56. Other times, he would threaten to send Plaintiff home if she did not speak to him, accusing her of insubordination for refusing to meet him in a private room. Plaintiff was increasingly fearful of losing her job by upsetting HAYWOOD.
57. In or around March 2025, Room Service Associate Savitrie Nowrang (“Nowrang”) reported Plaintiff and HAYWOOD’s relationship to Human Resources.
58. Plaintiff later learned that Nowrang had a romantic relationship with HAYWOOD before Plaintiff began her employment with Defendants.
59. Following Nowrang’s report, Defendant CULINART’s HR directed HAYWOOD and Plaintiff to submit a written statement disclosing their relationship.
60. Thereafter, HAYWOOD forced Plaintiff to lie in her statement, denying they were romantically involved. HAYWOOD held Plaintiff in an office against her will, blocking the exit, while he oversaw and directed her to write the statement.
61. Although Plaintiff and HAYWOOD did not confirm their relationship in writing to HR, HAYWOOD was open and notorious about their relationship with their coworkers.
62. It was widely known amongst colleagues that Plaintiff and HAYWOOD were in a romantic relationship.
63. On or about March 11, 2025, Plaintiff once again attempted to break up with HAYWOOD and informed him via text message that she would be blocking his number. Plaintiff asked that he not retaliate against her for ending their relationship. Plaintiff’s text read:

“[HAYWOOD] I’m blocking this number. Please only call text (*sic.*) me about work during work hours using the phone number everyone else has. I’m hoping you will be fair to me. I will not say anything if you’re (*sic.*) resort back to your old ways because it

won't have anything to do with me. If you want me to try to avoid you I will. If you haven't guessed.. (*sic.*) I'm concerned we won't have a smooth break up n (*sic.*) you're supervisor so you it (*sic.*) can be bad"

64. After she sent the March 11, 2025, message to HAYWOOD, he once again cornered Plaintiff into an office and refused to allow her to leave, yelling at her to get back together with him and unblock his number. Fearing for her physical safety, Plaintiff was forced to unblock his phone number and affirm that she was willing to continue the relationship.
65. Around this time, HAYWOOD's continued manipulation caused Plaintiff extreme anxiety, especially at work. Plaintiff's mental health was severely impacted by HAYWOOD's harassment and abuse, frequent overworking, and isolation from her coworkers.
66. Plaintiff would call out of work some days due to the anxiety she felt going to work. Plaintiff would feel physically sick during her commute and call out even if she were almost at work because she could not handle the mental and physical harassment from HAYWOOD.
67. On or about March 29, 2025, Plaintiff texted Defendant CULINART's Human Resources Business Partner Nicole Henry ("Henry") asking if it would be possible to transfer to a different location of Defendants'.
68. A few days after Plaintiff's text, Henry visited Plaintiff's location to discuss her transfer request. Although Plaintiff did not explicitly disclose HAYWOOD's sexual harassment and abuse for fear of retaliation, Plaintiff cited difficulties working with HAYWOOD and Gamer as her reason for requesting a transfer.
69. Unfortunately, Henry denied Plaintiff's request, stating that Defendants needed Plaintiff at the Center. Henry also dismissed Plaintiff's complaints about the work environment, telling her not to let anybody "run her out of her job."

70. On or about May 2, 2025, Plaintiff was standing next to male coworker, Sadiq (last name unknown) (“Sadiq”), while they waited for the elevator when HAYWOOD saw the two standing together and became irate and jealous.
71. HAYWOOD took his anger out on Plaintiff by speaking aggressively to her and assigning her extra work tasks, as he often did when he was upset with her.
72. Moreover, HAYWOOD threatened to in effect reduce Plaintiff’s opportunity to earn overtime, saying he would hire another employee to take overtime hours away from Plaintiff. Based on HAYWOOD’s threats, Plaintiff felt that rebuffing HAYWOOD would result in a loss of income and loss of her job with Defendants.
73. After this incident, Plaintiff avoided Sadiq to prevent angering HAYWOOD, furthering Plaintiff’s isolation and anxiety in the workplace.
74. In or about June 2025, HAYWOOD informed Plaintiff that another employee, Cynthia (last name unknown) (“Cynthia”), had reported him for sexual harassment, alleging that HAYWOOD had made inappropriate and sexual remarks to her.
75. Cynthia’s sexual harassment complaint and HAYWOOD’s previous relationship with Nowrang revealed to Plaintiff that HAYWOOD had a history and pattern of inappropriate relations with other women in Defendants’ workplaces.
76. On or about June 24, 2025, Plaintiff requested a meeting with Gamer, citing that she had been overwhelmed with the amount of work HAYWOOD had been assigning her.
77. As the Director of Dining, Gamer was Plaintiff’s supervisor and/or had supervisory authority over Plaintiff, including the ability to hire, fire, discipline, or otherwise affect the terms and conditions of Plaintiff’s employment or influence the decisionmaker of the same.
78. During this meeting, Gamer told Plaintiff that she should “talk it out” with HAYWOOD

because they “work well together,” then brought HAYWOOD into the meeting, despite Plaintiff protesting the same.

79. Then, Gamer stepped out of the room to let Plaintiff and HAYWOOD speak privately. Immediately, HAYWOOD became aggressive with Plaintiff, physically intimidating her. Gamer quickly returned to the room and instructed HAYWOOD to step away from Plaintiff.
80. Although she witnessed HAYWOOD’s hostile and aggressive behavior towards Plaintiff, Gamer dismissively told HAYWOOD to, in sum and substance, “give [Plaintiff] a break” and suggested that he not assign Plaintiff extra work. HAYWOOD apologized in front of Gamer.
81. Upon information and belief, Gamer did not take any punitive or remedial action against HAYWOOD related to Plaintiff’s complaint.
82. On or about June 26, 2025, HAYWOOD saw Plaintiff speaking to another male coworker, Jaffar (last name unknown) (“Jaffar”), and became jealous. HAYWOOD spoke to Plaintiff aggressively and slammed objects around. He also refused to do any work, leaving Plaintiff to complete all of the collective tasks alone.
83. Plaintiff then texted Gamer asking her to intervene. Plaintiff wrote that: “It’s clear [HAYWOOD] is mad that I spoke with jaffar (*sic.*) please ask him to calm down before things get out of hand”.
84. In or around early July 2025, Plaintiff confronted her coworkers about them talking about her behind her back, a lie HAYWOOD repeatedly told her. All of the coworkers denied feeling any negativity towards Plaintiff or speaking badly about her. Plaintiff was upset and disturbed by the realization that HAYWOOD had been lying to her to isolate her from

her coworkers.

85. From this point on, Plaintiff ignored HAYWOOD and began interacting with her coworkers. HAYWOOD was upset with Plaintiff's change in behavior and attitude.
86. On or about July 23, 2025, HAYWOOD once again forced Plaintiff to speak with him privately because he was upset that Plaintiff was speaking to her coworkers.
87. After this incident, Plaintiff called Defendant COMPASS's HR and asked to meet with someone in person to discuss HAYWOOD.
88. On or about July 24, 2025, Plaintiff met with COMPASS' HR Advisor Traci Batchelder ("Batchelder").
89. During the meeting, Plaintiff complained specifically that she felt afraid for her physical safety while working with HAYWOOD and that HAYWOOD had grown increasingly "inappropriate" and "controlling" of her.
90. Plaintiff told Batchelder that she was afraid HAYWOOD would behave even more aggressively if he found out she had reported him to HR.
91. Plaintiff asked Batchelder for assurance that Defendants would prevent HAYWOOD from retaliating against her by "sabotaging" her at work.
92. Batchelder responded, in sum and substance, "Don't worry, girl. [HAYWOOD] doesn't have as much power as he thinks he has. I got you, girl." Batchelder further assured Plaintiff that she did not need to fear for her physical safety while at work. Plaintiff understood this to be an assurance that Batchelder would take some sort of corrective action against HAYWOOD.
93. After Plaintiff's meeting with HR, HAYWOOD further escalated his conduct to physical assault. While yelling at Plaintiff, HAYWOOD put both of his hands around her neck and

applied pressure. Plaintiff was extremely alarmed and scared for her physical safety due to HAYWOOD's increasing physical violence.

94. Further, to Plaintiff's knowledge, Defendants failed to take corrective action, despite Batchelder promising to do so, because HAYWOOD's threatening behavior escalated and Plaintiff remained working in close proximity to HAYWOOD.
95. On or about July 25, 2025, Plaintiff was running late to work and informed Head Chef/Chef Supervisor Mike (last name unknown) ("Mike") by text message.
96. As Head Chef/Chef Supervisor, Mike was Plaintiff's supervisor and/or had supervisory authority over Plaintiff including the ability to hire, fire, discipline, or otherwise affect the terms and conditions of Plaintiff's employment or influence the decisionmaker of the same.
97. When Plaintiff arrived at work, Gamer approached Plaintiff and expressed annoyance that Plaintiff had contacted Mike about her lateness rather than HAYWOOD. Plaintiff explained that Mike was normally her point of contact in this situation and that she did not want to have any contact with HAYWOOD and would reach out to HR regarding the same.
98. In response, Gamer tried to convince Plaintiff not to submit a report to HR, stating in sum and substance, "You don't have to talk to HR; you can talk to me. What's going on?" Plaintiff stated that she would like to report to a different supervisor and that she would contact HR.
99. Gamer then coldly told Plaintiff, in sum and substance, "Okay. Watch, watch," and took out her phone as she walked away. Plaintiff felt Gamer reacted this way to intimidate Plaintiff into refraining from contacting HR.
100. Nevertheless, Plaintiff then sent the below email to Henry:

"I've been sexually harassed for many months now. I have texts & calls to prove it. I've attempted to refrain from sharing for concerns

of my safety, I have reiterated this in text to [Gamer]. However, I do believe what I have shared thus far is enough for management to allow me use (*sic.*) another supervisor as a point of contact. I have reported already, Prentis has attempted to isolate me and I have proof. He has been physical. I have shared he is upset because I am talking to ALL OF MY coworkers and ONCE AGAIN, I have proof. I met with someone with HR yesterday and she was very pleasant and easy to talk to. Once again, ill (*sic.*) reiterate—[HAYWOOD] has fueled chaos between myself and other employees for the simple fact of him wanted (*sic.*) to control me. Once I realized what he was doing, I pulled both Brenda and Jaysmen aside where both began to deny all of [HAYWOOD's] claims. I've also done this with several other employees. Because I don't like to feel manipulated, I decided then and there I was going to talk to everyone [HAYWOOD] attempted to isolate me from. Now he's showing he (*sic.*) upset. My reason for calling a meeting with HR yesterday was to put things in place where not only do I not have to engage with him but so I can make sure his efforts to sabotage me are null and void....”

101. Plaintiff then detailed the interaction with Gamer that had just transpired to HR.
102. Approximately half an hour later, Plaintiff realized that Gamer had clocked Plaintiff out without her knowledge or consent. Plaintiff noticed she was clocked out around 2:00 p.m., which was around the time Gamer confronted Plaintiff about her complaining to HR. Upon information and belief, when Gamer walked away with her phone in her hand, she was clocking Plaintiff out in retaliation for complaining to HR.
103. After Plaintiff left work, she called Defendant COMPASS's HR hotline to report HAYWOOD for sexual harassment and Gamer for retaliation.
104. That same day, Plaintiff also informed Mike that she did not want to have any contact with HAYWOOD. Plaintiff texted:

Mike I'm not going to contact [HAYWOOD]

For future reference I will not if you'd like me to contact [Gamer] or jaffar I will but I will not contact [HAYWOOD]

[HAYWOOD] is blocked from my phone and I will not unblock him.
105. The next day, on or about July 26, 2025, Plaintiff arrived for her shift to find that Gamer

had instructed some of the Unit Clerks to perform Plaintiff's job duties. Gamer instructed them to send her pictures of the work they had completed, in an apparent attempt to make it seem like Plaintiff was not doing her tasks.

106. Upon information and belief, Gamer also told coworkers that Plaintiff had abandoned her job the day before, as an explanation to why the Unit Clerks were performing her duties.
107. Plaintiff followed up on her complaint to Henry reporting the additional retaliation she experienced from Gamer. Plaintiff stated that she "was upset" that Gamer had clocked her out, writing, "I lost my shift because I emailed HR."
108. On or about July 28, 2025, Batchelder contacted Plaintiff regarding her complaint against Gamer. Batchelder informed Plaintiff that they would be interviewing the leadership team to investigate her report.
109. On or about July 29, 2025, Plaintiff received a response to her sexual harassment complaint to Defendant COMPASS's HR. Sanique Pierce ("Pierce"), Defendant COMPASS's HR Advisor, emailed Plaintiff with follow up questions.
110. Plaintiff answered the next day, on or about July 30, 2025:

"In January 2025, I entered a consensual relationship with [HAYWOOD]. Although it was consensual, I felt pressured to enter this relationship to remain employed. This caused tension at work because [HAYWOOD] was dating Savitrie Nowrang before I arrived but I had no idea. Savitrie targeted me for many months as [HAYWOOD] fueled chaos and triangulated us. During this time, [HAYWOOD] lied and manipulated both parties. During the first six months [HAYWOOD] splurged on five star dinner dates, cash gifts and other expensive gifts outside of work, but while at work – he required I blindly trusted him as he isolated me from co workers, family members, and spewed inappropriate remarks to others at work. [HAYWOOD] was manipulative as he screenshot management text and replied 'you see they want me to write you up they don't like you all you have is me'. If I accidentally mad (*sic.*) [HAYWOOD] mad or if someone complimented me informs (*sic.*) of him he become jealous and disappear refusing to complete most

task. I attempted to break up with [HAYWOOD] in multiple occasions however he knew I was afraid he'd sabotage my employment and he used that against me. Because of this I would ultimately accept he (*sic.*) empty apologies and/or cash gifts but I felt like I was fading and losing (*sic.*) myself while with him. On multiple occasions [HAYWOOD] shared, I belong to him and 'you're my wife for life'. There's been multiple occasions where I've attempted to go 'low contact' and [HAYWOOD] cornered me in the storage room and refused to allow me to leave until I spoke to him and/or forgave me for his behavior. While I have never allowed [HAYWOOD] inside of my home- he has been over multiple times and fueled aggressive arguments. When I denied or (*sic.*) relationship to HR- I was and still am terrified because [HAYWOOD] shared the following statements 'if you report me well (*sic.*) both get fired" and "we will lose (*sic.*) the account and everyone will lose (*sic.*) their jobs". However I do not feel like I should have to be with someone who is emotionally abusive so that everyone can remain employed.

A few weeks ago, I questioned if [HAYWOOD] was actually telling me the truth when he shared 'both Brenda and jaysmen are snitching on you to [Gamer] don't talk to them". Both parties denied they said both statements and it was at that moment when I decided not only will I speak to everyone [HAYWOOD] attempted to isolate me from but I will also go 'no contact' with him because he has always manipulated me into staying in a relationship with him and lowering my boundaries.

This triggered the response on Friday when I texted Mike, as per usual, however [Gamer] insisted I contact [HAYWOOD] instead.

I am scared because [HAYWOOD] is manipulative and I do not want to upset him because I am unaware how he will behave when he is upset.

...

I understand I have several issues in the past. Please know [HAYWOOD] triangulated us and I had no idea they were in a relationship before I arrived. I apologize. I blindly trusted my supervisor and suffered in the end. I was diagnosed with severe anxiety and needed to change my medication regimen because of this.

The resolution I am looking for is that I can break up with [HAYWOOD] in peace without being sabotaged by him or [Gamer]. I am not asking he loses (*sic.*) his job."

111. Pierce responded with additional follow-up questions. Plaintiff did not reply as she was

increasingly fearful for her physical safety after she was assaulted by HAYWOOD following her prior report to HR.

112. Further, Defendants had not taken any action to prevent further harassment by HAYWOOD, as HAYWOOD was still permitted to work for Defendants and no action had been taken to separate the two.
113. Indeed, even after Plaintiff's complaints, Plaintiff and HAYWOOD continued to share a workspace, sitting nearly shoulder to shoulder.
114. On or about August 5, 2025, Pierce emailed Plaintiff that her sexual harassment complaint was closed because Plaintiff did not provide the additional requested information.
115. Later that day, HAYWOOD confronted Plaintiff after he found out that she had reported him to HR. Plaintiff ran into the stairwell to avoid him. However, HAYWOOD followed her, chasing Plaintiff up multiple flights of stairs.
116. When HAYWOOD finally stopped Plaintiff, he proceeded to yell and berate Plaintiff for reporting him after "everything he's done for her" and put his hands around her neck again in an attempt to strangle her.
117. Despite a number of employees passing Plaintiff and HAYWOOD in the stairwell and staring at HAYWOOD with his hands on Plaintiff's neck, no one intervened and helped Plaintiff. Plaintiff was afraid for her physical safety and told HAYWOOD that she did not respond to HR's follow-up email in an attempt to calm him down.
118. After this altercation, Plaintiff called MSK's security guard, Jonathan Alonso ("Alonso"), reporting HAYWOOD's assault and asking for help. Alonso informed Plaintiff that there was nothing he could do except help Plaintiff avoid blind spots in the Center's security cameras.

119. Alonso knew that HAYWOOD had been terrorizing and sexually harassing Plaintiff. Plaintiff frequently called him after an incident with HAYWOOD to ask for help. Although Alonso could not take any action against HAYWOOD, Alonso would inform Plaintiff when HAYWOOD was present or when he was approaching her location so that Plaintiff could leave, evidencing the open and notorious way that HAYWOOD was harassing Plaintiff in the workplace.
120. On or about August 11, 2025, Batchelder emailed Plaintiff that her investigation did not find any evidence of unfair or inappropriate treatment from Gamer. Therefore, no action was taken against Gamer for retaliating against Plaintiff for complaining to HR.
121. The next day, on or about August 12, 2025, Plaintiff took a break outside the Center. Nevertheless, HAYWOOD found her and again became aggressive and hostile. HAYWOOD then took Plaintiff's phone to lure her to the corner of the block.
122. Once at the corner, HAYWOOD slammed Plaintiff's phone on the ground, breaking the screen, then refused to give her phone back to prevent Plaintiff from calling anyone for help. HAYWOOD then proceeded to strangle Plaintiff, hit her, and throw her against the wall. Multiple bystanders intervened and called the police.
123. When the police arrived, HAYWOOD threatened Plaintiff that he was not "going down by [himself]" and that he would get Plaintiff arrested too. Thereafter, Plaintiff was too afraid to report HAYWOOD's assault to the police while in front of HAYWOOD. After separating HAYWOOD from Plaintiff and retrieving her phone from him, the police officers left.
124. After HAYWOOD assaulted her, Plaintiff went back into the Center and hid in the women's restroom/locker room, locking the door to prevent HAYWOOD from attacking

her further.

125. HAYWOOD waited outside the locked restroom and repeatedly asked Plaintiff to come out as she begged him to let her leave for the day. When Plaintiff would not leave the restroom, HAYWOOD threatened Plaintiff's job to force her out. When threatening her job did not work, HAYWOOD threatened Plaintiff directly, stating, in sum and substance, "I should punch you in your fucking face right now."
126. Eventually, HAYWOOD left. Only once she was sure HAYWOOD was on another floor did Plaintiff leave the women's restroom.
127. After leaving work, Plaintiff called the precinct of the police officers who had intervened during HAYWOOD's assault. Plaintiff was advised to go to the precinct the next day.
128. The next day, on or about August 13, 2025, Plaintiff went to the police precinct and filed a police report against HAYWOOD. Plaintiff's report stated:

"I have been attempting to break up with my Supervisor, [HAYWOOD], for months now. HR did nothing yesterday. I attempted to get away from [HAYWOOD] by stepping outside but he followed. [HAYWOOD] took my phone and lured me to where the highway is on 73<sup>rd</sup> street. There he choked me grabbed me threw me on the wall and hit me. He then broke the screen on my phone. Everytime I tried to get away he would grab and hit me. Multiple cars were pulling over...on both sides but he didn't care until the police came. I wanted to get away and walk down the block but he didn't let me. So I went back to the building and he followed me to the staff floor 10<sup>th</sup> floor where he stood outside the woman's bathroom waiting for me. He said 'I should punch you in your fucking face right now.' I stayed in the locker room while I begged him to let me leave for the day. When I knew he was on another floor, I left"

129. The police officers that spoke with Plaintiff then called an ambulance to take her to the hospital to have her injuries examined and treated.
130. After this incident, Plaintiff renewed her prior written complaint to HR, responding to their

August 5, 2025, email:

“Please allow this email to serve as a renewed complaint of sexual harassment and assault against [HAYWOOD].

Despite my complaints of sexual harassment and explicit rejections, [HAYWOOD] has continued to pursue me. On multiple occasions, his harassment has turned physical. Yesterday, I attempted to take a break from [HAYWOOD] by sitting outside for 15mins (*sic.*) however he followed me outside where he taunted and harassed me. I tried to get away but he took my phone and lured me to the end of the corner where he choked me hit me and threw me against the wall. Every time I tried to get away he got worse and more aggressive. Multiple people pulled over to help and then the Police (*sic.*) showed up and intervened. He didn’t let me go down the block so I went to inside the hospital instead. [HAYWOOD] then followed me to 10 floor where he stood outside the woman’s locker/bathroom waiting for me. I’ve reported his sexual harassment and aggression and I’m scared because he’s a lot strong (*sic.*) than I am and doesn’t seem to care because ... he choked me on the staircase 6<sup>th</sup> floor. Even though I have broken off our relationship and made it clear many times I do not want to be with him, [HAYWOOD] keeps harrsing (*sic.*) and pursuing me for a sexual and romantic relationship. Things have gotten a lot worse physically all while he texts me constantly stating ‘I still love you’. As a result of management and HRs (*sic.*) failure to intervene [HAYWOOD] has continued to harass and assault me in the work place with no consequence. This has been really bad for my mental health as I’ve already shared I was diagnosed with anxiety n (*sic.*) depression and have since had to change my medication regiment. I’m unsure if I can recover emotionally right now.”

131. Plaintiff sent a copy of the above complaint to Henry, who forwarded Plaintiff’s matter to Tracey Davis (“Davis”), Defendant CULINART’s HR Manager.
132. Plaintiff never received a reply to her renewed complaints against HAYWOOD.
133. On or about August 16, 2025, Plaintiff emailed Davis requesting a temporary medical leave for three to five days, citing emotional distress from HAYWOOD’s harassment and August 12, 2025, assault. Plaintiff wrote: “I can’t recover while I’m there because I am not physically save in around (*sic.*) Msk hospital at this time.”
134. Plaintiff submitted a letter from her therapist corroborating her “notable emotional distress

and heightened anxiety” and requesting accommodation. Plaintiff’s therapist asserted that “continued direct interaction with the involved individual may exacerbate [Plaintiff’s] symptoms and impede her recovery.” Plaintiff’s therapist then recommended the following steps to “ensure [Plaintiff’s] physical and psychological safety at work”: “Modifying her work schedule or duties to avoid contact with the involved individual; exploring alternative supervisory arrangements; considering temporary leave if no safe accommodation is possible.”

135. On or about August 18, 2025, Plaintiff requested a transfer for the second time via email to Davis. Davis informed Plaintiff that Defendants do not “transfer,” so Plaintiff would have to apply for a different job and be selected.
136. Defendants never separated Plaintiff and HAYWOOD despite having notice of multiple complaints of harassment and of a physical assault on Plaintiff by HAYWOOD.
137. On or about August 19, 2025, a judge granted Plaintiff a Temporary Order of Protection against HAYWOOD.
138. On or about August 25, 2025, Plaintiff submitted her resignation via email, stating:

“...I am writing to tender my resignation as RSA at Compass Group effective August 26, 2025. It is with deep regret that I have reached this decision, but I believe it is in my best interest to resign due to ongoing harassment I have been experiencing.

Over the past seven months I have encountered persistent and unacceptable sexual harassment, physical and psychological abuse by my supervisor, which has created an unhealthy and hostile work environment. Despite my efforts to address the issue through appropriate channels by alerting human resources of the ongoing sexual harassment, no significant action has been taken to alleviate the situation. In fact, the lack of remedial action with respect to my complaints has allowed [HAYWOOD] to continue to harass, and even assault me, at work. As a result, my productivity, physical safety, and mental well-being have been severely impacted.

It is unfortunate that my time here has been overshadowed by this

negative experience. Once again, I sincerely regret having to take this step, but I believe it is necessary for my personal and professional well-being...”

139. **Therefore, Defendants constructively discharged Plaintiff, effective August 26, 2025.**

140. Despite Plaintiff’s multiple complaints against HAYWOOD, HAYWOOD remains employed with Defendants and has not been reprimanded in any way.

141. **Defendants treated Plaintiff differently, solely due to her sex/gender (female).**

142. Plaintiff was subjected to and suffered discriminatory treatment and sexual harassment solely due to her gender/sex (female).

143. Plaintiff’s work environment was permeated with hostility due to her gender/sex.

144. Plaintiff was also retaliated against for engaging in protected activity, specifically for complaining about the severe and pervasive sexual harassment, discrimination, and hostile work environment which Defendants repeatedly subjected her to.

145. Plaintiff has been unlawfully discriminated and retaliated against, humiliated, degraded and belittled, and as a result, suffered a violation of her rights, emotional distress, loss of income/earnings, loss of salary, loss of benefits, special damages, legal fees/costs, loss of enjoyment of life, economic hardship, inconvenience, and emotional pain and suffering.

146. Defendants knowingly and willfully subjected Plaintiff to inferior terms, conditions, or privileges of employment due to her gender/sex.

147. Defendants had knowledge of and/or acquiesced in the gender/sex discrimination by their employees.

148. Defendants have engaged in and continue to encourage and foster a policy and practice of gender/sex discrimination and allowing sexual harassment to occur in the workplace.

149. As a result of the acts and conduct complained of herein, Plaintiff feels extremely humiliated, degraded, victimized, embarrassed, belittled, and emotionally distressed.

150. Defendants' conduct has been malicious, willful, outrageous and conducted with full knowledge of the law.

151. As such, Plaintiff demands punitive damages as against Defendants.

**AS A FIRST CAUSE OF ACTION**  
**DISCRIMINATION AND HOSTILE WORK ENVIRONMENT UNDER TITLE VII**

152. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.

153. This claim is authorized and instituted pursuant to the provisions of Title VII for relief based upon the unlawful employment practices of Defendants.

154. Plaintiff complains of Defendants' violation of Title VII's prohibition against discrimination in employment based, in whole or in part, upon an employee's **sex/gender**.

155. Defendants engaged in unlawful employment practices by discriminating against Plaintiff because of her **sex/gender (female)**.

**AS A SECOND CAUSE OF ACTION**  
**RETALIATION UNDER TITLE VII**

156. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.

157. Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-3(a) provides that it shall be unlawful employment practice for an employer:

(1) to . . . discriminate against any of his employees . . . because [s]he has opposed any practice made an unlawful employment practice by this subchapter, or because [s]he has made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under this subchapter.

158. Defendants engaged in unlawful employment practice prohibited by Title VII by discriminating against Plaintiff with respect to the terms, conditions or privileges of

employment because of her opposition to the unlawful employment practices of Corporate Defendants.

**AS A THIRD CAUSE OF ACTION**  
**DISCRIMINATION AND HOSTILE WORK ENVIRONMENT UNDER THE NYSHRL**

159. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.

160. Executive Law § 296 provides that,

1. It shall be an unlawful discriminatory practice: (a) For an employer or licensing agency, because of an individual's age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status, or domestic violence victim status, to refuse to hire or employ or to bar or to discharge from employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment.

161. Defendants engaged in unlawful discriminatory practices by discriminating against Plaintiff because of her sex/gender (female).

**AS A FOURTH CAUSE OF ACTION**  
**RETALIATION UNDER THE NYSHRL**

162. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.

163. Executive Law § 296 provides that, “7. It shall be an unlawful discriminatory practice for any person engaged in any activity to which this section applies to retaliate or discriminate against any person because he or she has filed a complaint, testified, or assisted in any proceeding under this article.”

164. Defendants engaged in unlawful discriminatory practices by discriminating against Plaintiff because of her opposition to the unlawful employment practices of the Defendants.

**AS A FIFTH CAUSE OF ACTION**  
**DISCRIMINATION UNDER THE NYCHRL**

165. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.

166. New York City Administrative Code §8-107(1) provides that:

It shall be an unlawful discriminatory practice: (a) For an employer or an employee or agent thereof, because of the actual or perceived age, race, creed, color, national origin, **gender**, disability, marital status, sexual orientation or alienage or citizenship status of any person, to refuse to hire or employ or to bar or to discharge from employment such person or to discriminate against such person in compensation or in terms, conditions or privileges of employment.

167. Defendants engaged in unlawful discriminatory practices by discriminating against Plaintiff because of her **sex/gender (female)**.

**AS A SIXTH CAUSE OF ACTION**  
**RETALIATION UNDER THE NYCHRL**

168. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.

169. The New York City Administrative Code §8-107(7) provides that it shall be unlawful discriminatory practice: “For an employer . . . to discriminate against any person because such person has opposed any practices forbidden under this chapter. . .”

170. Defendants engaged in unlawful discriminatory practices in violation of New York City Administrative Code §8-107(7) by discriminating against Plaintiff because of Plaintiff’s opposition to the unlawful employment practices of the Defendants.

**JURY DEMAND**

171. Plaintiff requests a jury trial on all issues to be tried.


**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests that this Court enter a judgment:

- A. Declaring that Defendants engaged in unlawful employment practices prohibited by Title VII, the NYCHRL, and the NYSHRL in that Defendants discriminated and retaliated against Plaintiff on the basis of her gender/sex (female);
- B. Awarding damages to Plaintiff for all lost wages and benefits resulting from Defendants' unlawful discrimination and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices;
- C. Awarding Plaintiff compensatory damages for mental, emotional and physical injury, distress, pain and suffering and injury to her reputation in an amount to be proven;
- D. Awarding Plaintiff punitive damages;
- E. Awarding Plaintiff reasonable attorneys' fees, costs, and expenses incurred in the prosecution of this action; and
- F. Awarding such other legal and equitable relief as this Court deems necessary, just, and proper.

Dated: New York, New York  
June 3, 2026

**PHILLIPS & ASSOCIATES,  
ATTORNEYS AT LAW, PLLC**

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