

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
SLIMS FLORENTINO

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK; JESSICA S. TISCH; MARTINE
N. MATERASSO; CHRIS D. MORELLO; JOSE L.
CARABALLO; ALBERTO GONZALEZ; JOHN J.
SEMINERIO; NATALIE L. BARNES; OLIVIA SICILIANO;
YADIRIS A. TAVERAS; MATTHEW S. MISENER; ABEL
GUERRERO-CEDENO; ASTRID A. ORTIZ;
ANYSSACHEYENNE A. BIGGS; JADAMIL SANCHEZ;
CIELO P. COLON; and MERAJ A. CHAUDARY

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.

Venue is designated in Bronx County pursuant to CPLR § 504(3) because defendant THE CITY OF NEW YORK is a party to this action, the events complained of occurred within the City of New York, and plaintiff designates Bronx County as the place of trial.

Venue is also proper pursuant to CPLR § 503(a) because, upon information and belief, one or more defendants resides in Bronx County, works in Bronx County, conducts Department business in Bronx County, is assigned to duties connected to Bronx County, or has material employment, training, operational, or disciplinary ties to Bronx County.

Venue is further proper because material events, effects, training assignments, Department operations, employment consequences, and damages connected to this action occurred in or were felt in Bronx County.

The principal Academy-based workplace events occurred in Queens County, including the hostile work environment, coordinated threats, property damage, retaliation, training exclusion, disciplinary escalation, and forced-resignation sequence at the NYPD Police Academy. Material personnel, disciplinary, Risk Management, Police Commissioner, Department Advocate, Training Bureau, and related NYPD operations involving defendant JESSICA S. TISCH and other Department decisionmakers are located in New York County. However, because defendant THE CITY OF NEW YORK is a party, the complained-of events occurred within the City of New York, and Bronx County has a material connection to the parties, training, Department operations, and employment consequences alleged herein, venue is properly designated in Bronx County.

Dated: June 15, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SLIMS FLORENTINO

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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

THE CITY OF NEW YORK; JESSICA S. TISCH; MARTINE N. MATERASSO; CHRIS D. MORELLO; JOSE L. CARABALLO; ALBERTO GONZALEZ; JOHN J. SEMINERIO; NATALIE L. BARNES; OLIVIA SICILIANO; YADIRIS A. TAVERAS; MATTHEW S. MISENER; ABEL GUERRERO-CEDENO; ASTRID A. ORTIZ; ANYSSACHEYENNE A. BIGGS; JADAMIL SANCHEZ; CIELO P. COLON; and MERAJ A. CHAUDARY
c/o New York City Police Department
Legal Bureau
One Police Plaza
New York, N.Y. 10038

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SLIMS FLORENTINO

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Verified Complaint

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CIELO P. COLON; and MERAJ A. CHAUDARY

Defendants
-----X

Plaintiff SLIMS FLORENTINO, by her attorney THE SANDERS FIRM, P.C., complaining
of defendants THE CITY OF NEW YORK; JESSICA S. TISCH; MARTINE N. MATERASSO;
CHRIS D. MORELLO; JOSE L. CARABALLO; ALBERTO GONZALEZ; JOHN J.
SEMINERIO; NATALIE L. BARNES; OLIVIA SICILIANO; YADIRIS A. TAVERAS;
MATTHEW S. MISENER; ABEL GUERRERO-CEDENO; ASTRID A. ORTIZ;
ANYSSACHEYENNE A. BIGGS; JADAMIL SANCHEZ; CIELO P. COLON; and MERAJ A.
CHAUDARY, alleges as follows:

INTRODUCTION

This action arises from the New York City Police Department’s treatment of plaintiff
SLIMS FLORENTINO, a Dominican woman and former probationary police officer recruit
assigned to the NYPD Police Academy.

FLORENTINO entered the Academy qualified and successfully performed required academic, physical, and firearms components. She passed the 1.5-mile run, the Job Standard Test, written examinations, and firearms qualification. Performance was not the problem. The problem was the Department's response after FLORENTINO reported hostile, discriminatory, retaliatory, and unsafe Academy conditions.

FLORENTINO alleges that the Academy environment included gendered hostility, sexualized assumptions, race, ethnicity, and national-origin hostility, isolation, restroom surveillance, property damage, coordinated threats, and a planned locker-room assault by fellow recruits. When FLORENTINO reported the planned assault and group-chat evidence, defendants failed to preserve evidence, failed to protect her from retaliation, and failed to treat her as a victim, complainant, witness, and protected-activity source.

Instead, the Department allegedly turned against her. After defendant ABEL GUERRERO-CEDENO struck FLORENTINO from behind with a duffle bag, injuring her leg, Department supervisors sexualized the incident, suggested it may have been a "bad method of flirting," and falsely framed the matter as "domestic violence other MOS on MOS," despite the absence of any qualifying domestic, romantic, intimate, family, or statutory relationship between FLORENTINO and GUERRERO-CEDENO.

FLORENTINO alleges that defendants then used suspension, false disciplinary framing, disabled Department access, training exclusion, manufactured rule violations, Risk Management termination-track processing, and forced-resignation pressure to remove her from the Academy pipeline. The same Department that failed to protect her from coordinated threats and physical injury treated her safety complaints, injury report, and protected opposition as reasons to discipline, isolate, and force her out.

This action asserts claims under the New York State Human Rights Law and the New York City Human Rights Law for discrimination, hostile work environment, retaliation, aiding and abetting, interference, discriminatory discipline, training exclusion, and forced resignation. FLORENTINO seeks compensatory damages, punitive damages where available, attorneys' fees, costs, interest, equitable relief, and correction, removal, or expungement of discriminatory, retaliatory, inaccurate, or contaminated NYPD employment, Academy, disciplinary, Risk Management, and resignation records.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to Article VI of the New York State Constitution, the New York State Human Rights Law, Executive Law § 290 et seq., the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq., and the common law of the State of New York.

2. This Court has personal jurisdiction over defendants THE CITY OF NEW YORK, JESSICA S. TISCH, MARTINE N. MATERASSO, CHRIS D. MORELLO, JOSE L. CARABALLO, ALBERTO GONZALEZ, JOHN J. SEMINERIO, NATALIE L. BARNES, OLIVIA SICILIANO, YADIRIS A. TAVERAS, MATTHEW S. MISENER, ABEL GUERRERO-CEDENO, ASTRID A. ORTIZ, ANYSSACHEYENNE A. BIGGS, JADAMIL SANCHEZ, CIELO P. COLON, and MERAJ A. CHAUDARY pursuant to CPLR §§ 301 and 302 because defendants reside in, are domiciled in, are employed in, conduct business in, exercise official authority in, and/or committed acts or omissions complained of within the State of New York.

3. Venue is designated in Bronx County pursuant to CPLR § 504(3) because defendant THE CITY OF NEW YORK is a party to this action, the events complained of

occurred within the City of New York, and plaintiff designates Bronx County as the place of trial.

4. Venue is also proper pursuant to CPLR § 503(a) because, upon information and belief, one or more defendants resides in Bronx County, works in Bronx County, conducts Department business in Bronx County, is assigned to duties connected to Bronx County, or has material employment, training, operational, supervisory, or disciplinary ties to Bronx County.

5. Venue is further proper because material events, effects, training assignments, Department operations, employment consequences, and damages connected to this action occurred in, were directed from, were connected to, or were felt in Bronx County.

6. Venue is also proper because the events complained of occurred within the City of New York, including Queens County, Bronx County, and New York County.

7. The principal Academy-based workplace events occurred in Queens County, including the hostile work environment, coordinated threats, property damage, retaliation, disciplinary escalation, training exclusion, modified-duty treatment, and forced-resignation sequence at the NYPD Police Academy.

8. Material personnel, disciplinary, Risk Management, Police Commissioner, Department Advocate, Training Bureau, and related NYPD operations involving defendant JESSICA S. TISCH, defendant MARTINE N. MATERASSO, and other Department decisionmakers occurred in, were directed from, or were connected to New York County.

9. Venue is additionally proper pursuant to CPLR § 509 because Bronx County is a proper county selected by plaintiff, defendant THE CITY OF NEW YORK is a party, the complained-of events occurred within the City of New York, and defendants are subject to the jurisdiction of this Court.

PROCEDURAL REQUIREMENTS

10. Plaintiff SLIMS FLORENTINO has satisfied all conditions precedent to the commencement of this action, or such conditions have been waived, excused, satisfied by defendants' conduct, or are not required.

11. No notice of claim is required for plaintiff's claims brought pursuant to the New York State Human Rights Law, Executive Law § 290 et seq., or the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq.

12. Plaintiff's claims arise from defendants' discriminatory, hostile, retaliatory, and interfering employment practices, including conduct occurring during plaintiff's NYPD hiring process, Police Academy training, suspension, modified-duty return, disabled Department access, training exclusion, disciplinary processing, Risk Management termination-track review, and forced-resignation sequence.

13. Plaintiff has not elected an administrative remedy that would bar this action.

14. Plaintiff's claims are timely under the applicable statutes of limitation.

15. To the extent defendants contend that any additional procedural requirement applies, such requirement has been satisfied, waived, excused, rendered unnecessary, or is inapplicable based upon the nature of the claims asserted herein and defendants' own conduct.

PLAINTIFF

16. Plaintiff SLIMS FLORENTINO is a resident of Queens County, New York.

17. Plaintiff is a woman who self-identifies as Dominican.

18. At all relevant times, plaintiff was a candidate for employment and then a probationary police officer recruit employed by defendant THE CITY OF NEW YORK through the New York City Police Department.

19. On or about December 17, 2025, plaintiff took the oath to become a New York City Police Officer and was assigned to the NYPD Police Academy in Queens County.

20. Plaintiff successfully completed multiple required Academy components, including the 1.5-mile run, the Job Standard Test, firearms qualification, and written examinations.

21. Plaintiff was qualified to continue recruit training and attempted to complete the Police Academy.

22. Plaintiff became the victim, complainant, reporting recruit, injured recruit, witness, and protected-activity source in the matters alleged herein.

23. Plaintiff brings this action to redress sexual harassment, sex-based hostile work environment, retaliation, aiding and abetting, interference, discriminatory discipline, training exclusion, disabled Department access, forced-resignation pressure, and related damages under the NYSHRL and NYCHRL.

DEFENDANTS

24. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York. At all relevant times, THE CITY OF NEW YORK operated, controlled, supervised, and was legally responsible for the New York City Police Department, including the NYPD Police Academy, Training Bureau, recruit operations, recruit discipline, Risk Management, Department Advocate's Office, resignation processing, personnel records, and the employment practices challenged herein.

25. Defendant JESSICA S. TISCH is the Police Commissioner of the City of New York and is sued individually and in her official capacity. At all relevant times, TISCH possessed final authority over NYPD discipline, probationary employment, recruit termination,

Risk Management termination approval, Department records, corrective action, and the policies, practices, customs, and decisions challenged herein.

26. Defendant MARTINE N. MATERASSO is the NYPD Chief of Training and is sued individually and in her official capacity. At all relevant times, MATERASSO exercised command authority over the Training Bureau, the NYPD Police Academy, recruit training, Academy supervision, recruit discipline, recruit progression, recruit investigations, and the training pipeline challenged herein.

27. Plaintiff alleges that defendants THE CITY OF NEW YORK, TISCH, MATERASSO, and CHRIS D. MORELLO created, tolerated, ratified, or failed to correct an Academy environment in which sexualized hostility, gendered intimidation, race, ethnicity, and national-origin hostility, retaliatory discipline, evidence destruction, selective enforcement, training exclusion, false domestic-violence framing, and forced-resignation pressure were permitted to occur.

28. Defendant CHRIS D. MORELLO was, at all relevant times, an NYPD command-level official assigned to or exercising authority over the NYPD Police Academy and is sued individually and in his official capacity. MORELLO exercised command authority over Academy operations and recruit discipline; disbanded recruit company 25-95; suspended COLON; later signed Charges and Specifications against FLORENTINO; and had prior notice issues relevant to gender-sensitive, victim-status-sensitive, conflict-aware, evidence-preserving, and non-retaliatory handling of misconduct complaints.

29. Defendant JOSE L. CARABALLO was, at all relevant times, an NYPD lieutenant, Academy supervisory actor, command actor, or recruit-training official and is sued individually and in his official capacity. CARABALLO is named because he was placed on

notice of the planned locker-room assault, group-chat evidence, property damage, gendered hostility, evidence-destruction concerns, and unsafe Academy conditions; confirmed plaintiff's vest-unit reporting issue; participated in the June 11, 2026 resignation-related interaction; and had prior notice as a previously sued Academy actor in the pending Emilio Andino matter involving Academy discipline, recruit treatment, and training-pipeline failures.

30. Defendant ALBERTO GONZALEZ is an NYPD captain, Academy supervisory official, or command actor and is sued individually and in his official capacity. GONZALEZ is named because he participated in the March 27–28, 2026 disciplinary and IAB response, informed FLORENTINO that witness statements did not match, suspended FLORENTINO and GUERRERO-CEDENO, and participated in stripping FLORENTINO of Department access and Academy status after she was struck and injured.

31. Defendant JOHN J. SEMINERIO is an NYPD lieutenant, Academy supervisory official, or command actor and is sued individually and in his official capacity. SEMINERIO is named because he participated in the March 27, 2026 response to the GUERRERO-CEDENO incident, sexualized the strike by suggesting that it may have been a “bad method of flirting” or related to rejected lunch, minimized plaintiff's injury, and participated in the false domestic-violence framing of the incident.

32. Defendant NATALIE L. BARNES is an NYPD sergeant assigned to the NYPD Police Academy, Recruit Operations, or recruit-training administration and is sued individually and in her official capacity. BARNES is named because she participated in post-suspension retaliation, addressed FLORENTINO as “Slims,” made derogatory remarks concerning immigrants and non-English-speaking recruits, accused FLORENTINO of “perjury” in a logbook, shook her badge in plaintiff's face, obstructed training information, participated in

manufactured discipline, and treated plaintiff less favorably during modified-duty and training-exclusion periods.

33. Defendant OLIVIA SICILIANO is an NYPD sergeant assigned to the NYPD Police Academy, Recruit Operations, or recruit-training administration and is sued individually and in her official capacity. SICILIANO is named because she participated in the February 26, 2026 intimidation with Marshall, participated in the March 27, 2026 sexualized and disciplinary response to the GUERRERO-CEDENO incident, took photographs of plaintiff's injury on her personal phone, participated in the suspension process, threatened plaintiff concerning the vest-safety issue, and participated in the May 12, 2026 "perjury" and unauthorized-tour-change accusations.

34. Defendant YADIRIS A. TAVERAS is an NYPD police officer, Academy instructor, officer in charge, or recruit-company supervisory actor and is sued individually and in her official capacity. TAVERAS is named because she minimized gendered hostility, received plaintiff's report of property damage and a planned locker-room assault, failed to ensure a protective and evidence-preserving response, and allegedly instructed recruits to "delete," "unsend," and "make it look like it didn't happen," thereby supporting plaintiff's evidence-tampering, spoliation, concealment, aiding-and-abetting, and interference allegations.

35. Defendant MATTHEW S. MISENER is an NYPD police officer, PBA delegate, Academy actor, or Department representative and is sued individually and in his official capacity. MISENER is named because he participated in the Department's response when FLORENTINO reported the planned locker-room assault; had notice that plaintiff sought protection from coordinated recruit violence; participated in the GUERRERO-CEDENO/IAB/suspension process; walked FLORENTINO out after suspension; sent reporting

instructions; and later provided information concerning drivers training. Plaintiff alleges that MISENER had notice, participated in the challenged events, failed to protect plaintiff, and aided, abetted, or interfered with plaintiff's protected rights.

36. Defendant ABEL GUERRERO-CEDENO was, at all relevant times, an NYPD probationary police officer recruit assigned to the NYPD Police Academy and is sued individually and in his official capacity. GUERRERO-CEDENO is named because he struck FLORENTINO from behind with a duffle bag, caused injury, triggered the Department's sexualized and false domestic-violence framing, and became part of the disciplinary sequence that led to plaintiff's suspension, charges, termination-track processing, and forced resignation.

37. Defendant ASTRID A. ORTIZ was, at all relevant times, an NYPD probationary police officer recruit assigned to the NYPD Police Academy and is sued individually and in her official capacity. ORTIZ is named because plaintiff alleges that she participated in isolating plaintiff, restroom surveillance, coordinated hostility, and the planned locker-room assault.

38. Defendant ANYSSACHEYENNE A. BIGGS was, at all relevant times, an NYPD probationary police officer recruit assigned to the NYPD Police Academy and is sued individually and in her official capacity. BIGGS is named because plaintiff alleges that she confronted plaintiff in the cafeteria, made a derogatory Hispanic/Spanish comment, participated in isolating plaintiff, and participated in the planned locker-room assault.

39. Defendant JADAMIL SANCHEZ was, at all relevant times, an NYPD probationary police officer recruit assigned to the NYPD Police Academy and is sued individually and in her official capacity. SANCHEZ is named because plaintiff alleges that she told plaintiff to "learn your place," participated in clique-based hostility, and participated in the planned locker-room assault.

40. Defendant CIELO P. COLON was, at all relevant times, an NYPD probationary police officer recruit assigned to the NYPD Police Academy and is sued individually and in her official capacity. COLON is named because plaintiff alleges that she used gendered insults including “bitch,” kicked plaintiff’s bag, damaged plaintiff’s personal and Department property, participated in the planned locker-room assault, and was suspended after the command-level response to plaintiff’s report.

41. Defendant MERAJ A. CHAUDARY was, at all relevant times, an NYPD Police Academy instructor, Academy actor, Department member, and/or officer in charge of recruit company 25-100, and is sued individually and in his official capacity. CHAUDARY is named because plaintiff alleges that, while operating within the Police Academy environment and exercising Academy authority, he photographed FLORENTINO without a legitimate work-related purpose, circulated or caused the circulation of her image to other members of the service, made gendered and appearance-based comments concerning her, spread a retaliatory narrative about her, and later sent or caused the circulation of a Department-wide communication stating that instructors were excited plaintiff had been suspended.

42. At all relevant times, the individual defendants acted under color of their NYPD employment, rank, assignment, recruit status, supervisory authority, Academy authority, command authority, disciplinary authority, apparent Department authority, or participation in NYPD-controlled employment and training processes.

43. At all relevant times, defendant THE CITY OF NEW YORK knew or should have known of the conduct alleged herein through its supervisors, commanders, instructors, recruit operations personnel, Academy personnel, Training Bureau personnel, Risk Management personnel, disciplinary personnel, and other agents.

44. Plaintiff alleges that each individual defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, ratified, or failed to correct discriminatory, hostile, retaliatory, interfering, or otherwise unlawful conduct in violation of the NYSHRL and NYCHRL.

BACKGROUND

A. The The NYPD Hiring and Screening Process Was Unvalidated, Discriminatorily Administered, and Professionally Defective

45. This case arises from plaintiff SLIMS FLORENTINO'S experience as a probationary police officer recruit assigned to the NYPD Police Academy in Queens County.

46. FLORENTINO entered the NYPD hiring process after taking and passing NYPD examination number 5333.

47. After passing examination number 5333, FLORENTINO proceeded through the Candidate Assessment Division process, medical screening, psychological screening, investigator review, pre-appointment processing, and Police Academy orientation.

48. FLORENTINO appeared for NYPD medical screening, provided the required fingerprinting fee, and underwent required pre-appointment screening components, including vision, hearing, EKG, and blood-pressure screening.

49. FLORENTINO was assigned an NYPD investigator and proceeded through the investigator-review portion of the hiring process.

50. FLORENTINO was also subjected to the NYPD's psychological screening process.

51. Although FLORENTINO passed the psychological screening and was deemed psychologically fit, plaintiff alleges that the screening process itself was unlawful, unvalidated, biased, and professionally deficient.

52. Plaintiff alleges, that the NYPD psychological screening process fails to comply with the Uniform Guidelines on Employee Selection Procedures because it is not properly validated as job-related, consistent with business necessity, or predictive of the actual knowledge, skills, abilities, temperament, or qualifications necessary to perform the duties of a New York City Police Officer.

53. Plaintiff further alleges, that the NYPD psychological screening process permits subjective, stereotype-driven, gendered, culturally biased, and arbitrary judgments to influence candidate outcomes.

54. Plaintiff further alleges, upon information and belief, that the NYPD used unqualified, unlicensed, or improperly credentialed psychological personnel who held themselves out as medically or professionally qualified to make psychological, clinical, or employment-fitness assessments, in violation of the New York Education Law and related professional-licensing requirements.

55. FLORENTINO'S own psychological interview reflected those defects.

56. During her virtual psychological interview, a male psychological evaluator focused almost entirely on FLORENTINO'S former boyfriend and questioned why she ended a seven-year relationship.

57. When FLORENTINO explained that she and her former boyfriend were no longer aligned, that their interests had changed, and that she did not see a point in holding onto someone merely to say she had someone, the evaluator did not accept her answer.

58. The evaluator asked FLORENTINO whether she had commitment issues.

59. The evaluator emphasized that he had the ability to determine whether FLORENTINO would be hired.

60. The interview lasted approximately thirty minutes and focused almost entirely on FLORENTINO'S former romantic relationship.

61. FLORENTINO alleges that those inquiries had nothing to do with determining whether she was suitable, qualified, or fit to serve as a police recruit or New York City Police Officer.

62. FLORENTINO further alleges that the questioning was gendered, intrusive, unprofessional, unrelated to any validated police-officer selection standard, and reflective of the NYPD's broader flawed psychological-screening architecture.

63. FLORENTINO later received notice that she had been deemed psychologically fit.

64. Defendant THE CITY OF NEW YORK and defendant JESSICA S. TISCH were on notice, including from prior civil litigation and challenges involving NYPD candidate screening practices, that the Department's psychological screening process was fundamentally flawed, infected by bias, and vulnerable to arbitrary and discriminatory administration.

65. Plaintiff alleges, that the NYPD's psychological screening process has been used as a gatekeeping mechanism against police-officer candidates and recruits without adequate validation under the Uniform Guidelines on Employee Selection Procedures.

66. Plaintiff further alleges, that the NYPD's psychological screening process does not reliably measure the actual knowledge, skills, abilities, temperament, or job-related qualifications necessary to perform the duties of a New York City Police Officer.

67. Plaintiff further alleges, that the process allows subjective, biased, gendered, culturally loaded, and stereotype-based judgments to influence candidate and recruit outcomes.

68. Plaintiff further alleges, that the NYPD has utilized unlicensed psychologists and/or psychological personnel who were not legally authorized to hold themselves out as medically qualified to make clinical, psychological, or employment-fitness assessments, in violation of the New York Education Law and related professional-licensing requirements.

69. Plaintiff further alleges, that the use of unlicensed or improperly credentialed psychological personnel rendered the process unlawful, unreliable, and incapable of satisfying the job-relatedness and business-necessity requirements applicable to employment-selection procedures.

B. The Police Academy Command Structure and Prior Notice of Training-Pipeline Failures

70. The NYPD Police Academy is not an ordinary workplace.

71. It is a paramilitary training environment where recruits are subject to command authority, instructor control, company assignments, training schedules, disciplinary rules, equipment control, communications access, performance requirements, and the constant risk that alleged misconduct can end a probationary police career before it begins.

72. Defendant MARTINE N. MATERASSO was the NYPD Chief of Training.

73. As Chief of Training, MATERASSO exercised command authority over the Training Bureau, the NYPD Police Academy, recruit training, Academy supervision, Academy discipline, recruit investigations, recruit qualification decisions, and the training pipeline challenged herein.

74. Defendant CHRIS D. MORELLO exercised command authority over the Police Academy and the recruit-training environment.

75. MORELLO and other Academy personnel were direct or indirect subordinates within the Training Bureau chain of command under MATERASSO.

76. Defendants ALBERTO GONZALEZ, JOHN J. SEMINERIO, NATALIE L. BARNES, OLIVIA SICILIANO, and YADIRIS A. TAVERAS were supervisory, instructional, command, recruit operations, or company-level actors who participated in, responded to, or failed to correct the events alleged herein.

77. Defendant JESSICA S. TISCH, as Police Commissioner, possessed final authority over Department discipline, probationary employment, training governance, termination-track review, employment records, and corrective action.

78. Defendant THE CITY OF NEW YORK and defendant TISCH were already on notice, including from pending and prior litigation, complaints, public reporting, and law-enforcement proceedings, that the NYPD's candidate-screening, recruit-training, Academy-supervision, and probationary-discipline systems were vulnerable to arbitrary decision-making, discriminatory administration, retaliatory enforcement, inadequate investigation, selective discipline, command-level ratification, and obstruction of Academy progression.

79. That notice includes the pending Emilio Andino matter, a Supreme Court, New York County action alleging that a Black male NYPD Police Academy recruit was subjected to retaliation, race discrimination, hostile work environment, biased Academy discipline, coercive RIAH hair testing, and career obstruction after he was targeted because of his familial association with retired NYPD Lieutenant Quatisha Epps, a whistleblower who had publicly accused former Chief of Department Jeffrey B. Maddrey of quid pro quo sexual harassment and exposed misconduct within NYPD executive ranks.

80. In the Andino matter, the plaintiff alleges that fellow recruit Bahron Asliev instigated a racially and sexually charged incident; that Academy officials failed to discipline Asliev; that NYPD officials instead suspended Andino without pay; that exculpatory witnesses

were ignored; that a disciplinary charge was drafted through Academy command channels; that Andino was subjected to RIAH hair testing despite the test's disputed reliability and disparate impact; and that, even after scoring 93 on the third and final trimester examination and allegedly satisfying graduation requirements, he remained stalled in the NYPD training pipeline.

81. Plaintiff alleges, upon information and belief, that defendant MATERASSO'S role as Chief of Training is material to that notice because the Andino matter specifically names MATERASSO as Chief of Training and alleges that she exercised command authority over the Police Academy, recruit discipline, recruit investigations, suspension decisions, disciplinary processing, recruit qualification decisions, and progression through the training pipeline.

82. Plaintiff further alleges, upon information and belief, that the Andino matter placed defendant THE CITY OF NEW YORK, defendant TISCH, and defendant MATERASSO on notice that the Police Academy's recruit discipline and training-pipeline systems could be used to protect favored recruits, punish protected or disfavored recruits, ignore exculpatory evidence, impose disputed hair testing, and obstruct Academy progression despite successful academic performance.

83. That notice also includes the Shatorra Foster matter, a Supreme Court, Bronx County action alleging that defendant MORELLO, then a Deputy Chief and Executive Officer within the Internal Affairs Bureau, personally concurred in the issuance of Charges and Specifications against a female member of the service after the Department allegedly possessed information showing that the complainant-source, TREVLYN O. HEADLEY, was not neutral but was herself a subject officer whose alleged sexual grooming, sexual coercion, sexual assault, retaliation, Department-resource misuse, computer misuse, demotion, credibility, motive, and treatment of women were central to any fair investigation.

84. Plaintiff alleges, upon information and belief, that MORELLO'S role in the Foster matter is material because it placed defendant THE CITY OF NEW YORK, defendant TISCH, and defendant MORELLO on notice that NYPD command officials must use gender-sensitive, victim-status-sensitive, conflict-aware, evidence-preserving, and non-retaliatory procedures when a female member of the service reports sexual misconduct, coercive conduct, retaliation, abuse of authority, Department-resource misuse, or unsafe conditions. FLORENTINO similarly alleges that MORELLO failed to ensure such a response after receiving actual notice that she, a female recruit, had reported coordinated threats, group-chat evidence, property damage, and unsafe Academy conditions.

85. The risks created by defective screening, training, supervision, discipline, and integrity controls were not theoretical.

86. On or about March 10, 2026, the United States Attorney's Office for the Eastern District of New York announced a federal indictment charging two former NYPD officers, Justin McMillan and Justin Colon¹, with federal civil-rights violations arising from alleged on-duty misconduct in the 115th Precinct in Queens.

¹ Plaintiff further alleges, upon information and belief, that the Justin Colon matter is independently relevant to notice, foreseeability, and the Department's training-pipeline failures.

Before the March 10, 2026 federal indictment involving former NYPD officers Justin McMillan and Justin Colon, Colon had allegedly served as an NYPD cadet assigned to the Chief of Department's Office, where he committed crimes by unlawfully accessing NYPD law-enforcement databases for his own personal gain.

Plaintiff alleges, upon information and belief, that those crimes were concealed, minimized, covered up, or otherwise not meaningfully prosecuted or disciplined under then-Deputy Commissioner of Operations Kaz Daughtry and other Department actors, and that Colon was nevertheless permitted to pass through the Police Academy and become a police officer.

87. According to the public announcement, the indictment alleged that the former officers responded to a 311 prostitution-related complaint, turned off their body-worn cameras, stole a key, returned hours later, entered the location, stole money, and that one officer groped a naked woman.

88. The public announcement further stated that defendant TISCH, as Police Commissioner, declared that the NYPD had “zero tolerance for misconduct of any kind,” that officers who violate their oath would be “investigated, exposed, and held fully accountable,” and that the standard “will never change.”

89. Plaintiff alleges that these public facts are material because they show that defendant THE CITY OF NEW YORK and defendant TISCH were aware that failures in screening, training, supervision, discipline, integrity controls, and accountability systems can allow dangerous, abusive, discriminatory, retaliatory, sexually predatory, or integrity-compromised officers to pass through the NYPD pipeline and later harm vulnerable members of the public.

90. Plaintiff further alleges that the same institutional risk existed inside the Police Academy itself, where FLORENTINO reported coordinated threats, group-chat evidence, hostile conduct, property damage, and a planned locker-room assault by fellow recruits, yet the Academy response failed to preserve evidence, failed to protect plaintiff from retaliation, and failed to correct the hostile recruit environment.

Plaintiff alleges that Colon’s later alleged abuse of a vulnerable woman while on duty was foreseeable because his earlier criminal misuse of confidential NYPD law-enforcement databases already demonstrated integrity failure, abuse of privileged Department access, and willingness to misuse NYPD authority for personal purposes.

91. Plaintiff alleges that defendants' treatment of her reflects the same broader Department failure: the NYPD's use of flawed screening tools, subjective judgments, arbitrary discretion, inadequate training supervision, selective discipline, retaliatory command practices, and command-level ratification while allowing favored, dangerous, or more protected recruits to remain protected, advanced, or more favorably treated.

92. Plaintiff further alleges that defendant THE CITY OF NEW YORK, defendant TISCH, defendant MATERASSO, and defendant MORELLO cannot plausibly claim lack of notice that the NYPD training and screening pipeline required careful oversight, lawful validation, meaningful supervision, gender-sensitive investigation, evidence preservation, neutral discipline, and prompt correction when recruits or officers demonstrate violent, discriminatory, retaliatory, sexually abusive, or integrity-compromising conduct.

93. Plaintiff alleges that this command and notice background is relevant to the Department's failure to protect her, failure to preserve evidence, failure to correct the hostile Academy environment, false domestic-violence framing, retaliatory discipline, training exclusion, Risk Management termination-track processing, and forced-resignation pressure.

C. The Unauthorized 1.5-Mile Run and Plaintiff's Successful Academy Performance

94. Plaintiff's Academy performance must be understood against the Department's continued use of unauthorized and unvalidated physical-fitness practices.

95. Defendant THE CITY OF NEW YORK and defendant JESSICA S. TISCH were already on notice that the NYPD's continued use of the 1.5-mile run as a recruit-training, assessment, conditioning, or separation device was unauthorized, unvalidated, and legally displaced by the Job Standard Test.

96. That notice included counsel's December 17, 2025 demand for immediate reinstatement of former NYPD recruits who had allegedly been constructively discharged after failing the unauthorized 1.5-mile run.

97. The December 17, 2025 demands advised defendant TISCH that the Department's only approved physical-fitness standard was the Job Standard Test, a validated measure formally adopted pursuant to the Professional Policing Act of 2021, Executive Law §§ 839 and 840, 9 N.Y.C.R.R. Part 6000, and DCJS/MPTC authority.

98. The December 17, 2025 demands further advised defendant TISCH that, once the JST was approved, the 1.5-mile run lost legal effect and could not lawfully be used formally, informally, or under the guise of conditioning to separate, pressure, discipline, humiliate, or otherwise disadvantage recruits.

99. The December 17, 2025 demands further advised defendant TISCH that continued use of the 1.5-mile run lacked statutory authorization, lacked scientific validation, failed to comply with the Uniform Guidelines on Employee Selection Procedures, and predictably produced disparate impact against women, Black candidates, and Hispanic candidates.

100. Plaintiff alleges that defendant THE CITY OF NEW YORK and defendant TISCH therefore knew, before plaintiff entered the Academy and before the events alleged herein escalated, that the Department's physical-fitness and training practices required lawful validation, DCJS approval, neutral administration, and non-retaliatory enforcement.

101. Despite that notice, FLORENTINO was still subjected to the 1.5-mile run during the Academy process.

102. FLORENTINO does not allege that she failed the 1.5-mile run.

103. To the contrary, FLORENTINO completed the 1.5-mile run on or about January 9, 2026, on her first attempt.

104. FLORENTINO also completed the Job Standard Test on or about January 12, 2026, on her first attempt.

105. FLORENTINO alleges that passing the unauthorized 1.5-mile run did not cure the Department's unlawful use of that unvalidated and displaced testing practice.

106. FLORENTINO further alleges that being subjected to the unauthorized 1.5-mile run is relevant because it forms part of the same broader NYPD screening, training, and recruit-control architecture challenged herein.

107. FLORENTINO successfully completed multiple additional Academy requirements.

108. On or about January 30, 2026, FLORENTINO completed the first trimester examination.

109. On or about March 17, 2026, FLORENTINO passed the Police Qualification Course and qualified with her firearm.

110. On or about May 4, 2026, after returning from suspension, FLORENTINO passed the second trimester examination with a score of 97.

111. FLORENTINO alleges that her successful performance on the run, the JST, firearms qualification, and written examinations confirms that performance was not the problem.

112. FLORENTINO alleges that the problem was the hostile, sexualized, racially and ethnically derogatory, unsafe, and retaliatory Academy environment she entered, and the Department's response after she reported misconduct.

113. FLORENTINO further alleges that defendants used subjective judgments, arbitrary discretion, disabled communications access, training exclusion, disciplinary pressure, and termination-track processing against her despite her successful completion of multiple Academy performance requirements.

114. FLORENTINO alleges that this contrast is material: the Department subjected her to unauthorized or unvalidated screening and training practices when it suited the Department's recruit-control interests, but later disregarded her successful performance when it chose to treat her as a disciplinary and termination-track problem.

D. The Sexualized Recruit Environment, Differential Favoritism, and Plaintiff's Successful Academy Performance

115. FLORENTINO entered the Police Academy qualified, motivated, and prepared to complete recruit training.

116. On or about December 17, 2025, FLORENTINO took the oath to become a New York City Police Officer.

117. From on or about December 17, 2025 through December 19, 2025, FLORENTINO attended orientation at the NYPD Police Academy.

118. On or about December 19, 2025, FLORENTINO was assigned to recruit company 25-95.

119. On or about December 22, 2025, FLORENTINO began Academy classes.

120. On or about January 9, 2026, FLORENTINO completed the 1.5-mile run on her first attempt.

121. On or about January 12, 2026, FLORENTINO completed the Job Standard Test on her first attempt.

122. On or about January 30, 2026, FLORENTINO completed the first trimester examination.
123. On or about February 2, 2026, TAVERAS congratulated FLORENTINO and another recruit for achieving the highest scores on the examination.
124. On or about March 17, 2026, FLORENTINO passed the Police Qualification Course and qualified with her firearm.
125. On or about May 4, 2026, after returning from suspension, FLORENTINO passed the second trimester examination with a score of 97.
126. FLORENTINO alleges that her Academy performance confirms that she was qualified, capable, and progressing through recruit training.
127. FLORENTINO further alleges that defendants' later hostile, discriminatory, retaliatory, disciplinary, training-exclusion, and forced-resignation conduct did not arise from any failure to perform required Academy work.
128. FLORENTINO alleges that the Academy environment was also infected with sexualized recruit conduct, differential favoritism, and selective enforcement.
129. After FLORENTINO was moved into company 25-103, she observed that certain recruits appeared to be engaged in inappropriate sexual or intimate relationships with one another.
130. FLORENTINO observed that male recruits initially spoke to her.
131. When female recruits noticed, they made comments such as "your new girlfriend on the block Florentino so you don't need us" and "Abel, I'm divorcing you."
132. FLORENTINO alleges that ordinary interactions with male recruits were sexualized, resented, and weaponized against her.

133. FLORENTINO alleges that the sexualized recruit environment contributed to the gendered hostility directed at her.

134. FLORENTINO also observed differential favoritism in the Academy environment.

135. During range training, FLORENTINO observed that a recruit who had difficulty firing and loading his firearm flagged FLORENTINO and another recruit multiple times without receiving a safety violation.

136. On or about March 17, 2026, FLORENTINO passed the Police Qualification Course.

137. That same day, several other recruits, including Recruits Bianca Rodriguez, Jannah A. Martin, Nicolette M. Tripoli, and Steph, did not pass.

138. FLORENTINO alleges that those same recruits had also not passed the run, the Job Standard Test, and the range.

139. FLORENTINO alleges that, after she passed and they did not, their negative attitudes toward her increased.

140. On or about May 4, 2026, after FLORENTINO returned from suspension, she observed instructors helping recruits who were struggling with the second trimester examination by allowing or encouraging them to change answers.

141. FLORENTINO passed that examination with a 97.

142. FLORENTINO alleges that this favorable assistance to failing recruits is material because Academy personnel exercised discretion to benefit certain recruits while later using rigid, punitive, and technical rules against her.

E. Gendered, Sexualized, Race, Ethnicity, and National-Origin Hostility

143. FLORENTINO alleges that the hostility she experienced was not ordinary recruit conflict.

144. It included gendered hostility, sexualized assumptions, race and national-origin-based comments, isolation, restroom surveillance, property damage, coordinated threats, and retaliation after she reported misconduct.

145. In January 2026, FLORENTINO observed a recruit clique that included ORTIZ, SANCHEZ, COLON, DANIELS, DIAMOND, and others.

146. FLORENTINO alleges that members of this clique yelled, mocked one another, disrupted class, and escalated their behavior when instructors were not present.

147. After another recruit reported the conduct to TAVERAS and TAVERAS addressed the class, members of the clique began calling FLORENTINO a “snitch.”

148. FLORENTINO alleges that the “snitch” label was used against her in unison.

149. BIGGS later confronted FLORENTINO in the cafeteria and accused her of talking about BIGGS.

150. FLORENTINO alleges that BIGGS, ORTIZ, and others worked to isolate her by discouraging other recruits from speaking with her.

151. FLORENTINO alleges that ORTIZ repeatedly followed her to the restroom even when ORTIZ had already gone.

152. ORTIZ allegedly stood in stalls next to FLORENTINO without using the restroom.

153. ORTIZ allegedly returned to class and falsely claimed that FLORENTINO had been in the restroom talking about BIGGS.

154. FLORENTINO alleges that the restroom conduct became so uncomfortable that she waited until no bathroom breaks were occurring before using the restroom.

155. On or about February 9, 2026, TAVERAS told FLORENTINO that policing is a “male dominate field.”

156. TAVERAS further told FLORENTINO those recruits needed one another and needed to get along because the Academy was only six months.

157. On or about February 10, 2026, SANCHEZ told FLORENTINO that she needed to learn not to tell anyone to “lock it up.”

158. SANCHEZ further told FLORENTINO that it was not her place to tell anyone to do pushups or sit-ups, even if an instructor had directed the recruits to do them.

159. SANCHEZ told FLORENTINO to “learn your place” if she wanted to be there.

160. FLORENTINO alleges that, in the Academy context, SANCHEZ’S statement reflected intimidation, gendered subordination, and an effort to silence her.

161. On or about February 13, 2026, BIGGS cut the cafeteria line with other recruits while FLORENTINO was waiting to order food.

162. BIGGS stated to the cook, in substance, that the cook was only giving FLORENTINO a burger because FLORENTINO was Hispanic and the cook was Spanish.

163. FLORENTINO, who self-identifies as Dominican, alleges that BIGGS’ statement was racially, ethnically, and national-origin derogatory.

F. Property Damage, Group-Chat Threats, Evidence Tampering, and the Planned Locker-Room Assault

164. On or about February 17, 2026, COLON confronted FLORENTINO in the auditorium after FLORENTINO sat in what COLON claimed was her seat.

165. COLON allegedly told FLORENTINO, “what the fuck are you doing in my seat Florentino. Get the fuck up.”

166. COLON allegedly referred to FLORENTINO as a “fucking bitch.”

167. COLON later allegedly called FLORENTINO a “dumbass bitch.”

168. COLON allegedly asked FLORENTINO, “you got something to say bitch?”

169. COLON then allegedly kicked FLORENTINO’S bag.

170. COLON’S conduct damaged FLORENTINO’S personal cellular telephone and the screen protector on FLORENTINO’S Department phone.

171. FLORENTINO reported COLON’S conduct.

172. TAVERAS spoke separately to FLORENTINO and COLON.

173. TAVERAS told FLORENTINO that policing was a predominantly male field and that women were supposed to stick together rather than be against one another.

174. TAVERAS told FLORENTINO to keep pushing through and ignore the conduct because it was only six months in the Academy.

175. FLORENTINO alleges that TAVERAS minimized gendered hostility, property damage, and escalating physical intimidation rather than treating the incident as a warning sign of coordinated recruit misconduct.

176. On or about February 18, 2026, Recruit Kason Brabham called FLORENTINO at approximately 1:30 a.m.

177. Brabham told FLORENTINO that ORTIZ, BIGGS, COLON, and SANCHEZ planned to attack her at approximately 1900 hours in the locker room.

178. Brabham told FLORENTINO that he wanted to warn her because he cared about her and did not want them to hurt her when she was alone.

179. Brabham told FLORENTINO that the locker room was selected because no one went into the locker room and no one inspected recruit bags.

180. Brabham told FLORENTINO that he heard the plan discussed in the auditorium and in a group chat that excluded FLORENTINO.

181. FLORENTINO alleges that the planned locker-room attack was not ordinary recruit conflict.

182. FLORENTINO alleges that ORTIZ, BIGGS, COLON, and SANCHEZ were planning a coordinated gang-style assault against her in an isolated female locker-room setting where they believed she would be vulnerable, alone, and without immediate supervision.

183. FLORENTINO further alleges that the existence of a group chat concerning the planned attack made the misconduct premeditated, coordinated, electronically documented, and capable of preservation.

184. FLORENTINO reported the planned locker-room assault to TAVERAS.

185. FLORENTINO told TAVERAS that she wanted the recruits to leave her alone and not hurt her.

186. FLORENTINO stated that the locker-room environment was frightening because no one walked in and out like in the men's locker room.

187. FLORENTINO further stated that the mentality in the Academy was like "perp mentality."

188. FLORENTINO'S report placed the NYPD, the Police Academy, and the Training Bureau on actual notice that plaintiff was reporting a planned coordinated assault, not a personality dispute.

189. FLORENTINO'S report also placed defendants on actual notice that relevant electronic evidence existed, including group-chat communications concerning the planned attack.

190. When TAVERAS returned to class, TAVERAS allegedly told the company that she did not know what group chats or evidence they had, but to "delete it," "unsend it," and "make it look like it didn't happen."

191. FLORENTINO alleges that TAVERAS' instruction constituted evidence tampering, spoliation, concealment, and interference with a workplace-safety and discrimination-related investigation.

192. FLORENTINO further alleges that TAVERAS' instruction protected the recruits accused of planning the assault and impaired plaintiff's ability to prove the planned attack, group-chat coordination, motive, participants, and retaliatory hostility.

193. The matter was brought to the attention of MORELLO, defendant JOSE L. CARABALLO, defendant MATTHEW S. MISENER, and the Training ICO.

194. Defendant CARABALLO was already a known Police Academy supervisory actor and had been sued in the pending Emilio Andino matter concerning alleged Academy discipline, recruit treatment, and training-pipeline failures.

195. FLORENTINO alleges that CARABALLO'S involvement is material because he was placed on notice that a female recruit had reported a planned locker-room assault, group-chat evidence, property damage, gendered hostility, and evidence destruction, yet the Department failed to ensure a complete, neutral, evidence-preserving, and non-retaliatory response.

196. Defendant MISENER was also placed on notice of the planned locker-room assault and plaintiff's stated fear that ORTIZ, BIGGS, COLON, and SANCHEZ would hurt her.

197. FLORENTINO alleges that MISENER'S involvement is material because he participated in the Department's response to the threat report and had notice that plaintiff was seeking protection from coordinated recruit violence.

198. At approximately 2000 hours, MORELLO disbanded company 25-95 and suspended COLON.

199. CARABALLO also addressed the company and stated, in substance, that recruits were a family, needed to protect one another, and should look left and right because those were the people who would one day save their lives.

200. MORELLO'S and CARABALLO'S command response confirmed that FLORENTINO'S report was serious, credible, and command-level in nature.

201. FLORENTINO alleges, however, that disbanding the company and suspending only COLON was inadequate.

202. FLORENTINO alleges that ORTIZ, BIGGS, SANCHEZ, and COLON should have been immediately suspended pending termination-track review because plaintiff had reported that all four recruits participated in the planned coordinated locker-room assault.

203. FLORENTINO further alleges that the Department should have immediately seized, preserved, and reviewed all relevant phones, group chats, messages, deleted messages, unsent messages, social-media communications, Academy surveillance, witness statements, and related electronic evidence.

204. FLORENTINO alleges that defendants failed to do so.

205. FLORENTINO alleges that defendants instead allowed the planning-stage evidence of an alleged coordinated assault to be deleted, concealed, minimized, or lost.

206. FLORENTINO alleges that the failure to preserve evidence and the failure to suspend all involved recruits protected ORTIZ, BIGGS, SANCHEZ, and COLON while leaving plaintiff exposed to retaliation.

207. FLORENTINO further alleges that the Department's response signaled to other recruits and Academy personnel that plaintiff's safety complaints could be minimized, reframed, or punished.

208. FLORENTINO alleges that MORELLO failed to ensure evidence preservation, protection from retaliation, gender-sensitive corrective action, meaningful investigation, and correction of the hostile Academy environment after receiving actual notice.

209. FLORENTINO alleges that CARABALLO and MISENER likewise failed to ensure that the report of a planned locker-room assault was handled as a serious workplace-safety, sex-based hostility, retaliation, and evidence-preservation matter.

210. FLORENTINO further alleges that MORELLO'S prior history involving female members of the service, including allegations in the Shatorra Foster matter concerning failure to ensure victim-status-sensitive, conflict-aware, evidence-preserving, and non-retaliatory handling of sexual-misconduct and retaliation allegations, is relevant to notice, tolerance, ratification, and the Department's failure to treat FLORENTINO'S complaints as serious workplace misconduct requiring protection and correction.

211. FLORENTINO alleges that this incident became a turning point in the Academy's treatment of her.

212. After plaintiff reported the planned locker-room assault, defendants did not treat her primarily as a victim, complainant, witness, or protected-activity source.

213. Instead, the Department increasingly treated her as a problem recruit whose complaints, injury reports, and safety concerns had to be managed, isolated, disciplined, or removed from the Academy pipeline.

G. Defendant Meraj A. Chaudary's Reputational Retaliation After the Threat Report

214. On or about February 19, 2026, FLORENTINO returned to the Police Academy after reporting the planned locker-room assault, group-chat evidence, property damage, and unsafe Academy conditions.

215. Defendant MERAJ A. CHAUDARY was, at all relevant times, an NYPD Police Academy instructor, Academy actor, Department member, and/or officer in charge of recruit company 25-100, assigned to or operating within the NYPD Police Academy.

216. After FLORENTINO returned to the Academy, defendant CHAUDARY allegedly photographed FLORENTINO without a legitimate work-related purpose.

217. Defendant CHAUDARY allegedly transmitted, circulated, or caused FLORENTINO'S image to be circulated in a chat with other police officers or members of the service working outside the Academy.

218. Defendant CHAUDARY allegedly told his company, in substance, that when someone carries herself like FLORENTINO, she will not succeed in policing.

219. Defendant CHAUDARY allegedly stated that FLORENTINO thought she could walk around and get away with everything because the "bitch thinks she's pretty."

220. Defendant CHAUDARY allegedly called or contacted other members of the service concerning FLORENTINO.

221. FLORENTINO alleges that CHAUDARY'S conduct was not a neutral, or legitimate Academy communication.

222. FLORENTINO alleges that CHAUDARY'S conduct was gendered, appearance-based, humiliating, retaliatory, and designed to damage her reputation within the Department.

223. FLORENTINO further alleges that CHAUDARY'S use of the term "bitch," his reference to plaintiff thinking she was "pretty," and his statement that she would not succeed in policing reflected gender-based hostility and sex-stereotyped animus.

224. FLORENTINO alleges that CHAUDARY'S conduct occurred immediately after she reported coordinated threats, group-chat evidence, property damage, and a planned locker-room assault by other recruits.

225. FLORENTINO alleges that the timing of CHAUDARY'S conduct supports an inference of retaliation.

226. FLORENTINO further alleges that CHAUDARY'S conduct amplified the hostile Academy environment by spreading a derogatory and sexualized narrative about her to other members of the service.

227. FLORENTINO alleges that CHAUDARY'S conduct made it harder for her to receive fair treatment, neutral supervision, and equal training opportunity within the Academy.

228. FLORENTINO further alleges that CHAUDARY'S conduct is part of the broader pattern in which plaintiff was treated not as a victim, complainant, witness, or protected-activity source, but as a recruit to be mocked, discredited, isolated, disciplined, and removed from the Academy pipeline.

H. Reassignment to Company 25-103 and Continued Hostility

229. On or about February 19, 2026, FLORENTINO was reassigned to recruit company 25-103.

230. After her reassignment, FLORENTINO observed that certain female recruits in company 25-103 were hostile toward her.

231. FLORENTINO alleges that BIGGS and ORTIZ continued to interact with recruits in her new company.

232. FLORENTINO alleges that male recruits in company 25-103 spoke to her, but that female recruits responded with sexualized comments, including remarks that FLORENTINO was a recruit's "new girlfriend."

233. FLORENTINO further alleges that another recruit joked, "Abel, I'm divorcing you."

234. FLORENTINO alleges that company 25-103 had an obvious sexualized environment, including recruits sleeping with one another.

235. FLORENTINO alleges that her transfer did not correct the hostile environment, but instead placed her into another setting where she was watched, mocked, and sexualized.

I. February 25–26, 2026 Phone Review, Intimidation, and Discretion Warning

236. On or about February 25, 2026, FLORENTINO took a quiz in Police Officer Tiamarie Marshall's class.

237. After FLORENTINO stated that she had not received quiz-correction instructions, Police Officer Marshall reviewed FLORENTINO'S phone and Recruit Tripoli's phone in front of the class.

238. FLORENTINO alleges that the phone review was intrusive, unnecessary, humiliating, and part of the escalating scrutiny directed at her after she reported misconduct.

239. On or about February 26, 2026, Police Officer Marshall and SICILIANO caused FLORENTINO to be removed from class and brought to a separate room.

240. SICILIANO and Police Officer Marshall stood over FLORENTINO while she sat.

241. SICILIANO accused FLORENTINO of being disruptive, abrasive, and disrespectful to the chain of command.

242. SICILIANO threatened FLORENTINO and told her not to speak unless spoken to, not to look in the wrong direction, and not to breathe in the wrong direction.

243. Police Officer Marshall told FLORENTINO that company 25-103 was a good group and that she did not need FLORENTINO coming from another company and “poisoning” them.

244. SICILIANO stated that they were using their discretion, were not taking a card, were not giving a command discipline, and were giving FLORENTINO her first and last warning.

245. FLORENTINO apologized to avoid further discipline and continue toward graduation.

246. FLORENTINO alleges that this meeting was retaliatory, intimidating, and designed to silence her after she had reported threats, property damage, and unsafe Academy conditions.

247. FLORENTINO further alleges that the threat caused her to fear speaking, participating, or even using the restroom during Police Officer Marshall’s class.

J. Protected Activity and Continued Chilling After the Warning

248. On or about February 27, 2026, FLORENTINO spoke with Detective Earl Cooper.

249. FLORENTINO told Detective Cooper that she had been threatened by Police Officer Marshall and SICILIANO the day before.

250. FLORENTINO told Detective Cooper that she wanted to graduate and get out of the Academy.

251. Detective Cooper told FLORENTINO that she was welcome to speak and participate in his class and that she should keep doing what she was doing.

252. Later that day, Police Officer Marshall told FLORENTINO that she had noticed FLORENTINO was quiet and withdrawn.

253. Police Officer Marshall acknowledged that SICILIANO had been abrasive and that the prior day's conduct had gone overboard.

254. FLORENTINO alleges that she did not engage and remained guarded.

255. FLORENTINO alleges that after the February 26 warning, she avoided speaking and avoided using the restroom during Police Officer Marshall's class.

256. FLORENTINO further alleges that she limited her water intake to avoid having to use the restroom during Police Officer Marshall's class.

257. FLORENTINO alleges that the warning altered her conditions of training and chilled her participation in the Academy.

K. GUERRERO-CEDENO Strike, Sexualized Framing, and False Domestic-Violence Label

258. On or about March 25, 2026, GUERRERO-CEDENO was swinging his duffle bag while walking ahead of FLORENTINO.

259. FLORENTINO asked GUERRERO-CEDENO to stop because she was behind him and he could hurt her.

260. Later that tour, GUERRERO-CEDENO struck FLORENTINO from behind with the duffle bag at full force.

261. The strike pushed FLORENTINO off balance.

262. GUERRERO-CEDENO laughed, stated “you tapped me,” apologized, and hugged FLORENTINO.

263. FLORENTINO told GUERRERO-CEDENO that the conduct was not funny and that she did not play games that could cause injury.

264. Recruit Tripoli stated, “dude I saw that why would you hit her like that.”

265. Recruits Anthony C. Canales and Matthew R. Teixeira stated that they did not see anything.

266. FLORENTINO was limping the following day.

267. On or about March 27, 2026, FLORENTINO was called to speak with SEMINERIO, SICILIANO, Sergeant Jermaine A. Aspinall, and MISENER.

268. SEMINERIO and SICILIANO asked whether FLORENTINO had been involved in an altercation with a classmate.

269. FLORENTINO explained that GUERRERO-CEDENO had struck her.

270. SEMINERIO asked whether the strike was a “bad method of flirting” or whether GUERRERO-CEDENO had offered FLORENTINO lunch and she had refused.

271. FLORENTINO answered no.

272. SICILIANO questioned why FLORENTINO had not reported the incident.

273. FLORENTINO explained that she thought it was isolated, that GUERRERO-CEDENO had apologized, and that he had asked whether she needed anything for her knee.

274. SEMINERIO and SICILIANO screamed at FLORENTINO while she sat surrounded by them.

275. SEMINERIO stated, in substance, that FLORENTINO and GUERRERO-CEDENO were friends and that nothing was wrong.

276. FLORENTINO showed SEMINERIO her knee injury.

277. FLORENTINO alleges that defendants sexualized GUERRERO-CEDENO'S physical conduct instead of treating her as the injured recruit.

278. FLORENTINO further alleges that defendants later falsely framed the incident as "domestic violence other MOS on MOS," even though she had no qualifying relationship with GUERRERO-CEDENO.

L. IAB Interview, Personal-Phone Injury Photos, Suspension, and Command Ratification

279. On or about March 27, 2026, FLORENTINO was removed from meal and placed in room 509.

280. FLORENTINO missed meal, gym, and social science.

281. Police Officer Alexandra N. Mazzone stood outside the restroom door when FLORENTINO was permitted to use the restroom.

282. FLORENTINO alleges that she was treated like a prisoner.

283. MARSHALL stated in the hallway that she was happy they finally got FLORENTINO.

284. Police Officer Edward H. Celona stated that FLORENTINO was a good kid who was always doing the right thing.

285. FLORENTINO met with PBA attorney Michael Martinez and MISENER.

286. Martinez and MISENER told FLORENTINO that she was being charged with “domestic violence other MOS on MOS.”

287. FLORENTINO questioned why the matter was being labeled domestic violence because she had no qualifying relationship with GUERRERO-CEDENO.

288. Martinez stated that it would all blow over and that none of it would stick.

289. Later that night, IAB interviewed FLORENTINO.

290. Present for the interview were Martinez, MISENER, SICILIANO, Sergeant Aspinnall, SEMINERIO, GONZALEZ, Sergeant Ma, Sergeant Lostagilo, and Detective Gurpreet Singh.

291. FLORENTINO told IAB what occurred.

292. Sergeant Ma spoke extremely fast and had FLORENTINO sign a document without providing her a copy.

293. Sergeant Ma directed SICILIANO to take photographs of FLORENTINO’S injuries.

294. SICILIANO took photographs of FLORENTINO’S leg on her personal phone in the female restroom.

295. Sergeant David P. Lostagilo asked FLORENTINO to text photographs of her injuries and screenshots of communications with GUERRERO-CEDENO.

296. FLORENTINO requested Sergeant Lostagilo’s NYPD email instead.

297. Sergeant Lostagilo appeared uncomfortable and annoyed.

298. As FLORENTINO left the room, she heard Sergeant Ma state, “I don’t think she actually did any of it.”

299. On or about March 28, 2026, GONZALEZ informed FLORENTINO that the stories did not match witness statements and that both she and GUERRERO-CEDENO were suspended pending investigation.

300. FLORENTINO was stripped of her department laptop, Department phone, OMNI card, and recruit identification.

301. FLORENTINO turned those items over to Sergeant Aspinall.

302. SICILIANO smiled during the suspension process.

303. MISENER walked FLORENTINO out and later texted her reporting instructions for the 114th Precinct.

304. FLORENTINO alleges that she was stonewalled after suspension and received no meaningful updates.

305. FLORENTINO further alleges that CHAUDARY sent a department-wide text stating that instructors were excited she had been suspended.

306. The Department's own March 28, 2026 suspension memorandum stated that FLORENTINO and GUERRERO-CEDENO were both assigned to the Police Academy Recruit Training Section and were suspended following a physical altercation inside the Police Academy under the overall authority of Deputy Chief CHRIS D. MORELLO.

307. The memorandum alleged that GUERRERO-CEDENO intentionally struck FLORENTINO on the back of her right calf with his recruit duffle bag.

308. The memorandum further alleged that FLORENTINO then turned and punched GUERRERO-CEDENO in the face with a closed fist.

309. The memorandum stated that GUERRERO-CEDENO reported no injuries and did not request medical attention.

310. The memorandum identified GONZALEZ, SEMINERIO, IAB personnel, and others as present or notified.

311. The memorandum further stated that Charges and Specifications were recommended against both subjects.

312. The formal Charges and Specifications against FLORENTINO were dated April 1, 2026.

313. The Charges and Specifications charged FLORENTINO with conduct prejudicial to the good order, efficiency, or discipline of the Department based on an alleged physical altercation with another member of the Department.

314. The Charges and Specifications were signed by MORELLO as Deputy Chief.

315. MATERASSO, as Chief of Training, concurred in issuance of the Charges and Specifications on or about April 8, 2026.

316. FLORENTINO alleges that the Department's own paperwork confirms that MORELLO and MATERASSO were not remote actors but command-level participants in the disciplinary processing arising from the GUERRERO-CEDENO incident.

M. Modified-Duty Return, Equipment Disparity, and Termination-Track Messaging

317. On or about April 22, 2026, FLORENTINO received a call from the Department Advocate's Office directing her to report to One Police Plaza on April 27, 2026.

318. On or about April 27, 2026, FLORENTINO reported to One Police Plaza and was restored to modified duty.

319. FLORENTINO was then directed to report to the Academy.

320. FLORENTINO was assigned to company 25-110.

321. FLORENTINO had no access to her department laptop, Department phone, or Department email.

322. On or about April 29, 2026, FLORENTINO observed that GUERRERO-CEDENO had his department laptop and work phone.

323. Sergeant Robert M. Sanderlin stated to GUERRERO-CEDENO that they should never have given those items back to him.

324. FLORENTINO alleges that GUERRERO-CEDENO was treated more favorably despite being the male recruit who struck her.

325. On or about May 1, 2026, FLORENTINO inquired about range and other trainings and was told that she had to complete missed training sequentially.

326. On or about May 5, 2026, Detective David Marmol told FLORENTINO that when incidents like hers occur, recruits are out of the Department.

327. Detective Marmol stated that he was surprised FLORENTINO was still there.

328. Detective Marmol told FLORENTINO to do what was placed in front of her, collect her check, and understand that the Department could still terminate her.

329. Detective Marmol stated that suspension from recruit school was a serious offense.

330. FLORENTINO alleges that Detective Marmol's statements communicated that she remained on a termination track regardless of her performance.

N. Vest-Safety Issue, Disabled Access, and Manufactured Discipline

331. On or about May 7, 2026, FLORENTINO reported a serious issue with her ballistic vest inflating and obstructing her airway.

332. Principal Valentin instructed FLORENTINO not to wear the vest and to report to the vest unit on May 12, 2026.

333. CARABALLO confirmed the May 12 reporting instruction.

334. FLORENTINO informed Police Officer Mazzone about the vest issue.

335. FLORENTINO also informed SICILIANO that she did not have her vest because the vest unit instructed her not to wear it due to a safety issue.

336. SICILIANO yelled at FLORENTINO and threatened to cross-check whether she was lying.

337. On or about May 8, 2026, Principal Valentin again instructed FLORENTINO not to wear the vest.

338. BARNES told FLORENTINO to remove the vest, asked whether she was suffocating, laughed, and sent her to payroll.

339. On or about May 12, 2026, FLORENTINO reported early to the vest unit, was measured, and received a loaner vest.

340. When FLORENTINO asked whether her vest would be ready for graduation, Sergeant Mark H. Assael stated, "you're a holdover."

341. Later that day, FLORENTINO asked BARNES about access to her laptop and study materials.

342. BARNES stated, in substance, that FLORENTINO should not come asking questions because she had family on the job and could ask them instead.

343. FLORENTINO spoke with PBA Delegate Police Officer Christopher J. Sinnona, who informed her that modified recruits were not required to attend certain trainings and should maintain their schedule and sign in and out for tour and meal.

344. FLORENTINO alleges that she had not previously been told this.

345. Later that day, BARNES and SICILIANO yelled at FLORENTINO in front of recruits and accused her of committing “perjury” in the logbook.

346. BARNES accused FLORENTINO of making an unauthorized tour change.

347. FLORENTINO explained that she had signed in at the time she arrived because she had been verbally instructed to report early.

348. BARNES threatened FLORENTINO with a command discipline for lying on a legal document and making an unauthorized tour change.

349. When FLORENTINO asked to speak to her delegate, BARNES shook her badge in FLORENTINO’S face and stated, “do you see my shield.”

350. BARNES further stated that she did not deal with police officers because it was below her.

351. FLORENTINO alleges that she never received written notification of either a 1200 or 1530 reporting time.

352. FLORENTINO further alleges that she had no access to her department phone or email because her account had been disabled.

353. FLORENTINO alleges that she could not receive Department communications unless they were provided by hard copy or directly communicated to her.

354. Later that day, Sergeant Nicholas C. Imperato required FLORENTINO to complete a disciplinary card because she allegedly failed to sign in and out for meal after BARNES had told her to get out of her face.

355. FLORENTINO alleges that the vest-safety issue was converted into a disciplinary event.

O. Continued Training Exclusion, Comparator Treatment, and Derogatory Immigrant Comment

356. On or about May 22, 2026, BARNES addressed FLORENTINO by her first name and called her “Slims.”

357. FLORENTINO alleges that this marked the beginning of BARNES addressing her by her first name in a disrespectful manner.

358. On or about May 22, 2026, Sergeant Jesus A. Reyes informed FLORENTINO that he had a notice for her concerning a command discipline and five cards.

359. FLORENTINO had not yet seen the command discipline from May 12, 2026.

360. FLORENTINO asked whether she could attend range training because she had received no tour change or notification stating that she could not attend.

361. FLORENTINO was later verbally informed that she could not attend week 3 of the range with company 25-110 because she had not completed week 2.

362. FLORENTINO was assigned to company 25-100.

363. FLORENTINO observed Recruit Garcia (25-110), a limited recruit who had also missed range training, being sent to week 3 of the range.

364. FLORENTINO alleges that Recruit Garcia was allowed to skip week 2 and attend week 3 while FLORENTINO was denied the same opportunity.

365. FLORENTINO alleges that this comparator treatment reflected selective enforcement and discriminatory training exclusion.

366. On or about May 25, 2026, BARNES allegedly stated, “apparently CAD only hires immigrants’ non-English speakers.”

367. FLORENTINO alleges that BARNES made this comment when another recruit presented name-change documents and FLORENTINO entered recruit operations.

368. FLORENTINO alleges that BARNES' comment reflected ethnicity, national-origin, and immigrant-status hostility.

369. On or about May 26, 2026, FLORENTINO requested time off for her father's emergency medical appointment.

370. Sergeant Imperato approved the request.

371. FLORENTINO triple-checked the approval because she feared problems with BARNES.

372. On or about May 27, 2026, BARNES again referred to FLORENTINO as "Slims" when FLORENTINO reported for duty.

373. FLORENTINO later asked about a justification examination that other recruits, including GUERRERO-CEDENO, had taken.

374. FLORENTINO was told that others had taken the examination and asked whether anyone had informed her.

375. FLORENTINO stated that she had no access to email, work phone, or other Department communications unless recruit operations communicated directly with her.

376. FLORENTINO alleges that BARNES was supposed to situate the issue.

377. FLORENTINO alleges that she was deprived of equal training information, equal testing notice, and equal opportunity to complete Academy requirements.

P. Continued Training Exclusion and Spread of False Narrative

378. On or about June 4, 2026, FLORENTINO attended active-shooter training with her class.

379. On or about June 5, 2026, FLORENTINO attended LGBTQAI+ workshop training.

380. On or about June 8, 2026, FLORENTINO attended Safe And Focused Enforcement & Responsibility (SAFER) training.

381. FLORENTINO asked MISENER whether she would be able to attend drivers training.

382. MISENER stated that she should be able to attend because drivers training did not involve firearms.

383. Later that night, Sergeant Imperato verbally informed FLORENTINO that she could not attend drivers training.

384. From on or about June 9, 2026 through June 11, 2026, FLORENTINO'S company attended Drivers training at Floyd Bennett Field.

385. FLORENTINO did not attend drivers training with her company.

386. On or about June 9, 2026, FLORENTINO attended SAFER training with company 25-101.

387. During that training, Recruit Austin M. Dunalevy (25-101) stated, in substance, that FLORENTINO was "the girl who punched someone" in company 25-103 and that recruits there did not like her.

388. Recruit Dunalevy stated that his father worked in IAB and that Tripoli said she hated FLORENTINO and could not believe it did not work to fire her.

389. FLORENTINO responded that, if Dunalevy's father worked in IAB, he would know the matter was not a subject of conversation.

390. FLORENTINO alleges that this incident confirmed that defendants' false narrative had spread beyond the immediate actors involved in the GUERRERO-CEDENO incident.

391. FLORENTINO further alleges that the spread of the false narrative contributed to her isolation, reputational injury, and continued training exclusion.

Q. Risk Management Termination Recommendation and Forced-Resignation Pressure

392. On or about June 11, 2026, PBA attorney Michael Martinez called FLORENTINO with an update concerning her case.

393. Martinez stated that he had contacted the Department and that Risk Management had recommended termination.

394. Martinez stated that, when Risk Management recommends termination, the matter is handed to the Department Advocate's Office, then signed off, followed by Police Commissioner sign-off.

395. Martinez stated that if the Police Commissioner signed off, FLORENTINO would no longer be hireable by city, state, or federal government.

396. Martinez stated that there was nothing he could really do because FLORENTINO was a probationary police officer recruit.

397. Martinez asked whether FLORENTINO had been involved in anything else that might have caused Risk Management to make the recommendation.

398. FLORENTINO reported the recent verbal command-discipline issue involving her vest and alleged unauthorized tour change.

399. Martinez stated that there had to be more and asked whether camera footage had been shown to her.

400. FLORENTINO stated that no footage had been shown to her.

401. Martinez told FLORENTINO that her only options were to resign or receive a termination letter that could happen at any moment.

402. Martinez stated that the Police Commissioner could sign the termination and it could be waiting for FLORENTINO the next day.

403. Martinez stated that the difference was that one option allowed unemployment and the other did not.

404. FLORENTINO alleges that this conversation placed her under severe financial, emotional, and career pressure.

405. FLORENTINO alleges that she believed she had to choose between forced resignation and termination with permanent collateral consequences.

406. FLORENTINO alleges that the resignation was not voluntary.

407. FLORENTINO alleges that the resignation resulted from retaliatory discipline, false domestic-violence framing, training exclusion, disabled Department access, manufactured discipline, Risk Management termination-track processing, and the threat of permanent career consequences.

R. June 11, 2026 Resignation Processing and Altered Exit Paperwork

408. On or about June 11, 2026, at approximately 1528 hours, FLORENTINO entered the Police Academy through the West Gate entrance.

409. At approximately 1530 hours, FLORENTINO spoke with CARABALLO and Sergeant David J. Baldson near the muster-deck entrance.

410. FLORENTINO told CARABALLO that she was resigning and that the decision was not because of him, the physical requirements, or the academics.

411. FLORENTINO told CARABALLO that she was resigning because of everything else occurring in the building.

412. CARABALLO stated, in substance, that if FLORENTINO ever wanted to return, the doors would be open and she would be welcome to return.

413. At approximately 1536 hours, FLORENTINO informed Human Resources of her resignation and was referred to recruit operations.

414. Sergeants Neftali Febo and Imperato participated in the resignation-processing sequence.

415. At approximately 1613 hours, Imperato handed FLORENTINO documents and instructed her to complete the answers.

416. Sergeant Febo stated that whatever FLORENTINO left blank would remain blank and that not every question applied to her.

417. At approximately 1620 hours, Recruit Robert M. Bollman came in and out of recruit operations and instructed FLORENTINO to change her "N/A" answers to "NOTHING."

418. Sergeant Febo stated that an exit interview would be conducted.

419. At approximately 1635 hours, FLORENTINO was told to return her vest to the vest unit and obtain a receipt.

420. When FLORENTINO arrived at the vest unit, no one was present.

421. When FLORENTINO returned upstairs, Imperato, Assael, and Recruit Bollman were present.

422. Sergeant Assael stated that they would take the vest and confirm the documents.

423. Sergeant Assael reviewed part of the resignation paperwork with FLORENTINO and provided her a copy of page 1.

424. Sergeant Assael stated that there was a page 2 and that if FLORENTINO wanted it, she had to ask Candidate Assessment or her investigator.

425. FLORENTINO asked to see page 2.

426. Sergeant Assael refused.

427. Sergeant Assael stated that page 2 was the exit interview.

428. FLORENTINO alleges that no exit interview was conducted by recruit operations.

429. FLORENTINO alleges that the only resignation statement collected from her was, "I'd like to leave."

430. FLORENTINO further alleges that questions she left unanswered were later answered by someone other than herself.

431. FLORENTINO called her investigator, Police Officer Hasan Radoncic, while leaving the Academy.

432. FLORENTINO exited the Academy through the West Gate at approximately 1657 hours.

433. FLORENTINO alleges that the resignation-processing sequence was irregular, coercive, incomplete, and inconsistent with a voluntary resignation.

434. FLORENTINO further alleges that defendants' refusal to provide page 2, failure to conduct an exit interview, and completion or alteration of unanswered responses support an inference that the Department was manufacturing a resignation record to formalize a termination-track constructive discharge.

S. Litigation Significance of the Background

435. The specific incidents alleged above must be understood against the broader Academy background.

436. They were not isolated Academy disagreements.

437. They were part of an escalating pattern in which FLORENTINO was subjected to biased screening, sexualized recruit culture, gendered hostility, race and national-origin hostility, coordinated threats, physical injury, false domestic-violence framing, command-level ratification, discriminatory discipline, training exclusion, disabled communications access, and forced resignation after reporting hostile, discriminatory, and unsafe conditions.

438. FLORENTINO alleges that defendants' conduct violated the NYSHRL and NYCHRL by subjecting her to discriminatory treatment, hostile work environment, retaliation, aiding and abetting, interference, and forced resignation.

CONCLUSION

439. FLORENTINO entered the NYPD Police Academy qualified, performed successfully, and attempted to complete recruit training. Instead of receiving equal training opportunity and a safe workplace, she alleges that defendants subjected her to a hostile, discriminatory, retaliatory, and unsafe Academy environment.

440. FLORENTINO reported coordinated threats, group-chat evidence, property damage, and a planned locker-room assault. Rather than preserve evidence, protect her from retaliation, and correct the hostile environment, defendants allegedly minimized her complaints, allowed evidence to be destroyed or concealed, spread retaliatory narratives about her, and increasingly treated her as the problem.

441. The Department's response to the GUERRERO-CEDENO incident confirmed the discriminatory and retaliatory pattern. After GUERRERO-CEDENO struck FLORENTINO from behind and injured her, defendants allegedly sexualized the incident, falsely framed it as domestic violence, suspended her, stripped her of Department access, excluded her from training, manufactured discipline, and placed her on a termination track.

442. FLORENTINO alleges that her resignation was not voluntary. It was the foreseeable result of defendants' hostile work environment, discriminatory treatment, retaliatory discipline, training exclusion, disabled communications access, false disciplinary framing, Risk Management termination-track processing, and forced-resignation pressure.

443. Accordingly, plaintiff SLIMS FLORENTINO demands judgment against defendants, jointly and severally where permitted by law, awarding compensatory damages, punitive damages where available, attorneys' fees, costs, interest, equitable relief, correction, removal, and expungement of discriminatory, retaliatory, inaccurate, or contaminated NYPD employment, Academy, disciplinary, Risk Management, and resignation records, and such other and further relief as this Court deems just and proper.

VIOLATIONS AND CLAIMS ALLEGED

COUNT I

Sexual Harassment

New York State Human Rights Law

Executive Law § 296 et seq.

Against All Defendants

444. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

445. Plaintiff is a woman and was protected from sexual harassment under the New York State Human Rights Law.

446. Defendants subjected plaintiff to sexual harassment, sexualized treatment, and inferior terms, conditions, and privileges of employment because of sex.

447. The sexual harassment included, but was not limited to, sexualized recruit culture, gendered insults, appearance-based degradation, sexualized assumptions concerning plaintiff's

interactions with male recruits, sexualized framing of GUERRERO-CEDENO'S physical conduct, and the false framing of that incident as "domestic violence other MOS on MOS."

448. Defendants' conduct, individually and collectively, altered the terms, conditions, and privileges of plaintiff's Academy training and employment.

449. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, or materially contributed to the sexual harassment alleged herein.

450. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents.

451. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

COUNT II
Race, Ethnicity, National Origin, and/or
Perceived Citizenship or Immigration Status Discrimination
New York State Human Rights Law
Executive Law § 296 et seq.
Against All Defendants

452. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

453. Plaintiff is Dominican and belongs to protected classes based on race, ethnicity, and national origin.

454. Plaintiff was also subjected to comments and treatment reflecting hostility based on perceived citizenship, immigration status, language status, ethnicity, and national origin.

455. Defendants subjected plaintiff to inferior terms, conditions, and privileges of employment because of race, ethnicity, national origin, perceived citizenship or immigration status, and/or related protected characteristics.

456. The discriminatory conduct included, but was not limited to, the Hispanic/Spanish cafeteria comment, the immigrant/non-English-speaker comment, differential treatment in training access, selective enforcement, disciplinary processing, disabled communications access, Academy support, record treatment, and forced-resignation pressure.

457. Plaintiff alleges that the race, ethnicity, national-origin, perceived citizenship, immigration-status, and language-related hostility was part of the broader discriminatory Academy environment.

458. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, or materially contributed to the discriminatory conduct alleged herein.

459. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents.

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

COUNT III
Actual or Perceived Domestic-Violence Victim Status Discrimination
New York State Human Rights Law
Executive Law § 296 et seq.
Against All Defendants

461. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

462. The New York State Human Rights Law prohibits discrimination in employment based on actual or perceived status as a victim of domestic violence.

463. Defendants falsely framed the GUERRERO-CEDENO incident as “domestic violence other MOS on MOS,” despite the absence of any qualifying domestic, romantic, intimate, family, household, or statutory relationship between plaintiff and GUERRERO-CEDENO.

464. Defendants’ false domestic-violence framing caused plaintiff to be treated as a disciplinary subject rather than as an injured recruit, complainant, witness, and protected-activity source.

465. Defendants’ actual or perceived domestic-violence framing materially contributed to plaintiff’s suspension, removal from recruit training, disabled Department access, disciplinary processing, termination-track treatment, reputational injury, and forced resignation.

466. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, or materially contributed to the actual or perceived domestic-violence victim status discrimination alleged herein.

467. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents.

468. As a direct and proximate result of defendants’ unlawful conduct, plaintiff suffered damages.

COUNT IV
Hostile Work Environment
New York State Human Rights Law
Executive Law § 296 et seq.
Against All Defendants

469. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

470. Plaintiff was subjected to a hostile work environment in violation of the New York State Human Rights Law.

471. The hostile work environment included, but was not limited to, sexualized recruit culture, gendered hostility, race, ethnicity, national-origin, perceived citizenship, immigration-status, and language-related hostility, isolation, restroom surveillance, property damage, coordinated threats, group-chat evidence, a planned locker-room assault, reputational retaliation, intimidation, false disciplinary framing, training exclusion, disabled Department access, and forced-resignation pressure.

472. Defendants knew or should have known of the hostile work environment after plaintiff reported property damage, coordinated threats, group-chat evidence, unsafe Academy conditions, and the planned locker-room assault.

473. Rather than correct the hostile environment, defendants allegedly minimized plaintiff's complaints, failed to preserve evidence, failed to suspend all involved recruits, allowed retaliatory narratives to spread, and increasingly treated plaintiff as the problem.

474. Defendants' conduct subjected plaintiff to inferior terms, conditions, and privileges of employment.

475. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, or materially contributed to the hostile work environment alleged herein.

476. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents.

477. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

COUNT V
Retaliation
New York State Human Rights Law
Executive Law § 296 et seq.
Against All Defendants

478. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

479. Plaintiff engaged in protected activity by opposing, reporting, and complaining about hostile, discriminatory, retaliatory, unsafe, and unlawful Academy conditions.

480. Plaintiff's protected activity included, but was not limited to, reporting gendered hostility, property damage, group-chat evidence, coordinated threats, a planned locker-room assault, unsafe Academy conditions, injury from GUERRERO-CEDENO'S physical conduct, false disciplinary framing, lack of Department access, training exclusion, and retaliatory treatment.

481. Defendants knew of plaintiff's protected activity.

482. After plaintiff engaged in protected activity, defendants subjected her to materially adverse and inferior treatment.

483. The retaliatory treatment included, but was not limited to, failure to preserve evidence, failure to protect plaintiff, reputational retaliation, intimidation, sexualized framing, false domestic-violence labeling, suspension, equipment removal, disabled Department access,

exclusion from training, manufactured discipline, selective enforcement, Risk Management termination-track processing, and forced-resignation pressure.

484. Plaintiff alleges a causal connection between her protected activity and defendants' retaliatory conduct based on timing, sequence, direct knowledge, escalating hostility, differential treatment, and the Department's use of plaintiff's complaints, injury report, and opposition as a basis to isolate, discipline, and remove her from the Academy pipeline.

485. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, or materially contributed to the retaliation alleged herein.

486. Defendant THE CITY OF NEW YORK is liable for the retaliatory acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents.

487. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

COUNT VI
Sexual Harassment
New York City Human Rights Law
Administrative Code of the City of New York § 8-107 et seq.
Against All Defendants

488. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

489. Plaintiff is a woman and was protected from sexual harassment under the New York City Human Rights Law.

490. Defendants subjected plaintiff to sexual harassment, sexualized treatment, and inferior terms, conditions, and privileges of employment because of gender.

491. The sexual harassment included, but was not limited to, sexualized recruit culture, gendered insults, appearance-based degradation, sexualized assumptions concerning plaintiff's interactions with male recruits, sexualized framing of GUERRERO-CEDENO'S physical conduct, and false framing of that incident as "domestic violence other MOS on MOS."

492. Plaintiff's gender was a motivating factor in defendants' conduct.

493. Defendants treated plaintiff less well, in whole or in part, because of gender.

494. Defendants' conduct was more than petty slights or trivial inconveniences.

495. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, interfered with plaintiff's protected rights, or materially contributed to the sexual harassment alleged herein.

496. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents under the NYCHRL.

497. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

COUNT VII
Race, Ethnicity, National Origin, and/or
Perceived Citizenship or Immigration Status Discrimination
New York City Human Rights Law
Administrative Code of the City of New York § 8-107 et seq.
Against All Defendants

498. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

499. Plaintiff is Dominican and belongs to protected classes based on race, ethnicity, and national origin.

500. Plaintiff was also subjected to comments and treatment reflecting hostility based on perceived citizenship status, immigration status, language status, ethnicity, and national origin.

501. Defendants treated plaintiff less well and subjected her to inferior terms, conditions, and privileges of employment because of race, ethnicity, national origin, perceived citizenship or immigration status, and/or related protected characteristics.

502. The discriminatory conduct included, but was not limited to, the Hispanic/Spanish cafeteria comment, the immigrant/non-English-speaker comment, differential treatment in training access, selective enforcement, disciplinary processing, disabled communications access, Academy support, record treatment, and forced-resignation pressure.

503. Plaintiff's race, ethnicity, national origin, perceived citizenship status, and/or perceived immigration status was a motivating factor in defendants' conduct.

504. Defendants' conduct was more than petty slights or trivial inconveniences.

505. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, interfered with plaintiff's protected rights, or materially contributed to the discriminatory conduct alleged herein.

506. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents under the NYCHRL.

507. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

COUNT VIII
Actual or Perceived Domestic-Violence Victim Status Discrimination
New York City Human Rights Law
Administrative Code of the City of New York §§ 8-107 and 8-107.1
Against All Defendants

508. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

509. The New York City Human Rights Law prohibits employment discrimination based on actual or perceived status as a victim of domestic violence.

510. Defendants falsely framed the GUERRERO-CEDENO incident as “domestic violence other MOS on MOS,” despite the absence of any qualifying domestic, romantic, intimate, family, household, or statutory relationship between plaintiff and GUERRERO-CEDENO.

511. Defendants treated plaintiff less well and subjected her to inferior terms, conditions, and privileges of employment based on actual or perceived domestic-violence victim status.

512. Defendants’ false domestic-violence framing caused plaintiff to be treated as a disciplinary subject rather than as an injured recruit, complainant, witness, and protected-activity source.

513. Defendants’ actual or perceived domestic-violence framing materially contributed to plaintiff’s suspension, removal from recruit training, disabled Department access, disciplinary processing, termination-track treatment, reputational injury, and forced resignation.

514. Plaintiff’s actual or perceived domestic-violence victim status was a motivating factor in defendants’ conduct.

515. Defendants’ conduct was more than petty slights or trivial inconveniences.

516. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, interfered with plaintiff's protected rights, or materially contributed to the actual or perceived domestic-violence victim status discrimination alleged herein.

517. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents under the NYCHRL.

518. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

COUNT IX
Hostile Work Environment
New York City Human Rights Law
Administrative Code of the City of New York § 8-107 et seq.
Against All Defendants

519. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

520. Defendants subjected plaintiff to a hostile work environment in violation of the New York City Human Rights Law.

521. The hostile work environment included, but was not limited to, sexualized recruit culture, gendered hostility, race, ethnicity, national-origin, perceived citizenship, immigration-status, and language-related hostility, isolation, restroom surveillance, property damage, coordinated threats, group-chat evidence, a planned locker-room assault, reputational retaliation, intimidation, false disciplinary framing, training exclusion, disabled Department access, and forced-resignation pressure.

522. Defendants treated plaintiff less well and subjected her to inferior terms, conditions, and privileges of employment because of her protected characteristics and protected activity.

523. Plaintiff's gender, race, ethnicity, national origin, perceived citizenship status, perceived immigration status, actual or perceived domestic-violence victim status, and/or protected activity was a motivating factor in defendants' hostile treatment.

524. Defendants knew or should have known of the hostile work environment after plaintiff reported property damage, coordinated threats, group-chat evidence, unsafe Academy conditions, and the planned locker-room assault.

525. Rather than correct the hostile environment, defendants allegedly minimized plaintiff's complaints, failed to preserve evidence, failed to suspend all involved recruits, allowed retaliatory narratives to spread, and increasingly treated plaintiff as the problem.

526. Defendants' conduct was more than petty slights or trivial inconveniences.

527. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, interfered with plaintiff's protected rights, or materially contributed to the hostile work environment alleged herein.

528. Defendant THE CITY OF NEW YORK is liable for the acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents under the NYCHRL.

529. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

COUNT X
Retaliation
New York City Human Rights Law
Administrative Code of the City of New York § 8-107 et seq.
Against All Defendants

530. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

531. Plaintiff engaged in protected activity by opposing, reporting, and complaining about hostile, discriminatory, retaliatory, unsafe, and unlawful Academy conditions.

532. Plaintiff's protected activity included, but was not limited to, reporting gendered hostility, property damage, group-chat evidence, coordinated threats, a planned locker-room assault, unsafe Academy conditions, injury from GUERRERO-CEDENO'S physical conduct, false disciplinary framing, lack of Department access, training exclusion, and retaliatory treatment.

533. Defendants knew of plaintiff's protected activity.

534. After plaintiff engaged in protected activity, defendants engaged in conduct reasonably likely to deter a person from opposing discrimination, reporting discriminatory conduct, or participating in protected activity.

535. The retaliatory conduct included, but was not limited to, failure to preserve evidence, failure to protect plaintiff, reputational retaliation, intimidation, sexualized framing, false domestic-violence labeling, suspension, equipment removal, disabled Department access, exclusion from training, manufactured discipline, selective enforcement, Risk Management termination-track processing, and forced-resignation pressure.

536. Plaintiff alleges a causal connection between her protected activity and defendants' retaliatory conduct based on timing, sequence, direct knowledge, escalating hostility,

differential treatment, and the Department's use of plaintiff's complaints, injury report, and opposition as a basis to isolate, discipline, and remove her from the Academy pipeline.

537. Defendants' conduct was reasonably likely to deter plaintiff and other persons from opposing discriminatory practices.

538. Each defendant directly participated in, aided, abetted, incited, compelled, coerced, facilitated, tolerated, ratified, failed to correct, interfered with plaintiff's protected rights, or materially contributed to the retaliation alleged herein.

539. Defendant THE CITY OF NEW YORK is liable for the retaliatory acts and omissions of its officers, supervisors, command personnel, Academy personnel, recruit operations personnel, Training Bureau personnel, Risk Management personnel, and other agents under the NYCHRL.

540. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered damages.

JURY TRIAL

541. Plaintiff SLIMS FLORENTINO hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff SLIMS FLORENTINO respectfully requests that judgment be entered in her favor and against Defendants, awarding the following relief:

- a. Declaring that defendants violated plaintiff's rights under the New York State Human Rights Law and the New York City Human Rights Law;
- b. Awarding plaintiff compensatory damages, including but not limited to back pay, front pay where necessary, lost benefits, lost pension and seniority-related

- benefits, lost overtime and differential opportunities, emotional distress damages, reputational damages, professional damages, and all other compensable losses;
- c. Awarding punitive damages against the individual defendants and any defendant against whom punitive damages are available by law;
 - d. Awarding plaintiff reasonable attorneys' fees, costs, disbursements, expert fees where recoverable, pre-judgment interest, post-judgment interest, and all other monetary relief available by law;
 - e. Directing defendants to reinstate plaintiff SLIMS FLORENTINO to employment with the New York City Police Department as a probationary police officer recruit or police officer, with full restoration of pay, benefits, seniority, service credit, pension credit, employment status, Academy standing, and all rights and privileges she would have received but for defendants' unlawful conduct;
 - f. Directing defendants to permit plaintiff to complete any remaining Academy, administrative, certification, or graduation requirements without discrimination, retaliation, harassment, interference, selective enforcement, or further contaminated disciplinary treatment;
 - g. Directing defendants to graduate plaintiff from the NYPD Police Academy upon completion of any lawful, valid, uniformly administered, and non-retaliatory remaining requirements;
 - h. Directing defendants to assign plaintiff to a permanent police command after graduation so that she may complete the field-training process under lawful, non-discriminatory, non-retaliatory, gender-sensitive, and properly supervised conditions;

- i. Directing defendants to correct, remove, seal, expunge, or otherwise neutralize all discriminatory, retaliatory, inaccurate, misleading, or contaminated NYPD employment, Academy, disciplinary, Risk Management, suspension, resignation, termination-track, and personnel records concerning plaintiff;
- j. Enjoining defendants from relying on any discriminatory, retaliatory, inaccurate, misleading, or contaminated record, notation, recommendation, charge, command discipline, Risk Management entry, resignation paperwork, or termination-track material to deny plaintiff reinstatement, graduation, command assignment, field training, benefits, future employment, or any other employment-related opportunity;
- k. Directing defendants to provide such equitable, declaratory, injunctive, restorative, and record-corrective relief as necessary to place plaintiff in the position she would have occupied absent defendants' unlawful conduct; and
- l. Awarding such other and further relief as this Court deems just, proper, and equitable.

Dated: June 15, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SLIMS FLORENTINO

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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: June 15, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SLIMS FLORENTINO

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

INDEX NO.:

SLIMS FLORENTINO

Plaintiff,

-against-

THE CITY OF NEW YORK; JESSICA S. TISCH; MARTINE
N. MATERASSO; CHRIS D. MORELLO; JOSE L.
CARABALLO; ALBERTO GONZALEZ; JOHN J.
SEMINERIO; NATALIE L. BARNES; OLIVIA SICILIANO;
YADIRIS A. TAVERAS; MATTHEW S. MISENER; ABEL
GUERRERO-CEDENO; ASTRID A. ORTIZ;
ANYSSACHEYENNE A. BIGGS; JADAMIL SANCHEZ;
CIELO P. COLON; and MERAJ A. CHAUDARY

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff SLIMS FLORENTINO

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