

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
DAVID R. TERRELL

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK; JESSICA S. TISCH, TAREK A.
RAHMAN, EDWARD A. THOMPSON, JOSEPH A.
DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T.
JACKSON, JEFFREY K. ARCEO, DETECTIVES
ENDOWMENT ASSOCIATION POLICE DEPARTMENT,
CITY OF NEW YORK INC., and SCOTT D. MUNRO

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 New York 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, plaintiff designates New York County as the place of trial, and all material acts and omissions giving rise to this action occurred in New York County.

Venue is proper in New York County because all material events and omissions giving rise to this action occurred in New York County, including the reported sexual assault inside One Police Plaza, the alleged Department database access, the Internal Affairs investigation, the Department interview, the preparation, approval, issuance, and prosecution of Charges and Specifications, the thirty-day suspension without pay, and the NYPD supervisory, disciplinary, personnel, payroll, Department Advocate, Legal Bureau, Police Commissioner, and union-representational acts and omissions challenged herein.

Venue is also proper because the challenged employment consequences alleged herein arise from, relate back to, and were caused by New York County-based investigative, disciplinary, supervisory, administrative, union-representational, and employment-related acts and omissions involving defendants THE CITY OF NEW YORK, JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO.

Plaintiff resides in Rockland County, State of New York. Venue is not designated based upon plaintiff's residence, but upon CPLR § 504(3), defendant THE CITY OF NEW YORK's status as a party, the occurrence of all material acts and omissions in New York County, and the New York County-based employment, disciplinary, and representational consequences alleged herein.

Venue is further proper because the injuries, damages, and employment consequences alleged herein were caused by defendants' New York County-based allegations, investigation, disciplinary charges, suspension authority, employment decision-making, and union-representational acts and omissions, resulting in loss of salary, overtime, benefits, accruals, assignments, standing, reputation, career opportunities, and other terms, conditions, and privileges of employment.

Dated: June 20, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DAVID R. TERRELL

THE SANDERS FIRM, P.C.
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DEFENDANT ADDRESSES

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

JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON and JEFFREY K. ARCEO
c/o New York City Police Department
Legal Bureau
One Police Plaza
New York, N.Y. 10038

DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF
NEW YORK INC., and SCOTT D. MUNRO
26 Thomas Street
New York, NY 10007

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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DAVID R. TERRELL

Plaintiff,

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Verified Complaint

Index No.

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THE CITY OF NEW YORK; JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO

Defendants
-----X

Plaintiff DAVID R. TERRELL, by his attorney THE SANDERS FIRM, P.C., complaining of defendants THE CITY OF NEW YORK; JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO, alleges as follows:

INTRODUCTION

This action challenges defendants' discriminatory, retaliatory, arbitrary, and unlawful use of the NYPD disciplinary process against plaintiff DAVID R. TERRELL, a retired NYPD Detective 2nd Grade who self-identifies as Black and/or African-American.

Defendants targeted plaintiff after associating him with Salvatore J. Greco and The Sal Greco Show, a public-facing podcast that reports on NYPD management, police corruption,

disciplinary abuse, retaliation, union failures, public-integrity failures, and other matters of public concern.

The disciplinary theory centered on a reported sexual assault inside One Police Plaza, NYPD headquarters. Defendants treated that reported sexual assault not as a serious Department-related event, but as the predicate for an alleged leak investigation aimed at plaintiff and others perceived to be connected to Mr. Greco and The Sal Greco Show.

Defendants EDWARD A. THOMPSON and JOSEPH A. DIBARTOLOMEO used Internal Affairs Bureau Group 1 investigators defendants KENNETH J. HARSCH, ANDREW T. JACKSON and JEFFREY K. ARCEO to investigate alleged leaks concerning the reported sexual assault. Defendants HARSCH, JACKSON and ARCEO allowed themselves to be used as proxies to discriminate and retaliate against plaintiff, including through a several-hour interview during which they repeatedly stopped questioning to consult with defendant THOMPSON.

Defendant THOMPSON had been selected by defendant JESSICA S. TISCH to restore confidence, impose accountability, and clean up dysfunction inside the Internal Affairs Bureau. Instead, defendant THOMPSON abused that authority by directing, shaping, or influencing a pretextual investigation against plaintiff based on perceived association, institutional embarrassment, and retaliation.

Defendants served plaintiff with Charges and Specifications under CHIA No. 2026-986 / IAB Log No. 2026-11051 and imposed a thirty-day suspension without pay. Plaintiff filed a written response demanding dismissal, rescission of the suspension, restoration of lost compensation and benefits, and expungement. Defendants TISCH and TAREK A. RAHMAN never answered plaintiff's response, never meaningfully addressed his factual and legal

objections, never conducted a department trial, never obtained a plea, never obtained a finding of guilt, and never obtained a final disciplinary or judicial finding establishing misconduct.

During this same period, defendant SCOTT D. MUNRO, a Detective First Grade assigned to Auto Crime and acting on union release time for defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., met with defendant TISCH on several occasions concerning plaintiff and the challenged disciplinary action. Defendant TISCH admitted, in substance, that she did not know defendant THOMPSON was going to take the challenged action against plaintiff, and stated, in substance, that she “hated” plaintiff’s attorney, Eric Sanders, Salvatore J. Greco, and The Sal Greco Show.

Those statements placed defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. on actual notice that plaintiff’s discipline was infected by retaliatory animus, attorney-related hostility, perceived-association hostility, and hostility toward public reporting concerning NYPD misconduct. Despite that notice, they failed to protect plaintiff or take reasonable corrective action.

After plaintiff retired, defendants continued treating unresolved and unproven allegations as proven misconduct. Defendants denied plaintiff a Good Guy Letter or its NYPD equivalent, failed to issue or provide an unrestricted retired identification card, seized or withheld terminal leave and other earned benefits, impaired plaintiff’s ability to obtain or maintain handgun-related authorization, and damaged plaintiff’s post-retirement employment opportunities, reputation, retirement-related standing, and economic interests.

Defendants’ conduct affected plaintiff’s salary, overtime, terminal leave, benefits, accruals, disciplinary standing, retirement-related interests, retired credentials, firearm-related

opportunities, reputation, post-retirement employment opportunities, and other terms, conditions, and privileges of employment.

Defendants' conduct violated the New York State Human Rights Law, Executive Law § 290 et seq., including Executive Law §§ 296(1), 296(6), and 296(7), and the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq., including Administrative Code §§ 8-107(1)(a), 8-107(6), 8-107(7), and 8-107(19).

Plaintiff brings this action to recover damages, restore lost salary, overtime, terminal leave, accrued time, benefits, and retirement-related compensation, correct and expunge personnel, disciplinary, and retirement-related records, remedy post-retirement credentialing, firearm-related, reputational, and employment consequences, and obtain all declaratory, equitable, injunctive, monetary, and other relief necessary to make him whole.

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., the New York Labor Law, CPLR § 3001, and the common law and equitable powers of the State of New York.

2. This Court has personal jurisdiction over defendants THE CITY OF NEW YORK, JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO because defendants reside in, are employed in, transact

business in, exercise official or representative authority in, and/or committed acts or omissions within the State of New York.

3. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York.

4. Defendants JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON and JEFFREY K. ARCEO are sued in their official and individual capacities.

5. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. is a labor organization representing NYPD detectives and, at all relevant times, acted as plaintiff's representative, agent, employer, joint employer, and/or entity exercising authority, influence, or control over plaintiff's terms, conditions, privileges, and protections of employment within the meaning of the New York State Human Rights Law and the New York City Human Rights Law.

6. Defendant SCOTT D. MUNRO is a Detective First Grade employed by defendant THE CITY OF NEW YORK and the NYPD, assigned to Auto Crime, and is sued in his individual capacity and in his capacities as an NYPD Detective First Grade and as an officer, representative, employee, agent, or decisionmaker of defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

7. At all relevant times, defendant MUNRO was assigned to union release time, performed union-related functions for defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and remained an NYPD Detective First Grade and employee of defendant THE CITY OF NEW YORK.

8. Venue is designated in New York 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, plaintiff designates New York County as the place of trial, and all material acts and omissions giving rise to this action occurred in New York County.

9. Venue is proper in New York County because the material events and omissions giving rise to this action occurred in New York County, including the reported sexual assault inside One Police Plaza, the alleged Department database access, the Internal Affairs investigation, the Department interview, the preparation, approval, issuance, and prosecution of Charges and Specifications, the thirty-day suspension without pay, and the NYPD disciplinary, supervisory, administrative, employment, and union-representational acts and omissions challenged herein.

10. Plaintiff resides in Rockland County, State of New York. Venue is not designated based upon plaintiff's residence, but upon CPLR § 504(3), defendant THE CITY OF NEW YORK's status as a party, and the occurrence of all material acts and omissions in New York County.

11. Venue is further proper because defendants' New York County-based acts and omissions caused plaintiff to suffer loss of salary, overtime, benefits, accruals, disciplinary standing, retirement-related interests, reputation, post-retirement employment opportunities, and other terms, conditions, and privileges of employment.

PROCEDURAL REQUIREMENTS

12. Plaintiff has satisfied, performed, or been excused from all condition's precedent to the commencement of this action.

13. Plaintiff's claims arise from defendants' retaliatory, discriminatory, arbitrary, and unlawful employment practices, disciplinary actions, union-representational acts and omissions, post-retirement consequences, and related conduct occurring within the City and State of New York.

14. Plaintiff alleges that defendants retaliated against him because of his perceived affiliation with Salvatore J. Greco and The Sal Greco Show, his alleged inquiry into or verification of a reported sexual assault inside One Police Plaza, his association with plaintiff's counsel, and his opposition to or perceived opposition to unlawful workplace practices, sexual misconduct, retaliation, concealment, and public-integrity failures.

15. Plaintiff further alleges that defendants used an incomplete, pretextual, and retaliatory investigation to impose and sustain discipline without competent proof of misconduct, including without identifying the specific confidential information allegedly disseminated and without interviewing Salvatore J. Greco, the alleged recipient and central witness.

16. Plaintiff seeks monetary, declaratory, equitable, and injunctive relief, including but not limited to rescission and expungement of the retaliatory discipline, restoration of lost salary, overtime, benefits, accruals, seniority, disciplinary standing, retirement-related interests, correction of personnel, disciplinary, and retirement-related records, damages for reputational harm, emotional distress, post-retirement employment harm, attorneys' fees, costs, interest, and all other relief this Court deems just and proper.

PLAINTIFF

17. Plaintiff DAVID R. TERRELL is a retired NYPD Detective 2nd Grade.

18. Plaintiff self-identifies as Black and/or African-American.

19. Plaintiff resides in Rockland County, State of New York.

20. Plaintiff entered the NYPD on or about July 1, 2002.
21. During his NYPD career, plaintiff served as a member of the service and was later promoted to Detective.
22. Plaintiff ultimately attained the rank-title of Detective 2nd Grade.
23. At relevant times before his retirement, plaintiff was assigned to the Manhattan Court Section.
24. Defendants served or maintained Charges and Specifications against plaintiff under CHIA No. 2026-986 / IAB Log No. 2026-11051.
25. Plaintiff filed a written response to the Charges and Specifications on or about April 27, 2026.
26. Defendants never answered, addressed, adjudicated, or otherwise issued a determination concerning plaintiff's written response.
27. Defendants never conducted a department trial on the Charges and Specifications.
28. Defendants never obtained a finding of guilt against plaintiff.
29. Defendants never obtained a plea from plaintiff.
30. Defendants never obtained a final disciplinary adjudication establishing misconduct by plaintiff.
31. Before plaintiff's retirement became effective, defendants imposed a thirty-day suspension without pay upon plaintiff.
32. Plaintiff filed for retirement on or about April 23, 2026.
33. Plaintiff's retirement became effective on or about May 26, 2026.
34. Plaintiff retired from the NYPD as a Detective 2nd Grade.

35. Defendants' retaliatory and discriminatory acts and omissions affected plaintiff's salary, overtime, benefits, accruals, seniority, disciplinary standing, retirement-related interests, personnel records, disciplinary records, reputation, post-retirement employment opportunities, and other terms, conditions, and privileges of employment.

36. Plaintiff is an aggrieved person within the meaning of the New York State Human Rights Law and the New York City Human Rights Law.

37. Plaintiff has suffered economic loss, lost salary, lost overtime, lost benefits, lost accruals, reputational harm, emotional distress, disciplinary-record harm, retirement-related harm, post-retirement employment harm, attorneys' fees, costs, and other damages as a result of defendants' retaliatory, discriminatory, arbitrary, and unlawful conduct.

DEFENDANTS

38. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York.

39. Defendant THE CITY OF NEW YORK operates the New York City Police Department and is sued because the challenged acts and omissions were committed, approved, ratified, enforced, continued, or permitted by NYPD officials, employees, agents, and decisionmakers acting within the scope of NYPD authority.

40. Defendant JESSICA S. TISCH is the Police Commissioner of the City of New York and the NYPD and is sued in her official and individual capacities.

41. Defendant TISCH possessed supervisory, administrative, disciplinary, policymaking, personnel, corrective, and final decision-making authority over NYPD discipline, Internal Affairs investigations, Department Advocate prosecutions, suspension practices,

retaliation prevention, personnel records, retirement-related consequences, and related NYPD practices.

42. Defendant TAREK A. RAHMAN is the Deputy Commissioner Department Advocate of the NYPD and is sued in his official and individual capacities.

43. Defendant RAHMAN possessed supervisory, administrative, disciplinary, prosecutorial, and corrective authority over NYPD Charges and Specifications, Department Advocate proceedings, disciplinary prosecutions, disciplinary recommendations, dismissal authority, and related employment consequences.

44. Defendant EDWARD A. THOMPSON is an NYPD supervisory, command, Internal Affairs, disciplinary, personnel, or administrative decisionmaker and is sued in his official and individual capacities.

45. Defendant JOSEPH A. DIBARTOLOMEO is an NYPD supervisory, command, Internal Affairs, disciplinary, personnel, or administrative decisionmaker and is sued in his official and individual capacities.

46. Defendants THOMPSON and DIBARTOLOMEO used, directed, approved, authorized, ratified, maintained, enforced, continued, or failed to correct the investigation and disciplinary process used against plaintiff.

47. Defendant KENNETH J. HARSCH is an NYPD Internal Affairs Bureau Group 1 investigator, supervisor, command officer, disciplinary investigator, or administrative decisionmaker and is sued in his official and individual capacities.

48. Defendant ANDREW T. JACKSON is an NYPD Internal Affairs Bureau Group 1 investigator, supervisor, command officer, disciplinary investigator, or administrative decisionmaker and is sued in his official and individual capacities

49. Defendant JEFFREY K. ARCEO is an NYPD Internal Affairs Bureau Group 1 investigator, supervisor, command officer, disciplinary investigator, or administrative decisionmaker and is sued in his official and individual capacities.

50. Defendants HARSCH, JACKSON and ARCEO participated in, supervised, approved, directed, reviewed, maintained, or ratified the Internal Affairs investigation of plaintiff and the disciplinary theory used to impose or support the challenged adverse actions.

51. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. is a labor organization representing NYPD detectives and, at all relevant times, acted as plaintiff's representative, agent, employer, joint employer, and/or entity exercising authority, influence, or control over plaintiff's terms, conditions, privileges, and protections of employment within the meaning of the New York State Human Rights Law and the New York City Human Rights Law.

52. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. exercised authority, influence, and control over plaintiff's disciplinary defense, union representation, grievance rights, contractual rights, salary-related protections, benefits, accruals, retirement-related interests, post-retirement consequences, and related terms, conditions, and privileges of employment.

53. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. is liable because it participated in, aided and abetted, permitted, acquiesced in, ratified, failed to prevent, or failed to correct discriminatory and retaliatory conduct affecting plaintiff's employment, discipline, representation, retirement-related interests, and post-retirement consequences.

54. Defendant SCOTT D. MUNRO is a Detective First Grade employed by defendant THE CITY OF NEW YORK and the NYPD, assigned to Auto Crime, and was also acting on union release time for defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

55. At all relevant times, defendant MUNRO acted in a dual capacity: as an NYPD Detective First Grade and City employee, and as an officer, representative, employee, agent, or decisionmaker of defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

56. Defendant MUNRO's acts and omissions are attributable to defendant THE CITY OF NEW YORK because he remained an NYPD employee while on union release time, and are also attributable to defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. because he acted within the scope of his union authority and representational role.

57. Defendants DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. and MUNRO failed to take reasonable and available steps to protect plaintiff from retaliatory, discriminatory, arbitrary, and legally defective discipline after receiving actual notice of retaliatory animus and irregular disciplinary conduct.

58. Defendants TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON, ARCEO, and MUNRO are sued because they personally participated in, aided and abetted, approved, ratified, maintained, enforced, continued, permitted, acquiesced in, or failed to correct the unlawful conduct alleged herein.

59. At all relevant times, defendants TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON and ARCEO acted within the scope of their employment and/or with actual or apparent authority derived from their positions with defendant THE CITY OF NEW YORK and the NYPD.

60. At all relevant times, defendant MUNRO acted within the scope of his City employment, NYPD title, union release-time status, union-representational role, agency authority, and/or apparent authority on behalf of defendant THE CITY OF NEW YORK, the NYPD, and defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

61. At all relevant times, defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. acted through its officers, representatives, employees, agents, and decisionmakers, including defendant MUNRO.

BACKGROUND

A. Salvatore J. Greco, The Sal Greco Show, and NYPD's Retaliatory Focus on Perceived Association

62. Salvatore J. Greco is a former NYPD officer, public commentator, and media figure associated with The Sal Greco Show.

63. The Sal Greco Show is a public-facing podcast and media platform that reports on NYPD management, police corruption, internal Department misconduct, disciplinary abuse, retaliation, union failures, public-integrity failures, and other matters of public concern.

64. Mr. Greco has pending federal litigation against THE CITY OF NEW YORK and NYPD-related defendants in the United States District Court for the Eastern District of New York, captioned Salvatore J. Greco v. The City of New York et al., Case No. 22-cv-5109.

65. In that federal litigation, Mr. Greco alleges that the City and NYPD officials investigated, disciplined, and terminated him because of his personal, familial, and political associations with Roger Jason Stone, Jr. Kristin M. Davis, and others associated with Trump's America and the MAGA political movement.

66. Defendants knew of Mr. Greco, The Sal Greco Show, Mr. Greco's pending federal lawsuit, and the association-based retaliation theory alleged in that action.

67. Defendants also knew that The Sal Greco Show publicly reported on NYPD management, internal misconduct, retaliation, disciplinary abuse, public corruption, public-integrity issues, and union failures.

68. The Sal Greco Show reported on, discussed, or was positioned to report on alleged incompetence, retaliation, public corruption, and mismanagement involving defendants JESSICA S. TISCH and SCOTT D. MUNRO, other NYPD officials, and union actors responsible for protecting members from arbitrary, retaliatory, and unlawful discipline.

69. The Sal Greco Show further reported on, discussed, or was positioned to report on allegations involving high-ranking NYPD officials, including allegations concerning inappropriate sexual relationships involving defendants EDWARD A. THOMPSON and JOSEPH A. DIBARTOLOMEO and their subordinates, together with related conduct and activities.

70. Defendants did not treat Mr. Greco and The Sal Greco Show as ordinary public critics, media commentators, or members of the public commenting on government affairs.

71. Defendants treated Mr. Greco, The Sal Greco Show, and persons perceived to be associated with them as threats to NYPD leadership, Department image, union leadership, and the private interests of high-ranking NYPD and union officials.

72. Plaintiff DAVID R. TERRELL became a target because defendants associated him with Mr. Greco and The Sal Greco Show.

73. Defendants used plaintiff's perceived association with Mr. Greco and The Sal Greco Show as a retaliatory lens through which they interpreted plaintiff's alleged conduct concerning the reported sexual assault inside One Police Plaza.

74. Defendants' reaction to plaintiff was not driven by neutral enforcement of Department rules. It was driven by hostility toward public reporting, public criticism, and perceived affiliation with a media platform that exposed or threatened to expose corruption, incompetence, retaliation, sexual misconduct, disciplinary abuse, and union failure inside the NYPD.

B. The Reported Sexual Assault Inside NYPD Headquarters

75. This matter arises from a reported sexual assault inside One Police Plaza, NYPD headquarters.

76. One Police Plaza is located in New York County.

77. One Police Plaza is a City-controlled NYPD facility.

78. One Police Plaza is used by NYPD executives, uniformed members of the service, civilian employees, attorneys, visitors, vendors, detainees, and members of the public.

79. On or about January 23, 2026, Salvatore J. Greco on The Sal Greco Show publicly referenced a reported sexual assault inside One Police Plaza via several social media outlets including X.

80. The reported sexual assault concerned an incident alleged to have occurred inside NYPD headquarters.

81. The reported sexual assault was documented in a department complaint report.

82. The existence of the Department complaint report concerning the reported sexual assault later became the subject of NYPD internal review.

83. The reported sexual assault and the existence of the related Department complaint report became the factual predicate for the alleged leak investigation later used by defendants.

C. The Pretext IAB Investigation Into the Reported Sexual Assault Inside NYPD Headquarters

84. After the reported sexual assault inside One Police Plaza became publicly referenced, defendants shifted the focus from the reported sexual assault to alleged leaks concerning the incident.

85. Defendant JESSICA S. TISCH selected defendant EDWARD A. THOMPSON for a senior Internal Affairs role to restore confidence, impose accountability, and clean up dysfunction inside the Internal Affairs Bureau.

86. Defendant THOMPSON was therefore placed in a position of heightened trust, authority, and responsibility over internal investigations involving NYPD integrity, misconduct, leaks, discipline, and public confidence.

87. Defendant THOMPSON abused that authority.

88. Rather than use his Internal Affairs authority to conduct a neutral, competent, and integrity-driven investigation, defendant THOMPSON used that authority to retaliate against plaintiff because of plaintiff's perceived affiliation with Salvatore J. Greco and The Sal Greco Show.

89. Defendant THOMPSON, acting with defendant JOSEPH A. DIBARTOLOMEO, used Internal Affairs Bureau Group 1 investigators defendants KENNETH J. HARSCH, JACKSON and JEFFREY K. ARCEO to investigate alleged leaks concerning the reported sexual assault.

90. Defendants HARSCH, JACKSON and ARCEO allowed themselves to be unlawfully used as proxies to discriminate and retaliate against plaintiff.

91. Defendants HARSCH, JACKSON and ARCEO did not conduct a neutral, independent, or detached investigation.

92. Instead, defendants HARSCH, JACKSON and ARCEO acted as investigative instruments for defendants THOMPSON and DIBARTOLOMEO, who had personal, institutional, and retaliatory reasons to identify and punish persons perceived to be affiliated with Mr. Greco and The Sal Greco Show.

93. Defendants knew The Sal Greco Show publicly reported on NYPD corruption, incompetence, retaliation, disciplinary abuse, sexual misconduct, union failures, and other public-interest matters.

94. Defendants also knew The Sal Greco Show reported on, discussed, or was positioned to report on allegations concerning inappropriate sexual relationships involving defendants THOMPSON and DIBARTOLOMEO and their subordinates, together with related conduct and activities.

95. Defendants therefore had a motive to suppress, control, or punish perceived communications with Mr. Greco and The Sal Greco Show.

96. During the IAB investigation, defendants HARSCH, JACKSON and ARCEO interviewed plaintiff concerning the reported sexual assault, the alleged leak theory, and plaintiff's alleged communications or perceived association with Mr. Greco and The Sal Greco Show.

97. The interview occurred over the course of several hours.

98. During the interview, defendants HARSCH, JACKSON and ARCEO repeatedly stopped the questioning to consult with defendant THOMPSON.

99. Those repeated interruptions showed that defendants HARSCH, JACKSON and ARCEO were not independently investigating plaintiff.

100. They were coordinating the interrogation with defendant THOMPSON while the interview was ongoing.

101. Defendant THOMPSON's real-time involvement confirmed that the investigation was being directed, shaped, or influenced by the very official who was supposed to restore integrity to Internal Affairs, but instead used that authority to advance retaliation.

102. Defendants HARSCH, JACKSON and ARCEO adopted that unlawful objective by continuing the interrogation, shaping the questioning around plaintiff's perceived association with Mr. Greco and The Sal Greco Show, and failing to correct or disengage from the retaliatory purpose of the investigation.

103. Defendants HARSCH, JACKSON and ARCEO failed to identify the specific confidential or non-public information plaintiff allegedly disseminated.

104. Defendants HARSCH, JACKSON and ARCEO failed to produce competent evidence that plaintiff disclosed confidential or non-public information.

105. Defendants HARSCH, JACKSON and ARCEO failed to interview Salvatore J. Greco, the alleged recipient and central witness to the alleged leak theory.

106. The failure to interview Mr. Greco was a material investigative omission.

107. A competent investigation into an alleged disclosure to Mr. Greco would have interviewed Mr. Greco.

108. Defendants' failure to do so preserved their preferred inference while avoiding the witness most capable of confirming, denying, or explaining whether any disclosure occurred.

109. At the conclusion of the several-hour interview, defendants suspended plaintiff.

110. The suspension was not the product of a completed, neutral, or reliable investigation.

111. The suspension was the product of a pretextual process driven by perceived association, institutional embarrassment, discrimination, and retaliation.

112. Defendants used the IAB investigation to create the appearance of process while avoiding the proof necessary to sustain a legitimate disciplinary case.

113. The pretextual IAB investigation became the foundation for the suspension, Charges and Specifications, defendants' failure to answer plaintiff's written response, defendants' failure to conduct a Department trial, defendants' failure to obtain a finding of guilt, and the post-retirement punishment imposed upon plaintiff.

D. Post-Investigation Retaliation, Unanswered Response, Union Notice, and Failure to Conduct a Department Trial

114. After the IAB interview, defendants served plaintiff with Charges and Specifications under CHIA No. 2026-986 / IAB Log No. 2026-11051.

115. The Charges and Specifications alleged, in substance, that plaintiff wrongfully accessed Department databases for an unofficial or non-Department-related purpose, wrongfully disseminated confidential or non-public information, and made false, inaccurate, or misleading statements during the Department interview.

116. Defendants imposed a thirty-day suspension without pay upon plaintiff.

117. On or about April 27, 2026, plaintiff, through counsel, served defendant TAREK A. RAHMAN, Deputy Commissioner Department Advocate, with a written response and demand for dismissal.

118. Plaintiff's written response demanded dismissal of the Charges and Specifications with prejudice, rescission of the thirty-day suspension without pay, full back pay, restoration of lost salary, overtime, benefits, accruals, seniority, assignments, and standing, and expungement of all references to the investigation, suspension, and charges from Department records.

119. Plaintiff's written response specifically challenged the Department's failure to prove dissemination.

120. Plaintiff's written response specifically challenged the Department's failure to identify the confidential or non-public information plaintiff allegedly disclosed.

121. Plaintiff's written response specifically challenged the absence of any text message, email, transmission, recording, recipient confirmation, or competent witness statement proving disclosure.

122. Plaintiff's written response specifically challenged the Department's failure to interview Salvatore J. Greco, the alleged recipient and central witness to the Department's dissemination theory.

123. Plaintiff's written response further challenged the Department's false characterization of a reported sexual assault inside One Police Plaza as a non-Department-related matter.

124. Defendants RAHMAN and TISCH did not answer plaintiff's written response.

125. Defendants RAHMAN and TISCH did not meaningfully address plaintiff's factual, legal, or evidentiary objections.

126. Defendants RAHMAN and TISCH did not dismiss the Charges and Specifications.

127. Defendants RAHMAN and TISCH did not rescind the thirty-day suspension without pay.

128. Defendants RAHMAN and TISCH did not restore plaintiff's lost salary, overtime, benefits, accruals, seniority, assignments, or standing.

129. Defendants RAHMAN and TISCH did not expunge the investigation, suspension, or charges from plaintiff's Department records.

130. Defendant TISCH possessed supervisory, administrative, disciplinary, corrective, and final decision-making authority over NYPD discipline, Department Advocate prosecutions, suspension practices, personnel records, and post-retirement consequences.

131. Defendant TISCH's failure to answer, correct, rescind, or require meaningful review of plaintiff's written response ratified the retaliatory and defective disciplinary process.

132. During this same period, defendant SCOTT D. MUNRO, a Detective First Grade assigned to Auto Crime and acting on union release time for defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., met with defendant TISCH on several occasions concerning plaintiff and the challenged disciplinary action.

133. Defendant MUNRO remained an employee of defendant THE CITY OF NEW YORK and the NYPD while also acting as an officer, representative, employee, agent, or decisionmaker of defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

134. During one or more of those meetings, defendant TISCH admitted, in substance, that she did not know defendant EDWARD A. THOMPSON was going to take the challenged action against plaintiff.

135. Defendant TISCH's admission placed defendant MUNRO and defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. on actual notice that plaintiff's discipline was irregular, retaliatory, and not the product of a transparent, orderly, fully informed, or neutral disciplinary process.

136. During one or more of those meetings, defendant TISCH also stated, in substance, that she "hated" plaintiff's attorney, Eric Sanders, Salvatore J. Greco, and The Sal Greco Show.

137. Defendant TISCH's statement placed defendant MUNRO and defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. on actual notice that plaintiff's discipline was infected by retaliatory animus, attorney-related hostility, perceived-association hostility, and hostility toward public criticism of NYPD management.

138. Despite that actual notice, defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. failed to take reasonable and available steps to protect plaintiff.

139. Defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. failed to demand that defendant TISCH answer plaintiff's written response.

140. Defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. failed to demand rescission of the thirty-day suspension without pay.

141. Defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. failed to demand dismissal of the Charges and Specifications.

142. Defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. failed to adequately challenge defendant THOMPSON's role in the retaliatory investigation and suspension.

143. Defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. failed to adequately challenge the Department's failure to identify the specific confidential or non-public information allegedly disseminated.

144. Defendants MUNRO and DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. failed to adequately challenge the Department's failure to interview Mr. Greco.

145. Defendants never scheduled plaintiff for a department trial before plaintiff's retirement became effective.

146. Defendants never conducted a department trial.

147. Defendants never obtained a plea from plaintiff.

148. Defendants never obtained a finding of guilt against plaintiff.

149. Defendants never obtained a final disciplinary adjudication establishing misconduct.

150. Defendants nevertheless continued to treat the unresolved and unproven Charges and Specifications as if they were adjudicated misconduct.

151. Defendants' failure to answer plaintiff's written response, failure to conduct a department trial, failure to obtain a finding of guilt, and continued reliance on unproven allegations confirm that the disciplinary process was used as punishment rather than adjudication.

152. Defendants' post-investigation conduct damaged plaintiff's salary, overtime, benefits, accruals, seniority, disciplinary standing, retirement-related interests, personnel records, disciplinary records, reputation, post-retirement employment opportunities, and other terms, conditions, and privileges of employment.

E. The Consequences of Defendants' Inaction and Continued Reliance on Unproven Allegations

153. Defendants THE CITY OF NEW YORK, JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO's inaction was not harmless.

154. Defendants THE CITY OF NEW YORK, TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON and ARCEO failed to answer plaintiff's written response, failed to rescind the suspension, failed to dismiss the Charges and Specifications, failed to conduct a department trial, and allowed unresolved and unproven allegations to remain in plaintiff's disciplinary and personnel records.

155. Defendants DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. and MUNRO failed to protect plaintiff from those consequences despite actual notice that the disciplinary process was infected by retaliatory animus, irregularity, and lack of proof.

156. Defendants never obtained a plea from plaintiff.
157. Defendants never obtained a finding of guilt against plaintiff.
158. Defendants never obtained a final disciplinary adjudication establishing misconduct.
159. Defendants never obtained a judicial finding establishing misconduct.
160. Defendants nevertheless treated the unresolved Charges and Specifications as if they were proven misconduct.
161. After plaintiff retired, defendants THE CITY OF NEW YORK, TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON and ARCEO used, approved, ratified, maintained, or failed to correct the use of unresolved and unproven allegations to impose post-retirement punishment.
162. Defendants DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. and MUNRO permitted, acquiesced in, failed to oppose, failed to correct, or failed to protect plaintiff from that post-retirement punishment.
163. Defendants denied plaintiff a Good Guy Letter or its NYPD equivalent.
164. Defendants failed to issue, provide, or permit plaintiff to maintain an unrestricted retired identification card.
165. Defendants seized, withheld, forfeited, or otherwise failed to pay plaintiff's terminal leave.
166. Defendants seized, withheld, forfeited, or otherwise failed to pay plaintiff's earned benefits, accrued time, and related retirement compensation.
167. Defendants' actions impaired plaintiff's ability to obtain or maintain handgun-related authorization, including authorization necessary to pursue or maintain a handgun license.

168. Defendants' actions impaired plaintiff's ability to obtain post-retirement employment in security, investigative, law-enforcement-adjacent, and other positions for which retired NYPD credentials, a Good Guy Letter, retired identification, and firearm-related authorization are material qualifications.

169. Defendants' actions damaged plaintiff's retirement-related standing.

170. Defendants' actions damaged plaintiff's professional reputation.

171. Defendants' actions damaged plaintiff's ability to earn income after retirement.

172. Defendants imposed, approved, ratified, maintained, permitted, or failed to correct these consequences without a department trial.

173. Defendants imposed, approved, ratified, maintained, permitted, or failed to correct these consequences without answering plaintiff's written response.

174. Defendants imposed, approved, ratified, maintained, permitted, or failed to correct these consequences without proving the Charges and Specifications.

175. Defendants imposed, approved, ratified, maintained, permitted, or failed to correct these consequences without any finding that plaintiff disseminated confidential or non-public information.

176. Defendants imposed, approved, ratified, maintained, permitted, or failed to correct these consequences without interviewing Salvatore J. Greco, the alleged recipient and central witness to the Department's disclosure theory.

177. Defendants' continued reliance on unproven allegations converted the disciplinary process into punishment by accusation.

178. Defendants' conduct was retaliatory, discriminatory, arbitrary, and unlawful.

179. Defendants' conduct caused plaintiff economic loss, loss of terminal leave, loss of earned benefits, loss of accrued time, loss of retirement-related compensation, loss of post-retirement employment opportunities, reputational harm, emotional distress, attorneys' fees, costs, and other damages.

CONCLUSION

180. Defendants THE CITY OF NEW YORK, JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO used an unproven disciplinary theory to punish plaintiff before and after retirement.

181. Defendants' conduct was not a neutral disciplinary process. It was discriminatory and retaliatory conduct based on plaintiff's race, protected activity, perceived association with Salvatore J. Greco and The Sal Greco Show, opposition to unlawful workplace practices, and defendants' hostility toward public reporting concerning NYPD misconduct.

182. Defendants' conduct affected plaintiff's salary, overtime, terminal leave, benefits, accruals, disciplinary standing, retirement-related interests, retired credentials, firearm-related opportunities, reputation, post-retirement employment opportunities, and other terms, conditions, and privileges of employment.

183. Defendants' conduct violated the New York State Human Rights Law, Executive Law § 290 et seq., including Executive Law §§ 296(1), 296(6), and 296(7).

184. Defendants' conduct also violated the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq., including Administrative Code §§ 8-107(1)(a), 8-107(6), 8-107(7), and 8-107(19).

185. Plaintiff seeks damages, equitable relief, declaratory relief, injunctive relief, attorneys' fees, costs, interest, and all other relief necessary to remedy defendants' discriminatory, retaliatory, arbitrary, and unlawful conduct.

VIOLATIONS AND CLAIMS ALLEGED

**COUNT I
New York State Human Rights Law
Executive Law §§ 296(1) and 296(6)
Race Discrimination
Against All Defendants**

185. Plaintiff DAVID R. TERRELL repeats and realleges the preceding paragraphs as if fully set forth herein.

186. Plaintiff self-identifies as Black and/or African-American.

187. Defendant THE CITY OF NEW YORK, acting through the NYPD and its officials, employees, agents, supervisors, investigators, disciplinary prosecutors, union-release employees, and decisionmakers, discriminated against plaintiff because of his race by subjecting him to a selective, pretextual, arbitrary, and unlawful disciplinary process.

188. Defendant THE CITY OF NEW YORK discriminated against plaintiff by permitting NYPD officials and employees to use unproven Charges and Specifications under CHIA No. 2026-986 / IAB Log No. 2026-11051 to impose adverse employment and post-retirement consequences upon plaintiff.

189. Defendant JESSICA S. TISCH discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by failing to correct a disciplinary process that she knew or should have known was irregular, retaliatory, unsupported by competent proof, and directed against plaintiff in a manner affecting his employment, retirement-related interests, and post-retirement opportunities.

190. Defendant TISCH further discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by failing to require a meaningful answer to plaintiff's written response, failing to require lawful adjudication of the Charges and Specifications, failing to rescind the thirty-day suspension without pay, and allowing unresolved and unproven allegations to produce post-retirement consequences.

191. Defendants THE CITY OF NEW YORK and TISCH denied plaintiff a Good Guy Letter or its NYPD equivalent, failed to issue or provide an unrestricted retired identification card, seized or withheld terminal leave and other earned benefits, impaired plaintiff's ability to obtain or maintain handgun-related authorization, damaged his post-retirement employment opportunities, and injured his reputation, retirement-related standing, and economic interests.

192. Defendant TAREK A. RAHMAN discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by failing to answer plaintiff's April 27, 2026 written response and demand for dismissal, failing to meaningfully address plaintiff's factual and legal objections, failing to dismiss the Charges and Specifications, failing to rescind the thirty-day suspension without pay, and failing to restore plaintiff's lost salary, overtime, benefits, accruals, seniority, assignments, and standing.

193. Defendant RAHMAN further discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by allowing unresolved and unproven Charges and Specifications to remain pending against plaintiff without a department trial, plea, finding of guilt, final disciplinary adjudication, or judicial finding establishing misconduct.

194. Defendant EDWARD A. THOMPSON discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by abusing the Internal Affairs authority entrusted to him, using the alleged leak investigation as a pretext, directing or

influencing the investigation, and causing plaintiff to be targeted through a selective and irregular investigative process.

195. Defendant THOMPSON further discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by coordinating, directing, shaping, approving, maintaining, or failing to correct the investigation and suspension of plaintiff despite the absence of competent proof that plaintiff disseminated confidential or non-public information.

196. Defendant JOSEPH A. DIBARTOLOMEO discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by using, directing, approving, maintaining, ratifying, or failing to correct the alleged leak investigation and disciplinary process used against plaintiff despite the absence of competent proof of dissemination, the failure to identify the specific confidential or non-public information allegedly disclosed, and the failure to interview Salvatore J. Greco.

197. Defendants KENNETH J. HARSCH, ANDREW T. JACKSON and JEFFREY K. ARCEO discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by conducting a non-neutral Internal Affairs investigation, allowing themselves to be used as investigative proxies for defendants THOMPSON and DIBARTOLOMEO, and repeatedly stopping plaintiff's several-hour interview to consult with defendant THOMPSON.

198. Defendants HARSCH, JACKSON and ARCEO further discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by failing to conduct a neutral, independent, and detached investigation; failing to identify the specific confidential or non-public information plaintiff allegedly disclosed; failing to produce competent evidence of dissemination; and failing to interview Salvatore J. Greco, the alleged recipient and central witness to the Department's dissemination theory.

199. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. discriminated against plaintiff, aided and abetted discrimination, permitted discrimination, acquiesced in discrimination, and failed to prevent or correct discrimination after receiving actual notice that plaintiff's disciplinary process was irregular, unsupported by competent proof, and infected by retaliatory animus, perceived-association hostility, attorney-related hostility, and hostility toward public reporting concerning NYPD misconduct.

200. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. further discriminated against plaintiff, aided and abetted discrimination, and permitted or acquiesced in discrimination by failing to demand that defendants TISCH and RAHMAN answer plaintiff's written response, failing to demand rescission of the thirty-day suspension without pay, failing to demand dismissal or lawful adjudication of the Charges and Specifications, failing to adequately challenge defendant THOMPSON's role, and failing to protect plaintiff from post-retirement consequences based on unresolved and unproven allegations.

201. Defendant SCOTT D. MUNRO discriminated against plaintiff, aided and abetted discrimination, permitted discrimination, acquiesced in discrimination, and failed to prevent or correct discrimination in his dual capacity as an NYPD Detective First Grade and City employee and as an officer, representative, employee, agent, or decisionmaker of defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

202. Defendant MUNRO met with defendant TISCH concerning plaintiff and the challenged disciplinary action, learned that defendant TISCH admitted, in substance, that she did not know defendant THOMPSON was going to take the challenged action against plaintiff, and

learned that defendant TISCH stated, in substance, that she “hated” plaintiff’s attorney, Eric Sanders, Salvatore J. Greco, and The Sal Greco Show.

203. Defendant MUNRO therefore had actual notice that plaintiff’s disciplinary process was irregular, retaliatory, and infected by attorney-related hostility, perceived-association hostility, and hostility toward public criticism of NYPD management.

204. Despite that actual notice, defendant MUNRO failed to take reasonable and available steps to protect plaintiff, failed to demand meaningful corrective action from defendant TISCH, failed to adequately challenge defendant THOMPSON’s role, failed to adequately challenge the lack of proof, failed to secure an answer to plaintiff’s written response, and failed to protect plaintiff from post-retirement punishment based on unresolved and unproven allegations.

205. Defendants’ conduct caused plaintiff to be treated less favorably than similarly situated non-Black and/or non-African-American employees and retirees, including with respect to investigation, discipline, suspension, adjudication, representation, retirement processing, post-retirement credentials, terminal leave, earned benefits, firearm-related authorization, and post-retirement employment consequences.

206. Defendants’ actions constituted adverse employment actions and affected plaintiff’s terms, conditions, and privileges of employment within the meaning of the New York State Human Rights Law.

207. Defendants TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON, ARCEO, and MUNRO are individually liable under Executive Law § 296(6) because they personally participated in, aided and abetted, approved, ratified, maintained,

enforced, continued, permitted, acquiesced in, or failed to correct the discriminatory conduct alleged herein.

208. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. is liable as a labor organization, employer, joint employer, agent, and/or entity exercising authority, influence, or control over plaintiff's terms, conditions, privileges, and protections of employment because it participated in, aided and abetted, permitted, acquiesced in, ratified, failed to prevent, or failed to correct discriminatory conduct affecting plaintiff's employment, discipline, representation, retirement-related interests, and post-retirement consequences.

209. Defendant MUNRO's discriminatory acts and omissions are attributable to defendant THE CITY OF NEW YORK because he remained an NYPD Detective First Grade and City employee while on union release time.

210. Defendant MUNRO's discriminatory acts and omissions are also attributable to defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. because he acted within the scope of his union authority, agency authority, release-time role, and representational duties.

211. Defendants' conduct violated the New York State Human Rights Law, Executive Law §§ 296(1) and 296(6).

212. As a direct and proximate result, plaintiff suffered economic loss, lost salary, lost overtime, lost terminal leave, lost benefits, lost accruals, loss of retirement-related compensation, reputational harm, disciplinary-record harm, retirement-related harm, post-retirement employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

COUNT II
New York State Human Rights Law
Executive Law §§ 296(7) and 296(6)
Retaliation
Against All Defendants

213. Plaintiff DAVID R. TERRELL repeats and realleges the preceding paragraphs as if fully set forth herein.

214. Plaintiff engaged in protected activity when he opposed, challenged, objected to, and refused to accept defendants' discriminatory, retaliatory, arbitrary, and unlawful use of the NYPD disciplinary process.

215. Plaintiff engaged in protected activity when, through counsel, he served a written response and demand for dismissal challenging the Charges and Specifications, the thirty-day suspension without pay, the absence of proof of dissemination, the failure to identify the specific confidential or non-public information allegedly disclosed, the failure to interview Salvatore J. Greco, and the false characterization of a reported sexual assault inside One Police Plaza as a non-Department-related matter.

216. Plaintiff further engaged in protected activity, or was perceived as engaging in protected activity, because defendants associated him with Salvatore J. Greco and The Sal Greco Show, a public-facing podcast that reported on NYPD management, police corruption, disciplinary abuse, retaliation, union failures, public-integrity failures, sexual misconduct, and other matters of public concern.

217. Defendant THE CITY OF NEW YORK, acting through NYPD officials, employees, agents, and decisionmakers, retaliated against plaintiff by allowing the Internal Affairs Bureau, the Department Advocate, and other NYPD disciplinary machinery to be used against plaintiff based on perceived association, protected opposition, and protected activity.

218. Defendant JESSICA S. TISCH retaliated against plaintiff, aided and abetted retaliation, and ratified retaliation by failing to correct the retaliatory disciplinary process after receiving notice of plaintiff's written response, the lack of proof, the failure to conduct a department trial, defendant THOMPSON's role, and the retaliatory animus connected to plaintiff's attorney, Salvatore J. Greco, and The Sal Greco Show.

219. Defendant TISCH further retaliated against plaintiff, aided and abetted retaliation, and ratified retaliation by failing to require a meaningful answer to plaintiff's written response, failing to rescind the thirty-day suspension without pay, failing to require dismissal or lawful adjudication of the Charges and Specifications, and allowing unproven allegations to generate post-retirement consequences.

220. Defendant TAREK A. RAHMAN retaliated against plaintiff, aided and abetted retaliation, and ratified retaliation by failing to answer plaintiff's April 27, 2026 written response and demand for dismissal, failing to meaningfully address plaintiff's factual and legal objections, failing to dismiss the Charges and Specifications, failing to rescind the thirty-day suspension without pay, and failing to restore plaintiff's lost salary, overtime, benefits, accruals, seniority, assignments, and standing.

221. Defendant EDWARD A. THOMPSON retaliated against plaintiff, aided and abetted retaliation, and participated in retaliation by abusing the Internal Affairs authority entrusted to him by defendant TISCH, using the alleged leak investigation as a pretext, directing or influencing the investigation, and causing plaintiff to be targeted because of plaintiff's perceived association with Salvatore J. Greco and The Sal Greco Show.

222. Defendant JOSEPH A. DIBARTOLOMEO retaliated against plaintiff, aided and abetted retaliation, and participated in retaliation by using, directing, approving, maintaining, or

failing to correct the alleged leak investigation and disciplinary process used against plaintiff despite the absence of competent proof of dissemination and the failure to interview Mr. Greco.

223. Defendants KENNETH J. HARSCH, ANDREW T. JACKSON and JEFFREY K. ARCEO retaliated against plaintiff, aided and abetted retaliation, and participated in retaliation by allowing themselves to be used as investigative proxies for defendants THOMPSON and DIBARTOLOMEO, conducting a several-hour interview of plaintiff, repeatedly stopping the interview to consult with defendant THOMPSON, failing to conduct an independent and neutral investigation, and failing to identify competent proof that plaintiff disclosed confidential or non-public information.

224. Defendants HARSCH, JACKSON and ARCEO further retaliated against plaintiff, aided and abetted retaliation, and participated in retaliation by failing to interview Salvatore J. Greco, the alleged recipient and central witness to the Department's dissemination theory, while continuing to support a disciplinary theory based on timing, perceived association, and inference.

225. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. retaliated against plaintiff, aided and abetted retaliation, and permitted or acquiesced in retaliation by failing to protect plaintiff after receiving actual notice that the disciplinary process was infected by retaliatory animus, irregularity, and lack of proof.

226. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. further retaliated against plaintiff, aided and abetted retaliation, and permitted or acquiesced in retaliation by failing to demand that defendants TISCH and RAHMAN answer plaintiff's written response, failing to demand rescission of the thirty-day suspension without pay, failing to demand dismissal of the Charges

and Specifications, and failing to protect plaintiff from the continued use of unresolved and unproven allegations.

227. Defendant SCOTT D. MUNRO retaliated against plaintiff, aided and abetted retaliation, and permitted or acquiesced in retaliation in his dual capacity as an NYPD Detective First Grade and City employee and as an officer, representative, employee, agent, or decisionmaker of defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

228. Defendant MUNRO met with defendant TISCH concerning plaintiff and the challenged disciplinary action, learned that defendant TISCH admitted, in substance, that she did not know defendant THOMPSON was going to take the challenged action against plaintiff, and learned that defendant TISCH stated, in substance, that she “hated” plaintiff’s attorney, Eric Sanders, Salvatore J. Greco, and The Sal Greco Show.

229. Defendant MUNRO therefore had actual notice that plaintiff’s discipline was infected by retaliatory animus, perceived-association hostility, attorney-related hostility, and hostility toward public criticism of NYPD management.

230. Despite that actual notice, defendant MUNRO failed to take reasonable and available steps to protect plaintiff, failed to demand meaningful corrective action from defendant TISCH, failed to adequately challenge defendant THOMPSON’s role, failed to adequately challenge the lack of proof, failed to secure an answer to plaintiff’s written response, and failed to protect plaintiff from post-retirement punishment based on unresolved and unproven allegations.

231. After plaintiff engaged in protected activity and after defendants perceived plaintiff as associated with Salvatore J. Greco and The Sal Greco Show, defendants imposed,

maintained, ratified, permitted, acquiesced in, or failed to correct the thirty-day suspension without pay, the Charges and Specifications, the failure to answer plaintiff's written response, the failure to conduct a department trial, and the continued use of unresolved and unproven allegations against plaintiff.

232. After plaintiff retired, defendants continued retaliating against him by treating unresolved allegations as proven misconduct, denying him a Good Guy Letter or its NYPD equivalent, failing to issue or provide an unrestricted retired identification card, seizing or withholding terminal leave and other earned benefits, impairing handgun-related authorization, and damaging his post-retirement employment opportunities.

233. Defendants' actions would reasonably deter a person from opposing discriminatory, retaliatory, arbitrary, or unlawful employment practices.

234. Defendants' actions were causally connected to plaintiff's protected activity, perceived protected activity, perceived association with Salvatore J. Greco and The Sal Greco Show, and opposition to defendants' discriminatory and retaliatory disciplinary practices.

235. Defendants TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON, ARCEO, and MUNRO are individually liable under Executive Law § 296(6) because they personally participated in, aided and abetted, approved, ratified, maintained, enforced, continued, permitted, acquiesced in, or failed to correct the retaliatory conduct alleged herein.

236. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. is liable as a labor organization, employer, joint employer, agent, and/or entity exercising authority, influence, or control over plaintiff's terms, conditions, privileges, and protections of employment because it participated in, aided and

abetted, permitted, acquiesced in, ratified, failed to prevent, or failed to correct retaliatory conduct affecting plaintiff's employment, discipline, representation, retirement-related interests, and post-retirement consequences.

237. Defendant MUNRO's retaliatory acts and omissions are attributable to defendant THE CITY OF NEW YORK because he remained an NYPD Detective First Grade and City employee while on union release time.

238. Defendant MUNRO's retaliatory acts and omissions are also attributable to defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. because he acted within the scope of his union authority, agency authority, release-time role, and representational duties.

239. Defendants' conduct violated the New York State Human Rights Law, Executive Law §§ 296(7) and 296(6).

240. As a direct and proximate result, plaintiff suffered economic loss, lost salary, lost overtime, lost terminal leave, lost benefits, lost accruals, loss of retirement-related compensation, reputational harm, disciplinary-record harm, retirement-related harm, post-retirement employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

COUNT III
New York City Human Rights Law
Administrative Code §§ 8-107(1)(a) and 8-107(6)
Race Discrimination
Against All Defendants

241. Plaintiff DAVID R. TERRELL repeats and realleges the preceding paragraphs as if fully set forth herein.

242. Plaintiff self-identifies as Black and/or African-American.

243. Defendant THE CITY OF NEW YORK, acting through the NYPD and its officials, employees, agents, supervisors, investigators, disciplinary prosecutors, union-release employees, and decisionmakers, discriminated against plaintiff because of his race and treated him less well by subjecting him to a selective, pretextual, arbitrary, and unlawful disciplinary process.

244. Defendant THE CITY OF NEW YORK discriminated against plaintiff and treated him less well by permitting NYPD officials and employees to use unproven Charges and Specifications under CHIA No. 2026-986 / IAB Log No. 2026-11051 to impose adverse employment and post-retirement consequences upon plaintiff.

245. Defendant JESSICA S. TISCH discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by failing to correct a disciplinary process that she knew or should have known was irregular, retaliatory, unsupported by competent proof, and directed against plaintiff in a manner affecting his employment, retirement-related interests, and post-retirement opportunities.

246. Defendant TISCH further discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by failing to require a meaningful answer to plaintiff's written response, failing to require lawful adjudication of the Charges and Specifications, failing to rescind the thirty-day suspension without pay, and allowing unresolved and unproven allegations to produce post-retirement consequences.

247. Defendants THE CITY OF NEW YORK and TISCH denied plaintiff a Good Guy Letter or its NYPD equivalent, failed to issue or provide an unrestricted retired identification card, seized or withheld terminal leave and other earned benefits, impaired plaintiff's ability to

obtain or maintain handgun-related authorization, damaged his post-retirement employment opportunities, and injured his reputation, retirement-related standing, and economic interests.

248. Defendant TAREK A. RAHMAN discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by failing to answer plaintiff's April 27, 2026 written response and demand for dismissal, failing to meaningfully address plaintiff's factual and legal objections, failing to dismiss the Charges and Specifications, failing to rescind the thirty-day suspension without pay, and failing to restore plaintiff's lost salary, overtime, benefits, accruals, seniority, assignments, and standing.

249. Defendant RAHMAN further discriminated against plaintiff, aided and abetted discrimination, and ratified discrimination by allowing unresolved and unproven Charges and Specifications to remain pending against plaintiff without a department trial, plea, finding of guilt, final disciplinary adjudication, or judicial finding establishing misconduct.

250. Defendant EDWARD A. THOMPSON discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by abusing the Internal Affairs authority entrusted to him, using the alleged leak investigation as a pretext, directing or influencing the investigation, and causing plaintiff to be targeted through a selective and irregular investigative process.

251. Defendant THOMPSON further discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by coordinating, directing, shaping, approving, maintaining, or failing to correct the investigation and suspension of plaintiff despite the absence of competent proof that plaintiff disseminated confidential or non-public information.

252. Defendant JOSEPH A. DIBARTOLOMEO discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by using, directing, approving,

maintaining, ratifying, or failing to correct the alleged leak investigation and disciplinary process used against plaintiff despite the absence of competent proof of dissemination, the failure to identify the specific confidential or non-public information allegedly disclosed, and the failure to interview Salvatore J. Greco.

253. Defendants KENNETH J. HARSCH, ANDREW T. JACKSON and JEFFREY K. ARCEO discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by conducting a non-neutral Internal Affairs investigation, allowing themselves to be used as investigative proxies for defendants THOMPSON and DIBARTOLOMEO, and repeatedly stopping plaintiff's several-hour interview to consult with defendant THOMPSON.

254. Defendants HARSCH, JACKSON and ARCEO further discriminated against plaintiff, aided and abetted discrimination, and participated in discrimination by failing to conduct a neutral, independent, and detached investigation; failing to identify the specific confidential or non-public information plaintiff allegedly disclosed; failing to produce competent evidence of dissemination; and failing to interview Salvatore J. Greco, the alleged recipient and central witness to the Department's dissemination theory.

255. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. discriminated against plaintiff, aided and abetted discrimination, permitted discrimination, acquiesced in discrimination, and failed to prevent or correct discrimination after receiving actual notice that plaintiff's disciplinary process was irregular, unsupported by competent proof, and infected by retaliatory animus, perceived-association hostility, attorney-related hostility, and hostility toward public reporting concerning NYPD misconduct.

256. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. further discriminated against plaintiff, aided and abetted discrimination, and permitted or acquiesced in discrimination by failing to demand that defendants TISCH and RAHMAN answer plaintiff's written response, failing to demand rescission of the thirty-day suspension without pay, failing to demand dismissal or lawful adjudication of the Charges and Specifications, failing to adequately challenge defendant THOMPSON's role, and failing to protect plaintiff from post-retirement consequences based on unresolved and unproven allegations.

257. Defendant SCOTT D. MUNRO discriminated against plaintiff, aided and abetted discrimination, permitted discrimination, acquiesced in discrimination, and failed to prevent or correct discrimination in his dual capacity as an NYPD Detective First Grade and City employee and as an officer, representative, employee, agent, or decisionmaker of defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

258. Defendant MUNRO met with defendant TISCH concerning plaintiff and the challenged disciplinary action, learned that defendant TISCH admitted, in substance, that she did not know defendant THOMPSON was going to take the challenged action against plaintiff, and learned that defendant TISCH stated, in substance, that she "hated" plaintiff's attorney, Eric Sanders, Salvatore J. Greco, and The Sal Greco Show.

259. Defendant MUNRO therefore had actual notice that plaintiff's disciplinary process was irregular, retaliatory, and infected by attorney-related hostility, perceived-association hostility, and hostility toward public criticism of NYPD management.

260. Despite that actual notice, defendant MUNRO failed to take reasonable and available steps to protect plaintiff, failed to demand meaningful corrective action from defendant

TISCH, failed to adequately challenge defendant THOMPSON's role, failed to adequately challenge the lack of proof, failed to secure an answer to plaintiff's written response, and failed to protect plaintiff from post-retirement punishment based on unresolved and unproven allegations.

261. Defendants' conduct caused plaintiff to be treated less well and less favorably than similarly situated non-Black and/or non-African-American employees and retirees, including with respect to investigation, discipline, suspension, adjudication, representation, retirement processing, post-retirement credentials, terminal leave, earned benefits, firearm-related authorization, and post-retirement employment consequences.

262. Defendants' actions affected plaintiff's terms, conditions, and privileges of employment and caused plaintiff to be treated less well within the meaning of the New York City Human Rights Law.

263. Defendants TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON, ARCEO, and MUNRO are individually liable under Administrative Code § 8-107(6) because they personally participated in, aided, abetted, incited, compelled, coerced, approved, ratified, maintained, enforced, continued, permitted, acquiesced in, or failed to correct the discriminatory conduct alleged herein.

264. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. is liable as a labor organization, employer, joint employer, agent, and/or entity exercising authority, influence, or control over plaintiff's terms, conditions, privileges, and protections of employment because it participated in, aided, abetted, incited, compelled, coerced, permitted, acquiesced in, ratified, failed to prevent, or failed to

correct discriminatory conduct affecting plaintiff's employment, discipline, representation, retirement-related interests, and post-retirement consequences.

265. Defendant MUNRO's discriminatory acts and omissions are attributable to defendant THE CITY OF NEW YORK because he remained an NYPD Detective First Grade and City employee while on union release time.

266. Defendant MUNRO's discriminatory acts and omissions are also attributable to defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. because he acted within the scope of his union authority, agency authority, release-time role, and representational duties.

267. Defendants' conduct violated the New York City Human Rights Law, Administrative Code §§ 8-107(1)(a) and 8-107(6).

268. As a direct and proximate result, plaintiff suffered economic loss, lost salary, lost overtime, lost terminal leave, lost benefits, lost accruals, loss of retirement-related compensation, reputational harm, disciplinary-record harm, retirement-related harm, post-retirement employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

COUNT IV
New York City Human Rights Law
Administrative Code §§ 8-107(7), 8-107(19), and 8-107(6)
Retaliation and Interference
Against All Defendants

269. Plaintiff DAVID R. TERRELL repeats and realleges the preceding paragraphs as if fully set forth herein.

270. Plaintiff engaged in protected activity when he opposed, challenged, objected to, and refused to accept defendants' discriminatory, retaliatory, arbitrary, and unlawful use of the NYPD disciplinary process.

271. Plaintiff engaged in protected activity when, through counsel, he served a written response and demand for dismissal challenging the Charges and Specifications, the thirty-day suspension without pay, the absence of proof of dissemination, the failure to identify the specific confidential or non-public information allegedly disclosed, the failure to interview Salvatore J. Greco, and the false characterization of a reported sexual assault inside One Police Plaza as a non-Department-related matter.

272. Plaintiff further engaged in protected activity, or was perceived as engaging in protected activity, because defendants associated him with Salvatore J. Greco and The Sal Greco Show, a public-facing podcast that reported on NYPD management, police corruption, disciplinary abuse, retaliation, union failures, public-integrity failures, sexual misconduct, and other matters of public concern.

273. Defendants knew or should have known that plaintiff opposed, challenged, or was perceived as opposing unlawful employment practices, retaliation, discrimination, sexual misconduct, workplace misconduct, concealment, and public-integrity failures.

274. Defendant THE CITY OF NEW YORK, acting through NYPD officials, employees, agents, and decisionmakers, retaliated against plaintiff and interfered with plaintiff's rights by allowing the Internal Affairs Bureau, the Department Advocate, and other NYPD disciplinary machinery to be used against plaintiff based on perceived association, protected opposition, and protected activity.

275. Defendant JESSICA S. TISCH retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and ratified retaliation by failing to correct the retaliatory disciplinary process after receiving notice of plaintiff's written response, the lack of

proof, the failure to conduct a department trial, defendant THOMPSON's role, and the retaliatory animus connected to plaintiff's attorney, Salvatore J. Greco, and The Sal Greco Show.

276. Defendant TISCH further retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and ratified retaliation by failing to require a meaningful answer to plaintiff's written response, failing to rescind the thirty-day suspension without pay, failing to require dismissal or lawful adjudication of the Charges and Specifications, and allowing unproven allegations to generate post-retirement consequences.

277. Defendant TAREK A. RAHMAN retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and ratified retaliation by failing to answer plaintiff's April 27, 2026 written response and demand for dismissal, failing to meaningfully address plaintiff's factual and legal objections, failing to dismiss the Charges and Specifications, failing to rescind the thirty-day suspension without pay, and failing to restore plaintiff's lost salary, overtime, benefits, accruals, seniority, assignments, and standing.

278. Defendant EDWARD A. THOMPSON retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and participated in retaliation by abusing the Internal Affairs authority entrusted to him by defendant TISCH, using the alleged leak investigation as a pretext, directing or influencing the investigation, and causing plaintiff to be targeted because of plaintiff's perceived association with Salvatore J. Greco and The Sal Greco Show.

279. Defendant JOSEPH A. DIBARTOLOMEO retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and participated in retaliation by using, directing, approving, maintaining, or failing to correct the alleged leak investigation and

disciplinary process used against plaintiff despite the absence of competent proof of dissemination and the failure to interview Mr. Greco.

280. Defendants KENNETH J. HARSCH, ANDREW T. JACKSON and JEFFREY K. ARCEO retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and participated in retaliation by allowing themselves to be used as investigative proxies for defendants THOMPSON and DIBARTOLOMEO, conducting a several-hour interview of plaintiff, repeatedly stopping the interview to consult with defendant THOMPSON, failing to conduct an independent and neutral investigation, and failing to identify competent proof that plaintiff disclosed confidential or non-public information.

281. Defendants HARSCH, JACKSON and ARCEO further retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and participated in retaliation by failing to interview Salvatore J. Greco, the alleged recipient and central witness to the Department's dissemination theory, while continuing to support a disciplinary theory based on timing, perceived association, and inference.

282. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and permitted or acquiesced in retaliation by failing to protect plaintiff after receiving actual notice that the disciplinary process was infected by retaliatory animus, irregularity, and lack of proof.

283. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. further retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and permitted or acquiesced in retaliation by failing to demand that defendants TISCH and RAHMAN answer plaintiff's written response,

failing to demand rescission of the thirty-day suspension without pay, failing to demand dismissal of the Charges and Specifications, failing to challenge defendant THOMPSON's role, and failing to protect plaintiff from the continued use of unresolved and unproven allegations.

284. Defendant SCOTT D. MUNRO retaliated against plaintiff, aided and abetted retaliation, interfered with plaintiff's rights, and permitted or acquiesced in retaliation in his dual capacity as an NYPD Detective First Grade and City employee and as an officer, representative, employee, agent, or decisionmaker of defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC.

285. Defendant MUNRO met with defendant TISCH concerning plaintiff and the challenged disciplinary action, learned that defendant TISCH admitted, in substance, that she did not know defendant THOMPSON was going to take the challenged action against plaintiff, and learned that defendant TISCH stated, in substance, that she "hated" plaintiff's attorney, Eric Sanders, Salvatore J. Greco, and The Sal Greco Show.

286. Defendant MUNRO therefore had actual notice that plaintiff's discipline was infected by retaliatory animus, perceived-association hostility, attorney-related hostility, and hostility toward public criticism of NYPD management.

287. Despite that actual notice, defendant MUNRO failed to take reasonable and available steps to protect plaintiff, failed to demand meaningful corrective action from defendant TISCH, failed to adequately challenge defendant THOMPSON's role, failed to adequately challenge the lack of proof, failed to secure an answer to plaintiff's written response, and failed to protect plaintiff from post-retirement punishment based on unresolved and unproven allegations.

288. After plaintiff engaged in protected activity and after defendants perceived plaintiff as associated with Salvatore J. Greco and The Sal Greco Show, defendants imposed, maintained, ratified, permitted, acquiesced in, or failed to correct the thirty-day suspension without pay, the Charges and Specifications, the failure to answer plaintiff's written response, the failure to conduct a department trial, and the continued use of unresolved and unproven allegations against plaintiff.

289. After plaintiff retired, defendants continued retaliating against him and interfering with his rights by treating unresolved allegations as proven misconduct, denying him a Good Guy Letter or its NYPD equivalent, failing to issue or provide an unrestricted retired identification card, seizing or withholding terminal leave and other earned benefits, impairing handgun-related authorization, and damaging his post-retirement employment opportunities.

290. Defendants' conduct was reasonably likely to deter a person from opposing discriminatory, retaliatory, arbitrary, or unlawful employment practices.

291. Defendants interfered with, restrained, coerced, intimidated, or threatened plaintiff in the exercise or enjoyment of rights protected by the New York City Human Rights Law.

292. Defendants' conduct was causally connected to plaintiff's protected activity, perceived protected activity, perceived association with Salvatore J. Greco and The Sal Greco Show, and opposition to defendants' discriminatory and retaliatory disciplinary practices.

293. Defendants TISCH, RAHMAN, THOMPSON, DIBARTOLOMEO, HARSCH, JACKSON, ARCEO, and MUNRO are individually liable under Administrative Code § 8-107(6) because they personally participated in, aided, abetted, incited, compelled, coerced, approved,

ratified, maintained, enforced, continued, permitted, acquiesced in, or failed to correct the retaliatory and interfering conduct alleged herein.

294. Defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. is liable as a labor organization, employer, joint employer, agent, and/or entity exercising authority, influence, or control over plaintiff's terms, conditions, privileges, and protections of employment because it participated in, aided, abetted, incited, compelled, coerced, permitted, acquiesced in, ratified, failed to prevent, or failed to correct retaliatory and interfering conduct affecting plaintiff's employment, discipline, representation, retirement-related interests, and post-retirement consequences.

295. Defendant MUNRO's retaliatory and interfering acts and omissions are attributable to defendant THE CITY OF NEW YORK because he remained an NYPD Detective First Grade and City employee while on union release time.

296. Defendant MUNRO's retaliatory and interfering acts and omissions are also attributable to defendant DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC. because he acted within the scope of his union authority, agency authority, release-time role, and representational duties.

297. Defendants' conduct violated the New York City Human Rights Law, Administrative Code §§ 8-107(7), 8-107(19), and 8-107(6).

298. As a direct and proximate result, plaintiff suffered economic loss, lost salary, lost overtime, lost terminal leave, lost benefits, lost accruals, loss of retirement-related compensation, reputational harm, disciplinary-record harm, retirement-related harm, post-retirement employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

JURY TRIAL

299. Plaintiff DAVID R. TERRELL hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff DAVID R. TERRELL respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO, jointly and severally where permitted by law, as follows:

- a. Declaring that defendants violated the New York State Human Rights Law, Executive Law § 290 et seq.;
- b. Declaring that defendants violated the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq.;
- c. Awarding plaintiff compensatory damages for lost salary, lost overtime, lost terminal leave, lost benefits, lost accruals, lost retirement-related compensation, lost post-retirement employment opportunities, reputational harm, emotional distress, disciplinary-record harm, retirement-related harm, and all other economic and non-economic injuries caused by defendants' unlawful conduct;
- d. Awarding plaintiff punitive damages against the individual defendants and any non-municipal defendant to the fullest extent permitted by law;
- e. Ordering defendants to rescind, remove, seal, expunge, or correct all references to the retaliatory and discriminatory investigation, thirty-day suspension without pay, Charges and Specifications under CHIA No. 2026-986 / IAB Log No. 2026-

11051, and related adverse material from plaintiff's personnel, disciplinary, employment, retirement-related, and other NYPD or union-maintained records;

- f. Ordering defendants to restore plaintiff's lost salary, overtime, terminal leave, benefits, accrued time, seniority, assignments, disciplinary standing, retirement-related compensation, and all other employment-related and retirement-related losses;
- g. Ordering defendants to issue, provide, restore, or lawfully reconsider plaintiff's Good Guy Letter or NYPD equivalent, unrestricted retired identification card, and all related post-retirement credentials and authorizations without reliance upon unresolved and unproven allegations;
- h. Ordering defendants to cease and desist from relying upon unresolved and unproven Charges and Specifications to impose, maintain, justify, or continue any adverse employment, disciplinary, retirement-related, credentialing, firearm-related, reputational, or post-retirement employment consequence against plaintiff;
- i. Ordering defendants to correct plaintiff's employment, disciplinary, retirement-related, credentialing, and post-retirement records to reflect that defendants never conducted a Department trial, never obtained a plea, never obtained a finding of guilt, and never obtained any final disciplinary or judicial finding establishing misconduct;
- j. Awarding plaintiff pre-judgment and post-judgment interest to the fullest extent permitted by law;

- k. Awarding plaintiff reasonable attorneys' fees, expert fees, costs, disbursements, and litigation expenses to the fullest extent permitted by the New York State Human Rights Law, the New York City Human Rights Law, and any other applicable law; and
- l. Awarding such other and further legal, equitable, declaratory, injunctive, monetary, and remedial relief as this Court deems just, proper, and necessary.

Dated: June 20, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DAVID R. TERRELL

THE SANDERS FIRM, P.C.

30 Wall Street, 8th Floor

New York, NY 10005

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Website: <http://www.thesandersfirmnpc.com>

ATTORNEY VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

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

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

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

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

Dated: June 20, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DAVID R. TERRELL

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

INDEX NO.:

DAVID R. TERRELL

Plaintiff,

-against-

THE CITY OF NEW YORK; JESSICA S. TISCH, TAREK A. RAHMAN, EDWARD
A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, ANDREW
T. JACKSON, JEFFREY K. ARCEO, DETECTIVES ENDOWMENT ASSOCIATION
POLICE DEPARTMENT, CITY OF NEW YORK INC., and SCOTT D. MUNRO

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff DAVID R. TERRELL

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