

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
ANGEL L. ESTRELLA

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK and JESSICA S. TISCH

Defendants
-----X

To the Defendant named above:

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

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

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

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

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

Venue is proper in Bronx County because a substantial part of the events and omissions giving rise to this action occurred in Bronx County, including plaintiff's former assignment to the 52nd Precinct, the underlying NYPD/CCRB incident involving plaintiff while assigned to the 52nd Precinct, and material employment-related facts connected to plaintiff's service in Bronx County.

Venue is also proper because the challenged post-retirement consequences alleged herein arise from, relate back to, and were caused by defendants' reliance upon unresolved disciplinary charges stemming from plaintiff's NYPD service and alleged conduct connected to Bronx County.

Plaintiff resides in New York County. Certain NYPD command, Police Commissioner, Personnel Bureau, Legal Bureau, Department Advocate, License Division, payroll, retirement, disciplinary, and administrative operations involving defendant JESSICA S. TISCH and other Department decisionmakers occurred in New York County or elsewhere within the City of New York.

Although certain administrative decisions, records, communications, or final determinations may have been made, maintained, reviewed, or transmitted from New York County or other City locations, venue remains properly designated in Bronx County pursuant to CPLR § 504(3), because defendant THE CITY OF NEW YORK is a party and the material events complained of occurred within the City of New York, including events materially connected to Bronx County.

Venue is further proper because the injuries, damages, and employment consequences alleged herein were caused by defendants' use of unresolved Bronx-connected disciplinary

allegations to deprive plaintiff of accrued computed time, a Good Guy Letter, unrestricted retired identification, firearm-related authorization, and post-retirement employment opportunities.

Dated: June 19, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff ANGEL L. ESTRELLA

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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
c/o New York City Police Department
Legal Bureau
One Police Plaza
New York, N.Y. 10038

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Plaintiff ANGEL L. ESTRELLA, by his attorney THE SANDERS FIRM, P.C.,
complaining of defendants THE CITY OF NEW YORK and JESSICA S. TISCH, alleges as
follows:

INTRODUCTION

This action challenges defendants' discriminatory and retaliatory use of unresolved and unproven disciplinary charges to punish plaintiff ANGEL L. ESTRELLA after he retired from the New York City Police Department.

Plaintiff is a Hispanic/Latino retired NYPD police officer who, self-identifies as Dominican. Plaintiff served approximately twelve years with the NYPD, including service while assigned to the 52nd Precinct in Bronx County. In addition to his NYPD service, plaintiff served approximately eight years in the United States Marine Corps and purchased or otherwise credited that military service time toward his retirement. As a result, plaintiff retired by service retirement, not disability retirement, and was entitled to the retirement benefits, accrued time, terminal leave, credentials, and related post-retirement benefits customarily afforded to eligible NYPD service retirees.

In or about April 2025, plaintiff received Department charges arising from a CCRB matter connected to an incident involving plaintiff while he was assigned to the 52nd Precinct. Those charges were allegations only. They were never tried. They were never proven. Plaintiff never pleaded guilty, and no disciplinary tribunal, judicial officer, or administrative decisionmaker ever found plaintiff guilty of the charged misconduct.

After receiving the charges, plaintiff filed for service retirement on or about June 9, 2025. His service retirement became effective on or about July 9, 2025. During that period, defendants had the opportunity to prosecute the charges before plaintiff's retirement became final. Defendants chose not to do so.

Before plaintiff retired, defendants did not change his duty status, did not remove him from full-duty status, and did not make any contemporaneous determination that plaintiff posed a safety, fitness, integrity, firearm-related, or employment-related risk.

After plaintiff retired, defendants nevertheless treated the unresolved charges as if they were adjudicated misconduct. Defendants seized or withheld plaintiff's accrued computed time, denied him a Good Guy Letter or its NYPD equivalent, issued him a restricted-use retired identification card, declined to support or process firearm-related authorization, and impaired his ability to obtain post-retirement employment.

Upon information and belief, similarly situated non-Hispanic, non-Latino, and non-Dominican officers who retired with unresolved disciplinary allegations, pending CCRB matters, substantiated CCRB allegations, open Department charges, or comparable alleged misconduct were not subjected to the same post-retirement economic, credentialing, firearm-related, and employment-disabling penalties.

Upon information and belief, defendants' treatment of plaintiff was not an isolated error. It reflected a longstanding NYPD policy, custom, practice, or tolerated pattern of using unresolved disciplinary allegations, untried charges, or non-adjudicated internal accusations to impair retiring and retired members' accrued compensation, Good Guy Letters, retired identification credentials, firearm-related authorization, and post-retirement employment opportunities. Upon information and belief, this practice has continued across successive NYPD administrations and was maintained, ratified, or continued under defendant JESSICA S. TISCH.

Defendants' conduct was not a lawful disciplinary determination because there was no disciplinary adjudication. It was not a neutral credentialing decision because defendants relied upon unproven allegations as a substitute for proven misconduct. It was not a legitimate public-safety determination because plaintiff's duty status was never changed before retirement.

Defendants' actions were discriminatory, retaliatory, arbitrary, and unlawful. Plaintiff brings this action to recover damages, restore his earned accrued computed time and related compensation, correct his retirement and personnel records, remedy defendants' discriminatory and retaliatory post-retirement restrictions, and obtain all other legal, equitable, declaratory, and monetary 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., 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 and JESSICA S. TISCH pursuant to CPLR §§ 301 and 302 because defendants reside in, are domiciled in, are employed in, conduct business in, exercise official authority in, maintain offices in, and/or committed acts or omissions complained of 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 and is subject to the jurisdiction of this Court.

4. Defendant JESSICA S. TISCH is the Police Commissioner of the City of New York and is sued in her official and individual capacities. At all relevant times, defendant TISCH exercised official authority within the State of New York, including authority over NYPD disciplinary administration, personnel practices, retirement-related credentialing, Good Guy Letter practices, firearm-related retirement determinations, and policies or customs governing the use of unresolved disciplinary charges against retiring and retired NYPD members.

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

6. Venue is proper in Bronx County because material events and omissions giving rise to this action occurred in or are substantially connected to Bronx County, including plaintiff's NYPD service while assigned to the 52nd Precinct, the Bronx-based CCRB/NYPD incident from which the unresolved Department charges arose, and defendants' later reliance upon those unresolved charges to impose post-retirement economic, credentialing, firearm-related, and employment-related consequences.

7. Venue is further proper because the unresolved Department charges used against plaintiff arose from allegations connected to plaintiff's NYPD service in Bronx County and from an incident involving plaintiff while assigned to the 52nd Precinct in Bronx County.

8. Plaintiff resides in New York County. Certain NYPD command, Police Commissioner, Personnel Bureau, Legal Bureau, Department Advocate, License Division, payroll, retirement, disciplinary, and administrative operations involving defendant TISCH and other NYPD decisionmakers occurred in New York County or elsewhere within the City of New York.

9. Although certain administrative decisions, records, communications, reviews, or final determinations may have been made, maintained, reviewed, approved, ratified, or transmitted from New York County or other City locations, venue remains properly designated in Bronx County pursuant to CPLR § 504(3), because defendant THE CITY OF NEW YORK is a party and the complained-of events occurred within the City of New York, including events materially connected to Bronx County.

10. Venue is also proper because the injuries, damages, and employment consequences alleged herein were caused by defendants' use of unresolved Bronx-connected disciplinary allegations to deprive plaintiff of accrued computed time, terminal leave, a Good Guy Letter or its NYPD equivalent, unrestricted retired identification, firearm-related authorization, and post-retirement employment opportunities.

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

PROCEDURAL REQUIREMENTS

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' discriminatory and retaliatory employment practices, post-retirement employment consequences, unlawful deprivation of earned compensation and retirement-related benefits, and related acts and omissions occurring within the City and State of New York.

14. Plaintiff alleges that defendants discriminated against him because of his race and national origin, retaliated against him for opposing unlawful and discriminatory treatment, and treated unresolved and unadjudicated disciplinary allegations as proven misconduct after defendants elected not to prosecute the Department charges before plaintiff's service retirement became effective.

15. Plaintiff seeks monetary, declaratory, equitable, and injunctive relief, including but not limited to damages, restoration or payment of accrued computed time and terminal leave, correction of retirement and personnel records, removal or correction of restricted retired-credential status, issuance or reconsideration of a Good Guy Letter or its NYPD equivalent under lawful and non-discriminatory criteria, restoration of firearm-related retirement processing or authorization to the extent permitted by law, attorneys' fees, costs, interest, and all other relief this Court deems just and proper.

PLAINTIFF

16. Plaintiff ANGEL L. ESTRELLA is a Hispanic/Latino retired NYPD police officer who, self-identifies as Dominican.

17. Plaintiff resides in New York County, State of New York.

18. Plaintiff entered the NYPD on or about July 9, 2013.
19. During his NYPD career, plaintiff served as a police officer, including service while assigned to the 52nd Precinct in Bronx County.
20. Plaintiff also served approximately eight years in the United States Marine Corps.
21. Plaintiff purchased, credited, or otherwise applied his qualifying United States Marine Corps service time toward his retirement eligibility.
22. By combining his NYPD service with his credited military service, plaintiff became eligible for service retirement.
23. Plaintiff filed for service retirement on or about June 9, 2025.
24. Plaintiff's service retirement became effective on or about July 9, 2025.
25. Plaintiff retired by service retirement, not disability retirement.
26. As a service retiree, plaintiff was entitled to the retirement benefits, accrued computed time, terminal leave, retirement processing, credentials, and related post-retirement benefits customarily afforded to eligible NYPD service retirees.
27. Before plaintiff's retirement became effective, defendants did not change plaintiff's duty status.
28. Before plaintiff's retirement became effective, defendants did not remove plaintiff from full-duty status.
29. Before plaintiff's retirement became effective, defendants did not make any contemporaneous determination that plaintiff posed a safety, fitness, integrity, firearm-related, or employment-related risk.
30. Plaintiff is an aggrieved person within the meaning of the New York State Human Rights Law and the New York City Human Rights Law.

31. Plaintiff has suffered economic loss, loss of earned accrued time, loss of terminal leave, reputational harm, retirement-credential harm, firearm-related employment harm, emotional distress, and other damages as a result of defendants' discriminatory, retaliatory, arbitrary, and unlawful conduct.

DEFENDANTS

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

33. 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, or permitted by NYPD officials, employees, agents, and decisionmakers acting within the scope of NYPD authority.

34. Defendant THE CITY OF NEW YORK is further sued because plaintiff's accrued computed time, terminal leave, Good Guy Letter or NYPD equivalent, retired identification card, firearm-related retirement processing, and post-retirement employment opportunities were affected by NYPD policies, customs, practices, decisions, and omissions attributable to the City.

35. Upon information and belief, defendant THE CITY OF NEW YORK treated plaintiff less favorably than similarly situated non-Hispanic, non-Latino, and non-Dominican officers who retired with unresolved disciplinary allegations, pending CCRB matters, open Department charges, or comparable alleged misconduct.

36. Upon information and belief, defendant THE CITY OF NEW YORK retaliated against plaintiff for opposing, challenging, objecting to, grieving, appealing, or refusing to accept the discriminatory and disproportionate use of unresolved and unproven disciplinary allegations

to deprive him of earned compensation, retirement credentials, firearm-related authorization, and post-retirement employment opportunities.

37. Defendant JESSICA S. TISCH is the Police Commissioner of the City of New York and the New York City Police Department.

38. Defendant TISCH is sued in her official and individual capacities.

39. At all relevant times, defendant TISCH possessed supervisory, administrative, disciplinary, policymaking, personnel, credentialing, and final decision-making authority over NYPD discipline, retirement processing, retired credentials, Good Guy Letter practices, firearm-related retirement determinations, and related post-retirement consequences.

40. Defendant TISCH is sued because, upon information and belief, she approved, authorized, ratified, maintained, enforced, or failed to correct the challenged post-retirement determinations, including the withholding of plaintiff's accrued computed time and terminal leave, denial of a Good Guy Letter or NYPD equivalent, issuance of a restricted-use retired identification card, refusal to support or process firearm-related retirement authorization, and continuation of employment-disabling consequences.

41. Defendant TISCH is further sued because plaintiff's post-retirement restrictions were imposed after defendants had the opportunity to prosecute the Department charges before plaintiff's retirement, chose not to do so, never obtained a guilty finding, never obtained a plea, never obtained a final disciplinary adjudication, and never changed plaintiff's duty status before retirement.

42. At all relevant times, defendant TISCH and other NYPD officials acted under color of law, 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 New York City Police Department.

BACKGROUND

A. Plaintiff ANGEL L. ESTRELLA's NYPD Service and Service-Retirement Eligibility

43. Plaintiff ANGEL L. ESTRELLA entered the NYPD on or about July 9, 2013.

44. Plaintiff ANGEL L. ESTRELLA served as an NYPD police officer for approximately twelve years.

45. During his NYPD career, plaintiff ANGEL L. ESTRELLA served in Bronx County, including while assigned to the 52nd Precinct.

46. Plaintiff ANGEL L. ESTRELLA also served approximately eight years in the United States Marine Corps.

47. Plaintiff ANGEL L. ESTRELLA purchased, credited, or otherwise applied his qualifying United States Marine Corps service toward his retirement eligibility.

48. By combining his NYPD service with his credited military service, plaintiff ANGEL L. ESTRELLA became eligible to retire by service retirement.

49. Plaintiff ANGEL L. ESTRELLA's service retirement entitled him to the retirement benefits, accrued computed time, terminal leave, retirement processing, credentials, and related post-retirement benefits customarily afforded to eligible NYPD service retirees.

B. The CCRB Matter and Department Charges

50. On or about November 15, 2023, plaintiff ANGEL L. ESTRELLA was involved in an NYPD/CCRB matter arising from an aided-person response connected to his service while assigned to the 52nd Precinct in Bronx County.

51. The matter involved allegations made by a civilian concerning plaintiff ANGEL L. ESTRELLA and other NYPD members.

52. The CCRB investigated the civilian's allegations.

53. The CCRB did not substantiate the broader allegations against plaintiff ANGEL L. ESTRELLA in the same manner.

54. Multiple allegations were found within NYPD guidelines.

55. One sexualized allegation was found unfounded.

56. Another alleged sexually suggestive gesture was unable to be determined.

57. The Department charges against plaintiff ANGEL L. ESTRELLA proceeded only on a narrow verbal allegation.

58. In or about April 2025, plaintiff ANGEL L. ESTRELLA received Department charges arising from the CCRB matter.

59. The Department charges alleged, in substance, that plaintiff ANGEL L. ESTRELLA made sexually suggestive remarks to the civilian at Jacobi Hospital.

60. The Department charges were accusations only.

61. The Department charges were never tried.

62. The Department charges were never proven.

63. Plaintiff ANGEL L. ESTRELLA never pleaded guilty to the Department charges.

64. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH never obtained a finding of guilt against plaintiff ANGEL L. ESTRELLA from any disciplinary tribunal, Deputy Commissioner of Trials, administrative decisionmaker, judicial officer, or other lawful adjudicator.

C. Plaintiff ANGEL L. ESTRELLA's Service Retirement and NYPD's Failure to Prosecute the Charges

65. After receiving the Department charges, plaintiff ANGEL L. ESTRELLA filed for service retirement on or about June 9, 2025.

66. Plaintiff ANGEL L. ESTRELLA's service retirement became effective on or about July 9, 2025.

67. During the approximately thirty-day period between plaintiff ANGEL L. ESTRELLA's filing for service retirement and the effective date of his retirement, defendants THE CITY OF NEW YORK and JESSICA S. TISCH had the opportunity to schedule and prosecute the Department charges.

68. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH chose not to do so.

69. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not conduct a disciplinary trial before plaintiff ANGEL L. ESTRELLA's retirement became effective.

70. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not obtain a guilty finding before plaintiff ANGEL L. ESTRELLA's retirement became effective.

71. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not obtain a plea before plaintiff ANGEL L. ESTRELLA's retirement became effective.

72. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not obtain any final disciplinary adjudication before plaintiff ANGEL L. ESTRELLA's retirement became effective.

73. Before plaintiff ANGEL L. ESTRELLA's retirement became effective, NYPD did not change his duty status.

74. Before plaintiff ANGEL L. ESTRELLA's retirement became effective, NYPD did not remove him from full-duty status.

75. Before plaintiff ANGEL L. ESTRELLA's retirement became effective, defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not make any contemporaneous determination that plaintiff ANGEL L. ESTRELLA posed a safety, fitness, integrity, firearm-related, or employment-related risk.

D. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH Treated Unproven Allegations as Proven Misconduct

76. After plaintiff ANGEL L. ESTRELLA's service retirement became effective, defendants THE CITY OF NEW YORK and JESSICA S. TISCH treated the unresolved Department charges as if they were proven misconduct.

77. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH used the unresolved Department charges as a basis to impose post-retirement economic, credentialing, firearm-related, and employment-disabling consequences against plaintiff ANGEL L. ESTRELLA.

78. Defendants THE CITY OF NEW YORK and defendant JESSICA S. TISCH seized, withheld, forfeited, or otherwise failed to pay plaintiff ANGEL L. ESTRELLA's accrued computed time.

79. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH seized, withheld, forfeited, or otherwise failed to pay plaintiff ANGEL L. ESTRELLA's terminal leave.

80. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH denied plaintiff ANGEL L. ESTRELLA a Good Guy Letter or its NYPD equivalent.

81. Defendant THE CITY OF NEW YORK and JESSICA S. TISCH issued plaintiff ANGEL L. ESTRELLA a restricted-use retired identification card.

82. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH declined to issue, support, endorse, or process firearm-related retirement authorization necessary for plaintiff ANGEL L. ESTRELLA to obtain or pursue post-retirement employment opportunities.

83. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH impaired plaintiff ANGEL L. ESTRELLA's ability to obtain gainful employment in security, investigative, law-enforcement-adjacent, and other positions for which retired NYPD credentials and firearm-related authorization are material qualifications.

84. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH damaged plaintiff ANGEL L. ESTRELLA financially, professionally, and reputationally.

85. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH imposed these post-retirement consequences without adjudicated misconduct.

86. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH imposed these post-retirement consequences without a guilty plea.

87. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH imposed these post-retirement consequences without a disciplinary trial finding.

88. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH imposed these post-retirement consequences without any pre-retirement duty-status change.

89. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH imposed these post-retirement consequences based upon unresolved and unproven allegations that they had the opportunity to try before plaintiff ANGEL L. ESTRELLA retired but elected not to prosecute.

E. Disparate Treatment and Retaliation

90. Upon information and belief, defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not impose comparable post-retirement economic, credentialing,

firearm-related, and employment-disabling penalties upon similarly situated non-Hispanic, non-Latino, and non-Dominican officers who retired with unresolved disciplinary allegations, pending CCRB matters, substantiated but unadjudicated CCRB allegations, open Department charges, or comparable alleged misconduct.

91. Upon information and belief, defendants THE CITY OF NEW YORK and JESSICA S. TISCH treated plaintiff ANGEL L. ESTRELLA less favorably because of his race and national origin.

92. Plaintiff ANGEL L. ESTRELLA opposed, challenged, objected to, appealed, grieved, complained about, or refused to accept defendants THE CITY OF NEW YORK's, and JESSICA S. TISCH's discriminatory and disproportionate use of unresolved and unproven disciplinary allegations to deprive him of earned compensation, retirement credentials, firearm-related authorization, and post-retirement employment opportunities.

93. Upon information and belief, defendants THE CITY OF NEW YORK and JESSICA S. TISCH retaliated against plaintiff ANGEL L. ESTRELLA because he opposed, challenged, objected to, appealed, grieved, complained about, or refused to accept discriminatory and unlawful treatment.

94. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH maintained, ratified, continued, or refused to correct the challenged post-retirement restrictions and economic deprivations after plaintiff ANGEL L. ESTRELLA opposed or challenged them.

95. Defendants THE CITY OF NEW YORK's, and JESSICA S. TISCH's conduct was discriminatory, retaliatory, arbitrary, capricious, and unlawful.

96. As a direct and proximate result of defendants THE CITY OF NEW YORK's, and JESSICA S. TISCH's conduct, plaintiff ANGEL L. ESTRELLA suffered economic loss,

loss of accrued computed time, loss of terminal leave, loss of employment opportunities, reputational harm, retirement-credential harm, firearm-related employment harm, emotional distress, attorneys' fees, costs, and other damages.

CONCLUSION

97. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH had the opportunity to prosecute the Department charges against plaintiff ANGEL L. ESTRELLA before his service retirement became effective. They chose not to do so. They did not obtain a guilty finding, did not obtain a plea, did not secure a final disciplinary adjudication, and did not change plaintiff ANGEL L. ESTRELLA's duty status before retirement.

98. After plaintiff ANGEL L. ESTRELLA retired, defendants THE CITY OF NEW YORK and JESSICA S. TISCH nevertheless treated unresolved and unproven allegations as if they were adjudicated misconduct. They withheld or seized his accrued computed time and terminal leave, denied him a Good Guy Letter or its NYPD equivalent, issued him a restricted-use retired identification card, refused to support or process firearm-related retirement authorization, and impaired his ability to obtain post-retirement employment.

99. Upon information and belief, defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not impose comparable post-retirement economic, credentialing, firearm-related, and employment-disabling penalties upon similarly situated non-Hispanic, non-Latino, and non-Dominican officers who retired with unresolved disciplinary allegations, pending CCRB matters, open Department charges, or comparable alleged misconduct.

100. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH's conduct was discriminatory, retaliatory, arbitrary, capricious, and unlawful. Plaintiff ANGEL L. ESTRELLA seeks damages, restoration or payment of all withheld accrued computed time and terminal

leave, correction of his retirement and personnel records, removal of the restricted-use retired identification designation, issuance or lawful reconsideration of a Good Guy Letter or NYPD equivalent, lawful processing of firearm-related retirement authorization, attorneys' fees, costs, interest, and such other and further relief as this Court deems just, proper, and equitable.

VIOLATIONS AND CLAIMS ALLEGED

COUNT I

**New York State Human Rights Law
Executive Law § 296**

**Race and National Origin, and/or Hispanic Ethnicity Discrimination
Against All Defendants**

101. Plaintiff ANGEL L. ESTRELLA repeats and realleges the preceding paragraphs as if fully set forth herein.

102. Plaintiff ANGEL L. ESTRELLA is Hispanic/Latino and, self-identifies as Dominican.

103. Defendant THE CITY OF NEW YORK, acting through NYPD, discriminated against plaintiff ANGEL L. ESTRELLA because of his race and national origin by treating unresolved and unproven Department charges as adjudicated misconduct after his service retirement became effective.

104. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH withheld or seized plaintiff ANGEL L. ESTRELLA's accrued computed time and terminal leave, denied him a Good Guy Letter or NYPD equivalent, issued him a restricted-use retired identification card, refused to support or process firearm-related retirement authorization, and impaired his post-retirement employment opportunities.

105. Defendants imposed these adverse actions even though plaintiff ANGEL L. ESTRELLA was never tried, never found guilty, never entered a plea, never received a final disciplinary adjudication, and never had his duty status changed before retirement.

106. Upon information and belief, similarly situated non-Hispanic, non-Latino, and non-Dominican officers were not subjected to comparable post-retirement economic, credentialing, firearm-related, and employment-disabling penalties under similar circumstances.

107. Defendant JESSICA S. TISCH is individually liable under Executive Law § 296(6) because, upon information and belief, she aided, abetted, approved, ratified, maintained, enforced, or failed to correct the discriminatory conduct alleged herein.

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

109. As a direct and proximate result, plaintiff ANGEL L. ESTRELLA suffered economic loss, loss of accrued computed time, loss of terminal leave, loss of employment opportunities, reputational harm, retirement-credential harm, firearm-related employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

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

110. Plaintiff ANGEL L. ESTRELLA repeats and realleges the preceding paragraphs as if fully set forth herein.

111. Plaintiff ANGEL L. ESTRELLA engaged in protected activity when he opposed, challenged, objected to, grieved, appealed, complained about, or refused to accept defendants' discriminatory and disproportionate use of unresolved and unproven Department charges to

deprive him of earned compensation, retirement credentials, firearm-related authorization, and post-retirement employment opportunities.

112. Defendants knew or should have known that plaintiff ANGEL L. ESTRELLA opposed and challenged discriminatory and unlawful treatment.

113. After plaintiff ANGEL L. ESTRELLA engaged in protected activity, defendants maintained, continued, ratified, or refused to correct the withholding of his accrued computed time and terminal leave, denial of a Good Guy Letter or NYPD equivalent, restricted-use retired identification card, refusal to process firearm-related retirement authorization, and related employment-disabling consequences.

114. Defendants' actions would reasonably deter a person from opposing discriminatory or unlawful employment practices.

115. Defendant JESSICA S. TISCH is individually liable under Executive Law § 296(6) because, upon information and belief, she aided, abetted, approved, ratified, maintained, enforced, or failed to correct the retaliatory conduct alleged herein.

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

117. As a direct and proximate result, plaintiff ANGEL L. ESTRELLA suffered economic loss, loss of accrued computed time, loss of terminal leave, loss of employment opportunities, reputational harm, retirement-credential harm, firearm-related employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

COUNT III
New York City Human Rights Law
Administrative Code § 8-107
Race and National Origin, and/or Hispanic Ethnicity Discrimination
Against All Defendants

118. Plaintiff ANGEL L. ESTRELLA repeats and realleges the preceding paragraphs as if fully set forth herein.

119. Plaintiff ANGEL L. ESTRELLA is Hispanic/Latino and, self-identifies as Dominican.

120. Defendant THE CITY OF NEW YORK, acting through NYPD, treated plaintiff ANGEL L. ESTRELLA less well because of his race and national origin by treating unresolved and unproven Department charges as adjudicated misconduct after his service retirement became effective.

121. Defendants withheld or seized plaintiff ANGEL L. ESTRELLA's accrued computed time and terminal leave, denied him a Good Guy Letter or NYPD equivalent, issued him a restricted-use retired identification card, refused to support or process firearm-related retirement authorization, and impaired his post-retirement employment opportunities.

122. Defendants imposed these adverse actions even though plaintiff ANGEL L. ESTRELLA was never tried, never found guilty, never entered a plea, never received a final disciplinary adjudication, and never had his duty status changed before retirement.

123. Upon information and belief, similarly situated non-Hispanic, non-Latino, and non-Dominican officers were not subjected to comparable post-retirement economic, credentialing, firearm-related, and employment-disabling penalties under similar circumstances.

124. Defendant JESSICA S. TISCH is individually liable under Administrative Code § 8-107(6) because, upon information and belief, she aided, abetted, incited, compelled, coerced, approved, ratified, maintained, enforced, or failed to correct the discriminatory conduct alleged herein.

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

126. As a direct and proximate result, plaintiff ANGEL L. ESTRELLA suffered economic loss, loss of accrued computed time, loss of terminal leave, loss of employment opportunities, reputational harm, retirement-credential harm, firearm-related employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

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

127. Plaintiff ANGEL L. ESTRELLA repeats and realleges the preceding paragraphs as if fully set forth herein.

128. Plaintiff ANGEL L. ESTRELLA engaged in protected activity when he opposed, challenged, objected to, grieved, appealed, complained about, or refused to accept defendants' discriminatory and disproportionate use of unresolved and unproven Department charges to deprive him of earned compensation, retirement credentials, firearm-related authorization, and post-retirement employment opportunities.

129. Defendants knew or should have known that plaintiff ANGEL L. ESTRELLA opposed and challenged discriminatory and unlawful treatment.

130. After plaintiff ANGEL L. ESTRELLA engaged in protected activity, defendants maintained, continued, ratified, or refused to correct the withholding of his accrued computed time and terminal leave, denial of a Good Guy Letter or NYPD equivalent, restricted-use retired identification card, refusal to process firearm-related retirement authorization, and related employment-disabling consequences.

131. Defendants' actions were reasonably likely to deter a person from opposing discriminatory or unlawful employment practices.

132. defendant JESSICA S. TISCH is individually liable under Administrative Code § 8-107(6) because, upon information and belief, she aided, abetted, incited, compelled, coerced, approved, ratified, maintained, enforced, or failed to correct the retaliatory conduct alleged herein.

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

134. As a direct and proximate result, plaintiff ANGEL L. ESTRELLA suffered economic loss, loss of accrued computed time, loss of terminal leave, loss of employment opportunities, reputational harm, retirement-credential harm, firearm-related employment harm, emotional distress, attorneys' fees, costs, interest, and other damages.

JURY TRIAL

135. Plaintiff ANGEL L. ESTRELLA hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff ANGEL L. ESTRELLA respectfully demands judgment against defendants THE CITY OF NEW YORK and JESSICA S. TISCH, jointly and severally where permitted by law, as follows:

- a. Declaring that defendants' conduct violated the New York State Human Rights Law and the New York City Human Rights Law;

- b. Awarding compensatory damages for economic loss, lost accrued computed time, lost terminal leave, lost employment opportunities, reputational harm, retirement-credential harm, firearm-related employment harm, emotional distress, humiliation, and other injuries in an amount to be determined at trial;
- c. Directing defendants to restore, pay, or otherwise compensate plaintiff ANGEL L. ESTRELLA for all accrued computed time, terminal leave, and related retirement compensation unlawfully withheld, seized, forfeited, or denied;
- d. Directing defendants to correct plaintiff ANGEL L. ESTRELLA's personnel, retirement, payroll, disciplinary, and credentialing records to remove or correct any designation, notation, restriction, or consequence based upon unresolved and unadjudicated Department charges;
- e. Directing defendants to remove plaintiff ANGEL L. ESTRELLA's restricted-use retired identification designation and issue corrected retired identification consistent with lawful, non-discriminatory, and non-retaliatory criteria;
- f. Directing defendants to issue, or lawfully reconsider under non-discriminatory and non-retaliatory criteria, plaintiff ANGEL L. ESTRELLA's Good Guy Letter or NYPD equivalent;
- g. Directing defendants to process, support, endorse, or lawfully reconsider plaintiff ANGEL L. ESTRELLA's firearm-related retirement authorization under lawful, non-discriminatory, and non-retaliatory criteria;
- h. Awarding punitive damages against defendant JESSICA S. TISCH in her individual capacity to the fullest extent permitted by law;
- i. Awarding pre-judgment and post-judgment interest;

- j. Awarding attorneys' fees, costs, disbursements, and expenses pursuant to the New York State Human Rights Law, the New York City Human Rights Law, and all other applicable law; and
- k. Granting such other and further relief as this Court deems just, proper, and equitable.

Dated: June 19, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff ANGEL L. ESTRELLA

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ATTORNEY VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

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

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

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

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

Dated: June 19, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff ANGEL L. ESTRELLA

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

INDEX NO.:

ANGEL L. ESTRELLA

Plaintiff,

-against-

THE CITY OF NEW YORK and JESSICA S. TISCH

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders

Attorney for Plaintiff ANGEL L. ESTRELLA

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