

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

-----X  
AMRIT P. SINGH

Plaintiffs,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S.  
ADLER, AND CHRISTINE M. MALONEY

Defendants  
-----X

Summons

Index No.

Jury Demand

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.

The action will be heard in the Supreme Court of the State of New York, County of New York, 60 Centre Street, New York, N.Y. 10007.

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 and material events giving rise to plaintiff’s

claims occurred in New York County, including NYPD disciplinary prosecution, proceedings before the Deputy Commissioner of Trials, penalty recommendation, final disciplinary review, policymaking, ratification, and final employment decision.

Venue is not designated based upon plaintiff's residence. Plaintiff AMRIT P. SINGH resides in Queens County, New York.

Dated: May 23, 2026  
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders  
Attorney for Plaintiff AMRIT P. SINGH

**THE SANDERS FIRM, P.C.**  
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DEFENDANT ADDRESSES

Defendant THE CITY OF NEW YORK  
c/o New York City Law Department  
100 Church Street  
New York, N.Y. 10007

Defendants' JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY  
c/o Police Department City of New York  
One Police Plaza  
New York, N.Y. 10038

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

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Plaintiffs,

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THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S.  
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Defendants  
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Verified Complaint

Index No.

Jury Demand

The Plaintiff AMRIT P. SINGH through his attorney The Sanders Firm, P.C., files this Verified Complaint against Defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY respectfully set forth and allege that:

**INTRODUCTION**

Plaintiff AMRIT P. SINGH brings this plenary statutory discrimination and retaliation action against defendants THE CITY OF NEW YORK; JESSICA S. TISCH, individually and in her official capacity as Police Commissioner of the City of New York; JEFF S. ADLER, individually and in his official capacity as Assistant Deputy Commissioner–Trials; and CHRISTINE M. MALONEY, individually and in her official capacity as Executive Agency Counsel and Department Advocate. This action arises from defendants’ alleged use of plaintiff AMRIT P. SINGH’S dismissed and sealed criminal case, related domestic-incident accusation materials, recanted witness statements, and disciplinary accusation record as the continuing basis for his termination from the New York City Police Department.

Plaintiff AMRIT P. SINGH is a former NYPD police officer. The underlying disciplinary matter arose from domestic-incident allegations involving plaintiff and his wife, Satvinder Kaur, including allegations relating to September 11, 2023 and earlier alleged incidents. The related criminal matter was dismissed and sealed by the Queens Criminal Court pursuant to CPL § 160.50. Plaintiff alleges that once the criminal case was dismissed and sealed, defendants had no lawful authority to continue treating the dismissed criminal accusation-set as an operative employment fact, disciplinary shortcut, or basis for termination.

Notwithstanding the dismissal and sealing of the criminal case, defendants allegedly continued to rely upon the same domestic-incident accusation materials as the foundation for plaintiff's employment destruction. Defendant CHRISTINE M. MALONEY prosecuted the disciplinary case as Department Advocate. Defendant JEFF S. ADLER presided over the disciplinary trial as Assistant Deputy Commissioner–Trials, credited prior accusation materials over recanting witnesses, and recommended termination. Defendant JESSICA S. TISCH, as Police Commissioner and final disciplinary authority, adopted the recommendation of termination and dismissed plaintiff from the Police Department City of New York.

Recantation presents a serious legal and evidentiary hurdle in domestic-violence-related proceedings. Plaintiff does not allege that a recantation must automatically control, or that a disciplinary tribunal may never consider whether an initial allegation is more reliable than later testimony. Plaintiff alleges something narrower and materially different. Defendants treated recantation not as a warning requiring caution, corroboration, and lawful proof, but as an obstacle to be overcome by institutional preference for the original accusation narrative. In doing so, defendants elevated accusation materials, out-of-court statements, domestic-incident reports,

interview recordings, and sealed or seal-derived criminal-case allegations over sworn trial testimony, recanting witnesses, and the legal consequences of dismissal and sealing.

Plaintiff alleges that defendants' conduct was not merely an ordinary exercise of disciplinary discretion. Defendants allegedly used the Department's disciplinary process as an *ultra vires* administrative continuation of a dismissed and sealed criminal case. The Department did not simply evaluate competent independent proof of misconduct. It revived the dismissed criminal accusation-set, treated recanted allegations as established misconduct, and imposed the harshest employment penalty available through an evidentiary pathway New York law does not permit.

The sealing statutes are not discretionary administrative preferences. *Matter of Joseph M. v. New York State Police*, 82 N.Y.2d 128 (1993), makes clear that CPL § 160.50 imposes a general proscription against the release and use of sealed records, subject only to narrowly drawn statutory exceptions, and that courts do not possess inherent discretionary authority to unseal records for employment discipline absent statutory authorization. Plaintiff alleges that defendants disregarded those limits by using plaintiffs dismissed and sealed accusation materials as the functional basis for termination.

Defendants also acted against a backdrop of direct judicial notice to the NYPD. In *R.C. v. City of New York*, 64 Misc. 3d 368 (Sup. Ct., N.Y. County 2019), the court rejected the NYPD's position that sealed arrest information could be accessed or used internally for investigatory, disciplinary, or other Department purposes merely because the information remained within the NYPD. In *R.C. v. City of New York*, Index No. 153739/2018, NYSCEF Doc. No. 200 (Sup. Ct., N.Y. County Sept. 27, 2021), the court granted preliminary injunctive relief, found that the NYPD admitted its prior sealed-record training was contrary to law, and directed corrective

action. In *R.C. v. City of New York*, 2024 N.Y. Slip Op. 03017 (1st Dep't June 4, 2024), the Appellate Division vacated a later permanent implementing order as premature and overbroad, but expressly left the preliminary injunction in full force and effect. Plaintiff alleges that defendants nevertheless revived and relied upon plaintiff AMRIT P. SINGH'S dismissed and sealed criminal accusation materials as the functional basis for termination.

Plaintiff further alleges that defendants' actions were infected by gender-based domestic-violence stereotypes. Defendants allegedly treated plaintiff, a male police officer involved in a domestic incident, as the presumptive aggressor and discounted his defensive account, his actual or perceived status as a victim of domestic violence, the witnesses' recantations, the absence of a criminal conviction, and the sealing of the criminal matter. Plaintiff alleges that defendants' reliance on gendered assumptions and domestic-violence accusation status resulted in arrest-history discrimination, gender discrimination, discrimination based upon actual or perceived status as a victim of domestic violence, and retaliation in violation of the New York State Human Rights Law and, where applicable, the New York City Human Rights Law.

The disparity in penalty treatment is central to this action. Plaintiff alleges that the NYPD has retained members of service who engaged in serious misconduct, including criminal or potentially criminal conduct, violent misconduct, firearm-related misconduct, dishonesty, abuse of authority, domestic incidents, and other conduct prejudicial to the good order, efficiency, or discipline of the Department. Plaintiff, by contrast, was terminated after dismissal, sealing, recantation, and an evidentiary record dependent on prior accusation materials. Plaintiff alleges that this disparate penalty treatment reflects unlawful discrimination, retaliation, arbitrary penalty escalation, and unlawful use of sealed records.

Plaintiff does not bring this action as an Article 78 proceeding and does not seek ordinary administrative review of the disciplinary determination in isolation. Plaintiff brings this action to recover for defendants alleged discriminatory and retaliatory use of a dismissed and sealed criminal case, gender-based domestic-violence stereotypes, actual or perceived domestic-violence-victim status, and protected opposition to unlawful practices. Plaintiff also seeks relief for defendants alleged *ultra vires* use of sealed criminal accusation materials in a manner that New York law expressly forbids.

As a result of defendants' conduct, plaintiff alleges that he suffered loss of NYPD employment, loss of salary and benefits, loss of seniority and pension-related benefits, impairment of future law-enforcement and security-related employment opportunities, reputational harm, emotional distress, economic loss, and continuing damage to his professional standing. Plaintiff seeks compensatory damages, declaratory relief, injunctive relief, reinstatement or front pay where appropriate, restoration of lost wages and benefits, expungement or correction of unlawful records, attorneys' fees, costs, and all other relief permitted by law.

### **JURISDICTION AND VENUE**

1. This Court has subject-matter jurisdiction over this action because plaintiff AMRIT P. SINGH asserts claims arising under the New York State Human Rights Law, N.Y. Exec. Law § 296, including claims for arrest-history discrimination, gender discrimination, discrimination based upon actual or perceived status as a victim of domestic violence, retaliation, and related legal and equitable relief.

2. Plaintiff further asserts claims, where applicable, under the New York City Human Rights Law, N.Y.C. Admin. Code § 8-107, including claims for arrest-history

discrimination, gender discrimination, domestic-violence-victim-status discrimination, retaliation, and related relief arising from defendants' alleged conduct within, and having a sufficient nexus to, New York City.

3. Plaintiff also seeks declaratory and injunctive relief arising from defendants' alleged use, reliance upon, maintenance, transmission, adoption, ratification, or adverse employment treatment of plaintiff based upon a criminal matter terminated in his favor and sealed under New York law, including protections codified in CPL §§ 160.50 and 160.60.

4. This Court has jurisdiction over defendant THE CITY OF NEW YORK because it is a municipal corporation organized and existing under the laws of the State of New York, is plaintiff's former employer, and acted through the New York City Police Department and its agents, employees, officials, policymakers, and final disciplinary authorities.

5. This Court has jurisdiction over defendant JESSICA S. TISCH because, at all relevant times, she acted under color of state and municipal authority as Police Commissioner of the City of New York, final disciplinary authority for the NYPD, and final policymaker with respect to plaintiff's dismissal from the Police Department City of New York. Defendant TISCH is sued individually and in her official capacity.

6. This Court has jurisdiction over defendant JEFF S. ADLER because, at all relevant times, he acted under color of state and municipal authority as Assistant Deputy Commissioner–Trials, presided over plaintiff's NYPD disciplinary trial, made findings and credibility determinations, and recommended termination. Defendant ADLER is sued individually and in his official capacity.

7. This Court has jurisdiction over defendant CHRISTINE M. MALONEY because, at all relevant times, she acted under color of state and municipal authority as Executive Agency

Counsel and Department Advocate, prosecuted the disciplinary charges against plaintiff, and allegedly relied upon dismissed, sealed, recanted, or seal-derived accusation materials as the evidentiary basis for plaintiff's termination. Defendant MALONEY is sued individually and in her official capacity.

8. Venue is proper in New York County pursuant to CPLR 504(3) because defendant THE CITY OF NEW YORK is sued herein and a substantial part of the alleged unlawful acts, omissions, discriminatory employment practices, disciplinary prosecution, adjudicatory conduct, policymaking, ratification, final disciplinary decision-making, and retaliatory conduct occurred in New York County.

9. Venue is further proper in New York County because the challenged conduct includes actions and omissions by defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY arising from NYPD disciplinary prosecution, Department Advocate's Office activity, proceedings before the Deputy Commissioner of Trials, penalty recommendation, final disciplinary review, policymaking, ratification, and plaintiff's dismissal from the Police Department City of New York, all centered in New York County.

10. Material portions of the challenged conduct also occurred within New York City, including plaintiff's NYPD employment, NYPD disciplinary proceedings, NYPD decision-making, and the employment consequences flowing from defendants alleged discriminatory, retaliatory, and *ultra vires* use of dismissed and sealed criminal accusation materials.

11. Plaintiff does not bring this action as an Article 78 proceeding seeking ordinary administrative review of the NYPD disciplinary determination in isolation. Plaintiff brings this plenary statutory discrimination and retaliation action seeking legal, equitable, declaratory,

injunctive, and statutory relief arising from defendants' alleged use of dismissed and sealed criminal accusation materials, gender-based domestic-violence stereotypes, actual or perceived domestic-violence-victim status, and protected opposition to unlawful practices.

12. Plaintiff alleges that defendants' challenged conduct caused continuing harm to his employment, professional standing, law-enforcement career, reputation, earnings, benefits, seniority, and future employment opportunities. Venue in New York County is proper because the core NYPD disciplinary, prosecutorial, adjudicatory, policymaking, and final termination conduct giving rise to those harms occurred in New York County.

### **PROCEDURAL HISTORY AND CONDITIONS PRECEDENT**

13. Plaintiff AMRIT P. SINGH brings this plenary state-court action to pursue statutory discrimination, retaliation, declaratory, injunctive, equitable, and related claims under New York law and, where applicable, New York City law.

14. This action is not brought as a CPLR Article 78 proceeding seeking ordinary administrative review of the NYPD disciplinary determination in isolation. Plaintiff brings this action to recover for defendants alleged discriminatory and retaliatory use of dismissed and sealed criminal accusation materials, gender-based domestic-violence stereotypes, actual or perceived domestic-violence-victim status, and protected opposition to unlawful practices.

15. This action also seeks relief arising from defendants alleged *ultra vires* use, reliance upon, presentation, adoption, ratification, maintenance, or adverse employment use of sealed criminal accusation materials in violation of New York sealing law, including CPL §§ 160.50 and 160.60.

16. Plaintiff has complied with all condition's precedent required to commence this action, or such conditions have been waived, excused, satisfied, tolled, preserved, or are otherwise inapplicable.

17. To the extent defendants contend that any administrative, statutory, or procedural condition precedent applies, plaintiff alleges that such condition has been satisfied, excused, waived, or rendered futile by defendants' own conduct, including defendants' final termination decision, continued reliance upon the challenged disciplinary record, and alleged ongoing adverse consequences arising from the dismissed and sealed criminal accusation materials.

### **PLAINTIFF**

18. Plaintiff AMRIT P. SINGH is a male citizen of the United States of America, over twenty-one (21) years of age, and a resident and citizen of Queens County, New York.

19. Plaintiff AMRIT P. SINGH is a former police officer employed by defendant THE CITY OF NEW YORK through the New York City Police Department.

20. Plaintiff AMRIT P. SINGH was appointed to the NYPD in or about January 2019 and, at relevant times, was assigned to Housing Police Service Area 5 and later to the Bronx Court Section.

21. Before the challenged disciplinary actions alleged herein, plaintiff AMRIT P. SINGH maintained a record of public service, lawful firearm possession, law-enforcement employment, and continued eligibility to serve as a New York City police officer.

22. Plaintiff AMRIT P. SINGH alleges that he was subjected to arrest-history discrimination, gender discrimination, discrimination based upon actual or perceived status as a victim of domestic violence, and retaliation arising from defendants' use of dismissed and sealed

criminal accusation materials, domestic-incident allegations, recanted witness statements, and the NYPD disciplinary process that resulted in his termination.

23. Plaintiff AMRIT P. SINGH further alleges that defendants treated him as the presumptive aggressor because he is male, discounted his defensive account and actual or perceived status as a victim of domestic violence, and converted a dismissed, sealed, and recanted domestic-incident accusation record into career-ending employment action.

24. Plaintiff AMRIT P. SINGH alleges that defendants' conduct caused him to suffer loss of NYPD employment, salary, benefits, seniority, pension-related benefits, professional standing, reputation, future law-enforcement and security-related opportunities, emotional distress, economic loss, and other damages recoverable by law.

#### **DEFENDANTS**

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

26. At all relevant times, defendant THE CITY OF NEW YORK employed plaintiff AMRIT P. SINGH through the New York City Police Department.

27. At all relevant times, defendant THE CITY OF NEW YORK acted through the New York City Police Department, including its Police Commissioner, Deputy Commissioner of Trials, Department Advocate's Office, Executive Agency Counsel, supervisors, agents, employees, policymakers, and final disciplinary decision-makers.

28. Defendant JESSICA S. TISCH is the Police Commissioner of the City of New York and the final disciplinary authority for the New York City Police Department. Defendant TISCH is sued individually and in her official capacity.

29. At all relevant times, defendant JESSICA S. TISCH acted under color of law and within the scope of her authority as Police Commissioner, final policymaker, and final disciplinary decision-maker for the NYPD.

30. Plaintiff alleges that defendant JESSICA S. TISCH personally adopted, ratified, approved, and executed the final disciplinary action dismissing plaintiff AMRIT P. SINGH from the Police Department City of New York, based upon the disciplinary record, findings, recommendation, and accusation materials challenged herein.

31. Defendant JEFF S. ADLER was, at all relevant times, an Assistant Deputy Commissioner–Trials assigned to the NYPD Deputy Commissioner of Trials. Defendant ADLER is sued individually and in his official capacity.

32. At all relevant times, defendant JEFF S. ADLER acted under color of law and within the scope of his authority as the adjudicatory officer who presided over plaintiff AMRIT P. SINGH’S disciplinary trial, made findings, evaluated the evidence, credited prior accusation materials over recanting witnesses, and recommended termination.

33. Plaintiff alleges that defendant JEFF S. ADLER personally participated in the challenged conduct by adopting, relying upon, and giving operative disciplinary effect to dismissed, sealed, recanted, or seal-derived criminal accusation materials as the evidentiary foundation for plaintiff’s termination.

34. Defendant CHRISTINE M. MALONEY was, at all relevant times, Executive Agency Counsel and/or Department Advocate assigned to prosecute disciplinary charges against plaintiff AMRIT P. SINGH before the NYPD Deputy Commissioner of Trials. Defendant MALONEY is sued individually and in her official capacity.

35. At all relevant times, defendant CHRISTINE M. MALONEY acted under color of law and within the scope of her authority as a Department Advocate and NYPD attorney participating in the investigation, preparation, presentation, and prosecution of disciplinary charges against plaintiff.

36. Plaintiff alleges that defendant CHRISTINE M. MALONEY personally participated in the challenged conduct by prosecuting the disciplinary matter through reliance upon dismissed, sealed, recanted, or seal-derived criminal accusation materials, prior out-of-court statements, domestic-incident materials, recorded interviews, and related accusation evidence.

37. At all relevant times, each individual defendant acted under color of law and/or as an agent, employee, supervisor, policymaker, final decision-maker, advocate, adjudicatory officer, or participant acting on behalf of defendant THE CITY OF NEW YORK and the New York City Police Department.

38. At all relevant times, defendants acted individually, jointly, severally, and/or in concert as alleged herein.

39. At all relevant times, defendants' acts, omissions, decisions, policies, customs, practices, ratifications, and adverse employment actions were undertaken under color of state and municipal authority and within the course and scope of defendants' respective positions, except to the extent defendants acted outside lawful authority by using, relying upon, presenting, adopting, ratifying, maintaining, or giving adverse employment effect to dismissed and sealed criminal accusation materials in violation of New York law.

### **BACKGROUND**

#### **ARREST HISTORY and ALLEGED DOMESTIC RELATED INCIDENTS**

40. Plaintiff AMRIT P. SINGH has no criminal conviction arising from the domestic-related allegations described herein.

41. The pre-trial domestic-related allegations involved plaintiff AMRIT P. SINGH, his wife, Satvinder Kaur, and certain family members.

42. The alleged incidents included events alleged to have occurred on or about August 31, 2021, May 20, 2023, August 13, 2023, and September 11, 2023.

43. Before September 11, 2023, plaintiff AMRIT P. SINGH and Satvinder Kaur experienced marital and family conflict.

44. Plaintiff AMRIT P. SINGH alleges that the underlying family conflict was later framed against him through a domestic-violence accusation narrative that treated him as the presumptive aggressor because he is male.

45. Plaintiff AMRIT P. SINGH further alleges that the pre-trial accusation narrative failed to meaningfully account for his defensive account, his actual or perceived status as a victim of domestic violence or defensive actor, and the possibility that the original allegations were incomplete, exaggerated, unreliable, or false.

46. On or about September 11, 2023, Satvinder Kaur contacted law enforcement during a domestic-related family dispute involving plaintiff AMRIT P. SINGH.

47. During and after the September 11, 2023 law-enforcement response, domestic-incident materials, witness statements, recorded interviews, 911-related materials, and other accusation materials were generated concerning plaintiff AMRIT P. SINGH.

48. Those materials included allegations concerning a firearm, family conflict, prior alleged domestic-related events, and plaintiff AMRIT P. SINGH'S conduct during the September 11, 2023 incident.

49. Plaintiff AMRIT P. SINGH denies that the pre-trial accusation materials accurately, fairly, or completely described the underlying family dispute.

50. Plaintiff AMRIT P. SINGH alleges that the pre-trial accusation materials reflected a one-sided domestic-violence narrative that treated accusation as proof and treated plaintiff's status as a male police officer as evidence of aggression rather than as a factor requiring neutral investigation.

51. Plaintiff AMRIT P. SINGH further alleges that the pre-trial accusation materials were created before the principal witnesses testified under oath, before later recantations or material retreats from prior allegations, and before the criminal matter was dismissed and sealed.

52. Plaintiff AMRIT P. SINGH was arrested on September 12, 2023, and arraigned on September 12, 2023, in Queens Criminal Court.

53. The Certificate of Disposition identifies the charged offenses as: Penal Law § 260.10(1), Acting in a Manner Injurious to a Child Less Than Seventeen; Penal Law § 120.14(1), Menacing in the Second Degree with a Weapon; Penal Law § 120.00(1), Assault in the Third Degree with Intent to Cause Physical Injury; and Penal Law § 240.26(1), Harassment in the Second Degree by Physical Contact.

54. The Queens Criminal Court dismissed all listed charges on January 30, 2024, on speedy-trial grounds pursuant to CPL § 170.30(1)(e), and the matter was sealed pursuant to CPL § 160.50.

55. Upon dismissal and sealing, plaintiff AMRIT P. SINGH was restored, in contemplation of law, to the status he occupied before the arrest and prosecution.

56. Plaintiff AMRIT P. SINGH alleges that the dismissal and sealing of the criminal matter legally changed how defendants could treat the arrest, prosecution, and related official accusation materials.

57. Plaintiff AMRIT P. SINGH alleges that, after dismissal and sealing, defendants were prohibited from using the dismissed and sealed criminal accusation materials as an employment disqualification, disciplinary shortcut, or continuing adverse employment basis absent statutory authorization or a court order.

58. Plaintiff AMRIT P. SINGH alleges that defendants nevertheless continued to treat the pre-trial domestic-related accusation materials as operative employment evidence and as the foundation for later adverse employment action.

59. Plaintiff AMRIT P. SINGH alleges that defendants' pre-trial and post-sealing treatment of the domestic-related allegations formed part of a continuing chain of arrest-history discrimination, gender discrimination, domestic-violence-status discrimination, retaliation, and unlawful use of sealed criminal accusation materials.

#### **THE NYPD DISCIPLINARY AND REVIEW PROCESS**

60. Plaintiff AMRIT P. SINGH alleges that defendant THE CITY OF NEW YORK is a municipal corporation and public employer duly organized under the laws of the State of New York.

61. Plaintiff AMRIT P. SINGH alleges that defendant THE CITY OF NEW YORK operates the New York City Police Department as a mayoral agency charged with law-enforcement responsibilities and with the management, supervision, discipline, and termination of NYPD members of service.

62. Plaintiff AMRIT P. SINGH alleges that, at all relevant times, defendant THE CITY OF NEW YORK acted through the NYPD, including the Police Commissioner, the

Department Advocate's Office, the Office of the Deputy Commissioner of Trials, and other NYPD agents, employees, officials, policymakers, and final decision-makers.

63. Plaintiff AMRIT P. SINGH alleges that Administrative Code of the City of New York § 14-115(a) gives the Police Commissioner authority, in his or her discretion, upon conviction by the commissioner, or by any court or officer of competent jurisdiction, of a member of the force for specified misconduct, to impose discipline including reprimand, forfeiture of pay, suspension without pay, or dismissal from the force.

64. Plaintiff AMRIT P. SINGH alleges that, although the Police Commissioner delegates investigative, prosecutorial, adjudicatory, and recommendation functions to NYPD components and officials, the Police Commissioner retains final disciplinary authority and the power to adopt, modify, reject, or impose discipline upon members of service.

65. Plaintiff AMRIT P. SINGH alleges that defendant JESSICA S. TISCH, as Police Commissioner of the City of New York, was the final disciplinary authority who adopted, ratified, approved, and executed the final dismissal of plaintiff AMRIT P. SINGH from the Police Department City of New York.

66. Plaintiff AMRIT P. SINGH alleges that the NYPD Department Advocate's Office prosecutes disciplinary charges against civilian and uniformed members of service accused of violating Department rules, regulations, procedures, and standards of conduct.

67. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY acted as the Department Advocate and/or Executive Agency Counsel responsible for prosecuting disciplinary charges against plaintiff AMRIT P. SINGH before the Office of the Deputy Commissioner of Trials.

68. Plaintiff AMRIT P. SINGH alleges that the Office of the Deputy Commissioner of Trials conducts NYPD disciplinary trials, receives evidence, evaluates witness testimony, makes findings and credibility determinations, prepares reports and recommendations, and recommends penalties to the Police Commissioner.

69. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER acted as Assistant Deputy Commissioner–Trials and presided over plaintiff’s NYPD disciplinary trial.

70. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER made findings, credited prior accusation materials over recanting witnesses, rejected plaintiff’s defensive account, and recommended termination.

71. Plaintiff AMRIT P. SINGH alleges that the NYPD disciplinary process, as applied to him, was not a neutral or lawful employment process because defendants relied upon dismissed, sealed, recanted, and seal-derived criminal accusation materials as the evidentiary foundation for discipline.

72. Plaintiff AMRIT P. SINGH alleges that the NYPD disciplinary process, as applied to him, treated domestic-incident accusation materials as established misconduct even though the related criminal matter had been dismissed and sealed, the principal witnesses later recanted or materially retreated from prior allegations, and no criminal conviction existed.

73. Plaintiff AMRIT P. SINGH alleges that defendants’ disciplinary prosecution, adjudicatory findings, recommendation, and final dismissal were infected by gender-based domestic-violence stereotypes.

74. Plaintiff AMRIT P. SINGH alleges that defendants treated him, a male police officer involved in a domestic-related family dispute, as the presumptive aggressor and failed to meaningfully credit his defensive account, his actual or perceived status as a victim of domestic

violence, or the possibility that the original accusation narrative was incomplete, exaggerated, unreliable, or false.

75. Plaintiff AMRIT P. SINGH alleges that the NYPD disciplinary process applies broad discretionary standards that, absent lawful limits and consistent application, permit arbitrary disciplinary outcomes, selective enforcement, and disparate penalty treatment.

76. Plaintiff AMRIT P. SINGH alleges that allegations of systemic favoritism, bias, or significant inconsistency strike at the legitimacy of any adjudicatory disciplinary system, particularly where the penalty imposed is termination.

77. Plaintiff AMRIT P. SINGH alleges that the NYPD has retained members of service who engaged in serious misconduct, including criminal or potentially criminal conduct, violent misconduct, firearm-related misconduct, dishonesty, abuse of authority, domestic incidents, and other conduct prejudicial to the good order, efficiency, or discipline of the Department.

78. Plaintiff AMRIT P. SINGH alleges that, compared with members of service retained after serious misconduct, his termination after dismissal, sealing, recantation, and an evidentiary record dependent on prior accusation materials reflects arbitrary penalty escalation, disparate treatment, and discriminatory enforcement.

79. Plaintiff AMRIT P. SINGH alleges that the NYPD's discretionary disciplinary process cannot lawfully be used to evade CPL §§ 160.50 and 160.60 or to convert sealed non-conviction accusation materials into a continuing employment disability.

80. Plaintiff AMRIT P. SINGH alleges that, before defendants terminated him, the NYPD had already been placed on judicial notice that sealed arrest and non-conviction

information may not be accessed, used, or repurposed internally for investigatory, disciplinary, or employment purposes absent statutory authorization or a court order.

81. Plaintiff AMRIT P. SINGH alleges that defendants nevertheless used the NYPD disciplinary process as an *ultra vires* administrative continuation of a dismissed and sealed criminal case.

82. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY'S prosecution of the disciplinary matter, defendant JEFF S. ADLER'S findings and recommendation, and defendant JESSICA S. TISCH'S final dismissal decision formed a continuous chain of discriminatory, retaliatory, and unlawful employment action.

**The NYPD Disciplinary Process Uses 'Arbitrary Standards' Supported with the Hypocritical 'Conduct' of the Police Commissioners'**

83. Plaintiff AMRIT P. SINGH alleges that for at least the past four [4] administrations under police commissioners [Edward A. Caban, Keechant L. Sewell, Dermot F. Shea and James P. O'Neill], they knowingly violated NYPD Patrol Guide Procedure No.: 203-10, Page 1, Paragraph 2(c) PUBLIC CONTACT – PROHIBITED CONDUCT GENERAL REGULATIONS: “wrongfully and knowingly associated with a person, reasonably believed to be engaged in, likely to engage in or to have engaged in criminal activities.”

84. Plaintiff AMRIT P. SINGH alleges that former Police Commissioner Edward A. Caban, and its executive management knowingly associate[d] and in some instances still associate with Jimmy Rodriguez, aka Jamie Rodriguez, the former operator of Jimmy's Bronx Café associated with Con Sofrito, formerly located at 1315 Commerce Avenue Bronx, N.Y. 10461. The establishment was owned by the 1315 Restaurant Group Corp. DOS ID: 5690783, registered as a Domestic Business Corporation on January 16, 2020. The registered agent is Mr. Richard Caban, retired lieutenant and brother of former Police Commissioner Caban.

85. Plaintiff AMRIT P. SINGH alleges that Jimmy Rodriguez, aka Jamie Rodriguez, has a criminal history [acknowledged during interviews with several publications, including The New Yorker on November 9, 1997] with recurring allegations related to the sale of narcotics, prostitution, and other criminal conduct within the former Jimmy's Bronx Café and now Con Sofrito.<sup>1</sup>

86. Plaintiff AMRIT P. SINGH alleges that over the past four [4] years, supported by social media posts and other related data, literally hundreds of NYPD personnel patronized Con Sofrito but were not disciplined for violating NYPD Patrol Guide Procedure No.: 203-10, Page 1, Paragraph 2(c) PUBLIC CONTACT – PROHIBITED CONDUCT GENERAL REGULATIONS: “wrongfully and knowingly associated with a person, reasonably believed to be engaged in, likely to engage in or to have engaged in criminal activities.”

87. Plaintiff AMRIT P. SINGH alleges that this is possible because the NYPD Disciplinary System uses ‘Arbitrary Standards’ and ‘lacks transparency’ over the past four [4] administrations under former Police Commissioners Caban, Sewell, Shea and O’Neill and their hypocritical ‘conduct’ including its executive management, supports the proposition of systemic favoritism, bias, and significant inconsistencies how disciplinary cases are initiated, prosecuted, and resolved.

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<sup>1</sup> Moreover, there's some suggestion from a mob associate John Pennisi, Sitdownnews that he and Anthony Guzzo were considering a money and narcotic deal with Jimmy Rodriguez, former owner of Don Coqui, Jimmy's Bronx Café and Jimmy's Uptown who wanted to become a member of the Lucchese Crime family. They believe it was a setup in retaliation for an incident with a Genovese Crime family associate.  
<https://youtu.be/m9Yp342sPEo?si=DYwa8b5a6OMZJMh>



## Jimmy's ConSofrito

Oct 8, 2022 · 🌐

[Mobile uploads](#)

Police Commissioners Keechant L. Sewell, Edward A. Caban and former Chief of Department Kenneth E. Corey



## Jimmy's ConSofrito

Oct 8, 2022 · 🌐

Police Commissioners Keechant L. Sewell and Edward A. Caban



**Jimmy's ConSofrito**

Oct 8, 2022 · 🌐

Jimmy Rodriguez with former Chief of Department Kenneth E. Corey



Mayor Eric L. Adams, Speaker of the New York State Assembly  
Carl E. Heastie with Jimmy Rodriguez



Police Commissioner Edward A. Caban with brothers Richard Caban [owner of 1315 Restaurant Group Corp.] and former NYPD Sergeant James Caban [termination in January 2001]



Jimmy Rodriguez with Patrick J. Lynch, former president of the Police Benevolent Association of the City of New York



Richard Caban [owner of 1315 Restaurant Group Corp.], former Police Commissioner Dermot F. Shea with Jimmy Rodriguez



Jimmy Rodriguez with former Police Commissioner Dermot F. Shea



Police Commissioner Edward A. Caban with Patrick J. Lynch, former president of the Police Benevolent Association of the City of New York



Jimmy Rodriguez with Chief of Housing Martine N. Materasso and Patrick J. Lynch, former president of the Police Benevolent Association of the City of New York



Deputy Commissioner Community Affairs Mark T. Stewart,  
Inspector Victoria C. Perry with unidentified person



Former Chief of Training Juanita N. Holmes and Police Commissioner Edward A. Caban



Jimmy Rodriguez with Deputy Commissioner Equity and Inclusion  
Wendy Garcia [dark clothing with pink shoes]



Jimmy Rodriguez attending the swearing in ceremony of Police Commissioner Edward A. Caban

88. Plaintiff AMRIT P. SINGH alleges that upon information and belief, none of those mentioned above NYPD personnel or the hundreds of other NYPD personnel patronizing Con Sofrito were terminated for violating NYPD Patrol Guide Procedure No.: 203-10, Page 1, Paragraph 2(c) PUBLIC CONTACT – PROHIBITED CONDUCT GENERAL REGULATIONS: “wrongfully and knowingly associated with a person, reasonably believed to be engaged in, likely to engage in or to have engaged in criminal activities.”

**Defendants’ Own Reports Confirm Continuing Transparency  
Deficiencies in the NYPD Disciplinary System**

**The 2016–2017 NYPD Discipline Report**

89. Plaintiff AMRIT P. SINGH alleges that the New York City Police Department published an official report entitled “**Discipline in the NYPD 2016–2017,**” in which the Department described its disciplinary system, its stated objectives, and the manner in which disciplinary matters were investigated and resolved.

90. Plaintiff AMRIT P. SINGH alleges that, in the Introduction to that report, the Department represented that public trust is eroded each time a New York City police officer’s conduct fails to conform to Department values and standards, and further represented that when misconduct is substantiated, discipline is imposed to correct employee misconduct, maintain the orderly functioning of the Department, ensure compliance with high standards of conduct, and assure the public that the Department will hold employees accountable for misconduct.

91. Plaintiff AMRIT P. SINGH alleges that the same report affirmatively states that discipline “must be imposed fairly and with equity,” and defines “equity” to mean that unacceptable behavior for one employee is unacceptable for all employees, “regardless of rank, demographic, assignment or tenure.”

92. Plaintiff AMRIT P. SINGH alleges that, according to the report, the Department receives misconduct complaints from the public, from Department personnel, and from proactive internal investigations, and that such complaints may range from simple policy violations to serious allegations of unlawful or criminal conduct. The report further states that criminal allegations may result in both criminal prosecution and internal disciplinary proceedings.

93. Plaintiff AMRIT P. SINGH alleges that the report identifies the Internal Affairs Bureau as conducting comprehensive investigations of corruption and misconduct complaints, including criminal conduct, and also identifies the Equal Employment Opportunity Division within the Department's Office of Equity and Inclusion as the unit that investigates allegations of employment discrimination and harassment and provides training and advice on equality and fairness in the workplace.

94. Plaintiff AMRIT P. SINGH alleges that the report also recognizes that outside entities examine Department policies and procedures regarding misconduct and discipline, including the Commission to Combat Police Corruption and the Inspector General for the NYPD, thereby acknowledging that oversight of disciplinary integrity and accountability extends beyond the Department's own internal processes.

95. Plaintiff AMRIT P. SINGH alleges that the report states that in calendar year **2017** the NYPD closed discipline cases involving **480 officers**, and that those cases represented **1.3%** of the Department's staff during that year. The report further breaks out those cases by rank and staffing percentages.

96. Plaintiff AMRIT P. SINGH alleges that the report further states that, of the officers charged with disciplinary cases who pleaded guilty or were found guilty in 2017, the majority involved **Department Rule Violations (223 officers)** and **Misconduct Involving**

**Public Interaction (47 officers)**, and that **67%** of those officers had **no prior disciplinary history**.

97. Plaintiff AMRIT P. SINGH alleges that the report separately includes a category labeled “**Domestic Incident**,” showing **23 officers** in 2017 within that category, all of whom were listed as having pleaded or been found guilty, with penalties including dismissals, penalty days, and dismissal probation.

98. Plaintiff AMRIT P. SINGH alleges that the report’s own language is significant because the Department publicly represented that its disciplinary system operated fairly, equitably, and without distinction based on rank, demographic, assignment, or tenure, while also publishing only aggregate disciplinary outcomes rather than the kind of comparator-specific material necessary to test whether that stated principle was consistently honored in practice.

99. Plaintiff AMRIT P. SINGH alleges that the Department’s own 2016–2017 discipline report publicly proclaimed that discipline must be imposed fairly and with equity regardless of rank, demographic, assignment, or tenure, yet disclosed only aggregate disciplinary outcomes, thereby leaving unresolved whether that professed equity was actually borne out in practice and limiting meaningful scrutiny of whether similarly situated officers were treated differently on impermissible grounds.

#### **The 2018 NYPD Discipline Report**

100. Plaintiff AMRIT P. SINGH alleges that in its official report, **Discipline in the NYPD 2018**, the Department again represented that discipline “must be imposed fairly and with equity,” and that unacceptable behavior is unacceptable for all employees “regardless of rank, demographic, assignment or tenure.” The report further stated that each disciplinary matter is

“unique,” requires a comprehensive analysis, and must be evaluated based upon the totality of the circumstances.

101. Plaintiff AMRIT P. SINGH alleges that the Department’s 2018 report also published aggregate statistical data concerning disciplinary outcomes, including that **303 officers** had disciplinary cases resolved in 2018, representing approximately **0.8%** of the Department’s staff. The report further segmented those cases down by rank, stating that **66.0%** involved police officers, **10.9%** detectives, **15.2%** sergeants, **6.6%** lieutenants, and **1.3%** captains and above.

102. Plaintiff AMRIT P. SINGH alleges that the same report further segmented disciplinary cases down by years of service, stating that **56.8%** of charged officers had between **six and fifteen years of service**, and further reported that **292 officers**, or **96%**, either pleaded guilty or were found guilty.

103. The report identified the leading categories of sustained or adjudicated misconduct as including **Department Rule Violations** and **DWI/Alcohol Related Infractions**, and further stated that **35%** of officers who pleaded guilty or were found guilty had **no prior disciplinary history**.

104. Plaintiff AMRIT P. SINGH alleges that the report also included a category labeled “**Domestic Incident**,” reflecting **23 cases** in that category, with **22** resulting in a guilty finding or plea, and penalties including forced separation, dismissal probation with penalty days, and penalty-day dispositions.

105. Plaintiff AMRIT P. SINGH alleges that, although the 2018 report publicly reaffirmed the Department’s stated commitment to fairness and equity and provided broad statistical summaries regarding rank, years of service, charge categories, and penalty outcomes, it

did not provide the comparator-specific transparency necessary to meaningfully test whether similarly situated officers were in fact treated alike in practice.

106. Plaintiff alleges that the Department's own 2018 reporting therefore left unresolved whether its professed principle of equitable discipline was actually being applied consistently and free from selective, retaliatory, or discriminatory enforcement.

#### **The 2019 NYPD Discipline Report**

107. Plaintiff AMRIT P. SINGH alleges that in its official report, **Discipline in the NYPD 2019**, the Department again represented that discipline "must be imposed fairly and with equity," and that unacceptable behavior is unacceptable for all employees "regardless of rank, demographic, assignment, or tenure." The report further stated that each disciplinary matter is unique, requires a comprehensive analysis, and must consider the totality of the circumstances.

108. Plaintiff AMRIT P. SINGH alleges that the Department's 2019 report also published aggregate statistical data concerning disciplinary outcomes, including that **339 UMOS** had disciplinary cases resolved in calendar year 2019, representing **0.9%** of the Department's staff. The report further segmented those cases down by rank, stating that **64.6%** involved police officers, **13.0%** detectives, **14.7%** sergeants, **6.2%** lieutenants, and **1.5%** captains and above.

109. Plaintiff AMRIT P. SINGH alleges that the same report further segmented disciplinary cases down by years of service, stating that **50.2%** of UMOS with disciplinary charges in 2019 had between **six and fifteen years of service**. The report additionally stated that, in 2019, there were **79 department trials**, of which **13 UMOS** pleaded guilty and had a mitigation hearing, **49 UMOS** were found guilty of at least one charge after trial, and **17 UMOS** were found not guilty of all charges.

110. Plaintiff AMRIT P. SINGH alleges that the report further stated that **322**, or **95%**, of UMOS charged with a disciplinary case either pleaded guilty and entered into settlement agreements or were found guilty after trial. The report identified the leading categories of adjudicated or sustained misconduct as including **Department Rule Violations (187 UMOS)**, **DWI/Alcohol Related infractions (25 UMOS)**, **Force (18 UMOS)**, **Domestic Incident (17 UMOS)**, **Misconduct Involving Public Interaction (17 UMOS)**, **False Statements (20 UMOS)**, **Firearms (16 UMOS)**, **Unlawful/Criminal Conduct (18 UMOS)**, **Narcotics Related (2 UMOS)**, and **Sexual Misconduct (2 UMOS)**. The report further stated that **26%** of UMOS who pleaded guilty or were found guilty after trial had **no prior disciplinary history**.

111. Plaintiff AMRIT P. SINGH alleges that the report also included a category labeled “**Domestic Incident**,” reflecting **17 cases** in that category, with **17** resulting in a guilty finding or plea, and penalties including **1 dismissal**, **2 forced separations**, **8 dismissal-probation-and-penalty-day dispositions**, and **6 penalty-day dispositions**. The report further stated that, of the **322 UMOS** who pleaded guilty or were found guilty after trial, **3.1%** were dismissed, **5.3%** submitted for service or vested retirement, **29.2%** received dismissal probation with forfeited penalty days, and reprimand was not used in any disciplinary case closed in 2019.

112. Plaintiff AMRIT P. SINGH alleges that, although the 2019 report publicly reaffirmed the Department’s stated commitment to fairness and equity and provided broad statistical summaries regarding rank, years of service, charge categories, and penalty outcomes, it did not provide the comparator-specific transparency necessary to meaningfully test whether similarly situated officers were in fact treated alike in practice.

113. Plaintiff AMRIT P. SINGH alleges that the Department's own 2019 reporting therefore left unresolved whether its professed principle of equitable discipline was actually being applied consistently and free from selective, retaliatory, or discriminatory enforcement.

#### **The 2020 NYPD Discipline Report**

114. Plaintiff AMRIT P. SINGH alleges that in its official report, **2020 Discipline Report**, the Department represented that it was committed to a "fair, effective, timely, and transparent disciplinary process." The report further stated that discipline must be imposed fairly and with equity, and that unacceptable behavior for one employee is unacceptable for all, regardless of rank, demographic, assignment, or tenure.

115. Plaintiff AMRIT P. SINGH alleges that the same report also emphasized that each disciplinary matter is unique, requires a comprehensive analysis, and must consider the totality of the circumstances, including mitigating and aggravating factors, disciplinary history, and the number of charges in a case.

116. Plaintiff AMRIT P. SINGH alleges that the Department's 2020 report published aggregate statistical data concerning disciplinary outcomes, including that **619 cases** in which charges were preferred were disposed of with a penalty in 2020, of which **489 cases (79.0%)** involved uniformed members of the service and **130 cases (21.0%)** involved civilian members of the service. Plaintiff further alleges that the report stated that **49 members** were subject to forced separation from Department employment in 2020 as a result of disciplinary matters.

117. Plaintiff AMRIT P. SINGH alleges that the report further summarized the disciplinary process through aggregate measures, including the volume of cases, broad categories of penalties, and overall case outcomes, rather than through comparator-specific disclosures that

would permit meaningful case-to-case analysis of whether similarly situated employees were treated consistently.

118. Plaintiff AMRIT P. SINGH alleges that, although the 2020 report publicly reaffirmed the Department's stated commitment to fairness, equity, and transparency, the report continued to present disciplinary information in broad statistical form and did not provide the degree of comparator-level transparency necessary to meaningfully test whether similarly situated officers were in fact treated alike in practice.

119. Plaintiff AMRIT P. SINGH alleges that the Department's own 2020 reporting therefore left unresolved whether its professed principle of equitable discipline was actually being applied consistently and free from selective, retaliatory, or discriminatory enforcement.

#### **The 2021 NYPD Discipline Report**

120. Plaintiff AMRIT P. SINGH alleges that in its official report, **2021 Discipline Report**, the Department represented that it was committed to a "fair, effective, timely, and transparent disciplinary process." The report further stated that discipline must be imposed fairly and with equity, and that unacceptable behavior for one employee is unacceptable for all, regardless of rank, demographic, assignment, or tenure.

121. Plaintiff AMRIT P. SINGH alleges that the same report emphasized that each disciplinary matter is unique, requires a comprehensive analysis, and must consider the totality of the circumstances, including mitigating and aggravating factors, disciplinary history, and the number of charges in a case.

122. Plaintiff AMRIT P. SINGH alleges that the Department's 2021 report also published aggregate statistical data concerning disciplinary outcomes, including that in 2021 more than **13,300 penalty days** were forfeited by members of the service in disciplinary cases,

that **72 members** were subject to forced separation from Department employment as a result of disciplinary matters, and that as of **December 31, 2021**, there were **984 active cases** with charges preferred against members of the service.

123. Plaintiff AMRIT P. SINGH alleges that the 2021 report also highlighted what the Department characterized as “transformative changes” in transparency and accountability, including the release of disciplinary guidelines, publication of deviation explanations, trial decisions, and other public-facing materials concerning disciplinary outcomes.

124. Plaintiff AMRIT P. SINGH alleges that, notwithstanding those claimed reforms, the 2021 report continued to present discipline information in broad aggregate form rather than through comparator-specific disclosures that would permit meaningful case-to-case testing of whether similarly situated employees were treated consistently.

125. Plaintiff AMRIT P. SINGH alleges that the Department’s own 2021 reporting therefore continued to leave unresolved whether its professed commitment to fairness, equity, and transparency was being carried out consistently in practice and free from selective, retaliatory, or discriminatory enforcement.

### **The 2022 NYPD Discipline Report**

126. Plaintiff AMRIT P. SINGH alleges that in its official report, **Discipline in the NYPD 2022**, the Department continued to represent that it was committed to a “fair, effective, timely, and transparent disciplinary process.” The report further stated that discipline must be imposed fairly and equitably, and that unacceptable behavior for one employee is unacceptable for all, regardless of rank, demographic, assignment, or tenure.

127. Plaintiff AMRIT P. SINGH alleges that the same report again emphasized that each disciplinary matter is “unique,” requires a comprehensive analysis, and must consider the

totality of the circumstances, including mitigating and aggravating factors, disciplinary history, and the number of charges in a case.

128. Plaintiff AMRIT P. SINGH alleges that the Department's 2022 report published aggregate statistical data concerning disciplinary outcomes, including those members of the service forfeited more than **13,272 penalty days** in 2022, that **84 members** were subjected to forced separation from Department employment as a result of disciplinary action, and that as of **December 31, 2022**, there were **1,097 active cases** with charges preferred against members of the service.

129. Plaintiff AMRIT P. SINGH alleges that the 2022 report further stated that the Department preferred **54.2%**, or **570**, of active cases with charges, while the CCRB preferred **45.8%**, or **482**, and that as of **December 31, 2022**, **806 uniformed members of the service**, representing **2.3%** of the uniformed workforce, had active charges and specifications.

130. Plaintiff AMRIT P. SINGH alleges that the 2022 report also described what the Department characterized as expanded transparency measures, including continued public use of the internal discipline matrix, publication of written deviation explanations, operation of the Officer Profile Portal, and public access to trial decisions.

131. Plaintiff AMRIT P. SINGH alleges that, notwithstanding those claimed transparency measures, the Department expressly admitted in the same 2022 report that its formal discipline data are stored in a **case-management style database**, that the purpose of that database is to manage cases rather than to catalog and manipulate data, and that **lateral comparisons** are difficult because mitigating and aggravating factors, the number of charges per case, and disciplinary history make each case unique.

132. Plaintiff AMRIT P. SINGH alleges that the Department further stated that, as a result of those limitations, the 2022 report was confined to “broad data points” such as intake volume, active cases, case length, and separations, rather than the kind of comparator-specific data necessary to permit meaningful scrutiny of whether similarly situated members were treated consistently.

133. Plaintiff AMRIT P. SINGH alleges that the 2022 report also included demographic data concerning closed disciplinary cases involving charges preferred against uniformed members of the service, stating that **White officers comprised 43.6% of UMOS and 36.2% of closed cases, Black officers comprised 15.5% of UMOS and 19.9% of closed cases, Hispanic officers comprised 30.6% of UMOS and 33.0% of closed cases, and Asian-American/Pacific Islander officers comprised 10.2% of UMOS and 10.6% of closed cases.**

134. Plaintiff AMRIT P. SINGH alleges that the same report further included gender data for uniformed members of the service, stating that **male officers comprised 80.4% of UMOS but 84.3% of closed disciplinary cases, while female officers comprised 19.6% of UMOS and 15.7% of closed disciplinary cases.**

135. Plaintiff AMRIT P. SINGH alleges that the 2022 report also stated that **police officers comprised 71.0%** of uniformed members with charges preferred in closed cases, compared to **10.1%** for detectives, **11.4%** for sergeants, **5.1%** for lieutenants, and **2.4%** for captains and above.

136. Plaintiff AMRIT P. SINGH alleges that, although the 2022 report publicly reaffirmed the Department’s stated commitment to fairness, equity, and transparency, and although it disclosed broad data regarding discipline volume, demographics, rank, and penalties,

the Department simultaneously admitted that its own system was not structured for the cataloging and manipulation of data necessary for meaningful lateral comparison across cases.

137. Plaintiff AMRIT P. SINGH alleges that the Department's own 2022 reporting therefore continued to leave unresolved whether its professed principles of equitable and transparent discipline were being applied consistently in practice, and continued to limit meaningful scrutiny of whether similarly situated officers were treated differently in disciplinary matters.

#### **The 2023 NYPD Discipline Report**

138. Plaintiff AMRIT P. SINGH alleges that in its official report, **Discipline in the NYPD 2023**, the Department again represented that it "continues to be committed to a fair, effective, timely, and transparent disciplinary process." The report further stated that discipline must be imposed fairly and equitably, and that all employees are to be held accountable regardless of rank, demographic, assignment, or tenure.

139. Plaintiff AMRIT P. SINGH alleges that the same report again emphasized that each disciplinary matter is unique, requires a comprehensive analysis, and must consider the totality of the circumstances, including mitigating and aggravating factors, disciplinary history, and the number of charges in a case.

140. Plaintiff AMRIT P. SINGH alleges that the Department's 2023 report published aggregate statistical data concerning disciplinary activity, including that in 2023 there were **1,720 disciplinary cases** referred to the Department for investigation, that as of **December 31, 2023**, **967 members of the service**, or **2.9%**, had active investigations of serious misconduct, that members of the service forfeited **12,768 penalty days** due to disciplinary cases, and that **78**

**members** were subjected to forced separation from the Department as a result of disciplinary action.

141. Plaintiff AMRIT P. SINGH alleges that the 2023 report further stated that the Department and CCRB each contributed nearly half of all disciplinary intake in 2023, with **862 cases** initiated by the CCRB and **858 cases** initiated by the Department, and that as of **December 31, 2023**, there were **1,079 active cases** in which charges had been preferred.

142. Plaintiff AMRIT P. SINGH alleges that the 2023 report also included demographic data concerning closed disciplinary cases involving uniformed members of the service. The report stated that **White officers comprised 41.9% of UMOS and 33.5% of closed cases, Black officers comprised 15.9% of UMOS and 20.1% of closed cases, Hispanic officers comprised 31.5% of UMOS and 37.8% of closed cases, and Asian-American/Pacific Islander officers comprised 10.7% of UMOS and 8.6% of closed cases.**

143. Plaintiff AMRIT P. SINGH alleges that the same report further included gender data for uniformed members of the service, stating that **male officers comprised 79.7% of UMOS but 87.5% of closed disciplinary cases, while female officers comprised 20.2% of UMOS but only 12.5% of closed disciplinary cases.**

144. Plaintiff AMRIT P. SINGH alleges that the 2023 report also included rank data for uniformed members of the service, stating that **police officers comprised 64.7% of UMOS but 70.0% of closed disciplinary cases, while detectives comprised 15.3% of UMOS and 9.7% of closed disciplinary cases, sergeants comprised 12.8% of UMOS and 12.1% of closed disciplinary cases, lieutenants comprised 4.9% of UMOS and 6.0% of closed disciplinary cases, and captains and above comprised 2.3% of UMOS and 2.2% of closed disciplinary cases.**

145. Plaintiff AMRIT P. SINGH alleges that the 2023 report also described what the Department characterized as transparency measures, including public release of the Discipline Matrix, use of written deviation explanations, operation of the Officer Profile Portal, and publication of trial decisions.

146. Plaintiff AMRIT P. SINGH alleges that, notwithstanding those claimed transparency measures, the Department expressly admitted in the same 2023 report that its formal discipline data are stored in a **case management database** intended to manage cases rather than to catalog and manipulate data, that the complexity of individual cases makes **lateral comparisons difficult**, and that the report is therefore limited to broad data points such as intake volume, active cases, case length, and separations.

147. Plaintiff AMRIT P. SINGH alleges that the 2023 report also acknowledged that when a department employee is charged criminally with a violation of federal or state law, the Department also files internal disciplinary charges because criminal conduct is treated as a violation of Department policy, and further acknowledged that disciplinary matters involving parallel criminal prosecutions may proceed in tandem where the Department determines that doing so will not compromise the criminal case.

148. Plaintiff AMRIT P. SINGH alleges that, although the 2023 report publicly reaffirmed the Department's stated commitment to fairness, equity, and transparency, and although it disclosed broad data concerning discipline volume, demographics, rank, penalties, and case processing, the Department simultaneously admitted that its own system was not structured for the cataloging and manipulation of data necessary for meaningful lateral comparison across cases.

149. Plaintiff AMRIT P. SINGH alleges that the Department's own 2023 reporting therefore continued to leave unresolved whether its professed principles of equitable and transparent discipline were being applied consistently in practice, and continued to limit meaningful scrutiny of whether similarly situated officers were treated differently in disciplinary matters.

**The Department's Own Reports Support Plaintiff's Claims of  
Continuing Transparency Failures**

150. Plaintiff AMRIT P. SINGH alleges that, taken together, the Department's own disciplinary reports and review materials demonstrate a continuing pattern under defendant THE CITY OF NEW YORK and successive NYPD administrations: the NYPD repeatedly proclaimed that its disciplinary system was fair, equitable, and transparent, while simultaneously maintaining a reporting structure that, by the Department's own description, was too limited to permit meaningful lateral comparison across materially similar cases.

151. Plaintiff AMRIT P. SINGH alleges that this continuing lack of comparator-specific transparency is not collateral or academic. It bears directly on plaintiff's ability to test whether the discipline imposed against him, defendants' use of dismissed and sealed criminal accusation materials, defendants' handling of domestic-violence-related allegations, and defendants' termination decision were consistent with the treatment of similarly situated members of service or instead reflected selective discipline, unequal treatment, retaliation, gender bias, arrest-history discrimination, domestic-violence-status discrimination, or other unlawful bias.

152. Plaintiff AMRIT P. SINGH alleges that defendants THE CITY OF NEW YORK and JESSICA S. TISCH maintained, implemented, enforced, ratified, and/or permitted the continuation of a disciplinary reporting and review structure that invoked the appearance of

fairness, equity, and transparency while withholding the kind of reliable, comparator-level disclosure necessary for meaningful scrutiny of consistency in disciplinary decision-making, including deviations from stated standards and the treatment of similarly situated officers.

153. Plaintiff AMRIT P. SINGH further alleges that defendant JESSICA S. TISCH adopted plaintiff's termination in 2026 against the backdrop of this longstanding transparency failure, including years of Department reports acknowledging broad aggregate disciplinary data while failing to provide case-level comparator information necessary to determine whether termination was imposed consistently, selectively, or discriminatorily.

154. Plaintiff AMRIT P. SINGH alleges that the Department's 2024 and 2025 disciplinary reports were unavailable to plaintiff at the time of this pleading. Plaintiff therefore does not rely upon any specific 2024 or 2025 report language at this stage. However, based upon the Department's own 2016 through 2023 public disciplinary reports, plaintiff alleges upon information and belief that the Department's disciplinary reporting structure continued through 2024 and 2025 to lack the comparator-level transparency necessary to test whether members of service accused of serious misconduct, including criminal or potentially criminal conduct, were treated more favorably than plaintiff.

155. Plaintiff AMRIT P. SINGH alleges that the unavailability of meaningful comparator-level disciplinary information, including unavailable or incomplete 2024 and 2025 reporting, further supports plaintiff's claim that defendants controlled the information necessary to test consistency, equity, and penalty proportionality within the NYPD disciplinary system during the period when plaintiff's disciplinary case was pending, tried, recommended for termination, and finalized.

156. Plaintiff AMRIT P. SINGH alleges that this information asymmetry is material because defendants terminated plaintiff after dismissal, sealing, recantation, and reliance upon prior accusation materials, while the Department's own public reporting does not permit meaningful assessment of whether members of service who engaged in serious misconduct, including criminal conduct, violent conduct, firearm-related misconduct, dishonesty, abuse of authority, or domestic incidents, were retained despite more aggravated or better-proven misconduct.

#### **The Unlawful Use of Sealed Records in the NYPD Disciplinary Process**

157. Plaintiff AMRIT P. SINGH alleges that New York law prohibits the use of criminal matters terminated in favor of the accused and sealed under CPL §§ 160.50 and 160.60 as a basis for adverse employment treatment, except where disclosure or use is expressly authorized by statute or court order.

158. Plaintiff AMRIT P. SINGH alleges that the sealing statutes were enacted to ensure that a person whose criminal case terminates in his favor does not continue to suffer stigma, disqualification, or adverse consequences based merely upon an accusation that was not sustained in court.

159. Plaintiff AMRIT P. SINGH alleges that *Matter of Joseph M. v. New York State Police*, 82 N.Y.2d 128 (1993), makes clear that CPL § 160.50 imposes a general proscription against the release and use of sealed records, subject only to narrowly drawn statutory exceptions, and that courts do not possess inherent discretionary authority to unseal records for employment discipline absent statutory authorization.

160. Plaintiff AMRIT P. SINGH alleges that the NYPD was placed on direct judicial notice of these sealing-law limits through *R.C. v. City of New York*, 64 Misc. 3d 368 (Sup. Ct.,

N.Y. County 2019), which addressed the NYPD's policy and practice of maintaining, using, and disclosing sealed arrest records in violation of CPL §§ 160.50 and 160.55.

161. In *R.C. v. City of New York*, 64 Misc. 3d 368 (Sup. Ct., N.Y. County 2019), the court rejected the NYPD's position that sealed arrest information could be accessed or used internally for investigatory, disciplinary, or other Department purposes merely because the information remained within the NYPD.

162. Plaintiff AMRIT P. SINGH alleges that the 2019 *R.C.* decision is material because it rejected the same internal-use theory implicated here: that the NYPD may repurpose sealed arrest or prosecution information inside the Department for employment, investigatory, or disciplinary purposes without statutory authorization or a court order.

163. Plaintiff AMRIT P. SINGH alleges that, on September 27, 2021, in *R.C. v. City of New York*, Index No. 153739/2018, NYSCEF Doc. No. 200 (Sup. Ct., N.Y. County Sept. 27, 2021), the Supreme Court, New York County, granted preliminary injunctive relief against the City and NYPD concerning the Department's handling of sealed arrest information.

164. In the September 27, 2021 Decision and Order, the court held that the NYPD defendants "freely admit[ted]" that their prior training regarding the sealing of records was contrary to law, and further held that sealed records may not be used for investigatory purposes without a properly obtained unsealing order, except as permitted by enumerated statutory exceptions and applicable case law.

165. Plaintiff AMRIT P. SINGH alleges that the September 27, 2021 Decision and Order further found it concerning that more than **800** people within the NYPD had access to sealed records, and held that such breadth of access itself ran afoul of the sealing statutes.

166. Plaintiff AMRIT P. SINGH alleges that the September 27, 2021 Decision and Order enjoined the City and NYPD from instructing NYPD personnel in a manner that violates the sealing statutes, required corrective guidance concerning NYPD access to sealed arrest information, and directed the City to submit a compliance plan concerning cessation of the use of sealed records for investigatory purposes unless an unsealing order had been obtained or a recognized exception applied.

167. Plaintiff AMRIT P. SINGH alleges that the City and NYPD were therefore on actual notice, no later than April 29, 2019, and again no later than September 27, 2021, that sealed arrest and non-conviction information could not be used internally as an investigatory, disciplinary, or employment shortcut absent statutory authorization or a court order.

168. Plaintiff AMRIT P. SINGH alleges that, in *R.C. v. City of New York*, 2024 N.Y. Slip Op. 03017 (1st Dep't June 4, 2024), the Appellate Division, First Department vacated a later permanent implementing order as premature and overbroad, but expressly held that the preliminary-injunction order remained in full force and effect.

169. Plaintiff AMRIT P. SINGH alleges that the First Department's 2024 decision did not authorize the NYPD to use sealed arrest or prosecution information for internal disciplinary purposes without statutory authorization or a court order, and did not disturb the underlying principle that the sealing statutes protect individuals from adverse consequences and stigma based merely on accusations not sustained in court.

170. Plaintiff AMRIT P. SINGH alleges that defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY acted against this legal backdrop when they prosecuted, adjudicated, recommended, adopted, ratified, and enforced plaintiff's termination based upon dismissed and sealed criminal accusation materials, domestic-

incident records, prior out-of-court statements, interview materials, and related accusation evidence.

171. Plaintiff AMRIT P. SINGH alleges that defendants' use of those materials was not a lawful disciplinary act merely because it occurred inside an NYPD disciplinary proceeding.

172. Plaintiff AMRIT P. SINGH alleges that the NYPD may not evade CPL §§ 160.50 and 160.60 by converting sealed criminal accusation materials into internal disciplinary evidence and then imposing adverse employment consequences based upon those materials.

173. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY personally participated in the challenged conduct by prosecuting the disciplinary matter through reliance upon dismissed, sealed, recanted, or seal-derived accusation materials.

174. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER personally participated in the challenged conduct by crediting prior accusation materials over recanting witnesses and giving operative disciplinary effect to dismissed, sealed, recanted, or seal-derived criminal accusation materials.

175. Plaintiff AMRIT P. SINGH alleges that defendant JESSICA S. TISCH personally participated in the challenged conduct by adopting, ratifying, approving, and executing the final dismissal of plaintiff from the Police Department City of New York based upon the disciplinary record, findings, recommendation, and accusation materials challenged herein.

176. Plaintiff AMRIT P. SINGH alleges that defendants' use of dismissed and sealed criminal accusation materials infected the fairness of the NYPD disciplinary process, permitted adverse inferences to be shaped by arrest-related information that New York law required to be sealed, and converted a terminated criminal matter into a continuing employment disability.

**Defendants' Control Over Prior Disciplinary Files, Comparator Outcomes, and Settlements**

177. Plaintiff AMRIT P. SINGH alleges that defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY, through the NYPD's disciplinary infrastructure, maintained, accessed, used, and/or relied upon an extensive body of prior disciplinary matters, including charges, specifications, negotiated resolutions, plea agreements, penalty recommendations, trial decisions, deviation determinations, final Police Commissioner decisions, settlement outcomes, and disciplinary histories.

178. Plaintiff AMRIT P. SINGH alleges that this body of prior disciplinary information functions as an internal comparative record of disciplinary treatment within the NYPD.

179. Plaintiff AMRIT P. SINGH alleges that the Department may use that internal comparative record to assess prior cases, evaluate penalties, invoke precedent, argue aggravation or mitigation, negotiate resolutions, recommend discipline, justify deviations, and position current cases against prior disciplinary outcomes.

180. Plaintiff AMRIT P. SINGH alleges that defendants had access to materially more comparator information than plaintiff, his counsel, or similarly situated members of service facing discipline.

181. Plaintiff AMRIT P. SINGH alleges that plaintiff, his counsel, and similarly situated officers did not have ready, equal, or meaningful access to the same full universe of prior disciplinary cases, negotiated resolutions, penalty recommendations, final determinations, settlements, and outcomes necessary to test whether disciplinary standards were being applied consistently.

182. Plaintiff AMRIT P. SINGH alleges that this asymmetry in access is material because defendants could rely upon prior cases, prior outcomes, internal disciplinary practice,

and confidential or non-public comparator information when making charging decisions, prosecutorial decisions, adjudicatory determinations, penalty recommendations, and final disciplinary decisions.

183. Plaintiff AMRIT P. SINGH alleges that, by contrast, plaintiff was denied comparable visibility into the full set of matters necessary to identify similarly situated comparators, test penalty proportionality, and challenge selective treatment, retaliation, gender bias, arrest-history discrimination, domestic-violence-status discrimination, and unlawful reliance on sealed records.

184. Plaintiff AMRIT P. SINGH alleges that the Department's control over prior disciplinary files, comparator outcomes, negotiated settlements, deviation determinations, and final Police Commissioner decisions contributed to the lack of meaningful transparency alleged herein.

185. Plaintiff AMRIT P. SINGH alleges that this lack of transparency impaired his ability to determine whether the discipline imposed against him was consistent with the treatment of similarly situated members of service or instead reflected selective discipline, unequal treatment, retaliation, gender-based domestic-violence stereotyping, arrest-history discrimination, domestic-violence-status discrimination, and/or other unlawful bias.

186. Plaintiff AMRIT P. SINGH alleges that this imbalance is especially significant because the Department publicly proclaims fairness, equity, consistency, and transparency while preserving an internal disciplinary record that is not equally and readily accessible to officers subjected to discipline.

187. Plaintiff AMRIT P. SINGH alleges that the asymmetry is also significant because plaintiff was terminated after dismissal, sealing, recantation, and reliance upon prior accusation

materials, while publicly available information and comparator discovery are expected to show that other members of service accused of serious misconduct, including criminal or potentially criminal conduct, remained employed.

188. Plaintiff AMRIT P. SINGH alleges that defendants' exclusive or superior control over comparator information allowed defendants to present plaintiff's termination as a neutral disciplinary outcome while limiting plaintiff's ability to test whether similarly situated or more culpable officers received lesser penalties.

189. Plaintiff AMRIT P. SINGH alleges that defendants' control over comparator evidence is material to his claims for arrest-history discrimination, gender discrimination, discrimination based upon actual or perceived status as a victim of domestic violence, retaliation, unlawful use of sealed records, disparate penalty treatment, and related relief.<sup>2</sup>

**Table I: Master Comparator List (Disparate Treatment and Retention of Employees with Arrest Histories) - Pre-Trial<sup>3</sup>**

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<sup>2</sup> The lack of transparency is apparent from the Department's own reporting structure. The NYPD publicly reports broad aggregate disciplinary data while acknowledging that its formal discipline data are stored in a case-management database intended to manage cases rather than to catalog and manipulate data for meaningful lateral comparison. At the same time, negotiated settlements, plea resolutions, penalty agreements, and mitigation outcomes are not disclosed in a manner that permits reliable case-to-case comparison. This omission is not a technical reporting gap.

It conceals the most important comparator category in the disciplinary system: the cases resolved before trial, where the Department exercises its broadest discretion, selects penalties, avoids written adjudication, and permits members accused of serious misconduct to remain employed. Without disclosure of negotiated settlements and comparable resolutions, public "transparency" does not permit meaningful assessment of whether plaintiff AMRIT P. SINGH was treated consistently with similarly situated members or was singled out for harsher treatment. See, e.g., the Department's own 2022 and 2023 reporting, which describes aggregate outcomes and admits structural limits on lateral comparison while omitting the comparator-level settlement data necessary to test disciplinary equity.

<sup>3</sup> The longitudinal data set forth in **Table I** serves as a verified anchor proving that the

This table establishes the baseline for **Arrest History Discrimination** by documenting the retention of officers despite convictions or admissions of violent and dishonest acts.

Year	Name	Tax #	M / F	Offense(s)	Penalty	Fired
2008	Kaz R. Daughtry	940052	M	<b>Judicial Finding of False Testimony:</b> U.S. District Court found testimony regarding a defendant's status was <b>false</b> .	No Action Documented	<b>No</b>
2008	Kaz R. Daughtry	940052	M	<b>Computer Misuse:</b> Substantiated allegation of department rules and violations.	Schedule B Command Discipline	<b>No</b>
2009	Kaz R. Daughtry	940052	M	<b>Excessive Force/Abuse of Authority:</b> Pointed firearm at civilian and threatened: "I will fucking kill you"	Forfeiture of 10 Vacation Days	<b>No</b>

NYPD operates an arbitrary disciplinary system that routinely retains members of service despite substantiated acts of moral turpitude, violence, and criminal convictions.

This decade-long record demonstrates that the Department's purported "Zero-Tolerance" policies for offenses such as **Assault**, **Strangulation**, and **Endangering the Welfare of a Child**—as seen in the cases of Officers **Augustin**, **Sanchez**, **Nunez**, and **Korycki**—are selectively bypassed through the use of "unreviewable" dismissal probation.

Furthermore, the Department's practice of granting discretionary promotions to officers with criminal convictions, such as **Lieutenant Mullan** and **Detective Gries**, illustrates a systemic culture of nepotism that contradicts the assertion that such conduct poses an "unreasonable risk to the public". By maintaining a dual standard of justice that shields favored or well-connected officers like **Kaz R. Daughtry** from termination despite judicial findings of **False Testimony**, the Defendants have established an arbitrary threshold for "Integrity" that discriminates against individuals on the basis of their arrest history while weaponizing felony statutes against others.

Year	Name	Tax #	M / F	Offense(s)	Penalty	Fired
2012	Kaz R. Daughtry	940052	M	<b>Department Rule Violation:</b> Substantiated failure to request patrol supervisor for off-duty member incident.	Forfeiture of 8 Vacation Days	No
2013	Rohan L. Shaw	919965	M	<b>Insurance Fraud:</b> Pled guilty to "rate jumping," a version of insurance fraud.	Forfeiture of 25 Vacation Days	No
2015	Joseph M. Essig	956626	M	<b>Arrested:</b> Felony Criminal Sexual Misconduct; Pled to Health Code violation.	\$1,000 fine; Restored to full duty	No
2017	Marissa Sorocco	937119	F	<b>Arrested:</b> Arson (5th Degree) and Criminal Mischief (4th Degree).	30-Day Pay Forfeit; 1-Year Dismissal Probation.	No
2017	Mary Mullan	922843	F	<b>Arrested:</b> Drunk Driving (DWI) involving an accident.	23-Day Suspension; 20-Day Vacation Loss; <b>Promoted.</b>	No
2017	Jeffrey Augustin	944210	M	<b>Arrested:</b> Choking wife and threatening to kill her.	13-Day Suspension; 1-Year Dismissal Probation.	No
2018	Handoly Ramos	953297	M	Associated with criminals; Improper computer use; Misleading statements.	35-Day Vacation Loss; 1-Year Dismissal Probation.	No

Year	Name	Tax #	M / F	Offense(s)	Penalty	Fired
2018	Edel D. Sanchez	935686	M	<b>Internal Finding of Choking:</b> Charged with Felony Strangulation and Assault.	26-Day Pay Forfeit; 30-Day Vacation Loss; 1-Year Probation.	No
2018	Victor J. Cruz	957501	M	<b>Arrested:</b> Assault of girlfriend.	1-Year Dismissal Probation; Docked suspension days.	No
2018	Anthony Amirally	939872	M	<b>Internal Finding of Assault:</b> Arrested for choking his mother.	32-Day Suspension; 12-Month Dismissal Probation.	No
2018	Nalik O. Zeigler	951461	M	<b>Arrested:</b> DWI involving crashing into parked cars.	1-Year Dismissal Probation; Retained in Intelligence Bureau.	No
2019	Rohan L. Shaw	919965	M	<b>Fatal MVA:</b> Speeding (85 mph); .108 BAC; Refused all testing.	5 Department Charges mirroring arrest.	No
2019	Kaz R. Daughtry	940052	M	<b>Equipment Violation:</b> Failure to safeguard Body Worn Camera.	Schedule B Command Discipline.	No
2019	Philip H. Case	932140	M	<b>Pled Guilty:</b> Disorderly Conduct; Internal finding of Menacing (pulled gun in road rage).	1-Year Dismissal Probation; Docked vacation days.	No

Year	Name	Tax #	M / F	Offense(s)	Penalty	Fired
2019	Chon Huang	960687	M	<b>Internal Finding of Assault:</b> Arrested for punching an e-bike driver.	30-Day Suspension; 1-Year Dismissal Probation.	No
2020	Oscar H. Nunez	935412	M	<b>Pled Guilty:</b> DWAI; Endangering Welfare of a Child; Unfit for Duty; Physical Altercation.	25-Day Vacation Loss; 1-Year Dismissal Probation.	No
2020	Rafal Korycki	952946	M	<b>Pled Guilty:</b> Endangering Welfare of a Child; Criminal Trespass; Criminal Mischief.	34-Day Vacation Loss; 1-Year Dismissal Probation.	No
2020	Chris Alvarado	933607	M	<b>Convicted:</b> Drunken off-duty incident; Fled scene; Impeded investigation.	Decision overturned by Commissioner; Remained on job.	No
2020	Nelson Reyes	953309	M	<b>Admitted:</b> Assaulted wife (smacked her in the chin).	35-Day Vacation Loss; 1-Year Dismissal Probation.	No
2020	Omar Salem	943768	M	<b>Guilty:</b> Physical altercation; Pushed and held wife down.	30-Day Pay Forfeit; 1-Year Dismissal Probation.	No
2021	Kaz R. Daughtry	940052	M	<b>Misleading Statements:</b> Pled guilty to misleading and inaccurate statements.	20-Day Vacation Loss.	No

Year	Name	Tax #	M / F	Offense(s)	Penalty	Fired
2021	Chris Valencia	963788	M	<b>Arrested:</b> Strangled, held prisoner, and bit girlfriend.	Offered ACD; Retained on Modified Duty.	No
2022	Aliea S. Persaud	951048	F	<b>Arrested/Pled:</b> Assault and Criminal Mischief (Domestic Dispute).	15-Day Vacation Loss; 1-Year Dismissal Probation.	No
2023	Willie Thompson	958120	M	Sexual relations with witness; Intimidating/threaten witness.	30-Day Vacation Loss; 1-Year Dismissal Probation.	No

**Table II: Official Misconduct & Coordinated Nonfeasance (The Shaw Case) - Pre-Trial<sup>4</sup>**

<sup>4</sup> The investigation into the December 8, 2019, fatal motor vehicle accident involving **Rohan L. Shaw [Tax #919965]** serves as a definitive anchor for the Department's arbitrary and capricious disciplinary standards, where a "Zero-Prosecution" threshold was established for the officers involved despite a civilian fatality.

Under the **Verified Anchor Rule** of *People v. Herlihy*, Duty Captain **Robert J. Dantone [946895]** and Lieutenant **Michael H. Solowitz [923197]** committed actionable **Official Misconduct** by failing to perform their "special duty" to suppress the intentional concealment of evidence by subordinates.

This coordinated nonfeasance included Sergeant **Christopher Muller [925795]** pointing his Body-Worn Camera (BWC) at the ceiling to avoid recording Shaw's intoxication and the collective failure of responders **Woodburn [947617]**, **Schwartz [961262]**, and **Grella [952810]** to activate BWCs at a fatal crime scene. Per *Sharp v. Erie R. Co.*, these officers were "liable to prosecution" for failing to arrest Shaw for a DUI committed in their presence, yet they received only negligible administrative penalties such as "2-day vacation loss" or "Letters of Instruction."

This disparate application of the law stands in direct contrast to the 2026 felony indictments of **Michael A. Caligiuri** and **Ryan P. McLoughlin** for similar BWC manipulation, proving that the Department weaponizes criminal statutes against some while granting immunity to others who facilitate a high-profile cover-up.

This table chronicles the specific timeline of the **Rohan L. Shaw [Tax #919965]** cover-up, where high-ranking officers and responders committed acts of **Official Misconduct** without criminal charge. This alignment demonstrates that while the 2026 felony comparators face indictment for evidence tampering, the officers involved in the 2019 fatal MVA investigation were granted administrative immunity or negligible penalties for the same category of **Official Misconduct**.

Year	Name	Tax No.	M/ F	Role	Misconduct (Dec 8, 2019 Fatal MVA)	Penalty
2020	Sean F. Kelleher	901759	M	Responder	Failed to activate BWC during transport of intoxicated officer.	None
2020	Terrence Creighton	921241	M	Cousin	Unauthorized crime scene entry; retrieved Shaw's Glock.	2-Day Vac. Loss
2020	Michael Solowitz	923197	M	Lieutenant	Failed to activate BWC; questioned intoxicated officer alone.	2-Day Vac. Loss
2020	Chris Muller	925795	M	Sergeant	Pointed BWC at ceiling to avoid recording; falsely reported fitness to DA.	2-Day Vac. Loss

Year	Name	Tax No.	M/F	Role	Misconduct (Dec 8, 2019 Fatal MVA)	Penalty
2020	Robert J. Dantone	946895	M	Captain	Duty Captain; failed to suppress misconduct or discipline failures.	None
2020	Peter Woodburn	947617	M	Responder	First on scene; failed to record statements or activate BWC.	Instruction
2020	Robert Grella	952810	M	Responder	Failure to activate BWC during a crime with a fatality.	Instruction
2020	Mayer Schwartz	961262	M	Responder	Failure to activate BWC; failed to record evidence of intoxication.	Instruction

**Table III: Post-Termination Master Comparator List – Pre-Trial<sup>5</sup>**

<sup>5</sup> The data contained in Table III is a critical evidentiary anchor because it exposes a continuing practice lacking transparency and a failure of the 2021 Disciplinary Matrix to ensure objective, uniform standards.

Specifically, the retention of Kimberly Lucas [958844] for substantiated false statements and Wojciech Bagan [948637] for Criminal Contempt—contrasted against the 2026 felony indictments of Caligiuri [966975] and McLoughlin [975022]—illustrates an arbitrary threshold for prosecution that targets specific individuals while shielding others through 'unreviewable' dismissal probation.

This table chronicles recent disciplinary outcomes and criminal arrests from 2024 through 2026 to establish a pattern of disparate treatment in the modern "Matrix" era.

Year	Name	Tax #	M/F	Offense(s)	Penalty	Terminated?
2024	Kimberly Lucas	958844	F	<b>Fraudulent COVID Cards:</b> Intentionally provided false statements during official interview.	85-Day Vacation Loss; 1-Year Dismissal Probation.	No
2024	Delare Rathour	952149	M	Reckless Endangerment (2nd); Criminal Contempt; Reckless Driving; Violation of Order of Protection.	30-Day Suspension; 1-Year Dismissal Probation.	No
2025	Wojciech Bagan	948637	M	<b>Criminal Contempt (2nd Degree):</b> Intentional disobedience of a Family Court Order of Protection.	Forfeit 30 suspension days; Counseling	No
2026	Michael A. Caligiuri	966975	M	<b>Felony Tampering;</b> Falsifying Records; Official Misconduct	Indicted	[Pending]

Year	Name	Tax #	M/F	Offense(s)	Penalty	Terminated?
				related to evidence tampering.		
2026	Ryan P. McLoughlin	975022	M	<b>Felony Tampering;</b> Falsifying Records; Official Misconduct related to BWC	Indicted	[Pending]
2026	Caiden R. Martinez	968611	M	<b>Arrested:</b> Criminal Contempt (2nd Degree); Alleged possession of a "ghost gun".	Suspended Feb. 10; \$60K Cash Bail.	[Pending]
2026	Richard S. Taylor <sup>6</sup>	939561	M	<b>Alleged time-theft:</b>	Reportedly resolved by	No

<sup>6</sup> Upon information and belief, public reporting concerning Deputy Chief Richard S. Taylor materially understates the potential comparator significance of the matter if the Department limited its public characterization to approximately 172 paid hours allegedly not worked, repayment of approximately \$20,000, forfeiture of accrued time, docked pay, transfer, and dismissal probation.

Plaintiff alleges that discovery is necessary to determine the full scope of the alleged misconduct, including the number of tours reviewed, the relevant lookback period, whether Taylor allegedly assigned himself to commands or duties where he performed no meaningful work, whether City vehicles, Department equipment, overtime, benefits, or other public resources were implicated, who approved or certified the underlying time records, whether any supervisor or executive reviewed the alleged misconduct before resolution, whether the matter was referred for criminal prosecution, and whether the Department treated Taylor more favorably than lower-ranking or disfavored members accused of comparable or less serious misconduct.

Plaintiff further alleges that the Taylor matter is material comparator evidence because, as publicly reported, an NYPD executive accused of payroll/time-theft misconduct involving repeated

Year	Name	Tax #	M/F	Offense(s)	Penalty	Terminated?
				and payroll misconduct, 172 paid hours not worked during 2024–2025	plea agreement, transferred ; required to repay \$20,000; docked days' pay; placed on dismissal probation.	
2026	David Tzall		M	<b>Alleged time-theft:</b> Alleged to have been working at his private practice as a psychologist instead of the NYPD Health and Wellness Division; approximately 800 hours	No	No, allegedly resigned
2026	Matthew J. Graziano		M	<b>Alleged time-theft:</b> Alleged to have been working at his private practice as a psychologist instead of the NYPD Health and	No	No, allegedly resigned

incidents over a multi-year period was reportedly retained through a negotiated disciplinary resolution, while plaintiff AMRIT P. SINGH was terminated after dismissal, sealing, recantation, and disputed accusation evidence.

Year	Name	Tax #	M/F	Offense(s)	Penalty	Terminated?
				Wellness Division; approximately 1000 hours		

**THE DEPARTMENT TRIAL and TERMINATION DECISION**

**A. The Department Charges**

190. The NYPD disciplinary matter against plaintiff AMRIT P. SINGH proceeded under Case No. C-031536.

191. The written Charges and Specifications were dated September 27, 2023, and were most recently amended on or about March 9, 2026.

192. Plaintiff AMRIT P. SINGH pleaded not guilty to the charged misconduct.

193. The disciplinary charges arose from the same domestic-related accusation history described above, including alleged events involving plaintiff AMRIT P. SINGH, Satvinder Kaur, and certain family members.

194. The Department’s amended charges included allegations concerning alleged display of a firearm, alleged failure to safeguard a firearm, alleged physical altercations, alleged injury, alleged endangering the welfare of a child, alleged menacing, alleged assault, and alleged failure to notify the Operations Unit after off-duty incidents.

195. The Department did not prosecute plaintiff AMRIT P. SINGH based upon a criminal conviction.

196. The related criminal matter had been dismissed by the Queens Criminal Court on January 30, 2024, on speedy-trial grounds pursuant to CPL § 170.30(1)(e), and sealed pursuant to CPL § 160.50.

197. Plaintiff AMRIT P. SINGH alleges that, notwithstanding the dismissal and sealing of the criminal matter, defendants continued to treat the same accusation materials as operative disciplinary proof.

198. Plaintiff AMRIT P. SINGH alleges that the Department's disciplinary prosecution relied upon pretrial accusation materials, including domestic-incident materials, 911-related materials, recorded interviews, prior witness statements, and related evidence generated from the domestic-related accusation record.

#### **B. The Recantation Evidence and Credibility Determinations**

199. Plaintiff AMRIT P. SINGH alleges that recantation evidence presents a serious legal and evidentiary issue in domestic-violence-related proceedings.

200. Plaintiff AMRIT P. SINGH does not allege that a recantation automatically controls, that an initial accusation must be disregarded merely because a witness later retreats from it, or that a disciplinary tribunal is categorically prohibited from evaluating whether an earlier statement may be more reliable than later testimony.

201. Plaintiff AMRIT P. SINGH alleges that administrative factfinders may, in appropriate circumstances, make credibility determinations, consider prior inconsistent statements, and evaluate recantation evidence in light of the totality of the record.

202. Plaintiff AMRIT P. SINGH further alleges, however, that the authority to make credibility determinations is not unlimited and does not permit defendants to ignore the legal consequences of dismissal and sealing, convert recanted accusation materials into established

misconduct, or impose termination through an evidentiary pathway that New York law does not permit.

203. Plaintiff AMRIT P. SINGH alleges that this case presented more than an ordinary conflict between an original accusation and a later recantation.

204. Plaintiff AMRIT P. SINGH alleges that the disciplinary record reflected material recantation evidence from Satvinder Kaur, the principal complainant, and from other family witnesses whose original statements were used to support the Department's accusation narrative.

205. Plaintiff AMRIT P. SINGH alleges that Satvinder Kaur recanted or materially retreated from prior allegations against him during the Department trial.

206. Plaintiff AMRIT P. SINGH alleges that other family witnesses also recanted, contradicted, or materially retreated from prior statements concerning the alleged domestic-related events.

207. Plaintiff AMRIT P. SINGH alleges that these recantations were not minor inconsistencies, peripheral corrections, or immaterial changes in detail.

208. Plaintiff AMRIT P. SINGH alleges that the recantations went to the core accusation narrative used by defendants to justify disciplinary findings and termination.

209. Plaintiff AMRIT P. SINGH alleges that the recantation evidence required defendants to exercise caution, demand corroboration, evaluate reliability, consider motive, assess consistency, and distinguish lawful proof from dismissed, sealed, recanted, or seal-derived accusation materials.

210. Plaintiff AMRIT P. SINGH alleges that defendants instead treated the recantation evidence as an obstacle to overcome through institutional preference for the original accusation narrative.

211. Plaintiff AMRIT P. SINGH alleges that defendants gave dispositive or substantial weight to prior accusation materials, including 911-related materials, domestic-incident records, recorded interviews, prior out-of-court statements, and related accusation evidence generated during or after the criminal-investigative process.

212. Plaintiff AMRIT P. SINGH alleges that defendants elevated those prior accusation materials over sworn trial testimony, recanting witnesses, plaintiff's defensive account, the absence of a criminal conviction, and the legal consequences of dismissal and sealing.

213. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY prosecuted the disciplinary matter by relying upon prior accusation materials notwithstanding the dismissal and sealing of the related criminal case and notwithstanding material recantation evidence.

214. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER credited prior accusation materials over recanting witnesses and plaintiff's defensive account.

215. Plaintiff AMRIT P. SINGH alleges that defendant ADLER'S treatment of the recantation evidence gave operative disciplinary effect to dismissed, sealed, recanted, or seal-derived accusation materials.

216. Plaintiff AMRIT P. SINGH alleges that defendant JESSICA S. TISCH adopted, ratified, approved, and executed the termination recommendation despite the recantation evidence, the dismissal and sealing of the related criminal matter, and the absence of a criminal conviction.

217. Plaintiff AMRIT P. SINGH alleges that defendants' handling of the recantation evidence was not a neutral credibility determination within a lawful disciplinary framework, but

part of an unlawful employment process that treated the original domestic-violence accusation narrative as presumptively true.

218. Plaintiff AMRIT P. SINGH alleges that defendants' treatment of the recantation evidence reflected gender-based domestic-violence stereotyping because defendants treated him, a male police officer involved in a domestic-related family dispute, as the presumptive aggressor.

219. Plaintiff AMRIT P. SINGH alleges that defendants discounted his defensive account, his actual or perceived status as a victim of domestic violence or defensive actor, and the possibility that the original accusation narrative was incomplete, exaggerated, unreliable, or false.

220. Plaintiff AMRIT P. SINGH alleges that defendants' credibility determinations were further infected by unlawful reliance on arrest-related and prosecution-related information that had been dismissed and sealed under CPL § 160.50.

221. Plaintiff AMRIT P. SINGH alleges that the issue is not whether a disciplinary tribunal may ever reject a recantation.

222. Plaintiff AMRIT P. SINGH alleges that the issue is whether defendants may use recanted, dismissed, sealed, or seal-derived accusation materials as the functional substitute for reliable, independent, and legally permissible proof, and then impose the maximum employment penalty of termination.

223. Plaintiff AMRIT P. SINGH alleges that defendants' reliance on the original accusation narrative despite material recantation evidence was especially improper because the Department possessed or controlled comparator information showing how other members of service accused of serious misconduct, including criminal or potentially criminal conduct, were treated.

224. Plaintiff AMRIT P. SINGH alleges that defendants' decision to credit prior accusation materials over recanting witnesses must be evaluated against the full disciplinary context, including the Department's use of sealed materials, gendered domestic-violence assumptions, comparator disparity, and the severity of the penalty imposed.

225. Plaintiff AMRIT P. SINGH alleges that defendants' handling of the recantation evidence caused dismissed, sealed, and disputed domestic-related accusation materials to operate as career-ending employment evidence.

### **C. The Recommendation and Adoption of Termination**

226. Following the Department trial, defendant JEFF S. ADLER issued a Report and Recommendation concerning plaintiff AMRIT P. SINGH.

227. Defendant ADLER recommended that plaintiff AMRIT P. SINGH be found guilty of certain specifications and recommended the penalty of termination.

228. Defendant ADLER found plaintiff AMRIT P. SINGH not guilty of the assault specification identified as Specification 8.

229. Plaintiff AMRIT P. SINGH alleges that the not-guilty finding on Specification 8 is material because it demonstrates that the Department's proof did not establish every charged criminal-law theory even within the Department's own disciplinary framework.

230. Plaintiff AMRIT P. SINGH alleges that, notwithstanding the evidentiary defects, the dismissal and sealing of the criminal matter, the recantation evidence, and the absence of a criminal conviction, defendant ADLER recommended termination.

231. Defendant JESSICA S. TISCH, as Police Commissioner and final disciplinary authority, adopted, approved, ratified, and executed the termination recommendation.

232. Defendant TISCH dismissed plaintiff AMRIT P. SINGH from the Police Department City of New York pursuant to Administrative Code § 14-115.

233. Plaintiff AMRIT P. SINGH alleges that defendant TISCH'S final dismissal decision converted dismissed, sealed, recanted, and disputed accusation materials into a career-ending employment action.

234. Plaintiff AMRIT P. SINGH alleges that defendant TISCH adopted the termination recommendation with access to, or responsibility for, the Department's disciplinary system, disciplinary data, penalty practices, prior resolutions, negotiated settlements, trial decisions, deviation determinations, and comparator outcomes.

235. Plaintiff AMRIT P. SINGH alleges that defendant TISCH either knew or should have known that the Department had retained members of service accused of serious misconduct, including criminal or potentially criminal conduct, while imposing termination upon plaintiff after dismissal, sealing, recantation, and reliance upon prior accusation materials.

236. Plaintiff AMRIT P. SINGH alleges that the termination decision was not imposed in an evidentiary vacuum. It was made within a department disciplinary system that possessed a broad internal body of comparator information, including negotiated settlements, penalty recommendations, mitigation outcomes, final Police Commissioner decisions, and employment-retention outcomes that were not equally or meaningfully available to plaintiff.

237. Plaintiff AMRIT P. SINGH alleges that defendant TISCH'S adoption of termination therefore must be evaluated not merely against defendant ADLER'S Report and Recommendation, but against the Department's entire disciplinary practice, including the Department's treatment of members of service accused of serious misconduct who were permitted to remain employed.

**D. The Department's Exclusive Access to Disciplinary Data and Comparator Outcomes**

238. Plaintiff AMRIT P. SINGH alleges that, when defendants prosecuted, adjudicated, recommended, adopted, and enforced termination, the Department possessed or controlled the disciplinary data necessary to compare plaintiff's case against other NYPD matters involving serious misconduct.

239. That disciplinary data included charges and specifications, plea agreements, negotiated settlements, penalty recommendations, mitigation outcomes, trial decisions, deviation determinations, final Police Commissioner decisions, disciplinary histories, and employment-retention outcomes.

240. Plaintiff AMRIT P. SINGH alleges that this information was material to any fair assessment of whether termination was proportionate, consistent, equitable, or selectively imposed.

241. Plaintiff AMRIT P. SINGH alleges that the Department's comparator data is especially material because public reporting and publicly available disciplinary materials show that members of service accused of serious misconduct, including criminal or potentially criminal conduct, have remained employed after receiving negotiated resolutions, dismissal probation, penalty days, transfers, or other lesser outcomes.

242. Plaintiff AMRIT P. SINGH alleges that defendant TISCH's adoption of termination must be evaluated against the Department's entire disciplinary practice, including the Department's treatment of members accused of serious misconduct who were not terminated.

243. Plaintiff AMRIT P. SINGH alleges that defendants' access to the Department's disciplinary data, combined with plaintiff's lack of equal access to the same comparator universe, supports plaintiff's claims that the termination decision was arbitrary, selectively

imposed, discriminatory, retaliatory, and infected by unlawful reliance on sealed accusation materials.

244. Plaintiff AMRIT P. SINGH alleges that discovery is necessary to identify the complete universe of comparator matters, including members of service accused of criminal conduct, domestic incidents, firearm-related misconduct, payroll or time-theft misconduct, false statements, force-related misconduct, abuse of authority, and other serious misconduct who remained employed.

### **THE RESULTING EMPLOYMENT HARM**

245. Plaintiff AMRIT P. SINGH alleges that defendants' disciplinary prosecution, adjudicatory recommendation, and final adoption of termination caused him to lose his employment with the New York City Police Department.

246. Plaintiff AMRIT P. SINGH alleges that his termination caused the loss of salary, benefits, seniority, pension-related benefits, promotional opportunities, and continued law-enforcement employment.

247. Plaintiff AMRIT P. SINGH alleges that the termination decision caused reputational harm because defendants gave continuing employment effect to dismissed, sealed, recanted, disputed, and domestic-related accusation materials.

248. Plaintiff AMRIT P. SINGH alleges that the termination decision impaired his future law-enforcement, security-related, government, and private-sector employment opportunities.

249. Plaintiff AMRIT P. SINGH alleges that defendants' conduct caused emotional distress, humiliation, embarrassment, anxiety, loss of professional identity, economic loss, and continuing injury to his career and reputation.

250. Plaintiff AMRIT P. SINGH alleges that the disciplinary findings, dismissal record, and related accusation materials remain capable of affecting future employment, credentialing, licensing, background investigations, professional opportunities, and reputational standing.

251. Plaintiff AMRIT P. SINGH alleges that defendants' conduct converted a dismissed and sealed criminal matter, recanted domestic-related allegations, and disputed accusation materials into a continuing employment disability.

252. Plaintiff AMRIT P. SINGH alleges that defendants' conduct caused legally cognizable harm under the New York State Human Rights Law and, where applicable, the New York City Human Rights Law.

253. Plaintiff AMRIT P. SINGH alleges that he is entitled to compensatory damages, equitable relief, declaratory relief, injunctive relief, reinstatement or front pay where appropriate, restoration of lost wages and benefits, expungement or correction of unlawful records, attorneys' fees, costs, and all other relief permitted by law.

**VIOLATIONS AND CLAIMS ALLEGED**

**COUNT I  
ARREST HISTORY DISCRIMINATION  
IN VIOLATION OF  
NYS EXECUTIVE LAW § 296(16)  
(Against All Defendants)**

254. Plaintiff AMRIT P. SINGH repeats and realleges each and every allegation set forth above as though fully set forth herein.

255. Plaintiff brings this claim against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY for arrest-history

discrimination in violation of the New York State Human Rights Law, N.Y. Exec. Law § 296(16).

256. N.Y. Exec. Law § 296(16) prohibits, except where specifically required or permitted by statute, adverse employment action, inquiry, reliance, disclosure, or discriminatory treatment based upon an arrest or criminal accusation that was terminated in favor of the accused and sealed under New York law.

257. Plaintiff AMRIT P. SINGH was arrested on September 12, 2023, and arraigned on September 12, 2023, in Queens Criminal Court.

258. The criminal matter included charges of Penal Law § 260.10(1), Acting in a Manner Injurious to a Child Less Than Seventeen; Penal Law § 120.14(1), Menacing in the Second Degree with a Weapon; Penal Law § 120.00(1), Assault in the Third Degree with Intent to Cause Physical Injury; and Penal Law § 240.26(1), Harassment in the Second Degree by Physical Contact.

259. On January 30, 2024, the Queens Criminal Court dismissed all listed charges on speedy-trial grounds pursuant to CPL § 170.30(1)(e), and the matter was sealed pursuant to CPL § 160.50.

260. Plaintiff alleges that, upon dismissal and sealing, defendants were prohibited from treating the arrest, prosecution, and related accusation materials as continuing evidence of misconduct, unfitness, poor judgment, lack of temperament, or grounds for adverse employment action absent statutory authorization or court order.

261. Plaintiff alleges that defendants nevertheless used, relied upon, maintained, presented, adopted, ratified, or gave adverse employment effect to plaintiff's dismissed and sealed arrest-related accusation materials during the NYPD disciplinary process.

262. Plaintiff alleges that defendant CHRISTINE M. MALONEY prosecuted the disciplinary matter by relying upon accusation materials arising from the dismissed and sealed criminal matter, including domestic-incident materials, 911-related materials, recorded interviews, prior witness statements, and related arrest or prosecution-derived information.

263. Plaintiff alleges that defendant JEFF S. ADLER credited, adopted, and gave operative disciplinary effect to dismissed, sealed, recanted, or seal-derived accusation materials in making findings and recommending termination.

264. Plaintiff alleges that defendant JESSICA S. TISCH adopted, ratified, approved, and executed plaintiff's termination based upon a disciplinary record that gave continuing adverse employment effect to plaintiff's dismissed and sealed arrest history and related non-conviction accusation materials.

265. Plaintiff alleges that defendant THE CITY OF NEW YORK, through the NYPD and its agents, employees, attorneys, adjudicators, policymakers, and final disciplinary decision-makers, caused, permitted, maintained, ratified, or failed to correct the unlawful use of plaintiff's dismissed and sealed arrest history in the disciplinary process.

266. Plaintiff alleges that defendants' conduct converted a criminal matter terminated in plaintiff's favor and sealed under CPL § 160.50 into a continuing employment disability.

267. Plaintiff alleges that defendants' reliance upon his dismissed and sealed arrest history was not narrowly confined to any lawful use permitted by statute and instead treated protected non-conviction information as substantive proof of misconduct, unfitness, lack of judgment, and grounds for termination.

268. Plaintiff alleges that defendants' arrest-history discrimination caused him to suffer termination from NYPD employment, loss of salary and benefits, loss of seniority and pension-

related benefits, reputational harm, emotional distress, economic loss, impairment of future law-enforcement and security-related opportunities, and other damages recoverable by law.

269. Plaintiff alleges that the individual defendants directly participated in, aided, abetted, compelled, permitted, ratified, or failed to correct the discriminatory practices alleged herein, in violation of N.Y. Exec. Law § 296(6).

270. Plaintiff alleges that defendants' conduct was intentional, willful, reckless, and/or undertaken with deliberate indifference to plaintiff's rights under the New York State Human Rights Law.

271. By reason of defendants' unlawful conduct, plaintiff AMRIT P. SINGH is entitled to all available legal, equitable, declaratory, injunctive, and statutory relief, including compensatory damages, emotional-distress damages, economic damages, punitive damages against the individual defendants where legally available, pre-judgment and post-judgment interest, attorneys' fees, costs, and such other and further relief as this Court deems just and proper.

**COUNT II  
GENDER DISCRIMINATION  
IN VIOLATION OF  
NYS EXECUTIVE LAW § 296(1)  
(Against All Defendants)**

272. Plaintiff AMRIT P. SINGH repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

273. New York State Executive Law § 296(1) makes it an unlawful discriminatory practice for an employer to discharge, refuse to hire, or otherwise discriminate against an individual in compensation or in the terms, conditions, or privileges of employment because of the individual's sex or gender.

274. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff AMRIT P. SINGH'S employer within the meaning of the New York State Human Rights Law.

275. Plaintiff AMRIT P. SINGH alleges that defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY acted as agents, officials, attorneys, adjudicatory officers, policymakers, final decision-makers, and/or direct participants in the NYPD disciplinary and termination actions challenged herein.

276. Plaintiff AMRIT P. SINGH alleges that defendants discriminated against him because he is male by treating him as the presumptive aggressor in the domestic-related accusation history, discounting his defensive account, and refusing to meaningfully credit his actual or perceived status as a victim of domestic violence or defensive actor.

277. Plaintiff AMRIT P. SINGH alleges that defendants applied or participated in a gender-based disciplinary presumption under which male officers accused in domestic-violence-related matters are treated as presumptive aggressors, while their claims of defensive conduct, victimization, reciprocal violence, fabrication, exaggeration, or unreliability are discounted, minimized, or treated as non-credible.

278. Plaintiff AMRIT P. SINGH alleges that this gender-based presumption infected the disciplinary prosecution, evidentiary presentation, credibility determinations, penalty recommendation, penalty adoption, and final termination decision.

279. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY participated in the discriminatory process by prosecuting the disciplinary matter through a domestic-violence accusation narrative that treated plaintiff as the presumptive male aggressor and relied upon prior accusation materials despite dismissal, sealing, recantation, and plaintiff's defensive account.

280. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER participated in the discriminatory process by crediting prior accusation materials over recanting witnesses and plaintiff's defensive account, thereby giving operative disciplinary effect to a gendered domestic-violence narrative that treated plaintiff's male status as functionally consistent with aggression rather than requiring neutral evaluation.

281. Plaintiff AMRIT P. SINGH alleges that defendant JESSICA S. TISCH adopted, approved, ratified, and executed the termination recommendation based upon a disciplinary record infected by gender-based domestic-violence stereotypes, dismissed and sealed accusation materials, recantation evidence, and unequal penalty treatment.

282. Plaintiff AMRIT P. SINGH alleges that comparator evidence will show that similarly situated or more culpable members of service, including female officers and favored officers accused of serious misconduct, criminal or potentially criminal conduct, domestic incidents, firearm-related misconduct, dishonesty, payroll or time-theft misconduct, abuse of authority, or other serious misconduct, received more favorable treatment, mitigation, negotiated resolutions, retention, or less severe penalties.

283. Plaintiff AMRIT P. SINGH alleges that defendants' gender discrimination altered the terms, conditions, and privileges of his employment and caused him to suffer termination, loss of income and benefits, loss of seniority and pension-related benefits, reputational harm, emotional distress, impairment of future law-enforcement and security-related opportunities, and continuing professional injury.

284. Plaintiff AMRIT P. SINGH alleges that defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY directly participated in, aided, abetted, compelled,

permitted, ratified, or failed to correct the discriminatory practices alleged herein, in violation of N.Y. Exec. Law § 296(6).

285. By reason of the foregoing, defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY violated N.Y. Exec. Law § 296(1), and plaintiff AMRIT P. SINGH is entitled to all available legal, equitable, declaratory, injunctive, and statutory relief.

**COUNT III  
RETALIATION  
IN VIOLATION OF  
NYS EXECUTIVE LAW § 296(7)  
(Against All Defendants)**

286. Plaintiff AMRIT P. SINGH repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

287. N.Y. Exec. Law § 296(7) makes it an unlawful discriminatory practice to retaliate or discriminate against any person because he opposed practices forbidden under the New York State Human Rights Law, filed a complaint, testified, assisted, or participated in any manner in a proceeding under the statute.

288. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff AMRIT P. SINGH'S employer within the meaning of the New York State Human Rights Law.

289. Plaintiff AMRIT P. SINGH alleges that defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY acted as agents, officials, attorneys, adjudicatory officers, policymakers, final decision-makers, and/or direct participants in the NYPD disciplinary and termination actions challenged herein.

290. Plaintiff AMRIT P. SINGH engaged in protected activity by opposing defendants' reliance upon dismissed and sealed criminal accusation materials, contesting the

domestic-violence accusation narrative, asserting his defensive account, challenging the use of recanted and unreliable accusation evidence, and raising legal and factual defenses to discriminatory and unlawful disciplinary practices.

291. Plaintiff AMRIT P. SINGH further engaged in protected activity by opposing conduct he reasonably believed violated the New York State Human Rights Law, including arrest-history discrimination, gender discrimination, discrimination based upon actual or perceived status as a victim of domestic violence, and related adverse employment practices.

292. Plaintiff AMRIT P. SINGH alleges that defendants knew or should have known that he opposed the discriminatory and unlawful practices alleged herein because his defenses, testimony, litigation position, and objections placed defendants on notice that he contested the Department's reliance upon dismissed, sealed, recanted, and gendered domestic-violence accusation materials.

293. Plaintiff AMRIT P. SINGH alleges that defendants retaliated against him by continuing the disciplinary prosecution, crediting prior accusation materials over recanting witnesses, rejecting or minimizing his defensive account, recommending termination, adopting termination, and dismissing him from the Police Department City of New York.

294. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY participated in the retaliatory conduct by prosecuting the disciplinary matter through reliance upon accusation materials that plaintiff challenged as dismissed, sealed, recanted, unreliable, discriminatory, and legally improper.

295. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER participated in the retaliatory conduct by crediting the challenged accusation materials over plaintiff's

defensive account and recanting witnesses, recommending termination, and giving operative disciplinary effect to the narrative plaintiff opposed.

296. Plaintiff AMRIT P. SINGH alleges that defendant JESSICA S. TISCH participated in the retaliatory conduct by adopting, approving, ratifying, and executing the termination recommendation despite plaintiff's protected opposition to defendants' use of dismissed, sealed, recanted, discriminatory, and unreliable accusation materials.

297. Plaintiff AMRIT P. SINGH alleges that defendants' stated reasons for termination were pretextual, selectively applied, or materially incomplete because defendants imposed the harshest employment penalty after plaintiff opposed unlawful practices, while the Department retained members of service accused of serious misconduct, including criminal or potentially criminal conduct.

298. Plaintiff AMRIT P. SINGH alleges that defendants' retaliatory conduct altered the terms, conditions, and privileges of his employment and caused him to suffer termination, loss of income and benefits, loss of seniority and pension-related benefits, reputational harm, emotional distress, impairment of future law-enforcement and security-related opportunities, and continuing professional injury.

299. Plaintiff AMRIT P. SINGH alleges that defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY directly participated in, aided, abetted, compelled, permitted, ratified, or failed to correct the retaliatory practices alleged herein, in violation of N.Y. Exec. Law § 296(6).

300. By reason of the foregoing, defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY violated N.Y. Exec. Law § 296(7),

and plaintiff AMRIT P. SINGH is entitled to all available legal, equitable, declaratory, injunctive, and statutory relief.

**COUNT IV  
ARREST HISTORY DISCRIMINATION  
IN VIOLATION OF  
NYC ADMIN. CODE § 8-107  
(Against All Defendants)**

301. Plaintiff AMRIT P. SINGH repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

302. The New York City Human Rights Law prohibits discrimination in employment and related employment practices based upon protected arrest-history information and must be construed independently and liberally to accomplish its broad remedial purposes.

303. N.Y.C. Admin. Code § 8-107(11)(a) incorporates protections against adverse treatment based upon arrests and criminal accusations that were terminated in favor of the accused and sealed under New York law.

304. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff AMRIT P. SINGH'S employer through the New York City Police Department.

305. At all relevant times, defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY acted as agents, officials, attorneys, adjudicatory officers, policymakers, final decision-makers, and/or direct participants in the NYPD disciplinary and termination actions challenged herein.

306. Plaintiff AMRIT P. SINGH was arrested on September 12, 2023, and arraigned on September 12, 2023, in Queens Criminal Court.

307. The criminal matter included charges of Penal Law § 260.10(1), Acting in a Manner Injurious to a Child Less Than Seventeen; Penal Law § 120.14(1), Menacing in the

Second Degree with a Weapon; Penal Law § 120.00(1), Assault in the Third Degree with Intent to Cause Physical Injury; and Penal Law § 240.26(1), Harassment in the Second Degree by Physical Contact.

308. On January 30, 2024, the Queens Criminal Court dismissed all listed charges on speedy-trial grounds pursuant to CPL § 170.30(1)(e), and the matter was sealed pursuant to CPL § 160.50.

309. Plaintiff alleges that, despite the dismissal and sealing of the criminal matter, defendants treated the arrest, domestic-related accusation materials, prior out-of-court statements, recorded interviews, 911-related materials, and related non-conviction information as continuing evidence of misconduct, unfitness, poor judgment, lack of temperament, and professional disqualification.

310. Plaintiff alleges that defendants used, relied upon, maintained, presented, adopted, ratified, or gave adverse employment effect to plaintiff's dismissed and sealed arrest history and related non-conviction information in connection with the NYPD disciplinary prosecution, evidentiary presentation, findings, penalty recommendation, final termination decision, and resulting employment consequences.

311. Plaintiff alleges that defendant CHRISTINE M. MALONEY participated in the discriminatory process by prosecuting the disciplinary matter in a manner that relied upon the dismissed and sealed arrest-related accusation materials and disregarded the legal consequences of dismissal and sealing.

312. Plaintiff alleges that defendant JEFF S. ADLER participated in the discriminatory process by crediting, adopting, and giving operative disciplinary effect to dismissed, sealed,

recanted, or seal-derived accusation materials as the basis for findings and termination recommendation.

313. Plaintiff alleges that defendant JESSICA S. TISCH participated in the discriminatory process by adopting, approving, ratifying, and executing plaintiff's termination based upon a disciplinary record that treated the dismissed and sealed arrest-related accusation materials as established misconduct.

314. Plaintiff alleges that these acts were employment-related adverse actions flowing from defendants continued use of plaintiff's dismissed and sealed arrest history and related non-conviction information.

315. Plaintiff alleges that defendants treated plaintiff less well and imposed materially adverse employment consequences upon him because of protected arrest-history information.

316. Plaintiff alleges that *Holloway v. City of New York*, 2024 NY Slip Op 50812(U) (Sup. Ct., N.Y. County June 27, 2024), supports this claim because the court denied dismissal of NYSHRL and NYCHRL arrest-history discrimination claims where an NYPD officer alleged that the City used dismissed and sealed criminal charges to terminate his employment, rejected dismissal based on the City's "underlying conduct" argument at the pleading stage, and declined to require Article 78 treatment where the plaintiff pursued a plenary discrimination action.

317. Plaintiff alleges that the same reasoning applies here because defendants-imposed employment consequences after plaintiff's criminal matter had been dismissed and sealed.

318. Plaintiff alleges that defendants' conduct violated and/or was undertaken in derogation of CPL §§ 160.50 and 160.60, which are designed to prevent continuing stigma and adverse consequences from a criminal matter terminated in favor of the accused and sealed under New York law.

319. Plaintiff alleges that defendants' conduct caused him to suffer loss of employment, loss of income and benefits, loss of seniority and pension-related benefits, impairment of future law-enforcement employment opportunities, impairment of security-related employment opportunities, reputational harm, emotional distress, economic loss, and continuing professional injury.

320. Plaintiff alleges that defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY directly participated in, aided, abetted, compelled, permitted, ratified, or failed to correct the discriminatory acts alleged herein, in violation of N.Y.C. Admin. Code § 8-107(6).

321. By reason of the foregoing, defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY violated the New York City Human Rights Law, and plaintiff AMRIT P. SINGH is entitled to all available legal, equitable, declaratory, injunctive, and statutory relief.

**COUNT V  
GENDER DISCRIMINATION & STATUS AS A VICTIM OF DOMESTIC VIOLENCE  
IN VIOLATION OF  
NYC ADMIN. CODE §§ 8-107 AND 8-107.1  
(Against All Defendants)**

322. Plaintiff AMRIT P. SINGH repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

323. The New York City Human Rights Law makes it an unlawful discriminatory practice for an employer, or an employee or agent thereof, to discriminate against an employee in the terms, conditions, or privileges of employment because of the employee's actual or perceived gender.

324. The New York City Human Rights Law also protects employees who are actual or perceived victims of domestic violence, sex offenses, or stalking, including by prohibiting adverse treatment based upon such protected status and requiring reasonable accommodation where applicable.

325. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff AMRIT P. SINGH'S employer through the New York City Police Department.

326. At all relevant times, defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY acted as agents, officials, attorneys, adjudicatory officers, policymakers, final decision-makers, and/or direct participants in the NYPD disciplinary and termination actions challenged herein.

327. Plaintiff AMRIT P. SINGH alleges that defendants discriminated against him because he is male by treating him as the presumptive aggressor in the domestic-related accusation history, refusing to meaningfully credit his defensive account, and refusing to meaningfully credit his actual or perceived status as a victim of domestic violence or defensive actor.

328. Plaintiff AMRIT P. SINGH alleges that defendants applied or participated in a gendered domestic-violence framework under which male officers involved in domestic-related disputes are treated as presumptive aggressors, while their claims of defensive conduct, victimization, reciprocal violence, fabrication, exaggeration, or unreliability are discounted, minimized, or treated as non-credible.

329. Plaintiff AMRIT P. SINGH alleges that this gender-based and domestic-violence-status discrimination infected the disciplinary prosecution, evidentiary assessment, credibility determinations, penalty recommendation, penalty adoption, and final termination decision.

330. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY participated in the discriminatory process by prosecuting the disciplinary matter through a domestic-violence accusation narrative that treated plaintiff as the presumptive male aggressor and discounted his defensive account, recantation evidence, and actual or perceived status as a victim of domestic violence or defensive actor.

331. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER participated in the discriminatory process by crediting prior accusation materials over recanting witnesses and plaintiff's defensive account, thereby giving operative disciplinary effect to a gendered domestic-violence narrative that rejected or minimized plaintiff's actual or perceived status as a victim of domestic violence or defensive actor.

332. Plaintiff AMRIT P. SINGH alleges that defendant JESSICA S. TISCH adopted, approved, ratified, and executed the termination recommendation based upon a disciplinary record infected by gender-based domestic-violence stereotypes, dismissal and sealing, recantation evidence, and unequal penalty treatment.

333. Plaintiff AMRIT P. SINGH alleges that comparator evidence will show that similarly situated or more culpable members of service, including female officers and favored officers accused of serious misconduct, received more favorable treatment, mitigation, negotiated resolutions, retention, or less severe penalties.

334. Plaintiff AMRIT P. SINGH alleges that defendants treated him less well because of his gender and actual or perceived status as a victim of domestic violence.

335. Plaintiff AMRIT P. SINGH alleges that defendants' discriminatory conduct altered the terms, conditions, and privileges of his employment and caused termination, loss of income and benefits, loss of seniority and pension-related benefits, impairment of future law-

enforcement and security-related employment opportunities, reputational harm, emotional distress, economic loss, and continuing professional injury.

336. Plaintiff AMRIT P. SINGH alleges that defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY directly participated in, aided, abetted, compelled, permitted, ratified, or failed to correct the discriminatory acts alleged herein, in violation of N.Y.C. Admin. Code § 8-107(6).

337. By reason of the foregoing, defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY violated the New York City Human Rights Law, including N.Y.C. Admin. Code §§ 8-107(1)(a), 8-107(6), 8-107(27), and 8-107.1, and plaintiff AMRIT P. SINGH is entitled to all available legal, equitable, declaratory, injunctive, and statutory relief.

**COUNT VI  
RETALIATION  
IN VIOLATION OF  
NYC ADMIN. CODE § 8-107(7)  
(Against All Defendants)**

338. Plaintiff AMRIT P. SINGH repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

339. N.Y.C. Admin. Code § 8-107(7) makes it an unlawful discriminatory practice for an employer, employee, agent, or other covered person to retaliate or discriminate against a person because that person opposed practices forbidden under the New York City Human Rights Law, filed or threatened to file a complaint, testified, assisted, participated in any manner in an investigation, proceeding, or hearing, or otherwise engaged in protected activity.

340. Plaintiff AMRIT P. SINGH engaged in protected activity by opposing arrest-history discrimination, gender discrimination, discrimination based upon actual or perceived

status as a victim of domestic violence, and defendants' use of dismissed and sealed criminal accusation materials as a basis for adverse employment action.

341. Plaintiff AMRIT P. SINGH further engaged in protected activity by asserting his defensive account, challenging the gendered presumption that he was the aggressor because he is male, contesting defendants' reliance upon recanted and unreliable accusation evidence, and opposing the use of his dismissed and sealed criminal matter as a continuing employment disability.

342. Plaintiff AMRIT P. SINGH alleges that defendants knew or should have known of his protected activity because his testimony, defenses, litigation position, objections, and opposition to the disciplinary narrative placed defendants on notice that he opposed discriminatory and unlawful employment practices.

343. Plaintiff AMRIT P. SINGH alleges that, after and because he engaged in protected activity, defendants subjected him to adverse employment actions, including continued disciplinary prosecution, adverse evidentiary treatment, rejection or minimization of his defensive account, reliance upon prior accusation materials, recommendation of termination, adoption of termination, and dismissal from the Police Department City of New York.

344. Plaintiff AMRIT P. SINGH alleges that defendant CHRISTINE M. MALONEY participated in the retaliatory conduct by prosecuting the disciplinary matter through reliance upon accusation materials that plaintiff challenged as dismissed, sealed, recanted, unreliable, discriminatory, and legally improper.

345. Plaintiff AMRIT P. SINGH alleges that defendant JEFF S. ADLER participated in the retaliatory conduct by crediting the challenged accusation materials over plaintiff's

defensive account and recanting witnesses, recommending termination, and giving operative disciplinary effect to the narrative plaintiff opposed.

346. Plaintiff AMRIT P. SINGH alleges that defendant JESSICA S. TISCH participated in the retaliatory conduct by adopting, approving, ratifying, and executing the termination recommendation despite plaintiff's protected opposition to defendants' use of dismissed, sealed, recanted, discriminatory, and unreliable accusation materials.

347. Plaintiff AMRIT P. SINGH alleges that defendant THE CITY OF NEW YORK is liable for the retaliatory acts, omissions, ratifications, and failures to correct committed by its policymakers, final decision-makers, supervisors, disciplinary officials, attorneys, adjudicatory officers, and agents.

348. Plaintiff AMRIT P. SINGH alleges that defendants' stated reasons for termination were pretextual, selectively applied, or materially incomplete because defendants imposed the harshest employment penalty after plaintiff opposed unlawful practices, while the Department retained members of service accused of serious misconduct, including criminal or potentially criminal conduct.

349. Plaintiff AMRIT P. SINGH alleges that defendants' retaliatory actions were reasonably likely to deter a person from opposing discrimination, asserting defensive or domestic-violence-victim status, challenging the use of dismissed and sealed arrest information, contesting gender-based domestic-violence stereotypes, or pursuing legal remedies.

350. Plaintiff AMRIT P. SINGH alleges that defendants' retaliation altered the terms, conditions, and privileges of his employment and caused termination, loss of income and benefits, loss of seniority and pension-related benefits, reputational harm, emotional distress,

impairment of future law-enforcement and security-related opportunities, and continuing professional injury.

351. Plaintiff AMRIT P. SINGH alleges that defendants JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY directly participated in, aided, abetted, compelled, permitted, ratified, or failed to correct the retaliatory practices alleged herein, in violation of N.Y.C. Admin. Code § 8-107(6).

352. By reason of the foregoing, defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY violated N.Y.C. Admin. Code § 8-107(7), and plaintiff AMRIT P. SINGH is entitled to all available legal, equitable, declaratory, injunctive, and statutory relief.

#### **JURY TRIAL**

353. Plaintiff AMRIT P. SINGH demands a trial by jury of all issues in this action that are so triable.

#### **PRAYER FOR RELIEF**

WHEREFORE, plaintiff AMRIT P. SINGH respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S. ADLER, and CHRISTINE M. MALONEY, jointly and severally where legally applicable, as follows:

- a. awarding plaintiff compensatory damages in an amount to be determined at trial;
- b. awarding plaintiff economic damages, including lost wages, lost benefits, lost seniority, lost pension-related value where legally recoverable, and other consequential economic damages;
- c. awarding plaintiff damages for emotional distress, reputational harm, loss of professional standing, and continuing dignitary injury;

- d. awarding punitive damages against the individual defendants to the fullest extent permitted by law;
- e. declaring that defendants violated plaintiff's rights under the New York State Human Rights Law and New York City Human Rights Law;
- f. enjoining defendants from unlawfully using, maintaining, disclosing, transmitting, or relying upon plaintiff's dismissed and sealed criminal matter, recanted domestic-related allegations, or seal-derived accusation materials as a basis for adverse employment action, except as expressly authorized by law;
- g. directing defendants, where legally authorized and appropriate, to reinstate plaintiff with restoration of salary, benefits, seniority, pension-related credits, and all other employment rights and privileges, or, alternatively, awarding front pay;
- h. directing defendants, where legally authorized and appropriate, to correct, withdraw, amend, seal, expunge, or cease reliance upon any record, report, communication, notation, disciplinary finding, database entry, or agency transmission that gives unlawful adverse employment effect to plaintiff's dismissed and sealed criminal matter or related accusation materials;
- i. awarding plaintiff pre-judgment and post-judgment interest;
- j. awarding plaintiff reasonable attorneys' fees, costs, and disbursements to the extent permitted by law; and
- k. awarding such other and further legal, equitable, declaratory, injunctive, and statutory relief as this Court deems just and proper.

Dated: May 23, 2026  
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders  
Attorney for Plaintiff AMRIT P. SINGH

**THE SANDERS FIRM, P.C.**  
30 Wall Street, 8<sup>th</sup> Floor  
New York, NY 10005  
(212) 652-2782 (Business Telephone)  
(212) 652-2783 (Facsimile)

Website: <http://www.thesandersfirmpc.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: May 23, 2026  
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders  
Attorney for Plaintiff AMRIT P. SINGH

**THE SANDERS FIRM, P.C.**  
30 Wall Street, 8<sup>th</sup> Floor  
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Website: <http://www.thesandersfirmpc.com>

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

INDEX NO.:

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AMRIT P. SINGH

Plaintiffs,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, JEFF S.  
ADLER, AND CHRISTINE M. MALONEY

Defendants'

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**SUMMONS WITH VERIFIED COMPLAINT**

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*Duly submitted by:*

By: s/Eric Sanders  
Attorney for Plaintiff AMRIT P. SINGH

**THE SANDERS FIRM, P.C.**  
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