

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

-----X
DINA L. SANFRATELLO

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK, JESSICA S. TISCH, TAMECCA
GREENE, and JAMES A. DAWES

Defendants
-----X

To the Defendant named above:

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

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

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

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

Plaintiff designates New York County as the place of trial.

The basis of venue is as follows: plaintiff resides in Suffolk County; the Transit District where certain acts and omissions occurred is located in Kings County; and NYPD Headquarters, the Office of the Police Commissioner, and the City-level offices, records, decision-making

authority, approvals, ratifications, and implementation mechanisms implicated in this action are located in New York County.

Although venue could potentially be placed in Suffolk County based upon plaintiff's residence, or in Kings County based upon events occurring at Transit District 32, plaintiff designates New York County as the place of trial because this action challenges NYPD employment decisions, supervisory actions, personnel determinations, probationary consequences, modification/demotion actions, records, approvals, ratifications, and continuing institutional conduct maintained, approved, implemented, or continued through NYPD Headquarters and City-level authority in New York County.

Dated: June 25, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DINA L. SANFRATELLO

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DEFENDANT ADDRESSES

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c/o New York City Law Department
Office of the Corporation Counsel
100 Church Street
New York, New York 10007

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

TAMECCA GREENE
c/o New York City Police Department
Transit Special Operations District
130 Livingston Avenue
Brooklyn, N.Y. 11201

JAMES A. DAWES
NYPD Transit District 32
960 Carroll Street
Brooklyn, N.Y. 11225

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THE CITY OF NEW YORK, JESSICA S. TISCH, TAMECCA
GREENE, and JAMES A. DAWES

Defendants
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Plaintiff DINA L. SANFRATELLO, by her attorney THE SANDERS FIRM, P.C.,
complaining of defendants THE CITY OF NEW YORK, JESSICA S. TISCH, TAMECCA
GREENE, and JAMES A. DAWES, alleges as follows:

INTRODUCTION

This is an action for race discrimination, gender discrimination, hostile work
environment, and retaliation under the New York State Human Rights Law and the New York
City Human Rights Law.

Plaintiff DINA L. SANFRATELLO is a white female NYPD employee who held the
rank of Lieutenant until April 27, 2026, when she was demoted. During the relevant period,
plaintiff was assigned to Transit District 32, where she served under TAMECCA GREENE, a
Black female who was then the Commanding Officer of Transit District 32 and is now a Deputy
Inspector assigned to Transit Bureau Special Operations District, and JAMES A. DAWES, a
Black male who served as the Executive Officer of Transit District 32.

GREENE was the principal actor. Beginning in or about October 2024, after plaintiff's
assignment to Transit District 32, GREENE repeatedly treated plaintiff less favorably than

similarly situated male and/or non-white supervisors. GREENE assigned plaintiff less favorable schedules, denied plaintiff stable and favorable regular days off, denied plaintiff the same tour flexibility afforded to comparable supervisors, denied leave under shifting “coverage” rationales, restricted overtime, restricted Department vehicle usage, imposed special rules directed at plaintiff, and subjected plaintiff to scrutiny, discipline, and adverse evaluations not imposed upon comparable supervisors.

The disparate treatment escalated after plaintiff objected to discriminatory targeting, complained through Department channels, and refused to conform to command practices she reasonably believed involved the downgrading or manipulation of crime classifications and related reporting practices. Those facts are pleaded as evidence of protected opposition, retaliatory motive, hostile work environment, and pretext, not as separate whistleblower causes of action.

DAWES knowingly participated in and continued GREENE’s course of conduct. As Executive Officer of Transit District 32, DAWES participated in discipline against plaintiff, enforced or continued restrictions imposed upon her, denied relief from retaliatory working conditions, and generated a negative evaluation that adopted GREENE’s adverse narrative despite limited direct observation of plaintiff and despite plaintiff’s transfer away from Transit District 32 before the end of the relevant rating period.

The CITY OF NEW YORK, through the NYPD, converted GREENE’s and DAWES’s discriminatory, hostile, and retaliatory conduct into formal employment consequences. Those consequences included negative evaluations, probationary extension, modification on or about April 21, 2026, demotion from the rank of Lieutenant on or about April 27, 2026, loss of

compensation, loss of overtime opportunities, formal Charges and Specifications, damage to plaintiff's personnel record, and continuing career harm.

On or about April 27, 2026, plaintiff was served with demotion paperwork at 375 Pearl Street. Upon information and belief, plaintiff was advised that the demotion order came from the Police Commissioner's Office. Defendant JESSICA S. TISCH is sued in her official capacity as Police Commissioner because plaintiff's modification, demotion, rank status, disciplinary records, personnel records, employment restrictions, and continuing institutional consequences were implemented, approved, ratified, maintained, continued, or remain subject to correction through NYPD headquarters-level and Commissioner-level authority.

On or about May 20, 2026, after plaintiff had already been modified and demoted, the NYPD preferred formal Charges and Specifications against plaintiff under CHIA 2026-1625 / IAB Log No. 2026-18017. Those charges arose from a June 8, 2025 Transit District 33 detail, the same detail for which plaintiff had requested relief from DAWES after special rules and restrictions had been imposed upon her.

Plaintiff alleges that the modification, demotion, formal Charges and Specifications, adverse evaluations, probationary consequences, command restrictions, and continuing employment harms were not isolated or neutral personnel actions. They were the culmination of a continuing course of race discrimination, gender discrimination, hostile work environment, and retaliation under the NYSHRL and NYCHRL.

Plaintiff brings this action to recover damages and obtain appropriate declaratory and equitable relief, including relief concerning her personnel records, disciplinary records, rank status, modification, demotion, formal Charges and Specifications, compensation, overtime opportunities, and continuing employment consequences.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to N.Y. Const. art. VI, § 7 and CPLR § 301 because this is a civil action seeking legal and equitable relief for violations of the New York State Human Rights Law and the New York City Human Rights Law.

2. This Court has personal 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 and conducts business within the State of New York, including within New York County.

3. This Court has personal jurisdiction over defendant JESSICA S. TISCH, in her official capacity as Police Commissioner of the City of New York, because she is the head of the New York City Police Department, maintains official authority within the State of New York, and is sued for official-capacity relief concerning NYPD employment actions, personnel records, rank status, disciplinary consequences, modification, demotion, and continuing employment harms.

4. This Court has personal jurisdiction over defendant TAMECCA GREENE because, during the relevant period, she was the Commanding Officer of Transit District 32, exercised supervisory and command authority over plaintiff within the State of New York, and personally participated in, directed, approved, ratified, or continued the discriminatory, hostile, and retaliatory conduct alleged herein.

5. This Court has personal jurisdiction over defendant JAMES A. DAWES because, during the relevant period, he was the Executive Officer of Transit District 32, exercised supervisory and command authority over plaintiff within the State of New York, and personally

participated in, enforced, adopted, ratified, or continued the discriminatory, hostile, and retaliatory conduct alleged herein.

6. Venue is proper in New York County pursuant to CPLR §§ 503 and 504. Plaintiff resides in Suffolk County, certain acts and omissions occurred at Transit District 32 in Kings County, and NYPD Headquarters, the Office of the Police Commissioner, and City-level offices, records, approvals, ratifications, disciplinary processes, personnel processes, probationary review mechanisms, and employment decision-making authority implicated in this action are located in New York County.

7. Although venue could potentially be placed in Suffolk County based upon plaintiff's residence, or in Kings County based upon events occurring at Transit District 32, plaintiff designates New York County as the place of trial because this action challenges NYPD employment decisions, personnel determinations, disciplinary charges, modification, demotion, records, approvals, ratifications, and continuing institutional consequences maintained, implemented, approved, ratified, or continued through NYPD Headquarters and City-level authority in New York County.

PROCEDURAL REQUIREMENTS

8. Plaintiff has satisfied all conditions precedent to commencing this action, or such conditions have otherwise been waived, excused, or are inapplicable.

9. Plaintiff brings this action directly in Supreme Court under the New York State Human Rights Law and the New York City Human Rights Law.

10. Plaintiff is not required to file a notice of claim as a condition precedent to asserting claims for discrimination, hostile work environment, and retaliation under the New York State Human Rights Law and the New York City Human Rights Law.

11. Plaintiff is not required to exhaust administrative remedies before filing this action in Supreme Court under the New York State Human Rights Law and the New York City Human Rights Law.

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

13. To the extent any defendant contends that any administrative, municipal, contractual, civil-service, disciplinary, or Department process applies to any portion of plaintiff's claims, such process does not bar plaintiff from pursuing independent statutory claims for race discrimination, gender discrimination, hostile work environment, and retaliation under the New York State Human Rights Law and the New York City Human Rights Law.

14. Plaintiff's claims are timely because the discriminatory, hostile, and retaliatory conduct alleged herein occurred within the applicable limitations periods and included continuing conduct, adverse personnel actions, disciplinary actions, modification, demotion, formal Charges and Specifications, and continuing employment consequences.

15. Plaintiff seeks legal and equitable relief available under the New York State Human Rights Law and the New York City Human Rights Law, including damages, attorneys' fees, costs, interest, declaratory relief, correction of personnel records, restoration of rank and benefits where appropriate, and such other and further relief as the Court deems just and proper.

PLAINTIFF

16. Plaintiff DINA L. SANFRATELLO is a white female and resident of Suffolk County, New York.

17. Plaintiff is employed by the New York City Police Department.

18. Plaintiff held the rank of Lieutenant until April 27, 2026, when she was demoted.

19. During the relevant period, plaintiff was assigned to Transit District 32, an NYPD Transit Bureau command located in Kings County, New York.

20. While assigned to Transit District 32, plaintiff performed supervisory duties as a Lieutenant, including supervising members of the service, overseeing field operations, reviewing reports, responding to incidents, and carrying out command assignments.

21. During her assignment to Transit District 32, plaintiff served under the command authority of defendant TAMECCA GREENE, who was then the Commanding Officer of Transit District 32.

22. Plaintiff also served under the executive and supervisory authority of defendant JAMES A. DAWES, who was the Executive Officer of Transit District 32.

23. Plaintiff was qualified for her position, performed her duties, and was entitled to equal terms, conditions, and privileges of employment without regard to race or gender.

24. Plaintiff opposed the discriminatory, hostile, and retaliatory treatment directed at her while assigned to Transit District 32.

25. Plaintiff also objected to command practices she reasonably believed were improper, including the alleged downgrading or manipulation of crime classifications and related reporting practices.

26. After plaintiff opposed discriminatory treatment, complained through Department channels, and objected to the alleged downgrading or manipulation of crime classifications, she was subjected to escalating adverse employment consequences, including restrictions on schedules, leave, overtime, Department vehicle usage, adverse evaluations, probationary consequences, modification, demotion, formal Charges and Specifications, loss of compensation, and continuing career harm.

DEFENDANTS

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

28. At all relevant times, defendant THE CITY OF NEW YORK operated, managed, controlled, supervised, and maintained the New York City Police Department.

29. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York State Human Rights Law and the New York City Human Rights Law.

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

31. Defendant TISCH is sued in her official capacity for prospective, declaratory, and equitable relief concerning the NYPD employment actions, personnel records, disciplinary consequences, modification, demotion, rank status, and continuing employment harms challenged in this action.

32. Defendant TAMECCA GREENE is a Black female who, during the relevant period, served as the Commanding Officer of Transit District 32.

33. Upon information and belief, defendant GREENE is now a Deputy Inspector assigned to Transit Bureau Special Operations District.

34. At all relevant times, defendant GREENE exercised command authority over plaintiff, including authority concerning plaintiff's assignments, schedules, regular days off, tour structure, leave requests, overtime access, Department vehicle usage, evaluation process, discipline, command treatment, and related terms and conditions of employment.

35. Defendant GREENE personally participated in, directed, approved, ratified, and/or continued the discriminatory, hostile, and retaliatory conduct alleged herein.

36. Defendant JAMES A. DAWES is a Black male who, during the relevant period, served as the Executive Officer of Transit District 32.

37. At all relevant times, defendant DAWES exercised executive and supervisory authority over plaintiff, including authority concerning discipline, command restrictions, evaluations, scheduling issues, Department vehicle usage, overtime-related issues, and related terms and conditions of employment.

38. Defendant DAWES personally participated in, enforced, adopted, approved, ratified, and/or continued the discriminatory, hostile, and retaliatory conduct alleged herein.

39. At all relevant times, defendants GREENE and DAWES acted under color of NYPD command authority and within the scope of their employment and/or agency relationship with defendant THE CITY OF NEW YORK.

40. At all relevant times, defendants GREENE and DAWES directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the discriminatory, hostile, and retaliatory practices alleged herein.

BACKGROUND

A. Assignment to Transit District 32 and Command Structure

41. In or about October 2024, plaintiff was assigned to Transit District 32.

42. At the time of her assignment to Transit District 32, plaintiff held the rank of Lieutenant.

43. Transit District 32 was an NYPD Transit Bureau command located in Kings County, New York.

44. Defendant GREENE was then the Commanding Officer of Transit District 32.

45. As Commanding Officer, GREENE exercised command authority over plaintiff's assignments, schedules, regular days off, tour structure, leave requests, overtime opportunities, Department vehicle usage, field-deployment expectations, evaluations, disciplinary referrals, command communications, and related terms and conditions of employment.

46. Defendant DAWES later served as the Executive Officer of Transit District 32.

47. As Executive Officer, DAWES exercised executive and supervisory authority over plaintiff and participated in discipline, restrictions, evaluations, and command decisions affecting plaintiff's employment.

48. GREENE and DAWES were not passive supervisors. They used NYPD command authority to impose, enforce, approve, ratify, or continue the employment actions challenged in this action.

49. After plaintiff arrived at Transit District 32, GREENE repeatedly changed plaintiff's assignment, tour structure, and regular days off in a manner not imposed upon similarly situated male and/or non-white supervisors.

50. Over approximately seven months, plaintiff was repeatedly chart-changed or assignment-changed while assigned to Transit District 32.

51. These repeated changes destabilized plaintiff's work schedule, deprived plaintiff of stable regular days off, restricted plaintiff's ability to obtain leave and overtime, and placed plaintiff under working conditions materially worse than those imposed upon comparable supervisors.

52. GREENE's treatment of plaintiff also changed after plaintiff objected to command practices, she reasonably believed were improper, including the alleged downgrading or manipulation of crime classifications and related reporting practices.

53. Plaintiff's objections to alleged crime-classification downgrading placed her in direct conflict with GREENE's command expectations and became part of the retaliatory motive for the later adverse employment actions.

54. After plaintiff opposed discriminatory treatment and objected to alleged crime-classification manipulation, GREENE imposed or caused the imposition of special rules directed at plaintiff concerning chain of command, field deployment, interrupted patrol logs, overtime, Department vehicle usage, and command expectations.

55. Those special rules were not imposed upon similarly situated male and/or non-white supervisors.

56. GREENE also generated or caused the generation of adverse personnel records, including an interim evaluation, command restrictions, and disciplinary narratives that portrayed plaintiff as deficient, insubordinate, or unable to accept direction.

57. DAWES later adopted, repeated, enforced, or continued GREENE's adverse narrative, including through a negative evaluation that plaintiff alleges was copied from GREENE's retaliatory interim evaluation despite DAWES's limited direct observation of plaintiff.

58. The command structure at Transit District 32 is therefore central to this action because GREENE initiated the discriminatory and retaliatory course of conduct, DAWES continued and formalized it, and the NYPD later used the resulting record to justify probationary consequences, modification, demotion, and formal Charges and Specifications.

59. The actions taken by GREENE and DAWES were implemented, ratified, or continued by THE CITY OF NEW YORK through NYPD command, personnel, Risk Management, probationary, disciplinary, and headquarters-level processes.

B. Comparator Evidence

60. Plaintiff was treated less favorably than similarly situated male and/or non-white supervisors assigned to Transit District 32, including with respect to schedules, regular days off, tour flexibility, leave, training, overtime, Department vehicle usage, discipline, command scrutiny, evaluations, and probationary consequences.

Comparator	Race/Gender	Position/Assignment	More Favorable Treatment	Treatment of plaintiff
Lt. Ronald Griffin	Black male	First Platoon Commander	Assigned to steady First Platoon schedule, 2300 x 0745, with Sunday/Monday regular days off. Also approved for a mutual exchange of tours on December 14 into December 15, 2024. Allegedly remained inside the command and/or failed to properly document interrupted patrol without comparable discipline.	plaintiff was assigned to the Replacement Lieutenant schedule with rotating platoons, unstable hours, and less favorable regular days off. plaintiff was denied a mutual exchange for June 4, 2025, despite submitting a leave request months earlier and despite alleged lack of FTU officers to cover that date. plaintiff was also disciplined and evaluated for alleged activity-log and interrupted-patrol issues not applied to Griffin.
Lt. Ronnie Zarabia	Hispanic male	Second Platoon Commander, later Third Platoon Commander	Assigned to steady Second Platoon schedule, 0645 x 1530, with Friday/Saturday regular days off. Later moved to	plaintiff was not given the vacant Third Platoon Commander assignment when available and was instead assigned the less favorable

Comparator	Race/Gender	Position/Assignment	More Favorable Treatment	Treatment of plaintiff
			Third Platoon Commander with Friday/Saturday regular days off to accommodate Lt. Pan's preferred assignment.	Replacement Lieutenant schedule. plaintiff was later denied comparable scheduling flexibility and stable regular days off.
Lt. Mei Pan	Asian male	Field Training Unit Lieutenant, later Second Platoon Commander	While assigned to the same FTU Lieutenant position plaintiff later held, Pan had Friday/Saturday regular days off and was permitted to vary tours, including earlier start times, allegedly to accommodate family and quality-of-life needs. Pan was later approved for the day-tour Second Platoon Commander position.	When plaintiff replaced Pan as FTU Lieutenant on or about February 17, 2025, GREENE gave plaintiff Tuesday/Wednesday regular days off and required later tours, including 1730 x 0215 and 1800 x 0235, instead of Pan's more favorable days off and flexible tours.
Lt. Zagham Abbas	Asian male	Late Night Train Patrol Lieutenant	Held the LNTP assignment before plaintiff with Friday/Saturday regular days off. Allegedly obtained discretionary days off without the same coverage objections, including February 25, March 4, March 5, March 11, and March 12, 2025.	When plaintiff was moved to LNTP on or about April 17, 2025, she was given Tuesday/Wednesday regular days off, even though the system initially reflected the prior Friday/Saturday RDO pattern. plaintiff was denied discretionary leave, including March 24, 2025, based on "coverage" even though Abbas allegedly could cover.

Comparator	Race/Gender	Position/Assignment	More Favorable Treatment	Treatment of plaintiff
Lt. William Fields	Black male	Special Operations Lieutenant	Held a specialty lieutenant position with various/self-determined hours and Sunday/Monday regular days off. Approved for discretionary chart time even when coverage issues allegedly existed. Allegedly lost a Department BWC for approximately three weeks without command discipline.	plaintiff was denied leave and scheduling relief for “coverage” reasons and received command discipline for comparatively minor clerical or log-related allegations. plaintiff was not given similar flexibility or informal handling.
Lt. Jonathan Martinez	Hispanic male	Operations Coordinator	Held various/self-determined hours with Saturday/Sunday regular days off and served as a command intermediary concerning scheduling and leave issues.	plaintiff’s requests were routed through or communicated by Martinez, but GREENE allegedly made the adverse decisions, including denying plaintiff favorable scheduling, denying leave, and maintaining Tuesday/Wednesday regular days off despite comparator treatment.
Sgt. Justin Mateo	Hispanic male	FTU Sergeant	Granted chart days, tour changes, and scheduling flexibility while assigned to the same FTU environment. Approved for a chart day on January 18, 2025, and June 1, 2025. Also allowed to move to desk-	plaintiff was denied leave and mutual-exchange relief for June 4, 2025, allegedly based on “coverage,” even though Mateo was granted comparable or more favorable relief and plaintiff contends no FTU officers required her coverage that day.

Comparator	Race/Gender	Position/Assignment	More Favorable Treatment	Treatment of plaintiff
			officer coverage on dates that left FTU officers without field supervision.	
Sgt. Phillip Coutrier	Black male	Conditions Team / specialty-unit Sergeant	Granted discretionary days or chart time on multiple dates, including December 26, 2024, March 2, 2024, March 30, April 20, May 25, and June 5, 2025, despite specialty-unit coverage concerns.	plaintiff was denied discretionary leave on multiple dates, including November 1, 2024, February 7, 2025, March 24, 2025, March 29, 2025, and June 11, 2025, repeatedly based on "coverage" reasons.
Sgt. Kenyatta McMillan	Black female	Second Platoon Supervisor	Approved for a five-day training course from January 13 through January 17, 2025.	plaintiff scheduled a four-day CIT training course in February 2025, but GREENE caused Lt. Martinez to cancel plaintiff's training and questioned why plaintiff needed the training.
Sgt. Jean Princeton	Black male	Conditions Team / patrol coverage	Allegedly received overtime opportunities and used an RMP without comparable restriction or discipline, including alleged RMP use on June 10, 2025.	plaintiff was restricted from using Department vehicles after special rules were imposed and was denied an RMP for a straight-time detail. plaintiff also alleges she was denied PSB and bag-check overtime that was made available to other supervisors.
Sgt. Jhonny Milfort	Black male	Specialty / crime-reduction overtime	Allegedly used RMP 4414 on June 20 into June 21, 2025, while on crime-reduction overtime and not properly documented in the	plaintiff was told no RMP could be used unless covering patrol and was denied a Department vehicle for a comparable straight-time detail. plaintiff was

Comparator	Race/Gender	Position/Assignment	More Favorable Treatment	Treatment of plaintiff
			interrupted patrol log. Also allegedly used an RMP for a June 14, 2025 MFF portal-to-portal detail.	subjected to RMP restrictions, interrupted-patrol scrutiny, and discipline not imposed on Milfort.
Sgt. Christian Rojas / Lt. Fields coverage example	Rojas: male; Fields: Black male	Crime / specialty-unit coverage	Rojas was allegedly on vacation from December 29, 2024 to January 3, 2025, while Fields covered only part of the period, leaving the unit without full supervisory coverage.	GREENE allegedly told plaintiff that there must be lieutenant or supervisory coverage at all times and used that asserted coverage requirement to deny plaintiff leave and scheduling relief.
Other TD32 supervisors receiving overtime	Male and/or non-white supervisors	TD32 / SOD overtime assignments	plaintiff alleges other supervisors received cash overtime, PSB overtime, bag-check overtime, high-visibility overtime, and other overtime opportunities.	plaintiff's compensatory-time overtime dropped from approximately 30 hours and 22 minutes in March 2025 to 8 hours and 45 minutes in April 2025 and 0 hours in June 2025 after GREENE restricted overtime and required CO/XO approval.
Other Lieutenants assigned to TD32	Male and/or non-white lieutenants	Lieutenant assignments under GREENE	plaintiff alleges no other lieutenant was subjected to the same repeated assignment changes, interim evaluation, special rules, and probationary consequences.	plaintiff was chart-changed or assignment-changed five times in approximately seven months, subjected to special rules after the May 31, 2025 executive conferral, given an adverse interim evaluation, and later subjected to probationary extension, modification, demotion, and formal

Comparator	Race/Gender	Position/Assignment	More Favorable Treatment	Treatment of plaintiff
				Charges and Specifications.

61. The comparator evidence demonstrates that GREENE's stated reasons for plaintiff's unfavorable schedules, leave denials, overtime restrictions, vehicle restrictions, discipline, evaluations, and probationary consequences were pretextual.

62. The comparator evidence also demonstrates that plaintiff was treated less favorably because of race and gender and that the hostility and retaliation escalated after plaintiff objected to discriminatory treatment and alleged crime-classification manipulation.

C. Protected Opposition and Retaliatory Escalation

63. Plaintiff opposed the discriminatory, hostile, and retaliatory treatment directed at her while assigned to Transit District 32.

64. Plaintiff also objected to command practices she reasonably believed were improper, including the alleged downgrading or manipulation of crime classifications and related reporting practices.

65. On or about November 5, 2024, during plaintiff's first Midnight Platoon tour at Transit District 32, plaintiff responded to and supervised multiple incidents, including an incident involving injured police officers.

66. Based upon plaintiff's training, experience, crime-analysis background, the New York State Penal Law, NYPD crime-reference materials, and Department procedures, plaintiff believed the incident required complaint reports for Assault in the Second Degree involving injured police officers.

67. Plaintiff later learned that the classification had been changed from assault-related reporting to resisting arrest.

68. Plaintiff also learned that only one complaint report had been prepared, although plaintiff believed two complaint reports were required.

69. After plaintiff questioned or resisted the downgrading of crime classifications, GREENE criticized plaintiff's handling of the incident, questioned plaintiff's classification judgment, and told plaintiff that she did not need to worry about signing off on reports or invoices.

70. GREENE also accused plaintiff of consuming operational overtime and directed plaintiff to go home.

71. Plaintiff later identified additional alleged crime-classification and reporting concerns arising from incidents on or about November 13, 2024, December 4, 2024, December 9, 2024, December 20, 2024, and December 27, 2024.

72. Those incidents involved documented complaint reports, body-worn camera recordings, witness information, pre-altered classifications, and post-classification records.

73. Plaintiff reasonably believed that the alleged downgrading or manipulation of crime classifications distorted command crime statistics and related Department reporting obligations.

74. Plaintiff refused to conform to command expectations that she believed required her to accept, ignore, or participate in improper crime-classification practices.

75. After plaintiff resisted those practices, GREENE placed plaintiff on desk duty on or about November 27, 2024 and November 28, 2024, thereby removing plaintiff from field-

response duties and limiting plaintiff's ability to make crime-classification determinations in the field.

76. In or about early 2025, plaintiff began communicating with NYPD Risk Management, data-integrity personnel, the Quality Assurance Division, and/or Internal Affairs concerning the alleged crime-classification issues.

77. Plaintiff's objections and disclosures concerning alleged crime-classification downgrading placed her in direct conflict with GREENE's command expectations.

78. On or about May 30, 2025, plaintiff told GREENE that she believed GREENE was targeting her.

79. GREENE reacted with hostility and directed plaintiff to leave GREENE's office.

80. On or about May 31, 2025, plaintiff contacted the NYPD Office of Equity and Inclusion and left a voicemail because it was outside normal business hours.

81. On or about June 1, 2025 and June 3, 2025, plaintiff spoke with Police Officer Rodriguez from OEI Intake and Detective Perez and filed an EEO complaint against GREENE.

82. Plaintiff reported that GREENE was discriminating against her, negatively targeting her, and retaliating against her.

83. On or about May 31, 2025, after plaintiff's confrontation with GREENE and plaintiff's opposition to GREENE's treatment, an executive conferral occurred involving GREENE, DAWES, Lieutenant Maxim Katz, and Lieutenant Jerome Arico from the Lieutenants Benevolent Association.

84. At approximately 0139 hours on May 31, 2025, Lieutenant Maxim Katz generated an email memorializing special rules and restrictions directed at plaintiff.

85. The special rules addressed plaintiff's chain of command, field deployment, interrupted patrol log entries, overtime, Department vehicle usage, and field visibility.

86. The special rules were imposed upon plaintiff only and were not imposed upon similarly situated male and/or non-white supervisors.

87. On or about June 4, 2025, plaintiff was abruptly removed from the Transit District 32 supervisor chat while she was still assigned to the command.

88. Plaintiff was later added back to the supervisor chat, but the communications directed to plaintiff concerned restrictions and expectations that plaintiff alleges were targeted specifically at her.

89. On or about June 6, 2025, plaintiff contacted DAWES because she had been instructed not to contact GREENE without representation present.

90. Plaintiff requested relief concerning a June 8, 2025 Transit District 33 detail, including relief from an excessive multi-tour schedule and permission to use a department vehicle.

91. DAWES denied plaintiff's request to change the overtime assignment and denied plaintiff permission to use a department vehicle.

92. DAWES did so despite plaintiff advising that she would have inadequate sleep before the June 8, 2025 detail and despite DAWES's knowledge of plaintiff's commute burden and medical concerns.

93. On or about June 30, 2025, plaintiff was temporarily transferred to SOD-TPF/ATU 2 Brooklyn.

94. From June 30, 2025 through plaintiff's modification on April 21, 2026 and demotion on April 27, 2026, plaintiff received zero hours of cash overtime.

95. Upon information and belief, similarly situated Lieutenants assigned to SOD-TPF/ATU 2 Brooklyn were permitted to perform overtime during that same period.

96. GREENE and DAWES generated, adopted, repeated, or continued adverse evaluations and disciplinary narratives concerning plaintiff after plaintiff opposed discriminatory treatment and disclosed alleged crime-classification manipulation.

97. DAWES generated a negative evaluation concerning plaintiff despite limited direct observation of plaintiff and despite plaintiff's transfer away from Transit District 32 before the end of the relevant rating period.

98. On or about August 11, 2025, plaintiff was directed to report to the Risk Management Bureau at 375 Pearl Street.

99. At that meeting, plaintiff was advised that her probationary period in the rank of Lieutenant was being extended based upon a self-initiated recommendation by GREENE.

100. Plaintiff had been scheduled to complete probation in the rank of Lieutenant on or about October 24, 2025.

101. As a result of the probationary extension, plaintiff's probation was extended to on or about April 23, 2026.

102. On or about April 21, 2026, plaintiff was modified.

103. On or about April 27, 2026, Captain Singh and Lieutenant Pan came to 518 Metropolitan at approximately 0900 hours, placed plaintiff on modified assignment, and took plaintiff's firearms, shield, and identification card.

104. Captain Singh and Lieutenant Pan did not provide plaintiff with a reason for the modification.

105. Plaintiff was then directed to report to 375 Pearl Street.

106. At approximately 1115 hours on April 27, 2026, plaintiff was served with demotion paperwork.

107. Plaintiff refused to sign paperwork agreeing to the demotion.

108. Lieutenant Brown advised plaintiff that the order came directly from the Police Commissioner's Office, but no explanation was provided to plaintiff.

109. Plaintiff was thereafter assigned to Brooklyn Criminal Courts.

110. On or about May 20, 2026, the NYPD preferred formal Charges and Specifications against plaintiff under CHIA 2026-1625 / IAB Log No. 2026-18017.

111. The Charges and Specifications arose from the June 8, 2025 Transit District 33 detail, the same detail for which plaintiff had sought relief from DAWES after special rules and restrictions had been imposed upon her.

112. The sequence of events demonstrates retaliatory escalation: plaintiff objected to alleged crime-classification manipulation; plaintiff opposed discriminatory and retaliatory treatment; plaintiff complained to EEO and through Department channels; GREENE and DAWES imposed special rules and restrictions; plaintiff was isolated, scrutinized, denied overtime, negatively evaluated, transferred, subjected to probationary consequences, modified, demoted, and then formally charged.

113. The protected opposition and subsequent escalation support plaintiff's retaliation claims and further support the inference that GREENE's and DAWES's stated reasons were pretextual.

D. Probationary Consequences, Modification, and Demotion

114. The discriminatory and retaliatory record generated or influenced by GREENE and continued by DAWES was later used to impose probationary consequences, modification, demotion, and continuing employment harm upon plaintiff.

115. On or about August 11, 2025, plaintiff was directed to report to the Risk Management Bureau at 375 Pearl Street, New York, New York.

116. At that meeting, plaintiff was advised by Lieutenant Brown that plaintiff's probationary period in the rank of Lieutenant was being extended.

117. Lieutenant Brown advised plaintiff that the probationary extension was based upon a self-initiated recommendation by GREENE.

118. plaintiff had been scheduled to complete probation in the rank of Lieutenant on or about October 24, 2025.

119. As a result of GREENE's self-initiated recommendation and the adverse record generated against plaintiff, plaintiff's probationary period was extended to on or about April 23, 2026.

120. The probationary extension was not an isolated personnel action.

121. The probationary extension was the product of the discriminatory, hostile, and retaliatory course of conduct that began after plaintiff's assignment to Transit District 32 and escalated after plaintiff opposed discriminatory treatment and objected to the alleged downgrading or manipulation of crime classifications.

122. On or about April 21, 2026, plaintiff was modified.

123. On or about April 27, 2026, Captain Ravi Singh and Lieutenant Mei Pan appeared at 518 Metropolitan at approximately 0900 hours.

124. Captain Singh and Lieutenant Pan placed plaintiff on modified assignment and took plaintiff's firearms, shield, and identification card.

125. Captain Singh and Lieutenant Pan did not provide plaintiff with a reason for the modification.

126. Plaintiff was then directed to report to 375 Pearl Street.

127. At approximately 1115 hours on April 27, 2026, plaintiff was served with paperwork demoting her from the rank of Lieutenant.

128. Plaintiff refused to sign paperwork agreeing to the demotion.

129. Lieutenant Brown advised plaintiff that the demotion order came directly from the Police Commissioner's Office.

130. No defendant provided plaintiff with a legitimate, non-discriminatory, and non-retaliatory explanation for the demotion.

131. Upon information and belief, plaintiff's modification and demotion were implemented, approved, ratified, maintained, or continued through defendant JESSICA S. TISCH.

132. After her demotion, plaintiff was assigned to Brooklyn Criminal Courts.

133. The modification and demotion were the culmination of the discriminatory, hostile, and retaliatory course of conduct initiated by GREENE, continued by DAWES, and implemented, approved, ratified, maintained, or continued through NYPD command, Risk Management, personnel, probationary, disciplinary, headquarters-level, and Commissioner-level processes.

134. The demotion caused plaintiff to lose rank, compensation, professional standing, overtime opportunities, promotional opportunities, and career advancement.

135. The demotion also damaged plaintiff's professional reputation within the NYPD and subjected her to continuing employment harm.

136. The probationary extension, modification, and demotion support plaintiff's claims for race discrimination, gender discrimination, hostile work environment, and retaliation under the NYSHRL and NYCHRL.

E. Formal Charges and Specifications

137. In addition to plaintiff's probationary extension, modification, and demotion, the NYPD later preferred formal Charges and Specifications against plaintiff.

138. On or about May 20, 2026, formal Charges and Specifications were preferred against plaintiff under CHIA 2026-1625 / IAB Log No. 2026-18017.

139. The Charges and Specifications arose from plaintiff's assignment to a June 8, 2025 Transit District 33 detail.

140. That June 8, 2025 detail was the same detail for which plaintiff had previously requested relief from DAWES after special rules and restrictions had been imposed upon her.

141. Before the June 8, 2025 detail, plaintiff advised DAWES that she had been assigned to an excessive multi-tour schedule, that she would have inadequate sleep before the detail, and that she needed relief concerning the assignment and permission to use a department vehicle.

142. DAWES denied plaintiff's request to change the overtime assignment and denied plaintiff permission to use a department vehicle.

143. The Charges and Specifications alleged, among other things, that plaintiff failed to appear timely for the June 8, 2025 detail, failed to submit a lost-time report, failed to scan in

and out through the Department attendance system, and caused false entries in Department records concerning an activity log and overtime request.

144. The Charges and Specifications were preferred after plaintiff had already been modified on or about April 21, 2026 and demoted from the rank of Lieutenant on or about April 27, 2026.

145. The May 21, 2026 Internal Affairs Bureau memorandum concerning the Charges and Specifications expressly noted that plaintiff was already modified and had been demoted from the rank of Lieutenant.

146. Upon information and belief, the Charges and Specifications were processed, approved, maintained, ratified, or continued through NYPD disciplinary, personnel, headquarters-level, and defendant JESSICA S. TISCH.

147. The Charges and Specifications continued the same adverse narrative GREENE and DAWES had generated against plaintiff while she was assigned to Transit District 32.

148. GREENE had previously used the June 8, 2025 detail as part of plaintiff's adverse interim evaluation, including allegations concerning plaintiff's field presence, activity log, meal period, and interrupted patrol.

149. plaintiff alleges that the June 8, 2025 detail was mischaracterized and weaponized against her after she opposed discriminatory treatment, complained to EEO, objected to alleged crime-classification manipulation, and sought Department intervention.

150. The timing and content of the Charges and Specifications support the inference that plaintiff was subjected to continuing retaliation.

151. The Charges and Specifications further damaged plaintiff's employment record, reputation, rank status, promotional standing, compensation, overtime opportunities, and career prospects.

152. The Charges and Specifications were not isolated from the discrimination and retaliation alleged herein.

153. Rather, they were part of the same continuing course of conduct through which GREENE, DAWES, and the NYPD converted pretextual command allegations into formal adverse employment consequences.

154. The formal Charges and Specifications are maintained within NYPD disciplinary and personnel systems subject to City and Commissioner-level authority, and plaintiff seeks appropriate relief requiring correction, removal, rescission, or other equitable remedy as permitted by law.

F. Resulting Harm

155. As a result of the discriminatory, hostile, and retaliatory conduct alleged herein, plaintiff suffered material harm to the terms, conditions, and privileges of her NYPD employment.

156. Plaintiff lost the rank of Lieutenant when she was demoted on or about April 27, 2026.

157. Plaintiff lost compensation, benefits, overtime opportunities, supervisory authority, professional standing, promotional opportunity, and career advancement associated with the rank of Lieutenant.

158. Plaintiff was modified, stripped of her firearms, shield, and identification card, and removed from the duties, status, and authority associated with her prior rank and assignment.

159. Plaintiff was reassigned to Brooklyn Criminal Courts after her demotion.

160. Plaintiff was also subjected to formal Charges and Specifications under CHIA 2026-1625 / IAB Log No. 2026-18017 after she had already been modified and demoted.

161. The formal Charges and Specifications further damaged plaintiff's employment record, reputation, rank status, promotional standing, compensation, overtime opportunities, and career prospects.

162. The negative evaluations, command restrictions, probationary extension, modification, demotion, and formal Charges and Specifications caused continuing harm to plaintiff's NYPD career.

163. Plaintiff also suffered emotional distress, humiliation, embarrassment, stress, anxiety, reputational injury, and loss of professional dignity.

164. Plaintiff was deprived of equal terms, conditions, and privileges of employment because of race and gender.

165. Plaintiff was subjected to a hostile work environment because of race and gender.

166. Plaintiff was retaliated against because she opposed discriminatory treatment, complained through Department channels, and objected to alleged improper command practices, including the alleged downgrading or manipulation of crime classifications and related reporting practices.

167. The conduct of GREENE and DAWES was implemented, ratified, maintained, or continued by THE CITY OF NEW YORK through NYPD command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

168. Defendant TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional harms challenged in this action.

169. Plaintiff requires legal and equitable relief directed to THE CITY OF NEW YORK and NYPD Commissioner-level authority, including correction of personnel records, restoration of rank and benefits where appropriate, removal or correction of discriminatory and retaliatory records, rescission or correction of adverse employment consequences, and cessation of continuing retaliatory employment consequences.

170. The conduct alleged herein violates the New York State Human Rights Law and the New York City Human Rights Law.

CONCLUSION

171. The acts alleged herein were not isolated personnel decisions, ordinary supervisory disagreements, or neutral exercises of command discretion.

172. GREENE used her command authority at Transit District 32 to treat plaintiff less favorably than similarly situated male and/or non-white supervisors with respect to schedules, regular days off, tour flexibility, leave, overtime, Department vehicle usage, scrutiny, discipline, evaluations, and command treatment.

173. After plaintiff objected to discriminatory targeting, complained through Department channels, and refused to conform to command practices she reasonably believed involved the downgrading or manipulation of crime classifications, GREENE escalated the treatment.

174. GREENE's conduct then moved from unequal treatment to formal career damage, including special rules directed at plaintiff, adverse evaluations, probationary consequences, disciplinary narratives, and restrictions that were not imposed upon comparable supervisors.

175. DAWES continued, enforced, adopted, and formalized GREENE's adverse narrative, including through discipline, denial of relief from retaliatory working conditions, and a negative evaluation that plaintiff alleges lacked a legitimate factual basis.

176. THE CITY OF NEW YORK, through the NYPD, allowed those discriminatory, hostile, and retaliatory actions to become formal employment consequences, including modification, demotion from the rank of Lieutenant, formal Charges and Specifications, loss of compensation, loss of overtime opportunities, damage to plaintiff's personnel record, and continuing career harm.

177. TISCH, in her official capacity as Police Commissioner, is responsible for the Commissioner-level and headquarters-level authority through which plaintiff's rank status, disciplinary records, personnel records, modification, demotion, employment restrictions, and continuing institutional consequences were implemented, maintained, ratified, continued, or remain subject to correction.

178. The record, taken as a whole, demonstrates a continuing course of race discrimination, gender discrimination, hostile work environment, and retaliation in violation of the New York State Human Rights Law and the New York City Human Rights Law.

179. Plaintiff therefore seeks judgment against defendants, together with all damages, declaratory relief, equitable relief, attorneys' fees, costs, interest, and such other and further relief as this Court deems just and proper.

VIOLATIONS AND CLAIMS ALLEGED

COUNT I
Race Discrimination in Violation of the
New York State Human Rights Law
Against All Defendants

180. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

181. At all relevant times, plaintiff was a white female NYPD employee and was protected from race discrimination under the New York State Human Rights Law.

182. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York State Human Rights Law.

183. At all relevant times, defendants TAMECCA GREENE and JAMES A. DAWES were supervisory employees and agents of THE CITY OF NEW YORK and the NYPD.

184. Defendants GREENE and DAWES are sued in their individual and official capacities.

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

186. Plaintiff was qualified for her position and performed her duties as an NYPD Lieutenant.

187. While assigned to Transit District 32, plaintiff was treated less favorably than similarly situated non-white supervisors with respect to schedules, regular days off, tour flexibility, leave, overtime opportunities, Department vehicle usage, command scrutiny, discipline, evaluations, probationary consequences, modification, demotion, formal Charges and Specifications, and related terms, conditions, and privileges of employment.

188. GREENE, a Black female and then-Commanding Officer of Transit District 32, personally participated in, directed, approved, ratified, and/or continued the race-based disparate treatment of plaintiff.

189. GREENE treated similarly situated non-white supervisors more favorably than plaintiff under comparable circumstances, including by affording them more favorable schedules, regular days off, leave, overtime opportunities, Department vehicle access, chart days, tour flexibility, command tolerance, and less severe discipline or scrutiny.

190. DAWES, a Black male and Executive Officer of Transit District 32, personally participated in, enforced, adopted, approved, ratified, and/or continued the discriminatory treatment of plaintiff, including through discipline, restrictions, evaluations, and continuation of GREENE's adverse narrative.

191. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the race-based disparate treatment through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

192. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

193. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the discriminatory practices alleged herein.

194. The conduct of defendants constituted race discrimination in violation of the New York State Human Rights Law.

195. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities, loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

Count II
Gender Discrimination in Violation of the
New York State Human Rights Law
Against All Defendants

196. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

197. At all relevant times, plaintiff was a female NYPD employee and was protected from gender discrimination under the New York State Human Rights Law.

198. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York State Human Rights Law.

199. At all relevant times, defendants GREENE and DAWES were supervisory employees and agents of THE CITY OF NEW YORK and the NYPD.

200. Defendants GREENE and DAWES are sued in their individual and official capacities.

201. Defendant TISCH is sued in her individual and official capacities as Police Commissioner of the City of New York.

202. Plaintiff was qualified for her position and performed her duties as an NYPD Lieutenant.

203. While assigned to Transit District 32, plaintiff was treated less favorably than similarly situated male supervisors with respect to schedules, regular days off, tour flexibility, leave, overtime opportunities, Department vehicle usage, command scrutiny, discipline,

evaluations, probationary consequences, modification, demotion, formal Charges and Specifications, and related terms, conditions, and privileges of employment.

204. GREENE personally participated in, directed, approved, ratified, and/or continued gender-based disparate treatment by treating similarly situated male supervisors more favorably than plaintiff under comparable circumstances.

205. Male supervisors received more favorable schedules, regular days off, tour flexibility, leave approvals, overtime opportunities, Department vehicle access, chart days, mutual-tour accommodations, command tolerance, and less severe scrutiny or discipline than plaintiff.

206. DAWES personally participated in, enforced, adopted, approved, ratified, and/or continued the gender-based disparate treatment of plaintiff, including through discipline, restrictions, evaluations, and continuation of GREENE's adverse narrative.

207. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the gender-based disparate treatment through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

208. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

209. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the discriminatory practices alleged herein.

210. The conduct of defendants constituted gender discrimination in violation of the New York State Human Rights Law.

211. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities, loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

Count III
Hostile Work Environment in Violation of the
New York State Human Rights Law
Against All Defendants

212. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

213. At all relevant times, plaintiff was protected from a hostile work environment based upon race and gender under the New York State Human Rights Law.

214. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York State Human Rights Law.

215. At all relevant times, defendants GREENE and DAWES were supervisory employees and agents of THE CITY OF NEW YORK and the NYPD.

216. Defendants GREENE and DAWES are sued in their individual and official capacities.

217. Defendant TISCH is sued in her individual and official capacities as Police Commissioner of the City of New York.

218. GREENE subjected plaintiff to a hostile work environment by using command authority to destabilize plaintiff's assignments, schedules, regular days off, leave, overtime, Department vehicle usage, field expectations, evaluations, discipline, and command standing.

219. GREENE imposed special rules directed at plaintiff, subjected plaintiff to heightened scrutiny, denied plaintiff workplace benefits afforded to similarly situated male and/or non-white supervisors, and caused or contributed to adverse evaluations and disciplinary narratives against plaintiff.

220. DAWES participated in, enforced, adopted, approved, ratified, and/or continued the hostile work environment by enforcing restrictions, denying relief, participating in discipline, and generating or adopting adverse narratives concerning plaintiff's performance and conduct.

221. The hostile work environment was based, at least in part, upon plaintiff's race and gender.

222. The hostile work environment altered the terms, conditions, and privileges of plaintiff's employment and subjected plaintiff to inferior treatment, professional humiliation, reputational harm, and continuing employment injury.

223. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the hostile work environment through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

224. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

225. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the hostile work environment alleged herein.

226. The conduct of defendants constituted a hostile work environment in violation of the New York State Human Rights Law.

227. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities, loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

**Count IV
Retaliation in Violation of the
New York State Human Rights Law
Against All Defendants**

228. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

229. At all relevant times, plaintiff was protected from retaliation under the New York State Human Rights Law.

230. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York State Human Rights Law.

231. At all relevant times, defendants GREENE and DAWES were supervisory employees and agents of THE CITY OF NEW YORK and the NYPD.

232. Defendants GREENE and DAWES are sued in their individual and official capacities.

233. Defendant TISCH is sued in her individual and official capacities as Police Commissioner of the City of New York.

234. Plaintiff engaged in protected activity by opposing discriminatory, hostile, and retaliatory treatment directed at her while assigned to Transit District 32.

235. Plaintiff also complained through Department channels concerning GREENE's discriminatory and retaliatory treatment.

236. Plaintiff further objected to command practices she reasonably believed were improper, including the alleged downgrading or manipulation of crime classifications and related reporting practices.

237. After plaintiff engaged in protected activity, GREENE retaliated against plaintiff by imposing special rules, restricting overtime, restricting Department vehicle usage, denying leave and scheduling relief, subjecting plaintiff to heightened scrutiny, generating adverse evaluations, initiating or influencing probationary consequences, and causing or contributing to modification, demotion, formal Charges and Specifications, and continuing career harm.

238. DAWES retaliated against plaintiff by enforcing or continuing GREENE's restrictions, denying relief from retaliatory working conditions, participating in discipline, denying plaintiff's request concerning the June 8, 2025 Transit District 33 detail, and generating or adopting adverse narratives concerning plaintiff.

239. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the retaliatory conduct through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

240. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

241. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the retaliatory practices alleged herein.

242. The retaliatory actions would reasonably deter a person from opposing discrimination, complaining through Department channels, or objecting to improper command practices.

243. The conduct of defendants constituted retaliation in violation of the New York State Human Rights Law.

244. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities, loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

Count V
Race Discrimination in Violation of the
New York City Human Rights Law
Against All Defendants

245. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

246. At all relevant times, plaintiff was protected from race discrimination under the New York City Human Rights Law.

247. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York City Human Rights Law.

248. At all relevant times, defendants TAMECCA GREENE and JAMES A. DAWES were supervisory employees, agents, and/or persons acting on behalf of THE CITY OF NEW YORK and the NYPD.

249. Defendants GREENE and DAWES are sued in their individual and official capacities.

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

251. Plaintiff was qualified for her position and performed her duties as an NYPD Lieutenant.

252. While assigned to Transit District 32, plaintiff was treated less well than similarly situated non-white supervisors because of race.

253. GREENE, a Black female and then-Commanding Officer of Transit District 32, personally participated in, directed, approved, ratified, and/or continued the race-based disparate treatment of plaintiff.

254. GREENE treated similarly situated non-white supervisors more favorably than plaintiff with respect to schedules, regular days off, tour flexibility, leave, overtime opportunities, Department vehicle usage, command scrutiny, discipline, evaluations, probationary consequences, modification, demotion, formal Charges and Specifications, and related terms, conditions, and privileges of employment.

255. GREENE afforded non-white supervisors more favorable schedules, regular days off, leave approvals, overtime opportunities, Department vehicle access, chart days, tour flexibility, mutual-tour accommodations, command tolerance, and less severe discipline or scrutiny than plaintiff.

256. DAWES, a Black male and Executive Officer of Transit District 32, personally participated in, enforced, adopted, approved, ratified, and/or continued the race-based disparate treatment of plaintiff, including through discipline, restrictions, evaluations, and continuation of GREENE's adverse narrative.

257. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the race-based disparate treatment through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

258. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

259. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the discriminatory practices alleged herein.

260. Defendants' conduct deprived plaintiff of equal treatment and caused plaintiff to be treated less well, at least in part, because of race.

261. The conduct of defendants constituted race discrimination in violation of the New York City Human Rights Law.

262. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities, loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

Count VI
Gender Discrimination in Violation of the
New York City Human Rights Law
Against All Defendants

263. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

264. At all relevant times, plaintiff was protected from gender discrimination under the New York City Human Rights Law.

265. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York City Human Rights Law.

266. At all relevant times, defendants GREENE and DAWES were supervisory employees, agents, and/or persons acting on behalf of THE CITY OF NEW YORK and the NYPD.

267. Defendants GREENE and DAWES are sued in their individual and official capacities.

268. Defendant TISCH is sued in her individual and official capacities as Police Commissioner of the City of New York.

269. Plaintiff was qualified for her position and performed her duties as an NYPD Lieutenant.

270. While assigned to Transit District 32, plaintiff was treated less well than similarly situated male supervisors because of gender.

271. GREENE personally participated in, directed, approved, ratified, and/or continued gender-based disparate treatment by treating similarly situated male supervisors more favorably than plaintiff under comparable circumstances.

272. Male supervisors received more favorable schedules, regular days off, tour flexibility, leave approvals, overtime opportunities, Department vehicle access, chart days, mutual-tour accommodations, command tolerance, and less severe scrutiny or discipline than plaintiff.

273. Plaintiff was denied those same workplace benefits and was subjected to heightened scrutiny, discipline, adverse evaluations, probationary consequences, modification, demotion, formal Charges and Specifications, and continuing employment harm.

274. DAWES personally participated in, enforced, adopted, approved, ratified, and/or continued the gender-based disparate treatment of plaintiff, including through discipline, restrictions, evaluations, and continuation of GREENE's adverse narrative.

275. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the gender-based disparate treatment through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

276. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

277. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the discriminatory practices alleged herein.

278. Defendants' conduct deprived plaintiff of equal treatment and caused plaintiff to be treated less well, at least in part, because of gender.

279. The conduct of defendants constituted gender discrimination in violation of the New York City Human Rights Law.

280. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities,

loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

Count VII
Hostile Work Environment in Violation of the
New York City Human Rights Law
Against All Defendants

281. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

282. At all relevant times, plaintiff was protected from a hostile work environment based upon race and gender under the New York City Human Rights Law.

283. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York City Human Rights Law.

284. At all relevant times, defendants GREENE and DAWES were supervisory employees, agents, and/or persons acting on behalf of THE CITY OF NEW YORK and the NYPD.

285. Defendants GREENE and DAWES are sued in their individual and official capacities.

286. Defendant TISCH is sued in her individual and official capacities as Police Commissioner of the City of New York.

287. GREENE subjected plaintiff to a hostile work environment by using command authority to treat plaintiff less well than similarly situated male and/or non-white supervisors.

288. GREENE destabilized plaintiff's assignments, schedules, regular days off, leave, overtime, Department vehicle usage, field expectations, evaluations, discipline, and command standing.

289. GREENE imposed special rules directed at plaintiff, subjected plaintiff to heightened scrutiny, denied plaintiff workplace benefits afforded to similarly situated male and/or non-white supervisors, and caused or contributed to adverse evaluations and disciplinary narratives against plaintiff.

290. GREENE's conduct included repeated schedule manipulation, denial of favorable regular days off, denial of tour flexibility, denial of leave under pretextual coverage rationales, restriction of overtime, restriction of Department vehicle usage, isolation from normal command communications, heightened scrutiny, adverse evaluations, probationary consequences, modification, demotion, and formal Charges and Specifications.

291. DAWES participated in, enforced, adopted, approved, ratified, and/or continued the hostile work environment by enforcing restrictions, denying relief, participating in discipline, denying relief concerning the June 8, 2025 Transit District 33 detail, and generating or adopting adverse narratives concerning plaintiff's performance and conduct.

292. The hostile work environment was based, at least in part, upon plaintiff's race and gender.

293. The conduct alleged herein caused plaintiff to be treated less well than similarly situated male and/or non-white supervisors and was more than petty slights or trivial inconveniences.

294. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the hostile work environment through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

295. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

296. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the hostile work environment alleged herein.

297. The conduct of defendants constituted a hostile work environment in violation of the New York City Human Rights Law.

298. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities, loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

Count VIII
Retaliation in Violation of the
New York City Human Rights Law
Against All Defendants

299. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

300. At all relevant times, plaintiff was protected from retaliation under the New York City Human Rights Law.

301. At all relevant times, defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the New York City Human Rights Law.

302. At all relevant times, defendants TAMECCA GREENE and JAMES A. DAWES were supervisory employees, agents, and/or persons acting on behalf of THE CITY OF NEW YORK and the NYPD.

303. Defendants GREENE and DAWES are sued in their individual and official capacities.

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

305. Plaintiff engaged in protected activity by opposing discriminatory, hostile, and retaliatory treatment directed at her while assigned to Transit District 32.

306. Plaintiff complained through Department channels concerning GREENE's discriminatory and retaliatory treatment.

307. Plaintiff also objected to command practices she reasonably believed were improper, including the alleged downgrading or manipulation of crime classifications and related reporting practices.

308. Plaintiff's objections to alleged crime-classification manipulation are pleaded as protected opposition, motive evidence, hostile-environment evidence, and pretext evidence supporting her retaliation claim under the New York City Human Rights Law.

309. After plaintiff engaged in protected activity, GREENE retaliated against plaintiff by imposing special rules, restricting overtime, restricting Department vehicle usage, denying leave and scheduling relief, subjecting plaintiff to heightened scrutiny, generating adverse evaluations, initiating or influencing probationary consequences, and causing or contributing to plaintiff's modification, demotion, formal Charges and Specifications, and continuing career harm.

310. DAWES retaliated against plaintiff by enforcing or continuing GREENE's restrictions, denying plaintiff relief from retaliatory working conditions, participating in

discipline, denying plaintiff's request concerning the June 8, 2025 Transit District 33 detail, and generating or adopting adverse narratives concerning plaintiff's performance and conduct.

311. THE CITY OF NEW YORK, through the NYPD, implemented, approved, ratified, maintained, or continued the retaliatory conduct through command, personnel, probationary, disciplinary, Risk Management, headquarters-level, and Commissioner-level processes.

312. TISCH, in her official capacity as Police Commissioner, maintains authority over the NYPD records, rank status, disciplinary consequences, modification, demotion, employment restrictions, and continuing institutional consequences challenged in this action.

313. The individual defendants directly participated in, aided, abetted, incited, compelled, coerced, approved, ratified, and/or continued the retaliatory practices alleged herein.

314. Defendants' retaliatory conduct was reasonably likely to deter a person from opposing discrimination, complaining about unequal treatment, reporting discriminatory or retaliatory conduct, or objecting to improper command practices.

315. Defendants' retaliatory conduct caused plaintiff to be treated less well because she opposed discrimination, complained through Department channels, and objected to command practices she reasonably believed were improper.

316. The conduct of defendants constituted retaliation in violation of the New York City Human Rights Law.

317. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, loss of rank, loss of compensation, loss of overtime opportunities, loss of benefits, damage to her professional reputation, emotional distress, humiliation, embarrassment, and continuing career harm.

JURY TRIAL

318. Plaintiff DINA L. SANFRATELLO hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff DINA L. SANFRATELLO respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, TAMECCA GREENE, and JAMES A. DAWES, jointly and severally where permitted by law, as follows:

- a. declaring that defendants violated plaintiff's rights under the New York State Human Rights Law;
- b. declaring that defendants violated plaintiff's rights under the New York City Human Rights Law;
- c. reinstating plaintiff to the rank of Lieutenant, with restoration of all rank, title, duties, privileges, authority, command status, employment status, and career standing associated with the rank of Lieutenant;
- d. awarding plaintiff full back pay, including all wages, salary differentials, overtime, lost overtime opportunities, premium pay, differentials, pension contributions, pension credits, leave accruals, benefits, and all other compensation and emoluments lost as a result of defendants' unlawful conduct;
- e. restoring plaintiff's seniority, time-in-rank, service credit, pension credit, leave accruals, promotional eligibility, benefits, and all other employment rights and privileges she would have received but for defendants' unlawful conduct;

- f. directing defendants to correct, remove, rescind, expunge, and/or seal all discriminatory, hostile, retaliatory, false, unsupported, or pretextual personnel records, evaluations, disciplinary records, probationary records, modification records, demotion records, Charges and Specifications, and related employment records;
- g. directing defendants to rescind, correct, or otherwise remedy the formal Charges and Specifications preferred under CHIA 2026-1625 / IAB Log No. 2026-18017, together with all related disciplinary and personnel consequences, to the fullest extent permitted by law;
- h. awarding plaintiff compensatory damages in an amount to be determined at trial;
- i. awarding plaintiff damages for emotional distress, humiliation, embarrassment, reputational harm, loss of professional dignity, and other non-economic injuries;
- j. awarding plaintiff front pay if reinstatement or full equitable restoration is unavailable, incomplete, delayed, impracticable, or otherwise inadequate;
- k. awarding plaintiff punitive damages against the individual defendants to the fullest extent permitted by law;
- l. awarding plaintiff attorneys' fees, costs, disbursements, and interest as permitted by the New York State Human Rights Law, the New York City Human Rights Law, the CPLR, and other applicable law; and
- m. granting such other and further relief as this Court deems just, proper, and equitable.

Dated: June 25, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DINA L. SANFRATELLO

THE SANDERS FIRM, P.C.
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(212) 652-2782 (Business Telephone)
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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 pursuant to CPLR 2106.

Dated: June 25, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DINA L. SANFRATELLO

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

INDEX NO.:

DINA L. SANFRATELLO

Plaintiff,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, TAMECCA
GREENE, and JAMES A. DAWES

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders

Attorney for Plaintiff DINA L. SANFRATELLO

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