

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

-----X

DANA RACHLIN,

Plaintiff,

-against-

THE CITY OF NEW YORK, MAYOR OF THE CITY
OF NEW YORK ERIC ADAMS, NYPD CHIEF OF
DEPARTMENT JEFFREY MADDREY, NYPD
COMMUNITY COORDINATOR BRIAN ADAMS,
NYPD CHIEF OF PATROL JOHN CHELL, NYPD
INSPECTOR CRAIG EDELMAN, NYPD DEPUTY
COMMISSIONER KAZ DAUGHTRY, and NYPD
MEMBERS JOHN or JANE DOE # 1 – 5,

Defendants.

**VERIFIED
SUPPLEMENTAL
PLEADING**

Index No.: 1:24-cv-02626

-----X

Plaintiff, **DANA RACHLIN**, by her attorneys, **KAISHIAN & MORTAZAVI LLC**, by **MARYANNE K. KAISHIAN**, an attorney duly licensed to practice before the United States District Court for the Eastern District of New York, hereby provides the following **SUPPLEMENTAL PLEADING**, pursuant to Fed. R. Civ. P. 15(d), for inclusion with Plaintiff's pleadings including the Second Amended Complaint and Exhibits:

1. On May 12, 2026, Defendant John Chell made further false statements concerning Ms. Rachlin and her organization, We Build the Block.
2. Defendant Chell uses the social media platform "X."
3. Defendant Chell posts using the social media handle "@JohnMChell" and his account is verified. Defendant Chell has utilized this verified "X" account since 2024.
4. Defendant Chell's verified account features his photograph in NYPD uniform and

identifies him as the “NYPD Chief of Dept. (Ret).”



Defendant Chell's May 12 post on "X."

6. Defendant Chell's statement was published to 2,999 followers and viewed approximately 1,900 times at the time of this submission.
7. Defendant Chell's profile is public and permits any member of the public to view his posts.
8. Defendant Chell's "verified" status on the platform permits him to write posts with higher character limits and to reach a wider audience than a standard "X" profile does.
9. "X" charges Defendant a monthly fee to maintain the enhanced features and visibility of verified status.
10. Defendant has evinced clear intent that statements he publishes on "X" reach a new and broad audience.¹

¹ On April 27, 2026, Defendant utilized the site to announce his 2029 candidacy for Mayor of New York City.

11. Defendant Chell's statement, published May 12, 2026, calls Ms. Rachlin's organization We Build the Block "a scam" and refers to Ms. Rachlin as "some grifter from Staten Island who's been shunned by the NYPD for years and only wants clout and money."
12. Defendant Chell, in sum and substance, discouraged partnership with and defamed Ms. Rachlin and her organization.
13. Defendant Chell, in sum and substance, confirmed the existence of a concerted effort within the NYPD to "shun" Ms. Rachlin from participation in public life.
14. Defendant Chell continues to participate in this effort.
15. This May 12 statement further reiterated the substance of false allegations against Plaintiff previously made by Defendants, including that Plaintiff is dishonest, abuses public trust, and misuses her community safety organization for criminal activities.
16. Defendant Chell made this statement in response to an article in the news publication *Gothamist*, which covered a community safety event that Ms. Rachlin helped orchestrate earlier this month. The article featured, named, and quoted Ms. Rachlin in her capacity as director of We Build the Block and identified her as the organization's co-founder.² Defendant Chell included a link to this article in his post.

Dated: June 24, 2026

KAISHIAN & MORTAZAVI LLC

Attorneys for Plaintiff

By: 

Maryanne K. Kaishian
55 Washington Street, Ste. 461
Brooklyn, New York 11201
T: (347) 662-2421
E: eservice@kaishianlaw.com

² Ben Feuerherd, Brownsville Civilians Handle Crises in a Model Mayor Mamdani May Expand, *GOTHAMIST* (May 12, 2026), <https://gothamist.com/news/brownsville-civilians-handle-crises-in-a-model-mayor-mamdani-may-expand>.

PLAINTIFF VERIFICATION

I, **DANA RACHLIN**, affirm the following to be true under the penalties of perjury:

1. I am the PLAINTIFF in the above matter, *Rachlin v City of New York, et al.*, 24-cv-02626 (FB).
2. I am over 18 years old.
3. I am a lawful adult resident of KINGS COUNTY, State of New York.
4. I have read the annexed SUPPLEMENTAL PLEADING, dated June 24, 2026, which was filed as a supplement to the Verified Amended Complaint, and know the contents thereof, and the statements contained therein are true to my knowledge.

DATE: 6/24/26

SIGN: Dana Rachlin

PRINT: DANA RACHLIN

STATE OF NEW YORK)

SS.

COUNTY OF KINGS)

On June 24, 2026, before me, the undersigned notary public, personally appeared Dana Rachlin, either by physical presence or, where so indicated by the Notary Seal below, via electronic means in accordance with my New York State license as a notary and electronic notary. This individual is known to me, or, on the basis of satisfactory evidence provided to me, has proved to me to be the individual(s) whose name(s) is/are subscribed to the within instrument. The individual(s) acknowledged to me that they executed the same their capacity, and that by their signature(s) on the instrument, the individual(s) executed the instrument.

MARYANNE K KAISHIAN
NOTARY PUBLIC, STATE OF NEW YORK
NO. 02KA0015799
QUALIFIED IN KINGS COUNTY
MY COMMISSION EXPIRES NOV. 7, 2027

Maryanne K Kaishian
Notary Public