

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----x
BRIAN K. ADAMS

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK; JESSICA S. TISCH, RYAN
MEROLA, EDWARD A. THOMPSON, JOSEPH A.
DIBARTOLOMEO, RICHARD S. TAYLOR, KENNETH J.
HARSCH, JANE DOE 1, and MATTHEW MILLER

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.

The basis of venue is CPLR 503(a) and CPLR 503(c). Plaintiff resides in Nassau County and designates Bronx County as the place of trial because defendant THE CITY OF NEW YORK is a municipal defendant situated within the City of New York, because the individually

named defendants are New York City Police Department officials, executives, officers, or employees whose challenged conduct arose from their official duties within the City of New York, and because a substantial part of the acts and omissions giving rise to plaintiff's claims occurred within the City of New York, including Bronx County.

Dated: July 6, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff BRIAN K. ADAMS

THE SANDERS FIRM, P.C.
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New York, NY 10005
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DEFENDANT ADDRESSES

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

JESSICA S. TISCH, RYAN MEROLA, EDWARD A. THOMPSON, JOSEPH A.
DIBARTOLOMEO, RICHARD S. TAYLOR, KENNETH J. HARSCH, JANE DOE 1,
and MATTHEW MILLER
c/o New York City Police Department
Legal Bureau
One Police Plaza
New York, N.Y. 10038

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Defendants
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Plaintiff BRIAN K. ADAMS, by his attorney THE SANDERS FIRM, P.C., complaining of
defendants THE CITY OF NEW YORK; JESSICA S. TISCH, RYAN MEROLA, EDWARD A.
THOMPSON, JOSEPH A. DIBARTOLOMEO, RICHARD S. TAYLOR, KENNETH J.
HARSCH, JANE DOE 1, and MATTHEW MILLER, alleges as follows:

INTRODUCTION

Plaintiff BRIAN A. ADAMS is a Black former NYPD civilian executive who worked
without incident through the administrations of Police Commissioners James P. O'Neill, Dermot
F. Shea, Keechant L. Sewell, Edward A. Caban, and Thomas G. Donlon.

For years, the NYPD relied on plaintiff's credibility, relationships, and access to
communities of color, primarily Black and Hispanic communities, as well as youth
organizations, violence-interruption groups, elected officials, advocacy groups, families of crime
victims, and other stakeholders whose relationships with the NYPD were historically strained or
sensitive.

Plaintiff was elevated into an executive-level Community Affairs Bureau position equivalent to a Deputy Chief, assigned a department vehicle, placed in command of the Community Ambassador Unit, and entrusted with citywide responsibilities requiring discretion, mobility, executive access, and Department support.

That changed after defendant JESSICA S. TISCH became Police Commissioner. Plaintiff alleges that defendant TISCH's administration dismantled or restricted the community-facing work he had built, particularly work directed toward communities of color and other communities with strained relationships with police.

Plaintiff alleges that defendant TISCH, aided by defendant RYAN MEROLA, her Chief of Staff, favored a different internal power structure and treated Black executives perceived as connected to former Chief of Department Jeffrey B. Maddrey with heightened suspicion, reduced authority, diminished access, greater scrutiny, and less favorable institutional support.

Plaintiff does not allege that defendant MEROLA is a licensed attorney. Plaintiff alleges that MEROLA holds a Juris Doctor, presents himself within the Police Commissioner's Office as legally knowledgeable, regularly gives legal advice or legal-style guidance to defendant TISCH, and that defendant TISCH follows or relies upon that advice or guidance in personnel, access, resource, disciplinary, and executive-management decisions.

Plaintiff further alleges that defendants EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, JANE DOE 1, and MATTHEW MILLER acted as proxies or implementing actors for defendants TISCH and MEROLA by using Department authority, Internal Affairs Bureau processes, personnel mechanisms, investigative classifications, and disciplinary channels to carry out discriminatory and retaliatory actions against plaintiff.

Under defendant TISCH's administration, plaintiff's programs were disapproved or curtailed, his operational discretion was reduced, his executive access was removed, his vehicle, parking, operator, and PFD-related practices were challenged, and his role was narrowed after he was transferred back to Community Affairs.

Plaintiff alleges that defendants manufactured misconduct against him by selectively converting ordinary, authorized, tolerated, or correctable executive-resource and vehicle-related practices into a termination predicate.

By contrast, favored white and Jewish executives and employees, including defendant RICHARD S. TAYLOR, David Tzall, and Matthew J. Graziano, were allegedly treated with leniency and institutional protection despite serious alleged payroll, time-theft, private-business, or taxpayer-resource misconduct, and were not criminally prosecuted.

Plaintiff was terminated on June 24, 2026, shortly after an Internal Affairs Bureau interview, without being given a reason. The next day, information concerning his termination was published publicly in a manner that damaged his credibility, reputation, and future employment prospects.

This action seeks redress for defendants' discriminatory, retaliatory, selectively punitive, and aiding-and-abetting conduct under the New York State Human Rights Law, the New York City Human Rights Law, and all other applicable law.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to Article VI of the New York State Constitution, the New York State Human Rights Law, Executive Law § 290 et seq., the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq., and the common law of the State of New York.

2. This Court has personal jurisdiction over defendant THE CITY OF NEW YORK pursuant to CPLR §§ 301 and 302 because it is a municipal corporation organized and existing under the laws of the State of New York, conducts official business within the State of New York, exercises governmental authority within the State of New York, and committed acts or omissions complained of within the State of New York.

3. This Court has personal jurisdiction over defendants JESSICA S. TISCH, RYAN MEROLA, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, RICHARD S. TAYLOR, JOHN DOE 1, JOHN DOE 2, and JOHN DOE 3 pursuant to CPLR §§ 301 and 302 because, at all relevant times, they resided in, were domiciled in, were employed in, conducted business in, exercised official authority in, and/or committed acts or omissions complained of within the State of New York.

4. Venue is proper in Bronx County pursuant to CPLR §§ 503(a), 504(3), and 509.

5. Plaintiff BRIAN A. ADAMS resides in Nassau County and designates Bronx County as the place of trial.

6. Venue is proper in Bronx County because defendant THE CITY OF NEW YORK is a municipal defendant, plaintiff's claims arise from acts and omissions of New York City and New York City Police Department officials, executives, officers, employees, agents, and representatives, and a substantial part of the acts and omissions giving rise to plaintiff's claims occurred within the City of New York, including Bronx County.

7. Venue is further proper in Bronx County because plaintiff performed material citywide NYPD community-relations, Community Affairs Bureau, Community Ambassador Unit, community-response, violence-interruption, youth-outreach, and police-community trust-

building work affecting Bronx County residents, community groups, elected officials, youth organizations, and public-safety stakeholders.

8. Venue is also proper in Bronx County because defendants' discriminatory, retaliatory, selectively punitive, and aiding-and-abetting conduct affected plaintiff's executive duties, Department authority, community relationships, reputation, employment prospects, emotional well-being, and damages within Bronx County.

9. Although plaintiff resides in Nassau County and relevant Department decision-making also occurred in other counties within the City of New York, plaintiff properly designates Bronx County because the action is brought against the City of New York and NYPD officials, executives, officers, employees, agents, and representatives; the claims arise from citywide NYPD employment practices and official conduct; and substantial acts, omissions, consequences, and damages occurred in, affected, or were experienced in Bronx County.

PROCEDURAL REQUIREMENTS

10. Plaintiff BRIAN A. ADAMS has satisfied all conditions precedent to the commencement of this action, or such conditions have been waived, excused, satisfied by defendants' conduct, or are not required.

11. Plaintiff brings this action pursuant to the New York State Human Rights Law, Executive Law § 290 et seq., the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq., and applicable New York common law.

12. No notice of claim is required for plaintiff's claims brought pursuant to the New York State Human Rights Law, Executive Law § 290 et seq., or the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq.

13. No administrative exhaustion requirement bars plaintiff's claims under the New York State Human Rights Law or the New York City Human Rights Law.

14. To the extent any common-law claim asserted herein requires a notice of claim, plaintiff has complied with all applicable notice-of-claim requirements, or such requirements have been waived, excused, satisfied by defendants' conduct, rendered unnecessary, or are otherwise inapplicable.

15. To the extent defendants contend that any additional procedural requirement applies, such requirement has been satisfied, waived, excused, rendered unnecessary, or is inapplicable based upon the nature of the claims asserted herein.

16. This action has been commenced within the applicable statutes of limitation for all claims asserted herein.

PLAINTIFF

17. Plaintiff BRIAN A. ADAMS is a Black male and former civilian executive employee of the New York City Police Department.

18. Plaintiff resides in Nassau County, State of New York.

19. Plaintiff was hired by the New York City Police Department on or about August 13, 2018, as Citywide Community Coordinator.

20. Plaintiff later served in an executive-level position within the New York City Police Department's Community Affairs Bureau.

21. Plaintiff's executive-level position was equivalent in status, responsibility, and Department function to a Deputy Chief-level position.

22. During his NYPD employment, plaintiff performed citywide community-relations, youth-outreach, violence-interruption, community-response, and police-community trust-building work.

23. Plaintiff's work involved relationships with community organizations, youth groups, elected officials, advocacy groups, violence-interruption groups, families of crime victims, and communities whose relationships with the NYPD were historically strained or sensitive.

24. At all relevant times, plaintiff was an employee within the meaning of the New York State Human Rights Law and the New York City Human Rights Law.

25. Plaintiff is a member of protected classes within the meaning of the New York State Human Rights Law and the New York City Human Rights Law, including race and color.

DEFENDANTS

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

27. At all relevant times, defendant THE CITY OF NEW YORK owned, operated, managed, controlled, supervised, and/or was responsible for the New York City Police Department.

28. 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.

29. Defendant JESSICA S. TISCH is the Police Commissioner of the City of New York.

30. Defendant TISCH is sued individually and in her official capacity as Police Commissioner of the City of New York.

31. At all relevant times, defendant TISCH was acting under color of state and municipal law and within the scope of her employment, authority, and duties.

32. At all relevant times, defendant TISCH was the head of the New York City Police Department.

33. Pursuant to New York City Administrative Code § 14-115, defendant TISCH is charged with the government, administration, disposition, and discipline of the New York City Police Department and its members.

34. At all relevant times, defendant TISCH possessed supervisory, administrative, policymaking, and disciplinary authority over the New York City Police Department.

35. Defendant RYAN MEROLA was, at all relevant times, a senior member of the Police Commissioner's Office and Chief of Staff to defendant TISCH.

36. Defendant MEROLA is sued individually and in his official capacity.

37. At all relevant times, defendant MEROLA was acting under color of state and municipal law and within the scope of his employment, authority, and duties.

38. At all relevant times, defendant MEROLA possessed, exercised, and/or influenced executive-level authority within the Police Commissioner's Office, including authority or influence concerning personnel decisions, executive assignments, access determinations, Department resources, command-level approvals, and administrative decisions affecting NYPD executives and senior personnel.

39. Defendant MEROLA is not alleged to be a licensed attorney.

40. Defendant EDWARD A. THOMPSON was, at all relevant times, an official, executive, supervisor, officer, employee, agent, and/or representative of the New York City Police Department.

41. Defendant THOMPSON is sued individually and in his official capacity.

42. At all relevant times, defendant THOMPSON was acting under color of state and municipal law and within the scope of his employment, authority, and duties.

43. At all relevant times, defendant THOMPSON possessed, exercised, and/or participated in supervisory, investigative, disciplinary, administrative, personnel, and/or command authority within the New York City Police Department.

44. Defendant JOSEPH A. DIBARTOLOMEO was, at all relevant times, an official, executive, supervisor, officer, employee, agent, and/or representative of the New York City Police Department.

45. Defendant DIBARTOLOMEO is sued individually and in his official capacity.

46. At all relevant times, defendant DIBARTOLOMEO was acting under color of state and municipal law and within the scope of his employment, authority, and duties.

47. At all relevant times, defendant DIBARTOLOMEO possessed, exercised, and/or participated in supervisory, investigative, disciplinary, administrative, personnel, and/or command authority within the New York City Police Department, including authority connected to Internal Affairs Bureau matters.

48. Defendant RICHARD S. TAYLOR was, at all relevant times, an official, executive, supervisor, officer, employee, agent, and/or representative of the New York City Police Department.

49. Defendant TAYLOR is sued individually and in his official capacity.

50. At all relevant times, defendant TAYLOR was acting under color of state and municipal law and within the scope of his employment, authority, and duties.

51. At all relevant times, defendant TAYLOR possessed, exercised, and/or participated in supervisory, administrative, personnel, executive, command, and/or Department-resource authority within the New York City Police Department.

52. Defendant KENNETH J. HARSCH was, at all relevant times, a Deputy Inspector assigned to Group No. 1 of the Internal Affairs Bureau of the New York City Police Department.

53. Defendant HARSCH is sued individually and in his official capacity.

54. At all relevant times, defendant HARSCH was acting under color of state and municipal law and within the scope of his employment, authority, and duties.

55. At all relevant times, defendant HARSCH possessed, exercised, and/or participated in supervisory, investigative, disciplinary, administrative, and/or Internal Affairs Bureau authority within the New York City Police Department.

56. Defendant JANE DOE 1 was, at all relevant times, a female Hispanic Lieutenant assigned to Group No. 1 of the Internal Affairs Bureau of the New York City Police Department.

57. Defendant JANE DOE 1 is sued individually and in her official capacity.

58. At all relevant times, defendant JANE DOE 1 was acting under color of state and municipal law and within the scope of her employment, authority, and duties.

59. At all relevant times, defendant JANE DOE 1 possessed, exercised, and/or participated in investigative, disciplinary, administrative, supervisory, and/or Internal Affairs Bureau authority within the New York City Police Department.

60. Defendant MATTHEW MILLER was, at all relevant times, a Sergeant assigned to Group No. 1 of the Internal Affairs Bureau of the New York City Police Department.

61. Defendant MILLER is sued individually and in his official capacity.

62. At all relevant times, defendant MILLER was acting under color of state and municipal law and within the scope of his employment, authority, and duties.

63. At all relevant times, defendant MILLER possessed, exercised, and/or participated in investigative, disciplinary, administrative, supervisory, and/or Internal Affairs Bureau authority within the New York City Police Department.

64. At all relevant times, each individual defendant acted under color of state and municipal law, within the scope of employment, authority, duties, apparent authority, and/or agency, and as an official, employee, agent, or representative of defendant THE CITY OF NEW YORK and the New York City Police Department.

65. At all relevant times, each individual defendant was an employer, supervisor, manager, agent, aider and abettor, and/or participant within the meaning of the New York State Human Rights Law and the New York City Human Rights Law.

BACKGROUND

A. Plaintiff's Hiring and Citywide Community-Relations Mission

66. On or about August 13, 2018, plaintiff BRIAN A. ADAMS was hired by the New York City Police Department during the administration of former Police Commissioner James P. O'Neill.

67. Plaintiff was hired as Citywide Community Coordinator.

68. Plaintiff's mission was to help mend relationships between the NYPD and youth throughout the City of New York.

69. Plaintiff was also tasked with building relationships between the NYPD and community organizations, advocacy groups, youth organizations, violence-interruption groups,

elected officials, and other stakeholders who had reservations about partnering with the Department.

70. Plaintiff's work focused heavily on communities of color, primarily Black and Hispanic communities, and other communities whose relationships with the NYPD were historically strained, sensitive, or distrustful.

71. Plaintiff's role required credibility, access, discretion, mobility, community trust, and the ability to communicate with people and organizations that did not always trust the NYPD.

72. Plaintiff performed this work without incident through the administrations of Police Commissioners James P. O'Neill, Dermot F. Shea, Keechant L. Sewell, Edward A. Caban, and Thomas G. Donlon.

73. During those administrations, plaintiff's community-facing work was accepted, relied upon, expanded, and treated as valuable to the Department.

74. Plaintiff's work was not limited to ceremonial appearances or ordinary community outreach.

75. Plaintiff was used by the Department as a citywide relationship-builder, problem-solver, and point of contact during sensitive community-facing matters.

76. Plaintiff's effectiveness depended on the Department's willingness to support his access to communities, permit him to maintain relationships, and provide him with the operational tools necessary to perform his citywide duties.

B. Plaintiff's Community Programs and Relationship-Building Work

77. In or about December 2018, plaintiff created the New Year's Eve Youth Celebration event in partnership with the New York City Department of Education.

78. Through that program, approximately fifty students with a B average or higher were selected and brought to Times Square to experience the New Year's Eve celebration.

79. The purpose of the program was to reward students for their positive role in improving public safety in their communities and to strengthen relationships between youth, families, communities, and the NYPD.

80. The New Year's Eve Youth Celebration was successful as a relationship-building program.

81. The program continued annually from 2018 through 2024.

82. In or about 2018, plaintiff also created an appreciation event at the Thanksgiving Day Parade for families of crime victims.

83. That program provided families affected by crime with recognition, support, and access to a significant City event while helping the Department strengthen relationships with victims' families and affected communities.

84. In or about 2018, during the Department trial of Police Officer Daniel Pantaleo and the related community tensions, plaintiff served as a liaison between the family of Eric Garner and the NYPD.

85. Plaintiff's role required trust, credibility, restraint, and the ability to communicate with both Department leadership and a family whose relationship with the NYPD was deeply sensitive.

86. In or about 2019, Eric Garner's mother, Gwen Carr, informed then-Police Commissioner Dermot F. Shea that plaintiff was an asset to the NYPD.

87. In or about May 2020, while plaintiff was working under the Community Affairs Bureau and then-Deputy Commissioner Chauncey Parker, the George Floyd protests and unrest occurred across New York City.

88. During that period, plaintiff used his relationships with activists, community leaders, advocacy groups, and community organizations to help reduce tensions between the NYPD and communities throughout the City.

89. Plaintiff personally assisted then-Police Commissioner Shea and Deputy Commissioner Parker in meeting with more than 130 organizations and groups in connection with the police-reform work mandated by then-Governor Andrew Cuomo.

90. Plaintiff also developed a working relationship with members of the Floyd family, including Terrence Floyd, to improve communication between the Department and affected communities.

91. In or about 2020, plaintiff partnered with the New York Daily News and the New York Jets to bring NYPD Cadets and Explorers to Jets Alumni community-appreciation receptions twice each year.

92. Department buses were approved through channels for that program through 2024.

93. In or about October 2021, plaintiff partnered with Barclays Center's community office to provide tickets, experiences, and relationship-building opportunities for youth groups and officers.

94. The Barclays Center partnership was designed to strengthen relationships between the NYPD, youth, officers, community stakeholders, and organizations throughout the City.

95. Plaintiff also served as a department point person for community management and violence-interruption groups throughout the City.

96. Plaintiff worked with community-based violence-interruption stakeholders, local-area politicians, youth organizations, and the Department of Youth and Community Development.

97. Plaintiff's community-relations work was citywide in scope and focused on practical relationship-building, de-escalation, trust-building, and public-safety communication.

98. Plaintiff's work was especially important in communities of color, primarily Black and Hispanic communities, where police-community relationships were historically strained, fragile, or distrustful.

99. From 2018 through 2024, the Department repeatedly accepted, supported, and benefited from plaintiff's programs, relationships, and community credibility.

100. Plaintiff's programs and relationships became part of the Department's broader community-facing public-safety strategy.

C. Plaintiff's Executive Promotion, Community Ambassador Unit, and Deputy Chief-Level Responsibilities

101. In or about September 2021, then-Police Commissioner Dermot F. Shea promoted plaintiff into the Department's executive ranks as a director.

102. Plaintiff's Director position was equivalent in status, responsibility, and Department function to a Deputy Chief-level position.

103. Upon plaintiff's elevation into the executive ranks, the Department assigned plaintiff a Department vehicle.

104. The Department also created the Community Ambassador Unit and placed plaintiff in command of that unit.

105. Plaintiff served as the commanding officer of the Community Ambassador Unit.

106. The Community Ambassador Unit's mission was to foster, develop, and expand relationships between the NYPD and communities throughout the City of New York.

107. The Community Ambassador Unit was not created for ceremonial community outreach.

108. The unit was designed to strengthen the Department's relationship with the target groups most vital to the police-community dynamic, including communities of color, primarily Black and Hispanic communities, youth organizations, violence-interruption groups, community-based organizations, elected officials, advocacy groups, families affected by crime, and residents whose relationships with the NYPD were historically strained, sensitive, or distrustful.

109. Plaintiff's executive function required him to maintain credibility with groups and communities that could not be reached effectively through ordinary police command channels.

110. Plaintiff's role required him to communicate with communities that often viewed the NYPD with skepticism because of historical over-policing, under-protection, excessive-force concerns, discriminatory enforcement, and distrust arising from prior police-community conflict.

111. Plaintiff's work was particularly important because the Department needed trusted intermediaries who could speak with credibility to communities where ordinary uniformed presence could escalate tension rather than resolve it.

112. Plaintiff's command of the Community Ambassador Unit therefore served an operational public-safety purpose.

113. Plaintiff and his unit were expected to help preserve communication, reduce tension, support de-escalation, and maintain public-safety relationships before, during, and after sensitive police-community events.

114. The Community Ambassador Unit reflected the diversity of the communities it served.

115. The unit included women, men, Jewish personnel, Catholic personnel, African-American personnel, and detectives assigned to support the unit's work.

116. Plaintiff's executive responsibilities were not limited to one precinct, bureau, or geographic command.

117. Plaintiff's responsibilities were citywide in scope.

118. Plaintiff was expected to communicate with community groups, elected officials, youth organizations, violence-interruption stakeholders, Department executives, and police commanders regarding sensitive public-safety and community-relations matters.

119. Plaintiff's executive role required discretion, mobility, access, Department resources, and the ability to respond to community concerns across the five boroughs.

120. Plaintiff also developed and maintained a strong working relationship with the Nassau County Explorers and Nassau County Police Commissioner Patrick Ryder.

121. Those relationships assisted plaintiff's Department work, including youth outreach, law-enforcement partnership, community programming, and relationship-building involving NYPD-affiliated youth and explorer programs.

122. In or about April 2022, the Community Ambassador Unit was transferred to work under the Chief of Patrol.

123. The transfer occurred at the request of then-Chief John M. Chell.

124. Chief Chell wanted to create and develop the Community Link program, which later became associated with the Department's Quality of Life Division.

125. Chief Chell believed plaintiff would be an asset to that work because plaintiff had relationships with the very communities whose cooperation, trust, and communication were essential to the Department's quality-of-life and community-response operations.

126. After the transfer, plaintiff worked alongside then-Inspector William E. Glynn and then-Captain Maurice W. Williams.

127. Plaintiff's Ambassador team attended operations alongside uniformed members of the service.

128. The purpose of plaintiff's presence at those operations was to assist with communication, de-escalation, and community tension if issues arose.

129. Plaintiff also served as a department point person for community-management and violence-interruption groups throughout the City.

130. Plaintiff further served as a department point person for matters involving the Department of Youth and Community Development.

131. Plaintiff was introduced to the Patrol Services Bureau team in a manner that identified his rank, position, and role so that cooperation would be provided when needed.

132. Plaintiff's executive function required the Department to treat him as a senior citywide community-relations executive whose work was tied directly to public safety, community trust, and police legitimacy.

133. Plaintiff's executive function also required operational support, including vehicle access, field mobility, executive access, and appropriate staffing support.

134. In or about May 2024, Chief Chell authorized plaintiff to take his department vehicle home when necessary.

135. Chief Chell authorized that practice because plaintiff frequently worked late hours and was required to respond to quality-of-life operations, community unrest, police-involved shootings, and other sensitive incidents across the five boroughs.

136. Plaintiff's Deputy Chief-equivalent status, citywide responsibilities, Department vehicle, command of the Community Ambassador Unit, and direct involvement in sensitive community-response matters reflected the executive nature of his NYPD position.

137. Plaintiff's position also reflected the Department's recognition that police-community trust in primarily Black and Hispanic communities required sustained relationships, not episodic public relations.

D. Defendant Tisch Shifts the Department Away from Plaintiff's Black and Hispanic Community-Centered Work

138. Plaintiff performed his executive-level community-relations duties without incident through the administrations of Police Commissioners James P. O'Neill, Dermot F. Shea, Keechant L. Sewell, Edward A. Caban, and Thomas G. Donlon.

139. Plaintiff's work was accepted, relied upon, expanded, and supported during those administrations.

140. That changed after defendant JESSICA S. TISCH became Police Commissioner.

141. Under defendant TISCH's administration, the Department began dismantling, restricting, disapproving, or devaluing the community-facing programs, relationships, and operational practices plaintiff had built and maintained for years.

142. The programs and relationships affected by defendant TISCH's administration primarily served communities of color, including Black and Hispanic communities, youth organizations, NYPD Cadets, NYPD Explorers, violence-interruption stakeholders, community-

based organizations, elected officials, families of crime victims, and other groups central to the police-community dynamic.

143. Plaintiff alleges that these programs mattered because Black and Hispanic communities have historically had among the most strained, sensitive, and distrustful relationships with the NYPD.

144. Plaintiff further alleges that NYPD Cadet and Explorer programming was especially important because those programs were heavily populated by young people from communities of color and were used to build early trust, mentorship, public-safety awareness, and positive relationships between the NYPD and youth.

145. Plaintiff alleges that defendant TISCH's administration devalued plaintiff's work because it was rooted in Black and Hispanic communities and because plaintiff's executive credibility came from relationships with community's defendant TISCH did not prioritize in the same manner.

146. Plaintiff further alleges that defendant TISCH favored politically centrist programs, affluent communities, Jewish communities, internally favored employees, and Tisch-aligned constituencies while restricting plaintiff's work with Black, Hispanic, youth, Cadet, Explorer, violence-interruption, and community-based stakeholders.

147. Plaintiff's New Year's Eve Youth Celebration program operated successfully from 2018 through 2024.

148. The New Year's Eve Youth Celebration program was created in partnership with the New York City Department of Education.

149. Through that program, approximately fifty students with a B average or higher were selected and brought to Times Square to experience the New Year's Eve celebration.

150. The program was designed to reward students for their positive role in improving public safety in their communities and to build trust between youth, families, communities, and the NYPD.

151. Under defendant TISCH's administration, the New Year's Eve Youth Celebration program was cancelled or disapproved.

152. Plaintiff's Thanksgiving Day Parade appreciation event for families of crime victims had also operated as part of plaintiff's community-relations work.

153. That program provided support, recognition, and access to families affected by crime while strengthening relationships between the NYPD, victims' families, and affected communities.

154. Under defendant TISCH's administration, plaintiff was informed that no one could set up private viewing areas.

155. Plaintiff alleges that, despite that instruction, defendant TISCH and favored Caucasian executives were permitted to bring friends and family members to privileged viewing opportunities.

156. Plaintiff's New York Jets community-appreciation program had operated with Department-approved buses through 2024.

157. That program primarily involved NYPD Cadets and Explorers and was part of plaintiff's broader strategy to build trust between the NYPD and young people from communities of color.

158. Under defendant TISCH's administration, Department resources for the Jets program were disapproved.

159. As a result, Cadets had to make their own way to the event in 2025.

160. Plaintiff's Barclays Center partnership had provided tickets, experiences, and relationship-building opportunities for youth groups and officers.

161. That partnership was also part of plaintiff's effort to create practical, constructive, and trust-building opportunities between the NYPD and youth from communities where police legitimacy could not be assumed.

162. Under defendant TISCH's administration, a department-wide Finest message restricted tickets, gifts, and similar community-facing opportunities.

163. Plaintiff alleges that defendant TISCH's restrictions interfered with tools plaintiff had used for years to build trust, reward youth, support community engagement, and strengthen relationships between the NYPD and communities with strained police relationships.

164. Plaintiff also had served as a department point person for CMS groups, violence-interruption stakeholders, youth organizations, community-based organizations, and local elected officials throughout the City.

165. Plaintiff's CMS and violence-interruption relationships were central to public-safety communication in Black and Hispanic communities.

166. Under defendant TISCH's administration, plaintiff was later instructed to pause working with CMS groups until the Police Commissioner gave approval.

167. The instruction disrupted community relationships plaintiff had developed over approximately four years.

168. The instruction also caused community groups and stakeholders to question plaintiff's accessibility, authority, and reliability as a department point person.

169. Plaintiff alleges that defendant TISCH's administration did not merely change policy.

170. Plaintiff alleges that defendant TISCH's administration selectively dismantled plaintiff's Black and Hispanic community-centered work while favoring politically safer, more affluent, more centrist, and Jewish-centered institutional relationships and programs.

171. Plaintiff further alleges that this shift reduced plaintiff's authority, weakened his credibility, and impaired his ability to serve as the Department's trusted executive contact in communities where trust had been built over years.

172. Plaintiff's ability to respond to community unrest was also restricted under defendant TISCH's administration.

173. Before defendant TISCH's administration, plaintiff had been expected to respond to quality-of-life operations, community unrest, police-involved shootings, and other sensitive matters across the five boroughs.

174. Under defendant TISCH's administration, plaintiff was instructed not to appear at potential community-unrest situations unless specifically directed to do so.

175. That restriction materially changed plaintiff's executive function.

176. The restriction also damaged plaintiff's credibility with community stakeholders who had become accustomed to plaintiff serving as a department point person on the ground during delicate situations.

177. Plaintiff alleges that these changes were not isolated administrative decisions.

178. Plaintiff alleges that these changes reflected a broader shift under defendant TISCH away from plaintiff's work with Black and Hispanic communities, youth, Cadets, Explorers, violence-interruption stakeholders, families of crime victims, and communities with strained police relationships, and toward favored executives, favored communities, favored internal actors, and favored institutional relationships.

179. Plaintiff further alleges that these changes formed part of the foundation for defendant TISCH's and defendant MEROLA's later manufactured-misconduct narrative against plaintiff.

E. Defendant Tisch and Defendant Merola Selectively Dismantle Plaintiff's Deputy Chief-Equivalent Executive Authority

180. After defendant TISCH became Police Commissioner, plaintiff's executive authority, operational support, Department access, and practical ability to perform his Deputy Chief-equivalent citywide role were progressively reduced.

181. These reductions were not isolated administrative changes.

182. Plaintiff alleges that defendant TISCH and defendant MEROLA selectively dismantled the authority of a Black executive whose work was rooted in Black and Hispanic communities, while similarly situated or favored white and Jewish executives, political insiders, and employees aligned with defendant TISCH's preferred internal structure were protected, supported, advanced, or treated with greater institutional deference.

183. Plaintiff further alleges that defendant TISCH and defendant MEROLA treated Black executives perceived as politically or professionally connected to former Chief of Department Jeffrey B. Maddrey with heightened suspicion, diminished trust, reduced authority, and increased scrutiny.

184. Plaintiff's Deputy Chief-equivalent executive role required mobility, executive access, operator support, field support, staffing, discretion, and Department resources.

185. Defendant TISCH and defendant MEROLA knew, or should have known, that plaintiff could not effectively perform citywide community-response, violence-interruption, youth-outreach, Cadet, Explorer, and police-community trust-building work without those tools.

186. Nevertheless, defendant TISCH and defendant MEROLA began restricting the tools plaintiff needed to perform the very work the Department had previously relied upon him to perform.

187. In or about April 2025, NYPD executives were directed to submit Department forms requesting vehicle-category status.

188. Plaintiff submitted a request for category 2 vehicle status.

189. Plaintiff never received a clear approval or disapproval of his category 2 vehicle-status request.

190. Plaintiff alleges that the failure to approve or disapprove his category 2 vehicle-status request left him in an intentionally vulnerable position.

191. Plaintiff further alleges that defendant TISCH and defendant MEROLA later used the unresolved vehicle-status issue, and the ambiguity surrounding it, as part of a manufactured misconduct narrative against him.

192. At or about the same time, plaintiff was instructed by Deputy Chief Theodore E. Federoff that plaintiff's operator could no longer meet plaintiff at the 105 Annex and ride into the office with him unless there was a scheduled meeting or event in the field.

193. Plaintiff was not told that he could no longer sign PFD at the 105 Annex.

194. Defendant TISCH and defendant MEROLA therefore altered plaintiff's operator and vehicle practices without clearly informing him that his PFD practice at the 105 Annex was prohibited.

195. Plaintiff alleges that defendant TISCH and defendant MEROLA later used the resulting ambiguity as part of the manufactured misconduct theory.

196. The restriction impaired plaintiff's ability to move efficiently between his assigned reporting location, field responsibilities, community events, youth-outreach responsibilities, and citywide operational demands.

197. The restriction also treated plaintiff differently from favored executives whose duties required mobility, field response, operational access, and Department resources, but who were not stripped of comparable support in the same manner.

198. In or about September 2025, plaintiff began experiencing insubordination from Ambassadors assigned to his unit.

199. Plaintiff made verbal requests to Chief of Patrol Philip P. Rivera for a sergeant to provide better structure, supervision, and support.

200. Plaintiff's request for additional personnel was not approved.

201. Plaintiff also requested that the Ambassadors be separated from under his direction because the lack of structure was undermining the effectiveness of the unit.

202. That request was not approved.

203. Plaintiff alleges that defendant MEROLA did not approve the requested personnel movement.

204. Defendant TISCH and defendant MEROLA's refusal to approve personnel support weakened plaintiff's ability to command the Community Ambassador Unit.

205. Their refusal also damaged plaintiff's credibility with the community because plaintiff remained responsible for community-facing outcomes while defendants withheld the structure, staffing, and command support necessary to perform the work effectively.

206. Plaintiff alleges that this was part of the selective dismantling of Black executive authority: plaintiff retained responsibility but lost the tools, staff, discretion, and institutional backing necessary to succeed.

207. During Labor Day weekend 2025, from approximately August 29, 2025 through September 1, 2025, plaintiff's operator, Detective Dartray I. Belk, was on vacation and unavailable to work.

208. During that weekend, plaintiff remained the executive responsible for communicating with CMS groups, local-area politicians, youth organizations, violence-interruption stakeholders, and community members.

209. Plaintiff requested a replacement driver or uniformed member of the service.

210. Plaintiff was informed that no uniformed member of the service was available.

211. Plaintiff nevertheless worked all four days and nights without a uniformed member of the service assigned to him.

212. Plaintiff had previously been told that he should not be in the field alone.

213. Every other executive working the detail, including executives of lower rank than plaintiff, had an operator assigned.

214. Plaintiff was subjected to hostile and sometimes violent crowds during those assignments.

215. Defendant TISCH and defendant MEROLA's refusal to ensure comparable operator or uniformed-member support impaired plaintiff's safety, mobility, authority, and effectiveness.

216. Plaintiff alleges that similarly situated or less senior non-Black executives were not left exposed in the field without comparable support.

217. On Halloween 2024, plaintiff's operator, Detective Belk, was out with a leg injury.

218. Plaintiff was designated to work the Halloween Parade and assist with crowd issues if needed.

219. Plaintiff was again denied a dedicated uniformed member of the service.

220. Plaintiff requested assistance from Lieutenant Patrick Gordon's rapid-response unit to obtain a uniformed member of the service on loan for the evening.

221. No other executive was out working that parade alone.

222. These incidents reflected a broader pattern in which plaintiff was expected to perform executive-level field and community-response duties without the support routinely afforded to other executives.

223. Plaintiff alleges that defendant TISCH and defendant MEROLA used staffing, operator, vehicle, PFD, personnel, and field-support restrictions to reduce plaintiff's effectiveness while preserving, protecting, or expanding support for favored white and Jewish executives, political insiders, and employees aligned with defendant TISCH and defendant MEROLA.

224. Plaintiff further alleges that defendant TISCH and defendant MEROLA did not impose comparable dismantling, restriction, isolation, or operational deprivation upon favored white and Jewish executives, political insiders, or employees aligned with defendant TISCH's preferred internal structure.

225. Plaintiff alleges that defendant TISCH and defendant MEROLA's conduct had a disparate impact on plaintiff as a Black executive because it deprived him of the authority, support, access, and credibility necessary to perform a role built around Black and Hispanic

community trust, while preserving institutional advantage for favored non-Black executives and employees.

226. Plaintiff further alleges that defendant TISCH and defendant MEROLA's selective dismantling of his authority created the conditions for their later manufactured-misconduct narrative, Internal Affairs Bureau action, termination, and public stigmatization.

F. Defendant Tisch and Defendant Merola Transfer, Contain, and Marginalize Plaintiff Inside Community Affairs

228. In or about December 2025, plaintiff was informed that defendant TISCH directed plaintiff and the Community Ambassadors to be transferred back to the Community Affairs Bureau.

229. Plaintiff was told that defendant TISCH did not believe there should be a community office operating under the Chief of Patrol.

230. The transfer removed plaintiff from the operational structure where his Deputy Chief-equivalent citywide community-response function had been used in connection with Patrol, quality-of-life operations, community-sensitive deployments, violence-interruption work, and field response.

231. Plaintiff alleges that the transfer was not a neutral reorganization.

232. Plaintiff alleges that defendant TISCH and defendant MEROLA used the transfer to contain plaintiff, reduce his operational authority, and remove him from the Patrol structure where his citywide community-facing work had practical public-safety impact.

233. Plaintiff further alleges that the transfer was part of defendant TISCH's and defendant MEROLA's broader effort to dismantle plaintiff's Black and Hispanic community-centered executive function while preserving or expanding authority, access, and opportunity for

avored white and Jewish executives, political insiders, and employees aligned with defendant TISCH's preferred internal structure.

234. When plaintiff returned to the Community Affairs Bureau in or about January 2026 under Deputy Commissioner Alden Foster, plaintiff was not given clear direction concerning his role.

235. Plaintiff was not properly introduced to Community Affairs Bureau supervisors or members of the service as the latest executive on the team.

236. The lack of a proper introduction impaired plaintiff's day-to-day interactions with Community Affairs Bureau subordinates.

237. The lack of a proper introduction also diminished plaintiff's institutional standing and signaled that plaintiff no longer possessed the same executive authority that had attached to his prior citywide command function.

238. In or about January 2026, plaintiff was the only executive not allowed the option to select a home command.

239. Plaintiff was informed that he was required to report to 90 Church Street.

240. That reporting requirement created practical difficulty because street parking near 90 Church Street was limited and plaintiff often had to spend substantial time looking for parking.

241. Plaintiff alleges that forcing him to report to 90 Church Street; while denying him the same flexibility afforded to other executives, further restricted his mobility, reduced his efficiency, and weakened his ability to perform citywide community-facing work.

242. In or about January 2026, plaintiff was informed that defendant RICHARD S. TAYLOR would be his direct report.

243. Plaintiff alleges that the decision to place him under defendant TAYLOR was not neutral.

244. Defendant TAYLOR had previously accused plaintiff publicly on social media of speaking against him to Reverend Kevin McCall.

245. Plaintiff was aware of defendant TAYLOR's accusation.

246. Plaintiff reasonably believed that reporting to defendant TAYLOR created a risk of retaliation, hostility, and unfair treatment.

247. Plaintiff expressed concerns about retaliation from defendant TAYLOR.

248. After plaintiff expressed those concerns, the Department changed plaintiff's reporting line and directed plaintiff to report to Assistant Commissioner of the Community Affairs Bureau Fred Krizeman.

249. Plaintiff alleges that this change was not neutral.

250. Plaintiff alleges that Krizeman was Jewish, aligned with defendant TISCH's preferred internal structure, and functioned as another Tisch insider placed in plaintiff's chain of command after plaintiff objected to reporting to defendant TAYLOR.

251. Plaintiff alleges that defendants did not restore plaintiff's independent executive authority, reinstate his citywide command function, return his prior operational discretion, or place him under a neutral executive.

252. Instead, defendants moved plaintiff from one favored executive structure to another while continuing to diminish his authority, restrict his access, narrow his role, and isolate him from meaningful executive support.

253. Plaintiff alleges that the reassignment to Krizeman further reflected defendant TISCH's and defendant MEROLA's selective dismantling of Black executive authority and their

preferential use of favored Jewish executives and Tisch-aligned insiders to control, contain, and marginalize plaintiff.

254. Upon plaintiff's return to the Community Affairs Bureau, two civilians were assigned under plaintiff without consultation.

255. At the time they were assigned under plaintiff, both civilians were under Department investigation.

256. Plaintiff alleges that the assignment of those civilians under him, without consultation, further undermined his executive authority and exposed him to additional operational and supervisory risk.

257. After plaintiff was relieved of his commanding-officer position over the Community Ambassador Unit, plaintiff was given a less favorable assignment.

258. Plaintiff was told to focus on concerns within NYCHA.

259. Plaintiff's prior role had been citywide and substantially broader than NYCHA-related work.

260. Plaintiff had previously served as a department point person for communities, organizations, elected officials, youth groups, Cadets, Explorers, violence-interruption stakeholders, families, and public-safety partners across the five boroughs.

261. Plaintiff alleges that narrowing his role to NYCHA-related concerns reduced his executive authority and materially changed the scope of his Department responsibilities.

262. Plaintiff further alleges that the Department's decision reflected a racially stereotyped assumption that a Black executive should be limited primarily to handling minority communities, rather than being treated as a citywide executive with broad Department authority.

263. Plaintiff alleges that defendant TISCH and defendant MEROLA demoted him in function, authority, and institutional standing even if they did not formally change his title.

264. Plaintiff alleges that defendant TISCH's administration moved plaintiff from commanding a citywide community-relations unit to reporting within a layered Community Affairs Bureau structure.

265. Plaintiff alleges that, after the transfer, several executives and supervisors were positioned above him in the Community Affairs Bureau hierarchy.

266. Those executives included Deputy Commissioner Foster, Assistant Chief Victoria C. Perry, Assistant Commissioner Krizeman, Inspector Gareth D. Kentish, Inspector Khandakar Abdullah, and defendant TAYLOR.

267. Plaintiff alleges that this structure pushed him down in the executive hierarchy and reduced the authority that had previously attached to his Deputy Chief-equivalent citywide role.

268. Plaintiff further alleges that defendant TISCH and defendant MEROLA used the transfer, reporting-line changes, assignment changes, and narrowing of his duties to strip him of meaningful executive authority while leaving him exposed to blame for diminished community outcomes.

269. In or about February 2026, plaintiff received telephone calls from civilians Robert Rice and Frank Chiaramonte informing him that they were being moved from under his supervision.

270. Plaintiff was blindsided by those calls.

271. No Community Affairs Bureau executive informed plaintiff in advance that Rice and Chiaramonte were being moved from under him.

272. No Community Affairs Bureau executive explained the reason for the change to plaintiff before or after it occurred.

273. Plaintiff alleges that the movement of subordinates without notice to him further undermined his authority and signaled that he no longer had meaningful control over his own assignment or personnel.

274. Plaintiff further alleges that these personnel movements were consistent with defendant MEROLA's influence over personnel movement and defendant TISCH's broader dismantling of plaintiff's executive authority.

275. In or about February 2026, plaintiff was instructed to pause working with CMS groups until the Police Commissioner gave approval.

276. The instruction to pause CMS work disrupted plaintiff's community relationships and the work he had developed over approximately four years.

277. CMS groups and community stakeholders questioned plaintiff's reduced accessibility.

278. Plaintiff's credibility with community groups was damaged because he could no longer communicate, respond, or operate with the same authority and reliability the Department had previously allowed him to maintain.

279. Plaintiff alleges that restricting his CMS work was especially damaging because CMS groups were central to violence interruption, community trust, youth outreach, and public-safety communication in primarily Black and Hispanic communities.

280. Plaintiff further alleges that defendant TISCH and defendant MEROLA restricted plaintiff's CMS work while favoring politically safer, more affluent, more centrist, Jewish-centered, and Tisch-aligned programming and relationships.

281. Plaintiff alleges that defendant TISCH and defendant MEROLA's actions during this period were designed to make plaintiff less effective, less visible, less accessible, and less valuable to the communities and stakeholders who had previously viewed him as a trusted Department contact.

282. Plaintiff alleges that defendant TISCH and defendant MEROLA's conduct further isolated him from executive authority, damaged his institutional standing, and laid additional groundwork for their later manufactured-misconduct narrative.

G. Defendant Tisch and Defendant Merola Strip Plaintiff's Executive Access, Parking, Vehicle Practices, and Remaining Operational Tools

283. After defendant TISCH and defendant MEROLA transferred, contained, and marginalized plaintiff inside the Community Affairs Bureau, they continued stripping plaintiff of the remaining executive tools necessary to perform his Deputy Chief-equivalent citywide role.

284. Plaintiff alleges that defendant TISCH and defendant MEROLA did not merely reduce plaintiff's assignment on paper.

285. Plaintiff alleges that defendant TISCH and defendant MEROLA removed or restricted the access, parking, vehicle practices, operator practices, reporting flexibility, and executive privileges that made plaintiff's citywide community-relations role operationally possible.

286. In or about March 2026, plaintiff's access to the executive floors inside One Police Plaza was removed.

287. Plaintiff received no advance notice that his executive-floor access would be removed.

288. Plaintiff received no written explanation for the removal of his executive-floor access.

289. Plaintiff was informed that defendant MEROLA removed plaintiff from the executive-floor access list.

290. Plaintiff had possessed executive-floor access since his date of hire in or about August 2018.

291. Plaintiff's executive-floor access was consistent with his department role, executive standing, Deputy Chief-equivalent responsibilities, citywide duties, and need to communicate with senior Department personnel.

292. Plaintiff alleges that defendant MEROLA removed, directed the removal of, caused the removal of, or participated in removing plaintiff's executive-floor access.

293. Plaintiff further alleges that defendant TISCH knew of, approved, ratified, permitted, or failed to correct the removal of plaintiff's executive-floor access.

294. The removal of plaintiff's executive-floor access materially diminished his institutional standing.

295. The removal also signaled to Department executives, supervisors, subordinates, and members of the service that plaintiff no longer held the same authority, access, or executive status he had previously possessed.

296. Plaintiff alleges that the removal of his executive-floor access was not neutral.

297. Plaintiff alleges that the removal was part of defendant TISCH's and defendant MEROLA's broader effort to isolate plaintiff, reduce his authority, and mark him internally as disfavored.

298. Plaintiff further alleges that favored white and Jewish executives, political insiders, and employees aligned with defendant TISCH and defendant MEROLA were not subjected to the same removal of access, authority, support, and institutional standing.

299. In or about April 2026, several community members met with defendant TISCH.

300. During that meeting, community members informed defendant TISCH that plaintiff was the best contact for the community inside the NYPD.

301. Plaintiff alleges that defendant TISCH was therefore on actual notice that plaintiff remained a trusted and effective Department contact for community stakeholders.

302. Plaintiff further alleges that defendant TISCH was on actual notice that removing, restricting, or marginalizing plaintiff would harm the Department's relationship with the community's plaintiff served.

303. Despite that notice, defendant TISCH, aided by defendant MEROLA, continued restricting plaintiff's access, operational support, and ability to perform his citywide community-relations function.

304. In or about May 2026, Deputy Commissioner Alden Foster informed plaintiff that plaintiff could not sign PFD at the location where the Department vehicle was stored.

305. Plaintiff had not previously been clearly instructed that he could not sign PFD at that location.

306. Plaintiff had previously been required to report to 90 Church Street, where parking was limited and operational mobility was impaired.

307. Plaintiff's Department vehicle was stored at or near the 105 Annex.

308. Plaintiff alleges that requiring him to report to 90 Church Street while limiting his ability to sign PFD at the vehicle-storage location created unnecessary delay, confusion, and operational burden.

309. Plaintiff alleges that defendant TISCH and defendant MEROLA used, adopted, ratified, or permitted the PFD issue to create a disciplinary predicate after failing to clearly define, communicate, or resolve the rule they later claimed plaintiff violated.

310. Plaintiff further alleges that the PFD issue was part of defendant TISCH's and defendant MEROLA's manufactured-misconduct narrative.

311. In or about May 2026, plaintiff's operator, Detective Belk, was informed by Detective Wyman Chin that the Police Commissioner's Office would be taking plaintiff's reserved parking spot inside the Executive Garage.

312. No executive notified plaintiff directly that his reserved parking spot was being taken.

313. Plaintiff's parking spot inside One Police Plaza's Executive Garage had been designated to him in or about Summer 2022.

314. The parking spot was important because plaintiff was being forced to report to 90 Church Street, where street parking was difficult and time-consuming.

315. The removal of plaintiff's Executive Garage parking further impaired plaintiff's mobility, access, efficiency, and ability to perform his duties.

316. Plaintiff alleges that the removal of his Executive Garage parking was not an isolated administrative act.

317. Plaintiff alleges that defendant TISCH and defendant MEROLA used parking, vehicle, PFD, operator, access, and reporting-location restrictions together to frustrate his ability to function as a Deputy Chief-equivalent citywide executive.

318. Plaintiff further alleges that defendant TISCH and defendant MEROLA then used the predictable consequences of those restrictions as part of the alleged misconduct narrative against him.

319. Plaintiff alleges that defendant TISCH and defendant MEROLA were not applying neutral administrative rules.

320. Plaintiff alleges that defendant TISCH and defendant MEROLA selectively restricted a Black executive's operational support while preserving, protecting, or expanding support for favored white and Jewish executives, political insiders, and Tisch-aligned employees.

321. Plaintiff alleges that defendant TISCH and defendant MEROLA created a trap.

322. Plaintiff was left with citywide executive responsibilities.

323. Plaintiff was stripped of the tools needed to perform those responsibilities.

324. Plaintiff was denied clear guidance concerning vehicle, PFD, reporting-location, parking, and operator practices.

325. Plaintiff was then exposed to scrutiny for attempting to continue performing the work the Department had assigned to him.

326. Plaintiff further alleges that the removal of executive-floor access, the restriction of PFD practices, the removal of Executive Garage parking, the unresolved category 2 vehicle issue, and the continued vehicle-related ambiguity were used by defendant TISCH and defendant MEROLA to prepare or support the later Internal Affairs Bureau action.

327. Plaintiff alleges that defendant TISCH and defendant MEROLA designed, approved, ratified, or permitted these restrictions to weaken plaintiff's authority, impair his community relationships, isolate him from senior Department access, and manufacture a basis to remove him from the Department.

328. Plaintiff alleges that these restrictions were part of the same discriminatory and retaliatory course of conduct through which defendant TISCH and defendant MEROLA selectively dismantled plaintiff's Black executive authority while protecting and favoring white and Jewish executives, political insiders, and employees aligned with their preferred internal structure.

H. Defendant Tisch and Defendant Merola Use Internal Affairs Bureau Proxies to Convert Their Manufactured Trap into Misconduct

329. After defendant TISCH and defendant MEROLA restricted plaintiff's authority, removed his executive access, limited his operational support, created ambiguity concerning his vehicle and PFD practices, and impaired his ability to perform his Deputy Chief-equivalent citywide executive function, plaintiff was escalated into an Internal Affairs Bureau process.

330. Plaintiff alleges that the Internal Affairs Bureau process was not neutral.

331. Plaintiff alleges that defendant TISCH and defendant MEROLA used Internal Affairs Bureau mechanisms to convert ordinary, authorized, tolerated, correctable, or previously accepted executive practices into a manufactured misconduct narrative.

332. Plaintiff further alleges that defendant TISCH and defendant MEROLA used the Internal Affairs Bureau process as the mechanism to remove a Black executive whose authority, credibility, and Black and Hispanic community-facing work had become disfavored under defendant TISCH's administration.

333. In or about the first week of June 2026, plaintiff was notified by ICO Lieutenant John Fernandez that plaintiff had an appointment with Internal Affairs Bureau Group No. 1.

334. Plaintiff had not been notified of the Internal Affairs Bureau appointment by a superior or by an executive within his bureau.

335. Plaintiff called Deputy Commissioner Alden Foster to ask why none of the Community Affairs Bureau executives had notified him of the Internal Affairs Bureau appointment.

336. Deputy Commissioner Foster informed plaintiff, in substance, that none of the executives were aware of the Internal Affairs Bureau interview.

337. Plaintiff alleges that this was highly irregular because communications to an executive are ordinarily made by a superior or by someone of equal or higher rank.

338. Plaintiff alleges that the manner in which the Internal Affairs Bureau appointment was communicated reflected that the process was being driven outside ordinary bureau channels.

339. Plaintiff further alleges that defendant TISCH and defendant MEROLA caused, approved, directed, ratified, or permitted the Internal Affairs Bureau process to proceed outside ordinary bureau channels.

340. Plaintiff alleges that defendants EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, KENNETH J. HARSCH, JANE DOE 1, and MATTHEW MILLER acted as Internal Affairs Bureau proxies, implementing actors, or instruments for defendant TISCH and defendant MEROLA in connection with the manufactured-misconduct process used against plaintiff.

341. Plaintiff alleges that defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, and MILLER used Internal Affairs Bureau authority, investigative classifications, supervisory channels, and disciplinary mechanisms to give effect to defendant TISCH's and defendant MEROLA's discriminatory and retaliatory objectives.

342. Plaintiff alleges that defendant HARSCH was, at all relevant times, a Deputy Inspector assigned to Group No. 1 of the Internal Affairs Bureau.

343. Plaintiff alleges that defendant JANE DOE 1 was, at all relevant times, a female Hispanic Lieutenant assigned to Group No. 1 of the Internal Affairs Bureau.

344. Plaintiff alleges that defendant MILLER was, at all relevant times, a Sergeant assigned to Group No. 1 of the Internal Affairs Bureau.

345. On or about June 10, 2026, plaintiff appeared for an Internal Affairs Bureau interview.

346. The interview was scheduled for approximately 1000 hours.

347. Defendant DIBARTOLOMEO arrived at approximately 1040 hours.

348. Defendant DIBARTOLOMEO appeared with an intimidating demeanor.

349. Plaintiff alleges that defendant DIBARTOLOMEO acted as an Internal Affairs Bureau proxy, implementing actor, or instrument for defendant TISCH and defendant MEROLA during the interview.

350. Plaintiff was questioned concerning approximately eleven occurrences where plaintiff allegedly went PFD or EOT at the 105 Annex, where plaintiff's Department vehicle was parked.

351. Plaintiff was also questioned concerning several occasions when plaintiff's Department vehicle was allegedly used in Nassau County when plaintiff was not on the clock.

352. Plaintiff explained that he had Department-related relationships in Nassau County, including relationships involving Nassau County Explorer personnel.

353. Plaintiff further explained that he traveled to Nassau County in connection with retrieving or dropping off items related to his department work, youth-outreach responsibilities, and Explorer-related relationships.

354. Plaintiff also informed the Internal Affairs Bureau that Chief John Chell had previously authorized plaintiff to use the Department vehicle outside New York City limits when necessary for plaintiff's Department responsibilities.

355. Plaintiff alleges that defendant TISCH and defendant MEROLA, through defendant DIBARTOLOMEO, defendant THOMPSON, defendant HARSCH, defendant JANE DOE 1, and defendant MILLER, ignored, minimized, or refused to fairly credit the context of plaintiff's executive role, prior authorization, citywide duties, Nassau County youth-outreach relationships, Explorer-related responsibilities, and Department-approved practices.

356. Plaintiff alleges that defendant TISCH and defendant MEROLA, through their Internal Affairs Bureau proxies and implementing actors, also ignored the ambiguity created by the Department's failure to clearly approve or disapprove plaintiff's category 2 vehicle-status request.

357. Plaintiff further alleges that defendant TISCH and defendant MEROLA, through their Internal Affairs Bureau proxies and implementing actors, ignored that plaintiff had not been clearly told that he could no longer sign PFD at the 105 Annex.

358. Plaintiff alleges that defendant TISCH and defendant MEROLA manufactured misconduct by treating the predictable consequences of their own restrictions, ambiguity, and operational interference as intentional wrongdoing by plaintiff.

359. Plaintiff alleges that the Internal Affairs Bureau questioning was not designed to fairly determine whether plaintiff had acted with authorization, whether his practices were consistent with his executive responsibilities, or whether any alleged issue was minor, correctable, or within the Department's ordinary disciplinary matrix.

360. Plaintiff alleges that defendant TISCH and defendant MEROLA instead used the Internal Affairs Bureau process to create a false appearance of legitimate misconduct.

361. Plaintiff further alleges that defendant TISCH and defendant MEROLA caused, approved, ratified, or permitted a selectively punitive Internal Affairs Bureau process against plaintiff while favored white and Jewish executives, political insiders, and employees aligned with defendant TISCH and defendant MEROLA were not subjected to comparable investigative escalation, termination, criminal prosecution, or public stigmatization for more serious alleged misconduct.

362. Plaintiff alleges that defendant RICHARD S. TAYLOR, a Jewish male NYPD executive, was treated with extraordinary leniency despite publicly reported allegations of time theft and payroll misconduct involving approximately 172 paid hours allegedly not worked during 2024 and 2025.

363. Plaintiff alleges that defendant TAYLOR reportedly resolved that matter through a negotiated disciplinary disposition involving repayment of approximately \$20,000, forfeiture or docking of time or pay, transfer, and dismissal probation.

364. Plaintiff alleges that defendant TAYLOR was not criminally prosecuted.

365. Plaintiff alleges that defendant TAYLOR's treatment is material comparator evidence because plaintiff, a Black executive, was terminated over alleged vehicle, PFD, EOT, and executive-resource issues that defendant TISCH and defendant MEROLA manufactured into misconduct, while defendant TAYLOR, a Jewish executive, was allegedly permitted to resolve far more serious payroll and taxpayer-resource allegations without criminal prosecution.

366. Plaintiff further alleges that discovery is necessary to determine the full scope of defendant TAYLOR's alleged misconduct, including the number of tours reviewed, the relevant

lookback period, whether defendant TAYLOR 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 defendant TAYLOR received more favorable treatment than Black, disfavored, or less politically protected employees accused of comparable or less serious conduct.

367. Plaintiff alleges that David Tzall, a white male NYPD employee, was accused of substantial NYPD time-theft misconduct involving allegations that he worked at his private psychology practice while assigned to the NYPD Health and Wellness Division.

368. Plaintiff alleges that the allegations concerning Tzall involved approximately 800 hours.

369. Plaintiff alleges that Tzall was not criminally prosecuted and allegedly resigned.

370. Plaintiff alleges that Matthew J. Graziano, a white male NYPD employee, was accused of substantial NYPD time-theft misconduct involving allegations that he worked at his private psychology practice while assigned to the NYPD Health and Wellness Division.

371. Plaintiff alleges that the allegations concerning Graziano involved approximately 1,000 hours.

372. Plaintiff alleges that Graziano was not criminally prosecuted and allegedly resigned.

373. Plaintiff alleges that the Taylor, Tzall, and Graziano matters are material comparator evidence because those matters involved alleged theft of taxpayer resources, payroll

misconduct, time theft, private-business conflicts, and public-resource abuse far more serious than the vehicle, PFD, EOT, and executive-resource issues used against plaintiff.

374. Plaintiff alleges that favored white and Jewish employees aligned with, protected by, or treated favorably under defendant TISCH's and defendant MEROLA's executive structure were treated with kid gloves, negotiated outcomes, resignation opportunities, non-criminal dispositions, and reputational protection.

375. Plaintiff, by contrast, was a Black executive who was targeted, interrogated, terminated, and publicly stigmatized.

376. Plaintiff alleges that defendant TISCH's and defendant MEROLA's selective use of Internal Affairs Bureau processes against him was discriminatory, retaliatory, and pretextual.

377. Plaintiff further alleges that defendant TISCH and defendant MEROLA used the Internal Affairs Bureau process to create a false appearance of legitimate misconduct where the actual objective was to remove plaintiff from the Department, destroy his credibility, and sever his relationships with Black and Hispanic communities, youth stakeholders, Cadets, Explorers, violence-interruption partners, CMS groups, and other community stakeholders who had relied upon him.

378. Plaintiff alleges that the Internal Affairs Bureau process was the mechanism defendant TISCH and defendant MEROLA used to convert discriminatory and retaliatory preferences into an employment action against plaintiff.

379. Plaintiff alleges that defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, and MILLER participated in, advanced, approved, ratified, concealed, or implemented that process on behalf of defendant TISCH and defendant MEROLA.

380. Plaintiff alleges that the Internal Affairs Bureau process was not designed to discover the truth.

381. Plaintiff alleges that it was designed to manufacture a termination predicate for defendant TISCH and defendant MEROLA.

I. Plaintiff's Termination and Public Stigmatization

382. On or about June 24, 2026, approximately two weeks after the Internal Affairs Bureau interview, plaintiff received a telephone call from Human Resources.

383. Plaintiff was instructed to report to the office of Chief of Personnel John Benoit at approximately 1300 hours.

384. Plaintiff appeared as directed.

385. Plaintiff was informed that his termination from the New York City Police Department was effective immediately.

386. Plaintiff asked for the reason for his termination.

387. Plaintiff was not provided a reason.

388. Chief Benoit informed plaintiff, in substance, "Brian, I do not know, they did not tell me the reason."

389. Plaintiff alleges that the Department's failure to provide a reason for his immediate termination further demonstrates that the stated or implied basis for the termination was pretextual, manufactured, and controlled by defendant TISCH, defendant MEROLA, and their implementing actors.

390. Plaintiff further alleges that the speed of the termination, occurring approximately two weeks after the Internal Affairs Bureau interview, demonstrates that the IAB process was

used to supply a termination predicate rather than to conduct a fair, complete, or neutral investigation.

391. Plaintiff alleges that he was not terminated because of legitimate misconduct.

392. Plaintiff alleges that he was terminated because defendant TISCH and defendant MEROLA wanted to remove a Black executive whose authority, credibility, and community-facing relationships no longer fit their preferred internal and political structure.

393. Plaintiff further alleges that defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, and MILLER participated in, advanced, approved, ratified, concealed, or implemented the Internal Affairs Bureau process used to support the termination.

394. Plaintiff alleges that defendant TAYLOR's favorable treatment, together with the favorable treatment afforded to David Tzall, Matthew J. Graziano, and other non-Black or favored employees, confirms that plaintiff was subjected to a materially different and harsher standard.

395. Plaintiff alleges that the Department's own disciplinary practices and penalty structure did not require termination for the vehicle, PFD, EOT, or executive-resource issues used against him.

396. Plaintiff alleges that the internal penalty range for misuse of a department vehicle ordinarily included penalties such as lost vacation days, dismissal probation, or a command discipline, not immediate termination.

397. Plaintiff alleges that defendants' decision to terminate him therefore departed from ordinary Department practice and supports an inference of discriminatory and retaliatory motive.

398. On or about June 25, 2026, the day after plaintiff's termination, the New York Post published an article concerning plaintiff's termination.

399. The article reported plaintiff's termination in a manner that accused or suggested misconduct, dishonesty, and wrongdoing.

400. The article also referenced prior EEO-related information that plaintiff alleges had no connection to the vehicle, PFD, EOT, or executive-resource issues raised during the Internal Affairs Bureau interview.

401. Plaintiff alleges that the timing, substance, and circumstances of the publication support a reasonable inference that Department actors disclosed, supplied, authorized, approved, ratified, or permitted stigmatizing information concerning plaintiff's termination to be published.

402. Plaintiff alleges that the public dissemination of stigmatizing information was not incidental.

403. Plaintiff alleges that the public dissemination was part of the same discriminatory and retaliatory course of conduct designed to destroy plaintiff's credibility after his removal.

404. Plaintiff's professional value to the Department had depended heavily on trust, credibility, access, and relationships with community stakeholders.

405. By publicly associating plaintiff's termination with alleged misconduct and dishonesty, defendants damaged the same credibility that plaintiff had spent years building on behalf of the Department.

406. Plaintiff alleges that the publication severely damaged his reputation within the communities he had served.

407. Plaintiff alleges that the publication impaired his standing with Black and Hispanic community stakeholders, youth organizations, Cadets, Explorers, violence-interruption partners, CMS groups, elected officials, advocacy groups, and other public-safety stakeholders.

408. Plaintiff alleges that the publication harmed his ability to obtain future employment.

409. Plaintiff alleges that the publication caused professional stigma, humiliation, emotional distress, reputational injury, and economic harm.

410. Plaintiff further alleges that defendants' actions were especially damaging because his career had been built around trust, community credibility, and the ability to serve as a reliable bridge between the NYPD and communities whose relationships with the Department were historically strained.

411. Plaintiff alleges that defendants did not merely terminate him.

412. Plaintiff alleges that defendants used a manufactured Internal Affairs Bureau process, an unexplained immediate termination, and public stigmatization to sever plaintiff from the community relationships, public trust, and professional credibility that had defined his NYPD service.

J. Disparate Treatment, Comparator Evidence, and Pretext

413. Plaintiff alleges that defendants' treatment of him was materially different from the treatment afforded to similarly situated or favored white and Jewish executives, employees, political insiders, and Tisch-aligned personnel.

414. Plaintiff alleges that defendants selectively scrutinized, isolated, investigated, terminated, and publicly stigmatized him while treating favored white and Jewish employees

with leniency, protection, negotiated outcomes, resignation opportunities, non-criminal dispositions, and reputational insulation.

415. Plaintiff alleges that the following comparator evidence demonstrates defendants’ disparate treatment, selective enforcement, discriminatory motive, retaliatory motive, and pretext:

Comparator	Race / Protected or Favored Status	Alleged Misconduct	Reported / Alleged Department Treatment	Criminal Prosecution
RICHARD S. TAYLOR	Jewish male NYPD executive	Publicly reported allegations of time theft and payroll misconduct involving approximately 172 paid hours allegedly not worked during 2024 and 2025	Reportedly resolved through a negotiated disciplinary disposition involving repayment of approximately \$20,000, forfeiture or docking of time or pay, transfer, and dismissal probation	No
DAVID TZALL	White male NYPD employee	Alleged NYPD time theft involving allegations that he worked at his private psychology practice while assigned to the NYPD Health and Wellness Division; approximately 800 hours	Allegedly permitted to resign	No
MATTHEW J. GRAZIANO	White male NYPD employee	Alleged NYPD time theft involving allegations that he worked at his private psychology practice while assigned to the NYPD Health and Wellness Division;	Allegedly permitted to resign	No

Comparator	Race / Protected or Favored Status	Alleged Misconduct	Reported / Alleged Department Treatment	Criminal Prosecution
		approximately 1,000 hours		
ROBERT O'HARE	Favored non-Black NYPD executive	Alleged interference in a high-profile news-related matter involving Sergeant Michael Merrick, who had been arrested in Penn Station for a lewd public act	Not disciplined or removed; instead, allegedly promoted or given greater Department responsibility, including assignment to oversee Department Operations	No
ARTAN KURTOVIC	Favored NYPD employee; member of the NYPD Rugby team	Arrested and charged with drunk driving in or about January 2026	Allegedly received no Department penalty	No
JAMES GIOVANSANTI	Favored NYPD employee	Accumulated approximately 547 speeding tickets over approximately three years, despite community and political complaints concerning public safety	Allegedly not disciplined by the Internal Affairs Bureau; merely restricted from driving a department radio motor patrol vehicle while the investigation continued	No
JOEL ROSENTHAL	White Jewish male employee closely aligned with defendant TISCH	Not pleaded as misconduct comparator; pleaded as favored-advancement comparator	Allegedly rapidly promoted after arriving in defendant TISCH's office	Not applicable

416. Plaintiff alleges that the Taylor, Tzall, and Graziano matters are particularly material because those matters involved alleged theft of taxpayer resources, payroll misconduct, time theft, private-business conflicts, and public-resource abuse far more serious than the vehicle, PFD, EOT, or executive-resource issues used against plaintiff.

417. Plaintiff alleges that defendant TAYLOR's treatment is especially material because plaintiff, a Black executive, was terminated over alleged vehicle, PFD, EOT, and executive-resource issues that defendant TISCH and defendant MEROLA manufactured into misconduct, while defendant TAYLOR, a Jewish executive, was allegedly permitted to resolve far more serious payroll and taxpayer-resource allegations without criminal prosecution.

418. Plaintiff further alleges that discovery is necessary to determine the full scope of defendant TAYLOR's alleged misconduct, including the number of tours reviewed, the relevant lookback period, whether defendant TAYLOR 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 defendant TAYLOR received more favorable treatment than Black, disfavored, or less politically protected employees accused of comparable or less serious conduct.

419. Plaintiff alleges that favored white and Jewish employees aligned with, protected by, or treated favorably under defendant TISCH's and defendant MEROLA's executive structure were treated with kid gloves, negotiated outcomes, resignation opportunities, non-criminal dispositions, and reputational protection.

420. Plaintiff, by contrast, was a Black executive who was targeted, interrogated, terminated, and publicly stigmatized.

421. Plaintiff alleges that defendants did not apply neutral disciplinary, personnel, investigative, or executive-management standards.

422. Plaintiff alleges that defendants applied one standard to favored white and Jewish employees, political insiders, and Tisch-aligned personnel, and a materially harsher standard to plaintiff.

423. Plaintiff alleges that the Department treated alleged theft of taxpayer resources, payroll misconduct, time theft, private-business conflicts, public-safety concerns, and serious off-duty misconduct with leniency when the accused employees were favored, white, Jewish, politically protected, or aligned with defendant TISCH's and defendant MEROLA's preferred structure.

424. Plaintiff alleges that defendants treated plaintiff's alleged vehicle, PFD, EOT, and executive-resource issues as terminable misconduct only because plaintiff was a Black executive whom defendant TISCH and defendant MEROLA wanted removed.

425. Plaintiff alleges that the alleged misconduct used against him was manufactured, exaggerated, selectively enforced, and inconsistent with Department practice.

426. Plaintiff further alleges that the Department's internal penalty structure for vehicle misuse did not call for immediate termination.

427. Plaintiff alleges that the internal penalty range for misuse of a Department vehicle ordinarily included penalties such as lost vacation days, dismissal probation, or a command discipline.

428. Plaintiff alleges that the decision to terminate him therefore departed from ordinary Department practice.

429. Plaintiff alleges that defendants' departure from ordinary Department practice supports an inference of discrimination, retaliation, selective enforcement, and pretext.

430. Plaintiff alleges that defendants' comparator treatment also supports an inference that the reasons used or implied for plaintiff's termination were false, incomplete, selectively applied, or not the real reasons for the termination.

431. Plaintiff alleges that the real reasons were plaintiff's race, defendant TISCH's and defendant MEROLA's hostility toward Black executives perceived as connected to former Chief of Department Jeffrey B. Maddrey, plaintiff's Black and Hispanic community-centered work, plaintiff's loss of favor within defendant TISCH's preferred internal structure, and defendants' desire to replace or marginalize plaintiff's community-facing authority.

432. Plaintiff alleges that defendants' conduct was discriminatory, retaliatory, selectively punitive, and pretextual.

K. Damages and Continuing Harm

433. As a direct and proximate result of defendants' discriminatory, retaliatory, selectively punitive, and pretextual conduct, plaintiff suffered economic damages.

434. Plaintiff lost his employment with the New York City Police Department.

435. Plaintiff lost salary, compensation, benefits, pension-related value, employment security, and other economic advantages associated with his NYPD employment.

436. Plaintiff has also suffered and will continue to suffer future lost earnings, lost employment opportunities, lost professional advancement, and diminished earning capacity.

437. Plaintiff's damages were aggravated by the manner in which defendants terminated him.

438. Plaintiff was terminated immediately, without being provided a reason.

439. Plaintiff alleges that the unexplained termination caused additional professional uncertainty, reputational harm, and impairment of future employment opportunities.

440. Plaintiff's damages were further aggravated by the public reporting concerning his termination.

441. Plaintiff alleges that information concerning his termination was published publicly in a manner that associated him with misconduct, dishonesty, and wrongdoing.

442. Plaintiff alleges that the public reporting damaged his professional reputation.

443. Plaintiff alleges that the public reporting impaired his credibility with community stakeholders, youth organizations, Cadets, Explorers, CMS groups, violence-interruption partners, elected officials, advocacy groups, families of crime victims, and other communities and organizations he had served during his NYPD career.

444. Plaintiff alleges that the reputational harm was especially severe because his professional value depended on trust, credibility, access, and relationships with communities whose relationships with the NYPD were historically strained, sensitive, or distrustful.

445. Plaintiff alleges that defendants' conduct impaired his ability to obtain future employment, consulting opportunities, public-safety work, community-relations work, government work, private-sector opportunities, and other professional opportunities requiring credibility, integrity, and trust.

446. Plaintiff suffered emotional distress, humiliation, embarrassment, anxiety, loss of dignity, loss of professional standing, and damage to his personal and professional identity.

447. Plaintiff suffered the pain and indignity of being stripped of authority, isolated, investigated, terminated, and publicly stigmatized after years of performing sensitive and effective community-facing work for the Department.

448. Plaintiff alleges that defendants' conduct damaged his relationships with the very Black and Hispanic communities, youth stakeholders, violence-interruption partners, Cadets, Explorers, elected officials, and community groups the Department had relied upon him to reach.

449. Plaintiff alleges that defendants' conduct caused him to suffer continuing reputational, emotional, professional, and economic harm.

450. Plaintiff has incurred, and will continue to incur, attorneys' fees, litigation expenses, expert fees, costs, and disbursements in connection with this action.

451. Plaintiff seeks compensatory damages, punitive damages against the individual defendants where permitted by law, pre-judgment interest, post-judgment interest, attorneys' fees, costs, disbursements, and all other relief available under the New York State Human Rights Law, the New York City Human Rights Law, and applicable New York law.

452. Plaintiff further seeks such other and further relief as this Court deems just, proper, equitable, and necessary to remedy defendants' unlawful conduct.

VIOLATIONS AND CLAIMS ALLEGED

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

453. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

454. Plaintiff is a member of protected classes within the meaning of the New York State Human Rights Law, Executive Law § 290 et seq., including race and color.

455. 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.

456. At all relevant times, the individual defendants were employers, supervisors, managers, agents, and/or persons who aided, abetted, incited, compelled, or coerced discriminatory conduct within the meaning of the New York State Human Rights Law.

457. Defendants discriminated against plaintiff because of his race and color by subjecting him to less favorable terms, conditions, and privileges of employment than similarly situated or favored non-Black employees, executives, political insiders, and Tisch-aligned personnel.

458. Defendants' discriminatory conduct included, but was not limited to, reducing plaintiff's executive authority, restricting his community-facing work, dismantling his operational support, removing or limiting access and resources, selectively invoking investigative and disciplinary mechanisms, manufacturing misconduct, terminating his employment, and causing or permitting reputational harm.

459. Defendants treated plaintiff less favorably than favored white and Jewish employees who were allegedly afforded greater protection, advancement, leniency, negotiated outcomes, resignation opportunities, non-criminal dispositions, and reputational insulation despite comparable or more serious alleged misconduct.

460. Defendants stated, implied, or anticipated reasons for their treatment of plaintiff were false, incomplete, selectively enforced, pretextual, and not the true reasons for the adverse treatment.

461. Plaintiff's race and color were motivating factors in defendants' conduct.

462. Defendants TISCH and MEROLA directly participated in, approved, ratified, directed, permitted, and/or failed to correct the discriminatory conduct.

463. Defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, MILLER, and TAYLOR directly participated in, advanced, implemented, ratified, and/or aided and abetted the discriminatory conduct.

464. The individual defendants are liable under Executive Law § 296(6) because they actually participated in, aided, abetted, incited, compelled, coerced, approved, ratified, or failed to correct discriminatory conduct directed at plaintiff.

465. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, reputational harm, emotional distress, humiliation, loss of dignity, loss of professional standing, impairment of future employment opportunities, attorneys' fees, costs, and other damages.

466. Defendants' conduct violated the New York State Human Rights Law.

467. Plaintiff is entitled to all relief available under the New York State Human Rights Law, including compensatory damages, punitive damages against the individual defendants where permitted by law, pre-judgment interest, post-judgment interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

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

468. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

469. Plaintiff is a member of protected classes within the meaning of the New York State Human Rights Law, including race and color.

470. 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.

471. Defendants subjected plaintiff to inferior terms, conditions, and privileges of employment because of his race and color.

472. Defendants' conduct subjected plaintiff to a discriminatory hostile work environment within the meaning of the New York State Human Rights Law.

473. The hostile work environment included, but was not limited to, the selective dismantling of plaintiff's executive authority, the restriction of plaintiff's Black and Hispanic community-centered work, the reduction of his access and operational support, the marginalization of his role, the use of favored insiders to contain or control him, the selective use of Internal Affairs Bureau processes, the manufacture of alleged misconduct, the termination of his employment, and the public stigmatization that followed.

474. Defendants' conduct was more than a petty slight or trivial inconvenience.

475. Defendants' conduct altered plaintiff's working conditions, undermined his executive authority, impaired his credibility with subordinates and community stakeholders, damaged his professional standing, and created an abusive, humiliating, and discriminatory work environment.

476. Defendants' conduct was connected to plaintiff's race and color, including defendants' differential treatment of plaintiff as a Black executive, defendants' treatment of Black executives perceived as connected to former Chief of Department Jeffrey B. Maddrey, and defendants' more favorable treatment of white and Jewish executives, employees, political insiders, and Tisch-aligned personnel.

477. Defendants TISCH and MEROLA directly participated in, approved, ratified, directed, permitted, and/or failed to correct the hostile work environment.

478. Defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, MILLER, and TAYLOR directly participated in, advanced, implemented, ratified, and/or aided and abetted the hostile work environment.

479. The individual defendants are liable under Executive Law § 296(6) because they actually participated in, aided, abetted, incited, compelled, coerced, approved, ratified, or failed to correct discriminatory hostile-environment conduct directed at plaintiff.

480. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, reputational harm, emotional distress, humiliation, loss of dignity, loss of professional standing, impairment of future employment opportunities, attorneys' fees, costs, and other damages.

481. Defendants' conduct violated the New York State Human Rights Law.

482. Plaintiff is entitled to all relief available under the New York State Human Rights Law, including compensatory damages, punitive damages against the individual defendants where permitted by law, pre-judgment interest, post-judgment interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

COUNT III
Retaliation in Violation of the
New York State Human Rights Law
Against All Defendants

483. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

484. Plaintiff engaged in protected activity within the meaning of the New York State Human Rights Law by opposing, objecting to, reporting, resisting, or otherwise challenging discriminatory, retaliatory, selectively punitive, and disparate treatment within the Department.

485. Plaintiff's protected activity included, but was not limited to, objecting to retaliatory or unfair supervisory placement under defendant TAYLOR, raising concerns regarding the dismantling of his authority and support, challenging or explaining the selective and pretextual use of vehicle, PFD, EOT, and Department-resource issues against him, and opposing treatment that he reasonably believed was discriminatory, retaliatory, or selectively enforced.

486. Defendants knew or reasonably should have known of plaintiff's protected activity.

487. After plaintiff engaged in protected activity, defendants subjected him to adverse treatment.

488. Defendants' retaliatory conduct included, but was not limited to, restricting plaintiff's authority, access, support, and community-facing work; placing or attempting to place him under favored or hostile supervisory structures; escalating him into an Internal Affairs Bureau process; manufacturing alleged misconduct; terminating his employment; and causing or permitting public stigmatization.

489. Defendants' conduct would reasonably deter a person from engaging in protected activity.

490. There was a causal connection between plaintiff's protected activity and defendants' adverse treatment, including temporal proximity, selective enforcement, departure from ordinary Department practice, disparate comparator treatment, and defendants' escalation

of the manufactured-misconduct process after plaintiff challenged or resisted the conduct directed at him.

491. Defendants stated, implied, or anticipated reasons for their conduct were false, incomplete, selectively enforced, pretextual, and not the true reasons for the adverse treatment.

492. Retaliation was a motivating factor in defendants' conduct.

493. Defendants TISCH and MEROLA directly participated in, approved, ratified, directed, permitted, and/or failed to correct the retaliatory conduct.

494. Defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, MILLER, and TAYLOR directly participated in, advanced, implemented, ratified, and/or aided and abetted the retaliatory conduct.

495. The individual defendants are liable under Executive Law § 296(6) because they actually participated in, aided, abetted, incited, compelled, coerced, approved, ratified, or failed to correct retaliatory conduct directed at plaintiff.

496. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, reputational harm, emotional distress, humiliation, loss of dignity, loss of professional standing, impairment of future employment opportunities, attorneys' fees, costs, and other damages.

497. Defendants' conduct violated the New York State Human Rights Law.

498. Plaintiff is entitled to all relief available under the New York State Human Rights Law, including compensatory damages, punitive damages against the individual defendants where permitted by law, pre-judgment interest, post-judgment interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

COUNT IV
Race Discrimination in Violation of the
New York City Human Rights Law
Against All Defendants

499. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

500. Plaintiff is a member of protected classes within the meaning of the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq., including race and color.

501. 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.

502. At all relevant times, the individual defendants were employers, supervisors, managers, agents, employees, and/or persons who aided, abetted, incited, compelled, or coerced discriminatory conduct within the meaning of the New York City Human Rights Law.

503. Defendants discriminated against plaintiff by treating him less well, at least in part, because of his race and color.

504. Defendants' discriminatory conduct included, but was not limited to, reducing plaintiff's executive authority, restricting his Black and Hispanic community-centered work, dismantling his operational support, removing or limiting executive access and Department resources, selectively invoking investigative and disciplinary mechanisms, manufacturing misconduct, terminating his employment, and causing or permitting reputational harm.

505. Defendants treated plaintiff less favorably than favored white and Jewish employees, executives, political insiders, and Tisch-aligned personnel with respect to assignments, access, compensation, discipline, protection, advancement, investigative treatment, reputational treatment, and employment consequences.

506. Defendants' conduct was not a petty slight or trivial inconvenience.

507. Defendants' conduct deprived plaintiff of equal terms, conditions, and privileges of employment and materially impaired his authority, credibility, professional standing, community relationships, and employment.

508. Defendants stated, implied, or anticipated reasons for their treatment of plaintiff were false, incomplete, selectively enforced, pretextual, and not the true reasons for the adverse treatment.

509. Plaintiff's race and color were motivating factors in defendants' conduct.

510. Defendants TISCH and MEROLA directly participated in, approved, ratified, directed, permitted, and/or failed to correct the discriminatory conduct.

511. Defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, MILLER, and TAYLOR directly participated in, advanced, implemented, ratified, and/or aided and abetted the discriminatory conduct.

512. The individual defendants are liable under Administrative Code of the City of New York § 8-107(6) because they actually participated in, aided, abetted, incited, compelled, coerced, approved, ratified, or failed to correct discriminatory conduct directed at plaintiff.

513. Defendants' conduct violated the New York City Human Rights Law.

514. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, reputational harm, emotional distress, humiliation, loss of dignity, loss of professional standing, impairment of future employment opportunities, attorneys' fees, costs, and other damages.

515. Plaintiff is entitled to all relief available under the New York City Human Rights Law, including compensatory damages, punitive damages, pre-judgment interest, post-judgment

interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

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

516. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

517. Plaintiff is a member of protected classes within the meaning of the New York City Human Rights Law, including race and color.

518. 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.

519. Defendants subjected plaintiff to inferior terms, conditions, and privileges of employment because of his race and color.

520. Defendants' conduct subjected plaintiff to a discriminatory hostile work environment within the meaning of the New York City Human Rights Law.

521. The hostile work environment included, but was not limited to, the selective dismantling of plaintiff's Deputy Chief-equivalent executive authority, the restriction of plaintiff's Black and Hispanic community-centered work, the reduction of his access and operational support, the marginalization of his role, the use of favored insiders to contain or control him, the selective use of Internal Affairs Bureau processes, the manufacture of alleged misconduct, the termination of his employment, and the public stigmatization that followed.

522. Defendants treated plaintiff less well, at least in part, because of his race and color.

523. Defendants' conduct was not a petty slight or trivial inconvenience.

524. Defendants' conduct undermined plaintiff's authority, impaired his credibility with subordinates and community stakeholders, damaged his professional standing, isolated him from executive support, and created a discriminatory, humiliating, and hostile work environment.

525. Defendants' conduct was connected to plaintiff's race and color, including defendants' differential treatment of plaintiff as a Black executive, defendants' treatment of Black executives perceived as connected to former Chief of Department Jeffrey B. Maddrey, and defendants' more favorable treatment of white and Jewish executives, employees, political insiders, and Tisch-aligned personnel.

526. Defendants TISCH and MEROLA directly participated in, approved, ratified, directed, permitted, and/or failed to correct the hostile work environment.

527. Defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, MILLER, and TAYLOR directly participated in, advanced, implemented, ratified, and/or aided and abetted the hostile work environment.

528. The individual defendants are liable under Administrative Code of the City of New York § 8-107(6) because they actually participated in, aided, abetted, incited, compelled, coerced, approved, ratified, or failed to correct discriminatory hostile-environment conduct directed at plaintiff.

529. Defendants' conduct violated the New York City Human Rights Law.

530. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, reputational harm, emotional distress, humiliation, loss of dignity, loss of professional standing, impairment of future employment opportunities, attorneys' fees, costs, and other damages.

531. Plaintiff is entitled to all relief available under the New York City Human Rights Law, including compensatory damages, punitive damages, pre-judgment interest, post-judgment interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

COUNT VI
Retaliation in Violation of the
New York City Human Rights Law
Against All Defendants

532. Plaintiff repeats, reiterates, and realleges each and every allegation set forth above as if fully set forth herein.

533. Plaintiff engaged in protected activity within the meaning of the New York City Human Rights Law by opposing, objecting to, reporting, resisting, or otherwise challenging discriminatory, retaliatory, selectively punitive, and disparate treatment within the Department.

534. Plaintiff's protected activity included, but was not limited to, objecting to retaliatory or unfair supervisory placement under defendant TAYLOR, raising concerns regarding the dismantling of his authority and support, challenging or explaining the selective and pretextual use of vehicle, PFD, EOT, and Department-resource issues against him, and opposing treatment that he reasonably believed was discriminatory, retaliatory, or selectively enforced.

535. Defendants knew or reasonably should have known of plaintiff's protected activity.

536. Defendants retaliated against plaintiff by engaging in conduct reasonably likely to deter a person from engaging in protected activity.

537. Defendants' retaliatory conduct included, but was not limited to, restricting plaintiff's authority, access, support, and community-facing work; placing or attempting to place

him under favored or hostile supervisory structures; escalating him into an Internal Affairs Bureau process; manufacturing alleged misconduct; terminating his employment; and causing or permitting public stigmatization.

538. Defendants' conduct was reasonably likely to deter plaintiff and other employees from opposing discrimination, retaliation, selective enforcement, disparate treatment, or misuse of Department investigative and disciplinary processes.

539. There was a causal connection between plaintiff's protected activity and defendants' retaliatory conduct.

540. Causation is supported by, among other things, temporal proximity, selective enforcement, departure from ordinary Department practice, disparate comparator treatment, escalation after plaintiff objected to or resisted defendants' conduct, and defendants' use of a manufactured-misconduct process after plaintiff raised concerns.

541. Defendants stated, implied, or anticipated reasons for their conduct were false, incomplete, selectively enforced, pretextual, and not the true reasons for the adverse treatment.

542. Retaliation was a motivating factor in defendants' conduct.

543. Defendants TISCH and MEROLA directly participated in, approved, ratified, directed, permitted, and/or failed to correct the retaliatory conduct.

544. Defendants THOMPSON, DIBARTOLOMEO, HARSCH, JANE DOE 1, MILLER, and TAYLOR directly participated in, advanced, implemented, ratified, and/or aided and abetted the retaliatory conduct.

545. The individual defendants are liable under Administrative Code of the City of New York § 8-107(6) because they actually participated in, aided, abetted, incited, compelled, coerced, approved, ratified, or failed to correct retaliatory conduct directed at plaintiff.

546. Defendants' conduct violated the New York City Human Rights Law.

547. As a direct and proximate result of defendants' unlawful conduct, plaintiff suffered economic damages, reputational harm, emotional distress, humiliation, loss of dignity, loss of professional standing, impairment of future employment opportunities, attorneys' fees, costs, and other damages.

548. Plaintiff is entitled to all relief available under the New York City Human Rights Law, including compensatory damages, punitive damages, pre-judgment interest, post-judgment interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

JURY TRIAL

549. Plaintiff BRIAN K. ADAMS hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff BRIAN K. ADAMS respectfully demands judgment against defendants THE CITY OF NEW YORK; JESSICA S. TISCH, RYAN MEROLA, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, RICHARD S. TAYLOR, KENNETH J. HARSCH, JANE DOE 1, and MATTHEW MILLER, 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, Executive Law § 290 et seq.;
- b. Declaring that defendants violated plaintiff's rights under the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq.;

- c. Awarding plaintiff compensatory damages in an amount to be determined at trial, including but not limited to damages for lost wages, lost benefits, lost compensation, lost employment opportunities, diminished earning capacity, reputational harm, emotional distress, humiliation, embarrassment, loss of dignity, loss of professional standing, and other consequential damages;
- d. Awarding plaintiff front pay, back pay, lost benefits, and all other make-whole economic relief available under the New York State Human Rights Law, the New York City Human Rights Law, and applicable New York law;
- e. Awarding plaintiff punitive damages against the individual defendants in an amount to be determined at trial and to the fullest extent permitted by law;
- f. Awarding plaintiff pre-judgment interest and post-judgment interest as permitted by law;
- g. Awarding plaintiff reasonable attorneys' fees, expert fees, costs, disbursements, and litigation expenses pursuant to the New York State Human Rights Law, the New York City Human Rights Law, and all other applicable law;
- h. Awarding plaintiff such equitable relief as may be necessary and appropriate to remedy defendants' unlawful conduct, including but not limited to expungement, correction, removal, or non-disclosure of false, stigmatizing, discriminatory, retaliatory, or pretextual personnel, investigative, disciplinary, and termination-related records;
- i. Enjoining defendants from relying upon, republishing, redistributing, or further disseminating false, stigmatizing, discriminatory, retaliatory, or

pretextual information concerning plaintiff's termination, alleged misconduct, Internal Affairs Bureau matter, or employment separation;

- j. Directing defendants to preserve all documents, electronically stored information, communications, investigative records, personnel records, disciplinary records, access records, vehicle records, PFD/EOT records, Internal Affairs Bureau records, comparator records, press communications, and other materials relevant to the claims and defenses in this action;
- k. Awarding plaintiff all other legal, equitable, declaratory, monetary, and make-whole relief available under the New York State Human Rights Law, the New York City Human Rights Law, and applicable New York law; and
- l. Awarding plaintiff such other and further relief as this Court deems just, proper, and equitable.

Dated: July 6, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff BRIAN K. ADAMS

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ATTORNEY VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

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

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

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

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

Dated: July 6, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff BRIAN K. ADAMS

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BRIAN K. ADAMS

Plaintiff,

-against-

THE CITY OF NEW YORK; JESSICA S. TISCH, RYAN
MEROLA, EDWARD A. THOMPSON, JOSEPH A.
DIBARTOLOMEO, RICHARD S. TAYLOR, KENNETH J.
HARSCH, JANE DOE 1, and MATTHEW MILLER

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff BRIAN K. ADAMS

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