

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

-----X
DANIELLE E. RAIA

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK, JESSICA S. TISCH, KAZ
DAUGHTRY, MICHAEL J. LIPETRI, JEFFREY B.
MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY

Defendants
-----X

To the Defendant named above:

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

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

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

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

Plaintiff designates New York County as the place of trial.

The basis of venue is as follows: plaintiff resides in Queens County; NYPD Headquarters, the Office of the Police Commissioner, and the City-level offices, records, decision-making authority, approvals, ratifications, and implementation mechanisms implicated

in this action are located in New York County; and a substantial part of the discriminatory, hostile, retaliatory, supervisory, personnel, disciplinary, and post-retirement credential-related conduct alleged herein was directed, approved, ratified, maintained, or continued through NYPD Headquarters and City-level authority in New York County.

Although venue could potentially be placed in Queens County based upon plaintiff's residence, plaintiff designates New York County as the place of trial because this action challenges senior-level NYPD employment decisions, command assignments, supervisory actions, resource denials, personnel determinations, disciplinary escalation, records, approvals, ratifications, post-retirement credential consequences, Good-Guy letter issues, retired-identification-card restrictions, handgun-license-related conduct, and continuing institutional actions maintained, approved, implemented, or continued through NYPD Headquarters and City-level authority in New York County.

Dated: July 3, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DANIELLE E. RAIA

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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, KAZ DAUGHTRY, MICHAEL J. LIPETRI,
JEFFREY B. MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY
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 DANIELLE E. RAIA, by her attorney THE SANDERS FIRM, P.C., complaining of defendants THE CITY OF NEW YORK, JESSICA S. TISCH, KAZ DAUGHTRY, MICHAEL J. LIPETRI, JEFFREY B. MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY, alleges as follows:

INTRODUCTION

This is an action for gender discrimination, hostile work environment, retaliation, selective enforcement, and continuing post-employment retaliation under the New York State Human Rights Law (“NYSHRL”) and the New York City Human Rights Law (“NYCHRL”).

Plaintiff DANIELLE E. RAIA is a retired New York City Police Department (“NYPD”) Inspector and former senior uniformed executive who served the Department for approximately twenty-six years. Plaintiff alleges that when she was treated fairly and supported according to her rank, experience, and qualifications, she performed effectively.

This case arises from senior NYPD command practices that allegedly denied plaintiff equal authority, equal support, equal protection, and disciplinary fairness because she is a woman, because she complained about discriminatory and hostile command conditions, because

she supported Black and Hispanic officers, and because she resisted discriminatory and retaliatory treatment.

Plaintiff alleges that defendant THE CITY OF NEW YORK, through the NYPD and its executives, supervisors, managers, disciplinary actors, personnel authorities, and agents, permitted a senior-command environment in which plaintiff was bypassed, undermined, denied operational discretion, denied necessary support, subjected to gendered and sexualized treatment, selectively investigated, selectively disciplined, and punished by accusation.

Plaintiff alleges that defendant JESSICA S. TISCH, as Police Commissioner, had supervisory, personnel, disciplinary, corrective, ratification, and final decision-making authority over the NYPD. Plaintiff further alleges that defendant TISCH permitted unresolved and unproven Charges and Specifications to be used against plaintiff without a plea, trial, finding of guilt, final disciplinary adjudication, or judicial finding establishing misconduct, and failed to ensure that plaintiff's disciplinary and due-process interests were protected.

Plaintiff alleges that defendant KAZ DAUGHTRY is central to the Technical Assistance and Response Unit ("TARU") allegations because MADDREY identified DAUGHTRY as plaintiff's direct supervisor, DAUGHTRY exercised operational control over TARU, imposed unrealistic response expectations, and failed to provide or secure the Executive Officer and personnel support plaintiff repeatedly requested.

Plaintiff alleges that defendant MICHAEL J. LIPETRI is central to the discriminatory replacement and comparator sequence because plaintiff was removed from TARU and replaced by Deputy Inspector Kevin R. Cain, a lower-ranked male successor connected to the LIPETRI / CHELL command network, who immediately received the Executive Officer and personnel support plaintiff had been denied.

Plaintiff alleges that defendant JEFFREY B. MADDREY is central to notice, protected activity, failure to remediate, plaintiff's withdrawal of retirement papers, and the placement decisions that followed. MADDREY allegedly knew plaintiff was complaining about discriminatory and hostile command conditions, placed plaintiff into TARU to change a discriminatory culture, and then failed to provide the support, protection, or remediation necessary to prevent further discrimination and retaliation.

Plaintiff alleges that defendant JOHN M. CHELL is central to TARU operational control, the denial of support, the Skydio-related allegations, plaintiff's medical and operational circumstances, and the comparator sequence involving plaintiff's male successor. Plaintiff further alleges that CHELL treated plaintiff differently from her male successor and participated in the command conditions leading to plaintiff's removal from TARU.

Plaintiff alleges that defendant JOSEPH E. KENNY is central to the Detective Bureau hostile-work-environment allegations because he repeatedly denigrated Field Intelligence Officer experience despite knowing plaintiff's firearms-investigation background, thereby helping undermine plaintiff's authority, expertise, and command standing in Gun Violence.

The central comparator event occurred after plaintiff was removed from TARU. Plaintiff, a female Inspector and the first female Commanding Officer of TARU, had repeatedly requested an Executive Officer and necessary personnel support. Those requests were denied, ignored, or left unresolved. After plaintiff's removal, the NYPD installed a lower-ranked male successor and provided him the Executive Officer and personnel support plaintiff had been denied.

Plaintiff further alleges that the Department escalated, approved, ratified, or continued retaliatory disciplinary action after she complained, after she resisted discriminatory command practices, and after she operated TARU without the support routinely afforded to male command

actors. The Charges and Specifications later used against plaintiff remained unresolved and unproven. Plaintiff did not plead guilty, did not receive a department trial, and was never found guilty.

Plaintiff alleges that unresolved and unproven allegations were nevertheless treated as established misconduct and used to pressure plaintiff's separation, damage her professional standing, impair her retirement-related and firearm-related interests, and harm her post-retirement employment opportunities.

Therefore, plaintiff seeks judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, KAZ DAUGHTRY, MICHAEL J. LIPETRI, JEFFREY B. MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY, jointly and severally where permitted by law, awarding compensatory damages, back pay, front pay, lost benefits, lost accruals, retirement-related losses, emotional-distress damages, punitive damages where available, declaratory relief, injunctive relief, pre-judgment and post-judgment interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

JURISDICTION AND VENUE

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

2. This Court has personal jurisdiction over defendant THE CITY OF NEW YORK because it is a municipal corporation organized and existing under the laws of the State of New York, conducts business within the State of New York, and operates the New York City Police Department ("NYPD"), including within New York County.

3. This Court has personal jurisdiction over defendant JESSICA S. TISCH, in her official and individual capacities, because she is the Police Commissioner of the City of New York, maintains official authority within the State of New York, and is sued for official-capacity and individual-capacity relief concerning NYPD employment actions, personnel records, disciplinary consequences, retired-identification-card issues, Good-Guy-letter issues, handgun-license-related consequences, and continuing post-employment harms.

4. This Court has personal jurisdiction over defendant KAZ DAUGHTRY, in his official and individual capacities, because, during the relevant period, he exercised supervisory, operational, command, personnel, and/or resource-allocation authority over plaintiff and/or the Technical Assistance and Response Unit (“TARU”) within the State of New York, and personally participated in, directed, approved, ratified, failed to correct, or continued the discriminatory, hostile, retaliatory, disciplinary, and post-employment conduct alleged herein.

5. This Court has personal jurisdiction over defendant JEFFREY B. MADDREY, in his official and individual capacities, because, during the relevant period, he exercised senior NYPD command, supervisory, personnel, placement, and/or remedial authority within the State of New York, received notice of plaintiff’s complaints, and personally participated in, directed, approved, ratified, failed to correct, or continued the discriminatory, hostile, retaliatory, disciplinary, and post-employment conduct alleged herein.

6. This Court has personal jurisdiction over defendant JOHN M. CHELL, in his official and individual capacities, because, during the relevant period, he exercised senior NYPD command, supervisory, operational, personnel, resource-allocation, and/or remedial authority within the State of New York, and personally participated in, directed, approved, ratified, failed

to correct, or continued the discriminatory, hostile, retaliatory, disciplinary, and post-employment conduct alleged herein.

7. This Court has personal jurisdiction over defendant JOSEPH E. KENNY, in his official and individual capacities, because, during the relevant period, he exercised senior NYPD command, supervisory, operational, and/or remedial authority within the State of New York, including within the Detective Bureau, and personally participated in, directed, approved, ratified, failed to correct, or continued the discriminatory, hostile, retaliatory, and related conduct alleged herein.

8. This Court has personal jurisdiction over defendant MICHAEL LIPETRI, in his official and individual capacities, because, during the relevant period, he exercised senior NYPD command, supervisory, personnel, operational, resource-allocation, and/or remedial authority within the State of New York, including authority connected to the command pipeline and comparator sequence involving plaintiff's lower-ranked male successor at TARU, and personally participated in, directed, approved, ratified, failed to correct, or continued the discriminatory, hostile, retaliatory, disciplinary, and post-employment conduct alleged herein.

9. Venue is proper in New York County pursuant to CPLR §§ 503 and 504. Plaintiff resides in Queens County. NYPD Headquarters, the Office of the Police Commissioner, and City-level offices, records, approvals, ratifications, disciplinary processes, personnel processes, command-assignment mechanisms, retired-identification-card processes, Good-Guy-letter processes, handgun-license-related authority, and employment decision-making authority implicated in this action are located in New York County.

10. Although venue could potentially be placed in Queens County based upon plaintiff's residence, plaintiff designates New York County as the place of trial because this

action challenges senior-level NYPD employment decisions, command assignments, personnel determinations, resource denials, disciplinary charges, records, approvals, ratifications, retired-identification-card consequences, Good-Guy-letter consequences, handgun-license-related consequences, and continuing institutional conduct maintained, implemented, approved, ratified, or continued through NYPD Headquarters and City-level authority in New York County.

PROCEDURAL REQUIREMENTS

11. Plaintiff has complied with all condition's precedent to the commencement of this action, or such conditions precedent have been waived, excused, satisfied, or are inapplicable.

12. This action is brought under the New York State Human Rights Law ("NYSHRL") and the New York City Human Rights Law ("NYCHRL") for gender discrimination, hostile work environment, retaliation, aiding and abetting, and continuing post-employment retaliation.

13. No notice of claim is required as a condition precedent to plaintiff's NYSHRL and NYCHRL claims because plaintiff seeks relief for employment discrimination, hostile work environment, retaliation, and related civil-rights violations, not common-law tort damages.

14. Plaintiff has not elected an administrative remedy that would bar this action. Plaintiff has not filed, prosecuted, or resolved these NYSHRL or NYCHRL claims before the New York State Division of Human Rights, the New York City Commission on Human Rights, or any other administrative agency in a manner that would deprive this Court of jurisdiction.

15. Plaintiff's claims are timely because defendants' discriminatory, hostile, retaliatory, disciplinary, and post-employment conduct occurred within the applicable limitations period, continued into the limitations period, or produced continuing consequences maintained, ratified, approved, or implemented by defendants.

16. Plaintiff seeks legal, equitable, declaratory, and injunctive relief, including damages, correction of records, appropriate post-retirement credential relief, attorneys' fees, costs, interest, and all other relief available under the NYSHRL and NYCHRL.

PLAINTIFF

17. Plaintiff DANIELLE E. RAIA is a natural person and resident of Queens County, New York.

18. Plaintiff is a retired New York City Police Department ("NYPD") Inspector who served the Department for approximately twenty-six years.

19. During her NYPD career, plaintiff held senior investigative, operational, administrative, technical, and command assignments, including Commanding Officer of the Technical Assistance and Response Unit ("TARU"), Executive Officer of the Domestic Violence Unit, and Commanding Officer of the Gun Recidivist Investigation Program ("GRIP").

20. Plaintiff was the first female Commanding Officer of TARU.

21. At all relevant times, plaintiff was qualified for the positions she held and performed her duties satisfactorily when provided fair supervision, equal authority, and adequate command support.

22. Plaintiff is a member of a protected class based upon her sex and gender.

23. Plaintiff engaged in protected activity by opposing and complaining about discriminatory, hostile, and retaliatory treatment based upon sex, gender, hostile work environment, and related protected concerns.

DEFENDANTS

24. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York and, at all relevant times, was plaintiff's employer through the New York City Police Department ("NYPD").

25. Defendant JESSICA S. TISCH is a female and, at all relevant times since her appointment, has served as Police Commissioner of the City of New York. Defendant JESSICA S. TISCH is sued in her official and individual capacities.

26. Defendant KAZ DAUGHTRY is a male and, during the relevant period, served as a senior NYPD executive, including as Deputy Commissioner of Operations and/or in a senior operational role exercising authority over NYPD operations, resources, personnel, and command decisions affecting plaintiff. Defendant KAZ DAUGHTRY is sued in his official and individual capacities.

27. Defendant JEFFREY B. MADDREY is a male and, during the relevant period, served as a senior NYPD executive, including as Chief of Patrol and Chief of Department, with authority over NYPD command assignments, personnel decisions, supervision, discipline, and remedial action affecting plaintiff. Defendant JEFFREY B. MADDREY is sued in his official and individual capacities.

28. Defendant JOHN M. CHELL is a male and, during the relevant period, served as a senior NYPD executive, including as Chief of Patrol and later Chief of Department, with authority over NYPD operations, command assignments, personnel decisions, resources, supervision, discipline, and remedial action affecting plaintiff. Defendant JOHN M. CHELL is sued in his official and individual capacities.

29. Defendant JOSEPH E. KENNY is a male and, during the relevant period, served as a senior NYPD executive, including within the Detective Bureau and later as Chief of

Detectives, with supervisory, operational, command, and remedial authority affecting plaintiff.

Defendant JOSEPH E. KENNY is sued in his official and individual capacities.

30. Defendant MICHAEL J. LIPETRI is a male and, during the relevant period, served as a senior NYPD executive, including as Chief of Crime Control Strategies / Compstat and later Chief of Department, with operational, command, personnel, resource-allocation, supervisory, and remedial authority affecting plaintiff. Defendant MICHAEL LIPETRI is sued in his official and individual capacities.

31. At all relevant times, each individual defendant acted under color of law and within the scope of his or her employment, agency, authority, and/or apparent authority with defendant THE CITY OF NEW YORK and the NYPD.

32. At all relevant times, each individual defendant personally participated in, directed, approved, condoned, ratified, failed to correct, or continued the discriminatory, hostile, retaliatory, disciplinary, and post-employment conduct alleged herein.

BACKGROUND

A. Plaintiff's NYPD Career and Qualifications

33. Plaintiff DANIELLE E. RAIA served the New York City Police Department ("NYPD") for approximately twenty-six years.

34. During her NYPD career, plaintiff held patrol, investigative, operational, administrative, technical, and executive command assignments.

35. Plaintiff developed substantial experience in firearms investigations, confidential-informant work, search warrants, controlled buys, violent-crime investigations, domestic-violence operations, technical-response operations, and senior command.

36. Plaintiff's experience, rank, and record qualified her for the senior NYPD assignments she held during the relevant period, including assignments in Gun Violence, the Domestic Violence Unit, and the Technical Assistance and Response Unit ("TARU").

37. When plaintiff was provided fair supervision, equal authority, and adequate command support, she performed successfully.

38. Plaintiff's claims arise from the opposite treatment: when plaintiff was placed into male-controlled senior command environments, she was denied equal authority, denied equal support, bypassed by male command actors, subjected to gendered and sexualized treatment, retaliated against after complaining, removed from command, and replaced by a connected lower-ranked male successor who received resources plaintiff had been denied.

B. Gun Violence / Gun Recidivist Investigation Program

39. Beginning in or about January 2022, plaintiff DANIELLE E. RAIK served as Commanding Officer of the Gun Recidivist Investigation Program ("GRIP") within the New York City Police Department ("NYPD") Detective Bureau / Gun Violence Suppression Division.

40. The operative Gun Violence / Detective Bureau period alleged herein ran from in or about January 2022 through on or about April 12, 2023, when plaintiff filed retirement papers and her retirement running time began.

41. During the Gun Violence / Detective Bureau period, plaintiff held the rank of Deputy Inspector.

42. GRIP was physically located at 860 Remsen Avenue, Brooklyn, New York, including the main GRIP work area and the office of then-Captain Ryan J. Gillis.

43. Plaintiff was responsible for a list of approximately 300-gun recidivists, and plaintiff's GRIP team, which included approximately two undercovers, was responsible for

ensuring that those gun recidivists were not shooting, carrying firearms, or otherwise contributing to gun violence.

44. Plaintiff's GRIP assignment required firearms-investigation experience, investigative judgment, operational discretion, supervisory authority, coordination with detectives and undercovers, and the use of investigative tools including search warrants, confidential informants, controlled buys, drug-buy operations, case initiation, and related investigative steps.

45. Plaintiff was placed into Gun Violence by then-First Deputy Commissioner Edward A. Caban because Caban had observed plaintiff's firearms, investigative, and command work in Brooklyn North Borough Crime from approximately 2012 through 2014.

46. Plaintiff alleges that James W. Essig, then Chief of Detectives, did not like that Caban placed plaintiff into Gun Violence.

47. Plaintiff alleges that Essig's opposition to plaintiff's Gun Violence placement was connected to Essig's years-long conflict with Caban, plaintiff's prior success in firearms investigations, and her gender.

48. Plaintiff alleges that Essig's opposition was also consistent with earlier discriminatory treatment plaintiff experienced in Brooklyn North, where male Lieutenant Christopher Devaney was treated more favorably, male command actors made remarks about plaintiff being a woman in a man's world, and plaintiff was denied search-warrant opportunities that Devaney was able to obtain.

49. During the earlier Brooklyn North period, Essig caused Caban, then an Inspector and Executive Officer of Brooklyn North, to call plaintiff in and question why plaintiff had recovered 26 guns while another borough had recovered 40.

50. Plaintiff entered GRIP with substantial firearms-investigation experience, including approximately six years of prior work as a Field Intelligence Officer (“FIO”), extensive experience with search warrants, confidential informants, controlled buys, drug-buy operations, and firearms investigations.

51. Plaintiff’s firearms-investigation background included one of the biggest cases in or about 2009, in which approximately 150 guns were recovered and the case received media attention.

52. Plaintiff previously worked with defendant JOSEPH E. KENNY’s team when defendant KENNY was a Captain running the Firearms Investigation Unit in or about 2008.

53. Plaintiff obtained firearms for defendant KENNY’s team during that period.

54. Defendant KENNY therefore knew plaintiff’s firearms-investigation background, capabilities, prior success, and qualifications as an FIO.

55. Plaintiff also had prior history with then-Captain Craig E. Edelman from when plaintiff and Edelman were Sergeants.

56. During that earlier period, plaintiff was an FIO in the 102 Precinct, and Edelman repeatedly came in and asked plaintiff how she was obtaining firearms and conducting firearms-investigation work.

57. Plaintiff alleges that Edelman knew plaintiff was better than him at that work and knew plaintiff’s firearms-investigation capability before the Gun Violence assignment.

58. Plaintiff’s GRIP methodology relied on search warrants, confidential informants, controlled buys, drug-buy operations, firearms investigations, and case initiation.

59. Ryan J. Gillis and the Violent Reduction Task Force (“VRTF”) used a different methodology, including conspiracy-case development.

60. Plaintiff alleges that Gillis and VRTF performed valuable work, but that VRTF was afforded broad operational freedom while plaintiff's GRIP team was blocked from using plaintiff's established investigative methodology.

61. Plaintiff alleges that male command actors did not let plaintiff shine in the area where she had substantial documented expertise.

62. Plaintiff's expected duties as Commanding Officer of GRIP included command of her own team, management of her own gun-recidivist list, operational discretion over her own investigations, and the ability to make decisions consistent with her rank as Deputy Inspector.

63. In practice, plaintiff was not treated as the Commanding Officer with authority over her own team, her own list, or her own investigative decisions.

64. Plaintiff alleges that she was placed in charge of a list while her male counterpart was treated as "the king again."

65. Plaintiff was excluded from key meetings, pre-Compstat meetings, and other decision-making settings where her work, team, list, methodology, and command responsibilities were implicated.

66. Plaintiff could not make decisions with her own Gun Violence team without approval from then-Captain Craig E. Edelman or then-Captain Ryan J. Gillis.

67. Inspector Craig E. Edelman was then- Captain, Executive Officer of Gun Violence in the Detective Bureau.

68. Then-Captain Ryan J. Gillis was assigned to Gun Violence and directly supervised or controlled VRTF.

69. Plaintiff alleges that Edelman and Gillis restricted plaintiff's authority notwithstanding plaintiff's higher rank, command title, and assigned responsibility as Commanding Officer of GRIP.

70. Plaintiff alleges that Edelman had previously lost his command at the 73 Precinct in or about August 2020 and was thereafter placed into the Executive Officer position in Gun Violence.

71. Plaintiff alleges that Edelman exercised control over decisions that belonged to plaintiff as Deputy Inspector and Commanding Officer of GRIP.

72. Plaintiff alleges that Gillis's conduct was especially significant because Gillis was the same rank as or lower in rank than plaintiff and nevertheless functioned as a gatekeeper over plaintiff's search-warrant, confidential-informant, controlled-buy, drug-buy, and case-initiation decisions.

73. Plaintiff alleges that Edelman and Gillis required plaintiff to clear investigative and operational decisions through them, even though those decisions should have been within plaintiff's discretion and command authority.

74. These restricted decisions included search warrants, confidential-informant use, controlled buys, drug-buy operations, case initiation, investigative direction, and related operational steps.

75. Plaintiff alleges that the blocking by Edelman and Gillis was verbal and generally not placed in writing.

76. Plaintiff alleges that Edelman and Gillis would not dare put the blocking in email or in writing.

77. Plaintiff alleges that Edelman and Gillis shut down search warrants, controlled buys, and drug-buy proposals face-to-face in Gillis's office at 860 Remsen Avenue, in pre-Compstat meetings, and in hallway conversations.

78. Edelman told plaintiff, in substance, "I'm your boss, I am more experienced."

79. Plaintiff alleges that Edelman's statement was an assertion of improper authority over plaintiff and reflected the broader command practice of subordinating plaintiff's authority to male command actors.

80. Plaintiff alleges that Gillis was in Edelman's office with him during key conversations concerning plaintiff's restricted authority.

81. Gillis shut down drug-buy proposals brought by plaintiff's GRIP team.

82. Detective James D. Miles, then a Second Grade Detective assigned to Gun Violence / GRIP, worked closely with plaintiff, had extensive experience, and was one of the detectives whose proposed drug-buy operations were shut down by Gillis.

83. Detective Mike Civil was present for at least some of the occasions when Gillis shut down plaintiff's team's drug-buy proposals.

84. Plaintiff alleges that Detective Civil was present when plaintiff's team was shut down, even if Civil himself was not the person whose proposal was being shut down.

85. Detective Scott R. Fernan was also present for relevant portions of the Gun Violence allegations and is a corroborating witness.

86. Plaintiff alleges that the operational blocks imposed by Edelman and Gillis were known within GRIP and damaged plaintiff's authority before the detectives and undercovers she was supposed to command.

87. Detective Miles personally observed Gillis shutting down plaintiff's team's drug-buy proposals.

88. Detective Miles personally observed the pattern in which plaintiff was excluded from operational decisions.

89. Detective Miles personally observed that plaintiff's search-warrant, confidential-informant, controlled-buy, and drug-buy expertise was being disregarded.

90. Detective Miles told plaintiff, in substance, that plaintiff was being treated poorly because she was a woman and because she took care of Black and Hispanic officers, and "they" did not like it.

91. Detective Miles made that statement in the presence of Detective Scott R. Fernan and Detective Mike Civil.

92. Plaintiff alleges that Detective Miles will testify to those facts.

93. Plaintiff alleges that Detective Civil will also testify to those facts.

94. Plaintiff alleges that the Black and Hispanic detectives and undercover assigned to GRIP were aware of the operational blocks and the broader discriminatory treatment.

95. VRTF was a comparator unit operating within the same Gun Violence command environment as GRIP.

96. VRTF performed video-related work and reported within the same broader Gun Violence command structure as GRIP.

97. VRTF was directly under Gillis.

98. Plaintiff alleges that VRTF was able to conduct search warrants, drug buys, and other investigative operations that plaintiff's GRIP team was blocked from conducting.

99. Plaintiff alleges that VRTF was able to do “anything they wanted,” including search warrants and drug buys.

100. Plaintiff alleges that VRTF received operational discretion, command support, and practical freedom of action that plaintiff and GRIP did not receive.

101. Plaintiff alleges that the same male command structure that blocked plaintiff’s GRIP methodology allowed Gillis and VRTF to use investigative tools and operational latitude denied to plaintiff.

102. Plaintiff alleges that the differential treatment between GRIP and VRTF was not based upon performance, rank, experience, public-safety need, or legitimate operational judgment.

103. Plaintiff alleges that the difference was that plaintiff’s team was led by a female Deputy Inspector whose authority was being subordinated to male command actors, while VRTF was controlled by Gillis and allowed to operate freely.

104. Assistant Chief Jason A. Savino was then a one-star Chief over Gun Violence, GRIP, and VRTF.

105. Savino was supposed to be plaintiff’s immediate supervisor.

106. Instead of exercising direct supervision over plaintiff in a manner consistent with plaintiff’s rank, Savino repeatedly referred plaintiff to Gillis.

107. Savino placed an enormous amount of faith in Gillis and told plaintiff to “run it by Gillis,” or words to that effect.

108. Plaintiff alleges that Savino’s conduct had the effect of requiring a female Deputy Inspector’s operational decision to be cleared by a lower-ranked male Captain.

109. Savino also discounted plaintiff's search-warrant, confidential-informant, and controlled-buy methodology by stating, in substance, "Let me see how many guys stayed in jail with those search warrants."

110. Plaintiff alleges that Savino's statement used a post-hoc metric to discount legitimate firearms-investigation methods and plaintiff's documented expertise.

111. Plaintiff alleges that Savino's statement ignored that search warrants, confidential informants, controlled buys, and drug-buy operations were legitimate investigative tools in firearms and gun-recidivist investigations.

112. Plaintiff alleges that the two methodologies were treated differently: plaintiff's GRIP methodology using search warrants, confidential informants, controlled buys, and drug buys was blocked, while Gillis's VRTF methodology was allowed broader operational latitude.

113. Defendant KENNY, then Executive Officer of the Detective Bureau and later Chief of Detectives, was part of the Detective Bureau / Gun Violence command environment in which plaintiff was required to function.

114. Defendant KENNY repeatedly demeaned FIO experience in Detective Bureau meetings, including by stating in substance that "FIOs suck" and "FIOs are terrible."

115. Defendant KENNY also stated in substance that FIOs did not know what they were doing.

116. Defendant KENNY made those comments despite knowing plaintiff's FIO background, firearms-investigation record, prior successful firearms work, and prior assistance to his own team.

117. Plaintiff alleges that defendant KENNY said those things every chance he could.

118. James W. Essig, then Chief of Detectives, also repeatedly stated, in substance, that “FIOs suck” and “FIOs are terrible.”

119. Essig also stated in substance that FIOs did not know what they were doing.

120. These comments were made mostly during pre-Compstat meetings in the Chief of Detectives conference room at 1 Police Plaza.

121. The pre-Compstat meetings were generally held on Thursday mornings beginning at approximately 8:00 a.m.

122. The relevant comments occurred during plaintiff’s Gun Violence assignment from approximately January 2022 through March 2023.

123. Present at these meetings were, among others, Essig, defendant KENNY, Chief Timothy J. McCormack, Assistant Chief Savino, Lieutenant John Russo, who served as Essig’s administrative lieutenant, and, on at least one occasion, Edelman.

124. Plaintiff alleges that there were no women at the table during the relevant meetings.

125. Plaintiff alleges that the repeated anti-FIO comments were directed at or connected to plaintiff because the chiefs knew she had served as an FIO for approximately six years.

126. Plaintiff alleges that defendant KENNY knew very well what plaintiff was capable of because plaintiff had worked with his team when he ran the Firearms Investigation Unit.

127. Plaintiff alleges that Essig also knew plaintiff’s firearms-investigation record because Essig had been in Brooklyn North while plaintiff was producing gun arrests there.

128. Plaintiff alleges that there was no legitimate operational reason for defendant KENNY and Essig to repeatedly demean FIOs in those meetings.

129. Plaintiff alleges that the comments were absolutely directed toward plaintiff to make plaintiff feel like shit.

130. Plaintiff alleges that the comments publicly undermined plaintiff's experience in front of a male senior-command audience.

131. Plaintiff alleges that the comments were gendered in context because they occurred in the same environment where there were no women at the table, Chief Neteis T. Gilbert was mocked, plaintiff was told in substance that she was being treated poorly because she was a woman, and plaintiff directly raised the "chic" issue with Edelman and Gillis.

132. Plaintiff alleges that the repeated anti-FIO comments by defendant KENNY and Essig were not isolated remarks, but senior-command endorsement of the same discriminatory operational treatment being carried out by Edelman, Gillis, and Savino.

133. Plaintiff alleges that while Edelman, Gillis, and Savino restricted plaintiff's ability to use FIO-based investigative methods through GRIP, VRTF was afforded wide operational latitude to conduct those same categories of work.

134. Plaintiff alleges that defendant KENNY's repeated denigration of FIO experience supplied justification, cover, and command-level approval for the restriction of plaintiff's authority because plaintiff's FIO background was one of the principal qualifications that made her effective in firearms investigations.

135. Plaintiff further alleges that defendant KENNY's comments reinforced the discriminatory message that plaintiff's experience, judgment, and command authority were not

to be respected, while male-favored operational units and male command actors were afforded broader discretion and support.

136. During the Gun Violence assignment, plaintiff observed a separate gendered incident involving Deputy Chief Neteis T. Gilbert, then Executive Officer of the Detective Bureau.

137. Deputy Chief Gilbert was, upon information and belief, the highest-ranking woman in the Detective Bureau.

138. During a presentation in the 1 Police Plaza auditorium, Deputy Chief Gilbert addressed a room that plaintiff observed to be full of men.

139. Plaintiff alleges that Deputy Chief Gilbert displayed command presence during the presentation.

140. After the presentation ended and after the room had largely cleared, plaintiff stood in a small group near the back of the auditorium.

141. Present in that group were plaintiff, Deputy Inspector Patrick Cortright, Essig, Savino, and Essig's driver.

142. Deputy Inspector Cortright openly mocked Deputy Chief Gilbert's presentation, body language, gait, and speech.

143. Deputy Inspector Cortright mimicked Deputy Chief Gilbert holding a paper, walking back and forth in a sloppy manner, and making gibberish sounds such as "blah blah blah."

144. Essig laughed at Deputy Inspector Cortright's mockery.

145. Plaintiff alleges that Essig's laughter constituted endorsement by the highest-ranking officer in the Detective Bureau.

146. Savino smiled but did not actively participate in the mockery.

147. Plaintiff alleges that plaintiff did not get the sense that Savino agreed with the mockery, but Savino did not intervene.

148. Plaintiff alleges that the distinction matters because Essig, the most senior officer in the bureau, actively laughed, while Savino recognized or appeared to recognize that the conduct was inappropriate but did not stop it.

149. Plaintiff alleges that the Chief Gilbert incident reflected a broader pattern of demeaning women in the Detective Bureau.

150. Plaintiff alleges that the Chief Gilbert incident fit within the same pattern as the “no women at the table” pre-Compstat meetings, the repeated “FIOs suck” and “FIOs are terrible” comments, the “chic” exchange in Gillis’s office, and Detective Miles’s statement that plaintiff was being treated poorly because she was a woman.

151. During the Gun Violence assignment, plaintiff had a direct gender-related exchange with Edelman and Gillis in Gillis’s office at 860 Remsen Avenue.

152. Present for that exchange were plaintiff, Edelman, and Gillis.

153. Plaintiff stated, in substance and using her own words, “You guys son me because I’m a chic.”

154. Edelman responded, in substance, “Oh yea Danny. That’s why,” while rolling his eyes.

155. Gillis’s face had no reaction and Gillis did not say a word.

156. Plaintiff alleges that Gillis’s silence in the face of the gender-based exchange reflected acquiescence in the discriminatory dynamic.

157. Plaintiff alleges that after the exchange it was awkward for a bit and then went back to the status quo.

158. Plaintiff did not file a formal report about the “chic” exchange at that time.

159. Plaintiff alleges that she did not formally report the exchange because it is a sin in the Department to make complaints and plaintiff was already being treated like the black sheep.

160. Plaintiff alleges that the Edelman exchange was part of the basis for what plaintiff later told defendant JEFFREY B. MADDREY.

161. Plaintiff later told defendant MADDREY, in plaintiff’s exact words, “Even the detectives know that I can’t start a case.”

162. Plaintiff alleges that this was the closest plaintiff came at that time to escalating the “chic” exchange and the broader discriminatory operational treatment informally to defendant MADDREY.

163. Plaintiff alleges that the Gun Violence / Detective Bureau period created a command environment in which plaintiff’s authority as a female Deputy Inspector was treated as subordinate to male command preference.

164. Plaintiff alleges that women were mocked, women were not included at the table, plaintiff’s firearms-investigation expertise was publicly demeaned, plaintiff’s operational authority was routed through male command actors, and plaintiff’s team was denied investigative tools afforded to male-favored comparators.

165. Plaintiff alleges that the Gun Violence assignment became the first major liability period in the continuing pattern of gender discrimination, hostile work environment, retaliation, and aiding and abetting alleged in this action.

C. Plaintiff’s Protected Complaints to Defendant JEFFREY B. MADDREY, Retirement Filing, and Withdrawal of Retirement Papers

166. During the Gun Violence / Detective Bureau period, plaintiff complained to defendant JEFFREY B. MADDREY multiple times.

167. Defendant MADDREY was then a high-level NYPD chief, including Chief of Patrol and/or Chief of Department during relevant portions of the chronology.

168. Defendant MADDREY was above the Gun Violence assignment and had authority over plaintiff's transfer, placement, assignment, protection, and command conditions.

169. Plaintiff told defendant MADDREY three times before filing retirement papers that she needed to be moved out of Gun Violence.

170. Plaintiff does not presently recall the exact dates of all three pre-retirement complaints.

171. Two of the pre-retirement complaints occurred in defendant MADDREY's office at 1 Police Plaza.

172. One of the pre-retirement complaints occurred at Chief Martine N. Materasso's promotion party on April 6, 2023.

173. Each time, plaintiff told defendant MADDREY, in substance, "I have to get out of there. It is terrible."

174. Defendant MADDREY responded, in substance, "OK."

175. Defendant MADDREY did not follow up.

176. Defendant MADDREY did not investigate.

177. Defendant MADDREY did not take meaningful corrective action.

178. Plaintiff told defendant MADDREY the full substance of the discriminatory and hostile environment.

179. Plaintiff told defendant MADDREY that the environment was racist.

180. Plaintiff told defendant MADDREY that the environment was a hostile work environment.

181. Plaintiff told defendant MADDREY that the treatment included “the women reason.”

182. Plaintiff told defendant MADDREY “all of the above.”

183. Plaintiff alleges that defendant MADDREY knew plaintiff was complaining about discrimination, hostile work environment, gender-based treatment, race-related hostility, and retaliatory command conditions.

184. Plaintiff alleges that defendant MADDREY’s pattern with plaintiff was to put plaintiff into commands where he claimed plaintiff could change discriminatory cultures while failing to support plaintiff when the discriminatory actors resisted her authority.

185. Plaintiff alleges that defendant MADDREY did this in the Detective Bureau / Gun Violence context.

186. Plaintiff alleges that defendant MADDREY later did this again in the Technical Assistance and Response Unit (“TARU”) context, where defendant MADDREY told plaintiff in his office at 1 Police Plaza that the Detective Bureau, Intelligence, and TARU were racist to plaintiff and that he was putting plaintiff in TARU to change the culture.

187. Plaintiff alleges that she brought Black and Hispanic officers into TARU and that “they” did not like it.

188. Plaintiff alleges that defendant MADDREY put plaintiff into positions to change things, but did not help much.

189. Defendant MADDREY did not investigate plaintiff’s complaints.

190. Defendant MADDREY did not back plaintiff up against the people creating the environment.

191. Defendant MADDREY left plaintiff to absorb the cost of the assignments while the actors continued without consequence.

192. Plaintiff previously complained to defendant MADDREY about conduct by Larin, including Larin's "half on a baby" comment.

193. Plaintiff framed Larin's conduct to defendant MADDREY as hostile work environment and sexual harassment.

194. When plaintiff complained to defendant MADDREY about Larin's conduct, defendant MADDREY responded, in substance, "Wow, he is mad because you won't give him tail."

195. Plaintiff alleges that defendant MADDREY's response trivialized plaintiff's complaint, sexualized the issue, and demonstrated defendant MADDREY's unwillingness to treat plaintiff's gender-based and sexual-harassment concerns with seriousness.

196. In or about early March 2023, approximately one month before Chief Martine N. Materasso's April 6, 2023 promotion party, plaintiff went to defendant MADDREY's office at 1 Police Plaza and asked to be moved out of Gun Violence.

197. This complaint occurred during plaintiff's Gun Violence assignment.

198. This complaint occurred during a meeting involving citywide homeless outreach.

199. Present in defendant MADDREY's office during the visit were defendant MADDREY; Three-Star Chief Miguel Iglesias, then Chief of Internal Affairs; defendant JOHN M. CHELL; defendant KAZ DAUGHTRY; and Inspector Theodore Fedoroff, now Chief Theodore Fedoroff, who was in and out of the office.

200. Plaintiff was in defendant MADDREY's office to see defendant MADDREY.

201. Plaintiff made the substance of her request quietly to defendant MADDREY.

202. Plaintiff made the request quietly because defendant CHELL was a huge fan of then-Captain Craig E. Edelman and plaintiff understood defendant CHELL and Edelman to be very tight.

203. Plaintiff did not openly name Edelman in front of the room because plaintiff feared the consequences of doing so in front of defendant CHELL.

204. Plaintiff told defendant MADDREY she needed to go.

205. Defendant MADDREY responded, in substance, "No, we have a position in mind for you."

206. The position defendant MADDREY referenced was citywide homeless outreach working with Timmy Pearson.

207. Plaintiff did not want the citywide homeless outreach assignment.

208. Plaintiff did not want the citywide homeless outreach assignment because it was technically not a uniform assignment, required leaving the bureau, and involved Pearson.

209. Plaintiff told defendant MADDREY she really did not want the citywide homeless outreach assignment.

210. During the same office visit, defendant MADDREY and other senior NYPD executives discussed an incident involving Mayor Eric Adams at Gracie Mansion.

211. The discussion concerned Mayor Adams allegedly becoming upset, chopping his food harder, and stating, in substance, "You motherfuckers are colluding against me."

212. The senior executives in defendant MADDREY's office laughed about the incident.

213. Plaintiff alleges that they treated the Mayor's statement as a big joke.

214. After the laughter stopped, defendant CHELL turned to plaintiff and stated, in substance, "See Danielle Raia? There's no secrets here. There are no secrets here, Danielle Raia."

215. Plaintiff alleges that defendant CHELL's statement was directed at plaintiff by name.

216. Plaintiff alleges that defendant CHELL made the statement in the presence of defendant MADDREY, Three-Star Chief Iglesias, defendant DAUGHTRY, and Inspector Fedoroff.

217. Plaintiff alleges that the back of her hair stood up when defendant CHELL made the statement.

218. Plaintiff understood defendant CHELL's statement as a direct signal that whatever plaintiff said in that room, including complaints about Gun Violence, would not be confidential.

219. Plaintiff understood defendant CHELL to be telling plaintiff that complaints made in that senior-command setting would not remain confidential.

220. Plaintiff alleges that defendant CHELL made that statement in front of the Chief of Internal Affairs, defendant MADDREY, defendant DAUGHTRY, and Inspector Fedoroff.

221. Plaintiff alleges that defendant CHELL's statement chilled plaintiff's willingness to complain openly.

222. Plaintiff alleges that defendant CHELL's statement reinforced plaintiff's fear that complaints about male command actors would be exposed, minimized, or retaliated against.

223. Plaintiff alleges that Iglesias, defendant CHELL, defendant DAUGHTRY, and Inspector Fedoroff were physically present in the office during the visit.

224. Plaintiff alleges that those in-room executives were present while plaintiff was there asking to be moved.

225. Plaintiff alleges that those in-room executives were present when defendant MADDREY countered with the citywide homeless outreach role working with Pearson.

226. Plaintiff alleges that those in-room executives were present when defendant CHELL delivered the “no secrets here” line to plaintiff by name.

227. Plaintiff alleges that the in-room executives did not hear the full substance of plaintiff’s quiet request to defendant MADDREY.

228. Plaintiff alleges that the in-room executives did not hear plaintiff’s quiet identification of Edelman as part of the problem.

229. Plaintiff alleges that plaintiff had to be quiet about Edelman because defendant CHELL was a huge fan of Edelman and they were very tight.

230. Plaintiff alleges that defendant MADDREY did not address the Gun Violence environment during or after this complaint.

231. Defendant MADDREY did not move plaintiff out of Gun Violence after this complaint.

232. Defendant MADDREY did not initiate any meaningful investigation after this complaint.

233. Defendant MADDREY did not correct Edelman.

234. Defendant MADDREY did not correct then-Captain Ryan J. Gillis.

235. Defendant MADDREY did not correct Assistant Chief Jason A. Savino's practice of routing plaintiff's decisions through Gillis.

236. Defendant MADDREY did not address defendant JOSEPH E. KENNY's and James W. Essig's repeated anti-FIO comments.

237. Defendant MADDREY did not provide plaintiff with any anti-retaliation protection after this complaint.

238. Plaintiff later complained again to defendant MADDREY in defendant MADDREY's office at 1 Police Plaza.

239. This second office complaint was distinct from the early March 2023 complaint involving the citywide homeless outreach meeting.

240. During the second office complaint, plaintiff again told defendant MADDREY, in substance, "I have to get out of there. It is terrible."

241. Defendant MADDREY responded, in substance, "OK."

242. Defendant MADDREY took no meaningful corrective action.

243. On April 6, 2023, plaintiff complained to defendant MADDREY for a third time at Chief Martine N. Materasso's promotion party.

244. Defendant MADDREY was leaving Chief Materasso's promotion party when plaintiff caught him on his way out.

245. Plaintiff told defendant MADDREY, in substance, "I'm losing my shit. Please get me out of there."

246. Defendant MADDREY responded, in substance, "OK."

247. Defendant MADDREY again took no meaningful corrective action.

248. Six days later, on or about April 12, 2023, plaintiff filed retirement papers.

249. Plaintiff alleges that she filed retirement papers because no one was listening.

250. Plaintiff alleges that she filed retirement papers because the Gun Violence environment had become intolerable.

251. Plaintiff alleges that the Gun Violence command environment had operated as a constructive push toward retirement.

252. Plaintiff's retirement filing was documented in an NYPD FINEST message dated April 12, 2023, Daily Sheet Log No. 23-73, SER No. 42853453.

253. The FINEST message identified plaintiff as "DI. RAIA, DANIELLE E. 924370 GVSD."

254. The FINEST message listed plaintiff's terminal leave date as June 1, 2023.

255. The FINEST message listed plaintiff's effective retirement date as July 31, 2023.

256. The FINEST message was distributed to all commands.

257. Plaintiff alleges that because the FINEST message went to all commands, the Department's chiefs and commands were on notice of plaintiff's retirement filing as of April 12, 2023.

258. Assistant Chief Savino signed plaintiff's retirement papers.

259. Plaintiff did not state on the retirement paperwork that she was retiring because of discrimination, hostile work environment, the "women reason," racism, retaliation, or gender-based treatment.

260. Plaintiff told the Department that she was retiring because of a family issue.

261. Plaintiff alleges that the family-issue explanation was false.

262. Plaintiff alleges that she gave the false family-issue explanation because she feared retaliation if she placed the true reason on paper.

263. Plaintiff alleges that the same people she would have been accusing, including Essig, Edelman, Gillis, Savino, defendant KENNY, and other chiefs around them, were within or connected to the chain that would process or react to her retirement filing.

264. Plaintiff alleges that she reasonably feared that stating “discrimination,” “hostile work environment,” “the women reason,” racism, or retaliation on the way out would give the Department a reason to harm her before she left.

265. Plaintiff privately told defendant MADDREY the substance of the true reason for her retirement filing.

266. Plaintiff did not tell other Department members the true reason for the retirement filing at the time.

267. Plaintiff’s mother knew why plaintiff was retiring and knew the underlying conduct plaintiff had described.

268. Plaintiff’s fiancé, Jorge Gutierrez, also knew the underlying conduct in real time.

269. Plaintiff alleges that Jorge Gutierrez is a non-Department lay witness to what plaintiff reported contemporaneously and to how the Department’s conduct affected plaintiff.

270. Plaintiff alleges that she was fearful to tell even friends what was happening because many of them were connected to members of the Department and plaintiff did not want information to get back to the Department.

271. Plaintiff alleges that the small outside-witness pool reflects fear of retaliation, not the absence of discriminatory or hostile treatment.

272. On June 2, 2023, after plaintiff’s retirement papers had been filed, plaintiff again spoke with defendant MADDREY at Russo’s on the Bay.

273. Defendant MADDREY's driver, Detective Jonathon Dorrejo, called plaintiff over.

274. During the June 2, 2023 conversation, defendant MADDREY asked plaintiff, in substance, "What happened?"

275. Plaintiff told defendant MADDREY, in substance, "I asked you several times to move me because I was going to lose my fuckin job at Gun Violence."

276. Plaintiff further told defendant MADDREY that Edelman had stated, in substance, "I'm your boss, I am more experienced."

277. Plaintiff further told defendant MADDREY that male command actors were making sure plaintiff was not at the table for decisions.

278. Plaintiff further told defendant MADDREY the substance of what she had already been trying to explain about the Gun Violence environment.

279. Defendant MADDREY responded, in substance, "You didn't explain it like that."

280. Plaintiff responded, in substance, "Yes I did, you weren't listening."

281. Defendant MADDREY then told plaintiff to pull her retirement papers because he had something for her.

282. Defendant MADDREY did not place that statement or any remedial plan in writing.

283. Plaintiff relied upon defendant MADDREY's statement.

284. Plaintiff withdrew her retirement papers on or about June 9, 2023.

285. Plaintiff alleges that defendant MADDREY was the only person who encouraged plaintiff to withdraw her retirement papers.

286. Plaintiff alleges that defendant MADDREY offered plaintiff the Executive Officer position in the Domestic Violence Unit under Assistant Melissa A. Eger.

287. Defendant MADDREY thereafter placed plaintiff into the Domestic Violence Unit.

288. Plaintiff alleges that the Domestic Violence Unit placement was defendant MADDREY's response to plaintiff's complaints, but it did not constitute meaningful remediation of the discriminatory and hostile Gun Violence command environment.

289. Plaintiff alleges that the Domestic Violence Unit placement was not punitive.

290. Plaintiff alleges that Gun Violence had already operated as a constructive push toward retirement before plaintiff was moved to Domestic Violence.

291. Defendant MADDREY did not investigate plaintiff's complaints.

292. Defendant MADDREY did not discipline or correct Edelman.

293. Defendant MADDREY did not discipline or correct Gillis.

294. Defendant MADDREY did not correct Savino's routing of plaintiff's decisions through Gillis.

295. Defendant MADDREY did not address defendant KENNY's or Essig's repeated anti-FIO comments.

296. Defendant MADDREY did not address the gendered culture reflected in the Deputy Chief Neteis T. Gilbert mocking incident.

297. Defendant MADDREY did not address the "chic" exchange involving Edelman and Gillis.

298. Defendant MADDREY did not provide plaintiff with a written finding, written resolution, remedial protection, anti-retaliation protection, or command-level correction.

299. Plaintiff alleges that defendant MADDREY's response merely moved plaintiff away from the immediate Gun Violence environment after plaintiff had already been constructively pushed into filing retirement papers.

300. Plaintiff alleges that defendant MADDREY's response shifted the burden of the discriminatory and hostile environment onto plaintiff while leaving the male command actors uncorrected.

301. Plaintiff alleges that plaintiff's complaints to defendant MADDREY constituted protected activity under the New York State Human Rights Law ("NYSHRL") and the New York City Human Rights Law ("NYCHRL").

302. Plaintiff alleges that defendants' failure to remediate, plaintiff's constructive push toward retirement, and the later assignments and retaliatory consequences flowed from plaintiff's protected complaints and opposition to discriminatory and hostile treatment.

D. Domestic Violence Unit / Control Period Showing Plaintiff's Competence and Gendered Assignment Tracking

303. After plaintiff withdrew her retirement papers on or about June 9, 2023, defendant JEFFREY B. MADDREY placed plaintiff into the New York City Police Department ("NYPD") Domestic Violence Unit.

304. Plaintiff served as Executive Officer of the Domestic Violence Unit from in or about June 2023 through in or about October 2023.

305. Plaintiff reported to Assistant Chief Melissa A. Eger, then the Commanding Officer of the Domestic Violence Unit.

306. Plaintiff alleges that Chief Eger was a fair supervisor and treated plaintiff with the respect due to plaintiff's rank, experience, investigative background, and command position.

307. Plaintiff alleges that the Domestic Violence Unit period was the only stretch of the relevant period when plaintiff was not on guard and felt supported.

308. Plaintiff's duties in the Domestic Violence Unit included reviewing cases, assisting with Domstat preparation, handling meetings, working with command staff, and using her investigative background to support the unit.

309. Plaintiff handled meetings and command-staff responsibilities without improper direction, gatekeeping, or micromanagement.

310. Plaintiff performed effectively in the Domestic Violence Unit.

311. Chief Eger repeatedly told plaintiff that she was grateful for plaintiff's investigative background.

312. Chief Eger had detectives consult with plaintiff and bounce investigative issues off plaintiff.

313. Chief Eger treated plaintiff as part of the Domestic Violence Unit command team.

314. Plaintiff alleges that Chief Eger valued plaintiff's investigative experience, judgment, leadership, and command presence.

315. During plaintiff's Domestic Violence Unit assignment, plaintiff was not subjected to claims of misconduct, disciplinary charges, anonymous letters, surveillance, Internal Affairs Bureau activity, or Internal Affairs Bureau escalation.

316. During plaintiff's Domestic Violence Unit assignment, plaintiff was not subjected to the type of lower-ranked male gatekeeping plaintiff experienced in Gun Violence.

317. During plaintiff's Domestic Violence Unit assignment, plaintiff was not required to route her command decisions through a lower-ranked male Captain.

318. During plaintiff's Domestic Violence Unit assignment, plaintiff was not excluded from command discussions in the same manner she had been excluded in Gun Violence.

319. Plaintiff alleges that the Domestic Violence Unit period is a relevant control period because it shows that plaintiff performed effectively when she was supervised fairly and treated consistently with her rank.

320. Plaintiff alleges that the Domestic Violence Unit period confirms that plaintiff's problems in Gun Violence were not caused by plaintiff's competence, work ethic, judgment, investigative background, leadership ability, or command presence.

321. Plaintiff alleges that the Domestic Violence Unit period instead confirms that plaintiff could perform successfully when she was not subjected to discriminatory command interference, gender-based undermining, and retaliatory gatekeeping.

322. Chief Eger was sufficiently satisfied with plaintiff's work that she met with defendant MADDREY and praised plaintiff's performance.

323. During that meeting, Chief Eger told defendant MADDREY that she was very happy with plaintiff's work.

324. During that meeting, Chief Eger suggested that plaintiff be kept in the Domestic Violence Unit or otherwise placed well.

325. Defendant MADDREY responded, in substance, that he had plans for plaintiff.

326. Chief Eger later told plaintiff about her meeting with defendant MADDREY and his statement that he had plans for plaintiff.

327. Plaintiff alleges that Chief Eger is a material witness to plaintiff's competence, leadership, investigative value, command presence, and successful performance during the Domestic Violence Unit assignment.

328. Plaintiff alleges that Chief Eger is also a material witness to defendant MADDREY's statement that he had plans for plaintiff before plaintiff was placed into the Technical Assistance and Response Unit ("TARU").

329. Plaintiff alleges that defendant MADDREY's placement of plaintiff into the Domestic Violence Unit did not constitute meaningful remediation of the discriminatory and hostile Gun Violence command environment.

330. Defendant MADDREY did not investigate plaintiff's Gun Violence complaints.

331. Defendant MADDREY did not discipline or correct then-Captain Craig E. Edelman.

332. Defendant MADDREY did not discipline or correct then-Captain Ryan J. Gillis.

333. Defendant MADDREY did not correct Assistant Chief Jason A. Savino's practice of routing plaintiff's operational decisions through Gillis.

334. Defendant MADDREY did not address defendant JOSEPH E. KENNY's or James W. Essig's repeated denigration of Field Intelligence Officer experience.

335. Defendant MADDREY did not address the gendered culture reflected in the Deputy Chief Neteis T. Gilbert mocking incident.

336. Defendant MADDREY did not address the "chic" exchange involving Edelman and Gillis.

337. Defendant MADDREY did not provide plaintiff with a written finding, written resolution, remedial protection, anti-retaliation protection, or command-level correction relating to plaintiff's Gun Violence complaints.

338. Plaintiff alleges that the Domestic Violence Unit placement moved plaintiff away from the immediate Gun Violence environment but left the discriminatory and hostile command practices uncorrected.

339. Plaintiff alleges that the Domestic Violence Unit placement shifted the burden of the discriminatory Gun Violence environment onto plaintiff while leaving the male command actors uncorrected.

340. Plaintiff does not allege that domestic-violence work is unimportant.

341. Domestic-violence work is an important public-safety function.

342. Plaintiff alleges, however, that within the NYPD's senior-command culture, domestic violence, housing, transit, community-facing, administrative, and similar assignments have historically been treated as less operationally prestigious and less promotion-enhancing than high-visibility firearms, violent-crime, intelligence, technical, enforcement, and citywide operational commands.

343. Plaintiff alleges that those less promotion-enhancing tracks are disproportionately assigned to women, Black officers, Hispanic officers, other persons of color, and other non-favored executives.

344. Plaintiff alleges that high-visibility operational commands are more often assigned to white male executives and male-favored command actors.

345. Plaintiff alleges that plaintiff's movement from Gun Violence into the Domestic Violence Unit after her protected complaints fits this gendered and race-associated assignment-tracking pattern.

346. Plaintiff alleges that the Domestic Violence Unit placement was not punitive in the sense that Chief Eger mistreated plaintiff.

347. Plaintiff alleges that Chief Eger treated plaintiff fairly and valued plaintiff's work.

348. Plaintiff alleges that the legal significance of the Domestic Violence Unit period is twofold: first, it shows plaintiff's competence when supervised fairly; second, it shows that instead of correcting the discriminatory male-controlled Gun Violence environment, defendant MADDREY moved plaintiff into a traditionally gendered assignment while leaving the male actors uncorrected.

349. Plaintiff alleges that the Domestic Violence Unit period is important not because plaintiff performed poorly, but because plaintiff performed well.

350. Plaintiff alleges that the Domestic Violence Unit period shows the contrast between fair supervision by Chief Eger and the discriminatory, hostile, male-controlled command environments plaintiff experienced in Gun Violence and later TARU.

351. Plaintiff alleges that when plaintiff had fair supervisors, including Chief Eger in the Domestic Violence Unit and Edward A. Caban during plaintiff's earlier Brooklyn North Borough Crime period, plaintiff's work was strong, valued, and effective.

352. Plaintiff alleges that this control period is evidence that the later criticism, surveillance, disciplinary escalation, and removal from TARU were not caused by plaintiff's inability to perform senior command work, but by discrimination, retaliation, selective enforcement, and the Department's failure to protect plaintiff after her protected complaints.

E. Technical Assistance and Response Unit / First Female Commanding Officer / Denial of Executive Officer, Personnel, and Equal Command Support

353. In or about October 2023, defendant JEFFREY B. MADDREY placed plaintiff into the Technical Assistance and Response Unit ("TARU").

354. Plaintiff served as Commanding Officer of TARU from in or about October 2023 through on or about September 12, 2025.

355. Plaintiff held the rank of Inspector while serving as Commanding Officer of TARU.

356. Plaintiff was the first female Commanding Officer of TARU.

357. Plaintiff alleges that she was the first female Commanding Officer ever assigned to command TARU.

358. Plaintiff alleges, in plaintiff's own words, that she was the first female Commanding Officer of TARU and "it wasn't what the good ol boys wanted."

359. TARU was a citywide technical command responsible for technical, video, drone, camera, surveillance, Drone-as-First-Responder, rooftop-drone, beach-safety-drone, and other technology-related operational support throughout New York City.

360. Plaintiff alleges that TARU was a high-visibility, citywide operational command.

361. Plaintiff alleges that TARU was not a routine administrative assignment.

362. Plaintiff alleges that TARU required operational judgment, technical literacy, field command presence, staffing support, citywide coordination, and senior-command backing.

363. Plaintiff alleges that defendant MADDREY selected plaintiff for TARU.

364. Around the time plaintiff was being placed into TARU, defendant MADDREY spoke with plaintiff in his office at 1 Police Plaza.

365. During that conversation, defendant MADDREY told plaintiff, in substance, that the Detective Bureau, Intelligence, and TARU were racist to plaintiff.

366. Defendant MADDREY further told plaintiff, in substance, that he was placing plaintiff into TARU to change the culture.

367. Plaintiff alleges that defendant MADDREY's statement was an admission by a senior NYPD executive that the Department was placing plaintiff into another discriminatory command environment.

368. Plaintiff alleges that defendant MADDREY knew TARU had a discriminatory culture before he placed plaintiff there.

369. Plaintiff alleges that defendant MADDREY placed plaintiff into TARU to change the culture, but failed to provide plaintiff with the Executive Officer, personnel, brass-level protection, and command support necessary to accomplish that assignment.

370. Plaintiff alleges that defendant MADDREY's statement also confirmed the continuity between plaintiff's Gun Violence / Detective Bureau complaints and the later TARU assignment.

371. Plaintiff alleges that defendant MADDREY wanted to keep plaintiff in the Detective Bureau to help with discrimination there, but plaintiff was absolutely powerless in the Detective Bureau because male command actors had stripped plaintiff of actual operational authority.

372. Plaintiff alleges that TARU became the next setting where plaintiff was expected to confront discriminatory culture without the institutional backing needed to succeed.

373. Plaintiff alleges that after being placed into TARU, plaintiff brought Black and Hispanic officers into TARU.

374. Plaintiff alleges that she brought Black and Hispanic officers into TARU on her own accord.

375. Plaintiff alleges that she has fought for Black and Hispanic officers throughout her career.

376. Plaintiff alleges that the Department's male-controlled command environment did not like plaintiff bringing Black and Hispanic officers into TARU.

377. Plaintiff alleges that TARU Sergeant Nicholas Gravino told plaintiff in plaintiff's TARU office, in words to this effect, "You have a history of taking care of minorities."

378. Plaintiff alleges that Sergeant Gravino is a living percipient witness to plaintiff's reputation for supporting minority officers and to that statement being made inside TARU during the relevant period.

379. Plaintiff alleges that Sergeant Gravino's statement reflected a known Department perception that plaintiff supported Black and Hispanic officers and that this support was disfavored by certain command actors.

380. Plaintiff alleges that this was not a new pattern.

381. Plaintiff alleges that Detective James D. Miles had previously told plaintiff during the Gun Violence assignment, in substance, that plaintiff was being treated poorly because she was a woman and because she took care of Black and Hispanic officers.

382. Plaintiff alleges that the later TARU treatment continued the same pattern of hostility to plaintiff's gender and plaintiff's support for Black and Hispanic officers.

383. Defendant MADDREY remained above TARU as Chief of Department during material portions of plaintiff's TARU assignment.

384. Plaintiff alleges that defendant MADDREY did not remain substantively engaged with TARU's operational needs after placing plaintiff there.

385. At a protest in Manhattan, near Columbus Circle, defendant MADDREY spoke to plaintiff while sitting in his vehicle.

386. During that conversation, defendant MADDREY told plaintiff, in substance and using his own words, “I can’t deal with the nerd shit. Kaz is your direct supervisor.”

387. Plaintiff alleges that defendant MADDREY referred to TARU’s technical work as “nerd shit.”

388. Plaintiff alleges that TARU’s work included drones, surveillance, Drone-as-First-Responder, and technical-investigative operations.

389. Plaintiff alleges that defendant MADDREY’s statement reflected his unwillingness to engage with the substance of TARU’s operational needs.

390. Plaintiff alleges that defendant MADDREY handed plaintiff off to defendant KAZ DAUGHTRY as plaintiff’s direct supervisor.

391. Defendant DAUGHTRY was Deputy Commissioner of Operations.

392. Plaintiff understood the Deputy Commissioner of Operations position to be a made-up spot created for defendant DAUGHTRY.

393. Plaintiff alleges that defendant DAUGHTRY’s role over TARU was an ad hoc supervisory layer that did not exist in the same form during plaintiff’s male predecessor’s tenure.

394. Plaintiff alleges that plaintiff’s direct supervisor held a position the Department had to invent.

395. Plaintiff alleges that plaintiff’s male predecessor, Inspector Frank DiGiacomo, ran TARU during a period when this Deputy-Commissioner-of-Operations layer did not exist in the same form.

396. Plaintiff alleges that her male successor, Deputy Inspector Kevin R. Cain, received a Captain-level Executive Officer on the same Personnel Order that moved Cain into TARU.

397. Plaintiff alleges that decisions about plaintiff's Executive Officer, personnel, and operational deployment flowed through defendant DAUGHTRY's ad hoc layer rather than through an established, documented supervisory chain.

398. Plaintiff alleges that the Department used silence as denial, verbal communication, no paper trail, and off-premises decision-making to avoid creating formal denial documents regarding plaintiff's Executive Officer and personnel requests.

399. Although defendant DAUGHTRY was plaintiff's direct supervisor on paper and by defendant MADDREY's own statement, plaintiff alleges that the operational chain that controlled plaintiff's command did not match the formal organizational chart.

400. Plaintiff alleges that defendant JOHN M. CHELL and defendant DAUGHTRY were inseparable at Manhattan scenes.

401. Plaintiff alleges that defendant CHELL and defendant DAUGHTRY made decisions together.

402. Plaintiff alleges that defendant CHELL directed plaintiff at many scenes, including where to go and what to do.

403. Plaintiff alleges that defendant CHELL directed plaintiff even though TARU's formal reporting was to defendant DAUGHTRY under defendant MADDREY's Columbus Circle statement.

404. Plaintiff alleges that Tarik Sheppard was often with defendant CHELL and defendant DAUGHTRY at these scenes.

405. Plaintiff alleges that many on-scene decisions controlling plaintiff and TARU personnel were made behind the scenes between defendant DAUGHTRY and defendant CHELL, with Sheppard alongside.

406. These decisions included where plaintiff and TARU personnel were deployed, what TARU personnel did, and which TARU capabilities were used.

407. These TARU capabilities included cameras, drones, Drone-as-First-Responder, and payloads.

408. Plaintiff alleges that the same group — defendant DAUGHTRY, defendant CHELL, and Sheppard — controlled or stayed silent on plaintiff's Executive Officer and personnel requests.

409. Plaintiff alleges that the denial by silence concerning plaintiff's Executive Officer and the refusal to backfill the Drone Team drawdown occurred inside that same operational circle.

410. Plaintiff alleges that the same DAUGHTRY-CHELL-Sheppard grouping was publicly identified outside this case as a tight operational unit at the relevant time.

411. Plaintiff alleges that, in her experience inside TARU, defendant CHELL directed plaintiff at scenes, decisions were made between defendant DAUGHTRY and defendant CHELL with Sheppard alongside, and the real operating chain did not match the formal chart.

412. Plaintiff alleges that defendant CHELL was not a fan of plaintiff.

413. Plaintiff alleges that defendant CHELL's gender-based animus toward plaintiff was connected, in part, to plaintiff's refusal to embrace the drone company Skydio.

414. Plaintiff believed Skydio was very shady.

415. Plaintiff believed the things Skydio was doing were not on the level.

416. Plaintiff believed Skydio did things in an improper way.

417. Plaintiff expressed those concerns at a meeting.

418. Plaintiff alleges that when plaintiff expressed those concerns, defendant CHELL was not happy with plaintiff.

419. Plaintiff alleges that defendant CHELL ignored plaintiff's concerns.

420. Plaintiff alleges that defendant DAUGHTRY also stated in the same meeting that defendant DAUGHTRY did not care for Skydio.

421. Plaintiff alleges that defendant CHELL tolerated defendant DAUGHTRY's same or similar view.

422. Plaintiff alleges that when plaintiff expressed the Skydio concern, plaintiff could see the disdain on defendant CHELL's face.

423. Plaintiff alleges that defendant CHELL displayed disdain toward plaintiff, the female Commanding Officer of TARU, even though defendant DAUGHTRY voiced similar concerns in the same meeting.

424. Plaintiff alleges that the same concern was voiced by plaintiff's own direct supervisor, defendant DAUGHTRY, but defendant CHELL's disdain was directed at plaintiff.

425. Plaintiff alleges that this was direct, named animus from defendant CHELL toward plaintiff.

426. Plaintiff alleges that defendant CHELL was a chief who co-directed plaintiff at scenes alongside defendant DAUGHTRY and Sheppard.

427. Plaintiff alleges that defendant CHELL's hostility crystallized around a specific operational disagreement in which plaintiff, as TARU Commanding Officer, raised concerns about a drone vendor's conduct.

428. Plaintiff alleges that Skydio had ties with some federal offices and that this is why Skydio would continue to be a vendor for the NYPD with drones.

429. Plaintiff alleges, upon information and belief, that there was very shady business going on with Skydio and that defendant DAUGHTRY, defendant CHELL, and Sheppard were explicitly connected to it.

430. Plaintiff alleges that defendant CHELL traveled to Las Vegas with head people from Skydio.

431. Plaintiff alleges that, apparently, defendant CHELL had dinner with Skydio leadership and made some kind of agreement.

432. Plaintiff alleges that defendant CHELL went to Las Vegas with Melanie, who plaintiff understood to be a leading Skydio representative.

433. Plaintiff alleges that Melanie was responsible for sales and push at Skydio.

434. Plaintiff does not presently know Melanie's last name.

435. Plaintiff alleges that Retired Deputy Inspector Michael Gulinello told plaintiff about the Las Vegas meeting.

436. Plaintiff alleges that Gulinello is the source for plaintiff's allegation concerning the Las Vegas dinner and the "some kind of agreement" statement.

437. Plaintiff alleges that where plaintiff previously described this as something she overheard, the more precise account is that Gulinello told plaintiff directly.

438. Plaintiff alleges that Gulinello was heavily invested in Skydio operations with defendant CHELL and defendant DAUGHTRY.

439. Plaintiff alleges that the Las Vegas dinner was a specific, off-Department-premises meeting between defendant CHELL and the leadership of the same vendor whose conduct plaintiff had flagged in an internal meeting.

440. Plaintiff did not personally witness the agreement.

441. Plaintiff alleges that Gulinello, now retired, is a named, identifiable source.
442. Plaintiff alleges that Gulinello was not a bystander to the Skydio relationship but was part of it.
443. Plaintiff alleges that plaintiff was the TARU Commanding Officer who would not embrace Skydio.
444. Plaintiff alleges that defendant CHELL had personally traveled to meet with the vendor plaintiff was flagging and reached an understanding with them.
445. Plaintiff alleges that one member of the DAUGHTRY-CHELL-Sheppard trio, defendant CHELL, traveled to Las Vegas with Skydio leadership and reached an understanding there.
446. Plaintiff alleges that Retired Deputy Inspector Michael Gulinello and Sergeant Special Assignment Richard Nayrog were heavily invested in Skydio operations at the time with defendant CHELL and defendant DAUGHTRY.
447. Plaintiff alleges that Gulinello and Nayrog were not in the formal TARU chain of command, but were heavily invested in Skydio operations alongside the same CHELL-DAUGHTRY circle that was directing plaintiff at scenes and that plaintiff had raised Skydio integrity concerns about.
448. Plaintiff alleges that Gulinello and Nayrog can be located through Department personnel records.
449. Plaintiff alleges that Drone-as-First-Responder flight logs, Skydio platform user accounts, training sign-in sheets, rooftop drone deployment orders, and beach-safety drone payload records should reflect Gulinello and Nayrog's names if they were heavily invested in Skydio operations with defendant CHELL and defendant DAUGHTRY.

450. Plaintiff alleges that the same principals — defendant DAUGHTRY, defendant CHELL, and Sheppard — were explicitly connected to the Skydio vendor relationship plaintiff raised concerns about.

451. Plaintiff alleges that the chiefs co-directing plaintiff at scenes were the same people connected to the vendor controversy.

452. Plaintiff alleges that plaintiff was raising integrity concerns about a vendor that the DAUGHTRY-CHELL-Sheppard circle was explicitly connected to.

453. Plaintiff's immediate male predecessor as TARU Commanding Officer was Inspector Frank DiGiacomo.

454. Inspector DiGiacomo had an Executive Officer, Lashonda Dice.

455. Plaintiff alleges that Inspector DiGiacomo had an Executive Officer and the pre-drawdown TARU headcount.

456. Plaintiff repeatedly requested an Executive Officer while serving as TARU Commanding Officer.

457. Plaintiff requested an Executive Officer from defendant MADDREY, defendant DAUGHTRY, and defendant CHELL at least three or four times.

458. Plaintiff does not presently recall the exact dates of each request.

459. Plaintiff alleges that defendant MADDREY, defendant DAUGHTRY, had full authority to provide plaintiff with an Executive Officer.

460. Plaintiff alleges that defendant DAUGHTRY had full authority because defendant MADDREY identified defendant DAUGHTRY as plaintiff's direct supervisor at Columbus Circle.

461. Plaintiff alleges that defendant CHELL was in the operational chain above TARU as Chief of Patrol.

462. Plaintiff alleges that no one said no out loud.

463. Plaintiff alleges that the answer was silence.

464. Plaintiff alleges that no one said yes.

465. Plaintiff alleges that no one said when.

466. Plaintiff alleges that the request would land and then nothing would happen.

467. Plaintiff alleges that defendant DAUGHTRY's silence was the most operationally significant because defendant DAUGHTRY was plaintiff's direct supervisor by defendant MADDREY's own words.

468. Plaintiff alleges that the silence by defendant MADDREY, defendant DAUGHTRY, and defendant CHELL constituted denial by silence.

469. Plaintiff alleges that Deputy Chief Paul J. Saraceno and plaintiff interviewed two candidates for the TARU Executive Officer position during plaintiff's tenure as TARU Commanding Officer.

470. One of the two candidates interviewed was Captain Manuel A. Cabrera.

471. Plaintiff alleges that she sat with a chief and conducted formal interviews for the Executive Officer position.

472. Neither candidate was assigned to plaintiff as TARU Executive Officer.

473. Plaintiff alleges that either the interviews were a charade or the chain of command stepped in between the interview and the assignment.

474. Plaintiff alleges that the denial of an Executive Officer caused operational harm.

475. Plaintiff needed an Executive Officer for parades, protests, meetings, beach detail, rooftop drone operations, Drone-as-First-Responder, coverage of nights, weekends, sick days, vacations, simultaneous events, and other citywide TARU responsibilities.

476. TARU lost 17 detectives to the TARU Drone Team.

477. That headcount was pulled out of TARU and not replaced while plaintiff was TARU Commanding Officer.

478. The official transfer of those 17 detectives is documented on NYPD Personnel Order No. 185, dated August 4, 2025, effective 0001 hours July 21, 2025.

479. Personnel Order No. 185 transferred one Detective First Grade and sixteen Detective Investigators from TARU to the TARU Drone Team.

480. Plaintiff alleges that the operational drawdown of those 17 detectives began before the paper date.

481. Plaintiff alleges that those detectives were already functionally pulled out of TARU and working in Drone Team capacity before the order officially came down.

482. Plaintiff requested replacement of those 17 detectives.

483. Plaintiff received no help at all.

484. Plaintiff alleges that the request to backfill the Drone Team drawdown was made to plaintiff's chain of command and went unanswered.

485. Plaintiff alleges that the same silence pattern used to deny plaintiff an Executive Officer was used to deny plaintiff backfill for the Drone Team drawdown.

486. Plaintiff alleges that while TARU was down 17 detectives, TARU still had to perform all standing TARU duties.

487. Those duties included response to incidents and camera installations throughout New York City.

488. Those duties also included rooftop drone responsibilities.

489. Those duties also included beach-safety drone operations with payloads.

490. Those duties also included Drone-as-First-Responder operations that plaintiff built and stood up.

491. Those duties also included parades, protests, and meetings that the Commanding Officer and Executive Officer of TARU were expected to attend and run.

492. Plaintiff alleges that TARU personnel worked many hours at beach details.

493. Plaintiff alleges that personnel was needed for those beach details.

494. Plaintiff alleges that the beach-safety drone mission was a headline TARU capability that the Department had publicly promoted.

495. Plaintiff alleges that she was running that same mission, expanded, with 17 fewer detectives and no Executive Officer.

496. Plaintiff alleges that every one of those workstreams — standing TARU response, citywide camera installations, rooftop drones, beach safety drones with payloads, Drone-as-First-Responder, parades, protests, and brass meetings — ran through plaintiff alone, without a Captain-level second-in-command and with a headcount of 17 detectives below baseline.

497. Plaintiff alleges that no matter how hard plaintiff worked in TARU, she never heard “good job.”

498. Plaintiff alleges that it was always a problem and criticism.

499. Plaintiff alleges that she built and ran the citywide drone program, including rooftop drones, beach drones with payloads, and Drone-as-First-Responder.

500. Plaintiff alleges that she delivered the mission that was the Department's own public headline for TARU.

501. Plaintiff alleges that she absorbed the loss of 17 detectives to the Drone Team and covered every workstream without an Executive Officer.

502. Plaintiff alleges that what came back from the chain was not acknowledgment, but constant criticism.

503. Early in plaintiff's TARU tenure, two police officers were transferred into TARU on Investigative Assignments by official Personnel Orders.

504. Police Officer Shenetta D. Walker, TAX No. 949922, was transferred from the 102 Precinct to TARU effective 0001 hours October 25, 2023, on Personnel Order No. 259.

505. Police Officer Shan C. France, TAX No. 936611, was transferred from the School Safety Division to TARU effective 0001 hours November 6, 2023, on Personnel Order No. 269.

506. Plaintiff also brought Sergeant Jessica Martinez to TARU from Police Service Area 9.

507. Plaintiff alleges that Walker and France are both Black.

508. Plaintiff alleges that Sergeant Martinez is a Hispanic female.

509. Plaintiff alleges that Walker, France, and Sergeant Martinez stayed at TARU through plaintiff's tenure as Commanding Officer.

510. Plaintiff alleges that Sergeant Martinez remains at TARU in the same capacity to this day.

511. Plaintiff alleges that the personnel plaintiff actually brought into and retained under her command were minority officers, including two Black police officers on Investigative Assignments and a Hispanic female Sergeant.

512. Plaintiff alleges that those personnel-order facts are official and on paper, unlike the verbal-only and silence-as-denial pattern that defined plaintiff's Executive Officer and Drone Team backfill denials.

513. Plaintiff alleges that the personnel plaintiff retained over the long haul were minority officers.

514. Plaintiff alleges that the Drone Team headcount the Department withheld during plaintiff's tenure has been restored to plaintiff's male successor.

515. Plaintiff's male successor as TARU Commanding Officer was Deputy Inspector Kevin R. Cain, TAX No. 936275.

516. Cain replaced plaintiff as Commanding Officer of TARU after plaintiff was transferred out.

517. Plaintiff alleges, in plaintiff's own words, "As soon as they could they transferred me out and put in DI Kevin Cain as the CO and gave him an XO with his transfer. He also started to receive personnel immediately that was needed."

518. Cain came to TARU from the Office of the Chief of Department.

519. Cain's effective date as Commanding Officer of TARU was 0001 hours September 12, 2025.

520. Cain received a Captain-level Executive Officer on Day 1.

521. Cain's Executive Officer was Probationary Captain Muhammad Ahmed, TAX No. 939848.

522. Captain Ahmed was transferred from the 60 Precinct to TARU as Executive Officer on the same Personnel Order No. 226 that transferred Cain into TARU.

523. Plaintiff alleges that Cain was one rank lower than plaintiff.

524. Plaintiff alleges that Cain was very good friends with defendant CHELL and Chief MICHAEL J. LIPETRI.

525. Plaintiff alleges that Cain had worked for both defendant CHELL and defendant LIPETRI at the 75 Precinct as a Lieutenant.

526. Plaintiff alleges that Cain came to TARU directly from defendant LIPETRI's Crime Control Strategies / Compstat command in the Office of the Chief of Department.

527. Plaintiff alleges that Cain was not a neutral pick.

528. Plaintiff alleges that Cain was defendant LIPETRI's man.

529. Plaintiff alleges that Cain was brought in from defendant LIPETRI's command.

530. Plaintiff alleges that the Executive Officer and personnel provided to Cain were the resources plaintiff had requested and been denied for approximately two years.

531. Plaintiff alleges that all 17 detectives pulled from TARU to the Drone Team are now operationally back in their old TARU positions under Cain as Commanding Officer.

532. Plaintiff alleges that the return of those 17 detectives has not yet officially come down on FINEST.

533. Plaintiff alleges that everything is delayed.

534. Plaintiff alleges that operationally, the same headcount denied to plaintiff, the first female Commanding Officer, across two years and repeated requests has been restored to TARU under the male successor.

535. Plaintiff alleges that the detectives did not disappear.

536. Plaintiff alleges that those detectives were withheld from plaintiff and then returned to Cain.

537. Plaintiff alleges that this was not a budget constraint.

538. Plaintiff alleges that this was not a hiring freeze.

539. Plaintiff alleges that this was not a department-wide drone-program reorganization.

540. Plaintiff alleges that it was a personnel posture that tracked the identity of the Commanding Officer.

541. Plaintiff alleges that the operational fact pattern was as follows: subtract 17 detectives; add rooftop drones, beach drones with payloads, and Drone-as-First-Responder; deny the Executive Officer; refuse to fill personnel requests; make an Executive Officer available to the male predecessor and a Captain-level Executive Officer available to the male successor on Day 1, but not to the first female Commanding Officer; then, after the first female Commanding Officer is removed, return the same 17 detectives to TARU under the male successor.

542. Plaintiff alleges that this sequence was a setup for failure.

543. Plaintiff alleges that the comparator evidence is direct: the male predecessor had an Executive Officer; the first female Commanding Officer was denied an Executive Officer for approximately two years; the male successor received a Captain-level Executive Officer on the same order that moved him in.

544. Plaintiff alleges that Detective John W. Laurie was a detective in TARU during plaintiff's tenure.

545. Plaintiff alleges that Detective Laurie was extremely problematic.

546. Plaintiff had Detective Laurie shipped to Transit temporarily.

547. Plaintiff alleges that Detective Laurie was livid about being shipped to Transit.

548. Plaintiff alleges that Detective Laurie was very vocal that he wrote an anonymous letter about plaintiff.

549. Plaintiff alleges that Detective Laurie told several people in TARU that he wrote the letter.

550. Plaintiff alleges that Detective Laurie stated, in substance, “Fuck with the bull you get the horns.”

551. Plaintiff alleges that Detective Laurie is the person who wrote one of the anonymous letters about plaintiff.

552. Plaintiff alleges that two anonymous letters total were written about plaintiff in TARU.

553. Plaintiff does not currently have copies of the anonymous letters.

554. Plaintiff alleges that the authors of the second anonymous letter are presently unknown and should be identified through discovery.

555. Plaintiff alleges that potential authors of the second anonymous letter include persons with motive, including those plaintiffs had counseled, demoted, or transferred; those passed over for the Executive Officer position plaintiff requested; and those affiliated with plaintiff’s eventual male successor, Cain.

556. Plaintiff alleges that the anonymous letters became part of the retaliatory sequence that later produced Internal Affairs Bureau activity, surveillance, and Charges and Specifications.

557. Plaintiff alleges that the anonymous letters did not arise in a vacuum.

558. Plaintiff alleges that the anonymous letters arose after plaintiff brought minority officers into TARU, opposed Skydio-related conduct, requested an Executive Officer and personnel, ran TARU without adequate support, and operated as the first female Commanding Officer in an environment where the “good ol boys” did not want plaintiff to succeed.

559. Plaintiff learned of her transfer out of TARU by telephone from Lieutenant Erik J. DePasquale, the administrative Lieutenant in TARU.

560. Lieutenant DePasquale did not deliver the FINEST notification to plaintiff in person.

561. Plaintiff was the Commanding Officer of TARU and held the rank of Inspector, yet she learned of her own transfer by phone from a Lieutenant.

562. Plaintiff did not learn of the transfer from her chain of command.

563. Plaintiff did not receive a meeting before the transfer.

564. Plaintiff did not receive an explanation before the transfer.

565. Plaintiff alleges that the manner in which she was notified of the transfer was itself part of the discriminatory and retaliatory treatment.

566. Plaintiff's transfer out of TARU was effective 0001 hours September 12, 2025, pursuant to Personnel Order No. 226.

567. Personnel Order No. 226 was published on September 19, 2025, seven days after it was already effective.

568. Personnel Order No. 226 was signed by John Benoit, Chief of Personnel, "By Direction of the Police Commissioner."

569. Plaintiff alleges that she was removed from TARU, replaced by a lower-ranked male successor connected to defendant CHELL and defendant LIPETRI, and denied the dignity of direct notification by the chain of command.

570. Plaintiff alleges that defendants denied plaintiff equal command support, denied plaintiff an Executive Officer, denied plaintiff personnel, removed 17 detectives from plaintiff's command without backfill, criticized plaintiff constantly, disregarded plaintiff's Skydio integrity

concerns, tolerated or encouraged anonymous-letter activity, and then replaced plaintiff with a male successor who immediately received the support plaintiff had been denied.

571. Plaintiff alleges that the TARU period was a major liability period in the continuing pattern of gender discrimination, hostile work environment, retaliation, selective enforcement, aiding and abetting, and punishment by accusation alleged in this action.

F. Plaintiff's Advocacy for Black and Hispanic Officers / Career-Long Pattern of Protected Association and Retaliatory Animus

572. Plaintiff has advocated for Black and Hispanic officers throughout her NYPD career.

573. Plaintiff alleges that her advocacy for Black and Hispanic officers was not limited to the Technical Assistance and Response Unit ("TARU").

574. Plaintiff alleges that her advocacy included supporting Black and Hispanic officers' assignments, opportunities, credibility, command treatment, operational participation, and advancement.

575. Plaintiff alleges that her advocacy for Black and Hispanic officers was known to members of the Department who worked with her, supervised her, observed her, or operated in commands where plaintiff served.

576. Plaintiff alleges that her advocacy for Black and Hispanic officers became part of the discriminatory and retaliatory animus directed at her by Department actors who disapproved of plaintiff's support for minority members of the service.

577. During plaintiff's TARU tenure, Sergeant Nicholas Gravino spoke with plaintiff in plaintiff's TARU office and stated, in words to this effect, "You have a history of taking care of minorities."

578. Plaintiff alleges that Sergeant Gravino's statement confirmed that plaintiff's pattern of supporting Black and Hispanic officers was visible and known inside TARU.

579. Plaintiff alleges that Sergeant Gravino is a living percipient witness to plaintiff's advocacy for Black and Hispanic officers and to the perception inside TARU that plaintiff had a history of supporting minority officers.

580. Plaintiff brought Black and Hispanic officers into TARU during her tenure as Commanding Officer.

581. Those officers included Police Officer Shenetta D. Walker, Police Officer Shan C. France, and Sergeant Jessica Martinez.

582. Plaintiff alleges that Police Officer Walker and Police Officer France are Black.

583. Plaintiff alleges that Sergeant Martinez is Hispanic.

584. Plaintiff alleges that Sergeant Martinez came to TARU from Police Service Area 9.

585. Plaintiff alleges that those officers remained at TARU during plaintiff's tenure and that Sergeant Martinez remains at TARU in the same capacity.

586. Plaintiff alleges that those personnel are relevant to plaintiff's protected association, opposition to discriminatory culture, and the retaliatory resistance plaintiff experienced.

587. Timothy Pearson also directly recognized plaintiff's advocacy for Black and Hispanic officers.

588. During a conversation in Timothy Pearson's office, Pearson stated to plaintiff, in words to this effect, that plaintiff had a reputation for taking care of minorities and that "they" did not like it.

589. Chief Milton Mamara was physically present during Timothy Pearson's statement.

590. Plaintiff alleges that Pearson's statement was significant because Pearson did not merely say plaintiff supported minority officers; Pearson specifically stated that "they" did not like plaintiff's reputation for taking care of minorities.

591. Plaintiff alleges that Pearson's use of the word "they" identified a group inside or connected to the Department that disapproved of plaintiff's advocacy for Black and Hispanic officers.

592. Plaintiff alleges that Pearson did not identify each member of that group by name during the conversation.

593. Plaintiff alleges that the operational facts alleged in this complaint are consistent with Pearson's statement.

594. Plaintiff alleges that the same senior command actors and operational networks that resisted plaintiff at TARU denied plaintiff an Executive Officer, denied plaintiff personnel, failed to backfill the 17-detective drawdown, criticized plaintiff's work, transferred plaintiff out, and replaced plaintiff with a lower-ranked male successor who immediately received the Executive Officer and personnel support plaintiff had been denied.

595. Plaintiff alleges that Pearson is a material witness to plaintiff's reputation within or around the Department as a senior officer who supported Black and Hispanic officers.

596. Plaintiff alleges that Chief Mamara is a material witness because he was physically present when Pearson made the statement.

597. Plaintiff alleges that Pearson's statement corroborates Sergeant Gravino's independent statement inside TARU.

598. Plaintiff alleges that plaintiff's advocacy for Black and Hispanic officers also predated TARU, including during plaintiff's earlier Brooklyn North Borough Crime experience.

599. Plaintiff alleges that defendant MADDREY's statement that the Detective Bureau, Intelligence, and TARU were racist to plaintiff is consistent with plaintiff's history of advocating for Black and Hispanic officers and with the resistance plaintiff experienced after being placed into TARU to change the culture.

600. Plaintiff alleges that the resistance to plaintiff's advocacy included silence in response to Executive Officer requests, silence in response to personnel requests, refusal to backfill the 17 detectives pulled to the Drone Team, criticism of plaintiff's work, anonymous TARU letters, Internal Affairs Bureau surveillance, removal from TARU, replacement by a male successor, and later disciplinary escalation.

601. Plaintiff alleges that plaintiff's career-long advocacy for Black and Hispanic officers is relevant to her claims for discrimination, hostile work environment, retaliation, aiding and abetting, and post-complaint adverse treatment.

602. Plaintiff alleges that defendants and other Department actors treated plaintiff's advocacy for Black and Hispanic officers as a reason to resist, isolate, undermine, criticize, surveil, transfer, and discipline her.

603. Plaintiff alleges that Sergeant Gravino, Timothy Pearson, Chief Mamara, the Black and Hispanic officer's plaintiff brought into TARU, and Brooklyn North Borough Crime officers are material witnesses to this pattern.

G. Anonymous Letters, Internal Affairs Bureau Activity, Medical Timing, and Surgery-Related Retaliatory Escalation

604. On June 11, 2025, the Internal Affairs Bureau ("IAB") Command Center received two anonymous letters alleging misconduct by plaintiff.

605. The first anonymous letter alleged, in substance, that plaintiff was rarely present at her assigned command, managed operations by text messages, and attended workout classes, massages, and beauty treatments during scheduled work hours.

606. The second anonymous letter alleged, in substance, that plaintiff failed to report to her command building, was manually signed in and out of the Department's Attendance Application by select personnel, conducted personal errands and appointments, spent extended periods in her department vehicle, had unauthorized surveillance equipment installed in or around her office, and brought her dogs to work.

607. Plaintiff alleges that several categories in the anonymous letters, including managing operations by text message and working from a department vehicle, described normal operational conduct for the Commanding Officer of a citywide technical unit responsible for responding across New York City.

608. Plaintiff alleges that the anonymous letters also used gendered framing, including references to workout classes, massages, and beauty treatments, in a manner not ordinarily applied to male Commanding Officers of citywide operational commands.

609. Plaintiff alleges that Detective John W. Laurie, a TARU detective, wrote one of the anonymous letters.

610. Plaintiff alleges that Detective Laurie was extremely problematic.

611. Plaintiff had Detective Laurie temporarily transferred to Transit in May 2025.

612. Plaintiff alleges that Detective Laurie was livid about being transferred to Transit.

613. Plaintiff alleges that Detective Laurie was vocal inside TARU that he wrote the anonymous letter.

614. Plaintiff alleges that Detective Laurie told several TARU personnel that he wrote the letter.

615. Plaintiff alleges that Detective Laurie stated, in substance, “Fuck with the bull you get the horns.”

616. Plaintiff alleges that the timing supports retaliatory motive: Detective Laurie was transferred to Transit in May 2025, and the anonymous letters were received by IAB on June 11, 2025.

617. Plaintiff alleges that two anonymous letters were written about plaintiff in TARU.

618. Plaintiff alleges that the author or authors of the second anonymous letter are presently unknown and should be identified through discovery.

619. Plaintiff alleges that possible authors include persons with motive, including that plaintiff counseled, demoted, transferred, passed over for the Executive Officer position plaintiff requested, or persons affiliated with plaintiff’s eventual male successor, Deputy Inspector Kevin R. Cain.

620. Plaintiff alleges that the anonymous letters did not arise in a vacuum.

621. Plaintiff alleges that the anonymous letters followed plaintiff’s repeated requests for an Executive Officer, her requests for personnel, her opposition to Skydio-related conduct, her support for Black and Hispanic officers, her transfer of Detective Laurie, and her operation as the first female Commanding Officer of TARU.

622. Plaintiff alleges that IAB then conducted seven surveillance operations concerning plaintiff.

623. Plaintiff alleges that the surveillance began after plaintiff returned to work on or about August 5, 2025 following surgery and while plaintiff was still recovering and on limited duty.

624. Plaintiff did not know at the time that IAB was conducting surveillance.

625. Plaintiff did not know at the time that anonymous letters had been submitted to IAB.

626. Plaintiff's first notice of the IAB investigation was a verbal GO-15 notification by telephone on or about August 22, 2025.

627. Plaintiff alleges that she did not receive written GO-15 notification at that time.

628. Plaintiff alleges that the verbal GO-15 notification was procedurally irregular because a GO-15 is a serious investigative process with potential disciplinary consequences.

629. On August 28, 2025, plaintiff appeared for an IAB-Special Investigations Unit interview.

630. Present at the August 28, 2025 interview were Inspector Dawit Fikru, Commanding Officer of IAB Group 1; plaintiff's attorney Keith Wells; Captains Endowment Association representative Kristen Shafer; Sergeant Daphney Pamphile; and a supervising IAB lieutenant.

631. Sergeant Pamphile was the lead IAB Special Investigations Unit investigator.

632. Plaintiff told IAB during the August 28, 2025 interview that she was not doing well and that she was sick.

633. Plaintiff alleges that her medical condition, recovery status, limited-duty status, and operational responsibilities were material to any fair assessment of the surveillance allegations.

634. Plaintiff alleges that IAB nevertheless treated the observations as misconduct rather than evaluating the full operational and medical context.

635. Plaintiff had previously notified defendant JOHN M. CHELL in writing that she was in pain, had been in the hospital, and had to undergo surgery.

636. On June 29, 2025, at 10:00 a.m., plaintiff texted defendant CHELL: “Boss i would never just blow work off or meetings. Im trying not to be absentee landord but im in a lot of pain. Was in hospital. I have to go for surgery with my dr.”

637. Defendant CHELL did not substantively respond to plaintiff’s June 29, 2025 text.

638. Plaintiff alleges that defendant CHELL was therefore on written notice of plaintiff’s serious medical situation before the later IAB surveillance and disciplinary escalation.

639. Plaintiff alleges that defendant CHELL had also publicly called attention to plaintiff’s absence from a citywide meeting by asking where the Commanding Officer of TARU was and why plaintiff was not there.

640. Plaintiff alleges that defendant CHELL’s public call-out, non-response to plaintiff’s medical text, later public humiliation of plaintiff, and involvement in TARU operational control are part of the same retaliatory and discriminatory chronology.

641. Plaintiff alleges that the IAB surveillance occurred during a period when plaintiff was recovering, on limited duty, and already operating without adequate command support, an Executive Officer, or sufficient personnel.

642. Plaintiff alleges that the surveillance observations ignored plaintiff’s role as Commanding Officer of a citywide technical unit.

643. Plaintiff alleges that plaintiff often used her department vehicle as a mobile command post because TARU was responsible for citywide response and defendant KAZ

DAUGHTRY demanded rapid response times that were often unrealistic given traffic, distance, and citywide conditions.

644. Plaintiff alleges that defendant DAUGHTRY expected TARU to arrive at locations within approximately 15 to 20 minutes, even where travel time was substantially longer.

645. Plaintiff alleges that this expectation contributed to plaintiff's need to remain mobile in her department vehicle.

646. Plaintiff alleges that TARU detectives can corroborate defendant DAUGHTRY's response-time demands and the operational necessity of mobility.

647. Plaintiff alleges that IAB did not fairly account for the operational reality of plaintiff's TARU command.

648. Plaintiff alleges that IAB also did not fairly account for available Department records that could verify plaintiff's movements and work activity.

649. Those records include Automatic Vehicle Locator records, phone records, drone-truck audio and video, drone-controller recordings, TARU post records, and other Department records.

650. Plaintiff alleges that IAB characterized plaintiff as having "no independent recollection" concerning certain dates, but plaintiff in fact gave an operational explanation concerning TARU posts and beach-related assignments.

651. Plaintiff alleges that IAB characterized plaintiff as having no documentation, but plaintiff identified available Department-controlled records that could verify where she went and what she did.

652. Plaintiff alleges that IAB chose not to use those records in a fair manner.

653. Plaintiff alleges that the IAB investigation relied on observations of commercial locations, a spa, shopping, and a dog park without fairly accounting for plaintiff's medical status, meal periods, citywide command role, mobile-command practice, limited duty, and availability to TARU personnel by phone.

654. Plaintiff alleges that the IAB surveillance and investigation were not neutral.

655. Plaintiff alleges that the surveillance and investigation were part of the continuing sequence that began with plaintiff's placement into TARU to change a discriminatory culture, continued with denial of an Executive Officer and personnel, continued with anonymous letters from inside TARU, and led to plaintiff's removal from TARU and later Charges and Specifications.

656. Plaintiff alleges that the timing is material because the surveillance began shortly after plaintiff returned from surgery and while plaintiff remained in a vulnerable medical and limited-duty posture.

657. Plaintiff alleges that the Department did not pause, accommodate, refer for medical review, refer for Equal Employment Opportunity review, or fairly investigate the retaliatory context after plaintiff disclosed that she was sick and not doing well.

658. Plaintiff alleges that the anonymous letters, IAB surveillance, GO-15 process, and August 28, 2025 interview became part of the retaliatory escalation against plaintiff.

659. Plaintiff alleges that this escalation was later used to support Charges and Specifications, despite the unresolved, disputed, and unproven nature of the allegations.

H. Transfer from TARU to Patrol Borough Brooklyn South / Post-TARU Marginalization

660. On or about September 12, 2025, plaintiff was transferred out of the Technical Assistance and Response Unit ("TARU") to Patrol Borough Brooklyn South.

661. Plaintiff's transfer was effective at 0001 hours on September 12, 2025.
662. Plaintiff's transfer was reflected in Personnel Order No. 226, dated September 19, 2025.
663. Personnel Order No. 226 was published seven days after the effective date of plaintiff's transfer.
664. Personnel Order No. 226 was signed by John Benoit, Chief of Personnel, "By Direction of the Police Commissioner."
665. Personnel Order No. 226 transferred Inspector DANIELLE E. RAIA, Tax No. 924370, from the Technical Assistance and Response Unit to Patrol Borough Brooklyn South.
666. Plaintiff alleges that Personnel Order No. 226 is the Department document that formally effected plaintiff's removal from TARU.
667. Plaintiff alleges that no separate FINEST message is required to establish the transfer because Personnel Order No. 226 itself transferred plaintiff from TARU to Patrol Borough Brooklyn South.
668. The same Personnel Order No. 226 designated Deputy Inspector Kevin R. Cain, Tax No. 936275, as the new Commanding Officer of TARU.
669. The same Personnel Order No. 226 assigned Probationary Captain Muhammad Ahmed, Tax No. 939848, as Executive Officer of TARU.
670. Deputy Inspector Kevin R. Cain's designation as Commanding Officer of TARU was effective at the same 0001 hours on September 12, 2025.
671. Probationary Captain Muhammad Ahmed's assignment as Executive Officer of TARU was effective at the same 0001 hours on September 12, 2025.

672. Plaintiff alleges that the same Department order removed plaintiff from TARU, installed a male successor as Commanding Officer of TARU, and gave that male successor the Executive Officer plaintiff had repeatedly requested and been denied.

673. Plaintiff alleges that the transfer order is therefore direct comparator evidence.

674. Plaintiff alleges that she learned of her own transfer from Lieutenant Erik J. DePasquale.

675. Lieutenant Erik J. DePasquale was the administrative lieutenant assigned to TARU.

676. Lieutenant DePasquale called plaintiff by telephone after Personnel Order No. 226 came down.

677. Plaintiff alleges that Lieutenant DePasquale's telephone call was the first notice plaintiff received that she had been transferred out of TARU.

678. Plaintiff alleges that the call occurred at approximately 2:00 p.m.

679. Plaintiff alleges that Lieutenant DePasquale did not deliver the transfer notification to plaintiff in person.

680. Plaintiff alleges that no person above Lieutenant DePasquale called plaintiff before the order came down.

681. Plaintiff alleges that no person above Lieutenant DePasquale called plaintiff after the order came down to explain the transfer.

682. Plaintiff alleges that no member of the Chief of Department's Office contacted plaintiff to discuss her removal from TARU.

683. Plaintiff alleges that no supervisor gave plaintiff advance notice of the transfer.

684. Plaintiff alleges that no supervisor gave plaintiff an explanation for the transfer.

685. Plaintiff alleges that no reason for the transfer was provided to plaintiff at all.

686. Plaintiff alleges that the manner of notification was itself humiliating and inconsistent with plaintiff's rank, command status, and position as Inspector and Commanding Officer of TARU.

687. Plaintiff alleges that plaintiff was the outgoing Commanding Officer of one of the Department's most prestigious citywide technical commands, yet she learned of her removal by a telephone call from an administrative lieutenant rather than from her chain of command.

688. Plaintiff alleges that Deputy Inspector Kevin R. Cain, the incoming male Commanding Officer of TARU, was treated differently.

689. Plaintiff alleges that Deputy Inspector Cain was personally notified by defendant JOHN M. CHELL concerning Cain's designation as Commanding Officer of TARU.

690. Plaintiff alleges that Deputy Inspector Cain later told plaintiff that he was shocked and grateful when defendant JOHN M. CHELL called him.

691. Plaintiff alleges that defendant JOHN M. CHELL's personal notification to Deputy Inspector Cain contrasts sharply with the Department's failure to notify plaintiff through any senior command channel.

692. Plaintiff alleges that the incoming male Commanding Officer received a personal call from the Chief of Department, while the outgoing female Commanding Officer received only a telephone call from an administrative lieutenant after the order had already come down.

693. Plaintiff alleges that this disparity reflected gender-based disparate treatment, retaliatory humiliation, and intentional diminishment of plaintiff's rank and command status.

694. Plaintiff alleges that the transfer was viewed inside the Department as punitive.

695. Plaintiff alleges that people called plaintiff in a panic after learning of the transfer.

696. Those callers asked plaintiff, in substance, “What happened?” and “Why were you transferred?”

697. Plaintiff alleges that the reaction inside the Department reflected that the transfer was understood as adverse, punitive, humiliating, or corrective.

698. Plaintiff alleges that Department members knew plaintiff was being “jammed up” because of the anonymous letters and related Internal Affairs Bureau activity.

699. Plaintiff alleges that the transfer was intended to humiliate plaintiff and to signal that plaintiff had been punished.

700. Plaintiff alleges that the transfer substantially diminished plaintiff’s duties, prestige, authority, operational responsibility, command role, reputation, and promotional posture.

701. Before the transfer, plaintiff was Commanding Officer of TARU.

702. Plaintiff alleges that TARU is one of the most prestigious citywide technical units in the NYPD.

703. Plaintiff alleges that TARU handles investigations, surveillance, camera operations, major parades, protests, emotionally disturbed person incidents, Emergency Service Unit responses, catastrophic incidents, building collapses, fires, terrorism-related operational support, video retrieval from shootings, video retrieval from police-involved shootings, and other serious incidents.

704. Plaintiff alleges that TARU’s mission is essential to citywide NYPD operations.

705. Plaintiff alleges that as Commanding Officer of TARU, plaintiff had command authority over TARU’s full mission set.

706. Plaintiff alleges that as Commanding Officer of TARU, plaintiff had operational authority over surveillance, cameras, drone operations, parades, protests, Emergency Service Unit support, catastrophic incidents, technical responses, serious-incident support, and citywide video retrieval.

707. Plaintiff alleges that as Commanding Officer of TARU, plaintiff had authority over the command staff she had built.

708. Plaintiff alleges that as Commanding Officer of TARU, plaintiff had authority over technical operations and budget-related functions.

709. Plaintiff alleges that as Commanding Officer of TARU, plaintiff had promotional visibility as the first female Commanding Officer of TARU heading into a chief's promotion cycle.

710. Plaintiff alleges that the transfer stripped plaintiff of that command authority and operational visibility.

711. Plaintiff alleges that the transfer removed plaintiff from one of the Department's most prestigious citywide units and sent her to Patrol Borough Brooklyn South to sit at a desk with little or no meaningful responsibility.

712. Plaintiff alleges that after the transfer she was treated, in her own words, "like I was a leper."

713. Plaintiff alleges that the Patrol Borough Brooklyn South placement was not equivalent to the TARU Commanding Officer position.

714. Plaintiff alleges that the Patrol Borough Brooklyn South placement deprived plaintiff of TARU's prestige, citywide operational command role, high-visibility assignments, staff authority, technical authority, and advancement value.

715. Plaintiff alleges that the Patrol Borough Brooklyn South placement damaged plaintiff's professional standing.

716. Plaintiff alleges that plaintiff's reputation was tarnished by the transfer.

717. When plaintiff arrived at Patrol Borough Brooklyn South, Deputy Inspector Guven commented on the manner of plaintiff's transfer.

718. Deputy Inspector Guven told plaintiff, in substance, that it was "disgusting" that the Department did not even give plaintiff a call about her transfer.

719. Deputy Inspector Guven also told plaintiff, in substance, that he was sorry plaintiff had been transferred there in the manner she was transferred.

720. Plaintiff alleges that Deputy Inspector Guven's statement is contemporaneous peer-level corroboration that the manner of plaintiff's transfer was irregular, disrespectful, and humiliating.

721. Plaintiff alleges that Deputy Inspector Guven's statement is also evidence that the transfer was understood by Department personnel as punitive or reputationally damaging.

722. Plaintiff alleges that the transfer must be evaluated together with the surrounding chronology.

723. Plaintiff had repeatedly requested an Executive Officer while serving as Commanding Officer of TARU.

724. Plaintiff had repeatedly requested personnel support while serving as Commanding Officer of TARU.

725. Plaintiff had been denied an Executive Officer for approximately two years.

726. Plaintiff had been denied replacement personnel after 17 detectives were pulled from TARU to the TARU Drone Team.

727. Plaintiff had raised concerns about Skydio and its relationship with senior operational command actors.

728. Plaintiff had advocated for Black and Hispanic officers.

729. Plaintiff had been targeted by anonymous letters received by the IAB Command Center on June 11, 2025.

730. Plaintiff had been subjected to IAB surveillance after her August 5, 2025 return from surgery.

731. Plaintiff had been publicly called out by defendant JOHN M. CHELL regarding her medical-related absence.

732. Plaintiff had been publicly humiliated by defendant JOHN M. CHELL and Tarik Sheppard during the pre-Labor Day 2025 meeting at the Brooklyn Museum.

733. Plaintiff had disclosed her medical condition to IAB during the August 28, 2025 GO-15 interview.

734. Plaintiff was then transferred out of TARU effective September 12, 2025.

735. Plaintiff alleges that the transfer was not a neutral personnel decision.

736. Plaintiff alleges that the transfer was a retaliatory and discriminatory removal from command.

737. Plaintiff alleges that the transfer was the operational culmination of the prior denial of support, anonymous letters, surveillance, medical disregard, humiliation, and command resistance plaintiff experienced at TARU.

738. Plaintiff alleges that the replacement sequence confirms the discriminatory and retaliatory nature of the transfer.

739. Deputy Inspector Kevin R. Cain, a male officer, replaced plaintiff as Commanding Officer of TARU.

740. Plaintiff alleges that Deputy Inspector Cain was lower in rank than plaintiff.

741. Plaintiff alleges that Deputy Inspector Cain was connected to defendant JOHN M. CHELL and defendant MICHAEL LIPETRI.

742. Plaintiff alleges that Deputy Inspector Cain was very good friends with defendant JOHN M. CHELL and defendant MICHAEL LIPETRI.

743. Plaintiff alleges that Deputy Inspector Cain had worked for both defendant CHELL and defendant LIPETRI at the 75 Precinct when Cain was a Lieutenant.

744. Plaintiff alleges that Deputy Inspector Cain came to TARU directly from the Office of the Chief of Department.

745. Plaintiff alleges that Deputy Inspector Cain also came from defendant MICHAEL LIPETRI's Crime Control Strategies / Compstat command in the Chief of Department's Office.

746. Plaintiff alleges that Deputy Inspector Cain's placement into TARU was not independent of the CHELL / LIPETRI command network.

747. Plaintiff alleges that Deputy Inspector Cain received an Executive Officer immediately.

748. Plaintiff alleges that Deputy Inspector Cain received Probationary Captain Muhammad Ahmed as Executive Officer on the same Personnel Order that transferred Cain into TARU.

749. Plaintiff alleges that Deputy Inspector Cain also began receiving needed personnel immediately.

750. Plaintiff alleges that the same resources denied to plaintiff were made available to her male successor.

751. Plaintiff alleges that the Department's conduct cannot be explained by lack of available Executive Officers, budget constraints, staffing shortages, or operational necessity.

752. Plaintiff alleges that the Department demonstrated its ability to provide TARU with an Executive Officer and personnel once a male successor connected to defendant CHELL and defendant LIPETRI replaced plaintiff.

753. Plaintiff alleges that the transfer from TARU to Patrol Borough Brooklyn South was a materially adverse employment action under the New York State Human Rights Law ("NYSHRL").

754. Plaintiff alleges that the transfer was also an adverse action under the more protective standards of the New York City Human Rights Law ("NYCHRL").

755. Plaintiff alleges that the transfer diminished plaintiff's prestige, responsibilities, operational authority, command staff, professional reputation, and advancement opportunities.

756. Plaintiff alleges that the transfer would reasonably deter a person from complaining about discrimination, hostile work environment, retaliation, and command misconduct.

757. Plaintiff alleges that the transfer was causally connected to plaintiff's gender, plaintiff's protected complaints, plaintiff's advocacy for Black and Hispanic officers, plaintiff's resistance to the Skydio-related operational network, plaintiff's medical disclosures, and the retaliatory escalation that followed the June 11, 2025 anonymous letters.

758. Plaintiff alleges that the transfer from TARU to Patrol Borough Brooklyn South forms a central adverse-action period in the continuing pattern of discrimination, hostile work

environment, retaliation, aiding and abetting, and post-complaint adverse treatment alleged in this action.

I. February 2026 Charges and Specifications / Selective Enforcement and Unproven Allegations

759. On February 25, 2026, the NYPD issued Charges and Specifications against plaintiff under Disciplinary Case No. C-035422.

760. The Charges and Specifications were issued while plaintiff was assigned to Patrol Borough Brooklyn South.

761. The alleged conduct concerned plaintiff's prior assignment as Commanding Officer of the Technical Assistance and Response Unit ("TARU").

762. The Charges and Specifications identified IAB Log No. 2026-6991.

763. The underlying confidential IAB investigation was conducted under IAB Log No. 2025-18353.

764. The underlying IAB Case Number was M-2025-1086.

765. The IAB Special Investigations Unit Report Number was 2026-31.

766. The Department Advocate Serial Number was 2026-626.

767. The IAB Member Notified was Police Officer Zhang.

768. The charging officer was Deputy Inspector Kenneth J. Harsch of the Department Advocate's Office, Command 550.

769. Deputy Inspector Harsch was also the signatory on the IAB Special Investigations Unit charging memorandum.

770. The lead IAB Special Investigations Unit investigator was Sergeant Daphney Pamphile, TAX No. 940545.

771. Before the Charges and Specifications were issued, IAB conferred with Department Advocate's Office Agency Attorney John Bennett.
772. The underlying charging memorandum was from the Commanding Officer, Special Investigations Unit, Internal Affairs Bureau, to the First Deputy Commissioner.
773. On February 27, 2026, the Executive Officer of the Internal Affairs Bureau issued a First Endorsement stating, in substance, "I concur with the issuance of charges and specifications."
774. Plaintiff alleges that the Charges and Specifications were not neutral discipline.
775. Plaintiff alleges that the Charges and Specifications were the product of the anonymous TARU letters, IAB surveillance, plaintiff's medical and limited-duty timing, plaintiff's removal from TARU, and the continuing retaliatory chronology alleged herein.
776. Plaintiff denies that the Charges and Specifications established misconduct.
777. Plaintiff did not plead guilty to the Charges and Specifications.
778. Plaintiff did not admit the allegations in the Charges and Specifications.
779. Plaintiff was not found guilty after a department trial.
780. Defendants did not obtain a final disciplinary adjudication establishing misconduct.
781. Defendants did not obtain a judicial finding establishing misconduct.
782. Defendants never proved the Charges and Specifications.
783. Plaintiff alleges that defendants nevertheless treated the unresolved and unproven Charges and Specifications as if they were established misconduct.
784. The first specification alleged that plaintiff engaged in personal business while on duty on four occasions between August 13, 2025 and August 20, 2025.

785. Plaintiff alleges that the timing of Specification 1 is material because those dates fell shortly after plaintiff returned to work following surgery and while plaintiff remained in a medical and limited-duty posture.

786. Plaintiff alleges that defendants failed to fairly evaluate whether any conduct characterized as “personal business” was medical-related, meal-period-related, command-related, otherwise authorized, or consistent with plaintiff’s citywide TARU responsibilities.

787. Plaintiff alleges that defendants used the surveillance observations selectively and without fair consideration of plaintiff’s medical condition, limited-duty status, recovery status, citywide command obligations, and availability to TARU personnel by phone.

788. The second specification alleged that plaintiff signed in or out “outside wire” 98 times between June 18, 2024 and August 27, 2025.

789. Plaintiff alleges that “outside wire” meant signing in from a phone or computer when starting duty outside the command building.

790. Plaintiff alleges that outside-wire sign-in was a common, visible, and tolerated practice for personnel whose assignments required them to start tours at field posts or locations other than the command building.

791. Plaintiff alleges that plaintiff had TARU posts along Rockaway Beach, including a post near Beach 108 Street.

792. Plaintiff alleges that plaintiff would leave her residence, go directly to a TARU post, check on TARU personnel, and then mark herself present for duty while physically at the post.

793. Plaintiff alleges that plaintiff did not mark herself present from home unless she was physically at a work-related location or otherwise performing work.

794. Plaintiff alleges that from those posts, plaintiff would travel to Coney Island, another TARU post, TARU headquarters, or other TARU-related locations.

795. Plaintiff alleges that TARU personnel, including outside units conducting covert operations and covert camera installations, also used outside-wire sign-in when their work required them to start at field locations.

796. Plaintiff alleges that the practice was visible in the Department Attendance Application and was not concealed.

797. Plaintiff alleges that supervisors and the chain of command could see outside-wire sign-ins in real time.

798. Plaintiff alleges that she received no training, warning, counseling, or prior notice that this practice would be treated as misconduct.

799. Plaintiff alleges that defendant CHELL's and defendant DAUGHTRY's drivers also signed in or out outside wire.

800. Plaintiff alleges that male executives also signed in, signed out, or ended tours at TARU and other locations in a manner similar to the conduct charged against plaintiff.

801. Plaintiff alleges that Chief Marlon Larin signed out at TARU when he had no significant reason or business to be there.

802. Plaintiff alleges that the Department selectively enforced outside-wire practices against plaintiff by charging her with 98 occasions of conduct that was common, tolerated, visible, and not treated as discipline when engaged in by male executives or favored personnel.

803. The third specification alleged manual attendance entries without use of the "COMMENT" caption.

804. Plaintiff alleges that the alleged "COMMENT" caption requirement was unclear.

805. Plaintiff does not recall receiving any specific training on the “COMMENT” caption requirement.

806. Plaintiff was never warned before charges were filed that any COMMENT-caption practice was improper.

807. Plaintiff alleges that she has never heard of another person being charged for the same alleged COMMENT-caption issue.

808. Plaintiff alleges that Specification 3 converted an alleged technical entry issue into misconduct.

809. Plaintiff alleges that treating an alleged COMMENT-caption omission as misconduct against the Commanding Officer of a citywide technical unit was absurd and selectively punitive.

810. The fourth specification alleged that plaintiff reported for duty while commuting, totaling 39 hours and 18 minutes.

811. Plaintiff disputes the Department’s time calculation.

812. Plaintiff alleges that the Department did not show plaintiff the underlying math supporting the 39-hour-and-18-minute figure.

813. Plaintiff alleges that the Department did not identify each date and time in a manner sufficient for plaintiff to fairly evaluate the calculation before discipline was pursued.

814. Plaintiff alleges that plaintiff routinely performed work before, during, and after travel, including while commuting.

815. Plaintiff alleges that calls started at plaintiff’s home before plaintiff even considered signing in.

816. Plaintiff alleges that plaintiff received hundreds of calls day and night, both on duty and off duty.

817. Plaintiff alleges that plaintiff did not submit for all of the off-duty time she spent responding to Department business.

818. Plaintiff alleges that working while traveling, commuting, or outside normal tour boundaries was common executive practice in the NYPD.

819. Plaintiff alleges that every executive officer plaintiff observed engaged in some form of work while commuting, traveling, off duty, or outside ordinary tour boundaries.

820. Plaintiff alleges that plaintiff is not aware of male executives being disciplined in the same manner for comparable conduct.

821. Plaintiff alleges that the Charges and Specifications ignored Department-controlled evidence that could verify plaintiff's work activity, location, and operational duties.

822. Such evidence included the Department Attendance Application, TARU sign-in and sign-out records, payroll records, Automatic Vehicle Locator records, phone records, TARU post records, drone-truck audio and video, drone-controller recordings, and witness testimony.

823. Plaintiff alleges that defendants also failed to account for whether the challenged practices were common, permitted, accepted, visible, tolerated, or applied differently to male executives and favored personnel.

824. Plaintiff alleges that the Charges and Specifications relied upon allegations derived from anonymous letters and surveillance without fairly considering the retaliatory origin of the anonymous letters.

825. Plaintiff alleges that the Charges and Specifications relied upon allegations derived from anonymous letters and surveillance without fairly considering plaintiff's role as Commanding Officer of a citywide technical unit.

826. Plaintiff alleges that the Charges and Specifications relied upon allegations derived from anonymous letters and surveillance without fairly considering plaintiff's limited-duty and medical timing.

827. Plaintiff alleges that the Charges and Specifications relied upon allegations derived from anonymous letters and surveillance without fairly considering the Department's own records.

828. Plaintiff alleges that the Charges and Specifications were issued after plaintiff complained about discrimination and hostile work environment, after plaintiff advocated for Black and Hispanic officers, after plaintiff opposed Skydio-related conduct, after plaintiff requested an Executive Officer and personnel, after plaintiff was denied those resources, after plaintiff was removed from TARU, and after plaintiff was replaced by a lower-ranked male successor who immediately received the support plaintiff had been denied.

829. Plaintiff alleges that the Charges and Specifications were part of the same continuing pattern of discrimination, hostile work environment, retaliation, selective enforcement, aiding and abetting, and punishment by accusation alleged in this action.

830. Plaintiff alleges that defendants used the Charges and Specifications to create leverage against plaintiff, damage plaintiff's reputation, pressure plaintiff toward separation, and justify adverse treatment that had already begun before any misconduct was proven.

831. Plaintiff alleges that the Charges and Specifications remained unresolved and unproven.

832. Plaintiff alleges that defendants' reliance on those unresolved and unproven allegations violated the New York State Human Rights Law and the New York City Human Rights Law.

J. Negotiated Settlement Offer / Forced-Retirement Pressure / Reliance on Unproven Charges

833. After the February 25, 2026 Charges and Specifications were issued, plaintiff was presented with a proposed Negotiated Settlement.

834. The proposed Negotiated Settlement was based upon unresolved and unproven allegations.

835. Plaintiff did not sign the proposed Negotiated Settlement.

836. Plaintiff did not plead guilty.

837. Plaintiff did not admit guilt.

838. Plaintiff did not admit the allegations in the Charges and Specifications.

839. Plaintiff did not receive a department trial.

840. Defendant THE CITY OF NEW YORK did not obtain a finding of guilt.

841. Defendant THE CITY OF NEW YORK did not obtain a final disciplinary adjudication establishing misconduct.

842. Defendant THE CITY OF NEW YORK did not obtain a judicial finding establishing misconduct.

843. Defendant THE CITY OF NEW YORK never proved the Charges and Specifications.

844. Plaintiff alleges that defendants THE CITY OF NEW YORK and JESSICA S. TISCH nevertheless permitted unresolved and unproven Charges and Specifications to be used as leverage to pressure plaintiff toward retirement and separation.

845. Defendant TISCH, as Police Commissioner, had supervisory, disciplinary, administrative, corrective, and ratification authority over the NYPD disciplinary process.

846. Defendant TISCH had a duty to ensure that NYPD employees were not deprived of disciplinary fairness, employment protections, retirement-related interests, firearm-related interests, or professional standing based upon unproven allegations.

847. Defendant TISCH had a duty to ensure that disciplinary charges were not used as punishment by accusation.

848. Defendant TISCH had a duty to ensure that unresolved allegations were not treated as adjudicated misconduct.

849. The proposed Negotiated Settlement would have required plaintiff to accept a 30-day suspension, file immediately for Service Retirement with no withdrawal permitted, forfeit accrued time and leave balances except Terminal Leave as a lump sum, separate 30 days after filing for Service Retirement, and serve one year of dismissal probation subject to extensions.

850. Plaintiff alleges that those terms attempted to convert unproven allegations into discipline, forfeiture, forced retirement, and continuing employment vulnerability.

851. Plaintiff was not modified before she filed her 2026 retirement papers.

852. Plaintiff was not suspended before she filed her 2026 retirement papers.

853. Plaintiff was not suspended when she filed her 30-day retirement notice.

854. Plaintiff retained her firearm during the 30-day notice period.

855. Plaintiff filed her 2026 retirement papers on April 7, 2026.

856. Plaintiff alleges that the retirement filing occurred while the Charges and Specifications remained unresolved and unproven.

857. Plaintiff alleges that the retirement filing occurred before the Department had responded to a March 31, 2026 proposal from the Captains Endowment Association seeking to permit plaintiff to retire in good standing in exchange for Terminal Leave paid as a lump sum.

858. Plaintiff alleges that defendant THE CITY OF NEW YORK's failure to respond to that proposal before plaintiff filed her retirement papers contributed to the forced-retirement pressure.

859. Plaintiff was told that the Department was forcing plaintiff to retire.

860. Plaintiff objected and asked, in substance, "For what?"

861. Plaintiff was told, in substance, that suspension was what the Department wanted from its perspective.

862. Plaintiff was further told, in substance, that because it had not been 10 years from plaintiff's last incident, the penalty matrix required a worse penalty.

863. Plaintiff alleges that the "last incident" referenced was the 2017 Patrol Borough Manhattan North disciplinary matter, Case No. 2017-17224, closed on or about March 23, 2017.

864. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH permitted the 2017 matter to be used as a penalty-matrix aggravator even though the 2026 Charges and Specifications remained unresolved and unproven.

865. Plaintiff was also told that if she did not sign, she risked losing her firearm and being placed in a national flagging system.

866. Plaintiff alleges that the threat of firearm loss and national flagging materially increased the pressure to retire.

867. Plaintiff alleges that the choice presented to her was not a meaningful negotiation.

868. Plaintiff alleges that the choice presented to her was to accept discipline and retire on unresolved and unproven charges, or refuse and face suspension, trial in absentia, termination exposure, firearm consequences, and national-flagging consequences.

869. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH permitted the Charges and Specifications to be used as leverage even though no misconduct had been proven.

870. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH treated accusation as adjudication.

871. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH allowed punishment by accusation.

872. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH failed to protect plaintiff's due-process interests, employment interests, retirement-related interests, firearm-related interests, reputation, and professional standing.

873. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's reliance on unresolved and unproven allegations violated the New York State Human Rights Law and the New York City Human Rights Law.

K. Continuing Harm and Post-Separation Consequences

874. Plaintiff realleges and incorporates by reference all prior paragraphs as if fully set forth herein.

875. Plaintiff alleges that the harm did not end when plaintiff filed her 2026 retirement papers.

876. Plaintiff alleges that defendants THE CITY OF NEW YORK and JESSICA S. TISCH permitted unresolved and unproven allegations to remain part of plaintiff's disciplinary, employment, and retirement-related record.

877. Plaintiff did not plead guilty to the Charges and Specifications.

878. Plaintiff did not admit misconduct.

879. Plaintiff did not receive a department trial.

880. Defendant THE CITY OF NEW YORK did not obtain a finding of guilt.

881. Defendant THE CITY OF NEW YORK did not obtain a final disciplinary adjudication establishing misconduct.

882. Defendant THE CITY OF NEW YORK did not obtain a judicial finding establishing misconduct.

883. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH nevertheless allowed the unresolved and unproven Charges and Specifications to damage plaintiff's professional standing, retirement posture, reputation, and post-separation interests.

884. Plaintiff alleges that the continued existence and use of unproven allegations impaired plaintiff's ability to leave the NYPD with the professional standing she had earned during approximately twenty-six years of service.

885. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct damaged plaintiff's reputation inside the NYPD.

886. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct damaged plaintiff's reputation outside the NYPD.

887. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct impaired plaintiff's ability to present herself publicly and professionally as a retired NYPD Inspector in good standing.

888. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct impaired plaintiff's post-retirement employment opportunities.

889. Plaintiff alleges that plaintiff's post-retirement employment prospects depended, in part, on her rank, reputation, disciplinary standing, firearm-related standing, command history, and ability to represent that she retired honorably from the NYPD.

890. Plaintiff alleges that the unresolved and unproven Charges and Specifications caused stigma and uncertainty concerning plaintiff's disciplinary standing.

891. Plaintiff alleges that the unresolved and unproven Charges and Specifications caused stigma and uncertainty concerning plaintiff's firearm-related interests.

892. Plaintiff alleges that the unresolved and unproven Charges and Specifications caused stigma and uncertainty concerning plaintiff's retirement-related interests.

893. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct caused economic loss.

894. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct caused loss of pay, benefits, accrued time, leave balances, retirement-related compensation, and other employment-related value.

895. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct caused loss of command prestige, loss of command authority, loss of promotional opportunity, and loss of future earning capacity.

896. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct caused emotional distress, humiliation, embarrassment, anxiety, and reputational injury.

897. Plaintiff alleges that the removal from TARU, reassignment to Patrol Borough Brooklyn South, unproven Charges and Specifications, forced-retirement pressure, and continuing reliance on unresolved allegations formed one continuing adverse sequence.

898. Plaintiff alleges that this continuing sequence would reasonably deter an employee from complaining about discrimination, hostile work environment, retaliation, selective enforcement, medical disregard, or command misconduct.

899. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH allowed the disciplinary process to become punishment by accusation.

900. Plaintiff alleges that punishment by accusation caused post-separation harm because the Department never proved the allegations but allowed the allegations to affect plaintiff's professional standing and retirement posture.

901. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH failed to protect plaintiff's due-process interests, employment interests, retirement-related interests, firearm-related interests, reputation, and professional standing.

902. Plaintiff alleges that the continuing harm flowed from plaintiff's gender, protected complaints, protected association with Black and Hispanic officers, opposition to discriminatory command practices, and the Department's failure to correct known discrimination and retaliation.

903. Plaintiff alleges that defendants THE CITY OF NEW YORK and TISCH's conduct violated the New York State Human Rights Law and the New York City Human Rights Law.

904. Plaintiff seeks all damages and equitable relief available under law for the continuing harm and post-separation consequences alleged herein.

CONCLUSION

905. Plaintiff served the NYPD for approximately twenty-six years, rose to the rank of Inspector, and performed effectively when treated fairly and supported according to her rank, experience, and qualifications.

906. Plaintiff alleges that THE CITY OF NEW YORK, through the NYPD, permitted gender discrimination, hostile work environment, retaliation, selective enforcement, medical disregard, and punishment by accusation to affect plaintiff's assignments, authority, command support, discipline, retirement posture, and professional standing.

907. Plaintiff alleges that JESSICA S. TISCH, as Police Commissioner, permitted unresolved and unproven Charges and Specifications to be used against plaintiff without a plea, trial, finding of guilt, final disciplinary adjudication, or judicial finding establishing misconduct, and failed to ensure that plaintiff's disciplinary and due-process interests were protected.

908. Plaintiff alleges that KAZ DAUGHTRY, MICHAEL J. LIPETRI, JEFFREY B. MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY each participated in, enabled, ratified, failed to correct, or benefited from the discriminatory and retaliatory command practices alleged herein.

909. Plaintiff did not plead guilty, did not receive a department trial, and was never found guilty of the Charges and Specifications.

910. Plaintiff alleges that unresolved and unproven allegations were nevertheless treated as established misconduct and used to pressure plaintiff's separation.

911. Plaintiff alleges that defendants' conduct caused economic loss, reputational harm, emotional distress, loss of command standing, loss of retirement-related interests, impairment of post-retirement opportunities, and other damages.

912. Plaintiff alleges that defendants violated the New York State Human Rights Law and the New York City Human Rights Law.

913. Therefore, plaintiff demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, KAZ DAUGHTRY, MICHAEL J. LIPETRI, JEFFREY B. MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY, jointly and severally where permitted by law, awarding all relief available under law, including compensatory damages, back pay, front pay, lost benefits, lost accruals, retirement-related losses, emotional-distress damages, punitive damages where available, declaratory relief, injunctive relief, pre-judgment and post-judgment interest, attorneys' fees, costs, disbursements, and such other and further relief as the Court deems just and proper.

VIOLATIONS AND CLAIMS ALLEGED

COUNT I

Gender Discrimination Under the NYSHRL N.Y. Executive Law §§ 296(1) and 296(6) Against All Defendants

914. Plaintiff realleges and incorporates by reference all prior paragraphs as if fully set forth herein.

915. Plaintiff is a woman and, at all relevant times, was protected from gender discrimination under the New York State Human Rights Law ("NYSHRL").

916. Defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the NYSHRL.

917. The NYSHRL prohibits an employer from discriminating against an employee in the terms, conditions, privileges, and conditions of employment because of gender.

918. The NYSHRL further prohibits any person from aiding, abetting, inciting, compelling, or coercing discriminatory conduct forbidden under the statute.

919. Defendant THE CITY OF NEW YORK discriminated against plaintiff because of gender by denying plaintiff equal authority, equal support, operational discretion, command dignity, Executive Officer support, personnel resources, disciplinary fairness, and equal treatment in comparison to male executives and favored male command actors.

920. Defendant JESSICA S. TISCH, as Police Commissioner, participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by allowing unresolved and unproven Charges and Specifications to be used against plaintiff without a plea, trial, finding of guilt, final disciplinary adjudication, or judicial finding establishing misconduct, and by failing to protect plaintiff's disciplinary fairness, due-process interests, retirement-related interests, firearm-related interests, reputation, and professional standing.

921. Defendant KAZ DAUGHTRY participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by exercising operational and supervisory authority over plaintiff and TARU, failing to provide or secure the Executive Officer and personnel support plaintiff repeatedly requested, imposing unrealistic operational expectations, and leaving plaintiff unsupported while male command actors and plaintiff's male successor received materially better treatment.

922. Defendant MICHAEL J. LIPETRI participated in, approved, ratified, permitted, or benefited from gender-based discrimination by participating in, supporting, or benefiting from the command network through which plaintiff was removed from TARU and replaced by Deputy

Inspector Kevin R. Cain, a lower-ranked male successor connected to LIPETRI and CHELL, who immediately received the Executive Officer and personnel support plaintiff had been denied.

923. Defendant JEFFREY B. MADDREY participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by placing plaintiff into TARU to change a discriminatory culture, failing to provide the support necessary for plaintiff to succeed in that known environment, failing to correct discriminatory command conditions, and shifting the burden of those conditions onto plaintiff while male command actors remained uncorrected.

924. Defendant JOHN M. CHELL participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by exercising operational authority over plaintiff and TARU, disregarding plaintiff's operational circumstances, treating plaintiff differently from her male successor, participating in the operational circle controlling TARU, and participating in the conditions that led to plaintiff's removal from TARU.

925. Defendant JOSEPH E. KENNY participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by repeatedly denigrating Field Intelligence Officer experience despite knowing plaintiff's firearms-investigation background, thereby helping undermine plaintiff's authority, expertise, and command standing in Gun Violence.

926. The individual defendants aided and abetted gender discrimination by personally participating in, approving, ratifying, condoning, enabling, or failing to correct the discriminatory conduct alleged herein.

927. Gender was a motivating factor in the adverse treatment plaintiff suffered.

928. As a direct and proximate result of defendants' violations of the NYSHRL, plaintiff suffered damages.

929. Plaintiff is entitled to all relief available under the NYSHRL.

COUNT II
Hostile Work Environment Under the NYSHRL
N.Y. Executive Law §§ 296(1) and 296(6)
Against All Defendants

930. Plaintiff realleges and incorporates by reference all prior paragraphs as if fully set forth herein.

931. Plaintiff is a woman and, at all relevant times, was protected from a gender-based hostile work environment under the NYSHRL.

932. Defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the NYSHRL.

933. The NYSHRL prohibits an employer from subjecting an employee to inferior terms, conditions, or privileges of employment because of gender, including through a hostile work environment.

934. The NYSHRL further prohibits any person from aiding, abetting, inciting, compelling, or coercing hostile work environment discrimination forbidden under the statute.

935. Defendant THE CITY OF NEW YORK subjected plaintiff to a hostile work environment by permitting senior-command practices in which plaintiff was bypassed, undermined, second-guessed, isolated, denied support, denied equal authority, subjected to gendered and sexualized treatment, and treated as less authoritative than male command actors.

936. Defendant JESSICA S. TISCH, as Police Commissioner, permitted, ratified, or failed to correct the continuation of hostile and retaliatory conditions by allowing unproven allegations to be treated as established misconduct and by failing to protect plaintiff's disciplinary fairness, due-process interests, retirement-related interests, firearm-related interests, and professional standing.

937. Defendant KAZ DAUGHTRY contributed to the hostile work environment by exercising operational and supervisory authority over plaintiff and TARU while failing to provide necessary Executive Officer and personnel support, imposing unrealistic operational expectations, and leaving plaintiff exposed to heightened scrutiny without the support afforded to male command actors.

938. Defendant MICHAEL J. LIPETRI contributed to the hostile work environment by participating in, approving, ratifying, or benefiting from the command network that removed plaintiff from TARU and installed a lower-ranked male successor who immediately received support plaintiff had been denied.

939. Defendant JEFFREY B. MADDREY contributed to the hostile work environment by having actual notice of plaintiff's complaints about discriminatory and hostile command conditions, failing to investigate or remediate those conditions, inducing plaintiff to withdraw retirement papers without protecting her from further discrimination, and placing plaintiff into TARU to change a discriminatory culture without providing the support necessary to protect her.

940. Defendant JOHN M. CHELL contributed to the hostile work environment by exercising operational authority over plaintiff and TARU, disregarding plaintiff's operational and medical circumstances, displaying animus toward plaintiff concerning Skydio-related matters, treating plaintiff differently from her male successor, and participating in the command conditions that led to plaintiff's removal from TARU.

941. Defendant JOSEPH E. KENNY contributed to the hostile work environment by repeatedly denigrating Field Intelligence Officer experience despite knowing plaintiff's firearms-investigation background, thereby undermining plaintiff's authority, expertise, and command standing in a male-dominated Detective Bureau environment.

942. The hostile work environment altered plaintiff's terms, conditions, and privileges of employment by depriving plaintiff of equal authority, equal support, command dignity, operational discretion, professional standing, and disciplinary fairness.

943. The individual defendants aided and abetted the hostile work environment by personally participating in, approving, ratifying, condoning, enabling, or failing to correct the hostile conduct alleged herein.

944. Gender was a motivating factor in the hostile work environment plaintiff suffered.

945. As a direct and proximate result of defendants' violations of the NYSHRL, plaintiff suffered damages.

946. Plaintiff is entitled to all relief available under the NYSHRL.

COUNT III
Retaliation Under the NYSHRL
N.Y. Executive Law §§ 296(7) and 296(6)
Against All Defendants

947. Plaintiff realleges and incorporates by reference all prior paragraphs as if fully set forth herein.

948. Plaintiff engaged in protected activity under the NYSHRL by complaining about discriminatory and hostile command conditions, opposing discriminatory treatment, resisting unequal command practices, and supporting Black and Hispanic officers.

949. Defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the NYSHRL.

950. The NYSHRL prohibits retaliation against an employee because the employee opposed practices forbidden by the NYSHRL, complained about discrimination, or otherwise engaged in protected activity.

951. The NYSHRL further prohibits any person from aiding, abetting, inciting, compelling, or coercing retaliation forbidden under the statute.

952. Defendant THE CITY OF NEW YORK retaliated against plaintiff by failing to remediate her protected complaints, denying plaintiff equal support and authority, denying plaintiff TARU resources, permitting anonymous-letter-driven IAB escalation, removing plaintiff from TARU, replacing plaintiff with a lower-ranked male successor who immediately received the support plaintiff had been denied, issuing or relying upon unresolved and unproven Charges and Specifications, and pressuring plaintiff's separation.

953. Defendant JESSICA S. TISCH, as Police Commissioner, participated in, approved, ratified, permitted, or failed to correct retaliation by allowing unresolved and unproven Charges and Specifications to be used against plaintiff after protected activity and by failing to ensure that disciplinary accusations were not treated as adjudicated misconduct.

954. Defendant KAZ DAUGHTRY participated in, approved, ratified, permitted, or failed to correct retaliation by failing to provide or secure the support plaintiff repeatedly requested after protected activity, imposing unrealistic operational expectations, and participating in the unsupported TARU command environment that preceded plaintiff's removal.

955. Defendant MICHAEL J. LIPETRI participated in, approved, ratified, permitted, or benefited from retaliation by participating in, supporting, or benefiting from the command network through which plaintiff was removed from TARU after protected activity and replaced by a lower-ranked male successor who immediately received the support plaintiff had been denied.

956. Defendant JEFFREY B. MADDREY participated in, approved, ratified, permitted, or failed to correct retaliation by receiving plaintiff's protected complaints, failing to

investigate or remediate them, inducing plaintiff to withdraw retirement papers without protecting her from further retaliation, and placing plaintiff into another discriminatory environment without necessary support.

957. Defendant JOHN M. CHELL participated in, approved, ratified, permitted, or failed to correct retaliation by exercising operational authority over plaintiff and TARU, disregarding plaintiff's medical and operational circumstances, participating in the command conditions that led to plaintiff's removal from TARU, and treating plaintiff less favorably than her male successor after plaintiff had engaged in protected activity.

958. Defendant JOSEPH E. KENNY participated in, approved, ratified, permitted, or failed to correct retaliatory and hostile conditions by contributing to the Detective Bureau environment that undermined plaintiff's authority after plaintiff opposed discriminatory command practices and complained about hostile conditions.

959. The individual defendants aided and abetted retaliation by personally participating in, approving, ratifying, condoning, enabling, or failing to correct the retaliatory conduct alleged herein.

960. Plaintiff suffered materially adverse actions and retaliatory treatment, including denial of equal support, denial of equal authority, removal from TARU, diminished assignment to Patrol Borough Brooklyn South, selective disciplinary escalation, reliance on unresolved and unproven Charges and Specifications, forced-retirement pressure, reputational harm, and post-separation consequences.

961. Plaintiff's protected activity was a motivating factor in the retaliatory conduct alleged herein.

962. As a direct and proximate result of defendants' violations of the NYSHRL, plaintiff suffered damages.

963. Plaintiff is entitled to all relief available under the NYSHRL.

COUNT IV
Gender Discrimination Under the NYCHRL
N.Y.C. Administrative Code §§ 8-107(1)(a) and 8-107(6)
Against All Defendants

964. Plaintiff realleges and incorporates by reference all prior paragraphs as if fully set forth herein.

965. Plaintiff is a woman and, at all relevant times, was protected from gender discrimination under the New York City Human Rights Law ("NYCHRL").

966. Defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the NYCHRL.

967. The NYCHRL prohibits an employer from discriminating against an employee in the terms, conditions, and privileges of employment because of gender.

968. The NYCHRL must be construed liberally and independently to accomplish the broad and remedial purposes of the statute.

969. The NYCHRL further prohibits any person from aiding, abetting, inciting, compelling, or coercing discriminatory conduct forbidden under the statute.

970. Defendant THE CITY OF NEW YORK discriminated against plaintiff because of gender by treating plaintiff less well than male executives and favored male command actors, including by denying plaintiff equal authority, equal support, operational discretion, command dignity, Executive Officer support, personnel resources, disciplinary fairness, and equal treatment.

971. Defendant JESSICA S. TISCH, as Police Commissioner, participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by allowing unresolved and unproven Charges and Specifications to be used against plaintiff without a plea, trial, finding of guilt, final disciplinary adjudication, or judicial finding establishing misconduct, and by failing to protect plaintiff's disciplinary fairness, due-process interests, retirement-related interests, firearm-related interests, reputation, and professional standing.

972. Defendant KAZ DAUGHTRY participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by exercising operational and supervisory authority over plaintiff and TARU, failing to provide or secure the Executive Officer and personnel support plaintiff repeatedly requested, imposing unrealistic operational expectations, and leaving plaintiff unsupported while male command actors and plaintiff's male successor received materially better treatment.

973. Defendant MICHAEL J. LIPETRI participated in, approved, ratified, permitted, or benefited from gender-based discrimination by participating in, supporting, or benefiting from the command network through which plaintiff was removed from TARU and replaced by Deputy Inspector Kevin R. Cain, a lower-ranked male successor connected to LIPETRI and CHELL, who immediately received the Executive Officer and personnel support plaintiff had been denied.

974. Defendant JEFFREY B. MADDREY participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by placing plaintiff into TARU to change a discriminatory culture, failing to provide the support necessary for plaintiff to succeed in that known environment, failing to correct discriminatory command conditions, and shifting the burden of those conditions onto plaintiff while male command actors remained uncorrected.

975. Defendant JOHN M. CHELL participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by exercising operational authority over plaintiff and TARU, disregarding plaintiff's operational circumstances, treating plaintiff differently from her male successor, participating in the operational circle controlling TARU, and participating in the conditions that led to plaintiff's removal from TARU.

976. Defendant JOSEPH E. KENNY participated in, approved, ratified, permitted, or failed to correct gender-based discrimination by repeatedly denigrating Field Intelligence Officer experience despite knowing plaintiff's firearms-investigation background, thereby helping undermine plaintiff's authority, expertise, and command standing in Gun Violence.

977. The individual defendants aided and abetted gender discrimination by personally participating in, approving, ratifying, condoning, enabling, or failing to correct the discriminatory conduct alleged herein.

978. Plaintiff's gender was a motivating factor in defendants' conduct.

979. Defendants' conduct caused plaintiff to be treated less well, at least in part, because of gender.

980. As a direct and proximate result of defendants' violations of the NYCHRL, plaintiff suffered damages.

981. Plaintiff is entitled to all relief available under the NYCHRL.

COUNT V
Hostile Work Environment Under the NYCHRL
N.Y.C. Administrative Code §§ 8-107(1)(a) and 8-107(6)
Against All Defendants

982. Plaintiff realleges and incorporates by reference all prior paragraphs as if fully set forth herein.

983. Plaintiff is a woman and, at all relevant times, was protected from a gender-based hostile work environment under the NYCHRL.

984. Defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the NYCHRL.

985. The NYCHRL prohibits an employer from subjecting an employee to inferior terms, conditions, or privileges of employment because of gender, including through a hostile work environment.

986. Under the NYCHRL, plaintiff need not prove that the hostile work environment was severe or pervasive; it is sufficient that plaintiff was treated less well, at least in part, because of gender.

987. The NYCHRL further prohibits any person from aiding, abetting, inciting, compelling, or coercing hostile work environment discrimination forbidden under the statute.

988. Defendant THE CITY OF NEW YORK subjected plaintiff to a hostile work environment by permitting senior-command practices in which plaintiff was bypassed, undermined, second-guessed, isolated, denied support, denied equal authority, subjected to gendered and sexualized treatment, treated as less authoritative than male command actors, and punished by accusation.

989. Defendant JESSICA S. TISCH, as Police Commissioner, permitted, ratified, or failed to correct the continuation of hostile and retaliatory conditions by allowing unproven allegations to be treated as established misconduct and by failing to protect plaintiff's disciplinary fairness, due-process interests, retirement-related interests, firearm-related interests, and professional standing.

990. Defendant KAZ DAUGHTRY contributed to the hostile work environment by exercising operational and supervisory authority over plaintiff and TARU while failing to provide necessary Executive Officer and personnel support, imposing unrealistic operational expectations, and leaving plaintiff exposed to heightened scrutiny without the support afforded to male command actors.

991. Defendant MICHAEL J. LIPETRI contributed to the hostile work environment by participating in, approving, ratifying, or benefiting from the command network that removed plaintiff from TARU and installed a lower-ranked male successor who immediately received support plaintiff had been denied.

992. Defendant JEFFREY B. MADDREY contributed to the hostile work environment by having actual notice of plaintiff's complaints about discriminatory and hostile command conditions, failing to investigate or remediate those conditions, inducing plaintiff to withdraw retirement papers without protecting her from further discrimination, and placing plaintiff into TARU to change a discriminatory culture without providing the support necessary to protect her.

993. Defendant JOHN M. CHELL contributed to the hostile work environment by exercising operational authority over plaintiff and TARU, disregarding plaintiff's operational and medical circumstances, displaying animus toward plaintiff concerning Skydio-related matters, treating plaintiff differently from her male successor, and participating in the command conditions that led to plaintiff's removal from TARU.

994. Defendant JOSEPH E. KENNY contributed to the hostile work environment by repeatedly denigrating Field Intelligence Officer experience despite knowing plaintiff's firearms-investigation background, thereby undermining plaintiff's authority, expertise, and command standing in a male-dominated Detective Bureau environment.

995. The hostile work environment caused plaintiff to be treated less well, at least in part, because of gender.

996. The hostile work environment deprived plaintiff of equal authority, equal support, command dignity, operational discretion, professional standing, disciplinary fairness, and equal treatment.

997. The individual defendants aided and abetted the hostile work environment by personally participating in, approving, ratifying, condoning, enabling, or failing to correct the hostile conduct alleged herein.

998. Plaintiff's gender was a motivating factor in the hostile work environment alleged herein.

999. As a direct and proximate result of defendants' violations of the NYCHRL, plaintiff suffered damages.

1000. Plaintiff is entitled to all relief available under the NYCHRL.

COUNT VI
Retaliation Under the NYCHRL
N.Y.C. Administrative Code §§ 8-107(7) and 8-107(6)
Against All Defendants

1001. Plaintiff realleges and incorporates by reference all prior paragraphs as if fully set forth herein.

1002. Plaintiff engaged in protected activity under the NYCHRL by complaining about discriminatory and hostile command conditions, opposing discriminatory treatment, resisting unequal command practices, and supporting Black and Hispanic officers.

1003. Defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of the NYCHRL.

1004. The NYCHRL prohibits retaliation against an employee because the employee opposed practices forbidden by the NYCHRL, complained about discrimination, or otherwise engaged in protected activity.

1005. Under the NYCHRL, retaliation includes conduct reasonably likely to deter a person from engaging in protected activity.

1006. The NYCHRL further prohibits any person from aiding, abetting, inciting, compelling, or coercing retaliation forbidden under the statute.

1007. Defendant THE CITY OF NEW YORK retaliated against plaintiff by failing to remediate her protected complaints, denying plaintiff equal support and authority, denying plaintiff TARU resources, permitting anonymous-letter-driven IAB escalation, removing plaintiff from TARU, replacing plaintiff with a lower-ranked male successor who immediately received the support plaintiff had been denied, issuing or relying upon unresolved and unproven Charges and Specifications, pressuring plaintiff's separation, and allowing post-separation consequences to continue.

1008. Defendant JESSICA S. TISCH, as Police Commissioner, participated in, approved, ratified, permitted, or failed to correct retaliation by allowing unresolved and unproven Charges and Specifications to be used against plaintiff after protected activity and by failing to ensure that disciplinary accusations were not treated as adjudicated misconduct.

1009. Defendant KAZ DAUGHTRY participated in, approved, ratified, permitted, or failed to correct retaliation by failing to provide or secure the support plaintiff repeatedly requested after protected activity, imposing unrealistic operational expectations, and participating in the unsupported TARU command environment that preceded plaintiff's removal.

1010. Defendant MICHAEL J. LIPETRI participated in, approved, ratified, permitted, or benefited from retaliation by participating in, supporting, or benefiting from the command network through which plaintiff was removed from TARU after protected activity and replaced by a lower-ranked male successor who immediately received the support plaintiff had been denied.

1011. Defendant JEFFREY B. MADDREY participated in, approved, ratified, permitted, or failed to correct retaliation by receiving plaintiff's protected complaints, failing to investigate or remediate them, inducing plaintiff to withdraw retirement papers without protecting her from further retaliation, and placing plaintiff into another discriminatory environment without necessary support.

1012. Defendant JOHN M. CHELL participated in, approved, ratified, permitted, or failed to correct retaliation by exercising operational authority over plaintiff and TARU, disregarding plaintiff's medical and operational circumstances, participating in the command conditions that led to plaintiff's removal from TARU, and treating plaintiff less favorably than her male successor after plaintiff had engaged in protected activity.

1013. Defendant JOSEPH E. KENNY participated in, approved, ratified, permitted, or failed to correct retaliatory and hostile conditions by contributing to the Detective Bureau environment that undermined plaintiff's authority after plaintiff opposed discriminatory command practices and complained about hostile conditions.

1014. The individual defendants aided and abetted retaliation by personally participating in, approving, ratifying, condoning, enabling, or failing to correct the retaliatory conduct alleged herein.

1015. Defendants' conduct was reasonably likely to deter a person from complaining about discrimination, opposing hostile treatment, resisting unequal command practices, supporting protected employees, or otherwise engaging in protected activity.

1016. Plaintiff's protected activity was a motivating factor in defendants' retaliatory conduct.

1017. As a direct and proximate result of defendants' violations of the NYCHRL, plaintiff suffered damages.

1018. Plaintiff is entitled to all relief available under the NYCHRL.

JURY TRIAL

1019. Plaintiff DANIELLE E. RAIA hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff DANIELLE E. RAIA respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, KAZ DAUGHTRY, MICHAEL J. LIPETRI, JEFFREY B. MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY, 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 and the New York City Human Rights Law;
- b. Awarding plaintiff compensatory damages for economic loss, lost compensation, lost benefits, reputational harm, emotional distress, humiliation, embarrassment, loss of command standing, impairment of professional standing, impairment of post-retirement employment opportunities, and all other compensable injuries;

- b. Awarding plaintiff back pay, front pay, lost benefits, lost accruals, lost leave, lost time balances, retirement-related losses, and all other employment-related and retirement-related monetary losses;
- c. Directing defendants THE CITY OF NEW YORK and JESSICA S. TISCH to restore, issue, approve, or cause to be issued plaintiff's Good-Guy Letter, without reliance upon unresolved or unproven Charges and Specifications;
- d. Directing defendants THE CITY OF NEW YORK and JESSICA S. TISCH to restore, issue, approve, or cause to be issued plaintiff's unrestricted retired NYPD police identification card, without reliance upon unresolved or unproven Charges and Specifications;
- e. Directing defendants THE CITY OF NEW YORK and JESSICA S. TISCH to restore, issue, approve, process, or refrain from interfering with plaintiff's retired police officer handgun-license status, including such retired officer handgun license, credential, endorsement, verification, or Department-issued documentation as enables plaintiff to obtain and maintain certification under the Law Enforcement Officers Safety Act, commonly known as H.R. 218;
- f. Directing defendants THE CITY OF NEW YORK and JESSICA S. TISCH to remove, correct, seal, annotate, or otherwise neutralize any NYPD disciplinary, personnel, retirement, firearm-related, credential-related, or employment record that treats unresolved and unproven Charges and Specifications as established misconduct;
- g. Directing defendants THE CITY OF NEW YORK and JESSICA S. TISCH to restore, credit, pay, or compensate plaintiff for all forfeited time, leave

balances, accrued benefits, terminal leave, compensatory time, vacation time, sick-leave-related balances where compensable, and all other related retirement benefits and employment benefits wrongfully withheld, forfeited, impaired, or reduced;

- h. Awarding plaintiff all retirement-related benefits, credits, payments, adjustments, differentials, and other relief necessary to place plaintiff in the position she would have occupied absent defendants' unlawful conduct;
- i. Awarding plaintiff punitive damages against the individual defendants where available under law;
- j. Awarding plaintiff pre-judgment and post-judgment interest;
- k. Awarding plaintiff reasonable attorneys' fees, costs, expenses, and disbursements; and
- l. Awarding plaintiff such other and further legal, equitable, declaratory, injunctive, and monetary relief as the Court deems just, proper, and equitable.

Dated: July 3, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DANIELLE E. RAIA

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

Website: <http://www.thesandersfirm.com>

ATTORNEY VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

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

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

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

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

Dated: July 3, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DANIELLE E. RAIA

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

INDEX NO.:

DANIELLE E. RAIA

Plaintiff,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, KAZ
DAUGHTRY, MICHAEL J. LIPETRI, JEFFREY B.
MADDREY, JOHN M. CHELL, and JOSEPH E. KENNY

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff DANIELLE E. RAIA

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