

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
OSMAIRYS A. AVILA, PAMELA SOSA and BRITTANY N.
ROMERO

Plaintiffs,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK, JESSICA S. TISCH and JUAN
O. MORAN

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 Plaintiffs' 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.

Venue is proper in Bronx County pursuant to CPLR 503(a) and CPLR 503(c).

Plaintiffs designate Bronx County as the place of trial because a substantial part of the acts and omissions giving rise to plaintiffs' claims occurred in Bronx County.

Defendant JUAN O. MORAN was the commanding officer of the NYPD's 46th Precinct in Bronx County, and the principal discriminatory, sexually hostile, retaliatory, and aiding-and-abetting conduct alleged herein arose from his exercise and abuse of command authority in Bronx County.

Venue is further proper because defendant THE CITY OF NEW YORK is a municipal defendant situated within the City of New York.

Venue is further proper because defendant JESSICA S. TISCH, the Police Commissioner of the City of New York, maintains her official office, performs executive NYPD functions, and exercised or failed to exercise supervisory, policymaking, corrective, and ratification authority within the City of New York.

Venue is further proper because the individually named defendants are New York City Police Department officials, executives, officers, supervisors, or employees whose challenged conduct arose from their official duties within the City of New York.

Venue is further proper because the acts, omissions, discriminatory practices, sexually hostile conduct, retaliatory acts, failures to protect, failures to supervise, failures to correct, and ratification alleged herein occurred within the City of New York, including Bronx County and New York County.

Dated: July 9, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiffs OSMAIRYS A. AVILA,
PAMELA SOSA and BRITTANY N. ROMERO

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Legal Bureau
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46th Precinct
2120 Ryer Avenue
Bronx, N.Y. 10457

SUPREME COURT OF THE STATE OF NEW YORK
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OSMAIRYS A. AVILA, PAMELA SOSA and BRITTANY N.
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Defendants
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Plaintiffs OSMAIRYS A. AVILA, PAMELA SOSA, and BRITTANY N. ROMERO by
their attorney THE SANDERS FIRM, P.C., complaining of defendants THE CITY OF NEW
YORK, JESSICA S. TISCH and JUAN O. MORAN, alleges as follows:

INTRODUCTION

This is a civil-rights action arising from sexual harassment, hostile work environment,
retaliation, and discriminatory treatment inside the New York City Police Department's 46th
Precinct, brought by plaintiffs OSMAIRYS A. AVILA, PAMELA SOSA, and BRITTANY N.
ROMERO against defendant THE CITY OF NEW YORK, Police Commissioner JESSICA S.
TISCH, and Deputy Inspector JUAN O. MORAN.

Plaintiff AVILA is a Latina and Dominican female NYPD Sergeant. Plaintiff SOSA is a
Latina and Dominican female NYPD Police Officer. Plaintiff ROMERO is a Latina female
NYPD Police Officer who is Puerto Rican and Ecuadorian. At all relevant times, plaintiffs were
assigned to the 46th Precinct, worked under MORAN's command authority, and were
subordinate to his rank, supervision, influence, and control.

This case concerns what happened after the NYPD and Commissioner TISCH were already on notice that the 46th Precinct had become a sexually compromised command. In *N.T. v. City of New York and Jeremy Scheublin, Individually*, Index No. 804313/2026E, filed in Supreme Court, Bronx County, a female NYPD officer alleged that former 46th Precinct Commanding Officer Inspector JEREMY SCHEUBLIN sexually harassed, retaliated against, and sexually assaulted her inside the 46th Precinct. Plaintiffs allege that the prior action placed the City, NYPD, and TISCH on notice that the 46th Precinct required heightened scrutiny, credible anti-harassment enforcement, supervision of supervisors, and protection for subordinate female members of service.

Against that backdrop, defendant TISCH allegedly handpicked, selected, approved, assigned, retained, supervised, or permitted defendant MORAN to serve as the commanding officer of the 46th Precinct. MORAN was not sent into a clean command. He was sent into a command already associated with sexual misconduct, supervisory abuse, retaliation, reporting failures, investigative irregularities, and institutional failure. MORAN was supposed to be the reformer. Instead, plaintiffs allege that he became another wolf in sheep's clothing.

Plaintiffs allege that MORAN used his rank and authority as commanding officer to create private access to subordinate female members, blur professional boundaries, pressure them to attend Department-related social events, sexualize them in front of other members of service, touch them without consent, humiliate them publicly, and punish or intimidate them when they resisted, avoided him, declined him, complained, or failed to give him the personal, sexual, or submissive attention he wanted.

As to plaintiff AVILA, MORAN allegedly created private command access, sexualized her Latina identity, pressured her to attend a command-related fishing trip, directed sexualized

photographs, degraded her Dominican national origin, denied her an available Department vehicle, used another supervisor to reach her, and threatened retaliation after she reported him to IAB and OEI.

As to plaintiff SOSA, MORAN allegedly summoned her under the unexplained threat of a UF49, asked personal questions unrelated to police business, pressured her to attend Hispanic Society-related events, sexualized her at Department-related social events, gave her an unwanted tight hug, repeatedly pressured her to dance, untied the knot securing her dress at the NYDO Tipico party, and then allegedly used or caused an unfavorable UF49, Risk Management involvement, and probationary consequences after she rejected, avoided, or failed to submit to his overt sexual advances.

As to plaintiff ROMERO, MORAN allegedly used a command-level bet to create personal access, obtained her phone number, repeatedly told her that she “owed” him, pressured her to attend Department-related events, touched her cheek without consent, made sexualized comments about her dress, divorce, and his pension, repeatedly pressured her to dance, and later apologized by text after being told that he was “out of control” and may have “crossed any lines.”

MORAN’s alleged conduct was not harmless flirting, bad judgment, or awkward social behavior. Plaintiffs allege that it was command-level sexual harassment carried out through rank, access, pressure, humiliation, unwanted touching, Department-related social events, paperwork threats, probationary vulnerability, and retaliation.

Plaintiffs further allege that MORAN’s conduct fits the adult sexual grooming framework described in Grant Sinnamon’s chapter, “The Psychology of Adult Sexual Grooming: Sinnamon’s Seven-Stage Model of Adult Sexual Grooming,” because MORAN allegedly created

personal access, gathered personal information, normalized intimate interactions, blurred professional boundaries, manipulated Department-related social environments, and then used threats, blame, paperwork, probationary vulnerability, workplace consequences, and retaliation to control or punish subordinate members.

Plaintiffs also allege that MORAN's conduct was motivated, at least in part, by plaintiffs' race, ethnicity, and national origin as Latina women, including Dominican, Puerto Rican, and Ecuadorian subordinate female members of service. Plaintiffs allege that MORAN sexualized, stereotyped, degraded, and targeted them through comments, assumptions, and conduct tied to their Latina identity and ethnic-affinity Department spaces, including Hispanic Society-related events and the NYDO Tipico party.

This case is about notice, power, recurrence, and retaliation. The NYPD knew the 46th Precinct had a sexual-misconduct problem. TISCH allegedly installed MORAN as the reformer. Plaintiffs allege that MORAN turned the command into his personal sexual playground, and when Latina female officers resisted, avoided him, declined him, or complained, the Department protected the command structure instead of protecting the women harmed by it.

Plaintiffs bring claims for sex and gender discrimination, race, ethnicity, and national-origin discrimination, hostile work environment, retaliation, and aiding and abetting under the New York State Human Rights Law, Executive Law § 296, and the New York City Human Rights Law, Administrative Code § 8-107.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to Article VI, § 7 of the New York State Constitution because this is a civil action seeking legal and equitable

relief for violations of the New York State Human Rights Law, Executive Law § 296, and the New York City Human Rights Law, Administrative Code § 8-107.

2. This Court has jurisdiction over defendant THE CITY OF NEW YORK because it is a municipal corporation organized and existing under the laws of the State of New York, conducts business within the State of New York, operates the New York City Police Department, and employed plaintiffs and the individual defendants at all relevant times.

3. This Court has jurisdiction over defendant JESSICA S. TISCH because, at all relevant times, she was the Police Commissioner of the City of New York, maintained her official office and performed executive NYPD functions within the City of New York, including New York County, and exercised executive authority over the NYPD policies, practices, supervision, discipline, investigations, and command assignments challenged in this action.

4. This Court has jurisdiction over defendant JUAN O. MORAN because, at all relevant times, he was employed by the NYPD, served as the commanding officer of the 46th Precinct in Bronx County, exercised supervisory and command authority over plaintiffs and other members of service, and committed or participated in the discriminatory, sexually hostile, and retaliatory conduct alleged herein within the City of New York, including Bronx County.

5. This Court has jurisdiction over defendants TISCH and MORAN because, at all relevant times, they were New York City Police Department officials, executives, supervisors, officers, or employees who worked, acted, supervised, investigated, retaliated, aided, abetted, ratified, or failed to act within the City of New York in connection with the events alleged herein.

6. Venue is proper in Bronx County pursuant to CPLR 503(a) and CPLR 503(c).

7. Plaintiffs designate Bronx County as the place of trial because a substantial part of the acts and omissions giving rise to plaintiffs' claims occurred in Bronx County.

8. Defendant JUAN O. MORAN was the commanding officer of the NYPD's 46th Precinct in Bronx County, and the principal discriminatory, sexually hostile, retaliatory, and aiding-and-abetting conduct alleged herein arose from his exercise and abuse of command authority in Bronx County.

9. Venue is further proper because defendant THE CITY OF NEW YORK is a municipal defendant situated within the City of New York; because defendant JESSICA S. TISCH, the Police Commissioner of the City of New York, maintains her official office, performs executive NYPD functions, and exercised or failed to exercise supervisory, policymaking, corrective, and ratification authority within the City of New York; and because the challenged acts, omissions, discriminatory practices, sexually hostile conduct, retaliatory acts, failures to protect, failures to supervise, failures to correct, and ratification alleged herein occurred within the City of New York, including Bronx County and New York County.

10. The discriminatory, sexually hostile, and retaliatory acts alleged herein occurred within the territorial scope of the New York State Human Rights Law and the New York City Human Rights Law because plaintiffs were employed by the NYPD within the City of New York, worked in or were affected by conduct arising from the 46th Precinct in Bronx County, and suffered injuries and adverse employment consequences within the City of New York.

PROCEDURAL REQUIREMENTS

11. Plaintiffs have commenced this action within the applicable statute of limitations.

12. Plaintiffs' claims arise under the New York State Human Rights Law, Executive Law § 296, and the New York City Human Rights Law, Administrative Code § 8-107 et seq.

13. The applicable statute of limitations for claims brought under the New York State Human Rights Law and the New York City Human Rights Law is three years from the date the cause of action accrued.

14. The discriminatory, sexually hostile, and retaliatory conduct alleged herein occurred within three years of the filing of this action.

15. No Notice of Claim is required as a condition precedent to the commencement of this action because plaintiffs' claims are brought pursuant to the New York State Human Rights Law and the New York City Human Rights Law, which do not require service of a Notice of Claim under General Municipal Law § 50-e, General Municipal Law § 50-i, or any other notice-of-claim statute as a prerequisite to suit.

16. Plaintiffs have satisfied all conditions precedent necessary to maintain this action, or such conditions have been waived, excused, or are inapplicable.

17. Plaintiffs demand a trial by jury on all issues so triable.

PLAINTIFF

18. Plaintiff AVILA is a female resident of Bronx County, over the age of eighteen.

19. Plaintiff AVILA is Latina and Dominican.

20. At all relevant times, plaintiff AVILA was, and remains, employed by the New York City Police Department as a Sergeant.

21. During the relevant period, plaintiff AVILA was assigned to the NYPD's 46th Precinct in Bronx County until she was forced to seek a transfer because she could no longer remain in the command under defendant JUAN O. MORAN's authority.

22. At all relevant times, plaintiff AVILA was a subordinate Sergeant under the command authority, supervision, influence, and control of defendant MORAN.

23. Plaintiff SOSA is a female resident of Bronx County, over the age of eighteen.
24. Plaintiff SOSA is Latina and Dominican.
25. At all relevant times, plaintiff SOSA was, and remains, employed by the New York City Police Department as a Police Officer.
26. At all relevant times, plaintiff SOSA was assigned to the NYPD's 46th Precinct in Bronx County.
27. At all relevant times, plaintiff SOSA was a subordinate Police Officer under the command authority, supervision, influence, and control of defendant MORAN.
28. At all relevant times, plaintiff SOSA was a probationary Police Officer or otherwise subject to probationary review, probationary monitoring, performance documentation,
29. Plaintiff BRITTANY N. ROMERO is a female resident of Bronx County, over the age of eighteen.
30. Plaintiff BRITTANY N. ROMERO is a Latina female NYPD Police Officer.
31. Plaintiff ROMERO is Puerto Rican and Ecuadorian.
32. At all relevant times, plaintiff ROMERO was employed by defendant THE CITY OF NEW YORK through the New York City Police Department.
33. At all relevant times, plaintiff ROMERO was assigned to the NYPD's 46th Precinct in Bronx County.
34. At all relevant times, plaintiff ROMERO was subordinate to defendant JUAN O. MORAN's command authority, supervision, influence, and control.
35. Plaintiff ROMERO alleges that defendant MORAN used his rank as commanding officer to create personal access to her, pressure her to attend Department-related social events, repeatedly tell her that she "owed" him, touch her without consent, sexualize her appearance,

pressure her to dance, make sexualized comments about divorce and his pension, and make her feel uncomfortable, targeted, humiliated, and unsafe in the workplace.

36. Plaintiff ROMERO further alleges that defendant MORAN's conduct toward her occurred in the same sexually hostile, discriminatory, retaliatory, and command-compromised environment alleged by plaintiffs AVILA and SOSA.

37. Plaintiff ROMERO alleges that defendant MORAN's conduct was motivated, at least in part, by her sex, gender, race, ethnicity, and national origin as a Latina, Puerto Rican, and Ecuadorian female Police Officer.

38. Plaintiffs AVILA, SOSA and ROMERO were female Latina members of service working inside the same NYPD command, under the same commanding officer, during the same period of alleged sexually hostile, discriminatory, and retaliatory conduct.

39. As alleged herein, plaintiffs were subjected to sex-based, gender-based, race-based, ethnicity-based, and national-origin-based discrimination, sexual harassment, hostile work environment, retaliation, intimidation, and other unlawful conduct under the New York State Human Rights Law and the New York City Human Rights Law.

DEFENDANTS

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

41. Defendant THE CITY OF NEW YORK operates, manages, controls, funds, supervises, and is responsible for the New York City Police Department.

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

43. At all relevant times, defendant THE CITY OF NEW YORK acted through the NYPD, its executives, supervisors, commanding officers, officers, employees, agents, departments, bureaus, divisions, and representatives.

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

45. At all relevant times, defendant TISCH was employed by defendant THE CITY OF NEW YORK and acted under color of her authority as Police Commissioner.

46. At all relevant times, defendant TISCH exercised executive authority over the NYPD, including authority over command assignments, executive staffing, discipline, supervision, internal investigations, equal-employment practices, anti-harassment enforcement, retaliation prevention, and the maintenance of lawful workplace conditions.

47. At all relevant times, defendant TISCH knew or should have known that the 46th Precinct had been associated with serious allegations of sexual misconduct, supervisory abuse, inappropriate supervisor-subordinate relationships, retaliation, and institutional failure.

48. At all relevant times, defendant TISCH allegedly selected, approved, assigned, retained, supervised, or permitted defendant JUAN O. MORAN to serve as commanding officer of the 46th Precinct despite the command's known history and need for heightened scrutiny, control, and corrective action.

49. Defendant TISCH is sued individually for her direct participation in, approval of, ratification of, deliberate indifference to, and/or aiding and abetting of the discriminatory, sexually hostile, retaliatory, intimidating, and unlawful conduct alleged herein.

50. Defendant JUAN O. MORAN is a Deputy Inspector employed by the New York City Police Department.

51. At all relevant times, defendant MORAN was employed by defendant THE CITY OF NEW YORK and acted under color of his authority as an NYPD Deputy Inspector and commanding officer.

52. At all relevant times, defendant MORAN served as the commanding officer of the NYPD's 46th Precinct in Bronx County.

53. At all relevant times, defendant MORAN exercised command authority, supervisory authority, disciplinary influence, assignment authority, scheduling influence, personnel influence, and practical control over subordinate members of service assigned to the 46th Precinct, including plaintiffs AVILA, SOSA and ROMERO.

54. At all relevant times, defendant MORAN was plaintiffs' superior officer and had the authority, influence, or apparent authority to affect plaintiffs' assignments, tours, overtime opportunities, discipline, performance documentation, probationary status, transfers, sick-leave scrutiny, and working conditions.

55. Defendant MORAN is sued individually for his direct participation in the discriminatory, sexually hostile, retaliatory, intimidating, and aiding-and-abetting conduct alleged herein.

56. Defendant MORAN's acts and omissions were committed within the scope of his NYPD employment, under color of his command authority, and through the power and access provided to him by defendant THE CITY OF NEW YORK.

57. At all relevant times, the individual defendants were agents, employees, supervisors, executives, commanding officers, officers, or representatives of defendant THE CITY OF NEW YORK and the NYPD.

58. At all relevant times, each defendant acted directly, through agents, or in concert with other defendants, and each defendant is liable for the acts and omissions alleged herein to the extent permitted by the New York State Human Rights Law, the New York City Human Rights Law, and applicable law.

BACKGROUND

A. Adult Sexual Grooming as a Framework for Understanding Command-Level Sexual Harassment

59. Plaintiffs allege that the sexual harassment, hostile work environment, discrimination, and retaliation at issue in this case must be understood through the framework of adult sexual grooming.

60. Plaintiffs do not plead adult sexual grooming as a separate cause of action.

61. Plaintiffs plead adult sexual grooming as a factual, behavioral, and evidentiary framework explaining how a person with institutional power may obtain access to adult targets, blur professional boundaries, test resistance, sexualize ordinary interactions, manipulate the surrounding environment, and use fear, shame, retaliation, or institutional control to discourage reporting.

62. In Grant Sinnamon, *“The Psychology of Adult Sexual Grooming: Sinnamon’s Seven-Stage Model of Adult Sexual Grooming,”* adult sexual grooming is described as a process developed to explain predatory sexual behavior involving vulnerable adults, preparatory grooming conduct, and the instigation and maintenance of sexually exploitative or abusive relationships with adult victims.

63. The Sinnamon chapter explains that adult sexual grooming may be difficult to identify because early grooming conduct may appear outwardly ambiguous, unethical, immoral, or merely inappropriate before it becomes more overtly exploitative or abusive.

64. Grooming, in this context, is a process of preparation.

65. It is not always obvious at the beginning because grooming may resemble ordinary kindness, mentoring, professional concern, social inclusion, or workplace familiarity.

66. That ambiguity is what makes adult grooming dangerous in hierarchical workplaces.

67. The Sinnamon chapter explains that sexual grooming involves deliberately establishing a connection with an individual to prepare that person for sexual exploitation or abuse, including by normalizing intimate interactions, blurring the lines between appropriate and inappropriate behavior, desensitizing the target to warning signs, and creating emotional, social, psychological, or physical reinforcement.

68. Adult grooming is especially dangerous where the alleged predator holds rank, authority, status, institutional access, or control over the target's working conditions.

69. In such settings, the target is not dealing with a stranger.

70. The target is dealing with someone who can affect assignments, evaluations, overtime, discipline, transfers, probationary status, reputation, and daily work life.

71. The power imbalance itself becomes part of the coercive environment.

72. The Sinnamon chapter identifies law enforcement and employers among the social positions that may provide inherent trust, authority, respect, and power differentials capable of being misused by a predator.

73. The grooming framework is particularly relevant in a paramilitary police department because rank is not symbolic.

74. Rank controls movement, access, assignments, scheduling, discipline, documentation, opportunities, and informal reputation.

75. In that environment, a superior officer's "invitation" may function like an order.
76. A private office meeting may not feel optional.
77. A social event may not feel voluntary.
78. A request to dance, kiss, pose, attend, drink, remain present, or engage in personal conversation may carry career consequences when made by a commanding officer.
79. Adult grooming also includes environmental manipulation.
80. The Sinnamon chapter explains that grooming the adult victim's environment may include inserting oneself into the target's social space, credentialing oneself as trustworthy or valuable, and deflecting suspicion so that others interpret concerning conduct as harmless, benevolent, misunderstood, or not worth reporting.
81. In a police command, that environmental grooming may operate through command prestige, executive trust, loyalty culture, social events, subordinate compliance, fear of retaliation, and the silence of supervisors who know better.
82. It may also operate through the normalization of crude comments, sexualized jokes, inappropriate relationships, alcohol-centered command events, and the expectation that members should manage misconduct quietly rather than report it.
83. The final stage of adult grooming, as described in the Sinnamon framework, involves control of the victim and the victim's environment through secrecy, guilt, blame, threats, bribery, promises of reward, or other mechanisms of control.
84. In an NYPD command, those control mechanisms may include threats to a member's assignment, tour, overtime, probation, sick record, disciplinary record, transfer opportunities, reputation, and future career.

85. This case arises from plaintiffs' allegation that adult sexual grooming was not merely an interpersonal pattern, but a command-level workplace pattern.

86. Plaintiffs allege that the 46th Precinct became a place where commanding officers and ranking members could use authority, access, social events, silence, and fear to sexualize subordinate members of service.

87. Plaintiffs further allege that this pattern did not begin with defendant MORAN.

88. Under former Inspector JEREMY SCHEUBLIN, the 46th Precinct was already associated with serious allegations of sexual harassment, sexual assault, inappropriate supervisor-subordinate conduct, retaliation, and institutional failure.

89. Plaintiffs allege that the change from SCHEUBLIN to MORAN was supposed to end that command culture.

90. Instead, plaintiffs allege that MORAN continued and deepened the same sexually compromised atmosphere through a new version of command-level access, pressure, humiliation, sexualization, intimidation, and retaliation.

91. Plaintiffs allege that MORAN was not merely another inappropriate supervisor.

92. Plaintiffs allege that MORAN was placed into a command already poisoned by sexual misconduct allegations and then used the authority of that command to make the 46th Precinct his personal sexual playground.

B. The 46th Precinct Was Already a Sexually Compromised Command

93. The 46th Precinct was already a sexually compromised command before defendant MORAN assumed command authority.

94. Plaintiffs AVILA and SOSA were aware, as were many members of service assigned to the 46th Precinct, that the command had a fraternity-like, boorish, and inappropriate work atmosphere.

95. That atmosphere was not merely crude, immature, or unpleasant.

96. It was legally significant because it formed part of the totality of the circumstances in which plaintiffs experienced sexual harassment, hostile work environment, discrimination, retaliation, intimidation, and fear of reporting.

97. The command atmosphere also bears directly on notice, foreseeability, employer liability, supervisory tolerance, failure to correct, and the reason plaintiffs understood defendant MORAN's conduct as coercive rather than merely offensive.

98. The most direct institutional backdrop is the filed Bronx County Supreme Court action captioned *N.T. v. City of New York and Jeremy Scheublin, Individually*, Index No. 804313/2026E.

99. The N.T. action alleged sex and gender discrimination, sexual harassment, hostile work environment, and retaliation under the New York State Human Rights Law and the New York City Human Rights Law arising from conduct inside the 46th Precinct.

100. The N.T. action alleged that former 46th Precinct Commanding Officer Inspector JEREMY SCHEUBLIN sexually assaulted a subordinate female officer while both were on duty and in uniform inside the 46th Precinct, including allegations that he forcibly grabbed her, attempted to kiss her, threw her onto a couch inside his office, and attempted to remove her gun belt.

101. The N.T. action did not describe a private dispute isolated from the workplace.

102. It described alleged command-level sexual misconduct by the commanding officer of the 46th Precinct.

103. It described alleged use of rank, office access, assignment power, workplace pressure, and command culture to pursue, isolate, sexualize, intimidate, and retaliate against a subordinate female officer.

104. The N.T. action alleged that the NYPD operates under a rigid paramilitary chain of command in which directives from a commanding officer carry significant authority and that, in NYPD practice, failure to comply with a commanding officer's directive ordinarily carries immediate professional risk.

105. That command structure matters here because the same rank-based pressure existed when MORAN became the commanding officer of the 46th Precinct.

106. The N.T. action further alleged that Scheublin sought private access to a subordinate female officer, that others within the command allegedly acted as intermediaries or facilitators, and that the plaintiff was pressured to work directly for him.

107. The N.T. action alleged that it was widely rumored within the 46th Precinct that Scheublin had romantic relationships with members of service within the command and at his prior assignment.

108. Those allegations matter because they describe a sexually compromised command ecology, not merely one supervisor's bad conduct.

109. Plaintiffs allege that, before MORAN arrived, the 46th Precinct already had a workplace culture where sexualized access to subordinate members, inappropriate supervisor-subordinate relationships, and rank-based boundary violations were known, rumored, tolerated, or insufficiently corrected.

110. The N.T. action also alleged that supervisors witnessed inappropriate comments by Scheublin and failed to report them to the Office of Equity and Inclusion, despite being mandated reporters of sexual harassment.

111. Plaintiffs allege that this failure to report was part of the command atmosphere: supervisors knew enough to act, but the command culture rewarded silence, avoidance, and institutional self-protection.

112. The N.T. action further alleged that sexualized comments and discussions occurred in the presence of other members of service, including comments about women's appearances, members' sexual relationships, and sexual topics inside the workplace.

113. These allegations are relevant because they show that the sexually hostile atmosphere in the 46th Precinct allegedly extended beyond one closed-door encounter and into the open command environment.

114. The N.T. action also alleged that valuable assignments and specialized positions were implicated in the misconduct and retaliation, including positions with overtime and promotion potential.

115. That matters here because plaintiffs allege that MORAN likewise used the practical machinery of the command, including access, events, vehicles, paperwork, probationary power, sick-leave scrutiny, transfer pressure, and daily working conditions, to control or punish subordinate members.

116. The N.T. action alleged that retaliation was not limited to the female complainant.

117. It alleged that Lieutenant Steven M. Mellerson, who reported the sexual assault allegation, was retaliatorily transferred to the midnight tour despite being one of the more senior lieutenants in the command.

118. It alleged that the complainant was stripped of her partner, that she was directed away from the desk when Scheublin was arriving, that sudden tour changes and pre-tour assignments were used to harass her, and that she received undesirable or punishment posts after her complaint.

119. Those allegations matter because they show the alleged command reaction to a sexual misconduct complaint: isolate the complainant, punish the reporter, alter work conditions, and make the workplace more difficult for those associated with the complaint.

120. The N.T. action also alleged facts suggesting investigative interference and intimidation.

121. After the plaintiff reported the alleged sexual assault, she observed that a surveillance camera within the 46th Precinct command area had been moved; Technical Assistance Response Unit (TARU) personnel responded; TARU allegedly confirmed the camera had been moved; and the repositioned camera had previously captured portions of the area outside Scheublin's office, including his parking spot and the front corner of the precinct.

122. The N.T. action further alleged that after the camera equipment was restored or recovered, the cameras were moved again.

123. Those allegations are relevant because they support plaintiffs' position that the 46th Precinct was not merely sexually crude; it was allegedly institutionally compromised when sexual misconduct allegations threatened command leadership.

124. The N.T. action alleged that, despite the sexual assault allegation and a criminal referral, Scheublin remained on full duty, continued serving in a supervisory capacity, remained armed, and continued to be present in the same facility and command structure as the female officer who accused him.

125. The N.T. action further alleged that the City allowed Scheublin to work full duty for thirteen months after it allegedly learned he sexually assaulted the plaintiff, and that Scheublin still had access to women on the job whom he supervised and his firearm.

126. That allegation is central to this case.

127. Plaintiffs allege that the CITY, NYPD, and TISCH were on notice that the 46th Precinct had a sexual-misconduct problem, a supervisory-abuse problem, a retaliation problem, and a reporting-culture problem.

128. The N.T. action also alleged that, after the complaint became known, Lieutenant Edward T. Lawyerr addressed members of the command, stated that officers needed to be wary of “two-legged rats,” and further stated that the NYPD had “great Jewish lawyers” who would get them out of trouble.

129. The N.T. plaintiff alleged she understood those statements as signaling hostility toward her for reporting Scheublin and as discouraging officers from cooperating with her complaint.

130. Plaintiffs allege that those allegations reflect a command atmosphere where complainants and witnesses could reasonably fear being labeled disloyal, targeted, isolated, retaliated against, or disbelieved.

131. Plaintiffs further allege that this atmosphere made it foreseeable that female members of service would be afraid to report a commanding officer’s sexual misconduct.

132. Plaintiffs AVILA, SOSA and ROMERO did not work in a vacuum.

133. They worked in a command already associated with allegations of sexual predation, sexualized supervisory misconduct, inappropriate relationships, silence by mandated

reporters, retaliation against reporters and allies, investigative irregularities, and institutional delay.

134. Plaintiffs allege that the 46th Precinct did not need cosmetic reform.

135. It needed actual intervention.

136. It needed supervision of supervisors.

137. It needed credible anti-harassment enforcement.

138. It needed protection for female members of service.

139. It needed safeguards against ranking officers using command access, social events, assignments, paperwork, discipline, overtime, probation, and daily working conditions to sexualize or control subordinate members.

140. Plaintiffs AVILA, SOSA and ROMERO wrongfully believed that the change from SCHEUBLIN to MORAN would improve the work atmosphere inside the 46th Precinct.

141. Plaintiffs reasonably expected that a new commanding officer would restore professionalism, discipline, and basic workplace decency.

142. Instead, plaintiffs allege that MORAN became part of the same sexually hostile and retaliatory command culture he was supposedly selected to correct.

143. Plaintiffs allege that MORAN entered a command already stained by serious sexual misconduct allegations and then used the authority of that same command to target, sexualize, humiliate, intimidate, and retaliate against plaintiffs.

144. The 46th Precinct atmosphere is therefore independently relevant to plaintiffs' hostile-work-environment claims because it forms part of the totality of the circumstances.

145. It is relevant to plaintiffs' retaliation claims because it explains why reporting MORAN carried foreseeable career risk.

146. It is relevant to defendant CITY's liability because it supports notice, foreseeability, and failure to take reasonable corrective action.

147. It is relevant to defendant TISCH's liability because MORAN was allegedly placed into a command already requiring heightened scrutiny and meaningful corrective supervision.

148. It is relevant to MORAN's liability because his conduct did not occur in a clean workplace; it occurred inside a command where sexualized abuse of rank had already been normalized, excused, or inadequately addressed.

C. Defendant Tisch Allegedly Selected Moran to Reform the 46th Precinct

149. Defendant JESSICA S. TISCH was the Police Commissioner of the City of New York.

150. As Police Commissioner, defendant TISCH exercised executive authority over the NYPD, including executive authority over command assignments, executive staffing, supervision, discipline, internal investigations, anti-harassment enforcement, retaliation prevention, and the maintenance of lawful workplace conditions.

151. Defendant TISCH knew or should have known that the 46th Precinct was not an ordinary command assignment.

152. Defendant TISCH knew or should have known that the 46th Precinct had already been associated with serious allegations of sexual misconduct, supervisory abuse, inappropriate supervisor-subordinate relationships, retaliation, investigative irregularities, and institutional failure.

153. The 46th Precinct did not require a cosmetic leadership change.

154. It required actual command reform.

155. It required direct executive scrutiny.
156. It required supervision of supervisors.
157. It required reliable reporting channels.
158. It required protection for female members of service.
159. It required a commanding officer who would dismantle the sexually compromised atmosphere, not exploit it.
160. Against that backdrop, defendant TISCH allegedly selected, approved, assigned, retained, supervised, or permitted defendant JUAN O. MORAN to serve as the commanding officer of the 46th Precinct.
161. Plaintiffs allege that MORAN was presented, treated, or understood as the executive answer to the 46th Precinct's prior command failures.
162. MORAN was supposed to restore order.
163. MORAN was supposed to restore professionalism.
164. MORAN was supposed to restore discipline.
165. MORAN was supposed to restore basic workplace decency.
166. MORAN was supposed to ensure that subordinate female members of service were no longer forced to work inside a command culture where ranking officers could sexualize, pressure, intimidate, or retaliate against them.
167. MORAN was supposed to be the reformer.
168. Instead, plaintiffs allege that MORAN became another wolf in sheep's clothing.
169. MORAN did not enter the 46th Precinct as a neutral outsider walking into a clean command.

170. MORAN entered a command where executive leadership already had reason to understand that sexual misconduct, supervisory access, retaliation, silence, and fear of reporting were serious workplace dangers.

171. Defendant TISCH's alleged selection of MORAN is central to this case because it bears directly on notice, foreseeability, supervision, and institutional responsibility.

172. Plaintiffs allege that defendant TISCH and defendant CITY cannot credibly claim surprise that female members of service remained vulnerable to command-level sexual harassment inside the 46th Precinct.

173. The warning signs were already there.

174. The command history was already there.

175. The sexual-misconduct allegations were already there.

176. The retaliation allegations were already there.

177. The mandated-reporter failures were already there.

178. The Department's duty to impose meaningful safeguards was already triggered.

179. Plaintiffs allege that defendant TISCH and defendant CITY failed to impose the safeguards, supervision, reporting protections, and command-level accountability necessary to protect plaintiffs AVILA, SOSA and ROMERO.

180. Plaintiffs further allege that defendant TISCH and defendant CITY failed to ensure that MORAN's conduct was meaningfully monitored after he assumed command of a precinct already associated with sexual misconduct and retaliation.

181. Plaintiffs further allege that defendant TISCH and defendant CITY failed to ensure that subordinate female members of service had a safe, credible, and retaliation-free means to report sexual misconduct by the commanding officer.

182. Plaintiffs further allege that defendant TISCH and defendant CITY failed to protect plaintiffs after MORAN allegedly engaged in the same type of rank-based, sexually hostile, retaliatory conduct that the Department already knew the 46th Precinct was vulnerable to.

183. MORAN's alleged misconduct was therefore not unforeseeable.

184. It was the predictable result of placing another powerful ranking officer into a sexually compromised command without sufficient safeguards, supervision, accountability, or protection for the women working under him.

185. Plaintiffs allege that defendant TISCH and defendant CITY protected the command structure instead of protecting the women harmed by it.

186. Plaintiffs allege that the so-called reform of the 46th Precinct failed because the Department changed the commanding officer without changing the culture, the safeguards, the reporting reality, or the consequences for abuse of rank.

D. Moran's Command Authority, Rank, Access, and Control Over Plaintiffs

187. Defendant JUAN O. MORAN was a Deputy Inspector employed by the NYPD.

188. At all relevant times, defendant MORAN served as the commanding officer of the NYPD's 46th Precinct.

189. As commanding officer, defendant MORAN was not merely another supervisor inside the command.

190. Defendant MORAN was the ranking executive officer responsible for the operation, supervision, discipline, tone, and working environment of the 46th Precinct.

191. Defendant MORAN exercised actual, apparent, and practical authority over subordinate members of service assigned to the 46th Precinct, including plaintiffs AVILA, SOSA and ROMERO.

192. Defendant MORAN's authority included, but was not limited to, authority and influence over assignments, tours, details, overtime opportunities, command placement, office location, post assignments, discipline, performance documentation, personnel evaluations, Form 49-related documentation, probationary monitoring, sick-leave scrutiny, transfer consequences, and daily working conditions.

193. Defendant MORAN's rank mattered.

194. His office mattered.

195. His access mattered.

196. His ability to summon subordinate members into closed spaces mattered.

197. His ability to direct supervisors, influence paperwork, control command resources, affect assignments, and alter working conditions mattered.

198. In the NYPD's paramilitary workplace, a commanding officer's request does not operate like an ordinary invitation.

199. It carries the pressure of rank.

200. It carries the expectation of obedience.

201. It carries the threat of professional consequence.

202. It carries the reality that a subordinate member who refuses, avoids, objects, complains, or resists may be punished through assignments, tours, documentation, overtime, reputation, discipline, transfer pressure, or other workplace consequences.

203. Plaintiff AVILA was a Sergeant assigned to the 46th Precinct and was subordinate to defendant MORAN's command authority.

204. Although plaintiff AVILA held supervisory rank as a Sergeant, she remained subordinate to defendant MORAN, who outranked her, commanded the precinct, and controlled or influenced the working conditions affecting her supervisory assignment.

205. Defendant MORAN's authority over plaintiff AVILA was also coercive because he could affect her office location, tours, assignments, access to command resources, overtime opportunities, sick-leave scrutiny, transfer conditions, command reputation, and ability to supervise effectively.

206. Defendant MORAN's authority over plaintiff AVILA was also coercive because he could affect her office location, tours, assignments, access to command resources, overtime opportunities, sick-leave scrutiny, transfer conditions, command reputation, and ability to supervise effectively.

207. Plaintiff SOSA was a Police Officer assigned to the 46th Precinct and was subordinate to defendant MORAN's command authority.

208. Plaintiff SOSA was also probationary or otherwise subject to probationary review, probationary monitoring, performance documentation, UF49-related documentation, and probation-related employment decisions.

209. Defendant MORAN's authority over plaintiff SOSA was especially coercive because probationary police officers are vulnerable to command documentation, supervisory evaluations, monitoring meetings, probation extensions, and termination-related consequences.

210. Plaintiff ROMERO was a Police Officer assigned to the 46th Precinct and was subordinate to defendant MORAN's command authority.

211. Defendant MORAN's authority over plaintiff ROMERO was coercive because he could affect her assignments, tours, overtime opportunities, command reputation, disciplinary exposure, supervisory evaluations, access to command resources, and future opportunities within the Department.

212. Defendant MORAN's authority over plaintiff ROMERO was further coercive because he used his position as commanding officer to create personal access to her, obtain her phone number, pressure her to attend Department-related social events, repeatedly tell her that she "owed" him, touch her without consent, sexualize her appearance, and make resistance feel professionally risky.

213. Plaintiffs allege that defendant MORAN used his command authority to create access to them.

214. Plaintiffs allege that defendant MORAN used his command authority to pressure them into social interactions that did not feel voluntary.

215. Plaintiffs allege that defendant MORAN used his command authority to blur the line between official direction and personal access.

216. Plaintiffs allege that defendant MORAN used his command authority to sexualize them in front of other members of service.

217. Plaintiffs allege that defendant MORAN used his command authority to intimidate, punish, or retaliate when they resisted, avoided him, reported him, or failed to give him the personal attention he wanted.

218. Defendant MORAN's alleged conduct cannot be separated from his rank.

219. The harassment was more coercive because the harasser was the commanding officer.

220. The humiliation was deeper because it occurred in front of members of service who knew defendant MORAN held command power over plaintiffs.

221. The retaliation was more frightening because defendant MORAN controlled the workplace.

222. The fear of reporting was more reasonable because defendant MORAN allegedly claimed he had friends everywhere and because plaintiffs worked inside a command already associated with retaliation against complainants and those who supported them.

223. Plaintiffs allege that defendant MORAN used the 46th Precinct, his rank, and the NYPD's command structure as tools of access, pressure, sexualization, humiliation, intimidation, and control.

224. Plaintiffs further allege that defendant MORAN's abuse of command authority made the sexually hostile environment more severe, more pervasive, and more difficult to escape.

225. Plaintiffs further allege that defendant CITY and defendant TISCH are responsible for allowing defendant MORAN to exercise that authority inside a command already known to require heightened scrutiny, meaningful supervision, and protection for subordinate female members of service.

Plaintiff OSMAIRYS A. AVILA

E. Moran's Early Boundary Testing and Private Access to Plaintiff Avila

226. Plaintiff AVILA was assigned to the 46th Precinct as a Sergeant.

227. Plaintiff AVILA chose the 46th Precinct as her first-choice command when she became a supervisor.

228. Plaintiff AVILA viewed the 46th Precinct as an important step in her NYPD career.

229. Plaintiff AVILA knew, as did other members of service, that the 46th Precinct had a fraternity-like, boorish, highly sexualized, and undisciplined work atmosphere.

230. Plaintiff AVILA nevertheless believed that the change in command from SCHEUBLIN to MORAN would improve the workplace.

231. Plaintiff AVILA expected that a new commanding officer would bring discipline, professionalism, and order to a command already associated with serious allegations of sexual misconduct, supervisory boundary violations, retaliation, and institutional failure.

232. Plaintiff AVILA alleges that, instead of correcting that atmosphere, defendant MORAN began using his command authority to create private access to her, test personal boundaries, and make her feel targeted and unsafe in the workplace.

233. On or about April 14, 2026, during plaintiff AVILA's 1500 hours to 2335 hours tour, defendant MORAN caused plaintiff AVILA to enter his commanding officer's office.

234. The interaction occurred inside defendant MORAN's keypad-controlled office.

235. The office door was closed.

236. No other member of service was present.

237. The interaction lasted more than one hour, from approximately 2000 hours until approximately 2145 hours.

238. Plaintiff AVILA alleges that the closed-door setting, keypad-controlled office, late hour, absence of other members of service, and defendant MORAN's command rank made the interaction coercive and intimidating.

239. Defendant MORAN was not plaintiff AVILA's peer.

240. Defendant MORAN was not plaintiff AVILA's friend.
241. Defendant MORAN was not an ordinary supervisor.
242. Defendant MORAN was the commanding officer of the 46th Precinct.
243. Plaintiff AVILA was a subordinate Sergeant under defendant MORAN's command authority.
244. During the closed-door interaction, defendant MORAN spoke to plaintiff AVILA about his marriage, his personal life, social functions, and other personal matters.
245. Defendant MORAN also asked plaintiff AVILA questions about her personal life.
246. Plaintiff AVILA alleges that these subjects had no legitimate connection to police business, supervision, command operations, or her performance as a Sergeant.
247. Plaintiff AVILA alleges that defendant MORAN's personal comments and questions made her feel sexualized, trapped, and targeted by the commanding officer.
248. Defendant MORAN told plaintiff AVILA words to the effect of, "You're the boss."
249. Defendant MORAN told plaintiff AVILA words to the effect of, "I love feisty."
250. Defendant MORAN told plaintiff AVILA words to the effect of, "I'm good. I get to hang out whenever I want. My wife doesn't know anything."
251. Defendant MORAN also made a comment to plaintiff AVILA to the effect of, "I love a strong Latina."
252. Plaintiff AVILA alleges that these comments were inappropriate, personal, gendered, ethnicized, and boundary-crossing.
253. Plaintiff AVILA alleges that, in the context of the 46th Precinct's highly sexualized and undisciplined command atmosphere, defendant MORAN's comments

communicated personal interest, sexual availability, and ethnicized attention from the commanding officer to a subordinate female Latina Sergeant.

254. Plaintiff AVILA alleges that she understood defendant MORAN's comments as improper command-level conduct, not harmless workplace banter.

255. Plaintiff AVILA further alleges that she understood that rejecting, embarrassing, or angering the commanding officer could create professional consequences.

256. Plaintiff AVILA therefore attempted to end the interaction respectfully.

257. Plaintiff AVILA repeatedly attempted to leave by saying words to the effect of, "Okay boss, I'm going 98."

258. Defendant MORAN did not promptly end the interaction.

259. Defendant MORAN continued speaking and kept plaintiff AVILA inside his office.

260. Plaintiff AVILA alleges that defendant MORAN's conduct made her feel that she had to remain polite, restrained, and deferential in order to protect herself professionally.

261. Plaintiff AVILA alleges that defendant MORAN used the closed-office setting to test how much personal access he could obtain and how much discomfort she would tolerate.

262. Plaintiff AVILA left the interaction concerned that defendant MORAN had crossed a serious workplace boundary.

263. Plaintiff AVILA further alleges that defendant MORAN's attention was not limited to her work performance or any legitimate supervisory issue.

264. After plaintiff AVILA obtained authorized lost time and left the precinct, defendant MORAN looked for her and wanted her to return to his office.

265. The next day, defendant MORAN questioned multiple lieutenants about who authorized plaintiff AVILA's lost time and why plaintiff AVILA had requested it from Lieutenant Salinas.

266. Plaintiff AVILA had an NYPD UF28 documenting her authorized lost time.

267. Plaintiff AVILA alleges that defendant MORAN's reaction made her feel that even authorized leave could become a problem if defendant MORAN was displeased with her.

268. Plaintiff AVILA alleges that defendant MORAN's reaction made her feel monitored.

269. Plaintiff AVILA alleges that defendant MORAN's reaction made her feel that he wanted access to her whenever he chose.

270. Plaintiff AVILA alleges that defendant MORAN's reaction made her fear that leaving before he was finished with her could trigger scrutiny, anger, or retaliation.

271. On or about April 16, 2026, defendant MORAN texted plaintiff AVILA words to the effect of, "I miss you."

272. Plaintiff AVILA alleges that the message was not a legitimate work directive.

273. Plaintiff AVILA alleges that the message was not necessary to supervise her as a Sergeant.

274. Plaintiff AVILA alleges that the message was not professional command communication.

275. Plaintiff AVILA alleges that, in context, the message confirmed her concern that defendant MORAN's interest in her was personal, inappropriate, and escalating.

276. Plaintiff AVILA alleges that the message made her feel unsafe because it came from the commanding officer of a command already marked by sexualized conduct, poor discipline, and fear of retaliation.

277. Plaintiff AVILA alleges that defendant MORAN's April 14, 2026 office conduct, his reaction to her authorized lost time, and his April 16, 2026 "I miss you" message formed a pattern of access, personal attention, emotional pressure, and boundary testing.

278. Plaintiff AVILA alleges that this pattern made her increasingly fearful because the person crossing boundaries was the same person who controlled her workplace environment.

F. Moran Moves Avila Closer to His Office

279. On or about May 8, 2026, defendant MORAN caused plaintiff AVILA's office location to be changed.

280. Plaintiff AVILA's prior office was Room 219.

281. Plaintiff AVILA was moved to Room 107A.

282. Room 107A was closer to defendant MORAN's commanding officer's office.

283. Defendant MORAN personally involved himself in the move.

284. Defendant MORAN texted or otherwise contacted plaintiff AVILA about keys for the office move.

285. Plaintiff AVILA alleges that defendant MORAN's personal involvement in the office move was concerning because it followed his April 14, 2026 closed-office boundary testing and his April 16, 2026 "I miss you" text message.

286. Plaintiff AVILA alleges that she did not experience the move as an ordinary administrative reassignment of space.

287. Plaintiff AVILA alleges that defendant MORAN used his command authority to reduce her physical distance from him, increase his access to her, and make avoidance more difficult.

288. Defendant MORAN also complained that plaintiff AVILA did not like him anymore.

289. Defendant MORAN complained that plaintiff AVILA would not stop by.

290. Defendant MORAN complained that plaintiff AVILA would not get coffee.

291. Defendant MORAN complained that plaintiff AVILA did not care.

292. Defendant MORAN complained that plaintiff AVILA made him feel like she did not work in the command anymore.

293. Plaintiff AVILA alleges that these comments were not legitimate command direction.

294. Plaintiff AVILA alleges that these comments were not neutral workplace supervision.

295. Plaintiff AVILA alleges that these comments communicated that defendant MORAN believed plaintiff AVILA owed him personal attention, personal access, and emotional reassurance.

296. Plaintiff AVILA alleges that defendant MORAN's comments made her feel that he was monitoring whether she came near him, whether she engaged him, whether she gave him personal attention, and whether she maintained the level of access he wanted.

297. Plaintiff AVILA alleges that the move to Room 107A made her feel physically closer to the commanding officer who had already made her uncomfortable.

298. Plaintiff AVILA alleges that the move made her feel more visible to defendant MORAN.

299. Plaintiff AVILA alleges that the move made her feel easier for defendant MORAN to monitor.

300. Plaintiff AVILA alleges that the move made her feel less able to avoid defendant MORAN.

301. Plaintiff AVILA alleges that, inside a highly sexualized and undisciplined command, being moved closer to the commanding officer did not feel neutral or administrative.

302. Plaintiff AVILA alleges that defendant MORAN used workspace control as a tool of personal access.

303. Plaintiff AVILA alleges that defendant MORAN had the rank to move her, complain about her distance from him, and make ordinary avoidance feel professionally risky.

304. Plaintiff AVILA alleges that she could not simply tell defendant MORAN that his attention was unwanted without risking retaliation, workplace hostility, or professional consequences.

305. Plaintiff AVILA alleges that the move to Room 107A became part of the hostile work environment because it increased defendant MORAN's access to her after she attempted to create distance.

306. Plaintiff AVILA alleges that the move increased her fear, discomfort, and sense that defendant MORAN was using command power to pull her closer.

G. Moran Pressures Avila to Attend the June 17, 2026 Fishing Trip

307. On or about June 17, 2026, members of the 46th Precinct attended a fishing trip.

308. Although the fishing trip occurred away from the physical precinct building, plaintiffs allege that it was not disconnected from the workplace.

309. Plaintiffs allege that the fishing trip was a command-related Department matter involving members of service from the 46th Precinct.

310. Plaintiffs allege that the fishing trip was connected to the precinct club, command relationships, command hierarchy, and the workplace culture of the 46th Precinct.

311. Plaintiffs allege that command-related off-duty premises, precinct-club functions, NYPD affinity-organization events, and similar social gatherings operate as extensions of the workplace when ranking officers use those spaces to interact with, pressure, sexualize, evaluate, reward, or retaliate against subordinate members of service.

312. Plaintiffs allege that subordinate members of service may reasonably understand attendance, conduct, loyalty, refusal, or resistance at command-related off-duty events as affecting workplace relationships, reputation, treatment, assignments, and perceived standing inside the command.

313. Defendant MORAN used the June 17, 2026 fishing trip as a command-related setting to obtain access to plaintiff AVILA outside the precinct building.

314. Defendant MORAN pressured plaintiff AVILA to attend the fishing trip.

315. Defendant MORAN did not treat the event as purely voluntary.

316. Defendant MORAN told plaintiff AVILA words to the effect of, “That better be a yes.”

317. Defendant MORAN also texted or otherwise contacted plaintiff AVILA to confirm her attendance.

318. Plaintiff AVILA alleges that defendant MORAN's pressure was command pressure, not a casual invitation from a coworker.

319. Plaintiff AVILA alleges that she understood that declining defendant MORAN's invitation could be perceived as rejecting him personally.

320. Plaintiff AVILA alleges that she understood that rejecting defendant MORAN personally could create workplace consequences.

321. Plaintiff AVILA therefore felt pressured to attend.

322. Plaintiff AVILA told defendant MORAN she would attend because he told her to do so.

323. Defendant MORAN responded with words to the effect of, "Good job."

324. Plaintiff AVILA alleges that defendant MORAN's "Good job" response reinforced the command nature of the pressure because it communicated approval after compliance.

325. Plaintiff AVILA alleges that defendant MORAN's pressure to attend the fishing trip was especially concerning because it followed his closed-office boundary testing, his personal comments, his "I miss you" text message, his complaints that plaintiff AVILA did not stop by or get coffee, and his move of plaintiff AVILA closer to his office.

326. Plaintiff AVILA alleges that, by the time of the fishing trip, defendant MORAN had already shown that his attention toward her was personal, inappropriate, and escalating.

327. Plaintiff AVILA alleges that, by the time of the fishing trip, she already believed defendant MORAN wanted access to her beyond legitimate police supervision.

328. Plaintiff AVILA alleges that, by the time of the fishing trip, she already feared that resisting defendant MORAN's personal access could create professional risk.

329. Plaintiff AVILA alleges that the fishing trip was not a harmless recreational event because it was a command-related off-duty Department function attended by members of service and shaped by the same command hierarchy that existed inside the precinct.

330. Plaintiff AVILA attended the fishing trip under pressure from defendant MORAN.

331. Plaintiff AVILA attended while concerned about defendant MORAN's escalating conduct.

332. Plaintiff AVILA attended while aware that the same highly sexualized and undisciplined command atmosphere that made the 46th Precinct unsafe inside the building could follow members to command-related off-duty premises.

333. Plaintiff AVILA attended while understanding that defendant MORAN remained the commanding officer, that she remained subordinate, and that the same fear of retaliation, embarrassment, or professional consequence remained present.

334. Plaintiff AVILA alleges that defendant MORAN's pressure to attend the fishing trip forms part of the hostile work environment.

335. Plaintiff AVILA alleges that defendant MORAN used command authority to obtain access to her in a setting where professional boundaries could be blurred, social pressure could be intensified, alcohol could be used as an excuse, and sexualized conduct could be minimized as off-duty joking or command bonding.

336. Plaintiffs allege that defendant MORAN's use of a command-related off-duty event is independently relevant because the harassment did not stop at the precinct door.

337. Plaintiffs allege that defendant MORAN carried the sexually hostile and undisciplined command atmosphere into Department-related premises and events where subordinate female members remained subject to his rank, influence, and control.

H. Moran Sexualizes Avila During the June 17, 2026 Fishing Trip

338. During the June 17, 2026 fishing trip, defendant MORAN used the command-related off-duty setting to sexualize plaintiff AVILA in front of other members of service.

339. The fishing trip involved members of the 46th Precinct and was connected to precinct relationships, precinct hierarchy, and the 46th Precinct's workplace culture.

340. Defendant MORAN remained the commanding officer during the fishing trip.

341. Plaintiff AVILA remained a subordinate Sergeant during the fishing trip.

342. Plaintiff AVILA alleges that the command hierarchy did not disappear because the event occurred away from the physical precinct building.

343. During the fishing trip, defendant MORAN repeatedly directed, encouraged, or pressured plaintiff AVILA and Lieutenant Alejandra M. Weinold, a Latina female lieutenant, to kiss so he could take a photograph.

344. Plaintiff AVILA alleges that defendant MORAN's demand that two subordinate Latina female members kiss for his photograph was sexual, degrading, humiliating, and unrelated to any legitimate Department purpose.

345. Plaintiff AVILA alleges that defendant MORAN's conduct was especially coercive because it came from the commanding officer in front of other members of service.

346. Plaintiff AVILA alleges that defendant MORAN's conduct made her feel sexualized and humiliated in a command-related Department setting.

347. Defendant MORAN also stated words to the effect that it would be his “death wish” for plaintiff AVILA and Lieutenant Weinold to kiss.

348. Plaintiff AVILA alleges that defendant MORAN’s “death wish” comment reinforced the sexual nature of his demand.

349. Plaintiff AVILA alleges that the comment also reflected defendant MORAN’s awareness that the conduct was improper, dangerous to his career, and capable of creating serious professional consequences.

350. Sergeants Karina P. Peña and Daniel Moussanef were present during this conduct.

351. Plaintiff AVILA alleges that defendant MORAN’s conduct occurred openly, in front of other members of service, and within the same highly sexualized and undisciplined command atmosphere that had already made female members of service vulnerable inside the 46th Precinct.

352. Plaintiff AVILA alleges that being sexualized by the commanding officer in front of other members made the humiliation more severe.

353. Plaintiff AVILA alleges that defendant MORAN’s conduct made her feel that her body, dignity, and workplace standing were being turned into entertainment for the commanding officer.

354. Defendant MORAN also took multiple photographs of plaintiff AVILA during the fishing trip.

355. Defendant MORAN told plaintiff AVILA words to the effect of, “pose sexy for me.”

356. Defendant MORAN also stated words to the effect that he would take the photographs home for himself.

357. Plaintiff AVILA alleges that defendant MORAN's comments while photographing her were sexual, personal, and degrading.

358. Plaintiff AVILA alleges that defendant MORAN's conduct made her feel objectified by the commanding officer.

359. Plaintiff AVILA alleges that defendant MORAN's statement that he would take the photographs home for himself made the conduct more invasive and alarming because it suggested that he intended to use or keep images of her for his own personal gratification.

360. Officers Ahmed Y. Khalifa, David M. Peña, and Michael R. McCabe were nearby during the photograph-related conduct.

361. Plaintiff AVILA alleges that defendant MORAN's photograph-related conduct occurred in a command-related Department setting where members of service understood defendant MORAN's rank, influence, and authority over plaintiff AVILA.

362. Plaintiff AVILA alleges that the presence of other members did not make the conduct harmless.

363. Plaintiff AVILA alleges that the presence of other members made the conduct more humiliating because defendant MORAN sexualized her publicly while she remained subject to his command authority.

364. Plaintiff AVILA alleges that defendant MORAN used the fishing trip to test how far he could sexualize a subordinate female Sergeant in a command-related off-duty setting while surrounding members either watched, tolerated, laughed off, or failed to stop the conduct.

365. Plaintiff AVILA alleges that defendant MORAN's conduct during the fishing trip was part of the hostile work environment because it extended the sexually hostile atmosphere of the 46th Precinct into a Department-related off-duty event.

366. Plaintiff AVILA alleges that defendant MORAN's conduct made her feel unsafe because the commanding officer who controlled her workplace was willing to sexualize her publicly and then rely on the off-duty, alcohol-related, command-bonding setting to minimize or excuse his conduct.

367. Plaintiff AVILA later learned that Officer Luis Moquillaza reported that defendant MORAN stated during the fishing trip that he would blame everything he did that day on alcohol.

368. Plaintiff AVILA alleges that defendant MORAN's alleged statement about blaming his conduct on alcohol further demonstrates that defendant MORAN understood his conduct was improper.

369. Plaintiff AVILA alleges that defendant MORAN's alleged statement about alcohol also reflects the undisciplined command culture in which sexualized conduct by a commanding officer could be excused, minimized, or reframed as drinking-related behavior at a command event.

370. Plaintiff AVILA alleges that defendant MORAN's sexualized conduct during the fishing trip caused her embarrassment, humiliation, fear, anxiety, and loss of workplace safety.

371. Plaintiff AVILA alleges that after the fishing trip, she had greater reason to believe that defendant MORAN's inappropriate attention toward her was escalating.

372. Plaintiff AVILA alleges that after the fishing trip, she had greater reason to fear that defendant MORAN would continue using command-related spaces, social events, Department functions, and workplace authority to access, sexualize, and control her.

I. Moran's Ethnic and National-Origin Degradation of Avila During the Fishing Trip

373. During the June 17, 2026 fishing trip, defendant MORAN also made degrading comments tied to plaintiff AVILA's Dominican national origin and Latina ethnicity.

374. Defendant MORAN discussed another boat outing involving fewer people.

375. Defendant MORAN described the other boat outing in words to the effect of "less people, more intimate."

376. Defendant MORAN also referenced "water drafting."

377. Plaintiff AVILA asked defendant MORAN what he meant.

378. Defendant MORAN responded with words to the effect of, "It's not the boat you came from in DR; it's another boat."

379. Plaintiff AVILA understood "DR" to mean the Dominican Republic.

380. Plaintiff AVILA is Latina and Dominican.

381. Plaintiff AVILA alleges that defendant MORAN's comment was degrading, ethnicized, and national-origin-based.

382. Plaintiff AVILA alleges that defendant MORAN's comment invoked a stereotype or insult concerning Dominican migration, boats, poverty, foreignness, and national origin.

383. Plaintiff AVILA alleges that defendant MORAN's comment had no legitimate connection to police work, command operations, supervision, the fishing trip, or any Department purpose.

384. Plaintiff AVILA alleges that defendant MORAN's comment degraded her as a Dominican woman in front of or within the presence of other members of service.

385. Plaintiff AVILA alleges that defendant MORAN's comment compounded the sexual humiliation she experienced during the fishing trip.

386. Plaintiff AVILA alleges that defendant MORAN's conduct was not only sex-based and gender-based, but also race-, ethnicity-, and national-origin-based.

387. Plaintiff AVILA alleges that defendant MORAN's "strong Latina" comment during the April 14, 2026 closed-office interaction and his Dominican Republic boat comment during the June 17, 2026 fishing trip were part of the same pattern of ethnicized and sexualized attention toward her.

388. Plaintiff AVILA alleges that defendant MORAN's comments treated her Latina and Dominican identity as something to sexualize, mock, or use against her.

389. Plaintiff AVILA alleges that defendant MORAN's Dominican Republic boat comment made her feel demeaned, singled out, and unsafe as a Latina and Dominican subordinate member of service.

390. Plaintiff AVILA alleges that the comment was especially harmful because it came from the commanding officer of the precinct.

391. Plaintiff AVILA alleges that the comment was especially coercive because defendant MORAN controlled her workplace and had already shown he was willing to use rank, access, social pressure, and humiliation against her.

392. Plaintiff AVILA alleges that defendant MORAN's ethnic and national-origin degradation forms part of the hostile work environment under the NYSHRL and NYCHRL.

393. Plaintiff AVILA further alleges that defendant MORAN's ethnic and national-origin degradation supports her claims of race, ethnicity, and national-origin discrimination under the NYSHRL and NYCHRL.

J. Moran's Immediate Retaliation Against Avila After the Fishing Trip

394. On or about June 18, 2026, the day after the fishing trip, plaintiff AVILA was assigned to a CTO detail in Manhattan.

395. Plaintiff AVILA needed transportation for the CTO detail.

396. At that time, Q Team vehicles were available.

397. Available RMPs included RMP 3289, RMP 4963, and RMP 3775.

398. Desk Sergeant De La Rosa informed plaintiff AVILA that defendant MORAN directed that plaintiff AVILA not be permitted to take an RMP.

399. Plaintiff AVILA alleges that the denial of an available RMP was not a neutral operational decision.

400. Plaintiff AVILA alleges that the denial occurred immediately after the fishing trip, where defendant MORAN had sexualized, humiliated, photographed, and ethnically degraded her.

401. Plaintiff AVILA alleges that the timing made the denial retaliatory and intimidating.

402. Defendant MORAN told plaintiff AVILA words to the effect of, “It’s called the train, Avila.”

403. Plaintiff AVILA alleges that defendant MORAN’s comment was dismissive, humiliating, and punitive.

404. Plaintiff AVILA alleges that defendant MORAN’s comment communicated that he could make her work more difficult when displeased with her.

405. Plaintiff AVILA alleges that defendant MORAN’s denial of an RMP made her feel punished for failing to give him the personal attention, compliance, or submissive response he wanted.

406. Plaintiff AVILA alleges that defendant MORAN's conduct made her feel that ordinary command resources could be withheld from her if she resisted, avoided, or displeased him.

407. Plaintiff AVILA alleges that the RMP denial was part of the hostile work environment because it used workplace resources and command authority to punish and intimidate her.

408. Plaintiff AVILA further alleges that the RMP denial was part of defendant MORAN's escalating retaliation and control.

409. On or about June 18, 2026, plaintiff AVILA was later inside a vehicle with Sergeant Steve Ortiz (Bronx North) driving and Lieutenant Franklin C. Salinas seated in the front passenger seat.

410. Plaintiff AVILA was seated in the rear of the vehicle.

411. Defendant MORAN FaceTimed Sergeant Ortiz.

412. During the FaceTime call, defendant MORAN directed Sergeant Ortiz to put plaintiff AVILA on the phone.

413. Plaintiff AVILA alleges that defendant MORAN's FaceTime demand was not a legitimate command necessity.

414. Plaintiff AVILA alleges that defendant MORAN used Sergeant Ortiz's phone and another workplace setting to create access to her after she was already attempting to avoid him.

415. Plaintiff AVILA exited the vehicle to avoid interacting with defendant MORAN on FaceTime.

416. Plaintiff AVILA cried after exiting the vehicle.

417. Plaintiff AVILA alleges that defendant MORAN's FaceTime demand made her feel pursued, monitored, and unable to avoid him even when she was away from his physical office.

418. Plaintiff AVILA alleges that defendant MORAN's conduct made her feel unsafe because he could use other supervisors, phones, vehicles, office moves, Department events, and command resources to reach her.

419. Plaintiff AVILA alleges that defendant MORAN's conduct caused her emotional distress, anxiety, humiliation, and fear of further retaliation.

420. Plaintiff AVILA alleges that, by June 18, 2026, defendant MORAN's conduct had escalated from closed-office boundary testing, personal comments, and inappropriate text messages to public sexualization, ethnic degradation, resource denial, and efforts to reach her through other members of service.

421. Plaintiff AVILA alleges that defendant MORAN's June 18, 2026 conduct confirmed that the harassment and retaliation did not stop when the fishing trip ended.

422. Plaintiff AVILA alleges that defendant MORAN carried the hostile environment back into the workplace and used command authority to make her working conditions more difficult, more fearful, and less safe.

K. Other Members Report Similar Moran Conduct to Avila

423. After the June 17, 2026 fishing trip, plaintiff AVILA learned that defendant MORAN's inappropriate conduct was not limited to her.

424. Plaintiff AVILA alleges that other members of service began disclosing similar or related concerns about defendant MORAN's conduct, pressure, sexual comments, inappropriate attention, retaliation, and abuse of rank.

425. Plaintiff AVILA alleges that these disclosures confirmed her belief that defendant MORAN was engaging in a broader pattern of misconduct inside and around the 46th Precinct.

426. On or about June 20, 2026, at approximately 0400 hours, Police Officer Steven Disla approached plaintiff AVILA.

427. Officer Disla disclosed concerns regarding defendant MORAN's conduct toward him.

428. Officer Disla reported that defendant MORAN had pressured him to attend the June 17, 2026 fishing trip.

429. Officer Disla reported that defendant MORAN wanted to say certain things during the fishing trip and later blame the conduct on alcohol.

430. Officer Disla further reported that defendant MORAN told him words to the effect of, "I was the one that put you on NST."

431. Officer Disla further reported that defendant MORAN told him words to the effect of, "You know Downtown hates you, right?"

432. Plaintiff AVILA alleges that defendant MORAN's statements to Officer Disla reflected command manipulation, intimidation, and the use of assignment-related authority to control a subordinate member of service.

433. Plaintiff AVILA alleges that Officer Disla appeared emotionally affected by defendant MORAN's conduct.

434. Officer Disla reported that defendant MORAN's conduct made him feel "like a bitch" and "less of a man."

435. Plaintiff AVILA alleges that Officer Disla's disclosure was significant because it showed that defendant MORAN's abuse of rank was not limited to female members of service.

436. Plaintiff AVILA alleges that defendant MORAN's conduct toward Officer Disla reflected a broader command pattern of humiliation, intimidation, coercion, and control.

437. Plaintiff AVILA further alleges that audio recordings exist concerning Officer Disla's disclosures and/or defendant MORAN's conduct.

438. Plaintiff AVILA alleges that Officer Disla's disclosure intensified her fear because it confirmed that defendant MORAN was willing to use his rank, assignments, and "Downtown" connections to pressure subordinate members.

439. Plaintiff AVILA alleges that Officer Disla's disclosure made her reasonably believe that defendant MORAN had influence beyond the 46th Precinct and could affect a member's assignments, reputation, and treatment within the NYPD.

440. Plaintiff AVILA also received information concerning defendant MORAN's conduct toward Police Officer Brittany Romero.

441. On or about June 26, 2026, in connection with the New York Dominican Officers Organization ("NYDO") Tipico party, Officer Romero contacted plaintiff AVILA regarding defendant MORAN's conduct.

442. The NYDO Tipico party was an NYPD-related off-duty event connected to Department members, affinity-organization relationships, command hierarchy, and workplace culture.

443. Plaintiff AVILA alleges that, although the NYDO Tipico party occurred away from the physical precinct building, it remained connected to the workplace when defendant MORAN used that setting to interact with, pressure, sexualize, evaluate, or intimidate subordinate members of service.

444. Officer Romero sent plaintiff AVILA a photograph of herself with defendant MORAN.

445. Officer Romero reported that defendant MORAN made her take the photograph.

446. Officer Romero reported that defendant MORAN asked why plaintiff AVILA was not present.

447. Plaintiff AVILA alleges that defendant MORAN's request about plaintiff AVILA's absence showed that he continued monitoring her attendance at command-related or Department-related social events.

448. Plaintiff AVILA alleges that defendant MORAN's conduct made her feel that avoiding him at off-duty Department-related events could itself become an issue.

449. Officer Romero also reported that defendant MORAN commented that her dress was unauthorized and that he had to "look into it."

450. Plaintiff AVILA alleges that defendant MORAN's comment about Officer Romero's dress reflected the same pattern of sexualized scrutiny, appearance-based attention, and rank-based intimidation directed toward subordinate female members.

451. Plaintiff AVILA alleges that defendant MORAN's conduct toward Officer Romero was concerning because he allegedly mixed sexualized or appearance-related attention with the threat or suggestion of command scrutiny.

452. Plaintiff AVILA also learned that defendant MORAN referred to Police Officer Kimberly Lugo as "his favorite."

453. Plaintiff AVILA alleges that defendant MORAN's "favorite" comment reflected inappropriate personal favoritism toward subordinate female members of service.

454. Plaintiff AVILA alleges that, in the context of the 46th Precinct's highly sexualized and undisciplined atmosphere, defendant MORAN's "favorite" comment was not harmless because it suggested that female subordinates could be singled out, sexualized, favored, or targeted based on defendant MORAN's personal interest.

455. Plaintiff AVILA was also informed that plaintiff SOSA disclosed that defendant MORAN untied the knot securing her dress at the NYDO Tipico party.

456. Plaintiff AVILA was informed that defendant MORAN's conduct nearly caused plaintiff SOSA to be exposed.

457. Plaintiff AVILA was further informed that defendant MORAN told plaintiff SOSA words to the effect of, "You are going to be the reason for my divorce and the reason I lose my pension."

458. Plaintiff AVILA alleges that this statement was sexually charged, coercive, and retaliatory in meaning because defendant MORAN allegedly blamed a subordinate female officer for the consequences of his own misconduct.

459. Plaintiff AVILA alleges that defendant MORAN's statement suggested that subordinate female members would be treated as the cause of his professional or marital problems if his conduct became known.

460. Plaintiff AVILA also learned that defendant MORAN allegedly made a similar pension-related comment to Officer Lugo.

461. Plaintiff AVILA alleges that these disclosures showed a recurring pattern: defendant MORAN allegedly sexualized subordinate members, pursued personal access at command-related events, commented on their appearance, invoked his marriage or pension,

blamed female members for his own misconduct, and used rank to make the interactions coercive.

462. Plaintiff AVILA alleges that these disclosures reinforced that the 46th Precinct's hostile environment was not limited to one interaction, one woman, one event, or one location.

463. Plaintiff AVILA alleges that these disclosures made her feel less safe because they confirmed that defendant MORAN's conduct was broader, repeated, and known to multiple members of service.

464. Plaintiff AVILA alleges that the disclosures also made reporting more frightening because they showed that defendant MORAN's conduct operated through command relationships, off-duty Department-related events, subordinate fear, and workplace silence.

465. Plaintiff AVILA alleges that defendant MORAN's conduct toward other members is relevant to pattern, motive, notice, hostile work environment, discrimination, retaliation, and the City's failure to prevent and correct misconduct.

L. Avila Reports Moran to IAB and OEI

466. On or about June 20, 2026, at approximately 1945 hours, plaintiff AVILA went to the Internal Affairs Bureau located at 315 Hudson Street, New York, New York.

467. Plaintiff AVILA went to IAB to report defendant MORAN's conduct.

468. Plaintiff AVILA was crying and emotionally devastated when she reported defendant MORAN.

469. Plaintiff AVILA reported that defendant MORAN, the commanding officer of the 46th Precinct, had engaged in inappropriate, sexualized, coercive, retaliatory, and abusive conduct.

470. Plaintiff AVILA alleges that reporting defendant MORAN was frightening because he was the commanding officer of her precinct, claimed to have friends everywhere, and worked inside a Department culture where complaints against ranking officers could create professional danger.

471. Plaintiff AVILA alleges that she went to IAB because she needed protection from defendant MORAN and because the ordinary command structure could not protect her from the commanding officer himself.

472. Plaintiff AVILA alleges that IAB personnel told her that she should speak with an executive.

473. Plaintiff AVILA was not permitted to speak with an executive at that time.

474. Plaintiff AVILA was told that someone would contact her.

475. No one contacted plaintiff AVILA.

476. Plaintiff AVILA alleges that the failure to contact her made her feel abandoned by the very Department mechanism that was supposed to protect her.

477. Plaintiff AVILA alleges that the failure to act also made her fear that her complaint had been minimized, ignored, or mishandled because the accused was a commanding officer.

478. On or about June 29, 2026, plaintiff AVILA followed up with IAB regarding her report.

479. Plaintiff AVILA was informed that IAB could not locate her case.

480. Plaintiff AVILA alleges that learning IAB could not locate her case was alarming, humiliating, and frightening.

481. Plaintiff AVILA alleges that it made her believe that her complaint against defendant MORAN had disappeared inside the Department.

482. Plaintiff AVILA alleges that the disappearance or inability to locate her complaint reinforced her fear that the NYPD's internal systems protected ranking officers instead of subordinate female complainants.

483. Plaintiff AVILA was later informed that the matter had been forwarded to OEI.

484. Plaintiff AVILA then contacted OEI.

485. EEO informed plaintiff AVILA that it had no case.

486. Plaintiff AVILA alleges that being told by IAB that the matter was sent to OEI, and then being told by OEI that there was no case, made her feel trapped in an institutional shell game.

487. Plaintiff AVILA alleges that the NYPD's handling of her report caused her to feel that no internal unit was accepting responsibility for protecting her.

488. Plaintiff AVILA alleges that the mishandling of her complaint intensified her fear of defendant MORAN because she remained exposed to his command authority while her complaint appeared to be lost, ignored, or bounced between units.

489. On or about June 30, 2026, plaintiff AVILA returned to IAB.

490. Plaintiff AVILA returned despite suffering from an eye infection.

491. Plaintiff AVILA asked to speak with an executive.

492. Plaintiff AVILA was again denied access to an executive.

493. Plaintiff AVILA was interviewed while crying.

494. Plaintiff AVILA alleges that she was forced to recount humiliating, sexualized, and retaliatory conduct while visibly distressed and while still unsure whether the Department would protect her.

495. Plaintiff AVILA was then sent to OEI.

496. At OEI, plaintiff AVILA waited to be interviewed.

497. Sergeant Meetpal Singh and Detective Third Grade Stephanie Perez interviewed plaintiff AVILA.

498. During the OEI process, Sergeant Singh began by stating words to the effect of, “If you lie to us, there will be a problem.”

499. Plaintiff AVILA alleges that this statement was threatening, accusatory, and inappropriate under the circumstances.

500. Plaintiff AVILA alleges that she came to OEI as a complainant seeking protection from sexual harassment, retaliation, and abuse by a commanding officer.

501. Plaintiff AVILA alleges that she was treated as though she were the problem.

502. Plaintiff AVILA alleges that beginning the interview with a threat about lying chilled, intimidated, and further traumatized her.

503. Plaintiff AVILA alleges that the statement made her feel that the Department was more interested in warning her than protecting her.

504. Plaintiff AVILA alleges that the IAB and OEI response reflected the same institutional failure that made the 46th Precinct dangerous for female members of service.

505. Plaintiff AVILA alleges that the NYPD’s handling of her report failed to provide prompt, effective, credible, and retaliation-free protection.

506. Plaintiff AVILA alleges that she engaged in protected activity when she reported defendant MORAN's conduct to IAB and OEI.

507. Plaintiff AVILA alleges that defendants knew or should have known that she had engaged in protected activity.

508. Plaintiff AVILA alleges that, after her protected activity, she was subjected to retaliatory scrutiny, intimidation, threats, transfer pressure, and further hostile treatment.

M. Retaliation Against Avila After Her Protected Complaints

509. On or about July 1, 2026, after plaintiff AVILA reported defendant MORAN to IAB and OEI, Absence Control, Sergeant Derby Wancique appeared at plaintiff AVILA's residence.

510. Plaintiff AVILA was on regular sick leave due to an eye infection.

511. Plaintiff AVILA had a medical appointment with a healthcare professional located in the Bronx.

512. Plaintiff AVILA was not chronic sick.

513. Plaintiff AVILA had no history of sick-leave abuse.

514. Plaintiff AVILA had not previously been subjected to Absence Control visits under similar circumstances.

515. Plaintiff AVILA alleges that the Absence Control visit was not a neutral administrative act.

516. Plaintiff AVILA alleges that the Absence Control visit occurred immediately after her protected complaints against defendant MORAN.

517. Plaintiff AVILA alleges that the timing made the Absence Control visit retaliatory, intimidating, and punitive.

518. Plaintiff AVILA alleges that the Absence Control visit made her feel that defendant MORAN's reach extended beyond the precinct and into her home.

519. Plaintiff AVILA alleges that the Absence Control visit made her feel that reporting defendant MORAN had made her a target.

520. Plaintiff AVILA alleges that the Absence Control visit intensified her fear that Department machinery could be used against her for seeking protection.

521. On or about July 2, 2026, a meeting occurred inside the commanding officer's office at the 46th Precinct.

522. The meeting occurred between approximately 1500 hours and 1530 hours.

523. Plaintiff AVILA was out sick and was not present.

524. Members present included Lieutenant Brian J. VanDuzer, Lieutenant Salinas, Sergeant Terrence Blumenberg, Sergeant Lee P. Arroyo, and other supervisors.

525. During that meeting, defendant MORAN allegedly discussed members calling IAB and OEI on him.

526. Defendant MORAN stated words to the effect of, "You want to go on vacation and then scam sick, yeah I'm going to call on you."

527. Plaintiff AVILA alleges that this statement directly related to sick-leave scrutiny and reinforced the retaliatory nature of the July 1, 2026 Absence Control visit.

528. Defendant MORAN stated words to the effect of, "People are dropping logs on me."

529. Defendant MORAN stated words to the effect of, "You want to call IAB and EEO on me? I have friends everywhere. You're going to pay."

530. Defendant MORAN stated words to the effect of, “If they thought I was bad, I can be worse.”

531. Defendant MORAN stated words to the effect of, “You’re coming after my family.”

532. Defendant MORAN stated words to the effect of, “Now I have two EEOs on me.”

533. Plaintiff AVILA alleges that defendant MORAN’s statements were retaliatory threats.

534. Plaintiff AVILA alleges that defendant MORAN’s statements were directed at members who reported or were believed to have reported him to IAB and OEI.

535. Plaintiff AVILA alleges that defendant MORAN’s statements communicated that protected complaints would be punished.

536. Plaintiff AVILA alleges that defendant MORAN’s statement that he had “friends everywhere” was especially intimidating because defendant MORAN had previously presented himself as connected to people throughout the Department.

537. Plaintiff AVILA alleges that defendant MORAN’s statement “You’re going to pay” was a direct threat of retaliation.

538. Plaintiff AVILA alleges that defendant MORAN’s statement “If they thought I was bad, I can be worse” communicated that he would escalate his mistreatment after being reported.

539. Plaintiff AVILA alleges that defendant MORAN’s statements made her fear additional retaliation, career damage, transfer consequences, discipline, and workplace hostility.

540. Plaintiff AVILA alleges that defendant MORAN's statements also demonstrated consciousness of wrongdoing because he acknowledged that members had gone to IAB and OEI and then threatened consequences.

541. On or about July 2, 2026, plaintiff AVILA contacted OEI regarding defendant MORAN's conduct and retaliation.

542. Plaintiff AVILA spoke with Sergeant Francis J. Bott.

543. Sergeant Bott stated words to the effect of, "He can't retaliate, we are working on your transfer."

544. Plaintiff AVILA alleges that the Department's response was not to immediately remove defendant MORAN from command authority over her.

545. Plaintiff AVILA alleges that the Department's response was instead to work on transferring plaintiff AVILA out of the command she had chosen and where she had wanted to build her career.

546. Plaintiff AVILA alleges that the proposed transfer functioned as both protection and punishment.

547. Plaintiff AVILA alleges that she did not want to leave the 46th Precinct.

548. On or about July 6, 2026, plaintiff AVILA was transferred from the 46th Precinct to the 47th Precinct.

549. Plaintiff AVILA alleges that she was forced to seek or accept transfer relief because the Department failed to protect her from defendant MORAN inside the command.

550. Plaintiff AVILA alleges that being pushed out of her chosen command made her feel punished for reporting sexual harassment and retaliation.

551. Plaintiff AVILA alleges that defendant MORAN's retaliation and the Department's failure to protect her caused her to lose the professional stability, command placement, career optimism, and workplace safety she had expected when she selected the 46th Precinct.

552. Plaintiff AVILA alleges that defendant MORAN's conduct caused her severe emotional distress, humiliation, anxiety, fear, anger, sadness, and loss of dignity.

553. Plaintiff AVILA alleges that she feared defendant MORAN could damage her career because he was the commanding officer, claimed to have friends everywhere, and had already used command resources, supervisors, sick-leave scrutiny, and workplace threats against her.

554. Plaintiff AVILA alleges that she became afraid in and around the workplace.

555. Plaintiff AVILA alleges that she felt watched, monitored, controlled, and professionally unsafe.

556. Plaintiff AVILA alleges that she carried her firearm home because she feared for her safety.

557. Plaintiff AVILA alleges that defendant MORAN's retaliation confirmed that her fears about reporting were reasonable.

558. Plaintiff AVILA alleges that the City, NYPD, and TISCH failed to provide prompt and effective remedial action after she reported defendant MORAN.

559. Plaintiff AVILA alleges that the City, NYPD, and TISCH ratified defendant MORAN's retaliation by failing to immediately protect her from his command authority and by permitting the burden of the misconduct to fall on her.

560. Plaintiff AVILA alleges that the retaliation after her protected complaints forms part of the hostile work environment, retaliation, discrimination, aiding-and-abetting, and employer-liability claims under the NYSHRL and NYCHRL.

Plaintiff PAMELA SOSA

N. Moran's Early Boundary Testing and Private Access to Plaintiff Sosa

561. Plaintiff SOSA is a female Latina and Dominican Police Officer assigned to the 46th Precinct.

562. Plaintiff SOSA was subordinate to defendant MORAN's command authority.

563. Plaintiff SOSA was also probationary or otherwise subject to probationary review, probationary monitoring, performance documentation, Form 49-related documentation, and probation-related employment decisions.

564. Plaintiff SOSA alleges that defendant MORAN's rank, her probationary status, and the 46th Precinct's highly sexualized and undisciplined command atmosphere made his conduct toward her coercive and intimidating.

565. On or about June 1, 2026, plaintiff SOSA worked 1500 hours to 2335 hours tour.

566. During that tour, plaintiff SOSA was assigned to patrol.

567. At approximately 2225 hours, plaintiff SOSA returned to the 46th Precinct to complete a Complaint Report, also known as a "61," concerning a Grand Larceny Auto.

568. Plaintiff SOSA was inside the 124-room completing the Complaint Report.

569. Defendant MORAN observed plaintiff SOSA in the complaint room.

570. Defendant MORAN asked plaintiff SOSA what she was doing.

571. Plaintiff SOSA informed defendant MORAN that she was completing a Complaint Report concerning a Grand Larceny Auto.

572. Defendant MORAN told plaintiff SOSA that when she was done, she should come into his office because he had to speak with her about something.

573. Plaintiff SOSA alleges that defendant MORAN's directive was not a casual invitation.

574. Plaintiff SOSA alleges that, as a probationary Police Officer, she understood a directive from the commanding officer to report to his office as a command instruction carrying potential professional consequences.

575. After completing the Complaint Report, plaintiff SOSA knocked on defendant MORAN's office door.

576. Defendant MORAN gestured for plaintiff SOSA to enter the code to his office.

577. Plaintiff SOSA did not know the code.

578. Plaintiff SOSA stated that she did not know the code because she had never been inside defendant MORAN's office.

579. Defendant MORAN opened the door and asked plaintiff SOSA words to the effect of, "You don't know the code to my office?"

580. Plaintiff SOSA replied that she did not know the code and had never been inside his office.

581. Plaintiff SOSA alleges that defendant MORAN's comment about the code was inappropriate because it suggested that a subordinate probationary female Police Officer should already have familiarity with private access to the commanding officer's office.

582. Plaintiff SOSA entered defendant MORAN's office.

583. Defendant MORAN asked plaintiff SOSA to "tell him about myself" or words to that effect.

584. Plaintiff SOSA asked whether defendant MORAN was asking about her work ethic or her personal life.

585. Defendant MORAN referred to plaintiff SOSA as a “hot head.”

586. Defendant MORAN offered plaintiff SOSA bottled water.

587. Plaintiff SOSA already had water and declined.

588. Defendant MORAN again asked plaintiff SOSA to tell him about herself or words to that effect.

589. Defendant MORAN asked plaintiff SOSA whether she was part of the Hispanic Society community.

590. Plaintiff SOSA stated that she was not a member but had attended events.

591. Plaintiff SOSA is Latina and Dominican.

592. Plaintiff SOSA alleges that defendant MORAN’s questioning about Hispanic Society events, in the context of his broader conduct toward Latina and Dominican subordinate women, was not neutral or harmless.

593. Plaintiff SOSA alleges that defendant MORAN’s questioning connected her ethnic identity, Department-affinity spaces, and his desire to access her at social or off-duty Department-related events.

594. Plaintiff SOSA attempted to redirect the conversation to her Field Training Unit experience and her supervisors.

595. Defendant MORAN interrupted plaintiff SOSA and stated words to the effect of, “I’m asking because I have to write a 49 about you.”

596. Plaintiff SOSA asked defendant MORAN, “A 49 about what specifically?” or words to that effect.

597. Defendant MORAN did not answer plaintiff SOSA's question.

598. Defendant MORAN did not explain the basis for the alleged UF49.

599. Defendant MORAN did not identify any performance deficiency, misconduct, command issue, or legitimate supervisory basis for the alleged UF49.

600. Plaintiff SOSA alleges that defendant MORAN's unexplained UF49 statement was coercive and intimidating.

601. Plaintiff SOSA alleges that defendant MORAN introduced the threat or possibility of adverse documentation while questioning her about personal matters, ethnic-affinity events, and her willingness to attend social events.

602. Plaintiff SOSA alleges that, as a probationary Police Officer, an unexplained UF49 reference from the commanding officer carried serious professional meaning.

603. Plaintiff SOSA alleges that defendant MORAN's refusal to explain the alleged UF49 made the interaction more intimidating because it left her uncertain whether her probationary status, evaluations, or future employment were at risk.

604. Defendant MORAN ended the interaction by telling plaintiff SOSA words to the effect of, "You better come to the events and bring your girlfriends."

605. Plaintiff SOSA laughed uncomfortably and left the office.

606. Plaintiff SOSA alleges that defendant MORAN's statement about events and "girlfriends" was inappropriate, gendered, and coercive.

607. Plaintiff SOSA alleges that defendant MORAN's statement communicated that he expected her to attend command-related or Department-related social events and bring other women with her.

608. Plaintiff SOSA alleges that the statement had no legitimate connection to the Complaint Report she had been completing, her patrol duties, or any proper performance issue.

609. Plaintiff SOSA alleges that defendant MORAN's office interaction made her feel uncomfortable, targeted, and professionally vulnerable.

610. Plaintiff SOSA alleges that defendant MORAN used his office, rank, and her probationary status to blur the line between command supervision, personal access, ethnic-affinity spaces, and social-event pressure.

611. Plaintiff SOSA alleges that the June 1, 2026 office interaction was the beginning of defendant MORAN's boundary testing toward her.

612. Plaintiff SOSA alleges that the interaction made her concerned that defendant MORAN's attention toward her was not limited to legitimate police supervision.

O. Moran Sexualizes Sosa During the June 17, 2026 Fishing Trip

613. On or about June 17, 2026, plaintiff SOSA attended the 46th Precinct fishing trip.

614. As alleged above, the fishing trip was a command-related off-duty Department matter involving 46th Precinct members, command relationships, command hierarchy, precinct-club relationships, and the workplace culture of the 46th Precinct.

615. Defendant MORAN remained the commanding officer during the fishing trip.

616. Plaintiff SOSA remained a subordinate Police Officer during the fishing trip.

617. Plaintiff SOSA alleges that her probationary status and defendant MORAN's rank made his conduct during the fishing trip coercive and intimidating.

618. During the fishing trip, defendant MORAN commented on the short's plaintiff SOSA was wearing.

619. Defendant MORAN stated that plaintiff SOSA should not wear those shorts for running because they were too short.

620. Plaintiff SOSA was not the only woman wearing shorts at the event.

621. Defendant MORAN nevertheless singled out plaintiff SOSA.

622. Plaintiff SOSA alleges that defendant MORAN's comment was inappropriate, sexualized, and appearance-based.

623. Plaintiff SOSA alleges that defendant MORAN's comment made her feel that the commanding officer was scrutinizing her body and clothing.

624. Plaintiff SOSA alleges that defendant MORAN's comment was especially humiliating because it occurred in a command-related Department setting involving other members of service.

625. Defendant MORAN also stated words to the effect that plaintiff SOSA was "going to be the reason" he got a log dropped on him.

626. Defendant MORAN also stated words to the effect that plaintiff SOSA was "going to get him in trouble."

627. Plaintiff SOSA alleges that these statements were sexually charged and blame-shifting.

628. Plaintiff SOSA alleges that defendant MORAN's statements suggested that his sexualized attention to her body could become her fault.

629. Plaintiff SOSA alleges that defendant MORAN's statements placed responsibility on her, a subordinate probationary female Police Officer, for the professional consequences of his own inappropriate conduct.

630. Plaintiff SOSA alleges that defendant MORAN's conduct made her feel uncomfortable, sexualized, and unsafe.

631. Plaintiff SOSA alleges that defendant MORAN's conduct was not harmless joking because it occurred after his June 1, 2026 closed-office interaction, his unexplained Form 49 reference, and his statement that she should attend events and bring her girlfriends.

632. Plaintiff SOSA alleges that defendant MORAN's fishing-trip conduct confirmed that his interest in her was personal, inappropriate, and escalating.

633. Plaintiff SOSA alleges that defendant MORAN used the fishing trip as a command-related off-duty setting to sexualize her body, test boundaries, and place blame on her for the risk created by his own conduct.

634. Plaintiff SOSA alleges that the conduct formed part of the hostile work environment because the same command hierarchy, rank pressure, and fear of workplace consequence existed at the fishing trip.

635. Plaintiff SOSA alleges that defendant MORAN's conduct during the fishing trip also connected to the broader pattern of defendant MORAN sexualizing Latina and Dominican subordinate women in command-related spaces.

636. Plaintiff SOSA alleges that defendant MORAN's conduct caused embarrassment, humiliation, anxiety, and increased fear regarding her probationary status and workplace treatment.

P. Moran's Conduct Toward Sosa at the New York Dominican Officers Organization ("NYDO") Tipico Party

637. On or about June 27, 2026, plaintiff SOSA attended the New York Dominican Officers Organization ("NYDO") Tipico party.

638. Plaintiff SOSA attended the NYDO Tipico party with female coworkers.

639. Plaintiff SOSA arrived at approximately 2150 hours.

640. The NYDO Tipico party was an off-duty Department-related event involving NYPD members, Department relationships, affinity-organization relationships, command social networks, and workplace culture.

641. Plaintiff SOSA is Latina and Dominican.

642. Plaintiff SOSA alleges that the NYDO Tipico party was directly connected to her ethnic and national-origin identity as a Dominican member of service.

643. Plaintiff SOSA alleges that the NYDO Tipico party also remained connected to the workplace when defendant MORAN, the commanding officer of the 46th Precinct, used that setting to interact with, pressure, sexualize, evaluate, or intimidate subordinate members of service.

644. Plaintiff SOSA and her female coworkers sat on a couch.

645. Defendant MORAN approached the table or seating area.

646. Defendant MORAN greeted two female officers.

647. Plaintiff SOSA waved.

648. Defendant MORAN stated words to the effect of, “You don’t know how to say hello?”

649. Defendant MORAN then leaned in and gave plaintiff SOSA a tight hug.

650. Plaintiff SOSA alleges that the hug was unwanted, uncomfortable, and coercive.

651. Plaintiff SOSA alleges that the hug was coercive because defendant MORAN was the commanding officer, she was a subordinate probationary Police Officer, and the interaction occurred at a department-related event where workplace relationships and command standing remained present.

652. Defendant MORAN went to the bar.
653. Defendant MORAN returned with tequila.
654. Defendant MORAN offered drinks to plaintiff SOSA's table.
655. Defendant MORAN repeatedly asked plaintiff SOSA and other female members to dance.
656. Whenever bachata played, defendant MORAN told plaintiff SOSA that she "owed him a dance" or words to that effect.
657. Defendant MORAN made this demand more than once.
658. Plaintiff SOSA eventually agreed to dance to stop defendant MORAN from continuing to ask.
659. Plaintiff SOSA alleges that defendant MORAN's repeated dance demands were not voluntary social interaction.
660. Plaintiff SOSA alleges that defendant MORAN used the NYDO Tipico party, alcohol, music, command rank, and social pressure to obtain physical and personal access to her.
661. Plaintiff SOSA alleges that defendant MORAN's repeated statement that she "owed him" a dance communicated entitlement to her time, body, and compliance.
662. Plaintiff SOSA alleges that defendant MORAN's conduct was especially coercive because it followed his June 1, 2026 office interaction, his unexplained Form 49 reference, his instruction that she attend events and bring her girlfriends, and his June 17, 2026 comments about her shorts.
663. Plaintiff SOSA also observed defendant MORAN making comments to other female officers that made them uncomfortable.

664. Plaintiff SOSA observed defendant MORAN mixing comments about work performance with comments or discussions concerning personal sexual interests.

665. Plaintiff SOSA observed defendant MORAN commenting on phone lock screens, including lock screens showing significant others.

666. Plaintiff SOSA alleges that defendant MORAN's conduct at the NYDO Tipico party reflected the same highly sexualized and undisciplined command atmosphere present inside the 46th Precinct.

667. Plaintiff SOSA alleges that defendant MORAN's conduct at the NYDO Tipico party made subordinate female members feel scrutinized, pressured, and unsafe in a department-related setting.

668. Plaintiff SOSA alleges that defendant MORAN's conduct was not disconnected from the workplace because defendant MORAN remained the commanding officer, plaintiff SOSA remained subordinate, and his conduct affected her fear, comfort, dignity, and workplace standing.

669. Plaintiff SOSA alleges that defendant MORAN's conduct at the NYDO Tipico party formed part of the hostile work environment, discrimination, and retaliation context under the NYSHRL and NYCHRL.

Q. Moran Unties Sosa's Dress in Front of Department Members

670. During the NYDO Tipico party, plaintiff SOSA was seated on a couch.

671. The knot behind plaintiff SOSA's neck securing her dress became loose.

672. Plaintiff SOSA asked a female coworker to retie the knot.

673. Plaintiff SOSA leaned forward so the female coworker could retie the knot securing her dress.

674. While plaintiff SOSA was leaning forward, defendant MORAN approached from behind the couch.

675. Defendant MORAN intentionally untied the knot securing plaintiff SOSA's dress.

676. Defendant MORAN touched the back of plaintiff SOSA's neck while doing so.

677. Plaintiff SOSA immediately grabbed the front of her dress to cover her breasts and prevent exposure.

678. Plaintiff SOSA alleges that defendant MORAN's conduct was sexual, invasive, humiliating, and physically boundary-crossing.

679. Plaintiff SOSA alleges that defendant MORAN's conduct nearly exposed her breasts in front of coworkers and Department members.

680. Plaintiff SOSA alleges that defendant MORAN's conduct made her feel shocked, embarrassed, violated, and unsafe.

681. Plaintiff SOSA alleges that defendant MORAN's conduct was especially humiliating because it occurred publicly in a department-related setting.

682. Plaintiff SOSA alleges that defendant MORAN's conduct was especially coercive because he was the commanding officer and she was a subordinate probationary Police Officer.

683. Three female coworkers told plaintiff SOSA that they witnessed defendant MORAN intentionally untie the knot securing her dress.

684. Plaintiff SOSA alleges that the presence of witnesses confirmed that defendant MORAN's conduct was observable, intentional, and not accidental.

685. Plaintiff SOSA alleges that defendant MORAN's conduct was part of the same pattern of sexualized access, alcohol-fueled command misconduct, and boundary violations that had occurred at the fishing trip and inside the 46th Precinct.

686. Plaintiff SOSA alleges that defendant MORAN's conduct transformed the NYDO Tipico party into another site of workplace humiliation and sexual harassment.

687. Plaintiff SOSA alleges that defendant MORAN's act of untying her dress caused her to fear that the commanding officer could use any Department-related setting to touch, expose, sexualize, or humiliate her.

688. Plaintiff SOSA alleges that defendant MORAN's driver pulled him aside multiple times during the event with calming, moderating, or redirecting gestures.

689. Plaintiff SOSA alleges that the driver's conduct is relevant because it showed that defendant MORAN's behavior was visible enough and concerning enough that someone close to him attempted to control or redirect him.

690. Plaintiff SOSA alleges that defendant MORAN's conduct was not an isolated misunderstanding.

691. Plaintiff SOSA alleges that defendant MORAN's conduct was the physical escalation of his prior office access, personal questioning, social-event pressure, body scrutiny, repeated dance demands, and sexualized comments.

692. Plaintiff SOSA alleges that defendant MORAN's conduct caused her emotional distress, humiliation, anxiety, embarrassment, fear, and loss of workplace safety.

693. Plaintiff SOSA alleges that defendant MORAN's conduct forms part of her hostile-work-environment, discrimination, retaliation, and aiding-and-abetting claims under the NYSHRL and NYCHRL.

R. Sosa's Probation Is Extended After Moran's Retaliatory UF49 to Risk Management

694. On or about July 2, 2026, plaintiff SOSA was notified to report to Risk Management located at 375 Pearl Street for a probationary monitoring meeting.

695. Plaintiff SOSA was directed to report at approximately 1100 hours.

696. Plaintiff SOSA was informed that representation was not required.

697. Plaintiff SOSA attended the probationary monitoring meeting.

698. Plaintiff SOSA was blindsided by the meeting.

699. During the meeting, two sergeants informed plaintiff SOSA that her probation was being extended.

700. Plaintiff SOSA alleges that her probation was extended because defendant MORAN wrote, caused to be written, submitted, approved, relied upon, or caused Risk Management to receive an unfavorable UF49 concerning her.

701. Plaintiff SOSA alleges that defendant MORAN's unfavorable UF49 to Risk Management was retaliatory.

702. Plaintiff SOSA alleges that defendant MORAN wrote or caused the unfavorable UF49 to Risk Management in retaliation for plaintiff SOSA rejecting, avoiding, or failing to submit to his overt sexual advances.

703. Plaintiff SOSA alleges that the unfavorable UF49 was not a neutral performance document.

704. Plaintiff SOSA alleges that the unfavorable UF49 was not based on legitimate performance concerns.

705. Plaintiff SOSA alleges that the unfavorable UF49 49 was a weaponized personnel document used by defendant MORAN after plaintiff SOSA failed to give him the personal, social, sexual, and submissive attention he wanted.

706. Plaintiff SOSA alleges that defendant MORAN previewed this retaliatory paperwork on or about June 1, 2026, when he summoned her into his office and stated words to the effect of, “I’m asking because I have to write a 49 about you.”

707. Plaintiff SOSA asked defendant MORAN, “A 49 about what specifically?” or words to that effect.

708. Defendant MORAN refused to identify any legitimate basis for the UF49.

709. Defendant MORAN did not identify a performance deficiency.

710. Defendant MORAN did not identify misconduct.

711. Defendant MORAN did not identify a command issue.

712. Defendant MORAN did not identify any legitimate supervisory reason for the threatened or contemplated UF49.

713. Instead, defendant MORAN raised the UF49 while questioning plaintiff SOSA about personal matters, Hispanic Society-related events, and her attendance at future social events.

714. Defendant MORAN then told plaintiff SOSA words to the effect of, “You better come to the events and bring your girlfriends.”

715. Plaintiff SOSA alleges that defendant MORAN’s conduct linked the threatened UF49 to her willingness to provide him with personal access and social-event access.

716. Plaintiff SOSA alleges that defendant MORAN’s statement was coercive because she was a probationary Police Officer and he was the commanding officer.

717. Plaintiff SOSA alleges that defendant MORAN later escalated his conduct after the June 1, 2026 office interaction.

718. On or about June 17, 2026, defendant MORAN commented on plaintiff SOSA's shorts during the 46th Precinct fishing trip and stated words to the effect that she would be the reason he got a log dropped on him or got in trouble.

719. On or about June 27, 2026, defendant MORAN pressured plaintiff SOSA to dance with him at the New York Dominican Officers Organization ("NYDO") Tipico party, repeatedly telling her she owed him a dance.

720. At the NYDO Tipico party, defendant MORAN gave plaintiff SOSA an unwanted tight hug, offered tequila, repeatedly pressured her to dance, and continued engaging in sexualized and coercive conduct toward subordinate female members.

721. At the NYDO Tipico party, defendant MORAN intentionally untied the knot securing plaintiff SOSA's dress while touching the back of her neck.

722. Plaintiff SOSA immediately grabbed the front of her dress to prevent her breasts from being exposed in front of coworkers and Department members.

723. Plaintiff SOSA alleges that defendant MORAN's conduct at the NYDO Tipico party constituted an overt sexual advance, physical boundary violation, and public sexual humiliation by the commanding officer.

724. Plaintiff SOSA alleges that she did not welcome defendant MORAN's sexualized attention.

725. Plaintiff SOSA alleges that she did not invite defendant MORAN's physical contact.

726. Plaintiff SOSA alleges that she did not consent to defendant MORAN untying her dress.

727. Plaintiff SOSA alleges that she did not give defendant MORAN the personal, sexual, or submissive response he wanted.

728. Plaintiff SOSA alleges that, after she rejected, avoided, or failed to submit to defendant MORAN's overt sexual advances, defendant MORAN retaliated by writing, causing, submitting, or relying upon an unfavorable UF49 to Risk Management.

729. Plaintiff SOSA alleges that the unfavorable UF49 became the mechanism used to extend her probation.

730. Plaintiff SOSA alleges that the probation extension was professionally damaging, intimidating, and emotionally devastating.

731. Plaintiff SOSA alleges that the probation extension made her feel defeated, exposed, and professionally trapped.

732. Plaintiff SOSA alleges that, as a probationary Police Officer, she was especially vulnerable to UF49 documentation, Risk Management review, probationary monitoring, probation extensions, and termination-related consequences.

733. Plaintiff SOSA alleges that defendant MORAN exploited that vulnerability.

734. Plaintiff SOSA alleges that defendant MORAN used the probationary process as a retaliatory weapon after she did not submit to his sexualized conduct.

735. Plaintiff SOSA alleges that the UF49 and probation extension were part of the same coercive pattern: private office access, unexplained paperwork threats, social-event pressure, body scrutiny, forced dancing, unwanted touching, dress-untying, and retaliatory employment action.

736. Plaintiff SOSA alleges that the probation extension was not experienced as a neutral personnel decision because it followed defendant MORAN's unexplained UF49 threat and escalating sexual misconduct.

737. Plaintiff SOSA alleges that the probation extension made her fear that refusing, avoiding, or reporting defendant MORAN could jeopardize her NYPD career.

738. Plaintiff SOSA alleges that defendant MORAN's conduct forced her to choose between protecting her dignity and protecting her probationary employment.

739. Plaintiff SOSA alleges that defendant MORAN's retaliatory UF49 to Risk Management and the resulting probation extension caused emotional distress, anxiety, humiliation, fear, and loss of workplace safety.

740. Plaintiff SOSA alleges that defendants used or permitted the probationary process to deepen the coercion and professional vulnerability created by defendant MORAN's sexual harassment.

741. Plaintiff SOSA alleges that the retaliatory UF49, Risk Management involvement, and probation extension form part of her hostile-work-environment, retaliation, discrimination, and adverse-treatment claims under the NYSHRL and NYCHRL.

742. Plaintiff SOSA alleges that the retaliatory UF49 and probation extension are relevant to defendant CITY's and defendant TISCH's liability because the Department failed to protect a probationary female Latina and Dominican Police Officer from command-level sexual harassment and instead allowed her employment status to be used as part of the coercive and retaliatory environment.

Plaintiff BRITTANY N. ROMERO

S. Moran Uses a Command-Level Bet to Create Personal Access to Plaintiff Romero

743. Plaintiff BRITTANY ROMERO is a Latina female NYPD Police Officer.

744. Plaintiff ROMERO is Puerto Rican and Ecuadorian.

745. At all relevant times, plaintiff ROMERO was assigned to the NYPD's 46th Precinct in Bronx County.

746. At all relevant times, plaintiff ROMERO was subordinate to defendant MORAN's command authority, supervision, influence, and control.

747. Plaintiff ROMERO worked in the same highly sexualized, undisciplined, and retaliatory command atmosphere alleged herein by plaintiffs AVILA and SOSA.

748. Plaintiff ROMERO alleges that defendant MORAN used his rank as commanding officer to create personal access to her, pressure her to attend Department-related social events, repeatedly tell her that she "owed" him, touch her without consent, sexualize her appearance, pressure her to dance, make sexualized comments about divorce and his pension, and make her feel uncomfortable, targeted, humiliated, and unsafe in the workplace.

749. Plaintiff ROMERO alleges that defendant MORAN's conduct toward her was motivated, at least in part, by her sex, gender, race, ethnicity, and national origin as a Latina, Puerto Rican, and Ecuadorian female Police Officer.

750. On or about June 7, 2026, plaintiff ROMERO was working crime-reduction overtime from approximately 1730 hours to 0205 hours.

751. During that tour, plaintiff ROMERO returned to the 46th Precinct with her partner Police Officer Nicole L. Ribott to use the restroom.

752. After using the restroom, plaintiff ROMERO waited for her partner near the front desk gate of the command.

753. Plaintiff ROMERO was standing near the administrative office.

754. Defendant MORAN and his driver Police Officer Johnny E. exited the administrative office and stopped beside plaintiff ROMERO.

755. Defendant MORAN and his driver spoke loudly enough for plaintiff ROMERO to hear their conversation about an upcoming basketball game.

756. Defendant MORAN stated words to the effect that he believed the Knicks would lose.

757. Plaintiff ROMERO laughed to herself because she disagreed.

758. Defendant MORAN asked plaintiff ROMERO what was funny.

759. Plaintiff ROMERO responded that she heard defendant MORAN say the Knicks would lose and that she disagreed.

760. Defendant MORAN then proposed a bet.

761. Defendant MORAN stated words to the effect that if the Knicks won, plaintiff ROMERO could take any day off she wanted, but if she lost, she had to join the run taking place that Saturday.

762. Plaintiff ROMERO did not want to attend the run because she had family obligations.

763. Plaintiff ROMERO nevertheless agreed because defendant MORAN put her on the spot.

764. Plaintiff ROMERO alleges that she did not experience the bet as an equal or harmless social exchange.

765. Plaintiff ROMERO alleges that the bet carried command pressure because defendant MORAN was the commanding officer and she was a subordinate Police Officer.

766. Plaintiff ROMERO alleges that defendant MORAN used the bet to create a personal obligation, future contact, and a reason to continue engaging her.

767. Plaintiff ROMERO alleges that this was her first and only conversation with defendant MORAN before the New York Dominican Officers Organization Tipico party.

768. Plaintiff ROMERO had tried to steer clear of defendant MORAN because of negative comments and negative experiences that other members had reported about him throughout the command.

769. Plaintiff ROMERO alleges that her attempts to avoid defendant MORAN were reasonable because the 46th Precinct was already marked by sexualized misconduct, poor discipline, command-level abuse, and fear of retaliation.

770. Plaintiff ROMERO alleges that the June 7, 2026 interaction made her uncomfortable because defendant MORAN used a public command setting to place her into a personal obligation she did not want.

T. Moran Pressures Plaintiff Romero with Repeated “You Owe Me” Comments

771. On or about June 9, 2026, plaintiff ROMERO reported to work.

772. Defendant MORAN was near the desk.

773. Defendant MORAN stopped plaintiff ROMERO and told her words to the effect of, “You owe me.”

774. Defendant MORAN stated that plaintiff ROMERO lost the bet and needed to attend the run.

775. Defendant MORAN asked plaintiff ROMERO for her phone number so he could send her information for the run.

776. Plaintiff ROMERO provided defendant MORAN with her phone number.

777. Defendant MORAN then sent plaintiff ROMERO the link to register for the run.

778. Plaintiff ROMERO did not want to attend the run because she had family obligations.

779. Plaintiff ROMERO alleges that she felt unable to simply tell defendant MORAN that she had plans because she feared he would become upset.

780. Plaintiff ROMERO alleges that her fear was reasonable because defendant MORAN was the commanding officer and because the 46th Precinct atmosphere made resistance to command-level personal attention feel professionally risky.

781. On or about June 13, 2026, plaintiff ROMERO sent defendant MORAN a message advising him that she could not attend the run because she had to take her daughter to a soccer game.

782. Defendant MORAN replied, “No worries! There will be plenty of others.”

783. Plaintiff ROMERO felt relief because defendant MORAN did not appear upset.

784. During the week of June 15, 2026 through June 19, 2026, defendant MORAN repeatedly told plaintiff ROMERO words to the effect of, “You owe me,” when he saw her in passing.

785. Plaintiff ROMERO alleges that defendant MORAN’s repeated “You owe me” comments were coercive, personal, and inappropriate.

786. Plaintiff ROMERO alleges that the comments communicated that the commanding officer believed she owed him future compliance, personal attention, or attendance at Department-related social events.

787. Plaintiff ROMERO alleges that defendant MORAN's repeated comments made her uncomfortable and reinforced her fear that he was using his rank to create an obligation between them.

788. Plaintiff ROMERO alleges that the repeated "You owe me" comments were part of defendant MORAN's pattern of using command authority, social-event pressure, and personal access to control subordinate female members of service.

U. Moran Sexualizes Plaintiff Romero at the NYDO Tipico Party

789. On or about June 26, 2026, plaintiff ROMERO attended the New York Dominican Officers Organization ("NYDO") Tipico party.

790. The NYDO Tipico party was a department-related off-duty event involving NYPD members, Department relationships, affinity-organization relationships, command social networks, and workplace culture.

791. Plaintiff ROMERO arrived at approximately 2210 hours and walked to the table reserved for her and her friends.

792. When plaintiff ROMERO arrived, friends at the table informed her that defendant MORAN had already visited the table and bought a bottle for them.

793. At approximately 2220 hours, defendant MORAN returned to plaintiff ROMERO's table.

794. Defendant MORAN asked plaintiff ROMERO words to the effect of, "Where is Sergeant Avila?"

795. Defendant MORAN told plaintiff ROMERO to take a photograph of them and send it to plaintiff AVILA.

796. Plaintiff ROMERO told defendant MORAN that plaintiff AVILA usually did not attend work-related parties.

797. Plaintiff ROMERO took the photograph and sent it to plaintiff AVILA.

798. Plaintiff ROMERO alleges that defendant MORAN's request showed that he was monitoring plaintiff AVILA's absence from Department-related social events.

799. Plaintiff ROMERO further alleges that defendant MORAN used plaintiff ROMERO to contact or pressure plaintiff AVILA through a Department-related social setting.

800. Immediately after the photograph, defendant MORAN told plaintiff ROMERO words to the effect of, "Your dress is not authorized and I need to inspect it."

801. Plaintiff ROMERO did not expect the commanding officer to make a comment like that.

802. Plaintiff ROMERO alleges that the comment made her uncomfortable.

803. Plaintiff ROMERO laughed nervously.

804. Defendant MORAN then told plaintiff ROMERO words to the effect of, "You are going to be an IAB log for me."

805. Plaintiff ROMERO alleges that defendant MORAN's dress-inspection comment was sexualized, appearance-based, and coercive.

806. Plaintiff ROMERO alleges that defendant MORAN's IAB-log comment showed that he knew his conduct was improper and could create a complaint.

807. Plaintiff ROMERO alleges that hearing that comment from the person who was supposed to lead her command made her feel unsafe, disgusted, and professionally trapped.

808. Throughout the night, defendant MORAN placed his fingers in the dimple on plaintiff ROMERO's right cheek on different occasions.

809. Plaintiff ROMERO alleges that defendant MORAN's touching was unwanted.

810. Plaintiff ROMERO alleges that defendant MORAN's touching made her very uncomfortable.

811. Plaintiff ROMERO did not know what to say because defendant MORAN was the commanding officer and she was a subordinate Police Officer.

812. On one occasion when defendant MORAN placed his finger in plaintiff ROMERO's dimple, he told her words to the effect of, "You owe me and you and your girls must attend the all-white boat party coming up on July 31st."

813. Plaintiff ROMERO alleges that defendant MORAN used the same "You owe me" pressure to demand future attendance by plaintiff ROMERO and other women at another Department-related social event.

814. Plaintiff ROMERO alleges that defendant MORAN's statement made her feel that the NYDO Tipico party was not isolated and that he intended to continue using off-duty Department-related events to obtain access to subordinate female members.

815. During the NYDO Tipico party, defendant MORAN came to the table and bought each woman at the table a rose.

816. Throughout the night, defendant MORAN revisited plaintiff ROMERO's table and asked every female member to dance.

817. Defendant MORAN asked plaintiff ROMERO to dance more than once.

818. Plaintiff ROMERO politely declined more than once.

819. After defendant MORAN repeatedly asked, plaintiff ROMERO eventually got up to dance and then returned to her seat.

820. Plaintiff ROMERO alleges that she did not dance because she wanted to dance with defendant MORAN.

821. Plaintiff ROMERO alleges that she danced because the commanding officer repeatedly pressured her and she wanted the pressure to stop.

822. During the night, defendant MORAN made additional comments to plaintiff ROMERO, including words to the effect of, “You are worth getting a divorce for,” and “You are worth my pension.”

823. Plaintiff ROMERO alleges that these comments were sexualized, degrading, and blame-shifting.

824. Plaintiff ROMERO alleges that defendant MORAN’s divorce-and-pension comments made her feel disgusted.

825. Plaintiff ROMERO alleges that the comments suggested that she, a subordinate Latina female Police Officer, would be framed as the reason for the commanding officer’s marital or professional consequences.

826. Plaintiff ROMERO felt like she was playing musical chairs or ring-around-the-rosie trying to move away from defendant MORAN.

827. Plaintiff ROMERO alleges that she was attempting to move away from defendant MORAN without openly confronting him because he was her commanding officer.

828. Plaintiff ROMERO alleges that her friends also felt uncomfortable and were trying to avoid defendant MORAN’s conduct.

829. Plaintiff ROMERO observed defendant MORAN make other women visibly uncomfortable through his words and actions.

830. Plaintiff ROMERO observed defendant MORAN untie the knot holding plaintiff SOSA's dress in place.

831. Plaintiff ROMERO observed that plaintiff SOSA was immediately embarrassed.

832. Plaintiff ROMERO alleges that no member of service should have to experience what defendant MORAN did to plaintiff SOSA.

833. Plaintiff ROMERO alleges that observing defendant MORAN untie plaintiff SOSA's dress reinforced her fear that defendant MORAN's conduct was escalating and that subordinate female members were not safe from sexual humiliation at Department-related events.

834. Plaintiff ROMERO observed that the delegate, who was also defendant MORAN's driver, followed defendant MORAN around throughout the night in what appeared to be an effort to keep defendant MORAN under control.

835. Plaintiff ROMERO alleges that the driver's conduct showed defendant MORAN's behavior was visible, concerning, and known to others at the event.

836. Plaintiff ROMERO alleges that defendant MORAN's conduct at the NYDO Tipico party made her feel disgusted, uncomfortable, unsafe, humiliated, and targeted by the commanding officer of her precinct.

837. Plaintiff ROMERO alleges that defendant MORAN's conduct was not disconnected from the workplace because the NYDO Tipico party was a department-related event and defendant MORAN remained the commanding officer with authority, influence, and control over subordinate members assigned to the 46th Precinct.

V. Moran's Post-Event Apology Shows Consciousness of Boundary-Crossing

838. On or about June 27, 2026, the morning after the NYDO Tipico party, plaintiff ROMERO received a text message from defendant MORAN.

839. Defendant MORAN wrote words to the effect of, “Hi, so Johnny just told me I was out of control last night. So I apologize if I crossed any lines.”

840. Plaintiff ROMERO replied, “No worries.”

841. Plaintiff ROMERO alleges that her “No worries” response did not mean defendant MORAN’s conduct was welcome, appropriate, harmless, or acceptable.

842. Plaintiff ROMERO alleges that she minimized her response because defendant MORAN was the commanding officer and she did not want to create conflict, anger him, or invite professional consequences.

843. Plaintiff ROMERO alleges that defendant MORAN’s apology confirms that his own driver or delegate told him he was “out of control.”

844. Plaintiff ROMERO alleges that defendant MORAN’s apology confirms that defendant MORAN understood he may have crossed boundaries.

845. Plaintiff ROMERO alleges that defendant MORAN’s post-event apology is evidence of consciousness of wrongdoing.

846. Plaintiff ROMERO alleges that defendant MORAN’s post-event apology corroborates that his conduct at the NYDO Tipico party was not ordinary social interaction, but command-level sexualized misconduct at a department-related event.

847. Plaintiff ROMERO alleges that defendant MORAN’s conduct caused her humiliation, disgust, anxiety, fear, discomfort, loss of dignity, and loss of workplace safety.

848. Plaintiff ROMERO alleges that defendant MORAN's conduct forms part of the sexual harassment, hostile work environment, discrimination, retaliation, and aiding-and-abetting claims under the NYSHRL and NYCHRL.

W. Pattern, Notice, and Recurrence

849. Plaintiffs allege that defendant MORAN's conduct toward AVIL, SOSA and ROMERO was not isolated, accidental, or misunderstood.

850. Plaintiffs allege that MORAN's conduct formed part of a recurring pattern of command-level sexual harassment, social-event pressure, appearance-based scrutiny, ethnicized attention, intimidation, and retaliation.

851. Plaintiffs allege that MORAN used multiple workplace-connected settings to carry out this pattern, including the 46th Precinct, his commanding officer's office, Department vehicles, command-related off-duty events, precinct-club functions, NYPD affinity-organization events, and Department-related social spaces.

852. Plaintiffs allege that those settings remained connected to the workplace because MORAN continued to hold command rank, authority, influence, and practical control over subordinate members of service.

853. Plaintiffs allege that MORAN's conduct toward other members, including Officer Steven Disla, Officer Kimberly Lugo, and other members of service, further confirms pattern, motive, foreseeability, and recurrence.

854. Plaintiffs allege that MORAN's conduct toward Disla reflected rank-based intimidation, humiliation, assignment-related pressure, and references to Department connections.

855. Plaintiffs allege that MORAN's conduct toward Lugo reflected appearance-based scrutiny, inappropriate personal favoritism, sexualized attention, and blame-shifting comments about his marriage, pension, or career consequences.

856. Plaintiffs allege that MORAN's conduct toward other members made AVILA, SOSA and ROMERO reasonably believe that his misconduct was broader than one interaction, one event, one woman, or one location.

857. Plaintiffs allege that the recurrence of conduct toward multiple members supports the totality of the circumstances underlying their hostile-work-environment claims.

858. Plaintiffs allege that the recurrence of conduct supports their retaliation claims because it shows why subordinate members reasonably feared professional consequences if they resisted, avoided, complained about, or failed to satisfy MORAN's personal demands.

859. Plaintiffs allege that the recurrence of conduct supports defendant CITY's and defendant TISCH's liability because MORAN's conduct occurred in and around a command already requiring heightened scrutiny.

860. Plaintiffs allege that MORAN's conduct was foreseeable because the 46th Precinct already had a documented history of command-level sexual misconduct, mandated-reporter failures, retaliation, and institutional protection of ranking officers.

861. Plaintiffs allege that defendants failed to prevent MORAN from repeating, continuing, or deepening the same sexually hostile and retaliatory command culture.

862. Plaintiffs allege that MORAN abused the authority of the commanding officer's position to create a sexually hostile, intimidating, discriminatory, and retaliatory work environment.

X. Race, Ethnicity, and National-Origin Animus Toward Latina, Dominican, Puerto Rican, and Ecuadorian Plaintiffs

863. Plaintiffs AVILA, SOSA, and ROMERO are Latina female NYPD members of service.

864. Plaintiffs AVILA and SOSA are Dominican.

865. Plaintiff ROMERO is Puerto Rican and Ecuadorian.

866. Plaintiffs allege that MORAN's conduct was motivated, at least in part, by plaintiffs' sex, gender, race, ethnicity, and national origin.

867. Plaintiffs allege that MORAN did not merely sexualize plaintiffs as women; he sexualized, stereotyped, degraded, and targeted them as Latina women, including Dominican, Puerto Rican, and Ecuadorian subordinate female members of service.

868. MORAN told AVILA words to the effect of, "I love a strong Latina."

869. Plaintiffs allege that the "strong Latina" comment sexualized AVILA's Latina identity and reduced her to a gendered and ethnic stereotype.

870. MORAN also made the Dominican Republic boat comment to AVILA during the June 17, 2026 fishing trip.

871. Plaintiffs allege that the Dominican Republic boat comment invoked degrading stereotypes concerning Dominican migration, poverty, foreignness, and national origin.

872. MORAN questioned SOSA about Hispanic Society-related events.

873. MORAN then told SOSA words to the effect of, "You better come to the events and bring your girlfriends."

874. Plaintiffs allege that MORAN's questioning linked SOSA's Latina and Dominican identity, ethnic-affinity spaces, female social circle, and subordinate status to his desire for personal and social-event access.

875. MORAN later used the New York Dominican Officers Organization (“NYDO”) Tipico party, a department-related Dominican-affinity event, to pressure, touch, sexualize, and humiliate SOSA.

876. MORAN also used the NYDO Tipico party to pressure, touch, sexualize, and humiliate ROMERO, a Latina, Puerto Rican, and Ecuadorian subordinate Police Officer.

877. At the NYDO Tipico party, MORAN told ROMERO words to the effect of, “Your dress is not authorized and I need to inspect it.”

878. MORAN also told ROMERO words to the effect of, “You are going to be an IAB log for me.”

879. MORAN repeatedly placed his fingers in the dimple on ROMERO’s right cheek.

880. MORAN told ROMERO words to the effect of, “You owe me and you and your girls must attend the all-white boat party coming up on July 31st.”

881. MORAN made additional sexualized comments to ROMERO, including words to the effect of, “You are worth getting a divorce for,” and “You are worth my pension.”

882. Plaintiffs allege that MORAN’s conduct toward ROMERO linked her Latina identity, female social circle, subordinate Police Officer status, and ethnic-affinity Department setting to his desire for personal, physical, and social-event access.

883. Plaintiffs allege that MORAN’s conduct at the NYDO Tipico party reflected the sexualization of Latina subordinate female officers in an ethnic-affinity Department setting.

884. Plaintiffs further allege that MORAN’s conduct at the NYDO Tipico party was not isolated to one plaintiff, but targeted and affected multiple Latina subordinate female members, including SOSA and ROMERO.

885. Plaintiffs allege that MORAN wrongfully assumed that Latina subordinate women, including Dominican, Puerto Rican, and Ecuadorian women, would remain silent, manage the shame, avoid public confrontation, and fear workplace stigma.

886. Plaintiffs allege that MORAN's sex-based and gender-based conduct was intertwined with race-, ethnicity-, and national-origin-based conduct.

887. Plaintiffs allege that MORAN used Department-related ethnic-affinity spaces, including Hispanic Society-related events and the NYDO Tipico party, as access points to pressure, sexualize, and control Latina subordinate female members of service.

888. Plaintiffs allege that MORAN's conduct subjected them to inferior terms, conditions, and privileges of employment because of their sex, gender, race, ethnicity, and national origin.

889. Plaintiffs allege that defendants are liable for race, ethnicity, national-origin, sex, and gender discrimination, hostile work environment, retaliation, and aiding and abetting under the NYSHRL and NYCHRL.

Y. The NYPD's Failure to Protect Plaintiffs and Ratification of Moran's Conduct

890. Plaintiffs allege that defendant CITY, NYPD, and defendant TISCH failed to protect plaintiffs AVILA, SOSA, and ROMERO from defendant MORAN.

891. Plaintiffs allege that this failure was not a first-time institutional mistake because the CITY, NYPD, and TISCH were already on notice that the 46th Precinct had a sexual-misconduct problem, supervisory-abuse problem, retaliation problem, and reporting-culture problem.

892. Plaintiffs allege that the N.T. action placed defendants on notice that the 46th Precinct required heightened scrutiny, credible anti-harassment enforcement, supervision of supervisors, and protection for complainants and subordinate female members of service.

893. Plaintiffs allege that TISCH placed or permitted MORAN to serve as commanding officer of that compromised command without sufficient safeguards.

894. Plaintiffs allege that defendants failed to meaningfully monitor, supervise, restrict, investigate, discipline, or remove MORAN after he engaged in conduct consistent with the very risks already known to exist inside the 46th Precinct.

895. Plaintiffs allege that MORAN's conduct toward AVILA, SOSA, and ROMERO showed the same command-level failure: a commanding officer using rank, access, Department-related events, personal pressure, unwanted physical contact, sexualized comments, paperwork threats, and retaliation-linked intimidation against subordinate female members of service.

896. Plaintiffs allege that AVILA reported MORAN's conduct to IAB and OEI.

897. Plaintiffs allege that the Department failed to provide AVILA with a prompt, clear, credible, and protective response.

898. Plaintiffs allege that AVILA's complaint appeared to disappear between IAB and OEI, and that she was treated as a problem to be warned rather than a victim to be protected.

899. Plaintiffs allege that, after AVILA's protected complaints, she was subjected to retaliatory sick-leave scrutiny, including an Absence Control visit to her residence.

900. Plaintiffs allege that MORAN then made retaliatory threats concerning members who called IAB and OEI on him, including statements that they would "pay" and that he had "friends everywhere."

901. Plaintiffs allege that defendants failed to immediately remove MORAN from command authority over AVILA.

902. Plaintiffs allege that the Department instead transferred AVILA from the 46th Precinct to the 47th Precinct on or about July 6, 2026.

903. Plaintiffs allege that transferring AVILA rather than removing MORAN placed the burden of the misconduct on the victim and ratified the hostile and retaliatory command environment.

904. Plaintiffs allege that defendants also failed to protect SOSA.

905. Plaintiffs allege that MORAN wrote, caused to be written, submitted, approved, relied upon, or caused Risk Management to receive an unfavorable UF49 concerning SOSA in retaliation for her rejecting, avoiding, or failing to submit to his overt sexual advances.

906. Plaintiffs allege that defendants used or permitted Risk Management and the probationary process to extend SOSA's probation, thereby deepening the coercive and retaliatory environment created by MORAN.

907. Plaintiffs allege that defendants failed to treat the UF49, Risk Management involvement, and probation extension as part of the same pattern of command-level sexual harassment and retaliation.

908. Plaintiffs allege that defendants also failed to protect ROMERO.

909. Plaintiffs allege that MORAN used his position as commanding officer to create personal access to ROMERO, obtain her phone number, repeatedly tell her that she "owed" him, pressure her to attend Department-related social events, touch her without consent, sexualize her appearance, pressure her to dance, and make sexualized comments about divorce and his pension.

910. Plaintiffs allege that MORAN's conduct toward ROMERO occurred in Department spaces and Department-related off-duty settings connected to NYPD members, affinity organizations, command relationships, supervisory hierarchy, workplace culture, and future workplace consequences.

911. Plaintiffs allege that MORAN's conduct toward ROMERO was visible to other Department members at the NYDO Tipico party.

912. Plaintiffs allege that MORAN's own driver or delegate followed MORAN around during the NYDO Tipico party in what appeared to be an effort to keep MORAN under control.

913. Plaintiffs allege that the driver's conduct showed that MORAN's behavior was visible, concerning, and known to others at the event.

914. Plaintiffs allege that MORAN's June 27, 2026 text message to ROMERO, stating words to the effect of, "Hi, so Johnny just told me I was out of control last night. So I apologize if I crossed any lines," further confirmed that MORAN's misconduct was known, observable, and recognized as boundary-crossing.

915. Plaintiffs allege that defendants failed to treat MORAN's conduct toward ROMERO as part of the same sexually hostile, discriminatory, and command-compromised pattern that affected AVILA and SOSA.

916. Plaintiffs allege that defendants failed to treat MORAN's conduct at the NYDO Tipico party as workplace-connected misconduct even though the event involved NYPD members, Department-related affinity networks, subordinate members assigned to MORAN's command, and MORAN's continuing authority as commanding officer.

917. Plaintiffs allege that defendants failed to treat MORAN's conduct toward SOSA and ROMERO at the NYDO Tipico party as corroborating evidence of a broader pattern of command-level sexual harassment, humiliation, and abuse of authority.

918. Plaintiffs allege that defendants' response protected the command structure instead of protecting the women harmed by it.

919. Plaintiffs allege that defendants' conduct and omissions constitute employer liability, ratification, aiding and abetting, retaliation, and failure to take reasonable corrective action under the NYSHRL and NYCHRL.

Z. Plaintiffs' Injuries, Career Harm, Emotional Distress, and Damages

920. Plaintiffs suffered injuries as a result of defendants' unlawful conduct.

921. Plaintiffs suffered emotional distress, humiliation, embarrassment, anxiety, fear, anger, sadness, disgust, loss of dignity, and loss of workplace safety.

922. Plaintiffs suffered harm because the harassment, discrimination, retaliation, and abuse of authority came from the commanding officer of their precinct.

923. Plaintiffs suffered harm because MORAN used command authority, rank, workplace resources, Department-related events, personnel documentation, probationary vulnerability, social-event pressure, unwanted physical contact, and retaliation to make ordinary resistance professionally dangerous.

924. Plaintiffs suffered harm because MORAN's conduct occurred in workplace and Department-related settings where plaintiffs remained subordinate to his authority, influence, reputation, and ability to affect their careers.

925. AVILA suffered emotional distress, humiliation, fear, anxiety, loss of dignity, loss of workplace safety, and career disruption.

926. AVILA suffered harm when she was transferred from the 46th Precinct to the 47th Precinct after reporting MORAN.

927. AVILA suffered harm because she was removed from the command she had chosen and where she intended to build her supervisory career.

928. AVILA suffered harm because she felt watched, monitored, controlled, professionally unsafe, and afraid in and around the workplace.

929. SOSA suffered emotional distress, humiliation, fear, anxiety, embarrassment, loss of dignity, loss of workplace safety, and professional vulnerability.

930. SOSA suffered harm when MORAN allegedly used an unfavorable UF49, Risk Management, and the probationary process against her after she rejected, avoided, or failed to submit to his overt sexual advances.

931. SOSA suffered harm when her probation was extended.

932. SOSA suffered harm because she was forced to choose between protecting her dignity and protecting her probationary employment.

933. SOSA suffered harm when MORAN allegedly untied the knot holding her dress in place at the NYDO Tipico party, causing immediate embarrassment, fear, humiliation, and loss of bodily privacy in front of Department members and other event attendees.

934. ROMERO suffered emotional distress, humiliation, discomfort, disgust, anxiety, fear, embarrassment, loss of dignity, loss of workplace safety, and professional vulnerability.

935. ROMERO suffered harm when MORAN used a command-level bet to create personal access to her and then repeatedly told her that she “owed” him.

936. ROMERO suffered harm when MORAN obtained her phone number through command pressure and used the alleged bet and run-related obligation to continue personal contact with her.

937. ROMERO suffered harm when MORAN used the NYDO Tipico party, a department-related off-duty event, to pressure, touch, sexualize, and humiliate her.

938. ROMERO suffered harm when MORAN commented that her dress was “not authorized” and that he needed to “inspect it.”

939. ROMERO suffered harm when MORAN told her words to the effect of, “You are going to be an IAB log for me,” because the comment made clear that MORAN knew his conduct was improper while continuing to place her in an uncomfortable and professionally risky position.

940. ROMERO suffered harm when MORAN repeatedly placed his fingers in the dimple on her right cheek without her consent.

941. ROMERO suffered harm when MORAN repeatedly pressured her to dance after she declined.

942. ROMERO suffered harm when MORAN told her words to the effect of, “You are worth getting a divorce for,” and “You are worth my pension.”

943. ROMERO suffered harm because those comments sexualized her, degraded her, and implied that she, a subordinate Latina female Police Officer, could be blamed for the commanding officer’s marital or professional consequences.

944. ROMERO suffered harm when she felt forced to move around the event to avoid MORAN without openly confronting him because he remained her commanding officer.

945. ROMERO suffered harm when she observed MORAN untie the knot holding SOSA's dress in place, because the incident reinforced that subordinate female members were not safe from sexual humiliation at Department-related events.

946. ROMERO suffered harm when she received MORAN's June 27, 2026 text message apologizing after being told he was "out of control," because the message confirmed that his conduct was recognized as boundary-crossing while leaving ROMERO to manage the discomfort, pressure, and workplace consequences of responding to her commanding officer.

947. Plaintiffs allege that defendants' conduct interfered with their ability to perform their duties in a workplace free from discrimination, harassment, retaliation, intimidation, sexualized command pressure, and abuse of command authority.

948. Plaintiffs allege that defendants' conduct damaged their professional reputations, command standing, workplace relationships, career security, sense of safety, and future opportunities.

949. Plaintiffs allege that defendants deprived them of equal terms, conditions, and privileges of employment.

950. Plaintiffs allege that defendants' conduct was willful, wanton, reckless, malicious, and/or undertaken with disregard for plaintiffs' rights.

951. Plaintiffs seek compensatory damages, emotional-distress damages, lost wages and benefits where applicable, front pay where applicable, back pay where applicable, punitive damages against the individual defendants to the extent permitted by law, pre-judgment and post-judgment interest, attorneys' fees, costs, disbursements, declaratory relief, injunctive relief, and all other relief the Court deems just and proper.

VIOLATIONS AND CLAIMS ALLEGED**COUNT I****Sexual Harassment Under the New York State Human Rights Law
Against Defendant THE CITY OF NEW YORK,
and Against Defendants TISCH and MORAN for Aiding and Abetting**

952. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

953. Plaintiffs AVILA, SOSA, and ROMERO are women and were employees of defendant THE CITY OF NEW YORK within the meaning of the New York State Human Rights Law.

954. Defendant THE CITY OF NEW YORK, acting through the NYPD, defendant MORAN, defendant TISCH, and other NYPD officials, supervisors, agents, and employees, subjected plaintiffs to sexual harassment in violation of Executive Law § 296.

955. Defendant MORAN subjected plaintiffs to unwelcome sexualized comments, personal boundary violations, coercive social-event pressure, unwanted physical contact, public sexual humiliation, appearance-based scrutiny, sexually charged remarks, and retaliation-linked intimidation.

956. Defendant MORAN's conduct subjected plaintiffs to inferior terms, conditions, and privileges of employment because of their sex and gender.

957. Plaintiffs were not required to tolerate a workplace where the commanding officer used rank, access, social events, Department-related spaces, paperwork, and retaliation to sexualize, humiliate, pressure, and control subordinate female members of service.

958. Defendant THE CITY OF NEW YORK is liable because MORAN was plaintiffs' commanding officer and used authority, access, rank, and workplace power supplied by the NYPD to commit the sexual harassment alleged herein.

959. Defendant THE CITY OF NEW YORK is further liable because the NYPD knew or should have known that the 46th Precinct was a sexually compromised command requiring heightened scrutiny and failed to prevent, stop, correct, or remedy MORAN's conduct.

960. Defendant MORAN aided, abetted, incited, compelled, and coerced the sexual harassment alleged herein by directly participating in the unlawful conduct.

961. Defendant TISCH aided, abetted, incited, compelled, and coerced the sexual harassment alleged herein by selecting, approving, assigning, retaining, supervising, failing to supervise, ratifying, or permitting MORAN to exercise command authority inside a precinct already known to require heightened scrutiny and protection for subordinate female members of service.

962. As a direct and proximate result of defendants' unlawful conduct, plaintiffs suffered emotional distress, humiliation, fear, anxiety, loss of dignity, loss of workplace safety, career harm, and other damages.

COUNT II
Race, Ethnicity, and National-Origin Discrimination Under
the New York State Human Rights Law
Against Defendant THE CITY OF NEW YORK, and Against
Defendants TISCH and MORAN for Aiding and Abetting

963. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

964. Plaintiffs AVILA and SOSA are Latina and Dominican members of service.

965. Plaintiff BRITTANY N. ROMERO is Puerto Rican and Ecuadorian.

966. Plaintiffs are protected from race, ethnicity, and national-origin discrimination under the New York State Human Rights Law.

967. Defendant THE CITY OF NEW YORK, acting through the NYPD, defendant MORAN, defendant TISCH, and other NYPD officials, supervisors, agents, and employees, discriminated against plaintiffs because of their race, ethnicity, and national origin.

968. Defendant MORAN's conduct toward plaintiffs was motivated, at least in part, by their Latina and Dominican identity.

969. Defendant MORAN sexualized, stereotyped, degraded, and targeted plaintiffs as Latina women, including AVILA and SOSA as Dominican women and ROMERO as a Puerto Rican and Ecuadorian woman, through his "strong Latina" comment to AVILA, his Dominican Republic boat comment to AVILA, his questioning of SOSA about Hispanic Society-related events, his conduct toward SOSA at the New York Dominican Officers Organization Tipico party, and his conduct toward ROMERO at the same Department-related ethnic-affinity event, including his dress-inspection comment, unwanted touching of her cheek, repeated "you owe me" comments, pressure to attend the all-white boat party with "your girls," pressure to dance, and comments that she was "worth getting a divorce for" and "worth my pension."

970. Defendant MORAN's conduct subjected plaintiffs to inferior terms, conditions, and privileges of employment because of their race, ethnicity, and national origin.

971. Defendant THE CITY OF NEW YORK is liable because MORAN was plaintiffs' commanding officer and used NYPD command authority, rank, access, and workplace power to engage in race-, ethnicity-, and national-origin-based discrimination.

972. Defendant THE CITY OF NEW YORK is further liable because the NYPD knew or should have known that the 46th Precinct required heightened scrutiny and failed to prevent, stop, correct, or remedy discriminatory conduct by its commanding officer.

973. Defendant MORAN aided, abetted, incited, compelled, and coerced the discrimination alleged herein by directly participating in the unlawful conduct.

974. Defendant TISCH aided, abetted, incited, compelled, and coerced the discrimination alleged herein by selecting, approving, assigning, retaining, supervising, failing to supervise, ratifying, or permitting MORAN to exercise command authority over Latina and Dominican subordinate female members in a sexually compromised command without sufficient safeguards.

975. As a direct and proximate result of defendants' unlawful conduct, plaintiffs suffered emotional distress, humiliation, fear, anxiety, loss of dignity, loss of workplace safety, career harm, and other damages.

COUNT III

Hostile Work Environment Under the New York State Human Rights Law Against Defendant THE CITY OF NEW YORK, and Against Defendants TISCH and MORAN for Aiding and Abetting

976. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

977. Plaintiffs were entitled to work in an environment free from discrimination, sexual harassment, intimidation, retaliation, and abuse of command authority.

978. Defendant THE CITY OF NEW YORK, acting through the NYPD, defendant MORAN, defendant TISCH, and other NYPD officials, supervisors, agents, and employees, subjected plaintiffs to a hostile work environment because of their sex, gender, race, ethnicity, and national origin.

979. The hostile work environment included command-level sexual harassment, ethnicized and national-origin-based degradation, social-event pressure, public humiliation, unwanted physical contact, paperwork threats, retaliation-linked intimidation, and the use of NYPD command authority to make resistance professionally dangerous.

980. The hostile work environment must be assessed under the totality of the circumstances, including the 46th Precinct's prior sexually compromised command atmosphere, defendants' notice of that atmosphere, MORAN's rank as commanding officer, plaintiffs' subordinate status, SOSA's probationary vulnerability, and the Department's failure to provide prompt and effective protection.

981. Plaintiffs were subjected to inferior terms, conditions, and privileges of employment because of the hostile work environment.

982. Defendant THE CITY OF NEW YORK is liable because MORAN was plaintiffs' commanding officer and used the power, access, and authority supplied by the NYPD to create and maintain the hostile work environment.

983. Defendant THE CITY OF NEW YORK is further liable because the NYPD knew or should have known of the hostile work environment and failed to take prompt, effective, and reasonable corrective action.

984. Defendant MORAN aided, abetted, incited, compelled, and coerced the hostile work environment by directly creating, participating in, and escalating the unlawful conduct.

985. Defendant TISCH aided, abetted, incited, compelled, and coerced the hostile work environment by selecting, approving, assigning, retaining, supervising, failing to supervise, ratifying, or permitting MORAN to exercise command authority inside a precinct already known to be sexually compromised and unsafe for subordinate female members of service.

986. As a direct and proximate result of defendants' unlawful conduct, plaintiffs suffered emotional distress, humiliation, fear, anxiety, loss of dignity, loss of workplace safety, career harm, and other damages.

COUNT IV**Retaliation Under the New York State Human Rights Law
Against Defendant THE CITY OF NEW YORK, and Against
Defendants TISCH and MORAN for Aiding and Abetting**

987. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

988. Plaintiffs engaged in protected activity under the New York State Human Rights Law by resisting, avoiding, opposing, reporting, declining, or refusing to submit to sexual harassment, discriminatory conduct, and hostile-work-environment conduct.

989. Plaintiff AVILA engaged in protected activity when she resisted or avoided MORAN's sexualized and coercive conduct and when she reported MORAN to IAB and OEI.

990. Plaintiff SOSA engaged in protected activity when she rejected, avoided, or failed to submit to MORAN's overt sexual advances and coercive sexualized conduct.

991. Plaintiff ROMERO engaged in protected activity when she tried to avoid MORAN, declined his repeated requests to dance, attempted to move away from him during the NYDO Tipico party, and failed to submit willingly to his sexualized comments, unwanted touching, social-event pressure, and coercive "you owe me" demands.

992. Defendants knew or should have known that plaintiffs engaged in protected activity.

993. After AVILA engaged in protected activity, she was subjected to retaliatory treatment, including denial of an available Department vehicle, efforts by MORAN to reach her through other members, Absence Control scrutiny, retaliatory threats, and transfer from the 46th Precinct to the 47th Precinct.

994. After SOSA engaged in protected activity, MORAN wrote, caused to be written, submitted, approved, relied upon, or caused Risk Management to receive an unfavorable UF49

concerning her in retaliation for her rejection of, avoidance of, or failure to submit to his overt sexual advances.

995. SOSA's probation was thereafter extended through or in connection with the UF49, Risk Management, and probationary process.

996. After ROMERO resisted, declined, avoided, or failed to submit willingly to MORAN's sexualized and coercive conduct, MORAN continued to pressure her, including by repeatedly telling her that she "owed" him, demanding that she and "her girls" attend a future all-white boat party, repeatedly pressuring her to dance after she declined, touching her cheek without consent, and making comments that she was "worth getting a divorce for" and "worth my pension."

997. Plaintiffs allege that MORAN's conduct toward ROMERO was retaliatory, coercive, and intimidation-based because he used his rank as commanding officer to make ordinary resistance feel professionally dangerous.

998. Plaintiffs allege that MORAN's June 27, 2026 text message to ROMERO, apologizing after being told he was "out of control" and stating that he was sorry if he "crossed any lines," confirmed that MORAN knew or should have known that ROMERO had been subjected to boundary-crossing conduct.

999. Defendants' retaliatory acts were reasonably likely to deter plaintiffs and other employees from opposing discrimination, sexual harassment, hostile work environment, or retaliation.

1000. Defendant THE CITY OF NEW YORK is liable because the retaliatory acts were committed through NYPD command authority, supervisory power, Department resources,

personnel processes, Department-related events, workplace mechanisms, and the coercive power of MORAN's position as commanding officer.

1001. Defendant THE CITY OF NEW YORK is further liable because the NYPD failed to protect plaintiffs from retaliation after protected activity and instead permitted the burden of MORAN's misconduct to fall on plaintiffs.

1002. Defendant MORAN aided, abetted, incited, compelled, and coerced the retaliation alleged herein by directly participating in and causing retaliatory acts against plaintiffs.

1003. Defendant TISCH aided, abetted, incited, compelled, and coerced the retaliation alleged herein by selecting, approving, assigning, retaining, supervising, failing to supervise, ratifying, or permitting MORAN to exercise command authority and by failing to ensure prompt and effective protection after plaintiffs opposed, resisted, avoided, declined, or reported unlawful conduct.

1004. As a direct and proximate result of defendants' unlawful retaliation, plaintiffs suffered emotional distress, humiliation, fear, anxiety, loss of dignity, loss of workplace safety, career harm, and other damages.

COUNT V

Sexual Harassment Under the New York City Human Rights Law Against Defendant THE CITY OF NEW YORK, and Against Defendants TISCH and MORAN for Aiding and Abetting

1005. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

1006. Plaintiffs AVILA, SOSA and ROMERO are women and were employees of defendant THE CITY OF NEW YORK within the meaning of the New York City Human Rights Law.

1007. Defendant THE CITY OF NEW YORK, acting through the NYPD, defendant MORAN, defendant TISCH, and other NYPD officials, supervisors, agents, and employees, subjected plaintiffs to sexual harassment in violation of Administrative Code § 8-107.

1008. Defendant MORAN subjected plaintiffs to unwanted sexualized comments, coercive personal access, social-event pressure, appearance-based scrutiny, unwanted physical contact, public sexual humiliation, paperwork threats, and retaliation-linked intimidation.

1009. Plaintiffs were treated less well, and were subjected to inferior terms, conditions, and privileges of employment, because of their sex and gender.

1010. Defendant THE CITY OF NEW YORK is liable because MORAN was plaintiffs' commanding officer and used NYPD rank, authority, access, workplace power, Department-related events, and personnel processes to commit the sexual harassment alleged herein.

1011. Defendant MORAN is liable because he directly participated in the sexual harassment, created and escalated the unlawful conduct, and aided, abetted, incited, compelled, or coerced the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1012. Defendant TISCH is liable because she selected, approved, assigned, retained, supervised, failed to supervise, ratified, or permitted MORAN to exercise command authority inside a sexually compromised command and thereby aided, abetted, incited, compelled, or coerced the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1013. As a direct and proximate result of defendants' unlawful conduct, plaintiffs suffered emotional distress, humiliation, fear, anxiety, loss of dignity, loss of workplace safety, career harm, and other damages.

COUNT VI
Race, Ethnicity, and National-Origin Discrimination Under
the New York City Human Rights Law
Against Defendant THE CITY OF NEW YORK, and Against
Defendants TISCH and MORAN for Aiding and Abetting

1014. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

1015. Plaintiffs AVILA and SOSA are Latina and Dominican members of service.

1016. Plaintiff BRITTANY N. ROMERO is a Latina member of service who is Puerto Rican and Ecuadorian.

1017. Plaintiffs are protected from race, ethnicity, and national-origin discrimination under the New York City Human Rights Law.

1018. Defendant THE CITY OF NEW YORK, acting through the NYPD, defendant MORAN, defendant TISCH, and other NYPD officials, supervisors, agents, and employees, discriminated against plaintiffs because of their race, ethnicity, and national origin.

1019. Defendant MORAN's conduct toward plaintiffs was motivated, at least in part, by their Latina identity and their Dominican, Puerto Rican, and Ecuadorian ethnicity and national origin.

1020. Defendant MORAN sexualized, stereotyped, degraded, and targeted plaintiffs as Latina subordinate female members of service, including AVILA and SOSA as Dominican women and ROMERO as a Puerto Rican and Ecuadorian woman.

1021. Defendant MORAN's discriminatory conduct included his "strong Latina" comment to AVILA, his Dominican Republic boat comment to AVILA, his questioning of SOSA about Hispanic Society-related events, his conduct toward SOSA at the New York Dominican Officers Organization Tipico party, and his conduct toward ROMERO at the same Department-related ethnic-affinity event.

1022. Defendant MORAN's conduct toward ROMERO included his dress-inspection comment, unwanted touching of her cheek, repeated "you owe me" comments, pressure to attend the all-white boat party with "your girls," repeated pressure to dance, and comments that she was "worth getting a divorce for" and "worth my pension."

1023. Defendant MORAN's conduct treated plaintiffs less well and subjected plaintiffs to inferior terms, conditions, and privileges of employment because of their race, ethnicity, and national origin.

1024. Defendant THE CITY OF NEW YORK is liable because MORAN was plaintiffs' commanding officer and used NYPD command authority, rank, access, workplace power, Department-related events, and ethnic-affinity settings to engage in race-, ethnicity-, and national-origin-based discrimination.

1025. Defendant THE CITY OF NEW YORK is further liable because the NYPD knew or should have known that the 46th Precinct required heightened scrutiny and failed to prevent, stop, correct, or remedy discriminatory conduct by its commanding officer.

1026. Defendant MORAN is liable because he directly participated in the discriminatory conduct and aided, abetted, incited, compelled, or coerced the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1027. Defendant TISCH is liable because she selected, approved, assigned, retained, supervised, failed to supervise, ratified, or permitted MORAN to exercise command authority over Latina subordinate female members of service, including Dominican, Puerto Rican, and Ecuadorian members, in a sexually compromised command without sufficient safeguards, and thereby aided, abetted, incited, compelled, or coerced the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1028. As a direct and proximate result of defendants' unlawful conduct, plaintiffs suffered emotional distress, humiliation, fear, anxiety, loss of dignity, loss of workplace safety, career harm, and other damages.

COUNT VII

Hostile Work Environment Under the New York City Human Rights Law Against Defendant THE CITY OF NEW YORK, and Against Defendants TISCH and MORAN for Aiding and Abetting

1029. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

1030. Plaintiffs were entitled to work in an environment free from discrimination, sexual harassment, retaliation, intimidation, and abuse of command authority.

1031. Defendant THE CITY OF NEW YORK, acting through the NYPD, defendant MORAN, defendant TISCH, and other NYPD officials, supervisors, agents, and employees, subjected plaintiffs AVILA, SOSA, and ROMERO to a hostile work environment because of their sex, gender, race, ethnicity, and national origin.

1032. The hostile work environment included sexualized command access, personal-boundary violations, coercive social-event pressure, public humiliation, unwanted physical contact, ethnicized and national-origin-based degradation, dress- and appearance-based comments, paperwork threats, probationary vulnerability, retaliatory intimidation, and the use of command authority to make resistance professionally dangerous.

1033. As to AVILA, the hostile work environment included private command access, sexualized comments, pressure to attend Department-related events, sexualized photography demands, ethnic and national-origin degradation, retaliatory threats, sick-leave scrutiny, and transfer from the 46th Precinct to the 47th Precinct after protected activity.

1034. As to SOSA, the hostile work environment included private command access, UF49 threats, pressure to attend Department-related events, unwanted physical contact, public

sexual humiliation at the NYDO Tipico party, an unfavorable UF49, Risk Management involvement, and probationary consequences after she rejected, avoided, or failed to submit to MORAN's overt sexual advances.

1035. As to ROMERO, the hostile work environment included a command-level bet used to create personal access, repeated "you owe me" comments, obtaining her phone number through command pressure, pressure to attend Department-related social events, unwanted touching of her cheek, dress-inspection comments, repeated pressure to dance, sexualized comments that she was "worth getting a divorce for" and "worth my pension," and MORAN's post-event apology after being told he was "out of control."

1036. Under the New York City Human Rights Law's liberal construction, plaintiffs were treated less well and subjected to inferior terms, conditions, and privileges of employment because of their protected characteristics.

1037. The hostile work environment must be assessed under the totality of the circumstances, including the sexually compromised 46th Precinct atmosphere, defendants' notice of that atmosphere, MORAN's command rank, plaintiffs' subordinate status, SOSA's probationary vulnerability, ROMERO's vulnerability as a subordinate Police Officer pressured through Department-related off-duty events, and the Department's failure to provide prompt and effective protection.

1038. Defendant THE CITY OF NEW YORK is liable because MORAN used NYPD authority, access, rank, workplace power, Department-related events, ethnic-affinity settings, personnel processes, and supervisory influence to create and maintain the hostile work environment.

1039. Defendant MORAN is liable because he directly created, participated in, and escalated the hostile work environment, and aided, abetted, incited, compelled, or coerced the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1040. Defendant TISCH is liable because she selected, approved, assigned, retained, supervised, failed to supervise, ratified, or permitted MORAN to exercise command authority inside a command already known to be sexually compromised and unsafe for subordinate female members of service, including Latina, Dominican, Puerto Rican, and Ecuadorian members, and thereby aided, abetted, incited, compelled, or coerced the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1041. As a direct and proximate result of defendants' unlawful conduct, plaintiffs suffered emotional distress, humiliation, fear, anxiety, disgust, loss of dignity, loss of workplace safety, career harm, and other damages.

COUNT VIII

Retaliation Under the New York City Human Rights Law Against Defendant THE CITY OF NEW YORK, and Against Defendants TISCH and MORAN for Aiding and Abetting

1042. Plaintiffs repeat and reallege each preceding paragraph as if fully set forth herein.

1043. Plaintiffs engaged in protected activity under the New York City Human Rights Law by resisting, avoiding, opposing, declining, reporting, or refusing to submit to sexual harassment, discriminatory conduct, and hostile-work-environment conduct.

1044. Plaintiff AVILA engaged in protected activity when she resisted or avoided MORAN's sexualized and coercive conduct and when she reported MORAN to IAB and OEI.

1045. Plaintiff SOSA engaged in protected activity when she rejected, avoided, or failed to submit to MORAN's overt sexual advances and coercive sexualized conduct.

1046. Plaintiff ROMERO engaged in protected activity when she tried to avoid MORAN, declined his repeated requests to dance, attempted to move away from him during the NYDO Tipico party, and failed to submit willingly to his sexualized comments, unwanted touching, social-event pressure, and coercive “you owe me” demands.

1047. Defendants knew or should have known that plaintiffs engaged in protected activity.

1048. After AVILA engaged in protected activity, she was subjected to retaliatory treatment, including denial of an available Department vehicle, efforts by MORAN to reach her through other members, Absence Control scrutiny, retaliatory threats, and transfer from the 46th Precinct to the 47th Precinct.

1049. After SOSA engaged in protected activity, MORAN wrote, caused to be written, submitted, approved, relied upon, or caused Risk Management to receive an unfavorable UF49 concerning her in retaliation for her rejection of, avoidance of, or failure to submit to his overt sexual advances.

1050. SOSA’s probation was thereafter extended through or in connection with the UF49, Risk Management, and probationary process.

1051. After ROMERO resisted, declined, avoided, or failed to submit willingly to MORAN’s sexualized and coercive conduct, MORAN continued to pressure her, including by repeatedly telling her that she “owed” him, demanding that she and “her girls” attend a future all-white boat party, repeatedly pressuring her to dance after she declined, touching her cheek without consent, and making comments that she was “worth getting a divorce for” and “worth my pension.”

1052. Plaintiffs allege that MORAN's conduct toward ROMERO was retaliatory, coercive, and intimidation-based because he used his rank as commanding officer to make ordinary resistance feel professionally dangerous.

1053. Plaintiffs allege that MORAN's June 27, 2026 text message to ROMERO, apologizing after being told he was "out of control" and stating that he was sorry if he "crossed any lines," confirmed that MORAN knew or should have known that ROMERO had been subjected to boundary-crossing conduct.

1054. Defendants' retaliatory acts were reasonably likely to deter plaintiffs and other employees from opposing discrimination, sexual harassment, hostile work environment, or retaliation.

1055. Defendant THE CITY OF NEW YORK is liable because the retaliatory acts were committed through NYPD command authority, supervisory power, Department resources, personnel processes, Department-related events, workplace mechanisms, and the coercive power of MORAN's position as commanding officer.

1056. Defendant MORAN is liable because he directly participated in, caused, and escalated the retaliatory conduct, and aided, abetted, incited, compelled, or coerced the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1057. Defendant TISCH is liable because she selected, approved, assigned, retained, supervised, failed to supervise, ratified, or permitted MORAN to exercise command authority and failed to ensure prompt and effective protection after plaintiffs opposed, resisted, avoided, declined, or reported unlawful conduct, thereby aiding, abetting, inciting, compelling, or coercing the unlawful conduct within the meaning of Administrative Code § 8-107(6).

1058. As a direct and proximate result of defendants' unlawful retaliation, plaintiffs suffered emotional distress, humiliation, fear, anxiety, disgust, loss of dignity, loss of workplace safety, career harm, and other damages.

JURY TRIAL

1059. Plaintiffs OSMAIRYS A. AVILA, PAMELA SOSA, and BRITTANY N. ROMERO hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, OSMAIRYS A. AVILA, PAMELA SOSA, and BRITTANY N. ROMERO respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, and JUAN O. MORAN jointly and severally where permitted by law, as follows:

- a. Declaring that defendants violated plaintiffs' rights under the New York State Human Rights Law, Executive Law § 296;
- b. Declaring that defendants violated plaintiffs' rights under the New York City Human Rights Law, Administrative Code § 8-107;
- c. Awarding plaintiffs' compensatory damages in an amount to be determined at trial;
- d. Awarding plaintiffs' damages for emotional distress, humiliation, embarrassment, anxiety, fear, loss of dignity, loss of workplace safety, reputational harm, career harm, and other non-economic injuries in an amount to be determined at trial;

- e. Awarding plaintiffs back pay, front pay, lost wages, lost overtime, lost benefits, pension-related losses, and other economic damages where applicable and in an amount to be determined at trial;
- f. Awarding punitive damages against defendants TISCH and MORAN to the fullest extent permitted by the New York State Human Rights Law, the New York City Human Rights Law, and applicable law;
- g. Awarding plaintiffs' pre-judgment interest and post-judgment interest to the fullest extent permitted by law;
- h. Awarding plaintiffs' reasonable attorneys' fees, costs, expenses, and disbursements pursuant to the New York State Human Rights Law, the New York City Human Rights Law, and any other applicable law;
- i. Entering injunctive relief requiring defendants to cease and desist from engaging in sexual harassment, discrimination, hostile-work-environment conduct, retaliation, aiding and abetting, and any other unlawful employment practices against plaintiffs;
- j. Entering injunctive relief requiring defendants to remove, correct, expunge, seal, or otherwise neutralize any retaliatory, discriminatory, or unsupported personnel documentation, UF49 documentation, Risk Management documentation, probationary documentation, sick-leave scrutiny documentation, transfer-related documentation, or other records arising from or connected to the unlawful conduct alleged herein;
- k. Entering injunctive relief requiring defendants to restore plaintiffs to the terms, conditions, privileges, assignments, opportunities, command standing,

probationary status, and employment benefits they would have enjoyed absent defendants' unlawful conduct, to the extent practicable;

- l. Entering injunctive relief prohibiting defendants and their agents, employees, supervisors, executives, officers, representatives, and all persons acting in concert with them from retaliating against plaintiffs for filing, prosecuting, participating in, or supporting this action;
- m. Awarding such other and further legal, equitable, declaratory, and injunctive relief as this Court deems just, proper, and equitable.

Dated: July 9, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiffs OSMAIRYS A. AVILA,
PAMELA SOSA and BRITTANY N. ROMERO

THE SANDERS FIRM, P.C.
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ATTORNEY VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

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

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

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

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

Dated: July 9, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiffs OSMAIRYS A. AVILA,
PAMELA SOSA and BRITTANY N. ROMERO

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

INDEX NO.:

OSMAIRYS A. AVILA, PAMELA SOSA and BRITTANY N.
ROMERO

Plaintiffs,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH and JUAN
O. MORAN

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiffs OSMAIRYS A. AVILA,
PAMELA SOSA, and BRITTANY N. ROMERO

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