

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
DELINDA N. GIRALDO

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK, JESSICA S. TISCH, JEFFREY
B. MADDREY, EDWARD A. THOMPSON, JOSEPH A.
DIBARTOLOMEO, ELTON D. COHN, ALEXANDRU O.
ANGHEL, ANTHONY A. BRUNO, FERNANDO
DOMINGUEZ, ATICKUL ISLAM, MOHAMMAD
ABDELFATTAH, and ELIZABETH OLIVERO

Defendants
-----X

To the Defendants named above:

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

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

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

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

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

Plaintiff designates Bronx County as the place of trial because a substantial part of the
acts and omissions giving rise to plaintiff's claims occurred in Bronx County, including the most

egregious aspects of the discriminatory, sexually hostile, retaliatory, and related conduct alleged in the Verified Complaint.

The unlawful course of conduct alleged herein was continuing in nature and had ongoing effects upon plaintiff in Bronx County, Kings County, New York County, and Westchester County.

Venue is further proper in Bronx County because significant acts and omissions by the individually named defendants occurred there, and because the continuing discriminatory, sexually hostile, retaliatory, supervisory, and employment-related conduct alleged herein was carried out through, reinforced by, and continued to affect plaintiff across multiple New York counties, with the most serious and consequential events occurring in Bronx County.

Defendant THE CITY OF NEW YORK is a municipal defendant, and the claims against it arise from the acts and omissions of New York City Police Department officials, supervisors, officers, and employees acting within the scope of their employment and authority.

Defendants JESSICA S. TISCH, JEFFREY B. MADDREY, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, ELTON D. COHN, ALEXANDRU O. ANGHEL, ANTHONY A. BRUNO, FERNANDO DOMINGUEZ, ATICKUL ISLAM, MOHAMMAD ABDELFATTAH, and ELIZABETH OLIVERO are New York City Police Department executives, supervisors, officers, or employees whose challenged conduct arose from their official duties, supervisory authority, employment responsibilities, or interactions with plaintiff.

Accordingly, plaintiff elects Bronx County as the place of trial.

Dated: August 20, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
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Defendants
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Plaintiff DELINDA N. GIRALDO by her attorney THE SANDERS FIRM, P.C.,
complaining of defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFFREY B.
MADDREY, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, ELTON D. COHN,
ALEXANDRU O. ANGHEL, ANTHONY A. BRUNO, FERNANDO DOMINGUEZ, ATICKUL
ISLAM, MOHAMMAD ABDELFATTAH, and ELIZABETH OLIVERO, alleges as follows:

INTRODUCTION

This action arises from a sexually charged and retaliatory culture within the New York City Police Department in which female officers—and Latina female officers in particular—are subjected to unwanted sexual attention, sexualized commentary, objectification, invasive touching, unequal treatment, and retaliation when they reject, resist, or complain about such conduct.

Plaintiff DELINDA N. GIRALDO, a Colombian Latina Police Officer with more than twelve years of service, experienced that culture first at Police Service Area 3 (“PSA 3”), where

supervisory rank was repeatedly used to create access to her, test sexual boundaries, force unwanted familiarity, sexualize her, and punish her when she refused to reciprocate.

Defendant ELTON D. COHN, plaintiff's commanding officer, directed unwanted sexual attention toward plaintiff shortly after assuming command. Plaintiff rejected him, deliberately distanced herself, and refused to encourage the attention. Plaintiff alleges that what followed was not neutral personnel administration. Her assignments changed, her disciplinary affairs became public workplace conversation, she was treated differently from comparable officers, and she became the target of increasingly adverse command decisions after rejecting COHN's sexual attention.

When plaintiff was reassigned to High-Tech under defendant FERNANDO DOMINGUEZ, the same pattern reappeared in another form. DOMINGUEZ repeatedly created supervisory proximity, selected plaintiff to drive him, imposed intimate and graphic sexual conversations upon her, sought her attention and approval, and openly sexualized her before other officers. Plaintiff refused to reciprocate. His conduct then became hot and cold: pursuit became withdrawal, attention became antagonism, and sexual interest became professional hostility.

Other officers saw the pattern. They told plaintiff DOMINGUEZ liked her, was acting strangely around her, was fixated upon her, and was behaving like a boy who "picks on the girl he likes." When plaintiff continued refusing the unwanted attention, DOMINGUEZ discussed her discipline with coworkers, manufactured workplace conflicts, spread false narratives about her work, attempted to use body-worn-camera footage to humiliate her, and attacked her professional reputation.

At the same time, defendants ANTHONY A. BRUNO and ATICKUL ISLAM subjected plaintiff to selective disciplinary scrutiny over matters for which other officers were not treated similarly. Sergeant Alex Ramos contemporaneously told plaintiff that she was being targeted because she had “shut [COHN] down” and warned that COHN’s “minion[s]” would look for opportunities to “hammer” her.

The sexually hostile environment extended beyond plaintiff’s immediate treatment.

Plaintiff was exposed at PSA 3 to the coerced sexual video of then-Lieutenant Quathisha Epps, which had been provided only to then-Chief of Department JEFFREY B. MADDREY within the context of Epps’s allegations that MADDREY used his extraordinary command authority to subject her to coercive sexual conduct, including rape and sodomy inside NYPD Headquarters and the Office of the Chief of Department.

Plaintiff alleges that MADDREY, as the sole recipient of that video before it entered NYPD circulation, caused, enabled, permitted, participated in, or was the source of its dissemination to others.

By the time the video reached PSA 3, it had become workplace sexual fodder. Defendants ALEXANDRU O. ANGHEL and MOHAMMAD ABDELFATTAH openly discussed it, called Epps a “fucking liar” and “fucking whore,” mocked her sexual-harassment allegations, and used intimate material arising from alleged coercive sexual abuse to attack her professional credibility.

For plaintiff, that episode was not collateral gossip. It demonstrated what the NYPD workplace could do to a woman who became associated with sexual misconduct by powerful male officials: her body could circulate, her allegations could become entertainment, and she could become the target instead of the conduct she reported.

Plaintiff alleges that THE CITY OF NEW YORK, through Police Commissioner JESSICA S. TISCH, Internal Affairs Bureau Chief EDWARD A. THOMPSON, and Internal Affairs Bureau Executive Officer JOSEPH A. DIBARTOLOMEO, failed to stop the continued circulation, display, and degrading workplace use of Epps's coerced sexual video and failed to confront the broader institutional culture that permitted sexually explicit material involving female members of service to become workplace entertainment.

Plaintiff further alleges that THOMPSON and DIBARTOLOMEO were themselves desensitized to inappropriate relationships between supervisory personnel and subordinate female officers, including Latina female officers, because of their own histories of inappropriate relationships with subordinate women, contributing to an institutional tolerance of sexual boundary violations involving rank.

The Epps video reinforced the same lesson plaintiff was learning through her own treatment: male command authority could create sexual access, female resistance could produce retaliation, and the Department's internal systems did not reliably protect the woman who complained.

Plaintiff eventually disclosed that she believed she had been removed from High-Tech because she refused to reciprocate DOMINGUEZ's sexual advances. The resulting OEEA matter was closed without meaningful investigation.

Plaintiff was then removed from High-Tech and assigned to the midnight tour, where she remained for approximately one year. Plaintiff alleges that the movement was imposed because she rejected unwanted sexual attention from COHN and DOMINGUEZ and refused to participate in the sexually charged frat-boy culture surrounding them.

The prolonged midnight assignment caused severe sleep disruption, anxiety, exhaustion, counseling needs, prescription sleep-medication use, housing instability, and serious consideration of abandoning an NYPD career in which plaintiff had invested more than twelve years.

Plaintiff ultimately sought transfer from PSA 3 because she wanted to escape the sexualized, retaliatory, and professionally corrosive environment that had developed around her.

On or about May 15, 2026, plaintiff transferred to PSA 7 hoping to leave that environment behind.

She did not.

On August 19, 2026, defendant Detective ELIZABETH OLIVERO approached plaintiff inside the common desk area at PSA 7 and intentionally grabbed plaintiff's left buttock without consent or legitimate purpose. OLIVERO laughed, admitted the touching, followed plaintiff outside, and acknowledged that she believed plaintiff might react physically because of what OLIVERO had done.

When plaintiff immediately disclosed the incident to Police Officer NERI, NERI responded, in substance, that "that's what [OLIVERO] does," that "no one says anything," and that "that's just how she is."

Those statements confirmed for plaintiff that the institutional problem she had tried to escape at PSA 3 was not confined to that command.

At PSA 3, sexual boundaries were crossed through grooming, unwanted attention, forced sexual conversation, objectification, retaliation, and selective discipline.

At PSA 7, the boundary violation became physical.

Plaintiff alleges that OLIVERO's grabbing of her buttock constituted Forcible Touching under Penal Law § 130.52(1) and a crime of violence motivated by gender actionable under the New York City Victims of Gender-Motivated Violence Protection Law, Administrative Code §§ 10-1101 through 10-1107.

This action therefore concerns more than isolated vulgar comments, discrete personnel decisions, or one unwanted touching.

It concerns an institutional environment in which sexualized access to female officers was normalized, rejection was punished, intimate material arising from alleged gender-motivated sexual violence became workplace fodder, internal accountability mechanisms failed to stop the conduct, and plaintiff experienced the consequences across two separate NYPD commands.

Plaintiff brings this action under the New York State Human Rights Law, the New York City Human Rights Law, the New York City Victims of Gender-Motivated Violence Protection Law, and other applicable law to recover for the discrimination, sexually hostile work environment, retaliation, aiding and abetting, gender-motivated violence, and related injuries caused by defendants' conduct.

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 plaintiff seeks legal and equitable relief for violations of the New York State Human Rights Law, Executive Law § 296, the New York City Human Rights Law, Administrative Code § 8-107 et seq., and the New York City Victims of Gender-Motivated Violence Protection Law, Administrative Code §§ 10-1101 through 10-1107.

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,

operates the New York City Police Department (“NYPD”), employed plaintiff and the individually named NYPD defendants at all relevant times, and is responsible for the acts and omissions of its managerial and supervisory personnel as provided by applicable law.

3. This Court has jurisdiction over defendants JESSICA S. TISCH, JEFFREY B. MADDREY, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, ELTON D. COHN, ALEXANDRU O. ANGHEL, ANTHONY A. BRUNO, FERNANDO DOMINGUEZ, ATICKUL ISLAM, MOHAMMAD ABDELFAHATTAH, and ELIZABETH OLIVERO because, at all relevant times, they were NYPD commissioners, chiefs, executive officers, supervisors, detectives, police officers, or employees who committed, participated in, aided, abetted, enabled, acquiesced in, failed to correct, or otherwise contributed to the discriminatory, sexually hostile, retaliatory, and gender-motivated conduct alleged herein.

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

5. Plaintiff designates Bronx County as the place of trial because a substantial part of the acts and omissions giving rise to plaintiff’s claims occurred in Bronx County, and the ongoing and most egregious aspects of the discriminatory, sexually hostile, retaliatory, and gender-motivated conduct alleged herein occurred or had effect there.

6. The unlawful course of conduct alleged herein occurred or had continuing effects upon plaintiff in New York County, Kings County, Bronx County, and Westchester County, with the most egregious portion of the events occurring in Bronx County.

7. The discriminatory, sexually hostile, retaliatory, and gender-motivated conduct alleged herein falls within the territorial scope of the New York State Human Rights Law and, where applicable, the New York City Human Rights Law and the New York City Victims of Gender-Motivated Violence Protection Law because substantial portions of the alleged conduct

occurred within the City of New York, including the conduct at PSA 3, the dissemination and workplace use of Lieutenant Epps's coerced sexual video within the NYPD, the conduct at PSA 7, and the resulting impact upon plaintiff in Bronx County and elsewhere within the City of New York.

8. This Court further has jurisdiction over the individual defendants because the conduct attributed to them occurred in New York, was undertaken through their NYPD employment or command authority, or caused discriminatory, sexually hostile, retaliatory, or gender-motivated effects upon plaintiff within New York City.

PROCEDURAL REQUIREMENTS

9. Plaintiff has commenced this action within the applicable statutes of limitations.

10. Plaintiff's employment discrimination, hostile work environment, retaliation, and aiding-and-abetting 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.

11. Plaintiff additionally asserts a cause of action under the New York City Victims of Gender-Motivated Violence Protection Law, Administrative Code §§ 10-1101 through 10-1107, arising from the alleged crime of violence motivated by gender committed against her.

12. Plaintiff's claims under the New York State Human Rights Law and the New York City Human Rights Law have been commenced within the applicable limitations' periods.

13. The discriminatory, sexually hostile, and retaliatory conduct alleged herein includes acts occurring within three years of the commencement of this action, together with allegations concerning the continuing workplace context, background, and course of conduct relevant to plaintiff's timely claims.

14. Plaintiff's claim under the New York City Victims of Gender-Motivated Violence Protection Law is independently timely pursuant to Administrative Code § 10-1105(a), which provides a seven-year limitations period measured from the alleged crime of violence motivated by gender.

15. The August 19, 2026 conducts alleged against defendant OLIVERO occurred within the applicable seven-year limitations period and gives rise to plaintiff's claim under Administrative Code § 10-1104.

16. The New York City Victims of Gender-Motivated Violence Protection Law does not require a prior criminal complaint, prosecution, or conviction as a prerequisite to maintaining a civil action under the statute. Administrative Code § 10-1105(c).

17. No Notice of Claim is required as a condition precedent to plaintiff's claims brought pursuant to the New York State Human Rights Law and the New York City Human Rights Law under General Municipal Law §§ 50-e or 50-i.

18. To the extent any defendant contends that a notice-of-claim requirement applies to any separate claim alleged herein, plaintiff expressly reserves all arguments that such requirement is inapplicable, has been satisfied, has been waived, or is otherwise not a bar to the statutory causes of action asserted in this Verified Complaint.

19. Plaintiff has satisfied all conditions precedent necessary to maintain this action, or such conditions have been waived, excused, satisfied, or are inapplicable.

20. Plaintiff demands a trial by jury on all issues so triable.

PLAINTIFF

21. Plaintiff DELINDA N. GIRALDO (“plaintiff”) is a Colombian Latina woman and, at all relevant times, was employed by defendant THE CITY OF NEW YORK as a Police Officer with the New York City Police Department (“NYPD”).

22. Plaintiff has served the NYPD for more than twelve years and, during the period relevant to this action, was assigned to multiple NYPD commands, including Police Service Area 3 (“PSA 3”) and Police Service Area 7 (“PSA 7”).

23. While assigned to PSA 3, plaintiff was subject to the command, supervisory, disciplinary, and operational authority of several of the individually named defendants and alleges that she was subjected to unwanted sexual attention, adult sexual-grooming behavior, forced familiarity, sexually explicit and degrading workplace conduct, objectification, selective discipline, disparate treatment, unfavorable assignments, retaliatory scrutiny, public humiliation, and other adverse changes in the terms and conditions of her employment.

24. Plaintiff alleges that supervisory personnel used rank and workplace access to test sexual boundaries, create repeated proximity, introduce intimate and sexually explicit subject matter, seek plaintiff’s attention and approval, and then shift from attention to coldness, hostility, scrutiny, discipline, and adverse assignments when plaintiff refused to reciprocate or participate in the sexualized workplace dynamic.

25. Plaintiff further alleges that, after rejecting or refusing to reciprocate unwanted sexual attention from COHN and DOMINGUEZ, she was subjected to escalating scrutiny, Command Disciplines, targeted body-worn-camera review, changes in assignment and tour, public discussion of disciplinary matters, manufactured workplace problems, professional undermining, removal from High Tech, and approximately one year on the midnight tour.

26. Plaintiff alleges that the sexually charged workplace environment she encountered at PSA 3 also included the circulation and workplace use of Lieutenant Quathisha Epps's "coerced" sexual video, degrading sexual commentary concerning Epps and other female members of service, and conduct that reinforced plaintiff's belief that female officers who rejected, resisted, or complained about sexual misconduct could themselves become the subject of ridicule, sexual humiliation, attacks upon credibility, scrutiny, and retaliation.

27. Plaintiff alleges that the continued circulation and workplace use of Epps's "coerced" sexual video, and the failure of THE CITY OF NEW YORK through JESSICA S. TISCH, EDWARD A. THOMPSON, and JOSEPH A. DIBARTOLOMEO to stop its use as workplace sexual fodder, materially reinforced the sexually hostile and retaliatory environment experienced by plaintiff and contributed to her distrust of the NYPD's internal reporting and investigative processes.

28. On or about May 15, 2026, plaintiff transferred from PSA 3 to PSA 7 after the PSA 3 environment had become professionally and personally intolerable. Plaintiff carried with her the lingering effects of the sexual grooming, retaliation, prolonged midnight assignment, sleep disruption, anxiety, counseling needs, housing instability, and diminished trust in the Department's willingness to protect female officers from sexual misconduct.

29. While assigned to PSA 7, plaintiff alleges that on August 19, 2026, defendant ELIZABETH OLIVERO intentionally grabbed plaintiff's left buttock in a common area near the desk officer location, laughed about the contact, acknowledged that she had intentionally touched plaintiff, and followed plaintiff toward the parking area thereafter.

30. Plaintiff alleges that OLIVERO's conduct constituted an unwanted sexual touching and a crime of violence motivated by gender within the meaning of the New York City

Victims of Gender-Motivated Violence Protection Law, and that the workplace response—including the statement that “that’s what she does” and that “no one says anything”—reinforced the same normalization of sexual boundary violations plaintiff had already experienced at PSA 3.

31. Plaintiff alleges that the conduct she experienced at PSA 3 and PSA 7 occurred within a broader sexually charged NYPD workplace culture in which Latina female officers, in particular, are subjected to unwanted sexual attention, sexualized commentary, objectification, invasive touching, unequal treatment, retaliation, and institutional indifference when they reject, resist, or complain about such conduct.

DEFENDANTS¹

32. Defendant THE CITY OF NEW YORK (“CITY”) is a municipal corporation organized and existing under the laws of the State of New York and, at all relevant times, operated, maintained, controlled, supervised, and administered the NYPD.

33. At all relevant times, the CITY employed plaintiff and the individually named NYPD defendants and exercised authority over NYPD personnel, assignments, discipline, supervision, workplace policies, investigations, equal-employment practices, complaint procedures, and corrective action.

34. Defendant JESSICA S. TISCH (“TISCH”) was, at all relevant times applicable to the allegations against her, the Police Commissioner of the NYPD and exercised ultimate command authority over Department operations, discipline, investigations, Internal Affairs, and workplace standards.

¹ Each individually named defendant is sued in his or her individual capacity and, to the extent applicable to the claims and relief asserted, in his or her official capacity as an employee, supervisor, executive, or officer of the New York City Police Department.

35. Plaintiff alleges that TISCH failed to take effective action to stop the circulation and degrading workplace use of Lieutenant Quathisha Epps's "coerced" sexual video and failed to protect female employees, including plaintiff, from the sexually hostile environment reinforced by its continued circulation.

36. Defendant JEFFREY B. MADDREY ("MADDREY") served as Chief of Department and was the sole recipient of Epps's "coerced" sexual video before it entered NYPD circulation. Plaintiff alleges that MADDREY caused, enabled, permitted, participated in, or was the source of its dissemination to other NYPD personnel.

37. Defendant EDWARD A. THOMPSON ("THOMPSON") was Chief of the NYPD Internal Affairs Bureau and exercised substantial authority over investigations of serious misconduct by members of service.

38. Defendant JOSEPH A. DIBARTOLOMEO ("DIBARTOLOMEO") was Executive Officer of the Internal Affairs Bureau and exercised substantial authority over IAB investigative operations and case supervision.

39. Plaintiff alleges that THOMPSON and DIBARTOLOMEO failed to cause an effective investigation or corrective response concerning the dissemination and workplace use of Epps's "coerced" sexual video and were desensitized to inappropriate supervisory relationships with subordinate female officers, including Latina female officers, because of their own histories of such inappropriate relationships.

40. Defendant ELTON D. COHN ("COHN") served in a command and supervisory capacity at PSA 3, including as commanding officer, and exercised authority over plaintiff's assignments, discipline, tour placement, supervision, and working conditions.

41. Plaintiff alleges that COHN subjected her to unwanted sexual attention and thereafter participated in discriminatory, sexually hostile, selectively disciplinary, and retaliatory treatment after plaintiff rejected and refused to reciprocate that attention.

42. Defendant ALEXANDRU O. ANGHEL (“ANGHEL”) was an NYPD Lieutenant exercising supervisory authority at PSA 3.

43. Plaintiff alleges that ANGHEL contributed to the sexually hostile workplace environment, including through degrading commentary concerning Epps, discussion of her “coerced” sexual video, ridicule of sexual-harassment allegations, and participation in the frat-boy atmosphere alleged herein.

44. Defendant ANTHONY A. BRUNO (“BRUNO”) was an NYPD Lieutenant serving in an Integrity Control or related supervisory capacity at PSA 3 and exercised disciplinary authority over plaintiff.

45. Plaintiff alleges that BRUNO participated in selective disciplinary treatment directed toward plaintiff after she rejected COHN’s unwanted sexual attention.

46. Defendant FERNANDO DOMINGUEZ (“DOMINGUEZ”) was an NYPD Sergeant who directly supervised plaintiff in the High-Tech Unit at PSA 3.

47. Plaintiff alleges that DOMINGUEZ subjected her to adult sexual-grooming behavior, unwanted sexualized and intimate conduct, objectification, and a hot-and-cold pattern of attention and hostility, and thereafter retaliated when plaintiff refused to reciprocate his attention.

48. Defendant ATICKUL ISLAM (“ISLAM”) was an NYPD Sergeant serving in a compliance-related supervisory capacity at PSA 3.

49. Plaintiff alleges that ISLAM participated in selective disciplinary scrutiny directed toward plaintiff, including body-worn-camera review and discipline not applied uniformly to other officers.

50. Defendant MOHAMMAD ABDELFAHATTAH (“ABDELFAHATTAH”) was an NYPD Police Officer assigned to or operating within PSA 3.

51. Plaintiff alleges that ABDELFAHATTAH contributed to the sexually hostile workplace environment through degrading commentary concerning Epps, discussion of her “coerced” sexual video, and ridicule of her sexual-harassment allegations.

52. Defendant ELIZABETH OLIVERO (“OLIVERO”) was an NYPD Detective assigned to PSA 7. Plaintiff alleges that OLIVERO intentionally grabbed plaintiff’s left buttock on August 19, 2026, conduct constituting Forcible Touching under Penal Law § 130.52 and a crime of violence motivated by gender under Administrative Code §§ 10-1103 and 10-1104.

53. Each individually named defendant personally participated in, aided, abetted, enabled, directed, acquiesced in, failed to correct, or otherwise contributed to the conduct attributed to that defendant herein.

BACKGROUND

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

54. Adult sexual grooming provides a useful framework for understanding how sexual harassment can develop within hierarchical workplaces where one person possesses institutional, supervisory, disciplinary, or professional authority over another. The concept is particularly relevant where the challenged conduct does not begin with an overt sexual proposition or physical assault, but instead develops incrementally through repeated boundary

testing, increased personal access, sexualized conversation, manipulation of professional relationships, and escalating efforts to normalize inappropriate intimacy.

55. As used in this Verified Complaint, “adult sexual grooming” is not pleaded as a medical diagnosis, psychological disorder, or independent cause of action. It is a descriptive framework for evaluating patterns of conduct that, when viewed individually, may appear ambiguous or disconnected, but when considered together may reveal an escalating effort to erode professional boundaries and create conditions favorable to sexual access, control, or exploitation.

56. Adult sexual grooming commonly develops through incremental conduct rather than a single event. The person engaging in the conduct may initially test whether sexualized comments, personal disclosures, physical proximity, appearance-based remarks, flirtation, private communications, or other boundary-crossing behavior will be tolerated. The reaction to those initial acts may then inform whether the conduct escalates, retreats temporarily, changes form, or becomes coercive or retaliatory.

57. In a workplace governed by rank and command authority, the analysis cannot be divorced from the power relationship between the participants. A supervisor or commanding officer may possess authority over assignments, schedules, tours, regular days off, evaluations, discipline, overtime, specialized positions, transfers, recommendations, workplace reputation, and access to professional opportunities. That institutional authority can materially affect the subordinate employee’s ability to reject unwanted conduct freely and can magnify the consequences of resistance.

58. The grooming process may also involve creating repeated or unnecessary proximity. A supervisor may seek recurring opportunities for private interaction, isolate an

employee from coworkers, arrange repeated one-on-one assignments, introduce increasingly personal subjects into professional conversations, or otherwise use ordinary workplace authority to create access that the subordinate employee cannot readily avoid without appearing insubordinate or uncooperative.

59. Sexualized communication may similarly be introduced gradually. Conversations that initially appear personal or informal can progress into discussions concerning sexual relationships, sexual experiences, intimate anatomy, physical appearance, sexual preferences, or other subjects unrelated to legitimate workplace functions. Repetition can operate to normalize conduct that would have appeared plainly inappropriate if introduced at the outset.

60. Objectification is another component frequently associated with this process. An employee may increasingly be evaluated, discussed, or treated according to physical appearance or perceived sexual desirability rather than professional status. Sexualized commentary made directly to the employee or about the employee to coworkers can alter how that employee is perceived within the workplace and can undermine professional authority, dignity, and standing.

61. The reaction to rejection is particularly significant. Where sexualized attention is welcomed, tolerated, ignored, or resisted, subsequent conduct may provide evidence concerning the purpose and character of the earlier interactions. A material change from attention-seeking behavior to hostility, humiliation, heightened scrutiny, exclusion, discipline, unfavorable assignments, or professional undermining following rejection may demonstrate that the prior conduct was not merely social awkwardness or benign workplace familiarity.

62. Retaliatory conduct can therefore operate as part of the same pattern rather than as an entirely separate phenomenon. In a supervisory environment, the same authority that provided access to the subordinate employee may later be used to punish resistance. Discipline,

scheduling, assignment authority, performance scrutiny, workplace gossip, exclusion, or reputational attacks can become mechanisms through which rejected sexual attention is converted into professional consequences.

63. Normalization by coworkers and other supervisors can further sustain the environment. Sexualized remarks, sexually explicit discussions, comments about employees' bodies, rumors concerning sexual relationships, and ridicule of employees who complain can communicate that sexual boundary violations are tolerated and that reporting them carries social or professional risk. A workplace culture of silence can thereby reinforce the power of the individual engaging in the conduct.

64. The concept of adult sexual grooming does not require every recognized feature to appear in every case, nor does the presence of any single characteristic establish unlawful conduct. The significance lies in the cumulative pattern, the sequencing of events, the relative authority of the participants, the reaction to resistance, and the manner in which workplace power is used before, during, or after the sexualized conduct.

65. The following representative table identifies recurring features that may be relevant when evaluating adult sexual grooming in a hierarchical workplace. The table is illustrative and not exhaustive.

Representative NYPD Sexual-Harassment, Grooming, and Retaliation Matters

Matter	Representative Conduct	Institutional Relevance
<i>Castillo-Diaz v. City of New York, et al.</i> , Index No. 810271/2026E	Dominican female officer alleged sexual remarks, administrative removal, undesirable assignments, overtime scrutiny, absence-control measures, and pretextual discipline after prior sexual-harassment litigation.	Alleged sexualized treatment and administrative retaliation against a Latina officer following protected activity.
<i>Avila, Sosa & Romero v. City of New York, Tisch & Moran</i> , Index No. 813435/2026E	Three Latina officers alleged command-level grooming, boundary testing, unwanted touching, ethnic degradation, retaliatory vehicle denial, weaponized paperwork, absence-control visits, and threats.	Alleged use of command authority to sexualize Latina officers and impose consequences after resistance or complaints.
<i>N.T. v. City of New York & Jeremy Scheublin</i> , Index No. 804313/2026E	Female patrol officer alleged grooming and quid pro quo conduct escalating to on-duty sexual assault by a commanding officer, followed by retaliatory scheduling.	Alleged progression from supervisory grooming to physical sexual violence and retaliation.
<i>Lampley, et al. v. City of New York & Rojas</i> No. 1:14-cv-08832 SDNY	Three Latina female officers alleged groping, breast grabbing, genital exposure, sexually explicit videos, and retaliatory scheduling and assignments.	Multiple alleged victims subjected to sexualized supervisory misconduct and retaliation within one command.
<i>Balli v. City of New York</i> , Index No. 151199/2021	Guyanese female captain alleged sexualized comments, gender discrimination, and retaliatory internal investigations.	Alleged use of internal processes against a female executive after complaints of discrimination.
<i>Vasquez v. City of New York, et al.</i> , Index No. 306825/12	Latina female officer alleged explicit sexual misconduct by a supervising lieutenant followed by retaliation after resistance and complaints.	Alleged supervisory sexual misconduct followed by retaliation.
<i>Brucato v. City of New York, et al.</i> , No. 20-cv-01772	Female housing officer alleged repeated sexual propositions and lewd remarks by a supervisory lieutenant; OEI substantiated harassment.	Sexualized supervisory conduct and alleged retaliation within an NYPD Police Service Area.
<i>Weinbel v. City of New York, et al.</i> , No. 19-cv-06386	Female officer alleged years of sexual and racial harassment by a supervisory lieutenant concerning appearance, dating, and physical characteristics.	Intersection of sexualized and race-related supervisory harassment within an NYPD Police Service Area.

66. For purposes of this action, this framework provides a method for evaluating alleged sexualized conduct in its complete workplace context rather than artificially separating each interaction from the supervisory relationship, institutional authority, sequence of events, and subsequent consequences surrounding it. The application of this framework to the particular conduct alleged in this Verified Complaint is set forth in the sections that follow.

B. Police Service Area 3 — Sexual Grooming, Frat-Boy Culture, Rejection-Based Retaliation, and the Weaponization of Command Authority

67. Plaintiff's experience at Police Service Area 3 ("PSA 3") did not consist of unrelated sexual comments followed by unrelated personnel decisions. It developed inside a sexually charged, frat-boy command culture in which rank supplied access to female officers, sexual boundaries were treated casually, women's bodies and sexuality became workplace conversation, sexually explicit material involving female members of service circulated among officers, and women associated with sexual-harassment complaints could themselves become targets of ridicule and degradation.

68. Plaintiff DELINDA N. GIRALDO was a Colombian Latina female Police Officer required to function within that environment while the individuals directing unwanted sexual attention toward her possessed command and supervisory authority over her assignments, tours, discipline, daily work, workplace reputation, and professional opportunities.

69. The adult sexual-grooming framework described above played out through plaintiff's actual experience at PSA 3.

70. The conduct began with access and boundary testing.

71. It progressed through unwanted sexual attention, repeated proximity, forced familiarity, intimate and sexually explicit conversation, and objectification.

72. When plaintiff refused to reciprocate, the conduct became hot and cold.

73. Attention was followed by withdrawal.
74. Withdrawal was followed by renewed efforts to provoke plaintiff.
75. When plaintiff continued refusing to engage, personal attention turned into professional hostility.
76. The same rank that created access to plaintiff was then used to scrutinize, discipline, reassign, humiliate, and isolate her.
77. Plaintiff could reject unwanted sexual attention.
78. She could not remove the commanding officer from her chain of command.
79. She could refuse to flirt with a Sergeant.
80. She could not refuse every legitimate assignment that placed her in a vehicle with him.
81. She could distance herself personally.
82. She still had to report to work under the authority of the men whose attention she rejected.
83. That imbalance is what made the push-and-pull dynamic coercive.
84. Plaintiff's first experience with that dynamic involved defendant ELTON D. COHN.
85. On October 24, 2023, approximately three weeks after COHN assumed command of PSA 3, plaintiff attended a command barbecue in the precinct parking lot.
86. COHN attended in full dress uniform carrying a coffee mug containing an unknown substance.

87. Plaintiff observed COHN stumbling, acting loose and “loopy,” dancing awkwardly, behaving unusually, and attempting to insert himself into a video plaintiff was recording with Police Officer CHRISTOPHER E. FRANCIS.

88. COHN spilled the contents of his mug on himself while attempting to join plaintiff and FRANCIS.

89. COHN then moved directly into plaintiff’s personal space.

90. He leaned into plaintiff.

91. His lips touched her ear.

92. He lowered his voice into a sexual tone.

93. He made a sexually suggestive comment to her.

94. This was not an ordinary interaction between a commanding officer and a subordinate.

95. COHN was testing whether plaintiff would accept sexualized physical proximity and attention from the man who controlled her command.

96. Plaintiff immediately understood what he was doing.

97. She felt dirty.

98. She felt violated.

99. She felt disgusted.

100. She understood that COHN was looking at her sexually rather than professionally.

101. Plaintiff rejected him.

102. She did not flirt with COHN.

103. She did not encourage him.

104. She did not seek another personal interaction with him.

105. Plaintiff deliberately distanced herself from COHN, avoided unnecessary interaction and eye contact, and removed herself from group settings when he entered.

106. Plaintiff made clear through her conduct that his sexual attention was unwanted and would not be reciprocated.

107. COHN received the message.

108. What he did not lose was his authority over plaintiff.

109. The sexual approach cooled.

110. The command relationship remained.

111. For several months, plaintiff continued performing her Public Safety Team duties without an overt confrontation with COHN.

112. The temporary calm was part of the hot-and-cold experience.

113. COHN had tested the boundary.

114. Plaintiff had rejected him.

115. He withdrew the direct attention while retaining the power to affect plaintiff's professional life.

116. In March 2024, plaintiff received a Command Discipline concerning a minor administrative failure to remain logged into the RMP Axon camera system.

117. COHN thereafter discussed plaintiff's discipline publicly in a group setting and remarked that plaintiff could simply make up the docked hours through overtime.

118. Plaintiff's disciplinary affairs were no longer being treated as a private professional matter.

119. They were becoming material for command discussion.

120. The relationship had begun moving from unwanted sexual attention toward public scrutiny and professional exposure.

121. On February 28, 2025, COHN's command authority produced a materially greater consequence.

122. Plaintiff was removed from the Public Safety Team.

123. Public Safety was a proactive specialized assignment.

124. Plaintiff was reassigned to High-Tech, which she understood to be a rookie-level and lower-status assignment.

125. Plaintiff's tour changed from 1500–2335 hours to 1730–0205 hours.

126. Her regular days off changed from Fridays and Saturdays to Sundays and Mondays.

127. Other members of the Public Safety Team were given opportunities to move into Neighborhood Coordination Officer or Neighborhood Safety Team assignments.

128. Plaintiff was not.

129. Other officers received choices.

130. Plaintiff received the assignment selected for her.

131. Plaintiff learned that the decision to eliminate the Public Safety Team originated with COHN.

132. Plaintiff alleges that COHN caused or directed the unequal treatment of plaintiff in response to her rejection of his unwanted sexual attention and her continued refusal to make herself personally or sexually available to him.

133. Plaintiff's reassignment did not remove her from the sexualized culture.

134. It placed her under defendant FERNANDO DOMINGUEZ.

135. The grooming dynamic began again with a different supervisor.

136. On March 4, 2025, immediately after plaintiff began working in High Tech, Police Officer Keva Weaver warned her about DOMINGUEZ.

137. Weaver had previously worked with DOMINGUEZ.

138. Weaver told plaintiff that DOMINGUEZ did not like women and especially did not like strong Black women.

139. She told plaintiff to watch herself around him.

140. Plaintiff had barely entered the assignment before another female officer familiar with DOMINGUEZ was warning her that his treatment of women presented a problem.

141. DOMINGUEZ soon began demonstrating the degree of control he intended to exercise over plaintiff's working environment.

142. On March 6, 2025, plaintiff asked DOMINGUEZ for permission to take the following day off because she had made plans before her schedule was changed.

143. DOMINGUEZ approved the request.

144. Yet on March 7, while plaintiff was properly off pursuant to his approval, DOMINGUEZ appeared at roll call asking, "Where's Giraldo?" as though plaintiff had failed to report for duty.

145. Police Officer Brendan D. Arena reminded DOMINGUEZ that plaintiff had already told him she would be off.

146. DOMINGUEZ acted as though he only vaguely remembered and stated that a heads-up text would have been nice.

147. He never contacted plaintiff.

148. He did not need to.

149. He already knew where she was.

150. Plaintiff alleges that DOMINGUEZ privately knew the truth while publicly creating a different narrative about her.

151. It was an early example of the conduct that later became routine: plaintiff would know the facts, DOMINGUEZ would know the facts, and DOMINGUEZ would nevertheless tell or suggest something different to her coworkers.

152. The frat-boy atmosphere surrounding those supervisory relationships became unmistakable on March 10, 2025.

153. Plaintiff received through WhatsApp a video depicting then-Lieutenant Quathisha Epps completely nude and touching herself sexually on a beach.

154. The video was later unsent and erased from plaintiff's device.

155. Plaintiff learned that private electronic group chats involving PSA 3 personnel were being used to circulate or discuss the sexually explicit material.

156. Defendants ALEXANDRU O. ANGHEL and MOHAMMAD ABDELFATTAH openly discussed Epps and the video inside the Special Operations office in plaintiff's presence.

157. ANGHEL and ABDELFATTAH called Epps a "fucking liar."

158. They called her a "fucking whore."

159. They claimed she made the video "for Maddrey."

160. They mocked her prior sexual-harassment complaints.

161. They attacked her credibility.

162. They claimed that her complaints were motivated by having been caught stealing hours.

163. A female NYPD Lieutenant's naked body had become workplace content.

164. Her sexuality had become entertainment.
165. Her sexual-harassment complaints had become a basis for ridicule.
166. Her credibility and professional reputation were attacked together with her sexuality.
167. This was the frat-boy atmosphere plaintiff was required to work inside.
168. ANGHEL and ABDELFATTAH spoke openly in front of plaintiff because sexually degrading a female officer who had complained of harassment was treated as ordinary conversation.
169. The incident taught plaintiff what happened to women inside the Department when sexual misconduct became attached to their names.
170. The woman could become the target instead of the misconduct.
171. Her body could circulate.
172. Her complaints could become gossip.
173. Her motives could be attacked.
174. Her professional credibility could be destroyed in the same conversation.
175. This directly affected plaintiff's willingness to report what was happening to her.
176. She had already rejected COHN.
177. She was now watching another female officer be sexually degraded after becoming associated with harassment allegations.
178. Plaintiff understood that reporting sexual misconduct could make her more exposed, not less.
179. Police Officer Christopher Francis was also a participant in PSA 3-related group chats and later advised plaintiff on August 16, 2026 that those group chats remained active.

180. The participants were not all known to plaintiff and remain subject to discovery.

181. ANGHEL and ABDELFATTAH affirmatively participated in and reinforced the sexually hostile culture in which plaintiff was being required to make decisions about whether it was safe to complain.

182. Two days later, DOMINGUEZ moved from supervisory familiarity into graphic sexual boundary testing.

183. On March 12, 2025, plaintiff was assigned to drive DOMINGUEZ in an NYPD radio motor patrol vehicle.

184. Arena sat in the rear seat.

185. Without invitation, DOMINGUEZ began describing a woman with whom he had engaged in sexual intercourse.

186. He stated that the woman claimed to have been a virgin.

187. He told plaintiff that he knew the woman was lying because she had not bled during intercourse.

188. DOMINGUEZ discussed whether he had broken the woman's hymen.

189. He discussed vaginal anatomy.

190. He used vaginal bleeding as the basis for judging the woman's sexual history and credibility.

191. Plaintiff had never invited sexual conversation with DOMINGUEZ.

192. She had not flirted with him.

193. She had not asked about his sexual experiences.

194. She had not created a personal relationship with him.

195. DOMINGUEZ nevertheless used a compulsory work assignment to place plaintiff in a confined space and force explicit sexual subject matter into their supervisory relationship.

196. That was the grooming mechanism operating through rank.

197. The assignment supplied access.

198. The vehicle supplied privacy and confinement.

199. The sexual conversation tested plaintiff's boundary.

200. DOMINGUEZ could observe whether she would laugh, respond, reciprocate, or permit the relationship to become more intimate.

201. Plaintiff gave him nothing.

202. She froze.

203. She did not encourage him.

204. She did not participate.

205. She endured the conversation because she was at work, behind the wheel, and the person forcing the conversation upon her was her Sergeant.

206. Arena immediately recognized that DOMINGUEZ had crossed the line.

207. Afterward, Arena told plaintiff that he could not believe DOMINGUEZ had made those statements in front of her.

208. Arena stated that even he would not say something like that.

209. Arena then told plaintiff: "I think he likes you."

210. Arena explained that DOMINGUEZ was trying to gain plaintiff's approval, was "doing too much," was acting awkwardly, and was overcompensating.

211. The sexual-interest dynamic was therefore not something plaintiff invented after the fact.

212. A male eyewitness sitting in the vehicle saw it as it was happening.
213. Later that same day, DOMINGUEZ again forced intensely personal material into the relationship.
214. He described an episode in which he suffered explosive diarrhea while driving home from shopping outlets on Long Island.
215. He described losing control of his bowels.
216. He described the smell.
217. He described soiling himself.
218. He described throwing away his underwear and pants.
219. He described cleaning himself in a gas station and changing into newly purchased clothing.
220. Arena was also uncomfortable.
221. The episode was not sexual harassment standing alone.
222. It was nevertheless part of the boundary-eroding conduct plaintiff was experiencing from DOMINGUEZ.
223. He repeatedly imposed deeply private, intimate, bodily, and sexual subjects upon a female subordinate who had never sought personal familiarity with him.
224. Personal conversation became intimate.
225. Intimate conversation became graphic.
226. Graphic conversation became sexual.
227. DOMINGUEZ was attempting to normalize a level of familiarity plaintiff had never agreed to create.

228. Plaintiff remained trapped inside the supervisory relationship regardless of whether she wanted that intimacy.

229. Other officers continued independently to observe DOMINGUEZ's attraction to plaintiff.

230. On March 13, 2025, Police Officer Shania Hubbard told plaintiff that plaintiff intimidated DOMINGUEZ.

231. Hubbard told plaintiff that DOMINGUEZ liked her.

232. She stated that he did not know how to show it.

233. She described him as acting "weird" around plaintiff.

234. Hubbard's observation independently confirmed the same dynamic Arena had identified the day before.

235. During March and early April 2025, DOMINGUEZ repeatedly selected plaintiff to drive him.

236. Sometimes plaintiff drove him two or three times during a single week.

237. Other officers noticed the frequency.

238. DOMINGUEZ rotated drivers, but repeatedly returned to plaintiff.

239. Those assignments gave him recurring access to plaintiff in the same confined setting in which he had already forced sexual and intimate conversation upon her.

240. The repeated proximity was not insignificant.

241. DOMINGUEZ did not need to ask plaintiff for private meetings.

242. Rank gave him the ability to create them through work assignments.

243. Plaintiff remained professional.

244. She did not flirt with him.

- 245. She did not become playful with him.
- 246. She did not encourage him.
- 247. She did not give him the personal approval Arena believed he was seeking.
- 248. The “hot” phase therefore failed.
- 249. DOMINGUEZ had obtained access.
- 250. He had created familiarity.
- 251. He had introduced intimate conversation.
- 252. He had escalated into explicit sexual conversation.
- 253. Plaintiff still refused him.
- 254. The temperature changed.
- 255. DOMINGUEZ became cold toward plaintiff directly.
- 256. He stopped regularly using her as his driver.
- 257. He reduced direct engagement.
- 258. He avoided eye contact.
- 259. But he did not stop being preoccupied with plaintiff.
- 260. Instead, the attention moved behind her back and into her professional life.
- 261. The pursuit became punishment.
- 262. DOMINGUEZ began discussing plaintiff’s disciplinary matters with other officers.
- 263. He began creating negative narratives about plaintiff’s work.
- 264. He began manufacturing supposed workplace conflicts.
- 265. He attempted to embarrass plaintiff publicly.

266. He increasingly communicated about plaintiff through coworkers rather than dealing with her professionally and directly.

267. Plaintiff alleges that DOMINGUEZ's hot-and-cold behavior reflected the failure of the grooming effort: when plaintiff refused to reward unwanted sexual attention with personal access or approval, DOMINGUEZ converted his supervisory authority into hostility and professional retaliation.

268. At the same time, the disciplinary machinery of PSA 3 tightened around plaintiff.

269. On March 26, 2025, defendant ANTHONY A. BRUNO, the Integrity Control Lieutenant, issued plaintiff two Command Disciplines.

270. One concerned plaintiff's winter knit cap.

271. The other concerned plaintiff's hair allegedly reaching her collar.

272. Plaintiff's hair had been tucked inside her shirt and duty jacket.

273. Multiple other officers were wearing winter knit caps.

274. COHN himself was wearing one.

275. Plaintiff was disciplined.

276. Police Officer Brittany Brown appeared at roll call with long dreadlocks decorated with jewelry and seashells.

277. Brown specifically asked BRUNO whether her hair violated Department regulations and whether she needed to change it.

278. BRUNO told Brown that her hair was fine.

279. Police Officer Devin Lopez witnessed the exchange.

280. Plaintiff was disciplined.

281. Brown was not.

282. Sergeant Ramos immediately recognized the disparity.

283. Ramos messaged plaintiff that what was happening was “fucking crazy.”

284. He told plaintiff that he had seen numerous officers with their hair down.

285. Ramos then stated directly: “Now he is targeting.”

286. Ramos told plaintiff that the targeting was occurring “out of resentment” because plaintiff had “shut [COHN] down.”

287. Ramos warned plaintiff that any violation observed by COHN’s “minion[s]” would be used to “hammer” her.

288. The connection between plaintiff’s sexual rejection and the disciplinary retaliation was therefore not merely plaintiff’s private belief.

289. Another NYPD supervisor contemporaneously identified the same connection.

290. Plaintiff alleges that BRUNO’s selective enforcement of appearance rules formed part of the retaliatory command response to plaintiff’s rejection of COHN’s unwanted sexual attention.

291. The following day, March 27, 2025, defendant ATICKUL ISLAM imposed another Command Discipline.

292. This time the subject was plaintiff’s body-worn-camera activation.

293. Plaintiff had powered her camera off to use the restroom and preserve her privacy.

294. When she realized the camera remained off, she immediately reactivated it.

295. The underlying event involved a routine 311 parking complaint.

296. There was no complainant or witness present.

297. Late activations and early deactivations occurred among officers without uniform discipline.

298. ANGHEL had previously questioned why only certain officers' body-worn-camera footage was repeatedly reviewed.

299. ISLAM responded that supervisors did not have time to review everyone's footage.

300. That admission exposed the selective nature of the process.

301. PSA 3 was not reviewing everyone.

302. Someone was selecting whose footage would receive scrutiny.

303. Plaintiff was one of the officers selected.

304. Within approximately twenty-four hours of BRUNO issuing two Command Disciplines, ISLAM imposed another.

305. Plaintiff alleges that ISLAM's discipline was part of the same targeted scrutiny imposed after she rejected unwanted sexual attention and refused to conform to the sexually charged workplace culture at PSA 3.

306. The contrast was stark.

307. Supervisors and officers could openly degrade a female Lieutenant and discuss sexually explicit material inside the command.

308. Plaintiff, meanwhile, could be repeatedly written up over a winter cap, her hair, and a body-camera buffer.

309. Sexual degradation was normalized.

310. Plaintiff's minor conduct was magnified.

311. DOMINGUEZ's retaliatory conduct continued alongside the formal discipline.

312. On March 29, 2025, plaintiff and her partner, Police Officer Devin Lopez, were working in an RMP.

313. DOMINGUEZ entered the office and publicly questioned why plaintiff and Lopez had not transported Brown and Hubbard to another post.

314. He then suggested that plaintiff and Brown must have some undisclosed conflict.

315. No such conflict existed.

316. DOMINGUEZ invented one.

317. The accusation was particularly manipulative because DOMINGUEZ himself had previously complained that others did not want to work with Brown.

318. He nevertheless recast plaintiff as the person creating interpersonal friction.

319. The “cold” phase was now operating openly.

320. DOMINGUEZ was no longer seeking plaintiff’s approval directly.

321. He was shaping how others perceived her.

322. On April 2, 2025, DOMINGUEZ again used plaintiff’s discipline as a means of public provocation.

323. Police Officers Robert Lawson and Brandon Pena were present.

324. DOMINGUEZ raised plaintiff’s Command Discipline publicly.

325. Plaintiff refused to engage.

326. She ignored him.

327. DOMINGUEZ later complained that plaintiff had ignored his comment.

328. Even while using plaintiff’s discipline to embarrass her, DOMINGUEZ remained preoccupied with whether plaintiff would respond to him.

329. He provoked.

330. Plaintiff withdrew.

331. DOMINGUEZ objected to being ignored.

332. The push-and-pull had not ended.

333. It had simply moved from sexual conversation into professional humiliation.

334. On April 3, 2025, plaintiff confronted DOMINGUEZ by text after learning that he was discussing her Command Discipline with Francis.

335. DOMINGUEZ admitted that he had been discussing plaintiff's disciplinary matter with Francis.

336. Plaintiff asked why he was discussing her private disciplinary affairs with another officer.

337. DOMINGUEZ refused to explain himself.

338. He simply responded: "No."

339. The same entitlement that had governed DOMINGUEZ's treatment of plaintiff's personal boundaries now governed her professional privacy.

340. He treated plaintiff's discipline as information he was free to discuss because he possessed access to it.

341. That same day, Brown told plaintiff that DOMINGUEZ behaved like "that kid on the playground who picks on the girl he likes."

342. Brown independently connected DOMINGUEZ's antagonistic behavior to his attraction to plaintiff.

343. The hot-and-cold dynamic was visible to plaintiff's coworkers: the supervisor who wanted plaintiff's attention was now "picking on" her because she would not give it to him.

344. Plaintiff also fell down stairs while working with Brown on April 3, 2025.

345. Plaintiff got up and continued working.

346. She did not make an issue of the fall.

347. DOMINGUEZ later accessed and reviewed Brown's body-worn-camera footage depicting plaintiff's fall.

348. On April 4, 2025, DOMINGUEZ approached Brown and asked why she had not placed plaintiff's fall into the group chat.

349. Brown refused to participate.

350. DOMINGUEZ was not checking on plaintiff's welfare.

351. He wanted her fall circulated.

352. Plaintiff alleges that the supervisor who had previously sexualized her was now attempting to turn a vulnerable physical moment involving her body into workplace entertainment.

353. The request fit the same frat-boy culture in which images, bodies, embarrassment, and sexuality could become group-chat material.

354. Brown was a direct witness to the request.

355. On April 5, 2025, DOMINGUEZ created another false narrative concerning plaintiff.

356. Plaintiff had properly returned the keys to an electric RMP through Tour Supervisor personnel.

357. She advised them that the vehicle required charging.

358. DOMINGUEZ nevertheless contacted Lawson and stated that he could not reach plaintiff.

359. He claimed plaintiff "always" hid vehicle keys in her locker.

360. He claimed she never returned them properly.

361. He described plaintiff as annoying and frustrating.

362. Plaintiff contacted the appropriate Tour Supervisor personnel.

363. They confirmed that DOMINGUEZ had never contacted them to locate the keys.

364. DOMINGUEZ had not investigated a problem and gotten it wrong.

365. He had never attempted to determine whether a problem existed before speaking negatively about plaintiff.

366. Plaintiff alleges that DOMINGUEZ manufactured the issue to continue portraying her as irresponsible and difficult after she rejected his unwanted sexual attention.

367. Lawson was a direct recipient of DOMINGUEZ's statements.

368. The Tour Supervisor personnel are corroborating witnesses that DOMINGUEZ never attempted to verify his accusations.

369. On April 6, 2025, Police Officer Jessica Velez gave plaintiff another warning concerning DOMINGUEZ.

370. Velez had previously worked with DOMINGUEZ when he was a Police Officer at PSA 5.

371. Velez told plaintiff that DOMINGUEZ had a habit of fixating upon certain women.

372. She described his conduct toward women as uncomfortable and manipulative.

373. Velez told plaintiff: "He likes you—but not in a healthy way."

374. She explained that DOMINGUEZ sought women's attention by picking at them rather than treating them respectfully.

375. Velez further described DOMINGUEZ as someone who lied and manufactured stories.

376. Velez's observations predated plaintiff's experience with DOMINGUEZ.

377. Her warning placed plaintiff's experience into a broader pattern of fixation, attention-seeking, manipulation, and antagonism toward women.

378. Plaintiff was not the only female officer who recognized how DOMINGUEZ operated.

379. Later that same day, DOMINGUEZ openly exposed the sexual component of his continuing preoccupation with plaintiff.

380. Plaintiff briefly entered an office occupied by Detective Specialist Luis D. Sandres, Police Officers Frank A. Digiovanna, and Arena.

381. After plaintiff left, DOMINGUEZ loudly stated in substance: "Oh my God, how do you guys even get used to working with her? Look at her—how are you not completely distracted by how good looking she is?"

382. DOMINGUEZ was no longer speaking about plaintiff's work.

383. He was inviting male officers to evaluate plaintiff sexually.

384. He reduced plaintiff from Police Officer to physical appearance.

385. He suggested that her body was so sexually distracting that male officers could barely be expected to function professionally around her.

386. Lawson later told plaintiff what DOMINGUEZ had said.

387. Sandres witnessed the statement.

388. Digiovanna witnessed the statement.

389. Arena witnessed the statement.

390. None of them reported DOMINGUEZ.

391. That silence was part of the frat-boy atmosphere.

392. DOMINGUEZ could sexualize a female subordinate before several male officers without producing an internal complaint.

393. Plaintiff understood that officers did not want to “make waves,” trigger OEEO scrutiny, or become responsible for bringing attention to the command.

394. The culture rewarded silence.

395. The cost of that silence was borne by plaintiff.

396. DOMINGUEZ’s April 6 remarks also exposed the hot-and-cold dynamic in its clearest form.

397. He had become cold toward plaintiff directly.

398. He had reduced the repeated driving assignments.

399. He was discussing her discipline.

400. He was creating negative stories about her.

401. Yet when plaintiff was absent, he remained openly sexually preoccupied with her appearance.

402. The attraction had not disappeared.

403. It existed simultaneously with resentment.

404. Plaintiff alleges that the hostility was not evidence that the sexual interest had ended.

405. The hostility was the consequence of plaintiff refusing to reciprocate it.

406. The grooming pattern had therefore moved through access, familiarity, sexualization, rejection, withdrawal, renewed provocation, objectification, and retaliation.

407. The pursuit had failed.

408. The punishment had begun.

409. On May 15, 2025, plaintiff was removed from High-Tech and assigned to the midnight tour.

410. Plaintiff alleges directly that the movement was retaliatory.

411. Plaintiff was moved because she had rejected COHN's unwanted sexual attention.

412. Plaintiff was moved because she had rejected DOMINGUEZ's unwanted sexual attention.

413. Plaintiff was moved because she refused to participate in the sexually charged workplace relationship DOMINGUEZ attempted to cultivate.

414. Plaintiff was moved because she refused to conform to the frat-boy culture in which sexual boundary violations were normalized and women were expected either to tolerate the conduct or accept the consequences of resisting it.

415. Plaintiff remained assigned to the midnight tour for approximately one year.

416. She had never previously been forced to work that schedule continuously for such an extended period.

417. There was no defined end date.

418. Plaintiff sought movement to a day tour or 4-by tour.

419. She was told movements would occur by seniority.

420. Yet rookie officers completing field-training assignments obtained preferred tours.

421. Plaintiff remained on midnights.

422. PBA Delegate Police Officer Jacs Worch called plaintiff and asked what she had done to "piss off" COHN because COHN was refusing to move her.

423. Worch independently connected plaintiff's prolonged midnight placement to COHN personally.

424. The commanding officer whose unwanted sexual attention plaintiff had rejected was still controlling whether she remained trapped on the least desirable tour.

425. The retaliatory midnight assignment consumed plaintiff's life.

426. Her normal sleep cycle collapsed.

427. She could not sleep normally during daylight hours.

428. Plaintiff eventually required prescription medication merely to sleep during the day.

429. Even when she slept, she awoke disoriented and panicked.

430. At times she believed she had overslept, missed work, or was late because her entire sense of time had become distorted.

431. Plaintiff required extensive counseling.

432. She attended counseling weekly or biweekly.

433. She repeatedly discussed the retaliation, insomnia, exhaustion, anxiety, inability to cope with the schedule, and her belief that the retaliation would never end.

434. Plaintiff described herself as "just existing."

435. For the first time in more than twelve years with the NYPD, she hated reporting to work.

436. She seriously considered resigning.

437. Plaintiff was not considering leaving because she had stopped wanting to be a Police Officer.

438. She was considering leaving because the command had made remaining one emotionally and psychologically intolerable.

439. The midnight assignment also followed plaintiff home.

440. Because plaintiff was away throughout the night, her service animals sometimes barked while she worked.

441. Neighbor complaints followed.

442. Plaintiff ultimately lost her housing.

443. Her service animals existed to assist her with anxiety.

444. Plaintiff was therefore simultaneously dealing with workplace retaliation, chronic sleep disruption, counseling, anxiety, exhaustion, housing instability, and the possible loss of the career in which she had invested more than twelve years.

445. Plaintiff alleges that these were the direct and continuing consequences of the retaliatory tour imposed after she rejected unwanted sexual attention and refused the sexualized culture at PSA 3.

446. Plaintiff's fear of reporting what was occurring was itself created by the culture she had witnessed.

447. She had watched Epps's nude body circulate through electronic communications.

448. She had heard Epps called a liar and a whore.

449. She had heard her sexual-harassment complaints mocked.

450. She had watched male officers remain silent when DOMINGUEZ sexualized plaintiff.

451. She had watched her own disciplinary affairs become workplace gossip.

452. She had experienced selective discipline herself.

453. Plaintiff therefore understood that entering the complaint process could expose her to the same people and the same culture from which she needed protection.

454. In June 2025, Sergeant Nicholas Albergo welcomed plaintiff to the midnight tour and asked why she had been placed there.

455. Plaintiff told Albergo directly that she had not reciprocated DOMINGUEZ's sexual advances and that DOMINGUEZ had kicked her out of High-Tech.

456. Plaintiff thereby contemporaneously attributed her adverse assignment to her rejection of DOMINGUEZ's sexual advances.

457. Albergo informed plaintiff that he was a mandatory reporter.

458. Albergo initiated an OEEO report.

459. OEEO thereafter contacted plaintiff.

460. Sergeant Gomez was associated with OEEO Log No. 2025498.

461. Plaintiff was afraid to cooperate fully.

462. She believed OEEO complaints were not meaningfully confidential.

463. She feared additional retaliation.

464. The command had already taught her what could happen to a woman whose sexual-harassment allegations became known.

465. OEEO nevertheless had actual notice that a female Police Officer was attributing an adverse assignment to her refusal to reciprocate sexual advances by a supervisor.

466. OEEO closed the matter without meaningfully investigating the harassment and retaliation plaintiff had disclosed.

467. The institutional response reinforced the atmosphere that had already silenced others at PSA 3.

468. The Department demanded that plaintiff expose herself further before it would meaningfully confront the misconduct, while plaintiff had already watched exposure turn another female officer into the subject of sexual degradation.

469. COHN's retaliatory hostility toward plaintiff continued during her midnight assignment.

470. On July 17, 2025, plaintiff was involved in a line-of-duty incident during which a perpetrator spat blood into her face and kicked her.

471. Plaintiff and Lopez went to the hospital.

472. After plaintiff returned, COHN entered the muster room where plaintiff, Lopez, and Ramos were present.

473. COHN began yelling at plaintiff at the top of his lungs.

474. He accused plaintiff of fabricating the fact that she had been kicked.

475. COHN announced that he would review the body-worn-camera footage to prove plaintiff was lying.

476. The footage showed plaintiff being kicked.

477. Ramos was stunned by COHN's treatment of plaintiff.

478. Ramos told plaintiff that he had never seen COHN speak to anyone that way, "much less a female."

479. COHN nevertheless minimized the fact that plaintiff had been spat upon with blood and kicked.

480. He criticized plaintiff for supposedly failing to exercise enough discipline and restraint.

481. Plaintiff was subsequently told by the officer who processed the arrest that COHN had instructed the Assistant District Attorney not to pursue an assault-on-a-police-officer charge because, according to COHN, plaintiff had not been assaulted.

482. The arresting officer is a presently unidentified witness whose identity is subject to discovery.

483. COHN also demanded plaintiff's hospital discharge paperwork.

484. Plaintiff refused to provide it.

485. COHN became enraged.

486. Plaintiff alleges that this conduct continued the same retaliatory effort to discredit her, invade her boundaries, undermine her credibility, and exercise personal command authority against her after she had rejected him.

487. COHN then converted plaintiff's midnight assignment into explicit command leverage.

488. PBA Delegate Police Officer Adam R. Rusin personally told plaintiff that COHN had said: "Tell Giraldo if she wants to get off midnights she needs to bring me activity."

489. The statement confirmed COHN's personal involvement in plaintiff's continued midnight assignment.

490. Relief from the retaliatory tour was something COHN treated as his to give or withhold.

491. The same commanding officer who had first tested plaintiff's sexual boundaries at the October 2023 barbecue was now communicating the price plaintiff had to pay to escape the working conditions imposed upon her.

492. Ramos had already told plaintiff that she was being targeted because she had “shut [COHN] down.”

493. Worch had asked plaintiff what she had done to “piss off” COHN because COHN would not move her.

494. Rusin now directly conveyed COHN’s own condition for releasing plaintiff from the midnight tour.

495. Multiple independent NYPD witnesses were therefore identifying COHN as personally connected to the adverse treatment plaintiff experienced after rejecting him.

496. Plaintiff remained assigned to PSA 3 until approximately May 15, 2026, when she was transferred to PSA 7.

497. By the time plaintiff left PSA 3, the sexual-grooming and retaliation sequence had been fully exposed.

498. COHN used command access to test plaintiff’s sexual boundaries.

499. Plaintiff rejected him.

500. COHN withdrew the direct sexual attention but retained command authority over her.

501. Plaintiff was thereafter subjected to public disciplinary exposure, differential reassignment, targeted discipline, prolonged midnight placement, attacks upon her credibility, and command leverage concerning whether she would ever leave that tour.

502. DOMINGUEZ used supervisory assignments to obtain repeated proximity to plaintiff.

503. He introduced intimate conversation.

504. He escalated to graphic sexual conversation.

505. He sought plaintiff's approval.
506. Multiple coworkers recognized his attraction.
507. Plaintiff refused to reciprocate.
508. DOMINGUEZ became cold.
509. He reduced the proximity he had previously sought.
510. He then discussed plaintiff's discipline, manufactured conflicts, created false narratives, attempted to turn plaintiff's fall into group-chat entertainment, and attacked her professional reputation.
511. Yet while treating plaintiff coldly to her face, DOMINGUEZ continued sexualizing her behind her back.
512. The attraction and hostility existed together.
513. That was the push-and-pull.
514. The grooming effort failed.
515. The resentment remained.
516. The resentment became retaliation.
517. ANGHEL and ABDELFATTAH reinforced the frat-boy environment by openly degrading and sexualizing a female NYPD officer who had complained of sexual harassment.
518. BRUNO supplied disciplinary authority through selective enforcement of appearance rules against plaintiff.
519. ISLAM supplied additional disciplinary authority through selective body-worn-camera scrutiny that was admittedly not applied to everyone.
520. The surrounding witnesses saw different pieces of the same environment.

521. Francis witnessed COHN's initial access to plaintiff, received plaintiff's disciplinary information from DOMINGUEZ, and participated in the PSA 3 electronic group-chat environment.

522. Arena personally witnessed DOMINGUEZ's graphic sexual conversation and independently identified DOMINGUEZ's attraction to plaintiff.

523. Weaver warned plaintiff about DOMINGUEZ's treatment of women.

524. Hubbard independently observed that DOMINGUEZ liked plaintiff and was acting strangely around her.

525. Brown served as a discipline comparator, observed DOMINGUEZ's attraction-based antagonism, and refused his attempt to turn plaintiff's fall into group-chat entertainment.

526. Velez recognized DOMINGUEZ's fixation upon plaintiff from a pattern she had seen before.

527. Lawson received DOMINGUEZ's false key narrative and informed plaintiff of DOMINGUEZ's objectifying remarks.

528. Pena witnessed DOMINGUEZ publicly discussing plaintiff's discipline.

529. Sandres, Digiovanna, and Arena witnessed DOMINGUEZ openly sexualize plaintiff before male coworkers.

530. Lopez witnessed the appearance-discipline comparator circumstances and COHN's July 17 treatment of plaintiff.

531. Ramos expressly identified plaintiff as being targeted because she had "shut [COHN] down" and personally witnessed COHN's later attack upon plaintiff's credibility.

532. Albergo heard plaintiff contemporaneously state that she had been removed from High-Tech because she refused DOMINGUEZ's sexual advances.

533. Gomez was associated with the OEEEO matter through which the Department obtained institutional notice.

534. Worch independently connected plaintiff's prolonged midnight assignment to COHN's personal hostility.

535. Rusin directly relayed COHN's condition for removing plaintiff from that assignment.

536. Tour Supervisor personnel possessed information contradicting DOMINGUEZ's fabricated RMP-key narrative.

537. The unidentified arrest officer possessed information concerning COHN's alleged effort to dissuade prosecution of the assault committed against plaintiff.

538. Plaintiff's account therefore did not exist in isolation.

539. Coworkers saw the sexual interest.

540. Coworkers saw the fixation.

541. Coworkers saw the objectification.

542. Coworkers saw the selective discipline.

543. Coworkers saw the retaliation.

544. Coworkers identified the connection between plaintiff rejecting COHN and the treatment that followed.

545. Yet PSA 3 did not correct the environment.

546. The frat-boy culture made the sexual behavior ordinary.

547. The rank structure made the behavior powerful.

548. The silence of witnesses made the behavior sustainable.

549. The disciplinary apparatus made rejection costly.

550. Plaintiff learned that a female officer could be sexualized by the very supervisors who controlled her employment and then be made to pay professionally when she refused them.

551. Plaintiff adapted by distancing herself, avoiding unnecessary interaction, refusing sexual engagement, remaining guarded around supervisors, ignoring provocations, and ultimately fearing the very complaint process that purported to protect her.

552. The command made plaintiff continuously calculate whether an interaction was legitimate supervision, another attempt at forced familiarity, another sexual boundary test, or the next retaliatory response to an earlier rejection.

553. That is the practical effect of sexual grooming inside a paramilitary workplace.

554. The subordinate is never permitted simply to say no and walk away.

555. The supervisor remains.

556. His rank remains.

557. His access remains.

558. His authority remains.

559. And when the attention turns cold, the subordinate remains exposed to everything that authority can do to her professionally.

560. Plaintiff alleges that her removal from Public Safety, placement into High Tech, repeated Command Disciplines, targeted body-worn-camera scrutiny, public humiliation, negative workplace narratives, removal from High Tech, prolonged midnight assignment, and continued command interference were imposed in response to her rejection of unwanted sexual attention and advances and her refusal to participate in PSA 3's sexually charged frat-boy culture.

561. Those employment actions were not independent of the sexual harassment.

562. They were the consequences of plaintiff refusing it.

563. The grooming conduct and the retaliation were therefore parts of the same course of conduct.

564. Rank supplied the access.

565. The frat-boy atmosphere normalized the sexualization.

566. The hot-and-cold push-and-pull tested whether plaintiff would submit.

567. Plaintiff refused.

568. Command authority supplied the punishment.

C. The Dissemination of Lieutenant Epps's "Coerced" Sexual Video by Defendant JEFFREY B. MADDREY, and THE CITY OF NEW YORK's Failure, through JESSICA S. TISCH, EDWARD A. THOMPSON, and JOSEPH A. DIBARTOLOMEO, to Stop Its Use as Workplace Sexual Fodder

569. The sexually explicit video depicting then-Lieutenant Quatisha Epps that ultimately reached plaintiff at PSA 3 did not originate as workplace pornography, entertainment, voluntary sexual exhibition, or material intended for circulation among NYPD employees.

570. The video arose within the coercive, manipulative, quid-pro-quo sexual-harassment scheme Epps alleged was imposed upon her by then-Chief of Department JEFFREY B. MADDREY through his extraordinary command authority.

571. Epps alleged that MADDREY used the authority of the Chief of Department's Office to obtain sexual access to her and subjected her to repeated acts of sexual coercion, including rapes and sodomies occurring inside NYPD Headquarters and the Office of the Chief of Department.

572. The video therefore cannot be separated from the coercive circumstances in which it was allegedly produced or provided.

573. It was not material Epps intended to circulate among NYPD personnel.

574. Epps did not provide the video to PSA 3 personnel, plaintiff, ALEXANDRU O. ANGHEL, MOHAMMAD ABDELFATTAH, CHRISTOPHER E. FRANCIS, or other members of service for viewing, discussion, ridicule, or entertainment.

575. Epps provided the video only to MADDREY.

576. MADDREY was therefore the sole intended and actual recipient of the video before it entered circulation among other NYPD personnel.

577. The same video thereafter left MADDREY's exclusive possession and entered NYPD employee circulation.

578. Plaintiff alleges that because MADDREY alone possessed the video before its dissemination, MADDREY caused, enabled, permitted, participated in, or was the source of its distribution to other NYPD personnel.

579. Whether MADDREY personally forwarded the video, displayed it to another person, permitted it to be copied from a device or account under his control, or otherwise enabled its dissemination is information within the possession of MADDREY, THE CITY OF NEW YORK, the NYPD, and the persons who thereafter received or redistributed it.

580. What is not uncertain is what happened after the video entered the NYPD workplace.

581. The video became sexual workplace fodder.

582. At PSA 3, ANGHEL and ABDELFATTAH openly discussed the video in plaintiff's presence.

583. They called Epps a "fucking liar."

584. They called her a "fucking whore."

585. They stated that the video was “for Maddrey.”
586. They mocked her sexual-harassment allegations.
587. They attacked her credibility and professional integrity.
588. Intimate material arising from an alleged coercive sexual-abuse-of-command relationship was thus transformed into a means of degrading the female officer who had accused senior NYPD command personnel of sexual misconduct.
589. The degradation was gendered at every level.
590. Epps alleged sexual coercion by a superior officer.
591. Intimate material produced or provided within that coercive environment entered NYPD circulation.
592. Her naked body then became workplace entertainment.
593. Her sexual-harassment allegations became a basis for ridicule.
594. Her credibility was attacked through the very sexual material connected to the coercive conduct she had alleged.
595. The resulting workplace use of the video reflected the type of gender-based exploitation addressed by the New York City Victims of Gender-Motivated Violence Protection Law, Administrative Code §§ 10-1101 through 10-1107.
596. That law recognizes civil liability against persons who commit, direct, enable, participate in, or conspire in crimes of violence motivated by gender.
597. Plaintiff does not allege that she was the direct victim of the sexual violence allegedly committed against Epps.

598. Plaintiff alleges that intimate material arising from that alleged gender-motivated sexual violence was introduced into plaintiff's own workplace and became part of the sexually hostile environment to which plaintiff was involuntarily exposed.

599. Plaintiff was exposed to the video while she herself was rejecting unwanted sexual attention from supervisory personnel, including COHN and DOMINGUEZ.

600. The significance to plaintiff was immediate.

601. She was watching how the NYPD workplace treated a female officer whose allegations involved sexual misconduct by one of the most powerful men in the Department.

602. The woman's body became the subject of workplace circulation.

603. Her allegations became gossip.

604. Her credibility became the target.

605. The video became another vehicle through which a woman alleging sexual exploitation could herself be sexually humiliated.

606. That experience reinforced the frat-boy atmosphere plaintiff was already experiencing at PSA 3.

607. It also reinforced the grooming environment confronting plaintiff.

608. Plaintiff was being required to resist unwanted sexual attention from supervisors while simultaneously witnessing another female officer be degraded through intimate material arising from alleged sexual coercion by senior command personnel.

609. The message to plaintiff was unmistakable: rejecting, resisting, or complaining about sexual misconduct could result in the woman herself becoming the next object of workplace ridicule, sexual discussion, and professional attack.

610. That message directly affected plaintiff's willingness to report what COHN and DOMINGUEZ were doing to her.

611. Plaintiff feared that reporting would expose her to the same culture she was seeking protection from.

612. She feared becoming workplace gossip.

613. She feared sexual humiliation.

614. She feared attacks upon her credibility.

615. She feared retaliation by the same institution charged with investigating the misconduct.

616. Plaintiff alleges that by the time JESSICA S. TISCH served as Police Commissioner, the continued circulation and workplace use of Epps's coerced sexual video constituted an NYPD institutional problem requiring immediate command intervention.

617. As Police Commissioner, TISCH possessed authority over Department-wide policy, discipline, investigations, workplace standards, corrective action, and the conduct of the Internal Affairs Bureau.

618. Defendant EDWARD A. THOMPSON, as Chief of the Internal Affairs Bureau, exercised substantial authority over investigations of misconduct by members of service, including supervisory misconduct, retaliation, sexual misconduct, misuse of Department systems, and conduct affecting the integrity of the Department.

619. Defendant JOSEPH A. DIBARTOLOMEO, as Executive Officer of the Internal Affairs Bureau, exercised substantial authority over IAB investigative operations, personnel, priorities, case supervision, and the Department's response to serious misconduct allegations involving members of service.

620. TISCH, THOMPSON, and DIBARTOLOMEO possessed the authority to cause an investigation into the source, transmission, display, redistribution, and workplace use of Epps's coerced sexual video.

621. They possessed the authority to identify the persons who transmitted and received the video.

622. They possessed the authority to preserve electronic evidence and examine Department-issued devices and communications within lawful investigative processes.

623. They possessed the authority to prohibit further dissemination and workplace display.

624. They possessed the authority to discipline or cause disciplinary proceedings against personnel who distributed, displayed, or used the video to sexually degrade Epps or other female members of service.

625. Plaintiff alleges that they failed to exercise that authority effectively.

626. The video remained in NYPD circulation.

627. It reached PSA 3.

628. It was openly discussed by NYPD personnel.

629. A supervisory Lieutenant participated in its degrading workplace use.

630. Plaintiff was involuntarily exposed to it.

631. Francis later advised plaintiff that PSA 3-related group chats remained active, further demonstrating the persistence of the electronic environment through which sexually degrading material and commentary could continue to circulate.

632. Plaintiff alleges that TISCH failed to cause effective Department-wide corrective action sufficient to stop the video from remaining workplace sexual fodder.

633. Plaintiff alleges that THOMPSON and DIBARTOLOMEO failed to ensure that IAB treated the dissemination of intimate material arising from alleged coercive sexual misconduct by the former Chief of Department as a serious integrity and sexual-misconduct issue.

634. Plaintiff further alleges that THOMPSON and DIBARTOLOMEO were desensitized to inappropriate sexual relationships between supervisory personnel and subordinate female officers because of their own histories of inappropriate relationships with subordinate female members of service, particularly Latina female officers.

635. Plaintiff alleges that those histories contributed to an institutional tolerance of sexual boundary violations involving rank and subordinate women and materially affected the seriousness with which such misconduct was recognized, investigated, and corrected.

636. The failure was not merely bureaucratic.

637. It reinforced a workplace culture in which male supervisors could cross sexual boundaries while female officers bore the consequences.

638. The Department failed to stop the circulation of the video.

639. It failed to prevent its display and discussion as workplace entertainment.

640. It failed to prevent personnel from using the video to call Epps a liar and a whore and attack her sexual-harassment allegations.

641. It failed to protect other female employees, including plaintiff, from involuntary exposure to intimate sexual imagery connected to alleged gender-motivated sexual violence.

642. It failed to prevent the video from reinforcing the sexually charged, frat-boy atmosphere already confronting plaintiff.

643. Plaintiff alleges that MADDREY's dissemination or enabling of dissemination constituted his direct participation in the continuation of the sexual exploitation associated with the video.

644. Plaintiff alleges that THE CITY OF NEW YORK, acting through TISCH and its Internal Affairs leadership, including THOMPSON and DIBARTOLOMEO, permitted that exploitation to migrate into the broader NYPD workplace and remain there.

645. The video was therefore not collateral gossip unrelated to plaintiff's own harassment.

646. It was part of the same institutional sexual culture plaintiff was experiencing personally.

647. Male command authority created sexual access.

648. Women who resisted or complained became the subject of attack.

649. Their sexuality became workplace conversation.

650. Their professional credibility became intertwined with the sexual misconduct directed toward them.

651. Other employees learned to remain silent.

652. The Department failed to stop the cycle.

653. Plaintiff alleges that the dissemination and continued workplace use of Epps's coerced sexual video materially contributed to the hostile work environment to which plaintiff was subjected because of her sex.

654. It materially reinforced plaintiff's fear of reporting sexual harassment.

655. It materially reinforced the grooming and retaliation she was experiencing from supervisory personnel.

656. MADDREY supplied the source from which the coerced video entered circulation.

657. TISCH, THOMPSON, and DIBARTOLOMEO failed to stop its continued institutional use and degradation.

658. THE CITY OF NEW YORK permitted it to become workplace sexual fodder.

659. Plaintiff was forced to experience the resulting sexually hostile environment.

D. Plaintiff's Transfer from PSA 3 and the Lingering Effects of the Sexually Hostile Environment

660. By the time plaintiff sought to leave PSA 3, she was not merely seeking a different assignment. She was trying to escape a command where unwanted sexual attention, grooming behavior, selective discipline, humiliation, retaliation, and a sexually charged frat-boy culture had become intertwined.

661. Plaintiff had rejected unwanted sexual attention from COHN and DOMINGUEZ, refused to participate in the sexualized workplace dynamic, and thereafter endured reassignment, repeated discipline, targeted scrutiny, public humiliation, professional undermining, and approximately one year on the midnight tour.

662. Plaintiff wanted a transfer because she no longer believed she could work normally at PSA 3 without wondering whether another assignment, disciplinary action, or supervisory interaction was connected to her rejection of unwanted sexual attention.

663. She left PSA 3 with severe sleep disruption, anxiety, exhaustion, counseling needs, prescription sleep medication, housing instability, and diminished confidence in the NYPD's internal complaint process.

664. Plaintiff also carried with her the lesson PSA 3 had taught her: sexual boundary violations could be normalized, female officers who complained could become workplace fodder, and rejecting unwanted attention could carry professional consequences.

665. On or about May 15, 2026, plaintiff transferred to PSA 7 hoping to leave that environment behind.

666. The transfer ended plaintiff's physical presence at PSA 3. It did not erase the effects of what she had experienced there.

667. Nor did it remove her from the broader NYPD culture that had taught her to distrust whether sexual misconduct against female officers would be taken seriously.

668. Approximately three months later, plaintiff experienced another sexual boundary violation—this time through direct unwanted physical sexual contact at PSA 7.

E. Police Service Area 7 — The Lingering Effects of PSA 3, Unwanted Sexual Touching, and Gender-Motivated Violence

669. Plaintiff arrived at PSA 7 carrying the effects of what she had endured at PSA 3.

670. The transfer changed plaintiff's command. It did not erase the sexual grooming, retaliation, humiliation, selective discipline, prolonged midnight assignment, fear of internal reporting, or loss of trust caused by PSA 3.

671. Plaintiff had spent more than a year learning that unwanted sexual attention from supervisors could be followed by coldness, retaliation, discipline, unfavorable assignments, public humiliation, and attacks upon her professional reputation when she refused to reciprocate.

672. She had also learned that sexually degrading conduct toward female officers could become normalized inside the NYPD, that coworkers could witness it and remain silent, and that women associated with sexual-harassment allegations could themselves become workplace fodder.

673. By the time plaintiff transferred to PSA 7 on or about May 15, 2026, she was exhausted, anxious, sleep-deprived, distrustful of the Department's internal complaint process, and acutely aware that an unwanted sexual boundary violation could carry consequences far beyond the initial act.

674. Plaintiff nevertheless hoped that leaving PSA 3 would allow her to work in a command where she could perform her duties without being sexualized, groomed, scrutinized, or punished for asserting personal boundaries.

675. That expectation did not last.

676. Approximately three months after her transfer, plaintiff was subjected to another sexual boundary violation inside an NYPD workplace—this time not through grooming, sexualized conversation, or supervisory pursuit, but through direct unwanted physical contact with an intimate part of her body.

677. On August 19, 2026, at approximately 1530 hours, following 4-by roll call, plaintiff was standing in the common desk area at PSA 7.

678. Defendant ELIZABETH OLIVERO approached plaintiff from behind.

679. Without consent, warning, invitation, or any legitimate workplace purpose, OLIVERO grabbed plaintiff's left buttock.

680. The touching was intentional.

681. It was not accidental, incidental, or ambiguous.

682. OLIVERO immediately laughed and announced, in substance, "that was me."

683. Plaintiff was shocked, angry, and violated.

684. The incident struck plaintiff with particular force because she had transferred from PSA 3 specifically trying to escape a workplace in which sexual boundaries involving female officers had been repeatedly disregarded.

685. Instead, another NYPD employee had now placed her hand directly on plaintiff's body inside a different command.

686. Plaintiff immediately left the area.

687. OLIVERO followed plaintiff outside.

688. OLIVERO then stated, in substance, "Oh my God, I thought you was gonna fuck me up! That's why I said it was me."

689. OLIVERO's own statement demonstrated that she understood the touching was serious enough to provoke an angry physical reaction.

690. She knew plaintiff had not invited it.

691. She nevertheless treated the conduct as humorous.

692. Plaintiff did not.

693. For plaintiff, the incident confirmed that the sexualized workplace culture she had experienced at PSA 3 was not confined to one command or one group of supervisors.

694. Plaintiff had left PSA 3 after learning that sexual boundaries could be tested through rank, proximity, grooming, objectification, and retaliation.

695. At PSA 7, another member of service simply crossed the boundary physically.

696. Plaintiff immediately disclosed what OLIVERO had done to her partner, Police Officer Nicole Neri.

697. Neri did not react as though OLIVERO's conduct was unprecedented.

698. Instead, Neri told plaintiff, in substance, “that’s what she does,” “no one says anything,” and “that’s just how she is.”

699. Those statements were devastating to plaintiff because they reproduced the same institutional lesson, she had carried from PSA 3.

700. Employees knew.

701. Employees had apparently seen or heard about similar conduct.

702. No one said anything.

703. The behavior continued.

704. Plaintiff alleges that Neri’s response demonstrated that OLIVERO’s conduct had been normalized within the workplace rather than treated as an unacceptable sexual boundary violation.

705. The response also reinforced plaintiff’s existing distrust of the Department’s willingness to protect female officers from unwanted sexual conduct.

706. Plaintiff had transferred to PSA 7 hoping to leave behind a command where silence protected sexually inappropriate conduct.

707. Instead, within months she was being told at PSA 7 that unwanted touching was simply “what [OLIVERO] does” and that “no one says anything.”

708. The form of the misconduct had changed.

709. The institutional response had not.

710. Plaintiff alleges that OLIVERO intentionally and without legitimate purpose grabbed plaintiff’s left buttock, an intimate part of plaintiff’s body, for the purpose of degrading or abusing plaintiff and/or gratifying sexual desire.

711. Plaintiff alleges that OLIVERO thereby committed Forcible Touching in violation of New York Penal Law § 130.52(1).

712. Forcible Touching constitutes a crime against the person and therefore a “crime of violence” within the meaning of the New York City Victims of Gender-Motivated Violence Protection Law, Administrative Code § 10-1103.

713. Plaintiff further alleges that OLIVERO committed the crime because of and on the basis of plaintiff’s gender and that the conduct was motivated, at least in part, by gender.

714. OLIVERO’s conduct therefore constituted a crime of violence motivated by gender actionable under Administrative Code § 10-1104.

715. Plaintiff was the direct victim of that conduct.

716. The incident also materially continued and intensified the sexually hostile environment plaintiff had already experienced within the NYPD.

717. At PSA 3, plaintiff had been subjected to grooming, sexualized attention, objectification, retaliation, selective discipline, and institutional silence.

718. At PSA 7, the disregard for plaintiff’s sexual boundaries escalated into direct physical contact with an intimate part of her body.

719. Plaintiff alleges that the PSA 7 incident confirmed that the broader NYPD problem was not limited to one command, one supervisor, or one form of misconduct.

720. The common feature was institutional tolerance of sexual boundary violations against female officers.

721. Plaintiff had transferred seeking distance from that culture.

722. She encountered it again.

CONCLUSION

722. Plaintiff DELINDA N. GIRALDO endured a continuous course of sex-based hostility, unwanted sexual attention, adult sexual-grooming behavior, retaliation, selective discipline, humiliation, and invasive touching while serving in the NYPD.

723. At PSA 3, plaintiff rejected unwanted sexual attention from supervisory personnel and refused to participate in a sexually charged, frat-boy workplace culture. Plaintiff alleges that her rejection was followed by adverse assignments, targeted scrutiny, repeated Command Disciplines, public discussion of her disciplinary affairs, professional undermining, removal from preferred assignments, and approximately one year on the midnight tour.

724. The same environment exposed plaintiff to Lieutenant Epps's "coerced" sexual video after it entered NYPD circulation from defendant JEFFREY B. MADDREY's exclusive possession and became workplace sexual fodder. Plaintiff alleges that THE CITY OF NEW YORK, through JESSICA S. TISCH, EDWARD A. THOMPSON, and JOSEPH A. DIBARTOLOMEO, failed to stop its continued circulation, degrading use, and contribution to the sexually hostile workplace culture.

725. Plaintiff transferred from PSA 3 hoping to escape that environment. Instead, at PSA 7, defendant ELIZABETH OLIVERO intentionally grabbed plaintiff's buttock, laughed about the touching, and acted within a workplace where plaintiff was immediately told that such conduct was simply "what she does" and that "no one says anything."

726. Plaintiff alleges that these events were not isolated or unrelated. They reflected a broader NYPD culture in which sexual boundaries involving female officers were normalized, rank supplied access and leverage, rejection invited retaliation, sexually explicit material involving female officers became workplace entertainment, and internal accountability mechanisms failed to provide meaningful protection.

727. As a direct and proximate result of defendants' conduct, plaintiff suffered and continues to suffer emotional distress, humiliation, anxiety, sleep disruption, loss of professional dignity, disruption of her home and personal life, damage to her working conditions, and other economic and non-economic injuries.

728. Plaintiff therefore seeks all legal and equitable relief available under the New York State Human Rights Law, the New York City Human Rights Law, the New York City Victims of Gender-Motivated Violence Protection Law, and all other applicable law, together with compensatory damages, punitive damages against the individual defendants where authorized, attorneys' fees and costs, prejudgment and post-judgment interest, appropriate declaratory and injunctive relief, and such other and further relief as this Court deems just and proper.

VIOLATIONS AND CLAIMS ALLEGED

FIRST CAUSE OF ACTION

Sexual Harassment and Sex Discrimination in Violation of the New York State Human Rights Law

Executive Law § 296(1)(a), (1)(h), and (6) Against All Defendants

729. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

730. Plaintiff is a woman and is protected from discrimination and harassment because of sex under the New York State Human Rights Law.

731. Defendant THE CITY OF NEW YORK was plaintiff's employer within the meaning of Executive Law § 292 and was prohibited from discriminating against or subjecting plaintiff to inferior terms, conditions, or privileges of employment because of her sex.

732. Plaintiff was subjected to unwanted sexual attention, sexual boundary testing, adult sexual-grooming behavior, forced familiarity, graphic sexual commentary, sexual objectification, degrading discussion of female officers, involuntary exposure to sexually explicit workplace material, and unwanted physical sexual touching.

733. Defendant COHN used his position as plaintiff's commanding officer to direct unwanted sexual attention toward plaintiff and thereafter participated in adverse treatment after plaintiff rejected and distanced herself from him.

734. Defendant DOMINGUEZ used supervisory access and repeated proximity to impose unwanted intimate and sexually explicit conduct upon plaintiff, sought her attention and approval, objectified her before other officers, and shifted from sexualized attention to hostility and professional undermining after plaintiff refused to reciprocate.

735. Defendants ANGHEL and ABDELFATTAH contributed to and reinforced the sex-based workplace environment through their degrading discussion of Lieutenant Epps, her "coerced" sexual video, and her sexual-harassment allegations.

736. Defendant MADDREY caused, enabled, permitted, participated in, or was the source of the dissemination of Epps's "coerced" sexual video from his exclusive possession into NYPD circulation, thereby contributing to a workplace environment in which intimate sexual material arising from alleged coercive conduct against a female officer became workplace fodder.

737. Defendants TISCH, THOMPSON, and DIBARTOLOMEO participated in, enabled, acquiesced in, or failed to take effective corrective action against the continued circulation and degrading workplace use of that material despite their command and investigative authority.

738. Defendants BRUNO and ISLAM participated in the discriminatory environment by selectively subjecting plaintiff to disciplinary scrutiny after she rejected unwanted sexual attention from supervisory personnel.

739. Defendant OLIVERO intentionally grabbed plaintiff's buttock without consent, subjected plaintiff to direct unwanted sexual touching, and thereby further subjected plaintiff to inferior terms and conditions of employment because of sex.

740. The foregoing conduct subjected plaintiff to inferior terms, conditions, and privileges of employment because she is a woman and constituted unlawful sex discrimination and sexual harassment under Executive Law § 296.

741. The individually named defendants who personally participated in, encouraged, enabled, incited, acquiesced in, or intentionally assisted the foregoing discrimination and harassment are individually liable as aiders and abettors pursuant to Executive Law § 296(6).

742. As a direct and proximate result, plaintiff suffered economic and non-economic damages, including emotional distress, humiliation, anxiety, sleep disruption, professional injury, and disruption of her personal life.

SECOND CAUSE OF ACTION
Race, Ethnicity, and National-Origin Discrimination in Violation of the New York State
Human Rights Law
Executive Law § 296(1)(a), (1)(h), and (6)
Against All Defendants

743. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

744. Plaintiff is a Colombian Latina woman and is protected from discrimination because of her race, ethnicity, and Colombian national origin.

745. Plaintiff alleges that the discriminatory treatment she experienced cannot be divorced from the intersection of her sex and her identity as a Latina woman of Colombian national origin.

746. Plaintiff was subjected to materially different treatment in assignments, discipline, scrutiny, workplace respect, and the enforcement of Department rules while similarly situated employees outside plaintiff's protected classes were treated more favorably.

747. Plaintiff was removed from preferred assignments, denied employment choices afforded to other officers, subjected to repeated and selective Command Disciplines, targeted body-worn-camera review, prolonged unfavorable tour placement, public humiliation, and attacks upon her professional reputation.

748. The discriminatory environment also reflected a broader workplace culture in which Latina female officers were subjected to sexualized attention, objectification, unequal treatment, and hostility when they resisted or rejected supervisory attention.

749. Plaintiff alleges that defendants' treatment of her was motivated, at least in part, by her race, Latina ethnicity, Colombian national origin, sex, and the intersection of those protected characteristics.

750. Defendants who exercised supervisory or disciplinary authority over plaintiff—including COHN, DOMINGUEZ, BRUNO, ISLAM, and ANGHEL—personally participated in, enabled, or contributed to the differential treatment and discriminatory conditions alleged herein.

751. Plaintiff further alleges that TISCH, THOMPSON, and DIBARTOLOMEO participated in or enabled an institutional environment that failed to meaningfully confront discriminatory and sexual boundary violations affecting subordinate female officers, including Latina female officers.

752. The foregoing conduct subjected plaintiff to inferior terms, conditions, and privileges of employment because of her protected race, ethnicity, and national origin in violation of Executive Law § 296.

753. Each individual defendant who actually participated in, encouraged, enabled, incited, or intentionally assisted such discrimination is individually liable pursuant to Executive Law § 296(6).

754. As a direct and proximate result, plaintiff suffered economic and non-economic damages.

THIRD CAUSE OF ACTION
Hostile Work Environment in Violation of the New York State Human Rights Law
Executive Law § 296(1)(h) and (6)
Against All Defendants

755. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

756. Plaintiff was subjected to harassment and inferior terms, conditions, and privileges of employment because of her sex and, in combination, her race, Latina ethnicity, and Colombian national origin.

757. The hostile environment included unwanted sexual attention from supervisory personnel, adult sexual-grooming behavior, repeated boundary testing, forced sexual and intimate conversation, objectification, degrading sexual commentary concerning female NYPD officers, circulation and workplace use of Epps's "coerced" sexual video, selective discipline, targeted scrutiny, retaliatory assignment changes, public humiliation, workplace gossip concerning plaintiff's discipline, and direct unwanted sexual touching.

758. The conduct occurred over an extended period, involved multiple commands and multiple members of service, and was reinforced by supervisory participation, coworker silence, selective disciplinary enforcement, and ineffective internal intervention.

759. Plaintiff's workplace became one in which she was required continually to assess whether supervisory attention was professional, another sexual boundary test, or the beginning of additional retaliation.

760. Plaintiff was treated less well and subjected to inferior conditions of employment because of her protected characteristics.

761. The environment materially affected plaintiff's psychological well-being, professional confidence, sleep, personal life, willingness to report misconduct, and ability to perform her employment without fear of further sexualized or retaliatory conduct.

762. THE CITY OF NEW YORK is liable for the discriminatory and hostile environment created, participated in, permitted, or left uncorrected by its managerial and supervisory personnel as provided by the NYSHRL.

763. COHN and DOMINGUEZ personally participated in the sexualized and hostile treatment directed toward plaintiff.

764. ANGHEL and ABDELFATTAH personally participated in the degrading sex-based workplace atmosphere.

765. BRUNO and ISLAM participated in the selective disciplinary and scrutiny mechanisms that reinforced the hostile environment.

766. MADDREY participated in or enabled the dissemination of Epps's "coerced" sexual video into the NYPD workplace.

767. TISCH, THOMPSON, and DIBARTOLOMEO participated in, enabled, acquiesced in, or failed to effectively correct the institutional conditions permitting that material to remain workplace sexual fodder.

768. OLIVERO personally intensified the hostile environment by intentionally grabbing plaintiff's buttock at PSA 7.

769. Each individual defendant who actually participated in, enabled, encouraged, incited, or intentionally assisted the creation or perpetuation of the hostile environment is individually liable pursuant to Executive Law § 296(6).

770. Defendants' conduct violated Executive Law § 296(1)(h) and § 296(6).

771. As a direct and proximate result, plaintiff suffered economic and non-economic damages.

FOURTH CAUSE OF ACTION
Retaliation in Violation of the New York State Human Rights Law
Executive Law § 296(7) and (6)
Against All Defendants

772. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

773. Plaintiff engaged in protected activity by rejecting and opposing unwanted sexual attention and sexualized conduct, refusing to participate in discriminatory and sexually hostile workplace behavior, complaining to supervisors about such treatment, disclosing that she believed her removal from High Tech resulted from her refusal to reciprocate DOMINGUEZ's sexual advances, and participating in the resulting internal reporting process.

774. Plaintiff's resistance to unwanted sexual attention and opposition to sexually discriminatory conduct communicated that the conduct was unwelcome and that plaintiff would not participate in or submit to it.

775. Defendants knew of plaintiff's opposition through her direct rejection of their conduct, her distancing and refusal to engage, her complaints and communications concerning the treatment, her disclosure to Sergeant Albergo, and the resulting OEE0 referral.

776. After plaintiff rejected COHN's unwanted sexual attention, plaintiff was subjected to public discussion of disciplinary matters, differential assignment treatment, targeted scrutiny, selective Command Disciplines, and prolonged adverse tour placement.

777. Sergeant Ramos contemporaneously told plaintiff that she was being targeted because she had "shut [COHN] down" and warned that COHN's "minion[s]" would look for opportunities to "hammer" her.

778. After plaintiff rejected DOMINGUEZ's unwanted sexual attention and refused to participate in the personal and sexualized relationship he attempted to cultivate, DOMINGUEZ's conduct shifted from repeated attention and proximity to coldness, professional hostility, public discussion of plaintiff's discipline, manufactured workplace conflicts, humiliation, false narratives, and attacks upon plaintiff's professional standing.

779. Plaintiff contemporaneously told Sergeant Albergo that she believed she had been removed from High-Tech because she refused to reciprocate DOMINGUEZ's sexual advances.

780. Plaintiff was thereafter subjected to approximately one year on the midnight tour despite seeking movement to another tour.

781. PBA Delegate Worch questioned what plaintiff had done to "piss off" COHN because COHN would not move her from midnights.

782. PBA Delegate Rusin subsequently relayed COHN's statement that if plaintiff wanted to get off midnights she needed to "bring [COHN] activity."

783. Plaintiff alleges that the assignment changes, Command Disciplines, targeted scrutiny, humiliation, professional undermining, removal from High-Tech, prolonged midnight assignment, and continued command interference would reasonably deter an employee from opposing discrimination or sexual harassment.

784. Plaintiff alleges that these actions were taken because she rejected unwanted sexual attention, opposed sexually discriminatory workplace conduct, and refused to submit to or participate in the sexually hostile workplace environment.

785. COHN and DOMINGUEZ personally participated in the retaliation directed toward plaintiff.

786. BRUNO and ISLAM aided, abetted, enabled, or participated in the retaliation through selective disciplinary and compliance enforcement.

787. Any other individual defendant who knowingly and actually participated in, enabled, encouraged, incited, or intentionally assisted the retaliatory conduct is individually liable pursuant to Executive Law § 296(6).

788. Defendants thereby violated Executive Law § 296(7) and § 296(6).

789. As a direct and proximate result of defendants' retaliation, plaintiff suffered economic and non-economic damages, including emotional distress, anxiety, sleep disruption, professional injury, housing instability, and other consequential losses.

FIFTH CAUSE OF ACTION
Sexual Harassment and Sex Discrimination in Violation of the New York City Human
Rights Law
Administrative Code § 8-107(1)(a) and (6)
Against All Defendants

790. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

791. Plaintiff is a woman and is protected from discrimination because of sex under the New York City Human Rights Law.

792. Defendant THE CITY OF NEW YORK was plaintiff's employer and was prohibited from treating plaintiff less well, or subjecting her to inferior terms, conditions, or privileges of employment, because of her sex.

793. Plaintiff was subjected to unwanted sexual attention, sexual boundary testing, adult sexual-grooming behavior, forced familiarity, graphic sexual commentary, sexual objectification, degrading discussion of female officers, involuntary exposure to sexually explicit workplace material, selective discipline following rejection of sexual attention, and direct unwanted sexual touching.

794. COHN used his position as plaintiff's commanding officer to direct unwanted sexual attention toward plaintiff and thereafter participated in unfavorable treatment after plaintiff rejected and distanced herself from him.

795. DOMINGUEZ used supervisory authority and repeated workplace proximity to impose unwanted intimate and sexually explicit conduct upon plaintiff, sought her attention and approval, objectified her before coworkers, and shifted from sexualized pursuit to coldness, hostility, humiliation, and professional undermining after plaintiff refused to reciprocate.

796. ANGHEL and ABDELFATTAH reinforced the sexually hostile workplace atmosphere through their degrading discussion of Lieutenant Epps, her "coerced" sexual video, and her sexual-harassment allegations.

797. MADDREY caused, enabled, permitted, participated in, or was the source of the dissemination of Epps's "coerced" sexual video from his exclusive possession into NYPD

circulation, permitting intimate sexual material arising from alleged coercive command-level sexual misconduct to become workplace sexual fodder.

798. TISCH, THOMPSON, and DIBARTOLOMEO participated in, enabled, acquiesced in, or failed to take effective corrective action against the continued circulation and degrading workplace use of that material despite their command and investigative authority.

799. BRUNO and ISLAM participated in the sex-based discriminatory environment by selectively subjecting plaintiff to disciplinary scrutiny after she rejected unwanted sexual attention from supervisory personnel.

800. OLIVERO intentionally grabbed plaintiff's buttock without consent and thereby subjected plaintiff to direct unwanted sexual touching in the workplace because of sex.

801. Plaintiff was treated less well than she otherwise would have been because she is a woman.

802. The conduct alleged herein exceeded petty slights and trivial inconveniences and altered plaintiff's working conditions through sexualization, humiliation, scrutiny, discipline, undesirable assignments, and invasive touching.

803. THE CITY OF NEW YORK is liable for the conduct of its managerial and supervisory employees and for discriminatory conduct it knew of, acquiesced in, or failed to correct as provided by Administrative Code § 8-107(13).

804. Each individual defendant who aided, abetted, incited, compelled, coerced, enabled, or otherwise actually participated in the foregoing unlawful discrimination is individually liable pursuant to Administrative Code § 8-107(6).

805. Defendants' conduct violated Administrative Code § 8-107(1)(a) and (6).

806. As a direct and proximate result, plaintiff suffered economic and non-economic damages, including emotional distress, humiliation, anxiety, sleep disruption, professional injury, and disruption of her personal life.

SIXTH CAUSE OF ACTION
Race, Ethnicity, and National-Origin Discrimination in Violation of the New York City
Human Rights Law
Administrative Code § 8-107(1)(a) and (6)
Against All Defendants

807. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

808. Plaintiff is a Colombian Latina woman and is protected from discrimination because of race, ethnicity, and national origin under the NYCHRL.

809. Plaintiff alleges that defendants' treatment of her cannot be separated from the intersection of her sex, Latina ethnicity, race, and Colombian national origin.

810. Plaintiff was treated less well in assignments, discipline, scrutiny, workplace respect, enforcement of Department rules, and access to employment opportunities while employees outside plaintiff's protected classes received more favorable treatment.

811. Plaintiff was removed from preferred assignments, denied assignment options afforded to other officers, subjected to repeated and selective Command Disciplines, targeted body-worn-camera review, prolonged unfavorable tour placement, public humiliation, and attacks upon her professional reputation.

812. The discriminatory atmosphere also reflected a broader NYPD culture in which Latina female officers were subjected to sexualized attention, objectification, unequal treatment, inappropriate supervisory relationships, and hostility when they resisted or rejected supervisory attention.

813. Plaintiff alleges that defendants' treatment of her was motivated, at least in part, by her race, Latina ethnicity, Colombian national origin, sex, and the intersection of those protected characteristics.

814. COHN, DOMINGUEZ, BRUNO, ISLAM, and ANGHEL personally participated in, enabled, or contributed to the differential treatment and discriminatory conditions imposed upon plaintiff.

815. Plaintiff further alleges that TISCH, THOMPSON, and DIBARTOLOMEO participated in, enabled, acquiesced in, or failed to effectively correct an institutional environment in which discriminatory and sexual boundary violations affecting subordinate Latina female officers were tolerated.

816. Plaintiff was thereby treated less well because of her protected characteristics in violation of Administrative Code § 8-107(1)(a).

817. THE CITY OF NEW YORK is liable pursuant to Administrative Code § 8-107(13) for discriminatory conduct committed by managerial and supervisory personnel and for conduct known to or left uncorrected by the employer.

818. Each individual defendant who aided, abetted, incited, compelled, coerced, enabled, or actually participated in such discrimination is individually liable pursuant to Administrative Code § 8-107(6).

819. As a direct and proximate result, plaintiff suffered economic and non-economic damages.

SEVENTH CAUSE OF ACTION
Hostile Work Environment in Violation of the New York City Human Rights Law
Administrative Code § 8-107(1)(a), (6), and (13)
Against All Defendants

820. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

821. Plaintiff was treated less well and subjected to inferior terms, conditions, and privileges of employment because of her sex and, in combination, her race, Latina ethnicity, and Colombian national origin.

822. The hostile work environment included unwanted sexual attention from supervisory personnel, adult sexual-grooming behavior, repeated boundary testing, forced sexual and intimate conversation, objectification, degrading sexual commentary concerning female NYPD officers, circulation and workplace use of Epps's "coerced" sexual video, selective discipline, targeted scrutiny, retaliatory assignment changes, public humiliation, workplace gossip concerning plaintiff's discipline, and direct unwanted sexual touching.

823. The conduct extended across multiple years, commands, supervisors, and members of service and was reinforced by supervisory participation, coworker silence, selective disciplinary enforcement, ineffective internal intervention, and the normalization of sexual boundary violations within the workplace.

824. Plaintiff was forced continually to assess whether supervisory attention was legitimate professional interaction, another sexual boundary test, another attempt to create forced familiarity, or the beginning of additional retaliation.

825. Plaintiff was treated less well because of her protected characteristics.

826. The conduct exceeded petty slights and trivial inconveniences.

827. The environment materially affected plaintiff's psychological well-being, professional confidence, sleep, home life, willingness to report misconduct, and ability to perform her duties without fear of further sexualized or retaliatory conduct.

828. COHN and DOMINGUEZ personally participated in the sexualized and hostile treatment directed toward plaintiff.

829. ANGHEL and ABDELFATTAH personally participated in and reinforced the degrading sex-based workplace atmosphere.

830. BRUNO and ISLAM participated in selective disciplinary and scrutiny mechanisms that intensified the hostile environment.

831. MADDREY participated in or enabled the dissemination of Epps's "coerced" sexual video into the NYPD workplace.

832. TISCH, THOMPSON, and DIBARTOLOMEO participated in, enabled, acquiesced in, or failed to effectively correct the institutional conditions permitting that material to remain workplace sexual fodder.

833. OLIVERO personally intensified and continued the hostile environment by intentionally grabbing plaintiff's buttock at PSA 7.

834. THE CITY OF NEW YORK is liable under Administrative Code § 8-107(13) for the discriminatory conduct of its managerial and supervisory personnel and for discriminatory conduct it knew of or failed to take immediate and appropriate corrective action against.

835. Each individual defendant who aided, abetted, incited, compelled, coerced, enabled, or actually participated in the creation or perpetuation of the hostile environment is individually liable under Administrative Code § 8-107(6).

836. Defendants thereby violated Administrative Code § 8-107(1)(a), (6), and (13).

837. As a direct and proximate result, plaintiff suffered economic and non-economic damages.

EIGHTH CAUSE OF ACTION
Retaliation in Violation of the New York City Human Rights Law
Administrative Code § 8-107(7) and (6)
Against All Defendants

838. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

839. Plaintiff engaged in protected activity by rejecting and opposing unwanted sexual attention and sexualized conduct, refusing to participate in discriminatory and sexually hostile workplace behavior, complaining concerning such treatment, disclosing that she believed her removal from High-Tech resulted from her refusal to reciprocate DOMINGUEZ's sexual advances, and participating in the resulting internal reporting process.

840. Plaintiff's opposition communicated that the sexualized and discriminatory conduct was unwelcome and that she would not participate in, accept, or submit to it.

841. Defendants knew of plaintiff's opposition through her direct rejection of their conduct, distancing and refusal to engage, complaints concerning her treatment, disclosure to Sergeant Albergo, and the resulting OEEO referral.

842. After plaintiff rejected COHN's unwanted sexual attention, she was subjected to public discussion of disciplinary matters, differential assignment treatment, targeted scrutiny, selective Command Disciplines, and prolonged unfavorable tour placement.

843. Sergeant Ramos contemporaneously told plaintiff that she was being targeted because she had "shut [COHN] down" and warned that COHN's "minion[s]" would look for opportunities to "hammer" her.

844. After plaintiff rejected DOMINGUEZ's unwanted sexual attention and refused to participate in the sexualized relationship he attempted to cultivate, DOMINGUEZ shifted from repeated attention and proximity to coldness, professional hostility, public discussion of plaintiff's discipline, manufactured workplace conflicts, humiliation, false narratives, and attacks upon her professional standing.

845. Plaintiff contemporaneously disclosed to Sergeant Albergo that she believed she had been removed from High-Tech because she refused to reciprocate DOMINGUEZ's sexual advances.

846. Plaintiff was subjected to approximately one year on the midnight tour despite seeking movement to another tour.

847. PBA Delegate Worch questioned what plaintiff had done to "piss off" COHN because COHN would not move her from midnights.

848. PBA Delegate Rusin thereafter relayed COHN's statement that if plaintiff wanted to get off midnights she needed to "bring [COHN] activity."

849. Plaintiff alleges that the assignment changes, Command Disciplines, targeted scrutiny, public humiliation, professional undermining, removal from High Tech, prolonged midnight assignment, and continued command interference were reasonably likely to deter a person from opposing discrimination or sexual harassment.

850. Plaintiff alleges that defendants undertook those acts because plaintiff rejected unwanted sexual attention, opposed sexually discriminatory workplace conduct, and refused to submit to the sexually hostile workplace environment.

851. COHN and DOMINGUEZ personally participated in the retaliatory conduct directed toward plaintiff.

852. BRUNO and ISLAM aided, abetted, enabled, or participated in the retaliation through selective disciplinary and compliance enforcement.

853. Each other individual defendant who aided, abetted, incited, compelled, coerced, enabled, or actually participated in retaliatory conduct is individually liable under Administrative Code § 8-107(6).

854. Defendants thereby violated Administrative Code § 8-107(7) and (6).

855. As a direct and proximate result, plaintiff suffered economic and non-economic damages, including emotional distress, anxiety, sleep disruption, professional injury, housing instability, and other consequential losses.

NINTH CAUSE OF ACTION
Gender-Motivated Violence in Violation of the New York City Victims of Gender-
Motivated Violence Protection Law
Administrative Code §§ 10-1103 and 10-1104
Against Defendant ELIZABETH OLIVERO and All Defendants Who Directed, Enabled,
Participated In, or Conspired in the Gender-Motivated Violence

856. Plaintiff repeats and realleges each preceding paragraph as though fully set forth herein.

857. On August 19, 2026, defendant ELIZABETH OLIVERO intentionally approached plaintiff from behind inside PSA 7 and grabbed plaintiff's left buttock without consent, warning, invitation, or legitimate workplace purpose.

858. OLIVERO's touching was intentional and involved an intimate part of plaintiff's body.

859. Immediately after grabbing plaintiff, OLIVERO laughed and stated, in substance, "that was me."

860. OLIVERO thereafter followed plaintiff outside and stated, in substance, "Oh my God, I thought you was gonna fuck me up! That's why I said it was me."

861. OLIVERO's statements demonstrated her awareness that the touching was intentional, unwanted, and sufficiently offensive to provoke an immediate angry response.

862. Plaintiff alleges that OLIVERO intentionally and forcibly touched plaintiff's buttock for the purpose of degrading or abusing plaintiff and/or gratifying sexual desire, thereby committing Forcible Touching in violation of Penal Law § 130.52(1).

863. Forcible Touching is a misdemeanor against the person and therefore constitutes a "crime of violence" within the meaning of Administrative Code § 10-1103, regardless of whether OLIVERO has been criminally charged, prosecuted, or convicted.

864. Plaintiff alleges that OLIVERO committed the foregoing crime of violence because of and on the basis of plaintiff's gender and that OLIVERO's conduct was motivated, at least in part, by animus based upon plaintiff's gender.

865. OLIVERO's conduct therefore constituted a "crime of violence motivated by gender" within the meaning of Administrative Code § 10-1103.

866. Plaintiff was the direct victim of OLIVERO's gender-motivated violence and suffered physical invasion, humiliation, emotional distress, anger, anxiety, and other injuries as a direct and proximate result.

867. Pursuant to Administrative Code § 10-1104, plaintiff is entitled to recover compensatory and punitive damages, injunctive and declaratory relief, attorneys' fees and costs, and all other relief the Court deems appropriate.

868. No criminal complaint, prosecution, or conviction is required to maintain plaintiff's civil claim under the Gender-Motivated Violence Protection Law.

JURY TRIAL

869. Plaintiff DELINDA N. GIRALDO hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

870. WHEREFORE, DELINDA N. GIRALDO respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, JEFFREY B. MADDREY, EDWARD A. THOMPSON, JOSEPH A. DIBARTOLOMEO, ELTON D. COHN, ALEXANDRU O. ANGHEL, ANTHONY A. BRUNO, FERNANDO DOMINGUEZ, ATICKUL ISLAM, MOHAMMAD ABDELFATTAH, and ELIZABETH OLIVERO jointly and severally where permitted by law, as follows:

- a. Declaring that defendants violated plaintiff's rights under the New York State Human Rights Law, Executive Law § 296, by subjecting her to sexual harassment and sex discrimination, race, ethnicity, and national-origin discrimination, hostile-work-environment discrimination, retaliation, and aiding and abetting;
- b. Declaring that defendants violated plaintiff's rights under the New York City Human Rights Law, Administrative Code § 8-107, by treating her less well because of her protected characteristics, subjecting her to sexual harassment and discrimination, race, ethnicity, and national-origin discrimination, a hostile work environment, retaliation, and aiding and abetting;
- c. Declaring that defendant ELIZABETH OLIVERO, and any other defendant proven to have directed, enabled, participated in, or conspired in the commission of the gender-motivated violence alleged herein, violated plaintiff's rights under the New York City Victims of Gender-Motivated Violence Protection Law, Administrative Code §§ 10-1101 through 10-1107;

- d. Awarding plaintiff compensatory damages in an amount to be determined at trial;
- e. Awarding plaintiff damages for emotional distress, humiliation, embarrassment, anxiety, fear, sleep disruption, loss of dignity, loss of workplace safety, loss of professional confidence, reputational harm, disruption of her personal and home life, and other non-economic injuries in an amount to be determined at trial;
- f. Awarding plaintiff back pay, front pay, lost wages, lost overtime, lost benefits, pension-related losses, housing-related economic losses, and other consequential economic damages caused by defendants' unlawful conduct, where applicable and in an amount to be determined at trial;
- g. Awarding punitive damages against the individually named defendants to the fullest extent permitted under the New York State Human Rights Law, the New York City Human Rights Law, the New York City Victims of Gender-Motivated Violence Protection Law, and other applicable law;
- h. Awarding plaintiff pre-judgment interest and post-judgment interest to the fullest extent permitted by law;
- i. Awarding plaintiff reasonable attorneys' fees, costs, expenses, and disbursements pursuant to the New York State Human Rights Law, the New York City Human Rights Law, the New York City Victims of Gender-Motivated Violence Protection Law, and any other applicable law;
- j. Entering injunctive relief requiring defendants to cease and desist from engaging in sexual harassment, sex discrimination, race, ethnicity, and national-origin discrimination, hostile-work-environment conduct, retaliation, aiding and

abetting, gender-motivated violence, and other unlawful employment practices against plaintiff;

- k. Entering injunctive relief requiring defendants to remove, correct, expunge, seal, or otherwise neutralize any retaliatory, discriminatory, selectively imposed, unsupported, or improperly maintained Command Disciplines, body-worn-camera compliance records, assignment records, tour records, performance-related documentation, disciplinary documentation, personnel records, or other employment records arising from or connected to the unlawful conduct alleged herein;
- l. Entering injunctive relief requiring defendants to restore plaintiff, to the extent practicable, to the terms, conditions, privileges, assignments, tours, opportunities, command standing, overtime opportunities, and employment benefits she would have enjoyed absent defendants' unlawful conduct;
- m. Entering injunctive relief requiring THE CITY OF NEW YORK and the NYPD to take effective corrective measures to prevent the circulation, display, redistribution, or workplace use of coerced or nonconsensual sexually explicit material involving members of service and to prevent such material from being used to sexually degrade, humiliate, ridicule, or retaliate against female employees;
- n. Entering injunctive relief requiring THE CITY OF NEW YORK and the NYPD to take effective corrective measures concerning sexual boundary violations, unwanted sexual touching, supervisory sexual grooming, sexualized workplace

conduct, and retaliation against employees who reject, resist, report, or oppose such conduct;

- o. Entering injunctive relief prohibiting defendants and their agents, employees, supervisors, executives, officers, representatives, and all persons acting in concert with them from retaliating against plaintiff for filing, prosecuting, participating in, or supporting this action or for otherwise opposing discrimination, sexual harassment, gender-motivated violence, or other unlawful employment practices;
- p. Awarding plaintiff all compensatory and punitive damages, attorneys' fees, costs, declaratory relief, injunctive relief, and other remedies authorized by Administrative Code § 10-1104 for the gender-motivated violence alleged herein; and
- q. Awarding such other and further legal, equitable, declaratory, and injunctive relief as this Court deems just, proper, and equitable.

Dated: August 20, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DELINDA N. GIRALDO

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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: August 20, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff DELINDA N. GIRALDO

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DELINDA N. GIRALDO

Plaintiff,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, JEFFREY
B. MADDREY, EDWARD A. THOMPSON, JOSEPH A.
DIBARTOLOMEO, ELTON D. COHN, ALEXANDRU O.
ANGHEL, ANTHONY A. BRUNO, FERNANDO
DOMINGUEZ, ATICKUL ISLAM, MOHAMMAD
ABDELFATTAH, and ELIZABETH OLIVERO

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff DELINDA N. GIRALDO

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