SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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SHEILA M. NUNEZ-LOPEZ

Plaintiff,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO

Defendants

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Summons

Index No.

Jury Demand

To the above-named Defendants:

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

If this Summons and Verified Complaint are personally delivered to you within the State of New York, you must serve your answer within twenty (20) days after service, exclusive of the day of service.

If service is made upon you in a manner for which the New York Civil Practice Law and Rules provides a thirty-day period to appear, you must serve your answer within thirty (30) days after service is complete.

If you fail to appear, answer, or otherwise respond within the time prescribed by law, judgment may be entered against you by default for the relief demanded in the Verified Complaint.

Venue is proper in Bronx County pursuant to CPLR §§ 503(a) and 504(3). Plaintiff SHEILA M. NUNEZ-LOPEZ resides in Bronx County, and a substantial part of the events and

omissions giving rise to this action occurred in Bronx County. CPLR § 503(a) permits venue where a party resides or where a substantial part of the events or omissions giving rise to the claim occurred, while CPLR § 504(3) places an action against the City of New York in the county within the City where the cause of action arose.

On August 24, 2025, plaintiff was involved in a domestic incident at her residence in Bronx County. Members and supervisory personnel of the New York City Police Department responded to that location. After learning that plaintiff was herself a New York City police officer, defendants escalated the matter through the Department's supervisory, Internal Affairs, suspension, and disciplinary processes. Plaintiff was thereafter arrested and suspended from duty.

Within days, NYPD generated a Domestic Incident Report identifying plaintiff as the victim/deponent and Andres Alejandro Ruiz Blanco as the suspect in a domestic-violence incident. Nevertheless, plaintiff alleges that defendants continued to subject her to adverse employment actions arising from the same domestic relationship and failed to meaningfully recognize, investigate, or account for her status as a victim of domestic violence.

The criminal charges arising from the August 24, 2025 incident were subsequently dismissed and sealed pursuant to CPL 160.50 on October 14, 2025. Plaintiff alleges that defendants thereafter continued to rely upon, consider, or permit the dismissed criminal accusations and arrest-related circumstances to affect her employment and disciplinary status, culminating in her separation from the New York City Police Department.

This action seeks relief under the New York State Human Rights Law and the New York City Human Rights Law for discrimination based upon plaintiff's arrest record and terminated

criminal accusations and discrimination based upon plaintiff's actual or perceived status as a victim of domestic violence.

Dated: September 24, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SHEILA M. NUNEZ-LOPEZ

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DEFENDANT ADDRESSES

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c/o New York City Law Department
Office of the Corporation Counsel
100 Church Street
New York, New York 10007

JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, PAWEL MASLINSKI, and JOSEPH M. CHARNECO
c/o New York City Police Department
Legal Bureau
One Police Plaza
New York, N.Y. 10038

KHALEEQ A. MIDDLETON
c/o New York City Police Department
Police Service Area No. 7
737 Melrose Avenue
Bronx, N.Y. 10455

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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SHEILA M. NUNEZ-LOPEZ

Plaintiff,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO

Defendants

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Verified Complaint

Index No.

Jury Demand

Plaintiff SHEILA M. NUNEZ-LOPEZ, by her attorney THE SANDERS FIRM, P.C., complaining of defendants THE CITY OF NEW YORK, JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO, alleges as follows:

INTRODUCTION

This action arises from the New York City Police Department's discriminatory treatment of plaintiff SHEILA M. NUNEZ-LOPEZ after a sixteen-month relationship marked by coercion, control, sexual pressure, threats to her career, physical violence, and plaintiff's repeated efforts to remove Andres Alejandro Ruiz Blanco from her life.

Plaintiff first began communicating with Ruiz in April 2024, the same month she entered the NYPD Police Academy. Ruiz, a Venezuelan national whom plaintiff knew from Food Bazaar, repeatedly discussed his immigration situation, his fear of deportation, and his concern that he might never see his family in Venezuela again. Plaintiff understood that Ruiz lacked

lawful authorization to work in the United States, and his immigration status became a constant subject of conversation. Over time, plaintiff came to believe that Ruiz's interest in her was not merely romantic, but that he intended to use their relationship and her United States citizenship as a means to obtain lawful immigration status and remain in this country.

The relationship became increasingly controlling almost immediately. Ruiz monitored plaintiff's schedule, repeatedly called and texted her while she was in the Police Academy, demanded information about her classmates and friends, appeared at her home and around her vehicle when she attempted to distance herself, and pressured her to remain in constant communication with him. Plaintiff repeatedly attempted to end the relationship, but Ruiz would arrive at her home crying, begging, and insisting that she was the only person he had in the United States.

By early 2025, plaintiff alleges that the relationship had become sexually coercive and emotionally abusive. She increasingly avoided going home, remained at work, volunteered for overtime, and spent extended periods at the gym because she did not want physical or sexual contact with Ruiz. Plaintiff alleges that Ruiz repeatedly demanded sexual intimacy even when she did not want it, and that she sometimes submitted because she feared his anger, retaliation, and what he might do to her career.

In May 2025, Ruiz proposed marriage. Plaintiff alleges that she did not want to marry him and did not love him in the way she believed necessary for marriage, but accepted because she felt pressured and feared his reaction. She further alleges that Ruiz repeatedly pushed for an immediate marriage and that, by then, she had come to believe his urgency was tied to his immigration status and his desire to obtain legal status through her.

By July 2025, plaintiff wanted Ruiz out of her apartment and out of her life. Ruiz refused to accept that decision and told her that he knew how to hurt her and her career. During one confrontation, while plaintiff was attempting to remove him from the apartment, Ruiz pulled a bedroom door, causing plaintiff to fall and sustain bruising. Plaintiff photographed those injuries the following day at the 30th Precinct but did not report the abuse. She remained silent because she feared retaliation, professional embarrassment, damage to her probationary NYPD career, and the consequences of exposing her private domestic circumstances to Department management.

By August 2025, plaintiff was actively trying to end the relationship. She disclosed portions of what she was experiencing to a female coworker at the 30th Precinct, avoided being home with Ruiz, and continued resisting his demands for marriage and sexual contact. Ruiz, meanwhile, regularly waited outside the 30th Precinct after plaintiff's tours and continued telling her that she was not going to leave him. Plaintiff alleges that Ruiz knew she was afraid of what he could do to her career and repeatedly exploited that fear.

The relationship culminated on August 24, 2025. During an argument at plaintiff's Bronx residence, plaintiff repeatedly told Ruiz that she would not marry him. Ruiz responded that plaintiff would "pay" for the emotional harm she had caused him and announced that he was calling the police. Plaintiff maintains that Ruiz then used the police response as the mechanism he had previously threatened to use against her career. When responding officers arrived, plaintiff did not identify herself as an NYPD officer, did not make a cross-complaint, and did not disclose the history of abuse because she feared what the Department would do to her career and feared the collateral consequences to her daughter and family.

Once NYPD personnel learned that plaintiff was herself a police officer, the matter immediately escalated through the Department's supervisory chain. Sergeant KHALEEQ A. MIDDLETON served as Patrol Supervisor. Duty Captain ABRAHAM BADILLO responded, interviewed Ruiz, and conferred with Duty Inspector JEFFREY M. HEILIG. Plaintiff was suspended under the authority of Citywide Duty Chief DAVID A. WALL. Sergeants PAWEL MASLINSKI and JOSEPH M. CHARNECO of Internal Affairs Bureau Group 9 participated in the Departmental response and processing. Badillo thereafter recommended that plaintiff's commanding officer confer with the Department Advocate's Office regarding Charges and Specifications and that the appropriate investigative unit monitor plaintiff's criminal proceedings and formally interview her after the criminal case concluded.

The Department then converted the domestic incident into formal disciplinary charges. On September 3, 2025, NYPD issued Charges and Specifications accusing plaintiff of prohibited conduct for allegedly assaulting Ruiz and separately accusing her of prohibited conduct because she failed to identify herself as an NYPD member to the responding officers. Inspector NEIL W. ZUBER signed the Charges and Specifications, and Deputy Chief ERIC PAGAN subsequently endorsed their issuance.

But the Department's own records soon contradicted the premise on which plaintiff had been treated. On August 29, 2025—only five days after her arrest and suspension—NYPD generated a Domestic Incident Report expressly identifying SHEILA M. NUNEZ-LOPEZ as the "Victim/Deponent" and Andres Alejandro Ruiz Blanco as the "Suspect." On October 14, 2025, the criminal charges arising from the August 24 incident were dismissed and sealed pursuant to CPL 160.50.

Despite possessing an official record identifying plaintiff as the victim of domestic violence, and despite the dismissal and sealing of the criminal accusations against her, NYPD continued to subject plaintiff to adverse employment consequences arising from the same domestic relationship and arrest. She remained on modified duty, underwent Departmental domestic-violence programming, remained under investigation, and was ultimately terminated from the NYPD in September 2026.

Plaintiff brings this action under the New York State Human Rights Law and the New York City Human Rights Law for discrimination based upon her arrest record and terminated criminal accusations and discrimination based upon her actual or perceived status as a victim of domestic violence. The central contradiction is stark: NYPD disciplined plaintiff as a domestic-violence offender while possessing its own official record identifying her as the victim, and continued to burden her employment after the criminal case against her had been dismissed and sealed.

JURISDICTION AND VENUE

1. This Court has subject-matter jurisdiction over this action pursuant to Article VI, § 7(a) of the New York State Constitution, which vests the Supreme Court with general original jurisdiction in law and equity.

2. Plaintiff brings claims for unlawful employment discrimination under the New York State Human Rights Law, Executive Law §§ 290 et seq., including discrimination based upon plaintiff's arrest record and terminated criminal accusations and discrimination based upon plaintiff's status as a victim of domestic violence.

3. Pursuant to Executive Law § 297(9), a person aggrieved by an unlawful discriminatory practice may maintain a civil action in a court of appropriate jurisdiction, subject

to the statute's election-of-remedies provisions. Plaintiff has not filed a complaint concerning the unlawful discriminatory practices alleged herein with the New York State Division of Human Rights or any local commission on human rights and has therefore made no election of an administrative remedy that would preclude this action.

4. Plaintiff further brings claims under the New York City Human Rights Law, New York City Administrative Code §§ 8-101 et seq., including discrimination based upon plaintiff's arrest record and terminated criminal accusations and discrimination based upon plaintiff's actual or perceived status as a victim of domestic violence.

5. Pursuant to New York City Administrative Code § 8-502(a), a person aggrieved by an unlawful discriminatory practice prohibited by the New York City Human Rights Law may maintain a civil action in a court of competent jurisdiction. Plaintiff has not filed a complaint concerning the unlawful discriminatory practices alleged herein with either the New York City Commission on Human Rights or the New York State Division of Human Rights and is therefore not barred by the election-of-remedies provision contained in § 8-502(a).

6. This Court has personal jurisdiction over defendant THE CITY OF NEW YORK and the individual defendants because they reside, work, transact business, and/or committed the acts and omissions giving rise to this action within the State of New York and City of New York.

7. Venue is proper in Bronx County pursuant to CPLR §§ 503(a) and 504(3). Plaintiff resides in Bronx County, and a substantial part of the events and omissions giving rise to this action occurred in Bronx County. CPLR § 504(3) further provides that an action against the City of New York shall be tried in the county within the City in which the cause of action arose.

8. The August 24, 2025 domestic incident that precipitated defendants' challenged employment actions occurred at plaintiff's residence in Bronx County. NYPD officers and supervisory personnel responded there; plaintiff was arrested in Bronx County; and the incident was immediately escalated through NYPD's supervisory, Internal Affairs, suspension, and disciplinary processes.

9. On August 29, 2025, NYPD generated a Domestic Incident Report in connection with plaintiff's continuing domestic circumstances that expressly identified plaintiff as the "Victim/Deponent" and Andres Alejandro Ruiz Blanco as the "Suspect."

10. The criminal prosecution arising from the August 24, 2025 incident proceeded in Bronx County and, on October 14, 2025, the criminal charges against plaintiff were dismissed and sealed pursuant to CPL 160.50.

11. The Bronx County events formed the factual predicate for plaintiff's arrest record, the Department's treatment of her domestic-violence status, the NYPD Charges and Specifications, the continuing disciplinary process, and the adverse employment actions challenged herein. Accordingly, a substantial part of the conduct giving rise to plaintiff's claims occurred in Bronx County, and venue is proper in this Court.

PROCEDURAL REQUIREMENTS

12. Plaintiff has satisfied all procedural requirements necessary to maintain this action under the New York State Human Rights Law and the New York City Human Rights Law.

13. Plaintiff has not filed a complaint arising from the unlawful discriminatory practices alleged herein with the New York State Division of Human Rights or the New York City Commission on Human Rights and has therefore made no election of administrative

remedies that would bar this action under Executive Law § 297(9) or New York City Administrative Code § 8-502(a).

14. Plaintiff was not required to exhaust administrative remedies before commencing this action. Both Executive Law § 297(9) and New York City Administrative Code § 8-502(a) expressly authorize an aggrieved person to commence a civil action in a court of appropriate or competent jurisdiction, subject to their respective election-of-remedies provisions.

15. No notice of claim under General Municipal Law §§ 50-e or 50-i was required as a condition precedent to plaintiff's Human Rights Law claims against the CITY OF NEW YORK or the individual defendants. The Court of Appeals has held that Human Rights Law claims are not tort claims within General Municipal Law § 50-e and are not claims for personal injury, wrongful death, or property damage within General Municipal Law § 50-i. *Margerum v. City of Buffalo*, 24 N.Y.3d 721, 730 (2015).

16. The Appellate Division has likewise recognized that a plaintiff asserting Human Rights Law claims against the CITY OF NEW YORK is not required to serve a notice of claim pursuant to General Municipal Law §§ 50-e and 50-i. *Seifullah v. City of New York*, 161 A.D.3d 1206, 1207 (2d Dep't 2018).

17. This action is timely commenced. The discriminatory conduct alleged herein occurred beginning in 2025 and continued through plaintiff's termination from the NYPD in September 2026. Plaintiff's claims therefore fall within the applicable limitations' periods governing claims under the New York State and New York City Human Rights Laws. New York City Administrative Code § 8-502(d) provides a three-year limitations period for civil actions brought under the NYCHRL.

18. Within ten (10) days after commencement of this action, plaintiff will serve a copy of the Verified Complaint upon the representatives designated by the New York City Commission on Human Rights and the Corporation Counsel of the City of New York, as required by New York City Administrative Code § 8-502(c).

19. Plaintiff has therefore satisfied, or will timely satisfy upon commencement, all conditions precedent applicable to the claims asserted in this action.

PLAINTIFF

20. Plaintiff SHEILA M. NUNEZ-LOPEZ is a natural person and resident of Bronx County, New York.

21. Plaintiff was appointed to the New York City Police Department as a Police Officer on April 24, 2024. She entered the Police Academy that same day and graduated from the Academy in October 2024.

22. Following graduation, plaintiff was assigned to the 30th Precinct, where she performed patrol and Field Training Unit duties, responded to calls for service, interacted with members of the public, and worked substantial overtime while supporting herself and her daughter.

23. In or about August 2025, plaintiff was being transferred from the 30th Precinct to the 19th Precinct when the domestic incident involving Andres Alejandro Ruiz Blanco occurred at plaintiff's Bronx residence.

24. At the time of that incident, plaintiff was a probationary Police Officer and was simultaneously experiencing an abusive domestic relationship that she had largely concealed from NYPD management because she feared professional judgment, retaliation, discipline, and damage to the career she had worked to establish.

25. Plaintiff's fear was not abstract. During the relationship, Ruiz repeatedly threatened plaintiff's career, told her that he knew how to hurt her and her career, appeared at or near her workplace, pressured her to remain in the relationship and marry him, and used plaintiff's concern for her NYPD employment as a means of maintaining control over her. Plaintiff repeatedly attempted to distance herself from Ruiz while continuing to perform her duties as a Police Officer.

26. Following the August 24, 2025 incident, plaintiff was arrested, suspended, placed on modified duty, and subjected to NYPD disciplinary proceedings arising from the same domestic relationship in which NYPD subsequently documented plaintiff as the victim of domestic violence.

27. Plaintiff thereafter worked on modified duty at Manhattan Central Booking for nearly one year, during which her coworkers and supervisors had the opportunity to observe her work performance, conduct, and continued commitment to her employment.

28. On or about September 4, 2026, plaintiff's employment with the NYPD was terminated by order of the Police Commissioner. Plaintiff alleges that her termination and the adverse employment actions preceding it were unlawfully influenced by her arrest record and terminated criminal accusations, and by her actual or perceived status as a victim of domestic violence.

DEFENDANTS

29. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York. At all relevant times, the City of New York was plaintiff's employer and acted through the New York City Police Department, its officers, supervisors, managers, investigators, and policymakers.

30. At all relevant times, defendant JESSICA S. TISCH was the Police Commissioner of the New York City Police Department and exercised final authority over plaintiff's continued employment as a probationary Police Officer. On or about September 4, 2026, TISCH approved plaintiff's termination from the NYPD. Plaintiff sues TISCH in her individual and official capacities based upon her personal participation in the ultimate adverse employment decision challenged herein.

31. At all relevant times, defendant DAVID A. WALL was a Deputy Chief of the NYPD and was serving as the Citywide Duty Chief during the August 24, 2025 domestic incident involving plaintiff and Andres Alejandro Ruiz Blanco. The Department's own records reflect that plaintiff was suspended from duty under WALL's authority following the domestic incident and resulting arrest. Plaintiff sues WALL in his individual and official capacities based upon his personal participation in the decision to impose an immediate adverse employment consequence arising from the domestic incident.

32. At all relevant times, defendant ERIC PAGAN was a Deputy Chief of the NYPD and served as Executive Officer of Patrol Borough Manhattan North. On September 22, 2025, PAGAN personally reviewed and expressly concurred with the issuance of the Charges and Specifications against plaintiff arising from the August 24, 2025 domestic incident. By that time, the Department had already documented plaintiff as the "Victim/Deponent" and Ruiz as the "Suspect" in its August 29, 2025 Domestic Incident Report. Plaintiff sues PAGAN in his individual and official capacities based upon his direct participation in reviewing, approving, and continuing the Departmental disciplinary process against plaintiff.

33. At all relevant times, defendant JEFFREY M. HEILIG was a Deputy Inspector of the NYPD and was serving as the Duty Inspector during the August 24, 2025 incident. Duty

Captain Abraham Badillo conferred with HEILIG during the supervisory response before plaintiff was suspended. Plaintiff sues HEILIG in his individual and official capacities based upon his participation in the command-level decision-making concerning plaintiff's arrest, suspension, and employment status.

34. At all relevant times, defendant NEIL W. ZUBER was an Inspector of the NYPD and served as the Commanding Officer of the 19th Precinct. Following the August 24, 2025 domestic incident, ZUBER participated directly in the disciplinary process concerning plaintiff. On September 3, 2025, ZUBER signed and authorized the formal Charges and Specifications accusing plaintiff of prohibited conduct arising from the domestic incident, including the allegation that she assaulted Andres Alejandro Ruiz Blanco and the separate allegation that she failed to identify herself as a member of the NYPD to responding officers. ZUBER authorized those disciplinary charges after the Department had already generated the August 29, 2025 Domestic Incident Report identifying plaintiff as the "Victim/Deponent" and Ruiz as the "Suspect." Plaintiff sues ZUBER in his individual and official capacities based upon his direct participation in the decision to formalize and pursue disciplinary charges against plaintiff.

35. At all relevant times, defendant ABRAHAM BADILLO was a Captain of the NYPD and was serving as the Duty Captain during the August 24, 2025 incident. After NYPD personnel learned that plaintiff was herself a Police Officer, BADILLO responded to the scene, interviewed Ruiz, conducted the supervisory investigation, conferred with HEILIG, participated in plaintiff's suspension, and prepared the Departmental report recommending that plaintiff's command confer with the Department Advocate's Office regarding Charges and Specifications and that the appropriate investigative unit monitor the criminal proceedings and formally interview plaintiff thereafter. Plaintiff sues BADILLO in his individual and official capacities

based upon his direct participation in the investigation, suspension, and initiation of the disciplinary process.

36. At all relevant times, defendant KHALEEQ A. MIDDLETON was a Sergeant of the NYPD and served as the Patrol Supervisor responding to plaintiff's Bronx residence on August 24, 2025. MIDDLETON supervised the initial police response, directed plaintiff's arrest, and, after learning that plaintiff was an NYPD officer, escalated the incident to the Department's command structure. Plaintiff sues MIDDLETON in his individual and official capacities based upon his direct participation in the police and employment-related actions arising from the domestic incident.

37. At all relevant times, defendant PAWEL MASLINSKI was a Sergeant assigned to the NYPD Internal Affairs Bureau, Group 9. MASLINSKI responded during the Departmental processing of plaintiff following the August 24, 2025 incident and participated in the Internal Affairs response arising from plaintiff's arrest and suspension. Plaintiff sues MASLINSKI in his individual and official capacities based upon his participation in the Internal Affairs investigation and employment process concerning plaintiff.

38. At all relevant times, defendant JOSEPH M. CHARNECO was a Sergeant assigned to the NYPD Internal Affairs Bureau, Group 9. CHARNECO responded during the Departmental processing of plaintiff following the August 24, 2025 incident and participated in the Internal Affairs response arising from plaintiff's arrest and suspension. Plaintiff sues CHARNECO in his individual and official capacities based upon his participation in the Internal Affairs investigation and employment process concerning plaintiff.

39. By August 29, 2025, NYPD possessed a formal Domestic Incident Report identifying plaintiff as the "Victim/Deponent" and Ruiz as the "Suspect." Plaintiff alleges that

the supervisory, managerial, and Internal Affairs defendants knew, should have known through the Departmental investigation, or subsequently became aware that plaintiff was herself being identified by NYPD as a victim of domestic violence, yet failed to meaningfully reassess the employment consequences imposed upon her.

40. On October 14, 2025, the criminal charges arising from the August 24, 2025 incident were dismissed and sealed pursuant to CPL 160.50. Plaintiff alleges that defendants thereafter continued to participate in, maintain, facilitate, or permit adverse employment treatment arising from the arrest, criminal accusations, and domestic incident notwithstanding the favorable termination and sealing of the criminal case.

41. Each individual defendant personally participated in, authorized, approved, facilitated, condoned, or failed to take corrective action concerning one or more of the discriminatory employment practices alleged herein and is therefore subject to individual liability, including aiding-and-abetting liability, under Executive Law § 296(6) and New York City Administrative Code § 8-107(6), to the extent established by the evidence.

BACKGROUND

42. Before plaintiff ever met Andres Alejandro Ruiz Blanco, she had already survived a long-term abusive relationship with the father of her daughter. Plaintiff had been with him for approximately ten years and had been subjected to humiliation, verbal abuse, physical abuse, financial neglect, and repeated attacks on her dignity.

43. Plaintiff was spat on, kicked, punched in the face, called weak, and left to carry the financial and household responsibilities largely by herself.

44. Plaintiff worked multiple jobs, including DoorDash, Uber Eats, driving pursuant to a Taxi and Limousine Commission license, and working as an assistant manager at a

supermarket, while caring for her daughter, cooking, cleaning, helping with homework, and trying to maintain the household.

45. Plaintiff also endured the rejection of her daughter by members of the child's paternal family, who questioned whether plaintiff's daughter was biologically related to her father.

46. Plaintiff did not grow up with the kind of parental support system to which she could easily turn. She was raised by her grandmother in Honduras from approximately nine months old and entered adulthood accustomed to carrying hardship without having a mother or father available to protect or guide her.

47. By early 2024, plaintiff was emotionally exhausted, financially strained, and attempting to rebuild her life while raising her daughter and pursuing a career that she believed could finally provide stability.

48. On April 24, 2024, plaintiff entered the New York City Police Department Police Academy. At approximately the same time, plaintiff began communicating with Ruiz, whom she knew from Food Bazaar.

49. Ruiz was from Venezuela and worked at a supermarket. Plaintiff understood that he did not possess lawful documentation authorizing him to work in the United States.

50. From the beginning of their communications, Ruiz repeatedly spoke about his immigration status, his fear of deportation, his concern that he might never see his family in Venezuela again, and his frustration over his inability to build the life he wanted in the United States.

51. Ruiz also told plaintiff that he had wanted to become a police officer in Venezuela but that his parents had not allowed him to pursue that career.

52. Plaintiff disclosed to Ruiz what she had endured in her prior relationship, including the physical and emotional abuse, the financial strain, and the burden of raising her daughter largely by herself.

53. Ruiz therefore knew early in the relationship that plaintiff was emotionally vulnerable, financially stressed, beginning the Police Academy, and trying to establish a stable future for herself and her daughter.

54. Plaintiff alleges that, after learning these things, Ruiz spoke about his immigration problems constantly. His fear of deportation and his desire to remain in the United States became a recurring, almost daily subject of conversation.

55. Plaintiff increasingly believed Ruiz was indirectly communicating that he wanted her to do something about his immigration circumstances and that he viewed her as someone who could help him remain in the United States.

56. In May 2024, plaintiff and Ruiz became closer. Ruiz purchased flowers, cellular telephones, rings, and other expensive gifts.

57. Plaintiff questioned how Ruiz was able to afford those gifts while working only limited hours at a supermarket.

58. When plaintiff questioned him, Ruiz discouraged her inquiries and told her, in substance, that she should not ask a man how he managed to purchase gifts for her.

59. Plaintiff eventually began refusing some of the gifts because the circumstances surrounding the purchases made her uncomfortable.

60. At the same time, Ruiz's behavior became increasingly controlling.

61. While plaintiff was attending the Police Academy, Ruiz repeatedly called and texted her, including while she was in class.

62. Ruiz wanted to know who plaintiff's classmates were, what they looked like, who her friends were, where they lived, and where plaintiff was going when she was not at the Academy.

63. Ruiz attempted to control plaintiff's schedule and expected her to return directly home after Academy training.

64. He would travel from the Bronx to Queens to pick plaintiff up from the Academy and increasingly inserted himself into the routines surrounding her new career.

65. When plaintiff expressed a desire to spend time alone, Ruiz became emotional and told her how much he needed to be close to her.

66. Plaintiff began telling a male Police Academy classmate that something about Ruiz felt wrong and that she did not actually want a romantic relationship with him.

67. Plaintiff repeatedly tried to make clear to Ruiz that she did not want the relationship he was demanding.

68. When plaintiff attempted to create distance, Ruiz would appear at her home, wait around her vehicle before she left for the Academy, cry, beg her not to stop speaking to him, and pressure her to continue allowing him into her life.

69. By June 2024, plaintiff had made multiple attempts to stop communicating with Ruiz.

70. Ruiz responded by coming to plaintiff's home in the middle of the night, crying, getting on his knees, and telling plaintiff that she was the only person he had in this country.

71. He demanded that plaintiff promise never to leave him alone.

72. Plaintiff was simultaneously struggling through the Police Academy, facing eviction, paying for childcare, dealing with toll violations, managing her daughter's school obligations, and litigating child-support issues in Family Court.

73. Plaintiff failed her first TRI examination, after which the Police Academy interviewed her concerning the stressors she was experiencing.

74. Plaintiff disclosed that she was under substantial financial and personal pressure and facing eviction.

75. At the same time, Ruiz was already discussing children, a more formal relationship, and moving into plaintiff's residence even though they had known each other only a short period of time.

76. Plaintiff wanted stability, wanted to focus on her career, and increasingly wanted to be alone with her daughter.

77. Instead, she felt that getting Ruiz out of her life was becoming more difficult because he knew where she lived, where she trained, what vehicle she drove, her work schedule, and information concerning her daughter.

78. Plaintiff also feared involving NYPD personnel. She was just beginning her career and was afraid that disclosing that she was fearful of a man in her personal life would cause supervisors to scrutinize her, judge her, or place her employment at risk.

79. Plaintiff graduated from the Police Academy in October 2024.

80. Plaintiff initially did not want Ruiz to attend her graduation because she had a limited number of tickets and wanted to give them to family members and longtime friends who had supported her.

81. Ruiz became upset and made plaintiff feel guilty about excluding him.

82. Plaintiff ultimately gave Ruiz a graduation ticket because she felt pressured to put his feelings ahead of her own.

83. Plaintiff came to view that incident as another example of Ruiz manipulating her emotions until she abandoned a decision, she had made for herself.

84. In November 2024, plaintiff began working at the 30th Precinct.

85. During a Thanksgiving detail, plaintiff's NYPD uniform and shield became wet from the rain. Plaintiff placed them in a duffel bag inside Ruiz's vehicle while intending to wash and dry them.

86. Several hours later, plaintiff discovered that her NYPD shield and uniform were missing.

87. Ruiz also claimed that his passport and other personal belongings had been stolen from the vehicle.

88. Plaintiff and Ruiz reported the incident at the 49th Precinct.

89. Approximately one month later, Ruiz told plaintiff that someone had contacted him through Facebook and that some of his allegedly stolen belongings had been recovered.

90. Plaintiff's NYPD shield and uniform were never recovered.

91. Plaintiff found it suspicious that Ruiz's property was allegedly recovered while her department shield and uniform remained missing.

92. Although plaintiff could not prove what had happened, the incident deepened her distrust of Ruiz and caused her to question whether he may have been involved.

93. In January 2025, plaintiff's grandmother, who had raised her from infancy, became seriously ill in Honduras.

94. Plaintiff worked substantial overtime and sought additional employment opportunities so that she could send money to Honduras for medical appointments, treatment, medication, and other necessities.

95. Plaintiff was simultaneously carrying the responsibilities of motherhood, financial support, a new career as a police officer, and an increasingly controlling relationship with Ruiz.

96. By early 2025, plaintiff no longer wanted physical or sexual contact with Ruiz.

97. Plaintiff alleges that Ruiz nevertheless repeatedly pressured her to engage in sexual activity.

98. There were occasions when plaintiff did not want sexual contact but believed that refusing Ruiz would result in anger, argument, emotional pressure, or some other consequence.

99. Plaintiff therefore sometimes engaged in sexual contact that she did not want because she did not believe she could freely refuse him.

100. Plaintiff began working more, going to the gym almost every day, and finding reasons to stay away from Ruiz.

101. Plaintiff did not want to hold his hand, kiss him, go out with him, or continue acting as though she wanted the relationship.

102. Ruiz nevertheless continued purchasing flowers and gifts, making restaurant reservations, appearing near the 30th Precinct, and insisting that they belonged together.

103. Plaintiff disclosed some of what she was experiencing to a female coworker at the 30th Precinct, who repeatedly told plaintiff that the relationship was unhealthy and that she needed to leave before it damaged her career.

104. Ruiz simultaneously intensified his pressure concerning marriage.

105. Plaintiff alleges that Ruiz's urgency caused her to focus increasingly on his immigration circumstances.

106. Ruiz had repeatedly discussed deportation from the beginning of their relationship.

107. Plaintiff understood that Ruiz's purported work authorization was approaching expiration.

108. Plaintiff therefore came to believe that Ruiz wanted to marry her because she was a United States citizen and because marriage to her could provide him a means to obtain lawful immigration status and remain in the United States.

109. Plaintiff came to believe that Ruiz had selected her, at least in part, because he viewed her as someone who could secure his future in this country.

110. Plaintiff did not know with certainty what was in Ruiz's mind, but his repeated immigration concerns, relentless pressure for marriage, and efforts to accelerate the relationship caused her to question whether his motives were genuine.

111. In March 2025, plaintiff's grandmother died.

112. Plaintiff requested permission from the NYPD to travel to Honduras for the burial, and the Department granted the request.

113. By April 2025, plaintiff had been evicted from her residence and was living in a shelter with her daughter.

114. Plaintiff did not tell her coworkers or supervisors that she was homeless.

115. Plaintiff was ashamed and embarrassed about the situation and feared how NYPD personnel would view her if they learned that a newly appointed police officer was living in a shelter with her child.

116. Plaintiff was afraid that her personal instability would become workplace gossip, cause supervisors to judge her, or affect how she was viewed professionally.

117. Plaintiff therefore went to work each day while concealing the fact that she and her daughter would return to a shelter after her tour.

118. Plaintiff continued performing Field Training Unit duties, responding to jobs, assisting members of the public, and handling other people's emergencies while privately trying to manage her own homelessness.

119. Plaintiff worked every overtime opportunity she could because she was trying to accumulate enough money to get herself and her daughter out of the shelter.

120. Plaintiff wanted more than a place to sleep. She wanted to give her daughter a safe, stable, quiet home where the child would no longer have to live with the uncertainty and disruption of homelessness.

121. While plaintiff was living in the shelter, Ruiz attempted to involve himself in that living arrangement as well.

122. Ruiz wanted to stay with plaintiff and her daughter at the shelter.

123. Plaintiff did not want him there.

124. By then, plaintiff was already trying to distance herself from Ruiz and did not want him inserted into yet another part of her life.

125. Rather than directly confront him, plaintiff made excuses to prevent Ruiz from joining her because she was afraid of his reaction.

126. Ruiz became angry and accused plaintiff of not wanting to build a family with him.

127. Plaintiff perceived Ruiz's effort to join them at the shelter as another attempt to maintain control over her at a time when she was especially vulnerable.

128. Plaintiff believed that if Ruiz gained access to the shelter arrangement, he would have even greater access to her and her daughter and it would become even harder for her to establish boundaries.

129. When plaintiff did not answer Ruiz's telephone calls, Ruiz threatened to go to the 30th Precinct and stand outside until she answered.

130. Plaintiff was terrified that Ruiz would bring her personal relationship into her workplace, create a scene in front of coworkers and supervisors, and expose circumstances she had worked hard to keep private.

131. The domestic conflict also began affecting plaintiff's ability to report for duty on time.

132. Plaintiff and Ruiz would sometimes argue for hours before her scheduled tour, causing plaintiff on some occasions to arrive ten or fifteen minutes late.

133. Plaintiff nevertheless continued reporting to work, taking overtime, responding to jobs, and functioning as a police officer while privately feeling overwhelmed and trapped.

134. Plaintiff observed that other Department members also concealed personal and relationship problems rather than disclose them to management.

135. Those observations reinforced plaintiff's belief that silence was safer and that bringing domestic problems to supervisors could result in judgment, stigma, or damage to her career.

136. In May 2025, while plaintiff was still grieving the death of her grandmother, struggling financially, and dealing with housing instability, Ruiz arranged a helicopter marriage proposal in New Jersey.

137. Plaintiff did not want to marry Ruiz.

138. Plaintiff did not believe that she loved Ruiz in the manner in which she believed a person should love someone she intended to marry.

139. Plaintiff nevertheless said yes because she felt enormous pressure, did not want to provoke Ruiz, and was afraid of how he would react if she refused.

140. Plaintiff has described the decision as one she made against her own will and wishes.

141. That same night, plaintiff and Ruiz returned to a hotel.

142. Plaintiff alleges that Ruiz again pressured her into sexual activity.

143. Plaintiff said “no” at points, did not want the contact, did not desire it, and did not enjoy it.

144. Plaintiff nevertheless felt compelled to continue because she feared Ruiz’s anger, insults, questioning, guilt, and reaction if she refused.

145. Plaintiff also felt pressure because Ruiz had spent substantial money on the proposal and she believed he would make her feel that she owed him something in return.

146. Plaintiff alleges that there were multiple occasions during the relationship when she participated in sexual activity she did not want because she did not feel free to refuse Ruiz without consequences.

147. By June 2025, plaintiff was working substantial overtime and spending long periods at the gym because both places allowed her to avoid Ruiz.

148. Plaintiff began lifting heavy weights because she wanted to feel physically stronger and less vulnerable.

149. She wanted to feel that no one could touch, hurt, or control her again.

150. Ruiz, meanwhile, became increasingly jealous, possessive, and demanding of plaintiff's attention.

151. He repeatedly called and texted plaintiff while she was working.

152. Plaintiff sometimes volunteered for overtime or stayed at the gym longer specifically because she did not want to return home and deal with Ruiz.

153. Work and the gym became places where plaintiff could temporarily escape him.

154. Plaintiff continued to keep the full extent of what was happening from NYPD management.

155. On or about June 6, 2025, plaintiff finally obtained a one-bedroom NYCHA apartment for herself and her daughter.

156. Plaintiff viewed the apartment as an opportunity to leave the shelter behind and finally create the stable home she had been working toward.

157. Plaintiff did not want her coworkers or supervisors to know that she had been homeless, lived in a shelter, or moved into NYCHA housing.

158. Plaintiff associated those circumstances with stigma and feared that other officers would look at her differently.

159. Plaintiff disclosed her address to NYPD only because she understood that Department rules required her to update her residence information.

160. Plaintiff wanted the apartment to belong to her and her daughter and did not want Ruiz living there.

161. Ruiz immediately pressured plaintiff to let him move into the apartment.

162. Ruiz told plaintiff that they were engaged, that living together made sense, and that he would pay one-half of the rent.

163. Plaintiff was still financially strained and trying to support her daughter.

164. Ruiz's promise to contribute to the rent placed additional pressure on plaintiff despite the fact that she did not want him in the apartment.

165. Plaintiff eventually allowed Ruiz to move in not because she wanted to live with him, but because she felt pressured, financially vulnerable, and afraid of what would happen if she told him no.

166. Plaintiff quickly regretted that decision. The apartment she had fought to obtain as a fresh start for herself and her daughter became another place in which she felt controlled.

167. By July 2025, plaintiff no longer wanted any relationship with Ruiz and repeatedly told him that she wanted him out of the apartment.

168. Ruiz had promised to contribute one-half of the rent but did not consistently do so.

169. Plaintiff was already working long hours and overtime to support herself and her daughter, and Ruiz's failure to contribute increased the financial pressure.

170. Ruiz refused to accept plaintiff's efforts to end the relationship.

171. When plaintiff told Ruiz to leave, he threatened her career.

172. Ruiz told plaintiff that he knew how to hurt her and knew how to hurt her career.

173. Plaintiff took those threats seriously because she was a probationary NYPD officer and Ruiz knew how much the career meant to her.

174. Plaintiff had worked too hard to become a police officer to dismiss threats that Ruiz would somehow use her personal circumstances against her.

175. During one confrontation in July 2025, plaintiff attempted to remove Ruiz from the apartment.

176. Plaintiff opened the bedroom door.

177. Ruiz grabbed the door and pulled it in the opposite direction.

178. Plaintiff fell to the floor and sustained bruising.

179. Ruiz later apologized and claimed that he had not intended to hurt her.

180. Plaintiff did not call the police.

181. Plaintiff did not notify NYPD management.

182. The following day, plaintiff went into a bathroom at the 30th Precinct and photographed the bruises on her body so that she would have a record of what Ruiz had done.

183. Plaintiff then covered the bruises with her uniform and went back to work.

184. Plaintiff remained silent because she was afraid of retaliation, afraid of becoming part of a department scandal, afraid of losing her career, and unsure whom within NYPD she could safely trust.

185. Plaintiff was also reluctant to expose Ruiz to law-enforcement consequences because she knew that he had immigration problems and feared what police involvement could do to him.

186. Plaintiff felt trapped between wanting Ruiz out of her home and fearing the consequences of taking steps to force him out.

187. She continued responding to other people's emergencies while hiding what was happening inside her own home.

188. By August 2025, plaintiff's efforts to avoid Ruiz had become constant.

189. Plaintiff did not want Ruiz touching her.

190. She did not want sexual contact with him.

191. She did not want to remain engaged to him.

192. She did not want him living in her home.

193. Plaintiff sometimes sent her daughter to stay with a close friend so that the child would not be around the conflict.

194. Plaintiff remained at work longer, stayed at the gym longer, and found other reasons not to return home.

195. Plaintiff disclosed more of the situation to a female coworker at the 30th Precinct, who again warned plaintiff that she needed to leave Ruiz before the relationship destroyed her career.

196. Ruiz purchased a ring band for plaintiff to wear at work after plaintiff resisted wearing the engagement ring.

197. Plaintiff did not want to wear either one.

198. When plaintiff returned home without the ring or band on her finger, Ruiz became angry and accused her of being interested in someone else.

199. Plaintiff alleges that Ruiz knew by then that she did not love him, knew she wanted the relationship to end, and knew that plaintiff's fear for her career was one of the principal reasons she had not more forcefully removed him from her life.

200. Ruiz continued telling plaintiff, in substance, that she was not going to leave him, that he wanted to marry her, and that he wanted her to belong to him.

201. Ruiz regularly waited outside the 30th Precinct to pick plaintiff up after her tours, conduct that plaintiff's coworkers observed.

202. During the overnight hours of August 24 into August 25, 2025, plaintiff and Ruiz became involved in another argument inside plaintiff's Bronx apartment.

203. Plaintiff was then under substantial stress because she was being transferred to the 19th Precinct and because Ruiz was not consistently contributing toward the rent.

204. Ruiz accused plaintiff of spending too much time at work and of having a relationship with a coworker.

205. Plaintiff told Ruiz to leave.

206. Plaintiff made clear that she did not want him remaining in the apartment and did not want the relationship to continue.

207. While they were in the bedroom, plaintiff used her feet to push Ruiz off the bed because she wanted him to get up and leave.

208. Plaintiff has consistently denied assaulting Ruiz.

209. During the argument, plaintiff finally told Ruiz unequivocally that she was not going to marry him.

210. Plaintiff told Ruiz approximately twenty times, "I'm not marrying you."

211. Plaintiff confronted Ruiz about his repeated pressure to rush into marriage.

212. Ruiz had previously made appointments at court without consulting plaintiff and expected plaintiff simply to appear and execute marriage paperwork.

213. Plaintiff had repeatedly resisted those efforts because she did not want to marry Ruiz and had become increasingly convinced that his urgency was tied to his immigration circumstances.

214. By then, plaintiff believed Ruiz viewed her United States citizenship as the means through which he could obtain lawful immigration status and remain in the United States.

215. Ruiz became extremely upset when plaintiff finally and unequivocally rejected marriage.

216. Ruiz told plaintiff that she would "pay" for the emotional damage she had caused him.

217. Ruiz then stated, in substance, "Watch, I'm calling the cops on you. You will pay for this."

218. Approximately five minutes later, Ruiz called 911.

219. NYPD officers responded to plaintiff's apartment.

220. Plaintiff told the responding officers that she and Ruiz had been involved in a verbal dispute.

221. Plaintiff did not initially identify herself as an NYPD officer.

222. Plaintiff did not make an immediate cross-complaint against Ruiz.

223. Plaintiff did not tell the responding officers about the July incident in which Ruiz had caused her to fall and bruise herself.

224. Plaintiff did not tell them that she had photographed those injuries at the 30th Precinct.

225. Plaintiff did not disclose the months of threats to her career, coercive control, unwanted sexual pressure, unwanted physical contact, repeated efforts to force a marriage, appearances at her workplace, or her fear that Ruiz would retaliate if she finally ended the relationship.

226. Plaintiff remained silent because she was afraid.

227. She was afraid of Ruiz.

228. She was afraid of what NYPD management would do once her private domestic circumstances became a Departmental matter.

229. She was afraid that she would be judged as a probationary police officer who could not control her personal life.

230. She was afraid of losing the career she had fought to build while raising her daughter, surviving homelessness, and working through the Police Academy.

231. She was concerned about Ruiz's immigration circumstances.

232. She was concerned about her daughter being present and feared that further police involvement could lead to the Administration for Children's Services becoming involved with her family.

233. Plaintiff's failure to immediately disclose the abuse was not because the abuse had not occurred.

234. It was the culmination of more than a year of coercion, fear, manipulation, physical injury, sexual pressure, threats against her career, and plaintiff's deeply held belief that exposing her private life to NYPD management could cost her everything she had worked to achieve.

August 24, 2025 — The 911 Call, Arrest, and Immediate Suspension

235. During the early-morning hours of August 24, 2025, plaintiff and Andres Alejandro Ruiz Blanco were inside plaintiff's Bronx apartment when another argument developed concerning their deteriorating relationship, plaintiff's work schedule, finances, and Ruiz's continuing pressure upon plaintiff to marry him.

236. By that point, plaintiff did not want Ruiz living in her apartment, did not want to continue the relationship, did not want sexual contact with him, and did not want to marry him.

237. Plaintiff was also preparing to transfer from the 30th Precinct to the 19th Precinct and was under significant stress because Ruiz was not consistently contributing toward the household expenses as he had promised.

238. During the argument, Ruiz accused plaintiff of spending too much time at work and accused her of cheating on him with a coworker.

239. Plaintiff became frustrated and again told Ruiz to leave her apartment.

240. Unlike prior arguments in which plaintiff had ultimately allowed Ruiz to remain, plaintiff was determined that night that she wanted him out.

241. While they were in the bedroom, plaintiff used her feet to push Ruiz off the bed because she wanted him to get up and leave the apartment.

242. Plaintiff has consistently maintained that she did not assault Ruiz.

243. During the same confrontation, plaintiff finally told Ruiz unequivocally that she was not going to marry him.

244. Plaintiff repeatedly told Ruiz, approximately twenty times, “I’m not marrying you.”

245. Plaintiff confronted Ruiz concerning the extraordinary pressure he had placed upon her to marry him quickly, including making court appointments without consulting her and then expecting her simply to appear and execute marriage paperwork.

246. Plaintiff had come to believe that Ruiz’s urgency was directly connected to his immigration circumstances, his repeated fear of deportation, the expiration of his purported work

authorization, and his desire to use plaintiff's United States citizenship as a means of obtaining lawful authority to remain in the United States.

247. Plaintiff no longer intended to allow herself to be used for that purpose and made clear to Ruiz that the marriage was not going to happen.

248. Ruiz became extremely upset.

249. Ruiz told plaintiff that she would "pay" for the emotional damage she had caused him.

250. Ruiz then told plaintiff, in substance, "Watch, I'm calling the cops on you. You will pay for this."

251. Plaintiff initially did not believe that Ruiz would actually call 911. The two had argued before, and plaintiff believed Ruiz was again threatening her as a means of forcing her to back down.

252. Approximately five minutes later, Ruiz called 911.

253. NYPD's contemporaneous Duty Captain report records that, at approximately 0126 hours, a "10-34 family" radio run was transmitted for plaintiff's residence at 383 East 141st Street, Apartment 16C, Bronx, New York.

254. According to that report, the male caller stated that his "wife" had assaulted him.

255. Defendant KHALEEQ A. MIDDLETON, then serving as an FTU Sergeant and patrol supervisor, responded to the location together with Police Officer Garcia, his operator.

256. Police Officers Saad, Wright, and Perkinson also responded.

257. When the officers arrived, Ruiz presented himself to them as the complaining party.

258. Ruiz told the responding officers that his significant other had attacked him and displayed what he claimed were scratches on his hands and the right side of his neck.

259. Ruiz then directed the officers toward the room where plaintiff was located.

260. Police Officer Garcia approached plaintiff and asked her to come out and explain what had occurred.

261. Plaintiff told the officers that nothing had happened beyond a verbal dispute.

262. Plaintiff did not tell the responding officers that she was an NYPD officer.

263. Plaintiff also did not tell the responding officers about the months of controlling behavior, sexual pressure, marriage pressure, threats to her career, or Ruiz's repeated refusal to accept the end of the relationship.

264. Plaintiff did not disclose the July 2025 incident in which Ruiz pulled the bedroom door while plaintiff was attempting to remove him from the apartment, causing plaintiff to fall and sustain bruising.

265. Plaintiff did not tell the officers that she had photographed those bruises inside the 30th Precinct the following day and had kept the photographs on her telephone.

266. Plaintiff did not make a cross-complaint against Ruiz.

267. Plaintiff remained silent because she was afraid of the consequences of exposing everything that had been occurring inside her home.

268. Plaintiff was still a probationary NYPD officer. She was afraid that admitting that she was being abused, controlled, sexually pressured, and threatened by a man living in her home would cause supervisors to judge her, question her judgment, scrutinize her personal life, and jeopardize the career she had fought to obtain.

269. Plaintiff was also concerned about her daughter, who was present in the home, and feared that expanding the police investigation could lead to involvement by the Administration for Children's Services.

270. Plaintiff remained concerned about Ruiz's immigration circumstances and, despite everything he had done to her, was reluctant to initiate a police complaint that could expose him to additional legal or immigration consequences.

271. Plaintiff's silence was therefore consistent with the manner in which she had handled the abuse for months: she hid the bruises, went to work, performed her duties, and tried to keep the chaos occurring inside her home from becoming known inside the NYPD.

272. According to the Department's own report, after plaintiff stated that nothing had happened, defendant KHALEEQ A. MIDDLETON ordered plaintiff placed under arrest.

273. Plaintiff was then transported to PSA 7.

274. Critically, the Department's own report reflects that Ruiz did not reveal until after plaintiff had already been transported that his domestic partner was herself an NYPD police officer assigned to the 19th Precinct.

275. Once Ruiz disclosed that fact, the nature of the Department's response immediately changed.

276. Defendant KHALEEQ A. MIDDLETON notified the Duty Captain and awaited further direction.

277. At approximately 0225 hours, defendant ABRAHAM BADILLO, serving as the Patrol Borough Bronx Duty Captain, arrived at plaintiff's residence.

278. ABRAHAM BADILLO did not arrive to investigate plaintiff's history as a potential victim of domestic violence. The Department's report reflects that ABRAHAM BADILLO interviewed Ruiz.

279. ABRAHAM BADILLO's interaction with Ruiz was captured on ABRAHAM BADILLO's body-worn camera.

280. Ruiz gave ABRAHAM BADILLO a version of events in which he claimed that plaintiff had initiated a physical struggle while preventing him from leaving the bedroom.

281. Ruiz claimed that plaintiff jumped on him, that a struggle followed, and that he sustained scratches to the right side of his neck, chest, and hands.

282. Ruiz further told ABRAHAM BADILLO that the dispute continued into the living room and that he told plaintiff he intended to call the police.

283. According to Ruiz's account to ABRAHAM BADILLO, plaintiff responded, "Go ahead," returned to the bedroom, and Ruiz then dialed 911.

284. Ruiz additionally told ABRAHAM BADILLO that he purportedly had not intended to have plaintiff arrested but had only wanted her to "calm down."

285. Ruiz's account to ABRAHAM BADILLO omitted the history plaintiff alleges preceded that night: his repeated threats to damage her career, his refusal to leave her home, the prior physical incident that caused her injuries, his sexual pressure, his repeated attempts to force an expedited marriage, his immigration concerns, and his statement immediately before calling 911 that plaintiff would "pay" after refusing to marry him.

286. The Department's Duty Captain report does not document ABRAHAM BADILLO conducting any comparable interview of plaintiff at the apartment concerning whether she was herself a victim of domestic violence, whether Ruiz had previously assaulted or

threatened her, whether she feared Ruiz, whether she had attempted to end the relationship, or whether Ruiz had previously threatened her employment.

287. Instead, the Department immediately shifted its attention to plaintiff's status as an NYPD officer and the employment consequences that would follow from the arrest.

288. At approximately 0310 hours, ABRAHAM BADILLO arrived at PSA 7, where plaintiff had been taken following KHALEEQ A. MIDDLETON's arrest order.

289. According to ABRAHAM BADILLO's own UF49, he asked plaintiff only "basic pedigree questions regarding NYPD matters."

290. Defendants PAWEL MASLINSKI and JOSEPH M. CHARNECO of Internal Affairs Bureau Group 9 then arrived at PSA 7.

291. PAWEL MASLINSKI and JOSEPH M. CHARNECO retrieved plaintiff's NYPD identification card.

292. The desk at the 19th Precinct was directed to remove plaintiff's firearm and shield from her locker and secure them.

293. Thus, within hours of a domestic dispute in which plaintiff had said almost nothing about the abuse she had been enduring, the Department had already converted the incident into an Internal Affairs and employment matter.

294. At approximately 0453 hours, plaintiff was formally suspended from duty.

295. ABRAHAM BADILLO imposed the suspension under the authority of defendant DAVID A. WALL, then serving as Citywide Duty Chief.

296. Defendant Deputy Inspector JEFFREY M. HEILIG, serving as Duty Inspector, was also notified and involved in the command-level response.

297. A Supervisor's Fitness for Duty Report was prepared.

298. Plaintiff was advised concerning her scheduled tours while suspended and informed of the availability of Department counseling services.

299. The Department generated multiple official records arising from the incident, including ICAD No. 25082402035, Supervisor Fitness for Duty Report No. 2025-040-012876, Arrest Report No. B25643400R, Domestic Incident Report No. 2025-040-06064, and Internal Affairs Bureau Log No. 2025-26947.

300. ABRAHAM BADILLO concluded his preliminary report by recommending that plaintiff's commanding officer confer with the Department Advocate's Office for preparation of formal Charges and Specifications.

301. ABRAHAM BADILLO further recommended that the appropriate investigative unit monitor plaintiff's criminal proceedings and conduct a formal interview of plaintiff only after the criminal proceedings concluded.

302. The immediate institutional response was therefore arrest, Internal Affairs involvement, confiscation of plaintiff's Department identification and weapon, suspension from duty, creation of an Internal Affairs log, and a recommendation for disciplinary charges.

303. What the Department had not done before taking those employment actions was develop the history of the domestic relationship from plaintiff.

304. The Department had not learned that Ruiz had previously told plaintiff that he knew how to hurt her and her career.

305. It had not learned that plaintiff had already suffered physical injuries during a July confrontation with Ruiz and had photographed those injuries inside an NYPD precinct.

306. It had not learned that plaintiff had repeatedly tried to remove Ruiz from her residence.

307. It had not learned the extent to which plaintiff alleges Ruiz had used unwanted sexual contact, jealousy, surveillance of her movements, appearances at her workplace, threats to expose her personal problems, financial pressure, and demands for marriage to maintain control over her.

308. And it had not learned that, immediately before the 911 call that precipitated plaintiff's arrest, plaintiff had finally told Ruiz repeatedly that she would not marry him and Ruiz had responded that she would "pay."

309. Plaintiff alleges that the Department instead treated the silence produced by her fear as evidence against her and ultimately made that silence itself a disciplinary offense by charging her with failing to identify herself as a member of the NYPD.

310. Plaintiff's arrest and suspension on August 24, 2025 thus became the point at which the abuse occurring in her private life entered the NYPD disciplinary system—not with plaintiff being treated as a police officer who might herself be experiencing domestic violence, but with plaintiff immediately treated as the accused officer whose employment was now in jeopardy.

August 29, 2025 — NYPD Formally Identifies Plaintiff as the Victim of Domestic Violence

311. Five days after plaintiff's August 24, 2025 arrest and suspension, the NYPD generated a Domestic Incident Report concerning plaintiff and Andres Alejandro Ruiz Blanco.

312. The August 29, 2025 Domestic Incident Report expressly identified plaintiff, SHEILA M. NUNEZ-LOPEZ, as the "Victim/Deponent."

313. The same report expressly identified Andres Alejandro Ruiz Blanco as the "Suspect."

314. The Domestic Incident Report was completed by Police Officer Galvez, Tax No. 980538.

315. Plaintiff provided a written supporting deposition as part of the Domestic Incident Report.

316. In that supporting deposition, plaintiff reported that on August 28, 2025, while she was returning home after dropping her daughter off at school, she discovered a handwritten letter from Ruiz.

317. Plaintiff reported that the handwritten letter stated, in substance, that Ruiz was sorry for what had happened, wanted to be at the house, wanted to hug and kiss plaintiff, and wanted to apologize concerning the prior incident.

318. Plaintiff further reported that Ruiz had never returned his set of keys to her residence.

319. Based upon that fact and the presence of the handwritten letter, plaintiff believed that Ruiz had entered her residence without her permission.

320. Plaintiff further reported to the NYPD that she and Ruiz were then subject to orders of protection against one another.

321. Plaintiff's statement therefore placed the NYPD on notice that, only days after the August 24 incident, Ruiz allegedly retained access to plaintiff's residence and had entered her home without her permission notwithstanding the existence of protective orders.

322. Plaintiff thereafter took affirmative steps to prevent Ruiz from continuing to enter her home.

323. Plaintiff reported that she accelerated an appointment she already had to change the locks to her residence.

324. Plaintiff changed the locks that same day.

325. The Domestic Incident Report further documented information concerning Ruiz's social-media accounts and places where he could be located, including a Food Bazaar supermarket.

326. Plaintiff also reported that Ruiz did not have access to firearms, was employed, and did not drive.

327. This August 29, 2025 Domestic Incident Report was not an informal conversation, private disclosure, or later characterization created for litigation.

328. It was an official NYPD domestic-violence record generated within five days of plaintiff's arrest and suspension.

329. More importantly, the Department itself designated plaintiff as the "Victim/Deponent" and Ruiz as the "Suspect."

330. The Department's file also contained domestic-violence victim-rights notices explaining that police and courts can assist victims of domestic violence, including through orders of protection, arrest, shelter, counseling, and other services. The file contains those notices in both English and Spanish.

331. Thus, no later than August 29, 2025, the NYPD possessed its own official documentation identifying plaintiff as a victim of domestic violence and Ruiz as the suspected perpetrator.

332. That documentation existed before the Department issued formal Charges and Specifications against plaintiff on September 3, 2025.

333. Accordingly, by the time the NYPD elected to formalize disciplinary charges against plaintiff arising from the August 24 domestic incident, the Department already possessed

an official Domestic Incident Report in which plaintiff was identified as the victim and Ruiz was identified as the suspect.

Departmental Assignment, Domestic-Violence Training, and Criminal Proceedings

334. Following plaintiff's August 24, 2025 arrest and suspension, the Department removed her from her ordinary patrol assignment and restricted her duties while the criminal and Departmental matters remained pending.

335. NYPD issued plaintiff a written "Temporary Assignment" directing that, while on modified assignment, she reports to the Manhattan Court Section, located at One Police Plaza, Room S139. The directive instructed plaintiff to contact that command immediately concerning reporting times and tours.

336. Plaintiff complied with the Department's directives and continued reporting for duty while on modified assignment.

337. Thus, although plaintiff remained employed by NYPD, she was removed from the normal duties and responsibilities of a patrol officer and placed into a restricted assignment as a direct consequence of the August 24, 2025 domestic incident.

338. Plaintiff remained on modified duty for an extended period while the Department continued to evaluate the August 24 incident and her employment status.

339. During that period, plaintiff continued performing the duties assigned to her rather than abandoning her employment or refusing to cooperate with the Department.

340. Plaintiff ultimately worked at MCB for nearly one year during her modified-duty period.

341. During that time, plaintiff's coworkers and supervisors had an extended opportunity to observe her attendance, conduct, work ethic, skills, and performance.

342. Plaintiff remained hopeful that, after the criminal matter was resolved and the circumstances surrounding her relationship with Ruiz were better understood, she would be restored to full duty and permitted to continue her NYPD career.

343. The criminal prosecution arising from the August 24, 2025 incident proceeded separately in Bronx Criminal Court.

344. Plaintiff was arrested on August 24, 2025 and arraigned in Bronx Criminal Court that same day under Docket No. CR-023144-25BX.

345. The criminal case charged plaintiff with Criminal Mischief in the Fourth Degree under Penal Law § 145.00(1), Assault in the Third Degree under Penal Law § 120.00(1), and Harassment in the Second Degree under Penal Law § 240.26(1).

346. A temporary order of protection was also issued in connection with the criminal proceeding.

347. While that criminal matter remained pending, NYPD continued to treat the August 24 allegations as an employment and disciplinary matter.

348. On September 3, 2025—only ten days after plaintiff's arrest and only five days after NYPD had generated the Domestic Incident Report formally identifying plaintiff as the "Victim/Deponent" and Ruiz as the "Suspect"—the Department Advocate's Office issued formal Charges and Specifications against plaintiff.

349. The first specification alleged that, on August 24, 2025, plaintiff, while off duty in Bronx County, engaged in a physical dispute with Ruiz during which she allegedly scratched him about his body.

350. That specification cited Patrol Guide procedure A.G. 304-06 and Penal Law § 120.00(1) and characterized the alleged conduct as "Prohibited Conduct / Assault in the Third Degree."

351. The second specification alleged that plaintiff, after becoming involved in the domestic dispute, failed to identify herself as a member of the NYPD to the responding officers.

352. The Department separately characterized that alleged failure to identify herself as "Prohibited Conduct."

353. Defendant NEIL W. ZUBER signed the Charges and Specifications on behalf of the Department Advocate's Office.

354. Thereafter, on September 22, 2025, defendant ERIC PAGAN, Executive Officer of Patrol Borough Manhattan North, formally concurred with the issuance of the Charges and Specifications.

355. Accordingly, by September 2025, plaintiff was simultaneously facing a criminal prosecution, Departmental disciplinary charges, removal from normal patrol duties, and continued modified assignment arising from the same domestic incident.

356. Yet, at the same time, NYPD possessed its August 29, 2025 Domestic Incident Report expressly identifying plaintiff as the victim and Ruiz as the suspect.

357. Plaintiff thereafter completely ended contact with Ruiz.

358. By approximately September 2025, plaintiff blocked Ruiz across all forms of communication and determined that she no longer wanted him to have any access to either plaintiff or her daughter.

359. Although plaintiff was devastated by what the August 24 allegations had already done to her career, she was relieved that Ruiz was finally out of her life and away from her daughter.

360. Plaintiff believed that Ruiz had ultimately carried out the threat he made immediately before calling 911—that plaintiff would "pay" after refusing to marry him—because his allegations had resulted in plaintiff's arrest, suspension, modified assignment, Internal Affairs involvement, and disciplinary charges.

361. On October 14, 2025, the Bronx Criminal Court dismissed all three criminal charges against plaintiff.

362. The Certificate of Disposition reflects that the Criminal Mischief in the Fourth-Degree charge was dismissed and sealed pursuant to CPL 160.50.

363. The Certificate of Disposition likewise reflects that the Assault in the Third-Degree charge was dismissed and sealed pursuant to CPL 160.50.

364. The Harassment in the Second-Degree charge was also dismissed and sealed pursuant to CPL 160.50.

365. The criminal proceeding therefore terminated without a conviction against plaintiff, and the charges upon which the August 24 arrest had been based were dismissed and statutorily sealed.

366. The dismissal did not, however, end NYPD's employment-related treatment of plaintiff arising from the same accusations.

367. In October 2025, the Department placed plaintiff in domestic-violence classes for a period of approximately eight weeks.

368. Plaintiff attended the classes as directed by the Department.

369. The Department required plaintiff to undergo that domestic-violence programming even though, by then, NYPD's own August 29, 2025 Domestic Incident Report identified plaintiff as the "Victim/Deponent" and Ruiz as the "Suspect," and the criminal charges against plaintiff had been dismissed and sealed.

370. Plaintiff nevertheless complied with the Department's requirements because she remained a probationary Police Officer and wanted to preserve her career.

371. In December 2025, the Department interviewed plaintiff concerning the August 24 incident.

372. The interview lasted less than approximately twenty minutes.

373. Plaintiff answered the questions the Department asked concerning what occurred on August 24, 2025.

374. The questioning, however, focused upon that particular incident.

375. Plaintiff alleges that she was not asked whether Ruiz had previously abused her, whether she was afraid of him, whether something else had been occurring in the relationship, or whether the August 24 incident was part of a broader pattern of domestic abuse and coercive control.

376. Plaintiff did not disclose during that interview the July 2025 incident in which Ruiz caused her to fall and sustain bruising.

377. She likewise did not disclose the full extent of her fear, the unwanted sexual pressure, Ruiz's threats against her career, or everything she had been carrying privately during the relationship.

378. Plaintiff remained afraid that disclosing those circumstances as a probationary police officer would cause additional damage to her career and standing within the Department.

379. Plaintiff did, however, tell Department personnel during the December 2025 interview that she believed Ruiz had been using her as an "anchor" to obtain immigration papers.

380. Plaintiff further explained her belief that Ruiz wanted to portray himself as a victim of domestic violence so that he could obtain benefits or immigration status in the United States.

381. Plaintiff's statements concerning Ruiz's immigration motivation were consistent with what she had experienced throughout the relationship: his repeated discussion of his immigration problems, pressure for an expedited marriage, concern about remaining in the United States, and his 911 call immediately after plaintiff unequivocally refused to marry him.

382. Despite the dismissal and sealing of the criminal case, plaintiff remained on modified duty and continued working for the Department throughout 2026.

383. Plaintiff continued to perform the duties assigned to her at MCB for nearly one year.

384. During that extended period, Department supervisors and coworkers were able to observe plaintiff's actual workplace conduct and performance separate and apart from the accusations made by Ruiz on August 24, 2025.

385. Plaintiff continued to believe that she would eventually be permitted to return to full duty because the criminal case had been dismissed, she had complied with the Department's modified-duty assignment and domestic-violence training requirements, and she had continued to perform her assigned work.

September 2026 — Forced Resignation and Termination

386. In September 2026, while plaintiff was on a regular day off, plaintiff received a telephone call from the Department directing her to report to work.

387. During that telephone call, plaintiff was advised that she was going to be terminated and was instructed to report to the Department and resign.

388. Plaintiff thereafter reported to MCB as directed.

389. Faced with the representation that her termination was imminent, plaintiff executed paperwork resigning from the NYPD.

390. At the time, plaintiff understood that she was resigning from the Department rather than being formally terminated.

391. In connection with her resignation, plaintiff surrendered Department property, including her NYPD identification card, radio, and MetroCard.

392. The surrender of plaintiff's Department property was documented through Department records, including a memo-book entry and other separation documentation.

393. The Department also generated an Internal Affairs Bureau log concerning plaintiff's resignation.

394. An NYPD communication concerning plaintiff's separation expressly stated that an IAB log had been generated for the "resignation of Officer Nunez Lopez, Sheila Tax# 979376."

395. That communication identified IAB Log No. 2026-31930 and stated that plaintiff's resignation was effective September 5, 2026 at 1500 hours.

396. The Department therefore generated a contemporaneous Internal Affairs record expressly characterizing plaintiff's separation from NYPD as a resignation.

397. Plaintiff understood the same thing: that she had reported as directed, executed resignation paperwork, surrendered her department property, and resigned rather than being terminated.

398. Plaintiff thereafter received a written notice from the NYPD Enterprise Risk Management Section dated September 4, 2026.

399. That notice materially contradicted plaintiff's understanding of what had occurred.

400. The September 4, 2026 notices stated that plaintiff's "services as a Probationary Police Officer in the New York City Police Department are terminated effective 2400 hours, September 4, 2026, by the Police Commissioner."

401. The notice cited New York City Department of Citywide Administrative Services Personnel Rules and Regulations § 5.2.7 as the authority for the termination.

402. Accordingly, the Department took the position that plaintiff had been terminated effective at 2400 hours on September 4, 2026, even though plaintiff had been directed to report and resign and Department records separately documented her resignation effective September 5, 2026 at 1500 hours.

403. Plaintiff alleges that defendant JESSICA S. TISCH, as Police Commissioner, approved the decision terminating plaintiff's employment.

404. The termination occurred notwithstanding the fact that the criminal prosecution arising from the August 24, 2025 incident had been dismissed and sealed pursuant to CPL 160.50 approximately eleven months earlier.

405. The termination also occurred notwithstanding NYPD's own August 29, 2025 Domestic Incident Report identifying plaintiff as the "Victim/Deponent" and Andres Alejandro Ruiz Blanco as the "Suspect."

406. By the time plaintiff's employment was terminated, the Department had therefore possessed for approximately one year an official NYPD record identifying plaintiff as the victim of domestic violence.

407. By the time plaintiff's employment was terminated, plaintiff had also completed the Department-directed domestic-violence training, participated in the Department interview, remained on modified duty, and continued performing the work assigned to her for nearly one year.

408. During that period, Department supervisors and coworkers had substantial opportunity to observe plaintiff's actual workplace conduct, work ethic, performance, and ability to perform assigned duties independently of the accusations Ruiz made on August 24, 2025.

409. Nevertheless, defendants ended plaintiff's NYPD career through an employment process that remained rooted in the August 24, 2025 domestic incident, plaintiff's resulting arrest, and the accusations made by Ruiz.

410. Plaintiff alleges that defendants continued to use or rely upon the August 24, 2025 arrest and accusations as adverse employment information notwithstanding the dismissal and sealing of the criminal case.

411. Plaintiff further alleges that defendants failed to separate the allegations arising from plaintiff's domestic-victimization circumstances from plaintiff's actual employment record and performance.

412. The ultimate termination therefore followed a sequence in which plaintiff was arrested in connection with an abusive domestic relationship, suspended, placed on modified duty, subjected to disciplinary proceedings and domestic-violence programming, and ultimately

removed from the NYPD despite the dismissal and sealing of the criminal charges and the Department's own documentation identifying her as the victim of domestic violence.

CONCLUSION

413. This case concerns what happened after plaintiff's private experience as a victim of domestic violence intersected with her employment as a probationary NYPD Police Officer.

414. Defendant THE CITY OF NEW YORK**,** acting through the NYPD, and defendants JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO became involved at different stages of the employment and disciplinary process that began with the August 24, 2025 domestic incident and ultimately ended plaintiff's NYPD career.

415. What initially appeared to defendants as an arrest arising from a domestic dispute did not remain that simple. Within days, the Department possessed its own Domestic Incident Report identifying plaintiff as the "Victim/Deponent" and Andres Alejandro Ruiz Blanco as the "Suspect."

416. The criminal proceeding likewise did not substantiate the accusations against plaintiff. The charges arising from the August 24, 2025 incident were dismissed and sealed pursuant to CPL 160.50.

417. By that time, defendants also possessed information demonstrating that the August 24 incident arose from a substantially broader domestic history involving plaintiff's efforts to end the relationship, Ruiz's pressure for marriage, his immigration concerns, his threats concerning plaintiff's career, and plaintiff's fear of disclosing what had been occurring inside her home.

418. Nevertheless, the consequences of the August 24 arrest continued throughout plaintiff's remaining employment. Plaintiff was suspended, removed from ordinary patrol duties, placed on modified assignment, subjected to formal Charges and Specifications, required to participate in domestic-violence programming, interviewed concerning the incident, and maintained on modified duty for nearly one year.

419. Defendants ERIC PAGAN and NEIL W. ZUBER directly participated in the Department's disciplinary process by approving and authorizing formal Charges and Specifications against plaintiff after the Department had already generated documentation identifying plaintiff as a victim of domestic violence.

420. During her extended modified-duty assignment, plaintiff continued performing the duties assigned to her, and Department supervisors and coworkers had substantial opportunity to evaluate her actual workplace conduct, work ethic, reliability, and performance independently of the accusations made by Ruiz.

421. Yet in September 2026, plaintiff was told that she was going to be terminated and should resign. She reported as directed, executed resignation paperwork, surrendered her department property, and was thereafter informed that defendant JESSICA S. TISCH, as Police Commissioner, had terminated her employment.

422. Plaintiff alleges that defendants never meaningfully separated her status as a victim of domestic violence from the employment consequences generated by that domestic relationship and continued to treat the arrest and terminated criminal accusations as adverse employment information even after the criminal case had been dismissed and sealed.

423. Plaintiff therefore alleges that the end of her NYPD career was the culmination of discriminatory treatment based upon protected circumstances recognized under New York law:

her arrest record and terminated criminal accusations, and her actual or perceived status as a victim of domestic violence.

424. It is upon that course of conduct that plaintiff's claims under the New York State Human Rights Law and the New York City Human Rights Law are based.

VIOLATIONS AND CLAIMS ALLEGED

FIRST CAUSE OF ACTION
New York State Human Rights Law — Arrest and Criminal-Accusation Discrimination
Executive Law §§ 296(16) and 296(6)
Against THE CITY OF NEW YORK and JESSICA S. TISCH, Individually and in Her Official Capacity

425. Plaintiff repeats and realleges paragraphs 1 through 424 as though fully set forth herein.

426. Plaintiff's August 24, 2025, arrest and the criminal accusations arising therefrom were dismissed and sealed pursuant to CPL 160.50 on October 14, 2025.

427. Executive Law § 296(16) prohibits adverse action based upon an arrest or criminal accusation that has terminated in favor of the accused and is protected under CPL 160.50.

428. Following the dismissal and sealing of plaintiff's criminal case, defendant THE CITY OF NEW YORK, acting through the NYPD, continued to subject plaintiff to adverse employment consequences arising from the August 24, 2025 arrest and accusations, including continued modified duty and ultimately termination.

429. Defendant JESSICA S. TISCH, individually and in her official capacity as Police Commissioner, personally participated in and approved plaintiff's termination in September 2026.

430. At the time of plaintiff's termination, the criminal accusations had been dismissed and sealed for approximately eleven months.

431. Plaintiff alleges that her protected arrest and terminated criminal accusations were considered, relied upon, and/or used adversely in connection with the continuation and termination of her employment.

432. By the foregoing conduct, defendant THE CITY OF NEW YORK violated Executive Law § 296(16), and defendant JESSICA S. TISCH, individually and in her official capacity, participated in and/or aided and abetted that unlawful discrimination in violation of Executive Law § 296(6).

433. As a direct and proximate result, plaintiff suffered the damages alleged herein.

SECOND CAUSE OF ACTION
New York State Human Rights Law — Discrimination Based Upon Status as a Victim of Domestic Violence and Aiding and Abetting
Executive Law §§ 296(1)(a), 296(22)(a), and 296(6)
Against All Defendants

434. Plaintiff repeats and realleges paragraphs 1 through 433 as though fully set forth herein.

435. Plaintiff was a victim of domestic violence within the meaning of the New York State Human Rights Law.

436. Executive Law §§ 296(1)(a) and 296(22)(a) prohibit an employer from discharging or otherwise discriminating against an employee in the terms, conditions, or privileges of employment because of the employee's status as a victim of domestic violence.

437. By August 29, 2025, NYPD possessed an official Domestic Incident Report identifying plaintiff as the "Victim/Deponent" and Andres Alejandro Ruiz Blanco as the "Suspect."

438. Notwithstanding that knowledge, defendant THE CITY OF NEW YORK, acting through the NYPD, continued to subject plaintiff to adverse employment and disciplinary consequences arising from the same domestic relationship, culminating in the termination of plaintiff's employment.

439. Defendants JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO, individually and in their official capacities, personally participated in, authorized, approved, implemented, facilitated, continued, and/or aided and abetted the adverse employment actions alleged herein.

440. Their participation included plaintiff's suspension, Internal Affairs processing, initiation and approval of disciplinary charges, continuation of employment consequences arising from the domestic incident, and ultimate termination.

441. Defendants' conduct subjected plaintiff to materially adverse terms and conditions of employment because of circumstances arising from and inseparable from her status as a victim of domestic violence.

442. Defendant THE CITY OF NEW YORK is liable for the underlying discriminatory employment practices pursuant to Executive Law §§ 296(1)(a) and 296(22)(a).

443. Defendants JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO, individually and in their official capacities, are further liable under Executive Law § 296(6) based upon their actual participation in and/or aiding and abetting of the unlawful discriminatory conduct.

444. By the foregoing conduct, defendants violated Executive Law §§ 296(1)(a), 296(22)(a), and 296(6).

445. As a direct and proximate result, plaintiff suffered the damages alleged herein.

THIRD CAUSE OF ACTION
New York City Human Rights Law — Arrest and Criminal-Accusation Discrimination
New York City Administrative Code §§ 8-107(11)(a) and 8-107(6)
Against THE CITY OF NEW YORK and JESSICA S. TISCH, Individually and in Her Official Capacity

446. Plaintiff repeats and realleges paragraphs 1 through 445 as though fully set forth herein.

447. New York City Administrative Code § 8-107(11)(a) prohibits an employer from acting adversely against an employee by reason of an arrest or criminal accusation where such adverse action is prohibited by Executive Law § 296(16).

448. Plaintiff's August 24, 2025 arrest and the criminal accusations arising therefrom were dismissed and sealed pursuant to CPL 160.50 on October 14, 2025.

449. Following the dismissal and sealing of plaintiff's criminal case, defendant THE CITY OF NEW YORK, acting through the NYPD, continued to subject plaintiff to adverse employment consequences arising from the arrest and criminal accusations, including continued modified duty and ultimately termination.

450. Defendant JESSICA S. TISCH, individually and in her official capacity as Police Commissioner, personally participated in and approved plaintiff's termination in September 2026, approximately eleven months after the criminal accusations had been dismissed and sealed.

451. Plaintiff alleges that her protected arrest and terminated criminal accusations were considered, relied upon, and/or used adversely in connection with the continuation and termination of her employment.

452. Defendant THE CITY OF NEW YORK is liable for the underlying unlawful discriminatory practice, and defendant JESSICA S. TISCH, individually and in her official capacity, actually participated in and/or aided and abetted that discrimination within the meaning of Administrative Code § 8-107(6).

453. By the foregoing conduct, defendants THE CITY OF NEW YORK and JESSICA S. TISCH, individually and in her official capacity, violated Administrative Code §§ 8-107(11)(a) and 8-107(6).

454. As a direct and proximate result, plaintiff suffered the damages alleged herein.

FOURTH CAUSE OF ACTION
New York City Human Rights Law — Discrimination Based Upon Actual or Perceived Status as a Victim of Domestic Violence and Aiding and Abetting
New York City Administrative Code §§ 8-107(27)(a), 8-107(27)(g), and 8-107(6)
Against All Defendants

455. Plaintiff repeats and realleges paragraphs 1 through 454 as though fully set forth herein.

456. Administrative Code § 8-107(27)(a) prohibits an employer or its agent from discharging or otherwise discriminating against an individual in the terms, conditions, or privileges of employment because of the individual's actual or perceived status as a victim of domestic violence.

457. Plaintiff was actually and/or perceived to be a victim of domestic violence within the meaning of the NYCHRL.

458. By August 29, 2025, NYPD possessed an official Domestic Incident Report identifying plaintiff as the "Victim/Deponent" and Andres Alejandro Ruiz Blanco as the "Suspect."

459. Notwithstanding that knowledge, defendant THE CITY OF NEW YORK, acting through the NYPD, continued to subject plaintiff to adverse employment and disciplinary consequences arising from the domestic relationship and ultimately terminated her employment.

460. The NYCHRL expressly provides that discrimination based upon an individual's status as a victim of domestic violence includes practices based solely upon the actions of the person who perpetrated acts or threats of violence against the individual. Administrative Code § 8-107(27)(g).

461. Plaintiff alleges that defendants treated conduct, accusations, circumstances, and consequences generated by Ruiz's actions against plaintiff as grounds for adverse employment treatment against plaintiff herself.

462. Defendants JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO, individually and in their official capacities, personally participated in, authorized, approved, implemented, facilitated, continued, and/or aided and abetted the discriminatory employment actions alleged herein.

463. Defendant THE CITY OF NEW YORK is liable for the underlying discrimination under Administrative Code § 8-107(27), and the individual defendants are liable, individually and in their official capacities, based upon their direct participation in and/or aiding and abetting of the unlawful discriminatory conduct pursuant to Administrative Code § 8-107(6).

464. By the foregoing conduct, defendants THE CITY OF NEW YORK, JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO violated Administrative Code §§ 8-107(27)(a) and 8-107(6), as informed by the protections set forth in Administrative Code § 8-107(27)(g).

465. As a direct and proximate result, plaintiff suffered the damages alleged herein.

JURY TRIAL

466. Plaintiff SHEILA M. NUNEZ-LOPEZ hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff SHEILA M. NUNEZ-LOPEZ respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO, with the individual defendants sued in their individual and official capacities, as follows:

a. declaring that defendants subjected plaintiff to unlawful discrimination in violation of the New York State Human Rights Law and New York City Human Rights Law;

b. awarding plaintiff compensatory damages in an amount to be determined at trial for lost wages, lost benefits, lost pension and retirement benefits and opportunities, diminished earning capacity, emotional distress, humiliation, embarrassment, damage to professional standing, and all other pecuniary and nonpecuniary losses caused by defendants' unlawful conduct;

c. awarding plaintiff back pay, together with the value of all employment benefits, pension credits, seniority, and other compensation she would have received absent defendants' unlawful conduct;

d. directing defendant THE CITY OF NEW YORK to reinstate plaintiff to employment with the NYPD with appropriate seniority, pension credit, benefits, employment status, and other incidents of employment, or, if reinstatement is not practicable, awarding plaintiff front pay and other appropriate make-whole relief;

e. directing defendants to correct plaintiff's employment and personnel records to eliminate the consequences of the unlawful discriminatory employment actions established in this action;

f. awarding punitive damages under the New York City Human Rights Law against the individual defendants, in their individual capacities, to the extent permitted by law;

g. awarding plaintiff reasonable attorneys' fees, costs, and expenses to the fullest extent authorized by the New York State Human Rights Law and New York City Human Rights Law;

h. awarding prejudgment and post-judgment interest as permitted by law;

i. granting plaintiff such other and further relief as the Court deems appropriate.

Dated: September 24, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SHEILA M. NUNEZ-LOPEZ

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ATTORNEY VERIFICATION

STATE OF NEW YORK
ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

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

The foregoing Verified Complaint is true to the knowledge of the affirmant, except as to those matters stated to be alleged upon information and belief, and as to those matters, affirmant believes them to be true.

This verification is made by the affirmant, rather than by plaintiff, pursuant to CPLR 3020(d)(3), because plaintiff is not within either New York County or Westchester County, the counties in which affirmant maintains offices. CPLR 3020(d)(3) permits verification by an attorney where the party is not within the county in which the attorney maintains his office.

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

Dated: September 24, 2026
Yonkers, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SHEILA M. NUNEZ-LOPEZ

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX INDEX NO.:

SHEILA M. NUNEZ-LOPEZ

Plaintiff,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, ERIC PAGAN, DAVID A. WALL, NEIL W. ZUBER, JEFFREY M. HEILIG, ABRAHAM BADILLO, KHALEEQ A. MIDDLETON, PAWEL MASLINSKI, and JOSEPH M. CHARNECO

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff SHEILA M. NUNEZ-LOPEZ

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