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

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MARIA A. DELACRUZ

Plaintiff,

-against-

THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO

Defendants

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Summons

Index No.

Jury Demand

To the Defendants named above:

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

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

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

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

Venue is proper in New York County pursuant to CPLR § 504(3), because a substantial part of the causes of action against defendant THE CITY OF NEW YORK arose in New York County.

Defendant AMANJEET S. SANDHU served as Commanding Officer of the NYPD's Transit District 1 in New York County, where the principal sexual grooming, unwanted sexual advances, sexual harassment, hostile work environment, and abuse of supervisory authority alleged herein occurred.

Defendant STEVEN M. MAURIELLO exercised supervisory and command authority over Transit Borough Manhattan, including matters involving Plaintiff's complaints concerning sexual harassment, sexually hostile workplace conditions, intimidation, and retaliatory treatment.

Defendants MARIA I. FRANCO and ROSARIO E. MONTERO engaged in the discriminatory, sexually hostile, and retaliatory conduct alleged herein while assigned to Transit District 1 in New York County.

Defendant JESSICA S. TISCH, as Police Commissioner of the City of New York, exercised executive, supervisory, policymaking, disciplinary, corrective, and ratification authority over the NYPD and its executive personnel, including defendants STEVEN M. MAURIELLO, AMANJEET S. SANDHU, and TAMECCA GREENE.

Defendant TAMECCA GREENE engaged in the discriminatory and retaliatory conduct alleged herein while exercising command authority over Plaintiff at Transit District 32 in Kings County.

The acts, omissions, discriminatory practices, sexually hostile conduct, retaliatory acts, failures to protect, failures to supervise, failures to correct, and ratification alleged herein occurred within the City of New York, including New York County and Kings County.

Dated: October 21, 2026
Yonkers, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff MARIA A. DELACRUZ

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DEFENDANT ADDRESSES

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

JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; ARIA I. FRANCO; and ROSARIO E. MONTERO
c/o Police Department City of New York
Legal Bureau
One Police Plaza
New York, N.Y. 10038

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

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MARIA A. DELACRUZ

Plaintiff,

-against-

THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO

Defendants

Verified Complaint

Index No.

Jury Demand

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Plaintiff MARIA A. DELACRUZ by her attorney THE SANDERS FIRM, P.C., complaining of defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO, alleges as follows:

INTRODUCTION

This action arises from sexual grooming, sexual harassment, sex discrimination, hostile work environment, and retaliation against plaintiff MARIA A. DELACRUZ ("DELACRUZ"), a Hispanic female police officer of Dominican national origin, by commanding officers, supervisors, and executive personnel of the New York City Police Department ("NYPD"). The allegations concern more than isolated instances of workplace misconduct. They describe the exploitation of a subordinate officer by supervisors who cultivated her trust, exercised control over her employment, and subsequently subjected her to unwanted sexual attention, intimidation, humiliation, and retaliation.

DELACRUZ entered the NYPD in July 2021 after previously serving as a correction officer. She holds a Bachelor of Arts in Criminal Justice and a Master of Arts in Emergency Management, graduating Magna Cum Laude with a 3.7 grade point average. On September 28, 2026, she was commissioned as a Second Lieutenant in the United States Army. Despite these accomplishments, DELACRUZ alleges that supervisors repeatedly reduced her professional identity to her physical appearance, Dominican heritage, and presumed sexual availability rather than recognizing her abilities and commitment to public service.

At Transit District 1 ("TD1") in New York County, defendant AMANJEET S. SANDHU ("SANDHU"), then Commanding Officer, initially gained DELACRUZ's trust by protecting her from supervisory hostility, accommodating her childcare responsibilities, and providing professional assistance. Having established that dependence, SANDHU progressively crossed professional boundaries. On October 11, 2023, he declared his love for DELACRUZ and expressed his desire to become her lover rather than remain her supervisor. Having previously experienced sexual exploitation and retaliation by male employers, DELACRUZ immediately thought, "FUCKKK, I'm back in the same trap all over again."

SANDHU's alleged misconduct included sexually explicit comments about DELACRUZ's breasts and buttocks, intrusive questions about her sexual activities and masturbation, changing clothes in her presence, attempting to kiss her without consent, and transmitting unsolicited sexually explicit material. At a December 2023 departmental Christmas party, SANDHU grabbed DELACRUZ's arm and insisted that she accompany him. DELACRUZ rejected his advances but feared losing the supervisory protection upon which she had come to depend.

Meanwhile, the sexually degrading rumors surrounding her assignment as SANDHU's driver escalated into workplace hostility. Defendant ROSARIO E. MONTERO ("MONTERO") confronted DELACRUZ inside the women's locker room while she was partially undressed, accusing her of "fucking the captain." When DELACRUZ confronted defendant STEVEN M. MAURIELLO ("MAURIELLO"), then Commanding Officer of Transit Borough Manhattan, concerning his participation in those rumors, he responded, "I'm not the only one saying that. Everyone here thinks that." Defendant MARIA I. FRANCO ("FRANCO") had also contributed to the hostile supervisory environment DELACRUZ experienced at TD1.

Rather than obtain meaningful protection, DELACRUZ found herself pressured to leave TD1. She subsequently accepted a transfer to Transit District 32 ("TD32") in Kings County after defendant TAMECCA GREENE ("GREENE"), then its Commanding Officer, promised to protect her from further harassment and mistreatment. GREENE presented herself as someone who would provide the professional security that DELACRUZ had been denied.

DELACRUZ alleges that GREENE instead exploited her vulnerability while protecting the interests of SANDHU and MAURIELLO. GREENE instructed DELACRUZ not to discuss what had occurred at TD1, isolated her from ordinary supervisory relationships, and required her to perform personal errands and administrative responsibilities. On August 24, 2024, GREENE directed DELACRUZ to attend a mandatory meeting at the 73rd Precinct on GREENE's behalf while GREENE remained in her office. During August and September 2024, GREENE also repeatedly directed DELACRUZ to use GREENE's official NYPD identification card to record GREENE as present for duty through the Department's electronic attendance system.

Once DELACRUZ's transfer became final, GREENE allegedly asserted that DELACRUZ belonged to her and that, as a Black female captain, GREENE would be believed

over DELACRUZ if she complained. GREENE subsequently subjected DELACRUZ to repeated tour changes, disrupted childcare and educational arrangements, disciplinary proceedings, interference with medical treatment following a line-of-duty injury, and obstruction of her efforts to obtain another assignment. DELACRUZ alleges that the officer who promised to protect her instead used supervisory authority to control, exploit, and punish her.

The contrast between DELACRUZ's treatment under GREENE and her subsequent favorable experience in the Legal Borough Body-Worn Camera Unit further underscores her allegations of discriminatory and retaliatory supervisory treatment. Although DELACRUZ obtained temporary relief through reassignment, her subsequent return to TD32 brought renewed scheduling conflicts, disciplinary threats, and efforts to prevent her departure from the command. By September 2025, following prolonged duty hours, exhaustion, and repeated unsuccessful efforts to obtain assistance, DELACRUZ sought intervention from the Employee Assistance Unit and surrendered her departmental firearms.

Defendant JESSICA S. TISCH ("TISCH"), as Police Commissioner, exercised executive authority over the Department's supervision, investigation, disciplinary practices, and accountability systems. Defendant THE CITY OF NEW YORK ("CITY"), through its supervisory and managerial personnel, failed to provide effective protection against the discriminatory, sexually hostile, and retaliatory employment conditions alleged herein.

DELACRUZ brings this action under the New York State Human Rights Law ("NYSHRL"), Executive Law § 296, and the New York City Human Rights Law ("NYCHRL"), Administrative Code § 8-107, seeking damages and appropriate equitable relief for the unlawful treatment she alleges she endured while attempting to maintain her livelihood, protect her dignity, and pursue her career in public service.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to Article VI, § 7 of the New York State Constitution because this action seeks legal and equitable relief for violations of the New York State Human Rights Law ("NYSHRL"), Executive Law § 296, and the New York City Human Rights Law ("NYCHRL"), Administrative Code § 8-107.

2. This Court has jurisdiction over defendant THE CITY OF NEW YORK because it is a municipal corporation organized and existing under the laws of the State of New York, operates the New York City Police Department ("NYPD"), and employed plaintiff MARIA A. DELACRUZ ("DELACRUZ") and the individual defendants during the relevant periods.

3. This Court has jurisdiction over defendant JESSICA S. TISCH because, as Police Commissioner of the City of New York, she exercises executive, supervisory, policymaking, disciplinary, corrective, and ratification authority over the NYPD and its executive personnel, including the supervisory practices and employment decisions challenged herein.

4. This Court has jurisdiction over defendants STEVEN M. MAURIELLO, Deputy Chief; AMANJEET S. SANDHU, Deputy Inspector; MARIA I. FRANCO, Lieutenant; and ROSARIO E. MONTERO, Police Officer, because they allegedly committed, participated in, aided, abetted, or contributed to the discriminatory, sexually hostile, and retaliatory conduct arising from NYPD operations at Transit District 1 ("TD1") and Transit Borough Manhattan in New York County.

5. This Court has jurisdiction over defendant TAMECCA GREENE, Deputy Inspector, because she allegedly engaged in discriminatory and retaliatory employment practices while exercising supervisory and command authority over DELACRUZ at Transit District 32 ("TD32") in Kings County.

6. Venue is proper in New York County pursuant to CPLR § 504(3) because a substantial part of the causes of action against defendant THE CITY OF NEW YORK arose in New York County, where DELACRUZ was subjected to the alleged sexual grooming, sexual harassment, hostile work environment, discriminatory treatment, and abuse of supervisory authority at TD1.

7. Plaintiff designates New York County as the place of trial because the principal acts and omissions giving rise to her claims occurred in New York County, with additional discriminatory and retaliatory conduct occurring in Kings County.

8. The discriminatory, sexually hostile, and retaliatory acts alleged herein fall within the territorial scope of the NYSHRL and NYCHRL because the challenged conduct and resulting employment consequences occurred within the City of New York.

PROCEDURAL REQUIREMENTS

9. Plaintiff have commenced this action within the applicable statute of limitations.

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

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

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

13. No Notice of Claim is required as a condition precedent to the commencement of this action because plaintiff’s claims are brought pursuant to the New York State Human Rights Law and the New York City Human Rights Law, which do not require service of a Notice of

Claim under General Municipal Law § 50-e, General Municipal Law § 50-i, or any other notice-of-claim statute as a prerequisite to suit.

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

15. Plaintiff demand a trial by jury on all issues so triable.

PLAINTIFF

16. Plaintiff MARIA A. DELACRUZ ("DELACRUZ") is an adult Hispanic female of Dominican national origin who, at all relevant times, was employed as a police officer by the New York City Police Department ("NYPD").

17. DELACRUZ entered the NYPD in July 2021 and served at Transit District 1 ("TD1") in New York County and subsequently at Transit District 32 ("TD32") in Kings County.

18. DELACRUZ holds a Bachelor of Arts in Criminal Justice and a Master of Arts in Emergency Management, graduating Magna Cum Laude with a 3.7 grade point average, and was commissioned as a Second Lieutenant in the United States Army on September 28, 2026.

19. DELACRUZ was subjected to the discriminatory, sexually hostile, and retaliatory conduct alleged herein, resulting in emotional distress, humiliation, and adverse employment consequences.

DEFENDANTS

20. Defendant THE CITY OF NEW YORK ("CITY") is a municipal corporation organized and existing under the laws of the State of New York, operates the New York City Police Department ("NYPD"), and employed Plaintiff and the individual defendants during the relevant periods.

21. Defendant JESSICA S. TISCH ("TISCH") is the Police Commissioner of the NYPD and exercises executive authority over its operations, policies, personnel, supervision, investigations, and disciplinary practices.

22. Defendant STEVEN M. MAURIELLO ("MAURIELLO") is a Deputy Chief of the NYPD and Commanding Officer of Transit Borough Manhattan, with supervisory and command authority over subordinate personnel and transit commands.

23. Defendant AMANJEET S. SANDHU ("SANDHU") is a Deputy Inspector of the NYPD assigned to Transit Borough Manhattan and formerly served as Commanding Officer of Transit District 1 ("TD1") in New York County.

24. Defendant TAMECCA GREENE ("GREENE") is a Deputy Inspector of the NYPD assigned to Transit Borough Special Operations District and formerly served as Commanding Officer of Transit District 32 ("TD32") in Kings County.

25. Defendant MARIA I. FRANCO ("FRANCO") is a Lieutenant of the NYPD who, during the relevant period, exercised supervisory authority over Plaintiff at TD1.

26. Defendant ROSARIO E. MONTERO ("MONTERO") is a Police Officer employed by the NYPD who, during the relevant period, was assigned to TD1.

27. At all relevant times, the individual defendants acted within the scope of their NYPD employment or exercised authority arising from their official positions in connection with the acts and omissions alleged herein.

BACKGROUND

I. Adult Sexual Grooming and the Exploitation of Workplace Authority

28. Adult sexual grooming is a process through which an individual deliberately establishes trust, cultivates personal or professional dependence, and gradually introduces sexual

expectations or conduct for purposes of exploitation. Unlike overt sexual coercion, grooming may begin with seemingly benevolent behavior, including mentorship, professional assistance, emotional support, protection, and expressions of personal concern.

29. In *The Psychology of Adult Sexual Grooming: Sinnamon's Seven-Stage Model of Adult Sexual Grooming*, Grant Sinnamon (2017) describes a psychological framework involving seven stages: selecting the victim, gathering information, gaining personal connection, meeting the victim's needs and establishing credibility, priming the target, instigating sexual contact, and controlling the victim. The model explains how trust, perceived vulnerability, and personal dependence can be exploited to blur professional and sexual boundaries.

30. Workplace hierarchies may provide conditions conducive to such manipulation. A supervisor who exercises authority over assignments, schedules, evaluations, discipline, and professional advancement occupies a position of institutional power. When that supervisor also provides protection, accommodation, or assistance, a subordinate employee may become concerned that rejecting unwanted sexual attention will jeopardize both the professional relationship and the employment benefits or protection associated with it.

31. The psychological significance of grooming lies partly in the gradual transformation of an apparently supportive relationship into one involving unwanted sexual expectations. An employee's continued professional contact, initial gratitude, reluctance to confront a supervisor, or delayed reporting must therefore be understood in the context of the relationship, the employee's circumstances, and the supervisor's authority. Such conduct does not, by itself, establish that subsequent sexual attention was welcomed.

32. Grooming is a psychological framework for understanding patterns of manipulation and exploitation, not an independent cause of action under the New York State

Human Rights Law or the New York City Human Rights Law. Its relevance in employment-discrimination litigation concerns the surrounding circumstances of alleged sexual harassment, the exercise of supervisory authority, the employee's responses, and the consequences of refusing or reporting unwanted sexual conduct.

II. Maria Delacruz's Personal and Professional Background: Sexual Exploitation, Workplace Harassment, and the Fear of Losing Her Livelihood

A. Upbringing, Education, and Early Experiences with Unwanted Sexual Attention

33. Plaintiff MARIA A. DELACRUZ ("DELACRUZ") was raised by strict parents who emphasized respect, obedience, education, humility, and hard work. She learned to respect authority, follow instructions, avoid confrontation, and treat others with kindness, even when she was uncomfortable.

34. Beginning at approximately fourteen years old, DELACRUZ noticed that people frequently focused on her physical appearance, including her face, eyes, and body. She was described as having an "exotic look" or a "lesbian look," and she increasingly felt that people were more interested in her appearance than her intelligence, education, ambitions, or character.

35. DELACRUZ was an accomplished student who participated in softball during high school and pursued higher education. She wanted to be recognized for her abilities, not reduced to assumptions about her sexuality or physical attractiveness.

36. As she matured, DELACRUZ discovered that her kindness and respectful demeanor were sometimes interpreted as flirting or sexual interest. She struggled to confront unwanted advances because she had been raised to respect authority and avoid conflict.

37. These experiences damaged DELACRUZ's confidence. She became increasingly insecure about her appearance, sometimes covering her body to avoid unwanted attention. When

she later began dressing more confidently, she encountered rumors that she was a "whore" or was sleeping with numerous people.

38. DELACRUZ experienced humiliation, depression, anxiety, and difficulty trusting others. She frequently concealed her emotional distress behind a smile because she feared being judged or misunderstood if she disclosed what she was experiencing.

B. Fine Fair Supermarket: Sexual Coercion, Exploitation, and Termination

39. In approximately the fall of 2012, while attending college and struggling to achieve financial independence, DELACRUZ worked as a cashier at Fine Fair Supermarket.

40. DELACRUZ was approximately nineteen years old when the supermarket's owner, a Hispanic male, began directing unwanted sexual attention toward her. He repeatedly commented on her beauty, stared at her buttocks, and made remarks about her eyes and physical appearance.

41. The owner increased DELACRUZ's working hours, allowing her to earn additional money while simultaneously becoming increasingly involved in her personal life.

42. He began sending DELACRUZ unsolicited text messages expressing his desire to see her, telling her that he loved her eyes, and describing how he wanted her to give him a "blowjob."

43. DELACRUZ was frightened and uncomfortable, but she needed her wages to support herself while attending college. She attempted to ignore the advances and continue working.

44. The owner repeatedly pressured DELACRUZ to accompany him to dinner. Eventually, she agreed, hoping that doing so would satisfy him and cause the unwanted sexual attention to stop.

45. Instead, his demands escalated. After another dinner, he told DELACRUZ that he was going to have her for "dessert."

46. The owner drove DELACRUZ to a hotel in Astoria, Queens, supplied her with alcoholic beverages despite her being under twenty-one years old, and coerced her into unwanted sexual intercourse.

47. Over approximately the following four months, DELACRUZ experienced additional sexual encounters with the owner, which she describes as coerced. The dinners stopped, but the sexual encounters continued.

48. During this period, the owner sometimes picked DELACRUZ up in expensive automobiles, including Lamborghini and Ferrari vehicles. DELACRUZ understood that he possessed substantial financial resources and controlled the employment income upon which she depended.

49. Eventually, the owner turned his sexual attention toward another young female cashier and terminated DELACRUZ's employment.

50. DELACRUZ was devastated. She felt used, humiliated, and discarded after being sexually exploited by the person who controlled her employment. She did not know where to turn for assistance.

51. This experience taught DELACRUZ that an employer could initially appear generous and interested in helping her financially, develop sexual expectations, obtain sexual access through pressure and manipulation, and then terminate her employment.

C. Heslop & Kalba: Explicit Sexual Demands and Termination After Refusal

52. Between approximately the winter of 2012 and May 2016, DELACRUZ held various cashiering and bookkeeping positions. Following her experience at Fine Fair, she

increasingly preferred working for female managers and supervisors because she no longer trusted the intentions of male employers.

53. In approximately May 2016, DELACRUZ began working as a legal secretary at Heslop & Kalba, a law firm in Downtown Brooklyn. She believed the position would allow her to develop professional skills and advance beyond the employment circumstances she had previously endured.

54. Shortly after hiring DELACRUZ, attorney Garfield Andre Heslop ("HESLOP") began commenting on her face, buttocks, and physical appearance.

55. HESLOP questioned DELACRUZ about her nationality. Upon learning that she was Dominican, he became increasingly sexually suggestive toward her.

56. HESLOP repeatedly demanded that DELACRUZ wear skirts so that he could look at her legs. He offered to give her money to purchase clothing that satisfied his personal preferences.

57. HESLOP also instructed DELACRUZ to wear her hair loose rather than in a ponytail because he preferred how she looked with her hair down.

58. Almost daily, HESLOP pressured DELACRUZ to accompany him to dinner. She repeatedly declined and attempted to discourage his attention without antagonizing the person who controlled her employment.

59. HESLOP also demanded that DELACRUZ remain at the office after normal working hours, even when there was no legitimate business reason for her continued presence. DELACRUZ became afraid of being alone with him.

60. When HESLOP learned that DELACRUZ attended a gym, he obtained a Planet Fitness membership and attempted to arrange for them to exercise together.

61. As DELACRUZ continued refusing his advances, HESLOP became increasingly explicit. He demanded "blowjobs" and told DELACRUZ that he wanted her to "fuck him."

62. DELACRUZ refused to engage in sexual activity with HESLOP. She remembered what had happened at Fine Fair and was determined not to allow another employer to obtain sexual access to her through pressure and manipulation.

63. In approximately September 2016, after DELACRUZ repeatedly rejected his demands, HESLOP terminated her employment.

64. DELACRUZ was humiliated and financially harmed. She believed that she had lost another employment opportunity because a male employer valued sexual access to her more than her professional abilities.

65. The contrast between her experiences at Fine Fair and Heslop & Kalba was particularly devastating. At Fine Fair, DELACRUZ had been coerced into sexual encounters and ultimately terminated. At Heslop & Kalba, she refused sexual demands and was terminated anyway.

66. DELACRUZ began to believe that, regardless of whether she complied with or rejected a supervisor's sexual demands, she could lose the employment she needed to survive.

D. Sing Sing Correctional Facility: Sexual Harassment in a Male-Dominated Law-Enforcement Environment

67. Between approximately September 2016 and March 2018, DELACRUZ worked as a case manager at a homeless shelter near John F. Kennedy International Airport, where she worked under female management and did not experience comparable harassment.

68. In March 2018, DELACRUZ began working as a correction officer at Sing Sing Correctional Facility, hoping to establish a stable career in law enforcement and provide for herself and her child.

69. Instead, DELACRUZ encountered additional sexually explicit behavior from inmates and male supervisory personnel.

70. Inmates repeatedly exposed their penises to DELACRUZ while she performed her rounds. When she attempted to address the behavior by issuing disciplinary tickets, she was questioned about why she was writing so many tickets.

71. Male supervisors also subjected DELACRUZ to unwanted sexual comments and propositions. On one occasion, a supervisor told her, "I would love to put it in your ass."

72. Other male personnel commented on her attractiveness and described sexual acts they wanted to perform with her, including statements suggesting what they would do to her if she were not married.

73. DELACRUZ did not complain formally because she feared retaliation. She had already experienced the consequences of sexual exploitation at Fine Fair and the consequences of rejecting sexual demands at Heslop & Kalba.

74. To reduce her exposure to harassment, DELACRUZ eventually began working the midnight tour. Even then, inmates continued exposing themselves during her rounds, and her efforts to document the conduct attracted scrutiny.

75. DELACRUZ felt that she could not escape sexual harassment even in a profession supposedly governed by discipline, rules, and supervisory accountability.

76. The experience reinforced her fear that male supervisors could sexualize her, disregard her objections, and exercise authority over her career if she complained.

E. Education, Military Service, and Professional Accomplishments

77. DELACRUZ earned a Bachelor of Arts in Criminal Justice from John Jay College of Criminal Justice in 2016.

78. While continuing her NYPD career, DELACRUZ pursued additional education and military training.

79. In approximately 2024, DELACRUZ joined the United States Army Reserve Officers' Training Corps program through the City College campus while attending John Jay College.

80. DELACRUZ did not experience sexual harassment during ROTC. She observed that sexual-harassment prevention and professional accountability were treated seriously within that environment.

81. In May 2026, DELACRUZ earned a Master of Arts in Emergency Management from John Jay College of Criminal Justice, graduating Magna Cum Laude with a 3.7 grade point average, reflecting her academic excellence and sustained commitment to professional advancement while serving as an NYPD police officer.

82. On September 28, 2026, DELACRUZ received a commission as a Second Lieutenant in the United States Army, assigned to logistics.

83. These accomplishments reflect DELACRUZ's sustained commitment to education, professional advancement, leadership, and public service notwithstanding the sexual harassment and workplace difficulties she describes.

F. The Lasting Consequences of Sexual Exploitation and the Pattern of Supervisory Manipulation

84. DELACRUZ's previous experiences left her with substantial anxiety, depression, humiliation, insecurity, and difficulty trusting individuals occupying positions of authority.

85. She had experienced male employers who initially appeared willing to help her professionally or financially, only to introduce sexual expectations after she had become dependent upon their assistance.

86. DELACRUZ had also experienced termination after sexual exploitation and termination after refusing sexual demands. These experiences made her particularly fearful that rejecting a supervisor's advances could threaten her livelihood.

87. DELACRUZ increasingly attempted to protect herself by avoiding conflict, limiting social interactions, remaining guarded around coworkers, and concealing her distress rather than confronting individuals who possessed authority over her employment.

88. She frequently worried that supervisors would be believed over her because of their positions and that complaints concerning sexual misconduct could damage her professional reputation or career.

89. DELACRUZ did not believe that smiling, remaining polite, accepting legitimate assistance, or continuing to communicate with a supervisor constituted an invitation for sexual attention.

90. Nevertheless, she had repeatedly experienced circumstances in which men interpreted her kindness or dependence upon professional assistance as an opportunity to pursue her sexually.

91. These experiences are essential to understanding what subsequently occurred when Captain Amanjeet S. Sandhu became her commanding officer at TD1.

92. When DELACRUZ initially met SANDHU, she knew that he was married and had two sons. She had heard favorable comments about his character and reputation and initially believed that he was a trustworthy supervisor who genuinely wanted to assist her.

93. SANDHU subsequently provided DELACRUZ with professional assistance, accommodations, and apparent protection from hostility within the command, causing her to develop trust in him.

94. When SANDHU later declared his love for DELACRUZ and expressed his desire to become her lover rather than remain her supervisor, DELACRUZ immediately recognized similarities to her previous employment experiences.

95. DELACRUZ recalls her reaction in unmistakable terms: "FUCKKK, I'm back in the same trap all over again."

96. SANDHU's declaration brought back memories of the law firm, where the employer she believed would provide professional opportunity had instead demanded sexual favors and terminated her after she refused.

97. DELACRUZ feared that rejecting SANDHU would jeopardize the protection, accommodations, and professional assistance she had come to depend upon, while tolerating his sexual attention would expose her to further exploitation.

98. Her apprehension was not simply an abstract fear of confrontation. It arose from her lived experiences of sexual coercion, unwanted sexual demands, employment termination, and the consequences of challenging individuals who controlled her livelihood.

99. DELACRUZ had entered the NYPD hoping to escape these experiences and build a professional career. Instead, she believed that the same pattern of trust, supervisory dependence, sexual expectations, and fear of retaliation was developing again.

100. These circumstances provide the factual background necessary to understand DELACRUZ's subsequent interactions with SANDHU, her efforts to avoid provoking his anger, her continued communication with him despite unwanted sexual advances, and the emotional consequences of the harassment alleged in this complaint.

III. The NYPD's Culture of Debauchery

A. Years of Documented Deficiencies in Sexual Harassment Prevention, Investigation, and Supervisory Accountability

101. Long before the events giving rise to this action, the New York City Police Department ("NYPD") had been subjected to repeated examinations of its equal employment opportunity practices by the New York City Equal Employment Practices Commission ("EEPC"), an independent municipal oversight body authorized under Chapter 36 of the New York City Charter to audit, evaluate, and monitor municipal employment practices and require corrective action.

102. These examinations documented deficiencies in the NYPD's administration of equal employment opportunity requirements, including employee training, sexual harassment complaint procedures, investigative practices, documentation, and supervisory accountability.

103. On July 18, 2017, the EEPC issued its preliminary determination concerning an audit of the NYPD's employment practices and procedures covering January 1, 2014, through December 31, 2016. The determination subsequently became final, and the EEPC prescribed eight corrective actions.

104. The EEPC determined that the NYPD had failed to demonstrate that it established an adequate training plan to ensure existing employees, including managers and supervisors, received instruction concerning unlawful discrimination, sexual harassment prevention, complaint procedures, investigations, and employee rights and responsibilities.

105. The EEPC reported that approximately 43 percent of the NYPD workforce had received EEO training during the audit period. Although newly appointed employees received training through orientation, the Department had not demonstrated an adequate plan for training its existing personnel.

106. The EEPC further found that the NYPD had not demonstrated that all EEO investigators were appropriately trained and knowledgeable concerning the laws, procedures, and responsibilities governing discrimination investigations.

107. The EEPC also identified deficiencies in the documentation of meetings and decisions between the Police Commissioner and the principal EEO professional concerning the administration and operation of the Department's EEO program.

108. These findings concerned institutional mechanisms intended to prevent discriminatory conduct, investigate employee complaints, and hold personnel accountable for violations of employment discrimination policies.

109. Several years later, the EEPC conducted a separate examination specifically addressing the NYPD's Sexual Harassment Prevention and Response Practices for January 1, 2019, through December 31, 2020. On June 7, 2021, the EEPC issued its preliminary determination to then-Police Commissioner Dermot Shea.

110. The subsequent audit documented that the NYPD maintained written sexual harassment policies, distributed prevention materials, and operated mandatory training programs. Nevertheless, the EEPC identified deficiencies in essential procedures governing the handling, documentation, review, and resolution of sexual harassment complaints.

111. The NYPD's own complaint-tracking records disclosed 528 internal EEO complaints during the 2019–2020 audit period, including 66 complaints alleging sexual harassment, representing 12.5 percent of the internal complaints.

112. The audit also recorded 145 external complaints filed during the review period.

113. The EEPC found that the NYPD's EEO Division standard operating procedures failed to incorporate several requirements governing the investigation and resolution of

discrimination and sexual harassment complaints, including procedures requiring conclusive investigative reports within 90 days, documentation and notification of investigative delays, and specified substantive information in final investigative reports.

114. The deficiencies also concerned written confirmation of complaint withdrawals, terminations, or resolutions; documentation of agency-head review and disposition; and notice to the parties concerning investigative matters transferred following an external complaint.

115. The EEPC separately identified a deficiency involving the absence of a required written notification to a respondent concerning the conclusion and outcome of an investigated complaint.

116. The EEPC found that the NYPD had not demonstrated adequate coordination concerning external sexual harassment complaints and litigation, including communication between its legal and principal EEO functions and responsibility for investigating and responding to such matters.

117. The EEPC further found that it could not confirm, from the records supplied, that every EEO investigator had received the required training concerning EEO laws, complaint investigations, and applicable departmental procedures.

118. The audit also identified inadequate documentation of directives and decisions between the Department's leadership and principal EEO professional concerning programs, policies, and procedures addressing sexual harassment.

119. Particularly significant, the EEPC found that the NYPD's evaluation forms for sergeants, lieutenants, probationary captains, and deputy chiefs did not contain the required EEO performance rating addressing supervisory responsibilities for equitable employment decisions and impartial treatment of employees.

120. These omissions concerned the very supervisory ranks entrusted with directing subordinate officers, controlling assignments, enforcing departmental rules, reporting misconduct, and preventing workplace harassment.

121. The NYPD's policies nevertheless recognized that uniformed and civilian supervisors and managers were mandatory reporters responsible for notifying the appropriate EEO officials when they received complaints or otherwise became aware of discrimination, harassment, or retaliation.

122. Accordingly, the EEPC's findings documented deficiencies not merely in the existence or distribution of written policies, but in the administrative systems through which allegations of sexual harassment were investigated, documented, communicated, reviewed, and incorporated into supervisory accountability.

123. These findings preceded plaintiff's experiences at Transit District 1 and Transit District 32 and concerned policies and procedures applicable to the NYPD's uniformed supervisory structure.

124. The repeated necessity for external oversight and corrective action provides institutional context for the allegations that follow concerning the conduct of commanding officers, supervisors, and managers, including the manner in which allegations of sexual misconduct and retaliation were handled within the Department.

B. The NYPD's Internal Affairs Investigations, Sexual Misconduct, and Executive Accountability

125. On March 25, 2025, the New York City Commission to Combat Police Corruption (“CCPC”) issued its Twenty-Second Annual Report examining the NYPD's investigation of corruption and serious misconduct, including the performance of its Internal

Affairs Bureau ("IAB"), the adequacy of investigative procedures, and the Department's disciplinary accountability mechanisms.

126. The CCPC, established by Mayoral Executive Order No. 18 in 1995, is responsible for independently monitoring the NYPD's efforts to detect, investigate, control, and deter corruption and serious misconduct among members of the service.

127. The report included findings from reviews of IAB investigations closed during 2022 and 2023 and separately addressed significant developments within the Department following the appointment of Police Commissioner Jessica S. Tisch in November 2024.

128. In its preface, the CCPC identified the departure of former Chief of Department Jeffrey Maddrey amid allegations that he sexually harassed a subordinate female employee and exchanged overtime opportunities for sexual favors.

129. The CCPC reported that investigations concerning Maddrey's alleged misconduct had been launched by the United States Attorney's Office for the Southern District of New York, the New York County District Attorney's Office, and the New York City Department of Investigation.

130. The allegations concerned the Department's highest-ranking uniformed executive and involved the alleged exploitation of authority over a subordinate employee's compensation and overtime opportunities for sexual purposes.

131. The CCPC further documented substantial changes within IAB following Tisch's appointment, including the removal and subsequent retirement of Chief Miguel Iglesias, then IAB's commanding officer, and the transfer of Chief Chris Morello, IAB's executive officer.

132. The personnel changes extended to the entire Special Investigations Unit, whose members were transferred out of IAB. That unit was responsible for investigating allegations

involving high-ranking NYPD employees, Internal Affairs personnel, Integrity Control Officers, and members assigned to sensitive positions.

133. Tisch thereafter appointed Chief Edward Thompson and Inspector Joseph DiBartolomeo as IAB's commanding officer and executive officer, respectively.

134. These developments occurred against the backdrop of the CCPC's documented examination of longstanding investigative deficiencies within IAB, including failures to identify and interview witnesses, obtain potentially corroborating evidence, accurately assess allegations, and pursue necessary investigative steps before closing cases.

135. The CCPC reported that, among investigations reviewed in 2022, it identified failures to interview witnesses in twelve cases, including available civilian witnesses and members of the service.

136. Of particular significance, the CCPC examined an investigation involving an NYPD officer accused by his adult daughter of sexually molesting her over a period of years while she was a minor.

137. Although the assigned prosecutor reportedly found the complainant credible, the prosecutor declined criminal prosecution because the evidence was insufficient to establish guilt beyond a reasonable doubt.

138. The CCPC found that IAB investigators failed to pursue several potentially corroborating investigative measures, including interviewing witnesses to whom the complainant had previously disclosed the alleged abuse, obtaining employment records relevant to the alleged incidents, independently verifying evidence concerning the termination of her cellular telephone service, and following up on a proposed controlled telephone call.

139. IAB closed the sexual-assault allegation as unsubstantiated. The CCPC concluded that the allegation might have been substantiated had investigators completed the additional investigative steps.

140. The CCPC specifically recommended consultation with the Department Advocate's Office before closing certain sexual-misconduct investigations, recognizing the distinction between the burden of proof required for criminal prosecution and the lower evidentiary burden applicable to administrative discipline.

141. The Department Advocate's Office subsequently determined that sufficient evidence existed to pursue administrative charges concerning the alleged sexual abuse. However, the administrative prosecution could not proceed because the available evidence did not establish that the alleged conduct occurred during the officer's period of NYPD employment.

142. This investigation demonstrated the consequences of failing to pursue corroborating evidence and properly distinguish criminal prosecution standards from administrative accountability when evaluating allegations of sexual misconduct.

143. The CCPC also reported that, in 2023, IAB established a new investigative group dedicated to allegations of sexual misconduct against members of the service. The group did not become fully operational until the final quarter of that year.

144. Thus, before plaintiff's subsequent experiences, the Department had received repeated external evaluations identifying deficiencies in its investigative and accountability practices, while maintaining specialized investigative structures responsible for allegations against senior executives and sexual misconduct by Department personnel.

145. The allegations involving Maddrey and the sweeping changes in Internal Affairs under Tisch's administration further demonstrate the institutional significance of supervisory

sexual misconduct and the responsibility of the Department's leadership to ensure impartial investigations, meaningful disciplinary review, and accountability regardless of rank.

146. These documented circumstances provide additional institutional context for plaintiff's allegations concerning the conduct of NYPD commanding officers and supervisors, the exercise of authority over subordinate female employees, the handling of reported misconduct, and the Department's response to employees seeking protection from harassment and retaliation.

C. Comparative Research Summary: NYPD Executive and Supervisory Misconduct

Comparator	Allegations, Conduct, and Relevant Facts	Procedural Status and Significance
Jeffrey Maddrey — Former Chief of Department / Quathisha Epps — Lieutenant	Epps alleged that Maddrey conditioned overtime opportunities on sexual favors. Sexual encounters allegedly occurred inside NYPD Headquarters. Maddrey publicly maintained that their relationship was consensual.	Investigations and litigation. Under *People v. Moreno*, 100 A.D.3d 435 (1st Dep't 2012), knowingly using unauthorized police functions to obtain personal sexual benefits can constitute official misconduct under Penal Law § 195.00(1), irrespective of consent to sexual activity.
Jeremy Scheublin — Inspector	Alleged attempted rape, unwanted sexual contact with a subordinate female officer, and retaliation following a January 1, 2025 incident at the 46th Precinct.	Criminal charges filed July 2026; pleaded not guilty. NYPD termination reported July 2026.
Juan O. Moran — Deputy Inspector / Osmairys A. Avila — Sergeant / Pamela Sosa and Brittany N. Romero — Police Officers	July 2026 civil litigation alleging sexual harassment, unwanted touching, intimidation, discrimination, abuse of supervisory authority, and retaliation involving female subordinates at the 46th Precinct.	Civil allegations not adjudicated.
Trevlyn Headley — Former Lieutenant, Subsequently Sergeant /	Foster's verified counterclaims allege coercive sexual conduct, unwanted sexual contact, psychological manipulation,	Headley v. City of New York, Index No. 155228/2025. On June 11, 2026, Commissioner Tisch approved the

Shatorra Foster — Police Officer	retaliation, and a March 14, 2024 sexual assault inside an NYPD Headquarters dormitory. Separately, Headley was found guilty of unwanted physical contact with another subordinate at a December 19, 2024 department-sponsored holiday party.	administrative findings and imposed forfeiture of 45 vacation days, EEO remedial training, and one year of dismissal probation. The civil allegations remain disputed.
Edward A. Thompson — Chief, Internal Affairs Bureau / Joanna P. Zayas — Detective First Grade	Numerous anonymous tips personally received by counsel alleging an inappropriate sexual relationship between Thompson and his driver, Zayas. Zayas: Hispanic female, Badge No. 4476, Tax No. 942910; NYPD service beginning January 2007; IAB assignment since December 2024; prior assignments including Sanitation Interagency Liaison, Office of Information Technology, and Information Technology Services Division. Reported annual earnings of approximately $168,000 and advancement from Police Officer to Detective First Grade in less than eight years without serving as a case investigator.	Anonymous allegations; relationship, promotions, assignments, and compensation circumstances require corroboration.
Joseph A. DiBartolomeo — Executive Officer, Internal Affairs Bureau / Chrissy Voskerichian — Principal Police Administrative Aide / Jennyliz Sanchez — Lieutenant	Numerous anonymous tips personally received by counsel alleging an inappropriate sexual relationship between DiBartolomeo and Voskerichian; improper award of Special Assignment (SSA) title and compensation to Sanchez despite her never having led a team of investigators; and preferential assignments of Latina female officers based on DiBartolomeo's alleged personal preferences.	Anonymous allegations; underlying conduct unverified.
Bienvenido Martinez — Deputy Chief, Communications Section / Leya's Ansari-Cruz — PPCT	Numerous tips personally received by counsel alleging an inappropriate sexual relationship; multiple salary increases, overtime, assignment of a Category 2 radio	Anonymous allegations require corroboration. Reported litigation and settlement history should be separately documented.

	motor patrol vehicle, and use of the executive officer's designated parking space. Martinez was also named in Balli v. City of New York, reportedly settled for $800,000 without admission of liability.	

IV. Lieutenant Maria I. Franco and Sergeant Sabrina M. Frias: The Hostile Working Environment Preceding Sandhu's Arrival

A. Franco's Initial Hostility Toward Delacruz at Transit District 1

147. In January 2022, plaintiff MARIA A. DELACRUZ ("DELACRUZ") reported to Transit District 1 ("TD1") in New York County as a newly appointed probationary police officer.

148. Defendant Lieutenant MARIA I. FRANCO ("FRANCO"), a Dominican female, served in an administrative supervisory capacity at TD1 and exercised substantial influence over personnel assignments, scheduling, and working conditions.

149. On DELACRUZ's first day at TD1, FRANCO conducted introductions during roll call, where approximately six newly assigned officers were present. When DELACRUZ introduced herself, FRANCO responded with a demeanor that DELACRUZ perceived as noticeably less welcoming than her interactions with the other officers.

150. DELACRUZ had transferred from correctional employment to the NYPD seeking professional advancement and stability. She was unfamiliar with TD1's internal relationships and did not have the departmental connections possessed by certain other newly assigned officers.

151. During her initial weeks, DELACRUZ observed that FRANCO appeared particularly interested in which officers had connections within the Department and who was protecting or assisting them. DELACRUZ became concerned that her lack of established relationships placed her at a disadvantage.

B. The Missing Locker and Franco's Response

152. During approximately her second week at TD1, DELACRUZ reported for duty and discovered that the locker or combination-lock arrangement she had been using was no longer available.

153. DELACRUZ became alarmed because she was responsible for safeguarding her personal belongings and department-issued property. She immediately checked her equipment and belongings but found nothing missing or damaged.

154. DELACRUZ approached FRANCO in the administrative office, explained what had happened, and asked permission to purchase a replacement combination lock at CVS.

155. FRANCO questioned whether anything was missing. After DELACRUZ explained that her property appeared intact, FRANCO permitted her to purchase a replacement but instructed her, in substance, "Yes, go and come back fast."

156. DELACRUZ perceived FRANCO's demeanor as irritated and dismissive, leaving her uncomfortable about seeking supervisory assistance with an unexplained workplace problem.

157. DELACRUZ did not witness anyone remove the locker or lock, did not identify who was responsible, and did not attribute its disappearance to FRANCO. The incident nevertheless contributed to her growing concern that she was unwelcome at TD1.

C. Franco's Statement That the "New Girl" Would Be a Problem and Frias's Participation

158. During the same general period in January 2022, DELACRUZ approached the TD1 desk to request permission to take her meal period.

159. FRANCO was speaking with Sergeant Sabrina M. Frias, who was assigned to the desk and possessed supervisory authority over DELACRUZ.

160. While DELACRUZ stood within hearing distance, FRANCO remarked to Frias, "You see that new girl is going to be a problem."

161. DELACRUZ observed FRANCO standing with her arms crossed and speaking in a manner she perceived as disparaging gossip about a newly assigned subordinate.

162. Frias responded by smiling and laughing, appearing to agree with FRANCO's characterization of DELACRUZ.

163. Neither supervisor identified any misconduct, performance deficiency, or legitimate reason for characterizing DELACRUZ as a problem.

164. Immediately afterward, Frias turned toward DELACRUZ and stated, "Hey, Delacruz, take off the earring. This is a warning."

165. DELACRUZ understood that compliance with uniform regulations was required. However, the timing of Frias's warning, immediately following FRANCO's disparaging remark, left DELACRUZ feeling singled out and humiliated.

166. DELACRUZ was particularly disturbed that two supervisors had negatively characterized her before she had been afforded a meaningful opportunity to establish her professional competence.

167. Because DELACRUZ was a probationary officer, she feared that confronting FRANCO or FRIAS could expose her to unfavorable evaluations, disciplinary scrutiny, or other consequences affecting her continued employment.

D. Franco's Resistance to Delacruz's Childcare Scheduling Needs

168. During 2022, DELACRUZ sought a four-by-four work schedule that would allow her to fulfill her responsibilities as a police officer while ensuring that her son could attend school and board his school bus.

169. FRANCO attempted to assign DELACRUZ to midnight tours, notwithstanding DELACRUZ's explanation that the proposed schedule would interfere with her childcare responsibilities.

170. DELACRUZ believed FRANCO was unwilling to accommodate her circumstances and increasingly regarded her requests as another reason to treat her unfavorably.

171. Lieutenant Dewan Persaud, another TD1 supervisor, intervened on DELACRUZ's behalf and advocated for her placement on the four-by-four schedule.

172. Following Persaud's intervention, DELACRUZ obtained the requested schedule, which allowed her to manage her employment and family responsibilities more effectively.

173. DELACRUZ also preferred the four-by-four arrangement because it reduced her direct contact with FRANCO, who generally worked day tours, and permitted her to work under a supervisor she believed treated her fairly.

174. Rather than confront FRANCO, DELACRUZ increasingly avoided unnecessary interactions with her, fearing that challenging an influential supervisor while on probation could jeopardize her career.

E. Franco's Opposition to Delacruz's Assignment with Captain Sandhu

175. In approximately January 2023, defendant AMANJEET S. SANDHU ("SANDHU"), then a Captain, assumed command of Transit District 1 , began selecting DELACRUZ to accompany him as his driver, with the arrangement becoming increasingly regular by March 2023.

176. DELACRUZ initially welcomed the assignment because she believed working directly with the Commanding Officer might provide professional stability and protection from the hostility she perceived from FRANCO and other supervisors.

177. However, DELACRUZ soon encountered comments suggesting that her assignment was intended to satisfy SANDHU personally rather than serve a legitimate departmental purpose.

178. DELACRUZ recalls FRANCO referring to her as "jefa," a Spanish term meaning female boss, in a manner she understood as mocking her association with SANDHU and implying that she occupied a favored position because of their relationship.

179. DELACRUZ also became aware of comments along the lines of, "Just give her to Maio as his driver, keep the boss happy," which she understood as suggesting that her assignment existed to please SANDHU rather than reflect her professional responsibilities.

180. These comments humiliated DELACRUZ because she was performing an assignment directed by her Commanding Officer, yet her association with him was becoming the subject of workplace speculation and ridicule.

181. In approximately March 2023, DELACRUZ requested time off to travel to the Dominican Republic for surgery. FRANCO opposed the request, but SANDHU intervened and approved the necessary leave.

182. DELACRUZ appreciated SANDHU's assistance because she believed FRANCO was making ordinary employment matters unnecessarily difficult and that the Commanding Officer was willing to protect her.

183. Following DELACRUZ's return from the Dominican Republic in May 2023, SANDHU considered selecting her as his personal assistant.

184. DELACRUZ learned from SANDHU that FRANCO objected to his selection, allegedly telling him, "Take anyone you want but not Maria Delacruz."

185. Although DELACRUZ did not personally hear FRANCO make that statement, SANDHU's account reinforced her belief that FRANCO had developed a personal hostility toward her.

186. DELACRUZ continued serving as SANDHU's driver and spending substantial portions of her working hours in his company, while experiencing increasing speculation concerning the nature of their relationship.

V. Deputy Inspector Amanjeet S. Sandhu: Sexual Grooming, Harassment, and Abuse of Command Authority

A. Sandhu's Cultivation of Delacruz's Dependence Through Supervisory Authority, Preferential Attention, and Increasing Personal Control

187. In November 2022, defendant AMANJEET S. SANDHU ("SANDHU"), then a Captain, assumed command of Transit District 1 ("TD1") in New York County, where plaintiff MARIA A. DELACRUZ ("DELACRUZ") was assigned as a police officer.

188. As Commanding Officer, SANDHU exercised substantial authority over DELACRUZ's assignments, tours of duty, scheduling, leave requests, working conditions, and professional opportunities.

189. DELACRUZ first met SANDHU in December 2022, when he introduced himself at TD1. Later that month, at the command's Christmas party, he shook her hand and gave her a particular stare that she noticed but did not initially consider inappropriate.

190. Beginning in approximately January 2023, SANDHU began selecting DELACRUZ to serve as his driver, frequently separating her from her regular partner, Police Officer Nicholas V. Maio.

191. By approximately March 2023, SANDHU was selecting DELACRUZ almost every workday, particularly after Maio left the NYPD.

192. The assignment required DELACRUZ to accompany SANDHU in departmental vehicles for extended periods, frequently without another personnel present.

193. SANDHU also began requiring DELACRUZ to remain in his office for substantial portions of her tours, including periods when he ate, attended to personal activities, or conducted business that did not require her presence.

194. Eventually, DELACRUZ spent entire tours in SANDHU's office or accompanying him in his departmental vehicle.

195. During these private office encounters, SANDHU frequently directed DELACRUZ to close or lock the office door, leaving her alone with the commanding officer who controlled her employment circumstances.

196. DELACRUZ complied because SANDHU was her superior officer, and she did not believe she could disregard his instructions without risking professional consequences.

197. SANDHU also expected DELACRUZ to accompany him to departmental functions and social activities, making statements such as, "Are you going? If you're going, I'm going."

198. When DELACRUZ declined invitations or expressed reluctance to accompany him, SANDHU became visibly angry. She particularly remembered the anger in his eyes and feared that refusing him would affect how he treated her during her next tour.

199. Other officers noticed the unusual amount of time DELACRUZ spent with SANDHU and began making comments and assumptions about their relationship.

200. DELACRUZ became increasingly uncomfortable with the speculation and began limiting her interactions with coworkers, frequently moving between SANDHU's assignments, his office, and the locker room to avoid further gossip.

201. At the same time, DELACRUZ was experiencing hostility from Lieutenant MARIA I. FRANCO ("FRANCO") and other supervisory personnel at TD1.

202. In approximately March 2023, DELACRUZ needed time off to travel to the Dominican Republic for surgery. FRANCO opposed approving the request, but SANDHU intervened and authorized the leave.

203. SANDHU also accommodated DELACRUZ's responsibilities involving her son, including school activities, scheduling difficulties, vacation requests, and other family obligations.

204. He assisted with certain assignments, including work in the yard, and provided school-related and vehicle-related accommodations, sometimes without DELACRUZ expressly requesting them.

205. These accommodations were significant because DELACRUZ was attempting to maintain her NYPD career while raising her son and managing increasingly difficult workplace relationships.

206. Following DELACRUZ's return from the Dominican Republic in approximately May 2023, SANDHU proposed selecting her as his personal assistant.

207. FRANCO objected to that selection, expressing that SANDHU should choose someone other than DELACRUZ. The accounts concerning whether the assistant designation was ultimately formalized differ, but DELACRUZ continued serving as SANDHU's driver and spending substantial time in his company.

208. SANDHU acknowledged FRANCO's hostility toward DELACRUZ and defended DELACRUZ against certain supervisory treatment, reinforcing her belief that he was protecting her.

209. DELACRUZ initially regarded SANDHU as a married father of two sons, a respected commanding officer, and someone who genuinely cared about her professional well-being.

210. She did not initially interpret his assistance as sexual. She believed she had finally found a supervisor willing to protect her from the hostility she was experiencing.

211. That trust was particularly significant because DELACRUZ had previously experienced sexual coercion and harassment by male employers who initially appeared helpful or supportive.

212. At Fine Fair Supermarket, DELACRUZ had experienced an employer who increased her working hours, provided financial opportunities, progressively demanded sexual access, coerced her into unwanted intercourse, and ultimately terminated her employment.

213. At Heslop & Kalba, DELACRUZ had experienced another employer who made explicit sexual demands, including demands for "blowjobs" and sexual intercourse, before terminating her employment after she refused.

214. Those experiences left DELACRUZ fearful that accepting assistance from a male employer could eventually expose her to sexual demands, while rejecting those demands could jeopardize her livelihood.

215. SANDHU's conduct placed DELACRUZ in a similar position of professional dependence. He controlled matters important to her employment and family responsibilities, provided protection she believed other supervisors were unwilling to provide, and simultaneously expected increasingly unrestricted personal access to her.

216. The progression from professional assistance to private access, isolation, demands for companionship, and anger when she refused was consistent with a pattern of adult sexual

grooming in which supervisory authority and apparent protection were used to cultivate dependence and weaken professional boundaries.

B. Sandhu's Insistence That Delacruz Call Him "Amanjeet"

217. Beginning in approximately June 2023, SANDHU repeatedly demanded that DELACRUZ address him as "Amanjeet" rather than "Sandhu" or by his supervisory title.

218. DELACRUZ initially refused, explaining that he was her commanding officer and that addressing him by his first name was unprofessional.

219. SANDHU persisted, emphasizing that DELACRUZ was personal to him and questioning her loyalty when she resisted.

220. DELACRUZ became increasingly uncomfortable because SANDHU treated her effort to preserve a professional boundary as a personal rejection.

221. Eventually, DELACRUZ began calling him "Amanjeet" because she feared his anger and the possibility that he would withdraw the accommodations and protection she had come to depend upon.

222. Her compliance did not reflect romantic interest or a desire for intimacy. It reflected her fear of antagonizing a commanding officer who exercised substantial control over her employment.

C. Sandhu's Escalating Sexual Comments About Delacruz's Body

223. During 2023, SANDHU increasingly directed sexually explicit comments toward DELACRUZ while she was assigned to drive him and spend time in his office.

224. SANDHU commented on DELACRUZ's breasts, buttocks, face, eyes, and body, including referring to her as a Latina with large buttocks and making remarks about her “big Dominican booty.”

225. He repeatedly stated, “If I was your man, I would slap that ass all the time.”

226. SANDHU also remarked that DELACRUZ's buttocks were becoming larger, including when she stood up to leave his office, and made comments such as, “That ass is huge.”

227. While DELACRUZ sat on the sofa in his office reading or speaking with him, SANDHU stared at her breasts and sometimes bit his lip while looking at her chest.

228. SANDHU also suggested that DELACRUZ remove her bullet-resistant vest so she could be more comfortable while sitting in his office, despite having already directed repeated sexual attention toward her breasts.

229. DELACRUZ was disturbed that ordinary interactions with her commanding officer had become occasions for comments about her body and expressions of his sexual interest.

230. DELACRUZ objected to these remarks, responding on different occasions, "What the fuck? Stop," "Can you please stop saying that?" and "Oh my God, what the fuck?"

231. SANDHU nevertheless continued making similar comments, sometimes stopping temporarily before resuming the same behavior.

232. He also told DELACRUZ about dreams in which he was having sex with her and repeatedly described his desire to have sex with her.

233. DELACRUZ responded, "Cut it out. I don't want to hear it," but SANDHU continued expressing his sexual attraction and desire for a relationship.

234. The comments were particularly degrading to DELACRUZ because they reproduced the same sexual objectification she had experienced at previous employers, where male supervisors focused on her breasts, buttocks, clothing, and appearance rather than her professional abilities.

235. DELACRUZ had joined the NYPD to develop a law-enforcement career, not to have another employer comment upon her body or treat her continued employment relationship as an opportunity for sexual access.

D. Sandhu's Two Incidents of Changing His Clothing in Delacruz's Presence

236. On one occasion during her assignment at TD1, DELACRUZ opened the door to SANDHU's office and discovered him with his pants halfway down.

237. DELACRUZ immediately exclaimed, "Oh my God," and closed the door because she had not expected to encounter her commanding officer partially undressed.

238. Rather than allowing DELACRUZ to remain outside, SANDHU instructed her, "No, no, no, come in."

239. When DELACRUZ entered, SANDHU was still pulling up his pants. He was wearing white underwear and a tank top, and DELACRUZ could see the outline of his penis through his underwear.

240. DELACRUZ was shocked that SANDHU had insisted she enter while he remained partially undressed. She felt uncomfortable but struggled to respond because he was her commanding officer.

241. On a separate occasion, DELACRUZ was sitting in SANDHU's office eating while he prepared for a meeting.

242. Without warning, SANDHU stood in front of DELACRUZ, lowered his pants, and began changing his clothing while facing her.

243. DELACRUZ exclaimed, "Are you serious?" SANDHU dismissed her objection and continued changing.

244. DELACRUZ believed that SANDHU wanted her to observe his exposed body. She was embarrassed and disturbed and, after he finished changing, grabbed her food and left the office.

245. These were two separate incidents in which DELACRUZ was exposed to her commanding officer's partially undressed body without having requested or welcomed that exposure.

246. The incidents contributed to DELACRUZ's growing concern that SANDHU was deliberately crossing sexual and professional boundaries while expecting her to continue working alone with him.

E. Sandhu's Unwanted Attempt to Kiss Delacruz

247. On another occasion during 2023, SANDHU directed DELACRUZ to obtain the keys to a departmental vehicle and accompany him on a drive.

248. After they had been driving for a period of time, SANDHU instructed DELACRUZ to pull over, and they stopped and continued speaking near the departmental vehicle.

249. During that encounter, SANDHU moved toward DELACRUZ and attempted to kiss her against her wishes.

250. DELACRUZ immediately pulled away and pushed him back, declaring, "No, you are married. Are you crazy?"

251. SANDHU became angry and questioned her refusal, stating, "What the fuck? What don't I have that you don't want me? Why can't I be with you? What's going on?"

252. DELACRUZ repeatedly told SANDHU that he was married and that his conduct was inappropriate.

253. Rather than accepting her refusal, SANDHU continued expressing anger and demanding explanations for why DELACRUZ did not want to be with him.

254. After they resumed driving, SANDHU continued professing his love and questioning why she would not enter a relationship with him.

255. DELACRUZ largely remained quiet because she feared provoking further anger while alone with her commanding officer in a departmental vehicle.

256. She felt trapped between rejecting unwanted physical intimacy and preserving her employment relationship with the person controlling her assignments, scheduling, and other working conditions.

257. The incident reinforced DELACRUZ's fear that SANDHU did not regard her refusal as a boundary to be respected, but as an obstacle he expected her to overcome.

F. October 11, 2023: Sandhu's Declaration of Love and Delacruz's Fear of Being Trapped Again

258. On October 11, 2023, while DELACRUZ was off duty at home, SANDHU sent her a lengthy text message expressing his love for her and his desire to pursue a romantic relationship.

259. SANDHU told DELACRUZ that he wanted her to regard him as a lover rather than as her supervisor, expressed a desire for her to return his feelings, and indicated that he would leave his wife to be with her.

260. DELACRUZ was stunned. She became emotional, cried, and struggled to understand how the commanding officer she had trusted for professional protection was now expecting a romantic or sexual relationship.

261. Her reaction was shaped by the sexual exploitation and employment retaliation she had experienced before joining the NYPD.

262. DELACRUZ immediately thought, "FUCKKK, I'm back in the same trap all over again."

263. She recalled what had happened at Heslop & Kalba, where an employer initially provided a professional opportunity but subsequently demanded sexual favors and terminated her employment when she refused.

264. DELACRUZ feared that directly rejecting SANDHU could cause him to abandon her professionally, leaving her exposed to the hostility she believed she was already experiencing from other TD1 supervisors.

265. She also feared that continued communication with SANDHU would reinforce workplace rumors suggesting that she was sexually involved with him.

266. DELACRUZ responded diplomatically because she did not know how to reject SANDHU without risking his anger or losing his assistance.

267. Her attempts to avoid confrontation were not expressions of consent or romantic interest. They reflected her fear of repeating previous experiences in which rejecting an employer's sexual demands had preceded the loss of her employment.

268. Following the October 11, 2023 message, SANDHU continued contacting DELACRUZ frequently, including daily text messages, extended conversations, and telephone calls lasting approximately thirty to forty minutes while she drove home after work.

269. SANDHU also communicated with DELACRUZ through WhatsApp, extending his personal access to her beyond ordinary working hours and departmental communication channels.

270. His messages repeatedly expressed love, infatuation, and the desire for a relationship, sometimes accompanied by apologies for having those feelings.

271. DELACRUZ felt pressured to continue responding because SANDHU remained her commanding officer and an important source of assistance concerning her working conditions.

272. What DELACRUZ initially believed was professional protection had developed into a situation in which the same supervisor repeatedly sought sexual and romantic access while retaining substantial influence over her employment.

G. December 2023: Unwanted Physical Contact and Sexual Demands at the PBMS Christmas Party

273. In December 2023, approximately two weeks before a Patrol Borough Manhattan South ("PBMS") Christmas party, SANDHU repeatedly pressured DELACRUZ to attend the event with him.

274. SANDHU told her, "Come with me. You have to come with me. There's going to be a competition, and I want you to be in it."

275. DELACRUZ repeatedly declined, but SANDHU continued insisting, eventually stating, "Please come with me. I already bought the ticket. I'm not taking no for an answer."

276. Because DELACRUZ was uncomfortable attending the event alone with SANDHU, she agreed to attend only if she could bring a female friend.

277. DELACRUZ wanted someone she trusted to accompany her because she feared that SANDHU might attempt further inappropriate sexual conduct outside the command.

278. DELACRUZ arrived at the party with her friend at approximately 9:00 p.m. SANDHU appeared excited to see her and had arranged seating so that DELACRUZ sat beside him, with SANDHU on her left and her friend on her right.

279. DELACRUZ observed SANDHU drinking alcoholic beverages during the event. At one point, he obtained drinks and returned to the table.

280. After DELACRUZ took several sips of her drink, SANDHU suddenly grabbed her left arm and pulled her toward him.

281. SANDHU declared, "You're coming with me tonight," and insisted that they would leave together and sleep together.

282. DELACRUZ immediately refused, responding, "No, we're not. I'm not leaving with you. I brought my friend. I'm going with her."

283. SANDHU continued holding her arm despite her refusal, causing DELACRUZ physical discomfort.

284. DELACRUZ's friend witnessed the incident and intervened, telling SANDHU to release DELACRUZ because he was hurting her.

285. After SANDHU released her arm, DELACRUZ observed visible redness where he had grabbed her.

286. SANDHU's demeanor changed abruptly from cheerful and excited to visibly angry after DELACRUZ refused to leave with him.

287. SANDHU subsequently offered to obtain another drink, walked away, and never returned to the table. He left the event without saying goodbye, prompting other attendees to ask DELACRUZ where he had gone.

288. DELACRUZ was shaken that her commanding officer had physically grabbed and hurt her while insisting that she accompany him for sex, despite her repeated refusal and the presence of a witness.

289. DELACRUZ feared returning to TD1 because she did not know whether SANDHU would retaliate against her for rejecting him in front of her friend.

290. The incident demonstrated that SANDHU's conduct was not limited to private comments or expressions of romantic interest; he had used physical force to accompany an explicit demand for sexual intimacy.

H. The Sexual Rumors, Sandhu's Wife, and Delacruz's Continued Dependence

291. As DELACRUZ continued accompanying SANDHU during official assignments, rumors circulated within TD1 suggesting that she was sexually involved with him.

292. These rumors humiliated DELACRUZ because she had not agreed to a sexual relationship with SANDHU and was carrying out assignments directed by her commanding officer.

293. She increasingly isolated herself from coworkers because she feared that anything she said or did would be interpreted as further evidence of a sexual relationship that she maintained did not exist.

294. During this period, DELACRUZ also received an unwanted telephone call from SANDHU's wife, who questioned her about communicating with SANDHU and suggested that DELACRUZ was involved with her husband.

295. DELACRUZ angrily denied having a sexual relationship with SANDHU and rejected the accusation.

296. The encounter compounded her humiliation because SANDHU had been the person directing unwanted sexual advances toward her, yet DELACRUZ was being confronted and blamed for the situation.

297. By July 2024, the sexual rumors had contributed to serious workplace hostility, including a confrontation in the women's locker room during which Police Officer ROSARIO E. MONTERO accused DELACRUZ of "fucking the captain."

298. DELACRUZ believed that the rumors, supervisory hostility, and increasingly confrontational treatment within TD1 made continued employment there untenable.

299. DELACRUZ sought a transfer because she wanted to escape the humiliation, intimidation, and sexually hostile conditions that had developed around her association with SANDHU.

I. Delacruz's Transfer to TD32 and Sandhu's Continued Involvement in Her Employment

300. Following the deterioration of her working environment at TD1, DELACRUZ sought reassignment to another transit command.

301. Defendant TAMECCA GREENE ("GREENE"), then a Captain, assumed command of Transit District 32 ("TD32") became involved in the reassignment discussions and represented that she would protect DELACRUZ from bullying, workplace rumors, and further mistreatment if DELACRUZ transferred to Transit District 32 ("TD32").

302. DELACRUZ accepted the opportunity because she believed that working under a female commanding officer would allow her to escape rumors involving SANDHU and obtain a fresh professional start.

303. After transferring to TD32 in 2024, DELACRUZ continued communicating with SANDHU because she believed he could assist her with the difficulties she subsequently experienced under GREENE.

304. SANDHU remained connected to DELACRUZ's employment circumstances through communications involving GREENE, and DELACRUZ continued to regard him as someone who might intervene on her behalf.

305. Her continued communication with SANDHU did not mean that she welcomed his sexual behavior. DELACRUZ believed she needed professional assistance and feared losing another person who might help her escape an increasingly difficult workplace situation.

306. This dependence was especially distressing because SANDHU had already subjected her to unwanted sexual comments, romantic demands, and physical advances.

J. Sandhu's Transmission of a Pornographic Video Through WhatsApp in 2024

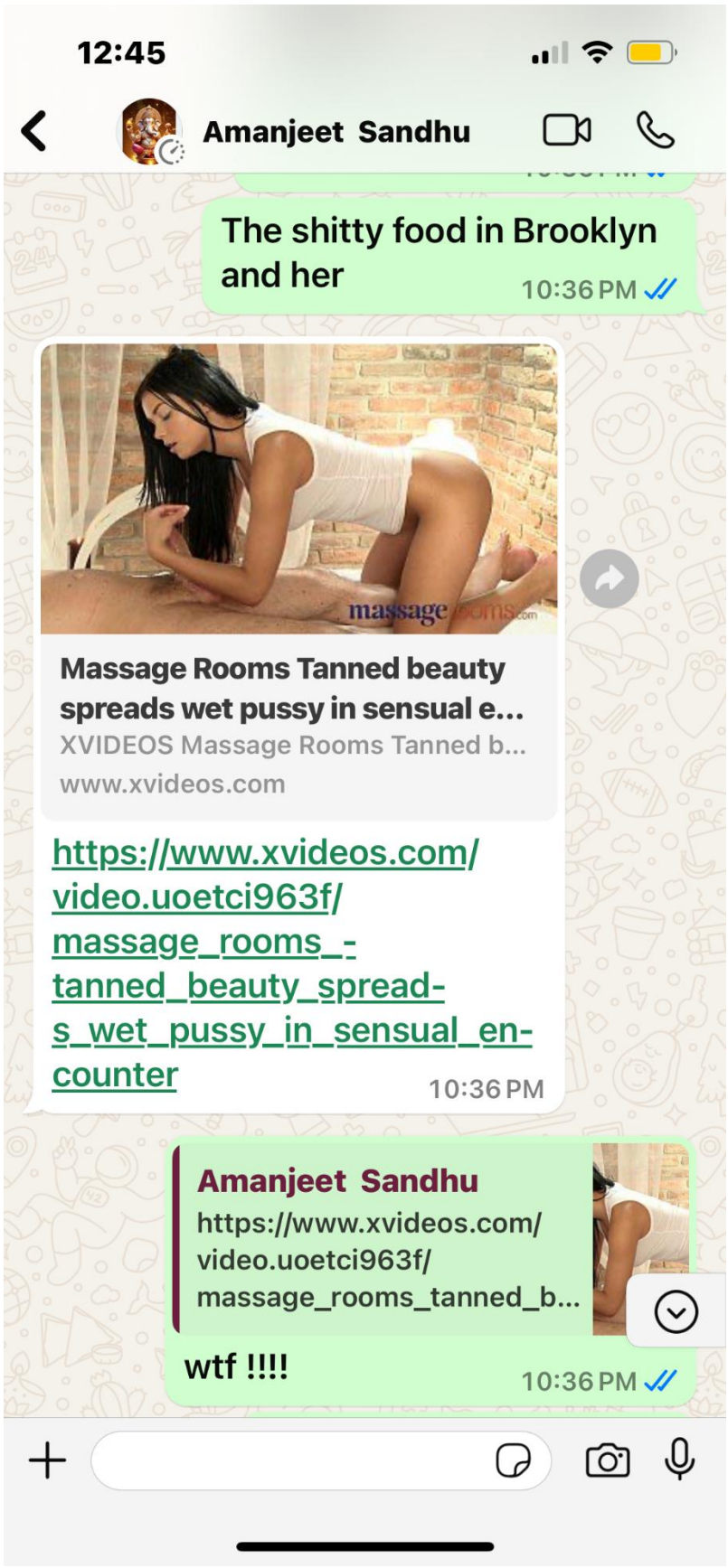
307. In approximately September 2024, while DELACRUZ was assigned to TD32 and experiencing difficulties involving GREENE, she contacted SANDHU through WhatsApp seeking assistance and discussing her workplace circumstances.

308. DELACRUZ explained that she believed she had made a serious mistake by trusting GREENE and discussed her frustration with her assignment and working conditions.

309. The conversation also concerned ordinary matters, including DELACRUZ's dissatisfaction with food available in the area.

310. Rather than addressing DELACRUZ's concerns professionally, SANDHU activated WhatsApp's disappearing-message feature and transmitted a pornographic video depicting a woman in a massage-room setting.


massage rooms.com


12:45
Amanjeet Sandhu
The shitty food in Brooklyn and her
10:36 PM
massage rooms.com
Massage Rooms Tanned beauty spreads wet pussy in sensual e...
XVIDEOS Massage Rooms Tanned b...
www.xvideos.com
https://www.xvideos.com/video.uoetci963f/massage_rooms_-tanned_beauty_spreads_wet_pussy_in_sensual_encounter
10:36 PM
Amanjeet Sandhu
https://www.xvideos.com/video.uoetci963f/massage_rooms_tanned_b...
wtf !!!!
10:36 PM

311. The pornographic video depicted a dark-haired woman positioned over a naked man lying on his back with an erect penis, which she manually stimulated with an up-and-down motion. By transmitting this sexually explicit material to DELACRUZ, SANDHU suggested a sexual scenario in which he was the man receiving stimulation and DELACRUZ was the woman performing the act, further communicating his desire for sexual intimacy with her.

312. DELACRUZ had not requested pornography, discussed an interest in receiving sexually explicit material, or invited SANDHU to introduce sexual content into the conversation.

313. DELACRUZ reacted with shock and disgust, responding in substance, "What the fuck?"

314. SANDHU did not apologize, explain the transmission, or acknowledge that sending pornography to a subordinate officer seeking professional assistance was inappropriate.

315. Instead, he resumed communicating with DELACRUZ as though nothing unusual had occurred, including greeting her the following day.

316. The incident was particularly disturbing because DELACRUZ had approached SANDHU concerning problems at TD32 and believed he might be able to help her obtain a transfer or relief from GREENE's alleged mistreatment.

317. Instead of receiving professional assistance, DELACRUZ was again subjected to unsolicited sexual material by the same executive who had previously expressed his desire to have sex with her.

318. DELACRUZ regarded the transmission as another escalation in SANDHU's sexual harassment and an attempt to determine whether she would tolerate further sexually explicit conduct.

K. Sandhu's Repeated Questions About Masturbation, Sexual Intercourse, and Delacruz's Private Sex Life

320. Following DELACRUZ's transfer to TD32, SANDHU repeatedly initiated telephone conversations concerning her private sexual activities.

321. On one occasion, SANDHU asked DELACRUZ, "Are you cumming today?"

322. DELACRUZ responded that she was not and demanded, "Why are you asking me those questions?"

323. SANDHU continued discussing masturbation, suggesting that DELACRUZ should masturbate and questioning how frequently she engaged in that activity.

324. He stated words to the effect of, "You can't tell me you don't masturbate if you don't have anyone."

325. SANDHU also questioned DELACRUZ about her relationship with her son's father and demanded to know, "Who are you having intercourse with?"

326. On another occasion, SANDHU asked, "I think I should buy you a dildo. How many dildos do you own? Or should I buy you more?"

327. He also questioned how frequently DELACRUZ had sex, how many times she got "fucked," and how often she masturbated.

328. DELACRUZ repeatedly objected, including telling him, "Enough. Stop asking those questions. That's my personal business, and I don't think you should know."

329. SANDHU attempted to justify his questions by suggesting that masturbation could relieve stress, notwithstanding DELACRUZ's objections and the absence of any professional reason to discuss her sexual activities.

330. These were recurring conversations, not an isolated inappropriate question. SANDHU sometimes stopped temporarily after DELACRUZ objected, only to resume similar questions and sexual comments later.

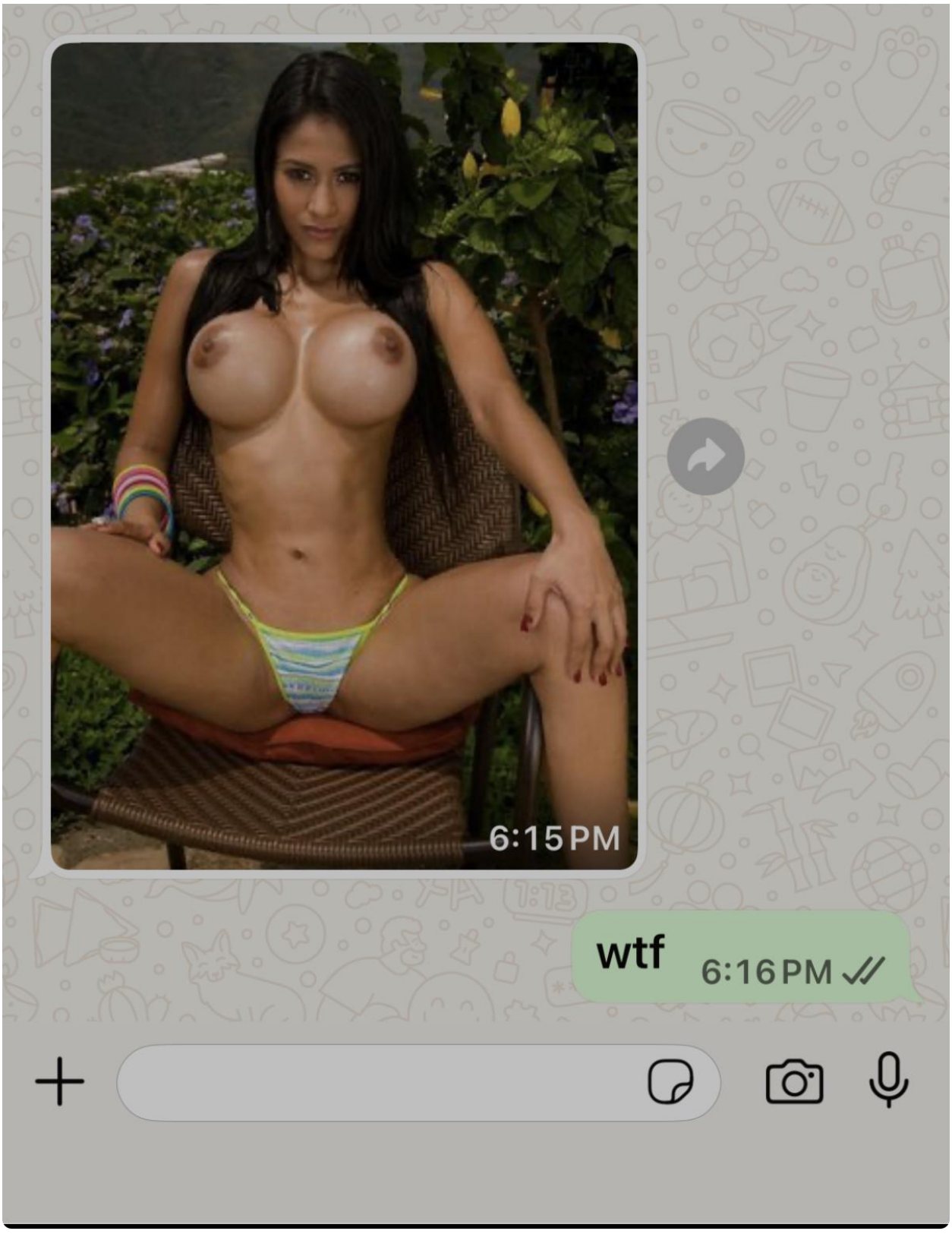
331. DELACRUZ was embarrassed, angry, and distressed that an NYPD executive continued questioning her about masturbation, sex toys, and intercourse when she was seeking assistance with serious workplace problems.

332. DELACRUZ had already experienced male supervisors treating her body and sexual availability as subjects of workplace discussion. SANDHU's persistent questioning reproduced those experiences while exploiting the professional relationship she believed she needed to maintain.

L. Sandhu's Separate Transmission of a Sexually Explicit Photograph in Late 2024

333. In approximately November 2024, about two months after the pornographic-video incident, SANDHU transmitted another sexually explicit image to DELACRUZ.

334. The photograph depicted a woman wearing a thong, with her breasts exposed and her legs open.


6:15 PM
wtf
6:16 PM

335. DELACRUZ had not requested the photograph or invited SANDHU to send her sexually explicit images.

336. DELACRUZ responded, "What the fuck is this?"

337. SANDHU did not provide an explanation or apology and instead remained silent concerning the photograph.

338. The following day, SANDHU resumed communicating with DELACRUZ as though he had done nothing inappropriate.

339. The photograph was a separate incident from the earlier pornographic video and further demonstrated the continuing nature of SANDHU's unwanted sexual communications into late 2024.

340. At the time, DELACRUZ was experiencing difficulties under GREENE at TD32 and believed SANDHU was communicating with GREENE or otherwise possessed influence that might help her obtain relief.

341. DELACRUZ felt trapped between needing the assistance she believed SANDHU could provide and rejecting the unsolicited pornography and sexual questions he continued directing toward her.

342. The situation recalled her earlier experiences of sexual exploitation by employers who appeared supportive before introducing unwanted sexual demands and expectations.

M. The Cumulative Pattern of Sexual Grooming, Harassment, and Professional Dependence

343. From approximately January 2023 through late 2024, SANDHU engaged in a continuing course of conduct that progressively transformed DELACRUZ's professional relationship with her commanding officer into one characterized by unwanted sexual attention, demands for intimacy, sexually explicit communications, and physical advances.

344. SANDHU initially cultivated DELACRUZ's trust by assisting with leave, family responsibilities, assignments, and conflicts involving other supervisors, while increasing the amount of time she spent alone with him in departmental vehicles and behind closed office doors.

345. He then demanded personal familiarity, questioned her loyalty when she resisted, commented repeatedly on her breasts and buttocks, changed his clothes in her presence, attempted to kiss her against her wishes, and declared his love while expressing his desire for a sexual relationship.

346. When DELACRUZ rejected his advances, SANDHU responded with anger, persistent questioning, and continued demands for intimacy, culminating in unwanted physical contact at the December 2023 Christmas party.

347. After DELACRUZ transferred from TD1, SANDHU continued directing sexually explicit questions and communications toward her, including the pornographic video and separate photograph transmitted in 2024.

348. SANDHU's conduct was especially harmful because DELACRUZ had previously experienced sexual coercion and retaliatory termination by male employers who controlled her livelihood.

349. DELACRUZ recognized that a supervisor's apparent generosity or protection could become intertwined with sexual expectations, and she feared that refusing SANDHU would result in the loss of professional assistance or further mistreatment.

350. Her fear was intensified by the hostility and sexual rumors surrounding her at TD1 and the difficulties she subsequently experienced under GREENE at TD32.

351. DELACRUZ did not regard her continued communication with SANDHU, compliance with his assignments, or acceptance of legitimate accommodations as consent to sexual attention or intimacy.

352. She repeatedly rejected his advances, objected to his sexual comments and questions, physically resisted an unwanted kiss, refused his demand to leave the Christmas party with him, and expressed shock when he transmitted pornographic material.

353. The alleged pattern of cultivating trust, increasing private access, establishing professional dependence, testing boundaries, and escalating sexual conduct is consistent with adult sexual grooming, particularly where the person engaging in the conduct possesses supervisory authority over the affected employee.

354. DELACRUZ experienced the cumulative conduct as sexual objectification, humiliation, intimidation, and exploitation of the very professional trust she had placed in her commanding officer.

355. Instead of being respected as a police officer, mother, and educated professional pursuing advancement within the NYPD, DELACRUZ was repeatedly confronted with the sexual desires and expectations of a senior officer whose authority and influence affected her career.

356. SANDHU's conduct contributed substantially to the sexually hostile working conditions, emotional distress, professional isolation, and fear of retaliation alleged in this Verified Complaint.

VI. Police Officer Rosario E. Montero: Sexual Rumors, Locker-Room Intimidation, and Humiliation

A. The Sexual Rumors Concerning Delacruz and Captain Sandhu

357. By July 2024, plaintiff MARIA A. DELACRUZ ("DELACRUZ") had become the subject of persistent rumors within Transit District 1 ("TD1") alleging that she was engaged in a sexual relationship with SANDHU.

358. DELACRUZ had not engaged in a sexual relationship with SANDHU. Her assignment as his driver resulted from decisions made by SANDHU in his capacity as Commanding Officer, rather than any romantic or sexual arrangement.

359. Nevertheless, certain members of TD1 increasingly characterized DELACRUZ's assignments and professional treatment as benefits she received because she was supposedly having sex with SANDHU.

360. DELACRUZ became aware that female officers were discussing her alleged relationship with SANDHU and bringing complaints and accusations concerning her to supervisory personnel, including Deputy Chief STEVEN M. MAURIELLO ("MAURIELLO").

361. These rumors subjected DELACRUZ to humiliation and undermined her professional standing by suggesting that her employment opportunities depended upon sexual intimacy with a superior officer rather than her qualifications and performance.

B. July 17, 2024: Montero's Aggressive Confrontation While Delacruz Was Undressed

362. On July 17, 2024, after returning from vacation, DELACRUZ entered the women's locker room at TD1 while preparing to complete a dates form and attend to her work responsibilities.

363. DELACRUZ turned on the locker-room light, whereupon defendant Police Officer ROSARIO E. MONTERO ("MONTERO") approached her angrily and began yelling.

364. MONTERO confronted DELACRUZ with the accusation, "You think you could do whatever the fuck you want because you're fucking the captain?"

365. The accusation expressly connected DELACRUZ's perceived workplace treatment and authority to the allegation that she was having sexual intercourse with SANDHU.

366. As MONTERO continued confronting her, DELACRUZ was changing her clothes. She removed her pants and shirt and was wearing only her bra and panties.

367. Despite DELACRUZ being partially undressed, MONTERO continued advancing toward her, yelling and moving directly into her face in a manner DELACRUZ perceived as an imminent physical confrontation.

368. DELACRUZ felt exposed and vulnerable because she was confronted aggressively in a private changing area while wearing only her underwear.

369. DELACRUZ believed MONTERO intended to fight her and feared that the confrontation would escalate into physical violence.

370. DELACRUZ responded, "Get the fuck away from my face."

371. Rather than engage in a physical altercation, DELACRUZ hurriedly pulled up her pants, grabbed her sweatshirt, and left the locker room to seek supervisory assistance.

372. MONTERO's conduct transformed the sexual rumors surrounding DELACRUZ into a direct confrontation involving intimidation, humiliation, and the threat of physical violence in an area where DELACRUZ was entitled to change her clothing without interference.

C. Delacruz's Immediate Report and the Failure to Address Her Complaint

373. Immediately after leaving the locker room, DELACRUZ went to the TD1 desk, where Lieutenant Steven Rosado was assigned.

374. DELACRUZ reported MONTERO's conduct and requested assistance, explaining that MONTERO had aggressively confronted her while she was changing and that she believed MONTERO was attempting to fight her.

375. DELACRUZ wanted MONTERO kept away from her and expected supervisory personnel to address the confrontation.

376. Instead, DELACRUZ perceived that her complaint was dismissed and that no meaningful immediate action was taken to protect her or address MONTERO's conduct.

377. DELACRUZ was particularly upset because she had been confronted over an alleged sexual relationship that she maintained did not exist, yet her efforts to obtain assistance appeared to receive less attention than the rumors themselves.

378. The incident left DELACRUZ feeling humiliated, frightened, and unsupported within her command.

379. DELACRUZ believed that the persistent sexual rumors had created an environment in which MONTERO felt sufficiently emboldened to confront and intimidate her while she was partially undressed.

380. The confrontation demonstrated that the speculation concerning DELACRUZ and SANDHU was no longer confined to workplace gossip but had directly affected DELACRUZ's personal safety, dignity, and ability to perform her duties without harassment.

381. By the end of July 17, 2024, DELACRUZ determined that she needed to complain directly to MAURIELLO because she believed the incident had not been appropriately addressed through the ordinary supervisory chain.

382. MONTERO's conduct contributed to the sexually hostile working environment at TD1 and reinforced DELACRUZ's belief that she could no longer safely or comfortably continue working in that command.

D. The NYPD's Mischaracterization of Montero's Conduct and Closure of Internal Affairs Investigation No. 2024-21122

383. On July 17, 2024, Captain Darrien C. King, Executive Officer of TD1, prepared an official report addressed to the Chief of the Internal Affairs Bureau concerning the confrontation between DELACRUZ and defendant ROSARIO E. MONTERO ("MONTERO").

384. The report was prepared under Administrative Guide §§ 318-11 and 304-10 and assigned Internal Affairs Bureau Log No. 2024-21122.

385. Rather than accurately documenting DELACRUZ's allegations concerning sexual rumors, intimidation, and humiliation while partially undressed, King characterized the incident as a "VERBAL DISPUTE BETWEEN TWO UMOS WHILE INSIDE A DEPARTMENT FACILITY."

386. King reported that the incident occurred at approximately 7:00 a.m. inside the women's locker room at TD1 and that no injuries had been alleged or reported.

387. According to the report, Lieutenant Steven Rosado learned of the confrontation at approximately 7:00 a.m. after DELACRUZ reported MONTERO's conduct and requested that MONTERO be removed from the locker room.

388. Rosado directed then-Sergeant Johanny Jacquez to mediate the confrontation. Both officers subsequently continued their assigned duties.

389. King reported that he first learned of the incident at approximately 3:00 p.m., conducted an investigation, and arranged administrative guide hearings.

390. The report characterized the confrontation as a disagreement concerning the lighting inside the women's locker room.

391. That characterization omitted DELACRUZ's allegation that MONTERO had aggressively confronted her while she was changing clothes and accused her of receiving preferential treatment because she was "fucking the captain."

392. The omission was material because MONTERO's alleged accusation directly implicated the sexual rumors concerning SANDHU, which DELACRUZ maintained were false and which had contributed to her humiliation and deteriorating working conditions.

393. The report nevertheless acknowledged that DELACRUZ told investigators MONTERO had approached closely and stated, "This is why no one likes you, you B."

394. The report further acknowledged that DELACRUZ told investigators she felt threatened by MONTERO, notwithstanding the absence of a physical altercation.

395. MONTERO reportedly confirmed that she had confronted DELACRUZ and made substantially the same derogatory statement, while maintaining that nothing further occurred.

396. Thus, even the Department's account established that MONTERO had directed a personally insulting statement toward DELACRUZ during a workplace confrontation.

397. The investigation nevertheless reduced the incident to a verbal disagreement about lighting, without addressing the sexual accusation that DELACRUZ identified as central to the confrontation.

398. The administrative hearings included MAURIELLO, then-Deputy Inspector William A. Haut, SANDHU, King, Lieutenant Michael Hoey, and Sergeant Nicholas Mauceli.

399. Following the hearings, King reported that there were no allegations of assault or other misconduct and determined that no further investigation was necessary.

400. King expressly directed that Internal Affairs Investigation No. 2024-21122 be closed.

401. That determination failed to meaningfully address DELACRUZ's allegation that MONTERO's conduct was motivated by sexually degrading rumors about her relationship with her commanding officer, rather than merely a disagreement about locker-room lighting.

402. The report further acknowledged that DELACRUZ verbally requested a transfer to another transit district following the incident.

403. On July 18, 2024, DELACRUZ submitted a written request for transfer from TD1 to Transit District 12, citing career enhancement opportunities and commuting hardship.

404. SANDHU endorsed the transfer request the same day, concurring in DELACRUZ's proposed reassignment.

405. Although the written transfer request cited professional advancement and commuting considerations, DELACRUZ also sought to escape the sexually hostile atmosphere, persistent rumors, and intimidation she had experienced at TD1.

406. DELACRUZ ultimately transferred to Transit District 32, where she anticipated obtaining relief from the working conditions that had prompted her departure from TD1.

407. The Department's characterization and closure of the July 17, 2024 incident left the sexual allegations underlying MONTERO's confrontation unaddressed, contributing to DELACRUZ's belief that her complaints were being minimized rather than meaningfully investigated.

E. July 26, 2024: The Bible, Salt, Black Tape, and Adultery-Related Materials Placed on Delacruz's Locker

408. On July 26, 2024, nine days after MONTERO's aggressive confrontation with DELACRUZ in the women's locker room at TD1, DELACRUZ discovered a Bible placed on top of her locker.

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Signorelli's depiction of the antichrist as jesus' demonic twin

The word "antichrist" appears in just three passages in the Bible (in the New Testament letters known as 1 John and 2 John); it does not appear at all in the Book of Revelation. Nevertheless, the idea of an Antichrist is central to the apocalyptic world view that sees human history as a struggle between God and Satan for the fate of mankind.

According to most Christian prophesies of the End Time, the Antichrist will act as Satan's chief agent on earth during this period. The Antichrist -- a sort of evil twin of Jesus in many ways -- will forge a one-world government through promises of peace. But when Jesus returns, he will expose the Antichrist as an impostor, defeat him in the battle of Armageddon, and reign with the Christian martyrs for a thousand years on earth.

Robert Fuller, in his book Naming the Antichrist, notes that modern apocalypticists believe the Book of Revelation "contains much information about the Antichrist--who will emerge as a 'beast from the sea' to be Satan's ally in a last, desperate assault on Christ and his church." This "parody and mirror opposite of Christ" will be identifiable in a number of ways:

· Promising peace to those who follow him, he will rise to a position of great power.

· With the help of his own false prophet, the Antichrist will gain control of the world economy, by forcing each person "to be marked on the right hand or the forehead, so that no one can buy or sell unless he has the mark, that is, the name of the beast or the number of its name . . . six hundred and sixty-six"

· One of the heads of the beast also "seemed to have a mortal wound, but its mortal wound was healed, and the whole earth followed the beast with wonder."

· THE QUIZ

For nearly 2000 years, believers have spent considerable energy trying to identify potential Antichrists in their midst using scripture, particularly Revelation, as their guide.

Using the Antichrist characteristics described above, test your knowledge. In the following list, who have been labeled as an arch-deceiver and false messiah of the Last Days?

Don Francisco	☐	Nero Caesar	☐
Yasser Arafat	☐	Regis Philbin	☐
"The Beast"	☐	Pope John Paul II	☐
Jimmy Carter	☐	Bob Dylan	☐
Bill Gates	☐	Ronald Reagan	☐
Billy Graham	☐	Pat Robertson	☐

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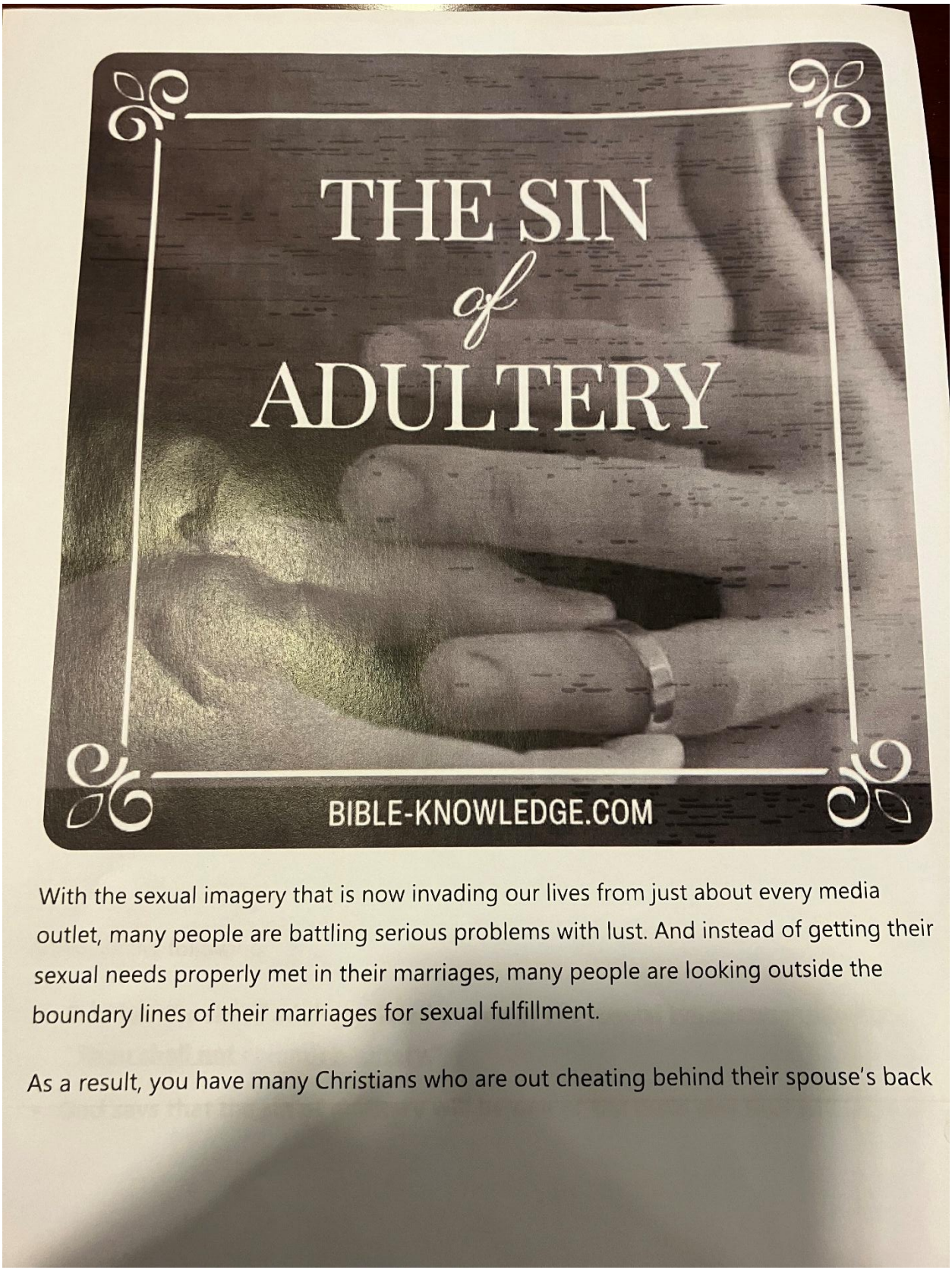
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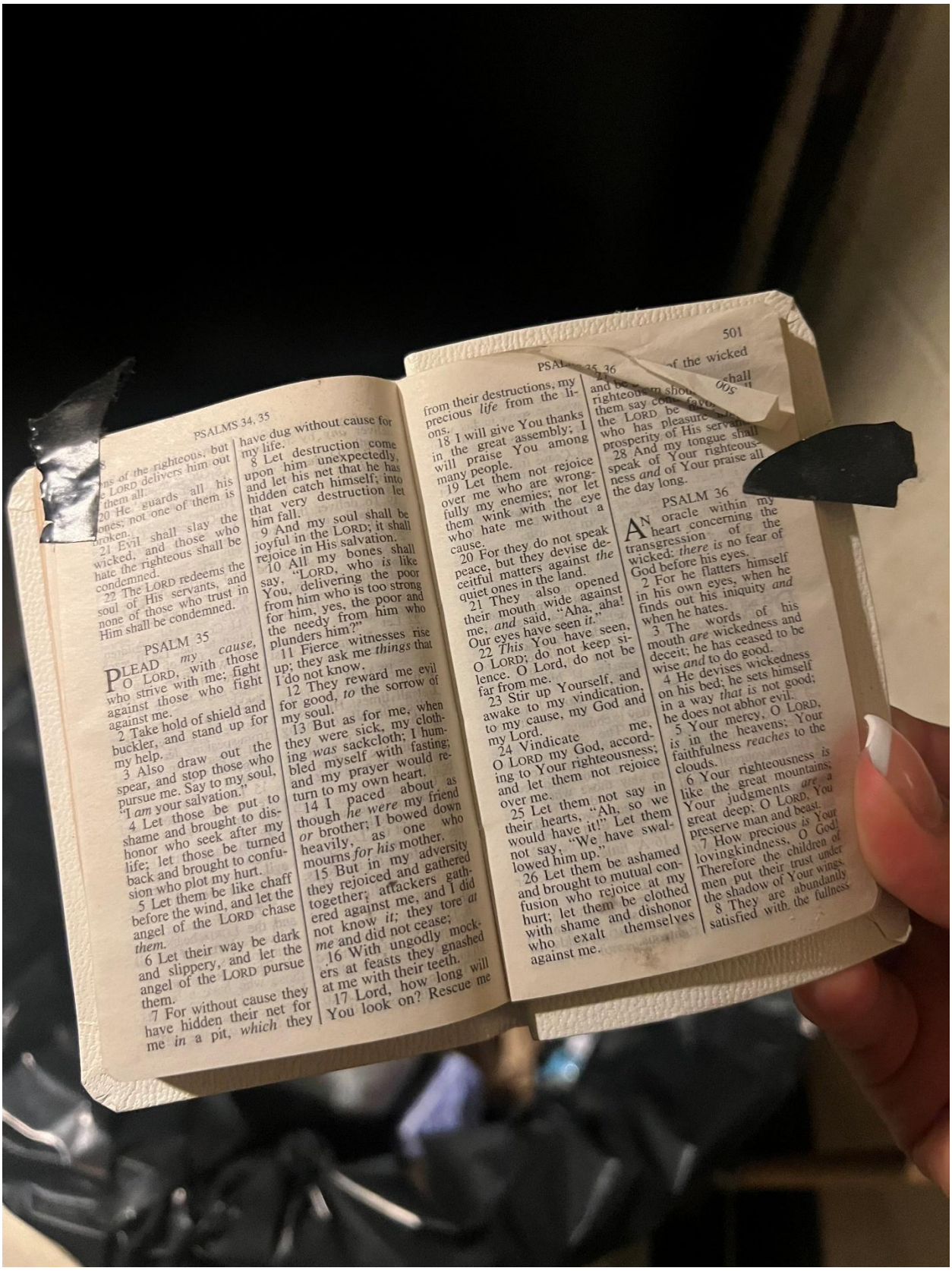

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With the sexual imagery that is now invading our lives from just about every media outlet, many people are battling serious problems with lust. And instead of getting their sexual needs properly met in their marriages, many people are looking outside the boundary lines of their marriages for sexual fulfillment.

As a result, you have many Christians who are out cheating behind their spouse's back




PSALMS 34, 35
have dug without cause for
my life.
8 Let destruction come
upon him unexpectedly,
and let his net that he has
hidden catch himself; into
that very destruction let
him fall.
9 And my soul shall be
joyful in the LORD; it shall
rejoice in His salvation.
10 All my bones shall
say, "LORD, who is like
You, delivering the poor
from him who is too strong
for him, yes, the poor and
the needy from him who
plunders him?"
11 Fierce witnesses rise
up; they ask me things that
I do not know.
12 They reward me evil
for good, to the sorrow of
my soul.
13 But as for me, when
they were sick, my cloth-
ing was sackcloth; I hum-
bled myself with fasting;
and my prayer would re-
turn to my own heart.
14 I paced about as
though he were my friend
or brother; I bowed down
heavily, as one who
mourns for his mother.
15 But in my adversity
they rejoiced and gathered
together; attackers gath-
ered against me, and I did
not know it; they tore at
me and did not cease;
16 With ungodly mock-
ers at feasts they gnashed
at me with their teeth.
17 Lord, how long will
You look on? Rescue me
from their destructions, my
precious life from the li-
ons.
18 I will give You thanks
in the great assembly; I
will praise You among
many people.
19 Let them not rejoice
over me who are wrong-
fully my enemies; nor let
them wink with the eye
who hate me without a
cause.
20 For they do not speak
peace, but they devise de-
ceitful matters against the
quiet ones in the land.
21 They also opened
their mouth wide against
me, and said, "Aha, aha!
Our eyes have seen it."
22 This You have seen,
O LORD; do not keep si-
lence. O Lord, do not be
far from me.
23 Stir up Yourself, and
awake to my vindication,
to my cause, my God and
my Lord.
24 Vindicate me,
O LORD my God, accord-
ing to Your righteousness;
and let them not rejoice
over me.
25 Let them not say in
their hearts, "Ah, so we
would have it!" Let them
not say, "We have swal-
lowed him up."
26 Let them be ashamed
and brought to mutual con-
fusion who rejoice at my
hurt; let them be clothed
with shame and dishonor
who exalt themselves
against me.
501
of the wicked
shall
PSALM 36
AN oracle within my
heart concerning my
transgression of the
wicked: there is no fear of
God before his eyes.
2 For he flatters himself
in his own eyes, when he
finds out his iniquity and
when he hates.
3 The words of his
mouth are wickedness and
deceit; he has ceased to be
wise and to do good.
4 He devises wickedness
on his bed; he sets himself
in a way that is not good;
he does not abhor evil.
5 Your mercy, O LORD,
is in the heavens; Your
faithfulness reaches to the
clouds.
6 Your righteousness is
like the great mountains;
Your judgments are a
great deep; O LORD, You
preserve man and beast.
7 How precious is Your
lovingkindness, O God!
Therefore the children of
men put their trust under
the shadow of Your wings.
8 They are abundantly
satisfied with the fullness
PSALMS 34, 35
ns of the righteous, but
e LORD delivers him out
them all.
20 He guards all his
ones; not one of them is
roken.
21 Evil shall slay the
wicked; and those who
hate the righteous shall be
condemned.
22 The LORD redeems the
soul of His servants, and
none of those who trust in
Him shall be condemned.
PSALM 35
PLEAD my cause,
O LORD, with those
who strive with me; fight
against those who fight
against me.
2 Take hold of shield and
buckler, and stand up for
my help.
3 Also draw out the
spear, and stop those who
pursue me. Say to my soul,
"I am your salvation."
4 Let those be put to
shame and brought to dis-
honor who seek after my
life; let those be turned
back and brought to confu-
sion who plot my hurt.
5 Let them be like chaff
before the wind, and let the
angel of the LORD chase
them.
6 Let their way be dark
and slippery, and let the
angel of the LORD pursue
them.
7 For without cause they
have hidden their net for
me in a pit, which they

409. The Bible was opened to Psalms 34 and 35 and was accompanied by salt, black tape, and material referring to adultery.

410. DELACRUZ had not placed these items on her locker and did not know who was responsible for their placement.

411. The discovery was particularly disturbing because DELACRUZ had already been subjected to persistent accusations that she was having a sexual relationship with SANDHU, a married commanding officer.

412. Just nine days earlier, MONTERO had confronted DELACRUZ inside the same locker room, accusing her of believing she could do whatever she wanted because she was "fucking the captain."

413. DELACRUZ understood the placement of the Bible and adultery-related materials as another humiliating reference to the accusations concerning her relationship with SANDHU.

414. The combination of religious passages, salt, black tape, and references to adultery caused DELACRUZ to feel singled out, intimidated, and increasingly unsafe within an area designated for female officers to change and secure their personal belongings.

415. DELACRUZ reported the discovery to SANDHU, then Commanding Officer of TD1, expecting that the placement of these materials would be investigated in light of the earlier confrontation and continuing sexual rumors.

416. DELACRUZ did not observe any meaningful corrective action following her report to SANDHU.

417. The discovery reinforced DELACRUZ's belief that the sexually hostile conditions at TD1 had not been resolved by the administrative hearings and closure of Internal Affairs Bureau Log No. 2024-21122.

418. Although DELACRUZ could not identify the person responsible for placing the materials on her locker, the incident contributed to her fear, humiliation, and determination to leave TD1.

419. The July 26, 2024 incident further demonstrated the continuing consequences of the sexual rumors surrounding DELACRUZ and SANDHU and the failure of supervisory personnel to restore a working environment in which DELACRUZ could perform her duties without intimidation or sexually degrading insinuations.

VII. Deputy Chief Steven M. Mauriello: Sexual Rumors, Supervisory Misconduct, and the Mishandling of Delacruz's Complaints

A. Mauriello's Supervisory Authority and the Circulation of Sexual Rumors

420. At all relevant times, defendant STEVEN M. MAURIELLO ("MAURIELLO"), then an Inspector and Commanding Officer of Transit Borough Manhattan, exercised supervisory and command authority over Transit District 1 ("TD1"), including its commanding officers and subordinate personnel.

421. By July 2024, plaintiff MARIA A. DELACRUZ ("DELACRUZ") had become the subject of persistent workplace rumors alleging that she was engaged in a sexual relationship with then-Captain AMANJEET S. SANDHU ("SANDHU"), the Commanding Officer of TD1.

422. DELACRUZ maintained that she was not engaged in a sexual relationship with SANDHU and that her assignment as his driver was an official departmental assignment rather than the product of sexual intimacy.

423. DELACRUZ became aware that female officers were approaching MAURIELLO and discussing their suspicions concerning her relationship with SANDHU.

424. DELACRUZ believed that MAURIELLO was entertaining these accusations and permitting speculation about her sexual relationship with a commanding officer to influence how she was perceived and treated within TD1.

425. Instead of being recognized for her professional responsibilities and performance, DELACRUZ increasingly felt that her reputation had become defined by allegations that she was receiving favorable treatment because she was sleeping with SANDHU.

B. July 17, 2024: Mauriello's Admission Concerning the Sexual Rumors

426. On July 17, 2024, following the confrontation in which Police Officer ROSARIO E. MONTERO ("MONTERO") accused DELACRUZ of "fucking the captain" while she was changing clothes in the women's locker room, DELACRUZ sought MAURIELLO's intervention.

427. DELACRUZ approached MAURIELLO's office, knocked on his door, and asked, "Can I please speak to you for a second?"

428. MAURIELLO responded, "Speak."

429. DELACRUZ confronted MAURIELLO directly, asking, "Okay, why are you going around saying that I'm sleeping with Sandhu?"

430. MAURIELLO responded, "I'm not the only one saying that. Everyone here thinks that."

431. MAURIELLO's response confirmed to DELACRUZ that the accusations concerning her alleged sexual relationship with SANDHU were circulating among personnel beyond the officers who had confronted or disparaged her.

432. Rather than deny participating in the discussions, MAURIELLO invoked the supposed beliefs of other personnel, reinforcing the sexual allegations that had already subjected DELACRUZ to humiliation and intimidation.

433. DELACRUZ explained that the rumors had escalated beyond ordinary workplace gossip and that MONTERO had aggressively confronted her while she was partially undressed, approaching her face in a manner that made her fear a physical altercation.

434. MAURIELLO responded, "Oh, and what do you want me to do?"

435. DELACRUZ was stunned by his response and replied, "Are you kidding me? After everything that you have said, and this is what you're trying to do?"

436. DELACRUZ perceived MAURIELLO's response as dismissive of both the sexual rumors and the intimidation she had experienced that morning.

437. MAURIELLO's statements were particularly consequential because he was not an ordinary coworker expressing a personal opinion. He was the borough commanding officer responsible for supervising the command in which the hostility had developed.

C. Delacruz's Complaint Against Mauriello and the Immediate Administrative Response

438. Following her conversation with MAURIELLO, DELACRUZ reported to SANDHU that she felt threatened and unsupported because of MAURIELLO's handling of the incident.

439. DELACRUZ explained that she believed MAURIELLO was defending MONTERO rather than addressing the aggressive confrontation and the sexually degrading allegations that had precipitated it.

440. DELACRUZ was subsequently taken to SANDHU's office, where Police Benevolent Association Delegate Police Officer Michael A. McPhee also became involved.

441. At that point, DELACRUZ was informed that a General Order ("GO") report needed to be prepared immediately because she had alleged that MAURIELLO was targeting her.

442. DELACRUZ was disturbed by the sequence of events. She had reported MONTERO's confrontation at approximately 7:00 a.m., yet she did not perceive a comparable immediate investigative response until she complained about MAURIELLO later that day.

443. DELACRUZ believed that the administrative focus had shifted from the sexually hostile circumstances surrounding MONTERO's conduct to documenting her allegations against the borough commanding officer.

444. During the ensuing discussions, DELACRUZ recalled being told that she should be transferred to Transit District 12 ("TD12") and that the command should get rid of the problem.

445. DELACRUZ objected, asking, "What do you think, I'm a problem?"

446. The statement was deeply troubling to DELACRUZ because she had sought assistance after being intimidated and humiliated, yet she perceived that the proposed solution was to remove her from the command rather than address the conduct she had reported.

D. Mauriello's Offer to Arrange a Transfer if Delacruz Restricted Her Complaint

447. Before the GO report was prepared, MAURIELLO approached DELACRUZ and stated words to the effect of, "Hey, listen, if you just keep it to what happened in the locker room, I will make sure that you get transferred to wherever you want to go."

448. DELACRUZ understood MAURIELLO's statement as an offer to use his supervisory authority to facilitate her transfer if she confined her complaint to the locker-room confrontation rather than pursue the broader allegations involving him.

449. The distinction was significant because DELACRUZ had specifically confronted MAURIELLO about his participation in the sexual rumors and his dismissive treatment of her complaint.

450. MAURIELLO's proposed limitation would have separated MONTERO's conduct from the sexual allegations and supervisory behavior that DELACRUZ believed had contributed to the confrontation.

451. DELACRUZ felt vulnerable and emotionally overwhelmed. She feared continuing to work under the authority of a senior officer whom she believed had participated in disparaging her and had dismissed her concerns.

452. Consequently, DELACRUZ agreed to pursue a transfer because she wanted to escape the environment at TD1, not because she considered the underlying misconduct resolved.

453. DELACRUZ believed that she had effectively been placed in a position of choosing between preserving the full scope of her complaint and obtaining the reassignment she needed to feel safe.

E. Mauriello's Intimidating Supervisory Conduct and Delacruz's Fear of Retaliation

454. DELACRUZ's concerns regarding MAURIELLO were not limited to the July 17, 2024 conversation.

455. During her assignment at TD1, DELACRUZ experienced MAURIELLO as an intimidating supervisor who yelled and screamed at her and whose conduct made her apprehensive about challenging his authority.

456. DELACRUZ also believed that MAURIELLO repeatedly threatened her with disciplinary consequences, including suspension, contributing to her fear that further complaints would jeopardize her employment.

457. These experiences were especially consequential because DELACRUZ was already dealing with sexually degrading allegations concerning SANDHU and feared that exercising her rights would result in additional workplace hostility.

458. MAURIELLO's position as borough commanding officer amplified DELACRUZ's concerns because his supervisory authority extended beyond TD1 and could influence her assignments, transfer opportunities, and professional standing.

459. DELACRUZ believed that challenging MAURIELLO could expose her to further retaliation within the Department's supervisory hierarchy.

F. The July 18, 2024 Transfer Request and Delacruz's Eventual Reassignment

460. On July 18, 2024, DELACRUZ submitted a written request to transfer from TD1 to TD12, citing career enhancement opportunities and commuting hardship.

461. SANDHU endorsed the request, concurring in the proposed transfer.

462. Although the written request identified career and commuting considerations, DELACRUZ also sought reassignment because she wanted to escape the sexual rumors, intimidation, and supervisory treatment she had experienced at TD1.

463. DELACRUZ became concerned when she reviewed the transfer paperwork because it did not identify the safety and workplace-hostility concerns that had motivated her desire to leave.

464. DELACRUZ ultimately accepted an opportunity to transfer to Transit District 32 ("TD32") after then-Captain TAMECCA GREENE ("GREENE") represented that she would protect DELACRUZ from further mistreatment.

465. On or about July 28, 2024, DELACRUZ was informed that an internal telephone transfer had been arranged and that she would report to TD32 rather than return to TD1.

466. DELACRUZ accepted the transfer because she believed she could no longer remain comfortably or safely at TD1 following the sexual rumors, MONTERO's confrontation, and MAURIELLO's response to her complaints.

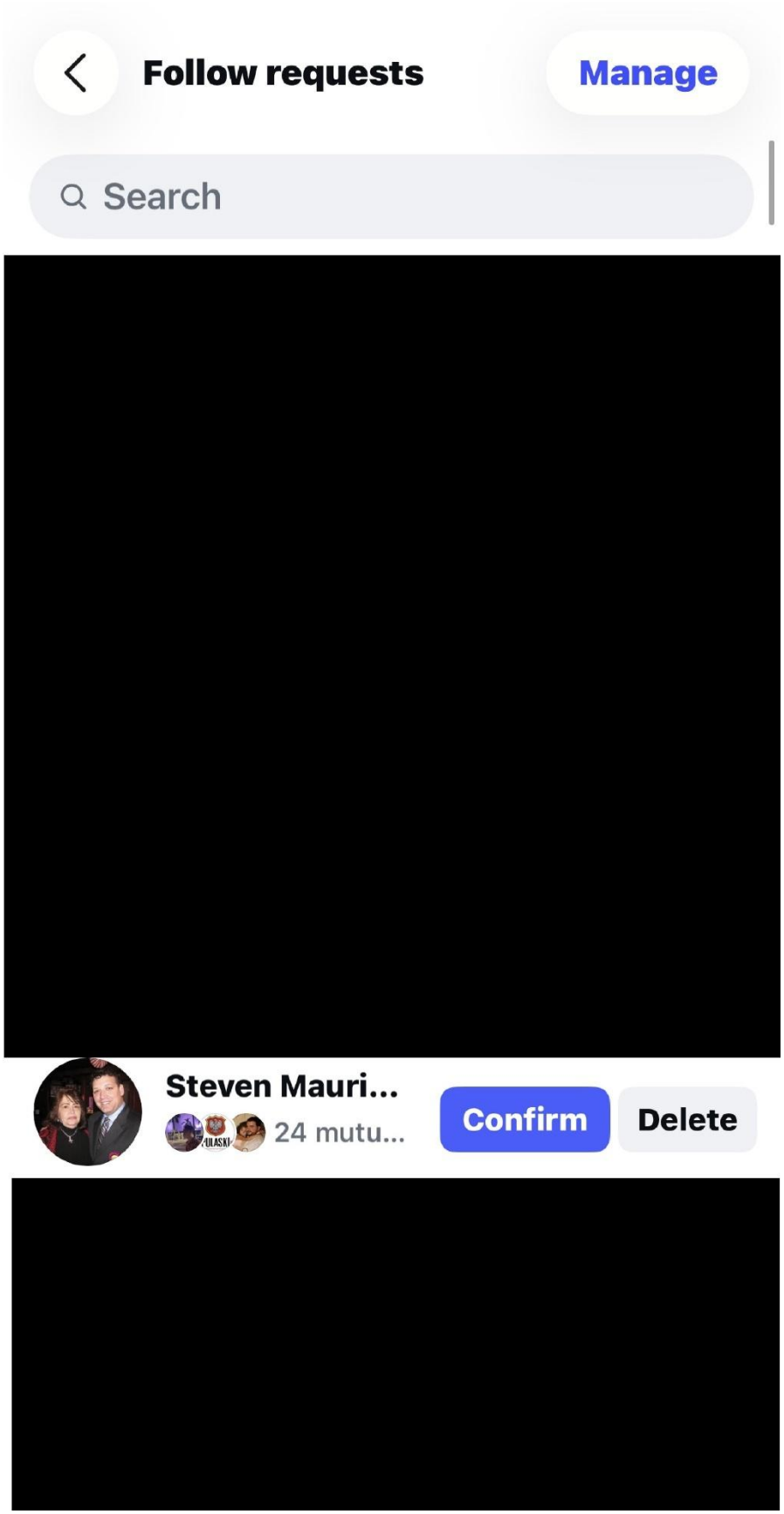
467. The transfer did not resolve the underlying allegations concerning MAURIELLO's participation in the sexual rumors, his handling of DELACRUZ's complaint, or his attempt to limit the subject matter of her allegations in connection with obtaining a reassignment.

468. Instead, DELACRUZ left TD1 believing that her complaints had been minimized and that she, rather than the supervisory personnel responsible for addressing the sexually hostile conditions, had borne the consequences of the misconduct.

469. MAURIELLO's conduct contributed to DELACRUZ's humiliation, emotional distress, fear of retaliation, loss of confidence in the Department's internal complaint procedures, and eventual departure from TD1.

G. Mauriello's Instagram Friend Request Following Delacruz's Transfer to TD32

470. Following DELACRUZ's July 2024 transfer from TD1 to Transit District 32 ("TD32"), MAURIELLO sent DELACRUZ a friend request through Instagram, seeking to establish a personal social-media connection with her.


Follow requests
Manage
Search
Steven Mauri...
24 mutu...
Confirm
Delete

471. MAURIELLO's request occurred after DELACRUZ had confronted him about his participation in workplace rumors alleging that she was having a sexual relationship with SANDHU, complained about his response to MONTERO's conduct, and left TD1 following the July 17, 2024 incident.

472. The unsolicited social-media contact concerned DELACRUZ because it came from the same senior commanding officer whose conduct she had challenged and whose involvement in the administrative proceedings contributed to her decision to leave TD1.

473. The Instagram request further demonstrated that MAURIELLO continued seeking personal contact with DELACRUZ after her departure from his command, notwithstanding the circumstances surrounding her complaint and transfer.

VIII. Deputy Inspector Tamecca Greene: Exploitation of Delacruz, Protection of Sandhu and Mauriello, Retaliatory Employment Practices, and Abuse of Supervisory Authority

A. Greene's Knowledge of the Sexual Harassment and Her Promise to Protect Delacruz

474. At all relevant times, defendant TAMECCA GREENE ("GREENE"), then a Captain and Commanding Officer of Transit District 32 ("TD32"), possessed supervisory authority over plaintiff MARIA A. DELACRUZ ("DELACRUZ"), including authority concerning her assignments, tours of duty, evaluations, disciplinary matters, and working conditions.

475. GREENE previously served in a task-force assignment associated with Transit District 1 ("TD1"), where defendant SANDHU exercised supervisory authority as the commanding officer.

476. During that assignment, GREENE became acquainted with DELACRUZ, who was serving as SANDHU's driver and assistant.

477. GREENE was familiar with DELACRUZ's close working relationship with SANDHU and was aware of the circumstances that eventually led DELACRUZ to seek reassignment from TD1.

478. Those circumstances included workplace rumors alleging that DELACRUZ was having a sexual relationship with SANDHU, the sexually degrading confrontation initiated by defendant MONTERO, and DELACRUZ's complaints concerning defendant MAURIELLO.

479. By July 2024, DELACRUZ had become emotionally exhausted by the treatment she experienced at TD1 and wanted to leave the command.

480. SANDHU encouraged DELACRUZ to accept a transfer and told her, "Just go with it. Take the transfer. I'm going to speak to Tamika."

481. Thereafter, SANDHU communicated with GREENE concerning DELACRUZ's transfer to TD32.

482. GREENE welcomed the arrangement, referring to DELACRUZ as "our baby girl" and promising to protect her from additional mistreatment.

483. GREENE stated words to the effect of, "Absolutely, come over here. I'm going to take care of our baby girl. That's our baby girl. I love her. She'll be good over here. I'll make sure I take care of her, and I'll make sure that nobody bothers her."

484. GREENE knew that DELACRUZ was seeking refuge from a working environment in which she had been subjected to sexual rumors, intimidation, and hostility involving senior supervisory personnel.

485. DELACRUZ relied upon GREENE's representations because she believed GREENE would provide the protection and professional support, she had not received at TD1.

486. DELACRUZ also believed that GREENE and SANDHU were arranging the transfer as a means of separating her from the circumstances involving MAURIELLO.

487. On or about July 28, 2024, DELACRUZ was informed that an internal telephone transfer to TD32 had been arranged.

488. DELACRUZ accepted the assignment believing that GREENE would provide a fresh start and protect her from the sexually hostile conditions she had experienced at TD1.

B. July 29, 2024: Greene's Immediate Exercise of Personal Control Over Delacruz

489. On July 29, 2024, GREENE instructed DELACRUZ to report to TD32, scan her departmental identification, obtain GREENE's departmental vehicle, and travel to GREENE's residence on Long Island to retrieve her.

490. DELACRUZ complied, obtained the vehicle, and drove to GREENE's residence.

491. Upon arriving, DELACRUZ waited approximately three hours outside GREENE's residence before GREENE entered the vehicle.

492. DELACRUZ understood that GREENE had sustained a broken foot but was nevertheless required to remain outside for several hours awaiting GREENE's appearance.

493. When GREENE entered the vehicle, she immediately addressed the circumstances surrounding DELACRUZ's departure from TD1.

494. GREENE stated, "I do not want to hear anything about what happened in TD1. This is a fresh start for you. You hear me?"

495. GREENE thereby made clear that she did not want DELACRUZ discussing the events involving SANDHU, MAURIELLO, MONTERO, or the circumstances that had caused DELACRUZ to leave TD1.

496. GREENE further informed DELACRUZ that she had already spoken to the supervisors, sergeants, and lieutenants assigned to TD32.

497. GREENE stated that she had instructed those supervisors not to approach, question, or interfere with DELACRUZ.

498. GREENE directed DELACRUZ to take orders exclusively from GREENE rather than from other supervisory personnel.

499. GREENE also informed DELACRUZ that she would serve as GREENE's driver and criminal analysis officer.

500. DELACRUZ initially understood these instructions as an effort to prevent additional harassment.

501. However, GREENE's directives also isolated DELACRUZ from ordinary supervisory relationships and concentrated control over her assignments and working conditions in GREENE.

502. DELACRUZ was consequently placed in a position in which the senior officer who had promised protection also controlled her access to other supervisors and her ability to obtain assistance through the normal chain of command.

C. August 2024: Greene's Personal Errands, Supervisory Responsibilities, and Use of Delacruz's Labor

503. During August 2024, GREENE began directing DELACRUZ to perform personal errands and administrative tasks on GREENE's behalf.

504. These assignments extended beyond DELACRUZ's anticipated responsibilities as a criminal analysis officer.

505. GREENE directed DELACRUZ to purchase coffee, clean GREENE's office, clean the roll-call area, and obtain materials for improvements to the roll-call room.

506. DELACRUZ was also directed to purchase coffee for a meeting concerning her employment circumstances.

507. DELACRUZ used personal funds to purchase certain items associated with these assignments.

508. DELACRUZ was not reimbursed for certain expenditures, including materials purchased for command-related purposes.

509. GREENE also began directing DELACRUZ to perform responsibilities associated with GREENE's own supervisory position.

510. On August 24, 2024, GREENE ordered DELACRUZ to attend a mandatory meeting at the 73rd Precinct on GREENE's behalf.

511. GREENE directed DELACRUZ to cover the meeting, take notes, and provide the information to GREENE.

512. Rather than attend the meeting herself, GREENE remained seated in her office while DELACRUZ fulfilled the attendance and note-taking responsibilities GREENE had assigned to her.

513. DELACRUZ attended the meeting pursuant to GREENE's instructions because GREENE was her commanding officer and exercised authority over her employment.

514. GREENE's use of DELACRUZ to cover a mandatory supervisory meeting placed a subordinate police officer in the position of performing an obligation assigned to the commanding officer.

515. DELACRUZ also continued performing driving and other assistance-related duties for GREENE.

516. The combination of personal errands, cleaning assignments, purchases using personal funds, transportation duties, and attendance at supervisory meetings caused DELACRUZ to believe that GREENE was taking advantage of her willingness to comply with orders.

517. DELACRUZ was particularly vulnerable to these demands because she had accepted the transfer in reliance upon GREENE's promise to protect her from further mistreatment.

518. DELACRUZ feared that refusing GREENE's instructions could result in the withdrawal of the very protection GREENE had promised.

D. August–September 2024: Greene's Repeated Instructions to Scan Her Official NYPD Identification Card to Record Her Attendance

519. During August 2024, GREENE began directing DELACRUZ to take GREENE's official NYPD identification card and use it to scan GREENE into the Department's attendance system.

520. The purpose of the scans was to record GREENE as present for duty through the Department's electronic attendance procedures.

521. GREENE did not merely direct DELACRUZ to scan her own identification card when reporting for duty.

522. Instead, GREENE instructed DELACRUZ to use GREENE's identification card to complete an attendance transaction on GREENE's behalf.

523. This conduct occurred on several occasions during August 2024 and continued into September 2024.

524. DELACRUZ performed the attendance transactions pursuant to GREENE's instructions and in the context of GREENE's supervisory authority over her.

525. GREENE was physically present somewhere within the Department's building during these occasions.

526. However, DELACRUZ did not know the precise duration of GREENE's presence in the building or whether the electronic attendance transactions corresponded to GREENE's actual reporting times.

527. DELACRUZ also did not know whether the recorded attendance accurately reflected the complete duration of GREENE's duty periods.

528. The practice nevertheless required DELACRUZ to use another officer's official departmental identification card to record that officer's attendance rather than having that officer personally complete the transaction.

529. GREENE's instructions placed DELACRUZ in a difficult position because she was expected to comply with the directions of her commanding officer while participating in official attendance procedures on that commanding officer's behalf.

530. DELACRUZ alleges that GREENE used her rank and control over DELACRUZ's assignment to obtain compliance with these repeated attendance-related instructions.

531. The attendance-card transactions were part of the broader pattern through which GREENE required DELACRUZ to perform personal and supervisory responsibilities for GREENE's benefit.

532. DELACRUZ's compliance with these instructions reflected the dependency that GREENE had cultivated through promises of protection and her insistence that DELACRUZ take orders directly from her.

E. Greene's Efforts to Silence Discussion of TD1 and Protect Sandhu and Mauriello

533. GREENE knew that DELACRUZ's departure from TD1 was connected to allegations involving SANDHU, MAURIELLO, sexually degrading workplace rumors, and the confrontation involving MONTERO.

534. GREENE nevertheless instructed DELACRUZ that she did not want to hear anything about what had occurred at TD1.

535. GREENE did not encourage DELACRUZ to pursue her complaints concerning the sexual rumors or the supervisory conduct that had contributed to her departure.

536. Instead, GREENE presented the transfer as a fresh start while directing DELACRUZ to discontinue discussion of the underlying events.

537. GREENE also separated DELACRUZ from ordinary supervisory relationships at TD32 by instructing personnel not to approach her and directing her to communicate exclusively with GREENE.

538. DELACRUZ alleges that these measures served two purposes: establishing GREENE's personal control over DELACRUZ and preventing additional scrutiny of the events involving SANDHU and MAURIELLO.

539. The circumstances were particularly significant because SANDHU had participated in arranging DELACRUZ's assignment to GREENE's command.

540. DELACRUZ subsequently continued communicating with SANDHU concerning her deteriorating relationship with GREENE, and SANDHU represented that he remained in contact with GREENE.

541. DELACRUZ alleges that GREENE exploited her desire for protection while effectively removing her from the environment in which her complaints against SANDHU and MAURIELLO had arisen.

542. DELACRUZ further alleges that GREENE's actions operated to protect the professional interests of SANDHU and MAURIELLO while exposing DELACRUZ to additional restrictions, demands, and employment consequences.

F. Greene's Knowledge of Delacruz's Family, Educational, and Military Responsibilities

543. Before DELACRUZ transferred to TD32, GREENE knew that DELACRUZ was raising her son and attempting to balance her NYPD employment with educational and military responsibilities.

544. DELACRUZ intended to pursue a master's degree in Emergency Management at John Jay College of Criminal Justice and participate in Reserve Officers' Training Corps ("ROTC") activities.

545. GREENE knew that DELACRUZ's commute and childcare obligations required a predictable work schedule.

546. GREENE initially promised to assist DELACRUZ with those responsibilities.

547. GREENE agreed to permit DELACRUZ to work an approximately 1100-to-1900 tour so that she could attend school, fulfill family responsibilities, and continue her professional development.

548. During the approximately thirty-day period while DELACRUZ's telephone transfer was being finalized, GREENE permitted DELACRUZ to work the schedule she had requested.

549. During that period, GREENE also kept DELACRUZ working in or near her office.

550. DELACRUZ initially believed these arrangements demonstrated that GREENE intended to honor her promises.

551. However, GREENE subsequently expressed displeasure concerning DELACRUZ's educational commitments.

552. GREENE told DELACRUZ that she was doing too much and needed to choose between attending school and working for the NYPD.

553. GREENE also suggested that DELACRUZ take a year-long leave of absence.

554. These statements contradicted GREENE's earlier representations that she would help DELACRUZ complete her education while continuing her police career.

555. DELACRUZ was distressed because she had never asked GREENE to excuse her from police duties; she had sought predictable scheduling that would permit her to fulfill her employment and family obligations.

G. September 2024: Greene's Assertion of Control Following Completion of the Transfer

556. During the first week of September 2024, DELACRUZ's transfer to TD32 was finalized.

557. Following completion of the transfer, GREENE's treatment of DELACRUZ changed substantially.

558. GREENE stated words to the effect that DELACRUZ was now hers.

559. GREENE further stated words to the effect that she was a Black female captain and that nobody would believe DELACRUZ if she complained about having a problem with GREENE.

560. DELACRUZ understood GREENE's statement as a warning that GREENE could use her rank and position to discredit any complaint DELACRUZ might make.

561. The statement was particularly intimidating because DELACRUZ had already experienced what she believed was supervisory protection of the personnel responsible for the hostile conditions at TD1.

562. DELACRUZ had accepted the transfer believing she would receive assistance and protection, not that she would be subjected to another commanding officer's exclusive personal control.

563. GREENE's statements caused DELACRUZ to fear that challenging GREENE could expose her to additional adverse employment consequences.

564. Following the transfer's completion, GREENE withdrew the scheduling flexibility she had previously provided.

565. GREENE began repeatedly changing DELACRUZ's tours and assignments despite knowing about her childcare, educational, military, and commuting responsibilities.

566. During September 2024 alone, DELACRUZ experienced approximately five changes to her tour.

567. Those changes interfered with her ability to attend classes, participate in military activities, arrange childcare, and maintain adequate rest.

568. GREENE also reversed her earlier directions concerning the chain of command, instructing DELACRUZ to communicate through other supervisors after previously stating that DELACRUZ would take orders only from GREENE.

569. This reversal left DELACRUZ uncertain concerning the supervisory procedures she was expected to follow.

570. DELACRUZ believed that the changing rules and assignments gave GREENE additional opportunities to accuse her of failing to comply with instructions.

H. September 12–18, 2024: Tour Changes, Childcare Difficulties, and Reassignment to TD1

571. On September 12, 2024, GREENE sent DELACRUZ a text message stating that she was accommodating DELACRUZ to the best of her ability.

572. DELACRUZ considered this statement inconsistent with the repeated scheduling changes she was experiencing.

573. On September 13, 2024, Lieutenant MARTINEZ ("MARTINEZ") issued a Public Safety assignment placing DELACRUZ on a tour from 0925 to 1800 hours.

574. DELACRUZ understood that the assignment changes were being directed by GREENE and communicated through subordinate supervisors.

575. On September 15, 2024, DELACRUZ was reassigned from crime analysis to Public Safety, with a tour running from 1930 to 0405 hours.

576. This overnight tour created an immediate childcare problem because DELACRUZ lacked anyone available to care for her son during those hours.

577. DELACRUZ's mother, who resided in Brooklyn, was experiencing medical difficulties and could not travel to DELACRUZ's residence to assist with childcare.

578. DELACRUZ had previously explained these circumstances to GREENE.

579. Because DELACRUZ could not secure childcare, she took an emergency day ("E-day") on September 15, 2024.

580. Thereafter, DELACRUZ learned that the sergeant who had approved the E-day had been criticized or otherwise confronted concerning the approval.

581. DELACRUZ also observed a notice at the command stating that E-days could not be approved without GREENE's knowledge or authorization.

582. GREENE was upset that DELACRUZ had taken the E-day.

583. DELACRUZ perceived GREENE's reaction as punishment for a childcare emergency that GREENE knew was related to the repeated changes in DELACRUZ's work schedule.

584. On September 17, 2024, MARTINEZ provided DELACRUZ with a notification directing her to report to TD1 for a Mobile Field Force detail.

585. When DELACRUZ questioned the assignment, MARTINEZ informed her that GREENE had directed that the notification be issued.

586. DELACRUZ explained that TD1 was the command from which she had transferred after experiencing sexually hostile working conditions and supervisory mistreatment.

587. GREENE knew those circumstances because DELACRUZ had disclosed them before accepting the transfer to TD32.

588. Nevertheless, GREENE directed DELACRUZ to return to the very command she had left seeking protection.

589. On September 18, 2024, Lieutenant FIELDS ("FIELDS") and Sergeant SANATA ("SANATA") met with DELACRUZ concerning the notification.

590. DELACRUZ explained her concerns about returning to TD1, the repeated tour changes, exhaustion, and the safety risks associated with her lengthy commute.

591. FIELDS responded with statements to the effect that the NYPD did not care whether DELACRUZ crashed while driving home and that her employment was "just a job."

592. FIELDS further stated words to the effect of, "This department doesn't give a fuck about you. I don't give a fuck about you. You do what you need to do."

593. DELACRUZ recorded the conversation because she wanted to preserve what was being said about her safety and working conditions.

594. Upon learning that DELACRUZ had recorded the conversation, FIELDS became upset.

595. FIELDS stated that he did not want to become involved in the conflict between DELACRUZ and GREENE.

596. DELACRUZ was directed to sign the notification notwithstanding her objections.

597. On September 18, 2024, DELACRUZ's tour was again changed to 1930 to 0405 hours.

598. DELACRUZ believed that GREENE was using assignments and scheduling decisions to punish her after she complained about conditions at TD32 and took an E-day to address her childcare responsibilities.

I. September 19, 2024: Greene's Treatment of Delacruz Following a Line-of-Duty Injury

599. On September 19, 2024, DELACRUZ assisted her partner, Police Officer Jedsen Ramos, during an arrest involving a resisting suspect.

600. Ramos had initiated the police encounter, and DELACRUZ assisted when the suspect resisted arrest.

601. During the incident, DELACRUZ sustained an injury to her right shoulder and was exposed to pepper spray.

602. DELACRUZ sought hospital treatment for her injuries.

603. Rather than initially focusing upon DELACRUZ's injuries and medical condition, GREENE accused or questioned DELACRUZ concerning the possible use of excessive force.

604. DELACRUZ maintained that she had been assisting RAMOS and had not initiated the confrontation.

605. Following her return from the hospital, DELACRUZ continued experiencing impaired vision and irritation resulting from pepper spray exposure.

606. DELACRUZ was required to remain at the command for several hours after her regular tour ended while awaiting the Executive Officer.

607. The Executive Officer arrived at approximately 8:30 a.m., according to DELACRUZ's recollection.

608. Thereafter, Captain Ravi Singh communicated an instruction directing DELACRUZ to work an additional 0530-to-1730 tour.

609. DELACRUZ understood that the instruction originated with GREENE.

610. DELACRUZ explained that she could barely see because of the pepper spray exposure and was experiencing limitations associated with her injured right shoulder.

611. Nevertheless, DELACRUZ felt pressured to comply because she feared disciplinary consequences if she refused.

612. DELACRUZ contacted a union delegate seeking assistance concerning the order and whether she could leave to recover.

613. DELACRUZ also raised concerns about approximately five hours of overtime compensation for the period she was required to remain at the command after her scheduled tour.

614. Following the incident, DELACRUZ was removed from the Crime Team and reassigned to patrol duties.

615. Ramos, who had initiated the police encounter, remained assigned to the Crime Team.

616. DELACRUZ regarded the difference in treatment as significant because both officers participated in the arrest, but DELACRUZ was the officer injured and subsequently removed from the assignment.

617. DELACRUZ believed GREENE was using the arrest incident and her resulting injury as additional grounds for unfavorable treatment.

J. September–October 2024: Medical Treatment, Supervisory Monitoring, and Threatened Evaluations

618. On September 22, 2024, DELACRUZ was reassigned to Squad B, with a tour from 0530 to 1730 hours.

619. The continued changes to DELACRUZ's work schedule interfered with her ability to arrange medical appointments and transportation.

620. On September 30, 2024, DELACRUZ attended an appointment with her surgeon concerning her line-of-duty shoulder injury.

621. The appointment occurred on her regularly scheduled day off.

622. After leaving the surgeon's office, DELACRUZ received a text message from Sergeant Jhonny J. Milfort informing her that Lieutenant Maxim Katz wanted her to report to TD32.

623. DELACRUZ explained that she was on her regular day off and had just attended a medical appointment.

624. Milfort nevertheless informed her that she needed to report to work or go sick again.

625. DELACRUZ believed that command personnel were disregarding her medical circumstances while creating additional opportunities to question her compliance.

626. DELACRUZ also became concerned that supervisors were being pressured to issue unfavorable performance evaluations.

627. DELACRUZ had been moved between assignments so frequently that some supervisors had limited opportunities to observe her work over a sustained period.

628. She believed these circumstances undermined the fairness of any evaluation prepared by a supervisor who had worked with her only briefly.

629. In approximately October 2024, DELACRUZ began experiencing repeated Absence and Control visits while recovering from her line-of-duty injury.

630. Sergeant Franklyn Abreu visited DELACRUZ's residence, including visits occurring on Fridays, and required her to sign the attendance or visitation log.

631. Abreu informed DELACRUZ that someone was repeatedly calling concerning her status.

632. DELACRUZ suspected that GREENE was responsible for the repeated inquiries but did not personally identify the caller.

633. The visits contributed to DELACRUZ's perception that she remained under unusual scrutiny while attempting to recover from her injury.

634. On October 16, 2024, KATZ imposed or communicated restrictions that made it difficult for DELACRUZ to attend physical therapy.

635. DELACRUZ was afforded approximately one hour to travel from 960 Carroll Street in Brooklyn to a physical therapy location at 253 Route 211 East in Middletown, New York.

636. DELACRUZ could not complete that trip within the time allotted and consequently missed treatment appointments.

637. On October 17, 2024, DELACRUZ contacted Employee Assistance and spoke with Police Officer Gonzalez concerning the difficulties attending physical therapy.

638. DELACRUZ believed that the combination of scheduling restrictions, supervisory scrutiny, and disciplinary threats was interfering with the medical treatment she needed to recover from her line-of-duty injury.

K. October 2024: Sandhu's Continuing Communications with Greene and His Statements About Her Intentions

639. During October 2024, DELACRUZ continued communicating with SANDHU concerning the difficulties she was experiencing at TD32.

640. DELACRUZ discussed her shoulder injury, commute, changing assignments, medical treatment, and dissatisfaction with GREENE's treatment of her.

641. SANDHU represented that he remained in contact with GREENE and relayed information concerning GREENE's reported attitude toward DELACRUZ.

642. SANDHU repeatedly told DELACRUZ that GREENE was angry with her and wanted to "break" her down.

643. SANDHU further reported that GREENE wanted DELACRUZ to return to working directly for her and would permit DELACRUZ to leave only when GREENE decided to release her.

644. SANDHU also characterized GREENE as obsessed with DELACRUZ and reported that GREENE believed she had spoiled DELACRUZ too much.

645. During these communications, DELACRUZ was described as a "problem child."

646. DELACRUZ understood these statements as information SANDHU was relaying concerning his communications with GREENE.

647. The statements caused DELACRUZ to believe that GREENE was intentionally using supervisory personnel and employment decisions to undermine her.

648. DELACRUZ's concerns were heightened because GREENE and SANDHU had been involved in arranging her transfer from TD1.

649. DELACRUZ believed that GREENE's treatment was connected to the controversy involving SANDHU and MAURIELLO and that she was being punished rather than protected.

650. The continuing communication between SANDHU and GREENE reinforced DELACRUZ's perception that the events at TD1 were influencing her subsequent treatment at TD32.

L. November 8, 2024: Two Command Disciplines, Greene's Confrontation, and Delacruz's Missed Physical Therapy

651. On November 8, 2024, DELACRUZ encountered Police Benevolent Association delegate Police Officer Michael A. McPhee at TD32.

652. McPhee proceeded to GREENE's office concerning disciplinary action involving DELACRUZ.

653. DELACRUZ learned that GREENE intended to issue a Command Discipline ("CD") alleging lateness.

654. DELACRUZ disputed the allegation because she had previously telephoned the command desk to report that she would be late.

655. DELACRUZ also maintained that she had entered the appropriate departmental notification in the system.

656. DELACRUZ believed her telephone records and departmental entries would corroborate that she had notified the command.

657. Nevertheless, DELACRUZ was issued the CD.

658. GREENE told DELACRUZ not to worry about the discipline because it was only an admonishment.

659. DELACRUZ was dissatisfied because she believed her explanation and supporting records had not been fairly considered.

660. While discussing the matter with McPhee, DELACRUZ explained that she needed to sign paperwork using her left hand because her right shoulder remained injured.

661. During the exchange, GREENE confronted DELACRUZ, asking, "Did you just say 'fuck' in a FIPPU report?"

662. DELACRUZ responded, "Captain, so did you."

663. GREENE became angry and repeatedly ordered DELACRUZ out of the office, stating, "Get out, get out, get out."

664. DELACRUZ complied and left the office.

665. However, DELACRUZ remained at the command for approximately ninety minutes while the disciplinary matter continued.

666. DELACRUZ had a scheduled physical therapy appointment concerning her line-of-duty injury.

667. GREENE was aware that DELACRUZ needed to attend medical treatment.

668. DELACRUZ contacted McPhee and explained that she needed to leave for physical therapy.

669. McPhee advised DELACRUZ to remain because she could face suspension if she left.

670. While DELACRUZ was waiting, another sergeant approached her with a second Command Discipline.

671. The second discipline was a B-level Command Discipline alleging discourtesy.

672. DELACRUZ understood the discourtesy allegation to arise from the confrontation with GREENE and her use of the word "fuck."

673. DELACRUZ questioned the second discipline, asking McPhee, "Are you serious?"

674. McPhee responded, "Maria, just sign the CD."

675. DELACRUZ felt pressured to sign the disciplinary paperwork rather than challenge the allegations.

676. The prolonged disciplinary proceedings caused DELACRUZ to miss her scheduled physical therapy appointment.

677. DELACRUZ became visibly upset and cried because she believed the command was prioritizing disciplinary action over her medical treatment.

678. DELACRUZ alleges that GREENE used the disciplinary process to intimidate and punish her while she was attempting to recover from a documented line-of-duty injury.

M. Lieutenant William L. Fields' Request to Delete a Recording and Delacruz's Transfer to Legal Borough

679. During the same general period, Fields approached DELACRUZ concerning the recording she had made of his statements about her commute, exhaustion, and the NYPD's disregard for her safety.

680. Fields stated words to the effect of, "If you delete my video, I will get you out of here."

681. DELACRUZ understood the statement as an offer to assist her in leaving TD32 if she deleted the recording.

682. DELACRUZ was uncomfortable because the recording preserved statements she considered important evidence of how her safety complaints had been handled.

683. DELACRUZ subsequently learned that personnel associated with the borough command were involved in facilitating her assignment to Legal Bureau.

684. DELACRUZ understood that the proposed reassignment was connected to the discussions concerning the recording.

685. On or about November 16, 2024, DELACRUZ was transferred from TD32 to an assignment within Legal Bureau.

686. DELACRUZ welcomed the transfer because she had become fearful that continued exposure to GREENE's disciplinary and supervisory practices would jeopardize her employment.

N. November 2024–June 2025: Delacruz's Favorable Employment Experience Outside Greene's Command

687. Following her transfer, DELACRUZ was assigned to the Legal Bureau Body-Worn Camera Unit.

688. Her responsibilities included reviewing, organizing, and tagging body-worn camera footage, including recordings associated with potential litigation.

689. DELACRUZ performed those duties without experiencing the same recurring conflicts that had characterized her assignment under GREENE.

690. DELACRUZ was also able to attend physical therapy without the same scheduling interference she had experienced at TD32.

691. During her Legal Bureau assignment, DELACRUZ received a favorable performance evaluation.

692. The favorable evaluation was particularly meaningful because DELACRUZ had previously been concerned that supervisors at TD32 were attempting to document unfavorable performance.

693. DELACRUZ remained in the Legal Bureau assignment from approximately November 2024 until June 2025.

694. During this period, she experienced greater stability in her assignments, improved access to medical treatment, and reduced anxiety concerning disciplinary action.

695. DELACRUZ regarded the difference between her experience at Legal Bureau and her experience under GREENE as evidence that the difficulties at TD32 were not inherent in her ability to perform police duties.

696. Rather, DELACRUZ believed her unfavorable treatment was associated with GREENE's exercise of command authority and the supervisory personnel implementing GREENE's decisions.

O. July–August 2025: Military Obligations and Renewed Difficulties Upon Return to TD32

697. In 2025, DELACRUZ undertook additional military obligations while attempting to maintain her NYPD employment.

698. On or about July 27, 2025, DELACRUZ departed for approximately one month of military service or training.

699. On July 31, 2025, DELACRUZ learned that departmental personnel had contacted military authorities to verify the legitimacy of documentation associated with her service.

700. DELACRUZ was concerned about the scrutiny because she had been attempting to comply with the Department's procedures while fulfilling her military responsibilities.

701. Upon returning to TD32, DELACRUZ experienced renewed difficulties obtaining clear information concerning her assignments and work schedule.

702. On August 4, 2025, DELACRUZ sought clarification from GREENE concerning the tour she was expected to work.

703. DELACRUZ was unable to obtain the clear scheduling information she needed.

704. During this period, DELACRUZ was also pursuing professional opportunities and departmental recognition, including an award for which she had been selected.

705. On August 5, 2025, DELACRUZ was directed to retrieve her departmental telephone from One Police Plaza.

706. The assignment was communicated during the late afternoon, when DELACRUZ understood the relevant telephone unit to be closed.

707. DELACRUZ explained that she needed to report during the unit's operating hours to retrieve the telephone.

708. Nevertheless, DELACRUZ was instructed to travel to One Police Plaza in a departmental vehicle.

709. DELACRUZ complied and traveled to the location but was unable to complete the retrieval because the unit was closed.

710. DELACRUZ believed that the circumstances placed her at risk of being accused of failing to perform an assignment despite having explained the operational problem beforehand.

711. DELACRUZ also became concerned about the possibility that her use of the departmental vehicle was being monitored for disciplinary purposes.

712. DELACRUZ perceived the incident as another example of receiving instructions that were difficult or impossible to complete while remaining subject to criticism for the outcome.

P. August 6–8, 2025: Interference with Employee Assistance and Greene's Opposition to Delacruz's Transfer

713. On August 6, 2025, DELACRUZ attempted to speak with a Police Officer identified as Michelle from the Employee Assistance Unit ("EAU").

714. During that interaction, Lieutenants Mei Pan and Katz ordered DELACRUZ to leave the command.

715. DELACRUZ recalled that the EAU officer was also directed to leave.

716. DELACRUZ was warned that she could be suspended if she failed to comply with the direction to leave.

717. DELACRUZ was distressed because she was seeking assistance concerning the employment conditions that had again become intolerable.

718. On August 7, 2025, DELACRUZ contacted EAU and sought assistance obtaining reassignment to a command in the Bronx.

719. DELACRUZ wanted to continue serving as an NYPD officer but no longer believed she could work safely and effectively under GREENE's command.

720. DELACRUZ understood that GREENE became angry upon learning of her efforts to obtain assistance and reassignment.

721. DELACRUZ further understood that GREENE communicated with senior Transit Bureau personnel concerning the proposed transfer.

722. During this period, DELACRUZ was described as a "problem child."

723. DELACRUZ was informed that she would be required to remain at TD32 for an additional period and demonstrate satisfactory behavior before a transfer would be authorized.

724. DELACRUZ regarded that condition as punitive because she was seeking relief from the circumstances she had repeatedly reported.

725. DELACRUZ believed GREENE was using her access to senior command personnel to obstruct DELACRUZ's efforts to leave TD32.

726. On August 8, 2025, DELACRUZ received a new assignment to Squad B, with a tour running from 1800 to 0600 hours.

727. DELACRUZ understood that GREENE had directed the assignment.

728. The overnight tour again interfered with DELACRUZ's ability to manage childcare, obtain adequate rest, and maintain stability in her personal and professional responsibilities.

Q. September 1–2, 2025: Extreme Fatigue, Threatened Suspension, and Delacruz's Request for EAU Intervention

729. On September 1, 2025, DELACRUZ worked an extended J'ouvert detail.

730. According to DELACRUZ's recollection, her combined assignments required approximately nineteen hours of duty.

731. DELACRUZ recalled completing one assignment at approximately 1540 hours and being required to return to duty at approximately 1800 hours.

732. DELACRUZ returned home, showered, and traveled back to work without obtaining meaningful sleep.

733. DELACRUZ believed she had remained awake for more than twenty-four hours.

734. Upon returning to duty, DELACRUZ informed Milfort that she was exhausted and had not slept.

735. DELACRUZ explained that she did not believe she could safely perform a standing post under those conditions.

736. DELACRUZ was concerned about her own safety, the safety of coworkers, and the safety of members of the public.

737. Milfort nevertheless instructed DELACRUZ to sign the assignment notification.

738. DELACRUZ recalled Milfort warning that she could be suspended if she refused.

739. DELACRUZ became emotionally overwhelmed and began crying.

740. DELACRUZ believed she had reached a point at which the repeated scheduling problems, disciplinary threats, medical difficulties, and inability to obtain reassignment had become unbearable.

741. DELACRUZ contacted EAU and requested assistance.

742. DELACRUZ requested that her firearms be taken because she did not believe she could continue working under the existing conditions.

743. On September 2, 2025, DELACRUZ surrendered her departmental firearms in connection with her request for EAU intervention.

744. DELACRUZ had not sought to abandon her police career. She wanted assistance escaping the conditions she believed were jeopardizing her health, employment, and ability to function safely.

745. DELACRUZ also understood that Chief of Transportation Joseph M. Gulotta had declined to approve a requested transfer after communications involving GREENE.

746. DELACRUZ believed GREENE's involvement contributed to the denial or obstruction of reassignment.

747. By this point, DELACRUZ feared that remaining at TD32 would expose her to additional disciplinary actions, exhaustion, and emotional distress.

R. Greene's Exploitation of Delacruz and the Continuation of the Hostile and Retaliatory Working Environment

748. DELACRUZ accepted the transfer to TD32 because GREENE promised to protect her from the sexually hostile conditions, she had experienced at TD1.

749. GREENE knew that DELACRUZ had complained about rumors involving SANDHU and the conduct of MAURIELLO.

750. GREENE also knew that DELACRUZ was seeking a working environment in which she could continue her police career without further humiliation or retaliation.

751. Rather than encourage DELACRUZ to pursue the underlying complaints, GREENE directed her not to discuss the events at TD1.

752. GREENE then asserted exclusive supervisory control over DELACRUZ and required her to perform personal errands, office tasks, and supervisory responsibilities.

753. GREENE also repeatedly directed DELACRUZ to use GREENE's official NYPD identification card to record GREENE's presence for duty through the Department's electronic attendance system.

754. After DELACRUZ's transfer became final, GREENE allegedly asserted that DELACRUZ belonged to her and that nobody would believe DELACRUZ if she complained about GREENE.

755. GREENE thereafter withdrew promised scheduling flexibility, changed DELACRUZ's tours repeatedly, and directed or participated in employment actions that interfered with her childcare, education, medical treatment, and military responsibilities.

756. GREENE also participated in disciplinary proceedings and opposed DELACRUZ's efforts to obtain reassignment from TD32.

757. DELACRUZ alleges that GREENE used the promise of protection to obtain DELACRUZ's trust and dependence and subsequently exploited that relationship through supervisory demands and unfavorable employment decisions.

758. DELACRUZ further alleges that GREENE's conduct enabled SANDHU and MAURIELLO to avoid additional scrutiny concerning the circumstances that had prompted DELACRUZ's departure from TD1.

759. The pattern of conduct reinforced DELACRUZ's belief that the Department's supervisory hierarchy was protecting senior personnel while punishing the subordinate officer who had complained about sexually degrading conduct and supervisory misconduct.

760. The difference between DELACRUZ's experience under GREENE and her subsequent favorable performance at Legal Borough further informed DELACRUZ's belief that her difficulties were attributable to discriminatory and retaliatory supervisory treatment rather than deficiencies in her performance as a police officer.

761. GREENE's conduct caused DELACRUZ substantial humiliation, anxiety, emotional distress, interference with medical treatment, disruption of family and educational obligations, and fear concerning her professional future.

762. The cumulative consequences of the alleged conduct ultimately contributed to DELACRUZ's request for EAU intervention and her surrender of departmental firearms on September 2, 2025.

763. DELACRUZ alleges that GREENE's actions constituted a continuation of the discriminatory, sexually hostile, and retaliatory employment conditions that began at TD1 and followed DELACRUZ into her subsequent assignment at TD32.

IX. Police Commissioner Jessica S. Tisch and the City of New York: Institutional Responsibility and Failure to Prevent Discrimination, Sexual Harassment, and Retaliation

764. At all relevant times, defendant JESSICA S. TISCH ("TISCH"), as Police Commissioner of the New York City Police Department ("NYPD"), exercised executive authority over the Department's operations, supervisory personnel, disciplinary procedures, and enforcement of policies prohibiting employment discrimination, sexual harassment, and retaliation.

765. Defendant THE CITY OF NEW YORK ("CITY") employed DELACRUZ and the individual NYPD defendants identified herein, including TISCH, MAURIELLO, SANDHU, GREENE, FRANCO, and MONTERO.

766. The individual defendants engaged in the conduct alleged herein while exercising, or acting in connection with, their departmental positions, employment responsibilities, and supervisory authority.

767. Through its supervisory personnel, the CITY received notice of DELACRUZ's complaints concerning sexually degrading workplace rumors, intimidation, supervisory misconduct, and the confrontation involving MONTERO on July 17, 2024.

768. The Department documented the July 17, 2024 incident under Internal Affairs Bureau Log No. 2024-21122 but failed to meaningfully address the sexual allegations and supervisory misconduct underlying DELACRUZ's complaints.

769. Rather than provide effective protection against further mistreatment, departmental supervisors facilitated DELACRUZ's transfer from TD1 to TD32, where she alleges that additional discriminatory and retaliatory conduct occurred under GREENE's authority.

770. The subsequent conduct included repeated changes to DELACRUZ's assignments and tours, interference with medical treatment and other responsibilities, disciplinary proceedings, and opposition to her requests for reassignment.

771. DELACRUZ repeatedly sought assistance through departmental supervisors, union representatives, and the Employee Assistance Unit, thereby providing additional opportunities for the Department to address her deteriorating employment conditions.

772. Notwithstanding these complaints and requests for assistance, the CITY failed to take effective corrective action sufficient to prevent the continuation of the alleged discriminatory, sexually hostile, and retaliatory treatment.

773. TISCH, as Police Commissioner, possessed ultimate executive responsibility for the Department's supervisory and disciplinary systems through which DELACRUZ's complaints and employment circumstances were addressed.

774. The CITY, acting through its managerial and supervisory employees, permitted the conduct alleged herein to continue, causing DELACRUZ professional harm, emotional distress, and interference with her employment, medical treatment, and personal responsibilities.

775. As a result of the foregoing conduct, DELACRUZ suffered damages for which the CITY and the responsible individual defendants are liable under the New York State Human Rights Law and the New York City Human Rights Law.

VIOLATIONS AND CLAIMS ALLEGED

First Cause of Action
Race, National Origin, and Sex Discrimination —
NYSHRL, Executive Law § 296(1)(a) and (6)

776. Plaintiff repeats and realleges paragraphs 1 through 775 as though fully set forth herein.

777. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

778. Defendant FRANCO subjected DELACRUZ to discriminatory supervisory treatment, disparaging remarks, unfavorable scheduling decisions, and sexualized assumptions concerning her relationship with SANDHU, while MONTERO subjected DELACRUZ to sexually degrading accusations and intimidation based upon those assumptions.

779. Defendant SANDHU exploited DELACRUZ's sex and subordinate employment status through unwanted sexual attention and unequal supervisory treatment, while MAURIELLO participated in sexually degrading workplace speculation, dismissed DELACRUZ's complaints, and used his command authority in connection with her reassignment.

780. Defendant GREENE exploited DELACRUZ's vulnerability following her complaints, asserted discriminatory supervisory control, imposed unfavorable assignments and

disciplinary measures, and threatened DELACRUZ's credibility by invoking GREENE's race, sex, and supervisory rank.

781. Defendant TISCH, acting through her official authority as Police Commissioner, and defendant THE CITY OF NEW YORK maintained the supervisory, employment, and disciplinary systems through which the discriminatory treatment occurred and failed to provide effective corrective protection.

782. The foregoing defendants discriminated against DELACRUZ because of her race, Dominican national origin, and sex, subjecting her to inferior terms, conditions, and privileges of employment. Each individual defendant directly participated in or aided and abetted the discriminatory practices attributable to that defendant, in violation of Executive Law § 296(1)(a) and (6).

Second Cause of Action
Sexual Harassment —
NYSHRL, Executive Law § 296(1)(h) and (6)

783. Plaintiff repeats and realleges paragraphs 1 through 782 as though fully set forth herein.

784. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

785. Defendant SANDHU subjected DELACRUZ to unwanted sexual advances, sexually explicit comments, intrusive questions concerning her sexual activities, unwanted physical conduct, and unsolicited pornographic material.

786. Defendant FRANCO contributed to the sexual harassment through sexualized workplace ridicule and insinuations concerning DELACRUZ's relationship with SANDHU, while MONTERO confronted DELACRUZ inside the women's locker room and accused her of "fucking the captain."

787. Defendant MAURIELLO participated in the circulation of sexual rumors, reinforced the allegations concerning DELACRUZ and SANDHU, dismissed DELACRUZ's complaints, and attempted to restrict the scope of her objections.

788. Defendant GREENE exploited the consequences of the sexual harassment by discouraging DELACRUZ from discussing the events at TD1, isolating her from ordinary supervision, exercising personal control over her employment, and subjecting her to additional unfavorable treatment.

789. Defendant THE CITY OF NEW YORK, through its supervisory personnel, permitted the sexual harassment to continue without effective correction. Defendant TISCH, in her official capacity, exercised executive responsibility over the Department's supervisory, investigative, and disciplinary practices.

790. The foregoing conduct subjected DELACRUZ to inferior terms, conditions, and privileges of employment because of her sex. The individual defendants directly participated in or aided and abetted the harassment attributable to them, in violation of Executive Law § 296(1)(h) and (6), without requiring that the harassment be severe or pervasive.

Third Cause of Action
Hostile Work Environment —
NYSHRL, Executive Law § 296(1)(h) and (6)

791. Plaintiff repeats and realleges paragraphs 1 through 790 as though fully set forth herein.

792. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

793. Defendant FRANCO contributed to the hostile working environment through discriminatory supervisory treatment, disparaging remarks, and sexualized ridicule, while MONTERO subjected DELACRUZ to sexually degrading accusations and an intimidating confrontation inside the women's locker room.

794. Defendant SANDHU subjected DELACRUZ to unwanted sexual conduct and exploited his supervisory authority, while MAURIELLO reinforced the sexual rumors, dismissed DELACRUZ's complaints, and participated in supervisory practices that failed to correct the hostile conditions.

795. Defendant GREENE continued the hostile employment conditions by exploiting DELACRUZ's dependence, compelling personal and supervisory services, directing her to record GREENE's attendance, making intimidating statements concerning DELACRUZ's credibility, imposing disruptive assignments, and facilitating disciplinary pressure.

796. Defendant THE CITY OF NEW YORK maintained the hostile working conditions through its supervisory personnel and inadequate corrective response. Defendant TISCH exercised executive authority over the Department's supervision, investigations, and disciplinary accountability.

797. The individual and collective conduct of the foregoing defendants subjected DELACRUZ to inferior terms, conditions, and privileges of employment because of her protected characteristics, exceeding petty slights or trivial inconveniences. Each individual

defendant directly participated in or aided and abetted the hostile conditions attributable to that defendant, in violation of Executive Law § 296(1)(h) and (6). Severe or pervasive harassment is not required.

Fourth Cause of Action
Retaliation —
NYSHRL, Executive Law § 296(7) and (6)

798. Plaintiff repeats and realleges paragraphs 1 through 797 as though fully set forth herein.

799. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

800. DELACRUZ engaged in protected activity by opposing discriminatory treatment, unwanted sexual conduct, sexually degrading workplace rumors, intimidation, and supervisory misconduct, and by seeking protection from those practices.

801. Defendant FRANCO contributed to the discriminatory supervisory conditions DELACRUZ opposed, while MONTERO subjected DELACRUZ to the sexually degrading locker-room confrontation that prompted her complaints and request for protection.

802. Defendant MAURIELLO attempted to condition DELACRUZ's reassignment upon restricting her complaint, while SANDHU participated in the arrangements transferring DELACRUZ from TD1 and continued communicating with GREENE concerning DELACRUZ's treatment and employment circumstances.

803. Defendant GREENE retaliated by discouraging further discussion of the TD1 misconduct, asserting exclusive supervisory control, withdrawing promised accommodations,

repeatedly changing assignments, facilitating disciplinary actions, and opposing DELACRUZ's subsequent efforts to obtain reassignment.

804. Defendant THE CITY OF NEW YORK permitted the retaliatory practices to continue through its supervisory and managerial personnel, while defendant TISCH, acting in her official capacity, exercised executive authority over the Department's supervisory and corrective procedures.

805. The retaliatory conduct was reasonably likely to deter DELACRUZ from opposing practices prohibited by the NYSHRL. Each individual defendant directly participated in or aided and abetted the retaliatory acts attributable to that defendant, in violation of Executive Law § 296(7) and (6).

Fifth Cause of Action
Race, National Origin, and Gender Discrimination —
NYCHRL, Administrative Code § 8-107(1)(a) and (6)

806. Plaintiff repeats and realleges paragraphs 1 through 805 as though fully set forth herein.

807. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

808. Defendant FRANCO subjected DELACRUZ to discriminatory supervisory treatment, disparaging remarks, unfavorable scheduling decisions, and sexualized assumptions concerning her relationship with SANDHU, while MONTERO subjected DELACRUZ to degrading accusations and intimidation based upon those assumptions.

809. Defendant SANDHU exploited DELACRUZ's gender and subordinate employment status through unwanted sexual attention and unequal supervisory treatment, while MAURIELLO participated in sexually degrading workplace speculation, dismissed DELACRUZ's complaints, and exercised command authority in connection with her reassignment.

810. Defendant GREENE exploited DELACRUZ's vulnerability following her complaints, imposed unfavorable assignments and disciplinary measures, exercised discriminatory supervisory control, and threatened DELACRUZ's credibility by invoking GREENE's race, gender, and supervisory rank.

811. Defendant TISCH, acting through her official authority as Police Commissioner, and defendant THE CITY OF NEW YORK maintained the supervisory and disciplinary systems through which the discriminatory treatment occurred and failed to provide effective corrective protection.

812. The foregoing defendants treated DELACRUZ less well because of her race, Dominican national origin, and gender, in violation of Administrative Code § 8-107(1)(a). Each individual defendant directly participated in or aided and abetted the discriminatory practices attributable to that defendant, in violation of Administrative Code § 8-107(6).

Sixth Cause of Action
Sexual Harassment —
NYCHRL, Administrative Code § 8-107(1)(a) and (6)

813. Plaintiff repeats and realleges paragraphs 1 through 812 as though fully set forth herein.

814. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA

GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

815. Defendant SANDHU subjected DELACRUZ to unwanted sexual advances, sexually explicit comments, intrusive questions concerning her sexual activities, unwanted physical conduct, and unsolicited pornographic material.

816. Defendant FRANCO contributed to the sexual harassment through sexualized workplace ridicule and insinuations concerning DELACRUZ's relationship with SANDHU, while MONTERO confronted DELACRUZ inside the women's locker room and accused her of "fucking the captain."

817. Defendant MAURIELLO participated in the circulation of sexual rumors, reinforced allegations concerning DELACRUZ and SANDHU, dismissed DELACRUZ's complaints, and attempted to restrict the scope of her objections.

818. Defendant GREENE exploited the consequences of the sexual harassment by discouraging DELACRUZ from discussing the events at TD1, isolating her from ordinary supervision, exercising personal control over her employment, and subjecting her to additional unfavorable treatment.

819. Defendant THE CITY OF NEW YORK, through its supervisory personnel, permitted the sexual harassment to continue without effective correction. Defendant TISCH exercised executive authority over the Department's supervisory, investigative, and disciplinary practices.

820. The foregoing defendants subjected DELACRUZ to differential treatment because of her gender, causing her to be treated less well in the terms, conditions, and privileges of employment. Each individual defendant directly participated in or aided and abetted the sexual

harassment attributable to that defendant, in violation of Administrative Code § 8-107(1)(a) and (6).

Seventh Cause of Action
Hostile Work Environment —
NYCHRL, Administrative Code § 8-107(1)(a) and (6)

821. Plaintiff repeats and realleges paragraphs 1 through 820 as though fully set forth herein.

822. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

823. Defendant FRANCO contributed to the hostile working environment through discriminatory supervisory treatment, disparaging remarks, and sexualized ridicule, while MONTERO subjected DELACRUZ to degrading sexual accusations and an intimidating confrontation inside the women's locker room.

824. Defendant SANDHU subjected DELACRUZ to unwanted sexual conduct and exploited his supervisory authority, while MAURIELLO reinforced sexual rumors, dismissed DELACRUZ's complaints, and participated in supervisory practices that failed to correct the hostile conditions.

825. Defendant GREENE continued the hostile employment conditions by exploiting DELACRUZ's dependence, compelling personal and supervisory services, directing her to record GREENE's attendance, making intimidating statements concerning DELACRUZ's credibility, imposing disruptive assignments, and facilitating disciplinary pressure.

826. Defendant THE CITY OF NEW YORK maintained the hostile conditions through its supervisory personnel and inadequate corrective response, while defendant TISCH exercised executive authority over the Department's supervisory, investigative, and disciplinary systems.

827. The individual and collective conduct of the foregoing defendants caused DELACRUZ to be treated less well because of her race, Dominican national origin, and gender, exceeding petty slights or trivial inconveniences. Each individual defendant directly participated in or aided and abetted the hostile working environment attributable to that defendant, in violation of Administrative Code § 8-107(1)(a) and (6).

Eighth Cause of Action
Retaliation —
NYCHRL, Administrative Code § 8-107(7) and (6)

828. Plaintiff repeats and realleges paragraphs 1 through 827 as though fully set forth herein.

829. This cause of action is asserted against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO. The individual defendants are sued in their individual and official capacities.

830. DELACRUZ engaged in protected activity by opposing discriminatory treatment, unwanted sexual conduct, sexually degrading workplace rumors, intimidation, and supervisory misconduct, and by seeking protection from those practices.

831. Defendant FRANCO participated in the discriminatory supervisory treatment DELACRUZ opposed, while MONTERO subjected DELACRUZ to the sexually degrading locker-room confrontation that prompted her complaints and requests for protection.

832. Defendant MAURIELLO attempted to condition DELACRUZ's reassignment upon restricting her complaint, while SANDHU participated in the arrangements transferring DELACRUZ from TD1 and continued communicating with GREENE concerning her employment circumstances.

833. Defendant GREENE retaliated by discouraging further discussion of the TD1 misconduct, asserting exclusive supervisory control, withdrawing promised accommodations, repeatedly changing assignments, facilitating disciplinary measures, and opposing DELACRUZ's subsequent efforts to obtain reassignment.

834. Defendant THE CITY OF NEW YORK permitted the retaliatory practices to continue through its supervisory and managerial personnel, while defendant TISCH exercised executive authority over the Department's supervisory, investigative, and corrective procedures.

835. The foregoing retaliatory conduct was reasonably likely to deter DELACRUZ from engaging in protected activity, regardless of whether it resulted in an ultimate employment action. Each individual defendant directly participated in or aided and abetted the retaliatory practices attributable to that defendant, in violation of Administrative Code § 8-107(7) and (6).

JURY TRIAL

836. Plaintiff MARIA A. DELACRUZ hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff MARIA A. DELACRUZ respectfully demands judgment against defendants THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and

ROSARIO E. MONTERO, with the individual defendants sued in their individual and official capacities, jointly and severally to the extent permitted by law, as follows:

a. Declaring that defendants violated plaintiff's rights under the New York State Human Rights Law ("NYSHRL"), Executive Law § 296, through unlawful discrimination, sexual harassment, hostile work environment, retaliation, and aiding and abetting;

b. Declaring that defendants violated plaintiff's rights under the New York City Human Rights Law ("NYCHRL"), Administrative Code § 8-107, through unlawful discrimination, sexual harassment, hostile work environment, retaliation, and aiding and abetting;

c. Awarding plaintiff compensatory damages for emotional distress, humiliation, embarrassment, anxiety, fear, loss of dignity, reputational injury, professional harm, and other noneconomic injuries in an amount to be determined at trial;

d. Awarding plaintiff economic damages, including lost wages, overtime compensation, employment benefits, promotional opportunities, pension-related losses, medical expenses, and other consequential financial injuries attributable to defendants' unlawful conduct, in amounts established at trial;

e. Awarding plaintiff back pay, front pay, and other appropriate monetary relief necessary to restore her to the financial position she would have occupied absent defendants' discriminatory and retaliatory conduct;

f. Awarding punitive damages against defendants JESSICA S. TISCH, STEVEN M. MAURIELLO, AMANJEET S. SANDHU, TAMECCA GREENE, MARIA I.

FRANCO, and ROSARIO E. MONTERO, in their individual capacities, to the fullest extent permitted under the NYSHRL and NYCHRL;

g. Awarding plaintiff reasonable attorneys' fees, litigation expenses, costs, and disbursements pursuant to the NYSHRL, NYCHRL, and other applicable law;

h. Awarding prejudgment and postjudgment interest to the fullest extent permitted by law;

i. Entering appropriate declaratory and injunctive relief prohibiting defendants from engaging in further discrimination, sexual harassment, hostile-work-environment conduct, retaliation, or interference with plaintiff's protected employment rights;

j. Directing defendants to remove, correct, expunge, or otherwise neutralize discriminatory, retaliatory, or improperly imposed personnel records, Command Disciplines, unfavorable evaluations, disciplinary notations, transfer restrictions, and other employment documentation resulting from the unlawful conduct alleged herein;

k. Directing defendants to restore plaintiff's employment rights, assignments, promotional opportunities, professional standing, seniority, benefits, and other terms and conditions of employment adversely affected by defendants' unlawful conduct, to the extent practicable;

l. Enjoining defendants, their agents, employees, supervisors, officers, representatives, and all persons acting in concert with them from retaliating against plaintiff for commencing, prosecuting, participating in, or supporting this action;

m. Requiring defendants to implement appropriate corrective measures, including supervisory accountability, enforcement of antidiscrimination and anti-harassment policies, and measures reasonably necessary to prevent further retaliation against plaintiff; and

n. Awarding plaintiff such other and further legal, equitable, declaratory, and injunctive relief as this Court deems just and proper.

Dated: October 21, 2026
Yonkers, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff MARIA A. DELACRUZ

THE SANDERS FIRM, P.C.
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Website: http://www.thesandersfirmpc.com

ATTORNEY VERIFICATION

STATE OF NEW YORK
ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

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

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

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

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

Dated: October 21, 2026
Yonkers, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff MARIA A. DELACRUZ

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

MARIA A. DELACRUZ

Plaintiff,

-against-

THE CITY OF NEW YORK; JESSICA S. TISCH; STEVEN M. MAURIELLO; AMANJEET S. SANDHU; TAMECCA GREENE; MARIA I. FRANCO; and ROSARIO E. MONTERO

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff MARIA A. DELACRUZ

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