SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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IEASHA WILLIAMS

Plaintiff,

-against-

THE CITY OF NEW YORK; DARCEL D. CLARK; DARLENE MARTINEZ; SEAN DILLON; and MELISSA POLANCO

Defendants

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Summons

Index No.

Jury Demand

To the above-named Defendants:

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

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

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

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

Venue is proper in Bronx County pursuant to CPLR §§ 503(a) and 504(3). A substantial part of the events and omissions giving rise to this action occurred in Bronx County, where plaintiff IEASHA WILLIAMS was employed by the Office of the Bronx County District

Attorney and where the challenged employment practices occurred. CPLR § 503(a) permits venue where a substantial part of the events or omissions giving rise to the claim occurred, while CPLR § 504(3) places an action against the City of New York in the county within the City where the cause of action arose.

Beginning in or about December 2022, plaintiff made internal EEO complaints concerning workplace sexual harassment. On September 12, 2023, the Office substantiated plaintiff's complaints against Jeffrey Bolden and Oral Clarke. Plaintiff thereafter remained employed by the Office and was promoted to Trial Preparation Assistant Supervisor in November 2024.

On July 24, 2025, defendants opened an official Human Resources investigation concerning alleged workplace conditions within the Discovery Compliance Bureau and simultaneously withheld plaintiff's professional-staff bonus. Plaintiff alleges that, although the bureau had eight supervisors, the three supervisors selected as respondents and subjected to the investigation and corresponding compensation consequences were plaintiff, Seyi Jemmott-Collins, and Latasha Summers, all of whom are Black women.

Plaintiff further alleges that defendants allowed the investigation to continue for more than one year without providing a final written determination, withheld two professional-staff bonuses while the investigation remained pending, subjected her to heightened scrutiny concerning her supervisory conduct and attendance, and continued to treat her adversely after her prior protected EEO activity. Although plaintiff's withheld bonuses were eventually released, defendants did not provide her with a written disposition explaining the outcome of the investigation.

This action seeks relief under the New York State Human Rights Law and the New York City Human Rights Law for race discrimination, disparate treatment, retaliation for protected activity, and related discriminatory and retaliatory employment practices.

Dated: October 7, 2026
Yonkers, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff IEASHA WILLIAMS

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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

DARCEL D. CLARK, DARLENE MARTINEZ, SEAN DILLON, and MELISSA POLANCO
c/o Office of the Bronx County District Attorney
198 East 161st Street
Bronx, New York 10451

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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IEASHA WILLIAMS

Plaintiff,

-against-

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Verified Complaint

Index No.

Jury Demand

Plaintiff IEASHA WILLIAMS, by her attorney THE SANDERS FIRM, P.C., complaining of defendants THE CITY OF NEW YORK; DARCEL D. CLARK; DARLENE MARTINEZ; SEAN DILLON; and MELISSA POLANCO, alleges as follows:

INTRODUCTION

Plaintiff IEASHA WILLIAMS brings this action arising from discriminatory and retaliatory treatment by the CITY OF NEW YORK and officials within the Office of the Bronx County District Attorney after she engaged in protected EEO activity and obtained substantiated findings of workplace sexual harassment.

Williams had worked for the Office since 2020 without a history of discipline, attendance violations, or Human Resources investigations. After her EEO complaints against Jeffrey Bolden and Oral Clarke were substantiated in September 2023, however, neither respondent was meaningfully separated from her. Clarke remained within the Discovery Compliance Bureau ("DCB"), and Williams was ultimately required to alter her own movements and interactions in order to avoid him.

The Office nevertheless promoted Williams to Trial Preparation Assistant Supervisor in November 2024. When she returned from maternity leave in March 2025 and began actually performing the role, she was expected to review employee work, enforce discovery compliance, document performance deficiencies, and hold employees accountable. She was also encouraged through the Office's own leadership training to promote accountability, improve workplace culture, and bring ideas forward to executive leadership.

Within approximately four months of returning, Human Resources opened an investigation concerning leadership and an alleged toxic work environment within DCB and immediately withheld Williams's professional-staff compensation. Although DCB had approximately eight supervisors, the three supervisors Williams understood to have been designated as respondents and subjected to corresponding compensation consequences were Williams, Seyi Jemmott-Collins, and Latasha Summers—all Black women.

The investigation then remained unresolved for more than one year. During that period, two of Williams's professional-staff bonuses were withheld, her supervisory decisions and communications were repeatedly scrutinized, and she was characterized through subjective terms including "loud," "boisterous," "intimidating," "cold," "off-putting," and speaking as though she was "out in the street." Human Resources itself acknowledged that some of those descriptions carried particular implications when applied to Black women.

The investigation also exposed a direct connection between Williams's prior protected EEO activity and the scrutiny of her supervisory placement. During the December 29, 2025 investigatory interview, Chief Human Resources Officer DARLENE MARTINEZ acknowledged that Williams had been the complainant, Clarke had been the respondent, and the complaint had been substantiated. MARTINEZ further acknowledged that Williams effectively

occupied a supervisory position over Clarke, characterized that arrangement as "quite ridiculous," and identified Clarke's continued discussion of the EEO matter as retaliation.

Yet during the same meeting, MARTINEZ questioned whether Williams should ever have been made a supervisor in DCB because Williams purportedly had "too many issues with individuals in that location." Those "issues" included circumstances defendants themselves had created by leaving Clarke in DCB after Williams successfully complained of sexual harassment and later promoting Williams into a supervisory structure that failed to resolve that conflict.

Williams continued working, completed her supervisory probation, continued supervising employees, and was never informed that she had committed misconduct or violated an Office policy. Although her withheld bonuses were eventually released in 2026, defendants still failed to provide her with a written disposition explaining whether the investigation had been substantiated, unsubstantiated, or otherwise resolved.

Williams alleges that defendants subjected her to materially different treatment because of her race and in retaliation for protected EEO activity, including through selective investigation, prolonged economic consequences, heightened scrutiny, racialized characterizations of her supervisory conduct, and the use of circumstances arising from her substantiated EEO complaints to question her suitability for advancement within DCB.

This action seeks relief under the New York State Human Rights Law and the New York City Human Rights Law for race discrimination, disparate treatment, retaliation, and related discriminatory and retaliatory employment practices.

JURISDICTION AND VENUE

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

2. Plaintiff asserts causes of action arising under the New York State Human Rights Law, Executive Law § 296, et seq., and the New York City Human Rights Law, New York City Administrative Code § 8-107, et seq., and seeks legal and equitable relief within this Court's general jurisdiction.

3. Venue is proper in Bronx County pursuant to CPLR §§ 503(a) and 504(3) because a substantial part of the events and omissions giving rise to plaintiff's claims occurred in Bronx County, where plaintiff was employed by the Office of the Bronx County District Attorney and where the challenged employment practices occurred.

4. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York and is subject to suit in this Court.

PROCEDURAL REQUIREMENTS

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

6. This action is timely commenced. The discriminatory and retaliatory conduct alleged herein occurred beginning in 2025 and continued through at least 2026, including the continuation of the Human Resources investigation, the withholding of plaintiff's professional-staff bonuses, and the ongoing scrutiny of plaintiff's employment. Plaintiff's claims therefore fall within the applicable limitations' periods governing claims under the New York State Human Rights Law and the New York City Human Rights Law. New York City Administrative Code § 8-502(d) provides a three-year limitations period for civil actions brought under the NYCHRL.

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

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

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

10. This action is timely commenced. Plaintiff's allegations include sexual harassment and protected EEO activity occurring in 2022 and 2023, substantiated EEO determinations issued on September 12, 2023, and continuing discriminatory, hostile, and retaliatory employment conduct occurring throughout 2025 and 2026. Plaintiff's claims are therefore timely under the applicable limitations' periods governing claims under the New York State Human Rights Law and the New York City Human Rights Law. New York City Administrative Code § 8-502(d) provides a three-year limitations period for civil actions brought under the NYCHRL.

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

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

PLAINTIFF

13. Plaintiff IEASHA WILLIAMS is a natural person employed by the Office of the Bronx County District Attorney.

14. Plaintiff began her employment with the Office of the Bronx County District Attorney on March 9, 2020, in the Discovery Compliance Bureau, where she developed substantial experience with discovery operations and the bureau's internal procedures.

15. Before the events giving rise to this action, plaintiff had no history of disciplinary problems, attendance violations, or Human Resources investigations.

16. Beginning in or about December 2022, plaintiff made internal EEO complaints concerning workplace sexual harassment by Jeffrey Bolden and Oral Clarke. On September 12, 2023, both complaints were substantiated.

17. In November 2024, plaintiff was promoted to Trial Preparation Assistant Supervisor within the Discovery Compliance Bureau. She commenced maternity leave shortly thereafter and returned to work on March 26, 2025, when she began performing the day-to-day responsibilities of her supervisory position.

18. As a supervisor, plaintiff was responsible for reviewing employee work, monitoring discovery compliance, identifying and correcting deficiencies, documenting

performance issues, and helping ensure compliance with the Office's obligations under CPL Article 245.

19. On July 24, 2025, plaintiff was notified that Human Resources had opened an official investigation concerning allegations involving leadership within the Discovery Compliance Bureau and that her professional-staff bonus would be withheld pending the investigation.

20. Plaintiff alleges that, although the bureau had approximately eight supervisors, the three supervisors designated as respondents and subjected to the investigation and corresponding compensation consequences were plaintiff, Seyi Jemmott-Collins, and Latasha Summers, all of whom are Black women.

21. Plaintiff continued performing her duties throughout the investigation, completed her supervisory probation, and remained employed while defendants continued the investigation for more than one year without providing her with a written final disposition. Plaintiff alleges that the resulting scrutiny, withholding of compensation, and continuing treatment were discriminatory and retaliatory in violation of the New York State Human Rights Law and the New York City Human Rights Law.

DEFENDANTS

22. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York. At all relevant times, the CITY OF NEW YORK was plaintiff's employer and acted through the Office of the Bronx County District Attorney, its executives, Human Resources personnel, managers, supervisors, and other employees responsible for the terms and conditions of plaintiff's employment.

23. At all relevant times, defendant DARCEL D. CLARK was the District Attorney of Bronx County and the executive head of the Office of the Bronx County District Attorney. In that capacity, CLARK exercised executive authority over the administration and operation of the Office and the personnel employed therein. Plaintiff alleges that the discriminatory and retaliatory employment practices challenged herein occurred within the Office under CLARK's administration. Plaintiff sues CLARK in her individual and official capacities to the extent the evidence establishes her personal participation in, authorization, approval, or condonation of the unlawful employment practices alleged herein.

24. At all relevant times, defendant DARLENE MARTINEZ was the Chief Human Resources Officer of the Office of the Bronx County District Attorney. MARTINEZ exercised substantial authority over Human Resources matters affecting plaintiff, including investigations, discipline, compensation, transfers, reassignment, promotions, and employee reporting relationships. Plaintiff alleges that MARTINEZ directly participated in the investigation of plaintiff, the continued withholding and eventual release of plaintiff's professional-staff bonuses, and the continuing scrutiny of plaintiff's employment.

25. MARTINEZ personally participated in plaintiff's December 29, 2025 investigatory interview. During that meeting, MARTINEZ acknowledged that plaintiff had been the complainant in a substantiated EEO matter involving Oral Clarke, that Clarke had been the respondent, and that subsequent conduct attributed to Clarke constituted retaliation. MARTINEZ further acknowledged that plaintiff had effectively been placed in a supervisory relationship involving Clarke and characterized that arrangement as "quite ridiculous."

26. During the same meeting, MARTINEZ questioned whether plaintiff should have been permitted to supervise within the Discovery Compliance Bureau because plaintiff

purportedly had "too many issues with individuals in that location." Plaintiff alleges that MARTINEZ thereby treated circumstances arising from plaintiff's prior substantiated EEO activity and the Office's own handling of that activity as considerations bearing adversely upon plaintiff's suitability and success as a supervisor.

27. MARTINEZ thereafter continued to administer and communicate concerning the investigation despite the absence of any communicated final finding that plaintiff had engaged in misconduct or violated Office policy. Plaintiff further alleges that MARTINEZ possessed authority concerning the release of plaintiff's withheld professional-staff bonuses and ultimately authorized their release in 2026.

28. Plaintiff sues MARTINEZ in her individual and official capacities based upon her direct participation in, administration of, authorization of, and failure to correct the discriminatory and retaliatory employment practices alleged herein.

29. At all relevant times, defendant SEAN DILLON was the Director of Labor Relations & Discipline for the Office of the Bronx County District Attorney. On July 24, 2025, DILLON personally notified plaintiff that Human Resources had opened an official investigation into allegations against her and informed plaintiff that her summer professional-staff bonus would be withheld for up to ninety days pending determination of the investigation.

30. After the stated ninety-day period expired, DILLON continued to communicate that the investigation remained ongoing while plaintiff's compensation remained withheld and no final determination had been issued. Plaintiff alleges that DILLON participated in the administration and continuation of the investigation and in communications concerning the withholding of plaintiff's compensation.

31. DILLON also participated in subsequent employment-related proceedings involving plaintiff's supervisory conduct, including proceedings concerning the performance-evaluation appeal of an employee whom plaintiff supervised. Plaintiff alleges that conduct and communications involving plaintiff continued to be examined while the original Human Resources investigation remained unresolved.

32. Plaintiff sues DILLON in his individual and official capacities based upon his direct participation in the investigation, the withholding and continued withholding of compensation, and the employment-related scrutiny alleged herein.

33. At all relevant times, defendant MELISSA POLANCO was a Human Resources official employed by the Office of the Bronx County District Attorney. POLANCO participated with MARTINEZ and DILLON in Human Resources matters concerning plaintiff and was among the Human Resources personnel involved in the investigation of plaintiff.

34. POLANCO was present with MARTINEZ during plaintiff's December 29, 2025 investigatory interview and was included in subsequent communications concerning the status and continuation of the investigation and plaintiff's withheld professional-staff bonuses.

35. Plaintiff alleges that POLANCO participated in the administration, review, continuation, and handling of the investigation and related employment actions affecting plaintiff. Plaintiff sues POLANCO in her individual and official capacities based upon her personal participation in the discriminatory and retaliatory employment practices alleged herein.

36. Plaintiff alleges that defendants MARTINEZ, DILLON, and POLANCO were among the Human Resources officials involved in the investigation from its outset. Plaintiff further alleges that, although the Discovery Compliance Bureau had approximately eight supervisors, the three supervisors designated as respondents and subjected to the investigation

and corresponding compensation consequences were plaintiff, Seyi Jemmott-Collins, and Latasha Summers, all of whom are Black women.

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

BACKGROUND

Plaintiff's Employment History and Substantiated EEO Complaints

38. Plaintiff began working for the Office of the Bronx County District Attorney on March 9, 2020, in the Discovery Compliance Bureau ("DCB").

39. When plaintiff joined DCB, she was not a supervisor. Over time, she learned the Office's discovery operations, became familiar with how the bureau functioned, assumed increasing responsibility, and developed substantial institutional knowledge concerning DCB's work.

40. Before the events giving rise to this action, plaintiff did not have a history of disciplinary problems, attendance violations, written reprimands, or Human Resources investigations.

41. Plaintiff came to work, performed her duties, and continued advancing within the bureau.

42. That history is significant because the investigation, attendance scrutiny, and continuing Human Resources attention that later surrounded plaintiff represented a marked departure from the manner in which she had previously been treated during her employment.

43. Beginning in or about December 2022, plaintiff made separate internal EEO complaints concerning workplace conduct by Jeffrey Bolden and Oral Clarke.

44. Plaintiff's complaints included witnesses, documentation, communications, and information concerning conduct she believed constituted sexual harassment.

45. Among the conduct identified in plaintiff's complaint materials was the use of the phrase "baby mama," together with other comments, communications, and workplace behavior that caused plaintiff to become sufficiently uncomfortable that she believed formal EEO intervention was necessary.

46. Plaintiff did not initiate the EEO process because she wanted conflict within the workplace. She wanted to continue working and performing her duties, but believed the conduct had reached a point where it needed to be formally addressed.

47. The EEO process continued through 2023.

48. On September 12, 2023, EEO Officer Kim Hernandez issued separate determination letters concerning plaintiff's complaints against Bolden and Clarke.

49. Both sexual-harassment complaints were substantiated.

50. The determination letters also expressly addressed retaliation and advised that retaliation or harassment against an employee for filing an EEO complaint, opposing discrimination, seeking an accommodation, or cooperating in an investigation violated EEO policy and could constitute grounds for disciplinary action.

51. The Office therefore had actual knowledge not only that plaintiff had engaged in protected EEO activity, but that the complaints underlying that protected activity had been investigated and substantiated.

52. Plaintiff reasonably believed that, after the Office substantiated both complaints, she would be able to put the experience behind her and continue working without remaining exposed to the same individuals and circumstances that had led her to seek EEO intervention.

53. That did not occur.

The Office Failed to Meaningfully Separate Plaintiff from The Respondents

54. After the September 12, 2023 determinations, both Bolden and Clarke remained employed.

55. Plaintiff continued working in the same environment as both individuals despite the substantiated findings.

56. At that time, Kim Hernandez had conducted both EEO investigations, and plaintiff understood that EEO personnel also included Lisa McNear.

57. Plaintiff understood that both Bolden and Clarke received the substantiated determinations.

58. Plaintiff does not presently know who made the ultimate decisions concerning what corrective or remedial action, if any, would be taken after the findings, who decided that Clarke would remain in DCB, or who decided that Bolden would remain in his existing work location.

59. Plaintiff understood, however, that EEO and Human Resources possessed authority concerning the response to substantiated EEO findings and that communications occurred between EEO and DCB management concerning the matters.

60. Notwithstanding that institutional knowledge, plaintiff was not meaningfully separated from either respondent.

61. Bolden remained on the same floor as plaintiff at the Office's then-existing location at 260 East 161st Street.

62. Plaintiff worked from a room while Bolden worked from a cubicle located near the entrance to the work area, in front of the Director of Interpreting Services and to the right of plaintiff's Chief's office.

63. Because of that location, plaintiff could not realistically avoid passing Bolden during the ordinary course of her workday.

64. Plaintiff had to pass his work area when entering and leaving, using the restroom, and meeting with her Chief.

65. Plaintiff therefore continued encountering Bolden in the workplace after the Office had substantiated her sexual-harassment complaint against him.

66. To plaintiff's knowledge, no meaningful measure was implemented to separate her from Bolden.

67. Bolden was later separated from employment sometime in or about 2024, but plaintiff understands that his separation was unrelated to her substantiated EEO complaint.

68. Clarke likewise remained employed and remained assigned to DCB after plaintiff's complaint against him was substantiated.

69. Plaintiff does not recall being offered a transfer or being meaningfully consulted concerning whether she should be separated from Clarke.

70. Plaintiff later became aware that transferring Clarke was discussed, including during bureau discussions in or about April 2025.

71. Plaintiff understood from those discussions that Clarke wanted to leave DCB but that there was difficulty identifying another placement for him.

72. The result was that plaintiff remained in the same bureau as Clarke notwithstanding the substantiated sexual-harassment finding.

73. Instead of defendants creating effective separation between plaintiff and the individuals whose conduct had been substantiated, plaintiff found herself changing how she moved through the workplace.

74. Plaintiff avoided certain areas, minimized unnecessary interactions, and attempted to create distance for herself because she did not want to be placed in uncomfortable situations involving the respondents.

75. That distinction is important. Plaintiff was the employee whose complaints had been substantiated, yet she experienced the practical burden of managing the continuing workplace consequences of the harassment.

Plaintiff Raised Concerns About the Handling of Confidential EEO Information

76. Plaintiff also became concerned about the confidentiality of her EEO matters.

77. Plaintiff did not disclose the substance of her EEO complaints throughout the Office and did not want her personal EEO matters to become the subject of workplace gossip.

78. Over time, however, plaintiff observed that employees appeared to possess information concerning the matters that plaintiff had never shared with them.

79. Some of those employees had been hired after the underlying events occurred, including employees hired into the bureau during 2023 and 2024.

80. That circumstance caused plaintiff to question how information concerning confidential EEO matters had become known to employees who had not been involved in the underlying events or investigations.

81. Plaintiff ultimately raised those concerns with Lisa McNear and Michael Chen in EEO.

82. Those concerns contributed to plaintiff becoming increasingly guarded about what personal information she shared within the Office and whom she trusted with information concerning her employment.

83. These events preceded the later Human Resources investigation and are important to understanding plaintiff's subsequent concerns regarding confidentiality, retaliation, and the manner in which information concerning her employment was being handled within the Office.

Plaintiff Was Promoted After Her Substantiated EEO Complaints

84. In November 2024, plaintiff was promoted to Trial Preparation Assistant Supervisor within DCB.

85. Plaintiff had not applied the first two times the supervisory position became available. When she eventually applied, she was selected along with three other supervisors.

86. Plaintiff was interviewed by Bureau Chief Seyi Jemmott-Collins, Deputy Bureau Chief Honey Cohen, and Robert Spencer.

87. Plaintiff understood that DCB leadership selected her for the position, although she does not presently know who provided final approval for the promotion or who made the ultimate decision that she would remain within DCB as a supervisor.

88. Defendant DARLENE MARTINEZ was not part of plaintiff's interview panel, and plaintiff does not know what role, if any, Human Resources played in the formal approval process.

89. Plaintiff's promotion occurred after the Office had already substantiated both of her sexual-harassment complaints.

90. The promotion is therefore significant because the Office itself determined, after plaintiff's protected EEO activity and the substantiated findings, that plaintiff was qualified to assume supervisory responsibility within DCB.

91. Plaintiff's later treatment cannot reasonably be understood as the continuation of a longstanding concern that she was unqualified, incapable of supervising, or otherwise unsuitable for advancement.

92. To the contrary, the Office promoted plaintiff after years of successful employment and after the very EEO activity that later became intertwined with the circumstances of her supervisory position.

The Office Created a Supervisory Structure Without Resolving The Clarke Problem

93. Plaintiff understood that Jemmott-Collins was responsible for determining which professional staff employees fell within the authority of DCB supervisors.

94. Plaintiff was not provided with a formal organizational chart assigning individual professional staff employees to particular supervisors.

95. Work distribution was reflected in a Teams spreadsheet, and the Office also maintained a professional manual, but plaintiff was never provided with a document specifically assigning Oral Clarke to her supervision.

96. No supervisor or Human Resources official ever informed plaintiff that Clarke was specifically assigned to her.

97. In actual practice, plaintiff and Clarke did not work together.

98. Plaintiff did not review Clarke's work, Clarke did not submit his daily logs to plaintiff, they did not regularly communicate, and plaintiff was not included on work-related email communications involving him.

99. Nevertheless, because plaintiff was a professional staff supervisor within DCB and Clarke remained a professional staff employee in the same bureau, plaintiff occupied a position in which she could exercise supervisory authority over him.

100. That distinction later became critical during plaintiff's December 29, 2025 Human Resources interview, when MARTINEZ acknowledged that plaintiff's position within DCB meant that plaintiff effectively supervised Clarke.

101. The resulting supervisory conflict was not created by plaintiff.

102. Plaintiff did not decide that Clarke would remain in DCB after her complaint against him was substantiated.

103. Plaintiff did not create the supervisory structure.

104. Plaintiff did not determine which employees would remain within DCB or how reporting relationships would be organized.

105. DCB leadership, Human Resources, and EEO personnel were aware of plaintiff's substantiated complaint against Clarke.

106. Among the individual's plaintiff understood to have knowledge of the substantiated complaint were Gina Mignola, Julian O'Connor, Lisa McNear, Michael Chen, Kim Hernandez, and Odalys Alonso.

107. Yet plaintiff was promoted into a supervisory structure in the same bureau without the Office first resolving the continued presence of the individual against whom her sexual-harassment complaint had been substantiated.

108. That institutional decision later became particularly significant when Human Resources questioned whether plaintiff should have been supervising within DCB because of the number of "issues" she purportedly had with employees in that location.

109. Plaintiff alleges that the Office could not fairly treat as a deficiency in her supervisory placement a conflict that resulted from the Office's own decision to leave Clarke within DCB after substantiating plaintiff's complaint.

Plaintiff's Promotion Immediately Preceded Her Maternity Leave

110. Plaintiff was formally promoted on Friday, November 15, 2024.

111. She commenced maternity leave on Monday, November 18, 2024, when she gave birth.

112. Although plaintiff therefore held the supervisory title beginning in November 2024, she had virtually no opportunity to perform the day-to-day functions of the position before commencing maternity leave.

113. Plaintiff returned to work on March 26, 2025.

114. Her practical experience as a supervisor therefore began only upon her return.

115. This timing is important because, when Human Resources opened the investigation in July 2025, plaintiff had been actively functioning as a supervisor for only approximately four months.

116. She was not a longstanding manager whose supervisory practices had generated years of documented complaints.

117. She was a recently promoted supervisor who had only recently returned from maternity leave and was still learning how to perform a role the Office had selected her to undertake.

Plaintiff Returned from Maternity Leave and Performed the Duties Assigned to Her

118. When plaintiff returned on March 26, 2025, her immediate supervisors were Bureau Chief Seyi Jemmott-Collins and Deputy Bureau Chief Honey Cohen.

119. Julian O'Connor served as Division Chief, Gina Mignola served as Deputy Division Chief, and Joel Wright also participated in DCB's legal supervision.

120. Plaintiff reported employee issues and matters requiring escalation through that supervisory structure, including to Jemmott-Collins, Cohen, and Wright.

121. Plaintiff did not independently determine the structure of DCB, employee transfers, or significant changes in employee workload.

122. Those decisions were made above her within DCB management.

123. Plaintiff's responsibility was to perform the supervisory functions delegated to her.

124. Those responsibilities included reviewing the work of employees whose files required supervisory review, reviewing recently trained employees, examining daily logs, checking work for accuracy, ensuring required discovery materials were present or requested, following up when materials were missing, and directing corrections when deficiencies were identified.

125. Those reviews were not inherently disciplinary.

126. They served an operational purpose: ensuring that discovery work was complete, accurate, and compliant with the Office's obligations under CPL Article 245.

127. Plaintiff was also instructed to document employee performance and conduct issues.

128. Plaintiff recalls being advised by Jemmott-Collins that documentation needed to be prepared in the manner required by MARTINEZ and Human Resources when employee problems had to be addressed.

129. Plaintiff therefore did not create her own system of monitoring, reviewing, correcting, or documenting subordinates.

130. She performed the functions management assigned to her and followed the documentation practices management told her were required.

131. This became significant when the same supervisory conduct later became part of the criticism directed at plaintiff.

132. Plaintiff was later characterized as "stern," "intimidating," and part of an alleged toxic leadership environment for conduct that included reviewing work, identifying deficiencies, correcting employees, following up on incomplete assignments, and documenting performance concerns.

133. Plaintiff alleges that defendants cannot separate their later assessment of her supervisory style from the responsibilities they themselves directed her to perform.

Plaintiff Was Required to Modify Her Conduct Around Clarke After Returning from Maternity Leave

134. Plaintiff's return from maternity leave also required her to continue navigating the unresolved consequences of her substantiated EEO complaint against Clarke.

135. Although plaintiff and Clarke did not normally work together, Clarke remained physically and organizationally within DCB.

136. Shortly after plaintiff returned, Jemmott-Collins instructed plaintiff that she needed to avoid contact with Clarke.

137. Plaintiff was instructed that, during general meetings, she should remain on the opposite side of the room from Clarke.

138. She was also instructed to avoid walking through the corridor where Clarke worked.

139. Jemmott-Collins advised plaintiff that those directions had originated with MARTINEZ.

140. The practical effect was that plaintiff returned from maternity leave as a newly promoted supervisor while simultaneously being required to alter where she stood, where she walked, and how she moved through the workplace because the respondent in her substantiated sexual-harassment complaint remained assigned to the same bureau.

141. Plaintiff was therefore required to manage the consequences of the Office's failure to create meaningful separation even as she was expected to establish herself as a supervisor.

142. Plaintiff later raised those instructions during her December 29, 2025 meeting with MARTINEZ.

143. During that meeting, MARTINEZ asked plaintiff who had instructed her to avoid Clarke.

144. Plaintiff responded that she did not recall.

145. Plaintiff's response did not mean that she lacked any recollection of receiving the instruction.

146. Plaintiff was confused by the question because her understanding was that MARTINEZ herself had directed Jemmott-Collins to instruct plaintiff to avoid Clarke.

147. MARTINEZ thereafter acknowledged the seriousness of the situation, stated that it should never have occurred, and indicated that people needed to be held accountable.

148. That exchange is significant because Human Resources ultimately recognized that the arrangement was improper, yet the burden of accommodating that arrangement had previously been placed upon plaintiff.

149. Plaintiff alleges that the Office's handling of Clarke placed her in a double bind: she was required to function as a supervisor within DCB while simultaneously limiting her own movements and interactions because of a substantiated complaint the Office had failed to meaningfully remedy.

150. Those circumstances later became intertwined with Human Resources' assessment of whether plaintiff should have been supervising within DCB at all.

Plaintiff Continued to Experience Concerns About the Handling of Her Information

151. Plaintiff also remained concerned about the manner in which personal employment information circulated within the Office.

152. Before plaintiff's promotion had been formally reflected in the Office directory, employees began congratulating her even though plaintiff had not personally informed them of the promotion.

153. Plaintiff later raised that issue with Human Resources.

154. Standing alone, the circulation of information concerning a promotion might not have been significant.

155. For plaintiff, however, it reinforced concerns that had already developed after employees appeared to know information concerning her confidential EEO matters that she had not personally disclosed.

156. Plaintiff therefore entered her new supervisory role with an existing concern that information involving her employment and prior EEO activity was circulating beyond the individuals to whom she had provided it.

Plaintiff Was Required to Address Existing Performance and Conduct Problems Within DCB

157. Shortly after plaintiff returned from maternity leave in March 2025, DCB management was already addressing significant performance, attendance, conduct, and professionalism concerns involving approximately six employees.

158. Those concerns were sufficiently serious that management discussed whether some of those employees might need to transition out of DCB.

159. Plaintiff did not create those concerns.

160. They existed at the bureau-management level while plaintiff was still learning how to function in her newly assumed supervisory position.

161. Some of the same employees whose performance or conduct had been discussed by management later became associated with complaints to Human Resources concerning DCB leadership and the culture of the bureau.

162. That chronology matters because the later complaints about management did not arise in a vacuum.

163. Plaintiff was supervising employees whose work, attendance, performance, or conduct had already generated concern within DCB.

164. Plaintiff's role required her to review work, identify deficiencies, follow up on missing discovery, address incomplete assignments, and document problems when employees failed to comply with expectations.

165. These duties were not self-appointed.

166. Plaintiff's Bureau Chief and Deputy Bureau Chief directed the work plaintiff was responsible for overseeing and determined when employee assignments or workloads required supervisory intervention.

167. Plaintiff reported employee issues through the legal supervisory structure, including to Seyi Jemmott-Collins, Honey Cohen, and Joel Wright.

168. Plaintiff was also specifically instructed to document employee issues in the manner Human Resources required.

169. Plaintiff recalls Jemmott-Collins advising her that documentation had to be prepared in the manner MARTINEZ wanted and in the format Human Resources needed "in order to get these people out."

170. Plaintiff therefore understood that documenting employee deficiencies was not merely permitted; it was expected as part of her supervisory responsibilities.

171. When plaintiff reviewed logs, corrected discovery deficiencies, followed up on incomplete work, documented recurring problems, or reminded employees of missed materials, she was carrying out responsibilities that had been delegated to her.

172. Plaintiff's responsibility was particularly important because DCB's work implicated the Office's discovery obligations under CPL Article 245.

173. Plaintiff was expected to ensure that required material was identified, requested when necessary, produced when required, and corrected when deficiencies were discovered.

174. These facts became significant when plaintiff was later criticized as "too stern" and when her supervisory approach became part of the allegations that she contributed to a toxic work environment.

175. Plaintiff alleges that the later assessment of her conduct cannot fairly be separated from the fact that she was being required by management to hold employees accountable for work that directly affected the Office's legal discovery obligations.

Plaintiff Was Simultaneously Required to Navigate the Continued Presence of Clarke

176. During the same period, Oral Clarke remained assigned to DCB.

177. There were occasions when Clarke's employment or potential transfer was discussed at the bureau level and plaintiff was required to leave the room because of her prior substantiated EEO complaint involving him.

178. Plaintiff understood that Clarke wanted to leave DCB but that difficulty existed in finding another placement for him.

179. Plaintiff does not know who participated in every discussion concerning Clarke, which alternatives were considered, or who possessed final authority to transfer or reassign him.

180. What plaintiff does know is that she remained the employee required to accommodate the unresolved situation.

181. Plaintiff and Clarke did not have a normal working relationship. They did not speak, plaintiff did not review his work, Clarke did not submit daily logs to plaintiff, and plaintiff was not regularly included on work-related communications involving him.

182. Nevertheless, both remained physically and organizationally within DCB.

183. Plaintiff was therefore simultaneously expected to establish herself as a new supervisor, address employee performance problems, enforce discovery-related requirements, and navigate the continuing presence of the respondent in her own substantiated sexual-harassment complaint.

184. That context became particularly important when Human Resources later treated plaintiff as part of an alleged leadership problem within the same bureau.

Plaintiff Took the Office's Leadership Training Seriously and Attempted to Improve Workplace Culture

185. In the spring of 2025, the Office provided plaintiff and other supervisors with approximately seven hours of "Trust & Inspire" leadership training.

186. The training emphasized leadership, trust, accountability, influence, workplace culture, and organizational change.

187. Supervisors were encouraged to think critically, identify problems, develop solutions, and bring ideas forward through the Office's leadership structure.

188. Plaintiff took those directives seriously.

189. During the training, plaintiff discussed her ideas concerning workplace culture and supervision with one of the instructors and was encouraged to present those ideas to Chief Assistant District Attorney Derek Lynton.

190. On May 16, 2025, plaintiff emailed Lynton and Justin Demsey with a proposal entitled "Annual Trust & Inspire Training + Cultural Alignment Strategy."

191. Plaintiff's proposal was not a generalized complaint about the Office.

192. She reviewed the professional staff manual, examined policies used by other City agencies, considered how the Office defined productivity and professionalism, and identified areas where she believed the existing supervisory framework required clarification or modernization.

193. One provision of the Office manual expressly stated that supervisory staff were responsible for ensuring that employees complied with Office policies, procedures, and rules of conduct.

194. Plaintiff viewed that provision as directly relevant to her own role because she was being required to supervise employees and enforce standards on a daily basis.

195. Plaintiff also identified a structural problem: the professional staff manual had not been updated since 2018 even though the legal and operational environment in which DCB functioned had materially changed.

196. By that time, discovery practice had changed significantly, including changes associated with CPL Article 245, and plaintiff believed supervisors were being asked to enforce expectations through guidance that no longer fully reflected the work they were actually performing.

197. Plaintiff therefore questioned how frontline supervisors were expected to enforce standards consistently where the structure governing those expectations was outdated, incomplete, or inconsistently applied.

198. Plaintiff proposed solutions rather than merely identifying problems.

199. Her recommendations included annual Trust & Inspire training, clearer definitions of professionalism and productivity, greater accountability, improved onboarding, stronger retention practices, and more consistent development of workplace culture.

200. Plaintiff also proposed basic productivity principles involving effective time management, consistent output, and performance success.

201. Plaintiff's proposals demonstrate that, during the period immediately preceding the investigation, she was actively attempting to improve workplace culture rather than undermine it.

Executive Leadership Encouraged Plaintiff's Efforts

202. On May 21, 2025, Lynton responded directly to plaintiff.

203. Lynton thanked plaintiff for what he described as her "insightful email."

204. He explained that Trust & Inspire was intended to promote "office-wide culture change" and that leadership had intentionally been trained first because "everything rises and falls with our leaders."

205. Lynton further told plaintiff that he was pleased she had begun conversations and was exploring ways in which she could "inspire" her bureau and staff.

206. He expressed confidence that plaintiff's positive example could influence others.

207. Plaintiff responded professionally, thanked him for his consideration, and advised that she would be interested in contributing further if opportunities arose.

208. This exchange is significant because executive leadership was affirmatively encouraging plaintiff's participation in culture change in May 2025.

209. At that time, plaintiff was being told that leadership required initiative, accountability, responsibility, and the willingness to identify problems and propose solutions.

210. Plaintiff acted consistently with that message.

211. She studied the existing policies, identified structural concerns, proposed reforms, and sought guidance from executives who possessed the authority to address those issues.

212. Approximately two months later, plaintiff was informed that she was herself a respondent in an investigation concerning leadership and the alleged culture within DCB.

213. The contrast is substantial.

214. In May 2025, executive leadership praised plaintiff for engaging with precisely the issues of leadership, accountability, and workplace culture that the Office had instructed supervisors to address.

215. By July 2025, plaintiff was being treated as part of an alleged leadership problem concerning that same workplace culture.

Plaintiff Was Investigated After Only A Few Months of Actual Supervisory Experience

216. The timing is also important.

217. Plaintiff returned from maternity leave on March 26, 2025.

218. Because she had been promoted only days before giving birth in November 2024, March 2025 marked the beginning of her actual day-to-day supervisory experience.

219. During the next several months, plaintiff learned the role, attended leadership training, supervised employees with existing performance and conduct concerns, researched Office policies, proposed improvements to executive leadership, and attempted to perform the accountability functions management had assigned to her.

220. By July 24, 2025, however, Human Resources had opened an investigation into plaintiff concerning allegations involving leadership and workplace culture.

221. Plaintiff had therefore been actively functioning as a supervisor for only approximately four months before being designated as a respondent.

222. Plaintiff alleges that this short period is significant because she was still learning the role and carrying out responsibilities assigned by management when those same responsibilities began to be characterized as part of an alleged toxic environment.

223. Plaintiff further alleges that defendants cannot fairly characterize her as having created or perpetuated a longstanding leadership problem when the performance and culture concerns within DCB predated her actual tenure as a working supervisor.

224. Nor can plaintiff's later treatment be divorced from the fact that some of the employees associated with complaints about management were employees whose performance, attendance, conduct, or professionalism had already required supervisory attention.

225. Plaintiff alleges that the sequence raises a substantial question whether legitimate supervisory accountability was transformed into a complaint against the supervisors enforcing it and whether that process was then applied selectively against the three Black women within DCB leadership.

Human Resources Opened an Investigation and Immediately Withheld Plaintiff's Compensation

226. On July 24, 2025, at approximately 11:26 a.m., defendant SEAN DILLON, Director of Labor Relations & Discipline, notified plaintiff by email that "HR has opened an official investigation into certain allegations levied against you."

227. DILLON did not identify the allegations against plaintiff.

228. Instead, he advised that the nature of the investigation and the specific allegations would be revealed during a meeting that Human Resources intended to schedule "in the near future."

229. In the same communication, DILLON informed plaintiff that her summer professional-staff bonus would be withheld for up to ninety days pending determination of the investigation.

230. Plaintiff therefore learned simultaneously that she was the subject of an official Human Resources investigation and that compensation otherwise payable to her would be withheld.

231. At that point, plaintiff had not been interviewed.

232. She had not been told what she had allegedly done.

233. She had not been given the identity or substance of the complaints against her.

234. She had not been found to have violated any Office policy.

235. Nevertheless, a direct financial consequence was imposed immediately.

236. Plaintiff continued reporting to work and performing her supervisory duties while the investigation and the withholding of her compensation remained pending.

237. The timing was particularly significant because plaintiff had returned from maternity leave only on March 26, 2025 and had been actively functioning in the supervisory role for approximately four months.

238. During those few months, plaintiff had attended the Office's leadership training, attempted to implement the accountability principles she had been taught, proposed workplace improvements to executive leadership, and continued learning the supervisory position.

239. She nevertheless went from being encouraged to contribute to workplace culture in May 2025 to being formally investigated concerning leadership and workplace culture in July 2025.

The Respondent Group Narrowed to The Three Black Women Supervisors

240. Plaintiff initially understood the investigation to concern the leadership and culture of DCB generally.

241. DCB's supervisory structure consisted of approximately eight individuals, including Bureau Chief Seyi Jemmott-Collins, Deputy Bureau Chief Honey Cohen, Supervising Assistant District Attorney Joel Wright, and professional staff supervisors Stephanie Bravo, Latasha Summers, Gabrielle Sfera, Claire Hripcsak, and plaintiff.

242. As the investigation developed, however, plaintiff understood that only three members of that supervisory structure were designated as respondents, required to participate in investigatory interviews, accused of contributing to an alleged toxic work environment, and subjected to compensation consequences.

243. Those three individuals were plaintiff, Seyi Jemmott-Collins, and Latasha Summers.

244. All three are Black women.

245. At the time the investigation was opened, none of the three had been disciplined for the alleged conduct.

246. Plaintiff understood that the other DCB supervisors continued receiving their professional-staff bonuses while the investigation was pending.

247. Gabrielle Sfera personally advised plaintiff that she had received her bonuses.

248. Plaintiff does not presently know who originally authorized the investigation, who received the underlying complaints, who reviewed those complaints, or who made the decision to designate plaintiff, Jemmott-Collins, and Summers as respondents.

249. Plaintiff does know that MARTINEZ, DILLON, and POLANCO were among the Human Resources personnel involved in the investigation.

250. Plaintiff does not allege that every person involved in DCB management participated in selecting the respondents, because that information remains within defendants' possession.

251. What is presently known, however, is that an investigation ostensibly concerning DCB leadership did not result in the entire supervisory structure being treated alike.

252. Instead, the three Black women supervisors were the individual's plaintiff understood to have been singled out as respondents and subjected to the corresponding compensation consequences.

253. Plaintiff alleges that this disparity requires explanation and forms part of the factual basis for her race-discrimination claims.

Human Resources Allowed the Stated Ninety-Day Period to Expire Without Interviewing Plaintiff

254. After receiving DILLON's July 24 communication, plaintiff waited for Human Resources to schedule the meeting that DILLON had represented would occur "in the near future."

255. Human Resources did not promptly do so.

256. July passed.

257. August passed.

258. September passed.

259. By October 31, 2025, the ninety-day period referenced by DILLON had expired.

260. Plaintiff still had not been interviewed regarding the allegations.

261. She still had not been told specifically what she was accused of doing.

262. She still had not received findings.

263. She still had not received a written determination.

264. Her bonus remained withheld.

265. Plaintiff was therefore required to continue supervising employees for months while Human Resources maintained an official investigation against her without first obtaining her account of the events supposedly under investigation.

266. That circumstance is significant because defendants were willing to impose and continue a financial consequence against plaintiff while delaying the basic investigative step of interviewing her.

Plaintiff Repeatedly Sought Assistance Rather Than Avoiding the Investigation

267. Plaintiff did not refuse to participate in the process or ignore the investigation.

268. On July 24, 2025, the same day DILLON notified her of the investigation, plaintiff contacted her union representative, Keisha Graham, and advised her what had occurred.

269. Plaintiff followed up again on August 6, 2025.

270. During the week of August 13, 2025, plaintiff communicated further with Graham while attempting to understand the status of the investigation.

271. On September 3, 2025, plaintiff provided Graham with copies of her prior substantiated EEO determinations and explained the history preceding the new Human Resources investigation.

272. Plaintiff continued seeking assistance on September 26, October 1, and October 7, 2025.

273. In her October 7 communication, plaintiff specifically explained that she had been the complainant—not the respondent—in the prior EEO matters and that both complaints had been substantiated.

274. She further explained that, even after those substantiated findings, she had been required to adjust her own movements in the workplace because Clarke remained within her bureau.

275. Plaintiff described feeling as though she had to "walk on eggshells" while continuing to supervise within the same environment.

276. Plaintiff raised that history because, from her perspective, the 2025 investigation could not be divorced from the Office's prior handling of her protected EEO activity.

277. By the expiration of the ninety-day period, plaintiff had repeatedly sought assistance and clarification, yet she still had no interview, no specific allegations, no findings, no written determination, and no release of her bonus.

278. These contemporaneous communications are significant because they demonstrate that plaintiff was identifying the connection between her substantiated EEO history

and her subsequent treatment while the investigation was ongoing, rather than constructing that connection only after litigation was contemplated.

Plaintiff Continued Performing the Supervisory Duties Human Resources Expected Her to Perform

279. While plaintiff remained under investigation, she continued performing the same supervisory responsibilities that management and Human Resources expected her to perform.

280. One example involved employee Mame Djigal.

281. On November 6, 2025, plaintiff sent Human Resources a detailed email entitled "Documentation of Continued Policy Violations and Supervisory Defiance – TPA Mame Djigal."

282. Plaintiff documented several workplace incidents involving Djigal, including a November 5 bureau meeting in which plaintiff attempted to restore order while another supervisor was speaking and Djigal responded publicly to plaintiff's direction.

283. Plaintiff also documented prior issues concerning discovery-folder corrections, discrepancies in work logs, and employee conduct during meetings.

284. Plaintiff referenced Office policies because she understood that her responsibility as a supervisor was to document objective workplace issues rather than personalize disputes with employees.

285. Plaintiff's November 6 communication was consistent with the instructions she had previously received from management concerning documentation.

286. Plaintiff had been directed to review employee work, ensure discovery compliance, report deficiencies, and document recurring employee issues in a form useful to Human Resources.

287. Plaintiff recalls specifically being told that MARTINEZ and Human Resources required documentation in a particular manner when employee performance problems needed to be addressed.

288. Plaintiff therefore understood the November 6 email as compliance with her supervisory responsibilities, not misconduct.

289. This distinction matters because plaintiff's documentation of employees later became part of the scrutiny directed toward her supervisory style.

290. Plaintiff alleges that defendants placed her in an untenable position: management required her to hold employees accountable and document performance deficiencies, but the resulting employee dissatisfaction could then be repackaged as evidence that plaintiff herself was part of a toxic work environment.

Finance Confirmed That Human Resources Controlled Release of Plaintiff's Bonus

291. By November 2025, plaintiff still had not received her withheld summer bonus.

292. On November 14, 2025, plaintiff contacted Chief Financial Officer Dahianna Castillo to determine why the compensation remained unpaid.

293. Castillo informed plaintiff that Finance could not release the bonus independently.

294. Castillo directed plaintiff to MARTINEZ and DILLON and explained that, in circumstances such as plaintiff's, Finance needed to hear "officially from HR first before releasing any bonuses."

295. That communication was significant because it confirmed that the continuing nonpayment of plaintiff's compensation was not merely an administrative delay within Finance.

296. Human Resources controlled whether Finance was authorized to release the payment.

297. Plaintiff therefore returned to the Human Resources officials responsible for administering the investigation.

Human Resources Continued the Withholding Beyond the Stated Ninety Days Without Explanation

298. On November 17, 2025, plaintiff emailed DILLON and expressly pointed out that the ninety-day period referenced in his July 24 communication had expired on October 31.

299. Plaintiff advised DILLON that no one had contacted her to schedule the promised investigative meeting and that she still had not been told the substance of the allegations.

300. On November 19, 2025, DILLON responded only that "this investigation remains ongoing" and that Human Resources would advise plaintiff of any material updates.

301. That response did not explain why the investigation remained open.

302. It did not explain why plaintiff still had not been interviewed.

303. It did not identify what investigative work had been completed.

304. It did not identify what investigative work remained outstanding.

305. It did not explain why plaintiff's bonus continued to be withheld after expiration of the ninety-day period.

306. Plaintiff responded again and specifically asked why her compensation remained withheld and what investigative steps were still outstanding.

307. She received no substantive answer to those questions.

308. Plaintiff does not presently know who originally authorized withholding the bonus or who made the specific decision to continue the withholding beyond the ninety-day period.

309. Plaintiff therefore does not attribute that ultimate decision to a particular individual without evidentiary support.

310. What plaintiff does know is that Finance expressly told her it required Human Resources authorization to release the bonus, that she was directed specifically to MARTINEZ and DILLON, and that DILLON confirmed the investigation remained ongoing while the payment continued to be withheld.

311. By November 2025, plaintiff was thus experiencing a continuing financial consequence from an investigation in which she still had not been interviewed about the underlying allegations.

312. Plaintiff alleges that the extended withholding of compensation, combined with the selective respondent group, the absence of findings, and the failure to promptly obtain her account of the events, materially supports her contention that the investigation was not administered neutrally.

313. Plaintiff further alleges that these events must be considered together with her prior substantiated EEO activity, her race and gender, the racial composition of the selected respondent group, and the fact that she was being scrutinized for supervisory conduct management had directed her to perform.

Human Resources Attempted to Characterize an Unconfirmed Meeting as Plaintiff's Failure to Appear

314. On December 12, 2025, Demi Hunte-Josiah sent plaintiff a meeting invitation on behalf of MARTINEZ for 2:30 p.m. that afternoon.

315. The invitation identified the subject only as "Ieasha Williams" and stated that the purpose of the meeting was to "touch base."

316. The invitation did not identify the meeting as the investigative interview plaintiff had been waiting for since July 2025.

317. It did not identify the allegations against plaintiff.

318. It did not advise plaintiff that Human Resources intended to question her as a respondent.

319. At approximately 2:36 p.m., MARTINEZ emailed plaintiff stating, "We are waiting for you for our scheduled 2:30pm meeting. Please report to HR now."

320. Plaintiff responded that neither she nor her union representative had confirmed the meeting.

321. Plaintiff had also just returned after being out sick and continued to have no clear understanding of what Human Resources intended to discuss.

322. Plaintiff advised Human Resources that she was not comfortable entering an unidentified HR meeting without union representation.

323. MARTINEZ responded only that "[w]e will discuss the nature of the matter during the meeting."

324. Plaintiff did not refuse to participate in the investigation.

325. She sought representation before participating in an investigatory interview involving allegations that had already resulted in the withholding of her compensation.

326. Local 371 thereafter confirmed plaintiff's position.

327. Terrell Tate of Local 371's Legal and Grievance Department advised MARTINEZ that "[t]he Union was not made privy to this scheduled investigation nor was it confirmed."

328. Tate requested that the investigation be rescheduled so that all necessary parties could participate.

329. Plaintiff later memorialized that she had never agreed to the December 12 meeting, had not agreed to proceed with a local delegate selected for her, and wanted outside

union representation because she was concerned that internal representation might present a conflict.

330. This episode is significant because plaintiff was already being treated as though she had failed to report to a scheduled investigative meeting when the union itself confirmed that no such meeting had been agreed upon.

331. Plaintiff alleges that the incident foreshadowed the manner in which her legitimate efforts to protect herself during the investigation were increasingly characterized as resistance or noncompliance.

Martinez Warned Plaintiff That Her Request for Representation Could Be Treated as Noncompliance

332. On December 18, 2025, plaintiff spoke by telephone with MARTINEZ concerning the scheduling of the investigative interview and plaintiff's request for union representation of her choosing.

333. Plaintiff recorded that conversation and preserved the recording.

334. During the call, plaintiff reiterated that she had not refused to participate.

335. Plaintiff explained that her concern was obtaining representation she trusted because individuals within the internal union structure appeared to be connected to persons involved on the opposing side of the matter.

336. MARTINEZ confirmed during the call that the contemplated meeting was an "investigative interview" and that plaintiff had been "named a respondent."

337. MARTINEZ also acknowledged that designation as a respondent did not mean plaintiff was guilty, would necessarily be disciplined, or that Human Resources had already credited the allegations against her.

338. Nevertheless, MARTINEZ advised plaintiff that she did not want to schedule another meeting and have plaintiff fail to appear because MARTINEZ would then interpret that conduct as plaintiff being "not willing to comply."

339. Plaintiff objected because she had not refused to participate and had not agreed to the prior meeting dates.

340. Plaintiff was attempting to ensure that she was represented before participating in the first substantive investigatory interview concerning allegations that had been pending against her for nearly five months.

341. During the conversation, plaintiff repeatedly stated that she was uncomfortable.

342. The conversation became sufficiently tense that plaintiff apologized and expressly stated that she was not attempting to be disrespectful.

343. The call ultimately ended when MARTINEZ terminated the conversation.

344. Plaintiff alleges that this interaction is significant because her effort to obtain representation was being treated as potential noncompliance before Human Resources had even substantively interviewed her about the allegations.

Plaintiff Finally Learned the Nature of The Investigation on December 29, 2025

345. On December 29, 2025, approximately five months after DILLON first advised plaintiff that Human Resources had opened an official investigation against her, plaintiff finally participated in the investigatory interview.

346. MARTINEZ and POLANCO were present for Human Resources, and Michael Simpson represented plaintiff through the union.

347. This was the first occasion on which plaintiff received a reasonably complete explanation of what she was accused of doing.

348. Human Resources explained that employees had complained about leadership within DCB and alleged that leadership had created a toxic work environment.

349. Plaintiff had been designated as one of the respondents to those allegations.

350. Individuals discussed during the meeting included Taylor Fleming, Brishae White, Naniska Donor, Janae Chestnut, Mame Djigal, and Shauntea Carr.

351. The accusations directed toward plaintiff were heavily based upon subjective descriptions of her personality, demeanor, and communication style.

352. Plaintiff was described as "loud," "boisterous," "intimidating," "cold," and "off-putting."

353. Plaintiff was also accused of speaking as though she was "out in the street."

354. MARTINEZ herself recognized the racial implications associated with some of those descriptions and discussed during the meeting that words such as "loud," "boisterous," and "intimidating" can carry particular implications when applied to Black women.

355. This acknowledgement is significant because Human Resources was not unaware of the racial dimension of the terminology being used to characterize plaintiff.

356. Rather, the Chief Human Resources Officer expressly recognized that dimension while the same descriptions remained part of the investigation of three Black women supervisors.

Plaintiff Explained That the Conduct Being Criticized Was Supervisory Conduct She Had Been Directed to Perform

357. Plaintiff explained during the meeting that many of the incidents being used to characterize her supervisory style arose directly from the responsibilities assigned to her.

358. Plaintiff reviewed employee logs because reviewing logs was part of supervision.

359. She identified discovery deficiencies because discovery errors had to be corrected.

360. She followed up on incomplete work because she was responsible for ensuring compliance.

361. She documented performance problems because management and Human Resources had instructed supervisors to document them.

362. Where workloads or assignments changed because of compliance problems, plaintiff understood those changes to have legitimate operational purposes rather than personal motivations.

363. Plaintiff therefore distinguished between an employee disliking supervision and a supervisor engaging in misconduct.

364. Plaintiff also acknowledged that she was still relatively new to supervision and that managing employees required skills different from simply knowing how to perform DCB's substantive work.

365. Plaintiff did not claim that she had nothing to learn.

366. She expressly stated that she was open to mentorship, additional training, and professional development.

367. What plaintiff disputed was the suggestion that negative perceptions concerning her tone or supervisory manner established that she had engaged in misconduct or created a toxic workplace.

368. During the meeting, plaintiff also expressed that she had begun to feel that "everything I do" could somehow be used against her.

369. Plaintiff's concern about continuing scrutiny therefore existed contemporaneously with the investigation itself.

370. It was not a characterization created only after she sought legal representation.

Martinez Acknowledged That Plaintiff Was Effectively Supervising the Respondent in Her Substantiated EEO Matter

371. The December 29 meeting also returned directly to plaintiff's prior substantiated complaint against Oral Clarke.

372. Plaintiff explained that Clarke remained within DCB after the EEO finding and that, after her promotion, she eventually occupied a position from which she could exercise supervisory authority over him.

373. MARTINEZ acknowledged that, regardless of whether Clarke technically reported directly to plaintiff, plaintiff's membership in DCB leadership and ability to review his work meant that, "So in fact, you do supervise him."

374. MARTINEZ further expressly recognized the underlying EEO history, stating to plaintiff: "You are the complainant. He was a respondent. It was substantiated."

375. Plaintiff also described Clarke continuing to discuss, mock, or comment upon the prior EEO matter.

376. MARTINEZ characterized that conduct as prohibited retaliation.

377. MARTINEZ stated: "It is an EEO violation. Okay. And it is retaliation."

378. MARTINEZ further advised plaintiff that Clarke should not be discussing the matter and that plaintiff should report the conduct to EEO.

379. Thus, the Chief Human Resources Officer expressly recognized that plaintiff remained exposed to retaliatory conduct arising from an EEO complaint the Office itself had already substantiated.

Martinez Acknowledged That the Reporting Arrangement Was Improper

380. MARTINEZ advised plaintiff that Clarke was then on extended leave and stated that, whenever he returned, "he will not be under your leadership."

381. MARTINEZ explained her position by stating, “Because I find that to be quite ridiculous.”

382. At another point in the discussion, MARTINEZ stated that she was attempting to place herself in plaintiff’s position and acknowledged that the situation “must be rough.”

383. These admissions matter because they demonstrate that Human Resources ultimately recognized the basic institutional problem plaintiff had been required to navigate.

384. Plaintiff was the complainant.

385. Clarke was the respondent.

386. The complaint had been substantiated.

387. Clarke remained in DCB.

388. Plaintiff was promoted within DCB.

389. The resulting organizational structure placed plaintiff in a position where Human Resources itself acknowledged that she effectively supervised the person against whom she had obtained a substantiated sexual-harassment finding.

390. Plaintiff did not create that arrangement.

391. She did not select Clarke’s placement.

392. She did not design the supervisory structure.

393. She did not determine that both employees should remain within DCB.

394. Those were institutional decisions.

Martinez Then Questioned Whether Plaintiff Should Ever Have Been Promoted Within DCB

395. Despite acknowledging that the Clarke arrangement was “quite ridiculous,” MARTINEZ later made a materially different observation concerning plaintiff’s own promotion.

396. MARTINEZ stated:

397. "I don't know that if HR was part of your recruitment, I would have agreed for you to be a supervisor there. I think you could be a supervisor, but not there."

398. MARTINEZ further explained that she believed plaintiff had "too many issues with individuals in that location" for plaintiff to supervise successfully and for employees to receive the support they required.

399. MARTINEZ stated that "it just was never going to work" and again observed that she did not know whether she would have agreed to plaintiff's placement as a supervisor within DCB.

400. These statements are central to plaintiff's retaliation claim.

401. Some of the most consequential "issues" plaintiff had with individuals in DCB arose directly from her prior substantiated EEO activity.

402. Plaintiff had complained about sexual harassment.

403. The complaint against Clarke had been substantiated.

404. Defendants left Clarke in DCB.

405. Defendants later promoted plaintiff within the same bureau.

406. Defendants created a structure in which plaintiff effectively possessed authority over Clarke.

407. MARTINEZ acknowledged that the resulting arrangement was inappropriate.

408. Yet MARTINEZ simultaneously relied upon plaintiff's "issues with individuals in that location" as a reason to question whether plaintiff should have been permitted to become a supervisor there.

409. Plaintiff alleges that this effectively transformed consequences arising from her protected EEO activity into a perceived defect in her own supervisory placement.

410. Put differently, plaintiff was being disadvantaged because defendants had failed to adequately resolve the workplace consequences of a substantiated complaint she had made.

411. Plaintiff did not create the conflict.

412. She reported unlawful conduct.

413. Defendants' response to that protected activity created the continuing workplace circumstances that MARTINEZ later identified as a reason plaintiff perhaps should never have supervised within DCB.

The December 29 Meeting Produced No Finding of Misconduct

414. Notwithstanding the seriousness of the investigation and the length of time it had remained pending, Human Resources did not advise plaintiff during the December 29 meeting that she had committed misconduct.

415. Plaintiff was not advised that she had violated an Office rule or policy.

416. Plaintiff understood the discussion to concern employee perceptions, supervisory development, mentorship, additional training, and broader management issues within DCB.

417. Plaintiff therefore promptly memorialized her understanding of the meeting.

418. On January 2, 2026, plaintiff emailed MARTINEZ and POLANCO and stated that she understood the December 29 meeting to have been "investigatory and non-disciplinary."

419. Plaintiff expressly memorialized her understanding that "[n]o findings or determinations were made."

420. She further stated that the issues discussed had been perception-based rather than findings of misconduct and that mentorship and additional training had been identified as appropriate support.

421. Plaintiff also memorialized that the challenges discussed during the meeting extended beyond any single individual within DCB.

422. Plaintiff made clear that she wanted to remain in DCB and continue developing as a supervisor rather than be reassigned because of circumstances she had not created.

423. Plaintiff also documented that her work reviews and supervisory assignments were directed toward discovery compliance, accuracy, and timely production and reflected practices previously performed by other supervisors before being delegated to her.

424. Plaintiff expressly stated that she did not believe she had been "set up to fail" when she was promoted and emphasized that she wanted to continue working within the bureau.

425. Plaintiff concluded by memorializing that, as of December 29, she had not been advised of findings of misconduct or policy violations.

Martinez Confirmed Only That the Investigation Remained Open

426. On January 5, 2026, MARTINEZ responded to plaintiff's memorialization.

427. MARTINEZ did not state that Human Resources had concluded plaintiff committed misconduct.

428. She did not identify any policy plaintiff had violated.

429. She did not identify any disciplinary finding.

430. Instead, MARTINEZ stated that Human Resources was "still conducting an investigation into allegations of a toxic work environment in DCB for which you were named a Respondent."

431. MARTINEZ emphasized that Human Resources had not stated plaintiff was no longer under investigation or review and advised that Human Resources would continue the investigation and communicate its conclusion.

432. Plaintiff had not claimed that the investigation had ended.

433. She had attempted to memorialize what had actually occurred during the December 29 meeting and the absence of any finding against her.

434. MARTINEZ's response therefore left plaintiff in essentially the same professional position in which she had existed for months: formally under investigation, financially affected by that investigation, but without a determination that she had actually engaged in misconduct.

Plaintiff's Union Representative Independently Understood the Meeting as Developmental Rather Than Disciplinary

435. Plaintiff's understanding of the December 29 meeting was not hers alone.

436. On December 30, 2025, plaintiff's union representative, Michael Simpson, separately emailed MARTINEZ concerning the meeting.

437. Simpson described the meeting as productive.

438. He stated that challenges had been identified and solutions discussed.

439. Simpson specifically suggested mentorship and training because plaintiff was new to her supervisory responsibilities.

440. He further stated that, based upon plaintiff's presentation, he believed plaintiff would continue to be an asset to the Bronx District Attorney's Office if provided appropriate tools and professional development.

441. MARTINEZ responded: "I agree that yesterday's meeting was productive. We will be in touch soon to discuss next steps."

442. This exchange is significant because an independent participant in the meeting understood that the discussion had produced recommendations for training and development rather than findings that plaintiff had committed misconduct.

443. MARTINEZ herself agreed that the meeting had been productive and referred to future "next steps."

Plaintiff Observed a Materially Different Employment Trajectory For A Male Employee Associated with A Substantiated Sexual-Harassment Matter

444. The December 29 discussion also caused plaintiff to examine the manner in which her own protected EEO activity affected her career compared with the treatment of employees who had themselves been accused of sexual harassment.

445. Plaintiff understood that Damian Rowe had been the respondent in a sexual-harassment EEO matter that was substantiated at approximately the same time as plaintiff's complaint against Clarke.

446. Plaintiff does not know every circumstance concerning Rowe's EEO matter or subsequent employment decisions and does not allege facts outside her present knowledge.

447. Plaintiff does know, however, that Rowe later became a supervisor within the Domestic Violence Bureau and subsequently obtained another professional opportunity within Legal Recruitment and Retention.

448. Plaintiff's own experience was materially different.

449. Plaintiff was the successful complainant in a substantiated sexual-harassment matter.

450. Clarke remained within her bureau.

451. Plaintiff continued working around him.

452. Plaintiff ultimately occupied a position from which, as MARTINEZ herself acknowledged, she effectively supervised him.

453. MARTINEZ then questioned whether plaintiff should ever have been promoted within DCB because plaintiff had "too many issues with individuals in that location."

454. Plaintiff therefore observed that an employee she understood to have been the respondent in a substantiated sexual-harassment matter was able to obtain supervisory and professional opportunities, while plaintiff's own successful EEO complaint became intertwined with Human Resources' questioning of whether she belonged in her supervisory assignment.

455. Plaintiff alleges that this comparison warrants discovery into whether defendants applied materially different standards to employees who complained of sexual harassment and employees who were accused of engaging in it.

The Investigation Chilled Plaintiff's Willingness to Raise Concerns and Perform Her Supervisory Role

456. By the end of December 2025, plaintiff's experience had materially altered the manner in which she approached her employment.

457. Plaintiff had previously been willing to raise concerns, identify deficiencies, propose reforms, document performance problems, and bring ideas to management.

458. During the December 29 meeting itself, however, plaintiff stated that she had begun to feel that "everything I do" could be used against her.

459. As the investigation continued, plaintiff increasingly questioned whether documenting an employee problem, identifying an inconsistency, raising an operational concern, or making an ordinary supervisory decision would generate another allegation against her.

460. That chilling effect is particularly significant because plaintiff's employment required her to identify and address problems.

461. Defendants had trained plaintiff to exercise leadership, instructed her to document employee deficiencies, and assigned her responsibility for ensuring compliance.

462. Plaintiff nevertheless began to fear that performing those same responsibilities could expose her to further investigation.

463. Plaintiff alleges that this deterrent effect constitutes part of the retaliatory harm caused by defendants' conduct.

The Selective Nature of The Investigation Remained Unexplained

464. Plaintiff also continued to question why an investigation concerning DCB leadership resulted in only three supervisors being treated as respondents.

465. DCB had approximately eight supervisors.

466. The supervisory group included a Black man, three White women, a Hispanic supervisor, and the three Black women who became respondents.

467. Plaintiff does not presently know the criteria used to select the respondent group.

468. She does not know who initially authorized the investigation, who received the complaints, who reviewed them, or who ultimately decided which supervisors would be formally investigated.

469. Plaintiff does not allege facts she cannot presently prove.

470. She does allege, however, that the resulting pattern is objectively significant: the only three supervisors plaintiff understood to have been formally designated as respondents and subjected to corresponding compensation consequences were Black women.

471. Plaintiff further alleges that MARTINEZ, DILLON, and POLANCO were involved in Human Resources' administration of the investigation and that MARTINEZ eventually assumed the principal role in communicating concerning its continuation.

472. Plaintiff is entitled to discovery concerning who selected the respondents, what criteria were used, what complaints were considered, how similarly situated supervisors were treated, and why only the three Black women within the supervisory structure were subjected to the challenged investigation and compensation consequences.

Plaintiff Memorialized the December Meeting Because Human Resources Had Still Made No Findings

473. On January 2, 2026, plaintiff sent MARTINEZ and POLANCO a detailed written memorialization of the December 29 investigatory meeting.

474. Plaintiff did so because, after waiting approximately five months to be interviewed, she did not want there to later be a dispute concerning what Human Resources had told her or how the meeting had been characterized.

475. Plaintiff memorialized her understanding that the meeting had been investigatory and non-disciplinary.

476. She further documented that no findings or determinations had been communicated to her.

477. Plaintiff understood that many of the concerns discussed during the meeting involved employee perceptions of her supervisory style rather than identified violations of Office policy.

478. Plaintiff also memorialized that mentorship, additional training, and professional development had been discussed as potential responses to concerns regarding her development as a relatively new supervisor.

479. Plaintiff made clear that she wanted to remain within DCB.

480. She was not asking to abandon supervision or avoid accountability.

481. She wanted to continue developing in the position for which the Office had selected her and was willing to receive appropriate mentorship and training.

482. Plaintiff's January 2 correspondence is significant because it created a contemporaneous written record of her understanding immediately after the investigative meeting rather than after litigation commenced.

Martinez Confirmed That the Investigation Was Nearing Completion But Still Did Not Issue Findings

483. On January 5, 2026, plaintiff again contacted Human Resources concerning the status of her summer professional-staff bonus.

484. MARTINEZ responded that Human Resources was still investigating allegations of a toxic work environment within DCB and that plaintiff remained a named respondent.

485. Plaintiff clarified that she was not claiming the investigation had ended.

486. Rather, plaintiff explained that she understood the December 29 meeting not to have resulted in findings of misconduct against her.

487. Later that day, MARTINEZ advised plaintiff that the investigation was "at the end of the review" and that Human Resources would contact her when the process concluded.

488. That representation is important because, by January 5, Human Resources was characterizing the investigation as essentially approaching completion.

489. Plaintiff nevertheless did not receive a final determination.

490. Plaintiff was not told what additional investigative work remained.

491. She was not told whose approval was required before the matter could be closed.

492. She was not told when the "end of the review" would actually result in a written disposition.

493. Plaintiff understood MARTINEZ to be leading the investigation at that stage, with DILLON and POLANCO also involved, but she did not know whether some additional decisionmaker was required to approve the final result.

494. The absence of transparency concerning who controlled closure of the investigation became increasingly significant as the consequences of the unresolved investigation continued.

Plaintiff Continued Trying to Contribute to The Office While the Investigation Remained Pending

495. Plaintiff did not stop working, withdraw from Office initiatives, or abandon efforts to contribute after the December investigatory meeting.

496. In January 2026, plaintiff reviewed a memorandum concerning the District Attorney's Youth Justice Stakeholder Conference and developed a framework addressing communication among systems, community exposure and prevention, longer-term structural reform, resource alignment, funding, partnerships, and measurable outcomes.

497. On January 28, 2026, plaintiff sent those ideas to the Division Chief and Deputy Division Chief within her own division.

498. Plaintiff did not represent herself as a Youth Justice expert and did not seek control over the initiative.

499. She expressly framed her submission as observations provided "for awareness" and as an effort to contribute ideas aligned with the District Attorney's stated mission.

500. When plaintiff received no acknowledgement, she followed up on February 9 merely to confirm that the material had been received.

501. On February 10, Deputy Division Chief Gina Mignola responded that she was "always impressed" by plaintiff's enthusiasm and commitment to Youth Justice issues, but emphasized that subject-matter experts should lead that work.

502. Plaintiff responded respectfully, clarified that she had not intended to displace the Office's subject-matter experts, and reaffirmed her respect for the distinct roles within the Office.

503. These events are relevant not because plaintiff possessed any entitlement to have her proposal adopted, but because they demonstrate that she continued attempting to engage

constructively with the Office even while an unresolved investigation remained pending against her.

504. Plaintiff was still reading, researching, proposing ideas, and attempting to contribute beyond her minimum job responsibilities.

505. Her conduct during this period is inconsistent with any suggestion that she had disengaged from the Office or ceased attempting to develop as a supervisor.

Plaintiff Repeatedly Sought a Status Update as The Investigation Passed Six Months

506. During January and February 2026, plaintiff continued asking her union for information concerning the investigation.

507. She contacted Michael Simpson and Keisha Graham on January 28 and followed up again on January 30, February 3, and February 4.

508. By that point, the investigation had been open for more than six months.

509. Plaintiff explained that she was not attempting to interfere with the process or demand an improper result.

510. She wanted to know where she stood professionally after having been told that the investigation was nearing closure.

511. Simpson ultimately advised plaintiff that the union could not expedite Human Resources' investigation and possessed no authority over the withheld bonuses.

512. Plaintiff was therefore again directed back to Human Resources—the same department that controlled the investigation and the release of her compensation.

A Second Professional-Staff Bonus Was Withheld Because the Investigation Remained Open

513. In February 2026, another professional-staff bonus became payable to eligible employees.

514. Plaintiff did not receive that bonus either.

515. By February 17, plaintiff therefore had two professional-staff bonuses being withheld while the same Human Resources investigation remained unresolved.

516. What began in July 2025 as withholding plaintiff's summer bonus for "up to 90 days" had expanded into the withholding of two separate compensation payments over a period substantially longer than ninety days.

517. Plaintiff understood that the second bonus was withheld because the same investigation remained pending.

518. Plaintiff does not presently know whether a new, separate decision was made to withhold the February bonus or whether the continued open status of the investigation automatically caused the second payment to be withheld.

519. Plaintiff similarly does not know the precise individual who authorized continued withholding of the first bonus beyond the original ninety-day period.

520. Plaintiff alleges only what the evidence presently supports: Human Resources controlled whether Finance could release the payments; DILLON and MARTINEZ were involved in communications concerning the withholding; and MARTINEZ later possessed authority to authorize release of both bonuses.

521. This second withholding materially increased the consequences of leaving the investigation unresolved.

522. The investigation was no longer merely an unresolved personnel matter.

523. It was continuing to affect plaintiff's compensation even after Human Resources had represented that the matter was "at the end of the review."

524. Plaintiff alleges that the continued economic consequences, without findings of misconduct, further support her contention that the investigation operated as an adverse condition of employment rather than a neutral fact-finding process.

A Separate Attendance Issue Then Became Another Human Resources Matter

525. During the same period, plaintiff experienced a separate scheduling issue concerning February 10, 2026.

526. On February 6, plaintiff had provided notice concerning personal business that would affect her schedule on February 10.

527. Plaintiff initially expected to report to work and leave early.

528. When the circumstances changed, plaintiff spoke with her Chief and with Gabrielle Sfera and advised that she would instead arrive later.

529. Plaintiff ultimately reported to work and remained beyond her regular 4:00 p.m. end time.

530. Plaintiff did not understand herself to have been absent without authorization or to have simply disregarded her work schedule.

531. From plaintiff's perspective, she had communicated the change to supervision and then reported to work.

532. The February 10 entry later appeared on the monthly attendance report as approximately five hours and fifty-three minutes of lateness.

533. Plaintiff became concerned because she had worked for the Office for approximately six years without a comparable time-and-attendance problem.

534. The appearance of the February entry therefore represented another departure from plaintiff's prior employment experience.

Plaintiff Attempted to Resolve the Attendance Entry Through the Established Process

535. On April 28, 2026, plaintiff contacted Kevin Jacob in Timekeeping to determine how she could challenge or correct the February entry.

536. Plaintiff had never previously gone through that process and asked basic procedural questions concerning where the meeting would occur and approximately how long it would take.

537. Plaintiff's concern about timing was practical.

538. DCB staffing had declined while discovery volume remained substantial, and supervisors were themselves assisting with the operational workload.

539. Plaintiff wanted to ensure that her absence for an HR meeting would not create additional staffing problems for the bureau.

540. Jacob advised plaintiff that changes to the attendance entry had to be addressed through Human Resources, including through Demi Hunte-Josiah and MARTINEZ.

541. Plaintiff explained that she possessed documentation showing she had communicated about February 10.

542. Jacob advised plaintiff to preserve that documentation because written proof of communication could support her request to correct the attendance entry.

543. Plaintiff also learned from Jacob that, when Jacob contacted Joel Wright regarding the entry, Wright reportedly stated that plaintiff had not communicated anything concerning the schedule change.

544. Plaintiff disputes that characterization.

545. She recalls communicating with supervision and believed she had followed the applicable chain of command.

546. Plaintiff alleges that this discrepancy became particularly significant because, after months of investigation and scrutiny, she again found herself in a position where her own account of an ordinary workplace event appeared not to be credited.

The May 1 Human Resources Meeting Reinforced Plaintiff's Perception Of Heightened Scrutiny

547. On May 1, 2026, plaintiff met with Human Resources concerning the February attendance entry.

548. Plaintiff understood that the purpose of the meeting was to address the timekeeping issue and determine whether the entry should remain on the monthly report.

549. Plaintiff explained her normal schedule, the personal matter she had anticipated on February 10, the original plan to leave early, the subsequent change in circumstances, and the communications she had with supervision concerning her later arrival.

550. MARTINEZ acknowledged that plaintiff had provided advance notice that she would be dealing with a personal matter on February 10.

551. The dispute instead focused upon whether plaintiff had sufficiently documented in writing the change from leaving early to arriving late.

552. MARTINEZ explained that Office policy required twenty-four hours' advance notice for a lateness not to be treated as lateness.

553. MARTINEZ also acknowledged that she did not necessarily agree with the practical rigidity of that policy because employees cannot always predict when circumstances will cause them to be late.

554. Plaintiff repeatedly explained that she had communicated with her supervisors.

555. Plaintiff further explained what Jacob had told her concerning Wright's reported statement that plaintiff had not communicated anything.

556. Plaintiff found that particularly troubling because she believed she had followed the chain of command and was herself a supervisor telling Human Resources what she had done.

557. During the meeting, plaintiff stated, "It just seems like my words are not good enough."

558. That statement is significant because it reflected the broader employment experience plaintiff had been describing since the investigation began.

559. Plaintiff did not perceive the May attendance issue as an isolated disagreement over paperwork.

560. By then, she had spent approximately ten months under investigation, had two bonuses withheld, had waited five months merely to be interviewed, and still had no final determination.

561. Against that background, being required to repeatedly defend her account of a single scheduling issue reinforced her perception that ordinary employment matters involving her were receiving heightened scrutiny.

Plaintiff Became Emotionally Distressed During The May 1 Meeting

562. The May 1 meeting became increasingly upsetting to plaintiff.

563. Plaintiff explained that she continued coming to work even while dealing with difficult personal circumstances and did not have a history of simply failing to report.

564. Plaintiff began crying during the meeting.

565. She told MARTINEZ that she felt attacked.

566. MARTINEZ stated that she was not attacking plaintiff and eventually offered to pause the discussion.

567. Plaintiff also expressly told MARTINEZ that she did not trust Human Resources.

568. That statement did not arise from a single disagreement concerning February 10.

569. By May 2026, plaintiff had already experienced concerns regarding confidentiality of her substantiated EEO matters, an investigation opened without disclosure of the allegations, months of delay before an interview, continuing uncertainty concerning the investigation, racialized descriptions of her supervisory demeanor, two withheld bonuses, and no final findings.

570. Plaintiff's distrust must therefore be understood within the cumulative history preceding the May meeting.

571. MARTINEZ ultimately directed plaintiff to leave for the day and advised that, if the discussion continued at another time, plaintiff should bring a union representative.

572. MARTINEZ then connected plaintiff with Wellness personnel.

Plaintiff Immediately Reported That She Felt Everything She Did Was Being Scrutinized

573. Plaintiff went directly from the Human Resources meeting to Wellness while still crying.

574. Her statements to Wellness are significant because they were made contemporaneously with the event rather than reconstructed months later.

575. Plaintiff stated, "Everything I do is just scrutinized is what it feels like."

576. She again explained that she had communicated with her Chief concerning the February schedule issue and that she felt as though her account was not being credited.

577. Plaintiff further stated:

578. "I just feel like, a lot, I'm being scrutinized. Like everything, everything. It's like somebody's waiting for 'aha, got you.' That's what it feels like."

579. Plaintiff did not contend that she should be immune from correction or that Office rules should not apply to her.

580. Her concern was that routine conduct involving her appeared to be examined through a lens in which someone was attempting to identify additional wrongdoing.

581. That concern was consistent with what plaintiff had already expressed during the December 29 investigatory meeting when she stated that she felt as though "everything I do" could be used against her.

582. The consistency between plaintiff's December 2025 and May 2026 statements materially supports that her perception of heightened scrutiny developed during the challenged conduct itself.

Even Wellness Did Not View Plaintiff's Conduct As "Combative"

583. During the Wellness discussion, plaintiff also described MARTINEZ having characterized her behavior during the Human Resources interaction as "combative."

584. That characterization was significant to plaintiff because it followed earlier descriptions of her as "loud," "boisterous," "intimidating," "cold," "off-putting," and speaking as though she were "out in the street."

585. The Wellness employee speaking with plaintiff did not characterize plaintiff's presentation as combative.

586. Instead, the Wellness employee described what they were observing as frustration.

587. Plaintiff alleges that distinction is important because the repeated use of subjective negative descriptors concerning her demeanor became a continuing feature of how her conduct was characterized.

588. The contrast between "combative" and "frustrated" further illustrates why plaintiff disputes defendants' characterization of her responses as evidence of a personality or disciplinary problem rather than understandable reactions to an investigation and employment process that had remained unresolved for months.

By May 2026, The Investigation Had Become a Continuing Condition of Plaintiff's Employment

589. By May 2026, nearly ten months had passed since Human Resources opened the investigation.

590. The original ninety-day period had long expired.

591. Plaintiff had not been interviewed until December.

592. In January, MARTINEZ represented that the investigation was "at the end of the review."

593. A second bonus was nevertheless withheld in February.

594. Plaintiff continued working and performing supervisory duties.

595. A separate attendance matter then returned plaintiff to Human Resources, where the interaction ended with plaintiff crying and being referred to Wellness.

596. Plaintiff still had no written findings concerning the original investigation.

597. Plaintiff alleges that, viewed cumulatively, these events demonstrate that the unresolved investigation had become more than a discrete personnel inquiry.

598. It affected her compensation.

599. It affected her sense of professional security.

600. It altered how she perceived routine interactions with Human Resources and management.

601. It chilled her willingness to speak freely, exercise supervisory judgment, and raise concerns without fearing that ordinary conduct would be reframed as another basis for criticism.

602. Plaintiff nevertheless continued reporting to work and performing the responsibilities assigned to her.

603. Plaintiff alleges that this continuing pattern of scrutiny, economic consequences, and unresolved professional uncertainty forms part of the discriminatory and retaliatory treatment challenged in this action.

Comparator and Differential Treatment Matrix

Employee	Race	Gender	Relevant Issue	Treatment / Outcome	Comparison to Williams	Use
Ieasha Williams	Black	Female	Substantiated EEO complainant; later toxic-work-environment investigation; attendance issue	Investigation >1 year; two bonuses withheld; repeated scrutiny; no communicated misconduct finding	Baseline	Discrimination / retaliation
Damian Rowe	Black	Male	Reportedly respondent in substantiated sexual-harassment matter	Later promoted to supervisor; subsequently moved to Legal Recruitment & Retention	Williams was complainant, yet her EEO history became relevant to questioning her supervisory placement	EEO treatment / advancement
Estephany Moronta	Hispanic	Female	Attendance / timekeeping issues; reported resignation	Remained employed; HR intervention; reportedly placed in another position	Williams's attendance issue generated HR scrutiny while investigation remained pending	Attendance / corrective opportunity

Employee	Race	Gender	Relevant Issue	Treatment / Outcome	Comparison to Williams	Use
Gideon Bimpey	Black	Male	Attendance / timekeeping issues	Permitted to transition out of DCB	No known comparable prolonged investigation or compensation withholding	Attendance / transfer
Mame Djigal	Black	Female	Performance, attendance, communication, professionalism issues	HR/evaluation appeal process; Williams's supervisory conduct repeatedly examined	Shows scrutiny of Williams's efforts to supervise and document deficiencies	Context / scrutiny
Nicole Colgan	Mixed-Race	Female	Attendance, lateness, remote-work issues	Retained remote-work privileges; transferred to another bureau	Different flexibility and reassignment treatment	Attendance / transfer
Joseph Muroff	White	Male	Accidental email recipient issue	Consequences presently unknown	Williams's comparable email mistake repeatedly resurfaced despite immediate recall	Scrutiny comparator
Oral Clarke	Black	Male	Respondent in substantiated EEO complaint; later conduct Martinez called retaliation	Remained in DCB; Williams required to avoid him; later effectively within her supervisory authority	Williams bore workplace consequences despite being complainant	Retaliation / remedial treatment
Jeffrey Bolden	Black	Male	Respondent in substantiated EEO complaint	Remained near Williams after finding; later separated for unrelated reasons	Williams remained exposed to respondent after substantiation	Remedial treatment

Why The Comparator Evidence Matters

604. Plaintiff did not begin comparing her treatment to other employees because she believed every workplace issue had to be handled identically.

605. She began paying attention to those differences because her own investigation did not end.

606. Had Human Resources promptly interviewed plaintiff, reached a determination, communicated the result, and concluded the process, plaintiff would have had substantially less reason to question how other employees with attendance, performance, EEO, or workplace issues were treated.

607. That is not what occurred.

608. Plaintiff's investigation remained open month after month.

609. First, one professional-staff bonus was withheld.

610. Then a second bonus was withheld.

611. Plaintiff continued working.

612. She continued supervising employees.

613. She continued being expected to document deficiencies and hold employees accountable.

614. She completed her supervisory probation.

615. Yet Human Resources still did not provide her with a final written disposition or identify a finding of misconduct.

616. Against that background, plaintiff began observing that other employees appeared to have attendance, performance, disciplinary, EEO, transfer, or workplace issues addressed and resolved while her own matter remained indefinitely open.

617. Some employees were transferred.

618. Some received other professional opportunities.

619. Some remained employed despite documented attendance or performance concerns.

620. Some appeared to have discrete workplace mistakes addressed without the same continuing scrutiny plaintiff experienced.

621. Plaintiff does not allege that she presently knows every circumstance surrounding those employees' personnel histories or every decision made by Human Resources.

622. The significance of the comparator evidence is instead that the differences she observed raised legitimate questions concerning whether the same standards, investigative intensity, remedial opportunities, and employment consequences were being applied to her.

623. Those questions became particularly significant because plaintiff was one of only three Black women within DCB supervision who, to her knowledge, were designated as respondents in the toxic-work-environment investigation and subjected to corresponding compensation consequences.

624. Plaintiff therefore alleges that the comparator evidence is relevant not because every employee was identically situated in every respect, but because it may demonstrate materially different treatment concerning investigation, discipline, compensation, transfer, professional opportunity, and scrutiny under comparable workplace circumstances.

625. Plaintiff ultimately sought legal advice because the longer her investigation remained unresolved, the more difficult it became to reconcile her treatment with the manner in which other workplace issues appeared to be handled.

Plaintiff Completed Her Supervisory Probation While the Investigation Remained Open

626. Plaintiff completed her supervisory probation in or about March 2026.

627. By that time, the Human Resources investigation had been pending for most of the period during which plaintiff was actually learning and performing her new supervisory role.

628. Plaintiff had therefore spent a substantial portion of her probationary period working under the uncertainty of an unresolved investigation.

629. Plaintiff was concerned about whether the open investigation could affect her successful completion of probation, her ability to obtain future transfers or assignments, or her eligibility for additional professional advancement within the Office.

630. Those concerns did not cause plaintiff to stop performing her duties.

631. Plaintiff continued supervising employees, addressing discovery obligations, documenting performance issues, and performing the responsibilities assigned to her.

632. Plaintiff nevertheless successfully completed her supervisory probation.

633. Plaintiff was not removed from the supervisory position.

634. She was not advised that she had failed probation.

635. She was not disciplined based upon the allegations underlying the investigation.

636. She was not provided with a finding that she had violated an Office policy.

637. Yet the investigation still did not end.

638. Plaintiff alleges that her successful completion of supervisory probation while the investigation remained unresolved further undermines any suggestion that Human Resources was responding to an established finding that she was incapable of performing the supervisory role.

Plaintiff Continued Performing Her Duties Despite the Continuing Investigation

639. After the May 1, 2026 Human Resources meeting, plaintiff returned to work and continued performing her responsibilities.

640. Plaintiff did not stop functioning because the investigation had become emotionally exhausting.

641. DCB's discovery obligations continued.

642. Plaintiff continued supervising staff.

643. She continued reviewing work.

644. She continued responding to emails and operational issues.

645. She continued addressing the discovery responsibilities assigned to her.

646. Plaintiff's continued performance is significant because the harm she alleges did not take the form of an inability or refusal to work.

647. She continued performing while carrying the professional uncertainty created by an investigation that had remained unresolved since July 2025.

648. Plaintiff alleges that defendants' continued reliance upon an open-ended investigation placed her in the position of having to supervise employees while simultaneously questioning whether virtually any supervisory decision she made might later be used against her.

Plaintiff Continued Seeking Release of The Compensation Withheld Because Of The Investigation

649. By the summer of 2026, plaintiff still had not received either the 2025 summer professional-staff bonus or the 2026 winter professional-staff bonus.

650. The first bonus had originally been withheld in July 2025 after DILLON advised plaintiff that the withholding would continue for "up to 90 days" pending determination of the investigation.

651. By July 2026, nearly one year had passed since that representation.

652. On July 2, 2026, plaintiff again emailed MARTINEZ, POLANCO, and DILLON concerning the status of both withheld bonuses.

653. Plaintiff received no immediate substantive response.

654. On July 14, 2026, plaintiff followed up.

655. MARTINEZ thereafter added Chief Financial Officer Dahianna Castillo and Deputy Chief Financial Officer Claudia Ricciardi to the communication and advised plaintiff:

656. "Good afternoon, Ieasha, Finance is working on this matter, and we ask for your continued patience. They will be in touch with you as soon as possible."

657. That response was significant because Finance had previously advised plaintiff that it could not independently release bonuses associated with an Human Resources matter and required official direction from Human Resources.

658. Plaintiff therefore understood that Human Resources remained directly involved in determining whether the withheld compensation could be released.

Defendants Ultimately Released Both Bonuses Without Resolving The Investigation

659. In or about August and September 2026, plaintiff's 2025 summer professional-staff bonus and 2026 winter professional-staff bonus were finally released.

660. Plaintiff was entitled to receive the compensation that had been withheld, and she welcomed its eventual release.

661. The release of the bonuses, however, did not resolve the underlying Human Resources investigation.

662. Plaintiff had originally been told that the first bonus would be withheld for up to ninety days pending determination of that investigation.

663. Ninety days passed.

664. More than six months passed.

665. In January 2026, MARTINEZ advised plaintiff that the investigation was "at the end of the review."

666. Additional months nevertheless passed.

667. A second bonus was withheld.

668. Eventually, both bonuses were released.

669. Yet plaintiff still did not receive a written determination explaining what Human Resources had actually concluded.

670. Plaintiff alleges that the release of the compensation and resolution of the investigation are materially distinct events.

671. Repayment of withheld compensation did not tell plaintiff whether the allegations had been substantiated.

672. It did not tell her whether they had been unsubstantiated.

673. It did not identify any policy violation.

674. It did not inform her whether Human Resources considered the matter closed.

675. Nor did it eliminate the professional consequences of having spent more than one year working under an unresolved investigation while two compensation payments were withheld.

676. Plaintiff does not presently know who originally authorized the withholding of the first bonus, who decided to continue withholding it after expiration of the original ninety-day period, or whether a separate decision was made concerning the second bonus.

677. Plaintiff alleges only what she presently knows: DILLON communicated the original withholding; Finance directed plaintiff to MARTINEZ and DILLON because Human Resources authorization was required before release; Human Resources continued administering

the matter; and MARTINEZ ultimately possessed authority concerning release of the compensation.

More Than One Year After the Investigation Began, Plaintiff Still Had No Findings

677. By September 2026, more than one year had passed since DILLON notified plaintiff on July 24, 2025 that "HR has opened an official investigation into certain allegations levied against you."

678. The original communication represented that plaintiff would learn the allegations during a meeting to be scheduled "in the near future."

679. Plaintiff instead waited approximately five months for the substantive investigatory interview.

680. The original communication also represented that plaintiff's summer bonus would be withheld for up to ninety days pending determination of the investigation.

681. Instead, the first bonus remained withheld substantially beyond that period, and a second bonus was later withheld while the same investigation remained open.

682. Plaintiff participated in the December 29 investigatory interview.

683. She memorialized her understanding of that meeting in writing.

684. Her union representative separately described the meeting as productive and recommended mentorship and training.

685. MARTINEZ thereafter advised plaintiff that the investigation was "at the end of the review."

686. Plaintiff repeatedly contacted Human Resources and her union concerning its status.

687. She completed supervisory probation.

688. She continued working.

689. She continued supervising employees.

690. She experienced additional scrutiny concerning attendance and supervisory communications.

691. She attended the May 1 Human Resources meeting and contemporaneously told Wellness that she felt as though "everything" she did was being scrutinized.

692. Both withheld bonuses were ultimately released.

693. Yet plaintiff still had no written disposition explaining the outcome of the investigation.

Plaintiff Again Sought a Written Disposition

694. In September 2026, plaintiff again contacted Human Resources concerning the status of the investigation.

695. Plaintiff specifically requested that, if a final disposition had been issued, she be provided with it in writing.

696. If no final disposition had been issued, plaintiff requested information concerning when she could expect one.

697. By that point, plaintiff's concern was no longer limited to the bonuses.

698. She had received the withheld compensation.

699. Plaintiff wanted to know what the Office had concluded about allegations that had followed her professionally for more than one year.

700. If Human Resources had determined that plaintiff committed misconduct, plaintiff wanted to know what conduct had been substantiated.

701. If the allegations had been found unsubstantiated, plaintiff wanted that determination memorialized.

702. If the investigation remained open, plaintiff wanted to know what investigative work could still remain outstanding more than one year after it began.

703. Plaintiff alleges that an employee should not be required to continue indefinitely under the professional cloud of an investigation while the employer simultaneously declines to state whether the employee committed any wrongdoing.

The Continuing Investigation Altered the Way Plaintiff Performed Her Supervisory Role

704. By September 2026, the continuing investigation had also changed the manner in which plaintiff approached ordinary supervision.

705. Plaintiff remained responsible for documenting employee performance and conduct problems.

706. She remained responsible for reviewing employee work and addressing deficiencies.

707. Yet plaintiff increasingly questioned what would happen after she documented a legitimate performance concern.

708. She questioned whether management would evaluate the employee's conduct or redirect the inquiry toward the manner in which plaintiff had supervised the employee.

709. Those concerns were not hypothetical in plaintiff's experience.

710. Plaintiff had already seen her supervisory communications, documentation practices, tone, employee corrections, attendance, and ordinary workplace interactions repeatedly examined while the original investigation remained unresolved.

711. Plaintiff alleges that the investigation therefore produced a continuing deterrent effect upon the manner in which she exercised supervisory judgment.

712. She remained obligated to hold employees accountable while simultaneously fearing that doing so could generate another complaint or become another basis for scrutiny directed at her.

713. That is particularly significant because plaintiff's position required her to identify deficiencies rather than ignore them.

714. Plaintiff alleges that defendants' conduct placed her in the untenable position of being responsible for enforcement while being made to fear the consequences of enforcing the standards management itself required.

Plaintiff Continued to Question Whether the Same Standards Were Applied Equally

715. By the end of this period, plaintiff was no longer questioning only why the investigation had taken so long.

716. She was questioning whether the same standards of investigation, discipline, scrutiny, transfer, corrective opportunity, and professional development were applied equally across the Office.

717. That concern developed from the cumulative pattern she observed: employees with documented attendance, performance, EEO, or workplace issues appeared in various instances to receive resolution, transfers, additional opportunities, or closure while plaintiff's own investigation remained open without findings.

718. Plaintiff does not contend that she possesses complete knowledge of every other employee's personnel circumstances.

719. She does contend that the disparities she observed, together with the composition of the respondent group, the prolonged withholding of her compensation, the racialized descriptions of her supervisory demeanor, and the use of circumstances connected to her substantiated EEO activity to question her supervisory placement, support an inference that the process applied to her was neither neutral nor evenhanded.

720. Plaintiff alleges that this continuing pattern forms part of the discriminatory and retaliatory treatment challenged under the New York State Human Rights Law and the New York City Human Rights Law.

CONCLUSION

721. Plaintiff alleges that THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, subjected her to discriminatory and retaliatory employment practices because of her race and protected EEO activity.

722. Plaintiff further alleges that DARLENE MARTINEZ, SEAN DILLON, and MELISSA POLANCO personally participated in, administered, facilitated, or continued the challenged investigation, compensation withholding, and related employment scrutiny.

723. Plaintiff further alleges that DARCEL D. CLARK is liable to the extent the evidence establishes her personal participation in, authorization, approval, or condonation of the discriminatory and retaliatory practices alleged herein.

724. As a direct and proximate result of the conduct of THE CITY OF NEW YORK, DARCEL D. CLARK, DARLENE MARTINEZ, SEAN DILLON, and MELISSA POLANCO, plaintiff suffered economic and non-economic harm and was subjected to unlawful discrimination and retaliation in violation of the New York State Human Rights Law and the New York City Human Rights Law.

VIOLATIONS AND CLAIMS ALLEGED

AS AND FOR A FIRST CAUSE OF ACTION
RACE DISCRIMINATION
NEW YORK STATE HUMAN RIGHTS LAW
Executive Law § 296(1)(a), (6)

725. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

726. Plaintiff is a Black woman who was qualified for her position, satisfactorily performed her duties, and was promoted to Trial Preparation Assistant Supervisor after years of employment without a history of discipline, attendance problems, or Human Resources investigations.

727. After plaintiff returned from maternity leave and began performing supervisory duties, Human Resources opened an investigation concerning leadership and an alleged toxic work environment within DCB.

728. Although DCB had approximately eight supervisors, the three supervisor's plaintiff understood to have been designated as respondents and subjected to corresponding compensation consequences were plaintiff, Seyi Jemmott-Collins, and Latasha Summers, all Black women.

729. SEAN DILLON notified plaintiff that the investigation had been opened and that her professional-staff bonus would be withheld before plaintiff had been interviewed, informed of the specific allegations, or found to have violated any Office policy.

730. DARLENE MARTINEZ thereafter led or substantially administered the investigation, participated in plaintiff's investigatory interview, continued communicating that the investigation remained open, and exercised authority over the release of plaintiff's withheld compensation.

731. During the investigation, plaintiff was characterized as "loud," "boisterous," "intimidating," "cold," "off-putting," and as speaking as though she were "out in the street." MARTINEZ herself acknowledged that such descriptions can carry particular implications when applied to Black women.

732. Notwithstanding that acknowledgment, those subjective and racially coded descriptions remained part of the scrutiny directed toward plaintiff while the three Black women supervisors remained the respondent group.

733. MELISSA POLANCO participated in the Human Resources investigation, including plaintiff's December 29, 2025 investigatory interview and subsequent communications concerning the continuing investigation and plaintiff's compensation.

734. DARCEL D. CLARK, as District Attorney and the direct supervisory authority over employees appointed to the Office of the Bronx County District Attorney, exercised ultimate supervisory authority over the personnel structure within which the challenged discriminatory practices occurred and authorized, approved, condoned, or permitted those practices to continue.

735. Plaintiff further alleges that employees outside her protected class who experienced attendance, performance, disciplinary, EEO, transfer, or other workplace issues received materially more favorable treatment, including faster resolution, reassignment, continued professional opportunities, or substantially less prolonged scrutiny.

736. The selective respondent group, the racialized characterizations of plaintiff's demeanor, the prolonged investigation, the withholding of compensation, and the differential treatment of other employees support an inference that race was a motivating factor in the adverse treatment imposed upon plaintiff.

737. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, discriminated against plaintiff in the terms, conditions, compensation, and privileges of employment because of race in violation of Executive Law § 296(1)(a).

738. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, approved, facilitated, condoned, continued, or aided and abetted the discriminatory practices alleged herein and are individually liable pursuant to Executive Law § 296(6).

739. As a direct and proximate result, plaintiff suffered economic loss, emotional distress, humiliation, damage to her professional standing, and other compensable injuries.

AS AND FOR A SECOND CAUSE OF ACTION
SEXUAL HARASSMENT
NEW YORK STATE HUMAN RIGHTS LAW
Executive Law § 296(1)(h), (6)

740. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

741. Plaintiff was subjected to workplace sexual harassment by Jeffrey Bolden and Oral Clarke and pursued separate EEO complaints concerning that conduct.

742. On September 12, 2023, the Office substantiated both complaints and thereby acquired actual knowledge that plaintiff had been subjected to sexual harassment in the workplace.

743. Notwithstanding those substantiated findings, the Office failed to meaningfully separate plaintiff from Bolden or Clarke.

744. Bolden remained on the same floor in a location plaintiff routinely had to pass, while Clarke remained assigned to DCB.

745. After plaintiff returned from maternity leave as a newly promoted supervisor, she was instructed to avoid Clarke, remain on the opposite side of rooms from him during meetings, and avoid the corridor where he worked.

746. Plaintiff understood that those directions originated with DARLENE MARTINEZ.

747. Rather than removing the burden created by the substantiated harassment, the Office required plaintiff to alter her own movements and workplace interactions while Clarke remained within the bureau.

748. Plaintiff was thereafter placed in a supervisory structure in which MARTINEZ acknowledged that plaintiff effectively exercised supervisory authority over Clarke.

749. During the December 29, 2025 investigatory interview, MARTINEZ expressly acknowledged that plaintiff was the complainant, Clarke was the respondent, the complaint had been substantiated, and the resulting supervisory arrangement was “quite ridiculous.”

750. MARTINEZ further acknowledged that Clarke’s continued discussion and mocking of the EEO matter constituted retaliation and stated that Clarke should not remain under plaintiff’s leadership.

751. DARCEL CLARK, as District Attorney and direct supervisory authority over employees appointed to the Office, exercised authority over the personnel structure that permitted the continued workplace consequences of the substantiated harassment.

752. MARTINEZ personally participated in the administration of the workplace arrangement that required plaintiff to avoid Clarke and later acknowledged that the arrangement should not have existed.

753. SEAN DILLON and MELISSA POLANCO participated in Human Resources matters affecting plaintiff after the substantiated harassment and in the later investigation during which the continuing consequences of that harassment became part of the scrutiny directed toward plaintiff.

754. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, subjected plaintiff to inferior terms, conditions, and privileges of employment because of sex by failing to provide an effective workplace remedy after substantiated sexual harassment.

755. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, facilitated, continued, condoned, or aided and abetted the unlawful practices alleged herein and are individually liable pursuant to Executive Law § 296(6).

756. As a direct and proximate result, plaintiff suffered emotional distress, humiliation, disruption of her working conditions, and other compensable injuries.

AS AND FOR A THIRD CAUSE OF ACTION
HOSTILE WORK ENVIRONMENT
NEW YORK STATE HUMAN RIGHTS LAW
Executive Law § 296(1)(h), (6)

757. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

758. Plaintiff was subjected to inferior terms, conditions, and privileges of employment because of race and sex.

759. The hostile work environment included the Office's failure to meaningfully remedy substantiated sexual harassment, plaintiff's continued exposure to Clarke, the requirement that plaintiff alter her movements to avoid him, and the later use of those circumstances in evaluating plaintiff's suitability as a supervisor.

760. The hostile environment also included the selective investigation of the three Black women supervisors, the withholding of plaintiff's compensation, and the continuing scrutiny of plaintiff's supervisory decisions and communications.

761. DARLENE MARTINEZ participated directly in that environment by administering the investigation, acknowledging the racial implications of descriptions such as "loud," "boisterous," and "intimidating," questioning whether plaintiff should have been a supervisor in DCB because of her "issues" with employees there, and continuing the investigation without communicating a finding of misconduct.

762. SEAN DILLON initiated the formal communication of the investigation and compensation withholding, continued advising plaintiff that the investigation remained open, and participated in later employment-related scrutiny involving plaintiff.

763. MELISSA POLANCO participated in plaintiff's investigatory interview and in Human Resources communications concerning the continuing investigation and withheld compensation.

764. DARCEL CLARK exercised direct supervisory authority over employees appointed to the Office and authorized, approved, condoned, or permitted the conditions challenged herein to continue within the personnel structure under her supervision.

765. Plaintiff alleges that these acts and omissions, viewed collectively, subjected her to a working environment in which her race, sex, and prior experiences of sexual harassment materially affected how her conduct, authority, and professional judgment were perceived and treated.

766. The conduct complained of exceeded petty slights and trivial inconveniences and subjected plaintiff to inferior terms, conditions, and privileges of employment.

767. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, violated Executive Law § 296(1)(h).

768. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, facilitated, continued, condoned, or aided and abetted the hostile work environment alleged herein and are individually liable pursuant to Executive Law § 296(6).

769. As a direct and proximate result, plaintiff suffered emotional distress, humiliation, professional harm, and other compensable injuries.

AS AND FOR A FOURTH CAUSE OF ACTION
RETALIATION
NEW YORK STATE HUMAN RIGHTS LAW
Executive Law § 296(7), (6)

770. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

771. Plaintiff engaged in protected activity by opposing sexual harassment, filing EEO complaints against Jeffrey Bolden and Oral Clarke, participating in the EEO process, and continuing to report conduct arising from those substantiated complaints.

772. The Office substantiated both complaints, and DARCEL CLARK, DARLENE MARTINEZ, SEAN DILLON, MELISSA POLANCO, and other personnel within the Office knew or became aware of plaintiff's protected EEO activity.

773. After plaintiff engaged in protected activity, the Office failed to meaningfully separate her from Clarke and later placed plaintiff in a supervisory structure in which MARTINEZ acknowledged that plaintiff effectively supervised him.

774. MARTINEZ further acknowledged that Clarke's continued discussion of plaintiff's EEO matter constituted retaliation and that the reporting arrangement involving plaintiff and Clarke was "quite ridiculous."

775. During the same investigatory interview, however, MARTINEZ questioned whether plaintiff should have been permitted to become a supervisor in DCB because plaintiff had "too many issues with individuals in that location."

776. Plaintiff alleges that those "issues" included circumstances created by the Office's own failure to adequately address the consequences of plaintiff's substantiated EEO activity.

777. DILLON notified plaintiff that Human Resources had opened an investigation against her and that her compensation would be withheld, notwithstanding that plaintiff had not yet been interviewed or informed of the specific allegations.

778. DILLON thereafter continued communicating that the investigation remained open while plaintiff's compensation remained withheld beyond the original ninety-day period.

779. MARTINEZ continued administering the investigation, represented that it was "at the end of the review," exercised authority concerning release of the withheld bonuses, and nevertheless failed to provide plaintiff with a final written disposition.

780. POLANCO participated in the investigation and in communications concerning its continuation and the employment consequences imposed upon plaintiff.

781. CLARK, as District Attorney and direct supervisory authority over employees appointed to the Office, possessed and exercised authority over the personnel structure within which plaintiff's protected activity and the retaliatory treatment alleged herein occurred and authorized, approved, condoned, or permitted that treatment to continue.

782. Plaintiff was subjected to the withholding of two professional-staff bonuses, prolonged investigation, heightened scrutiny of ordinary supervisory conduct, questioning of her suitability to supervise within DCB, and continuing professional uncertainty.

783. Plaintiff further alleges that the treatment she experienced would reasonably deter an employee from opposing discrimination or pursuing EEO remedies.

784. The temporal sequence, MARTINEZ's express linkage of plaintiff's prior EEO history to her supervisory placement, the continued consequences of the substantiated complaints, and the adverse employment actions imposed upon plaintiff support a causal connection between plaintiff's protected activity and the retaliatory treatment.

785. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, retaliated against plaintiff in violation of Executive Law § 296(7).

786. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, facilitated, continued, condoned, or aided and abetted the retaliatory practices alleged herein and are individually liable pursuant to Executive Law § 296(6).

787. As a direct and proximate result, plaintiff suffered economic loss, emotional distress, humiliation, professional harm, and other compensable injuries.

AS AND FOR A FIFTH CAUSE OF ACTION
RACE DISCRIMINATION
NEW YORK CITY HUMAN RIGHTS LAW
New York City Administrative Code §§ 8-107(1)(a), 8-107(6), 8-130

788. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

789. Plaintiff is a Black woman who was qualified for her position, satisfactorily performed her duties, and was promoted to Trial Preparation Assistant Supervisor after years of employment without a history of discipline, attendance problems, or Human Resources investigations.

790. After plaintiff returned from maternity leave and began performing supervisory duties, Human Resources opened an investigation concerning leadership and an alleged toxic work environment within DCB.

791. Although DCB had approximately eight supervisors, the three supervisor's plaintiff understood to have been designated as respondents and subjected to corresponding compensation consequences were plaintiff, Seyi Jemmott-Collins, and Latasha Summers, all Black women.

792. SEAN DILLON notified plaintiff that the investigation had been opened and that her professional-staff bonus would be withheld before plaintiff had been interviewed, informed of the specific allegations, or found to have violated any Office policy.

793. DARLENE MARTINEZ thereafter substantially administered the investigation, participated in plaintiff's investigatory interview, continued communicating that the investigation remained open, and exercised authority concerning release of plaintiff's withheld compensation.

794. During the investigation, plaintiff was characterized as "loud," "boisterous," "intimidating," "cold," "off-putting," and as speaking as though she were "out in the street." MARTINEZ acknowledged that such descriptions can carry particular implications when applied to Black women.

795. MELISSA POLANCO participated in the investigation, including plaintiff's December 29, 2025 investigatory interview and subsequent Human Resources communications concerning the continuing investigation and plaintiff's compensation.

796. DARCEL D. CLARK, as District Attorney and the direct supervisory authority over employees appointed to the Office of the Bronx County District Attorney, exercised

supervisory authority over the personnel structure within which the discriminatory practices occurred and authorized, approved, condoned, or permitted those practices to continue.

797. Plaintiff further alleges that employees outside her protected class received more favorable treatment concerning investigation, attendance, transfers, professional opportunities, discipline, and workplace scrutiny.

798. Plaintiff was thereby treated less well than other employees, at least in part because of her race.

799. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, discriminated against plaintiff in compensation and in the terms, conditions, and privileges of employment in violation of New York City Administrative Code § 8-107(1)(a).

800. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, facilitated, continued, condoned, or aided and abetted the discriminatory practices alleged herein in violation of New York City Administrative Code § 8-107(6).

801. Pursuant to New York City Administrative Code § 8-130, these provisions must be construed independently and liberally to accomplish the uniquely broad and remedial purposes of the NYCHRL.

802. As a direct and proximate result, plaintiff suffered economic loss, emotional distress, humiliation, professional harm, and other compensable injuries.

AS AND FOR A SIXTH CAUSE OF ACTION
SEXUAL HARASSMENT
NEW YORK CITY HUMAN RIGHTS LAW
New York City Administrative Code §§ 8-107(1)(a), 8-107(6), 8-130

803. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

804. Plaintiff was subjected to workplace sexual harassment by Jeffrey Bolden and Oral Clarke, and the Office substantiated plaintiff's separate EEO complaints against both individuals on September 12, 2023.

805. The Office thereby possessed actual knowledge that plaintiff had been subjected to sexual harassment.

806. Notwithstanding those findings, Bolden remained in plaintiff's immediate workplace and Clarke remained assigned to DCB.

807. After plaintiff returned from maternity leave as a newly promoted supervisor, she was instructed to avoid Clarke, remain on the opposite side of rooms from him during meetings, and avoid the corridor where he worked.

808. Plaintiff understood that those directions originated with DARLENE MARTINEZ.

809. Plaintiff was thereafter placed in a supervisory structure in which MARTINEZ acknowledged that plaintiff effectively exercised supervisory authority over Clarke.

810. MARTINEZ further acknowledged that plaintiff had been the complainant, Clarke had been the respondent, the complaint had been substantiated, and the resulting supervisory arrangement was "quite ridiculous."

811. Plaintiff alleges that the Office's response placed the continuing burden of the substantiated harassment upon her rather than meaningfully remedying the workplace consequences of that harassment.

812. DARCEL CLARK exercised direct supervisory authority over employees appointed to the Office and over the personnel structure that permitted those conditions to continue.

813. MARTINEZ personally participated in the administration of the workplace arrangement involving plaintiff and Clarke and later acknowledged that the arrangement should not have existed.

814. SEAN DILLON and MELISSA POLANCO participated in Human Resources matters affecting plaintiff while the consequences of the substantiated harassment remained unresolved and later became part of the scrutiny directed toward plaintiff.

815. Plaintiff was thereby treated less well because of her gender and subjected to inferior terms and conditions of employment.

816. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, violated New York City Administrative Code § 8-107(1)(a).

817. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, facilitated, continued, condoned, or aided and abetted the unlawful practices alleged herein in violation of New York City Administrative Code § 8-107(6).

818. The NYCHRL must be construed independently and liberally pursuant to New York City Administrative Code § 8-130.

819. As a direct and proximate result, plaintiff suffered emotional distress, humiliation, disruption of her working conditions, and other compensable injuries.

AS AND FOR A SEVENTH CAUSE OF ACTION
HOSTILE WORK ENVIRONMENT
NEW YORK CITY HUMAN RIGHTS LAW
New York City Administrative Code §§ 8-107(1)(a), 8-107(6), 8-130

820. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

821. Plaintiff was subjected to inferior terms, conditions, and privileges of employment and was treated less well because of race and gender.

822. The hostile work environment included the failure to meaningfully remedy substantiated sexual harassment, plaintiff's continued exposure to Clarke, the requirement that plaintiff alter her movements to avoid him, and the later use of those circumstances in questioning plaintiff's suitability as a supervisor.

823. The hostile environment further included the selective investigation of the three Black women supervisors, withholding of plaintiff's compensation, racialized descriptions of plaintiff's demeanor, and continuing scrutiny of her supervisory decisions, communications, attendance, and workplace conduct.

824. DARLENE MARTINEZ directly participated in that environment by administering the investigation, acknowledging the racial implications of descriptions such as "loud," "boisterous," and "intimidating," questioning whether plaintiff should have supervised within DCB because of her "issues" with employees there, and continuing the investigation without communicating a finding of misconduct.

825. SEAN DILLON communicated the investigation and compensation withholding, continued advising plaintiff that the investigation remained open, and participated in later employment-related scrutiny concerning plaintiff.

826. MELISSA POLANCO participated in plaintiff's investigatory interview and in Human Resources communications concerning the continuing investigation and withheld compensation.

827. DARCEL CLARK exercised direct supervisory authority over employees appointed to the Office and authorized, approved, condoned, or permitted the challenged conditions to continue within the personnel structure under her supervision.

828. Taken together, these acts subjected plaintiff to treatment that exceeded petty slights and trivial inconveniences and caused her to be treated less well because of race and gender.

829. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, violated New York City Administrative Code § 8-107(1)(a).

830. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, facilitated, continued, condoned, or aided and abetted the hostile work environment in violation of New York City Administrative Code § 8-107(6).

831. Pursuant to New York City Administrative Code § 8-130, plaintiff's NYCHRL hostile-work-environment claim must be construed independently and more liberally than analogous federal and state claims.

832. As a direct and proximate result, plaintiff suffered emotional distress, humiliation, professional harm, and other compensable injuries.

AS AND FOR AN EIGHTH CAUSE OF ACTION
RETALIATION
NEW YORK CITY HUMAN RIGHTS LAW
New York City Administrative Code §§ 8-107(7), 8-107(6), 8-130

833. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

834. Plaintiff engaged in protected activity by opposing sexual harassment, filing EEO complaints against Jeffrey Bolden and Oral Clarke, participating in the EEO process, and

continuing to report retaliation and other consequences arising from the substantiated EEO findings.

835. DARCEL CLARK, DARLENE MARTINEZ, SEAN DILLON, MELISSA POLANCO, and other Office personnel knew or became aware of plaintiff's protected EEO activity.

836. After plaintiff engaged in protected activity, the Office failed to meaningfully separate her from Clarke and later placed her in a supervisory structure in which MARTINEZ acknowledged that plaintiff effectively supervised him.

837. MARTINEZ further acknowledged that Clarke's continued discussion of plaintiff's EEO matter constituted retaliation and that the reporting arrangement involving plaintiff and Clarke was "quite ridiculous."

838. During the same investigatory interview, MARTINEZ questioned whether plaintiff should have been permitted to supervise within DCB because she had "too many issues with individuals in that location," including circumstances arising from the Office's own handling of plaintiff's substantiated EEO complaint.

839. DILLON notified plaintiff that Human Resources had opened an investigation against her and that her compensation would be withheld before plaintiff had been interviewed or informed of the specific allegations.

840. DILLON thereafter continued communicating that the investigation remained open while plaintiff's compensation remained withheld beyond the original ninety-day period.

841. MARTINEZ continued administering the investigation, advised plaintiff that it was "at the end of the review," exercised authority concerning release of the withheld bonuses, and nevertheless failed to provide plaintiff with a final written disposition.

842. POLANCO participated in the investigation and in Human Resources communications concerning its continuation and the employment consequences imposed upon plaintiff.

843. CLARK exercised direct supervisory authority over employees appointed to the Office and authorized, approved, condoned, or permitted the retaliatory practices alleged herein to continue.

844. Plaintiff was subjected to the withholding of two professional-staff bonuses, prolonged investigation, heightened scrutiny of ordinary supervisory conduct, questioning of her suitability to supervise within DCB, and continuing professional uncertainty.

845. The conduct complained of was reasonably likely to deter a person from engaging in protected activity and constituted retaliation "in any manner" within the meaning of New York City Administrative Code § 8-107(7).

846. The temporal sequence, MARTINEZ's express discussion of plaintiff's EEO history when questioning her supervisory placement, the continuing consequences of the substantiated complaints, and the adverse employment treatment imposed upon plaintiff support a causal connection between plaintiff's protected activity and the retaliatory conduct.

847. THE CITY OF NEW YORK, acting through employees appointed to the Office of the Bronx County District Attorney, retaliated against plaintiff in violation of New York City Administrative Code § 8-107(7).

848. CLARK, MARTINEZ, DILLON, and POLANCO personally participated in, authorized, facilitated, continued, condoned, or aided and abetted the retaliatory practices alleged herein in violation of New York City Administrative Code § 8-107(6).

849. Pursuant to New York City Administrative Code § 8-130, plaintiff's retaliation claim must be construed independently and liberally in favor of accomplishing the NYCHRL's remedial purposes.

850. As a direct and proximate result, plaintiff suffered economic loss, emotional distress, humiliation, professional harm, and other compensable injuries.

JURY TRIAL

851. Plaintiff IEASHA WILLIAMS hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff IEASHA WILLIAMS respectfully demands judgment against THE CITY OF NEW YORK, DARCEL D. CLARK, DARLENE MARTINEZ, SEAN DILLON, and MELISSA POLANCO as follows:

a. Declaring that the acts and practices complained of herein violated the New York State Human Rights Law and the New York City Human Rights Law;

b. Awarding plaintiff compensatory damages in an amount to be determined at trial for emotional distress, humiliation, loss of dignity, injury to professional standing, and other non-economic injuries caused by the discriminatory, hostile, and retaliatory conduct alleged herein;

c. Awarding plaintiff all economic damages proven at trial, including lost compensation, employment benefits, promotional opportunities, and other economic losses caused by the unlawful practices alleged herein;

d. Awarding punitive damages against DARCEL D. CLARK, DARLENE MARTINEZ, SEAN DILLON, and MELISSA POLANCO under the New York

City Human Rights Law in an amount sufficient to punish and deter the unlawful conduct established at trial;

e. Permanently enjoining THE CITY OF NEW YORK, DARCEL D. CLARK, DARLENE MARTINEZ, SEAN DILLON, and MELISSA POLANCO from engaging in further discrimination or retaliation against plaintiff because of her race, sex, prior EEO complaints, opposition to discrimination, or participation in protected activity;

f. Directing THE CITY OF NEW YORK and the Office of the Bronx County District Attorney to provide plaintiff with a final written disposition of the Human Resources investigation commenced on or about July 24, 2025 and to remove or correct any unsupported, discriminatory, retaliatory, or unresolved adverse notation arising from that investigation in plaintiff's personnel and employment records;

g. Directing THE CITY OF NEW YORK and the Office of the Bronx County District Attorney to ensure that the investigation challenged herein, and any unsupported allegations arising therefrom, are not used to impair plaintiff's compensation, assignments, transfers, promotional opportunities, professional development, or other terms and conditions of employment;

h. Awarding plaintiff reasonable attorneys' fees, costs, and expenses pursuant to Executive Law § 297(10), New York City Administrative Code § 8-502(g), and all other applicable law;

i. Awarding pre-judgment and post-judgment interest as permitted by law; and

j. Granting such other and further legal and equitable relief as this Court deems just and proper.

Dated: October 7, 2026
Yonkers, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff IEASHA WILLIAMS

THE SANDERS FIRM, P.C.
30 Wall Street, 8th Floor
New York, NY 10005
(212) 652-2782 (Business Telephone)
(212) 652-2783 (Facsimile)

Website: http://www.thesandersfirmpc.com

VERIFICATION

STATE OF NEW YORK)
: ss.:
COUNTY OF WESTCHESTER)

IEASHA WILLIAMS, being duly sworn, deposes and says:

I am the plaintiff in the within action. I have read the foregoing Verified Complaint and know the contents thereof. The same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

Ieasha Williams
IEASHA WILLIAMS

Sworn to before me this
7th day of October, 2026.

Notary Public

/s/Eric Sanders, Esq.
Notary Public, State of New York
Commission No. 02SA0013820
Qualified in Westchester County
Commission Expires: September 26, 2027

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

IEASHA WILLIAMS

Plaintiff,

-against-

THE CITY OF NEW YORK; DARCEL D. CLARK; DARLENE MARTINEZ; SEAN DILLON; and MELISSA POLANCO

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders
Attorney for Plaintiff IEASHA WILLIAMS

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