

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented to: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;"> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> </div>	
_____ and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr. Ms. Mrs.) Ms. Alexandra Zervos-Pariti		Home Phone (Incl. Area Code) <div style="background-color: black; width: 100px; height: 20px; margin: 5px 0;"></div>	Date of Birth <div style="background-color: black; width: 100px; height: 20px; margin: 5px 0;"></div>
Email: <div style="background-color: black; width: 200px; height: 20px; margin: 5px 0;"></div>			
S _____ City, State and ZIP Code <div style="background-color: black; width: 200px; height: 20px; margin: 5px 0;"></div>			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name Volunteers of America Greater New York		No. Employees, Members 100+	Phone No. (Include Area Code) 212-873-2600
Street Address _____ City, State and ZIP Code 135 West 50th Street, 9th Floor New York, NY 10020			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify below.)		DATE(S) DISCRIMINATION TOOK PLACE Earliest (ADEA/EPA) Latest (All) 09.05.23 10/31/23	
THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s): <div style="text-align: center; padding: 20px 0;"> <i>(Please find the attached narrative statement of facts).</i> </div> Charging Party is represented by: Gerry Filippatos, Esq. and Alfredo J. Pelicci of Filippatos PLLC 425 Madison Ave, New York, NY Pgf@filippatoslaw.com ; apelicci@filippatoslaw.com (914) 984-1111, ext. 500			
<input checked="" type="checkbox"/> I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct. <div style="text-align: center; margin: 20px 0;"> </div> <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="text-align: center;"> 06/05/2024 _____ Date </div> <div style="text-align: center;"> _____ Charging Party Signature </div> </div>		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NEW YORK DISTRICT OFFICE**

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ALEXANDRA ZERVOS-PARITI,

Claimant,

**EEOC CHARGE
OF DISCRIMINATION:
NARRATIVE STATEMENT**

-against-

VOLUNTEERS OF AMERICA GREATER NEW YORK,

Respondent.

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Claimant Alexandra Zervos-Pariti (“Charging Party” or “Ms. Pariti”) hereby alleges the following against Respondent Volunteers of America Greater New York (“VOA” or the “Center”) in support of her claims of disability discrimination, discrimination on the basis of ethnicity, and retaliation:

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

1. At all times relevant hereto, Charging Party Alexandra Zervos-Pariti (“Charging Party” or “Ms. Pariti”) has been a resident of the State of New York and the County of Suffolk.
2. At all times relevant hereto, Charging Party is a Greek woman that suffers from general anxiety disorder (“anxiety”).
3. At all times relevant hereto, Volunteers of America Greater New York (“Respondent” “VOA” or the “Center”) was and is a domestic non-profit organization maintaining its principal place of business at 135 West 50th Street, 9th Floor, New York, NY 10020.
4. Upon information and belief, Respondent employs approximately 2,500 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Charging

Party is proceeding herein.

5. At all times relevant hereto, Charging Party was an employee of Respondent.

Material Facts

I. Charging Party's Stellar Career in Accounting and Auditing

6. Ms. Pariti is a highly skilled and experienced accountant and auditor and has seven years of experience in the industry.

7. Prior to becoming an auditor and accountant, Ms. Pariti had a successful career in customer service and retail. Before starting her career, Ms. Pariti completed a Bachelor of Science in Business Administration with an international business concentration from Hofstra University and a Master of Business Administration in Accounting from St. Joseph's University.

8. Ms. Pariti received her certified public accountant ("CPA") license on July 30, 2020, and is a member of American Institute of Certified Public Accountants ("AICPA"). As an accountant and auditor, Ms. Pariti has excelled in her career. She was an audit associate at Nussbaum Yates & Wolpow PC, an audit senior at Grant Thompson LLP, an internal revenue agent at the Internal Revenue Service and a senior accountant at Cold Spring Harbor Laboratory before joining VOA.

II. Charging Party Joins VOA and Quickly Excels

9. Ms. Pariti joined VOA as a controller overseeing the Treasury, Accounts Payable and Financial Reporting Departments on July 10, 2023. She was hired by Julia A. Oliver, Chief Operating Officer ("COO") and Mr. Solana. Ms. Pariti started her job with a three-month probation period and was hired at a salary of \$145,000.

10. At VOA, Ms. Pariti was a consummate team player who was dedicated to helping vulnerable people experiencing homelessness, victims of domestic violence and underprivileged people in New York.

11. Ms. Pariti was remarkably well-liked by her colleagues. Mr. Solana and Ms. Oliver would often praise Ms. Pariti for her exemplary performance and her enthusiastic demeanor at work.

12. For the first two months, Ms. Pariti had a meaningful and enjoyable time at the Center. During the first three-month probation period, Ms. Pariti left a highly favorable impression on both Mr. Solana and Ms. Oliver. As part of her duties during the probation period, Ms. Pariti had to meet Mr. Solana regularly (every Friday) to discuss ongoing work. During these meetings, Mr. Solana expressed his appreciation for Ms. Pariti's contributions and informed her that he was highly satisfied with her performance. Mr. Solana also commended Ms. Pariti's effect on others and how the morale of the team had visibly increased since she started working at VOA. Additionally, Mr. Solana stated that he was impressed by Ms. Pariti's team building initiatives.

13. Ms. Pariti was also well trusted and appreciated by Ms. Oliver. In mid-October, Ms. Oliver showered Ms. Pariti with praise. Ms. Oliver was excited to see Ms. Pariti and invited her into her office where they had a conversation for about two hours. Ms. Oliver told Ms. Pariti that she was a "great fit and asset" for VOA and how she appreciates all the work Ms. Pariti did with the team. Ms. Oliver stated, "you are my go-to" and "I am so happy with your performance" and "you are the future of VOA." Ms. Oliver also shared her vision for improvements to the overall function of the Finance Department and openly discussed her opinions of the interim CEO whose contract was soon ending and the board with Ms. Pariti. She welcomed Ms. Pariti's opinions on some projects and improvements to VOA too, thus emphasizing how positively Ms. Pariti was perceived by people at VOA.

14. There have been numerous instances where Ms. Pariti's colleagues have openly professed their admiration and appreciation of her work and attitude. Veronica Ortega, Special Assistant to COO, often discussed the positive effect Ms. Pariti's addition had on the Finance

Department and how happy Ms. Oliver and Mr. Solana were with her. Keisha Hackney, Assistant to CFO, frequently told Ms. Pariti how “positive” and “great” Ms. Pariti’s arrival had been to the finance team and expressed that even her sister—who was an excellent employee that used to work at VOA before Ms. Pariti’s arrival—wished that she had gotten a chance to work with Ms. Pariti after hearing all the positive feedback she had heard about Ms. Pariti.

15. Internal Audit Director Caroline Malvasio complimented Ms. Pariti’s work, GAAP understanding and adherence, and the positive change she had brought to VOA, pointing out that Ms. Pariti was the only one of the few people who seriously worked on compliance and worked well with the staff. Other members such as Brian Halber (Assistant Vice President of Finance), Erica Harvey (LHH Recruitment Solutions), Sandra Marquez (Assistant Vice President of Asset Management), Bill Grigonis (Vice President of Information Technology), Gil Aviles (Director of Government Contracts) and Jose Rivera (Supervisor of Financial Analysis and Reporting) also complimented her work and innovative ideas.

III. Holly Leahy Joins the New York Team at VOA Where She Harasses and Demeans Ms. Pariti and Her Teammates

16. As noted above, Ms. Pariti’s first two months went very smoothly, and all indications pointed towards her long-term success at VOA. However, things began to drastically change for the worse on September 5, 2023, when Holly Leahy, Assistant Vice President of Finance, joined the New York office of VOA from New Jersey. Wasting no time, Ms. Leahy instantly began to make biased and discriminatory statements directed to and/or about employees that were immigrants or persons of color.

17. It was not long before Ms. Leahy’s bullying and abusive behavior, coupled with her discriminatory conduct, created a toxic work environment for Ms. Pariti, the team she managed and other coworkers at VOA. As discussed below, Ms. Leahy especially directed her vitriol and racist

comments towards Ms. Pariti and her Black and Asian colleagues.

18. In addition to disparate treatment and biased comments based on race, Ms. Leahy made discriminatory comments concerning Ms. Pariti's mental health (disability). Aware that every Friday Ms. Pariti had therapy sessions, Ms. Leahy regularly taunted Ms. Pariti going to therapy, stating "you have therapy again!?" and "you better go to therapy!" while chuckling loudly.

19. Additionally, despite her attempts to become a mother, Ms. Pariti was unable to conceive a child for 15 years. Ms. Leahy was aware of this. Instead of being empathetic, Ms. Leahy used Ms. Pariti's failed attempts to have a child to demean Ms. Pariti, including by telling Ms. Pariti, *"I actually have daughters."*

20. Ms. Leahy also directed biased comments at Ms. Pariti on the basis of Ms. Pariti's ethnicity. Ms. Leahy publicly mocked Ms. Pariti's Greek accent during meetings. On multiple occasions during meetings with others, Ms. Leahy openly mocked how Ms. Pariti pronounced words, including "Schwartz Shelter" and "Westchester." As a result, Ms. Pariti began to overthink her pronunciations of words and experienced panic attacks at work. Ms. Leahy also made discriminatory comments concerning Ms. Pariti's mental health.

21. Ms. Leahy's discriminatory bias against Black and Asian employees was highly pronounced. Ms. Pariti recognized a noticeable difference with the way that Ms. Leahy spoke to and treated Caucasian employees in comparison to how she spoke to employees of color. While it is not possible to recount every example, below are some examples of Ms. Leahy's discriminatory and biased conduct:

- Every Tuesday, Ms. Leahy would be a part of meetings regarding ongoing audit projects. During those meetings, Ms. Leahy openly disparaged and targeted the Black and Asian employees. Ms. Leahy called Black employees "lazy" and mockingly imitated the accents of

Asian employees.

- Ms. Leahy refused to invite Annette Hale, a Black controller, to any meetings (including the meetings pertaining to her own department) and called her “incapable and an idiot.”
- Ms. Leahy made discriminatory comments about a senior accountant named, Ling Na Weng, an Asian employee, who had worked at the Center for two decades. By way of example, Ms. Leahy made demeaning remarks about Ms. Weng including calling her garbage “garbage.” When Ms. Pariti defended Ms. Weng, Ms. Leahy made fun of Ms. Weng’s Asian accent and after doing so asked Ms. Pariti if she “really understands anything Ling says.”
- Ms. Leahy stated that she did not like to speak directly to anyone in the Accounts Payable Department, a department that predominantly consisted of Black and Asian employees. Instead, Ms. Leahy directed Ms. Pariti to speak to them on her behalf. She told Ms. Pariti to “deal with them” while calling them “incapable and useless.” In some instances, when it was necessary for Ms. Leahy to speak with members from the Accounts Payable Department, she would speak to them in a derisive tone and condescending manner. Ms. Leahy never subjected white employees to similar demeaning statements and conduct.
- Ms. Leahy aggressively micromanaged Black employees in a way that she did not manage Caucasian employees. This includes Ms. Leahy micromanaging and disparaging Sheaddean Mullings, a Black accounting assistant who had been at VOA for over a year, by constantly checking in on her work, contacting her incessantly, and calling her “lazy.” Similarly, on October 23, 2023, Demoy Smith, a Black man, joined the team at VOA as a temporary accountant. On his first day, Ms. Leahy obsessively contacted Ms. Pariti and Amir Yousef, Assistant Controller, to ask what Mr. Smith was doing and what his tasks were. As it was his first day, he did not yet have any substantial tasks. She had no reason to watch him this

closely.

22. Ms. Leahy's demeaning behavior traumatized multiple members of VOA so much so that some members quit, and others began to take sick days frequently.

23. Exhausted by Ms. Leahy's discriminatory remarks and treatment, Ms. Pariti made an effort to advocate for her teammates whenever they were targeted by Ms. Leahy. Noticing the low morale amongst her teammates, on October 20, 2023, Ms. Pariti reached out to her entire team and had a quick 15-minute Microsoft Teams call where she thanked them for their hard work and tried to cheer them up. She gave all of them permission to clock out and not work late or over the weekend since the entire team's spirits were deflated and she wanted them to take care of themselves. During that weekend, Ms. Pariti hardly slept because of how depressed she was and cried profusely due to the remarks she and her teammates were being subjected to and how hostile the work environment had become at VOA.

24. On October 23, 2023, Ms. Pariti had a meeting with Mr. Solana and Ms. Leahy to discuss getting more help for auditing. During the meeting, Ms. Leahy again targeted Ms. Weng, the Asian employee whose accent she regularly mocked, stating that "Ling (Ms. Weng) should not be reviewing anyone's work" (Ms. Weng had been the one to approved to review everyone's journal entry for the past 15 years and is a well-respected employee). Ms. Leahy proceeded to call Ms. Weng "garbage" and "useless" (terms that she only directed at or said about employees of color). Ms. Leahy then made baseless complaints about the work product of the assistant controller, assistant manager, and senior manager – all of whom are people of color.

25. Flabbergasted at the blatant mistreatment, Ms. Pariti responded to Ms. Leahy by reminding her, "We are all human beings, and we deserve to be treated as such." Ms. Pariti objected to Ms. Leahy treating employees like "slaves" and stated that Ms. Leahy should speak to her moving

forward concerning her team rather than insulting the members of the team directly. At this point, Mr. Solana muted Ms. Pariti and wrote to her in the Microsoft Teams Chat to “reel it in.”

26. The following week, Ms. Pariti did not go into the office due to insufferable stress, anxiety, lack of sleep, pounding headaches, nausea, and severe depression. On October 26, 2023, Ms. Pariti went to a doctor and was told she had a high fever and sinus infection. Ms. Pariti’s health was deteriorating due to Ms. Leahy’s dreadful and discriminatory behavior towards her and her colleagues.

IV. Ms. Pariti Engages in Protected Activity by Reporting Ms. Leahy’s Racist and Hostile Behavior to Mr. Solana

27. Ms. Pariti made protected complaints to Mr. Solana concerning Ms. Leahy’s discriminatory behavior on four separate occasions. In early October 2023, Ms. Pariti debriefed Mr. Solana about Danielle Sa, a Senior Accountant, not wanting to be contacted by Ms. Leahy due to the discriminatory comments and behavior that she directed at her and her colleagues.

28. Ms. Pariti also notified Mr. Solana about Marina Nassif, a Treasury Accounting Specialist, handing in her two weeks’ notice after being bullied by Ms. Leahy. On October 23, 2023, Ms. Pariti spoke to Mr. Solana about the whole team’s morale being low due to Ms. Leahy’s racist and bullying comments. Charging Party told him that the team was overworked, and Ms. Leahy’s constant harassment made it harder for people to do their jobs.

29. In mid-October 2023, Ms. Pariti pleaded with Mr. Solana to do something after Ms. Leahy made discriminatory comments about Ms. Weng and the Black employees. She mentioned that Ms. Leahy called Ms. Weng “garbage” and “not worthy” and that Ms. Leahy discriminatorily mocked Ms. Weng’s accent.

30. When Ms. Pariti conveyed this information to Mr. Solana he brushed it off and

celebrated Ms. Leahy's actions by saying she is "tough" and was "just doing her job." Ms. Pariti also told Mr. Solana that Jenny Marquin, a Black employee in the Accounts Payable Department, who was once vivacious and lively was now withdrawn, quiet and anxious all the time. Instead of admonishing Ms. Leahy's incorrigible behavior, Mr. Solana agreed that it would be best for Ms. Pariti to handle the members of the Accounts Payable Department instead of Ms. Leahy. However, none of Ms. Pariti's complaints were taken seriously and Ms. Leahy was permitted to continue her discriminatory conduct and was not disciplined.

V. Ms. Pariti is Ruthlessly and Unlawfully Terminated

31. On October 30, 2023, in connection with her ongoing project, Ms. Pariti had a meeting with Ms. Leahy and another controller before they met with the auditors.

32. During the meeting, Ms. Leahy said that Ms. Pariti's work papers—which she had reviewed and approved before—were missing information. When Ms. Pariti asked her to explain what was missing in the work papers, Ms. Leahy got enraged and yelled at Ms. Pariti, "I am not going to bother talking to you ... get off the call." Ms. Pariti was shocked at how rudely Ms. Leahy was behaving and immediately after being viciously kicked off the call, she wrote to Mr. Solana and Ms. Oliver requesting a discussion about Ms. Leahy's behavior and if she—Ms. Pariti—was still employed at VOA. She did not hear back from either Mr. Solana or Ms. Oliver. Ms. Pariti was nervous because she had a meeting with the auditors after her meeting with Ms. Leahy and was afraid of Ms. Leahy humiliating her in front of all the people in the meeting. The distress caused by Ms. Leahy's actions was so severe for Ms. Pariti that she was too anxious to join the call with the auditors.

33. On October 31, 2023, after a full day of work, Ms. Pariti was asked by Mr. Solana to join a meeting about her performance review in the HR room. She was then told that she had

been terminated. Her laptop was taken away and she was told that she should expect to receive a separation letter soon.

34. On November 2, 2023, Ms. Pariti received the termination letter stating that she had been terminated on October 31, 2023. Through the letter, Mr. Solana falsely claimed that Ms. Pariti had failed the initial evaluation period (“IEP”). This was clearly a pretextual excuse as Mr. Solana told Ms. Pariti in the week of October 9, 2023, that she had “passed” the IEP “with flying colors.”

35. In the meeting on October 31, 2023, when Ms. Pariti pointed out that she had never received any corrective actions, Mr. Solana had agreed with her. Even though Ms. Pariti was callously terminated, she asked an HR employee to take care of her team and ensure that they were not bullied by Ms. Leahy.

36. Despite Ms. Pariti’s determination to remain optimistic about and committed to her career at VOA, the ruthless discrimination and retaliation she has suffered at her workplace has rendered her distraught and crestfallen. Indeed, Ms. Pariti’s emotional distress is cognizable given the reality that the Center has allowed Ms. Leahy to openly express her derogatory and racist remarks towards Ms. Pariti without repercussion, while ignoring its obligations to seriously investigate Ms. Pariti’s complaints of discrimination, and instead, terminating her employment for no valid reason. Instead of disciplining her harasser, VOA fired a mere few weeks after she engaged in protected activity.

37. Due to her unlawful termination from the Center and the discrimination, harassment, and retaliation she has endured, Ms. Pariti has begun receiving treatment for her mental health to help cope with the immense stress and uncertainty she must now navigate in what has become the most difficult period of her life. The Center’s actions have caused Ms. Pariti to experience Post Traumatic Stress Disorder.

38. Based on the foregoing discussion, it is clear that Respondent has discriminated and retaliated against Charging Party on the basis of her disability and ethnicity in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq. (“Title VII”); the Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq. (“ADA”); Section 1981 of the Civil Rights Act of 1866, 42 USC § 1981 (“§ 1981”); the New York State Human Rights Law, New York State Executive Law, §§ 296 et seq. (“NYSHRL”); and the New York City Human Rights Law, Administrative Code §§ 8-107 et seq. (“NYCHRL”).