

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ZULEMA MORALES,

Plaintiff,

– against –

PARAGON SYSTEMS, INC., RONALD JOHNSON, in  
his individual and professional capacities, MARC  
PISCIOTTI, in his individual and professional capacities,  
and OMAR MUTAZ, in his individual and professional  
capacities.

Defendants.

**Case No.**

**COMPLAINT**

**JURY TRIAL DEMANDED**

Plaintiff Zulema Morales, by her attorneys, Filippatos PLLC, hereby alleges against Defendants Paragon Systems, Inc. ("Paragon" or the "Company"), Ronald Johnson, Marc Piscioti, and Omar Mutaz (together, the "Individual Defendants") as follows:

**NATURE OF THE CASE**

1. Plaintiff Zulema Morales, a well-respected and accomplished armed security officer, is devastated by the horrific events that have become commonplace at her job working for Paragon Systems, Inc. Despite her exemplary performance as a security officer and supervisor, Paragon has cruelly discriminated against Plaintiff on the basis of her age (62), sex (female), and race (Hispanic).

2. Even more shocking, after Plaintiff courageously spoke up for herself and repeatedly reported this deplorable conduct, Defendants fabricated a sexual harassment complaint against Plaintiff in a shameful display of retaliation. Those who have participated in, stood by, and allowed this pattern of unlawful discrimination to persist must be held accountable for their actions.

3. Accordingly, Plaintiff brings this action against Defendants for discrimination and retaliation based on her age (62), sex (female), and race (Hispanic) in violation of the Age

Discrimination in Employment Act of 1967 (“ADEA”), 29 U.S.C. §§ 621 *et seq.*; Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166 (“Title VII”)); Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 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”).

### **JURISDICTION AND VENUE**

1. Jurisdiction of this Court is proper under 28 U.S.C. § 1331 as Plaintiff alleges claims pursuant to the ADEA, Title VII, and Section 1981.
2. The Court has supplemental jurisdiction over the claims Plaintiff has brought under state and city law pursuant to 28 U.S.C. § 1367.
3. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) as one or more of the Defendants reside within the Southern District of New York and/or the acts complained of occurred and/or originated therein.

### **ADMINISTRATIVE REQUIREMENTS**

4. Plaintiff filed a timely charge of discrimination with the Equal Opportunity Commission (“EEOC”) on March 27, 2023 and received a Notice of Right to Sue as of December 16, 2024.
5. Plaintiff has met all other prerequisites or administrative requirements necessary to bring forth his claims in this action.

### **PARTIES**

6. At all times relevant hereto, Plaintiff Zulema Morales was and is a resident of the State of New York, Kings County.
7. Plaintiff is a 62-year-old, Hispanic woman.

8. At all times relevant hereto, Defendant Paragon was and is a domestic for-profit company maintaining its principal place of business at 13900 Lincoln Park Drive, Suite 300, Herndon, Virginia 20171.

9. Upon information and belief, Paragon employs approximately 1,900 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

10. At all times relevant hereto, Plaintiff was an employee of Paragon, first holding the position of Sergeant, then Lieutenant, and now Captain.

11. At all times relevant hereto, Defendant Ronald Johnson (“Mr. Johnson”) was and is an employee of Paragon, first holding the position of Sergeant, then Lieutenant, and now PSO.

12. At all times whereby Defendant Johnson was in the position of Lieutenant, he was Plaintiff’s supervisor and/or had supervisory authority over her. Defendant Johnson had the authority to hire, terminate, and/or affect the terms and conditions of Plaintiff’s employment, or to otherwise influence the decisionmaker of the same.

13. Upon information and belief, Defendant Johnson resides in the State of New York.

14. At all times relevant hereto, Defendant Marc Piscioti (“Mr. Piscioti”) was and is an employee of Paragon, holding the position of Project Manager.

15. At all times relevant hereto, Defendant Piscioti was Plaintiff’s supervisor and/or had supervisory authority over her. Defendant Piscioti has the authority to hire, terminate, and/or affect the terms and conditions of Plaintiff’s employment, or to otherwise influence the decisionmaker of the same.

16. Upon information and belief, Defendant Piscioti resides in the state of New York.

17. At all times relevant hereto, Defendant Omar Mutaz (“Mr. Mutaz”) was and is an employee of Paragon, first holding the position of Trainer, then Captain, and now Major.

18. At all times when Defendant Mutaz was Captain and Major, he was Plaintiff's supervisor and/or had supervisory authority over her. Defendant Mutaz has the authority to hire, terminate, and/or affect the terms and conditions of Plaintiff's employment, or to otherwise influence the decisionmaker of the same.

19. Upon information and belief, Defendant Mutaz resides in the state of New York.

### **FACTUAL ALLEGATIONS**

#### **I. Plaintiff's Career as an Armed Security Officer**

20. Plaintiff joined Paragon in March 2021 with over 30 years of experience as an Armed Security Officer. Plaintiff's long-standing career began in September of 1989 when she was an Armed Security Officer at Epic Security of New York. Her responsibilities included working in armed vehicles that were going to banks for deposits and pick-ups and working undercover as security in the private sector. In September 1994, Plaintiff became an Armed Security Officer at FJC Security of Long Island City. Her responsibilities included working in the Internal Revenue Service (IRS) building in conjunction with the New York City Water Pollution, Plant and Pumping water stations house. Plaintiff was also in charge of monitoring and patrolling the ground sites and plants, as well as monitoring the televisions from the control room and front desk.

21. In June 1995, Plaintiff became an Armed Security Officer for Copstat Security where she was responsible for the inspection of Citibank ATM machines to ensure that there was no vandalism or interruptions of any service. From September 1995 to June 1997, Plaintiff was an Armed Security Officer at Chelsea Pier Management at Pier 62. Plaintiff's responsibilities included protecting, safeguarding, and monitoring the buildings on the pier, assisting in escorting customers to their destinations on the pier, assisting injured persons, and enforcing general rules, regulations and emergency situations, as well as performing other related tasks.

22. Thereafter, Plaintiff was an Armed Security Supervisor at Lance Investigation until

October 2002. While at Lance Investigation, Plaintiff supervised fifty-two armed guards that covered a four-building complex, prepared schedules, maintained client relationships, and patrolled the complex while enforcing the rules and regulations of the building. After leaving Lance Investigation, Plaintiff was an Armed Security Officer at Armed-Rest Security where she overlooked the protective service officers (PSOs), assisted injured people, monitored and patrolled the facility, and followed various orders while she was at her post.

23. From 2007 to 2013, Plaintiff was an Armed Security Officer at HWA Security Inc., where her responsibilities were synonymous with the responsibilities she had while at Armed-Rest Security. From 2013 to 2018, Plaintiff was an Armed Captain Supervisor for FJC Security Services, Inc. where she was responsible for making schedules, maintaining client relationships, and responding to emergency situations. Thereafter, Plaintiff was an Armed Captain Supervisor at Alante Security Group from 2018 to 2021. While at Alante Security Group, Plaintiff supervised thirty-five PSOs in the Brooklyn Social Security Office, the Internal Revenue Office, and the Census Office. Further, Plaintiff prepared work schedules and maintained client relationships.

## **II. Plaintiff is Hired by Paragon and Soon Thereafter is Subjected to Discriminatory Treatment**

24. In December 2020, Plaintiff interviewed with Mr. Piscioti and Major Mark Morales for the position of Lieutenant. At that time, Plaintiff was going through a great deal in her personal life, including the fact that her nephew had just died tragically in a fire.

25. After so informing both Mr. Piscioti and Mark Morales, they informed her that if she was unable to start working by December 27, 2020, she would have to start as a PSO rather than a Lieutenant. Although she did not want to, Plaintiff had no choice but to start in March 2021 as a PSO despite her 30 years of experience as an Armed Security Officer.

26. Initially, Plaintiff's assimilation into the Company went well; however, things took a turn for the worse in December 2021, after Plaintiff was promoted to Sergeant.

27. Around this time, Mr. Johnson, who was at that time a Sergeant, began constantly verbally harassing Plaintiff by cursing her out in the PSO tent area where Plaintiff was assigned.

28. Upon information and belief, Mr. Johnson had never before, nor would he, speak this way to a male co-worker.

29. When this harassment began, Plaintiff was taken aback, as this was something she had never experienced in any of her prior positions and it was shocking and humiliating, especially since Mr. Johnson berated her so viciously in front of her co-workers.

30. Paragon's handbook states: "Paragon believes in promoting an atmosphere of open communication and cooperation among our personnel"; therefore, Plaintiff informed Mr. Piscioti and Mark Morales of what was going on – i.e., that Mr. Johnson was constantly cursing at her at her post in front of the PSOs.

31. In response, Mr. Piscioti and Mark Morales asked that both Plaintiff and Mr. Johnson join a conference call, at which time Mr. Piscioti downplayed the severity of Mr. Johnson's mistreatment of Plaintiff and instead simply directed them both that they "needed to stop" and do their jobs.

32. Plaintiff's supervisors' approach to the situation shocked Plaintiff as it was a direct contradiction of Paragon's Rules for Personal Conduct (the "Rules").

33. The Rules state that for major rule offenses, the offender may be "discharged if warranted after unpaid suspension and management investigation. Possible probation period determined at the discretion of the Program Manager."

34. Further, the Rules dictate that "major rule offenses" include "[d]isorderly conduct, use of abusive language, quarreling, threats and intimidation by words or action, assault, or participation in disruptive activities which interfere with the moral and efficient operations of the Company and client."

35. Despite the fact that Mr. Johnson had clearly committed such a “major rule offense,” Mr. Piscioti blatantly disregarded the Rules and let Mr. Johnson continue to harass and humiliate Plaintiff without consequence.

36. Furthermore, by directing that both Mr. Johnson and Plaintiff “needed to stop,” Mr. Piscioti essentially blamed Plaintiff for the mistreatment she was experiencing, in clear retaliation for the protected complaint she filed against Mr. Johnson.

### **III. Mr. Johnson Continually Verbally Harasses Plaintiff**

37. Unsurprisingly, the “talk” that Mr. Piscioti had with Plaintiff and Mr. Johnson not only failed to prevent further harassment of Plaintiff but it gave Mr. Johnson permission to increase the frequency and nature of his harassment without consequence.

38. Specifically, on December 22, 2021, Mr. Johnson entered the tent area to which Plaintiff was assigned and ordered a PSO that was Plaintiff’s direct report to go outside; when Plaintiff questioned that decision, Mr. Johnson yelled at Plaintiff, “I don’t fuckin’ have to answer you.”

39. The PSO began to laugh at Plaintiff, causing her to once again feel humiliated and degraded.

40. Plaintiff then asked Mr. Johnson if she could speak with him, which Mr. Johnson refused, insisting that she needed to “earn his respect.”

41. Plaintiff responded to Mr. Johnson stating that he should not be talking to her in that manner because she was also a supervisor.

42. Upon information and belief, Mr. Johnson had never before, nor would he, speak this way to a male co-worker.

43. After this incident, Plaintiff made a complaint to her Captain, Captain Chamberlin, regarding Mr. Johnson’s harassment of her, after which she returned to her post.

44. Upon her return, a PSO told Mark Morales that Mr. Johnson threatened to “fuck her,” as in Plaintiff, if she reported him.

45. Thereafter, Captain Chamberlin attempted to meet with both Plaintiff and Mr. Johnson to discuss the problem, however Mr. Johnson dismissed them both by walking away from the conversation.

46. Mr. Johnson faced no consequences for either his harassment of Plaintiff or his refusal to even speak with Captain Chamberlin regarding Plaintiff’s complaint.

47. Therefore, while Mr. Piscioti, Mark Morales and Captain Chamberlin were all aware of Mr. Johnson’s mistreatment of Plaintiff, none of them reprimanded Mr. Johnson, reported any of the incidents to Human Resources, or instituted any consequences whatsoever for Mr. Johnson’s harassment of Plaintiff. Instead, Mr. Piscioti, Mark Morales and Captain Chamberlin all chose to *protect their fellow male colleague*.

48. About one month later, on January 27, 2022, Plaintiff was again at her post, when Mr. Johnson entered her tent area and told her that he “needed a body,” to which Plaintiff replied that she did not have anyone to give him.

49. Mr. Johnson became irate and screamed at Plaintiff, “I’m not fuckin’ asking,” and he took one of Plaintiff’s PSOs out of the tent area.

50. Just one week later, on February 9, 2022, Mr. Johnson again entered Plaintiff’s tent and yelled at her, “I’m taking two PSOs to give breaks,” to which Plaintiff asked that he wait until the PSOs in the tent have their breaks.

51. Mr. Johnson, once again irate, yelled at Plaintiff, “what the fuck.”

52. Lieutenant Rekha Tapakula (“Ms. Tapakula”) heard Mr. Johnson yell at Plaintiff which caused Ms. Tapakula to call Mr. Johnson outside and attempt to tell him that he should not speak to Plaintiff in that manner.



53. However, Mr. Johnson walked away from Ms. Tapakula, completely ignoring her.

54. On February 16, 2022, Mr. Johnson once again entered Plaintiff's tent and said to two PSOs, "Let's go," to which Plaintiff responded by asking where they were going since those PSOs were her reports.

55. Mr. Johnson barked at Plaintiff, "I'm in charge, not you."

56. Without these PSOs, Plaintiff was unable to cover her post so she informed Ms. Tapakula of what happened, to no avail.

57. Shortly thereafter on March 2, 2022, PSO Rosario was not at her assigned post, but when Plaintiff tried to inquire as to why, Mr. Johnson snapped at her asking, "Why don't you mind your fuckin' business, as long as I know where she is, I will take all the blame if anything comes that she is not at the tent."

58. Mr. Johnson continually treated Plaintiff as if she was beneath him, as evidenced by the fact that on March 17, 2022, he told Plaintiff that he would be taking two of her PSOs, and when she asked where he was taking them, Mr. Johnson responded by once again viciously cursing at Plaintiff in front of multiple PSOs and civilians nearby.

59. Upon information and belief, Mr. Johnson had never before, nor would he, speak this way to a male co-worker.

#### **IV. Plaintiff Hits Her Breaking Point and Submits a Formal Complaint to the Director of the Company**

60. While Plaintiff had previously complained to both Captain Chamberlin and Ms. Tapakula about Mr. Johnson's behavior, nothing had been done to prevent him from continuing to harass her, which was causing Plaintiff significant emotional distress, anxiety, and fear that Mr. Johnson's harassment of her would escalate.

61. On April 28, 2022, Plaintiff followed the Company's guidelines by filing a formal complaint with Mr. Piscioti, outlining all of the aforementioned incidents.

62. However, instead of emailing her back to inform her that the Company would investigate these incidents, Mr. Piscioti simply spoke with Plaintiff via Zoom on May 6, 2022.

63. During this Zoom call, it became clear to Plaintiff that Mr. Piscioti had not investigated any aspect of her complaint. Instead, he asked Plaintiff what she wanted, placing the burden on Plaintiff to craft a solution to her own harassment.

64. Plaintiff was concerned that it once again seemed that Mr. Piscioti was failing to take her complaints seriously and/or treat Mr. Johnson's harassment of her as a violation of the Company's rules.

65. Given this, and unsure of what else to say, Plaintiff responded that she wanted the Company to keep Mr. Johnson away from her.

**V. Instead of Being Reprimanded, Plaintiff's Harasser is Promoted to Lieutenant**

66. Plaintiff was hoping that things would change for the better and that the Company had begun conducting an investigation after a few months passed without Mr. Johnson cursing her out or berating her.

67. She never imagined that in addition to being harassed, discriminated, and retaliated against based on her gender, that she would also begin experiencing mistreatment based on her age.

68. However, on August 30, 2022, Plaintiff was at her post with Captain Thomas Correa ("Mr. Correa") when she received a phone call from her grandson.

69. Mr. Correa saw Plaintiff's grandson's photo appear on her phone and inquired about who it was.

70. When Plaintiff informed him that it was her grandson, he stated: ***"You know, you're too old for this job. You should retire."***

71. Then on August 31, 2022, Plaintiff learned from Mr. Correa that Mr. Johnson was being promoted to Lieutenant.

72. Plaintiff asked how that was possible given the fact that the Company had not completed its investigation into her complaints.

73. Mr. Correa responded: “I don’t know why Piscioti doesn’t like you.”

74. Later that day, Mr. Piscioti and Mark Morales asked to see Plaintiff so they could “explain” why Mr. Johnson was promoted.

75. However, instead of providing an actual explanation as to how Mr. Johnson had been promoted, despite the significant complaints made against him, Mr. Piscioti simply told Plaintiff that since she and Mr. Johnson would not be working on the same shifts, “it would be fine.”

76. After the meeting, Mr. Piscioti falsely told other employees that during this meeting Plaintiff was crying over not getting promoted.

**VI. Plaintiff Continually Suffers from a Hostile Work Environment After She Formally Complains of Discrimination**

77. After being ignored yet again by the Company, Plaintiff wrote a formal complaint to the Vice President of Operations, Steven VanSciver (“Mr. VanSciver”), on September 2, 2022. (Exhibit A).

78. In this complaint, Plaintiff stated that she was being treated differently based on her gender, age, and ethnicity.

79. On September 6, 2022, Mr. VanSciver informed Plaintiff that he forwarded her complaint to the Office of Professional Responsibility; however, to date, no investigation has been conducted.

80. Instead, on September 21, 2022, Mr. Johnson followed Plaintiff into her tent at her post and continually told her, “Everything that happens in this place is your fuckin’ fault,” causing Plaintiff to be fearful for her life given the fact that they are all armed security officers.

81. Throughout Plaintiff’s time at Paragon, she has been the constant target of discrimination, retaliation, and harassment. There have been various times on Zoom where Mr.

Pisciotti would say things like, “You’re the good Morales,” insinuating that there was a “bad” Morales.

82. Further Mr. Pisciotti made comments to Plaintiff about her appearance – one day after Plaintiff got her hair done, she had a Zoom meeting with Mr. Pisciotti who stated, “That’s what the Cuban Zulema Morales looks like.”

83. Despite following the guidance of Paragon’s handbook, Plaintiff still somehow got the short end of the stick while her harasser, Mr. Johnson, was not only never reprimanded, but instead promoted and placed on the exact same shift as her.

84. On February 22, 2023, Mr. Johnson tried to publicly humiliate Plaintiff in front of security guards that she supervises by undermining her authority. That morning, instead of going to his assigned post, Mr. Johnson went to Plaintiff’s post with a stack of papers and demanded that she “go make copies.”

85. Further, he instructed individuals on Plaintiff’s team to get breakfast to exemplify his authority and seniority over Plaintiff.

86. In fact, Mr. Johnson even stayed at the site after he was supposed to leave to “oversee her,” implying that Plaintiff was incapable of properly performing her job without his supervision.

87. On November 29, 2022, Plaintiff was written up for violating the uniform appearance policy. However, Plaintiff only appeared in street clothes because after she changed out of her uniform to leave her post, she found out that her replacement was running late. Instead of leaving the building unattended, despite one Captain suggesting she should, Plaintiff ensured that the building was not left without supervision.

88. On December 4, 2023, Plaintiff was reassigned to work at 26 Federal Plaza, one of the largest and busiest buildings that Paragon contracts with. At 26 Federal Plaza, Plaintiff reported

to Mr. Mutaz, who like Mr. Johnson, began a vicious campaign of harassment and retaliation against Plaintiff.

89. On April 15, 2024, Plaintiff made a complaint to Mr. Mutaz and Mr. Piscioti that Lieutenant Mettanya Newby was refusing to help out on breaks. In response to her complaint, Mr. Mutaz said that he would be investigating the matter. Plaintiff expressed that she was uncomfortable with him investigating the claim because he was not unbiased having worked closely with Ms. Newby, but Mr. Mutaz ignored her request. Thus, Plaintiff never received a fair investigation.

90. Two days later, on April 17, 2024, Sergeant Luis Salas asked Plaintiff to perform a job function that was not under her purview, which she tried to explain; however, he got up into her face and pointed his finger at her as he yelled and cursed “I don’t need this shit. You’re letting the power go to your head” in front of other sergeants.

91. Upon information and belief, Mr. Salas would have never spoken to a male supervisor in this manner.

92. Plaintiff was so mortified and felt so degraded by Mr. Salas’s treatment of her that she went back to her office and cried.

93. The next day, on April 18, 2024, Plaintiff reported the incident with Mr. Salas to management, but her complaint again fell on deaf ears and Defendants neither investigated her complaint nor took any action to prevent this mistreatment from happening again.

94. About a month later, on May 29, 2024, Mr. Mutaz loudly and publicly reprimanded Plaintiff for responding in Spanish to a PSO who addressed her in Spanish, essentially imposing an English-only policy in the workplace.

95. Mr. Mutaz’s English-only policy directly contradicted prior guidance given to Plaintiff by Mr. Piscioti, who advised her that Spanish was allowed as long as her commands to guards were in English.

96. Mr. Mutaz's public call out of Plaintiff regarding her use of the Spanish language left her feeling embarrassed and insecure about speaking her native language with other Hispanic guards.

97. On June 7, 2024, Mr. Mutaz wrote up Plaintiff for being absent, despite her calling in sick and getting confirmation from another supervisor that he would cover for her.

98. Then, in or around July 2024, Paragon changed their payroll and scheduling systems. On July 18, 2024, Mr. Mutaz set up a meeting to train other guards, all of whom were younger than Plaintiff, on the new systems but failed to include Plaintiff. Instead of scheduling another meeting to teach Plaintiff the systems, Plaintiff was forced to reach out to Paragon's corporate office for assistance. At each turn, Plaintiff felt like her supervisors were preventing her from succeeding in her role.

99. On September 24, 2024, Mr. Mutaz notified Plaintiff that moving forward she would be in charge of 290 Broadway, the building where Mr. Johnson, her previous harasser, was located.

100. Paragon's failure to honor her requests that she be separated from Mr. Johnson in the workplace caused Plaintiff extreme emotional distress, anxiety, and fear that Mr. Johnson would pick up where he left off with his mistreatment of her.

101. On November 16, 2024, Ms. Newby, who was ranked below Plaintiff, sent an email to every supervisor at Paragon in which she condescendingly reprimanded Plaintiff for not confirming with her that a PSO was going on vacation. This email, along with others where Ms. Newby publicly stated Plaintiff was not performing her job duties, seemed to be an attempt to embarrass Plaintiff.

102. The fact that this email was permitted without any consequences or objections by high-ranking supervisors further solidified that anyone at Paragon, even Plaintiff's direct reports,

could mistreat her.

103. A few days later, on November 20, 2024, Plaintiff was directed by Mr. Piscioti to go into certain rooms that PSOs were using without permission, remove locks from the lockers, and clean them out.

104. Plaintiff followed Mr. Piscioti's instructions and went with a Federal Protective Service (FPS) officer to these rooms, and the FPS officer clipped the locks on the lockers, removed all prohibited items, and stored them.

105. However, later that day, Ms. Mutaz called Plaintiff and threatened Plaintiff that she would lose her job because he did not know where the items were and that she was responsible.

106. Plaintiff tried to explain that she did not cut the lockers or touch any items and that she only accompanied the FPS officer as a representative of Paragon.

107. Despite this, Mr. Mutaz continued to threaten Plaintiff that she would lose her job simply because she followed the instructions provided to her by Mr. Piscioti.

108. Additionally, upon information and belief, in and around November 2024, members of upper management at Paragon approached members of middle management and asked them to write false statements about Plaintiff.

109. Upon information and belief, any managers who refused to make false statements about Plaintiff, were threatened with write ups and other forms of discipline, including demotion.

110. Also on January 3, 2025, Plaintiff was moved from supervising 26 Federal Plaza, a high-profile building, to supervising over a dozen smaller buildings, including 16 social security offices, 1 IRS office, and 2 other buildings – 1 Bowling Green and 201 Varrick.

111. This was the fourth time Plaintiff was moved in a year – more than any other supervisor.

112.

**VII. Paragon Accuses Plaintiff of Sexual Harassment in a Despicable Display of Retaliation**

113. On January 21, 2025, after Paragon learned that Plaintiff had claims of discrimination, retaliation, and harassment against Mr. Mutaz, Mr. Piscioti sent Plaintiff a write up for a sexual harassment complaint, which had just been made against her by Mr. Mutaz.

114. Mr. Mutaz alleged that on August 12, 2024, five (5) months earlier, Plaintiff had taken a picture of him and saved it to her phone. Further, he accused Plaintiff of calling him “sexy.”

115. However, this is not what occurred during the exchange in question and yet Mr. Piscioti formally disciplined Plaintiff without even asking Plaintiff what occurred.

116. In fact, the morning of August 12, 2024, when Plaintiff walked into 26 Federal Plaza, Mr. Mutaz asked Plaintiff if she could take a picture of him in his new uniform so he could send the photo to his wife.

117. Plaintiff then texted him the picture and specifically said, “Good morning. I’m sending you this because I’m going to delete the picture.”

118. What is even more despicable is that Mr. Piscioti was standing right next to Mr. Mutaz when he asked for the picture to be taken. Thus, Mr. Piscioti not only allowed Mr. Mutaz to make a knowingly false claim against Plaintiff, but he issued discipline against Plaintiff based on this falsity.

119. Further, on the day that Mr. Mutaz alleges Plaintiff called him “sexy,” she had in fact asked him if he was ok because he seemed to have lost a lot of weight and she was concerned about his health.

120. Mr. Mutaz told Plaintiff that his wife asked him to lose weight for his daughter’s Sweet 16, to which Plaintiff simply responded, “Keep up the good work.”

121. In fact, upon information and belief, when other employees at Paragon heard allegations that Plaintiff had called Mr. Mutaz “sexy,” they were in disbelief and questioned its



truthfulness, to say the least, given Plaintiff's reputation amongst PSOs as being a "straight shooter" and always working by the book.

122. Thus, Mr. Mutaz' misrepresentations of fact are clearly pretext to continue discriminating and retaliating against Plaintiff.

123. Now, after Plaintiff refused to sign the false and retaliatory write up for alleged sexual assault, Paragon has continually overworked Plaintiff and understaffed her in hopes that she either quits or fails to complete her duties and responsibilities.

124. Due to the continued discrimination and retaliation that Plaintiff has been subject to at Paragon, Plaintiff has experienced increasingly severe anxiety and high blood pressure, which have resulted in physical manifestations including but not limited to Plaintiff's retina tearing.

### **FIRST CAUSE OF ACTION**

#### **Discrimination in Violation of the ADEA**

##### ***Against All Defendants***

125. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

126. Based on the facts alleged herein, Defendant engaged in unlawful employment practices prohibited by ADEA by discriminating against Plaintiff because of her age.

127. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages, including, but not limited to, economic and pecuniary losses, severe emotional, psychological and physical stress, distress, anxiety, pain and suffering, the inability to enjoy life's pleasures, and other non-pecuniary losses and special damages.

128. Accordingly, as a result of the unlawful conduct of Defendant Paragon set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.

**SECOND CAUSE OF ACTION**  
**Retaliation in Violation of Title ADEA**  
***Against All Defendants***

129. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

130. Based on the facts alleged herein, Defendant Paragon engaged in unlawful employment practices prohibited by the ADEA by retaliating against Plaintiff for engaging in protected activity, such as complaining about the age discrimination and retaliation she faced at the company.

131. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages, including, but not limited to, economic and pecuniary losses, severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures, and other non-pecuniary losses and special damages.

132. Accordingly, as a result of the unlawful conduct of Defendant Paragon set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.

**THIRD CAUSE OF ACTION**  
**Discrimination in Violation of Title VII**  
***Against All Defendants***

133. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

134. As described above, Defendants have discriminated against Plaintiff on the basis of gender and race in violation of Title VII by fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or remedy a hostile work environment and disparate treatment based on sex and race.

135. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of Title VII, Plaintiff has suffered, and will continue to suffer, economic damages, mental anguish, and emotional distress for which she is entitled to an award of damages.

136. Defendants' unlawful discriminatory actions constitute malicious, willful, and wanton violations of Title VII for which Plaintiff is entitled to an award of punitive damages.

**FOURTH CAUSE OF ACTION**  
**Retaliation in Violation of Title VII**  
***Against All Defendants***

137. Plaintiff repeats and realleges each and every allegation made in the above paragraph of this Complaint as if fully set forth herein.

138. As described above, Defendants have retaliated against Plaintiff for engaging in protected activity, including, inter alia, by taking materially adverse employment actions against her.

139. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of Title VII, Plaintiff has suffered, and continues to suffer, economic damages, mental anguish, and emotional distress for which she is entitled to an award of damages.

140. Defendants' unlawful retaliatory actions constitute malicious, willful, and wanton violations of Title VII for which Plaintiff is entitled to an award of punitive damages.

**FIFTH CAUSE OF ACTION**  
**Discrimination in Violation of § 1981**  
***Against All Defendants***

141. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

142. As described above, Defendants have discriminated against Plaintiff on the basis of gender and race in violation of § 1981 by fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or remedy a hostile work environment and disparate treatment based on race.

143. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of § 1981, Plaintiff has suffered, and will continue to suffer, economic damages, mental anguish, and emotional distress for which she is entitled to an award of damages.

144. Defendants' unlawful discriminatory actions constitute malicious, willful, and wanton violations of § 1981 for which Plaintiff is entitled to an award of punitive damages.

**SIXTH CAUSE OF ACTION**  
**Retaliation in Violation of § 1981**  
***Against All Defendants***

145. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

146. As described above, Defendants have retaliated against Plaintiff for engaging in protected activity, including, inter alia, by taking materially adverse employment actions against her.

147. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of § 1981, Plaintiff has suffered, and will continue to suffer, economic damages, mental anguish, and emotional distress for which she is entitled to an award of damages.

148. Defendants' unlawful retaliatory actions constitute malicious, willful, and wanton violations of § 1981 for which Plaintiff is entitled to an award of punitive damages.

**SEVENTH CAUSE OF ACTION**  
**Discrimination in Violation of the NYSHRL**  
***Against All Defendants***

149. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

150. New York Executive Law § 296 provides that:

It shall be an unlawful discriminatory practice: "(a) For an employer or licensing agency, because of an individual's age, race, creed, color, national origin, sexual orientation, military status, sex, disability,

predisposing genetic characteristics, marital status, or domestic violence victim status, to refuse to hire or employ or to bar or to discharge from employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment."

151. Defendants engaged in an unlawful employment practice by discriminating against Plaintiff on the basis of her age, sex, and race.

152. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

153. Accordingly, as a result of the unlawful conduct of Defendants set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.

**EIGHTH CAUSE OF ACTION**  
**Retaliation in Violation of the NYSHRL**  
***Against All Defendants***

154. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

155. By the actions detailed above, among others, Defendants engaged in retaliation against Plaintiff based on her protected activities in violation of the NYSHRL.

156. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm, for whichs he is entitled to an award of damages, in addition to reasonable attorneys' fees and expenses.

157. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, mental anguish and severe

emotional distress, for which she is entitled to an award of damages.

158. Defendants' unlawful and retaliatory actions constitute malicious, willful, and wanton violations of the NYSHRL, for which Plaintiff is entitled to an award of punitive damages.

**NINTH CAUSE OF ACTION**  
**Discrimination in Violation of the NYCHRL**  
***Against All Defendants***

159. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

160. New York City Administrative Code §8-107(1) provides that it shall be unlawful discriminatory practice: "(a) For an employer or an employee or agent thereof, because of the actual or perceived age, race, creed, color, national origin, gender, disability, marital status, sexual orientation, or alienage or citizenship status of any person, to refuse to hire or employ or to bar or to discharge from employment such person or to discriminate against such person in compensation or in terms, conditions, or privileges of employment."

161. Based on the facts alleged herein, Defendants engaged in unlawful employment practices by discriminating against Plaintiff on the basis of her age, sex, and race.

162. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

163. Accordingly, as a result of the unlawful conduct of Defendants set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law, including, but not limited to, liquidated damages.

**TENTH CAUSE OF ACTION**  
**Retaliation in Violation of the NYCHRL**  
***Against All Defendants***

164. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if fully set forth herein.

165. By the actions detailed above, among others, Defendants engaged in retaliation against Plaintiff based on her protected activities in violation of the NYCHRL.

166. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages, including, but not limited to, economic and pecuniary losses; severe emotional, psychological, and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

167. Accordingly, as a result of Defendants' unlawful conduct, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available under this law.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests a judgment against Defendants:

A. Declaring that Defendants engaged in unlawful employment practices prohibited by the Age Discrimination in Employment Act of 1967 ("ADEA"), 29 U.S.C. §§ 621 *et seq.*; Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166 ("Title VII")); Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 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") by discriminating against Plaintiff because of her age (62), sex (female), and race (Hispanic) and retaliating against her for engaging in protected activity;

B. Awarding damages to Plaintiff for all lost wages and benefits resulting from

Defendants' unlawful discrimination and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices;

C. Awarding Plaintiff compensatory damages for mental, emotional, and physical injury, distress, pain and suffering, and injury to her reputation in an amount to be proven at trial;

D. Awarding Plaintiff punitive damages;

E. Awarding Plaintiff liquidated damages;

F. Awarding Plaintiff attorneys' fees, costs, disbursements, and expenses incurred in the prosecution of this action; and

G. Awarding Plaintiff such other and further relief as the Court may deem equitable, just, and proper to remedy Defendants' unlawful employment practices.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: March 13, 2025  
New York, New York

**Respectfully submitted,**

**FILIPPATOS PLLC**



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Officer's Statement:

HR. Page 1

9/2/22

On 9/2/22 I Sgt Zulema Morales assign to Supervision AT 26 Federal. I Sgt Morales writing this statement Because I Need a professional investigation with HR.

I Sgt Zulema Been with GSA Since May 9, 1992. 30 year on a Federal Contract I have never in my Professional Career had Never Been in problem with any Companies. I stated working for Paragon system since 3/21/21 I LEFT Alante Security my Title "Captain of FPS in Brooklyn."

In December of 2020 I Zulema Morales had a interview with MR. MARC Piscioti and MARK Morales For a possession of lieutenant. AT the time my nephew passed away in a fire. MR. M. Piscioti and MR Morales stated tome in my interview that if I cant come on board by Dec 27 2020. That I would have to start as a PSO. Came on Board in March 2021 as a PSO working in Feme Site.

On April 16 2020 I became a Sergeant in NY FPS ever since I have done my job to the best of my abilities.

In December of 2020 my harassment begin with AT the time master Sergeant Ronald Johnson constantly cursing AT me in front of the PSO in Tent area where MR Piscioti assign me

In January I Zulema Morales inform MR Piscioti and MR Mark Morales AT the time MR Piscioti and MR Morales

Sgt Zulema Morales  
Officer's Signature

Dated: 9/2/22

HR. PAGE 2

9/2/22

## Officer's Statement:

had Both me Sgt Z. Morales and Msgr R Johnson on a Conference Call. Mr Piscioti stated for us to do our Job. ~~and~~ and stop.

The harassment Continue after that Cursing Coming into my work area Telling me OFF in front of PSO and the public humiliating me.

After a Few on April 19 2022 Again I Sgt Zulma Morales Email Mr Piscioti and Mr Morales OF the harassment Still going from Msgr R. Ronald Johnson Mr Piscioti Requested a Formal letter with Charges

On April 28 2020 I Provided A Formal letter OF harassment.

A investigation started my Formal letter OF harassment Never GOT to HR.

I Zulma Morales Never GOT until the Date the The Case with Close or Conclusive or unfounded

On may 6 2022 MR Marc Piscioti DID my G + A I stated to Mr Piscioti and Morales that I wanted this to stop that Msgr R Johnson Cannot talk to me like that that he need to stay away from and stop humiliating me Nothing was Done I try to stay Away From Msgr R. Johnson I was worried OF coming to work and going throw that on an every day basis

Sgt Z. Morales  
Officer's Signature

-- Dated: 9/2/22

HR PAGE 3

9/2/22

## Officer's Statement:

After that I Sgt 2 Morales started getting text messages from MR MARK Morales stating to me to stop Complaining and maybe I could get Promoted messages still on my cell.

A month went by MR Piscioti and MR Mark Morales started Promoting 11 Pso straight To lieutenant spots without out putting the Jobs on Email For All Sergeants to Put in for it.

On 8/22/22 MR Piscioti Send me a email For LT Postions For night time Only Send me a Schedule which included All night work. At the time I cant do night Because I TAKE Care my Grandson After 6pm That what I Stated on my email

The Same day MR Piscioti gives MSGT R. Johnson A lieutenant with 3 days Tour 2 night Being trained to go on days. The same MSGT Johnson been harassing me Sgt Morales and none has done nothing about it and the only thing I ask MR Piscioti, To keep him away from me so I could do my job.

On 8/30/22 was my turning point when Capt Thomas Corrae State to me that I was a Old lady

On 8/30/22 After A few hours ~~that~~ Capt Thomas Came back to my work area stated again I Don't why MR Piscioti does not like you.

Sgt 2 Morales  
Officer's Signature

Dated: 9/2/22

HR Page 4

9/2/22

## Officer's Statement:

AT the time when Capt Thomas Correa Stated that to me I knew that I had to Retain A layer.

On 8/31/22 Approx 0810 AM MR Mark Morales Ask me To come up to the OFFICE. MR Piscioti and Morales and Capt Correa Was the OFFICE meeting began with me Sgt Z. Morales MR Piscioti Started to talk tell OF All Promotions that went After he was done

The only thing I wanted To know why MSgt R. Ronald Johnson got promoted To Lieutenant he still working with me on a higher rank For him to keep harassing me. No Answer From MR Piscioti Conversation why MR Piscioti like me and told him it came From Capt Thomas Correa.

I went to the OFFICE because I was Ask To come up I don't why has gone this far.

I work 30 years never had a problem on my record Been A Captain for 4 years

All the agencies in FPS Brooklyn and 26 Federal

FPS FBI ICE SSA Labor Dep UNCI'S All

Apprecate my work ethics

I just want harassment to stop

I know A woman, middle age and Hispanic please HR looking in Previous Charges and these new ones. Thank you for anything HR could do

Sgt Zuhra Morales  
Officer's Signature

Dated: 9/2/22

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