

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented to: Agency(ies) Charge No(s):

☐ FEPA
☒ EEOC

and EEOC

State or local Agency, if any

Name (indicate Mr. Ms. Mrs.)

Mr. Jonas Hierro

Home Phone (Incl. Area Code)

Date of Birth

Street Address

City, State and ZIP Code

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

Parkchester DPS LLC

No. Employees, Members

65

Phone No. (Include Area Code)

718-823-4411

Street Address

2000 East Tremont Avenue

City, State and ZIP Code

Bronx, NY 10462

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest (ADEA/EPA)

Latest (All)

08/26/2024

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)):

See attached complaint.

[] 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.

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

06/17/25

Date

Jonas Hierro (Jun 17, 2025 17:53 EDT)

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

X

Claimant,

- against -

PARKCHESTER DPS LLC and
PARKCHESTER PRESERVATION
MANAGEMENT LLC.

Respondents.

X

EEOC CHARGE OF DISCRIMINATION: NARRATIVE STATEMENT

Charging Party Jonas Hierro hereby alleges the following against Respondent Parkchester DPS LLC and Parkchester Preservation Management LLC (collectively “Parkchester Police Department” or “PPD”) in support of his claims of unlawful discrimination and retaliation on the basis of his race (Dominican), gender/sex (male), and his perceived sexual orientation (homosexual).

NATURE OF THE CASE

1. Respondent PPD is an organization that claims to be dedicated to the protection of Parkchester's residents and community. Behind the scenes, they fail to protect their own employees from egregious harassment, assault, and retaliation.
2. The toxic and dangerous culture at PPD resulted in Charging Party, Jonas Hierro, being subjected to disturbing unlawful mistreatment that included him being sexually assaulted with weapons and pepper sprayed in enclosed spaces. Making matters worse, the offenders were PPD employees that were tasked with training and/or supervising Mr. Hierro. While subjecting Mr. Hierro to such disgusting conduct, these employees directed discriminatory sexual harassing comments at Mr. Hierro, falsely implying that he was gay or bisexual, making other sexually

obscene statements, and disparaging Mr. Hierro's Dominican ethnicity.

3. Ultimately, fearing for his safety, Mr. Hierro complained about the sexual harassment and assaults. Rather than appropriately addressing his concerns, PPD sought to brush these incidents under the rug. In doing so, upon information and belief, PPD deleted surveillance footage that showed Mr. Hierro being assaulted, including footage of Mr. Hierro being pepper sprayed in an elevator.

4. After complaining, Mr. Hierro was targeted with retaliation. He was labeled a "snitch," a "bitch," and a "rat" and was shunned. Making matters worse, PPD engaged in a campaign of intimidation through which they subjected Mr. Hierro to unfair disciplinary measures in an effort to push him out of PPD.

5. Rather than allow such a toxic working environment to continue, Mr. Hierro was steadfast in standing up for himself and for what was right. Mr. Hierro complained about the retaliation he continued experiencing throughout his employment, but the very supervisors and Human Resources ("HR") representatives that should have protected him turned against him and even acknowledged they would make no efforts to investigate his continued retaliation because it would cause too much drama within the department.

6. After seeing Mr. Hierro would not back down and resign, PPD launched a biased investigation into purported policy violations for conduct Sargeant James Frye instructed him to engage in that other officers engaged in with no consequence. Shortly after the investigation, PPD terminated Mr. Hierro based on a baseless accusation that Mr. Hierro engaged in "inappropriate contact with a tenant of the Parkchester Condominium."

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

7. Charging Party Jonas Hierro is an adult resident of Bronx County, New York,

who was, during all times relevant hereto, employed by Respondents PPD.

8. Respondent Parkchester DPS LLC (“Parkchester DPS”) is duly incorporated and existing under the laws of the State of New York and licensed to do business in the State of New York. Parkchester DPS maintains its principal place of business at 2000 East Tremont Avenue, Bronx, New York 10462. Together with Parkchester Preservation Management LLC, Parkchester DPS operates as a single business enterprise providing public safety and law enforcement services to the Parkchester residential community in Bronx, New York.

9. Respondent Parkchester Preservation Management LLC (“Parkchester Management”) is duly incorporated and existing under the laws of the State of New York and licensed to do business in the State of New York. Parkchester Management maintains its principal place of business at 2000 East Tremont Avenue, Bronx, New York 10462. Parkchester Management owns and operates a private residential community consisting of residential buildings and commercial spaces. Together with Parkchester DPS, Parkchester Management operates as a single business enterprise providing public safety and law enforcement services to the Parkchester residential community in Bronx, New York.

10. Upon information and belief, Respondent Parkchester DPS employs approximately 65 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Charging Party is proceeding herein.

11. Upon information and belief, Respondent Parkchester Management employs approximately 44 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Charging Party is proceeding herein.

Material Facts

I. Mr. Hierro's Aspirations to Have a Career in Law Enforcement lead him to Start his Career as a Peace Officer

12. Charging Party Jonas Hierro is a 24-year-old Dominican American man living in Bronx, New York.

13. On or about June 19, 2023, he began working for Respondents PPD as a Security Guard.

14. Mr. Hierro's first two months working for Respondents PPD went smoothly. He worked the shifts and posts he was assigned to as needed, alternating between the 8 am – 4 pm shift ("Second Shift") and the 4 pm – 12 am shift ("Third Shift"). As a new hire, Mr. Hierro was often posted at a booth with unsanitary conditions including maggots (the "Maggot Booth"). Mr. Hierro was one of the last hires as Respondents PPD were assembling enough new recruits to begin a training program ("PPD Academy"), after which recruits were routinely promoted to Special Patrolmen.

15. Mr. Hierro's supervisors were Sargeant Frye, Lieutenant Victor Lugo, and Lieutenant Michael Johnson, who all worked for Respondents PPD.

16. Officer Nadem Mahabir and Officer Anthony Garcia, both Field Training Officers, worked the Third Shift, which was known among the Officers as the "4-12 family." They portrayed themselves as being welcoming and close-knit with the other officers assigned to their shift. As Mr. Hierro would soon discover, they were anything but.

17. In late July 2023, Mr. Hierro and Officer Garcia worked their first shift together.

18. Mr. Hierro was still getting to know his coworkers at this point and felt optimistic about making a connection with Officer Garcia, a Field Training Officer who others looked up to as a role model.

19. During that shift, Officer Garcia told Mr. Hierro that he was arrested in the past for assaulting his girlfriend while he was in the New York City Police Department (“NYPD”) Academy, which resulted in him being discharged from the NYPD.

20. After he told Mr. Hierro about his arrest, Officer Garcia pulled up a newspaper article on his phone covering his arrest and showed it to Mr. Hierro.

21. In or around mid-August 2023, Mr. Hierro began the PPD Academy.

22. Respondents PPD held PPD Academy in the basement of a building located at 1555 Unionport, and Mr. Hierro and the other new hires were temporarily moved to a locker room in that building. Among the topics PPD Academy covered, Mr. Hierro learned about penal law and the different types of force, and he completed the training ranked third in his class.

23. In or around August or September 2023, Mr. Hierro graduated from the PPD and was assigned a locker in the PPD locker room.

24. Mr. Hierro’s locker was to the left of Officer Garcia’s. Mr. Hierro became more intimately acquainted with Officer Garcia than he would have liked.

II. Mr. Hierro Experiences a Hostile Work Environment Almost Immediately After Graduating Police Academy

25. In or around October 2023, Mr. Hierro transitioned to the Patrolman role on the Third Shift and Officer Mahabir was assigned to be his mentor.

26. Around this time, in or around October 2023, Officer Garcia began his campaign of sexual harassment, gender discrimination, and/or perceived sexual orientation discrimination against Mr. Hierro.

27. Each day, Officer Garcia would play music in the locker rooms while the officers were changing.

28. Officer Garcia would twerk against Mr. Hierro’s thighs while Mr. Hierro was

undressed and changing into his uniform, as well as slap and grope Mr. Hierro's buttocks. Despite Mr. Hierro's attempts to get Officer Garcia to stop targeting him, the unlawful conduct continued.

29. Mr. Hierro's Field Training Officer, Officer Mahabir, joined in the harassment by grabbing Mr. Hierro by the waist with his fingers interlocked to prevent Mr. Hierro from leaving, and humping him from behind in the locker room for their colleagues to see. Mr. Hierro tried unsuccessfully to get the conduct to stop.

30. In or around late November 2023, Officer Garcia's conduct began to escalate when he tried forcing his finger up Mr. Hierro's anus, over his underwear.

31. Over the course of December 2023, Officer Mahabir, Officer Garcia, and Officer Abelardo Perez escalated their campaign of sexual harassment, gender discrimination, perceived sexual orientation discrimination, and encouraged other officers to participate. Their conduct included, but was not limited to:

- a. Shoving their fingers up Mr. Hierro's clothed anus;
- b. Twerking against Mr. Hierro's groin and rubbing their genitals on him;
- c. Pepper spraying Mr. Hierro in enclosed spaces such that he could not breathe or see;
- d. Flashing strobe lights in Mr. Hierro's eyes in a dark room to make it hard for him to see;
- e. Attempting to penetrate Mr. Hierro's anus with a collapsible baton while interviewing a tenant about an unrelated complaint;
- f. Sending Mr. Hierro sexual messages via Instagram such as "do you have a fat dick?" and "You wanna eat my ass?"
- g. Publicly humiliating Mr. Hierro.

32. The officers did this in private, in the presence of other officers, and in front of tenants while carrying out their official duties.

33. In December 2023, Mr. Hierro verbally complained to Sargeant Frye about Officer Mahabir's, Officer Perez's, and Officer Garcia's harassing conduct. Sargeant Frye told Mr. Hierro not to worry and that he would handle it. Sargeant Frye "handled it" by assigning Officers Garcia, Mahabir, and Perez to different posts during the same shift. They would abandon their posts to continue harassing Mr. Hierro. Emboldened by the lack of consequences for their behavior, the conduct worsened.

34. Nonetheless, in or around December 2023, Officer Mahabir shoved Mr. Hierro into an elevator, pepper sprayed him, and attempted to close the elevator door. Mr. Hierro, choking and temporarily blinded by the pepper spray, acted quickly and was able to prop the door open with his foot and breathe clean air from the doorway. Once again, Mr. Hierro complained to Sargeant Frye. Once again, Sargeant Frye told Mr. Hierro not to worry because he would handle it. Once again, Sargeant Frye took no meaningful action.

35. Just a few days after complaining, Officer Mahabir abandoned his post to pepper spray Mr. Hierro again. Mr. Hierro encountered Officer Mahabir blocking the exit on his way to the roof and Officer Mahabir pepper sprayed Mr. Hierro and jumped aside. Mr. Hierro stumbled onto the roof choking, rubbing his eyes, gasping for fresh air. There were several officers who witnessed this, one of whom laughed and asked Officer Mahabir if he had pepper sprayed Mr. Hierro again.

36. On December 19, 2023, Officers Perez and Mahabir took their flashlights out of their holsters and repeatedly flashed them in Mr. Hierro's face while laughing and videotaping it.

37. Further, in or around December 2023, Officer Perez asked Mr. Hierro, who is

Dominican, if all Dominican men are gay, insinuating that he thought Mr. Hierro was gay, and further noted that he thought this because many Dominican men wear tight clothes.

38. In late December 2023, after the PPD holiday party, Officer Garcia requested to follow Mr. Hierro on Instagram so he could send Mr. Hierro photographs he took at the holiday party.

39. On December 26, 2023, Mr. Hierro posted on Instagram in his PPD uniform. The picture was a headshot that did not reveal which police department Mr. Hierro worked for.

40. At approximately 3:56 AM on December 26, 2023, Officer Garcia commented on Mr. Hierro's post: (1) "Do you like ass?" (2) "Do you have a fat dick?" (3) "How big is your asshole?" (4) "You wanna eat my ass?".

41. Mr. Hierro did not reply to any of these comments and promptly deleted this post.

42. Shortly after the Instagram post, in January 2024, Officer Garcia continued to sexually harass Mr. Hierro when he was changing by doing the following:

- a. Twerking against Mr. Hierro's groin region;
- b. Groping Mr. Hierro's buttocks;
- c. Smacking Mr. Hierro's buttocks;
- d. Trying to shove his finger up Mr. Hierro's clothed anus.

43. Mr. Hierro regularly objected to Officer Garcia behaving in this way by trying to shove him away and telling him to "stop" and "stop playing." Officer Garcia, however, did not stop.

44. Mr. Hierro resorted to putting on his uniform pants at home so he would not have to change in the locker room. Nonetheless, Officer Garcia continued to twerk on Mr. Hierro's crotch area.

III. PPD Fails to Address the Unlawful Conduct Escalating to Physical and Sexual Assaults During Work Hours and At Work

45. In or around January 2024, Officer Mahabir assaulted Mr. Hierro with a collapsible baton. Mr. Hierro, along with Officer Mahabir and Officer Perez, responded to a tenant complaint involving package theft. Mr. Hierro stood at the tenant's door to interview the tenant. Officer Mahabir stood behind him, and Officer Perez to his right. During the interview, Officer Mahabir opened his collapsible baton and shoved it forcefully into Mr. Hierro's rectal area, lifting him onto his tiptoes. Mr. Hierro could not react and had to maintain composure because he was interviewing the tenant about a complaint. Mr. Hierro was shocked and felt violated and humiliated. After this incident, Mr. Hierro, asked Officer Mahabir why he did that. Officer Mahabir did not respond.

46. After the tenant left, Mr. Hierro told Officers Mahabir and Perez "Don't you ever do that shit again," which is captured on an audio recording.

47. A few days later, Mr. Hierro complained about this incident and the December 2023 incident to Lieutenant Phil Centinaro, the Integrity Control Officer who was tasked with investigating officer misconduct and reviewing body worn cameras.

48. Mr. Hierro provided him with the specific date and time of the December 2023 elevator incident and the officers who were present so he could review the audio recordings.

49. When Mr. Hierro went back to review the video footage that captured the incident, all that was shown was Mr. Hierro entering and exiting the elevator without audio. Thus, Mr. Hierro believes that the video was altered to make it appear that the incident never occurred.

50. Thus, in January 2024, Mr. Hierro was left no choice but to file a written complaint with HR Lieutenant Aida Haddock-Sanchez, the Head of Human Resources, outlining the unlawful torment he was suffering at the hands of his superiors and colleagues. When Mr.

Hierro first complained about Officer Garcia, Lieutenant Haddock-Sanchez began to cry, perhaps the first indication of what was to come.

51. Lieutenant Haddock-Sanchez and Sargeant Douglas Maresca investigated Mr. Hierro's complaint, which involved a recorded interview of Mr. Hierro. At the end of the investigation, they turned off the recorder and asked Mr. Hierro whether he wanted to press criminal charges or whether he wanted the officers fired. Mr. Hierro, taken aback by this question, told them that he trusted in their professional experience as HR professionals to make the right decision when it came to handling his complaint. In response, they told him that they would delete the video tape and "make it all go away."

52. As a result of the investigation, Officer Mahabir and Officer Garcia were suspended 3 days without pay, some of which overlapped with their regular days off. Officer Perez was never suspended.

53. Officer Perez was moved to the First Shift (12am-8am) and Officer Garcia was moved to the Second Shift (8am-4pm).

54. Mr. Hierro was on the Third Shift (4pm-12am), so he overlapped with Officer Perez in the locker room prior to his shift and with Officer Garcia in the locker room following his shift.

55. Officer Mahabir was terminated after his suspension.

56. At this point, Officer Garcia's and Officer Perez's retaliation against Mr. Hierro began.

IV. Mr. Hierro is labeled a "Snitch," a "Bitch," and a "Rat," and Gets Retaliated Against with Bad Reviews

57. In late January/early February 2024, Mr. Hierro's working environment became increasingly threatening. His coworkers began isolating him at work and his supervisors began

treating him negatively in retaliation for speaking up against Officer Mahabir and Officer Garcia. Such conduct included, but was not limited to, the following:

- a. Coworkers refusing to speak with Mr. Hierro or even acknowledge his existence;
- b. Coworkers, new hires, and tenants (including children) calling Mr. Hierro a “rat,” a “snitch,” and a “bitch;”
- c. Hanging a picture of a rat in Mr. Hierro’s locker;
- d. Being assigned to the Maggot Booth 2-3 times per week, a posting that is considered a punishment for other officers and assigned much less frequently;
- e. Receiving two negative reviews within a three-month period after having no reviews since being hired;
- f. Being scrutinized and disciplined for taking vacation and sick time;
- g. Being prohibited from taking bereavement for his father’s passing but allowing more junior employees to have paid bereavement leave; and
- h. Being passed over for promotion and facing a 7-month delay in what otherwise was supposed to have been a routine promotion.

58. In late January 2024, Mr. Hierro received his first performance review with an embarrassing score of around 2.6. Sargeant Frye told Mr. Hierro “This is only the first evaluation. By the second evaluation you should have met the requirements for promotion.” One of Mr. Hierro’s reviewers told Sargeant Frye that he would “take the writeup, I’m not working with that snitch.” Mr. Hierro later learned that the same reviewer told Sargeant Frye that he gave Mr. Hierro ratings of 2 and 3 with the hopes that he would get fired. Mr. Hierro understood this to be a

retaliatory review for reporting Officers Mahabir, Garcia, and Perez, because the reviewer had called him a “snitch.”

59. In the meantime, Mr. Hierro would be assigned to the Maggot Booth where he was posted alone during the third shift. The booth was dark, dirty, and had maggots in it. He would see Officer Garcia during shift changes, and Officer Garcia would not talk to him. Instead, whenever Mr. Hierro saw Officer Garcia and Officer Garcia was speaking with another officer, Officer Garcia would say something along the lines of “I have to watch what I say, there are too many snitches here.” Officer Perez would say things such as “I’m not teaching any new hires shit because they’ll fuck you” and “all these bitches” whenever Mr. Hierro was within earshot.

60. In a department of approximately 30 people on any given shift, only three individuals were willing to speak with Mr. Hierro after he had complained. Those three individuals would also experience retaliation by associating with Mr. Hierro. Because of this, it did not take long for new recruits to shun Mr. Hierro, refer to him as a “rat,” and avoid associating with him, even if they did not know the reason why.

61. In or around March 2024, Mr. Hierro’s father passed away. When he informed Respondents PPD, they insisted that he show them proof of his father’s passing and of their relationship. Even then, they said he would not be paid for his time off because he had been employed for less than one year. Mr. Hierro missed three of the seven days of funeral services for his father. On his second day out, Respondents PPD informed Mr. Hierro that he had no vacation or sick days and so he would be taking that time off without pay. Approximately one month later, a junior officer hired after Mr. Hierro was allowed to take paid bereavement for a family member who passed away.

62. In or around late April 2024, Sargeant Frye and Lieutenant Johnson gave Mr.

Hierro his second bad review in which he scored approximately 2.8. Lieutenant Johnson told Mr. Hierro: “This job is not for you. Find something else. Work at McDonald’s or something. I do not want you on my shift anymore because it is too hard to find a partner for you.”

63. Mr. Hierro instead stayed in the role because working in law enforcement had been a lifelong dream. He refused to believe that standing up for himself should be the reason to give up on that dream.

64. In or around May 2024, Officer Garcia was promoted. Although he had the same title, he was granted a step-up in privileges and seniority by handling social media and community engagement for Respondents PPD. Mr. Hierro perceives this as Officer Garcia’s career taking off while his own dwindled after making his complaint.

V. Management Sat Idly by as Retaliation Worsens, Refusing to Investigate Lest it Cause Drama While Mr. Hierro Continued to Suffer in an Unsafe Work Environment

65. On or around June 3, 2024, Mr. Hierro opened his locker and found himself face to face with a picture of a rat. He immediately complained in writing to Human Resources. In response, Lieutenant Haddock-Sanchez told him that she would not investigate it because it would create “too much drama” to interview the 30 potential officers who could have been the culprit. Mr. Hierro was left to continue working in an environment where his coworkers could openly threaten and intimidate him without fear of any repercussion.

66. In or around late June 2024, while Mr. Hierro was assigned to the Maggot Booth, two residents who appeared to be young girls around the age of fourteen, approached him and asked him whether he was “Officer Hierro.” After confirming that he was, the girls told him they were not supposed to talk to him because he was a “snitch.” Mr. Hierro asked who told them this, and they said it was another officer they call “Officer Habibi,” their “good friend” Officer Flores.

When Mr. Hierro complained to Human Resources about Mr. Flores's inappropriate disclosures to two underage tenants, rather than investigate the complaint against Officer Flores, they told Mr. Hierro to record the minors next time this happened. Mr. Hierro refused to do so, as he believed it to be inappropriate.

67. In or around late July 2024, Respondents PPD suspended Mr. Hierro without pay due to him taking a sick day on or around Saturday, July 27, 2024, without following protocol. Mr. Hierro followed the procedure that other officers followed, and that Sargeant Frye instructed him to follow. On a prior occasion, Mr. Hierro manually signed out and orally confirmed with Sargeant Frye that he was going home due to feeling unwell. Sargeant Frye then told him that he did not need oral confirmation and that he could simply sign out. This is the procedure that Mr. Hierro had followed for months and that he had observed other officers follow for months without penalty because it was the common practice in the workplace. The fact that Mr. Hierro was suspended for following a common practice shows that Respondents PPD were targeting him by unfairly enforcing employment policies against him.

68. On or about August 5, 2024, Sargeant Maresca, Lieutenant Haddock-Sanchez, and Officer Adam Mercado called Mr. Hierro to tell him he would be suspended without pay for another week pending their investigation.

69. On or about August 12, 2024, Sargeant Maresca told Mr. Hierro that his two-week suspension without pay was over, and that he was on standby until later that day.

70. Later that same day, Sargeant Maresca told Mr. Hierro that he would be suspended without pay for the rest of the day.

71. On or about August 26, 2024, Respondents terminated Mr. Hierro, allegedly due to "inappropriate contact with a tenant of the Parkchester Condominium," and notified him that

they “forwarded the information to the NYC Police Department as well as the Bronx District Attorney’s office.” Mr. Hierro was shocked to receive this letter, because he had no idea what they were referring to and yet he was being threatened with potential criminal charges. Based on the lack of evidence of his “inappropriate conduct” and PPD’s year plus campaign to harass, degrade, discriminate, and retaliate against Mr. Hierro, this termination was clearly pretext for further discrimination based on Mr. Hierro’s race, gender, sexual orientation, and perceived sexual orientation and retaliation for his protected complaints.

72. It is clear from the foregoing that Respondent has engaged in unlawful discrimination and retaliation on the basis of Charging Party’s race (Dominican), gender/sex (male), and his perceived sexual orientation (homosexual) in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, et seq., (“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, New York City Administrative Code §§ 8-107, et. seq. (“NYCHRL”).

73. As a result of Respondent’s actions, Charging Party feels extremely violated, degraded, victimized, embarrassed, and emotionally distressed and has suffered severe emotional distress, loss of income and earnings. Further, as a result of Respondent’s actions, Charging Party feels unsafe and has lost his confidence in his ability to trust and form interpersonal relationships.

74. Because of Respondent’s actions that have been malicious, willful, outrageous, and done with knowledge of the legion of the contrary, Charging Party demands punitive damages against Respondent.

75. Respondent’s flagrant disregard of the above-referenced laws evidences a pattern and practice of discrimination and retaliation that falls squarely within the EEOC’s investigatory

and enforcement statutory mandates to investigate, and enforce prohibitions against, discriminatory conduct in the workplace.