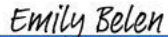


CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented to: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="margin-top: 5px;"> <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. Emily Belen	Home Phone (Incl. Area Code) <div style="background-color: black; width: 100%; height: 40px;"></div>	Date of Birth <div style="background-color: black; width: 100%; height: 20px;"></div>
Street Address _____ City, State and ZIP Code _____ <div style="background-color: black; width: 100%; height: 20px;"></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.)		
Urban Resource Institute	No. Employees, Members <div style="text-align: center; font-weight: bold;">236</div>	Phone No. (Include Area Code) <div style="text-align: center; font-weight: bold;">646-588-0030</div>
Street Address _____ City, State and ZIP Code _____ 205 East 42 Street 13th Floor, New York, NY 10017		
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 <div style="background-color: black; width: 100%; height: 40px;"></div>
CONTINUING ACTION		
THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)): <div style="text-align: center; padding: 20px;"> <p>(Please find the attached narrative statement of facts).</p> <p>Charging Party is represented by: Erica Healey-Kagan of Filippatos PLLC</p> <p>425 Madison Ave, New York, NY</p> <p>ehealeykagan@filippatoslaw.com</p> <p>212-202-0234 ext. 414</p> </div>		
[] 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="display: flex; justify-content: space-between; align-items: flex-end; margin-top: 20px;"> <div style="text-align: center;"> 01/08/2025 _____ Date </div> <div style="text-align: center;">  <small>Emily Belen (Aug 1, 2025 14:18:44 EDT)</small> _____ 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

..... X
EMILY BELEN,

Claimant,

- against -

**EEOC CHARGE
OF DISCRIMINATION:
NARRATIVE STATEMENT**

URBAN RESOURCE INSTITUTE,
Respondent.
..... X

Claimant Emily Belen hereby alleges the following against Respondent Urban Resource Institute (“URI”) in support of her claims of discrimination and harassment based on her race/national origin (Hispanic) as well as retaliation and interference with her disability and medical leave rights against URI and certain individual wrongdoers, including Neptune Darby, Senior Director, and Leslie Samuel-Young, Senior Vice President (“VP”).

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

1. At all times relevant hereto, Charging Party Emily Belen (“Charging Party” or “Ms. Belen”) has been a resident of the [REDACTED]

2. At all times relevant hereto, Urban Resource Institute (“Respondent,” “URI” or the “Institute”) was and is a domestic violence service organization maintaining its principal place of business at 205 East 42nd Street, 13th Floor, New York, NY 10017.

3. Upon information and belief, Respondent employs more than fifteen (15) individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Charging Party is proceeding herein.

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

Material Facts

I. Ms. Belen's Professional Background and Long-Term Service to URI

5. Ms. Belen is a dedicated professional who has devoted nearly 25 years of her career to URI, beginning her employment on October 10, 2000.

6. Throughout her long tenure, Ms. Belen has consistently demonstrated her commitment to URI's mission as a domestic violence service organization, often going above and beyond her designated responsibilities as a Program Assistant.

7. Ms. Belen's primary duties included administrative work such as monthly billings and updating databases, earning a salary of \$47,000 per year without bonus or commission.

8. Ms. Belen has been a reliable and versatile employee, frequently stepping in to fulfill multiple roles beyond her job description, maintaining operations and ensuring continuity of service for URI's clients during periods of staff turnover and leadership gaps.

9. Her extensive institutional knowledge and dedication made her an invaluable asset to the organization, particularly during periods of transition.

10. Ms. Belen is of Hispanic descent and suffers from diabetes, a serious medical condition that qualifies as a disability under applicable laws.

II. URI Perpetuates a Systemic Pattern of Race and National Origin-Based Discrimination Against Ms. Belen and Other Hispanic Employees

11. Throughout her employment, Ms. Belen experienced ongoing discrimination and harassment based on her race, national origin (Hispanic), and disability.

12. URI blatantly discriminated against Ms. Belen and other Hispanic employees based on their Hispanic background, consistently favoring Black employees while subjecting Hispanic employees to differential treatment.

13. As early as 2022, Ms. Belen's hard work was being ignored. In a performance review she received that year, Ms. Belen was given a passing review which completely ignored the additional duties she had undertaken beyond her designated duties.

14. She was surprised to see that she did not receive any of the additional merits URI was giving to staff members despite her high-level performance and hard work.

15. In December 2023, Ms. Belen began experiencing discrimination related to compensation when she sent multiple communications to Leslie Samuel-Young, Senior Vice President, regarding a \$5,000 salary increase that had been endorsed by Maria Garay, Ms. Belen's former supervisor, in October 2023.

16. On December 6, 2023, Ms. Belen followed up with Ms. Samuel-Young via email, with copies to Amanda Eckhardt, Chief Program Officer, and Tiffany Singh, Director of People & Culture, requesting the status of this previously approved salary increase.

17. Despite these formal communications, Ms. Belen received no response, and by January 5, 2024, when the increase was not reflected in her paycheck, she again complained to Ms. Samuel-Young, who continued to ignore her legitimate requests.

18. Ms. Belen's attempts to resolve this matter extended through March 1, 2024, when she inquired about whether the increase would be retroactive to October 2023 and again received no substantive response.

19. In March 2024, Ms. Belen was required to perform the duties of the Program Director position, which had been vacant since October 2023.

20. Despite effectively fulfilling these responsibilities in addition to her regular duties, when Ms. Belen requested to be officially given the title of Assistant Program Director, her request was ignored.

21. Instead, she was forced to take on not only the Program Director role but also Case Manager and Housing Specialist positions in addition to her Program Assistant role—all without appropriate compensation for these additional responsibilities. In her Housing Specialist capacity, she was placed under significant pressure by Ms. Young and residents to ensure that housing packets were meticulously prepared and submitted to HRA by strict deadlines, as any delay could result in residents losing critical opportunities for permanent housing placement. This housing application process proved to be extremely meticulous and tedious, requiring careful attention to numerous documentation requirements and procedural steps.

III. Pattern of Discrimination Against Hispanic Residents and Staff

22. Ms. Belen observed that after business hours, Black residential specialists who worked the night shift would discriminate against Latina residents.

23. These specialists would consistently refer to Hispanic residents as the “Hispanic ones” or “Spanish ones” rather than using their names, a dehumanizing practice that Ms. Belen found troubling.

24. When Hispanic residents approached Ms. Belen with complaints about this treatment, she appropriately directed them to file formal complaints.

25. However, Senior VP Leslie Samuel-Young clearly did not appreciate Ms. Belen’s advocacy on behalf of these residents, and the issues were consistently “brushed under the rug” without proper resolution.

26. On December 4, 2023, Ms. Belen forwarded a complaint from resident Elizabeth Frias to Ms. Samuel-Young regarding Rochester, an African American Residential Specialist who had made Ms. Frias and her son feel unsafe in the facility.

27. Just four days later, on December 8, 2023, Ms. Belen reported two additional

complaints from Hispanic residents (Ms. Davila and Ms. Frias) to Ms. Samuel-Young regarding disrespectful treatment by two African American staff members – Ms. Davis and Ms. Rochester.

28. Despite these formal complaints, Ms. Samuel-Young failed to take any remedial action, effectively condoning the discriminatory environment.

29. On March 25, 2024, Ms. Belen sent a complaint email to Ms. Samuel-Young regarding two Hispanic residents – Ms. Abarca and Ms. Agudelo – who reported being discriminated against, denied access to cutlery, and prevented from using the water cooler by Ms. Davis, an African American Residential Specialist Supervisor.

30. Most alarmingly, on May 7, 2024, Ms. Belen sent a complaint email regarding three Hispanic residents who had filed formal grievances reporting that another resident had been “aggressively screaming racial slurs and cursing at them,” saying “these Spanish motherf*ckers need to go!” in clear violation of URI’s stated zero-tolerance policy for threatening or violent behaviors.

31. Despite the severity of these allegations and the attached written grievances, Ms. Samuel-Young and management once again failed to take appropriate corrective action.

IV. Intensified Discrimination and Harassment by Charnell Neptune Darby

32. The discriminatory treatment of Ms. Belen intensified in July 2024 when Ms. Samuel-Young brought in Charnell Neptune Darby, a Senior Director (Black), to the office.

33. Ms. Darby immediately began subjecting Ms. Belen to excessive micromanagement, sending her numerous emails and imposing unreasonable timelines for her work tasks, something she did not do with other Black employees.

34. According to another Senior Director, Ms. Samuel-Young had explicitly instructed Ms. Darby to put Ms. Belen “in her place”—a clear indication that the heightened scrutiny was

not based on legitimate performance concerns but rather was motivated by discriminatory animus.

35. At her very first staff meeting on July 11, 2024, Ms. Darby openly announced to all staff that she was there to “bring structure” and “clean house within six months,” warning that employees who did not “conform” would not remain part of URI.

36. Just weeks later, on August 1, 2024, Ms. Darby began sending Ms. Belen emails after working hours (7:45 PM), imposing unreasonable demands regarding monthly billing deadlines and explicitly ordering Ms. Belen to arrive at work on time to complete these tasks by Ms. Darby’s arbitrary deadlines.

37. Upon information and belief, none of the other Black employees were being subjected to such arbitrary and tight deadlines.

V. Ms. Belen Engages in Protected Activity

38. In June 2024, when Ms. Samuel-Young asked Ms. Belen to write a statement about an incident involving a terminated Black case manager, Ms. Belen honestly explained that she had not been present for the entire altercation and suggested that Juan Medina, a colleague who had witnessed more of the incident, would be better positioned to provide a complete statement.

39. Rather than respecting Ms. Belen’s integrity, Ms. Samuel-Young visited Ms. Belen’s work site a week later and threatened her with a “final warning” if she did not write a statement—a clear attempt to pressure Ms. Belen into providing potentially misleading or incomplete testimony.

40. On June 20, 2024, Ms. Samuel-Young personally came to Ms. Belen’s work site and accused her of being “insubordinate,” threatening her with a “final warning” if she did not comply with the directive to write an incident report.

41. Under this explicit threat to her employment, Ms. Belen was coerced into providing

a statement the following day.

42. In August 2024, Ms. Belen properly followed protocol by complaining to HR about Ms. Darby's micromanagement.

43. However, rather than addressing her concerns, HR dismissively told Ms. Belen to "resolve the issue" herself, excusing Ms. Darby's behavior by noting that she was "new to the office."

44. On August 5, 2024, Ms. Belen sent an email detailing her concerns about Ms. Darby's treatment to the group People & Culture email address, specifically copying Elyse Barbell, VP of People & Culture.

45. In September 2024, Ms. Belen was compelled to send another email to HR regarding a false allegation made against her by Ms. Williams, a Residential Specialist.

46. On September 16, 2024, Sonia Rojas, a Custodian, with the agreement of Maritza Torres, Cook; Rosemary Gonzalez, Housekeeper; and Ms. Belen, sent a formal complaint email to Elyse Barbell, VP of People & Culture, explicitly citing workplace discrimination and harassment against Hispanic employees.

47. Tellingly, neither Ms. Barbell nor Beverly Riddick, Chief Operations Officer, responded to this complaint, effectively dismissing the collective grievances of multiple Hispanic employees.

VI. Discrimination Based on Disability and Interference with FMLA Rights

48. By September 2024, the extraordinary stress caused by her excessive workload, combined with the targeted discrimination and harassment, began to significantly exacerbate Ms. Belen's diabetes symptoms.

49. Following her physician's recommendation, Ms. Belen properly requested and was

approved for FMLA leave and short-term disability benefits beginning on September 19, 2024.

50. Her initial leave was scheduled to end on December 27, 2024. However, as that date approached, Ms. Belen's doctor determined that her medical condition had not sufficiently improved to allow her to return to work.

51. On December 9, 2024, Ms. Belen sent an email to the Benefits Team formally requesting an extension of her short-term disability leave as a reasonable accommodation under the ADA.

52. On December 30, 2024, Ms. Belen promptly provided the necessary medical certification indicating she should remain on leave until March 2025.

53. Despite receiving proper medical documentation supporting Ms. Belen's extended leave, on January 9, 2025, URI sent Ms. Belen an email informing her that her position had been filled and that if she wanted to return to work at the Institute, she would need to reapply.

54. This action constitutes a clear violation of Ms. Belen's rights under the FMLA, which guarantees eligible employees the right to return to the same or equivalent position upon returning from protected leave.

VII. False Performance Review and Continued Retaliation

55. While Ms. Belen was focusing on her health during her leave, she discovered that Ms. Darby had been assigned to complete her performance review for the period of July 2023 to June 2024—despite the fact that Ms. Darby had not joined URI until July 2024.

56. The review contained false statements about Ms. Belen's performance and gave her an unjustifiably low rating that did not reflect her actual work performance.

57. On February 4, 2025, Ms. Belen filed a formal grievance regarding this fraudulent performance review, specifically noting that Ms. Darby was not employed at URI during the

review period.

58. Despite multiple follow-up inquiries, URI failed to provide Ms. Belen with a substantive response to her grievance.

59. Most disturbingly, after Ms. Belen filed her grievance challenging the fraudulent performance review, URI initially claimed to delete the review from their system but later it was discovered that the negative comments remained, with only the manager's name changed.

60. When Ms. Belen continued to challenge the unfair performance review, URI's response further demonstrated their discriminatory intent and dismissive attitude toward her legitimate concerns.

61. In response to Ms. Belen's complaints about the performance review, URI stated: "The PEP that was just paid is for FY24 and your current status has no bearing on your FY24 performance (we are now in FY26). FY24 is closed. After speaking with your manager, we believe your score is a fair assessment of your performance."

62. This response was particularly troubling because it doubled down on the fraudulent review conducted by Ms. Darby, who was not even employed during the review period, and dismissed Ms. Belen's legitimate concerns about the accuracy of the assessment.

63. URI further delayed addressing Ms. Belen's concerns by stating: "When Ms. Young returns from leave in two weeks, I will discuss with her who is best positioned to assess your FY25 performance and will make arrangements for your FY25 PEP to be completed by a supervisor who has direct knowledge of your work."

64. URI proposed scheduling a meeting "in early September" due to "upcoming vacations," effectively postponing any resolution of Ms. Belen's discrimination complaints for months while she continued to suffer the effects of the discriminatory treatment.

65. Additionally, URI claimed they were “under the impression” that Ms. Belen’s accommodation was only “through June 30th,” demonstrating their lack of attention to her medical needs and accommodation requests.

VIII. Denial of Reasonable Accommodation and Continued Retaliation

66. Despite Ms. Belen’s doctor clearing her for full-time remote work due to her diabetes, URI initially offered only a part-time remote position, which would result in significant financial hardship.

67. When Ms. Belen requested clarification about full-time work, HR provided contradictory responses, first stating no full-time remote positions were available, then later claiming she could work full-time.

68. This inconsistent communication pattern created additional stress and uncertainty for Ms. Belen while she was trying to manage her medical condition.

69. Throughout this process, URI consistently treated Ms. Belen’s discrimination complaints as secondary issues to be “put on the back burner” rather than serious allegations deserving proper investigation.

70. The pattern of retaliation continued with URI’s refusal to provide clear information about her employment status, compensation, or the resolution of her discrimination complaints.

IX. Continued Isolation and Retaliatory Treatment in Operations Department

71. When Ms. Belen first started working in the Operations Department under Colby White, Operations Manager, Ms. White mentioned during a verbal Teams conversation that an introduction email would be sent to the Senior Facility Directors (“SFDs”) and Facility Directors (“FDs”).

72. Since Ms. Belen started working in the department, she had no interaction with the

SFDs or FDs until July 21, 2025, when Ms. White assigned her a daily task that requires daily contact with them.

73. On July 18, 2025, Ms. Belen sent Ms. White a message through Teams asking her to please send the team an introductory email, but Ms. White ignored her request and wrote to her about something else entirely.

74. Later that day or the next day, when Ms. Belen called Ms. White to ask a question about the new task (Daily Apartment Turnover report) that had been assigned to her, she took the opportunity to ask over the phone if Ms. White would be sending the introduction email to the staff.

75. Ms. White's response was that the SFDs and FDs were "all aware" of who Ms. Belen was because it was discussed during their weekly meeting and that an email would be sent.

76. Despite this assurance, no introductory email was ever sent to the team.

77. This new task involves Ms. Belen having to call and email the SFDs and FDs on a daily basis, yet she was never properly introduced to them, creating an uncomfortable and unprofessional work environment.

78. Ms. Belen has been forced to email the team members daily without proper introduction, which she believes is a deliberate isolation tactic by URI.

79. Although Ms. White is being outwardly professional and "pleasant," Ms. Belen cannot help but feel uncomfortable and believes this deliberate failure to provide a proper introduction to her colleagues is part of URI's continuing pattern of retaliation against her for engaging in protected activity.

80. This isolation tactic serves to undermine Ms. Belen's professional credibility and effectiveness in her role, making it more difficult for her to perform her job duties and maintain

professional relationships with colleagues.

81. Based on the foregoing discussion, it is clear that Respondent has discriminated and retaliated against Charging Party on the basis of her race, national origin, disability, and 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 (“Section 1981”); the Family and Medical Leave Act, 29 U.S.C. §§ 2601 et seq. (“FMLA”); the Americans with Disabilities Act, 42 U.S.C. §§ 12101 et seq. (“ADA”); 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”), which, together, give rise to a compendium of damages, including compensatory damages based on lost wages and emotional distress, as well as punitive damages, interest, attorneys’ fees, and legal costs.