

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.) 		Home Phone (Incl. Area Code) Email: 	
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 Manipal Education Americas, LLC/American University of Antigua		No. Employees, Members 155	
Street Address 115 Broadway, 5th Floor, New York, New York 10006		City, State and ZIP Code 115 Broadway, 5th Floor, New York, New York 10006	
DISCRIMINATION BASED ON (Check appropriate box(es).) ☒ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN ☒ RETALIATION ☐ AGE ☐ DISABILITY ☒ OTHER (Specify below.) GENDER		DATE(S) DISCRIMINATION TOOK PLACE Earliest (ADEA/EPA) Latest (All) February 26, 2025 CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)): (Please find the attached narrative statement of facts). Charging Party is represented by: Erica Healey-Kagan of Filippatos PLLC 425 Madison Ave, New York, NY ehealeykagan@filippatoslaw.com 212-202-0234 ext. 414			
☐ 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. 10/9/2025 Date		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

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

-----X

[REDACTED]

Claimant,

**EEOC CHARGE
OF DISCRIMINATION:
NARRATIVE STATEMENT**

-against-

MANIPAL EDUCATION AMERICAS, LLC/
AMERICAN UNIVERSITY OF ANTIGUA,

Respondent.

-----X

Claimant [REDACTED] ("Charging Party" or "[REDACTED]" hereby alleges the following against Respondent Manipal Education Americas, LLC / American University of Antigua ("MEA/AUA" or the "Company") in support of her claims of discrimination, harassment, and retaliation based on her gender, race, and parental status as well as interference with her FMLA rights and whistleblower retaliation claims:

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

1. At all times relevant hereto, Charging Party [REDACTED] ("Charging Party" or "[REDACTED]" [REDACTED] has been a resident of the [REDACTED]
2. At all times relevant hereto, Manipal Education Americas, LLC / American University of Antigua ("Respondent" "MEA/AUA" or the "Company") was and is an international for-profit organization maintaining its principal place of business at 115 Broadway, 5th Floor, New York, New York 10006.
3. Upon information and belief, Respondent employs approximately 155 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. [REDACTED] Professional Background and Experience

5. [REDACTED] is a strategic Human Resources executive with over 15 years of progressive experience across multiple industries.

6. While serving as Vice President (“VP”) of Human Resources (“HR”) at Manipal Education Americas, LLC / American University of Antigua since 2013, [REDACTED] manages both U.S. and global HR operations, providing strategic leadership in workforce planning, global compensation, and organizational development.

7. Her achievements include implementing a global job architecture framework, enhancing employee retention, and launching a wellness program serving domestic employees, Faculty and AUA students.

8. Previously, as Director of HR at Synergy Homecare, she led multi-location HR strategy while managing compensation, benefits, and talent acquisition to support business growth.

9. [REDACTED] HR expertise was further developed at a law firm, Davis Polk & Wardwell, where she served as a Benefits and Compensation Specialist administering firm-wide benefits programs, conducting market analysis, and processing payroll operations.

10. [REDACTED] leadership extends to employee relations, compliance oversight, and serving as plan administrator for company retirement programs, ensuring adherence to ERISA requirements.

11. [REDACTED] holds a Bachelor’s degree in Business Administration/Management from St. John’s University and maintains SHRM-CP certification.

12. Her diverse professional competencies include global compensation strategy, executive rewards, organizational development, talent acquisition, and HR technology implementation, complemented by active membership in the SHRM Executive Network and Women in Leadership Institute.

II. [REDACTED] Joins MEA/AUA

13. After building a career in HR management, [REDACTED] began her employment with MEA/AUA in 2013 as a Payroll & Benefits Coordinator with a starting salary of \$45,000.

14. Through her exceptional work performance and dedication, [REDACTED] steadily advanced within the organization.

15. Due to her excellent performance, [REDACTED] was promoted to Payroll and Benefits Manager in or around 2015, then to Director of HR in 2017, followed by Executive Director of HR in 2018-2019, Associate VP of HR in 2019, and finally to VP of HR in 2021.

16. At the time of her termination, [REDACTED] base salary was \$210,000.

17. Throughout her tenure, [REDACTED] consistently demonstrated her professionalism, and dedication to MEA/AUA, even in the face of egregious discrimination, harassment, and retaliation.

18. As VP of HR, [REDACTED] demonstrated exceptional leadership abilities, which were recognized through her inclusion in the President's Council, a leadership group comprising senior executives.

19. Notably, [REDACTED] was the only female among eight members of this prestigious group, which included Dr. Peter Bell, President (white male), Sheikh Sadiq, Senior Vice President of Strategy & Operations Consultant (Indian male), Prabhakaran (Prabhu) Marudheri, Chief Financial Officer ("CFO") (Indian male), Craig Hauser, Senior Vice President of Academic

Administration (white male), Same Yospe, Vice President & General Counsel (white male) Vernon Solomon, Chief Operating Officer (“COO”) (black male), and Dr. David T. Graham, Provost/Executive Dean (white male).

20. Despite her qualifications and responsibilities, [REDACTED] was the lowest-paid member of the President’s Council, earning an annual base salary of \$210,000 plus a potential annual bonus of \$35,000, although the Company did not distribute such bonus in 2024.

III. Manipal Begins to Perpetuate a Pattern of Sex and Race-Based Discrimination Against [REDACTED] and Interference With Her FMLA Rights

21. Despite having risen to the leadership ranks of Manipal, [REDACTED] experienced severe discrimination and harassment based on her sex and race.

22. As a 36-year-old Black woman and the only female on the President’s Council, [REDACTED] was subjected to differential treatment and undermining behavior, particularly from senior executives Dr. Bell, Mr. Sadiq and Mr. Yospe.

23. [REDACTED] experiences with sex-based discrimination began as early as December 2017, when she attended a company holiday party where Mr. Marudheri, who was known to have alcohol issues, became intoxicated and engaged in inappropriate physical conduct with [REDACTED]

24. During this interaction, Mr. Marudheri extended his hand in an apparent attempt to hold [REDACTED] hand, and then moved uncomfortably close to [REDACTED] and refused to release her hand when she attempted to back away. [REDACTED] was desperate to receive assistance, and only when another employee, Daniel Van Brummelen, Finance, intervened was she able to extricate herself from this incredibly inappropriate situation Mr. Marudheri had forced her into.

25. While [REDACTED] reported this incident to then-President Neal Simon, no remedial action was taken. This left [REDACTED] with the understanding that Mr. Marudheri’s conduct was condoned by not only Mr. Simon but the company as a whole.

26. In 2019, when [REDACTED] was pregnant, she faced additional discrimination and harassment.

27. In April 2019, when [REDACTED] tried to meet with Mr. Marudheri to let him know she was pregnant and would no longer be able to travel to Antigua or India during her third trimester, she discovered that he seemed to be under the influence of alcohol.

28. Mr. Marudheri began yelling at [REDACTED] regarding an ongoing investigation, which she was conducting as Head of HR, in which he was implicated.

29. Mr. Marudheri's attempt to interfere in this investigation by intimidating [REDACTED] not only created an untenable conflict of interest but also placed [REDACTED] in an extremely uncomfortable position.

30. Close to tears, [REDACTED] informed Mr. Marudheri that she was pregnant and tried to explain her upcoming travel restrictions.

31. Mr. Marudheri failed to respond to either the news of [REDACTED] pregnancy or her inability to travel, and instead was dismissive of her.

32. When [REDACTED] stated that she would need to take maternity leave from September 2019 to December 2019, Mr. Marudheri's response was, "We cannot afford to have you off completely for 3 months. You're the only HR person we have."

33. In fact, Mr. Marudheri suggested that [REDACTED] take a mere "one-to-two-week vacation" and then work from home.

34. When [REDACTED] stated that she had announced her pregnancy early in hopes that another employee would be trained to provide temporary HR assistance during [REDACTED] maternity leave, Mr. Marudheri asked [REDACTED] if she could work remotely instead of taking maternity leave. When she stated that doing so would be difficult for her, he denied her request for

maternity leave. A plan was created for her to work remotely with the assistance of Gurjeet Kaur, Finance Support, during her absence.

35. This hostile interaction with Mr. Marudheri left [REDACTED] visibly shaken and in tears. Mr. Marudheri's response deeply upset [REDACTED] who was concerned about both her job security and the potential complications of childbirth, especially as a first-time mother.

36. While she once again reported Mr. Marudheri's misconduct to then-President Neal, who promised to address the matter with Mr. Marudheri during a reconciliation meeting, no such meeting ever occurred and, once again, no remedial action was taken.

37. For the second time, [REDACTED] protected complaint was blatantly ignored by Manipal.

38. Despite [REDACTED] attempts to plan for coverage of all of her duties and responsibilities during her maternity leave, Mr. Marudheri provided only minimal support—assigning a junior finance staff member as a payroll assistant—while the full burden of HR responsibilities remained with [REDACTED] after she gave birth.

39. As a result, [REDACTED] was prevented from taking maternity leave and was left completely overwhelmed by her full workload while simultaneously caring for a newborn.

40. [REDACTED] even received work-related requests from Mr. Marudheri and Mr. Sadiq while she was in the hospital, where her son was in distress during delivery, despite the fact that the Company was well aware of these circumstances.

41. After giving birth on September 5, 2019, [REDACTED] was under the impression that she would be given at least two weeks of personal time off to welcome her child, however even these two weeks were interrupted by constant work-related requests from Mr. Marudheri and Mr. Sadiq, including demands for background checks and new hire onboarding assistance.

42. After these two weeks of what was supposed to be, but was not, time off, [REDACTED] was required to work from home beginning on September 23, 2019.

43. When [REDACTED] returned to in-person work in February 2020, Mr. Marudheri continued to exhibit discriminatory attitudes toward her parental responsibilities.

44. When [REDACTED] explained that she needed to attend medical appointments or address childcare matters, Mr. Marudheri would complain, stating, “we gave you off 5 months, no one gets time off like this”—a patently false statement given that [REDACTED] had worked remotely throughout this five month period and had been prevented from taking actually time off to bond with her newborn.

IV. [REDACTED] Continues to be Discriminated Against after Being Appointed to the President’s Council

45. The discriminatory treatment intensified after [REDACTED] was appointed to the President’s Council in June 2024.

46. As the only female member of this senior leadership group, [REDACTED] was routinely undermined and her contributions dismissed, particularly by Dr. Bell, Mr. Sadiq and Mr. Yospe.

47. In meetings, Dr. Bell would frequently cut [REDACTED] off when she attempted to speak about her department’s matters, giving preference to male colleagues.

48. When [REDACTED] would make suggestions, they would be ignored, only to be praised when later repeated by male colleagues.

49. There was a consistent pattern of overreach by Mr. Yospe into matters that fell squarely within the domain of HR, from which he would preclude [REDACTED]

50. This included Mr. Yospe’s frequent and well-documented private discussions with the President, Dr. Bell, regarding employee leave policies, benefits administration, and other core HR functions without the knowledge or involvement of [REDACTED]

51. These actions not only undermined [REDACTED] authority but also reflected a persistent disregard for established organizational roles and processes.

52. [REDACTED] felt ostracized and defeated and while she wanted to complain, again, about the mistreatment she was experiencing, she feared her complaints would again be ignored.

53. This pattern of mistreatment was so obvious that other male executives, including Mr. Hauser and Mr. Solomon, explicitly acknowledged to [REDACTED] that Dr. Bell was ignoring and ostracizing her because of her gender.

54. In September 2024, this mistreatment intensified when [REDACTED] experienced racially-biased treatment when a male consultant, referring to [REDACTED] and another Black employee named Karen, stated in an email, “You people don’t understand anything.”

55. When [REDACTED] reported this incident to Dr. Bell, her complaint was once again initially ignored, and no corrective action was taken.

56. Instead, Dr. Bell invited the consultant who made this racist remark to a President’s Council meeting, where the consultant offered the inadequate response: “I’m sorry that you got offended.”

57. This not only placed the burden on [REDACTED] but also failed to address the inappropriate and racially biased nature of the comment or take any measures to prevent them from recurring.

58. Dr. Bell did not make any attempts to remedy this situation and in a subsequent conversation, he directed [REDACTED] to “move on.”

59. Between October and December 2024, [REDACTED] engaged in protected activity by expressing her concerns to other Council members that Dr. Bell treated her differently as the only female in the Council and one of only two Black members of the Council.

60. However, in a shocking disregard for the confidential nature of her protected complaint, rather than addressing [REDACTED] concern, Mr. Sadiq reported [REDACTED] comments back to Dr. Bell.

61. Then instead of addressing [REDACTED] complaints, Dr. Bell required Mr. Hauser to verify whether [REDACTED] had complained about him.

62. Once again, [REDACTED] concerns were completely ignored.

63. Moreover, despite her senior position and extensive responsibilities, [REDACTED] was the lowest-paid member of the President's Council.

64. This pay disparity, coupled with the fact that she was the only female and one of only two Black members on the Council, strongly suggests that her compensation was influenced by discriminatory factors rather than legitimate business considerations.

65. [REDACTED] has been subject to years of base pay and bonus inequity when compared to other senior members of the organization.

66. This inequality was further highlighted in January 2025, when Mr. Sadiq was promoted to Senior VP of Strategy and Operations, bypassing the HR processes that [REDACTED] would normally oversee.

67. Dr. Bell extended a high-level executive position to Mr. Sadiq, an IT consultant, who was not an employee at the time.

68. This role, the second highest within the organization, placed Mr. Sadiq in a position of authority over long-standing employees, including oversight of critical departments such as Human Resources.

69. Notably, this appointment was made outside of established HR hiring and promotion protocols and despite Mr. Sadiq's evident lack of qualifications or relevant experience to effectively

lead the newly assigned departments.

70. Dr. Bell had previously offered a comparable executive opportunity only to Mr. Hauser, further highlighting a pattern of preferential advancement for male leaders.

71. Also in January 2025, [REDACTED] was selected to serve on grand jury duty for one month, which she informed her then supervisor, Dr. Bell, and the rest of the Presidential Council.

72. Dr. Bell's response made it clear that he questioned [REDACTED] ability to not fall behind on her work responsibilities while serving jury duty. This lack of confidence was completely unwarranted, especially since it had only been a few years since [REDACTED] was required to work full-time right after giving birth to her son.

73. To make matters worse, Dr. Bell publicly undermined [REDACTED] specifically amongst the President's Council and then indirectly demoted her by changing her supervisor from Dr. Bell to Mr. Sadiq.

74. Frustrated by this disparate treatment, in January 2025, [REDACTED] complained to Mr. Hauser that she was being prevented from performing essential HR functions, was being treated differently than her male colleagues, and that Dr. Bell was ignoring her concerns.

VI. [REDACTED] Engages in Protected Whistleblower Activity

75. As VP of Human Resources and based on her extensive career in HR, [REDACTED] was not only highly knowledgeable regarding the obligations of the Company but she had a professional and legal duty to ensure the Company's compliance with applicable federal and state laws, regulations, and rules governing employment practices and employee welfare.

76. The concerns [REDACTED] raised about the Company's practices constituted protected whistleblower activity under NYLL § 740, as she raised objections to, disclosed, and refused to participate in activities and practices that she reasonably believed violated laws and rules.

77. [REDACTED] first complained internally to her supervisors, Dr. Bell and other members of senior leadership, about unlawful employment practices and violations of law before the Company's adverse actions against her, thereby exhausting internal remedies within Respondent and affording the Company a reasonable opportunity to correct such violations.

78. Specifically, [REDACTED] engaged in protected whistleblower activity when she raised concerns about Mr. Sadiq's misclassification as a consultant rather than an employee during a President's Council meeting in January 2025.

79. In response, during this same meeting, Dr. Bell became visibly angry and accused [REDACTED] of undermining Mr. Sadiq's leadership. Instead of addressing the substance of these concerns, Dr. Bell questioned the timing of [REDACTED] raising them.

80. [REDACTED] reasonably believed that the misclassification of Mr. Sadiq violated federal and state tax laws, including Internal Revenue Code ("IRS") provisions regarding employee versus independent contractor classification, as well as New York State labor laws regarding proper worker classification. [REDACTED] concerns about Mr. Sadiq's misclassification were based on her extensive knowledge and experience in HR compliance matters and her understanding that Mr. Sadiq was performing duties consistent with that of a senior executive employee.

81. [REDACTED] further engaged in protected whistleblower activity when she raised HIPAA compliance concerns regarding Mr. Sadiq's participation in insurance-related meetings and discussions.

82. [REDACTED] specifically objected to Mr. Sadiq's presence in early-stage insurance discussions because he lacked HR experience, had not received required HIPAA training, and would have access to sensitive personal health information and protected health information ("PHI") of employees in violation of HIPAA's privacy and security rules.

83. When [REDACTED] raised concerns about HR processes being bypassed during Mr. Sadiq's promotion, Dr. Bell again reacted with hostility, repeatedly insisting "the matter is settled!" and continuing to undermine her authority.

84. While two male colleagues, Mr. Hauser and Mr. Solomon, spoke up in support of [REDACTED] during this meeting, Dr. Bell later apologized only to Mr. Hauser, ignoring both Mr. Solomon (who is Black) and [REDACTED] suggesting a pattern of both gender and racial discrimination.

85. [REDACTED] also engaged in protected whistleblower activity when she objected to and refused to participate in improper hiring practices that violated equal employment opportunity laws and the Company's obligations as an equal opportunity employer.

86. In February 2025, when Mr. Sadiq instructed [REDACTED] to immediately hire a candidate he had personally identified for a newly created Financial Aid position without following standard HR protocols, [REDACTED] objected on the grounds that this directive violated equal employment opportunity principles and fair hiring practices.

87. [REDACTED] reminded Mr. Sadiq that the Company's HR protocols exist specifically to support the Company's commitment to being an equal opportunity employer and to ensure compliance with federal, state, and local anti-discrimination laws.

88. [REDACTED] objections to these practices were made in good faith based on her reasonable belief that the Company's actions violated laws, rules, and regulations, and she was acting within the scope of her responsibilities as VP of Human Resources to ensure legal compliance.

89. [REDACTED] whistleblower activities were known to Dr. Bell, Mr. Sadiq, and other members of senior leadership, as she raised these concerns directly with them in meetings, email correspondence, and through HR channels.

V. ██████████ Experiences a Series of Discriminatory and Retaliatory Actions Following Her Protected Complaints and Whistleblower Activity Which Culminate In Her Termination and Interference With Her FMLA Rights

90. On February 10, 2025, ██████████ alerted Dr. Bell that her son was ill, and she needed to work remotely for the week and also indicated that she would not be physically present for the President's Council meeting on February 11, 2025.

91. On February 11, 2025, ██████████ sent an email to Mr. Sadiq to inform him that her son needed immediate medical attention, and she would miss the President's Council meeting.

92. Despite both Mr. Sadiq and Dr. Bell having been put on notice, Mr. Hauser was still directed to contact ██████████ to question her whereabouts during the meeting.

93. In this conversation with Mr. Hauser, ██████████ informed him of the fact that she had informed both Mr. Sadiq and Dr. Bell of her son's medical emergency.

94. Mr. Hauser informed ██████████ that he would make an announcement to the group regarding the reason for her absence.

95. On February 18, 2025, ██████████ provided the HR weekly update during the President's Council meeting, during which she noted that she had initiated preliminary discussions with the organization's insurance carrier and shared the initial projected increase for the upcoming plan year renewal.

96. As she began outlining the process, Mr. Sadiq abruptly interrupted and asserted that he should be included in all insurance-related meetings moving forward.

97. ██████████ responded that these were early-stage discussions, and consistent with past practice, broader involvement—including Mr. Sadiq—would occur during later stages.

98. Despite this explanation, Mr. Sadiq insisted on full participation and reiterated his

demand in a follow-up email.

99. In response, [REDACTED] consulted with Dr. Bell to express her concerns, including the standard procedural protocol limiting early-stage insurance discussions to HR.

100. She also raised valid HIPAA-related concerns regarding the inclusion of Mr. Sadiq—who lacks both HR experience and HIPAA training—given the sensitive nature of personal health and claims data shared in these early conversations.

101. Dr. Bell acknowledged these concerns and instructed [REDACTED] to email Mr. Sadiq, providing specific language to clarify the appropriate timing of his involvement.

102. As anticipated by [REDACTED] this led to a series of hostile and increasingly unpleasant emails from Mr. Sadiq.

103. Dr. Bell eventually intervened and informed [REDACTED] directly that he would speak with Mr. Sadiq.

104. Following this incident, Mr. Sadiq's undermining and retaliatory behavior escalated.

105. Notably, while Dr. Bell had a documented pattern of publicly challenging and undermining [REDACTED] his approach with male colleagues—such as Mr. Sadiq—differed significantly.

106. In similar situations, Dr. Bell addressed concerns privately rather than in public forums.

107. This disparate treatment further illustrates a pattern of gender-based discrimination against [REDACTED]

108. On February 21, 2025, [REDACTED] received an email from Mr. Sadiq notifying her of his intent to add a newly created position to the Financial Aid team.

109. He further stated that he had already identified a candidate for the role and proposed

both a title and salary range.

110. Mr. Sadiq instructed [REDACTED] to immediately send the candidate an employment application and to begin the onboarding process without delay.

111. [REDACTED] was taken aback by this directive, as she had not been involved in any prior discussions regarding the creation, approval, or budget allocation for this position—despite being the head of HR.

112. In response, [REDACTED] reminded Mr. Sadiq of the organization's established HR protocols, including the purpose of such procedures in supporting the company's commitment to being an equal opportunity employer.

113. Mr. Sadiq, however, insisted on bypassing these standard processes, citing his personal association with the candidate.

114. He continued to pressure [REDACTED] to expedite the hiring process, and when she reiterated the importance of adhering to fair and transparent hiring practices, Mr. Sadiq accused her of acting against the company's best interests.

115. This disagreement led to a series of hostile and increasingly antagonistic email exchanges initiated by Mr. Sadiq.

116. Rather than addressing the policy concerns raised by [REDACTED] Dr. Bell responded publicly to the email thread, copying the Chief HR Officer, Mr. Nishith Mohanty, who is at Manipal in India, and expressed his support for Mr. Sadiq's position.

117. This was done despite the legitimate compliance and equity issues flagged by [REDACTED] [REDACTED] including the fact that no internal or external candidates were given a fair opportunity to apply, thereby undermining equal employment practices.

118. This incident is yet another example of [REDACTED] being deliberately excluded from

key HR decisions, her professional judgment being dismissed, and her attempts to enforce lawful and ethical practices being met with hostility and retaliation.

119. These actions reflect a continued pattern of disparate treatment and contributed to an increasingly hostile work environment, particularly in response to [REDACTED] engagement in protected activity including her protected whistleblower disclosures and objections under NYLL 740.

120. On February 21, 2025, [REDACTED] drafted a formal complaint documenting the Company's violations of laws, but she did not send it because she feared the retaliation against her would escalate if she filed a formal complaint.

121. Notably, however, this complaint appears to have been accessed by someone else on the Company's system, as indicated by the system logs showing unauthorized access to her draft at 12:14 PM on February 21, 2025.

122. This underlines the extra scrutiny [REDACTED] was facing immediately after she made her protected complaints and her whistleblower activity.

123. On February 24, 2025, [REDACTED] informed Mr. Hauser that she needed to take her son to a medical specialist because he had become severely ill with high fevers and unexplainable seizures. She explained that the doctors were closely monitoring her son's condition, which had worsened dramatically, and indicated that she would need to take a protected leave of absence under the FMLA to provide care for her son.

124. Just two days later, on February 26, 2025, [REDACTED] was abruptly terminated in a cold and callous act, which not only interfered with her rights under the FMLA, but also retaliated against [REDACTED] for engaging in protected complaints and whistleblower activity.

125. The Company's stated reason for her termination was that they were "restructuring" and had made a decision to no longer have in-house HR; however, this is clearly pretextual given

that no other positions were eliminated, and the Company did not immediately bring in an outsourced HR company.

126. At the time of her termination, the Company was well aware that [REDACTED] and her family were undergoing crucial medical testing to determine whether her son had epilepsy.

127. The timing of her termination not only proves that it was unlawful but also was particularly callous given that [REDACTED] was in the midst of a family medical crisis involving her young child who was facing a serious neurological condition requiring urgent medical care.

128. As further evidence of disparate treatment, while other executives, all male, at her level typically received at least six months of severance pay, six months of COBRA coverage, and payment for all accrued and unaccrued vacation days for the calendar year, [REDACTED] was offered only three months of severance pay, healthcare coverage until the end of the month: February 28, 2025 (two days after her abrupt termination), no company-sponsored COBRA coverage, and payment only for accrued vacation days from January 1, 2025 – February 26, 2025.

129. Furthermore, another female executive (who was white) who resigned received the full executive separation package.

130. Moreover, the Company required [REDACTED] to return her company equipment within 24 hours of termination, a departure from normal procedure.

131. The disparate treatment towards [REDACTED] after her termination was a continuation of the pattern of discrimination on the basis of her gender and race that [REDACTED] faced during her employment.

132. Based on the foregoing discussion, it is clear that Respondent has discriminated and retaliated against Charging Party on the basis of her gender and race in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq. (“Title VII”); the Family and Medical Leave

Act, 29 U.S.C. §§ 2601 et seq. (“FMLA”); New York Labor Law § 740 (“NYLL § 740”); 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.