

<p>CHARGE OF DISCRIMINATION</p> <p><small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small></p>	<p>Charge Presented to: Agency(ies) Charge No(s):</p> <p><input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC</p>
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_____ and EEOC

State or local Agency, if any

<small>Name (indicate Mr. Ms. Mrs.)</small> ██████████	<small>Home Phone (Incl. Area Code)</small> ██████████	<small>Date of Birth</small> ██████████
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<small>Street Address</small> ██████████	<small>City, State and ZIP Code</small> ██████████
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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.)

<small>Name</small> Prepaid Expense Solutions, Inc.	<small>No. Employees, Members</small> About 100	<small>Phone No. (Include Area Code)</small> (877) 274-3390
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<small>Street Address</small> 169 Madison Avenue, Suite 15440	<small>City, State and ZIP Code</small> New York, NY 10016
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<small>Name</small>	<small>No. Employees, Members</small>	<small>Phone No. (Include Area Code)</small>
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<small>Street Address</small>	<small>City, State and ZIP Code</small>
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<p><small>DISCRIMINATION BASED ON (Check appropriate box(es).)</small></p> <p><input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN</p> <p><input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input checked="" type="checkbox"/> OTHER (Specify below.) GENDER</p>	<p><small>DATE(S) DISCRIMINATION TOOK PLACE</small></p> <table style="width:100%;"> <tr> <td style="text-align: center;"><small>Earliest (ADEA/EPA)</small></td> <td style="text-align: center;"><small>Latest (All)</small></td> </tr> <tr> <td></td> <td style="text-align: center;">08/25/2025</td> </tr> </table> <p><input type="checkbox"/> CONTINUING ACTION</p>	<small>Earliest (ADEA/EPA)</small>	<small>Latest (All)</small>		08/25/2025
<small>Earliest (ADEA/EPA)</small>	<small>Latest (All)</small>				
	08/25/2025				

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

Please see the attached Narrative Statement of Facts.

<p><input type="checkbox"/> I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p><small>NOTARY – When necessary for State and Local Agency Requirements</small></p>
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<p>I declare under penalty of perjury that the above is true and correct.</p> <p style="text-align: center; padding-top: 20px;"> <small>Date</small> April 3, 2026 <small>Charging Party Signature</small> </p>	<p>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.</p> <p>SIGNATURE OF COMPLAINANT</p> <p style="text-align: center; padding-top: 20px;"> <small>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</small> </p>
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**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NEW YORK DISTRICT OFFICE**

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[REDACTED]

Claimant,

-against-

PREPAID EXPENSE SOLUTIONS, INC.,

Respondent.

-----X

Claimant [REDACTED] (“Charging Party” or “[REDACTED]” hereby alleges the following against Respondent Prepaid Expense Solutions, Inc. (“PEX,” the “Company,” or “Respondent”) in support of her claims of discrimination, harassment, and retaliation based on her race, gender, national origin, pregnancy, and parental status.

NARRATIVE STATEMENT OF MATERIAL FACTS

Preliminaries

1. At all times relevant hereto, Charging Party [REDACTED] (“Charging Party” or “Ms. [REDACTED]” has been a resident of the State of [REDACTED] and the [REDACTED].
2. At all times relevant hereto, Respondent Prepaid Expense Solutions, Inc. (“PEX,” the “Company,” or “Respondent”) was and is a national for-profit organization maintaining its principal place of business at 169 Madison Avenue, Suite 15440, New York, NY 10016.
3. Upon information and belief, Respondent employs approximately 100 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. [REDACTED] Professional Background and Experience.

5. Prior to joining PEX, Ms. [REDACTED] built over six years of experience in the fields of risk assessment, fraud detection, and financial reconciliation.

6. Ms. [REDACTED] earned an Honors Bachelor of Arts degree in Criminology with minors in Sociology and Political Science from the University of Toronto in 2018. Her comprehensive background included serving as Visa Operations Administrator at HomeTrust Company from 2018-2021, where she oversaw secured Visa credit card application processing and investigated suspicious activity, and working as Store Manager at SWIMCO from 2016 to 2019, where she directed daily store operations and led sales teams.

7. When PEX hired Ms. [REDACTED] as Financial Operations Coordinator on March 14, 2022, at an annual salary of \$62,000, she brought valuable expertise and immediately began working to make significant contributions to the Company's operations. PEX assigned her responsibilities that included conducting financial risk assessments, analyzing financial data to forecast potential losses, performing daily reconciliations of bank settlements, ACH, wire transfers, payments, and reimbursements, and investigating suspicious transaction activities and payment patterns.

8. By the time PEX terminated her employment, the Company had increased her salary to \$66,300 through raises received for 2023-2024 and 2024-2025.

II. Respondent Retaliated Against Ms. [REDACTED] for her Protected Activity and Discriminated Against Ms. [REDACTED] on the Basis of Her National Origin and Race.

9. From the moment VP of Operations Shay Fitzpatrick learned that Ms. [REDACTED] was pregnant in March 2022, he exhibited discriminatory bias towards her that escalated into a sustained campaign of harassment, intimidation, and professional undermining for over three years. This pattern of discrimination was not an isolated incident; rather, it was and is a systemic problem at

PEX.

10. When PEX initially hired Ms. [REDACTED] she was the only Black female in a Financial Operations Coordinator position. When another Black female coworker, Hannah Dothard, joined PEX, she was also subjected to unfair treatment by Mr. Fitzpatrick.

11. In her first mid-year review in May-June 2022, approximately two months into employment, Ms. [REDACTED] formally submitted concerns she had about insufficient training and outlined proposals to remedy these concerns to Mr. Fitzpatrick.

12. In response, HR Manager Amy Gaspari apologized to Ms. [REDACTED] for the poor onboarding experience and spoke with Mr. Fitzpatrick about an appropriate training plan.

13. Following this intervention, the Company corrected this deficiency by implementing onboarding and training policies for new employees, which Ms. [REDACTED] never benefited from.

14. Mr. Fitzpatrick then began retaliating against Ms. [REDACTED] for the concerns she raised. He began chastising her to “speak proper English,” “use standard English,” and started claiming he had “communication issues” with her. When Ms. [REDACTED] shared this experience with Ms. Dothard, Ms. Dothard corroborated her own similar experiences via text message.

15. Mr. Fitzpatrick’s lack of respect for both Ms. [REDACTED] and Ms. Dothard, the only Black female employees, was undeniable. This lack of respect was demonstrated by certain behaviors, including but not limited to, mixing up Ms. [REDACTED] and Ms. Dothard’s names on multiple occasions.

16. Prior to Ms. [REDACTED] protected complaint, Mr. Fitzpatrick had never raised issue with Ms. [REDACTED] communication skills; after she complained, he began claiming that he could not understand what she was trying to say and that Ms. [REDACTED] might “put clients off” because they could not understand her despite Ms. [REDACTED] having little to no accent and no one else ever raising concerns about understanding her. Mr. Fitzpatrick also criticized Ms. [REDACTED] writing style,

comparing it unfavorably to university essay writing.

17. Mr. Fitzpatrick also created a hostile work environment for Ms. [REDACTED] by consistently embarrassing her in front of other employees—a calculated pattern of public humiliation designed to undermine her professional standing and credibility. The discriminatory conduct was so egregious, other employees regularly apologized to Ms. [REDACTED] for Mr. Fitzpatrick’s behavior. For example, Ms. Dothard told Ms. [REDACTED] that Mr. Fitzpatrick was “really picking on” her and “trying to push her out.” Some teammates even confided in Ms. [REDACTED] that they felt Mr. Fitzpatrick’s conduct might be racially motivated.

18. During this time, Ms. [REDACTED] excelled in her work performance, garnering compliments from the Chief Operating Officer, Stanley Yung, regarding her contributions to delinquency and collection tasks. However, Mr. Fitzpatrick undermined these compliments, first claiming they were not solely for Ms. [REDACTED] but for the whole team, then adding that Mr. Yung only complimented Ms. [REDACTED] because they are both Canadian. By attributing the COO’s compliment to a shared national origin rather than to Ms. [REDACTED] professional contributions, Mr. Fitzpatrick diminished her individual efforts and dismissed the merit of her work.

III. Ms. [REDACTED] Experiences Escalating Discrimination and Retaliation After Returning from Maternity Leave.

19. This severe and pervasive pattern of public embarrassment continued for approximately six months, until Ms. [REDACTED] took maternity leave on September 16, 2022. Ms. [REDACTED] pregnancy with twins was already considered high-risk, and her medical condition was exacerbated by the severe stress Mr. Fitzpatrick’s mistreatment caused, requiring Ms. [REDACTED] to discuss her work environment extensively with her therapist who expressed concern regarding the ways in which the work-related stress could impact her unborn child.

20. Ms. [REDACTED] returned from maternity leave on January 31, 2023.

21. During her return-to-work meeting with HR in January 2023, Ms. Gaspari subjected Ms. [REDACTED] to unlawful questioning about her ability to work as a mother of twins. Specifically, Ms. Gaspari told Ms. [REDACTED] that Mr. Fitzpatrick questioned whether she was “ready to come back to work” because she had “not just one baby, but two babies.” Ms. [REDACTED] was not only grilled about her ability to return, but also her intention in returning, including whether she would “be doing the work or focus[ing] on kids at home.”

22. Ms. [REDACTED] then engaged in further protected activity by complaining to Ms. Gaspari that Mr. Fitzpatrick’s inappropriate line of questioning made her feel as though he was trying to push her out of the Company simply because she was a mother of newborn twins. Ms. Gaspari summarily dismissed these legitimate concerns, claiming that Mr. Fitzpatrick was only concerned with determining how the team would operate moving forward. While Ms. [REDACTED] considered escalating her concerns regarding Mr. Fitzpatrick, based on Ms. Gaspari’s response, she did not escalate her complaints beyond the Company’s internal HR process out of fear of additional retaliation.

23. Following Ms. [REDACTED] return from maternity leave, Mr. Fitzpatrick continued to berate her in front of colleagues, and frequently nitpicked at and micromanaged Ms. [REDACTED] work, making her daily work life unbearable. For example, during the 2024 annual Business Continuity Planning (BCP) test, Mr. Fitzpatrick singled out Ms. [REDACTED] claiming that she had somehow caused the team to fail a team-wide exercise. Mr. Fitzpatrick continued to reference this incident in subsequent years as an example of inadequacy, further humiliating Ms. [REDACTED] and creating lasting damage to her professional reputation within the Company.

24. Ms. [REDACTED] once again reported Mr. Fitzpatrick’s unlawful conduct to HR in early 2024; however HR failed to initiate an investigation or otherwise adequately respond directly. Instead, Ms. Gaspari simply held a meeting with Ms. [REDACTED] and Mr. Fitzpatrick to discuss

communication and how PEX should provide constructive feedback. While the hostile work environment temporarily improved for about two weeks after HR's intervention, Mr. Fitzpatrick reverted to his discriminatory behavior soon after.

25. Witnessing this continued harassment, in August 2024, Ms. Dothard sent Ms. [REDACTED] text messages stating that Mr. Fitzpatrick is "nitpicking for no reason" and asking "[I]s there anything I [*sic*] can do or step in and say?" Ms. Dothard also warned Ms. [REDACTED] on July 31, 2024 that "HR is not your friend from what I've learned. They will always work for your boss over you."

IV. Mr. Fitzpatrick Continues to Harass Ms. [REDACTED] Even After Ms. [REDACTED] is Assigned a New Manager.

26. Though PEX assigned Ms. [REDACTED] a new manager, Traci Osborn, in March 2025, Mr. Fitzpatrick continued to contact Ms. [REDACTED] and treat her in a condescending manner when she asked for clarification from him. This dynamic persisted even when Mr. Fitzpatrick was unable to answer Ms. [REDACTED] questions.

27. For example, in early 2025, Mr. Fitzpatrick instructed Ms. [REDACTED] to share specific information with a client, which she did. Afterwards, in an abrupt reversal, he claimed he had been "flippant," and berated Ms. [REDACTED] for taking his words literally. After requiring she correct the communication with the client, he then reported the incident to Ms. [REDACTED] new manager Ms. Osborn as Ms. [REDACTED] error. Ratifying Mr. Fitzpatrick's harassment, Ms. Osborn also directed Ms. [REDACTED] to contact the client and correct the misinformation.

28. In August 2025, when another employee needed Mr. Fitzpatrick's assistance with a case review, Ms. [REDACTED] contacted Mr. Fitzpatrick on that employee's behalf. Mr. Fitzpatrick became hostile with Ms. [REDACTED] stating that he had "helped this person yesterday for 40 minutes" and wasn't going to "waste any more of [his] time to deal with any one of her crises today." He

directed Ms. [REDACTED] to relay “exactly what [he] said” to the employee.

29. Ms. [REDACTED] understood that Mr. Fitzpatrick was attempting to use her as a messenger to demean a colleague; rather than relay Mr. Fitzpatrick’s response verbatim, she courteously informed the employee that Mr. Fitzpatrick was busy and would review the case later.

30. Mr. Fitzpatrick immediately retaliated against Ms. [REDACTED] in response. The following week, during a department stand-up meeting, Mr. Fitzpatrick falsely announced to the entire department that Ms. [REDACTED] had “raised a P1 issue” (a high priority technical issue requiring immediate attention), when in fact Ms. [REDACTED] merely sent him a routine message asking if he had time to answer a simple yes or no question. Mr. Fitzpatrick publicly stated he would “let manager Traci deal with that employee for raising such issue and trying to waste [his] time,” deliberately mischaracterizing Ms. [REDACTED] professional inquiry as an unwarranted crisis wasting Company resources.

V. Ms. [REDACTED] is Immediately Terminated After Complaining About Mr. Fitzpatrick’s Misconduct Again.

31. Recognizing that the situation had become untenable, Ms. [REDACTED] made a verbal complaint about Mr. Fitzpatrick’s ongoing pattern of discriminatory and harassing behavior on August 18, 2025. During this Google meeting, Ms. [REDACTED] explained the incidents and noted that Mr. Fitzpatrick’s conduct created a hostile and toxic environment. Because of this, Ms. [REDACTED] requested that future communications with Mr. Fitzpatrick go through Ms. Osborn.

32. While Ms. Osborn initially agreed to review the situation with Mr. Fitzpatrick, Ms. Osborn failed to take any meaningful action to protect Ms. [REDACTED] from continued harassment or to prevent the obvious retaliation that would follow just one week later.

33. On August 25, 2025, in a meeting with Ms. [REDACTED] Ms. Osborn, and Ms. Gaspari, PEX abruptly terminated Ms. [REDACTED] employment, citing “reconstruction” as the reason for

termination. This is clearly pretextual, however, as the Company had just held its all-hands meeting earlier that day, and there was no mention of layoffs or budget issues. The timing of Ms. [REDACTED] termination—one week after her protected complaint—makes clear that PEX made this decision in retaliation for her protected complaints about discrimination and harassment.

34. Two days later, on August 27, 2025, Ms. [REDACTED] met with Ms. Gaspari and shared that she felt her termination was an act of retaliation because she had made a complaint the prior week. In this meeting, Ms. Gaspari did not dispute that Ms. [REDACTED] had engaged in protected activity just a week earlier, instead focusing on the fact that the termination was “truly not performance driven” and that Ms. Gaspari was “always willing to speak to [Ms. [REDACTED] professionalism and drive” and encouraging Ms. [REDACTED] to apply for management roles.

35. An investigation by the EEOC will reveal extensive documentation supporting Ms. [REDACTED] claims, including records of her multiple complaints to HR, her mid-year review in 2022, her January 2023 return-to-work meeting with Amy Gaspari, and her early 2023 HR complaint. Electronic communications, meeting records, and entries from PEX’s internal HR case management system will establish the timeline of Ms. [REDACTED] escalating complaints, as well as the Company’s deliberate failure to investigate and other inadequate responses. Furthermore, performance reviews, salary records, and comparative data regarding other employees will demonstrate the disparate treatment Ms. [REDACTED] experienced.

36. Additionally, communications from colleagues who witnessed Mr. Fitzpatrick’s discriminatory behavior towards Ms. [REDACTED] Mr. Fitzpatrick’s discriminatory management of foreign-born employees and employees of color driving some out of his department and even out of the Company; and the barriers to promotion and professional development these same protected employees experienced will corroborate the hostile work environment Ms. [REDACTED] endured. Finally, testimony from former employees will establish the long-standing pattern of Mr.

Fitzpatrick's discriminatory management practices and the Company's history of deliberate indifference to them.

37. PEX's conduct, through its agents, including Mr. Fitzpatrick, Ms. Gaspari, and Ms. Osborn, was outrageous, discriminatory, and designed to leave Ms. [REDACTED] vulnerable to termination despite her years of service and contributions to the Company's operations. The systemic and pervasive nature of the hostile work environment at PEX, combined with the Company's repeated failures to effectively address the discrimination after multiple HR complaints, demonstrate a systematic practice of racial and national origin discrimination.

38. The compounding effect of discrimination based on Ms. [REDACTED] race, national origin, and parental status has been overwhelming and devastating to her mental health and sense of self-worth. Ms. [REDACTED] has lost all sense of self-confidence, and constantly feels humiliated, embarrassed, unmotivated, and unhappy because of PEX's unlawful actions against her. PEX and numerous responsible individuals have destroyed Ms. [REDACTED] hopes to have a long, fulfilling career at PEX.

39. Based on the foregoing discussion, it is clear that Respondent has discriminated and retaliated against Charging Party on the basis of pregnancy, parental status, national origin, and race, as well as harassment and retaliation in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* ("Title VII"); the Pregnancy Discrimination Act; the New York State Human Rights Law, N.Y. Exec. 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.