

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

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ALEXANDRA ZERVOS,

Plaintiff,

Case No.: 1:25-cv-04550 (VSB)(VF)

- against -

AMENDED COMPLAINT

VOLUNTEERS OF AMERICA GREATER NEW YORK,
MICHAEL SOLANA, and HOLLY LEAHY

JURY TRIAL DEMANDED

Defendants.

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Plaintiff Alexandra Zervos, through her attorneys, Filippatos PLLC, hereby alleges against Defendants Volunteers of America Greater New York (“VOA” or the “Center”), Holly Leahy and Michael Solana (together the “Individual Defendants”) (altogether, “Defendants”) as follows:

NATURE OF THE CASE

1. The employment of Plaintiff Alexandra Zervos, a former Controller at VOA, – a not-for-profit organization that provides a wide range of social services to help individuals and families in need– was sadly cut short when she raised concerns about Defendant Holly Leahy’s, VOA Vice President of Finance, discriminatory behavior towards her and her colleagues. The temporal proximity of Ms. Zervos’s abrupt October 31, 2023, termination, and the complaints she made just days earlier, plainly demonstrate the Center’s unlawful animus towards Ms. Zervos.

2. As a result, Ms. Zervos brings this action against VOA, Ms. Leahy, and Michael Solana, VOA’s Chief Financial Officer (“CFO”), to obtain justice against the Center’s discriminatory and retaliatory attacks against her in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* (“Title VII”); the Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101 *et seq.* (“ADA”); Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. §

1981 (“Section 1981”); 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”).

PARTIES, JURISDICTION, VENUE AND ADMINISTRATIVE PREREQUISITES

3. At all times relevant hereto, Plaintiff Alexandra Zervos was a resident of the State of New York who is of Greek heritage.

4. At all times relevant hereto, Plaintiff was an employee of VOA working from July 10, 2023, until October 31, 2023.

5. At all times relevant hereto, VOA has been a not-for-profit organization incorporated under the laws of the State of New York, maintaining a principal place of business at 135 West 50th Street, 9th Floor, New York, NY 10020.

6. Upon information and belief, VOA employs over 50 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

7. Upon information and belief, at all times relevant hereto, Defendant Holly Leahy has been an individual residing in the State of New Jersey, holding the position of “Vice President of Finance” at VOA, and had the authority to hire, terminate, and affect the terms and conditions of Plaintiff’s employment and/or to otherwise influence the decision making regarding same.

8. Upon information and belief, at all times relevant hereto, Defendant Michael Solana has been an individual residing in the State of New York, holding the position of “Chief Financial Officer” at VOA, and had the authority to hire, terminate, and affect the terms and conditions of Plaintiff’s employment and/or to otherwise influence the decision making regarding same.

9. This Court has subject matter jurisdiction over this matter pursuant to 28 USC §1331 as Plaintiff has brought claims under Title VII, Section 1981, and the ADA.

10. This Court has supplemental jurisdiction over the claims that Plaintiff has brought under state, and local law pursuant to 28 USC § 1367.

11. Venue is proper in this district, pursuant to 28 USC §1391(b)(2), as a substantial part of the acts complained of occurred therein.

12. By: (a) timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”); (b) receiving a Notice of Right to Sue from the EEOC on March 6, 2025; and (c) commencing this action within 90 days of the issuance of the Notice of Right to Sue, Plaintiff has satisfied all procedural prerequisites for the commencement of the instant action.

MATERIAL FACTS

I. Ms. Zervos Joins VOA and Quickly Excels

13. Prior to joining VOA, Ms. Zervos graduated from Hofstra University and obtained a Master of Business Administration degree in Accounting from St. Joseph’s University. Plaintiff received her certified public accountant (“CPA”) license on July 30, 2020, and became a member of American Institute of Certified Public Accountants (“AICPA”).

14. Ms. Zervos excelled in all her professional roles, including as an audit associate at Nussbaum Yates & Wolpow PC, an audit senior at Grant Thompson LLP, an internal revenue agent at the Internal Revenue Service, and a senior accountant at Cold Spring Harbor Laboratory.

15. Ms. Zervos joined VOA as a controller overseeing its Treasury, Accounts Payable, and Financial Reporting departments on July 10, 2023. She was hired by Julia A. Oliver, Chief Operating Officer (“COO”) and Mr. Solana at an annual salary of \$145,000.

16. At VOA, Ms. Zervos was a consummate team player, dedicated to serving the Center's mission by helping vulnerable people experiencing homelessness, victims of domestic violence, and underprivileged people in New York. Ms. Zervos was well-liked among colleagues, and Mr. Solana and Ms. Oliver would often praise her for her exemplary performance and enthusiastic demeanor.

17. During her initial three-month probation period, Ms. Zervos left a highly favorable impression on both Mr. Solana and Ms. Oliver. Ms. Zervos met regularly with Mr. Solana (every Friday) to discuss ongoing work. At these meetings, Mr. Solana expressed his appreciation for Ms. Zervos contributions and informed her that he was highly satisfied with her performance. He also commended her effect on others and how the morale of the team had noticeably increased since she started working at VOA. Additionally, Mr. Solana stated that he was impressed by Ms. Zervos's team-building initiatives.

18. Similarly, in mid-October 2023, Ms. Oliver showered Ms. Zervos with praise during a two-hour conversation they had in Ms. Oliver's office. Ms. Oliver described Ms. Zervos as a "great fit and asset" to VOA, who worked well with the team. Ms. Oliver called Ms. Zervos her "go-to" and "the future of VOA."

19. Ms. Oliver also shared her vision for improving the Finance Department and her personal opinions of the interim CEO and VOA's board with Ms. Zervos. Ms. Oliver welcomed and valued Ms. Zervos's opinions on projects and improvements to VOA.

20. Similarly, Ms. Zervos's colleagues openly professed their admiration and appreciation of her work and attitude countless times. Veronica Ortega, Special Assistant to the COO, lauded the positive effect Ms. Zervos's addition had on the Finance Department and how Ms. Oliver and Mr. Solana were pleased with her.

21. Keisha Hackney, Assistant to the CFO, described Ms. Zervos's arrival as "positive" and "great" to the finance team and said that her sister, who used to work at VOA, wished she had gotten a chance to work with Ms. Zervos.

22. Internal Audit Director Caroline Malvasio complimented Ms. Zervos's work, GAAP understanding and adherence, and the positive change she brought to VOA, describing Ms. Zervos as one of the few workers who took compliance seriously and worked well with staff.

23. Other staff members such as Brian Halber, Assistant Vice President of Finance, Erica Harvey, Recruitment Solutions, Sandra Marquez, Assistant Vice President of Asset Management, Bill Grigonis, Vice President of Information Technology, Gil Aviles, Director of Government Contracts, and Jose Rivera, Supervisor of Financial Analysis and Reporting, also complimented Ms. Zervos's work and innovative ideas.

II. Ms. Leahy Harasses and Demeans Ms. Zervos and Her Teammates

24. As noted above, Ms. Zervos's first few months at VOA went very smoothly, and all indications pointed towards her long-term success at the Center.

25. However, things began to drastically change for the worse beginning around September 5, 2023, when Defendant Leahy, Assistant Vice President of Finance, joined VOA's New York office.

26. Ms. Leahy instantly began to make biased and discriminatory statements directed to and/or about employees that were immigrants or persons of color. Ms. Leahy's bullying and abusive behavior, coupled with her discriminatory conduct, created a toxic work environment for Ms. Zervos, the team she managed, and other coworkers at VOA.

27. Ms. Leahy especially directed her vitriol and racist comments towards Ms. Zervos, an immigrant from Greece, and her Black and Asian colleagues. Aware that Ms. Zervos had

therapy sessions every Friday, Ms. Leahy made fun of Ms. Zervos's mental health and disability, mockingly stating "you have therapy again!?" and "you better go to therapy!" while derisively chuckling loudly.

28. Additionally, despite her attempts at becoming a mother, Ms. Zervos was unable to conceive a child for 15 years. Ms. Leahy was aware of this and used Ms. Zervos's failed attempts at becoming a mother to demean Ms. Zervos, including by telling her: "I *actually* have daughters."

29. Ms. Leahy also directed biased comments at Ms. Zervos based on Ms. Zervos's Greek ethnicity, publicly mocking her Greek accent at meetings, including how she pronounced words and terms like "Schwartz Shelter" and "Westchester." As a result, Ms. Zervos began to overthink how she pronounced words and experienced panic attacks at work, which further fueled Ms. Leahy's discriminatory remarks concerning Ms. Zervos's mental health.

30. Ms. Leahy's discriminatory bias against Black and Asian employees was deeply upsetting. There was a noticeable difference with how Ms. Leahy spoke to and treated Caucasian employees in comparison to how she spoke to employees of color. While it is impossible to recount every example, below are some examples of Ms. Leahy's discriminatory and biased conduct:

- i. Every Tuesday, during audit project meetings, Ms. Leahy openly disparaged and targeted Black and Asian employees, calling Black employees "lazy" and mockingly imitating the accents of Asian employees.
- ii. Ms. Leahy refused to invite Annette Hale, a Black controller, to any meetings (including those pertaining to her department) and called her "incapable" and an "idiot."
- iii. Ms. Leahy called a long-time Asian senior accountant named Ling Na Weng "garbage." When Ms. Zervos tried to defend Ms. Weng, Ms. Leahy made fun of Ms. Weng's accent and asked whether Ms. Zervos "really understands anything Ling says."
- iv. Ms. Leahy stated that she did not like speaking directly to anyone in the Accounts Payable Department which predominantly consisted of Black and Asian employees. Instead, she directed Ms. Zervos to speak on her behalf, telling Ms.

Zervos to “deal with” the workers in that department whom she called “incapable and useless.” If it was ever necessary for Ms. Leahy to speak to someone from the Accounts Payable Department, she would address them in a condescending and derisive tone.

- v. Ms. Leahy aggressively micromanaged Black employees but not Caucasian employees. For instance, Ms. Leahy constantly checked on the work performed by Sheaddean Mullings, a Black accounting assistant, contacting her incessantly, and even called her “lazy.” Similarly, on Demoy Smith’s, a Black temporary accountant, first day of work in October 2023, Ms. Leahy obsessively asked Ms. Zervos and Amir Yousef, Assistant Controller, what Mr. Smith was tasked with doing, even though he had yet to be assigned any substantive work. There was no legitimate reason for Ms. Leahy to monitor him so closely or critique his presence.

31. Ms. Leahy’s demeaning behavior traumatized multiple members of VOA, causing some to quit and others to take sick days. Ms. Zervos advocated for her teammates whenever she witnessed them being targeted by Ms. Leahy. For instance, on October 20, 2023, Ms. Zervos had a Microsoft Teams call with her team to thank them for their hard work and cheer them up after observing low team morale. She even permitted her team to clock out of work and told them not to work late or over the weekend to liven up their spirits.

32. That weekend, Ms. Zervos felt depressed and hardly slept, crying profusely due to Ms. Leahy’s egregious conduct and how it was detrimentally impacting her teammates and subjecting them to a hostile work environment.

33. On October 23, 2023, Ms. Zervos met with Mr. Solana and Ms. Leahy to discuss expanding the auditing team. At the meeting, Ms. Leahy again targeted Ms. Weng, stating that “Ling should not be reviewing anyone’s work,” even though Ms. Weng had reviewed the work of others at VOA for the prior 15 years and was well-respected among her peers.

34. Ms. Leahy proceeded to call Ms. Weng “garbage” and “useless” — terms that she only directed at employees of color. Ms. Leahy then made baseless complaints about the work of three persons of color.

35. Flabbergasted at Ms. Leahy's blatant misconduct, Ms. Zervos reminded Ms. Leahy that, "We are all human beings, and we deserve to be treated as such." Ms. Zervos objected to Ms. Leahy treating employees like "slaves" and asked that Ms. Leahy go to her about any issues she had concerning her team rather than insult her team members directly.

36. At this point, Mr. Solana muted Ms. Zervos and messaged her in the Microsoft Teams Chat to "reel it in."

37. The following week, Ms. Zervos was not able to go into the office due to distress, anxiety, insomnia, pounding headaches, nausea, and severe depression she was experiencing due to Ms. Leahy's behavior and the Center's failure to do anything to deter or prevent it.

38. On October 26, 2023, Ms. Zervos visited a doctor to treat a high fever and sinus infection. Ms. Zervos's health was deteriorating due to Ms. Leahy's dreadful and discriminatory behavior towards her and her colleagues.

III. Ms. Zervos Reports Ms. Leahy's Racist and Hostile Behavior to Mr. Solana

39. Ms. Zervos made protected complaints to Mr. Solana concerning Ms. Leahy's discriminatory behavior on four separate occasions. In early October 2023, Ms. Zervos notified Mr. Solana that Danielle Sa, a Senior Accountant, asked to not be directly contacted by Ms. Leahy due to her discriminatory remarks and behavior. Ms. Zervos also notified Mr. Solana that her dark-skinned Egyptian colleague Marina Nassif, a Treasury Accounting Specialist, also resigned due to being bullied harshly by Ms. Leahy.

40. In mid-October 2023, Ms. Zervos pleaded with Mr. Solana to discipline Ms. Leahy after she made discriminatory remarks about Ms. Weng and Black employees. She specifically noted that Ms. Leahy had called Ms. Weng "garbage" and "not worthy," and had discriminatorily mocked Ms. Weng's accent.

41. However, shockingly, when Ms. Zervos conveyed this information to Mr. Solana, he seemed almost cheerful and appeared to celebrate Ms. Leahy's actions by saying that she was "tough" and was "just doing her job."

42. Ms. Zervos also told Mr. Solana that Jenny Marquin, a Black employee in the Accounts Payable Department, had transformed from a vivacious and lively employee to being withdrawn, quiet and anxious all the time.

43. Rather than admonish Ms. Leahy's incorrigible behavior in some way, Mr. Solana suggested that Ms. Zervos oversee the Accounts Payable Department rather than Ms. Leahy. Since none of Ms. Zervos's complaints were taken seriously, VOA permitted Ms. Leahy to continue her discriminatory conduct unabated.

44. In or around October 23, 2023, Plaintiff also told Mr. Solana that her whole team's morale was low due to Ms. Leahy's racist and bullying remarks.

45. Ms. Zervos further complained about how Ms. Leahy's constant harassment made it harder for her team members to perform their jobs.

IV. Plaintiff is Ruthlessly and Unlawfully Terminated in Retaliation For Complaining

46. On October 30, 2023, prior to a scheduled meeting with auditors, Ms. Zervos met with Ms. Leahy and another controller in connection with an ongoing project. At this meeting, Ms. Leahy claimed that Ms. Zervos's work — which she had already reviewed and approved — was now missing information.

47. When Ms. Zervos asked her to explain what was missing from her work, Ms. Leahy became enraged and yelled: "I am not going to bother talking to you ... get off the call." Ms. Zervos was shocked by Ms. Leahy's rude and unhinged behavior.

48. Immediately after being viciously kicked off the call, Ms. Zervos contacted Mr. Solana and Ms. Oliver to request a meeting to discuss Ms. Healy's behavior and whether she—Ms. Zervos—was still employed by VOA but did not hear back from either.

49. Ms. Zervos was concerned about the upcoming meeting with auditors and was afraid that Ms. Leahy would berate her at this meeting. Ms. Zervos became so distressed and anxious that she was unable to join the call.

50. The next day, October 31, 2023, Ms. Zervos was called into a meeting with HR by Mr. Solana to purportedly discuss her performance review, in which she was abruptly told that she was being terminated.

51. On November 2, 2023, Ms. Zervos received a termination letter from Mr. Solana which falsely claimed that she had failed the initial evaluation period ("IEP"). This was blatantly false as Mr. Solana had explicitly told Ms. Zervos in the week of October 9, 2023, that she had in fact "passed" the IEP "with flying colors."

52. Moreover, in the October 31, 2023, termination meeting, Ms. Zervos pointed out that she had never received any corrective actions, to which Mr. Solana agreed.

53. Despite being callously terminated, Ms. Zervos implored HR to protect her team from being mistreated and bullied by Ms. Leahy.

54. The Center knowingly permitted Ms. Leahy to openly make derogatory and racist remarks towards Ms. Zervos and other minority employees without repercussion, while ignoring its obligations to seriously investigate Ms. Zervos's repeated complaints. Instead, VOA terminated Ms. Zervos's employment for no valid reason mere days after she engaged in protected activity.

FIRST CAUSE OF ACTION
DISCRIMINATION UNDER TITLE VII
Against Defendant VOA

55. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if said paragraphs were fully set forth herein at length.

56. Based on the facts alleged herein, Defendant VOA has engaged in unlawful employment practices prohibited by Title VII by discriminating against Plaintiff because of her national origin (Greek) which created a hostile work environment.

57. As a result of the acts and conduct complained of herein, Plaintiff has suffered, and will continue to suffer, damages, including, but not limited to, economic and pecuniary losses (past and future) – such as income, salary, bonuses, and other compensation that her employment entailed, severe emotional, psychological and physical stress, distress, anxiety, pain and suffering, the inability to enjoy life’s pleasures, and other non-pecuniary losses and special damages.

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

SECOND CAUSE OF ACTION
RETALIATION UNDER TITLE VII
Against Defendant VOA

59. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if said paragraphs were fully set forth herein at length.

60. Based on the facts alleged herein, Defendant VOA has engaged in unlawful employment practices prohibited by Title VII by retaliating against Plaintiff for engaging in protected activity by complaining of national origin-based discrimination and racially discriminatory comments her colleagues endured in their workplace.

61. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages, including, but not limited to, economic and pecuniary losses (past and future) – such as income, salary, bonuses, and other compensation that her employment entailed, severe emotional, psychological and physical stress, distress, anxiety, pain and suffering, the inability to enjoy life’s pleasures, and other non-pecuniary losses and special damages.

62. Accordingly, as a result of Defendant VOA’s conduct set forth herein, Plaintiff has been damaged and is entitled to maximum compensation available to her under this law, including, but not limited to, punitive damages.

THIRD CAUSE OF ACTION
DISCRIMINATION UNDER SECTION 1981
Against all Defendants

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

64. Pursuant to 42 U.S.C. §1981: “All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and should all be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind and to no other.”

65. Defendants engaged in unlawful employment practices prohibited by 42 USC §1981 against Plaintiff by discriminating against persons of color on the basis of their race.

66. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission, and other compensation that her employment entailed; severe emotional, psychological and physical stress, distress, anxiety

pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

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

FOURTH CAUSE OF ACTION
RETALIATION UNDER SECTION 1981
Against all Defendants

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

69. As described above, Defendants retaliated and/or discriminated against Plaintiff for engaging in protected activities pursuant to 42 U.S.C. § 1981, when she complained of racially discriminatory comments her colleagues endured in their workplace.

70. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer damages including but not limited to economic and pecuniary losses (past and future) – such as income, salary, benefits, bonuses, commission, and other compensation that her employment entailed; severe emotional, psychological and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

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

FIFTH CAUSE OF ACTION
DISCRIMINATION UNDER THE ADA
Against Defendant VOA

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

73. Based on the facts alleged herein, Defendant VOA engaged in unlawful employment practices prohibited by the ADA by discriminating against Plaintiff on the basis of her disability.

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

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

SIXTH CAUSE OF ACTION
DISCRIMINATION UNDER THE NYSHRL
Against Defendant VOA

76. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if said paragraphs were fully set forth herein at length.

77. New York State Executive Law § 296 states in pertinent part:

1(a). It shall be an unlawful discriminatory practice: For an employer or licensing agency, because of an individual's age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status, or domestic violence victim status, to refuse to hire or employ or to bar or to discharge from employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment.

78. Defendant engaged in an unlawful discriminatory practice by discriminating against Plaintiff with respect to the terms and conditions of her employment on the basis of her national origin (Greek) and disability which created a hostile work environment in violation of the New York State Human Rights Law.

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

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

SEVENTH CAUSE OF ACTION
RETALIATION UNDER THE NYSHRL
Against Defendant VOA

81. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if said paragraphs were fully set forth herein at length.

82. New York State Executive Law § 296 states in pertinent part:

7. It shall be an unlawful discriminatory practice for any person engaged in any activity to which this section applies to retaliate or discriminate against any person because he or she has opposed any practices forbidden under this article or because he or she has filed a complaint, testified, or assisted in any proceeding under this article.

83. As described above, Defendant retaliated and/or discriminated against Plaintiff for engaging in protected activities pursuant to the NYHSRL, by unlawfully terminating her employment, in violation of the NYSHRL.

84. As a result of the acts and conduct complained of herein, Plaintiff has suffered, and will continue to suffer, damages including, but not limited to, economic and pecuniary losses;

severe emotional, psychological, and physical stress, distress, anxiety, pain and suffering; the inability to enjoy life's pleasures; and other non-pecuniary losses and special damages.

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

EIGHTH CAUSE OF ACTION
AIDING AND ABETTING UNDER THE NYSHRL
Against the Individual Defendants

86. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if said paragraphs were fully set forth herein at length.

87. New York State Executive Law § 296(6) provides that it shall be an unlawful discriminatory practice: "For any person to aid, abet, incite compel or coerce the doing of any acts forbidden under this article, or attempt to do so."

88. The Individual Defendants engaged in unlawful discriminatory practices in violation of New York State Executive Law § 296(6) by aiding, abetting, inciting, compelling, and coercing discriminatory and retaliatory conduct against Plaintiff.

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

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

NINTH CAUSE OF ACTION
DISCRIMINATION UNDER THE NYCHRL
Against all Defendants

91. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if said paragraphs were fully set forth herein at length.

92. New York City Administrative Code § 8-107 provides that:

1. It shall be an unlawful discriminatory practice: (a) For an employer or an employee or agent thereof, because of the actual or perceived age, race, creed, color, national origin, gender, disability, marital status, sexual orientation or alienage or citizenship status of any person, to refuse to hire or employ or to bar or to discharge from employment such person or to discriminate against such person in compensation or in terms, conditions, or privileges of employment.

93. Defendants violated the NYCHRL by discriminating against Plaintiff with respect to the terms and conditions of her employment on the basis of her national origin (Greek) and disability which created a hostile work environment in violation of the New York City Human Rights Law.

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

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

TENTH CAUSE OF ACTION
RETALIATION UNDER THE NYCHRL
Against all Defendants

96. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint as if said paragraphs were fully set forth herein at length.

97. New York City Administrative Code § 8-107 provides that:

7. It shall be unlawful discriminatory practice: For an employer [...] to discriminate against any person because such person has opposed any practices forbidden under this chapter [...]

98. Defendants engaged in an unlawful discriminatory practice by retaliating against Plaintiff for engaging in protected activities pursuant to the NYCHRL, by unlawfully terminating Plaintiff's employment.

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

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

ELEVENTH CAUSE OF ACTION
AIDING AND ABETTING UNDER NYCHRL
Against The Individual Defendants

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

102. The New York City Administrative Code § 8-107(6) provides that it shall be unlawful discriminatory practice:

“for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden under this chapter, or attempt to do so.”

103. The Individual Defendants engaged in unlawful discriminatory and retaliatory practices in violation of New York City Administrative Code § 8-107(6) by aiding, abetting, inciting, compelling, and coercing the above discriminatory, unlawful and retaliatory conduct against Plaintiff.

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

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

WHEREFORE, Plaintiff respectfully requests a judgment against Defendants:

A. Declaring that Defendants engaged in unlawful employment practices prohibited under federal, state, and local laws by discriminating against Plaintiff on the basis of her national origin and disability, and retaliating against her on the basis of her complaints about race and national origin discrimination;

B. Awarding economic damages to Plaintiff;

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

D. Awarding Plaintiff punitive damages;

E. Awarding Plaintiff attorney's fees, costs, and expenses incurred in the prosecution of the action; and

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

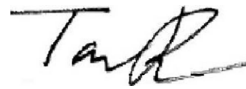
JURY DEMAND

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

Dated: September 23, 2025
White Plains, New York

Respectfully submitted,

FILIPPATOS PLLC



By: _____

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