

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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ABEL QUINTANA,

Plaintiff,

Case No.: 2:26-cv-05425

-against-

COMPLAINT

VALLEY HEALTH SYSTEM, INC.

Jury Trial Demanded

Defendant.
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Plaintiff, Abel Quintana, by and through his undersigned counsel, Filippatos PLLC, as and for his Complaint in this action against Defendant Valley Health System, Inc. (“Valley Health”), hereby alleges as follows:

NATURE OF THE CASE

1. Plaintiff Abel Quintana, a dedicated Systems Analyst in the Information Technology (“IT”) field, was subjected to multiple instances of discriminatory treatment based on his gender (male), sexual orientation (bi-sexual), and status as a domestic violence survivor at his former employer, Valley Health System, Inc. When Mr. Quintana reported the discriminatory treatment he endured to Valley Health’s Human Resources Department (“HR”), Valley Health became increasingly hostile and retaliatory, culminating in Mr. Quintana’s termination.

2. As a result of Valley Health’s unlawful conduct, Mr. Quintana brings this action seeking injunctive, declaratory, and monetary relief against Valley Health for violating his rights pursuant to Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17; the New Jersey Law Against Discrimination (“NJLAD”), N.J.S.A. 10:5-1 et seq.; and the New Jersey Security and Financial Empowerment Act (“NJ SAFE Act”), N.J.S.A. 34:11C-1 et seq.

JURISDICTION AND VENUE

3. This Court has federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff is asserting claims arising under federal law, specifically Title VII.

4. This Court has supplemental jurisdiction over Plaintiff's NJLAD and NJ SAFE Act claims pursuant to 28 U.S.C. § 1367.

5. Venue in the District of New Jersey is proper pursuant to 28 U.S.C. § 1391 because Defendant is headquartered in Ridgewood, New Jersey. Moreover, a substantial part of the events and omissions giving rise to the claims occurred in this district.

ADMINISTRATIVE PREREQUISITES

6. Plaintiff has satisfied all administrative prerequisites for the filing of this action.

7. Prior to the filing of this action, Plaintiff timely filed a Charge of Discrimination with the U.S. Equal Employment Opportunity Commission ("EEOC") alleging unlawful gender discrimination and retaliation.

8. The EEOC thereafter issued Plaintiff a Notice of Right to Sue dated February 12, 2026.

9. This action is filed within ninety (90) days of Plaintiff's receipt of that Notice.

10. Accordingly, Plaintiff has exhausted all required administrative remedies prior to bringing this suit.

PARTIES

11. At all times relevant hereto, Plaintiff has been a resident of the State of New Jersey, County of Hudson.

12. At all times relevant hereto, Defendant was and is a nonprofit organization maintaining its principal place of business at 223 N Van Dien Ave, Ridgewood, New Jersey 07450.

13. Upon information and belief, Defendant employs approximately 3,700 employees on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

14. At all relevant times hereto, Plaintiff was an employee of Defendant under all relevant statutes.

15. Plaintiff is a 49-year-old bisexual male and domestic violence survivor.

FACTUAL ALLEGATIONS

A. Plaintiff is Hired by Valley Health

16. Prior to joining Valley Health, Plaintiff built an impressive career in healthcare technology, specializing in critical systems implementation and support. At Montefiore Health System (“Montefiore”), Plaintiff successfully resolved complex technical issues and implemented crucial healthcare systems. As a systems manager, Plaintiff transformed noninvasive cardiology at Montefiore by collaborating with the department chair to successfully improve electrocardiograms’ compliance from 50% to 98%, reversing six years of low compliance. Plaintiff excelled in Cath Lab operations and built strong professional relationships with doctors, nurses, and key vendors, including Biosense Webster, GE Healthcare, and Phillips Healthcare.

17. Plaintiff joined Valley Health in January 2023 as an Application Analyst with an initial annual salary of \$99,999, later adjusted to \$51.00 per hour.

18. From the outset, Plaintiff proved his value to the organization, quickly identifying and resolving security and other issues that had troubled the system for months.

19. Plaintiff’s expertise was particularly evident in his collaboration with vendors like Biosense Webster, with whom he had previously worked at Montefiore, successfully resolving complex technical issues that had persisted at Valley Health.

B. Plaintiff Faces Discrimination Based on His Sexual Orientation and Disclosure of Status as a Domestic Violence Survivor

20. Valley Health's pattern of discriminatory and retaliatory treatment of Plaintiff began almost immediately upon Plaintiff joining Valley Health.

21. In February 2023, within his first three weeks of employment, Plaintiff encountered the Company's hostile attitude toward LGBTQ+ employees.

22. Stiberson Maldonado, a Senior Analyst on Plaintiff's team, launched into an overtly homophobic tirade in front of Plaintiff and a new employee named Khem Chandool, declaring, **"I can detect who is a faggot; I have always had that ability. It's like I can tell from how they dress. I can almost smell a faggot."**

23. In response to this blatantly homophobic statement, Mr. Chandool remarked, "I just started... and I am doing my HR training on discrimination right now on my computer."

24. Plaintiff addressed Mr. Maldonado's comments by stating, "Stiberson, that is not accurate. There are men who are very masculine and gay and there are men who are very feminine and straight."

25. Rather than acknowledge his inappropriate behavior, Mr. Maldonado simply walked out of the room.

26. Mr. Quintana would later learn that Mr. Maldonado had a documented history of homophobic behavior within the workplace.

27. Specifically, in August 2022, in response to a comment made by Alex Henao, another Senior Analyst, in a group message on Microsoft Teams ("I can't believe that guy said I didn't get the lunch special because I didn't order the soup."), Mr. Maldonado circulated a meme with the caption **"Gayyyyyy!"**, implying, derogatorily, that the person to whom Mr. Henao was referring was gay.

28. When Plaintiff later presented this prior homophobic Microsoft Teams message sent by Mr. Maldonado to HR, along with a detailed explanation of Mr. Maldonado's homophobic verbal comments, HR's response was dismissive.

29. HR waited days to ask Plaintiff about the "context" of the Microsoft Teams conversation, demonstrating a clear lack of interest in investigating discriminatory behavior by Valley Health employees.

30. Later, in December 2023, Plaintiff informed HR that he was a survivor of domestic violence.

31. He also informed Application Specialist, Patricia DiFranco, of his domestic violence survivor status. In response, Ms. DiFranco dismissively remarked that she thought Plaintiff was reporting his domestic abuse to get some kind of "benefit."

32. Notably, when Plaintiff was hired, his Manager, Aneta Chrostowski, told him that he would be working under Ms. DiFranco with respect to the work he performed on non-imaging-based systems and programs. As such, Ms. DiFranco had supervisory authority over Plaintiff despite not holding a supervisor title.

33. A few months later, on May 28, 2024, Plaintiff responsibly reported to HR that he was facing serious personal safety concerns.

34. Specifically, Plaintiff informed HR that he was receiving threats from his domestic abuser who discovered where he worked.

35. Plaintiff's disclosure was made both to protect himself and his colleagues who share a workplace.

36. Valley Health's response was unsupportive and actively hostile.

37. On, May 30, 2024, Ms. Chrostowski, Plaintiff's manager, called Plaintiff into a meeting where she demonstrated shocking insensitivity to his situation by probing inappropriately into Plaintiff's personal life, asking "Tell me how is your family?" and "How is your daughter?" Plaintiff explained how his child's mother discovered where he worked and was threatening to get him fired. Plaintiff also mentioned how she previously threatened a judge and daycare providers and expressed his concerns about the safety of his colleagues.

38. Ms. Chrostowski cruelly and dismissively responded: "Ughh, you picked a winner!"

39. When Mr. Quintana explained how his abuser had worked as a family case planner with Child Protective Services in New York, Ms. Chrostowski dismissively responded, "Sure, okay," further pooh-poohing Plaintiff's concerns in a cold manner that made clear her indifference to his safety.

C. Plaintiff Performs Exceptionally Well Despite Experiencing Ongoing Hostility, Retaliation, and Discrimination Based on His Sexual Orientation

40. Valley Health retaliated against Plaintiff immediately after he disclosed his status as a domestic abuse survivor and his concerns for his safety.

41. On June 13, 2024, Ms. Chrostowski issued Plaintiff a performance review that contained alleged performance issues that were demonstrably false and contradicted by Plaintiff's documented success.

42. Ms. Chrostowski made claims such as: "The team says you do not talk to anyone except if you have questions" and claimed without further proof that "Pat says that when people ask for help they say whatever you do, do not send [the question] Abel."

43. However, contrary to these disingenuous criticisms, Valley Health's management and executive leadership had already issued Plaintiff awards for Customer Service, Safety, Service

and Reliability. Plaintiff also had a documented history of successfully collaborating with colleagues.

44. On June 13, 2024, Plaintiff lodged another complaint of retaliation with HR noting that since his last complaint, the mistreatment and retaliation had continued and was now being perpetuated by Ms. DiFranco as well. Plaintiff's complaint made clear that both Ms. Chrostowski and Ms. DiFranco were treating Plaintiff differently than his peers because of his domestic violence survivor status.

45. On June 14, 2024, Plaintiff further objected to Ms. Chrostowski's retaliatory and hostile treatment by requesting a transfer to a different department.

46. In his transfer request, Plaintiff detailed how Ms. Chrostowski's discriminatory actions regarding his domestic violence survivor status were causing him emotional harm and interfering with his ability to perform his job.

47. That same day, the retaliatory campaign intensified when Ms. DiFranco, who also scoffed at Plaintiff's status as domestic violence survivor, falsely blamed Plaintiff for a systems failure involving MUSE, a vender application that receives electrocardiogram ("EKG") and stress-test order numbers for Valley Health cardiovascular patients.

48. The truth was that Plaintiff was the one who detected serious patient safety issues concerning MUSE in June 2024 that were caused by *Ms. DiFranco*. In fact, Chief Information Officer, Eric Carey, expressed concern about how the Hospital had not been aware of these patient safety issues until they were discovered by Plaintiff.

49. Additionally, following a training session in which a specialist from GE Healthcare performed certain demonstrations within GE Healthcare's test environment, Ms. DiFranco falsely

blamed Plaintiff for systems issues that resulted from alleged changes Plaintiff made during the training session.

50. This accusation was provably false for several reasons. First, the training took place entirely within GE's test environment, making it technically impossible for it to affect Valley Health live production systems.

51. Second, Ms. DiFranco failed to follow standard protocol by first opening a ticket for a systems issue to be investigated rather than cast blame on an analyst without proof.

52. Third, Ms. DiFranco later walked back her accusations, writing to Ms. Chrostowski: "Please hold on this for now. I will reach out after we have done further research." Following this exchange, Plaintiff received no update about his alleged mistake. In other words, Ms. DiFranco attempted to fabricate performance issues against Plaintiff immediately after he made protected complaints to HR.

53. Recognizing this pattern of troubling behavior, Plaintiff again complained about Ms. DiFranco's conduct to HR two days later, on June 16, 2024.

54. Plaintiff reported the numerous instances in which Ms. DiFranco caused systems to malfunction, and his fear that Ms. DiFranco would try to blame him for these issues as a form of retribution for his prior complaints of unlawful treatment.

55. Plaintiff's concerns proved to be well-founded as Ms. DiFranco continued to blame Plaintiff for systems problems that were either nonexistent or caused by others.

56. Rather than investigate Plaintiff's documented concerns regarding Ms. DiFranco's retaliatory behavior, HR allowed the conduct to continue unchecked, further contributing to the hostile work environment that Plaintiff was forced to endure.

57. The discriminatory treatment intensified on June 17, 2024, when Plaintiff faced blatantly unequal treatment with respect to the application of Valley Health’s attendance policies.

58. Ms. Chrostowski harshly reprimanded Plaintiff for arriving at work just one minute late. In contrast, Ms. Chrostowski permitted Jonathan Then, another Senior Analyst, to arrive late to work multiple days a week after dropping his nephew off at school.

59. Ms. Chrostowski knew that Plaintiff was a single father and needed to drop off his child at school every day before work but refused his request for a short grace period of a few minutes to arrive to work, stating, “I cannot treat you differently because we all have to be held accountable to the same standards.” Notably, Plaintiff was assured by Ms. Chrostowski at the time of his hiring that she would not be micromanaging his attendance as a salaried employee and that there would be no issues if he arrived a few minutes late if necessary.

60. The retaliation against Plaintiff continued into late June 2024, when Ms. Chrostowski, Ms. DiFranco, and Nicholas Perrone, Systems Analyst, began to systematically exclude Plaintiff from crucial project meetings, while simultaneously restricting his access to systems.

61. Specifically, on June 26, 2024, Plaintiff discovered that a critical meeting with a vendor named Siemens attended by Mr. Perrone, Ms. Chrostowski and Ms. DiFranco had taken place without his knowledge or participation, even though he was the primary lead on the project.

62. The meeting in question concerned essential testing and mapping procedures—information vital for Plaintiff to effectively perform his job duties. Upon information and belief, Ms. Chrostowski and Ms. DiFranco deliberately excluded Plaintiff from this meeting to create a knowledge gap, which could later be used to question Plaintiff’s technical competence.

63. The coordinated nature of the retaliation became even more apparent when Plaintiff began to experience unprecedented restrictions on his access to systems.

64. Valley Health suddenly made multiple technical environments and testing platforms, which were essential for his job responsibilities, inaccessible to Plaintiff, marking a dramatic shift from his prior unrestricted access.

65. The timing and comprehensive nature of these access restrictions strongly indicated a coordinated effort to hinder Plaintiff's ability to perform his job.

66. On June 28, 2024, in light of these escalating retaliatory actions, Plaintiff again requested a transfer to another manager. In his request, Plaintiff opposed Ms. Chrostowski's and Ms. DiFranco's discriminatory and retaliatory treatment towards him. He also detailed how he had been denied access to necessary testing systems and excluded from critical meetings and had his access to systems revoked, severely impacting his ability to fulfill his job responsibilities.

67. In response, Valley Health failed to address Plaintiff's request for a new manager, sanctioning the hostile work environment to persist and intensify.

68. Tellingly, on June 30, 2024, Director of HR, Lissette Valetin-Green, told Plaintiff: "If I transfer you to another department, are you going to file another complaint?" Plaintiff confirmed that he would, "If it continues." Ms. Green replied: "If you want to move, you should apply for another position." Plaintiff explained how he could not find any open positions to which to apply.

69. In July 2024, the hostile work environment worsened as Plaintiff faced more direct interference with his ability to perform his job.

70. For example, on or about July 1, 2024, Plaintiff spent several hours working with Siemens Healthcare to correct an issue caused by Mr. Perrone immediately before Mr. Perrone went on vacation, effectively preventing Plaintiff from doing his job.

71. Plaintiff, who was assigned to complete some of Mr. Perrone's tasks while Mr. Perrone was on vacation, learned that Mr. Perrone altered a service account for a Siemens Healthcare medical imaging application that stores patient medical images obtained from Valley Health's medical imaging devices. Mr. Perrone created a new service account and removed an old one without informing his teammates, which immediately affected Plaintiff's ability to complete proper testing to ensure that the Siemens application was responding correctly to Valley Health's medical imaging devices. When questioned about the altered account, Mr. Perrone fabricated an excuse claiming, "we should not use the service account" (the account previously used), and alleged that the account he created still worked.

72. Mr. Perrone's actions materially interfered with Plaintiff's ability to conduct necessary testing by removing access to essential tools. Mr. Perrone altered the account and subsequently took a week-long vacation, during which time the account remained nonfunctional and consistently generated errors whenever Plaintiff attempted to perform his duties.

73. Additionally, Siemens Healthcare confirmed that this disruption could result in delays to patient care since it would have blocked Siemens from being able to provide back-end technical support if needed, again raising patient safety concerns much like the issues with the EKGs, through no fault of Plaintiff's.

74. After working with Siemens, Plaintiff was able to correct Mr. Perrone's erroneously created service account and complete the necessary tests.

75. Ms. Chrostowski, Ms. DiFranco, and Mr. Perrone also excluded Plaintiff from crucial technical team collaborations and project-related emails, continuing their retaliatory pattern of isolating Plaintiff from important technical discussions.

76. Later that day, Plaintiff filed a detailed written complaint to HR Business Partner Keri Galuppo describing the ways in which he was being excluded from work-related events and functions, including the June 26, 2024, Siemens engineering meeting.

77. The situation had become so untenable that Plaintiff requested to be provided a “safe space” due to Ms. Chrostowski's continued retaliation.

78. Plaintiff's request was completely ignored.

79. Additionally, in July 2024, during a Microsoft Teams meeting, Ms. DiFranco inappropriately asked Plaintiff about his sexual orientation: **“I wanted to ask you if you were gay? Not that it bothers me or would care.”**

80. When Plaintiff asked to know why she was making such an inquiry, Ms. DiFranco's responded by revealing her discriminatory thought process: **“Because you don't see a lot of single fathers [who are gay].”**

81. Ms. DiFranco's preoccupation with employees' sexual orientation manifested again in her comments about a new hire named Elliot (last name unknown), when she stated: **“I met the new hire Elliot yesterday, and I think he is gay.”** When Plaintiff questioned her about the basis for her assumption, she replied: **“Because my gaydar is never wrong.”**

82. The following day, after HR sent a department-wide email introducing newly hired employees which confirmed that Elliot was married with children, Ms. DiFranco made it a point to approach Plaintiff to tell him: **“Did you see the department email for Elliot? I guess my**

gaydar was wrong,” further highlighting her inappropriate fixation on employees' sexual orientations.

83. In July 2024, Plaintiff sent multiple complaints to HR about the gender discrimination and differential treatment he was experiencing based on his sex, about being humiliated in front of vendors at meetings, and about his shock that Mr. Maldonado's documented homophobic actions were being completely dismissed and ignored.

84. Ms. Chrostowski immediately retaliated against Plaintiff by maliciously marking Plaintiff's previously approved time off requests as "PTO-NS" (not scheduled) instead of "PTO-S" (scheduled) – which meant that the time off counted against his attendance record and could trigger disciplinary action.

85. Notably, Ms. Chrostowski targeted the time that Plaintiff took off to receive domestic violence services.

86. For instance, Plaintiff was given approved leave for July 22, 23, and 24, 2024 for therapy sessions, court appearances, and other matters related to addressing domestic abuse, but this PTO was retroactively altered from "scheduled" to "unscheduled" absences, penalizing Plaintiff for utilizing leave for domestic violence-related services.

87. On August 16, 2024, Plaintiff submitted a complaint to Jose Balderrama, the Senior Vice President of HR, and Ms. Green regarding the ongoing and systematic denial of training and educational opportunities he faced compared to his colleagues.

88. Plaintiff made clear that despite achieving the same performance results, he was consistently being excluded from several key professional development activities.

89. For instance, while other team members were allowed to attend crucial technical meetings related to testing and mapping processes, and to educational sessions about GE Healthcare's systems, Plaintiff was not given the same opportunities.

90. Ms. Chrostowski denied Plaintiff from attending training sessions and receiving materials that were made available to other team members, hindering Plaintiff's ability to remain current with technical requirements, jeopardizing his career progression and job performance.

91. On August 19, 2024, after HR failed to adequately respond to his complaints of discrimination, Plaintiff complained about the ongoing discrimination and retaliation to Senior Vice President of Operations, Karteek Bhavisar.

92. On August 20, 2024, after HR attempted to deflect and minimize Plaintiff's concerns by focusing solely on workflow issues, Plaintiff sent a follow-up correspondence to HR, copying Ms. Andrea Valtos, Vice President of Information Systems, Mr. Balderrama and Mr. Bhavsar, detailing his discriminatory exclusion from training and educational opportunities.

D. Plaintiff's Complaints Continue to Fall on Deaf Ears, With the Onslaught of Discrimination, Hostile Treatment, and Retaliation Culminating in His Termination

93. On September 10, 2024, Plaintiff applied for an analytics position within Valley Health's Heart and Vascular Institute to find a less hostile place to work.

94. Plaintiff was uniquely qualified for this role, having recently developed advanced analytics solutions for the Heart and Vascular Institute under the guidance of Lauren Dietch, Director of the Heart and Vascular Institute.

95. Specifically, Ms. Dietch requested Plaintiff's expertise in connection with analytics work that was typically handled by someone in a more senior role. In this capacity, Plaintiff created sophisticated data analysis solutions for the Heart and Vascular Institute, developing pivot tables and charts, and establishing new metrics for measuring visits and patient counts.

96. At the time, the Heart and Vascular Institute lacked a clear vision on how to quantify crucial operational metrics, including patient visit tracking, departmental efficiency measures, and resource utilization rates. Plaintiff created and established these data points through his own initiative and expertise. The department went on to implement Plaintiff's innovative analytics solutions across its operations, further underscoring the pretextual nature of Valley Health's performance criticisms of him.

97. Although Plaintiff had received direct encouragement from Ms. Green to apply for the analytics position within the Heart and Vascular Institute, on September 11, 2024, during a meeting that had not appeared on Plaintiff's calendar prior to his application to the Heart and Vascular Institute, Ms. Chrostowski placed Plaintiff on a Performance Improvement Plan ("PIP") in a retaliatory move to impede his application for the new role.

98. The PIP contained numerous false allegations and misrepresentations as to Plaintiff's performance.

99. Indeed, each entry in the PIP appeared to have been hastily created after Plaintiff applied for the position within the Heart and Vascular Institute and was designed to disqualify him from a role for which he was highly qualified.

100. Later that day, Plaintiff submitted a formal response to his PIP to HR, specifically noting its retaliatory nature in connection with his application for the analytics position.

101. Prior to being placed on the PIP, Plaintiff had been performing well.

102. He was rated by Ms. Chrostowski in his 2023 Performance Review as "Achieves Expectations," and received overwhelmingly positive feedback about his performance and ability to handle challenges he faced with teammates.

103. Additionally, from February 2023 through September 2024, Plaintiff was regularly recognized with “Be the Key” certificates for safety, service and reliability, which were only issued to Valley Health employees who went above and beyond their everyday responsibilities to enhance safety, provide excellent service, and improve reliability.

104. Plaintiff even received numerous “Be the Key” certificates from Ms. Chrostowski, as well as positive accolades from Michael Burke, Assistant Vice President of Information Systems.

105. Additionally, just days before he was issued a retaliatory PIP, Plaintiff had received a “Be The Key” award from Colleen Deery, manager for the Cardiac Rehabilitation and Ultrasound Department, for managing the entire department’s move from the Ridgewood Hospital campus to Paramus Hospital, as well as a personal commendation from Senior Vice President Julia Karcher for his outstanding work. Plaintiff had supported the department’s move by mapping out the entire department’s IT and clinical applications infrastructure for duplication following the move, which included medical and testing equipment and computer technology necessary for the department to run.

106. The timing of this recognition, followed immediately by retaliatory actions, starkly demonstrates the pretextual nature of the Company's subsequent performance complaints.

107. In addition to his formal challenge to the inaccuracies contained in the PIP, on September 13, 2025, Plaintiff again submitted a complaint to the HR Director and HR Business Partner about being denied access to testing systems and being ignored by Ms. Chrostowski when seeking assistance.

108. The situation reached a crisis point by September 20, 2024, when Plaintiff sent multiple communications documenting the increasingly hostile environment to which he was being

subjected based on his gender and domestic violence survivor status, and the pattern of homophobic behavior by senior employees in positions of influence, particularly Mr. Maldonado..

109. However, HR dismissed Plaintiff's concerns and, unsurprisingly, told Plaintiff that the HR investigation did not yield any information in support of Plaintiff's claims of retaliation.

110. The emotional toll of the continued discrimination and retaliation to which Plaintiff was subjected became so severe that Plaintiff sent an email to Ms. Green articulating his extreme emotional distress from the abuse he was experiencing.

111. The content of this email alarmed the Company so much that Ms. Green contacted Employee Health & Wellness and requested that a nurse perform an immediate wellness check on Plaintiff, with Ms. Green on the call.

112. During this wellness check, Plaintiff provided detailed accounts of the homophobia he had experienced and the retaliation he encountered after disclosing his domestic violence survivor status.

113. While the nurse promised to conduct weekly follow-up calls to monitor Plaintiff's mental health and well-being, no such check-ins ever materialized.

114. Plaintiff later learned that the Director of Nursing (who, unlike Ms. Green from HR, was not on the wellness check call) directed the treating nurse not to follow up with Plaintiff in direct contravention of what the treating nurse had recommended.

115. Plaintiff's complaints to Employee Health & Wellness would prove to be the death knell for Plaintiff's employment at Valley Health.

116. During an October 8, 2024, meeting convened to discuss Plaintiff's PIP, Plaintiff addressed his concerns about the ongoing retaliation and discrimination he was experiencing.

117. However, instead of focusing on a solution to these legitimate issues, Ms. Chrostowski, Ms. Galuppo, and Ms. Valtos, presented a fabricated claim against Plaintiff regarding an alleged unresolved training issue from months prior.

118. Two months earlier, Plaintiff had been asked to assist two employees who were experiencing issues copying certain patient reports into the Hospital's system. These issues had nothing to do with a system-wide technical issue, but rather, with how the system was programmed to recognize text that was copied and pasted into a patient's report. Plaintiff worked with these employees, discovered the system's inability to recognize certain text, and rectified the employees' issues. Nevertheless, when another employee experienced the same issue weeks later, Plaintiff was baselessly blamed. When Plaintiff explained that this was not a systems issue but caused by how employees continued to erroneously paste unrecognizable text into patient reports, Plaintiff's explanation was dismissed and he was unreasonably reprimanded for not solving the problem.

119. In fact, Plaintiff successfully resolved the original training issue, and the new employees simply needed to receive the same standard training that had been given to their predecessors.

120. This fabricated claim was an unfounded and highly exaggerated excuse, manufactured to justify Defendant's unlawful decision to terminate Plaintiff's employment, which occurred on October 8, 2024.

FIRST CAUSE OF ACTION
(Discrimination and Hostile Work Environment in Violation of Title VII)

121. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

122. Title VII prohibits employers from discriminating against employees because of their gender and sexual orientation.

123. Title VII further prohibits a workplace permeated with discriminatory intimidation, ridicule and insult that is sufficiently severe or pervasive to alter the conditions of the victim's employment and create an abusive working environment.

124. Plaintiff, who is a bisexual man, was qualified for his role, consistently performed his job duties and received positive performance accolades throughout his employment while he was subjected to disparate treatment because of his gender and sexual orientation.

125. Defendant denied Plaintiff equal terms and conditions of employment, including terminating Plaintiff shortly after he complained of discriminatory treatment.

126. Defendant's actions constitute unlawful gender and sexual orientation discrimination in violation of Title VII.

127. Defendant's conduct as described herein constitutes a hostile work environment given the pervasive discrimination Plaintiff was subjected to on the basis of his gender and sexual orientation which only escalated after Plaintiff's protected complaints to HR and culminated in Plaintiff's termination.

128. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and continues to suffer, harm for which he is entitled to an award of monetary damages to the greatest extent permitted by law, including, but not limited to, monetary and/or economic harm.

129. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and will continue to suffer harm, including but not limited to, loss of future employment opportunities, humiliation, embarrassment, reputational harm, emotional and physical distress, mental anguish and other economic and non-economic damages.

130. The conduct of Defendant described above was willful, wanton, and malicious. At all relevant times, Defendants acted with conscious disregard for Plaintiff's rights and feelings, acted with knowledge or with reckless disregard that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause physical injury, fear, and/or pain and suffering to Plaintiff. As described herein, Plaintiff is entitled to recover punitive damages.

131. Plaintiff is entitled to all legal and equitable remedies available for violations of Title VII, including compensatory damages, attorneys' fees and costs and other appropriate relief.

SECOND CAUSE OF ACTION
(Retaliation in Violation of Title VII)

132. Plaintiff repeats, reiterates, and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

133. Plaintiff engaged in protected activity under Title VII when he complained internally about discrimination on the basis of his gender and sexual orientation.

134. Defendant retaliated against Plaintiff by ignoring his multiple complaints of discrimination, culminating in terminating his employment shortly after his complaints of discrimination.

135. Defendants' actions constitute unlawful retaliation under Title VII.

136. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and continues to suffer, harm for which he is entitled to an award of monetary damages to the greatest extent permitted by law, including, but not limited to, monetary and/or economic harm.

137. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and will continue to suffer harm, including but not limited to, loss of future employment

opportunities, humiliation, embarrassment, reputational harm, emotional and physical distress, mental anguish and other economic and non-economic damages.

138. The conduct of Defendant described above was willful, wanton, and malicious. At all relevant times, Defendants acted with conscious disregard for Plaintiff's rights and feelings, acted with knowledge or with reckless disregard that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause physical injury, fear, and/or pain and suffering to Plaintiff. As described herein, Plaintiff is entitled to recover punitive damages.

139. Plaintiff is entitled to all legal and equitable remedies available for violations of Title VII, including compensatory damages, attorneys' fees and costs and other appropriate relief.

THIRD CAUSE OF ACTION
(Discrimination and Hostile Work Environment in Violation of the NJLAD)

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

141. This claim is authorized and instituted pursuant to the New Jersey Law Against Discrimination ("NJLAD"), N.J.S.A. 10:5-1 et seq., including N.J.S.A. 10:5-12(a) and (s), which make it an unlawful employment practice to discriminate in employment on the basis of gender and sexual orientation.

142. The NJLAD further prohibits a workplace permeated with discriminatory intimidation, ridicule and insult that is sufficiently severe or pervasive to alter the conditions of the victim's employment and create an abusive working environment.

143. Plaintiff, who is a bisexual man, was qualified for his role, consistently performed his job duties and received positive performance accolades throughout his employment while he was subjected to disparate treatment because of his gender and sexual orientation.

144. Defendant denied Plaintiff equal terms and conditions of employment, including terminating Plaintiff shortly after he complained of discriminatory treatment.

145. Defendant's actions constitute unlawful gender and sexual orientation discrimination in violation of the NJLAD.

146. Defendant's conduct as described herein constitutes a hostile work environment given the pervasive discrimination Plaintiff was subjected to on the basis of his gender and sexual orientation which only escalated after Plaintiff's protected complaints to HR and culminated in Plaintiff's termination.

147. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and continues to suffer, harm for which he is entitled to an award of monetary damages to the greatest extent permitted by law, including, but not limited to, monetary and/or economic harm.

148. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and will continue to suffer harm, including but not limited to, loss of future employment opportunities, humiliation, embarrassment, reputational harm, emotional and physical distress, mental anguish and other economic and non-economic damages.

149. The conduct of Defendant described above was willful, wanton, and malicious. At all relevant times, Defendants acted with conscious disregard for Plaintiff's rights and feelings, acted with knowledge or with reckless disregard that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause physical injury, fear, and/or pain and suffering to Plaintiff. As described herein, Plaintiff is entitled to recover punitive damages.

150. Plaintiff is entitled to all legal and equitable remedies available for violations of the NJLAD, including compensatory damages, attorneys' fees and costs and other appropriate relief.

FOURTH CAUSE OF ACTION
(Retaliation in Violation of the NJLAD)

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

152. N.J.S.A. 10:5-12(d) provides that it shall be an unlawful employment practice for any person to retaliate or discriminate against any person because he or she has opposed any practices forbidden under the NJLAD or because he or she has filed a complaint, testified, or assisted in any proceeding under the NJLAD.

153. Defendant retaliated against Plaintiff by ignoring his multiple complaints of discrimination, culminating in terminating his employment shortly after his complaints of discrimination.

154. Defendants' actions constitute unlawful retaliation under Title VII.

155. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and continues to suffer, harm for which he is entitled to an award of monetary damages to the greatest extent permitted by law, including, but not limited to, monetary and/or economic harm.

156. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and will continue to suffer harm, including but not limited to, loss of future employment opportunities, humiliation, embarrassment, reputational harm, emotional and physical distress, mental anguish and other economic and non-economic damages.

157. The conduct of Defendant described above was willful, wanton, and malicious. At all relevant times, Defendants acted with conscious disregard for Plaintiff's rights and feelings, acted with knowledge or with reckless disregard that his conduct was certain to cause injury and/or

humiliation to Plaintiff, and intended to cause physical injury, fear, and/or pain and suffering to Plaintiff. As described herein, Plaintiff is entitled to recover punitive damages.

158. Plaintiff is entitled to all legal and equitable remedies available for violations of the NJLAD, including compensatory damages, attorneys' fees and costs and other appropriate relief.

FIFTH CAUSE OF ACTION
(Discrimination and Hostile Work Environment in Violation of the NJ SAFE Act)

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

160. The NJ SAFE Act provides at 34:11C-4 in relevant part that “an employer shall not discharge, harass or otherwise discriminate or retaliate or threaten to discharge, harass or otherwise discriminate or retaliate against an employee with respect to the compensation, terms, conditions or privileges of employment on the basis that the employee took or requested any leave to which the employee was entitled pursuant to section 3 of this act or on the basis that the employee refused to authorize the release of information deemed confidential pursuant to subsection f. of section 3 of this act.”

161. The NJ SAFE Act further prohibits a workplace permeated with discriminatory intimidation, ridicule and insult that is sufficiently severe or pervasive to alter the conditions of the victim's employment and create an abusive working environment.

162. Defendant subjected Plaintiff to dehumanizing and belittling comments regarding his status as a domestic violence survivor, which only escalated after Plaintiff lodged protected complaints as to the ongoing discriminatory treatment he faced by penalizing Plaintiff for taking protected leave for the purpose of utilizing domestic violence survivor services, all culminating in his termination shortly after his last complaint of discrimination.

163. By the conduct described herein, Defendant denied Plaintiff equal terms and conditions of employment, including terminating Plaintiff shortly after he complained of discriminatory treatment.

164. Defendant's actions constitute unlawful discrimination in violation of the NJ SAFE Act.

165. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and continues to suffer, harm for which he is entitled to an award of monetary damages to the greatest extent permitted by law, including, but not limited to, monetary and/or economic harm.

166. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered, and will continue to suffer harm, including but not limited to, loss of future employment opportunities, humiliation, embarrassment, reputational harm, emotional and physical distress, mental anguish and other economic and non-economic damages.

167. The conduct of Defendant described above was willful, wanton, and malicious. At all relevant times, Defendants acted with conscious disregard for Plaintiff's rights and feelings, acted with knowledge or with reckless disregard that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause physical injury, fear, and/or pain and suffering to Plaintiff. As described herein, Plaintiff is entitled to recover punitive damages.

168. Plaintiff is entitled to all legal and equitable remedies available for violations of NJ SAFE Act, including compensatory damages, attorneys' fees and costs and other appropriate relief.

SIXTH CAUSE OF ACTION
(Retaliation in Violation of the NJ SAFE Act)

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

170. The NJ SAFE Act provides at 34:11C-4 in relevant part that “an employer shall not discharge, harass or otherwise discriminate or retaliate or threaten to discharge, harass or otherwise discriminate or retaliate against an employee with respect to the compensation, terms, conditions or privileges of employment on the basis that the employee took or requested any leave to which the employee was entitled pursuant to section 3 of this act or on the basis that the employee refused to authorize the release of information deemed confidential pursuant to subsection f. of section 3 of this act.”

171. Defendant subjected Plaintiff to dehumanizing and belittling comments regarding his status as a domestic violence survivor, which only escalated after Plaintiff lodged protected complaints as to the ongoing discriminatory treatment he faced by penalizing Plaintiff for taking protected leave for the purpose of utilizing domestic violence survivor services, all culminating in his termination shortly after his last complaint of discrimination.

172. By the conduct described herein, Defendant retaliated against Plaintiff by terminating his employment shortly after complaining of discrimination based on his status as a domestic violence survivor.

173. As a direct and proximate result of Defendant’s unlawful conduct, Plaintiff has suffered, and continues to suffer, harm for which he is entitled to an award of monetary damages to the greatest extent permitted by law, including, but not limited to, monetary and/or economic harm.

174. As a direct and proximate result of Defendant’s unlawful conduct, Plaintiff has suffered, and will continue to suffer harm, including but not limited to, loss of future employment opportunities, humiliation, embarrassment, reputational harm, emotional and physical distress, mental anguish and other economic and non-economic damages.

175. The conduct of Defendant described above was willful, wanton, and malicious. At all relevant times, Defendants acted with conscious disregard for Plaintiff's rights and feelings, acted with knowledge or with reckless disregard that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause physical injury, fear, and/or pain and suffering to Plaintiff. As described herein, Plaintiff is entitled to recover punitive damages.

176. Plaintiff is entitled to all legal and equitable remedies available for violations of NJ SAFE Act, including compensatory damages, attorneys' fees and costs and other appropriate relief.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in his favor and against Defendant, containing the following relief:

A. A declaratory judgment that the actions, conduct and practices of Defendant complained of herein violate the laws of the United States and the State of New Jersey;

B. An injunction and order permanently restraining Defendant and its officers, officials, agents, successors, employees and/or representatives, and any and all persons acting in concert with them, from engaging in any such further unlawful conduct, including the policies and practices complained of herein;

C. An award of damages against Defendant, or any jointly or severally liable entity or person, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or economic damages;

D. An award of damages against Defendant, or any jointly or severally liable entity or person, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all non-monetary and/or compensatory damages, including, but not limited to, compensation for his emotional distress;

- E. An award of damages for any and all other monetary and/or non-monetary losses suffered by Plaintiff, including, but not limited to, loss of income, reputational harm and harm to professional reputation, in an amount to be determined at trial, plus prejudgment interest;
- F. An award of punitive damages, and any applicable penalties and/or liquidated damages in an amount to be determined at trial;
- G. Prejudgment interest on all amounts due;
- H. An award of costs that Plaintiff has incurred in this action, including, but not limited to, expert witness fees, as well as Plaintiff's reasonable attorneys' fees and costs to the fullest extent permitted by law; and,
- I. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

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

Dated: May 13, 2026
White Plains, New York

Respectfully submitted,

FILIPPATOS PLLC

By:  _____

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