UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRINAE SAENZ,

Plaintiff,

- against -

MANIPAL EDUCATION AMERICAS, LLC/ AMERICAN UNIVERSITY OF ANTIGUA, PETER BELL in his individual and professional capacity, SAM YOSPE in his individual and professional capacity, and SHEIKH SADIQ in his individual and professional capacity

Defendants.

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Case No.:

COMPLAINT

JURY TRIAL DEMAND

Plaintiff Trinae Saenz ("Plaintiff"), by and through her attorneys, Filippatos PLLC, hereby alleges against Defendants Manipal Education Americas, LLC/American University of Antigua ("MEA/AUA" or the "Company"), Peter Bell, Sam Yospe, and Sheikh Sadiq (together, the "Individual Defendants," collectively "Defendants") as follows:

NATURE OF THE CASE

1. This action arises from Defendants' discrimination, harassment, and retaliation against Plaintiff as well as their interference with Plaintiff's Family and Medical Leave ("FMLA") rights.

2. Mrs. Saenz is a highly competent, dedicated employee who so successfully handled MEA/AUA's Human Resource ("HR") functions, she was repeatedly promoted and offered raises; was awarded a senior executive position on the Leadership Council; and invited to participate in MEA/AUA's wealth bonus program.

3. It was only once Mrs. Saenz courageously reported Defendants' racial and gender

discrimination towards her and made whistleblower complaints at the end of 2024 that her career took an immediate nosedive, with Defendants choosing to retaliate against Mrs. Saenz rather than ameliorate its unlawful conduct.

4. Defendants' retaliation against Plaintiff included fabrication of performance and compliance issues, exclusion from HR-related discussions, a constructive demotion, and ultimately an unlawful termination on February 26, 2025—well within all applicable statutes of limitations.

5. Accordingly, Plaintiff brings this action against Defendants for violations of Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. § 2000e, *et seq*. (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) ("Title VII"); New York Labor Law § 740 ("NYLL § 740"); the New York State Human Rights Law, New York State Executive Law, § 296 *et seq.* ("NYSHRL") the New York City Human Rights Law, N.Y.C. Admin. Code § 8-107, *et seq*. ("NYCHRL"), and the Family and Medical Leave Act, 29 U.S.C. § 2601 *et seq.* ("FMLA").

6. As a direct and proximate result of Defendants' actions resulting in the sudden and permanent destruction of Plaintiff's professional identity, financial security, and many personal relationships, Plaintiff suffered and continues to suffer severe emotional distress, requiring psychiatric treatment for depression and anxiety.

7. Plaintiff seeks damages, as well as injunctive and declaratory relief, to redress the injuries she has suffered—physical, emotional and pecuniary—as a result of being discriminated and retaliated against by Defendants on the basis of her gender and race; as well as Defendants' unlawful retaliatory actions which violate New York State's Whistleblower Statutes, N.Y. Labor Law §§ 740(2) and 741(2); and the FMLA.

PARTIES, JURISDICTION, VENUE, AND ADMINISTRATIVE PREREQUISITES

8. At all times relevant hereto, Plaintiff Trinae Saenz ("Plaintiff" or "Mrs. Saenz") has been a resident of the State of New York and Westchester County.

9. At all times relevant hereto, Plaintiff was an employee of Defendant MEA/AUA.

10. At all times relevant hereto, Manipal Education Americas, LLC/American University of Antigua ("Defendant" "MEA/AUA" or the "Company") was and is an international for-profit organization maintaining its principal place of business at 115 Broadway, 5th Floor, New York, New York 10006.

11. Upon information and belief, Defendant MEA/AUA employs approximately 155 individuals on a full-time or full-time equivalent basis and thus is subject to all statutes upon which Plaintiff is proceeding herein.

12. Upon information and belief, at all times relevant hereto, Defendant Peter Bell is an individual residing in the State of New York, as well as an employee of MEA/AUA, holding the position of President.

13. Upon information and belief, at all times relevant hereto, Defendant Sam Yospe is an individual residing in the State of New York, as well as an employee of MEA/AUA, holding the positions of Vice President and General Counsel.

14. Upon information and belief, at all times relevant hereto, Defendant Sheikh Sadiq is an individual residing in the State of Illinois, holding the position of Senior VP of Strategy and Operations at MEA/AUA.

15. Upon information and belief, at all times relevant hereto, Individual Defendants had the authority to hire, terminate, and affect the terms and conditions of Plaintiff's employment or to otherwise influence decision-making regarding same.

16. This Court has subject matter jurisdiction over this matter pursuant to 28 USC § 1331.

17. This Court has supplemental jurisdiction over the claims Plaintiff has brought under state and city law pursuant to 28 USC § 1367.

18. Venue is proper in this district pursuant to 28 U.S.C. §1391(b)(2), as a substantial part of the acts complained of herein occurred in this district.

19. Plaintiff has satisfied all procedural prerequisites for the commencement of this action by: (a) timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC") on October 9, 2025; (b) receiving a Notice of Right to Sue ("NRTS") from the EEOC on May 14, 2026; and (c) commencing this action within 90 days of the NRTS.

MATERIAL FACTS

I. Mrs. Saenz' Exceptional Qualifications, Outstanding Performance, And Expanding Responsibilities At MEA/AUA.

10. Mrs. Saenz is a strategic Human Resources executive with over fifteen years of progressive experience with employee relations, compliance oversight, and company retirement programs across multiple industries.

11. Mrs. Saenz holds a bachelor's degree in business administration/management from St. John's University and maintains a Society for Human Resource Management Certified Professional ("SHRM-CP") certification.

12. Prior to being hired by Defendants, as Director of HR at Synergy Homecare, Plaintiff led multi-location HR strategy while managing compensation, benefits, and talent acquisition to support business growth.

13. Mrs. Saenz' HR expertise was further developed at the Davis Polk & Wardwell law firm, where she administered firm-wide benefits programs, conducted market analysis, and

processed payroll operations as a Benefits and Compensation Specialist.

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

15. Mrs. Saenz began her employment at MEA/AUA in 2013 as a Payroll & Benefits Coordinator with a starting salary of $45,000.

16. Throughout her tenure, Defendants repeatedly promoted and awarded Mrs. Saenz salary raises commensurate with her exceptional performance and increasing scope of responsibilities providing strategic leadership in workforce planning, global compensation, and organizational development.

17. Specifically, Defendants promoted Mrs. Saenz to Payroll and Benefits Manager in or around 2015; to Director of HR in 2017; to Executive Director of HR in 2018; to Associate Vice President of HR in 2019; and to Vice President of HR in 2021.

18. With her elevation to leadership beginning in 2019, MEA/AUA's senior leadership team directed Mrs. Saenz to focus less on transactional work and more on strategic leadership.

19. Mrs. Saenz' achievements at MEA/AUA include implementing a global job architecture framework, enhancing employee retention, and launching a wellness program serving domestic employees, Faculty and AUA students.

20. In all her roles at MEA/AUA, Mrs. Saenz was not only responsible for U.S.-based employees, but international and unionized workforces as well. She directly supported approximately eighty to a hundred Antigua-based faculty members; handling recruitment,

onboarding, benefits administration, payroll coordination, employee relations, terminations/retirements and compliance matters daily.

21. All of Mrs. Saenz' roles also required travel to Antigua to conduct in-person benefits meetings, oversee employee engagement initiatives, and provide on-site benefits support for faculty *and* a student population of about 1,650.

22. Plaintiff also provided HR mentorship and support to Defendants' unionized workforce of over a hundred employees. Additionally, Mrs. Saenz served as a resource to the local HR Manager in Antigua, providing guidance on human resources information system selection and implementation, policy development, and employee relations matters.

23. By the date of her termination, Mrs. Saenz was providing comprehensive HR leadership and operational support to over 2,000 people and her base salary was $210,000.

24. Throughout her tenure, Mrs. Saenz consistently demonstrated her professionalism, and dedication to MEA/AUA, even in the face of egregious discrimination, harassment, and retaliation.

25. Mrs. Saenz' exceptional leadership abilities were not only recognized through her promotions and salary increases; they were also recognized by the fact that she only ever received positive reviews prior to engaging in protected activity and was asked to join the Company's President's Council, a leadership group comprising senior executives, beginning June 2024.

II. Defendants Perpetuate A Pattern Of Sex And Race-Based Discrimination Against Mrs. Saenz.

26. Notably, Mrs. Saenz was the only female among eight members of the Company's President's Council, which included Defendant Dr. Peter Bell, President (white male), Defendant Sheikh Sadiq, Consultant (Indian male), Prabhakaran (Prabhu) Marudheri,

Chief Financial Officer ("CFO") (Indian male), Craig Hauser, Senior Vice President of Academic Administration (white male), Defendant Same Yospe, Vice President & General Counsel (white male) Vernon Solomon, Chief Operating Officer ("COO") (black male), and Dr. David T. Graham, Provost/Executive Dean (white male).

27. Additionally, Mrs. Saenz was the lowest-paid member of the President's Council, earning an annual base salary of $210,000 plus a potential annual bonus of $35,000.

28. Upon information and belief, for many years, Mrs. Saenz' base pay and bonus was less than her male counterparts, including the men who comprised the remainder of the senior members of the organization.

29. Despite having risen to the leadership ranks of MEA/AUA, Mrs. Saenz experienced discrimination, harassment, and disparate treatment based on her sex and race, conduct which was never ameliorated even after Mrs. Saenz made repeated complaints to leadership.

30. For example, MEA/AUA refused Mrs. Saenz the same professional development opportunities afforded to other members of the President's Council; MEA/AUA often paid for other President's Council members' work-related travel, while rejecting Mrs. Saenz' requests to the attend those same conferences and meetings under the recurring pretext of the Company's "financial hardship."

31. MEA/AUA even paid for Defendant Bell's wife, who is not employed by MEA/AUA, to fly business class with him on work trips.

32. In one instance, in January 2025, Defendant Yospe went to a Commission for Independent Education conference in Florida, with all expenses covered by MEA. That same month, Defendant Bell, Defendant Sadiq, and Mr. Hauser travelled to Antigua for new student

registration and faculty insurance renewals.

33. Defendant Bell told Mrs. Saenz that she could not go for "business reasons" including the company's current state of financial distress even though student health insurance and faculty health insurance renewals—which she handled—would be major topics of discussion.

34. This disparate treatment is further underscored by budgetary decisions disclosed during a February 2025 budget meeting, at which time HR learned that approximately $30,000 had been allocated for Defendant Bell's professional development and training. This allocation occurred while Defendants also claimed the Company was experiencing financial distress severe enough to necessitate elimination of Mrs. Saenz' role.

35. Additionally, at the same time, Defendant Bell continued to receive a $3,000 monthly housing allowance for his residence in West Palm Beach, Florida, and continued to incur substantial travel expenses during a period when Company-wide travel restrictions were purportedly in effect.

36. Finally, in April 2025—shortly after Mrs. Saenz' termination—Respondent implemented approximately 4% company-wide performance increases for employees and executives.

37. Mrs. Saenz was also routinely undermined and her contributions dismissed by members of the Leadership Council, particularly by Individual Defendants and Defendant Sadiq.

38. In Leadership Council meetings, Defendant Bell would frequently cut Mrs. Saenz off when she attempted to speak about her department's matters, giving preference to male colleagues.

39. And when Mrs. Saenz would make suggestions, they would be ignored, only to

be praised when later repeated by male colleagues.

40. Additionally, Defendant Yospe exhibited a consistent pattern of overreaching into matters that fell squarely within the domain of HR, from which he would also exclude Mrs. Saenz.

41. For example, Defendant Yospe had frequent and well-documented private discussions with Defendant Bell regarding employee leave policies, benefits administration, and other core HR functions without Mrs. Saenz' knowledge or involvement.

42. Individual Defendants' actions not only undermined Mrs. Saenz' authority, they reflected a persistent disregard for established organizational roles and processes.

43. In October 2024, Defendants' mistreatment intensified after Mrs. Saenz engaged in protected activity by complaining about a racially biased statement MEA'AUA's Head of Admissions Consultant Arjun Mohan made following an exit interview Mrs. Saenz conducted with Admissions employee, Karen Ash, a Black female employee who resigned from employment at the Company after reporting a hostile work environment under Mr. Mohan's leadership.

44. During a subsequent phone call with Mr. Mohan to discuss Ms. Ash's concerns, Mr. Mohan became hostile, accused Ms. Ash of lying, and yelled at Mrs. Saenz: *"You people don't know what you're talking about and don't know how to do your jobs."* Mrs. Saenz understood his reference to "you people" to be a reference to the fact that both she and Ms. Ash are Black women.

45. When Mrs. Saenz reported this incident, and its racist and sexist implications, to Defendant Bell, Defendant Bell primarily disregarded her concerns. While he invited Mr. Mohan to a President's Council meeting, in which Mr. Mohan offered the inadequate response: "I'm

sorry that you got offended," Defendant Bell did not make any additional attempts to effectively remedy Mr. Mohan's misconduct or prevent it from recurring, and in a subsequent conversation, Defendant Bell dismissively directed Mrs. Saenz to "move on."

46. Between October and December 2024, Mrs. Saenz engaged in further protected activity by expressing her concerns to all other Council members Hauser, Solomon, Marudheri, Defendant Sadiq, Defendant Yospe, Defendant Bell; as well as former President and CEO Neal Simon and former General Counsel Leonard Sclafani; that Defendant Bell treated her differently as the only female in the Council and one of only two Black members of the Council.

47. However, in shocking disregard for the confidential nature of her protected complaint, rather than addressing Mrs. Saenz' concerns, Defendant Sadiq reported Mrs. Saenz' comments back to Defendant Bell; Defendant Bell then required Mr. Hauser to verify whether Mrs. Saenz had complained about him. Once again, Defendants ignored Mrs. Saenz' concerns.

III. Mrs. Saenz Is Retaliated Against For Engaging In Whistleblower Activity.

48. The Company's misconduct intensified further when Mrs. Saenz' complaints extended beyond the race- and gender-based discrimination and harassment she was experiencing to address her reasonable belief that the Company was engaging in numerous compliance violations.

49. For example, in January 2025, Defendant Bell bypassed the HR processes Mrs. Saenz oversaw to promote then-IT consultant Defendant Sadiq to the newly-created position of Senior VP of Strategy and Operations.[1] MEA/AUA circulated no internal or external postings for this position, engaged in no formal application process, and gave no opportunities for qualified executives—including Mrs. Saenz—to apply or be considered.

[1] Defendant Bell previously offered this position only to Mr. Hauser, further highlighting his pattern of preferential advancement for male leaders.

50. Defendant Bell's violations of equal opportunity laws were especially concerning to Mrs. Saenz given her role as head of HR and her responsibility to uphold equitable hiring and promotion standards.

51. Additionally, during a President's Council meeting on January 28, 2025, Mrs. Saenz raised concerns that two other members of the President's Council previously raised to her about Defendant Sadiq's misclassification in remaining a consultant in his new role rather than changing status to an employee.

52. Based on her extensive knowledge and experience in HR compliance matters and her understanding that Defendant Sadiq was performing duties consistent with that of a senior executive employee, Mrs. Saenz reasonably believed that the misclassification of Defendant Sadiq's employment status violated federal and state tax laws, including Internal Revenue Code ("IRS") provisions regarding employee versus independent contractor classification such as IRC Section 3509, as well as New York State labor laws regarding proper worker classification such as the Fair Labor Standards Act.

53. In response, during this same meeting, Defendant Bell became visibly angry, accused Mrs. Saenz of undermining Defendant Sadiq's leadership, and rebutted that having Defendant Sadiq continue to be classified as a contractor was saving the Company money.

54. In response, when Mrs. Saenz attempted to raise concerns that HR processes were bypassed to promote Defendant Sadiq, Defendant Bell again reacted with hostility, repeatedly interrupting Mrs. Saenz and undermining her authority by insisting "the matter is settled!"

55. After two male colleagues, Mr. Hauser and Mr. Solomon, spoke up in support of Mrs. Saenz during this meeting, Defendant Bell later apologized only to Mr. Hauser, ignoring both Mr. Solomon (who is Black) and Mrs. Saenz—suggesting a pattern of both gender and

racial discrimination.

56. Defendants' pattern of mistreatment had become so obvious that other male executives, including Mr. Hauser and Mr. Solomon, explicitly acknowledged to Mrs. Saenz that Defendant Bell was ignoring and ostracizing her because of her gender, including during an hour-and-a-half conference call together to debrief after the explosive President's Council meeting on January 28, 2025.

57. Despite his lack of qualifications or relevant experience in managing HR at the executive level, Defendant Sadiq's new role, the second highest within the organization, now placed him in a position of authority over critical departments, including Human Resources.

58. Mrs. Saenz was the only member of the Presidential Council whose reporting structure was altered as a result; she now had to report to Defendant Sadiq instead of Defendant Bell, which effectively constituted a demotion, as this new reporting structure removed her from the President's Council and reclassified her out of senior leadership. Mrs. Saenz was ultimately terminated before this change took effect.

59. In January 2025, Mrs. Saenz complained to Mr. Hauser that she was being prevented from performing essential HR functions, was being treated differently than her male colleagues, and that Defendant Bell continued to ignore her concerns.

60. Mrs. Saenz also engaged in protected whistleblower activity when she raised Health Insurance Portability and Accountability Act ("HIPAA") compliance concerns regarding Defendant Sadiq's participation in insurance-related meetings and discussions in February 2025.

61. Specifically, on February 18, 2025, Mrs. Saenz explained at the President's Council meeting that Defendant Sadiq had insisted that he be included in all discussions with the Company's insurance carrier however since he had not received required HIPAA training,

and would have access to sensitive personal health information and protected health information ("PHI") of employees, it would be a violation of HIPAA's privacy and security rules for him to participate.

62. Despite this explanation, Defendant Sadiq insisted on full participation and reiterated his demand in a follow-up email shortly following this February 18, 2025 meeting.

63. In response, Mrs. Saenz consulted with Defendant Bell to express her reasonable HIPAA-related concerns given the sensitive nature of employees' personal health data shared in these conversations.

64. Defendant Bell refused to assist in this matter and simply instructed Mrs. Saenz to email Defendant Sadiq directly to clarify the appropriate timing of Defendant Sadiq's involvement; which led to a series of increasingly hostile emails from Defendant Sadiq.

65. While Defendant Bell eventually intervened and spoke with Defendant Sadiq privately about the issue, this did not prevent Defendant Sadiq's hostility towards Plaintiff from escalating.

66. Defendant Bell's documented pattern of publicly challenging and undermining Mrs. Saenz, while resolving disagreement and potential conflict with male colleagues collaboratively and privately—including Defendant Sadiq—further illustrates a pattern of gender-based discrimination against Mrs. Saenz.

67. Following this incident, Defendant Sadiq's undermining and retaliatory behavior escalated, and Mrs. Saenz was once again compelled to engage in protected whistleblower activity.

68. On February 21, 2025, Mrs. Saenz received an email from Defendant Sadiq instructing Mrs. Saenz to immediately hire a candidate he personally identified for a newly

created Financial Aid position without following standard HR protocols. He further stated that he had already identified a candidate for the role and proposed both a title and salary range.

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

70. In response, Mrs. Saenz objected on the grounds that Mr. Sadiq's hiring decision violated equal employment opportunity laws and fair hiring practices and reminded Defendant Sadiq that the Company's HR protocols exist not only to support the Company's commitment to being an equal opportunity employer, but to ensure its compliance with federal, state, and local anti-discrimination laws.

71. Despite this, Defendant Sadiq instructed Mrs. Saenz to immediately begin the onboarding process without delay.

72. He continued to pressure Mrs. Saenz to expedite the hiring process, and when she reiterated the importance of adhering to fair and transparent hiring practices, Defendant Sadiq accused her of acting against the Company's best interests and sent a series of hostile and increasingly antagonistic emails about the issue to Mrs. Saenz, cc'ing other Company decision-makers, including Defendant Bell.

73. Rather than address Mrs. Saenz' reasonable compliance and equity concerns, Defendant Bell replied all, copying Global HR Head and Chief HR Officer at Manipal Group, Mr. Nishith Mohanty, and expressed his support for Defendant Sadiq's position.

74. This incident is yet another example of the Company's persistent pattern of deliberately excluding Mrs. Saenz from key HR decisions, undermining her professional judgment, and retaliating against her in response to her attempts to enforce lawful and ethical

practices.

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

76. Additionally, Mrs. Saenz' whistleblower activities were known to Defendants Bell, Yospe, and Sadiq, as well as other members of senior leadership, since she raised these concerns directly with them in meetings, email correspondence, and through HR channels to provide the Company reasonable opportunities to correct such violations.

IV. Defendants' Retaliatory Campaign Culminates In Mrs. Saenz' Unlawful Termination And Interference With Her FMLA Rights.

77. On February 21, 2025, Mrs. Saenz began drafting a formal complaint to Mr. Mohanty against Defendants Bell and Sadiq. In this complaint, she highlighted the following concerns: Defendants Bell and Sadiq's exclusion of her from HR-related conversations; their pressure to make Mrs. Saenz bypass internal hiring policies; as well as their discrimination and disparate treatment based on gender and racial animus.

78. On February 24, 2025, Mrs. Saenz informed Mr. Hauser that she needed to take protected FMLA leave to take her son to a medical specialist and otherwise provide care for him because he had become severely ill with high fevers and inexplicable seizures.

79. That same day (February 24, 2025), Mrs. Saenz' draft complaint was accessed by someone else on the Company's system, as indicated by MEA/AUA's system logs.

80. Two days later, on February 26, 2025, Mrs. Saenz realized she was unable to log into her work account from home.

81. Hours later, Mrs. Saenz was abruptly terminated via Zoom meeting by Defendant

Sadiq who claimed that she was being let go because the Company was "restructuring" and eliminating the in-house HR function to bring on a third-party HR administrator.

82. At the time of her termination, Defendants were well aware that Mrs. Saenz' five-year-old son was undergoing crucial medical testing to determine whether he had epilepsy.

83. Adding further insult to injury, after twelve years with the Company, Defendants only offered Mrs. Saenz three months of severance pay, healthcare coverage for just *two* more days, and payment only for accrued vacation days from January 1, 2025 through February 26, 2025.

84. This package was inconsistent with the Company's past practices for senior executives. Historically, vice president level executives and senior leadership (most of whom were male) received a minimum of six months' severance pay, six or more months of company-sponsored COBRA coverage, and a full payout of paid time off ("PTO") for the year—both accrued and unaccrued.

85. The timing of Mrs. Saenz' termination not only establish that it was unlawful but also particularly callous given that Mrs. Saenz was in the midst of a family medical crisis involving her young child who was facing a serious neurological condition requiring urgent medical care.

FIRST CAUSE OF ACTON
RACE/GENDER DISCRIMINATION IN VIOLATION OF TITLE VII
Against MEA/AUA

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

138. By the actions detailed above, among others, Defendant MEA/AUA discriminated against Plaintiff in violation of Title VII by denying her the equal terms and

conditions of her employment based on her gender/sex and race, and by allowing Plaintiff to be subjected to discrimination, sexual harassment, and a hostile work environment.

139. Because of MEA/AUA's 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 his 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.

140. Accordingly, as a result of Defendant MEA/AUA's unlawful conduct set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law.

SECOND CAUSE OF ACTON
RETALIATION IN VIOLATION OF TITLE VII
Against MEA/AUA

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

142. By the actions detailed above, among others, Defendant MEA/AUA, retaliated against Plaintiff for engaging in protected activities pursuant to Title VII, including by altering the terms and conditions of Plaintiff's employment, and ultimately unlawfully terminating her.

143. Because of MEA/AUA's 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.

144. Accordingly, as a result of Defendant MEA/AUA's unlawful conduct set forth herein, Plaintiff has been damaged and is entitled to the maximum compensation available to her under this law.

THIRD CAUSE OF ACTION
RETALIATION IN VIOLATION OF THE FMLA
Against All Defendants

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

146. By the actions described above, among others, Defendants engaged in unlawful employment practices prohibited by the FMLA by retaliating against Plaintiff after she exercised her rights under the FMLA, including by unlawfully terminating Plaintiff just two days after she requested protected FLMA leave.

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

148. 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, liquidated damages.

FOURTH CAUSE OF ACTION
INTERFERENCE IN VIOLATION OF THE FMLA
Against All Defendants

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

150. By the actions described above, among others, Defendants interfered with and

discriminated against Plaintiff for exercising her FMLA rights by altering the terms and conditions of her employment, including by unlawfully terminating Plaintiff just two days after she requested protected FLMA leave.

151. As a direct and proximate result of the Defendants' unlawful conduct in violation of the FMLA, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, for which she is entitled to an award of damages, to the greatest extent permitted under law, in addition to reasonable attorneys' fees and expenses.

152. Defendants knew or showed reckless disregard for the fact that their conduct violated Plaintiff's rights under the FMLA.

FIFTH CAUSE OF ACTION
RETALIATION IN VIOLATION OF NEW YORK LABOR LAW § 740
Against MEA/AUA

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

159. New York Labor Law § 740(2) provides that:

"An employer shall not take any retaliatory action against an employee, whether or not within the scope of the employee's job duties, because such employee does any of the following:

(a) discloses […] to a supervisor or to a public body an activity, policy or practice of the employer that the employee reasonably believes is in violation of law, rule or regulation …; [or]

(c) objects to or refuses to participate in any such activity, policy or practice."

160. Plaintiff is an "employee" within the meaning of NYLL § 740(1)(a).

161. Defendant is an "employer" within the meaning of NYLL § 740(1)(b).

162. 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 lost income, salary, benefits, bonuses, commission and other compensation that his employment entailed, and other non-pecuniary losses and special damages.

163. Accordingly, as a result of Defendant MEA/AUA's unlawful conduct, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available under this law.

SIXTH CAUSE OF ACTION
DISCRIMINATION AND HOSTILE WORK ENVIRONMENT IN VIOLATION OF THE NYSHRL
Against All Defendants

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

154. New York Executive Law § 296 provides that:

> It shall be an unlawful discriminatory practice . . . [f]or 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.

155. Defendants discriminated against Plaintiff in violation of the NYSHRL by denying her the equal terms and conditions of her employment based on race and gender, and by allowing Plaintiff to be subjected to discrimination, sexual harassment, and a hostile work environment.

156. 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.

157. Accordingly, as a result of Defendants' unlawful conduct, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available to her under this law.

SEVENTH CAUSE OF ACTION
RETALIATION IN VIOLATION OF THE NYSHRL
Against All Defendants

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

159. New York Executive Law § 296 provides that:

> 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.

160. By the actions detailed above, among others, Defendants retaliated against Plaintiff based on her protected activities in violation of the NYSHRL, including by terminating Plaintiff's employment.

161. 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 his 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.

162. Accordingly, as a result of Defendants' unlawful conduct, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available to her under

this law.

EIGHTH CAUSE OF ACTION
AIDING AND ABETTING IN VIOLATION OF THE NYSHRL
Against Individual Defendants Only

163. Plaintiff hereby repeats, reiterates, and re-alleges each and every previous allegation as if fully set forth herein.

164. 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."

165. As alleged herein, the Individual Defendants engaged in an unlawful employment practice in violation of New York State Executive Law § 296(6) by aiding, abetting, inciting, compelling, or coercing the discriminatory conduct against Plaintiff.

166. 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 his 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.

167. Accordingly, as a result of the unlawful conduct of the Individual Defendants, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available under this law.

NINTH CAUSE OF ACTION
DISCRIMINATION AND HOSTILE WORK ENVIRONMENT IN VIOLATION OF THE NYCHRL
Against All Defendants

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

169. New York City Administrative Code §8-107(1) provides that it shall be an unlawful discriminatory practice:

> 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.

170. Defendants discriminated against Plaintiff in violation of the NYCHRL by denying her the equal terms and conditions of her employment based on race and gender, and by allowing Plaintiff to be subjected to discrimination, sexual harassment, and a hostile work environment.

171. 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.

172. Accordingly, as a result of Defendants' unlawful conduct, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available to her under this law.

TENTH CAUSE OF ACTION
RETALIATION IN VIOLATION OF THE NYCHRL
Against All Defendants

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

174. New York City Administrative Code §8-107(7) provides that:

> it shall be unlawful discriminatory practice for any person engaged in any activity to which this chapter applies to retaliate or discriminate in any manner against any person because such person has (i) opposed any practice forbidden under this chapter, (ii) filed a complaint, testified or assisted in any proceeding under this chapter, (iii) commenced a civil action alleging the commission of an act which would be an unlawful discriminatory practice under this chapter, (iv) assisted the commission or the corporation counsel in an investigation commenced pursuant to this title, (v) requested a reasonable accommodation under this chapter, or (vi) provided any information to the commission pursuant to the terms of a conciliation agreement made pursuant to section 8-115 of this chapter.

175. By the actions detailed above, among others, Defendants retaliated against Plaintiff based on her protected activities in violation of the NYCHRL, including by terminating Plaintiff's employment.

176. 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 his 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.

177. Accordingly, as a result of Defendants' unlawful conduct, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available to her under

this law.

ELEVENTH CAUSE OF ACTION
AIDING AND ABETTING IN VIOLATION OF THE NYCHRL
Against Individual Defendants Only

178. Plaintiff hereby repeats, reiterates, and re-alleges each and every previous allegation as if fully set forth herein.

179. 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 acts of the acts forbidden under this chapter, or attempt to do so."

180. As alleged herein, the Individual Defendants engaged in an unlawful employment practice in violation of New York City Administrative Code §8-107(6) by aiding, abetting, inciting, compelling, or coercing the discriminatory conduct against Plaintiff.

137. 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 his 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.

138. Accordingly, as a result of the unlawful conduct of the Individual Defendants, Plaintiff has been damaged as set forth herein and is entitled to the maximum compensation available under this law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests a judgement against Defendants:

A. Declaring Defendants engaged in unlawful employment practices prohibited by Title

VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166 ("Title VII"); the Family and Medical Leave Act, 29 U.S.C. § 2601 *et seq*. ("FMLA"); New York Labor Law § 740 ("NYLL § 740"); the New York State Human Rights Law, New York State Executive Law, § 296 *et seq.* ("NYSHRL"); and the New York City Human Rights Law, N.Y.C. Admin. Code § 8-107, *et seq*. ("NYCHRL").

B. Awarding damages to Plaintiff for all lost wages and benefits resulting from Defendant's unlawful employment practices, and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices;

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 liquidated damages;

F. Awarding Plaintiff attorneys' fees, costs, and expenses incurred in the prosecution of the action; and

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

JURY DEMAND

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

Dated: September 18, 2026
New York, New York

Respectfully submitted,

FILIPPATOS PLLC

By: _____

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