

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SHONDA FERNANDEZ,

Plaintiff,

-v-

WENIG SALTIEL LLP, IRA GREENE, JEFFREY L.
SALTIEL, and MERYL L. WENIG,

Defendants.
-----X

Case Number:

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff, SHONDA FERNANDEZ (“Ms. Fernandez” or the “Plaintiff”) by and through his attorneys, THE LAW OFFICES OF WILLIAM CAFARO, as and for her Complaint against WENIG SALTIEL LLP (the “Firm” or “Wenig Saltiel LLP”), IRA GREENE (“Mr. Greene”), JEFFREY L. SALTIEL (“Mr. Saltiel”), and MERYL L. WENIG (“Ms. Wenig”) (all together as “Defendants”), alleges upon knowledge to herself and her own actions and upon information and belief as to all other matters as follows:

NATURE OF CASE

1. This action is brought pursuant to the Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. Section 1981 (“Section 1981”), the New York State Human Rights Law, New York Exec. Law § 290 et seq. (“NYSHRL”), and New York City Human Rights Law, Title 8 of the Administrative Code of the City of New York, as amended, including The Local Civil Rights Restoration Act, effective October 3, 2005, as well as Local Laws 1, 34, 35, 36, 37, 38, and 40 of 2016 (“NYCHRL”) and other appropriate rules, regulations, statutes, and ordinances.

2. Plaintiff (an African American female of Hispanic descent) claims that Defendants - a real estate law firm, its partners, and Of Counsel who are jointly involved in egregious unlawful conduct - subjected her to a despicable and actionable hostile work

environment on the basis of her race, retaliated against her for opposing discriminatory practices, and terminated her employment because of her race and/or in retaliation for engaging in protected activity.

JURISDICTION AND VENUE

3. Jurisdiction is based upon 28 U.S.C. §§ 1331 and 1343, insofar as it involves a statute of the United States, specifically, Section 1981. Plaintiff relies upon 28 U.S.C. § 1367 to invoke supplemental jurisdiction with respect to the New York causes of action, including Plaintiff's NYSHRL and NYCHRL claims, which form other bases for recovery upon the same factual nexus.

5. Venue is appropriate in this Court pursuant to 28 U.S.C. § 1391(b)(2), as all actions comprising the claims for relief occurred within this judicial district.

ADMINISTRATIVE PROCEDURES

4. Within a week of filing this complaint, Ms. Fernandez shall file a charge of discrimination with the U.S. Equal Employment Opportunity Commission ("EEOC") against Defendants for violations of Title VII of the Civil Rights Act of 1964, as amended ("Title VII"). The allegations, which will be contained in Plaintiff's EEOC charge, will arise out of many (if not all) of the same facts alleged herein that pertain to his Section 1981, NYSHRL, and NYCHRL discrimination claims.

5. Immediately upon receiving the notice of right to sue from the EEOC and/or permission from the EEOC to remove the claims and bring them to Court, Plaintiff will promptly amend the complaint to include all federal claims contained in her EEOC charge.

PARTIES

6. Plaintiff is a resident of the State of New Jersey.

7. At all times herein pertinent, Plaintiff was an “employee” and “person” within the meaning of Section 1981, NYSHRL, and NYCHRL.

8. At all times herein pertinent, Wenig Saltiel LLP was and is a domestic registered limited liability partnership authorized to do business in the state of New York with a principal place of business located at 26 Court Street, Suite 1200, Brooklyn, New York 11242.

9. At all times herein pertinent, Mr. Greene was a resident of the State of New York and has a principal place of business located at 26 Court Street, Suite 1200, Brooklyn, New York 11242.

10. At all times herein pertinent, Mr. Saltiel was a resident of the State of New York and has a principal place of business located at 26 Court Street, Suite 1200, Brooklyn, New York 11242.

11. At all times herein pertinent, Ms. Wenig was a resident of the State of New York and has a principal place of business located at 26 Court Street, Suite 1200, Brooklyn, New York 11242.

12. At all times herein pertinent, Defendants were employers under Section 1981 and NYSHRL and had 15 or more persons in their employ at all times relevant to this action.

BACKGROUND FACTS

13. In its blog, Wenig Saltiel LLP boasts about having over 20 years of experience representing clients in real estate and landlord/tenant matters and being the “Go-to Firm for Results.” It conveniently excludes that various former employees, particularly racial minorities, have routinely complained about their outrageous and unlawful conduct.

14. Mr. Greene is Wenig Saltiel LLP’s former owner and partner.

15. Following a hostile takeover of the business, Mr. Greene was stripped of his title and demoted to “Of Counsel.” In this capacity, he answered (and continues to answer) exclusively to Mr. Saltiel and/or Ms. Wenig.

16. At all times relevant to this case, Mr. Greene was one of Plaintiff’s supervisors and had authority over all aspects of her employment.

17. Upon information and belief, Mr. Saltiel is the Firm’s managing partner who along with Ms. Wenig has unbridled authority and final say in all matters concerning the Firm, including but not limited to human resources matters, hiring and firing practices, promotions and compensation for employees, and the day-to-day activities at the Company.

18. Upon information and belief, Ms. Wenig is a partner of the Firm who along with Mr. Saltiel has unbridled authority and final say in all matters concerning the Firm, including but not limited to human resources matters, hiring and firing practices, promotions and compensation for employees, and the day-to-day activities at the Company.

19. Plaintiff worked for the Company as an officer manager from August 2018 through on or about February 27, 2019, during which time she faithfully and competently did her job.

20. Throughout her entire employment, Defendants showed contempt and bigotry towards Plaintiff for her race, creating a toxic work environment and stifling her professional development.

21. From August 2018 and continuing through Plaintiff’s entire employment, Mr. Greene regularly barged into her office to make racist and bigoted remarks, such as “Blacks, Middle Easterners, and Hispanics are taking over this once great country” and “Blacks are not smart.” Mr. Greene also made bigoted remarks about African American employees at the Firm,

angrily exclaiming “Blacks cannot think for themselves. They can only do what you tell them to do!” Mr. Greene even stated that he has relatives in the south, who sit on porches with shotguns “like the good old days.”

22. Plaintiff repeatedly reported Mr. Greene’s remarks to Mr. Saltiel, who dismissed her saying, “That’s Ira for you!”; “That’s just what he does.”; and “Just wait until he really gets comfortable with you.” Unsurprisingly, Mr. Greene’s behavior not only continued, it became exponentially worse.

23. Indeed, from August 2018 and continuing virtually on a daily basis throughout Plaintiff’s entire employment, Mr. Greene watched videos of African American women and children being hung from trees and set on fire and African American women in particular being raped and killed, all from his office computer and within earshot of the rest of the staff. He also routinely and loudly played confederate anthems and marches.

24. Flabbergasted at these vile and threatening videos, Plaintiff immediately and consistently asked Mr. Greene to stop playing them. Rather than comply, he doubled down stating that the videos were from a website belonging to a white supremacy group in which he is an active member, further adding to Plaintiff’s fear and anxiety at work.

25. Throughout her employment - from August 2018 through February 2019 - Plaintiff consistently complained to Mr. Saltiel about the videos Mr. Greene watched and even requested that his internet usage be blocked or, at minimum, restricted.

26. In response to these many complaints, Mr. Saltiel laughed asking “Was it anything good?” and warning “Just wait until he starts playing the slave march!” When Plaintiff asked Mr. Saltiel about the slave march, he explained: “Ira [Greene] sits in his office and blasts the slave march from his computer. Prior employees have complained, but Meryl [Wenig]

doesn't want to do anything about it." Mr. Saltiel's responses left painfully clear that the Firm endorsed Mr. Greene's behavior and that he was untouchable.

27. In or about the third week of October 2018, while talking to Plaintiff, Mr. Saltiel made derogatory comments about the Firm's African American receptionist: "You can take the girl out of the ghetto, but you can't take the ghetto out of the girl."

28. On or about October 22, 2018, the Firm held a sexual harassment training class (run by Plaintiff) with all staff members present. During the training, Mr. Greene defiantly expressed his displeasure with discrimination laws as a whole: "It's okay to pat your secretary on the ass and rub her shoulders. These discrimination laws today are too extreme. Back in my day you could say and do whatever you wanted, and no one complained. This is just ridiculous!" Mr. Saltiel, who was also present, laughed and did not address Mr. Greene's statements.

29. In or about the first week of November 2018, Mr. Greene repeatedly told Plaintiff "You're one of the smart ones." Understanding the racial undertone in his remark, Plaintiff asked Mr. Greene to clarify what he meant. He replied "You know, you're different from the rest of the blacks. You are classy, business minded. You know, uppity." When Plaintiff complained to Mr. Saltiel about these remarks, he answered, "I guess you're uppity" and did nothing at all.

30. On or about December 5, 2019, Mr. Greene went on a tirade against immigrants and African Americans in the legal profession. Among other things, he claimed the following:

- "Black attorneys aren't as smart as white attorneys."
- "Black, Indian and Hispanic attorneys come into this country and practice all types of laws, and they don't know what they are doing. They run all kinds of rackets."
- "Blacks become attorneys because of quotas. They don't have a head for enterprise."

31. Deeply offended by Mr. Greene's racist insults, Plaintiff responded that he was wrong about his characterization of minorities in the legal profession. To illustrate her point, she informed him that her daughter is a hard worker who graduated from Harvard Law School and is a successful corporate attorney. She even reminded him that there are several distinguished African Americans in the legal profession, including a well-respected female African American judge in Surrogates Court, Kings County who Defendants regularly appear before.

32. As to Plaintiff's daughter, Mr. Greene replied, "I don't believe it. Most of the black judges, doctors, and business people have done favors or slept with someone to get to where they are, and many of them probably had a Jew backing them." As to the aforementioned judge,¹ Mr. Greene claimed that she had slept her way onto the bench while simultaneously making crude hand gestures, implying that the judge had engaged in degrading forms of fellatio.

33. Plaintiff immediately went to Mr. Saltiel's office to complain about Mr. Greene's new remarks, stressing "I can't take this anymore. This has to stop now." But once more, Mr. Saltiel laughed and said, "That's just who he is."

34. Later that day, Mr. Greene continued his racist tirade, but this time unleashed it on another African American employee at the firm, who is a licensed attorney outside of New York, but was working as a paralegal at the time. Specifically, Mr. Greene reiterated his hateful claims about minorities allegedly not being smart and taking over the country, and even said that the United States needed to "bring back the confederacy."

35. This African American paralegal immediately complained to Plaintiff about Mr. Greene's remarks. Plaintiff promptly relayed the complaint to Mr. Saltiel. Undeniably concerned about the ramifications of ignoring the complaints of this paralegal, who has a law license in another state, Mr. Saltiel advised Plaintiff that he would speak to Ms. Wenig.

¹ Out of respect for the judiciary, we have decided to not identify the judge at this initial pleading stage.

36. On or about December 10, 2018, the Firm held a partners' meeting with Mr. Saltiel, Ms. Wenig, Nicholas Moccia (junior partner), Mr. Greene and Plaintiff to address Mr. Greene's behavior. When Ms. Wenig and Mr. Saltiel asked Mr. Greene about the accusations lodged against him by Plaintiff and the paralegal, he admitted everything, but in the same breath menacingly said to Plaintiff: "It turns out you were one of them after all." In a transparent attempt to do damage control, Mr. Wenig said "Now Ira, we must be careful with what we say. Not everyone will agree with our opinions." Emboldened by her and the Firm's lack of condemnation, Mr. Greene then began ranting about minorities taking over the country and his gripes with them in the legal field.

37. Upon hearing Mr. Greene's unapologetic remarks, Plaintiff and Mr. Moccia advised Mr. Saltiel and Ms. Wenig that they found Mr. Greene's behavior to be reprehensible and proposed that he be removed from the Firm or at least stripped of all authority. Mr. Saltiel and Ms. Wenig refused to take any corrective action against him, stating that he was "family."

38. On or about December 12, 2018, Plaintiff found an apology letter from Mr. Greene on her desk which stated:

After yesterday' meeting, I had to come to terms that I had said something hurtful to you. Upon reflection, I now understand why you had felt offended. Rather than make excuses at the time, which I did, I should have apologized instantly when it happened. There is no excuse for hurtful language that demeans people of foreign origin who now live here. Demeaning statements about any group of professionals based on race or ethnic origin are always wrong and clearly inappropriate. I accept that I made a mistake and I blame no one other than myself for having done so. At my age, I should be setting good examples in behavior, not bad ones. Therefore, I sincerely apologize to you for my error and will do my best never again to make statements that about others that are clearly out of line, derogatory and complete inappropriate.

39. Later that day, the African American paralegal informed Plaintiff that he had received a virtually identical apology letter from Mr. Greene. When Plaintiff informed Mr.

Saltiel about the apology letters, he reminded her that nothing would change: “By this afternoon, he will have committed a new set of offenses against you. That’s who he is. He never stops.”

40. Immediately after the issuance of the apology letters and in direct retaliation for Plaintiff complaining about Mr. Greene, she became a direct target of Ms. Wenig. Indeed, Ms. Wenig essentially demoted her from office manager to paralegal/assistant and forced her to assume vital responsibilities for over 30 cases, with which Plaintiff was not familiar. Making matters worse, Ms. Wenig sternly warned Plaintiff that she would be held accountable for all mistakes made in these 30 plus cases, even if the mistakes were made by the assigned attorneys.

41. From in or about January 2019 through the end of her employment, Plaintiff’s duties increased and, as warned, she was constantly (and unfairly) blamed for mistakes made by the Firm’s attorneys. Also, Ms. Wenig regularly yelled at Plaintiff in front of other employees for trivial matters, strongly chided her for allegedly making mistakes on cases for which she was not responsible, and frivolously accused her of other infractions in email chains with the staff.

42. Following the example set by Defendants, Plaintiff’s subordinates (i.e., paralegals and support staff) regularly ignored her directives and disrespected her at the office.

43. On or about January 17, 2019, Plaintiff complained to Mr. Saltiel about Ms. Wenig’s retaliatory behavior towards her. Confirming what was already self-evident, Mr. Saltiel warned Plaintiff that “Meryl is on a warpath for you, she has it in for you, just stay away from her.” However, he did nothing to address her claims, presumably because he believed (incorrectly, of course) that she would never initiate legal action against Defendants.

44. Despite Mr. Greene’s feigned apology letters, on or around February 6, 2019, he told Plaintiff that black students marching on the streets for Black History Month “need to go back to school” and “stop marching for this nonsense.” A few days later, Mr. Greene reverted to

complaining about racial minorities in this country and in the legal profession. As always, the Firm fully endorsed his behavior by doing nothing to stop it.

45. Adding insult to injury, during the remaining days of February 2019, Defendants collectively mistreated and disrespected Plaintiff at every turn.

46. Finally, after several months of despicable racial discrimination and in response to her lodging countless complaints against the Firm, on February 27, 2019, Mr. Saltiel unceremoniously terminated Plaintiff by telephone.

47. Rather than extend Plaintiff's health insurance coverage by 30 days - as the Firm does for all former employees - Defendants canceled it two days later. Further showing their punitive nature, Plaintiff did not receive a letter regarding COBRA coverage until a month later. These small, but significant, actions were clearly retaliatory and greatly prejudiced Plaintiff.

48. Defendants treated Plaintiff unequally, and less well than other employees because of her race, in violation of Section 1981, NYSHRL, and NYCHRL.

49. Employees outside Plaintiff's protected classes were treated more favorably than Plaintiff.

50. Defendants' discriminatory conduct was both severe and pervasive, as they subjected Plaintiff to discriminatory acts on a recurring basis. This conduct was and is personally insulting, offensive and abusive to Plaintiff, and would be objectively insulting, offensive and abusive to others.

FIRST CLAIM FOR RELIEF AGAINST DEFENDANTS
Race Discrimination Under Section 1981

51. Plaintiff hereby incorporates all preceding paragraphs of this complaint with the same force and effect as if fully set forth at length.

52. Defendants discriminated against Plaintiff on the basis of her race (African American) in violation of Section 1981 by denying her the same terms and conditions available to non-African American employees, including but not limited to, subjecting her to disparate working conditions and denying her the opportunity to work in an employment setting free of unlawful discrimination and harassment.

53. Defendants discriminated against Plaintiff on the basis of her race, in violation of Section 1981, by creating, fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or to remedy a hostile work environment that included, among other things, harassment of Plaintiff because of her race.

54. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of Section 1981, Plaintiff has suffered and continues to suffer substantial losses, including the loss of past earnings, the loss of future earnings, and the loss of other employment benefits in an amount to be proved at trial.

55. As a direct and proximate result of Defendants' actions, Plaintiff suffered and continues to suffer severe and lasting embarrassment, humiliation, mental and physical anguish and other incidental consequential damages and expenses in an amount to be proved at trial.

56. Defendants have acted with malice or reckless indifference to Plaintiff.

57. Therefore, Plaintiff is entitled to all remedies and relief afforded by Section 1981, including but not limited to, back pay, front pay, emotional distress, punitive damages and attorney's fees and costs, as well as any and all injunctive relief.

SECOND CLAIM FOR RELIEF AGAINST DEFENDANTS
Retaliation Under Section 1981

58. Plaintiff hereby incorporates all preceding paragraphs of this complaint with the same force and effect as if fully set forth at length.

59. Defendants have and continue to retaliate against Plaintiff because she complained about the unlawful discrimination and harassment to which was subject, in violation of Section 1981.

60. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of Section 1981, Plaintiff has suffered and continues to suffer substantial losses, including the loss of past earnings, the loss of future earnings, and the loss of other employment benefits in an amount to be proved at trial.

61. As a direct and proximate result of Defendants' actions, Plaintiff suffered and continues to suffer severe and lasting embarrassment, humiliation, mental and physical anguish and other incidental consequential damages and expenses in an amount to be proved at trial.

62. Defendants have acted with malice or reckless indifference to the Plaintiff.

63. Therefore, Plaintiff is entitled to all remedies and relief afforded by Section 1981, including but not limited to, back pay, front pay, emotional distress, punitive damages and attorney's fees and costs, as well as any and all injunctive relief.

THIRD CLAIM FOR RELIEF AGAINST DEFENDANTS
Race Discrimination under the NYSHRL

64. Plaintiff hereby incorporates all preceding paragraphs of this complaint with the same force and effect as if fully set forth at length.

65. Defendants discriminated against Plaintiff on the basis of her race (African American) in violation of NYSHRL by denying her the same terms and conditions available to non-African American employees, including but not limited to, subjecting her to disparate working conditions and denying her the opportunity to work in an employment setting free of unlawful discrimination and harassment.

66. Defendants discriminated against Plaintiff on the basis of her race, in violation of NYSHRL, by creating, fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or to remedy a hostile work environment that included, among other things, harassment of Plaintiff because of her race.

67. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of Section NYSHRL, Plaintiff has suffered and continues to suffer substantial losses, including the loss of past earnings, the loss of future earnings, and the loss of other employment benefits in an amount to be proved at trial.

68. As a direct and proximate result of Defendants' actions, Plaintiff suffered and continues to suffer severe and lasting embarrassment, humiliation, mental and physical anguish and other incidental consequential damages and expenses in an amount to be proved at trial.

69. Defendants have acted with malice or reckless indifference to the Plaintiff.

70. Therefore, Plaintiff is entitled to all remedies and relief afforded by NYSHRL, including but not limited to, back pay, front pay, and emotional distress, as well as any and all injunctive relief.

FOURTH CLAIM FOR RELIEF AGAINST DEFENDANTS
Retaliation under the NYSHRL

71. Plaintiff hereby incorporates all preceding paragraphs of this complaint with the same force and effect as if fully set forth at length.

72. Defendants have and continue to retaliate against Plaintiff because she complained about the unlawful discrimination and harassment to which she was subject, in violation of NYSHRL.

73. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of NYSHRL, Plaintiff has suffered and continues to suffer substantial losses,

including the loss of past earnings, the loss of future earnings, and the loss of other employment benefits in an amount to be proved at trial.

74. As a direct and proximate result of Defendants' actions, Plaintiff suffered and continues to suffer severe and lasting embarrassment, humiliation, mental and physical anguish and other incidental consequential damages and expenses in an amount to be proved at trial.

75. Defendants have acted with malice or reckless indifference to the Plaintiff.

76. Therefore, Plaintiff is entitled to all remedies and relief afforded by NYSHRL, including but not limited to, back pay, front pay, and emotional distress, as well as any and all injunctive relief.

FIFTH CLAIM FOR RELIEF AGAINST DEFENDANTS
Race Discrimination under the NYCHRL

77. Plaintiff hereby incorporates all preceding paragraphs of this complaint with the same force and effect as if fully set forth at length.

78. Defendants discriminated against Plaintiff on the basis of her race (African American) in violation of NYCHRL by denying her the same terms and conditions available to non-African American employees, including but not limited to, subjecting her to disparate working conditions and denying her the opportunity to work in an employment setting free of unlawful discrimination and harassment.

79. Defendants discriminated against Plaintiff on the basis of her race, in violation of NYCHRL, by creating, fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or to remedy a hostile work environment that included, among other things, harassment of Plaintiff because of her race.

80. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of Section NYCHRL, Plaintiff has suffered and continues to suffer substantial losses,

including the loss of past earnings, the loss of future earnings, and the loss of other employment benefits in an amount to be proved at trial.

81. As a direct and proximate result of Defendants' actions, Plaintiff suffered and continues to suffer severe and lasting embarrassment, humiliation, mental and physical anguish and other incidental consequential damages and expenses in an amount to be proved at trial.

82. Defendants have acted with malice or reckless indifference to the Plaintiff.

83. Therefore, Plaintiff is entitled to all remedies and relief afforded by NYCHRL, including but not limited to, back pay, front pay, emotional distress, punitive damages and attorney's fees and costs, as well as any and all injunctive relief.

SIXTH CLAIM FOR RELIEF AGAINST DEFENDANTS
Retaliation under the NYCHRL

84. Plaintiff hereby incorporates all preceding paragraphs of this complaint with the same force and effect as if fully set forth at length.

85. Defendants have and continue to retaliate against Plaintiff because she complained about the unlawful discrimination and harassment to which she was subject, in violation of NYCHRL.

86. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of NYCHRL, Plaintiff has suffered and continues to suffer substantial losses, including the loss of past earnings, the loss of future earnings, and the loss of other employment benefits in an amount to be proved at trial.

87. As a direct and proximate result of Defendants' actions, Plaintiff suffered and continues to suffer severe and lasting embarrassment, humiliation, mental and physical anguish and other incidental consequential damages and expenses in an amount to be proved at trial.

88. Therefore, Plaintiff is entitled to all remedies and relief afforded by NYCHRL, including but not limited to, back pay, front pay, emotional distress, punitive damages and attorney's fees and costs, as well as any and all injunctive relief.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests a judgment against the Defendants:

- a. Declaring that the Defendants have violated the aforementioned statutes;
- b. Preliminary and permanent injunctions against Defendants and their officers, owners, agents, successors, employees, representatives, and any and all persons acting in concert with them, from engaging in each of the unlawful practices, policies, customs, and usages set forth herein;
- c. An order restraining Defendants from any retaliation against any individual, including Plaintiff, for participating in this lawsuit in any form;
- d. Awarding future income to Plaintiff in an amount to be proven at trial, representing all loss of future earnings, including reasonable and expected increases, loss of retirement income, diminution in Plaintiff's prospective social security benefits which will be computed over the Plaintiff's prospective statistical life expectancy, and all other benefits the Plaintiff would have expected to earn during the Plaintiff's lifetime had it not been for Defendants' unlawful discrimination;
- e. Awarding damages to the Plaintiff to make the Plaintiff whole for any economic losses suffered as a result of such unlawful employment practices;
- f. Awarding statutory penalties;
- g. Awarding Plaintiff compensatory damages for mental and emotional distress, pain and suffering in an amount to be proven at trial;

- h. Awarding Plaintiff punitive damages;
- i. Awarding Plaintiff attorneys' fees and costs and expenses incurred in the prosecution of the action;
- j. Awarding pre and post-judgment interest as provided by law;
- k. Awarding Plaintiff such other and further relief as available under the statutes;
- l. Awarding Plaintiff such other and further relief as the Court may deem equitable, just and proper to remedy the Defendants' unlawful employment practices.

JURY DEMAND

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

Dated: New York, New York
April 5, 2019

Respectfully submitted,
LAW OFFICES OF WILLIAM CAFARO



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