

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

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NINA ZHUO,

Case No.:

Plaintiff,

COMPLAINT

-against-

UNAPOLOGETIC FOODS LLC &
TAPESTRY MANAGEMENT LLC,

**PLAINTIFF DEMANDS
A TRIAL BY JURY**

Defendants.

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Plaintiff NINA ZHUO (“Plaintiff”), by her attorneys, PHILLIPS AND ASSOCIATES, PLLC hereby complains of the Defendants, upon information and belief, as follows:

NATURE OF THE ACTION

1. This lawsuit concerns a restaurant group that permitted its Director of Operations, Santo Pesantez (“Pesantez”), to use his authority over young female subordinates to sexually harass them. Throughout Plaintiff’s employment as a Host at Semma, Defendants’ (later defined) award-winning South Indian restaurant, Pesantez repeatedly commented on Plaintiff’s body, touched Plaintiff and her female colleagues without their consent, made sexual remarks about female guests’ bodies, and used Defendants’ reservation and security systems to snoop on guests he found attractive, including actress Kate Hudson.
2. Plaintiff’s supervisors and owners knew about Pesantez’s inappropriate conduct but did nothing to stop it until Plaintiff and two other women complained in writing. On January 22, 2026, Plaintiff formally reported Pesantez’s conduct to Defendants’ Human Resources. Defendants subsequently terminated Pesantez but refused to acknowledge that Pesantez engaged in sexual harassment or discuss any measures Defendants intended to take to prevent subsequent sexual harassment in the workplace. Defendants’ failure to assure Plaintiff and

her colleagues that Defendants would prevent future workplace sexual harassment ultimately forced Plaintiff to resign her position.

3. Based on these facts, Plaintiff brings this action pursuant to Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C.A. §§ 2000e et seq. (“Title VII”), the New York State Human Rights Law, N.Y. Exec. Law §§ 296 et seq. (“NYSHRL”), and the New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101 et seq. (“NYCHRL”), and seeks relief and damages to redress the injuries she has suffered as a result of being sexually harassed and subjected to a hostile work environment on the basis of her sex/gender (female). Plaintiff seeks compensatory damages for economic losses and emotional distress and punitive damages.

JURISDICTION, VENUE, AND PROCEDURAL PREREQUISITES

4. Jurisdiction of this Court is proper under 28 U.S.C.A. §§ 1331 and 1343 as this action arises under 42 U.S.C.A. § 2000e, et seq.
5. The Court has supplemental jurisdiction over the claims that Plaintiff has brought under State law pursuant to 28 U.S.C.A. § 1367.
6. Venue is proper in this District pursuant to 28 U.S.C.A. § 1391(b) as Defendants reside within the Southern District of New York and/or the acts complained of occurred therein.
7. By: (a) timely filing a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) on June 12, 2026; (b) receiving a Notice of Right to Sue from the EEOC on June 30, 2026; and (c) commencing this action within 90 days of the issuance of the Notice of Right to Sue by the EEOC, Plaintiff has satisfied all of the procedural prerequisites for the commencement of the instant action. A copy of the Notice of Right to Sue is attached hereto as Exhibit A.

PARTIES

8. Plaintiff is a twenty-three-year-old Asian woman and resident of the State of New York, County of New York.
9. Defendant UNAPOLOGETIC FOODS LLC (“UNAPOLOGETIC FOODS”) is a limited liability company duly existing pursuant to, and by virtue of, the laws of the State of New York.
10. Upon information and belief, UNAPOLOGETIC FOODS has its principal place of business at 140 West 32nd Street, New York, New York 10001.
11. UNAPOLOGETIC FOODS operates restaurant and hospitality businesses in New York City including Dhamaka, Masalawala & Sons, Rowdy Rooster, Naks, Biryani Bol, Adda located at 107 1st Ave, New York, New York 10003 (“Adda”) and Semma, located at 60 Greenwich Avenue, New York, New York 10011 (“Semma”).
12. Upon information and belief, UNAPOLOGETIC FOODS employed fifteen (15) or more employees at all relevant times, satisfying the statutory threshold for coverage under Title VII.
13. Defendant TAPESTRY MANAGEMENT LLC (“TAPESTRY”) is a limited liability company duly existing pursuant to, and by virtue of, the laws of the State of New York.
14. Upon information and belief, TAPESTRY has its principal place of business at 1512 Benson Street, 3rd Floor, Bronx, New York 10461.
15. TAPESTRY processed payroll and maintained employment records for employees working at Defendants’ restaurant locations, including Semma.
16. Upon information and belief, TAPESTRY employed fifteen (15) or more employees at all relevant times, satisfying the statutory threshold for coverage under Title VII.

17. Defendants TAPESTRY and UNAPOLOGETIC FOODS are referred to collectively as “Defendants”.
18. At all relevant times herein, from approximately November 13, 2025 through July 8, 2026, Plaintiff was an employee of Defendants.

MATERIAL FACTS

Plaintiff’s Employment Background and Pesantez’s Authority

19. On or about November 13, 2025, Plaintiff commenced her employment with Defendants as a Host at Semma.
20. Plaintiff earned \$19 an hour plus tips.
21. Upon her hire, Plaintiff reported to Pesantez who, upon information and belief, is in his mid-fifties.
22. As Director of Operations, Pesantez was Plaintiff’s supervisor and had supervisory authority over Plaintiff, including the ability to control work schedules, determine compensation and raises, propose promotions to employees, and otherwise affect the terms and conditions of her employment.

Pesantez Sexually Harassed Plaintiff

23. Upon hiring, Pesantez began asking Plaintiff sexually inappropriate questions.
24. For instance, Pesantez repeatedly asked Plaintiff if she knew what “yellow fever” meant.
25. Plaintiff was offended by these inquiries as Pesantez explained to her many times that “yellow fever” referred to men with a sexual fetish for Asian women, like Plaintiff.
26. Further, Pesantez would repeatedly speak to Plaintiff about his wife, whom he referred to as “my Japanese”, and other stereotypically “Asian” topics including origami, K-pop, his other Chinese friends, and other stereotypes including looking young.

27. Pesantez also inquired about Plaintiff's specific sexual preferences and whether all Asian women had the same preferences.
28. Pesantez would also make inappropriate comments about Plaintiff's youthful appearance, particularly given that Pesantez was over two decades older than Plaintiff.
29. Pesantez repeatedly insisted to Plaintiff that she looked "young" and appeared to be a "teenager."
30. Pesantez would often make said comments about Plaintiff being a "teenager" before offering her alcoholic beverages.
31. One workday where Plaintiff wore more form-fitting clothing, Pesantez asked Plaintiff if she had "lost weight."
32. Pesantez would also comment that Plaintiff made him "happy" and that she "looked like an adult" when she wore more form-fitting clothing.
33. Plaintiff understood Pesantez's consistent commentary on her attire, weight, and age to mean that he was inappropriately and sexually ogling her at work.
34. Pesantez would also repeatedly request that Plaintiff "smile more" while commenting, in sum and substance, that "your laugh is contagious, but you look so uptight", which are common discriminatory gender-based tropes.
35. Plaintiff's coworkers, including Tessa Tookes ("Tookes"), a Host, warned her that Pesantez would make similarly inappropriate comments about Plaintiff's appearance to them.
36. Eventually, Pesantez's sexual harassment of Plaintiff escalated to physical touching, as without Plaintiff's consent or invitation, Pesantez stroked Plaintiff's hair.
37. Pesantez would also stroke Plaintiff's elbow or place his hand on her lower back to get her attention.

38. During the course of Plaintiff's employment, she learned about numerous instances of Pesantez sexually harassing his subordinates, including taking female team members to strip clubs, taking Tookes out to dinner and asking her about being an OnlyFans model, routing extremely drunk female team members to his house, and inappropriately touching and paying off young girls employed as hosts.
39. Given this knowledge of Pesantez's pattern of sexual harassment, any interaction with Pesantez, from innocent texts to unwelcome touches, became extremely uncomfortable and difficult for Plaintiff to endure.

Pesantez Surveilled Plaintiff and Defendants' Female Customers

40. Pesantez eventually made it known to Plaintiff that he was spying on female guests he found attractive using Defendants' reservation systems and security footage.
41. Specifically, in late November 2025, Pesantez arrived at Semma while Kate Hudson ("Hudson"), a famous Hollywood actress, was dining at Adda, another restaurant owned by Defendants and managed by Pesantez.
42. At the time, Plaintiff and Tookes were working at the host stand at Semma.
43. Pesantez approached the host stand, pulled out his phone and showed Plaintiff and Tookes live security footage of Hudson's table at Adda.
44. The security footage was being streamed to Pesantez's phone from Defendants' security camera system.
45. Pesantez zoomed in on Hudson's face on the security footage.
46. Pesantez then made various inappropriate comments about Hudson's attractiveness to Plaintiff and Tookes.
- 47.

48. Pesantez's use of the security camera footage to spy on female guests, throughout Defendants' network of restaurants, without their knowledge or consent, made Plaintiff uncomfortable.
49. In or around November or December 2025, a young Asian female guest dined at Semma with a young white man.
50. Throughout their meal, Pesantez came up to the host stand to ogle this young woman and made lewd comments to Plaintiff about how much he appreciated her dress since it was low-cut and exposed her chest.
51. Pesantez then inappropriately asked Plaintiff, in sum and substance, why "Asian girls date white guys".
52. Plaintiff was offended by Pesantez's sexually inappropriate comments about Asian women that were approximately Plaintiff's age.
53. Similarly, on December 21, 2025, a guest named Grace Suh ("Suh") made a reservation at Semma for 7:15 p.m.
54. Both Suh and her guest were young Asian women who appeared to be in their early twenties.
55. During these guests' meal, Pesantez approached the host stand and asked Plaintiff if the reservation was under the "Indian girl or the Asian one."
56. The second time Pesantez approached the host stand, he offered a personal detail about the guests.
57. Pesantez's knowledge of this personal information suggested that Pesantez had been speaking to the guests during their meal.
58. When Suh and her guest finished their meal and prepared to leave, Pesantez held the door for them.

59. As Pesantez held the door, he encouraged the two young Asian women to visit Naks and other sister restaurants operated by Defendants.
60. After Pesantez left Semma that evening, Plaintiff checked the reservation system and noticed that an “Alert Santo” tag had been added to Suh’s guest profile.
61. This “Alert Santo” tag was designed to notify Pesantez if Suh made a reservation at any restaurant operated by UNAPOLOGETIC FOODS.
62. Plaintiff brought up this concerning behavior to servers working on the floor that night.
63. None of the servers were surprised by Pesantez using the reservation system to track guests.
64. The lack of reaction by the servers confirmed to Plaintiff that Pesantez’s pattern of targeting young Asian women was unsurprising and well-known to other employees.
65. As Director of Operations with authority over multiple restaurant locations, Pesantez had the ability to access security camera footage at all Defendants’ restaurants.
66. Pesantez demonstrated his comfort and ease abusing access to security camera footage, as evidenced by the Kate Hudson incident at Adda.
67. Pesantez’s ability to add “Alert Santo” tags to guest profiles meant that he could track specific guests across all UNAPOLOGETIC FOODS restaurant locations.
68. On or around December 19, 2025, through December 27, 2025, Plaintiff covered for Tookes as Lead Host for a week.
69. During this week, Pesantez only came into Semma two or three times.
70. Despite Pesantez only physically coming to Semma a couple times that week, he commented to Tookes upon his return that that week “was like a fashion show”.
71. Plaintiff understood this comment to mean that Pesantez had been spying on her using Semma’s security camera all week since Pesantez only came into Semma a few days.

72. Pesantez's pattern of targeting young Asian women for his attention was evident in both his interactions with Plaintiff and his interactions with female guests.
73. Pesantez's sexually inappropriate behavior in front of and towards Plaintiff was unprofessional and created a hostile work environment for Plaintiff.

Plaintiff Complained About Sexual Harassment

74. On or about January 22, 2026, Plaintiff submitted a formal written complaint to Mandi Mason ("Mason"), Defendants' Head of People & Culture, by email, detailing Pesantez's sexual harassment and discriminatory conduct, stating:

Dear Mandi Mason & Unapologetic Human Resources,

I am writing to formally report ongoing concerns regarding the conduct of our Director of Operations, Santo Pestantez [sic].

Since being hired as a host at Semma, the following behaviors have been repeated and persistent: commenting about men with a racial preference towards Asian women; asking about "yellow fever"; remarking on the dating preferences of Asian women; insisting that I look "young" and am a "teenager"; asking if I had "lost weight" when I wore more form fitting clothing; commenting that I made him "happy" and "look like an adult" when I wore more form fitting clothing; commenting on my appearance to my coworkers; on one occasion, stroking my hair without consent or invitation.

Santo's behavior has been unprofessional, inappropriate, and uncomfortable. Seeing this behavior reflected in his interactions with young Asian female guests raises further concerns with his conduct as it reflects on Semma and UNAPOLOGETIC FOODS as a whole.

On December 21, 2025, a guest was seated at 210 with a 7:15pm reservation under the name Grace Suh. Both Grace and her guest were two young Asian women who looked to be in their early twenties. Throughout the duration of their meal, Santo approached me at the host stand twice, once to ask if the reservation was under the "Indian girl or the Asian one" and then again to offer a personal detail about the guests that suggested he had been speaking to them. Santo held the door for them on the way out and encouraged them to come to Naks and other sister restaurants. Santo left Semma

shortly after, at which point I noticed that an “Alert Santo” tag had been added to Grace’s guest profile, a concerning development ensuring that, if Grace were to dine at any restaurant under UNAPOLOGETIC FOODS, Santo would be notified. No one seemed concerned with this behavior when I brought it up to servers on the floor that night. In fact, the comments made (“Yeah, he likes his little Asian girls”) confirmed that this is a repeated and unsurprising pattern of behavior.

Of further concern is Santo’s demonstrated comfort and ease abusing access to security camera footage at restaurants across UNAPOLOGETIC FOODS. In late November, when Kate Hudson dined at Adda, Santo approached the host stand and showed us (Tessa Tookes and me) live security footage of her table on his phone, zooming in on her face and making repeated comments that she is “very pretty.” Not only is this a violation of Miss Hudson’s privacy and her expectations of discretion and respect while dining at Adda, it is indicative of a larger pattern of voyeuristic surveillance that could subject other guests, like Grace, to his unwanted attention and gaze.

Recently, he verbally proposed a promotion that would have me splitting my time lead hosting at Semma and Adda. I found myself unable to pursue further conversation on this opportunity without fear of being alone in his company and wary of what strings may be attached to his offer.

On an individual and personal level, Santo’s conduct is a hindrance to my professional growth and has come to take a toll on my general well being. I have done my best to limit my interactions with Santo, speaking to him only when professionally necessary. Even so, I am constantly on edge at work and, after hearing reports of similar, and in fact more predatory behavior from Santo towards my coworkers, including physical confrontation and professional retaliations, I find myself increasingly concerned for my personal safety. Understanding his behavior as part of a larger pattern of workplace harassment endangers both guests and Semma team members alike and, at the very least, warrants investigation.

I appreciate your prompt consideration of all of the above and hope to resolve this as quickly and as thoroughly as possible.

My deepest concerns,

Nina Zhuo

75. That same night, Pesantez gave Plaintiff a bottle of wine and told her not to tell anyone about the gift.
76. On or around January 26, 2026, at 1:30 p.m. Plaintiff met with Mason virtually by Google Meet to further discuss her complaint of sexual harassment.
77. Mason responded that Defendants could not address Plaintiff's safety concerns because, in sum and substance, Pesantez has "free will" and that Plaintiff should feel empowered to "exercise her rights."
78. Thereafter, Plaintiff was informed that Pesantez was no longer with the company. In sum and substance, Mason told Plaintiff, "[Pesantez] is gone now. I hope that alleviates the stress you've been experiencing."
79. Nevertheless, on or about January 27, 2026, Plaintiff also discovered that Pesantez had a reservation at Semma on January 31, 2026, scheduled during Plaintiff's shift.
80. On or about January 30, 2026, Plaintiff sent a follow-up email to Mason expressing her ongoing concerns about her safety, stating:

Hi Mandi!

Thank you for making the time for our conversation Monday. I appreciate your shared concern regarding Santo's reservation at Semma this Saturday and hope this issue is resolved with the safety of Semma guests and staff in mind. I remain fearful of my well being should he make an appearance at any point and would appreciate it if I could remain informed on what precautions and safeguards will be put in place should he attempt any sort of retaliation, physical or otherwise, tomorrow or farther in the future.

I'd also like to follow up on further investigation into the significance of the "Alert Santo" tags added to guest profiles of young women. Though I witnessed only the two girls on the night of Dec 21, the dismissive reactions [sic] I received leads me to believe this was a common pattern of behavior. I am similarly concerned for the safety of all involved.

Thank you for your due diligence in this matter and I look forward to seeing you at sexual harassment training this week.

81. On or about March 11, 2026, Plaintiff completed the mandatory sexual harassment training video. Plaintiff was distressed by the instances in the video which mirrored her experiences of being sexually harassed by Pesantez.
82. Plaintiff complained to Mason about same:

mandi:

apologies for the delay, it took much longer than anticipated for me to get through the training for a multitude of reasons, after trying and failing to complete the training on several occasions previously, i experienced some technical challenges throughout the day yesterday that made it difficult to reach the final page, but I have the final certificate attached to this email.

in addition to the technical challenges, the constant reminders throughout the training of what the women at this company endured under santos leadership was extremely distressing, making the training a personal difficulty that resulted in me starting and restarting the training about five or six times.

how many women suffered santos abuse – or any other management entity’s abuse – in silence because they were not immediately provided with information about their legal rights and protections? several of the actions explicitly listed in the training (inappropriate questions and comments, unwanted and uncomfortable attention, non consensual physical contact, etc) were things i experienced my very first day working in santos presence, things that i continued to experience throughout my time under santos frankly disturbingly watchful eye, things that i learned other women at uaf experienced to varying degrees of extremity, which made me all the more uncomfortable.

no one i've spoken to thus far received sexual harassment training upon hiring. These once annual mandates are informative, but because they seem to only be required during a fixed time period, they offer little by way of knowledge and protection for anyone hired outside the fixed time period. complacency in the face of these abuses makes far more sense to me knowing that the information provided by the sexual harassment training was not readily available to any person hired outside of the Jan-Feb window each year, but does not make that complacency any less excusable. i love my coworkers but sometimes

i look around and i wonder how many of them he hurt? how many of them knew about what he was doing, how many people he was hurting, and let him get away with it because they needed the job? it's heartbreaking and awful.

in light of recent events, are there plans mandate [sic] the training upon hiring to ensure each employee is informed of what constitutes as sexual harassment and steps to prevent and confront harassment in the workplace? further, what protections are being put in place to protect employees from sexual harassment of any kind in the future? any assurance on this matter would be helpful to me.

thank you for your due diligence.

nina

83. As a result of Pesantez's sexual harassment and the hostile work environment, Plaintiff suffered and continues to suffer severe emotional distress, humiliation, and fear for her personal safety.
84. As such, Plaintiff has sought treatment for PTSD, anxiety, and depression.
85. Plaintiff requested a reasonable accommodation in the form of time off to address these conditions.
86. Despite her request for time off, Plaintiff could no longer tolerate working at Semma and submitted her resignation on or about July 6, 2026, by emailing Mason, as follows:

Please consider this my formal resignation from my position at Semma, effective immediately. Due to continued stress from the traumas suffered under Unapologetic Foods, employment at this company has proved to be a detriment to my mental health and physical well-being.

87. On or about July 8, 2026, Mason responded accepting Plaintiff's resignation. However, Mason mischaracterized Plaintiff's constructive discharge as a "voluntary resignation of employment" and denied that Plaintiff experienced any harassment or hostility during her employment. Mason wrote, in relevant part:

Responding to your comment in your voluntary resignation notice that you experienced “trauma” at the restaurant, we reject such assertion and any other contention that you experienced inappropriate conduct or mistreatment during your employment.

88. The harassment was severe and pervasive, altering the terms and conditions of Plaintiff’s employment and creating an abusive working environment.
89. At all relevant times, Defendants knew or should have known of Pesantez’s harassment of Plaintiff and other female employees because Pesantez was the Director of Operations exercising supervisory authority over Plaintiff.
90. Defendants also knew or should have known of Pesantez’s harassment because Plaintiff’s coworkers confirmed that his pattern of targeting young Asian women was repeated, known, and unsurprising.
91. Despite taking remedial action after Plaintiff’s complaint, Plaintiff continues to fear for her safety due to Pesantez’s harassment and reports of his physical confrontation and professional retaliation against other coworkers.
92. Defendants are strictly liable for Pesantez’s harassment as he was the Director of Operations, thus acting with actual or apparent authority as Plaintiff’s supervisor when he engaged in the harassing conduct.
93. Defendants’ actions and conduct were intentional and intended to harm Plaintiff.
94. Defendants’ conduct has been malicious, willful, outrageous, and conducted with full knowledge of the law.
95. As such, punitive damages are warranted against Defendants.

AS A FIRST CAUSE OF ACTION
SEXUAL HARASSMENT AND
HOSTILE WORK ENVIRONMENT UNDER TITLE VII

96. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.
97. This claim is authorized and instituted pursuant to the provisions of Title VII for relief based upon Defendants' unlawful employment practices.
98. Title VII prohibits discrimination with respect to terms, conditions, or privileges of employment based upon sex.
99. Defendants engaged in unlawful employment practices by subjecting Plaintiff to sexual harassment and a hostile work environment on the basis of her sex/gender (female).

AS A SECOND CAUSE OF ACTION
SEXUAL HARASSMENT AND
HOSTILE WORK ENVIRONMENT UNDER THE NYSHRL

100. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.
101. The New York State Executive Law § 296(1)(a) provides that:
- “It shall be an unlawful discriminatory practice: For an employer ... 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.”
102. Defendants engaged in unlawful employment practices in violation of the New York State Executive Law § 296(1)(a) by subjecting Plaintiff to sexual harassment and a hostile work environment on the basis of her sex/gender (female).

AS A THIRD CAUSE OF ACTION
SEXUAL HARASSMENT AND
HOSTILE WORK ENVIRONMENT UNDER THE NYCHRL

103. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this Complaint.

104. New York City Administrative Code § 8-107(1)(a) provides that:

It shall be an unlawful discriminatory practice: (a) For an employer or an employee or agent thereof, because of the actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, uniformed service 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.

105. Defendants engaged in unlawful discriminatory practices in violation of New York City Administrative Code § 8-107(1)(a) by subjecting Plaintiff to sexual harassment and a hostile work environment on the basis of her sex/gender (female).

106. The NYCHRL is to be construed liberally for the accomplishment of the uniquely broad and remedial purposes thereof, and provides the broadest protections against sexual harassment and discrimination available by law.

JURY DEMAND

107. Plaintiff demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment against Defendants:

- A. Declaring that Defendants engaged in unlawful employment practices prohibited by Title VII, the NYSHRL, and the NYCHRL in that Defendants discriminated against Plaintiff and subjected her to sexual harassment and a hostile work environment on the basis of her sex/gender (female);

- B. Awarding damages to Plaintiff for all lost wages and benefits resulting from Defendants' unlawful discrimination and to otherwise make her whole for any losses suffered as a result of such unlawful employment practices in an amount to be proven at trial;
- C. Awarding Plaintiff compensatory damages for mental, emotional and physical injury, distress, pain and suffering, humiliation, embarrassment, and injury to her reputation in an amount to be proven at trial;
- D. Awarding Plaintiff punitive damages in an amount to be proven at trial;
- E. Awarding Plaintiff reasonable attorneys' fees, costs, and expenses incurred in the prosecution of this action pursuant to 42 U.S.C.A. § 2000e-5(k), N.Y. Exec. Law § 297(10), and N.Y.C. Admin. Code § 8-502(f);
- F. Awarding Plaintiff pre-judgment and post-judgment interest as allowed by law; and
- G. Awarding such other legal and equitable relief as this Court deems necessary, just, and proper.

Dated: New York, New York
July 27, 2026

**PHILLIPS & ASSOCIATES,
ATTORNEYS AT LAW, PLLC**

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