

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

THERESA WAIGUCHU,

Plaintiff,

-against-

MORGAN STANLEY & CO. LLC,

Defendant.

Case No.:

COMPLAINT

JURY TRIAL DEMANDED

Theresa Waiguchu (“Plaintiff” or “Ms. Waiguchu”), by and through her attorneys, Mesidor PLLC, against Morgan Stanley & Co. LLC (“Defendant” or “Morgan Stanley” or “the Company”), alleges upon knowledge as to herself and her own actions and upon information and belief as to all other matters as follows:

NATURE OF CLAIMS

1. Ms. Waiguchu, by and through her undersigned counsel, alleges discrimination based on her gender, race, and disability, constituting violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000 *et seq.* (“Title VII”); Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981; (“Section 1981”); the Americans with Disabilities Act of 1990, 42 U.S.C. § 12101, *et seq.* (“ADA”); the State of New York Human Rights Law, N.Y. State §§ 290 *et seq.* (“NYSHRL”); and the New York City Human Rights Law, New York City Administrative Code § 8-107 *et seq.* (“NYCHRL”). She further alleges violations of her rights under the Family Medical Leave Act (“FMLA”).

2. As a Vice President of Securities-Based Lending Solutions in the Pipeline Management Team, Ms. Waiguchu was responsible for handling numerous escalations of transactions. Throughout her time at Morgan Stanley, Ms. Waiguchu consistently demonstrated a strong work ethic and dedication to her role. Although Morgan Stanley constantly moving the

goalposts and refusing to provide distinction between the Assistant Vice Presidents (“AVPs”) and the Vice President (“VP”) role, Ms. Waiguchu brought new and innovative ideas to the table and overall strive to take on challenges with great skill.

3. Despite early praise for her quick learning of this challenging role, Ms. Waiguchu’s capabilities were quickly overshadowed by Morgan Stanley’s discrimination. What began as demeaning and belittling comments from her manager towards Ms. Waiguchu and her colleague, Rebecca Jones, the only other black woman and VP on her team, rapidly devolved into constant surveillance and cruelty from her new manager, as well as consistent dismissal of her and her family’s medical needs.

4. Morgan Stanley continued to tell Ms. Waiguchu she fell short of the expectations of her role, while simultaneously refusing to provide her with any parameters, and either ignoring or actively sabotaging her continued attempts to meet their impossible standard. When she attempted to report her managers’ conduct and identify it explicitly as racist microaggressions, discrimination, and retaliation, she would be dismissed, gaslit, and belittled.

5. As a result of the ongoing discrimination, Ms. Waiguchu has suffered significant damage to her mental and physical health, including multiple hospitalizations and diagnoses of work-induced anxiety and stress, as well as Post Traumatic Stress Disorder.

PARTIES

Plaintiff

6. Ms. Waiguchu joined Morgan Stanley on May 22, 2022, as a VP in the U.S. Banks division. She held this position until the continued harassment led to her ongoing disability-related leave.

7. In this role, Ms. Waiguchu earned a total compensation of \$150,000 per annum, with discretionary pro-rated bonuses, and benefits.

8. Ms. Waiguchu resides in the State of New York.

9. Throughout her employment with Morgan Stanley, Ms. Waiguchu has worked primarily within the Southern District of New York.

Defendant

10. At all relevant times herein, upon information and belief, Morgan Stanley is and has been a multinational financial institution, offering an array of financial services. The New York Office and World Headquarters, where Ms. Waiguchu was employed, is located at 1585 Broadway, New York, NY, 10036.

11. At all times relevant, Defendant employed more than fifteen employees.

12. From May 2022 until present, Morgan Stanley has been Ms. Waiguchu's employer within the meaning of all applicable statutes.

JURISDICTION AND VENUE

13. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because Plaintiff asserts federal law claims under Title VII, Section 1981, the ADA, and FMLA.

14. Venue is proper in this judicial district under 28 U.S.C. § 1391(b)(2) because a substantial part of the events and omissions giving rise to the claims alleged herein occurred in this District.

ADMINISTRATIVE PREREQUISITES

15. On June 24, 2025, Plaintiff timely filed a complaint, upon which this Complaint is based, with the United States Equal Employment Opportunity Commission ("EEOC").

16. On June 25, 2025, the EEOC issued a Notice of Right to Sue to Plaintiff, with respect to the instant charges of discrimination. A copy of the Notice is annexed to this Complaint.

17. This action is being commenced within 90 days of receipt of the Notice of Right to Sue.

FACTUAL ALLEGATIONS

Morgan Stanley Failed to Address Discrimination Against Ms. Waiguchu Based on her Race and Gender from Former Supervisor Jens Krause

18. From her very first performance review, Morgan Stanley recognized Ms. Waiguchu for her strong work ethic and professionalism. She was described as a quick learner, praised for her diligence, and widely regarded as excellent in her role.

19. Despite this positive feedback, Jens Krause (“Mr. Krause”), who prepared both this and her subsequent review, noted that Ms. Waiguchu was “defensive and judgmental” in her communications with colleagues. He advised her to “consider the other party’s intentions” when responding to workplace interactions.

20. This emphasis on “intent” over impact would become a recurring theme in Mr. Krause’s treatment of both Ms. Waiguchu and the only other Black woman on her team, Rebecca Jones (“Ms. Jones”). Mr. Krause and other Morgan Stanley employees consistently relied on this framing to dismiss or downplay the microaggressions directed to the two black women on the team.

21. On February 8, 2023, Ms. Waiguchu first requested a “long-term roadmap” from Mr. Krause to better understand her responsibilities as a Vice President on the pipeline management team, particularly in comparison to those of the Assistant Vice Presidents (AVPs).

The absence of a clearly defined distinction between the VP and AVP roles would later be used to rationalize the disparate treatment towards Ms. Waiguchu and Ms. Jones, the only two Vice Presidents on the team.

22. Notably, the original job listing for the pipeline management team contained no substantive differences between the AVP and VP positions, leaving Ms. Waiguchu uncertain about how her role was expected to differ from that of her AVP colleagues. During their call, Mr. Krause admitted that there were no concrete metrics or criteria to evaluate the VP role, aside from a vague expectation that Vice Presidents would handle more “complex and substantive” assignments than AVPs.

23. Despite the purported complexity of VP assignments, Ms. Waiguchu observed that the more substantive and high-impact assignments were routinely delegated to associates, AVPs, and analysts, bypassing both herself and Ms. Jones. Determined to prove her value, Ms. Waiguchu proactively volunteered for additional responsibilities, sought out challenging projects, and even proposed original initiatives to improve team performance. Rather than being recognized, her ideas were frequently co-opted and reassigned to lower-ranking colleagues. her contributions were overlooked, and she was repeatedly told that she had failed to meet the undefined expectations of her role.

24. In addition to denying her access to meaningful, career-advancing assignments, Mr. Krause routinely demonstrated overt favoritism toward employees with children, while penalizing Ms. Waiguchu based on her parental status.

25. For instance, on February 16, 2023, Mr. Jens Krause met with Ms. Waiguchu to discuss her “punctuality,” noting that he had observed her arriving to the office late on several

occasions. Ms. Waiguchu explained that any delays were infrequent and typically the result of factors beyond her control, such as public transit disruptions or traffic. She emphasized that, regardless of her arrival time, she remained committed to her responsibilities, often beginning her workday remotely during her commute and informing both Mr. Krause and the team of any delays.

26. Ms. Waiguchu pointed to a recent example where, despite suffering from a migraine and being delayed by traffic, she joined a team video call from her Uber and continued working while in route to the office, arriving by 9:40 a.m. Ms. Waiguchu reiterated that she consistently made every effort to begin work by 9:00 a.m., even under difficult circumstances, and that she had voluntarily disclosed her disability to Mr. Krause in good faith.

27. Rather than acknowledge Ms. Waiguchu's efforts or accommodate the impact of her documented medical condition, (*see infra* ¶¶ 81-87), Mr. Krause berated Ms. Waiguchu during the meeting, repeatedly shouting at her to "listen" and lectured her on the importance of punctuality in a condescending and hostile tone. When Ms. Waiguchu raised concerns about the disparate treatment, pointing out that other colleagues occasionally arrived late or left early due to personal or family obligations without similar scrutiny, Mr. Krause dismissed her observations, claiming their situations were "different" because they had children.

28. Mr. Krause invalidated Ms. Waiguchu's explanations, stating that lateness due to childcare obligations was acceptable, but that since Ms. Waiguchu did not have children, she should "learn to catch an earlier train." On multiple occasions, he prioritized employees with children over both Ms. Waiguchu and her colleague, Ms. Jones. For example, he once instructed them to defer to colleagues with children when requesting vacation time, asserting that "people with children are limited in the time they can take off." This repeated pattern of preferential

treatment made it unmistakably clear that, in Mr. Krause's view, Ms. Waiguchu's contributions, and those of others without children, were inherently less valuable. The discriminatory and exclusionary environment he created left Ms. Waiguchu feeling consistently marginalized and professionally diminished.

29. Although Ms. Waiguchu had given notice and stayed engaged during her commute, Mr. Krause kept making belittling comments, even suggesting she was not smart enough to understand catching an earlier train. This was just one of several times Mr. Krause spoke to Ms. Waiguchu in a degrading and condescending way.

30. When Ms. Waiguchu reported Mr. Krause's discriminatory conduct to Morgan Stanley, her concerns were dismissed outright. Both the company and Mr. Krause attempted to excuse his behavior as a harmless aspect of his "communication style," going so far as to attribute it to his German nationality, a rationale that was both inappropriate and trivialized her legitimate complaints of discriminatory treatment. Mr. Krause's continued belittling exacerbated Ms. Waiguchu's emotional distress and contributed significantly to her mental suffering.

31. During a call regarding data hygiene issues, Mr. Krause continued his pattern of belittling and condescending behavior, particularly toward the black women on his team. The discussion centered around Ms. Waiguchu's data input on a document for which Mr. Krause had provided vague and incomplete instructions. Based on an established practice from prior projects, Ms. Waiguchu reasonably inferred that she should input a zero value when data was unavailable. This confusion was not unique to Ms. Waiguchu and clearly stemmed from a broader lack of instruction.

32. Although Mr. Krause superficially acknowledged his role in the miscommunication, he refused to offer meaningful clarification. Instead, he insisted that Ms. Waiguchu should have “intuitively understood” his expectations, expressing “surprise” that she felt she had not received adequate guidance or training for a project he claimed to take seriously. He further stated that “everyone else brought on the team” before Ms. Waiguchu had been properly “brought up to speed,” a pointed remark that deflected blame and subtly cast doubt on her competence.

33. Rather than taking accountability for his failure to provide adequate training, Mr. Krause dismissed Ms. Waiguchu’s concerns, stating her misunderstanding didn’t “compute” with him. He then subjected Ms. Waiguchu to a demeaning and unproductive line of questioning, posing confusing, hyper-specific, queries with predetermined answers. Instead of offering substantive feedback, he delivered passive-aggressive remarks such as, “That’s what an escalation is, right?” and “If you had followed my last instructions...”

34. Most troubling was his comment that the correct answers to his questions were “crystal clear,” adding, “but it doesn’t seem like it is to you or [Ms. Jones].” This remark not only singled out both black women but also reinforced a pattern of condescension and exclusion. Despite the confusion being the result of his own unclear direction, Mr. Krause refused to resolve the matter during the call, merely stating he would follow up with both Ms. Waiguchu and Ms. Jones at a later time.

35. During a March 24, 2023, meeting, Mr. Krause berated Ms. Waiguchu and Ms. Jones regarding their edits to an internal document. Mr. Krause stated, “Forgive me, but I find it funny that English is my second language, and I have to teach English-speaking employees how

to write in English.” He then proceeded to highlight sections of the document and instructed them to “look these words up in the dictionary,” which he did before asking condescendingly, “Now that we know the definitions and meaning of these words, do you think they belong in these sentences?” This demeaning approach stood in stark contrast to how white and male colleagues were treated when receiving feedback for similar work product.

36. After Ms. Waiguchu and Ms. Jones reported Mr. Krause’s conduct to Managing Director Alex Stetter (“Mr. Stetter”), their concerns were summarily dismissed. In response to their complaints, Mr. Stetter dismissed Ms. Waiguchu’s and Ms. Jones’s concerns and subjected them to an adversarial line of questioning. He pressed the women to explain whether they had failed to deliver on Mr. Krause’s request, or whether Mr. Krause was simply being unreasonable. Mr. Stetter further demanded that Ms. Jones and Ms. Waiguchu provide him with all project-related emails so that he could review them one by one to determine whether their concerns were “valid.” Despite being presented with this detailed information, Mr. Stetter took no corrective action.

37. Almost immediately afterward, Mr. Krause removed Ms. Waiguchu from a large project. Although he claimed, when asked directly by Ms. Waiguchu, that the decision was based solely on the project’s staffing needs and not her performance, this explanation was later contradicted in Ms. Waiguchu’s performance review. In that review, Mr. Krause criticized the quality of the project. He stated he had been forced to complete it himself because it was not up to his standards, strongly suggesting a retaliatory motive in excluding Ms. Waiguchu from meaningful assignments.

38. At this point, it became evident to both Ms. Waiguchu and Ms. Jones that they were being subjected to both discriminatory treatment and retaliation by Mr. Krause, and that their initial complaint to Mr. Stetter had been disregarded. This prompted a follow-up meeting with Human Resources in early April 2023, during which Ms. Waiguchu and Ms. Jones raised concerns about what they described as “collective and individual... aggressive communication” from Mr. Krause. They also expressed fears that he would retaliate further by issuing negative performance evaluations, either due to racial and gender-based bias or in response to their complaints.

39. During the meeting, Ms. Waiguchu recounted an incident where Mr. Krause shouted at her in front of multiple colleagues, once again targeting her for her supposed “negative personality trait” of defensiveness. Marcel Adams, the assigned HR representative, attempted to downplay the issue by asking whether Mr. Krause’s behavior might simply be a “communication issue.” Ms. Waiguchu responded by explicitly identifying the conduct as a microaggression.

40. After requesting additional documentation, Mr. Adams stated that the matter would be investigated pursuant to Morgan Stanley’s anti-retaliation policy, a policy that was referenced repeatedly in subsequent meetings, yet never enforced in any meaningful way. No substantive action was ever taken to address the concerns raised by Ms. Waiguchu and Ms. Jones.

41. Despite having formally reported Mr. Krause’s discriminatory and retaliatory conduct, Ms. Waiguchu and Ms. Jones remained under his management and continued to experience ongoing microaggressions and retaliation. They consistently updated and reported these escalating concerns to Human Resources.

42. On May 16, 2023, Mr. Krause was reassigned to a new position as Head of Asset Management for Ultra High Net Worth SBL Life Insurance and Collateral. This transfer was

surprising to Ms. Waiguchu, as Morgan Stanley’s employee handbook contains a general prohibition on internal transfers prior to the completion of 18 months in a given role, a threshold Mr. Krause had not met.

43. Ms. Waiguchu received no formal update from Human Resources regarding the status or outcome of the investigation. She followed up repeatedly with Marcel Adams, the assigned HR representative, and finally received a response on July 17, 2023. At that time, she was informed that there was “no evidence,” verbal or written, to substantiate the complaints she and Ms. Jones had raised. HR ultimately concluded that Mr. Krause’s belittling, demoralizing, and retaliatory conduct amounted to nothing more than “miscommunicated feedback,” which was “deemed to be legitimate, appropriate, and based on legitimate business concerns.”

44. During this conversation, Ms. Waiguchu also inquired whether it was standard procedure at Morgan Stanley to leave employees under the direct supervision of managers they had reported for race and gender-based harassment. Mr. Adams confirmed that it was. He also reiterated Mr. Krause’s position that her removal from the earlier project was not performance-related, a claim directly contradicted by Mr. Krause’s own statements in Ms. Waiguchu’s 2023 performance review.

45. Most concerning, Ms. Waiguchu learned that, despite his reassignment, Mr. Krause would still serve as the primary reviewer for both her and Ms. Jones’s 2023 performance evaluations. This was particularly alarming given their explicitly stated concerns that his bias and prior retaliation would negatively affect their career advancement and standing at Morgan Stanley.

Morgan Stanley continued to discriminate against Ms. Waiguchu under her New Supervisor, Nina Chotani

46. Unfortunately, Mr. Krause's departure did not curb the discriminatory treatment of Ms. Waiguchu. After Nina Chotani ("Ms. Chotani") replaced Mr. Krause, Ms. Waiguchu experienced an escalating pattern of targeted monitoring and micromanagement that differed from her white and male colleagues.

47. On August 31, 2023, Ms. Waiguchu rescheduled a training-related meeting with a new associate due to a mild illness. In response, her new supervisor, Nina Chotani, replied curtly that she did not believe rescheduling was appropriate given the training objectives and remarked that she "could have assigned [the associate] to someone else." When Ms. Waiguchu responded, questioning the tone and underlying message, Ms. Chotani replied, "I'm on your side as long as you want me to be." When Ms. Waiguchu asked for clarification, Ms. Chotani simply reiterated, "It means just that."

48. Ms. Waiguchu found Ms. Chotani's statement deeply unsettling. The implication that her supervisor's support was conditional, and could be withdrawn at any moment, left her feeling threatened and unsupported. During a subsequent call, Ms. Waiguchu expressed her discomfort explicitly, explaining that she did not believe there should be "sides" in a professional environment.

49. Rather than resolving a minor scheduling misunderstanding with professionalism and empathy, Ms. Chotani escalated the situation and delivered a thinly veiled warning that eroded trust and reinforced the power imbalance between them. Through this exchange, Ms. Waiguchu came to recognize that Ms. Chotani's leadership style offered no meaningful improvement over Mr. Krause's, and in many ways, continued the same pattern of retaliatory and hostile behavior.

50. On September 26, 2023, Ms. Waiguchu participated in a follow-up meeting with Lisa Sweberg (“Ms. Sweberg”) of the Employee Relations Department to address her ongoing concerns about discriminatory treatment and retaliation. Ms. Waiguchu reiterated her fear that the cumulative mistreatment by Mr. Krause, Mr. Stetter, and now Ms. Chotani would negatively impact her upcoming year-end performance review. Despite following all internal reporting protocols, she emphasized that Morgan Stanley had failed at every turn to protect her from microaggressions and workplace harassment.

51. Under Ms. Chotani’s supervision, Ms. Waiguchu noted that the harassment had become “more subtle,” yet remained persistent and was actively escalating. She explained that both herself and Ms. Jones continued to propose projects that were ultimately reassigned to male AVP colleagues, were excluded from critical meetings, and were denied access to key information needed to fulfill their responsibilities. Despite these structural impediments, they were repeatedly criticized for failing to meet the elevated and ill-defined expectations of the Vice President role.

52. Ms. Waiguchu further expressed concern that the adverse treatment appeared to originate from Mr. Stetter, stating that much of the feedback she received from Ms. Chotani was “directly from Alex.” She characterized the ongoing behavior as “workplace sabotage” and drew a direct comparison between the treatment of herself and Ms. Jones, both black women, and their white/non-black male AVP peers, who did not face similar scrutiny or exclusion.

53. Given the continuing hostile environment, Ms. Waiguchu inquired about the possibility of a transfer to another team. Ms. Sweberg quickly dismissed the request, citing the firm’s 18-month minimum service policy and the absence of a specified lateral opportunity. This

rational and hollow, as Ms. Waiguchu pointed out that the same policy had been waived to facilitate Mr. Krause's transfer.

54. Throughout the conversation, Ms. Sweberg made several dismissive and inappropriate remarks, including, "You're saying that Alex now is somehow retaliatory?" and "Did you have a role in mind, or did you expect HR to do it for you?" These comments only deepened Ms. Waiguchu's sense of frustration and confirmed a pattern: when she reported mistreatment in good faith, Morgan Stanley's response was not one of support, but of deflection, denial, and further marginalization. This interaction was yet another example of Ms. Waiguchu being subjected to discriminatory treatment, taking steps to address it internally, and ultimately being met with indifference and disrespect by those tasked with enforcing the company's anti-discrimination policies.

55. In October 2023, Ms. Waiguchu raised concerns with Ms. Chotani regarding the effectiveness and efficiency of the After Action Reports ("AARs"). During this discussion, Ms. Chotani questioned why Ms. Waiguchu's AARs were not completed as quickly as those of her colleagues and why they were more frequently escalated to management for further review. Ms. Waiguchu explained that her reports were often longer and more complex due to the substantive nature of the assignments she routinely received as a Vice President, projects that required greater depth and analysis. She further expressed that the AAR process, as currently implemented, was overly tedious and ill-suited to condensing meaningful insight, as Ms. Chotani appeared to expect.

56. Although Ms. Waiguchu maintained a calm and measured tone throughout the call, she reasonably voiced her frustration with the inefficiencies of the reporting process in the hopes

of improving the system for all users. In response, Ms. Chotani dismissed her concerns, instructing her to “take a step back” and to “be reasonable.”

57. When Ms. Waiguchu reiterated her belief that the process was unnecessarily burdensome and not well-aligned with the team’s objective to serve clients effectively, Ms. Chotani adopted a patronizing tone. Echoing the behavior of Mr. Krause, she asked, “Is everything impactful in every single job?”—a rhetorical question clearly intended to minimize Ms. Waiguchu’s input.

58. Rather than acknowledge Ms. Waiguchu’s experience, particularly as someone who had held the role longer than Ms. Chotani, and consider the constructive feedback being offered, Ms. Chotani dismissed Ms. Waiguchu as ineffective. This exchange further reflected the ongoing pattern of discriminatory and demeaning treatment Ms. Waiguchu faced at Morgan Stanley, where her concerns were repeatedly invalidated, contributions undervalued, and professional judgment undermined.

59. In early November 2023, Ms. Waiguchu participated in a follow-up call with Ms. Sweberg to discuss the findings of the most recent HR investigation. The conversation began with a fundamental misstatement of Ms. Waiguchu’s core complaint. Ms. Sweberg incorrectly summarized the issue as a claim that Ms. Waiguchu and Ms. Jones, as Vice Presidents, were being held to a higher standard than the Assistant Vice Presidents on the team.

60. Ms. Waiguchu immediately corrected this mischaracterization, clarifying that her concern was not about the existence of a higher standard for VPs, but rather that she was not receiving substantive assignments appropriate to her role. Ms. Waiguchu emphasized that because there was no meaningful distinction in responsibilities between the VP and AVP positions, the

expectation of higher performance lacked justification and created a pretext for disparate treatment.

61. Instead of acknowledging this critical clarification, or the fact that her investigation appeared to rest on a false premise, Ms. Sweberg proceeded to deliver her findings, concluding there was no evidence of discrimination. She stated that any differences in how Ms. Waiguchu and Ms. Jones were treated, as compared to their white and male colleagues, were attributable to a “pattern of lateness” and recent concerns about AARs. This conclusion was especially troubling given that following Ms. Waiguchu’s discussion with Ms. Chotani, the AAR process had undergone a complete overhaul, resulting in a more efficient and effective system, due in large part to Ms. Waiguchu’s feedback and leadership. Her efforts to meet the impossible and undefined standards for the VP role were thus weaponized against her, and her proactive contributions were twisted into post hoc justifications for continued exclusion and disparate treatment.

62. In response to Ms. Waiguchu’s concern that Mr. Stetter appeared significantly “less friendly” and less communicative with her compared to her white and male colleagues, Ms. Sweberg dismissed the issue outright. She cited Mr. Stetter’s “open door policy” as conclusive evidence that no bias existed. When Ms. Waiguchu explained that fear of retaliation and past discriminatory experiences made her reluctant to engage with Mr. Stetter directly, Ms. Sweberg responded curtly: “Communication goes both ways.” This call served only to reinforce Ms. Waiguchu’s growing realization that Morgan Stanley’s internal processes for investigating discrimination were not only inadequate, but also actively hostile to employees who raised legitimate concerns.

63. On November 15, 2023, in a one-on-one meeting, Ms. Chotani confronted Ms. Waiguchu about “attacking” her in emails. Ms. Waiguchu denied this, explicitly identified the statement as yet another a microaggression from Ms. Chotani, characterizing her as aggressive, a common stereotype applied to black women.

64. In another particularly revealing interaction on December 5, 2023, Tim Pubins, Head of High Net Worth Lending, continued the pattern of inappropriate racialized comments, referencing his experience as a white man growing up in the south side of Chicago, and being bullied “due to his race” at a majority black high school. Moreover, he stated directly to Ms. Waiguchu, “the managers find it very difficult to manage you because you continue to go to HR with concerns.” This statement directly connected Ms. Waiguchu’s protected activities with management’s negative treatment, an explicit acknowledgment of retaliatory motivation.

65. On December 13, 2023, Ms. Waiguchu received a second performance review from Morgan Stanley, which confirmed her long-standing concerns about retaliation. The review, shaped by both Mr. Krause and Ms. Chotani, reflected a clear departure from objective evaluation and instead echoed the very patterns of disparate treatment Ms. Waiguchu had repeatedly reported. Most notably, the review referenced the project from which Ms. Waiguchu had been removed shortly after filing a complaint against Mr. Krause. Although he had previously assured her that her removal was unrelated to performance, the review now claimed that the project “did not represent a complete assessment of the team processes,” and that Mr. Krause had to “add substantial content to ensure thoroughness.” This revisionist framing directly contradicted his earlier statements and served as a transparent effort to retroactively justify Ms. Waiguchu’s exclusion.

66. The review also once again criticized Ms. Waiguchu's "timeliness" in submitting AARs, ignoring both the complex nature of her assignments and her instrumental role in overhauling the AAR process to improve team-wide efficiency. Her substantive contributions were omitted, and her concerns about unequal treatment were entirely unacknowledged. Ms. Waiguchu's performance review did not reflect a fair assessment of her work, but rather, was a culmination of retaliatory efforts to discredit Ms. Waiguchu following her repeated reports of discrimination and workplace misconduct.

67. Beginning in Spring 2024, Ms. Chotani started to escalate her discriminatory behavior towards Ms. Waiguchu by constantly monitoring and interrogating her regarding her in-office status.

68. On April 10, 2024, Ms. Chotani questioned Ms. Waiguchu's presence in the office following an earthquake, despite clear evidence she was physically present. On May 29, 2024, Ms. Chotani implemented a special "check-in" requirement solely for Ms. Waiguchu, demanding she visit Ms. Chotani's desk when in the office. This heightened and baseless scrutiny was not applied to Ms. Waiguchu's male or white colleagues, illustrating a pattern of disparate treatment.

69. On August 7, 2024, Ms. Chotani criticized Ms. Waiguchu's Teams status settings during a one-on-one meeting, subsequently adding a formal policy in the department rulebook (dated August 21, 2024), indicating a targeted action.

70. On multiple occasions (September 5, February 26, and February 28, 2025), Ms. Chotani monitored Ms. Waiguchu's desk occupancy and movements, even asking colleagues about her whereabouts, a level of surveillance not applied to white or male team members.

71. Ms. Chotani routinely approved remote work and early departures for white and male employees (Adrian Daley, Ed Landis, and Helidon Hasanliaj) while denying similar flexibility to Ms. Waiguchu.

72. Morgan Stanley further engaged in both retaliation against Ms. Waiguchu for exercising her rights under the FMLA. In addition to the documented pattern of inconsistently applied accommodation policies that disproportionately disadvantaged Ms. Waiguchu on the basis of her race, gender, and caregiver status.

73. On January 11, 2024, Ms. Waiguchu submitted a request for a temporary remote work arrangement in order to care for her father, who had been diagnosed with pneumonia. Rather than evaluate the request in good faith, Ms. Chotani subjected Ms. Waiguchu to a series of invasive and inappropriate personal questions, including: “Do you live near your parents?” and “What would you be doing for your father that he would be unable to do for himself?” These inquiries, both irrelevant to the request and deeply personal, were not posed to white or male employees who sought and received similar accommodations.

74. Ms. Chotani further pressed Ms. Waiguchu about when she had last worked in the office for three consecutive days. Having just returned from a pre-approved vacation, Ms. Waiguchu was understandably uncertain. Ms. Chotani responded in a patronizing tone, suggesting they “look at that together now.” Ms. Waiguchu questioned the relevance of this inquiry, particularly in the context of a caregiver accommodation request. When she expressed discomfort with the intrusive nature of the questioning, Ms. Chotani denied the request, forcing Ms. Waiguchu to pursue formal caregiver leave through MetLife, despite clearly stating the desire and ability to continue working remotely during that time.

75. The discriminatory nature of this denial is underscored by the fact that Ms. Chotani had recently approved nearly identical accommodations for white and/or male colleagues. For example, Adrian Daley was permitted to work remotely to care for his ill son, and Helidon Hasanliaj was allowed to work remotely from Spain to care for his sick daughter. The disparate treatment between these cases and Ms. Waiguchu's request reveals a troubling pattern of biased decision-making and discriminatory application of Morgan Stanley's accommodation policies.

Morgan Stanley Retaliated against Ms. Waiguchu for taking Protected FMLA Leave to Care for her Sick Father

76. Following Ms. Waiguchu's protected FMLA leave (September-November 2024), she faced significant barriers to her return and clear retaliatory actions from management at Morgan Stanley.

77. Administrative obstacles prevented Ms. Waiguchu's proper reinstatement, as despite her attempt to return to work, her status remained "inactive" in Morgan Stanley's systems from November 11-17, 2024, causing her to miss the November 15 payroll date.

78. Upon Ms. Waiguchu's return, Ms. Chotani's scrutiny intensified substantially, with documented instances of excessive monitoring not applied to other employees.

79. Most significantly, on January 6, 2025, Ms. Waiguchu's annual bonus was reduced by more than 50% compared to the previous year. Alex Stetter explicitly stated this reduction was "adjusted to include the two months that [she] was out for FMLA," a direct and documented admission of FMLA retaliation. Ms. Waiguchu also received only a 1% merit increase, well below the company average.

80. Ms. Waiguchu was removed from substantive projects and given nominal assignments without proper authority, further demonstrating Morgan Stanley's continued retaliatory intent.

Morgan Stanley failed to Accommodate Ms. Waiguchu's Documented Disability

81. Contemporaneously, Morgan Stanley repeatedly failed to provide reasonable accommodations for Ms. Waiguchu's well-documented disabilities, including chronic migraines and anxiety, openly disregarding the guidance of her treating medical professionals. As the discriminatory treatment worsened, so did her health. Despite medical records clearly documenting how the stress from the ongoing abusive treatment from Morgan Stanley directly contributed to Ms. Waiguchu's medical decline, Morgan Stanley not only failed to grant accommodations but, in fact, revoked the promised, already inadequate measures they insisted she use instead of adequate accommodations.

82. On March 6, 2023, Ms. Waiguchu submitted a medical note from her physician, Dr. Ella Leers, stating that she suffers from long-term health conditions and should be allowed to work from home three days per week, rather than the standard two. This was a modest and entirely reasonable request, made to support Ms. Waiguchu's health while maintaining productivity.

83. Just two days later, on March 8, 2023, Ms. Waiguchu was hospitalized in route to the office after experiencing a dangerously elevated heart rate and severe chest pains. This episode was diagnosed as a panic attack, consistent with her underlying condition of anxiety. The medical team attributed the incident to increased stress stemming from her role at Morgan Stanley, including escalating mistreatment by her then-supervisor, Jens Krause, detailed above. Ms. Waiguchu was forced to take health-related leave for the next two days as a result.

84. Shortly thereafter, Ms. Waiguchu met with Crystal Pruden-Nwachuku (“Ms. Pruden-Nwachuku”) from Morgan Stanley’s Human Resources department to discuss her recently submitted accommodation request. Ms. Pruden-Nwachuku informed Ms. Waiguchu that her request for a modified schedule, specifically, to work from home three days per week as recommended by her physician, was denied. Instead of granting the modest request from her doctor, Ms. Pruden-Nwachuku instead recommended that Ms. Waiguchu utilize the “focus rooms” and “wellness area” provided at the Morgan Stanley office, insisting that these measures would be sufficient to address the severe adverse effects of Ms. Waiguchu’s long-term medical conditions.

85. Yet even this insufficient option was not meaningfully provided to Ms. Waiguchu. From mid-2024 through early 2025, when Ms. Waiguchu attempted to use the focus rooms, in accordance with HR’s guidance, Nina Chotani repeatedly disciplined Ms. Waiguchu for allegedly “over-utilizing” the resource. The most recent instance occurred on February 28, 2025, nearly two years after she had first been directed to use these rooms as an alternative to a modest work-from-home adjustment.

86. By November 2024, Ms. Waiguchu suffered another medical episode while at work, again requiring urgent medical attention. Her medical records now reflect a formal diagnosis of work-induced anxiety and stress, for which she was prescribed ongoing pharmacological treatment. Ms. Waiguchu’s treating physicians have explicitly linked her declining health to the hostile work environment at Morgan Stanley, citing persistent symptoms including insomnia, nausea, loss of appetite, chronic fatigue, and recurrent anxiety attacks, each requiring continued medical care.

87. Most recently, Ms. Waiguchu was diagnosed with Post-Traumatic Stress Disorder (PTSD), further underscoring the severe and lasting psychological harm she endured as a direct result of Morgan Stanley's conduct.

**FIRST CAUSE OF ACTION
FOR DISCRIMINATION UNDER TITLE VII**

88. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

89. 42 U.S.C. § 2000e-2(a)(1) states in part:

It shall be an unlawful employment practice for an employer to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual, or otherwise to discriminate against any individual with respect to their compensation, terms, conditions, or privileges of employment, because such individual's **race**, color, religion, **sex**, or national origin.

(Emphasis Added)

90. As described herein, Defendant discriminated against Plaintiff on the basis of her race and sex, by fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment.

91. As a result of Defendant's unlawful discriminatory conduct in violation of Title VII, Plaintiff suffered economic loss, for which she is entitled to an award of monetary damages and other relief.

92. As a result of Defendant's unlawful discriminatory conduct in violation of Title VII, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

93. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of Title VII, for which Plaintiff is entitled to the maximum allowable damages under this statute and an award of punitive damages.

**SECOND CAUSE OF ACTION
FOR RETALIATION UNDER TITLE VII**

94. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

95. 42 U.S.C. § 2000e-3(a) provides that it shall be unlawful employment practice for an employer:

[T]o . . . discriminate against any of his employees . . . because he has opposed any practice made an unlawful employment practice by this subchapter, or because he has made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under this subchapter.

96. As described herein, Plaintiff engaged in protected activities by complaining of discrimination and retaliation.

97. After Plaintiff engaged in protected activities, Defendant retaliated against Plaintiff as described herein.

98. Such retaliatory treatment would dissuade a reasonable employee from making or supporting a similar complaint of discrimination.

99. As a result of Defendant's unlawful conduct in violation of Title VII, Plaintiff has suffered economic loss, for which Plaintiff is entitled to an award of monetary damages and other relief.

100. As a result of the unlawful conduct of Defendant in violation of Title VII, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and

self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

101. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of Title VII, for which Plaintiff is entitled to the maximum allowable damages under this statute and an award of punitive damages.

**THIRD CAUSE OF ACTION
FOR DISCRIMINATION UNDER SECTION 1981**

102. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

103. 42 U.S.C. § 1981 states, in the relevant part, as follows:

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

104. As described herein, Defendant discriminated against Plaintiff on the basis of her race in violation of Section 1981, by fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment and terminating her employment.

105. As a result of Defendant's unlawful discriminatory conduct in violation of Section 1981, Plaintiff suffered economic loss, for which she is entitled to an award of monetary damages and other relief.

106. As a result of Defendant's unlawful discriminatory conduct in violation of Section 1981, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of

self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

107. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of Section 1981, for which Plaintiff is entitled to an award of punitive damages.

**FOURTH CAUSE OF ACTION
FOR RETALIATION UNDER SECTION 1981**

108. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

109. As described herein, Plaintiff engaged in activities protected by Section 1981 by complaining of racial discrimination.

110. After Plaintiff engaged in protected activities, Defendant retaliated against Plaintiff as described herein.

111. Defendant would not have subjected Plaintiff to a series of adverse employment actions, but for Plaintiff's complaints of discrimination.

112. Such retaliatory treatment would dissuade a reasonable employee from making or supporting a similar complaint of discrimination.

113. As a result of Defendant's unlawful conduct in violation of Section 1981, Plaintiff has suffered economic loss, for which Plaintiff is entitled to an award of monetary damages and other relief.

114. As a result of the unlawful conduct of Defendant in violation of Section 1981, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

115. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of Section 1981, for which Plaintiff is entitled to an award of punitive damages.

**FIFTH CAUSE OF ACTION
FOR DISCRIMINATION UNDER THE NYSHRL**

116. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

117. New York State Executive Law § 296(1)(a) provides that:

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

(Emphasis added).

118. As described herein, Defendant engaged in unlawful employment practices prohibited by the NYSHRL, by discriminating against Plaintiff on the basis of her sex and race by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment.

119. Defendant also failed to engage in the interactive process initiated by Plaintiff for her documented disability of anxiety and migraines in direct violation of the NYSHRL. Defendant discriminated against Plaintiff by, *inter alia*, failing to provide reasonable accommodation for her disability, and refusing to allow her access to even their inadequate alternative to her requested accommodation.

120. As a result of Defendant's unlawful discriminatory conduct in violation of the NYSHRL, Plaintiff suffered economic loss, for which she is entitled to an award of monetary damages and other relief.

121. As a result of Defendant's unlawful discriminatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

122. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of NYSHRL, for which Plaintiff is entitled to an award of punitive damages.

**SIXTH CAUSE OF ACTION
FOR RETALIATION UNDER THE NYSHRL**

123. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

124. Executive Law § 296 provides that:

[i]t 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 filed a complaint, testified, or assisted in any proceeding under this article.

125. As described herein, Plaintiff engaged in protected activities by complaining of sexual harassment and race discrimination.

126. Immediately after Plaintiff engaged in protected activities, Defendant retaliated against Plaintiff as described herein.

127. Defendant would not have subjected Plaintiff to a series of adverse employment actions, but for Plaintiff's complaints of discrimination.

128. Such retaliatory treatment would dissuade a reasonable employee from making or supporting a similar complaint of discrimination.

129. As a result of Defendant's unlawful conduct in violation of the NYSHRL, Plaintiff suffered economic loss, for which Plaintiff is entitled to an award of monetary damages and other relief.

130. As a result of the unlawful conduct of the Defendant's in violation of NYSHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

131. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of NYSHRL, for which Plaintiff is entitled to the maximum allowable damages under this statute and an award of punitive damages

**SEVENTH CAUSE OF ACTION
FOR DISCRIMINATION UNDER THE NYCHRL**

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

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

It shall be an unlawful discriminatory practice: (a) For an employer or agent thereof, because of the actual or perceived age, **race**, creed, color, national origin, **gender**, **disability**, marital status, partnership status, caregiver status, sexual and reproductive health decisions, sexual orientation, uniformed service, height, weight, or immigration or citizenship status of any person . . . to discharge from employment such person; or . . . to discriminate against such person in the compensation or in terms, conditions or privileges of employment.

(Emphasis added).

134. As described herein, Defendant engaged in unlawful employment practices prohibited by the NYCHRL, by discriminating against Plaintiff on the basis of her gender and race

by creating, fostering, condoning, accepting, ratifying, and/or negligently failing to prevent or remedy a hostile work environment.

135. Defendant also failed to engage in the interactive process initiated by Plaintiff for her documented disability of anxiety and migraines in direct violation of the NYCHRL. Defendant discriminated against Plaintiff by, *inter alia*, failing to provide reasonable accommodation for her disability, and refusing to allow her access to even their inadequate alternative to her requested accommodation.

136. As a result of Defendant's unlawful discriminatory conduct in violation of the NYCHRL, Plaintiff suffered economic loss, for which she is entitled to an award of monetary damages and other relief.

137. As a result of Defendant's unlawful discriminatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

138. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of NYCHRL, for which Plaintiff is entitled to an award of punitive damages.

EIGHTH CAUSE OF ACTION
FOR RETALIATION UNDER THE NYCHRL

139. Plaintiff repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

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

It shall be an 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 . . . opposed any practice forbidden under this chapter[.]”

141. As described herein, Plaintiff engaged in activities protected by Section 1981 by complaining of racial discrimination.

142. After Plaintiff engaged in protected activities, Defendant retaliated against Plaintiff as described herein.

143. Defendant would not have subjected Plaintiff to a series of adverse employment actions, if not for Plaintiff's complaints of discrimination.

144. Such retaliatory treatment would dissuade a reasonable employee from making or supporting a similar complaint of discrimination.

145. As a result of Defendant's unlawful conduct in violation of the NYCHRL, Plaintiff suffered economic loss, for which Plaintiff is entitled to an award of monetary damages and other relief.

146. As a result of the unlawful conduct of the Defendant's in violation of NYCHRL, Plaintiff has suffered, and continues to suffer, severe mental anguish and emotional distress, including, but not limited to depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence, and emotional pain and suffering, for which Plaintiff is entitled to an award of monetary damages and other relief.

147. The unlawful discriminatory actions of Defendant constitute malicious, willful, and wanton violations of NYCHRL, for which Plaintiff is entitled to the maximum allowable damages under this statute and an award of punitive damages.

NINTH CAUSE OF ACTION
FAILURE TO ACCOMMODATE UNDER THE ADA

148. Plaintiff incorporates by reference the preceding paragraphs as alleged above.

149. The ADA requires an employer to engage in an interactive process following a request for reasonable accommodation.

150. Defendant failed to engage in the interactive process initiated by Plaintiff for her documented disability of anxiety and migraines in direct violation of the ADA. Defendant discriminated against Plaintiff by, *inter alia*, failing to provide reasonable accommodation for her disability, and refusing to allow her access to even their inadequate alternative to her requested accommodation.

151. Defendant acted in a willful and wanton manner and in callous disregard for Plaintiff's federally protected rights and physical well-being.

152. As a direct and proximate result of Defendant's discriminatory conduct, Plaintiff has suffered and will continue to suffer considerable injury, including but not limited to loss of substantial past and future salary and income, mental anguish, emotional distress, humiliation, and other compensable damages unless and until this Court grants relief.

153. Plaintiff requests relief as hereinafter described.

TENTH CAUSE OF ACTION
RETALIATION WITH RIGHTS UNDER THE FMLA

154. Plaintiff hereby repeats and realleges each and every allegation in the preceding paragraphs as if set forth fully herein.

155. The FMLA provides that, "it shall be unlawful for any employer to interfere with, restrain, or deny the exercise of or the attempt to exercise any right provided under this subchapter." 29 U.S.C. §2611 (A)(1).

156. At all times relevant, Plaintiff was eligible for the FMLA's protection in that she met the definition of an eligible employee under the FMLA and had a close relative with a serious health condition, pneumonia, qualifying under the FMLA.

157. At all times relevant, Defendant was an employer covered under FMLA.

158. At all times relevant, Plaintiff was entitled to utilize such family leave under the FMLA.

159. Despite her eligibility to utilize such medical leave pursuant to the FMLA, Defendant deprived Plaintiff of her FMLA rights beginning in September of 2024 and subjected Plaintiff to retaliation, namely, preventing her from returning to work and explicitly reducing her annual bonus as a result of utilizing such FMLA leave.

160. By the actions described above, Defendant unlawfully retaliated against Plaintiff for exercising her FMLA rights.

161. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered and continues to suffer, monetary and/or economic harm for which he is entitled to an award of damages, in addition to reasonable attorneys' fees and costs.

162. Defendant's unlawful actions constitute reckless intentional, malicious, willful and wanton violations of the FMLA.

JURY DEMAND

163. Plaintiff hereby demands a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests a judgment against the Defendant:

A. Declaring that Defendant engaged in unlawful employment practices prohibited by Title VII, Section 1981, the ADA, FMLA, the NYSHRL, and the NYCHRL in that Defendant discriminated against Plaintiff on the basis of her sex/gender and race, retaliated against Plaintiff on account of her complaints of discrimination, failed to accommodate her disability and retaliated against her due to her use of FMLA leave;

B. Awarding damages to Plaintiff for all lost wages and benefits resulting from

Defendant's unlawful discrimination 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 injury, distress, pain and suffering and injury to her reputation in an amount to be proven;

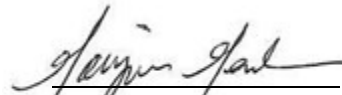
D. Awarding Plaintiff punitive damages;

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

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

Dated: September 8, 2025
Bellport, New York

MESIDOR PLLC



Marjorie Mesidor
30 Station Road, Suite 5
Bellport, NY 11713
212-930-6010
mm@marjoriemesidor.com
Attorneys for Plaintiff