

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: _____ Agency(ies) Charge No(s): _____ <input checked="" type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
_____ New York State Division of Human Rights _____ and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Mrs. Paris V. Rious		Home Phone (Incl. Area Code) <div style="background-color: black; width: 100px; height: 20px;"></div>	Date of Birth Click here to enter text.
Street Address <div style="background-color: black; width: 200px; height: 20px;"></div>		City, State and ZIP Code <div style="background-color: black; width: 150px; height: 20px;"></div>	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name The City of New York		No. Employees, Members 500+	Phone No. (Include Area Code)
Street Address Click here to enter text.		City, State and ZIP Code	
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input checked="" type="checkbox"/> OTHER (Specify) Hostile Work Environment		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest July 2022 present CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
<p>Claimant PARIS V. RIOUS alleges that she's employed with the Police Department City of New York assigned to the 23rd Precinct.</p> <p>Claimant PARIS V. RIOUS alleges that sometime in Summer 2021, she became the primary caregiver for her mother who's experiencing a number of chronic medical conditions.</p> <p>Claimant PARIS V. RIOUS alleges that at the time, she was assigned as the Training Officer, 23rd Precinct.</p> <p>Claimant PARIS V. RIOUS alleges that throughout this time period, she would use her time off and vacation time to care for her mother.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY - When necessary for State and Local Agency Requirements <div style="text-align: center;"> 12.09.2023 </div> I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT <div style="text-align: center;"> WESTCHESTER COUNTY SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) 02SA0013820 EXP 09.26.2023 </div>	
<div style="display: flex; justify-content: space-between;"> 12/9/23 </div> <div style="display: flex; justify-content: space-between; font-size: small;"> Date Charging Party Signature </div>			

CHARGE OF DISCRIMINATION

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FEPA



EEOC

New York State Division of Human Rights

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Claimant alleges that the Commanding Officer Deputy Inspector Scott Callahan; Administrative Lieutenant Tahira P. Jackson and Training Sergeant Raoul O. Fray knew about her being the primary caregiver for her mother and the mental, physical and logistical challenges of accomplishing that while employed.

Claimant alleges that Commanding Officer Deputy Inspector Scott Callahan; Administrative Lieutenant Tahira P. Jackson and Training Sergeant Raoul O. Fray as supervisors are aware of department services that could explain programs or laws to assist with the caregiver process but, did not refer her or offer any assistance.

Claimant PARIS V. RIOUS alleges that in July 2022, she experienced a medical condition and after consultation with a department surgeon, she was placed on restricted duty.

Claimant PARIS V. RIOUS alleges that shortly thereafter, she was transferred to Queens South Narcotics instead of being retained in her permanent command.

Claimant PARIS V. RIOUS alleges that since the training officer position is administrative, she could've continued performing her regular duties during recovery.

Claimant PARIS V. RIOUS alleges that in August 2022, she was transferred back to the 23rd Precinct.

Claimant PARIS V. RIOUS alleges that in September 2022, she felt unwell and reported to the Medical Division.

Claimant PARIS V. RIOUS alleges that she met with Department Surgeon Leon Eisikowitz.

Claimant PARIS V. RIOUS alleges that she discussed the mental, physical and logistical challenges of being the primary caregiver for her mother while employed.

Claimant PARIS V. RIOUS alleges that instead of Department Surgeon Leon Eisikowitz referring her to other department services that could explain programs or laws to assist with the caregiver process, he referred her to Psychological Services.

Claimant PARIS V. RIOUS alleges that there was no clinical or diagnostical reason to refer her to Psychological Services.

Claimant PARIS V. RIOUS alleges that shortly thereafter, she met with someone from Psychological Services. The department psychologist immediately determined she was psychologically fit as a police officer and is only experiencing the mental, physical and logistical challenges of being the primary caregiver for her mother while employed as other similarly situated individuals.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

12/9/23

Date

P. R.

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

WESTCHESTER COUNTY
SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

02SA0013820 EXP. 09.26.2027

Claimant PARIS V. RIOUS alleges that shortly thereafter, she returned to her command.

Claimant PARIS V. RIOUS alleges that shortly thereafter, she met with Training Sergeant Raoul O. Fray.

Claimant PARIS V. RIOUS alleges that he told her that Administrative Lieutenant Tahira P. Jackson was going to change her days off from Friday and Saturday.

Claimant PARIS V. RIOUS alleges that Commanding Officer Deputy Inspector Scott Callahan; Administrative Lieutenant Tahira P. Jackson and Training Sergeant Raoul O. Fray knew that she was the primary caregiver for her mother and a change in schedule would create a substantial hardship for them.

Claimant PARIS V. RIOUS alleges that they did not care.

Claimant PARIS V. RIOUS alleges that Training Sergeant Raoul O. Fray then told her, "Your new days off are Sunday and Monday."

Claimant PARIS V. RIOUS alleges that Commanding Officer Deputy Inspector Scott Callahan; Administrative Lieutenant Tahira P. Jackson and Training Sergeant Raoul O. Fray intentionally changed her days off in a not so-veiled tactic to force her out of the training unit.

Claimant PARIS V. RIOUS alleges that Commanding Officer Deputy Inspector Scott Callahan; Administrative Lieutenant Tahira P. Jackson and Training Sergeant Raoul O. Fray did not report this not so-veiled tactic to the Office of Equity and Inclusion as required by department policy. i.e. disability discrimination [caregiver status] and related claims.

Claimant PARIS V. RIOUS alleges that in September 2022, after some research she applied to use her legal rights under the Family Medical Leave Act [FMLA]. The application was forwarded to the Medical Division, Family and Medical Leave Act Unit.

Claimant PARIS V. RIOUS alleges that ironically, it's the same Medical Division Department Surgeon Leon Eisikowitz is assigned but, never referred her.

Claimant PARIS V. RIOUS alleges that on or about October 22, 2022, her application was approved with the following conditions: Certified 1 – 3 times per month, 1 -2 days per episode.

Claimant PARIS V. RIOUS alleges that shortly thereafter she began to use her FMLA rights within the approved department guidelines which made things more manageable for she and her mother.

Claimant PARIS V. RIOUS alleges that in or around December 31, 2022, she had a conversation with Training Sergeant Raoul O. Fray.

Claimant PARIS V. RIOUS alleges that she informed him that her mother did not have caregiving coverage; therefore, she decided to use her legal rights under FMLA to care for her.

Claimant PARIS V. RIOUS alleges that Training Sergeant Raoul O. Fray accused her of malingering.

Claimant PARIS V. RIOUS alleges that Training Sergeant Raoul O. Fray did not self-report this not so-veiled tactic to the Office of Equity and Inclusion as required by department policy. i.e. disability discrimination [caregiver status] and related claims.

Claimant PARIS V. RIOUS alleges that she felt offended by his lack of empathy.

Claimant PARIS V. RIOUS alleges that in January 2023, she met with Administrative Lieutenant Tahira P. Jackson.

Claimant PARIS V. RIOUS alleges that during the conversation, Administrative Lieutenant Tahira P. Jackson told her that she needs to give advance notice.

Claimant PARIS V. RIOUS alleges that she told Administrative Lieutenant Tahira P. Jackson, due to the chronic nature of her mother's medical condition, at times, she has to leave at moment's notice.

Claimant PARIS V. RIOUS alleges that Administrative Lieutenant Tahira P. Jackson did not self-report this not so-veiled tactic to the Office of Equity and Inclusion as required by department policy. i.e. disability discrimination [caregiver status] and related claims.

Claimant PARIS V. RIOUS alleges that she felt offended by her lack of empathy.

Claimant PARIS V. RIOUS alleges that shortly thereafter she continued to use her FMLA rights within the approved department guidelines which made things more manageable for she and her mother.

Claimant PARIS V. RIOUS alleges that on or about September 19, 2023, an hour before the end of her tour Administrative Lieutenant Tahira P. Jackson changed her assignment to All Out, which interfered with her caregiver duties.

Claimant PARIS V. RIOUS alleges that Administrative Lieutenant Tahira P. Jackson intentionally changed her assignment knowing that such change would interfere with her caregiving responsibilities.

Claimant PARIS V. RIOUS alleges that Administrative Lieutenant Tahira P. Jackson intentionally changed her assignment favoring Commanding Officer Scott Callahan's friend Police Officer William R. Grawunder who was initially assigned to All Out over her FMLA rights and caregiving responsibilities.

Claimant PARIS V. RIOUS alleges that Administrative Lieutenant Tahira P. Jackson did not self-report this not so-veiled tactic to the Office of Equity and Inclusion as required by department policy. i.e. disability discrimination [caregiver status] and related claims.

Claimant PARIS V. RIOUS alleges that on or about September 24, 2023, she was told by Administrative Lieutenant Tahira P. Jackson that "The CO [Deputy Inspector Scott Callahan] was making changes" and that she was transferred from the Training Unit to Patrol Squad B1.

Claimant PARIS V. RIOUS alleges that throughout this entire time period [Summer 2021 – present], although she was treated less favorably than other police officers requiring various leaves, she did not file complaints with the Office of Equity and Inclusion alleging disability discrimination, FMLA retaliation and related legal claims because the department does not take complaints seriously and she's afraid of retaliation.

Claimant alleges that Respondent THE CITY OF NEW YORK through LEON EISIKOWITZ; SCOTT CALLAHAN; TAHIRA P. JACKSON and RAOUL O. FRAY violated her legal rights as a caregiver under the ADA, FMLA retaliation and related legal claims.