

E-File for Attorneys Information

EEOC Charge Number: 520-2025-01872

Date: 12/21/2024

Verified Path

Receiving Office: New York District Office

Attorney Information

Name: Eric Sanders Esq.

Pronouns:

Address: 30 wall street 8th Fl

New York, NY 10005

Email Address: [REDACTED]

Primary Phone: 212-652-2782

Secondary Phone:

Fax:

Language Needs:

Disability Needs:

Bar Number: 4238382

Bar Jurisdiction: NY

Client Information

Name: Ms. Quatisha Epps

Pronouns:

Address: [REDACTED]

Email Address: [REDACTED]

Primary Phone: [REDACTED]

Secondary Phone:

Date of Birth: [REDACTED]

Gender: Female

Disability: No

Hispanic or Latino: No

Race: Black or African American

Ethnicity/National Origin Group: Unavailable

Ethnicity/National Origin: Unable to Obtain Information from Charging Party

Language Needs: N/A

Disability Needs: N/A

Respondent Information

Name: The City of New York

Address: Police Department City of New York One Police Plaza

New York, NY 10038, UNITED STATES OF AMERICA

Primary Phone: 646-610-5000

Fax:

Institution Type: County/City/Local Govt. Agency

Number of Employees: 501+ Employees

North American Industry Classification System (NAICS) Code: 922120

Tax Identification Number:

Service Address: One Police Plaza, New York, NY, 10038

Allegation Information

Allegations: Sex

Additional Information

Class: Yes

[REDACTED]

Policy: I dont know

Related Inquiries/Charge: No

Related Lawsuit: No

Requested Immediate Notice of Right to Sue: No

Requested Mediation: Yes

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
E-FILE FOR ATTORNEYS**

RE: EEOC Charge No. 520-2025-01872

1. I acknowledge that I am submitting a charge of discrimination with the EEOC on behalf of Ms. Quatisha Epps against The City of New York.
2. I acknowledge that the EEOC is required to serve notice of the charge on The City of New York, and that the notice may include Ms. Quatisha Epps's name or other identifying information.
3. I certify that (1) I am an attorney licensed to practice law, (2) I represent Ms. Quatisha Epps, (3) this client has authorized me to submit this charge, and (4) the information I am providing is true and correct to the best of my knowledge.

Signature

Eric Sanders

Eric Sanders Esq.

Date

12/21/2024

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):

- FEPA
- EEOC

New York State Division of Human Rights and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Ms. Quathisha Epps

Home Phone (Incl. Area Code)

Date of Birth

Street Address

City, State and ZIP Code

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

City, State and ZIP Code

Click here to enter text.

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

- RACE
- COLOR
- SEX
- RELIGION
- NATIONAL ORIGIN
- RETALIATION
- AGE
- DISABILITY
- GENETIC INFORMATION
- OTHER (Specify) **HOSTILE WORK ENVIRONMENT**

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

06/01/2023

present

CONTINUING ACTION

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

Claimant Quathisha Epps alleges that between June 2023 and December 16, 2024, Chief of Department Jeffrey B. Maddrey engaged in quid pro quo sexual harassment by exploiting her emotional and financial vulnerabilities, as well as her history of childhood trauma, to coerce her into performing unwanted sexual favors in exchange for overtime opportunities in the workplace. Chief Maddrey also instructed her to "take care" of another female officer, a survivor of domestic violence, to subject that officer to unwanted sexual advances and conduct, including sexual intercourse, within the workplace. Additionally, Chief Maddrey maintained an inappropriate sexual relationship with another female detective in the office and subjected Claimant Epps to further sexually offensive conduct in person and through her cellular phone.

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

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

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

12.21.2024

Date

Quathisha Epps

Charging Party Signature

Quathisha Epps 12.21.2024

WST 025A0013820

CHARGE OF DISCRIMINATION

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Charge Presented To: Agency(ies) Charge No(s):

- 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)):

In October 2024, when Claimant Epps finally developed the courage to reject Chief Maddrey's advances, he retaliated against her by orchestrating an intentionally manipulated Monthly Overtime Report through First Deputy Commissioner Tania Kinsella and Lieutenant Leslie A. Trenor to falsely portray her as an abuser of overtime. Meanwhile, the Monthly Overtime Report was intentionally manipulated to hide the true number of overtime abusers throughout the department throughout former Police Commissioner Edward A. Caban's administration and the current administration, especially in the offices of the First Deputy Commissioner, Deputy Commissioner of Operations Kaz R. Daughtry, Chief of Department, Chief of Patrol John M. Chell and others.

Shortly thereafter, a criminal and internal investigation was opened against her as further retaliation.

Chief Maddrey also burdened Claimant Epps financially, granting her overtime but demanding monetary compensation in return, including requiring her to fund a trip to Miami for him and his wife. The systemic failures within the NYPD allowed Chief Maddrey's predatory behavior to continue unchecked, culminating in his promotion to the department's highest uniform position by Mayor Eric L. Adams, despite a well-documented history of misconduct and abuse of power.

Claimant Epps alleges that on December 16, 2024, overwhelmed by the public portrayal of her as an overtime abuser, she contemplated vesting out of the NYPD. During this time, Chief Maddrey met with her in her office and stated that he would speak to Police Commissioner Jessica Tisch on her behalf but first demanded that she "kiss it," referring to his penis. Claimant Epps, feeling she had no choice, complied under coercion. Immediately afterward, she filed her application for a Vested Interest Retirement Pension with the New York City Police Pension Fund, marking the culmination of the severe emotional and professional harm inflicted upon her by Chief Maddrey's abuse of power.

In response, on December 18, 2024, under the authority of Police Commissioner Jessica Tisch, the department initiated actions against Claimant Epps as part of an alleged "overtime" investigation. This action further compounded the retaliation and harm she experienced after filing for a Vested Interest Retirement Pension and her coerced compliance with Chief Maddrey's inappropriate demand. This investigation is part of a continued pattern of retaliatory conduct designed to undermine her credibility and career.

The department has engaged in similar dilatory and retaliatory conduct toward other female employees who have alleged comparable misconduct by male supervisors in positions of power. This pattern demonstrates a systemic failure within the department to address and rectify complaints of sexual harassment and abuse of authority, further enabling a hostile work environment and perpetuating harm against female victims who come forward with allegations.

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.

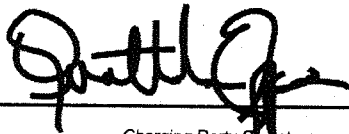
NOTARY - When necessary for State and Local Agency Requirements

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

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

12.21.2024



 12.21.2024

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

Date

Charging Party Signature

WEST. 025A0013820