

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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VLADIMIR RAVICH,

Plaintiff,

-against-

Index No.: 161574/2025

THE CITY OF NEW YORK, et al.

Defendants

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AFFIDAVIT OF DEPUTY CHIEF WINSTON M. FAISON

STATE OF NEW YORK) ss:

COUNTY OF KINGS)

I, **WINSTON M. FAISON**, being duly sworn, deposes and says:

1. I am a retired NYPD Deputy Chief and the former Commanding Officer of the Aviation Unit. I make this affidavit because I was informed that a motion was filed asking the Court to remove my attorney, Eric Sanders, Esq.

2. I want the Court to understand that I have not seen the Order to Show Cause, the supporting papers, or any of the attached emails or documents. I learned about the motion only because Mr. Sanders told me it had been filed.

3. Mr. Sanders also told me that he could not show me the papers because they included emails from a brief, past communication he once had with Mr. Ravich. I respected that immediately. Mr. Sanders has always been careful and transparent with me, and I have never had any reason to doubt his judgment.

4. Before I retained him, Mr. Sanders told me directly that months earlier Mr. Ravich had contacted his office for a short intake discussion and sent a brief email. He told me no attorney–client relationship was formed and that he later destroyed the materials. Hearing that, I did not see any issue. It had nothing to do with me or the situation I was facing in the Aviation Unit.

5. Mr. Sanders further explained that if any lawsuit was ever filed against me because of my work in the NYPD, I would still have to follow the normal NYPD procedure, including submitting a Request for Legal Assistance to the Legal Bureau and cooperating with the City if they provided representation. He made clear that this process was separate from anything involving his firm. I appreciated that clarity and honesty.

6. At no time has Mr. Sanders ever discussed anything about Mr. Ravich’s situation with me. He has never shown me any emails, documents, or details that came from Mr. Ravich. All I know is what he explained in broad terms — that there had been a brief intake contact and nothing more.

7. What I am dealing with inside the Aviation Unit is something very different. For the past year, I have been the target of a coordinated effort to undermine my leadership, damage my name, and erase my accomplishments as the first Black Commanding Officer of the Unit. Articles, anonymous leaks, false accusations — they have all taken a toll on me professionally and personally.

8. I have served the NYPD for decades with pride. I earned every promotion. I brought credentials, experience, and integrity to the Aviation Unit. Yet I have been treated as if none of that mattered. The smear campaign against me has been painful, humiliating, and isolating. My reputation, my career, and my family have all been affected.

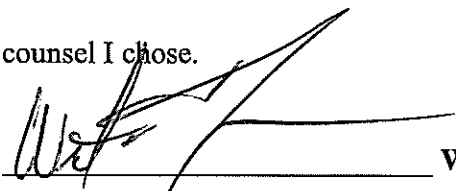
9. When I finally reached the point where I needed legal help, I chose Mr. Sanders because he understood what I was going through. He has experience dealing with coordinated attacks on Black officers, and he has stood up to these kinds of tactics before. I hired him because I trusted him to help me protect my name and navigate what has become an overwhelming situation.

10. The idea that he should now be removed because of a single short intake call he had with someone else months before — about a matter that had nothing to do with me — feels like an extension of the same pressure and intimidation I have been facing all along.

11. I want the Court to know that losing Mr. Sanders as counsel would harm me. I have been dealing with months of leaks, false narratives, and personal attacks. Having to replace the attorney who has helped me stay grounded through all of this would set me back and leave me even more vulnerable.

12. I simply want the chance to defend myself, protect my name, and address the issues that have been raised about my leadership in the Aviation Unit. I trust Mr. Sanders to help me do that. I want him to continue representing me.

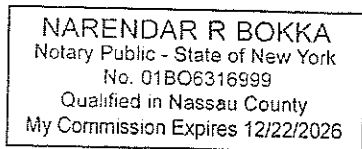
13. I respectfully ask the Court to deny the motion and allow me to remain with the counsel I chose.



WINSTON M. FAISON

Sworn to before me this 17th day of November, 2025

Narendar R. Bokka Notary Public



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**AFFIDAVIT OF DEPUTY CHIEF WINSTON M. FAISON IN OPPOSITION TO
PLAINTIFF'S ORDER TO SHOW CAUSE TO DISQUALIFY COUNSEL**

Duly submitted by:

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