

Make the Road New York
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CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

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In the Matter of the Complaint of:

SECOND AMENDED
VERIFIED COMPLAINT

MAKE THE ROAD NEW YORK, IRIS VEGA,
VICTOR SANCHEZ, AURA CRUZ, and
MARIA APARICIO,

Case No. M-P-N-17-27554

Complainants,

-against-

NEW YORK CITY POLICE DEPARTMENT

Respondent.

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On September 8, 2017, Complainants filed their initial complaint. Complainants filed an amended complaint on August 13, 2018. We hereby amend the present Complaint to add Maria Aparicio as an individual complainant:

Organizational Complainant **Make the Road New York**, and Individual Complainants **Iris Vega, Victor Sanchez, Aura Cruz, and Maria Aparicio**, through their attorney Make the Road New York, respectfully allege the following:

PRELIMINARY STATEMENT

1. This Complaint is brought by Make the Road New York as an organization complainant, and by five limited English proficient (“LEP”) New Yorkers, on behalf of themselves and all others similarly situated, against the New York City Police Department (“NYPD”) for their pattern and practice of denying interpretation services to Complainants and other persons of foreign-born origin, which deprives them of critical access to NYPD services and unlawfully discriminates against them on the basis of their national origin.
2. Respondent failed to offer and provide interpretation services to Complainants seeking assistance from the police, directly violating New York City’s Language Access Executive Order (Executive Order 120), NYPD written policy and procedures as outlined in the NYPD Patrol Guide, and the New York City Human Rights Law (“NYCHRL”). Interpretation services were denied when Complainants attempted to report crimes and had made repeated requests for interpretation services. The NYPD’s refusal to provide interpretation deprived LEP Complainants of the opportunity to communicate effectively with the police and to receive protection and assistance from the NYPD.
3. As a public accommodation under the NYCHRL, the NYPD is liable for their pattern and practice of failing to provide services and protections to LEP immigrant New Yorkers.

PARTIES

Organizational Complainant

4. Complainant Make the Road New York (“MRNY”) is a not-for-profit community-based membership organization with over 22,000 members dedicated to building the power of

immigrant and working class communities to achieve dignity and justice through organizing, policy innovation, transformative education, and survival services.

Individual Complainants

5. Complainant Iris Vega is a Spanish-speaking woman of Latin American descent. Her designated address is c/o Make the Road New York, 92-10 Roosevelt Ave., Jackson Heights, NY 11372. She has limited English proficiency.
6. Complainant Victor Sanchez is a Spanish-speaking man of Latin American descent. His designated address is c/o Make the Road New York, 92-10 Roosevelt Ave., Jackson Heights, NY 11372. He has limited English proficiency.
7. Complainant Aura Cruz is a Spanish-speaking woman of Latin American descent. Her designated address is c/o Make the Road New York, 92-10 Roosevelt Ave., Jackson Heights, NY 11372. She has limited English proficiency.
8. Complainant Maria Aparicio is a Spanish-speaking woman of Latin American descent. Her designated address is c/o Make the Road New York, 92-10 Roosevelt Ave., Jackson Heights, NY 11372. She has limited English proficiency.
9. Complainants have not previously filed any other civil or administrative claims alleging an unlawful discriminatory practice with regard to the allegations of discrimination that are the subject of this complaint.

Respondent

10. Respondent New York City Police Department is a municipal agency of the City of New York responsible for law enforcement in New York City. Respondent NYPD's address

for service of process is c/o Legal Bureau, One Police Plaza, Room 1406, New York, NY 10038.

RELEVANT LAW

11. The New York City Human Rights Law (“NYCHRL”) prohibits discrimination based on national origin in public accommodations. N.Y.C. Admin. Code § 8-107(4).
12. The NYCHRL provides that it is an unlawful discriminatory practice for “any person who is the owner . . . agent or employee of any place or provider of public accommodation” to “refuse, withhold from or deny . . . the full and equal enjoyment, on equal terms and conditions, of any of the accommodations, services, facilities or privileges of the place or provider of public accommodation.” NYC Admin. Code § 8-107(4).
13. “Public accommodation” is defined to include “providers, whether licensed or unlicensed, of goods, services, facilities, accommodations, advantages or privileges of any kind.” NYC Admin. Code § 8-102(9). “Person” is defined to include “governmental bodies or agencies.” NYC Admin. Code § 8-102(1).
14. The NYPD is a governmental agency and public accommodation in New York City.
15. Discrimination against limited English proficient individuals constitutes discrimination based on national origin in violation of the NYCHRL § 8-107(4).

STATEMENT OF FACTS

NYPD’s Language Access Policy

16. In July 2008, Mayor Bloomberg issued Executive Order No. 120 (“EO 120”), “Citywide Policy on Language Access to Ensure the Effective Delivery of City Services,” which

requires that all New York City agencies that provide public services “ensure meaningful access to such services by taking reasonable steps to develop and implement agency-specific language assistance plans regarding LEP persons.” The Order includes instruction for City agencies to provide services in languages based on at least the top six LEP languages spoken by the New York City population.

17. The NYPD has recognized its obligation to ensure access to services and provide interpretation for LEP persons consistent with Executive Order 120. Its Language Access Plan (the “Plan”), published in April 2009, provides, “when performing law enforcement functions, members provide free language assistance to LEP individuals whom they encounter when necessary or whenever an LEP person requests language assistance services. It is the policy of this Department to inform members of the public that language assistance services are available free of charge to LEP persons.” In addition, the Plan states that officers are trained to obtain interpretation services when dealing with a LEP individual either via a Department interpreter or Language Line for phone interpretation.
18. Further, the NYPD’s internal Patrol Guide sets forth specific procedures for interacting with LEP persons. *See Guidelines for Interacting with Limited English Proficient Persons* (P.G. 212-90), effective Oct. 16, 2013 (stating, “Accurate interpretation/translation of foreign languages is important to providing police services”). Among the procedures outlined are the requirements for NYPD employees to determine the primary language of LEP persons, and to use the telephonic interpretation service or the Language Initiative Program (defined as a corps of interpreters who can be called to interpret or translate, and

comprised of employees who are foreign language proficient or certified interpreters) when interpretation services are necessary.

19. Despite these language access policies, as set forth below, the NYPD routinely denies interpretation services to Complainants and other persons of foreign-born origin who attempt to report crimes or otherwise communicate with the NYPD and deprives them of critical safety and protection services.
20. Finally, Make the Road New York sent a letter to the 110th Precinct on January 30, 2017, to report the NYPD's failure to provide interpretation and access to services for LEP individuals, specifically in the cases of Complainants Victor Sanchez and Iris Vega, and to request a briefing on their protocols for providing language access services to immigrant New Yorkers. The 110th Precinct did not respond to this letter.

Complainant MRNY

21. Since its inception in 2007, the Trans Immigrant Project ("TrIP") (formerly referred to as the PRYDE Committee) at MRNY, has supported transgender, gender nonconforming, intersex, queer ("TGNCIQ"), and limited English proficient ("LEP") community members who have encountered discrimination, hate violence and anti-immigrant sentiment in the borough of Queens.
22. Led by Bianey Garcia, MRNY's TGNCIQ Organizer, TrIP and MRNY staff have worked to ensure that local agencies, including the NYPD, provide translation and interpretation services to TGNCIQ individuals after recognizing a pattern of discriminatory treatment by the police in Jackson Heights and surrounding areas based on individuals' language ability.

23. MRNY staff regularly interact with community members who are victims of crimes, often hate crimes, and report experiencing language barriers when attempting to report such crimes and otherwise communicate with the NYPD, including Complainants Iris Vega, Victor Sanchez and Aura Cruz.
24. MRNY LGBTQ Organizer Bianey Garcia has routinely accompanied TriP (“Trans Immigrant Project” committee) members to NYPD precincts to provide support, assist in the filing of police reports and to help address any barriers MRNY community members encounter at the NYPD. Ms. Garcia has accompanied multiple LEP community members to different NYPD precincts in Queens over the past two years. Ms. Garcia has witnessed language barriers at these precincts on almost every occasion. NYPD officers or staff have routinely asked Ms. Garcia to provide interpretation for the NYPD to assist in the communication with community members when they are seeking NYPD services. *See Garcia Rebuttal Affidavit.*
25. Ms. Garcia has routinely communicated to the NYPD that it is *their* legal responsibility to provide interpretation services to community members who are LEP.
26. MRNY attorneys and advocates have also routinely responded to requests from MRNY community members facing language barriers when attempting to report crimes to the NYPD. MRNY staff have often spoken via telephone to community members facing language barriers, accompanied community members to NYPD precincts, or encouraged community members to return to the precinct to request interpretation services.
27. On November 9, 2016, a MRNY attorney and organizer, as part of the LGBT liaison committee, attended a meeting at One Police Plaza with Commissioner O’Neil during which the issue of language access services was raised. MRNY staff was told that lack of

language access services was unacceptable and they would change their practices.

However, MRNY and the community members we serve have continued to experience routine language barriers with the NYPD despite these promises..

28. LEP community members of MRNY have continued to face systemic barriers to services at the NYPD. As this Complaints evidences, LEP community members have faced systemic barriers to accessing NYPD services and such barriers have led to the routine expenditure of resources by MRNY to support community members denied services.

29. Indeed, such a denial of services has occurred as recently as May 2018 when Ms. Garcia had to drop all of her duties to accompany a community member to the NYPD after a denial of interpretation services. *See Garcia Supplemental Affidavit.*

Complainant Iris Vega

30. Complainant Iris Vega was employed by [REDACTED] Sports Bar (“[REDACTED]”) as a dancer from approximately May 2014 until September 12, 2016.

31. [REDACTED] is located at [REDACTED]

32. Around 3 a.m. on Monday September 12, 2016 at [REDACTED], Ms. Vega’s manager [REDACTED] ordered Ms. Vega to drink a beer with him and told her he wanted to have sex with her. Ms. Vega repeated no, and Mr. [REDACTED] attacked and physically assaulted her, causing bruising and scratches to Ms. Vega’s neck, arm and hand. Ms. Vega continued to resist him.

33. Mr. [REDACTED] then grabbed an empty glass beer bottle and raised it up to his head as if he was going to hit Ms. Vega. A customer nearby stopped Mr. [REDACTED] from hitting her with the beer bottle.

34. Ms. Vega was terrified of what Mr. [REDACTED] would do next and she called 911. In Spanish, she asked the person who received the call to send someone who spoke Spanish.
35. Another manager at [REDACTED], who upon information and belief, is named [REDACTED], told Ms. Vega not to start problems by calling the police. The manager called the owner of the bar, [REDACTED], and handed the phone to Ms. Vega. Mr. [REDACTED] told Ms. Vega that she was fired and she should not have gotten the police involved in his business.
36. When the police arrived, Mr. [REDACTED] had already left. When the police approached Ms. Vega, Ms. Vega attempted to tell the police officer what had happened, but the police did not understand her. Ms. Vega asked in Spanish, "hablan español?" (which means, does anyone speak Spanish?). The officer signaled to her that they would be back.
37. Two different officers returned shortly afterwards. Ms. Vega asked the officers in Spanish, "hablan español?" and told them that she needed to speak to someone in Spanish. They said that they did not speak Spanish and did not offer interpretation. The manager [REDACTED] approached them and spoke to the officers in English. Ms. Vega did not understand what they said.
38. Ms. Vega became increasingly upset and frustrated. A person standing outside the bar who Ms. Vega had never met before then approached her and offered to interpret for her. As Ms. Vega was attempting to explain through the individual interpreting to the police officer how Mr. [REDACTED] had attacked her, the manager told the individual in Spanish that he was not there for the incident and should not get involved. The individual appeared intimidated and left. Ms. Vega had not yet finished explaining to the police what had happened. She tried to tell the officer to review video footage of the bar area because it

would show the attack, but he did not understand her when she was speaking in Spanish.

She did not see the officer take any notes or write a report.

39. The officer wrote his name, "P.O. Leonard," and the 115th Precinct on a napkin and told Ms. Vega to go there on Tuesday.

40. Ms. Vega went to the 115th Precinct on Tuesday, September 13, 2016, and an officer told her in Spanish that her case was assigned to the 110th Precinct and provided her with a phone number for the 110th Precinct: (718) 476-9311.

41. Ms. Vega then went to the 110th Precinct. She asked in Spanish what was happening with her case. The officer said something in English that she did not understand. No one at the Precinct offered her interpretation. Ms. Vega left.

42. Several days later, on or around the morning of September 19, 2016, Ms. Vega heard that the manager [REDACTED] had returned to [REDACTED] so she called 911 in Spanish again to report that he was at the bar.

43. Ms. Vega then went to [REDACTED]. When the police arrived, Ms. Vega identified Mr. [REDACTED] to the police officers as the person who attacked her, and he was arrested. An officer told Ms. Vega in Spanish that someone would call her the next day to follow up on the case.

44. Ms. Vega did not receive a call the next day, so she went to the 110th Precinct to follow up. An officer at the front of the Precinct told Ms. Vega, "no Spanish." Ms. Vega left the Precinct at that point.

45. Ms. Vega returned to the 110th Precinct approximately two days later, on or around September 22, 2016 at 1 p.m. Just as before, after waiting for about a half hour, she tried to speak with an officer, but none of the officers spoke Spanish or offered any Spanish

interpretation and so she was unable to communicate with them. A member of the public at the Precinct saw Ms. Vega struggling to communicate and offered to help interpret for her. Investigator Perez, who did not speak Spanish, gave Ms. Vega his card with his phone number. He told Ms. Vega in English that she should go to the criminal court to get an Order of Protection.

46. Ms. Vega went to the criminal court the next day. The court clerk there told her that she could not get an Order of Protection because there were no charges against Mr. [REDACTED].

47. Ms. Vega returned to the 110th Precinct that same day and was told that they did not have any information and she should go back to criminal court.

48. Ms. Vega called the phone number for the 110th Precinct (which had been given to her by the 115th Precinct, (718) 476-9311) multiple times over the next few weeks and asked to speak to someone about her case. On several occasions, the individual or individuals who picked up the phone said, "no Spanish" and hung up.

49. Ms. Vega felt upset, frustrated and humiliated about how she was treated. She was afraid for her safety. She felt that the police would not help her because she is a Spanish-speaking Latina woman.

50. Ms. Vega had trouble eating and sleeping because she could not stop thinking about the assault. She woke up from nightmares of being attacked again. Ms. Vega was a victim of severe domestic violence by her ex-husband and subsequent partner, and this assault also brought up memories of past violence and affected her deeply.

51. Ms. Vega lives near [REDACTED] and she was terrified that she would see Mr. [REDACTED]. She was afraid that he would try to hurt her and her son for reporting him to the police. She

became increasingly anxious when the police refused to listen to her or provide any information on her case.

52. Ms. Vega saw that when English-speaking individuals sought assistance at the 110th Precinct, the officers would attend to them quickly. The limited English proficient speakers were directed to wait on a bench in the Precinct. Ms. Vega spoke to other Spanish-speaking individuals who had been waiting at the Precinct for over an hour.

53. Several weeks later, around October 18, 2016, Ms. Vega sought out assistance at the community organization Make the Road New York ("MRNY"). Ms. Vega and representatives from MRNY called the 110th Precinct and were unable to confirm the disposition of the case against Mr. [REDACTED]. Around November 14, 2016, a representative from MRNY was told by Sergeant Figliuolo that Ms. Vega could go to the 110th Precinct to file a report.

54. On November 15, 2016, a staff member from MRNY accompanied Ms. Vega to the 110th Precinct to report the assault. Ms. Vega met with two Spanish-speaking officers in the domestic violence unit. They asked Ms. Vega questions about her job at the bar. When she told them that she was a dancer, they asked her if she knew that what she was doing was illegal. When Ms. Vega told them that [REDACTED] had been arrested, they did not believe her and asked for proof. Ms. Vega showed them a photograph she had taken on her phone of him getting arrested on September 19, 2016. The way the detectives interrogated Ms. Vega made her feel attacked and upset.

55. Ms. Vega was finally issued an Order of Protection by the Queens County Criminal Court on or around December 2, 2016, almost three months after she was assaulted. She does not believe she would have been able to get any information on her case, file an

accurate report with the NYPD or ultimately secure the Order of Protection without help from an English-speaking attorney at Make the Road NY.

Complainant Victor Sanchez

56. On or about July 2016, Victor Sanchez and his partner, [REDACTED] Garcia, began to lease a room located at [REDACTED].
57. Mr. Sanchez and his partner rented the room from a couple who were, upon information and belief, the lessees: Ms. [REDACTED] and [REDACTED], and their two children.
58. In December 2016, Ms. [REDACTED] built a room within the living room space. Mr. Sanchez and his partner had the right to use the common living room but Ms. [REDACTED] told Mr. Sanchez that her brother, [REDACTED], was coming in to live with them. When Mr. Sanchez asked her why, Ms. [REDACTED] just told him that [REDACTED] was heading down the wrong path (in Spanish, "anda en malos pasos").
59. On occasion, Mr. Sanchez likes to go dressed as a woman to clubs. The first week that [REDACTED] started to live in the space they were renting, around 3 a.m., Mr. Sanchez was returning home from a club dressed as a woman.
60. When Mr. Sanchez was walking into their apartment, Romulo was coming out of the bathroom. When [REDACTED] saw Mr. Sanchez, he went directly to wake up his sister, Ms. [REDACTED], and told her in Spanish that "the guys are letting faggots in" (in Spanish, "los muchachos están haciendo entrar maricones"). Ms. [REDACTED] then came in to Mr. Sanchez's door, and started knocking on the door insistently, asking in Spanish, "who's there with you?" Mr. Sanchez opened the door and told her that he was alone, that her brother was wrong, and that he was going to sleep because he was tired.

61. Up until that moment, Mr. Sanchez assumed Ms. [REDACTED] and Mr. [REDACTED] knew that Mr. Sanchez and his partner were a gay couple because Mr. Sanchez and his partner had a single bedroom, so they thought it was implied.
62. The next day, Ms. [REDACTED] was cooking and Mr. Sanchez told her in Spanish that the term her brother had used when referring to Mr. Sanchez and his partner was not polite, that they should not be called faggots and that they were a partnered couple. Ms. [REDACTED] asked Mr. Sanchez for the reason they had not introduced themselves as a gay couple, and Mr. Sanchez told her that it was a personal issue. Ms. [REDACTED] shrugged with disapproval and said, "whatever" (in Spanish, "ni modo").
63. From then onwards, [REDACTED] started saying loud enough so that Mr. Sanchez could hear, "we cannot go into the kitchen because the faggots are cooking," or "the girls are cooking," or "the little whore is in the kitchen" (in Spanish, "el putito está en la cocina"). [REDACTED] said those insults about three or more times around Mr. Sanchez.
64. On January 8, 2017, Mr. Sanchez woke up around 2 p.m. or 3 p.m. and his partner was still asleep. Mr. Sanchez went to the kitchen to prepare some food for him and his partner. [REDACTED] looked at Mr. Sanchez and yelled, in Spanish, "the faggot is cooking." Since it was the first time [REDACTED] said it to Mr. Sanchez's face, Mr. Sanchez told [REDACTED] that he needed to respect him because Mr. Sanchez had never insulted [REDACTED]. [REDACTED] then rushed towards Mr. Sanchez and said, "Let's go outside so we can fight" (in Spanish, "vamos afuera a darnos unos golpes"). Mr. Sanchez asked [REDACTED] if he was crazy, and in Spanish added, "I am not an animal and won't hit anyone." Then [REDACTED] responded, "I am going to smack the faggot out of you and make you a man" (in Spanish, "A punta de madrazos te voy quitar lo maricón y te voy a hacer hombrecito.")

65. Mr. Sanchez reached into his pocket to get his cellphone out to record [REDACTED]'s aggressive behavior. When [REDACTED] saw that Mr. Sanchez took the phone, he hit the cellphone away from Mr. Sanchez's hand, smacking Mr. Sanchez's phone to the floor.
66. [REDACTED] started to hit Mr. Sanchez. The first punch hit Mr. Sanchez on the side of his eyebrow. The second hit, on Mr. Sanchez's nose, he was knocked down, and hit the floor. Mr. Sanchez landed on his right elbow. Once on the floor, [REDACTED] kicked Mr. Sanchez two or three times with construction boots. Mr. Sanchez knows they were construction boots because he saw them while he was on the ground, and his partner works in construction.
67. At that point, Mr. Sanchez heard one of the kids start to scream. Mr. Sanchez's partner, Mr. Garcia, heard the scream, and ran to the kitchen where he tried to take [REDACTED] off of Mr. Sanchez. Mr. Sanchez told Mr. Garcia not to hit [REDACTED], in Spanish. "Grab my phone and record him, then he will stop hitting me," Mr. Sanchez told Mr. Garcia. Mr. Garcia was finally able to push [REDACTED] away from Mr. Sanchez. When Mr. Garcia started recording the encounter, [REDACTED] retreated and went into his sister's bedroom.
68. Mr. Sanchez and Mr. Garcia both went to their room where they called the police, via 911. Mr. Sanchez told the 911 operator what was going on. The emergency operator asked Mr. Sanchez if he required an ambulance because of the injuries he had suffered, and he said yes.
69. Around five minutes later, the police knocked on the front door of the apartment, and Ms. [REDACTED] started screaming near [REDACTED]'s bedroom and Mr. Sanchez heard [REDACTED] say to her, "Cry, so we will tell them that he (Mr. Sanchez) hit you."

70. Mr. Garcia opened the apartment's door, and the police officers came in. The police officers only spoke English. The officers saw Ms. [REDACTED] screaming.
71. The police told Mr. Garcia and Mr. Sanchez to go into their room until an officer came to interpret for them, in very rudimentary Spanish. The officers attended to Ms. [REDACTED] but since they did not speak Spanish, the officers kept all the parties separated. The police officers took a picture of Mr. Sanchez's face, and Mr. Sanchez told them that his foot was hurt but he does not remember if the officers took a picture of his foot.
72. Three to five minutes later, an officer who spoke Spanish came in at the same time the paramedics came in. The only thing that the officer asked Mr. Sanchez, in Spanish, was: "what happened?" Mr. Sanchez only had enough time to tell the officer that Ms. [REDACTED]'s brother had hit him repeatedly.
73. Then, Mr. Sanchez accepted the paramedics' offer to be transferred to the hospital due to his injuries. The ambulance took him to Elmhurst Hospital. The police did not come to the hospital to get the rest of the story, as Mr. Sanchez expected. However, a social worker came in and Mr. Sanchez explained everything that had happened. The social worker told Mr. Sanchez to go to the 110th Precinct to file a police report and get an Order of Protection.
74. Mr. Sanchez walked out of the hospital at approximately midnight, and went directly to the 110th Precinct with his partner, Mr. Garcia. Once there, the officer at the entrance, who was wearing a white shirt, told him to speak in English because there was no interpretation. Neither Mr. Sanchez nor Mr. Garcia speak English but they were able to understand that basic statement.

15. Another person who had come in to the Prisoner in the police report was able to suggest La Mía Sanchez. With this person suggesting, Mr. Sanchez told the officer in the witness that Mr. Sanchez was there to give his side of the story. The officer started by asking for his identification documents. Then the officer said to Mr. Sanchez, "The report is clear, why are you here?" Mr. Sanchez replied, "Because I was not asked for my version of what happened." Mr. Sanchez asserted that the witness of the facts had not been written down because he had not had the time to tell his version of the story before being taken to the hospital in the ambulance.
16. The officer in the witness called the officer who spoke Spanish and had responded at the apartment where the attack took place.
17. The police officer who spoke Spanish told Mr. Sanchez to go outside of the Prisoner with him. The officer was dressed as a civilian. Once out the witness asked, the officer asked Mr. Sanchez why he had gone to the Prisoner. Mr. Sanchez asserted that the hospital's medical worker told him to go to report his version of the incident.
18. The officer who spoke Spanish told Mr. Sanchez that Mr. [REDACTED] had reported that Mr. Sanchez had pushed her, and in response to pushing her [REDACTED] had pushed Mr. Sanchez. The report, the officer said, states that neither of women. Mr. Sanchez told him that Mr. [REDACTED] version of the story was a lie, and that he had not reached that. Mr. Sanchez then told him the facts of the attack as described above. The officer who spoke Spanish told Mr. Sanchez that they had had no time to take Mr. Sanchez's version of the story. Mr. Sanchez told him to look at the scars of his injuries, and that a simple push could not have provided those injuries. Then, the officer asked Mr. Sanchez what he

wanted to do and Mr. Sanchez told him, "I want to file a report." "Then let's go," the officer said.

79. When the officer, Mr. Sanchez, and Mr. Garcia walked back into the Precinct, the officer that was at the entrance of the Precinct, who wore a white shirt, told Mr. Sanchez and Mr. Garcia to get out and that he did not want to talk to Mr. Sanchez anymore. Mr. Sanchez and Mr. Garcia left because they were afraid to disobey him.

80. The officer who spoke Spanish, once outside the Precinct again, told Mr. Sanchez that Mr. Sanchez and Mr. Garcia should move away to a different apartment. "They are not your family," he said in Spanish, "that way you won't have any more issues," he added.

81. During the next three weeks, Mr. Sanchez and Mr. Garcia returned home only to sleep. Mr. Sanchez and Mr. Garcia showered and went to the bathroom in the house of friend, fearful that the people who lived with them would hurt them even more. They found a new room, after three weeks, for \$1,000, which was a lot more than Mr. Sanchez and Mr. Garcia used to pay but they needed to leave because they were fearful of being physically assaulted again.

82. On February 8, 2017, Mr. Sanchez came to Make the Road New York, where he met with Lorenzo Van Ness from the New York City Commission on Human Rights to inform him of the situation. Mr. Van Ness then connected Mr. Sanchez with Detective Espaillat, from the NYPD, who came to visit Mr. Sanchez at his new home and promised Mr. Sanchez that he would help Mr. Sanchez to file a report.

83. On or about March 29, 2017, Mr. Sanchez met with Detective Espaillat and another officer, who told Mr. Sanchez that he could make a report. They said that since there was no camera filming what had actually happened at the room where Mr. Sanchez and Mr.

Garcia lived, the NYPD had no alternative but to arrest [REDACTED] Ms. [REDACTED] and Mr. Sanchez, if Mr. Sanchez filed a report stating his complete version of the story. The officers wrote up a report, stating that there were no visible injuries to either party. This report contradicts Mr. Sanchez's medical records, which state the injuries that Mr. Sanchez sustained the night of the attack.

84. Mr. Sanchez wrote a general report by hand without describing the circumstances in detail. Mr. Sanchez knew that it was a partial description but he did not want to be arrested if he added more details.
85. A few days later, Detective Espaillat, called Mr. Sanchez to give him the report number: 2017-110-01756. To this day, Mr. Sanchez has not seen Ms. [REDACTED] and [REDACTED]'s report.
86. Advocates from MRNY advised Mr. Sanchez to call the Office of Victim Services ("OVS") to ask them to cover the hospital bill and get an Order of Protection against [REDACTED]. However, OVS told Mr. Sanchez that he did not qualify to receive help because Mr. Sanchez had chosen not to prosecute his aggressor. Mr. Sanchez told them that he could not prosecute his aggressor, not for lack of interest but because Mr. Sanchez was not able to file a complete report with the Precinct because they would not take Mr. Sanchez's report at first, and then later, because the officers with whom he met had told Mr. Sanchez not to give too many details or they would have to arrest him. OVS told Mr. Sanchez that since he had not followed up on his aggressor's arrest, despite his efforts to try to do so, they would not be able to help Mr. Sanchez in any case.
87. With the help of MRNY, and their LGBTQI Health organizer, Mr. Sanchez was able to get the hospital bill down to \$15, which he was able to pay. However, to this day Mr. Sanchez does not have an Order of Protection against his aggressor. Detective Espaillat

and the other NYPD officer who took his report told him that if [REDACTED] ever threatens Mr. Sanchez again, they would give him an Order of Protection. Mr. Sanchez feels defenseless from [REDACTED] attacking him again.

88. On April 27, 2017, Mr. Sanchez filed a discrimination case against his aggressor, [REDACTED], with the New York City Commission on Human Rights for the discriminatory attack against Mr. Sanchez because of his perceived gender identity and his sexual orientation.

Complainant Aura Cruz

89. Ms. Cruz was employed at [REDACTED] ("[REDACTED]"), located at [REDACTED] [REDACTED] from approximately July 2006 until December 15, 2016. Ms. Cruz was responsible for cleaning and killing the chickens, and assisting customers with their orders.

90. Around September 2016, a new employee named [REDACTED] began working at [REDACTED].

91. Soon after Mr. [REDACTED] began working at [REDACTED], he started making offensive sexual gestures towards Ms. Cruz. This behavior continued until Ms. Cruz's last day of work on December 15, 2016.

92. The employees at [REDACTED] changed into their work clothes in the basement of the store. Mr. [REDACTED] would go to the basement to change his clothes about ten minutes before Ms. Cruz, but he would still be undressed when Ms. Cruz arrived at the basement. He would wait for Ms. Cruz to walk down the stairs and stare at her while he stood in his underwear. He did this on an almost daily basis.

93. Mr. [REDACTED]'s actions made Ms. Cruz feel extremely uncomfortable, nervous, and scared for her safety.
94. On multiple occasions, Mr. [REDACTED] asked Ms. Cruz if she was married and if she would go to his house to have a drink with him. Ms. Cruz refused his advances and told Mr. [REDACTED] that she was married and did not want to go to his house.
95. One day on or around December 13, 2016, Ms. Cruz walked downstairs to the basement and saw Mr. [REDACTED] standing in his underwear and staring at her. He thrust his hips and penis towards her. Ms. Cruz asked why Mr. [REDACTED] was doing this and told him that he should treat her with respect. He said that he had not done anything.
96. About one day later, around 1 p.m., on December 14, 2016, Ms. Cruz was lifting packages of corn and asked Mr. [REDACTED] to help her because they were heavy. He told her that this was not his job and she could do it herself. Ms. Cruz felt frustrated, and told Mr. [REDACTED] that he was stupid and good for nothing. Mr. [REDACTED] became upset and told Ms. Cruz that he would tell the owner of the store that she yelled at him. He said that he would call the police (in Spanish, "echar la policia"). Ms. Cruz told him that she had not done anything wrong. She thought this was an empty threat. She did not believe that he would call the police because he had been the one been harassing her.
97. The next day, Thursday December 15, 2016, Ms. Cruz arrived at work around 8 a.m. Mr. [REDACTED] came into work around 9 a.m. and the police entered [REDACTED] immediately after him.
98. About three police officers called Ms. Cruz over to a space next to the office in the store. They told her in English that they needed to speak to her. Another police officer brought Mr. [REDACTED] to a different area of the store.

99. The police officer asked Ms. Cruz in English if she had threatened Mr. [REDACTED] with a knife. Ms. Cruz responded no.
100. Although Ms. Cruz understood some words in English, she could not understand most of what they said. Ms. Cruz asked the officers in English "someone speak Spanish?" They said that there was no one who spoke Spanish. Ms. Cruz told them in English that she needed someone who spoke Spanish because she does not speak English well. The police officer said that they did not have anyone who spoke Spanish. Ms. Cruz repeated that she needed help, even if on the telephone. They repeated that no one spoke Spanish. Then the officers brought Ms. Cruz to the basement and told her in English that they were going to arrest her and instructed her to change out of her work shoes.
101. Ms. Cruz repeated her request to speak to someone who spoke Spanish. The officers said that there was no one. Ms. Cruz took off the shoes she wore to work and put on her other shoes. The police put her hands behind her back and handcuffed her. A police officer held back Ms. Cruz's arm as he walked her up the stairs.
102. When the police put Ms. Cruz in the police car, she asked the officer sitting in the front of the car in English if there was someone who spoke Spanish. The officer said no.
103. Throughout this encounter and questioning by the police, Ms. Cruz was trying to explain that Mr. [REDACTED] had been sexually harassing her. She was not able to explain anything without Spanish interpretation.
104. Ms. Cruz felt extremely upset about how the police officers treated her. She felt frustrated that the police had asked her what happened, but would not provide interpretation so that she could respond.

105. Ms. Cruz felt humiliated and ashamed that she was arrested in front of her employer, customers and coworkers at her workplace. She felt confused and scared about why she was arrested when she had not done anything against the law.
106. The police officers brought Ms. Cruz to a holding cell at the 109th Precinct in Flushing, New York around 10:30 a.m. Ms. Cruz again requested to speak to someone who spoke Spanish.
107. About two hours later, a police officer who spoke Spanish came to Ms. Cruz's holding cell. He stood outside the cell and asked Ms. Cruz why she was arrested. She told him that they were accusing her of something she did not do. The officer said not to worry and that the Judge would let her go if she did not do it. Then he left. This conversation lasted under two minutes.
108. An officer took Ms. Cruz's fingerprints and Ms. Cruz was taken to a jail in Queens around 6 p.m. She was held there until about 10 p.m.
109. Ms. Cruz felt extremely scared and anxious about what would happen to her. She was afraid that the arrest could have immigration consequences and that no one would listen to the truth of what had happened.
110. The day after Ms. Cruz was arrested, the owner of [REDACTED], [REDACTED], called Ms. Cruz and asked her to come in to speak to him. Ms. Cruz met Mr. [REDACTED] outside of a pizzeria in front of [REDACTED]. and Mr. [REDACTED] told her that she was fired. Ms. Cruz asked an employee who worked at the pizzeria to interpret for her. She explained to Mr. [REDACTED] that Mr. [REDACTED] had been harassing her, and that he would take off his clothes and stand almost naked in front of her in the basement. Mr. [REDACTED] said that she should have told him earlier, but she was fired because he did not want problems.

111. Ms. Cruz felt upset and anxious after she was fired because she relied on her job to support her family. She had worked at [REDACTED] for over ten years, and had never received a warning or other disciplinary action. Ms. Cruz has not been able to find steady, full-time employment since she was terminated.
112. Ms. Cruz has diabetes and felt that the stress caused by her loss of employment caused her blood pressure to rise. On multiple occasions, she was not able to sleep because she could not stop thinking about how she had lost her job, had to pay a lawyer and go to court.
113. Ms. Cruz hired a criminal defense attorney to represent her. She had to pay him \$1,700 to defend her case. Ms. Cruz was required to appear in court multiple times, which caused her to feel anxiety and fear, particularly about potential immigration consequences and the presence of immigration officers.
114. On or around August 20, 2017, Ms. Cruz was attacked by individuals outside of her home. Another person nearby called the police to report the incident. The police from the 110th Precinct arrived and did not provide interpretation when speaking to Ms. Cruz. Ms. Cruz's nephew interpreted for Ms. Cruz.
115. Approximately two days later, around August 22 at 5 p.m., Ms. Cruz went to the 110th Precinct to sign a declaration in the case. Ms. Cruz approached about three officers standing outside the entrance to the Precinct and asked in Spanish if anyone spoke Spanish (in Spanish, "hablan español?"). The officers responded no. One of the officers then raised her voice and said, "¡aprende!", (which in English, means "learn it," instructing her to learn English).

116. Ms. Cruz felt embarrassed, upset and disrespected because she is Latina. She thought about turning around and going home. Ms. Cruz is hesitant to call the police because she doubts that she that will receive help and is afraid of how she will be treated, and she knows of several people in her community who feel the same.

Complainants Maria Aparicio

117. On or around October 2017, Maria Aparicio began leasing a room with her partner, [REDACTED] Mejia in a house located at [REDACTED].

118. Ms. Aparicio and Mr. Mejia rented the room from a woman who is, upon information and belief, the lessee: [REDACTED].

119. Upon information and belief, [REDACTED] also lives at [REDACTED] with her two adult daughters, [REDACTED] and [REDACTED]. [REDACTED]'s husband, [REDACTED] (last name unknown), and [REDACTED] and [REDACTED]'s four children.

120. Ms. Aparicio and Mr. Mejia rented and shared a small room behind the kitchen. Ms. [REDACTED] slept in one room, and Ms. [REDACTED], [REDACTED] and their children shared another room. [REDACTED] had a room to herself next to the bathroom. Everyone in the house lived on one floor and shared a large common area and kitchen.

121. Ms. [REDACTED]'s boyfriend during this time, [REDACTED] (also known as "Ezekiel"), regularly stayed with Ms. [REDACTED] and her family at [REDACTED]. Ms. [REDACTED] was often gone during the day and would not come home until late at night. Consequently, Mr. [REDACTED] would often be at the apartment when Ms. [REDACTED] was not there.

122. Starting on or around November 2017, Mr. [REDACTED] would routinely make sexual remarks about Ms. Aparicio's body when they would pass each other in the apartment. Sometimes when Ms. [REDACTED] was not in the apartment, he would ask Ms. Aparicio, in Spanish, when she was going to have sex with him ("¿Cuándo vas a coger conmigo?"). His comments made Ms. Aparicio feel extremely uncomfortable, particularly because Mr. [REDACTED] would often make these comments when they were alone in the apartment and when he was drinking heavily.
123. Ms. Aparicio wanted to move to another apartment and had even started saving up money so that she and Mr. Mejia could eventually move.
124. On the evening of March 14, 2018, Ms. [REDACTED], Ms. [REDACTED], [REDACTED], and Mr. [REDACTED] were drinking heavily in the main area of the apartment. Ms. Aparicio was in her room. At some point, Ms. [REDACTED] went out to get more beer. Mr. [REDACTED] then began making advances towards Ms. [REDACTED] and [REDACTED] became very angry. [REDACTED] and [REDACTED] went into their room and began shouting at one another. They turned on loud music so that the others could not hear what was being said.
125. Around 7pm or 8pm, Ms. Aparicio left her room to use the bathroom. As she was entering the bathroom, Mr. [REDACTED] came up behind her, grabbed her by the hair and neck, and pushed up against her. He told her that he was glad she was finally alone and tried to grab her by the thighs, at which point she fell into the bathtub with him on top of her.
126. When Ms. Aparicio tried to push him away, Mr. [REDACTED] grabbed her wrists and tried to cover her mouth so that she could not scream. Mr. [REDACTED] then attempted to pull

down her pants and rape her. Ms. Aparicio tried to push him away and began yelling repeatedly, in Spanish, "Let go of me!" ("Suelteame!").

127. At some point, Mr. Mejia came home and heard Ms. Aparicio's screams. He rushed into the bathroom to help her. He started yelling at Mr. [REDACTED] to let her go and said, in Spanish, "You do not treat a woman this way!" ("¡Á una mujer no se trata así!"). Ms. Aparicio could feel Mr. Mejia trying to pull Mr. [REDACTED] off of her. Mr. [REDACTED], who is taller and bigger than Mr. Mejia, turned around, pushed Mr. Mejia into the hallway and began hitting him repeatedly.

128. At some point, Mr. [REDACTED] grabbed Mr. Mejia by the throat and began to choke him. Ms. Aparicio tried to intervene physically and begged Mr. [REDACTED] to let Mr. Mejia go. When it became clear that Mr. [REDACTED] was not going to let go, Ms. Aparicio grabbed her phone, which was in her pocket, and tried to call 911, but Mr. [REDACTED] with his free hand knocked it out of her hand, and it flew across the room.

129. Mr. [REDACTED] then called for Ms. [REDACTED] to help him. When Ms. [REDACTED] eventually appeared, she ran to the kitchen, grabbed a knife, and handed it Mr. [REDACTED]. Mr. [REDACTED] began using the butt of the knife to hit Mr. Mejia over the head. Ms. Aparicio tried to grab the knife from him, and the blade sliced open her finger. At some point, Mr. [REDACTED] fell backward, and Mr. Mejia fell also and smashed his own head against a table. Mr. Mejia was bleeding profusely.

130. Around this time, Ms. [REDACTED] said she was going to call the police and told Ms. Aparicio and Mr. Mejia not to leave. Ms. Aparicio responded, in Spanish, "Why would I leave, if I'm not the one who is guilty?" ("¿Por qué me iría, si no soy el culpable?"). A short while later, four police officers in two separate police cars arrived

at the apartment. Two officers approached the door while the other two waited outside. Ms. [REDACTED] let them in and said something in English that Ms. Aparicio could not understand. The officers were asking Ms. Aparicio questions in English that she did not understand. They did not make any attempt to communicate with her in Spanish or communicate with her through an interpreter.

131. After speaking with Ms. [REDACTED], the police proceeded to handcuff Ms. Aparicio and Mr. Mejia by the ankles and hands and took them separately from the house. One car took Mr. Mejia to the hospital. The other took Ms. Aparicio to the 110th Precinct located at 94-41 43rd Avenue, Queens, NY 11373.
132. When Ms. Aparicio arrived at the 110th Precinct, she was immediately taken to a holding cell, where she waited for several hours. During this time, she was in a lot of pain and wanted to let someone know this so she could get help, but no one approached her to see if she needed help, or to explain to her what was happening.
133. Around midnight, the two officers who had taken her to the precinct took Ms. Aparicio to court. While she was waiting in the courtroom, a man approached her and asked her in Spanish how she was feeling. She said that she was in a lot of pain and did not feel well. He told her she had no color in her face and called the officers over to help her. The two officers then accompanied her to Elmhurst Hospital for treatment.
134. Ms. Aparicio stayed at the hospital the rest of that night and the next day until around 7am on March 16, 2018. One of the officers was with her for the duration of her stay but did not make any attempt to communicate with her in Spanish about what was happening. Ms. Aparicio was handcuffed to the bed by her hands and feet. At some point she asked a nurse who spoke Spanish to loosen her handcuffs because they were

coming off her conviction. The jury said according to the officer, who became very upset and said things Mr. Agaricio could not understand in English. The officer eventually learned her Spanish. I am the right, Mr. Agaricio said in English "told" because she wanted to see the bathroom. The officer kept on her hands off and accompanied her to the bathroom. Mr. Agaricio felt harassed, confused and scared

133. [REDACTED] Mr. Agaricio was discharged from the hospital, she was taken by the officer back to the 151st Precinct. She saw Mr. Mejia in the precinct reception area when she arrived. The two went their ways to another area and put in separate holding cells. At some point, a woman who Mr. Agaricio believed was an attorney, approached the cell with an interpreter. The interpreter began asking her lots of questions about what had happened the night she was arrested. The interpreter looked increasingly confused and it was quite odd to her if Mr. Mejia was her husband and if there had been a conflict between him and Mr. Agaricio. Mr. Agaricio clarified that there was no issue between her and Mr. Mejia and that both of them had been attacked by someone else.

134. Mr. Agaricio was then taken back to court. She was told that Mr. [REDACTED] and Mr. [REDACTED] would be appearing in court as well, but neither appeared. Eventually, Mr. Agaricio was removed from the courtroom and returned to her cell. When she returned, she was given two pieces of paper. The first ordered her appearance in court at a later date. The second was an order of protection prohibiting Mr. Agaricio from going within 100 yards of "the last [REDACTED]" and from any communication with her prison until September 14, 2018. Mr. Agaricio had no way to call or receive calls. Instead her attorney the order of protection was for Mr. [REDACTED]

137. Ms. Aparicio and Mr. Mejia were then escorted back to the apartment where they were given several hours to pack their belongings and move out. They were accompanied by three officers, one of whom spoke only basic Spanish. Maria asked him if she could speak with Ms. [REDACTED], who was at the house, about recovering her deposit and prepaid rent, but she was not able to communicate with him, because his Spanish was very limited.
138. In the 16 days immediately following their arrest, Ms. Aparicio and Mr. Mejia went to the 110th Precinct on three separate occasions to attempt to file a police report documenting their own account of what had happened to them the night of March 14, 2018.
139. On or around March 22, 2018, they entered the reception area and Ms. Aparicio said, “no ingles, español” (in English, “no English, Spanish”). At that point a young woman behind the main desk told her in Spanish to wait. A few minutes later, an officer approached her and asked in basic Spanish, “What do you want?” (in Spanish, “¿Qué quieren?”). Ms. Aparicio responded in Spanish “We hope to file a report” (“Esperamos que hagamos un reporte”). The officer asked her in Spanish why she wanted to file a report, to which she responded, “I came so that the police know that I am not guilty, that I am a victim” (in Spanish, “Llegé así que la policía sepa que yo no soy culpable, que soy la víctima”). The officer or staff member then told them in Spanish, “If you create more problems, we are going to arrest you” (“si ustedes crean más problemas te vamos a arrestar”). Ms. Aparicio and Mr. Mejia were intimidated at this point and said, “Thank you, sorry” (in Spanish, “Gracias, disculpa”) and left.

140. On or around March 28, 2018, Ms. Aparicio and Mr. Mejia returned to the precinct and again asked for interpretation so that they could file a report. Another officer on this occasion approached them and said, “Only more days [have passed], and it’s already been done. There is nothing you can do.” (in Spanish, “Solo más días, y ya está hecho. No hay nada que hacer”). He then told them to “leave before you cause more trouble” (in Spanish, “Tienen que salir antes de que ustedes crean más problemas”).
141. The last time they went to the precinct was on approximately March 30, 2018. They again requested interpretation so they could file a report. This time, an officer told them, “Go to Manhattan – where there is the big one. You can file a report there” (in Spanish, “Vayanse a Manhattan – donde está la grande. Puedan presentar un reporte allí”). Ms. Aparicio and Mr. Mejia left the precinct without understanding what the officer meant by “the big one” and ultimately did not go to Manhattan to file the report. They did not go back to the 110th Precinct thereafter.
142. Ms. Aparicio was never able to go beyond the entrance of the reception area and speak with someone in Spanish about what had happened to her. She never received the interpretation services she requested nor was she able to file a report despite repeated attempts.
143. Ms. Aparicio was homeless for approximately three months after she was ordered to leave the apartment at 104-52 45th Ave. During this time, Ms. Aparicio recalls many days when she felt emotionally incapable of finding work, and on multiple occasions was so depressed that she was unable to get out of bed.

144. Ms. Aparacio lost a lot of their belongings in the course of moving out of the apartment.

It took her and Mr. Mejia several months to save up enough money to rent another apartment.

145. Ms. Aparacio often thinks about what happened to her after her arrest on March 14, 2018. She feels both angry and humiliated by how the police treated her and does not think she would have been treated this way if she spoke English. She has gone to see a therapist many times in an effort to move past what happened to her at 110th Precinct. She has also been prescribed medication that she takes regularly to help her cope with extreme anxiety and depression.

146. Ms. Aparacio has encountered Mr. [REDACTED], Ms. [REDACTED] and her family on a number of occasions. Seeing them scares her and makes her feel very unsafe. She is nevertheless hesitant to seek police protection because she does not believe the police would protect her based on her past interactions with them.

CLAIMS FOR RELIEF

Unlawful Discrimination based on National Origin under the New York City Human Rights Law

147. Complainants reallege and incorporate by reference the foregoing paragraphs as if fully set forth herein.

148. Respondent NYPD is a public accommodation under the NYCHRL.

149. Respondent's failure to offer and provide interpretation services to limited English proficient Complainants and other persons of foreign national origin seeking to access NYPD services creates significant barriers for LEP individuals to access critical

services and unlawfully discriminates against these individuals based on their national origin in violation of the NYCHRL.

150. Respondent's routine denial of access to interpretation for LEP individuals deprives Complainants and other persons of foreign national origin of NYPD services, including the ability to file police reports, receive protection from the NYPD and communicate effectively with the police.

REQUEST FOR RELIEF

Complainants respectfully request that the Commission:

151. Declare that Respondent's practices constitute unlawful discrimination and violate the New York City Human Rights Law.
152. Enjoin further violations of the Complainants and other persons of foreign national origin by issuing an injunction requiring the NYPD to:
- a. Follow the laws and policies, including their own NYPD Language Access Plan, requiring the provision of interpretation services;
 - b. Refrain from unlawful treatment of LEP and foreign-born individuals;
 - c. Establish a system for tracking and monitoring NYPD practices regarding the use of interpreter services;
 - d. Develop and implement appropriate training for members of the NYPD regarding treatment of LEP and foreign-born communities including when to provide an interpreter, how to properly work with interpreters, sensitivity training and cultural competence;

- e. Implement a system of reporting to the Complainants and the Commission regarding the steps taken to cure the violations of the Complainants' and other LEP individuals' rights.
- 153. Award damages to Complainants in an amount to be determined by the Commission, including compensatory damages for emotional distress, economic damages, civil penalties and punitive damages as permitted under the New York City Human Rights Law.
- 154. Award reasonable costs and attorney's fees in an amount to be determined by the Commission.
- 155. Grant any other and further relief as the Commission deems just and proper, including injunctive and declaratory relief as may be required in the interest of justice.

Dated: March 26, 2019
Queens, New York

Respectfully submitted,

MAKE THE ROAD NEW YORK



By: Estee L. Ward, Esq.

92-10 Roosevelt Ave.

Jackson Heights, NY 11372

(718) 565-8500 x4411

Attorney for Complainant

VERIFICATION

State of New York }

County of Queens }

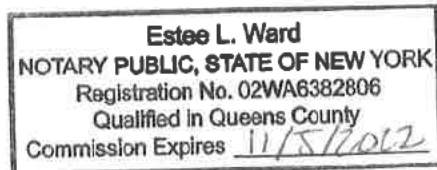
AURA CRUZ, being duly sworn, says:

I am a Complainant in the within action, the contents of the foregoing Complaint and this Verification have been read to me in Spanish and I know and understand their contents. All matters stated in this Complaint are true and correct to the best of my knowledge and belief.


Aura Cruz

Sworn to before me this
25 day of March 2019
in Queens, New York.


NOTARY PUBLIC



VERIFICATION

State of New York }

County of Queens }

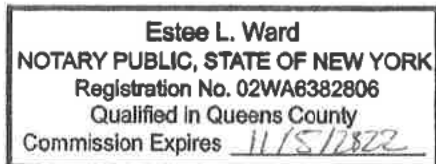
MARIA APARICIO, being duly sworn, says:

I am a Complainant in the within action, the contents of the foregoing Complaint and this verification have been read to me in Spanish and I know and understand their contents. All matters stated in the Complaint are true and correct to the best of my knowledge and belief.

Maria Aparicio Reyes
Maria Aparicio

Sworn to before me this
28 day of March 2019
in Queens, New York.

Estee L. Ward
NOTARY PUBLIC



VERIFICATION

State of New York }

County of Queens }

IRIS VEGA, being duly sworn, says:

I am a Complainant in the within action, the contents of the foregoing Complaint and this Verification have been read to me in Spanish and I know and understand their contents. All matters stated in this Complaint are true and correct to the best of my knowledge and belief.


Iris Vega

Sworn to before me this
25 day of March 2019
in Queens, New York.


NOTARY PUBLIC

<p style="text-align: center;">Estee L. Ward NOTARY PUBLIC, STATE OF NEW YORK Registration No. 02WA6382806 Qualified in Queens County Commission Expires <u>11/5/2022</u></p>

VERIFICATION

State of New York }

County of Queens }

VICTOR SANCHEZ, being duly sworn, says:

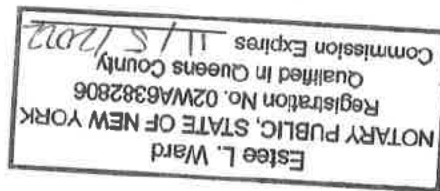
I am a Complainant in the within action, the contents of the foregoing Complaint and this Verification have been read to me in Spanish and I know and understand their contents. All matters stated in this Complaint are true and correct to the best of my knowledge and belief.



Victor Sanchez

Sworn to before me this
25 day of March 2019
in Queens, New York.


NOTARY PUBLIC



CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

-----X
In the Matter of the Complaint of:

MAKE THE ROAD NEW YORK,
IRIS VEGA, VICTOR SANCHEZ,
AURA CRUZ, and MARIA APARICIO,

NOTICE OF APPEARANCE

Complainants,
-against-

NEW YORK CITY POLICE DEPARTMENT

Respondent
-----X

Please take notice that the undersigned attorney, Estee Ward, hereby appears as counsel for Make The Road New York, Iris Vega, Victor Sanchez, Aura Cruz, and Maria Aparicio in their complaint, Case No. M-P-N-17-27554, before the City of New York Commission on Human Rights.

Dated: March 28, 2019

Respectfully Submitted,



Estee Ward
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