

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

<p>LONG ISLAND ROLLER REBELS,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">-against-</p> <p>COUNTY OF NASSAU, THE NASSAU COUNTY LEGISLATURE, BRUCE BLAKEMAN, in his official capacity as Nassau County Executive,</p> <p style="text-align: center;">Defendants.</p>
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INDEX NO: \_\_\_\_\_  
(NYSCEF Filed)

**COMPLAINT**

**PRELIMINARY STATEMENT**

1. This civil rights action challenges an unlawful and discriminatory Nassau County Local Law that prohibits transgender women and girls from participating in women’s and girls’ sporting events at Nassau County facilities.

2. This sweeping Local Law affects approximately 100 athletic facilities across Nassau County and applies with equal force to a breathtakingly wide set of groups ranging from public and private school sports teams, to recreational leagues, to competitive leagues with their own nationally- or internationally- applicable rules regarding inclusion of transgender participants, to casual sports clubs, to groups organizing a one-off charity tournament, to teams traveling to Nassau County for competitions, and everything in between.

3. To gain equal access to facilities pursuant to the Local Law, these groups—and the people who participate in and run them—will be forced to make invasive inquiries about people’s gender identity, intrude upon their privacy and bodily autonomy, and “out” people as transgender. If these groups want to continue using Nassau County facilities, they will have to expel transgender women and girls from their teams or leagues based solely on their gender

identity or forego equal access to public facilities. All of this is plainly prohibited by New York State antidiscrimination law.

4. The Long Island Roller Rebels, a Nassau County-based women’s roller derby league, bring this action to ensure they can use county-run athletic facilities in a manner that is inclusive of all people, including transgender women and girls.

5. All people who use public Nassau County facilities—including transgender women and girls—should have equal access to the transformative power of sports and recreation. The New York State Human Rights Law and the New York State Civil Rights Law give them that right.

6. The Long Island Roller Rebels seek declaratory and injunctive relief declaring the Local Law unlawful and enjoining its enforcement.

#### **PARTIES**

7. Plaintiff Long Island Roller Rebels (the “Roller Rebels”) is a women’s Long Island-based flat track roller derby league whose mission is to educate about, promote and foster involvement in the sport of flat track roller derby through competition on Long Island and abroad, while also giving back to their local community. Their membership includes skaters, referees, non-skating officials, and volunteers. The Roller Rebels are based in North Massapequa, New York, in Nassau County.

8. Defendant the County of Nassau is a county in the State of New York.

9. Defendant the Nassau County Legislature is the legislative branch of the government of Nassau County. It comprises nineteen representatives—one from each of Nassau County’s nineteen legislative districts. On June 24, 2024, the Legislature passed the Local Law that is challenged in this action.

10. Defendant Bruce Blakeman is sued in his official capacity as the County Executive of Nassau County. On July 15, 2024, Executive Blakeman signed the Local Law that is challenged in this action.

### **JURISDICTION AND VENUE**

11. This Court has jurisdiction over this matter pursuant to CPLR 3001, CPLR 6301, section 10 of the Municipal Home Rule Law, section 297 of the Executive Law, and sections 40-c and 40-d of the Civil Rights Law

12. Venue in this proceeding lies in Nassau County pursuant to CPLR 503(a).

### **STATEMENT OF FACTS**

#### ***Gender Identity and Gender Dysphoria***

13. Gender identity is a deep-seated understanding everyone possesses about their own gender.<sup>1</sup>

14. The term “biological sex” is imprecise. A person’s sex encompasses several different biological attributes, including certain chromosomes, certain genes, gonads, the body’s production of and response to certain hormones, internal and external genitalia, secondary sex characteristics, and gender identity. Those attributes are not always aligned in typical ways.<sup>2</sup>

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<sup>1</sup> See NYSED, *Creating a Safe, Supportive, and Affirming School Environment for Transgender and Gender Expansive Students: 2023 Legal Update and Best Practices* (“NYSED Guidance”) at 10, 14 (June 2023), available at <https://www.nysed.gov/sites/default/files/programs/student-support-services/creating-a-safe-supportive-and-affirming-school-environment-for-transgender-and-gender-expansive-students.pdf>.

<sup>2</sup> See Hembree WC, et al., *Endocrine treatment of gender-dysphoria/gender incongruent persons: An Endocrine Society clinical practice guideline*, *Journal of Clinical Endocrinology*, 102: 3869–3903, 3875 (2017), available at <https://academic.oup.com/jcem/article/102/11/3869/4157558>.

15. When a child is born, a sex designation usually occurs at birth based on the infant child's genitals. This designation is then recorded and usually becomes the designation listed on the infant's birth certificate.<sup>3</sup>

16. Most people have a gender identity that aligns with the sex they are assigned at birth. People whose assigned sex at birth corresponds to their gender identity are cisgender.<sup>4</sup>

17. Transgender people are people with a gender identity that differs from their assigned sex at birth.<sup>5</sup>

18. According to the American Psychiatric Association's Diagnostic & Statistical Manual ("DSM-5"), "gender dysphoria" is the diagnostic term for the condition where clinically significant distress results from the lack of congruence between a person's gender identity and the sex they are designated at birth. Individuals living with gender dysphoria often experience severe psychological harm and suffering, including anxiety, depression, and/or thoughts of suicide—and this distress can be exacerbated by stigmatization, discrimination, and victimization.

19. For transgender people of all ages, a critical part of treatment is affirming "social transition": the process by which a person expresses themselves consistently with gender identity.<sup>6</sup>

20. Forcing a person with gender dysphoria to live in a manner that does not align with the person's gender identity undermines their "social transition."<sup>7</sup> For example, requiring a

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<sup>3</sup> See NYSED Guidance at 9-10.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> See *id.* at 14.

<sup>7</sup> *Id.*

girl who is transgender to use facilities or participate in single-sex activities for boys can be deeply harmful and disruptive to treatment.

### *Participation in Athletics*

21. Participation in sports, at any age or any level, offers people a range of physical and emotional health benefits and is related to better mental health, including improved psychological well-being, such as higher self-esteem and life satisfaction, and lower psychological ill-being, such as reduced levels of depression, anxiety, and stress.<sup>8</sup>

22. Participation in team sports in particular also leads to improved social outcomes, such as better self-control, pro-social behavior, interpersonal communication, and fostering a sense of belonging.<sup>9</sup> By contrast, when people are excluded from participating in sports, or do not feel accepted or respected, they do not have the opportunity to reap these benefits.

23. For youth, participation in sports has a documented positive effect on academic achievement, with student athletes generally experiencing better academic achievement than students who are not athletes.<sup>10</sup> Students who participate in high school sports are more likely to finish college and more likely to be actively engaged in planning for their future after their athletic career ends.

24. Through participation in sports, people learn to better manage academic and social pressures. Participation in sports provides people the opportunity to make friends and

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<sup>8</sup> See Eather, N., Wade, L., Pankowiak, A. et al., *The impact of sports participation on mental health and social outcomes in adults: a systematic review and the 'Mental Health through Sport' conceptual model*, Syst Rev 12, 102 (2023), available at <https://doi.org/10.1186/s13643-023-02264-8>.

<sup>9</sup> *Id.*

<sup>10</sup> See e.g. Angela Lumpkin & Judy Favor, *Comparing the Academic Performance of High School Athletes and Non-Athletes in Kansas in 2008-2009*, 4 J. Sport Admin & Supervision 41 (2012), available at <http://hdl.handle.net/2027/spo.6776111.0004.108>.

become part of a supportive community of teammates and peers, easing social pressures to “fit in.”<sup>11</sup> It also reduces the effects of risk factors, such as stressful life events, that lead to increases in depression.<sup>12</sup> Learning how to manage these pressures at a young age provides benefits that continue throughout a person’s life—even after their participation in sports has ended.

25. Through sports, people develop social skills and an emotional maturity that allow them to create and sustain life-long friendships. Athletes spend considerable time with their teammates, often experiencing high-pressure situations together that lead to deeper and more meaningful social bonds and friendships. These sports experiences in turn result in reduced anxiety and higher self-esteem.<sup>13</sup>

26. Policies that exclude women and girls who are transgender from athletic competition for women and girls limit the benefits of athletics for *all* women and girls and discourage, rather than encourage, participation in athletics. Such policies also interfere with treatment for gender dysphoria, increase shame and stigma, and contribute to negative physical and emotional health outcomes.

***Nassau County Local Law Banning Transgender Women and Girls from Sports Participation at County Facilities***

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<sup>11</sup> See Erin M. Boone & Bonnie J. Leadbeater, *Game On: Diminishing Risks for Depressive Symptoms in Early Adolescence Through Positive Involvement in Team Sports*, 16 J. Res. Adolesc. 79 (2006), available at <https://doi.org/10.1111/j.1532-7795.2006.00122.x>.

<sup>12</sup> See *id.* at 79, 88.

<sup>13</sup> See Leanne C. Findlay, & Robert J. Coplan, *Come Out and Play: Shyness in Childhood and the Benefits of Organized Sports Participation*, 40 Canadian J. Behavioural Science / Revue Canadienne des sciences du comportement 153 (2008), available at <https://doi.org/10.1037/0008-400X.40.3.153>.

27. On June 24, 2024, the Nassau County Legislature enacted Local Law 121-24, titled “A Local Law to Maintain a Safe and Fair Competitive Environment for Women and Girls Participating in Sports and Athletic Events” (the “Local Law”), which prohibits transgender women and girls, and teams or leagues that include or welcome transgender women and girls, from participating in women’s and girls’ sporting events at Nassau County facilities.

28. Nassau County Executive Bruce Blakeman signed the Local Law on July 15, 2024. The Local Law became effective immediately upon its signing.

29. Executive Blakeman previously issued an Executive Order (the “Order”) that was identical in substance to the Local Law. On May 10, 2024, the Nassau County Supreme Court vacated and permanently enjoined enforcement of the Order because the County Executive “did not have authority” to issue the Order. The County Legislature has now codified the provisions of the Order through enactment of the Local Law.

30. Specifically, the Local Law requires that any sports league, team, organization, program, or other sports entity seeking to use a Nassau County facility for the purpose of organizing a sporting event or competition must “expressly designate” itself as “male,” “female,” or “coed,” “based on the biological sex at birth of the team’s individual competitors.”

31. The Local Law prohibits the Nassau County Department of Parks, Recreation & Museums from issuing any permit for a sporting event or competition by an entity designated for “females, women, or girls” that allows “biological males” to participate.

32. The Local Law defines gender as “an individual’s biological sex assigned to that individual at birth,” as stated on an “official birth certificate . . . filed at or near the time of . . . birth,” and does not allow for consideration of any changes to the sex designation on an

individual's birth certificate. The onus falls on the sports organization to determine each player's sex assigned at birth.

33. In New York State, individuals can legally change the gender marker on their birth certificate.<sup>14</sup> When a gender marker is amended on a birth certificate, the original birth certificate and all other documents relating to the gender marker are considered confidential and retained in a sealed file.<sup>15</sup>

34. The Local Law's requirement for teams to ask for confirmation of—and only consider—“an individual's biological sex assigned to that individual at birth” would require ignoring legal gender marker amendments on an individual's birth certificate made pursuant to state law *and* ignoring statutory protections guaranteeing confidentiality in that information.

35. The Local Law broadly applies to approximately 100 different facilities used by the public for sports activities, including, among others, swimming pools, ice rinks, soccer fields, baseball fields, basketball courts, and golf courses.

36. Eisenhower Park, for example, is one of the largest public spaces in the New York metropolitan area. It serves as a hub for community gatherings and athletic activities due to its large collection of tennis courts, indoor and outdoor ice-skating rinks, outdoor athletic fields of various kinds, golf courses, a world-class Aquatic Center, and more. Reserving these athletic facilities for certain sporting events and competitions requires a permit issued by the Parks Department, and permit approval is now contingent on compliance with the Local Law.

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<sup>14</sup> See e.g. Civil Rights Law §§ 67, 67-B (permitting the amendment of a “sex designation” on a birth certificate, regardless of sex assigned at birth, and ordering the “records of such change of sex designation proceeding to be sealed”); Public Health Law §§ 4132, 4138[f] (same).

<sup>15</sup> New York State Department of Health, *Gender Designation Amendments*, available at [https://www.health.ny.gov/vital\\_records/gender\\_designation\\_corrections.htm](https://www.health.ny.gov/vital_records/gender_designation_corrections.htm); see also Civil Rights Law §§ 67, 67-B.

37. The Local Law sweeps so broadly that it applies to any sporting event whatsoever without limitation—no matter what level or skill is needed to participate in a game or event. It will affect a wide range of groups from public and private school sports teams, to recreational leagues, to competitive leagues with their own nationally- or internationally-applicable rules regarding inclusion of transgender participants, to casual sports clubs, to groups organizing a one-off tournament, and everything in between.

38. And it is not just limited to local teams or leagues—it would also affect any organization that travels to use Nassau County’s wide array of athletic facilities for any sporting event.

39. The Local Law applies equally to a recreational adult women’s golf league as it does to a charity field day organized by a youth organization for girls.

40. Enforcement of the Local Law will result in invasive policing of gender identity and expression that will intrude upon the privacy and bodily autonomy of women and girls, both cisgender and transgender.

41. The requirement that an individual’s gender identity must match their “biological sex at birth” means women’s and girls’ teams will have to subject all their players to intrusive and inappropriate questioning, tests, or verification requirements to comply with permitting policies, and then “out” any transgender women or girls and expel them from the team in order to obtain a permit. Any cisgender or transgender woman may face accusations of being “too masculine” to participate in a women’s sports team.

42. For example, to comply with the Local Law, a public school teacher who coaches a middle school girls’ softball team that attends games or tournaments on Nassau-run fields will now be in the position of having to certify the “biological sex” of all of her team’s

members. This teacher may need to ask students what genitals they have, or require copies of every team member's birth certificate, or collect doctor's notes attempting to verify a participant's "biological sex." If the teacher identifies that any team member is transgender, even if the student's status is confidential, the teacher would then be forced to choose between adhering to state law that requires her to treat transgender girls consistent with their gender identity or removing transgender girls from the team in order to use county facilities. A local women's advocacy organization organizing a charity tennis tournament would similarly be forced to comply with these "biological sex" verification requirements.

43. Executive Blakeman has stated that the County's purpose in enacting the Order—which was substantively identical to the Local Law—was to "protect women from bullying by transgender females who want to compete against biological females."<sup>16</sup> This justification for the Local Law is premised on the idea that the mere existence of transgender women and girls is a threat to cisgender women and girls.

44. Executive Blakeman has repeatedly characterized transgender girls who play on girls' sports teams as lying about their gender identity and trying to "inject themselves" into girls' sports while referring to them as "males"—perpetuating dangerous stereotypes that transgender girls are not real girls.

45. The Local Law is a solution to a problem that does not exist in Nassau County. Prior to the Local Law's enactment, Executive Blakeman could not publicly identify any specific complaints regarding transgender athletes in women's or girls' sports in Nassau County. As

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<sup>16</sup> Michael Malaszczyk, *AG Calls Transgender Sports Ban Illegal, Nassau Exec Hits Back*, Long Island Press (Mar. 1, 2024), available at <https://www.longislandpress.com/2024/03/01/nassau-county-transgender-ban-update/>.

recently as June 24, 2024, a representative from the Nassau County Attorney's Office confirmed the same.

46. On its face, the Local Law subjects transgender women and girls to differential treatment on the basis of their gender identity. It denies them the opportunity to participate in sporting events at public facilities that align with their gender identity if their gender identity does not match their sex assigned at birth.

***New York State Law Explicitly Prohibits Discrimination on the Basis of Gender Identity***

47. Prior to the enactment of the Local Law, participation in sports at public facilities in Nassau County had for years been governed by the same New York State antidiscrimination laws and regulations that apply throughout the state.

48. The Local Law was issued against a backdrop of clear state statutory protections, regulations, and guidance that prohibit discrimination on the basis of gender identity in public accommodations—like publicly-run athletic facilities—and in programs run by schools that use such facilities.

49. In 2019, the New York State Legislature passed the Gender Expression Non-Discrimination Act (“GENDA”), which added explicit protections for transgender and gender-nonconforming New Yorkers, including by explicitly adding gender identity and expression to the list of categories protected by the New York State Human Rights Law (“NYSHRL”), the Civil Rights Law section 40-c, and the Education Law section 313. (Executive Law §§ 291, 296, 296-a & 296-b; Civil Rights Law § 40-c; Education Law § 313.) GENDA defines “gender identity or expression” as “a person’s actual or perceived gender-related identity, appearance, behavior, expression, or other gender-related characteristic regardless of the sex assigned to that

person at birth, including, but not limited to, the status of being transgender.” (Executive Law § 292 [35].)

50. Following the passage of GENDA, the New York State Division of Human Rights issued guidance on protections from gender identity discrimination under the NYSHRL to explain the various ways in which gender identity discrimination can occur. The guidance provides that “[a]ll . . . places of public accommodation . . . must offer terms, conditions and benefits equally, regardless of gender identity or expression” and that a “place of public accommodation. . . must permit a person to participate in [] sex-segregated services or programs consistent with their gender identity or expression.”<sup>17</sup>

51. The New York State Department of Education (“NYSED”) has also issued guidance regarding transgender and gender expansive students to facilitate compliance with state and federal laws, including the New York State Dignity for All Students Act and federal Title IX requirements. NYSED’s June 2023 Legal Update states that, in athletics, “. . . students should be allowed to participate in a manner most consistent with their gender identity without penalty.”<sup>18</sup>

52. The New York State Public High School Athletic Association, the governing body for interscholastic sports in public schools, is also “committed to providing all students with the opportunity to participate . . . in a manner consistent with their gender identity and the New York State Commissioner of Education’s Regulations.”<sup>19</sup>

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<sup>17</sup> New York State Division of Human Rights, *Guidance on Protections from Gender Identity Discrimination Under the New York State Human Rights Law* at 9 (Jan. 29, 2020), available at <https://dhr.ny.gov/system/files/documents/2022/04/nysdhr-genda-guidance-2020.pdf>.

<sup>18</sup> NYSED Guidance at 25.

<sup>19</sup> New York State Public High School Athletic Association, *NYSPHSAA Handbook* at 51, available at [https://nysphsaa.org/documents/2023/8/21/NYSPHSAA\\_Handbook\\_004.pdf](https://nysphsaa.org/documents/2023/8/21/NYSPHSAA_Handbook_004.pdf).

53. The New York Attorney General Letitia James, who is charged with enforcing New York State law, has stated that Nassau County's efforts to prohibit transgender women and girls from participating in women's and girls' sports are "in clear violation of New York State anti-discrimination laws."<sup>20</sup>

### *The Long Island Roller Rebels*

54. The Long Island Roller Rebels, a women's roller derby league based in Nassau County, were founded in 2005.

55. The mission and goal of the Roller Rebels is to educate about, promote and foster involvement in the sport of flat track roller derby through competition on Long Island and abroad, while also giving back to their local community.

56. Flat track roller derby is a fast-paced contact team sport that requires speed, strategy, and athleticism. Flat track roller derby events require certain types of flat surfaces suitable for skating, such as skating rinks and basketball courts.

57. The Roller Rebels are comprised of skaters, referees, and non-skating league members, including non-skating officials and volunteers. They currently have approximately 50 members.

58. The Roller Rebels are committed to inclusive policies and antidiscrimination principles, and they welcome all transgender women, intersex women, and gender-expansive women to participate.

59. The Roller Rebels are a women's league. They do not inquire about the sex assigned at birth of their players because they aim to ensure that all skaters' and volunteers'

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<sup>20</sup> State of New York, Office of the Attorney General, *Cease and Desist Notification Letter* (Mar. 1, 2024), available at <https://ag.ny.gov/sites/default/files/letters/2024.3.1-cess-and-desist-nassau.pdf>.

rights are respected and protected. Their league is built upon strong individuals of every background, career, family/marital status, fitness level, and personality.

60. The Roller Rebels are an adult recreational league. Each member who joins understands the league's participation policies and safety standards.

61. The Roller Rebels currently have at least one league member who would be prohibited from participating in their league under the clear language of the Local Law. In the past, they have also had at least one league member who would be prohibited under the clear language of the Local Law.

62. The Roller Rebels also include cisgender league members who are themselves being discriminated against for their association with transgender team members.

63. The Roller Rebels are concerned that the Local Law will also hurt their ability to grow as a league moving forward.

64. The Local Law will hamper their ability to recruit new members—transgender and cisgender women alike may not want to want to disclose confidential information about their gender identity or be subjected to invasive inquiries about their private medical information in order to play recreational team sports.

65. The Local Law will also make it difficult for the Roller Rebels to compete against other women's roller derby leagues that are inclusive of transgender women because it will restrict the available venues for scheduled games and sporting events.

66. The Roller Rebels are a member of the Women's Flat Track Roller Derby Association ("WFTDA"), the sport's foremost governing body with more than 400 member leagues who compete, collaborate, and network with each other. The WFTDA welcomes all transgender women, intersex women, and gender-expansive women to participate in its member

leagues. The sex assigned at birth of any and all WFTDA participants is considered confidential and private.

67. The Roller Rebels have previously used outdoor skating rinks at Nassau County athletic facilities for team practices and events.

68. For months, the Roller Rebels have been searching for additional facilities to use for team practices, games, and events to improve their skills and expand their league. The private facilities the Roller Rebels primarily use for practices and games have limited availability, which makes scheduling and participation difficult. The Roller Rebels currently lack enough practice and game times that are accessible to people who want to join their league.

69. On March 11, 2024, the Roller Rebels submitted a request for a permit to use Nassau County Parks facilities for a series of games beginning April 13, 2024. That application has not been approved.

70. The Roller Rebels are organizing a series of upcoming women's roller derby games and recurring team practices and would like to use Nassau County Parks athletic facilities. They have now submitted another permit request to use Ceder Creek Park, Eisenhower Park, and other county-run facilities suitable for skating for their events.

71. Under the Local Law, the Roller Rebels were forced to expressly designate themselves as a league for "females, women, or girls" on their application. The Roller Rebels are not a co-ed league and would not designate themselves as such.

72. Because the Roller Rebels allow transgender women to participate on their team, their permit request violates the terms of the Local Law, and the Parks Department will be required to deny any request to access Nassau County facilities.

73. To comply with the Local Law, the Roller Rebels would either have to exclude transgender women from their league—in direct contradiction to their internal values and the WFTDA’s participation policies—or forego equal access to Nassau County facilities.

**FIRST CLAIM FOR RELIEF**  
**New York State Human Rights Law, Executive Law § 296**

74. The Roller Rebels re-allege all preceding paragraphs as if fully set forth herein.

75. The Local Law violates New York Executive Law section 296 because it denies access to public accommodations on the basis of gender identity, sex, and disability, and it further requires other covered entities, including public accommodations and educational institutions, to discriminate on the basis of gender identity, sex, and disability.

**SECOND CLAIM FOR RELIEF**  
**New York Civil Rights Law § 40-c**

76. The Roller Rebels re-allege all preceding paragraphs as if fully set forth herein.

77. The Local Law violates New York Civil Rights Law section 40-c because it denies access to public accommodations on the basis of gender identity, sex, and disability, and it further requires other covered entities, including public accommodations and educational institutions, to discriminate on the basis of gender identity, sex, and disability.

78. The Roller Rebels have complied with the requirements of New York Civil Rights Law section 40-d by serving notice on the state Attorney General.

**THIRD CLAIM FOR RELIEF**  
**New York Municipal Home Rule Law § 10**

79. The Roller Rebels re-allege all preceding paragraphs as if fully set forth herein.

80. The Local Law violates New York Municipal Home Rule Law section 10 because it is inconsistent with the New York State Human Rights Law, Executive Law section 296, and the New York Civil Rights Law section 40-c.

**PRAYER FOR RELIEF**

WHEREFORE, the Roller Rebels respectfully request judgment as follows:

- A. Issue preliminary relief enjoining enforcement of the Local Law during the pendency of this action;
- B. Declare that the Local Law violates the New York State Human Rights Law, Executive Law § 296, the New York Civil Rights Law § 40-c, and the New York Municipal Home Rule Law § 10;
- C. Issue injunctive relief permanently enjoining the Local Law;
- D. Award the Roller Rebels reasonable attorney’s fees and costs; and
- E. Grant any other relief the Court deems just and proper.

Dated: July 15, 2024  
New York, New York

Respectfully submitted,  
  
NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION

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