

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

RITA BAHNAN,

Plaintiff,

-against-

JAMAICA HOSPITAL MEDICAL CENTER,
MEDISYS HEALTH NETWORK, INC., and
DR. ROBERT LASKOWSKI,

Defendants.

Index No.:

Plaintiff Designates New York County
as the Place of Trial

SUMMONS

Plaintiff's Address:
c/o Emery Celli Brinckerhoff
Abady Ward & Maazel LLP
One Rockefeller Plaza, 8th Floor
New York, NY 10020

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: June 23, 2026
New York, New York

EMERY CELLI BRINCKERHOFF
ABADY WARD & MAAZEL LLP

By: _____ /s/
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**COMPLAINT AND
JURY DEMAND**

Plaintiff Rita Bahnan, by her attorneys Emery Celli Brinckerhoff Abady Ward & Maazel LLP, alleges as follows for her complaint:

INTRODUCTION

1. Jamaica Hospital Medical Center (“Jamaica Hospital” or the “Hospital”), part of the MediSys Health Network, is a hostile work environment for women.

2. Jamaica Hospital has enabled one of its surgeons, Dr. Robert Laskowski, to repeatedly sexually harass female subordinates, including Plaintiff Rita Bahnan, who is a physician’s assistant employed at Jamaica Hospital, as well as female residents and even other doctors at the Hospital.

3. Despite repeated reports of sexual misconduct by Dr. Laskowski, Jamaica Hospital failed to discipline him or take any effective action to protect women from him.

4. Instead, it repeatedly *promoted* him.

5. Dr. Laskowski is now the Associate Surgeon in Chief of the Department of Surgery at Jamaica Hospital.

6. On December 20, 2024, Dr. Laskowski became extremely intoxicated at the Jamaica Hospital holiday party (even though, on information and belief, he was on backup call that night) and repeatedly groped Ms. Bahnan's backside, picked her up, forced her to try to dance with him, propositioned her, and told another doctor he wanted to "fuck her."

7. At the same holiday party, on information and belief, Dr. Laskowski repeatedly grabbed a Hospital female administrative assistant by the hair and pulled her head towards his crotch, simulating oral sex, and said "I've been wanting to do this for a while."

8. Three years before, Jamaica Hospital received a report that Dr. Laskowski was sexually harassing female residents.

9. In the fall of 2021, Dr. Laskowski sexually harassed and then groped the backside of resident Dr. Nicole Meredyth while she was turning a critically ill patient.

10. On another occasion in the fall of 2021, Dr. Laskowski intentionally pressed his penis against Dr. Meredyth's backside while she was assisting with intubating a patient in the emergency room.

11. In the fall of 2021, Dr. Meredyth reported Dr. Laskowski's sexual harassment to two supervisors, one of whom reported it to Dr. Kenneth Fretwell, the Chair of the Department of Surgery at Jamaica Hospital.

12. On information and belief, however, Jamaica Hospital took no measures to effectively discipline Dr. Laskowski or keep him from sexually harassing other female employees.

13. Unchecked by the Hospital, Dr. Laskowski went on to sexually harass another surgeon at the hospital, Dr. Elizabeth Fontana. In 2023, Dr. Laskowski repeatedly texted Dr. Fontana about her physical appearance and to ask her out for drinks. On August 18, 2023, at a

gathering at Dr. Fontana's home where her children were present, Dr. Laskowski became drunk, physically shoved Dr. Fontana, refused to leave, and even after Dr. Fontana made it clear that she was not interested in him, repeatedly texted her about her "ass," including writing that her "ass looked fucking phenomenal. Only wish I could have known more."

14. Like Dr. Meredyth before them, both Dr. Fontana and Ms. Bahnan reported Dr. Laskowski's sexual harassment to the Hospital's administration, filing written HR complaints in May 2025.

15. But again, on information and belief, Jamaica Hospital took no effective action to discipline Dr. Laskowski or keep female employees safe from him.

16. Instead, Jamaica Hospital twice promoted Dr. Laskowski, first in 2023 to Associate Trauma Medical Director, and then again in 2024 to Associate Surgeon in Chief of the Department of Surgery.

PARTIES

17. Plaintiff Rita Bahnan is a resident of New York County in New York City. She works as a physician's assistant at Jamaica Hospital on a per diem basis.

18. Defendant Jamaica Hospital is located in New York City and is an employer of Ms. Bahnan.

19. Defendant MediSys Health Network, Inc. ("MediSys") is located in New York City and is an employer of Ms. Bahnan.

20. Defendant Dr. Robert Laskowski is, on information and belief, a resident of Nassau County, New York, and is a supervisor of Ms. Bahnan.

JURISDICTION AND VENUE

21. This Court has jurisdiction over this matter because Plaintiff resides in New York County.

22. Plaintiff designates New York County as the place of trial pursuant to CPLR 503 and 509.

JURY DEMAND

23. Plaintiff demands a trial by jury.

FACTS

A. Dr. Laskowski Sexually Harasses Dr. Meredyth and Jamaica Hospital Does Nothing

24. In 2021, Dr. Nicole Meredyth was a resident doing a rotation at Jamaica Hospital.

25. Dr. Laskowski singled her out, was inappropriately flirtatious, and made sexual advances, frequently telling her about how his marriage was disintegrating and he was single.

26. On multiple occasions, Dr. Laskowski tried to lure Dr. Meredyth into the basement under the pretext of “changing scrubs” together.

27. Dr. Laskowski also routinely stood inappropriately close to Dr. Meredyth’s backside while she was operating and caring for patients, even when he had no role in the procedure.

28. On one occasion in the fall of 2021, Dr. Laskowski again came up close behind Dr. Meredyth while she was turning (“proning”) a critically ill patient in the SICU.

29. Dr. Laskowski then grabbed Dr. Meredyth’s buttocks without her consent, groped her for approximately 15 to 20 seconds, and then grabbed her waistband and pulled her pants up, saying “oh, your underwear is showing.”

30. A few weeks later, Dr. Laskowski again came up close behind Dr. Meredyth while she was assisting with an intubation in the emergency room and standing above the patient, scalpel in hand, and ready to make an incision in case she needed to perform a cricothyrotomy.

31. Dr. Laskowski then deliberately pressed his penis against Dr. Meredyth's backside.

32. During both of these incidents, Dr. Meredyth was focused on a patient's care and could not react without breaking her concentration and jeopardizing the patient's safety.

33. Dr. Laskowski took advantage of Dr. Meredyth being preoccupied with patient care to sexually harass and grope her without regard for the dangers he was creating for patient safety.

34. On or about October 14, 2021, Dr. Laskowski came up to Dr. Meredyth in the SICU, with his hand fiddling in his pocket, and said: "sorry I'm just playing with the condoms in my pocket. There were a bunch in clinic so I took some."

35. Dr. Meredyth was upset, uncomfortable, and scared of Dr. Laskowski.

36. On or about October 14, 2021, together with another resident, she reported his sexual harassment, including the incident where he groped her and the incident when he pressed his penis against her, to two supervisors at Jamaica Hospital.

37. One of those supervisors in turn reported her complaint on to Dr. Fretwell, the Chair of the Department of Surgery of Jamaica Hospital.

38. On information and belief, Jamaica Hospital took no action in response to Dr. Meredyth's complaint and did not effectively discipline Dr. Laskowski or take any action to protect women from him.

39. Instead, in 2023, Jamaica Hospital promoted Dr. Laskowski to Associate Trauma Medical Director and then again in 2024 to Associate Surgeon in Chief of the Department of Surgery.

40. No one from Human Resources or anyone else in the Jamaica Hospital's leadership or administration contacted Dr. Meredyth about her complaint until November 2025, *four years* after she made the complaint.

41. Dr. Meredyth subsequently learned that Dr. Laskowski's prior employer, the Shock Trauma Center at University of Maryland Medical Center, had banned Dr. Laskowski from working with female medical students because of complaints of sexual harassment against him.

42. On information and belief, Jamaica Hospital either knew, or should have known, about Dr. Laskowski being banned from working with female medical students at the University of Maryland Medical Center.

43. Jamaica Hospital did not care about Dr. Laskowski's pattern of sexual harassment, because Jamaica Hospital has a long history of tolerating sexual harassment and gender discrimination by male surgeons.

44. On information and belief, Jamaica Hospital tolerated years of sexual harassment and gender discrimination by another surgeon, Dr. William Nugent, who was infamous for his misogyny—once calling a female resident a “cunt” for disagreeing with him, and once telling another female resident that she should kill herself—and for having sex with female subordinates from the Hospital.

45. On information and belief, at least two female surgeons were forced to resign from Jamaica Hospital as a result of Dr. Nugent's behavior.

46. On information and belief, Jamaica Hospital also tolerated years of sexual harassment and gender discrimination by Dr. Edmund Kessler, who is equally infamous for mistreating and sexually harassing female residents, and continues to work at the Hospital.

47. On information and belief, in or around early 2022, a Cornell University resident doing a rotation at Jamaica complained to Cornell's Office of Graduate Medical Education about Dr. Kessler's harassment of female subordinates, since Dr. Kessler also maintained an appointment at Cornell, resulting in Cornell initiating some disciplinary action. But Jamaica Hospital, where Dr. Kessler continues to work with residents, took no action to discipline him or protect female employees from harassment by him.

B. Dr. Laskowski Sexually Harasses Dr. Fontana

48. In 2022, the year after Dr. Meredyth reported Dr. Laskowski's sexual harassment to Jamaica Hospital, Dr. Elizabeth Fontana joined Jamaica Hospital as a neurosurgeon.

49. Dr. Laskowski repeatedly commented on Dr. Fontana's appearance, called her "babe," and frequently suggested they meet for "drinks."

50. Dr. Fontana attempted to keep their relationship professional and responded in a friendly but not sexual manner.

51. On the night of August 5, 2023, Dr. Laskowski sent multiple texts to Dr. Fontana, trying to get her to meet him for drinks.

52. She did not respond.

53. On August 18, 2023, Dr. Fontana was enjoying dinner at her home with her three children and a female friend.

54. At approximately 7:05 PM, Dr. Laskowski texted Dr. Fontana "I'm bored."

55. Dr. Fontana did not respond.

56. An hour later, Dr. Laskowski texted again: “And you must be asleep...[.]”

57. Out of politeness, and since Dr. Laskowski had been asking for months to meet, Dr. Fontana invited him to join her friend and kids for pizza, a setting that could not be confused for a date.

58. Over the course of the evening, Dr. Laskowski became intoxicated.

59. While telling a story, he inappropriately and forcefully shoved Dr. Fontana.

60. The incident made Dr. Fontana uncomfortable and acutely aware of Dr. Laskowski’s large size and strength.

61. After Dr. Fontana’s friend left, Dr. Laskowski made it clear he wanted to stay over for the night. He made himself comfortable on Dr. Fontana’s couch. Dr. Fontana repeatedly asked how he intended to get home, but Dr. Laskowski did not leave.

62. Instead, he explicitly asked if he could stay.

63. Dr. Fontana said “no.”

64. Dr. Laskowski aggressively and inappropriately proclaimed his wife was sleeping around with other men.

65. At this point, Dr. Fontana was frightened. Dr. Laskowski was drunk, much larger than her, had already shoved her, and was now refusing to leave.

66. Eventually Dr. Fontana was able to get Dr. Laskowski out of her apartment.

67. Despite *just* being told unequivocally that Dr. Fontana had no interest in any sexual relationship, Dr. Laskowski immediately sent Dr. Fontana a series of sexually explicit text messages, including telling her: “Your ass looked fucking phenomenal in that pink dress. Only wishing I could have known more.”

68. After Dr. Fontana responded politely by stating that “marriage is hard” and encouraging him not to “give up on it,” Dr. Laskowski made a pass at her again, which he acknowledged was “probably too much.” He again commented on her body, texting that “not all women have the looks, brains, personality, and ASS, that you do.”

69. He then propositioned her again, telling her that “[i]f you had asked me to spend the night, I would have.”

70. He commented on her body *again*, writing: “I find you to be an incredibly phenomenally attractive and impressive woman. And yeah, you have an ass that grabs my attention at least.”

71. Dr. Fontana texted back: “can’t do married.”

72. For the next several months, Dr. Laskowski continued to try engaging Dr. Fontana by text.

73. Dr. Fontana either did not respond or responded in a limited way to try to be polite given that she had to continue to see him at work at the Hospital.

74. Dr. Laskowski’s harassing advances were not limited to text messages.

75. Dr. Laskowski often made comments on Dr. Fontana’s physical appearance, including her body, clothes, and hair.

76. In one particularly egregious instance, he told her “when you got up and I could see the outline of your underwear, it’s a good thing I had scrubs on,” clearly implying he had an erection from staring at her.

77. Another time, he commented on a hole in the seat of her pants, making clear he had, again, been staring at her backside.

78. Dr. Laskowski's assigned parking spot was close to Dr. Fontana's and he often lingered in his car in an apparent attempt to force interaction with her in the empty garage—when she was alone—which she found especially frightening.

79. He also tried repeatedly (and unsuccessfully) to lure her to his office with a promise of a “gift,” which he later described as an army field officer training guide—an item of no professional relevance whatsoever.

80. In 2024, Jamaica Hospital promoted Dr. Laskowski to Associate Surgeon in Chief of the Department of Surgery, a position overseeing Dr. Fontana's department.

81. Dr. Laskowski used his new authority to retaliate against Dr. Fontana for rejecting his advances.

82. For example, he started attending Dr. Fontana's weekly divisional meeting, which she had been conducting for over two years without him or his predecessor.

83. In one meeting, he took photos of Dr. Fontana without her permission and then texted them to her.

84. After her divisional meetings, he frequently cornered her in the hallway, making disparaging and intimidating remarks such as “you need to be a boss,” “do you know what's going on in your department,” and “your division is shit.”

85. At one point, he found her alone in the hallway and threateningly asked: “Let me ask you something. Do you even want this job?”

86. He also forced physical contact with Dr. Fontana. On one occasion, he refused to move until she shook his hand, and, on another, he placed his hand on her back.

87. Dr. Laskowski also repeatedly intruded into Dr. Fontana's operating room while she was performing neurosurgeries.

88. Just as he had done with Dr. Meredyth a few years earlier, Dr. Laskowski lurked uncomfortably close to Dr. Fontana's backside while she was operating.

89. There was no professional or supervisory justification for these visits. Dr. Laskowski is not a neurosurgeon, and he never provided Dr. Fontana any substantive feedback or other help. He is the *only* general surgeon who has ever entered Dr. Fontana's operating room for any reason other than assisting with a medical procedure. Dr. Laskowski also never asked for Dr. Fontana's consent to enter her operating room, breaking standard procedure and etiquette.

90. These visits were not only unwelcome and intimidating, but also distracting, putting patients' safety at risk.

C. Dr. Laskowski Sexually Harasses Ms. Bahnan and Another Subordinate

91. In December 2024, Dr. Fontana did not want to attend the Jamaica Hospital holiday party out of fear of encountering Dr. Laskowski there, particularly if he was intoxicated.

92. Dr. Fontana gave her ticket to the holiday party to a physician's assistant named Rita Bahnan.

93. Ms. Bahnan had been working at Jamaica Hospital on a per diem basis since October 2023.

94. Unbeknownst to Dr. Fontana at the time, Dr. Laskowski was already sexually harassing Ms. Bahnan as well.

95. During Ms. Bahnan's first shift at Jamaica Hospital, she was called to assist with a level 1 trauma, the most serious level of trauma.

96. Dr. Laskowski was the attending surgeon for the procedure.

97. Dr. Laskowski immediately fixated on Ms. Bahnan.

98. As Ms. Bahnan and the rest of the team focused on providing the critically injured patient with medical care, Dr. Laskowski stood extremely close to Ms. Bahnan, instead of standing at the head of the bed where the attending surgeon typically stands, and initiated a personal conversation that was inappropriately flirtatious and unwelcome.

99. Ms. Bahnan was uncomfortable.

100. After that, when Dr. Laskowski saw Ms. Bahnan at Jamaica Hospital, he engaged in the same pattern of behavior. He stood too close to her in an overbearing manner and stared at her inappropriately. He frequently touched her upper arm when talking to her. When Ms. Bahnan tried to back away to create a professional distance between them, Dr. Laskowski pressed closer.

101. In December 2024, when Dr. Laskowski arrived at the holiday party, he immediately approached Ms. Bahnan, who was standing near the entrance.

102. As was his practice, he stood inappropriately close to her. He put his hand on her lower back. He said: "Wow. You look good in your scrubs, but you look even better in your outfit." He repeated several times: "Wow. You look amazing. You look great."

103. Ms. Bahnan was uncomfortable and did not respond in kind.

104. Dr. Laskowski then said: "I'm going to keep my comments to myself. I don't want to, but I will."

105. Ms. Bahnan responded: "You probably should."

106. Ms. Bahnan began to walk away, but Dr. Laskowski reached out and touched her upper thigh and said: "See you later."

107. Ms. Bahnan went over to some other colleagues.

108. Dr. Laskowski followed her.

109. Suddenly, Dr. Laskowski picked up Ms. Bahnan and lifted her into the air, grabbing her backside as he did so.

110. Ms. Bahnan was shocked and immediately said “Put me down!”

111. Ms. Bahnan moved away from Dr. Laskowski to sit at her assigned table.

112. Dr. Laskowski went to the bar, where Ms. Bahnan observed him drinking heavily and frequently staring over at her.

113. Ms. Bahnan did her best to ignore Dr. Laskowski and speak with the colleagues at her table.

114. Later in the evening, Ms. Bahnan and some female colleagues were taking photos in a photobooth set up for the event.

115. Dr. Laskowski suddenly inserted himself into the photobooth, positioning himself right next to Ms. Bahnan and forcing her to include him in the group shot.

116. Shortly thereafter, Ms. Bahnan was dancing with some colleagues.

117. By this time in the evening, Dr. Laskowski was visibly intoxicated and slurring his words.

118. On information and belief, Dr. Laskowski was the surgeon on backup call that night, meaning that he had to be ready to respond to a patient emergency at the Hospital and was not supposed to be drinking at all, let alone drinking to the point of intoxication.

119. On information and belief, Hospital administrators, including Chair of the Department of Surgery Dr. Fretwell and Assistant Vice President Lourdes Goldenberg, saw Dr. Laskowski was intoxicated and behaving inappropriately at the party, yet took no action to discipline or stop him, despite knowing he was on backup call.

120. Dr. Laskowski repeatedly tried to force Ms. Bahnan to dance with him, including grabbing her arms more than once.

121. Ms. Bahnan declined, saying over and over: “No, I’m good.”

122. Dr. Laskowski then came up behind Ms. Bahnan, grabbed her arms from behind, and pressed himself up close to her.

123. Ms. Bahnan turned around, removed his hands from her body, and repeated: “I’m good. I’m all set.”

124. But Dr. Laskowski did not listen.

125. He came up behind Ms. Bahnan again and grabbed her backside.

126. Ms. Bahnan said: “You really need to stop doing that. That can’t happen here, especially at a work function.”

127. Dr. Laskowski responded: “Oh that can’t happen here, so I’m allowed to touch you outside of a work function?”

128. Ms. Bahnan said: “No, that can’t happen anywhere. That’s inappropriate.”

129. Dr. Laskowski then approached another Jamaica Hospital doctor, Dr. Benjamin Hartley, and told him he wanted to “fuck” Ms. Bahnan “so hard.”

130. Ms. Bahnan went to speak to Dr. Hartley’s wife and told her that Dr. Laskowski kept trying to dance with her and was touching her, that she had told him repeatedly to stop, and that he was creeping her out.

131. Dr. Hartley’s wife told Ms. Bahnan to keep her distance from Dr. Laskowski.

132. Ms. Bahnan left the dance floor.

133. Dr. Laskowski followed her, put his hands up in the air, and sarcastically said: “Not going to touch you. No moves here.”

134. Ms. Bahnan said: “Thank you.”

135. Ms. Bahnan then went to speak to another doctor.

136. Again, Dr. Laskowski followed her.

137. He said: “I’m sorry, am I interrupting here?”

138. Dr. Laskowski then grabbed Ms. Bahnan’s backside for *a third time*.

139. Ms. Bahnan asked Dr. Laskowski to step out of the venue into the hallway outside, saying “I need to have a word outside with you.”

140. In the hallway, Ms. Bahnan told Dr. Laskowski: “Nothing is happening here. Nothing sexual is going to happen here. I have boundaries and you need to stop touching me. If you keep doing it, I am going to report you.”

141. Dr. Laskowski angrily responded: “Fuck your boundaries.”

142. Dr. Laskowski appeared extremely intoxicated, and he was yelling and towering over Ms. Bahnan.

143. Ms. Bahnan reminded him: “We’re at a work function and I have professional boundaries.”

144. Despite being repeatedly and unambiguously told his advances were unwelcome, Dr. Laskowski propositioned Ms. Bahnan yet again, saying: “So let’s leave and go have fun together.”

145. Ms. Bahnan responded: “That is never happening.”

146. Ms. Bahnan decided she had to leave the party to get away from Dr. Laskowski.

147. She went to get her coat.

148. Again, Dr. Laskowski followed her, demanding to know where she was going.

149. Ms. Bahnan responded she was going home.

150. Dr. Laskowski insisted he would “walk her out.”

151. Ms. Bahnan declined but Dr. Laskowski ignored her and followed her to her Uber.

152. Dr. Laskowski demanded Ms. Bahnan text him when she got home.

153. Fearful of further angering him given his position of authority at the Hospital where she worked, Ms. Bahnan agreed.

154. While Ms. Bahnan was in the Uber home, Dr. Hartley and his wife called her to make sure she was okay and had safely escaped Dr. Laskowski.

155. When Ms. Bahnan got home, she politely texted Dr. Laskowski as he had required, given that she was still going to have to work under his authority at Jamaica Hospital.

156. While fearful of offending Dr. Laskowski, Ms. Bahnan wanted to re-emphasize what she had said at the party and make clear she did not want him to touch her, so she texted him: “I respect you respecting my boundaries so thank you.”

157. Consistent with what he had said at the party, Dr. Laskowski texted back: “I try to be a gentleman. Fail often. But try nonetheless. Also, your boundaries fucking suck by the way!”

158. On or about January 7, 2025, Ms. Bahnan had to work a previously-scheduled shift at Jamaica Hospital.

159. When Ms. Bahnan saw Dr. Laskowski in a hallway, he stared inappropriately at her, and then came over and stood improperly close to her.

160. Ms. Bahnan felt uncomfortable.

161. He spoke with her for several minutes.

162. Then, he put his hand on her arm and continued to speak with her.

163. Ms. Bahnan was finally able to get away from him by claiming she had to see a patient.

164. Late the next night, Dr. Laskowski texted Ms. Bahnan a photo of the photobooth shot he had forced himself into at the holiday party, clearly using it as an excuse to try to initiate unprofessional texts with Ms. Bahnan.

165. Ms. Bahnan felt pressured to respond in a friendly manner given Dr. Laskowski's position of authority at Jamaica Hospital, but delayed doing so until the next day.

166. Dr. Laskowski immediately texted back.

167. Ms. Bahnan eventually sent him a meme of "Let it Be," the Beatles' song, emphasizing, again, that he should leave her alone.

168. Although Dr. Laskowski sent several more texts thereafter, Ms. Bahnan did not respond.

169. Because Ms. Bahnan was uncomfortable with Dr. Laskowski's behavior, she avoided working as many shifts as she would typically have worked at Jamaica Hospital because she did not want to see him again.

D. Jamaica Hospital Does Not Discipline Dr. Laskowski

170. On information and belief, at the same 2024 holiday party, Dr. Laskowski also repeatedly grabbed a Hospital female administrative assistant by the hair and pulled her head towards his crotch, simulating oral sex, and said "I've been wanting to do this for a while."

171. In late February 2025, Dr. Hartley reported Dr. Laskowski's sexual harassment of Ms. Bahnan at the holiday party to Dr. Fontana, who was Ms. Bahnan's supervisor.

172. Dr. Fontana was shocked. Learning that Dr. Laskowski had sexually harassed other women, especially a subordinate like Ms. Bahnan, made her concerned that Dr. Laskowski

was preying on many women and making Jamaica Hospital unsafe for her, Ms. Bahnan, and other female employees as well.

173. Indeed, when Ms. Bahnan told a colleague about how Dr. Laskowski had treated her, the colleague texted her: “I have been eye fucked by laskos [Laskowski] multiple times.”

174. Ms. Bahnan understood this to mean that Dr. Laskowski had stared in a similarly inappropriate way at this other woman as he had at her and texted back: “Ya he’s repulsive. It’s awful.”

175. Dr. Fontana spoke with Ms. Bahnan, who reported to her what Dr. Laskowski had said and done to her at the party.

176. Dr. Fontana encouraged Ms. Bahnan to report Dr. Laskowski to Human Resources and offered to join her in doing so, since she had also been sexually harassed by Dr. Laskowski.

177. Ms. Bahnan was afraid that reporting to Human Resources would expose her to retaliation.

178. But hearing that Dr. Laskowski had also sexually harassed Dr. Fontana made her concerned he was doing, or would do, the same to other female employees at Jamaica Hospital.

179. On May 22, 2025, both Ms. Bahnan and Dr. Fontana filed written complaints of sexual harassment against Dr. Laskowski with the Hospital’s Human Resources department.

180. Shortly thereafter, both Dr. Fontana and Ms. Bahnan participated in interviews with Human Resources, in which they described how Dr. Laskowski had sexually harassed them.

181. Dr. Fontana asked Human Resources to ensure Dr. Laskowski stayed out of her operating room and meetings and to move his parking spot away from hers.

182. On information and belief, following this meeting, Human Resources took no action whatsoever.

183. On June 13, 2025, nearly a month after submitting her report, Dr. Fontana wrote to the Hospital's Human Resources officials to follow up, emphasizing that Dr. Laskowski had "come into my OR and loitered outside the room for unclear reasons," that he was still coming to her weekly meetings, and that their parking spaces remained close by and she had run into him in the garage. She emphasized that "these forced interactions in relatively small settings are even more distracting and distressing."

184. Human Resources again took no corrective action.

185. In September 2025, Dr. Laskowski's parking spot was eventually moved, but, on information and belief, Human Resources took no action to keep him out of Dr. Fontana's operating room or meetings or otherwise discipline him or protect her.

186. Around the same time, months after interviewing Ms. Bahnan, Human Resources had taken no action on her complaint, either.

187. Instead, a Human Resources official called and asked Ms. Bahnan what consequences *she* wanted imposed on Dr. Laskowski.

188. Ms. Bahnan asked Human Resources to ensure Dr. Laskowski received training and did remediation of some kind.

189. Neither Dr. Fontana nor Ms. Bahnan ever received any further update from Human Resources as to the outcome of any investigation that might have been conducted or any training or any discipline imposed on Dr. Laskowski.

190. On information and belief, Jamaica Hospital conducted no real investigation.

191. On information and belief, Jamaica Hospital imposed no effective or meaningful discipline on Dr. Laskowski.

192. Instead, after Dr. Fontana voiced her concern at the Hospital's abject inaction for five months after Dr. Fontana's and Ms. Bahnan's initial meetings with Human Resources, Jamaica Hospital, and in particular, the Chair of the Department of Surgery, Dr. Fretwell, retaliated against Dr. Fontana, fabricating false accusations against her about delayed procedure start times in an attempt to suspend her start time privileges.

193. Dr. Fontana was eventually forced to resign from Jamaica Hospital due to the hostile working environment for women there.

194. Ms. Bahnan was forced to work fewer shifts at Jamaica Hospital because she was afraid of Dr. Laskowski and did not feel safe at the Hospital. She lost the income she would otherwise have earned but for Jamaica Hospital's hostile work environment.

195. The hostile work environment at Jamaica Hospital also forced another female surgeon to resign in December 2025 after the Hospital allowed Dr. Laskowski to use rude and obscene language towards her, yell at her, and engage in blatant insubordination towards her.

196. Dr. Laskowski does not treat male surgeons in this same manner.

197. Again, this woman reported Dr. Laskowski's misconduct to the leadership and administration of Jamaica Hospital.

198. Again, Jamaica Hospital took no action to effectively discipline Dr. Laskowski or protect women at the Hospital from him.

199. Dr. Laskowski then repeatedly called this female surgeon's new employer and defamed her and her professional reputation in an attempt to get her new employer to rescind her offer.

200. On information and belief, Jamaica Hospital's Assistant Vice President Lourdes Goldenberg joined this campaign of retaliation and defamation against this female surgeon, falsely telling another hospital that she had been fired.

201. Jamaica Hospital continues to employ Dr. Laskowski to this day.

202. On information and belief, Dr. Laskowski continues to this day to sexually harass female subordinates at Jamaica Hospital.

203. For example, as recently as April 2026, Ms. Bahnan heard that Dr. Laskowski told a female surgery resident at Jamaica Hospital that he could see her thong through her scrubs.

204. On information and belief, Jamaica Hospital plans to promote Dr. Laskowski to the position of Chair of the Department of Surgery.

E. Jamaica Hospital's Hostile Work Environment Has Damaged Ms. Bahnan

205. As a result of Defendants' conduct, Ms. Bahnan suffered and continues to suffer general anxiety and mental anguish.

206. After Dr. Laskowski sexually harassed Ms. Bahnan at the holiday party, and after she filed a report with Human Resources and never heard from the Hospital that any steps were taken to protect her, Ms. Bahnan worked fewer shifts at Jamaica Hospital and lost the income she would otherwise have earned but for Jamaica Hospital's hostile work environment.

**FIRST CAUSE OF ACTION
Against Defendants Jamaica Hospital and MediSys
Discrimination, Sexual Harassment, Hostile Work Environment
in Violation of New York State Human Rights Law
N.Y. Executive Law §§ 296 *et seq.***

207. Ms. Bahnan repeats and realleges the above paragraphs as if fully set forth herein.

208. Defendants Jamaica Hospital and MediSys discriminated against Ms. Bahnan with sexist conduct and created a hostile work environment on the basis of her gender, in

violation of the New York State Human Rights Law (“NYSHRL”), N.Y. Exec. Law §§ 296 *et seq.*

209. Defendants Jamaica Hospital and MediSys subjected Ms. Bahnan to “inferior terms, conditions or privileges of employment” and “treated [her] less well than” male employees because of her gender, in violation of the NYSHRL.

210. Dr. Laskowski repeatedly groped Ms. Bahnan’s backside and made discriminatory and sexual remarks to, and about, Ms. Bahnan.

211. Dr. Laskowski did not grope male employees or make discriminatory remarks about male employees.

212. In response to Ms. Bahnan’s and other women’s reports to Human Resources, Defendants Jamaica Hospital and MediSys did nothing to effectively discipline Dr. Laskowski.

213. As a result of Defendants Jamaica Hospital’s and MediSys’s discrimination against Ms. Bahnan on the basis of her gender, she is entitled to compensatory damages and attorneys’ fees and costs under the NYSHRL.

214. Defendants Jamaica Hospital’s and MediSys’s actions in violation of NYSHRL were intentional, with malice, and/or showed deliberate, willful, wanton, and reckless indifference to Ms. Bahnan’s civil rights, for which she is entitled to an award of punitive damages.

SECOND CAUSE OF ACTION
Against All Defendants
Discrimination, Sexual Harassment, Hostile Work Environment
in Violation of the New York City Human Rights Law
N.Y.C. Admin. Code §§ 8-107 *et seq.*

215. Ms. Bahnan repeats and realleges the above paragraphs as if fully set forth herein.

216. Defendants discriminated against Ms. Bahnan with sexist conduct and created a hostile work environment for her on the basis of her gender, in violation of the New York City Human Rights Law (“NYCHRL”), N.Y.C. Admin. Code §§ 8-107 *et seq.*

217. Defendant Dr. Laskowski repeatedly groped Ms. Bahnan’s backside and made discriminatory and sexual remarks to, and about, Ms. Bahnan.

218. Defendant Dr. Laskowski did not grope male employees or make discriminatory remarks about male employees.

219. In response to Ms. Bahnan’s and other women’s reports to Human Resources, Defendants Jamaica Hospital and MediSys did nothing to effectively discipline Defendant Dr. Laskowski.

220. As a result of Defendants’ discrimination against Ms. Bahnan on the basis of her gender, she is entitled to compensatory damages and attorneys’ fees and costs under the NYCHRL.

221. Defendants’ actions in violation of NYCHRL were intentional, with malice, and/or showed deliberate, willful, wanton, and reckless indifference to Ms. Bahnan’s civil rights, for which she is entitled to an award of punitive damages.

222. Ms. Bahnan has not filed any other civil or administrative action alleging an unlawful discriminatory practice with respect to the allegations of discrimination which are the subject of this Complaint. Pursuant to N.Y.C. Admin. Code § 8-502(c), Ms. Bahnan is providing the New York City Human Rights Commission notice of her claims.

PRAYER FOR RELIEF

WHEREFORE, Ms. Bahnan respectfully requests that the Court grant her the relief requested as follows:

- A. Compensatory damages in an amount to be determined at trial;
- B. Punitive damages in an amount to be determined at trial;
- C. An award of attorneys' fees and costs incurred in this action pursuant to N.Y.C. Admin. Code § 8-120(a) and N.Y. Exec. Law § 297(10), and to the fullest extent otherwise permitted by law; and
- D. Such other and further relief as the Court may deem just and proper.

Dated: June 23, 2026
New York, New York

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/s/

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