

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

----- X JANE DOE, <i>Plaintiff,</i> -against- THE CITY OF NEW YORK, COMMISSIONER JESSICA TISCH, in her individual and official capacities, FORMER COMMISSIONER EDWARD CABAN, in his individual and official capacities, FORMER CHIEF JEFFREY MADDREY, in his individual and official capacities, FORMER DEPUTY INSPECTOR DAWIT FIKRU, in his individual and official capacities, and JOHN and JANE DOES 1-100, said names being fictitious and intended to represent individual officers, members, agents and/or employees of the New York City Police Department whose names and identities are not yet known to Plaintiff, in their individual and official capacities, <i>Defendants.</i> ----- X	Index No. _____ AFFIRMATION OF a/k/a “JANE DOE”
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I, [REDACTED] a/k/a “JANE DOE”, pursuant to CPLR 2106, affirm under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the following is true, and I understand that this document may be filed in an action or proceeding in a court of law:

1. I am the Plaintiff in the above-captioned matter. I submit this Affirmation in support of my motion to seal and restrict access to documents that would identify me, and for leave to proceed in this matter under a pseudonym.

2. The sexual assault and abuse perpetrated upon me by my abuser, a now-former NYPD Captain, were extremely traumatic events in my life. As detailed in my Verified Complaint, I endured years of stalking, sexual harassment, and violent physical, psychological, and sexual abuse, and I have suffered tremendously as a result, including severe mental anguish and emotional distress, humiliation, embarrassment, and shame.

3. The abuse I suffered was of the most intimate and personal nature. Over the course of approximately two and one-half years, my abuser repeatedly touched me in a sexual manner without my consent and over my objection, including grabbing my breasts, touching my legs and body, and forcing his body against mine, and, on more than one occasion, threatened to rape me. He also subjected me to repeated sexually degrading verbal abuse.

4. For years, and without my knowledge or consent, my abuser also secretly photographed and recorded me, including while I was in a sports bra or working out during video calls he pressured me to join, and amassed a collection of these intimate images. He admitted that he kept them for his own sexual gratification, and, after claiming that he had deleted them, told me that he had used a software application to recover them. He repeatedly threatened to send these images to the tens of thousands of members of the NYPD, and to my husband and children, in order to blackmail me and keep me silent.

5. My abuser also repeatedly threatened that, if I ever reported what he had done, he would never rest until he destroyed me, and that he would have nothing to lose and nothing but time to come after me.

6. I fear that if I am forced to proceed in this action under my own name, I will be subjected to further public shaming, harassment, humiliation, and re-traumatization, and that the

deeply private and sexual details of what was done to me will be permanently and publicly associated with my name.

7. I have particular reason to fear such harm because the NYPD has already demonstrated its willingness to use my private information against me. After it learned that I was a victim of domestic violence and stalking, the NYPD circulated my official photograph, together with false and defamatory narratives of a sexual nature about me, including the false claim that I had engaged in sexual relationships with colleagues, to tens of thousands of members of the Department through its electronic communication forums, in a manner calculated to humiliate me and to destroy my professional and personal reputation.

8. My fear of being publicly identified is further heightened because I am a Palestinian, Arab, and Muslim woman. The false and sexualized rumors that have been spread about me carry an especially grave risk to my safety, my reputation, and my family, and I fear that permanently attaching the intimate details of this action to my legal name would compound that danger.

9. The NYPD also disclosed confidential information concerning my cooperation with criminal investigators to my abuser, placing me in further danger, particularly because the NYPD had, at the same time, confiscated all of my firearms.

10. Given this history, I have legitimate concerns that if I am required to proceed under my legal name, I will be exposed to continued harm, harassment, and danger, and will be made to suffer further pain and suffering beyond that which has already been inflicted upon me.

WHEREFORE your Affirmant respectfully prays for an Order directing:

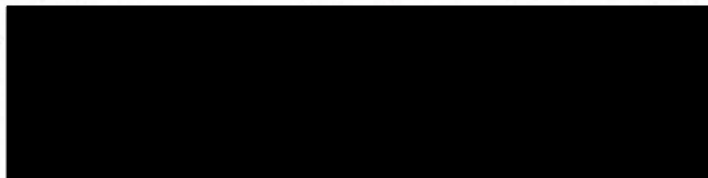
- (a) that the identity of the Plaintiff hereto be sealed and withheld from all pleadings, papers, affidavits, exhibits, and evidence filed with this Court in the above-titled matter; the judgments, orders and decisions of this Court in the above-entitled

matter; and the transcripts of hearings held in the above-captioned matter be drafted using the pseudonym listed in the caption or otherwise redacted prior to filing on any public docket; and

- (b) that any of the aforesaid pleadings, papers, affidavits, exhibits, evidence, judgments, orders, decisions and transcripts of hearings filed with this Court in this action that bear the true identity of the Plaintiff be kept in the custody of the Clerk of this Court or the County Clerk at the County Courthouse for the County of the Bronx; and
- (c) that the Clerk of this Court or the County Clerk not permit any person other than a party or his counsel to appear herein to copy, examine, or peruse the aforesaid pleadings, papers, affirmations, exhibits, evidence, judgments, orders, decisions, and transcripts of hearings that contain the unredacted name of the Plaintiff; and
- (d) that the County Clerk enter the caption of the above-entitled proceeding in the current minute books and indices of actions and proceedings maintained in his office under the title of “JANE DOE v. THE CITY OF NEW YORK, COMMISSIONER JESSICA TISCH, FORMER COMMISSIONER EDWARD CABAN, FORMER CHIEF JEFFREY MADDREY, FORMER DEPUTY INSPECTOR DAWIT FIKRU, and JOHN and JANE DOES 1-100”; and
- (e) that all proceedings had herein, and all papers filed in connection with the instant matter, utilize the pseudonym stated in the caption of this action as defined in the Complaint; and
- (f) granting such other and further relief as the Court deems to be just and proper.

Dated: 07/08/2026,
2026

New York, NY



a/k/a "JANE DOE"