

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

-----	X	
DR. NATASHA ANUSHRI ANANDARAJA, DR.	:	Index No.
HOLLY ATKINSON, MARY CALIENDO, and		
HUMALE KHAN		
	Plaintiffs,	:
		:
		Summons Filed:
-against-	:	<u>SUMMONS</u>
ICAHN SCHOOL OF MEDICINE AT MOUNT	:	
SINAI, DR. PRABHJOT SINGH, DR. DENNIS S.		
CHARNEY, BRUNO SILVA, and DAVID		
BERMAN		
	Defendants.	:
-----	X	

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 plaintiffs within twenty (20) days after 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.

Plaintiffs designate New York County as the place of trial.

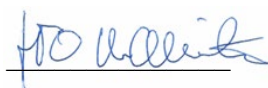
The basis of venue is CPLR § 503(a) which is where at least one party resides and where a substantial part of the events or omissions giving rise to the claims occurred.

Dated: October 24, 2022

Maidenhead, UK

Respectfully submitted,

McAllister Olivarius

by: 

Dr. J. F. O. McAllister
McAllister Olivarius
641 Lexington Avenue
13th Floor
New York, NY 10022
(212) 433-3456
jmcallister@mccolaw.com

Attorneys for Plaintiffs

TO:

Icahn School of Medicine at Mount Sinai
1 Gustave L. Levy Pl.
New York, NY 10029

Dr. Prabhjot Singh
1 Gustave L. Levy Pl.
New York, NY 10029

Dr. Dennis S. Charney
1 Gustave L. Levy Pl.
New York, NY 10029

Bruno Silva
205 Water St. Apt. 3M
Brooklyn, NY 11201-1254

David Berman
323 Woodbury Rd.
Cold Spring Harbor, NY 11724-2230

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

-----X

DR. NATASHA ANUSHRI ANANDARAJA,	:	Index No. [NUMBER]/[YEAR]
DR. HOLLY ATKINSON,	:	
MARY CALIENDO, and	:	
HUMALE KHAN,	:	
	:	
Plaintiffs,	:	[Hon. [ASSIGNED JUDGE]]
	:	
-against-	:	<u>COMPLAINT</u>
	:	
ICAHN SCHOOL OF MEDICINE AT MOUNT	:	
SINAI,	:	
DR. PRABHJOT SINGH,	:	
DR. DENNIS S. CHARNEY,	:	
BRUNO SILVA, and	:	
DAVID BERMAN,	:	
	:	
Defendants.	:	

-----X

Plaintiffs DR. NATASHA ANUSHRI ANANDARAJA, DR. HOLLY ATKINSON, MARY CALIENDO, and HUMALE KHAN (collectively, “Plaintiffs”), by their attorneys McAllister Olivarius, bring this action against DR. PRABHJOT SINGH, DR. DENNIS S. CHARNEY, BRUNO SILVA, DAVID BERMAN, and ICAHN SCHOOL OF MEDICINE AT MOUNT SINAI (collectively, “Defendants”), and allege as follows:

NATURE OF THE ACTION

1. This action asserts claims for sex, age, race, religion and national origin discrimination and retaliation under the New York State Human Rights Law, Executive Law § 290, *et seq.* (“NYSHRL”) and the New York City Human Rights Law, NYC Admin. Code § 8-107 (“NYCHRL”), and breach of contract.

2. Plaintiffs are former employees of the Icahn School of Medicine at Mount Sinai (“the Icahn School of Medicine”), run by Mount Sinai Health System, Inc. (“MSHS”). MSHS and the Icahn School of Medicine are collectively referred to as “Mount Sinai.”

3. This lawsuit centers on the Arnhold Institute for Global Health (“AIGH” or “the Institute”) within the Icahn School of Medicine, and the management of the Institute by its inaugural Director, Defendant Dr. Prabhjot Singh (“Singh”). Prior to his arrival, Mount Sinai Global Health (“MSGH”), as it was then known, was flourishing. Its core staff included Plaintiffs Dr. Natasha Anushri Anandaraja (“Anandaraja”) and Dr. Holly Atkinson (“Atkinson”), who helped build this pioneering and internationally recognized program in global health.

4. The Arnholds, a prominent banking family in New York City widely known for their philanthropy, were early funders of MSGH and, impressed with its success, made a \$12.5 million commitment to expand the team’s work in 2014, specifically in the area of education and training. Defendant Dr. Dennis S. Charney (“Charney”), the Anne and Joel Ehrenkranz Dean of the Icahn School of Medicine and President for Academic Affairs of MSHS, sought a “transformational” Director for this new era, and a distinguished search committee recommended an accomplished academic leader, Dr. Steffanie Strathdee (“Strathdee”), Associate Dean of Global Health Sciences at the University of California-San Diego. But Charney subverted the search process and on his own named Singh, then a 32-year-old still completing his residency at Mount Sinai, simultaneously elevating him to become Associate Professor and Vice Chair of Medicine for Population Health at the Icahn School of Medicine.

5. Singh declared that he wanted to work only with young people. He promptly set about denigrating and humiliating the Institute’s existing employees who had been responsible for its success, most of them older women. He was abusive, dismissive and hostile. He showed no

interest in anything he could not claim credit for. He would not even read short briefing papers on significant programs in developing countries that the Institute had taken years to establish. He denounced what he termed the female “legacy staff” for multiple, unpredictable reasons. He would accuse them of failing to accomplish tasks he had not asked them to do, and when they did what he asked, he would deride them for not doing something else.

6. Extremely charming when he wished to be, excellent at “managing up” and making stirring pitches to donors, Singh managed to cement his status as Charney’s protégé as he turned AIGH into an unhappy and tumultuous workplace, particularly for women. He was a brilliant “gaslighter,” skilled at convincing people his abrupt shifts in direction were nothing of the kind, or that whatever he was angry about was their fault. Employees began taking notes during conversations to reassure themselves they were not crazy when Singh tried to blame them later for doing what Singh had directed. His goal was apparently to demoralize the “legacy staff” so thoroughly that they would leave “voluntarily” or be set up to fail. In this he was largely successful: by 2018, after they suffered increasing insomnia, depression, and terror about going to work, 13 women were gone, many of them legacy staff. The people he sought to hire into leadership positions were overwhelmingly young men. They generally had far less experience and capability, but still displaced older women faculty from their leadership positions, were given more prestigious titles, and were paid more – in some cases substantially more.

7. Singh’s oppression of those he perceived as threatening, or inferior and weak, continued after the “legacy staff” were forced out, and women were his particular targets. He skipped over them at meetings where men of equal importance got to talk freely. When women did speak, he ignored their contributions. Plaintiff Mary Caliendo (“Caliendo”) often heard Singh describe normal differences of opinion between female staff as “girl cat fights.” He ordered them

to cut off longstanding professional contacts. While Singh often bad-mouthed men behind their backs, he did not mount comprehensive attacks on their reputations or careers. With his female targets, however, he worked methodically to attack their morale and confidence, and to destroy their reputations and careers. And the culture he created enabled imitators.

8. Defendant David Berman (“Berman”), Singh’s chief of staff, was known for screaming furiously at women at AIGH, heard by everyone in the office, which Singh nonchalantly ignored. Defendant Bruno Silva (“Silva”), an employee of Mount Sinai, regularly called women “bitches” and “cunts”—these were fellow employees, donors, women from other parts of Mount Sinai—and made constant disparaging remarks about their appearance. Singh did nothing to curb him.

9. Silva also repeatedly slurred Plaintiff Humale Khan (“Khan”), who is of Pakistani origin and Muslim. He made denigrating comments when Khan observed Muslim customs, said that the office they shared “smelled like shit” or “smelled like curry,” and described him and his family as “backward” and “weird.” This behavior was flagrant and widely known in the office but Singh did nothing to stop it.

10. Singh’s “tough guy” management style imitated that of Dean Charney, Singh’s boss, to whom he was beholden. Charney is well-known for proclaiming his own strength and toughness under pressure, holding an annual push-up contest at Mount Sinai that he always wins, and for losing his temper theatrically. Charney’s exchanges with Strathdee, the candidate to run AIGH recommended by the search committee, included abusive language; in one e-mail, he called her an “IDIOT” in red capital letters. She said she had never been so rudely treated in her life and would never work for such a bully—and she was not even a subordinate beholden to him, but a distinguished job candidate being recruited by Mount Sinai.

11. Dishonesty pervaded Singh's management style. Both with legacy employees and new ones, he proved himself untrustworthy. He had inflated his CV to get the job to begin with and, as Director, lied to donors including the United States Agency for International Development ("USAID") by falsely claiming that AIGH under his leadership had deployed a wonderful high-tech system for mapping health data in rural communities when the project was still a vague collection of specifications and unfinished code. Good employees responsible for the project who feared they were being used to deceive donors left AIGH. Singh allocated grant money to projects differently from what AIGH had agreed with donors. Employees knew they had to go along or get fired. The "cult of Singh" that brooked no dissent was just as conducive to the abuse of female employees as to donors.

12. To all of this, Mount Sinai's approach has been to "see no evil." A half-hearted and pre-determined 2018 investigation by Mount Sinai HR, which was prompted by complaints from several "legacy staff," "found" that Singh merely rubbed people the wrong way but had done nothing fundamentally wrong. He received no punishment. He was thought to deserve another chance, though his victims did not get one. The fact that he picked overwhelmingly on older women was found not to be evidence of sex or age discrimination because he was also mean to a few men. An Oversight Committee was created to help him manage better, but met infrequently and did not noticeably change things.

13. In fact, the culture that allowed Singh to thrive was set at the top, by the Dean of the Medical School for the last 15 years, Charney. Charney is intelligent and talented, but also has a widespread reputation at Mount Sinai as a bully. "I like it when people are afraid of me," he has said. The culture follows his lead: as Singh demonstrated, the main model for success, in the words of a senior doctor, is to "smile up and shit down." Charney's own head of HR was concerned

at the “casual” way he installed Singh in a key position without following standard procedure, and the HR department heard increasing complaints from AIGH staff about Singh’s erratic, harsh and misogynistic behavior. But because Singh was Charney’s rising star and no one wanted to provoke Charney’s disfavor, the problems Singh created were allowed to multiply. The HR investigation into Singh made necessary by his flagrant misconduct resulted in the Oversight Committee but no punishment for Singh and no redress for the complainants – the outcome Charney decided upon.

14. It turns out that Charney’s management style is oppressive to many people at Mount Sinai. In the wake of the Complaint in a related case, *Atkinson et al. v. Mount Sinai Health System et al.*, Civil Action No. 1:19-cv-03779-VSB-JW (“SDNY Litigation”), hundreds of Mount Sinai faculty alumni, students, and even current faculty who ultimately report to Charney, including some very senior ones, signed public letters backing Plaintiffs for shining a spotlight on what the letters described as an “abusive culture” that Charney had created and nourished.

15. Following the public outcry, Charney sent an e-mail to all Mount Sinai staff, faculty and students on July 3, 2019, praising Singh’s “dedicated work” and “devotion to [the Icahn School of Medicine’s] mission and success,” but also announcing that Singh had “chosen to step down.” Nevertheless, Singh remained on the faculty as an Associate Professor of Health System Design and Global Health, and of Medicine. The results of Mount Sinai’s internal investigation into Singh (which had substantial shortcomings discussed below) have never been made public, but the fact that it resulted in appointing the Oversight Committee to supervise him cannot be construed as an unalloyed endorsement.

16. The result of the internal investigation exemplifies the double standards, sexism and ageism that pervade this case. Singh’s victims got no second chances: they were forced out or fired, their previously stellar careers in tatters, some needing to see counsellors and take

antidepressants and anti-anxiety medications to deal with the stress and humiliation he heaped on them. They did nothing wrong, continue to suffer, and have received no apology or redress; their professional lives have been upended and stunted. Singh, aided by Charney, Berman and Silva, left a trail of destruction in his wake, yet was permitted to step down on favorable terms, still employed by Mount Sinai, with a warm, public endorsement from Charney.

PARTIES

17. Dr. Natasha Anushri Anandaraja is an individual domiciled in the State of New York. At all material times, Anandaraja was employed by Icahn School of Medicine at Mount Sinai.

18. Dr. Holly Atkinson is an individual and is domiciled in New York. At all material times, Atkinson was employed by Icahn School of Medicine at Mount Sinai.

19. Mary Caliendo is an individual and is domiciled in the State of New York. At all material times, Caliendo was employed by Icahn School of Medicine at Mount Sinai.

20. Humale Khan is an individual and is domiciled in the State of New York. At all material times, Khan was employed by Icahn School of Medicine at Mount Sinai.

21. Icahn School of Medicine at Mount Sinai is a private medical school, duly organized and existing under the laws of New York, with its principal place of business at One Gustave L. Levy Place, New York, New York, 10029. Its ultimate parent is MSHS, which also encompasses eight hospital campuses in the New York metropolitan area.

22. Icahn School of Medicine at Mount Sinai is one of the top medical schools in United States and is led by Charney, the Anne and Joel Ehrenkranz Dean and President for Academic Affairs at MSHS.

23. Dr. Prabhjot Singh is an individual and is domiciled in the State of New York. At all material times, Singh was employed by Mount Sinai.

24. Dr. Dennis S. Charney is an individual and is domiciled in the State of New York. At all material times, Charney was employed by Mount Sinai.

25. Bruno Silva is an individual and was domiciled in the State of New York during the relevant period. At all material times, Silva was employed by Mount Sinai.

26. David Berman is an individual and is domiciled in the State of New York. At all material times, Berman was employed by Mount Sinai.

JURISDICTION AND VENUE

27. This Court has general jurisdiction in this matter pursuant to CPLR § 301 because Defendants are located in New York, reside in New York, and/or transact substantial business in New York.

28. Venue is proper in New York County because, *inter alia*, Defendant Icahn School of Medicine maintains its principal place of business in New York County, and a substantial part of the events or omissions giving rise to this action occurred within New York County.

TIMELINESS

29. On April 26, 2019, Plaintiffs together with four other plaintiffs (collectively, “SDNY Plaintiffs”) filed the SDNY Litigation in the United States District Court, Southern District of New York (“SDNY Complaint”).

30. The SDNY Plaintiffs subsequently filed a First Amended Complaint in the SDNY Litigation on August 6, 2019. On September 5, 2019, Defendants in that case filed a partial motion to dismiss the First Amended Complaint, which Plaintiffs opposed.

31. On January 14, 2022, the SDNY Court issued an Order granting in part and denying in part the Defendants' partial motion to dismiss ("January 2022 Order"). Specifically, the Court dismissed all claims asserted by Atkinson, Anandaraja, Khan and Caliendo, leaving them no surviving claims in SDNY.

32. On February 10, 2022, the Plaintiffs in the SDNY Litigation filed a Motion for Certification Pursuant to Federal Rule of Civil Procedure 54(b), moving the Court for an order directing entry of judgment on the claims dismissed by the Court in the January 2022 Order. On April 22, 2022, the Court granted the motion in part and denied it in part. On April 25, 2022, the clerk of SDNY entered final judgment pursuant to Rule 54(b) against Atkinson, Anandaraja, Caliendo and Khan.

33. The Plaintiffs bring this action within six months of April 25, 2022 and have satisfied all requirements under CPLR 205(a).

34. Plaintiffs have fully exhausted all applicable administrative remedies, and all prerequisites and conditions precedent of the filing of this action have been satisfied.

STATEMENT OF FACTS

A. EVOLUTION OF GLOBAL HEALTH AT MOUNT SINAI

35. In the mid-2000s, Dr. Ramon Murphy ("Murphy"), an eminent pediatrician, led a group of physicians to build a unique Global Health Training Program at Mount Sinai with two primary objectives: "to train, mentor, and equip U.S. medical students to pursue careers in global health, and to increase local health care capacity in medically under-resourced areas around the world."

36. Murphy's core staff at the time included Anandaraja, who was in charge of developing the educational program. In its first year, the group presented a plan to build a global health program at Mount Sinai, which received funding from the Mulago Foundation, a fund supported by the Arnhold family. An independent advisory board was developed that included many successful and influential philanthropists, academics and doctors. It helped raise additional funds for the Global Health Group and advised it on its mission and goals as it grew.

37. Over time, the program became an integral part of Mount Sinai. In 2010, Mount Sinai recognized this by creating a new position of Dean for Global Health, with Dr. Phil Landrigan ("Landrigan") its inaugural appointee. The program expanded from focusing on student education to additional research and human rights initiatives, under the name Mount Sinai Global Health. MSGH expanded its staff to include Atkinson, who resurrected and developed a human rights program and was appointed Director of the Human Rights Program, and Elena Rahona ("Rahona"), who was Program Manager and later Administrative Director.

38. By 2014, MSGH had become one of the leading global health centers in the country and a crown jewel of Mount Sinai. Its medical student training program, including a series of "InFocus courses" taught by Anandaraja and Atkinson for Mount Sinai's Department of Medical Education, reached 280 students per year receiving praise from students and lecturers, and high evaluation scores. It made Mount Sinai one of the first medical schools in the United States to integrate global health education and human rights into its mandatory core curriculum. MSGH also created and implemented advanced global health training programs for Masters of Public Health students and resident doctors in various medical specialties.

39. As a component of its comprehensive training program, MSGH continued strengthening its practical hands-on training opportunities at international partner sites, including

Summer Global Health Projects which, between 2007 and 2015 accommodated 223 student and 94 faculty placements at up to 17 sites across the world, giving them valuable first-hand experience of global health principles in practice.

40. Early evaluations showed that 64% of Mount Sinai Global Health Residents said that MSGH's educational programs influenced the way they had ranked Mount Sinai for residency and 71% of surveyed student alumni reported that their global health experience at Mount Sinai, run by MSGH, made them more competitive during their residency applications. More importantly, in 2015, 91% of surveyed Mount Sinai Global Health Residency Track graduates reported they were working with underserved populations in the U.S., and 51% also continued to work with underserved populations internationally, a statistic that made Murphy, Anandaraja and Atkinson especially proud as producing a generation of healthcare workers competent and committed to work with underserved populations had long been MSGH's key mission.

41. As successful as they were, Anandaraja and Atkinson found out early on in their employment that, as women doctors with impeccable credentials, they would not be treated commensurately with male colleagues, nor receive due credit for their work at Mount Sinai. In 2013, both applied for promotion from Assistant Professor to Associate Professor.

42. Dr. David Muller ("Muller"), Dean for Medical Education, told Anandaraja that he had spoken to the Appointments and Promotions Committee about her application, that the application passed first muster, that he would support it, and that he was confident that it would succeed. Muller also told Anandaraja that this was the right time in her career to submit it. He said the committee was looking to support less traditional applicants, and that her outstanding achievements in Global Health education and service would overcome any deficiencies in the

traditional area of publications arising from the fact that Atkinson had had a successful business career rather than work as an academic scientist before coming to Mount Sinai.

43. Atkinson's employment agreement letter of March 13, 2013 states "[y]ou will be recommended for a faculty appointment in the School as an Associate Professor (Clinician and/or Educator track) in the Department of Preventive Medicine. Your initial term of employment will be for five years. You will also be recommended for a secondary appointment in the Department of Medicine." Despite this, Atkinson was *not* brought in as an Associate Professor, but as an Assistant Professor. Atkinson then sought to gain her promotion to Associate Professor through Mount Sinai's formal appointments and promotions process.

44. Atkinson had sought the advice of several colleagues before applying for promotion. She visited Dr. Andrew S. Jagoda, MD ("Jagoda"), Professor and Chair Emeritus of the Department of Emergency Medicine and then-Chair of the Appointments, Promotions and Tenure Committee. Jagoda reviewed Atkinson's *Curriculum Vitae* at this meeting and encouraged her, saying "You're going for full professor, right?" Atkinson replied that she was applying only for Associate Professor, because she had come to academia relatively late in her career. Jagoda said that "given all you've done, it should be a 'slam dunk.'" He explained that Mount Sinai was interested in recruiting people from various backgrounds and different fields outside of medicine, including people with business experience such as Atkinson possessed, to help build innovative institutes to work horizontally across the institution. Given this push to recognize diverse talents, backgrounds and contributions, Jagoda said that advancement at Mount Sinai was no longer predicated strictly on traditional academic measures like publication counts.

45. Unbeknownst to Anandaraja and Atkinson, Drs. Jonathan Ripp ("Ripp") and Nils Hennig ("Hennig"), both Assistant Professors with whom they worked closely at MSGH, applied

for promotions at around the same time. While Anandaraja's and Atkinson's applications were rejected, both men's applications were approved.

46. Anandaraja received no formal explanation for the decision to reject her application, but Muller told her that he was surprised at the outcome and that it must have been "political." He suggested that Anandaraja instead switch to a less-prestigious non-academic career path to have better chances of success at Mount Sinai. Anandaraja reluctantly agreed to focus on developing new educational programs and quickly proposed an executive course in global health, which Landrigan agreed to and funded. Landrigan would not give Anandaraja written reasons for why her promotion was rejected, but in a phone call told her that it was due to lack of "geographic diversity" in her speaking engagements -- hard to understand since she was spending many months a year teaching, mentoring and training healthcare workers across the globe. He also said that she lacked publications, although this was a category that she had been specifically told would not matter.

47. Landrigan told Atkinson too that her promotion "didn't fly" because she did not have enough peer reviewed publications in "conventional biomedical journals." This was contrary to what Jagoda, the Chair of the Appointments, Promotions and Tenure Committee, had told her to expect.

48. To add insult to injury, Ripp and Hennig had reported to Anandaraja in their MSGH roles and so were in fact junior to her, but did get promoted. Anandaraja's and Atkinson's work experience, service, professional accomplishments and leadership experience equaled if not exceeded that of Ripp and Hennig.

49. Ripp's and Hennig's careers continued to flourish. The former is now the Senior Dean for Wellbeing and Resilience and Chief Wellness Officer for the Mount Sinai Health System,

and the latter is Mount Sinai's Director of the Masters of Public Health program. Meanwhile, Atkinson and Anandaraja were demoted, denigrated and cast aside.

B. ARNHOLD AND MULAGO FOUNDATIONS DONATE \$12.5 MILLION TO MSGH

50. For most of MSGH's history, its finances relied mostly on fundraising by Murphy, Anandaraja and the Advisory Board. Murphy was one of New York City's most prominent pediatricians and had a large network of influential friends and grateful patients. Many of them supported MSGH when they could. They trusted Murphy, his vision for global health and the work that he, Anandaraja, Atkinson and others were doing at Mount Sinai.

51. By 2013, MSGH's work was so impressive and well-known that it won increased support from two influential foundations in New York City, both underwritten by the Arnhold family: the Arnhold Foundation and the Mulago Foundation (together, "the Foundations"). Murphy had known the Arnholds for decades, having been the family's pediatrician of choice. He and other MSGH doctors had developed a strong relationship with the Foundations, which had become major donors to MSGH's education programs. In 2013, the Arnhold family sharply expanded their support, making a major \$12.5 million donation (split between the Foundations). The Gift Agreement between the Foundations and Mount Sinai dated January 7, 2014 stipulated:

Donor's gift will establish The Arnhold Global Health Institute, a multi-disciplinary institute dedicated to addressing the gap in global health, and will be used for the Institute's training and education mission. Of this gift, \$8,000,000 will create a permanent endowment for support for the Institute's education and training mission. The remaining \$4,500,000 will create a current-use education and training fund, enabling immediate growth and support of The Arnhold Global Health Institute.

52. John Arnhold ("Arnhold"), a Trustee of the family's foundation, said that "[s]upport for high-quality, global health education has always been a priority for our philanthropy We are delighted to have this opportunity to support the remarkable work that Mount Sinai

is doing to create the next generation of global health leaders and workers.” Arnhold also verbally stipulated that none of this donation was to fund the salary of MSGH’s director, because he wanted Mount Sinai to at least partially match his commitment to the Institute and pay the Director’s salary from Mount Sinai’s operating budget.

C. NAME CHANGE AND DIRECTOR SEARCH

53. The terms of the 2014 donation dictated that Mount Sinai “upgrade” MSGH to a formal institute, initially named the Arnhold Global Health Institute, later renamed the Arnhold Institute for Global Health. Mount Sinai announced the name change on April 3, 2014. Landrigan became AIGH’s Interim Director to oversee the Institute as well as an international search for a permanent director. The Institute moved into new offices in summer 2015.

54. Despite the changes, Mount Sinai stated its commitment to continuing MSGH’s work as part of the Institute:

[AIGH] will continue to offer education and research into global health issues and further collaboration among physicians, scientists and trainees from Mount Sinai and like-minded organizations from around the world, particularly other academic medical centers in developing nations.

1. Charney forms a search committee

55. Charney has had a long association with Mount Sinai and has become virtually synonymous with it. He was recruited to Mount Sinai in 2004 as Dean of Research and became Dean of the School and Executive Vice President for Academic Affairs of the Medical Center in 2007. Mount Sinai contributed \$500,000 towards the 2005 purchase of his \$1.95 million home in Chappaqua, NY. His discovery of Ketamine as a fast-acting antidepressant for treatment-resistant depression was named one of the top 10 medical innovations of 2017 by the Cleveland Clinic. He was also named one of the world’s most cited life science researchers in 2016 by Cybermetrics

Lab and one of the world's most influential scientific minds by Thomson Reuters in 2015. He has written or co-authored over 700 publications, including *Resilience: The Science of Mastering Life's Greatest Challenges* (2018), which examines why some people recover from trauma more easily than others. Prior to joining Mount Sinai, Charney worked at the National Institute of Mental Health and taught at the Yale School of Medicine for 18 years as a professor of psychiatry, where he also completed his residency in 1981. Charney obtained his M.D. from Penn State School of Medicine and his bachelor's from Rutgers University.

56. Upon receiving the Foundation's \$12.5 million gift commitment, Charney formed a search committee for the AIGH Director position.

57. Charney's close attention to the search showed that the position of AIGH Director was important to him. He appointed Landrigan to chair the search committee, and also appointed Muller, Murphy, Dr. Ann Marie Beddoe ("Beddoe"), System Director of Global Health and Director of Global Women's Health, Dr. Michael Brodman, Chair of Obstetrics, Gynecology and Reproductive Science, Adolfo Garcia-Sastre Director of Global Health and Emerging Pathogens Institute, and Jo Ivey Boufford, President of The New York Academy of Medicine and Clinical Professor of Global Public Health at New York University, as members. Landrigan exchanged several e-mails with MSGH staff about an appropriate job description, ultimately approving the following:

The Icahn School of Medicine at Mount Sinai seeks an experienced MD, PhD, Dr.P.H, or person with equivalent training to lead a newly endowed Institute for Global Health. Our ideal candidate is a person with well-recognized leadership skills, a scholarly portfolio that includes current grant funding and a strong publication record, and an approach to global health which fosters interdisciplinary collaboration, partnership and innovation[.] We are looking for an inspirational team leader with field experience in low and middle income countries, a grounding in public health and health education, and a demonstrated commitment to serving under-resourced and neglected populations.

58. The message to candidates was clear: Mount Sinai wanted to hire an established, experienced and inspiring global health expert to lead the Institute. The search committee agreed to limit candidates to those at Associate Professor level or above, with a “scholarly portfolio that includes current grant funding and a strong publication record” in global health.

2. Singh is asked about the search

59. When the search committee was formed, Singh had been a Visiting Assistant Professor of International and Public Affairs at Columbia University since 2011 and Director of System Design at the Earth Institute since 2006, where he worked with Professor Jeffrey Sachs (“Sachs”) to co-found the One Million Community Health Workers Campaign in 2013. He obtained a bachelor’s degree from the University of Rochester in 2003, a Ph.D. in Neural and Genetic Systems from Rockefeller University in 2009 and an M.D. from Cornell University in 2011. Singh was a 2012 Robert Wood Johnson Foundation Young Leader, a 2005 Paul & Daisy Soros Fellow and a Fellow of the Committee on Global Thought at Columbia. He had not completed his medical training when the director search began.

60. Landrigan and Anandaraja had known Singh as a Mount Sinai resident with an interest in public and global health and a promising academic background, but also were aware of some warning flags. While male doctors supervising his residency generally found him pleasant and ingratiating, female supervisors found him arrogant, rude and unwilling to learn from them. Anandaraja had also known Singh professionally because she was a Co-Chair of the Global Health Committee of the Associated Medical Schools of New York, of which Singh was a member. In that role, Anandaraja had observed that Singh was often absent from committee meetings, and that even when he did attend (typically by phone), he rarely provided any meaningful contributions,

and instead name-dropped and made vague promises to leverage his expansive network which did not materialize.

61. As Anandaraja had worked with Singh on the Global Health Committee, Landrigan asked her for her views about him. She replied:

[W]e would like to have him involved in G[lobal] H[ealth]. I just passed him in the lobby actually. I guess just find out what his interests are and then lets [*sic*] discuss in our group whether his motivations and goals fit in within the GH mission/vision. Maybe suggest that he meet with the rest of the team to find out more about what we are doing before we make any decisions - I'll reach out and see when he would like to meet with Sigrid and I....I am happy to work out a niche for him /with him if he is compatible and willing and we can work out funding - will he need an FTE?

And, you probably already know that his wife and he are working on a community health worker model for East Harlem - it is super interesting and I think in alignment with our dual training mission - there is a lot of overlap in what we do. I think he could be a valuable mentor for trainees too. Not sure if he is such a team player - which is important for us - but that remains to be seen.

62. Landrigan met with Singh on February 24, 2014. When the meeting ended, Landrigan e-mailed Anandaraja to say he had discussed her concerns about Singh with him and that they could talk about it further at the next Global Health team meeting.

63. At that meeting, Landrigan and Anandaraja discussed how Singh might be someone to keep on their radar for a junior position at AIGH. He was well-connected and clearly ambitious. Anandaraja and Landrigan agreed that once Singh finished his residency, they could create a 10-20% role for him at AIGH to work as a clinical instructor, running a research project or a health site abroad. They thought this kind of opportunity would excite him and would also be appropriate to his junior level of experience.

64. In May, Dr. Kevin Starr ("Starr"), CEO of the Mulago Foundation and the *de facto* Arnhold family representative for many of their philanthropic efforts, suggested that the committee ask Singh if he knew of any suitable candidates to be AIGH Director. Anandaraja and Dr. Sigrid

Hahn, an MSGH faculty member, consulted Singh, who provided them with three names who were too inexperienced or otherwise unsuitable. Singh did not mention himself.

65. Explaining that the candidates Singh put forth were not right for the role, Anandaraja sent Singh the job description for the search with a cover note:

I know our goal is to explore candidates outside the traditional profile, but I think it likely that there are some immovable criteria - so it would probably save us time and energy to exclude candidates that are too young (less than 40???) and, if from an academic background, less than associate prof level...

66. It was clear that the search committee sought somebody experienced, with leadership and management background and a strong academic track record, including sizable grants and an outstanding publications record. Singh responded, "tough crowd," apparently resigned to the fact that the selection committee did not find his suggestions suitable.

3. The Committee recommends Dr. Steffanie Strathdee

67. After a wide-ranging search, the committee narrowed the large application pool to a shortlist of ten scholars. Some had more than 100 publications and ran their own departments and institutes elsewhere. One such candidate was Strathdee.

68. Strathdee is a formidable expert in global health. When she applied, she was the Harold Simon Professor at the University of California San Diego ("UCSD") School of Medicine, Associate Dean of UCSD's Global Health Sciences and Chief of the Division of Global Public Health. She also served as Director of the UCSD Global Health Initiative and the Co-Director of the GloCal Fellows Program. Strathdee had written hundreds of peer-reviewed publications and was a leading researcher in HIV-risk behaviors among drug users and sex workers on the U.S.-Mexico border. In 2018, she co-founded the Center for Innovative Phage Applications and Therapeutics, the first phage therapy center in North America. She did so after conceiving of and

overseeing the first use of phage therapy in the United States to treat antibiotic-resistant bacterial infection, an innovation that has attracted considerable media and scientific interest.

69. Landrigan, Murphy, Anandaraja, Beddoe and others were excited about the prospect of Strathdee leading the Institute and the committee overwhelmingly endorsed her. However, before she could meet with Charney for final confirmation, Anandaraja, Landrigan and Murphy saw Charney on September 29, 2014, to propose a budget for AIGH that they had worked out with Strathdee. Murphy and Landrigan presented the budget to Charney, with Anandaraja providing context for a few aspects about which Charney had questions. The exchange became surprising. Charney screamed, threw the budget down on the table, pounded his fist on the table and exclaimed that the budget was unacceptable, because they were asking for too much. He claimed that AIGH had not raised any money for Mount Sinai—which was a strange claim in light of the Arnhold gift and substantial other fundraising—and that the budget they were seeking was ridiculous.

70. The team went back to the drawing board with Strathdee to make the budget more palatable to Charney, but none of their revisions changed his mind. He sent an unacceptable final offer to Strathdee on October 13, 2014. His manner towards her had been similarly dismissive in other interactions, including writing her an e-mail calling her “AN IDIOT,” in red font and all capitals.

71. Strathdee declined the offer. In separate e-mails to Charney and Anandaraja, she cited her disagreements with Charney over the budget. On the phone, Strathdee told Anandaraja privately that the real reason was that Charney had been unbelievably rude to her, that she had never been spoken to like that in her life and that she could not and would not work for a bully like him.

72. Anandaraja, Atkinson, Murphy and Landrigan were distressed. Strathdee was a major scholar and leader in global health, and her experience and capacity would have brought significant strengths and important new relationships to AIGH. Charney's rudeness to her as she negotiated the details of her position, the same as any other senior figure would do, meant that Mount Sinai was throwing away a chance to hire one of the nation's top scholars in this field. Since the Institute now had plenty of money, and Strathdee was accomplished and had many good ideas for its future, Charney's vituperative dismissal of her and her proposed budget did not make sense—unless he had some other candidate in mind.

4. Charney blames Anandaraja for the failed Strathdee negotiations

73. Despite Murphy's and Landrigan's leading roles in the meeting where Charney had screamed at them, Charney began referring to the budget as "Anu's [Anandaraja's] budget." He continued to call it ridiculous and implied that the negotiations with Strathdee failed because of it. After Strathdee withdrew her application, several people at Mount Sinai suggested that Anandaraja become AIGH's Interim Director while the search committee looked for a replacement. When Anandaraja approached Muller about the idea, he told her Charney would reject it because he was angry about the budget and therefore angry with her. Indeed, Charney was blaming Anandaraja for Strathdee's withdrawal, though Charney was the reason. The men on the selection committee, Murphy and Landrigan, were equally responsible for the budget Charney castigated as ridiculous, but he blamed only the women involved, Anandaraja and Strathdee.

74. Anandaraja knew that Charney was making her a scapegoat for his own bullying and bullheadedness, but she wanted to be a team player, so she committed herself to finding another strong candidate for AIGH Director.

5. Charney instructs the search committee to consider only Singh

75. Charney's instruction to the search committee after Strathdee declined his offer was to return to its pool of applicants, continue interviewing and pick another candidate. But then Charney called Landrigan to put Singh forward as AIGH Director. (Wanting to pick Singh may have been Charney's unstated motive for torpedoing Strathdee.) Unable to say no, Landrigan set up a day of interviews for Singh.

76. Beddoe was astonished by this. Singh was still a resident, had not yet completed his medical training, and was vastly underqualified for this senior job.

77. Anandaraja felt conflicted. On the one hand, she knew that Charney was very unlikely to change his mind. She anticipated that the interview process would be window-dressing to make it look like Singh had gone through a rigorous selection when in fact Charney had already picked him. But at the same time, she was genuinely concerned that Singh lacked skills and qualifications for the job, particularly management experience. He seemed a strange choice to run a sophisticated institute with accomplished staff and a track record that had just won it \$12.5 million in new money.

78. The committee had identified a number of other promising applicants, including Dr. Francesca Gany of Memorial Sloan Kettering Cancer Center, an extremely qualified woman, but put them on hold knowing that the final call was up to Charney. On January 12, 2015, Landrigan wrote Anandaraja and Muller reporting that he had presented Gany's CV to Charney, but Charney remained focused on Singh. When Muller asked whether it was worth him "needling" Charney to consider Gany's candidacy, Landrigan said that Muller could go ahead, but that "if[Charney] is completely smitten by [Singh], end of story."

79. Anandaraja and Atkinson also knew that Mount Sinai might have trouble attracting another suitable candidate, especially a female candidate, given Charney's reputation. After being asked to interview, one notable female leader in global health from a prominent medical school told them flatly that she would not consider working for Charney because of his well-known misogyny.

6. Singh visits AIGH

80. Trying to do a thorough vetting process despite the high likelihood that Charney's mind was already set, Anandaraja asked Starr for his views about Singh. Starr replied that AIGH needed a brand, a "special sauce" to truly develop and become successful. He told Anandaraja that Singh was a visionary, somebody who could use his *je ne sais quoi* to change the world. Anandaraja was not convinced. But Starr told her that he would be able to convince the Arnholds to donate \$15 million more if Singh became AIGH's Director.

81. Singh's official interview, lecture and visit to AIGH was on December 16, 2014. Attendees were generally unimpressed, including Beddoe and other members of the search committee. The audience asked him several questions after his lecture that he was unable to answer, including one from Beddoe: "What do you see as the most important problem in global health that we will face in the upcoming years?" Singh prevaricated. He came across as unprepared and underqualified, a self-pleased young man who lacked the experience to run the Institute.

82. Some were struck by how much name-dropping he did. After the lecture, Singh boasted to Beddoe that he had extensive contacts in Liberia, including the country's President, and said he could put her in touch with some of them if it would be helpful. Beddoe had her own contacts there from her prior work, and when they began to discuss specific names, Singh suddenly

fell silent, leaving her with the impression that in fact he did not have the contacts he had claimed, and was worried this would be exposed if the conversation continued.

83. Members of the search committee submitted evaluations to Landrigan after Singh's visit. Several of them regarded him as clearly unsuitable. Beddoe gave him a score of zero on virtually every committee metric. When she submitted her scores to Landrigan, he asked if she really wanted to score Singh in this manner. Beddoe replied that it was an appropriate assessment for someone who was clearly not qualified for the position.

D. DESPITE LACK OF QUALIFICATIONS, CHARNEY HIRES SINGH

84. Objectively, all zeros was not an unreasonable score for Singh on the committee's metrics. High-level positions, such as the director of a major global health institute, normally require candidates to have dozens of peer-reviewed, original research articles. Singh's CV at the time showed very few publications, and none contained original global health research; he wrote mostly simple opinion pieces.

85. Singh also had no federal grants, usually a given for reputed researchers and a requirement for high-level positions overseeing research. Singh's funding came primarily from private foundation grants regarded as less prestigious than the R01 grants from the National Institutes of Health.

86. Moreover, the CV Singh submitted to the search committee repeatedly overstated his credentials. For example, he stated that he was an Assistant Professor at Columbia University when he was in fact a Visiting Assistant Professor.

87. Singh also misrepresented his publication record by using non-standard formatting and exaggerated his funding by implying others' grants were his own.

88. Nevertheless, Charney evidently thought Singh was a remarkable find. On February 2, 2015, he met with the Institute's Advisory Board to tell them Singh was his choice, as shown in the meeting minutes:

He is close to finalizing the recruitment of a "founding leader" for the Arnhold Global Health Institute. If all goes through the new Director will be Dr. Prabhjot Singh, who is Director of Systems Design at the Earth Institute, Assistant Professor of International and Public Affairs at Columbia University, as well as a current resident at Mount Sinai. [...]

Advisory Board members will receive the official announcement, but are asked not to share the information until it has been made official.

During the board's ensuing question and answer session, Dean Charney shared that Dr. Singh has already presented him with a vision statement for the Institute and brings creativity and ambition to his new position. Dr. Singh also brings strong relationships with key foundation funders including Robert Wood Johnson and Gates Foundations. The Dean is very excited about this candidate and will be working with Dr. Singh on setting up a five year plan (with metrics) and recruiting faculty. In addition, Dr. Charney will be personally mentoring Dr. Singh and meeting with him weekly.

89. Many members of the Advisory Board were concerned by Charney's approach. They noted Singh's lack of experience and asked how and by whom he would be supervised. Charney seemed annoyed by their comments and offered only curt replies; he said he would supervise Singh personally and meet with him weekly. Charney's focus seemed to be on quieting the Advisory Board so that he could get his way.

1. Charney announces Singh's arrival

90. Charney hired Singh within a few weeks of the Advisory Board's February 2015 meeting, but did not tell the Advisory Board or the AIGH staff he had done so. Instead, Anandaraja, Atkinson and the other senior staffers learned that they had a new boss from their colleague, Hennig, who happened to attend an unrelated meeting where Charney spoke, said:

I am just coming out of the Student Council Steering Committee meeting where Dennis Charney announced that Prabhjot Singh signed the contract to be the new GH Institute Director. He will start in September.

91. Charney did not even inform Landrigan, his own Dean for Global Health, who also first found out from Hennig. The official notice to everyone else at AIGH took another week, via an “All Staff, Faculty and Students” e-mail from Charney:

We are delighted to announce the appointment of Prabhjot Singh, PhD, MD, as Director of the Arnhold Global Health Institute at Icahn School of Medicine at Mount Sinai, and Vice Chair of Population Health in the Department of Medicine, effective September 1, 2015.

The Arnhold Global Health Institute, a new interdisciplinary institute, is dedicated to improving the health of people worldwide by building global partnerships in research, education, and clinical care. As Institute Director, Dr. Singh will align high-potential global and domestic health activities across the Icahn School of Medicine and the Mount Sinai Health System.

As Vice Chair, Dr. Singh will lead the development of educational and research goals for population health within the Department of Medicine, in collaboration with the Department of Population Health Science and Policy.

These dual responsibilities will enable Dr. Singh to blend advances in domestic population health—including economic principles, biomedical advances, and systems science—with principles that have historically driven global health activity, such as social impact, inequity, and human rights.

Dr. Singh has been recruited to the Icahn School of Medicine at Mount Sinai from Columbia University, where he is currently Director of Systems Design at the Earth Institute, and a faculty member in International and Public Affairs.

Dr. Singh’s varied and far-reaching activities include global work as Chair of the One Million Community Health Workers Campaign, an initiative of the African Union and the United Nations. Sustainable Development Solutions Network, as well as local development of City Health Works, a Harlem-based social enterprise. Dr. Singh is also Special Advisor for Design and Strategy for the Peterson Center on Healthcare.

Dr. Singh earned his PhD in Neural and Genetic Systems at Rockefeller University, and his MD degree at Weill Cornell Medical College. His postdoctoral training included a fellowship in Sustainable Development at Columbia University, and an internal medicine residency at Mount Sinai. He has been honored as a Robert Wood Johnson Foundation Young Leader, a Paul and Daisy Soros Fellow, a Truman Security Fellow, and term member of the Council on Foreign Relations. His work

has been featured in Proceedings of the National Academy of Science, Lancet, the Bulletin of the World Health Organization, Health Affairs, and The New England Journal of Medicine.

Please join us in congratulating Dr. Singh on his new roles as Director of the Arnhold Global Health Institute and Vice Chair of Population Health in the Department of Medicine.

92. This announcement was misleading in two ways: it states that Singh was recruited from Columbia when in fact he was already in the internal medicine residency program at Sinai. Further, it implied that he had already completed his residency, when he had not. Apparently, Charney was sensitive to Singh's junior status and how it would appear to the community at large.

93. Charney's infatuation with Singh was so total that this 32-year-old junior scholar was not only given the reins at AIGH but also a position as Vice Chair in the Department of Medicine.

2. Singh's recruitment is consistent with Charney's broader hiring practices

94. Charney's track record of hiring underqualified young people, especially men, for very senior positions extends well beyond Singh.

95. Upon information and belief, Charney is partial to "moon shot" initiatives run by men he considers uniquely gifted. While some of them are undoubtedly talented, there is now a considerable track record of these unrealistic initiatives failing at the cost of tens of millions of dollars, partly because several of them have been run by underqualified and inexperienced young men with whom Charney was nevertheless besotted. Some examples of Charney's faith in his ability to pick young genius leaders include:

- Paul Kenney was hired in his 40s as Chairman of the Department of Pharmacology and System Therapeutics with the goal of making Mount Sinai a leader in the development of new medicines, a notoriously difficult enterprise. After the

expenditure of many millions, the initiative failed and many employees were displaced; Charney nevertheless made Kenney Chair of Neuroscience.

- Ross Cagan was hired to direct the Center for Personalized Cancer Therapeutics in 2013, with considerable publicity about using fruitfly models to invent targeted gene therapies for cancer. His science turned out to be unfounded and patients seeking treatment were turned away as the “ground-breaking” clinical studies described in his publicity were essentially non-existent.
- Eric Schadt, a mathematician and scientist, was recruited by Charney in 2011 from Merck and rose to become Dean for Precision Medicine, Professor of Genetics and Genomic Sciences, and Professor in Predictive Health and Computational Biology. He was also founder and CEO of Sema4, a private company spun out of Mount Sinai, into which the school invested up to \$100 million to develop commercial products from Mount Sinai discoveries. The company is a failure: Earlier this year, it posted net losses of \$85.7 million, laid off 30% of its staff and closed down one of its laboratories. On information and belief, senior researchers were aware for a long time that Sema4 was making no real advances, but Charney kept backing Schadt. He stepped down from his roles earlier this year.

96. These impulsive appointments have led Mount Sinai to significant failures.

97. Another example of Charney’s elevating a young man to positions senior to his qualifications is his son, Alexander Charney (“Alex”). He was rapidly promoted to Assistant Professor in four separate departments at Mount Sinai directly out of his residency, skipping several steps in the normal path to advancement and vaulting over better-qualified candidates.

98. On information and belief, Alex continues to receive preferential treatment and is widely regarded within Mount Sinai as having been promoted out of his depth. In 2020, he was installed Co-Director of the COVID Informatics Center and effectively made the gatekeeper for COVID-19 biospecimen samples, a responsibility considered far senior to his experience level and expertise. Researchers working on urgent projects relating to COVID-19 reported that he failed to respond to requests for access to biospecimens necessary for their work. In July 2020, Alex was listed as first and corresponding author on a paper describing a study in which Mount Sinai's Institutional Review Board authorized the collection of samples from COVID-19 patients without obtaining their informed consent; an extraordinary departure from normal scientific protocols. In August 2022, Alex was promoted to Co-Director of the prestigious Charles Bronfman Institute for Personalized Medicine at Mount Sinai, replacing a highly qualified female Director and assuming a position usually reserved for people of much greater seniority.

99. Charney's enthusiasm for Singh-the-wunderkind, who would use his "special sauce" to make AIGH into a cool startup, followed this well-established pattern of favoring young men who lacked the background or experience needed to do the difficult jobs into which they were suddenly thrust.

E. SINGH SETS OUT TO MAKE AIGH YOUNGER AND DRIVE OUT OLDER FEMALES

100. Although Charney hired Singh in February 2015, Singh's official start date at AIGH was postponed until September because first he had to finish his internal medicine residency. Landrigan was expected to handle all business until Singh was ready to take over, but Singh started intervening as soon as his appointment was announced, making the interregnum uncomfortable and confusing to AIGH's staff.

101. Singh started pushing his own agenda and projects before he could learn about AIGH's existing projects and commitments. His first official visit as Director-designate took place on April 7, 2015, when he met with AIGH's key staff, including Murphy, Anandaraja and Atkinson. He said that his schedule was too busy to meet with anybody for more than 20 minutes.

102. Anandaraja realized this was hardly enough time to learn about the Institute's substantial array of programs or ideas for future growth but tried to organize the meetings as well as she could to let Singh understand what he was taking over. She also asked everybody to prepare a short briefing about their work so Singh could read them in advance. This took Anandaraja and her staff many hours and several all-nighters to produce.

103. When Singh met the staff, however, he made it clear that he disdained AIGH's existing projects and did not care to learn about them. He appeared not even to have read the reports. He simply did not want to hear about what they had been doing or their well-developed plans for what to do next.

104. That disdain extended beyond AIGH's projects to those who had cultivated and championed them. The die had already been cast: out with the old, even if it was superb and had taken years to build; in with the new. That way Singh would never have to share accolades arising from the Institute's success.

105. Indeed, he had already hired a consultant to "evaluate" AIGH, instructing her to review "legacy activity in education and global health sites," to streamline the department and "bring down the number of global health sites to 2-3 and education processes down to one coherent flagship program." This was the first step of many to dismantle the Institute's acclaimed body of work, erase its important legacy and eliminate the gifted doctors who had made its reputation.

1. Singh dismantles the Advisory Board

106. Soon after Singh was hired, Tal Recanati (“Recanati”), then-Chair of the AIGH Advisory Board, hosted a welcome event for him at her home, attended by many of AIGH’s staff and Advisory Board members. They asked Singh about his plans so they could help deliver them, but Singh was unable or unwilling to articulate any vision. When they pressed harder, he responded evasively.

107. By spring 2015, Elizabeth Stern (“Stern”) had succeeded Recanati as Chair of the Advisory Board. With Singh’s tenure as Director set to begin, Stern met with him in May or June 2015 to discuss the Institute’s future. Oddly dismissive of Stern, Singh opened their meeting by saying he was not sure there was much to talk about and then spent the rest of their hour-long session boasting about himself and his connections. Though Stern was more experienced in global health fundraising and philanthropy, Singh repeatedly interrupted her and showed no interest in her views.

108. Stern left with the feeling that Singh did not respect women in leadership roles and would be demeaning as Director. He spoke so poorly of the existing global health program that Stern thought he may have been planning to fire the entire team before he even got to know them. Afterwards, she told Murphy, “We have our hands full.”

109. Stern decided to ask her contacts at the Earth Institute at Columbia University, where Singh had worked, what they knew about him. They said Singh was “trouble” and that any woman reporting to him needed to have her wits about her.

110. It quickly became clear that Singh disapproved of the Advisory Board, whom he denigrated as the “ladies who lunch” and did not see as a useful resource. Despite their history of

successful fundraising efforts for MSGH/AIGH, Singh refused to meaningfully consult with them on strategy or fundraising initiatives.

111. When Anandaraja questioned Singh's disdain for the Advisory Board and her concern that this would lose AIGH valuable funding, Singh boasted that he had no need for a Board of "old and outdated," "out-of-touch" people as he was connected to a young dynamic group of billionaires or heirs to billionaires who were eager to support his vision. He did not name any of them.

112. Apart from begrudgingly attending two meetings with the Advisory Board early on in his tenure at AIGH, Singh was openly uninterested in any further meetings with them. Stern finally managed to arrange a third meeting with Singh and Berman in July 2016 to review AIGH's strategy, but Singh was characteristically unwilling to be questioned about any of his initiatives and the meeting ended badly. Afterwards, Stern reached out to Singh to liaise about next steps, but he avoided her. Given Singh's attitude, the Advisory Board was dissolved soon after. Stern was disappointed—they were all dedicated volunteers who had donated their own time and money for years to keep AIGH afloat. But Singh had rid himself of people who knew AIGH well and could be a source of independent criticism.

113. Singh let it be known he was thinking of creating another advisory panel that would include Dr. Jeffrey Sachs ("Sachs"), who had recommended him for the AIGH job and with whom he worked at Columbia University (claiming credit for doing much of Sachs' writing). Singh hired Sachs for an advisory role, paying him \$121,100 per year for two years in exchange for eight hours of work per week (equivalent to \$2,523 per eight-hour day assuming a 48-week working year).

2. Singh hires young people, mostly men, to lead AIGH

114. Singh was bedazzled by the sparkle of technology start-up companies and frequently spoke of running AIGH as a start-up. To fit this image, he hired new additions to AIGH, many his friends, and nearly all men his age or younger, without any normal hiring process. Existing female faculty were never made aware of these job openings, although some overlapped with their own roles.

i. Abdulrahman M. El-Sayed

115. Singh's first hire was a former colleague from Columbia University, Dr. Abdulrahman M. El-Sayed ("El-Sayed"). Singh hired El-Sayed in spring 2015 to become his right hand, AIGH's Associate Director and an Associate Professor of Population Health Science and Policy at Mount Sinai. Singh did not open the position to AIGH staff, others within Mount Sinai or to the public—he recruited El-Sayed directly. El-Sayed, a former Rhodes Scholar, was 30 years old. He finished medical school in 2014, and in the same year was appointed Assistant Professor of Epidemiology at Columbia University.

116. Although Singh did not officially announce El-Sayed's hiring to the staff at the Institute for a while, El-Sayed knew he had the job. In or before April 2015, without having worked a day at AIGH, El-Sayed listed himself as its Associate Director in materials for an upcoming New York conference, C3 U.S.-Arab Healthcare Summit.

117. Rahona learned this through her professional network. On April 9, 2015, she sent an e-mail to Anandaraja asking about it. Anandaraja was as surprised as Rahona—she knew nothing about it, a complete departure from the consultation and thorough vetting people normally received for jobs at Mount Sinai.

118. Soon, El-Sayed began visiting the Institute and various events associated with Singh's hire. He was named Associate Director of AIGH and Associate Professor at the Icahn School of Medicine. He became Anandaraja's boss, tasked with integrating AIGH's research and educational missions, which significantly overlapped with her responsibilities. He was one year out of medical school and had not completed a medical residency. On information and belief, he was paid around \$200,000 a year. He was included in Singh's strategy meetings and e-mail chains, and was introduced to AIGH's Board of Advisors. El-Sayed boasted to Anandaraja that he was furnishing his AIGH office with very high-end furniture, using leftover grant money from grants he transferred from Columbia University to Mount Sinai. However, at some point in the summer of 2015, El-Sayed decided not to join AIGH after choosing to take a job in Michigan.

119. Singh and El-Sayed both boasted to Anandaraja that they were part of a group of academics who had a tacit agreement to promote each other's reputations and provide each other with prestigious speaking engagements and career opportunities.

120. Although the Associate Director role remained empty after El Sayed's departure, and although Anandaraja had more than competently filled the role of Director of Global Health Education at MSGH prior to Singh's arrival, Anandaraja was not given the opportunity to assume the Associate Director's role, or even to apply for it. Instead, she was kept in limbo while Singh looked for another young male to put into that leadership position. In early 2016 he offered it to Dr. Sandeep Kishore ("Kishore").

ii. Sandeep Kishore

121. Kishore had been Singh's college roommate. Kishore, in his early 30s, had graduated from medical school just two years earlier, and left a medical residency before completion to join AIGH. On information and belief, he was paid around \$200,000 a year, made

an Assistant Professor and Associate Director of AIGH Learning, Training and Influence. One year earlier, on March 13, 2015, Singh sent an e-mail saying that he was thinking about offering Kishore the position of Global Health Fellow at AIGH, reporting to Anandaraja, which would have been an appropriate junior post for him. But in Spring 2016, Singh put Kishore in a position senior to Anandaraja's to take on what had essentially been her role, for which he had little experience or qualifications.

iii. Aaron Baum

122. Another friend hired by Singh was Aaron Baum ("Baum") as Assistant Professor and economist at AIGH at \$120,000 per year. Singh had been Baum's PhD advisor at Columbia, and Baum had worked with Singh's wife. When he actually finished his PhD in economics three months later, his salary was increased by \$40,000.

iv. Bruno Silva

123. Silva was hired to manage and lead the AIGH design team in 2015, before he graduated from the School of Visual Arts with a Master's in Fine Art degree in 2016. Silva was in his late thirties. His mentor at the School of Visual Arts was a close friend of Starr and Singh and led the PopTech consulting team that Singh hired in his first months at AIGH (see ¶¶ 125-127). On information and belief, Silva was paid \$120-150,000 per year and received a supplement.

v. James Faghmous

124. James Faghmous ("Faghmous"), a Ph.D. in Computer Science, was hired in July 2015 as Assistant Professor and Chief Technology Officer at AIGH. On information and belief, he was paid over \$200,000 a year. He was 32 years old. During his interviews, Singh led him to understand that he and El-Sayed would join him as the founding members of AIGH. Singh never acknowledged that the "legacy staff" even existed.

vi. PopTech and other consulting firms

125. Singh spent lavishly on several rounds of consultants. In May 2015, he hired PopTech, a firm Singh called “enterprise design experts.” He explained to Landrigan that they would help “us move forward on our inclusive, strategic planning process, which allows [us] to bring in a wide set of perspectives and allows us to amplify core principles and values of the Institute.” PopTech sent the Institute a six-figure bill, which Singh and Charney approved for payment.

126. On information and belief, Singh did not conduct an open search to find consultants at a competitive price. He hired PopTech directly after they had named him as a PopTech Science Fellow for 2013 and promoted him at one of their past conferences.

127. Much of the work for which Singh hired consultants could have been done internally. Singh required Anandaraja, Rahona, Atkinson and other female employees at AIGH to work closely with PopTech and other consultants, spending many hours talking with them. They were required to hand over work and institutional knowledge that they had gathered over many years at AIGH, only for the consultants to repackage and present it to Singh as profound new insights.

F. SINGH PREJUDGES THE “LEGACY STAFF,” WITH CHARNEY’S BLESSING

128. Singh’s hiring spree was not rooted in his rolodex alone. It was also sexist and ageist—the first step towards driving out older female workers.

129. Singh used the terms “legacy staff” and “legacy initiatives” as pejoratives—meaning the old MSGH staff and programs that didn’t fit his snazzy Silicon Valley vision of tech bros remaking global health. Singh treated them like inconvenient barnacles, soon to be cleared

away, without considering whether they could make substantive contributions to his vision for AIGH.

130. It quickly became clear that being “old” and especially “old and female” were sufficient reasons to be ignored, and then forced out of AIGH. This was Singh’s plan from the beginning. On information and belief, Charney knew and approved of Singh’s plan to rid AIGH of all the old staff and replace them with young graduates. In fact, Murphy told Stern that it was Charney who authorized Singh to move out all the “legacy staff” and start afresh shortly after he hired Singh.

131. During a presentation to AIGH’s Board of Advisors on June 17, 2015, which Murphy, Anandaraja, Atkinson and Rahona attended, Singh announced that his strategic plan was to populate AIGH with a team who were “ideally young, in their twenties and thirties.” Rahona and Anandaraja were in their 40s, and Atkinson was in her 60s.

132. In a later presentation to AIGH staff outlining priorities for the remainder of 2015, Singh emphasized the need to “manage legacy staff and initiatives that are unfocused and below the standards required to help realize the new vision.” Those words were code for dumping the work and the gifted older women who had brought AIGH to prominence.

133. Murphy, the founding father of global health work at Mount Sinai, was very disturbed by Singh’s presentation. He wrote him an e-mail to defend the quality of AIGH’s team, his colleagues for many years:

Dear Prabhjot,

Greetings! (that by the way is how one’s letter from the Armed Forces begins when you are drafted (it happened 1 week after our wedding!))

[...] You may want to rethink the phrasing of [“Manage Legacy staff and initiatives that are unfocused and BELOW the standards required to help realize the new vision”] to recognize that we are not “legacy staff”, we are the founders and builders

of the program and the ones that brought it into this next phase through our efforts and our fundraising and that the term “legacy staff” could be read as insulting.....

Also we acknowledge that our programs have room for improvement and alignment with new vision, but seeing them described as “below standard” will yield nothing positive.

The advisory Board is aware of all of this, so the question is.....what’s next? Looking forward to our Advisory Board meeting this coming Wednesday.

Take care,

Ramon

134. Singh’s attack on legacy programs was no oversight. It was central to his plan to run AIGH his way—and Charney, on information and belief, had given him free rein. Because Mount Sinai’s human resources policies prevented Singh from firing employees wholesale, he had to make them leave “voluntarily”— which meant demoralizing them.

135. When Singh interviewed Amanda Misiti (“Misiti”), who later joined AIGH as a Program and Policy Research Manager, he told her he had to “get rid of these women.” He bragged to Misiti and others that he had driven legacy staff out of AIGH because he needed a “clean house.” When he brought this up again, Misiti asked him, “well, how did you do it? Did you fire them?” and Singh responded “No, there’s a way that you do it that’s not firing.”

136. Shortly after Dr. Stella Safo (“Safo”), a new hire who was not part of the legacy group, started in September 2015, Singh talked to her about Atkinson. “I’m getting rid of her. It’s just a matter of time.”

1. Singh drives out Rahona

137. When Singh was hired, Rahona served as AIGH’s Administrative Director, providing high-level administrative support in budget planning and fundraising and working closely with AIGH leaders such as Murphy, Anandaraja and Atkinson. In a normal transition, she

would have worked closely with Singh on budgets, office space leases, new hires and other important decisions. Instead, Singh shunned her as if she were a filing clerk.

138. In March 2015, just a month after Singh was hired, Rahona was asked to provide information for a new job posting for AIGH on Mount Sinai's website. Unaware of the posting, she asked to see the job description. The job description was nearly identical to her own. Despite years of strong job performance at AIGH, Singh had decided to replace her before they had even met. He was forcing her out.

139. Rahona contacted Vivian Reccoppa ("Reccoppa"), an administrator at Mount Sinai expert in its hiring procedures. Reccoppa was confused by the language of the job posting, noting that it did not follow Mount Sinai's template and that the proposed title, Chief Operating Officer, did not comply with Mount Sinai's guidelines.

140. Rahona met with Caryn Tiger-Paillex ("Tiger-Paillex"), Mount Sinai's Director of Human Resources, for approximately an hour and a half, to register her concerns about AIGH and her position. Tiger-Paillex appeared uninterested in getting involved, and dismissed Rahona's concerns about being forced out by saying that Rahona could apply for the open position if she wanted to. So Rahona turned to Anandaraja, who said she would try to discuss the issue with Singh directly. A few weeks later, Singh agreed to talk to Rahona by phone.

141. Singh opened the call brusquely, telling Rahona, "I don't have a lot of time," followed by "Is this about the position? I'm not supposed to have to deal with this." Before Rahona had a chance to say anything, he added, "I need someone intellectually capable and whom I can trust." His implication was that Rahona was stupid and untrustworthy, for which he had no evidence and which is false.

142. Singh continued by berating Rahona for not being a “team player.” He criticized her for not directing mail to his new office properly. Rahona replied that this was not due to her, but to the lack of administrative infrastructure for the new Institute in the wake of its separation from the Department of Preventive Medicine, and Singh’s failure to properly assign and delegate responsibilities. Singh said he expected her to take on all administrative tasks, before ending the call abruptly by saying, “I don’t have any more time to discuss this.”

143. A few weeks later, Singh hired Kirsten Knaup (“Knaup”) through the job posting to become AIGH’s Chief Operating Officer, effectively absorbing Rahona’s position.

144. After Knaup’s hiring, Singh largely ignored Rahona and assigned her only low-level administrative tasks, a significant departure from her previous responsibilities. Rahona complained to Clarissa Jones-Winter (“Jones-Winter”), Director of Employee Relations, on July 1, 2015. Rahona was candid, telling her about the irregular way Singh was hired, how Charney was giving him *carte blanche* to dismantle AIGH, how Singh was excluding the older women (her, Atkinson and Anandaraja) and had hired external consultants to give him a fig leaf for his purge. Rahona told Jones-Winter that Singh was forcing her out by reducing her duties as Administrative Director to basic secretarial work. Jones-Winter candidly said she was not surprised, and that new managers sometimes deliberately set up staff to fail in such a way that they either resign or are let go because they are unable to perform their job as newly defined.

145. Subsequently, Singh asked Rahona out of the blue to design a fellowship program, though MSGH already had a well-established “legacy” fellowship program that Singh summarily disregarded. Without information on AIGH’s redesigned mission, faculty, budget and programs, Rahona knew she could not possibly succeed at this task and that Singh was likely setting her up to fail. She told him she would take a two-week vacation and start on her return. During the

vacation she reflected about her prospects under Singh, and when she returned, announced her resignation.

146. Several weeks later, Singh and Knaup contacted Rahona asking if she wanted to remain at AIGH but without offering a clear job description. Rahona believed they were worried that her resignation, coming so soon after Singh's official start date as Director, would tarnish the optics of his arrival.

147. Rahona declined. Although she did not have another job lined up, she had no confidence in Mount Sinai's leadership and did not want to continue being associated with it. Rahona's last day was October 2, 2015.

2. Singh cuts Atkinson's pay

148. When Singh became AIGH's Director, Atkinson was Director of the Human Rights Program at AIGH. She holds a M.D. from the University of Rochester and a M.S. from the Columbia University Graduate School of Journalism, and has wide-ranging business experience both nationally and internationally.

149. Atkinson's primary research interest is on the intersection of health and human rights. In particular, she focuses on how human rights violations affect the health and well-being of women and girls, most recently focusing on human trafficking and female genital mutilation/cutting.

150. In 2006, Dr. Paul Klotman, then-Chair of the Department of Internal Medicine at Mount Sinai, asked Atkinson to sit on an advisory board to guide the new Advancing Idealism in Medicine ("AIM") program, which aimed to support and advance idealism among Mount Sinai's internal medicine residents. Within a few months, on October 1, 2006, Mount Sinai asked

Atkinson to co-direct AIM with Ripp and become an Assistant Clinical Professor in the Department of Internal Medicine.

151. Over the next several years, Atkinson became increasingly involved in teaching at Mount Sinai, mentoring students and working with them to develop the new Human Rights and Social Justice Scholar Program. In January 2012, Atkinson joined MSGH to build a strong human rights program.

152. In October 2012, Atkinson presented her vision for MSGH's human rights program at a fundraising event attended by Don and Georgia Gogel (the "Gogels"). After the event, the Gogels announced a one-time \$200,000 gift to help MSGH cover Atkinson's salary so she could accomplish the plans she had described.

153. As a result, on March 13, 2013, Mount Sinai offered Atkinson a new five-year contract at a base salary of \$150,000, effective April 1, 2013, with dual faculty appointments as Assistant Professor in the Department of Medicine and the Department of Preventive Medicine, and an administrative appointment as the Director of Human Rights. The Gogels' gift provided Mount Sinai with initial funding for Atkinson's salary, but her contract did not require or expect that Atkinson would secure funding for the remainder of the contract term.

154. Atkinson made substantial contributions to Mount Sinai. She helped build out the Advancing Idealism in Medicine program, served as faculty mentor to students as they established the Human Rights and Social Justice Scholars Program for first-year medical students, and relaunched the Human Rights Clinic, which she expanded to include other faculty and students to ensure its long-term viability, as the initial phase of building a robust human rights program. She developed and taught innovative curricula for two new mandatory courses for medical students at Mount Sinai, "InFocus 3: Health and Human Rights" and "InFocus 4: Physician Advocacy," and

co-developed a curriculum for addressing patients' spirituality needs in the surgery/anesthesiology clerkship for third-year medical students.

155. In her teaching role at Mount Sinai, Atkinson quickly became a highly regarded presence in the classroom. She taught Health, Human Rights and Advocacy as part of the Human Rights and Social Justice program, served as regular guest lecturer in the Master of Public Health Human Rights course, and taught in the Ambulatory Care Clerkship courses.

156. Also during her time at Mount Sinai, Atkinson continued her high-profile international work investigating major human rights violations, including the oppression of Shias in Bahrain and the massacre of Muslims in Myanmar. As a result of the investigation in Myanmar, she and her co-investigator presented their findings to the State Department, the House Foreign Affairs Committee, the Tom Lantos Human Rights Commission, the National Security Council, the U.S. Holocaust Memorial Museum, the Center for the Prevention of Genocide, the UN's Office on Genocide Prevention and the UN Security Council working group on the Responsibility to Protect. Her work had an international reputation.

157. As part of her work in fighting human trafficking, Atkinson conceived a mobile app to assist clinicians in identifying and intervening on behalf of trafficking victims. She developed a prototype and Mount Sinai Innovation Partners, a business unit within Mount Sinai, became interested and assisted its further development. The app attracted the attention of several external organizations, including Microsoft Corporation's Digital Crime Unit. Singh showed no interest in the app after he joined AIGH, did not even familiarize himself with it, and the project died.

158. Atkinson has also published numerous peer-reviewed articles. Since starting her full-time faculty appointment at Mount Sinai, she has published 17 peer reviewed academic papers.

She is first author on nine of them, senior author on four and second author on three. Further, she has published a number of policy papers, abstracts, blogs and opinion pieces. Atkinson has also authored invited chapters in *Hurst's the Heart* (a leading cardiology textbook) and in the American Medical Association's book, *The Master Adaptive Learner*. Atkinson also served as guest editor for a special issue of the *Annals of Global Health*, where she is currently an Associate Editor. She was pivotal in incorporating human rights into Mount Sinai's curriculum and established the current Mount Sinai Human Rights Program, which helps people, both in the community and in immigration detention centers, who experienced human rights abuses or torture in their countries of origin and are seeking asylum in the United States. The Program conducts expedited psychological, physical and/or gynecological evaluations to support the asylees' claims and offers a safe haven for survivors to receive medical support and share their experiences.

159. On January 28, 2015, Atkinson received an excellent annual performance evaluation from Landrigan, saying that she "exceed[ed] expectations." She was a significant figure at AIGH and beyond, expected to help lead and develop the Institute and its international reputation.

160. For the meetings Singh held with AIGH staff on April 7, Atkinson like other AIGH members had prepared a short briefing paper about her work. Her meeting with him lasted only about ten minutes. Singh never discussed Atkinson's achievements or plans and had evidently not read the briefing she had prepared. Instead, he lectured her condescendingly about how one of her fields of expertise, human rights, had no relevance to global health. Human rights are widely considered to be integral to global health, so Singh's ignorance disturbed Atkinson.

161. In mid-June 2015, Landrigan, who was stepping down as the Chair of the Department of Preventive Medicine, told Atkinson that her faculty appointment was not being

renewed, without any prior warning or explanation. Landrigan also told her it was up to Singh to decide if she were to remain at AIGH. In an e-mail on June 17, 2015 to Leslie Schneier ("Schneier"), Associate Dean for Faculty Affairs and Administration, and copied to Dr. Robert Wright ("Wright"), the incoming Chair of the then Department of Preventive Medicine, and Muller (Atkinson was not included), Singh wrote:

Per my records, Holly has no financial support for 2015-2016. I spoke directly with the board of trustee member [Gogel] who has not renewed the gift that supports her work, and who, unprompted, stated that he does not expect global health to provide bridge/future support.

I am not making new commitments on the core global health budget until we have completed our collaborative strategic planning process. As a result, I am not offering bridge funding for her position after her dedicated account ends (not sure exact date, but should be easily calculated based upon gift and payout rate).

I spoke with Holly briefly this evening at an event, where she stated that she would be with Med[ical] Ed[ucation]. She did not seem aware of the financial requirements to make that transition, which is what David e-mailed me about to clarify yesterday. It was not the right setting to clarify.

My understanding is that even though her funding is being routed through Prev[entive] Med, it is a global health budget responsibility. It seems like there has been a lack of planning for her funding post the ending of her gift, neither initiated by her nor prior stewards of global health personnel. Unfortunately, this means that there may not be runway for a phased reduction if her account is being imminently drawn down.

162. Singh was wrong on many counts. His implication that the Gogels' decision to not renew their gift reflected poorly on Atkinson's work was wrong. Their \$200,000 was a one-time gift, something they had made clear to Atkinson and Mount Sinai from the outset. Singh had never asked Atkinson about the conditions of the gift. More importantly, Atkinson was not expected or required to continue funding her salary. In fact, she was directly instructed by Murphy not to fundraise for her specific role or the Human Rights Program specifically. Instead, her salary was integrated into the AIGH budget, and after the Gogels' gift had been used, the Institute's general fundraising was going to cover it.

163. Two days later, on June 19, Singh called Atkinson to say that not only would he not pay her the salary she was due under her contract, but she could continue to work at AIGH only if she immediately agreed to worked full-time for \$90,000 a year, down from \$150,000 (she had been working temporarily for \$90,000, but for 3/5 time). Singh said that there might be further adjustments, including possible termination, after he finished his full review of AIGH later that year. Singh also withdrew the budget that allowed Atkinson to pursue her Master's in Public Health ("MPH") degree, the tuition for which was paid by Mount Sinai. Singh said that Atkinson needed to "prove" herself, although no other AIGH faculty or staff were subject to these conditions. In fact, this outcome appeared preordained.

164. Landrigan told Atkinson that he "should have told [her] six months ago" that her job was at risk, meaning he had known since January—at a time when Charney and Singh were negotiating Singh's AIGH operating budget—that Singh planned to get rid of her.

G. SINGH FAVORS HIS YOUNG MALE HIRES

165. In the summer of 2015, Landrigan was transitioning out of his role as chair of Preventive Medicine, Wright was taking over as the new chair, and AIGH was being set up under Singh. AIGH was to be relocated to leased space at the New York Academy of Medicine, one block away from the building where Atkinson and the global health group had worked.

166. The new location had only four private offices, located next to Singh's office in the central office area, with the remaining staff given open-air cubicles with little privacy. All but one office was given to or held open for Singh's new layer of male managers, including El-Sayed and Faghmous. Atkinson, far senior to them, was initially relegated to a cubicle in the main office along with the other women who worked in global health.

167. Then, Singh relocated Atkinson to an area (which used to be the cafeteria) down the hall from the main office area, where he placed the rest of the “legacy group.” Atkinson had to share an office (a partitioned area at the end of the long rectangular room) with Knaup, the newly hired Chief Operating Officer. Atkinson thought it was likely that Singh had put her with Knaup so she could report back to Singh on Atkinson’s activities and meetings.

168. Putting the legacy staff in a separate room down the hall allowed Singh to avoid them, and to embrace the young men who were proximate to him. At one point, Singh told Safo, “I hate meetings with these women.”

169. Indeed, Singh rarely even spoke to Atkinson. While he sometimes said hello in the hall, he more commonly did not acknowledge her, pretending to check his watch or answer a text message on his cell phone to avoid eye contact.

H. SINGH BELITTLES AND MARGINALIZES ATKINSON

170. One of Atkinson’s duties was to organize, develop and teach the Medical School’s two mandatory intensive week-long courses, InFocus 3 and InFocus 4. Singh downplayed their importance and her contribution, claiming she took way too long to prepare them; he told her he had organized larger conferences as a medical student in a fraction of the time, though he was vague on details. His implication was that she was an “old lady” unable to move fast and decisively. In fact, Atkinson developed groundbreaking curricula for the courses involving nearly 150 students and some 20 plus guest instructors and speakers. They were very highly regarded.

171. After the June 19, 2015 call, Singh excluded Atkinson from his projects at AIGH and mostly ignored her. When he did engage with her, Singh often assigned her work that was far below her capabilities and level, such as maintaining a MailChimp list and asking her to add

hundreds of new e-mail addresses that he had misappropriated from a United Nations Foundation mailing list, an intentionally menial task.

172. On September 18, 2015, Singh demoted Atkinson by changing her title of “Director, Human Rights Program” to “Program Director of Human Rights.” Although the change may appear small, in the academy’s intricate hierarchy of titles, this was a significant step down and loss of prestige. Like the earlier pay cut, the lesser title was another discriminatory act to prod her to go.

173. When Atkinson presented her strategic plan for the Human Rights Program in April 2016 in Singh’s office, he interrupted her moments after she started and viciously snapped that she was “not capable of doing this”—that there was no way she could deliver what she was proposing. As he talked, it became apparent that he had not read the documents she had prepared for him, so she asked him if he had done so. Singh responded with withering contempt, “I didn’t have to,” since he supposedly already knew that she could not succeed.

174. As Singh publicly insulted her capabilities, Atkinson’s anxiety and stress from the many months of being isolated, demeaned and discriminated against by Singh became unbearable. She burst out crying, unable to take his humiliation any longer. She apologized, blaming her tears on the fact that she was concerned about her 95-year-old father, who was dying. This was true, he was very sick at the time, but it was in fact Singh who made her cry, although Atkinson did not want to admit that to him. Singh placed his left hand high up on Atkinson’s left thigh and said, “Let’s do this with empathy.” She recoiled at his touch, which made her extremely uncomfortable and had an inescapable sexual overtone. She thought he might actually be propositioning her, sex in exchange for her job. She abruptly stood up, picked up her computer from his table, and left his office.

175. Terribly upset, Atkinson sought out Anandaraja. As she told Anandaraja how Singh had treated her, Atkinson sobbed and did not want return to work.

176. Singh spoke to Safo and said of Atkinson, “That presentation was an embarrassment; she is an embarrassment.”

177. Singh continued to disparage Atkinson, saying she was “unorthodox” and even that she was “conducting sex exams in the office at AIGH and exposing the group to liability.” He claimed, “Atkinson was out of control” and asked “who did she think she was, doing sex exams?” Singh did not explain what he meant by “sex exams” but the connotation was clearly that Atkinson was doing something unprofessional and illegal. The accusation was concerning to Safo, who asked what could be done to stop it. Singh assured her that he was “taking care of it.” This whole allegation against Atkinson was a breathtaking lie.

178. Singh repeated the baseless accusation that Atkinson was performing sex exams to others at AIGH, including Faghmous and, after Atkinson’s resignation, to a staff member in Mount Sinai’s development office.

179. This was not the first, nor the last, time Singh disparaged Atkinson to infect others’ views. Singh disparaged Atkinson to Safo as soon as Safo started working for in AIGH in September 2015. This darkened Safo’s opinion of Atkinson and caused her to distrust and exclude Atkinson from her work as much as possible. For example, when Safo arrived at AIGH and Atkinson invited her to lunch, Safo intentionally ignored the invitation based on Singh’s characterization of her. Safo never gave Atkinson a chance. Based solely on Singh’s remarks, Safo excluded her from projects and meetings, declined invitations to be a guest faculty for the courses Atkinson oversaw, and refused to cooperate with Atkinson, believing her to be incompetent and worthless. This ostracism from Safo continued until the day Atkinson left AIGH.

1. Atkinson decides to leave AIGH, but Singh does not let up

180. On April 18, 2016, Atkinson met with Singh to announce her resignation from AIGH. At first, Singh seemed extremely surprised, almost incredulous. Quickly, however, Singh could not hide his glee in his face, as he suddenly realized that he had succeeded in driving Atkinson out.

181. Humiliated and anxious, Atkinson asked Singh to support her in announcing her departure and transitioning out of AIGH. Specifically, she requested permission to announce her departure at the staff meeting the following day, to retain her Mount Sinai e-mail account since she would remain involved with the Human Rights Clinic and teach at Mount Sinai, and to collaborate on a systemwide e-mail announcing her decision. Singh agreed to allow Atkinson to speak at the staff meeting, but would not commit to helping her with her e-mail address or the systemwide announcement.

182. When Atkinson attended the staff meeting the next day and announced her departure, Singh did not thank her in the usual way for her service or say anything at all, once again underscoring that she had been forced out and humiliating her in front of her colleagues.

183. Throughout her last two weeks at AIGH, Singh continued to ignore and intimidate Atkinson. He continued to look away when they encountered one another as if the sight of her disgusted him. Although she needed to collaborate with him to effect her transition, Singh refused even to speak to her directly. Instead, he tasked Berman to coordinate with her. Knaup, with whom Atkinson shared an office, barely uttered a word to her. The tension and hostility were palpable.

184. Anandaraja had not been in the AIGH meeting where Atkinson announced her resignation, as she had been disinvited from all AIGH meetings earlier in the month (see ¶ 259).

However, Anandaraja heard from Ramon Murphy that Atkinson had officially resigned, and asked to meet Atkinson for coffee on April 26. They met at a café near Sinai, and Anandaraja told Atkinson that Murphy had said he was distressed Atkinson was leaving and Singh was wrong to have fired her.

185. Murphy had told Anandaraja that he had been trying to use his contacts at Mount Sinai to find another position for Atkinson, but found no one willing to help; he concluded that Singh's disparagement of both Atkinson and Anandaraja, and Charney's obvious favoritism towards Singh, had closed doors to both of them. Atkinson broke down in tears in front of Anandaraja. She had already been wondering why the Department of Medical Education (with which she had been affiliated) had not offered her another position and delayed paperwork necessary for her to stay on as an adjunct faculty member; it was distressing to learn that Singh had hurt her reputation more broadly. On May 11, after her resignation was announced, Murphy expressed his upset in an e-mail on May 11, writing "I feel as if there is a hole in my heart."

186. During her final days of employment, Atkinson worked to ensure that her commitments to the Human Rights Clinic were transitioned without interruption. On April 27, 2016, she approached Safo to request her help with asylum evaluations for the Human Rights program. As had happened many times previously, Safo declined and cut the conversation short saying that she had to leave for clinic. Once more Atkinson thought that Singh's disparagement of her had tainted Safo, causing her to refuse a reasonable request.

187. Singh's constant attack on Atkinson was no more apparent than on April 28, 2016, Atkinson's last full day working in the AIGH offices. Arriving at work that morning, she stepped out of the elevator and turned toward her office. Just then, Singh rounded the corner heading toward the elevator. True to form, Singh saw Atkinson, narrowed his eyes and glared at her with

a nasty smirk, clearly reveling in his triumph. Even on her last full day, Singh could not contain his disdain for her. The two shared no words, but Atkinson left shaken and deflated. She was in tears when she recounted the encounter to her husband later that night.

188. The following day, April 29, Atkinson did not dare ask for Singh's help ensuring her e-mail access remained intact lest she expose herself to more ridicule and humiliation, even though she still had commitments to the Human Rights Clinic and the Department of Medical Education. Atkinson was sure from Singh's constant hostility that he would not help her, and in fact would likely ensure that her e-mail access was terminated if asked again. So, after some effort, Atkinson gained the assistance of Paul Lawrence, Vice President and Associate Dean of Academic Informatics and Technology, who assured her access would remain active. Neither he nor Atkinson involved Singh in the discussion.

189. Throughout the twelve months that Atkinson suffered from Singh's ridicule and harassment, his whispering campaign that she was conducting illicit "sex exams" in her office while she continued to do her job with integrity, she felt that she had nowhere official to turn for help. Several senior faculty members, including Muller, knew that Singh was trying to drive her out but did not meaningfully intervene. Further, as Mount Sinai Human Resources had previously failed to help Rahona deal with Singh's onslaught and had told Rahona that Singh had *carte blanche*, Atkinson felt that HR could not and/or would not help her as Singh had been hand-picked by Charney.

190. Atkinson joined the faculty of the CUNY School of Medicine as Medical Student Advisor and Distinguished Lecturer, a level far below her experience, skill and seniority (but has since been promoted to Clinical Professor). Her final paycheck from AIGH, still reduced at Singh's direction, was paid on May 6, 2016.

191. Atkinson's and Anandaraja's resignations were announced together in an e-mail to all staff on May 11, 2016. Renee Bischoff ("Bischoff"), Program Director of Global Health Education, drafted the announcement for AIGH, and was asked by Singh to remove the word "resignation" as he was afraid it would reflect badly on his leadership, but Bischoff did not make the edit. The announcement was released from the office of David Muller, Dean of Medical Education, and Singh co-signed. The e-mail included this praise of Atkinson's work:

Since her arrival [Atkinson] has been an integral part of building our Human Rights and Social Justice Scholars Program, established and staffed the Human Rights Clinic for individuals seeking asylum, designed and implemented required core curricula on physician advocacy and human rights, and most recently has been a faculty mentor working with students to enhance our teaching related to spirituality and religion. Through all these endeavors, Dr. Atkinson has been a role model and always demonstrated a deep passion and commitment to those most vulnerable.

I. SINGH HARASSES ANANDARAJA UNTIL SHE RESIGNS

192. Dr. Natasha Anushri "Anu" Anandaraja served as the Director of Global Health Education at MSGH and AIGH between January 2008 and June 2016 but had been involved with Mount Sinai in other capacities since July 2002.

193. Anandaraja received her bachelor's and medical degrees from the University of Auckland School of Medicine, New Zealand, before coming to Mount Sinai for a pediatric residency from 2002 to 2005. She then completed a year-long Fellowship in Global Health through the Mount Sinai Department of Community Medicine, and a Masters' in Public Health with a concentration in Global Health at Mount Sinai in 2009. She also completed the Gorgas Course in Clinical Tropical Medicine in 2007 and earned Certification in Tropical Medicine and Travel Medicine through the American Society of Tropical Medicine and Hygiene in 2008. Anandaraja came to Mount Sinai with extensive experience in global health, having worked with non-

governmental organizations in rural health and development in India since 1995, and in disaster relief efforts in both India and Sri Lanka between 2001 and 2005.

194. Based on her extensive experience and prominent reputation in global health, Muller and Murphy recruited her in 2005 to be one of the founding faculty of MSGH. Together with her colleagues, Anandaraja designed and built MSGH's educational program. With support from Muller, Murphy and Landrigan, Anandaraja formalized and expanded the disjointed international activities existing at Mount Sinai into a centralized global health educational initiative, known as the Global Health Center ("GHC").

195. After MSGH's formation, Anandaraja's efforts to shape and fundraise for the program were critical to its growth and continued success. She wrote the first grant proposal for the creation of GHC that was ultimately funded by the Mulago Foundation, a fund supported by the Arnhold family. Anandaraja subsequently developed a strong relationship with the Arnhold family and procured several further gifts from the Arnhold and Mulago Foundations, totaling approximately \$3,000,000 between 2005 and 2013.

196. In recognition of her successes and dedication to MSGH, in 2008, Mount Sinai offered Anandaraja to become Director of the Global Health Training Program at MSGH. When MSGH evolved into AIGH, her title changed to Director of Global Health Education.

197. While at MSGH/AIGH, Anandaraja built the GHC into a nationally recognized and highly successful multidisciplinary, multi-level global health training program. The unique educational program spanned the Medical School, the Public Health program and six clinical residency programs, and included a dedicated Global Health Teaching Fellowship funded by the Arnholds. She designed the program to encourage experiential learning and worked with her colleagues abroad and at Sinai to establish multiple international partner sites for training and

collaborative research in India, the Dominican Republic, Kenya, Uganda, Ethiopia, Vietnam, Tanzania, Mozambique, and the U.S. The program became widely known, receiving national recognition from other medical schools, including Yale, Harvard, and Duke.

198. Over time, Anandaraja expanded the mission of the GHC to encompass not only the training of U.S. health care workers, but capacity-building at partner sites through educating their local health care workforce. She worked with international non-governmental organizations and national Ministries of Health to develop and support the training of traditional birth attendants and community health workers in Mozambique, pediatric and family medicine residents in the Dominican Republic, and pediatricians and nursing staff in neonatology in Colombia.

199. From 2005, Anandaraja coordinated the first ever Annual Global Health Conference at Mount Sinai. These conferences attracted internationally recognized experts and health professionals from the tri-state region. In 2011, the Global Health Conference also provided a forum for an inter-institutional poster session to allow trainees from across New York State the opportunity to present global health-related research.

200. In 2012, Anandaraja and colleagues created and recruited for Mount Sinai's first formal Global Health Fellowship. The first of its kind nationally, the Global Health Teaching Fellowship drew national recognition because it focused on medical education rather than clinical care, accepted physicians from all specialties, and provided for a full year immersion experience without requiring doctors to look after patients in U.S. hospitals. She also created a five-year specialty track in Global Health for medical students that included GH courses, summer field work, a full year of scholarly GH work, and a funded two-year Master's in Public Health. This was the first of its kind in the U.S.

201. In 2014, after many years of advocating for inclusion of Global Health in the mandatory medical school curriculum, Anandaraja and Atkinson launched the Global Health, Human Rights, and Advocacy InFocus weeks as part of the Department of Medical Education's larger Infocus initiative, making Mount Sinai one of the few American medical schools to include these vital disciplines in the core curriculum.

202. Anandaraja was also active in fundraising, working with the Development Office and Advisory Board to identify and approach major sources of private foundation and donor funding. Her significant success and leadership in this area allowed continuous growth of the program from 2007. In 2012, Anandaraja hosted two Advisory Board members at the MSGH project site in Mozambique, increasing donor commitment through direct experience with the programs.

203. During her time as Director of Global Health, Anandaraja also served at various times as an Attending Pediatrician in Mount Sinai's Pediatric Associates practice, was an Assistant Professor in the Department of Pediatrics and Department of Education and directed the Pediatric Travel Medicine Clinic. In May 2012, Anandaraja received the Dean's Award for Excellence in Teaching, one of many recognitions she received from Mount Sinai for her research, global service, teaching and program development.

204. In 2007, Anandaraja led an initiative to convene the first Consortium of New York Global Health Educators at the New York Academy of Medicine. In 2009, she was invited to join a working group convened by the Associated Medical Schools of New York to form a Global Health Committee, and in 2010 became its co-chair. In this position, Anandaraja took a leadership role in coordinating and teaching in New York's first Global Health Forums in 2009, 2010 and 2011 which, for the first time, brought together NY-area global health educators from medicine,

public health, dentistry and nursing. In 2014, in collaboration with Weill-Cornell Medical College and the Associated Medical Schools of New York, Anandaraja, with help from Atkinson, organized a TEDx-style conference which drew attendees and renowned speakers from institutions across the U.S.

205. By all accounts, Anandaraja's work to build the MSGH Training Program was critical to the success of the global health program and its support by the Arnhold family. Anandaraja led the work on the very first grant proposal for MSGH and every subsequent funding report and proposal to the Arnholds. She met with them and communicated with Starr several times a year for this purpose, and her work was instrumental in maintaining this funding stream. Along with Murphy, Anandaraja met with the Arnholds to secure the \$12.5 million gift that transformed MSGH into AIGH and allowed Singh's hiring as Director.

1. Singh prejudices and sidelines Anandaraja

206. Anandaraja found that Singh's attitude towards her was dismissive from the start. Soon after his appointment as AIGH Director was announced in early 2015, the AIGH development team arranged a meeting to introduce Singh to the Arnholds. As usual for meetings with the Arnholds, Anandaraja was included. She and Murphy had maintained the relationship with them for a decade by that time, and she was the Director of Global Health Education initiative to which the Arnholds had specifically donated. However, a week before the meeting, the Development Department told her that Singh was disinviting her. She was shocked: she was the only one being excluded. Murphy, a male member of the "legacy team," was still going.

207. Anandaraja e-mailed Singh to gently ask why on March 15, 2015:

I had a call from the Development Office yesterday afternoon letting me know that I will no longer be attending the meeting with the Arnholds in early April. This came as a surprise to me and I wondered whether you were aware of this decision and could shed any light on the rationale behind it. As you know, Sigrid and I have

been working with the Arnholds for almost a decade now, and have formed a close relationship with them and generally meet with them for all updates regarding the program. I wish we had had the opportunity to discuss this when we spoke. I understand that you are juggling many agendas and tasks currently, but any insight you could lend to this situation would be much appreciated.

208. Singh's response implied that his decision had been made in collaboration with Charney and the Development Department (although they denied being involved), and made clear that he would no longer let her interact with the Arnholds directly, which was to be reserved to him.

Hi Anu-

Thank you for your email.

I have discussed this meeting and its goals with Dean Charney and with Development:

The purpose of this meeting is to introduce me to the donor as the new institute director and to establish a direct line of communication, which is duly reflected in the meeting's composition.

You and I will have plenty of time to discuss program related updates over the next year, and I am counting on your insight in shaping how Institute updates are conveyed in the future.

I appreciate your understanding of why this courtesy is being extended to me as I transition into my new role."

209. This answer demonstrated that although Singh had not yet officially taken over AIGH, he was determined to sideline her as a leader by cutting off her relationships with important AIGH stakeholders that had brought great benefits to Mount Sinai.

2. Anandaraja faces ageism and sexism

210. In spring 2015, Singh informed Anandaraja that he was hiring El-Sayed and that she would be working under him. During El Sayed's first meeting with Anandaraja he told her that he was particularly excited about working at AIGH because Singh had promised El Sayed that he was building a "young" team. El-Sayed said specifically that he was excited to not be working

with “anyone over 40.” Anandaraja herself was 41 at the time of that conversation. It was evident to Anandaraja that Singh was using the promise of a “young team” in his recruitment pitch to prospective employees, and that she herself was not considered young.

211. In July 2015, El-Sayed left to take up an opportunity in Michigan. Singh did not offer the Associate Director position to Anandaraja, although the job responsibilities were ones that she had managed excellently for years before Singh’s or El-Sayed’s arrival. Within a year, Singh had also hired Kishore, another young man in his 30s, as Associate Director, once again putting Anandaraja under a man younger, less accomplished and less qualified. Singh’s message was clear: young men were valuable and older women were not, regardless of their achievements, exceptional contributions and academic merit.

212. Singh voiced his preference for younger employees several times in his early months at Mount Sinai, including at his first meeting with the Advisory Board where he spoke of his intention to build a dynamic group of *young* researchers. As a 41-year-old woman, the age-related comments made by Singh and his newly recruited young male leaders and Singh’s obvious disdain for older female colleagues and Advisory Board members made Anandaraja feel unwelcome, unvalued and discriminated against.

213. Singh’s bias towards supporting men is reflected in his participation in a group called the “Curry Club,” which Singh described as a group of Southeast Asian men who met over dinner at Indian restaurants and were successful professionals from all walks of life. They were tired of white men dominating the global stage and had agreed to meet to change the world order. The group was open about their intent to be a brown Boys Club to do each other favors, advance their businesses and careers, and eventually dominate their industries and their respective societies.

3. Singh denigrates Anandaraja's work and abilities

214. Singh regularly denigrated Anandaraja's work with cutting critiques. He denounced the training initiatives she had built as worthless, outdated and beyond repair. He frequently commented with sneering surprise at the amount of time she and her team put into preparation for medical student courses, boasting that he himself had created more complex courses in far less time. Singh's insults were always given verbally, and he was careful not to leave a paper trail demonstrating his frequent cruelty. When he made particularly harsh or sarcastic comments, he would sometimes send kind follow-up e-mails that allowed him to appear less demeaning.

215. Like others outside Singh's charmed circle, Anandaraja was blamed for setbacks to his plans and self-regard whether she was responsible for them or not. Anandaraja attended a meeting with Singh and Muller at which Singh delivered a presentation about a partnership that he planned to implement between AIGH and a consulting firm, Gerson Lerman Group ("GLG"). Singh's fascination with the consulting world, and his wife's prior association with GLG as one of their "Fellows," had motivated him to introduce this non-traditional, corporate-style partnership into the more traditional curricular offerings that Anandaraja and her team had designed for the medical school.

216. Afterwards Muller called Anandaraja to tell her that he had not understood at least 60% of Singh's presentation (in fact, it was widely remarked in AIGH and across Mount Sinai that Singh often did not make sense as he strung together big words and concepts that he did not fully command). Anandaraja explained Singh's proposal in a way that Singh had not been able to, after which Muller said he would be willing to move forward after speaking to other Deans. Muller then presented the GLG partnership plan to the team of Associate Deans responsible for medical

education, who opposed it because they thought that Singh had approached GLG too quickly and without seeking their approval first.

217. Though their concerns were reasonable, Singh was furious. He took no responsibility and instead blamed Anandaraja, accusing her of ruining the project and his relationship with the Deans in question. In fact, she had attempted to salvage his project, and the Deans' disapproval was solely due to Singh's decision to ask GLG before asking the Deans and his already poor reputation within the institution.

218. Afterwards, Singh berated Anandaraja, calling her incompetent and lacking in judgement, and implying that she was disloyal and had somehow sabotaged his project. He instructed Anandaraja to no longer speak with anyone at Mount Sinai's senior leadership without Singh himself being present. He specifically forbade Anandaraja to meet with Muller, her long-time mentor. Singh told Anandaraja that it was clear to him that she could not handle herself or represent AIGH in high-level meetings. This was ridiculous and obviously intended to insult, given her track record at AIGH and the large number of successful partnerships she had forged both inside and outside Mount Sinai. As an additional gibe, Singh told Anandaraja to hire an executive coach to help her through her "communications issues." He also threatened to cancel her upcoming field trip to Mozambique, claiming that she had failed to prove she could handle her responsibilities at Mount Sinai, let alone international partner sites.

219. Singh used the same playbook toward Anandaraja as he did towards other older women, including Atkinson: he dismissed everything they did as awful. In his early days at AIGH, Singh asked Anandaraja to create organizational charts to illustrate the structure of AIGH educational programs and staffing. She produced several iterations; he called them all useless. He said her failure to have this basic skill was shocking, a sign of incompetence. At his previous

institutions, he said, the staff never had any trouble producing clear charts. When Anandaraja asked him to send her an example chart he liked, Singh said he should not have to. He later sent the entire AIGH staff an e-mail referring them to the Wikipedia page on organizational charts, which was clearly intended to condescend and was not useful.

220. Singh instructed Anandaraja to have her work checked by unqualified new hires. He suggested that she “review [documents] with Abdul [El-Sayed] or Kirsten [Knaup],” both new to AIGH and with far less experience than Anandaraja, “to ensure that the information [was] easy to understand” before sending it to Singh. Singh’s clear implication was that Anandaraja’s work was inadequate and incomprehensible and that she should defer to younger employees.

221. At a private meeting in Singh’s office on May 18, 2015, before he had officially started as Director, Anandaraja presented him with a budget for her programs following Mount Sinai’s standard formatting and structure. Moments after he began reviewing it, Singh threw the document down on the table and yelled at Anandaraja that her work was impossible to understand and useless. Singh declared that he had been frustrated with all the “legacy staff” and doubted their competence. He said it was obvious that Anandaraja did not know what she was doing and lamented that no one at AIGH could provide what he needed. When Anandaraja asked Singh what he wanted given that he found Mount Sinai’s standard budget format unsatisfactory, Singh told her that he needed a “narrative budget,” and when Anandaraja said that she would be happy to rework the budget if he could give her an example of such a budget, he became angry again, stating that he should not have to explain to his staff what he needed. He then stood and held the door of his office open for her to leave.

222. The work environment that Singh created was so pressured, despite there being no clear idea of what his staff were working towards, that Anandaraja even found herself working on

an “educational thesis” on Christmas Day 2015, while she was on a vacation day. This work was demanded but then discarded, like so many other documents that Singh insisted were crucial but then failed to read, let alone utilize. At other times, especially in the early months of his tenure, Singh directed that programs or systems be dismantled, only to later blame Anandaraja and her colleagues when they no longer existed.

223. It was specifically female employees who were subjected to this level of scrutiny, criticism and pressure. It was evident to Anandaraja that Singh was purposefully undermining her self-confidence and trying to frame her as incompetent in front of her colleagues. In one-on-one meetings he consistently made snide remarks about the quality of her work without giving clear guidance on what was needed, and constantly shifted his expectations so that it was impossible to meet them.

224. During weekly leadership meetings, Singh would have a consistent stream of vague ideas for education programs, but the goals always shifted—Singh’s mantra was to “be innovative” but without a clear direction. He used these shifting goals to consistently undermine Anandaraja. As soon as she made progress in one way, Singh would shift the goals so that it was impossible for her to succeed.

4. Anandaraja observes ethical problems

225. Anandaraja also became concerned about Singh’s ethics. Early in his tenure, she witnessed him using work he had lifted from the Peterson Institute with potential clients of the Arnhold Institute. On one occasion, Singh asked her to attend a meeting with a group from the Ministry of Health from Chile during which he showed them a Peterson Institute-branded slide deck and told them that he could help them redesign their entire primary health care system.

226. The promises Singh made were overblown, and when Anandaraja asked him after the meeting whether the project was something that AIGH could actually take on, he said of course not, but that it was good chance to build their reputation. Singh went on to tell Anandaraja that it was all about marketing; he gestured to a bookshelf in his office that was full of books on leadership and management and said that it was important to know the language. Singh said that he had sold Charney a plan to save the health system billions by redesigning Mount Sinai's primary healthcare system, and that he was the only person at Mount Sinai smart enough to understand the concept. He said he found it easy to talk circles around people like Charney because they were basically self-absorbed and did not understand most of what he was saying but were impressed enough to let him do what he wanted.

5. Singh cuts Anandaraja's initiatives

227. Despite AIGH's receipt of \$12.5 million from the Foundations to expand its educational and training work, which Anandaraja had built and directed, Singh immediately sought to cut it. He refused to recognize the worth of these programs or their importance to AIGH's reputation as a leading global health center. He treated Anandaraja's decade of work as a waste of money to be eliminated as fast as possible, even though it had been an important element not only of AIGH's output but its fundraising.

228. On September 17, 2015, Singh told Anandaraja over the phone that he would reduce the budget for her global health educational programs by 60% for the current academic year. That year had already begun, so Anandaraja had already committed to paying staff and programs. Singh did not care and charged her with terminating or reducing the salaries of her longtime colleagues.

229. In addition, Singh instructed Anandaraja to cease work and expenditure on existing health programs that AIGH supported in low-income countries, despite her warnings that this

would tangibly endanger the health and well-being of communities and patients across the globe. He even forced Anandaraja to suspend training programs in which students and resident doctors had already enrolled and for which they had chosen Mount Sinai. Singh did not explain where the money would be redirected.

230. When Anandaraja sought Singh's assistance in speaking to terminated staff, as she did not understand the reasons for their termination, he refused. He said that he had hired and fired more than 70 people in his previous positions, and was disappointed Anandaraja was not prepared to do so herself. Rather than explain the terminations, Singh condescendingly offered Anandaraja books on leadership and advised her to improve her management skills. He insisted on keeping his own hands clean.

i. Gorongosa Restoration Project

231. Singh also threatened to terminate Anandaraja's field projects. Anandaraja had developed a strong partnership between AIGH and the Gorongosa Restoration Project in Mozambique that hosted students, residents and fellows for training, and with which the Institute had built a community health worker system. In August 2015, Anandaraja was in Africa to mentor one of the Global Health Fellows in Mozambique and to visit organizations in Malawi and South Africa as part of her vetting process for a new executive course she had been developing with Landrigan. Singh ordered her to cut short her trip and return to New York. He told her he would not support the modest travel budget of approximately \$3,500 that had already been approved by Landrigan for her Program Coordinator to join her for meetings in South Africa. He declared that he did not support these efforts, did not understand them and wished her to attend a three-hour retreat that he organized in New York instead. Anandaraja had no choice but to cancel her

Coordinator's travel, cut short her own visit, and comply with his demand to return to New York. Soon after her return, work on the executive course was cancelled, and the Coordinator was fired.

232. Although Anandaraja's project in Mozambique had been built over many years and had resulted in the training of a nationally recognized group of Community Health Workers ("CHWs") and Traditional Birth Attendants, who had clearly saved thousands of lives, Singh had apparently never read the briefs she prepared for him, and had avoided or delayed any conversations about the Mozambique portfolio of work. At one point Singh was trying to identify a cadre of CHWs to assist with his ATLAS project (see ¶¶ 268-276), but when Anandaraja told him that AIGH had already developed a cadre of CHWs ready to mobilize in Mozambique, he denigrated their capabilities and her work with them.

ii. USAID meeting in Mozambique

233. In November 2015, Singh again attempted to block Anandaraja's field work, threatening to cancel a trip to Mozambique during which she was to attend a high-level meeting with USAID, a major funder of AIGH's projects in the country. He referred to the meeting as merely a "meet and greet," and insisted that Anandaraja create tedious and unprecedented documentation to justify the time and money she would be spending on the trip, even though the budget was small. Anandaraja's many years of experience successfully managing field sites and international partnerships appeared to threaten him, and he was determined to undermine her work.

234. Even Knaup noticed the inappropriateness of Singh's behavior towards Anandaraja. In her response to Singh's "meet and greet" e-mail on which she was cc'd, she replied only to Anandaraja and said "[I] [w]ant to say something I don't want to commit in writing," and then told Anandaraja in person that she shouldn't let Singh demean her by diminishing her work and micromanaging her.

235. In comparison, international travel plans for Singh or his male staff were breezed through, and he traveled in fine style, hiring limousines and staying in top hotels.

236. Singh also attempted to undermine Anandaraja's reputation as a competent and honest manager of field work, making it difficult for her to gain the cooperation of her colleagues. On one occasion, Singh falsely told Safo and others in AIGH that Anandaraja had abused AIGH resources and subjected it to a scandal because she had taken her partner on a global health trip and was spending the Institute's money on him. Singh lied: Anandaraja never took a partner with her on a field trip during her employment at AIGH. But Safo did not know that: she was appalled as Singh intended, wondering why Anandaraja could be so brazen and inappropriate in a professional environment. Safo determined that Anandaraja was not somebody with whom she could work and actively sought to avoid her whenever possible.

6. Singh demotes Anandaraja

237. In September 2015, Singh changed Anandaraja's title from "Director of the Global Health Educational Program" to "Program Director for Global Health Education," effectively demoting her without changing her responsibilities. The step down from the senior level of "Director" to the junior level of "Program Director" reflected poorly on Anandaraja within internal institutional and academic circles, and in her external relationships throughout the global health community. Anandaraja's functional title of "Director" reflected the high level of experience and responsibility she held at MSGH and AIGH since 2008, overseeing the management of multiple educational programs, trainees, staff and faculty in several countries. Being demoted to "Program Director," listed publicly on the AIGH website, on her business cards and necessarily reflected on her CV, reduced the importance of her role, belittled her responsibilities and experience, and implied that she had been unfit for the Director role. The demotion was particularly jarring as

Singh had been hiring young and inexperienced men like El-Sayed (and subsequently Kishore) into more senior positions. Demotions were also applied to a number of other “legacy” employees at the same time – including Atkinson, Bischoff and Aparna Dandekar. A Program Coordinator, Jessica Batista, was fired outright a few months later. All five of the casualties were women with excellent records, and three of the five were women of color.

238. Anandaraja was officially notified of this round of functional demotions on September 9, 2015 when Singh and Knaup described the new organizational structure and titles. There was no room for discussion. Knaup strongly advised Anandaraja not to object because Singh needed flexibility to create his start-up environment. Knaup said that Singh had anticipated that Anandaraja would be unhappy, but that she would not be seen as a team player if she questioned his actions.

7. Anandaraja resigns

239. In December 2015, after returning from the field trip to Mozambique, Anandaraja returned to a tense atmosphere at AIGH. All of the staff she worked closely with were unhappy, stressed and confused by Singh’s repeated vague but insistent demands and changes of course. She was also deflated given how Singh was treating her. Still, she tried to shield Bischoff and her colleagues from having to interact with Singh directly.

240. Over time, this took a toll on Anandaraja. She had lost so much weight over the preceding months that her colleagues expressed concern. She had other physical symptoms of stress, including greying and loss of hair, which they also noticed. She had always loved work, but now found it exhausting and draining.

241. Knaup noticed this and requested a meeting with Anandaraja just before she went on holiday. Knaup opened the meeting by saying it was obvious that Anandaraja was not doing

well at AIGH. Knaup said that she was worried that Anandaraja was unable to get on board with Singh's vision for the Institute and advised that she should resign lest she hold back the entire team. Anandaraja was taken aback, feeling distinctly that she spoke at the behest of Singh who obviously wanted her to leave but was also not brave or decent enough to talk to her directly. Anandaraja told Knaup that she would let her know when she returned from holiday.

242. Anandaraja reflected on how the hostile work environment Singh created affected her, and decided to resign. Though she did not have another position lined up, she could no longer stand going to work.

243. After the holiday she told Knaup, who suddenly changed tack, as if their previous conversation had not taken place, and tried to dissuade Anandaraja from resigning, saying it would make Singh look bad. Knaup seemed more concerned about the optics of Anandaraja's departure than her wellbeing, and Anandaraja again had the feeling that Knaup was anticipating Singh's concern about how her resignation would reflect on him. Anandaraja would not change her mind.

8. Anandaraja discusses her resignation with Singh

244. Anandaraja sought to tell this to Singh directly, but he repeatedly rescheduled their meetings so that it took a month before she was able to see him, while he was walking between meetings. Anandaraja was very uncomfortable discussing her resignation with Singh on the street, with no privacy and while he was rushing from one place to another, but since this was the only way he would talk to her, she acquiesced and told him she was resigning.

245. When they reached Singh's destination, he turned to Anandaraja and suggested she consider working for AIGH on a fully remote basis, in the field, in lieu of resigning. Anandaraja said she would consider this and suggested they meet again later in the week to discuss this further.

246. On the day of their subsequent meeting, Singh arrived 15 minutes late and visibly upset. His tone was a stark departure to the conciliatory approach he had on their walk. He abruptly demanded to hear Anandaraja's decision. Anandaraja informed him that while she appreciated his offer to reconsider her role, she felt it was time to move on.

247. Singh then asked Anandaraja to continue working for AIGH through June and requested that she not tell anyone she was leaving. With Atkinson's and Anandaraja's resignations so close together, Singh told Anandaraja he worried about the "bad optics" that these two departures would create for him and AIGH among members of the Mount Sinai community and donors. Singh knew he had driven out two pillars of AIGH and feared their contemporaneous exits would reflect poorly on his leadership.

248. He told Anandaraja that her departure was leaving her colleagues in a difficult position and, guilt-tripping her into staying, asked her how she expected Bischoff to manage without her. Anandaraja replied that she was giving proper notice and that she would make sure Bischoff and the rest of her team were well-placed to continue with their work after she left. Singh then pressured Anandaraja to stay until the end of the 2016 academic year, to which she reluctantly agreed. She knew of Singh's vindictiveness and worried that he would badmouth her to other global health institutions, making it harder, if not impossible, for her to find a new job elsewhere. Anandaraja and Singh agreed that she would not leave AIGH until June 2016 and work remotely for a portion of it—something that Anandaraja requested to create some distance between her and Singh to alleviate the anxiety he caused her; she was so traumatized by the hostile environment he created at AIGH that she could not bear being around him every day.

249. Singh further demanded that Anandaraja not discuss her plans with anybody on her team or elsewhere at Mount Sinai. He insisted on single-handedly deciding the timing of an

appropriate announcement to the staff, all in an effort to exercise damage control over his brutal eviction of two women who had been central to the Institute's growth and success, and who were beloved for their dedication and contributions.

9. Singh becomes even more hostile towards Anandaraja in her final months at AIGH

250. After Anandaraja told Singh she was leaving, he did not let up on his bullying. He demanded that she train replacement staff and complete a thorough handover of her projects, but then disinvited her from meetings needed to do so. Singh stopped speaking to Anandaraja and ignored her requests for meetings necessary for an efficient transition. Though Anandaraja cared deeply about AIGH and did not want her departure to interrupt its work, Singh's disdain for her made a smooth exit impossible.

251. Although Singh had demanded that Anandaraja not talk about her leaving AIGH, he had been doing so anyway. By March, many colleagues, including Murphy and Karani, told her that they knew she was leaving AIGH, which made her uncomfortable. She had delayed formally resigning at Singh's request, but now that the "cat was out of the bag" because of Singh, she submitted the formal letter of resignation on March 8, and on March 15, she sent a letter announcing her departure to some colleagues in the Department of Medical Education (where she held a faculty appointment). She remained very concerned that her close colleagues would otherwise be hearing about her resignation indirectly, and that the reasons Singh would give would be inaccurate and detrimental to her reputation and the relationships she had built at Mount Sinai.

252. On April 14, 2016, Anandaraja's colleague at AIGH, Stapleton, sent her an e-mail mentioning casually that Anandaraja was leaving—meaning Singh or Knaup had let the cat out of the bag. The same day, Singh also released a new version of the AIGH organizational chart, from

which Anandaraja had been removed. This obviously signaled to her colleagues that she had been relieved of her duties.

253. To prevent Singh misrepresenting the reasons for her departure, Anandaraja told him that she wanted a public announcement. Bischoff, one of Anandaraja's direct reports (and another "legacy staff") drafted the announcement for Muller's signature. Bischoff wrote that both Atkinson and Anandaraja were resigning their positions: Singh told her not to tell the truth, and to position it another way. Muller was willing to sign the draft as constructed, and thus the announcement went out on May 11, 2016 under both Muller and Singh's name, praising Anandaraja's work:

Anandaraja has been part of the Mount Sinai family for over a decade and was one of the core group of faculty who launched our global health programs when she first arrived. She built a comprehensive infrastructure that has provided countless students, residents, and faculty the opportunity to participate in structured scholarly global health experiences in the United States and abroad. Over the past three years, with an outstanding team that included Renee Bischoff and others, she developed and implemented a global health curriculum for all medical students that has been enormously successful. In addition, [Anandaraja] mentored countless trainees across the continuum of education. Going forward, [Anandaraja] will focus her work on field-based maternal and child health programming with partners in Africa and India.

254. Murphy was devastated by Anandaraja's resignation. For years, she had been his right hand and a real co-architect of MSGH and AIGH. Now he was seeing what they had built dismantled as Singh deliberately drove people out and others left because they did not want to work with him, and he was dismayed. Speaking of Anandaraja and Atkinson, Murphy replied to Muller:

I feel as if there is a hole in my heart. These are 2 remarkable human beings, colleagues and friends. They each made us better people, and doctors, and Mount Sinai a changed and better place. Ramon

255. Murphy was even more forceful in an e-mail to a fellow pediatrician at Mount Sinai,

Dr. Ian Holzman:

[Anandaraja] quit, her boss assigned by [Charney], who did not follow our search committee suggestions, is a travail....and she was a large part of the reason we got the \$ which he is now spending in an unusual fashion....a real source of difficulty.

10. Singh continues abusing Anandaraja until her final day

256. Having convinced Anandaraja to postpone her resignation so that it would not look bad for him, Singh nevertheless continued to ignore, exclude and degrade her.

257. One of Anandaraja's projects, co-led with Ripp, was a redesign of the Institute's Global Health Residency Programs. In late April or early May 2016, Anandaraja was due to attend a meeting with Ripp, Singh and various stakeholders to discuss it. When Anandaraja arrived in AIGH's offices, Andrew Randall ("Randall"), Singh's Executive Assistant, told her that Singh directed that she be barred from the meeting. Randall looked visibly uncomfortable and so Anandaraja, who was stunned at the development, did not press him for further detail and left the building.

258. Anandaraja learned that the meeting did not go well and that Singh was not content with the project's progress. When her colleagues, including Ripp, asked why she was absent, she told them that she had been taken off the project. She was unable to add that this was due to her imminent departure because Singh banned her from discussing this. As a result, her colleagues were left either to speculate about why she had been taken off the project or hear Singh's negative spin about it, both of which were damaging to her reputation.

259. In fact, Singh instructed Randall to remove Anandaraja from all future meetings. Singh appeared agitated and aggressive to Randall, so he followed up to ask "remove her from *all* meetings?" to which Singh replied "yes, all," turned abruptly and left.

260. Singh never discussed his directive with Anandaraja directly, choosing instead to avoid her where possible. She occasionally found out about meetings on her projects indirectly through her colleagues and tried to attend them regardless of Singh's banning order. Anandaraja was still responsible for the work and wanted to aid the rest of her team, particularly as her departure neared.

11. Singh disparages Anandaraja to her colleagues

261. Anandaraja subsequently learned that Singh had been disparaging her to her colleagues. He told at least two of them—Murphy and Bischoff—that she had not performed adequately and had actively undermined their work. Singh conveyed that Anandaraja's departure was not a loss, but rather a necessary step for AIGH's success. Singh's misrepresentations undermined friendships and working relationships they had built over many years and caused a particularly significant rift between Anandaraja and Murphy, a close mentor.

262. Bischoff later told Anandaraja that Murphy had come to her office in a distressed state after a meeting with Singh and asked Bischoff whether she had told Singh that she had actually been doing Anandaraja's work for her. Bischoff denied this and confirmed to Murphy that the aspersions on Anandaraja's work ethic had come directly from Singh, and that she herself had heard them directly from Singh also. Singh clearly lied.

263. Murphy spoke with Anandaraja in late June 2016, related Singh's accusation that Bischoff had really been doing Anandaraja's work for her and asked Anandaraja whether there was any truth to it. This was a very distressing conversation for Anandaraja, especially as Murphy and she had been close. It was also extremely concerning to Anandaraja to know that Singh was bad-mouthing her within the institution as she was hoping to secure a contract with the Department of Medical Education from July that might lead to full time work. Singh's behavior could

significantly damage her future employment opportunities, and she had no idea how far it could reach.

264. A couple of weeks after receiving the phone call from Murphy, Anandaraja called Knaup. Knaup did not deny that Singh had been disparaging Anandaraja, but seemed very agitated and worried that the reports of defamation had gotten back to her. She begged Anandaraja not to speak about it to anyone else, warned her against making a big deal out of it, and expressly advised her not to confront Singh. Knaup asked Anandaraja to meet, and on July 19, 2016, they met at a café close to Mount Sinai. At the meeting Knaup admitted that over the preceding weeks Singh had indeed been framing Anandaraja's departure as a necessary step for AIGH to flourish, and contending that she had failed to meet his work expectations. When Anandaraja expressed her horror that this was occurring, Knaup tried to convince her that it was to be expected as Singh obviously needed to ensure that her departure was not seen as his failure. She repeated Singh's party line that his propaganda about Anandaraja was necessary for the good of AIGH and that Anandaraja should "let it go." Knaup claimed that she was worried about Anandaraja's mental health, that she was too churned up about Singh and that no good would come of her taking it any further.

265. Anandaraja deduced from this conversation that Singh had tasked Knaup to dissuade Anandaraja from taking action against his campaign of denunciation, and that if Knaup failed Singh would be angry at her. Anandaraja was deeply worried about being defamed, but also concerned that confronting him further could result in Singh doing even more damage to her reputation, and so took no further action.

266. Anandaraja left AIGH on June 30, 2016, though she continued to teach InFocus courses and consult on a project basis for the Department of Medical Education. She returned to

Mount Sinai part-time from September 2018 until October 2020 as the Program Director for the Office of Wellbeing and Resilience (“OWBR”) in the Office of Dean Charney, a position that did not require any direct work with Singh (see ¶¶ 400-404 for more detail).

J. SINGH LAUNCHES ATLAS, A KEY PROGRAM, AND HIDES ITS SHORTCOMINGS

267. As Singh was cutting AIGH’s core programs and forcing Rahona, Atkinson and Anandaraja out of the Institute, he also started developing his own projects. The most significant was ATLAS, a system intended to combine satellite imagery and demographic data using artificial intelligence in a way that would help rural communities improve health care. Even though ATLAS was Singh’s baby, with no “legacy” staff to hold him back, he made multiple promises about it he could not deliver and ended up lying to donors about it to cover up his failures. Meanwhile, even for the new, younger women brought in to work on his glamorous new program, he made AIGH a miserable place to work.

1. Beginnings of the ATLAS project

268. In the early summer of 2015, El-Sayed, then still slated to be Singh’s deputy, recruited Faghmous to join AIGH as its Chief Technology Officer. Faghmous came from a tech background—his Ph.D. research focused on applying artificial intelligence methods to better understand global climate change. Faghmous knew and respected El-Sayed and thought AIGH showed promise to become a leading global health institute.

269. Faghmous started working at AIGH in July 2015, working directly under Singh as El-Sayed had surprisingly left in the interim.

270. Singh was very enthusiastic about the prospect of AIGH developing a digital atlas of health care information that would help rural health care workers direct resources more accurately, which he called ATLAS. Faghmous was confused by Singh’s strong backing for

ATLAS, because it had no independent funding and it was still vague what precisely this digital atlas would accomplish and how it could be made to work. After discussing it with Singh more, Faghmous concluded that Singh was excited mostly at the prospect of riding the wave of “tech” and artificial intelligence that was getting a lot of attention.

271. At first Faghmous kept away from ATLAS. He was not interested in building up Singh’s political profile using cool-sounding buzzwords; he wanted to develop real projects with clear parameters and deliverables. Faghmous could see that Singh had committed to ATLAS without thinking about the work and staff it would need to produce results. So, for the time being, Faghmous focused on developing AIGH’s technology infrastructure, creating concrete projects that integrated social, economic and health data, hiring new staff and creating a strong Data Science team.

272. Singh was still focused on creating a “cool” tech product as a marker of his leadership and was put in touch with Dr. Trevor Mundel (“Mundel”), president of the Global Health Program at the Gates Foundation in Seattle. In June 2016, Singh requested that Faghmous fly to Seattle with him and Berman to pitch ATLAS to Mundel to gain funding. The meeting also intended to connect AIGH with other partner organizations that were interested in collaborating on ATLAS, including Deb Roy from Massachusetts Institute of Technology, James Kondo from Twitter and Gus Ruchman from the United Nations Special Envoy Office.

273. From Faghmous’ viewpoint, the meeting was excruciating. Singh described ATLAS as a finished product, though it was really just an unpolished idea. He told the Gates Foundation that ATLAS had active users, which was a fraud—there were no users. He told them ATLAS had prototypes out with customers, which was also a fraud; at the time, AIGH did not even have staff working on ATLAS. To make matters worse, Singh could not even answer basic

questions, and had a disagreement with Saara Romu, a program officer at the Gates Foundation who asked probing questions.

274. After that meeting, Faghmous decided to take over ATLAS. He was disturbed by Singh's calculated misrepresentation and felt ethically bound to take control and protect AIGH's reputation from Singh's hype. A few months later, in the fall of 2016, Faghmous presented ATLAS at a USAID innovation competition, where organizations pitch ideas hoping to find a funding partner. ATLAS ended up partnering with Dimagi, a mobile data collection software company, and received a \$300,000 grant for a one-year pilot program to develop proof-of-concept in Guatemala.

275. Singh continued to market ATLAS to various organizations and donors including USAID and the Arnhold Foundation. He regularly claimed it had active users (it still did not) and had built infrastructure in AIGH partner countries (it still had not).

276. By summer 2017, Faghmous could not justify staying at AIGH as Singh was continually misrepresenting ATLAS to get more funding, perpetrating a fraud without apparent concern. When Faghmous left in early fall 2017, ATLAS was still very much in infancy and essentially useless despite his best efforts to make it work. It did not yet have any useful functionality or output. That was not unusual, as big data projects often take years to build, but Faghmous did not want to be responsible for or legitimize vaporware Singh was selling as real.

2. Humale Khan

277. Humale Khan received his bachelor's degree in Computer Science from Cornell University, where he spent his summers interning at Microsoft, SpaceX and other tech companies. His first foray into global health was as a member and then project lead of Engineering World Health, a student-run organization of engineers who design and build medical devices for resource-

poor communities. After graduating from Cornell, Khan worked at Microsoft as a Program Manager for the Operating Systems Group. Khan helped design a feature for an innovative screen-reading tool called “Narrator,” which used artificial intelligence to read out and describe images for visually impaired users.

278. In 2017, Faghmous hired Khan to become a Product Manager at AIGH. He joined the Institute even though it meant a pay cut, \$95,000 compared to \$130,000 at Microsoft. Khan was willing to earn less because he believed in AIGH’s mission and wanted to make a difference in the world—something he thought he could do at AIGH.

279. Khan’s main role at the Institute was developing ATLAS, the tool that was intended to combine satellite imagery, machine learning and epidemiological methods to identify at-risk patients in rural communities and plan effective interventions. Khan was first tasked to oversee the development of a prototype that would coordinate the data available to ATLAS and display it in a user-friendly application upon which further programs could be built.

280. When Khan arrived, ATLAS had very little written computer code for it and its GitHub account, used to track and show progress of computer programs, was largely empty. Khan and his colleagues essentially had to build ATLAS’s code up from scratch, which was particularly distressing since ATLAS had to report to USAID on its progress in October 2017, just a month later. Without developed computer code, there was very little, if anything, that ATLAS could honestly report as an accomplishment.

281. Faghmous left AIGH within a month of Khan’s arrival, leaving ATLAS without direction or leadership. Khan started his work on the prototype but became aware that ATLAS’s data—mostly based on Zika data from Guatemala and some user insight reports—were grossly incomplete, meaning the prototype was bound to be ineffective.

i. Khan sees Singh making misrepresentations to donors

282. Khan soon became concerned about Singh's conduct for the same reasons that drove Faghmous to leave AIGH. Khan saw Singh give inconsistent and false presentations on ATLAS to donors, asserting it had features and uses that it simply did not. Singh regularly said that ATLAS was deployed in the field and was improving health care services, whereas it was still in its infancy and a long distance from being able to do anything. Like Faghmous, Kahn was not a fraudster and did not want to abet one.

ii. Fraudulent USAID report

283. Although Khan did not work for AIGH when it secured a \$300,000 grant from USAID to develop ATLAS, he was part of the team who reported to USAID on the grant's progress in 2017. Early in his employment, Khan was on a call with Geraldine Llames ("Llames"), Project Manager, and Jennifer Fluder ("Fluder"), AIGH's program manager and advisor at USAID. In that call, Fluder listed all the targets to which Singh had committed at the beginning of the grant, namely getting ATLAS to the point where it could develop and test machine learning algorithms, be tested in the field, and use rainfall/health data to predict the spread of the Zika virus, among others.

284. Khan was concerned. It was clear to him that Singh could not possibly deliver on any of those targets by the time AIGH had to submit ATLAS's final report to USAID. None of them had been achieved. Singh's flagship project was adrift and sinking. With only a few weeks before the due date, Khan recommended that AIGH own up to its lack of progress on ATLAS and explain the constraints that had impeded them.

285. Singh, true to form, would not let that happen. The ATLAS team, including Singh, Silva, Llames and Khan, traveled to Washington D.C. to meet with Fluder. During this meeting,

Fluder asked Singh directly: “How many users does ATLAS have?” Singh was flustered at first, because he knew ATLAS had none. Rather than admit this, he made up an answer and said something like “ATLAS is covering 20% of Guatemala” and “ATLAS has hundreds of users.” Fluder said that she did not see those numbers anywhere in the draft report and asked Singh to include that statistic in the final version.

286. After the meeting, Singh instructed the ATLAS team to revise the USAID report as she had asked. Khan was astonished to see how unabashedly Singh was willing to submit fabricated data to a government body.

287. Berman and Singh appeared highly determined, even enthusiastic, about falsifying the USAID report despite the efforts of Khan and his colleagues to explain how disastrous this could be to AIGH’s reputation. Emilie Bruzelius (“Bruzelius”), a colleague of Khan’s, even highlighted many portions of the report that used scientific terminology in fundamentally incorrect and almost laughable ways. But Silva, Berman and Singh, during a group discussion in the design room, disregarded these concerns and made fun of them. Berman told Khan and Bruzelius they worried too much. Singh laughed it off as well, adding that “these reports would be given out to people who would not understand the text or even read it anyway.” Berman then said that Singh had “particular expertise in presenting work like this to older white people at foundations” to get funding. Singh and Silva laughed in agreement with Berman and left the room.

288. Berman, Singh and Silva frequently questioned Bruzelius’ expertise, implying that her opinion did not matter because she was a woman who was too emotional.

289. Despite the efforts of Khan and his colleagues, the final and printed version of the report (the “Final USAID Report”) contained several false statements, most notably, on page 16, where it said that ATLAS had a “coverage of 16% of secondary health coverage services. Each

health district has a Nurse and a Health Supervisor, while each health area has an Epidemiologist, providing a total of 224 ATLAS core users.” This was false—ATLAS did not have any users, core or otherwise. The Final USAID Report was a fraud.

iii. Presentations to external donors

290. Also in fall 2017, Singh, Berman, Khan and their colleagues made presentations about ATLAS to representatives of the Gates Foundation and Vulcan Inc. As with USAID, Singh exaggerated ATLAS’s capabilities, stating that it was heavily tested with health care workers, which it was not, and that its machine-learning algorithms were being tested on the ground, which they were not.

291. The thinness of Singh’s lies became apparent when the representatives probed deeper. He was unable to answer their questions. When Singh decided to showcase the prototype that Khan had helped build in the first few months of his employment, it was clear that Singh did not know how it worked, clicking on parts of it and appearing surprised or confused at the result, as if he had just opened it for the first time.

292. Another AIGH staffer concerned about Singh’s honesty with donors was Amanda Misiti. In January 2018, in response to questions from Melinda Abrams, Vice-President of the Commonwealth Fund, about certain methods employed in AIGH’s Task Force on Global Advantage report, Singh sent Misiti a draft e-mail response and copied Safo. He asked Misiti to review and improve it. She thought it was riddled with misrepresentations and in her reply to Singh highlighted everything she thought he should change or redact.

293. In January 2019, Singh and Misiti’s team were preparing for a critical meeting with the Commonwealth Fund, and she sent him the draft slide deck and report to review. Two days later, Singh responded with his thoughts on how to address questions he anticipated the

Commonwealth Fund might ask. His suggested answers exaggerated AIGH's progress on the project. He wanted to tell the donors something different than what the stakeholders had agreed upon. Misiti felt very uncomfortable about Singh's planned approach and responded to him the same day, saying: "I think it is ill-advised for us to indicate that there is a greater degree of specificity committed to beyond what was written on and signed in the commitment document." She did not want to be involved in misleading the Fund's representatives.

3. Khan's whistleblowing and departure from AIGH

294. Khan left AIGH on February 4, 2019, but before he left, he felt it was his ethical duty to report Singh.

i. Report to the Mulago Foundation

295. On January 30, 2019, Khan wrote an e-mail to the Mulago Foundation through their website contact form to offer his anonymous feedback on projects at AIGH. Alex Hughes-Smith, Starr's Executive Assistant, responded, asking to schedule a call between Khan and Starr. During the call, after Khan elaborated on his report, Starr said that he cared about the success of AIGH as well as Singh's success, and said he would try to find a solution to this problem.

ii. Report to USAID

296. Khan also contacted Fluder via LinkedIn to report Singh to her directly. He learned that she had left USAID, but she connected him to David Milestone ("Milestone"), Acting Director for the Center for Innovation and Impact at USAID. Khan spoke to Milestone by phone on February 25, 2019. Milestone promised Khan anonymity and encouraged him to participate in an investigation into Singh's conduct.

297. On July 27, 2020, Khan contacted USAID for an update on the investigation; however, it was unable to comment. To date, Khan has yet to receive an update.

iii. Report to Mount Sinai

298. Khan did not know that Anandaraja, Atkinson, Rahona and others approached Mount Sinai to file a complaint against Singh in 2018. He was not informed of the existence of that complaint, the resulting investigation or any of its outcomes.

299. As he was leaving AIGH in early 2019, Khan was surprised that Jones-Winter did not schedule an exit interview, so he wrote her on February 1, 2019, asking for a meeting to air his concerns about the Institute and make his own complaint. They exchanged several e-mails, in which Khan made clear that:

- Singh's claim that ATLAS was being used by community health care workers or their managers was completely false. ATLAS was not deployed in the field by AIGH or any of its partners;
- the Final USAID Report contained false statements;
- Singh regularly oversold ATLAS to potential funders; and
- ATLAS's servers likely contained unprotected patient health information.

300. Khan and Jones-Winter spoke over the phone to discuss Khan's allegations in more detail. Khan also offered to send Jones-Winter evidence substantiating his complaint. Jones-Winter sounded interested, telling him that she had been looking into Singh for a long time but had little hard evidence.

301. Khan provided Jones-Winter with the evidence that he thought relevant, but never heard anything more from her about any investigation.

302. On February 12, 2019, Khan made a separate report directly to Charney, which he concluded by saying:

I'd be happy to get on a call with you to discuss other serious violations, but I hope this is good to start. I'd like to note that this has been reported to HR and the people

that coordinated my exit interview. My hope is that the large quantity of funds used for this project is instead used for projects that truly help vulnerable communities in a measurable way. What is clear is that the organization and staff have spent an extremely long time on this project, with no impact to date. Any potential impact is also clearly impossible from how the organization is structured and run under Dr. Prabhjot Singh's leadership to allow such an ineffective project to continue this long. Also, I'd like to note that I'm coming forward now because there are many who work at Arnhold who are afraid to come forward and share what they've experienced; I'd like my account to help change the culture at Arnhold to ensure that only work that has real impact is being done. I am also concerned for how liable Arnhold may make Sinai at large, given the various elements I've mentioned about the exaggerations and lies around Atlas, especially to federal funders.

303. Singh had obvious reasons of self-interest for not admitting problems in ATLAS or other programs to donors and his own managers, but his disregard for basic standards of honesty and his insistence that employees back him up was another way he intimidated them and made them nervous about whether they could ever stand on firm ground with him. In this way, his handling of ATLAS illustrates the management techniques he used to turn AIGH into a hostile environment.

iv. Other reports

304. Khan and Smaldino also reported Singh's conduct to Medic Mobile, a software company. Singh wanted to partner with it and had exaggerated AIGH's successes to accomplish this. Khan and Smaldino wanted Medic Mobile to know the true nature of AIGH's work—not just Singh's fraudulent account of it—so that they could make an informed decision about collaborating with AIGH. Khan also made a similar report to Ray Brunsting, the Chief Technology Officer of the Tula Foundation, which was one of AIGH's partner organizations for the USAID grant. Brunsting told Khan that the Foundation would likely slow down or freeze its cooperation with AIGH as a result.

4. Khan is retaliated against

305. After Khan left AIGH, on February 12, 2019, Weisman e-mailed him suggesting they have an “informal exit interview” to catch up. Khan agreed, and Weisman called him on February 15, 2019. Khan knew that Weisman and the rest of the team, likely including Singh, recently had a meeting with Starr, so Khan asked Weisman how it went. Weisman said it went well. Khan then told Weisman that he had reported Singh and ATLAS to Starr, suspecting that Starr had told Weisman in their meeting anyway.

306. After the call, Khan learned from several staff members at the Institute that Weisman had told them that he was concerned for Khan’s mental health, calling him “manic.”

307. Khan also learned that Singh made several similar comments, including to the Oversight Committee created in response to the HR complaint about Singh. Singh told Jones-Winter, “It’s not my medical focus, but he seemed manic.”

K. SINGH DISCRIMINATES AGAINST CALIENDO

308. Singh continued to mistreat women after he drove Anandaraja, Atkinson and others out of AIGH. He continued undermining, berating and silencing them. The only way a woman could avoid this was through total subservience. Like Atkinson, Anandaraja and Rahona before them, however, Caliendo would not abase herself and Singh sought systematically to make her life miserable.

1. Caliendo’s background

309. Caliendo started at Mount Sinai in November 2015, first working in the President’s Office for the Senior Vice President of Cardiology. In January 2017, Singh hired her to be his Executive Assistant. Caliendo gladly took the job. She was inspired by AIGH’s mission.

310. Prior to joining Mount Sinai, Caliendo had spent her entire working life as a successful Executive Assistant at large firms, including *The Economist*, Credit Suisse, Avon Products and the Memorial Sloan Kettering Cancer Center. Caliendo has also worked and volunteered at charities that focus on women.

2. Singh accuses Caliendo of “talking too much”

311. Caliendo found Singh unpredictable and mentally erratic. He often changed his hours and left the office without telling anyone. He regularly canceled meetings and ignored e-mails, especially from women. He seemed to only care about pleasing and impressing his boss, Charney, however much he disparaged Charney behind his back.

312. In spring 2017, at the end of Caliendo’s standard probation period, Singh met with her to conduct a formal review of her role. He was at first professional and kind. He said he was happy with the way Caliendo ran the office and had only one piece of feedback—he wanted her to print out Google Maps directions for him whenever he had a meeting outside Mount Sinai. Caliendo happily agreed to do that.

313. Then Singh’s attitude changed for no obvious reason, and he became hostile. He accused Caliendo of “talking too much.” He forbade her from talking to anyone else at the Institute while at work. Caliendo was taken aback by the order; much of any Executive Assistant’s job is to be friendly and develop working relationships with people around her. It would be impossible to do her job without talking to colleagues. She left the meeting belittled and demoralized. To please Singh, she kept her interactions with her colleagues to a minimum, and usually only via e-mail. One of her colleagues noticed how withdrawn and unhappy she was; she told Caliendo that she seemed like someone had “turned off the light” in her.

314. This was in stark contrast to how Singh treated Caliendo's male predecessor Executive Assistant, Andrew Randall.

315. Over time matters became worse. Singh was hostile and disrespectful and would yell at her. He would also disparage important people in his professional world such as Charney and Sachs in front of her, which made her uncomfortable. She began to dread going to work, her heart would pound and her stomach hurt. She came to feel emotionally drained and battered.

L. BERMAN, SINGH'S CHIEF OF STAFF, YELLS AT WOMEN

316. Singh hired Berman to serve as AIGH Chief of Staff in 2016. Berman obtained his master's degree in Sociology from Columbia University in 2002 and his bachelor's degree in Business Administration-Finance from California Polytechnic State University – San Luis Obispo in 1998.

317. Before joining Mount Sinai, Berman had been a consultant for six years. Before that, he worked in many different positions: a Managing Associate for Next Street Financial for one year, Special Assistant to the President at the Children's Health Fund for four years, Associate Director for the Center for Catastrophe Preparedness and Response at New York University for two years, a Senior Policy Analyst for Children's Health Fund for two years, a Senior Policy Analyst at Columbia's National Center for Disaster Preparedness for two years and in financial roles for several other employers for no more than a year each.

318. Singh gave Berman a free rein to manage AIGH as he saw fit. Berman's handling of staff quickly fit right into the culture created by Charney and Singh where women were second class citizens. Berman, following Singh's lead, was a terrifying boss, prone to sudden eruptions of anger. It was not uncommon to walk the halls of the Institute and hear Berman shout at female employees at the top of his lungs.

319. Singh, Berman's supervisor, saw and heard Berman's outbursts. He was often present or nearby when Berman shouted at women. Singh never intervened, giving a green light to continued bullying.

1. Berman yells at Bischoff

320. Early in his employment, Berman snapped and yelled at Renee Bischoff, who was Anandaraja's right hand at AIGH. Bischoff had been at Mount Sinai since 2009, knew a lot of people across various departments and was widely liked and respected. Berman was jealous of her excellent connections. As the AIGH Chief of Staff, he wanted forming partnerships with other departments at Mount Sinai to be exclusively his role.

321. Bischoff was AIGH's lead on one of its global health sites in Kenya, having worked with the team on the ground there for many years. Berman tried to push her out so he get could that role himself. Once, just as Bischoff returned from a trip to Kenya, Berman sat her down in an office and starting yelling at her about the trip and for daring to hold further internal meetings about the Kenyan site after she returned. Berman yelled at Bischoff for over five minutes, his voice and language escalating higher and higher, bellowing through the Institute. Caliendo shook in her chair.

322. Many colleagues witnessed Berman shouting at Bischoff. Berman was gesticulating so wildly and threateningly at Bischoff that Caliendo worried about Bischoff's well-being. Another colleague, Baum, went into the meeting room to defuse Berman. This had the desired effect. Berman apologized to Bischoff a few days later, though not to others in the office who heard his outburst -- but in the same breath added that she had probably told everybody in the office about it anyway, so he did not sound very apologetic. She gathered his true concern was that his screaming might get him in trouble with HR, not that he had done anything wrong.

2. Berman yells at Caliendo, making her fear he will hit her

323. Although Caliendo was Singh's Executive Assistant, Berman started to manage her too. He instructed her to start providing him with detailed workplans and wanted every minute of her time to be accounted for. While this is standard for lawyers, it certainly is not for executive assistants, and Caliendo had never encountered it. It felt like she was being tested and intimidated. She did not see Singh or Berman similarly monitor anybody else.

324. In July 2017, Singh and Berman travelled to Aspen. Berman asked Caliendo to make a minute-by-minute itinerary for him and Singh, which she prepared. Berman then kept on requesting changes to the itinerary, often long after working hours with intrusive and repetitive text message reminders, requiring Caliendo to work around the clock. Berman tasked Caliendo to work with AIGH's Communications Director to finalize and send out the Institute's Annual Report while they were gone. Unfortunately, the Communications Director had a serious medical emergency and was out of the office, so the project came to a halt; Caliendo could not finalize it without her.

325. When he returned from Aspen, Berman ran up to Caliendo's office and started screaming at her about the delay at the top of his lungs. He fully erupted: his face was bright red, he was fuming, spitting and clenching his fists. Caliendo's body froze. She was scared but did not know what to do. Berman was so out of control and yelling at her so violently that she feared he would hit her. She started crying profusely.

326. Singh was in a meeting room adjacent to his office with Misiti and an intern, Pranay Nadella. A few minutes into Berman's tirade, Singh left his meeting, walked into Caliendo's office, and then walked by her desk into his own office and shut the door, all the while allowing Berman to continue abusing Caliendo. Moments later, he walked back to continue his meeting

with Misiti and Nadella, as if nothing unusual was happening. Misiti did not ask him to intervene, she was scared and confused at the time. Berman's loud voice continued booming through AIGH, but Singh ignored it.

327. Once Berman finally left Caliendo's office, leaving her shell-shocked and in tears, Singh left Misiti's meeting again and went to talk to Berman. Misiti, recognizing that Caliendo was likely in need of some support, went to tend to her. She found Caliendo bawling and still shaking from Berman's torrent of abuse.

328. A few moments later, seeing Misiti talking to Caliendo, Singh stopped talking to Berman and walked in too. Not only had he allowed Berman's abuse to happen by not intervening, he did not join Misiti in trying to console her but instead began criticizing Caliendo. He told her that Berman was right and that Caliendo should "slow down" so she would not make "so many mistakes." Misiti was shocked that Singh chose to side with Berman. She had not caused the problem with the annual report. Caliendo wiped her tears and told Singh that she needed to go home and be alone.

329. On another occasion, Caliendo took bereavement leave from her work at AIGH to attend a funeral of a family friend. During the church service, Berman called her and demanded that she attend to a research paper one of the doctors was submitting for publication. Between the beratement she has suffered from Berman already and the devastating circumstances of the funeral, Caliendo was in no emotional state to do this but felt she had no choice but to comply with Berman's demand. She left the church service to do the work on her AIGH-issued cellphone. After half an hour, Caliendo realized that the doctor never actually sent the paper or the accompanying paperwork necessary for publication, meaning Berman never had a reason to

interrupt her at the funeral service. The whole incident was unnecessary and thus doubly distressing.

3. Singh and Berman try to change the narrative and fire Caliendo

330. Later that day, Berman approached Misiti and asked whether she had heard his “interaction” with Caliendo. She told him that she had. He then asked her whether it sounded like he raised his voice. Misiti said that it sounded like he had been yelling.

331. Following the incident, both Singh and Berman separately asked Misiti if she had any issues working with Caliendo. Misiti made it clear to both that she had absolutely no issues with Caliendo and thought her a good employee. Misiti suspected that they were trying to build up a sham case to fire Caliendo even though she did nothing wrong—she was the victim here.

332. For the following week, Caliendo continued recovering from Berman’s attack. She cried every day before going to work and found it difficult to hold herself together once she arrived. She was overwhelmed by anxiety, afraid to be anywhere near Berman. She felt hurt by Singh too, who had done nothing to restrain Berman.

333. Misiti was right to worry about Caliendo’s job security. Singh extended Caliendo’s probation and, in August 2017, told her that things “were not working” and fired her. When Caliendo said that she was worried about losing her job and her health insurance, Singh told her not to worry; she could always rely on Medicaid. He had never warned her that her job might be in jeopardy.

334. Singh’s firing of Caliendo came the day before a summer retreat that she had planned for AIGH staff. Singh did not inform others that he had fired Caliendo, creating an uncomfortable confusion when she was absent.

M. SILVA'S SEXIST AND RACIST REMARKS ABOUT WOMEN AT AIGH

335. Bruno Silva joined AIGH in January 2016 as the Director of Design and Product Development.

336. Prior to joining Mount Sinai, he worked as the Lead Experience and Product Designer for Amplify Education. He has also worked as a designer for B&B Productions, Radical Media and Trollbäck & Company. His design work has been displayed at the Museum of Modern Art and the Cooper Hewitt Museum, and he spoke at the Healthcare Refactored 2017 conference and the Mayo Clinic Transform Conference 2016.

337. Silva received his MFA in Design for Social Innovation in 2016 and his BFA in Graphic Design and Advertising in 2007 from the School of Visual Arts. He obtained his Bachelor of Applied Science in Medicine in 2001 from the Universidade do Grande Rio in Rio de Janeiro. This year, he began studying for his Ph.D. in Inclusive Design and Creative Technologies at University College Dublin.

338. Silva quickly built a reputation for making inappropriate, sexist and sexual comments about women at AIGH. For about a year, Khan sat in the "design room" together with Silva and the rest of his design team, witnessing Silva's daily verbal attacks. Silva demeaned women constantly, commenting on their physical appearance, sexual activity, use or non-use of makeup, and general attitude.

339. If a woman said something in opposition to Silva or even displayed slight skepticism with his ideas, his immediate reaction was to ignore her for the rest of the meeting, and ridicule her behind her back. Women to Silva were, to use his word, "cunts."

340. Silva particularly enjoyed commenting on women “being wet.” Once, Silva even licked his fingers and touched his crotch area in reference to “getting wet” in a conversation that included Llames.

341. Llames was frequent witness to and target of this abuse. Her office (shared with a colleague) was next door to Silva’s. They were interconnected by an interior door, but each also had an individual entrance from the hallway. Silva often walked through Llames’ office to get into his, as if it were part of his territory. As he barged through multiple times a day, he often began long conversations, lamenting various aspects of his personal life. If he felt Llames was not listening to him intently, he would get upset. He seemed to expect her to entertain him at all times, no matter how busy she was.

1. Silva’s comments to and about Llames

342. On multiple occasions, Silva made intrusive and derogatory comments about Llames’ appearance, saying, for example, “you look rough today.” Once, he took an unflattering photo of Llames and posted it on Instagram, ridiculing her. He often said that Llames should wear makeup to look better. Another time, he said, “You look slutty today, what are you doing after work? Do you have a date tonight or something?” He often suggested that when Llames looked pretty (in his opinion), she was going to have sex that day. Silva made lewd comments about Llames’ genitals and alluded to her having her period, such as “Why is Geraldine so upset? She’s probably on her period.” Silva told Llames, who is Filipina, presuming she also had a Filipino boyfriend or partner: “Asian men have small dicks.”

343. Silva also commented on Llames’ weight. When Llames bought snacks and Silva noticed, he criticized her weight and body, making comments such as, “What’s your mother gonna say if you eat this?,” “Girl, you are putting on some weight,” “You better watch out, you don’t

want to gain any more weight,” “You shouldn’t be eating that” and “You’re eating quite a lot today, are you sure you want to do that?”

344. Silva further called Llames a “lazy bitch” and “crazy” to her colleagues.

345. Once, Silva and Llames went to Washington, D.C., and Llames said she might ride her motorcycle from her family’s home in Virginia if the weather was nice. Silva seemed surprised that Llames had a motorcycle, so Llames showed him a picture of herself on her motorcycle. Silva quickly said, condescendingly, “You look like a dyke.” Llames told him that he could not say that; it was inappropriate. Silva said he was just kidding but did not apologize.

346. Singh treated Llames noticeably worse than Silva. Silva could work whenever and wherever he wanted; Singh kept Llames on a tight leash. Silva often teased her, “We’re leaving early, but you can’t!” while pointing at Singh’s office. He took pleasure in her hostile work environment and delighted in pointing out how much better Singh treated him than her.

347. Silva’s waterfall of derogatory comments made Llames uncomfortable and self-conscious about her appearance. She tried to write them off as juvenile, but sometimes Silva got to her. Singh never did anything to stop him.

2. Silva’s comments targeting Khan and other AIGH staff

348. Silva once told Llames: “Alyssa [Smaldino] is being a bitch. Maybe she’s on her period.” He also frequently called Caliendo “crazy.”

349. Another time, Silva said to Llames, “I said hi to Shanice, but she probably didn’t hear me because her hair is too big.” Shanice Guerrier (“Guerrier”), Process Engineer, is a black woman, and she often changed her hairstyle, sometimes leaving it natural. Silva made similar comments about Safo. He also commented on Misiti’s hair, saying “she looks messy,” and once told her that one of her skirts made her “look like a Hasidic Jewish woman.”

350. Silva called Dr. Natalie Privett, Assistant Professor of Health System Design and Global Health, who was pregnant at the time, lazy—he said she was using her baby as an excuse not to work. He also said he did not think she would come back from maternity leave.

351. Although Silva’s abuse mostly targeted women, he also went after Khan, who is Pakistani and a Muslim. Silva criticized Khan for not drinking and for going to pray. When Khan was out of his office for religious reasons, Silva would say, “Humale said he’s out praying, but he’s probably out interviewing,” and roll his eyes. He also frequently said that Khan smelled bad, saying “it smells like shit in here,” or “it smells like curry” in Khan’s office. These comments made Khan deeply self-conscious. He became anxious about smelling bad and started buying and applying multiple deodorants and chewing gum excessively.

352. Silva also made derogatory comments about Eid, a Muslim tradition that involves adherents visiting a slaughterhouse to select and humanely slaughter a goat. When Silva found out that Khan participated in this tradition, he made numerous comments calling him and his family “backwards” and “weird.” On Khan’s return from the Eid holiday, Silva repeatedly asked him, in the design room at AIGH, “how was the goat?”

353. Silva routinely asked Khan’s colleagues for their opinion about brutally slaughtering a goat, and how gruesome it would be to witness, hoping to elicit more responses about the “backwards” nature of the ritual in front of Khan. This created an environment where Khan felt isolated and alienated for his beliefs, fearing that conversations with colleagues would end up in more such bullying. This made him isolated from many of his colleagues and anxious.

3. Silva even targets visitors to AIGH

354. Silva also made comments about employees of various Mount Sinai departments and external organizations that partnered with AIGH. For example, after a woman from another

Mount Sinai department came in for a meeting, Silva told the rest of the AIGH team, including Khan, “if I wasn’t gay, I’d have sex with her.” After one of AIGH’s meetings with Dimagi, a partner organization, Silva said about one of the women attending: “She’s so dirty... she smells... no man would want her,” “she looks like she hasn’t gotten laid.” He further called her a “dumb, crazy bitch,” and said that she “smells, needs to learn how to wear deodorant,” and “girl needs to wear makeup.”

355. Singh and Berman knew about Silva’s statements and heard them directly, but never interfered. Singh set the tone for AIGH by abusing women himself, and letting Berman do the same; this created an environment where Silva felt he could get away with a torrent of abusive comments. Safo frequently told Singh that Silva made acid remarks about people behind their backs and fueled a culture of nasty gossiping, but Singh did not chastise Silva. Instead, Singh protected him and told Safo not to antagonize him.

4. Khan reports Silva to Singh, to no avail

356. In or around October 2017, Khan decided to report Silva and his abusive comments to Singh. Singh thanked Khan for his complaint, told him he would keep his involvement confidential, and work towards finding a solution.

357. In November 2017, after ATLAS’s meeting with USAID in Washington D.C., which both Khan and Silva attended, Silva came up to Khan in the airport on their way back to New York. Silva told Khan in a threatening tone that he (Silva) and Singh were very close and talked about everything openly. Silva emphasized that he and Singh did not keep secrets. Silva then said that this gave him the ability to protect Khan or get him fired.

358. Silva said that he had been protecting Khan so far and that he would continue to do so for as long as the whole team worked together and told each other everything. He told Khan

that he would not want there to be any problems in the team, because then both Silva and Singh would have to tackle them. Silva's demeanor made it clear that Singh had told him that Khan had complained about Silva.

359. Khan was not frightened or deterred. In a later meeting with Singh, Khan said that Silva's behavior had not improved at all, and that if anything Silva was treating Khan worse than before, both personally and professionally. Silva was delaying his contributions to Khan's projects so as to derail them. He would routinely agree and meet deadlines on projects with other staff but would either not deliver designs on time or design something completely unrelated and unnecessary, only to then yell at Khan for apparently not knowing anything about design. Silva would then speak badly about Khan's skills to other designers at AIGH, who, believing Silva's lies, did not treat Khan's projects seriously. To further derail Khan's projects, Silva made anti-Muslim and Pakistani comments about Khan to demotivate him.

360. Singh listened to Khan and then told him, "I'm here to help you figure out how to work with him. We all know how he is. Let's try to find a solution on how to work with him." But Khan told him that even when he tried to avoid working with Silva, Silva would insert himself to sabotage Khan's projects.

N. HUMAN RESOURCES COMPLAINT AGAINST SINGH

361. Although Safo was one of Singh's hires, and so not a natural ally of Atkinson, Anandaraja, and Rahona, after Safo's resignation from AIGH on February 28, 2018, the four reconnected and began to discuss their shared experiences of mistreatment by Singh. They decided to jointly file a complaint against him at Mount Sinai.

362. On April 27, 2018, Anandaraja and Atkinson met with Jones-Winter to ask her about the procedures for filing a complaint. They were worried that Singh would retaliate against

any complainant still at Mount Sinai. Jones-Winter assured them that they could submit an anonymous complaint, which would be investigated by Mount Sinai's Human Resources and Legal offices. Anandaraja and Atkinson submitted a verbal complaint.

363. Jones-Winter told Atkinson and Anandaraja that she had been hearing about problems with Singh for some time, knew that AIGH was suffering unusual staff turnover and that their complaints corroborated what she had heard from other employees about Singh. Nevertheless, Jones-Winter said that the final outcome of any investigation would depend on what Mount Sinai stood to gain or lose as an institution, and Charney would be the one to decide. Jones-Winter also told them that the *New York Times* would love their story, which they agreed to consider if Sinai did not respond appropriately.

364. Four days later, Jones-Winter called Atkinson to give her an update. She told Atkinson that the problematic situation with Singh "started at the top," meaning with Charney. "We spoke to Legal about it too, how Prabhjot got in the door in the first place, and how his structure has been maintained, his lack of output, and the amount of turnover at the Institute," Jones-Winter said. She went on to say that "When Caryn [Tiger-Paillex, Associate Dean for Staff and Faculty Relations] was in seeing Charney yesterday, Charney admitted to her that he picked Prabhjot, and it was casually done. He thought [Prabhjot] was a rising star." According to Jones-Winter, Tiger-Paillex viewed Charney's chagrin over the bad fallout caused by Singh as a basis to persuade him to pay more heed to normal hiring procedures. Tiger-Paillex told him—gently—that the bad results from Charney's picking Singh without due diligence proved that "process is an issue" to which Charney needed to pay more attention. Jones-Winter said to Atkinson that "we have a good team looking at this, but we have to be careful not to threaten Charney, we've got to approach it gently, as, see—this is what can go wrong when process isn't followed."

365. Charney might have been less protective about Singh if he had heard how Singh routinely described Charney to colleagues at AIGH: as “dumb” and “stupid.” Singh described himself as “almost always the smartest person in the room,” which accounted for his success. He also said that he could get things over on Charney and Davis, because he was so much smarter than they were.

1. Mount Sinai’s investigation of Singh

366. Mount Sinai then undertook an investigation of Singh and AIGH, led by Jones-Winter, Senior Associate General Counsel Marina Lowy (“Lowy”), and Tiger-Paillex. In May 2018, the investigative committee conducted interviews with at least 13 current and former employees of AIGH.

367. Those who gave evidence included all the plaintiffs in this lawsuit except Khan who was not informed of its existence, plus Safo, Bruzelius, Llames, Misiti, Smaldino, Faghmous, Bischoff, Beddoe, Rahona, and many others. They each described their issues with Singh, Berman, Knaup, and Silva. Some supplied written statements first, but they were all intensely interviewed by the committee.

368. Beddoe was interviewed by Lowy for 20-30 minutes. She described her concerns about Singh and the incompetencies she saw from day one, and emphasized the complainants deserved to be taken seriously. She said she had been hearing their accounts of Singh’s misconduct since his arrival at AIGH.

369. Rather than replying neutrally to these comments, as Beddoe would have expected of an independent investigator, Lowy explained to Beddoe that when she was a young lawyer in Israel, she herself had experienced treatment similar to what the complainants were bringing forward and did not understand why they were doing it; the clear implication was that they should

simply tolerate it. That the “independent” investigator made this comment troubled and offended Beddoe.

370. Lowy contended that some of the allegations were not true on the basis that when they were put to Singh, he denied them. She concluded by saying that Beddoe and the complainants “may not be happy” with the outcome of the investigation. Beddoe was confused as to how Lowy could know the outcome when they were still investigating, and inferred either that Lowy had prejudged the outcome or that someone more senior (specifically, Charney) had already decreed it. Beddoe was so concerned by Lowy’s comments that she decided to speak to Charney directly.

371. Beddoe pitched the meeting to discuss her global oncology program, but opened it by explaining to Charney that she had done this rather than flag up she wanted to talk about Singh because of Charney’s widely known volcanic temper. She explained that she was coming from a good place and wanted to discuss her deep concerns about the internal investigation.

372. Charney appeared stunned and told Beddoe that he did not understand why anyone would claim that he had a bad temper. Beddoe then frankly relayed her concerns about the investigation. She said that Singh had consistently demonstrated he was not fit to run the Institute, just as she had predicted when she interviewed him, that he was in over his head, that he had mistreated multiple women at the Institute, and that she was worried that the investigation would not hold him properly to account.

373. Beddoe explained that Singh had verbally and emotionally abused his female colleagues, that the methods by which he did so were often subtle rather than overt, and that he purposely walked the line between the two. She said that Charney, as a psychiatrist, would

recognize this kind of pathology. She also said that if the investigation cleared him of any misconduct, she worried he would feel emboldened and become overtly abusive.

374. Charney replied that he knew of no concerns about Singh's conduct until they were raised by Atkinson, Anandaraja, Rahona and Safo, which had prompted him to order the internal investigation. Charney claimed that he was a champion for women and women's rights, that he himself had daughters, and that he had supported the women who complained about Singh.

375. Charney asked Beddoe if she believed that Singh could be rehabilitated. She said she did not think so. Charney said he believed that Singh "had potential" and should be given a chance to develop it. Beddoe strongly disagreed, and asked "what about the potential of the women Singh mistreated?" Charney had no response. Charney ended by stating that he would follow whatever recommendations resulted from the internal investigation (an investigation that Lowy had just hinted that Charney had predetermined).

376. The following week, Beddoe heard rumors that the investigation was done and that Charney would reveal the outcome (in favor of Singh) within days. Still concerned, Beddoe wrote Charney on June 23, 2018:

Dear Dean Charney,

I want to once again thank you, now personally, for meeting with me last week. I was encouraged by our conversation and left with the profound feeling that Mount Sinai would go down in history as an academic institution that would show "zero tolerance" for emotional abuse and harassment of women by men in leadership positions at our medical center.

Sadly there have been numerous rumors heralding your announcement this week that range from appointing an oversight committee that would monitor the person alleged to have committed these offenses, while leaving his position intact to removing him from his current leadership role but protecting his career within the confines of our great institution. None of the rumors however hinted of his complete removal from the institution with assurances that Sinai would never condone even the perception of abuse to women.

This has consumed my thoughts and has given me sleepless nights: that you may be even entertaining putting one man's career over multiple women who have been mentally and emotionally scarred. I believed you when as we discussed you said that you did not know this was taking place at our institution. But now you do know and you will be judged by this very important decision. It will be the true test of Mount Sinai's values in the field of diversity and tolerance of bullying.

I have conveyed to some of the women the sentiment that you expressed in full support and value of women; but any action by our leadership that serves to protect men in power would undermine those sentiments and would send a profound message not just to these women but to all women on campus that Sinai does not have the "backs" of women but that the careers of men in power are of utmost importance to the institution and that their careers must be protected.

From deep in my heart I pray that you make the right decision. This is our institution's "Rubicon."

Respectfully,

Ann Marie Beddow

377. Charney never replied to Beddow's e-mail.

378. Earlier that month, at a meeting among Jones-Winter, Anandaraja, Rahona and Atkinson, Jones-Winter said that donors and other financial and political considerations would influence Mount Sinai's deliberations. She described another Mount Sinai HR investigation involving Dr. David Newman, a Mount Sinai doctor who ejaculated on one of his patients in the emergency room and was sentenced to two years in prison because of it. (Mount Sinai is still refusing to compensate the victim.) She said that Charney had wondered whether the narrative about that case could be spun to revolve around a drug problem of Dr. Newman, demonstrating that investigations often had a political context.

379. She also told them that Singh had engaged a labor attorney to fight the complaint. Jones-Winter stated that, at a meeting with Singh and his attorney, Singh had played a "trump card," which she did not describe except to say that it concerned Charney. Ultimately, against

Charney's preference, this "trump card" prevented Charney from firing Singh before his contract expired.

380. Further, at a birthday celebration for Safo in June 2018, Jones-Winter told Caliendo and others that Singh had successfully gotten away with "harming over twenty women" by "hiding behind his ethnicity and religion."

381. None of the complainants received a written statement of the investigation's findings. Singh remains employed by Mount Sinai even though much of his department complained against him. Berman, Silva and Knaup have now left the Institute, but under unclear circumstances, and Berman told Misiti that he had in fact left on his own accord.

2. Follow-up meeting on July 17, 2018 with HR and counsel

382. The only insight into the results of the HR investigation into Singh came for some of the complainants on July 17, 2018, when Anandaraja, Atkinson, and Rahona met Lowy and Jones-Winter. Lowy made many significant admissions of error by Mount Sinai in its handling of Singh at this meeting. They are reproduced here at length because they demonstrate that Mount Sinai's leadership recognized multiple institutional failures in the way Singh treated subordinates and was supervised by Charney and others.

383. At the meeting, Lowy told them that she and the rest of the investigative committee had made recommendations to Charney, which he had accepted in full and had also added to. This contrasted with what another senior person at Mount Sinai told Anandaraja, namely that Charney had not accepted HR and Counsel's original recommendation, and had intervened to change it.

384. Lowy then said that Charney had requested Singh to address all of the issues in the complaint, and established an Oversight Committee to monitor him. Lowy claimed that the investigation did not find gender or age discrimination in his conduct.

385. Nevertheless, throughout the 50-minute meeting, Lowy admitted that various leaders across Mount Sinai had not understood their role in reporting problematic behavior to their superiors. She admitted that senior staff to whom plaintiffs had spoken and/or knew of Singh's behavior did not take action. She said:

One thing that's been an interesting learning experience, is I think, people here grouse here all the time about Sinai, about the pay, about, you know, treatment, about environment that whatever and they talk to people and people don't always know that they're being talked to not as friends or colleagues or department colleagues or whatever. They're not understanding that this might actually be a formal complaint being brought forward that needs to be forward fed and, you know, that's something that people are gonna have to sort of understand. They can't just be a sounding board to people, but they have to try to do something about stuff that's reported up.

386. Lowy admitted that Singh's behavior had prompted people to feel Sinai had a culture of gender bias, and also that differences in compensation between men and women raised issues. Lowy said:

We are not arguing with people's perceptions of behavior, his demeanor, you know, clearly there's something about his demeanor that rubs people the wrong way and that makes people feel that there's a gender bias issue going on and that has to be addressed... And we're gonna have part of the oversight committee's job ... be to address this and to deal with it. Another aspect of this was compensation issues...

387. Lowy admitted that the complainants had accurately described Singh's harsh and hostile way of speaking to subordinates. She said:

[T]he things that you guys described, very articulately and very, very, you know, you weren't outliers in your descriptions of the way he spoke to people.

388. Lowy also admitted that Singh created the perception that he was biased against women, which was something he was tasked with fixing under Charney's supervision. She said:

You have to fix every aspect of all the issues that had been raised. And there were a lot of issues that were raised, including, ah, including the perception of bias. Um, and we have to figure out how to, how to take care of that one concrete thing.

389. Lowy admitted that Singh and his new management team of mostly men “painted outside the lines” customary at academic institutions and operated as if AIGH were a startup company without established policies. Lowy said:

You know, the reality is they’re not a startup, they’re an Institute in an established academic medical center and they have to work within those limitations. They have to apply the HR policies uniformly across the board. We have policies on everything and they just have to apply them and follow them. You don’t get to pick and choose and you don’t get to pick and choose fancy titles. You have to go with the titles that we have. And, you know, recruiting has to follow the rules of recruit...- not that they didn’t follow the rule. And actually the recruiting there seems to be phenomenal. They’re like incredible people who are recruited. Um, it’s just retention, is an issue.

390. Lowy continued:

None of this is on you. None of this falls on you.... I think it is a problem that people didn’t know how to trigger the appropriate review process. I think it’s a problem that we talked to people who had no idea who Caryn and Clarissa were. They had no idea there was an HR function. They thought Kirsten was the only HR person and she’s hardly an HR person. Um, and she didn’t, she wasn’t, I mean, not to get into that. I mean, she was not an HR person. Let’s just say that -- I mean, we have such robust complaint mechanisms and the fact that we were not able to communicate that down to all the way is, that is a failure. That’s certainly an issue. And at some point, you know, we’re not the little Mount Sinai that we used to be. We’re the largest employer in the city other than the city itself. And we have to figure out how do we communicate to 40,000 people. “This is how you trigger a complaint in a review.” Because I do think that to some extent, going to certain people was perceived as, you know, blowing off steam, as venting as, I don’t know-- “let’s figure out what to do about this together.”

And again, it’s unfortunate ... because it took so long to come forward, and again, this is not on you... but Mount Sinai, that people didn’t know or didn’t feel comfortable going to the right place to trigger an investigation.

391. Lowy also agreed that Singh was “lucky” to have retained his job after the investigation. This admission implies that he should have been fired or came very close to it. Atkinson pointed out that while the complainants had had to leave Mount Sinai because he drove them out, Singh was given the benefit of the doubt by getting special attention from Charney and an oversight committee. Lowy said: “He’s very lucky, for sure.” His victims got no such luck.

392. Lowy tacitly admitted Mount Sinai had permitted Singh to wield too much power over people, including Plaintiffs herein. She said:

People complained a lot about the power he wielded and the control he had and I think that's, that's finished. If he becomes amazing and he recoups it at some point, that'll be great for the institution if that happens, but it's not looking like it's gonna happen, certainly not while this oversight committee and the Dean are on him and, and the Arnholds are watching and the Board of Trustees is looking.

393. Lowy admitted that Singh became AIGH Director because he had "potential" as a gifted young man, but also that the "potential" of the women he forced out was not part of Mount Sinai's calculations:

Lowy: One thing that was sort of universal, people thought Prabhjot was very smart, he's very connected, had a lot of potential, it's up to him, whether he can, you know, reach that potential.

Atkinson: *We had a lot of potential too.*

Lowy: Yep I mean, I, I, I'm not, there's not, I, there's nothing I can say to, to make that better or to change what happened. I mean, I can't, we can't undo those events. And I'm sorry for that.

394. At the end of the meeting, Lowy and Jones-Winter asked Anandaraja to stay for a follow-up conversation. After Atkinson and Rahona left, Lowy and Jones-Winter told Anandaraja that they were concerned about her comments about a "from the top" culture of bullying at Mount Sinai and asked her to clarify her statements. Anandaraja asked them, "Have you never been screamed at by Dennis Charney?" Jones-Winter replied that she and Lowy were likely protected from that kind of behavior due to their position as in-house counsel.

395. Anandaraja pressed further and asked: "Are you telling me that you have never heard Dennis Charney screaming at other people?" Lowy agreed that Charney tended to shout at people but insisted that he was usually very pleasant afterwards and they felt that even though his reaction was to yell that did not mean that he was not listening to what he was being told.

3. Follow-up conversations with Mount Sinai about the investigation and Charney's oversight of Singh

396. On December 11, 2018, Anandaraja, along with Atkinson and Rahona, sent an e-mail entitled "Meeting Request" to Jones-Winter, Lowy and Tiger-Paillex. It said:

Dear Clarissa, We are writing to request an update regarding the HR investigation in which we participated early this year. We understand from our last meeting that a process of further investigation and monitoring were put in place, and we would appreciate the opportunity to meet and discuss progress to date. Thank you, Anu.

397. The e-mail was ignored. Atkinson followed-up with a second e-mail on January 9, which was again ignored beyond a cursory explanation that the Oversight Committee had "started its work." On January 10, Atkinson wrote to point out that Jones-Winter's e-mail sidestepped the meeting request, to which Jones-Winter replied she would speak to Anandaraja on her return from abroad to "eliminate the uncertainties of email communication."

398. Anandaraja and Jones-Winter did meet. Anandaraja said that the complainants against Singh would like to receive an update on the results of the investigation and the Oversight Committee's work. Jones-Winter advised that Anandaraja, Atkinson and Rahona should feel free to provide an update to their colleagues themselves, or to refer their colleagues back to the HR department. This was nonsensical since the HR department was not providing any information to the complainants or anyone else.

399. Finally, Jones-Winter said no written report on the investigation or the activities of the Oversight Committee would be made available.

4. Charney is anxious about Anandaraja's return to Mount Sinai

400. As Anandaraja was about to return to Mount Sinai in 2018 (see ¶ 266), Ripp, who negotiated her contract on behalf of Mount Sinai, told her several times that Charney was anxious and confused as to why Anandaraja would consider returning to work in an office that reports

directly to him. Charney was concerned that she would not be able to be “happy” in the Dean’s office given that he had not disciplined Singh in response to the complaints. Although Lowy and Winter-Jones had promised Anandaraja confidentiality during the investigation, it was obvious that it had not been honored, and that Charney was well aware of her involvement.

401. Anandaraja replied that if Charney was asking whether she was willing and able to do a good job as the Director of the Office of Wellbeing and Resilience, then the answer was “yes.”

402. After Anandaraja rejoined Mount Sinai, Ripp mentioned that her name came up several times during his bi-weekly meetings with Charney. According to Ripp, Charney consistently expressed curiosity about what and how Anandaraja was doing and offered to meet with her. Eventually, Anandaraja felt she could not avoid talking to Charney, as he was her superior, and made an appointment to see him on December 13, 2018.

403. At the meeting, Anandaraja told Charney that while they clearly had not seen eye-to-eye on how to handle the complaints about Singh’s behavior as Director of AIGH, they both shared the goal of seeing Mount Sinai improve and thrive, and she wanted to focus on that in her new role.

404. Charney appeared uncomfortable and agitated in the meeting, saying he had recently received an e-mail from a female employee who had implied that his handling of the complaint against Singh was the “crossroads” of his career, presumably a reference to Beddoe’s June 23 e-mail. Charney became irritated and said: “It makes me very angry when people suggest that I am not a champion of women” before elaborating on how many female leaders had been appointed since he joined Mount Sinai and that he had four daughters. Anandaraja read this as a clear sign that Charney would get angry even if she had legitimate concerns about the way his leadership was devaluing women.

5. Contrary to HR's claims, Charney was on notice of Singh's actions

405. On information and belief, Charney intervened in the HR investigation of Singh at least in part because he had been fully informed of and endorsed Singh's key actions as Director of AIGH, including his efforts to drive out Atkinson, Anandaraja and other "legacy staff," and Singh had written proof thereof.

406. On information and belief, the outcome of the investigation was also motivated by political considerations, just as Jones-Winter from HR had predicted. Specifically, Anandaraja learned that Starr had intervened in the investigation on Singh's behalf, tying the Arnholds' future funding to Singh's continued leadership of AIGH. Starr's commitment to Singh was later demonstrated at a regular Arnhold Foundations dinner in Fall 2018, when Starr found Murphy and screamed at him, exclaiming, "I thought you were a friend!" and "How can you do this?" Starr was clearly referring to the investigation against Singh and suggesting that Murphy orchestrated it, which Murphy did not. Starr also accused Murphy of bringing shame on Mount Sinai by causing trouble for a "fine man" like Singh and implied that Murphy had "incited his women" against Singh.

407. Charney told Murphy that he had spoken to Starr to tell him about the seriousness of the allegations against Singh, and that Starr had refused to believe them and had backed Singh, "his friend," implying that Mount Sinai had mismanaged the complaint. Starr also clearly tied a proposed future \$50 million donation to AIGH to Singh's continued employment as Director of AIGH.

408. Separately, Stern, Murphy and Anandaraja regularly spoke to Muller, Dean for Medical Education, and told him about the hostile environment Singh was creating. Muller reports directly to Charney and passed those concerns on and added some of his own.

409. For example, in January 2016, nearly a year after Singh was hired, but before he drove Atkinson and Anandaraja out of the Institute, Murphy and Muller exchanged several e-mails with a subject line stating: “He whose name can not be mentioned,” a reference to Lord Voldemort in the *Harry Potter* series, following up on a conversation about Singh:

Murphy: I tried I don’t think he gets it and I don’t think you’re [sic] talking to him will work I think we just have to wait and see when he implodes

Muller: He and I had a long conversation about a month ago and Anu tells me that there has been a noticeable positive difference since then. We also had a great meeting between Medical Education and the G[lobal] H[ealth] team, including Prabhjot. The meeting was excellent, so I’m hopeful....

Murphy: I believe he is brilliant and scheming. He will please those who are of service and dis those who no longer are. He obviously sensed that he needed to adapt in his conversation with you. Be cautious. Ramon

410. In October 2016, Muller exchanged e-mails with Stern about Singh. Stern wrote, “I had a very good and poignant meeting with Ramon tonight. He gave me a play by play of [Singh], much of which I found stunningly bad.” Muller replied, in pertinent part:

I also had a meeting with Dean Charney last week. it was our standing meeting but [Singh] and global health came up because of the impact on our budget. We ended up having a pretty intense conversation about the current state of global health, [Singh]’s approach to education, and in particular his approach to Ramon. Dennis was not pleased with the way [Singh]’s handled things and asked me if I would meet with him and [Singh] to get him on the right track. In the setting of that discussion I shared with [Charney] that you and I have met, and what our intentions are. He was enormously grateful that you and the Board would even consider doing this, and wants to add that to the agenda when he and I meet with [Singh].

411. Murphy also confronted Landrigan about his responsibility for what was happening at AIGH. Murphy told Anandaraja it was a difficult conversation, that Landrigan tried to cover for himself but mostly looked sad and defeated.

412. In February 2018, Atkinson went to see Muller to discuss an issue involving the history webpage of the Human Rights Program at Mount Sinai. Part of their discussions included a controversy about another male physician who had abruptly left Mount Sinai, about whom

Muller said: “he reminds me of someone else we know.” Atkinson said, “You mean PS [Prabhjot Singh]?” Muller replied “Yes, he’s an evil person.”

413. At that time, Muller was overseeing the drafting of a webpage describing the history of Mount Sinai’s Human Rights Program. Muller refused to publish a full narrative of the program’s history, which would entail acknowledging Atkinson’s lead role in re-establishing the program after it had collapsed when the male physician was, on information and belief, asked to leave Mount Sinai, choosing instead to not have a history webpage at all. When Atkinson questioned this, Muller shut her down in an e-mail on March 7, 2018; yet another example of Mount Sinai’s culture of minimizing and “disappearing” the contributions of women in order to bury sordid behavior on the part of other faculty members.

414. The Arnhold family, through Starr, was also aware of Singh’s failures as AIGH Director. In a meeting among Starr, Murphy, Landrigan and others on November 1, 2016, Starr admitted that he knew staff at AIGH were unhappy with their work environment and with Singh specifically. Starr also stated that Singh’s performance was poor and that he was not meeting any metrics.

415. After she resigned from AIGH, Anandaraja received a call from Starr. He said he had recently visited AIGH and had been alarmed to learn that Singh had not developed a vision or mission statement for the organization, and that no one on the staff had been able to explain what goals they were working towards. Starr also told her he had heard serious criticism of Berman’s conduct, and that he had advised Singh to fire Berman.

6. Senior figures at Mount Sinai repeatedly advise Anandaraja not to complain about Singh because Charney will not listen

416. Anandaraja regularly participated in meetings with Mount Sinai’s leaders at Chair and Dean level, and heard consistently that people found Singh hard to comprehend, that he was

perceived as arrogant and dismissive and that he was difficult to work with. People at leadership levels including Landrigan, Muller, and Murphy were well aware of the hostilities and difficulties experienced by AIGH employees. However, there was a fear of passing that feedback to Charney, since Singh was so clearly his golden boy.

417. Anandaraja had one-on-one meetings with Muller every month, in which she freely discussed Singh's personality, leadership and management issues. Anandaraja beseeched help from Muller in May 2015 because Singh was withholding information about future staffing, programming, and budgets, even asking him to get the information from Singh so Singh would not punish her for asking for it again. She described the environment at AIGH to him as the "Hunger Games."

418. At first, Muller told Anandaraja that telling Charney about all the problems Singh was creating would be futile. Since Charney favored him so strongly, any criticism would cause Charney to disfavor the critic.

419. As Singh's conduct worsened, however, Muller told Anandaraja in May 2018 that he had after all relayed her concerns to Charney – contrary to his later claim that he had heard no criticisms of Charney until the Plaintiffs' June 2018 HR complaint. Landrigan and Murphy also told Anandaraja that they had raised serious concerns about Singh to Charney.

420. But Muller, Landrigan and Murphy also told Anandaraja not to expect anything to change. Singh was Charney's pick and he would not want to reverse himself. Moreover, Murphy told Anandaraja that Charney had given Singh permission to get rid of the senior women at AIGH when he started. He told her to watch her back and be a team player because Charney was guiding Singh's decisions.

O. DEVELOPMENTS SINCE THE SDNY LITIGATION BEGAN

421. Since the SDNY Litigation was filed on April 26, 2019, there have been several developments relevant to the allegations advanced herein.

1. Silva alters relevant documents

422. While Khan was employed at AIGH, it was common practice for members of the ATLAS team to store documents in Google Drive, a cloud computing platform. Khan's access to the platform was not revoked despite his departure from AIGH. As a result, Khan continued to have access to AIGH-related files in Google Drive, including the Final USAID Report. It is likely that other former employees also continue to have access to such files.

423. At 2:36 pm on May 28, 2019—more than a month after the original Complaint in the federal lawsuit was filed and served on all the Defendants—Silva edited the Google Doc document that AIGH's staff used to collaborate on the Final USAID Report, which had been completed and published in or around Fall 2017. Specifically, Silva "resolved" (that is, made disappear) a comment he had originally inserted in the document on December 19, 2017 when it was "live."

424. The comment itself read, "This is the new block of text I have added to the report. Can you please take a look at it?" That block of text showed him to be the author of some of the false statements in the Final USAID Report, namely that ATLAS had a "16% of secondary health coverage services in the country. Each health district has a Nurse and a Health Supervisor, while each health area has an Epidemiologist, providing a total of 224 ATLAS core users" (see ¶ 289). Making the comment disappear meant that the document no longer showed that Silva had authored the false statement. However, Khan was able to see the resolved comment in the document's

editing history. It thus appears that Silva resolved the comment in order to cover his tracks in the wake of the SDNY Complaint and its allegations of AIGH making false statements to USAID.

425. Earlier in the same week, Silva “shared” the Final USAID Report with Singh within Google Drive, with edit rights—i.e., Singh was given the permissions needed to edit the document though it had been finished and sent to USAID long before. Plaintiffs do not know whether Singh made any edits to it subsequent to the filing of the SDNY Complaint.

2. Current and former faculty, staff and students sign letters of support

426. In the wake of the federal complaint, a large number of current and former faculty, staff and students at the Icahn School of Medicine signed open letters to Mount Sinai’s Board of Trustees (the “Board”) that lamented what the complaint described about Mount Sinai and demanded immediate action.

427. The letter from current students (some of whom have since graduated), received over 300 signatures. It states that they feel “compelled to speak out” in light of the “shocking acts of discrimination” described in the SDNY Complaint similar to their own experiences, and calls on Mount Sinai’s leadership to “prevent further perpetuation of an abusive culture.”

428. The letter on behalf of Mount Sinai alumni, with over 200 signatures, praises the plaintiffs for “empowering medical students, residents and fellows through direct, mentorship and building [Mount Sinai’s] curriculum on human rights and health justice,” and similarly demands action.

429. The letter from current faculty and staff at Mount Sinai received over 400 signatories. All of these people ultimately report to Defendant Charney. Yet they were willing to put their names on a statement declaring that they were “saddened and profoundly disturbed” by the allegations in the federal complaint, asking the Board to take “decisive action,” and calling for

a “culture shift.” Some of the signatories are only two levels down from Charney in the Mount Sinai hierarchy, an indication of how much they are willing to stick their necks out to help Mount Sinai become a fair place to work.

430. These letters went unanswered for many weeks, prompting a chaser from student organizers to the Board. On May 22, 2019, the co-chairs of the Board responded that they were appointing an internal committee to investigate the allegations but provided no details of the committee’s composition, goals or timelines. No further announcements were made by the Board since 2019.

431. In early January 2020, a group of the original letter writers sent another e-mail to the Board, copying the Co-Chairs and Davis, asking for updates and inviting them to discuss how to address ongoing concerns in person. While Ken Davis (“Davis”), the CEO of Mount Sinai, acknowledged receipt of this e-mail, neither he nor the Board ever responded to it, or the three original letters, in any substance.

3. Charney remains in his post; Singh remains at Mount Sinai

432. In the wake of the HR investigation, Mount Sinai learned to trumpet the ideals of gender equity. In October 2018 the school had declined to be a founding signatory of Time’s Up Healthcare (“TUHC”), but after the SDNY Complaint was filed, a blizzard of e-mails from senior figures including Charney endorsed improving opportunities for women. In January 2019, the school created a Dean of Gender Equity and gave the position to Dr. Carol Horowitz (“Horowitz”); her other responsibilities, however, meant she could devote only one-quarter of her time to this role. On August 27, 2019, after the SDNY Complaint was filed, Mount Sinai finally announced it had joined TUHC, a delay of ten months after TUHC since being asked and only after many other major hospitals and medical schools had joined.

433. The day before the First Amended Complaint in the SDNY Litigation was filed as agreed with Defendants, perhaps in anticipation of it, Mount Sinai leaders sent a school-wide e-mail announcing several reforms aimed at improving the treatment of women and minorities. These included not permitting any panels to speak at Medical School meetings that contain no women or minorities; a “recently expanded and significantly updated Diversity Statement”; a new Gender Steering Committee with no clearly communicated agenda or mandate; student listening sessions led by a senior dean; and revamped complaint processes. “These steps are important, but we know we have more to do,” says the statement. One of these steps included hiring public relations firms to promote Mount Sinai’s new pro-female image.

434. Plaintiffs are gratified that the SDNY Litigation has apparently been a catalyst for getting Mount Sinai’s leaders to acknowledge what hundreds of its students, alumni and current employees describe as a culture that needs fixing. The changes Mount Sinai has introduced in its wake, in particular Singh’s stepping down as a Director of AIGH, essentially confirm that Plaintiffs’ claims have merit.

435. But it is not clear how far Mount Sinai’s ostensible change of direction goes beyond cheery e-mails. Charney, Singh’s protector and enabler, remains in his job. Mount Sinai’s lawyers are defending Singh, Silva and Charney in the SDNY Litigation and this one, despite considerable evidence of their misconduct and the admissions by Lowy (see ¶¶ 385-395). No plaintiffs in either suit have received an apology. There is nothing wrong in Mount Sinai agreeing to fine principles, but gauzy new initiatives do not address the real casualties of its past behavior. “Mistakes were made” – but apparently not by anyone now willing to take responsibility for them and make amends.

436. Despite Mount Sinai's many visible efforts towards equity, Plaintiffs herein continue to be contacted by female and minority employees and students from across the Mount Sinai Health System with similar reports of discrimination, harassment and retaliation. Since 2019 the plaintiffs have collectively spoken to over 100 Mount Sinai employees and students. Unfortunately, many of these also describe the failure of internal structures including HR, the Title IX Office, Labor Relations and the new Office of Gender Equity in Science and Medicine, to protect them or address their concerns, and many report outright retaliation after blowing the whistle.

437. Mount Sinai's failure to adequately address a deeply entrenched and top-down culture of discrimination and abuse is also evidenced by difficulty recruiting female trainees to their training programs. In the past three years, despite their concerted effort to recruit female candidates and claims of being "a strong supporter of Women in Cardiology", the Cardiology Program at Mount Sinai has stumbled in recruiting women fellows (in 2019 and 2021, no female candidates accepted). Female employees of the Cardiology Department reported that candidates were put off by Mount Sinai's nationwide reputation of "not being a good place for women," by the macho environment, by the lack of respect they were shown during their interview process, and by the obvious unhappiness of many existing female employees.

i. Singh's continued employment at Mount Sinai

438. Singh's story is particularly instructive. On July 3, 2019, Charney informed the Medical School that Singh had "chosen to step down" as Director of AIGH and Chair of the Department of Health System Design and Global Health. In his notice about Singh's departure, Charney thanked him for his "dedicated work as Chair and Director," and praised his "devotion to [the school's] mission and success." In a separate statement issued through a public relations

consultant, not contradicted by Mount Sinai, Singh proclaimed that he was able to “step aside . . . knowing that the attacks on [his] integrity and . . . work have been investigated and proven false.” In a response to a student group, Davis similarly stated that the allegations had been investigated and were “unfounded.”

439. The contrast with Mount Sinai’s treatment of the Plaintiffs is stark. They were bullied, retaliated against, and in most cases pushed out of the institution. They continue to suffer consequences both to their mental health and their professional reputations. Singh, meanwhile, was allowed to control both the timing and messaging of his resignation as AIGH’s Director, and remains a Mount Sinai employee.

440. It is instructive that other institutions have not been so tolerant. In the wake of the SDNY Complaint, Singh was deselected as an Associate Editor of Annals of Global Health, a peer-reviewed journal supported by the Boston College Global Health Program. He has also recused himself as Co-Investigator for the Commonwealth Fund grant, at the Fund’s request.

ii. Faculty Wellbeing Survey summary is edited to remove key and troubling statistics

441. Mount Sinai’s OWBR conducted a survey from December 2018 to February 2019, gathering responses from nearly 1,900 Mount Sinai faculty members. Ripp and his colleagues condensed the findings into a report to share with faculty, which included data illustrating every key aspect of the survey, including troubling statistics showing that 25% of Mount Sinai’s female faculty members reported having been victims of sex discrimination within the last twelve months, and 13% of female faculty reporting sexual assault in that time period. 6.8% of respondents (of any gender) reported being treated unfairly because of race, ethnicity or religion.

442. On information and belief, Charney sanitized the report, releasing instead a purely narrative text which excluded all of the actual data about sex discrimination, sexual assault or

racial discrimination. When Anandaraja expressed concern to her colleagues that the final text did not fairly represent the survey, she was told that those decisions were made “above [their] pay grade.”

iii. Mount Sinai’s student body challenges Charney and his leadership

443. Mount Sinai’s students have continued to question its policies. During an InFocus 8 course in 2019, students received a training session on Mount Sinai’s updated student mistreatment policy. Muller and Dr. Peter Gliatto, Mount Sinai’s Dean of Student Affairs at the time, were present. At the end of the session, two female students queried how they could possibly trust Mount Sinai’s management if its top tier continued to say that the Plaintiffs, who had followed Mount Sinai complaints policies to the letter in reporting Singh, were liars. Muller simply acknowledged the paradox and moved on in the discussion.

444. On January 17 and January 24, 2020, medical students organized a protest outside Mount Sinai’s main hospital, demanding “Answers, Action and Accountability” from Mount Sinai’s leadership. They cited recent incidents, including the handling of this lawsuit and some Defendants’ continued presence at Mount Sinai as causes for concern. Their flyer stated that the protest was also “a response to the recent NY Post and NY Magazine articles highlighting unacceptable conditions and behaviors in the Mount Sinai Emergency Department and evidence of links between Mount Sinai Board of Trustees and Jeffrey Epstein’s illegal activities.”

445. Mount Sinai’s Student Council hosted a public meeting that included students, Dean for Gender Equity Horowitz, Muller and Charney on January 27, 2020. Students were invited to submit questions on an online platform and then vote for the ones they thought were most important to discuss at the forum. Some of the most popular questions included why Singh remained a faculty member given the serious allegations against him, and why the Dubin family

had been allowed to remain on Mount Sinai's board given their close connection with Jeffrey Epstein. They were not answered.

446. Instead, Charney, Horowitz and Muller had a general discussion about how the institution would address its systemic problems, with Horowitz vaguely stating that there was "room for improvement" and she was open to suggestions. At the end of the meeting, students were told that they would receive answers to any unanswered questions via e-mail. No such e-mail was ever sent.

4. Anandaraja is separated from her colleagues and excluded from work streams

447. Anandaraja's first day back at work after the SDNY Complaint was filed was May 13, 2019. She met with Ripp, her supervisor, who said that he realized she might be in a sensitive situation, but that he wanted her to be comfortable, and as far as he was concerned, it's all "business as usual." Ripp then asked whether Anandaraja felt uncomfortable in her current office location as she was currently seated with some of Mount Sinai's legal team, and offered to find her a new office. Anandaraja replied she was happy with her current location and did not see a reason to change it. A few weeks later, when Anandaraja returned from a period of leave, the members of Mount Sinai's legal team who used to sit near her had been moved. Hennig later confirmed to Anandaraja that he had heard that the legal team members were moved because Anandaraja had "refused" to move.

448. One of Anandaraja's projects in her new role at Mount Sinai was the introduction of lactation rooms, for which she advocated and worked towards in partnership with numerous Mount Sinai leaders, including Horowitz. This initiative was eventually formalized and became a Lactation Room Taskforce led by Horowitz's office. On Tuesday, May 14, Anandaraja learned

the taskforce's inaugural monthly meeting was scheduled for the following day, Wednesday, May 15, 2019.

449. Despite Anandaraja's significant involvement in this project, she was excluded from the calendar invite and related e-mails. She was understandably concerned about this development and asked Ripp about it, who said he would look into it. In the meantime, Anandaraja told him that she planned to attend the meeting regardless of the missing invitation, and Ripp allowed this.

450. Having not heard from Ripp before the meeting's scheduled start, Anandaraja attended it and participated in the discussion. Afterwards, Anandaraja asked Horowitz's assistant why she was not included on the attendee list. The assistant appeared surprised, unable to answer.

451. On Tuesday May 14, Anandaraja learned that an urgent meeting had been scheduled for Ripp and Horowitz to review the gender-related data from the faculty survey. Anandaraja had not been invited, even though she had been working on both the faculty survey and gender issues up until that time, and although the job description she had settled with Ripp had specified her involvement in gender-related issues. For her remaining time with the OWBR, Anandaraja was not invited to any of the numerous meetings that were held about gender data and programs. She was specifically excluded from any meetings with Horowitz and her team.

5. Anandaraja again resigns from Mount Sinai

452. On September 15, 2020, Anandaraja met with Ripp to resign from OWBR. She told him that she could "no longer take the moral injury of working for Mount Sinai." She explained that she felt like she was no longer able to have an impact at Mount Sinai due to both what happened at AIGH and the reactions of her colleagues to the SDNY Litigation, and that opportunities to advance her career at Mount Sinai had been irreparably damaged. Ripp said that

he could not argue with anything that she was saying, and that although he was sorry that she was leaving, he understood why.

453. On October 14, her official last day at work, Anandaraja submitted her letter of resignation to Ripp and to Charney, and copied colleagues in OWBR and Global Health. The letter was shared by her peers on social media and went viral, garnering over 40,000 reads and soliciting wide support from colleagues who applauded her courage in speaking out about discrimination at Mount Sinai.

P. HARM TO PLAINTIFFS

454. AIGH was a hostile environment for women, at first focused on the older “legacy staff,” but continuing after their departure. Between Singh’s gaslighting and denigration backed by Charney, Berman’s angry outbursts and Silva’s abusive name-calling, the Plaintiffs each suffered damage to their well-being and mental health.

1. Atkinson

455. Singh’s pattern of insulting and ignoring Atkinson made her feel inadequate and incompetent. He berated her until she had an emotional breakdown in front of him. Atkinson started to feel despondent and depressed, questioning her own capabilities despite decades of accomplishments. Singh’s belittling caused her significant anxiety; she experienced severe stress and developed insomnia.

456. The harm Singh inflicted on Atkinson’s well-being was acute in the weeks prior to her departure but continued thereafter. Early in the morning of March 1, 2019, Atkinson viewed the launch video prepared by Time’s Up Healthcare, which was to be shown at the new organization’s launch event to be held at the New York Academy of Medicine later that day. To her shock and horror, Singh was in the video endorsing the group’s mission of promoting women

in medicine. The experience of watching Singh claim to be an ally for women in healthcare, when Atkinson knew him in fact to be precisely the opposite, left her sobbing and shaking.

457. Atkinson contacted the leadership team at Time's Up Healthcare, telling them that Singh had been the subject of an internal complaint by women at Mount Sinai. By the time of the launch later that evening, the clip of Singh had been removed. Atkinson learned that Time's Up Healthcare had asked him to participate because he had been tweeting pro-women items, and he did not inform them about the complaint; when asked later by Time's Up Healthcare officials why he hadn't, Singh said he had been "ambivalent" about participating and admitted he thought he might be removed before it was released—the only (if still muted) indication of remorse Plaintiffs have ever heard from Singh about his conduct towards them.

458. Atkinson's professional reputation suffered due to Singh's denigration of her performance. He told people that the Gogels had refused to make another donation to fund her work because they were dissatisfied with it, which was untrue.

459. He also defamed Atkinson by telling many people over the course of several years, before she left AIGH and afterward, that she was inappropriately conducting "sex exams" in her Mount Sinai office, insinuating highly unprofessional if not criminal behavior on her part.

460. Atkinson has suffered bouts of depression periodically since December 2015 due to the harm inflicted by Singh and Mount Sinai and fear of retaliation by them, and has been treated by her primary care physician with anti-depressant medication.

461. While Atkinson was fortunate to find employment after she left AIGH, she was no longer working in her field of expertise, Health and Human Rights, to which she had devoted much of her career. Her pathbreaking and prominent career in global health and human rights was

destroyed, along with it her international leadership roles in combatting human trafficking and female genital cutting.

2. Anandaraja

462. Anandaraja was self-employed for two years after her departure from AIGH and has incurred financial losses as a result. At AIGH, Anandaraja earned \$150,000 annually and received health benefits and retirement contributions; while unemployed, she had to live off her savings and pay out-of-pocket for marketplace health insurance or use Medicaid. When she finally returned to Mount Sinai in a different job, she received the same base salary as she had at AIGH. Her period of unemployment therefore cost her not only two years' salary and benefits, but also customary salary increases and her retirement savings.

463. The deterioration in her financial position also meant that she was unable to continue to make mortgage payments on her apartment, and she was forced to sell it in a hurry. She had lived in the apartment for eleven years, made a significant investment in it and had hoped to make a significant profit on it at some point in the future. She now shares a rental apartment with a friend. The stress and other health repercussions associated with selling her apartment under value and finding alternative accommodation under pressure of time was significant.

464. Singh significantly damaged Anandaraja's professional reputation by misrepresenting the reasons for her departure. Singh's lies that Anandaraja had been terminated due to poor job performance impugned her work and her contributions to AIGH. Singh also viciously attacked Anandaraja's reputation, integrity, professionalism and trustworthiness by claiming that she had been misappropriating AIGH funds and behaving inappropriately with her partner on an AIGH trip – all fabrications by Singh. For these reasons, Anandaraja found it more

difficult to build relationships within leadership circles after she left AIGH than she had before Singh become AIGH's Director.

465. Singh's lies about Anandaraja also caused damage to important business-related relationships. In particular, two close colleagues (and friends), Bischoff and Murphy were told by Singh that Anandaraja had been undermining their own work efforts. This undermined trust that had been built up over many years, and damaged bonds Anandaraja treasured. The rift that Singh caused between Murphy and Anandaraja was particularly unfortunate given Murphy's declining health during this time and his death only two years later.

466. Anandaraja's career trajectory in global health was completely disrupted by Singh. Before Singh's arrival at AIGH, Anandaraja's career was on an upward curve. She organized conferences, co-chaired city-wide committees and directed a major academic global health program at Mount Sinai.

467. Singh cut Anandaraja off from New York City's global health scene, demoted her from Director to Program Director during her time at AIGH and sidelined her internally as well as externally from the network of institutions and donors that could provide advancement. There is now a gap of several years in Anandaraja's academic CV which cannot be fixed. Her promotions track was interrupted and the demotion from Director to Program Director that is necessarily reflected in her CV casts doubt on her abilities and performance as an employee of AIGH. As a result, Anandaraja is no longer able to achieve a high-level a career in Global Health.

468. The damage to Anandaraja's relationships and reputation was made substantially worse by her involvement, at Singh's direction, in terminating or reducing the salaries of longtime colleagues at AIGH without a clear rationale or guidance for the future. Those colleagues rightly felt aggrieved at the way they were treated. Anandaraja's reputation and relationships have

suffered as a result, despite the fact that she had objected to treating them this way, and did so only because Singh ordered it.

469. Anandaraja's physical health deteriorated noticeably while working for Singh. She often worked overtime at night and on weekends to carry out the meaningless tasks he assigned. In her attempts to buffer Singh's negative effect on her staff, Anandaraja took the stress on her own body. She lost significant amounts of weight, and her hair greyed.

470. Singh's constant denigration caused Anandaraja to doubt her competence, judgment and value. He derided her abilities and pressured her to cut programs and to terminate her projects, causing her extreme anxiety. Her experience terminating relationships with international partners and firing or reducing the salaries of longstanding colleagues without proper justification or guidance caused her further significant anxiety and distress.

471. During her time at AIGH and for many months afterwards, Anandaraja suffered from nightmares, difficulty sleeping and concentrating, depression, persistent feelings of anger and an inability to trust others. She continued to fear Singh, sweating and feeling her heart rate increasing when she saw people who looked like him. She has had to undergo intense counseling and professional coaching to create a new direction for her career and move forward.

472. Mount Sinai's institutional response to the investigation and the SDNY Litigation ended Anandaraja's ability to progress as an employee at Mount Sinai.

3. Caliendo

473. The workplace toxicity Caliendo experienced at AIGH has affected all parts of her life. After Berman yelled at her and made her fear he would hit her, she cried every day before work for a week. She felt traumatized and scared to go to work. Caliendo suffers from Crohn's

disease, which she reported to AIGH. Her symptoms had been under control before she started at AIGH, but they returned and worsened due to stress and now affect her daily life.

474. In 2017, when Berman yelled at her after returning from Aspen, Caliendo's Crohn's disease, which had been in remission, became so severe she could not eat solid food without pain and had to go on a liquid diet for two months. Caliendo also began to experience recurring Crohn's-related infections, which she had not suffered before.

475. Working for Singh and Berman made Caliendo feel incompetent and inadequate. They ruined her self-esteem and confidence. She has suffered from anxiety due to her experiences with them and has been unable to hold down stable employment after she left AIGH, as she fears that other employers will also mistreat her. While her salary was \$74,000 at AIGH, her income dropped to around \$40,000 in 2018.

4. Khan

476. Before joining AIGH, Khan enjoyed a successful career as a Product Manager and was confident in his abilities. But Silva's constant undermining made him feel self-conscious, and he came to doubt his skills and abilities. This, coupled with Singh's misrepresentations about ATLAS – the core of Khan's work – demoralized him and made him hate going to work.

477. Even in his new role outside AIGH, Khan now constantly doubts and second-guesses himself. He feels very self-conscious around his co-workers and friends and has become more private. Like the other Plaintiffs, the bad behavior he saw institutionalized at Mount Sinai has made him lose faith in institutions. He also has trouble focusing on his work and has developed unhealthy eating habits. Khan gained approximately 20 pounds while he worked at AIGH and was the heaviest he had ever been. For a long time, he also suffered from frequent stomach pains and diarrhea.

Q. CONCLUSION

478. Mount Sinai told several of the women who had filed a complaint about Singh in 2018 that they had determined he had not discriminated against them as women, because it was clear he was sometimes an unpleasant, erratic boss to men too.

479. But the facts show he had a particular animus towards women; and for that the laws of New York provide a remedy.

480. In fact, the idea that Singh was an “equal opportunity jerk” may be attractive to Mount Sinai, but in addition to being scant consolation to those who worked there, is not true. Singh’s behavior overflowed with examples of targeting older people and women in particular for abuse. He stated directly and repeatedly that he wanted to work with people “ideally in their twenties and thirties” (¶ 131) and younger people (¶ 212). He demeaned highly accomplished “legacy staff,” mostly women over 40, in public and private (¶¶ 148-164, 214-238), promoted less qualified men over them (¶ 237), pointedly ignored them in meetings and elsewhere (¶¶ 171, 311), gave menial work to them but not to similarly situated men (¶¶ 137-144, 171), demoted women (¶¶ 172, 237-238) and created such a hostile environment that they were driven from the Institute. He allowed Silva to keep targeting women with outrageously demeaning and sexual comments (¶ 354-355), even after he was told they were offensive and problematic (¶ 355).

481. Indeed, Singh’s flagrant abuse of his female and older subordinates did not come in a vacuum. Charney apparently hired Singh casually (¶ 364) and gave Singh cover as he ran AIGH. He too screamed at women and made them scapegoats when men were equally responsible for outcomes he disliked (¶ 73). He likes being feared (¶ 13). Charney bullied Strathdee, the distinguished professor chosen by the search committee to run AIGH, and wrote her an e-mail calling her an IDIOT in red capital letters (¶¶ 70-71). In this environment, it is perhaps not

surprising that AIGH staff could not get Mount Sinai to take seriously the deeply dysfunctional, abusive, sexist and ageist environment Charney's protégé, Singh, was creating, to say nothing of his lies about ATLAS to funders including the federal government. Complaints poured into HR (§§ 144, 363, 366), even to Charney himself (§§ 405-415), but nothing happened despite HR believing that Singh had harmed over twenty women (§ 380). Charney intervened in the investigation (§ 405) and publicly praised him, even as internal and external pressure finally overwhelmed Charney's desire to keep Singh as AIGH Director.

CAUSES OF ACTION

AS AND FOR A FIRST CAUSE OF ACTION – UNLAWFUL SEX AND AGE DISCRIMINATION – DISPARATE TREATMENT

NYSHRL and NYCHRL

(By Atkinson Against Singh, Charney, and Mount Sinai)

482. Plaintiffs repeat and reallege the allegations above, as if fully set forth herein.

483. At all relevant times, Atkinson was a female employee of Mount Sinai over the age of 40 whose education, background, experience, and established employment history made her exceptionally qualified for her position.

484. At all relevant times, Mount Sinai was an employer within the meaning of the NYSHRL, N.Y. Exec. Law § 292(5), and the NYCHRL, N.Y.C. Admin. Code § 8-102.

485. At all relevant times, Singh was an employee or agent of Mount Sinai who, as Director of AIGH, controlled the terms and conditions of Atkinson's employment and had the power to do more than carry out personnel decisions made by others.

486. At all relevant times, Charney was an employee or agent of Mount Sinai who, as Dean of the Icahn School of Medicine, had the power to do more than carry out personnel decisions

made by others and aided, abetted, incited, compelled, or coerced discriminatory acts against Atkinson.

487. By the acts and practices described above and herein, Defendants, individually and collectively, unlawfully subjected Atkinson to discrimination on the basis of sex and/or age while she was employed by Mount Sinai.

488. Mount Sinai was placed on actual notice of the discriminatory and hostile environment created and endorsed by Singh and Charney.

489. Despite this actual notice, Mount Sinai failed to take reasonable corrective measures to stop Singh and Charney from discriminating against Atkinson on the basis of sex and/or age.

490. By their discriminatory and hostile treatment, Defendants treated Atkinson less well than other employees because of her gender and/or age.

491. As a result of Defendants' unlawful actions, Atkinson suffered an adverse employment action that materially changed the terms and conditions of her employment, including but not limited to reduction in compensation.

492. Defendants' unlawful actions were intentional, willful, malicious and/or done with reckless disregard for Atkinson's rights.

493. As a result of Defendants' discriminatory actions, Atkinson has and/or will continue to suffer irreparable injury including but not limited to: lost earnings, humiliation, mental anguish, insomnia, emotional distress and damage to reputation.

494. As a result of those actions and consequent harms, Atkinson has suffered such damages in an amount to be proved at trial.

495. By reason of the foregoing, Atkinson requests relief as described in the Prayer for Relief below.

**AS AND FOR A SECOND CAUSE OF ACTION – UNLAWFUL SEX AND AGE
DISCRIMINATION – HOSTILE WORK ENVIRONMENT
NYSHRL and NYCHRL
(By Atkinson Against Singh, Charney and Mount Sinai)**

496. Plaintiffs repeat and reallege the allegations above, as if fully set forth herein.

497. At all relevant times, Atkinson was a female employee of Mount Sinai over the age of 40 whose education, background, experience, and established employment history made her exceptionally qualified for her position.

498. At all relevant times, Mount Sinai was an employer within the meaning of the NYSHRL, N.Y. Exec. Law § 292(5), and the NYCHRL, N.Y.C. Admin. Code § 8-102.

499. At all relevant times, Singh was an employee or agent of Mount Sinai who, as Director of AIGH, controlled the terms and conditions of Atkinson's employment and had the power to do more than carry out personnel decisions made by others.

500. At all relevant times, Charney was an employee or agent of Mount Sinai who, as Dean of the Icahn School of Medicine, had the power to do more than carry out personnel decisions made by others and aided, abetted, incited, compelled, or coerced discriminatory acts against Atkinson.

501. By the acts and practices described above and herein, Defendants, individually and collectively, unlawfully subjected Atkinson to a hostile work environment on the basis of sex and/or age while she was employed by Mount Sinai.

502. Mount Sinai was placed on actual notice of the discriminatory and hostile environment created and endorsed by Singh and Charney.

503. Despite this actual notice, Mount Sinai failed to take reasonable corrective measures to stop Singh and Charney from creating and fostering a hostile work environment in AIGH on the basis of sex and/or age.

504. Defendants' hostile and abusive conduct was sufficiently severe and pervasive to alter the terms and conditions of Atkinson's employment with Mount Sinai.

505. Defendants' hostile and abusive conduct created an environment that a reasonable person would find hostile or abusive because of Atkinson's gender or age, and Atkinson subjectively perceived the workplace environment as hostile and abusive because of her gender and age.

506. By their discriminatory and hostile treatment, Defendants treated Atkinson less well than other employees because of her gender and/or age.

507. Defendants' unlawful actions were intentional, willful, malicious and/or done with reckless disregard for Atkinson's rights.

508. As a result of Defendants' discriminatory actions, Atkinson has and/or will continue to suffer irreparable injury including, but not limited to: lost earnings, humiliation, mental anguish, insomnia, emotional distress and damage to reputation.

509. By reason of the foregoing, Atkinson requests relief as described in the Prayer for Relief below.

**AS AND FOR A THIRD CAUSE OF ACTION – UNLAWFUL SEX AND AGE
DISCRIMINATION – HOSTILE WORK ENVIRONMENT
NYSHRL and NYCHRL
(By Anandaraja Against Singh, Charney and Mount Sinai)**

510. Plaintiffs repeat and reallege the allegations contained above, as if fully set forth herein.

511. At all relevant times, Anandaraja was a female employee of Mount Sinai over the age of 40 whose education, background, experience, and established employment history made her exceptionally qualified for her position.

512. At all relevant times, Mount Sinai was an employer within the meaning of the NYSHRL, N.Y. Exec. Law § 292(5), and the NYCHRL, N.Y.C. Admin. Code § 8-102.

513. At all relevant times, Singh was an employee or agent of Mount Sinai who, as Director of AIGH, controlled the terms and conditions of Anandaraja's employment and had the power to do more than carry out personnel decisions made by others.

514. At all relevant times, Charney was an employee or agent of Mount Sinai who, as Dean of the Icahn School of Medicine, had the power to do more than carry out personnel decisions made by others and aided, abetted, incited, compelled, or coerced discriminatory acts against Anandaraja.

515. By the acts and practices described above and herein, Defendants, individually and collectively, unlawfully subjected Anandaraja to a hostile work environment on the basis of sex and/or age while she was employed by Mount Sinai.

516. Mount Sinai was placed on actual notice of the discriminatory and hostile environment created and endorsed by Singh and Charney.

517. Despite this actual notice, Mount Sinai failed to take reasonable corrective measures to stop Singh and Charney from creating and fostering a hostile work environment in AIGH on the basis of sex and/or age.

518. Defendants' hostile and abusive conduct was sufficiently severe and pervasive to alter the terms and conditions of Anandaraja's employment with Mount Sinai.

519. Defendants' hostile and abusive conduct created an environment that a reasonable person would find hostile or abusive because of Anandaraja's gender and/or age, and Anandaraja subjectively perceived the workplace environment as hostile and abusive because of her gender and age.

520. By their discriminatory and hostile treatment, Defendants treated Anandaraja less well than other employees because of her gender and/or age.

521. Defendants' unlawful actions were intentional, willful, malicious and/or done with reckless disregard for Anandaraja's rights.

522. As a result of Defendants' discriminatory actions, Anandaraja has and/or will continue to suffer irreparable injury including, but not limited to: lost earnings, humiliation, mental anguish, stress, anxiety, depression, insomnia, emotional distress and damage to reputation. As a result of those actions and consequent harms, Anandaraja has suffered such damages in an amount to be proved at trial.

523. By reason of the foregoing, Anandaraja requests relief as described in the Prayer for Relief below.

**AS AND FOR A FOURTH CAUSE OF ACTION – UNLAWFUL SEX
DISCRIMINATION –DISPARATE TREATMENT**

NYSHRL and NYCHRL

(By Caliendo Against Singh, Charney, Berman and Mount Sinai)

524. Plaintiffs repeat and reallege the allegations contained above, as if fully set forth herein.

525. At all relevant times, Caliendo was a female employee of Mount Sinai whose education, background, experience, and established employment history made her exceptionally qualified for her position.

526. At all relevant times, Mount Sinai was an employer within the meaning of the NYSHRL, N.Y. Exec. Law § 292(5), and the NYCHRL, N.Y.C. Admin. Code § 8-102.

527. At all relevant times, Singh was an employee or agent of Mount Sinai who, as Director of AIGH, controlled the terms and conditions of Caliendo's employment and had the power to do more than carry out personnel decisions made by others.

528. At all relevant times, Berman was an employee or agent of Mount Sinai who aided, abetted, incited, compelled, or coerced discriminatory acts against Caliendo.

529. At all relevant times, Charney was an employee or agent of Mount Sinai who, as Dean of the Icahn School of Medicine, had the power to do more than carry out personnel decisions made by others and aided, abetted, incited, compelled, or coerced discriminatory acts against Caliendo.

530. By the acts and practices described above and herein, Defendants, individually and collectively, unlawfully subjected Caliendo to discrimination on the basis of sex while she was employed by Mount Sinai.

531. Mount Sinai was placed on actual notice of the discriminatory and hostile environment created and endorsed by Singh, Berman, and Charney.

532. Despite this actual notice, Mount Sinai failed to take reasonable corrective measures to stop Singh and Charney from discriminating against Caliendo on the basis of sex.

533. By their discriminatory and hostile treatment, Defendants treated Caliendo less well than other employees because of her gender.

534. As a result of Defendants' unlawful actions, Caliendo suffered one or more adverse employment action that materially changed the terms and conditions of her employment, including but not limited to unlawful termination.

535. Defendants' unlawful actions were intentional, willful, malicious and/or done with reckless disregard for Caliendo's rights.

536. As a result of Defendants' discriminatory actions, Caliendo has and/or will continue to suffer irreparable injury including: lost earnings, humiliation, mental anguish, stress, anxiety, emotional distress and physical injuries. As a result of those actions and consequent harms, Caliendo has suffered such damages in an amount to be proved at trial.

537. By reason of the foregoing, Caliendo requests relief as described in the Prayer for Relief below.

**AS AND FOR A FIFTH CAUSE OF ACTION – UNLAWFUL SEX DISCRIMINATION –
HOSTILE WORK ENVIRONMENT
NYSHRL and NYCHRL
(By Caliendo Against Singh, Charney, Berman and Mount Sinai)**

538. Plaintiffs repeat and reallege the allegations contained in above, as if fully set forth herein.

539. At all relevant times, Caliendo was a female employee of Mount Sinai whose education, background, experience, and established employment history made her exceptionally qualified for her position.

540. At all relevant times, Mount Sinai was an employer within the meaning of the NYSHRL, N.Y. Exec. Law § 292(5), and the NYCHRL, N.Y.C. Admin. Code § 8-102.

541. At all relevant times, Singh was an employee or agent of Mount Sinai who, as Director of AIGH, controlled the terms and conditions of Caliendo's employment and had the power to do more than carry out personnel decisions made by others.

542. At all relevant times, Berman was an employee or agent of Mount Sinai who aided, abetted, incited, compelled, or coerced discriminatory acts against Caliendo.

543. At all relevant times, Charney was an employee or agent of Mount Sinai who, as Dean of the Icahn School of Medicine, had the power to do more than carry out personnel decisions made by others and aided, abetted, incited, compelled, or coerced discriminatory acts against Caliendo.

544. By the acts and practices described above and herein, Defendants, individually and collectively, unlawfully subjected Caliendo to a hostile work environment on the basis of sex while she was employed by Mount Sinai.

545. Mount Sinai was placed on actual notice of the discriminatory and hostile environment created and endorsed by Singh, Berman, and Charney.

546. Despite this actual notice, Mount Sinai failed to take reasonable corrective measures to stop Singh, Berman, and Charney from creating and fostering a hostile work environment in AIGH on the basis of sex.

547. Defendants' hostile and abusive conduct was sufficiently severe and pervasive to alter the terms and conditions of Caliendo's employment with Mount Sinai.

548. Defendants' hostile and abusive conduct created an environment that a reasonable person would find hostile or abusive because of Caliendo's gender, and Caliendo subjectively perceived the workplace environment as hostile and abusive because of her gender.

549. By their discriminatory and hostile treatment, Defendants treated Caliendo less well than other employees because of her gender.

550. As a result of Defendants' unlawful actions, Caliendo suffered one or more adverse employment action that materially changed the terms and conditions of her employment, including but not limited to unlawful termination.

551. Defendants' unlawful actions were intentional, willful, malicious and/or done with reckless disregard for Caliendo's rights.

552. As a result of Defendants' discriminatory actions, Caliendo has and/or will continue to suffer irreparable injury including: lost earnings, humiliation, mental anguish, stress, anxiety, emotional distress and physical injuries. As a result of those actions and consequent harms, Caliendo has suffered such damages in an amount to be proved at trial.

553. By reason of the foregoing, Caliendo requests relief as described in the Prayer for Relief below.

**AS AND FOR A SIXTH CAUSE OF ACTION – UNLAWFUL RACE, RELIGIOUS, AND
NATIONAL ORIGIN DISCRIMINATION –
HOSTILE WORK ENVIRONMENT
NYSHRL and NYCHRL
(By Khan Against Singh, Silva, Charney and Mount Sinai)**

554. Plaintiffs repeat and reallege the allegations above, as if fully set forth herein.

555. Khan is from Pakistan, a South Asian and a Muslim. At all relevant times, he was an employee of Mount Sinai whose education, background, experience, and established employment history made him exceptionally qualified for his position.

556. At all relevant times, Mount Sinai was an employer within the meaning of the NYSHRL, N.Y. Exec. Law § 292(5), and the NYCHRL, N.Y.C. Admin. Code § 8-102.

557. At all relevant times, Singh was an employee or agent of Mount Sinai who, as Director of AIGH, controlled the terms and conditions of Khan's employment and had the power to do more than carry out personnel decisions made by others.

558. At all relevant times, Silva was an employee or agent of Mount Sinai who aided, abetted, incited, compelled, or coerced discriminatory acts against Khan.

559. At all relevant times, Charney was an employee or agent of Mount Sinai who, as Dean of the Icahn School of Medicine, had the power to do more than carry out personnel decisions made by others and aided, abetted, incited, compelled, or coerced discriminatory acts against Khan.

560. By the acts and practices described above and herein, Defendants, individually and collectively, unlawfully subjected Khan to a hostile work environment on the basis of race, religion, and/or national origin while he was employed by Mount Sinai.

561. Defendants' hostile and abusive conduct was sufficiently severe and pervasive to alter the terms and conditions of Khan's employment with Mount Sinai.

562. Defendants' hostile and abusive conduct created an environment that a reasonable person would find hostile or abusive because of Khan's race, religion, and/or national origin, and Khan subjectively perceived the workplace environment as hostile and abusive because of his race, religion, and national origin.

563. By their discriminatory and hostile treatment, Defendants treated Khan less well than other employees because of his race, religion, and/or national origin.

564. Defendants' unlawful actions were intentional, willful, malicious and/or done with reckless disregard for Khan's rights.

565. As a result of Defendants' discriminatory actions, Khan has and/or will continue to suffer irreparable injury including: substantial weight gain, stomach pains, and other physical injuries, humiliation, mental anguish, stress, and emotional distress. As a result of those actions and consequent harms, Khan has suffered such damages in an amount to be proved at trial.

566. By reason of the foregoing, Khan requests relief as described in the Prayer for Relief below.

AS AND FOR A SEVENTH CAUSE OF ACTION – RETALIATION
NYSHRL and NYCHRL
(By Khan Against Singh and Mount Sinai)

567. Plaintiffs repeat and reallege the allegations above, as if fully set forth herein.

568. At all relevant times, Khan was an employee of Mount Sinai whose education, background, experience, and established employment history made him exceptionally qualified for her position.

569. At all relevant times, Mount Sinai was an employer within the meaning of the NYSHRL, N.Y. Exec. Law § 292(5), and the NYCHRL, N.Y.C. Admin. Code § 8-102.

570. At all relevant times, Singh was an employee or agent of Mount Sinai who, as Director of AIGH, controlled the terms and conditions of Khan's employment and had the power to do more than carry out personnel decisions made by others.

571. In or around October 2017, Khan engaged in a protected activity by reporting Silva's racial, religious, and national origin discrimination and harassment to Singh.

572. Because of Khan's complaints, Singh and Mount Sinai were aware that Khan engaged in a protected activity.

573. As a direct result of and in retaliation for Khan's protected activities, Singh took adverse action against him by intentionally breaching his promise of anonymity in order to intimidate Khan and instill in him a fear of reprisal.

574. Defendants' adverse actions against Khan disadvantaged him and could well dissuade a reasonable employee from making or supporting a charge of discrimination.

575. As a result of Defendants' retaliatory actions, Khan has and/or will continue to suffer irreparable injury including substantial weight gain, stomach pains, and other physical injuries, humiliation, mental anguish, stress and emotional distress. As a result of those actions and consequent harms, Khan has suffered such damages in an amount to be proved at trial.

576. By reason of the foregoing, Khan requests relief as described in the Prayer for Relief below.

**AS AND FOR AN EIGHTH CAUSE OF ACTION – BREACH OF CONTRACT
(By Atkinson Against Mount Sinai)**

577. Plaintiffs repeat and reallege the allegations above, as if fully set forth herein.

578. Atkinson was employed by Mount Sinai pursuant to a written employment agreement dated March 27, 2013 (the "Employment Agreement").

579. The Employment Agreement provided that Atkinson was being appointed for "five years."

580. The Employment Agreement further provided that, after March 31, 2014, the "terms and conditions" of Atkinson's employment "will be governed by [the Icahn School of Medicine at Mount Sinai's] policies and procedures, including its Faculty Handbook from time to

time in effect,” and that her “compensation” “will be determined in accordance with the Faculty Compensation Policy in effect from time to time.”

581. The Faculty Compensation Policy provides that “[t]otal compensation [for faculty members] must be fair market value for the services rendered and must be commercially reasonable.”

582. On June 19, 2015, Singh informed Atkinson that she could remain employed with Mount Sinai only if she accepted a 40% reduction of her salary (from \$150,000 per annum to \$90,000 per annum) as well as further adjustments, including possible termination after Singh finished his full review of AIGH later that year.

583. \$90,000 per annum was not a “fair market value” for the services Atkinson provided, nor “commercially reasonable” given her skills and expertise.

584. By requiring Atkinson to accept a salary that did not reflect “fair market value” for the services she provided and that was not “commercially reasonable,” Mount Sinai breached the Employment Agreement.

585. As a result of Mount Sinai’s breach, Atkinson was deprived of her full salary of \$150,000 from September 2015 onwards.

586. Further or in the alternative, the Employment Agreement contained an implied covenant of good faith and fair dealing, which prohibited Mount Sinai from engaging in conduct which, although not expressly forbidden by any contractual provision, deprived Atkinson of her right to receive the benefits of the Employment Agreement.

587. Mount Sinai breached the covenant of good faith and fair dealing by requiring that Atkinson accept radically less attractive terms or else face termination.

588. As a result of Mount Sinai's breach, Atkinson was deprived of her full salary of \$150,000 from September 2015 onwards.

589. Further or in the alternative, Singh and Mount Sinai made Atkinson's working conditions so intolerable that she was constructively discharged in May 2016, in breach of her Employment Agreement, which provided that her appointment was for five years.

590. As a result of Mount Sinai's breach, Atkinson was deprived of her salary from May 2016 (when she resigned) to March 2018 (when her initial five-year appointment would have ended).

591. By reason of the foregoing, Atkinson requests relief as described in the Prayer for Relief below.

**AS AND FOR A NINTH CAUSE OF ACTION – RETALIATION
NYCHRL
(By Anandaraja Against Mount Sinai)**

592. Plaintiffs repeat and reallege the allegations above, as if fully set forth herein.

593. At all relevant times, Anandaraja was a female employee of Mount Sinai whose education, background, experience, and established employment history made her exceptionally qualified for her position.

594. At all relevant times, Mount Sinai was an employer within the meaning of the NYCHRL, N.Y.C. Admin. Code § 8-102.

595. On April 26, 2019, Anandaraja filed a duly notarized charge of employment discrimination based on sex, age, and retaliation with the EEOC as required by federal law.

596. On April 26, 2019, Anandaraja asserted claims in the SDNY Litigation for disparate treatment and hostile work environment on the basis of sex and age in violation of Title IX, the NYSHRL, and the NYCHRL.

597. Anandaraja's administrative EEOC charge and federal complaint constitute protected activities under the NYCHRL.

598. Shortly after Anandaraja filed her complaints, Defendants took adverse actions against her by ostracizing her and excluding her from continuing involvement in the Lactation Room Taskforce, which Anandaraja had previously championed.

599. Defendants took additional adverse actions by, among other things, cutting her out of all meetings and most activities relevant to her job.

600. Defendants' adverse actions disadvantaged Anandaraja and could well dissuade a reasonable employee from making or supporting a charge of discrimination.

601. But for her participation in these protected activities, Defendants would not have taken adverse action against Anandaraja.

602. As a result of Defendants' retaliatory actions, Anandaraja has and/or will continue to suffer irreparable injury including, but not limited to humiliation, stress, and anxiety. As a result of those actions and consequent harms, Anandaraja has suffered such damages in an amount to be proved at trial.

603. By reason of the foregoing, Anandaraja requests relief as described in the Prayer for Relief below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request judgment as follows:

- (a) On the First Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings and earning capacity, and out-of-pocket expenses, punitive damages and liquidated damages) in favor of Atkinson, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.
- (b) On the Second Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings and earning capacity, and out-of-pocket expenses, punitive damages and liquidated damages) in favor of Atkinson, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.
- (c) On the Third Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings and earning capacity, and out-of-pocket expenses, punitive damages and liquidated

damages) in favor of Anandaraja, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.

- (d) On the Fourth Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings and earning capacity, and out-of-pocket expenses, punitive damages and liquidated damages) in favor of Caliendo, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.
- (e) On the Fifth Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings and earning capacity, and out-of-pocket expenses, punitive damages and liquidated damages) in favor of Caliendo, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.
- (f) On the Sixth Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings

and earning capacity, and out-of-pocket expenses, punitive damages and liquidated damages) in favor of Khan, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.

- (g) On the Seventh Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings and earning capacity, and out-of-pocket expenses, punitive damages and liquidated damages) in favor of Khan, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.
- (h) On the Eighth Cause of Action, awarding damages in favor of Atkinson, in an amount to be determined at trial, plus pre- and post-judgment interest.
- (i) On the Ninth Cause of Action, awarding damages (including without limitation, damages for past, present, and future emotional pain and suffering, ongoing and severe mental anguish and physical injuries, compensation for harm to reputation, loss of past, present and future enjoyment of life, and past and future lost earnings and earning capacity, and out-of-pocket expenses, punitive damages and liquidated damages) in favor of Anandaraja, in an amount to be determined at trial, plus pre- and post-judgment interest, and attorneys' fees, costs and expenses authorized by the NYSHRL and the NYCHRL.

(j) Granting the Plaintiffs such other and further relief as the Court deems just and proper.

Dated: October 24, 2022

Maidenhead, United Kingdom

Respectfully submitted,

BY: Ann Olivarius

Dr. Ann McAllister Olivarius
New York Bar License 4608972
McALLISTER OLIVARIUS
641 Lexington Avenue
13th Floor
New York, New York 10022
(212) 433-3456
aolivarius@mcotaw.com

BY: John F.O. McAllister

Dr. John F.O. McAllister
New York Bar License 2219335
McALLISTER OLIVARIUS
641 Lexington Avenue
13th Floor
New York, New York 10022
(212) 433-3456
jmcallister@mcotaw.com

Attorneys for Plaintiffs