

JUDGE SCHEINDLIN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CARINA BERNARD, SENORA BOLARINWA,
JESSICA DURAND, KENDRA HINDS, JASMINE
VALENTIN, and LEEANN WIMMERS, on behalf of
themselves and all others similarly situated,

Plaintiffs,

-against-

16 CV 1473

DEPARTMENT OF CORRECTIONS AND
COMMUNITY SUPERVISION ("DOCCS") ACTING
COMMISSIONER ANTHONY ANNUCCI; CHIEF OF
INVESTIGATIONS FOR THE DOCCS OFFICE OF
SPECIAL INVESTIGATIONS, STEVEN MAHER;
DEPUTY CHIEF OF INVESTIGATIONS FOR THE SEX
CRIMES UNIT OF THE DOCCS OFFICE OF SPECIAL
INVESTIGATIONS, CHRISTIAN NUNEZ; DOCCS
DIRECTOR OF THE BUREAU OF LABOR
RELATIONS, JOHN SHIPLEY; DOCCS ASSOCIATE
COMMISSIONER OF THE OFFICE OF SEXUAL
ABUSE PREVENTION AND EDUCATION, JASON
EFFMAN;

CLASS ACTION
COMPLAINT

Defendants.
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