

IN THE UNITED STATES OF DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

WADE PYATT, ROBERTA PYATT ,)

WADENA PYATT & LILTESHA PYATT)

PLAINTIFF)

-against-)

HILTON HOMEWOOD SUITES,)

HILTON HAMPTON INN,)

HILTON WORDLWIDE HOLDINGS INC,)

GRAND PRIX LESSEE LLC,)

HILTON HOTEL MANAGEMENT LLC,)

HIGHGATE HOTEL MANAGEMENT,)

AIMBRIDGE HOSPITALITY)

DEFENDANT)

Complaint for Violation of Civil Rights

Compensatory and punitive damages
& Injunctive Relief

Case No.

CV 25 1478

KOVNER, J

Demand Jury by Trial

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

WICKS, M.J.★ MAR 17 2025 ★

LONG ISLAND OFFICE

RECEIVED

MAR 17 2025

EDNY PRO SE OFFICE

NOTICE

Federal Rules of Civil Procedure 5.2 addresses privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in *forma pauperis*.

I. The parties to This Complaint

A. The plaintiff(s)

Wade Pyatt, a retired bus driver for the Nassau County EOC Roosevelt HeadStart Program, who was in the process of relocating from New York to Alabama with his wife and family but was affected by the COVID pandemic and unable to move.

Mailing address: PO Box 44,
Coram, NY 11727
(516) 462-6421

Address for service if needed: 1615 Main Street, Apt 112
Port Jefferson, NY 11777

Roberta Pyatt, a retired business owner of Pyatt's Daycare, who was in the process of relocating with her husband Wade Pyatt and family from New York to Alabama but was affected by the COVID pandemic and unable to move.

Mailing Address: PO Box 44,
Coram, NY 11727
(516) 462-6421

Address for service if needed: 1615 Main St, Apt 112
Port Jefferson, NY 11777

Wadena Pyatt, a Civil rights Advocate, former 1st Vice-President of a Nassau County Branch of the NAACP, former Democratic Party Leader and professional singer/songwriter who stood to fight against racial and disability discrimination with her family.

Mailing Address: PO Box 44,
Coram, NY 11727
(516) 462-6421

Address for service if needed: 1615 Main St, Apt 112
Port Jefferson, NY 11777

Liltesha Pyatt, Caregiver and daughters of Wade Pyatt and Roberta Pyatt were in the process of relocating from New York to Alabama but was affected by the COVID pandemic and unable to move.

PO Box 44,
Coram, NY 11727
(516) 462-6421
Address for service if needed: 1615 Main St
Port Jefferson, NY 11777

B. The Defendant(s)

Defendant No.1

Hilton Homewood Suites
1585 Round Swamp Rd,
Plainview, NY 11803
(516) 293-4663

Defendant No.2

Hilton Hampton Inn
1600 Veterans Memorial Hwy,
Islandia, NY 11749
(631) 234-0400

Defendant No. 3

Hilton Worldwide Holdings Inc
7930 Jones Branch Drive,
McLean, VA 22102
(703) 883-5100 or (703) 883-5381

Defendant No. 4

Grand Prix Lessee LLC (Management/Hotel Owners/Foreign Liability Company who operates also from Hilton Hampton Inn)
1600 Veterans Memorial Hwy,
Islandia, NY 11749
(631) 234-0400

Defendant No. 5

Hilton Hotel Management

7930 Jones Branch Drive
McLean, VA 22102
(703)883-5100, (703) 883-5381

Defendant No. 6

Highgate Hotel Management
870 Seventh Ave (2nd Floor)
New York, New York 10019
(212) 707-4322

Defendant No. 7

Aimbridge Hospitality
5301 Headquarters Drive,
Plano, TX 75024
(972) 952-0200

Basis for Jurisdiction

Under 28 U.S.C. 1131, a case arising under the United States Constitution or federal laws or treaties is a federal question case, which allow claims alleging deprivation of any right and privileges by the Constitution and [federal laws], including all appropriate and adaption of *New York State Human Rights Law (NYSHRL)*. Under Civil Rights Act of 1964 Title II U.S.C. 2000a (a) (b)(c) that all persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages and accommodations of any place of public accommodation, as defined in this section, without discrimination on the ground of race, color religion, or national origin or any capacity, including pertaining to hotels. Title II of the Civil Rights Act of 1964 prohibits discrimination in places of public accommodation such as hotels, housing, based on race, religion, national origin and or harassment, fraud or retaliation. Title III of the American with Disabilities Act (ADA) prohibits discrimination based on disability in such places and or harassment and retaliation. Under 42 U.S.C 1981 which prohibits racial discrimination in contracting that includes hotel stays, denial of services or faced discriminatory treatment based on their race that violates a person right to make and enforce contracts. Under 42 U.S.C 1981 guarantees equal rights to all persons to make and enforce contracts, without regard to race. Any discriminatory action that interferes with a person's right to contract for and enjoy the services offered by a hotel, which is protected by 1981, including racial bias, harassment and degradation by employees to person and denial of services such as suites and rooms solely based on race could be raised as violation.

III. STATEMENT OF CLAIM

1. An African-American disabled Hilton Diamond Members family of Elderly Wade Pyatt, Roberta Pyatt (wife), Wadena Pyatt (daughter) and Liltisha Pyatt (daughter) were attacked by Hilton Hotel Managers and staff at Hilton Homewood Suites, in Plainview, New York and Hilton Hampton Inn, in Islandia, New York with racial slurs, racial bias and disability discrimination, physical assault, invasion of privacy, multiple injuries, financial abuses, breach of contract and retaliation that became one of the worst cases to ever occur through hotels in Suffolk County, New York.
2. The racial and disability discrimination disputes between the parties were ongoing from about mid 2019 during the start of the COVID pandemic until 2024, especially over the requested refund of the Pyatt families' monies paid thereafter experiencing racial and disability discrimination with harassment and retaliation through the Hilton Hotels that was denied.
3. Even after Hilton Corporate office had directed Hilton Homewood Suites and Hilton Hampton Inn, of Long Island, NY to resolve the matter with the Pyatt family, especially with contract disputes of short-term/long term stay pertaining to racial and disability discrimination, monies paid and make disability accommodations.
4. The properties continued to discriminate with Hilton Homewood Suites rejecting to allow the Pyatt family to return back to their property for disability

accommodation of a handicap accessible suit for racial discriminatory reasons of claims that the Pyatt family as African Americans and their kind that look like they were from the hood, was not the right image for their hotel that was ongoing until and or about October 2022.

5. According to a white Assistant Manager of the Hilton Homewood Suites, the Pyatt's looked like a black family from the hood who receives assistance through welfare and their kind wasn't the right image for this hotel.
6. The Pyatt family who entered into contract with the Hilton Homewood Suites, of Plainview, NY (Melville Location), by meeting with their Sales Manager and making payments for short-term/long-term stay by debit/credit card and cash, towards the monthly amount quoted, were asked to leave based off of their race and the Assistant Manager and Hotel Owner saying that the Pyatt's look like a Black family from the hood who receives welfare and their kind was not the right image for this particular Hilton Hotel. If the Pyatt's did not leave the property, then the police would be called.
7. The Pyatt family were also denied a Handicap accessible suite on the 1st floor of the Hilton Homewood Suites by a white Assistant Manager through consent of the Hotel Owner because of their race. Where the white Manager stated he had to hide this black family on a top floor so the hotel wouldn't lose guest.

8. Additionally, the Pyatt family were denied a handicap accessible suit entirely because of racial discrimination by the Hilton Homewood Suites until October 2022.
9. The white Assistant Manager was the one who called over to the Hilton Hampton Inn, of Islandia, NY without the Pyatt's consent to transfer the short-term/long term stay contract to this hotel, when the white Manager was aware that the Hilton Hampton Inn was under construction.
10. Where moving a disabled family based on race to another hotel was inappropriate, dangerous and done for racial discriminatory reasons .
11. The two Hilton hotel properties refused to refund the Pyatt family back their monies paid of **\$150,000** for breach of contract, due to racial and disability discriminatory actions taken by them. While threatening the Pyatt family not to call either hotel or stop by to speak with Managers anymore about a refund or the police will be called.
12. According to the Hilton Corporate Office, the hotel properties were responsible for the full refund of the Pyatt family monies paid, since racial and disability discrimination had occurred, with the properties having insurance for the injuries that also occurred. Where Hilton Brands has a zero-tolerance of racial discrimination with a 100 % guarantee full refund of all monies paid if a guest experienced racial discrimination.

13. However, the Hilton Homewood Suites and Hilton Hampton Inn property owners still refused to refund the Pyatt family back their monies or pay anything for the injuries caused. Yet, the hotel property management and Owners had offered monies to everyone else, including criminals, to harass the Pyatt family.
14. The Suffolk County, New York Police Commissioner had met with Wade Pyatt and family to let them know that they have a right to walk into any public place in Suffolk County and be treated equally with the same privileges as any other person. No employee has the right to discriminate against anyone or harassment and deny the Pyatt family of protected privileges under the United States Constitution. The Suffolk County Police Commissioner and Detectives also informed the Pyatt family that if the harassment continues through Hilton hotels, then the Pyatt family should contact the Suffolk County Police Department to file a report immediately as what was done.
15. Where Jessica Torres, a Hispanic Female Hilton Hotel Manager for both properties of Hilton Hampton Inn and Hilton Homewood Suites (*with known criminal history of harassing others and drug related charges*) was arrested on July 10th, 2021, at Hilton Hampton Inn, of Islandia, NY, for harassing with retaliation for racial and discriminatory reasons against the Pyatt family.
16. While Ms. Torres denied the family a handicap accessible room on the 1st floor based off racial discrimination. But placed the family in the worst room on the 4th

floor that was under construction at the time with stating she was hiding the Pyatt family “black a..,” and doing so to force these “ni---,” to leave with refusing to refund their money back.

17. The hotel staff used numerous racial names calling towards the Pyatt family, especially calling them “black ni---,” that was also revealed to SCPD Detectives during investigations. This type of behavior was ongoing until and or about October 2022. The Pyatt family remained in contract dispute with both Hilton Hotel properties over racial and disability discrimination with harassment and retaliation.
18. The records of both Hilton Homewood Suites and Hilton Hampton Inn will indicate and show that the two properties had intentionally placed the Pyatt’s of an African American Disabled family on the 3 & 4th floors of their properties knowingly with intent to segregate them and negligently with disregard to their disabilities.
19. Where the property managers used such discriminatory violations to force the Pyatt family to also leave their hotels, including misuse of the local housing court.
20. Hilton Homewood Suites denied the Pyatt family the right to stay at their hotel based off racial bias and handicap accessible suite for short term/long term contract that had been breached because of racial discriminatory reasons and then transferred the contract to the Hilton Hampton Inn that was under construction at the time for extreme racial reasons.

21. The Pyatt family never received the requested full refund of monies paid to these two Hilton hotels that engaged in racial and disability discrimination against the family with harassment and retaliation.
22. However, a traveling baseball team with majority of white family members had to step in during a power blackout at Hilton Hampton Inn and or around July 2021 right before the Hilton Hotel Manager had been arrested for harassing the Pyatt family, to stop the Management for their racism and disability discrimination against the Pyatt family, when there were also nonworking elevators to even go on the 4th floor.
23. During this time, the Pyatt family had to sit outside of Hilton Hampton Inn and sleep on the bench because of them having disabilities with the hotel still refusing to refund the Pyatt's monies so they could go stay someplace else, including Ms. Pyatt being legally blind and her husband also being unable to walk up flights of stairs to the 4th floor in the dark of the hotel and or be in the heat without air.
24. The white baseball team members and family called Hilton Corporate office to complain about the racial abuses and disability discriminations occurring against the Pyatt family through the Hilton Hampton Inn.
25. In fact, the white families also requested for the Pyatt family to be transferred during this time to another Hilton Hotel location such as the Hilton Homewood Suites that was near by that had available handicap accessible suites and or rooms.

26. Ms. Young, Assistant Manager of Hilton Hampton Inn, continued to deny the Pyatt family this right and telling the Pyatt family that Management already had made the telephone call and the hotel said no. You already know that the Hilton Homewood Suites, in Plainview, NY won't accept your kind, said Ms. Young.
27. The white families of the baseball team then decided to checkout of a handicapped accessible room on the 1st floor at the Hilton Hampton Inn, to allow the Pyatt family to check into this room.
28. Thereafter Hilton Corporate office had received so many complaints from white hotel guest, the Hilton Management LLC representative had override both Ms. Young and Ms. Torres by placing the Pyatt family into the handicap accessible room on the 1st floor at the Hilton Hampton Inn.
29. At the request of the baseball team family members who were white and stood up to fight for the Pyatt family. The white families stated that they won't stay at this location anymore if such abuses occur towards elders with disabilities and or anyone based off their race.
30. This had made Ms. Torres very upset at Hilton Management about moving the Pyatt family to a handicap accessible room on the 1st floort at the Hilton Hampton Inn.
31. Ms. Torres then waited until representatives of Hilton Management had left the Hilton Hampton Inn property after the power blackout, so she could harass the Pyatt family to move out of the handicap accessible room on the first floor.

37. However, upon Mr. Petix getting released on bail, he then returned to the Hilton Hampton Inn to continue harassing the Pyatt family for Ms. Torres, Ms. Young and Hilton Hampton Inn/Grand Prix Lessee Management/Hotel Owners.
38. In particular, Mr. Petix and his associates were attacking Ms. Pyatt for filing complaints against Management. Mr. Petix with his wife then called the police when the order protection was in place to protect Wadena Pyatt and her family.
39. SCPD Highway Patrol arrived to the Hilton Hampton Inn from the 4th precent and started talking rudely to Ms. Pyatt of whom just came back from shopping for her family.
40. Ms. Pyatt then called the SCPD 4th Precent to request to speak with the Lieutenant. The Lieutenant of the precent on duty at the time had spoken with Ms. Pyatt and told her and former male caregiver of Mr. Pyatt to come down to the precent to meet with him about his police officer behaviors and about the order of protection violation of Mr. Petix who had been released on bail from jail.
41. Upon Ms. Pyatt and male associate getting out of the car at the police precent, the same officers had stopped the two from going into the police station to meet with the Lieutenant.
42. A police brutality occurred during this time and was being investigated by the New York State Attorney General's office because of the same officers had complaints filed against them for other incidents of police brutality, with the false arrest being dropped against Ms. Pyatt's associate.

43. Even the Pyatt family service dog was also being attacked. Where the Hilton Hampton Inn had denied the Pyatt family the right for their service dog to enter the main lobby of the hotels during breakfast and dinner servings.
44. Where the hotel managers were aware of the Pyatt families' disabilities, including of Roberta Pyatt being legally blind. The Pyatt family suffered but again stayed and stood up for their rights.
45. The Pyatt family really suffered, including Ms. Pyatt still having an ankle injury from Ms. Torres having her drug using associate with a large German Shepherd dog attack Ms. Pyatt and their family small service dog while entering the elevator of the Hilton Hampton Inn.
46. Where this white male continued with cursing and attempting to use intimidation towards Ms. Pyatt because of Ms. Torres thereafter injuring her and police report was also filed. The same as other criminals from the Central Islip, NY area had done who were affiliated with Ms. Torres.
47. An order of protection was issued for the Pyatt family through the Suffolk County 1st District Court against Ms. Torres, Hilton Hotel Manager, thereafter she had been arrested on July 10th, 2021 and her associate of Louis Petix, a white male (*with known criminal history of harassing others and hired by the Hilton Hotel Managers and Owners of the hotels to harass the Pyatt family*) whom was arrested on October 28th, 2021 as well ,with order of protection extended until and or around May 2024.

48. Louis Petix was arrested 3 times for harassing the Pyatt family, held in contempt of court for violating the order of protections and then pleaded guilty to the charges pertaining to this case.
49. The ongoing racial and disability discrimination with harassment, fraud and retaliation continued to escalate against the Pyatt family by the two Hilton hotel properties, their Owners, Management, staff and affiliated/hired criminal associates, thereafter the Pyatt family had filed complaints through *Hilton Worldwide Holdings Inc Corporate Office and numerous government agencies, including Suffolk County Police Department*.
50. Over the two hotels **breaching contract** of extended stay with the Pyatt family for handicap accessible hotel suite/rooms for discriminatory reasons. While also refusing to refund the Pyatt family back **\$150,000 dollars of their monies paid** in accordance with Hilton Worldwide Holdings corporate office informing the Pyatt family that Hilton Brands has a zero-tolerance policy for racial or disability discrimination with a 100% guarantee of monies back for the stay.
51. The Hilton Brands Corporate office did agree with the Pyatt family that their contract should not had been transferred from the Hilton Homewood Suites to the Hilton Hampton Inn because of racial discrimination, especially removing a disabled family out of a handicap accessible suite based off race and then sending them to another hotel.

52. However, the Pyatt family was still denied the right to return back to the Hilton Homewood suites until October 2022 based off racial discrimination and property owners standing on their grounds that the Pyatt family, of African American and their kind was not allowed to stay at their hotel.
53. Again, the Pyatt family stood to fight for their rights given to them in accordance with the US Constitution and New York State Human Rights Law.
54. Even though the defendants celebrated for causing the Pyatt family financial, medical hardship, pain, distress, and suffering, as staff continued to laugh in the Pyatt family faces with remarks made about winning while discriminating and mocking of our legal system, including denying the Pyatt family their request for full refund of monies paid until 2024. While still not refunding the Pyatt's back their monies .
55. While threatening the Pyatt family not to contact or come back to the Managers of Hilton Homewood Suites and Hilton Hampton Inn to request their monies back anymore, including telling the Pyatt family that their black as.., were banned from all Hilton Brands even though they are Hilton Diamond members.
56. Kaitlyn Young, a white female Assistant Manager of Hilton Hampton Inn continued to support what her friend of Ms. Torres, Hispanic Hilton Manager for both properties of what she had done and another white male Assistant Manager of Hilton Homewood Suites by stating that the hotel were hiding the Pyatt family on the 4th floor and denied the Pyatt family a handicap accessible room on the 1st floor for racial reasons.

57. Room #414 was one of the worst at Hilton Hampton Inn that was under construction with extreme safety hazards that were done intentionally and used to harass/retaliate against the Pyatt family to force them to leave voluntarily without a refund of their monies back.
58. Where multiple injuries occurred that were all documented about the Pyatt family who were forced on the 3rd and 4th floors in non-handicap accessible rooms, including of head concussion and front teeth knocked out because Elderly Pyatt was trying to utilize a broken tub that wasn't handicap accessible either.
59. The Pyatt family were forced to remain in this unsafe room on the 4th floor of the Hilton Hampton Inn for racial discriminatory and retaliatory reasons until October 2022, when this matter could have been resolved in July 2021.
60. In July 2021, thereafter Ms. Torres, Hilton Manager had been arrested for harassing the Pyatt family at the Hilton Hampton Inn, the Hilton Hotel Management LLC representatives had requested to meet with the Pyatt family about settlement.
61. The Pyatt family had met with Hilton Hotel Management representatives of whom asked what the Pyatt would take to settle the matter. The representatives also offered to give the Pyatt family money that would be more than the \$150,000 the Pyatt family had paid and requested a refund back, plus assisting with helping the family obtain a house in Alabama.

62. As the Pyatt family were planning to do originally, if the racial and disability disputes did not occur through the Hilton Hotels and caused injuries to the family with setbacks.
63. The Hilton Hotel Management LLC representatives also informed the Pyatt family that each hotel has insurance that can assist with any medical expenses and or compensation for the injuries that occurred on their hotel properties to the Pyatt family.
64. However, the Hilton Hotel Management LLC representatives had told the Pyatt family to think things over because they also have the right to obtain an attorney to represent them about settlement.
65. The Pyatt family agreed to settle for an agreed upon amount, including the assistance offered by Hilton to help with the Pyatt family relocation from New York to Alabama ,with finding a house and any necessary medical expenses for injuries occurred on the hotel properties.
66. After speaking with the Hilton Management representatives, the Pyatt family had retained the attorneys of Salomon and Beaz and Napoli and Shkolnik Law Firms to represent them about settlement and filing complaints through the Supreme Court and US District Court.
67. The attorneys retained by the Pyatt family were in settlement discussions with the Hilton Hotels, Management and their attorneys, including asking the Pyatt family would they be satisfied with a 5-million-dollar settlement.

68. However, the Pyatt family didn't hear anything else about settlement, while so much time had been delayed with the defendants turning up the harassment with retaliation against the Pyatt family.
69. The complaints were never filed on behalf of the Pyatt family, but instead the Hilton Hampton Inn and Grand Prix Lessee had filed a frivolous personal injury claim and injunctive relief motion without suing for any damages that were dismissed by the Supreme Court on March 15th, 2022.
70. The Pyatt family reached out to everyone, including the Hilton Brands Corporate Office, begging them to please step in to stop the Hilton Hampton Inn and Hilton Homewood Suites Management and staff from harassing and retaliating against the Pyatt family by hiring criminals to cause more injuries.
71. The Hilton Corporate Office said there was nothing they could do at this time because it's been referred to the hotels to handle directly.
72. In fact, Hilton Corporate Office also started to ignore the Pyatt family calls and written complaints right before Elderly/disabled Wade Pyatt, as an African American man and Hilton Diamond member was left for dead like a stray dog on the main lobby floor of the Hilton Hampton Inn, of Islandia, NY on March 17th, 2022.
73. On March 17th, 2022, the harassment, intentional negligence, abuse and retaliation continued to escalate upon the Hilton Hampton Inn and Grand Prix Lessee receiving

the Suffolk County Supreme Court decision to deny their injunctive relief against the Pyatt family and dismissing their personal injury action on March 15th, 2022.

74. Kaitlyn Young, an Assistant Manager of Hilton Hampton Inn, intentional negligence and retaliation of her instruction on March 17th, 2022, for her staff not to call 911 and EMT when Wade Pyatt suffered a head injury was an act of being malicious and reckless.
75. However, an African American staff member of the hotel came over to Wade Pyatt while he was on the Hilton Hampton Inn lobby hotel floor and called Wadena Pyatt to speak with him before her father had lost consciousness.
76. The staff was very upset that Ms. Young was still requesting for the staff to leave Mr. Pyatt on the floor for dead like a stray dog.
77. The staff member disregarded Ms. Young directives by helping Mr. Pyatt and requested for the front desk staff to call 911 for emergency assistance while Ms. Pyatt was still on the telephone.
78. Mr. Pyatt was then transported to a local hospital and ended up in brain ICU in critical condition. Where Mr. Pyatt had a stroke from the brain injury, multiple surgeries, developed seizures, unable to walk, vision, speech, neology and other health issues, including arm fracture with more while still currently receiving rehabilitation.

79. The Pyatt family suffered many injuries and losses because of the discrimination, harassment and retaliation that was done intentionally through the Hilton Hotels with both Wade Pyatt and Roberta Pyatt still undergoing medical treatments. Where the Hilton Hotels still refused to refund the Pyatt family monies paid to them.
80. Injunctive Relief is also being requested because the Defendants have already caused injuries to the Plaintiffs who suffered irreparable harm, including hardships. The court can see with the attached exhibit (a) photo of Wade Pyatt of whom was left for dead on the Hilton Hampton Inn Hotel lobby floor intentionally and almost died while being in a brain ICU in critical condition. Mr. Pyatt, of the Plaintiff is still under medical treatment from multiple irreparable injuries caused by the defendants and in no condition for any further harassment because the Plaintiffs are filing a federal civil complaint. The Plaintiffs can't take any further harm through injuries. The defendants in this case had also hired criminals to harass the Plaintiffs in the past, where arrest were made and order of protection issued through Suffolk County 1st District Criminal Court, including Defendants damaging Plaintiffs properties with using intimidation and harassment to harm the Plaintiffs physically. Currently, the Defendants still have one employee with criminal background working at the Hilton Homewood Suites, in Plainview, NY and very dangerous of whom also hired her criminal associates to harass the Plaintiffs in retaliation to the criminal matters that occurred in the past pertaining to this case and complaints filed with government agencies. The Plaintiffs medically are in no condition for any further harm or injuries caused by the Defendants harassment and where multiple arrest were made of the Defendants and associates in the past pertaining to this matter.

81. Plaintiff respectfully requests that this Court enter an order (a) to protect Plaintiffs with disabilities and permanent injuries caused by the Defendant from permanently engaging in the harassing conduct described herein and (b) awarding Plaintiff such other and further relief as this Court deems just and equitable.
82. Plaintiff repeat and re-alleged the foregoing as if fully set forth herein.
83. The Pyatt family was offered short-term/long term extended stay suites/room for rent by the Defendants to Plaintiffs through contract.
84. Plaintiffs accepted that offer and paid using debit/credit card and cash.
85. Upon the Defendants deciding that they did not want an African American family staying at their hotels, the Defendants refused to honor their contract with Plaintiffs.
86. By discriminating against Plaintiffs on the basis of their race and disability with segregation, harassment, fraud and retaliation.
87. Defendants have denied Plaintiff, the same rights to enjoy the benefits, privileges, terms, and conditions of contracts as is, as was, enjoyed by non-black citizens, in violation of Plaintiff's rights.
88. Defendants denied Plaintiff's their rights under all the federal laws in question for this complaint, including discriminating against the Pyatt family because of their disabilities.

89. As a result of Defendants' conduct, Plaintiffs have been damaged in an amount for compensatory to be determined through jury trial, but not less than \$700 million, for the emotional distress, pain and suffering, and other harms caused by Defendant's discriminatory conduct.

90. As a result for the Defendants' conduct, the Plaintiff is requesting punitive damages in an amount to be determined through jury trial, but not less than \$700 million, to punish Defendants for their malicious and reckless conduct and all other relief that the court finds just and proper.

IV PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that the court grant the following relief:

- (1) Award compensatory damages to Plaintiffs in an amount to be determined by a jury, but not less than \$700 million that would fully compensate Plaintiffs for economic loss, humiliation, embarrassment, medical expenses, pain, suffering, mental anguish, emotional distress and all injuries of harm.
- (2) Award punitive damages to Plaintiff in an amount to be determined by the jury, but not less than \$700 million that would punish the Defendants for the conduct alleged herein and that would effectively deter similar conduct in the future;

- (3) Award Plaintiffs their reasonable attorneys fees and costs pursuant to the appropriate law.
- (4) Injunctive Relief is also being requested because the Defendants have already caused injuries to the Plaintiffs who suffered irreparable harm, including hardships. The court can see with the attached exhibit (a) photo of Wade Pyatt of whom was left for dead on the Hilton Hampton Inn Hotel lobby floor intentionally and almost died while being in a brain ICU in critical condition. Mr. Pyatt, of the Plaintiff is still under medical treatment from multiple irreparable injuries caused by the defendants and in no condition for any further harassment because the Plaintiffs are filing a federal civil complaint. The Plaintiffs can't take any further harm through injuries. The defendants in this case had also hired criminals to harass the Plaintiffs in the past, where arrests were made and order of protection issued through Suffolk County 1st District Criminal Court, including Defendants damaging Plaintiffs properties with using intimidation and harassment to harm the Plaintiffs physically. Currently, the Defendants still have one employee with a criminal background working at the Hilton Homewood Suites, in Plainview, NY and very dangerous of whom also hired her criminal associates to harass the Plaintiffs in retaliation to the criminal matters that occurred in the past pertaining to this case and complaints filed with government agencies. The Plaintiffs medically are in no condition for any further harm or injuries caused by the Defendants harassment and where multiple arrests were made of the Defendants and associates in the past pertaining to this matter.

- (5) Plaintiff respectfully requests that this Court enter an order (a) to protect Plaintiffs with disabilities and permanent injuries caused by the Defendant from permanently engaging in the harassing conduct described herein and (b) awarding Plaintiff such other and further relief as this Court deems just and equitable.
- (6) Order such other relief as the Court deems just and equitable.

JURY TRIAL DEMAND

V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

- (A) I agree to provide the Clerk's Offices with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 17th, 2025.

Signature of Plaintiffs: Wade Pyatt

Printed Name of Plaintiff: Wade Pyatt

Signature of Plaintiff: Roberta Pyatt

Printed Name of Plaintiff: Roberta Pyatt

Signature of Plaintiff: Wadena Pyatt

Printed Name of Plaintiff: Wadena Pyatt

Signature of Plaintiff: Liltesha Pyatt

Printed Name of Plaintiff: Liltesha Pyatt

**Reserve the right to amend.*