

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF RENSSELAER

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Sadie Schreiner	: Index No.
Plaintiff,	:
	:
	Plaintiff designates
	RENSSELAER COUNTY
	as place of trial
-against-	:
Renssalaer Polytechnic Institute	:
	<u>SUMMONS</u>
	The basis of the venue is the
	operative facts having taken
	place in Rensselaer County.
Defendant.	:
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YOU ARE HEREBY SUMMONED to answer the Complaint this action and to serve a copy of your answer, or, if the Complaint is not served with this Summons, to serve a notice of appearance, on the Plaintiff's attorney within 20 days after the service of his 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 inconvenience relief demanded in the Complaint.

Dated: November 7, 2025

New York, New York

CIRILLI, LLC

By: 
 Susan M. Cirilli, Esq.
 Cirilli, LLC
 100 Church Street, Suite 800
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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF RENSSELAER

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Sadie Schreiner	:	Index No.
Plaintiff,	:	
	:	Plaintiff designates
	:	RENSSELAER COUNTY
	:	as place of trial
-against-	:	<u>COMPLAINT</u>
Renssalaer Polytechnic Institute	:	The basis of the venue is the
	:	operative facts having taken
	:	place in Rensselaer County.
Defendant.	:	
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Plaintiff, Sadie Schreiner (“Plaintiff” or “Sadie”), by and through her counsel, Cirilli, LLC, and by way of Complaint against Defendant, Rensselaer Polytechnic Institute (“RPI” or “Defendant”), allege and state as follows:

INTRODUCTION

1. Sadie Schreiner is a woman who loves to run competitively. In March of 2025, she signed up to run for the women’s 200 meter and 400 meter races held at the RPI Under the Lights Invitational (“Track Meet” or “Under the Lights Track Meet”). Sadie signed up as an athlete unattached to any University or club and qualified to participate based upon her past official race times for those distances to compete in the RPI Track Meet.

2. The RPI Track Meet is open to members of the public to participate, so long as their times qualify for the competition. On April 8, 2025, Sadie registered for the events just like any other member of the public, through the website Direct Athletics.

3. The next day, Sadie received an e-mail correspondence from RPI through their general counsel. RPI chose to disregard state law that identifies gender identity as a protected status. RPI proceeded to discriminate against Sadie citing Executive Order 14201 and their fear

of the Department of Education. RPI through its General Counsel told Sadie that she is not permitted to run in the Track Meet citing the Executive Order 14201 “Keeping Men out of Women’s Sports” (hereinafter “Executive Order”). The General Counsel went on to express his fear of the Department of Education. “The U.S. Department of Education has, through communication and action, indicated that it intends to vigorously enforce this Executive Order under Title IX...” He then explicitly told Sadie that “RPI cannot accommodate your request to compete at this meet.”

PARTIES

Plaintiff, Sadie Schreiner

4. Plaintiff Sadie Schreiner is an individual residing in New Jersey.

5. Even before entering high school, Sadie participated both as a student athlete running in sanctioned intercollegiate and other races as an athlete attached to a named school and in international meets as a qualified “unattached” runner based on her recorded times in prior events.

6. During her high school years, Sadie followed her biological needs and transitioned to womanhood with the full support of her family and continued to compete as a short distance runner through high school and thereafter at the Rochester Institute of Technology (“RIT”), an NCAA Division III institution.

Defendant, Rensselaer Polytechnic Institute

7. Defendant, Rensselaer Polytechnic Institute (“RPI”) is an educational institution located at 110 8th Street, Troy, New York.

JURISDICTION AND VENUE

8. This Court has jurisdiction over the action pursuant to Civil Practice Law and Rules (“CPLR”) §§301 and 302.

9. Venue is proper pursuant to CPLR 503(a) because a substantial part of the events or omissions giving rise to Plaintiff’s claims took place in Rensselaer County.

FACTUAL ALLEGATIONS

1. At all times relevant to the present Complaint, Sadie Schreiner was a transgender woman whose birth certificate, Social Security Card and Driver’s license confirm that she is a female individual.

2. RPI hosted and managed the “RPI Under the Lights” meet on April 10 and 11, 2025 (“Track Meet”).

3. Individuals competed in the Track Meet as student-athletes representing their college or university.

4. Individuals who did not represent a college or university were also allowed to register and compete in the Under the Lights Track Meet as individuals representing themselves or a recreational or a professional track club. By the published records and results of the Under the Lights Track Meet, runners not registered with a college or university registered and were listed as “Unattached” or with their track club.

5. There is a popular website whereby individuals from the public can register for the track meets and races as Unattached. This website is directathletics.com (hereinafter “Direct Athletics”).

6. Direct Athletics includes links to various meets where attached and unattached athletes including these athletes wishing to participate in the Under the Lights Track Meet could secure information needed to register for track meets across the country.

7. The RPI Under the Lights Track Meet was listed as a race on Direct Athletics.
8. Members of the public could obtain information on how to register for the RPI Under the Lights Track Meet Invitational from the website.
9. On April 8, 2025, Sadie registered for the 400 meter and 200 meter women's races at the Track Meet, through Direct Athletics. Sadie remitted \$44.00 to register for the 400 meter and 200 meter women's races at the Track Meet, through Direct Athletics.
10. On April 9, 2025, Sadie received an e-mail correspondence from the General Counsel of RPI, with Dr. Kristie Bowers copied:

I understand that you have expressed interest in competing in women's events at the upcoming track meet, RPI Under the Lights Invite. As a result of Executive Order 14201, issued on February 5, 2025, U.S. educational institutions are not permitted to allow transgender women to participate in women's athletics events. This Executive Order is not limited to NCAA competition. The U.S. Department of Education has, through communication and action, indicated that it intends to vigorously enforce this Executive Order under Title IX of the Educational Amendments of 1972. Therefore, RPI cannot accommodate your request to compete at this meet. I understand this is not the outcome you were seeking and wish you the best.

11. The General Counsel never asked Sadie her sex or gender prior to sending the e-mail correspondence.
12. RPI Athletic Director, Dr. Kristie Bowers never asked Sadie her sex or gender.
13. Upon reasonable information, knowledge and belief, approximately 11 individuals raced in the Track Meet that were not affiliated with any university or college.

**COUNT I
DISCRIMINATION BASED ON GENDER IDENTITY
EQUALITY OF OPPORTUNITY- PUBLIC ACCOMMODATIONS
COMPLAINANT VS. RPI
NY EXEC. §296(2)(a)**

14. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

15. The RPI Under the Lights Track Meet is a public accommodation as defined by New York State Law . NY Exec. §292(9).

16. Gender identity or expression is a protected status under New York State Law. NY Exec. §292(35).

17. “Gender identity or expression” under the NY Executive Law means “a person’s actual or perceived gender-related identity appearance, behavior, expression, or other gender-related characteristic regardless of the sex assigned to that person at birth including, but not limited to, the status of being transgender.” NY. Exec. §292(35).

18. In New York, it is a Civil Right to use a place of public accommodation without discrimination because of gender identity or expression.

19. It is simply unlawful discrimination for an owner of any “person, owner...manager...agent or employee of any place of public accommodation, resort or amusement, because of...gender-identity or expression...directly or indirectly to refuse, withhold from or deny such person any of the accommodations, advantages, facilities or privileges thereof...” NY Exec. §296(2)(a).

20. Moreover it is also unlawful for any “person, owner...manager...agent or employee of any place of public accommodation resort or amusement...[to take the position that] the patronage or custom thereat of any person of or purporting to be of any particular...gender identity or expression...is unwelcome, objectionable or not acceptable, desire or solicited.” NY Exec. §296(s).

21. Upon information and belief, at all times applicable to the present matter, Defendants were aware that Sadie was a transgender woman and maliciously, willfully, and recklessly discriminated against Sadie Schreiner on the basis of her gender identity and expression.

22. Defendant, RPI, discriminated against Sadie when they individually and collectively prohibited Sadie from competing in the women's 200 and 400 meter race on account of her gender identity and expression.

23. Plaintiff suffered and continues to suffer great emotional harm as a direct result of RPI's actions.

24. Accordingly, Defendant discriminated against Plaintiff on the basis of gender identity in violation of the New York Human Rights Law.

25. As a result of Defendants' violations of Plaintiff's statutory rights, Plaintiff has been damaged in an amount to be determined at trial.

COUNT II
FOR DISCRIMINATION UNDER STATE LAW
NEW YORK EXECUTIVE LAW §296(4)
PLAINTIFF V. RPI

26. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

27. RPI is an "educational institution."

28. It is an unlawful practice for an "educational institution to deny the use of its facilities to any person otherwise qualified, by reason of gender identity or expression..." NY Exec. §296.

29. Defendant denied Sadie use of the facilities that other members of the public were able to enjoy and access.

30. Accordingly, Defendant discriminated against Plaintiff on the basis of gender identity in violation of the New York Human Rights Law.

31. As a result of Defendant's violations of Plaintiff's statutory rights, Plaintiff has been damaged in an amount to be determined at trial.

COUNT III
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
PLAINTIFF V. DEFENDANT

32. Plaintiff repeats, reiterates and incorporates the averments contained in the preceding paragraphs as if fully set forth herein.

33. Defendant acted intentionally when they excluded Sadie from the women's 200 and 400 meter races.

34. Defendant's individual and collective action was extreme and outrageous.

35. Defendant acted with the intent to cause severe emotional distress in Sadie.

36. Defendant acted with a disregard of the substantial probability of causing severe emotional distress.

37. The Defendant's actions caused Sadie severe emotional distress.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that judgment be granted:

- a) Declaring Defendant's conduct complained herein to be a violation of Plaintiff's rights under New York State law and its regulations.
- b) Awarding Plaintiff punitive damages against all defendants.
- c) Awarding Plaintiff liquidated damages.
- d) Awarding Plaintiff emotional distress damages.
- e) Awarding Plaintiff the costs of this action together with reasonable attorneys' fees, and;

f) Awarding such and further relief as this Court deems necessary and proper.

CIRILLI, LLC



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ATTORNEY'S VERIFICATION**STATE OF NEW YORK, COUNTY OF NEW YORK**

I, the undersigned, an attorney admitted to the practice in the Courts of the State of New York, certify that I am the attorney for the plaintiff, **SADIE SCHREINER**, in the within action; I have read the foregoing **COMPLAINT** in the within action and know the contents thereof; the same are true to my own knowledge, except as to the matter herein stated to be alleged on information and belief, and as to those matters, I believe them to be true. The reason this verification is made by me and not by plaintiff, is that the said plaintiff does not reside in the County where Cirilli, LLC maintains its primary office.

My belief as to those matters therein not stated upon knowledge is based upon facts, records, and other pertinent information contained in files.

Dated: November 7, 2025

New York, New York



Susan M. Cirilli, Esq.

JURY DEMAND

Plaintiff requests a jury trial on all issues to be tried.

Dated: November 7, 2025
New York, New York

CIRILLI, LLC



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