

IN THE MATTER OF THE CLAIM OF

THOMAS G. DONLON

AGAINST

CITY OF NEW YORK, ERIC ADAMS and TARIK SHEPPARD

TO: COMPTROLLER OF THE CITY OF NEW YORK  
Municipal Building, New York, NY 10007

CORPORATION COUNSEL OF THE CITY OF NEW YORK  
The City of New York, 100 Church Street  
New York, NY 10007

**1. The name and Post-Office address of each claimant and claimant's attorney is:**

Thomas G. Donlon  
90 Broad Street, 10th Floor  
New York, NY 10004

Law Office of John A. Scola, PLLC  
90 Broad Street, 10th Floor  
New York, NY 10004

**2. The Nature of the Claim:**

This Notice of Claim is brought for defamation (including both slander and libel), negligence, constitutional violations, common law claims, and retaliation. These claims arise from knowingly false, malicious, and reputationally damaging public statements made by Respondents Tarik Sheppard and Eric Adams concerning Claimant Thomas G. Donlon, the former Interim Police Commissioner of the NYPD. The statements were made in direct response to Mr. Donlon's protected whistleblower activity and federal civil rights lawsuit, and they caused substantial reputational, emotional, and professional harm.

**3. The time when, the place where and the manner in which the claim arose:**

On July 16, 2025, during a televised appearance on PIX11 News, former NYPD Chief Spokesperson Tarik Sheppard—no longer employed by the City at the time—falsely stated:

“I think Commissioner Donlon was isolated when he walked in and his phones were taken by the FBI. That created extreme trust issues, and he was showing many signs of cognitive issues and not making decisions.”

Every part of that statement is false. Mr. Donlon's phones were never taken by the FBI. He was not “isolated” upon becoming Commissioner. There is no documentation, no eyewitness, and no internal record suggesting otherwise. The claim that he exhibited “many signs of cognitive issues” or was unable to make decisions is equally fabricated.

Throughout his tenure, Mr. Donlon remained capable, communicative, and fully engaged. Sheppard's knowingly false statements—made in his personal capacity—were part of a deliberate effort to discredit Mr. Donlon in retaliation for his federal civil RICO and civil rights lawsuit.

Sheppard went even further—mocking Mr. Donlon by stating he should “get yourself some help and go into retirement in peace.” He admitted on air that he had not read the lawsuit, dismissed it as the work of a “disgruntled employee,” and suggested that the City, “overwhelmed with lawsuits,” would likely just settle.

He then added, without irony: “Now is not the time to hurl criminal accusations or serious allegations at people”—even as he spread knowingly false and defamatory claims about Mr. Donlon's mental fitness, credibility, and performance.

In a stunning admission, Sheppard openly revealed that Mr. Donlon was appointed not to lead with integrity—but to serve as window dressing. He described the rationale behind Donlon's appointment as a calculated effort by Mayor Adams to create the optic of independent oversight, rather than a genuine attempt to reform the NYPD. Sheppard attributed this directly to the Mayor:

“In terms of dealing with criminality, the Mayor specifically brought in Commissioner Donlon because he was an outsider, and he wanted to give the optic that an outsider's coming in... and I (Mayor Adams) want it to be someone from the feds so that he could take an honest look and not from within. And he disappointed the Mayor in that way.”

He added:

“It would make no sense, when you're trying to create a criminal enterprise, to bring in a complete outsider that nobody knows and give him a fresh look at what we are doing.”

These statements are revealing. As the NYPD's former top spokesperson, Sheppard was articulating the Mayor's own reasoning—making this a de facto admission by the City.

The Mayor knew Mr. Donlon was an outsider, selected for his independence and federal law enforcement background, and was disappointed when Donlon refused to look the other way. That disappointment became the motive for a coordinated and malicious campaign to discredit him.

The following day, in a July 17, 2025 interview published by AMNY, Sheppard intensified the attack:

“He was a man who was going through some cognitive issues with his memory, he sort of believed that there was this conspiracy against him, and I thought he was suffering some kind of disorder, I honestly did.”

These statements—falsely attributing memory loss, delusions, and mental disorder to Mr. Donlon—were made with actual malice and constitute defamation per se under New York law.

There is no medical basis for any such diagnosis, nor did Sheppard have any qualifications or authority to make one. His goal was not to inform but to humiliate. These remarks were intended to damage Mr. Donlon's credibility as a whistleblower and publicly shame him for exposing internal misconduct.

Separately, upon information and belief, on July 18, 2025, during a closed-door fundraising meeting with the Partnership for New York City, Mayor Eric Adams made nearly identical false claims:

- That Mr. Donlon was “forgetful,” “erratic,” and “mentally not fit” to serve as Commissioner;
- That he had asked Mr. Donlon to undergo a “mental check-up,” and Mr. Donlon “refused,” resulting in his termination;
- That Mr. Donlon was “rapidly deteriorating mentally” and had been fired for refusing help.

According to reporting by the New York Daily News on July 18, Kathy Wylde, President and CEO of the Partnership for New York City, stated that Mayor Adams told attendees:

“He just explained that he had increasingly observed that Donlon's behavior was off and that he was forgetting things. The mayor was advised by a number of people that this problem was going on and so the mayor sat down with him and asked him to see a doctor and get some medical diagnosis and Donlon refused, and he had to let him go.”

These statements were independently corroborated in a July 18, 2025 NY1 news story and a July 19, 2025 tweet by NY1's Bernadette Hogan:

“@NYCMayor said Tom Donlon ‘rapidly deteriorated’ mentally, became ‘irrational & forgetful.’ Said he told Donlon: ‘I want you to go to a doctor, get a medical diagnosis & get treatment.’ Donlon refused, so Adams said he fired him.”

None of this is true. There is no record of any mental health request, no evidence of cognitive decline, and no justification for these remarks.

In fact, following his removal as Commissioner, Mayor Adams appointed Mr. Donlon to serve as Senior Advisor for Public Safety—a role requiring judgment, oversight, and trust. If Adams genuinely believed Mr. Donlon was mentally unfit, assigning him to manage public safety and handle federal grant proposals would have been nothing short of administrative malpractice.

But the record tells a different story: these statements were not made out of concern — they were made to retaliate.

That same day, during a press conference in Inwood, Mayor Adams made additional comments:

“Just interview him for 15 minutes... and then you tell me, what's your impression? What do you observe?”

When pressed on the insinuation, Adams added:

“Listen, I don’t want to be biased.”

These rhetorical games—inviting speculation without directly stating falsehoods—were calculated to create doubt while avoiding accountability.

There is no documentation, medical or otherwise, suggesting Mr. Donlon was impaired or asked to seek treatment. No such concerns were raised until after he filed suit against the Mayor and his inner circle.

These are not policy differences. They are targeted smears designed to destroy a whistleblower’s reputation and silence the truth.

If the Mayor truly believed Mr. Donlon lacked the capacity to lead, appointing him as Senior Advisor for Public Safety would have been reckless and indefensible. Instead, these statements had a clear purpose—but not a lawful or legitimate one. They were made to discredit and silence a whistleblower. Fabricated claims of mental instability were deployed to protect the Mayor and his appointees from the substance of the allegations in the RICO case—claims he has notably refused to address.

Further illustrating the abuse, Tarik Sheppard previously threatened to kill Mr. Donlon in front of multiple witnesses—after learning Donlon might report misconduct within the NYPD. Mr. Donlon reported that threat directly to Mayor Adams. Despite knowing the seriousness of the incident, Mayor Adams refused to discipline Sheppard. Instead of taking corrective action, he kept Sheppard in his inner circle—signaling tolerance, if not approval, of Sheppard’s behavior.

These facts place the subsequent public statements by both Sheppard and Adams in an even more troubling light. Their coordinated efforts to portray Mr. Donlon as mentally unfit were not only false—they followed a credible death threat that Adams knowingly disregarded.

If Sheppard’s recent claims are to be believed, then he threatened to kill a man he believed was mentally impaired. If his claims are false, then he is weaponizing fabricated mental health allegations to justify retaliation.

Either way, his conduct is abusive, vindictive, and deeply troubling. The threat—which is already the subject of legal action—makes his subsequent public attacks even more disturbing and reinforces the sustained campaign of intimidation that Mr. Donlon has faced.

Viewed in the context of Sheppard’s prior death threat—and Adams’s refusal to take action—these statements function as retaliatory warnings aimed at coercing Mr. Donlon into silence.

**Mr. Donlon will not be silenced. He intends to pursue all available legal remedies.**

**The City of New York is hereby instructed to preserve all internal and external communications concerning Thomas Donlon, including—but not limited to—communications by or between Mayor Eric Adams, Tarik Sheppard, and any other current or former City representative or official. This includes communications via text message, email, Signal, WhatsApp, or any other encrypted or disappearing messaging platform.**

**The City and its employees with information relevant to this matter—including the respondents named herein—are hereby instructed to immediately disable and suspend all auto-deleting or expiring message functions on all platforms, including but not limited to Signal. They must take affirmative steps to ensure that no communications are lost, deleted, or altered. This preservation duty extends to all relevant City-issued and personal devices used by the individuals named herein.**

These preservation obligations apply both to this Notice of Claim and to the pending federal action titled *Donlon v. City of New York, et al.*, Case No. 1:25-cv-05831-JHR (S.D.N.Y.). Any failure to comply will be treated as spoliation and addressed accordingly in litigation.

**The items of damage or injury claimed are:**

Claimant seeks monetary and equitable relief, including but not limited to:

- Compensatory damages for reputational injury, economic loss, and emotional distress;
- Punitive damages due to the malicious nature of the statements;
- Attorneys' fees and litigation costs;
- Any further relief deemed just and proper.

Claimant has been damaged in an amount that exceeds the monetary jurisdiction of all lower courts that would otherwise have jurisdiction in an amount of **TEN MILLION DOLLARS (\$10,000,000.00)**.

The undersigned claimant therefore presents this claim for adjustment and payment. You are hereby notified that unless it is adjusted and paid within the time provided by law from the date of the presentation to you, the claimant intends to commence an action on this claim.

Dated:           New York, New York  
                    July 20, 2025

\_\_\_\_\_/s\_\_\_\_\_  
John Scola  
Law Office of John A. Scola, PLLC  
on behalf of the Claimant  
Thomas Donlon  
90 Broad Street, Suite 1023  
New York, New York 10004  
(917) 423-1445

## VERIFICATION

I, Thomas G. Donlon, declare under penalty of perjury that I have read the foregoing Notice of Claim and know the contents thereof. The same is true to my own knowledge, except as to the matters stated to be alleged on information and belief, and as to those matters, I believe them to be true.

Executed on this 20<sup>th</sup> day of July 2025.

\_\_\_\_\_/s/\_\_\_\_\_  
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Thomas G. Donlon