

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

-----X  
TREVLYN HEADLEY,

Answer

Index No. 155228/2025

Plaintiff,

-against-

THE CITY OF NEW YORK; SHATORRA FOSTER, Individually,  
And TANIA KINSELLA, Individually

Defendants'

-----X  
**VERIFIED ANSWER AND COUNTERCLAIMS  
ON BEHALF OF DEFENDANT SHATORRA FOSTER**

Defendant SHATORRA FOSTER ("Defendant"), by and through her attorneys, hereby  
answers the Verified Complaint of Plaintiff TREVLYN HEADLEY ("Plaintiff") as follows:

**GENERAL DENIAL**

Pursuant to CPLR 3015 and 3018, Defendant SHATORRA FOSTER denies each and  
every allegation contained in the Verified Complaint not specifically admitted herein and  
respectfully demands strict proof thereof.

**ANSWER TO ALLEGATIONS**

1. Denies the allegations in Paragraph 1, except admits only that Plaintiff filed this  
action in the Supreme Court of the State of New York, County of New York, and purports to  
assert claims within the statute of limitations period. Defendant denies any implication that the  
claims have merit or are factually or legally sound.

2. Denies knowledge or information sufficient to form a belief as to the truth of the  
allegations contained in Paragraph 2.

3. Denies the allegations in Paragraph 3. Defendant states upon personal knowledge that Plaintiff does not exclusively identify as a lesbian, but has repeatedly stated she is sexually fluid and has dated both men and women.

4. Denies the allegations in Paragraph 4. See response to Paragraph 3.

5. Denies the allegations in Paragraph 5.

6. Admits the allegations in Paragraph 6.

7. Denies the allegation in Paragraph 7 that she was Plaintiff's "lover"; asserts that the relationship was not one of mutual affection but marked by coercion, manipulation, and Plaintiff's exploitation of Defendant's personal and professional connections.

8. Admits the allegations in Paragraph 8.

9. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9.

10. Denies the allegations in Paragraph 10, and denies that the NYPD or its officials took proper remedial action in response to Plaintiff's or Defendant's complaints.

11. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11.

12. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12.

13. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13.

14. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14.

15. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15.

16. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16.

17. Denies the allegations in Paragraph 17. Upon information and belief, Plaintiff's career was not without serious incident, including a 2010 suspension following an out-of-state assault arrest.

18. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 - 26.

19. Denies the allegations in Paragraph 27.

20. Admits the allegations in Paragraph 28.

21. Admits the allegations in Paragraph 29.

22. Denies the allegations in Paragraph 30.

23. Denies the allegations in Paragraph 31, Timothy Pearson is a long-standing family friend and that Plaintiff's claims of departmental conspiracy are unfounded.

24. Denies the allegations in Paragraph 32.

25. Denies the allegations in Paragraph 33.

26. Denies the allegations in Paragraph 34.

27. Denies the allegations in Paragraph 35. Asserts that Plaintiff herself asked Defendant to arrange meetings with Chief Benoit and Alden Foster to facilitate a transfer for her friend, which she followed up with thank-you messages. Defendant possesses copies of those texts.

28. Admits the allegations in Paragraph 36.

29. Denies the allegations in Paragraph 37.

30. Denies the allegations in Paragraph 38. Asserts that Plaintiff initiated the relationship after discovering Defendant's family ties and rank within the department

31. Admits the allegations in Paragraph 39 that a "relationship" existed, but denies it was mutual or healthy; Defendant contends it was exploitative and used by Plaintiff for career gain.

32. Denies the allegations in Paragraph 40.

33. Admits the allegations in Paragraph 41.

34. Denies the allegations in Paragraph 42. Asserts that Plaintiff was upset a MOS was playing with her hair, arguing with defendant the entire event, then deciding to leave.

35. Denies the allegations in Paragraph 43.

36. Denies the allegations in Paragraph 44.

37. Denies the allegations in Paragraph 45.

38. Denies the allegations in Paragraph 46.

39. Denies the allegations in Paragraph 47.

40. Denies the allegations in Paragraph 48. Asserts that Plaintiff insisted upon Defendant sharing her location to keep tabs upon her.

41. Denies the allegations in paragraph 49.

42. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50.

43. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51.

44. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52.

45. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53.

46. Denies the allegations in Paragraph 54.

47. Denies the allegations in Paragraphs 55–59. Asserts that Plaintiff was not fearful for her life and frequently laughed at the messages she now claims were threatening. Plaintiff also boasted to Defendant that she had several ex-girlfriends who attempted suicide or threatened self-harm after their relationships ended with her.

48. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60.

49. Admits the allegations in Paragraph 61. Asserts the Defendant did so to stop Plaintiff from hovering over her.

50. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62.

51. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63.

52. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64.

53. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65

54. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66.

55. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67.

56. Denies the allegations in Paragraph 68. Asserts that Plaintiff still communicated with Defendant for the purposes of engaging her in unwanted sexual contact.

57. Denies the allegations in Paragraph 69. Defendant affirmatively asserts that it was Plaintiff who invited her to hang out on the night in question and then persuaded Defendant to stay over. During the course of the night, Plaintiff initiated non-consensual sexual contact by placing her mouth on Defendant's vulva while simultaneously inserting her finger inside Defendant's vagina. Plaintiff further violated Defendant's bodily autonomy by secretly recording the sexual act without Defendant's knowledge or consent.

58. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70.

59. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71.

60. Denies the allegations in Paragraph 72.

61. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73 - 104.

62. Denies the allegations in Paragraph 105. Asserts that Defendant Reported to the NYPD Internal Affairs Bureau that Plaintiff was stealing time, operating department vehicles while intoxicated, and other related complaints.

63. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 106 – 220.

64. Denies the allegations in Paragraph 221.

- 65. Denies the allegations in Paragraph 222.
- 66. Denies the allegations in Paragraph 223.
- 67. Denies the allegations in Paragraph 224.
- 68. Denies the allegations in Paragraph 225.
- 69. Denies the allegations in Paragraph 226.
- 70. Denies the allegations in Paragraph 227.
- 71. Denies the allegations in Paragraph 228.
- 72. Denies the allegations in Paragraph 229.
- 73. Denies the allegations in Paragraph 230.
- 74. Denies the allegations in Paragraph 231.
- 75. Denies the allegations in Paragraph 232.
- 76. Denies the allegations in Paragraph 233.
- 77. Denies the allegations in Paragraph 234.
- 78. Denies the allegations in Paragraph 235.
- 79. Denies the allegations in Paragraph 236.
- 80. Denies the allegations in Paragraph 237.
- 81. Denies the allegations in Paragraph 238.
- 82. Denies the allegations in Paragraph 239.
- 83. Denies the allegations in Paragraph 240.
- 84. Denies the allegations in Paragraph 241.
- 85. Denies the allegations in Paragraph 242.
- 86. Denies the allegations in Paragraph 243.
- 87. Denies the allegations in Paragraph 244.

- 88. Denies the allegations in Paragraph 245.
- 89. Denies the allegations in Paragraph 246.
- 90. Denies the allegations in Paragraph 247.
- 91. Denies the allegations in Paragraph 248.
- 92. Denies the allegations in Paragraph 249.
- 93. Denies the allegations in Paragraph 250.
- 94. Denies the allegations in Paragraph 251.
- 95. Denies the allegations in Paragraph 252.
- 96. Denies the allegations in Paragraph 253.
- 97. Denies the allegations in Paragraph 254.
- 98. Denies the allegations in Paragraph 255.
- 99. Denies the allegations in Paragraph 256.
- 100. Denies the allegations in Paragraph 257.
- 101. Denies the allegations in Paragraph 258.
- 102. Denies the allegations in Paragraph 259.
- 103. Denies the allegations in Paragraph 260.
- 104. Denies the allegations in Paragraph 261.
- 105. Denies the allegations in Paragraph 262.
- 106. Denies the allegations in Paragraph 263.
- 107. Denies the allegations in Paragraph 264.
- 108. Denies the allegations in Paragraph 265.
- 109. Denies the allegations in Paragraph 266.
- 110. Denies the allegations in Paragraph 267.



- 111. Denies the allegations in Paragraph 268.
- 112. Denies the allegations in Paragraph 269.
- 113. Denies the allegations in Paragraph 270.
- 114. Denies the allegations in Paragraph 271.
- 115. Denies the allegations in Paragraph 272.
- 116. Denies the allegations in Paragraph 273.
- 117. Denies the allegations in Paragraph 274.
- 118. Denies the allegations in Paragraph 275.
- 119. Denies the allegations in Paragraph 276.
- 120. Denies the allegations in Paragraph 277.
- 121. Denies the allegations in Paragraph 278.
- 122. Denies the allegations in Paragraph 279.
- 123. Denies the allegations in Paragraph 280.
- 124. Denies the allegations in Paragraph 281.
- 125. Denies the allegations in Paragraph 282.
- 126. Denies the allegations in Paragraph 283.
- 127. Denies the allegations in Paragraph 284.
- 128. Denies the allegations in Paragraph 285.
- 129. Denies the allegations in Paragraph 286.
- 130. Denies the allegations in Paragraph 287.
- 131. Denies the allegations in Paragraph 288.
- 132. Denies the allegations in Paragraph 289.
- 133. Denies the allegations in Paragraph 290.

- 134. Denies the allegations in Paragraph 291.
- 135. Denies the allegations in Paragraph 292.
- 136. Denies the allegations in Paragraph 293.
- 137. Denies the allegations in Paragraph 294.
- 138. Denies the allegations in Paragraph 295.
- 139. Denies the allegations in Paragraph 296.
- 140. Denies the allegations in Paragraph 297.
- 141. Denies the allegations in Paragraph 298.
- 142. Denies the allegations in Paragraph 299.
- 143. Denies the allegations in Paragraph 300.
- 144. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraphs 301 – 312.

### **AFFIRMATIVE DEFENSES**

#### **First Affirmative Defense – Failure to State a Claim**

145. The Verified Complaint fails to state facts sufficient to constitute one or more causes of action under the New York City Human Rights Law (NYCHRL), New York State Human Rights Law (NYSHRL), or applicable common law, including but not limited to assault, battery, intentional infliction of emotional distress, or retaliation.

#### **Second Affirmative Defense – Plaintiff Was the Harasser**

146. Plaintiff, not Defendant, was the more senior officer and primary aggressor in the relationship. She initiated unwanted sexual contact, emotionally manipulated Defendant, and used her departmental authority and influence to coerce personal access and control. Her own

conduct disqualifies her from asserting claims of harassment or discrimination under NYCHRL or NYSHRL.

**Third Affirmative Defense – No Actionable Discriminatory or Retaliatory Conduct**

147. Even if Plaintiff's allegations were taken as true (which Defendant denies), they do not rise to the level of unlawful discrimination or retaliation under the NYCHRL or NYSHRL. Plaintiff has not suffered any tangible or intangible adverse action causally connected to a protected activity or protected characteristic.

**Fourth Affirmative Defense – Conduct Constitutes Petty Sights or Trivial Inconveniences**

148. The conduct alleged by Plaintiff amounts to no more than isolated incidents, miscommunications, or trivial disputes. Under NYC Admin. Code § 8-107(1), liability may not be imposed for conduct that constitutes merely "petty slights or trivial inconveniences."

**Fifth Affirmative Defense – Lack of Proximate Cause**

149. Any emotional distress or reputational harm claimed by Plaintiff was not proximately caused by Defendant's conduct, but rather stems from Plaintiff's own actions, relationships with third parties, and efforts to preempt scrutiny of her professional misconduct.

**Sixth Affirmative Defense – Plaintiff's Consent and Initiation of Contact**

150. To the extent Plaintiff alleges sexual misconduct, assault, battery, or harassment, such claims are barred by her express and implied consent, as demonstrated by written communications, verbal expressions of desire, and repeated invitations to Defendant. Plaintiff initiated multiple encounters and was an active, willing participant in the alleged conduct. She also recorded sexual acts without Defendant's knowledge—negating any claim that she was a passive or unwilling participant.

**Seventh Affirmative Defense – Unclean Hands and Abuse of Process**

151. Plaintiff brings this action in bad faith, not to vindicate any legitimate harm, but to deflect attention from her own inappropriate conduct and to suppress Defendant's anticipated reporting of misconduct. Plaintiff's pattern of manipulation, retaliation, and institutional misuse of her authority bars her from obtaining equitable or legal relief.

#### **Eighth Affirmative Defense – Statute of Limitations**

152. One or more of Plaintiff's claims may be barred in whole or in part by the applicable statute of limitations, particularly with respect to alleged acts occurring more than three years prior to the filing of the Complaint.

#### **Ninth Affirmative Defense – After-Acquired Evidence**

153. Defendant reserves the right to introduce after-acquired evidence of Plaintiff's misconduct—including policy violations, retaliatory reporting tactics, and misuse of NYPD resources—which, if known at the time, would have resulted in discipline or disqualification, and which now bar or limit any equitable recovery.

#### **COUNTERCLAIMS**

154. At all relevant times, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY, while acting under color of her official duties as a supervisory officer within the New York City Police Department (NYPD), subjected Defendant/Counterclaim-Plaintiff SHATORRA FOSTER to a sustained course of coerced sexual conduct, psychological manipulation, and retaliatory abuse. Despite the clear indicia of misconduct—including workplace rumors, observable proximity between the parties, and subsequent disciplinary escalation against FOSTER—Defendant THE CITY OF NEW YORK failed to intervene, investigate, or remediate the harm. As such, the City is liable under the New York State Human Rights Law (NYSHRL) and New York City Human Rights Law (NYCHRL), and its agents' conduct enabled violations actionable

under the New York City Gender-Motivated Violence Act (GMVA), Administrative Code § 10-1101 et seq.

### **PARTIES**

155. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER is an individual residing in the City and State of New York, and at all relevant times was employed by the New York City Police Department.

156. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY is an individual residing in the City and State of New York, and at all relevant times was employed as a supervisor within the New York City Police Department.

157. Counterclaim Defendant THE CITY OF NEW YORK is a municipal entity organized under the laws of the State of New York. The City operates and maintains the New York City Police Department (“NYPD”) and is responsible for the hiring, training, supervision, and discipline of its employees.

158. At all relevant times, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY acted under color of her official duties as a supervisory officer within the New York City Police Department (NYPD), exploiting her authority to initiate, coerce, and sustain a pattern of unwanted sexual conduct and psychological domination over Defendant/Counterclaim-Plaintiff SHATORRA FOSTER. These acts occurred on and off duty, including within official NYPD facilities, and were known or knowable to other members of the service and agents of the City of New York.

159. Despite indicia of misconduct—including observable favoritism, concerning proximity, workplace gossip, and retaliatory disciplinary escalation—Defendant THE CITY OF NEW YORK failed to intervene, investigate, or implement remedial measures. Instead, through

deliberate indifference or tacit approval, it enabled and ratified Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's misconduct, ultimately retaliating against Defendant/Counterclaim-Plaintiff SHATORRA FOSTER by initiating formal disciplinary charges.

160. Accordingly, Defendant THE CITY OF NEW YORK is liable under the New York State Human Rights Law (NYSHRL) and the New York City Human Rights Law (NYCHRL) for maintaining a hostile work environment, permitting gender-based harassment, and enabling supervisory abuse in violation of statutory protections.

**Sexual Misconduct and Gender-Based Violence by Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY, with the Knowledge and Acquiescence of Defendant THE CITY OF NEW YORK, in Violation of the NYCHRL, NYSHRL, and the Gender-Motivated Violence Act**

161. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER, by her attorneys, brings the following counterclaims against Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY, and alleges as follows:

162. Upon information and belief, supervisory personnel and internal oversight bodies within the NYPD—including the Office of Equity and Inclusion and Internal Affairs Bureau—were aware, or should have been aware, of Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's longstanding pattern of sexually inappropriate, coercive, and retaliatory conduct toward other female officers, both within and outside the workplace.

163. Despite this actual or constructive knowledge, the NYPD failed to take remedial or disciplinary action, demonstrating deliberate indifference and a reckless disregard for the rights and safety of subordinate officers, including Defendant/Counterclaim-Plaintiff SHATORRA FOSTER.

164. On or about September 6, 2023, Defendant/Counterclaim-Plaintiff SHATORRA FOSTER, a junior officer, attended a retirement luncheon at One Police Plaza (1PP). It was

during this event that she was first introduced to Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY, a police supervisor.

165. The interaction consisted of brief, inconsequential small talk. At the time, there was no personal or professional relationship between the parties.

166. On or about October 16, 2023, Defendant/Counterclaim-Plaintiff SHATORRA FOSTER visited the Police Commissioner's Office to see her mother's friend, Detective Tiesha Thompson.

167. Upon finding that Detective Thompson was not present, Defendant/Counterclaim-Plaintiff FOSTER entered the Operations Office to briefly greet a former colleague.

168. As Defendant/Counterclaim-Plaintiff FOSTER was preparing to exit, Plaintiff/Counterclaim-Defendant HEADLEY, seated at her desk, summoned her over in a manner that suggested authority and familiarity, saying, "Hey, come over here."

169. Defendant/Counterclaim-Plaintiff FOSTER approached, unsure of the purpose. When she inquired about Detective Thompson's whereabouts, HEADLEY informed her she was off duty that day.

170. Plaintiff/Counterclaim-Defendant HEADLEY then requested they take a photograph together to send to Detective Thompson.

171. After capturing the image, Plaintiff/Counterclaim-Defendant HEADLEY texted the photo to Detective Thompson.

172. Immediately afterward, HEADLEY asked Defendant/Counterclaim-Plaintiff FOSTER for her phone number, ostensibly to send her a copy of the picture.

173. When FOSTER provided her personal cell number, HEADLEY specifically confirmed it was her personal line—not her department-issued phone—indicating a desire to initiate nonprofessional communication.

174. As Defendant/Counterclaim-Plaintiff FOSTER attempted to exit again, HEADLEY prolonged the interaction by striking up a casual conversation about FOSTER's Gucci backpack.

175. HEADLEY asked where the backpack had been purchased. When FOSTER responded that it came from the Gucci outlet, HEADLEY expressed interest in sale items.

176. FOSTER, feeling cornered but attempting to be polite, shared several pictures of Gucci merchandise while still at HEADLEY's desk.

177. Defendant/Counterclaim-Plaintiff FOSTER then left the office, unsettled by the overly familiar and intrusive exchange initiated by her superior officer.

178. Shortly thereafter, between October 19 and October 22, 2023, Plaintiff/Counterclaim-Defendant HEADLEY began sending unsolicited text messages to Defendant/Counterclaim-Plaintiff FOSTER.

179. These messages grew in frequency and inappropriateness. On or about October 22, 2023, HEADLEY placed a late-night FaceTime audio call while audibly intoxicated, slurring her words and using flirtatious language.

180. Defendant/Counterclaim-Plaintiff FOSTER did not welcome this behavior and felt deeply uncomfortable, but was wary of provoking her supervisor.

181. From October 24 through October 27, 2023, the contact escalated. HEADLEY made repeated late-night calls and texts to FOSTER, often discussing her own romantic history in disturbing terms.



182. HEADLEY boasted that several of her ex-girlfriends had become suicidal or emotionally unstable after the relationship ended, implying that she held powerful emotional control over her partners.

183. Plaintiff/Counterclaim-Defendant HEADLEY repeatedly implied that only “strong” women could handle being with her, suggesting that rejecting her advances would mean FOSTER was weak.

184. These messages, couched in emotional manipulation and power dynamics, made Defendant/Counterclaim-Plaintiff FOSTER increasingly anxious and fearful.

185. Between October 28 and October 30, 2023, HEADLEY began aggressively pressuring Defendant/Counterclaim-Plaintiff FOSTER to come to her apartment.

186. When FOSTER declined, HEADLEY would lash out, accusing her of abandonment, and insinuating she was on the verge of a breakdown.

187. HEADLEY framed her emotional state as fragile, frequently suggesting she might harm herself if FOSTER didn’t comply—further intensifying the psychological pressure on a subordinate who felt professionally and personally trapped.

188. Feeling manipulated, guilt-ridden, and fearful of retaliation, Defendant/Counterclaim-Plaintiff FOSTER ultimately acquiesced and visited Plaintiff/Counterclaim-Defendant HEADLEY’s residence on or about November 2, 2023.

189. Once there, Plaintiff/Counterclaim-Defendant HEADLEY engaged Defendant/Counterclaim-Plaintiff FOSTER in conversation that quickly turned personal and intimate.

190. Plaintiff/Counterclaim-Defendant HEADLEY initiated physical contact which rapidly escalated into sexual conduct.

191. Defendant/Counterclaim-Plaintiff FOSTER did not affirmatively consent to the encounter but felt coerced by the weight of prior emotional manipulation and fear of potential workplace retaliation.

192. From November through December 2023, HEADLEY used this encounter as leverage to force continued contact.

193. HEADLEY regularly texted FOSTER, reminding her of their “special bond” and insisting that she had never connected with anyone else in the same way.

194. Defendant/Counterclaim-Plaintiff FOSTER attempted to maintain boundaries, but HEADLEY’s emotional manipulation intensified—portraying rejection as betrayal and escalating feelings of guilt and anxiety in FOSTER.

195. HEADLEY’s behavior grew increasingly controlling. She questioned FOSTER’s friendships, monitored her social media activity, and even demanded explanations for whom she followed on Instagram.

196. On or about December 22, 2023, FOSTER declined to meet HEADLEY over the holidays.

197. In response, HEADLEY sent guilt-laden text messages, implying that FOSTER’s refusal to spend time with her was tantamount to abandonment and that there would be personal and professional consequences.

198. Between December 24 and December 31, 2023, HEADLEY continued using emotional blackmail to coerce FOSTER into resumed physical intimacy—repeatedly asserting that only FOSTER could “stabilize” her emotionally.

199. HEADLEY’s communications vacillated between affectionate overtures and emotional threats, further destabilizing FOSTER’s mental and emotional well-being.

200. During this period, FOSTER increasingly feared the situation was becoming unsustainable but remained reluctant to report the misconduct due to HEADLEY's supervisory rank and volatile behavior.

201. These events laid the foundation for an unwanted, psychologically coercive, and professionally dangerous relationship imposed by Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY under the guise of concern, mentorship, and emotional vulnerability.

202. In January 2024, Defendant/Counterclaim-Plaintiff SHATORRA FOSTER began distancing herself from Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY in an effort to reclaim her personal and professional boundaries.

203. In response, HEADLEY's behavior became more erratic, intrusive, and retaliatory. She bombarded FOSTER with texts and calls, accusing her of being disloyal, dishonest, and "just like all the others."

204. HEADLEY expressed paranoia that FOSTER was telling others about their relationship and demanded verbal and written reassurances of loyalty and silence.

205. HEADLEY continued to manipulate FOSTER emotionally by asserting that any attempt to sever contact would "destroy her."

206. In February 2024, HEADLEY began making uninvited appearances at FOSTER's job sites, particularly when she was working late tours.

207. HEADLEY's presence was not work-related. Instead, she loitered near the precinct, texting FOSTER to come outside under the pretense of needing to talk.

208. When FOSTER refused, HEADLEY would leave threatening or cryptic messages such as "You know I can make things very difficult," or "You should be more careful about who you ignore."

209. FOSTER became fearful that her career was now under threat due to the increasingly hostile and unhinged conduct of her supervisor.

210. On or about March 14, 2024, while on duty and in uniform, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY approached the dormitory room on the 6th Floor of NYPD Headquarters located at One Police Plaza where Defendant/Counterclaim-Plaintiff SHATORRA FOSTER was sleeping. HEADLEY knew FOSTER would be alone at the time.

211. Without warning or consent, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY knocked on the door and entered the room, removed Defendant/Counterclaim-Plaintiff SHATORRA FOSTER's pants and underwear, pushed her onto the bed, and forcibly spread her legs. When FOSTER asked, "Are you crazy?" HEADLEY replied, "Yes," and continued undeterred.

212. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY then performed oral sex on Defendant/Counterclaim-Plaintiff SHATORRA FOSTER, including licking her vagina, labia, and clitoris for approximately ten (10) minutes until FOSTER ejaculated. Upon completion, HEADLEY remarked, "Thank you," and left the room.

213. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER did not consent to the sexual act but refrained from physically resisting or reporting it due to fear of retaliation, shame, and a well-founded belief that internal NYPD investigators would side with her supervisor, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY, rather than her as a subordinate officer.

214. Following the incident, Defendant/Counterclaim-Plaintiff SHATORRA FOSTER felt humiliated, violated, and disempowered. She took a second shower that morning to try to

emotionally process the experience, but continued to conceal the assault out of fear of professional and personal repercussions.

215. In March 2024, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY began spreading false and malicious rumors within the department, insinuating that Defendant/Counterclaim-Plaintiff SHATORRA FOSTER was emotionally unstable, untrustworthy, and sexually promiscuous.

216. These defamatory statements reached mutual colleagues, who began to question Defendant/Counterclaim-Plaintiff SHATORRA FOSTER's judgment and reputation.

217. HEADLEY also referenced their prior sexual contact in text messages, threatening to "show people what [FOSTER] really is" if she continued to rebuff her.

218. HEADLEY's retaliatory behavior caused FOSTER significant emotional distress, professional embarrassment, and fear of being transferred or subjected to baseless internal discipline.

219. By April 2024, HEADLEY began threatening formal complaints and legal action, asserting that she was the victim and that FOSTER was trying to "set her up."

220. HEADLEY falsely claimed that FOSTER had engaged in misconduct, including stalking and harassment, despite there being no factual basis for such claims.

221. On or about May 2024, HEADLEY escalated by contacting a superior officer and accusing FOSTER of improprieties in her personal conduct, prompting an informal inquiry.

222. FOSTER was blindsided by this development and feared for her standing in the department.

223. Between June and August 2024, HEADLEY continued her campaign of retaliation, targeting FOSTER's professional relationships and insinuating that she could affect her assignments, evaluations, or promotion prospects.

224. HEADLEY's texts during this period alternated between threats and apologies, continuing the pattern of coercion: "I didn't mean it, but you bring out the worst in me" followed by "If you push me, I'll have no choice but to go public."

225. HEADLEY continued to assert that she had "receipts" and "records" and could "end" FOSTER if she chose to.

226. HEADLEY's campaign created a toxic and hostile work environment for FOSTER, not just due to the personal harassment, but through intentional professional sabotage.

227. In or around September 2024, HEADLEY became aware that FOSTER had consulted with a legal representative and began to preemptively spread a false narrative portraying herself as the target of a smear campaign.

228. HEADLEY told colleagues and mutual acquaintances that FOSTER was "obsessed," "dangerous," and "not over her," despite HEADLEY being the persistent initiator of contact and threats.

229. In or around October 2024, HEADLEY made veiled public statements suggesting she might be preparing to sue or file complaints, as a tactic to deter FOSTER from coming forward.

230. HEADLEY repeatedly stated, "She won't be believed—people always assume the supervisor is the problem, but I kept everything," in an attempt to silence and discredit FOSTER in advance.

231. On or about October 14, 2024, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY, while assigned as a Lieutenant at the 88th Precinct, orchestrated an encounter with Police Officer Precious C. Redhead, a former romantic partner of Defendant/Counterclaim-Plaintiff SHATORRA FOSTER.

232. At the conclusion of Police Officer Redhead's tour (End of Tour or "EOT"), as she exited the precinct building, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY instructed a female sergeant subordinate to the Department to intercept Police Officer Redhead and direct her to return inside to the desk.

233. Upon Police Officer Redhead's return, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY instructed her to wait outside the precinct for further discussion. A few minutes later, HEADLEY exited the building and walked with Police Officer Redhead under the pretense of escorting her to her vehicle.

234. Instead of going directly to the vehicle, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY diverted the walk to a nearby closed restaurant, insisted on entering despite staff informing her the premises were closed, and persuaded the employees to allow her and Police Officer Redhead to sit inside.

235. Once inside, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY launched into an intrusive and personal interrogation of Police Officer Redhead concerning her past relationship with Defendant/Counterclaim-Plaintiff SHATORRA FOSTER. She demanded to know whether Redhead remained in contact with FOSTER, when they last spoke or saw each other, and whether Redhead continued any communication with FOSTER's mother.

236. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY further asked Police Officer Redhead to explain the reasons for her prior breakup with Defendant/Counterclaim-

Plaintiff SHATORRA FOSTER, and then abruptly shifted the conversation to Redhead's internal disciplinary history within the NYPD.

237. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY stated, "I know everything," and asserted that she was aware Police Officer Redhead had previously been placed on department modification status for approximately eighteen (18) months. When Redhead asked how she obtained that information, HEADLEY responded confidently and without hesitation that it was because Redhead was "suicidal."

238. This exchange deeply unsettled Police Officer Redhead, who expressed that she no longer wished to continue the conversation. In response, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY asked, "Are you intimidated by me?"—a remark that underscored the inherent power imbalance of the interaction.

239. Before Redhead departed, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY made an additional unsolicited disclosure by stating that she and Defendant/Counterclaim-Plaintiff SHATORRA FOSTER were subjects of an "open active IAB case," information that was not previously known to Police Officer Redhead and raised concerns about improper access to internal investigative matters.

240. Upon information and belief, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY engaged in this interaction not for any legitimate supervisory or professional purpose, but to surveil, intimidate, and manipulate a third party who had historical ties to Defendant/Counterclaim-Plaintiff SHATORRA FOSTER, thereby exerting psychological control and spreading retaliatory innuendo through unofficial channels.

241. This incident further evidences Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's misuse of NYPD authority, her pattern of retaliatory conduct, and her ongoing



obsession with Defendant/Counterclaim-Plaintiff SHATORRA FOSTER's private relationships, which she sought to dominate and control through intimidation, surveillance, and the strategic misuse of confidential personnel data.

242. On or about November 6, 2024, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY commenced the instant civil action against Defendant/Counterclaim-Plaintiff SHATORRA FOSTER.

243. The filing was not motivated by any genuine legal grievance but was calculated to preemptively silence FOSTER, discredit her, and undermine any potential complaint or disclosure of HEADLEY's misconduct.

244. The Complaint filed by HEADLEY is rife with misrepresentations, omissions, and distortions of fact, which are intended to weaponize the court system as a shield against accountability for her predatory and retaliatory conduct.

245. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER has suffered emotional distress, reputational harm, professional damage, and fear of retaliation as a direct result of HEADLEY's actions.

246. HEADLEY's conduct toward FOSTER was unwelcome, exploitative, and unlawful under both the New York State Human Rights Law and the New York City Human Rights Law.

247. Upon information and belief, following the breakdown of the inappropriate supervisory-subordinate relationship she initiated and sustained, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY engaged in a sustained pattern of harassment, coercion, and retaliatory abuse of authority directed at Defendant/Counterclaim-Plaintiff SHATORRA FOSTER.

248. Rather than accept the termination of personal contact, HEADLEY escalated her retaliatory conduct by leveraging her supervisory status within the New York City Police Department (“NYPD”) to surveil, intimidate, and undermine FOSTER’s professional reputation.

249. This campaign included repeated threats to use her influence to damage FOSTER’s career, spreading false and malicious rumors within the Department, and exploiting NYPD resources to investigate or monitor FOSTER for retaliatory purposes.

250. On or about December 18, 2024, the NYPD served formal Charges and Specifications upon Defendant/Counterclaim-Plaintiff SHATORRA FOSTER, containing allegations that stemmed from HEADLEY’s retaliatory and pretextual complaints.

251. These Charges included multiple counts of criminal and departmental misconduct, including but not limited to: (1) Stalking in the Fourth Degree (Penal Law § 120.45), (2) Aggravated Harassment in the Second Degree (Penal Law § 240.30), (3) Falsely Reporting an Incident (Penal Law § 240.50), (4) Improper Database Inquiries (P.G. 219-14), and (5) Improper Use of Department-Issued Cell Phone (P.G. 219-32).

252. These disciplinary charges were initiated and fueled by HEADLEY’s retaliatory intent, not by legitimate investigative concerns. The allegations contained in the charges are unsubstantiated, distort the timeline of contact, and misrepresent FOSTER’s conduct.

253. Upon information and belief, HEADLEY made repeated efforts to initiate these charges behind the scenes by communicating with NYPD Internal Affairs, Legal Bureau staff, and other supervisors, all while positioning herself falsely as the victim.

254. HEADLEY’s retaliatory efforts were contemporaneous with her threats to “end” FOSTER, her statements that she would “go public,” and her preemptive filing of the instant civil action as a litigation shield.

255. The issuance of formal disciplinary charges against FOSTER—instigated by the complainant in this action—constitutes clear and actionable retaliation under both the New York State Human Rights Law and the New York City Human Rights Law.

256. HEADLEY's misuse of Departmental authority and disciplinary processes further illustrates the structural imbalance and coercive dynamic inherent in the relationship, whereby HEADLEY groomed, manipulated, and ultimately punished her subordinate for asserting boundaries and resisting further abuse.

257. From approximately October 2023 through June 2024, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY engaged in repeated, coercive, and unwanted sexual conduct toward Defendant/Counterclaim-Plaintiff SHATORRA FOSTER under the guise of a personal relationship, while exploiting her supervisory position within the New York City Police Department.

258. Throughout this period, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY performed oral sex on Defendant/Counterclaim-Plaintiff SHATORRA FOSTER on numerous occasions at her apartment located in Harlem, New York, and repeatedly demanded that FOSTER reciprocate, notwithstanding FOSTER's discomfort and unwillingness.

259. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER frequently attempted to avoid sexual contact by falsely claiming to be menstruating, because she feared emotional and professional repercussions if she did not comply with Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's sexual demands. FOSTER understood from experience that HEADLEY became emotionally volatile and aggressive if she declined to engage in sexual activity.

260. The sexual encounters were exclusively oral in nature; however, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY routinely performed oral sex in a rough and aggressive manner that caused Defendant/Counterclaim-Plaintiff SHATORRA FOSTER significant discomfort, both physically and emotionally.

261. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY insisted on continuing the sexual act until Defendant/Counterclaim-Plaintiff SHATORRA FOSTER ejaculated, even when FOSTER expressed resistance or attempted to disengage. FOSTER was often compelled to force herself to climax simply to end the unwanted contact.

262. Following these coercive sexual acts, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY would often withdraw emotionally and avoid communication, leaving Defendant/Counterclaim-Plaintiff SHATORRA FOSTER feeling objectified and emotionally destabilized.

263. On multiple occasions between October 2023 and June 2024, Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY made disturbing and possessive statements to Defendant/Counterclaim-Plaintiff SHATORRA FOSTER, including but not limited to: “I don’t want no one to ever have your pussy,” and “You and I don’t have a relationship—I have a relationship with your pussy.”

264. During this same period, HEADLEY repeatedly told FOSTER that she cut her fingernails short so she could digitally penetrate FOSTER’s vagina, despite FOSTER never consenting to such conduct.

265. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY also frequently displayed large sex toys, including oversized dildos, to Defendant/Counterclaim-Plaintiff

SHATORRA FOSTER, boasting, “One day I’m going to use this on you and toss you around,” further contributing to the hostile and sexually charged atmosphere she created.

266. The unwanted sexual acts, coercive statements, and repeated intrusions by Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY caused Defendant/Counterclaim-Plaintiff SHATORRA FOSTER profound emotional and psychological harm. HEADLEY’s abuse of supervisory authority to compel sexual contact—including forced oral sex, sexually explicit threats, and domination masked as intimacy—deeply undermined FOSTER’s personal autonomy, sense of safety, and dignity as both an employee and human being. These actions fostered a sustained atmosphere of fear, submission, and humiliation, constituting a hostile work environment in violation of the New York City Human Rights Law (NYCHRL) and the New York State Human Rights Law (NYSHRL). The psychological impact was exacerbated by the power imbalance between a commanding officer and subordinate, the retaliatory risk of non-compliance, and the City’s failure to intervene or protect FOSTER from this escalating misconduct.

### **FIRST COUNTERCLAIM**

#### **Sexual Harassment in Violation of the New York State Human Rights Law (NYSHRL), Executive Law § 296**

267. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY subjected Defendant/Counterclaim-Plaintiff SHATORRA FOSTER to severe, pervasive, and unwanted sexual conduct from October 2023 through June 2024, while both were employed by the New York City Police Department.

268. The conduct included repeated nonconsensual oral sex, explicit sexual propositions, coercive sexual threats, and attempts at physical penetration—all initiated by HEADLEY while acting in a supervisory capacity over FOSTER.

269. HEADLEY exploited her position of authority to initiate and perpetuate a non-mutual sexual relationship with FOSTER, leveraging fear of retaliation, professional harm, and isolation to extract sexual compliance.

270. These actions materially altered the terms and conditions of FOSTER's employment and would cause a reasonable employee to feel intimidated, degraded, and unsafe.

271. The CITY OF NEW YORK had actual or constructive knowledge of HEADLEY's misconduct and failed to prevent, investigate, or remediate it. The City further ratified the retaliatory conduct by initiating formal disciplinary charges against FOSTER following her withdrawal from the coerced relationship.

272. These acts constitute unlawful sexual harassment in violation of the NYSHRL.

## **SECOND COUNTERCLAIM**

### **Hostile Work Environment in Violation of the New York State Human Rights Law (NYSHRL), Executive Law § 296**

273. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's conduct created a sexually hostile work environment through repeated, invasive, and degrading acts, including unwanted oral sex, controlling sexual commentary, public surveillance of Defendant/Counterclaim-Plaintiff SHATORRA FOSTER's romantic life, and ongoing psychological coercion.

274. The March 14, 2024 sexual assault inside NYPD Headquarters occurred while FOSTER was isolated in a secured dormitory and HEADLEY was on-duty and in uniform, further aggravating the coercive power dynamics.

275. These acts were not isolated but part of a sustained campaign of sexual domination, humiliation, and psychological manipulation, motivated in substantial part by FOSTER's sex and perceived sexual orientation.

276. These actions, statements, and unwanted physical intrusions caused FOSTER severe emotional distress, undermined her sense of autonomy, and created a hostile work environment under the NYSHRL.

### **THIRD COUNTERCLAIM**

#### **Retaliation in Violation of the New York State Human Rights Law (NYSHRL), Executive Law § 296**

277. After Defendant/Counterclaim-Plaintiff SHATORRA FOSTER began resisting Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's unwanted sexual advances and withdrew from the coerced sexual relationship, HEADLEY retaliated against her.

278. The retaliatory actions included social isolation, interference with job duties, disparaging comments to others, deliberate humiliation, and the initiation of false disciplinary charges intended to damage FOSTER's career.

279. The CITY OF NEW YORK ratified this retaliation by sustaining the formal charges and ignoring the context of HEADLEY's prior misconduct, despite actual or constructive notice.

280. The adverse actions taken against FOSTER were causally connected to her rejection of HEADLEY's sexual advances and withdrawal from the unwanted relationship.

281. These acts constitute unlawful retaliation under the NYSHRL.

### **FOURTH COUNTERCLAIM**

#### **Sexual Harassment in Violation of the New York City Human Rights Law (NYCHRL), Administrative Code § 8-107**

282. The same conduct described above also violates the broader protections of the NYCHRL, which prohibits gender-based harassment regardless of severity or pervasiveness.

283. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's unwanted sexual advances, coercive sexual comments, and nonconsensual physical acts would cause a reasonable person in Defendant/Counterclaim-Plaintiff SHATORRA FOSTER's position to feel threatened, humiliated, or abused.

284. These acts altered FOSTER's work environment and interfered with her psychological well-being and ability to function professionally.

285. The CITY OF NEW YORK, through its agents and officers, failed to take appropriate remedial action, and is vicariously liable under the NYCHRL.

#### **FIFTH COUNTERCLAIM**

##### **Hostile Work Environment in Violation of the New York City Human Rights Law (NYCHRL), Administrative Code § 8-107**

286. Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY's conduct created an environment of fear, degradation, and sexualized control in violation of the NYCHRL.

287. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER was subjected to sexual comments, pressure, and conduct—including in private spaces and public settings—designed to undermine her independence and professional dignity.

288. HEADLEY's behavior persisted throughout their supervisory relationship and was emboldened by the City's failure to intervene.

289. FOSTER's reasonable efforts to maintain professional boundaries were met with increased hostility and unwanted surveillance, further exacerbating the hostile environment.



**SIXTH COUNTERCLAIM****Retaliation in Violation of the New York City Human Rights Law (NYCHRL),  
Administrative Code § 8-107(7)**

290. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER's refusal to engage in further sexual acts with Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY, as well as her efforts to distance herself from the relationship, constituted protected activity under the NYCHRL.

291. In direct response, HEADLEY engaged in retaliatory actions, including workplace sabotage, humiliation, and false accusations.

292. The CITY OF NEW YORK ratified these retaliatory acts by failing to discipline HEADLEY and instead punishing FOSTER through formal disciplinary proceedings, despite the clear evidence of abuse.

293. The retaliatory acts are independently actionable under the NYCHRL.

**SEVENTH COUNTERCLAIM****Gender-Motivated Violence in Violation of the New York City Gender-Motivated Violence Act (GMVA), Administrative Code § 10-1101 et seq.**

294. The oral sex committed on March 14, 2024, while Defendant/Counterclaim-Plaintiff SHATORRA FOSTER was isolated in a secured dormitory, was committed without consent, through abuse of authority and psychological coercion, and qualifies as criminal sexual conduct under N.Y. Penal Law §§ 130.05 and 130.50.

295. These actions meet the definition of a gender-motivated act of violence under the GMVA.

296. The March 14, 2024 act was not an isolated incident but part of a pattern of power-based sexual misconduct aimed at controlling and degrading FOSTER based on her gender.

297. As a direct and proximate result of this assault, FOSTER suffered physical invasion, emotional trauma, loss of personal autonomy, and reputational harm.

298. FOSTER is entitled to compensatory and punitive damages, injunctive relief, and attorneys' fees under the GMVA.

### **JURY TRIAL**

299. Defendant/Counterclaim-Plaintiff SHATORRA FOSTER demands a trial by jury of all issues in this action that are so triable.

### **PRAYER FOR RELIEF**

WHEREFORE, Defendant/Counterclaim-Plaintiff SHATORRA FOSTER demands judgment against Plaintiff/Counterclaim-Defendant TREVLYN HEADLEY and Defendant CITY OF NEW YORK, jointly and severally, awarding compensatory damages, punitive damages, injunctive relief, attorneys' fees and costs, and such other and further relief as the Court deems just and proper.

Dated: June 26, 2025  
New York, N.Y.

Respectfully submitted,  
By: /s/Eric Sanders  
Eric Sanders

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VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF NEW YORK

I, SHATORRA FOSTER, being duly sworn, deposes and says:

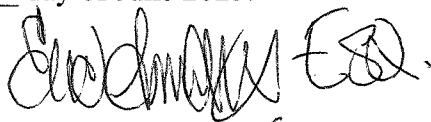
I am the Defendant and Counterclaim-Plaintiff in the within action. I have read the foregoing Verified Answer with Counterclaims and know the contents thereof. The same is true to my knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters, I believe them to be true.

SHATORRA FOSTER



(Signature)

Sworn to before me this

26<sup>TH</sup> day of June 2025.

Notary Public

State of New York

[Commission Info]

COUNTY OF WESTCHESTER  
REG. NO. 02SA0013820  
EXP. 09.26.2027

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

INDEX NO.: 155228/2025

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TREVLYN HEADLEY,

Plaintiff,

-against-

THE CITY OF NEW YORK; SHATORRA FOSTER, Individually,  
And TANIA KINSELLA, Individually

Defendants'

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**VERIFIED ANSWER WITH COUNTERCLAIMS**

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*Duly submitted by:*

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