

Eric Sanders

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Sent: Friday, May 29, 2026 16:51
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Cc: Shatorra Foster [REDACTED]
Subject: Demanding An Investigation Into the Sexual Misconduct, Retaliatory Discipline, Selective Enforcement, and Investigative Cover-Up Involving Trevlyn O. Headley
Attachments: Charges and Specifications.pdf; Verified Answer With Counterclaims_ecf.pdf; Notice of Entry_CPLR 3211 Motion.pdf
Importance: High
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COMPLAINT TO THE NYPD OFFICE OF EQUITY AND INCLUSION AND INTERNAL AFFAIRS BUREAU

Re: Police Officer Shatorra J. Foster, Tax Registry No. 966063
Subject Officer: Sergeant Trevlyn O. Headley, formerly probationary lieutenant / sergeant, Tax Registry No. 945808
Related IAB Log No.: 2024-20012 / Case No. (SIU) M-2024-1217
Related Department Advocate Case No.: C-030622
Related Civil Action: Headley v. City of New York, et al., Index No. 155228/2025, Supreme Court, New York County

To the Office of Equity and Inclusion and Internal Affairs Bureau:

Please accept this complaint on behalf of Police Officer Shatorra J. Foster. This complaint concerns serious sexual misconduct, sex-based harassment, retaliation, workplace grooming, misuse of Department authority, misuse of Department computer systems, improper access to or disclosure of confidential Department information, witness intimidation or influence, selective enforcement, and investigative irregularities involving Trevlyn O. Headley.

This complaint is submitted to place the Office of Equity and Inclusion, Internal Affairs Bureau, Department Advocate's Office, and all appropriate Department decisionmakers on formal notice that the Department's prior treatment of these issues appears incomplete, one-sided, and structurally unreliable. The issue is not merely that respondent disputes the pending disciplinary charges. The issue is that the Department appears to have built a Headley-driven disciplinary theory against respondent while failing to meaningfully investigate Headley as an alleged sexual abuser, retaliator, subject officer, and potential source of the very disciplinary narrative now being used against respondent.

The Department's own materials appear to show that Headley was not merely a complainant. Headley was also identified as a subject officer; had a substantiated computer-misuse finding involving respondent; was apparently demoted from probationary lieutenant to sergeant due to an OEEO-related matter; was placed on modified assignment; and was the subject of multiple allegations bearing on credibility, abuse of authority, Department-system access, and workplace misconduct. Those facts are directly relevant to any fair assessment of the disciplinary case now pending against respondent.

I. SUMMARY OF COMPLAINT

Respondent requests a full, conflict-aware OEI and IAB investigation into the following:

1. Headley's alleged sexual assault of respondent inside NYPD Headquarters on March 14, 2024;
2. Headley's alleged sexual harassment, sexually coercive conduct, grooming, retaliation, and abuse of authority toward respondent;
3. Headley's alleged sexual harassment, retaliation, coercion, intimidation, or abuse of authority involving other female members of the service;
4. Headley's alleged use of Department systems, including the substantiated computer-misuse finding involving her CPR inquiry of respondent on November 15, 2023;
5. the timing and purpose of Headley's CPR inquiry of respondent, which respondent contends occurred before any sexual contact between these parties can fairly be characterized as existing and may reflect workplace grooming;
6. Headley's alleged access to, use of, or disclosure of confidential Department personnel, disciplinary, mental-health-related, or IAB information concerning respondent, Police Officer Precious C. Redhead, and other members of the service;
7. Headley's role in initiating, shaping, influencing, or benefiting from the Internal Affairs allegations that became the basis for the December 18, 2024 Charges and Specifications against respondent;
8. the Department's repeated use of "stalker" or stalking-related terminology before disciplinary adjudication;
9. the Department's apparent failure to substantively reassess the investigation after respondent filed her Verified Answer with Counterclaims alleging sexual harassment, sexual coercion, retaliation, abuse of authority, sexual assault, and misuse of Department processes by Headley;
10. the basis for Headley's demotion from probationary lieutenant to sergeant effective 2400 hours on June 27, 2025, including whether that demotion was connected to OEI findings, respondent's legal allegations, sexual harassment, retaliation, or misconduct involving female members of the service;
11. whether the Department's continued prosecution of respondent on Headley-driven allegations violates or implicates New York City Administrative Code § 8-107.1, including protections for actual or perceived victims of sex offenses, stalking, or domestic-violence-related conduct;
12. whether the Department's continued prosecution of respondent violates or implicates New York City Administrative Code § 8-107(7), which prohibits retaliation against persons who oppose discriminatory practices, complain of discrimination, or resist conduct protected by the New York City Human Rights Law; and
13. whether the Department's investigation and charging decision reflect selective enforcement, pretext, failure to investigate, failure to accommodate victim-status realities, or retaliatory adoption of an alleged perpetrator's narrative.

II. THE MARCH 14, 2024 SEXUAL ASSAULT ALLEGATION INSIDE NYPD HEADQUARTERS

Respondent alleges that on or about March 14, 2024, while on duty and in uniform, Headley approached the dormitory room on the sixth floor of NYPD Headquarters located at One Police Plaza where respondent was sleeping. Headley allegedly knew respondent would be alone at the time.

Respondent alleges that, without warning or consent, Headley knocked on the door, entered the room, removed respondent's pants and underwear, pushed respondent onto the bed, and forcibly spread respondent's legs. When respondent asked, "Are you crazy?" Headley allegedly replied, "Yes," and continued undeterred.

Respondent alleges that Headley then performed oral sex on respondent, including licking respondent's vagina, labia, and clitoris for approximately ten minutes until respondent ejaculated. Upon completion, Headley allegedly remarked, "Thank you," and left the room.

Respondent alleges that she did not consent to the sexual act. Respondent further alleges that she refrained from physically resisting or immediately reporting the incident because of fear of retaliation, shame, and a well-founded belief that internal NYPD investigators would side with Headley, a superior officer, rather than respondent as a subordinate officer.

This allegation is central. It allegedly occurred inside NYPD Headquarters. It allegedly involved a superior officer. It allegedly involved nonconsensual sexual conduct. It allegedly preceded Headley's July 8, 2024 Internal Affairs report that later became the foundation for Department charges against respondent.

OEI and IAB must investigate this allegation directly. It cannot be treated as collateral to respondent's disciplinary case, and it cannot be avoided by labeling the broader matter as a stalking or harassment investigation against respondent.

III. TROUBLING TIMELINE AND RETALIATORY SEQUENCE

The preliminary timeline presently understood by respondent is as follows:

On November 15, 2023, Headley ran respondent in CPR. Internal Affairs later substantiated that computer-misuse allegation.

Respondent contends that the November 15, 2023 CPR inquiry occurred before any any sexual contact between these parties can fairly be characterized as existing between respondent and Headley. Respondent contends this timing supports a workplace-grooming theory: Headley allegedly used Department systems and workplace access to obtain information about respondent while initiating personal, sexual, or coercive access.

On March 14, 2024, respondent alleges that Headley forcibly performed a sexual act upon her inside NYPD Headquarters.

On July 8, 2024, Headley reported to IAB allegations that later became the subject of disciplinary charges against respondent.

In September 2024, respondent was subjected to a department interview.

On December 18, 2024, the Department initiated Charges and Specifications against respondent based upon complaints made by Headley.

On June 27, 2025, respondent filed a Verified Answer with Counterclaims in Headley v. City of New York, et al., Index No. 155228/2025, alleging sexual harassment, sexual coercion, retaliation, abuse of authority, sexual assault, and misuse of Department processes by Headley.

The Internal Affairs materials also reflect that a Finest message showed Headley was demoted from probationary lieutenant to sergeant effective 2400 hours on June 27, 2025. That is the same date respondent filed her Verified Answer with Counterclaims.

Respondent recognizes that timing alone does not establish causation. However, the timing is sufficiently significant to require clarification. If Headley's demotion was connected in any way to respondent's allegations, respondent's legal filing, the OEI matter, or other sexual-harassment or retaliation findings involving Headley, the Department should acknowledge that connection. If the demotion was unrelated, the Department should explain the actual basis for the demotion and produce the records necessary to evaluate its relevance to Headley's credibility, pattern, motive, and the Department's charging decision against respondent.

On the present record, the concern is that the investigative file appears to contain both respondent's legal allegations against Headley and Department information reflecting Headley's OEEO-related demotion, yet it does not appear to contain a meaningful analysis of whether those facts required reassessment of Headley's role as complainant-source or the continued prosecution of respondent on Headley-driven allegations.

IV. WORKPLACE GROOMING AND THE NOVEMBER 15, 2023 CPR QUERY

The substantiated computer-misuse finding involving Headley's November 15, 2023 CPR inquiry of respondent is not merely a technical rule violation.

The timing is critical. Respondent contends that the CPR inquiry occurred before any any sexual contact between these parties can fairly be characterized as existing. According to respondent, Headley's early access to respondent through workplace proximity, personal contact, Department rank, and Department systems was part of a broader pattern of grooming in the workplace.

OEI and IAB should investigate whether Headley's CPR inquiry was the first documented Department-system act in a grooming sequence. The inquiry may reflect Headley's use of Department resources to gather information about a subordinate or junior member of the service while developing personal, sexual, or coercive access to respondent.

Accordingly, OEI and IAB should investigate:

1. why Headley ran respondent in CPR on November 15, 2023;
2. whether there was any legitimate Department purpose for that query;
3. what information Headley accessed or attempted to access;
4. whether Headley accessed or attempted to access other Department databases concerning respondent;
5. whether Headley accessed Department systems concerning Redhead, Montas, Abdulali, or other persons connected to respondent;
6. whether Headley used Department information to groom, monitor, pressure, manipulate, or retaliate against respondent;
7. whether Headley's CPR misuse was considered before the Department charged respondent with improper database inquiries; and
8. whether the Department applied materially different standards to respondent's alleged database conduct and Headley's substantiated database conduct.

This is a selective-enforcement and credibility issue. The Department cannot charge respondent for improper database inquiries while ignoring, minimizing, or compartmentalizing a substantiated computer-misuse finding against Headley involving respondent.

V. THE INVESTIGATION APPEARS TO HAVE ADOPTED "STALKER" AS A PREMISE

Respondent is concerned that the Internal Affairs investigation repeatedly referred to respondent as "Headley's stalker" or otherwise treated stalking as an investigative premise rather than a contested allegation.

That language matters. "Stalker" is not a neutral descriptor. It is a legal, factual, and disciplinary conclusion. The Department ultimately charged respondent with stalking, aggravated harassment, harassment, false reporting, improper database inquiries, and improper use of a department-issued phone. Where the same investigation repeatedly uses the complainant's framing before adjudication, it raises a substantial concern that the investigation moved from allegation to conclusion without maintaining neutrality.

OEI and IAB should review all investigative worksheets, emails, case notes, case summaries, closing memoranda, witness summaries, and communications to determine:

1. who first used the term "stalker";
2. whether the term came from Headley, investigators, or another Department source;
3. whether investigators adopted Headley's characterization before completing the investigation;
4. whether any alternative theory was considered, including workplace grooming, sexual coercion, retaliation, abusive relationship dynamics, victim-status context, or complainant motive;
5. whether the "stalker" label influenced the charging decision;
6. whether the "stalker" framing caused investigators to discount evidence of Headley's misconduct; and
7. whether the investigation was structured to corroborate an assumed conclusion rather than neutrally test competing allegations.

VI. HEADLEY WAS NOT MERELY A COMPLAINANT

The Internal Affairs materials appear to show that Headley was not merely a complainant or passive reporting party. She was identified as a subject officer in the broader investigation.

The materials reflect multiple Headley-related allegations or issues, including but not limited to fraternization, misuse of time, unfit for duty, misuse of a department vehicle, DWI/DWAI, failure to scan in or out of the Attendance App, computer misuse, and other MOS/MOS incidents. Some allegations were closed as unsubstantiated or informational. Others were substantiated.

Most significantly, the materials reflect a substantiated computer-misuse finding involving Headley's running of respondent in CPR on November 15, 2023.

That fact is directly relevant. The Department's case against respondent includes alleged improper Department database inquiries. Yet the same investigative file reflects that Headley misused a department system by running respondent in CPR. That raises issues of credibility, motive, selective enforcement, retaliation, misuse of Department access, and unequal treatment.

OEI and IAB should investigate:

1. why Headley was treated primarily as a complainant-source despite being a subject officer;

2. whether the Department considered Headley's subject-officer status before relying on her allegations;
3. whether Headley's substantiated computer misuse was disclosed to the Department Advocate's Office and Deputy Commissioner-Trials;
4. whether Headley's OEE0-related demotion was disclosed to the Department Advocate's Office and Deputy Commissioner-Trials;
5. whether Headley's history involving other female members of the service was reviewed; and
6. whether Headley's credibility, motive, pattern, and retaliatory interest were analyzed before Charges and Specifications were preferred or continued against respondent.

VII. RESPONDENT'S LEGAL FILING WAS UPLOADED BUT APPARENTLY NOT SUBSTANTIVELY ANALYZED

Respondent is further concerned that the Department appears to have reviewed or uploaded respondent's legal filing without substantively analyzing its effect on the investigation.

Respondent's Verified Answer with Counterclaims placed the Department on notice that respondent was alleging sexual harassment, sexual coercion, retaliation, abuse of authority, sexual assault, workplace grooming, misuse of Department systems, and misuse of Department processes by Headley. Those allegations were not collateral to the disciplinary case. Respondent specifically alleged that the Charges and Specifications were initiated or fueled by Headley's retaliatory and pretextual complaints.

Uploading respondent's legal filing into an investigative file is not the same as investigating it.

Once the Department had the filing, OEI and IAB should have determined whether the filing required:

1. a supplemental interview of respondent;
2. an interview of Headley concerning respondent's allegations;
3. preservation and review of video, access, command, tour, building-entry, and dormitory records concerning March 14, 2024;
4. review of Headley's OEE0 history and any sexual-harassment findings involving female officers;
5. reassessment of Headley's credibility;
6. review of whether Headley used Department systems, rank, or confidential information to influence witnesses or shape the narrative;
7. reconsideration of the December 18, 2024 Charges and Specifications;
8. supplemental disclosure to the Department Advocate's Office and Deputy Commissioner-Trials;
9. review of whether Administrative Code § 8-107.1 affected the Department's ability to proceed on Headley-driven allegations without considering respondent's victim-status allegations; and
10. review of whether Administrative Code § 8-107(7) applied because respondent was opposing, resisting, reporting, or seeking legal assistance concerning alleged sexual harassment and sexual misconduct.

VIII. POLICE OFFICER PRECIOUS REDHEAD AND CONFIDENTIAL INFORMATION CONCERNS

The materials concerning Police Officer Precious Redhead are significant because they do not exist in isolation.

Respondent's Verified Answer with Counterclaims alleges that on or about October 14, 2024, while assigned as a lieutenant at the 88th Precinct, Headley orchestrated an encounter with Redhead, a

former romantic partner of respondent. Respondent alleges that Headley caused a female sergeant subordinate to direct Redhead back inside the precinct at the end of Redhead's tour, instructed Redhead to wait outside, then walked with Redhead under the pretense of escorting her to her vehicle.

Respondent further alleges that Headley diverted the encounter to a nearby closed restaurant, persuaded employees to allow them inside, and questioned Redhead about respondent, Redhead's past relationship with respondent, whether Redhead remained in contact with respondent, when they last spoke or saw each other, and whether Redhead remained in contact with respondent's mother.

Respondent also alleges that Headley abruptly shifted the conversation to Redhead's internal disciplinary history, stated "I know everything," and asserted that she knew Redhead had been placed on Department modification status for approximately eighteen months. When Redhead asked how Headley obtained that information, Headley allegedly responded that it was because Redhead was "suicidal."

Respondent further alleges that when Redhead expressed discomfort and indicated that she no longer wished to continue the conversation, Headley asked, "Are you intimidated by me?" Before Redhead departed, Headley allegedly disclosed that she and respondent were subjects of an "open active IAB case," information Redhead allegedly did not previously know. Respondent alleges that this encounter was not undertaken for any legitimate supervisory or professional purpose, but to surveil, intimidate, and manipulate a third party connected to respondent.

Those allegations raise direct investigative questions. They concern possible access to confidential Department information, misuse of internal personnel or disciplinary information, improper disclosure of an active IAB matter, intimidation of a potential witness or related third party, and Headley's use of rank or Department status to shape the narrative against respondent.

The Internal Affairs file appears to recognize portions of the broader Redhead issue, including Redhead's role in the case materials and the fact that Headley attempted to persuade others that respondent was responsible for the alleged stalking or harassment. However, respondent has not seen a corresponding analysis explaining whether the Department investigated how Headley allegedly knew Redhead's modification status, disciplinary history, or mental-health-related information; whether Headley accessed any Department database to obtain that information; whether another member of the service disclosed it to her; whether Headley improperly disclosed information about an active IAB case; or whether this conduct was considered in assessing Headley's credibility, motive, retaliation, and abuse of authority.

IX. OTHER FEMALE MEMBERS OF THE SERVICE AND PATTERN EVIDENCE

The broader witness structure is relevant. The Internal Affairs materials identify or refer to multiple employees and witnesses connected to Headley and the broader investigation, including respondent, Redhead, Police Officer Shareefa Abdulali, Sergeant Jeymi Montas, Sergeant Lindiwe Plough, Sgt. Flore Witherspoon, Lieutenant Maria Gilbert, and others.

This matters because respondent's position is that Headley's conduct toward respondent was not isolated and that the Department's own materials place Headley in a broader network of interpersonal, workplace, sexual-harassment, retaliation, access-to-information, and abuse-of-authority concerns involving other female members of the service.

Respondent is informed and believes that Headley may have been found guilty or otherwise sustained in connection with sexual harassment involving other female officers, subject to the Police Commissioner's final decision or related final agency action. Respondent also understands that Headley's misconduct may involve additional female members of the service, including members assigned to or the 52nd Precinct and Manhattan Central Booking.

OEI and IAB must identify and review all Headley-related complaints, investigations, findings, interview summaries, closing reports, command discipline materials, OEO determinations, and disciplinary recommendations concerning sexual harassment, sexual misconduct, retaliation, coercion, stalking, intimidation, abuse of authority, or misconduct involving female members of the service.

The Department cannot fairly analyze Headley as merely a complainant while ignoring materials suggesting that Headley's conduct toward respondent, Redhead, and other women may bear on pattern, motive, credibility, retaliation, witness influence, selective enforcement, and workplace grooming.

X. ADMINISTRATIVE CODE § 8-107.1: VICTIM STATUS

New York City Administrative Code § 8-107.1 protects actual or perceived victims of domestic violence, sex offenses, or stalking. The statute defines "victim of sex offenses or stalking" to include victims of acts that would constitute Penal Law article 130 offenses or stalking offenses. It also recognizes that employment practices based on victim status may include practices based upon the actions of the person who perpetrated acts or threats against the individual.

That framework is relevant here because respondent contends that the Department's disciplinary theory may be based, at least in part, upon allegations generated or influenced by the alleged perpetrator. Respondent alleges that Headley sexually assaulted her, sexually coerced her, groomed her, retaliated against her, used Department resources or processes against her, and then made allegations that became the basis for Department prosecution.

The Department cannot treat respondent's alleged victim status as irrelevant simply because Headley filed complaints first or because the Department framed the resulting disciplinary case as stalking, harassment, database misuse, or false reporting. If the alleged conduct charged against respondent is intertwined with the conduct of the alleged perpetrator, Administrative Code § 8-107.1 is directly implicated.

XI. REYNOLDS v. FRASER AND THE CITY'S OBLIGATION TO ACCOUNT FOR VICTIM STATUS

Reynolds v. Fraser, 5 Misc. 3d 758, 781 N.Y.S.2d 885 (Sup. Ct. N.Y. Cnty. 2004), is instructive. In *Reynolds*, the court vacated a City agency's adverse employment determination where the agency applied a neutral work rule without accounting for the petitioner's protected status as a domestic-violence victim. The court recognized that a City agency may not impose adverse employment consequences while ignoring the statutory protections afforded to victims of domestic violence under the New York City Human Rights Law.

That principle applies here. A City agency may not treat a disciplinary rule as though it exists in isolation where the alleged misconduct is intertwined with protected victim-status circumstances and the actions of the alleged perpetrator. The Department's obligation is not satisfied by saying respondent allegedly violated Department rules. The Department must determine whether Headley's alleged sexual assault,

grooming, coercion, retaliation, stalking-like conduct, misuse of Department systems, or manipulation of Department processes created or materially shaped the conduct the Department now seeks to punish.

XII. ADMINISTRATIVE CODE § 8-107(7): RETALIATION

New York City Administrative Code § 8-107(7) prohibits retaliation against a person because that person opposed a practice forbidden by the New York City Human Rights Law, complained of discrimination, assisted in an investigation, or otherwise engaged in protected activity.

Respondent's resistance to alleged sexual harassment, sexual coercion, and sexual assault; her efforts to distance herself from Headley; her consultation with counsel; her legal filing; and her assertion of claims against Headley constitute, or at minimum implicate, protected activity under the NYCHRL. If Headley used Department complaints, IAB processes, disciplinary channels, witness influence, or Department-system access to punish respondent for resisting or exposing Headley's conduct, that is retaliation.

If the Department adopted Headley's allegations without adequately investigating Headley's motive, pattern, OEEH history, computer misuse, and alleged sexual misconduct, the Department risks ratifying or continuing the retaliation. That issue must be investigated now.

XIII. SUPREME COURT DECISION AND ORDER

The Supreme Court's March 20, 2026 Decision and Order in Headley v. City of New York is directly relevant to the Department's review. The court did not decide the truth of respondent's allegations. However, the court rejected a narrow, context-stripping analysis of those allegations.

Headley sought dismissal by relying on selected text messages and by arguing that those communications defeated respondent's claims of coercion, abuse, lack of consent, and trauma. The court rejected that approach. The court recognized that selected communications are susceptible to multiple interpretations and require context and credibility determinations. The court described the alleged relationship as complex, complicated, confused, contradictory, and perhaps toxic. The court further recognized that human reactions to abuse, trauma, coercion, domestic violence, and assault in the context of a complicated romantic relationship may vary, may appear irrational, and may differ from what someone viewing the situation from a safe distance might expect. The court also stated that it would not conclude respondent consented to any particular act based upon selected text messages.

That reasoning matters. OEI and IAB should not treat delayed disclosure, continued contact, selected communications, alleged admissions, or an unsubstantiated internal disposition as dispositive of respondent's credibility, Headley's credibility, consent, coercion, retaliation, or motive. Those issues require contextual investigation.

The court also held that respondent's allegations sufficiently pleaded claims under the NYSHRL and NYCHRL, including unwanted sexual contact, repeated sexual propositions, sexually explicit remarks, and retaliatory workplace mistreatment. The court further recognized that the Gender-Motivated Violence Act claim was sufficiently pleaded because respondent alleged sexual assault and a pattern of sexual coercion and contact by a superior officer.

That pleading-stage ruling does not prove respondent's allegations. But it confirms that the allegations are legally cognizable, fact-intensive, credibility-dependent, and directly tied to consent, coercion, workplace retaliation, and abuse of authority. The Department should not treat those allegations as mere attachments in an IAB file.

XIV. FAILURE TO INVESTIGATE AND FAILURE TO REASSESS

The central investigative defect is not simply that the Department reached the wrong conclusion. It is that the Department appears to have failed to ask the right questions.

A competent investigation should have addressed:

1. whether Headley sexually assaulted respondent inside NYPD Headquarters on March 14, 2024;
2. whether Headley used Department systems to groom, monitor, or control respondent;
3. whether the November 15, 2023 CPR inquiry was connected to grooming, coercion, or retaliation;
4. whether Headley's complaints to IAB were retaliatory or preemptive;
5. whether Headley's alleged misconduct toward other female officers was part of a pattern;
6. whether Headley's OEE0-related demotion affected her credibility or motive;
7. whether the Department adopted Headley's "stalker" framing before neutral investigation;
8. whether respondent was fully interviewed on her allegations before any "unsubstantiated" closure;
9. whether respondent's legal filing required reopening, reassessment, or supplemental investigation;
10. whether Headley's substantiated CPR misuse was considered in charging respondent with database misuse;
11. whether Redhead's allegations showed improper access to confidential Department information;
12. whether Headley improperly disclosed an active IAB matter;
13. whether the Department considered victim-status protections under Administrative Code § 8-107.1;
14. whether the Department considered retaliation under Administrative Code § 8-107(7); and
15. whether the Department Advocate's continued prosecution relies on an incomplete, Headley-driven record.

If these questions were not asked and answered, the investigation is incomplete.

XV. REQUESTED INVESTIGATIVE RELIEF

Respondent requests that OEI and IAB open, reopen, expand, or supplement all appropriate investigations concerning Headley and the Department's handling of respondent's disciplinary matter. At minimum, respondent requests investigation, review, preservation, and production or disclosure of the following categories:

1. the complete OEE0 file, findings, recommendations, and final disposition that resulted in Headley's demotion effective June 27, 2025;
2. all materials concerning Headley's modified assignment;
3. all materials concerning Headley's substantiated computer misuse involving respondent;
4. all records concerning Headley's CPR inquiry of respondent on November 15, 2023;

5. all audit logs showing Headley's database access concerning respondent, Redhead, Montas, Abdulali, or other related witnesses;
6. all Headley-related sexual harassment, sexual misconduct, coercion, retaliation, stalking, intimidation, abuse-of-authority, or workplace-misconduct complaints involving female members of the service;
7. all materials concerning Headley's alleged misconduct involving respondent;
8. all materials concerning Headley's alleged misconduct involving Redhead, Montas, Abdulali, Plough, Witherspoon, Gilbert, and any other female member of the service identified in the ICMS/IAB file;
9. all records concerning Headley's alleged knowledge of Redhead's modification status, disciplinary history, mental-health-related information, or other confidential personnel information;
10. all records showing whether Headley accessed Department databases concerning Redhead, respondent, Montas, Abdulali, or any related witness;
11. all communications between IAB, OEI, OEEA, DAO, Legal Bureau, the Police Commissioner's Office, and command personnel concerning respondent's Verified Answer with Counterclaims;
12. all records showing whether respondent's legal filing caused any reopening, reassessment, supplemental interview, or reconsideration of the IAB investigation or disciplinary charges;
13. all records explaining why the investigation repeatedly used the term "stalker" before adjudication;
14. all records showing whether Headley's framing was adopted by investigators;
15. all records showing whether respondent was interviewed concerning the March 14, 2024 sexual assault allegation before any "unsubstantiated" closure;
16. all video, access-control, command-log, dormitory, building-entry, tour, assignment, and movement records concerning Headley and respondent on March 14, 2024;
17. all records showing whether Headley's allegations were reviewed for retaliatory motive before Charges and Specifications were issued;
18. all records concerning whether the Department considered Administrative Code § 8-107.1 before relying on Headley-driven allegations;
19. all records concerning whether the Department considered Administrative Code § 8-107(7) before relying on Headley-driven allegations;
20. all records identifying which Headley-related allegations were considered in credibility analysis, mitigation, selective-enforcement review, charging review, or penalty assessment; and
21. all records showing what information was provided to the Department Advocate's Office and Deputy Commissioner-Trials concerning Headley's OEEA history, demotion, computer misuse, subject-officer status, and respondent's legal allegations.

XVI. CONCLUSION

Respondent demands an immediate OEI and IAB investigation into the Department's cover-up of material sexual-misconduct, retaliation, and credibility evidence involving Trevlyn O. Headley.

This is not a routine request for review. The Department had notice of respondent's allegation that Headley sexually assaulted her inside an NYPD Headquarters dormitory room on March 14, 2024. The Department also had evidence that Headley ran respondent in CPR on November 15, 2023, before any sexual contact can fairly be characterized as existing, making that inquiry potential workplace-grooming evidence rather than a mere technical computer violation. The same record identified Headley as a subject officer, documented her OEEA-related demotion, included multiple Headley-connected female

employees and witnesses, and contained respondent's Verified Answer with Counterclaims alleging sexual harassment, coercion, grooming, retaliation, abuse of authority, and misuse of Department processes.

Despite that record, the Department continued to advance a Headley-driven disciplinary prosecution against respondent while repeatedly framing respondent as "Headley's stalker." That framing was not neutral. It adopted the alleged perpetrator's narrative while minimizing evidence that Headley herself may have used Department rank, systems, confidential information, and internal processes to target respondent and influence the disciplinary file.

The cover-up is reflected in the Department's failure to act on what it knew. The Department did not meaningfully investigate the alleged March 14, 2024 sexual assault inside One Police Plaza before continuing the case against respondent. It did not treat respondent's legal filing as requiring a substantive reassessment of Headley's credibility, motive, OEEA history, or role in the charging decision. It did not explain the basis for Headley's demotion or whether that demotion involved sexual harassment, retaliation, or misconduct toward female members of the service. It did not treat Headley's substantiated CPR misuse as evidence of possible grooming, surveillance, or selective enforcement. It did not adequately address Headley's alleged misuse of confidential information concerning Redhead and other female members of the service.

OEI and IAB must investigate the cover-up directly. That investigation must determine who knew about the dormitory sexual-assault allegation, Headley's CPR misuse, Headley's OEEA-related demotion, respondent's legal allegations, and the Headley-connected female witnesses; when they knew it; what they did with that information; and why the Department continued to prosecute respondent without first investigating whether Headley was the sexual abuser, retaliator, and source of a manufactured disciplinary narrative.

Respondent demands that OEI and IAB open or expand the appropriate investigations, preserve all relevant records, interview all necessary witnesses, obtain the complete OEEA and IAB files concerning Headley, investigate the March 14, 2024 dormitory sexual-assault allegation, investigate the November 15, 2023 CPR inquiry as workplace-grooming evidence, investigate Headley's alleged misuse of confidential Department information concerning Redhead and other female members of the service, and issue a written determination identifying who participated in, approved, ignored, minimized, or ratified the cover-up.

Until that investigation is completed, the Department's prosecution of respondent remains what the record shows it to be: retaliatory discipline built on a contaminated file, selective enforcement disguised as accountability, and a cover-up of sexual-misconduct evidence inside the NYPD.

Respectfully submitted,

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