

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
SHATORRA J. FOSTER

Plaintiff,

-against-

Summons

Index No.

Jury Demand

THE CITY OF NEW YORK, JESSICA S. TISCH, and
PSYCHEMEDICS CORPORATION

Defendants
-----X

To the Defendant named above:

You are hereby summoned and required to serve a written answer to the attached Verified Complaint upon the Plaintiff's attorney at the address below.

If this Summons is personally delivered to you within the State of New York, you must serve your answer within twenty (20) days after such service, exclusive of the service date.

If this Summons is served upon you in any other manner authorized by law, you must serve your answer within thirty (30) days after service is complete, as provided by the New York Civil Practice Law and Rules.

Should you fail to appear or answer within the applicable period stated above, judgment may be entered against you by default for the relief demanded in the Verified Complaint, without further notice.

Venue is proper in Bronx County pursuant to CPLR §§ 503(a) and 509 because plaintiff SHATORRA J. FOSTER resides in Bronx County, was working in Bronx County when she received the June 3, 2026 NYPD Medical Division notification directing her to report for a purported random hair drug test, and sustained retaliatory effects and damages in Bronx County.

Venue is further proper because this action arises from retaliatory conduct following plaintiff's protected activity, including her pending counterclaims in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court, New York County, and her related Bronx County retaliation action, *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court, Bronx County.

Dated: June 24, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SHATORRA J. FOSTER

THE SANDERS FIRM, P.C.
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New York, NY 10005
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DEFENDANT ADDRESSES

THE CITY OF NEW YORK
c/o New York City Law Department
Office of the Corporation Counsel
100 Church Street
New York, New York 10007

JESSICA S. TISCH
c/o New York City Police Department
Legal Bureau
One Police Plaza
New York, N.Y. 10038

Defendant PSYCHEMEDICS CORPORATION
Foreign Business Corporation
DOS ID No.: 2292266
Jurisdiction: Delaware
Entity Status: Active
Date of Initial DOS Filing: August 26, 1998
BCL § 1304

c/o C T Corporation System
Registered Agent
28 Liberty Street
New York, New York 10005

Address for Secretary of State service mailing:

PSYCHEMEDICS CORPORATION
DOS ID No.: 2292266
1280 Massachusetts Avenue
Cambridge, Massachusetts 02138

Principal Executive Office:

PSYCHEMEDICS CORPORATION
DOS ID No.: 2292266
1280 Massachusetts Avenue
Cambridge, Massachusetts 02138

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Defendants
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Plaintiff SHATORRA J. FOSTER, by her attorney THE SANDERS FIRM, P.C.,
complaining of defendants THE CITY OF NEW YORK, JESSICA S. TISCH, and
PSYCHEMEDICS CORPORATION, alleges as follows:

INTRODUCTION

This is a retaliation, selective-enforcement, victim-status discrimination, and unlawful employment-testing action arising from the NYPD's decision to subject plaintiff SHATORRA J. FOSTER to a purported "random" hair drug test on June 3, 2026, one day after defendants were served with plaintiff's Bronx County human-rights action.

Before the June 3, 2026 hair test, plaintiff had engaged in extensive protected activity. She asserted counterclaims in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court of the State of New York, County of New York, alleging sexual harassment, sexual coercion, retaliation, abuse of authority, and sexual assault by Trevlyn O. Headley. She also submitted OEI/IAB complaints concerning Headley, investigative contamination, retaliation, selective enforcement, victim-status discrimination, and the Department's failure to investigate or reassess a Headley-driven disciplinary case against her.

On May 31, 2026, plaintiff filed *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court of the State of New York, County of Bronx. That action challenged the Department's adoption, ratification, and preservation of a contaminated disciplinary narrative after the Department's own investigative files showed that Headley was not a neutral complainant, but a subject officer whose credibility, motive, Department-resource access, computer misuse, and alleged sexual misconduct were central to any fair investigation.

On June 2, 2026, plaintiff served the Bronx County action upon the City of New York and multiple NYPD defendants including JESSICA S. TISCH. The next morning, June 3, 2026, while plaintiff was working in Bronx County, she received a telephone call from an unidentified female civilian from NYPD Medical Division directing her to report "ASAP" for a purported "random" drug test.

Plaintiff was not told who ordered, requested, approved, generated, reviewed, or authorized the test. She was not shown any reliable documentation establishing that her selection was generated through a neutral, validated, auditable, and non-retaliatory random-selection process. She was not advised of any reasonable-suspicion basis. She was not provided chain-of-custody documentation, laboratory paperwork, random-selection records, testing authority, completed forms, or any NYPD/Psychedics test result.

At approximately 1100 hours on June 3, 2026, plaintiff reported to 1 Lefrak City, Queens, New York, where NYPD personnel collected three samples of her head hair. Defendant PSYCHEMEDICS CORPORATION tested, processed, analyzed, interpreted, and/or reported plaintiff's June 3, 2026 NYPD hair sample. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH have not provided plaintiff with the Psychedics result, laboratory report,

chain-of-custody documentation, cutoff thresholds, testing data, interpretive materials, or related documentation.

Because plaintiff believed the timing and circumstances were retaliatory, she obtained an independent outside hair test later that same day at The IMA Group, 3250 Westchester Avenue, Suite 12, Bronx, New York 10461. The independent five-panel hair test was negative. Plaintiff alleges, upon information and belief, that the June 3, 2026 NYPD/Psychemedics hair-test result was also negative because plaintiff was not suspended, modified, charged, or otherwise disciplined based upon that test result.

This action does not depend upon a positive test result. The retaliatory injury began when defendants THE CITY OF NEW YORK and JESSICA S. TISCH selected, summoned, compelled, processed, and subjected plaintiff to an unreliable, opaque, and inadequately validated hair-testing regime under circumstances supporting retaliatory motive. The testing machinery itself was used to intimidate, burden, discredit, monitor, or chill plaintiff after protected activity.

Defendants THE CITY OF NEW YORK and JESSICA S. TISCH used, maintained, supplied, supported, or benefited from a hair-testing regime that does not satisfy *Frye*, the Uniform Guidelines on Employee Selection Procedures, or basic requirements of scientific reliability, job-relatedness, validation, neutral selection, fair application, adverse-impact monitoring, and meaningful review. The Department's label of "random" does not insulate the test from scrutiny where it occurred one day after service of a human-rights lawsuit and after extensive protected activity.

Plaintiff's claims against PSYCHEMEDICS CORPORATION arise from its role in testing plaintiff's hair and participating in, supporting, defending, or benefiting from the hair-

testing regime used by the NYPD in employment, disciplinary, medical, promotional, and personnel contexts. Under *Landon v. Kroll Laboratory Specialists, Inc.*, 22 N.Y.3d 1 (2013), a drug-testing laboratory may owe a duty of care to the subject of a drug test where its testing and reporting foreseeably causes serious consequences to that individual.

Plaintiff brings this action under the New York State Human Rights Law, the New York City Human Rights Law, and New York common law to recover damages, attorneys' fees, costs, interest, declaratory relief, injunctive relief, and all other legal and equitable relief available by law.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to Article VI of the New York State Constitution, the New York State Human Rights Law, Executive Law § 290 et seq., the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq., and the common law of the State of New York.

2. This Court has personal jurisdiction over defendants THE CITY OF NEW YORK and JESSICA S. TISCH pursuant to CPLR §§ 301 and 302 because they reside in, are domiciled in, are employed in, conduct business in, exercise official authority in, and/or committed acts or omissions complained of within the State of New York.

3. This Court has personal jurisdiction over defendant PSYCHEMEDICS CORPORATION pursuant to CPLR §§ 301 and 302 because it transacts business in the State of New York, contracts with or provides services to New York governmental entities, supplies hair drug-testing services used in New York employment and disciplinary matters, derives revenue from New York-based testing activity, and/or committed acts or omissions causing injury to plaintiff within the State of New York.

4. Venue is proper in Bronx County pursuant to CPLR §§ 503(a) and 509 because plaintiff SHATORRA J. FOSTER resides in Bronx County.

5. Venue is further proper in Bronx County because plaintiff was working in Bronx County at 350 Marconi Street when she received the June 3, 2026 NYPD Medical Division telephone notification directing her to report “ASAP” for a purported random hair drug test.

6. Venue is also proper in Bronx County because plaintiff experienced retaliatory effects, employment consequences, emotional distress, reputational harm, and damages in Bronx County.

7. Venue is additionally proper because this action arises from retaliatory conduct following plaintiff’s protected activity, including her pending counterclaims in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court of the State of New York, County of New York, and her related Bronx County retaliation action, *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court of the State of New York, County of Bronx.

8. Although the NYPD Medical Division testing site is located in Queens County and relevant Department decision-making, notification, service, and command activity also occurred in New York County, plaintiff properly selects Bronx County based upon her residence, work location at the time of notification, damages sustained in Bronx County, and the related pending Bronx County retaliation action.

PROCEDURAL REQUIREMENTS

9. Plaintiff SHATORRA J. FOSTER has satisfied all conditions precedent to the commencement of this action, or such conditions have been waived, excused, satisfied by defendants’ conduct, or are not required.

10. Plaintiff SHATORRA J. FOSTER asserted formal legal claims concerning Trevlyn O. Headley's alleged sexual harassment, sexual coercion, retaliation, abuse of authority, and sexual assault in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court of the State of New York, County of New York, by filing a Verified Answer with Counterclaims on June 27, 2025.

11. Plaintiff SHATORRA J. FOSTER further engaged in protected activity by placing the Department on notice through the Trial Commissioner's Office, the Department Advocate's Office, the Internal Affairs Bureau record, including IAB Log No. 2026-18936, counsel's supplemental communications, the May 27, 2026 disclosure of Special Investigations Unit and Prosecutorial Wall materials, and the Department's own internal files concerning Headley's alleged misconduct, the Department's failure to investigate FOSTER'S counterclaims, and the Department's continued disciplinary prosecution of FOSTER.

12. Plaintiff SHATORRA J. FOSTER further supplemented the Department's internal record concerning the matters alleged herein, including through notice to the Internal Affairs Bureau concerning the May 27, 2026 disclosures, the SIU and PW materials, Headley's alleged misconduct, the Department's failure to investigate FOSTER'S counterclaims, and the Department's continued disciplinary prosecution of FOSTER.

13. On May 31, 2026, plaintiff SHATORRA J. FOSTER commenced *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court of the State of New York, County of Bronx, challenging the Department's adoption, ratification, and preservation of a contaminated Headley-driven disciplinary narrative.

14. On June 2, 2026, plaintiff served the Bronx County action upon the City of New York and multiple NYPD defendants.

15. On June 3, 2026, one day after service of the Bronx County action, plaintiff was directed by NYPD Medical Division to report “ASAP” for a purported “random” hair drug test.

16. Plaintiff alleges that the June 3, 2026 hair drug test was retaliatory, selectively enforced, unsupported by reliable random-selection documentation, and imposed after defendants were on notice of plaintiff’s protected activity.

17. No notice of claim is required for plaintiff SHATORRA J. FOSTER’S claims brought pursuant to the New York State Human Rights Law, Executive Law § 290 et seq., or the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq.

18. No administrative exhaustion requirement bars plaintiff’s claims under the New York State Human Rights Law, the New York City Human Rights Law, or New York common law.

19. To the extent defendants THE CITY OF NEW YORK, JESSICA S. TISCH, or PSYCHEMEDICS CORPORATION contend that any additional procedural requirement applies, such requirement has been satisfied, waived, excused, rendered unnecessary, or is inapplicable based upon the nature of the claims asserted herein.

20. This action has been commenced within the applicable statutes of limitation for all claims asserted herein.

PLAINTIFF

21. Plaintiff SHATORRA J. FOSTER is a uniformed member of the New York City Police Department.

22. At all relevant times, FOSTER was employed by the New York City Police Department and assigned to Department commands, offices, or units within New York City.

23. FOSTER resides in Bronx County.

24. FOSTER engaged in protected activity under the New York State Human Rights Law and the New York City Human Rights Law by asserting claims, counterclaims, complaints, and outcries concerning sexual harassment, sexual coercion, retaliation, abuse of authority, sexual assault, victim-status discrimination, investigative contamination, selective enforcement, and misuse of Department processes.

25. FOSTER asserted formal legal claims concerning Trevlyn O. Headley's alleged sexual harassment, sexual coercion, retaliation, abuse of authority, and sexual assault in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court of the State of New York, County of New York.

26. FOSTER later commenced *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court of the State of New York, County of Bronx, challenging the Department's adoption, ratification, and preservation of a contaminated Headley-driven disciplinary narrative.

27. FOSTER received a purported "random" hair drug test directive on June 3, 2026, one day after service of the Bronx County human-rights action upon the City of New York and multiple NYPD defendants.

28. FOSTER alleges that the June 3, 2026 hair drug test was retaliatory, selectively enforced, unsupported by reliable random-selection documentation, and imposed because of, or in response to, her protected activity.

29. FOSTER further alleges that defendants used an unreliable, scientifically disputed, and inadequately validated hair-testing regime as an employment and disciplinary tool to intimidate, burden, discredit, or chill her protected activity.

30. FOSTER brings this action to redress retaliation, selective enforcement, victim-status discrimination, unlawful employment testing, aiding and abetting, interference, and the retaliatory use of a purported random hair drug test after she complained of and litigated sexual harassment, sexual assault, retaliation, and investigative misconduct.

DEFENDANTS

31. Defendant THE CITY OF NEW YORK is a municipal corporation organized and existing under the laws of the State of New York.

32. At all relevant times, THE CITY OF NEW YORK operated, managed, supervised, controlled, and was legally responsible for the New York City Police Department, including its Medical Division, Internal Affairs Bureau, Department Advocate's Office, Trial Commissioner's Office, and drug-testing, disciplinary, investigative, and personnel processes.

33. THE CITY OF NEW YORK is named because plaintiff alleges that the NYPD subjected her to a purported "random" hair drug test on June 3, 2026, one day after service of her Bronx County human-rights action, and after the Department was already on notice of her protected activity.

34. Defendant JESSICA S. TISCH is the Police Commissioner of the City of New York.

35. TISCH is sued in her official and individual capacities.

36. At all relevant times, TISCH possessed final policymaking authority over the NYPD, including authority over discipline, personnel practices, internal investigations, Medical Division practices, drug testing, employment testing, and the use of Department processes against uniformed members of the service.

37. Pursuant to New York City Administrative Code § 14-115, TISCH is legally responsible for the government, administration, disposition, and discipline of the Department and its members.

38. TISCH is named because plaintiff alleges that the June 3, 2026 hair drug test occurred within a department structure under her command and after the Department was placed on notice of plaintiff's protected activity, related litigation, and allegations of retaliatory Department conduct.

39. Defendant PSYCHEMEDICS CORPORATION is a corporation that provides, markets, administers, analyzes, interprets, defends, validates, or promotes hair drug-testing services.

40. At all relevant times, PSYCHEMEDICS CORPORATION contracted with, provided services to, supplied testing to, advised, supported, benefited from, or otherwise participated in the NYPD's hair-testing regime.

41. PSYCHEMEDICS CORPORATION knew or should have known that its hair-testing services were used by the NYPD in employment, disciplinary, medical, promotional, and personnel contexts affecting uniformed members of the service.

42. PSYCHEMEDICS CORPORATION is named because plaintiff alleges that it participated in, supplied, promoted, defended, or benefited from a hair-testing regime used by the NYPD as an unreliable, unvalidated, and retaliatory employment practice.

43. PSYCHEMEDICS CORPORATION owed plaintiff a duty of care because it knew or should have known that its testing services, results, documentation, and interpretations could foreseeably cause serious employment, disciplinary, reputational, emotional, and economic consequences to the tested individual.

BACKGROUND

44. This action arises from the retaliatory use by defendants THE CITY OF NEW YORK and JESSICA S. TISCH of the NYPD's hair drug-testing regime against plaintiff SHATORRA J. FOSTER on June 3, 2026.

45. Before the June 3, 2026 hair drug test, plaintiff engaged in protected activity under the New York State Human Rights Law and the New York City Human Rights Law.

46. On or about June 27, 2025, plaintiff asserted counterclaims in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court of the State of New York, County of New York.

47. Those counterclaims concerned Trevlyn O. Headley's alleged sexual harassment, sexual coercion, retaliation, abuse of authority, and sexual assault.

48. Plaintiff also made protected complaints, outcries, and disclosures to the NYPD concerning Headley, investigative contamination, retaliation, selective enforcement, victim-status discrimination, and the Department's failure to investigate or reassess a Headley-driven disciplinary case against her.

49. Defendant THE CITY OF NEW YORK, through the NYPD, the Department Advocate's Office, the Trial Commissioner's Office, the Internal Affairs Bureau, the Office of Equity and Inclusion, the Medical Division, and other Department actors, had notice of plaintiff's protected activity before June 3, 2026.

50. Defendant JESSICA S. TISCH, as Police Commissioner and final policymaker for the NYPD, knew or should have known that plaintiff had engaged in protected activity before June 3, 2026.

51. On or about May 27, 2026, the Department disclosed Special Investigations Unit and Prosecutorial Wall materials in the pending Department disciplinary matter against plaintiff.

52. Plaintiff alleges that those materials confirmed that the Department possessed information showing that Headley was not a neutral complainant.

53. Plaintiff alleges that those materials showed that Headley was a subject officer whose credibility, motive, Department-resource access, computer misuse, workplace conduct, alleged sexual misconduct, and treatment of women were central to any fair investigation.

54. After the May 27, 2026 disclosures, plaintiff, through counsel, placed the Department, IAB, DAO, OEI, and other Department actors on further notice that the Department's continued prosecution of plaintiff was retaliatory, selectively enforced, victim-status insensitive, and contaminated by Headley-related misconduct.

55. On or about May 31, 2026, plaintiff commenced *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court of the State of New York, County of Bronx.

56. The Bronx County action alleged that the Department adopted, preserved, and ratified a contaminated disciplinary narrative against plaintiff while minimizing or failing to investigate Headley-related misconduct.

57. On or about June 2, 2026, plaintiff served the Bronx County action upon defendant THE CITY OF NEW YORK.

58. On or about June 2, 2026, plaintiff also served the Bronx County action upon multiple NYPD defendants including JESSICA S. TISCH through the NYPD Legal Bureau.

59. Defendant THE CITY OF NEW YORK therefore had formal litigation notice of plaintiff's Bronx County retaliation action before the June 3, 2026 hair drug test.

60. Defendant TISCH, through the NYPD command structure, Legal Bureau, Medical Division, IAB, DAO, Trial Commissioner's Office, and other Department actors, knew or should have known that plaintiff had served the Bronx County action before the June 3, 2026 hair drug test.

61. The next morning, June 3, 2026, while plaintiff was working at 350 Marconi Street in Bronx County, she received a telephone call from an unidentified female civilian from NYPD Medical Division.

62. The Medical Division caller told plaintiff that her name had "popped" for a "random" drug test.

63. The Medical Division caller directed plaintiff to report "ASAP" for testing.

64. Defendant THE CITY OF NEW YORK, through NYPD Medical Division and related Department personnel, caused plaintiff to be summoned for the June 3, 2026 hair drug test.

65. Defendant THE CITY OF NEW YORK did not tell plaintiff who ordered, requested, approved, authorized, generated, or reviewed the June 3, 2026 test directive.

66. Defendant THE CITY OF NEW YORK did not tell plaintiff whether the test directive came from Medical Division, IAB, DAO, Personnel Bureau, plaintiff's command, the Police Commissioner's Office, or another Department source.

67. Defendant THE CITY OF NEW YORK did not provide plaintiff with any written notice establishing that her selection was random.

68. Defendant THE CITY OF NEW YORK did not provide plaintiff with any list, log, audit trail, algorithmic record, random-selection record, timestamp, approval record, or

command record showing that her selection was generated through a neutral and non-retaliatory process.

69. Defendant THE CITY OF NEW YORK did not advise plaintiff of any reasonable-suspicion basis for the test.

70. Defendant THE CITY OF NEW YORK did not identify any fact, incident, observation, allegation, medical concern, disciplinary concern, or workplace concern supporting drug testing.

71. Defendant THE CITY OF NEW YORK did not provide plaintiff with any documentation showing that the June 3, 2026 test was unrelated to her protected activity.

72. Defendant THE CITY OF NEW YORK did not provide plaintiff with any documentation showing that the June 3, 2026 test was unrelated to her New York County counterclaims, OEI/IAB complaints, DAO-related protected activity, May 27, 2026 disclosures, Bronx County action, or June 2, 2026 service of process.

73. Defendant THE CITY OF NEW YORK compelled plaintiff to leave her Bronx County assignment and report to NYPD Medical Division at 1 Lefrak City, Queens, New York.

74. At approximately 1100 hours on June 3, 2026, NYPD personnel collected three samples of plaintiff's head hair.

75. Defendant THE CITY OF NEW YORK, through NYPD personnel, required plaintiff to provide identifying information and medication information as part of the testing process.

76. Defendant THE CITY OF NEW YORK, through NYPD personnel, required plaintiff to sign an envelope containing her hair sample and laboratory paperwork.

77. Defendant THE CITY OF NEW YORK did not provide plaintiff with a copy of the random-selection record.

78. Defendant THE CITY OF NEW YORK did not provide plaintiff with a copy of the alleged selection list.

79. Defendant THE CITY OF NEW YORK did not provide plaintiff with a copy of the chain-of-custody documentation.

80. Defendant THE CITY OF NEW YORK did not provide plaintiff with a copy of the laboratory paperwork.

81. Defendant THE CITY OF NEW YORK did not provide plaintiff with a copy of any completed forms.

82. Defendant THE CITY OF NEW YORK did not provide plaintiff with a copy of the testing authority.

83. Defendant THE CITY OF NEW YORK did not identify the laboratory or vendor that would test plaintiff's sample.

84. Defendant THE CITY OF NEW YORK did not identify the cutoff thresholds, testing matrix, testing panel, laboratory method, screening method, confirmatory method, or interpretive standard that would be applied.

85. Defendant THE CITY OF NEW YORK did not provide plaintiff with any NYPD test result.

86. Plaintiff immediately believed that the timing and circumstances of the purported random hair drug test were retaliatory.

87. Plaintiff believed the test was connected to her protected activity, including her New York County counterclaims, OEI/IAB complaints, DAO-related protected activity, May 27, 2026 disclosures, Bronx County human-rights action, and June 2, 2026 service of process.

88. Later that same day, at approximately 1427 hours, plaintiff obtained an independent outside hair test at The IMA Group, 3250 Westchester Avenue, Suite 12, Bronx, New York 10461.

89. Plaintiff's independent outside test was a five-panel hair test.

90. Plaintiff's independent outside hair test was negative.

91. Defendant THE CITY OF NEW YORK did not meaningfully reconcile its June 3, 2026 hair-testing directive with plaintiff's same-day negative independent hair test.

92. Defendant THE CITY OF NEW YORK did not provide plaintiff with any post-test explanation, correction, documentation, result, or assurance that the June 3, 2026 test would not be used against her.

93. Defendant TISCH failed to ensure that the Department's drug-testing process was not used against plaintiff in retaliation for protected activity.

94. Defendant TISCH failed to ensure that the Department preserved, produced, or disclosed records establishing that plaintiff's June 3, 2026 selection was random, neutral, auditable, and unrelated to her protected activity.

95. Defendant TISCH failed to ensure that the Department's Medical Division, IAB, DAO, Trial Commissioner's Office, Personnel Bureau, and related Department actors did not use Department processes to intimidate, burden, discredit, or chill plaintiff after she filed and served human-rights claims.

96. Defendant TISCH failed to prevent, correct, or remedy the retaliatory use of a purported random hair drug test after plaintiff had placed the Department on notice of sexual harassment, sexual assault, retaliation, victim-status discrimination, selective enforcement, investigative contamination, and abuse of authority.

97. Defendant TISCH maintained, authorized, permitted, or ratified the NYPD's continued use of hair testing as an employment, disciplinary, medical, and personnel practice despite known concerns concerning reliability, validation, disparate impact, transparency, and random-selection safeguards.

98. Defendant TISCH further maintained, authorized, permitted, or ratified a department structure in which members of the service may be compelled to submit to hair testing without being provided selection records, chain-of-custody documentation, laboratory paperwork, cutoff thresholds, vendor information, test results, or meaningful procedures to challenge retaliatory selection.

99. Defendant PSYCHEMEDICS CORPORATION tested, processed, analyzed, interpreted, and/or reported plaintiff's June 3, 2026 NYPD hair sample.

100. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not provide plaintiff with the Psychemedics result, laboratory report, chain-of-custody documentation, cutoff thresholds, testing data, interpretive materials, or related documentation.

101. Plaintiff alleges, upon information and belief, that the June 3, 2026 Psychemedics/NYPD hair-test result was negative because plaintiff was not suspended, modified, charged, or otherwise disciplined based upon that test result.

102. Plaintiff further alleges that, even if the June 3, 2026 hair-test result was negative, the selection, summons, compelled testing, collection, processing, and concealment of the result

constituted retaliatory conduct because defendants THE CITY OF NEW YORK and JESSICA S. TISCH used the testing machinery itself to intimidate, burden, discredit, monitor, or chill plaintiff after protected activity.

103. Plaintiff alleges that the injury did not depend upon a positive test result.

104. Plaintiff alleges that the injury began when defendants THE CITY OF NEW YORK and JESSICA S. TISCH selected, summoned, compelled, processed, and subjected plaintiff to an unreliable, opaque, and inadequately validated hair-testing regime under circumstances supporting retaliatory motive.

105. PSYCHEMEDICS CORPORATION knew or should have known that its hair-testing services were used by the NYPD in employment, disciplinary, medical, promotional, and personnel contexts affecting uniformed members of the service.

106. PSYCHEMEDICS CORPORATION knew or should have known that its testing services, results, documentation, methods, cutoff thresholds, laboratory protocols, and interpretations could foreseeably cause serious employment, disciplinary, reputational, emotional, and economic consequences to tested individuals.

107. PSYCHEMEDICS CORPORATION knew or should have known that hair testing presents serious scientific-reliability, validation, contamination, matrix, chain-of-custody, disparate-impact, job-relatedness, and fair-application concerns.

108. PSYCHEMEDICS CORPORATION knew or should have known that hair testing may be affected by collection site, hair type, hair color, hair texture, melanin concentration, environmental contamination, passive exposure, washing protocols, laboratory thresholds, chain of custody, and interpretation standards.

109. PSYCHEMEDICS CORPORATION knew or should have known that marijuana hair testing presents heightened concerns because marijuana exposure may involve passive smoke, environmental transfer, surface contamination, or trace exposure that does not establish knowing ingestion, workplace impairment, or misconduct.

110. PSYCHEMEDICS CORPORATION nevertheless tested plaintiff's hair and participated in the NYPD hair-testing regime without adequate validation, transparency, sample-integrity safeguards, adverse-impact monitoring, or meaningful employee review.

111. Plaintiff alleges that the NYPD's drug-testing program includes hair testing and related screening or confirmatory methods, including radioimmunoassay of hair ("RIAH"), enzyme immunoassay ("EIA"), gas chromatography/mass spectrometry ("GC/MS"), gas chromatography-tandem mass spectrometry ("GC-MS/MS"), liquid chromatography-tandem mass spectrometry ("LC-MS/MS"), or other related testing methods.

112. Plaintiff alleges that defendants THE CITY OF NEW YORK and JESSICA S. TISCH used, maintained, supplied, supported, or benefited from a disputed hair-testing process as an employment and disciplinary tool without adequate validation, transparency, random-selection safeguards, sample-integrity protections, adverse-impact monitoring, or meaningful review.

113. Plaintiff alleges that the NYPD has not produced or disclosed any adequate validation study demonstrating that its use of hair testing, including RIAH, EIA, or related hair-testing variants, is job-related and consistent with business necessity for NYPD employment, disciplinary, medical, or personnel decisions.

114. Plaintiff alleges that the NYPD has not produced or disclosed any adequate adverse-impact analysis assessing whether its drug-testing program disproportionately affects members of protected classes by race, ethnicity, gender, national origin, or other protected status.

115. Plaintiff alleges that the NYPD's purported random-selection system has not been adequately validated for neutrality, bias, manipulation, selective enforcement, retaliation, or disparate impact.

116. Plaintiff alleges that the absence of transparent random-selection records is especially significant here because plaintiff was directed to report for a purported random hair drug test one day after service of her Bronx County human-rights action.

117. Plaintiff alleges that the Substance Abuse and Mental Health Services Administration has not adopted final mandatory guidelines authorizing hair testing as a federally approved workplace drug-testing matrix.

118. Plaintiff alleges that SAMHSA's non-adoption of hair testing reflects continuing concerns regarding contamination, washing procedures, racial and ethnic disparities, and the inability to distinguish ingestion from external exposure without adequate safeguards.

119. Plaintiff alleges that defendants THE CITY OF NEW YORK and JESSICA S. TISCH failed to ensure that the hair-testing regime used against her satisfied *Frye*, the Uniform Guidelines on Employee Selection Procedures, and basic requirements of scientific reliability, job-relatedness, validation, neutral selection, and fair application.

120. Plaintiff alleges that defendants THE CITY OF NEW YORK and JESSICA S. TISCH's conduct would deter a reasonable employee from engaging in protected activity.

121. Plaintiff alleges that defendants THE CITY OF NEW YORK and JESSICA S. TISCH's conduct constituted retaliation, selective enforcement, victim-status discrimination,

aiding and abetting, interference, negligence, and the unlawful use or support of an unreliable and inadequately validated employment-testing practice.

CONCLUSION

122. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not merely require plaintiff SHATORRA J. FOSTER to submit to a routine workplace procedure. They subjected her to a purported “random” hair drug test one day after service of her Bronx County human-rights action, after extensive protected activity, and without providing reliable documentation showing that the selection was neutral, random, auditable, validated, or unrelated to her protected activity.

123. Plaintiff alleges that Defendants THE CITY OF NEW YORK and JESSICA S. TISCH used the NYPD’s hair-testing regime as a retaliatory employment and disciplinary tool to burden, intimidate, monitor, discredit, or chill her after she complained of sexual harassment, sexual assault, retaliation, victim-status discrimination, selective enforcement, and investigative misconduct.

124. Accordingly, plaintiff seeks all damages, declaratory relief, injunctive relief, attorneys’ fees, costs, interest, and all other legal and equitable relief available under the New York State Human Rights Law, the New York City Human Rights Law, and New York common law.

VIOLATIONS AND CLAIMS ALLEGED

COUNT I

Retaliation

New York State Human Rights Law

Executive Law § 296(7)

Against Defendants THE CITY OF NEW YORK and JESSICA S. TISCH

125. Plaintiff repeats and realleges the preceding paragraphs as if fully set forth herein.

126. FOSTER engaged in protected activity under the New York State Human Rights Law by asserting counterclaims in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court of the State of New York, County of New York.

127. FOSTER further engaged in protected activity by making complaints, outcries, disclosures, and legal challenges concerning sexual harassment, sexual assault, retaliation, victim-status discrimination, selective enforcement, investigative contamination, and misuse of Department processes.

128. FOSTER further engaged in protected activity by submitting OEI/IAB complaints, placing the Department Advocate's Office and Trial Commissioner's Office on notice of retaliatory and contaminated Department conduct, and commencing *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court of the State of New York, County of Bronx.

129. On or about June 2, 2026, FOSTER served the Bronx County human-rights action upon defendant THE CITY OF NEW YORK and multiple NYPD defendants including JESSICA S. TISCH.

130. On or about June 3, 2026, one day after service of the Bronx County action, defendants THE CITY OF NEW YORK and JESSICA S. TISCH, through the NYPD Medical Division and related Department actors, caused FOSTER to be summoned for a purported "random" hair drug test.

131. defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not provide FOSTER with documentation establishing that her selection was random, neutral, validated, auditable, or unrelated to her protected activity.

132. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not provide FOSTER with the random-selection record, selection list, audit trail, approval record, chain-of-custody documentation, laboratory paperwork, cutoff thresholds, testing data, interpretive materials, or NYPD/Psychomedics test result.

133. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH used the purported “random” hair drug test to intimidate, burden, monitor, discredit, or chill FOSTER after she engaged in protected activity.

134. The conduct of defendants’ THE CITY OF NEW YORK and JESSICA S. TISCH would deter a reasonable employee from engaging in protected activity.

135. The conduct of defendants’ THE CITY OF NEW YORK and JESSICA S. TISCH was causally connected to FOSTER’S protected activity, including by temporal proximity, notice, sequence of events, retaliatory context, and the absence of disclosed documentation establishing a neutral and non-retaliatory selection process.

136. Defendant TISCH participated in, approved, authorized, permitted, failed to prevent, failed to correct, or ratified the retaliatory use of the NYPD’s hair-testing regime against FOSTER.

137. As a direct and proximate result of the conduct of defendants’ THE CITY OF NEW YORK and JESSICA S. TISCH, FOSTER suffered damages, including emotional distress, humiliation, reputational harm, loss of dignity, fear of further retaliation, interference with protected activity, litigation-related harm, and other compensable injuries.

COUNT II

Retaliation

New York City Human Rights Law

Administrative Code § 8-107(7)

Against Defendants THE CITY OF NEW YORK and JESSICA S. TISCH

138. Plaintiff repeats and realleges the preceding paragraphs as if fully set forth herein.

139. FOSTER engaged in protected activity under the New York City Human Rights Law by asserting counterclaims in *Headley v. City of New York, et al.*, Index No. 155228/2025, Supreme Court of the State of New York, County of New York.

140. FOSTER further engaged in protected activity by making complaints, outcries, disclosures, and legal challenges concerning sexual harassment, sexual assault, retaliation, victim-status discrimination, selective enforcement, investigative contamination, and misuse of Department processes.

141. FOSTER further engaged in protected activity by submitting OEI/IAB complaints, placing the Department Advocate's Office and Trial Commissioner's Office on notice of retaliatory and contaminated Department conduct, and commencing *Foster v. City of New York, et al.*, Index No. 810713/2026E, Supreme Court of the State of New York, County of Bronx.

142. On or about June 2, 2026, FOSTER served the Bronx County human-rights action upon defendant THE CITY OF NEW YORK and multiple NYPD defendants including JESSICA S. TISCH.

143. On or about June 3, 2026, one day after service of the Bronx County action, defendants THE CITY OF NEW YORK and JESSICA S. TISCH, through NYPD Medical Division and related Department actors, caused FOSTER to be summoned for a purported "random" hair drug test.

144. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not provide FOSTER with documentation establishing that her selection was random, neutral, validated, auditable, or unrelated to her protected activity.

145. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH did not provide FOSTER with the random-selection record, selection list, audit trail, approval record, chain-of-custody documentation, laboratory paperwork, cutoff thresholds, testing data, interpretive materials, or NYPD/Psychomedics test result.

146. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH used the purported “random” hair drug test to intimidate, burden, monitor, discredit, or chill FOSTER after she engaged in protected activity.

147. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH’s conduct was reasonably likely to deter a person from opposing discrimination, reporting sexual harassment or sexual assault, disclosing retaliation or investigative misconduct, filing human-rights claims, serving legal process, or challenging misuse of Department authority.

148. Defendants THE CITY OF NEW YORK and JESSICA S. TISCH’s conduct was causally connected to FOSTER’S protected activity, including by temporal proximity, notice, sequence of events, retaliatory context, and the absence of disclosed documentation establishing a neutral and non-retaliatory selection process.

149. Defendant TISCH participated in, approved, authorized, permitted, failed to prevent, failed to correct, or ratified the retaliatory use of the NYPD’s hair-testing regime against FOSTER.

150. As a direct and proximate result of defendants’ retaliation, FOSTER suffered damages, including emotional distress, humiliation, reputational harm, loss of dignity, fear of further retaliation, interference with protected activity, litigation-related harm, and other compensable injuries.

COUNT III
Negligent Testing, Negligent Reporting, Negligent Documentation, and Negligent
Interpretation Under New York Common Law
Against Defendant PSYCHEMEDICS CORPORATION

151. Plaintiff repeats, realleges, and incorporates by reference all preceding paragraphs as though fully set forth herein.

152. Defendant PSYCHEMEDICS CORPORATION owed plaintiff SHATORRA J. FOSTER a duty of care in the testing, handling, interpretation, documentation, reporting, and preservation of records concerning the biological sample attributed to plaintiff.

153. Under *Landon v. Kroll Laboratory Specialists, Inc.*, 22 N.Y.3d 1 (2013), a drug-testing laboratory may owe a direct duty of care to the subject of a drug test where the laboratory tests the individual's biological specimen and the foreseeable consequences of negligent testing, negligent reporting, negligent documentation, or negligent interpretation are direct and serious.

154. FOSTER was the subject of the June 3, 2026 NYPD hair drug test.

155. PSYCHEMEDICS CORPORATION tested, processed, analyzed, interpreted, and/or reported FOSTER'S June 3, 2026 NYPD hair sample.

156. PSYCHEMEDICS CORPORATION knew or should have known that its testing, reporting, documentation, interpretation, and laboratory records would be used by the NYPD in connection with FOSTER'S employment, disciplinary status, duty status, reputation, credibility, assignments, and continued service.

157. PSYCHEMEDICS CORPORATION knew or should have known that NYPD hair-test results and related laboratory documentation could foreseeably cause serious employment, disciplinary, reputational, emotional, and economic harm to the tested member of the service.

158. PSYCHEMEDICS CORPORATION also knew or should have known that, where a uniformed member has recently engaged in protected activity, opaque testing, incomplete documentation, delayed reporting, or non-disclosure of results may foreseeably intensify the retaliatory, coercive, reputational, and emotional harm caused by the testing process.

159. PSYCHEMEDICS CORPORATION knew or should have known that hair testing presents serious scientific, procedural, and interpretive concerns, including issues involving collection site, hair type, hair color, hair texture, melanin concentration, environmental contamination, passive exposure, washing protocols, cutoff thresholds, chain of custody, sample identity, and interpretation standards.

160. PSYCHEMEDICS CORPORATION knew or should have known that marijuana hair testing presents heightened concerns because marijuana exposure may involve passive smoke, environmental transfer, surface contamination, or trace exposure that does not establish knowing ingestion, workplace impairment, or misconduct.

161. PSYCHEMEDICS CORPORATION had notice from prior litigation, regulatory concerns, scientific literature, and its own work with police departments that hair testing may raise employment-discipline, contamination, validation, proof-of-ingestion, and human-rights concerns.

162. PSYCHEMEDICS CORPORATION breached its duty of care by testing, processing, interpreting, reporting, documenting, preserving, or transmitting FOSTER'S June 3, 2026 hair-test materials without adequate safeguards to ensure transparency, sample integrity, reliable interpretation, complete documentation, and meaningful review.

163. PSYCHEMEDICS CORPORATION further breached its duty by failing to ensure that complete laboratory documentation, chain-of-custody materials, cutoff thresholds, testing data, interpretive materials, and reporting records were preserved, available, and capable of meaningful review.

164. Defendants did not provide FOSTER with the PSYCHEMEDICS result, laboratory report, chain-of-custody documentation, cutoff thresholds, testing data, interpretive materials, or related documentation.

165. Plaintiff alleges, upon information and belief, that the June 3, 2026 PSYCHEMEDICS/NYPD hair-test result was negative because FOSTER was not suspended, modified, charged, or otherwise disciplined based upon that test result.

166. Even if the June 3, 2026 PSYCHEMEDICS/NYPD result was negative, PSYCHEMEDICS CORPORATION'S negligent testing, reporting, documentation, interpretation, preservation, or non-disclosure contributed to the harm caused by the retaliatory testing process.

167. The harm to FOSTER was not remote, speculative, or attenuated because FOSTER'S own biological sample was the subject of the test, and PSYCHEMEDICS CORPORATION knew or should have known that its testing and reporting would be used by the NYPD in an employment and disciplinary context.

168. As a direct and proximate result of PSYCHEMEDICS CORPORATION'S negligence, FOSTER suffered emotional distress, humiliation, reputational harm, fear of discipline, loss of dignity, interference with protected activity, litigation-related harm, and other damages.

169. Plaintiff is entitled to compensatory damages, consequential damages, interest, costs, disbursements, and such other and further relief as this Court deems just and proper.

JURY TRIAL

170. Plaintiff SHATORRA J. FOSTER hereby demands a trial by jury of all issues so triable as of right.

PRAYER FOR RELIEF

WHEREFORE, plaintiff SHATORRA J. FOSTER respectfully demands judgment against defendants THE CITY OF NEW YORK, JESSICA S. TISCH, and PSYCHEMEDICS CORPORATION, jointly and severally where permitted by law, as follows:

- a. Declaring that the conduct of defendants' THE CITY OF NEW YORK and JESSICA S. TISCH violated the New York State Human Rights Law, Executive Law § 290 et seq.;
- b. Declaring that the conduct of defendants' THE CITY OF NEW YORK and JESSICA S. TISCH violated the New York City Human Rights Law, Administrative Code of the City of New York § 8-101 et seq.;
- c. Declaring that the conduct of defendants' THE CITY OF NEW YORK and JESSICA S. TISCH retaliatory selection, summons, compelled testing, processing, and non-disclosure of plaintiff's June 3, 2026 NYPD/Psychedics hair drug-test result violated plaintiff's rights;
- d. Declaring that the use of RIAH, EIA, enzyme immunoassay testing, radioimmunoassay testing, or any other variant of immunoassay-based hair testing as an employment, disciplinary, medical, promotional, applicant-screening, probationary-employment, or personnel device without adequate

scientific reliability, job-relatedness, validation, adverse-impact monitoring, neutral selection, chain-of-custody safeguards, sample-integrity protections, and meaningful review violates applicable law;

- e. Enjoining defendants THE CITY OF NEW YORK and JESSICA S. TISCH, and all persons acting in concert with them, from retaliating against plaintiff for engaging in protected activity;
- f. Enjoining defendants THE CITY OF NEW YORK and JESSICA S. TISCH, and all persons acting in concert with them, from selecting, summoning, compelling, directing, processing, or subjecting plaintiff to any future drug test in retaliation for protected activity;
- g. Enjoining defendants THE CITY OF NEW YORK, JESSICA S. TISCH, PSYCHEMEDICS CORPORATION, and all persons acting in concert with them, from using, administering, supplying, processing, reporting, relying upon, defending, or benefiting from RIAH, EIA, enzyme immunoassay testing, radioimmunoassay testing, or any other variant of immunoassay-based hair testing against plaintiff unless and until defendants demonstrate that such testing satisfies *Frye*, the Uniform Guidelines on Employee Selection Procedures, job-relatedness, business necessity, neutral selection, adverse-impact monitoring, sample-integrity safeguards, chain-of-custody reliability, and meaningful review protections;
- h. Enjoining defendants THE CITY OF NEW YORK, JESSICA S. TISCH, PSYCHEMEDICS CORPORATION, and all persons acting in concert with them, from using RIAH, EIA, enzyme immunoassay testing,

radioimmunoassay testing, or any other variant of immunoassay-based hair testing as an employment, disciplinary, medical, promotional, applicant-screening, probationary-employment, or personnel device against NYPD applicants, probationary employees, uniformed members of the service, or civilian employees unless and until defendants demonstrate that such testing satisfies *Frye*, the Uniform Guidelines on Employee Selection Procedures, job-relatedness, business necessity, neutral selection, adverse-impact monitoring, sample-integrity safeguards, chain-of-custody reliability, and meaningful review protections;

- i. Enjoining defendants THE CITY OF NEW YORK and JESSICA S. TISCH from selecting plaintiff, NYPD applicants, probationary employees, uniformed members of the service, or civilian employees for purported random drug testing without preserving reliable documentation showing that any such selection was neutral, random, auditable, non-retaliatory, and free from selective enforcement;
- j. Directing defendants THE CITY OF NEW YORK and JESSICA S. TISCH to produce to plaintiff all records concerning the June 3, 2026 test, including the random-selection record, selection list, audit trail, approval record, notification record, chain-of-custody documentation, laboratory report, Psychomedics result, cutoff thresholds, testing data, interpretive materials, quality-control records, and all related communications;
- k. Directing defendants THE CITY OF NEW YORK and JESSICA S. TISCH to remove, seal, segregate, or otherwise prevent use of any record suggesting that

plaintiff was subjected to the June 3, 2026 hair drug test for legitimate disciplinary, medical, reasonable-suspicion, or non-retaliatory reasons unless defendants produce competent documentation establishing such basis;

- l. Awarding plaintiff compensatory damages for emotional distress, humiliation, reputational harm, loss of dignity, fear of discipline, interference with protected activity, litigation-related harm, and all other compensable injuries;
- m. Awarding plaintiff punitive damages against all defendants against whom such damages are legally recoverable;
- n. Awarding plaintiff pre-judgment and post-judgment interest;
- o. Awarding plaintiff reasonable attorneys' fees, costs, and disbursements; and
- p. Granting such other and further legal, equitable, declaratory, injunctive, and monetary relief as this Court deems just, proper, and equitable.

Dated: June 24, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SHATORRA J. FOSTER

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ATTORNEY VERIFICATION

STATE OF NEW YORK

ss:

COUNTY OF WESTCHESTER

ERIC SANDERS, ESQ., affirms as follows:

I am an attorney admitted to practice in the State of New York courts. As the attorney for the plaintiff in the action, I am familiar with all the facts and circumstances.

The Verified Complaint is true to the knowledge of the affirmant, except for those matters stated to be alleged upon information and belief, and he believes those matters to be factual.

The affirmant further states that this verification is made by the affirmant and not by the Plaintiff because the Plaintiff is not within the county of Westchester, where the affirmant maintains his office.

The undersigned attorney affirms that the previous statements are true under the penalties of perjury pursuant to CPLR 2106.

Dated: June 24, 2026
New York, N.Y.

Respectfully submitted,

By: s/Eric Sanders
Attorney for Plaintiff SHATORRA J. FOSTER

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

INDEX NO.:

SHATORRA J. FOSTER

Plaintiff,

-against-

THE CITY OF NEW YORK, JESSICA S. TISCH, and
PSYCHEMEDICS CORPORATION

Defendants

SUMMONS WITH VERIFIED COMPLAINT

Duly submitted by:

By: s/Eric Sanders

Attorney for Plaintiff SHATORRA J. FOSTER

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