



POLICE DEPARTMENT
DEPARTMENT ADVOCATE'S OFFICE
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June 24, 2026

Rosemarie Maldonado, Esq.
Deputy Commissioner - Trials
One Police Plaza – 9th Floor
New York, New York 10038

Re: NYPD v. Police Officer Shatorra Foster
Disciplinary Case No. C-030622

Dear Commissioner:

The Department respectfully submits a Motion *in Limine* in the above-captioned matter, as follows:

The *Charges and Specifications* served on Police Officer Shatorra Foster in Disciplinary Case No. C-030622 allege specific acts of misconduct by Police Officer (then Probationary Detective) Foster. The Department respectfully submits that the Court preclude Respondent from introducing any evidence of collateral issues at trial which do not bear directly upon a valid defense to the *Charges and Specifications* or, in the alternative, that Respondent be required to satisfy the Court with an Offer of Proof – in advance of any witness testimony -- regarding the relevance of any such evidence to any valid defense to the *Charges and Specifications*. The Department respectfully further urges that any such evidence offered by Respondent not be deemed admissible merely because it is offered as generically related to “witness credibility” without specifically establishing its relevance to the issues to be decided by the Court.

Respectfully submitted,

David H. Green

David H. Green
Agency Attorney
Department Advocate's Office

cc: Eric Sanders, Esq.