



ABRENIO LAW

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VIA Email

Loudoun County Sherriff's Office
c/o FOIA Officer

FOIA REQUEST & RECORDS PRESERVATION REQUEST

RE: Car Accident Records
My Client:
Date of Accident:
Location:
Time:

Local case No:

Dear Representative:

I represent _____, an injury victim, regarding her accident as specified above. This case was investigated by **Investigator** _____ and he completed an accident report. **I've attached that report to this letter.**

This accident ultimately led to the at fault driver being charged and prosecuted for his behavior that caused this crash. **Further, it is my understanding that this case is now closed given that the party charged was convicted in his absence on October 8, 2021. And, therefore, there is no ongoing prosecution.**

As such, pursuant to Code Section 2.2-3700, et. seq., I'm writing to make a formal FOIA request for the full investigative file in this case. Pursuant to that code, I would define the investigative file to include, but not limited to, the following:

- Complaints
- Court Orders
- Memorandum
- Notes
- Incident Reports
- Filings through any incident-based reporting system
- Diagrams
- Maps
- Photographs/video
- Correspondence
- Reports
- Witness Statements
- Evidence (trial exhibits, etc.)

Additionally, I'm requesting all **CAD Records** and **911 Phone Records**, which relate to this incident. **I am willing to pay fees for this request up to a maximum of \$60.00. If you estimate that the fees will exceed this limit, please inform me first.**

In addition to requesting these records, I'm also writing to notify you that these same records may become important during litigation in this matter. **Given that, I'm requesting that the original records, unredacted, be immediately preserved for at least three (3) years.** Given that the personal injury statute of limitations in Virginia is two (2) years, we may need to ultimately subpoena the unredacted records in the future.

Given that, I'd also request that you confirm that these records are being preserved pursuant to this request.

Sincerely,



James S. Abrenio