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June 27, 2025

***Via US Certified, US regular, Fax***

Madison Police Department

211 S. Carroll St.

Madison, WI 53703

Regarding: 1234

Location of Incident: 220 E Lakelawn Pl, Madison, WI 53703

Date of Incident: 2025-02-14 00:00:00

To Whom It May Concern:

Our law firm Stinar Gould Grieco & Hensley, PLLC represents 1234 regarding a claim stemming from an incident on 2025-02-14 00:00:00, that took place at the 220 E Lakelawn Pl, Madison, WI 53703. Upon information and belief, 1234 A woman and her friends were walking in the street after a party when she was hit by a snowplow, resulting in her being trapped under the vehicle. She sustained a severely broken clavicle, significant bruising on her back, multiple cuts on her legs, and continues to discover additional minor injuries.

Pursuant to the provisions of the Freedom of Information Act, 5 ILCS 140/1, I am requesting information related to the incident that resulted in 1234 being injured.

We are requesting, among other things:

* + Any and all incident reports related to the snowplow accident involving the client, including the initial accident report, police or first responder reports, and any witness statements or interviews conducted as part of the investigation.  
    Any and all photographs, videos, surveillance footage, or imaging depicting the incident, or the snowplow involved immediately prior to, during, or immediately following the incident.  
    Any and all correspondence, emails, call logs, call recordings, or other documents regarding the incident from the responding officers or within the Municipal Police Department.  
    Any and all records of the snowplow driver's communication with the police department, including transcripts or recordings of the 911 call, dispatch logs, or other related records.  
    Any and all records of the responding officers' actions at the scene, including notes, reports, or other documentation of their interactions with the client, the snowplow driver, or other witnesses.  
    Any and all records of any field sobriety tests, breathalyzer tests, or other impairment checks conducted on the snowplow driver at the scene.  
    Any and all records of any citations, charges, or other legal actions taken against the snowplow driver as a result of the incident.  
    Any and all records of the snowplow's location and speed immediately prior to the incident, as recorded by any GPS or tracking systems in use by the Municipal Police Department or the snowplow's operator.  
    Any and all video footage or surveillance records, including any available dashcam or bodycam footage from the responding officers, or footage from nearby traffic or security cameras.  
    Any and all internal communications within the Municipal Police Department regarding the incident, including emails, memos, or other correspondence discussing the accident, the response, or any subsequent investigation or legal actions.  
    Any and all records, reports, correspondence, or other documentation concerning any prior incidents or complaints involving the snowplow driver or the specific snowplow involved in the incident.  
    Any and all records related to the training and qualifications of the snowplow driver, including any certifications, licenses, or other documentation of his ability to safely operate the snowplow.  
    Any and all records of the Municipal Police Department's policies and procedures for responding to pedestrian accidents, and any records indicating whether these policies and procedures were followed in this case.  
    Any and all maintenance logs for the snowplow involved in the accident, including records of inspections, repairs, modifications, or other maintenance activities.  
    Any and all records related to the communication between the Municipal Police Department and third parties (including but not limited to the snowplow operator, local municipalities, or other agencies) concerning the incident.

I look forward to receiving your written response within five working days, as required by the Act. Should you need further information, please do not hesitate to contact me directly. I can be reached via email at Mike@SGGHLaw.com or by phone at (312) 728-7444. Thank you for your prompt attention and cooperation.

Sincerely,

|  |
| --- |
| /s/ *Michael R. Grieco* |

Michael R. Grieco

**STINAR GOULD GRIECO & HENSLEY**

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