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June 26, 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

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, that took place at the 220 E Lakelawn Pl, Madison, WI 53703. Upon information and belief, 1234 The client was struck by a snowplow while walking in the street after a daytime party, resulting in her being pinned beneath the vehicle and sustaining a severely broken clavicle, significant back bruising, multiple leg cuts, and other minor injuries. The incident was reported to the police by the snowplow driver, and the client believes it may have been captured on a nearby sorority house's security camera, which she is attempting to obtain footage from for evidence.

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 initial accident reports, police or first responder reports, internal documentation concerning the accident, and any witness statements or interviews conducted as part of the investigation.  
    Any and all photographs, videos, body cam footage, or surveillance footage depicting the incident, or the snowplow involved in the incident immediately prior to, during, or immediately following the incident.  
    Any and all correspondence, filings, emails, call logs, call recordings, complaints or other documents regarding the safety of or hazards imposed by the snowplow or the driver involved.  
    Any and all communication records related to the incident, including emails, letters, or internal memoranda, as well as correspondence between the police department and any other involved parties regarding the incident.  
    Any and all data on snowplow operations at the time of the incident, including records of snowplow speeds and scheduled operations, as well as any reports of delays or deviations from normal operations near the incident location.  
    Any and all video footage or surveillance records, including any available dashcam or bodycam footage related to the accident.  
    Any and all records, reports, correspondence, or other documentation concerning other similar incidents or injuries involving snowplows within the jurisdiction of the police department.  
    Any and all records related to the training and qualification of the snowplow driver involved in the incident.  
    Any and all maintenance logs for the snowplow involved in the incident, including records of inspections, repairs, modifications, or other maintenance activities conducted by or reported to the police department.  
    Any and all records related to the communication between the police department and third parties (including but not limited to the snowplow driver, the client, or other agencies) concerning the incident.  
    Any and all documents or records concerning the jurisdictional responsibility of the police department for investigating and responding to such incidents.

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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