



COMMONWEALTH of VIRGINIA

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December 20, 2017

The Honorable Llezelle Agustin Dugger
Clerk of Circuit Court
City of Charlottesville Circuit Court
315 East High Street
Charlottesville, VA 22902

Re: JACOBSEN & LANDERS v. CHARLOTTESVILLE POLICE
DEPARTMENT, VIRGINIA DEPARTMENT OF STATE POLICE,
AND VIRGINIA OFFICE OF THE SECRETARY OF PUBLIC SAFETY
AND HOMELAND SECURITY
Case No. CL 17-592

Dear Ms. Dugger:

Enclosed please find a Response to Petitioners' Amended Petition for Writ of Mandamus on behalf of the Virginia Department of State Police and Secretary of Public Safety and Homeland Security. Could you please file it in the above matter.

Additionally, could you please stamp filed on the enclosed copy and return it to my office using the enclosed stamped envelope?

Thank you very much for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Jagels".

Michael A. Jagels
Senior Assistant Attorney General

cc: Caitlin Vogus, Esq.
Richard Milnor, Esq.
Lisa Robertson, Esq.

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

NATALIE JACOBSEN and JACKSON LANDERS,)
Petitioners,)
)
v.)
)
CHARLOTTESVILLE POLICE DEPARTMENT)
Chief Al S. Thomas Jr.)
606 East Market Street)
Charlottesville, VA 22902)
)
DEPARTMENT OF STATE POLICE)
Colonel W. Steven Flaherty)
7700 Midlothian Turnpike)
North Chesterfield, VA 23235)
)
OFFICE OF THE SECRETARY OF)
PUBLIC SAFETY AND HOMELAND SECURITY)
Brian Moran)
Patrick Henry Building)
1111 East Broad Street)
Richmond, VA 23219)
)
Respondents.)

Case No. CL17-592

**RESPONDENTS DEPARTMENT OF STATE POLICE AND
SECRETARY OF PUBLIC SAFETY AND HOMELAND SECURITY'S JOINT
RESPONSE TO PETITIONER'S AMENDED PETITION FOR WRIT OF MANDAMUS**

Comes now the Department of State Police and Office of the Secretary of Public Safety and Homeland Security and submit the following joint response to Petitioner's Amended Petition for Writ of Mandamus. On November 7, 2017, this Court held a hearing and heard arguments from all parties on Petitioners' Petition for Writ of Mandamus. Following the hearing, this Court issued an order permitting Petitioners to file an amended petition to respond to arguments made in the parties' response to the writ as well as arguments made in court. Petitioners' Amended Petition for Writ of Mandamus did not address either the Respondents' response filed on

November 6, 2017, nor Respondents' arguments made in Court on November 7, 2017. Therefore, Respondents Department of State Police and Secretary of Public Safety and Homeland Security continue to rely on their previous filing in response to the Writ of Mandamus.

CONCLUSION

For the reasons stated in their initial Response to Petitioners' Writ of Mandamus, the Secretary of Public Safety and Homeland Security and the Department of State Police respectfully request that this Court DENY and DISMISS the Amended Petition for a Writ of Mandamus.

Respectfully submitted,

SECRETARY OF PUBLIC SAFETY AND
HOMELAND SECURITY; and

THE VIRGINIA DEPARTMENT OF
STATE POLICE, Respondents.,

By: 
Counsel

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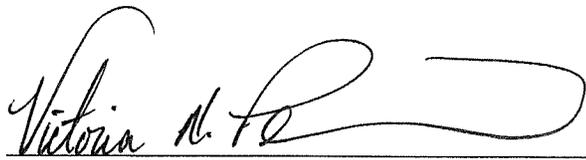
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 20th day of December, 2017, a true copy of the foregoing Response to the Amended Petition for a Writ of Mandamus was emailed and mailed, postage prepaid, to counsel for the Petitioners and the City of Charlottesville Police Department:

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