

## Patrick M. Regan

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Board Certified, Civil Trials, National Board of Trial Advocacy Admitted in DC, VA and MD

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March 16, 2022

By Email: bos@loudoun.gov

UPS-Next Day

Ms. Phyllis J. Randall Chair At-Large Loudoun County Board of Supervisors 1 Harrison Street, SE, 5th Floor Leesburg, VA 20175

Re: Estate of Regina E. Redman-Lollobrigido

Dear Ms. Randall:

Please be advised that this law firm represents the Estate of Regina E. Redman-Lollobrigido, deceased, in connection with the legal claims for damages stemming from Ms. Redman-Lollobrigido's brutal death as the result of an assault that took place on September 19, 2021. The facts of this extremely violent assault and death are described in more detail in the attached articles.

Pursuant to Virginia Code § 15.2-209, this letter constitutes formal notice that Ms. Mellanie Cromwell, Individually, as Personal Representative of the Estate of Regina E. Redman-Lollobrigido, and on behalf of all wrongful death beneficiaries, hereby intends to pursue all appropriate legal claims against Loudoun County, the Loudoun County Sheriff's Department, the Loudoun County Department of Community Corrections, and/or any other Loudoun County governmental agencies that may have been involved in any aspect of, or had responsibility for, monitoring and supervising Peter Lollobrigido.

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Two months prior to the death of Ms. Redman-Lollobrigido, in July 2021, Peter Lollobrigido was arrested for abduction, strangulation, and assault in connection with repeated violent actions he had taken against his wife, Ms. Redman-Lollobrigido. As a result of his arrest, a pre-trial hearing was held on July 30, at which time the court released Mr. Lollobrigido on bond, with specific restrictions for the sole purpose of safeguarding Ms. Redman-Lollobrigido, including the requirement to wear an ankle monitor and a Protective Order to stay away from his wife. Pursuant to the express terms of his release from custody, Loudoun County, through its employees and/or agents, including those of the Loudoun County Sheriff's Department, the Loudoun County Department of Community Corrections, and/or others, was required to appropriately supervise and monitor Peter Lollobrigido to ensure that he complied with the terms of his release as ordered by the court.

Loudoun County, through its employees and agents, including the Loudoun County Sheriff's Department, the Loudoun County Department of Community Corrections, and potentially other Loudoun County departments and/or agencies, negligently, carelessly and/or willfully/intentionally failed to properly supervise and monitor Peter Lollobrigido in order to ensure that he was in full compliance with the terms of his release. Among other things, Loudoun County failed to properly: program the GPS ankle tracker, use the GPS ankle tracker, monitor the whereabouts of Peter Lollobrigido, supervise Mr. Lollobrigido, and comply with the specific terms of Mr. Lollobrigido's release. Tragically, the failures of Loudoun County to comply with the specific terms of Peter Lollobrigido's release directly led to and caused the violent death of Ms. Redman-Lollobrigido.

As referenced earlier in this letter, we intend to pursue all appropriate legal claims, including negligence, gross negligence, violation of civil rights, willful and wanton reckless disregard stemming from the tragic death of Ms. Redman-Lollobrigido.

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Please forward this correspondence to the appropriate risk management or liability insurance representatives and request that they contact my office.

Sincerely,

Patrick M. Regan

PMR/ek

Enclosures

cc:

Sheriff Michael L. Chapman

Mr. Terry Sullivan, Director

Department of Community Corrections

