

VIRGINIA:

IN THE CIRCUIT COURT OF LOUDOUN COUNTY

DAVID C. GRUSCH)
 Plaintiff,)
 v.)
 JANE DOE,)
 Individually and officially,)
 and)
 MICHAEL L. CHAPMAN)
 Individually and officially,)
 Defendants.)

Case No. CL24-4023

2024 JUL 16 P 2:11
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 CIRCUIT COURT
 CLERK'S OFFICE
 LOUDOUN COUNTY, VA
 TESTER: 2 D.C.

Serve:
Michael L. Chapman
 Loudoun County Sheriff Dept.
 803 Sycolin Road
 Leesburg, VA 20175

COMPLAINT

COMES NOW the Plaintiff, **DAVID C. GRUSCH** (hereinafter, "Plaintiff" or "Grusch"), by and through undersigned Counsel, and files this Complaint, jointly and severally, against **JANE DOE** (hereinafter, "Defendant Doe"), in his/her official and individual capacity, and **SHERIFF MICHAEL L. CHAPMAN** (hereinafter, "Defendant" or "Defendant Chapman"), in his official and individual capacity, and in support thereof, states as follows:

PARTIES

- At all relevant times, Plaintiff Grusch was a domiciliary of the Commonwealth of Virginia. Grusch is a former United States Air Force Officer, former United States Intelligence Officer, maintains a Top-Secret government security clearance.

2. At all relevant times, Defendant Sheriff Michael Chapman was the Loudoun County Sheriff, acting under the color of law, to wit, under the color of the statutes, ordinances, regulations, policies, customs, and usages of the Commonwealth of Virginia and/or Loudoun County. Sheriff Chapman has responsibility over the policies and procedures of the deputy sheriff officers under the employ of the Loudoun County Sheriff's Office (hereinafter, "LCSO" or "Sheriff's Office"). Sheriff Chapman is directly responsible for the deputy sheriffs employed by the LCSO as their employment is based on Defendant's discretionary appointment.
3. Upon information and belief, "Jane Doe" is a governmental employee for the Loudoun County Sheriff's Office and was acting under the color law, to wit, under the color of the statutes, ordinances, regulations, policies, customs, and usages of the Commonwealth of Virginia and/or Loudoun County, and was the party responsible for releasing the Plaintiff's Records (*see, infra*).

JURISDICTION AND VENUE

4. Jurisdiction is proper in the Circuit Court of Loudoun County because pursuant to Section 17.1-513 of the Code of Virginia, this is a case at law greater than \$25,000.00, and pursuant to Section 8.01-328.1 of the Code of Virginia, Defendant violated state law and committed tortious conduct in the County of Loudoun.
5. Venue is proper in Loudon County because Plaintiff's claim arose from unlawful conduct occurring in Loudoun County, Virginia.

STATEMENT OF FACTS

6. Upon information and belief, Defendant Doe was a designated FOIA official for the Loudoun County Sheriff's Office, with the requisite training in the proper procedures to handle FOIA

requests, including appropriate and specialized training on dissemination, withholding, and redacting of records covered under Virginia's Freedom of Information Act.

7. Upon information and belief, Defendant Chapman trained Defendant Jane Doe on all the requisite policies and procedures, including, but not limited to, the Law Enforcement Guide to Virginia Freedom of Information Act and Va. Code §§§ 2.2-3705.5(6)), 2.2-3705.1(1), and 37.2-818(B), regarding disclosure of information pursuant to Virginia's Freedom of Information Act prior to **OCTOBER 1, 2018**.
8. On or about **OCTOBER 1, 2018**, Grusch was admitted to Loudoun Adult Medical Psychiatric Services (hereinafter, "LAMPS") under an Emergency Custody Order (hereinafter, "ECO").
9. LAMPS was, and continues to be, located within the Commonwealth of Virginia (Loudoun County).
10. On or about **OCTOBER 1, 2018**, Grusch was the subject of a Petition for Involuntary Admission, or otherwise known as a Temporary Detention Order (hereinafter, "TDO") in LAMPS.
11. Sensitive medical records, documents, reports, dispositional orders, and the like (hereinafter, "Records") were included in Grusch's TDO file.
12. Grusch was not committed and was, consequently, released.
13. At no point did Grusch waive confidentiality of the Records associated with his involuntary admission into LAMPS.
14. Approximately four (4) years later, on or about **MAY 2022**, Grusch filed a whistleblower complaint with the U.S. Office of the Intelligence Community Inspector General (hereinafter, "ICIG") to support his effort to share classified information with the U.S. Senate Select Committee on Intelligence.

15. On or about **JULY 19, 2022**, the ICIG found Grusch's whistleblower complaint to be credible and urgent and transmitted it to the United States Senate Select Committee on Intelligence (hereinafter, "SSCI") and the House Permanent Select Committee on Intelligence (hereinafter, "HPSCI").
16. On or about **JULY 26, 2023**, Grusch made national news when he testified before the United States House of Representatives regarding said whistleblower complaint.
17. Grusch's whistleblower claim is pending as of the date of this Complaint.
18. On or about **JULY 30, 2023**, Ken Klippenstein (hereinafter, "Klippenstein") of the news organization "The Intercept" submitted a Virginia Freedom of Information Act (FOIA) request (hereinafter, "Request") to the Sheriff's Office requesting, among other things:
 - i. "all CADs, Calls for service, Call Detail Records, Incident History Reports, and related police reports" for Grusch's two previous addresses from **MARCH 2014** through **NOVEMBER 2019**; and
 - ii. "all records related to David Grusch as either a witness, victim, suspect or 911 complainant at any address from January 1, 2013, to July 30, 2023."
19. Upon information and belief, on or about **AUGUST 3, 2023**, Defendant Jane Doe of the Loudoun County Sheriff's Office provided Klippenstein with an incident report which contained a significant amount of highly sensitive, personal information pertaining to Grusch's personal and medical history related to Grusch's **OCTOBER 1, 2018** involuntary commitment.
20. The incident report described in detail facts that led to Grusch's ECO and subsequent TDO and further contained a detailed narrative of events from Loudoun County Sheriff's Deputy Lewis R. McClenahan.

21. On or about **AUGUST 9, 2023**, Klippenstein published an article in The Intercept (hereinafter, “Article”) detailing Grusch’s **OCTOBER 1, 2018** involuntary admission that led to his TDO, the execution of said TDO and ECO, and Grusch’s medical treatment at LAMPS.
22. Since the publication of the Article, Grusch suffered and continues to suffer personally and professionally.
23. Grusch now brings this Complaint against the Defendants jointly and severally.

LEGAL AUTHORITY

Absolute v. Qualified Immunity

24. If the employee is a high-level governmental official, he is absolutely immune while acting in his official capacity and no other factors need to be considered. Messina v. Burden, 228 Va. 301.
25. Other government employees and officials have qualified immunity depending on the function they perform and the manner of performance. *Id.*
26. “Qualified immunity balances two important interests—the need to hold public officials accountable when they exercise power irresponsibly and the need to shield officials from harassment, distraction, and liability when they perform their duties reasonably.” Pearson v. Callahan, 555 U.S. 223.
27. Whether a public official “may be held personally liable for an allegedly unlawful official action generally turns on the ‘objective legal reasonableness’ of the action, assessed in light of the legal rules that were ‘clearly established’ at the time it was taken.” Anderson v. Creighton, 483 U.S. 635 (1987).

28. The qualified immunity doctrine protects government officials from ambiguity or haziness in the state of the law, and ensures that they are “on notice their conduct is unlawful” before they are subjected to suit. Saucier v. Katz, 533 U.S. 194 (2001).
29. Government employees are not entitled to immunity when they engage in gross or willful and wanton negligence, and neither are they entitled to immunity when they act beyond the scope of their employment, exceeding their authority and discretion. James v. Jane, 221 Va. 43, 53, 282 S.E.2d 864, 869 (1980).
30. Courts have established a four-factor test for determining whether sovereign immunity applies [to non-high-level government employees]. *Id.* These factors are: (1) the nature of the function performed by the employee; (2) the extent of the state's interest and involvement in the function; (3) the degree of control and direction exercised by the state over the employee; and (4) whether the act complained of involved the use of judgment and discretion. *Id.*
31. Although Virginia’s sheriffs fall within the doctrine of sovereign immunity generally applicable to other state officials (Heider v. Clemons, 241 Va. 143), such doctrine is not available to Sheriff Chapman in this case.

Vicarious Liability of Sheriff

32. In Virginia the relationship between a sheriff and his deputies is significantly different from the relationship between other state officers and their employees. Courts have ruled that the sheriff shall answer civilly for all the acts of his deputies. James v. M’Cubbin, 6 Va. 273 (1800).
33. There is a difference between master and servant; but a sheriff and all his officers are considered as one person. Miller v. Jones, 50Va. 584 (1853).

34. The law looks upon the sheriff and his officers as one person: he is to look to his officers that they do their duty; for if they transgress, he is answerable to the party injured by such transgression; and his officers are answerable to him. Moore's dm'r v. Dawney and Another, 13 Va. 127 (1808).
35. On principles of public policy, the liability of a sheriff for his deputy is much more extensive than the general law regarding a master/servant relationship. "The acts and de faults of the deputy, color officii, are considered in law as the acts and defaults of the sheriff, who is liable therefor [sic] in the same form of action as if they had been actually committed by himself. Mosby v. Mosby, 50 Va. 584 (1853).
36. The sheriff [is] answerable in an action of trespass vi et armis for the act of his officer, the law looking up on the sheriff and all his officers as one person: he is to look at his officers that do their duty; for if they transgress, he is answerable to the party injured by such transgression, and his officers are answerable over him. There is a difference between master and servant; but a sheriff and all his officers are considered, in cases like this, as one person. *Id.*
37. Applying Virginia law, the United States District Court for the Eastern District of Virginia found Miller still controlling law and held that a sheriff may be held vicariously liable for his deputies' acts if they were acting *colore officii*. Acts taken *colore officii* are an [o]fficer's acts unauthorized by his position, though done in form that purports that acts are done by official duty and by virtue of office. White v. Chapman, 119 F. Supp. 3d 420 (E.D. Va. 2015).

Exceptions to Sovereign Immunity, generally.

38. Exceptions to the doctrine of sovereign immunity are acts that are grossly negligent (Messina), intentional torts (Tomlin v. McKenzie, 251 Va. 478), acts characterized by bad

faith (Fox v. Deese, 234 Va. 412), and/or statutory waivers. (Ligon v. County of Goochland, 279 Va. 312).

39. Governmental employees are not entitled to sovereign immunity for intentional torts whether they act within or without the scope of their authority. Fox v. Deese, 234 Va. 412.

Statutory Exception to Sovereign Immunity

40. “The following information contained in a public record *is excluded* from the mandatory disclosure provisions of this chapter but may be disclosed by the custodian in his discretion, *except where such disclosure is prohibited by law...* (6) Reports and court documents *relating to involuntary admission* required to be kept confidential pursuant to § 37.2-818.” Va. Code § 2.2-3705.5 (6) (Emphasis Added.). **(VIRGINIA FOIA)**.

41. “The following information contained in a public record *is excluded* from the mandatory disclosure provisions of this chapter but may be disclosed by the custodian in his discretion, *except where such disclosure is prohibited by law...* Personnel information concerning identifiable individuals, except that access shall not be denied to the person who is the subject thereof.” Va. Code § 2.2-3705.1 (1) (Emphasis Added.). **(VIRGINIA FOIA)**.

42. As it pertains to TDO reports, Virginia Code states, “such recordings, records, reports, and documents **shall not** be subject to the Virginia Freedom of Information Act (§ 2.2-3700, *et. seq.*)” Va. Code § 37.2-818 (B). **(HEARINGS FOR INVOLUNTARY ADMISSIONS)**

Intentional Tort/Gross Negligence Exception to Sovereign Immunity

43. Gross negligence is a degree of negligence showing indifference to another and an utter disregard of the prudence that amounts to a complete neglect of the safety of such other person. Gross negligence is more than simple and ordinary negligence but less than willful or reckless

conduct. Specifically, gross negligence is a degree of negligence showing an indifference to another's safety and/or well-being. See, Commonwealth v. Giddens, 295 Va. 607, 613 (2018).

- i. Gross negligence includes the following elements: (1) duty; (2) breach of the duty; (3) causation; and (4) damages. *See Id.*

44. Willful or wanton conduct is defined as an action undertaken in conscious disregard of the rights of another or with reckless indifference to the consequences of which the defendant was aware, from his/its knowledge of existing circumstances and conditions that his/its conduct probably would cause injury to another. Miller v. P.G. Christ, Inc., 297 Va. 604, 637 (2019).

- i. Willful and wanton negligence includes the following elements: (1) duty; (2) breach of the duty; (3) causation; and (4) damages. *See Id.*

COUNT I:
VIOLATION OF VIRGINIA CODE § 2.2-3705.5(6)
(All Defendants)

45. This Count hereby incorporates the preceding and subsequent paragraphs of this Complaint by reference.

46. Plaintiff brings this claim against all Defendants, jointly and severally, for violations of the Virginia Freedom of Information Act (Va. Code § 2.2-3705.5(6)) (*see, supra*).

- i. "...the court shall keep its copies of recordings made pursuant to this section, relevant medical records, reports, and court documents pertaining to the hearings provided for in this chapter confidential... Such recordings, records, reports, and documents *shall not be subject to the Virginia Freedom of Information Act* (§ 2.2-3700 et seq.)." Va. Code § 37.2-818.
- ii. "(6) Reports and court documents relating to involuntary admission *required to be kept confidential pursuant to § 37.2-818.*" Va. Code § 2.2-3705.5 (6).

47. Plaintiff brings this Count against Defendant Jane Doe directly and via vicarious liability against Defendant Chapman.
48. Under Va. Code § 2.2-3705.5(6), the Defendants had no authority to exercise discretion when releasing information relating to Plaintiff's involuntary admission records, reports, and/or documents.
49. The Defendants violated Va. Code § 2.2-3705.5(6) by disclosing "reports... relating to involuntary admission" to Klippenstein of the Intercept which were incorporated into court documents/reports related to Grusch's ECO and TDO. The disclosure to Klippenstein was prohibited by law.
50. As a direct and proximate cause actions of the Defendants, Grusch has sustained and continues to sustain personal damage and professional damage.

WHEREFORE, on **COUNT I**, the Plaintiff respectfully request that this Court grant the following relief jointly and severally:

- i. Damages from all Defendants in the amount up to \$2,084,999.98;
- ii. Court costs in bringing this action;
- iii. Attorney fees;
- iv. Pre-and-post-judgment interest at the judgment rate; and/or
- v. Such other relief as this Honorable Court deems just and proper.

COUNT II:
VIOLATION OF VIRGINIA CODE § 2.2-3705.1(1)
(All Defendants)

51. This Count hereby incorporates the preceding and subsequent paragraphs of this Complaint by reference.

52. Plaintiff brings this claim against all Defendants, jointly and severally, for violating the Virginia Freedom of Information Act (Va. Code § 2.2-3705.1(1)).
53. Plaintiff brings this Count against Defendant Jane Doe directly and via vicarious liability against Defendant Chapman.
54. The following information contained in a public record is excluded from the mandatory disclosure provisions of this chapter but may be disclosed by the custodian in his discretion, *except where such disclosure is prohibited by law...* Personnel information concerning identifiable individuals, except that access shall not be denied to the person who is the subject thereof. Va. Code § 2.2-3705.1(1) (Emphasis Added.).
55. Under Va. Code § 2.2-3705.1(1), the Defendants had no authority to exercise discretion when releasing information relating to Plaintiff's personnel information.
56. The Defendants violated Va. Code § 2.2-3705.1(1) because it disclosed "personnel information" concerning Grusch, who is an "identifiable individual," to Klippenstein of the Intercept. The disclosure to Klippenstein was prohibited by law.
57. As a direct and proximate cause actions of the Defendants, Grusch has sustained and continues to sustain personal damage and professional damage.

WHEREFORE, on **COUNT II**, the Plaintiff respectfully request that this Court grant the following relief jointly and severally:

- i. Damages from all Defendants in the amount up to \$2,084,999.98;
- ii. Court costs in bringing this action;
- iii. Attorney fees;
- iv. Pre-and-post-judgment interest at the judgment rate; and/or
- v. Such other relief as this Honorable Court deems just and proper.

COUNT III:
VIOLATION OF VIRGINIA § 37.2-818(B)
(All Defendants)

58. This Count hereby incorporates the preceding and subsequent paragraphs of this Complaint by reference.

59. Plaintiff brings this claim against all Defendants, jointly and severally, for violating the Virginia Behavioral Health and Developmental Services Act (Va. Code § 37.2-818(B)).

60. Plaintiff brings this Count against Defendant Jane Doe directly and via vicarious liability against Defendant Chapman.

61. Under the Virginia Behavioral Health and Developmental Services Act, “such recordings, records, reports, and documents [i.e. commitment hearing and involuntary admission records] shall not be subject to the Virginia Freedom of Information Act (§ 2.2-3700 et seq.)” Va. Code § 37.2-818(B).

62. Under Va. Code § 37.2-818(B), the Defendants had no authority to exercise discretion when releasing information relating to Plaintiff’s commitment hearing and involuntary admission to Klippenstein.

63. The Defendants violated Va. Code § 37.2-818(B) because it disclosed information related to Plaintiff’s commitment hearing and involuntary admission to Klippenstein of the Intercept. The disclosure to Klippenstein was prohibited by law.

64. As a direct and proximate cause actions of the Defendants, Grusch has sustained and continues to sustain personal damage and professional damage.

WHEREFORE, on **COUNT III**, the Plaintiff respectfully request that this Court grant the following relief jointly and severally:

- i. Damages from all Defendants in the amount up to \$2,084,999.98;

- ii. Court costs in bringing this action;
- iii. Attorney fees;
- iv. Pre-and-post-judgment interest at the judgment rate; and/or
- v. Such other relief as this Honorable Court deems just and proper.

COUNT IV:
GROSS NEGLIGENCE
(All Defendants)
(Pleaded in the alternative)

65. This Count hereby incorporates the preceding and subsequent paragraphs of this Complaint by reference.
66. Plaintiff brings this Count in the alternative against all Defendants, jointly and severally, for gross negligence.
67. Plaintiff brings this claim against Defendant Jane Doe directly and via vicarious liability against Defendant Chapman.
68. Gross negligence is a degree of negligence showing indifference to another and an utter disregard of the prudence that amounts to a complete neglect of the safety of such other person. Gross negligence is more than simple and ordinary negligence but less than willful or reckless conduct. Specifically, gross negligence is a degree of negligence showing an indifference to another's safety and/or well-being. Commonwealth v. Giddens, 295 Va. 607, 613 (2018).
69. Gross negligence includes the following elements: (1) duty; (2) breach of the duty; (3) causation; and (4) damages. *See Id.*
70. Plaintiff alleges sufficient factual support for all of these elements. Specifically, Plaintiffs asserts the following factual allegations against all Defendants:

- i. The Sheriff's Office owed a duty of care to Grusch;¹
- ii. The Defendants breached its duty of care by, among other things, violating standards of care as set forth in the Law Enforcement Guide to Virginia Freedom of Information Act and Virginia Code §§§ 2.2-3705.5(6)), 2.2-3705.1(1), 37.2-818(B); and
- iii. As a direct and proximate cause actions of the Defendants, Grusch has sustained and continues to sustain personal damage and professional damage.

WHEREFORE, on **COUNT IV**, the Plaintiff respectfully request that this Court grant the following relief jointly and severally:

- i. Damages from all Defendants in the amount up to \$2,084,999.98;
- ii. Punitive damages in the amount of \$350,000.00;
- iii. Court costs in bringing this action;
- iv. Attorney fees;
- v. Pre-and-post-judgment interest at the judgment rate; and/or
- vi. Such other relief as this Honorable Court deems just and proper.

COUNT V:
WILLFUL NEGLIGENCE
(All Defendants)
(Pleaded in the alternative)

71. This Count hereby incorporates the preceding and subsequent paragraphs of this Complaint by reference.

72. Plaintiff brings this claim in the alternative against all Defendants, jointly and severally, for willful negligence.

¹ A duty of care exists "whenever the circumstances are such that an ordinary prudent person could reasonably apprehend that, as a natural and probable consequence of his act, another person rightfully will be in danger of receiving an injury." RGR, 288 Va. 279 (2014) ¹

73. Plaintiff brings this Count against Defendant Jane Doe directly and via vicarious liability against Defendant Chapman.

74. Willful or wanton conduct is defined as an action undertaken in conscious disregard of the rights of another or with reckless indifference to the consequences of which the defendant was aware, from his/its knowledge of existing circumstances and conditions that his/its conduct probably would cause injury to another. Miller v. P.G. Christ, Inc., 297 Va. 604, 637 (2019).

75. Willful and wanton negligence includes the following elements: (1) duty; (2) breach of the duty; (3) causation; and (4) damages. *See Id.*

76. Plaintiff alleges sufficient factual support for all of these elements. Specifically, Plaintiff asserts the following factual allegations against all Defendants:

- i. The Sheriff's Office owed a duty of care to Grusch;²
- ii. The Defendants breached its duty of care by, among other things, violating standards of care as set forth in the Law Enforcement Guide to Virginia Freedom of Information Act and Virginia Code §§§ 2.2-3705.5(6), 2.2-3705.1(1), 37.2-818(B); and
- iii. As a direct and proximate cause actions of the Defendants, Grusch has sustained and continues to sustain personal damage and professional damage.

WHEREFORE, on **COUNT IV**, the Plaintiff respectfully request that this Court grant the following relief jointly and severally:

- i. Damages from all Defendants in the amount up to \$2,084,999.98;
- ii. Punitive damages in the amount of \$350,000.00;
- iii. Court costs in bringing this action;

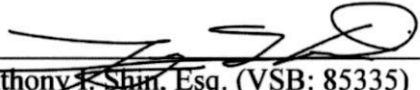
² A duty of care exists "whenever the circumstances are such that an ordinary prudent person could reasonably apprehend that, as a natural and probable consequence of his act, another person rightfully will be in danger of receiving an injury." RGR, 288 Va. 279 (2014) ²

- iv. Attorney fees;
- v. Pre-and-post-judgment interest at the judgment rate; and/or
- vi. Such other relief as this Honorable Court deems just and proper.

A TRIAL BY JURY IS DEMANDED.

Dated: July 16, 2024

Respectfully Submitted,
DAVID C. GRUSCH
By Counsel


[x] ~~Anthony F. Shin, Esq. (VSB: 85335)~~
[] Zachary D. Schuler, Esq. (VSB: 100006)
[] Basil M. Al-Qaneh, Esq. (VSB: 99933)
[] Bryan Stech, *Pro Hac Vice* (NYSB: 4904777)
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COVER SHEET FOR FILING CIVIL ACTIONS

COMMONWEALTH OF VIRGINIA

Case No. CL24-4023 (CLERK'S OFFICE USE ONLY)

Loudoun County

Circuit Court

David C. Grusch

v./In re:

Jane Doe

PLAINTIFF(S)

DEFENDANT(S)

Michael L. Chapman

I, the undersigned [] plaintiff [] defendant [] attorney for [] plaintiff [] defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

GENERAL CIVIL

Subsequent Actions

- [] Claim Impleading Third Party Defendant
[] Monetary Damages
[] No Monetary Damages
[] Counterclaim
[] Monetary Damages
[] No Monetary Damages
[] Cross Claim
[] Interpleader
[] Reinstatement (other than divorce or driving privileges)
[] Removal of Case to Federal Court

Business & Contract

- [] Attachment
[] Confessed Judgment
[] Contract Action
[] Contract Specific Performance
[] Detinue
[] Garnishment

Property

- [] Annexation
[] Condemnation
[] Ejectment
[] Encumber/Sell Real Estate
[] Enforce Vendor's Lien
[] Escheatment
[] Establish Boundaries
[] Landlord/Tenant
[] Unlawful Detainer
[] Mechanics Lien
[] Partition
[] Quiet Title
[] Termination of Mineral Rights

Tort

- [] Asbestos Litigation
[] Compromise Settlement
[X] Intentional Tort
[] Medical Malpractice
[] Motor Vehicle Tort
[] Product Liability
[] Wrongful Death
[] Other General Tort Liability

ADMINISTRATIVE LAW

- [] Appeal/Judicial Review of Decision of (select one)
[] ABC Board
[] Board of Zoning
[] Compensation Board
[] DMV License Suspension
[] Employee Grievance Decision
[] Employment Commission
[] Local Government
[] Marine Resources Commission
[] School Board
[] Voter Registration
[] Other Administrative Appeal

DOMESTIC/FAMILY

- [] Adoption
[] Adoption - Foreign
[] Adult Protection
[] Annulment
[] Annulment - Counterclaim/Responsive Pleading
[] Child Abuse and Neglect - Unfounded Complaint
[] Civil Contempt
[] Divorce (select one)
[] Complaint - Contested*
[] Complaint - Uncontested*
[] Counterclaim/Responsive Pleading
[] Reinstatement - Custody/Visitation/Support/Equitable Distribution
[] Separate Maintenance
[] Separate Maintenance Counterclaim

WRITS

- [] Certiorari
[] Habeas Corpus
[] Mandamus
[] Prohibition
[] Quo Warranto

PROBATE/WILLS AND TRUSTS

- [] Accounting
[] Aid and Guidance
[] Appointment (select one)
[] Guardian/Conservator
[] Standby Guardian/Conservator
[] Custodian/Successor Custodian (UTMA)
[] Trust (select one)
[] Impress/Declare/Create
[] Reformation
[] Will (select one)
[] Construe
[] Contested

MISCELLANEOUS

- [] Amend Birth/Death Certificate
[] Appointment (select one)
[] Church Trustee
[] Conservator of Peace
[] Marriage Celebrant
[] Approval of Transfer of Structured Settlement
[] Bond Forfeiture Appeal
[] Declaratory Judgment
[] Declare Death
[] Driving Privileges (select one)
[] Reinstatement pursuant to § 46.2-427
[] Restoration - Habitual Offender or 3rd Offense
[] Expungement
[] Firearms Rights - Restoration
[] Forfeiture of Property or Money
[] Freedom of Information
[] Injunction
[] Interdiction
[] Interrogatory
[] Judgment Lien-Bill to Enforce
[] Law Enforcement/Public Official Petition
[] Name Change
[] Referendum Elections
[] Sever Order
[] Taxes (select one)
[] Correct Erroneous State/Local
[] Delinquent
[] Vehicle Confiscation
[] Voting Rights - Restoration
[] Other (please specify)

TESTIMONY OF MICHAEL L. CHAPMAN, D.C.

[X] Damages in the amount of \$ 2,000,000.00 are claimed.

7/16/2024

DATE

[] PLAINTIFF

[X] DEFENDANT [X] ATTORNEY FOR

[] PLAINTIFF [] DEFENDANT

Shin, PLC

PRINT NAME

116-R Edwards Ferry Road, N.E. Suite R

ADDRESS/TELEPHONE NUMBER OF SIGNATOR

Leesburg, VA 20176

shin@shinlawoffice.com

EMAIL ADDRESS OF SIGNATOR (OPTIONAL)

*"Contested" divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.