

Attention Thomas Stuebner and Kathleen Haton:

The following is a formal request for information and records, pursuant to the Freedom of Information Act (FOIA). If you have any questions regarding the information contained herein, please contact this office as soon as possible so that any confusion may be cleared up or any information clarified in a timely manner.

1. Records Requested pertain to the intersection of 87<sup>th</sup> and Pulaski in Hometown, Illinois. Please supply:
  - A. All reports of any accidents occurring at 87<sup>th</sup> and Pulaski over the last 10 years.
  - B. Any and all reports, investigations or evaluations conducted by METRA of the railroad crossing at 87<sup>th</sup> and Pulaski for over the last 10 years.
  - C. Any and all reports, investigations or evaluations conducted by the Federal Railroad Administration, or any other entity of the railroad crossing at 87<sup>th</sup> and Pulaski – ever.
  - D. All video from trains or elsewhere of the intersection at 87<sup>th</sup> and Pulaski for the previous five years.
  - E. Any records of reports, complaints, comments, etc. concerning the railroad crossing at 87<sup>th</sup> and Pulaski from the last 10 years.
  
2. Records Requested pertain to an accident that occurred on 12/28/15 at approximately 1:00 pm at the rail crossing at 87<sup>th</sup> and Pulaski. Please supply:
  - A. The name of the conductor or driver of the Metra Train involved in the above stated accident.
  - B. The Conductor or Driver's cell phone information (phone number, service provider, etc.)
  - C. An electronic copy, burned to a CD or DVD, in a commonly recognized software format, regarding the above described accident, containing:
    - All investigative reports generated by METRA or other investigative units (police, engineering, etc.) in METRA's control, regarding the accident.
    - All video of the accident in METRA's control or possession, including but not limited to: the video from the train, the video from the tracks (if any), the video from the car wash next to the tracks.
    - All "black box" data in a commonly readable electronic format, or with executable software so that the data may be viewed, (data should include information such as speed of train, timing of braking initiation, location, etc.).
    - All pictures of the accident in your possession or control.
    - All audio recordings of the conductor/driver of the train, audio of radio communications or of the accident itself.
    - All reports of trouble, malfunction or other accidents at the crossing at 87<sup>th</sup> and Pulaski in the last ten (10) years.
  - D. The name of the last person (engineer?) in charge of servicing the tracks prior to 12/28/15.
  - E. The name of the last person to service the railroad crossing before 12/28/15.
  - F. All policies and procedures for operating METRA commuter trains in bad weather.

G. Any and all documents and memoranda alerting or otherwise discussing the weather conditions on 12/28/15.

H. Any and all documents and memoranda alerting or otherwise discussing safety measures to be taken on 12/28/15.

I. Any and all documents, reports, or tests containing evidence of drug or alcohol testing of the driver of the METRA train involved in the above named accident and, if in your possession, of the driver of the vehicle, Mark Bibbs

- Please supply all requested records and information in digital form via e-mail or CD-ROM
- Please direct any questions to Nick Albuquerk of Albuquerk & Associates via email at [Nick.albuquerk@gmail.com](mailto:Nick.albuquerk@gmail.com) , or via telephone at 773.847.2600
- Please send all responsive records to the following address:

Albuquerk & Associates  
Attn: Rachel Smith  
1450 West Randolph  
Chicago, Illinois 60607  
(Tel) 773.847.2600  
(Fax) 773.847.0330

Respectfully,

Nicolas Albuquerk