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April 11, 2024

VIA HAND DELIVERY

Mary A. Trimble, Clerk of Court
City of Charlottesville General District Court
606 East Market Street
P.O. Box 2677
Charlottesville, Virginia 22902

RE: Commonwealth v. Patrick Joseph McNamara
GC24000125-00

Dear Ms. Trimble:

Please find enclosed for filing in the above-referenced matter Defendant's Motion to Dismiss with Prejudice.

Should you have any questions or concerns, please do not hesitate to contact me. Thank you.

Sincerely,

Rhonda Quagliana

RQ/dkm
Enclosure

Cc: William Tanner, Esquire (*via email and facsimile*)
Patrick Joseph McNamara

VIRGINIA: IN THE GENERAL DISTRICT COURT FOR THE CITY OF
CHARLOTTESVILLE

COMMONWEALTH OF VIRGINIA,

v.

Case No.: GC24000125-00

PATRICK JOSEPH MCNAMARA,

Defendant.

MOTION TO DISMISS WITH PREJUDICE

The defendant, Patrick Joseph McNamara (“Mr. McNamara”), by counsel, for his Motion to Dismiss with Prejudice, states the following:

1. Mr. McNamara is charged with assault and battery on or about January 12, 2024, against J.L. in violation of Virginia Code § 18.2-57.
2. After months of stonewalling and resistance, the police and prosecuting attorneys have finally turned over video evidence conclusively proving Mr. McNamara did not commit this crime.
3. Mr. McNamara should not remain under any bond conditions, have his freedom curtailed, or suffer under the burden of a false accusation.
4. The Court should immediately dismiss the charge, with prejudice.

BACKGROUND: HOW MR. MCNAMARA WAS FALSELY ACCUSED AND IMPROPERLY IDENTIFIED

5. On January 12, 2024, Charlottesville police received a report of an assault from victim “J.L.”
6. J.L. was running on the Rivanna Trail heading southbound. According to J.L., she went under Free Bridge and passed the Rivanna River Company when someone

walking north, wearing a hoodie, sweatpants, and a puffy white jacket, tried to grab her. She resisted and the assailant grabbed her buttocks.

7. Of note, the victim repeated that the assailant was wearing a distinctive item of clothing: a “white puffy jacket.”

8. J.L. also said the attacker was someone she recognized on the trail. She and this person had crossed paths in the past, maybe as many as 10 times.

9. Later that afternoon, police received a second report of an assault on a different female victim along the Rivanna Trail close to Riverview Park. The victim reported that someone had followed her from the trail to the park, approached, and grabbed her buttocks.

10. The police canvassed the area and were given the name of a possible suspect. They did nothing to follow up on that lead.

11. Although the area along the trail is lined by multiple businesses with surveillance video equipment aimed in just about every direction, the police reported at the time they were investigating that no video was available to help identify the suspect.

12. On January 16, 2024, the police were provided a photograph taken by someone living on Locust Avenue who was a member of J.L.’s local running group. The photograph was allegedly of the reported assaulter. It happened to be a photograph of Mr. McNamara on one of his routine morning walks.

13. Instead of taking steps to ensure that the photograph was not unduly suggestive, the police never conducted a line up or photo identification that complied with best practices. When the photograph of Mr. McNamara circulated among the

neighborhood community and police officers, law enforcement officials assumed he was the attacker. That confirmation bias polluted the case.

14. As days passed, J.L. expressed frustration to members of the group regarding the lack of communication from the police. The running group became determined to solve the crime on their own.

15. J.L. sent the photograph of Mr. McNamara to a friend, another running group member, who thought she recognized the person from Iron Will Gym. Mr. McNamara had been going to the gym for months because the gym is next to his apartment.

16. Rather than follow accepted police practices, J.L. identified Mr. McNamara at her friend's urging after being told that people thought Mr. McNamara was the attacker.

17. J.L. endorsed the idea and said the man who grabbed her on the trail was Mr. McNamara. The running group celebrated their amateur detective work, cheering themselves for making sure no other woman became a victim of the assailant. They all wanted Mr. McNamara arrested immediately.

18. Of course, J.L.'s identification of Mr. McNamara eventually proved entirely wrong. She had identified the wrong person.

19. Using this completely untested, unreliable identification of Mr. McNamara, the police sought his contact information from the local gym owner. The police then obtained an arrest warrant and a search warrant for Mr. McNamara's apartment.

20. At this point, the police had apparently conducted no other investigation to determine whether J.L. had identified the right person.

21. On January 18, 2024, Mr. McNamara endured every citizen's worst nightmare – he was arrested for a crime he did not commit. He was handcuffed. His phone was seized, and he was transported to the jail where he was fingerprinted, and his mugshot taken.

22. He was taken before a magistrate and, fortunately, released on bond. He faced up to a year in jail and a fine. Mr. McNamara's bond restricted his whereabouts and prohibited him from traveling outside the state. If wrongfully convicted, Mr. McNamara could never have the charge expunged. It would permanently remain on his record.

23. On that same date, the police searched Mr. McNamara's apartment. Six officers searched his apartment, while Mr. McNamara's fiancé was present in the home.

24. They rifled through his private spaces, searching for the distinctive item of clothing worn by the assailant – a white puffy jacket.

25. They recovered only a pair of black sweatpants.

26. At the time he was falsely accused and arrested, Mr. McNamara had a good job. He had never had any contacts with the police whatsoever. His reputation was pristine. He had been a law-abiding citizen his entire life. He had moved to Charlottesville for better weather and because he liked the atmosphere of the city.

27. Mr. McNamara is an ardent walker. He walks every day, sometimes more than once. He walks around downtown Charlottesville and has walked the Rivanna Trail.

28. Following his arrest, the police plastered Mr. McNamara's photograph on the internet in a vain attempt to pin other criminal claims against him. A copy of the publicly available and disseminated News Flash is attached as Exhibit 1.

29. Following his arrest, Mr. McNamara very publicly and consistently denied the crime. He insisted that he had done nothing wrong and was wrongly accused. No one listened.

30. Instead, Police Chief Michael Kochis ("Chief" or "Chief Kochis") provided an interview on January 26, 2024, in which he vouched for the integrity of the "investigation" leading to Mr. McNamara's arrest. The Chief described the evidence he claimed his department had "compiled." He claimed that the investigation was ongoing, suggesting that Mr. McNamara likely committed other criminal acts. He mentioned a crime that had been committed in October 2023, insinuating that Mr. McNamara was probably the perpetrator.

31. Chief Kochis vouched for the way in which Mr. McNamara had been identified and claimed the Charlottesville Police Department ("CPD") uses "best practices." In fact, no one had conducted any semblance of a line up or employed other accepted means to ensure a proper identification.

32. The Chief gave lip service to the idea that Mr. McNamara was innocent until proven guilty but said that the police would not have made an arrest without evidence to back it up. The suggestion was that the police had gathered evidence proving Mr. McNamara committed the crime charged. In fact, that was far from the truth.

33. The Chief also claimed that all the evidence gathered in the investigation would be turned over to undersigned counsel.

34. It now appears that the police had possession of exculpatory information that would have exonerated Mr. McNamara long ago. Under the law, any evidence exculpatory to the defendant *must* be produced. The United States Constitution requires the police and the prosecution to provide even *potentially* exculpatory evidence at the earliest possible opportunity.

35. Conclusively exculpatory evidence has now been provided to the defense, just days before the Commonwealth was still insisting on trying Mr. McNamara for a crime he did not commit.

**MR. MCNAMARA'S REPEATED PLEAS
FOR EVIDENCE AND TO ABANDON THE UNFOUNDED PROSECUTION**

36. Mr. McNamara retained undersigned counsel on January 24, 2024, who in turn requested discovery from the Commonwealth on that same date.

37. On January 31, 2024, some discovery began trickling in, including body-worn camera videos of J.L.'s statement, some police reports, and photographs from the execution of the search warrant.

38. On February 1, 2024, undersigned counsel contacted defendant's employer and requested digital evidence from Mr. McNamara's work devices, and this data was provided. This included the times and IP addresses which Mr. McNamara accessed and utilized.

39. This evidence was critical because it conclusively proved that Mr. McNamara was at home at the time of the second attack on the afternoon of January 12.

40. Mr. McNamara's alibi fell on deaf ears. Law enforcement did not want to hear about or even review that evidence. The reason given? Mr. McNamara was not charged with the second attack.

41. On February 7, 2024, undersigned counsel requested key fob data from Mr. McNamara's apartment complex, and the data was received the next day.

42. That data established when Mr. McNamara entered his apartment after his morning walk and also provided additional corroboration that he did not attack the second victim. He was at home working at the time of the second attack, as the evidence conclusively established.

43. On March 1, 2024, undersigned counsel requested Google data in the possession of the Commonwealth. The data was provided and contained GPS coordinates and times, establishing his locations before and after the attack.

44. The data identified Mr. McNamara's whereabouts at the time of the alleged attack on J.L.

45. On March 7, 2024, counsel for the defendant sent a letter to the Commonwealth outlining the evidence showing that Mr. McNamara was not on the trail during the timeframe J.L. says she was attacked, and that Mr. McNamara was at home on his computer during the second attack.

46. Despite the electronic data recovered from his phone and the key fob data collected from the apartment, the prosecution remained unwavering. No one wanted to believe that the wrong person had been identified, Mr. McNamara wrongly accused, and the real assailant still at large.

47. If there was any doubt about the accuracy of the Google data, Mr. McNamara voluntarily provided the prosecution and police the passcode to his phone so that an extraction of his phone data could be obtained. He was not required to allow the

police to search his phone and hoped they could recover more data establishing his whereabouts on the date of these crimes.

48. The data was provided to the defense on April 1, 2024, and again confirmed Mr. McNamara was not near the location of J.L.'s attack.

49. Additionally, in response to repeated requests for more precise details about the time and location of the first attack, on March 18, 2024, the Commonwealth finally provided text messages and Strava data from J.L.¹ That data further exonerated Mr. McNamara.

50. J.L. was able to pinpoint the exact location and time of her attack. The data established that J.L. started her run at 9:02 a.m. and placed her attack occurring 38 minutes and 30 seconds later – at 9:40:30 a.m.

51. The GPS and phone data collected by law enforcement both confirm that at 9:40 a.m., Mr. McNamara was near his apartment north of Free Bridge, and not on the Rivanna Trail. A demonstrative exhibit showing the location of the attack, and the GPS data showing Mr. McNamara's location at that time is attached as Exhibit 2.

52. The key fob data collected established that Mr. McNamara entered his apartment complex at 9:41 a.m. and the work data showed him accessing his work computer at 9:53 a.m.

53. Again, the prosecution was unmoved by this evidence and stated their intention to proceed to trial.

¹ Strava is internet service for tracking physical exercise that incorporates social network features. It is popular among runners, cyclists, hikers, walkers and other active individuals.

54. On April 2, 2024, the defense also insisted that the Commonwealth provide information about the second attack. Though met with resistance, that request was eventually honored.

55. The police reports were exonerating. Still, the prosecution was undeterred.

MR. MCNAMARA CONDUCTS HIS OWN INVESTIGATION

56. In his interview regarding the case, Chief Kochis pointed out that the police and the prosecution bear the burden of investigating the crime, collecting sufficient evidence for a conviction, and proving someone's guilt beyond a reasonable doubt.

57. In Mr. McNamara's case, those basic principles were flatly and flagrantly ignored.

58. The defense secured the services of a private investigator, James Melia ("Mr. Melia"), a former agent with the Federal Bureau of Investigation who has investigated high-profile cases like the murders of Hannah Graham and Alexa Murphy.

59. Mr. Melia examined the scene and immediately noted the abundance of surveillance video cameras. Unlike the police, Mr. Melia contacted every business in the area to determine whether video from the date in question still existed.

60. Astonishingly, no video surveillance had been produced to counsel in discovery. By all appearances, there was no video depicting the area that could prove Mr. McNamara's guilt – or totally exonerate him.

61. On April 8, 2024, defense counsel sent a letter to Chief Kochis, demanding that the CPD attempt to locate any video that would corroborate Mr. McNamara's unwavering denials of guilt. A copy of this letter is attached as Exhibit 3.

62. In the meantime, many upstanding citizens had cooperated with Mr. Melia and given interviews. These citizens were strangers to Mr. McNamara and had nothing to gain by their involvement. They consistently described Mr. McNamara's typical clothing when they observed him on his routine walks around Charlottesville.

63. These perfect strangers were willing to tell the truth – they had never seen Mr. McNamara in a white puffy jacket – ever. And all of them said they would have noticed if Mr. McNamara had ever worn such an item of clothing. The police had never interviewed anyone in the area with this information.

64. When their names became known to the prosecution by reviewing defense subpoenas, undersigned counsel was accused of summoning “half of Charlottesville” to court for trial. Instead, the police should have interviewed these witnesses as part of any routine investigation.

65. On April 8, 2024, defense counsel learned that a witness who was critical to the case would be unavailable for trial – namely the individual on Locust Avenue who was instrumental in the misidentification of Mr. McNamara as the attacker.

66. The witness had a legitimate excuse and could not appear. The Commonwealth nevertheless objected to a continuance and declared a trial would occur as scheduled.

67. During an appearance on April 9, 2024, to address the defense's motion to continue, an assistant Commonwealth's Attorney produced a jump drive and indicated that the contents would end the prosecution of Mr. McNamara.

68. The relevant portions of the video produced are attached as Exhibits 4-6. The video comes from surveillance cameras pointed directly at the Rivanna Trail from Cosner Brothers Body Shop (“Cosner”), with multiple views provided.

69. A witness at the business had informed Mr. Melia that Cosner maintains video for no more than 30 days. The data indicates the police had this video in their possession beginning on January 22, 2024.

70. The video proves conclusively that Mr. McNamara did not commit the crime charged. Mr. McNamara is not dressed in the distinctive white puffy jacket the victim described.

71. The video shows Mr. McNamara passing toward Free Bridge before the assault occurred, crossing paths with the victim just as she comes south on the trail under the bridge.

72. A different video angle shows the victim stopping to throw something in the trash and then passing Mr. McNamara without incident.

73. To be clear, the videos do not simply create reasonable doubt. They demonstrate without question what Mr. McNamara maintained all along – he was innocent. He was not the person who assaulted a woman, or women, on the Rivanna Trail.

74. More astonishing still, at 9:54:50, the same surveillance video shows the actual assailant dressed exactly as the victim had described – in a white puffy jacket. A copy of this portion of the video is attached as Exhibit 7.

75. Continued viewing of the surveillance videos shows the man in the white puffy jacket stopping to talk with two individuals (Exhibit 8) and at 10:03:12 a.m.,

walking south on the Rivanna Trail (Exhibit 9). At this exact time Mr. McNamara was at home on an active video call with co-workers.

76. At 3:59 p.m., surveillance video shows four officers walking together down the trail (Exhibit 10).

CONCLUSION AND RELIEF SOUGHT

77. Law enforcement upended Mr. McNamara's life when he was wrongly accused and prosecuted for a crime he did not commit. The police's investigation was an abject disaster: riddled with gross deviations from standard police best practices, law enforcement did nothing to ensure the right person was charged.

78. When the available evidence exonerated Mr. McNamara, no one would listen or act. At the last minute, and only at our insistence, the defense received surveillance video conclusively proving that Mr. McNamara is innocent.

79. Worse still, the attacker remains at large and a potential threat to the community.

80. Mr. McNamara's arrest and prosecution have tarnished his good reputation and name. He was suspended from work. Efforts are underway to evict him from his apartment. He has suffered tremendous stress and embarrassment from having been wrongly accused of sexually assaulting a stranger or strangers, and the cost – both emotionally and financially – of having to prove his innocence.

81. Mr. McNamara has suffered under the threat of a criminal conviction and imprisonment since his arrest.

82. All of this could have been avoided. Mr. McNamara should not remain under suspicion or under threat of criminal prosecution for one more moment.

83. The Court should dismiss the charge immediately with prejudice.

84. Counsel and her client will make themselves available at the Court's convenience.

WHEREFORE the defendant, Patrick Joseph McNamara, moves the Court to grant his Motion to Dismiss with Prejudice, and for such other relief the Court deems proper and appropriate.

PATRICK JOSEPH MCNAMARA

By Counsel

MICHIEHAMLETT PLLC

By: 

Rhonda Quagliana, Esquire
VSB #39522
MichieHamlett PLLC
310 4th Street NE, 2nd Floor
P.O. Box 298
Charlottesville, Virginia 22902
(434) 951-7225
(434) 951-7279 *facsimile*
rquagliana@michiehamlett.com
Counsel for Defendant

CERTIFICATE

I hereby certify that a true and exact copy of the foregoing was sent by email and facsimile this 11th day of April, 2024, to:

William Tanner, Esquire
City of Charlottesville
Commonwealth Attorney's Office
P.O. Box 911
Charlottesville, Virginia 22902
(434) 970-3176
(434) 971-8202 *facsimile*
tannerw@charlottesville.gov


Rhonda Quagliana

Charlottesville Police News

Posted on: January 12, 2024

CPD Makes Arrest in Rivanna Trail Case

FOR IMMEDIATE RELEASE
January 19, 2024



CPD Makes Arrest in Rivanna Trail Case

CHARLOTTESVILLE, VA - On January 18, 2024, at approximately 2:30 p.m., Charlottesville resident, Patrick McNamara, was charged with Assault and Battery for an incident that occurred on January 12, 2024, on the Rivanna Trail in the City of Charlottesville.



McNamara was taken into custody without incident. This investigation remains ongoing as our officers look into other reports and evidence pertaining to this case.

If you have any information regarding this case, please call Crime Stoppers Tip Line at (434) 977-4000.



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CPD Seeks Information in Reported Assault (Original Release, January 12, 2024)

CHARLOTTESVILLE, VA - On January 12, 2024 at approximately 10:00 a.m., CPD responded to a report of a female who had been assaulted on the Rivanna Trail between Riverview Park and Free Bridge.

Officers quickly arrived and began searching for a suspect, but were unable to locate one. A second call came in at approximately 2:40 p.m. reporting a second victim who had been assaulted near the same location one hour prior to the initial call. Neither victim sustained any physical injury. The suspect in both incidents is described as a thin white male, 20 or 30 years of age, approximately 6'2" in height. He was described as wearing a brown puffy jacket in one incident and black pants and a sweatshirt in the second. Witnesses say he may have been wearing over-the-ear headphones as well.

Our officers have been providing additional patrols on the trails throughout the day, which will continue through the weekend. If you have information regarding either case, please call Crime Stoppers Tip Line at (434) 977-4000.

Media Contact
Kyle Ervin
Public Information Officer
City of Charlottesville
(434) 326-3043
ervinkl@charlottesville.gov

Next =>

[Charlottesville Police Department Addresses Recent Burglaries](#)

Other News in Charlottesville Police News

[Charlottesville Police Department Addresses Recent Burglaries](#)

Posted on: January 12, 2024



[CPD and City Schools Work Together to Address Alleged Incident](#)

Posted on: January 10, 2024



[CPD Locates Armed Subject in Belmont Neighborhood](#)

Posted on: January 5, 2024



[CPD Seeks Assistance Locating Suspect](#)

Posted on: January 3, 2024



[CPD Makes Arrest in Charlottesville High School Case](#)

Posted on: December 8, 2023

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CPD Seeks Assistance Locating Suspect

Posted on: December 1, 2023



CPD Graduates Most Diverse Class in Department History

Posted on: November 16, 2023



CPD Arrests Albemarle County Man for Possession of Firearms

Posted on: November 15, 2023



Charlottesville Police Officer Seriously Injured During Arrest of a Juvenile Suspect

Posted on: November 3, 2023



CPD Releases 2022 Annual Report

Posted on: June 9, 2023

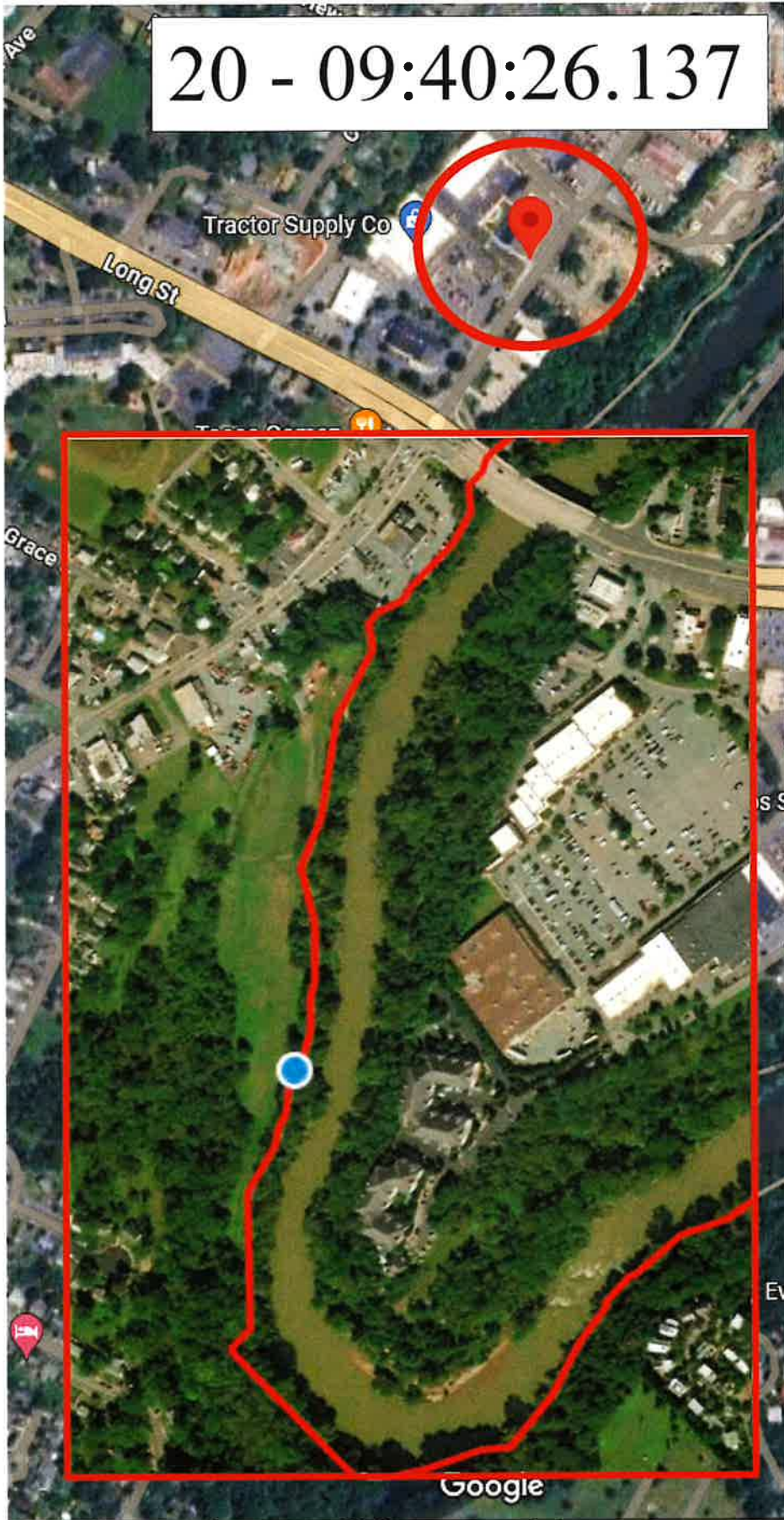


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EXHIBIT

2

tabbler



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April 8, 2024

VIA EMAIL (chief@charlottesville.gov)

Michael Kochis, Chief of Police
Charlottesville Police Department
606 E. Market Street
Charlottesville, VA 22902

RE: Commonwealth v. Patrick Joseph McNamara
GC24000125-00

Dear Chief Kochis:

I represent Patrick McNamara. He is charged with assault and battery on January 12, 2024, in connection with incidents that occurred on the Rivanna Trail, when someone grabbed two unsuspecting women, one in the morning and one in the afternoon. Mr. McNamara's trial is scheduled for April 15, 2024 at 9:05 a.m.

I recently engaged the assistance of a private investigator, James Melia, who is retired from the FBI and investigated such high-profile cases as the Hannah Graham and Alexis Murphy homicides. He has examined the area of the assaults.

For some time, your department has had possession of Google maps data that pinpoints Mr. McNamara's whereabouts when he took his normal early morning walk on January 12. My investigator has viewed the areas depicted by the Google data.

As you surely also know, the first victim of the assaults that day described Mr. McNamara wearing a hoodie, sweatpants, and a white puffy jacket. We are doing our best to locate any available video that would show Mr. McNamara's state of dress on the date he is accused of the attack. Frankly, your department should have conducted this footwork to ensure that the right person was charged and should have sought out available video images to determine whether Mr. McNamara was dressed in a puffy white jacket as the victim described.



At my client's direction, I am writing to ask that you deploy your officers to seek out and secure any existing video from that date, and specifically during the time frame between 8:20 a.m. and 10:00 a.m. I have attached photographs of the video cameras that likely would have captured an image of Mr. McNamara on the date in question. These were observed by Mr. Melia.

I am asking you to correct the lack of investigation because Mr. McNamara is certain that any videotape capturing his image that morning would verify that he was not wearing this distinctive item of clothing – a white puffy jacket. The most obvious sources of any videotape are as follows:

1. Charlottesville Wrecker;
2. Hogwaller Brewery;
3. CVS;
4. Tractor Supply Company;
5. A2Z Auto;
6. Cosner Auto Body;
7. Blue Ridge Motor Works;
8. VFW;
9. WA Lynch Roofing;
10. Kayak;
11. CareTeam;
12. Quarles Fleet Fueling;
13. Lumacyte;
14. Central Virginia Rental;
15. Go Store It;
16. MS Events;
17. Atlantic Emergency Services;
18. Sergeant Huber – Charlottesville Police Department Internal Affairs for Downtown Mall camera coverage; and,
19. Charlottesville Transit Authority.

I am also enclosing a subpoena for your appearance. Please let me know if you wish to be served in the normal course, or if you will accept service of a subpoena by agreement. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

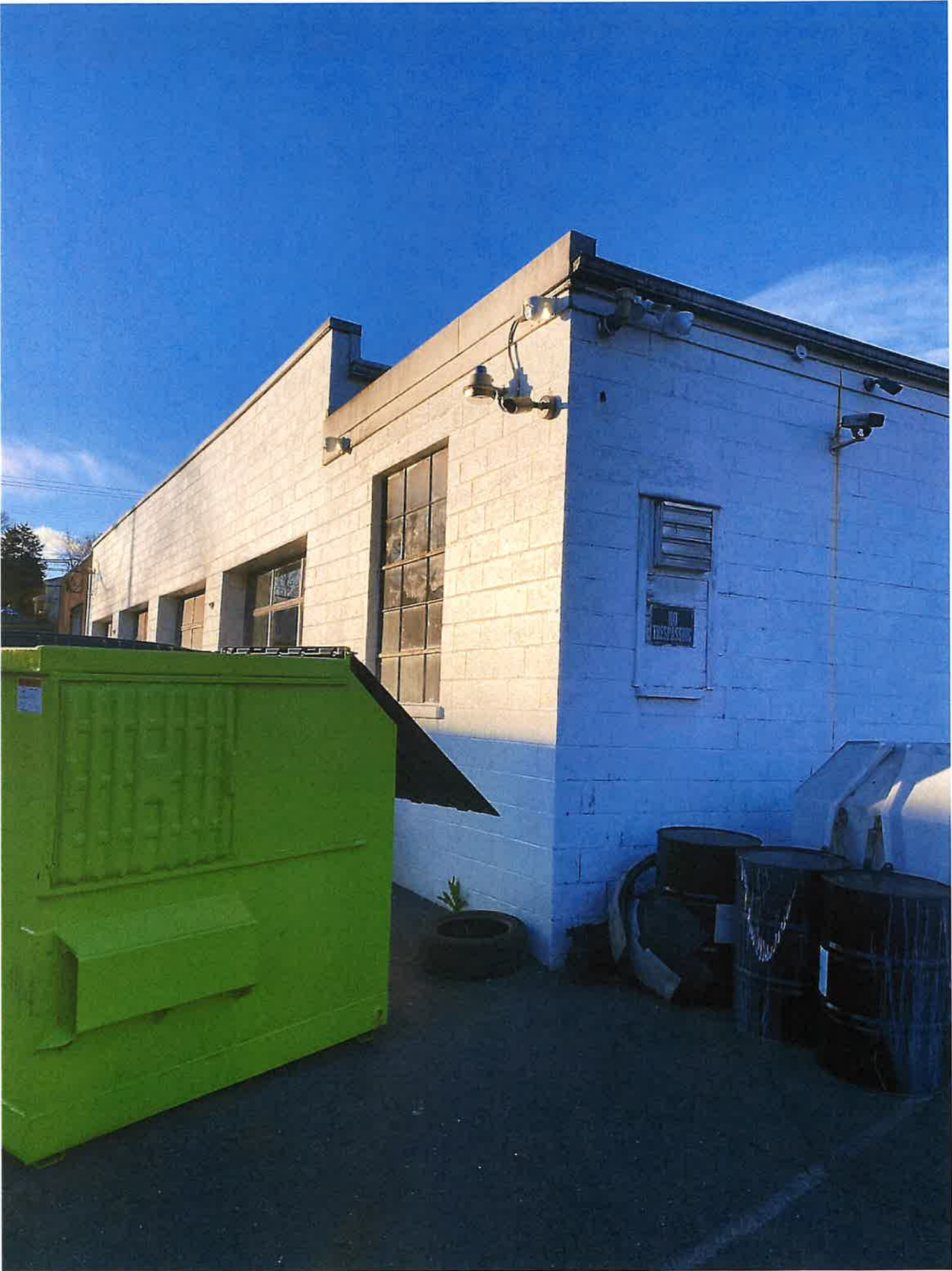


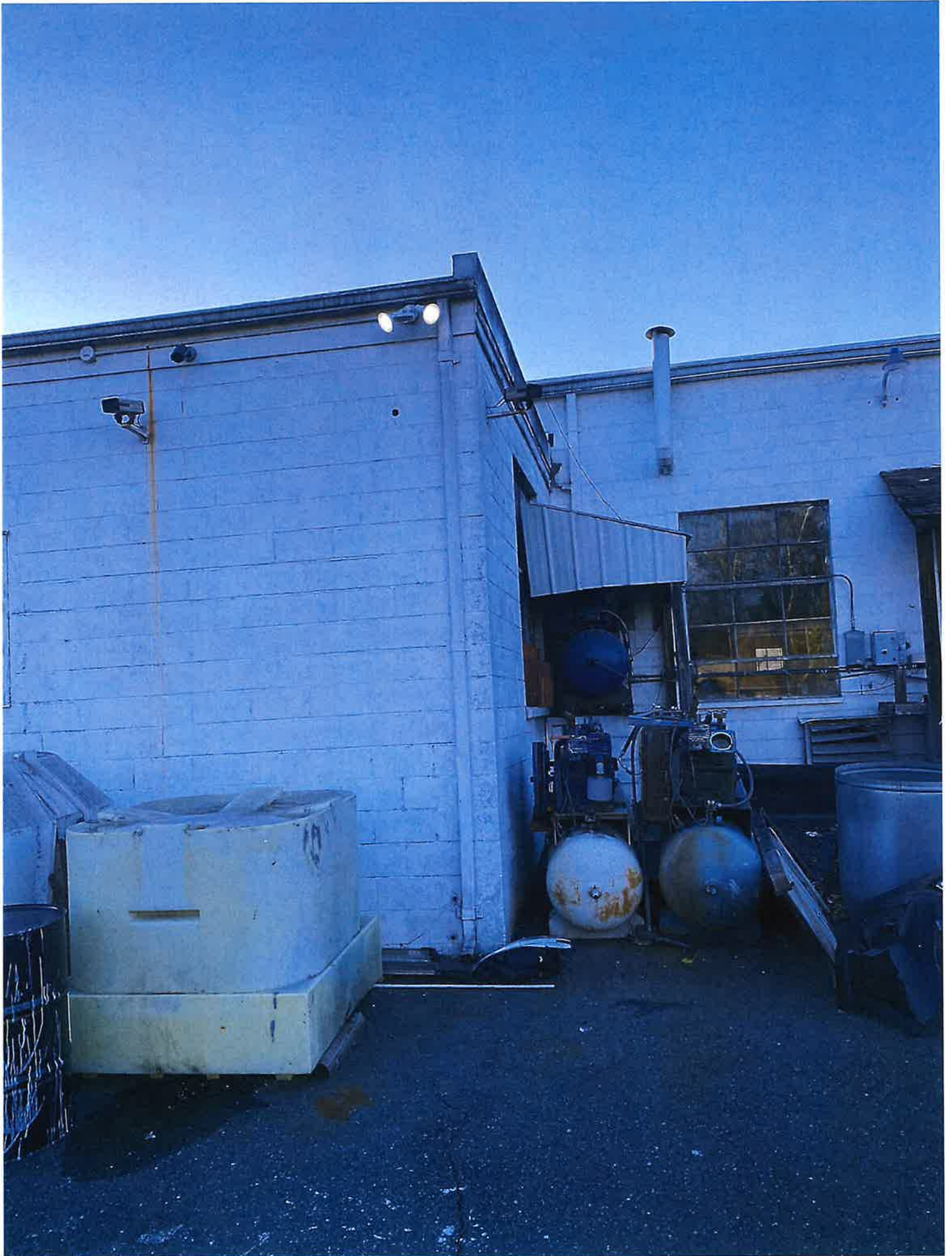
Rhonda Quagliana

RQ/dkm

Enclosures

Cc: William Tanner, Esquire (*via email*)
Det. Christopher Raines (*via email*)
Patrick Joseph McNamara

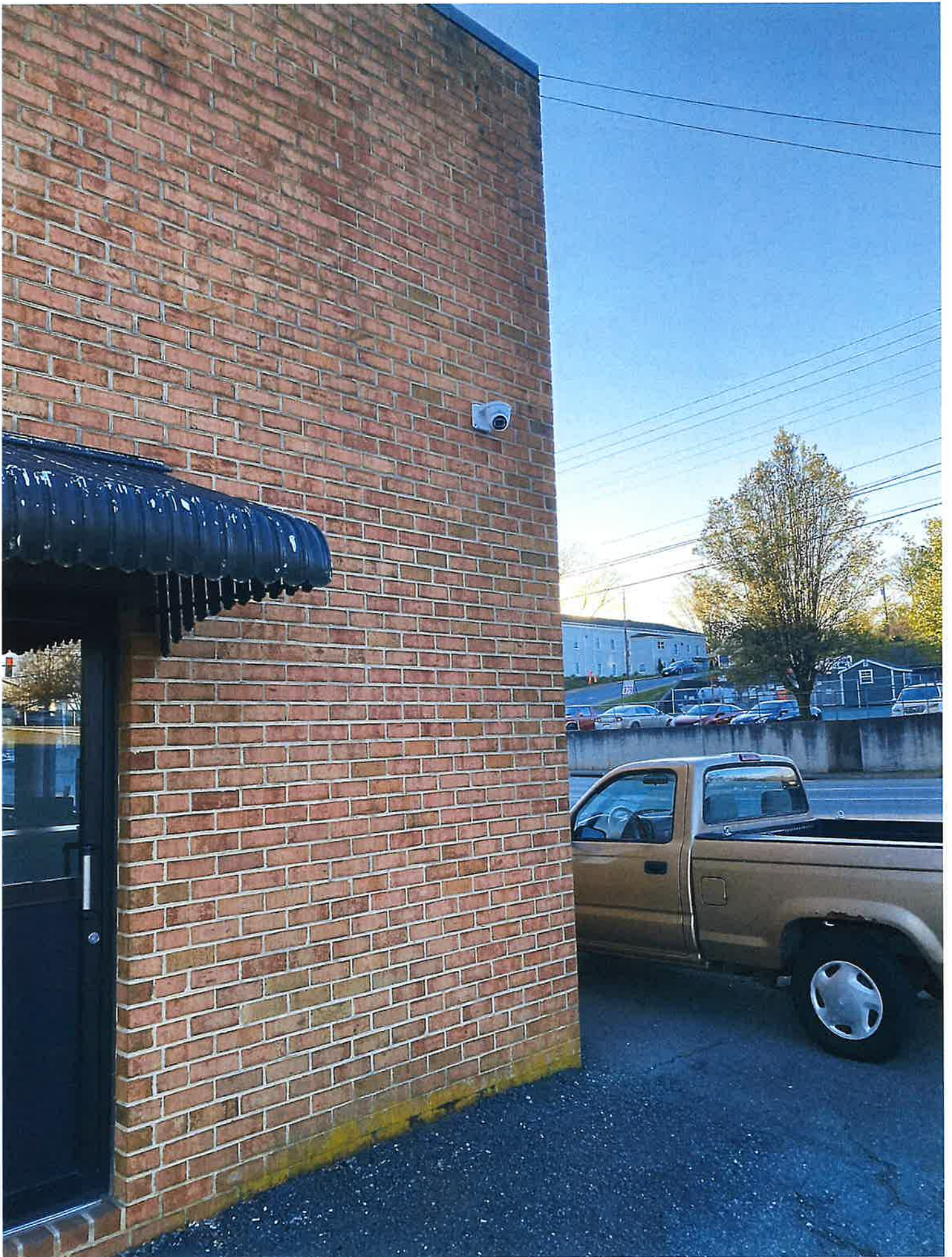


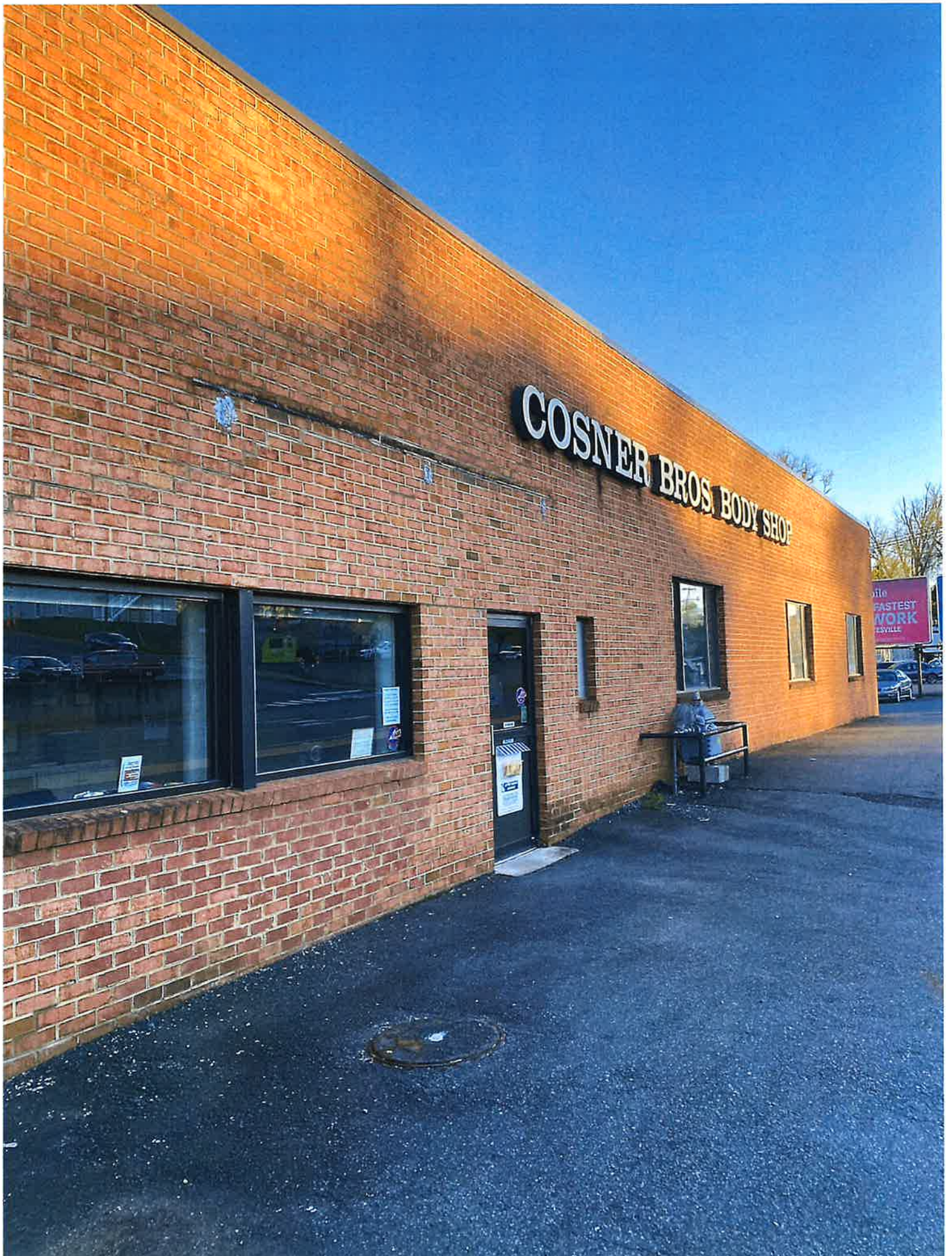












SUBPOENA FOR WITNESSES

Commonwealth of Virginia

VA CODE §§ 8.01-407, 16.1-265, 17.1-617, 19.2-267, and Rules 3A.12 and 7A.12

General District Court (Civil Criminal [Traffic]
 Juvenile and Domestic Relations District Court

Charlottesville
 CITY OR COUNTY

606 East Market Street, Charlottesville, VA 22902

STREET ADDRESS OF COURT

434-970-3388

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

April 15, 2024 at 9:05 am to testify in this case.

DATE TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME: Chief Michael Kochis ADDRESS: CPD, 606 E. Market Street Rd. Charlottesville, VA 22902	Tel No. _____ PERSONAL SERVICE: <input type="checkbox"/>
<input type="checkbox"/> Being unable to make personal service, a copy was delivered in the following manner: <input type="checkbox"/> Delivered to a person found in charge of usual place of business or employment during business hours and giving information of its purpose. <input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purpose. List name, age of recipient, and relation of recipient to party named above.	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.) <input type="checkbox"/> Served on Secretary of the Commonwealth.	
DATE _____ for _____ SERVING OFFICER _____	DATE _____ for _____ SERVING OFFICER _____

NAME: _____ ADDRESS: _____	Tel No. _____ PERSONAL SERVICE: <input type="checkbox"/>
<input type="checkbox"/> Being unable to make personal service, a copy was delivered in the following manner: <input type="checkbox"/> Delivered to a person found in charge of usual place of business or employment during business hours and giving information of its purpose. <input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purpose. List name, age of recipient, and relation of recipient to party named above.	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.) <input type="checkbox"/> Served on Secretary of the Commonwealth.	
DATE _____ for _____ SERVING OFFICER _____	DATE _____ for _____ SERVING OFFICER _____

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

CASE NO.
 GC24000125-00

Commonwealth of Virginia [or]
 CITY [] COUNTY [] TOWN of

[or]

[]

In re/v.

Patrick McNamara

Charge:

Assault and battery; 18.2-57

SUBPOENA FOR WITNESSES

The witnesses are subpoenaed to testify on behalf of:

- Commonwealth of Virginia [or]
- the City, County or Town indicated [or]
- Plaintiffs [or]
- Defendants [or]
- Juvenile

Subpoena requested by:

Rhonda Quagliana, attorney for defendant

04/08/2024

DATE ISSUED



CLERK MAGISTRATE JUDGE
 PROSECUTING DEFENSE ATTORNEY