



March 23, 2023

VIA FAX, VIA EMAIL  
VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Colonel Jack Chambers  
Interim Superintendent  
West Virginia State Police  
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South Charleston, WV 25309  
Fax: 304-558-0140

The Hon. Patrick Morrissey, Esq.  
West Virginia Attorney General  
State Capitol Complex  
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**RE: Notice of Forthcoming Legal Action**

Colonel Chambers:

Please be advised that this office represents two (2) retired West Virginia State Police uniformed employees and a civilian female. The identities of these individuals are not being revealed yet to prevent further harm. As officers of the court, Toriseva Law will safeguard these identities until otherwise directed.

Our clients regularly used the female locker room at the West Virginia State Police Academy during their career and after their retirement as West Virginia State Police employees. The civilian female, as a dependent of a uniformed state police officer, also utilized these private areas of the academy facilities. According to the now publicized anonymous letter sent to Governor Justice, the office of the Attorney General, and numerous other state lawmakers on or about February 16, 2023, a hidden camera was placed and operated inside the female locker room at the State Police Academy.

Our three (3) victims know they accessed and used the female locker room at the West Virginia State Police Academy during the relevant time the anonymous letter indicates. The anonymous letter further indicates this hidden camera was placed in the female locker room by a separate West Virginia State Police employee. This fact has been reported by multiple media outlets and other

witnesses and individuals with knowledge of these events. When evidence of the unwarranted, unauthorized, and illegal surveillance was discovered, another uniformed West Virginia State Police employee allegedly destroyed that evidence.

Please accept this letter as notice under **West Virginia Code § 55-17-3** that an action related to the rights of females utilizing the West Virginia State Police Academy to not be photographed or video recorded as they use locker room and training facilities will be instituted against the West Virginia State Police seeking all damages available under the law. We also anticipate filing claims for spoliation of evidence. The alleged claims and relief sought will be instituted upon the expiration of thirty (30) days as required by statute.

As an alternative to filing suit, we would request a meeting to discuss these allegations and a possible resolution to the same.

If you are agreeable to meet prior to the expiration of the thirty (30) days, please contact me.

Sincerely,



Teresa C. Toriseva Esq.

TCT/mak  
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