



101 Upper Cross Street
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Singapore 058357
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(UEN No. 201540776K)

97545861

Director

Mr. K Jayakumar Naidu, LL.B. (Hons)
Barrister-At-Law (Inner Temple)

Associates

Ms. Mumtaj Banu, LL.B. (Hons)

Mr. Rajwin Singh Sandhu, LL.B. (Hons)
BA (Psychology)

jayassociates.criminal@gmail.com

*(Not for service of Court Documents)

Your Ref :
Our Ref : JLC/0219/2016.LLL

2 May 2017

LKK
51 Ubi Avenue 1, #01-25
Paya Ubi Industrial Park
Singapore 408933

SJD 5210M R 3800/-
DOA 07/06/16
BY HAND ONLY

Dear Sirs,

RECONSTRUCTION OF TRAFFIC ACCIDENT SCENE

We refer to the above matter.

We act for Mr. Liu Li-Liu in his legal matters before the State Court of Singapore.

Mr. Liu is the Accused in the present case and we are seeking your assistance with an expert report involving a fatal accident between his vehicle and a pedestrian on 7th June 2016.

We have enclosed the following documents:

1. Sketch Plan
2. 19 Photographs obtained from the Traffic Police
3. The surveyor's damage report of the vehicle
4. Other photographs taken at the accident location

The concerned issues here are as follows:

- a) Whether the vehicle went over the kerb in causing the accident
- b) The location of the bollard at the kerb. Can this be moved or unattached during the accident?
- c) The location where the body landed. The charge states that the accident was at the Zebra/Pedestrian crossing. Can the body be shifted to the landing point by the vehicle?
- d) Did the accident happen at the crossing/pedestrian crossing or any other spot?

We would greatly appreciate an early reply and your expert report so that we can make the necessary representations to AGC.



Our Ref: JLC/0219/2016.LLL

We also undertake to remit the necessary charges.

Thank you.

Yours faithfully



JAY Law Corporation



**SINGAPORE
POLICE FORCE**

TRAFFIC POLICE
10 UBI AVE 3
SINGAPORE 408865
Tel : 65476244/43
Fax : 65474749

Your Ref: Pls Advise

Our Ref: TP 00095725F TP/IP/29079/2016)

Date : 12/4/2017

**JAY ASSOCIATES
101 UPPER CROSS STREET
04-17 A PEOPLE'S PARK CENTRE
SINGAPORE 058357**

Dear Sir / Madam

ACCIDENT INVOLVING VEHICLES NO. SJD 5210 M / PEDESTRIAN ON 7/6/2016

I refer to your / my letter dated _____ I wish to draw to your attention to the item(s) marked "X" hereunder:-

- ☐ The case is untraced. Please supply your client's report for further checking.
- ☐ Please be informed that Traffic Police will not investigating into the accident as it is a non-injury case which did not fall within the various categories of exception. You may wish to know that this is pursuant to the Non-Injury Accident Reporting Scheme which was implemented on 1 May 1999, (GIA)
- ☐ This case is still under investigation. The investigation officer is _____. Tel: 6547.
- ☐ No action is being taken against anyone in this case. This does not preclude further prosecution should new evidence emerge later. Our findings do not effect insurance and civil claims.
- ☐ Action is being taken against the driver of vehicle no: _____ for Inconsiderate driving.
- ☐ The driver of vehicle no : _____ has accepted the offer of composition on _____ for Inconsiderate Driving .
- ☐ The driver of vehicle no : _____ has been given a warning for Careless Driving.
- ☒ **19 copies of photograph are attached as requested.**
- ☐ The Sketch Plan will be sent in due course.
- ☐ There is no Police Report for the vehicle no: _____

Yours Faithfully

for HEAD INVESTIGATION
TRAFFIC POLICE DEPARTMENT
*Delete where inapplicable



**SINGAPORE
POLICE FORCE**

Traffic Police
10 Ubi Ave 3
Singapore 408865
Tel: 65476243/6244
Fax: 65474749

Date: 10/11/2016

Your Ref: Please advise

Our Ref: TP00092951/SU
TP/IP/29079/2016

M/s JAY LAW CORPORATION
101 UPPER CROSS STREET
04-17A
PEOPLE'S PARK CENTRE
SINGAPORE 058357



Dear Sir / Madam
Attn: Ms Mumtaj Banu

**ACCIDENT INVOLVING VEHICLES NO. FATAL – SJD5210M & PEDESTRIAN ON
7/6/2016**

I refer to your e-application on 9/11/2016. I wish to draw to your attention to the item(s) marked "X" hereunder:-

☐ Please be informed that Traffic Police will not be investigating into the accident as it is a non-injury case which did not fall within the various categories of exceptions. You may wish to know that this is pursuant to the Non-Injury Accident Reporting Scheme which was implemented on 1 May 1999.

☐ This case is still under investigation. The investigation officer is _____ Tel: _____

☐ No action is being taken against anyone in this case. This does not preclude further prosecution should new evidence emerge later. Our findings do not affect insurance and civil claims.

☒ **Action is being taken against the driver of SJD5210M for causing death by reckless/dangerous driving.**

☐ The driver of _____ has been issued a warning for careless driving.

☐ The driver of _____ has pleaded guilty on _____ in court _____ for careless driving.

☒ **A copy of report No. T/20160625/2077, first information report and sketch plan are attached.**

☐ The other documents that you requested for are not available in this case.

☐ Please be informed that Traffic Police would not be investigating into the accident as it occurred outside Singapore, which was not under our jurisdiction.

Yours faithfully

 **SURIATI BTE BUANG**

for HEAD INVESTIGATION
TRAFFIC POLICE
*delete where inapplicable

Drawn Not To Scale



| Legend | |
|--------|-----------------------------------|
| 1 | ● bollard |
| 2 | ● bollard cap |
| 3 | chipped and scratched mard |
| 4 | ● bollard holder |
| 5 | gouge mark @ road kerb |
| 6 | scratch mark and debris |
| 7 | tyre mark |
| 8 | end of tyre mark |
| 9 | m/car SJD 5210 M 4.3 m X 1.9 m |
| A | bloodstain 1.3 X 0.3 m |

Certified True Copy
pursuant to Sec. 78 of the
Evidence Act, Cap 97.

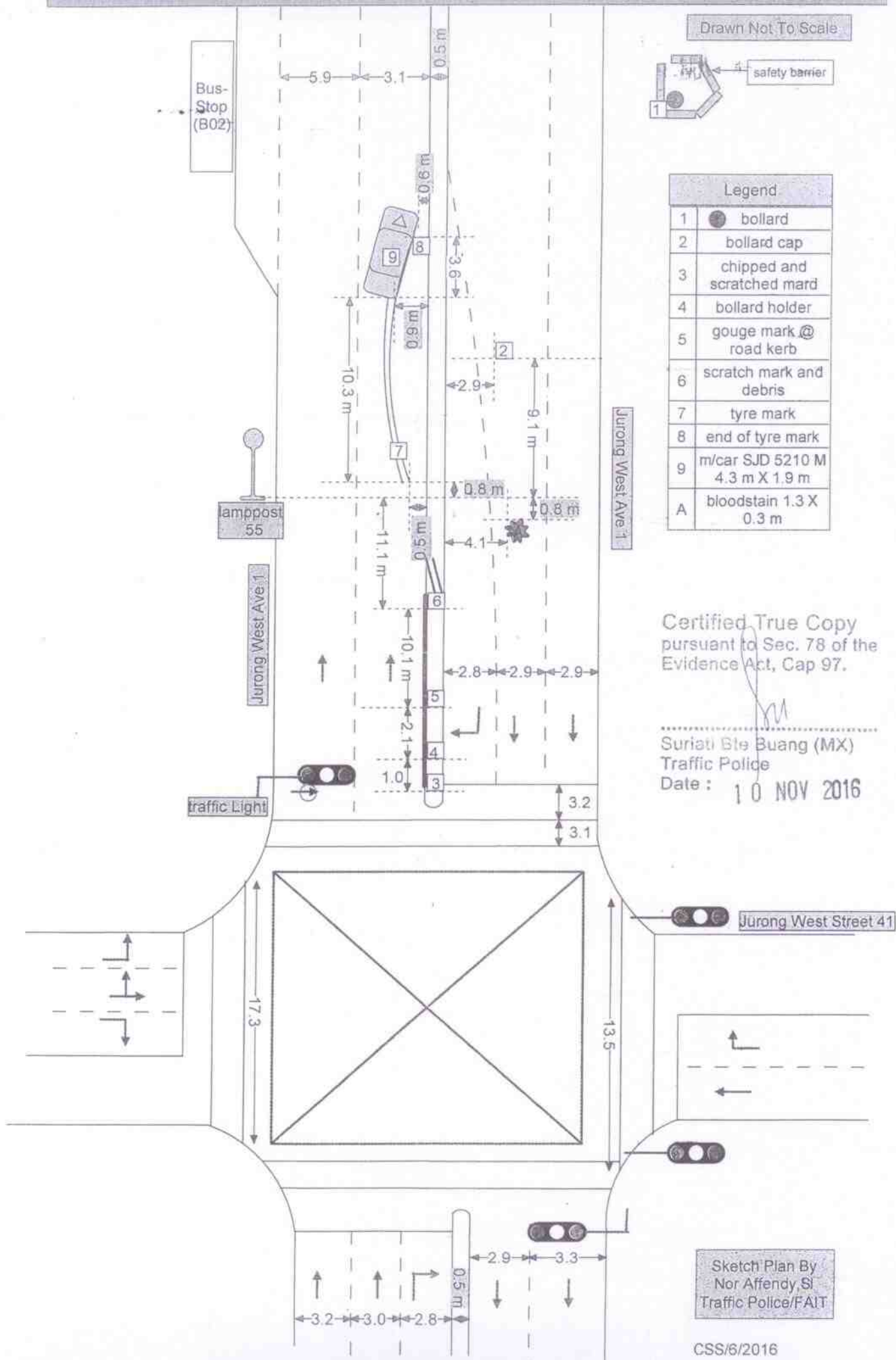
Suriati Bte Buang (MX)
Traffic Police

Date : 10 NOV 2016

Jurong West Street 41

Sketch Plan By
Nor Affendy, SI
Traffic Police/FAIT

CSS/6/2016



CONFIDENTIAL



**SINGAPORE
POLICE FORCE**



J/20160607/0201

**FIRST INFORMATION REPORT
CASE OF TP - RTA (FATAL/SERIOUS)**

REF:J/20160607/0201

VIDE:

Call Information

Time of Call: **Tuesday, 07 June 2016 21:07:05 to 21:09:47**
Time of Incident: **Tuesday, 07 June 2016 21:09:22**
Time of Incident Creation: **Tuesday, 07 June 2016 21:09:47**

Caller ID:

Subscriber Name:

Subscriber Address:

Subscriber Phone Type: **Not Applicable**

Special Remarks: **-**

Incident Created By: **Md Akashah Bin Haripen at WT1-0115**

Source Type: **995**

Priority: **Non-urgent**

First Information

Caller Name: **F/CALLER**

Caller Supplied Location: **APT BLK 429 Jurong West Ave 1 HDB-JURONG WEST SINGAPORE
640429**

Location Remarks: **ROAD JUNCTION**

Contact Number:

Language Used: **English**

Text of Message:

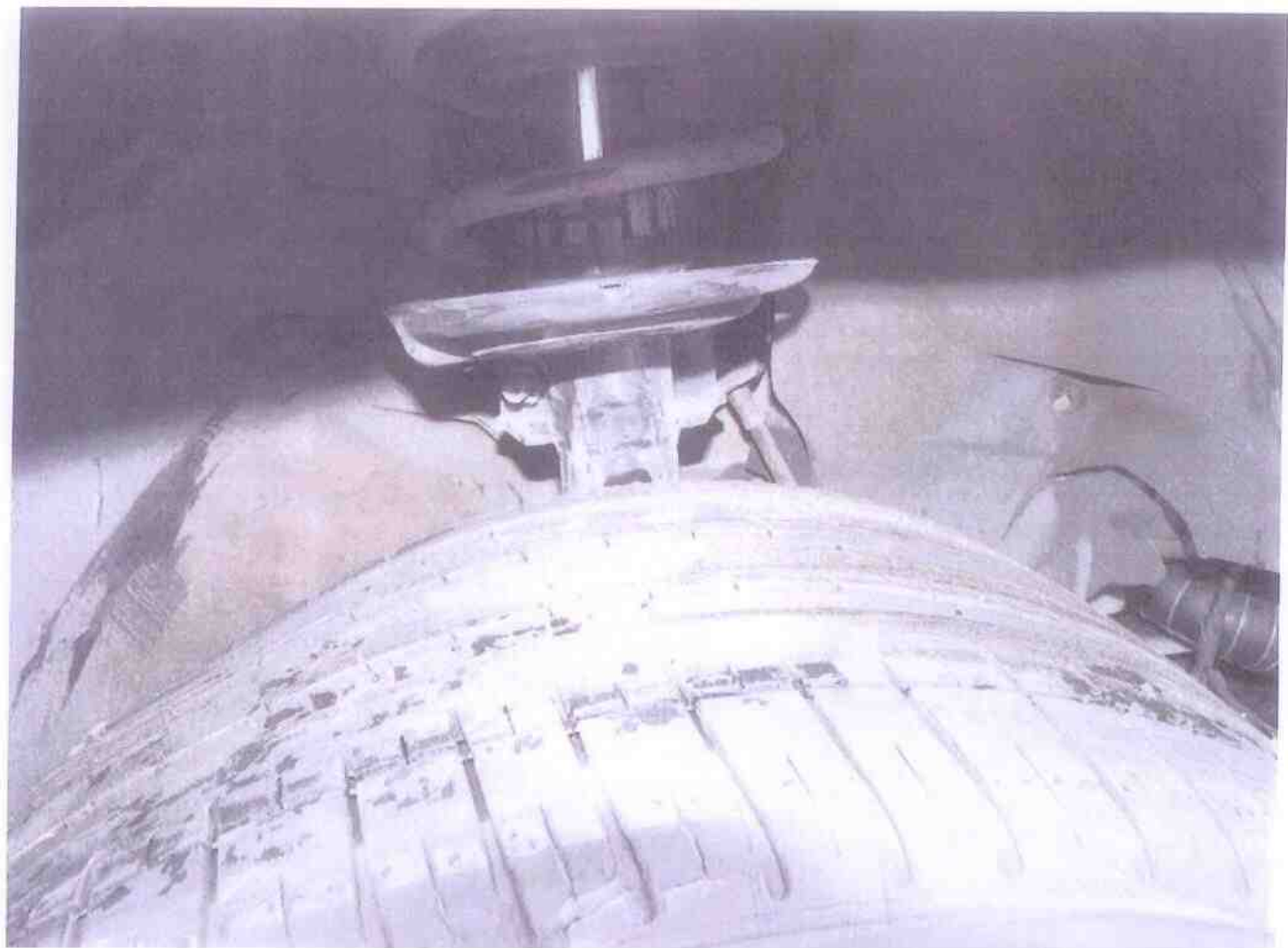
SCDF/876 - RTA - CAR & LADY PEDESTRIAN

CERTIFIED TRUE COPY

**for HEAD INVESTIGATION
TRAFFIC POLICE**









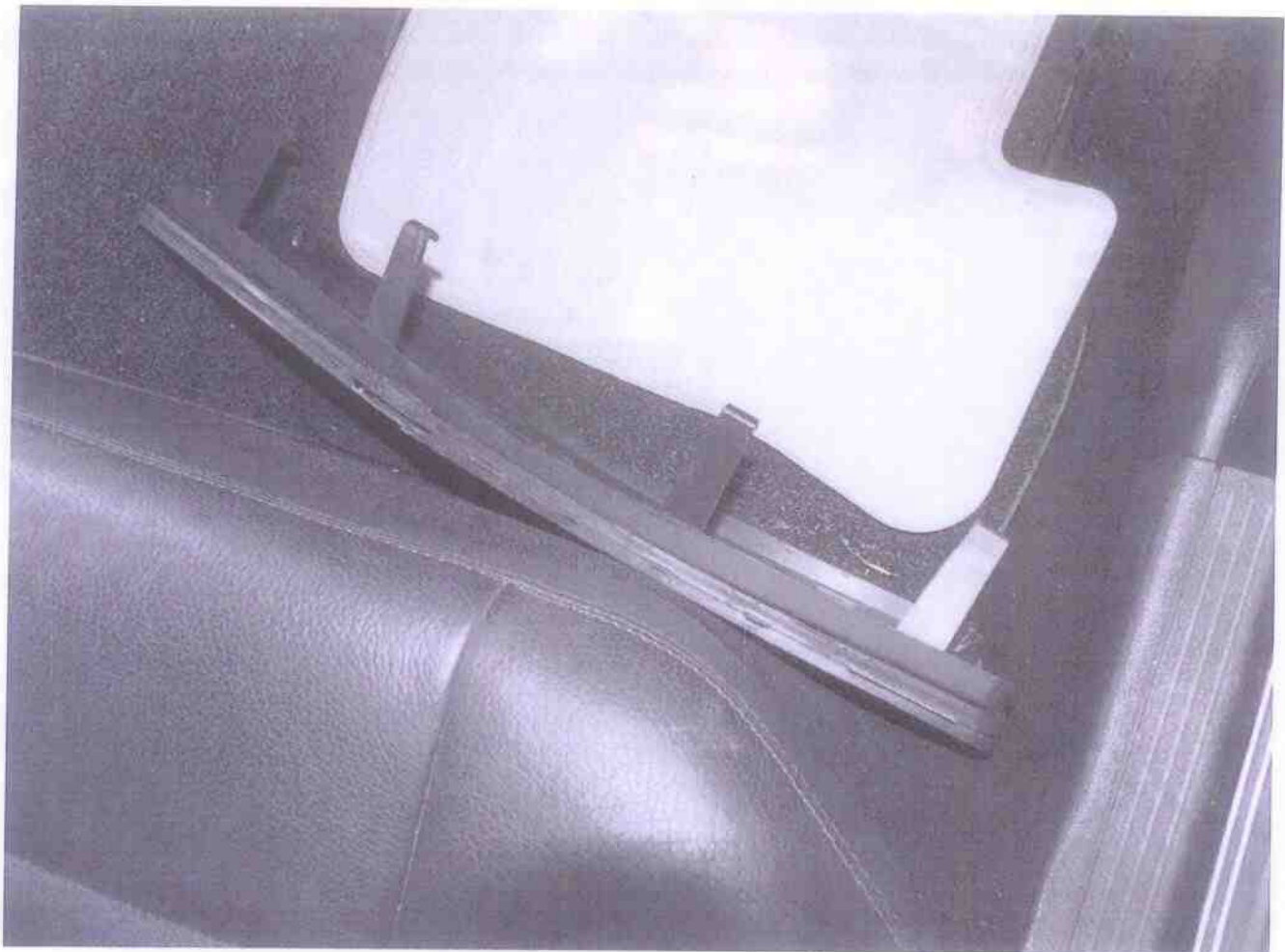




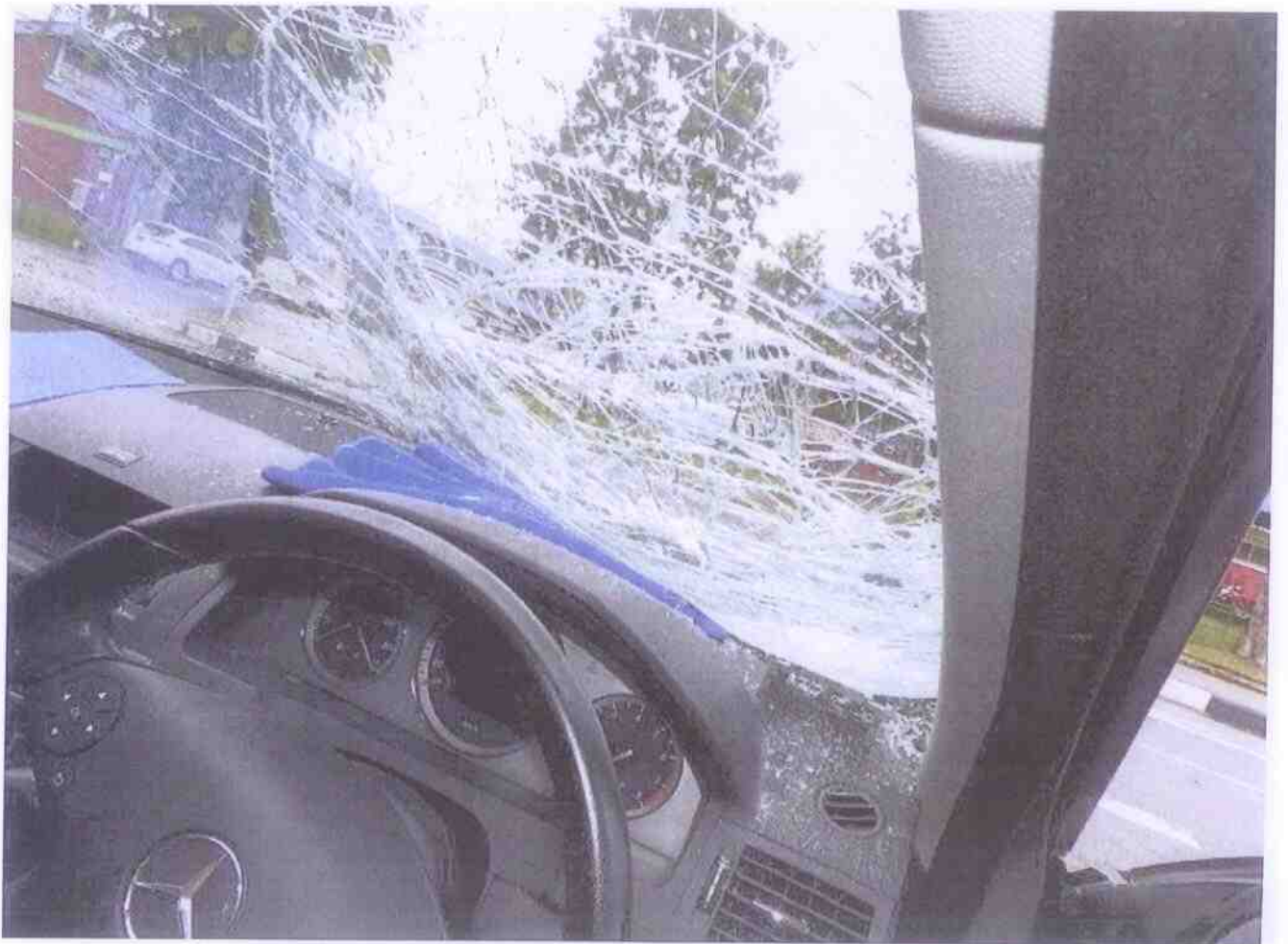


















Accident Photo



Accident Photo



Accident Photo





SINGAPORE POLICE FORCE

Police Station Of Origin:
Teck Ghee NPP
321 Ang Mo Kio Street 31 SINGAPORE
560321
Tel No: 1800-4599999

Certified True Copy
pursuant to Sec. 78 of the
Evidence Act, Cap 97.



T/20160625/2077

1 of 3

Report No. T/20160625/2077

Suriati Bte Buang (MX)
Traffic Police
Date: 10 NOV 2016

REPORT OF A TRAFFIC ACCIDENT

| | | | | | |
|---|------------|------------------------------|--|--------------------------|----------------------------|
| Date/Time Report Made: 25/06/2016 13:30 | | Vide Report No.: | | Station Diary No.: 16 | |
| Informant's Particulars | | | | | |
| Name of Informant: LIU LI-LIU | | | Address: APT BLK 311 ANG MO KIO AVENUE 3 #15-2118 SINGAPORE 560311 | | |
| ID Type / ID No.: NRIC NO / S7619538B | | | Contact No.: Home/Office: Mobile: 81113503 | | |
| Nationality: SINGAPORE CITIZEN | | | Email: | | |
| Sex: Male | Age: 39 | Date of Birth: 26/06/1976 | Type of Informant: Driver | | |
| Race: Chinese | | | Language: English | | Institution / School Name: |
| Occupation: Building and construction project manager | | | Driving Licence Information: Class: 3 Date of Expiry: | | |

General Information of the Accident

| | | | | |
|---|------------------------------|---|---|--|
| Type of Accident: | Injury Attended by Police | Drink Drive: No | Date/Time of Accident: 07/06/2016 20:45 | Type of Location: Straight Road |
| Location: Along Road 1 JURONG WEST STREET 42 | | | | |
| Weather: Clear | | Road Surface: Dry | | Road Speed Limit: |
| Traffic Flow: Two Way | | Traffic Control: Traffic Light - Working | | Traffic Volume: Moderate |
| Type of Collision: Moving Vehicle Against - Others | | | | Anyone conveyed by ambulance: No |

Details of Vehicle Involved

| Vehicle No. | Type | Make | Model | Color | Condition | No of |
|-------------|------|------|-------|-------|---------------------|-------|
| SJD5210M | Car | | | | Slightly Damaged | 0 |

Details of Person Involved

| | |
|-------------------------------|--------------------------------------|
| Any Pedestrian Involved: Yes | |
| No. of Pedestrians Injured: 1 | Use of Pedestrian Crossing: Not Used |



Police Station Of Origin:
Teck Ghee NPP
321 Ang Mo Kio Street 31 SINGAPORE
560321
Tel No: 1800-4599999

2 of 3

Report No. T/20160625/2077

CONTINUATION OF REPORT

| Driver | | | |
|-----------------------------------|----------------|--|---------------------------------|
| Name | LIU LI-LIU | ID No. | S7619538B |
| Related Vehicle | SJD5210M (Car) | Contact No. | 81113503 |
| Hospital/Clinic | NIL | Class of Driving Licence & Expiry Date | Class: 3 Date of Expiry: NIL |
| Date Treatment | NIL | Date Discharge | NIL |
| No. of Days granted Medical Leave | NIL | Degree of Injury | NIL |

Brief Details.

On 7/6/16 at about 2045hrs I was travelling in my vehicle (SJD5210M) along Jurong West Street 42 on the first lane. When I was near to Blk 492 Jurong West Street 42, I saw a lady standing at the middle divider few meters away however she was standing still there. I was driving my vehicle not more than 50kmh. As my vehicle was approaching her, she suddenly took a few steps down to the road as such I tried to brake however could not brake in time. As a result I hit onto the lady and she was thrown to the next side of the road. I then quickly stopped my vehicle and came out to check on her. The lady was unconscious and was bleeding from the head.

I then called for ambulance through a passer-by's phone. The ambulance came after few minutes and traffic police was also at scene. They then placed me under arrest however I am not sure on the exact offence.

My vehicle's front right side bumper, bonnet and the windscreen was damaged due to the impact.

Certified True Copy
pursuant to Sec. 78 of the
Evidence Act, Cap 97.

.....
Suriati Bte Buang (MX)
Traffic Police

Date : 10 NOV 2016



**SINGAPORE
POLICE FORCE**



T/20160625/2077

Police Station Of Origin:
Teck Ghee NPP
321 Ang Mo Kio Street 31 SINGAPORE
560321
Tel No: 1800-4599999

3 of 3

Report No. T/20160625/2077

CONTINUATION OF REPORT

Sketch Plan

Informant is not able to provide sketch plan

Certified True Copy
pursuant to Sec. 78 of the
Evidence Act, Cap 97.

Suriati Bte Buang (MX)
Traffic Police

Date : 10 NOV 2016

IMPORTANT: Please attach a copy of your vehicle's Insurance Certificate to this report. If you don't have the certificate with you now, please fax a copy to 65474885 stating the **report number** as reference.

Signature Of Officer Recording The Report:
F /
Sgt RAMESH S/O KOLILINGAM

Signature Of Interpreter:
Not applicable

Officer In Charge Of Case:
TP / GIT /

Contact No.:

Authentication Stamp
NP168

Signature Of Informant:

Date/Time:
25/06/2016 13:30

Classification Of Case:

K.KIM HIN AUTO PTE LTD

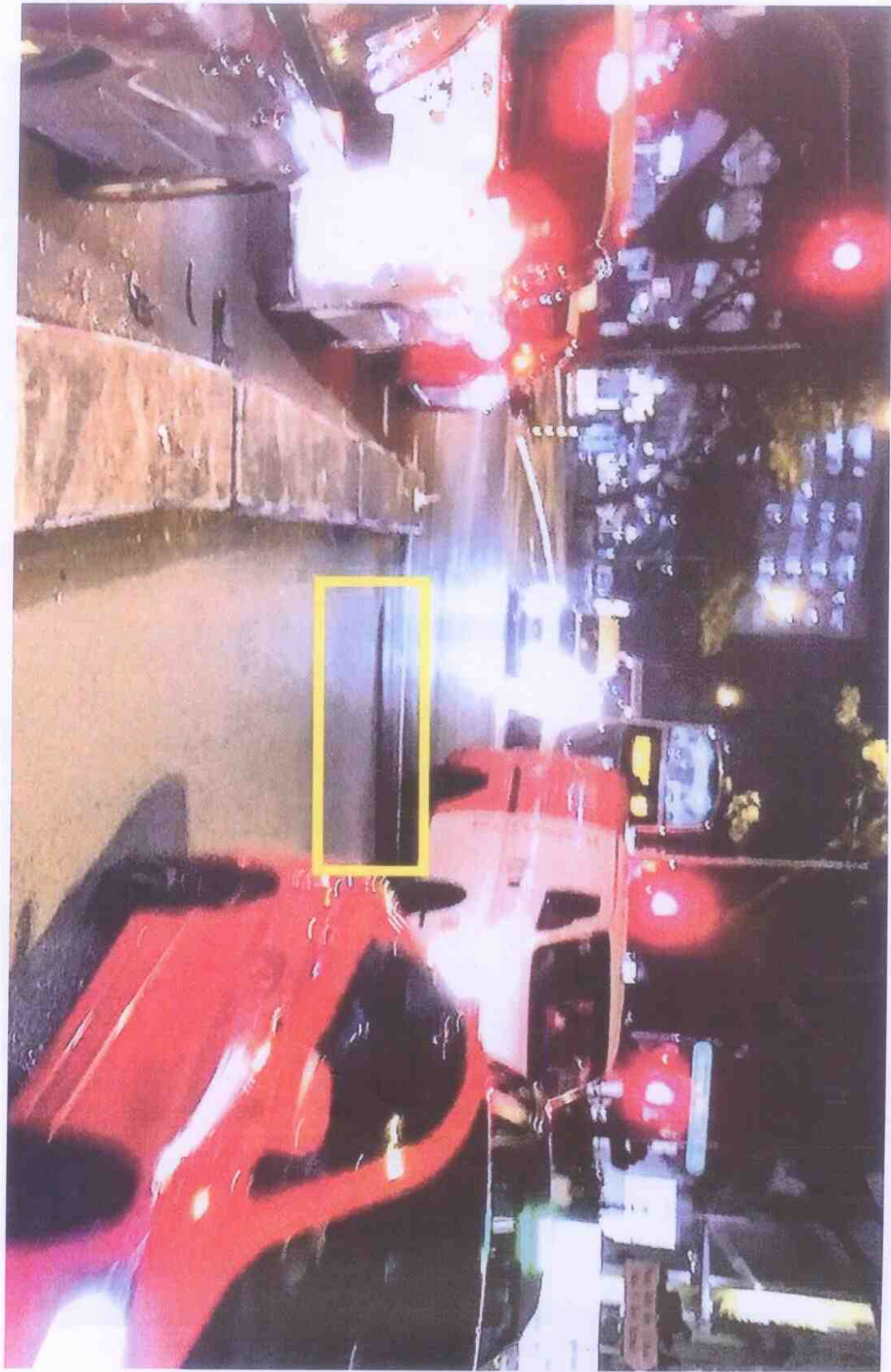
Claim Reference:
Assessment Number: KKHC0081
Version: K.KIMHIN/1

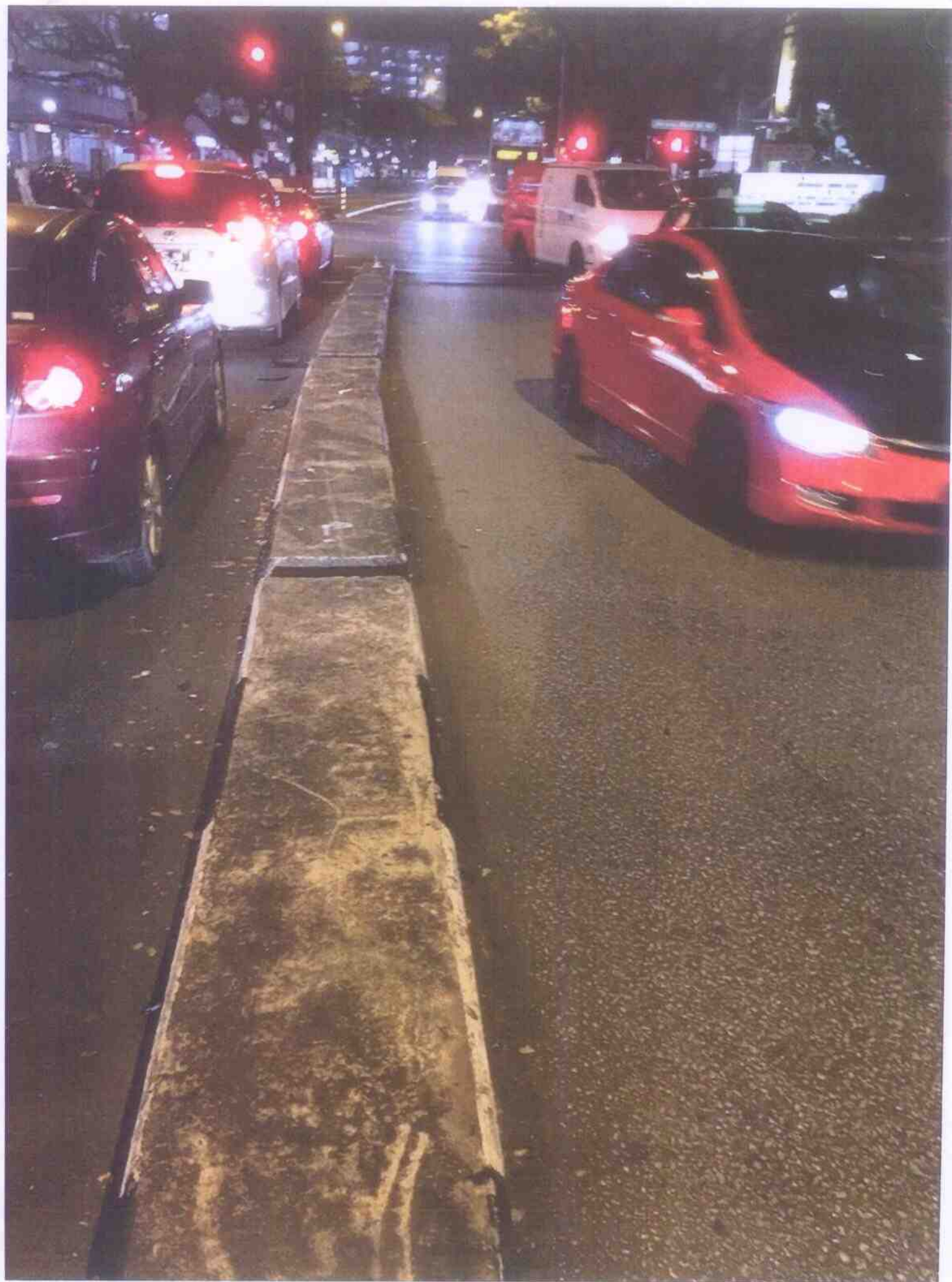
Full Report - V1
Registration: SJD5210M
Printed: 19/07/2016 18:58

| | |
|------------------------------------|----------|
| Surface Paint Plastic | \$45.02 |
| Repair Painting | \$96.79 |
| Material-Const Main Work Plastic | \$9.00 |
| Total Excluding Pearlescent Uplift | \$439.61 |
| Pearlescent Uplift @ 0.0% | \$0.00 |
| Total Paint Material Cost | \$439.61 |

PARTS

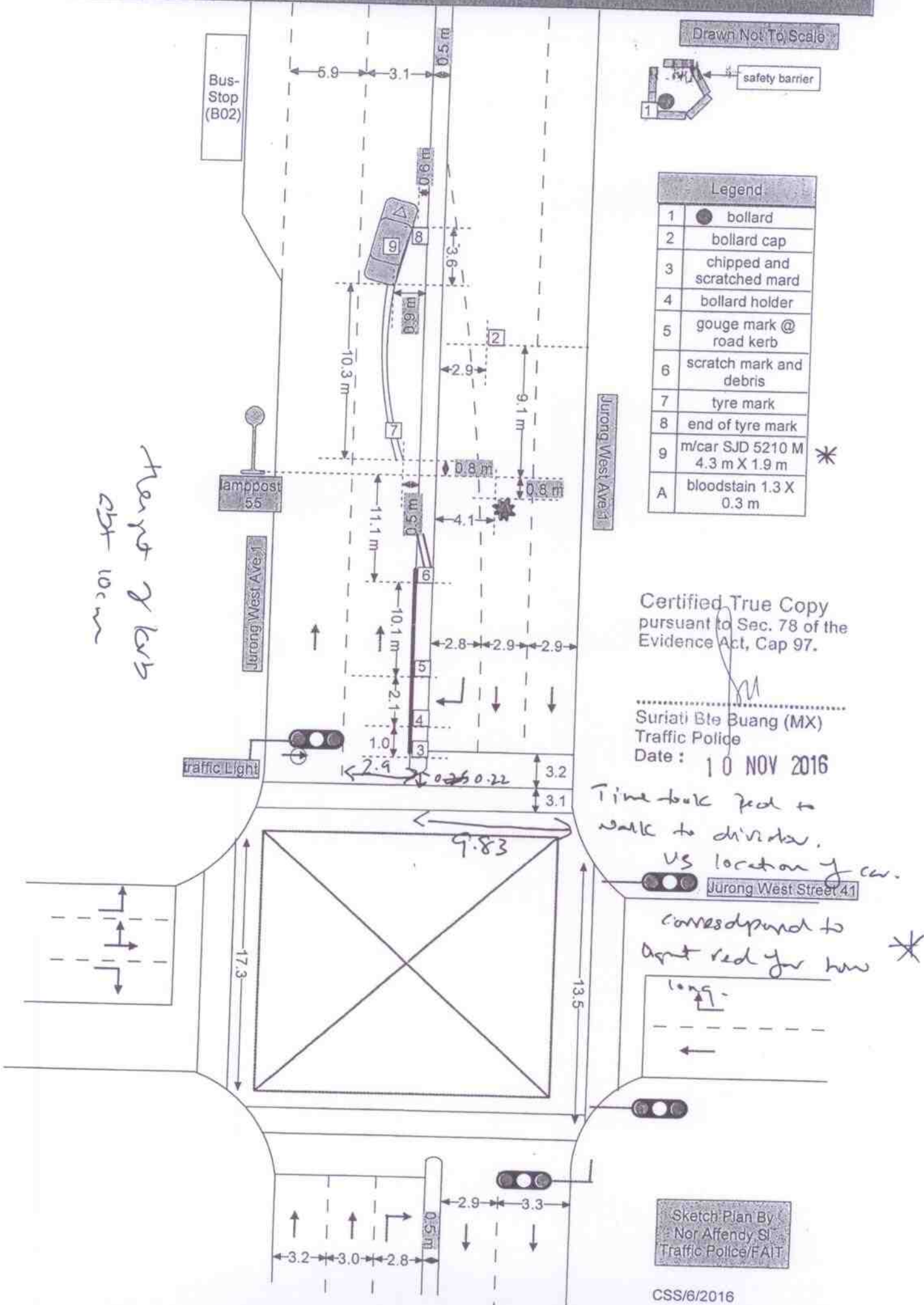
| Guide No. | Qty | Description | Part Number | Supplier | Price Valid: 01/06/2015 | Bet. | Price (\$) |
|-----------|-----|---|--------------------------------------|----------|-------------------------|------|------------|
| 258 | 1 | FRT NO PLATE BACKG ✓ <i>Handwritten</i> | 204 817 0378 | | 0% | | 70.00* |
| 283 | 1 | FRONT BUMPER COVER ✓ <i>Handwritten</i> | 204 885 0825 9999 | | 0% | | 670.00* |
| 304 | 1 | R/F BUMPER COVER ✓ <i>Handwritten</i> | 204 885 2523 | | 0% | | 33.00* |
| 305 | 1 | FRONT BUMPER GRILLE ✓ <i>Handwritten</i> | 204 885 2123 | | 0% | | 52.00* |
| 308 | 1 | R/F COVER ? | 204 885 1474 | | 0% | | 58.00* |
| 311 | 1 | L/F BUMPER MOULDING ✓ <i>Handwritten</i> | 204 885 0721 | | 0% | | 50.00* |
| 312 | 1 | R/F BUMPER MOULDING ✓ <i>Handwritten</i> | 204 885 0821 <i>Handwritten</i> | | 0% | | 50.00* |
| 336 | 1 | FRONT IMPACT DAMPER ? | 204 885 0065 | | 0% | | 55.00* |
| 349 | 1 | FRT/CTR IMPACT DAMP ? | 204 885 0037 | | 0% | | 90.00* |
| 405 | 1 | FRONT GRILLE ✓ <i>Handwritten</i> | 204 880 0023 9744 <i>Handwritten</i> | | 0% | | 320.00* |
| 431 | 1 | BADGE ✓ <i>Handwritten</i> | 204 817 0616 | | 0% | | 38.00* |
| 435 | 1 | BONNET SEAL ✓ <i>Handwritten</i> | 204 881 0098 | | 0% | | 25.00* |
| 471 | 1 | BONNET ✓ <i>Handwritten</i> | 204 880 1057 64 | | 0% | | 770.00* |
| 475 | 1 | LEFT BONNET HINGE ✓ <i>Handwritten</i> | 204 880 0728 | | 0% | | 58.00* |
| 476 | 1 | RIGHT BONNET HINGE ✓ <i>Handwritten</i> | 204 880 0828 | | 0% | | 58.00* |
| 481 | 1 | BONNET INSULATION ✓ <i>Handwritten</i> | 204 682 0626 | | 0% | | 138.00* |
| 493 | 1 | RADIAT GRILLE MOUNTG ? | 204 885 0136 | | 0% | | 15.00* |
| 494 | 1 | BONNET CATCH ✓ <i>Handwritten</i> | 204 880 0064 | | 0% | | 50.00* |
| 497 | 1 | L/F BONNET STRUT ✓ <i>Handwritten</i> | 204 980 2164 | | 0% | | 58.00* |
| 498 | 1 | R/F BONNET STRUT ✓ <i>Handwritten</i> | 204 980 0964 | | 0% | | 58.00* |
| 500 | 1 | BONNET CABLE ? | 204 880 0059 | | 0% | | 45.00* |
| 504 | 1 | R/BONNET CATCH ✓ <i>Handwritten</i> | 204 880 0060 | | 0% | | 36.00* |
| 507 | 1 | L/SPRING ELEMENT ✓ <i>Handwritten</i> | 204 880 0227 | | 0% | | 13.00* |
| 508 | 1 | R/SPRING ELEMENT ✓ <i>Handwritten</i> | 204 880 0227 | | 0% | | 13.00* |
| 516 | 1 | R/BONNET LOCK ✓ <i>Handwritten</i> | 204 880 0260 | | 0% | | 45.00* |
| 562 | 1 | RIGHT HEADLAMP ASSY ✓ <i>Handwritten</i> | 204 820 3259 <i>Handwritten</i> | | 0% | | 530.00* |
| 638 | 1 | R/F FOG LAMP ✓ <i>Handwritten</i> | 169 820 1656 | | 0% | | 130.00* |
| 741 | 1 | L/F WING ✓ <i>Handwritten</i> | 204 880 1318 | | 0% | | 400.00* |
| 742 | 1 | R/F WING ✓ <i>Handwritten</i> | 204 880 1418 | | 0% | | 400.00* |
| 746 | 1 | R/F WING COVER ✓ <i>Handwritten</i> | 204 889 0225 | | 0% | | 25.00* |
| 763 | 1 | L/F INTERM PIECE ? | 204 889 0195 | | 0% | | 20.00* |
| 764 | 1 | R/F INTERM PIECE ? | 204 889 0295 | | 0% | | 20.00* |
| 785 | 1 | L/F WING MOULDING ✓ <i>Handwritten</i> | 204 690 3162 | | 0% | | 23.00* |
| 786 | 1 | R/F WING MOULDING ✓ <i>Handwritten</i> | 204 690 3262 | | 0% | | 23.00* |
| 790 | 1 | R/F WING CLAMP KIT ✓ <i>Handwritten</i> | USE SINGLE PARTS | | 0% | | 45.00* |
| 811 | 1 | L/F WING BADGE ✓ <i>Handwritten</i> | 204 817 7220 | | 0% | | 50.00* |
| 812 | 1 | R/F WING BADGE ✓ <i>Handwritten</i> | 204 817 7220 | | 0% | | 50.00* |
| 839 | 1 | L/F W-HOUSE CVR FRT ✓ <i>Handwritten</i> | 204 690 5730 | | 0% | | 95.00* |
| 840 | 1 | R/F W-HOUSE CVR FRT ✓ <i>Handwritten</i> | 204 690 5630 <i>Handwritten</i> | | 0% | | 95.00* |
| 842 | 1 | R/F W-HOUSE CVR REAR ✓ <i>Handwritten</i> | 204 690 5030 <i>Handwritten</i> | | 0% | | 68.00* |
| 930 | 1 | CTR FRT REINF ✓ <i>Handwritten</i> | 204 620 0272 | | 0% | | 68.00* |
| 988 | 1 | FRONT BRACKET ✓ <i>Handwritten</i> | 204 880 0164 | | 0% | | 50.00* |
| 1001 | 1 | FRT LWR CROSSMEMBER ✓ <i>Handwritten</i> | 207 620 1600 | | 0% | | 165.00* |
| 1007 | 1 | L/F BUMP IMPACT DAMP ✓ <i>Handwritten</i> | 204 620 1195 | | 0% | | 145.00* |
| 1008 | 1 | R/F BUMP IMPACT DAMP ✓ <i>Handwritten</i> | 204 620 0995 | | 0% | | 145.00* |
| 1180 | 1 | R/F UPP REINF ? | 204 620 1091 | | 0% | | 130.00* |







SKETCH PLAN OF ROAD TRAFFIC ACCIDENT SCENE AT ALONG JURONG WEST AVENUE 1 TOWARDS JURONG TOWN HALL ROAD, NEAR LAMPPOST 55, ON 7 TH JUNE 2016 INVOLVING MCAR S/D 5210 M AND PEDESTRIAN



Sketch Plan By
Nor Affendy S
Traffic Police/FAIT

CSS/6/2016

Need to establish : —

- 1.) POI
- 2.) Where deceased was standing?? along where??
- 3.) Drive come from where?? heading to where??
- 4.) Familiar with road along that stretch??
- 5.) What is his speed??
- 6.) Visibility?? Lighting condition??
- 7.) Head light on??
- 8.) Drink driving??
- 9.) Colour of Traffic light facing him?? Traffic condition??
- 10.) Witness??
- 11.) What he told Police??
- 12.) Deceased approaching from right to left??
- 13.) ~~Did~~ impact what he did?? brake?? mount kerb??
one side or all??
- 14.) ~~Did~~ mount kerb hit deceased or hit deceased than mount
kerb??

Points to use.

- Where the pole ~~lost~~ found??
- Caused by car?? or pre-existing??
- If mount kerb, damage to lower part of front bumper??
- Slipper ignore as not recorded evidence.
- Traffic light sequence of ~~at~~ junction.

Interview done on 23/08/17 @ 1730w - 1630w

- Start of journey from AMK (his house) heading to Swing East.
Took wrong ~~turn~~ exit so ended up at the accident location.
- Throttle on, usually drive this car registered in his father's name. no drink driving.
- on the centre lane speed abt 70kmph. Traffic moderate.
No cars in front of him. Not sure if got cars on his left lane or right lane.
- Traffic light showing green at ~~last~~ last arrow. entered junction
Just ~~seen~~ saw red at the first pedestrian crossing line.
- insist that he moved left then hit red.
- Ped standing on divider kerb after the junction. When he saw red, he just carry on normal w/o accelerating.
- Quite near he saw some action from ped and quickly jam ~~the~~ brake. hit ped then stop all the while while jamming brake.
- stop when he decreased and used other ppl phone to call 995. Ped was unconscious.
- As far as he know, no witness. However at TP, I told him that there was witness who saw him beat red light.
- cant remember color of ped clothes.
- Don't usually travel this road.