

UNITED STATES DISTRICT COURT  
for the  
NORTHERN DISTRICT OF ILLINOIS

**SUBPOENA TO TESTIFY BEFORE A GRAND JURY**

**To:** Custodian of Records  
Office of Speaker Michael J. Madigan  
300 State House  
Springfield, Illinois 62706

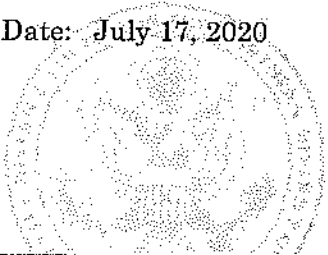
**YOU ARE COMMANDED** to appear in this United States District Court at the time, date, and place shown below to testify before the Court's Grand Jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

<b>Place:</b> Dirksen Federal Building, Rm. 1625 219 S. Dearborn Chicago, Illinois 60604 Grand Jury: SPECIAL JANUARY 2019 GRAND JURY (14 GJ 393)	<b>Date and Time:</b> July 29, 2020 9:30 a.m.
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You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

See Attachment A.

Date: July 17, 2020



CLERK OF COURT

A handwritten signature in cursive script, reading "Thomas G. Butler".

*Signature of Clerk or Deputy Clerk*

The name, address, e-mail and telephone number of the United States Attorney, or Assistant United States Attorney, who requests this subpoena, are:

Amarjeet S. Bhachu  
Assistant United States Attorney  
219 S. Dearborn, Rm. 500  
Chicago, Illinois 60604  
(312) 469-6212

ATTACHMENT A

**Grand Jury Subpoena – Office of Speaker Michael J. Madigan  
(14 GJ 393)**

I. Definitions

- a. The term “communication” as used herein means any letter; memorandum; electronic mail message; text message; instant message; voice mail message; social media message; facsimile; or any other record (whether in written, photographic, audio, or video form) containing a conveyance of information from one party to another.
- b. The term “document” as used herein should be interpreted broadly to mean any recorded information (whether in written, photographic, audio, or video form), to include, without limitation, any communication (as described above), whether stored electronically or in hard copy form.

II. General Instructions

- a. You are required to produce all items which are responsive, in whole or in part, to any description set forth in this Attachment, regardless of where located, that are in your possession, custody, or control, or in the possession, custody or control of any of your partners, associates, employees, agents, representatives, accountants, or attorneys, along with all copies of any such document which differ from the original by virtue of any addition, deletion, alteration, notation, or inscription on any part of the document, including its back.
- b. Unless otherwise indicated, the documents requested include all documents prepared, sent, dated, received, in effect, or which otherwise came into existence at any time during the subpoena period.
- c. Electronically-stored documents should be produced in their “native” electronic format according to the attached *Litigation Support Specifications*. Please contact the U.S. Attorney’s Office prior to production should you have any questions about the protocol or formatting for producing documents.
- d. You may provide originals or copies of paper records. If you produce copies, please scan the hard copies and produce them in an electronic format that meets the attached *Litigation Support Specifications*, and preserve all original paper records. If copies of a document differ in any way, they are considered separate documents and you must produce

each copy.

- e. Each responsive document produced, including every version, draft, or copy of the document, should be produced in such a manner that the original location and custodian of the document is readily identifiable to the Government upon review.
- f. Every document produced should be "Bates" numbered in a sequential manner for tracking purposes.
- g. Please provide a log of each responsive document not produced on the basis of any privilege, protective doctrine, or any other reason.
- h. The time period covered by this subpoena shall be from January 1, 2010, to the date of service of this subpoena.

### III. Documents to be Produced

- 1. All documents and communications related to any efforts to seek, recommend, or obtain a contract or any other form of employment for any precinct captain for the City of Chicago's 13th Ward; any spouse or child of a precinct captain for the 13th Ward; or any individual who worked on an election campaign for the benefit of or at the request of Michael J. Madigan, Frank Olivo, Michael R. Zalewski or Martin Quinn; including contracts or employment with private or public entities.
- 2. All documents and communications related to or concerning Edward Acevedo, Edward M. Moody, Raymond Nice, Frank Olivo, and/or Michael R. Zalewski, including but not limited to documents and communications regarding efforts to give, seek, recommend, secure, or obtain a benefit of any form, including contracts, payments, or employment for those individuals or their spouses or children.
- 3. Any and all documents and communications with or concerning Exelon Corporation ("Exelon") or Commonwealth Edison Company ("ComEd"), other than routine utility bills, including any current or former Exelon or ComEd subsidiaries, affiliated business entities, consultants, lobbyists, agents or employees, including but not limited to Fidel Marquez, Anne Pramaggiore, John T. Hooker, Frank Clark, Jay Doherty, Will Cousineau, Shaw Decremer and John Bradley. Such records include, but are not limited to, any and all contracts, agreements, letters of engagement, and correspondence related to the retention, hiring or engagement of any person to provide services, including lobbying, consulting or other services to Exelon or ComEd.

4. Any and all documents and communications with or concerning Michael McClain.
5. Any and all documents and communications with or concerning the employment by Exelon or ComEd of Raymond Nice, Ray Nice Business Services, Frank Olivo, Jr., Edward Moody, Michael Zalewski, The Z Consulting Group, Inc., Edward Acevedo, Reyes Kurson Ltd., The Roosevelt Group, or Apex Strategy LLC.
6. Any and all documents and communications concerning the appointment or potential appointment of any individual to the ComEd Board of Directors, including but not limited to Juan Ochoa.
7. Any and all documents and communications with or concerning AT&T Services, Inc., or AT&T of Illinois, other than routine telephone bills, including any current or former AT&T Services, Inc.'s, or AT&T of Illinois' parents, subsidiaries, affiliated business entities, consultants, lobbyists, agents or employees. Such records include, but are not limited to, any and all contracts, agreements, letters of engagement, and correspondence related to the retention, hiring or engagement of any person to provide services, including lobbying, consulting or other services to AT&T of Illinois or any of its parents, subsidiaries, or affiliated business entities.
8. Any and all documents and communications with or concerning Walgreens Company ("Walgreens"), including any current or former Walgreens' parents, subsidiaries, affiliated business entities, consultants, lobbyists, agents or employees. Such records include, but are not limited to, any and all contracts, agreements, letters of engagement, and correspondence related to the retention, hiring or engagement of any person to provide services, including lobbying, consulting or other services to Walgreens or any of its parents, subsidiaries, or affiliated business entities.
9. Any and all documents and communications with or concerning Rush University Medical Center ("Rush") and each of its subsidiaries and affiliated business entities, entities operating under any of its assumed names, and any current or former Rush consultants, lobbyists, agents or employees. Such records include, but are not limited to, any and all contracts, agreements, letters of engagement, and correspondence related to the retention, hiring or engagement of any person to provide services, including lobbying, consulting or other services to Rush or any of its parents, subsidiaries, or affiliated business entities.

10. Any and all documents and communications concerning the property located at the northeast corner of Cermak Road and Wentworth Avenue, in Chicago, Illinois, PINs 17-21-421-028 and 17-21-421-029, 17-21-421-030, and 17-21-422-010 (hereinafter, the "Chinatown parcel"), including but not limited to documents or communications (i) concerning contemplated or proposed legislation relating to the Chinatown parcel; (ii) from or to Michael Madigan, Martin Sandoval, or any other elected public official or their staff concerning the Chinatown parcel; (iii) from or to any member of the Illinois Department of Transportation or any other public employee concerning the Chinatown parcel; (iv) from or to Michael McClain or Nancy Kimme concerning the Chinatown parcel; and (v) concerning Senate Bill 3247.
11. Any and all documents and communications from January 1, 2018, to the present concerning any and all efforts to give, seek, recommend, secure, or obtain a benefit of any form, including contracts, payments, or employment for Kevin Quinn.
12. Any and all documents and communications with or concerning former Alderman Daniel Solis, including but not limited to any and all communications concerning (i) introductions and legal client referrals made by Solis to Michael Madigan and Madigan & Getzendanner; and (ii) Solis's placement on any Illinois State board or in any other Illinois State position.



U.S. Department of Justice

United States Attorney  
Northern District of Illinois

Amarjeet S. Bhachu  
Assistant United States Attorney

Dirksen Federal Courthouse  
219 South Dearborn Street, Fifth Floor  
Chicago, IL 60604

Direct Line: (312) 469-6212  
E-mail: amarjeet.bhachu@usdoj.gov

July 17, 2020

Custodian of Records  
Office of Speaker Michael J. Madigan  
300 State House  
Springfield, Illinois 62706

Re: Subpoena Duces Tecum - 14 GJ 393

The accompanying federal grand jury subpoena seeks records pursuant to an official criminal investigation.

In lieu of producing the records at the location and time specified on the subpoena, the subpoenaed records may be sent on or before that date to my attention at the above address.

Please complete the attached Declaration Certifying Records of Regularly Conducted Activity, if applicable, and return it with the records. Returning the completed form may reduce the likelihood of your having to appear in person in court in the future.

If you have any questions about this matter, please feel free to contact me at (312) 469-6212. Thank you for your assistance.

Very truly yours,

JOHN R. LAUSCH, JR.  
United States Attorney

By: Amarjeet S. Bhachu  
Amarjeet S. Bhachu  
Assistant United States Attorney