## UNITED STATES DISTRICT COURT for the NORTHERN DISTRICT OF ILLINOIS

#### SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Thornton Township

Attn: Custodian of Records

333 E 162nd St

South Holland, IL 60473

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.

Place:

Everett McKinley Dirksen

United States Courthouse, Rm. 1625

219 S. Dearborn

Chicago, Illinois 60604

Grand Jury: SPECIAL NOVEMBER 2023 GRAND JURY 23 GJ 547

**Date and Time:** 

May 20, 2024 9:30 a.m.

You must also bring with you the following documents, electronically stored information, or objects (blank if not applicable):

See Attachment.

CLERK OF COURT

Signature of Clerk or Deputy Clerk

Thomas S. South

Date: April 25, 2024

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

BRIAN P. NETOLS (<u>brian.netols@usdoj.gov</u>)
Special Assistant United States Attorney

219 S. Dearborn, Rm. 500

Chicago, Illinois 60604; (312) 353-4128

JASON A. JULIEN (jason.julien@usdoj.gov)

**Assistant United States Attorney** 

219 S. Dearborn, Rm. 500

Chicago, Illinois 60604; (312) 886-4156

### SUBPOENA ATTACHMENT

Thornton Township Attn: Custodian of Records South Holland, IL 60473 (23 GJ 547)

# PRODUCE CERTIFIED COPIES OF THE FOLLOWING RECORDS IN YOUR POSSESSION, CUSTODY, OR CONTROL:

**CERTIFIED COPIES** of all records in your possession, custody, or control pertaining to the following individuals whether held jointly or severally or as trustee or fiduciary as well as custodian, executor or guardian as well as any other entity in which these individuals may have a financial interest

- Rosie Henyard
- Temika Henyard
- Kamal Woods

#### To include:

- All background records including applications for employment, personnel files, credit checks, or background investigations for the above-named individual and/or entities.
- All employment or payroll records to include records disclosing the dates of employment, wages or commissions paid, direct deposit election forms, ACH authorization forms, checks (front and back) used for any payments to the above-named individual and/or entities.
- Records of time and attendance for the above-named individual and/or entities.
- Disciplinary files for the above-named individual and/or entities.
- Records of work performed, including assignments, positions/title, responsibilities, contract
  modifications, proposals, and dates of employment.
- Wage and Tax Statements (Forms W-2) showing the above-named individual's annual wages.
- Employee's Withholding Allowance Certificates (Forms W-4) and any other exempt status documentation issued to above-named individual and/or entities.
- U.S. Information Returns (Forms 1099 Series) showing fees, commissions, and other payments issued to the above-named individual and/or entities.
- Request for Taxpayer Identification Number (IRS Forms W-9) for the above-named individual and/or entities.

- Records showing the methods of payment for any and all remuneration and/or reimbursement of expenses to include receipts, documentation itemizing expenses, accounting of expenses, ACH authorization forms, and checks (front and back) used for any payments to the above-named individual and/or entities.
- All agreements or contracts with the above-named individual and/or entities.
- Invoices received from the above-named individual and/or entities.
- Description of services provided by the above-named individual and/or entities.
- All retirement and savings plans including pensions, annuities, profit-sharing plans, IRA, simplified employee pension (SEP), savings incentive match plan for employees (SIMPLE), and insurance contracts. Records should show: the employee contributions; balance accumulation; and loans drawn from the accounts (include loan applications, loan terms, repayment records, and records showing the date, amount, and method of repayment, and copies of checks (front and back) or other instruments used to issue or repay loans).

# UNITED STATES DISTRICT COURT for the NORTHERN DISTRICT OF ILLINOIS

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South Holland, IL 60473

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Place:

Everett McKinley Dirksen United States Courthouse, Rm. 1625

219 S. Dearborn

Chicago, Illinois 60604

Grand Jury: SPECIAL NOVEMBER 2023 GRAND JURY 23 GJ 547

Date and Time:

May 20, 2024 9:30 a.m.

You must also bring with you the following documents, electronically stored information, or objects (blank if not applicable):

See Attachment.

Date: April 25, 2024

CLERK OF COURT

Signature of Clerk or Deputy Clerk

/ homas y. Suits

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

BRIAN P. NETOLS (<u>brian.netols@usdoj.gov</u>)
Special Assistant United States Attorney

219 S. Dearborn, Rm. 500

Chicago, Illinois 60604; (312) 353-4128

JASON A. JULIEN (jason.julien@usdoj.gov)

**Assistant United States Attorney** 

219 S. Dearborn, Rm. 500

Chicago, Illinois 60604; (312) 886-4156

### SUBPOENA ATTACHMENT

# Thornton Township Attn: Custodian of Records South Holland, IL 60473 (23 GJ 547)

For time period January 1, 2021 through present, provide the following:

- All municipal code and ordinances applicable during the given time period related to:
  - o Credit card purchases
  - Vendor approvals
  - o Procurement
  - Employment contracts/termination
  - o Per diem
  - o Expense reimbursements
  - o Outside employment, to include any specific regulations for the police department.
  - o Loans issuance
  - o Work schedules/job description
  - o Employee/contractor travel
  - o Security detail
  - o Use of vehicles
  - o Residency requirements for employees/contractors
  - o Donations
- All annual and quarterly financial reports.
- All budgets created for the entity.
- Accounting records for all revenue, expenses, assets, liabilities, and equity related entries
  for the entity. This should include all user data, access, and logs created within any
  accounting software used.
- All applications, payment receipts, contracts and/or agreements related to loans procured on behalf of the entity.

- All records of payment to employees to include payroll, disbursements, reimbursements, direct deposit information.
- All records of outside employment for employees/contractors that are maintained
- Employee handbook
- For all board meetings, please provide the following: (1) meeting agendas, (2) meeting minutes, (3) warrant lists presented, (4) any notes and/or approvals/denials documented relating to the warrant lists, (5) board books.
- All documents related to vehicle purchases and lease, to include but not limited to contracts, payments, approvals, authorized users, and authorized uses for vehicles.

The following requests are specific to identified individuals/entities for the January 1, 2021 through present:

- Any records of municipal resources being used on behalf of (1) a political entity, including but not limited to Friends of Tiffany Henyard, (2) charitable organizations, including but not limited to Tiffany Cares Foundation, Tiffany A Henyard Cares Foundation and/or Tiffany Henyard Cares Foundation.
- All records maintained, controlled or in the possession of the township regarding Tiffany Cares Foundation, Tiffany A Henyard Cares Foundation and/or Tiffany Henyard Cares Foundation. This should include all records related to September 2022 contribution of \$10,000 from Thornton Township.
- All employee/contractor records associated with the following individuals, including but not limited to, hiring/retention, consulting agreements and/or employment contracts, personnel files, work schedules, records of invoices and payments, and job description for:

0	Keith Freeman
0	Keith Freeman, LLC
0	Government Staffing Advisors, LLC
0	Kamal Woods
0	Cheryl Schranz

• All payment disbursements information including but not limited to: expense reimbursements, credit card expenditures, per diems, expense reports, receipts, and electronic communication related to following individuals/entities:

0	Keith	Freeman			
0	Keith	Freeman	LLC		

	o Government Staffing Advisors, LLC			
	o Tiffany Henyard			
	o Fenia Dukes			
	o Carmen Carlisle			
	o Gerald Jones			
	o Stan Brown			
	o Kamal Woods			
	o Cheryl Schranz			
Please provide all records relating to the below listed entities. Such records should income but not be limited to proposals, bids, contracts or other agreements, license and/or per issued, job descriptions, orders payments issued, invoices, and internal/external communications.  o Jose Aldaco				
	o Aldaco Printing, 455 S Center St, Bensenville, IL 60106-2642			
	o On Demand Printing, 455 S Center St, Bensenville, IL 60106-2642			
	o Jose Aldaco Printing & Graphix, 455 S Center St, Bensenville, IL 60106-2642			
	All records relating to Jose Aldaco invoice number 649823697845637330 dated September 28, 2022. This includes order, invoice, communications, disbursement and approvals.			
	Records related to Paul Graver First Government Leasing			
	464 Central Avenue, Northfield, Illinois 60093), including proposals, bids contracts or other agreements, payments issued, invoices, and communications between municipal contractors/employees and First Government Leasing.			
	Contracts, agreements, engagement letters, invoices, description of work, payments relating			

to the following entities:

Jerome Genova

Newsmakers, Inc.

Stryker-Munley Goup

o Del Galdo Law Group LLC

Any other law firms/attorneys paid for by the township

- All records related to approved/unapproved travel paid for by the township. This should
  include official purpose for travel, hotel folios, airfare, per diem requests/approvals, per diem
  disbursements, credit card expenses, expense reports, receipts, expense disbursements, and
  any board of trustee approvals/denials for travel. The response should include, but is not
  limited to the following:
  - o October 4-15, 2022 to Springfield, Illinois
  - o March 2023 to Washington, DC
  - o May 2023 to Las Vegas, Nevada
- Internal and external electronic communications related all requests listed above. These communications should include, but are not limited to the following parties:

0	Tiffany Henyard
0	Keith Freeman
0	Robert Hunt

o Kamal Woods

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Chicago, Illinois 60604

Grand Jury: SPECIAL NOVEMBER 2023 GRAND JURY 23 GJ 547

Date and Time:

May 20, 2024 9:30 a.m.

You must also bring with you the following documents, electronically stored information, or objects (blank if not applicable):

See Attachment

CLERK OF COURT

Signature of Clerk or Deputy Clerk

homas S. Suits

Date: April 24, 2024

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

BRIAN P. NETOLS (<u>brian.netols@usdoj.gov</u>) Special Assistant United States Attorney

219 S. Dearborn, Rm. 500

Chicago, Illinois 60604; (312) 353-4128

JASON A. JULIEN (jason.julien@usdoj.gov)

**Assistant United States Attorney** 

219 S. Dearborn, Rm. 500

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**CERTIFIED COPIES** of all records in your possession, custody, or control pertaining to the following individuals whether held jointly or severally or as trustee or fiduciary as well as custodian, executor or guardian as well as any other entity in which these individuals may have a financial interest:

- Tiffany Henyard
- Good Burgers Inc.
- Aiesha Properties Inc.
- FRIENDS OF TIFFANY HENYARD
- TIFFANY HENYARD CARES FOUNDATION

#### To include:

- All background records including applications for employment, personnel files, credit checks, or background investigations for the above-named individual and/or entities.
- All employment or payroll records to include records disclosing the dates of employment, wages or commissions paid, direct deposit election forms, ACH authorization forms, checks (front and back) used for any payments to the above-named individual and/or entities.
- All retirement and savings plans including pensions, annuities, profit-sharing plans, IRA, simplified employee pension (SEP), savings incentive match plan for employees (SIMPLE), and insurance contracts. Records should show: the employee contributions; balance accumulation; and loans drawn from the accounts (include loan applications, loan terms, repayment records, and records showing the date, amount, and method of repayment, and copies of checks (front and back) or other instruments used to issue or repay loans).
- Records of time and attendance for the above-named individual and/or entities.
- Disciplinary files for the above-named individual and/or entities.
- Records of work performed, including assignments, positions/title, responsibilities, contract
  modifications, proposals, and dates of employment.
- Wage and Tax Statements (Forms W-2) showing the above-named individual's annual wages.
- Employee's Withholding Allowance Certificates (Forms W-4) and any other exempt status documentation issued to above-named individual and/or entities.

- U.S. Information Returns (Forms 1099 Series) showing fees, commissions, and other payments issued to the above-named individual and/or entities.
- Request for Taxpayer Identification Number (IRS Forms W-9) for the above-named individual and/or entities.
- Records showing the methods of payment for any and all remuneration and/or reimbursement of expenses to include receipts, documentation itemizing expenses, accounting of expenses, ACH authorization forms, and checks (front and back) used for any payments to the above-named individual and/or entities.
- All agreements or contracts with the above-named individual and/or entities.
- Invoices received from the above-named individual and/or entities.
- Description of services provided by the above-named individual and/or entities.
- Receipts received for payments made to the above listed individuals and/or entities.
- Records documenting payments made to the above-named individuals and/or entities, including bank statements, checks copies (front and back), cashier's checks, Money Orders, wire transfers, Automated Clearing House (ACH), or other negotiable instruments.
- Checks written to "Cash" or written with the "Pay to the Order Of" (payee) line blank and provided to the above-named individuals and/or entities.