

STATE OF ILLINOIS

UNITED STATES OF AMERICA

IN THE NAME OF THE PEOPLE OF THE STATE OF ILLINOIS COUNTY OF DU PAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

CO APPROVAL

IN THE MATTER OF A
GRAND JURY INVESTIGATION

Case Number
Thursday 2/5/2015

The People of the State of Illinois, to All Sheriffs of the State of Illinois, to All Coroners of the State of Illinois, GREETINGS
We command You to Summon **College of DuPage**
Glen Ellyn, IL 60137

if found, personally to be and appear before the GRAND JURY OF DU PAGE COUNTY, ILLINOIS, in session in Room 4016, 505 North County Farm Road, the City of Wheaton, DuPage County, Illinois on

Thursday February 19, 2015 9:30 At M.
and produce at the time and place aforesaid and to bring, to be used as evidence, certain instruments of writing and purporting to be

Copies of all Employment Agreements, contracts, extensions, and addendums pertaining to the employment of Robert L. Breuder from 2008 to the present. Copies of College of DuPage Board of Trustees meeting minutes pertaining to the approval of employment of Robert L. Breuder and any addendums and extensions pertaining to that employment. The number and issuer of all credit cards issued for Breuder's use. All Rules and Regulations, policies, and direction regarding the use and purpose of use of the credit cards by Breuder.

Pursuant to an official criminal investigation being conducted by this agency, you are not to disclose the existence of this request. Any such disclosure could impede the investigation being conducted and subject you to criminal charges.

SUBPOENA MAY BE COMPLIED WITH BY SUBMITTING SAID RECORDS TO THE ATTENTION OF : DUPAGE COUNTY GRAND JURY MATERIALS SUBPOENA # 18154 DuPage COUNTY STATE'S ATTORNEY'S OFFICE 503 N. COUNTY FARM ROAD, WHEATON, ILLINOIS 60187, PRIOR TO THE GRAND JURY COURT DATE OR BY PERSONALLY PRESENTING SAID RECORDS TO THE GRAND JURY ON THE DATE AND TIME LISTED ABOVE.

then, and there to testify in a matter now pending before the GRAND JURY concerning those things of which you may have knowledge and the import of such instruments of writing, and this you shall not omit.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT.

WITNESS: CHRIS KACHIROUBAS, Clerk of the Eighteenth Judicial Circuit Court, and the seal thereof, Wheaton, Illinois



February 4, 2015

Date

Chris Kachroubas

Clerk of the Eighteenth Judicial Circuit

NOTICE TO WITNESS
Any questions regarding your knowledge of the subject matter or testimony in the case should be directed to the States Attorney or your attorney.

DuPage Attorney No. 50000
State's Attorney of DuPage County
503 North County Farm Road
Wheaton, Illinois 60187
(630) 407-8000

Control No. 18154

All Assistant State's Attorney's personnel and staff.
Vega, Tatarelis, Kulkarni, Michalak/Inv. Norman Hall-SAO 14-034

I served this subpoena by delivering a copy to _____

and I paid the witness \$ _____ for witness and mileage fees.

Signature of Party

Signed and sworn to before me

Date

Circuit Clerk or Notary Public

AFTER SERVICE, THE ORIGINAL (WHITE) MUST BE FILED WITH THE CIRCUIT COURT CLERK ALONG WITH THE ENDORSEMENT OF SERVICE

RECORD CERTIFICATION

1. I, _____, am a duly authorized custodian of records of _____ with authority to execute this affidavit and certify to the authenticity and accuracy of the records produced with this affidavit pertaining to Subpoena Duces Tecum Control No. _____.
2. I hereby certify that the documents submitted herewith are the original records or duplicates of original records in our possession and control that are specified in the aforementioned Subpoena Duces Tecum.
3. The records attached to the response to the Subpoena Duces Tecum were made and kept in the course of regularly conducted business activity, and it was the regular practice of this company's regularly conducted business activity to make such records.
4. The records were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me
This ____ day of _____, 2014.

Notary Public

RECORD CERTIFICATION

1. I, _____, am a duly authorized custodian of records of _____ with authority to execute this affidavit and certify to the authenticity and accuracy of the records produced with this affidavit pertaining to Subpoena Duces Tecum Control No. _____.

2. A thorough and diligent search of our files was made and I find there are no records pertaining to aforementioned Subpoena Duces Tecum.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me
This ____ day of _____, 2014.

Notary Public

STATE OF ILLINOIS

UNITED STATES OF AMERICA
IN THE NAME OF THE PEOPLE OF THE STATE OF ILLINOIS COUNTY OF DUPAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

GRAND JURY APPROVAL
Thursday 2/5/2015

IN THE MATTER OF A
GRAND JURY INVESTIGATION

Case No. _____

The People of the State of Illinois, to All Sheriffs of the State of Illinois, to All Coroners of the State of Illinois, GREETINGS
We command You to Summon **College of DuPage**
Glen Ellyn, IL 60137

if found, personally to ~~appear~~ **PLEASE PROVIDE YOUR BUSINESS CARD TO A VILLINOIS**, in session in
Room 4016, 505 North County Farm Road, the City of Wheaton, DuPage County, Illinois on

Thursday February 19, 2015 9:30 A. at _____ M.
and produce at the time and place aforesaid and to bring, to be used as evidence, certain instruments of writing and
purporting to be

Copies of all Employment Agreements, contracts, extensions, and addendums pertaining to the
employment of Carla Burkhart, DBA/ Hericane Graphics, West Chicago, IL, as architect and/or design
consultant and/or other capacity for the College of DuPage from date of hire to the present, including but
not limited to Board of Trustees meeting minutes approving the employment, duties, job description, and
responsibilities of the Design Consultant or other capacity, copies of any licensing documents provided to
the College of DuPage evidencing Burkhart and/or Hericane Graphics current licensure as design firm
and/or architect, and copies of any invoices and method of payment including copy of check (front and
back), complete wire transfer paperwork, and/or ACH transfer paperwork, for the Signage Design
Contract awarded to Hericane Graphics/ Carla Burkhart on or about April 19, 2012.

Pursuant to an official criminal investigation being conducted by this agency, you are not to disclose the
existence of this request. Any such disclosure could impede the investigation being conducted and
subject you to criminal charges.

SUBPOENA MAY BE COMPLIED WITH BY SUBMITTING SAID RECORDS TO THE ATTENTION OF: DUPAGE COUNTY GRAND JURY MATERIALS
SUBPOENA # 18175 DUPAGE COUNTY STATE'S ATTORNEY'S OFFICE, 505 N. COUNTY FARM ROAD, WHEATON, ILLINOIS 60187, PRIOR TO
THEIR ASSIGNED COURT DATE. ANY PERSONS WHOSE RECORDS ARE REQUESTED SHOULD NOTIFY THE SHARPCOURT ON THE DATE AND TIME LISTED
ABOVE.

YOUR FAILURE TO APPEAR IN RESPONSE
TO THIS SUBPOENA WILL SUBJECT YOU
TO PUNISHMENT FOR CONTEMPT OF
COURT.

WITNESS: CHRIS KACHIROUBAS, Clerk of the Eighteenth
Judicial Circuit Court, and the seal thereof, Wheaton,
Illinois



February 4, 2015
Date

Chris Kachroubas
Clerk of the Eighteenth Judicial Circuit

NOTICE TO WITNESS
Any questions regarding your knowledge of the
subject matter or testimony in the case should be
directed to the State's Attorney or your attorney.

DuPage Attorney No. 50000
State's Attorney of DuPage County
503 North County Farm Road
Wheaton, Illinois 60187
(630) 407-8000

Control No. **18175**

All Assistant State's Attorney's personnel and staff.
Vega, Tarelis, Kulkarni, Michalak/ Inv. Norman Hall-SAO 14-034

RECORD CERTIFICATION

1. I, _____, am a duly authorized custodian of records of _____ with authority to execute this affidavit and certify to the authenticity and accuracy of the records produced with this affidavit pertaining to Subpoena Duces Tecum Control No. _____.
2. I hereby certify that the documents submitted herewith are the original records or duplicates of original records in our possession and control that are specified in the aforementioned Subpoena Duces Tecum.
3. The records attached to the response to the Subpoena Duces Tecum were made and kept in the course of regularly conducted business activity, and it was the regular practice of this company's regularly conducted business activity to make such records.
4. The records were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me
This ____ day of _____, 2014.

Notary Public

RECORD CERTIFICATION

1. I, _____, am a duly authorized custodian of records of _____ with authority to execute this affidavit and certify to the authenticity and accuracy of the records produced with this affidavit pertaining to Subpoena Duces Tecum Control No. _____.
2. A thorough and diligent search of our files was made and I find there are no records pertaining to aforementioned Subpoena Duces Tecum.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Subscribed and sworn to before me
This _____ day of _____, 2014.

Notary Public

STATE OF ILLINOIS

UNITED STATES OF AMERICA
IN THE NAME OF THE PEOPLE OF THE STATE OF ILLINOIS COUNTY OF DU PAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

CL APPROVAL
Thursday 3/19/2015

IN THE MATTER OF A
GRAND JURY INVESTIGATION

The People of the State of Illinois, to All Sheriffs of the State of Illinois, to All Coroners of the State of Illinois, GREETINGS

We command You to Summon **College of DuPage**
Glen Ellyn, IL 60137

PLEASE PROVIDE YOUR BUSINESS AFFIDAVIT

if found, personally to be and appear before the GRAND JURY OF DU PAGE COUNTY, ILLINOIS, in session in Room 4016, 505 North County Farm Road, the City of Wheaton, DuPage County, Illinois on

Thursday April 9, 2015, 9:30 A. at M.

and produce at the time and place aforesaid and to bring, to be used as evidence, certain instruments of writing and purporting to be

SEE EXHIBIT A

Pursuant to an official criminal investigation being conducted by this agency, you are not to disclose the existence of this request. Any such disclosure could impede the investigation being conducted and subject you to criminal charges.

SUBPOENA MAY BE COMPLIED WITH BY SUBMITTING SAID RECORDS TO THE ATTENTION OF : DUPAGE COUNTY GRAND JURY MATERIALS SUBPOENA #. 18404 DuPage COUNTY STATE'S ATTORNEY'S OFFICE 503 N. COUNTY FARM ROAD, WHEATON, ILLINOIS 60187, PRIOR TO THE GRAND JURY COURT DATE OR BY PERSONALLY PRESENTING SAID RECORDS TO THE GRAND JURY ON THE DATE AND TIME LISTED ABOVE.

then, and there to testify in a matter now pending before the GRAND JURY concerning those things of which you may have knowledge and the import of such instruments of writing, and this you shall not omit.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF COURT.

WITNESS: **CHRIS KACHIROUBAS**, Clerk of the Eighteenth Judicial Circuit Court, and the seal thereof, Wheaton, Illinois



March 17, 2015

Date

Chris Kachroubas

Clerk of the Eighteenth Judicial Circuit

NOTICE TO WITNESS

Any questions regarding your knowledge of the subject matter or testimony in the case should be directed to the States Attorney or your attorney.

DuPage Attorney No. 50000
State's Attorney of DuPage County
503 North County Farm Road
Wheaton, Illinois 60187

Control No. **18404**

Add. contact State's Attorney's personnel and staff.
Vega, Tatarelis, Kulkarni, Michalak/ Inv. Norman Hall-14-034

SFA

Exhibit A

The following documents for all credit card accounts issued to the College of DuPage that are used by Robert Breuder, and/or issued to Robert Breuder, that are paid for by the College of DuPage, and/or College of DuPage Foundation and/or bearing account numbers 4798-5100-4198-9415 and 4798-5100-4887-6813, for the period of the date that these accounts were opened through the present, including but not limited to:

1. Copies of any and all supporting documents to show the purpose of purchases made with the credit cards, Reimbursable Expense forms, receipts, and other proof of purchases made and the purposes of such purchases.
 2. Copies of any payments made by Robert Breuder to the College of DuPage pertaining to purchases made on those credit cards.
-
3. Any correspondence between the College of DuPage and Robert Breuder concerning these credit cards.
 4. Any College of DuPage rules and regulations concerning expense reports.
 5. Robert Breuder's travel and local appointment schedule for the time period of January 1, 2009 through the present.

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF ILLINOIS

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: College of DuPage
425 Fawell Boulevard
Glen Ellyn, IL 60137

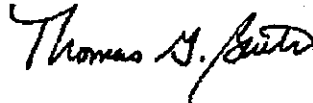
YOU ARE COMMANDED to appear in this United States District Court at the time, date, and place shown below to testify before the Court's Grand Jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: Dirksen Federal Building, Rm. 1625 219 S. Dearborn Chicago, Illinois 60604 Grand Jury: SPECIAL JANUARY 2015 GRAND JURY 15 GJ 205	Date and Time: April 23, 2015 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.

CLERK OF COURT



Signature of Clerk or Deputy Clerk

Date: April 13, 2015

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

ERIKA CSICSILA (erika.csicsila@usdoj.gov)
Assistant United States Attorney
219 S. Dearborn, Rm. 500
Chicago, Illinois 60604; (312) 353-5370



U.S. Department of Justice

United States Attorney
Northern District of Illinois

ERIKA CSICSILA
Assistant United States Attorney

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

Direct Line: (312) 853-5370
Fax: (312) 886-2790
erika.csicsila@usdoj.gov

April 13, 2015

College of DuPage
425 Fawell Boulevard
Glen Ellyn, IL 60137

Re: Subpoena Duces Tecum – 15 GJ 205

Dear Sir or Madam:

The accompanying federal grand jury subpoena seeks records pursuant to an official criminal investigation. We ask that you do not disclose, directly or indirectly, the fact that you have received this subpoena or your compliance with it. Although you are not required to comply with this request, disclosure may interfere with the investigation.

In lieu of a personal appearance before the grand jury, you may supply the records requested in the accompanying subpoena prior to the specified date, and direct any questions you may have, to: **Special Agent Matt Blankenship, Federal Bureau of Investigation, 4343 Commerce Street, Suite 600, Lisle, Illinois 60532.** Please contact him at (630) 505-5755 to make arrangements to produce the requested information when you receive this letter and the enclosed subpoena.

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.

Very truly yours,

ZACHARY T. FARDON
United States Attorney

By: s/ Erika Csicsila
ERIKA CSICSILA
Assistant United States Attorney

Enclosures

SUBPOENA ATTACHMENT

**College of DuPage
Glen Ellyn, IL 60137
(15 GJ 205)**

The following documents, from January 1, 2009 until present:

1. All documents pertaining to open or closed bank accounts, credit card accounts, and/or ATM Debit card accounts, including imprest, operating, "house," foundation or other accounts, used in connection with charges incurred by or payments made to the COD president, trustees, senior management personnel, COD Foundation members, and/or entities in which COD Foundation members are professionally associated, including but not limited to:
 - a) Signature cards
 - b) Statements, cancelled checks, deposit tickets, wire transfers, credit and debit memos
 - c) Documents reflecting payment on the account

2. All personnel records for the COD president, trustees, and all senior management personnel, including but not limited to:
 - a) W- 2 forms
 - b) Personal identification information, such as address, phone numbers, birthdate and social security numbers
 - c) Job descriptions, training records, documents reflecting certificates and degrees, résumés
 - d) Expense reports and/or related documentation
 - e) Conflict of interest statements

3. All records relating to services provided by, contracts with, or bids involving COD Foundation members and/or entities in which COD Foundation members are professionally associated, including but not limited to:
 - a) Bid documentation, regardless of success of bid, including advertisements, bid solicitation, specifications, revisions, supplements, amendments, qualifications and professional certifications of bidder, approvals, and notifications
 - b) Contracts, agreements, invoices, ledgers, accounting records, and other documents relating to work proposed or performed in connection with such contracts/agreements
 - c) Documents relating to the disclosure of conflicts of interest
 - d) Board Meeting minutes or other meeting minutes or documentation reflecting discussions or voting on the bids, contracts, or services provided
 - e) Documents relating to project schedules, such as cost estimates/accounting, delivery schedules, payment schedules, method of payment, evaluation and performance factors, quality assurance inspection, certificates, memorandum, forms
 - f) Documents reflecting loans or payments between the COD and COD Foundation members and/or entities in which the COD foundation member is professionally associated.

4. **Emails sent or received by the COD president, trustees, and senior management personnel.**
5. Records reflecting payments made to the COD president, trustees, senior management personnel, COD foundation members, and/or entities in which the COD foundation members are professionally associated, including compensation and reimbursements records.
6. Any and all meeting minutes and recordings involving the COD president, board of trustees members, and/or all senior management personnel, including public and executive session meetings.
7. Calendars of the COD president, trustees, and senior management personnel.

**DECLARATION CERTIFYING RECORDS OF
REGULARLY CONDUCTED ACTIVITY**

I, _____, am employed by

(name)

(name of entity)

My official title is _____ . As part of my duties as a

(title)

_____, I am familiar with the records that _____

(title)

(name of entity)

keeps in the ordinary course of business. I am familiar with the types of documents received, created and relied upon by _____ in the ordinary course of its business.

(name of entity)

I certify that I have reviewed the records attached hereto and that these records are the original or duplicates of the original records kept in the custody of _____ :

(name of entity)

List documents

I further certify that:

- A) such records were made, at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- B) such records were kept in the course of a regularly conducted business activity;
- C) the business activity made such records as a regular practice;
- D) if such record is not the original, such record is a duplicate of the original.

I certify under penalty of perjury that the foregoing is true and correct.

Signature

Executed on this ___ day of _____, _____

(day)

(month)

(year)

at _____, _____

(city)

(state)

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF ILLINOIS

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: College of DuPage
Suburban Law Enforcement Academy
425 Fawell Blvd.
Glen Ellyn, IL 60137
Attn: Custodian of Records

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.

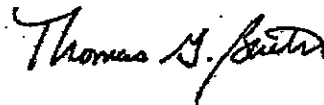
Place: Dirksen Federal Building, Rm. 1625 219 S. Dearborn Chicago, Illinois 60604 Grand Jury: SPECIAL JANUARY 2015 GRAND JURY 15 GJ 205	Date and Time: April 30, 2015 9:30 a.m.
--	--

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

See Attachment

Date: April 13, 2015

CLERK OF COURT



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:

ERIKA L. CSICSILA (erika.csicsila@usdoj.gov)
Assistant United States Attorney
219 S. Dearborn, Rm. 500
Chicago, Illinois 60604
(312) 353-5370

College of DuPage
Suburban Law Enforcement Academy
425 Fawell Blvd.
Glen Ellyn, IL 60137
Attn: Custodian of Records

SUBPOENA ATTACHMENT

The following documents relating to College of DuPage (COD) and Suburban Law Enforcement Academy (SLEA), from January 1, 2010 to the present:

- 1) **Basic Law Enforcement Academy records:**
 - a. Class Rosters, syllabi, files, academic records
 - b. Database records to include "My Access"
 - c. Instructor grade certifications
 - d. Personnel file for certifying instructor(s)
 - e. Official COD academic and grade transcripts for recruits

- 2) **Continuing Education Academy records:**
 - a. Class Rosters, syllabi, files, academic records
 - b. Database records to include "My Access"
 - c. Instructor grade certifications
 - d. Personnel file for certifying instructor(s)
 - e. Official COD academic and grade transcripts for recruits

- 3) **All electronic mail sent or received by former Director of Continuing Education Jim Kempinski, former Program Manager Dan Maloney, SLEA Director Michael Casey, Associate Dean Marianne Hunnicutt, Dean of Continuing Education Joseph Cassidy, Director of Homeland Security Institute Thomas Brady.**



U.S. Department of Justice

*United States Attorney
Northern District of Illinois*

ERIKA L. CSICSILA
Assistant United States Attorney

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

Direct Line: (312)353-5370
Fax: (312)886-0657
E-mail: erika.csicsila@usdoj.gov

April 13, 2015

College of DuPage
Suburban Law Enforcement Academy
425 Fawell Blvd.
Glen Ellyn, IL 60137
Attn: Custodian of Records

Re: Subpoena Duces Tecum - 15 GJ 205

Dear Custodian of Records:

The accompanying federal grand jury subpoena seeks records pursuant to an official criminal investigation. We ask that you do not disclose, directly or indirectly, the fact that you have received this subpoena or your response to it. Although you are not required to comply with this request, disclosure may interfere with the 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 Special Agent Matt C. Blankenship, Federal Bureau of Investigation, 4343 Commerce Ct., Ste 600, Lisle, IL 60532. Special Agent Blankenship may be reached at (630) 577-3466.

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) 353-5370. Thank you for your assistance.

Very truly yours,

ZACHARY T. FARDON
United States Attorney

By: s/Erika L. Csicsila
ERIKA L. CSICSILA
Assistant United States Attorney

**DECLARATION CERTIFYING RECORDS OF
REGULARLY CONDUCTED ACTIVITY.**

I, _____, am employed by

(name)

(name of entity)

My official title is _____ . As part of my duties as a

(title)

_____, I am familiar with the records that _____,

(title)

(name of entity)

keeps in the ordinary course of business. I am familiar with the types of documents received, created and relied upon by _____ in the ordinary course of its

(name of entity)

business.

I certify that I have reviewed the records attached hereto and that these records are the original or duplicates of the original records kept in the custody of _____:

(name of entity)

List documents

I further certify that:

- A) such records were made, at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- B) such records were kept in the course of a regularly conducted business activity;
- C) the business activity made such records as a regular practice;
- D) if such record is not the original, such record is a duplicate of the original.

I certify under penalty of perjury that the foregoing is true and correct.

Signature

Executed on this ___ day of _____, _____
(day) (month) (year)

at _____, _____
(city) (state)