

# EXHIBIT A

McGuireWoods LLP  
2001 K Street N.W.  
Suite 400  
Washington, D.C. 20006-1040  
Tel 202.857.1700  
Fax 202.857.1737  
www.mcguirewoods.com

Nicholas B. Lewis  
Direct: 202.857.1771

McGUIREWOODS

nlewis@mcguirewoods.com  
Fax: 202.828.3306

August 25, 2015

*Confidential Communication Relating to  
an Ongoing Grand Jury Investigation;  
Confidential Treatment Requested*

**SENT BY OVERNIGHT DELIVERY**

Timothy A. Bass, Esq.  
Assistant U.S. Attorney  
U.S. Attorney's Office, Central District of Illinois  
318 S. 6th Street  
Springfield, IL 62701

Re: Grand Jury Subpoena to Aaron Schock (0714-GJS-002330)  
Document Production No. 4

Dear AUSA Bass:

On behalf of Aaron Schock, please find enclosed a disk containing records that are responsive to the Grand Jury Subpoena ("GJS") referenced above. With respect to GJS Request number 1, the Court confirmed in its Sealed Opinion of April 9, 2015, and reiterated in its Sealed Opinion of June 25, 2015, that the request is "clearly limited to financial records from specifically identified persons (Mr. Schock) and entities." April 9 Order at 9 & June 25 Opinion at 5.

The documents are Bates-numbered MW-DOJ-00011255 – MW-DOJ-00021759. The disk is password protected. We will send the password to you by separate correspondence. Please contact us immediately if you do not receive the password or any of the documents identified above.

These documents are produced in accordance with and are subject to the use immunity agreement ("Agreement") dated July 10, 2015, and executed July 13, 2015, between Mr. Schock and your Office. Other than as set forth in that Agreement, this letter and our production of the enclosed disk are not intended to waive and do not constitute a waiver of any privileges or rights. Certain documents have been redacted or withheld based on the attorney-client privilege and the work product doctrine. We have included with this production a privilege log identifying these documents and the applicable privilege.

August 25, 2015

Page 2

This production completes Mr. Schock's production of records possessed by him personally that are responsive to the GJS, including responsive campaign and political committee records that were in his personal possession. Accordingly, with this production, Mr. Schock has met his obligations under the agreement reached with you at the show cause hearing on July 29, 2015, which agreement was filed with the Court on July 31, 2015.

Additionally, Mr. Schock is simultaneously offering to provide to the Court for *in camera, ex parte* review certain documents related to Request number 1 that we have determined are not responsive to the GJS as they are not "financial records" as set forth by the Court (and are not otherwise responsive to Requests numbers 2 and 3), but which may contain references to financial transactions. We offer to provide these to the Court for its consideration out of an abundance of caution in order to ensure that our production is consistent with the Court's orders and the scope of the Court's determination of the terms for production in response to the ambiguity created by the language and breadth of the GJS. Should the Court determine that these documents should be produced, we will immediately produce them to you.

All enclosed documents produced herewith are submitted in response to a grand jury subpoena and are subject to Federal Rule of Criminal Procedure 6(e) and any other applicable rules and laws. Pursuant to the Freedom of Information Act, 5 U.S.C. §552(b)(4) ("FOIA"), and the U.S. Department of Justice's stated policy (*see* 28 CFR §16.8), Mr. Schock requests that all these documents be treated as confidential and exempt from disclosure to third parties. Mr. Schock further requests that confidential treatment be accorded to this letter and any notes, memoranda, or other records created by or at the direction of the U.S. Department of Justice or its officers or staff members, that reflect, refer, or relate to these documents.

Please promptly inform me, at the address and phone number listed above, (1) if you do not receive any of the listed documents, and (2) of any FOIA or other request seeking access to the documents, or any of the above-mentioned records, including this letter, to enable us to substantiate the grounds for confidential treatment, unless the U.S. Department of Justice intends to deny such request for access.

Sincerely,



Nicholas B. Lewis

*Counsel for Aaron Schock*

Enclosures

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**From:** Shearer, Steven <Steven.Shearer@mail.house.gov>  
**Sent:** Wednesday, April 13, 2011 8:29 PM  
**To:** 'aaronschock@aol.com'; Etchart, Jeannie  
**Subject:** FW: reception  
**Attachments:** Shadid - Invite - 2.pdf

---

**From:** [James Shadid@ilcd.uscourts.gov](mailto:James_Shadid@ilcd.uscourts.gov) [mailto:[James Shadid@ilcd.uscourts.gov](mailto:James_Shadid@ilcd.uscourts.gov)]  
**Sent:** Wednesday, April 13, 2011 11:41 AM  
**To:** [aaronschock@gmail.com](mailto:aaronschock@gmail.com)  
**Cc:** Shearer, Steven  
**Subject:** reception

Aaron

I realize this is short notice but am enclosing an invitation to my investiture on the 27th. You will also receive one in the mail. I assume you are attending the airport grand opening at 10:30 that morning and might be in town.

My ceremony will only last 45 minutes followed by a brief reception. I expect we will have 150 -200 people. If you can attend that would be great. If not I understand. I have invited Sen. Kirk as well. I have indicated to Sen. Kirk that if he is able to stay for a few moments after the program I would introduce him to say a few words at the reception.

Hope all is well. Thank you for taking time to meet with us last week.

Jim

PS Steve, sorry I couldn't pull McCuskey off of you sooner when he cornered you about the courts and the shutdown and all the blah, blah, blah.

Jim



*You are cordially invited to attend  
the investiture of the  
Honorable James E. Shadid  
as United States District Court Judge  
on Wednesday, April Twenty-Seven,  
Two Thousand and Eleven  
at Nine O'Clock in the morning  
at  
The United States District Courthouse  
Second Floor Courtroom A  
100 N.E. Monroe Street  
Peoria, Illinois*

*Reception immediately following ceremony*

*Due to limited seating, we request the favor of a reply  
by April 25, 2011 to Cathy Geier (309) 671-4227  
or email [Investiture.Shadid@ilcd.uscourts.gov](mailto:Investiture.Shadid@ilcd.uscourts.gov)*

*For security purposes, doors will open at 8:00 am*

# **EXHIBIT B**

**03/30/15 - LUNCH: Aaron Schock (SCHOCK), Confidential Source (CS),  
Unknown Male (UM)**

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110 CS: Hmm.

111 SCHOCK: He's like, are, he says, they always been talking to you about like that? And I go,  
112 yeah! I said every time I meet with them, they're like, "how come you didn't tell  
113 us about this!" Or "how come you didn't tell us about that!"

114 CS: Hmm.

115 SCHOCK: But you're going through six years of emails.

116 CS: Okay.

117 SCHOCK: Right, so anytime they find some stupid email where Steve Scheer hauls off and,  
118 you know, and does his normal tirade...

119 CS: Right.

120 SCHOCK: ...of like, you know, (makes noise)...

121 CS: Oh, I've seen those. (Chuckles)

122 SCHOCK: I'm like, I'm like, you don't understand. I'm like, he is a lunatic.

123 CS: Mm hmm.

124 SCHOCK: I'm like anybody who works for me will verify that he's a lunatic and he will go  
125 postal on anyone, any time of the day! He will go postal on Tonya then he'll do it  
126 on Karen then he'll do it on Carol then he'll do it on Mark, I'm like, this is no like  
127 special love for me. I said, this is the guy's behavior, you know?

128 CS: Right, right.

129 SCHOCK: "Well, these are very troublesome" blah, blah, blah. And I go, okay, well, but  
130 then my, the new guy looks at 'em and goes, "okay, but DOJ's not gonna have his  
131 emails." I'm like, that's not what they're after.

# EXHIBIT C



KERRY W. KIRCHER  
GENERAL COUNSEL

WILLIAM PITTARD  
DEPUTY GENERAL COUNSEL

U.S. HOUSE OF REPRESENTATIVES  
OFFICE OF GENERAL COUNSEL  
219 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-6532  
(202) 225-9700  
FAX: (202) 226-1360

TODD B. TATELMAN  
SENIOR ASSISTANT COUNSEL

ELENI M. ROUMEL  
ASSISTANT COUNSEL

ISAAC B. ROSENBERG  
ASSISTANT COUNSEL

KIMBERLY HAMM  
ASSISTANT COUNSEL

SARAH E. CLOUSE  
STAFF ATTORNEY

May 18, 2015

**BY ELECTRONIC MAIL ONLY ([GTerwilliger@mcguirewoods.com](mailto:GTerwilliger@mcguirewoods.com))**

George J. Terwilliger III, Esq.  
McGuireWoods LLP  
2001 K Street, N.W.  
Suite 400  
Washington, D.C. 20006-1040

**Re: Former Congressman Aaron Schock**

Dear George:

Thank you for your letters of May 1 and 6, 2015, and Mr. Bittman's May 7, 2015 email. Those letters and that email raise several issues which I will address in turn.

1. "Authorization." Insofar as former Congressman Schock purports to "authorize[] the Clerk of the House . . . to produce any of his official records responsive to the grand jury subpoena [issued to him] (and which are not privileged) to the government in full compliance with the said grand jury subpoena," Letter from George J. Terwilliger III, Esq., to Kerry W. Kircher, General Counsel at 1 (May 6, 2015), the Clerk rejects any implication (i) that the former Congressman may outsource to her his responsibility to comply with his grand jury subpoena, or (ii) that she is bound by any such purported "authorization." As you know, I so advised you when I met with you and Assistant United States Attorney Timothy Bass on April 22, 2015.

2. Personal Effects. The Clerk is compiling an inventory of tangible personal property (furniture, artwork, decorative objects, books, awards, framed photos, and the like) which former Congressman Schock left behind in his Washington, D.C. congressional office, and/or his district offices, when he departed the House on March 31, 2015. The Clerk will include on the inventory all items which cannot definitively be determined to have been paid for with Members Representational Allowance ("MRA") funds. Once that list is complete, we will share it with you so that Mr. Schock can determine whether the list (i) includes any items he believes were purchased with MRA funds; (ii) does not include items he believes were purchased with personal funds; and (iii) includes items as to which he wishes to disavow any ownership interest.

Once the list is finalized, with Mr. Schock's input, it will be his responsibility to retrieve his personal effects – or arrange for them to be shipped – from the House (and from the district office(s) to the extent any of his personal effects are located there).

3. Congressional Records. As you know, Mr. Schock owns the congressional records he left behind in his four congressional offices – Washington, D.C.; Peoria, IL; Springfield, IL;

George J. Terwilliger III, Esq.  
May 18, 2015  
Page 2

Jacksonville, IL – when he departed the House on March 31, 2015. Inasmuch as he has declined to disavow his ownership interest in his congressional records, the Clerk has determined to handle those records as follows:

(a) Paper Records in the Washington, D.C. Congressional Office. Two of my colleagues and I, on behalf of the Clerk, have reviewed all of the paper records in the Washington, D.C. congressional office.<sup>1</sup> We have identified and boxed all paper records that we concluded are outside the scope of the March 20, 2015 preservation letter which the Department of Justice directed to me (“Preservation Request”). These paper records (57 boxes, each of which measures 10x12x15) will be delivered to you, as counsel for Mr. Schock, and it will be his responsibility to see to their retention and/or disposition. The Clerk will *not* retain copies of this collection of paper records – a detailed inventory of which is being compiled and which will be provided to you when completed – because they are outside the scope of the Preservation Request.<sup>2</sup>

The remaining paper records in the Washington, D.C. congressional office, which arguably are encompassed by the Preservation Request, will be copied and bates-numbered. Those bates-numbered copies, in electronic format, also will be delivered to you as counsel for Mr. Schock. The Clerk will retain the originals of this collection of paper records.

(b) Paper Records in the Three District Offices. With one exception noted immediately below, the Clerk will handle the paper records in the three district offices in a similar fashion in the weeks ahead. When the time comes, we will talk with you about how to deliver paper records that are outside the scope of the Preservation Request to you, or to Illinois counsel for Mr. Schock, in a manner that is cost effective for the House.

The one exception is the district offices’ substantial collection of closed constituent case files which are outside the scope of the Preservation Request. Because of the nature of these files (particularly the fact that they may contain sensitive personal information about constituents), Members typically dispose of such records when they leave office. Accordingly, please advise me no later than close of business on May 22, 2015, whether Mr. Schock wishes to retain closed constituent case files. If yes, they will be returned to you, or to Illinois counsel for Mr. Schock, in a manner that is cost effective for the House. If no, the Clerk will dispose of them.

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<sup>1</sup> We did not review records the former Congressman may have stored with the National Archives and Records Administration. If there are any such records, the Clerk does not regard them as within her custody or control, as I previously advised you.

<sup>2</sup> In the course of our review, we also identified and segregated four boxes of paper records that pre-date January 2009 (when Mr. Schock first was sworn in as a Member of the House), and that concern the congressional service of Ray LaHood, Mr. Schock’s predecessor. The Clerk will return those records to former Congressman LaHood.

George J. Terwilliger III, Esq.  
May 18, 2015  
Page 3

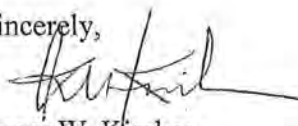
(c) Electronic Records. I understand that former Congressman Schock's Jones Day attorneys – with the assistance of House IT personnel (as to data controlled by the Chief Administrative Officer of the House), and with the assistance of a private vendor (as to data on the work stations and laptops in the various congressional offices, and on electronic devices used by the former Congressman and his staff) – obtained, prior to his departure from the House on March 31, 2015, copies of a substantial volume of electronic data that belongs to the former Congressman.

Notwithstanding, and in the interest of ensuring that Mr. Schock has copies of all his electronic data, the Clerk has requested that House IT personnel image the hard drives of all workstations, laptops, and other electronic devices in all four congressional offices. Those images, with appropriate identifiers included, also will be delivered to you, or to Illinois counsel for Mr. Schock, as appropriate. The Clerk will retain control of the actual workstations, laptops, and other electronic devices, some of which will continue to be used by staff while they are working for the Office of the 18th Congressional District of Illinois.<sup>3</sup>

4. Mr. Bittman's email seeks information well beyond what you and I discussed in our phone conversation on May 6 or 7, 2015. (You will recall that I said only that I might be willing to obtain for you the number of emails on the workstations of one or two key staffers if that information would be helpful to you in your dealings with the Court.) Moreover, as discussed above, I now understand that you already have a substantial volume of electronic data that belongs to former Congressman Schock from which you should be able to derive most (if not all) of the information you seek. In addition, you should be able to derive all of the information of interest to you from the hard drives images the Clerk will deliver to you in the coming days and weeks.

Thank you for your attention.

Sincerely,



Kerry W. Kircher

cc: The Honorable Karen L. Haas  
Timothy A. Bass, Assistant U.S. Attorney

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<sup>3</sup> The Office of the 18th Congressional District of Illinois will cease to exist on September 10, 2015, the date of the Illinois-18 special election. Accordingly, shortly before the election, the Clerk will have the hard drives from all the Office's workstations and laptops removed and replaced with new hard drives to enable the newly elected Member to use those workstations and laptops. The Clerk will retain custody of the removed hard drives, as well as the Office's other electronic devices as they are relinquished by the staff of the Office.

# EXHIBIT D

KERRY W. KIRCHER  
GENERAL COUNSEL

WILLIAM PITTARD  
DEPUTY GENERAL COUNSEL

U.S. HOUSE OF REPRESENTATIVES  
OFFICE OF GENERAL COUNSEL

219 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-6532  
(202) 225-9700  
FAX: (202) 226-1360

March 3, 2016

TODD B. TATELMAN  
SENIOR ASSISTANT COUNSEL

ELENI M. ROUMEL  
ASSISTANT COUNSEL

ISAAC B. ROSENBERG  
ASSISTANT COUNSEL

KIMBERLY HAMM  
ASSISTANT COUNSEL

SARAH E. CLOUSE  
SENIOR STAFF ATTORNEY

SARAH K. CURRAN  
STAFF ATTORNEY

**BY FEDERAL EXPRESS**

Timothy A. Bass, Assistant U.S. Attorney  
Office of the U.S. Attorney for the Central District of Illinois  
318 South 6th Street  
Springfield, IL 62701-1806

**Re: Grand Jury Investigation – Former Congressman Aaron Schock**

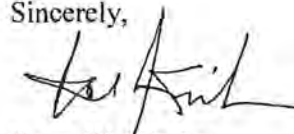
Tim:

I write on behalf of the Honorable William Plaster, Chief Administrative Officer of the U.S. House of Representatives ("CAO"), with regard to an October 1, 2016 grand jury subpoena duces tecum which was directed to the CAO, and which seeks three categories of emails.

The CAO is producing at this time an external hard drive containing emails responsive to Category 3 of the subpoena. The emails are in .pdf format, and bates-numbered CAOEmails\_0007399 through CAOEmails\_0420082. Former Congressman Schock's counsel has advised us that the former Congressman (i) is not asserting any Speech or Debate objections with respect to the CAO's production of these records, but (ii) affirmatively is not waiving any of his Speech or Debate protections as to these records.

Thank you for your attention.

Sincerely,



Kerry W. Kircher

Enclosure

cc (w/ enclosure): George J. Terwilliger III, Esq.

cc (w/o enclosure): Honorable William Plaster

**RECEIVED**

MAR 04 2016

U.S. ATTORNEY  
SPRINGFIELD, ILLINOIS

KERRY W. KIRCHER  
GENERAL COUNSEL

WILLIAM PITTARD  
DEPUTY GENERAL COUNSEL

U.S. HOUSE OF REPRESENTATIVES  
OFFICE OF GENERAL COUNSEL  
219 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-6532  
(202) 225-9700  
FAX: (202) 226-1360

TODD B. TATELMAN  
SENIOR ASSISTANT COUNSEL

ELENI M. ROUMEL  
ASSISTANT COUNSEL

ISAAC B. ROSENBERG  
ASSISTANT COUNSEL

KIMBERLY HAMM  
ASSISTANT COUNSEL

SARAH E. CLOUSE  
SENIOR STAFF ATTORNEY

SARAH K. CURRAN  
STAFF ATTORNEY

March 8, 2016

**BY FEDERAL EXPRESS**

Timothy A. Bass, Assistant U.S. Attorney  
Office of the U.S. Attorney for the Central District of Illinois  
318 South 6th Street  
Springfield, IL 62701-1806

**Re: Grand Jury Investigation – Former Congressman Aaron Schock**

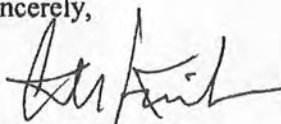
Tim:

I write on behalf of the Honorable William Plaster, Chief Administrative Officer of the U.S. House of Representatives (“CAO”), with regard to an October 1, 2016 grand jury subpoena duces tecum which was directed to the CAO, and which seeks three categories of emails.

The CAO is producing at this time an external hard drive containing emails responsive to Category 1 of the subpoena. The emails are in .pdf format, and bates-numbered CAOEmails\_0420083 to CAOEmails\_1620236. Former Congressman Schock’s counsel has advised us that the former Congressman (i) is not asserting any Speech or Debate objections with respect to the CAO’s production of these records, but (ii) affirmatively is not waiving any of his Speech or Debate protections as to these records.

Thank you for your attention.

Sincerely,



Kerry W. Kircher

Enclosure

cc (w/ enclosure): George J. Terwilliger III, Esq.  
cc (w/o enclosure): Honorable William Plaster

**RECEIVED**

MAR 09 2016

U.S. ATTORNEY  
SPRINGFIELD, ILLINOIS

# **EXHIBIT E**

**Bass, Tim (USAILC)**

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**From:** Bass, Tim (USAILC)  
**Sent:** Wednesday, December 07, 2016 12:54 PM  
**To:** Terwilliger, George J. III (GTerwilliger@mcguirewoods.com); Bittman, Robert J. (RBittman@mcguirewoods.com); Lewis, Nicholas B. (NLewis@mcguirewoods.com); Egan, Christina M. (CEgan@mcguirewoods.com); Lang, Jeff (JLang@L-WLAW.com)  
**Subject:** Disclosure of Certain Emails  
**Attachments:** emails.pdf

Counsel:

In addition to the attached email that Mr. Schock previously produced, we have just recently reviewed certain additional emails produced by others that are also attached and may or may not have some relevance to you. We wanted to bring them to your attention prior to the hearing next week. We leave the question of relevance to your judgment. As we continue our review, we will disclose any additional related matters that come to our attention. Thank you.

Tim

Timothy A. Bass  
Assistant United States Attorney  
Central District of Illinois