



U.S. Department of Justice

United States Attorney
Northern District of Illinois

Scott R. Paccagnini
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November 13, 2019

Custodian of Records
Housing Authority of the City of Freeport
1052 West Galena Avenue
Freeport, IL 61032

Re: Subpoena Duces Tecum - 19 GJ 193

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.

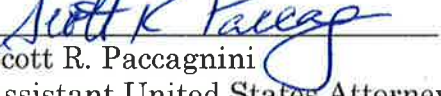
In lieu of producing the records at the location and time specified on the subpoena, the subpoenaed records may be sent on or before that date to my attention at the above address.

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 (815) 987-4444. Thank you for your assistance.

Very truly yours,

JOHN R. LAUSCH, JR.
United States Attorney

By: 
Scott R. Paccagnini
Assistant United States Attorney

ATTACHMENT TO SUBPOENA
19 GJ 193
Housing Authority of the City of Freeport

1. Any and all records relating to any withdrawal and/or request for money from HUD's Line of Credit Control System (LOCCS) from January 1, 2009 to Present day. This should include any and all vendor and contractor contracts, invoices, requests for work, receipts and correspondence which supported any LOCCS withdrawal/payment request;
2. All receipts and records of payment from the Housing Authority of the City of Freeport to any vendors or contractors from January 1, 2009 to Present day;
3. All records of any payments made to the Housing Authority of the City of Freeport by any vendor or contractor from January 1, 2009 to Present day;
4. Complete record of any and all signature cards, or records indicating signatory authority, for any bank account controlled by the Housing Authority of the City of Freeport from January 1, 2009 to Present day;
5. All Housing Authority of the City of Freeport board meeting minutes and records relating to any meeting from January 1, 2009 to Present day. This should include any and all board resolutions;
6. Any and all executed Section 3 agreements with any contractor from January 1, 2009 to Present day;
7. Any and all documents related to the Northern Illinois Community Connections (N.I.C.C.) to include email correspondence;
8. Any and all documents related to the Workplace Development Initiative (WDI) to include any email correspondence;
9. Any and all documents related to the Peter Flynn Scholarship Fund, Scholarship Luncheon, to include any email correspondence; and,
10. Complete personnel files for the following former or current Housing Authority of the City of Freeport employees: Larry Williams, Andra Taylor, Odessa Walker, Brenda Westfall, Thomas Cassidy, Mark Greenfield.

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF ILLINOIS

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: **Custodian of Records**
Housing Authority of the City of Freeport
1052 West Galena Avenue
Freeport, IL 61032

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.

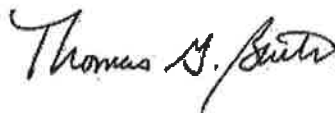
Place: Stanley J. Roszkowski United States Courthouse 327 South Church Street Rockford, Illinois 61101 Grand Jury: SEPTEMBER 2019 GRAND JURY 19 GJ 193	Date and Time: December 10, 2019 9:00 a.m.
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You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

See attachment.

Date: November 13, 2019

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:

Scott R. Paccagnini (scott.paccagnini2@usdoj.gov)
Assistant United States Attorney
327 South Church Street, Suite 3300
Rockford, Illinois 61101
(815) 987-4444

**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)

PROOF OF SERVICE

This subpoena for (name of individual or organization) _____

was received by me on (date) _____.

I served the subpoena by delivering a copy to the named person as follows: _____

**Custodian of Records
Housing Authority of the City of Freeport
1052 West Galena Avenue
Freeport, IL 61032**

_____ on (date) _____ ; or

I returned the subpoena unexecuted because: _____

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: