

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF ILLINOIS

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Will County Regional Office of Education
Administrative Agent for Professional Development Alliance
Attn: Superintendent Lisa Caparelli-Ruff
116 North Chicago St. Suite 400
Joliet, IL 60432

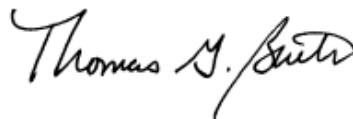
YOU ARE COMMANDED to appear in this United States District Court at the time, date, and place shown below to testify before the Court's Grand Jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: Everett McKinley Dirksen United States Courthouse 219 S. Dearborn, Rm. 1625 Chicago, Illinois 60604 Grand Jury: SPECIAL NOVEMBER 2023 GRAND JURY 24 GJ 183	Date and Time: June 24, 2024 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: **June 5, 2024**



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

JARED C. JODREY (jared.jodrey@usdoj.gov)
Assistant United States Attorney
219 S. Dearborn, Rm. 500
Chicago, Illinois 60604; [REDACTED]

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: _____

_____ 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:

SUBPOENA ATTACHMENT
Will County Regional Office of Education
Attn: Superintendent Lisa Caparelli-Ruff
Joliet, IL 60432
(24 GJ 183)

For the time period from January 1, 2012, through to the present, produce the following relating to the Professional Development Alliance:

- All contracts, memorandums of understanding, or other documented agreements with Vista Learning, NFP, or its representatives.
- All records relating to the services provided to or by Vista Learning, NFP, and its employees and contractors, including employee time sheets, logs of activity, invoices and descriptions of services rendered or received.
- All records relating to the services provided to or by the Majestic Isle Casino, and its employees and contractors, including employee time sheets, logs of activity, invoices and descriptions of services rendered or received.
- All payment records related to the services provided to or by Vista Learning, NFP, including invoices, purchase orders, copies of checks, payroll records, bank transfers, wire transfers, and receipts.
- All correspondence with Vista Learning, NFP, or its representatives, including letters, emails, and any other documented forms of communication.
- A list of all board members, managers, supervisors, employees, contractors, and subcontractors of the Professional Development Alliance.
- All documentation related to Board meetings for the Professional Development Alliance, including minutes, agendas, attachments, and recordings if made.
- All employment and payroll records, including dates of employment, wages or commissions paid, benefits paid, checks (front and back) paid to employees (including officers), check stubs, applications for employment, personnel files, credit checks, background investigations, and employee performance reviews for the following employees:
 - Joel Rogers
 - Tara Ehlers
 - Jason Bross
 - Emily Dryier
 - Brett Housman
 - Steven Scranton
 - Megan Shea

- All tax forms, including Wage and Tax Statements (Forms W-2 and W-3); Withholding Exemption Certificates (Form W-4); and U.S. Information Returns (Form 1099) disclosing payment of fees, commissions, etc., for the following employees:
 - Joel Rogers
 - Tara Ehlers
 - Jason Bross
 - Emily Dryier
 - Brett Housman
 - Steven Scranton
 - Megan Shea
- All property rental agreements and shared-property rental agreements, including lease agreements, contracts, and memorandums of understanding.



U.S. Department of Justice

*United States Attorney
Northern District of Illinois*

JARED C. JODREY
Assistant United States Attorney

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

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June 5, 2024

Will County Regional Office of Education
Administrative Agent for Professional Development Alliance
Attn: Superintendent Lisa Caparelli-Ruff
116 North Chicago St. Suite 400
Joliet, IL 60432

Re: Subpoena Duces Tecum – 24 GJ 183

Dear Ms. Caparelli-Ruff:

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 Justin Burt, US Department of Education, Office of Inspector General, 230 S. Dearborn St, Suite 3964, Chicago, IL 60604; Justin.Burt@ed.gov**. Please contact Agent Burt at: [REDACTED] 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,

MORRIS PASQUAL
Acting United States Attorney

By: s/ Jared C. Jodrey
JARED C. JODREY
Assistant United States Attorney

Enclosures

**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)

_____, _____.

(city)

(state)