

UNITED STATES DISTRICT COURT

Northern

DISTRICT OF

Ohio

TO:

Summit County
C/O Custodian of RecordsSUBPOENA TO TESTIFY
BEFORE GRAND JURY

SUBPOENA FOR:

☐ PERSON☒ DOCUMENT(S) OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE

Carl B. Stokes U.S. Courthouse
801 W. Superior Avenue
Cleveland, Ohio 44113

COURTROOM

Grand Jury Suite, Lower Level 1

DATE AND TIME

11/18/2014 9:00 am

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):*

Please see attachment.

DO NOT SEND RECORDS TO THE U.S. ATTORNEYS OFFICE

YOU MAY SEND THE REQUESTED RECORDS, PREFERABLY IN ELECTRONIC FORMAT ON CD, VIA EXPRESS MAIL, OR OVERNIGHT DELIVERY SERVICE DIRECTLY TO SPECIAL AGENT CHRISTOPHER FASSLER, FEDERAL BUREAU OF INVESTIGATION, 222 SOUTH MAIN STREET, SUITE 210, AKRON, OHIO 44308, OR IN ELECTRONIC FORMAT VIA E-MAIL TO christopher.fassler@ic.fbi.gov, AND THEREBY AUTHORIZE THE SPECIAL AGENT TO PRESENT THE DOCUMENTS TO THE GRAND JURY ON YOUR BEHALF.

☐ Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK

GERI M. SMITH

(By) Deputy Clerk

/s/ T. Jeffrey Miller



DATE

10/28/2014

This subpoena is issued on application of the United States of America

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY

Antoinette T. Bacon, Assistant U.S. Attorney
400 United States Courthouse, 801 West Superior Avenue
Cleveland, Ohio 44113 Telephone: (216) 622-3966
Special Agent Christopher Fassler Telephone: (330) 258-4107

* If not applicable, enter "none".

USAO# 2013R01124

Subpoena Attachment

Summit County

Unless otherwise noted, the time period is January 1, 2013 to present.

1. All documents reflecting Tamela Lee's schedule. This includes, but is not limited to, calendars, invitations, event agendas, emails discussing Lee's whereabouts, and travel reimbursement requests.
2. All personnel records for Tamela Lee. This includes, but is not limited to, payroll information.
3. All documents related to any character reference made by or on behalf of Tamela Lee. This includes, but is not limited to, communications between Lee and Kent Starks related to the character reference.
4. All documents reflecting communications between Tamela Lee and a constituent. This includes, but is not limited to, email, notes, letters, and communications made related to the constituent request. This includes all communications between Lee and Kent Starks related to constituent communications.
5. All documents relating to Tamela Lee's effort to influence any judicial proceeding. This includes, but is not limited to, documents reflecting case numbers, parties to a lawsuit or criminal case, notes regarding the nature of the case, any document that reflects communication with court staff, such as a bailiff, judge, or judicial clerk. This does not include any matter to which Summit County was a party and on which Lee participated in her role as a member of County Council.
6. All documents relating to Tamela Lee's effort to influence any law enforcement decision. This includes, but is not limited to, documents reflecting communications with law enforcement and prosecutors, notes regarding the nature of any matter, and reports and documents created in relation to such matter.
7. All documents related to Tamela Lee's effort to influence any administrative agency, such as Summit County Children Services or a state licensing agency. This includes, but is not limited to, documents reflecting case numbers, parties to an action, notes regarding the nature of the issue, and any document that reflects a communication with agency staff.

8. All documents related to things of value offered to, provided to, or solicited by Tamela Lee. This includes, but is not limited to, loans, gifts, employment agreements, and campaign contributions.
9. All documents related to the following family names:
 - A. Abdelqader
 - B. Albanna
 - C. Hamed
 - D. Alhaj Mohd

DEFINITIONS

- A. "Communication" means any disclosure, transfer, or exchange of information, however made, including oral, electronic, or written.
- B. "Document" means the **original** of any written, recorded, or graphic material, whether prepared by You or by any other person, that is in Your possession, custody, or control, including but not limited to: memoranda, reports, letters, telegrams, electronic mail, Personal Digital Assistants (PDAs), other electronic correspondence, and other communications recorded in any form or medium; notes, minutes, and transcripts of conferences, meetings and telephone or other communications; contracts and other agreements; checks, check registers, statements, ledgers, and other records of financial matters or commercial transactions; appointment books, calendars, notebooks, and diaries; maps, diagrams, graphs, charts, and other drawings; plans and specifications; publications; photographs; photocopies, microfilm, and other copies or reproductions; tapes, disks, and other electronic recordings; computer printouts; tallies, tabulations, and summaries of sales or bids; and all file folders, file tabs, folder tabs, mailing envelopes, facsimile transmission cover sheets, and any other proof or indicia of mailing (if applicable) associated with each original. The term "document" includes all drafts of a document, including all copies that differ in any way from the original (including any notations, underlining, or other markings). **The term "document" includes all information stored in machine-readable form or accessible through computer or other information retrieval systems, together with instructions and all other materials necessary to use or interpret such information.**
- C. "Person" means any natural person, association, cooperative, public or private corporation, joint venture, partnership, sole proprietorship, governmental entity, or other form of business or legal entity.
- D. "Relate to" or "relating to" means directly or indirectly refer or pertain to, discuss, describe, reflect, contain, examine, analyze, study, report on, comment on, evidence, constitute, show, consider, recommend, concern, record, or set forth, in whole or in part.
- E. "You" or "Your Company" means the person to whom this subpoena is addressed; any parent, predecessor, successor, division, affiliate, or subsidiary (whether wholly owned or not) of that person; any joint venture to which any such person is or was a party; and each officer, director, manager, partner, employee, attorney, agent, representative, consultant, affiliated person, or other person acting on behalf of any of them.

- F. All documents produced must be **originals**, unless otherwise indicated. Photocopies will be accepted only after demonstrating that the originals are unavailable.
- G. Use of the singular or the plural in this subpoena should not be deemed a limitation, and the use of the singular should be construed to include, where appropriate, the plural. The conjunctive form "and" and the disjunctive form "or" are mutually interchangeable and encompass each other. The terms "any" and "all" are mutually interchangeable and encompass each other.
- H. For each document or portion thereof withheld under a claim of privilege, You must submit a sworn or certified statement containing a statement of the basis on which the privilege is claimed and identifying: the paragraph in this schedule of documents to which the document is responsive; the author, date, number of pages and subject matter of the withheld document; each person to whom the withheld material was sent; and each person to whom the withheld material or its contents, or any part thereof, was disclosed. Any document or part of a document withheld under a claim of privilege must be preserved.
- I. If any portion of any document is responsive to any paragraph, then the entire document must be produced, including all supporting, underlying, or explanatory documents and all attached, annexed, or appended documents. If a document contains privileged material, the entire document must be produced, with the privileged material redacted and documented as set forth above.
- J. Documents that in their original condition were stapled, clipped, or otherwise fastened together should be produced in such form. Documents should not be shuffled or otherwise rearranged, but should be produced in the order in which they appear in Your files.
- K. You should identify with your initials each document produced, and consecutively number each document produced. Your initials and numbers should appear in the lower right-hand corner of each page, in a location that does not obscure any information on the document.
- L. The definition of "document," as used in this Schedule, includes data stored in any electronic form. You should *immediately* take the following steps to ensure that it preserves all types of electronic data in any location within the computer systems that may be responsive to the subpoena:
- M. All data that are stored electronically must be produced in an electronic format. You must contact the attorneys for the government to determine, with the assistance of the appropriate government technical officials, whether the proposed data formats and choice of media will be compatible with government equipment and resources that are available to the grand jury.

NOTICE: Any person who withholds, alters or destroys documents demanded by this subpoena may be subject to criminal prosecution for obstruction of justice, contempt of court or other federal crimes. Conviction of any of these offenses is punishable by substantial fines, imprisonment, or both.

**CERTIFICATE OF AUTHENTICITY
OF
BUSINESS RECORDS**

I, _____, declare, pursuant to Title 28, U.S.C. § 1746,
(Name)

that I am employed by _____ and that
(Name of Business)

my official title or position is _____. I further
(Official Title or Position)

declare that I am a custodian of records of said business and that each of the records attached
hereto is the original or a duplicate (exact photocopy) of an original record in the custody
of _____.
(Name of Business)

I further state 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; and
- D) if such record is not the original, such record is a duplicate of the original.

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

(Signature)

(Date of Execution)

(Place of Execution)