

**FOSTER INVESTIGATIONS, LTD
AFFIDAVIT OF SERVICE OF PROCESS**

Case Number: 17 CF 1025

People of the State of Illinois
Plaintiff
vs.

John Y. Butler
Defendant

Received by Foster Investigations, Ltd. to be served on Tammy Hansen
2350th SVCR Rd 2100E, Atlanta, IL

I, Mark Foster, who, being duly sworn, depose and say that on the 16 day of July, 2020 at 6:40am executed by delivering a true copy of the

Subpoena, Witness Fee & Correspondence from Attorney Bullington dated July 14, 2020

In accordance with the state statutes in the manner marked below:

X INDIVIDUAL SERVICE: Served the within-named person

_____ SUBSTITUTE SERVICE: By leaving copies at the usual place of abode of the defendant with a person, of age 13 years or upward, informing that person of the contents.

Name: _____ Relation: _____
Date copy mailed: _____

_____ SERVICE ON:
Left a copy of the document(s) with the following:
Name: _____ Title: _____

_____ OTHER SERVICE: As described in the comments below by serving _____ as _____


_____ NON SERVICE: For the reason detailed in the Comments below.


COMMENTS:

Age: 55 Sex: F Race: W

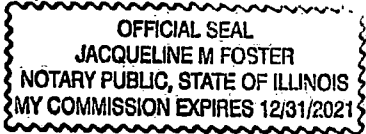
I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and sworn to before me on the 26 day of July, 2020 by the affiant who is personally known to me.


Mark Foster
Licensed Private Detective
Illinois License #: 115-001201


NOTARY PUBLIC

FOSTER INVESTIGATIONS, LTD
PO BOX 863
Normal, IL 61761
(309) 862-3473



McLEAN **FILED** **COUNTY**
JUL 28 2020
CIRCUIT CLERK

FOSTER INVESTIGATIONS, LTD
AFFIDAVIT OF SERVICE OF PROCESS

Case Number: 17 CF 1025

People of the State of Illinois
Plaintiff
vs.

John Y. Butler
Defendant

Received by Foster Investigations, Ltd. to be served on Laura Jonen
9335 Hilltop Lane, Bloomington, IL 61705

I, Mark Foster, who, being duly sworn, depose and say that on the 14 day of
July, 2020 at 5:22pm executed by delivering a true copy of the

Subpoena, Witness Fee & Correspondence from Attorney Bullington dated July 14, 2020

in accordance with the state statutes in the manner marked below:

X INDIVIDUAL SERVICE: Served the within-named person

_____ SUBSTITUTE SERVICE: By leaving copies at the usual place of abode of the defendant
with a person, of age 13 years or upward, informing that person of the contents.
Name: _____ Relation: _____
Date copy mailed: _____

_____ SERVICE ON:
Left a copy of the document(s) with the following:
Name: _____ Title: _____

_____ OTHER SERVICE: As described in the comments below by serving
_____ as _____

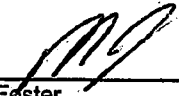
_____ NON SERVICE: For the reason detailed in the Comments below.

COMMENTS:

Age: 63 Sex: F Race: W

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and sworn to before me on the _____ day of _____, 2020
by the affiant who is personally known to me.



Mark Foster
Licensed Private Detective
Illinois License #: 115-001201

NOTARY PUBLIC

FOSTER INVESTIGATIONS, LTD
PO BOX 863
Normal, IL 61761
(309) 862-3473

McLEAN
FILED
JUL 28 2020
CIRCUIT CLERK
COUNTY

FOSTER INVESTIGATIONS, LTD
AFFIDAVIT OF SERVICE OF PROCESS

Case Number: 17 CF 1025

People of the State of Illinois
Plaintiff

vs.

John Y. Butler
Defendant

Received by Foster Investigations, Ltd. to be served on Barb Adkins
44 Parkshores Dr., Bloomington, IL 61701

I, Mark Foster, who, being duly sworn, depose and say that on the 14 day of July, 2020 at 7:17pm executed by delivering a true copy of the

Subpoena, Witness Fee & Correspondence from Attorney Bullington dated July 14, 2020

in accordance with the state statutes in the manner marked below:

INDIVIDUAL SERVICE: Served the within-named person

SUBSTITUTE SERVICE: By leaving copies at the usual place of abode of the defendant with a person, of age 13 years or upward, informing that person of the contents.

Name: _____ Relation: _____
Date copy mailed: _____

SERVICE ON: _____

Left a copy of the document(s) with the following:
Name: _____ Title: _____

OTHER SERVICE: As described in the comments below by serving _____ as _____


NON SERVICE: For the reason detailed in the Comments below.

COMMENTS:

Age: 60 Sex: F Race: B

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and sworn to before me on the 26 day of July, 2020 by the affiant who is personally known to me.


Mark Foster
Licensed Private Detective
Illinois License #: 115-001201


NOTARY PUBLIC



FOSTER INVESTIGATIONS, LTD
PO BOX 863
Normal, IL 61761
(309) 862-3473

FILED
JUL 28 2020
McLEAN COUNTY
CIRCUIT CLERK

FOSTER INVESTIGATIONS, LTD
AFFIDAVIT OF SERVICE OF PROCESS

Case Number: 17 CF 1025

People of the State of Illinois
Plaintiff
vs.

John Y. Butler
Defendant

Received by Foster Investigations, Ltd. to be served on Valerie Smith
609 Washington Street, Minonk, IL 61760

I, Mark Foster, who, being duly sworn, depose and say that on the 15 day of
July, 2020 at 7:00pm executed by delivering a true copy of the.

Subpoena, Witness Fee & Correspondence from Attorney Bullington dated July 14, 2020

in accordance with the state statutes in the manner marked below:

X INDIVIDUAL SERVICE: Served the within-named person

SUBSTITUTE SERVICE: By leaving copies at the usual place of abode of the defendant with a person, of age 13 years or upward, informing that person of the contents.

Name: _____ Relation: _____
Date copy mailed: _____

SERVICE ON:

Left a copy of the document(s) with the following:
Name: _____ Title: _____

OTHER SERVICE: As described in the comments below by serving _____ as _____

NON SERVICE: For the reason detailed in the Comments below:

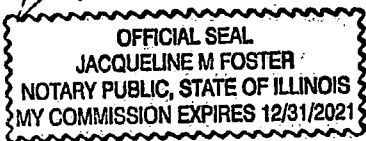
COMMENTS:

Age: 57 Sex: F Race: W

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and sworn to before me on the 26 day of July, 2020
by the affiant who is personally known to me.

Jacqueline M Foster
NOTARY PUBLIC



Mark Foster
Mark Foster
Licensed Private Detective
Illinois License #: 115-001201

FOSTER INVESTIGATIONS, LTD
PO BOX 863
Normal, IL 61761
(309) 862-3473

McLEAN
FILED
JUL 28 2020
CIRCUIT CLERK
COUNTY

FOSTER INVESTIGATIONS, LTD
AFFIDAVIT OF SERVICE OF PROCESS

Case Number: 17 CF 1025

People of the State of Illinois
Plaintiff
vs.

John Y. Butler
Defendant

Received by Foster Investigations, Ltd. to be served on Traci Andracke
902 Witten Woods Drive, Bloomington, IL 61704

I, Mark Foster, who, being duly sworn, depose and say that on the 17 day of
July, 2020 at 9:05am executed by delivering a true copy of the

Subpoena, Witness Fee & Correspondence from Attorney Bullington dated July 14, 2020

in accordance with the state statutes in the manner marked below:
 INDIVIDUAL SERVICE: Served the within-named person

SUBSTITUTE SERVICE: By leaving copies at the usual place of abode of the defendant
with a person, of age 13 years or upward, informing that person of the contents.
Name: _____ Relation: _____
Date copy mailed: _____

SERVICE ON:
Left a copy of the document(s) with the following:
Name: _____ Title: _____

OTHER SERVICE: As described in the comments below by serving
_____ as _____

NON SERVICE: For the reason detailed in the Comments below.

COMMENTS:

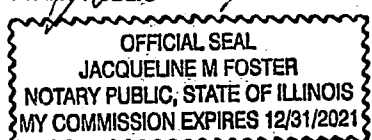
Age: 42 Sex: F Race: W

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction
in which this service was made.

Subscribed and sworn to before me on the 26 day of July, 2020
by the affiant who is personally known to me.

[Signature]
Mark Foster
Licensed Private Detective
Illinois License #: 115-001201

[Signature]
NOTARY PUBLIC



FOSTER INVESTIGATIONS, LTD
PO BOX 863
Normal, IL 61761
(309) 862-3473

FILED
JUL 28 2020
McLEAN COUNTY
CIRCUIT CLERK

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

THE PEOPLE OF THE)
STATE OF ILLINOIS,)
Plaintiff,)
)
vs.) No. 2017-CF-1025)
))
))
JOHN BUTLER,)
Defendant.)

McLEAN COUNTY
FILED
JUL 27 2020
CIRCUIT CLERK

NOTICE OF INTENT TO OFFER EVIDENCE OF PRIOR BAD ACTS EVIDENCE

NOW COMES, the People of the State of Illinois, by Assistant State’s Attorneys, Bradly Rigdon and Chris Spanos, for the Office of the State’s Attorney of McLean County, Illinois, and pursuant to prior proceedings in this matter, provide notice of the State’s intent to offer evidence of prior bad acts under Rule 404(b) of the Illinois Rules of Evidence, and states as follows:

1. That during the hearing on the Defendant’s Motion in Limine conducted on March 6, 2020, the State informed the Court and counsel of no known prior bad acts that were intended to be utilized during the trial in this matter; however, the State reserved the right to alert the Court and counsel if such intent arose.
2. Rule 404(b) allows for the admission of other crimes, wrongs, or acts evidence at a trial when “[s]uch evidence may also be admissible for other purposes, such as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident. IL R EVID Rule 404.
3. The scope of the admissibility of such evidence has been addressed in multiple cases. In *Kimbrough*, the court ran through a list, citing to numerous other matters, in its holding that “[t]hus, evidence of the commission of other crimes is admissible if it is relevant to

prove modus operandi, motive, knowledge, intent, absence of mistake or accident, defendant's state of mind, absence of an innocent frame of mind or the presence of criminal intent, circumstances or context of defendant's arrest, placement of defendant in proximity to the time and place of the crime, identification of the weapon used in the crime, consciousness of guilt, that the crime charged was part of a common design, scheme or plan of the defendant, circumstances of the crime charged that would otherwise be unclear, whether the crime charged was actually committed and opportunity or preparation." *People v. Kimbrough*, 138 Ill. App. 3d 481, 484-85, (1st Dist. 1985).

4. Through ongoing trial preparations, the State has determined that three areas of evidence presentation may fall under this section of the rules and notice of such intent is appropriate based upon the State's representations at the prior proceeding.
5. The areas in which the State intends to elicit evidence are:

- a. The presence of a shredding truck and the destruction of documents in the final days that the Defendant's corporation, CIAM, occupied the U.S. Cellular Coliseum in 2016.

- i. Said evidence will be elicited through the testimony of witnesses. During the course of the investigation, the Illinois State Police utilized subpoenas duces tecum, search warrants, and consent to obtain voluminous records. However, during the course of the investigation, an unknown number of documents relating to the billing and invoicing for events, catering, and other matters were not recovered. The shredding truck and destruction of documents were described by multiple individuals.

ii. Pursuant to Rule 404(b), the presence of that vehicle is evidence of intent to destroy documents which would show evidence of wrongdoing, the absence of mistake in the fact that they were never provided to investigators, as well as the plan and knowledge to ensure that the City of Bloomington did not get a full understanding as to the extent of the fraudulent conduct and theft committed by the Defendant and his codefendants.

(b) The attempt to remove fixtures and equipment from the U.S. Cellular Coliseum prior to exiting the premises.

i. Multiple charges relate to the theft of funds through fraudulent billing and invoicing for cleaning equipment over a course of years.

ii. Pursuant to Rule 404(b), the attempt to remove equipment at that time shows the evidence of wrongdoing in that it provides further evidence of the intent, plan, preparation, and knowledge on the ongoing theft at the time of the exit from the facility and termination of the contract. It goes to show that there was an absence of mistake in billing practices related to equipment as well as the request for funds in the month prior to the time of the departure from the facility.

(c) Information relating to the prior audit and fine in 2010 levied against BMI Concessions by the Illinois Department of Revenue.

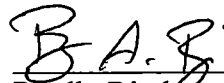
i. Pursuant to Rule 404(b), the prior sanction and the timing of the sanction provides further evidence of the intent, plan, preparation, knowledge, and motive behind the utilization of the "Kelly Discount" as a mechanism to

secretly withhold approximately \$34,000 in funds that should have been due and payable to the City of Bloomington. The audit and fine provide further evidence of the knowledge and absence of mistake as it relates to the appropriate utilization of sales tax exemption.

6. If, as trial preparations continue, the State becomes aware of additional information that fall into this category or plans to use additional evidence that falls into this category, the State will appropriately supplement this Notice.

WHEREFORE, the People of the State of Illinois respectfully request that the Court accept this notice of potential evidence, as ordered by prior ruling, for which the State may seek admission under Rule 404(b) and, if admission under that section is disputed, that a hearing be conducted to determine the admissibility of said evidence prior to the commencement of the trial in this matter.

Respectfully Submitted,



Bradly Rigdon
Assistant State's Attorney



Chris Spanos
Assistant State's Attorney

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorney's of record of all parties to the above cause by:

Depositing a true and correct copy of the same in the U.S. Post Office or post office box in the City of Bloomington, Illinois, enclosed in an envelope with postage fully prepaid on the 27 day of July, 2020.

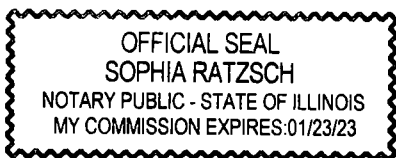
Hand delivering a true and correct copy of the same on the ___ day of _____, 2020.

Emailing a true and correct copy of the same on the 27 day of July, 2020.

[Handwritten Signature]

Subscribed to and sworn before me this 27 day of July, 2020.

[Handwritten Signature]
Notary Public



STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

THE PEOPLE OF THE
STATE OF ILLINOIS,
Plaintiff,

vs.

JOHN BUTLER,
Defendant.

No. 2017-CF-1025

McLEAN COUNTY
FILED
JUL 27 2020
CIRCUIT CLERK

*Parties must obtain
leave of Court
to introduce CO Co statement*

NOTICE OF INTENT TO OFFER STATEMENTS OF COCONSPIRATORS

*may be admitted under other forms
of testimony if possible admissible*

NOW COMES, the People of the State of Illinois, by Assistant State's Attorneys, Bradly

Rigdon and Chris Spanos, for the Office of the State's Attorney of McLean County, Illinois, and
pursuant to prior order of the Court, provides notice as to statements the State may elicit under the
hearsay exemption pursuant to Rule 801(d)(2)(E):

1. Statements of Paul Grazar regarding the removal of cash from the vault room within the
U.S. Cellular Coliseum.

a. Information regarding said statements were elicited during a recorded interview with
Jay Laesch. Portions of the transcript of the interview are identified below:

1st Statement

Jay Laesch: There were two separate things and um and this is just you know Paul usually telling me because like I said I was never in those meetings and you know Phil would relay it to Paul and then Paul would relay it to me, but there was a like a cash buyout which that was thousands of dollars sometimes. So if I needed-

Daniel Rossiter: For the for the promoters? Or for the events?

Jay Laesch: Yeah. It was for the event. I don't know who got it; if it was the promoter that got it, someone with the artist or whoever...

Daniel Rossiter: Okay. Right. That's what I mean.

Jay Laesch: ...would. Basically Paul would get the money or I would give him the money. You know he would tell me what he had-
Daniel Rossiter: And this was cash out of the overages

2nd statement

Jay Laesch: So like anytime there was something new like I, myself or Paul, I would have Paul- Like if it was something that he came to me about you know, I would always get John's okay to make sure and then um he would you know tell me "yep, John okayed it" or whatever and so but like you know the initial time something like that happened and then it was kinda precedent you know...

3rd Statement

Jay Laesch: I know Paul mentioned that to me. He was like "well, did you, didn't you just change the number on there like you know on the cash sheet or um you know when you rang those in sh- you know shorted or whatever" and I said "no, I was- why would I-"

2. Statements of Sabrina, the legal assistant of William Mueller, an attorney for the Defendant in 2016, detailing the request to obtain materials from Jay Laesch.

a. Information regarding said statements were elicited during a recorded interview with Jay Laesch when he played a recorded voicemail left on his cellular telephone. The transcript of the interview are identified below:

Not to be introduced unless or until further order of the court allowing it -

1st Statement

Jay Laesch: Mm hm

SABRINA: Hi Jay, it's Sabrina at Bill Mueller's office, and I am looking to get a copy of a zip drive with that uh you have for all the data that was downloaded from the BMI Concessions laptop. Uh.

Daniel Rossiter: She called (inaudible).

SABRINA: We kinda need that as quickly as possible. Either a copy or or the zip drive, either one. Uh, if you could please give me a call in the morning, my number is 827-4055. Again, my name is Sabrina, and I'm with Bill Mueller's office. Thank you. Bye bye.

Daniel Rossiter: Just for the record, this um message was left from 309-827-4055 on June 5th at 5:05 p.m. on Jay Laesch's uh personal cell phone.

SABRINA: I certainly hope they don't have anybody's phones bugged.

BILL: Why?

SABRINA: Well, because I really don't feel they need to know what what we're doing.

BILL: Oh, I think it's highly highly unlikely but I just...

SABRINA: I wouldn't put anything past the sons of bitches. Alright, what am I looking at here? Did I save this? I did. We have (inaudible). I told him to give me a call back in the morning. Oh my yi yi yi. So there's, what is it? 3500 for the month? 3490 is that last bill. So. I lost my (inaudible). I need to go home. And the rubber band isn't there. Yeah, over the years I got called on the carpet for that shit a couple different times.

BILL: What?

SABRINA: Having shit on the wrong bill. Well I mean, I'm sorry it was quite confusing. And I tried to stick with what you told me to do.

BILL: Well, I mean it's really easy when you've got 3 files open in the name of the same client.

SABRINA: And it's, it's kind of subjective.

BILL: It is kind of subjective. Yes, you're right.

SABRINA: So I don't even feel bad about it. Alright

2nd Statement

Jay Laesch: I met Sabrina at Avanti's. She called me and asked for it and I said "yeah, that's fine." And she said I can meet you wherever. I work at ISU so one day I met her at um uh Avanti's there on ISU's campus in the parking lot.

Daniel Rossiter: And you just- Did she give you a receipt for it? Anything? You just handed it to her...

Jay Laesch: No I-

Daniel Rossiter: ...and she said thanks?

Jay Laesch: Yeah. She- I just walked up and handed it to her and she said thanks and-

Daniel Rossiter: Okay.

Lisa Matheny: Did you make a copy of it for your own personal keeping?

Jay Laesch: Um. I believe I might have on my um home computer. I'm not positive on that.

Lisa Matheny: Mm.

Jay Laesch: But um just as a backup. She actually said in her voicemail or when I talked to her or both I think in both that for me I could just make a copy of it for her or whatever so I wanna say I did go ahead and make a a copy.

3. Statements of Bart Rogers regarding ownership of cleaning equipment.

- a. Information regarding said statements were elicited during a recorded interview with Jay Laesch when he played a recorded voicemail left on his cellular telephone. The transcript of the interview are identified below:

Jay Laesch: It was just kind of a once you know "here's here's this, this is what you gotta bill," and then once that amount's taken care of then it was my understanding the city then owned that equipment.

Daniel Rossiter: Okay.

Jay Laesch: That's kind of how it was explained to me from what I remember.

Daniel Rossiter: And who explained that to you?

Jay Laesch: That would've been John. John and Bart.

*No longer
CO CO Statements
Business
Records* (4.) Authorizations from Bart Rogers on "U.S. Cellular Coliseum Bill Payment Forms" and invoices pertaining to the extraordinary expenses.

*Stip that
these are
coming in* (5.) Email correspondence, including attached documents, of Kelly Klein regarding the cash infusion request in March, 2016

- a. Email dated February 27, 2016 at 7:47am to Patti-Lynn Silva

- b. Email dated March 1, 2016 at 4:52pm to Patti-Lynn Silva
- c. Email dated March 2, 2016 at 2:10pm to Patti-Lynn Silva
- d. Email dated March 9, 2016 at 3:57pm to Patti-Lynn Silva
- e. Email dated March 10, 2016 at 9:45am to Patti-Lynn Silva

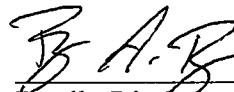
*St. P. Comm
in*

6. Email correspondence from Paul Grazar to the Defendant dated March 28, 2016 at 1:00pm.

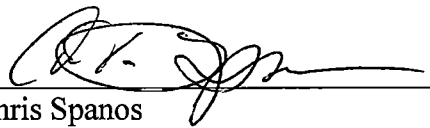
7. If, as trial preparations continue, the State becomes aware of additional information that fall into this category or plans to use additional evidence that falls into this category, the State will appropriately supplement this Notice.

WHEREFORE, the People of the State of Illinois respectfully request that the Court accept this notice of potential evidence, as ordered by prior ruling, for which the State may seek admission under Rule 801(d)(2)(E).

Respectfully Submitted,



Bradly Rigdon
Assistant State's Attorney



Chris Spanos
Assistant State's Attorney

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorney's of record of all parties to the above cause by:

Depositing a true and correct copy of the same in the U.S. Post Office or post office box in the City of Bloomington, Illinois, enclosed in an envelope with postage fully prepaid on the 27 day of July, 2020.

Hand delivering a true and correct copy of the same on the ___ day of _____, 2020.

Emailing a true and correct copy of the same on the 27 day of July, 2020.

[Handwritten Signature]

Subscribed to and sworn before me this 27 day of July, 2020.

[Handwritten Signature]

Notary Public



STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

THE PEOPLE OF THE
STATE OF ILLINOIS

VS.

JOHN BUTLER

McLEAN COUNTY
FILED
JUL 24 2020
CIRCUIT CLERK

NO. 17 CF 1025

PETITION FOR CERTIFICATION OF
MATERIALITY OF OUT OF STATE WITNESS

Now come the People of the State of Illinois by Assistant State's Attorney Bradly A. Rigdon, and moves this Court for a Certificate of Materiality of an Out of State Witness, and as grounds therefore would show:

1. John Butler has been indicted in the McLean County Circuit Court with the offenses of twenty-two counts of Theft, eight counts of Money Laundering, six counts of Filing a Fraudulent Sales and Tax Return, six counts of Wire Fraud, one count of Tax Evasion, one count of Conspiracy to Commit Tax Evasion in case number 17 CF 1025.
2. See the attached Bill of Indictments for charging documents pertaining to the case People v John Butler.
3. Michael Cox, resides at 65241 Big Pine Rd., Finlayson, MN 55735.
4. A Jury Trial in the case of People v John Butler is scheduled to commence on August 10, 2020 at 9:00AM.
5. Michael Cox is a necessary and material witness for the People of the State of Illinois in the aforementioned cause in that he is a material witness and provided statements to investigators.
6. The presence of Michael Cox will be needed within McLean County for no longer than one day.
7. Should Michael Cox come to the State of Illinois pursuant to an Order directing him to appear and testify in this cause, the laws of the State of Illinois will give him protection from arrest and the service of criminal or civil process in connection with matters which arose before his entrance in to the State of Illinois, pursuant to said Order.

8. The State of Illinois will tender \$20.00 per day and \$.20 per mile to Michael Cox as costs of transportation to and from Illinois.

WHEREFORE, the People of the State of Illinois, by and through Assistant State's Bradley A. Rigdon, requests the Court issue a certificate under seal setting forth the materiality and the number of days the witness will be required to be present in order to testify in the trial of the above-captioned cause. This request is made pursuant to ILCS, Chapter 725, Sections 220/3 through 220/6 which is reciprocal in its terms with the State of Minnesota Statutes to secure the attendance of witnesses from within or without a state in criminal proceedings.



BRADLY A. RIGDON
MCLEAN COUNTY, ILLINOIS
104 W. FRONT, ROOM 605
BLOOMINGTON, IL 61701
(309) 888-5400

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

THE PEOPLE OF THE
STATE OF ILLINOIS

VS.

JOHN BUTLER

NO. 17 CF 1025

AFFIDAVIT

Comes now Bradley A. Rigdon, who being first duly sworn upon his oath, states as follows:

1. I am an Assistant State's Attorney for McLean County, Illinois.
2. I hereby, represent that Michael Cox, a male, presently resides at 65241 Big Pine Rd., Finlayson, MN 55735, is a material and necessary witness in the upcoming trial captioned People v. John Butler, which cause is scheduled to proceed to trial on August 10, 2020 at 9:00AM.
3. I further represent that Michael Cox will be reimbursed \$.20 per mile traveled to and from court in McLean County, Illinois and given \$20.00 per day he is required to testify. Travel arrangements and hotel accommodations will be provided if necessary.

I AFFIRM, UNDER PENALTIES FOR PERJURY, THAT THE FOREGOING REPRESENTATIONS
ARE TRUE.

BA-R

BRADLY A. RIGDON
ASSISTANT STATE'S ATTORNEY
MCLEAN COUNTY, ILLINOIS

I, Bradley A. Rigdon, do swear and certify that I have read the preceding instrument, and that it is true in substance and fact to the best of my knowledge information and belief.

07/23/20
Date

B.A.R.
Bradly A. Rigdon
Assistant State's Attorney

Subscribed and sworn to me this 23 day of July, 2020.

[Signature]
Notary Public



STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

THE PEOPLE OF THE
STATE OF ILLINOIS

VS.

JOHN BUTLER

NO. 17 CF 1025

CERTIFICATE OF MATERIALITY
OF OUT OF STATE WITNESS

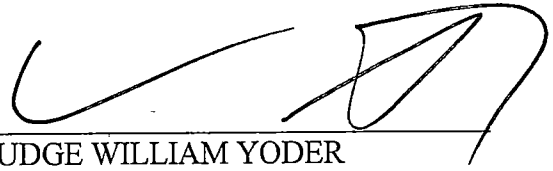
I, the HONORABLE WILLIAM YODER, Judge, McLean County Circuit Court, Eleventh Judicial Circuit of Illinois do hereby certify that:

1. There is a criminal case pending against John Butler, wherein John Butler is charged with the offenses of twenty-two counts of Theft, eight counts of Money Laundering, six counts of Filing a Fraudulent Sales and Tax Return, six counts of Wire Fraud, one count of Tax Evasion, one count of Conspiracy to Commit Tax Evasion in McLean County case number 17 CF 1025.
2. A Jury Trial is scheduled in said cause to commence at 9:00 a.m. on August 10, 2020.
3. Michael Cox is a necessary and material witness for the People of the State of Illinois in said criminal case. This finding is based upon the Petition of Certification of Materiality of Out of State Witness filed by McLean County Assistant State's Attorney Bradley A. Rigdon, which Petition has been reviewed by the Court.
4. The presence of Michael Cox will be needed within the State of Illinois on August 10, 2020.
5. Michael Cox is presently residing at 65241 Big Pine Rd., Finlayson, MN 55735.
6. Should Michael Cox come into the State of Illinois pursuant to the Order directing him to attend and testify on the above-captioned cause People v. John Butler, the laws of the State of Illinois will give him protection from arrest and the service of civil process in connection with matters which arose before his entrance into the State of Illinois pursuant to said Order.

7. This Certificate of Materiality is made for the purpose of being presented to the Judge of Pine County Circuit Court, State of Minnesota, a Court of Record, in whose jurisdiction the witness, Michael Cox, resides to compel his attendance and testimony before the Jury in the case of People v. John Butler, Case No. 17 CF 1025 as a material witness.

WITNESS, the Honorable William Yoder, McLean County Circuit Court, Eleventh Judicial Circuit of the State of Illinois, a Court of Record.

DATED THIS 23 DAY OF July, 2020



JUDGE WILLIAM YODER
MCLEAN COUNTY CIRCUIT COURT
ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY, ILLINOIS

STATE OF MINNESOTA
IN THE CIRCUIT COURT OF THE
COUNTY OF PINE

THE PEOPLE OF THE
STATE OF ILLINOIS

VS.

JOHN BUTLER

NO. 17 CF 1025

ORDER TO SHOW CAUSE/ORDER FOR HEARING

THIS CAUSE, coming on for approval of the Court, and the Court being advised by the prosecuting attorney for the Circuit Court of the Eleventh Judicial Circuit, State of Illinois, and upon receiving this Certificate, with attachments, issued the ____ day of _____, 2020, by the Honorable William Yoder, Circuit Judge, Eleventh Judicial Circuit, McLean County, Illinois, a Court of Record, requesting the appearance of Michael Cox to testify in a criminal prosecution now pending in said Court:

Let Michael Cox be ordered to appear before this Court on the 10th day of August, 2020, at 9 o'clock a.m., to there show cause why an Order should not be made:

1. Determining that Michael Cox is a necessary witness whose appearance is required in the criminal prosecution entitled People v. John Butler in McLean County Circuit Court, Eleventh Judicial Circuit, McLean County, Illinois;
2. Determining that the presence of Michael Cox be required on August 10, 2020.
3. Determining that it will not cause undue hardship to the witness, Michael Cox, to be compelled to attend and to testify in said criminal prosecution;
4. Determining that the State of Illinois will give Michael Cox protection from arrest and service of civil and criminal process, Illinois having adopted the Uniform Act to secure the attendance of witnesses from without the State in criminal proceedings;

5. Determining that an Order be issued compelling Michael Cox to attend and testify in the aforementioned criminal trial for the State of Illinois as above stated; and

6. Granting such other and further relief as this Court may deem proper.

ORDERED this ____ day of _____, 2020

JUDGE
PINE COUNTY CIRCUIT COURT
PINE COUNTY, MINNESOTA

STATE OF MINNESOTA
IN THE CIRCUIT COURT OF THE
COUNTY OF PINE

THE PEOPLE OF THE
STATE OF ILLINOIS

VS.

JOHN BUTLER

NO. 17 CF 1025

ORDER

IT APPEARING to the satisfaction of the Court that Michael Cox is a necessary and material witness in a criminal trial pending in the Circuit Court of McLean County, Illinois, in the case against John Butler with the offenses of twenty-two counts of Theft, eight counts of Money Laundering, six counts of Filing a Fraudulent Sales and Tax Return, six counts of Wire Fraud, one count of Tax Evasion, one count of Conspiracy to Commit Tax Evasion in case number 17 CF 1025, on August 10, 2020, at 9:00AM, and if said Michael Cox as a witness comes to the State of Illinois the laws of the State of Illinois will give him protection from arrest or the service of process, either civil or criminal, in connection with matters which arose before his entrance into said State under said subpoena.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, that Michael Cox appear before the Honorable William Yoder, in the criminal trial of the People v. John Butler in McLean County, Illinois on August 10, 2020, at 9:00 a.m. and all continuances thereof, then and there to testify on behalf of the State of Illinois in said criminal prosecution.

FURTHER, upon issuance of this Order, Michael Cox is to make contact by telephone with Jennifer Gant, Director of Victim Witness Services of the McLean County State's Attorney's Office, Illinois at (309) 888-5424. The exact date and time you will be needed to testify will be given to you when you contact the McLean County State's Attorney's Office.

ORDERED THIS ____ DAY OF _____, 2020

JUDGE
PINE COUNTY CIRCUIT COURT
PINE COUNTY, MINNESOTA

The People of the State of Illinois

VS.

DEFENDANT:

JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

2017 CF 1025

BILL OF INDICTMENT

COUNT 1 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 11th day of March, 2016 through the 28th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$152,887.29 OF MONEY WHICH WAS MEANT TO BE USED FOR THE PAYMENT OF UTILITIES AND OTHER
URGENT MATTERS WAS DIRECTED INTO THE BANK ACCOUNTS OF JOHN BUTLER IN THREE FINANCIAL
TRANSACTIONS,

in violation of 720 ILCS 5/16-1(a) (1) (A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Jody Thweel
Foreman

Additional ID

LIST OF WITNESSES

ISP *Rossiter*

IL Rev *Lisa Matheny*

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK
COPY

The People of the State of Illinois
VS.

17 CF1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 2 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 11th day of March, 2016 through the 28th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$152,887.29 OF MONEY WHICH WAS MEANT TO BE USED FOR THE PAYMENT OF UTILITIES AND OTHER
URGENT MATTERS WAS DIRECTED INTO THE BANK ACCOUNTS OF JOHN BUTLER IN THREE FINANCIAL
TRANSACTIONS,

COUNT 2 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 1

in violation of 720 ILCS 5/16-1(a) (2) (A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Jody Threl
Foreman

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY
FILED
SEP 20 2017
CIRCUIT CLERK
MCLEAN COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 3 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 11th day of March, 2016 through the 28th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT \$113,000
OF MONEY, WHICH WAS REPRESENTED WOULD BE USED FOR THE PAYMENT OF UTILITIES, WAS
DIRECTED INTO THE BANK ACCOUNTS OF JOHN BUTLER,

in violation of 720 ILCS 5/16-1(a)(1)(A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Foreman John Threlk

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

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McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 4 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 11th day of March, 2016 through the 28th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT \$113,000
OF MONEY, WHICH WAS REPRESENTED WOULD BE USED FOR THE PAYMENT OF UTILITIES, WAS
DIRECTED INTO THE BANK ACCOUNTS OF JOHN BUTLER,

COUNT 4 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 3

in violation of 720 ILCS 5/16-1(a)(2)(A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Jody Threl
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314

McLEAN COUNTY
FILED
SEP 20 2017
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Report Number: 1613024

Agency: Illinois State Police

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 5 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 5th day of May, 2010 through the 4th day of April,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY
OF BLOOMINGTON PAID, FOR REIMBURSEMENT AND FINAL PURCHASE, \$44,148.35 OVER THE COST OF
CLEANING SUPPLIES AND EQUIPMENT UTILIZED IN OPERATION OF THE COLISEUM, SAID ACTS WERE
IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED
ON OR ABOUT APRIL 4, 2016,

in violation of 720 ILCS 5/16-1(a) (1) (A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Signature]
Foreman

Additional ID
Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Rossiter, ISP Matheny, IDOR

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

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The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 6 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 5th day of May, 2010 through the 4th day of April,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY
OF BLOOMINGTON PAID, FOR REIMBURSEMENT AND FINAL PURCHASE, \$44,148.35 OVER THE COST OF
CLEANING SUPPLIES AND EQUIPMENT UTILIZED IN OPERATION OF THE COLISEUM, SAID ACTS WERE
IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED
ON OR ABOUT APRIL 4, 2016,

COUNT 6 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 5

in violation of 720 ILCS 5/16-1(a)(2)(A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

J. Ph...
Foreman

Additional ID
Hgt: 6'03" Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
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The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 7 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 5th day of May, 2010 through the 28th day of March, 2012
at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

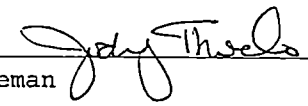
IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY
OF BLOOMINGTON PAID, FOR REIMBURSEMENT, \$33,973.91 OVER THE COST OF CLEANING SUPPLIES
AND EQUIPMENT UTILIZED IN OPERATION OF THE COLISEUM,

in violation of 720 ILCS 5/16-1(a) (1) (A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman 

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 8 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 5th day of May, 2010 through the 28th day of March, 2012
at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY
OF BLOOMINGTON PAID, FOR REIMBURSEMENT, \$33,973.91 OVER THE COST OF CLEANING SUPPLIES
AND EQUIPMENT UTILIZED IN OPERATION OF THE COLISEUM,

COUNT 8 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 7

in violation of 720 ILCS 5/16-1(a)(2)(A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

[Signature]
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN

FILED
SEP 20 2017
CIRCUIT CLERK

COPY
COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

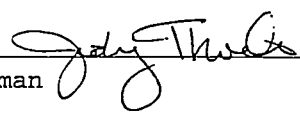
COUNT 9 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 4th day of April, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY
OF BLOOMINGTON PAID \$10,174.44 FOR CLEANING SUPPLIES AND EQUIPMENT WHICH HAD
PREVIOUSLY BEEN PAID FOR BY THE CITY OF BLOOMINGTON,

in violation of 720 ILCS 5/16-1(a)(1)(A) A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman 

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 10 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 4th day of April, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY
OF BLOOMINGTON PAID \$10,174.44 FOR CLEANING SUPPLIES AND EQUIPMENT WHICH HAD
PREVIOUSLY BEEN PAID FOR BY THE CITY OF BLOOMINGTON,

COUNT 10 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 9

in violation of 720 ILCS 5/16-1(a)(2)(A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

[Signature]
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN
FILED
SEP 20 2017
COUNTY
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 11 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 1st day of August, 2008 through the 29th day of
February, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY
OF BLOOMINGTON PAID \$140,098.05 FOR LEGAL FEES WHICH WERE DISGUISED AS "EXTRAORDINARY
EXPENSES" OF THE COLISEUM, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR
DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT FEBRUARY 29, 2016,

in violation of 720 ILCS 5/16-1(a) (1) (A) A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

Foreman

Additional ID
Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024 Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 12 :The GRAND JURY of McLean County, Illinois, charges that

JOHN YALE BUTLER on or about the 1st day of August, 2008 through the 29th day of February, 2016 at BLOOMINGTON,

in the County of McLean, State of Illinois, committed the offense of THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE, KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF \$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT THE CITY OF BLOOMINGTON PAID \$140,098.05 FOR LEGAL FEES WHICH WERE DISGUISED AS "EXTRAORDINARY EXPENSES" OF THE COLISEUM, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT FEBRUARY 29, 2016,

COUNT 12 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 11

in violation of 720 ILCS 5/16-1(a)(2)(A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Signature]
Foreman

Additional ID
Hgt: 6'03" Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 13 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 4th day of January, 2008 through the 27th day of
March, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$229,389.72 IN COMMISSIONS ON SALES OF THIRD PARTY CONCESSIONS ITEMS WAS NOT PAID TO
THE CITY OF BLOOMINGTON, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN
AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,

in violation of 720 ILCS 5/16-1(a)(1)(A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Handwritten Signature]
Foreman

Additional ID
Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

FILED
NOV 07 2018
McLEAN COUNTY
CIRCUIT CLERK

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The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 14 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 4th day of January, 2008 through the 27th day of
March, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$229,389.72 IN COMMISSIONS ON SALES OF THIRD PARTY CONCESSIONS ITEMS WAS NOT PAID TO
THE CITY OF BLOOMINGTON, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN
AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,

COUNT 14 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 13

in violation of 720 ILCS 5/16-1(a)(2)(A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Signature]
Foreman

Additional ID
Hgt: 6'03" Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 15 :The GRAND JURY of McLean County, Illinois, charges that

JOHN YALE BUTLER on or about the 4th day of November, 2007 through the 27th day of
March, 2016 at
BLOOMINGTON,

in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$186,165.67 IN COMMISSIONS ON SALES OF IMPROPERLY DISCOUNTED ITEMS, INCLUDING
DISCOUNTED CONCESSIONS ITEMS AND THE "KELLY DISCOUNT", WAS NOT PAID TO THE CITY OF
BLOOMINGTON, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN AND THE
LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,

COUNT 15 ALLEGES CONDUCT WHICH AGGREGATES COUNTS 17 AND 19

in violation of 720 ILCS 5/16-1(a)(1)(A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Signature]
Foreman

Additional ID
Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
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The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 16 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 4th day of November, 2007 through the 27th day of
March, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$186,165.67 IN COMMISSIONS ON SALES OF IMPROPERLY DISCOUNTED ITEMS, INCLUDING
DISCOUNTED CONCESSIONS ITEMS AND THE "KELLY DISCOUNT", WAS NOT PAID TO THE CITY OF
BLOOMINGTON, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN AND THE
~~LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,~~

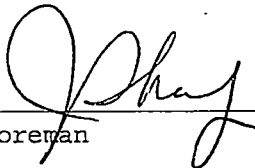
COUNT 16 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 15
COUNT 16 ALLEGES CONDUCT WHICH AGGREGATES COUNTS 18 AND 20

in violation of 720 ILCS 5/16-1(a)(2)(A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown


Foreman

Additional ID
Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN

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COUNTY

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 17 :The GRAND JURY of McLean County, Illinois, charges that

JOHN YALE BUTLER on or about the 4th day of November, 2007 through the 27th day of
March, 2016 at
BLOOMINGTON,

in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$151,404.50 IN COMMISSIONS ON SALES OF IMPROPERLY DISCOUNTED CONCESSIONS ITEMS WAS NOT
PAID TO THE CITY OF BLOOMINGTON, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION
OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,

in violation of 720 ILCS 5/16-1(a) (1) (A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Signature]
Foreman

Additional ID
Hgt: 6'03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

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The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 18 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 4th day of November, 2007 through the 27th day of
March, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$100,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
\$151,404.50 IN COMMISSIONS ON SALES OF IMPROPERLY DISCOUNTED CONCESSIONS ITEMS WAS NOT
PAID TO THE CITY OF BLOOMINGTON, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION
OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,

COUNT 18 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 17

in violation of 720 ILCS 5/16-1(a) (2) (A)

A Class X Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Signature]
Foreman

Additional ID
Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

COPY

The People of the State of Illinois

VS.

DEFENDANT:

JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 19 :The GRAND JURY of McLean County, Illinois, charges that

JOHN YALE BUTLER on or about the 18th day of January, 2013 through the 20th day of March, 2015 at

BLOOMINGTON,

in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE, KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF \$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT COMMISSIONS ON SALES OWED TO THE CITY OF BLOOMINGTON WERE REDUCED BY \$34,761.17 THROUGH THE USE OF THE "KELLY DISCOUNT", SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 20, 2015 AND THERE HAS BEEN AN ACTION PENDING FOR THE SAME CONDUCT SINCE SEPTEMBER 20, 2017 AS DESCRIBED IN 720 ILCS 5/3-7 (A)-(3),

in violation of 720 ILCS 5/16-1(a) (1) (A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

Foreman

Additional ID

Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

FILED
NOV 07 2018
MCLEAN COUNTY
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 20 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 18th day of January, 2013 through the 20th day of
March, 2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT
COMMISSIONS ON SALES OWED TO THE CITY OF BLOOMINGTON WERE REDUCED BY \$34,761.17
THROUGH THE USE OF THE "KELLY DISCOUNT", SAID ACTS WERE IN FURTHERANCE OF A SINGLE
INTENTION OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 20, 2015
~~AND THERE HAS BEEN AN ACTION PENDING FOR THE SAME CONDUCT SINCE SEPTEMBER 20, 2017 AS~~
DESCRIBED IN 720 ILCS 5/3-7 (A) (3),

COUNT 20 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 19

in violation of 720 ILCS 5/16-1(a) (2) (A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

Foreman

Additional ID
Hgt: 6 '03 " Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 21 :The GRAND JURY of McLean County, Illinois, charges that
JOHN YALE BUTLER on or about the 4th day of January, 2013 through the 29th day of
March, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWINGLY OBTAINED UNAUTHORIZED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF
\$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO
PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT CASH SALES
REPORTING ON CONCESSIONS WAS MANIPULATED, THEREBY REDUCING COMMISSIONS PAID TO THE
CITY OF BLOOMINGTON IN THE AMOUNT \$14,005, SAID ACTS WERE IN FURTHERANCE OF A SINGLE
INTENTION OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,

in violation of 720 ILCS 5/16-1(a)(1)(A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

[Signature]
Foreman

Additional ID
Hgt: 6'03 " Wgt: 250 Hair:GRY Eyes:HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
NOV 07 2018
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN YALE BUTLER
9513 N 2125 EAST
BLOOMINGTON, IL 61705

Case#: 2017CF001025



BILL OF INDICTMENT

COUNT 22 :The GRAND JURY of McLean County, Illinois, charges that

JOHN YALE BUTLER on or about the 4th day of January, 2013 through the 29th day of March, 2016 at

BLOOMINGTON,

in the County of McLean, State of Illinois, committed the offense of

THEFT

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE, KNOWINGLY, AND BY DECEPTION, OBTAINED CONTROL OVER PROPERTY, WITH VALUE IN EXCESS OF \$10,000, BELONGING TO THE CITY OF BLOOMINGTON, A GOVERNMENTAL ENTITY, AND INTENDED TO PERMANENTLY DEPRIVE THE OWNER OF THE USE OF BENEFIT OF THE PROPERTY IN THAT CASH SALES REPORTING ON CONCESSIONS WAS MANIPULATED, THEREBY REDUCING COMMISSIONS PAID TO THE CITY OF BLOOMINGTON IN THE AMOUNT \$14,005, SAID ACTS WERE IN FURTHERANCE OF A SINGLE INTENTION OR DESIGN AND THE LAST ACT OF THE THEFT OCCURRED ON OR ABOUT MARCH 31, 2016,

COUNT 22 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 21

in violation of 720 ILCS 5/16-1(a) (2) (A)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	Unknown

Foreman

Additional ID

Hgt: 6'03" Wgt: 250 Hair: GRY Eyes: HAZ

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

FILED
NOV 07 2018
McLEAN COUNTY
CIRCUIT CLERK

COPY

The People of the State of Illinois
VS.

2017 4/1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 23 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 4th day of January, 2013 through the 29th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN FINANCIAL TRANSACTIONS WITH VALUE EXCEEDING
\$10,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED SUCH FINANCIAL TRANSACTIONS WITH THE INTENT TO PROMOTE THE CARRYING ON OF
THAT THEFT IN THAT CASH SALE TRANSACTIONS OF CONCESSIONS TOTALING \$102,571.45 WERE
CONDUCTED WITH THE INTENT TO UNDERREPORT COMMISSIONS DUE TO THE CITY OF BLOOMINGTON IN
THE AMOUNT OF \$14,005,

IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (A)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 2 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Jody Throckmorton
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY
FILED
SEP 20 2017
CIRCUIT CLERK
MCLEAN COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 24 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 4th day of January, 2013 through the 29th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN FINANCIAL TRANSACTIONS WITH VALUE EXCEEDING
\$10,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED SUCH FINANCIAL TRANSACTIONS WHICH HE KNEW OR REASONABLY SHOULD HAVE KNOWN
WAS DESIGNED IN WHOLE OR IN PART TO CONCEAL OR DISGUISE THE NATURE, THE LOCATION, OR
THE SOURCE OF THE CRIMINALLY DERIVED PROPERTY IN THAT CASH SALE TRANSACTIONS OF
CONCESSIONS TOTALING \$102,571.45 WERE CONDUCTED WITH THE INTENT TO UNDERREPORT
COMMISSIONS DUE TO THE CITY OF BLOOMINGTON IN THE AMOUNT OF \$14,005,

COUNT 24 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 23
IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (B) (I)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 2 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Judy Threlk
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

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FILED

SEP 20 2017

CIRCUIT CLERK

McLEAN

COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 25 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 16th day of April, 2014 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
FILING A FRAUDULENT SALES AND USE TAX RETURN

IN THAT BMI CONCESSIONS, LLC WAS A LIMITED LIABILITY COMPANY ENGAGED IN THE BUSINESS
OF SELLING TANGIBLE PERSONAL PROPERTY AT RETAIL IN THE STATE OF ILLINOIS DURING THE
MONTH OF MARCH, 2014, HAD ITS PRINCIPLE PLACE OF BUSINESS IN MCLEAN COUNTY, ILLINOIS,
JOHN BUTLER WAS AN OFFICER OF BMI CONCESSIONS, LLC, RESPONSIBLE FOR THE FILING OF
SALES TAX RETURNS FOR SAID BUSINESS, AND AS SUCH AGENT, HE KNOWINGLY CAUSED TO BE
FILED A FRAUDULENT SALES AND USE TAX RETURN FOR SAID MONTH IN THAT HE KNOWINGLY
UNDERSTATED AMOUNTS OF TAXABLE SALES IN LINE 4A OF SAID RETURN AND THE AMOUNT OF TAX
DUE THE STATE OF ILLINOIS EXCEEDS \$300,

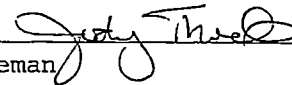
in violation of 35 ILCS 120/13 (a)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman



Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

FILED

SEP 20 2017

CIRCUIT CLERK

McLEAN

COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 26 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 16th day of April, 2014 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
WIRE FRAUD

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT HE WAS LEGALLY RESPONSIBLE, KNOWINGLY
DEvised A SCHEME TO DEFRAUD BY MEANS OF FALSE REPRESENTATIONS, AND FOR THE PURPOSE OF
EXECUTING SAID SCHEME, TRANSMITTED FROM WITHIN ILLINOIS A WRITING BY MEANS OF WIRE
WHEN HE CAUSED TO BE FILED, VIA ELECTRONIC FILING, A FRAUDULENT STATE OF ILLINOIS
SALES AND USE TAX RETURN FOR MARCH, 2014 WHICH UNDERSTATED AMOUNTS OF TAXABLE SALES IN
LINE 4A OF SAID RETURN,

COUNT 26 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 25

in violation of 720 ILCS 5/17-24(b)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman Jody Threlkeld

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN

FILED

SEP 20 2017

CIRCUIT CLERK

COUNTY

COPY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 27 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 20th day of January, 2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
FILING A FRAUDULENT SALES AND USE TAX RETURN

IN THAT BMI CONCESSIONS, LLC WAS A LIMITED LIABILITY COMPANY ENGAGED IN THE BUSINESS
OF SELLING TANGIBLE PERSONAL PROPERTY AT RETAIL IN THE STATE OF ILLINOIS DURING THE
MONTH OF DECEMBER, 2014, HAD ITS PRINCIPLE PLACE OF BUSINESS IN MCLEAN COUNTY,
ILLINOIS, JOHN BUTLER WAS AN OFFICER OF BMI CONCESSIONS, LLC, RESPONSIBLE FOR THE
FILING OF SALES TAX RETURNS FOR SAID BUSINESS, AND AS SUCH AGENT, HE KNOWINGLY CAUSED
TO BE FILED A FRAUDULENT SALES AND USE TAX RETURN FOR SAID MONTH IN THAT HE KNOWINGLY
UNDERSTATED AMOUNTS OF TAXABLE SALES IN LINE 4A OF SAID RETURN AND THE AMOUNT OF TAX
DUE THE STATE OF ILLINOIS EXCEEDS \$300,

in violation of 35 ILCS 120/13(a)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Foreman John Throckmorton

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

FILED
SEP 20 2017
McLEAN COUNTY
CIRCUIT CLERK

2017 CF 1025

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 28 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 20th day of January, 2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
WIRE FRAUD

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT HE WAS LEGALLY RESPONSIBLE, KNOWINGLY
DEvised A SCHEME TO DEFRAUD BY MEANS OF FALSE REPRESENTATIONS, AND FOR THE PURPOSE OF
EXECUTING SAID SCHEME, TRANSMITTED FROM WITHIN ILLINOIS A WRITING BY MEANS OF WIRE
WHEN HE CAUSED TO BE FILED, VIA ELECTRONIC FILING, A FRAUDULENT STATE OF ILLINOIS
SALES AND USE TAX RETURN FOR DECEMBER, 2014 WHICH UNDERSTATED AMOUNTS OF TAXABLE SALES
IN LINE 4A OF SAID RETURN,

COUNT 28 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 27

in violation of 720 ILCS 5/17-24(b) A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Judy Th...
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 29 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 16th day of April, 2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
FILING A FRAUDULENT SALES AND USE TAX RETURN

IN THAT BMI CONCESSIONS, LLC WAS A LIMITED LIABILITY COMPANY ENGAGED IN THE BUSINESS
OF SELLING TANGIBLE PERSONAL PROPERTY AT RETAIL IN THE STATE OF ILLINOIS DURING THE
MONTH OF MARCH, 2015, HAD ITS PRINCIPLE PLACE OF BUSINESS IN MCLEAN COUNTY, ILLINOIS,
JOHN BUTLER WAS AN OFFICER OF BMI CONCESSIONS, LLC, RESPONSIBLE FOR THE FILING OF
SALES TAX RETURNS FOR SAID BUSINESS, AND AS SUCH AGENT, HE KNOWINGLY CAUSED TO BE
FILED A FRAUDULENT SALES AND USE TAX RETURN FOR SAID MONTH IN THAT HE KNOWINGLY
UNDERSTATED AMOUNTS OF TAXABLE SALES IN LINE 4A OF SAID RETURN AND THE AMOUNT OF TAX
DUE THE STATE OF ILLINOIS EXCEEDS \$300,

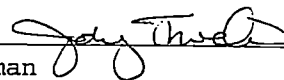
in violation of 35 ILCS 120/13(a)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman



Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

McLEAN

FILED

SEP 20 2017

CIRCUIT CLERK

COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 30 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 16th day of April, 2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
WIRE FRAUD

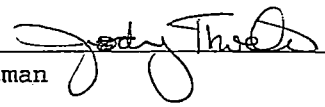
IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT HE WAS LEGALLY RESPONSIBLE, KNOWINGLY
DEvised A SCHEME TO DEFRAUD BY MEANS OF FALSE REPRESENTATIONS, AND FOR THE PURPOSE OF
EXECUTING SAID SCHEME, TRANSMITTED FROM WITHIN ILLINOIS A WRITING BY MEANS OF WIRE
WHEN HE CAUSED TO BE FILED, VIA ELECTRONIC FILING, A FRAUDULENT STATE OF ILLINOIS
SALES AND USE TAX RETURN FOR MARCH, 2015 WHICH UNDERSTATED AMOUNTS OF TAXABLE SALES IN
LINE 4A OF SAID RETURN,

~~COUNT 30 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 29~~

in violation of 720 ILCS 5/17-24(b) A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman 

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY
FILED
SEP 20 2017
CIRCUIT CLERK

McLEAN

COUNTY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

2017 CF 1025

BILL OF INDICTMENT

COUNT 31 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 19th day of June, 2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
FILING A FRAUDULENT SALES AND USE TAX RETURN

IN THAT BMI CONCESSIONS, LLC WAS A LIMITED LIABILITY COMPANY ENGAGED IN THE BUSINESS
OF SELLING TANGIBLE PERSONAL PROPERTY AT RETAIL IN THE STATE OF ILLINOIS DURING THE
MONTH OF MAY, 2015, HAD ITS PRINCIPLE PLACE OF BUSINESS IN MCLEAN COUNTY, ILLINOIS,
JOHN BUTLER WAS AN OFFICER OF BMI CONCESSIONS, LLC, RESPONSIBLE FOR THE FILING OF
SALES TAX RETURNS FOR SAID BUSINESS, AND AS SUCH AGENT, HE KNOWINGLY CAUSED TO BE
FILED A FRAUDULENT SALES AND USE TAX RETURN FOR SAID MONTH IN THAT HE KNOWINGLY
UNDERSTATED AMOUNTS OF TAXABLE SALES IN LINE 4A OF SAID RETURN AND THE AMOUNT OF TAX
DUE THE STATE OF ILLINOIS EXCEEDS \$300,

in violation of 35 ILCS 120/13(a)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Foreman *July Threlk*

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

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McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 32 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 19th day of June, 2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
WIRE FRAUD

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT HE WAS LEGALLY RESPONSIBLE, KNOWINGLY
DEVISED A SCHEME TO DEFRAUD BY MEANS OF FALSE REPRESENTATIONS, AND FOR THE PURPOSE OF
EXECUTING SAID SCHEME, TRANSMITTED FROM WITHIN ILLINOIS A WRITING BY MEANS OF WIRE
WHEN HE CAUSED TO BE FILED, VIA ELECTRONIC FILING, A FRAUDULENT STATE OF ILLINOIS
SALES AND USE TAX RETURN FOR MAY, 2015 WHICH UNDERSTATED AMOUNTS OF TAXABLE SALES IN
LINE 4A OF SAID RETURN,

COUNT 32 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 31

in violation of 720 ILCS 5/17-24(b)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Foreman Jody Threlk

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY
FILED
SEP 20 2017
MCLEAN COUNTY
CIRCUIT CLERK

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

2017 CF 1025

BILL OF INDICTMENT

COUNT 33 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 19th day of February, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
FILING A FRAUDULENT SALES AND USE TAX RETURN

IN THAT BMI CONCESSIONS, LLC WAS A LIMITED LIABILITY COMPANY ENGAGED IN THE BUSINESS
OF SELLING TANGIBLE PERSONAL PROPERTY AT RETAIL IN THE STATE OF ILLINOIS DURING THE
MONTH OF JANUARY, 2016, HAD ITS PRINCIPLE PLACE OF BUSINESS IN MCLEAN COUNTY,
ILLINOIS, JOHN BUTLER WAS AN OFFICER OF BMI CONCESSIONS, LLC, RESPONSIBLE FOR THE
FILING OF SALES TAX RETURNS FOR SAID BUSINESS, AND AS SUCH AGENT, HE KNOWINGLY CAUSED
TO BE FILED A FRAUDULENT SALES AND USE TAX RETURN FOR SAID MONTH IN THAT HE KNOWINGLY
UNDERSTATED AMOUNTS OF TAXABLE SALES IN LINE 4A OF SAID RETURN AND THE AMOUNT OF TAX
DUE THE STATE OF ILLINOIS EXCEEDS \$300,

in violation of 35 ILCS 120/13(a)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Jody Thwold
Foreman

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY
FILED
SEP 20 2017
CIRCUIT CLERK

MCLEAN

COUNTY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

2017 CF 1025

BILL OF INDICTMENT

COUNT 34 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 19th day of February, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
WIRE FRAUD

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT HE WAS LEGALLY RESPONSIBLE, KNOWINGLY
DEvised A SCHEME TO DEFRAUD BY MEANS OF FALSE REPRESENTATIONS, AND FOR THE PURPOSE OF
EXECUTING SAID SCHEME, TRANSMITTED FROM WITHIN ILLINOIS A WRITING BY MEANS OF WIRE
WHEN HE CAUSED TO BE FILED, VIA ELECTRONIC FILING, A FRAUDULENT STATE OF ILLINOIS
SALES AND USE TAX RETURN FOR JANUARY, 2016 WHICH UNDERSTATED AMOUNTS OF TAXABLE SALES
IN LINE 4A OF SAID RETURN,

- COUNT 34 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 33 -

in violation of 720 ILCS 5/17-24(b)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Jody Thwels
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY
FILED
SEP 20 2017
McLEAN COUNTY
CIRCUIT CLERK

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 35 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 19th day of April, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
FILING A FRAUDULENT SALES AND USE TAX RETURN

IN THAT BMI CONCESSIONS, LLC WAS A LIMITED LIABILITY COMPANY ENGAGED IN THE BUSINESS
OF SELLING TANGIBLE PERSONAL PROPERTY AT RETAIL IN THE STATE OF ILLINOIS DURING THE
MONTH OF MARCH, 2016, HAD ITS PRINCIPLE PLACE OF BUSINESS IN MCLEAN COUNTY, ILLINOIS,
JOHN BUTLER WAS AN OFFICER OF BMI CONCESSIONS, LLC, RESPONSIBLE FOR THE FILING OF
SALES TAX RETURNS FOR SAID BUSINESS, AND AS SUCH AGENT, HE KNOWINGLY CAUSED TO BE
FILED A FRAUDULENT SALES AND USE TAX RETURN FOR SAID MONTH IN THAT HE KNOWINGLY
UNDERSTATED AMOUNTS OF TAXABLE SALES IN LINE 4A OF SAID RETURN AND THE AMOUNT OF TAX
DUE THE STATE OF ILLINOIS EXCEEDS \$300,

in violation of 35 ILCS 120/13(a)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Foreman 

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

FILED

SEP 20 2017

CIRCUIT CLERK

McLEAN

COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 36 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 19th day of April, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
WIRE FRAUD

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT HE WAS LEGALLY RESPONSIBLE, KNOWINGLY
DEvised A SCHEME TO DEFRAUD BY MEANS OF FALSE REPRESENTATIONS, AND FOR THE PURPOSE OF
EXECUTING SAID SCHEME, TRANSMITTED FROM WITHIN ILLINOIS A WRITING BY MEANS OF WIRE
WHEN HE CAUSED TO BE FILED, VIA ELECTRONIC FILING, A FRAUDULENT STATE OF ILLINOIS
SALES AND USE TAX RETURN FOR MARCH, 2016 WHICH UNDERSTATED AMOUNTS OF TAXABLE SALES IN
LINE 4A OF SAID RETURN,

COUNT 36 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 35

in violation of 720 ILCS 5/17-24(b)

A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Additional ID

Foreman: Jody Threl

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 37 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 1st day of January, 2013 through the 31st day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
TAX EVASION

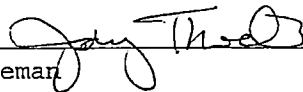
IN THAT HE, OR ONE FOR WHOSE CONDUCT HE WAS LEGALLY RESPONSIBLE, KNOWINGLY ATTEMPTED
TO EVADE THE TAX IMPOSED ON HIM, IN AN AMOUNT EXCEEDING \$10,000, AND HE COMMITTED AN
AFFIRMATIVE ACT IN FURTHERANCE OF THE EVASION IN THAT FALSIFIED INFORMATION
DOCUMENTING THE AMOUNT OF MONEY RECEIVED BY BMI CONCESSIONS, LLC FROM CASH SALES OF
CONCESSIONS WAS ENTERED INTO THE SETTLEMENT WORKSHEETS AT THE CONCLUSION OF EVENTS IN
THE COLISEUM,

in violation of 35 ILCS 120/13(b)(i)

A Class 2 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White


Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

McLEAN

FILED

SEP 20 2017

CIRCUIT CLERK

COUNTY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

2017 CF 1025

BILL OF INDICTMENT

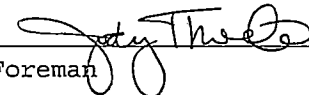
COUNT 38 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 1st day of January, 2013 through the 31st day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
CONSPIRACY TO COMMIT TAX EVASION

IN THAT THE DEFENDANT, WITH THE INTENT THAT THE OFFENSE OF TAX EVASION, EXCEEDING
\$10,000, UNDER 35 ILCS 120/13(B)(I) BE COMMITTED, AGREED WITH ANOTHER PERSON TO THE
COMMISSION OF THAT OFFENSE AND THAT AN ACT IN FURTHERANCE OF THAT CONSPIRACY OCCURRED
WHEN JAY LAESCH FILED A FRAUDULENT SALES AND USE TAX RETURN ON BEHALF OF BMI
CONCESSIONS, LLC,

in violation of 720 ILCS 5/8-2 A Class 3 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White


Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

2017 CF 1025

BILL OF INDICTMENT

COUNT 39 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 4th day of November, 2007 through the 27th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN FINANCIAL TRANSACTIONS, WITH VALUE EXCEEDING
\$100,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED FINANCIAL TRANSACTIONS WITH THE INTENT TO PROMOTE THE CARRYING ON OF THAT
THEFT IN THAT A PRICING SCHEME WAS IMPLEMENTED WHICH CREATED SALES OF IMPROPER REDUCED
COST ITEMS AT CONCESSIONS WHEREBY \$151,404.50 IN COMMISSIONS DUE TO THE CITY OF
BLOOMINGTON WERE RETAINED AS PROFIT BY BMI CONCESSIONS,

IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (A)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman Judy Threlk

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK
COPY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 40 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 4th day of November, 2007 through the 27th day of March,
2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN FINANCIAL TRANSACTIONS, WITH VALUE EXCEEDING
\$100,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED FINANCIAL TRANSACTIONS WHICH HE KNEW OR REASONABLY SHOULD HAVE KNOWN WAS
DESIGNED IN WHOLE OR IN PART TO CONCEAL OR DISGUISE THE NATURE, THE LOCATION, OR THE
SOURCE OF THE CRIMINALLY DERIVED PROPERTY IN THAT A PRICING SCHEME WAS IMPLEMENTED
WHICH CREATED SALES OF IMPROPER REDUCED COST ITEMS AT CONCESSIONS WHEREBY \$151,404.50
IN COMMISSIONS DUE TO THE CITY OF BLOOMINGTON WERE RETAINED AS PROFIT BY BMI
CONCESSIONS,

COUNT 40 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 39
IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (B) (I)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman *[Signature]*

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN
FILED
SEP 20 2017
CIRCUIT CLERK
COUNTY

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

2017 CF 1025

BILL OF INDICTMENT

COUNT 41 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 18th day of January, 2013 through the 20th day of March,
2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN FINANCIAL TRANSACTIONS, WITH VALUE EXCEEDING
\$10,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED FINANCIAL TRANSACTIONS WITH THE INTENT TO PROMOTE THE CARRYING ON OF THAT
THEFT IN THAT A FINANCIAL DISPOSITION TITLED "KELLY DISCOUNT" WAS UTILIZED IN THE
SETTLEMENT WORKBOOK AT THE CONCLUSION OF EVENTS AT THE COLISEUM WHICH RESULTED IN
\$34,761.17 IN COMMISSIONS DUE TO THE CITY OF BLOOMINGTON BEING RETAINED AS PROFIT BY
BMI CONCESSIONS,

IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (A)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 2 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Jody Throckmorton
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK
COPY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 42 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 18th day of January, 2013 through the 20th day of March,
2015 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN FINANCIAL TRANSACTIONS, WITH VALUE EXCEEDING
\$10,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED FINANCIAL TRANSACTIONS WHICH HE KNEW OR REASONABLY SHOULD HAVE KNOWN WAS
DESIGNED IN WHOLE OR IN PART TO CONCEAL OR DISGUISE THE NATURE, THE LOCATION, OR THE
SOURCE OF THE CRIMINALLY DERIVED PROPERTY IN THAT A FINANCIAL DISPOSITION TITLED
"KELLY DISCOUNT" WAS UTILIZED IN THE SETTLEMENT WORKBOOK AT THE CONCLUSION OF EVENTS
AT THE COLISEUM WHICH RESULTED IN \$34,761.17 IN COMMISSIONS DUE TO THE CITY OF
BLOOMINGTON BEING RETAINED AS PROFIT BY BMI CONCESSIONS,

COUNT 42 ALLEGES THE SAME CONDUCT ALLEGED IN COUNT 41
IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (B) (I)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 2 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

[Signature]
Foreman

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

FILED
SEP 20 2017
CIRCUIT CLERK
McLEAN COUNTY

The People of the State of Illinois
VS.

2017 CF 1025

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 43 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 11th day of March, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN A FINANCIAL TRANSACTION, WITH VALUE EXCEEDING
\$100,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED A FINANCIAL TRANSACTION WHICH HE KNEW OR REASONABLY SHOULD HAVE KNOWN WAS
DESIGNED IN WHOLE OR IN PART TO CONCEAL OR DISGUISE THE NATURE, THE LOCATION, OR THE
CONTROL OF THE CRIMINALLY DERIVED PROPERTY IN THAT HE CAUSED A \$247,843.42 CHECK FROM
THE CITY OF BLOOMINGTON TO BE DEPOSITED INTO THE COLISEUM FUND BANK ACCOUNT, OF WHICH,
\$142,887.29 WAS SUBSEQUENTLY TRANSFERRED TO THE PERSONAL BANK ACCOUNTS OF JOHN BUTLER,

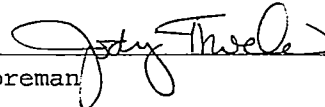
IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (B) (I)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman 

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

2017 CF 1025

The People of the State of Illinois
VS.

DEFENDANT:
JOHN Y BUTLER
101 S MADISON STR
BLOOMINGTON, IL 61701

BILL OF INDICTMENT

COUNT 44 :The GRAND JURY of McLean County, Illinois, charges that
JOHN Y BUTLER on or about the 11th day of March, 2016 at
BLOOMINGTON,
in the County of McLean, State of Illinois, committed the offense of
MONEY LAUNDERING

IN THAT THE DEFENDANT, OR ONE FOR WHOSE CONDUCT THE DEFENDANT WAS LEGALLY RESPONSIBLE,
KNOWING THAT THE PROPERTY INVOLVED IN A FINANCIAL TRANSACTION, WITH VALUE EXCEEDING
\$100,000, REPRESENTED THE PROCEEDS FROM THEFT AND WAS CRIMINALLY DERIVED PROPERTY,
CONDUCTED FINANCIAL A TRANSACTION WHICH HE KNEW OR REASONABLY SHOULD HAVE KNOWN WAS
DESIGNED IN WHOLE OR IN PART TO CONCEAL OR DISGUISE THE NATURE, THE LOCATION, OR THE
CONTROL OF THE CRIMINALLY DERIVED PROPERTY IN THAT HE, AFTER RECEIVING A \$247,843.42
CHECK FROM THE CITY OF BLOOMINGTON, TRANSFERRED \$162,004.72 FROM THE COLISEUM FUND
BANK ACCOUNT TO THE CIAM SAVINGS ACCOUNT, OF WHICH, \$142,887.29 WAS SUBSEQUENTLY
TRANSFERRED TO THE PERSONAL BANK ACCOUNTS OF JOHN BUTLER,

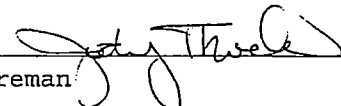
IN VIOLATION OF 720 ILCS 5/29B-1(A) (1) (B) (I)

in violation of 720 ILCS 5/29B-1(a) (1)

A Class 1 Felony

A TRUE BILL

DESCRIPTION		
D.O.B.	SEX	RACE
08/28/1959	Male	White

Foreman 

Additional ID

LIST OF WITNESSES

Intake Report#: 20174314



Report Number: 1613024

Agency: Illinois State Police

COPY

McLEAN COUNTY
FILED
SEP 20 2017
CIRCUIT CLERK

IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.)
JOHN Y. BUTLER)
Defendant.)

No. 2017-CF-1025

SUBPOENA

To: Leslie Johnson
150 North Michigan Avenue
Chicago IL 60601

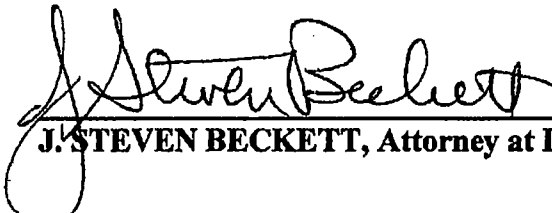
McLEAN COUNTY
FILED
JUL 23 2020
CIRCUIT CLERK

YOU ARE COMMANDED TO APPEAR TO TESTIFY before the Honorable Judge Yoder, in Circuit Courtroom 5C at the McLean Courthouse, 104 W Front St, Bloomington, IL 61701, on August 10, 2020, at 9:00 a.m.
YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this *Subpoena* on behalf of the Circuit Court.

On behalf of the Circuit Court by

Dated: 07/22/2020


J. STEVEN BECKETT, Attorney at Law

Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0151580
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MCLEAN

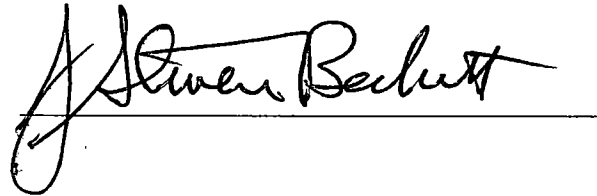
PEOPLE OF THE STATE OF ILLINOIS,)
)
Plaintiff,)
)
vs.) No. 17-CF-1025
)
JOHN Y. BUTLER,)
)
Defendant.)

CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the undersigned caused service of the foregoing ***Subpoena***, to be made upon the recipient(s) designated below by the following method(s):

VIA ELECTRONIC MAIL: A true and correct copy of the foregoing instrument(s) was transmitted electronically via e-mail to the following recipient(s) on this 23rd day of July, 2020.

Leslie Johnson
ljohnson@salawus.com



Prepared by:
TRISTAN N. BULLINGTON
MEYER CAPEL, P.C.
202 North Center Street, Suite 2
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Facsimile]
TBullington@MeyerCapel.com
ARDC No. 6302971

IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.)
JOHN Y. BUTLER,)
Defendant.)

No. 2017-CF-1025

SUBPOENA

McLEAN COUNTY
FILED
JUL 23 2020
CIRCUIT CLERK

To: Kristi Fairfield
1017 Crooked Stick Ln.
Normal, IL 61761

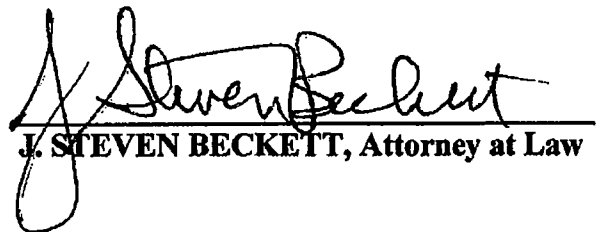
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On behalf of the Circuit Court by

Dated: 07/22/2020


J. STEVEN BECKETT, Attorney at Law

Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0151580
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MCLEAN

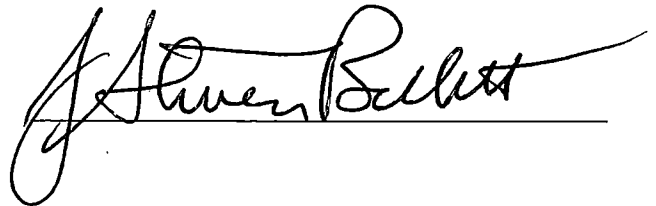
PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.) No. 17-CF-1025
)
 JOHN Y. BUTLER,)
)
 Defendant.)

CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the undersigned caused service of the foregoing *Subpoena*, to be made upon the recipient(s) designated below by the following method(s):

VIA ELECTRONIC MAIL: A true and correct copy of the foregoing instrument(s) was transmitted electronically via e-mail to the following recipient(s) on this 23rd day of July, 2020.

Kristi Fairfield
fairfield95@msn.com



Prepared by:
TRISTAN N. BULLINGTON
MEYER CAPEL, P.C.
202 North Center Street, Suite 2
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Facsimile]
TBullington@MeyerCapel.com
ARDC No. 6302971

IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.)
JOHN Y. BUTLER,)
Defendant.)

No. 2017-CF-1025

SUBPOENA

To: Tim Cassidy
Cassidy & Mueller
416 Main St #323
Peoria, IL 61602

McLEAN COUNTY
FILED
JUL 23 2020
CIRCUIT CLERK

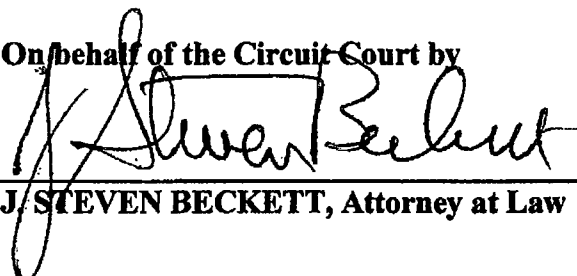
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the State of Illinois, hereby issues this *Subpoena* on behalf of the Circuit Court.

Dated: 07/22/2020

On behalf of the Circuit Court by


J. STEVEN BECKETT, Attorney at Law

Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0151580
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MCLEAN

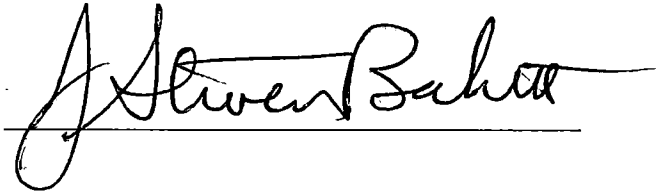
PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.) No. 17-CF-1025
)
 JOHN Y. BUTLER,)
)
 Defendant.)

CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the undersigned caused service of the foregoing *Subpoena*, to be made upon the recipient(s) designated below by the following method(s):

VIA ELECTRONIC MAIL: A true and correct copy of the foregoing instrument(s) was transmitted electronically via e-mail to the following recipient(s) on this 23rd day of July, 2020.

Tim Cassidy
tcassidy@cassidymueller.com



Prepared by:
TRISTAN N. BULLINGTON
MEYER CAPEL, P.C.
202 North Center Street, Suite 2
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Facsimile]
TBullington@MeyerCapel.com
ARDC No. 6302971

IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)

Plaintiff,)

v.)

No. 2017-CF-1025)

JOHN Y. BUTLER,)

Defendant.)

SUBPOENA

To: Allison Ziebarth
19177 North 1500 East Road
Hudson IL 61748

McLEAN COUNTY
FILED
JUL 23 2020
CIRCUIT CLERK

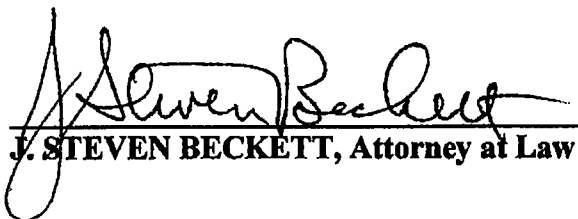
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**YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT
YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.**

**As an officer of the Court, the undersigned attorney at law, who is admitted to practice in
the State of Illinois, hereby issues this *Subpoena* on behalf of the Circuit Court.**

On behalf of the Circuit Court by

Dated: 07/22/2020


J. STEVEN BECKETT, Attorney at Law

Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0151580
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MCLEAN

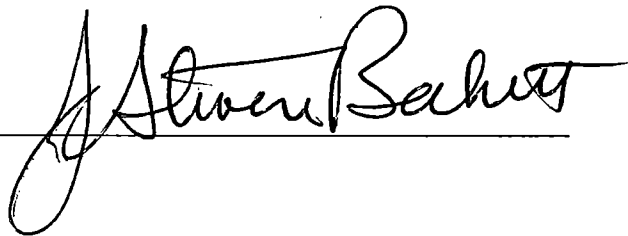
PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.) No. 17-CF-1025
)
 JOHN Y. BUTLER,)
)
 Defendant.)

CERTIFICATE OF SERVICE

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VIA ELECTRONIC MAIL: A true and correct copy of the foregoing instrument(s) was transmitted electronically via e-mail to the following recipient(s) on this 23rd day of July, 2020.

Allison Ziebarth
allison.ziebarth.hs71@statefarm.com



Prepared by:
TRISTAN N. BULLINGTON
MEYER CAPEL, P.C.
202 North Center Street, Suite 2
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Facsimile]
TBullington@MeyerCapel.com
ARDC No. 6302971

State of Illinois
ELEVENTH JUDICIAL CIRCUIT COURT
McLean County, IL

State of Illinois

Case 17 CF 1025

V

JOHN BUTLER

Media Coordinator's Notice of Request for Extended Media Coverage of Trial or Proceedings
COMES NOW the undersigned Media Coordinator, who states as follows:

1. Certain representatives of the news media want to use:
 photographic equipment television cameras electronic sound recording equipment in
courtroom coverage of the above proceeding. (Check the appropriate type(s) of equipment
requested.)

2. The trial or proceeding to be covered by extended media techniques is scheduled on **Aug. 10, 2020**
This request includes all subsequent court proceedings in this matter. **TRIAL**

3. This request for extended media coverage is described as follows (e.g. the number of Photographers
with still cameras):

Photographer video camera sound recording equipment

4. This notice for extended media coverage is filed (check appropriate box):

at least 14 days in advance of the proceeding for which extended media coverage is requested
Or

this notice cannot be filed within 14 days of the proceedings because:

5. A copy of this notice is being provided to all counsel of record, parties appearing without
Counsel, the circuit court, the circuit court administrator for the judicial court, and the judicial officer
expected to preside at the trial or proceeding for which extended media coverage has been requested
as follows:

Attorneys: **STEVE BELKETT**
Defendants: **JOHN BUTLER**
State: State's Attorney Don Knapp
Trial Court Administrator: William Scanlon
Presiding Judge: **YODER**

I will abide by all the provisions of the Policy for Extended Media Coverage in Circuit Courts of Illinois
and the 11th Judicial Circuit Policy for Extended Media Coverage and perform all duties as required by
me as the Media Coordinator.


Media Coordinator

McLEAN COUNTY
FILED
JUL 16 2020
CIRCUIT CLERK

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 McLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA

TO: Jay D. Reece, 404 North Hersey Road, Suite C, Bloomington, IL 61704

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this subpoena on behalf of the Circuit Court under lawful authority of Section 2-1101 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1101.

Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

NOTICE TO WITNESS: The attorney who issued this subpoena is identified in this document. Please refer questions about your knowledge of the subject matter or testimony to the attorney (or to your attorney).
DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 McLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA

TO: Nathan B. Hinch, 404 North Hersey Road, Suite C, Bloomington, IL 61704

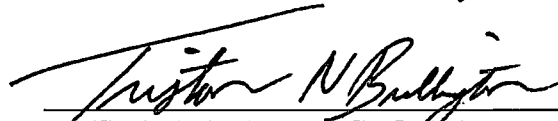
YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

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Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

NOTICE TO WITNESS: The attorney who issued this subpoena is identified in this document. Please refer questions about your knowledge of the subject matter or testimony to the attorney (or to your attorney).
DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 McLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA


TO: David Hales, 1007 Neufairfield Drive, Joliet, IL 60432

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

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Dated: July 13, 2020

On behalf of the Circuit Court by

 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

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STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 MCLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA

TO: Barb Adkins, 44 Parkshores Drive, Bloomington, IL 61701

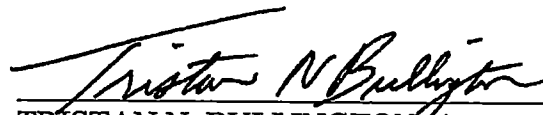
YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this subpoena on behalf of the Circuit Court under lawful authority of Section 2-1101 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1101.

Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

NOTICE TO WITNESS: The attorney who issued this subpoena is identified in this document. Please refer questions about your knowledge of the subject matter or testimony to the attorney (or to your attorney).
DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 CIRCUIT CLERK

McLEAN COUNTY

SUBPOENA

TO: Traci Andracke, 902 Witten Woods Drive, Bloomington, IL 61704

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

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Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

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DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 McLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA

TO: Tammy Hansen, 107 Sandra Court, Normal, IL 61761

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this subpoena on behalf of the Circuit Court under lawful authority of Section 2-1101 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1101.

Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

NOTICE TO WITNESS: The attorney who issued this subpoena is identified in this document. Please refer questions about your knowledge of the subject matter or testimony to the attorney (or to your attorney).
DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 MCLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA

TO: Valerie Smith, 609 Washington Street, Minonk, IL 61760

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

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Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
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DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

FILED
 JUL 15 2020
 MCLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA

TO: Laura Jonen, 9335 Hilltop Lane, Bloomington, IL 61705

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this subpoena on behalf of the Circuit Court under lawful authority of Section 2-1101 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1101.

Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

NOTICE TO WITNESS: The attorney who issued this subpoena is identified in this document. Please refer questions about your knowledge of the subject matter or testimony to the attorney (or to your attorney).
DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.)
)
 JOHN Y. BUTLER,)
)
 Defendant.)

No. 17-CF-1025

McLEAN COUNTY

FILED
 JUL 15 2020
 CIRCUIT CLERK

SUBPOENA

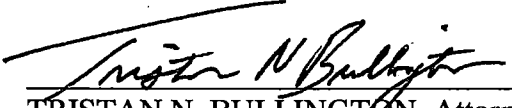
TO: William A. Mueller, Jr., 404 North Hersey Road, Suite C, Bloomington, IL 61704

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this subpoena on behalf of the Circuit Court under lawful authority of Section 2-1101 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1101.

Dated: July 13, 2020

On behalf of the Circuit Court by

 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

NOTICE TO WITNESS: The attorney who issued this subpoena is identified in this document. Please refer questions about your knowledge of the subject matter or testimony to the attorney (or to your attorney).
DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
 IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
 COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Plaintiff,)
)
 vs.) No. 17-CF-1025
)
 JOHN Y. BUTLER,)
)
 Defendant.)

FILED
 JUL 15 2020
 MCLEAN COUNTY
 CIRCUIT CLERK

SUBPOENA

TO: Anthony L. Matens, 55 Wax Myrtle Court, Hilton Head, SC 29926

YOU ARE HEREBY COMMANDED personally to be and appear before the Circuit Court identified above at the date, time, and location specified below to testify truthfully as a witness for the Defendant in the above-captioned case now pending before the Circuit Court.

<u>Date:</u>	August 10-28, 2020
<u>Time:</u>	9:00 A.M.
<u>Judge:</u>	The Honorable Judge William Yoder (or such other judge substituting in the stead of the foregoing judge)
<u>Courtroom:</u>	Room 503 (or such other courtroom as is designated by courthouse personnel on the hearing date)
<u>Location:</u>	McLean County Law & Justice Center 104 West Front Street Bloomington, Illinois

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this subpoena on behalf of the Circuit Court under lawful authority of Section 2-1101 of the Illinois Code of Civil Procedure, 735 ILCS 5/2-1101.

Dated: July 13, 2020

On behalf of the Circuit Court by


 TRISTAN N. BULLINGTON, Attorney at Law

Prepared by:
 TRISTAN N. BULLINGTON
 MEYER CAPEL, P.C.
 202 North Center Street, Suite 2
 Bloomington, IL 61701
 (309) 829-9486 [Voice]
 (309) 827-8139 [Facsimile]
 TBullington@MeyerCapel.com
 ARDC No. 6302971

NOTICE TO WITNESS: The attorney who issued this subpoena is identified in this document. Please refer questions about your knowledge of the subject matter or testimony to the attorney (or to your attorney).
DO NOT CALL THE COURT CLERK.

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MCLEAN

PEOPLE OF THE STATE OF ILLINOIS,)
)
Plaintiff,)
)
vs.)
)
JOHN Y. BUTLER,)
)
Defendant.)

No. 17-CF-1025

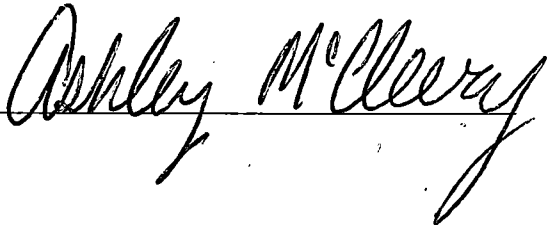
McLEAN COUNTY
FILED
JUL 15 2020
CIRCUIT CLERK

CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the undersigned caused service of the foregoing *Subpoena*, to be made upon the recipient(s) designated below by the following method(s):

VIA U.S. POSTAL SERVICE: A true and correct copy of the foregoing instrument(s) was placed in an envelope bearing both full postage prepaid and the proper address of the following recipient(s), and deposited in the United States mail in Bloomington-Normal, Illinois, on the 14th day of July, 2020.

Anthony L. Matens
55 Wax Myrtle Court
Hilton Head, SC 29926



Prepared by:
TRISTAN N. BULLINGTON
MEYER CAPEL, P.C.
202 North Center Street, Suite 2
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Facsimile]
TBullington@MeyerCapel.com
ARDC No. 6302971

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

JUN 23 2020

CIRCUIT CLERK

COUNTY

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: PAULETTE MARIE HURD

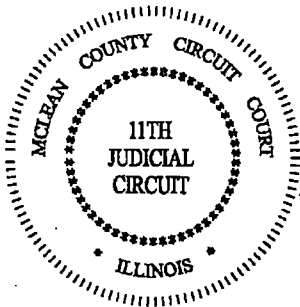
3201 CIRA DR STE 200 BLOOMINGTON, IL 61704

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



649860

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

VS

JOHN YALE BUTLER

Case Number: 2017CF001025

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -HURD, PAULETTE MARIE
COURT PAPER STATUS: Completed

Individual Summary: HURD, PAULETTE MARIE - DOB: 05/31/1973 RACE: White

SEX: Female

Individual Return / Service Status: Served

Personal Served this writ this 19 day of June, 2020,
by serving it to the within named HURD, PAULETTE - 05/31/1973

Served Sex: F Served Race: W Served DOB: 05-31-1973

Comment: Served @ 3201 Cira Drive Ste 200 Bloomington IL

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

8 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 4.00 By MCSP DEPUTY ROBERT FREYMANN - ID # 9215

Return \$ 14.00

TOTAL \$ 68.00

ATTACHMENTS:

VW1



649860

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

FILED

JUN 16 2020

CIRCUIT CLERK

McLEAN

COUNTY

SUBPOENA

TO: PAUL EUGENE GRAZAR

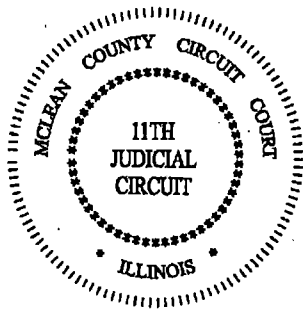
1438 E COLLEGE AVE APT 2 NORMAL, IL 61761

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



649856

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -GRAZAR, PAUL EUGENE
COURT PAPER STATUS: Completed

Individual Summary: GRAZAR JR, PAUL EUGENE - DOB: 07/13/1967 RACE: White

SEX: Male

Individual Return / Service Status: Served

Personal Served this writ this 10 day of June, 2020,
by serving it to the within named GRAZAR, PAUL - 07/13/1967

Served Sex: M Served Race: W Served DOB: 07-13-1967

Comment: Served at 1438 e. College Ave. Apt. 2, Normal, IL

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY ROBERT FREYMANN - ID # 9215

Return \$ 14.00

TOTAL \$ 67.00 *RF*

ATTACHMENTS:

VW1



649856

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

FILED

JUN 09 2020

CIRCUIT CLERK

McLEAN

COUNTY

SUBPOENA

TO: LAURA L JONEN

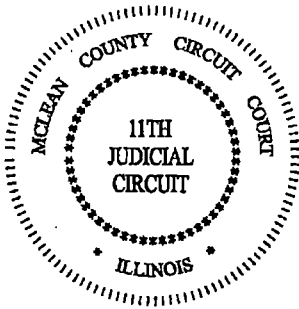
9335 HILLTOP LAN BLOOMINGTON, IL 61704

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



649867

URT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -JONEN, LAURA L
COURT PAPER STATUS: Completed

Individual Summary: JONEN, LAURA L - DOB: 06/29/1957 RACE: White SEX: Female
Individual Return / Service Status: Served

Personal Served this writ this 06 day of June, 2020,
by serving it to the within named JONEN, LAURA - 06/29/1957

Served Sex: F Served Race: W Served DOB: 06-29-1957

Comment: Served at 9335 Hilltop Lane, Bloomington, IL
Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY ANDREW ERICKSON - ID # 13213

Return \$ 14.00

TOTAL \$ 67.00

ATTACHMENTS:

VW1



649867

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

JUN 02 2020

CIRCUIT CLERK

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

MCLEAN

SUBPOENA

TO: JAY C LAESCH

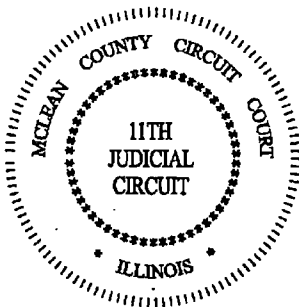
611 WINDSOR WAY HEYWORTH, IL 61745

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



649855

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

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THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -LAESCH, JAY C\
COURT PAPER STATUS: Completed

Individual Summary: LAESCH, JAY C - DOB: 02/28/1980 RACE: White SEX: Male
Individual Return / Service Status: Served

Personal Served this writ this 01 day of June, 2020,
by serving it to the within named LAESCH, JAY - 02/28/1980

Served Sex: M Served Race: W Served DOB: 02-28-1980

Comment: Served at McLean County Sheriff's Office, 104 W. Front, Bloomington, IL
Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

24 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 12.00 By MCSP SERGEANT MATTHEW LANE - ID # 9070

Return \$ 14.00

TOTAL \$ 76.00

ATTACHMENTS:

VW1



649855

20
Keep

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

McLEAN

FILED

MAY 27 2020

CIRCUIT CLERK

COUNTY

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: VALERIE A SMITH

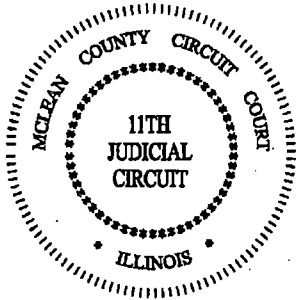
609 WASHINGTON STR MINONK, IL 61760

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

SHERIFF'S FEES

Service and Return \$ 25.

Miles 28.50

TOTAL..... \$ 53.50 *(Handwritten initials)*

SHERIFF OF WOODFORD COUNTY

RECEIVED

MAY 26 2020

I certify that I served this summons on defendants as follows:
(check the appropriate box, and complete information below)

McLean County
State's Attorney's Office

A. (Individual Defendants-personal):
By leaving a copy and a copy of the complaint with each
Individual defendant personally.

B. (Individual Defendant Abode):
By leaving a copy and a copy of the complaint at the usual place of abode of the age
of 13 years or upwards, informing that person of the contents and also by sending a
copy of the summons in a sealed envelope with postage fully prepaid addressed to
each individual defendant at his usual place of abode.

C. (Corporation Defendants):
By leaving a copy and a copy of the complaint with the registered agent, officer
or agent of each defendant corporation.

DEFENDANT John Butler DEFENDANT _____

PERSON TO BE SERVED: Valerie Smith PERSON TO BE SERVED: _____

GIVEN TO: Valerie Smith GIVEN TO: _____

SEX F RACE w APROX.AGE 58 SEX _____ RACE _____ APROX.AGE _____

PLACE OF SERVICE 609 Washington St. PLACE OF SERVICE _____

Minonk

DATE SERVED 5/20/20 TIME 6:30pm DATE SERVED _____ TIME _____

DATE OF MAILING ABODE _____ DATE OF MAILING ABODE _____

_____, SHERIFF OF WOODFORD COUNTY:

(Signature) 879 DEPUTY

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

MAY 26 2020

CIRCUIT CLERK

MCLEAN

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: MICHAEL R NELSON

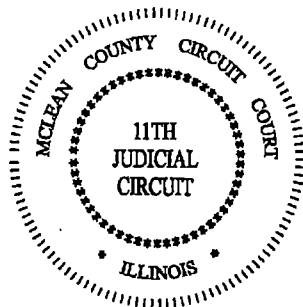
109 E MARKET STR BLOOMINGTON, IL 61701

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office **IMMEDIATELY** upon receiving this subpoena. This subpoena is good for the whole week. This telephone call **MAY PREVENT UNNECESSARY TRIPS TO COURT**. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

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THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -NELSON, MICHAEL R
COURT PAPER STATUS: Completed

Individual Summary: NELSON, MICHAEL R - DOB: RACE: White SEX: Male
Individual Return / Service Status: Served

Personal Served this writ this 26 day of May, 2020,
by serving it to the within named NELSON, MICHAEL -

Served Sex: Served Race: Served DOB:

Comment: Served at McLean County Sheriff's Office, 104 W. Front, Bloomington, IL
Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$.00 By MCSP SERGEANT CHAD WITKOWSKI - ID # 11256

Return \$ 14.00

TOTAL \$ 64.00

ATTACHMENTS:

VW1



649864

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

FILED
MAY 19 2020
MCLEAN COUNTY
CIRCUIT CLERK

SUBPOENA

TO: TAMMY M HANSEN

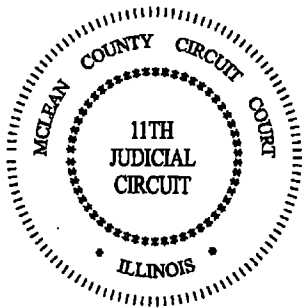
107 SANDRA CRT NORMAL, IL 61761

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

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Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS
VS
JOHN YALE BUTLER

Case Number: 2017CF001025

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -HANSEN, TAMMY M
COURT PAPER STATUS: Completed

Individual Summary: HANSEN, TAMMY M - DOB: 02/08/1964 RACE: White SEX: Female
Individual Return / Service Status: Served

Personal Served this writ this 18 day of May, 2020,
by serving it to the within named HANSEN, TAMMY - 02/08/1964

Served Sex: F Served Race: W Served DOB: 02-08-1964

Comment: Served at 107 Sandra Ct. Normal, IL
Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY SHANE HARBISON - ID # 9396

Return \$ 14.00

TOTAL \$ 67.00

(TMMW)

ATTACHMENTS:
VW1

FILED
MAY 19 2020
MCLENNAN COUNTY
CIRCUIT CLERK



649865

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

MCLEAN COUNTY
FILED
MAY 19 2020
CIRCUIT CLERK

SUBPOENA

TO: TRACI C ANDRACKE

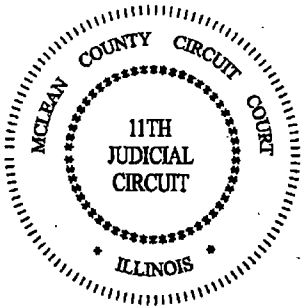
902 WITTEN WOODS DR BLOOMINGTON, IL 61704

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



649861

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

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THE PEOPLE OF THE STATE OF
ILLINOIS
VS
JOHN YALE BUTLER

Case Number: 2017CF001025

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -ANDRACKE, TRACI C
COURT PAPER STATUS: Completed

Individual Summary: ANDRACKE, TRACI C - DOB: 05/05/1978 RACE: White SEX: Female
Individual Return / Service Status: Served

Personal Served this writ this 18 day of May, 2020,
by serving it to the within named ANDRACKE, TRACI - 05/05/1978

Served Sex: F Served Race: W Served DOB: 05-05-1978

Comment: Served at 902 Witten Wood Dr. Bloomington, IL
Service, \$ 50.00
Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY SHANE HARBISON - ID # 9396

Return \$ 14.00

TOTAL \$ 67.00

(Handwritten initials)

ATTACHMENTS:
VW1

FILED
MAY 19 2020
MARLENE
COUNTY
CIRCUIT CLERK



649861

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

MCLEAN COUNTY
FILED
MAY 19 2020
CIRCUIT CLERK

SUBPOENA

TO: PATTI-LYNN SILVA

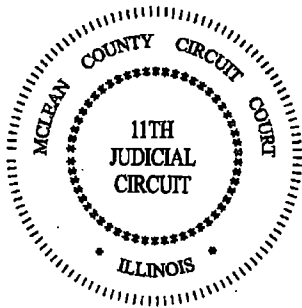
4 WILLOWBEND CRT BLOOMINGTON, IL 61705

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
08/10/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Fourteenth day of May, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS
VS
JOHN YALE BUTLER

Case Number: 2017CF001025

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -SILVA, PATTI-LYNN
COURT PAPER STATUS: Completed

Individual Summary: SILVA, PATTI-LYNN - DOB: 10/27/1968 RACE: White SEX:
Female
Individual Return / Service Status: Served

Personal Served this writ this 18 day of May, 2020,
by serving it to the within named SILVA, PATTI-LYNN - 10/27/1968

Served Sex: F Served Race: W Served DOB: 10-27-1968

Comment: Served at 4 Willowbend Ct. Bloomington, IL
Service, \$ 50.00
Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY SHANE HARBISON - ID # 9396

Return \$ 14.00

TOTAL \$ 67.00

(Signature)

ATTACHMENTS:
VWI

FILED
MAY 19 2020
MCLEAN COUNTY
CIRCUIT CLERK



649862

IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY

McLEAN COUNTY
FILED
APR 02 2020
CIRCUIT CLERK

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
)
v.)
)
JOHN Y. BUTLER)
Defendant.)

No. 2017-CF-1025

MOTION TO RECONSIDER AND INCLUDED MEMORANDUM IN SUPPORT
THEREOF

NOW COMES the Defendant, JOHN Y. BUTLER, by and through his attorneys, J. Steven Beckett of Beckett Law Office, P.C. and Tristan Bullington of Meyer Capel, P.C., and in support of his *Motion to Reconsider* states as follows:

Factual Background

1. On December 30, 2019, the Court made a finding that the Illinois State Police had exceeded the scope of the warrants to search and seize records located at the office of Striegel Knobloch and Defendant's ABC Storage unit.
2. On January 8, 2020, the Court entered an Agreed Order laying out the terms by which the State and Counsel for Defendant would meet in Pontiac, Illinois for the purpose of reviewing all the physical records seized pursuant to the two above-mentioned warrants and having the Defendant remove any out of scope records at his own cost.
3. The State and Counsel for Defendant met at the Illinois State Police headquarters in Pontiac, Illinois on January 29, 2020 and reviewed all records that were seized subject to the two warrants.

4. On January 29, 2020, Counsel for Defendant removed the entirety of the out of scope records that could be located.
5. The State is also in possession of electronically scanned copies of every single document that was seized pursuant to the ABC Storage and Striegel Knobloch warrants. These scans include electronic copies of all of the out of scope documents that were physically removed by Counsel for Defendant from Pontiac on January 29, 2020.
6. On January 30, 2020, Defendant filed a *Motion To Return, Expunge, or Destroy All Electronic Copies of Out of Scope Pontiac Records* asking the Court to order the State to return, expunge, or destroy all electronic copies of the illegally seized, out of scope documents.
7. On March 6, a hearing was held on Defendant's *Motion To Return, Expunge, or Destroy All Electronic Copies of Out of Scope Pontiac Records*. During this March 6th hearing, the State argued, for the first time, that they should be allowed to maintain copies of the illegally seized and out of scope records for use against the co-defendants. The Court denied Defendant's motion and allowed the State to maintain the illegally seized records

Argument

- I. **Regardless of Whether the State Wishes to Use Illegally Obtained Evidence against a Co-Defendant, Defendant has a Right to have all Originals and Copies of His Possessions Returned.**
8. If a motion to suppress illegally seized evidence is granted, "the property shall be restored, unless otherwise subject to lawful detention." *People v. Fratto*, 32 Ill.App.2d 354 (Ill. App. 1961); *People v. Ziomek*, 179 Ill.App.3d 303 (Ill. App. 1989). In Defendant's case, his *Motion to Suppress* was granted insofar as the State was ordered by the Court to return all out of scope documents that were seized pursuant to the ABC Storage and Striegel

Knobloch warrants. Defense Counsel has been unable to locate any authority which dictated that the fruits of an illegal seizure can be lawfully detained for use against other defendants.

9. The issue of needing the material for a co-defendant is a red herring, and is not relevant to whether the material seized outside the scope of the warrant must be returned to Defendant or destroyed.
10. Even if a co-defendant believed the material seized were relevant for their defense, the co-defendant would have the Court's subpoena power available to obtain that material.
11. The government may not retain seized property indefinitely. *People v. McCavitt*, 2019 IL App (3d) 170830 (citing *United States v. Premises Known as 608 Taylor Avenue, Apartment 302, Pittsburgh, Pennsylvania*, 584 F.2d 1297, 1302 (3d Cir. 1978)). The Fourth amendment may be violated when the State fails to quickly return information . . . that is not within the scope of the warrant. *McCavitt*, 2019 IL App (3d) 170830 ¶ 21.
12. There have been several Supreme Court cases which have dealt with this precise issue. In *Silverthorne Lumber Co.*, after federal agents unlawfully seized papers belonging to the Silverthornes and to their lumber company, the documents were returned upon order of the court. In the interim, however, the agents copied the unlawfully seized papers. The agents then tried to use the copied evidence to further their investigation. On those facts, the Court held that the Government is barred from "reaping any fruits from its forbidden act" and further stated that "[t]he essence of a provision forbidding the acquisition of evidence in a certain way is that not merely evidence so acquired shall not be used before the Court but that it shall not be used at all." *Silverthorne Lumber Co., Inc. v. United States*, 251 U.S. 385 (1920). Defendant is entitled to the return or, in the alternative, the destruction of all

electronic and paper copies made of any of his or his companies' documents that were seized outside the scope of the warrants because the State is not lawfully allowed to retain them for use against a co-defendant.

13. A more recent case provides additional guidance on this issue, in *People v. McCavitt*, the Illinois State Police had a valid search warrant to search and seize the hard drive of McCavitt's computer, and during that seizure, police caused that hard drive to be copied. *People v. McCavitt*, 2019 IL App (3d) 170830. McCavitt was charged and acquitted of sexual assault charges based on the evidence found on the copied hard drive. *Id.* at ¶ 5. On the day of his acquittal, McCavitt made an oral request for the return of his property, which was denied with the trial court stating that the property would be returned when things had "cooled down". *Id.* McCavitt filed a written motion for the return of property soon after that the Court never ruled upon. *Id.* The local police department then used the contents of that copied hard drive to charge McCavitt on child pornography charges without procuring an additional warrant. *Id.* ¶ 7. The Illinois Appellate Court ruled that the police were required to examine the contents of McCavitt's mirrored hard drive and *retain only those files that fit within the scope of the warrant.* *Id.* at ¶ 25. McCavitt's conviction was reversed and his case remanded. *Id.*

14. By way of further analysis of how other states deal with the same issue, *McCavitt* cited the following 2016 New York Supreme Court case which stated as follows:

When a warrant is issued which authorizes a search of paper records, the government is entitled to search the files and seize responsive material. They are not permitted to search the files, seize responsive material and then retain files they have never identified as relevant for multiple years, because, at some later time, they might want to search the files again. A search warrant which authorizes a search of voluminous digital records is no different. As Defendant's counsel during an argument pointed out, overseizure is 'a courtesy that was developed for law enforcement.' It is not

a license for the government to retain tens of thousands of a defendant's non-relevant personal communications to review and study at their leisure for years on end.

People v. Thompson, 28 N.Y.S.3d 237, 258-59 (Sup. Ct. 2016).

15. In bringing this motion, Defendant is not attempting to assert vicariously the rights of his co-defendants. Defendant is merely insisting on adherence to the basic principle that victims of unconstitutional practices are entitled to effective remedies. In this case, allowing the State to violate Defendant's constitutional protections against unreasonable search and seizure and then rewarding the State by allowing them to maintain copies of those illegally seized records flies in the face of well-established constitutional laws.
16. Where federally protected rights have been invaded, courts will be alert to adjust their remedies so as to grant the necessary relief. *Bell v. Hood*, 327 U.S. 678, 684 (1946). Because any co-defendant in this case will lack standing to challenge the use of the illegally seized evidence against them, ordering the return and destruction of any copies that the State made of the illegally seized evidence is the necessary remedy to neutralize the prosecutorial reward for violating Defendant's rights. The Supreme Court has stated that "when a court assists the Government in extracting fruits from the victims of its lawless searches, it degrades the integrity of the judicial system. *Gelbard v. United States United States v. Egan*, 408 U.S. 41, 67 (1972).
17. Allowing the State to maintain illegally seized records for use against other co-defendants is rewarding the State for these illegal behaviors. It is this exact behavior that the U.S. Supreme Court has cautioned against many times for more than a century. "The tendency of those who execute the criminal laws to obtain conviction by means of unlawful seizures . . . is not to be sanctioned by the courts which are charged at all times with support of the

Constitution.” *Weeks v. United States*, 232 U.S. 383, 383 (1914). Allowing the State to maintain possession of copies of illegally seized evidence also contradicts established Illinois caselaw, as discussed above in *McCavitt*.

II. If the State is Allowed to Retain Copies of the Illegally Seized Evidence, Defendant has no Guarantees or Protections that this Illegally Seized Evidence will not be Used against Him at a Trial

18. Upon information and belief, the State has not disclosed any of the illegally seized evidence to any co-defendant’s in discovery. The State cannot possibly know if the illegally seized material is relevant evidence against a co-defendant, as the State maintains that they have not reviewed any of the material that was outside the scope of the warrants. For the State’s argument to succeed, the State is placing itself in the position of both using and not using evidence seized outside the scope of a warrant.

19. In prior hearings before this Court, both the State and Special Agent Rossiter have represented to the Court that they have not made use of, or even examined, the out of scope documents that were seized. (See a copy of the transcript for the Motion to Suppress Hearing held on October 25, 2018, attached as Exhibit 1)

a. “21:9-14: Q: What did you do with them once you determined they were outside the scope of the warrant? A: They were set aside. If they were file folders with documents outside the scope inside a box that had documents inside the scope of the warrant they were left in that box and never used.”

b. 21:22-22:1: “Q: If there were documents in those boxes that were from outside the scope of the warrant that was issued, did you utilize those resources or those documents? A: No.”

20. Special Agent Rossiter also testified in later proceedings that he and his team compiled “ISP working boxes” where they would move records that they often referred to in their investigation into the working box from its original box. When Defense counsel presented at Pontiac to retrieve the illegally seized records, Special Agent Rossiter pulled several files that were outside the scope of the warrants, with dates as early as 2008, from the “ISP working boxes.” This definitively shows that the Illinois State Police were examining and making use of illegally seized documents in their investigation. Allowing them to maintain electronic copies of these documents only facilitates a further violation of Defendant’s rights.

21. Furthermore, this Court has held that the illegally seized out of scope documents cannot be used against Defendant. However, if the State is allowed to utilize these documents in the prosecution of the co-defendants and uses said documents to persuade or convince the remaining co-defendant(s) to cooperate and testify against Defendant, then these documents have been used against Defendant.

WHEREFORE the Defendant, JOHN Y. BUTLER, prays that the Court reconsider its March 6, 2020 ruling on Defendant’s *Motion To Return, Expunge, or Destroy All Electronic Copies of Out of Scope Pontiac Records*, and enter an order directing the State to return all electronic copies of the documents listed in Exhibit 1 of Defendant’s *Motion To Return, Expunge, or Destroy All Electronic Copies of Out of Scope Pontiac Records*, or directing the State to expunge or destroy all electronic copies of the documents, and for such other relief deemed just and appropriate

Respectfully Submitted,
JOHN Y. BUTLER, Defendant

By: _____

Tristan N Bullington
TRISTAN BULLINGTON,
one of his attorneys

TRISTAN BULLINGTON
MEYER CAPEL, A Professional Corporation
202 North Center Street,
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Fax]
TBullington@MeyerCapel.com

CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the undersigned caused service of the foregoing *Motion to Reconsider* to be made upon the recipient(s) designated below by the following method(s):

VIA U.S. POSTAL SERVICE: A true and correct copy of the foregoing instrument(s) was placed in an envelope bearing both full postage prepaid and the proper address of the following recipient(s), and deposited in the United States mail in Bloomington-Normal, Illinois, on this 31st day of March, 2020

State's Attorney's Office
McLean County Courthouse
104 West Front Street
Bloomington, IL 61701



TRISTAN BULLINGTON

TRISTAN BULLINGTON
MEYER CAPEL, A Professional Corporation
202 North Center Street,
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Fax]
TBullington@MeyerCapel.com

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

MAR 20 2020

CIRCUIT CLERK

COUNTY

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

MCLEAN COUNTY
SHERIFF'S
OFFICE

20 MAR -5 PM 1:03

RECEIVED

SUBPOENA

TO: DAVID A HALES

1007 NEUFAIRFIELD DR JOLIET, IL 60432

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

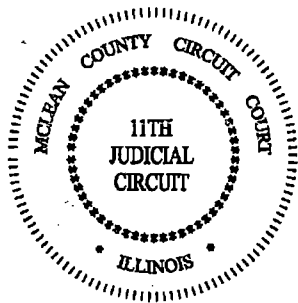
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate

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

ATTACHMENTS:

VW1



Witness, this day: Third day of March , 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



642231

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

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Will County Sheriff's Office | Affidavit of Service

Case Number: 17 CF 1025

Paper Number: 2020-00002558

Attorney: Pro Se

Plaintiff: PEOPLE OF THE STATE OF ILLINOIS

MCLEAN CO STATE'S ATTORNEY

Defendant: JOHN YALE BUTLER

Paper Description

Attempted Services

SUBPOENA 4223
Issued: Tuesday, March 3, 2020
Expires: Monday, April 13, 2020
Payment:

Date: 3/6/2020 Time: 9:35 Deputy and I.D.#: High #1857

Person To Be Served

DAVID A HALES
1007 NEUFARFIELD DR
JOLIET, Illinois 60432

RECEIVED

MAR 11 2020

McLean County
State's Attorney's Office

Special Notes: SHANNY

I certify that I have served the attached Civil Process on the person to be served as follows:

- (A) Personal Service: By leaving a copy of the Summons/Complaint Rule Order Subpoena Notice Judgment Order of Protection Summons/Petition for Order of Protection Citation Civil/Stalking No Contact Order
(B) Substitute Service: By leaving a copy of the Summons/Complaint Citation Notice Judgment Order of Possession at the defendant's usual place of abode...
(C) Service On: Corporation Company Business
(D) Other Service: Certified Mail Posting
(E) The named defendant was not served: Moved No Contact Returned by Attorney Expired Not Listed No Such Address Deceased Other Reason

Person to Serve: David A Hales

Serving Address: 1007 Neufairfield Joliet IL

Process Served On: David A Hales Relationship: Self

Sex: M M/F Race: White Age Range: 64

This 6th day of March 2020 Time: 10:15 hours

Sheriff Mike Kelley by: High I.D. Number: 1857

Remarks:

Entered By: KS Date Entered: Thursday, March 05, 2020 1:29:15PM

Date Printed: Thursday, March 5, 2020 - 1:30 pm

Handwritten signature and initials

**IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY**

PEOPLE OF THE STATE OF ILLINOIS,)
) Plaintiff,)
))
v.))
))
JOHN Y. BUTLER)
) Defendant.)

No. 2017-CF-1025

MOTION TO CONTINUE SUBPOENAS IN FORCE

NOW COMES the Defendant, JOHN Y. BUTLER, by and through his Attorney, J. STEVEN BECKETT, BECKETT LAW OFFICE, and for his Motion to Continue Subpoenas in Force states as follows:

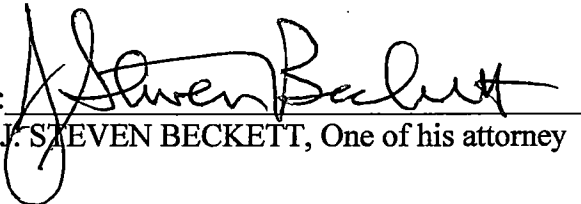
1. This matter was scheduled for trial on April 13, 2020, at 9:00 a.m. in Courtroom 5 before the Honorable William Yoder, Circuit Judge.
2. Both the Plaintiff, People of the State of Illinois and the Defendant, John Butler, had issued and served trial subpoenas for the date and time of the trial.
3. On Friday, March 6, 2020, the Court entered an order continuing the trial at the request of the State, over the objection of the Defendant, to August 10, 2020 at 9:00 a.m. in Courtroom 5.
4. That as a matter of judicial economy, the Court should continue the legal force of said subpoenas to the new trial date of August 10, 2020 at 9:00 a.m.
5. The parties should be directed to notify the trial witnesses who have heretofore been subpoenaed regarding the required appearance time for said witnesses, pursuant to said subpoenas.

FILED
MAR 18 2020
CIRCUIT CLERK
McLEAN COUNTY

6. Any subpoenas that have not been served should be ordered withdrawn and new subpoenas should issue for service for the August trial date.

WHEREFORE the Defendant John Butler prays that the subpoenas issued by the parties and served on the witnesses for the trial date of April 13, 2020, at 9:00 a.m. in Courtroom 5, be continued in force and effect to August 10, 2020, at 9:00 a.m. in Courtroom 5, and for such other relief deemed just and appropriate.

Respectfully submitted
JOHN Y. BUTLER, Defendant,

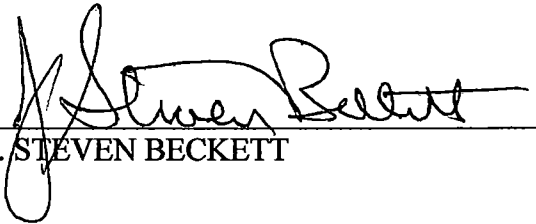
By: 
J. STEVEN BECKETT, One of his attorney

J. STEVEN BECKETT #0151580
BECKETT LAW OFFICE, P.C.
508 South Broadway
Urbana IL 61801
(217) 328-0263
(217) 328-0290 FAX
steve@beckettlawpc.com

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of March, 2020, a copy of the foregoing *Motion to Continue Subpoenas in Force* was served by U.S. Mail to:

State's Attorney's Office
McLean County Courthouse
104 W. Front Street
Bloomington, IL 61701



J. STEVEN BECKETT

J. STEVEN BECKETT #0151580
BECKETT LAW OFFICE, P.C.
508 South Broadway
Urbana IL 61801
(217) 328-0263
(217) 328-0290 FAX
steve@beckettlawpc.com

IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.)
JOHN Y. BUTLER,)
Defendant.)

No. 2017-CF-1025

SUBPOENA

To: Allison Ziebarth
19177 North 1500 East Road
Hudson IL 61748

FILED
MAR 13 2020
CIRCUIT CLERK
MCLEAN COUNTY

**YOU ARE COMMANDED TO APPEAR TO TESTIFY before the Honorable
Judge Yoder, in Circuit Courtroom 5C at the McLean Courthouse, 104 W Front St,
Bloomington, IL 61701, on April 13, 2020, at 9:00 a.m.**

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

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in
the State of Illinois, hereby issues this *Subpoena Duces Tecum* on behalf of the Circuit
Court.

Dated: 03/02/2020

On behalf of the Circuit Court by


J. STEVEN BECKETT, Attorney at Law

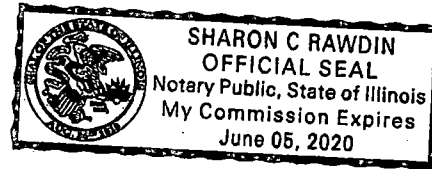
Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0515180
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com

I served the attached **Subpoena** by emailing a copy to Allison Ziebart on March 2, 2020. Witness fees will be tendered at time of testimony.

Steven Becht

SUBSCRIBED and SWORN to before me, a Notary Public, this 5th day of March, 2020.

Sharon C. Rawdin
NOTARY PUBLIC



IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.)
JOHN Y. BUTLER,)
Defendant.)

No. 2017-CF-1025

SUBPOENA

To: Jim Clarahan
8311 Coyote Creek Dr.
Peoria, IL 61607

FILED
MAR 13 2020
CIRCUIT CLERK
COUNTY


**YOU ARE COMMANDED TO APPEAR TO TESTIFY before the Honorable
Judge Yoder, in Circuit Courtroom 5C at the McLean Courthouse, 104 W Front St,
Bloomington, IL 61701, on April 13, 2020, at 9:00 a.m.**

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

**As an officer of the Court, the undersigned attorney at law, who is admitted to practice in
the State of Illinois, hereby issues this *Subpoena Duces Tecum* on behalf of the Circuit
Court.**

Dated: 03/02/2020

On behalf of the Circuit Court by


J: STEVEN BECKETT, Attorney at Law

**Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0515180
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com**

I served the attached **Subpoena** by emailing a copy to Jim Carahan on March 2, 2020. Witness fees will be tendered at time of testimony.

J. Steven Becht

SUBSCRIBED and SWORN to before me, a Notary Public, this 5th day of March, 2020.

Sharon C. Rawdin
NOTARY PUBLIC



IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.)
JOHN Y. BUTLER,)
Defendant.)

No. 2017-CF-1025

SUBPOENA

To: Kristi Fairfield
1017 Crooked Stick Ln.
Normal, IL 61761

FILED
MAR 18 2020
CIRCUIT CLERK
MCLEAN COUNTY


**YOU ARE COMMANDED TO APPEAR TO TESTIFY before the Honorable
Judge Yoder, in Circuit Courtroom 5C at the McLean Courthouse, 104 W Front St,
Bloomington, IL 61701, on April 13, 2020, at 9:00 a.m.**

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

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the State of Illinois, hereby issues this *Subpoena Duces Tecum* on behalf of the Circuit
Court.**

Dated: 03/02/2020

On behalf of the Circuit Court by


J. STEVEN BECKETT, Attorney at Law

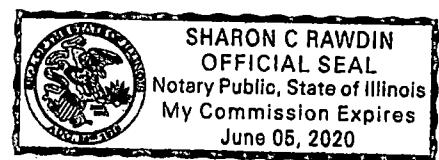
**Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0515180
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com**

I served the attached **Subpoena** by emailing a copy to Kristi Fairfield on March 2, 2020. Witness fees will be tendered at time of testimony.

Sharon C. Rawdin

SUBSCRIBED and SWORN to before me, a Notary Public, this 5th day of March, 2020.

Sharon C. Rawdin
NOTARY PUBLIC



IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.)
JOHN Y. BUTLER,)
Defendant.)

No. 2017-CF-1025

SUBPOENA

To: Tim Cassidy
Cassidy & Mueller
416 Main St #323
Peoria, IL 61602

FILED
MAR 13 2020
CIRCUIT CLERK
COUNTY

YOU ARE COMMANDED TO APPEAR TO TESTIFY before the Honorable
Judge Yoder, in Circuit Courtroom 5C at the McLean Courthouse, 104 W Front St,
Bloomington, IL 61701, on April 13, 2020, at 9:00 a.m.

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

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in
the State of Illinois, hereby issues this *Subpoena Duces Tecum* on behalf of the Circuit
Court.

On behalf of the Circuit Court by

Dated: 03/02/2020


J. STEVEN BECKETT, Attorney at Law

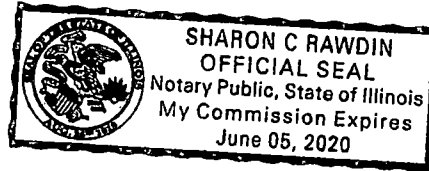
Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0515180
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettlawpc.com

I served the attached **Subpoena** by emailing a copy to Tim Cassidy on March 2, 2020. Witness fees will be tendered at time of testimony.

Sharon C Rawdin

SUBSCRIBED and SWORN to before me, a Notary Public, this 5th day of March, 2020.

Sharon C Rawdin
NOTARY PUBLIC



IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
v.) No. 2017-CF-1025
)
JOHN Y. BUTLER)
Defendant.)

SUBPOENA

To: Leslie Johnson
150 North Michigan Avenue
Chicago IL 60601

FILED
MAR 13 2020
CIRCUIT CLERK
MCLEAN COUNTY

YOU ARE COMMANDED TO APPEAR TO TESTIFY before the Honorable
Judge Yoder, in Circuit Courtroom 5C at the McLean Courthouse, 104 W Front St,
Bloomington, IL 61701, on April 13, 2020, at 9:00 a.m.

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

As an officer of the Court, the undersigned attorney at law, who is admitted to practice in the State of Illinois, hereby issues this *Subpoena Duces Tecum* on behalf of the Circuit Court.

Dated: 03/02/2020

On behalf of the Circuit Court by


J. STEVEN BECKETT, Attorney at Law

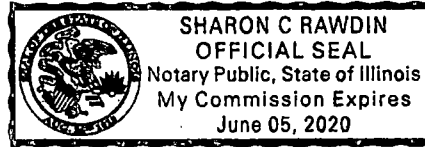
Prepared by:
J. STEVEN BECKETT
BECKETT LAW OFFIC, P.C.
ARDC #: 0515180
508 South Broadway Avenue
Urbana, IL 61801
Office: (217) 328-0263
E-mail: steve@beckettllawpc.com

I served the attached **Subpoena** by emailing a copy to Leslie Johnson on March 2, 2020. Witness fees will be tendered at time of testimony.

J. Steven Beckett

SUBSCRIBED and SWORN to before me, a Notary Public, this 5th day of March, 2020.

Sharon C. Rawdin
NOTARY PUBLIC



IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

McLEAN

FILED

MAR 10 2020

CIRCUIT CLERK

MCLEAN COUNTY

SUBPOENA

TO: MICHAEL R NELSON

109 E MARKET STR BLOOMINGTON, IL 61701

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

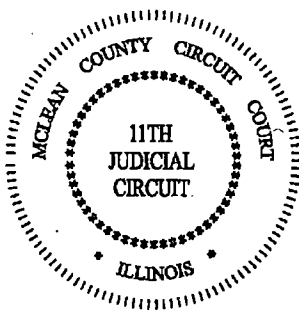
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641638

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -NELSON, MICHAEL R
COURT PAPER STATUS: Completed

Individual Summary: NELSON, MICHAEL R - DOB: RACE: Unknown SEX: Male
Individual Return / Service Status: Return by order of States Attorney

Return by order of States Attorney this writ this 09 day of March, 2020,
by serving it to the within named NELSON, MICHAEL -

Served Sex: Served Race: Served DOB:

Comment: Return Per State's Attorney's Office.

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

2 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 1.00 By MCSP DEPUTY SHANE HARBISON - ID # 9396

Return \$ 14.00

TOTAL \$ 65.00

ATTACHMENTS:

VW1



641638

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

McLEAN

FILED

MAR 09 2020

CIRCUIT CLERK

McLEAN
COUNTY

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: PAUL EUGENE GRAZAR

1438 E COLLEGE AVE APT 2 NORMAL, IL 61761

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

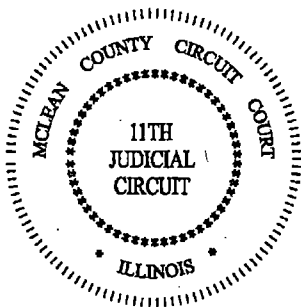
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February , 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641631

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -GRAZAR, PAUL EUGENE
COURT PAPER STATUS: Completed

Individual Summary: GRAZAR JR, PAUL EUGENE - DOB: 07/13/1967 RACE: White

SEX: Male

Individual Return / Service Status: Served

Personal Served this writ this 05 day of March, 2020,
by serving it to the within named GRAZAR, PAUL - 07/13/1967

Served Sex: M

Served Race: W

Served DOB: 07-13-1967

Comment: Served at 2105 N. Veterans Pkwy, Bloomington, IL

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY ROBERT FREYMANN - ID # 9215

Return \$ 14.00

TOTAL \$ 67.00

ATTACHMENTS:

VW1



641631

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

MAR 05 2020

CIRCUIT CLERK

MCLEAN

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: JAY C LAESCH

611 WINDSOR WAY HEYWORTH, IL 61745

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

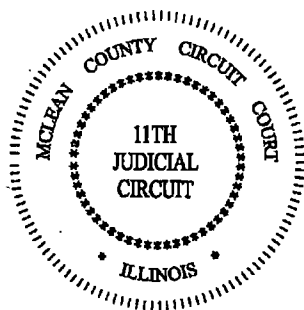
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate.

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February , 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641630

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -LAESCH, JAY C
COURT PAPER STATUS: Completed

Individual Summary: LAESCH, JAY C - DOB: 02/28/1980 RACE: White SEX: Male
Individual Return / Service Status: Served

Personal Served this writ this 04 day of March, 2020,
by serving it to the within named LAESCH, JAY - 02/28/1980

Served Sex: M Served Race: W Served DOB: 02-28-1980

Comment: Served at 611 Windsor Way, Heyworth, IL

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

24 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 12.00 By MCSP DEPUTY EVAN MOSS - ID # 12092

Return \$ 14.00

TOTAL \$ 76.00

ATTACHMENTS:

VW1

(Handwritten initials)



641630

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

MAR 05 2020

CIRCUIT CLERK

MCLEAN

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: TAMMY M HANSEN

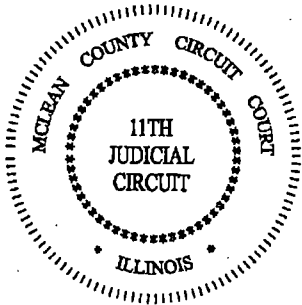
120 W NORTH STR NORMAL, IL 61761

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February, 2020

Don R. Everhart Jr.

Don R. Everhart Jr.
Clerk of the Circuit Court



641639

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -HANSEN, TAMMY M
COURT PAPER STATUS: Completed

Individual Summary: HANSEN, TAMMY M - DOB: 02/08/1964 RACE: White SEX:
Female
Individual Return / Service Status: Served

Personal Served this writ this 02 day of March, 2020,
by serving it to the within named HANSEN, TAMMY - 02/08/1964

Served Sex: F Served Race: W Served DOB: 02-08-1964

Comment: Served at 120 W. North St. Normal, IL
Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY SHANE HARBISON - ID # 9396

Return \$ 14.00

TOTAL \$ 67.00

ATTACHMENTS:

VW1



641639

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

McLEAN

FILE

MAR 05 2020

CIRCUIT CLERK

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: TRACI C ANDRACKE

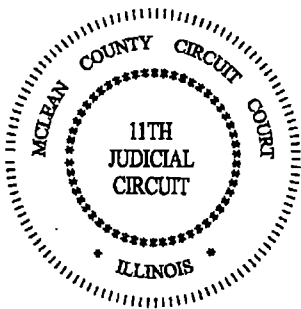
902 WITTEN WOODS DR BLOOMINGTON, IL 61704

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641636

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

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THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -ANDRACKE, TRACI C
COURT PAPER STATUS: Completed

Individual Summary: ANDRACKE, TRACI C - DOB: 05/05/1978 RACE: White SEX:
Female

Individual Return / Service Status: Served

Personal Served this writ this 03 day of March, 2020,
by serving it to the within named ANDRACKE, TRACI - 05/05/1978

Served Sex: F Served Race: W Served DOB: 05-05-1978

Comment: Served at 120 W. North, Normal, IL

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY SHANE HARBISON - ID # 9396

Return \$ 14.00

TOTAL \$ 67.00

ATTACHMENTS:

VW1

(Signature)



641636

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

McLEAN

FILED

MAR 05 2020

CIRCUIT CLERK

COUNTY

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: THOMAS A HAMILTON

2709 HAMILTON WAY BLOOMINGTON, IL 61704

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

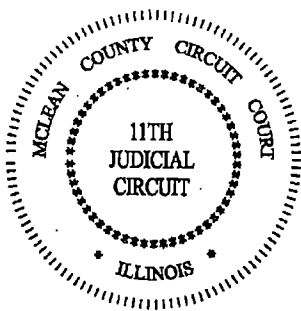
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February , 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641637

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

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THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -HAMILTON, THOMAS A
COURT PAPER STATUS: Completed

Individual Summary: HAMILTON, THOMAS A - DOB: 09/29/1955 RACE: White
SEX: Male
Individual Return / Service Status: Served

Personal Served this writ this 04 day of March, 2020,
by serving it to the within named HAMILTON, THOMAS - 09/29/1955

Served Sex: M Served Race: W Served DOB: 09-29-1955

Comment: Served at 2709 Wellington Way, Bloomington, IL
Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

6 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 3.00 By MCSP DEPUTY ROBERT FREYMANN - ID # 9215

Return \$ 14.00

TOTAL \$ 67.00

ATTACHMENTS:

VW1



641637

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

MAR 05 2020

CIRCUIT CLERK

MCLEAN

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: PAULETTE MARIE HURD

109 E OLIVE STR BLOOMINGTON, IL 61701

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

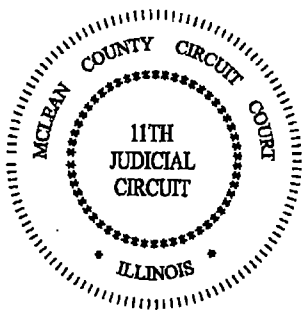
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February , 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641634

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -HURD, PAULETTE MARIE
COURT PAPER STATUS: Completed

Individual Summary: HURD, PAULETTE MARIE - DOB: 05/31/1973 RACE: White

SEX: Female

Individual Return / Service Status: Served

Personal Served this writ this 04 day of March, 2020,
by serving it to the within named HURD, PAULETTE - 05/31/1973

Served Sex: F Served Race: W Served DOB: 05-31-1973

Comment: Served at 3201 Cira Dr. Bloomington, IL

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

12 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 6.00 By MCSP DEPUTY ROBERT FREYMANN - ID # 9215

Return \$ 14.00

TOTAL \$ 70.00

ATTACHMENTS:

① of

VW1



641634

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

McLEAN COUNTY
FILED
MAR 05 2020
CIRCUIT CLERK

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: MICHAEL J COX

1612 WHITMER CRT BLOOMINGTON, IL 61701

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

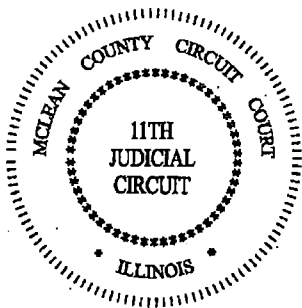
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February , 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641641

URT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS

JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -COX, MICHAEL J
COURT PAPER STATUS: Completed

Individual Summary: COX, MICHAEL J - DOB: 09/21/1956 RACE: White SEX: Male
Individual Return / Service Status: Return by order of States Attorney.

Return by order of States Attorney this writ this 04 day of March, 2020,
by serving it to the within named COX, MICHAEL - 09/21/1956

Served Sex: Served Race: Served DOB:

Comment: Return Per State's Attorney's Office.

Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

10 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 5.00 By MCSP DEPUTY ROBERT FREYMANN - ID # 9215

Return \$ 14.00

TOTAL \$ 69.00 T

ATTACHMENTS:

VW1



641641

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MCLEAN COUNTY

THE PEOPLE OF THE
STATE OF ILLINOIS

Plaintiff

Vs.

JOHN YALE BUTLER

Defendant

MCLEAN

FILED

MAR 05 2020

CIRCUIT CLERK

COUNTY

Case Number: 2017CF001025

Report Number: 1613024

Event Type: Jury Trial

SUBPOENA

TO: LAURA L JONEN

9335 HILLTOP LAN BLOOMINGTON, IL 61704

YOU ARE COMMANDED TO APPEAR TO TESTIFY BEFORE THE CIRCUIT COURT OF
MCLEAN COUNTY IN THE ABOVE ENTITLED CASE AT LAW AND JUSTICE CENTER, 104 W.
FRONT STREET, BLOOMINGTON, ILLINOIS 61701 BEFORE JUDGE WILLIAM YODER ON
04/13/2020 AT 09:00 AM ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS.

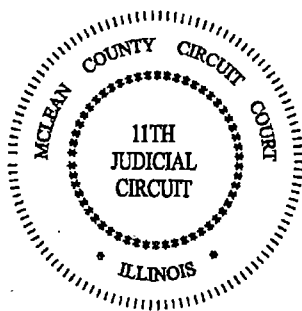
YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING :

This subpoena is good from 4/13-4/30. I will let you know when you will be needed closer to the courtdate

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

ATTACHMENTS:

VW1



Witness, this day: Twenty-First day of February, 2020

Don R. Everhart Jr

Don R. Everhart Jr
Clerk of the Circuit Court



641642

COURT PAPER ATTACHMENTS

VW1 State Attorney Contact Info -- Victim Witness

IMPORTANT

Contact the McLean County State's Attorney's Office IMMEDIATELY upon receiving this subpoena. This subpoena is good for the whole week. This telephone call MAY PREVENT UNNECESSARY TRIPS TO COURT. Please call the Director in Victim Witness at 309-888-5424.

Please refer to the case number at the top, right hand corner of the subpoena.

Monday - Friday
8:30 AM - 4:30 PM

Access to the courts is available to all persons in McLean County. If you are a victim or witness with a disability and are in need of accommodation, please call the Victim/Witness Service at (309) 888-5424 no later than seven (7) days prior to your subpoena date. Please have your case number, court date and what accommodation you are requesting available when you call.

THE PEOPLE OF THE STATE OF
ILLINOIS

Case Number: 2017CF001025

VS
JOHN YALE BUTLER

COURT PAPER TYPE : Subpoena
COURT PAPER SUMMARY: -JONEN, LAURA L
COURT PAPER STATUS: Completed

Individual Summary: JONEN, LAURA L - DOB: 06/29/1957 RACE: White SEX:
Female
Individual Return / Service Status: Served

Personal Served this writ this 02 day of March, 2020,
by serving it to the within named JONEN, LAURA - 06/29/1957

Served Sex: F Served Race: W Served DOB: 06-29-1957

Comment: Served at 9335 Hilltop Lane, Bloomington, IL
Service, \$ 50.00

Miscellaneous Fees:

_____ SHERIFF

12 miles necessary travel from Law and Justice Center to place of service
of within named person and return,

\$.50 per mile \$ 6.00 By MCSP DEPUTY BEN ZEHR - ID # 13623

Return \$ 14.00

TOTAL \$ 70.00

ATTACHMENTS:

VW1

(T) JB



641642

IN THE CIRCUIT COURT FOR THE
ELEVENTH JUDICIAL CIRCUIT OF ILLINOIS
MCLEAN COUNTY

FILED
MAR 05 2020
CIRCUIT CLERK
MCLEAN COUNTY

PEOPLE OF THE STATE OF ILLINOIS,)
Plaintiff,)
)
v.)
)
JOHN Y. BUTLER)
Defendant.)

No. 2017-CF-1025

**DEFENDANT'S RESPONSE TO STATE'S
MOTION FOR DISCOVERY SANCTIONS**

NOW COMES the Defendant, JOHN Y. BUTLER, by and through his attorneys, J. Steven Beckett of Beckett Law Office, P.C. and Tristan Bullington of Meyer Capel, P.C., and in support of his *Response to State's Motion for Discovery Sanctions* states as follows:

Procedural Background

1. On December 21 and 22, 2016, the Illinois State Police ("ISP") executed two search warrants on Striegel Knobloch and Defendant's ABC Storage unit, removing more than 61 boxes of Defendant's business records.
2. Defendant and his counsel attempted to coordinate a review the Defendant's own records stored at Pontiac on May 9 and 10, 2018. On the night of May 8, 2018, Defense counsel was informed by the ISP that Defendant was not allowed access to the records and the visit was cancelled.
3. On May 16, 2018, Defendant filed a Motion to Compel the State to allow Defendant access to the records that they seized on December 21 and 22, 2016.
4. On October 11, 2018, Defendant filed his Motion to Suppress, arguing that the Illinois State Police ("ISP") Search Warrant for Defendant's ABC Storage unit was a general warrant and that it must be suppressed and all of the seized records must be returned.

5. On October 24, 2018, a hearing on Defendant's Motion to Suppress was held.
6. On October 30, 2018, Defendant filed his Argument on Defendant's Motion to Suppress.
7. On November 15, 2018, Defendant filed his Motion to Reopen Suppression Hearing Proofs.
8. On December 20, 2018, the State was informally ordered by the Court to produce scanned, electronic copies of the records that were seized pursuant to the ABC Storage Search Warrant.
9. It was not until approximately May 29, 2019 that the State produced a completed inventory of the contents of the boxes that ISP seized pursuant to the ABC Storage Search Warrant.
10. On December 30, 2019, the Court denied Defendant's Motion to Suppress and Supplemental Motion to Suppress, but ruled that any evidence seized outside the scope of the warrant could not be used by the State.
11. On January 8, 2020, after Defendant objected to the State's continued possession of documents that were seized outside the scope of the warrant, the Court entered an agreed order allowing Defense Counsel to, at Defendant's cost, remove any and all out of scope documents seized pursuant to the ABC Storage Search Warrant and the Striegel Knobloch Warrant from the State's possession.
12. On January 29, 2020, Defense Counsel met with representatives from the ISP, the Illinois Department of Revenue, and the State's Attorney's Office at the Headquarters in Pontiac, Illinois. On this date, Defense Counsel was finally allowed to remove thousands of out of scope records from the State's possession.

Defendant's February 28, 2020 Second Supplemental Discovery Response

13. The State argues that Defendant did not provide information regarding the statements made by the witnesses disclosed in his response, nor did Defendant state with specificity each witness's last known address.
14. After the filing of the State's Motion, Defendant provided the last known address of each of the opinion and reputation witnesses.
15. The failure to provide the last known address of each witness was an oversight that Defense corrected once brought to his attention.

Subpoena *Duces Tecum* Compliance

16. As stated in the State's Motion, multiple subpoena *duces tecum* were issued by the grand jury on December 21, 2016 compelling the production of documents from CIAM and BMI Concessions.
17. The State neglects to bring to the Court's attention the fact that Defendant was unable to produce those documents in response to the subpoena *duces tecum* because on December 21, 2016 and December 22, 2016, the ISP executed search warrants on Striegel Knobloch and Defendant's ABC Storage unit, respectively. During the execution of these warrants, over 61 boxes of Defendant's business records – including those which were responsive to the subpoenas *duces tecum*– were seized.
18. The ISP maintained possession of these documents until Defense Counsel, at Defendant's own expense, and pursuant to a Court Order, traveled to Pontiac, Illinois and personally sorted through and retrieved the out of scope documents on January 29, 2020.
19. The State now questions Defendant's compliance with the 2016 subpoenas. The State, with apparent total sincerity, appears to be questioning whether Defendant complied with

the subpoenas issued on December 21, 2016 because he failed to tender the documents that the ISP seized on December 21 and 22, 2016.

20. To this facetious argument, Defendant can only assure the Court that any records that he could have tendered would have been tendered pursuant to the 2016 subpoenas. Records that have not been in his possession since the early hours of December 22, 2016 would not have been tendered pursuant to the 2016 subpoenas.
21. To address the State's unfounded accusation that Defendant did not comply with the 2016 subpoenas because Defense Counsel informed them on February 28, 2020 that Bill Mueller was still searching through boxes, Defendant would remind the State that on December 21, 2016, Bill Mueller was Defendant's attorney. The documents that Bill Mueller seeks currently are documents which are not responsive to the subpoena *duces tecum* and instead are supportive to other defenses Defendant may raise at trial, including Advice of Counsel. Any documents to that effect would have been protected from disclosure under the 2016 subpoenas by attorney-client privilege. It is only now to support an Advice of Counsel defense that Defendant is choosing to waive that privilege.
22. Furthermore, this is the first time since December 21, 2016 that the State has taken any affirmative steps to enforce these subpoenas or expressed any concerns regarding Defendant's compliance.

Discovery Compliance

23. The State argues that they have complied with the court rulings and worked to provide all materials to Defendant. It should be noted that the State does not represent to the Court that they *timely* provided all materials to Defendant. Because they did not.

24. On December 22, 2016, Defendant's then-counsel informed the State that the ISP had seized multitudinous records beyond the scope of their warrants and demanded their return. Since then, Defendant has worked diligently to seek the return of those documents. It was not until January 29, 2020 – three years, one month, and eight days after the first demand for their return – that the ISP finally released the out of scope documents that were seized illegally. Only after a Court Order compelling them to do so. (Attached hereto is Exhibit 1, email correspondence from Bill Mueller, dated December 22, 2016)
25. Until January 29, 2020, Defendant was unable to properly prepare for trial due to the lack of access to his own documents because of the actions of the State. Without being able to access the illegally seized documents, Defendant has been unable to effectively review his own evidence and formulate his own defense. Defendant has been informing the State of his inability to prepare without the seized documents since as early as May 16, 2018. While Defendant did have scanned copies of these documents at the end of May, 2019, these scans were unorganized, unlabeled, and often times illegible due to scanning errors. Defendant was not able to effectively examine the contents and context of the seized documents through this medium.
26. Without being able to effectively review the documents that were illegally seized, Defendant was unable to determine what witnesses would aid in his defense, what documents would be needed at trial, and what defenses were at his disposal that are supported by the evidence.
27. Furthermore, since at least May 16,, 2018, the State knew the hardship that failing to return the illegally seized records placed on Defendant's ability to prepare his defense. (See Defendant's Motion to Compel State to Allow Unrestricted Defense Inspection of

Defendant's Documents Seized by Illinois State Police, filed May 16, 2018; Defendant's Argument on Defendant's Motion to Suppress, pg. 15; and Transcript of Rossiter Testimony, attached hereto as Exhibit 2, at 17:10-16). The State has been on notice for almost two years that Defendant needed the illegally seized records to effectively prepare his defense, and they still did not return Defendant's records until Defendant physically collected them himself, pursuant to a Court Order.

28. It is now disingenuous of the State to argue that they are prejudiced by the timing of Defendant's disclosure. Defendant made timely disclosure of potential exhibits and potential witnesses within the context of the situation. Less than 30 days after Defendant finally regained possession of his illegally seized documents, he was able to begin to formulate his defense, compile a witness list, and review and tender documents, including documents that the State had illegally prevented Defendant from accessing for three years, one month and eight days.
29. The State's claim that Defendant's disclosure occurred "on the eve of trial" is further disingenuous, as the documents were produced 45 days prior to trial, allowing the State more time to review the documents before trial, than Defendant had before disclosing them to the State. The State had access to a large portion of the tendered documents for three years, one month, and eight days longer than Defendant. If the State is truly prejudiced, that situation is of their own making and at no fault of Defendant. Defendant should not be penalized in the form of barring evidence or a delayed trial because the State failed to timely tender to Defendant evidence that the State was on notice Defendant needed to effectively form a defense and had no legal basis to exert control over.

Discovery Violation

30. Defendant has made all of the timely disclosures that he was able to make without the full scope of his business records available to him until January 29, 2020. He complied with Illinois Supreme Court Rule 415(b) by promptly notifying the State of additional discovery when he was able to, as evidenced by his multiple discovery disclosures.

31. To establish a discovery violation under Illinois Supreme Court Rule 415(g)(i), a party must show that the other “party has failed to comply with an applicable discovery rule or an order issued pursuant thereto.” Ill. R. 415(g)(i); *People v. Kladis*, 403 Ill. App. 3d 99 (Ill. App. 2010). Providing documents to the State at a time that the State finds inconvenient is not a violation, especially given the circumstances of this specific case. This would be the case, even if the inconvenience of the timing were not caused by the State’s own actions. The State has not made the appropriate showing to sustain an accusation of a discovery violation.

32. If any party has violated discovery, the State has impeded Defendant’s investigation of his own case, in violation of Illinois Supreme Court Rule 415(a), which states:

Except as is otherwise provided as to matters not subject to disclosure and protective orders, neither the counsel for the parties nor other prosecution or defense personnel shall advise persons having relevant material or information (except the accused) to refrain from discussing the case with opposing counsel or showing opposing counsel any relevant material, *nor shall they otherwise impede opposing counsel's investigation of the case.*

(Emphasis added) Illinois Supreme Court Rule 415(a)

33. The State knowingly and intentionally denied Defendant access to records that were illegally seized for three years, one month, and eight days. The State knew that the ISP had seized documents outside the scope of the warrant *on the day they were seized* in 2016. However, they continued to exercise illegal control over and prevent Defendant access to these records until they were ordered by the Court to return them. To now claim that having

those documents returned to them, in the form of a discovery disclosure 29 days after they were finally returned to Defendant, is a disingenuous argument, at best.

34. The State should not be allowed to sanctimoniously complain that the discovery that Defendant was finally able to tender after more than three years of waiting is untimely, and then disingenuously argue that the Defendant is at fault for the delay and deserving of sanctions.


35. If not for the State's violation of Illinois Supreme Court Rule 415(a), they would not be in a position to argue any form of violation on the part of Defendant.

36. Defendant is not at fault for the State's inability to review the tendered discovery in the timeframe that they themselves set by denying access to Defendant's own records for more than three years.

37. Defendant objects to resetting the trial date to the August 2020 trial setting. Defendant is ready to proceed with trial on April 13, 2020.

WHEREFORE the Defendant, JOHN Y. BUTLER, prays that the Court deny the State's Motion for Discovery Sanctions, and for such other relief deemed just and appropriate

Respectfully Submitted,
JOHN Y. BUTLER, Defendant

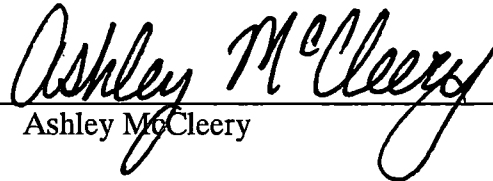
By: 
TRISTAN N. BULLINGTON, one
of his attorneys

TRISTAN N. BULLINGTON
MEYER CAPEL, A Professional Corporation
202 North Center Street,
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Fax]
TBullington@MeyerCapel.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is one of the attorneys for the Defendant in this above-titled cause, and that on March 5, 2020, he did cause a copy of the foregoing *Response to State's Motion for Discovery Sanctions* to be hand delivered to the following:

State's Attorney's Office
McLean County Courthouse
104 West Front Street
Bloomington, IL 61701



Ashley McCleery

TRISTAN BULLINGTON
MEYER CAPEL, A Professional Corporation
202 North Center Street,
Bloomington, IL 61701
(309) 829-9486 [Voice]
(309) 827-8139 [Fax]
TBullington@MeyerCapel.com

From: Bill Mueller
Sent: Thursday, December 22, 2016 11:35 AM
To: Daniel_Rossiter@isp.state.il.us; 'adam.ghrist@mcleancounty.gov'
Subject: CIAM/BMI

Dan and Adam,

I have left messages for both of you and asked that one of you please call me.

Regarding the Search Warrant executed yesterday at Streigels, files were taken that were not covered by the warrant and relate to other Streigel clients. This has caused distress in their office and impaired their work for those clients. We would like to have returned as soon as possible the following:

1. SKCO: Quickbooks companies – log in and password list
2. Coliseum Entertainment and Sports Properties: Quarterly MFUT Tax filings folder
3. Coliseum Entertainment and Sports Properties: Annual Tax Filings Folder
4. Coliseum Entertainment and Sports Properties: Volvo loan payment folder
5. Illinois Pro Sports: Sales Tax filings folder.

Much of this is confidential and proprietary. D. Knobloch does not want to have to inform his clients that their files were mistakenly taken by the ISP.

Second, much of what was taken from the storage shed are records for 2012 and earlier. Those should be returned.

You will probably need passwords to access the laptop taken from Streigels; we are glad to provide those for the CIAM/BMI information.

Lastly, we discussed scheduling a time for you to talk to Kelly the week of January 3rd. Do you want us to still schedule that meeting?

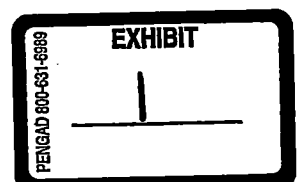
Please let me know about the Streigel items ASAP.

Bill Mueller

William A. Mueller, Jr
Attorney/Of Counsel
Mueller, Reece & Hinch, LLC
Attorneys at Law
404 North Hershey Road, Suite C
Bloomington, Illinois 61704
phone: 309-827-4055
fax 309-829-6742



WE'VE MOVED!!! We are now at 404 North Hershey Road, Bloomington, Illinois 61704 which is just across the street from Heartland Bank and Trust Company between PNC Bank and the Farm Bureau. There is plenty of parking and three designated spots just outside our front door. Our telephone number - 309-827-4055 - remains the same as well as all our email addresses. Please come by and see our new offices.



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IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT

MCLEAN COUNTY, ILLINOIS

PEOPLE OF THE)
STATE OF ILLINOIS)
)
Plaintiff,)
)
vs.)
) NO. 17 CF 1025
JOHN Y. BUTLER,)
)
Defendant.)

HEARING ON MOTIONS

REPORT OF PROCEEDINGS of portions of the hearing
before the Honorable WILLIAM YODER on the **25th day of**
October, 2018.

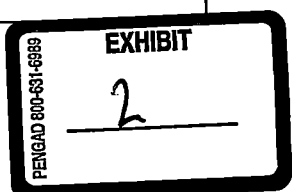
APPEARANCES:

MR. BRADLY RIGDON,
Assistant State's Attorney for McLean County,
for the People of the State of Illinois;

MR. J. STEVEN BECKETT,
MR. SCOTT KORDING,
MS. AUDREY THOMPSON,
Attorneys at Law,
for the Defendant;

Defendant also present.

Nancy L. McClarty, CSR, CP-RPR
CSR License No. 084-002264
Official Court Reporter
McLean County, IL



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I N D E X

<u>WITNESS</u>	<u>Page</u>
D A N I E L R O S S I T E R	
DIRECT EXAMINATION BY MR. BECKETT	5
CROSS EXAMINATION BY MR. RIGDON	19
REDIRECT EXAMINATION BY MR. BECKETT	24

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(Recess.)

THE COURT: Let's go back on the record in 17 CF 1025. While we were off the record I asked the State about People's Exhibit Number One, an exhibit in relation to a community survey report in the Christensen case tendered by the State referenced in the venue motion but not ever admitted.

Mr. Rigdon, would you restate your position?

MR. RIGDON: Yes, Your Honor. It's just been my, I guess my general practice that when I would use an exhibit and reference it on the record, even if it was just for the purposes of impeachment and not for admission, that I would tender it to the court to incorporate as part of the record. Were the court or counsel more comfortable that it not be retained by the court, I wouldn't have objection to that. That was just done based upon my common practice.

THE COURT: Mr. Beckett?

MR. BECKETT: Well, I'm not sure if it was used for impeachment. I thought it was used to refresh recollection and then he then admitted and had his recollection refreshed and agreed with the statements that counsel was making. So I don't really think it's necessary to complete the record in this case; and as I indicated, I actually represent the

1 family of the victim in that case, and I'm a little concerned
2 about having that document in a public record other than in
3 the case that is -- that is pending if it's not necessary.

4 MR. RIGDON: If I could just indicate, I misspoke.
5 It was for purposes of refreshing recollection, not
6 impeachment.

7 THE COURT: Right, so, it was refreshing
8 recollection. It was not admitted. I don't think it needs
9 to be made a part of the court file. Everything that -- the
10 recollection was refreshed. The witness testified consistent
11 with your questions after the refreshing of the recollection.
12 Again, it wasn't admitted, and so it's going to be returned
13 to counsel.

14 Mr. Beckett, what do you want to do on the motion
15 to suppress. You've received the State's --

16 MR. BECKETT: I have and I've reviewed. I am going
17 to want to file a reply, but I would like to present the
18 evidence as long as we're in court here today that's
19 consistent with our motion.

20 THE COURT: I think that's fair. Why don't we
21 proceed with the evidentiary piece. I won't rule today.
22 I'll wait for your reply, and then we'll see where that
23 leaves us. So let's move forward with the motion.

24

1 (Witness sworn/affirmed.)

2
3 D A N I E L R O S S I T E R

4 called as a witness on behalf of the Defendant herein, being
5 first duly sworn or affirmed, was examined and testified as
6 follows:

7
8 DIRECT EXAMINATION BY MR. BECKETT:

9
10 Q Would you please state your name for the record?

11 A Special Agent Daniel Rossiter, R-O-S-S-I-T-E-R.

12 Q Agent Rossiter, you're the agent who had
13 responsibility for the investigation that led to the
14 indictment and charges in John Butler's case. Is that
15 correct?

16 A Yes, sir, I was the lead case agent.

17 Q Right. And you're with the Illinois State Police.
18 Is that correct?

19 A Yes.

20 Q As part of your investigation, you did utilize search
21 warrants. Is that correct?

22 A Yes.

23 MR. BECKETT: May I have continuing permission to
24 approach, Your Honor?

1 THE COURT: Yes, yes.

2 MR. BECKETT:

3 Q I've handed you what's been marked for identification
4 as exhibit one. Do you agree with me that exhibit one is a
5 search warrant for December 22nd, 2016, for ABC Storage,
6 2442 South Main, Bloomington, Illinois, and storage unit 14
7 leased to John Butler?

8 A Yes, sir.

9 Q Okay. I want you to look at the second page. It was
10 presented to Judge Butler at 8:57 a.m. Is that correct?

11 A Yes, sir.

12 Q And the correct date should be December 22nd, right,
13 not December 21st?

14 A Yes, that's correct.

15 Q So that's a scrivener's error, would you agree?

16 A Yes, sir.

17 Q Now, under this warrant, you were commanded to search
18 and seize documents related to Central Illinois Arena
19 Management, business documents, CIAM and BMI Concessions
20 business documents, correct?

21 A Yes, sir.

22 Q And that was for a period from January 1, 2013, to
23 March 31, 2016. Is that correct?

24 A Yes.

1 Q And so would I be correct that any document that was
2 outside the date -- those dates of the parameter would be
3 beyond the scope of the warrant?

4 A Yes, that's correct.

5 Q Did you go to ABC Storage on December 22nd, 2016, at
6 9:38 in the morning?

7 A Yes.

8 Q Did you have others with you?

9 A Yes, there were multiple agents there to assist.

10 Q Okay. How many?

11 A Approximately five to six other agents.

12 Q Okay. Describe the -- the storage facility.

13 A It's an open-air facility, meaning there is a
14 manager's office and then behind that building are storage
15 units established in rows with garage doors that are open to
16 the elements.

17 Q And did you go to unit 14?

18 A Yes.

19 Q Did you have the door opened or open it yourself?

20 A We opened it ourselves with a bolt cutter. The lock
21 on the unit was not from the storage unit.

22 Q Did you find a table inside the unit?

23 A Yes.

24 Q And so how long were you actually at the unit

1 executing the warrant?

2 A I couldn't say exactly how long, long enough to load
3 the boxes out of the unit into various vehicles to transport
4 to a secure facility.

5 Q All right. Is that what you did at the unit, load
6 boxes from the unit into vehicles to take to another
7 location?

8 A Yes.

9 Q And so am I correct that you made no effort to
10 inventory or examine the boxes at the unit?

11 A Well, at first approach of the unit once the doors
12 were open we saw the card table that was positioned directly
13 in front of the door. There were several boxes on that table
14 with various documents that were inside the boxes as well as
15 out. So we made a decision instead of sitting on site at the
16 storage unit to take them back to the secure facility,
17 state-police-secure facility, to go through and determine
18 what documents were inside the scope of the warrant and which
19 ones were not.

20 Q Okay. So the state police facility where you were
21 going to take these documents to review them, was that in
22 Pontiac, Illinois?

23 A No, it was in Bloomington.

24 Q All right. And how long were you at that location

1 with those boxes?

2 A Well, those boxes remained there for a significant
3 period of time.

4 Q What is that? What's a significant period of time?

5 A A good majority of the investigation, six months.

6 Q So, when were they moved from Bloomington to Pontiac?

7 A I don't recall a specific date. Once the -- once the
8 boxes or, excuse me, once the documents were -- the quick
9 reference of those documents were no longer needed at arm's
10 length, they were moved to the vault at Pontiac.

11 Q Are we talking months or weeks?

12 A Multiple -- I mean several months ago. At least a
13 year ago they've been in Pontiac from today's date.

14 Q At the defendant's arraignment he received some
15 discovery with a report, with a notation on the pleading that
16 he could make -- he could inspect the documents at Pontiac.
17 Do you recall that?

18 A Yes, sir.

19 Q All right. That was in September of last year.

20 A Yes, I believe that that date --

21 Q So in relation to that date, when were they taken to
22 Pontiac?

23 A Three to six months prior to that date.

24 Q All right. On December 22nd, 2016, after 9:38 a.m.

1 at the facility did you determine that any of the boxes or
2 their contents were beyond the authority of the warrant?

3 A At the storage unit?

4 Q At the facility.

5 A No, it would have been impossible for us to determine
6 that at the time.

7 Q Well, you would have had to look inside the boxes?

8 A Yes, we would have had to have looked at every single
9 file folder inside 61 plus boxes in that unit to determine
10 which were necessary to leave behind.

11 Q Okay. At some point in time you determined 27 boxes
12 were outside the scope of the warrant?

13 A Yes, that's correct.

14 Q When was that?

15 A Once the warrant was executed, we seized all those
16 boxes. We loaded them up. We took them to a secure, covert
17 facility for the Illinois State Police. We then started
18 itemizing or putting the boxes in date order, and then as we
19 went along we began to go through the boxes. Those -- many
20 of those boxes had black Sharpie marker --

21 Q That's not my question. My question is when, not how
22 you determined. When did you determine that you had 27 boxes
23 that were beyond the scope of the warrant?

24 A I couldn't tell you a specific date of exactly when.

1 I mean it was a long process going through each box and each
2 document to determine what was and what was not inside the
3 scope of the warrant.

4 Q How about a date when you first realized that you had
5 a box that was beyond the scope of the warrant?

6 A Within an hour of being at the secure facility.
7 There were boxes that were labeled 2009. We opened the box.
8 We see that the documents in there are, in fact, from 2009,
9 and that box was immediately set to the side.

10 Q But these 27 boxes, when did you first realize that
11 you had a box that eventually added up to 27 boxes that were
12 beyond the scope of the warrant?

13 A Again, I would say that the first box that we decided
14 was outside the scope of the warrant would have been the day
15 the warrant was executed.

16 Q Okay. Now, prior to your execution of this warrant,
17 you knew that Mr. Butler had a representative that you could
18 communicate with?

19 A Yes, he was represented by legal counsel. That's
20 correct.

21 Q William Mueller?

22 A Yes, sir.

23 Q When did you first contact William Mueller and tell
24 him that you had seized documents beyond the authority of the

1 warrant?

2 A I know I made notice of the warrant later that day.
3 Once we had unloaded everything at the secure facility, I
4 went to his office and gave him a copy of the warrant. I
5 know I had correspondence with him, as well as Mr. Kording,
6 that we did have boxes outside the scope and to arrange
7 return of those boxes.

8 Q Right. That was after September 2016, right, or '17?

9 A With Mr. Beckett, yes. I don't recall when I spoke
10 to Mr. Mueller about it.

11 Q So is it your testimony that you told Mr. Mueller
12 that you had -- before September 2017 that you had documents
13 outside the scope of the warrant that would be returned?

14 A Yes.

15 Q And how was it you were going to return them?

16 A That was undetermined at that time.

17 Q Okay. Did you feel you had authority to hold on to
18 those boxes?

19 A You know, once the search warrant return was
20 complete, once we identified what boxes we felt were
21 evidentiary, yes, I felt that there -- I don't have the
22 authority to return those boxes. However, based on the
23 warrant and based on the fact that we identified I believe
24 you said 24, 27 boxes, were outside the scope, I felt that I

1 did have the authority to return those boxes to Mr. Butler.

2 Q Okay, that really wasn't my question. My question
3 was that you had authority to retain them.

4 A Well, so, the -- yes, I did. I believe that I had
5 the authority to hold on to them until I could confirm that
6 every document in those boxes were, in fact, outside the of
7 scope of the warrant. Some boxes that we retrieved in fact
8 had lids on them that said 2010, and yet they were all
9 documents from 2014. So until we were able to thoroughly go
10 through every single box, I couldn't say if all of the boxes
11 that we obtained were in or outside the scope of the warrant.

12 Q But you did determine there were 27 boxes that were
13 outside the scope of the warrant?

14 A Yes.

15 Q Did you return them?

16 A I attempted to return them through Mr. Beckett.

17 Q No, Mr. Kording. I'm Beckett.

18 A Yes, I apologize.

19 Q We're fungible.

20 A There was e-mail correspondence with Mr. Kording. A
21 date was arranged for him to come get them in Pontiac. That
22 arrangement fell apart, and there has been no other
23 correspondence as far as getting those documents back to him.

24 Q In fact, the date to be arranged in Pontiac was for

1 the entire defense team and the defendant to come and examine
2 the boxes where they sat, right?

3 A Yes.

4 Q All of them?

5 A Yes, that's correct; and on top of that, those boxes
6 were set aside and were going to be returned that day.

7 Q And so the onus would be on the defendant to return
8 the boxes back to Bloomington, Illinois, from which they had
9 been taken?

10 A That was the agreement between myself and
11 Mr. Beckett, yes.

12 Q I'm Mr. Beckett.

13 A I apologize, Mr. Kording. I'm sorry. I apologize.

14 Q Well, is there -- what's the reason that you couldn't
15 have returned the boxes when you determined they were beyond
16 the scope of the warrant to the facility that you had taken
17 them from?

18 A I would say that the end date that we determined
19 these boxes are, in fact, outside the scope is relatively
20 close to the date of warrants being issued for their arrest;
21 and I spoke to Mr. Mueller about it I believe the day
22 Mr. Butler was taken into custody, and it was determined that
23 he was not going to continue representation with Mr. Butler.
24 So I was awaiting to see who his counsel would be named.

1 Q As we sit here today, you still have all of the
2 boxes. Is that correct?

3 A Yes, sir.

4 Q In the motion to suppress we filed, have you seen it?

5 A Yes, sir, I have.

6 Q All right. And the boxes that you -- that you do say
7 were within the scope of the warrant appear to have documents
8 that are outside the scope of the warrant. Would you agree
9 with that?

10 A Yes, sir.

11 Q All right. So what effort have you made to segregate
12 the documents that are outside the scope of the warrant from
13 the documents that are inside the scope of the warrant?

14 A Well, the boxes you're referring to actually contain
15 documents inside the scope of the warrant as well as outside,
16 and in order to preserve the evidence as we collected it, we
17 determined or we decided or I chose to keep those documents
18 in the exact same boxes that they were taken from to keep
19 them in their -- to keep the integrity of that piece of
20 evidence or that box, that file box filled with those
21 documents.

22 Q You could apply for a further warrant, could you not?

23 A Yes, sir.

24 Q To obtain legal authority to maintain those records?

1 A Yes, sir.

2 Q Did you do that?

3 A No, sir, I did not.

4 Q So, I'm specifically talking about -- let me hand
5 this to you. So I'm starting with this paragraph. I would
6 just like you to look at that.

7 A Okay, paragraph six here?

8 Q Yes.

9 A Okay.

10 MR. RIGDON: Your Honor, I'm not sure...

11 MR. BECKETT: Paragraph six of the motion to
12 suppress. I've handed him the motion to suppress.

13 Q Do you agree with the description of the items in
14 paragraph six and thereafter regarding documents that are
15 outside the scope of the warrant?

16 A I would agree that your recollection is probably
17 accurate. Without looking at the boxes, I couldn't say, but
18 I will say that, yes, this is probably accurate.

19 THE COURT: Can I ask, because I'm kind of lost
20 here, page six of the motion?

21 MR. BECKETT: Paragraph six, page two.

22 THE COURT: Page two.

23 MR. BECKETT: Through page eight.

24 THE COURT: Okay, thank you.

1 MR. BECKETT: All right, that's what we're talking
2 about.

3 Q And I'm correct what you have done at the direction
4 of the State's Attorney's you've been going through these
5 boxes and you've been scanning documents, correct?

6 A Yes, sir.

7 Q And then those have been provided to us so that we
8 could examine what the contents were?

9 A Yes, sir.

10 Q Would you agree with me that by you having the boxes
11 they have not been available to Mr. Butler?

12 A Yes. Well, the ones that we have determined as
13 evidentiary, yes, that is correct.

14 Q Okay. And the documents in there that I identified
15 in paragraph six, those have not been available to
16 Mr. Butler, correct?

17 A Correct.

18 Q And the 27 boxes are available to Mr. Butler if he
19 makes arrangements to pick them up?

20 A Well, it doesn't have to be arrangements to pick them
21 up. It just has to be an arrangement for transfer of those
22 boxes; however that is facilitated is fine with me. I'm
23 flexible. Part of the reason why it was scheduled for them
24 to pick them up is I felt it would be more convenient since a

1 large group of attorneys would be there to copy documents to
2 begin with that while they have large vehicles it would be
3 easy to transfer or facilitate the transfer of custody of
4 those boxes that were determined outside the scope of the
5 warrant.

6 Q You -- you set the parameters, that two-year
7 parameter, that July or January 1, 2013, or three-year
8 parameter, to March 31st --

9 A Yes, sir.

10 Q -- 2016. That was your parameter, right?

11 A Yes, sir.

12 Q That's the parameter that you asked the judge to
13 approve in the search warrant?

14 A Yes, sir.

15 Q In your complaint for search warrant, you didn't
16 indicate to the judge that you were going to remove the items
17 from that storage facility in the manner you've described,
18 did you?

19 A Well, we didn't even know if the storage facility
20 would contain documents. We found documentation that
21 suggested or that gave us probable cause to believe that the
22 documents were stored there, but we had no idea what we were
23 going to find once that storage locker was open.

24 Q Right. But you did -- you agreed with me, you didn't

1 put it in the complaint, the original complaint, correct?

2 A Correct.

3 Q And you didn't seek some subsequent warrant that
4 would allow you to take all of the boxes regardless of the
5 date scope?

6 A Well, as far as the investigation was concerned, that
7 would have been unnecessary to get another warrant for those
8 documents. They weren't needed.

9 Q Well, you find a cellphone, right? You want to look
10 at the contents, you go get a warrant?

11 A Right, in most cases, yes.

12 Q Okay. So you find these boxes that appear to be
13 beyond the scope of your warrant, you could get another
14 warrant?

15 A Yes.

16 Q You didn't do that?

17 A No, it wasn't necessary.

18 MR. BECKETT: That's all the questions I have.

19 THE COURT: Mr. Rigdon?

20

21 CROSS EXAMINATION BY MR. RIGDON:

22

23 Q As it relates to the boxes that you seized from the
24 storage unit, we've just generally testified to them as being

1 boxes. Could you describe the boxes a little further as far
2 as size and volume of contents?

3 A I would say about half and half were legal boxes.
4 Maybe half of them were the small standard-size legal boxes.
5 Others were longer than this table here. You know, you're
6 talking about tens of thousands of documents contained within
7 these 61 boxes. Again, there was a table set out at the
8 front of the storage unit. It appeared somebody had been
9 going through the documents. You know, at that point, that's
10 when we decided to move the documents to a further secure
11 location to verify their -- whether they were within the
12 warrant or not at that point.

13 Q And did, as you may have touched on it during direct,
14 did all of the external labeling on the boxes match the
15 actual internal contents?

16 A No.

17 Q And so you had to actually look inside of the boxes
18 one at a time to determine what types of documents were
19 inside of them?

20 A Yes, that's correct.

21 Q And you indicated that took place over a significant
22 course of time?

23 A Yes.

24 Q Would you have been able to do that at the storage

1 unit that day?

2 A No.

3 Q Through the course of the investigation, let's start
4 with the 27 boxes that you determined could not be within the
5 scope of the warrant. Did you use any of the contents of
6 those warrants in furthering the investigation or those
7 boxes, excuse me, in furthering the investigation?

8 A No.

9 Q What did you do with them once you determined they
10 were outside the scope of the warrant?

11 A They were set aside. If they were file folders with
12 documents outside the scope inside a box that had documents
13 inside the scope of the warrant they were left in that box
14 and never used.

15 Q And then there is 34 other boxes that were determined
16 to be at least to contain information within the scope of the
17 warrant as far as time frame. Is that correct?

18 A Yes.

19 Q And you kept those together in order to maintain the
20 integrity of the entire box as you found it?

21 A Yes, that's correct.

22 Q If there were documents in those boxes that were from
23 outside the scope of the warrant that was issued, did you
24 utilize those resources or those documents?

1 A No.

2 Q Did you have access -- this warrant for the storage
3 unit was from January 1, 2013, to March 31, 2016. Is that
4 correct?

5 A Yes.

6 Q Was your investigation in its entirety limited to
7 only going back to January 1, 2013?

8 A No.

9 Q Were there other sources through which you located
10 documents and information that you did use prior to
11 January 1, 2013?

12 A Yes, several different sources.

13 Q Were those multiple computers that were searched?

14 A Yes, multiple computers, also boxes of documents left
15 inside the building of the Coliseum, as well as documents
16 provided through subpoena and, like you said, at least three
17 different computers.

18 Q As it relates to the 27 boxes that were determined to
19 be outside the scope, if arrangements were made, could those
20 be delivered somewhere to the defendant?

21 A Yes, they could.

22 Q Was it ever communicated to him that he had to come
23 pick them up in Pontiac?

24 A I don't recall if that verbiage was used. I believe

1 it was established that way because Mr. Kording and his legal
2 team were going to be coming up anyway.

3 Q Were they ever -- were they ever asked to have to
4 deliver them to Bloomington on any particular time or date?

5 A Not that I recall.

6 Q There was -- did you obtain a search warrant in June
7 of 2018 for bank records from CEFCU?

8 A Yes.

9 Q Do you have a copy of the motion in front of you
10 still?

11 A Yes, I do.

12 Q I'd ask you maybe to just refer, with Mr. Beckett's
13 consent, I would just ask him to refer to one of the exhibits
14 that was attached there, exhibit number five, which is the
15 last page of that motion.

16 MR. BECKETT: Yes.

17 MR. RIGDON:

18 Q Can you see that?

19 A Yes.

20 Q Is that a fair and accurate copy of a search warrant
21 that was obtained in June of 2018?

22 A Yes, it is.

23 Q To attempt to highlight a second scrivener's error,
24 down on the issue date does it indicate June in 2016?

1 A Yes, it does.

2 Q Was it nonetheless June of 2018 in which it was
3 issued?

4 A Yes.

5 Q Did you use any of the information from any the
6 61 boxes that was outside the scope of the search warrant in
7 making that request?

8 A No.

9 Q Was any of the -- was any of the information from the
10 boxes outside the scope of the warrants referenced in any way
11 in the complaint?

12 A No.

13 Q Was it, in fact, in part based on analysis of one of
14 the computers that was subject to search?

15 A Yes.

16 MR. RIGDON: Your Honor, I have no other questions
17 for Special Agent Rossiter.

18 THE COURT: Mr. Beckett?

19

20 REDIRECT EXAMINATION BY MR. BECKETT:

21

22 Q Agent Rossiter, you indicated that when you were at
23 the warehouse there was a table with boxes, and it looked
24 like someone was going through the boxes. Do you remember

1 that?

2 A Yes, sir.

3 Q In fact, on December 21st you had served a subpoena
4 duces tecum to Mr. Mueller, had you not?

5 A Yes, that's correct.

6 Q And that subpoena duces tecum asked for BMI
7 Concession documents from January 1, 2013, to March 31, 2016.
8 Is that correct?

9 A Yes.

10 Q And so if there were BMI records there, you would
11 expect someone to be working on compliance with that
12 subpoena, wouldn't you?

13 A Yes, sir.

14 Q Okay. So you didn't think there was anything
15 untoward about somebody being there in their own warehouse
16 looking at documents?

17 A Well, I don't want to speculate what somebody could
18 or could not have been doing there. I assumed that and, in
19 fact, one of the other agents with me recognized Mr. Butler
20 leaving the storage area as we were speaking to the
21 management to serve the warrant to them on the grounds. So
22 we had a good idea of who was there and who was sorting
23 through the documents, but the reasoning for that, that would
24 be speculation on my part.

1 Q Well, you had served the subpoena, had you not?
2 A Yes, that's correct.
3 Q I'm handing you what's marked for identification as
4 Defendant's Exhibit Six.
5 A Okay.
6 Q That's the subpoena for BMI Concession records of
7 December 21, 2016, that you had served. Is that correct?
8 A Yes, sir.
9 MR. BECKETT: I move to admit exhibit six.
10 MR. RIGDON: No objection.
11 THE COURT: Without objection, Defendant's Six is
12 admitted.
13 MR. BECKETT: I have no other questions.
14 THE COURT: Anything else, Mr. Rigdon?
15 MR. RIGDON: No thank you, Your Honor.
16 THE COURT: Thank you.
17 THE WITNESS: Thank you, Judge.
18 (Witness excused.)
19 THE COURT: Any additional evidence, Mr. Beckett?
20 MR. BECKETT: No, Your Honor.
21 THE COURT: Anything, Mr. Rigdon?
22 MR. RIGDON: No, Your Honor.
23 * * * * *
24

