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September 23, 2014
VIA EMAIL AND UPS – NEXT BUSINESS DAY DELIVERY

The Honorable Jason Barickman, Co-Chair
The Honorable Frank J. Mautino, Co-Chair
c/o Jane Stricklin, Executive Director
Legislative Audit Commission
622 Stratton Building
Springfield, IL 62706

Dear Senator Barickman and Representative Mautino,

With Dr. Irving's production over the weekend of 186 records, she has now produced over 1,700 records responsive to the subpoena from the Legislative Audit Commission ("Commission") after reviewing over 4,100 records. At this time, we have completed a review of the records triggered by our electronic search terms, other than records that have been or will be sent separately to John Schomberg, General Counsel, Office of the Governor, as being "potentially protected" emails.

As you know, the search terms we applied returned 7,366 records from over approximately 107,000 electronic records in Dr. Irving's possession. Almost 1,400 of these were initially determined to be "potentially protected" emails and sent to Mr. Schomberg's office. After a preliminary review of the remaining 5,972 records, it was determined that two of the electronic search terms ("high risk communities" and "mentoring") were the cause of a large number of unresponsive documents. A new search was therefore run excluding these two search terms, as follows:

"Safe Communities Initiative" OR "Violence Prevention Initiative" OR "Neighborhood Recovery Program Save Our Youth" OR "Violence Prevention" OR "Safety Net Works" OR "NRI Neighborhood Recovery Initiative" OR "Illinois Violence Prevention Authority" OR "IVPA" OR "Stop the Violence Commission" OR "Chicago Area Project"

This search returned 5,267 records, of which 1,191 had been sent to Mr. Schomberg's office as "potentially protected" emails, leaving 4,076 records originally believed to be non-protected. Through this weekend's production, we had reviewed all but 518 of these 4,076 records, plus other records that were returned to us by Mr. Schomberg's office and deemed "non-privileged."

In attempting to bring this process to a close, it has been discovered that these 518 remaining records are also "potentially protected" emails containing one or more of the attorney names listed in my August 14, 2014 letter. As these 518 records were not included in the original tally of "potentially protected" emails sent to Mr. Schomberg's office, and since Mr. Schomberg's office has indicated that these 518 records, too, are potentially protected by a privilege belonging to the State, we are sending these 518 records to Mr. Schomberg's office to be reviewed for potential privilege. As you know, Dr. Irving is not asserting any privilege over these records.

Finally, as a matter of completeness, we will be reviewing a final group of roughly 700 documents that were originally submitted to Mr. Schomberg with the "potentially privileged" emails and returned to us as



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being "non-responsive, non-privileged." We will inform you in short order if there is a need to make any additional production.

Regards,

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