# **Hnited States District Court** SOUTHERN DISTRICT OF NEW YORK

TO: The University of Maryland Office of the General Counsel

# **GREETINGS:**

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Room 220, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date:

March 29, 2018

Appearance Time: 10:00 a.m.

to testify and give evidence in regard to an alleged violation of:

18 U.S.C. §§ 666, 1341, 1343, 1346, 1349, 1952, 1956

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:

Personal appearance is not required if the requested records are (1) produced by on or before the return date to Special Agent John Vourderis via the contact information on the attached rider; and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. Please contact Special Agent Vourderis directly with any questions. PLEASE PROVIDE IN ELECTRONIC FORMAT IF POSSIBLE.

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED:

New York, New York

March 15, 2018

United States Attorney for the Southern District of New York

Edward B. Diskant/ Eli J. Mark Assistant United States Attorneys

One St. Andrew's Plaza

New York, New York 10007

Telephone: 212-637-2294/-2431

edward.diskant@usdoj.gov/eli.mark@usdoj.gov



# RIDER

(Grand Jury Subpoena to The University of Maryland dated March 15, 2018)

#### **Definitions and Instructions:**

- 1. This Subpoena calls for the production of specific documents—including e-mails and text messages—in the possession, custody or control of The University of Maryland ("Maryland") or any employee, officer, principal, or board member of Maryland for the time period January 1, 2015 to the present.
- 2. This Subpoena applies to any responsive documents wherever they may be found, including any of personal electronic devices including any cellular phone or other telephone, pager, tablet, laptop computer, desktop computer, personal email, cloud storage, messaging or social media accounts used by employees, officers, principals, or board members of Maryland to conduct Maryland business, and including any and all handwritten notes in possession of any employees, officers, principals, or board members of Maryland.
- 3. With the exception of documents containing handwritten notes, please produce requested records in electronic form (native format where necessary to view the material in its full scope) in a manner that is OCR-searchable, and with all available electronic metadata. Please provide the originals of all papers, notepads, notebooks, diaries, or calendars upon which responsive handwritten notes may be found.
- 4. The term "documents" includes writings, emails, text messages, drawings, graphs, charts, calendar entries, photographs, audio or visual recordings, images, and other data or data compilations, and includes materials in both paper and electronic form.
- 5. This Subpoena does not call for the production of any documents protected by a valid claim of privilege, although any responsive document over which privilege is being asserted must be preserved. Any documents withheld on grounds of privilege must be identified on a privilege log with descriptions sufficient to identify their dates, authors, recipients, and general subject matter.

### Materials to be Produced:

1.	Any documents, including communications, regarding or relating to former Maryland
	student-athlete students reflecting but not limited to documents reflecting o
	regarding any improper payments or benefits provided to see, seems s family, or
	representative of present s family.

- 2. Any and all documents, including communications, regarding or relating to Christian Dawkins, including but not limited to any communications between any current or former Maryland employee and Dawkins.
- 3. Any personnel file regarding former Maryland employee Orlando Ranson, including but not limited to any contract between Maryland and Ranson.

4. Any investigative file maintained by Maryland regarding allegations of possible or potential misconduct by Ranson, including any documents and/or communications regarding any alleged violation of NCAA rules and/or the terms of Ranson's contract with Maryland.

Please produce responsive documents to:

Special Agent John Vourderis FBI – New York Field Office 26 Federal Plaza New York, NY 10278, Phone: 646-315-1205 jvourderis@fbi.gov

# United States District Court SOUTHERN DISTRICT OF NEW YORK

TO: The University of Maryland Office of the General Counsel

### **GREETINGS:**

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Room 220, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: July 3, 2018 Appearance Time: 10:00 a.m.

to testify and give evidence in regard to an alleged violation of : 18 U.S.C. §§ 666, 1341, 1343, 1346, 1349, 1952, 1956

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:

Personal appearance is not required if the requested records are (1) produced by on or before the return date to Special Agent John Vourderis via the contact information on the attached rider; and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. Please contact Special Agent Vourderis directly with any questions. **PLEASE PROVIDE IN ELECTRONIC FORMAT IF POSSIBLE.** 

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York

June 21, 2018

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

Edward B. Diskant/ Eli J. Mark Assistant United States Attorneys

One St. Andrew's Plaza

New York, New York 10007

Telephone: 212-637-2294/-2431

edward.diskant@usdoj.gov/eli.mark@usdoj.gov

# **RIDER**

(Grand Jury Subpoena to The University of Maryland dated June 21, 2018)

### **Definitions and Instructions:**

- 1. This Subpoena calls for the production of specific documents—including e-mails and text messages—in the possession, custody or control of The University of Maryland ("Maryland") or any employee, officer, principal, or board member of Maryland for the time period **January 1, 2015 to the present**.
- 2. This Subpoena applies to any responsive documents wherever they may be found, including any of personal electronic devices including any cellular phone or other telephone, pager, tablet, laptop computer, desktop computer, personal email, cloud storage, messaging or social media accounts used by employees, officers, principals, or board members of Maryland to conduct Maryland business, and including any and all handwritten notes in possession of any employees, officers, principals, or board members of Maryland.
- 3. With the exception of documents containing handwritten notes, please produce requested records in electronic form (native format where necessary to view the material in its full scope) in a manner that is OCR-searchable, and with all available electronic metadata. Please provide the originals of all papers, notepads, notebooks, diaries, or calendars upon which responsive handwritten notes may be found.
- 4. The term "documents" includes writings, emails, text messages, drawings, graphs, charts, calendar entries, photographs, audio or visual recordings, images, and other data or data compilations, and includes materials in both paper and electronic form.
- 5. This Subpoena does not call for the production of any documents protected by a valid claim of privilege, although any responsive document over which privilege is being asserted must be preserved. Any documents withheld on grounds of privilege must be identified on a privilege log with descriptions sufficient to identify their dates, authors, recipients, and general subject matter.

### **Materials to be Produced:**

1. Any documents, including communications, regarding or relating to the recruitment, eligibility and/or amateur status of prospective student-athlete Silvio De Sousa.

Please produce responsive documents to:

Special Agent John Vourderis FBI – New York Field Office 26 Federal Plaza New York, NY 10278, Phone: 646-315-1205 jvourderis@fbi.gov