

****II. NARROWED REQUEST**** Pursuant to your suggestion to limit the request to specific matters and specific staff members, True Signal Media narrows FOIA Request No. 77736 as follows:

****RECORDS REQUESTED:****

ALL communications between the Attorney General's Office and the following six members of the Governor's Office:

1. ****JB Pritzker**** - Governor
2. ****Dan Hynes**** - Chief of Staff
3. ****Ann Spillane**** - General Counsel
4. ****Sol Flores**** - Deputy Governor
5. ****Jesse Ruiz**** - Deputy Governor
6. ****Emily Bittner**** - Deputy Chief of Staff for Communications

Concerning the following three specific matters:

****A. Jenny Thornley****

- Criminal prosecution
- Charging decisions (specifically the decision to charge only one count vs. multiple counts)
- Plea negotiations (specifically the acceptance of single-count plea)
- Sentencing recommendations
- Restitution amount (\$10,000 vs. \$67,000+ actual theft)
- Workers' compensation fraud allegations
- Decision not to prosecute workers' compensation fraud

****B. Emily Fox and People ex rel. Fox v. State of Illinois, et al.****

- The qui tam whistleblower lawsuit
- Decision to file Motion to Dismiss
- Litigation strategy
- Evaluation of Emily Fox's allegations
- Cost-benefit analysis referenced in dismissal motion
- Political considerations, if any, in dismissal decision
- Settlement discussions, if any
- Appellate strategy

****C. Workers' Compensation Fraud**

- Prosecutorial Decisions
- Referral from Illinois Department of Insurance concerning Jenny Thornley workers' compensation fraud
- Decision not to prosecute workers' compensation fraud case
- Rationale for declining prosecution
- Alternative referrals (claimed referral to State's Attorneys Appellate Prosecutor)

****DEFINITION OF "COMMUNICATIONS":**

****** Emails, text messages, letters, memoranda, meeting notes, agendas, summaries of meetings or phone calls, briefing materials, and calendar entries documenting information exchange on these matters.

****TIME PERIOD:****

January 1, 2020 through December 31, 2025

****III. SUBSTANTIAL NARROWING ACCOMPLISHED****

****Original Request Scope:**** - All Governor's office staff (approximately 15-20 personnel based on directory)

- Six broad categories of matters
- Six-year time period through present

****Narrowed Request Scope:****

- Six specifically identified senior officials
- Three specific matters (eliminated three categories: Merit Board generally, Jack Garcia specifically, McGuireWoods investigation generally)
- Reduced to five-year completed time period

****This represents approximately a 60% reduction in scope:****

- Personnel: Narrowed from ~20 staff to 6 senior officials
- Subject matter: Eliminated 50% of categories (3 of 6 matters)
- Time period: Reduced from 6 years ongoing to 5 completed years