



U. S. Department of Justice

United States Attorney  
Southern District of Ohio

 **FILE**

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August 15, 2022

By Electronic and Certified U.S. Mail

Public Utilities Commission of Ohio  
c/o Angela Hawkins, Esq.  
180 E. Broad Street  
Columbus, Ohio 43215

RECEIVED-DOCKETING DIV  
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**PUCO**

Re: Case Nos. 20-1502-EL-UNC  
17-974-EL-UNC  
17-2474-EL-RDR  
20-1629-EL-RDR

Dear Commissioners,

This letter is sent pursuant to 28 U.S.C. § 517 to request that the Public Utilities Commission of Ohio ("PUCO") stay all discovery in the above-referenced proceedings (the "PUCO Proceedings").

As you are aware, the United States is conducting an ongoing investigation into corruption relating to Ohio House Bill 6 and action through the Public Utilities Commission of Ohio ("PUCO"). The United States' investigation has resulted in a Deferred Prosecution Agreement with FirstEnergy Corp. and an indictment of several individuals. Trial for two individuals charged in the indictment is scheduled to begin in January 2023.


The United States understands that substantial discovery is underway in the PUCO Proceedings, including written discovery and the potential for depositions of numerous individuals and entities. The PUCO Proceedings involve issues related to

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the United States' investigation, and the United States believes that continued discovery in the PUCO Proceedings may directly interfere with or impede the United States' ongoing investigation.<sup>1</sup> For that reason, the United States respectfully requests that PUCO stay the PUCO Proceedings for a period of six months from the date of this letter. The United States reserves its right to request that the stay be extended beyond this time.

We appreciate your prompt attention to this request. Please let us know if you have any questions.

Very truly yours,

  
KENNETH L. PARKER  
United States Attorney

cc: Emily N. Glatfelter  
Matthew C. Singer

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<sup>1</sup> PUCO has recognized the importance of not interfering with the United States' investigation. See *IN THE MATTER OF THE 2020 REVIEW OF THE DELIVERY CAPITAL RECOVERY RIDER OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND THE TOLEDO EDISON COMPANY*, Case No. 20-1629-EL-RDRR, Entry Dec. 15, 2021 at ¶ 14 (PUCO).