

EXHIBIT 15

STATE OF NEW YORK
COMMISSION ON PUBLIC INTEGRITY

540 Broadway
Albany, New York 12207

IN THE MATTER OF AN INVESTIGATION
INTO SUSAN BRUNO'S WORK STATUS FOR THE
STATE UNIVERSITY OF NEW YORK RESEARCH
FOUNDATION.

**SUBPOENA DUCES
TECUM**

STATE UNIVERSITY OF NEW YORK RESEARCH
FOUNDATION,
RESPONDENT.

TO: State University of New York
Research Foundation
Sherry Holland, Esq.
Senior Vice President, General Counsel
and Secretary

WE COMMAND YOU, that all business and excuses being laid aside, you appear and attend before the New York State Commission on Public Integrity, 540 Broadway, Albany, New York 12207, on the 12th day of May, 2010, at 9:30 in the forenoon, and at any adjourned date thereof, and that you bring with you, and produce at the time and place aforesaid, any and all documents as set forth below:

Definitions and Instructions

- a. The term "Research Foundation" refers to the State University of New York Research Foundation, its officers or employees, and its agents or assigns.
- b. The term "document" and "documents" includes without limitation any of the following within your possession, custody or control: written, printed, recorded, electronic or computerized information, such as personal or official calendars, diaries, journal entries, day books entries, telephone messages, telephone logs, bills, records, audio recordings, video recordings, invoices, correspondence, files, letters, minutes, notes, memoranda, reports and electronic mail (including but not limited to any Research Foundation provided or personal wireless mobile device, or any other electronic mail account used by the Research Foundation), any documents on any personal computer hard drive, server, backup drive, personal electronic device, usb key drive, or any other means of electronic data storage.

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Subpoena Duces Tecum Page 2**

- c. Unless otherwise specified, the time period covered by this *subpoena duces tecum* and for which the Commission seeks the documents described below is from April 25, 2007 through and including March 2, 2009, or the day Susan Bruno ceased employment with the Research Foundation, whichever is later.
- d. If you withhold from production any document responsive to this *subpoena duces tecum*, when you provide the requested documents, also provide a log that, at a minimum: (a) describes each responsive document withheld from production, including a description of (i) its general subject matter, (ii) each author and (iii) each addressee and/or recipient; (b) sets forth any claimed basis for withholding the document from production (*e.g.*, attorney client privilege, work product doctrine or executive privilege); and (c) identifies each person asserting any privilege claim or other basis for withholding a responsive document from production.

PLEASE PROVIDE THE FOLLOWING:

- A. A copy of the Research Foundation's document retention policy.
- B. Any and all documents relating to the Research Foundation's policy on telecommuting, including, but not limited to, any internal control mechanisms to insure employee compliance with such policy.
- C. Any and all documents identifying Research Foundation employees permitted to telecommute, including, but not limited to, documents identifying an employee's work station and job duties.
- D. A copy of Susan Bruno's personnel file.
- E. Copies of Susan Bruno's timesheets.
- F. Copies of Susan Bruno's evaluations.
- G. Any and all documents pertaining to Susan Bruno's telecommuting arrangement, including, but not limited to President John J. O'Connor's decision to permit Susan Bruno to telecommute.
- H. Any and all documents reflecting or constituting Susan Bruno's work product, including, but not limited to, her promotion of public events.
- I. Any and all documents referring to media telephone calls to Research Foundation employees at home, including but not limited to telephone records.

PLEASE BE ADVISED that this request shall also serve to provide notice of your obligation to preserve the requested information, and you are directed to take such necessary steps to do so, as the information sought may constitute evidence in a proceeding authorized by the New York State Commission on Public Integrity.

IF YOU FAIL TO COMPLY: a motion to compel compliance herewith will be made to the Supreme Court of the State of New York, pursuant to the Civil Practice Law and Rules §2308(b), and upon such motion you will be liable to pay in addition to such costs, all losses and damages sustained by reason of your failure to comply to the party aggrieved and forfeit Fifty (\$50.00) Dollars.

You may waive personal production of the above items before the Commission by delivering them to the New York State Commission on Public Integrity at 540 Broadway, Albany, New York 12207.

Dated: April 27, 2010
Albany, New York


Barry Ginsberg
Executive Director