

## STATE OF ARIZONA OFFICE OF ATTORNEY GENERAL

1275 West Washington Phoenix, Arizona 85007 (602) 542-8427

## REQUEST TO PRODUCE RECORDS

TO: Custodian of Records
Bancomer Transfer Services, Inc.
16825 Northchase Drive, Suite 1525
Houston, TX 77060-6090
ATTN: Ernesto Garcia, Jr.

YOU ARE HEREBY COMMANDED, pursuant to A.R.S. § 13-2315, to produce for examination and copying by the Attorney General of the State of Arizona the following described records:

Data, including the data fields described on the attached Data Appendix, relating to each send and each receive transaction of \$500 and greater, sent from or received in an area described as: all of each of the six Mexican states that share a border with the United States, to wit: Baja California Norte, Sonora, Chihuahua, Coahuila, Nuevo Leon, and Tamaulipas, all of the area within Arizona, and the area within California, New Mexico, or Texas that is within 200 miles of the United States/Mexico border on a monthly schedule as each such period becomes available, beginning with January 1, 2014 and ending with December 31, 2014.

The data is to be delivered electronically to the Arizona Attorney General's Office by delivery to its "SWBAMLA SFTP" (Secure File Transfer Protocol) site in a delimited text files format.

All information about transaction details must be contained in one, consolidated table and should only contain completed (sent and paid) transactions. The database is to exclude Commercial Payment (customers paying bills to corporations and businesses and business sending to employees or customers) transactions. A data dictionary should also be provided including a definition of each field, both of its formatting characteristics and plain-English meaning. All fields which are "coded", "lookups" or are abbreviations require the descriptions (full verbose values) to also be provided, including but not limited to country codes and identification types.

This request is made in connection with the lawful performance of my official duties as an Assistant Attorney General of the State of Arizona, in order to investigate racketeering as defined by A.R.S. § 13-2301(D)(4) or a violation of A.R.S. § 13-2312. Your failure to comply in full with this request will subject you to the proceedings provided by A.R.S. § 13-2315(B).

NOTICE: This is a felony investigation. Either warning another person of impending felony prosecution or suppressing physical evidence by concealment, alteration or destruction in a felony investigation are each separate felonies. A.R.S. § 13-2510(2) and (5); § 13-2512.

Please contact the Arizona Attorney General's Office through its investigator Hal White at <a href="https://hal.white@azag.gov">hal.white@azag.gov</a> for any questions regarding production of this request and through its agent Leon Hunt at <a href="https://hunt@visualanalytics.com">hunt@visualanalytics.com</a> for the secure VPN address, and to define a new CSV standard if necessary, for the data delivery.

D. Matthew Conti Senior Litigation Counsel Arizona Attorney General's Office

SUBSCRIBED AND SWORN to before me this 24 day of December, 2013 by D. Matthew Conti.

Notary Public

3-31-17

My Commission expires: \_

CAROL A. KEPPLER Notary Public - State of Arizona

ARICOPA COUNTY
Commission Expires
Nicrol 31, 2017

## **DATA APPENDIX AS LINE ITEMS**

Money Transfer Control Number

Record date & time

Pay date & time

Principal

Sending operator name

Paying operator name

Sending agent number

Sending agent name

Sending agent address

Sending agent city

Sending Agent State

Sending agent zip code

Paying agent number

Paying agent name

Paying agent address

Paying agent city

Paying agent state

Paying agent zip code

Sending currency

Paying currency

Sending country

Paying country

Sender name

Sender address

Sender city

Sender state

Sender zip

Sender phone

Sender DOB

Sender occupation

S ender identification type

Sender identification type description

Sender identification issuer

Sender identification number

Sender SSN (ID2)

Payee name

Payee address

Payee city

Payee state

Payee zip

Payee phone

Pavee DOB

Payee occupation

Payee identification type

Payee identification type description

Payee identification issuer

Payee identification number

Payee SSN (ID2)

## **Certificate of Service**

The undersigned swears (or affirms) that he/she served this Request to Produce Records and did so by personally sending the original by certified mail, return receipt requested, to Custodian of Records, Bancomer Transfer Services, Inc., 16825 Northchase Drive, Suite 1525, Houston, TX 77060-6090, Attn: Ernesto Garcia, Jr. and faxing and emailing to fax number (281)765-1574, and email to Ernesto garcia@btsincusa.com at 300 p.m on the 27 day of December, 2013.

Courl Keppler Officer or Agent

SUBSCRIBED AND SWORN to before me this 27 day of December, 2013 by Carol Keppler.

Notary Public

My Commission Expires:

8/21/2014

OFFICIAL SEAL
SANDRA J. PORTH
Notary Public - State of Arizona
MARICOPA COUNTY
My Comm. Expires Aug. 21, 2014

0751 7717	U.S. Postal Service IN CERTIFIED WAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)  For delivery information visit our website at www.usps.come			
751	OFFICIAL U	SE		
	Postage \$	2		
	Certified Fee	クハン		
	Return Receipt Fee (Endorsement Required)	'ostmark Here		
1160	Restricted Delivery Fee (Endorsement Required)			
H	Tole Custodian of Records			
7005	Bancomer Transfer Services, Inc.			
	16825 Northchase Drive, Suite 1525			
1-	Stree or PO Houston, TX 77060-6090	***************************************		
	高兴 ATTN: Ernesto Garcia, Jr.			
	PS Form 3800, June 2002 See Rever	sellodinshudions		

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DEL	IVERY:
Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.  Print your name and address on the reverse so that we can return the card to you.  Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature  X. V. C. S.  B. Received by (Printed Name)  WASA VACA	☐ Agent☐ Addressee  C. Date of Delivery  //-3/-/3
Article Addressed to:	D. Is delivery address different from Item 1?  Yes  If YES, enter delivery address below:  No	
Custodian of Records Bancomer Transfer Services, Inc. 16825 Northchase Drive, Suite 1525	**************************************	
Houston, TX 77060-6090 ATTN: Ernesto Garcia, Jr.	3. Service Type Certified Mall	il elpt for Merchandise
	4. Restricted Delivery? (Extra Fee)	☐ Yes
Article Number     (Transfer from service label)     7005	5 1160 DOO1 0751 7	717
PS Form 3811, February 2004 Domestic Retu	ırn Receipt	102595-02-M-1540