

TRANSACTION RECORD ANALYSIS CENTER

1275 W WASHINGTON ST
PHOENIX, AZ 85007

1246

99-716/1023 10007



payable through
Wells Fargo Bank, N.A.

DATE 09/23/2015

PAY Eight Hundred Fifty Dollars and 00/100

DOLLARS \$ 850.00



TO THE
ORDER OF

U.S. Treasury

TWO SIGNATURES REQUIRED

Robert J. Piana
Carol Keppler

⑈00001246⑈ ⑆102307164⑆ 6474238521⑈

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

TRANSACTION RECORD ANALYSIS CENTER

DATE	DESCRIPTION	AMOUNT
09/23/2015	User Fee Payment for TRAC, Inc. FORM 1023	\$850.00

**Application for Recognition of Exemption
 Under Section 501(c)(3) of the Internal Revenue Code**

OMB No. 1545-0056
 Note. If exempt status is approved, this application will be open for public inspection.

▶ (Use with the June 2006 revision of the Instructions for Form 1023 and the current Notice 1382)

Use the instructions to complete this application and for a definition of all **bold** items. For additional help, call IRS Exempt Organizations Customer Account Services toll-free at 1-877-829-5500. Visit our website at **www.irs.gov** for forms and publications. If the required information and documents are not submitted with payment of the appropriate user fee, the application may be returned to you.

Attach additional sheets to this application if you need more space to answer fully. Put your name and EIN on each sheet and identify each answer by Part and line number. Complete Parts I - XI of Form 1023 and submit only those Schedules (A through H) that apply to you.

Part I Identification of Applicant

1 Full name of organization (exactly as it appears in your organizing document)		2 c/o Name (if applicable)	
Transaction Record Analysis Center, Inc.		n/a	
3 Mailing address (Number and street) (see instructions)		Room/Suite	4 Employer Identification Number (EIN)
P.O. Box 64088			47-4776033
City or town, state or country, and ZIP + 4		5 Month the annual accounting period ends (01 - 12)	
Phoenix AZ 85082-4088		12	
6 Primary contact (officer, director, trustee, or authorized representative) a Name:		b Phone: 602-721-2335	
Vincent J. Piano		c Fax: (optional) 602-659-5198	
7 Are you represented by an authorized representative, such as an attorney or accountant? If "Yes," provide the authorized representative's name, and the name and address of the authorized representative's firm. Include a completed Form 2848, <i>Power of Attorney and Declaration of Representative</i> , with your application if you would like us to communicate with your representative.		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
8 Was a person who is not one of your officers, directors, trustees, employees, or an authorized representative listed in line 7, paid, or promised payment, to help plan, manage, or advise you about the structure or activities of your organization, or about your financial or tax matters? If "Yes," provide the person's name, the name and address of the person's firm, the amounts paid or promised to be paid, and describe that person's role.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
9a Organization's website: n/a			
b Organization's email: (optional)			
10 Certain organizations are not required to file an information return (Form 990 or Form 990-EZ). If you are granted tax-exemption, are you claiming to be excused from filing Form 990 or Form 990-EZ? If "Yes," explain. See the instructions for a description of organizations not required to file Form 990 or Form 990-EZ.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11 Date incorporated if a corporation, or formed, if other than a corporation. (MM/DD/YYYY)		08 / 03 / 2015	
12 Were you formed under the laws of a foreign country? If "Yes," state the country.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Attachment I

Part II Organizational Structure

You must be a corporation (including a limited liability company), an unincorporated association, or a trust to be tax exempt. (See instructions.) **DO NOT file this form unless you can check "Yes" on lines 1, 2, 3, or 4.**

- 1 Are you a **corporation**? If "Yes," attach a copy of your articles of incorporation showing **certification of filing** with the appropriate state agency. Include copies of any amendments to your articles and be sure they also show state filing certification. **Yes** **No** *Attachment II*
- 2 Are you a **limited liability company (LLC)**? If "Yes," attach a copy of your articles of organization showing certification of filing with the appropriate state agency. Also, if you adopted an operating agreement, attach a copy. Include copies of any amendments to your articles and be sure they show state filing certification. Refer to the instructions for circumstances when an LLC should not file its own exemption application. **Yes** **No**
- 3 Are you an **unincorporated association**? If "Yes," attach a copy of your articles of association, constitution, or other similar organizing document that is dated and includes at least two signatures. Include signed and dated copies of any amendments. **Yes** **No**
- 4a Are you a **trust**? If "Yes," attach a signed and dated copy of your trust agreement. Include signed and dated copies of any amendments. **Yes** **No**
- b Have you been funded? If "No," explain how you are formed without anything of value placed in trust. **Yes** **No**
- 5 Have you adopted **bylaws**? If "Yes," attach a current copy showing date of adoption. If "No," explain how your officers, directors, or trustees are selected. **Yes** **No** *Attachment IV*

Part III Required Provisions in Your Organizing Document

The following questions are designed to ensure that when you file this application, your organizing document contains the required provisions to meet the organizational test under section 501(c)(3). Unless you can check the boxes in both lines 1 and 2, your organizing document does not meet the organizational test. **DO NOT file this application until you have amended your organizing document.** Submit your original and amended organizing documents (showing state filing certification if you are a corporation or an LLC) with your application.

- 1 Section 501(c)(3) requires that your organizing document state your exempt purpose(s), such as charitable, religious, educational, and/or scientific purposes. Check the box to confirm that your organizing document meets this requirement. Describe specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document. Refer to the instructions for exempt purpose language.
 Location of Purpose Clause (Page, Article, and Paragraph): Page 1, 2, Purpose *Attachment II*
- 2a Section 501(c)(3) requires that upon dissolution of your organization, your remaining assets must be used exclusively for exempt purposes, such as charitable, religious, educational, and/or scientific purposes. Check the box on line 2a to confirm that your organizing document meets this requirement by express provision for the distribution of assets upon dissolution. If you rely on state law for your dissolution provision, do not check the box on line 2a and go to line 2c.
 b If you checked the box on line 2a, specify the location of your dissolution clause (Page, Article, and Paragraph). Do not complete line 2c if you checked box 2a. Pages 1-2, 5. Dissolution *Attachment II*
- c See the instructions for information about the operation of state law in your particular state. Check this box if you rely on operation of state law for your dissolution provision and indicate the state:

Part IV Narrative Description of Your Activities

Using an attachment, describe your *past, present, and planned* activities in a narrative. If you believe that you have already provided some of this information in response to other parts of this application, you may summarize that information here and refer to the specific parts of the application for supporting details. You may also attach representative copies of newsletters, brochures, or similar documents for supporting details to this narrative. Remember that if this application is approved, it will be open for public inspection. Therefore, your narrative description of activities should be thorough and accurate. Refer to the instructions for information that must be included in your description. *Attachment III page 1*

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors

- 1a List the names, titles, and mailing addresses of all of your officers, directors, and trustees. For each person listed, state their total annual **compensation**, or proposed compensation, for all services to the organization, whether as an officer, employee, or other position. Use actual figures, if available. Enter "none" if no compensation is or will be paid. If additional space is needed, attach a separate sheet. Refer to the instructions for information on what to include as compensation. *Attachment III Page 2*

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
Vincent J. Piano	President	2120 E. Nicolet Avenue Phoenix AZ 85020	205,000.00
Carol Keppler	Secretary	515 E. Carefree Hwy, # 1132 Phoenix, AZ 85085	None
Kevin Hannah	Treasurer	6782 S. Birdie Way Gilbert AZ 85298	132,000.00
Ron Sterrett	Trustee	6835 W. Briles Road Peoria, AZ 85383	None

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)

b List the names, titles, and mailing addresses of each of your five highest compensated employees who receive or will receive compensation of more than \$50,000 per year. Use the actual figure, if available. Refer to the instructions for information on what to include as compensation. Do not include officers, directors, or trustees listed in line 1a.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)

c List the names, names of businesses, and mailing addresses of your five highest compensated **independent contractors** that receive or will receive compensation of more than \$50,000 per year. Use the actual figure, if available. Refer to the instructions for information on what to include as compensation.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
Dan Kelly, Aquila Investigations LLC	Analytical Supervisor	10742 North 140th Way Scottsdale, AZ 85259	132,000.00
Omar Lucero, Xaris Intelligence LLC	Senior Analyst/Linguistic Specialist	935 E. Jacob Street Chandler, AZ 85225	132,000.00

The following "Yes" or "No" questions relate to *past, present, or planned* relationships, transactions, or agreements with your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in lines 1a, 1b, and 1c.

2a Are any of your officers, directors, or trustees **related** to each other through **family or business relationships**? If "Yes," identify the individuals and explain the relationship. Yes No

b Do you have a business relationship with any of your officers, directors, or trustees other than through their position as an officer, director, or trustee? If "Yes," identify the individuals and describe the business relationship with each of your officers, directors, or trustees. Yes No

c Are any of your officers, directors, or trustees related to your highest compensated employees or highest compensated independent contractors listed on lines 1b or 1c through family or business relationships? If "Yes," identify the individuals and explain the relationship. Yes No

3a For each of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, or 1c, attach a list showing their name, qualifications, average hours worked, and duties.

b Do any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, or 1c receive compensation from any other organizations, whether tax exempt or taxable, that are related to you through **common control**? If "Yes," identify the individuals, explain the relationship between you and the other organization, and describe the compensation arrangement. Yes No

4 In establishing the compensation for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, and 1c, the following practices are recommended, although they are not required to obtain exemption. Answer "Yes" to all the practices you use.

a Do you or will the individuals that approve compensation arrangements follow a conflict of interest policy? Yes No

b Do you or will you approve compensation arrangements in advance of paying compensation? Yes No

c Do you or will you document in writing the date and terms of approved compensation arrangements? Yes No

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)

- d Do you or will you record in writing the decision made by each individual who decided or voted on compensation arrangements? Yes No
- e Do you or will you approve compensation arrangements based on information about compensation paid by **similarly situated** taxable or tax-exempt organizations for similar services, current compensation surveys compiled by independent firms, or actual written offers from similarly situated organizations? Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. Yes No
- f Do you or will you record in writing both the information on which you relied to base your decision and its source? Yes No
- g If you answered "No" to any item on lines 4a through 4f, describe how you set compensation that is **reasonable** for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in Part V, lines 1a, 1b, and 1c.
-
- 5a Have you adopted a **conflict of interest policy** consistent with the sample conflict of interest policy in Appendix A to the instructions? If "Yes," provide a copy of the policy and explain how the policy has been adopted, such as by resolution of your governing board. If "No," answer lines 5b and 5c. Yes No
- b What procedures will you follow to assure that persons who have a conflict of interest will not have influence over you for setting their own compensation?
- c What procedures will you follow to assure that persons who have a conflict of interest will not have influence over you regarding business deals with themselves?
Note. A conflict of interest policy is recommended though it is not required to obtain exemption. Hospitals, see Schedule C, Section I, line 14.
- 6a Do you or will you compensate any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in lines 1a, 1b, or 1c through **non-fixed payments**, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are determined, who is eligible for such arrangements, whether you place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. Yes No
- b Do you or will you compensate any of your employees, other than your officers, directors, trustees, or your five highest compensated employees who receive or will receive compensation of more than \$50,000 per year, through non-fixed payments, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are or will be determined, who is or will be eligible for such arrangements, whether you place or will place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. Yes No
-
- 7a Do you or will you purchase any goods, services, or assets from any of your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," describe any such purchase that you made or intend to make, from whom you make or will make such purchases, how the terms are or will be negotiated at **arm's length**, and explain how you determine or will determine that you pay no more than **fair market value**. Attach copies of any written contracts or other agreements relating to such purchases. Yes No
- b Do you or will you sell any goods, services, or assets to any of your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," describe any such sales that you made or intend to make, to whom you make or will make such sales, how the terms are or will be negotiated at arm's length, and explain how you determine or will determine you are or will be paid at least fair market value. Attach copies of any written contracts or other agreements relating to such sales. Yes No
-
- 8a Do you or will you have any leases, contracts, loans, or other agreements with your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," provide the information requested in lines 8b through 8f. Yes No
- b Describe any written or oral arrangements that you made or intend to make.
- c Identify with whom you have or will have such arrangements.
- d Explain how the terms are or will be negotiated at arm's length.
- e Explain how you determine you pay no more than fair market value or you are paid at least fair market value.
- f Attach copies of any signed leases, contracts, loans, or other agreements relating to such arrangements.
-
- 9a Do you or will you have any leases, contracts, loans, or other agreements with any organization in which any of your officers, directors, or trustees are also officers, directors, or trustees, or in which any individual officer, director, or trustee owns more than a 35% interest? If "Yes," provide the information requested in lines 9b through 9f. Yes No

Attachment IV

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)

- b Describe any written or oral arrangements you made or intend to make.
- c Identify with whom you have or will have such arrangements.
- d Explain how the terms are or will be negotiated at arm's length.
- e Explain how you determine or will determine you pay no more than fair market value or that you are paid at least fair market value.
- f Attach a copy of any signed leases, contracts, loans, or other agreements relating to such arrangements.

Part VI Your Members and Other Individuals and Organizations That Receive Benefits From You

The following "Yes" or "No" questions relate to goods, services, and funds you provide to individuals and organizations as part of your activities. Your answers should pertain to *past, present, and planned* activities. (See instructions.)

- 1a In carrying out your exempt purposes, do you provide goods, services, or funds to individuals? If "Yes," describe each program that provides goods, services, or funds to individuals. Yes No
- b In carrying out your exempt purposes, do you provide goods, services, or funds to organizations? If "Yes," describe each program that provides goods, services, or funds to organizations. Yes No *Attach Mem III Page 3*
- 2 Do any of your programs limit the provision of goods, services, or funds to a specific individual or group of specific individuals? For example, answer "Yes," if goods, services, or funds are provided only for a particular individual, your members, individuals who work for a particular employer, or graduates of a particular school. If "Yes," explain the limitation and how recipients are selected for each program. Yes No
- 3 Do any individuals who receive goods, services, or funds through your programs have a family or business relationship with any officer, director, trustee, or with any of your highest compensated employees or highest compensated independent contractors listed in Part V, lines 1a, 1b, and 1c? If "Yes," explain how these related individuals are eligible for goods, services, or funds. Yes No

Part VII Your History

The following "Yes" or "No" questions relate to your history. (See instructions.)

- 1 Are you a **successor** to another organization? Answer "Yes," if you have taken or will take over the activities of another organization; you took over 25% or more of the fair market value of the net assets of another organization; or you were established upon the conversion of an organization from for-profit to non-profit status. If "Yes," complete Schedule G. Yes No
- 2 Are you submitting this application more than 27 months after the end of the month in which you were legally formed? If "Yes," complete Schedule E. Yes No

Part VIII Your Specific Activities

The following "Yes" or "No" questions relate to specific activities that you may conduct. Check the appropriate box. Your answers should pertain to *past, present, and planned* activities. (See instructions.)

- 1 Do you support or oppose candidates in **political campaigns** in any way? If "Yes," explain. Yes No
- 2a Do you attempt to **influence legislation**? If "Yes," explain how you attempt to influence legislation and complete line 2b. If "No," go to line 3a. Yes No
- b Have you made or are you making an **election** to have your legislative activities measured by expenditures by filing Form 5768? If "Yes," attach a copy of the Form 5768 that was already filed or attach a completed Form 5768 that you are filing with this application. If "No," describe whether your attempts to influence legislation are a substantial part of your activities. Include the time and money spent on your attempts to influence legislation as compared to your total activities. Yes No
- 3a Do you or will you operate bingo or **gaming** activities? If "Yes," describe who conducts them, and list all revenue received or expected to be received and expenses paid or expected to be paid in operating these activities. **Revenue and expenses** should be provided for the time periods specified in Part IX, Financial Data. Yes No
- b Do you or will you enter into contracts or other agreements with individuals or organizations to conduct bingo or gaming for you? If "Yes," describe any written or oral arrangements that you made or intend to make, identify with whom you have or will have such arrangements, explain how the terms are or will be negotiated at arm's length, and explain how you determine or will determine you pay no more than fair market value or you will be paid at least fair market value. Attach copies or any written contracts or other agreements relating to such arrangements. Yes No
- c List the states and local jurisdictions, including Indian Reservations, in which you conduct or will conduct gaming or bingo.

Part VIII Your Specific Activities (Continued)

4a Do you or will you undertake **fundraising**? If "Yes," check all the fundraising programs you do or will Yes No conduct. (See instructions.)

- | | |
|---|--|
| <input type="checkbox"/> mail solicitations | <input type="checkbox"/> phone solicitations |
| <input type="checkbox"/> email solicitations | <input type="checkbox"/> accept donations on your website |
| <input type="checkbox"/> personal solicitations | <input type="checkbox"/> receive donations from another organization's website |
| <input type="checkbox"/> vehicle, boat, plane, or similar donations | <input type="checkbox"/> government grant solicitations |
| <input type="checkbox"/> foundation grant solicitations | <input type="checkbox"/> Other |

Attach a description of each fundraising program.

b Do you or will you have written or oral contracts with any individuals or organizations to raise funds for you? If "Yes," describe these activities. Include all revenue and expenses from these activities and state who conducts them. Revenue and expenses should be provided for the time periods specified in Part IX, Financial Data. Also, attach a copy of any contracts or agreements. Yes No

c Do you or will you engage in fundraising activities for other organizations? If "Yes," describe these arrangements. Include a description of the organizations for which you raise funds and attach copies of all contracts or agreements. Yes No

d List all states and local jurisdictions in which you conduct fundraising. For each state or local jurisdiction listed, specify whether you fundraise for your own organization, you fundraise for another organization, or another organization fundraises for you.

e Do you or will you maintain separate accounts for any contributor under which the contributor has the right to advise on the use or distribution of funds? Answer "Yes" if the donor may provide advice on the types of investments, distributions from the types of investments, or the distribution from the donor's contribution account. If "Yes," describe this program, including the type of advice that may be provided and submit copies of any written materials provided to donors. Yes No

5 Are you **affiliated** with a governmental unit? If "Yes," explain. *Attachment III Page 4* Yes No

6a Do you or will you engage in **economic development**? If "Yes," describe your program. Yes No

b Describe in full who benefits from your economic development activities and how the activities promote exempt purposes.

7a Do or will persons other than your employees or volunteers **develop** your facilities? If "Yes," describe each facility, the role of the developer, and any business or family relationship(s) between the developer and your officers, directors, or trustees. Yes No

b Do or will persons other than your employees or volunteers **manage** your activities or facilities? If "Yes," describe each activity and facility, the role of the manager, and any business or family relationship(s) between the manager and your officers, directors, or trustees. Yes No

c If there is a business or family relationship between any manager or developer and your officers, directors, or trustees, identify the individuals, explain the relationship, describe how contracts are negotiated at arm's length so that you pay no more than fair market value, and submit a copy of any contracts or other agreements.

8 Do you or will you enter into **joint ventures**, including partnerships or **limited liability companies** treated as partnerships, in which you share profits and losses with partners other than section 501(c)(3) organizations? If "Yes," describe the activities of these joint ventures in which you participate. Yes No

9a Are you applying for exemption as a childcare organization under section 501(k)? If "Yes," answer lines 9b through 9d. If "No," go to line 10. Yes No

b Do you provide child care so that parents or caretakers of children you care for can be **gainfully employed** (see instructions)? If "No," explain how you qualify as a childcare organization described in section 501(k). Yes No

c Of the children for whom you provide child care, are 85% or more of them cared for by you to enable their parents or caretakers to be gainfully employed (see instructions)? If "No," explain how you qualify as a childcare organization described in section 501(k). Yes No

d Are your services available to the general public? If "No," describe the specific group of people for whom your activities are available. Also, see the instructions and explain how you qualify as a childcare organization described in section 501(k). Yes No

10 Do you or will you publish, own, or have rights in music, literature, tapes, artworks, choreography, scientific discoveries, or other **intellectual property**? If "Yes," explain. Describe who owns or will own any copyrights, patents, or trademarks, whether fees are or will be charged, how the fees are determined, and how any items are or will be produced, distributed, and marketed. Yes No

Part VIII Your Specific Activities (Continued)

- 11** Do you or will you accept contributions of: real property; conservation easements; closely held securities; intellectual property such as patents, trademarks, and copyrights; works of music or art; licenses; royalties; automobiles, boats, planes, or other vehicles; or collectibles of any type? If "Yes," describe each type of contribution, any conditions imposed by the donor on the contribution, and any agreements with the donor regarding the contribution. Yes No
- 12a** Do you or will you operate in a **foreign country or countries**? If "Yes," answer lines 12b through 12d. If "No," go to line 13a. Yes No
- b** Name the foreign countries and regions within the countries in which you operate.
- c** Describe your operations in each country and region in which you operate.
- d** Describe how your operations in each country and region further your exempt purposes.
- 13a** Do you or will you make grants, loans, or other distributions to organization(s)? If "Yes," answer lines 13b through 13g. If "No," go to line 14a. Yes No
- b** Describe how your grants, loans, or other distributions to organizations further your exempt purposes.
- c** Do you have written contracts with each of these organizations? If "Yes," attach a copy of each contract. Yes No
- d** Identify each recipient organization and any **relationship** between you and the recipient organization.
- e** Describe the records you keep with respect to the grants, loans, or other distributions you make.
- f** Describe your selection process, including whether you do any of the following:
- (i)** Do you require an application form? If "Yes," attach a copy of the form. Yes No
- (ii)** Do you require a grant proposal? If "Yes," describe whether the grant proposal specifies your responsibilities and those of the grantee, obligates the grantee to use the grant funds only for the purposes for which the grant was made, provides for periodic written reports concerning the use of grant funds, requires a final written report and an accounting of how grant funds were used, and acknowledges your authority to withhold and/or recover grant funds in case such funds are, or appear to be, misused. Yes No
- g** Describe your procedures for oversight of distributions that assure you the resources are used to further your exempt purposes, including whether you require periodic and final reports on the use of resources.
- 14a** Do you or will you make grants, loans, or other distributions to foreign organizations? If "Yes," answer lines 14b through 14f. If "No," go to line 15. Yes No
- b** Provide the name of each foreign organization, the country and regions within a country in which each foreign organization operates, and describe any relationship you have with each foreign organization.
- c** Does any foreign organization listed in line 14b accept contributions earmarked for a specific country or specific organization? If "Yes," list all earmarked organizations or countries. Yes No
- d** Do your contributors know that you have ultimate authority to use contributions made to you at your discretion for purposes consistent with your exempt purposes? If "Yes," describe how you relay this information to contributors. Yes No
- e** Do you or will you make pre-grant inquiries about the recipient organization? If "Yes," describe these inquiries, including whether you inquire about the recipient's financial status, its tax-exempt status under the Internal Revenue Code, its ability to accomplish the purpose for which the resources are provided, and other relevant information. Yes No
- f** Do you or will you use any additional procedures to ensure that your distributions to foreign organizations are used in furtherance of your exempt purposes? If "Yes," describe these procedures, including site visits by your employees or compliance checks by impartial experts, to verify that grant funds are being used appropriately. Yes No

Part VIII Your Specific Activities (Continued)

- 15 Do you have a **close connection** with any organizations? If "Yes," explain. Yes No
- 16 Are you applying for exemption as a **cooperative hospital service organization** under section 501(e)? If "Yes," explain. Yes No
- 17 Are you applying for exemption as a **cooperative service organization of operating educational organizations** under section 501(f)? If "Yes," explain. Yes No
- 18 Are you applying for exemption as a **charitable risk pool** under section 501(n)? If "Yes," explain. Yes No
- 19 Do you or will you operate a **school**? If "Yes," complete Schedule B. Answer "Yes," whether you operate a school as your main function or as a secondary activity. Yes No
- 20 Is your main function to provide **hospital or medical care**? If "Yes," complete Schedule C. Yes No
- 21 Do you or will you provide **low-income housing** or housing for the **elderly or handicapped**? If "Yes," complete Schedule F. Yes No
- 22 Do you or will you provide scholarships, fellowships, educational loans, or other educational grants to individuals, including grants for travel, study, or other similar purposes? If "Yes," complete Schedule H. Yes No
- Note. Private foundations** may use Schedule H to request advance approval of individual grant procedures.

Part IX Financial Data

For purposes of this schedule, years in existence refer to completed tax years. If in existence 4 or more years, complete the schedule for the most recent 4 tax years. If in existence more than 1 year but less than 4 years, complete the statements for each year in existence and provide projections of your likely revenues and expenses based on a reasonable and good faith estimate of your future finances for a total of 3 years of financial information. If in existence less than 1 year, provide projections of your likely revenues and expenses for the current year and the 2 following years, based on a reasonable and good faith estimate of your future finances for a total of 3 years of financial information. (See instructions.)

A. Statement of Revenues and Expenses

Type of revenue or expense	3 prior tax years or 2 succeeding tax years				(e) Provide Total for (a) through (d)
	(a) From Jan 2015 To Dec 2015	(b) From Jan 2016 To Dec 2016	(c) From Jan 2017 To Dec 2017	(d) From To	
1 Gifts, grants, and contributions received (do not include unusual grants)	\$1,800,000.00	\$1,800,000.00	\$1,800,000.00		\$5,400,000.00
2 Membership fees received	\$0	\$0	\$0		\$0
3 Gross investment income	\$0	\$0	\$0		\$0
4 Net unrelated business income	\$0	\$0	\$0		\$0
5 Taxes levied for your benefit	\$0	\$0	\$0		\$0
6 Value of services or facilities furnished by a governmental unit without charge (not including the value of services generally furnished to the public without charge)	\$0	\$0	\$0		\$0
7 Any revenue not otherwise listed above or in lines 9-12 below (attach an itemized list)	\$0	\$0	\$0		\$0
8 Total of lines 1 through 7	\$1,800,000.00	\$1,800,000.00	\$1,800,000.00		\$5,400,000.00
9 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is related to your exempt purposes (attach itemized list)	\$0	\$0	\$0		\$0
10 Total of lines 8 and 9	\$1,800,000.00	\$1,800,000.00	\$1,800,000.00		\$5,400,000.00
11 Net gain or loss on sale of capital assets (attach schedule and see instructions)	\$0	\$0	\$0		\$0
12 Unusual grants	\$0	\$0	\$0		\$0
13 Total Revenue Add lines 10 through 12	\$1,800,000.00	\$1,800,000.00	\$1,800,000.00		\$5,400,000.00
14 Fundraising expenses	\$0	\$0	\$0		
15 Contributions, gifts, grants, and similar amounts paid out (attach an itemized list)	\$0	\$0	\$0		
16 Disbursements to or for the benefit of members (attach an itemized list)	\$0	\$0	\$0		
17 Compensation of officers, directors, and trustees	\$0	\$0	\$0		
18 Other salaries and wages	\$731,500.00	\$863,500.00	\$863,500.00		
19 Interest expense	\$0	\$0	\$0		
20 Occupancy (rent, utilities, etc.)	\$220,000.00	\$160,000.00	\$160,000.00		
21 Depreciation and depletion	\$0	\$0	\$0		
22 Professional fees	\$737,500.00	\$711,500.00	\$711,500.00		
23 Any expense not otherwise classified, such as program services (attach itemized list)	\$111,000.00	\$65,000.00	\$65,000.00	Attachment III page 4	
24 Total Expenses Add lines 14 through 23	\$1,800,000.00	\$1,800,000.00	\$1,800,000.00		

Part IX Financial Data (Continued)

B. Balance Sheet (for your most recently completed tax year)		Year End:
Assets		(Whole dollars)
1	Cash	1 \$750,000.00
2	Accounts receivable, net	2 \$0
3	Inventories	3 \$0
4	Bonds and notes receivable (attach an itemized list)	4 \$0
5	Corporate stocks (attach an itemized list)	5 \$0
6	Loans receivable (attach an itemized list)	6 \$0
7	Other investments (attach an itemized list)	7 \$0
8	Depreciable and depletable assets (attach an itemized list)	8 \$0
9	Land	9 \$0
10	Other assets (attach an itemized list)	10 \$0
11	Total Assets (add lines 1 through 10)	11 \$750,000.00
Liabilities		
12	Accounts payable	12 \$0
13	Contributions, gifts, grants, etc. payable	13 \$0
14	Mortgages and notes payable (attach an itemized list)	14 \$0
15	Other liabilities (attach an itemized list)	15 \$632,509.00
16	Total Liabilities (add lines 12 through 15)	16 \$632,509.00
Fund Balances or Net Assets		
17	Total fund balances or net assets	17 \$117,491.00
18	Total Liabilities and Fund Balances or Net Assets (add lines 16 and 17)	18 \$750,000.00
19	Have there been any substantial changes in your assets or liabilities since the end of the period shown above? If "Yes," explain.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Part X Public Charity Status

Part X is designed to classify you as an organization that is either a **private foundation** or a **public charity**. Public charity status is a more favorable tax status than private foundation status. If you are a private foundation, Part X is designed to further determine whether you are a **private operating foundation**. (See instructions.)

- 1 a Are you a private foundation? If "Yes," go to line 1b. If "No," go to line 5 and proceed as instructed. If you are unsure, see the instructions. Yes No
- b As a private foundation, section 508(e) requires special provisions in your organizing document in addition to those that apply to all organizations described in section 501(c)(3). Check the box to confirm that your organizing document meets this requirement, whether by express provision or by reliance on operation of state law. Attach a statement that describes specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document or by operation of state law. See the instructions, including Appendix B, for information about the special provisions that need to be contained in your organizing document. Go to line 2.
- 2 Are you a private operating foundation? To be a private operating foundation you must engage directly in the active conduct of charitable, religious, educational, and similar activities, as opposed to indirectly carrying out these activities by providing grants to individuals or other organizations. If "Yes," go to line 3. If "No," go to the signature section of Part XI. Yes No
- 3 Have you existed for one or more years? If "Yes," attach financial information showing that you are a private operating foundation; go to the signature section of Part XI. If "No," continue to line 4. Yes No
- 4 Have you attached either (1) an affidavit or opinion of counsel, (including a written affidavit or opinion from a certified public accountant or accounting firm with expertise regarding this tax law matter), that sets forth facts concerning your operations and support to demonstrate that you are likely to satisfy the requirements to be classified as a private operating foundation; or (2) a statement describing your proposed operations as a private operating foundation? Yes No
- 5 If you answered "No" to line 1a, indicate the type of public charity status you are requesting by checking one of the choices below. You may check only one box.
 The organization is not a private foundation because it is:
 - a 509(a)(1) and 170(b)(1)(A)(i)—a church or a convention or association of churches. Complete and attach Schedule A.
 - b 509(a)(1) and 170(b)(1)(A)(ii)—a school. Complete and attach Schedule B.
 - c 509(a)(1) and 170(b)(1)(A)(iii)—a hospital, a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital. Complete and attach Schedule C.
 - d 509(a)(3)—an organization supporting either one or more organizations described in line 5a through c, f, g, or h or a publicly supported section 501(c)(4), (5), or (6) organization. Complete and attach Schedule D.

Part X Public Charity Status (Continued)

- e 509(a)(4)—an organization organized and operated exclusively for testing for public safety.
- f 509(a)(1) and 170(b)(1)(A)(iv)—an organization operated for the benefit of a college or university that is owned or operated by a governmental unit.
- g 509(a)(1) and 170(b)(1)(A)(vi)—an organization that receives a substantial part of its financial support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public.
- h 509(a)(2)—an organization that normally receives not more than one-third of its financial support from gross investment income and receives more than one-third of its financial support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions).
- i A publicly supported organization, but unsure if it is described in 5g or 5h. The organization would like the IRS to decide the correct status.

6 If you checked box g, h, or i in question 5 above, you must request either an **advance** or a **definitive ruling** by selecting one of the boxes below. Refer to the instructions to determine which type of ruling you are eligible to receive.

- a **Request for Advance Ruling:** By checking this box and signing the consent, pursuant to section 6501(c)(4) of the Code you request an advance ruling and agree to extend the statute of limitations on the assessment of excise tax under section 4940 of the Code. The tax will apply only if you do not establish public support status at the end of the 5-year advance ruling period. The assessment period will be extended for the 5 advance ruling years to 8 years, 4 months, and 15 days beyond the end of the first year. You have the right to refuse or limit the extension to a mutually agreed-upon period of time or issue(s). Publication 1035, *Extending the Tax Assessment Period*, provides a more detailed explanation of your rights and the consequences of the choices you make. You may obtain Publication 1035 free of charge from the IRS web site at www.irs.gov or by calling toll-free 1-800-829-3676. Signing this consent will not deprive you of any appeal rights to which you would otherwise be entitled. If you decide not to extend the statute of limitations, you are not eligible for an advance ruling.

Consent Fixing Period of Limitations Upon Assessment of Tax Under Section 4940 of the Internal Revenue Code

For Organization

.....
(Signature of Officer, Director, Trustee, or other authorized official)

.....
(Type or print name of signer)

.....
(Date)

.....
(Type or print title or authority of signer)

For IRS Use Only

.....
IRS Director, Exempt Organizations

.....
(Date)

- b **Request for Definitive Ruling:** Check this box if you have completed one tax year of at least 8 full months and you are requesting a definitive ruling. To confirm your public support status, answer line 6b(i) if you checked box g in line 5 above. Answer line 6b(ii) if you checked box h in line 5 above. If you checked box i in line 5 above, answer both lines 6b(i) and (ii).

(i) (a) Enter 2% of line 8, column (e) on Part IX-A, Statement of Revenues and Expenses. \$108,000.00

- (b) Attach a list showing the name and amount contributed by each person, company, or organization whose gifts totaled more than the 2% amount. If the answer is "None," check this box.

(ii) (a) For each year amounts are included on lines 1, 2, and 9 of Part IX-A, Statement of Revenues and Expenses, attach a list showing the name of and amount received from each **disqualified person**. If the answer is "None," check this box.

- (b) For each year amounts are included on line 9 of Part IX-A, Statement of Revenues and Expenses, attach a list showing the name of and amount received from each payer, other than a disqualified person, whose payments were more than the larger of (1) 1% of line 10, Part IX-A, Statement of Revenues and Expenses, or (2) \$5,000. If the answer is "None," check this box.

- 7** Did you receive any unusual grants during any of the years shown on Part IX-A, Statement of Revenues and Expenses? If "Yes," attach a list including the name of the contributor, the date and amount of the grant, a brief description of the grant, and explain why it is unusual. **Yes** **No**

Part XI User Fee Information

You must include a user fee payment with this application. It will not be processed without your paid user fee. If your average annual gross receipts have exceeded or will exceed \$10,000 annually over a 4-year period, you must submit payment of \$850. If your gross receipts have not exceeded or will not exceed \$10,000 annually over a 4-year period, the required user fee payment is \$400. See instructions for Part XI, for a definition of **gross receipts** over a 4-year period. Your check or money order must be made payable to the United States Treasury. *User fees are subject to change. Check our website at www.irs.gov and type "User Fee" in the keyword box, or call Customer Account Services at 1-877-829-5500 for current information.*

- 1 Have your annual gross receipts averaged or are they expected to average not more than \$10,000? Yes No
 If "Yes," check the box on line 2 and enclose a user fee payment of \$400 (Subject to change—see above).
 If "No," check the box on line 3 and enclose a user fee payment of \$850 (Subject to change—see above).
- 2 Check the box if you have enclosed the reduced user fee payment of \$400 (Subject to change).
- 3 Check the box if you have enclosed the user fee payment of \$850 (Subject to change).

I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and that I have examined this application, including the accompanying schedules and attachments, and to the best of my knowledge it is true, correct, and complete.

Please Sign Here

Vincent J. Peano
 (Signature of Officer, Director, Trustee, or other authorized official)

VINCENT J. PEANO
 (Type or print name of signer)
 DIRECTOR
 (Type or print title or authority of signer)

09/24/2015
 (Date)

Reminder: Send the completed Form 1023 Checklist with your filled-in-application.

Form **2848**
(Rev. July 2014)
Department of the Treasury
Internal Revenue Service

Power of Attorney and Declaration of Representative

OMB No. 1545-0150

For IRS Use Only

Received by: _____

Name _____

Telephone _____

Function _____

Date / /

Information about Form 2848 and its instructions is at www.irs.gov/form2848.

Part I Power of Attorney

Caution: A separate Form 2848 must be completed for each taxpayer. Form 2848 will not be honored for any purpose other than representation before the IRS.

1 Taxpayer information. Taxpayer must sign and date this form on page 2, line 7.

Taxpayer name and address TRANSACTION RECORD ANALYSIS CENTER, INC PO BOX 64088 PHOENIX, AZ 85082		Taxpayer identification number(s) 47-4776033	
		Daytime telephone number	Plan number (if applicable)

hereby appoints the following representative(s) as attorney(s)-in-fact:

2 Representative(s) must sign and date this form on page 2, Part II.

Name and address SETH D FINK, CPA 2150 E HIGHLAND AVE, STE 212 PHOENIX, AZ 85016	CAF No. 0301-56167-R PTIN P00468797 Telephone No. 602-274-3405 Fax No. 602-274-9105
Check if to be sent copies of notices and communications <input checked="" type="checkbox"/>	Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>
Name and address	CAF No. PTIN Telephone No. Fax No.
Check if to be sent copies of notices and communications <input type="checkbox"/>	Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>
Name and address	CAF No. PTIN Telephone No. Fax No.
(Note. IRS sends notices and communications to only two representatives.)	Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>
Name and address	CAF No. PTIN Telephone No. Fax No.
(Note. IRS sends notices and communications to only two representatives.)	Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>

to represent the taxpayer before the Internal Revenue Service and perform the following acts:

3 Acts authorized (you are required to complete this line 3). With the exception of the acts described in line 5b, I authorize my representative(s) to receive and inspect my confidential tax information and to perform acts that I can perform with respect to the tax matters described below. For example, my representative(s) shall have the authority to sign any agreements, consents, or similar documents (see instructions for line 5a for authorizing a representative to sign a return).

Description of Matter (Income, Employment, Payroll, Excise, Estate, Gift, Whistleblower, Practitioner Discipline, PLR, FOIA, Civil Penalty, Sec. 5000A Shared Responsibility Payment, Sec. 4980H Shared Responsibility Payment, etc.) (see instructions)	Tax Form Number (1040, 941, 720, etc.) (if applicable)	Year(s) or Period(s) (if applicable) (see instructions)
APPLICATION FOR EXEMPTION	1023	N/A

4 Specific use not recorded on Centralized Authorization File (CAF). If the power of attorney is for a specific use not recorded on CAF, check this box. See the instructions for Line 4. Specific Use Not Recorded on CAF

5a Additional acts authorized. In addition to the acts listed on line 3 above, I authorize my representative(s) to perform the following acts (see instructions for line 5a for more information):

Authorize disclosure to third parties; Substitute or add representative(s); Sign a return; _____

Other acts authorized: _____

Attachment II

CORPORATION COMMISSION
FILED

AZ Corp. Commission



05177890

JUL 17 2015

FILE NO. 2020081.8

**ARTICLES OF INCORPORATION
OF TAX - EXEMPT
Transaction Record Analysis Center, Inc.
(Arizona Non-Profit Corporation)**

AZ CORPORATION COMMISSION
FILED

1. **Name:** The Name of the Corporation is Transaction Record Analysis Center, Inc.
2. **Purpose:** The purpose for which the corporation is organized is to educate law enforcement and industry to money laundering techniques and trends.
3. **Character of Affairs:** The character of affairs of the corporation will be: to educate local law enforcement regarding wire fraud techniques for detection, investigation, and education. The organization will conduct investigations in conjunction with local law enforcement as an educational method. The organization develops tools for fraud identification that will be utilized in the investigation and educational process.
4. No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to its member, directors, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article 2. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements,) any political campaign on behalf of any candidate for public office. Notwithstanding any other provision of these Articles, the corporation shall not carry on any other activities not permitted to be carried on: (a) by a corporation exempt from Federal Income Tax under Section 501(c)(3) of the Internal Revenue Code of October 9, 1969 (or the corresponding provision of any future United States Internal Revenue Law) or: (b) by a corporation, contribution to which are deductible under Section 501(c)(3) of the Internal Revenue Code of October 9, 1969 (or the corresponding provisions of any future United States Internal Revenue Laws).
5. Upon the dissolution of the corporation, the Board of Directors shall, after paying or making provision for the payment of all of the liabilities of the corporation, dispose of all its assets exclusively for the purposes of the corporation in such a manner, or to such organizations organized and operated exclusively for charitable, educational, religious or scientific purpose as shall at the time qualify as an exempt organization or organizations under Section 501(c)(3) of the Internal Revenue Code of October 9, 1969 (or the corresponding provisions of any future United States Internal Revenue Laws) as the Board of Directors shall determine. Any such assets not disposed of shall be disposed of by the Superior Court of the county in which the principle office of the corporation is then located, exclusively for such purpose or to such an

AUG 08 2015

FILE NO. 20200818

~~organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purpose.~~

6. The power of indemnification under the Arizona Revised Statutes shall not be denied or limited by the bylaws.
7. Board of Directors: The initial board of directors shall consist of three (3) directors. The names and addresses of the persons who are to serve as the directors until the first annual meeting of the member, if a member corporation, or Board of Directors, if the corporation has no members, or until their successors are elected and qualifies are:

Vincent Piano
2120 E. Nicolet Ave.
Phoenix, AZ 85020

Carol Keppler
515 E. Carefree Highway #1132
Phoenix, AZ 85085

Kevin Hannah
6782 S. Birdie Way
Gilbert, AZ 85298

The number of persons to serve on the Board of Directors thereafter shall be fixed by the Bylaws.

8. Known Place of Business. (In Arizona) The street address of the known place of business of the corporation is:

1275 W. Washington Street
Phoenix, AZ 85007

9. Statutory Agent. (In Arizona) The name and address of the statutory agent of the Corporation is:

Kevin Hannah
6782 S. Birdie Way
Gilbert, AZ 85298

10. Incorporators. The name(s) and address(es) of the Incorporators is (are):

Vincent Piano
2120 E. Nicolet Ave.
Phoenix, AZ 85020

Carol Kepler
515 E. Carefree Highway #1132
Phoenix, AZ 85085

Kevin Hannah
6782 S. Birdie Way
Gilbert, AZ 85298

All powers, duties and responsibilities shall cease at the time of delivery of these Articles of Incorporation to the Arizona Corporation Commission.

11. **DISCRIMINATION:** The Corporation will not practice or permit discrimination on the basis of sex, age, race, national origin, religion, or physical handicap or disability.


12. **MEMBERS:** (Check One)

The corporation _____ will XX will not have members.

EXECUTED this 10th day of June, 2015 by all of the incorporators.

Signed:


Vincent Piana


Carol Kepler

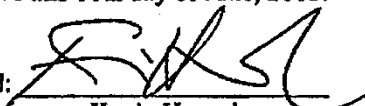

Kevin Hannah

Phone: 602-319-4546

Acceptance of Appointment by Statutory Agent

The undersigned hereby acknowledges and accepts the appointment as statutory agent of the above-named corporation effective this 10th day of June, 2015.

Signed:


Kevin Hannah

Attachment III

Transaction Record Analysis Center, Inc.

IRS Form 1023 Explanations

Part I. Identification of Applicant, question 7.

Authorized Representative's Name: Seth D. Fink CPA, Phocus Accounting & Tax Specialists PLLC, 2150 East Highland Avenue, Suite 212, Phoenix, AZ 85016

Part II. Organizational Structure, question 5.

See By-Laws attached.

Part III. Required Provisions in Your Organizing Document, question 1.

Location of Purpose Clause (Page, Article, and Paragraph): Page 1, 2. Purpose

Part III. Required Provisions in Your Organizing Document, question 2b.

Location of Dissolution Clause (Page, Article, and Paragraph): Pages 1-2, 5. Dissolution

Part IV. Narrative Description of Your Activities.

The Transaction Record Analysis Center, Inc. (herein referred to as "TRAC") provides law enforcement entities and financial institutions around the United States with education, research, and training in the area of Anti-Money Laundering. Specifically TRAC analyzes transaction data from the Money Service Business industry and provides education and training on the trends and corridors of money movement as it relates to money laundering activities. TRAC also provides training to law enforcement agencies across the United States in the investigation and analysis of Money Service Business transaction data.

TRAC's existence came out of an amended settlement agreement between a Money Service Business company, Western Union and the Arizona Attorney General's Office. This amended settlement agreement created and funded the TRAC, a spin-off from the existing quasi-governmental entity, the Southwest Border Anti-Money Laundering Alliance. The Southwest Border Anti-Money Laundering Alliance was formed and funded as part of the original settlement agreement between Western Union and the Arizona Attorney General's Office to combat money laundering in the Southwest Border States area.

Part V. Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees and Independent Contractors, question 3a.

Name, qualifications, average hours worked, and duties:

Vincent J. Piano is the Director of the Transaction Record Analysis Center. The average hours worked during a calendar year is 1760. Duties of the Director include: Exercise programmatic, administrative, and fiscal oversight of the Transaction Record Analysis Center. Use good faith efforts to increase and foster industry and law enforcement participation in TRAC to assist in their identification of money laundering activities. Oversee industry and law enforcement investigators and analysts to bring them together through training and education so they may achieve their mutual goals of effectively deterring, detecting, and preventing money laundering.

Qualifications: Vincent J. Piano was a member of the Phoenix Police Department for over 32 years. Vince was the Commander of the Arizona Financial Crimes Task Force and the Lieutenant of the Conspiracy and Technical Surveillance Units. Vince was instrumental in the creation of the Arizona Financial Crimes Task Force and Arizona Financial Investigative Resource Group that have been in place for over 10 years. Vince continues his role as the Arizona Financial Crimes Task Force Commander as well as Director of the Southwest Border Anti-Money Laundering Alliance. Vince has testified as an expert in Southwest Border Money Laundering and has worked money laundering cases from human smuggling organizations to Mexican Drug Cartel cases.

Kevin Hannah is the IT Program Manager for the Transaction Record Analysis Center. The average hours worked during a calendar year is 1760. Duties Include: Provide computer network administration, planning, and security for networks utilized by TRAC. Coordinate with Visual Analytics/Raytheon Inc., and Money Service Business IT departments in the deployment of TRAC. Exercise technical oversight in the management and coordination, training, and education, for the Money Service Business industry as well as law enforcement agencies.

Qualifications: Kevin Hannah was a 24 year veteran of the Phoenix Police Department with over 18 years of investigative experience in drug enforcement and money laundering. Kevin was the Systems Administrator for the Phoenix Police Departments Drug Enforcement Bureau where he managed numerous sensitive computer networks. Kevin is a certified computer forensic examiner in both Windows and Macintosh operating systems, as well as cell phone forensics. Kevin holds a Bachelor of Science in Justice Studies from Arizona State University.

Dan Kelly is the Analytics Supervisor for the Transaction Record Analysis Center. The average hours worked during a calendar year is 1760. Duties Include: Collect and identify law enforcement related financial intelligence from analysis of money service businesses transaction data. Provide industry and law enforcement with training, education, and intelligence pertaining to typologies and trends of money

movement as it relates to money laundering. Oversee TRAC analysts in carrying out the mission of TRAC.

Qualifications: Dan Kelly was a 22 year veteran of the Arizona Department of Public Safety where he was a member of U.S. Federal law enforcement task forces including 17 years as a sworn Task Force Officer with the DEA Phoenix Field Division. For approximately the past fourteen years, Dan has spent the majority of his time investigating money laundering trends and typologies. Dan has been utilized by the Assistant United States Attorneys as an expert witness related to aspects of money laundering organizations in various Federal Districts. Dan has been analyzing money service business transaction data in support of law enforcement investigations for the past 10 years.

Omar Lucero is a Senior Financial Analyst for the Transaction Record Analysis Center. The average hours worked during a calendar year is 1760. Duties Include: Collect and identify law enforcement related financial intelligence from analysis of money service business transaction data. Provide industry and law enforcement education and training in identifying proactive risk, pattern, and target analysis. Identify channels, amounts, typologies, and vulnerabilities of the flow of illicit money through money service businesses.

Qualifications: Omar Lucero has over ten years' experience providing analytic linguist support to federal and local law enforcement agencies conducting Title III investigations on drug trafficking, human smuggling, money laundering, and other crimes. As an Analytic Linguist subject-matter-expert/trainer, Omar consulted on various data analysis software programs prior to becoming the Regional Program Manager for the analytic linguist sole service provider in the DEA Rocky Mountain Field Division. Omar has worked as a juvenile detention supervisor, at-risk youth program director, and public school teacher. Omar holds a Bachelor of Arts in History and a Bachelor of Arts in Anthropology from the University of Notre Dame.

Additional Trustee: David Otanez, 620 W. Washington Street, Phoenix, AZ 85003. Compensation: None

Part V. Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees and Independent Contractors, question 5a.

See attached **Conflict of Interest Policy** adopted by resolution of the governing board.

Part VI. Your Members and Other Individuals and Organizations that Receive Benefits From You, question 1b.

The Transaction Records Analysis Center, Inc. (TRAC) provides services to law enforcement entities nationwide by providing training, education and access to Money Service Business (MSB) transaction

data. TRAC has a suite of software tools specifically designed to analyze MSB transaction data for the purpose of facilitating money laundering investigations. TRAC provides law enforcement with training and education in area of money laundering and its associated crimes, as well as hands on training to effectively use TRAC's software tools to identify money laundering within the MSB transaction data. TRAC also educates the Money Service Business industry and law enforcement monthly with trends and typologies that TRAC has identified.

Part VIII. Your Specific Activities, question 5

TRAC was created and funded from the amended settlement agreement between a Money Service Business company Western Union and the Arizona Attorney General's Office. This amended settlement agreement created the TRAC from the existing quasi-governmental entity, the Southwest Border Anti-Money Laundering Alliance. The Southwest Border Anti-Money Laundering Alliance was funded as part of the original settlement agreement between Western Union and the Arizona Attorney General's Office to combat money laundering in the Southwest Border States area.

Part IX(a). Financial Data, line 22

Raytheon Cyber Products: \$737,500.00. This expense is for our software partner in the development and website maintenance and deployment of the Transaction Record Analysis Center (TRAC) portal. This portal utilizes a suite of software tools specifically designed to assist and educate law enforcement users in detecting money corridors and money laundering activities within the Money Service Business (MSB) transaction data.

Raytheon Cyber Products deploys, maintains, and enhances all hardware and software features utilized by the TRAC portal.

Part IX(a). Financial Data, line 23

Any expense not otherwise classified, such as program services (attach itemized list)

Training:	\$61,000.00
Travel:	\$50,000.00
TOTAL:	\$111,000.00

Part X Public Charity Status, box g.

TRAC receives a substantial part of its financial support in the form of contributions from an amended settlement agreement between a Money Service Business company, Western Union and the Arizona Attorney General's Office. This amended settlement agreement created and funded the TRAC, a spin-off from the existing quasi-governmental entity, the Southwest Border Anti-Money Laundering Alliance. The Southwest Border Anti-Money Laundering Alliance was formed and funded as part of the original settlement agreement between Western Union and the Arizona Attorney General's Office to combat money laundering in the Southwest Border States area.

5

Form 1023, Part V Compensation and Other Financial Arrangements, question 5 a-

Conflict of Interest Policy
OF THE
TRANSACTION RECORD ANALYSIS CENTER, INC.

Article I
Purpose

The purpose of the conflict of interest policy is to protect this tax-exempt organization's (Transaction Records Analysis Center Inc. (TRAC)) interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Article II
Definitions

1. Interested Person

Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

2. Financial Interest

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Organization has a transaction or arrangement,
- b. A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

Article III
Procedures

1. Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

2. Determining Whether a Conflict of Interest Exists

After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest

- a. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the governing board or committee shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

4. Violations of the Conflicts of Interest Policy

- a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Article IV
Records of Proceedings

The minutes of the governing board and all committees with board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing boards or committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Article V
Compensation

- a. A voting member of the governing board who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- c. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Article VI
Annual Statements

Each director, principal officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person:

- a. Has received a copy of the conflicts of interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy, and
- d. Understands the Organization is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Article VII
Periodic Reviews

To ensure the Organization operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

a. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.

b. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

Article VIII
Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

Conflict of Interest Policy Approved and Adopted this 21st **day of September, 2015**
by:

Vincent Piano *09/23/2015*
Vincent Piano (Date)

Kevin Hannah *9/23/2015*
Kevin Hannah (Date)

Carol Keppler *09-24-2015*
Carol Keppler (Date)

Ron Sterrett *9-24-15*
Ron Sterrett (Date)

David Otanez *9/23/2015*
David Otanez (Date)

Form 1023, Part II Organizational Structure, question 5.

**BY-LAWS
OF THE
TRANSACTION RECORD ANALYSIS CENTER, INC.**

**ARTICLE I
NAME AND REGISTRATIONS**

Section 1. Name

The name of the Corporation shall be Transaction Record Analysis Center, Inc. (hereinafter referred to as the "TRAC").

Section 2. Registered Office and Agent

The Corporation shall maintain in the State of Arizona a registered office and a registered agent whose office shall be identical with such registered office, and may have such other offices within or without the State of Arizona as the Board of Trustees may from time to time determine.

Section 3. Seal

The Board of Trustees shall provide a corporate seal which shall be in the form of a circle and shall have inscribed thereon the name of the Corporation and the words "Corporate Seal, State of Arizona."

**ARTICLE II
PURPOSES**

Section 1. Not for Profit

The Corporation is organized and shall operate as a not-for-profit Corporation, and shall have such powers as are now or may hereafter be granted by the laws governing not-for-profit corporations of the State of Arizona.

Section 2. Purposes

The purposes for which the Corporation is organized subject to the limitations of Article VIII below are charitable, educational, research, and training, within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986, including but not limited to the promotion of education, research, and training activities in the field of Anti-Money Laundering. The TRAC shall receive funds and research, train, and educate law enforcement agencies nationwide in the area of Anti-Money Laundering.

**ARTICLE III
MEMBERS**

The Corporation shall have no members.

**ARTICLE IV
BOARD OF TRUSTEES**

Section 1. General Powers

The policies of the Corporation shall be established by its Board of Trustees, which shall also promote the objectives and programs of the TRAC.

Section 2. Composition, Tenure and Qualifications

The Board of Trustees shall be composed of five (5) members as follows: Vincent Piano, Carol Keppler, Kevin Hannah, Ron Sterrett, and David Otanez.

Members shall be appointed and elected on the basis of their related expertise, their knowledge of the emergent issues facing anti-money laundering, and their agreement with and commitment to the purposes of the TRAC.

The terms of the members of the Board shall be for three (3) years, with a limit of two (2) consecutive three (3) year terms, except that officers of the TRAC may serve three (3) consecutive three (3) year terms.

Section 3. Regular Meetings

A regular annual meeting of the Board of Trustees shall be held at a time and place as may be designated by the President without any other notice than this By-Law and such designation. The Board of Trustees may provide by resolution the time and place for the holding of additional regular meetings of the Board without other notice than such resolution.

Section 4. Special Meetings

Special meetings of the Board of Trustees may be called by the President or a majority of the Trustees. Meetings of the Executive Committee (Officers) may be called by the President.

Section 5. Notice

Notice of any special meeting of the Board of Trustees shall be given at least seven (7) days previously thereto by written notice delivered personally or sent by mail, FAX, or telegram to each trustee, deposited in the United States mail in a sealed envelope so addressed, with postage thereon prepaid. If notice is given by mail, such

notice shall be deemed to be delivered on the day following the day such notice is deposited in the United States mail. If notice is given by FAX or telegram, such notice shall be deemed to be delivered when the FAX or telegram is delivered to the telegraph company. Any trustee may waive notice of any meeting.

Section 6. Quorum

A majority of the Board of Trustees, including at least one officer, shall constitute a quorum for the transaction of business at any meeting of the Board, provided that, if less than a majority of the trustees is present at said meeting, a majority of the trustees present may adjourn the meeting without further notice.

Section 7. Manner of Acting

Each member of the Board of Trustees shall have one vote. The act of a majority – but not less than 3 – of the trustees present at a meeting at which a quorum is present shall be the Act of the Board of Trustees, except where otherwise provided by law or by these By-Laws.

Section 8. Informal Action by Trustees

Any action required to be taken at a meeting of the Board of Trustees or any action which may be taken at a meeting of trustees may be taken and adopted by mail or FAX providing unanimous approval is received. Such action(s) may also be taken by telephone conference call; however, in the case of vote by telephone conference call adoption of any action shall require a vote of at least 3 trustees, as in the case of regular or special meetings.

Section 9. Vacancies

Any vacancy occurring on the Board of Trustees or any trusteeship to be filled by reason of an increase in the number of trustees may be filled in the same manner as provided in the case of the original appointments at the next regular meeting of the Board.

Section 10. Compensation

Two Trustees are receiving a salary as Independent Contractors. The remaining three Trustees shall not receive any salaries for their services as a member of the Board. However, by resolution of the Board of Trustees, expenses of attendance, if any, may be allowed for attendance at each regular or special meeting of the Board.

**ARTICLE V
OFFICERS**

Section 1. Officers

The officers of the Corporation shall be elected from the membership of the Board. They shall be the President, Treasurer and Secretary and their term of office shall be for one (1) year with unlimited reelection permitted.

The President, Treasurer, and Secretary shall perform their duties on behalf of the TRAC and shall serve the TRAC until their successors have been duly elected or appointed.

Section 2. Vacancies

A vacancy in any office because of death, resignation, removal, disqualification or otherwise, may be filled by vote of the Board of Trustees for the unexpired portion of the term.

Section 3. President

The President shall preside at all meetings of the Board of Trustees and shall be Chairman of the Board; and, in general, shall perform all duties incident to the office of President and such other duties as may be prescribed by the Board of Trustees from time to time.

Section 4. Treasurer

The Treasurer shall have charge and custody of and be responsible for all funds and securities of the Corporation, receive and give receipts for monies due and payable by the Corporation, and deposit all such monies in the name of the Corporation in such banks, trust companies, or other depositories as shall be selected in accordance with the duties incident to the office of Treasurer and such duties as from time to time may be assigned to him by the President or the Board of Trustees.

Section 5. Secretary

The Secretary shall keep minutes of the meetings of the Board of Trustees in books provided for the purpose, see that all notices are duly given in accordance with these By-Laws or law, be custodian of the Corporate records and see that the seal is affixed to all necessary documents (the execution of which is duly authorized), and in general, shall perform all duties incident to the office of Secretary and such other duties as from time to time may be assigned to him by the President or the Board of Trustees.

Section 6. Bond and Sureties

The Officers if requested and required by law or the Board of Trustees, shall give bonds for the faithful discharge of their duties in such sums and with such sureties as the Board of Trustees shall determine.

ARTICLE VI COMMITTEES

Section 1. Committees of the TRAC

The Board of Trustees, by resolution adopted by vote of the trustees, may establish one or more committees, each of which shall include one or more trustees. The President of the Corporation shall appoint the chair and members thereof. The Secretary shall serve as the secretary of such committees. However, the designation of such committees and the delegation thereto of authority shall not operate to relieve the Board of Trustees, or individual trustees, of any responsibility imposed upon them by law.

Section 2. Executive Committee

The Board of Trustees shall designate an Executive Committee consisting of its officers (who shall serve without vote) to manage the day-to-day operations of the Corporation, and which shall report no less than annually to the full Board of Trustees.

Section 3. Terms of Office

Each member of a committee shall continue as such until his successor is appointed, unless the committee shall be sooner terminated, or unless such member shall cease to qualify as a member thereof.

Section 4. Vacancies

Vacancies in the membership of any committee may be filled by appointments made in the same manner as provided in the case of the original appointments.

Section 5. Quorum

Unless otherwise provided in the resolution of the Board of Trustees establishing a committee, a majority of the whole committee shall constitute a quorum and a majority of the total members of the committee shall be the act of the committee. If less than a majority of committee members is present at said meetings, a majority of the members present may adjourn the meeting without further notice.

Section 6. Rules

Each committee shall follow Roberts Rules of Order unless it elects to adopt other rules for its own conduct that also are not inconsistent with these By-Laws or with rules adopted by the Board of Trustees.

ARTICLE VII ADMINISTRATION

Section 1. Contracts

The Board of Trustees may authorize any officer or officers, agent or agents of the Corporation, in addition to the officers so authorized by these By-Laws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

Section 2. Checks, Drafts, Purchase Orders, Etc.

All checks, drafts, or other orders for the payment of money, notes, or other evidences of indebtedness issued in the name of the Corporation shall be signed by the President, and countersigned by the Secretary, or in such manner as from time to time may be determined by resolution of the Board of Trustees.

Section 3. Deposits

All funds of the Corporation shall be deposited from time to time to the credit of the Corporation in such banks, trust companies, or other depositories as the Treasurer may select.

Section 4. Gifts

The TRAC may accept, on behalf of the Corporation, any contribution, gift, bequest, or device for the general purpose or for any designated purpose of the Corporation.

Section 5. Books and Records

The Corporation shall keep correct and complete books and records of accounts and shall also keep minutes of the proceedings of its Board of Trustees and its committees. An audit shall be conducted annually.

Section 6. Fiscal Year

The fiscal year of the Corporation shall be the calendar year, unless otherwise specified by resolution of the Board of Trustees.

ARTICLE VIII WAIVER OF NOTICE

Whenever any notice whatsoever is required to be given under the provisions of the General Not For Profit Corporation Act of the State of Arizona or under the provisions of the Articles of Incorporation of these By-Laws of the Corporation, a waiver thereof in writing signed by the person or persons entitled to such notice, whether

