



**STATE OF ARIZONA  
OFFICE OF ATTORNEY  
GENERAL**

1275 West Washington  
Phoenix, Arizona 85007  
(602) 542-8431

**REQUEST TO PRODUCE RECORDS**

TO: Custodian of Records  
Viamericas Corporation  
4641 Montgomery Avenue, Suite 400  
Bethesda, Maryland 20814  
Attention: Joe Massie, Legal Counsel

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 to or from the states of Arizona, California, New Mexico, Texas and the country of Mexico on a monthly schedule as each such period becomes available, beginning with January 1, 2016 and ending with December 31, 2017.

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

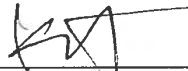
All information about transaction details must be contained in one, consolidated table and should only contain completed (sent and paid) transactions. The database is to exclude Commercial Payment (customers paying bills to corporations and businesses and business sending to employees or customers) transactions. 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).

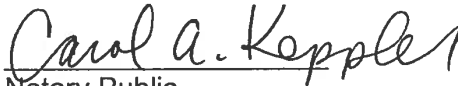
NOTICE: This is a felony investigation. Either warning another person of impending felony prosecution or suppressing physical evidence by concealment, alteration or destruction in a felony investigation are each separate felonies. A.R.S. § 13-2510(2) and (5); § 13-2512.

Please contact the Arizona Attorney General's Office through its investigator Ron Sterrett at [ron.sterrett@azag.gov](mailto:ron.sterrett@azag.gov) for any questions regarding production of this request and through its agent Mike Robinson at [mike.robinson@forcepoint.com](mailto:mike.robinson@forcepoint.com) for the secure VPN address, and to define a new CSV standard if necessary, for the data delivery.

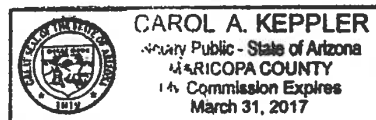


Kalon Metz  
Assistant Attorney General  
Arizona Attorney General's Office

SUBSCRIBED AND SWORN to before me this 16<sup>th</sup> day of March, 2017 by Kalon Metz.

  
Notary Public

My Commission expires: MARCH 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  
Sender 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  
Payee DOB  
Payee occupation  
Payee identification type  
Payee identification type description  
Payee identification issuer  
Payee identification number  
Payee SSN (ID2)

And:

**Web Based Transfers**

- Sender IP Address** used during web account creation
- Sender IP Address** used to send transaction
- Sender Email Address** used to create web based account
- Sender Email Address** used to send transaction
- Sender Source Account Number**
- Sender Name on Web Based Account**
- Sender Included reasons for transaction (if any)**

**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, Viamericas Corporation, 4641 Montgomery Ave., Suite 400, Bethesda, Maryland 20814, Attention: Joe Massie Legal Counsel at 2:25 p.m on the 16<sup>th</sup> day of March, 2017.

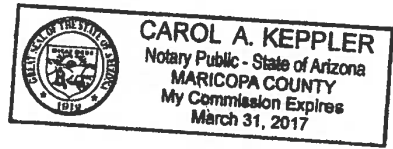
[Signature]  
Officer or Agent

SUBSCRIBED AND SWORN to before me this 16<sup>th</sup> day of March, 2017 by Peggy O'Shea.

[Signature]  
Notary Public

My Commission Expires:

MARCH 31, 2017



91 7199 9991 7037 2771 0244

# USPS Tracking®

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Tracking Number: 9171999991703727710244

Updated Delivery Day: Monday, March 20, 2017

## Product & Tracking Information

Postal Product:

Features:  
Certified Mail™

## Available Actions

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
March 20, 2017 , 11:58 am	Delivered, Left with Individual	BETHESDA, MD 20814
Your item was delivered to an individual at the address at 11:58 am on March 20, 2017 in BETHESDA, MD 20814.		
March 20, 2017 , 8:06 am	Arrived at Unit	SILVER SPRING, MD 20910
March 19, 2017 , 3:17 pm	In Transit to Destination	
March 18, 2017 , 7:04 pm	Departed USPS Facility	GAITHERSBURG, MD 20898
March 18, 2017 , 8:59 am	Arrived at USPS Facility	GAITHERSBURG, MD 20898
March 18, 2017 , 3:35 am	In Transit to Destination	
March 17, 2017 , 7:34 am	Departed USPS Facility	PHOENIX, AZ 85026
March 16, 2017 , 6:43 pm	Arrived at USPS Facility	PHOENIX, AZ 85026

## Track Another Package

Tracking (or receipt) number

Track It

## Manage Incoming Packages

Track all your packages from a dashboard.  
No tracking numbers necessary.

Sign up for My USPS ›



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### OTHER USPS SITES

- Business Customer Gateway
- Postal Inspectors
- Inspector General
- Postal Explorer
- National Postal Museum
- Resources for Developers

### LEGAL INFORMATION

- Privacy Policy
- Terms of Use
- FOIA
- No FEAR Act EEO Data

3/20/2017

FW: Request to Produce Records to Viamericas

**FW: Request to Produce Records to Viamericas**

**Keppler, Carol**

**Sent:** Friday, March 17, 2017 1:09 PM

**To:** mike.robinson@forcepoint.com; Hannah, Kevin; Kelly, Dan; Sterrett, Ron

**Cc:** Piano, Vince

**Attachments:** 2016-2017 Viamericas Corpo~1.pdf (185 KB)

Mike, fyi- this Request went out yesterday to Viamericas Corporation, thanks!

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**From:** Keppler, Carol

**Sent:** Thursday, March 16, 2017 2:43 PM

**To:** Joe Massie

**Cc:** Metz, Kalon

**Subject:** Request to Produce Records to Viamericas

Hello, the attached Request was mailed out today, by certified mail.

Thank you,

Carol Keppler  
Deputy Director

**FW: Viamericas - TRAC**

Kelly, Dan

**Sent:** Friday, February 17, 2017 12:09 PM**To:** Metz, Kalon; Keppler, Carol

Carol and Kaylon

Here is Viamericas' subpoena address. Thanks

Viamericas Corporation  
4641 Montgomery Ave.  
Suite 400  
Bethesda, Maryland 20814  
ATTN Joe Massie Legal Counsel

Dan Kelly  
Arizona Financial Crimes Task Force  
TRAC Analytical Supervisor  
Phoenix HIDTA  
602-659-5186 desk  
602-663-5839 cell

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**From:** Joe Massie [Joe.Massie@viamericas.com]**Sent:** Friday, February 17, 2017 12:00 PM**To:** Kelly, Dan**Cc:** Keppler, Carol**Subject:** RE: Viamericas - TRAC

Hi Dan,

That would be either me or our Chief Compliance Officer, Jaime Castaneda ([Jaime.castaneda@viamericas.com](mailto:Jaime.castaneda@viamericas.com)). Our mailing address is:

Viamericas Corporation  
4641 Montgomery Ave.  
Suite 400  
Bethesda, Maryland 20814

We will be moving on April 1<sup>st</sup> to a new office. I'll make sure to update the address prior to the move.

Regards,

**Joe Massie**

Legal Counsel &amp; Compliance Officer

[joe.massie@viamericas.com](mailto:joe.massie@viamericas.com)

Office: 301-215-9294 ext. 135

[www.viamericas.com](http://www.viamericas.com)The logo for Viamericas, featuring the word "VIAMERICAS" in a bold, italicized, sans-serif font. Above the letters "I" and "A" is a stylized graphic of a curved line with a dot, resembling a globe or a signal wave.



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**From:** Kelly, Dan [mailto:Dan.Kelly@azag.gov]  
**Sent:** Friday, February 17, 2017 1:52 PM  
**To:** Joe Massie <Joe.Massie@viamericas.com>  
**Cc:** Keppler, Carol <Carol.Keppler@azag.gov>  
**Subject:** RE: Viamericas - TRAC

Joe

When you get a chance would you please provide your Viamericas Legal Compliance address and contact person. Thanks and have a peaceful weekend,

Dan Kelly  
Arizona Financial Crimes Task Force  
TRAC Analytical Supervisor  
Phoenix HIDTA  
602-659-5186 desk  
602-663-5839 cell

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**From:** Joe Massie [Joe.Massie@viamericas.com]  
**Sent:** Friday, February 17, 2017 8:36 AM  
**To:** Kelly, Dan  
**Subject:** Viamericas - TRAC

Hello Dan,

You and I exchanged emails last summer regarding TRAC. I'm afraid that I dropped the ball once you requested SAR data for Arizona transactions and never provided you with the information you requested. I have attached sample SAR data and hope that you will once again consider allowing Viamericas to start exchanging information with TRAC.

Thank you,

**Joe Massie**  
Legal Counsel & Compliance Officer  
[joe.massie@viamericas.com](mailto:joe.massie@viamericas.com)  
Office: 301-215-9294 ext. 135  
[www.viamericas.com](http://www.viamericas.com)

The logo for Viamericas, featuring the word "VIAMERICAS" in a bold, italicized, sans-serif font. Above the text is a stylized graphic consisting of a curved line that starts with a small circle on the left and ends with a small circle on the right, resembling a swoosh or a stylized 'V'.



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<https://mail.azag.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAAA692Z6QSYrQ732vmOv37A9BwBWY35QmQ3BSLia8XoDIDcOAAAAG32BAABWY35QmQ3BSL...> 2/3

AGTRAC000416