

EXHIBIT 1

**JON R. ROGERS
12 CARA PLACE
STEUBENVILLE, OHIO 43953**

November 29, 2012

Internal Revenue Service
Disclosure Scanning Operation – Stop 93A
Post Office Box 621506
Atlanta, GA 30362-3006

Attention: **Public Liaison: Ava Littlejohn**
Attention: **Disclosure Officer**
VIA: **FAX @**
VIA: **ORDINARY MAIL**
VIA: **CERTIFIED MAIL**

Federal Bureau of Investigation
Record Information/Dissemination Section
170 Marcel Drive
Winchester, VA 22602-4843

FOIA/PA Mail Referral Unit
Department of Justice
LOC Building
Washington, DC 20530-0001

U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Office of the Assistant Attorney General
Main
Washington, DC 20530

VIA: **FAX @ (202) 514-0293 and (202)
307-2572 and (202) 307-2839**
VIA: **ORDINARY MAIL**
VIA: **CERTIFIED MAIL**

**RE: JON R. ROGERS– FREEDOM OF INFORMATION REQUEST
PRIVACY ACT REQUEST
PUBLIC RECORDS REQUEST**

FBI Pittsburgh
3311 East Carson Street
Pittsburgh, PA 51203

Attention: **Public Liaison**
Attention: **Disclosure Officer**
VIA: **FAX @ (412) 432-4188**
VIA: **ORDINARY MAIL**
VIA: **CERTIFIED MAIL**

United States Attorney
U.S. Department of Justice
633 United States Post Office and Courthouse
Pittsburgh, PA 15219

VIA: **FAX @ (412) 644-2726**
VIA: **ORDINARY MAIL**

TO: DISCLOSURE OFFICERS:

I, Jon R. Rogers, I am making this request for information under the Federal Freedom of Information Act (5 U.S.C. §552) and the Federal Privacy Act (5 U.S.C. §552[a]) and the Ohio Public Records Disclosure Act (Chapter 149 Ohio Revised Code).

If there are any fees for searching for, or copying, records which I am requesting, please let me know the fee estimate in advance. I am willing to pay reasonable fees upon request.

If all or any part of this request is denied, please cite each specific exemption which you think justifies a refusal to release each specific item of information, and inform me of the appeal procedures available to me administratively to appeal that refusal.

I would appreciate your handling this request as quickly as possible, and I am looking forward to hearing from you within the next month, as stipulated by law.

Please send the requested documents to:

**JON R. ROGERS
C/O BRUZZESE & CALABRIA
P.O. BOX 1506
10th Floor--- SINCLAIR BUILDING
STEUBENVILLE, OHIO 43952**

The term “**United States Government**,” as defined in this Request, includes the United States Attorneys for each of the Districts of the U.S. Federal Courts, and any other employees, agents or servants of the United States Department of Justice, Internal Revenue Service [IRS], NSA, CIA, DEA, Treasury Department, Department of State, Office of the President of the United States, White House, U.S. Bureau of International Narcotics Law (“INL”), Computer Fraud Division of the U.S. Department of Justice, U.S. Treasury Department – Financial Crime Enforcement Network (“Fin CEN”), U.S. Ambassador to Antigua, Belize or Barbados, and/or Customs Service.

The phrase “**Civil Forfeiture Case**” means each of the following civil actions, and the phrase “**Civil Forfeiture Cases**” means every one of the following civil actions:

- (1) *United States of America v. Various Accounts in the Names of Jon R. Rogers, Peter T. Mowad, John A. Thorne and Draycott Management Services, Inc.*, Civil Action No. 03-815, in the United States District Court for the Western District of Pennsylvania and/or
- (2) *United States of America v. \$1,660,800.00 in United States Currency, \$122,400 in One Ounce Gold Coins, and One 100 Ounce Silver Block*, Civil Action No. 03-1157, in the United States District Court for the Western District of Pennsylvania and/or
- (3) *United States of America v. Various Account in the Names of Carib International LTD., Fulton Data Processing LTD., Data-Tech 2000 LTD., World Lubricants, LTD., William J.*

Ceasar Enterprises LTD., Jon R. Rogers, John A. Thorne and Peter T. Mowad, Civil Action No. 04-353, in the United States District Court for the Western District of Pennsylvania and/or

(4) *United States of America v. Various Accounts in the Name of Jon R. Rogers*, Civil Action No. 04-838, in the United States District Court for the Western District of Pennsylvania.

The phrase “**this case**” means (1) the above-styled Civil Forfeiture Cases and (2) all Search Warrant proceedings which led to the Search Warrants which were executed on June 3, 2003 at the home of Jon R. Rogers located at 1312 Dennis Way, Toronto, Jefferson County, Ohio and/or the office of Jon R. Rogers located at 1324 Dennis Way, Toronto, Jefferson County, Ohio, and (3) the investigation of Jon R. Rogers [or Jon R. Rogers’s conduct] by any agent or servant of the United States Government and/or Antiguan Government and/or Belize Government, and (4) any Grand Jury proceeding related to the investigation of Jon R. Rogers and/or related to the conduct of Jon R. Rogers and/or related to any formerly-contemplated indictment of Jon R. Rogers.

The items of information which I seek are as follows:

REQUEST NO. 1. TRANSCRIPTS---AUDIO AND VIDEO TAPE RECORDINGS

Please produce all verbatim transcripts (or written summaries), copies of those transcripts (and summaries) of all audio and/or video recordings, which contain any recording of the voice of Jon R. Rogers and/or an image of Jon R. Rogers.

REQUEST NO. 2 AUDIO AND VIDEO TAPE RECORDINGS-ACTUAL

Please produce all actual audio and/or video recordings (audio tape, compact disc, electronically stored, video tape, DVD), which contain any recording of the voice of Jon R. Rogers and/or an image of Jon R. Rogers.

REQUEST NO. 3: INTERCEPTED E-MAIL

Please produce a true, accurate and complete copy of, and/or transcript of, all E-mail and/or instant messaging communication and or text message communication to or from Jon R. Rogers, which has been intercepted or monitored by any agent of the United States Government during the past FIFTEEN (15) years.

REQUEST NO. 4: JON R. ROGERS’S WRITTEN OR ELECTRONIC COMMUNICATIONS

Please produce true, accurate and complete copies of any and all letters, correspondence, electronic communications, forms, tax audit records, agreements, contracts, bank records, checks, accounting records, correspondence, telegrams, notes, wire communications, wires of money, and any and all other written or recorded communications, authored by (or which contain the signature of) Jon R. Rogers.

NOTE: This request includes, but is not limited to, memoranda, summaries, notes, tape recordings, electronic records and knowledge or information obtained by the United States Government from any person, firm, corporation, bank, financial institution, task force, foreign government (including Financial Intelligence Units) or document.

REQUEST NO. 5: THE 18 USC. 1084 VIOLATIONS ALLEGEDLY COMMITTED BY JON R. ROGERS-WIRE TRANSMISSIONS

Please produce all records, notes, writings, photographs, memoranda and/or other documents which identify each and every wire communication, transmission of a bet, acceptance of a bet or transmission of information which allegedly constituted a violation of 18 USC Section 1084, committed by the Jon R. Rogers.

REQUEST NO. 6: THE 18 USC. 1084 VIOLATIONS ALLEGEDLY COMMITTED BY MOWAD-WIRE TRANSMISSIONS

Please produce all records, notes, writings, photographs, memoranda and/or other documents which identify each and every wire communication, transmission of a bet, acceptance of a bet or transmission of information which allegedly constituted a violation of 18 USC Section 1084, committed by Peter Mowad.

REQUEST NO. 7: THE 18 USC. 1084 VIOLATIONS ALLEGEDLY COMMITTED BY THORNE-WIRE TRANSMISSIONS

Please produce all records, notes, writings, photographs, memoranda and/or other documents which identify each and every wire communication, transmission of a bet, acceptance of a bet or transmission of information which allegedly constituted a violation of 18 USC Section 1084, committed by John Thorne.

REQUEST NO. 8: THE 18 USC. 1084 VIOLATIONS ALLEGEDLY COMMITTED BY CARIB-WIRE TRANSMISSIONS

Please produce all records, notes, writings, photographs, memoranda and/or other documents which identify each and every wire communication, transmission of a bet, acceptance of a bet or transmission of information which allegedly constituted a violation of 18 USC Section 1084, committed by Carib and/or Carib International and/or Fulton Data LTD.

**REQUEST NO. 9: THE WIRE FRAUD AND/OR MAIL FRAUD VIOLATIONS
ALLEGEDLY COMMITTED BY CLAIMANT, MOWAD, THORNE
AND/OR CARIB**

Please produce all records, notes, writings, photographs, memoranda and/or other documents which identify each and every Wire Fraud communication and/or Mail Fraud communication which was allegedly committed by Jon R. Rogers, and/or Peter Mowad and/or John Thorne and/or Carib and/or Carib International and/or Fulton Data LTD.

REQUEST NO. 10: FBI 302 FILES and DOSSIERS

Please produce all FBI 302 files and dossiers related to Jon R. Rogers, Peter Mowad, John Thorne and all witnesses who were interviewed by any Government agent in connection with this case. Please produce all videotapes and photographs taken of the searches of Jon R. Rogers's home, office, and/or any bank and/or banking records from January 1, 1993 to date.

Please produce all FBI 302 files related to Carib International and all videotapes and photographs taken of the searches of the office and/or any bank and/or banking records of Carib International, from January 1, 1993 to date.

REQUEST NO. 11: INVESTIGATION FILES AND RECORDS

Please produce true, accurate and complete copies of all files, records, notes, memoranda, writings, communications and/or correspondence by, between or among employees of the United States Government, related to all evidence, information and/or material known to the United States Government [or which may become known or which through due diligence may be learned] which are or have been contained in any file related to any investigation of Jon R. Rogers conducted by the United States Government, including but not limited to the Federal Bureau of Investigation and/or Internal Revenue Service.

REQUEST NO. 12: INVESTIGATION OF CONDUCT OF JON R. ROGERS

Please produce all records, notes, memoranda and/or correspondence by, between or among employees of the United States Government, related to any investigation of any acts or conduct of Jon R. Rogers.

NOTE: This request includes, but is not limited to, memoranda, summaries, notes, tape recordings and knowledge or information obtained by the United States Government from any person, firm, corporation, bank, financial institution, task force, foreign government (including Financial Intelligence Units) or document.

REQUEST NO. 13: DOCUMENTS RELATED TO ALLEGED OR SUSPECTED CONSPIRACY

Please produce all records, notes, memoranda and/or correspondence by, between or among employees of the United States Government, or in the possession of the United States Government, the subject of which is the question of whether or not Jon R. Rogers was involved or connected with, or had any part in activities or statements made by, any other persons which the Government suspected were co-conspirators in any criminal conspiracy.

REQUEST NO. 14: WITNESS STATEMENTS

Please produce true, accurate and complete copies of the following:

- (a) Written and/or audio recorded and/or video recorded statements of all persons the United States Government interviewed as witnesses during the course of any investigation of Jon R. Rogers and/or the conduct of Jon R. Rogers.
- (b) The written statements and/or writings of all witnesses who provided evidence which served as the basis of any allegation raised by the United States Government in its complaint and/or affidavit for Warrant of Arrest in any Civil Forfeiture Action.
- (c) In accordance with the decision of the Supreme Court of the United States in *Goldberg v. United States*, 425 U.S. 94, 96 S. Ct. 1338, 47 L. Ed. 2d 603 (1976), the notes and memoranda made by government counsel during the interviewing of witnesses whom the government intended to call in support of its case in chief in any Civil Forfeiture Action.
- (d) Memoranda of any oral statements which have been given by witnesses who provided evidence which served as the basis of any allegation raised by the United States Government in its complaints and/or affidavits for Warrants of Arrest in any Civil Forfeiture Action..

REQUEST NO. 15: SUMMARIES OF WITNESS STATEMENTS

Please produce summaries and copies of the statements of all witnesses who were interviewed by the United States Government in connection with any criminal investigation of Jon R. Rogers.

REQUEST NO. 16: DOCUMENTS PRESENTED TO GRAND JURY

Please produce copies of all documents pertaining to this case and the related search warrants and the related criminal investigation of Jon R. Rogers in possession of the United States Government and which the Government has presented to any Grand Jury at any time this case was presented for Grand Jury consideration.

REQUEST NO. 17: STATEMENTS OF JON R. ROGERS AND ANY ALLEGED CO-CONSPIRATORS

Please produce the hand-written, stenographic, mechanical or electronic recording or transcript of any oral statement or portions thereof made by Jon R. Rogers or made by any alleged co-conspirator to any person which is in the possession of the Government or which by due diligence could be obtained by the Government.

REQUEST NO. 18: DOCUMENTARY EVIDENCE AND EXHIBITS

Please produce all documents and memoranda in the possession of the United States Government (or which the United States Government has knowledge of) which relate to the subject matter of this case, the search warrants, the formerly-pending or potential criminal case and/or formerly-contemplated indictment; and, all documents, writings or physical objects in the possession of the United States Government (or which the United States Government has knowledge of) which it intended to introduce as evidence upon the trial of any Civil Forfeiture Case.

NOTE: This request specifically includes the results of all scientific tests and examinations relating to photographs, voice exemplars, handwriting exemplars, fingerprints, and chemical or other physical examinations of currency, computer entries, electronic files, and/or Governmental intrusion into banking records.

REQUEST NO. 19: THINGS TAKEN FROM JON R. ROGERS BY SEARCH WARRANT AND/OR CIVIL FORFEITURE WARRANT OF ARREST

Please produce the original or true, accurate and complete copies of any and all tangible things, documents, papers, records, envelopes, or any and all things taken from the possession of Jon R. Rogers or in his presence, (or taken from his wife or in her presence) (or taken from any bank or financial institution) at the time of the execution of any search warrant and/or forfeiture warrant to arrest property located in the United States and/or located in any foreign country.

REQUEST NO. 20: THINGS TAKEN FROM PETER MOWAD BY SEARCH WARRANT AND/OR CIVIL FORFEITURE WARRANT OF ARREST

Please produce the original or true, accurate and complete copies of any and all tangible things, documents, papers, records, envelopes, or any and all things taken from the possession of Peter Mowad or in his presence, (or taken from his wife or in her presence) (or taken from any bank or financial institution) at the time of the execution of any search warrant and/or forfeiture warrant to arrest property located in the United States and/or located in any foreign country.

REQUEST NO. 21: THINGS TAKEN FROM JOHN THORNE BY SEARCH WARRANT AND/OR CIVIL FORFEITURE WARRANT OF ARREST

Please produce the original or true, accurate and complete copies of any and all tangible things, documents, papers, records, envelopes, or any and all things taken from the possession of John Thorne or in his presence, (or taken from his wife or in her presence) (or taken from any bank or financial institution) at the time of the execution of any search warrant and/or forfeiture warrant to arrest property located in the United States and/or located in any foreign country.

REQUEST NO. 22: PHOTGRAPHS AND VIDEO RECORDING OF SEARCHES

(a) Please produce all videotapes and photographs taken of [or during] all searches of [or surveillance of] Jon R. Rogers's home, office, and/or any bank and/or banking records from January 1, 1993 to date.

(b) Please produce all videotapes and photographs taken of [or during] all searches of [or surveillance of] Peter Mowad's home, office, and/or any bank and/or banking records from January 1, 1993 to date.

(c) Please produce all videotapes and photographs taken of [or during] all searches of [or surveillance of] John Thorne's home, office, and/or any bank and/or banking records from January 1, 1993 to date.

REQUEST NO. 23: BOOKS, PAPERS, TANGIBLE OBJECTS, ELECTRONIC FILES

Please produce a true, accurate and complete copy or photograph of any and all books, papers, documents, tangible objects, electronic files, banking records or portions or copies thereof within the possession, custody or control of the United States Government:

- (a) which relate to any transactions, conversations, meetings, telephone calls, transfer of money, letter, e-mail or other communications between Jon R. Rogers and/or Peter Mowad and/or John Thorne and/or any alleged co-conspirators pertaining or in any way relating to any conspiracy or conduct in concert that has been the basis for the allegations which the Plaintiff made in the Plaintiff's Complaints in the Civil Forfeiture Cases;

- (b) which relate to the use of any documents or instruments by Jon R. Rogers and/or Peter Mowad and/or John Thorne and/or any of the alleged co-conspirators for alleged actual or attempted wrongdoing;
- (c) which are owned by, or were in the actual or constructive custody of Jon R. Rogers, and were obtained by the United States Government voluntarily, by seizure, or by process or by exercise of authority under the PATRIOT Act or under authority of any Mutual Legal Assistance Treaty (MLAT), during the investigation of the case;
- (d) which were obtained by the United States Government voluntarily, by seizure, or by process from the actual or constructive custody of any of the other individuals or organizations (including Peter Mowad, John Thorne, Carib International, Fulton Data LTD, foreign banks, domestic banks, or foreign government) during the investigation of this case.

REQUEST NO.24: INFORMATION CONCERNING MAIL COVER

Please produce all records, notes, memoranda and/or correspondence by, between or among employees of the United States Government, or in the possession of the United States Government, related to the existence, extent and duration of any mail cover or surveillance of the mail of Jon R. Rogers or any persons involved as alleged co-conspirators or witnesses in this case, which was conducted by the United States Government.

REQUEST NO. 25: INFORMATION CONCERNING GOVERNMENT NEGOTIATIONS, PROMISES OF LENIENCY OR PLEA BARGAINING

Please produce all records, notes, memoranda and/or correspondence by, between or among employees of the United States Government, or in the possession of the United States Government, related to the existence and scope of any offers of immunity, plea bargains, promises of leniency, indications of leniency, or negotiations concerning pleas conducted by the United States Government with any potential defendant, co-conspirator, bank employee, credit card company employee, Western Union employee, or witness concerning matters related to this case and/or any formerly-contemplated Indictment of Jon R. Rogers.

REQUEST NO. 26: GRAND JURY

Please provide copies of the following documents, which relate to any Grand Jury to which the United States Government has presented any testimony or other evidence in connection with this case.

- (a) Copies of all documents and exhibits which were presented to the Grand Jury.

- (b) Summaries and copies of the statements of witnesses not presented or conveyed to the Grand Jury, where such witness did appear before the Grand Jury.
- (c) All records showing the names and titles of each Government employee who was present in the Grand Jury room during the taking of any testimony (other than his own) in the course of the investigations of this case, or who was present during any other portion of the Grand Jury proceeding herein.
- (d) All records showing the names and titles of each Government employee who examined outside of the Grand Jury's presence any document or other item obtained by means of any Grand Jury subpoena issued in the course of the investigation of this case.
- (e) A copy of any order, letter or other document authorizing the examination of Grand Jury materials by any United States Government employee.
- (f) A copy of all Grand Jury subpoenas issued for all witnesses, documents and/or testimony in connection with this case.
- (g) A copy of each and every draft of an indictment, which had been drafted (or has been drafted) by any prosecutor or other Government employee, before the Grand Jury had an opportunity to vote to return an indictment.

REQUEST NO. 27: ELECTRONIC SURVEILLANCE, MAIL COVER, SCIENTIFIC EXPERIMENTS, TESTS, MARKINGS, AND TRACINGS

Please produce true, accurate and complete copies of the following:

- (a) All mechanical or electronic recordings that contain any conversations of Jon R. Rogers or any alleged co-conspirator, which were made through the use of a wiretapping, eavesdropping, bugging, infrared, or recording device.
- (b) All mechanical or electronic recordings related to this case, and/or formerly-contemplated indictment, which were obtained through electronic, audio or visual surveillance conducted by any governmental agency or by any agent of the United States Government or any foreign government or by any other person who may have communicated with Jon R. Rogers or which were obtained on or in any place or premises, whether private or business, which Jon R. Rogers owned, leased, occupied, or had some proprietary interest therein.
- (c) All memoranda, logs, reports, records, notes, summaries, transcriptions, communications, and written communications made by any employee or agent of the United States Government or any foreign government concerning any statement or conversation referred to herein above.

- (d) Any and all applications and/or orders pertaining to electronic surveillance referred to herein above.
- (e) Results or reports of any scientific tests, examinations or experiments made in connection with electronic surveillance in this case, including specific tests made, the methods and procedures used and samples of the material tested.
- (f) Any and all photographs, images, electronic files, diagrams, papers, documents, tangible objects or other material showing scenes, places of meetings, or any area where it is claimed that Jon R. Rogers or any alleged co-conspirator, met in connection with any aspect of this case and/or any formerly-contemplated indictment.
- (g) All notes, memoranda, reports or other writings made by officers or agents of any law enforcement agency during surveillance of Jon R. Rogers.

REQUEST NO. 28: PUBLICITY

Please produce true accurate and complete copies of all news releases, press interviews, transcripts of press conferences, and any and all other information furnished to the news media by any United States Government employee, agent or agency, with regard to Jon R. Rogers or any alleged co-conspirators or potential government witnesses.

REQUEST NO. 29: INTERCEPTED E-MAIL

Please produce a true, accurate and complete transcript and copy of all e-mail and/or instant messaging communication to or from Jon R. Rogers, which has been intercepted or monitored by any agent of the United States Government during the past ten (15) years.

REQUEST NO. 30: TAPES AND BUGS

- (a) Please produce all tape and/or digital recordings of any telephone conversation(s) between or among Jon R. Rogers and any other person.
- (b) Please produce all tape or digital recordings of any non-telephonic conversation(s) between or among Jon R. Rogers and any other person.
- (c) Please produce all tape or digital recordings of any conversation between the Jon R. Rogers and any agent, employee, or confidential informant of the United States Government.

REQUEST NO. 31: OTHER TAPES AND BUGS—ROGERS, THORNE AND MOWAD

Please produce true, accurate and complete copies of all audio and/or video recordings made by any “bug” or device which was placed by any employee of the United States

Government in or upon Jon R. Rogers's residence and/or office and/or motor vehicle and/or Jon R. Rogers's person.

Please produce true, accurate and complete copies of all audio and/or video recordings made by any "bug" or device which was placed by any employee of the United States Government in or upon John Thorne's residence and/or office and/or motor vehicle and/or John Thorne's person.

Please produce true, accurate and complete copies of all audio and/or video recordings made by any "bug" or device which was placed by any employee of the United States Government in or upon Peter Mowad's residence and/or office and/or motor vehicle and/or Peter Mowad's person.

REQUEST NO. 32: WIRETAP AUTHORIZATION

Please produce a true, accurate and complete copy of every electronic surveillance application, affidavit, order and/or letter authorizing such surveillance, in connection with Jon R. Rogers, John Thorne, Peter Mowad, Carib and/or in connection with this case.

REQUEST NO. 33: AFFIDAVITS----TRAP AND TRACE

Please provide a true, accurate and complete copy of any Affidavit submitted in support of any Court's Order related to Jon R. Rogers and issued pursuant to Title 18 U.S.C. Sections 3122 and 3123(b), and copy of any Order that seals the application or accompanying documents.

REQUEST NO. 34: COMMUNICATIONS OR OTHER ELECTRONIC SURVEILLANCE

- (a) Please produce any and all voice records, tapes, mechanical or electrical recordings (including all pen register data), logs, records, memoranda, letters, airtels, e-mails, instant messages, text messages, and/or any other records of any and all communications [relating to Jon R. Rogers] which occurred between and among agents and employees of the United States, police officers of the State of Ohio or Pennsylvania, or any other federal, state, foreign, or local agency at any time up to and including the date upon which you receive this request. This request includes, but is not limited to, voice records or tapes of any routinely recorded telephonic communications relating to Jon R. Rogers which occurred between and among agents and employees of the above-mentioned agencies or any other federal, state, foreign, or local agency.
- (b) Please produce any and all voice records, tapes, mechanical or electrical recordings (including all pen register data), logs, records, memoranda, letters, and airtels of any electronic or other surveillance:

- (i) of any wire or oral communications to which Jon R. Rogers and any other person or any alleged co-conspirator was identified as a party;
 - (ii) of any wire or oral communications at any place in which Jon R. Rogers and any other person had an “interest” at the time of surveillance; “interest” meaning any property right or another nexus of use and reasonable expectation of privacy;
 - (iii) of any wire or oral communications intercepted for the purpose, in whole or in part, of gathering evidence or leads against Jon R. Rogers and any other person;
 - (iv) of any wire or oral communication in which Jon R. Rogers and any other person is named or otherwise referred to;
 - (v) of any wire or oral communication intercepted pursuant to warrant or application in which Jon R. Rogers name appears, or which warrant or application was based upon investigatory memoranda, etc., in which the Jon R. Rogers’s name appears;
 - (vi) of any wire or oral communications at any place in which Jon R. Rogers was present at the time of the surveillance;
- (d) Please produce any and all actual voice records, tapes, memoranda, letters, and airtels, e-mails, instant messages, text messages, or any electronic or other surveillance of any wire or oral communications described in (i) through (vi), above, as to any potential co-defendants, unindicted co-conspirators, or other relevant persons.
- (e) Please produce any and all actual voice records, tapes, memoranda, letters, airtels, e-mails, instant messages, text messages, or any electronic or other surveillance of any wire or oral communications to which any attorney for Jon R. Rogers, their agents or employees, was a party; any conversation at which said attorney, his agents, or employees was present; and any surveillance at the homes or offices of any such person.
- (f) Please produce any and all actual voice records, tapes, mechanical or electrical recordings, logs, records, memoranda, letters, and airtels of any electronic or other surveillance of any wire ore oral communications to which a party to that conversation allegedly “consented” and which involves or mentions Jon R. Rogers.
- (g) Please produce any and all actual voice records, tapes, mechanical or electrical recordings, logs, memoranda, records, letters, and airtels, e-mails, instant messages, or any electronic or other interceptions of wire or oral communications

such as are described in (a) through (f), above, which surveillance revealed the existence of said conversations but not the contents.

- (h) The requests for disclosure (a) through (h), above, embrace communications and electronic or other surveillance undertaken not only by the United States, its agents and employees, but by any governmental agency, state or local, or foreign and by any private persons or corporation of which the Government has knowledge or which may be discovered by the exercise of due diligence.
- (i) Please produce any and all applications, affidavits, memoranda, and other papers submitted in support of applications for executive, administrative, or judicial approval of such surveillance as described above, and all administrative judicial and executive orders, opinions and decisions responsive thereto or relating to the surveillance described, above.
- (j) Please produce all airtels, e-mails, instant messages, letters, records, memoranda, or other written material which incorporates or makes reference to, either explicitly or implicitly, the product of any communication or surveillance described above, or makes reference, either explicitly or implicitly, to any communication or surveillance as described above.
- (l) The demands made, above, seek not only disclosure of communications and surveillance presently known to the Government, but that which in the exercise of due diligence may become known to the United States Government or its agents.
- (m) Furnish in place of any record of conversation or surveillance described above, which has been destroyed, the following information: the date and place(s) of the conversation or surveillance, the individuals involved in the conversation, or present at the surveillance, such individuals' last known addresses and telephone numbers, the duration of the conversation or surveillance, the means by which the conversation or surveillance was conducted, the identity or employer of any individuals conducting surveillance, and all other relevant facts, including the reasons for, and method of, destruction.
- (n) Please conduct a search of the files of every federal agency which monitored communications, conducted electronic surveillance, investigated Jon R. Rogers, and all agencies cooperating with said monitoring, surveilling and/or investigating agencies in order to determine whether there have been communications or electronic surveillance as described, above.

REQUEST NO. 35: ROUGH NOTES

Please produce all rough notes taken by any law enforcement officer(s) as part of their investigations related to Jon R. Rogers, notwithstanding whether or not the contents of said notes are incorporated in official records.

REQUEST NO. 36: AMBASSADOR COMMUNICATIONS

Please provide true, accurate and complete copies of all audio or video recordings, tapes, digital recordings, memoranda, letters, airtels, e-mails, instant messages, text messages, correspondence, communiqués, reports, minutes of meetings and/or summaries of the following:

- (a) All statements, conversations, representations and communications from the United States Government's Ambassador to Antigua or Belize, the subject of which included offshore online gaming and/or money laundering that is related to offshore online gaming.
- (b) All statements, conversations, representations and communications from Antigua's or Belize's Ambassador to the United States, the subject of which included offshore online gaming and/or money laundering that is related to offshore online gaming.
- (c) All conversations and communications which occurred between or among Lionel Hurst (Antigua's then-Ambassador to the United States) and Scott Charney (of the White House and/or Department of Justice) in Washington, D.C. in August of 1997.
- (d) All conversations and communications which occurred between or among Lionel Hurst (Antigua's then-Ambassador to the United States) and Jonathan Winer (of the Department of State of the United States) in Washington, D.C. in August of 1997.
- (e) All conversations and communications which occurred between or among Gyneth McAllister (Antigua's Director-Free Trade and Processing Zone) and Scott Charney (of the White House and Department of Justice) in Washington, D.C. in August of 1997.
- (f) All conversations and communications which occurred between or among Gyneth McAllister (Antigua's Director-Free Trade and Processing Zone) and Jonathan Winer (of the Department of State of the United States) in Washington, D.C. in August of 1997.
- (g) All communication to or from Gyneth McAllister to or from any employee or agent of the U.S. Government, from August 1, 1997 to the date of your receipt of this request.

REQUEST NO. 37: TREATIES

- (a) Please produce a true, accurate and complete copy of every Mutual Legal Assistance Treaty ("MLAT") which existed between the United States of America and the government of Antigua and Barbados and/or Belize, from the years 1993

through the date of your receipt of this request. (Please include all “side letters” and other documents which evidence each party’s interpretation of its rights and obligations under that Treaty.)

- (b) Please produce copies of all “MLAT” requests made by the United States Government to any official or representative of any foreign government in connection with this case.
- (c) Please produce a copy of any response made by any such foreign government in response to the “MLAT” requests referred to in (b), above.

REQUEST NO. 38: DIPLOMATIC COMMUNICATIONS

Please produce true accurate and complete copies of all records, reports, minutes, memoranda, notes, correspondence, requests, demands, inquiries, cables, telegrams, e-mails, airtels, transcripts of conversations, audio and/or video recordings of conversations and records of all meetings which relate to the following:

- (a) Negotiations between the United States Government and the Government of Antigua and Barbados in connection with any Mutual Legal Assistance Treaty (MLAT) proposed by (or adopted or ratified by) the United States of America and/or Antigua and Barbados (including any and all “side-letters” and preliminary drafts of “side-letters”).
- (b) Negotiations between the United States Government and the Government of Belize in connection with any Mutual Legal Assistance Treaty (MLAT) proposed by (or adopted or ratified by) the United States of America and/or Belize (including any and all “side-letters” and preliminary drafts of “side-letters”).
- (c) All communications between the United States Government and the Government of Antigua and Barbados, in connection with Antigua’s Office of National Drug Control Policy (for such communications which occurred from the year 1990 to date).
- (d) All communications and negotiations between the United States Government and the Government of Antigua and Barbados in connection with the Financial Action Task Force (“FATF”) (established at the G-7 Economic Summit in Paris, France in 1989, and/or established at the later G-8 Economic Summit).
- (e) True, accurate and complete copies of all records of examinations of the United States Government, Antigua and Belize, which examinations have been conducted under authority of the FATF and/or the FATF 40 Recommendations.
- (f) All negotiations and communications between the United States Government and the Governments of Antigua and Barbados and/or Belize (on the subject of online

gaming and betting and/or money laundering) communicated through (or under authority of) the Caribbean Financial Action Task Force (“CFATF”).

- (g) All communications, negotiations, and/or requests for information (related to online gaming and betting and/or money laundering) between the United States Bureau of International Narcotics and Law (“INL”) and any representative of the Governments of Antigua and Barbados and/or Belize from the year 1990 to date.
- (h) Any and all communications, representations, letters and/or correspondence from Jonathan Winer to any representative of the Governments of Antigua and Barbados and/or Belize (the subject of which was online gaming and betting and/or money laundering) from the year 1990 to date.
- (i) Any and all communications, representations, letters and/or correspondence from the Computer Fraud Division of the United States Department of Justice to any representative of the Governments of Antigua and Barbados and/or Belize (the subject of which was online gaming and betting and/or money laundering) from the year 1990 to date.
- (j) Any and all communications, representations, letters and/or correspondence from Scott Charney to any representative of the Governments of Antigua and Barbados and/or Belize (the subject of which was online gaming and betting and/or money laundering) from the year 1990 to date.
- (k) All communications, letters, correspondence and requests for information (related to online gaming and betting and/or money laundering) between any representative of the United States Government and the Financial Intelligence Units (“FIU’s”) of Antigua and Barbados and/or Belize, from the year 1990 to date.
- (l) All communications, letters, correspondence and requests for information (related to online gaming and betting and/or money laundering) between any representative of the United States Treasury Department’s Financial Crime Enforcement Network (“FinCEN”) and the FIU’s of Antigua and Barbados and/or Belize, from the year 1990 to date.
- (m) All communications and information exchanged by, between or among the United States of America, Antigua and Barbados and/or Belize (in connection with online gaming and betting and/or money laundering) under the authority, terms or provisions of any Financial Information Exchange Agreement (“FIEA”), from 1990 to date.
- (n) A true, accurate and complete copy of the Barbados Plan of Action established in May of 1996 and all communications by, between or among the United States Government and the Governments of Antigua and Barbados and/or Belize under authority of the Barbados Plan of Action.

- (o) All communications by, between or among the United States Government and the Governments of Antigua and Barbados and/or Belize under authority of the States of the Caribbean Community (“Caricom”), from the year 1990 to date.
- (p) All communications, negotiations and representations made by, between and/or among the United States Government and the Governments of Antigua and Barbados and/or Belize in connection with the negotiation of (and adoption of) any General Agreement on Trade and Services (“GATS”), from the year 1990 to date.
- (q) All communications, negotiations, representations and requests for information by, between or among the United States Government and the Governments of Antigua and Barbados and/or Belize (related to online gaming and betting and/or money laundering) conducted under the authority of, or through, the Organization for Economic Cooperation and Development (“OECD”), from the year 1990 to date.
- (r) All communications, representations, negotiations and discussions (which include the subjects of online gaming and betting and/or money laundering) which occurred between the United States Government and any Antiguan Ambassador to the United States, from the year 1990 to date.
- (s) All communications, representations, negotiations and discussions (which include the subjects of online gaming and betting and/or money laundering) which occurred between the United States Government and any Belize Ambassador to the United States, from the year 1990 to date.
- (t) All communications by, between or among the United States Government and the Free Trade and Processing Zone of Antigua and Barbados and/or Belize (the subject of which includes online gaming and betting and/or money laundering), from the year 1990 to date.
- (u) All communications by, between or among the United States Government and the Office of Offshore Gaming of Antigua and Barbados and/or Belize (the subject of which includes online gaming and betting and/or money laundering), from the year 1990 to date.
- (v) All requests for information, requests for assistance and/or requests for the seizure of property which were related to the Claimant or the property which is the subject of this case and which were made by the United States Government to any person, firm, corporation or government official in Antigua or Belize, under authority of the Money Laundering and Financial Crimes Strategy Act of 1998, from the year 1998 to date.

- (w) All requests for information, requests for assistance and/or requests for the seizure of property which were related to the Claimant or the property which is the subject of this case and which were made by the United States Government to any person, firm, corporation or government official in Antigua or Belize, under authority of the Patriot Act, from the year 2001 to date.
- (x) All requests for information, requests for assistance and/or requests for the seizure of property which were related to the Claimant or the property which is the subject of this case and which were made by the United States Government to any person, firm, corporation or government official in Antigua or Belize, under authority of the International Convention for the Suppression of Terrorist Financing (which prevents a party from refusing a request for Mutual Legal Assistance on the ground of bank secrecy), from the year 1997 to date.
- (y) All requests for information, requests for assistance and/or requests for the seizure of property which were related to the Claimant or the property which is the subject of this case and which were made by the United States Government to any person, firm, corporation or government official in Antigua or Belize, under authority of the United Nations Convention against Transnational Organized Crime, from the year 2001 to date.
- (z) All requests for information, requests for assistance and/or requests for the seizure of property which were related to the Claimant or the property which is the subject of this case and which were made by the United States Government to any person, firm, corporation or government official in Antigua or Belize, under authority of Presidential Decision Directive (“PDD”) – 42, from the year 1996 to date.

REQUEST NO. 39: FINANCIAL ADVISORIES AND SANCTIONS

Please produce a true, accurate and complete copy of the Financial Advisory issued against Antigua and Barbados by the United States Treasury Department in April of 1999. Please include true, accurate and complete copies of all records showing the reasons which served as the basis for issuing that financial advisory.

REQUEST NO. 40: AFFIDAVITS IN SUPPORT OF SEARCH WARRANTS AND FORFEITURE ARREST WARRANTS AND “MLAT” REQUESTS

- (a) Please produce true, accurate and complete copies of all affidavits (and testimony, if any) submitted to any magistrate or judge of any United States District Court, in support of any application made by the United States Government for any search warrant which has been issued and/or executed in connection with this case and/or in connection with Jon R. Rogers.

- (b) Please produce true, accurate and complete copies of all affidavits (and testimony, if any) submitted to any magistrate or judge of any United States District Court, in support of any application made by the United States Government for any order of arrest or forfeiture in connection with any of the Civil Forfeiture Cases or forfeitures proceeding related to Jon R. Rogers or this case.
- (c) Please produce true, accurate and complete copies of every affidavit or documentary evidence or testimony submitted in support of any application made by the United States Government for legal assistance or information under the terms of any Mutual Legal Assistance Treaty (“MLAT”) with any government of any foreign nation in connection with Jon R. Rogers or this case.
- (d) Please provide true, accurate and complete copies of all affidavits, testimony and/or documentary evidence provided by the United States Government in support of any action or proceeding or request to seize and/or freeze and/or forfeit the assets of Jon R. Rogers or the assets of any domestic or foreign bank, under authority of the Patriot Act, in connection with this case.

REQUEST NO. 41: DISCIPLINARY RECORD OF SPECIAL AGENT RICHARD E. SCHOTT, JR. AND OTHER AGENTS

- (a) Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, the subject of which is any presently or formerly-contemplated and/or implemented disciplinary action related to Special Agent Richard E. Schott, Jr. in connection with any of his conduct during the investigation of Jon R. Rogers and/or this case.
- (b) Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which show whether any of the law enforcement officers involved in the investigation or prosecution of this case (whether state, federal, foreign, or otherwise) ever been the subject of any adverse internal departmental investigation or discipline, in connection with this case?
- (c) Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which show the results of such investigations and/or disciplinary actions; whether polygraph examinations taken, and if so what were the results; the nature of reports or actions taken, and the contents contained therein?
- (d) Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which show whether any regulation, operating order, circular, letter, or other official

instruction or guideline was violated or breached by the conduct of any individual covered by the same during the course of their official or unofficial involvement in the investigation and/or prosecution of this case.

REQUEST NO. 42: Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, the subject of which is any federal crime allegedly committed by Jon R. Rogers. (Such records should identify the specific conduct which constituted each such crime (giving its specific date, time, location, and manner of criminal conduct) and give the citation to the statute which criminalized the conduct.)

REQUEST NO. 43: Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which describe with particularity, each and every act committed by the individual human being known as Jon R. Rogers, which constituted an alleged violation of the following laws:

- (a) 18 U.S.C. §1084
- (b) 18 U.S.C. §1341
- (c) 18 U.S.C. §1343
- (d) 18 U.S.C. §1955
- (e) 18 U.S.C. §1956
- (f) 18 U.S.C. §1957
- (g) Any anti-money laundering legislation of the United States, the State of Ohio, the Commonwealth of Pennsylvania and/or any state of the United States and/or any foreign sovereign nation.

REQUEST NO. 44: Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which describe with particularity, each and every transaction, deposit, withdrawal, payout, wire transfer, checking transaction or act which allegedly constituted money laundering on the part of Jon R. Rogers, personally.

REQUEST NO. 45: Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which describe with particularity, each and every transaction, in which any person deposited cash or currency into any account at any financial institution in the world, where such account was owned by Carib International and/or Fulton Data, Inc. or any other corporation (or “IBC”) with which Jon R. Rogers had any association whatsoever.

REQUEST NO. 46: Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which describe with particularity,

each and every transaction, in which any person illegally transmitted any bet or betting information to Jon R. Rogers, in violation of 18 U.S.C. §1084.

REQUEST NO. 47: INFORMANTS

- (a) Please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which identify and/or describe with particularity, any agent, informant, unindicted co-conspirator, cooperating individual or other non-police individual who supplied any information or performed any role whatsoever concerning any aspect of the United States Government's investigation of this case.
- (b) As to all such agents, informants, unindicted co-conspirators, cooperating individuals and the like, please provide true, accurate and complete copies of all records, memoranda, writings, documents and/or communications, which describe with particularity:
 - (i) Whether or not such agent or individual was suspected, apprehended, or convicted of the commission of any crime or offense at the time he or she was solicited to gather information or performed other duties on behalf of the United States Government or any other (foreign or domestic) governmental unit. Please describe all crimes to which he or she confessed or which were admitted by him or her during any debriefing, Grand Jury testimony or the like or in which they were implicated by others.
 - (ii) What crime or crimes was such individual suspected of, or apprehended for, or convicted of at the time he or she was solicited to gather or provide information on behalf of either local, state, federal, or international authorities?
 - (iii) Whether or not any potential or actual criminal charges against, or sentences of, or sanctions against, such individuals were abandoned, reduced, deferred or discontinued or otherwise mitigated or foregone upon agreement of and for the benefit of any such individual or any close friend or relative of such person or persons in exchange for their testimony and/or cooperation in this case.
 - (iv) The financial arrangements if any, which existed between said individual and/or their close friends and/or relatives and the United States Government or any foreign government.

- (v) The prior criminal records of any and all informants, unindicted co-conspirators, and cooperating individuals who were used as witnesses against Jon R. Rogers, and in preparation of search and seizure challenges, indictment, trial, pretrial motions, or the like including any and all information of any criminal activity or involvement on the part of such individuals as is known or may become known to the United States Government by the exercise of due diligence on its part.
- (vi) The substance of any plea bargains entered into by any other unnamed participants in (or witnesses to) the offenses alleged against Jon R. Rogers whose information or cooperation aided in the investigation and/or prosecution of this case and who potentially may or are intended to testify or cooperate in any way with the United States Government in this case. Please describe any plea bargain that was entered into by any Prosecutor or any governmental unit, foreign or domestic, federal, state, or local (regardless of whether or not the individual was charged including therewith).
- (vii) Any and all Orders of Assistance, plea bargains, or the like, as well as job or employment offers, agreements to forego prosecution, assistance and offers of assistance regarding prison officials, boards of parole, and probation officers, as well as offers of aid and assistance regarding sentencing, decisions to prosecute and the like insofar as they exist relative to any individual involved in this case including therewith such as they pertained to the friends, relatives and assistants to any individual participating in this case as witnesses or otherwise for the Government.
- (viii) Whether or not any such individual has ever been (or is now) a paid United States Government informant.
- (ix) As to all individuals referred to in paragraph viii above, the nature of any remuneration paid to the individual, the date it was paid, and the purpose for which it was paid.

**REQUEST NO. 48: “PROMIS” USE, OR “CARNIVORE” USE OR
INTRUSIONS**

- (a) Please produce all records, showing whether any agent or agency of the United States Government (including, without limitation, the Department of Justice and/or IRS) used computer software or computer capabilities known as “PROMIS” or “Enhanced PROMIS” or “Carnivore” in any way in connection

with the investigation of Jon R. Rogers or to manage, retrieve or store information related to Jon R. Rogers or this case?

- (b) Please produce all records, showing whether any such agent or agency ever reviewed information related to Jon R. Rogers, where a source of that information was a database which was searched by the use of said software?
- (c) Please produce all records, showing whether any such agent or agency (within the past 20 years) used said software to enter, invade, examine, retrieve, store or search banking records of banks which are located in the United States of America and/or any foreign country?
- (d) Please produce all records, showing how said software has been used in connection with this case.

REQUEST NO. 49: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 4 of the Plaintiff's Complaint, the Plaintiff alleged:

"4. The Defendant Property is forfeitable to the United States pursuant to 18 U.S.C. §§ 981 (a)(1)(A), 981 (a)(1)(C) and/or 984 since the Defendant Property was involved in transactions in violation of 18 U.S.C. §§ 1956 and/or 1957; is traceable to property involved in such violations; represents fungible proceeds under 18 U.S.C. § 984; and/or constitutes proceeds traceable to violations of 18 U.S.C. §§ 1084, 1341, and/or 1343."

Please produce all records, documents, notes, memoranda and/or writings, which describe, with particularity, the exact conduct of Jon R. Rogers by which Jon R. Rogers violated 18 U.S.C. 1956 or 1957, in connection with each such transaction. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's conduct which constituted each such violation, and then trace each such violation to the specific property which is subject to forfeiture as a result of each such violation.)

REQUEST NO. 50: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 5 of the Plaintiff's Complaint, the Plaintiff alleged:

"5. Since at least 1993 and continuing to the present, Rogers, Mowad and Thorne operated an offshore gambling business known as Carib in Antigua, Belize and the United States in violation of 18 U.S.C. §§ 1084, 1341 and/or 1343. As part of this unlawful scheme, Rogers, Mowad and Thorne established Draycott, a Florida corporation, to supply Carib with equipment and supplies needed in the unlawful business. Throughout the execution of the scheme in violation of 18 U.S.C. §§ 1084, 1341 and/or 1343, which criminal activity constitutes specified unlawful activity within the meaning of 18 U.S.C. §§ 1956 and/or 1957, Rogers, Mowad, Thorne and others, conducted numerous financial and monetary transactions in funds derived from the specified unlawful activity in violation §§ 1956 and/or 1957. "

Please produce all records, documents, notes, memoranda and/or writings, which describe, with particularity, the exact conduct of Jon R. Rogers by which Jon R. Rogers violated 18 U.S.C. 1084 or 1341 and/or 1343, as alleged. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's conduct which constituted each such violation, and then trace each such violation to the specific property which is subject to forfeiture as a result of each such violation.)

REQUEST NO. 51: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 6 of the Plaintiff's Complaint, the Plaintiff alleges:

"6. At all times relevant hereto, Rogers, Mowad and/or Thome exercised control of Carib and Draycott and of all monies and funds received and disbursed by Carib and Draycott. At all times relevant hereto, Rogers, Mowad and/or Thorne also managed and directed the employees of Carib and Draycott. The investigation revealed that all of the business activity of Carib and Draycott was conducted in violation of 18 U.S.C. §§ 1084, 1341 and/or 1343."

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, the exact conduct of Jon R. Rogers by which Jon R. Rogers exercised control of Carib and Draycott, as alleged. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's conduct which constituted each such act of control, and then trace each such act of control to the specific property which is subject to forfeiture as a result of each such act.)

REQUEST NO. 52: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 6 of the Plaintiff's Complaint, the Plaintiff alleges:

"6. At all times relevant hereto, Rogers, Mowad and/or Thome exercised control of Carib and Draycott and of all monies and funds received and disbursed by Carib and Draycott. At all times relevant hereto, Rogers, Mowad and/or Thorne also managed and directed the employees of Carib and Draycott. The investigation revealed that all of the business activity of Carib and Draycott was conducted in violation of 18 U.S.C. §§ 1084, 1341 and/or 1343."

Please produce all records, documents, notes, memoranda and/or writings, which describe, with particularity, the exact conduct of Jon R. Rogers by which Jon R. Rogers managed and directed the employees of Carib and Draycott, as alleged. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Roger's conduct which constituted each such act of management and/or direction, and give the name and address of each employee of Carib and/or Draycott who was managed and/or directed by Jon R. Rogers.)

REQUEST NO. 53: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court,

Western District of Pennsylvania, at paragraph 7 of the Plaintiff's Complaint, the Plaintiff alleges:

"7. Since at least 1993 and continuing to the present, Rogers, Mowad, Thorne, Carib, Draycott and others accepted wagers on sporting events from bettors located in the United States using the Internet and/or telephone systems, which are wire communications facilities pursuant to 18 U.S.C. § 1084. Rogers, Mowad, Thorne, and/or Carib employees under their direction and control and while physically located in Antigua and/or Belize, knowingly accepted wagers in interstate and foreign commerce from persons physically located in states within the United States where sports gambling is prohibited by law, including in the Commonwealth of Pennsylvania."

Please produce all records, documents, notes, memoranda and/or writings, which describe, with particularity, each wager which was accepted by Jon R. Rogers, personally, and describe the exact conduct of Jon R. Rogers by which Jon R. Rogers accepted each such wager, as alleged. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's conduct which constituted each such act of acceptance of a wager, and give the name and address of each bettor who placed such wager from a location in the United States.)

REQUEST NO. 54: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 8 of the Plaintiff's Complaint, the Plaintiff alleges:

"8. As part of this unlawful scheme in violation of 18 U.S.C. §§ 1084, 1341 and/or 1343, Rogers, Mowad, Thorne, and/or Carib employees under their direction and control, and while physically located in Antigua and/or Belize, accepted millions of dollars in wagers each year. The majority of these wagers come from bettors within the United States. As part of this unlawful scheme, Rogers, Mowad and/or Thorne managed and directed the offshore gambling activities of Carib from locations within the United States by utilizing telephone and electronic communications. They also accepted wagers from individual within the United States via the telephone and the Internet."

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he managed and directed the offshore gambling activities from a location within the United States, as alleged. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's conduct which constituted each such act of management and/or direction of offshore gambling activities, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 55: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court,

Western District of Pennsylvania, at paragraph 9 of the Plaintiff's Complaint, the Plaintiff alleges:

"9. As part of this unlawful scheme in violation of 18 U.S.C. §§ 1084, 1341 and/or 1343, Rogers, Mowad, Thorne, and/or Carib employees under their direction and control, solicited bettors in the United States by advertising, via direct mailings, sports publications and on the Internet to United States' residents and citizens."

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he solicited any bettor or bettors, as alleged. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's conduct which constituted each such act of solicitation, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 56: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 10 of the Plaintiff's Complaint, the Plaintiff alleges:

"10. As part of this scheme in violation of 18 U.S.C. §§ 1084, 1341 and/or 1343, Rogers, Mowad, Thorne, Carib, Draycott and/or others generated millions of dollars of illegal proceeds. Rogers, Mowad and/or Thorne also utilized their positions as principals of Carib and Draycott to divert millions of dollars from Carib and Draycott for their own financial benefit in violation of 18 U.S.C. §§ 1956 and/or 1957."

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he generated each asset which is subject to forfeiture in this case, as alleged. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's conduct which generated each such asset, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 57: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 11 of the Plaintiff's Complaint, the Plaintiff alleges:

"11. Rogers, Mowad, and/or Thome, arranged these transactions by writing checks or transferring funds by wire, or by directing subordinate employees to do so, from various Carib and Draycott accounts to accounts owned and controlled by them or their family members."

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he wrote a check or transferred funds by wire, and trace each such check or wire transfer to a specific asset which is subject to forfeiture in this case. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers's writing of each such check or wire-transferring of funds, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 58: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 12 of the Plaintiff’s Complaint, the Plaintiff alleges:

“12. The investigation revealed that Rogers, and/or others under his direction and control, made the following deposit of proceeds from the unlawful scheme into defendant account number 9263-99321-01 at American Funds-Washington Mutual Investors Fund in , violation of 18 U.S.C. §§ 1956 and/or 1957:

Date 05/31/01

Amount \$236,775.00 The \$236,775.00 in illegal proceeds was transferred into defendant account number 9263-99321- 01 from a foreign bank. There have been no other deposits or withdrawals from this account since the \$236,775.00 deposit on May 31, 2001. The investigation revealed no legitimate source of monies for Rogers.”

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he unlawfully earned or generated such \$236,775.00 prior to its deposit into Account Number 9263-99321-01. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which earned or generated such funds , and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 59: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 13 of the Plaintiff’s Complaint, the Plaintiff alleges:

“13.The investigation revealed that Rogers, and/or others under his direction and control, made the following deposits of proceeds from the unlawful scheme into defendant account number 150-900223 at Ameritrade in violation of 18 U.S.C. §§ 1956 and/or 1957:

<u>Date</u>	<u>Amount</u>
06/04/98	\$50,000.00
02/23/99	\$51,000.00
09/29/99	\$100,000.00
09/19/01	\$200,000.00
07/12/02	\$250,000.00

The illegal proceeds outlined above were transferred into defendant account number 150-900223 from foreign banks. There have been no other deposits into defendant account number 150-900223 after the \$250,000.00 deposit on July 12, 2002. The investigation revealed no legitimate source of monies for Rogers.”

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he unlawfully earned or generated such proceeds prior to their deposit into Account Number 150-900223 at Ameritrade. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which earned or generated such proceeds, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 60: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 14 of the Plaintiff’s Complaint, the Plaintiff alleges:

“14. The investigation revealed that Rogers, and/or others under his direction and control, made the following deposits of proceeds from the unlawful scheme into defendant account number 610232-281-2 at Citizens Bank (formerly known as account number 371-6928 at Mellon Bank) in violation of 18 U.S.C. §§ 1956 and/or 1957:

Date	Amount
10/22/01	\$48,620.00
10/27/01	\$150,000.00
08/29/02	\$249,950.00
12/12/02	\$249,950.00
01/21/03	\$249,950.00

The three transfers of \$249,950.00 originated from foreign Carib accounts. The investigation also revealed that on May 22, 2003, defendant account number 610232-281-2 received a wire transfer of \$253,196.23. The investigation revealed no legitimate source of monies for Rogers. “

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he unlawfully earned or generated such proceeds prior to their deposit into Account Number 610232-281-2 at Mellon Bank. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which earned or generated such proceeds, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 61: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 16 of the Plaintiff’s Complaint, the Plaintiff alleges:

16. The investigation revealed that Rogers, and/or others under his direction and control, made the following deposits of proceeds from the unlawful scheme into three

certificates of deposit at Sky Bank in violation of 18 U.S.C. §§ 1956 and/or 1957, which certificates of deposit have been rolled over into the defendant certificate of deposit account numbers 3801070689, 3801314537 and 3801314499:

<u>Date</u>	<u>Amount</u>
02/14/00	\$250,000.00
04/24/01	\$373,171.00
07/19/01	\$190,085.00
08/27/01	\$378,702.00

The investigation revealed no legitimate source of monies for Rogers. “

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he unlawfully earned or generated such proceeds prior to their deposit into Account Numbers 3801070689, 3801314537 and 3801314499 at Sky Bank. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which earned or generated such proceeds, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 62: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 17 of the Plaintiff’s Complaint, the Plaintiff alleges:

“17. The investigation revealed that Rogers, Mowad and/or Thorne, and/or others under their direction and control, made the following deposits of proceeds from the unlawful scheme into account number 2000013863452 at First Union National Bank (Wachovia Bank NA) in violation of 18 U.S.C. §§ 1956 and/or 1957:

<u>Date</u>	<u>Amount</u>
03/22/02	\$71,938.00
05/01/02	\$36,886.89
05/29/02	\$35,374.00
06/25/02	\$47,111.57
07/03/02	\$44,083.04
07/30/02	\$37,500.00
08/13/02	\$46,452.76
09/05/02	\$54,726.88
10/03/02	\$45,356.31
11/04/02	\$102,070.86
11/27/02	\$60,917.29
12/09/02	\$77,036.30
12/18/02	\$69,336.45

The investigation revealed no legitimate source of monies for Rogers.”

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, by which he unlawfully earned or generated such proceeds prior to their deposit into Account Number 2000013863452 at First Union National Bank (Wachovia Bank NA). (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which earned or generated such proceeds, and give the name and address of each eyewitness who observed such conduct.)

REQUEST NO. 63: In that certain case, styled *United States of America vs. Various Accounts in the Names of Jon R. Rogers, et al*, Case No. 03-815, in the Federal District Court, Western District of Pennsylvania, at paragraph 19 of the Plaintiff’s Complaint, the Plaintiff alleges:

“19. Based upon the foregoing, the Defendant Property is forfeitable to the United States pursuant to 18 U.S.C. §§ 981 (a)(1)(A), 981(a)(1)(C) and/or 984 since the Defendant Property was involved in transactions in violation of 18 U.S.C. §§ 1956 and/or 1957; is traceable to property involved in such violations; represents fungible proceeds under 18 U.S.C. § 984; and/or constitutes proceeds traceable to violations of 18 U.S.C. §§ 1084, 1341, and/or 1343. “

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, which caused each item of property to be “forfeitable to the United States” pursuant to 18 U.S.C. 981. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which caused each such item to be “forfeitable”, and give the name and address of each eyewitness who observed such conduct. For each particular item of property, specify which particular act of Jon R. Rogers caused that particular item to be “forfeitable.”)

REQUEST NO. 64: In that certain case, styled *United States of America vs. \$1,660,800.00 in United States Currency, \$122,400.00 in One Ounce Gold Coins, and One 100 Ounce Silver Block*, , Case No. 03-1157, in the Federal District Court, Western District of Pennsylvania, at paragraph 1 of the Plaintiff’s Complaint, the Plaintiff alleges:

“1. Pursuant to 18 U.S.C. §§ 981(a)(1)(A) and/or 981(a)(1)(C), Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of the following (hereinafter collectively the Defendant Property):

- a. \$3,700.00 in United States currency seized by the United States on June 3, 2003 pursuant to a federal search warrant from the residence of Jon R. Rogers (Rogers) located at 1324 Dennis Way, Toronto, Ohio 43964.
- b. \$45,000.00 in United States currency seized by the United States on June 3, 2003 pursuant to a federal search warrant from Rogers’ warehouse located at 1312 Dennis Way, Toronto, Ohio 43964.
- c. A 100 oz. silver rectangular block seized by the United States on June 3, 2003 pursuant to a federal search warrant from Rogers’ warehouse located at 1312

Dennis Way, Toronto, Ohio 43964.

- d. \$112,100.00 in United States currency seized by the United States on June 3, 2003 pursuant to a federal search warrant from the residence of John A. Thorne (Thorne) located at 4356 Outrigger Lane, Tampa, Florida 33615.
- e. \$400,000.00 in United States currency seized by the United States on June 4, 2003 pursuant to a federal search warrant from Safe Deposit Box Number 73 in the name of Rogers at National City Bank, 120 North Forth Street, Location 14-1304, Toronto, Ohio 43964.
- f. \$400,000.00 in United States currency seized by the United States on June 4, 2003 pursuant to a federal search warrant from Safe Deposit Box Number 867 in the name of Rogers at Sky Bank, 4th and Main Streets, Branch 153, Toronto, Ohio 43964.
- g. 360 one ounce gold coins seized by the United States on June 4, 2003 pursuant to a federal search warrant from Safe Deposit Box Number 2013 in the name of Rogers at Citizens Bank, 6400 Steubenville Pike, Pittsburgh, PA 15205.
- h. \$700,000.00 in United States currency seized by the United States on June 4, 2003 pursuant to a federal search warrant from Safe Deposit Box Number 2013 in the name of Rogers at Citizens Bank, 6400 Steubenville Pike, Pittsburgh, PA 15205.

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, which caused each item of property (described in a through h, above) to be “forfeitable to the United States” pursuant to 18 U.S.C. 981. (In so doing, please provide records which give the date, time, location, manner and method of the Claimant’s conduct which caused each such item to be “forfeitable”, and give the name and address of each eyewitness who observed such conduct. For each particular item of property, specify which particular act of Jon R. Rogers caused that particular item to be “forfeitable.”)

REQUEST NO. 65: In that certain case, styled *United States of America vs. Various Accounts in the Name of Carib International Ltd., et al.*, , Case No. 04-353, in the Federal District Court, Western District of Pennsylvania, at Attachment A of the Plaintiff’s Complaint, the Plaintiff alleges:

“ATTACHMENT A

The following bank accounts are subject to forfeiture in this case:

Provident Bank & Trust of Belize, Ltd.

- a. Carib International Ltd. Account no. 700498
- b. William J. Ceasar Enterprises Ltd. Account no. 700931
- c. Fulton Data Processing, Ltd. Account no. 700945
- d. Data Tech 2000 Ltd. Account no. 700933

e. World Lubricants, Ltd. -Account no. 700932
f. Peter Mowad~ Account no. 500111
g. John A. Thorne, Account no. 500110
h. Jon R. Rogers, Account no. 500168
which can be located in the following interbank

accounts:

- (1) BAC Florida Bank, 169 Miracle Mile, 8th Floor, Coral Gables, Florida, 33134, Account Number 30860830;
- (2) International Bank of Miami, N.A., 121 Alhammbra Circle, 15th Floor, Coral Gables, Florida 33134, Account Number 99001188006; and,
- (3) ABN AMRO Bank, N.V. 55 East 52nd Street, New York, New York, 10055 Account Number 574062578741

Atlantic International Bank of Belize

- a. Fulton Data Processing Ltd. 100-000-348
 - b. Data Tech 2000 Ltd. 100-000-339
 - c. Carib International Ltd. 100-0QO-428
 - d. World Lubricants, Ltd. 100-000-482
- which can be located in the following interbank

accounts:

- (1) International Bank of Miami, N.A., 121 Alhammbra Circle, 15th Floor, Coral Gables, Florida 33134, account number is 99000578306.”

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, which caused each item of property (described in the above-referenced Attachment A) to be “forfeitable to the United States” pursuant to 18 U.S.C. 981. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which caused each such item to be “forfeitable”, and give the name and address of each eyewitness who observed such conduct. For each particular item of property, specify which particular act of Jon R. Rogers caused that particular item to be “forfeitable.”)

REQUEST NO. 66: In that certain case, styled *United States of America vs. Various Accounts in the Name of Jon R. Rogers*, , Case No. 04-838, in the Federal District Court, Western District of Pennsylvania, at Paragraph 1 of the Plaintiff’s Complaint, the Plaintiff alleges:

“1. Pursuant to 18 U.S.C. §§ 981(a)(1)(A), 981(a)(I)(C) and 984, Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of the following accounts and fixed contract (hereinafter collectively the Defendant Property) in the name of Jon R. Rogers (Rogers):

a. All monies contained in account numbers 47419100, 55031299, 083309-001 and 083309-003 at Barclays Bank Finance Company (Jersey) Limited (Barclays Bank), P.O. Box 191,29/31 The Esplande, St. Helier, Jersey, JE4 8RN; and

b. All monies contained in fixed contract number 16518732 and account number 5893- 54701820 at the Royal Bank of Scotland, International Offshore Banking

Centre, P.O. Box 678, 59-63 Bath Street, St. Helier, Jersey, JE4 8PJ.”

Please produce all records, documents, notes, memoranda and/or writings which describe, with particularity, each act of Jon R. Rogers, personally, which caused each item of property (described in the above-referenced Paragraph 1 of the Plaintiff’s Complaint) to be “forfeitable to the United States” pursuant to 18 U.S.C. 981. (In so doing, please provide records which give the date, time, location, manner and method of Jon R. Rogers’s conduct which caused each such item to be “forfeitable”, and give the name and address of each eyewitness who observed such conduct. For each particular item of property, specify which particular act of Jon R. Rogers caused that particular item to be “forfeitable.”)

REQUEST NO. 67: CHARNEY AND WINER MEETING WITH HURST AND MCALLISTER

Please produce all records, documents, notes, memoranda and/or writings which show whether Scott Charney and/or Jonathan Winer met with Lionel Hurst (Antigua’s then-Ambassador to the United States) and/or Gyneth McAllister (Antigua’s then-Director-Free Trade and Processing Zone), in Washington, D.C. in August of 1997? (Please provide all records which give the following information:

- (a) The topic of all conversations and communications which occurred between or among Lionel Hurst (Antigua’s then-Ambassador to the United States) and Scott Charney (of the White House and/or Department of Justice) in Washington, D.C. in August of 1997.
- (b) The topic of all conversations and communications which occurred between or among Lionel Hurst (Antigua’s then-Ambassador to the United States) and Jonathan Winer (of the Department of State of the United States) in Washington, D.C. in August of 1997.
- (c) The topic of all conversations and communications which occurred between or among Gyneth McAllister (Antigua’s Director-Free Trade and Processing Zone) and Scott Charney (of the White House and Department of Justice) in Washington, D.C. in August of 1997.
- (d) The topic of all conversations and communications which occurred between or among Gyneth McAllister (Antigua’s Director-Free Trade and Processing Zone) and Jonathan Winer (of the Department of State of the United States) in Washington, D.C. in August of 1997.
- (e) The topic of all communication to or from Gyneth McAllister to or from any employee or agent of the U.S. Government from August 1, 1997 to the date of answering of these Interrogatories.

REQUEST NO. 68: MCALLISTER AS INFORMANT

Please produce all records, documents, notes, memoranda and/or writings which show whether Gyneth McAllister, at any time, acted as an informant or witness who has given information to the United States Government during the United States Government's investigation of this case and/or investigation of the conduct of Jon R. Rogers? (If so, please provide all records which describe the manner and method by which Gyneth McAllister acted as an informant or witness and describe the information which she provided to the Plaintiff.)

REQUEST NO. 69: STEVE KAUFMAN'S REPORT TO DOJ RE SETTLEMENT

Please produce a true, accurate and complete copy of every report that Steve Kaufman [Assistant United States Attorney-Western District of Pennsylvania] authored or sent to any employee of the Department of Justice in October of 2011, the subject of which was a proposed settlement of the Civil Forfeiture Cases.

REQUEST NO. 70: TINA MILLER'S CORRESPONDENCE WITH DOJ RE SETTLEMENT

Please produce a true, accurate and complete copy of every report, letter, email or other writing authored by Tina Miller [Assistant United States Attorney-Western District of Pennsylvania] in the years 2009, 2010, and/or 2011, the subject of which was a proposed settlement of the Civil Forfeiture Cases.

REQUEST NO. 71: MARY HOUGHTON'S CORRESPONDENCE WITH DOJ RE SETTLEMENT

Please produce a true, accurate and complete copy of every report, letter, email or other writing authored by Mary Houghton [Assistant United States Attorney-Western District of Pennsylvania] in the years 2009, 2010, and/or 2011, the subject of which was a proposed settlement of the Civil Forfeiture Cases.

The undersigned Jon R. Rogers is seeking records related to himself; therefore, he is required to verify his identity. This verification is required in order to protect his privacy and to ensure that private information about him is not disclosed inappropriately to someone else. Therefore, Jon R. Rogers is providing the attached notarized statement and statement signed under penalty of perjury stating that he is the person who he says he is. Jon R. Rogers is fulfilling this requirement by (1) completing and signing **Form DOJ-361** [enclosed] and by (2) having his signature on this request letter witnessed by a notary, and by (3) including the following statement immediately above the signature on this request letter: "I declare under penalty of perjury that the foregoing is true and correct. Executed on [date]."

This request for information is made under the Federal Freedom of Information Act (5 U.S.C. §552) and the Federal Privacy Act (5 U.S.C. §552[a]) and the Ohio Public Records Disclosure Act (Chapter 149 Ohio Revised Code).

This request is directed to a "public office" and "public official" within the meaning of R.C. 149.01.1 and it constitutes a request for "records" (including records which are "archived"), as defined by R.C. 149.01.1(F) and (G). This request is for "public records" as defined by R.C. 149.43.

R.C. 149.43(B)(1) authorizes this request and provides that the records shall be promptly prepared and made available by the public office and person responsible for the records. It also requires that a public office shall maintain the records in a manner in which they may be made available for inspection.

R.C. 149.43(B)(3) requires the public office/person to transmit a copy of the record after receiving this request. Failure to do so entitles the aggrieved person to the remedy of mandamus pursuant to R.C. 149.43(C).

Thank you.

Sincerely,



JON R. ROGERS

State of Ohio
County of Jefferson:

I declare under penalty of perjury that the following Certification is true and correct.

EXECUTED ON THE 29th DAY OF NOVEMBER, 2012.



JON R. ROGERS

Sworn before me a notary public in and for said county and state , and subscribed in my presence, by Jon R. Rogers [a person known to me], this 29th day of November, 2012.

FRANK J. BRUZZESE Attorney At Law
Notary Public - State of Ohio at Large
My Commission has no expiration date
Sec. 147.03 Ohio R.C.



NOTARY PUBLIC

U.S. Department of Justice

Certification of Identity

FORM APPROVED OMB NO. 103-0046
EXPIRES 10/31/13

Privacy Act Statement. In accordance with 28 CFR Section 16.41(d) personal data sufficient to identify the individuals submitting requests by mail under the Privacy Act of 1974, 5 U.S.C. Section 552a, is required. The purpose of this solicitation is to ensure that the records of individuals who are the subject of U.S. Department of Justice systems of records are not wrongfully disclosed by the Department. Requests will not be processed if this information is not furnished. False information on this form may subject the requester to criminal penalties under 18 U.S.C. Section 1001 and/or 5 U.S.C. Section 552a(i)(3).

Public reporting burden for this collection of information is estimated to average 0.50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Suggestions for reducing this burden may be submitted to the Office of Information and Regulatory Affairs, Office of Management and Budget, Public Use Reports Project (1103-0016), Washington, DC 20503.

Full Name of Requester ¹ Jon Robert Rogers
 Citizenship Status ² Citizen of USA Social Security Number ³ 273-56-4567
 Current Address 12 Cara Place
 Date of Birth 11/04/58 Place of Birth Steubenville OH

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am the person named above, and I understand that any falsification of this statement is punishable under the provisions of 18 U.S.C. Section 1001 by a fine of not more than \$10,000 or by imprisonment of not more than five years or both, and that requesting or obtaining any record(s) under false pretenses is punishable under the provisions of 5 U.S.C. 552a(i)(3) by a fine of not more than \$5,000.

Signature ⁴ Jon Robert Rogers Date 11-29-12

OPTIONAL: Authorization to Release Information to Another Person

This form is also to be completed by a requester who is authorizing information relating to himself or herself to be released to another person.

Further, pursuant to 5 U.S.C. Section 552a(b), I authorize the U.S. Department of Justice to release any and all information relating to me to:

Print or Type Name

¹ Name of individual who is the subject of the record(s) sought.

² Individual submitting a request under the Privacy Act of 1974 must be either "a citizen of the United States or an alien lawfully admitted for permanent residence," pursuant to 5 U.S.C. Section 552a(a)(2). Requests will be processed as Freedom of Information Act requests pursuant to 5 U.S.C. Section 552, rather than Privacy Act requests, for individuals who are not United States citizens or aliens lawfully admitted for permanent residence.

³ Providing your social security number is voluntary. You are asked to provide your social security number only to facilitate the identification of records relating to you. Without your social security number, the Department may be unable to locate any or all records pertaining to you.

⁴ Signature of individual who is the subject of the record sought.

FORM DOJ-361

RECEIPT

7193 2954 3570 0000 0337

FROM:

Bruzzese & Calabria
RE:

SEND TO:

Internal Revenue Service
Disclosure Scanning Operation - S
Post Office Box 621506
Attention: Public Liaison: Ava Little
Atlanta GA 30362-3006

FEES:

Postage	0.33
Certified Fee	1.40
Special Restricted Receipt	1.25

TOTAL \$ 2.98

POSTMARK OR DATE

RECEIPT

7193 2954 3570 0000 0344

FROM:

Bruzzese & Calabria
RE:

SEND TO:

U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Office of the Assistant Attorney General
Washington DC 20530

FEES:

Postage	0.33
Certified Fee	1.40
Special Restricted Receipt	1.25

TOTAL \$ 2.98

POSTMARK OR DATE

RECEIPT

7193 2954 3570 0000 0351

FROM:

Bruzzese & Calabria
RE:

SEND TO:

FBI Pittsburgh
3311 East Carson Street
Attention: Public Liaison
Attention: Disclosure Officer
Pittsburgh PA 15203

FEES:

Postage	0.33
Certified Fee	1.40
Special Restricted Receipt	1.25

TOTAL \$ 2.98

POSTMARK OR DATE

*** FAX MULTI TX REPORT ***

JOB NO. 2408
PGS. 37

TX INCOMPLETE -----
TRANSACTION OK 12025140293
12023072572
14124324188
ERROR 12023072839
14126442726

**JON R. ROGERS
12 CARA PLACE
STEUBENVILLE, OHIO 43953**

November 29, 2012

Internal Revenue Service
Disclosure Scanning Operation – Stop 93A
Post Office Box 621506
Atlanta, GA 30362-3006

Attention: **Public Liaison: Ava Littlejohn**
Attention: **Disclosure Officer**
VIA: **FAX @**
VIA: **ORDINARY MAIL**
VIA: **CERTIFIED MAIL**

Federal Bureau of Investigation
Record Information/Dissemination Section
170 Marcel Drive
Winchester, VA 22602-4843

FOIA/PA Mail Referral Unit
Department of Justice
LOC Building
Washington, DC 20530-0001

U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Office of the Assistant Attorney General
Main
Washington, DC 20530

VIA: **FAX @ (202) 514-0293 and (202) 307 3570**

FBI Pittsburgh
3311 East Carson Street
Pittsburgh, PA 51203

Attention: **Public Liaison**
Attention: **Disclosure Officer**
VIA: **FAX @ (412) 432-4188**
VIA: **ORDINARY MAIL**
VIA: **CERTIFIED MAIL**

United States Attorney
U.S. Department of Justice
633 United States Post Office and Courthouse
Pittsburgh, PA 15219

VIA: **FAX @ (412) 644-2726**
VIA: **ORDINARY MAIL**