

Rick V. Haas
Custodian of Records
Experian Consumer Affairs

701 Experian Parkway
Allen, Texas 75013
[REDACTED]
www.experian.com





P.O. Box 1240
Allen, TX 75013
www.experian.com

September 16, 2019

[REDACTED]
United States Attorney's Office
One Saint Andrew's Plaza
New York, NY 10007

**RE: Subpoena for the credit records of [REDACTED], et al.
Experian's Ref. # 149544595**

Dear AUSA [REDACTED]:

We are unable to locate credit records for [REDACTED] and Tova A. Noel at this time. **No record was found for Tova A. Noel using the information provided and additional identification information is need to pull records on [REDACTED]**

Our database is a unique system in which full identification must be input in order to retrieve a credit profile on a particular individual. To ensure a complete credit profile, Experian uses full name, including middle name and generation code (Sr., Jr. I,II,III, etc.), current address including zip code, previous addresses for the past two years including zip codes, social security number, and date of birth. **Please provide in writing, any additional identification information for these individuals and a copy of the subpoena within 30 days and we will process your request.**

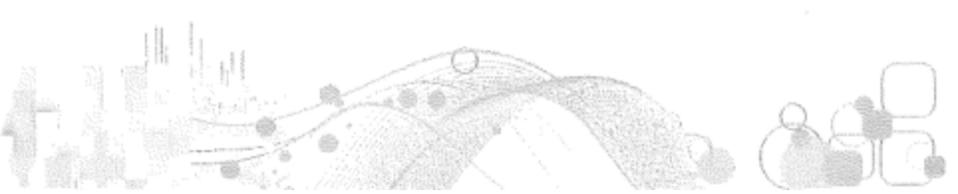
Enclosed please find the record for Michael A. Thomas.

If I may be of further assistance, please do not hesitate to contact me at the number listed below.

Sincerely,

Rick V. Haas
Custodian of Records
Experian Consumer Affairs
[REDACTED]

Enclosures



United States District Court
SOUTHERN DISTRICT OF NEW YORK

TO: Experian
Consumer Affairs Special Services
Attention: Rick Haas, Custodian of Records
701 Experian Parkway
Allen, TX 75013

GREETINGS:

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Room 220, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: September 13, 2019 Appearance Time: 9:00 a.m.

to testify and give evidence in regard to alleged violation of:
18 U.S.C. §§ 1791, 201.

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:

Please see the attached rider. Personal appearance is not required if the requested records are (1) produced on or before the return date to AUSA [REDACTED], and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records.

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York
August 30, 2019

Geoffrey S. Berman / kd
GEOFFREY S. BERMAN
United States Attorney



Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Telephone: [REDACTED]
Email: [REDACTED]



RIDER

(Grand Jury Subpoena to Experian, dated August 30, 2019; USAO 2019R01059)

REQUEST:

Please provide all financial account information, including credit reports, relating to the following individuals:

- [REDACTED]
- Tova A. Noel, [REDACTED]
- Michael A. Thomas, [REDACTED]

In lieu of an appearance you may comply with this subpoena by providing the requested information, along with a business records certification pursuant to Fed. R. Evid. 803(6) to AUSA [REDACTED]

[REDACTED]

Declaration of Custodian of Records

Pursuant to 28 U.S.C. § 1746, I, the undersigned, hereby declare:

My name is Rick V. Haas
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration.

I am in receipt of a Grand Jury Subpoena, dated August 30, 2019, and signed by Assistant United States Attorney [REDACTED] requesting specified records of the business named below. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records provided herewith and in response to the Subpoena:

- (1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;
- (2) were kept in the course of regularly conducted business activity; and
- (3) were made by the regularly conducted business activity as a regular practice.

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

Executed on 9-16-19
(date)

Rick V. Haas
(signature of declarant)
custodian of Records
(name and title of declarant)
Expeman
(name of business)
701 Expeman Parkway
(business address)
Allen TX 75013

Definitions of terms used above:

As defined in Fed. R. Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed. R. Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.