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8 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
9 IN AND FOR THE COUNTY OF MARICOPA

10 PETER S. DAVIS, as Receiver of
DENSCO INVESTMENT
CORPORATION, an Arizona corporation,

11 Plaintiff,

12 v.

13 U.S. BANK, NA, a national banking
organization; HILDA H. CHAVEZ and
14 JOHN DOE CHAVEZ, a married couple;
15 JP MORGAN CHASE BANK, N.A., a
national banking organization;
16 SAMANTHA NELSON f/k/a
SAMANTHA KUMBALECK and
17 KRISTOFER NELSON, a married couple;
and VIKRAM DADLANI and JANE DOE
18 DADLANI, a married couple.

19 Defendants.

No. CV2019-011499

**THE U.S. BANK DEFENDANTS’
SECOND SUPPLEMENTAL
RESPONSES TO DENSCO
INVESTMENT CORPORATION
SECOND SET OF REQUESTS FOR
PRODUCTION**

(Assigned to the Hon. Daniel Martin)

20 Defendant U.S. Bank National Association (“U.S. Bank”) submits this Second
21 Supplemental Response to DenSco Investment Corporation Second Set of Requests for
22 Production. **Supplementation is in bold.**

23 **REQUESTS FOR PRODUCTION**

24 **REQUEST FOR PRODUCTION NO. 12:**

25 Any documents relating to the training of tellers as to when to make unusual activity
26 or suspicious activity reports, including policies and procedures. In addition, provide a
27 schedule of all branch training courses completed by branch personnel at the branches
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1 identified in the Third Amended Complaint during the relevant period. This schedule
2 should include courses, attendees and dates of attendance for each respective branch.

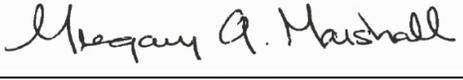
3 **RESPONSE:**

4 U.S. Bank objects on the following grounds: (1) the request is not relevant to any
5 claim or defense and disproportionate to the needs of the case; (2) the request assumes facts
6 that are not correct, including that tellers submit suspicious activity reports as that term is
7 defined in the Bank Secrecy Act; (3) the request is vague and ambiguous in that it fails to
8 define phrases such as “unusual activity,” “suspicious activity reports” (to the extent this
9 phrase is intended to refer to something other than a SAR as referenced in the Bank Secrecy
10 Act), and “branch training courses;” (4) the request is overbroad in scope, because it seeks
11 “any documents” relating to the above-referenced training, a schedule of “all branch
12 training courses,” and policies and procedures beyond the subject matter of the TAC,
13 beyond the employees involved in the U.S. Bank transactions at issue, and beyond U.S
14 Bank’s involvement in this case; (5) the request is overbroad in duration as it seeks
15 documents for timeframes that have no relevance to any claim or defense as to U.S. Bank;
16 and (6) to the extent DenSco seeks attorney-client or work product protected documents,
17 U.S. Bank objects and declines to produce such documents. Subject to these objections,
18 and following a reasonable inquiry, U.S. Bank identifies the following training materials
19 that address internal referrals by branch personnel for further investigation effective
20 between January and April 2014: Anti-Money Laundering: Southwest Boarder Employees
21 2014 (USB_DENSCO001090-1137) (Highly Confidential – Subject to Protective Order);
22 **Suspicious Activity Reporting 2013 Offline Version (USB_DENSCO001173-1217)**
23 **(Highly Confidential – Subject to Protective Order); AML Southwest Border**
24 **Branches Training (USB_DENSCO001218-1267) (Highly Confidential – Subject to**
25 **Protective Order); Corporate Compliance Course Storyboard-Anti-Money**
26 **Laundering 2013 (USB_DENSCO001268-1301) (Highly Confidential – Subject to**
27 **Protective Order).**
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DATED this 20th day of October, 2021.

SNELL & WILMER L.L.P.

By: 

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CERTIFICATE OF SERVICE

The foregoing was served via e-mail on the following parties this 20th day of October, 2021.

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