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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN THE COUNTY OF MARICOPA**

Peter S. Davis, as Receiver of DenSco  
Investment Corporation, an Arizona  
corporation,

Plaintiff,

v.

U.S. Bank, NA, a national banking  
organization; Hilda H. Chavez and John  
Doe Chavez, a married couple; JPMorgan  
Chase Bank, N.A., a national banking  
organization; Samantha Nelson f/k/a  
Samantha Kumbalek and Kristofer Nelson,  
a married couple; and Vikram Dadlani and  
Jane Doe Dadlani, a married couple,

Defendants

No. CV2019-011499

**PLAINTIFF'S FOURTH  
SUPPLEMENTAL RULE 26.1  
DISCLOSURE STATEMENT**

For its Fourth Supplemental Disclosure Statement, Plaintiff Peter S. Davis, as  
Receiver of DenSco Investment Corporation, sets forth the following:

**VIII. EXHIBITS**

Plaintiff has not yet determined what exhibits it will use at trial and will  
supplement accordingly.

1 Plaintiff reserves the right to use any document that is set forth in Section IX  
2 below.

3 Plaintiff did prepare an exhibit list for trial in the Clark Hill case. The Clark Hill  
4 exhibit list was attached to Plaintiff's First Supplemental Disclosure Statement.

5 On April 29, 2021, US Bank counsel in a letter stated that this disclosure "does  
6 not suffice under the Rule." Plaintiff disagrees. Plaintiff disclosed and incorporated  
7 into its Supplemental Rule 26.1 statements the **trial exhibit list** prepared in the Clark  
8 Hill case, which lists 1332 trial exhibits, including Chittick documents and Receiver  
9 documents as to the Menaged frauds. Plaintiff attaches in a disc, copies of these  
10 documents listed in the Clark Hill trial exhibit list. All of the documents listed are  
11 subject to disclosure in this case, and, at an appropriate time, some categories and  
12 documents on this list will be designated as trial exhibits in this case.

13 In its Second Supplemental Disclosure, Plaintiff produced lists to Defendants of  
14 the certified checks from US Bank and Chase Bank that were the subject matter of the  
15 second Menaged fraud. These lists will be marked as trial exhibits, and along with the  
16 certified checks, withdrawal and deposit slips associated with them will also be listed.  
17 Plaintiff is compiling this information from documents produced by the Banks to the  
18 Receiver prior to this lawsuit being filed. US Bank's withdrawal and deposit slips, loan  
19 files and trustee receipts are included in the disc as Vol.004 (Bates **R-002766-003261**).

20 DenSco maintained loan files on each of the properties that are the subject of the  
21 Menaged second fraud. These loan files will be trial exhibits and are in the document  
22 depository.

23 Bank of America produced documents to the Receiver. The Receiver produced  
24 a report formatted on an Excel spreadsheet containing a summary of the investigation  
25 and closure of the DenSco accounts. Further discovery has been issued against Bank  
26 of America. Summaries and results of their investigation may be listed as trial exhibits.

27 Plaintiff has asked Defendants to produce the following documents under Rule  
28 26.1:

- (1) Organizational charts for the branch offices where Menaged and his staff procured cashier's checks during the relevant time period of the Third Amended Complaint.
- (2) Identify the names of tellers and other bank employees who handled the paperwork of issuing cashier's checks, preparing or accepting withdrawal and deposit slips, or otherwise assisting Menaged and his staff in these transactions, or who were aware of the transactions.
- (3) Internal emails and communications internal to the Bank regarding Menaged, his staff, like Veronica Castro, or his business entities and personal and business accounts.
- (4) Emails and communications between the Banks and Menaged, his staff, like Veronica Castro, or businesses.
- (5) The Banks' document retention policies.
- (6) Organizational charts for any department of the Bank responsible for compliance, fraud detection, money laundering detection or any other function directed to uncovering crime or fraud during the relevant time period of the Third Amended Complaint.
- (7) Identify any employees involved in any investigation involving Menaged and/or his business entities pertaining to the use of his bank accounts with your institution.
- (8) Any investigation or audit conducted by the Bank on Menaged or his staff, like Veronica Castro, or his business and affiliated entities. In particular, provide all compliance exception reports which were generated as a result of activity in any/all Menaged-related bank accounts during the period identified in the Third Amended Complaint, as well as the disposition status of any such exception investigations.
- (9) All policies and procedures regarding the issuance of cashier's checks, cashier's checks not used for their intended purpose, the listing of a remitter on the cashier's checks, and the noting of the purposes of the cashier's checks during the relevant time of the Third Amended Complaint.
- (10) All policies and procedures regarding reporting of unusual activities or suspicious activities internally within the bank; all policies and procedures for how any unusual activities report or suspicious activities report are to be handled within the bank and to whom such activities are reported. In particular, provide policies, procedures and training materials covering "red flag" identification and reporting, such as

1 identification and reporting of transactions which appear to serve no  
2 legitimate business purpose and cash transaction structuring to avoid  
3 Cash Transaction Report limits.

4 (11) Any documents related to the training of tellers as to when to make  
5 unusual activity or suspicious activity reports, including policies and  
6 procedures. In addition, provide a schedule of all branch training courses  
7 completed by branch personnel at the branches identified in the Third  
8 Amended Complaint during the relevant period. This schedule should  
9 include courses, attendees and dates of attendance for each respective  
10 branch.

11 (12) Any currency transaction reports prepared regarding Mr. Menaged's  
12 personal accounts or his business accounts.

13 (13) Any policies and procedures regarding when currency transaction reports  
14 must be prepared and who they are routed to within the Bank. In  
15 particular, provide policies which address the reporting requirements of  
16 both cash and "near-cash" transactions (i.e., cashier's checks, money  
17 orders, or other negotiable instruments) which might be used by  
18 customers to avoid CTR reporting requirements.

19 (14) Any documents relevant or pertaining to the account opening process for  
20 all Menaged-related bank accounts, including all information obtained by  
21 the bank with respect to the bank's due diligence investigations, "know  
22 your customer" documents, Customer Due Diligence and/or Enhanced  
23 Due Diligence files or reports, or other documents containing information  
24 collected on Menaged and his businesses.

25 (15) Account and loan applications submitted by Menaged or his business  
26 entities and any underwriting activity documented as to the application.

27 (16) Any Bank policies and procedures regarding reporting of significant  
28 gambling activities within an account.

(17) Any policies and procedures pertaining or related to oversight of private  
bankers and branch personnel. In addition, provide, without limitation,  
any and all annual or periodic employment reviews for the period  
covering calendar years 2011 through 2017 of Susan Lazar (who was the  
private banker for Scott Menaged at JP Morgan Chase Bank), Samantha  
Nelson (f/k/a Samantha Kumbalek) and Vikram Dadlani (both of JP  
Morgan Chase Bank), and Hilda H. Chavez (U.S. Bank). Include  
compensation histories which identify base salary and bonus  
compensation separately, and any performance recognition awards and/or  
disciplinary actions related to each of the named employees.

1 (18) Any documents pertaining or related to increasing any financial limits  
2 regarding banking by Scott Menaged and his business entities; for  
3 example, increasing his limit for wire transfers, credit cards, business  
4 account withdrawals, or debit card transaction limits.

5 (19) For Chase Bank: All documents pertaining or related to Case # 5682556.  
6 On the Chase form provided the employee referral was from Sam Nelson;  
7 Alert Analyst was Alexander Gil, and Sharon Khoo worked as "BAU."  
8 Provide any documents explaining the role of the referral employee, the  
9 alert analyst and the "BAU."

10 (20) For Chase Bank: All documents pertaining or related to Case # 5763950.  
11 Employee referral was Sam Nelson; Alert Analyst was Alexander Gill.

12 This list describes the types of documents in the Bank's possession that may be marked  
13 as trial exhibits.

14 For each of the 40 certified checks issued by US Bank, Plaintiff will mark as trial  
15 exhibit for each property that was to be purchased: the counter-withdrawal slip, the deposit  
16 slip, the certified check, the loan file on the property (all previously produced), the email  
17 by cell phone/text sending a picture of the certified check (if available). **R-003262-3538**,  
18 provided herewith.

## 19 **IX. RELEVANT DOCUMENTS**

### 20 **From Initial Disclosure Statement:**

21 Documents maintained in the Document Depository established by the Receiver  
22 pursuant to an underlying Court Order dated January 1, 2017 in the matter titled *Ariz.*  
23 *Corp. Comm'n v. DenSco Investment Corp.*, Maricopa County Superior Court,  
24 CV2016-014142. Attached as Exhibit A is an index of the documents that are currently  
25 being maintained in the Document Depository.

### 26 **From First Supplemental Disclosure Statement:**

#### 27 **(a) Receiver website**

28 Peter Davis, as Receiver for DenSco, maintains a website containing information  
and case documents on the Receivership and related cases. The website address is:  
<http://denscoreceiver1.godaddysites.com/>.

1 The website contains documents as to the DenSco Receivership; Furniture King  
2 Receivership; Receiver v. Clark Hill; Receiver v. Chase and US Bank; Receiver v.  
3 Thomas P. Smith, et al.; Receiver v. Fischer Family Holdings, et al.; Receiver v.  
4 Griffin/Keg Inspections; Chittick Probate; Menaged Adversary; Menaged Bankruptcy;  
5 and US v. Menaged.

6 As to the Clark Hill case, the website has motions, statements of fact in support of  
7 motions, deposition transcripts and deposition exhibits, expert witness reports, disclosure  
8 statements and supplemental disclosure statements. It includes the expert report of  
9 Enrique Rodriguez, who Clark Hill designated as an expert witness against the Banks. All  
10 these materials can be obtained from the website.

11 **(b) Document Depository**

12 Documents are maintained in a Document Depository established by the Receiver  
13 pursuant to an underlying Court Order dated January 1, 2017 in the matter titled *Ariz.*  
14 *Corp. Comm'n v. DenSco Investment Corp.*, Maricopa County Superior Court, CV2016-  
15 014142. Plaintiff has previously disclosed as Exhibit A in its Original Rule 26.1 Statement  
16 an index of the documents that are currently being maintained in the Document  
17 Depository. All these documents are available to Defendants.

18 Plaintiff has provided Defendants a Depository Access Agreement. In relevant  
19 part, the Access Agreement states:

20 1. The Designated Party shall be given access to the documents in the  
21 Depository in accordance with the Depository Order.

22 2. The Designated Party acknowledges that he has read the Depository  
23 Order and understands and agrees to abide by the terms thereof, and further  
24 agrees that the Designated Party or any representative of same that is given  
25 access to the documents in the Depository shall first be required to read the  
26 Depository Order.

27 3. At such time as the Designated Party desires to inspect any document  
28 in the Depository, he shall contact the Receiver to arrange to be accompanied  
to the Depository. The Designated Party understands and agrees that he is  
only allowed access to the documents in the Depository when accompanied  
by an authorized representative of the Receiver.

1           4.     The Designated Party shall, within thirty days of acquiring possession  
2     or control of a Related Document or the date of this agreement, whichever is  
3     later, deliver to the Receiver for deposit in the Depository all Related  
4     Documents in their possession or control. The Designated Party is not  
5     required to deposit in the Depository any Documents the disclosure of which  
6     are protected by any privilege or which are otherwise confidential under  
7     applicable state or federal law, provided a written log of the documents  
8     withheld as privileged is provided to the Receiver.

9           5.     All modifications to this agreement shall be in writing.

10     As of the date of this disclosure, the Defendants have not signed the Depository Access  
11     Agreement. All documents in the depository can be reviewed by Defendants upon  
12     signing the Depository Access Agreement.

13     Defendant Banks Chase and US Bank produced documents to the Receiver in  
14     response to subpoenas that are stored in the document depository. Bank of America  
15     also has produced documents to the Receiver pursuant to one or more subpoenas.

16     Bank of America was used by DenSco. Menaged and Easy Investments also had  
17     accounts at Bank of America.

18     Bank of America closed DenSco's account in November 2014 out of concern  
19     for money laundering and/or that the transactions were out of proportion with what they  
20     anticipated the business would generate. DenSco then moved its banking to First Bank.

21     Defendant Banks Chase and US Bank produced documents to counsel for Clark  
22     Hill in response to subpoenas in the Clark Hill case and after a motion to compel.

23     Counsel for the parties have met and conferred on electronically stored  
24     information.

25     In a letter dated March 22, 2021, Counsel for US Bank requested Plaintiff to  
26     confirm or respond to the following:

27           (1) What specific devices containing ESI are in your client's possession or  
28     control (*i.e.*, laptops, IPADs, smart phones, external drives, etc.), including their  
   make, model, and operating system, as may be relevant (*i.e.*, Apple, Samsung,  
   etc.).

1 (2) What general categories of ESI data are contained on each (i.e., Outlook  
2 emails and calendars, text messages, WORD documents, Excel documents,  
3 JPEGs or IMG files, PDFs, etc.).

4 (3) With respect to the Receiver's upcoming supplemental disclosure, we agree  
5 that any emails including the extension "usbank.com" should be included with  
6 your client's production, along with any emails referencing "Chavez," "Wanta,"  
7 or any other U.S. Bank employee known to the Receiver, although we do not  
8 agree those are the only emails subject to Rule 26.1 production. We do request  
9 that along with whatever emails your client does produce, that they include the  
10 search criteria used to cull them.

11 (4) With respect to ESI or other documents in the Receiver's possession over  
12 which by agreement with Menaged are considered privileged in some way,  
13 please produce whatever agreements or letters are in your possession  
14 memorializing this agreement, and the log.

15 (5) Also, please confirm where this ESI or other documents are housed/stored,  
16 whether at your firm, the document depository, or elsewhere.

17 The Receiver did not receive any physical devices that contained original ESI. He  
18 received copied or extracted data from devices that Denny Chittick used. The Receiver  
19 received the following:

- 20 · A USB drive received from Gammage & Burnham, counsel to the Chittick  
21 Estate, containing Outlook data files maintained in a Yahoo email account,  
22 divided between emails that the Estate claimed were privileged and those  
23 designated as non-privileged emails with a privilege log;
- 24 · A USB drive received from D4, the contractor hired by the Chittick Estate,  
25 which contained the same data as described in the preceding bullet but which  
26 was not segregated for privilege;
- 27 · A USB drive received from the Chittick Estate's counsel containing electronic  
28 files extracted from Denny Chittick's computer that the Estate's counsel had  
determined related to DenSco; and
- A USB drive received from the Estate's counsel containing reports and files  
extracted from Denny Chittick's devices, including an iPad Air and an iPhone  
6s Plus.



1 During the Clark Hill litigation, our firm obtained a disk image of Chittick's  
2 devices. The disk image will be placed in the Document Depository.

3 The Receiver received the following ESI from Scott Menaged's counsel which  
4 contained the following:

- 5 · A hard drive and backup drive each containing data extracted by Forensic  
6 Consulting Solutions from American Furniture's computer and Scott Menaged's  
7 computer, iPhone, and AOL email account; and
- 8 · A USB drive containing "Hot Docs" identified by FCS from the devices  
9 described in the previous bullet and a USB drive containing data extracted from  
10 Scott Menaged's iPhone.

11 With respect to the question regarding writings relating to the privilege log for  
12 Menaged's ESI, they were produced by letter to Defendant Banks, and a copy of the  
13 privilege log is also attached hereto. The ESI is maintained in the Document Depository.

14 In a letter dated October 5, 2020, counsel for US Bank requested that Plaintiff  
15 produce the following documents in its Rule 26.1 Supplements:

- 16 (a) Produce Menaged's emails to your client in which he identified the properties  
17 he intended to purchase with funds wired to his U.S. Bank account and for which  
18 he requested financing.

19 Menaged and Chittick's email files are in the document depository. Veronica  
20 Castro also produced emails to the Receiver, which are in the document depository in both  
21 hard copy and electronic format. The files can be searched as easily by the Defendants or  
22 the Plaintiff.

- 23 (b) Produce the loan agreements for the funds wired to Menaged's U.S. Bank  
24 account to finance those purchases.

25 DenSco kept a loan file on each property. The physical files are labeled by  
26 property address and by DenSco's 4-digit loan number. Hard copies of these files are  
27 in the document depository (Boxes 1-50, 56-59, and 61-62). Handwritten notes as to  
28 repayments are also in the loan files. Mr. Chittick reused paper; that is, he would print  
on the blank side of a completely unrelated document he had previously printed.

1 The Arizona Corporation Commission scanned both sides of the documents in  
2 these files, so the loan files contain a lot of erroneous documents that do not relate to  
3 the corresponding loans. The scanned copies of the DenSco loan files are contained on  
4 a USB Drive located in Box 95.

5 (c) Produce the statements or ledgers showing repayments on those loans.

6 Handwritten notes/ledgers are in the loan files. DenSco would record payments  
7 in its QuickBooks database, but did not always allocate interest payments to a particular  
8 loan. The QuickBooks information is contained in an electronic file, which can be read  
9 with QuickBooks software, and is located in the depository.

10 (d) Identify the cashier's checks your client contends U.S. Bank wrongfully  
11 issued and then accepted for redeposit, by date and amount. Your disclosure  
12 states there are "at least" 60 of them, but does not otherwise identify them. The  
13 dates and amounts, along with the last four digits of the account from which they  
were drawn, should be sufficient.

14 The Receiver has a list of checks on an Excel Spreadsheet, and pdf files  
15 containing copies of cashier's checks from the bank subpoena records. There were 40  
16 cashier's checks issued and re-deposited to the US Bank account.

17 In addition, in Chittick's computer files there are 20 additional US Bank  
18 cashier's checks that do not appear to be forged but were not drawn from any of the  
19 Menaged US bank account records that the Receiver has records of. There are also 11  
20 Chase cashier's checks found in Chittick's computer files that were not traced to  
21 Menaged's Chase accounts.

22 US Bank can also derive this information from their own records. For example,  
23 Rick Rodriguez, the bank expert for Clark Hill, determined from the records:

- 24 • On January 13, 2014 at 3:03 p.m., US Bank issues Menaged a cashier's  
25 check in the amount of \$86,500, with the purpose/remitter identified as "DenSco  
26 5122 E Shea Boulevard # 2034 Scottsdale AZ." The check was made payable to  
27 trustee Recon Trust. DIC0013821. One minute later, at 3:04 p.m., Menaged

1 deposited \$86,500 back into the same account. DIC0013820, DIC0012885,  
2 DIC0012873.

3 • On January 16, 2014 at 12:25 p.m., US Bank issues Menaged a cashier's  
4 check in the amount of \$99,309.00, with purpose/remitter identified as "DenSco  
5 for Payment 2025 N 106th Dr Avondale." The check was made payable to "David  
6 W Cowles Trustee." (DenSco had wired Menaged \$109,300.00 on Jan 16, 2014,  
7 DIC12876) Yet at 12:25 p.m. that same day, Menaged deposited \$99,309.00 back  
8 into his account. DIC0013822-13823.

9 • The very next day, on January 17, 2017, US Bank issues Menaged a  
10 cashier's check for \$159,000 with remitter identified as DenSco and the purpose  
11 as 510 S. Jackson St. See DIC0013825. (DenSco had wired Menaged \$169,00.00  
12 on Jan 17, 2014, DIC12876.) The check appears to have been issued at 12:51 p.m.  
13 That same day, at 12:51 p.m., Menaged deposits \$159,000 back into his account.  
14 See DIC0013824. A few days later, on January 23, 2014, the same thing happens.

15 • On January 23, 2014, US Bank issues Menaged a cashier's check for  
16 \$164,509.00, with the purpose/remitter identified as "DenSco for 14338 W Amelia  
17 Ave, Goodyear AZ." (DenSco had wired Menaged \$174,500.00 on Jan 23, 2014,  
18 DIC0012876.) That same day, Menaged redeposits \$164,509.00 into his account.  
19 DIC0013826-13827.

20 • The very next day, on January 24, 2014, it happens again, this time in the  
21 amount of \$344,501.00. DIC0013828-29. (DenSco had wired Menaged  
22 \$354,501.00 on Jan 24- DIC0012877.)

23 In February and March, the pattern repeats. Each time, US Bank issues Menaged  
24 a six-figure sum via cashier's check, with the purpose/remitter listing DenSco's  
25 name and a property address. And each time, Menaged deposits the exact same  
26 amount back into his account, usually the same day. See, e.g., DIC0013854-13855  
27 (February 10, 2014); DIC0015749-15750 (Feb 24, 2014 - two cashier's checks  
28 redeposited within minutes); DIC0015766 (February 27, 2014); DIC15772-15773

(February 28, 2014), DIC15774-15778 (March 4, 2014), DIC157804-1508 (March 5, 2014 - two cashier's checks redeposited); DIC15847-15850 (March 14, 2014-three cashier's checks redeposited); DIC0015927-29 (April 7, 2014-two checks).

Mr. Rodriguez found the same patterns as to Chase Bank:

- On April 10, 2014, Chase provided Menaged with two cashier's checks in the amount of \$243,409 and \$174,300, each of which listed DenSco in the Memo line and identified a specific address. DIC0016636-37. Both were redeposited that same day. DIC00166332.

- On April 11, 2014, Chase provided Menaged with two cashier's checks in the amount of \$176,200.00 and \$143,200.00, each of which listed DenSco in the memo line and identified a specific property address. DIC0016638-39. Both were redeposited that same day. DIC 16640. Another April 11, 2014 cashier's check for \$154,900 (DIC0016648) was also redeposited that same day. DIC0016647.

- On April 14, 2014, Chase provided Menaged with more cashier's checks: \$368,500 and \$105,800. DIC0016645-46. They were redeposited that same day. DIC16649. The checks were stamped, "Not used for purposes intended."

- On April 15, 2014, Chase issued Menaged a \$279,600 check (DIC0016652), which Menaged redeposited that same day. DIC0016660.

- On April 16, 2014, Chase issued Menaged five more cashier's checks: \$96,900 (DIC0016663), \$175,600 (DIC0016665), \$117,213 (DIC0016666), \$264,310 (DIC0016667), \$153,100 (DIC0016668). All of them are stamped "not used for purposes intended," and all of them were redeposited that same day. DIC0016679, 16681, 16683, 16685.

- On April 17, 2014, Chase issued Menaged three more cashier's checks: \$96,810 (DIC0016689), \$177,200 (DIC0016690), \$174,609 (DIC0016694). All of them are stamped "not used for purposes intended" and redeposited. DIC0016693, 16696.

1 This pattern would repeat itself, often multiples times a week, for months on end.  
2 Meanwhile, Menaged was often withdrawing tens of thousands of dollars, at times  
3 clearly to pay casinos. See e.g., DIC0016653.

4 (e) Produce the emails or text messages with the photographs of the U.S. Bank  
5 cashier's checks Menaged or Castro emailed or texted to your client.

6 As noted above, emails from and between Menaged, Veronica Castro and  
7 Chittick can be searched in the electronic files. Any attachment to emails would be in  
8 these files. The Receiver has a copy of Menaged's native email files which contain  
9 selected emails between Menaged and the Banks. The Receiver, in searching these  
10 files, searched for "chase" and "usbank" which resulted in all emails referencing  
11 @chasebank.com and @usbank.com email addresses.

12 There were several emails referenced during the deposition of Samantha Nelson  
13 in which Menaged requested cashier's checks. These emails were produced by Chase  
14 Bank in the Clark Hill case in response to a subpoena from Clark Hill. See JPMC  
15 000569-001187. These emails were not in Menaged's native files because his email  
16 files contain only emails received, not sent.

17 Clark Hill received an image of Chittick's computer. In the Clark Hill case, they  
18 produced a photo file on computer which had some saved images of checks.  
19 Apparently, DenSco saved some of the images, but did not keep all check images.

20 Veronica Castro produced documents in a pdf format, and some images are in  
21 her emails. Her documents are in the depository in both hard copy and electronic  
22 format.

23 (f) Produce the receipts, trustee deeds upon sale, deeds of trust, or other  
24 documents DenSco was provided evidencing the sales for which the funds wired  
25 to the U.S. Bank account were loaned.

26 As noted above, loan files are in the depository. What Menaged and Veronica  
27 Castro sent to DenSco can be searched from their files. Menaged and/or Veronica  
28 Castro would falsify trustee receipts. Chittick, not knowing of the phony sales,

1 recorded Mortgages on properties which should be in the public recordings for  
2 Maricopa County.

3 (g) Produce all communications, whether emails or otherwise, between  
4 Menaged and DenSco regarding the above-referenced loans, wires, and  
5 purchases.

6 See answers above. In addition, DenSco bank statements are in the Depository.  
7 Bank of America and First Bank were DenSco's banks.

8 (h) Produce the 8/4/17 settlement agreement between the Menageds and  
9 DenSco.

10 Plaintiff will produce the Settlement Agreement if it is not on the Receiver's  
11 website.

12 **From Plaintiff's Second Supplemental Disclosure:**

13 (a) Declaration of Scott Menaged, bates **R-000049-51** (prior case bates  
14 Receiver\_004884).

15 (b) Bank of America documents, bates **R-000036-47** (prior case bates  
16 CH\_BOA\_SDT\_0001 to 00031); and native file on excel, **R-000040**.

17 (c) Chase unusual activities report, bates **R-000048** (prior case bates  
18 JPMC001188).

19 (d) US Bank emails from Menaged's computer, bates **R-000442-443, R-**  
20 **000653-654; R-001091-1323**.

21 (e) Chase Bank emails from Menaged's computer, bates **R-000052-441, R-**  
22 **000444-652, R-000655-1090**.

23 (f) Spreadsheet cashier's checks – second fraud, bates **R-001324**.

24 (g) Chase Bank cashier's checks images not traced to Menaged accounts, bates  
25 **R-001325-1335**.

26 (h) Chase Bank cashier's checks images, bates **R-001336-002679**.

27 (i) Chase Bank cashier's checks list, bates **R-002680-2703**.

28 (j) US Bank cashier's checks images not traced to Menaged accounts, bates **R-**  
**002704-2723**.

1 (k) US Bank cashier's checks images, bates **R-002724-2763**.

2 (l) US Bank cashier's checks list, bates **R-002764-2765**.

3 **From Plaintiff's Third Supplemental Disclosure:**

4 Plaintiff produced on disc copies of depositions taken in the Clark Hill case, and a  
5 list of trial exhibits in the Clark Hill case with the hard copy document.

6 **Plaintiff's Fourth Supplemental Disclosure:**

7 (a) For each of the 40 certified checks issued by US Bank, Plaintiff will mark  
8 as trial exhibit for each property that was to be purchased: the counter-withdrawal slip,  
9 the deposit slip, the certified check, the loan file on the property (previously produced),  
10 the email by cell phone/text sending a picture of the certified check (if available). **R-**  
11 **003262-3538**.


12 (b) Combined Summary Spreadsheet for each of the 40 certified checks issued  
13 by US Bank, referencing the bates numbers for the items above in (a), along with copies  
14 of each supporting document for each item, organized by property address.

15 (c) Correspondence between Ryan Anderson and Tiffany Bosco regarding fake  
16 trustee receipts. **R-003539-3553**.

17 DATED this 19th day of May, 2021.

18 OSBORN MALEDON, P.A.

19  
20 By


  
Colin F. Campbell  
Geoffrey M. T. Sturr  
Timothy J. Eckstein  
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23 Attorneys for Plaintiff  
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1 COPY of the foregoing served by first-class mail  
2 (with courtesy copy by email) this 19th day of May, 2021, on:

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1. DenSco Investment Corporation is the Plaintiff for the above entitled action.
2. I have read the foregoing Plaintiff's Supplemental Rule 26.1 Disclosure Statement and know the contents thereof.
3. The statements and matters alleged are true of my own personal knowledge as the receiver for DenSco Investment Corporation, except as to those matters stated upon information and belief, and as to such matters, I reasonably believe them to be true.

**DENSCO INVESTMENT CORPORATION, an Arizona corporation**



By: Peter S. Davis  
Its: Receiver

OSBORN  
MALEDON

A PROFESSIONAL ASSOCIATION  
ATTORNEYS AT LAW

Davis v. US Bank, et al.  
CV2019-011499

Disc Burn Date  
05/18/2021

Plaintiff's 4th Supplemental  
Disclosure Statement