

From: [Peter Elkind](#)
To: [Layman, James](#)
Cc: [Mishaan, Jessica](#)
Subject: Re: August 22, 2023 Public Records Request re MoneyGram documents
Date: Tuesday, September 5, 2023 3:56:35 PM

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Dear Mr. Layman,

Thank you for your prompt reply to my request. After reading your letter, I would ask you to reconsider your decision to withhold the April 6, 2018, MoneyGram report in its entirety.

While I certainly understand the desire to avoid disclosing “trade secret information concerning the practices and methods used by MoneyGram to prevent fraud,” and I have of course not seen the document myself, I’m skeptical that the *entire* report – or even most of it – reveals specific fraud-prevention methods that remain undisclosed even today, more than five years later. My experience with such reports is that they often summarize the incidence of fraud, detail general identification measures implemented to impede fraud (mostly evident to anyone sending or receiving a money transfer), and chart the impact of such measures – rather than spelling out specific, detailed internal methods whose disclosure could assist fraudsters. Such compliance reports also typically reflect statistical progress in stemming fraud over multiple years, as well as training efforts for agents and consumer education. Again, none of this should reveal any confidential secrets that would assist fraudsters in committing fraud.

I’d ask that you re-review this document while keeping in mind the narrow standard of what portion truly identifies “trade-secret” fraud-prevention methods. In doing so, I’d ask that you release all other portions of the report, perhaps with some limited redactions, rather than treating the entire document as confidential.

If you prefer to have these questions addressed on appeal, please either forward to Robert McDougall, or let me know so that I may formally do so.

Thank you.

Regards,
Peter Elkind

Peter Elkind

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Co-author, *[The Smartest Guys in the Room](#)*
Author, *[Client 9](#)* and *[The Death Shift](#)*

From: Layman, James <James.Layman@vermont.gov>
Date: Tuesday, September 5, 2023 at 2:24 PM
To: Peter Elkind <Peter.Elkind@propublica.org>
Cc: Mishaan, Jessica <Jessica.Mishaan@vermont.gov>
Subject: August 22, 2023 Public Records Request re MoneyGram documents

Peter,

Please find enclosed a response to your 8/22/2023 public records request.

Best,

James

James Layman
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