

From: [Layman, James](#)
To: peter.elkind@propublica.org
Cc: [Mishaan, Jessica](#)
Subject: August 22, 2023 Public Records Request re MoneyGram documents
Date: Tuesday, September 5, 2023 3:24:02 PM
Attachments: [2023-09-05 Elkind Moneygram PRA Response.pdf](#)

Peter,

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

Best,

James

James Layman
Assistant Attorney General
Vermont Office of the Attorney General
Public Protection Division
109 State Street
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802.828.2315
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September 5, 2023

Via Email

Peter Elkind
ProPublica
peter.elkind@propublica.org

RE: August 22, 2023 Public Records Request re MoneyGram documents

Dear Peter:

We are in receipt of your public records request dated August 22, 2023 seeking documents related to the 2016 MoneyGram multistate settlement. You requested:

“annual reports on ‘progress in implementing injunctive provisions’ of the settlement, which were required for reporting periods beginning April 2016, and running through April 2019;” and

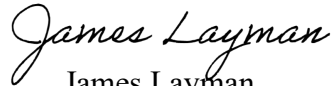
“any and all reports prepared by MoneyGram’s outside compliance monitor that were submitted to your office upon request made by the Multistate Executive Committee during the 2016-2019 reporting period.”

In response to your request, we have identified one document responsive to this request, an April 6, 2018 report from MoneyGram Payment Systems, Inc. titled “Confidential Assurance of Voluntary Compliance Annual Report.” The report was submitted to the Attorney General’s Office under a “confidential” seal. Pursuant to 1 V.S.A. § 317(c)(9), this document is exempt from disclosure as it contains confidential trade secret information concerning the practices and methods used by MoneyGram to prevent fraud. To the extent the information contained in this report is not already publicly available, the Vermont Attorney General’s Office is concerned that the public release of details concerning MoneyGram’s fraud prevention efforts could undermine those efforts. We appreciate ProPublica’s interest and concern in fraud that takes place through

MoneyGram's networks, but we are unable to release the responsive document we have identified at this time. You may wish to contact MoneyGram directly for your inquiry. If our office reaches a different determination at a later date, we will update and notify you.

An appeal of this decision can be made to Robert McDougall, Deputy Attorney General, at robert.mcdougall@vermont.gov.

Sincerely,

A handwritten signature in cursive script that reads "James Layman".

James Layman
Assistant Attorney General
Environmental and Public Protection Division