

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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FEDERAL TRADE COMMISSION,)	
)	
	Petitioner,)	
)	
	v.)	Case. No. 1:13-mc-00131-AKH
)	
THE WESTERN UNION COMPANY,)	(Nature of Case M 18-304:
)	Administrative Subpoena Proceedings)
and)	
)	
LONNIE KEENE, MONITOR,)	
)	
	Respondents.)	
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**APPLICATION OF THE FEDERAL TRADE COMMISSION
FOR AN ORDER TO SHOW CAUSE WHY THE WESTERN UNION COMPANY
SHOULD NOT BE HELD IN CIVIL CONTEMPT**

Preamble

Petitioner, the Federal Trade Commission (“FTC” or “Commission”), applies to this Court for entry of an order directing respondent The Western Union Company (“Western Union”) to show cause why it should not be held in civil contempt for its failure to comply with this Court’s order of June 7, 2013 (“June 7 order”).¹ Dkt. 47. The Commission seeks daily monetary sanctions against Western Union for its failure to comply. Alternatively, the Commission asks the Court to direct Western Union to implement the final search protocol

¹ The Commission construes Individual Rule 2.E to apply to discovery disputes under the Federal Rules of Civil Procedure. This case does not arise under the Federal Rules of Civil Procedure and instead concerns Western Union’s compliance with the Court’s order enforcing administrative compulsory process issued pursuant to Section 20 of the FTC Act, 15 U.S.C. § 57b-1. Should the Court determine that a joint letter is necessary, the Commission, of course,

developed by the parties and produce the results to the Commission no later than December 20, 2013.

In the June 7 order, this Court enforced nearly all aspects of a Civil Investigative Demand issued to Western Union in the course of the Commission's investigation of whether Western Union has adequate policies and procedures in place to identify and deter fraud-induced money transfers. The Court directed Western Union to, *inter alia*, produce reports prepared by a Monitor appointed by an Arizona state court to oversee Western Union's anti-money laundering operations. Of particular significance here, the Court also ordered Western Union to produce documents responsive to Specification 2 of the CID – *i.e.*, all documents “referring or relating to communications with the Monitor” – in accordance with a search protocol to be finalized by the FTC after consultation with Western Union. The June 7 order stated that “Western Union *shall accept* the FTC's” final choice of search protocol and shall “within 15 days ... produce all of the documents identified as a result of its execution of the protocol,” subject only to the FTC's discretion to grant extensions. Dkt. 47 ¶ 14 (emphasis added). On June 21, 2013, this Court denied Western Union's Motion for Clarification and/or Reconsideration. Pursuant to the Court's order, the FTC provided the final search protocol on August 8, 2013, and directed Western Union to commence production within 15 days and to provide a schedule that would complete production by October 31, 2013.

Nonetheless – five months after entry of the Court's order enforcing this aspect of the Commission's CID, and eleven months after being served with the Commission's CID – Western Union has not yet accepted the protocol or produced a single document in response. Western

will provide one.

Union has further rejected the FTC's efforts to reduce the burden on the company in producing responsive documents, including the FTC's offer to assume the cost and effort of review and production itself. Finally, even after the deadlines for doing so has passed, Western Union has continued to lodge objections, including some that contradict positions Western Union previously advanced to this Court.

The Commission therefore requests that this Court find Western Union in contempt of the June 7 order and impose coercive sanctions, including daily monetary sanctions, to bring the company into compliance. Alternatively, the Commission requests that the Court order Western Union to execute the final search protocol developed by the parties by a date certain. Through its continuing refusal to execute the search protocol, Western Union continues to delay the Commission's investigation, thereby impeding the Commission's investigatory functions pursuant to Sections 6 and 20 of the FTC Act, 15 U.S.C. §§ 46, 57b-1, and thwarting the Commission's ability to perform its law enforcement duties pursuant to Section 5 of the FTC Act, 15 U.S.C. § 45.

The Declaration under penalty of perjury of Karen D. Dodge, which verifies the allegations of this application, is attached hereto as Contempt Exhibit (Contempt Exh.) 1. Additional exhibits are as follows:

- Contempt Exh. 2 Letter from Chong S. Park to Burke Kappler, June 20, 2013;
- Contempt Exh. 3 Letter from Burke Kappler to Edward B. Schwartz, July 17, 2013;
- Contempt Exh. 4 Letter from Edward B. Schwartz to Burke W. Kappler, July 22, 2013;
- Contempt Exh. 5 Letter from Edward B. Schwartz to Burke W. Kappler, August 7, 2013;

- Contempt Exh. 6 Letter from Burke W. Kappler to Edward B. Schwartz, August 8, 2013;
- Contempt Exh. 7 Letter from Edward B. Schwartz to Burke W. Kappler, August 27, 2013;
- Contempt Exh. 8 E-mail from Jose Gonzales-Magaz to Burke Kappler and Leslie Melman, September 12, 2013;
- Contempt Exh. 9 Letter from Burke Kappler to Edward B. Schwartz and Jose Gonzales-Magaz, October 18, 2013;
- Contempt Exh. 10 Letter from Edward B. Schwartz to Burke Kappler and Leslie Melman, October 29, 2013; and
- Contempt Exh. 11 Declaration of Hugh Huettner, November 7, 2013.
- Contempt Exh. 12 [Proposed] Order to Show Cause

Application Allegations

In support of this application, the Commission alleges as follows:

1. The Commission is an administrative agency of the United States, organized and existing pursuant to the FTC Act, 15 U.S.C. § 41 *et seq.* The Commission is authorized and directed by Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), to prevent the use of unfair methods of competition and unfair or deceptive acts or practices in or affecting commerce. The Commission is also authorized by the Telemarketing Sales Rule to prevent deceptive or abusive telemarketing acts or practices. 16 C.F.R. pt. 310. Section 20 of the FTC Act, 15 U.S.C. § 57b-1, authorizes the Commission to issue a CID whenever it has reason to believe that any person may have information relevant to unfair or deceptive acts or practices in or affecting commerce.

2. Western Union is a public company, incorporated in Delaware, with its principal place of business in Englewood, Colorado. Western Union offers a number of financial services, including money transfers. The company operates through a global network of 510,000 agents in

200 countries, including numerous agents in New York City. Western Union is engaged in, and its business affects, “commerce,” as that term is defined in Section 4 of the FTC Act, 15 U.S.C. § 44. Dkt. 1 ¶ 3.

3. This Court has the inherent authority to issue an order of civil contempt when (1) the order being violated is clear and unambiguous; (2) the proof of noncompliance is clear and convincing; and (3) the respondent has not been reasonably diligent and energetic in attempting to comply. *EEOC v. Local 638, Local 28 of Sheet Metal Workers’ Int’l Ass’n*, 753 F.2d 1172, 1178 (2d Cir. 1985); *NBA v. Design Mgmt. Consultants, Inc.*, 289 F. Supp. 2d 373, 376 (S.D.N.Y. 2003).

4. On April 15, 2013, the Commission filed a Petition for an Order Enforcing Civil Investigative Demands Issued in Furtherance of a Law Enforcement Investigation to enforce compliance with a CID issued to Western Union on December 12, 2012. Dkts. 1 to 1-4. The Commission issued the CID pursuant to Section 20 of the FTC Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of Section 5 of the Federal Trade Commission Act or the Telemarketing Sales Rule.

5. On April 22, 2013, this Court issued an Order to Show Cause that established a briefing schedule and required Western Union to appear on May 28, 2013. Dkt. 8.

6. On May 28, 2013, this Court conducted a show cause hearing on the Commission’s Petition. Dkt. 41. Following the hearing, on June 7, 2013, the Court entered an order enforcing the CID. Dkt. 47.

7. In its order, the Court found that the Monitor’s Reports and other documents requested pursuant to Specification 2 of the CID issued to Western Union are reasonably relevant

to the FTC's investigation. Dkt. 47 ¶ 6. These documents include "[a]ll documents referring or relating to communications with the Monitor." Dkt. 1 at 34-35. These documents describe Western Union's own communications about the Monitor and his findings and play a central role in evaluating whether Western Union has effective policies and procedures to respond to illegal transactions occurring in its system.

8. The Court's June 7 order also set forth a four-step process by which the parties would develop a protocol for Western Union to use to locate and produce documents that refer or relate to communications with the Monitor. Dkt. 47 ¶¶ 13-15. Under this process:

- a. "Western Union shall, within 14 days of the entry of this Order, produce a proposed protocol" for the relevant document search;
- b. "The FTC shall respond in a timely fashion to Western Union's proposed protocol and may provide additional or alternative search terms or additional or alternative steps for searching for, identifying, and producing documents";
- c. "Within 5 days, Western Union shall advise the FTC whether any of the additional or alternative search terms or steps are either overinclusive or underinclusive, with a statement of the specific reasons for its position and supporting data"; and
- d. "[T]he FTC shall promptly respond to Western Union's information," and "Western Union *shall accept* the FTC's response and, within 15 days of the FTC's response, or at such later time as may be agreed by the FTC,

produce all of the documents identified as a result of its execution of the protocol and the FTC's response."

Dkt. 47 ¶¶ 13-14 (emphasis added). The FTC's response in the fourth step was binding on Western Union and triggered a duty to execute the protocol and produce all of the documents promptly.

9. From June 20, 2013 to August 8, 2013, Western Union and the FTC engaged in a series of exchanges of search terms and custodians to be searched pursuant to paragraphs 13 and 14 of the order:

- a. On June 20, Western Union made an initial proposal for a search protocol. Though Western Union had told this Court that "no fewer than 57" custodians would need to be searched, *see* Dkt. 41 at 24, Western Union's initial proposal called for a search of only 10 Western Union custodians, using sets of "base" and "limiting" terms. Under this approach, Western Union would only be required to review and produce those documents "hit" by a combination of both a base and a limiting term; a "hit" by only a base term or only a limiting term would not be sufficient to require review. Western Union proposed 7 base terms and 10 limiting terms. Contempt Exh. 2.
- b. On July 17, the FTC responded with additional terms and custodians. These came from FTC staff's detailed review of the Monitor's reports and consultation with the Monitor to identify those Western Union employees with whom he had communications. The FTC's response included 135

custodians, 34 base search terms, and 23 limiting search terms to be used in conjunction with the base terms. Contempt Exh. 3. Under the terms of the June 7 order, Western Union had 5 days to respond and inform the FTC, using supporting data and specific reasons, why these terms and custodians were over- or underinclusive. Dkt. 47 ¶ 14.

- c. Western Union did not respond within 5 days. Instead, on July 30, counsel for Western Union met with counsel for the FTC. At that meeting, counsel asked for the FTC to consider reducing the numbers of custodians and search terms, on the grounds that the FTC's response was burdensome. Western Union did not provide supporting data or specific reasons, as required by the Court's order. *See id.*; Contempt Exh. 6 at 3-4.
- d. On August 8, although not required by the order to continue the iterative exchange of search terms and custodian lists beyond its response to Western Union's initial proposal, the FTC nonetheless consented to reduce the number of custodians to 74. This reduction was based on additional review of the Monitor's reports, further discussions with the Monitor, and the Commission's interest in being able to continue the investigation. The FTC also accepted Western Union's proposal for revising the base and limiting search terms, although it was not required by the order to do so. The FTC informed Western Union that this final response established the search protocol and triggered Western Union's production obligations under the order. Specifically, the FTC directed Western Union to execute

the protocol, make an initial production within 15 days, and complete the entire production by October 31, 2013. Contempt Exh. 1 ¶¶ 13-14; Contempt Exh. 6.

10. Western Union did not execute the protocol, commence production, or complete production by October 31, 2013. Instead, on August 27, 2013, the company responded and provided an estimated cost of search and production. Based on an analysis of documents for only three custodians, the company also provided data regarding hit rates for the search terms selected by the FTC. After providing this information, the company informed the Commission that it would not run the protocol or produce documents without an agreement by the Commission to additional reductions in search terms and custodians. Contempt Exh. 1 ¶ 15; Contempt Exh. 7.

11. On September 10, 2013, counsel for the FTC and Western Union had a follow-up meet-and-confer. At this meeting, Western Union provided the FTC with three entirely new pieces of information:

- a. Although it did not disclose when the project began, the company was undertaking a migration of its e-mail system from Lotus Notes to Microsoft Outlook. This migration was already in process and imposed additional costs and delays in production of responsive information. Western Union had not disclosed this project to the FTC prior to this point, although counsel stated that it had considered doing so.

- b. The company wanted additional changes to the search protocol, reducing the number of identified custodians and search terms beyond those discussed in the FTC’s final search protocol; and
- c. Western Union intended to search and produce documents according to an unduly narrow and incorrect interpretation of Specification 2 that was inconsistent with the definitions in the CID – namely, “discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part” – as well as with representations made to the Court at the hearing on the order to show cause. Contempt Exh. 1 ¶ 16; Contempt Exh. 9; Pet. Exh. 4 (Dkt. 1 at 28-29); Dkt. 41 at 21.

12. In response, on October 18, 2013, the FTC gave Western Union two options for proceeding: either (1) Western Union could execute the final search protocol described in the August 8 letter, or (2) Western Union could turn over the documents for all of the identified 74 custodians to the FTC so that the FTC could run the search protocol and convene an independent “taint team” to perform a privilege review. This second option was designed to address Western Union’s complaints about costs and to facilitate the production of documents in an expeditious manner. Contempt Exh. 11 ¶ 20. The FTC also offered to seek entry of a clawback order that would preserve Western Union’s privilege pursuant to Fed. R. Evid. 502(d). Contempt Exh. 1 ¶ 17; Contempt Exh. 9. The FTC employs similar procedures in many of its investigations. Contempt Exh. 11 ¶¶ 16-17. The Commission routinely receives, processes, and reviews larger

amounts of information than Western Union claimed the FTC's search protocol would produce. *Id.* ¶¶ 18-19.

13. On October 29, 2013, Western Union responded by rejecting both of these options. The company offered to engage in further negotiations, and, again, sought to have the FTC agree to reductions in the number of custodians and search terms described in the final FTC search protocol. Contempt Exh. 1 ¶ 18; Contempt Exh. 10.

14. To date, Western Union has not produced any "documents referring or relating to communications with the Monitor" that are responsive to Specification 2 and that are subject to the search protocol required by paragraphs 13 and 14 of the Court's June 7 order. Contempt Exh. 1 ¶¶ 19-20. Because these documents show Western Union's responses and communications regarding the findings of the Monitor about the company's tools for detecting illegal transactions in its system, they are critical to assessing whether Western Union has adequate policies and procedures for detecting and deterring fraud-induced money transfers.

Prayer for Relief

WHEREFORE, the Commission invokes the aid of this Court and prays that the Court issue an order for Western Union to show cause² why it should not be held in civil contempt and subject to the following sanctions:

a. That the Court order Western Union to comply with the June 7 order by executing the final search protocol issued by the FTC on August 8, 2013 and begin producing the results to the FTC no later than November 18, 2013 (“Contempt Order”);

b. That the Contempt Order further direct Western Union to complete production of all responsive information and provide the certification of compliance required by paragraph 16 of the June 7 order no later than December 20, 2013; and

c. That this Court impose upon Western Union coercive sanctions of \$140,534 per day for (1) each day between November 18, 2013 and the first production of information to the FTC resulting from execution of the final search protocol, and (2) for each day between December 20, 2013 and production of the certification of compliance pursuant to paragraph 16 of the June 7 order.

d. For such other relief as the Court deems just and proper; or

e. *Alternatively*, should the Court determine that coercive daily monetary sanctions are not warranted, the Court should nonetheless find Western Union in contempt and order that the company comply with the final search protocol and produce the responsive documents by December 20, 2013.

² The Commission’s proposed order to show cause is Exhibit 12 to this application. Pursuant to Rule 18.3 of the Court’s Electronic Case Filing Rules & Instructions, the Commission will also e-mail an identical version of the proposed order to show cause in Microsoft Word format to the

Respectfully submitted,

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Dated: November 8, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2013, I served a copy of the Federal Trade Commission's Application of the Federal Trade Commission for an Order to Show Cause Why The Western Union Company Should Not Be Held in Civil Contempt, with accompanying exhibits and supporting Memorandum of Law upon counsel for respondents The Western Union Company by filing these documents through the Electronic Case Filing (ECF) system for the United States District Court for the Southern District of New York.

I further certify that on November 8, 2013, I served the same documents upon counsel for Lonnie Keene, Keene Consulting Arizona, LLC, by e-mail to Michael Ledley, Esq. (mledley@wmd.law.com) and Fred Kessler, Esq. (fkessler@wmd-law.com).

Dated: November 8, 2013

s/ Burke W. Kappler
BURKE W. KAPPLER
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EXHIBITS

Tab No.	Document Description	Date
1	Contempt Exhibit 1 Declaration of Karen D. Dodge	November 7, 2013
2	Contempt Exhibit 2 Letter from Chong S. Park (Western Union) to Burke Kappler (FTC)	June 20, 2013
3	Contempt Exhibit 3 Letter from Burke Kappler (FTC) to Edward B. Schwartz (Western Union), with attachment	July 17, 2013
4	Contempt Exhibit 4 Letter from Edward B. Schwartz (Western Union) to Burke W. Kappler (FTC)	July 22, 2013
5	Contempt Exhibit 5 Letter from Edward B. Schwartz (Western Union) to Burke W. Kappler (FTC)	August 7, 2013
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7	Contempt Exhibit 7 Letter from Edward B. Schwartz (Western Union) to Burke W. Kappler (FTC), with attachment	August 27, 2013
8	Contempt Exhibit 8 E-mail from Jose Gonzales-Magaz (Western Union) to Burke Kappler and Leslie Rice Melman (FTC)	September 12, 2013
9	Contempt Exhibit 9 Letter from Burke Kappler (FTC) to Edward B. Schwartz and Jose Gonzales-Magaz (Western Union)	October 18, 2013
10	Contempt Exhibit 10 Letter from Edward B. Schwartz (Western Union) to Burke Kappler and Leslie Rice Melman (FTC)	October 29, 2013
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12	Contempt Exhibit 12 [Proposed] Order to Show Cause	

CONTEMPT EXHIBIT 1

Declaration of Karen D. Dodge

November 7, 2013

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL TRADE COMMISSION,)
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Petitioner,)
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v.)
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THE WESTERN UNION COMPANY,)
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and)
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LONNIE KEENE, MONITOR, STATE OF)
ARIZONA v. WESTERN UNION)
FINANCIAL SERVICES, INC., KEENE)
CONSULTING ARIZONA, LLC,)
)
Respondents.)
)
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DECLARATION OF KAREN D. DODGE

Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. I am an attorney employed by the U.S. Federal Trade Commission (“FTC” or “Commission”) in the FTC’s Midwest Region Office, located in Chicago, Illinois. I am assigned to the FTC’s investigation of telemarketing fraud and fraud-induced money transfers, including the role of money transfer companies such as The Western Union Company (“Western Union”) (FTC File No. 122 3208). The facts set forth herein are based on my personal knowledge or information made known to me in the course of my official duties.

2. The FTC filed this proceeding to enforce two Civil Investigative Demands (“CIDs”) that were issued by the Commission to Western Union and the Monitor appointed pursuant to a settlement agreement between the Attorney General for Arizona and Western Union.

See State of Arizona v. Western Union Fin. Servs., Inc., No. CV-2010-005807 (Ariz. Super. Ct. Maricopa Cnty. Feb. 24, 2010). The CIDs required the recipients to produce to the FTC reports prepared by the Monitor regarding Western Union's anti-money laundering program, as well as other documents related to those reports.

3. Pursuant to the order this Court filed on June 7, 2013 ("June 7 Order"), the Court found that the Monitor's reports and other documents requested pursuant to Specification 2 of the CID issued to Western Union are reasonably relevant to the FTC's investigation. Dkt. 47 ¶ 6. Therefore, the Court directed Western Union and the Monitor to produce the reports within 14 days of entry of the Order. *Id.* ¶¶ 10, 12.
4. The Court's June 7 Order enforcing the CID also set forth a procedure for determining the parameters of Western Union's search for the documents "referring or relating to" communications with the Monitor. *Id.* ¶¶ 13-15. This procedure required Western Union to produce a proposed protocol to the FTC, to which the FTC would be permitted to respond by providing Western Union with "additional or alternative steps for searching for, identifying, and producing documents." Although the Order provided that Western Union should advise the FTC if the additional or alternative terms were overinclusive or underinclusive, the Court's Order provided that "Western Union shall accept the FTC's response and . . . produce all of the documents identified as a result of its execution of the protocol and the FTC's response." *Id.* ¶ 14.
5. By letter dated June 20, 2013, Western Union provided the FTC its proposal regarding searches for the "referring or relating to" materials responsive to CID Specification No. 2. Contempt Exh. 2. On that same day, Western Union also produced some of the

Monitor's reports and reviews. Western Union's production amounted to only 335 pages. The Monitor separately produced reports and reviews to the FTC.

6. The court-appointed Monitor's reviews and reports are comprised of the Monitor's Implementation Plan dated January 27, 2011, and five Periodic Reviews dated January 31, 2011, June 7, 2011, December 14, 2011, June 14, 2012, and December 14, 2012. (Western Union's production did not include the January 27, 2011 Implementation Plan or the January 31, 2011 Periodic Review.) Some of the Periodic Reviews include an Appendix B, which provides schedules of meetings between the Monitor and Western Union personnel and lists the names of Western Union personnel who attended meetings with the Monitor and his team. Lonnie Keene, who was the Monitor from November 18, 2010 until March 15, 2013, was responsible for preparing the Implementation Plan and Periodic Reviews.
7. By its letter of June 20, 2013, Western Union proposed limiting its electronic searches to (1) communications with nine members of the Monitor's team and (2) the records of only ten employees at Western Union. For the records of the ten employees, Western Union further proposed using seven search terms relating to the Monitor, such as "the Monitor" and "Monitorship," and then conjoining those search terms with ten limiting terms such as "w/5 tell," "w/5 say*," and "w/5 said." Contempt Exh. 2.
8. For purposes of responding to Western Union's proposed search protocol, I reviewed the Periodic Reviews produced by the parties. On July 3, 2013, I conferred by telephone with Lonnie Keene, the Monitor who had prepared the Implementation Plan and Periodic Reviews, and his counsel, Mike Ledley of Wollmuth Maher & Deutsch LLP ("Wollmuth Maher"). The purpose for that call was to enlist the Monitor's aid in identifying

custodians at Western Union who were likely to have documents “referring or relating to” communications with the Monitor, and to discuss the types of searches and limiting terms that were likely to produce responsive documents. During that call, Mr. Keene identified Western Union employees who would likely have records “referring or relating to” communications with the Monitor, as well as important search terms to use in trying to locate responsive documents.

9. In particular, Mr. Keene indicated to me that all of the individuals whose names appeared in the meeting schedules attached as Appendix B to the Monitor’s Periodic Reviews were likely to have responsive documents. Mr. Keene specifically highlighted a number of custodians who were not on Western Union’s list as having played a critical role with respect to the Monitorship.
10. Based on FTC staff’s review of the Monitor’s Periodic Reviews and my conversation with Mr. Keene, the FTC modified the search protocol and expanded: the names on the Monitor’s team (by 15); the Western Union employees whose records were to be searched (by 125); the search terms (by 27); and the limiting terms (by 13). The FTC also proposed that Western Union include any other terms that it knew would be reasonably likely to identify responsive documents. Contempt Exh. 3.
11. By letter dated July 22, 2013, Western Union objected to most of the custodians added by the FTC based on staff’s discussions with the Monitor and review of the Monitor’s reports. Western Union proposed that it search the records of only 22 additional Western Union custodians, as opposed to the 125 proposed by the FTC. Western Union’s list still did not include a number of Western Union employees whom Mr. Keene had described as “critical” to his review of Western Union’s anti-money laundering program. Western

Union also objected to certain search terms and further objected to the FTC's proposal that Western Union search "[a]ny other term that Western Union knows would be reasonably likely to identify responsive documents." It claimed that the "Court's June 7, 2013 order does not impose such an obligation; nor is Western Union aware of any authority imposing such an obligation." Contempt Exh. 4.

12. Western Union also did not advise the FTC in what respect its additional search terms were "either overinclusive or underinclusive, with a statement of the specific reasons for its position and supporting data," as required by the Court's June 7 Order. Dkt. 47 ¶ 14.
13. After receiving Western Union's objections, and in a good faith attempt to further narrow the search protocol, FTC staff again reviewed the Monitor's Periodic Reviews, and on August 1, 2013, FTC staff convened another conference call with the Monitor, Lonnie Keene, and his counsel, Frederick Kessler, to discuss custodians and search terms. I participated in that call, as did Todd Kossow, the Midwest Region's Assistant Director, and Burke Kappler, an attorney in the FTC's Office of General Counsel. During that call, FTC staff again asked Mr. Keene questions about particular custodians whose names appeared in Appendix B of one or more of the Periodic Reviews and whose names the FTC had added to the search protocol. We also reviewed with Mr. Keene the significance of some of the additional search terms proposed by the FTC by its letter of July 17, 2013. Mr. Keene stated – again – that the meeting schedules in Appendix B to his Periodic Reviews contained the names of Western Union personnel that would likely have records related to communications with the Monitor and reiterated the importance of many of the search terms that the FTC had previously added to the search protocol. Nonetheless, in consideration of both Western Union's claimed burden and the FTC's

own need to get documents to move the investigation forward, the FTC agreed to significantly narrow the list of Western Union custodians to 74 and to modify the search terms consistent with Western Union's request.

14. By letter dated August 8, 2013, the FTC provided Western Union with its final search protocol, which reduced the number of Western Union custodians by almost half, from 135 to 74 individuals. The FTC's final search protocol also revised the search and limiting terms. Contempt Exh. 6.
15. Western Union did not execute the FTC's final search protocol, commence production, or provide a schedule for completion by October 31, 2013. Instead, on August 27, 2013, the company responded and provided an estimated cost of search and production of \$3.7 million based on an analysis of 3 out of 74 custodians. The company also provided data regarding hit rates for the search terms selected by the FTC based on the same three custodians. After providing this information, the company informed the FTC that it would not run the production or produce documents unless the FTC was willing to agree to additional reductions in search terms or custodians. The company further informed the FTC that it would not complete production by October 31, 2013. Contempt Exh. 7.
16. It is my understanding that on September 10, 2013, counsel for the FTC and Western Union had a follow-up meet-and-confer. Also present was a representative from Western Union's document vendor, UnitedLex, and representatives from the FTC's Litigation Support office. At this meeting, Western Union provided the FTC three entirely new pieces of information:
 - a. The company was undertaking a migration of its e-mail system from Lotus Notes to Microsoft Outlook. This migration was currently in process and required

Western Union to undertake duplicate searches in both the former, “legacy” system and in the new system;

- b. The company wanted additional changes to the search protocol, reducing the number of identified custodians and search terms beyond those discussed in the FTC’s final search protocol; and
 - c. Western Union intended to search and produce documents accordingly to an interpretation of Specification 2 that was inconsistent with the definitions in the CID. Contempt Exhs. 9, 11 ¶¶ 10-14.
17. Following this meeting, on October 18, 2013, the FTC responded and gave Western Union two options for proceeding. Western Union could either execute the final search protocol, as described in its August 8 letter. Alternatively, as the letter explained, Western Union could substantially reduce the costs of production by turning over the documents collected from all the identified custodians so that the FTC could run the search protocol itself and convene a separate and isolated “taint team” to conduct a privilege review. To further protect any Western Union privileged documents, the FTC also offered to seek entry of a clawback order pursuant to Fed. R. Evid. 502(d). The FTC specified a deadline of November 18, 2013 and asked Western Union to respond by October 25, 2013. Contempt Exh. 9.
18. By letter dated October 29, 2013, Western Union responded and rejected both of these options. The company offered to engage in further negotiations for purposes of seeking an agreement by the FTC to reduce the numbers of custodians and search terms in the final search protocol. The company also stated that it would not meet the new deadline of November 18, 2013. Contempt Exh. 10.

19. To date, Western Union has produced the following documents:
 - a. By letter dated June 20, 2013 – Monitor’s Periodic Reviews, responsive to Specification 2. (335 pages.)
 - b. By letter dated July 30, 2013 – Consumer complaints and related information, responsive to Specification 1. (2 electronic spreadsheets.)
 - c. By letter dated August 6, 2013 – Direct communications between the Monitor and his team and Western Union, responsive to Specification 2. (19,798 pages.)
 - d. By letter dated September 9, 2013 – Consumer complaints and related information, responsive to Specification 1. (59 images and 3 electronic spreadsheets.)
 - e. By letter dated September 20, 2013 – Consumer complaints and related information, responsive to Specification 1. (5,631 images.)
 - f. By letter dated September 30, 2013 – Consumer complaints and related information, responsive to Specification 1. (3 electronic spreadsheets.)
 - g. By letter dated October 18, 2013 – Consumer complaints and related information, responsive to Specification 1. (1091 images and 5 electronic spreadsheets.)

20. Other than producing some of the Monitor’s Periodic Reviews and direct communications with the Monitor and his team, Western Union has not made any production of “documents referring or relating to communications with the Monitor” that are subject to the search protocol and that are responsive to Specification 2. These documents will likely contain Western Union’s own internal communications about, and reactions to, the Monitor’s findings and recommendations about Western Union’s policies and procedures for detecting and preventing money laundering involving the company’s money transfers and other money transmission services or products. These documents would be important to assessing the adequacy of Western Union’s efforts to prevent illegal activities from using its system.

21. On August 7, 2013, Western Union advised the FTC that it was about to begin collecting electronic documents from a subset of the identified custodians. Contempt Exh. 5. As of September 12, 2013, Western Union advised the FTC it had collected e-mails from only 19 individuals. Contempt Exh. 8. As of October 29, 2013, this number increased to 32 custodians. Contempt Exh. 10.
22. I have reviewed Western Union's Annual Report for the year ending December 31, 2012, submitted as a 10-K form to the Securities and Exchange Commission ("Annual Report," available at <http://www.sec.gov/Archives/edgar/data/1365135/000136513513000008/wu-12312012x10k.htm>). The Annual Report indicates that in 2012, Western Union had revenues of \$5,664,800,000 and net income of \$1,025,900,000. Annual Report at 84-85. This annual net income figure equals daily net income of \$2,810,685 (or \$1,025,900,000 divided by 365 days). Five percent of this daily net income equals \$140,534.25.

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

Executed on November 7, 2013.



Karen D. Dodge, Staff Attorney
Midwest Region Office
Federal Trade Commission

CONTEMPT EXHIBIT 2

Letter from Chong S. Park (Western Union)
to Burke Kappler (FTC)

June 20, 2013

Chong S. Park
202 429 6275
Cpark@steptoe.com



1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

June 20, 2013

Via E-MAIL and HAND DELIVERY

Burke Kappler, Esq.
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: *Federal Trade Commission v. The Western Union Company*
MISC No. 13-mc-131-P1 (AKH)

Dear Burke:

Pursuant to Judge Alvin Hellerstein's Order of June 6, 2013 (Dkt. No. 47), enclosed please find copies of reports prepared by Lonnie Keene, Monitor, responsive to Specification No. 2 of the Civil Investigative Demand issued by the Federal Trade Commission ("FTC") to the Western Union Company ("Western Union" or "the Company"). As you know, these documents (bates labeled WU0000001-WU0000335) are highly confidential and are so marked. Western Union requests confidential treatment of these documents under all applicable laws, rules, and regulations governing the FTC.

In addition, Western Union proposes the search protocol outlined below to identify additional documents potentially relevant and responsive to the Commission's request under CID Specification No. 2 for all documents "referring or relating to communications with the Monitor."

I. Records reflecting direct communications between the Monitor and Western Union

- A. Western Union will search its email journaling system for email to and from the Monitor and members of the Monitor's team from January 1, 2011 to the present. The email journaling system captures email sent from or to all of Western Union's domestic email servers. Western Union uses the email journaling system to manage legal holds and discovery. Western Union will search the journaling system for email to and from the Monitor and members of the Monitor's team by searching the "To" "From" "Cc:" and "Bcc:" fields for the email addresses of the following:

Burke Kappler
June 20, 2013
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1. Lonnie Keene
2. Ted Greenberg
3. Dennis Lormel
4. Wyn Clark
5. Paul Lewis
6. Lisa Dawson
7. John Knapp
8. John Bell
9. Douglas Meadows
10. WUmonitor@gmail.com

Western Union will review the results of this search and will remove email (1) that is not responsive to CID Specification No. 2; (2) that is duplicative; or (3) that is responsive to CID Specification No. 2 but that is subject to a privilege. Western Union will identify on a privilege log email that is subject to a privilege.

II. Records of Western Union employees that interacted with the Monitor on a regular basis

A. Western Union will search its email journaling system for email to, from cc'ing or bcc'ing the following Western Union employees ("Custodians") for email containing the search terms in section II.B and II.C. below for the period January 1, 2011 to the present:

1. Richard Krollman
2. Blaine Newby
3. Joe Cachey
4. Jeannie Larsen
5. Alma Angotti
6. Hollis Baugh

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7. Luis Alvarez
8. Troy Deering
9. Barry Koch
10. Cherie Axelrod

The ten Western Union employees and representatives listed above interacted with the Monitor on a regular basis and/or served in a decision-making capacity and thus potentially maintained electronic documents that fall within the scope of the “referring to or related to” documents requested by the Commission.

B. Western Union will search the subject line and body of the email of the Custodians listed in section II.A. above for the following terms, subject to the limiting terms in section II.C., below:

1. “the Monitor”
2. “SWB Monitor”
3. “Monitorship”
4. “Lonnie”
5. “Keene”
6. “Ted”
7. “Greenberg”

C. Limiting terms:

1. w/5 tell
2. w/5 say*
3. w/5 said
4. w/5 told
5. w/ respon*
6. w/5 request*

Burke Kappler
June 20, 2013
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Steptoe
STEPTOE & JOHNSON LLP

7. w/5 demand*
8. w/5 ask*
9. w/5 wrote
10. w/5 writ*

In other words, Western Union will search for email to, from, cc'ing or bcc'ing Richard Krollman, Blaine Newby, etc. containing the terms "the Monitor," "SWB Monitor", etc. within five words of "tell," "say," "saying," etc.

III. Conduct of searches

- A. Western Union will review the results of the searches in sections I and II and will remove email (1) that is not responsive to CID Specification No. 2; (2) that is duplicative; or (3) that is responsive to CID Specification No. 2 but that is subject to a privilege. Western Union will identify on a privilege log email that is subject to a privilege. Western Union will produce the remainder.
- B. If the search described in section II yields a large number of nonresponsive documents, Western Union agrees to consult with the Commission prior to revising the searches with terms to exclude nonresponsive documents.

IV. Conduct of searches for hard copy documents

- A. Western Union will search the hard copy documents of the Custodians listed in section II.A. above for those that are responsive to CID Specification 2. Western Union will produce the responsive, non-privileged hard copy documents and will identify privileged documents on a privilege log.

Please let us know if you agree to Western Union's Proposed Search Protocol. The searches and review will proceed once we have your agreement to the proposed protocol.

Sincerely,



Chong S. Park

Enclosures

CONTEMPT EXHIBIT 3

Letter from Burke Kappler (FTC)
to Edward B. Schwartz (Western Union), with attachment

July 17, 2013



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Burke W. Kappler
Attorney
Office of General Counsel

Direct Dial: 202-326-2043
Fax: 202-326-2477
E-mail: bkappler@ftc.gov

July 17, 2013

BY E-MAIL

Edward B. Schwartz, Esq.
Steptoe & Johnson, LLP
1330 Connecticut Avenue, NW
Washington DC 20036
eschwartz@steptoe.com

RE: FTC v. The Western Union Company, et al., 13-mc-0131-AKH (S.D.N.Y. 2013)

Dear Ed:

I am writing in regard to Western Union's compliance with Judge Hellerstein's Order dated June 7, 2013 (June 7 Order), enforcing the FTC's Civil Investigative Demand. As you know, we have been discussing the means by which Western Union will comply with each of the Specifications in the CID.

Specification 1

This specification calls for "all documents referring or relating to complaints made to Western Union by consumers anywhere in the world, referring or relating to fraud-induced money transfers." In the June 7 Order, Judge Hellerstein declined to require Western Union to produce those complaints that related to purely foreign transfers, but he enforced this specification with respect to complaints about transfers that were either sent from or received in the United States.

Thus far, Western Union has not produced any information responsive to Specification 1, except for the limited complaint data it had already provided to the FTC's Consumer Sentinel database. In follow-up discussions, the company has proposed producing complaints along with data from data fields that accompany each complaint. Western Union has provided the FTC a list of these data fields.

Upon review of the information provided by Western Union, the FTC has determined that Western Union should produce all of the responsive complaints – *i.e.*, complaints related to fraud-based money transfers that originate from or are received in the United States – along with

the accompanying data in each of the fields maintained by Western Union. We have reached this determination for several reasons.

First, Judge Hellerstein's June 7 Order simply directed Western Union to comply with Specification 1, which calls for all documents referring or relating to complaints, and it appears that Western Union captures all of the data in various fields along with each complaint. Therefore, production of the complaint in compliance with the June 7 Order would necessarily involve production of the data in the accompanying fields. Second, to the extent that we can identify the type of data collected in the various fields, these all appear to contain information reasonably relevant to the investigation. Third, production of all of the data fields should actually be less burdensome on Western Union than producing only selected fields.

Western Union should produce this information without further delay, and in any event, no later than July 24, 2013. In addition, Western Union has indicated that there may be additional sources of information responsive to Specification 1. Western Union should confirm whether these additional sources exist and produce any responsive information by that same date.

Specification 2

Specification 2 calls for "[a]ll documents referring or relating to communications with the Monitor appointed by the court in *State of Arizona ex rel. Horne v. Western Union Financial Services, Inc.*" Responding to Western Union's claim of potential burden from the production of electronic information responsive to this specification, Judge Hellerstein's June 7 Order established an iterative procedure for Western Union's compliance. Under the Order, Western Union would provide the FTC a proposed protocol for searching for responsive documents. The FTC could then respond with additional search terms and/or custodians, after which Western Union would have five days to advise the FTC if any of the additional search terms or custodians were over- or under-inclusive, supporting its position with specific reasons and supporting data.

Pursuant to the Order, Western Union provided its proposed protocol on June 20, 2013. In this protocol, Western Union proposed searching for records reflecting direct communications with the Monitor and his team by searching for e-mail from ten individuals associated with the Monitor.¹ Western Union further proposed searching for records from Western Union employees who regularly interacted with the Monitor by searching only the e-mail of ten custodians. Western Union also proposed conducting these searches using only seven search terms and to search for these terms in conjunction with ten limiting terms. Thus, for instance, Western Union proposed using "the Monitor" as a search term, and searching for this term within five words of other limiting terms such as "tell," "say*," or "said."

Western Union's proposed search protocol is plainly inadequate to enable the company to identify and produce "all documents referring or relating to communications with the Monitor" For example, Western Union's proposed protocol omitted several individuals and

¹ One of these is not an individual, but an e-mail address: "WUmonitor@gmail.com."

and e-mail addresses that were associated with the Monitor's team. Western Union's proposed protocol also omitted many Western Union employees who were directly and plainly identified by name in the Monitor's reports as interacting with the Monitor, including attending meetings or conferences described in the attachments to the reports. Finally, Western Union's proposed protocol omitted members of Western Union's management team and board of directors who would or should have been aware of the Monitor's reports and recommendations and who, by virtue of their positions, would have had the ultimate decision-making authority as to those recommendations.

Western Union's proposal was also inadequate in other aspects. As with the proposed custodians, Western Union omitted search terms reflecting key concepts and issues being evaluated by the Monitor which appear prominently in the Monitor's reports. And, more critically, Western Union proposed to search for only e-mail. The proposal did not include other electronic documents, even though such documents are a routine part of day-to-day business and are a standard part of any production in response to a CID.

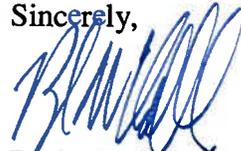
Attached is the FTC's response pursuant to the June 7 Order. We have developed this response based on our detailed review and consideration of the Monitor's reports. As you will note, this response provides a more comprehensive list of the custodians who interacted with the Monitor and/or his team and who are therefore likely to have records relating to the Monitor's reports. The response similarly revises the search terms and limiting terms to be employed in searching. These changes are necessary to correct the omissions in Western Union's proposal noted above and to enable Western Union to identify and produce all responsive documents. The response also clarifies that Western Union should use the protocol to search all electronic documents, including, but not limited to e-mail, memoranda, correspondence, spreadsheets, charts, diagrams, Power Points, and others.²

² With respect to hard copy documents, Western Union proposed to search and produce responsive, non-privileged documents from the custodians it identified. The FTC agrees that Western Union should search for and produce hard copy documents, but adds in its response that Western Union should search the hard copy documents of all of those custodians identified by the FTC.

Under the terms of the June 7 Order, Western Union now has five days, or by Monday, July 22, to advise the FTC if any of these additional custodians or terms are either over- or under-inclusive. The FTC will then respond to this information to advise Western Union of its obligations to produce the responsive information.

Please feel free to contact me if you have any questions.

Sincerely,



Burke W. Kappler

Attachment ("Att")

cc:

Chong Park, Esq. (by e-mail to cpark@step toe.com)

Todd Kossow, Esq. (by e-mail to tkossow@ftc.gov)

Karen Dodge, Esq. (by e-mail to kdodge@ftc.gov)

Leslie Rice Melman (by e-mail to lmelman@ftc.gov)

FTC Response to Search Protocol

I. Records reflecting communications between the Monitor and Western Union

- A. Western Union should not limit its electronic searches, as proposed, to its “email journaling system.” Instead, it must also locate any other electronic documents in its records, including, but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive. This includes any non-identical drafts of any such documents.

With respect to Western Union’s electronic searches for communications with the Monitor or members of the Monitor’s team, its searches should include the following individuals, email addresses associated with these individuals, and other email addresses:

Western Union’s proposal:

1. Lonnie Keene
2. Ted Greenberg
3. Dennis Lormel
4. Wyn Clark
5. Paul Lewis
6. Lisa Dawson
7. John Knapp
8. John Bell
9. Douglas Meadows
10. WUmonitor@gmail.com

FTC’s additions:

11. Reynold Benjamin
12. Rachele Byrne
13. Ricki Conrey
14. Matt Derstine
15. John DeWulf
16. Steven Escaravage
17. JD Hannick
18. Jeff Hunter
19. Frederick R. Kessler
20. Michael Ledley
21. Patrick Mahon
22. Nick Nahas
23. Sarah Schuyler
24. Robert Silbering
25. Ernest Sohn

26. Any other person that Western Union knows to be a current or former member of the Monitor's team or of the consulting group hired by the Monitor.
27. WUmonitor.com
28. WUmonitor2012@gmail.com

II. Records referring or relating to communications with the Monitor

- A. As described in I. A., above, Western Union should not limit its searches, as proposed, to its "email journaling system," but must instead search all electronic documents, including, but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive. For purposes of its electronic searches, Western Union must also include all of the electronic records for the following current or former employees, or members of management or the board of directors, regardless of whether they interacted directly with the Monitor or members of the Monitor's team.³ It is not appropriate, as Western Union has proposed, to limit the searches to employees or representatives who interacted with the Monitor on a "regular" basis.

Western Union's proposal:

1. Richard Krollman
2. Blaine Newby
3. Joe Cachey
4. Jeannie Larsen
5. Alma Angotti
6. Hollis Baugh
7. Luis Alvarez
8. Troy Deering
9. Barry Koch
10. Cherie Axelrod

FTC's additions:

11. Ken Allen
12. Diego Alvarez
13. Scott Apodoca
14. Johann Arias
15. Nikki (or Nicole) Ayres (or Ayers)
16. Wendy Barnard
17. Ann Barrett
18. Janet Baughman
19. Matt Bennett

³ Western Union's searches should include any variations on the names listed.

20. Mike Bingham
21. Michele Bixel
22. Alejandro Bolanos
23. Fabrice Borsello
24. Tarcisio Bortoletto
25. Noel Brandt
26. Kathleen Butler
27. Bob Cambron
28. Phillip Carratala
29. Susan Carter
30. Andrea Castle
31. David Cebellero
32. Erik Cheung
33. Wilson Davis
34. Pamela DeTorio
35. Patty Demmit
36. Kathy Desmond
37. John Dick
38. Eric Dieffenbach
39. Patrick Driver
40. John Dye
41. Susan Eberly
42. Jennifer Engerman
43. Robert Enzaldo
44. David Fallek
45. Victor Fernandez
46. Kenneth Fleenor
47. Silvia Francos
48. Rosemary Gallagher
49. Bryant Gofstein
50. Cathy Gomez
51. Krista Griffith
52. Ruben Guerrero
53. Alec Hall
54. Joe Haughton
55. Michael R. Hawkins
56. Mary Margaret Henke
57. Behrooz Heshmaty
58. David Holcomb
59. Phil Hopkins
60. Rosa Iglesias
61. Niall Kearney
62. David Keene
63. David Kehn
64. Niren Kinikar
65. Sean Knudson

66. Paula Larson
67. Kyle Lee
68. Dana Lensing
69. Leslie Leuenberger
70. Phil Ley
71. Kathy Linsman
72. Irma Lockridge
73. Nathen Lods
74. Victoria Lopez-Negrete
75. Ryan McLaughlin
76. Claudia Maldonado
77. Stacy Marrufo
78. Becky Mayfield
79. Maggie Metzler
80. James Middleton
81. Brian Midkiff
82. Hiran Modi
83. Alfred Moresi
84. Eli Morillo
85. Terry Murphy
86. Steve Nasalroad
87. Tom Nieto
88. Cort Norman
89. Roberto Ochoa
90. Nathan Old
91. Jean Lewis Pederson
92. Linda Porter
93. Mark Porter
94. Diana Portillo
95. Kristin Pullar
96. Laura Rau
97. Ana Rojas
98. Scott Schubert
99. Amit Sharma
100. Heather Shull
101. David Shapiro
102. Shannon Sisler
103. Ryan Spetosky
104. Robert Staggs
105. Stewart Stockdale
106. Srinivas Surapaneni
107. Heather Terning
108. Karen Thompson
109. Patricia Torres
110. Zenaldo Torres
111. Valerie Towery

112. Joel Tyler
113. Valdis Undiks
114. Patti Wyckoff
115. All present and former members of Western Union's management team during the time period covered by the CID, including:
 - a. Hikmet Ersek
 - b. Raj Agrawal
 - c. Odilon Almeida
 - d. John R. Dye
 - e. Jean Claude Farah
 - f. Khalid Fellahi
 - g. Robin Heller
 - h. Jan Hillered
 - i. Victoria López-Negrete
 - j. Scott T. Scheirman
 - k. Diane Scott
 - l. John David Thompson
 - m. Drina Yue
 - n. Luella Chavez D'Angelo
 - o. Richard William
116. All present and former members of Western Union's board of directors during the time period covered by the CID, including:
 - a. Jack M. Greenberg
 - b. Dinyar S. Devitre
 - c. Hikmet Ersek
 - d. Richard A. Goodman
 - e. Betsy D. Holden
 - f. Roberto G. Mendoza
 - g. Michael A. Miles, Jr.
 - h. Wulf von Schimmelmann
 - i. Solomon D. Trujillo

When searching the files of the named individuals, Western Union should search for variations (including, if applicable, nicknames) of their names. In other words, it should not limit its searches to perfect matches.

- B. Western Union should search all electronic documents, and not just its "email journaling system," including but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive. In addition to searching the subject line and body of emails, Western Union must also search the content of any other electronic documents for any of the following terms. When conducting electronic searches, Western Union should ensure that the search captures any portion of the foregoing names or words and must not be case sensitive. For example, when searching for the term "Monitor," the search must include the

following variations: “monitor,” “monitor’s,” “monitors’,” “Monitor’s” and “Monitors’.”

Western Union’s proposal:

1. “the Monitor”
2. “SWB Monitor”
3. “Monitorship”
4. “Lonnie”
5. “Keene”
6. “Ted”
7. “Greenberg”

FTC’s additions:

8. “Monitor”
9. “SWBA Monitor”
10. Any reference to any of the names in Section I.A. above
11. “Implementation Plan”
12. “Periodic Review”
13. “MIP”
14. “Recommendation”
15. “5%”
16. “5 %”
17. “5 percent”
18. “5 per cent”
19. “five percent”
20. “five per cent”
21. “risk assessment”
22. “KYA”
23. “know your agent”
24. “agent oversight”
25. “interdiction”
26. “WUBS”
27. “Western Union Business Solutions”
28. “WU Business Solutions”
29. “Business Solutions”
30. “Travelex”
31. “Custom House”
32. “prepaid”
33. “pre-paid”
34. “money order”
35. Any other term that Western Union knows would be reasonably likely to identify responsive documents. As Judge Hellerstein noted at the May 28, 2013 hearing, any search terms “will not limit what is relevant.” (Tr. at 26.)

C. Limiting terms:

Western Union should pair the above-listed search terms with the following limiting terms, but should expand its searches to within 10 words of each of the limiting terms:

Western Union's proposal (with the modification of w/10):

1. w/10 tell
2. w/10 say*
3. w/10 said
4. w/10 told
5. w/10 respon*
6. w/10 request*
7. w/10 demand*
8. w/10 ask*
9. w/10 wrote
10. w/10 writ*

FTC's additions:

11. w/10 recommend*
12. w/10 state*
13. w/10 talk*
14. w/10 spoke*
15. w/10 call*
16. w/10 email*
17. w/10 e-mail*
18. w/10 review
19. w/10 report*
20. w/10 evaluat*
21. w/10 plan
22. w/10 request*
23. w/10 propos*
24. Any other term that Western Union knows would be reasonably likely to identify responsive documents. As Judge Hellerstein noted at the May 28, 2013 hearing, any search terms "will not limit what is relevant." (Tr. at 26.)

III. Conduct of searches

As explained above, Western Union should not limit its electronic searches to emails. It must also include all other electronic documents, as described above.

IV. Conduct of searches for hard copy documents

Western Union must search the hard copy documents of all of the individuals listed in section II.A. above for documents that are responsive to CID Specification 2.

CONTEMPT EXHIBIT 4

Letter from Edward B. Schwartz (Western Union)
to Burke W. Kappler (FTC)

July 22, 2013

Edward B. Schwartz
202 429 6220
eschwartz@steptoe.com



1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

July 22, 2013

BY E-MAIL AND REGULAR MAIL

Burke W. Kappler, Esq.
Office of General Counsel
U.S. Federal Trade Commission
Washington, D.C. 20580

**Re: Federal Trade Commission Civil Investigative Demand
to The Western Union Company Issued December 12, 2012**

Dear Burke:

I am writing in response to your July 17, 2013 letter. I note preliminarily that it was impossible for Western Union to respond fully to the FTC's counter-proposal within five days (which, we note, included a weekend), as was required under the schedule the FTC proposed, and that was adopted by Judge Hellerstein. I note in this regard that the FTC was required under Judge Hellerstein's Order to respond to Western Union's June 20 search protocol proposal in "a timely fashion." The FTC took 27 days to do so. Clearly, if 27 days constituted a "timely" response on the FTC's part, the five days provided to Western Union to respond is, to say the least, unreasonable.

Nevertheless, Western Union has done its best to respond to the FTC's counter-proposal as fully as possible. This response will address the FTC's proposal regarding Specification 2. Western Union will supplement this response as soon as it is reasonably able with respect to its response to the Commission's proposal relating to Specification 1, and to address the outstanding issues, including the burden associated with the FTC's proposal. We expect to be able to respond further by the end of this week with respect to the issues relating to Specification 1 and our timing for responding with respect to the burdens associated with responding fully in accordance with the FTC's proposed protocols relating to Specification 2. As to the latter, our current estimate is that we can provide this information by COB next Wednesday. Western Union requests that the FTC agree to that timetable. If the FTC chooses to attempt to hold Western Union to the five-day deadline under these circumstances, Western Union reserves the

Burke W. Kappler, Esq.
July 22, 2013
Page 2

right to raise additional objections or other issues it uncovers after sending this response. Subject to that caveat, Western Union responds as follows.

Your letter contends that “Western Union’s proposed search protocol is “plainly inadequate to enable the company to identify and produce” documents responsive to Specification 2. Western Union disagrees. Western Union’s proposed search protocol identified all custodians and search terms that Western Union believed in good faith might contain relevant, non-duplicative information. Western Union’s approach was fully consistent with its obligation under the Federal Rules and other relevant authorities. *See, e.g.*, THE SEDONA PRINCIPLES (SECOND EDITION): BEST PRACTICES RECOMMENDATIONS & PRINCIPLES FOR ADDRESSING ELECTRONIC DOCUMENT PRODUCTION Comment 2(c) (“the Rules do not require the identification of all inaccessible sources of electronically stored information, but only those that the producing party believes in good faith may contain relevant, non-duplicative information.”). Thus, Western Union’s protocol satisfied its obligations.

The FTC, on the other hand, has requested search terms and custodians without regard to the likelihood that any particular search might be fruitful. We are disappointed, of course, that the staff has chosen this approach by, for example, proposing an 11-fold increase in the number of custodians whose documents and data would need to be searched, and by including in that list scores of individuals as to whom the Commission cannot possibly have a good faith basis for believing that those files are reasonably likely to contain non-duplicative, responsive material. The overbreadth of the Commission’s proposal is then multiplied dramatically by the list of search terms that it proposes. In short, the FTC has not complied with its obligations under the Federal Rules of acting in good faith to obtain through discovery the electronic and other documents that it is seeking without imposing an undue and unreasonable burden on Western Union.

The following sections address the two elements of the FTC’s proposed protocol.

I. Records Reflecting Communications Between the Monitor and Western Union

The FTC’s introductory paragraph on page Att-1 proposes various requirements. Western Union will comply with the requirements to the extent they do not expand the requirements of the CID, subject to the caveats below.

Western Union agrees to add to its email journaling system search the individuals on lines 11-25 on Att-1 of the FTC’s July 18, 2013 letter, with the exception of Rachele Byrne (line 12 on Att-1), Patrick Mahon (line 21 on Att-1) and Sarah Schuyler (line 23 on Att-1), whose email addresses Western Union has not been able to identify. Those addresses are needed to search for the emails to or from those individuals. If the FTC provides the email addresses for those individuals, Western Union will analyze the burden associated with including them in the search.

Burke W. Kappler, Esq.
July 22, 2013
Page 3

Western Union also agrees to add the email address on Att-2 line 28. We are not aware of anyone fitting the description on Att-2 line 26.

Western Union's email journaling system does not support domain searches. A complete email address is necessary for email searches. Therefore, Western Union will not include wumonitor.com line 27 on Att-2 in its search.

II. Records Referring or Relating to Communications with the Monitor

The FTC's introductory paragraph on page Att-2 proposes various requirements. Western Union will comply with the requirements to the extent they do not expand the requirements of the CID, subject to the caveats below.

As noted above, the Court's June 7, 2013 Order does not give Western Union sufficient time to analyze the obligations imposed by the FTC's proposed protocol, particularly given the nature and scope of the FTC's additions. We respond below to the Commission's proposal to the extent that it was possible to do so within the time permitted.

A. Additional Custodians

Western Union agrees to add the following names to its email journaling system search, based upon their involvement with the Monitor: Nicole Ayres (15), Janet Baughman (18), Mike Bingham (20), Tarcisio Borteletto (24), Noel Brandt (25), Phillip Carratala (28), Kathy Desmond (36), Eric Dieffenbach (38), Robert Enzaldo (43), Rosemary Gallagher (48), Bryant Gofstein (49), Alec Hall (53), David Holcomb (58), Phil Hopkins (59), Niren Kinikar (64), Claudia Maldonado (76), Becky Mayfield (78), Ryan McLaughlin (75), Steve Nasalroad (86), Linda Porter (92), Kristin Pullar (95) and Valerie Towery (111).

B. Objections to Additional Custodians and Search Terms

The FTC proposes adding 118 people to the list of search custodians on the basis that (1) certain of the employees were "directly and plainly identified by name in the Monitor's reports as interacting with the Monitor, including attending meetings or conferences described in the attachments to the reports;" and (2) the list must include members of Western Union's management team and board of directors "who would or should have been aware of the Monitor's reports and recommendations and who, by virtue of their positions, would have had the ultimate decision-making authority as to those recommendations."

The FTC appears to have included in its proposed custodian list anyone whose name appeared on a Monitor report, without regard to the likelihood of that individual having responsive, relevant and non-duplicative documents in his/her files. The FTC's proposal is, in this regard, inappropriate and inconsistent with the Federal Rules.

Burke W. Kappler, Esq.
July 22, 2013
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In particular, Western Union disagrees with the proposition that anyone whose name appears in a Monitor report must be included on the search list Western Union. Nor does Western Union believe that all of the additional custodians interacted with the Monitor to a degree that warrants a search of their documents. Rather, a variety of factors must be analyzed in determining whether it is appropriate to include a custodian on the search list, including the extent of a custodian's interaction with the Monitor and the custodian's role in the Company and with regard to the Southwest Border Agreement. Thus, although a Monitor report may indicate that a proposed custodian was present at a meeting with the Monitor, the proposed custodian may not have had any interaction with the Monitor.

Western Union also disagrees with the proposition that the search list must include those "who would or should have been aware of the Monitor's reports and recommendations and who, by virtue of their positions, would have had the ultimate decision-making authority as to those recommendations." For example, several of the people the FTC claims are in that category have no responsibility for the Southwest Border (e.g., Jean Claude Farah, (115.e.), based in Dubai and oversees the Middle East and Africa, Jan Hillered (115.h), based in Vienna, Austria and oversees Europe and the Commonwealth of Independent States and Drina Yue (115.m.), based in Hong Kong and oversees Asia-Pacific). Therefore, the burdens associated with the searches of their documents outweigh the likely benefits. *See* Fed.R.Civ.P. 26(b)(2)(C)(iii). As a result, those custodians should be removed from the search list.

For the same reason, custodians who work outside the U.S. (e.g., Diego Alvarez (12), Johann Arias (14), Alejandro Bolanos (22),¹ Fabrice Borsello (23), Silvia Fancos (47), Ruben Guerrero (52), Rosa Iglesias (60), Diana Portillo (94), Ana Rojas (97), Patricia Torres (109) and Zenaido Torres (110)) should be removed from the search list.

In addition, the FTC's proposed custodian list includes personnel who work in the Human Resources Department and whose connection to the Southwest Border Program is, at best, limited (e.g., Paula Larson (66), Irma Lockridge (72), Shannon Sisler (102), Karen Thompson (108) and Richard Williams (115.o.)). Thus, they should be removed from the search list as well.

Similarly, a number of the FTC's proposed custodians were contractors who are no longer working on the Southwest Border Program (e.g., Bob Cambron (27), Andrea Castle, (30), Maggie Metzler (79), James Middleton (80), Alfred Moresi (83), Robert Staggs (104)). They are not likely to have non-duplicative materials.

¹ Western Union has identified two people who are named Alejandro Bolanos: Alejandro Bolanos Alfaro, who is an Off-Line Service Specialist in Costa Rica, and Alejandro Bolanos Garcia, who is a Vendor Relations Manager in Mexico. Please identify which of those two the FTC is proposing as an additional custodian.

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July 22, 2013
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There are a number of other custodians whose interactions with the Monitor may have been nonexistent or limited. However, the five days Western Union had to respond to the FTC's proposal was not sufficient to investigate those interactions or determine the burdens associated with those searches.

Western Union's ability to analyze the burdens associated with the FTC's proposal also has been hampered by the cumbersome nature of the FTC's proposal. For one, the FTC's proposal includes 118 additional names, 27 additional multi-word search terms and 13 additional limiting terms. In addition, it includes numerous employees who are no longer with the Company. A multi-step process must be completed before Western Union can search for their email. Moreover, a number of the names on the FTC's list are or appear to be misspelled and require additional research. In addition, because of maintenance, Western Union's email journaling system was not available for searching during a large portion of the five-day response period. As a result, Western Union has not been able to complete the searches that will enable the Company to determine the burden associated with the FTC's proposal.

In addition, Western Union's email journaling system does not support searches for "%." Therefore, Western Union cannot include the terms "5%" or "5 %" on lines 15 and 16 of page Att-6 in the search.

Western Union also objects to the FTC's additional term "money order" (34). The Arizona settlement agreement concerns money transfers, not money orders. Therefore, the Monitor has no jurisdiction over Western Union's money order business.

Western Union also objects to the FTC's additional term 35 and limiting term 24, both of which obligate Western Union to use "[a]ny other term that Western Union knows would reasonably be likely to identify responsive documents." The Court's June 7, 2013 order does not impose such an obligation; nor is Western Union aware of any authority imposing such an obligation. Therefore, Western Union does not agree to those additions.

III. Conduct of Searches

As indicated in our June 20, 2013 letter, Western Union will review the results of the searches in sections I and II and will remove email (1) that is not responsive to CID Specification No. 2; (2) that is duplicative; or (3) that is responsive to CID Specification No. 2 but that is subject to a privilege. Western Union will identify on a privilege log email that is subject to a privilege. Western Union will produce the remainder.

IV. Conduct of Searches for Hard Copy Documents

As indicated in our June 20, 2013 letter, Western Union will search for hard copy documents of the agreed-upon custodians for documents that are responsive to CID Specification

Burke W. Kappler, Esq.
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No. 2. Western Union will produce the responsive, non-privileged hard copy documents and will identify privileged documents on a privilege log.

V. Conduct of Searches for Electronic Documents

Western Union will search the electronic documents of the agreed upon custodians for documents that are responsive to CID Specification No. 2. Western Union will produce the responsive, non-privileged hard copy documents and will identify privileged documents on a privilege log.

VI. Meet and Confer

Western Union believes it would be productive for the parties to meet and confer in the next few days about the search protocol. If the FTC agrees, please let me know your availability.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. B. Schwartz".

Edward B. Schwartz

CONTEMPT EXHIBIT 5

Letter from Edward B. Schwartz (Western Union)
to Burke W. Kappler (FTC)

August 7, 2013

Edward B. Schwartz
202 429 6220
eschwartz@step toe.com



1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.step toe.com

August 7, 2013

BY E-MAIL AND REGULAR MAIL

Burke W. Kappler, Esq.
Office of General Counsel
U.S. Federal Trade Commission
Washington, D.C. 20580

**Re: Federal Trade Commission Civil Investigative Demand
to The Western Union Company Issued December 12, 2012**

Dear Burke:

I am writing to follow up on our meeting and conversations last week. As Jose and I indicated, the FTC's proposed protocol for Specification 2 poses a number of technical challenges and burdens. We have been working with UnitedLex, an electronic discovery vendor, to help us find solutions for these challenges and better understand the burdens associated with the FTC's proposed protocol for Specification 2.

Western Union is still trying to determine the number of emails that will have to be reviewed for the 32 custodians who had the most contact with the Monitor. Unfortunately, Western Union's email journaling system's search and export capabilities are limited. In addition, EMC, the vendor that manufactured the email journaling system, has been upgrading it over the past several months. As a result, Western Union and UnitedLex have been unable to (1) get an exact count of the number of emails it has for each of the 32 custodians; or (2) run any of the search terms. What we have been able to project is that there are approximately 6 million emails for the 32 custodians for the period January 1, 2011 through July 31, 2013. Based on a sample of Richard Krollman's emails, we project that there will be approximately 1,750 gigabytes of email and attachments for the 32 custodians. Western Union and UnitedLex are still working to refine these estimates.

UnitedLex must ingest the data before search terms can be applied. Assuming the 1,750 gigabyte estimate is accurate, UnitedLex has advised Western Union that the cost to ingest that amount of data will be \$90 per gigabyte: \$157,000 for 1.7 terabytes. That, of course, does not

Burke W. Kappler, Esq.
August 7, 2013
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include the cost of collecting, processing, reviewing and producing the emails, the cost of which we project will be no less \$3.2 million.

Western Union is facing another challenge that we discovered late last week. Western Union's email journaling system extracts email at a rate of approximately one gigabyte per hour. As a result, once the extraction begins it will take approximately one month (working 7 days a week and assuming no errors or technical problems during the extraction) to extract the data for the 32 custodians, assuming the 1,750 gigabyte estimate is accurate. Western Union's Information Technology personnel are conferring with UnitedLex and EMC to determine whether the extraction rate can be increased. We will let you know the outcome of those discussions.

Attorneys from Steptoe and Johnson and UnitedLex personnel will be in Denver next week to begin the collection of electronic and hard copy documents. The vast majority of the 32 custodians are, or were, located in Denver. After that material is collected, UnitedLex will process it so that the search terms can be applied. Since the material has not been collected, we do not know the cost for processing it.

Please let me know when you are available to discuss the search protocol and these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "E. B. Schwartz".

Edward B. Schwartz

CONTEMPT EXHIBIT 6

Letter from Burke W. Kappler (FTC)
to Edward B. Schwartz (Western Union), with attachment

August 8, 2013



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Burke W. Kappler
Attorney
Office of General Counsel

Direct Dial: 202-326-2043
Fax : 202-326-2477
E-mail: bkappler@ftc.gov

August 8, 2013

BY E-MAIL

Edward B. Schwartz, Esq.
Steptoe & Johnson, LLP
1330 Connecticut Avenue, NW
Washington DC 20036
eschwartz@steptoe.com

RE: FTC v. The Western Union Company, et al., 13-mc-0131-AKH (S.D.N.Y. 2013)

Dear Ed:

I am writing in regard to our discussions about Western Union's compliance with Specification 2 of the Civil Investigative Demand enforced by Judge Hellerstein on June 7, 2013 (June 7 Order).¹ To provide some context for this letter, I think it will be helpful to first review our prior communications regarding Western Union's compliance with the Court's Order.

A. Judge Hellerstein's enforcement order (June 7, 2013) and Western Union's proposed protocol (June 20, 2013)

As you know, Specification 2 calls for "[a]ll documents referring or relating to communications with the Monitor appointed by the court in *State of Arizona ex rel. Horne v. Western Union Financial Services, Inc.*" Judge Hellerstein's June 7 Order established an iterative procedure for Western Union's compliance. Specifically, the Order required Western Union to provide the FTC a proposed protocol for searching for responsive documents, to which the FTC could then respond with additional search terms and/or custodians. Western Union would then have 5 days to advise the FTC if any of the additional search terms or custodians

¹ Western Union produced documents responsive to Specification 1, which calls for "all documents referring or relating to complaints made to Western Union by consumers anywhere in the world, referring or relating to fraud-induced money transfers[.]" on July 30, 2013. As I advised Jose Gonzalez-Magaz by telephone on August 2, 2013, our preliminary review of this production suggests that it is incomplete. Our review is ongoing, however, and we will be in touch shortly on any specific deficiencies.

were over- or under-inclusive “with a statement of specific reasons for its position and supporting data”

Pursuant to the Order, Western Union provided a proposed protocol on June 20, 2013. In this protocol, Western Union proposed searching for records reflecting direct communications with the Monitor and his team by searching for e-mail from 10 individuals associated with the Monitor. Western Union further proposed searching for records from Western Union employees who regularly interacted with the Monitor by searching the e-mail of only 10 custodians. Western Union proposed such a limited search despite the fact that it represented to the Court that there were “no fewer than 57 custodians whose e-mails would have to be searched.” (Tr. at 24.) Western Union also proposed conducting these searches using only 7 “base” search terms and to search for these terms in conjunction with 7 “limiting” terms.²

B. The FTC’s response to the proposed protocol (July 17, 2013) and Western Union’s objections (July 22, 2013)

On July 17, 2013, the FTC responded by proposing additional custodians and search terms. These additional custodians and terms were developed based on staff’s own review of the Monitor’s reports, as well as discussions with the Monitor regarding those representatives of Western Union with whom he and his team had contact, and the contents of the reports. For example, in addition to the 10 custodians proposed by Western Union, the Monitor identified another 104 Western Union employees in his reports as having substantive contact with him or members of his team. Together with members of Western Union’s management team and board of directors – those who would or should have been aware of the Monitor’s evaluations and recommendations and who would have had responsibility for overseeing Western Union’s implementation of changes recommended by the Monitor – that brought the total number of the FTC’s suggested custodians to 136 individuals.³ The FTC also proposed a total of 28 additional base search terms and 14 additional limiting search terms, which reflected key synonyms or concepts identified in the Monitor’s reports.

You responded by letter dated July 22, 2013, and conveyed Western Union’s objections to several aspects of the FTC’s response. According to Western Union, the Commission’s response was overbroad and not consistent with the Federal Rules or with the Sedona Conference’s principles for electronic discovery. You stated that the Commission should not include any custodian named in one of the Monitor’s reports without analyzing the extent of that individual’s interaction with the Monitor and role at Western Union. And, despite admitted technical difficulties that hampered its ability to search its e-mail, the company objected to

² Western Union’s proposed protocol suggested searching for a limited set of “base” terms in Boolean conjunction with a set of “limiting” terms. The FTC agrees with this basic approach, but finds based on its review of the Monitor’s reports and discussions with the Monitor that both sets of terms must be expanded.

³ The FTC could have proposed that Western Union search for any employee with responsive documents, regardless of whether that individual was named in the Monitor’s reports -- a potentially much larger set of custodians. Instead, the FTC proposed searching the files of those named by the Monitor himself for documents relating to communications with the Monitor, which is a more limited, natural, and reasonable starting point.

specific search terms.⁴ Nonetheless, Western Union stated it was willing to include another 22 custodians from the FTC's list, for a total of 32 custodians. Finally, you proposed that counsel for Western Union and the FTC meet and confer regarding the FTC's response and next steps in developing a search protocol for documents responsive to Specification 2.

We met, even though we disagreed with a number of Western Union's premises. For instance, we disagreed that the relevant standard for assessing Western Union's compliance are the discovery rules in the Federal Rules of Civil Procedure. To the contrary, Western Union's compliance must be measured against the terms of Judge Hellerstein's June 7 Order. Similarly, though the Sedona Conference has produced helpful guidance on electronic discovery, the standard Western Union cited relates to a party's obligation to search and produce potentially duplicative information from secondary back-up tapes and other inaccessible storage media and is not relevant to Western Union's obligations to produce documents from reasonably accessible "first tier" custodians under the June 7 Order. We also disagreed that it is the FTC's burden to identify which custodians are most likely to have responsive information based on their interactions with the Monitor; by definition, Western Union has the best information regarding a given custodian's interaction with the Monitor and thus it is Western Union's burden to demonstrate why a particular proposed custodian is unlikely to have responsive information. Finally, we disagreed that the Commission's proposed protocol response was overbroad. In fact, in searching for documents related to communications with the Monitor, Western Union's task was limited to responding to only a single part of a single specification in a CID that itself contained only two specifications. Under these circumstances, the universe of responsive documents should not be difficult for Western Union to identify quickly.

C. Western Union's revised proposals (July 30, 2013)

Leslie Melman and I met with you and Jose on July 30, 2013. During the meeting, you explained that Western Union believed that searching for the custodians and terms proposed by the FTC would be highly burdensome. Though you did not provide extensive supporting data, you stated that 30 custodians could be expected to have 5 million e-mails. When Leslie and I asked how the FTC could identify who among the 114 Western Union employees identified in the Monitor's reports had sufficiently substantive interactions with the Monitor to justify their inclusion, you offered to provide more detailed information about each of the custodians. However, you also stated that such information would likely be time-consuming for Western Union to prepare and ultimately was not likely to be helpful. With respect to the search terms, you explained that the terms as provided by the FTC were similarly burdensome because they would be complicated to implement and would likely result in a large number of hits.

To resolve these issues, you proposed that the FTC consent to further reductions in the number of custodians, subject to the FTC's right to require additional, targeted searches if the

⁴ We understand that Western Union has resolved several of its technical objections to the search terms by retaining a vendor whose search capabilities exceed Western Union's own.

documents produced highlighted other individuals as likely to have responsive information.⁵ You also proposed that the FTC consent to reduce the number of search terms. Specifically, you proposed reducing the base search terms to a core set that referred to the Monitor, and then applying these terms in conjunction with various limiting terms.

D. The search protocol required for Western Union's compliance with the June 7 Order

Western Union has not provided any support for its request that the FTC consent to reductions in both the numbers of custodians and the numbers of search terms. To be clear, Western Union offered only limited information to justify such reductions in the July 22 letter, and has offered no further substantive information since our meeting on July 30. Notably, the company has not advised the FTC whether any of the search terms are "overinclusive or underinclusive, with a statement of specific reasons for its position and supporting data[,]" as required by the June 7 Order. Nonetheless, after undertaking a further review of each of the Monitor's reports and additional discussion with the Monitor, we have further limited the list of custodians and search terms that Western Union must use to comply with the Court's enforcement order. The final search protocol is attached to this letter.

As you will see, this represents a reduction of nearly 50%, from 136 to 74 key individuals. These include 61 employees identified in the Monitor's reports and 13 additional members of Western Union's management team. With respect to search terms, we accept in large part Western Union's proposal to use terms referring to the Monitor and his team as a core set of base terms to be used in conjunction with a set of limiting terms, and we have revised the limiting terms to reflect many of the key concepts included in the FTC's original response. In doing so, we reserve our rights to require Western Union to perform targeted searches for additional custodians or search terms once we have had the opportunity to review Western Union's initial production. You offered to do this during our July 30 meeting, and Judge Hellerstein explicitly ordered Western Union to do so in paragraph 15 of the June 7 Order.

The revised response also addresses search and production of electronic documents outside of e-mail, and search and production of hard copy, non-electronic documents. In addition, to the extent that Western Union is aware of documents that are responsive to the CID, but that somehow fall outside of the search protocol, Western Union is obligated to produce these documents, consistent with Judge Hellerstein's finding at the May 28, 2013 hearing that the search terms "will not limit what is relevant." (Tr. at 26.)

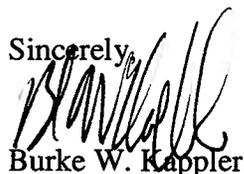
⁵ Jose Gonzalez-Magaz later confirmed by telephone that Western Union's vendor has the capability to run such targeted searches.

As I advised Jose Gonzalez-Magaz by telephone, this is the response contemplated by paragraph 14 of the June 7 Order. Accordingly, Western Union “shall accept the FTC’s response and, within 15 days of the FTC’s response, or at such later time as may be agreed by the FTC, produce all of the documents identified as a result of its execution of the protocol and the FTC’s response[.]”

While this letter was being prepared, we received your letter of August 7, advising us that Western Union had not yet begun to collect responsive information, that collection alone for a set of 32 custodians would require at least one month, not including review and production, and that the costs of the production from these 32 custodians could be expected to exceed \$3 million. We were surprised to receive this, as we had never consented to a set of 32 custodians and in fact told Western Union that we were undertaking a second review of the Monitor’s reports in conjunction with the information provided at the July 30 meeting. Indeed, we undertook such a detailed second look because we were cognizant of the costs to Western Union, though we note that many of these costs are attributable to Western Union’s own decisions to involve 114 employees with the Monitor’s assessments, and to employ its apparently cumbersome e-mail journaling system.

We were further surprised that Western Union had not previously undertaken to collect information from any custodians, given that Western Union was served with the CID around December 12, 2012, and has been bound by a federal district court enforcement order for over two months. We have reviewed this situation with our Principal Deputy General Counsel. At this point, we expect that Western Union will begin a rolling production of documents within 15 days and adhere to a schedule that provides for full and complete compliance no later than October 31, 2013.⁶

Sincerely,



Burke W. Kappler

Attachment (“Att”)

cc:

Jose Ramon Gonzalez-Magaz, Esq. (by e-mail to jrgonzalez@steptoe.com)

Chong S. Park, Esq. (by e-mail to cpark@steptoe.com)

Todd Kossow, Esq. (by e-mail to tkossow@ftc.gov)

Karen Dodge, Esq. (by e-mail to kdodge@ftc.gov)

Leslie Rice Melman (by e-mail to lmelman@ftc.gov)

⁶ Your August 7 letter states that Western Union will require at least a month to extract e-mail for 32 custodians. Thus, the rate of extraction is approximately one custodian per day. This letter identifies 74 custodians whose e-mails and documents are to be searched. 74 days from the date of this letter is October 21, 2013. Given the history of this matter and the information you have provided, October 31, 2013 is therefore a reasonable date for the FTC to expect full and complete compliance.

Protocol for Search and Production of Documents Responsive to Specification 2

I. Conduct of searches

As explained below, Western Union should not limit its electronic searches to emails. It must also include all other electronic documents.

In addition, to the extent that Western Union is aware of documents that are responsive to CID Specification 2 but that somehow fall outside of this search protocol, Western Union is obligated to produce those documents, consistent with Judge Hellerstein's finding at the May 28, 2013 hearing that the search terms "will not limit what is relevant." (Tr. at 26.)

II. Records reflecting direct communications between the Monitor and Western Union

A. The Monitor and his team members

Western Union's obligation to search for responsive materials extends beyond its "email journaling system." It must also locate any other electronic documents in its records, including, but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive. This includes any non-identical drafts of any such documents.

With respect to Western Union's electronic searches for communications with the Monitor or members of the Monitor's team, its searches should include the following individuals, email addresses associated with these individuals, and other email addresses:

Western Union's proposal:

1. Lonnie Keene
2. Ted Greenberg
3. Dennis Lormel
4. Wyn Clark
5. Paul Lewis
6. Lisa Dawson
7. John Knapp
8. John Bell
9. Douglas Meadows
10. WUmonitor@gmail.com

FTC's additions (with one modification – in bold below):

11. Reynold Benjamin
12. Rachele Byrne
13. Ricki Conrey
14. Matt Derstine
15. John DeWulf
16. Steven Escaravage

17. JD Hannick
18. Jeff Hunter
19. Frederick R. Kessler
20. Michael Ledley
21. Patrick Mahon
22. Nick Nahas
23. Sarah Schuyler
24. Robert Silbering
25. Ernest Sohn
26. **Email addresses ending in @WUmonitor.com**
27. WUmonitor2012@gmail.com

III. Records referring or relating to communications with the Monitor

A. Western Union custodians to be searched

Again, Western Union may not limit its searches to its “email journaling system,” but must instead search all electronic documents, including, but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive.

Western Union’s proposal (as revised by the July 22, 2013 letter):

1. Richard Krollman
2. Blaine Newby
3. Joe Cachey
4. Jeannie Larsen
5. Alma Angotti
6. Hollis Baugh
7. Luis Alvarez
8. Troy Deering
9. Barry Koch
10. Cherie Axelrod
11. Nicole Ayres
12. Janet Baughman
13. Mike Bingham
14. Tarcisio Bortoletto (or Borteletto)
15. Noel Brandt
16. Phillip Carratala
17. Kathy Desmond
18. Eric Dieffenbach
19. Robert Enzaldo
20. Rosmary Gallagher
21. Bryant Gofstein
22. Alec Hall
23. David Holcomb

24. Phil Hopkins
25. Niren Kinikar
26. Claudia Maldonado
27. Becky Mayfield
28. Ryan McLaughlin
29. Steve Nasalroad
30. Linda Porter
31. Kristin Pullar
32. Valerie Towery

FTC's revised additions:

33. Diego Alvarez
34. Johann Arias
35. Ann Barrett
36. Michele Bixel
37. Fabrice Borsello
38. Kathleen Butler
39. Bob Cambron
40. Andrea Castle
41. Erik Cheung
42. Wilson Davis
43. John Dick
44. Patrick Driver
45. John Dye
46. Susan Eberly
47. David Fallek
48. Silvia Francos (or Fancos)
49. Krista Griffith
50. Joe Haughton
51. Mary Margaret Henke
52. Rosa Iglesias
53. Niall Kearney
54. Victoria Lopez-Negrete
55. James Middleton
56. Roberto Ochoa
57. Jean Lewis Pederson
58. Mark Porter
59. Heather Shull
60. Stewart Stockdale
61. Valdis Undiks
62. All present and former members of Western Union's management team during the time period covered by the CID, including:
 - a. Hikmet Ersek
 - b. Raj Agrawal
 - c. Odilon Almeida
 - d. John R. Dye (included above)

- e. Jean Claude Farah
- f. Khalid Fellahi
- g. Robin Heller
- h. Jan Hillered
- i. Victoria López-Negrete (included above)
- j. Scott T. Scheirman
- k. Diane Scott
- l. John David Thompson
- m. Drina Yue
- n. Luella Chavez D'Angelo
- o. Richard William

When searching for any of the foregoing names, Western Union should search for variations (including, if applicable, nicknames) of those names. In other words, it should not limit its searches to perfect matches.

Consistent with the June 7, 2013 Order, the FTC reserves its right to identify additional custodians for targeted searches.

B. Base search terms

Again, Western Union must search all electronic documents, and not just its “email journaling system,” including but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive.

In addition to searching the subject line and body of emails, Western Union must also search the content of any other electronic documents for any of the following terms:

Western Union’s proposal:

- 1. “the Monitor”
- 2. “SWB Monitor”
- 3. “Monitorship”
- 4. “Lonnie”
- 5. “Keene”
- 6. “Ted”
- 7. “Greenberg”

FTC’s revised additions:

- 8. “Monitor”
- 9. “SWBA Monitor”
- 10. Any reference to any of the Monitor’s team listed in Section II.A. above

The FTC reserves its right to provide Western Union with additional base search terms after reviewing Western Union’s production.

C. Limiting terms

Western Union should expand its searches to the following limiting terms:

Western Union's proposal (with the modification of w/10):

1. w/10 tell
2. w/10 say*
3. w/10 said
4. w/10 told
5. w/10 respon*
6. w/10 request*
7. w/10 demand*
8. w/10 ask*
9. w/10 wrote
10. w/10 writ*

FTC's revised additions (which should not be case sensitive):

11. w/10 recommend*
12. w/10 state*
13. w/10 talk*
14. w/10 spoke*
15. w/10 call*
16. w/10 email*
17. w/10 e-mail*
18. w/10 review
19. w/10 report*
20. w/10 evaluat*
21. w/10 plan
22. w/10 request*
23. w/10 propos*
24. and Implementation Plan
25. and Periodic Review*
26. and MIP*
27. and Recommendation*
28. and 5%
29. and 5 %
30. and 5 percent
31. and 5 per cent
32. and five percent
33. and five per cent
34. and risk assessment*
35. and KYA
36. and know your agent
37. and agent oversight
38. and interdict*

- 39. and WUBS
- 40. and Western Union Business Solutions
- 41. and WU Business Solutions
- 42. and Business Solutions
- 43. and Travelex
- 44. and Custom House
- 45. and prepaid
- 46. and pre-paid
- 47. and money order

The FTC reserves its right to provide Western Union with additional limiting terms after reviewing Western Union's production.

IV. Conduct of searches for hard copy documents

Western Union must search the hard copy documents of all of the individuals listed in section III.A. above for documents that are responsive to CID Specification 2.

CONTEMPT EXHIBIT 7

Letter from Edward B. Schwartz (Western Union)
to Burke W. Kappler (FTC), with attachment

August 27, 2013

Edward B. Schwartz
202 429 6220
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Washington, DC 20036-1795
202 429 3000 main
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August 27, 2013

BY EMAIL AND REGULAR MAIL

Burke W. Kappler, Esq.
Office of General Counsel
U.S. Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

**Re: Federal Trade Commission Civil Investigative Demand to
The Western Union Company Issued December 12, 2012**

Dear Burke:

We are writing to follow-up on your letter dated August 8, 2013, and our subsequent telephone conference with you and Leslie that day. We think that the exchanges of views and information have been productive, and look forward to continuing to work with you as the Western Union Company continues in its efforts to comply with the CID and Judge Hellerstein's Order.

As we have previously communicated, the FTC's proposed protocol for Specification 2 of the CID poses enormous technical challenges and financial burdens for Western Union. The company continues to work with United Lex (www.unitedlex.com), an electronic discovery service provider, as well as its hardware supplier, to find solutions to the technical challenges. In that regard, we invite you – indeed, encourage you – to have your IT staff speak with the United Lex personnel to better understand and verify the technical challenges that Western Union is facing.

We address below some key issues that Western Union and the FTC must resolve to bring the volume of Western Union's electronically stored information ("ESI") that may be responsive to CID Specification 2 down to a reasonable and manageable level.

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I. The Number of Custodians

As I indicated in my letter of August 7, Western Union preliminarily projected a cost of no less than \$3.2 million to collect, process, review, and produce the emails for the 32 custodians listed on lines 1-32 of Att-2 to Att-3 of your August 8 letter (the “32 custodians”), given their estimated 6 million emails.

During our conversation on August 8, Leslie and you asked us to provide specific information to support Western Union’s position that the collection of emails per the 42 custodians listed on lines 33-62(o) of Att-3 to Att-4 to your August 8 letter (the “42 custodians”) and its proposed search and limiting terms, are far too broad to allow Western Union to reliably and cost-efficiently collect the emails responsive to CID Specification 2. To test Western Union’s view in this regard, the company extracted and United Lex processed and searched, per the FTC’s proposed protocol, the email for three custodians – Noel Brandt, Mark Porter, and Jean Claude Farah (respectively listed on lines 15, 58, and 62(e) of Att-2, Att-3 and Att-4 of your August 8 letter).¹ United Lex reports that:

- The email extracted for these three custodians amounted to 57 gigabytes; and its processing increased the volume to 113 gigabytes.
- The deduplication of the collection yielded 187,849 emails and 102,473 attachments, for a total of 290,322 files.
- The FTC’s base terms only hit on 47,573 of these files (about 16%).
- Running the FTC’s limiting terms reduced the number of files to 44,789. That is, the FTC’s limiting terms only eliminated 2,434 files (about 10%).
- Using the FTC’s list of base and limiting terms results in 1,692 different searches being performed.

As an additional measure to analyze the cost implications of the FTC’s request that Western Union also collect, process, review and produce the email of the 42 custodians, the company extracted the email of an additional eight custodians, and directed United Lex to

¹ These three custodians were selected as a sample, given the difference in the degree of their involvement with the SWB Monitor. The results verified that assumption, as one custodian (Brandt) was found to have a large number of files (16,575 files) per the August 8 search protocol; another (Farah) had a much smaller number of files (1,542); and the third (Porter) had a number in the middle range (5,438).

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perform the searches, as indicated in your letter, on files for the 11 custodians available.² This methodology yielded the following results (without deduplication):

Custodian	Number of GBs Compressed	Estimated Decompressed in GBs	Number of Messages	Total Estimated Attachments	Total Documents	Total Estimated for Review (After Term Searches and Deduplication; Assumed 13% Hits of Total Documents)
Hopkins	29.9	59.1	155,844	85,714	241,558	31,403
Ochoa	86.7	171.6	240,096	132,053	372,149	48,379
Baugh	8.9	17.6	47,296	26,013	73,309	9,530
Holcomb	26.7	52.9	181,178	99,648	280,826	36,507
Enzaldo	13.4	26.5	48,188	26,503	74,691	9,710
Carratala	23.4	46.3	97,036	53,370	150,406	19,553
Cachey	12.4	24.5	95,770	52,674	148,444	19,298
Kearney	11.0	21.8	50,192	27,606	77,798	10,114
Brandt	21.6	42.8	318,612	175,237	493,849	64,200
Farah	12.0	23.8	37,526	20,639	58,165	7,561
Porter	23.6	46.8	110,709	60,890	171,599	22,308
Totals	269.5	533.6	1,382,447	760,346	2,142,793	278,563
Averages per Custodian	24.5	48.5	125,677	69,122	194,799	25,324
Extrapolation to 74 Custodians	1,814	3,591	9,303,868	5,117,128	14,420,996	1,874,729

Thus, for only 11 custodians, the email search protocols set forth in the FTC's August 8 letter resulted in an estimated 278,563 files that would have to be reviewed. Extrapolating to 74 custodians, that volume is projected to balloon to 1,874,729 files. Based on such data from United Lex, Western Union projects a cost of no less than \$3.72 million to collect, process, deduplicate, review, and produce the emails for the 74 custodians as sought by the FTC, given their estimated 1.9 million emails to be reviewed for the period of more than two-and-a-half years covered by the CID. This is an unjustifiable and unacceptable burden on Western Union.

² The additional eight custodians are Hollis Baugh (line 6 on Att-2 of your August 8 letter), Joe Cachey (line 3 on Att-2), Phillip Carratala (line 16 on Att-2), Robert Enzaldo (line 19 on Att-2), David Holcomb (line 23 on Att-2), Phil Hopkins (line 24 on Att-3), Niall Kearney (line 53 on Att-3), and Roberto Ochoa (line 56 on Att-3).

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Western Union should not be subjected to an expense of that magnitude, especially since, if the additional 42 custodians had email responsive to Specification 2 of the CID, such email likely would be found among those of the 32 custodians, who have had a more significant involvement with the SWB Monitor and his team.³ It bears remembering that Specification 2 of the CID seeks “[a]ll documents referring or relating to *communications with the Monitor...*” Specification 2 does not seek all documents “referring or relating to *the Monitor.*” It follows that those 32 custodians who have had the most direct involvement with matters related to the SWB Monitor are the most likely to have communications with the SWB Monitor and his staff; as well as being the most likely to have received the internal Western Union email “referring or relating” to such communications with the SWB Monitor and his staff. Our assessment is that the 42 custodians were not in either position,⁴ and thus they would most likely not have additional, non-duplicative responsive email to those that would be collected from the 32 custodians. By September 13, we expect to provide, for your review, additional information that we will have collected regarding these 42 custodians, that would be relevant to an assessment of the likelihood that each such employee would have documents that are truly responsive to Specification 2.

Given these circumstances, Western Union requests that the FTC agree to accept for now the production of responsive, non-duplicative documents relating only to the 32 custodians. If, following a review of the email corresponding to the 32 custodians, the FTC believes that searches of files of additional custodians would be necessary, Western Union will, of course, be prepared to discuss that with the staff.

II. Search and Limiting Terms

With respect to search terms, Western Union appreciates that the FTC has for the most part accepted our proposal to use terms referring to the SWB Monitor and his team as a core set

³ At page 2 of the August 8 letter, the FTC contends that Western Union has represented to the Court that “there were no fewer than 57 custodians whose emails would have to be searched.” In case the FTC believes that that statement could justify collecting and searching the emails of its proposed 74 custodians, a clarification is needed. Western Union determined that such 57 custodians have had some relation to the SWB Monitorship, but the statement was not meant to convey that all these individuals would definitively have responsive, non-duplicative documents, or suggest that all 57 custodians interacted with the SWB Monitor to a degree that necessarily warrants searching their files.

⁴ For example, Bob Cambron (line 39 of Att-3 to your August 8 letter), Andrea Castle (line 40) and James Middleton (line 55) are contractors who no longer work on the Southwest Border Program and are thus unlikely to have non-duplicative files. Moreover, Jean Claude Farah (line 62(e)), Jan Hillered (line 62(h)) and Drina Yue (line 62(m)), all identified by the FTC as part of Western Union’s management team, have no responsibility for the Southwest Border Program, but rather oversee responsibilities outside of the United States.

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of base terms in conjunction with a set of limiting terms. However, the FTC's August 8 proposal as to the limiting terms now includes an additional 23 terms (Att-5 to Att-6, lines 24-47). These additional terms essentially double the number contained in the FTC's July 17, 2013 letter, and yet are in essence the same terms that made up its base terms in that proposal.

The analysis conducted on the sample of the three custodians (Brandt, Porter and Farah) indicates that these search and limiting terms are ineffective in obtaining the email relevant to Specification 2 of the CID. As demonstrated in United Lex's Search Term Hit Report (attached to this letter), 657 of the terms had zero hits and 393 of the terms yielded only one file. Western Union should not have to incur the expenses associated with processing the search for such terms when this analysis proves they are useless. Thus, we again ask the FTC to withdraw some of the limiting terms, per the attached report, to reduce the volume of emails to be collected, processed, reviewed and produced.

Western Union also renews its objection to the phrase "money order" (Att-6, line 47) now listed as a limiting term in the protocol, but previously listed as a base term by the FTC. As previously indicated, the Arizona settlement does not concern money orders, and thus the SWB Monitor has no jurisdiction over Western Union's money order business. It is inappropriate to include this phrase on the list of limiting terms.

III. Other Measures to Comply with the CID

Two weeks ago, we began the process of collecting documents from the 32 custodians we believe have non-privileged documents that could be responsive to Specification 2 of the CID. Through that process, we expect to obtain information that may help to define the appropriate scope of the electronic searches. As part of that process, working with United Lex, we are also extracting the pertinent files from such custodians' hard drives.

You had mentioned that an FTC investigator out of Chicago has some matters to discuss with us regarding our prior productions. Of course, Jose and I will make ourselves available for that conversation.

IV. Timing of Production

The FTC's demand that all documents responsive to Specification 2 be produced by October 31, 2013, under the terms set forth in its August 8 search protocol, is simply unrealistic. Extracting the email just for the 32 custodians from Western Union's journaling system, will take one month (assuming no problems or processing errors). With the FTC seeking more than double that number of custodians, the extraction of their emails would likely take several months or longer. Additional time would still be required to process, deduplicate, review and then produce the responsive, non-privileged email. These measures would be necessary to satisfy the FTC's request that Western Union perform "quality control" to avoid producing a large volume

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of nonresponsive email. We assume that is still the FTC's request, although it seems not to have been contemplated in its August 8 proposal.

V. Meet and Confer

Given the information provided by United Lex regarding the huge volume of email, and its impact on the burdens and costs of complying with the CID as currently requested by the FTC, we believe it would be productive for us to meet and confer again.

In the meantime, as indicated in our August 7 letter, Western Union will continue extracting the electronic files and hard copy documents corresponding to the 32 custodians, so that it can start a rolling production of such materials to the FTC.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward B. Schwartz".

Edward B. Schwartz

Enclosures

Search Term	Count
"Greenberg"	1030
"Keene"	1046
"Lonnie"	4223
"Monitor"	19842
"Monitorship"	62
"SWB Monitor"	2613
"SWBA Monitor"	42
"Ted"	2019
"the Monitor"	7920
(Frederick R. Kessler) or (Frederick R Kessler)	1
*@WUmonitor.com	749
Dennis Lormel	380
Douglas Meadows	60
Ernest Sohn	32
JD Hannick	23
Jeff Hunter	17
John Bell	391
John De Wulf	0
John Knapp	366
Lisa Dawson	20
Lonnie Keene	742
Matt Derstine	1
Michael Ledley	1
Nick Nahas	5
Patrick Mahon	3
Paul Lewis	341
Rachele Byrne	0
Reynold Benjamin	1
Ricki Conrey	48
Robert Silbering	2
Sarah Schuyler	44
Steven Escaravage	25
Ted Greenberg	376
WUmonitor@gmail.com	112
WUmonitor2012@gmail.com	5
Wyn Clark	67
Entire Set	23537

Search Term	Count
"Greenberg" and (5 %)	0
"Greenberg" and (5 per cent)	1
"Greenberg" and (5 percent)	7
"Greenberg" and (agent oversight)	11
"Greenberg" and (Business Solutions)	88
"Greenberg" and (Custom House)	158
"Greenberg" and (five per cent)	1
"Greenberg" and (five percent)	4
"Greenberg" and (Implementation Plan)	5
"Greenberg" and (know your agent)	9
"Greenberg" and (money order)	54
"Greenberg" and (Periodic Review*)	47
"Greenberg" and (pre-paid)	70
"Greenberg" and (risk assessment*)	346
"Greenberg" and (Western Union Business Solutions)	74
"Greenberg" and (WU Business Solutions)	4
"Greenberg" and 5%	686
"Greenberg" and interdict*	366
"Greenberg" and KYA	104
"Greenberg" and MIP*	121
"Greenberg" and prepaid	141
"Greenberg" and Recommendation*	229
"Greenberg" and Travelex	114
"Greenberg" and WUBS	151
"Greenberg" w/10 ask*	3
"Greenberg" w/10 call*	19
"Greenberg" w/10 demand*	0
"Greenberg" w/10 email*	31
"Greenberg" w/10 e-mail*	0
"Greenberg" w/10 evaluat*	3
"Greenberg" w/10 plan	17
"Greenberg" w/10 propos*	16
"Greenberg" w/10 recommend*	30
"Greenberg" w/10 report*	30
"Greenberg" w/10 request*	29
"Greenberg" w/10 respon*	18
"Greenberg" w/10 review	17
"Greenberg" w/10 said	3
"Greenberg" w/10 say*	1
"Greenberg" w/10 spoke*	0
"Greenberg" w/10 state*	114
"Greenberg" w/10 talk*	1
"Greenberg" w/10 tell	0
"Greenberg" w/10 told	0
"Greenberg" w/10 writ*	15
"Greenberg" w/10 wrote	1
"Keene" and (5 %)	0
"Keene" and (5 per cent)	1
"Keene" and (5 percent)	1
"Keene" and (agent oversight)	48
"Keene" and (Business Solutions)	21
"Keene" and (Custom House)	61
"Keene" and (five per cent)	2
"Keene" and (five percent)	1
"Keene" and (Implementation Plan)	68
"Keene" and (know your agent)	49
"Keene" and (money order)	141
"Keene" and (Periodic Review*)	68
"Keene" and (pre-paid)	35
"Keene" and (risk assessment*)	359
"Keene" and (Western Union Business Solutions)	8
"Keene" and (WU Business Solutions)	5
"Keene" and 5%	582
"Keene" and interdict*	255
"Keene" and KYA	97
"Keene" and MIP*	119
"Keene" and prepaid	106

Search Term	Count
"Keene" and Recommendation*	404
"Keene" and Travelex	126
"Keene" and WUBS	27
"Keene" w/10 ask*	6
"Keene" w/10 call*	22
"Keene" w/10 demand*	0
"Keene" w/10 email*	11
"Keene" w/10 e-mail*	0
"Keene" w/10 evaluat*	3
"Keene" w/10 plan	19
"Keene" w/10 propos*	4
"Keene" w/10 recommend*	181
"Keene" w/10 report*	44
"Keene" w/10 request*	22
"Keene" w/10 respon*	21
"Keene" w/10 review	46
"Keene" w/10 said	0
"Keene" w/10 say*	2
"Keene" w/10 spoke*	0
"Keene" w/10 state*	135
"Keene" w/10 talk*	2
"Keene" w/10 tell	0
"Keene" w/10 told	0
"Keene" w/10 writ*	3
"Keene" w/10 wrote	13
"Lonnie" and (5 %)	0
"Lonnie" and (5 per cent)	1
"Lonnie" and (5 percent)	48
"Lonnie" and (agent oversight)	84
"Lonnie" and (Business Solutions)	35
"Lonnie" and (Custom House)	68
"Lonnie" and (five per cent)	2
"Lonnie" and (five percent)	26
"Lonnie" and (Implementation Plan)	199
"Lonnie" and (know your agent)	79
"Lonnie" and (money order)	208
"Lonnie" and (Periodic Review*)	119
"Lonnie" and (pre-paid)	122
"Lonnie" and (risk assessment*)	1946
"Lonnie" and (Western Union Business Solutions)	28
"Lonnie" and (WU Business Solutions)	1
"Lonnie" and 5%	1815
"Lonnie" and interdict*	696
"Lonnie" and KYA	141
"Lonnie" and MIP*	276
"Lonnie" and prepaid	282
"Lonnie" and Recommendation*	1265
"Lonnie" and Travelex	146
"Lonnie" and WUBS	177
"Lonnie" w/10 ask*	239
"Lonnie" w/10 call*	146
"Lonnie" w/10 demand*	15
"Lonnie" w/10 email*	133
"Lonnie" w/10 e-mail*	7
"Lonnie" w/10 evaluat*	24
"Lonnie" w/10 plan	228
"Lonnie" w/10 propos*	73
"Lonnie" w/10 recommend*	399
"Lonnie" w/10 report*	177
"Lonnie" w/10 request*	352
"Lonnie" w/10 respon*	173
"Lonnie" w/10 review	367
"Lonnie" w/10 said	71
"Lonnie" w/10 say*	84
"Lonnie" w/10 spoke*	50
"Lonnie" w/10 state*	259
"Lonnie" w/10 talk*	131

Search Term	Count
"Lonnie" w/10 tell	23
"Lonnie" w/10 told	15
"Lonnie" w/10 writ*	52
"Lonnie" w/10 wrote	59
"Monitor" and (5 %)	0
"Monitor" and (5 per cent)	8
"Monitor" and (5 percent)	113
"Monitor" and (agent oversight)	810
"Monitor" and (Business Solutions)	871
"Monitor" and (Custom House)	597
"Monitor" and (five per cent)	67
"Monitor" and (five percent)	140
"Monitor" and (Implementation Plan)	894
"Monitor" and (know your agent)	654
"Monitor" and (money order)	1449
"Monitor" and (Periodic Review*)	684
"Monitor" and (pre-paid)	882
"Monitor" and (risk assessment*)	6990
"Monitor" and (Western Union Business Solutions)	598
"Monitor" and (WU Business Solutions)	145
"Monitor" and 5%	11311
"Monitor" and interdict*	5214
"Monitor" and KYA	1028
"Monitor" and MIP*	896
"Monitor" and prepaid	2906
"Monitor" and Recommendation*	6430
"Monitor" and Travelex	891
"Monitor" and WUBS	1940
"Monitor" w/10 ask*	701
"Monitor" w/10 call*	1201
"Monitor" w/10 demand*	49
"Monitor" w/10 email*	438
"Monitor" w/10 e-mail*	126
"Monitor" w/10 evaluat*	754
"Monitor" w/10 plan	1372
"Monitor" w/10 propos*	1032
"Monitor" w/10 recommend*	3015
"Monitor" w/10 report*	2355
"Monitor" w/10 request*	1957
"Monitor" w/10 respon*	1247
"Monitor" w/10 review	2927
"Monitor" w/10 said	225
"Monitor" w/10 say*	130
"Monitor" w/10 spoke*	71
"Monitor" w/10 state*	2557
"Monitor" w/10 talk*	217
"Monitor" w/10 tell	47
"Monitor" w/10 told	163
"Monitor" w/10 writ*	345
"Monitor" w/10 wrote	45
"Monitorship" and (5 %)	0
"Monitorship" and (5 per cent)	1
"Monitorship" and (5 percent)	1
"Monitorship" and (agent oversight)	5
"Monitorship" and (Business Solutions)	1
"Monitorship" and (Custom House)	2
"Monitorship" and (five per cent)	1
"Monitorship" and (five percent)	4
"Monitorship" and (Implementation Plan)	4
"Monitorship" and (know your agent)	5
"Monitorship" and (money order)	7
"Monitorship" and (Periodic Review*)	11
"Monitorship" and (pre-paid)	5
"Monitorship" and (risk assessment*)	41
"Monitorship" and (Western Union Business Solutions)	1
"Monitorship" and (WU Business Solutions)	1
"Monitorship" and 5%	41

Search Term	Count
"Monitorship" and interdict*	8
"Monitorship" and KYA	8
"Monitorship" and MIP*	1
"Monitorship" and prepaid	5
"Monitorship" and Recommendation*	39
"Monitorship" and Travelex	4
"Monitorship" and WUBS	13
"Monitorship" w/10 ask*	0
"Monitorship" w/10 call*	0
"Monitorship" w/10 demand*	0
"Monitorship" w/10 email*	0
"Monitorship" w/10 e-mail*	0
"Monitorship" w/10 evaluat*	3
"Monitorship" w/10 plan	1
"Monitorship" w/10 propos*	2
"Monitorship" w/10 recommend*	2
"Monitorship" w/10 report*	10
"Monitorship" w/10 request*	3
"Monitorship" w/10 respon*	3
"Monitorship" w/10 review	2
"Monitorship" w/10 said	0
"Monitorship" w/10 say*	2
"Monitorship" w/10 spoke*	0
"Monitorship" w/10 state*	4
"Monitorship" w/10 talk*	0
"Monitorship" w/10 tell	0
"Monitorship" w/10 told	0
"Monitorship" w/10 writ*	0
"Monitorship" w/10 wrote	1
"SWB Monitor" and (5 %)	0
"SWB Monitor" and (5 per cent)	1
"SWB Monitor" and (5 percent)	5
"SWB Monitor" and (agent oversight)	84
"SWB Monitor" and (Business Solutions)	46
"SWB Monitor" and (Custom House)	79
"SWB Monitor" and (five per cent)	1
"SWB Monitor" and (five percent)	8
"SWB Monitor" and (Implementation Plan)	124
"SWB Monitor" and (know your agent)	59
"SWB Monitor" and (money order)	158
"SWB Monitor" and (Periodic Review*)	34
"SWB Monitor" and (pre-paid)	114
"SWB Monitor" and (risk assessment*)	1113
"SWB Monitor" and (Western Union Business Solutions)	38
"SWB Monitor" and (WU Business Solutions)	3
"SWB Monitor" and 5%	1368
"SWB Monitor" and interdict*	796
"SWB Monitor" and KYA	191
"SWB Monitor" and MIP*	220
"SWB Monitor" and prepaid	227
"SWB Monitor" and Recommendation*	957
"SWB Monitor" and Travelex	78
"SWB Monitor" and WUBS	264
"SWB Monitor" w/10 ask*	44
"SWB Monitor" w/10 call*	41
"SWB Monitor" w/10 demand*	0
"SWB Monitor" w/10 email*	27
"SWB Monitor" w/10 e-mail*	0
"SWB Monitor" w/10 evaluat*	0
"SWB Monitor" w/10 plan	65
"SWB Monitor" w/10 propos*	60
"SWB Monitor" w/10 recommend*	421
"SWB Monitor" w/10 report*	131
"SWB Monitor" w/10 request*	235
"SWB Monitor" w/10 respon*	73
"SWB Monitor" w/10 review	156
"SWB Monitor" w/10 said	45

Search Term	Count
"SWB Monitor" w/10 say*	0
"SWB Monitor" w/10 spoke*	3
"SWB Monitor" w/10 state*	124
"SWB Monitor" w/10 talk*	13
"SWB Monitor" w/10 tell	2
"SWB Monitor" w/10 told	0
"SWB Monitor" w/10 writ*	32
"SWB Monitor" w/10 wrote	0
"SWBA Monitor" and (5 %)	0
"SWBA Monitor" and (5 per cent)	1
"SWBA Monitor" and (5 percent)	1
"SWBA Monitor" and (agent oversight)	5
"SWBA Monitor" and (Business Solutions)	2
"SWBA Monitor" and (Custom House)	2
"SWBA Monitor" and (five per cent)	1
"SWBA Monitor" and (five percent)	1
"SWBA Monitor" and (Implementation Plan)	12
"SWBA Monitor" and (know your agent)	15
"SWBA Monitor" and (money order)	19
"SWBA Monitor" and (Periodic Review*)	9
"SWBA Monitor" and (pre-paid)	15
"SWBA Monitor" and (risk assessment*)	36
"SWBA Monitor" and (Western Union Business Solutions)	2
"SWBA Monitor" and (WU Business Solutions)	1
"SWBA Monitor" and 5%	41
"SWBA Monitor" and interdict*	20
"SWBA Monitor" and KYA	15
"SWBA Monitor" and MIP*	4
"SWBA Monitor" and prepaid	15
"SWBA Monitor" and Recommendation*	36
"SWBA Monitor" and Travelex	2
"SWBA Monitor" and WUBS	3
"SWBA Monitor" w/10 ask*	0
"SWBA Monitor" w/10 call*	0
"SWBA Monitor" w/10 demand*	0
"SWBA Monitor" w/10 email*	0
"SWBA Monitor" w/10 e-mail*	0
"SWBA Monitor" w/10 evaluat*	0
"SWBA Monitor" w/10 plan	0
"SWBA Monitor" w/10 propos*	0
"SWBA Monitor" w/10 recommend*	0
"SWBA Monitor" w/10 report*	4
"SWBA Monitor" w/10 request*	0
"SWBA Monitor" w/10 respon*	0
"SWBA Monitor" w/10 review	1
"SWBA Monitor" w/10 said	0
"SWBA Monitor" w/10 say*	0
"SWBA Monitor" w/10 spoke*	0
"SWBA Monitor" w/10 state*	0
"SWBA Monitor" w/10 talk*	0
"SWBA Monitor" w/10 tell	0
"SWBA Monitor" w/10 told	0
"SWBA Monitor" w/10 writ*	1
"SWBA Monitor" w/10 wrote	0
"Ted" and (5 %)	0
"Ted" and (5 per cent)	1
"Ted" and (5 percent)	28
"Ted" and (agent oversight)	12
"Ted" and (Business Solutions)	97
"Ted" and (Custom House)	97
"Ted" and (five per cent)	1
"Ted" and (five percent)	13
"Ted" and (Implementation Plan)	33
"Ted" and (know your agent)	33
"Ted" and (money order)	83
"Ted" and (Periodic Review*)	34
"Ted" and (pre-paid)	69

Search Term	Count
"Ted" and (risk assessment*)	565
"Ted" and (Western Union Business Solutions)	75
"Ted" and (WU Business Solutions)	10
"Ted" and 5%	1408
"Ted" and interdict*	408
"Ted" and KYA	117
"Ted" and MIP*	296
"Ted" and prepaid	267
"Ted" and Recommendation*	475
"Ted" and Travelex	282
"Ted" and WUBS	371
"Ted" w/10 ask*	103
"Ted" w/10 call*	91
"Ted" w/10 demand*	1
"Ted" w/10 email*	33
"Ted" w/10 e-mail*	10
"Ted" w/10 evaluat*	1
"Ted" w/10 plan	58
"Ted" w/10 propos*	51
"Ted" w/10 recommend*	86
"Ted" w/10 report*	80
"Ted" w/10 request*	202
"Ted" w/10 respon*	57
"Ted" w/10 review	89
"Ted" w/10 said	60
"Ted" w/10 say*	40
"Ted" w/10 spoke*	9
"Ted" w/10 state*	213
"Ted" w/10 talk*	97
"Ted" w/10 tell	1
"Ted" w/10 told	2
"Ted" w/10 writ*	25
"Ted" w/10 wrote	18
"the Monitor" and (5 %)	0
"the Monitor" and (5 per cent)	1
"the Monitor" and (5 percent)	35
"the Monitor" and (agent oversight)	393
"the Monitor" and (Business Solutions)	214
"the Monitor" and (Custom House)	195
"the Monitor" and (five per cent)	40
"the Monitor" and (five percent)	115
"the Monitor" and (Implementation Plan)	632
"the Monitor" and (know your agent)	353
"the Monitor" and (money order)	741
"the Monitor" and (Periodic Review*)	429
"the Monitor" and (pre-paid)	557
"the Monitor" and (risk assessment*)	3760
"the Monitor" and (Western Union Business Solutions)	187
"the Monitor" and (WU Business Solutions)	4
"the Monitor" and 5%	4472
"the Monitor" and interdict*	2394
"the Monitor" and KYA	586
"the Monitor" and MIP*	665
"the Monitor" and prepaid	965
"the Monitor" and Recommendation*	3601
"the Monitor" and Travelex	322
"the Monitor" and WUBS	991
"the Monitor" w/10 ask*	417
"the Monitor" w/10 call*	414
"the Monitor" w/10 demand*	23
"the Monitor" w/10 email*	113
"the Monitor" w/10 e-mail*	2
"the Monitor" w/10 evaluat*	339
"the Monitor" w/10 plan	864
"the Monitor" w/10 propos*	633
"the Monitor" w/10 recommend*	1781
"the Monitor" w/10 report*	713

Search Term	Count
"the Monitor" w/10 request*	1102
"the Monitor" w/10 respon*	486
"the Monitor" w/10 review	1534
"the Monitor" w/10 said	110
"the Monitor" w/10 say*	51
"the Monitor" w/10 spoke*	20
"the Monitor" w/10 state*	1072
"the Monitor" w/10 talk*	170
"the Monitor" w/10 tell	33
"the Monitor" w/10 told	147
"the Monitor" w/10 writ*	180
"the Monitor" w/10 wrote	39
((Frederick R. Kessler) or (Frederick R Kessler) and (5 %)	0
((Frederick R. Kessler) or (Frederick R Kessler) and (5 per cent)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (5 percent)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (agent oversight)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (Business Solutions)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (Custom House)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (five per cent)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (five percent)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (Implementation Plan)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (know your agent)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (money order)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (Periodic Review*)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (pre-paid)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (risk assessment*)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (Western Union Business Solutions)	1
((Frederick R. Kessler) or (Frederick R Kessler) and (WU Business Solutions)	1
((Frederick R. Kessler) or (Frederick R Kessler) and 5%	1
((Frederick R. Kessler) or (Frederick R Kessler) and interdict*	1
((Frederick R. Kessler) or (Frederick R Kessler) and KYA	1
((Frederick R. Kessler) or (Frederick R Kessler) and MIP*	0
((Frederick R. Kessler) or (Frederick R Kessler) and prepaid	1
((Frederick R. Kessler) or (Frederick R Kessler) and Recommendation*	1
((Frederick R. Kessler) or (Frederick R Kessler) and Travelex	1
((Frederick R. Kessler) or (Frederick R Kessler) and WUBS	1
((Frederick R. Kessler) or (Frederick R Kessler) w/10 ask*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 call*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 demand*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 email*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 e-mail*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 evaluat*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 plan	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 propos*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 recommend*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 report*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 request*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 respon*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 review	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 said	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 say*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 spoke*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 state*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 talk*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 tell	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 told	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 writ*	0
((Frederick R. Kessler) or (Frederick R Kessler) w/10 wrote	0
(*@WUmonitor com) and (5 %)	0
(*@WUmonitor com) and (5 per cent)	0
(*@WUmonitor com) and (5 percent)	2
(*@WUmonitor com) and (agent oversight)	0
(*@WUmonitor com) and (Business Solutions)	7
(*@WUmonitor com) and (Custom House)	0
(*@WUmonitor com) and (five per cent)	0
(*@WUmonitor com) and (five percent)	1
(*@WUmonitor com) and (Implementation Plan)	0

Search Term	Count
(*@WUmonitor com) and (know your agent)	7
(*@WUmonitor com) and (money order)	1
(*@WUmonitor com) and (Periodic Review*)	13
(*@WUmonitor com) and (pre-paid)	0
(*@WUmonitor com) and (risk assessment*)	213
(*@WUmonitor com) and (Western Union Business Solutions)	7
(*@WUmonitor com) and (WU Business Solutions)	0
(*@WUmonitor com) and 5%	318
(*@WUmonitor com) and interdict*	65
(*@WUmonitor com) and KYA	18
(*@WUmonitor com) and MIP*	79
(*@WUmonitor com) and prepaid	5
(*@WUmonitor com) and Recommendation*	144
(*@WUmonitor com) and Travelex	0
(*@WUmonitor com) and WUBS	73
(*@WUmonitor com) w/10 ask*	0
(*@WUmonitor com) w/10 call*	14
(*@WUmonitor com) w/10 demand*	0
(*@WUmonitor com) w/10 email*	7
(*@WUmonitor com) w/10 e-mail*	0
(*@WUmonitor com) w/10 evaluat*	0
(*@WUmonitor com) w/10 plan	3
(*@WUmonitor com) w/10 propos*	7
(*@WUmonitor com) w/10 recommend*	0
(*@WUmonitor com) w/10 report*	15
(*@WUmonitor com) w/10 request*	5
(*@WUmonitor com) w/10 respon*	47
(*@WUmonitor com) w/10 review	17
(*@WUmonitor com) w/10 said	0
(*@WUmonitor com) w/10 say*	0
(*@WUmonitor com) w/10 spoke*	0
(*@WUmonitor com) w/10 state*	2
(*@WUmonitor com) w/10 talk*	0
(*@WUmonitor com) w/10 tell	0
(*@WUmonitor com) w/10 told	0
(*@WUmonitor com) w/10 writ*	0
(*@WUmonitor com) w/10 wrote	11
(Dennis Lormel) and (5 %)	0
(Dennis Lormel) and (5 per cent)	1
(Dennis Lormel) and (5 percent)	1
(Dennis Lormel) and (agent oversight)	7
(Dennis Lormel) and (Business Solutions)	2
(Dennis Lormel) and (Custom House)	6
(Dennis Lormel) and (five per cent)	1
(Dennis Lormel) and (five percent)	1
(Dennis Lormel) and (Implementation Plan)	3
(Dennis Lormel) and (know your agent)	8
(Dennis Lormel) and (money order)	17
(Dennis Lormel) and (Periodic Review*)	3
(Dennis Lormel) and (pre-paid)	23
(Dennis Lormel) and (risk assessment*)	221
(Dennis Lormel) and (Western Union Business Solutions)	2
(Dennis Lormel) and (WU Business Solutions)	1
(Dennis Lormel) and 5%	200
(Dennis Lormel) and interdict*	145
(Dennis Lormel) and KYA	82
(Dennis Lormel) and MIP*	80
(Dennis Lormel) and prepaid	9
(Dennis Lormel) and Recommendation*	130
(Dennis Lormel) and Travelex	3
(Dennis Lormel) and WUBS	85
(Dennis Lormel) w/10 ask*	2
(Dennis Lormel) w/10 call*	3
(Dennis Lormel) w/10 demand*	0
(Dennis Lormel) w/10 email*	2
(Dennis Lormel) w/10 e-mail*	0
(Dennis Lormel) w/10 evaluat*	0

Search Term	Count
(Dennis Lormel) w/10 plan	18
(Dennis Lormel) w/10 propos*	26
(Dennis Lormel) w/10 recommend*	11
(Dennis Lormel) w/10 report*	0
(Dennis Lormel) w/10 request*	8
(Dennis Lormel) w/10 respon*	10
(Dennis Lormel) w/10 review	1
(Dennis Lormel) w/10 said	3
(Dennis Lormel) w/10 say*	1
(Dennis Lormel) w/10 spoke*	0
(Dennis Lormel) w/10 state*	10
(Dennis Lormel) w/10 talk*	0
(Dennis Lormel) w/10 tell	0
(Dennis Lormel) w/10 told	0
(Dennis Lormel) w/10 writ*	1
(Dennis Lormel) w/10 wrote	0
(Douglas Meadows) and (5 %)	0
(Douglas Meadows) and (5 per cent)	1
(Douglas Meadows) and (5 percent)	1
(Douglas Meadows) and (agent oversight)	1
(Douglas Meadows) and (Business Solutions)	1
(Douglas Meadows) and (Custom House)	1
(Douglas Meadows) and (five per cent)	1
(Douglas Meadows) and (five percent)	1
(Douglas Meadows) and (Implementation Plan)	1
(Douglas Meadows) and (know your agent)	1
(Douglas Meadows) and (money order)	2
(Douglas Meadows) and (Periodic Review*)	2
(Douglas Meadows) and (pre-paid)	1
(Douglas Meadows) and (risk assessment*)	35
(Douglas Meadows) and (Western Union Business Solutions)	1
(Douglas Meadows) and (WU Business Solutions)	1
(Douglas Meadows) and 5%	37
(Douglas Meadows) and interdict*	16
(Douglas Meadows) and KYA	1
(Douglas Meadows) and MIP*	15
(Douglas Meadows) and prepaid	1
(Douglas Meadows) and Recommendation*	10
(Douglas Meadows) and Travelex	1
(Douglas Meadows) and WUBS	3
(Douglas Meadows) w/10 ask*	0
(Douglas Meadows) w/10 call*	3
(Douglas Meadows) w/10 demand*	0
(Douglas Meadows) w/10 email*	1
(Douglas Meadows) w/10 e-mail*	0
(Douglas Meadows) w/10 evaluat*	0
(Douglas Meadows) w/10 plan	0
(Douglas Meadows) w/10 propos*	0
(Douglas Meadows) w/10 recommend*	8
(Douglas Meadows) w/10 report*	0
(Douglas Meadows) w/10 request*	2
(Douglas Meadows) w/10 respon*	0
(Douglas Meadows) w/10 review	0
(Douglas Meadows) w/10 said	0
(Douglas Meadows) w/10 say*	0
(Douglas Meadows) w/10 spoke*	0
(Douglas Meadows) w/10 state*	0
(Douglas Meadows) w/10 talk*	0
(Douglas Meadows) w/10 tell	0
(Douglas Meadows) w/10 told	0
(Douglas Meadows) w/10 writ*	0
(Douglas Meadows) w/10 wrote	0
(Ernest Sohn) and (5 %)	0
(Ernest Sohn) and (5 per cent)	1
(Ernest Sohn) and (5 percent)	1
(Ernest Sohn) and (agent oversight)	1
(Ernest Sohn) and (Business Solutions)	1

Search Term	Count
(Ernest Sohn) and (Custom House)	1
(Ernest Sohn) and (five per cent)	1
(Ernest Sohn) and (five percent)	1
(Ernest Sohn) and (Implementation Plan)	1
(Ernest Sohn) and (know your agent)	1
(Ernest Sohn) and (money order)	1
(Ernest Sohn) and (Periodic Review*)	1
(Ernest Sohn) and (pre-paid)	1
(Ernest Sohn) and (risk assessment*)	18
(Ernest Sohn) and (Western Union Business Solutions)	1
(Ernest Sohn) and (WU Business Solutions)	1
(Ernest Sohn) and 5%	29
(Ernest Sohn) and interdict*	9
(Ernest Sohn) and KYA	1
(Ernest Sohn) and MIP*	7
(Ernest Sohn) and prepaid	1
(Ernest Sohn) and Recommendation*	1
(Ernest Sohn) and Travelex	1
(Ernest Sohn) and WUBS	1
(Ernest Sohn) w/10 ask*	0
(Ernest Sohn) w/10 call*	0
(Ernest Sohn) w/10 demand*	0
(Ernest Sohn) w/10 email*	0
(Ernest Sohn) w/10 e-mail*	0
(Ernest Sohn) w/10 evaluat*	0
(Ernest Sohn) w/10 plan	0
(Ernest Sohn) w/10 propos*	0
(Ernest Sohn) w/10 recommend*	0
(Ernest Sohn) w/10 report*	0
(Ernest Sohn) w/10 request*	0
(Ernest Sohn) w/10 respon*	0
(Ernest Sohn) w/10 review	0
(Ernest Sohn) w/10 said	0
(Ernest Sohn) w/10 say*	0
(Ernest Sohn) w/10 spoke*	0
(Ernest Sohn) w/10 state*	0
(Ernest Sohn) w/10 talk*	0
(Ernest Sohn) w/10 tell	0
(Ernest Sohn) w/10 told	0
(Ernest Sohn) w/10 writ*	0
(Ernest Sohn) w/10 wrote	0
(JD Hannick) and (5 %)	0
(JD Hannick) and (5 per cent)	1
(JD Hannick) and (5 percent)	1
(JD Hannick) and (agent oversight)	1
(JD Hannick) and (Business Solutions)	1
(JD Hannick) and (Custom House)	1
(JD Hannick) and (five per cent)	1
(JD Hannick) and (five percent)	1
(JD Hannick) and (Implementation Plan)	1
(JD Hannick) and (know your agent)	1
(JD Hannick) and (money order)	1
(JD Hannick) and (Periodic Review*)	1
(JD Hannick) and (pre-paid)	1
(JD Hannick) and (risk assessment*)	10
(JD Hannick) and (Western Union Business Solutions)	1
(JD Hannick) and (WU Business Solutions)	1
(JD Hannick) and 5%	21
(JD Hannick) and interdict*	1
(JD Hannick) and KYA	1
(JD Hannick) and MIP*	1
(JD Hannick) and prepaid	1
(JD Hannick) and Recommendation*	1
(JD Hannick) and Travelex	1
(JD Hannick) and WUBS	1
(JD Hannick) w/10 ask*	0
(JD Hannick) w/10 call*	0

Search Term	Count
(JD Hannick) w/10 demand*	0
(JD Hannick) w/10 email*	0
(JD Hannick) w/10 e-mail*	0
(JD Hannick) w/10 evaluat*	0
(JD Hannick) w/10 plan	0
(JD Hannick) w/10 propos*	0
(JD Hannick) w/10 recommend*	0
(JD Hannick) w/10 report*	0
(JD Hannick) w/10 request*	0
(JD Hannick) w/10 respon*	0
(JD Hannick) w/10 review	0
(JD Hannick) w/10 said	0
(JD Hannick) w/10 say*	0
(JD Hannick) w/10 spoke*	0
(JD Hannick) w/10 state*	0
(JD Hannick) w/10 talk*	0
(JD Hannick) w/10 tell	0
(JD Hannick) w/10 told	0
(JD Hannick) w/10 writ*	0
(JD Hannick) w/10 wrote	0
(Jeff Hunter) and (5 %)	0
(Jeff Hunter) and (5 per cent)	1
(Jeff Hunter) and (5 percent)	1
(Jeff Hunter) and (agent oversight)	1
(Jeff Hunter) and (Business Solutions)	3
(Jeff Hunter) and (Custom House)	1
(Jeff Hunter) and (five per cent)	1
(Jeff Hunter) and (five percent)	1
(Jeff Hunter) and (Implementation Plan)	1
(Jeff Hunter) and (know your agent)	1
(Jeff Hunter) and (money order)	1
(Jeff Hunter) and (Periodic Review*)	1
(Jeff Hunter) and (pre-paid)	3
(Jeff Hunter) and (risk assessment*)	2
(Jeff Hunter) and (Western Union Business Solutions)	3
(Jeff Hunter) and (WU Business Solutions)	1
(Jeff Hunter) and 5%	15
(Jeff Hunter) and interdict*	1
(Jeff Hunter) and KYA	1
(Jeff Hunter) and MIP*	10
(Jeff Hunter) and prepaid	1
(Jeff Hunter) and Recommendation*	1
(Jeff Hunter) and Travelex	10
(Jeff Hunter) and WUBS	1
(Jeff Hunter) w/10 ask*	0
(Jeff Hunter) w/10 call*	0
(Jeff Hunter) w/10 demand*	0
(Jeff Hunter) w/10 email*	0
(Jeff Hunter) w/10 e-mail*	0
(Jeff Hunter) w/10 evaluat*	0
(Jeff Hunter) w/10 plan	0
(Jeff Hunter) w/10 propos*	0
(Jeff Hunter) w/10 recommend*	0
(Jeff Hunter) w/10 report*	0
(Jeff Hunter) w/10 request*	0
(Jeff Hunter) w/10 respon*	0
(Jeff Hunter) w/10 review	0
(Jeff Hunter) w/10 said	0
(Jeff Hunter) w/10 say*	0
(Jeff Hunter) w/10 spoke*	0
(Jeff Hunter) w/10 state*	0
(Jeff Hunter) w/10 talk*	0
(Jeff Hunter) w/10 tell	0
(Jeff Hunter) w/10 told	0
(Jeff Hunter) w/10 writ*	0
(Jeff Hunter) w/10 wrote	0
(John Bell) and (5 %)	0

Search Term	Count
(John Bell) and (5 per cent)	1
(John Bell) and (5 percent)	1
(John Bell) and (agent oversight)	4
(John Bell) and (Business Solutions)	4
(John Bell) and (Custom House)	3
(John Bell) and (five per cent)	1
(John Bell) and (five percent)	2
(John Bell) and (Implementation Plan)	1
(John Bell) and (know your agent)	1
(John Bell) and (money order)	4
(John Bell) and (Periodic Review*)	1
(John Bell) and (pre-paid)	25
(John Bell) and (risk assessment*)	140
(John Bell) and (Western Union Business Solutions)	4
(John Bell) and (WU Business Solutions)	1
(John Bell) and 5%	273
(John Bell) and interdict*	143
(John Bell) and KYA	64
(John Bell) and MIP*	86
(John Bell) and prepaid	38
(John Bell) and Recommendation*	118
(John Bell) and Travelex	40
(John Bell) and WUBS	109
(John Bell) w/10 ask*	5
(John Bell) w/10 call*	17
(John Bell) w/10 demand*	0
(John Bell) w/10 email*	2
(John Bell) w/10 e-mail*	0
(John Bell) w/10 evaluat*	0
(John Bell) w/10 plan	1
(John Bell) w/10 propos*	0
(John Bell) w/10 recommend*	8
(John Bell) w/10 report*	0
(John Bell) w/10 request*	4
(John Bell) w/10 respon*	4
(John Bell) w/10 review	21
(John Bell) w/10 said	0
(John Bell) w/10 say*	0
(John Bell) w/10 spoke*	0
(John Bell) w/10 state*	63
(John Bell) w/10 talk*	10
(John Bell) w/10 tell	0
(John Bell) w/10 told	0
(John Bell) w/10 writ*	0
(John Bell) w/10 wrote	0
(John De Wulf) and (5 %)	0
(John De Wulf) and (5 per cent)	0
(John De Wulf) and (5 percent)	0
(John De Wulf) and (agent oversight)	0
(John De Wulf) and (Business Solutions)	0
(John De Wulf) and (Custom House)	0
(John De Wulf) and (five per cent)	0
(John De Wulf) and (five percent)	0
(John De Wulf) and (Implementation Plan)	0
(John De Wulf) and (know your agent)	0
(John De Wulf) and (money order)	0
(John De Wulf) and (Periodic Review*)	0
(John De Wulf) and (pre-paid)	0
(John De Wulf) and (risk assessment*)	0
(John De Wulf) and (Western Union Business Solutions)	0
(John De Wulf) and (WU Business Solutions)	0
(John De Wulf) and 5%	0
(John De Wulf) and interdict*	0
(John De Wulf) and KYA	0
(John De Wulf) and MIP*	0
(John De Wulf) and prepaid	0
(John De Wulf) and Recommendation*	0

Search Term	Count
(John De Wulf) and Travelex	0
(John De Wulf) and WUBS	0
(John De Wulf) w/10 ask*	0
(John De Wulf) w/10 call*	0
(John De Wulf) w/10 demand*	0
(John De Wulf) w/10 email*	0
(John De Wulf) w/10 e-mail*	0
(John De Wulf) w/10 evaluat*	0
(John De Wulf) w/10 plan	0
(John De Wulf) w/10 propos*	0
(John De Wulf) w/10 recommend*	0
(John De Wulf) w/10 report*	0
(John De Wulf) w/10 request*	0
(John De Wulf) w/10 respon*	0
(John De Wulf) w/10 review	0
(John De Wulf) w/10 said	0
(John De Wulf) w/10 say*	0
(John De Wulf) w/10 spoke*	0
(John De Wulf) w/10 state*	0
(John De Wulf) w/10 talk*	0
(John De Wulf) w/10 tell	0
(John De Wulf) w/10 told	0
(John De Wulf) w/10 writ*	0
(John De Wulf) w/10 wrote	0
(John Knapp) and (5 %)	0
(John Knapp) and (5 per cent)	1
(John Knapp) and (5 percent)	5
(John Knapp) and (agent oversight)	62
(John Knapp) and (Business Solutions)	1
(John Knapp) and (Custom House)	4
(John Knapp) and (five per cent)	1
(John Knapp) and (five percent)	1
(John Knapp) and (Implementation Plan)	67
(John Knapp) and (know your agent)	62
(John Knapp) and (money order)	94
(John Knapp) and (Periodic Review*)	50
(John Knapp) and (pre-paid)	85
(John Knapp) and (risk assessment*)	196
(John Knapp) and (Western Union Business Solutions)	1
(John Knapp) and (WU Business Solutions)	1
(John Knapp) and 5%	263
(John Knapp) and interdict*	173
(John Knapp) and KYA	128
(John Knapp) and MIP*	138
(John Knapp) and prepaid	70
(John Knapp) and Recommendation*	134
(John Knapp) and Travelex	7
(John Knapp) and WUBS	120
(John Knapp) w/10 ask*	9
(John Knapp) w/10 call*	14
(John Knapp) w/10 demand*	0
(John Knapp) w/10 email*	4
(John Knapp) w/10 e-mail*	0
(John Knapp) w/10 evaluat*	0
(John Knapp) w/10 plan	7
(John Knapp) w/10 propos*	19
(John Knapp) w/10 recommend*	19
(John Knapp) w/10 report*	51
(John Knapp) w/10 request*	18
(John Knapp) w/10 respon*	3
(John Knapp) w/10 review	38
(John Knapp) w/10 said	0
(John Knapp) w/10 say*	0
(John Knapp) w/10 spoke*	1
(John Knapp) w/10 state*	4
(John Knapp) w/10 talk*	0
(John Knapp) w/10 tell	3

Search Term	Count
(John Knapp) w/10 told	0
(John Knapp) w/10 writ*	0
(John Knapp) w/10 wrote	0
(Lisa Dawson) and (5 %)	0
(Lisa Dawson) and (5 per cent)	1
(Lisa Dawson) and (5 percent)	1
(Lisa Dawson) and (agent oversight)	4
(Lisa Dawson) and (Business Solutions)	1
(Lisa Dawson) and (Custom House)	1
(Lisa Dawson) and (five per cent)	1
(Lisa Dawson) and (five percent)	1
(Lisa Dawson) and (Implementation Plan)	2
(Lisa Dawson) and (know your agent)	1
(Lisa Dawson) and (money order)	1
(Lisa Dawson) and (Periodic Review*)	1
(Lisa Dawson) and (pre-paid)	1
(Lisa Dawson) and (risk assessment*)	9
(Lisa Dawson) and (Western Union Business Solutions)	1
(Lisa Dawson) and (WU Business Solutions)	1
(Lisa Dawson) and 5%	14
(Lisa Dawson) and interdict*	4
(Lisa Dawson) and KYA	1
(Lisa Dawson) and MIP*	0
(Lisa Dawson) and prepaid	5
(Lisa Dawson) and Recommendation*	5
(Lisa Dawson) and Travelex	1
(Lisa Dawson) and WUBS	1
(Lisa Dawson) w/10 ask*	0
(Lisa Dawson) w/10 call*	0
(Lisa Dawson) w/10 demand*	0
(Lisa Dawson) w/10 email*	0
(Lisa Dawson) w/10 e-mail*	0
(Lisa Dawson) w/10 evaluat*	0
(Lisa Dawson) w/10 plan	0
(Lisa Dawson) w/10 propos*	0
(Lisa Dawson) w/10 recommend*	1
(Lisa Dawson) w/10 report*	0
(Lisa Dawson) w/10 request*	1
(Lisa Dawson) w/10 respon*	0
(Lisa Dawson) w/10 review	3
(Lisa Dawson) w/10 said	0
(Lisa Dawson) w/10 say*	0
(Lisa Dawson) w/10 spoke*	0
(Lisa Dawson) w/10 state*	0
(Lisa Dawson) w/10 talk*	0
(Lisa Dawson) w/10 tell	0
(Lisa Dawson) w/10 told	0
(Lisa Dawson) w/10 writ*	0
(Lisa Dawson) w/10 wrote	0
(Lonnie Keene) and (5 %)	0
(Lonnie Keene) and (5 per cent)	1
(Lonnie Keene) and (5 percent)	1
(Lonnie Keene) and (agent oversight)	30
(Lonnie Keene) and (Business Solutions)	9
(Lonnie Keene) and (Custom House)	4
(Lonnie Keene) and (five per cent)	2
(Lonnie Keene) and (five percent)	1
(Lonnie Keene) and (Implementation Plan)	42
(Lonnie Keene) and (know your agent)	25
(Lonnie Keene) and (money order)	76
(Lonnie Keene) and (Periodic Review*)	43
(Lonnie Keene) and (pre-paid)	8
(Lonnie Keene) and (risk assessment*)	317
(Lonnie Keene) and (Western Union Business Solutions)	2
(Lonnie Keene) and (WU Business Solutions)	1
(Lonnie Keene) and 5%	325
(Lonnie Keene) and interdict*	156

Search Term	Count
(Lonnie Keene) and KYA	65
(Lonnie Keene) and MIP*	90
(Lonnie Keene) and prepaid	21
(Lonnie Keene) and Recommendation*	362
(Lonnie Keene) and Travelex	4
(Lonnie Keene) and WUBS	21
(Lonnie Keene) w/10 ask*	5
(Lonnie Keene) w/10 call*	4
(Lonnie Keene) w/10 demand*	0
(Lonnie Keene) w/10 email*	7
(Lonnie Keene) w/10 e-mail*	0
(Lonnie Keene) w/10 evaluat*	1
(Lonnie Keene) w/10 plan	11
(Lonnie Keene) w/10 propos*	2
(Lonnie Keene) w/10 recommend*	179
(Lonnie Keene) w/10 report*	26
(Lonnie Keene) w/10 request*	18
(Lonnie Keene) w/10 respon*	18
(Lonnie Keene) w/10 review	22
(Lonnie Keene) w/10 said	0
(Lonnie Keene) w/10 say*	0
(Lonnie Keene) w/10 spoke*	0
(Lonnie Keene) w/10 state*	5
(Lonnie Keene) w/10 talk*	0
(Lonnie Keene) w/10 tell	0
(Lonnie Keene) w/10 told	0
(Lonnie Keene) w/10 writ*	1
(Lonnie Keene) w/10 wrote	10
(Matt Derstine) and (5 %)	0
(Matt Derstine) and (5 per cent)	1
(Matt Derstine) and (5 percent)	1
(Matt Derstine) and (agent oversight)	1
(Matt Derstine) and (Business Solutions)	1
(Matt Derstine) and (Custom House)	1
(Matt Derstine) and (five per cent)	1
(Matt Derstine) and (five percent)	1
(Matt Derstine) and (Implementation Plan)	1
(Matt Derstine) and (know your agent)	1
(Matt Derstine) and (money order)	1
(Matt Derstine) and (Periodic Review*)	1
(Matt Derstine) and (pre-paid)	1
(Matt Derstine) and (risk assessment*)	1
(Matt Derstine) and (Western Union Business Solutions)	1
(Matt Derstine) and (WU Business Solutions)	1
(Matt Derstine) and 5%	1
(Matt Derstine) and interdict*	1
(Matt Derstine) and KYA	1
(Matt Derstine) and MIP*	0
(Matt Derstine) and prepaid	1
(Matt Derstine) and Recommendation*	1
(Matt Derstine) and Travelex	1
(Matt Derstine) and WUBS	1
(Matt Derstine) w/10 ask*	0
(Matt Derstine) w/10 call*	0
(Matt Derstine) w/10 demand*	0
(Matt Derstine) w/10 email*	0
(Matt Derstine) w/10 e-mail*	0
(Matt Derstine) w/10 evaluat*	0
(Matt Derstine) w/10 plan	0
(Matt Derstine) w/10 propos*	0
(Matt Derstine) w/10 recommend*	0
(Matt Derstine) w/10 report*	0
(Matt Derstine) w/10 request*	0
(Matt Derstine) w/10 respon*	0
(Matt Derstine) w/10 review	0
(Matt Derstine) w/10 said	0
(Matt Derstine) w/10 say*	0

Search Term	Count
(Matt Derstine) w/10 spoke*	0
(Matt Derstine) w/10 state*	0
(Matt Derstine) w/10 talk*	0
(Matt Derstine) w/10 tell	0
(Matt Derstine) w/10 told	0
(Matt Derstine) w/10 writ*	0
(Matt Derstine) w/10 wrote	0
(Michael Ledley) and (5 %)	0
(Michael Ledley) and (5 per cent)	1
(Michael Ledley) and (5 percent)	1
(Michael Ledley) and (agent oversight)	1
(Michael Ledley) and (Business Solutions)	1
(Michael Ledley) and (Custom House)	1
(Michael Ledley) and (five per cent)	1
(Michael Ledley) and (five percent)	1
(Michael Ledley) and (Implementation Plan)	1
(Michael Ledley) and (know your agent)	1
(Michael Ledley) and (money order)	1
(Michael Ledley) and (Periodic Review*)	1
(Michael Ledley) and (pre-paid)	1
(Michael Ledley) and (risk assessment*)	1
(Michael Ledley) and (Western Union Business Solutions)	1
(Michael Ledley) and (WU Business Solutions)	1
(Michael Ledley) and 5%	1
(Michael Ledley) and interdict*	1
(Michael Ledley) and KYA	1
(Michael Ledley) and MIP*	0
(Michael Ledley) and prepaid	1
(Michael Ledley) and Recommendation*	1
(Michael Ledley) and Travelex	1
(Michael Ledley) and WUBS	1
(Michael Ledley) w/10 ask*	0
(Michael Ledley) w/10 call*	0
(Michael Ledley) w/10 demand*	0
(Michael Ledley) w/10 email*	0
(Michael Ledley) w/10 e-mail*	0
(Michael Ledley) w/10 evaluat*	0
(Michael Ledley) w/10 plan	0
(Michael Ledley) w/10 propos*	0
(Michael Ledley) w/10 recommend*	0
(Michael Ledley) w/10 report*	0
(Michael Ledley) w/10 request*	0
(Michael Ledley) w/10 respon*	0
(Michael Ledley) w/10 review	0
(Michael Ledley) w/10 said	0
(Michael Ledley) w/10 say*	0
(Michael Ledley) w/10 spoke*	0
(Michael Ledley) w/10 state*	0
(Michael Ledley) w/10 talk*	0
(Michael Ledley) w/10 tell	0
(Michael Ledley) w/10 told	0
(Michael Ledley) w/10 writ*	0
(Michael Ledley) w/10 wrote	0
(Nick Nahas) and (5 %)	0
(Nick Nahas) and (5 per cent)	1
(Nick Nahas) and (5 percent)	1
(Nick Nahas) and (agent oversight)	1
(Nick Nahas) and (Business Solutions)	1
(Nick Nahas) and (Custom House)	1
(Nick Nahas) and (five per cent)	1
(Nick Nahas) and (five percent)	1
(Nick Nahas) and (Implementation Plan)	1
(Nick Nahas) and (know your agent)	1
(Nick Nahas) and (money order)	1
(Nick Nahas) and (Periodic Review*)	1
(Nick Nahas) and (pre-paid)	1
(Nick Nahas) and (risk assessment*)	1

Search Term	Count
(Nick Nahas) and (Western Union Business Solutions)	1
(Nick Nahas) and (WU Business Solutions)	1
(Nick Nahas) and 5%	5
(Nick Nahas) and interdict*	1
(Nick Nahas) and KYA	1
(Nick Nahas) and MIP*	0
(Nick Nahas) and prepaid	1
(Nick Nahas) and Recommendation*	1
(Nick Nahas) and Travelex	1
(Nick Nahas) and WUBS	1
(Nick Nahas) w/10 ask*	0
(Nick Nahas) w/10 call*	0
(Nick Nahas) w/10 demand*	0
(Nick Nahas) w/10 email*	0
(Nick Nahas) w/10 e-mail*	0
(Nick Nahas) w/10 evaluat*	0
(Nick Nahas) w/10 plan	0
(Nick Nahas) w/10 propos*	0
(Nick Nahas) w/10 recommend*	0
(Nick Nahas) w/10 report*	0
(Nick Nahas) w/10 request*	0
(Nick Nahas) w/10 respon*	0
(Nick Nahas) w/10 review	0
(Nick Nahas) w/10 said	0
(Nick Nahas) w/10 say*	0
(Nick Nahas) w/10 spoke*	0
(Nick Nahas) w/10 state*	0
(Nick Nahas) w/10 talk*	0
(Nick Nahas) w/10 tell	0
(Nick Nahas) w/10 told	0
(Nick Nahas) w/10 writ*	0
(Nick Nahas) w/10 wrote	0
(Patrick Mahon) and (5 %)	0
(Patrick Mahon) and (5 per cent)	1
(Patrick Mahon) and (5 percent)	1
(Patrick Mahon) and (agent oversight)	1
(Patrick Mahon) and (Business Solutions)	1
(Patrick Mahon) and (Custom House)	2
(Patrick Mahon) and (five per cent)	1
(Patrick Mahon) and (five percent)	1
(Patrick Mahon) and (Implementation Plan)	1
(Patrick Mahon) and (know your agent)	1
(Patrick Mahon) and (money order)	1
(Patrick Mahon) and (Periodic Review*)	1
(Patrick Mahon) and (pre-paid)	1
(Patrick Mahon) and (risk assessment*)	2
(Patrick Mahon) and (Western Union Business Solutions)	1
(Patrick Mahon) and (WU Business Solutions)	1
(Patrick Mahon) and 5%	3
(Patrick Mahon) and interdict*	2
(Patrick Mahon) and KYA	1
(Patrick Mahon) and MIP*	0
(Patrick Mahon) and prepaid	1
(Patrick Mahon) and Recommendation*	1
(Patrick Mahon) and Travelex	2
(Patrick Mahon) and WUBS	1
(Patrick Mahon) w/10 ask*	0
(Patrick Mahon) w/10 call*	1
(Patrick Mahon) w/10 demand*	0
(Patrick Mahon) w/10 email*	0
(Patrick Mahon) w/10 e-mail*	0
(Patrick Mahon) w/10 evaluat*	0
(Patrick Mahon) w/10 plan	0
(Patrick Mahon) w/10 propos*	0
(Patrick Mahon) w/10 recommend*	0
(Patrick Mahon) w/10 report*	0
(Patrick Mahon) w/10 request*	0

Search Term	Count
(Patrick Mahon) w/10 respon*	0
(Patrick Mahon) w/10 review	0
(Patrick Mahon) w/10 said	0
(Patrick Mahon) w/10 say*	0
(Patrick Mahon) w/10 spoke*	0
(Patrick Mahon) w/10 state*	1
(Patrick Mahon) w/10 talk*	0
(Patrick Mahon) w/10 tell	0
(Patrick Mahon) w/10 told	0
(Patrick Mahon) w/10 writ*	0
(Patrick Mahon) w/10 wrote	0
(Paul Lewis) and (5 %)	0
(Paul Lewis) and (5 per cent)	1
(Paul Lewis) and (5 percent)	1
(Paul Lewis) and (agent oversight)	6
(Paul Lewis) and (Business Solutions)	2
(Paul Lewis) and (Custom House)	8
(Paul Lewis) and (five per cent)	1
(Paul Lewis) and (five percent)	1
(Paul Lewis) and (Implementation Plan)	13
(Paul Lewis) and (know your agent)	1
(Paul Lewis) and (money order)	9
(Paul Lewis) and (Periodic Review*)	1
(Paul Lewis) and (pre-paid)	25
(Paul Lewis) and (risk assessment*)	108
(Paul Lewis) and (Western Union Business Solutions)	2
(Paul Lewis) and (WU Business Solutions)	1
(Paul Lewis) and 5%	199
(Paul Lewis) and interdict*	127
(Paul Lewis) and KYA	72
(Paul Lewis) and MIP*	63
(Paul Lewis) and prepaid	12
(Paul Lewis) and Recommendation*	113
(Paul Lewis) and Travelex	33
(Paul Lewis) and WUBS	83
(Paul Lewis) w/10 ask*	0
(Paul Lewis) w/10 call*	14
(Paul Lewis) w/10 demand*	0
(Paul Lewis) w/10 email*	7
(Paul Lewis) w/10 e-mail*	0
(Paul Lewis) w/10 evaluat*	0
(Paul Lewis) w/10 plan	0
(Paul Lewis) w/10 propos*	0
(Paul Lewis) w/10 recommend*	12
(Paul Lewis) w/10 report*	1
(Paul Lewis) w/10 request*	9
(Paul Lewis) w/10 respon*	3
(Paul Lewis) w/10 review	2
(Paul Lewis) w/10 said	0
(Paul Lewis) w/10 say*	0
(Paul Lewis) w/10 spoke*	0
(Paul Lewis) w/10 state*	38
(Paul Lewis) w/10 talk*	0
(Paul Lewis) w/10 tell	0
(Paul Lewis) w/10 told	0
(Paul Lewis) w/10 writ*	0
(Paul Lewis) w/10 wrote	0
(Rachele Byrne) and (5 %)	0
(Rachele Byrne) and (5 per cent)	0
(Rachele Byrne) and (5 percent)	0
(Rachele Byrne) and (agent oversight)	0
(Rachele Byrne) and (Business Solutions)	0
(Rachele Byrne) and (Custom House)	0
(Rachele Byrne) and (five per cent)	0
(Rachele Byrne) and (five percent)	0
(Rachele Byrne) and (Implementation Plan)	0
(Rachele Byrne) and (know your agent)	0

Search Term	Count
(Rachele Byrne) and (money order)	0
(Rachele Byrne) and (Periodic Review*)	0
(Rachele Byrne) and (pre-paid)	0
(Rachele Byrne) and (risk assessment*)	0
(Rachele Byrne) and (Western Union Business Solutions)	0
(Rachele Byrne) and (WU Business Solutions)	0
(Rachele Byrne) and 5%	0
(Rachele Byrne) and interdict*	0
(Rachele Byrne) and KYA	0
(Rachele Byrne) and MIP*	0
(Rachele Byrne) and prepaid	0
(Rachele Byrne) and Recommendation*	0
(Rachele Byrne) and Travelex	0
(Rachele Byrne) and WUBS	0
(Rachele Byrne) w/10 ask*	0
(Rachele Byrne) w/10 call*	0
(Rachele Byrne) w/10 demand*	0
(Rachele Byrne) w/10 email*	0
(Rachele Byrne) w/10 e-mail*	0
(Rachele Byrne) w/10 evaluat*	0
(Rachele Byrne) w/10 plan	0
(Rachele Byrne) w/10 propos*	0
(Rachele Byrne) w/10 recommend*	0
(Rachele Byrne) w/10 report*	0
(Rachele Byrne) w/10 request*	0
(Rachele Byrne) w/10 respon*	0
(Rachele Byrne) w/10 review	0
(Rachele Byrne) w/10 said	0
(Rachele Byrne) w/10 say*	0
(Rachele Byrne) w/10 spoke*	0
(Rachele Byrne) w/10 state*	0
(Rachele Byrne) w/10 talk*	0
(Rachele Byrne) w/10 tell	0
(Rachele Byrne) w/10 told	0
(Rachele Byrne) w/10 writ*	0
(Rachele Byrne) w/10 wrote	0
(Reynold Benjamin) and (5 %)	0
(Reynold Benjamin) and (5 per cent)	1
(Reynold Benjamin) and (5 percent)	1
(Reynold Benjamin) and (agent oversight)	1
(Reynold Benjamin) and (Business Solutions)	1
(Reynold Benjamin) and (Custom House)	1
(Reynold Benjamin) and (five per cent)	1
(Reynold Benjamin) and (five percent)	1
(Reynold Benjamin) and (Implementation Plan)	1
(Reynold Benjamin) and (know your agent)	1
(Reynold Benjamin) and (money order)	1
(Reynold Benjamin) and (Periodic Review*)	1
(Reynold Benjamin) and (pre-paid)	1
(Reynold Benjamin) and (risk assessment*)	1
(Reynold Benjamin) and (Western Union Business Solutions)	1
(Reynold Benjamin) and (WU Business Solutions)	1
(Reynold Benjamin) and 5%	1
(Reynold Benjamin) and interdict*	1
(Reynold Benjamin) and KYA	1
(Reynold Benjamin) and MIP*	0
(Reynold Benjamin) and prepaid	1
(Reynold Benjamin) and Recommendation*	1
(Reynold Benjamin) and Travelex	1
(Reynold Benjamin) and WUBS	1
(Reynold Benjamin) w/10 ask*	0
(Reynold Benjamin) w/10 call*	0
(Reynold Benjamin) w/10 demand*	0
(Reynold Benjamin) w/10 email*	0
(Reynold Benjamin) w/10 e-mail*	0
(Reynold Benjamin) w/10 evaluat*	0
(Reynold Benjamin) w/10 plan	0

Search Term	Count
(Reynold Benjamin) w/10 propos*	0
(Reynold Benjamin) w/10 recommend*	0
(Reynold Benjamin) w/10 report*	0
(Reynold Benjamin) w/10 request*	0
(Reynold Benjamin) w/10 respon*	0
(Reynold Benjamin) w/10 review	0
(Reynold Benjamin) w/10 said	0
(Reynold Benjamin) w/10 say*	0
(Reynold Benjamin) w/10 spoke*	0
(Reynold Benjamin) w/10 state*	0
(Reynold Benjamin) w/10 talk*	0
(Reynold Benjamin) w/10 tell	0
(Reynold Benjamin) w/10 told	0
(Reynold Benjamin) w/10 writ*	0
(Reynold Benjamin) w/10 wrote	0
(Ricki Conrey) and (5 %)	0
(Ricki Conrey) and (5 per cent)	1
(Ricki Conrey) and (5 percent)	1
(Ricki Conrey) and (agent oversight)	1
(Ricki Conrey) and (Business Solutions)	1
(Ricki Conrey) and (Custom House)	1
(Ricki Conrey) and (five per cent)	1
(Ricki Conrey) and (five percent)	1
(Ricki Conrey) and (Implementation Plan)	1
(Ricki Conrey) and (know your agent)	1
(Ricki Conrey) and (money order)	1
(Ricki Conrey) and (Periodic Review*)	1
(Ricki Conrey) and (pre-paid)	1
(Ricki Conrey) and (risk assessment*)	33
(Ricki Conrey) and (Western Union Business Solutions)	1
(Ricki Conrey) and (WU Business Solutions)	1
(Ricki Conrey) and 5%	46
(Ricki Conrey) and interdict*	24
(Ricki Conrey) and KYA	1
(Ricki Conrey) and MIP*	22
(Ricki Conrey) and prepaid	1
(Ricki Conrey) and Recommendation*	1
(Ricki Conrey) and Travelex	1
(Ricki Conrey) and WUBS	3
(Ricki Conrey) w/10 ask*	0
(Ricki Conrey) w/10 call*	0
(Ricki Conrey) w/10 demand*	0
(Ricki Conrey) w/10 email*	0
(Ricki Conrey) w/10 e-mail*	0
(Ricki Conrey) w/10 evaluat*	0
(Ricki Conrey) w/10 plan	0
(Ricki Conrey) w/10 propos*	0
(Ricki Conrey) w/10 recommend*	0
(Ricki Conrey) w/10 report*	0
(Ricki Conrey) w/10 request*	0
(Ricki Conrey) w/10 respon*	0
(Ricki Conrey) w/10 review	0
(Ricki Conrey) w/10 said	0
(Ricki Conrey) w/10 say*	0
(Ricki Conrey) w/10 spoke*	0
(Ricki Conrey) w/10 state*	0
(Ricki Conrey) w/10 talk*	0
(Ricki Conrey) w/10 tell	0
(Ricki Conrey) w/10 told	0
(Ricki Conrey) w/10 writ*	0
(Ricki Conrey) w/10 wrote	0
(Robert Silbering) and (5 %)	0
(Robert Silbering) and (5 per cent)	1
(Robert Silbering) and (5 percent)	1
(Robert Silbering) and (agent oversight)	2
(Robert Silbering) and (Business Solutions)	2
(Robert Silbering) and (Custom House)	2

Search Term	Count
(Robert Silbering) and (five per cent)	1
(Robert Silbering) and (five percent)	1
(Robert Silbering) and (Implementation Plan)	2
(Robert Silbering) and (know your agent)	2
(Robert Silbering) and (money order)	2
(Robert Silbering) and (Periodic Review*)	2
(Robert Silbering) and (pre-paid)	2
(Robert Silbering) and (risk assessment*)	2
(Robert Silbering) and (Western Union Business Solutions)	2
(Robert Silbering) and (WU Business Solutions)	1
(Robert Silbering) and 5%	2
(Robert Silbering) and interdict*	2
(Robert Silbering) and KYA	2
(Robert Silbering) and MIP*	0
(Robert Silbering) and prepaid	2
(Robert Silbering) and Recommendation*	2
(Robert Silbering) and Travelex	2
(Robert Silbering) and WUBS	2
(Robert Silbering) w/10 ask*	0
(Robert Silbering) w/10 call*	0
(Robert Silbering) w/10 demand*	0
(Robert Silbering) w/10 email*	0
(Robert Silbering) w/10 e-mail*	0
(Robert Silbering) w/10 evaluat*	0
(Robert Silbering) w/10 plan	0
(Robert Silbering) w/10 propos*	0
(Robert Silbering) w/10 recommend*	0
(Robert Silbering) w/10 report*	1
(Robert Silbering) w/10 request*	0
(Robert Silbering) w/10 respon*	0
(Robert Silbering) w/10 review	0
(Robert Silbering) w/10 said	0
(Robert Silbering) w/10 say*	0
(Robert Silbering) w/10 spoke*	0
(Robert Silbering) w/10 state*	0
(Robert Silbering) w/10 talk*	0
(Robert Silbering) w/10 tell	0
(Robert Silbering) w/10 told	0
(Robert Silbering) w/10 writ*	0
(Robert Silbering) w/10 wrote	0
(Sarah Schuyler) and (5 %)	0
(Sarah Schuyler) and (5 per cent)	1
(Sarah Schuyler) and (5 percent)	1
(Sarah Schuyler) and (agent oversight)	4
(Sarah Schuyler) and (Business Solutions)	1
(Sarah Schuyler) and (Custom House)	1
(Sarah Schuyler) and (five per cent)	1
(Sarah Schuyler) and (five percent)	1
(Sarah Schuyler) and (Implementation Plan)	1
(Sarah Schuyler) and (know your agent)	1
(Sarah Schuyler) and (money order)	1
(Sarah Schuyler) and (Periodic Review*)	1
(Sarah Schuyler) and (pre-paid)	1
(Sarah Schuyler) and (risk assessment*)	4
(Sarah Schuyler) and (Western Union Business Solutions)	1
(Sarah Schuyler) and (WU Business Solutions)	1
(Sarah Schuyler) and 5%	37
(Sarah Schuyler) and interdict*	5
(Sarah Schuyler) and KYA	1
(Sarah Schuyler) and MIP*	5
(Sarah Schuyler) and prepaid	4
(Sarah Schuyler) and Recommendation*	16
(Sarah Schuyler) and Travelex	19
(Sarah Schuyler) and WUBS	1
(Sarah Schuyler) w/10 ask*	0
(Sarah Schuyler) w/10 call*	0
(Sarah Schuyler) w/10 demand*	0

Search Term	Count
(Sarah Schuyler) w/10 email*	0
(Sarah Schuyler) w/10 e-mail*	0
(Sarah Schuyler) w/10 evaluat*	0
(Sarah Schuyler) w/10 plan	0
(Sarah Schuyler) w/10 propos*	0
(Sarah Schuyler) w/10 recommend*	1
(Sarah Schuyler) w/10 report*	0
(Sarah Schuyler) w/10 request*	0
(Sarah Schuyler) w/10 respon*	0
(Sarah Schuyler) w/10 review	0
(Sarah Schuyler) w/10 said	0
(Sarah Schuyler) w/10 say*	0
(Sarah Schuyler) w/10 spoke*	0
(Sarah Schuyler) w/10 state*	18
(Sarah Schuyler) w/10 talk*	0
(Sarah Schuyler) w/10 tell	0
(Sarah Schuyler) w/10 told	0
(Sarah Schuyler) w/10 writ*	0
(Sarah Schuyler) w/10 wrote	0
(Steven Escaravage) and (5 %)	0
(Steven Escaravage) and (5 per cent)	1
(Steven Escaravage) and (5 percent)	1
(Steven Escaravage) and (agent oversight)	1
(Steven Escaravage) and (Business Solutions)	1
(Steven Escaravage) and (Custom House)	1
(Steven Escaravage) and (five per cent)	1
(Steven Escaravage) and (five percent)	1
(Steven Escaravage) and (Implementation Plan)	1
(Steven Escaravage) and (know your agent)	1
(Steven Escaravage) and (money order)	1
(Steven Escaravage) and (Periodic Review*)	1
(Steven Escaravage) and (pre-paid)	1
(Steven Escaravage) and (risk assessment*)	11
(Steven Escaravage) and (Western Union Business Solutions)	1
(Steven Escaravage) and (WU Business Solutions)	1
(Steven Escaravage) and 5%	22
(Steven Escaravage) and interdict*	1
(Steven Escaravage) and KYA	1
(Steven Escaravage) and MIP*	1
(Steven Escaravage) and prepaid	1
(Steven Escaravage) and Recommendation*	1
(Steven Escaravage) and Travelex	1
(Steven Escaravage) and WUBS	1
(Steven Escaravage) w/10 ask*	0
(Steven Escaravage) w/10 call*	0
(Steven Escaravage) w/10 demand*	0
(Steven Escaravage) w/10 email*	0
(Steven Escaravage) w/10 e-mail*	0
(Steven Escaravage) w/10 evaluat*	0
(Steven Escaravage) w/10 plan	0
(Steven Escaravage) w/10 propos*	0
(Steven Escaravage) w/10 recommend*	0
(Steven Escaravage) w/10 report*	0
(Steven Escaravage) w/10 request*	0
(Steven Escaravage) w/10 respon*	0
(Steven Escaravage) w/10 review	0
(Steven Escaravage) w/10 said	0
(Steven Escaravage) w/10 say*	0
(Steven Escaravage) w/10 spoke*	0
(Steven Escaravage) w/10 state*	0
(Steven Escaravage) w/10 talk*	1
(Steven Escaravage) w/10 tell	0
(Steven Escaravage) w/10 told	0
(Steven Escaravage) w/10 writ*	0
(Steven Escaravage) w/10 wrote	0
(Ted Greenberg) and (5 %)	0
(Ted Greenberg) and (5 per cent)	1

Search Term	Count
(Ted Greenberg) and (5 percent)	3
(Ted Greenberg) and (agent oversight)	1
(Ted Greenberg) and (Business Solutions)	7
(Ted Greenberg) and (Custom House)	4
(Ted Greenberg) and (five per cent)	1
(Ted Greenberg) and (five percent)	2
(Ted Greenberg) and (Implementation Plan)	4
(Ted Greenberg) and (know your agent)	8
(Ted Greenberg) and (money order)	2
(Ted Greenberg) and (Periodic Review*)	8
(Ted Greenberg) and (pre-paid)	29
(Ted Greenberg) and (risk assessment*)	227
(Ted Greenberg) and (Western Union Business Solutions)	7
(Ted Greenberg) and (WU Business Solutions)	1
(Ted Greenberg) and 5%	197
(Ted Greenberg) and interdict*	121
(Ted Greenberg) and KYA	82
(Ted Greenberg) and MIP*	82
(Ted Greenberg) and prepaid	23
(Ted Greenberg) and Recommendation*	156
(Ted Greenberg) and Travelex	7
(Ted Greenberg) and WUBS	114
(Ted Greenberg) w/10 ask*	3
(Ted Greenberg) w/10 call*	1
(Ted Greenberg) w/10 demand*	0
(Ted Greenberg) w/10 email*	2
(Ted Greenberg) w/10 e-mail*	0
(Ted Greenberg) w/10 evaluat*	0
(Ted Greenberg) w/10 plan	3
(Ted Greenberg) w/10 propos*	8
(Ted Greenberg) w/10 recommend*	19
(Ted Greenberg) w/10 report*	14
(Ted Greenberg) w/10 request*	26
(Ted Greenberg) w/10 respon*	13
(Ted Greenberg) w/10 review	7
(Ted Greenberg) w/10 said	3
(Ted Greenberg) w/10 say*	0
(Ted Greenberg) w/10 spoke*	0
(Ted Greenberg) w/10 state*	10
(Ted Greenberg) w/10 talk*	0
(Ted Greenberg) w/10 tell	0
(Ted Greenberg) w/10 told	0
(Ted Greenberg) w/10 writ*	6
(Ted Greenberg) w/10 wrote	1
(WUmonitor@gmail com) and (5 %)	0
(WUmonitor@gmail com) and (5 per cent)	1
(WUmonitor@gmail com) and (5 percent)	3
(WUmonitor@gmail com) and (agent oversight)	1
(WUmonitor@gmail com) and (Business Solutions)	1
(WUmonitor@gmail com) and (Custom House)	1
(WUmonitor@gmail com) and (five per cent)	1
(WUmonitor@gmail com) and (five percent)	1
(WUmonitor@gmail com) and (Implementation Plan)	10
(WUmonitor@gmail com) and (know your agent)	1
(WUmonitor@gmail com) and (money order)	3
(WUmonitor@gmail com) and (Periodic Review*)	1
(WUmonitor@gmail com) and (pre-paid)	1
(WUmonitor@gmail com) and (risk assessment*)	35
(WUmonitor@gmail com) and (Western Union Business Solutions)	1
(WUmonitor@gmail com) and (WU Business Solutions)	1
(WUmonitor@gmail com) and 5%	45
(WUmonitor@gmail com) and interdict*	1
(WUmonitor@gmail com) and KYA	3
(WUmonitor@gmail com) and MIP*	0
(WUmonitor@gmail com) and prepaid	1
(WUmonitor@gmail com) and Recommendation*	40
(WUmonitor@gmail com) and Travelex	1

Search Term	Count
(WUmonitor@gmail com) and WUBS	1
(WUmonitor@gmail com) w/10 ask*	0
(WUmonitor@gmail com) w/10 call*	6
(WUmonitor@gmail com) w/10 demand*	0
(WUmonitor@gmail com) w/10 email*	9
(WUmonitor@gmail com) w/10 e-mail*	1
(WUmonitor@gmail com) w/10 evaluat*	0
(WUmonitor@gmail com) w/10 plan	0
(WUmonitor@gmail com) w/10 propos*	3
(WUmonitor@gmail com) w/10 recommend*	3
(WUmonitor@gmail com) w/10 report*	0
(WUmonitor@gmail com) w/10 request*	9
(WUmonitor@gmail com) w/10 respon*	4
(WUmonitor@gmail com) w/10 review	0
(WUmonitor@gmail com) w/10 said	0
(WUmonitor@gmail com) w/10 say*	0
(WUmonitor@gmail com) w/10 spoke*	0
(WUmonitor@gmail com) w/10 state*	3
(WUmonitor@gmail com) w/10 talk*	0
(WUmonitor@gmail com) w/10 tell	0
(WUmonitor@gmail com) w/10 told	0
(WUmonitor@gmail com) w/10 writ*	0
(WUmonitor@gmail com) w/10 wrote	0
(WUmonitor2012@gmail com) and (5 %)	0
(WUmonitor2012@gmail com) and (5 per cent)	0
(WUmonitor2012@gmail com) and (5 percent)	0
(WUmonitor2012@gmail com) and (agent oversight)	0
(WUmonitor2012@gmail com) and (Business Solutions)	0
(WUmonitor2012@gmail com) and (Custom House)	0
(WUmonitor2012@gmail com) and (five per cent)	0
(WUmonitor2012@gmail com) and (five percent)	0
(WUmonitor2012@gmail com) and (Implementation Plan)	0
(WUmonitor2012@gmail com) and (know your agent)	0
(WUmonitor2012@gmail com) and (money order)	0
(WUmonitor2012@gmail com) and (Periodic Review*)	0
(WUmonitor2012@gmail com) and (pre-paid)	0
(WUmonitor2012@gmail com) and (risk assessment*)	3
(WUmonitor2012@gmail com) and (Western Union Business Solutions)	0
(WUmonitor2012@gmail com) and (WU Business Solutions)	0
(WUmonitor2012@gmail com) and 5%	3
(WUmonitor2012@gmail com) and interdict*	0
(WUmonitor2012@gmail com) and KYA	0
(WUmonitor2012@gmail com) and MIP*	1
(WUmonitor2012@gmail com) and prepaid	0
(WUmonitor2012@gmail com) and Recommendation*	0
(WUmonitor2012@gmail com) and Travelex	0
(WUmonitor2012@gmail com) and WUBS	0
(WUmonitor2012@gmail com) w/10 ask*	0
(WUmonitor2012@gmail com) w/10 call*	0
(WUmonitor2012@gmail com) w/10 demand*	0
(WUmonitor2012@gmail com) w/10 email*	0
(WUmonitor2012@gmail com) w/10 e-mail*	0
(WUmonitor2012@gmail com) w/10 evaluat*	0
(WUmonitor2012@gmail com) w/10 plan	0
(WUmonitor2012@gmail com) w/10 propos*	0
(WUmonitor2012@gmail com) w/10 recommend*	0
(WUmonitor2012@gmail com) w/10 report*	0
(WUmonitor2012@gmail com) w/10 request*	0
(WUmonitor2012@gmail com) w/10 respon*	0
(WUmonitor2012@gmail com) w/10 review	0
(WUmonitor2012@gmail com) w/10 said	0
(WUmonitor2012@gmail com) w/10 say*	0
(WUmonitor2012@gmail com) w/10 spoke*	0
(WUmonitor2012@gmail com) w/10 state*	0
(WUmonitor2012@gmail com) w/10 talk*	0
(WUmonitor2012@gmail com) w/10 tell	0
(WUmonitor2012@gmail com) w/10 told	0

Search Term	Count
(WUmonitor2012@gmail.com) w/10 writ*	0
(WUmonitor2012@gmail.com) w/10 wrote	0
(Wyn Clark) and (5 %)	0
(Wyn Clark) and (5 per cent)	1
(Wyn Clark) and (5 percent)	1
(Wyn Clark) and (agent oversight)	1
(Wyn Clark) and (Business Solutions)	1
(Wyn Clark) and (Custom House)	1
(Wyn Clark) and (five per cent)	1
(Wyn Clark) and (five percent)	1
(Wyn Clark) and (Implementation Plan)	1
(Wyn Clark) and (know your agent)	1
(Wyn Clark) and (money order)	3
(Wyn Clark) and (Periodic Review*)	1
(Wyn Clark) and (pre-paid)	14
(Wyn Clark) and (risk assessment*)	49
(Wyn Clark) and (Western Union Business Solutions)	1
(Wyn Clark) and (WU Business Solutions)	1
(Wyn Clark) and 5%	57
(Wyn Clark) and interdict*	54
(Wyn Clark) and KYA	47
(Wyn Clark) and MIP*	42
(Wyn Clark) and prepaid	1
(Wyn Clark) and Recommendation*	42
(Wyn Clark) and Travelex	1
(Wyn Clark) and WUBS	49
(Wyn Clark) w/10 ask*	0
(Wyn Clark) w/10 call*	3
(Wyn Clark) w/10 demand*	0
(Wyn Clark) w/10 email*	0
(Wyn Clark) w/10 e-mail*	0
(Wyn Clark) w/10 evaluat*	0
(Wyn Clark) w/10 plan	2
(Wyn Clark) w/10 propos*	0
(Wyn Clark) w/10 recommend*	0
(Wyn Clark) w/10 report*	0
(Wyn Clark) w/10 request*	0
(Wyn Clark) w/10 respon*	0
(Wyn Clark) w/10 review	0
(Wyn Clark) w/10 said	0
(Wyn Clark) w/10 say*	0
(Wyn Clark) w/10 spoke*	0
(Wyn Clark) w/10 state*	0
(Wyn Clark) w/10 talk*	0
(Wyn Clark) w/10 tell	0
(Wyn Clark) w/10 told	0
(Wyn Clark) w/10 writ*	0
(Wyn Clark) w/10 wrote	0
Entire Set	21103

Search Term	Count	BRANDT	FARAH	PORTER
"Greenberg" and (5 %)	0	0	0	0
"Greenberg" w/10 demand*	0	0	0	0
"Greenberg" w/10 e-mail*	0	0	0	0
"Greenberg" w/10 spoke*	0	0	0	0
"Greenberg" w/10 tell	0	0	0	0
"Greenberg" w/10 told	0	0	0	0
"Keene" and (5 %)	0	0	0	0
"Keene" w/10 demand*	0	0	0	0
"Keene" w/10 e-mail*	0	0	0	0
"Keene" w/10 said	0	0	0	0
"Keene" w/10 spoke*	0	0	0	0
"Keene" w/10 tell	0	0	0	0
"Keene" w/10 told	0	0	0	0
"Lonnie" and (5 %)	0	0	0	0
"Monitor" and (5 %)	0	0	0	0
"Monitorship" and (5 %)	0	0	0	0
"Monitorship" w/10 ask*	0	0	0	0
"Monitorship" w/10 call*	0	0	0	0
"Monitorship" w/10 demand*	0	0	0	0
"Monitorship" w/10 email*	0	0	0	0
"Monitorship" w/10 e-mail*	0	0	0	0
"Monitorship" w/10 said	0	0	0	0
"Monitorship" w/10 spoke*	0	0	0	0
"Monitorship" w/10 talk*	0	0	0	0
"Monitorship" w/10 tell	0	0	0	0
"Monitorship" w/10 told	0	0	0	0
"Monitorship" w/10 writ*	0	0	0	0
"SWB Monitor" and (5 %)	0	0	0	0
"SWB Monitor" w/10 demand*	0	0	0	0
"SWB Monitor" w/10 e-mail*	0	0	0	0
"SWB Monitor" w/10 evaluat*	0	0	0	0
"SWB Monitor" w/10 say*	0	0	0	0
"SWB Monitor" w/10 told	0	0	0	0
"SWB Monitor" w/10 wrote	0	0	0	0
"SWBA Monitor" and (5 %)	0	0	0	0
"SWBA Monitor" w/10 ask*	0	0	0	0
"SWBA Monitor" w/10 call*	0	0	0	0
"SWBA Monitor" w/10 demand*	0	0	0	0
"SWBA Monitor" w/10 email*	0	0	0	0
"SWBA Monitor" w/10 e-mail*	0	0	0	0
"SWBA Monitor" w/10 evaluat*	0	0	0	0
"SWBA Monitor" w/10 plan	0	0	0	0
"SWBA Monitor" w/10 propos*	0	0	0	0
"SWBA Monitor" w/10 recommend*	0	0	0	0
"SWBA Monitor" w/10 request*	0	0	0	0
"SWBA Monitor" w/10 respon*	0	0	0	0
"SWBA Monitor" w/10 said	0	0	0	0
"SWBA Monitor" w/10 say*	0	0	0	0
"SWBA Monitor" w/10 spoke*	0	0	0	0
"SWBA Monitor" w/10 state*	0	0	0	0
"SWBA Monitor" w/10 talk*	0	0	0	0
"SWBA Monitor" w/10 tell	0	0	0	0
"SWBA Monitor" w/10 told	0	0	0	0
"SWBA Monitor" w/10 wrote	0	0	0	0
"Ted" and (5 %)	0	0	0	0
"the Monitor" and (5 %)	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 %)	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) and MIP*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 ask*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 call*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 demand*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 email*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 e-mail*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 evaluat*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 plan	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 propos*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 recommend*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 report*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 request*	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 respon*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 review	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 said	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 say*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 spoke*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 state*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 talk*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 tell	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 told	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 writ*	0	0	0	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 wrote	0	0	0	0
(*@WUmonitor com) and (5 %)	0	0	0	0
(*@WUmonitor com) and (5 per cent)	0	0	0	0
(*@WUmonitor com) and (agent oversight)	0	0	0	0
(*@WUmonitor com) and (Custom House)	0	0	0	0
(*@WUmonitor com) and (five per cent)	0	0	0	0
(*@WUmonitor com) and (Implementation Plan)	0	0	0	0
(*@WUmonitor com) and (pre-paid)	0	0	0	0
(*@WUmonitor com) and (WU Business Solutions)	0	0	0	0
(*@WUmonitor com) and Travelex	0	0	0	0
(*@WUmonitor com) w/10 ask*	0	0	0	0
(*@WUmonitor com) w/10 demand*	0	0	0	0
(*@WUmonitor com) w/10 e-mail*	0	0	0	0
(*@WUmonitor com) w/10 evaluat*	0	0	0	0
(*@WUmonitor com) w/10 recommend*	0	0	0	0
(*@WUmonitor com) w/10 said	0	0	0	0
(*@WUmonitor com) w/10 say*	0	0	0	0
(*@WUmonitor com) w/10 spoke*	0	0	0	0
(*@WUmonitor com) w/10 talk*	0	0	0	0
(*@WUmonitor com) w/10 tell	0	0	0	0
(*@WUmonitor com) w/10 told	0	0	0	0
(*@WUmonitor com) w/10 writ*	0	0	0	0
(Dennis Lormel) and (5 %)	0	0	0	0
(Dennis Lormel) w/10 demand*	0	0	0	0
(Dennis Lormel) w/10 e-mail*	0	0	0	0
(Dennis Lormel) w/10 evaluat*	0	0	0	0
(Dennis Lormel) w/10 report*	0	0	0	0
(Dennis Lormel) w/10 spoke*	0	0	0	0
(Dennis Lormel) w/10 talk*	0	0	0	0
(Dennis Lormel) w/10 tell	0	0	0	0
(Dennis Lormel) w/10 told	0	0	0	0
(Dennis Lormel) w/10 wrote	0	0	0	0
(Douglas Meadows) and (5 %)	0	0	0	0
(Douglas Meadows) w/10 ask*	0	0	0	0
(Douglas Meadows) w/10 demand*	0	0	0	0
(Douglas Meadows) w/10 e-mail*	0	0	0	0
(Douglas Meadows) w/10 evaluat*	0	0	0	0
(Douglas Meadows) w/10 plan	0	0	0	0
(Douglas Meadows) w/10 propos*	0	0	0	0
(Douglas Meadows) w/10 report*	0	0	0	0
(Douglas Meadows) w/10 respon*	0	0	0	0
(Douglas Meadows) w/10 review	0	0	0	0
(Douglas Meadows) w/10 said	0	0	0	0
(Douglas Meadows) w/10 say*	0	0	0	0
(Douglas Meadows) w/10 spoke*	0	0	0	0
(Douglas Meadows) w/10 state*	0	0	0	0
(Douglas Meadows) w/10 talk*	0	0	0	0
(Douglas Meadows) w/10 tell	0	0	0	0
(Douglas Meadows) w/10 told	0	0	0	0
(Douglas Meadows) w/10 writ*	0	0	0	0
(Douglas Meadows) w/10 wrote	0	0	0	0
(Ernest Sohn) and (5 %)	0	0	0	0
(Ernest Sohn) w/10 ask*	0	0	0	0
(Ernest Sohn) w/10 call*	0	0	0	0
(Ernest Sohn) w/10 demand*	0	0	0	0
(Ernest Sohn) w/10 email*	0	0	0	0
(Ernest Sohn) w/10 e-mail*	0	0	0	0
(Ernest Sohn) w/10 evaluat*	0	0	0	0
(Ernest Sohn) w/10 plan	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Ernest Sohn) w/10 propos*	0	0	0	0
(Ernest Sohn) w/10 recommend*	0	0	0	0
(Ernest Sohn) w/10 report*	0	0	0	0
(Ernest Sohn) w/10 request*	0	0	0	0
(Ernest Sohn) w/10 respon*	0	0	0	0
(Ernest Sohn) w/10 review	0	0	0	0
(Ernest Sohn) w/10 said	0	0	0	0
(Ernest Sohn) w/10 say*	0	0	0	0
(Ernest Sohn) w/10 spoke*	0	0	0	0
(Ernest Sohn) w/10 state*	0	0	0	0
(Ernest Sohn) w/10 talk*	0	0	0	0
(Ernest Sohn) w/10 tell	0	0	0	0
(Ernest Sohn) w/10 told	0	0	0	0
(Ernest Sohn) w/10 writ*	0	0	0	0
(Ernest Sohn) w/10 wrote	0	0	0	0
(JD Hannick) and (5 %)	0	0	0	0
(JD Hannick) w/10 ask*	0	0	0	0
(JD Hannick) w/10 call*	0	0	0	0
(JD Hannick) w/10 demand*	0	0	0	0
(JD Hannick) w/10 email*	0	0	0	0
(JD Hannick) w/10 e-mail*	0	0	0	0
(JD Hannick) w/10 evaluat*	0	0	0	0
(JD Hannick) w/10 plan	0	0	0	0
(JD Hannick) w/10 propos*	0	0	0	0
(JD Hannick) w/10 recommend*	0	0	0	0
(JD Hannick) w/10 report*	0	0	0	0
(JD Hannick) w/10 request*	0	0	0	0
(JD Hannick) w/10 respon*	0	0	0	0
(JD Hannick) w/10 review	0	0	0	0
(JD Hannick) w/10 said	0	0	0	0
(JD Hannick) w/10 say*	0	0	0	0
(JD Hannick) w/10 spoke*	0	0	0	0
(JD Hannick) w/10 state*	0	0	0	0
(JD Hannick) w/10 talk*	0	0	0	0
(JD Hannick) w/10 tell	0	0	0	0
(JD Hannick) w/10 told	0	0	0	0
(JD Hannick) w/10 writ*	0	0	0	0
(JD Hannick) w/10 wrote	0	0	0	0
(Jeff Hunter) and (5 %)	0	0	0	0
(Jeff Hunter) w/10 ask*	0	0	0	0
(Jeff Hunter) w/10 call*	0	0	0	0
(Jeff Hunter) w/10 demand*	0	0	0	0
(Jeff Hunter) w/10 email*	0	0	0	0
(Jeff Hunter) w/10 e-mail*	0	0	0	0
(Jeff Hunter) w/10 evaluat*	0	0	0	0
(Jeff Hunter) w/10 plan	0	0	0	0
(Jeff Hunter) w/10 propos*	0	0	0	0
(Jeff Hunter) w/10 recommend*	0	0	0	0
(Jeff Hunter) w/10 report*	0	0	0	0
(Jeff Hunter) w/10 request*	0	0	0	0
(Jeff Hunter) w/10 respon*	0	0	0	0
(Jeff Hunter) w/10 review	0	0	0	0
(Jeff Hunter) w/10 said	0	0	0	0
(Jeff Hunter) w/10 say*	0	0	0	0
(Jeff Hunter) w/10 spoke*	0	0	0	0
(Jeff Hunter) w/10 state*	0	0	0	0
(Jeff Hunter) w/10 talk*	0	0	0	0
(Jeff Hunter) w/10 tell	0	0	0	0
(Jeff Hunter) w/10 told	0	0	0	0
(Jeff Hunter) w/10 writ*	0	0	0	0
(Jeff Hunter) w/10 wrote	0	0	0	0
(John Bell) and (5 %)	0	0	0	0
(John Bell) w/10 demand*	0	0	0	0
(John Bell) w/10 e-mail*	0	0	0	0
(John Bell) w/10 evaluat*	0	0	0	0
(John Bell) w/10 propos*	0	0	0	0
(John Bell) w/10 report*	0	0	0	0
(John Bell) w/10 said	0	0	0	0
(John Bell) w/10 say*	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(John Bell) w/10 spoke*	0	0	0	0
(John Bell) w/10 tell	0	0	0	0
(John Bell) w/10 told	0	0	0	0
(John Bell) w/10 writ*	0	0	0	0
(John Bell) w/10 wrote	0	0	0	0
(John De Wulf) and (5 %)	0	0	0	0
(John De Wulf) and (5 per cent)	0	0	0	0
(John De Wulf) and (5 percent)	0	0	0	0
(John De Wulf) and (agent oversight)	0	0	0	0
(John De Wulf) and (Business Solutions)	0	0	0	0
(John De Wulf) and (Custom House)	0	0	0	0
(John De Wulf) and (five per cent)	0	0	0	0
(John De Wulf) and (five percent)	0	0	0	0
(John De Wulf) and (Implementation Plan)	0	0	0	0
(John De Wulf) and (know your agent)	0	0	0	0
(John De Wulf) and (money order)	0	0	0	0
(John De Wulf) and (Periodic Review*)	0	0	0	0
(John De Wulf) and (pre-paid)	0	0	0	0
(John De Wulf) and (risk assessment*)	0	0	0	0
(John De Wulf) and (Western Union Business Solutions)	0	0	0	0
(John De Wulf) and (WU Business Solutions)	0	0	0	0
(John De Wulf) and 5%	0	0	0	0
(John De Wulf) and interdict*	0	0	0	0
(John De Wulf) and KYA	0	0	0	0
(John De Wulf) and MIP*	0	0	0	0
(John De Wulf) and prepaid	0	0	0	0
(John De Wulf) and Recommendation*	0	0	0	0
(John De Wulf) and Travelex	0	0	0	0
(John De Wulf) and WUBS	0	0	0	0
(John De Wulf) w/10 ask*	0	0	0	0
(John De Wulf) w/10 call*	0	0	0	0
(John De Wulf) w/10 demand*	0	0	0	0
(John De Wulf) w/10 email*	0	0	0	0
(John De Wulf) w/10 e-mail*	0	0	0	0
(John De Wulf) w/10 evaluat*	0	0	0	0
(John De Wulf) w/10 plan	0	0	0	0
(John De Wulf) w/10 propos*	0	0	0	0
(John De Wulf) w/10 recommend*	0	0	0	0
(John De Wulf) w/10 report*	0	0	0	0
(John De Wulf) w/10 request*	0	0	0	0
(John De Wulf) w/10 respon*	0	0	0	0
(John De Wulf) w/10 review	0	0	0	0
(John De Wulf) w/10 said	0	0	0	0
(John De Wulf) w/10 say*	0	0	0	0
(John De Wulf) w/10 spoke*	0	0	0	0
(John De Wulf) w/10 state*	0	0	0	0
(John De Wulf) w/10 talk*	0	0	0	0
(John De Wulf) w/10 tell	0	0	0	0
(John De Wulf) w/10 told	0	0	0	0
(John De Wulf) w/10 writ*	0	0	0	0
(John De Wulf) w/10 wrote	0	0	0	0
(John Knapp) and (5 %)	0	0	0	0
(John Knapp) w/10 demand*	0	0	0	0
(John Knapp) w/10 e-mail*	0	0	0	0
(John Knapp) w/10 evaluat*	0	0	0	0
(John Knapp) w/10 said	0	0	0	0
(John Knapp) w/10 say*	0	0	0	0
(John Knapp) w/10 talk*	0	0	0	0
(John Knapp) w/10 told	0	0	0	0
(John Knapp) w/10 writ*	0	0	0	0
(John Knapp) w/10 wrote	0	0	0	0
(Lisa Dawson) and (5 %)	0	0	0	0
(Lisa Dawson) and MIP*	0	0	0	0
(Lisa Dawson) w/10 ask*	0	0	0	0
(Lisa Dawson) w/10 call*	0	0	0	0
(Lisa Dawson) w/10 demand*	0	0	0	0
(Lisa Dawson) w/10 email*	0	0	0	0
(Lisa Dawson) w/10 e-mail*	0	0	0	0
(Lisa Dawson) w/10 evaluat*	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Lisa Dawson) w/10 plan	0	0	0	0
(Lisa Dawson) w/10 propos*	0	0	0	0
(Lisa Dawson) w/10 report*	0	0	0	0
(Lisa Dawson) w/10 respon*	0	0	0	0
(Lisa Dawson) w/10 said	0	0	0	0
(Lisa Dawson) w/10 say*	0	0	0	0
(Lisa Dawson) w/10 spoke*	0	0	0	0
(Lisa Dawson) w/10 state*	0	0	0	0
(Lisa Dawson) w/10 talk*	0	0	0	0
(Lisa Dawson) w/10 tell	0	0	0	0
(Lisa Dawson) w/10 told	0	0	0	0
(Lisa Dawson) w/10 writ*	0	0	0	0
(Lisa Dawson) w/10 wrote	0	0	0	0
(Lonnie Keene) and (5 %)	0	0	0	0
(Lonnie Keene) w/10 demand*	0	0	0	0
(Lonnie Keene) w/10 e-mail*	0	0	0	0
(Lonnie Keene) w/10 said	0	0	0	0
(Lonnie Keene) w/10 say*	0	0	0	0
(Lonnie Keene) w/10 spoke*	0	0	0	0
(Lonnie Keene) w/10 talk*	0	0	0	0
(Lonnie Keene) w/10 tell	0	0	0	0
(Lonnie Keene) w/10 told	0	0	0	0
(Matt Derstine) and (5 %)	0	0	0	0
(Matt Derstine) and MIP*	0	0	0	0
(Matt Derstine) w/10 ask*	0	0	0	0
(Matt Derstine) w/10 call*	0	0	0	0
(Matt Derstine) w/10 demand*	0	0	0	0
(Matt Derstine) w/10 email*	0	0	0	0
(Matt Derstine) w/10 e-mail*	0	0	0	0
(Matt Derstine) w/10 evaluat*	0	0	0	0
(Matt Derstine) w/10 plan	0	0	0	0
(Matt Derstine) w/10 propos*	0	0	0	0
(Matt Derstine) w/10 recommend*	0	0	0	0
(Matt Derstine) w/10 report*	0	0	0	0
(Matt Derstine) w/10 request*	0	0	0	0
(Matt Derstine) w/10 respon*	0	0	0	0
(Matt Derstine) w/10 review	0	0	0	0
(Matt Derstine) w/10 said	0	0	0	0
(Matt Derstine) w/10 say*	0	0	0	0
(Matt Derstine) w/10 spoke*	0	0	0	0
(Matt Derstine) w/10 state*	0	0	0	0
(Matt Derstine) w/10 talk*	0	0	0	0
(Matt Derstine) w/10 tell	0	0	0	0
(Matt Derstine) w/10 told	0	0	0	0
(Matt Derstine) w/10 writ*	0	0	0	0
(Matt Derstine) w/10 wrote	0	0	0	0
(Michael Ledley) and (5 %)	0	0	0	0
(Michael Ledley) and MIP*	0	0	0	0
(Michael Ledley) w/10 ask*	0	0	0	0
(Michael Ledley) w/10 call*	0	0	0	0
(Michael Ledley) w/10 demand*	0	0	0	0
(Michael Ledley) w/10 email*	0	0	0	0
(Michael Ledley) w/10 e-mail*	0	0	0	0
(Michael Ledley) w/10 evaluat*	0	0	0	0
(Michael Ledley) w/10 plan	0	0	0	0
(Michael Ledley) w/10 propos*	0	0	0	0
(Michael Ledley) w/10 recommend*	0	0	0	0
(Michael Ledley) w/10 report*	0	0	0	0
(Michael Ledley) w/10 request*	0	0	0	0
(Michael Ledley) w/10 respon*	0	0	0	0
(Michael Ledley) w/10 review	0	0	0	0
(Michael Ledley) w/10 said	0	0	0	0
(Michael Ledley) w/10 say*	0	0	0	0
(Michael Ledley) w/10 spoke*	0	0	0	0
(Michael Ledley) w/10 state*	0	0	0	0
(Michael Ledley) w/10 talk*	0	0	0	0
(Michael Ledley) w/10 tell	0	0	0	0
(Michael Ledley) w/10 told	0	0	0	0
(Michael Ledley) w/10 writ*	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Michael Ledley) w/10 wrote	0	0	0	0
(Nick Nahas) and (5 %)	0	0	0	0
(Nick Nahas) and MIP*	0	0	0	0
(Nick Nahas) w/10 ask*	0	0	0	0
(Nick Nahas) w/10 call*	0	0	0	0
(Nick Nahas) w/10 demand*	0	0	0	0
(Nick Nahas) w/10 email*	0	0	0	0
(Nick Nahas) w/10 e-mail*	0	0	0	0
(Nick Nahas) w/10 evaluat*	0	0	0	0
(Nick Nahas) w/10 plan	0	0	0	0
(Nick Nahas) w/10 propos*	0	0	0	0
(Nick Nahas) w/10 recommend*	0	0	0	0
(Nick Nahas) w/10 report*	0	0	0	0
(Nick Nahas) w/10 request*	0	0	0	0
(Nick Nahas) w/10 respon*	0	0	0	0
(Nick Nahas) w/10 review	0	0	0	0
(Nick Nahas) w/10 said	0	0	0	0
(Nick Nahas) w/10 say*	0	0	0	0
(Nick Nahas) w/10 spoke*	0	0	0	0
(Nick Nahas) w/10 state*	0	0	0	0
(Nick Nahas) w/10 talk*	0	0	0	0
(Nick Nahas) w/10 tell	0	0	0	0
(Nick Nahas) w/10 told	0	0	0	0
(Nick Nahas) w/10 writ*	0	0	0	0
(Nick Nahas) w/10 wrote	0	0	0	0
(Patrick Mahon) and (5 %)	0	0	0	0
(Patrick Mahon) and MIP*	0	0	0	0
(Patrick Mahon) w/10 ask*	0	0	0	0
(Patrick Mahon) w/10 demand*	0	0	0	0
(Patrick Mahon) w/10 email*	0	0	0	0
(Patrick Mahon) w/10 e-mail*	0	0	0	0
(Patrick Mahon) w/10 evaluat*	0	0	0	0
(Patrick Mahon) w/10 plan	0	0	0	0
(Patrick Mahon) w/10 propos*	0	0	0	0
(Patrick Mahon) w/10 recommend*	0	0	0	0
(Patrick Mahon) w/10 report*	0	0	0	0
(Patrick Mahon) w/10 request*	0	0	0	0
(Patrick Mahon) w/10 respon*	0	0	0	0
(Patrick Mahon) w/10 review	0	0	0	0
(Patrick Mahon) w/10 said	0	0	0	0
(Patrick Mahon) w/10 say*	0	0	0	0
(Patrick Mahon) w/10 spoke*	0	0	0	0
(Patrick Mahon) w/10 talk*	0	0	0	0
(Patrick Mahon) w/10 tell	0	0	0	0
(Patrick Mahon) w/10 told	0	0	0	0
(Patrick Mahon) w/10 writ*	0	0	0	0
(Patrick Mahon) w/10 wrote	0	0	0	0
(Paul Lewis) and (5 %)	0	0	0	0
(Paul Lewis) w/10 ask*	0	0	0	0
(Paul Lewis) w/10 demand*	0	0	0	0
(Paul Lewis) w/10 e-mail*	0	0	0	0
(Paul Lewis) w/10 evaluat*	0	0	0	0
(Paul Lewis) w/10 plan	0	0	0	0
(Paul Lewis) w/10 propos*	0	0	0	0
(Paul Lewis) w/10 said	0	0	0	0
(Paul Lewis) w/10 say*	0	0	0	0
(Paul Lewis) w/10 spoke*	0	0	0	0
(Paul Lewis) w/10 talk*	0	0	0	0
(Paul Lewis) w/10 tell	0	0	0	0
(Paul Lewis) w/10 told	0	0	0	0
(Paul Lewis) w/10 writ*	0	0	0	0
(Paul Lewis) w/10 wrote	0	0	0	0
(Rachele Byrne) and (5 %)	0	0	0	0
(Rachele Byrne) and (5 per cent)	0	0	0	0
(Rachele Byrne) and (5 percent)	0	0	0	0
(Rachele Byrne) and (agent oversight)	0	0	0	0
(Rachele Byrne) and (Business Solutions)	0	0	0	0
(Rachele Byrne) and (Custom House)	0	0	0	0
(Rachele Byrne) and (five per cent)	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Rachele Byrne) and (five percent)	0	0	0	0
(Rachele Byrne) and (Implementation Plan)	0	0	0	0
(Rachele Byrne) and (know your agent)	0	0	0	0
(Rachele Byrne) and (money order)	0	0	0	0
(Rachele Byrne) and (Periodic Review*)	0	0	0	0
(Rachele Byrne) and (pre-paid)	0	0	0	0
(Rachele Byrne) and (risk assessment*)	0	0	0	0
(Rachele Byrne) and (Western Union Business Solutions)	0	0	0	0
(Rachele Byrne) and (WU Business Solutions)	0	0	0	0
(Rachele Byrne) and 5%	0	0	0	0
(Rachele Byrne) and interdict*	0	0	0	0
(Rachele Byrne) and KYA	0	0	0	0
(Rachele Byrne) and MIP*	0	0	0	0
(Rachele Byrne) and prepaid	0	0	0	0
(Rachele Byrne) and Recommendation*	0	0	0	0
(Rachele Byrne) and Travelex	0	0	0	0
(Rachele Byrne) and WUBS	0	0	0	0
(Rachele Byrne) w/10 ask*	0	0	0	0
(Rachele Byrne) w/10 call*	0	0	0	0
(Rachele Byrne) w/10 demand*	0	0	0	0
(Rachele Byrne) w/10 email*	0	0	0	0
(Rachele Byrne) w/10 e-mail*	0	0	0	0
(Rachele Byrne) w/10 evaluat*	0	0	0	0
(Rachele Byrne) w/10 plan	0	0	0	0
(Rachele Byrne) w/10 propos*	0	0	0	0
(Rachele Byrne) w/10 recommend*	0	0	0	0
(Rachele Byrne) w/10 report*	0	0	0	0
(Rachele Byrne) w/10 request*	0	0	0	0
(Rachele Byrne) w/10 respon*	0	0	0	0
(Rachele Byrne) w/10 review	0	0	0	0
(Rachele Byrne) w/10 said	0	0	0	0
(Rachele Byrne) w/10 say*	0	0	0	0
(Rachele Byrne) w/10 spoke*	0	0	0	0
(Rachele Byrne) w/10 state*	0	0	0	0
(Rachele Byrne) w/10 talk*	0	0	0	0
(Rachele Byrne) w/10 tell	0	0	0	0
(Rachele Byrne) w/10 told	0	0	0	0
(Rachele Byrne) w/10 writ*	0	0	0	0
(Rachele Byrne) w/10 wrote	0	0	0	0
(Reynold Benjamin) and (5 %)	0	0	0	0
(Reynold Benjamin) and MIP*	0	0	0	0
(Reynold Benjamin) w/10 ask*	0	0	0	0
(Reynold Benjamin) w/10 call*	0	0	0	0
(Reynold Benjamin) w/10 demand*	0	0	0	0
(Reynold Benjamin) w/10 email*	0	0	0	0
(Reynold Benjamin) w/10 e-mail*	0	0	0	0
(Reynold Benjamin) w/10 evaluat*	0	0	0	0
(Reynold Benjamin) w/10 plan	0	0	0	0
(Reynold Benjamin) w/10 propos*	0	0	0	0
(Reynold Benjamin) w/10 recommend*	0	0	0	0
(Reynold Benjamin) w/10 report*	0	0	0	0
(Reynold Benjamin) w/10 request*	0	0	0	0
(Reynold Benjamin) w/10 respon*	0	0	0	0
(Reynold Benjamin) w/10 review	0	0	0	0
(Reynold Benjamin) w/10 said	0	0	0	0
(Reynold Benjamin) w/10 say*	0	0	0	0
(Reynold Benjamin) w/10 spoke*	0	0	0	0
(Reynold Benjamin) w/10 state*	0	0	0	0
(Reynold Benjamin) w/10 talk*	0	0	0	0
(Reynold Benjamin) w/10 tell	0	0	0	0
(Reynold Benjamin) w/10 told	0	0	0	0
(Reynold Benjamin) w/10 writ*	0	0	0	0
(Reynold Benjamin) w/10 wrote	0	0	0	0
(Ricki Conrey) and (5 %)	0	0	0	0
(Ricki Conrey) w/10 ask*	0	0	0	0
(Ricki Conrey) w/10 call*	0	0	0	0
(Ricki Conrey) w/10 demand*	0	0	0	0
(Ricki Conrey) w/10 email*	0	0	0	0
(Ricki Conrey) w/10 e-mail*	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Ricki Conrey) w/10 evaluat*	0	0	0	0
(Ricki Conrey) w/10 plan	0	0	0	0
(Ricki Conrey) w/10 propos*	0	0	0	0
(Ricki Conrey) w/10 recommend*	0	0	0	0
(Ricki Conrey) w/10 report*	0	0	0	0
(Ricki Conrey) w/10 request*	0	0	0	0
(Ricki Conrey) w/10 respon*	0	0	0	0
(Ricki Conrey) w/10 review	0	0	0	0
(Ricki Conrey) w/10 said	0	0	0	0
(Ricki Conrey) w/10 say*	0	0	0	0
(Ricki Conrey) w/10 spoke*	0	0	0	0
(Ricki Conrey) w/10 state*	0	0	0	0
(Ricki Conrey) w/10 talk*	0	0	0	0
(Ricki Conrey) w/10 tell	0	0	0	0
(Ricki Conrey) w/10 told	0	0	0	0
(Ricki Conrey) w/10 writ*	0	0	0	0
(Ricki Conrey) w/10 wrote	0	0	0	0
(Robert Silbering) and (5 %)	0	0	0	0
(Robert Silbering) and MIP*	0	0	0	0
(Robert Silbering) w/10 ask*	0	0	0	0
(Robert Silbering) w/10 call*	0	0	0	0
(Robert Silbering) w/10 demand*	0	0	0	0
(Robert Silbering) w/10 email*	0	0	0	0
(Robert Silbering) w/10 e-mail*	0	0	0	0
(Robert Silbering) w/10 evaluat*	0	0	0	0
(Robert Silbering) w/10 plan	0	0	0	0
(Robert Silbering) w/10 propos*	0	0	0	0
(Robert Silbering) w/10 recommend*	0	0	0	0
(Robert Silbering) w/10 request*	0	0	0	0
(Robert Silbering) w/10 respon*	0	0	0	0
(Robert Silbering) w/10 review	0	0	0	0
(Robert Silbering) w/10 said	0	0	0	0
(Robert Silbering) w/10 say*	0	0	0	0
(Robert Silbering) w/10 spoke*	0	0	0	0
(Robert Silbering) w/10 state*	0	0	0	0
(Robert Silbering) w/10 talk*	0	0	0	0
(Robert Silbering) w/10 tell	0	0	0	0
(Robert Silbering) w/10 told	0	0	0	0
(Robert Silbering) w/10 writ*	0	0	0	0
(Robert Silbering) w/10 wrote	0	0	0	0
(Sarah Schuyler) and (5 %)	0	0	0	0
(Sarah Schuyler) w/10 ask*	0	0	0	0
(Sarah Schuyler) w/10 call*	0	0	0	0
(Sarah Schuyler) w/10 demand*	0	0	0	0
(Sarah Schuyler) w/10 email*	0	0	0	0
(Sarah Schuyler) w/10 e-mail*	0	0	0	0
(Sarah Schuyler) w/10 evaluat*	0	0	0	0
(Sarah Schuyler) w/10 plan	0	0	0	0
(Sarah Schuyler) w/10 propos*	0	0	0	0
(Sarah Schuyler) w/10 report*	0	0	0	0
(Sarah Schuyler) w/10 request*	0	0	0	0
(Sarah Schuyler) w/10 respon*	0	0	0	0
(Sarah Schuyler) w/10 review	0	0	0	0
(Sarah Schuyler) w/10 said	0	0	0	0
(Sarah Schuyler) w/10 say*	0	0	0	0
(Sarah Schuyler) w/10 spoke*	0	0	0	0
(Sarah Schuyler) w/10 talk*	0	0	0	0
(Sarah Schuyler) w/10 tell	0	0	0	0
(Sarah Schuyler) w/10 told	0	0	0	0
(Sarah Schuyler) w/10 writ*	0	0	0	0
(Sarah Schuyler) w/10 wrote	0	0	0	0
(Steven Escaravage) and (5 %)	0	0	0	0
(Steven Escaravage) w/10 ask*	0	0	0	0
(Steven Escaravage) w/10 call*	0	0	0	0
(Steven Escaravage) w/10 demand*	0	0	0	0
(Steven Escaravage) w/10 email*	0	0	0	0
(Steven Escaravage) w/10 e-mail*	0	0	0	0
(Steven Escaravage) w/10 evaluat*	0	0	0	0
(Steven Escaravage) w/10 plan	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Steven Escaravage) w/10 propos*	0	0	0	0
(Steven Escaravage) w/10 recommend*	0	0	0	0
(Steven Escaravage) w/10 report*	0	0	0	0
(Steven Escaravage) w/10 request*	0	0	0	0
(Steven Escaravage) w/10 respon*	0	0	0	0
(Steven Escaravage) w/10 review	0	0	0	0
(Steven Escaravage) w/10 said	0	0	0	0
(Steven Escaravage) w/10 say*	0	0	0	0
(Steven Escaravage) w/10 spoke*	0	0	0	0
(Steven Escaravage) w/10 state*	0	0	0	0
(Steven Escaravage) w/10 tell	0	0	0	0
(Steven Escaravage) w/10 told	0	0	0	0
(Steven Escaravage) w/10 writ*	0	0	0	0
(Steven Escaravage) w/10 wrote	0	0	0	0
(Ted Greenberg) and (5 %)	0	0	0	0
(Ted Greenberg) w/10 demand*	0	0	0	0
(Ted Greenberg) w/10 e-mail*	0	0	0	0
(Ted Greenberg) w/10 evaluat*	0	0	0	0
(Ted Greenberg) w/10 say*	0	0	0	0
(Ted Greenberg) w/10 spoke*	0	0	0	0
(Ted Greenberg) w/10 talk*	0	0	0	0
(Ted Greenberg) w/10 tell	0	0	0	0
(Ted Greenberg) w/10 told	0	0	0	0
(WUmonitor@gmail com) and (5 %)	0	0	0	0
(WUmonitor@gmail com) and MIP*	0	0	0	0
(WUmonitor@gmail com) w/10 ask*	0	0	0	0
(WUmonitor@gmail com) w/10 demand*	0	0	0	0
(WUmonitor@gmail com) w/10 evaluat*	0	0	0	0
(WUmonitor@gmail com) w/10 plan	0	0	0	0
(WUmonitor@gmail com) w/10 report*	0	0	0	0
(WUmonitor@gmail com) w/10 review	0	0	0	0
(WUmonitor@gmail com) w/10 said	0	0	0	0
(WUmonitor@gmail com) w/10 say*	0	0	0	0
(WUmonitor@gmail com) w/10 spoke*	0	0	0	0
(WUmonitor@gmail com) w/10 talk*	0	0	0	0
(WUmonitor@gmail com) w/10 tell	0	0	0	0
(WUmonitor@gmail com) w/10 told	0	0	0	0
(WUmonitor@gmail com) w/10 writ*	0	0	0	0
(WUmonitor@gmail com) w/10 wrote	0	0	0	0
(WUmonitor2012@gmail com) and (5 %)	0	0	0	0
(WUmonitor2012@gmail com) and (5 per cent)	0	0	0	0
(WUmonitor2012@gmail com) and (5 percent)	0	0	0	0
(WUmonitor2012@gmail com) and (agent oversight)	0	0	0	0
(WUmonitor2012@gmail com) and (Business Solutions)	0	0	0	0
(WUmonitor2012@gmail com) and (Custom House)	0	0	0	0
(WUmonitor2012@gmail com) and (five per cent)	0	0	0	0
(WUmonitor2012@gmail com) and (five percent)	0	0	0	0
(WUmonitor2012@gmail com) and (Implementation Plan)	0	0	0	0
(WUmonitor2012@gmail com) and (know your agent)	0	0	0	0
(WUmonitor2012@gmail com) and (money order)	0	0	0	0
(WUmonitor2012@gmail com) and (Periodic Review*)	0	0	0	0
(WUmonitor2012@gmail com) and (pre-paid)	0	0	0	0
(WUmonitor2012@gmail com) and (Western Union Business Solutions)	0	0	0	0
(WUmonitor2012@gmail com) and (WU Business Solutions)	0	0	0	0
(WUmonitor2012@gmail com) and interdict*	0	0	0	0
(WUmonitor2012@gmail com) and KYA	0	0	0	0
(WUmonitor2012@gmail com) and prepaid	0	0	0	0
(WUmonitor2012@gmail com) and Recommendation*	0	0	0	0
(WUmonitor2012@gmail com) and Travelex	0	0	0	0
(WUmonitor2012@gmail com) and WUBS	0	0	0	0
(WUmonitor2012@gmail com) w/10 ask*	0	0	0	0
(WUmonitor2012@gmail com) w/10 call*	0	0	0	0
(WUmonitor2012@gmail com) w/10 demand*	0	0	0	0
(WUmonitor2012@gmail com) w/10 email*	0	0	0	0
(WUmonitor2012@gmail com) w/10 e-mail*	0	0	0	0
(WUmonitor2012@gmail com) w/10 evaluat*	0	0	0	0
(WUmonitor2012@gmail com) w/10 plan	0	0	0	0
(WUmonitor2012@gmail com) w/10 propos*	0	0	0	0
(WUmonitor2012@gmail com) w/10 recommend*	0	0	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(WUmonitor2012@gmail.com) w/10 report*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 request*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 respon*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 review	0	0	0	0
(WUmonitor2012@gmail.com) w/10 said	0	0	0	0
(WUmonitor2012@gmail.com) w/10 say*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 spoke*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 state*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 talk*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 tell	0	0	0	0
(WUmonitor2012@gmail.com) w/10 told	0	0	0	0
(WUmonitor2012@gmail.com) w/10 writ*	0	0	0	0
(WUmonitor2012@gmail.com) w/10 wrote	0	0	0	0
(Wyn Clark) and (5 %)	0	0	0	0
(Wyn Clark) w/10 ask*	0	0	0	0
(Wyn Clark) w/10 demand*	0	0	0	0
(Wyn Clark) w/10 email*	0	0	0	0
(Wyn Clark) w/10 e-mail*	0	0	0	0
(Wyn Clark) w/10 evaluat*	0	0	0	0
(Wyn Clark) w/10 propos*	0	0	0	0
(Wyn Clark) w/10 recommend*	0	0	0	0
(Wyn Clark) w/10 report*	0	0	0	0
(Wyn Clark) w/10 request*	0	0	0	0
(Wyn Clark) w/10 respon*	0	0	0	0
(Wyn Clark) w/10 review	0	0	0	0
(Wyn Clark) w/10 said	0	0	0	0
(Wyn Clark) w/10 say*	0	0	0	0
(Wyn Clark) w/10 spoke*	0	0	0	0
(Wyn Clark) w/10 state*	0	0	0	0
(Wyn Clark) w/10 talk*	0	0	0	0
(Wyn Clark) w/10 tell	0	0	0	0
(Wyn Clark) w/10 told	0	0	0	0
(Wyn Clark) w/10 writ*	0	0	0	0
(Wyn Clark) w/10 wrote	0	0	0	0
John De Wulf	0	0	0	0
Rachele Byrne	0	0	0	0
"Greenberg" and (5 per cent)	1	1	0	0
"Greenberg" and (five per cent)	1	1	0	0
"Greenberg" w/10 say*	1	0	1	0
"Greenberg" w/10 talk*	1	0	1	0
"Greenberg" w/10 wrote	1	1	0	0
"Keene" and (5 per cent)	1	1	0	0
"Keene" and (5 percent)	1	1	0	0
"Keene" and (five percent)	1	1	0	0
"Lonnie" and (5 per cent)	1	1	0	0
"Lonnie" and (WU Business Solutions)	1	1	0	0
"Monitorship" and (5 per cent)	1	1	0	0
"Monitorship" and (5 percent)	1	1	0	0
"Monitorship" and (Business Solutions)	1	1	0	0
"Monitorship" and (five per cent)	1	1	0	0
"Monitorship" and (Western Union Business Solutions)	1	1	0	0
"Monitorship" and (WU Business Solutions)	1	1	0	0
"Monitorship" and MIP*	1	1	0	0
"Monitorship" w/10 plan	1	0	0	1
"Monitorship" w/10 wrote	1	1	0	0
"SWB Monitor" and (5 per cent)	1	1	0	0
"SWB Monitor" and (five per cent)	1	1	0	0
"SWBA Monitor" and (5 per cent)	1	1	0	0
"SWBA Monitor" and (5 percent)	1	1	0	0
"SWBA Monitor" and (five per cent)	1	1	0	0
"SWBA Monitor" and (five percent)	1	1	0	0
"SWBA Monitor" and (WU Business Solutions)	1	1	0	0
"SWBA Monitor" w/10 review	1	1	0	0
"SWBA Monitor" w/10 writ*	1	1	0	0
"Ted" and (5 per cent)	1	1	0	0
"Ted" and (five per cent)	1	1	0	0
"Ted" w/10 demand*	1	0	1	0
"Ted" w/10 evaluat*	1	1	0	0
"Ted" w/10 tell	1	1	0	0

Search Term	Count	BRANDT	FARAH	PORTER
"the Monitor" and (5 per cent)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (5 per cent)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (5 percent)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (agent oversight)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (Business Solutions)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (Custom House)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (five per cent)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (five percent)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (Implementation Plan)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (know your agent)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (money order)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (Periodic Review*)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (pre-paid)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (risk assessment*)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (Western Union Business Solutions)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and (WU Business Solutions)	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and 5%	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and interdict*	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and KYA	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and prepaid	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and Recommendation*	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and Travelex	1	1	0	0
((Frederick R. Kessler) or (Frederick R Kessler) and WUBS	1	1	0	0
(*@WUmonitor com) and (five percent)	1	1	0	0
(*@WUmonitor com) and (money order)	1	1	0	0
(Dennis Lormel) and (5 per cent)	1	1	0	0
(Dennis Lormel) and (5 percent)	1	1	0	0
(Dennis Lormel) and (five per cent)	1	1	0	0
(Dennis Lormel) and (five percent)	1	1	0	0
(Dennis Lormel) and (WU Business Solutions)	1	1	0	0
(Dennis Lormel) w/10 review	1	1	0	0
(Dennis Lormel) w/10 say*	1	1	0	0
(Dennis Lormel) w/10 writ*	1	1	0	0
(Douglas Meadows) and (5 per cent)	1	1	0	0
(Douglas Meadows) and (5 percent)	1	1	0	0
(Douglas Meadows) and (agent oversight)	1	1	0	0
(Douglas Meadows) and (Business Solutions)	1	1	0	0
(Douglas Meadows) and (Custom House)	1	1	0	0
(Douglas Meadows) and (five per cent)	1	1	0	0
(Douglas Meadows) and (five percent)	1	1	0	0
(Douglas Meadows) and (Implementation Plan)	1	1	0	0
(Douglas Meadows) and (know your agent)	1	1	0	0
(Douglas Meadows) and (pre-paid)	1	1	0	0
(Douglas Meadows) and (Western Union Business Solutions)	1	1	0	0
(Douglas Meadows) and (WU Business Solutions)	1	1	0	0
(Douglas Meadows) and KYA	1	1	0	0
(Douglas Meadows) and prepaid	1	1	0	0
(Douglas Meadows) and Travelex	1	1	0	0
(Douglas Meadows) w/10 email*	1	1	0	0
(Ernest Sohn) and (5 per cent)	1	1	0	0
(Ernest Sohn) and (5 percent)	1	1	0	0
(Ernest Sohn) and (agent oversight)	1	1	0	0
(Ernest Sohn) and (Business Solutions)	1	1	0	0
(Ernest Sohn) and (Custom House)	1	1	0	0
(Ernest Sohn) and (five per cent)	1	1	0	0
(Ernest Sohn) and (five percent)	1	1	0	0
(Ernest Sohn) and (Implementation Plan)	1	1	0	0
(Ernest Sohn) and (know your agent)	1	1	0	0
(Ernest Sohn) and (money order)	1	1	0	0
(Ernest Sohn) and (Periodic Review*)	1	1	0	0
(Ernest Sohn) and (pre-paid)	1	1	0	0
(Ernest Sohn) and (Western Union Business Solutions)	1	1	0	0
(Ernest Sohn) and (WU Business Solutions)	1	1	0	0
(Ernest Sohn) and KYA	1	1	0	0
(Ernest Sohn) and prepaid	1	1	0	0
(Ernest Sohn) and Recommendation*	1	1	0	0
(Ernest Sohn) and Travelex	1	1	0	0
(Ernest Sohn) and WUBS	1	1	0	0
(Frederick R. Kessler) or (Frederick R Kessler)	1	1	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(JD Hannick) and (5 per cent)	1	1	0	0
(JD Hannick) and (5 percent)	1	1	0	0
(JD Hannick) and (agent oversight)	1	1	0	0
(JD Hannick) and (Business Solutions)	1	1	0	0
(JD Hannick) and (Custom House)	1	1	0	0
(JD Hannick) and (five per cent)	1	1	0	0
(JD Hannick) and (five percent)	1	1	0	0
(JD Hannick) and (Implementation Plan)	1	1	0	0
(JD Hannick) and (know your agent)	1	1	0	0
(JD Hannick) and (money order)	1	1	0	0
(JD Hannick) and (Periodic Review*)	1	1	0	0
(JD Hannick) and (pre-paid)	1	1	0	0
(JD Hannick) and (Western Union Business Solutions)	1	1	0	0
(JD Hannick) and (WU Business Solutions)	1	1	0	0
(JD Hannick) and interdict*	1	1	0	0
(JD Hannick) and KYA	1	1	0	0
(JD Hannick) and MIP*	1	1	0	0
(JD Hannick) and prepaid	1	1	0	0
(JD Hannick) and Recommendation*	1	1	0	0
(JD Hannick) and Travelex	1	1	0	0
(JD Hannick) and WUBS	1	1	0	0
(Jeff Hunter) and (5 per cent)	1	1	0	0
(Jeff Hunter) and (5 percent)	1	1	0	0
(Jeff Hunter) and (agent oversight)	1	1	0	0
(Jeff Hunter) and (Custom House)	1	1	0	0
(Jeff Hunter) and (five per cent)	1	1	0	0
(Jeff Hunter) and (five percent)	1	1	0	0
(Jeff Hunter) and (Implementation Plan)	1	1	0	0
(Jeff Hunter) and (know your agent)	1	1	0	0
(Jeff Hunter) and (money order)	1	1	0	0
(Jeff Hunter) and (Periodic Review*)	1	1	0	0
(Jeff Hunter) and (WU Business Solutions)	1	1	0	0
(Jeff Hunter) and interdict*	1	1	0	0
(Jeff Hunter) and KYA	1	1	0	0
(Jeff Hunter) and prepaid	1	1	0	0
(Jeff Hunter) and Recommendation*	1	1	0	0
(Jeff Hunter) and WUBS	1	1	0	0
(John Bell) and (5 per cent)	1	1	0	0
(John Bell) and (5 percent)	1	1	0	0
(John Bell) and (five per cent)	1	1	0	0
(John Bell) and (Implementation Plan)	1	1	0	0
(John Bell) and (know your agent)	1	1	0	0
(John Bell) and (Periodic Review*)	1	1	0	0
(John Bell) and (WU Business Solutions)	1	1	0	0
(John Bell) w/10 plan	1	1	0	0
(John Knapp) and (5 per cent)	1	1	0	0
(John Knapp) and (Business Solutions)	1	1	0	0
(John Knapp) and (five per cent)	1	1	0	0
(John Knapp) and (five percent)	1	1	0	0
(John Knapp) and (Western Union Business Solutions)	1	1	0	0
(John Knapp) and (WU Business Solutions)	1	1	0	0
(John Knapp) w/10 spoke*	1	0	0	1
(Lisa Dawson) and (5 per cent)	1	1	0	0
(Lisa Dawson) and (5 percent)	1	1	0	0
(Lisa Dawson) and (Business Solutions)	1	1	0	0
(Lisa Dawson) and (Custom House)	1	1	0	0
(Lisa Dawson) and (five per cent)	1	1	0	0
(Lisa Dawson) and (five percent)	1	1	0	0
(Lisa Dawson) and (know your agent)	1	1	0	0
(Lisa Dawson) and (money order)	1	1	0	0
(Lisa Dawson) and (Periodic Review*)	1	1	0	0
(Lisa Dawson) and (pre-paid)	1	1	0	0
(Lisa Dawson) and (Western Union Business Solutions)	1	1	0	0
(Lisa Dawson) and (WU Business Solutions)	1	1	0	0
(Lisa Dawson) and KYA	1	1	0	0
(Lisa Dawson) and Travelex	1	1	0	0
(Lisa Dawson) and WUBS	1	1	0	0
(Lisa Dawson) w/10 recommend*	1	1	0	0
(Lisa Dawson) w/10 request*	1	1	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Lonnie Keene) and (5 per cent)	1	1	0	0
(Lonnie Keene) and (5 percent)	1	1	0	0
(Lonnie Keene) and (five percent)	1	1	0	0
(Lonnie Keene) and (WU Business Solutions)	1	1	0	0
(Lonnie Keene) w/10 evaluat*	1	0	0	1
(Lonnie Keene) w/10 writ*	1	1	0	0
(Matt Derstine) and (5 per cent)	1	1	0	0
(Matt Derstine) and (5 percent)	1	1	0	0
(Matt Derstine) and (agent oversight)	1	1	0	0
(Matt Derstine) and (Business Solutions)	1	1	0	0
(Matt Derstine) and (Custom House)	1	1	0	0
(Matt Derstine) and (five per cent)	1	1	0	0
(Matt Derstine) and (five percent)	1	1	0	0
(Matt Derstine) and (Implementation Plan)	1	1	0	0
(Matt Derstine) and (know your agent)	1	1	0	0
(Matt Derstine) and (money order)	1	1	0	0
(Matt Derstine) and (Periodic Review*)	1	1	0	0
(Matt Derstine) and (pre-paid)	1	1	0	0
(Matt Derstine) and (risk assessment*)	1	1	0	0
(Matt Derstine) and (Western Union Business Solutions)	1	1	0	0
(Matt Derstine) and (WU Business Solutions)	1	1	0	0
(Matt Derstine) and 5%	1	1	0	0
(Matt Derstine) and interdict*	1	1	0	0
(Matt Derstine) and KYA	1	1	0	0
(Matt Derstine) and prepaid	1	1	0	0
(Matt Derstine) and Recommendation*	1	1	0	0
(Matt Derstine) and Travelex	1	1	0	0
(Matt Derstine) and WUBS	1	1	0	0
(Michael Ledley) and (5 per cent)	1	1	0	0
(Michael Ledley) and (5 percent)	1	1	0	0
(Michael Ledley) and (agent oversight)	1	1	0	0
(Michael Ledley) and (Business Solutions)	1	1	0	0
(Michael Ledley) and (Custom House)	1	1	0	0
(Michael Ledley) and (five per cent)	1	1	0	0
(Michael Ledley) and (five percent)	1	1	0	0
(Michael Ledley) and (Implementation Plan)	1	1	0	0
(Michael Ledley) and (know your agent)	1	1	0	0
(Michael Ledley) and (money order)	1	1	0	0
(Michael Ledley) and (Periodic Review*)	1	1	0	0
(Michael Ledley) and (pre-paid)	1	1	0	0
(Michael Ledley) and (risk assessment*)	1	1	0	0
(Michael Ledley) and (Western Union Business Solutions)	1	1	0	0
(Michael Ledley) and (WU Business Solutions)	1	1	0	0
(Michael Ledley) and 5%	1	1	0	0
(Michael Ledley) and interdict*	1	1	0	0
(Michael Ledley) and KYA	1	1	0	0
(Michael Ledley) and prepaid	1	1	0	0
(Michael Ledley) and Recommendation*	1	1	0	0
(Michael Ledley) and Travelex	1	1	0	0
(Michael Ledley) and WUBS	1	1	0	0
(Nick Nahas) and (5 per cent)	1	1	0	0
(Nick Nahas) and (5 percent)	1	1	0	0
(Nick Nahas) and (agent oversight)	1	1	0	0
(Nick Nahas) and (Business Solutions)	1	1	0	0
(Nick Nahas) and (Custom House)	1	1	0	0
(Nick Nahas) and (five per cent)	1	1	0	0
(Nick Nahas) and (five percent)	1	1	0	0
(Nick Nahas) and (Implementation Plan)	1	1	0	0
(Nick Nahas) and (know your agent)	1	1	0	0
(Nick Nahas) and (money order)	1	1	0	0
(Nick Nahas) and (Periodic Review*)	1	1	0	0
(Nick Nahas) and (pre-paid)	1	1	0	0
(Nick Nahas) and (risk assessment*)	1	1	0	0
(Nick Nahas) and (Western Union Business Solutions)	1	1	0	0
(Nick Nahas) and (WU Business Solutions)	1	1	0	0
(Nick Nahas) and interdict*	1	1	0	0
(Nick Nahas) and KYA	1	1	0	0
(Nick Nahas) and prepaid	1	1	0	0
(Nick Nahas) and Recommendation*	1	1	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Nick Nahas) and Travelex	1	1	0	0
(Nick Nahas) and WUBS	1	1	0	0
(Patrick Mahon) and (5 per cent)	1	1	0	0
(Patrick Mahon) and (5 percent)	1	1	0	0
(Patrick Mahon) and (agent oversight)	1	1	0	0
(Patrick Mahon) and (Business Solutions)	1	1	0	0
(Patrick Mahon) and (five per cent)	1	1	0	0
(Patrick Mahon) and (five percent)	1	1	0	0
(Patrick Mahon) and (Implementation Plan)	1	1	0	0
(Patrick Mahon) and (know your agent)	1	1	0	0
(Patrick Mahon) and (money order)	1	1	0	0
(Patrick Mahon) and (Periodic Review*)	1	1	0	0
(Patrick Mahon) and (pre-paid)	1	1	0	0
(Patrick Mahon) and (Western Union Business Solutions)	1	1	0	0
(Patrick Mahon) and (WU Business Solutions)	1	1	0	0
(Patrick Mahon) and KYA	1	1	0	0
(Patrick Mahon) and prepaid	1	1	0	0
(Patrick Mahon) and Recommendation*	1	1	0	0
(Patrick Mahon) and WUBS	1	1	0	0
(Patrick Mahon) w/10 call*	1	0	0	1
(Patrick Mahon) w/10 state*	1	0	0	1
(Paul Lewis) and (5 per cent)	1	1	0	0
(Paul Lewis) and (5 percent)	1	1	0	0
(Paul Lewis) and (five per cent)	1	1	0	0
(Paul Lewis) and (five percent)	1	1	0	0
(Paul Lewis) and (know your agent)	1	1	0	0
(Paul Lewis) and (Periodic Review*)	1	1	0	0
(Paul Lewis) and (WU Business Solutions)	1	1	0	0
(Paul Lewis) w/10 report*	1	0	1	0
(Reynold Benjamin) and (5 per cent)	1	1	0	0
(Reynold Benjamin) and (5 percent)	1	1	0	0
(Reynold Benjamin) and (agent oversight)	1	1	0	0
(Reynold Benjamin) and (Business Solutions)	1	1	0	0
(Reynold Benjamin) and (Custom House)	1	1	0	0
(Reynold Benjamin) and (five per cent)	1	1	0	0
(Reynold Benjamin) and (five percent)	1	1	0	0
(Reynold Benjamin) and (Implementation Plan)	1	1	0	0
(Reynold Benjamin) and (know your agent)	1	1	0	0
(Reynold Benjamin) and (money order)	1	1	0	0
(Reynold Benjamin) and (Periodic Review*)	1	1	0	0
(Reynold Benjamin) and (pre-paid)	1	1	0	0
(Reynold Benjamin) and (risk assessment*)	1	1	0	0
(Reynold Benjamin) and (Western Union Business Solutions)	1	1	0	0
(Reynold Benjamin) and (WU Business Solutions)	1	1	0	0
(Reynold Benjamin) and 5%	1	1	0	0
(Reynold Benjamin) and interdict*	1	1	0	0
(Reynold Benjamin) and KYA	1	1	0	0
(Reynold Benjamin) and prepaid	1	1	0	0
(Reynold Benjamin) and Recommendation*	1	1	0	0
(Reynold Benjamin) and Travelex	1	1	0	0
(Reynold Benjamin) and WUBS	1	1	0	0
(Ricki Conrey) and (5 per cent)	1	1	0	0
(Ricki Conrey) and (5 percent)	1	1	0	0
(Ricki Conrey) and (agent oversight)	1	1	0	0
(Ricki Conrey) and (Business Solutions)	1	1	0	0
(Ricki Conrey) and (Custom House)	1	1	0	0
(Ricki Conrey) and (five per cent)	1	1	0	0
(Ricki Conrey) and (five percent)	1	1	0	0
(Ricki Conrey) and (Implementation Plan)	1	1	0	0
(Ricki Conrey) and (know your agent)	1	1	0	0
(Ricki Conrey) and (money order)	1	1	0	0
(Ricki Conrey) and (Periodic Review*)	1	1	0	0
(Ricki Conrey) and (pre-paid)	1	1	0	0
(Ricki Conrey) and (Western Union Business Solutions)	1	1	0	0
(Ricki Conrey) and (WU Business Solutions)	1	1	0	0
(Ricki Conrey) and KYA	1	1	0	0
(Ricki Conrey) and prepaid	1	1	0	0
(Ricki Conrey) and Recommendation*	1	1	0	0
(Ricki Conrey) and Travelex	1	1	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Robert Silbering) and (5 per cent)	1	1	0	0
(Robert Silbering) and (5 percent)	1	1	0	0
(Robert Silbering) and (five per cent)	1	1	0	0
(Robert Silbering) and (five percent)	1	1	0	0
(Robert Silbering) and (WU Business Solutions)	1	1	0	0
(Robert Silbering) w/10 report*	1	1	0	0
(Sarah Schuyler) and (5 per cent)	1	1	0	0
(Sarah Schuyler) and (5 percent)	1	1	0	0
(Sarah Schuyler) and (Business Solutions)	1	1	0	0
(Sarah Schuyler) and (Custom House)	1	1	0	0
(Sarah Schuyler) and (five per cent)	1	1	0	0
(Sarah Schuyler) and (five percent)	1	1	0	0
(Sarah Schuyler) and (Implementation Plan)	1	1	0	0
(Sarah Schuyler) and (know your agent)	1	1	0	0
(Sarah Schuyler) and (money order)	1	1	0	0
(Sarah Schuyler) and (Periodic Review*)	1	1	0	0
(Sarah Schuyler) and (pre-paid)	1	1	0	0
(Sarah Schuyler) and (Western Union Business Solutions)	1	1	0	0
(Sarah Schuyler) and (WU Business Solutions)	1	1	0	0
(Sarah Schuyler) and KYA	1	1	0	0
(Sarah Schuyler) and WUBS	1	1	0	0
(Sarah Schuyler) w/10 recommend*	1	1	0	0
(Steven Escaravage) and (5 per cent)	1	1	0	0
(Steven Escaravage) and (5 percent)	1	1	0	0
(Steven Escaravage) and (agent oversight)	1	1	0	0
(Steven Escaravage) and (Business Solutions)	1	1	0	0
(Steven Escaravage) and (Custom House)	1	1	0	0
(Steven Escaravage) and (five per cent)	1	1	0	0
(Steven Escaravage) and (five percent)	1	1	0	0
(Steven Escaravage) and (Implementation Plan)	1	1	0	0
(Steven Escaravage) and (know your agent)	1	1	0	0
(Steven Escaravage) and (money order)	1	1	0	0
(Steven Escaravage) and (Periodic Review*)	1	1	0	0
(Steven Escaravage) and (pre-paid)	1	1	0	0
(Steven Escaravage) and (Western Union Business Solutions)	1	1	0	0
(Steven Escaravage) and (WU Business Solutions)	1	1	0	0
(Steven Escaravage) and interdict*	1	1	0	0
(Steven Escaravage) and KYA	1	1	0	0
(Steven Escaravage) and MIP*	1	1	0	0
(Steven Escaravage) and prepaid	1	1	0	0
(Steven Escaravage) and Recommendation*	1	1	0	0
(Steven Escaravage) and Travelex	1	1	0	0
(Steven Escaravage) and WUBS	1	1	0	0
(Steven Escaravage) w/10 talk*	1	1	0	0
(Ted Greenberg) and (5 per cent)	1	1	0	0
(Ted Greenberg) and (agent oversight)	1	1	0	0
(Ted Greenberg) and (five per cent)	1	1	0	0
(Ted Greenberg) and (WU Business Solutions)	1	1	0	0
(Ted Greenberg) w/10 call*	1	0	0	1
(Ted Greenberg) w/10 wrote	1	1	0	0
(WUmonitor@gmail com) and (5 per cent)	1	1	0	0
(WUmonitor@gmail com) and (agent oversight)	1	1	0	0
(WUmonitor@gmail com) and (Business Solutions)	1	1	0	0
(WUmonitor@gmail com) and (Custom House)	1	1	0	0
(WUmonitor@gmail com) and (five per cent)	1	1	0	0
(WUmonitor@gmail com) and (five percent)	1	1	0	0
(WUmonitor@gmail com) and (know your agent)	1	1	0	0
(WUmonitor@gmail com) and (Periodic Review*)	1	1	0	0
(WUmonitor@gmail com) and (pre-paid)	1	1	0	0
(WUmonitor@gmail com) and (Western Union Business Solutions)	1	1	0	0
(WUmonitor@gmail com) and (WU Business Solutions)	1	1	0	0
(WUmonitor@gmail com) and interdict*	1	1	0	0
(WUmonitor@gmail com) and prepaid	1	1	0	0
(WUmonitor@gmail com) and Travelex	1	1	0	0
(WUmonitor@gmail com) and WUBS	1	1	0	0
(WUmonitor@gmail com) w/10 e-mail*	1	1	0	0
(WUmonitor2012@gmail com) and MIP*	1	1	0	0
(Wyn Clark) and (5 per cent)	1	1	0	0
(Wyn Clark) and (5 percent)	1	1	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Wyn Clark) and (agent oversight)	1	1	0	0
(Wyn Clark) and (Business Solutions)	1	1	0	0
(Wyn Clark) and (Custom House)	1	1	0	0
(Wyn Clark) and (five per cent)	1	1	0	0
(Wyn Clark) and (five percent)	1	1	0	0
(Wyn Clark) and (Implementation Plan)	1	1	0	0
(Wyn Clark) and (know your agent)	1	1	0	0
(Wyn Clark) and (Periodic Review*)	1	1	0	0
(Wyn Clark) and (Western Union Business Solutions)	1	1	0	0
(Wyn Clark) and (WU Business Solutions)	1	1	0	0
(Wyn Clark) and prepaid	1	1	0	0
(Wyn Clark) and Travelex	1	1	0	0
Matt Derstine	1	1	0	0
Michael Ledley	1	1	0	0
Reynold Benjamin	1	1	0	0
"Keene" and (five per cent)	2	2	0	0
"Keene" w/10 say*	2	2	0	0
"Keene" w/10 talk*	2	2	0	0
"Lonnie" and (five per cent)	2	2	0	0
"Monitorship" and (Custom House)	2	2	0	0
"Monitorship" w/10 propos*	2	1	0	1
"Monitorship" w/10 recommend*	2	2	0	0
"Monitorship" w/10 review	2	2	0	0
"Monitorship" w/10 say*	2	2	0	0
"SWB Monitor" w/10 tell	2	2	0	0
"SWBA Monitor" and (Business Solutions)	2	2	0	0
"SWBA Monitor" and (Custom House)	2	2	0	0
"SWBA Monitor" and (Western Union Business Solutions)	2	2	0	0
"SWBA Monitor" and Travelex	2	2	0	0
"Ted" w/10 told	2	2	0	0
"the Monitor" w/10 e-mail*	2	2	0	0
(*@WUmonitor com) and (5 percent)	2	2	0	0
(*@WUmonitor com) w/10 state*	2	1	0	1
(Dennis Lormel) and (Business Solutions)	2	2	0	0
(Dennis Lormel) and (Western Union Business Solutions)	2	2	0	0
(Dennis Lormel) w/10 ask*	2	2	0	0
(Dennis Lormel) w/10 email*	2	2	0	0
(Douglas Meadows) and (money order)	2	2	0	0
(Douglas Meadows) and (Periodic Review*)	2	2	0	0
(Douglas Meadows) w/10 request*	2	2	0	0
(Jeff Hunter) and (risk assessment*)	2	2	0	0
(John Bell) and (five percent)	2	2	0	0
(John Bell) w/10 email*	2	2	0	0
(Lisa Dawson) and (Implementation Plan)	2	2	0	0
(Lonnie Keene) and (five per cent)	2	2	0	0
(Lonnie Keene) and (Western Union Business Solutions)	2	2	0	0
(Lonnie Keene) w/10 propos*	2	2	0	0
(Patrick Mahon) and (Custom House)	2	2	0	0
(Patrick Mahon) and (risk assessment*)	2	1	0	1
(Patrick Mahon) and interdict*	2	1	0	1
(Patrick Mahon) and Travelex	2	2	0	0
(Paul Lewis) and (Business Solutions)	2	2	0	0
(Paul Lewis) and (Western Union Business Solutions)	2	2	0	0
(Paul Lewis) w/10 review	2	2	0	0
(Robert Silbering) and (agent oversight)	2	2	0	0
(Robert Silbering) and (Business Solutions)	2	2	0	0
(Robert Silbering) and (Custom House)	2	2	0	0
(Robert Silbering) and (Implementation Plan)	2	2	0	0
(Robert Silbering) and (know your agent)	2	2	0	0
(Robert Silbering) and (money order)	2	2	0	0
(Robert Silbering) and (Periodic Review*)	2	2	0	0
(Robert Silbering) and (pre-paid)	2	2	0	0
(Robert Silbering) and (risk assessment*)	2	2	0	0
(Robert Silbering) and (Western Union Business Solutions)	2	2	0	0
(Robert Silbering) and 5%	2	2	0	0
(Robert Silbering) and interdict*	2	2	0	0
(Robert Silbering) and KYA	2	2	0	0
(Robert Silbering) and prepaid	2	2	0	0
(Robert Silbering) and Recommendation*	2	2	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Robert Silbering) and Travelex	2	2	0	0
(Robert Silbering) and WUBS	2	2	0	0
(Ted Greenberg) and (five percent)	2	2	0	0
(Ted Greenberg) and (money order)	2	2	0	0
(Ted Greenberg) w/10 email*	2	2	0	0
(Wyn Clark) w/10 plan	2	2	0	0
Robert Silbering	2	2	0	0
"Greenberg" w/10 ask*	3	3	0	0
"Greenberg" w/10 evaluat*	3	3	0	0
"Greenberg" w/10 said	3	3	0	0
"Keene" w/10 evaluat*	3	2	0	1
"Keene" w/10 writ*	3	3	0	0
"Monitorship" w/10 evaluat*	3	3	0	0
"Monitorship" w/10 request*	3	3	0	0
"Monitorship" w/10 respon*	3	0	0	3
"SWB Monitor" and (WU Business Solutions)	3	1	1	1
"SWB Monitor" w/10 spoke*	3	3	0	0
"SWBA Monitor" and WUBS	3	3	0	0
(*@WUmonitor com) w/10 plan	3	3	0	0
(Dennis Lormel) and (Implementation Plan)	3	3	0	0
(Dennis Lormel) and (Periodic Review*)	3	3	0	0
(Dennis Lormel) and Travelex	3	2	0	1
(Dennis Lormel) w/10 call*	3	3	0	0
(Dennis Lormel) w/10 said	3	3	0	0
(Douglas Meadows) and WUBS	3	3	0	0
(Douglas Meadows) w/10 call*	3	3	0	0
(Jeff Hunter) and (Business Solutions)	3	3	0	0
(Jeff Hunter) and (pre-paid)	3	3	0	0
(Jeff Hunter) and (Western Union Business Solutions)	3	3	0	0
(John Bell) and (Custom House)	3	1	0	2
(John Knapp) w/10 respon*	3	3	0	0
(John Knapp) w/10 tell	3	3	0	0
(Lisa Dawson) w/10 review	3	3	0	0
(Patrick Mahon) and 5%	3	2	0	1
(Paul Lewis) w/10 respon*	3	3	0	0
(Ricki Conrey) and WUBS	3	3	0	0
(Ted Greenberg) and (5 percent)	3	3	0	0
(Ted Greenberg) w/10 ask*	3	3	0	0
(Ted Greenberg) w/10 plan	3	3	0	0
(Ted Greenberg) w/10 said	3	3	0	0
(WUmonitor@gmail com) and (5 percent)	3	3	0	0
(WUmonitor@gmail com) and (money order)	3	3	0	0
(WUmonitor@gmail com) and KYA	3	3	0	0
(WUmonitor@gmail com) w/10 propos*	3	3	0	0
(WUmonitor@gmail com) w/10 recommend*	3	3	0	0
(WUmonitor@gmail com) w/10 state*	3	3	0	0
(WUmonitor2012@gmail com) and (risk assessment*)	3	3	0	0
(WUmonitor2012@gmail com) and 5%	3	3	0	0
(Wyn Clark) and (money order)	3	3	0	0
(Wyn Clark) w/10 call*	3	3	0	0
Patrick Mahon	3	2	0	1
"Greenberg" and (five percent)	4	2	2	0
"Greenberg" and (WU Business Solutions)	4	4	0	0
"Keene" w/10 propos*	4	4	0	0
"Monitorship" and (five percent)	4	1	0	3
"Monitorship" and (Implementation Plan)	4	4	0	0
"Monitorship" and Travelex	4	4	0	0
"Monitorship" w/10 state*	4	0	0	4
"SWBA Monitor" and MIP*	4	3	0	1
"SWBA Monitor" w/10 report*	4	4	0	0
"the Monitor" and (WU Business Solutions)	4	3	1	0
(John Bell) and (agent oversight)	4	4	0	0
(John Bell) and (Business Solutions)	4	4	0	0
(John Bell) and (money order)	4	1	0	3
(John Bell) and (Western Union Business Solutions)	4	4	0	0
(John Bell) w/10 request*	4	4	0	0
(John Bell) w/10 respon*	4	4	0	0
(John Knapp) and (Custom House)	4	4	0	0
(John Knapp) w/10 email*	4	3	0	1

Search Term	Count	BRANDT	FARAH	PORTER
(John Knapp) w/10 state*	4	0	0	4
(Lisa Dawson) and (agent oversight)	4	4	0	0
(Lisa Dawson) and interdict*	4	4	0	0
(Lonnie Keene) and (Custom House)	4	3	0	1
(Lonnie Keene) and Travelex	4	4	0	0
(Lonnie Keene) w/10 call*	4	4	0	0
(Sarah Schuyler) and (agent oversight)	4	4	0	0
(Sarah Schuyler) and (risk assessment*)	4	4	0	0
(Sarah Schuyler) and prepaid	4	4	0	0
(Ted Greenberg) and (Custom House)	4	1	0	3
(Ted Greenberg) and (Implementation Plan)	4	3	0	1
(WUmonitor@gmail com) w/10 respon*	4	4	0	0
"Greenberg" and (Implementation Plan)	5	3	1	1
"Keene" and (WU Business Solutions)	5	2	0	3
"Monitorship" and (agent oversight)	5	3	0	2
"Monitorship" and (know your agent)	5	3	0	2
"Monitorship" and (pre-paid)	5	3	0	2
"Monitorship" and prepaid	5	3	0	2
"SWB Monitor" and (5 percent)	5	5	0	0
"SWBA Monitor" and (agent oversight)	5	4	0	1
(*@WUmonitor com) and prepaid	5	5	0	0
(*@WUmonitor com) w/10 request*	5	3	0	2
(John Bell) w/10 ask*	5	5	0	0
(John Knapp) and (5 percent)	5	5	0	0
(Lisa Dawson) and prepaid	5	5	0	0
(Lisa Dawson) and Recommendation*	5	5	0	0
(Lonnie Keene) w/10 ask*	5	5	0	0
(Lonnie Keene) w/10 state*	5	5	0	0
(Nick Nahas) and 5%	5	5	0	0
(Sarah Schuyler) and interdict*	5	4	0	1
(Sarah Schuyler) and MIP*	5	5	0	0
Nick Nahas	5	5	0	0
WUmonitor2012@gmail com	5	5	0	0
"Keene" w/10 ask*	6	6	0	0
(Dennis Lormel) and (Custom House)	6	2	0	4
(Paul Lewis) and (agent oversight)	6	6	0	0
(Ted Greenberg) w/10 writ*	6	1	0	5
(WUmonitor@gmail com) w/10 call*	6	6	0	0
"Greenberg" and (5 percent)	7	3	0	4
"Lonnie" w/10 e-mail*	7	7	0	0
"Monitorship" and (money order)	7	5	0	2
(*@WUmonitor com) and (Business Solutions)	7	7	0	0
(*@WUmonitor com) and (know your agent)	7	7	0	0
(*@WUmonitor com) and (Western Union Business Solutions)	7	7	0	0
(*@WUmonitor com) w/10 email*	7	6	0	1
(*@WUmonitor com) w/10 propos*	7	1	0	6
(Dennis Lormel) and (agent oversight)	7	7	0	0
(Ernest Sohn) and MIP*	7	7	0	0
(John Knapp) and Travelex	7	7	0	0
(John Knapp) w/10 plan	7	7	0	0
(Lonnie Keene) w/10 email*	7	7	0	0
(Paul Lewis) w/10 email*	7	7	0	0
(Ted Greenberg) and (Business Solutions)	7	7	0	0
(Ted Greenberg) and (Western Union Business Solutions)	7	7	0	0
(Ted Greenberg) and Travelex	7	5	0	2
(Ted Greenberg) w/10 review	7	7	0	0
"Keene" and (Western Union Business Solutions)	8	5	3	0
"Monitor" and (5 per cent)	8	2	4	2
"Monitorship" and interdict*	8	6	0	2
"Monitorship" and KYA	8	6	0	2
"SWB Monitor" and (five percent)	8	8	0	0
(Dennis Lormel) and (know your agent)	8	8	0	0
(Dennis Lormel) w/10 request*	8	8	0	0
(Douglas Meadows) w/10 recommend*	8	8	0	0
(John Bell) w/10 recommend*	8	8	0	0
(Lonnie Keene) and (pre-paid)	8	8	0	0
(Paul Lewis) and (Custom House)	8	5	0	3
(Ted Greenberg) and (know your agent)	8	8	0	0
(Ted Greenberg) and (Periodic Review*)	8	8	0	0

Search Term	Count	BRANDT	FARAH	PORTER
(Ted Greenberg) w/10 propos*	8	7	0	1
"Greenberg" and (know your agent)	9	8	1	0
"SWBA Monitor" and (Periodic Review*)	9	5	0	4
"Ted" w/10 spoke*	9	9	0	0
(Dennis Lormel) and prepaid	9	9	0	0
(Ernest Sohn) and interdict*	9	9	0	0
(John Knapp) w/10 ask*	9	9	0	0
(Lisa Dawson) and (risk assessment*)	9	9	0	0
(Lonnie Keene) and (Business Solutions)	9	6	2	1
(Paul Lewis) and (money order)	9	3	0	6
(Paul Lewis) w/10 request*	9	9	0	0
(WUmonitor@gmail com) w/10 email*	9	9	0	0
(WUmonitor@gmail com) w/10 request*	9	9	0	0
"Monitorship" w/10 report*	10	5	0	5
"Ted" and (WU Business Solutions)	10	3	1	6
"Ted" w/10 e-mail*	10	10	0	0
(Dennis Lormel) w/10 respon*	10	5	0	5
(Dennis Lormel) w/10 state*	10	10	0	0
(Douglas Meadows) and Recommendation*	10	10	0	0
(JD Hannick) and (risk assessment*)	10	10	0	0
(Jeff Hunter) and MIP*	10	10	0	0
(Jeff Hunter) and Travelex	10	10	0	0
(John Bell) w/10 talk*	10	10	0	0
(Lonnie Keene) w/10 wrote	10	10	0	0
(Ted Greenberg) w/10 state*	10	10	0	0
(WUmonitor@gmail com) and (Implementation Plan)	10	10	0	0
"Greenberg" and (agent oversight)	11	4	7	0
"Keene" w/10 email*	11	11	0	0
"Monitorship" and (Periodic Review*)	11	3	0	8
(*@WUmonitor com) w/10 wrote	11	11	0	0
(Dennis Lormel) w/10 recommend*	11	11	0	0
(Lonnie Keene) w/10 plan	11	11	0	0
(Steven Escaravage) and (risk assessment*)	11	11	0	0
"SWBA Monitor" and (Implementation Plan)	12	8	0	4
"Ted" and (agent oversight)	12	8	1	3
(Paul Lewis) and prepaid	12	5	0	7
(Paul Lewis) w/10 recommend*	12	10	0	2
"Keene" w/10 wrote	13	13	0	0
"Monitorship" and WUBS	13	11	0	2
"SWB Monitor" w/10 talk*	13	13	0	0
"Ted" and (five percent)	13	10	3	0
(*@WUmonitor com) and (Periodic Review*)	13	13	0	0
(Paul Lewis) and (Implementation Plan)	13	13	0	0
(Ted Greenberg) w/10 respon*	13	5	0	8
(*@WUmonitor com) w/10 call*	14	13	0	1
(John Knapp) w/10 call*	14	14	0	0
(Lisa Dawson) and 5%	14	14	0	0
(Paul Lewis) w/10 call*	14	9	0	5
(Ted Greenberg) w/10 report*	14	14	0	0
(Wyn Clark) and (pre-paid)	14	8	0	6
"Greenberg" w/10 writ*	15	2	0	13
"Lonnie" w/10 demand*	15	15	0	0
"Lonnie" w/10 told	15	11	0	4
"SWBA Monitor" and (know your agent)	15	10	0	5
"SWBA Monitor" and (pre-paid)	15	10	0	5
"SWBA Monitor" and KYA	15	10	0	5
"SWBA Monitor" and prepaid	15	10	0	5
(*@WUmonitor com) w/10 report*	15	15	0	0
(Douglas Meadows) and MIP*	15	13	0	2
(Jeff Hunter) and 5%	15	15	0	0
"Greenberg" w/10 propos*	16	5	0	11
(Douglas Meadows) and interdict*	16	14	0	2
(Sarah Schuyler) and Recommendation*	16	16	0	0
"Greenberg" w/10 plan	17	13	4	0
"Greenberg" w/10 review	17	12	2	3
(*@WUmonitor com) w/10 review	17	6	0	11
(Dennis Lormel) and (money order)	17	17	0	0
(John Bell) w/10 call*	17	9	0	8
Jeff Hunter	17	17	0	0

Search Term	Count	BRANDT	FARAH	PORTER
"Greenberg" w/10 respon*	18	3	1	14
"Ted" w/10 wrote	18	15	0	3
(*@WUmonitor.com) and KYA	18	18	0	0
(Dennis Lormel) w/10 plan	18	11	0	7
(Ernest Sohn) and (risk assessment*)	18	18	0	0
(John Knapp) w/10 request*	18	17	0	1
(Lonnie Keene) w/10 request*	18	18	0	0
(Lonnie Keene) w/10 respon*	18	18	0	0
(Sarah Schuyler) w/10 state*	18	0	0	18
"Greenberg" w/10 call*	19	2	1	16
"Keene" w/10 plan	19	18	0	1
"SWBA Monitor" and (money order)	19	14	0	5
(John Knapp) w/10 propos*	19	19	0	0
(John Knapp) w/10 recommend*	19	17	0	2
(Sarah Schuyler) and Travelex	19	1	0	18
(Ted Greenberg) w/10 recommend*	19	19	0	0
"SWBA Monitor" and interdict*	20	10	0	10
"the Monitor" w/10 spoke*	20	15	0	5
Lisa Dawson	20	20	0	0
"Keene" and (Business Solutions)	21	12	5	4
"Keene" w/10 respon*	21	21	0	0
(JD Hannick) and 5%	21	21	0	0
(John Bell) w/10 review	21	19	0	2
(Lonnie Keene) and prepaid	21	20	0	1
(Lonnie Keene) and WUBS	21	21	0	0
"Keene" w/10 call*	22	21	0	1
"Keene" w/10 request*	22	22	0	0
(Lonnie Keene) w/10 review	22	22	0	0
(Ricki Conrey) and MIP*	22	20	0	2
(Steven Escaravage) and 5%	22	22	0	0
"Lonnie" w/10 tell	23	21	0	2
"the Monitor" w/10 demand*	23	23	0	0
(Dennis Lormel) and (pre-paid)	23	14	0	9
(Ted Greenberg) and prepaid	23	21	0	2
JD Hannick	23	23	0	0
"Lonnie" w/10 evaluat*	24	23	0	1
(Ricki Conrey) and interdict*	24	22	0	2
"Ted" w/10 writ*	25	16	0	9
(John Bell) and (pre-paid)	25	16	0	9
(Lonnie Keene) and (know your agent)	25	25	0	0
(Paul Lewis) and (pre-paid)	25	16	0	9
Steven Escaravage	25	25	0	0
"Lonnie" and (five percent)	26	26	0	0
(Dennis Lormel) w/10 propos*	26	18	0	8
(Lonnie Keene) w/10 report*	26	26	0	0
(Ted Greenberg) w/10 request*	26	26	0	0
"Keene" and WUBS	27	26	1	0
"SWB Monitor" w/10 email*	27	24	0	3
"Lonnie" and (Western Union Business Solutions)	28	15	3	10
"Ted" and (5 percent)	28	21	3	4
"Greenberg" w/10 request*	29	28	1	0
(Ernest Sohn) and 5%	29	29	0	0
(Ted Greenberg) and (pre-paid)	29	18	0	11
"Greenberg" w/10 recommend*	30	26	2	2
"Greenberg" w/10 report*	30	16	10	4
(Lonnie Keene) and (agent oversight)	30	30	0	0
"Greenberg" w/10 email*	31	22	0	9
"SWB Monitor" w/10 writ*	32	18	0	14
Ernest Sohn	32	32	0	0
"Ted" and (Implementation Plan)	33	26	2	5
"Ted" and (know your agent)	33	28	1	4
"Ted" w/10 email*	33	24	0	9
"the Monitor" w/10 tell	33	28	0	5
(Paul Lewis) and Travelex	33	3	0	30
(Ricki Conrey) and (risk assessment*)	33	31	0	2
"SWB Monitor" and (Periodic Review*)	34	29	1	4
"Ted" and (Periodic Review*)	34	27	1	6
"Keene" and (pre-paid)	35	28	6	1
"Lonnie" and (Business Solutions)	35	19	5	11

Search Term	Count	BRANDT	FARAH	PORTER
"the Monitor" and (5 percent)	35	35	0	0
(Douglas Meadows) and (risk assessment*)	35	33	0	2
(WUmonitor@gmail com) and (risk assessment*)	35	35	0	0
"SWBA Monitor" and (risk assessment*)	36	31	0	5
"SWBA Monitor" and Recommendation*	36	31	0	5
(Douglas Meadows) and 5%	37	35	0	2
(Sarah Schuyler) and 5%	37	18	0	19
"SWB Monitor" and (Western Union Business Solutions)	38	30	2	6
(John Bell) and prepaid	38	9	0	29
(John Knapp) w/10 review	38	36	0	2
(Paul Lewis) w/10 state*	38	0	0	38
"Monitorship" and Recommendation*	39	30	0	9
"the Monitor" w/10 wrote	39	30	0	9
"Ted" w/10 say*	40	17	8	15
"the Monitor" and (five per cent)	40	40	0	0
(John Bell) and Travelex	40	12	0	28
(WUmonitor@gmail com) and Recommendation*	40	40	0	0
"Monitorship" and (risk assessment*)	41	32	0	9
"Monitorship" and 5%	41	25	0	16
"SWB Monitor" w/10 call*	41	32	0	9
"SWBA Monitor" and 5%	41	31	0	10
"SWBA Monitor"	42	32	0	10
(Lonnie Keene) and (Implementation Plan)	42	42	0	0
(Wyn Clark) and MIP*	42	26	0	16
(Wyn Clark) and Recommendation*	42	28	0	14
(Lonnie Keene) and (Periodic Review*)	43	43	0	0
"Keene" w/10 report*	44	38	6	0
"SWB Monitor" w/10 ask*	44	38	0	6
Sarah Schuyler	44	25	0	19
"Monitor" w/10 wrote	45	36	0	9
"SWB Monitor" w/10 said	45	3	0	42
(WUmonitor@gmail com) and 5%	45	45	0	0
"Keene" w/10 review	46	39	6	1
"SWB Monitor" and (Business Solutions)	46	34	4	8
(Ricki Conrey) and 5%	46	44	0	2
"Greenberg" and (Periodic Review*)	47	42	1	4
"Monitor" w/10 tell	47	39	0	8
(*@WUmonitor com) w/10 respon*	47	44	0	3
(Wyn Clark) and KYA	47	27	0	20
"Keene" and (agent oversight)	48	42	6	0
"Lonnie" and (5 percent)	48	48	0	0
Ricki Conrey	48	46	0	2
"Keene" and (know your agent)	49	42	6	1
"Monitor" w/10 demand*	49	35	9	5
(Wyn Clark) and (risk assessment*)	49	29	0	20
(Wyn Clark) and WUBS	49	29	0	20
"Lonnie" w/10 spoke*	50	50	0	0
(John Knapp) and (Periodic Review*)	50	40	0	10
"Ted" w/10 propos*	51	24	0	27
"the Monitor" w/10 say*	51	50	0	1
(John Knapp) w/10 report*	51	41	0	10
"Lonnie" w/10 writ*	52	44	0	8
"Greenberg" and (money order)	54	24	9	21
(Wyn Clark) and interdict*	54	29	0	25
"Ted" w/10 respon*	57	38	0	19
(Wyn Clark) and 5%	57	35	0	22
"Ted" w/10 plan	58	55	1	2
"Lonnie" w/10 wrote	59	59	0	0
"SWB Monitor" and (know your agent)	59	50	1	8
"SWB Monitor" w/10 propos*	60	47	0	13
"Ted" w/10 said	60	41	0	19
Douglas Meadows	60	58	0	2
"Keene" and (Custom House)	61	11	0	50
"Monitorship"	62	43	0	19
(John Knapp) and (agent oversight)	62	46	0	16
(John Knapp) and (know your agent)	62	46	0	16
(John Bell) w/10 state*	63	10	0	53
(Paul Lewis) and MIP*	63	37	0	26
(John Bell) and KYA	64	40	0	24

Search Term	Count	BRANDT	FARAH	PORTER
"SWB Monitor" w/10 plan	65	44	0	21
(*@WUmonitor com) and interdict*	65	33	0	32
(Lonnie Keene) and KYA	65	65	0	0
"Monitor" and (five per cent)	67	40	27	0
(John Knapp) and (Implementation Plan)	67	51	0	16
Wyn Clark	67	41	0	26
"Keene" and (Implementation Plan)	68	61	6	1
"Keene" and (Periodic Review*)	68	61	6	1
"Lonnie" and (Custom House)	68	19	0	49
"Ted" and (pre-paid)	69	41	1	27
"Greenberg" and (pre-paid)	70	54	0	16
(John Knapp) and prepaid	70	50	0	20
"Lonnie" w/10 said	71	60	0	11
"Monitor" w/10 spoke*	71	61	1	9
(Paul Lewis) and KYA	72	45	0	27
"Lonnie" w/10 propos*	73	63	0	10
"SWB Monitor" w/10 respon*	73	64	3	6
(*@WUmonitor com) and WUBS	73	71	0	2
"Greenberg" and (Western Union Business Solutions)	74	16	13	45
"Ted" and (Western Union Business Solutions)	75	58	3	14
(Lonnie Keene) and (money order)	76	75	0	1
"SWB Monitor" and Travelex	78	66	5	7
"Lonnie" and (know your agent)	79	64	6	9
"SWB Monitor" and (Custom House)	79	76	1	2
(*@WUmonitor com) and MIP*	79	78	0	1
"Ted" w/10 report*	80	47	1	32
(Dennis Lormel) and MIP*	80	60	0	20
(Dennis Lormel) and KYA	82	58	0	24
(Ted Greenberg) and KYA	82	58	0	24
(Ted Greenberg) and MIP*	82	64	0	18
"Ted" and (money order)	83	30	1	52
(Paul Lewis) and WUBS	83	61	0	22
"Lonnie" and (agent oversight)	84	78	6	0
"Lonnie" w/10 say*	84	82	0	2
"SWB Monitor" and (agent oversight)	84	81	1	2
(Dennis Lormel) and WUBS	85	54	0	31
(John Knapp) and (pre-paid)	85	60	0	25
"Ted" w/10 recommend*	86	75	0	11
(John Bell) and MIP*	86	66	0	20
"Greenberg" and (Business Solutions)	88	25	18	45
"Ted" w/10 review	89	63	0	26
(Lonnie Keene) and MIP*	90	88	0	2
"Ted" w/10 call*	91	52	1	38
(John Knapp) and (money order)	94	75	0	19
"Keene" and KYA	97	84	6	7
"Ted" and (Business Solutions)	97	73	3	21
"Ted" and (Custom House)	97	20	1	76
"Ted" w/10 talk*	97	74	0	23
"Ted" w/10 ask*	103	77	0	26
"Greenberg" and KYA	104	71	1	32
"Keene" and prepaid	106	68	7	31
(Paul Lewis) and (risk assessment*)	108	82	0	26
(John Bell) and WUBS	109	84	0	25
"the Monitor" w/10 said	110	65	0	45
WUmonitor@gmail com	112	112	0	0
"Monitor" and (5 percent)	113	72	36	5
"the Monitor" w/10 email*	113	93	8	12
(Paul Lewis) and Recommendation*	113	95	0	18
"Greenberg" and Travelex	114	21	10	83
"Greenberg" w/10 state*	114	18	0	96
"SWB Monitor" and (pre-paid)	114	92	3	19
(Ted Greenberg) and WUBS	114	82	0	32
"the Monitor" and (five percent)	115	106	6	3
"Ted" and KYA	117	73	1	43
(John Bell) and Recommendation*	118	98	0	20
"Keene" and MIP*	119	105	0	14
"Lonnie" and (Periodic Review*)	119	98	6	15
(John Knapp) and WUBS	120	82	0	38
"Greenberg" and MIP*	121	97	0	24

Search Term	Count	BRANDT	FARAH	PORTER
(Ted Greenberg) and interdict*	121	78	0	43
"Lonnie" and (pre-paid)	122	101	6	15
"SWB Monitor" and (Implementation Plan)	124	111	7	6
"SWB Monitor" w/10 state*	124	97	5	22
"Keene" and Travelex	126	44	3	79
"Monitor" w/10 e-mail*	126	12	95	19
(Paul Lewis) and interdict*	127	94	0	33
(John Knapp) and KYA	128	86	0	42
"Monitor" w/10 say*	130	116	2	12
(Dennis Lormel) and Recommendation*	130	100	0	30
"Lonnie" w/10 talk*	131	108	0	23
"SWB Monitor" w/10 report*	131	103	0	28
"Lonnie" w/10 email*	133	123	6	4
(John Knapp) and Recommendation*	134	103	0	31
"Keene" w/10 state*	135	43	2	90
(John Knapp) and MIP*	138	101	0	37
"Monitor" and (five percent)	140	117	16	7
(John Bell) and (risk assessment*)	140	103	0	37
"Greenberg" and prepaid	141	93	15	33
"Keene" and (money order)	141	101	6	34
"Lonnie" and KYA	141	118	6	17
(John Bell) and interdict*	143	95	0	48
(*@WUmonitor com) and Recommendation*	144	141	0	3
"Monitor" and (WU Business Solutions)	145	9	11	125
(Dennis Lormel) and interdict*	145	91	0	54
"Lonnie" and Travelex	146	83	3	60
"Lonnie" w/10 call*	146	124	0	22
"the Monitor" w/10 told	147	83	1	63
"Greenberg" and WUBS	151	105	12	34
"SWB Monitor" w/10 review	156	136	0	20
(Lonnie Keene) and interdict*	156	139	0	17
(Ted Greenberg) and Recommendation*	156	133	0	23
"Greenberg" and (Custom House)	158	16	10	132
"SWB Monitor" and (money order)	158	139	9	10
"Monitor" w/10 told	163	93	1	69
"the Monitor" w/10 talk*	170	141	0	29
"Lonnie" w/10 respon*	173	166	0	7
(John Knapp) and interdict*	173	125	0	48
"Lonnie" and WUBS	177	158	0	19
"Lonnie" w/10 report*	177	174	0	3
(Lonnie Keene) w/10 recommend*	179	179	0	0
"the Monitor" w/10 writ*	180	164	6	10
"Keene" w/10 recommend*	181	180	0	1
"the Monitor" and (Western Union Business Solutions)	187	151	14	22
"SWB Monitor" and KYA	191	145	5	41
"the Monitor" and (Custom House)	195	148	8	39
(John Knapp) and (risk assessment*)	196	155	0	41
(Ted Greenberg) and 5%	197	156	0	41
"Lonnie" and (Implementation Plan)	199	183	6	10
(Paul Lewis) and 5%	199	130	0	69
(Dennis Lormel) and 5%	200	146	0	54
"Ted" w/10 request*	202	157	0	45
"Lonnie" and (money order)	208	163	6	39
"Ted" w/10 state*	213	44	5	164
(*@WUmonitor com) and (risk assessment*)	213	209	0	4
"the Monitor" and (Business Solutions)	214	163	22	29
"Monitor" w/10 talk*	217	178	0	39
"SWB Monitor" and MIP*	220	181	1	38
(Dennis Lormel) and (risk assessment*)	221	182	0	39
"Monitor" w/10 said	225	124	12	89
"SWB Monitor" and prepaid	227	199	13	15
(Ted Greenberg) and (risk assessment*)	227	200	0	27
"Lonnie" w/10 plan	228	199	0	29
"Greenberg" and Recommendation*	229	177	13	39
"SWB Monitor" w/10 request*	235	166	1	68
"Lonnie" w/10 ask*	239	230	0	9
"Keene" and interdict*	255	180	6	69
"Lonnie" w/10 state*	259	166	0	93
(John Knapp) and 5%	263	213	0	50

Search Term	Count	BRANDT	FARAH	PORTER
"SWB Monitor" and WUBS	264	200	7	57
"Ted" and prepaid	267	177	13	77
(John Bell) and 5%	273	169	0	104
"Lonnie" and MIP*	276	249	0	27
"Lonnie" and prepaid	282	222	6	54
"Ted" and Travelex	282	158	6	118
"Ted" and MIP*	296	229	1	66
(Lonnie Keene) and (risk assessment*)	317	311	0	6
(*@WUmonitor com) and 5%	318	292	0	26
"the Monitor" and Travelex	322	265	18	39
(Lonnie Keene) and 5%	325	313	2	10
"the Monitor" w/10 evaluat*	339	273	1	65
Paul Lewis	341	266	1	74
"Monitor" w/10 writ*	345	281	12	52
"Greenberg" and (risk assessment*)	346	296	2	48
"Lonnie" w/10 request*	352	301	0	51
"the Monitor" and (know your agent)	353	295	8	50
"Keene" and (risk assessment*)	359	345	6	8
(Lonnie Keene) and Recommendation*	362	355	4	3
"Greenberg" and interdict*	366	127	0	239
John Knapp	366	314	0	52
"Lonnie" w/10 review	367	358	0	9
"Ted" and WUBS	371	283	5	83
Ted Greenberg	376	320	0	56
Dennis Lormel	380	306	0	74
John Bell	391	287	0	104
"the Monitor" and (agent oversight)	393	338	17	38
"Lonnie" w/10 recommend*	399	380	0	19
"Keene" and Recommendation*	404	390	10	4
"Ted" and interdict*	408	178	1	229
"the Monitor" w/10 call*	414	337	7	70
"the Monitor" w/10 ask*	417	327	5	85
"SWB Monitor" w/10 recommend*	421	385	3	33
"the Monitor" and (Periodic Review*)	429	356	8	65
"Monitor" w/10 email*	438	264	86	88
"Ted" and Recommendation*	475	373	8	94
"the Monitor" w/10 respon*	486	412	0	74
"the Monitor" and (pre-paid)	557	473	10	74
"Ted" and (risk assessment*)	565	468	6	91
"Keene" and 5%	582	416	11	155
"the Monitor" and KYA	586	503	10	73
"Monitor" and (Custom House)	597	401	64	132
"Monitor" and (Western Union Business Solutions)	598	373	128	97
"the Monitor" and (Implementation Plan)	632	588	7	37
"the Monitor" w/10 propos*	633	493	6	134
"Monitor" and (know your agent)	654	530	14	110
"the Monitor" and MIP*	665	569	1	95
"Monitor" and (Periodic Review*)	684	565	16	103
"Greenberg" and 5%	686	307	36	343
"Lonnie" and interdict*	696	431	6	259
"Monitor" w/10 ask*	701	507	16	178
"the Monitor" w/10 report*	713	553	11	149
"the Monitor" and (money order)	741	653	28	60
Lonnie Keene	742	705	4	33
*@WUmonitor com	749	680	0	69
"Monitor" w/10 evaluat*	754	552	32	170
"SWB Monitor" and interdict*	796	472	9	315
"Monitor" and (agent oversight)	810	656	28	126
"the Monitor" w/10 plan	864	760	6	98
"Monitor" and (Business Solutions)	871	425	193	253
"Monitor" and (pre-paid)	882	696	55	131
"Monitor" and Travelex	891	503	112	276
"Monitor" and (Implementation Plan)	894	785	25	84
"Monitor" and MIP*	896	758	1	137
"SWB Monitor" and Recommendation*	957	827	6	124
"the Monitor" and prepaid	965	751	117	97
"the Monitor" and WUBS	991	753	87	151
"Monitor" and KYA	1028	841	24	163
"Greenberg"	1030	510	66	454

Search Term	Count	BRANDT	FARAH	PORTER
"Monitor" w/10 propos*	1032	789	14	229
"Keene"	1046	850	14	182
"the Monitor" w/10 state*	1072	941	14	117
"the Monitor" w/10 request*	1102	890	11	201
"SWB Monitor" and (risk assessment*)	1113	1007	9	97
"Monitor" w/10 call*	1201	846	29	326
"Monitor" w/10 respon*	1247	932	48	267
"Lonnie" and Recommendation*	1265	1185	10	70
"SWB Monitor" and 5%	1368	1105	21	242
"Monitor" w/10 plan	1372	1127	48	197
"Ted" and 5%	1408	882	45	481
"Monitor" and (money order)	1449	1151	97	201
"the Monitor" w/10 review	1534	1335	13	186
"the Monitor" w/10 recommend*	1781	1599	19	163
"Lonnie" and 5%	1815	1556	8	251
"Monitor" and WUBS	1940	1252	235	453
"Lonnie" and (risk assessment*)	1946	1890	6	50
"Monitor" w/10 request*	1957	1605	25	327
"Ted"	2019	1338	102	579
"Monitor" w/10 report*	2355	1736	76	543
"the Monitor" and interdict*	2394	1392	87	915
"Monitor" w/10 state*	2557	1740	65	752
"SWB Monitor"	2613	2159	25	429
"Monitor" and prepaid	2906	1535	523	848
"Monitor" w/10 review	2927	2346	85	496
"Monitor" w/10 recommend*	3015	2583	56	376
"the Monitor" and Recommendation*	3601	3050	111	440
"the Monitor" and (risk assessment*)	3760	3439	11	310
"Lonnie"	4223	3790	10	423
"the Monitor" and 5%	4472	3640	130	702
"Monitor" and interdict*	5214	2963	111	2140
"Monitor" and Recommendation*	6430	5241	290	899
"Monitor" and (risk assessment*)	6990	6263	78	649
"the Monitor"	7920	6530	136	1254
"Monitor" and 5%	11311	7797	1094	2420
"Monitor"	19842	13840	1377	4625
Entire Set	23537	16575	1524	5438

Search Term	Count
"Greenberg" and (5 %)	0
"Greenberg" w/10 demand*	0
"Greenberg" w/10 e-mail*	0
"Greenberg" w/10 say*	0
"Greenberg" w/10 spoke*	0
"Greenberg" w/10 talk*	0
"Greenberg" w/10 tell	0
"Greenberg" w/10 told	0
"Keene" and (5 %)	0
"Keene" w/10 demand*	0
"Keene" w/10 e-mail*	0
"Keene" w/10 said	0
"Keene" w/10 spoke*	0
"Keene" w/10 tell	0
"Keene" w/10 told	0
"Lonnie" and (5 %)	0
"Monitor" and (5 %)	0
"Monitorship" and (5 %)	0
"Monitorship" w/10 ask*	0
"Monitorship" w/10 call*	0
"Monitorship" w/10 demand*	0
"Monitorship" w/10 email*	0
"Monitorship" w/10 e-mail*	0
"Monitorship" w/10 plan	0
"Monitorship" w/10 respon*	0
"Monitorship" w/10 said	0
"Monitorship" w/10 spoke*	0
"Monitorship" w/10 state*	0
"Monitorship" w/10 talk*	0
"Monitorship" w/10 tell	0
"Monitorship" w/10 told	0
"Monitorship" w/10 writ*	0
"SWB Monitor" and (5 %)	0
"SWB Monitor" w/10 demand*	0
"SWB Monitor" w/10 e-mail*	0
"SWB Monitor" w/10 evaluat*	0
"SWB Monitor" w/10 say*	0
"SWB Monitor" w/10 told	0
"SWB Monitor" w/10 wrote	0
"SWBA Monitor" and (5 %)	0
"SWBA Monitor" w/10 ask*	0
"SWBA Monitor" w/10 call*	0
"SWBA Monitor" w/10 demand*	0
"SWBA Monitor" w/10 email*	0
"SWBA Monitor" w/10 e-mail*	0
"SWBA Monitor" w/10 evaluat*	0
"SWBA Monitor" w/10 plan	0
"SWBA Monitor" w/10 propos*	0
"SWBA Monitor" w/10 recommend*	0
"SWBA Monitor" w/10 request*	0
"SWBA Monitor" w/10 respon*	0
"SWBA Monitor" w/10 said	0
"SWBA Monitor" w/10 say*	0
"SWBA Monitor" w/10 spoke*	0
"SWBA Monitor" w/10 state*	0
"SWBA Monitor" w/10 talk*	0
"SWBA Monitor" w/10 tell	0
"SWBA Monitor" w/10 told	0
"SWBA Monitor" w/10 wrote	0
"Ted" and (5 %)	0
"Ted" w/10 demand*	0
"the Monitor" and (5 %)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 %)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and MIP*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 ask*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 call*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 demand*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 email*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 e-mail*	0

Search Term	Count
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 evaluat*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 plan	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 propos*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 recommend*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 report*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 request*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 respon*	0
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((Frederick R. Kessler) or (Frederick R Kessler)) w/10 talk*	0
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((Frederick R. Kessler) or (Frederick R Kessler)) w/10 writ*	0
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(*@WUmonitor com) and (5 per cent)	0
(*@WUmonitor com) and (agent oversight)	0
(*@WUmonitor com) and (Custom House)	0
(*@WUmonitor com) and (five per cent)	0
(*@WUmonitor com) and (Implementation Plan)	0
(*@WUmonitor com) and (pre-paid)	0
(*@WUmonitor com) and (WU Business Solutions)	0
(*@WUmonitor com) and Travelex	0
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(*@WUmonitor com) w/10 e-mail*	0
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(Ernest Sohn) w/10 talk*	0
(Ernest Sohn) w/10 tell	0
(Ernest Sohn) w/10 told	0
(Ernest Sohn) w/10 writ*	0
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(John De Wulf) and (agent oversight)	0
(John De Wulf) and (Business Solutions)	0
(John De Wulf) and (Custom House)	0
(John De Wulf) and (five per cent)	0
(John De Wulf) and (five percent)	0
(John De Wulf) and (Implementation Plan)	0
(John De Wulf) and (know your agent)	0
(John De Wulf) and (money order)	0
(John De Wulf) and (Periodic Review*)	0
(John De Wulf) and (pre-paid)	0
(John De Wulf) and (risk assessment*)	0
(John De Wulf) and (Western Union Business Solutions)	0
(John De Wulf) and (WU Business Solutions)	0
(John De Wulf) and 5%	0
(John De Wulf) and interdict*	0
(John De Wulf) and KYA	0
(John De Wulf) and MIP*	0
(John De Wulf) and prepaid	0
(John De Wulf) and Recommendation*	0
(John De Wulf) and Travelex	0
(John De Wulf) and WUBS	0
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Search Term	Count
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(Lisa Dawson) w/10 plan	0
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(Lisa Dawson) w/10 report*	0
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(Lonnie Keene) w/10 told	0
(Matt Derstine) and (5 %)	0
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Search Term	Count
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(Rachele Byrne) and (5 per cent)	0
(Rachele Byrne) and (5 percent)	0
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(Rachele Byrne) and (Business Solutions)	0
(Rachele Byrne) and (Custom House)	0
(Rachele Byrne) and (five per cent)	0
(Rachele Byrne) and (five percent)	0
(Rachele Byrne) and (Implementation Plan)	0
(Rachele Byrne) and (know your agent)	0
(Rachele Byrne) and (money order)	0
(Rachele Byrne) and (Periodic Review*)	0
(Rachele Byrne) and (pre-paid)	0
(Rachele Byrne) and (risk assessment*)	0
(Rachele Byrne) and (Western Union Business Solutions)	0
(Rachele Byrne) and (WU Business Solutions)	0
(Rachele Byrne) and 5%	0
(Rachele Byrne) and interdict*	0
(Rachele Byrne) and KYA	0
(Rachele Byrne) and MIP*	0
(Rachele Byrne) and prepaid	0
(Rachele Byrne) and Recommendation*	0
(Rachele Byrne) and Travelex	0
(Rachele Byrne) and WUBS	0
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(Sarah Schuyler) w/10 respon*	0
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(Sarah Schuyler) w/10 said	0
(Sarah Schuyler) w/10 say*	0
(Sarah Schuyler) w/10 spoke*	0

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(WUmonitor@gmail com) and (5 %)	0
(WUmonitor@gmail com) and MIP*	0
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(WUmonitor@gmail com) w/10 told	0
(WUmonitor@gmail com) w/10 writ*	0
(WUmonitor@gmail com) w/10 wrote	0
(WUmonitor2012@gmail com) and (5 %)	0
(WUmonitor2012@gmail com) and (5 per cent)	0
(WUmonitor2012@gmail com) and (5 percent)	0
(WUmonitor2012@gmail com) and (agent oversight)	0
(WUmonitor2012@gmail com) and (Business Solutions)	0
(WUmonitor2012@gmail com) and (Custom House)	0
(WUmonitor2012@gmail com) and (five per cent)	0
(WUmonitor2012@gmail com) and (five percent)	0
(WUmonitor2012@gmail com) and (Implementation Plan)	0
(WUmonitor2012@gmail com) and (know your agent)	0
(WUmonitor2012@gmail com) and (money order)	0
(WUmonitor2012@gmail com) and (Periodic Review*)	0
(WUmonitor2012@gmail com) and (pre-paid)	0
(WUmonitor2012@gmail com) and (Western Union Business Solutions)	0
(WUmonitor2012@gmail com) and (WU Business Solutions)	0

Search Term	Count
(WUmonitor2012@gmail.com) and interdict*	0
(WUmonitor2012@gmail.com) and KYA	0
(WUmonitor2012@gmail.com) and prepaid	0
(WUmonitor2012@gmail.com) and Recommendation*	0
(WUmonitor2012@gmail.com) and Travelex	0
(WUmonitor2012@gmail.com) and WUUBS	0
(WUmonitor2012@gmail.com) w/10 ask*	0
(WUmonitor2012@gmail.com) w/10 call*	0
(WUmonitor2012@gmail.com) w/10 demand*	0
(WUmonitor2012@gmail.com) w/10 email*	0
(WUmonitor2012@gmail.com) w/10 e-mail*	0
(WUmonitor2012@gmail.com) w/10 evaluat*	0
(WUmonitor2012@gmail.com) w/10 plan	0
(WUmonitor2012@gmail.com) w/10 propos*	0
(WUmonitor2012@gmail.com) w/10 recommend*	0
(WUmonitor2012@gmail.com) w/10 report*	0
(WUmonitor2012@gmail.com) w/10 request*	0
(WUmonitor2012@gmail.com) w/10 respon*	0
(WUmonitor2012@gmail.com) w/10 review	0
(WUmonitor2012@gmail.com) w/10 said	0
(WUmonitor2012@gmail.com) w/10 say*	0
(WUmonitor2012@gmail.com) w/10 spoke*	0
(WUmonitor2012@gmail.com) w/10 state*	0
(WUmonitor2012@gmail.com) w/10 talk*	0
(WUmonitor2012@gmail.com) w/10 tell	0
(WUmonitor2012@gmail.com) w/10 told	0
(WUmonitor2012@gmail.com) w/10 writ*	0
(WUmonitor2012@gmail.com) w/10 wrote	0
(Wyn Clark) and (5 %)	0
(Wyn Clark) w/10 ask*	0
(Wyn Clark) w/10 demand*	0
(Wyn Clark) w/10 email*	0
(Wyn Clark) w/10 e-mail*	0
(Wyn Clark) w/10 evaluat*	0
(Wyn Clark) w/10 propos*	0
(Wyn Clark) w/10 recommend*	0
(Wyn Clark) w/10 report*	0
(Wyn Clark) w/10 request*	0
(Wyn Clark) w/10 respon*	0
(Wyn Clark) w/10 review	0
(Wyn Clark) w/10 said	0
(Wyn Clark) w/10 say*	0
(Wyn Clark) w/10 spoke*	0
(Wyn Clark) w/10 state*	0
(Wyn Clark) w/10 talk*	0
(Wyn Clark) w/10 tell	0
(Wyn Clark) w/10 told	0
(Wyn Clark) w/10 writ*	0
(Wyn Clark) w/10 wrote	0
John De Wulf	0
Rachele Byrne	0
"Greenberg" and (5 per cent)	1
"Greenberg" and (five per cent)	1
"Greenberg" w/10 wrote	1
"Keene" and (5 per cent)	1
"Keene" and (5 percent)	1
"Keene" and (five percent)	1
"Lonnie" and (5 per cent)	1
"Lonnie" and (WU Business Solutions)	1
"Monitorship" and (5 per cent)	1
"Monitorship" and (5 percent)	1
"Monitorship" and (Business Solutions)	1
"Monitorship" and (five per cent)	1
"Monitorship" and (five percent)	1
"Monitorship" and (Western Union Business Solutions)	1
"Monitorship" and (WU Business Solutions)	1
"Monitorship" and MIP*	1
"Monitorship" w/10 propos*	1
"Monitorship" w/10 wrote	1

Search Term	Count
"SWB Monitor" and (5 per cent)	1
"SWB Monitor" and (five per cent)	1
"SWB Monitor" and (WU Business Solutions)	1
"SWBA Monitor" and (5 per cent)	1
"SWBA Monitor" and (5 percent)	1
"SWBA Monitor" and (five per cent)	1
"SWBA Monitor" and (five percent)	1
"SWBA Monitor" and (WU Business Solutions)	1
"SWBA Monitor" w/10 review	1
"SWBA Monitor" w/10 writ*	1
"Ted" and (5 per cent)	1
"Ted" and (five per cent)	1
"Ted" w/10 evaluat*	1
"Ted" w/10 tell	1
"the Monitor" and (5 per cent)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 per cent)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 percent)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (agent oversight)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (Business Solutions)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (Custom House)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (five per cent)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (five percent)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (Implementation Plan)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (know your agent)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (money order)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (Periodic Review*)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (pre-paid)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (risk assessment*)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (Western Union Business Solutions)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and (WU Business Solutions)	1
((Frederick R. Kessler) or (Frederick R Kessler)) and 5%	1
((Frederick R. Kessler) or (Frederick R Kessler)) and interdict*	1
((Frederick R. Kessler) or (Frederick R Kessler)) and KYA	1
((Frederick R. Kessler) or (Frederick R Kessler)) and prepaid	1
((Frederick R. Kessler) or (Frederick R Kessler)) and Recommendation*	1
((Frederick R. Kessler) or (Frederick R Kessler)) and Travelex	1
((Frederick R. Kessler) or (Frederick R Kessler)) and WUBS	1
(*@WUmonitor com) and (five percent)	1
(*@WUmonitor com) and (money order)	1
(*@WUmonitor com) w/10 propos*	1
(*@WUmonitor com) w/10 state*	1
(Dennis Lormel) and (5 per cent)	1
(Dennis Lormel) and (5 percent)	1
(Dennis Lormel) and (five per cent)	1
(Dennis Lormel) and (five percent)	1
(Dennis Lormel) and (WU Business Solutions)	1
(Dennis Lormel) w/10 review	1
(Dennis Lormel) w/10 say*	1
(Dennis Lormel) w/10 writ*	1
(Douglas Meadows) and (5 per cent)	1
(Douglas Meadows) and (5 percent)	1
(Douglas Meadows) and (agent oversight)	1
(Douglas Meadows) and (Business Solutions)	1
(Douglas Meadows) and (Custom House)	1
(Douglas Meadows) and (five per cent)	1
(Douglas Meadows) and (five percent)	1
(Douglas Meadows) and (Implementation Plan)	1
(Douglas Meadows) and (know your agent)	1
(Douglas Meadows) and (pre-paid)	1
(Douglas Meadows) and (Western Union Business Solutions)	1
(Douglas Meadows) and (WU Business Solutions)	1
(Douglas Meadows) and KYA	1
(Douglas Meadows) and prepaid	1
(Douglas Meadows) and Travelex	1
(Douglas Meadows) w/10 email*	1
(Ernest Sohn) and (5 per cent)	1
(Ernest Sohn) and (5 percent)	1
(Ernest Sohn) and (agent oversight)	1
(Ernest Sohn) and (Business Solutions)	1

Search Term	Count
(Ernest Sohn) and (Custom House)	1
(Ernest Sohn) and (five per cent)	1
(Ernest Sohn) and (five percent)	1
(Ernest Sohn) and (Implementation Plan)	1
(Ernest Sohn) and (know your agent)	1
(Ernest Sohn) and (money order)	1
(Ernest Sohn) and (Periodic Review*)	1
(Ernest Sohn) and (pre-paid)	1
(Ernest Sohn) and (Western Union Business Solutions)	1
(Ernest Sohn) and (WU Business Solutions)	1
(Ernest Sohn) and KYA	1
(Ernest Sohn) and prepaid	1
(Ernest Sohn) and Recommendation*	1
(Ernest Sohn) and Travelex	1
(Ernest Sohn) and WUBS	1
(Frederick R. Kessler) or (Frederick R Kessler)	1
(JD Hannick) and (5 per cent)	1
(JD Hannick) and (5 percent)	1
(JD Hannick) and (agent oversight)	1
(JD Hannick) and (Business Solutions)	1
(JD Hannick) and (Custom House)	1
(JD Hannick) and (five per cent)	1
(JD Hannick) and (five percent)	1
(JD Hannick) and (Implementation Plan)	1
(JD Hannick) and (know your agent)	1
(JD Hannick) and (money order)	1
(JD Hannick) and (Periodic Review*)	1
(JD Hannick) and (pre-paid)	1
(JD Hannick) and (Western Union Business Solutions)	1
(JD Hannick) and (WU Business Solutions)	1
(JD Hannick) and interdict*	1
(JD Hannick) and KYA	1
(JD Hannick) and MIP*	1
(JD Hannick) and prepaid	1
(JD Hannick) and Recommendation*	1
(JD Hannick) and Travelex	1
(JD Hannick) and WUBS	1
(Jeff Hunter) and (5 per cent)	1
(Jeff Hunter) and (5 percent)	1
(Jeff Hunter) and (agent oversight)	1
(Jeff Hunter) and (Custom House)	1
(Jeff Hunter) and (five per cent)	1
(Jeff Hunter) and (five percent)	1
(Jeff Hunter) and (Implementation Plan)	1
(Jeff Hunter) and (know your agent)	1
(Jeff Hunter) and (money order)	1
(Jeff Hunter) and (Periodic Review*)	1
(Jeff Hunter) and (WU Business Solutions)	1
(Jeff Hunter) and interdict*	1
(Jeff Hunter) and KYA	1
(Jeff Hunter) and prepaid	1
(Jeff Hunter) and Recommendation*	1
(Jeff Hunter) and WUBS	1
(John Bell) and (5 per cent)	1
(John Bell) and (5 percent)	1
(John Bell) and (Custom House)	1
(John Bell) and (five per cent)	1
(John Bell) and (Implementation Plan)	1
(John Bell) and (know your agent)	1
(John Bell) and (money order)	1
(John Bell) and (Periodic Review*)	1
(John Bell) and (WU Business Solutions)	1
(John Bell) w/10 plan	1
(John Knapp) and (5 per cent)	1
(John Knapp) and (Business Solutions)	1
(John Knapp) and (five per cent)	1
(John Knapp) and (five percent)	1
(John Knapp) and (Western Union Business Solutions)	1
(John Knapp) and (WU Business Solutions)	1

Search Term	Count
(Lisa Dawson) and (5 per cent)	1
(Lisa Dawson) and (5 percent)	1
(Lisa Dawson) and (Business Solutions)	1
(Lisa Dawson) and (Custom House)	1
(Lisa Dawson) and (five per cent)	1
(Lisa Dawson) and (five percent)	1
(Lisa Dawson) and (know your agent)	1
(Lisa Dawson) and (money order)	1
(Lisa Dawson) and (Periodic Review*)	1
(Lisa Dawson) and (pre-paid)	1
(Lisa Dawson) and (Western Union Business Solutions)	1
(Lisa Dawson) and (WU Business Solutions)	1
(Lisa Dawson) and KYA	1
(Lisa Dawson) and Travelex	1
(Lisa Dawson) and WUBS	1
(Lisa Dawson) w/10 recommend*	1
(Lisa Dawson) w/10 request*	1
(Lonnie Keene) and (5 per cent)	1
(Lonnie Keene) and (5 percent)	1
(Lonnie Keene) and (five percent)	1
(Lonnie Keene) and (WU Business Solutions)	1
(Lonnie Keene) w/10 writ*	1
(Matt Derstine) and (5 per cent)	1
(Matt Derstine) and (5 percent)	1
(Matt Derstine) and (agent oversight)	1
(Matt Derstine) and (Business Solutions)	1
(Matt Derstine) and (Custom House)	1
(Matt Derstine) and (five per cent)	1
(Matt Derstine) and (five percent)	1
(Matt Derstine) and (Implementation Plan)	1
(Matt Derstine) and (know your agent)	1
(Matt Derstine) and (money order)	1
(Matt Derstine) and (Periodic Review*)	1
(Matt Derstine) and (pre-paid)	1
(Matt Derstine) and (risk assessment*)	1
(Matt Derstine) and (Western Union Business Solutions)	1
(Matt Derstine) and (WU Business Solutions)	1
(Matt Derstine) and 5%	1
(Matt Derstine) and interdict*	1
(Matt Derstine) and KYA	1
(Matt Derstine) and prepaid	1
(Matt Derstine) and Recommendation*	1
(Matt Derstine) and Travelex	1
(Matt Derstine) and WUBS	1
(Michael Ledley) and (5 per cent)	1
(Michael Ledley) and (5 percent)	1
(Michael Ledley) and (agent oversight)	1
(Michael Ledley) and (Business Solutions)	1
(Michael Ledley) and (Custom House)	1
(Michael Ledley) and (five per cent)	1
(Michael Ledley) and (five percent)	1
(Michael Ledley) and (Implementation Plan)	1
(Michael Ledley) and (know your agent)	1
(Michael Ledley) and (money order)	1
(Michael Ledley) and (Periodic Review*)	1
(Michael Ledley) and (pre-paid)	1
(Michael Ledley) and (risk assessment*)	1
(Michael Ledley) and (Western Union Business Solutions)	1
(Michael Ledley) and (WU Business Solutions)	1
(Michael Ledley) and 5%	1
(Michael Ledley) and interdict*	1
(Michael Ledley) and KYA	1
(Michael Ledley) and prepaid	1
(Michael Ledley) and Recommendation*	1
(Michael Ledley) and Travelex	1
(Michael Ledley) and WUBS	1
(Nick Nahas) and (5 per cent)	1
(Nick Nahas) and (5 percent)	1
(Nick Nahas) and (agent oversight)	1

Search Term	Count
(Nick Nahas) and (Business Solutions)	1
(Nick Nahas) and (Custom House)	1
(Nick Nahas) and (five per cent)	1
(Nick Nahas) and (five percent)	1
(Nick Nahas) and (Implementation Plan)	1
(Nick Nahas) and (know your agent)	1
(Nick Nahas) and (money order)	1
(Nick Nahas) and (Periodic Review*)	1
(Nick Nahas) and (pre-paid)	1
(Nick Nahas) and (risk assessment*)	1
(Nick Nahas) and (Western Union Business Solutions)	1
(Nick Nahas) and (WU Business Solutions)	1
(Nick Nahas) and interdict*	1
(Nick Nahas) and KYA	1
(Nick Nahas) and prepaid	1
(Nick Nahas) and Recommendation*	1
(Nick Nahas) and Travelex	1
(Nick Nahas) and WUBS	1
(Patrick Mahon) and (5 per cent)	1
(Patrick Mahon) and (5 percent)	1
(Patrick Mahon) and (agent oversight)	1
(Patrick Mahon) and (Business Solutions)	1
(Patrick Mahon) and (five per cent)	1
(Patrick Mahon) and (five percent)	1
(Patrick Mahon) and (Implementation Plan)	1
(Patrick Mahon) and (know your agent)	1
(Patrick Mahon) and (money order)	1
(Patrick Mahon) and (Periodic Review*)	1
(Patrick Mahon) and (pre-paid)	1
(Patrick Mahon) and (risk assessment*)	1
(Patrick Mahon) and (Western Union Business Solutions)	1
(Patrick Mahon) and (WU Business Solutions)	1
(Patrick Mahon) and interdict*	1
(Patrick Mahon) and KYA	1
(Patrick Mahon) and prepaid	1
(Patrick Mahon) and Recommendation*	1
(Patrick Mahon) and WUBS	1
(Paul Lewis) and (5 per cent)	1
(Paul Lewis) and (5 percent)	1
(Paul Lewis) and (five per cent)	1
(Paul Lewis) and (five percent)	1
(Paul Lewis) and (know your agent)	1
(Paul Lewis) and (Periodic Review*)	1
(Paul Lewis) and (WU Business Solutions)	1
(Reynold Benjamin) and (5 per cent)	1
(Reynold Benjamin) and (5 percent)	1
(Reynold Benjamin) and (agent oversight)	1
(Reynold Benjamin) and (Business Solutions)	1
(Reynold Benjamin) and (Custom House)	1
(Reynold Benjamin) and (five per cent)	1
(Reynold Benjamin) and (five percent)	1
(Reynold Benjamin) and (Implementation Plan)	1
(Reynold Benjamin) and (know your agent)	1
(Reynold Benjamin) and (money order)	1
(Reynold Benjamin) and (Periodic Review*)	1
(Reynold Benjamin) and (pre-paid)	1
(Reynold Benjamin) and (risk assessment*)	1
(Reynold Benjamin) and (Western Union Business Solutions)	1
(Reynold Benjamin) and (WU Business Solutions)	1
(Reynold Benjamin) and 5%	1
(Reynold Benjamin) and interdict*	1
(Reynold Benjamin) and KYA	1
(Reynold Benjamin) and prepaid	1
(Reynold Benjamin) and Recommendation*	1
(Reynold Benjamin) and Travelex	1
(Reynold Benjamin) and WUBS	1
(Ricki Conrey) and (5 per cent)	1
(Ricki Conrey) and (5 percent)	1
(Ricki Conrey) and (agent oversight)	1

Search Term	Count
(Ricki Conrey) and (Business Solutions)	1
(Ricki Conrey) and (Custom House)	1
(Ricki Conrey) and (five per cent)	1
(Ricki Conrey) and (five percent)	1
(Ricki Conrey) and (Implementation Plan)	1
(Ricki Conrey) and (know your agent)	1
(Ricki Conrey) and (money order)	1
(Ricki Conrey) and (Periodic Review*)	1
(Ricki Conrey) and (pre-paid)	1
(Ricki Conrey) and (Western Union Business Solutions)	1
(Ricki Conrey) and (WU Business Solutions)	1
(Ricki Conrey) and KYA	1
(Ricki Conrey) and prepaid	1
(Ricki Conrey) and Recommendation*	1
(Ricki Conrey) and Travelex	1
(Robert Silbering) and (5 per cent)	1
(Robert Silbering) and (5 percent)	1
(Robert Silbering) and (five per cent)	1
(Robert Silbering) and (five percent)	1
(Robert Silbering) and (WU Business Solutions)	1
(Robert Silbering) w/10 report*	1
(Sarah Schuyler) and (5 per cent)	1
(Sarah Schuyler) and (5 percent)	1
(Sarah Schuyler) and (Business Solutions)	1
(Sarah Schuyler) and (Custom House)	1
(Sarah Schuyler) and (five per cent)	1
(Sarah Schuyler) and (five percent)	1
(Sarah Schuyler) and (Implementation Plan)	1
(Sarah Schuyler) and (know your agent)	1
(Sarah Schuyler) and (money order)	1
(Sarah Schuyler) and (Periodic Review*)	1
(Sarah Schuyler) and (pre-paid)	1
(Sarah Schuyler) and (Western Union Business Solutions)	1
(Sarah Schuyler) and (WU Business Solutions)	1
(Sarah Schuyler) and KYA	1
(Sarah Schuyler) and Travelex	1
(Sarah Schuyler) and WUBS	1
(Sarah Schuyler) w/10 recommend*	1
(Steven Escaravage) and (5 per cent)	1
(Steven Escaravage) and (5 percent)	1
(Steven Escaravage) and (agent oversight)	1
(Steven Escaravage) and (Business Solutions)	1
(Steven Escaravage) and (Custom House)	1
(Steven Escaravage) and (five per cent)	1
(Steven Escaravage) and (five percent)	1
(Steven Escaravage) and (Implementation Plan)	1
(Steven Escaravage) and (know your agent)	1
(Steven Escaravage) and (money order)	1
(Steven Escaravage) and (Periodic Review*)	1
(Steven Escaravage) and (pre-paid)	1
(Steven Escaravage) and (Western Union Business Solutions)	1
(Steven Escaravage) and (WU Business Solutions)	1
(Steven Escaravage) and interdict*	1
(Steven Escaravage) and KYA	1
(Steven Escaravage) and MIP*	1
(Steven Escaravage) and prepaid	1
(Steven Escaravage) and Recommendation*	1
(Steven Escaravage) and Travelex	1
(Steven Escaravage) and WUBS	1
(Steven Escaravage) w/10 talk*	1
(Ted Greenberg) and (5 per cent)	1
(Ted Greenberg) and (agent oversight)	1
(Ted Greenberg) and (Custom House)	1
(Ted Greenberg) and (five per cent)	1
(Ted Greenberg) and (WU Business Solutions)	1
(Ted Greenberg) w/10 writ*	1
(Ted Greenberg) w/10 wrote	1
(WUmonitor@gmail.com) and (5 per cent)	1
(WUmonitor@gmail.com) and (agent oversight)	1

Search Term	Count
(WUmonitor@gmail com) and (Business Solutions)	1
(WUmonitor@gmail com) and (Custom House)	1
(WUmonitor@gmail com) and (five per cent)	1
(WUmonitor@gmail com) and (five percent)	1
(WUmonitor@gmail com) and (know your agent)	1
(WUmonitor@gmail com) and (Periodic Review*)	1
(WUmonitor@gmail com) and (pre-paid)	1
(WUmonitor@gmail com) and (Western Union Business Solutions)	1
(WUmonitor@gmail com) and (WU Business Solutions)	1
(WUmonitor@gmail com) and interdict*	1
(WUmonitor@gmail com) and prepaid	1
(WUmonitor@gmail com) and Travelex	1
(WUmonitor@gmail com) and WUBS	1
(WUmonitor@gmail com) w/10 e-mail*	1
(WUmonitor2012@gmail com) and MIP*	1
(Wyn Clark) and (5 per cent)	1
(Wyn Clark) and (5 percent)	1
(Wyn Clark) and (agent oversight)	1
(Wyn Clark) and (Business Solutions)	1
(Wyn Clark) and (Custom House)	1
(Wyn Clark) and (five per cent)	1
(Wyn Clark) and (five percent)	1
(Wyn Clark) and (Implementation Plan)	1
(Wyn Clark) and (know your agent)	1
(Wyn Clark) and (Periodic Review*)	1
(Wyn Clark) and (Western Union Business Solutions)	1
(Wyn Clark) and (WU Business Solutions)	1
(Wyn Clark) and prepaid	1
(Wyn Clark) and Travelex	1
Matt Derstine	1
Michael Ledley	1
Reynold Benjamin	1
"Greenberg" and (five percent)	2
"Greenberg" w/10 call*	2
"Greenberg" w/10 writ*	2
"Keene" and (five per cent)	2
"Keene" and (WU Business Solutions)	2
"Keene" w/10 evaluat*	2
"Keene" w/10 say*	2
"Keene" w/10 talk*	2
"Lonnie" and (five per cent)	2
"Monitor" and (5 per cent)	2
"Monitorship" and (Custom House)	2
"Monitorship" w/10 recommend*	2
"Monitorship" w/10 review	2
"Monitorship" w/10 say*	2
"SWB Monitor" w/10 tell	2
"SWBA Monitor" and (Business Solutions)	2
"SWBA Monitor" and (Custom House)	2
"SWBA Monitor" and (Western Union Business Solutions)	2
"SWBA Monitor" and Travelex	2
"Ted" w/10 told	2
"the Monitor" w/10 e-mail*	2
(*@WUmonitor com) and (5 percent)	2
(Dennis Lormel) and (Business Solutions)	2
(Dennis Lormel) and (Custom House)	2
(Dennis Lormel) and (Western Union Business Solutions)	2
(Dennis Lormel) and Travelex	2
(Dennis Lormel) w/10 ask*	2
(Dennis Lormel) w/10 email*	2
(Douglas Meadows) and (money order)	2
(Douglas Meadows) and (Periodic Review*)	2
(Douglas Meadows) w/10 request*	2
(Jeff Hunter) and (risk assessment*)	2
(John Bell) and (five percent)	2
(John Bell) w/10 email*	2
(Lisa Dawson) and (Implementation Plan)	2
(Lonnie Keene) and (five per cent)	2
(Lonnie Keene) and (Western Union Business Solutions)	2

Search Term	Count
(Lonnie Keene) w/10 propos*	2
(Patrick Mahon) and (Custom House)	2
(Patrick Mahon) and 5%	2
(Patrick Mahon) and Travelex	2
(Paul Lewis) and (Business Solutions)	2
(Paul Lewis) and (Western Union Business Solutions)	2
(Paul Lewis) w/10 review	2
(Robert Silbering) and (agent oversight)	2
(Robert Silbering) and (Business Solutions)	2
(Robert Silbering) and (Custom House)	2
(Robert Silbering) and (Implementation Plan)	2
(Robert Silbering) and (know your agent)	2
(Robert Silbering) and (money order)	2
(Robert Silbering) and (Periodic Review*)	2
(Robert Silbering) and (pre-paid)	2
(Robert Silbering) and (risk assessment*)	2
(Robert Silbering) and (Western Union Business Solutions)	2
(Robert Silbering) and 5%	2
(Robert Silbering) and interdict*	2
(Robert Silbering) and KYA	2
(Robert Silbering) and prepaid	2
(Robert Silbering) and Recommendation*	2
(Robert Silbering) and Travelex	2
(Robert Silbering) and WUBS	2
(Ted Greenberg) and (five percent)	2
(Ted Greenberg) and (money order)	2
(Ted Greenberg) w/10 email*	2
(Wyn Clark) w/10 plan	2
Patrick Mahon	2
Robert Silbering	2
"Greenberg" and (5 percent)	3
"Greenberg" and (Implementation Plan)	3
"Greenberg" w/10 ask*	3
"Greenberg" w/10 evaluat*	3
"Greenberg" w/10 respon*	3
"Greenberg" w/10 said	3
"Keene" w/10 writ*	3
"Monitorship" and (agent oversight)	3
"Monitorship" and (know your agent)	3
"Monitorship" and (Periodic Review*)	3
"Monitorship" and (pre-paid)	3
"Monitorship" and prepaid	3
"Monitorship" w/10 evaluat*	3
"Monitorship" w/10 request*	3
"SWB Monitor" w/10 said	3
"SWB Monitor" w/10 spoke*	3
"SWBA Monitor" and MIP*	3
"SWBA Monitor" and WUBS	3
"Ted" and (WU Business Solutions)	3
"the Monitor" and (WU Business Solutions)	3
(*@WUmonitor com) w/10 plan	3
(*@WUmonitor com) w/10 request*	3
(Dennis Lormel) and (Implementation Plan)	3
(Dennis Lormel) and (Periodic Review*)	3
(Dennis Lormel) w/10 call*	3
(Dennis Lormel) w/10 said	3
(Douglas Meadows) and WUBS	3
(Douglas Meadows) w/10 call*	3
(Jeff Hunter) and (Business Solutions)	3
(Jeff Hunter) and (pre-paid)	3
(Jeff Hunter) and (Western Union Business Solutions)	3
(John Knapp) w/10 email*	3
(John Knapp) w/10 respon*	3
(John Knapp) w/10 tell	3
(Lisa Dawson) w/10 review	3
(Lonnie Keene) and (Custom House)	3
(Paul Lewis) and (money order)	3
(Paul Lewis) and Travelex	3
(Paul Lewis) w/10 respon*	3

Search Term	Count
(Ricki Conrey) and WUBS	3
(Ted Greenberg) and (5 percent)	3
(Ted Greenberg) and (Implementation Plan)	3
(Ted Greenberg) w/10 ask*	3
(Ted Greenberg) w/10 plan	3
(Ted Greenberg) w/10 said	3
(WUmonitor@gmail com) and (5 percent)	3
(WUmonitor@gmail com) and (money order)	3
(WUmonitor@gmail com) and KYA	3
(WUmonitor@gmail com) w/10 propos*	3
(WUmonitor@gmail com) w/10 recommend*	3
(WUmonitor@gmail com) w/10 state*	3
(WUmonitor2012@gmail com) and (risk assessment*)	3
(WUmonitor2012@gmail com) and 5%	3
(Wyn Clark) and (money order)	3
(Wyn Clark) w/10 call*	3
"Greenberg" and (agent oversight)	4
"Greenberg" and (WU Business Solutions)	4
"Keene" w/10 propos*	4
"Monitorship" and (Implementation Plan)	4
"Monitorship" and Travelex	4
"SWBA Monitor" and (agent oversight)	4
"SWBA Monitor" w/10 report*	4
(John Bell) and (agent oversight)	4
(John Bell) and (Business Solutions)	4
(John Bell) and (Western Union Business Solutions)	4
(John Bell) w/10 request*	4
(John Bell) w/10 respon*	4
(John Knapp) and (Custom House)	4
(Lisa Dawson) and (agent oversight)	4
(Lisa Dawson) and interdict*	4
(Lonnie Keene) and Travelex	4
(Lonnie Keene) w/10 call*	4
(Sarah Schuyler) and (agent oversight)	4
(Sarah Schuyler) and (risk assessment*)	4
(Sarah Schuyler) and interdict*	4
(Sarah Schuyler) and prepaid	4
(WUmonitor@gmail com) w/10 respon*	4
"Greenberg" w/10 propos*	5
"Keene" and (Western Union Business Solutions)	5
"Monitorship" and (money order)	5
"Monitorship" w/10 report*	5
"SWB Monitor" and (5 percent)	5
"SWBA Monitor" and (Periodic Review*)	5
(*@WUmonitor com) and prepaid	5
(Dennis Lormel) w/10 respon*	5
(John Bell) w/10 ask*	5
(John Knapp) and (5 percent)	5
(Lisa Dawson) and prepaid	5
(Lisa Dawson) and Recommendation*	5
(Lonnie Keene) w/10 ask*	5
(Lonnie Keene) w/10 state*	5
(Nick Nahas) and 5%	5
(Paul Lewis) and (Custom House)	5
(Paul Lewis) and prepaid	5
(Sarah Schuyler) and MIP*	5
(Ted Greenberg) and Travelex	5
(Ted Greenberg) w/10 respon*	5
Nick Nahas	5
WUmonitor2012@gmail com	5
"Keene" w/10 ask*	6
"Monitorship" and interdict*	6
"Monitorship" and KYA	6
(*@WUmonitor com) w/10 email*	6
(*@WUmonitor com) w/10 review	6
(Lonnie Keene) and (Business Solutions)	6
(Paul Lewis) and (agent oversight)	6
(WUmonitor@gmail com) w/10 call*	6
"Lonnie" w/10 e-mail*	7

Search Term	Count
(*@WUmonitor com) and (Business Solutions)	7
(*@WUmonitor com) and (know your agent)	7
(*@WUmonitor com) and (Western Union Business Solutions)	7
(Dennis Lormel) and (agent oversight)	7
(Ernest Sohn) and MIP*	7
(John Knapp) and Travelex	7
(John Knapp) w/10 plan	7
(Lonnie Keene) w/10 email*	7
(Paul Lewis) w/10 email*	7
(Ted Greenberg) and (Business Solutions)	7
(Ted Greenberg) and (Western Union Business Solutions)	7
(Ted Greenberg) w/10 propos*	7
(Ted Greenberg) w/10 review	7
"Greenberg" and (know your agent)	8
"SWB Monitor" and (five percent)	8
"SWBA Monitor" and (Implementation Plan)	8
"Ted" and (agent oversight)	8
(Dennis Lormel) and (know your agent)	8
(Dennis Lormel) w/10 request*	8
(Douglas Meadows) w/10 recommend*	8
(John Bell) w/10 recommend*	8
(Lonnie Keene) and (pre-paid)	8
(Ted Greenberg) and (know your agent)	8
(Ted Greenberg) and (Periodic Review*)	8
(Wyn Clark) and (pre-paid)	8
"Monitor" and (WU Business Solutions)	9
"Ted" w/10 spoke*	9
(Dennis Lormel) and prepaid	9
(Ernest Sohn) and interdict*	9
(John Bell) and prepaid	9
(John Bell) w/10 call*	9
(John Knapp) w/10 ask*	9
(Lisa Dawson) and (risk assessment*)	9
(Paul Lewis) w/10 call*	9
(Paul Lewis) w/10 request*	9
(WUmonitor@gmail com) w/10 email*	9
(WUmonitor@gmail com) w/10 request*	9
"SWBA Monitor" and (know your agent)	10
"SWBA Monitor" and (pre-paid)	10
"SWBA Monitor" and interdict*	10
"SWBA Monitor" and KYA	10
"SWBA Monitor" and prepaid	10
"Ted" and (five percent)	10
"Ted" w/10 e-mail*	10
(Dennis Lormel) w/10 state*	10
(Douglas Meadows) and Recommendation*	10
(JD Hannick) and (risk assessment*)	10
(Jeff Hunter) and MIP*	10
(Jeff Hunter) and Travelex	10
(John Bell) w/10 state*	10
(John Bell) w/10 talk*	10
(Lonnie Keene) w/10 wrote	10
(Paul Lewis) w/10 recommend*	10
(Ted Greenberg) w/10 state*	10
(WUmonitor@gmail com) and (Implementation Plan)	10
"Keene" and (Custom House)	11
"Keene" w/10 email*	11
"Lonnie" w/10 told	11
"Monitorship" and WUBS	11
(*@WUmonitor com) w/10 wrote	11
(Dennis Lormel) w/10 plan	11
(Dennis Lormel) w/10 recommend*	11
(Lonnie Keene) w/10 plan	11
(Steven Escaravage) and (risk assessment*)	11
"Greenberg" w/10 review	12
"Keene" and (Business Solutions)	12
"Monitor" w/10 e-mail*	12
(John Bell) and Travelex	12
"Greenberg" w/10 plan	13

Search Term	Count
"Keene" w/10 wrote	13
"SWB Monitor" w/10 talk*	13
(*@WUmonitor com) and (Periodic Review*)	13
(*@WUmonitor com) w/10 call*	13
(Douglas Meadows) and MIP*	13
(Paul Lewis) and (Implementation Plan)	13
"SWBA Monitor" and (money order)	14
(Dennis Lormel) and (pre-paid)	14
(Douglas Meadows) and interdict*	14
(John Knapp) w/10 call*	14
(Lisa Dawson) and 5%	14
(Ted Greenberg) w/10 report*	14
"Lonnie" and (Western Union Business Solutions)	15
"Lonnie" w/10 demand*	15
"Ted" w/10 wrote	15
"the Monitor" w/10 spoke*	15
(*@WUmonitor com) w/10 report*	15
(Jeff Hunter) and 5%	15
"Greenberg" and (Custom House)	16
"Greenberg" and (Western Union Business Solutions)	16
"Greenberg" w/10 report*	16
"Ted" w/10 writ*	16
(John Bell) and (pre-paid)	16
(Paul Lewis) and (pre-paid)	16
(Sarah Schuyler) and Recommendation*	16
"Ted" w/10 say*	17
(Dennis Lormel) and (money order)	17
(John Knapp) w/10 recommend*	17
(John Knapp) w/10 request*	17
Jeff Hunter	17
"Greenberg" w/10 state*	18
"Keene" w/10 plan	18
"SWB Monitor" w/10 writ*	18
(*@WUmonitor com) and KYA	18
(Dennis Lormel) w/10 propos*	18
(Ernest Sohn) and (risk assessment*)	18
(Lonnie Keene) w/10 request*	18
(Lonnie Keene) w/10 respon*	18
(Sarah Schuyler) and 5%	18
(Ted Greenberg) and (pre-paid)	18
"Lonnie" and (Business Solutions)	19
"Lonnie" and (Custom House)	19
(John Bell) w/10 review	19
(John Knapp) w/10 propos*	19
(Ted Greenberg) w/10 recommend*	19
"Ted" and (Custom House)	20
(Lonnie Keene) and prepaid	20
(Ricki Conrey) and MIP*	20
Lisa Dawson	20
"Greenberg" and Travelex	21
"Keene" w/10 call*	21
"Keene" w/10 respon*	21
"Lonnie" w/10 tell	21
"Ted" and (5 percent)	21
(JD Hannick) and 5%	21
(Lonnie Keene) and WUBS	21
(Ted Greenberg) and prepaid	21
"Greenberg" w/10 email*	22
"Keene" w/10 request*	22
(Lonnie Keene) w/10 review	22
(Ricki Conrey) and interdict*	22
(Steven Escaravage) and 5%	22
"Lonnie" w/10 evaluat*	23
"the Monitor" w/10 demand*	23
JD Hannick	23
"Greenberg" and (money order)	24
"SWB Monitor" w/10 email*	24
"Ted" w/10 email*	24
"Ted" w/10 propos*	24

Search Term	Count
"Greenberg" and (Business Solutions)	25
"Monitorship" and 5%	25
(Lonnie Keene) and (know your agent)	25
Sarah Schuyler	25
Steven Escaravage	25
"Greenberg" w/10 recommend*	26
"Keene" and WUBS	26
"Lonnie" and (five percent)	26
"Ted" and (Implementation Plan)	26
(Lonnie Keene) w/10 report*	26
(Ted Greenberg) w/10 request*	26
(Wyn Clark) and MIP*	26
"Ted" and (Periodic Review*)	27
(Wyn Clark) and KYA	27
"Greenberg" w/10 request*	28
"Keene" and (pre-paid)	28
"Ted" and (know your agent)	28
"the Monitor" w/10 tell	28
(Wyn Clark) and Recommendation*	28
"SWB Monitor" and (Periodic Review*)	29
(Ernest Sohn) and 5%	29
(Wyn Clark) and (risk assessment*)	29
(Wyn Clark) and interdict*	29
(Wyn Clark) and WUBS	29
"Monitorship" and Recommendation*	30
"SWB Monitor" and (Western Union Business Solutions)	30
"Ted" and (money order)	30
"the Monitor" w/10 wrote	30
(Lonnie Keene) and (agent oversight)	30
"SWBA Monitor" and (risk assessment*)	31
"SWBA Monitor" and 5%	31
"SWBA Monitor" and Recommendation*	31
(Ricki Conrey) and (risk assessment*)	31
"Monitorship" and (risk assessment*)	32
"SWB Monitor" w/10 call*	32
"SWBA Monitor"	32
Ernest Sohn	32
(*@WUmonitor.com) and interdict*	33
(Douglas Meadows) and (risk assessment*)	33
"SWB Monitor" and (Business Solutions)	34
"Monitor" w/10 demand*	35
"the Monitor" and (5 percent)	35
(Douglas Meadows) and 5%	35
(WUmonitor@gmail.com) and (risk assessment*)	35
(Wyn Clark) and 5%	35
"Monitor" w/10 wrote	36
(John Knapp) w/10 review	36
(Paul Lewis) and MIP*	37
"Keene" w/10 report*	38
"SWB Monitor" w/10 ask*	38
"Ted" w/10 respon*	38
"Keene" w/10 review	39
"Monitor" w/10 tell	39
"Monitor" and (five per cent)	40
"the Monitor" and (five per cent)	40
(John Bell) and KYA	40
(John Knapp) and (Periodic Review*)	40
(WUmonitor@gmail.com) and Recommendation*	40
"Ted" and (pre-paid)	41
"Ted" w/10 said	41
(John Knapp) w/10 report*	41
Wyn Clark	41
"Greenberg" and (Periodic Review*)	42
"Keene" and (agent oversight)	42
"Keene" and (know your agent)	42
(Lonnie Keene) and (Implementation Plan)	42
"Keene" w/10 state*	43
"Monitorship"	43
(Lonnie Keene) and (Periodic Review*)	43

Search Term	Count
"Keene" and Travelex	44
"Lonnie" w/10 writ*	44
"SWB Monitor" w/10 plan	44
"Ted" w/10 state*	44
(*@WUmonitor.com) w/10 respon*	44
(Ricki Conrey) and 5%	44
(Paul Lewis) and KYA	45
(WUmonitor@gmail.com) and 5%	45
(John Knapp) and (agent oversight)	46
(John Knapp) and (know your agent)	46
Ricki Conrey	46
"SWB Monitor" w/10 propos*	47
"Ted" w/10 report*	47
"Lonnie" and (5 percent)	48
"Lonnie" w/10 spoke*	50
"SWB Monitor" and (know your agent)	50
"the Monitor" w/10 say*	50
(John Knapp) and prepaid	50
(John Knapp) and (Implementation Plan)	51
"Ted" w/10 call*	52
"Greenberg" and (pre-paid)	54
(Dennis Lormel) and WUBS	54
"Ted" w/10 plan	55
"Ted" and (Western Union Business Solutions)	58
(Dennis Lormel) and KYA	58
(Ted Greenberg) and KYA	58
Douglas Meadows	58
"Lonnie" w/10 wrote	59
"Lonnie" w/10 said	60
(Dennis Lormel) and MIP*	60
(John Knapp) and (pre-paid)	60
"Keene" and (Implementation Plan)	61
"Keene" and (Periodic Review*)	61
"Monitor" w/10 spoke*	61
(Paul Lewis) and WUBS	61
"Lonnie" w/10 propos*	63
"Ted" w/10 review	63
"Lonnie" and (know your agent)	64
"SWB Monitor" w/10 respon*	64
(Ted Greenberg) and MIP*	64
"the Monitor" w/10 said	65
(Lonnie Keene) and KYA	65
"SWB Monitor" and Travelex	66
(John Bell) and MIP*	66
"Keene" and prepaid	68
"Greenberg" and KYA	71
(*@WUmonitor.com) and WUBS	71
"Monitor" and (5 percent)	72
"Ted" and (Business Solutions)	73
"Ted" and KYA	73
"Ted" w/10 talk*	74
"Ted" w/10 recommend*	75
(John Knapp) and (money order)	75
(Lonnie Keene) and (money order)	75
"SWB Monitor" and (Custom House)	76
"Ted" w/10 ask*	77
"Lonnie" and (agent oversight)	78
(*@WUmonitor.com) and MIP*	78
(Ted Greenberg) and interdict*	78
"SWB Monitor" and (agent oversight)	81
"Lonnie" w/10 say*	82
(John Knapp) and WUBS	82
(Paul Lewis) and (risk assessment*)	82
(Ted Greenberg) and WUBS	82
"Lonnie" and Travelex	83
"the Monitor" w/10 told	83
"Keene" and KYA	84
(John Bell) and WUBS	84
(John Knapp) and KYA	86

Search Term	Count
(Lonnie Keene) and MIP*	88
(Dennis Lormel) and interdict*	91
"SWB Monitor" and (pre-paid)	92
"Greenberg" and prepaid	93
"Monitor" w/10 told	93
"the Monitor" w/10 email*	93
(Paul Lewis) and interdict*	94
(John Bell) and interdict*	95
(Paul Lewis) and Recommendation*	95
"Greenberg" and MIP*	97
"SWB Monitor" w/10 state*	97
"Lonnie" and (Periodic Review*)	98
(John Bell) and Recommendation*	98
(Dennis Lormel) and Recommendation*	100
"Keene" and (money order)	101
"Lonnie" and (pre-paid)	101
(John Knapp) and MIP*	101
"SWB Monitor" w/10 report*	103
(John Bell) and (risk assessment*)	103
(John Knapp) and Recommendation*	103
"Greenberg" and WUBS	105
"Keene" and MIP*	105
"the Monitor" and (five percent)	106
"Lonnie" w/10 talk*	108
"SWB Monitor" and (Implementation Plan)	111
WUmonitor@gmail.com	112
"Monitor" w/10 say*	116
"Monitor" and (five percent)	117
"Lonnie" and KYA	118
"Lonnie" w/10 email*	123
"Lonnie" w/10 call*	124
"Monitor" w/10 said	124
(John Knapp) and interdict*	125
"Greenberg" and interdict*	127
(Paul Lewis) and 5%	130
(Ted Greenberg) and Recommendation*	133
"SWB Monitor" w/10 review	136
"SWB Monitor" and (money order)	139
(Lonnie Keene) and interdict*	139
"the Monitor" w/10 talk*	141
(*@WUmonitor.com) and Recommendation*	141
"SWB Monitor" and KYA	145
(Dennis Lormel) and 5%	146
"the Monitor" and (Custom House)	148
"the Monitor" and (Western Union Business Solutions)	151
(John Knapp) and (risk assessment*)	155
(Ted Greenberg) and 5%	156
"Ted" w/10 request*	157
"Lonnie" and WUBS	158
"Ted" and Travelex	158
"Lonnie" and (money order)	163
"the Monitor" and (Business Solutions)	163
"the Monitor" w/10 writ*	164
"Lonnie" w/10 respon*	166
"Lonnie" w/10 state*	166
"SWB Monitor" w/10 request*	166
(John Bell) and 5%	169
"Lonnie" w/10 report*	174
"Greenberg" and Recommendation*	177
"Ted" and prepaid	177
"Monitor" w/10 talk*	178
"Ted" and interdict*	178
(Lonnie Keene) w/10 recommend*	179
"Keene" and interdict*	180
"Keene" w/10 recommend*	180
"SWB Monitor" and MIP*	181
(Dennis Lormel) and (risk assessment*)	182
"Lonnie" and (Implementation Plan)	183
"Lonnie" w/10 plan	199

Search Term	Count
"SWB Monitor" and prepaid	199
"SWB Monitor" and WUBS	200
(Ted Greenberg) and (risk assessment*)	200
(*@WUmonitor com) and (risk assessment*)	209
(John Knapp) and 5%	213
"Lonnie" and prepaid	222
"Ted" and MIP*	229
"Lonnie" w/10 ask*	230
"Lonnie" and MIP*	249
"Monitor" w/10 email*	264
"the Monitor" and Travelex	265
Paul Lewis	266
"the Monitor" w/10 evaluat*	273
"Monitor" w/10 writ*	281
"Ted" and WUBS	283
John Bell	287
(*@WUmonitor com) and 5%	292
"the Monitor" and (know your agent)	295
"Greenberg" and (risk assessment*)	296
"Lonnie" w/10 request*	301
Dennis Lormel	306
"Greenberg" and 5%	307
(Lonnie Keene) and (risk assessment*)	311
(Lonnie Keene) and 5%	313
John Knapp	314
Ted Greenberg	320
"the Monitor" w/10 ask*	327
"the Monitor" w/10 call*	337
"the Monitor" and (agent oversight)	338
"Keene" and (risk assessment*)	345
(Lonnie Keene) and Recommendation*	355
"the Monitor" and (Periodic Review*)	356
"Lonnie" w/10 review	358
"Monitor" and (Western Union Business Solutions)	373
"Ted" and Recommendation*	373
"Lonnie" w/10 recommend*	380
"SWB Monitor" w/10 recommend*	385
"Keene" and Recommendation*	390
"Monitor" and (Custom House)	401
"the Monitor" w/10 respon*	412
"Keene" and 5%	416
"Monitor" and (Business Solutions)	425
"Lonnie" and interdict*	431
"Ted" and (risk assessment*)	468
"SWB Monitor" and interdict*	472
"the Monitor" and (pre-paid)	473
"the Monitor" w/10 propos*	493
"Monitor" and Travelex	503
"the Monitor" and KYA	503
"Monitor" w/10 ask*	507
"Greenberg"	510
"Monitor" and (know your agent)	530
"Monitor" w/10 evaluat*	552
"the Monitor" w/10 report*	553
"Monitor" and (Periodic Review*)	565
"the Monitor" and MIP*	569
"the Monitor" and (Implementation Plan)	588
"the Monitor" and (money order)	653
"Monitor" and (agent oversight)	656
*@WUmonitor com	680
"Monitor" and (pre-paid)	696
Lonnie Keene	705
"the Monitor" and prepaid	751
"the Monitor" and WUBS	753
"Monitor" and MIP*	758
"the Monitor" w/10 plan	760
"Monitor" and (Implementation Plan)	785
"Monitor" w/10 propos*	789
"SWB Monitor" and Recommendation*	827

Search Term	Count
"Monitor" and KYA	841
"Monitor" w/10 call*	846
"Keene"	850
"Ted" and 5%	882
"the Monitor" w/10 request*	890
"Monitor" w/10 respon*	932
"the Monitor" w/10 state*	941
"SWB Monitor" and (risk assessment*)	1007
"SWB Monitor" and 5%	1105
"Monitor" w/10 plan	1127
"Monitor" and (money order)	1151
"Lonnie" and Recommendation*	1185
"Monitor" and WUBS	1252
"the Monitor" w/10 review	1335
"Ted"	1338
"the Monitor" and interdict*	1392
"Monitor" and prepaid	1535
"Lonnie" and 5%	1556
"the Monitor" w/10 recommend*	1599
"Monitor" w/10 request*	1605
"Monitor" w/10 report*	1736
"Monitor" w/10 state*	1740
"Lonnie" and (risk assessment*)	1890
"SWB Monitor"	2159
"Monitor" w/10 review	2346
"Monitor" w/10 recommend*	2583
"Monitor" and interdict*	2963
"the Monitor" and Recommendation*	3050
"the Monitor" and (risk assessment*)	3439
"the Monitor" and 5%	3640
"Lonnie"	3790
"Monitor" and Recommendation*	5241
"Monitor" and (risk assessment*)	6263
"the Monitor"	6530
"Monitor" and 5%	7797
"Monitor"	13840
Entire Set	16575

Search Term	Count
"Greenberg"	66
"Greenberg" and (5 %)	0
"Greenberg" and (5 per cent)	0
"Greenberg" and (5 percent)	0
"Greenberg" and (agent oversight)	7
"Greenberg" and (Business Solutions)	18
"Greenberg" and (Custom House)	10
"Greenberg" and (five per cent)	0
"Greenberg" and (five percent)	2
"Greenberg" and (Implementation Plan)	1
"Greenberg" and (know your agent)	1
"Greenberg" and (money order)	9
"Greenberg" and (Periodic Review*)	1
"Greenberg" and (pre-paid)	0
"Greenberg" and (risk assessment*)	2
"Greenberg" and (Western Union Business Solutions)	13
"Greenberg" and (WU Business Solutions)	0
"Greenberg" and 5%	36
"Greenberg" and interdict*	0
"Greenberg" and KYA	1
"Greenberg" and MIP*	0
"Greenberg" and prepaid	15
"Greenberg" and Recommendation*	13
"Greenberg" and Travelex	10
"Greenberg" and WUBS	12
"Greenberg" w/10 ask*	0
"Greenberg" w/10 call*	1
"Greenberg" w/10 demand*	0
"Greenberg" w/10 email*	0
"Greenberg" w/10 e-mail*	0
"Greenberg" w/10 evaluat*	0
"Greenberg" w/10 plan	4
"Greenberg" w/10 propos*	0
"Greenberg" w/10 recommend*	2
"Greenberg" w/10 report*	10
"Greenberg" w/10 request*	1
"Greenberg" w/10 respon*	1
"Greenberg" w/10 review	2
"Greenberg" w/10 said	0
"Greenberg" w/10 say*	1
"Greenberg" w/10 spoke*	0
"Greenberg" w/10 state*	0
"Greenberg" w/10 talk*	1
"Greenberg" w/10 tell	0
"Greenberg" w/10 told	0
"Greenberg" w/10 writ*	0
"Greenberg" w/10 wrote	0
"Keene"	14
"Keene" and (5 %)	0
"Keene" and (5 per cent)	0
"Keene" and (5 percent)	0
"Keene" and (agent oversight)	6
"Keene" and (Business Solutions)	5
"Keene" and (Custom House)	0
"Keene" and (five per cent)	0
"Keene" and (five percent)	0
"Keene" and (Implementation Plan)	6
"Keene" and (know your agent)	6
"Keene" and (money order)	6
"Keene" and (Periodic Review*)	6
"Keene" and (pre-paid)	6
"Keene" and (risk assessment*)	6
"Keene" and (Western Union Business Solutions)	3
"Keene" and (WU Business Solutions)	0
"Keene" and 5%	11
"Keene" and interdict*	6
"Keene" and KYA	6
"Keene" and MIP*	0
"Keene" and prepaid	7

Search Term	Count
"Keene" and Recommendation*	10
"Keene" and Travelex	3
"Keene" and WUBS	1
"Keene" w/10 ask*	0
"Keene" w/10 call*	0
"Keene" w/10 demand*	0
"Keene" w/10 email*	0
"Keene" w/10 e-mail*	0
"Keene" w/10 evaluat*	0
"Keene" w/10 plan	0
"Keene" w/10 propos*	0
"Keene" w/10 recommend*	0
"Keene" w/10 report*	6
"Keene" w/10 request*	0
"Keene" w/10 respon*	0
"Keene" w/10 review	6
"Keene" w/10 said	0
"Keene" w/10 say*	0
"Keene" w/10 spoke*	0
"Keene" w/10 state*	2
"Keene" w/10 talk*	0
"Keene" w/10 tell	0
"Keene" w/10 told	0
"Keene" w/10 writ*	0
"Keene" w/10 wrote	0
"Lonnie"	10
"Lonnie" and (5 %)	0
"Lonnie" and (5 per cent)	0
"Lonnie" and (5 percent)	0
"Lonnie" and (agent oversight)	6
"Lonnie" and (Business Solutions)	5
"Lonnie" and (Custom House)	0
"Lonnie" and (five per cent)	0
"Lonnie" and (five percent)	0
"Lonnie" and (Implementation Plan)	6
"Lonnie" and (know your agent)	6
"Lonnie" and (money order)	6
"Lonnie" and (Periodic Review*)	6
"Lonnie" and (pre-paid)	6
"Lonnie" and (risk assessment*)	6
"Lonnie" and (Western Union Business Solutions)	3
"Lonnie" and (WU Business Solutions)	0
"Lonnie" and 5%	8
"Lonnie" and interdict*	6
"Lonnie" and KYA	6
"Lonnie" and MIP*	0
"Lonnie" and prepaid	6
"Lonnie" and Recommendation*	10
"Lonnie" and Travelex	3
"Lonnie" and WUBS	0
"Lonnie" w/10 ask*	0
"Lonnie" w/10 call*	0
"Lonnie" w/10 demand*	0
"Lonnie" w/10 email*	6
"Lonnie" w/10 e-mail*	0
"Lonnie" w/10 evaluat*	0
"Lonnie" w/10 plan	0
"Lonnie" w/10 propos*	0
"Lonnie" w/10 recommend*	0
"Lonnie" w/10 report*	0
"Lonnie" w/10 request*	0
"Lonnie" w/10 respon*	0
"Lonnie" w/10 review	0
"Lonnie" w/10 said	0
"Lonnie" w/10 say*	0
"Lonnie" w/10 spoke*	0
"Lonnie" w/10 state*	0
"Lonnie" w/10 talk*	0
"Lonnie" w/10 tell	0

Search Term	Count
"Lonnie" w/10 told	0
"Lonnie" w/10 writ*	0
"Lonnie" w/10 wrote	0
"Monitor"	1377
"Monitor" and (5 %)	0
"Monitor" and (5 per cent)	4
"Monitor" and (5 percent)	36
"Monitor" and (agent oversight)	28
"Monitor" and (Business Solutions)	193
"Monitor" and (Custom House)	64
"Monitor" and (five per cent)	27
"Monitor" and (five percent)	16
"Monitor" and (Implementation Plan)	25
"Monitor" and (know your agent)	14
"Monitor" and (money order)	97
"Monitor" and (Periodic Review*)	16
"Monitor" and (pre-paid)	55
"Monitor" and (risk assessment*)	78
"Monitor" and (Western Union Business Solutions)	128
"Monitor" and (WU Business Solutions)	11
"Monitor" and 5%	1094
"Monitor" and interdict*	111
"Monitor" and KYA	24
"Monitor" and MIP*	1
"Monitor" and prepaid	523
"Monitor" and Recommendation*	290
"Monitor" and Travelex	112
"Monitor" and WUBS	235
"Monitor" w/10 ask*	16
"Monitor" w/10 call*	29
"Monitor" w/10 demand*	9
"Monitor" w/10 email*	86
"Monitor" w/10 e-mail*	95
"Monitor" w/10 evaluat*	32
"Monitor" w/10 plan	48
"Monitor" w/10 propos*	14
"Monitor" w/10 recommend*	56
"Monitor" w/10 report*	76
"Monitor" w/10 request*	25
"Monitor" w/10 respon*	48
"Monitor" w/10 review	85
"Monitor" w/10 said	12
"Monitor" w/10 say*	2
"Monitor" w/10 spoke*	1
"Monitor" w/10 state*	65
"Monitor" w/10 talk*	0
"Monitor" w/10 tell	0
"Monitor" w/10 told	1
"Monitor" w/10 writ*	12
"Monitor" w/10 wrote	0
"Monitorship"	0
"Monitorship" and (5 %)	0
"Monitorship" and (5 per cent)	0
"Monitorship" and (5 percent)	0
"Monitorship" and (agent oversight)	0
"Monitorship" and (Business Solutions)	0
"Monitorship" and (Custom House)	0
"Monitorship" and (five per cent)	0
"Monitorship" and (five percent)	0
"Monitorship" and (Implementation Plan)	0
"Monitorship" and (know your agent)	0
"Monitorship" and (money order)	0
"Monitorship" and (Periodic Review*)	0
"Monitorship" and (pre-paid)	0
"Monitorship" and (risk assessment*)	0
"Monitorship" and (Western Union Business Solutions)	0
"Monitorship" and (WU Business Solutions)	0
"Monitorship" and 5%	0
"Monitorship" and interdict*	0

Search Term	Count
"Monitorship" and KYA	0
"Monitorship" and MIP*	0
"Monitorship" and prepaid	0
"Monitorship" and Recommendation*	0
"Monitorship" and Travelex	0
"Monitorship" and WUBS	0
"Monitorship" w/10 ask*	0
"Monitorship" w/10 call*	0
"Monitorship" w/10 demand*	0
"Monitorship" w/10 email*	0
"Monitorship" w/10 e-mail*	0
"Monitorship" w/10 evaluat*	0
"Monitorship" w/10 plan	0
"Monitorship" w/10 propos*	0
"Monitorship" w/10 recommend*	0
"Monitorship" w/10 report*	0
"Monitorship" w/10 request*	0
"Monitorship" w/10 respon*	0
"Monitorship" w/10 review	0
"Monitorship" w/10 said	0
"Monitorship" w/10 say*	0
"Monitorship" w/10 spoke*	0
"Monitorship" w/10 state*	0
"Monitorship" w/10 talk*	0
"Monitorship" w/10 tell	0
"Monitorship" w/10 told	0
"Monitorship" w/10 writ*	0
"Monitorship" w/10 wrote	0
"SWB Monitor"	25
"SWB Monitor" and (5 %)	0
"SWB Monitor" and (5 per cent)	0
"SWB Monitor" and (5 percent)	0
"SWB Monitor" and (agent oversight)	1
"SWB Monitor" and (Business Solutions)	4
"SWB Monitor" and (Custom House)	1
"SWB Monitor" and (five per cent)	0
"SWB Monitor" and (five percent)	0
"SWB Monitor" and (Implementation Plan)	7
"SWB Monitor" and (know your agent)	1
"SWB Monitor" and (money order)	9
"SWB Monitor" and (Periodic Review*)	1
"SWB Monitor" and (pre-paid)	3
"SWB Monitor" and (risk assessment*)	9
"SWB Monitor" and (Western Union Business Solutions)	2
"SWB Monitor" and (WU Business Solutions)	1
"SWB Monitor" and 5%	21
"SWB Monitor" and interdict*	9
"SWB Monitor" and KYA	5
"SWB Monitor" and MIP*	1
"SWB Monitor" and prepaid	13
"SWB Monitor" and Recommendation*	6
"SWB Monitor" and Travelex	5
"SWB Monitor" and WUBS	7
"SWB Monitor" w/10 ask*	0
"SWB Monitor" w/10 call*	0
"SWB Monitor" w/10 demand*	0
"SWB Monitor" w/10 email*	0
"SWB Monitor" w/10 e-mail*	0
"SWB Monitor" w/10 evaluat*	0
"SWB Monitor" w/10 plan	0
"SWB Monitor" w/10 propos*	0
"SWB Monitor" w/10 recommend*	3
"SWB Monitor" w/10 report*	0
"SWB Monitor" w/10 request*	1
"SWB Monitor" w/10 respon*	3
"SWB Monitor" w/10 review	0
"SWB Monitor" w/10 said	0
"SWB Monitor" w/10 say*	0
"SWB Monitor" w/10 spoke*	0

Search Term	Count
"SWB Monitor" w/10 state*	5
"SWB Monitor" w/10 talk*	0
"SWB Monitor" w/10 tell	0
"SWB Monitor" w/10 told	0
"SWB Monitor" w/10 writ*	0
"SWB Monitor" w/10 wrote	0
"SWBA Monitor"	0
"SWBA Monitor" and (5 %)	0
"SWBA Monitor" and (5 per cent)	0
"SWBA Monitor" and (5 percent)	0
"SWBA Monitor" and (agent oversight)	0
"SWBA Monitor" and (Business Solutions)	0
"SWBA Monitor" and (Custom House)	0
"SWBA Monitor" and (five per cent)	0
"SWBA Monitor" and (five percent)	0
"SWBA Monitor" and (Implementation Plan)	0
"SWBA Monitor" and (know your agent)	0
"SWBA Monitor" and (money order)	0
"SWBA Monitor" and (Periodic Review*)	0
"SWBA Monitor" and (pre-paid)	0
"SWBA Monitor" and (risk assessment*)	0
"SWBA Monitor" and (Western Union Business Solutions)	0
"SWBA Monitor" and (WU Business Solutions)	0
"SWBA Monitor" and 5%	0
"SWBA Monitor" and interdict*	0
"SWBA Monitor" and KYA	0
"SWBA Monitor" and MIP*	0
"SWBA Monitor" and prepaid	0
"SWBA Monitor" and Recommendation*	0
"SWBA Monitor" and Travelex	0
"SWBA Monitor" and WUBS	0
"SWBA Monitor" w/10 ask*	0
"SWBA Monitor" w/10 call*	0
"SWBA Monitor" w/10 demand*	0
"SWBA Monitor" w/10 email*	0
"SWBA Monitor" w/10 e-mail*	0
"SWBA Monitor" w/10 evaluat*	0
"SWBA Monitor" w/10 plan	0
"SWBA Monitor" w/10 propos*	0
"SWBA Monitor" w/10 recommend*	0
"SWBA Monitor" w/10 report*	0
"SWBA Monitor" w/10 request*	0
"SWBA Monitor" w/10 respon*	0
"SWBA Monitor" w/10 review	0
"SWBA Monitor" w/10 said	0
"SWBA Monitor" w/10 say*	0
"SWBA Monitor" w/10 spoke*	0
"SWBA Monitor" w/10 state*	0
"SWBA Monitor" w/10 talk*	0
"SWBA Monitor" w/10 tell	0
"SWBA Monitor" w/10 told	0
"SWBA Monitor" w/10 writ*	0
"SWBA Monitor" w/10 wrote	0
"Ted"	102
"Ted" and (5 %)	0
"Ted" and (5 per cent)	0
"Ted" and (5 percent)	3
"Ted" and (agent oversight)	1
"Ted" and (Business Solutions)	3
"Ted" and (Custom House)	1
"Ted" and (five per cent)	0
"Ted" and (five percent)	3
"Ted" and (Implementation Plan)	2
"Ted" and (know your agent)	1
"Ted" and (money order)	1
"Ted" and (Periodic Review*)	1
"Ted" and (pre-paid)	1
"Ted" and (risk assessment*)	6
"Ted" and (Western Union Business Solutions)	3

Search Term	Count
"Ted" and (WU Business Solutions)	1
"Ted" and 5%	45
"Ted" and interdict*	1
"Ted" and KYA	1
"Ted" and MIP*	1
"Ted" and prepaid	13
"Ted" and Recommendation*	8
"Ted" and Travelex	6
"Ted" and WUBS	5
"Ted" w/10 ask*	0
"Ted" w/10 call*	1
"Ted" w/10 demand*	1
"Ted" w/10 email*	0
"Ted" w/10 e-mail*	0
"Ted" w/10 evaluat*	0
"Ted" w/10 plan	1
"Ted" w/10 propos*	0
"Ted" w/10 recommend*	0
"Ted" w/10 report*	1
"Ted" w/10 request*	0
"Ted" w/10 respon*	0
"Ted" w/10 review	0
"Ted" w/10 said	0
"Ted" w/10 say*	8
"Ted" w/10 spoke*	0
"Ted" w/10 state*	5
"Ted" w/10 talk*	0
"Ted" w/10 tell	0
"Ted" w/10 told	0
"Ted" w/10 writ*	0
"Ted" w/10 wrote	0
"the Monitor"	136
"the Monitor" and (5 %)	0
"the Monitor" and (5 per cent)	0
"the Monitor" and (5 percent)	0
"the Monitor" and (agent oversight)	17
"the Monitor" and (Business Solutions)	22
"the Monitor" and (Custom House)	8
"the Monitor" and (five per cent)	0
"the Monitor" and (five percent)	6
"the Monitor" and (Implementation Plan)	7
"the Monitor" and (know your agent)	8
"the Monitor" and (money order)	28
"the Monitor" and (Periodic Review*)	8
"the Monitor" and (pre-paid)	10
"the Monitor" and (risk assessment*)	11
"the Monitor" and (Western Union Business Solutions)	14
"the Monitor" and (WU Business Solutions)	1
"the Monitor" and 5%	130
"the Monitor" and interdict*	87
"the Monitor" and KYA	10
"the Monitor" and MIP*	1
"the Monitor" and prepaid	117
"the Monitor" and Recommendation*	111
"the Monitor" and Travelex	18
"the Monitor" and WUBS	87
"the Monitor" w/10 ask*	5
"the Monitor" w/10 call*	7
"the Monitor" w/10 demand*	0
"the Monitor" w/10 email*	8
"the Monitor" w/10 e-mail*	0
"the Monitor" w/10 evaluat*	1
"the Monitor" w/10 plan	6
"the Monitor" w/10 propos*	6
"the Monitor" w/10 recommend*	19
"the Monitor" w/10 report*	11
"the Monitor" w/10 request*	11
"the Monitor" w/10 respon*	0
"the Monitor" w/10 review	13

Search Term	Count
"the Monitor" w/10 said	0
"the Monitor" w/10 say*	0
"the Monitor" w/10 spoke*	0
"the Monitor" w/10 state*	14
"the Monitor" w/10 talk*	0
"the Monitor" w/10 tell	0
"the Monitor" w/10 told	1
"the Monitor" w/10 writ*	6
"the Monitor" w/10 wrote	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 %)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 per cent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 percent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (agent oversight)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Business Solutions)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Custom House)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (five per cent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (five percent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Implementation Plan)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (know your agent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (money order)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Periodic Review*)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (pre-paid)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (risk assessment*)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Western Union Business Solutions)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (WU Business Solutions)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and 5%	0
((Frederick R. Kessler) or (Frederick R Kessler)) and interdict*	0
((Frederick R. Kessler) or (Frederick R Kessler)) and KYA	0
((Frederick R. Kessler) or (Frederick R Kessler)) and MIP*	0
((Frederick R. Kessler) or (Frederick R Kessler)) and prepaid	0
((Frederick R. Kessler) or (Frederick R Kessler)) and Recommendation*	0
((Frederick R. Kessler) or (Frederick R Kessler)) and Traveler	0
((Frederick R. Kessler) or (Frederick R Kessler)) and WUBS	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 ask*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 call*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 demand*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 email*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 e-mail*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 evaluat*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 plan	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 propos*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 recommend*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 report*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 request*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 respon*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 review	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 said	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 say*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 spoke*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 state*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 talk*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 tell	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 told	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 writ*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 wrote	0
(*@WUmonitor com) and (5 %)	0
(*@WUmonitor com) and (5 per cent)	0
(*@WUmonitor com) and (5 percent)	0
(*@WUmonitor com) and (agent oversight)	0
(*@WUmonitor com) and (Business Solutions)	0
(*@WUmonitor com) and (Custom House)	0
(*@WUmonitor com) and (five per cent)	0
(*@WUmonitor com) and (five percent)	0
(*@WUmonitor com) and (Implementation Plan)	0
(*@WUmonitor com) and (know your agent)	0
(*@WUmonitor com) and (money order)	0
(*@WUmonitor com) and (Periodic Review*)	0
(*@WUmonitor com) and (pre-paid)	0
(*@WUmonitor com) and (risk assessment*)	0

Search Term	Count
(*@WUmonitor com) and (Western Union Business Solutions)	0
(*@WUmonitor com) and (WU Business Solutions)	0
(*@WUmonitor com) and 5%	0
(*@WUmonitor com) and interdict*	0
(*@WUmonitor com) and KYA	0
(*@WUmonitor com) and MIP*	0
(*@WUmonitor com) and prepaid	0
(*@WUmonitor com) and Recommendation*	0
(*@WUmonitor com) and Travelex	0
(*@WUmonitor com) and WUBS	0
(*@WUmonitor com) w/10 ask*	0
(*@WUmonitor com) w/10 call*	0
(*@WUmonitor com) w/10 demand*	0
(*@WUmonitor com) w/10 email*	0
(*@WUmonitor com) w/10 e-mail*	0
(*@WUmonitor com) w/10 evaluat*	0
(*@WUmonitor com) w/10 plan	0
(*@WUmonitor com) w/10 propos*	0
(*@WUmonitor com) w/10 recommend*	0
(*@WUmonitor com) w/10 report*	0
(*@WUmonitor com) w/10 request*	0
(*@WUmonitor com) w/10 respon*	0
(*@WUmonitor com) w/10 review	0
(*@WUmonitor com) w/10 said	0
(*@WUmonitor com) w/10 say*	0
(*@WUmonitor com) w/10 spoke*	0
(*@WUmonitor com) w/10 state*	0
(*@WUmonitor com) w/10 talk*	0
(*@WUmonitor com) w/10 tell	0
(*@WUmonitor com) w/10 told	0
(*@WUmonitor com) w/10 writ*	0
(*@WUmonitor com) w/10 wrote	0
(Dennis Lormel) and (5 %)	0
(Dennis Lormel) and (5 per cent)	0
(Dennis Lormel) and (5 percent)	0
(Dennis Lormel) and (agent oversight)	0
(Dennis Lormel) and (Business Solutions)	0
(Dennis Lormel) and (Custom House)	0
(Dennis Lormel) and (five per cent)	0
(Dennis Lormel) and (five percent)	0
(Dennis Lormel) and (Implementation Plan)	0
(Dennis Lormel) and (know your agent)	0
(Dennis Lormel) and (money order)	0
(Dennis Lormel) and (Periodic Review*)	0
(Dennis Lormel) and (pre-paid)	0
(Dennis Lormel) and (risk assessment*)	0
(Dennis Lormel) and (Western Union Business Solutions)	0
(Dennis Lormel) and (WU Business Solutions)	0
(Dennis Lormel) and 5%	0
(Dennis Lormel) and interdict*	0
(Dennis Lormel) and KYA	0
(Dennis Lormel) and MIP*	0
(Dennis Lormel) and prepaid	0
(Dennis Lormel) and Recommendation*	0
(Dennis Lormel) and Travelex	0
(Dennis Lormel) and WUBS	0
(Dennis Lormel) w/10 ask*	0
(Dennis Lormel) w/10 call*	0
(Dennis Lormel) w/10 demand*	0
(Dennis Lormel) w/10 email*	0
(Dennis Lormel) w/10 e-mail*	0
(Dennis Lormel) w/10 evaluat*	0
(Dennis Lormel) w/10 plan	0
(Dennis Lormel) w/10 propos*	0
(Dennis Lormel) w/10 recommend*	0
(Dennis Lormel) w/10 report*	0
(Dennis Lormel) w/10 request*	0
(Dennis Lormel) w/10 respon*	0
(Dennis Lormel) w/10 review	0

Search Term	Count
(Dennis Lormel) w/10 said	0
(Dennis Lormel) w/10 say*	0
(Dennis Lormel) w/10 spoke*	0
(Dennis Lormel) w/10 state*	0
(Dennis Lormel) w/10 talk*	0
(Dennis Lormel) w/10 tell	0
(Dennis Lormel) w/10 told	0
(Dennis Lormel) w/10 writ*	0
(Dennis Lormel) w/10 wrote	0
(Douglas Meadows) and (5 %)	0
(Douglas Meadows) and (5 per cent)	0
(Douglas Meadows) and (5 percent)	0
(Douglas Meadows) and (agent oversight)	0
(Douglas Meadows) and (Business Solutions)	0
(Douglas Meadows) and (Custom House)	0
(Douglas Meadows) and (five per cent)	0
(Douglas Meadows) and (five percent)	0
(Douglas Meadows) and (Implementation Plan)	0
(Douglas Meadows) and (know your agent)	0
(Douglas Meadows) and (money order)	0
(Douglas Meadows) and (Periodic Review*)	0
(Douglas Meadows) and (pre-paid)	0
(Douglas Meadows) and (risk assessment*)	0
(Douglas Meadows) and (Western Union Business Solutions)	0
(Douglas Meadows) and (WU Business Solutions)	0
(Douglas Meadows) and 5%	0
(Douglas Meadows) and interdict*	0
(Douglas Meadows) and KYA	0
(Douglas Meadows) and MIP*	0
(Douglas Meadows) and prepaid	0
(Douglas Meadows) and Recommendation*	0
(Douglas Meadows) and Travelex	0
(Douglas Meadows) and WUBS	0
(Douglas Meadows) w/10 ask*	0
(Douglas Meadows) w/10 call*	0
(Douglas Meadows) w/10 demand*	0
(Douglas Meadows) w/10 email*	0
(Douglas Meadows) w/10 e-mail*	0
(Douglas Meadows) w/10 evaluat*	0
(Douglas Meadows) w/10 plan	0
(Douglas Meadows) w/10 propos*	0
(Douglas Meadows) w/10 recommend*	0
(Douglas Meadows) w/10 report*	0
(Douglas Meadows) w/10 request*	0
(Douglas Meadows) w/10 respon*	0
(Douglas Meadows) w/10 review	0
(Douglas Meadows) w/10 said	0
(Douglas Meadows) w/10 say*	0
(Douglas Meadows) w/10 spoke*	0
(Douglas Meadows) w/10 state*	0
(Douglas Meadows) w/10 talk*	0
(Douglas Meadows) w/10 tell	0
(Douglas Meadows) w/10 told	0
(Douglas Meadows) w/10 writ*	0
(Douglas Meadows) w/10 wrote	0
(Ernest Sohn) and (5 %)	0
(Ernest Sohn) and (5 per cent)	0
(Ernest Sohn) and (5 percent)	0
(Ernest Sohn) and (agent oversight)	0
(Ernest Sohn) and (Business Solutions)	0
(Ernest Sohn) and (Custom House)	0
(Ernest Sohn) and (five per cent)	0
(Ernest Sohn) and (five percent)	0
(Ernest Sohn) and (Implementation Plan)	0
(Ernest Sohn) and (know your agent)	0
(Ernest Sohn) and (money order)	0
(Ernest Sohn) and (Periodic Review*)	0
(Ernest Sohn) and (pre-paid)	0
(Ernest Sohn) and (risk assessment*)	0

Search Term	Count
(Ernest Sohn) and (Western Union Business Solutions)	0
(Ernest Sohn) and (WU Business Solutions)	0
(Ernest Sohn) and 5%	0
(Ernest Sohn) and interdict*	0
(Ernest Sohn) and KYA	0
(Ernest Sohn) and MIP*	0
(Ernest Sohn) and prepaid	0
(Ernest Sohn) and Recommendation*	0
(Ernest Sohn) and Travelex	0
(Ernest Sohn) and WUBS	0
(Ernest Sohn) w/10 ask*	0
(Ernest Sohn) w/10 call*	0
(Ernest Sohn) w/10 demand*	0
(Ernest Sohn) w/10 email*	0
(Ernest Sohn) w/10 e-mail*	0
(Ernest Sohn) w/10 evaluat*	0
(Ernest Sohn) w/10 plan	0
(Ernest Sohn) w/10 propos*	0
(Ernest Sohn) w/10 recommend*	0
(Ernest Sohn) w/10 report*	0
(Ernest Sohn) w/10 request*	0
(Ernest Sohn) w/10 respon*	0
(Ernest Sohn) w/10 review	0
(Ernest Sohn) w/10 said	0
(Ernest Sohn) w/10 say*	0
(Ernest Sohn) w/10 spoke*	0
(Ernest Sohn) w/10 state*	0
(Ernest Sohn) w/10 talk*	0
(Ernest Sohn) w/10 tell	0
(Ernest Sohn) w/10 told	0
(Ernest Sohn) w/10 writ*	0
(Ernest Sohn) w/10 wrote	0
(Frederick R. Kessler) or (Frederick R Kessler)	0
(JD Hannick) and (5 %)	0
(JD Hannick) and (5 per cent)	0
(JD Hannick) and (5 percent)	0
(JD Hannick) and (agent oversight)	0
(JD Hannick) and (Business Solutions)	0
(JD Hannick) and (Custom House)	0
(JD Hannick) and (five per cent)	0
(JD Hannick) and (five percent)	0
(JD Hannick) and (Implementation Plan)	0
(JD Hannick) and (know your agent)	0
(JD Hannick) and (money order)	0
(JD Hannick) and (Periodic Review*)	0
(JD Hannick) and (pre-paid)	0
(JD Hannick) and (risk assessment*)	0
(JD Hannick) and (Western Union Business Solutions)	0
(JD Hannick) and (WU Business Solutions)	0
(JD Hannick) and 5%	0
(JD Hannick) and interdict*	0
(JD Hannick) and KYA	0
(JD Hannick) and MIP*	0
(JD Hannick) and prepaid	0
(JD Hannick) and Recommendation*	0
(JD Hannick) and Travelex	0
(JD Hannick) and WUBS	0
(JD Hannick) w/10 ask*	0
(JD Hannick) w/10 call*	0
(JD Hannick) w/10 demand*	0
(JD Hannick) w/10 email*	0
(JD Hannick) w/10 e-mail*	0
(JD Hannick) w/10 evaluat*	0
(JD Hannick) w/10 plan	0
(JD Hannick) w/10 propos*	0
(JD Hannick) w/10 recommend*	0
(JD Hannick) w/10 report*	0
(JD Hannick) w/10 request*	0
(JD Hannick) w/10 respon*	0

Search Term	Count
(JD Hannick) w/10 review	0
(JD Hannick) w/10 said	0
(JD Hannick) w/10 say*	0
(JD Hannick) w/10 spoke*	0
(JD Hannick) w/10 state*	0
(JD Hannick) w/10 talk*	0
(JD Hannick) w/10 tell	0
(JD Hannick) w/10 told	0
(JD Hannick) w/10 writ*	0
(JD Hannick) w/10 wrote	0
(Jeff Hunter) and (5 %)	0
(Jeff Hunter) and (5 per cent)	0
(Jeff Hunter) and (5 percent)	0
(Jeff Hunter) and (agent oversight)	0
(Jeff Hunter) and (Business Solutions)	0
(Jeff Hunter) and (Custom House)	0
(Jeff Hunter) and (five per cent)	0
(Jeff Hunter) and (five percent)	0
(Jeff Hunter) and (Implementation Plan)	0
(Jeff Hunter) and (know your agent)	0
(Jeff Hunter) and (money order)	0
(Jeff Hunter) and (Periodic Review*)	0
(Jeff Hunter) and (pre-paid)	0
(Jeff Hunter) and (risk assessment*)	0
(Jeff Hunter) and (Western Union Business Solutions)	0
(Jeff Hunter) and (WU Business Solutions)	0
(Jeff Hunter) and 5%	0
(Jeff Hunter) and interdict*	0
(Jeff Hunter) and KYA	0
(Jeff Hunter) and MIP*	0
(Jeff Hunter) and prepaid	0
(Jeff Hunter) and Recommendation*	0
(Jeff Hunter) and Travelex	0
(Jeff Hunter) and WUBS	0
(Jeff Hunter) w/10 ask*	0
(Jeff Hunter) w/10 call*	0
(Jeff Hunter) w/10 demand*	0
(Jeff Hunter) w/10 email*	0
(Jeff Hunter) w/10 e-mail*	0
(Jeff Hunter) w/10 evaluat*	0
(Jeff Hunter) w/10 plan	0
(Jeff Hunter) w/10 propos*	0
(Jeff Hunter) w/10 recommend*	0
(Jeff Hunter) w/10 report*	0
(Jeff Hunter) w/10 request*	0
(Jeff Hunter) w/10 respon*	0
(Jeff Hunter) w/10 review	0
(Jeff Hunter) w/10 said	0
(Jeff Hunter) w/10 say*	0
(Jeff Hunter) w/10 spoke*	0
(Jeff Hunter) w/10 state*	0
(Jeff Hunter) w/10 talk*	0
(Jeff Hunter) w/10 tell	0
(Jeff Hunter) w/10 told	0
(Jeff Hunter) w/10 writ*	0
(Jeff Hunter) w/10 wrote	0
(John Bell) and (5 %)	0
(John Bell) and (5 per cent)	0
(John Bell) and (5 percent)	0
(John Bell) and (agent oversight)	0
(John Bell) and (Business Solutions)	0
(John Bell) and (Custom House)	0
(John Bell) and (five per cent)	0
(John Bell) and (five percent)	0
(John Bell) and (Implementation Plan)	0
(John Bell) and (know your agent)	0
(John Bell) and (money order)	0
(John Bell) and (Periodic Review*)	0
(John Bell) and (pre-paid)	0

Search Term	Count
(John Bell) and (risk assessment*)	0
(John Bell) and (Western Union Business Solutions)	0
(John Bell) and (WU Business Solutions)	0
(John Bell) and 5%	0
(John Bell) and interdict*	0
(John Bell) and KYA	0
(John Bell) and MIP*	0
(John Bell) and prepaid	0
(John Bell) and Recommendation*	0
(John Bell) and Travelex	0
(John Bell) and WUBS	0
(John Bell) w/10 ask*	0
(John Bell) w/10 call*	0
(John Bell) w/10 demand*	0
(John Bell) w/10 email*	0
(John Bell) w/10 e-mail*	0
(John Bell) w/10 evaluat*	0
(John Bell) w/10 plan	0
(John Bell) w/10 propos*	0
(John Bell) w/10 recommend*	0
(John Bell) w/10 report*	0
(John Bell) w/10 request*	0
(John Bell) w/10 respon*	0
(John Bell) w/10 review	0
(John Bell) w/10 said	0
(John Bell) w/10 say*	0
(John Bell) w/10 spoke*	0
(John Bell) w/10 state*	0
(John Bell) w/10 talk*	0
(John Bell) w/10 tell	0
(John Bell) w/10 told	0
(John Bell) w/10 writ*	0
(John Bell) w/10 wrote	0
(John De Wulf) and (5 %)	0
(John De Wulf) and (5 per cent)	0
(John De Wulf) and (5 percent)	0
(John De Wulf) and (agent oversight)	0
(John De Wulf) and (Business Solutions)	0
(John De Wulf) and (Custom House)	0
(John De Wulf) and (five per cent)	0
(John De Wulf) and (five percent)	0
(John De Wulf) and (Implementation Plan)	0
(John De Wulf) and (know your agent)	0
(John De Wulf) and (money order)	0
(John De Wulf) and (Periodic Review*)	0
(John De Wulf) and (pre-paid)	0
(John De Wulf) and (risk assessment*)	0
(John De Wulf) and (Western Union Business Solutions)	0
(John De Wulf) and (WU Business Solutions)	0
(John De Wulf) and 5%	0
(John De Wulf) and interdict*	0
(John De Wulf) and KYA	0
(John De Wulf) and MIP*	0
(John De Wulf) and prepaid	0
(John De Wulf) and Recommendation*	0
(John De Wulf) and Travelex	0
(John De Wulf) and WUBS	0
(John De Wulf) w/10 ask*	0
(John De Wulf) w/10 call*	0
(John De Wulf) w/10 demand*	0
(John De Wulf) w/10 email*	0
(John De Wulf) w/10 e-mail*	0
(John De Wulf) w/10 evaluat*	0
(John De Wulf) w/10 plan	0
(John De Wulf) w/10 propos*	0
(John De Wulf) w/10 recommend*	0
(John De Wulf) w/10 report*	0
(John De Wulf) w/10 request*	0
(John De Wulf) w/10 respon*	0

Search Term	Count
(John De Wulf) w/10 review	0
(John De Wulf) w/10 said	0
(John De Wulf) w/10 say*	0
(John De Wulf) w/10 spoke*	0
(John De Wulf) w/10 state*	0
(John De Wulf) w/10 talk*	0
(John De Wulf) w/10 tell	0
(John De Wulf) w/10 told	0
(John De Wulf) w/10 writ*	0
(John De Wulf) w/10 wrote	0
(John Knapp) and (5 %)	0
(John Knapp) and (5 per cent)	0
(John Knapp) and (5 percent)	0
(John Knapp) and (agent oversight)	0
(John Knapp) and (Business Solutions)	0
(John Knapp) and (Custom House)	0
(John Knapp) and (five per cent)	0
(John Knapp) and (five percent)	0
(John Knapp) and (Implementation Plan)	0
(John Knapp) and (know your agent)	0
(John Knapp) and (money order)	0
(John Knapp) and (Periodic Review*)	0
(John Knapp) and (pre-paid)	0
(John Knapp) and (risk assessment*)	0
(John Knapp) and (Western Union Business Solutions)	0
(John Knapp) and (WU Business Solutions)	0
(John Knapp) and 5%	0
(John Knapp) and interdict*	0
(John Knapp) and KYA	0
(John Knapp) and MIP*	0
(John Knapp) and prepaid	0
(John Knapp) and Recommendation*	0
(John Knapp) and Travelex	0
(John Knapp) and WUBS	0
(John Knapp) w/10 ask*	0
(John Knapp) w/10 call*	0
(John Knapp) w/10 demand*	0
(John Knapp) w/10 email*	0
(John Knapp) w/10 e-mail*	0
(John Knapp) w/10 evaluat*	0
(John Knapp) w/10 plan	0
(John Knapp) w/10 propos*	0
(John Knapp) w/10 recommend*	0
(John Knapp) w/10 report*	0
(John Knapp) w/10 request*	0
(John Knapp) w/10 respon*	0
(John Knapp) w/10 review	0
(John Knapp) w/10 said	0
(John Knapp) w/10 say*	0
(John Knapp) w/10 spoke*	0
(John Knapp) w/10 state*	0
(John Knapp) w/10 talk*	0
(John Knapp) w/10 tell	0
(John Knapp) w/10 told	0
(John Knapp) w/10 writ*	0
(John Knapp) w/10 wrote	0
(Lisa Dawson) and (5 %)	0
(Lisa Dawson) and (5 per cent)	0
(Lisa Dawson) and (5 percent)	0
(Lisa Dawson) and (agent oversight)	0
(Lisa Dawson) and (Business Solutions)	0
(Lisa Dawson) and (Custom House)	0
(Lisa Dawson) and (five per cent)	0
(Lisa Dawson) and (five percent)	0
(Lisa Dawson) and (Implementation Plan)	0
(Lisa Dawson) and (know your agent)	0
(Lisa Dawson) and (money order)	0
(Lisa Dawson) and (Periodic Review*)	0
(Lisa Dawson) and (pre-paid)	0

Search Term	Count
(Lisa Dawson) and (risk assessment*)	0
(Lisa Dawson) and (Western Union Business Solutions)	0
(Lisa Dawson) and (WU Business Solutions)	0
(Lisa Dawson) and 5%	0
(Lisa Dawson) and interdict*	0
(Lisa Dawson) and KYA	0
(Lisa Dawson) and MIP*	0
(Lisa Dawson) and prepaid	0
(Lisa Dawson) and Recommendation*	0
(Lisa Dawson) and Travelex	0
(Lisa Dawson) and WUBS	0
(Lisa Dawson) w/10 ask*	0
(Lisa Dawson) w/10 call*	0
(Lisa Dawson) w/10 demand*	0
(Lisa Dawson) w/10 email*	0
(Lisa Dawson) w/10 e-mail*	0
(Lisa Dawson) w/10 evaluat*	0
(Lisa Dawson) w/10 plan	0
(Lisa Dawson) w/10 propos*	0
(Lisa Dawson) w/10 recommend*	0
(Lisa Dawson) w/10 report*	0
(Lisa Dawson) w/10 request*	0
(Lisa Dawson) w/10 respon*	0
(Lisa Dawson) w/10 review	0
(Lisa Dawson) w/10 said	0
(Lisa Dawson) w/10 say*	0
(Lisa Dawson) w/10 spoke*	0
(Lisa Dawson) w/10 state*	0
(Lisa Dawson) w/10 talk*	0
(Lisa Dawson) w/10 tell	0
(Lisa Dawson) w/10 told	0
(Lisa Dawson) w/10 writ*	0
(Lisa Dawson) w/10 wrote	0
(Lonnie Keene) and (5 %)	0
(Lonnie Keene) and (5 per cent)	0
(Lonnie Keene) and (5 percent)	0
(Lonnie Keene) and (agent oversight)	0
(Lonnie Keene) and (Business Solutions)	2
(Lonnie Keene) and (Custom House)	0
(Lonnie Keene) and (five per cent)	0
(Lonnie Keene) and (five percent)	0
(Lonnie Keene) and (Implementation Plan)	0
(Lonnie Keene) and (know your agent)	0
(Lonnie Keene) and (money order)	0
(Lonnie Keene) and (Periodic Review*)	0
(Lonnie Keene) and (pre-paid)	0
(Lonnie Keene) and (risk assessment*)	0
(Lonnie Keene) and (Western Union Business Solutions)	0
(Lonnie Keene) and (WU Business Solutions)	0
(Lonnie Keene) and 5%	2
(Lonnie Keene) and interdict*	0
(Lonnie Keene) and KYA	0
(Lonnie Keene) and MIP*	0
(Lonnie Keene) and prepaid	0
(Lonnie Keene) and Recommendation*	4
(Lonnie Keene) and Travelex	0
(Lonnie Keene) and WUBS	0
(Lonnie Keene) w/10 ask*	0
(Lonnie Keene) w/10 call*	0
(Lonnie Keene) w/10 demand*	0
(Lonnie Keene) w/10 email*	0
(Lonnie Keene) w/10 e-mail*	0
(Lonnie Keene) w/10 evaluat*	0
(Lonnie Keene) w/10 plan	0
(Lonnie Keene) w/10 propos*	0
(Lonnie Keene) w/10 recommend*	0
(Lonnie Keene) w/10 report*	0
(Lonnie Keene) w/10 request*	0
(Lonnie Keene) w/10 respon*	0

Search Term	Count
(Lonnie Keene) w/10 review	0
(Lonnie Keene) w/10 said	0
(Lonnie Keene) w/10 say*	0
(Lonnie Keene) w/10 spoke*	0
(Lonnie Keene) w/10 state*	0
(Lonnie Keene) w/10 talk*	0
(Lonnie Keene) w/10 tell	0
(Lonnie Keene) w/10 told	0
(Lonnie Keene) w/10 writ*	0
(Lonnie Keene) w/10 wrote	0
(Matt Derstine) and (5 %)	0
(Matt Derstine) and (5 per cent)	0
(Matt Derstine) and (5 percent)	0
(Matt Derstine) and (agent oversight)	0
(Matt Derstine) and (Business Solutions)	0
(Matt Derstine) and (Custom House)	0
(Matt Derstine) and (five per cent)	0
(Matt Derstine) and (five percent)	0
(Matt Derstine) and (Implementation Plan)	0
(Matt Derstine) and (know your agent)	0
(Matt Derstine) and (money order)	0
(Matt Derstine) and (Periodic Review*)	0
(Matt Derstine) and (pre-paid)	0
(Matt Derstine) and (risk assessment*)	0
(Matt Derstine) and (Western Union Business Solutions)	0
(Matt Derstine) and (WU Business Solutions)	0
(Matt Derstine) and 5%	0
(Matt Derstine) and interdict*	0
(Matt Derstine) and KYA	0
(Matt Derstine) and MIP*	0
(Matt Derstine) and prepaid	0
(Matt Derstine) and Recommendation*	0
(Matt Derstine) and Travelex	0
(Matt Derstine) and WUBS	0
(Matt Derstine) w/10 ask*	0
(Matt Derstine) w/10 call*	0
(Matt Derstine) w/10 demand*	0
(Matt Derstine) w/10 email*	0
(Matt Derstine) w/10 e-mail*	0
(Matt Derstine) w/10 evaluat*	0
(Matt Derstine) w/10 plan	0
(Matt Derstine) w/10 propos*	0
(Matt Derstine) w/10 recommend*	0
(Matt Derstine) w/10 report*	0
(Matt Derstine) w/10 request*	0
(Matt Derstine) w/10 respon*	0
(Matt Derstine) w/10 review	0
(Matt Derstine) w/10 said	0
(Matt Derstine) w/10 say*	0
(Matt Derstine) w/10 spoke*	0
(Matt Derstine) w/10 state*	0
(Matt Derstine) w/10 talk*	0
(Matt Derstine) w/10 tell	0
(Matt Derstine) w/10 told	0
(Matt Derstine) w/10 writ*	0
(Matt Derstine) w/10 wrote	0
(Michael Ledley) and (5 %)	0
(Michael Ledley) and (5 per cent)	0
(Michael Ledley) and (5 percent)	0
(Michael Ledley) and (agent oversight)	0
(Michael Ledley) and (Business Solutions)	0
(Michael Ledley) and (Custom House)	0
(Michael Ledley) and (five per cent)	0
(Michael Ledley) and (five percent)	0
(Michael Ledley) and (Implementation Plan)	0
(Michael Ledley) and (know your agent)	0
(Michael Ledley) and (money order)	0
(Michael Ledley) and (Periodic Review*)	0
(Michael Ledley) and (pre-paid)	0

Search Term	Count
(Michael Ledley) and (risk assessment*)	0
(Michael Ledley) and (Western Union Business Solutions)	0
(Michael Ledley) and (WU Business Solutions)	0
(Michael Ledley) and 5%	0
(Michael Ledley) and interdict*	0
(Michael Ledley) and KYA	0
(Michael Ledley) and MIP*	0
(Michael Ledley) and prepaid	0
(Michael Ledley) and Recommendation*	0
(Michael Ledley) and Travelex	0
(Michael Ledley) and WUBS	0
(Michael Ledley) w/10 ask*	0
(Michael Ledley) w/10 call*	0
(Michael Ledley) w/10 demand*	0
(Michael Ledley) w/10 email*	0
(Michael Ledley) w/10 e-mail*	0
(Michael Ledley) w/10 evaluat*	0
(Michael Ledley) w/10 plan	0
(Michael Ledley) w/10 propos*	0
(Michael Ledley) w/10 recommend*	0
(Michael Ledley) w/10 report*	0
(Michael Ledley) w/10 request*	0
(Michael Ledley) w/10 respon*	0
(Michael Ledley) w/10 review	0
(Michael Ledley) w/10 said	0
(Michael Ledley) w/10 say*	0
(Michael Ledley) w/10 spoke*	0
(Michael Ledley) w/10 state*	0
(Michael Ledley) w/10 talk*	0
(Michael Ledley) w/10 tell	0
(Michael Ledley) w/10 told	0
(Michael Ledley) w/10 writ*	0
(Michael Ledley) w/10 wrote	0
(Nick Nahas) and (5 %)	0
(Nick Nahas) and (5 per cent)	0
(Nick Nahas) and (5 percent)	0
(Nick Nahas) and (agent oversight)	0
(Nick Nahas) and (Business Solutions)	0
(Nick Nahas) and (Custom House)	0
(Nick Nahas) and (five per cent)	0
(Nick Nahas) and (five percent)	0
(Nick Nahas) and (Implementation Plan)	0
(Nick Nahas) and (know your agent)	0
(Nick Nahas) and (money order)	0
(Nick Nahas) and (Periodic Review*)	0
(Nick Nahas) and (pre-paid)	0
(Nick Nahas) and (risk assessment*)	0
(Nick Nahas) and (Western Union Business Solutions)	0
(Nick Nahas) and (WU Business Solutions)	0
(Nick Nahas) and 5%	0
(Nick Nahas) and interdict*	0
(Nick Nahas) and KYA	0
(Nick Nahas) and MIP*	0
(Nick Nahas) and prepaid	0
(Nick Nahas) and Recommendation*	0
(Nick Nahas) and Travelex	0
(Nick Nahas) and WUBS	0
(Nick Nahas) w/10 ask*	0
(Nick Nahas) w/10 call*	0
(Nick Nahas) w/10 demand*	0
(Nick Nahas) w/10 email*	0
(Nick Nahas) w/10 e-mail*	0
(Nick Nahas) w/10 evaluat*	0
(Nick Nahas) w/10 plan	0
(Nick Nahas) w/10 propos*	0
(Nick Nahas) w/10 recommend*	0
(Nick Nahas) w/10 report*	0
(Nick Nahas) w/10 request*	0
(Nick Nahas) w/10 respon*	0

Search Term	Count
(Nick Nahas) w/10 review	0
(Nick Nahas) w/10 said	0
(Nick Nahas) w/10 say*	0
(Nick Nahas) w/10 spoke*	0
(Nick Nahas) w/10 state*	0
(Nick Nahas) w/10 talk*	0
(Nick Nahas) w/10 tell	0
(Nick Nahas) w/10 told	0
(Nick Nahas) w/10 writ*	0
(Nick Nahas) w/10 wrote	0
(Patrick Mahon) and (5 %)	0
(Patrick Mahon) and (5 per cent)	0
(Patrick Mahon) and (5 percent)	0
(Patrick Mahon) and (agent oversight)	0
(Patrick Mahon) and (Business Solutions)	0
(Patrick Mahon) and (Custom House)	0
(Patrick Mahon) and (five per cent)	0
(Patrick Mahon) and (five percent)	0
(Patrick Mahon) and (Implementation Plan)	0
(Patrick Mahon) and (know your agent)	0
(Patrick Mahon) and (money order)	0
(Patrick Mahon) and (Periodic Review*)	0
(Patrick Mahon) and (pre-paid)	0
(Patrick Mahon) and (risk assessment*)	0
(Patrick Mahon) and (Western Union Business Solutions)	0
(Patrick Mahon) and (WU Business Solutions)	0
(Patrick Mahon) and 5%	0
(Patrick Mahon) and interdict*	0
(Patrick Mahon) and KYA	0
(Patrick Mahon) and MIP*	0
(Patrick Mahon) and prepaid	0
(Patrick Mahon) and Recommendation*	0
(Patrick Mahon) and Travelex	0
(Patrick Mahon) and WUBS	0
(Patrick Mahon) w/10 ask*	0
(Patrick Mahon) w/10 call*	0
(Patrick Mahon) w/10 demand*	0
(Patrick Mahon) w/10 email*	0
(Patrick Mahon) w/10 e-mail*	0
(Patrick Mahon) w/10 evaluat*	0
(Patrick Mahon) w/10 plan	0
(Patrick Mahon) w/10 propos*	0
(Patrick Mahon) w/10 recommend*	0
(Patrick Mahon) w/10 report*	0
(Patrick Mahon) w/10 request*	0
(Patrick Mahon) w/10 respon*	0
(Patrick Mahon) w/10 review	0
(Patrick Mahon) w/10 said	0
(Patrick Mahon) w/10 say*	0
(Patrick Mahon) w/10 spoke*	0
(Patrick Mahon) w/10 state*	0
(Patrick Mahon) w/10 talk*	0
(Patrick Mahon) w/10 tell	0
(Patrick Mahon) w/10 told	0
(Patrick Mahon) w/10 writ*	0
(Patrick Mahon) w/10 wrote	0
(Paul Lewis) and (5 %)	0
(Paul Lewis) and (5 per cent)	0
(Paul Lewis) and (5 percent)	0
(Paul Lewis) and (agent oversight)	0
(Paul Lewis) and (Business Solutions)	0
(Paul Lewis) and (Custom House)	0
(Paul Lewis) and (five per cent)	0
(Paul Lewis) and (five percent)	0
(Paul Lewis) and (Implementation Plan)	0
(Paul Lewis) and (know your agent)	0
(Paul Lewis) and (money order)	0
(Paul Lewis) and (Periodic Review*)	0
(Paul Lewis) and (pre-paid)	0

Search Term	Count
(Paul Lewis) and (risk assessment*)	0
(Paul Lewis) and (Western Union Business Solutions)	0
(Paul Lewis) and (WU Business Solutions)	0
(Paul Lewis) and 5%	0
(Paul Lewis) and interdict*	0
(Paul Lewis) and KYA	0
(Paul Lewis) and MIP*	0
(Paul Lewis) and prepaid	0
(Paul Lewis) and Recommendation*	0
(Paul Lewis) and Travelex	0
(Paul Lewis) and WUBS	0
(Paul Lewis) w/10 ask*	0
(Paul Lewis) w/10 call*	0
(Paul Lewis) w/10 demand*	0
(Paul Lewis) w/10 email*	0
(Paul Lewis) w/10 e-mail*	0
(Paul Lewis) w/10 evaluat*	0
(Paul Lewis) w/10 plan	0
(Paul Lewis) w/10 propos*	0
(Paul Lewis) w/10 recommend*	0
(Paul Lewis) w/10 report*	1
(Paul Lewis) w/10 request*	0
(Paul Lewis) w/10 respon*	0
(Paul Lewis) w/10 review	0
(Paul Lewis) w/10 said	0
(Paul Lewis) w/10 say*	0
(Paul Lewis) w/10 spoke*	0
(Paul Lewis) w/10 state*	0
(Paul Lewis) w/10 talk*	0
(Paul Lewis) w/10 tell	0
(Paul Lewis) w/10 told	0
(Paul Lewis) w/10 writ*	0
(Paul Lewis) w/10 wrote	0
(Rachele Byrne) and (5 %)	0
(Rachele Byrne) and (5 per cent)	0
(Rachele Byrne) and (5 percent)	0
(Rachele Byrne) and (agent oversight)	0
(Rachele Byrne) and (Business Solutions)	0
(Rachele Byrne) and (Custom House)	0
(Rachele Byrne) and (five per cent)	0
(Rachele Byrne) and (five percent)	0
(Rachele Byrne) and (Implementation Plan)	0
(Rachele Byrne) and (know your agent)	0
(Rachele Byrne) and (money order)	0
(Rachele Byrne) and (Periodic Review*)	0
(Rachele Byrne) and (pre-paid)	0
(Rachele Byrne) and (risk assessment*)	0
(Rachele Byrne) and (Western Union Business Solutions)	0
(Rachele Byrne) and (WU Business Solutions)	0
(Rachele Byrne) and 5%	0
(Rachele Byrne) and interdict*	0
(Rachele Byrne) and KYA	0
(Rachele Byrne) and MIP*	0
(Rachele Byrne) and prepaid	0
(Rachele Byrne) and Recommendation*	0
(Rachele Byrne) and Travelex	0
(Rachele Byrne) and WUBS	0
(Rachele Byrne) w/10 ask*	0
(Rachele Byrne) w/10 call*	0
(Rachele Byrne) w/10 demand*	0
(Rachele Byrne) w/10 email*	0
(Rachele Byrne) w/10 e-mail*	0
(Rachele Byrne) w/10 evaluat*	0
(Rachele Byrne) w/10 plan	0
(Rachele Byrne) w/10 propos*	0
(Rachele Byrne) w/10 recommend*	0
(Rachele Byrne) w/10 report*	0
(Rachele Byrne) w/10 request*	0
(Rachele Byrne) w/10 respon*	0

Search Term	Count
(Rachele Byrne) w/10 review	0
(Rachele Byrne) w/10 said	0
(Rachele Byrne) w/10 say*	0
(Rachele Byrne) w/10 spoke*	0
(Rachele Byrne) w/10 state*	0
(Rachele Byrne) w/10 talk*	0
(Rachele Byrne) w/10 tell	0
(Rachele Byrne) w/10 told	0
(Rachele Byrne) w/10 writ*	0
(Rachele Byrne) w/10 wrote	0
(Reynold Benjamin) and (5 %)	0
(Reynold Benjamin) and (5 per cent)	0
(Reynold Benjamin) and (5 percent)	0
(Reynold Benjamin) and (agent oversight)	0
(Reynold Benjamin) and (Business Solutions)	0
(Reynold Benjamin) and (Custom House)	0
(Reynold Benjamin) and (five per cent)	0
(Reynold Benjamin) and (five percent)	0
(Reynold Benjamin) and (Implementation Plan)	0
(Reynold Benjamin) and (know your agent)	0
(Reynold Benjamin) and (money order)	0
(Reynold Benjamin) and (Periodic Review*)	0
(Reynold Benjamin) and (pre-paid)	0
(Reynold Benjamin) and (risk assessment*)	0
(Reynold Benjamin) and (Western Union Business Solutions)	0
(Reynold Benjamin) and (WU Business Solutions)	0
(Reynold Benjamin) and 5%	0
(Reynold Benjamin) and interdict*	0
(Reynold Benjamin) and KYA	0
(Reynold Benjamin) and MIP*	0
(Reynold Benjamin) and prepaid	0
(Reynold Benjamin) and Recommendation*	0
(Reynold Benjamin) and Travelex	0
(Reynold Benjamin) and WUBS	0
(Reynold Benjamin) w/10 ask*	0
(Reynold Benjamin) w/10 call*	0
(Reynold Benjamin) w/10 demand*	0
(Reynold Benjamin) w/10 email*	0
(Reynold Benjamin) w/10 e-mail*	0
(Reynold Benjamin) w/10 evaluat*	0
(Reynold Benjamin) w/10 plan	0
(Reynold Benjamin) w/10 propos*	0
(Reynold Benjamin) w/10 recommend*	0
(Reynold Benjamin) w/10 report*	0
(Reynold Benjamin) w/10 request*	0
(Reynold Benjamin) w/10 respon*	0
(Reynold Benjamin) w/10 review	0
(Reynold Benjamin) w/10 said	0
(Reynold Benjamin) w/10 say*	0
(Reynold Benjamin) w/10 spoke*	0
(Reynold Benjamin) w/10 state*	0
(Reynold Benjamin) w/10 talk*	0
(Reynold Benjamin) w/10 tell	0
(Reynold Benjamin) w/10 told	0
(Reynold Benjamin) w/10 writ*	0
(Reynold Benjamin) w/10 wrote	0
(Ricki Conrey) and (5 %)	0
(Ricki Conrey) and (5 per cent)	0
(Ricki Conrey) and (5 percent)	0
(Ricki Conrey) and (agent oversight)	0
(Ricki Conrey) and (Business Solutions)	0
(Ricki Conrey) and (Custom House)	0
(Ricki Conrey) and (five per cent)	0
(Ricki Conrey) and (five percent)	0
(Ricki Conrey) and (Implementation Plan)	0
(Ricki Conrey) and (know your agent)	0
(Ricki Conrey) and (money order)	0
(Ricki Conrey) and (Periodic Review*)	0
(Ricki Conrey) and (pre-paid)	0

Search Term	Count
(Ricki Conrey) and (risk assessment*)	0
(Ricki Conrey) and (Western Union Business Solutions)	0
(Ricki Conrey) and (WU Business Solutions)	0
(Ricki Conrey) and 5%	0
(Ricki Conrey) and interdict*	0
(Ricki Conrey) and KYA	0
(Ricki Conrey) and MIP*	0
(Ricki Conrey) and prepaid	0
(Ricki Conrey) and Recommendation*	0
(Ricki Conrey) and Travelex	0
(Ricki Conrey) and WUBS	0
(Ricki Conrey) w/10 ask*	0
(Ricki Conrey) w/10 call*	0
(Ricki Conrey) w/10 demand*	0
(Ricki Conrey) w/10 email*	0
(Ricki Conrey) w/10 e-mail*	0
(Ricki Conrey) w/10 evaluat*	0
(Ricki Conrey) w/10 plan	0
(Ricki Conrey) w/10 propos*	0
(Ricki Conrey) w/10 recommend*	0
(Ricki Conrey) w/10 report*	0
(Ricki Conrey) w/10 request*	0
(Ricki Conrey) w/10 respon*	0
(Ricki Conrey) w/10 review	0
(Ricki Conrey) w/10 said	0
(Ricki Conrey) w/10 say*	0
(Ricki Conrey) w/10 spoke*	0
(Ricki Conrey) w/10 state*	0
(Ricki Conrey) w/10 talk*	0
(Ricki Conrey) w/10 tell	0
(Ricki Conrey) w/10 told	0
(Ricki Conrey) w/10 writ*	0
(Ricki Conrey) w/10 wrote	0
(Robert Silbering) and (5 %)	0
(Robert Silbering) and (5 per cent)	0
(Robert Silbering) and (5 percent)	0
(Robert Silbering) and (agent oversight)	0
(Robert Silbering) and (Business Solutions)	0
(Robert Silbering) and (Custom House)	0
(Robert Silbering) and (five per cent)	0
(Robert Silbering) and (five percent)	0
(Robert Silbering) and (Implementation Plan)	0
(Robert Silbering) and (know your agent)	0
(Robert Silbering) and (money order)	0
(Robert Silbering) and (Periodic Review*)	0
(Robert Silbering) and (pre-paid)	0
(Robert Silbering) and (risk assessment*)	0
(Robert Silbering) and (Western Union Business Solutions)	0
(Robert Silbering) and (WU Business Solutions)	0
(Robert Silbering) and 5%	0
(Robert Silbering) and interdict*	0
(Robert Silbering) and KYA	0
(Robert Silbering) and MIP*	0
(Robert Silbering) and prepaid	0
(Robert Silbering) and Recommendation*	0
(Robert Silbering) and Travelex	0
(Robert Silbering) and WUBS	0
(Robert Silbering) w/10 ask*	0
(Robert Silbering) w/10 call*	0
(Robert Silbering) w/10 demand*	0
(Robert Silbering) w/10 email*	0
(Robert Silbering) w/10 e-mail*	0
(Robert Silbering) w/10 evaluat*	0
(Robert Silbering) w/10 plan	0
(Robert Silbering) w/10 propos*	0
(Robert Silbering) w/10 recommend*	0
(Robert Silbering) w/10 report*	0
(Robert Silbering) w/10 request*	0
(Robert Silbering) w/10 respon*	0

Search Term	Count
(Robert Silbering) w/10 review	0
(Robert Silbering) w/10 said	0
(Robert Silbering) w/10 say*	0
(Robert Silbering) w/10 spoke*	0
(Robert Silbering) w/10 state*	0
(Robert Silbering) w/10 talk*	0
(Robert Silbering) w/10 tell	0
(Robert Silbering) w/10 told	0
(Robert Silbering) w/10 writ*	0
(Robert Silbering) w/10 wrote	0
(Sarah Schuyler) and (5 %)	0
(Sarah Schuyler) and (5 per cent)	0
(Sarah Schuyler) and (5 percent)	0
(Sarah Schuyler) and (agent oversight)	0
(Sarah Schuyler) and (Business Solutions)	0
(Sarah Schuyler) and (Custom House)	0
(Sarah Schuyler) and (five per cent)	0
(Sarah Schuyler) and (five percent)	0
(Sarah Schuyler) and (Implementation Plan)	0
(Sarah Schuyler) and (know your agent)	0
(Sarah Schuyler) and (money order)	0
(Sarah Schuyler) and (Periodic Review*)	0
(Sarah Schuyler) and (pre-paid)	0
(Sarah Schuyler) and (risk assessment*)	0
(Sarah Schuyler) and (Western Union Business Solutions)	0
(Sarah Schuyler) and (WU Business Solutions)	0
(Sarah Schuyler) and 5%	0
(Sarah Schuyler) and interdict*	0
(Sarah Schuyler) and KYA	0
(Sarah Schuyler) and MIP*	0
(Sarah Schuyler) and prepaid	0
(Sarah Schuyler) and Recommendation*	0
(Sarah Schuyler) and Travelex	0
(Sarah Schuyler) and WUBS	0
(Sarah Schuyler) w/10 ask*	0
(Sarah Schuyler) w/10 call*	0
(Sarah Schuyler) w/10 demand*	0
(Sarah Schuyler) w/10 email*	0
(Sarah Schuyler) w/10 e-mail*	0
(Sarah Schuyler) w/10 evaluat*	0
(Sarah Schuyler) w/10 plan	0
(Sarah Schuyler) w/10 propos*	0
(Sarah Schuyler) w/10 recommend*	0
(Sarah Schuyler) w/10 report*	0
(Sarah Schuyler) w/10 request*	0
(Sarah Schuyler) w/10 respon*	0
(Sarah Schuyler) w/10 review	0
(Sarah Schuyler) w/10 said	0
(Sarah Schuyler) w/10 say*	0
(Sarah Schuyler) w/10 spoke*	0
(Sarah Schuyler) w/10 state*	0
(Sarah Schuyler) w/10 talk*	0
(Sarah Schuyler) w/10 tell	0
(Sarah Schuyler) w/10 told	0
(Sarah Schuyler) w/10 writ*	0
(Sarah Schuyler) w/10 wrote	0
(Steven Escaravage) and (5 %)	0
(Steven Escaravage) and (5 per cent)	0
(Steven Escaravage) and (5 percent)	0
(Steven Escaravage) and (agent oversight)	0
(Steven Escaravage) and (Business Solutions)	0
(Steven Escaravage) and (Custom House)	0
(Steven Escaravage) and (five per cent)	0
(Steven Escaravage) and (five percent)	0
(Steven Escaravage) and (Implementation Plan)	0
(Steven Escaravage) and (know your agent)	0
(Steven Escaravage) and (money order)	0
(Steven Escaravage) and (Periodic Review*)	0
(Steven Escaravage) and (pre-paid)	0

Search Term	Count
(Steven Escaravage) and (risk assessment*)	0
(Steven Escaravage) and (Western Union Business Solutions)	0
(Steven Escaravage) and (WU Business Solutions)	0
(Steven Escaravage) and 5%	0
(Steven Escaravage) and interdict*	0
(Steven Escaravage) and KYA	0
(Steven Escaravage) and MIP*	0
(Steven Escaravage) and prepaid	0
(Steven Escaravage) and Recommendation*	0
(Steven Escaravage) and Travelex	0
(Steven Escaravage) and WUBS	0
(Steven Escaravage) w/10 ask*	0
(Steven Escaravage) w/10 call*	0
(Steven Escaravage) w/10 demand*	0
(Steven Escaravage) w/10 email*	0
(Steven Escaravage) w/10 e-mail*	0
(Steven Escaravage) w/10 evaluat*	0
(Steven Escaravage) w/10 plan	0
(Steven Escaravage) w/10 propos*	0
(Steven Escaravage) w/10 recommend*	0
(Steven Escaravage) w/10 report*	0
(Steven Escaravage) w/10 request*	0
(Steven Escaravage) w/10 respon*	0
(Steven Escaravage) w/10 review	0
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(Steven Escaravage) w/10 say*	0
(Steven Escaravage) w/10 spoke*	0
(Steven Escaravage) w/10 state*	0
(Steven Escaravage) w/10 talk*	0
(Steven Escaravage) w/10 tell	0
(Steven Escaravage) w/10 told	0
(Steven Escaravage) w/10 writ*	0
(Steven Escaravage) w/10 wrote	0
(Ted Greenberg) and (5 %)	0
(Ted Greenberg) and (5 per cent)	0
(Ted Greenberg) and (5 percent)	0
(Ted Greenberg) and (agent oversight)	0
(Ted Greenberg) and (Business Solutions)	0
(Ted Greenberg) and (Custom House)	0
(Ted Greenberg) and (five per cent)	0
(Ted Greenberg) and (five percent)	0
(Ted Greenberg) and (Implementation Plan)	0
(Ted Greenberg) and (know your agent)	0
(Ted Greenberg) and (money order)	0
(Ted Greenberg) and (Periodic Review*)	0
(Ted Greenberg) and (pre-paid)	0
(Ted Greenberg) and (risk assessment*)	0
(Ted Greenberg) and (Western Union Business Solutions)	0
(Ted Greenberg) and (WU Business Solutions)	0
(Ted Greenberg) and 5%	0
(Ted Greenberg) and interdict*	0
(Ted Greenberg) and KYA	0
(Ted Greenberg) and MIP*	0
(Ted Greenberg) and prepaid	0
(Ted Greenberg) and Recommendation*	0
(Ted Greenberg) and Travelex	0
(Ted Greenberg) and WUBS	0
(Ted Greenberg) w/10 ask*	0
(Ted Greenberg) w/10 call*	0
(Ted Greenberg) w/10 demand*	0
(Ted Greenberg) w/10 email*	0
(Ted Greenberg) w/10 e-mail*	0
(Ted Greenberg) w/10 evaluat*	0
(Ted Greenberg) w/10 plan	0
(Ted Greenberg) w/10 propos*	0
(Ted Greenberg) w/10 recommend*	0
(Ted Greenberg) w/10 report*	0
(Ted Greenberg) w/10 request*	0
(Ted Greenberg) w/10 respon*	0

Search Term	Count
(Ted Greenberg) w/10 review	0
(Ted Greenberg) w/10 said	0
(Ted Greenberg) w/10 say*	0
(Ted Greenberg) w/10 spoke*	0
(Ted Greenberg) w/10 state*	0
(Ted Greenberg) w/10 talk*	0
(Ted Greenberg) w/10 tell	0
(Ted Greenberg) w/10 told	0
(Ted Greenberg) w/10 writ*	0
(Ted Greenberg) w/10 wrote	0
(WUmonitor@gmail com) and (5 %)	0
(WUmonitor@gmail com) and (5 per cent)	0
(WUmonitor@gmail com) and (5 percent)	0
(WUmonitor@gmail com) and (agent oversight)	0
(WUmonitor@gmail com) and (Business Solutions)	0
(WUmonitor@gmail com) and (Custom House)	0
(WUmonitor@gmail com) and (five per cent)	0
(WUmonitor@gmail com) and (five percent)	0
(WUmonitor@gmail com) and (Implementation Plan)	0
(WUmonitor@gmail com) and (know your agent)	0
(WUmonitor@gmail com) and (money order)	0
(WUmonitor@gmail com) and (Periodic Review*)	0
(WUmonitor@gmail com) and (pre-paid)	0
(WUmonitor@gmail com) and (risk assessment*)	0
(WUmonitor@gmail com) and (Western Union Business Solutions)	0
(WUmonitor@gmail com) and (WU Business Solutions)	0
(WUmonitor@gmail com) and 5%	0
(WUmonitor@gmail com) and interdict*	0
(WUmonitor@gmail com) and KYA	0
(WUmonitor@gmail com) and MIP*	0
(WUmonitor@gmail com) and prepaid	0
(WUmonitor@gmail com) and Recommendation*	0
(WUmonitor@gmail com) and Travelex	0
(WUmonitor@gmail com) and WUBS	0
(WUmonitor@gmail com) w/10 ask*	0
(WUmonitor@gmail com) w/10 call*	0
(WUmonitor@gmail com) w/10 demand*	0
(WUmonitor@gmail com) w/10 email*	0
(WUmonitor@gmail com) w/10 e-mail*	0
(WUmonitor@gmail com) w/10 evaluat*	0
(WUmonitor@gmail com) w/10 plan	0
(WUmonitor@gmail com) w/10 propos*	0
(WUmonitor@gmail com) w/10 recommend*	0
(WUmonitor@gmail com) w/10 report*	0
(WUmonitor@gmail com) w/10 request*	0
(WUmonitor@gmail com) w/10 respon*	0
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(WUmonitor@gmail com) w/10 told	0
(WUmonitor@gmail com) w/10 writ*	0
(WUmonitor@gmail com) w/10 wrote	0
(WUmonitor2012@gmail com) and (5 %)	0
(WUmonitor2012@gmail com) and (5 per cent)	0
(WUmonitor2012@gmail com) and (5 percent)	0
(WUmonitor2012@gmail com) and (agent oversight)	0
(WUmonitor2012@gmail com) and (Business Solutions)	0
(WUmonitor2012@gmail com) and (Custom House)	0
(WUmonitor2012@gmail com) and (five per cent)	0
(WUmonitor2012@gmail com) and (five percent)	0
(WUmonitor2012@gmail com) and (Implementation Plan)	0
(WUmonitor2012@gmail com) and (know your agent)	0
(WUmonitor2012@gmail com) and (money order)	0
(WUmonitor2012@gmail com) and (Periodic Review*)	0
(WUmonitor2012@gmail com) and (pre-paid)	0

Search Term	Count
(WUmonitor2012@gmail.com) and (risk assessment*)	0
(WUmonitor2012@gmail.com) and (Western Union Business Solutions)	0
(WUmonitor2012@gmail.com) and (WU Business Solutions)	0
(WUmonitor2012@gmail.com) and 5%	0
(WUmonitor2012@gmail.com) and interdict*	0
(WUmonitor2012@gmail.com) and KYA	0
(WUmonitor2012@gmail.com) and MIP*	0
(WUmonitor2012@gmail.com) and prepaid	0
(WUmonitor2012@gmail.com) and Recommendation*	0
(WUmonitor2012@gmail.com) and Travelex	0
(WUmonitor2012@gmail.com) and WUBS	0
(WUmonitor2012@gmail.com) w/10 ask*	0
(WUmonitor2012@gmail.com) w/10 call*	0
(WUmonitor2012@gmail.com) w/10 demand*	0
(WUmonitor2012@gmail.com) w/10 email*	0
(WUmonitor2012@gmail.com) w/10 e-mail*	0
(WUmonitor2012@gmail.com) w/10 evaluat*	0
(WUmonitor2012@gmail.com) w/10 plan	0
(WUmonitor2012@gmail.com) w/10 propos*	0
(WUmonitor2012@gmail.com) w/10 recommend*	0
(WUmonitor2012@gmail.com) w/10 report*	0
(WUmonitor2012@gmail.com) w/10 request*	0
(WUmonitor2012@gmail.com) w/10 respon*	0
(WUmonitor2012@gmail.com) w/10 review	0
(WUmonitor2012@gmail.com) w/10 said	0
(WUmonitor2012@gmail.com) w/10 say*	0
(WUmonitor2012@gmail.com) w/10 spoke*	0
(WUmonitor2012@gmail.com) w/10 state*	0
(WUmonitor2012@gmail.com) w/10 talk*	0
(WUmonitor2012@gmail.com) w/10 tell	0
(WUmonitor2012@gmail.com) w/10 told	0
(WUmonitor2012@gmail.com) w/10 writ*	0
(WUmonitor2012@gmail.com) w/10 wrote	0
(Wyn Clark) and (5 %)	0
(Wyn Clark) and (5 per cent)	0
(Wyn Clark) and (5 percent)	0
(Wyn Clark) and (agent oversight)	0
(Wyn Clark) and (Business Solutions)	0
(Wyn Clark) and (Custom House)	0
(Wyn Clark) and (five per cent)	0
(Wyn Clark) and (five percent)	0
(Wyn Clark) and (Implementation Plan)	0
(Wyn Clark) and (know your agent)	0
(Wyn Clark) and (money order)	0
(Wyn Clark) and (Periodic Review*)	0
(Wyn Clark) and (pre-paid)	0
(Wyn Clark) and (risk assessment*)	0
(Wyn Clark) and (Western Union Business Solutions)	0
(Wyn Clark) and (WU Business Solutions)	0
(Wyn Clark) and 5%	0
(Wyn Clark) and interdict*	0
(Wyn Clark) and KYA	0
(Wyn Clark) and MIP*	0
(Wyn Clark) and prepaid	0
(Wyn Clark) and Recommendation*	0
(Wyn Clark) and Travelex	0
(Wyn Clark) and WUBS	0
(Wyn Clark) w/10 ask*	0
(Wyn Clark) w/10 call*	0
(Wyn Clark) w/10 demand*	0
(Wyn Clark) w/10 email*	0
(Wyn Clark) w/10 e-mail*	0
(Wyn Clark) w/10 evaluat*	0
(Wyn Clark) w/10 plan	0
(Wyn Clark) w/10 propos*	0
(Wyn Clark) w/10 recommend*	0
(Wyn Clark) w/10 report*	0
(Wyn Clark) w/10 request*	0
(Wyn Clark) w/10 respon*	0

Search Term	Count
(Wyn Clark) w/10 review	0
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(Wyn Clark) w/10 say*	0
(Wyn Clark) w/10 spoke*	0
(Wyn Clark) w/10 state*	0
(Wyn Clark) w/10 talk*	0
(Wyn Clark) w/10 tell	0
(Wyn Clark) w/10 told	0
(Wyn Clark) w/10 writ*	0
(Wyn Clark) w/10 wrote	0
*@WUmonitor.com	0
Dennis Lormel	0
Douglas Meadows	0
Ernest Sohn	0
JD Hannick	0
Jeff Hunter	0
John Bell	0
John De Wulf	0
John Knapp	0
Lisa Dawson	0
Lonnie Keene	4
Matt Derstine	0
Michael Ledley	0
Nick Nahas	0
Patrick Mahon	0
Paul Lewis	1
Rachele Byrne	0
Reynold Benjamin	0
Ricki Conrey	0
Robert Silbering	0
Sarah Schuyler	0
Steven Escaravage	0
Ted Greenberg	0
WUmonitor@gmail.com	0
WUmonitor2012@gmail.com	0
Wyn Clark	0
Entire Set	1542

Search Term	Count
"Greenberg"	454
"Greenberg" and (5 %)	0
"Greenberg" and (5 per cent)	0
"Greenberg" and (5 percent)	4
"Greenberg" and (agent oversight)	0
"Greenberg" and (Business Solutions)	45
"Greenberg" and (Custom House)	132
"Greenberg" and (five per cent)	0
"Greenberg" and (five percent)	0
"Greenberg" and (Implementation Plan)	1
"Greenberg" and (know your agent)	0
"Greenberg" and (money order)	21
"Greenberg" and (Periodic Review*)	4
"Greenberg" and (pre-paid)	16
"Greenberg" and (risk assessment*)	48
"Greenberg" and (Western Union Business Solutions)	45
"Greenberg" and (WU Business Solutions)	0
"Greenberg" and 5%	343
"Greenberg" and interdict*	239
"Greenberg" and KYA	32
"Greenberg" and MIP*	24
"Greenberg" and prepaid	33
"Greenberg" and Recommendation*	39
"Greenberg" and Travelex	83
"Greenberg" and WUBS	34
"Greenberg" w/10 ask*	0
"Greenberg" w/10 call*	16
"Greenberg" w/10 demand*	0
"Greenberg" w/10 email*	9
"Greenberg" w/10 e-mail*	0
"Greenberg" w/10 evaluat*	0
"Greenberg" w/10 plan	0
"Greenberg" w/10 propos*	11
"Greenberg" w/10 recommend*	2
"Greenberg" w/10 report*	4
"Greenberg" w/10 request*	0
"Greenberg" w/10 respon*	14
"Greenberg" w/10 review	3
"Greenberg" w/10 said	0
"Greenberg" w/10 say*	0
"Greenberg" w/10 spoke*	0
"Greenberg" w/10 state*	96
"Greenberg" w/10 talk*	0
"Greenberg" w/10 tell	0
"Greenberg" w/10 told	0
"Greenberg" w/10 writ*	13
"Greenberg" w/10 wrote	0
"Keene"	182
"Keene" and (5 %)	0
"Keene" and (5 per cent)	0
"Keene" and (5 percent)	0
"Keene" and (agent oversight)	0
"Keene" and (Business Solutions)	4
"Keene" and (Custom House)	50
"Keene" and (five per cent)	0
"Keene" and (five percent)	0
"Keene" and (Implementation Plan)	1
"Keene" and (know your agent)	1
"Keene" and (money order)	34
"Keene" and (Periodic Review*)	1
"Keene" and (pre-paid)	1
"Keene" and (risk assessment*)	8
"Keene" and (Western Union Business Solutions)	0
"Keene" and (WU Business Solutions)	3
"Keene" and 5%	155
"Keene" and interdict*	69
"Keene" and KYA	7
"Keene" and MIP*	14
"Keene" and prepaid	31

Search Term	Count
"Keene" and Recommendation*	4
"Keene" and Travelex	79
"Keene" and WUBS	0
"Keene" w/10 ask*	0
"Keene" w/10 call*	1
"Keene" w/10 demand*	0
"Keene" w/10 email*	0
"Keene" w/10 e-mail*	0
"Keene" w/10 evaluat*	1
"Keene" w/10 plan	1
"Keene" w/10 propos*	0
"Keene" w/10 recommend*	1
"Keene" w/10 report*	0
"Keene" w/10 request*	0
"Keene" w/10 respon*	0
"Keene" w/10 review	1
"Keene" w/10 said	0
"Keene" w/10 say*	0
"Keene" w/10 spoke*	0
"Keene" w/10 state*	90
"Keene" w/10 talk*	0
"Keene" w/10 tell	0
"Keene" w/10 told	0
"Keene" w/10 writ*	0
"Keene" w/10 wrote	0
"Lonnie"	423
"Lonnie" and (5 %)	0
"Lonnie" and (5 per cent)	0
"Lonnie" and (5 percent)	0
"Lonnie" and (agent oversight)	0
"Lonnie" and (Business Solutions)	11
"Lonnie" and (Custom House)	49
"Lonnie" and (five per cent)	0
"Lonnie" and (five percent)	0
"Lonnie" and (Implementation Plan)	10
"Lonnie" and (know your agent)	9
"Lonnie" and (money order)	39
"Lonnie" and (Periodic Review*)	15
"Lonnie" and (pre-paid)	15
"Lonnie" and (risk assessment*)	50
"Lonnie" and (Western Union Business Solutions)	10
"Lonnie" and (WU Business Solutions)	0
"Lonnie" and 5%	251
"Lonnie" and interdict*	259
"Lonnie" and KYA	17
"Lonnie" and MIP*	27
"Lonnie" and prepaid	54
"Lonnie" and Recommendation*	70
"Lonnie" and Travelex	60
"Lonnie" and WUBS	19
"Lonnie" w/10 ask*	9
"Lonnie" w/10 call*	22
"Lonnie" w/10 demand*	0
"Lonnie" w/10 email*	4
"Lonnie" w/10 e-mail*	0
"Lonnie" w/10 evaluat*	1
"Lonnie" w/10 plan	29
"Lonnie" w/10 propos*	10
"Lonnie" w/10 recommend*	19
"Lonnie" w/10 report*	3
"Lonnie" w/10 request*	51
"Lonnie" w/10 respon*	7
"Lonnie" w/10 review	9
"Lonnie" w/10 said	11
"Lonnie" w/10 say*	2
"Lonnie" w/10 spoke*	0
"Lonnie" w/10 state*	93
"Lonnie" w/10 talk*	23
"Lonnie" w/10 tell	2

Search Term	Count
"Lonnie" w/10 told	4
"Lonnie" w/10 writ*	8
"Lonnie" w/10 wrote	0
"Monitor"	4625
"Monitor" and (5 %)	0
"Monitor" and (5 per cent)	2
"Monitor" and (5 percent)	5
"Monitor" and (agent oversight)	126
"Monitor" and (Business Solutions)	253
"Monitor" and (Custom House)	132
"Monitor" and (five per cent)	0
"Monitor" and (five percent)	7
"Monitor" and (Implementation Plan)	84
"Monitor" and (know your agent)	110
"Monitor" and (money order)	201
"Monitor" and (Periodic Review*)	103
"Monitor" and (pre-paid)	131
"Monitor" and (risk assessment*)	649
"Monitor" and (Western Union Business Solutions)	97
"Monitor" and (WU Business Solutions)	125
"Monitor" and 5%	2420
"Monitor" and interdict*	2140
"Monitor" and KYA	163
"Monitor" and MIP*	137
"Monitor" and prepaid	848
"Monitor" and Recommendation*	899
"Monitor" and Travelex	276
"Monitor" and WUBS	453
"Monitor" w/10 ask*	178
"Monitor" w/10 call*	326
"Monitor" w/10 demand*	5
"Monitor" w/10 email*	88
"Monitor" w/10 e-mail*	19
"Monitor" w/10 evaluat*	170
"Monitor" w/10 plan	197
"Monitor" w/10 propos*	229
"Monitor" w/10 recommend*	376
"Monitor" w/10 report*	543
"Monitor" w/10 request*	327
"Monitor" w/10 respon*	267
"Monitor" w/10 review	496
"Monitor" w/10 said	89
"Monitor" w/10 say*	12
"Monitor" w/10 spoke*	9
"Monitor" w/10 state*	752
"Monitor" w/10 talk*	39
"Monitor" w/10 tell	8
"Monitor" w/10 told	69
"Monitor" w/10 writ*	52
"Monitor" w/10 wrote	9
"Monitorship"	19
"Monitorship" and (5 %)	0
"Monitorship" and (5 per cent)	0
"Monitorship" and (5 percent)	0
"Monitorship" and (agent oversight)	2
"Monitorship" and (Business Solutions)	0
"Monitorship" and (Custom House)	0
"Monitorship" and (five per cent)	0
"Monitorship" and (five percent)	3
"Monitorship" and (Implementation Plan)	0
"Monitorship" and (know your agent)	2
"Monitorship" and (money order)	2
"Monitorship" and (Periodic Review*)	8
"Monitorship" and (pre-paid)	2
"Monitorship" and (risk assessment*)	9
"Monitorship" and (Western Union Business Solutions)	0
"Monitorship" and (WU Business Solutions)	0
"Monitorship" and 5%	16
"Monitorship" and interdict*	2

Search Term	Count
"Monitorship" and KYA	2
"Monitorship" and MIP*	0
"Monitorship" and prepaid	2
"Monitorship" and Recommendation*	9
"Monitorship" and Travelex	0
"Monitorship" and WUBS	2
"Monitorship" w/10 ask*	0
"Monitorship" w/10 call*	0
"Monitorship" w/10 demand*	0
"Monitorship" w/10 email*	0
"Monitorship" w/10 e-mail*	0
"Monitorship" w/10 evaluat*	0
"Monitorship" w/10 plan	1
"Monitorship" w/10 propos*	1
"Monitorship" w/10 recommend*	0
"Monitorship" w/10 report*	5
"Monitorship" w/10 request*	0
"Monitorship" w/10 respon*	3
"Monitorship" w/10 review	0
"Monitorship" w/10 said	0
"Monitorship" w/10 say*	0
"Monitorship" w/10 spoke*	0
"Monitorship" w/10 state*	4
"Monitorship" w/10 talk*	0
"Monitorship" w/10 tell	0
"Monitorship" w/10 told	0
"Monitorship" w/10 writ*	0
"Monitorship" w/10 wrote	0
"SWB Monitor"	429
"SWB Monitor" and (5 %)	0
"SWB Monitor" and (5 per cent)	0
"SWB Monitor" and (5 percent)	0
"SWB Monitor" and (agent oversight)	2
"SWB Monitor" and (Business Solutions)	8
"SWB Monitor" and (Custom House)	2
"SWB Monitor" and (five per cent)	0
"SWB Monitor" and (five percent)	0
"SWB Monitor" and (Implementation Plan)	6
"SWB Monitor" and (know your agent)	8
"SWB Monitor" and (money order)	10
"SWB Monitor" and (Periodic Review*)	4
"SWB Monitor" and (pre-paid)	19
"SWB Monitor" and (risk assessment*)	97
"SWB Monitor" and (Western Union Business Solutions)	6
"SWB Monitor" and (WU Business Solutions)	1
"SWB Monitor" and 5%	242
"SWB Monitor" and interdict*	315
"SWB Monitor" and KYA	41
"SWB Monitor" and MIP*	38
"SWB Monitor" and prepaid	15
"SWB Monitor" and Recommendation*	124
"SWB Monitor" and Travelex	7
"SWB Monitor" and WUBS	57
"SWB Monitor" w/10 ask*	6
"SWB Monitor" w/10 call*	9
"SWB Monitor" w/10 demand*	0
"SWB Monitor" w/10 email*	3
"SWB Monitor" w/10 e-mail*	0
"SWB Monitor" w/10 evaluat*	0
"SWB Monitor" w/10 plan	21
"SWB Monitor" w/10 propos*	13
"SWB Monitor" w/10 recommend*	33
"SWB Monitor" w/10 report*	28
"SWB Monitor" w/10 request*	68
"SWB Monitor" w/10 respon*	6
"SWB Monitor" w/10 review	20
"SWB Monitor" w/10 said	42
"SWB Monitor" w/10 say*	0
"SWB Monitor" w/10 spoke*	0

Search Term	Count
"SWB Monitor" w/10 state*	22
"SWB Monitor" w/10 talk*	0
"SWB Monitor" w/10 tell	0
"SWB Monitor" w/10 told	0
"SWB Monitor" w/10 writ*	14
"SWB Monitor" w/10 wrote	0
"SWBA Monitor"	10
"SWBA Monitor" and (5 %)	0
"SWBA Monitor" and (5 per cent)	0
"SWBA Monitor" and (5 percent)	0
"SWBA Monitor" and (agent oversight)	1
"SWBA Monitor" and (Business Solutions)	0
"SWBA Monitor" and (Custom House)	0
"SWBA Monitor" and (five per cent)	0
"SWBA Monitor" and (five percent)	0
"SWBA Monitor" and (Implementation Plan)	4
"SWBA Monitor" and (know your agent)	5
"SWBA Monitor" and (money order)	5
"SWBA Monitor" and (Periodic Review*)	4
"SWBA Monitor" and (pre-paid)	5
"SWBA Monitor" and (risk assessment*)	5
"SWBA Monitor" and (Western Union Business Solutions)	0
"SWBA Monitor" and (WU Business Solutions)	0
"SWBA Monitor" and 5%	10
"SWBA Monitor" and interdict*	10
"SWBA Monitor" and KYA	5
"SWBA Monitor" and MIP*	1
"SWBA Monitor" and prepaid	5
"SWBA Monitor" and Recommendation*	5
"SWBA Monitor" and Travelex	0
"SWBA Monitor" and WUBS	0
"SWBA Monitor" w/10 ask*	0
"SWBA Monitor" w/10 call*	0
"SWBA Monitor" w/10 demand*	0
"SWBA Monitor" w/10 email*	0
"SWBA Monitor" w/10 e-mail*	0
"SWBA Monitor" w/10 evaluat*	0
"SWBA Monitor" w/10 plan	0
"SWBA Monitor" w/10 propos*	0
"SWBA Monitor" w/10 recommend*	0
"SWBA Monitor" w/10 report*	0
"SWBA Monitor" w/10 request*	0
"SWBA Monitor" w/10 respon*	0
"SWBA Monitor" w/10 review	0
"SWBA Monitor" w/10 said	0
"SWBA Monitor" w/10 say*	0
"SWBA Monitor" w/10 spoke*	0
"SWBA Monitor" w/10 state*	0
"SWBA Monitor" w/10 talk*	0
"SWBA Monitor" w/10 tell	0
"SWBA Monitor" w/10 told	0
"SWBA Monitor" w/10 writ*	0
"SWBA Monitor" w/10 wrote	0
"Ted"	579
"Ted" and (5 %)	0
"Ted" and (5 per cent)	0
"Ted" and (5 percent)	4
"Ted" and (agent oversight)	3
"Ted" and (Business Solutions)	21
"Ted" and (Custom House)	76
"Ted" and (five per cent)	0
"Ted" and (five percent)	0
"Ted" and (Implementation Plan)	5
"Ted" and (know your agent)	4
"Ted" and (money order)	52
"Ted" and (Periodic Review*)	6
"Ted" and (pre-paid)	27
"Ted" and (risk assessment*)	91
"Ted" and (Western Union Business Solutions)	14

Search Term	Count
"Ted" and (WU Business Solutions)	6
"Ted" and 5%	481
"Ted" and interdict*	229
"Ted" and KYA	43
"Ted" and MIP*	66
"Ted" and prepaid	77
"Ted" and Recommendation*	94
"Ted" and Travelex	118
"Ted" and WUBS	83
"Ted" w/10 ask*	26
"Ted" w/10 call*	38
"Ted" w/10 demand*	0
"Ted" w/10 email*	9
"Ted" w/10 e-mail*	0
"Ted" w/10 evaluat*	0
"Ted" w/10 plan	2
"Ted" w/10 propos*	27
"Ted" w/10 recommend*	11
"Ted" w/10 report*	32
"Ted" w/10 request*	45
"Ted" w/10 respon*	19
"Ted" w/10 review	26
"Ted" w/10 said	19
"Ted" w/10 say*	15
"Ted" w/10 spoke*	0
"Ted" w/10 state*	164
"Ted" w/10 talk*	23
"Ted" w/10 tell	0
"Ted" w/10 told	0
"Ted" w/10 writ*	9
"Ted" w/10 wrote	3
"the Monitor"	1254
"the Monitor" and (5 %)	0
"the Monitor" and (5 per cent)	0
"the Monitor" and (5 percent)	0
"the Monitor" and (agent oversight)	38
"the Monitor" and (Business Solutions)	29
"the Monitor" and (Custom House)	39
"the Monitor" and (five per cent)	0
"the Monitor" and (five percent)	3
"the Monitor" and (Implementation Plan)	37
"the Monitor" and (know your agent)	50
"the Monitor" and (money order)	60
"the Monitor" and (Periodic Review*)	65
"the Monitor" and (pre-paid)	74
"the Monitor" and (risk assessment*)	310
"the Monitor" and (Western Union Business Solutions)	22
"the Monitor" and (WU Business Solutions)	0
"the Monitor" and 5%	702
"the Monitor" and interdict*	915
"the Monitor" and KYA	73
"the Monitor" and MIP*	95
"the Monitor" and prepaid	97
"the Monitor" and Recommendation*	440
"the Monitor" and Travelex	39
"the Monitor" and WUBS	151
"the Monitor" w/10 ask*	85
"the Monitor" w/10 call*	70
"the Monitor" w/10 demand*	0
"the Monitor" w/10 email*	12
"the Monitor" w/10 e-mail*	0
"the Monitor" w/10 evaluat*	65
"the Monitor" w/10 plan	98
"the Monitor" w/10 propos*	134
"the Monitor" w/10 recommend*	163
"the Monitor" w/10 report*	149
"the Monitor" w/10 request*	201
"the Monitor" w/10 respon*	74
"the Monitor" w/10 review	186

Search Term	Count
"the Monitor" w/10 said	45
"the Monitor" w/10 say*	1
"the Monitor" w/10 spoke*	5
"the Monitor" w/10 state*	117
"the Monitor" w/10 talk*	29
"the Monitor" w/10 tell	5
"the Monitor" w/10 told	63
"the Monitor" w/10 writ*	10
"the Monitor" w/10 wrote	9
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 %)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 per cent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (5 percent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (agent oversight)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Business Solutions)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Custom House)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (five per cent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (five percent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Implementation Plan)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (know your agent)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (money order)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Periodic Review*)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (pre-paid)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (risk assessment*)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (Western Union Business Solutions)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and (WU Business Solutions)	0
((Frederick R. Kessler) or (Frederick R Kessler)) and 5%	0
((Frederick R. Kessler) or (Frederick R Kessler)) and interdict*	0
((Frederick R. Kessler) or (Frederick R Kessler)) and KYA	0
((Frederick R. Kessler) or (Frederick R Kessler)) and MIP*	0
((Frederick R. Kessler) or (Frederick R Kessler)) and prepaid	0
((Frederick R. Kessler) or (Frederick R Kessler)) and Recommendation*	0
((Frederick R. Kessler) or (Frederick R Kessler)) and Traveler	0
((Frederick R. Kessler) or (Frederick R Kessler)) and WUBS	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 ask*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 call*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 demand*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 email*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 e-mail*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 evaluat*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 plan	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 propos*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 recommend*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 report*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 request*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 respon*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 review	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 said	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 say*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 spoke*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 state*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 talk*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 tell	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 told	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 writ*	0
((Frederick R. Kessler) or (Frederick R Kessler)) w/10 wrote	0
(*@WUmonitor com) and (5 %)	0
(*@WUmonitor com) and (5 per cent)	0
(*@WUmonitor com) and (5 percent)	0
(*@WUmonitor com) and (agent oversight)	0
(*@WUmonitor com) and (Business Solutions)	0
(*@WUmonitor com) and (Custom House)	0
(*@WUmonitor com) and (five per cent)	0
(*@WUmonitor com) and (five percent)	0
(*@WUmonitor com) and (Implementation Plan)	0
(*@WUmonitor com) and (know your agent)	0
(*@WUmonitor com) and (money order)	0
(*@WUmonitor com) and (Periodic Review*)	0
(*@WUmonitor com) and (pre-paid)	0
(*@WUmonitor com) and (risk assessment*)	4

Search Term	Count
(*@WUmonitor com) and (Western Union Business Solutions)	0
(*@WUmonitor com) and (WU Business Solutions)	0
(*@WUmonitor com) and 5%	26
(*@WUmonitor com) and interdict*	32
(*@WUmonitor com) and KYA	0
(*@WUmonitor com) and MIP*	1
(*@WUmonitor com) and prepaid	0
(*@WUmonitor com) and Recommendation*	3
(*@WUmonitor com) and Travelex	0
(*@WUmonitor com) and WUBS	2
(*@WUmonitor com) w/10 ask*	0
(*@WUmonitor com) w/10 call*	1
(*@WUmonitor com) w/10 demand*	0
(*@WUmonitor com) w/10 email*	1
(*@WUmonitor com) w/10 e-mail*	0
(*@WUmonitor com) w/10 evaluat*	0
(*@WUmonitor com) w/10 plan	0
(*@WUmonitor com) w/10 propos*	6
(*@WUmonitor com) w/10 recommend*	0
(*@WUmonitor com) w/10 report*	0
(*@WUmonitor com) w/10 request*	2
(*@WUmonitor com) w/10 respon*	3
(*@WUmonitor com) w/10 review	11
(*@WUmonitor com) w/10 said	0
(*@WUmonitor com) w/10 say*	0
(*@WUmonitor com) w/10 spoke*	0
(*@WUmonitor com) w/10 state*	1
(*@WUmonitor com) w/10 talk*	0
(*@WUmonitor com) w/10 tell	0
(*@WUmonitor com) w/10 told	0
(*@WUmonitor com) w/10 writ*	0
(*@WUmonitor com) w/10 wrote	0
(Dennis Lormel) and (5 %)	0
(Dennis Lormel) and (5 per cent)	0
(Dennis Lormel) and (5 percent)	0
(Dennis Lormel) and (agent oversight)	0
(Dennis Lormel) and (Business Solutions)	0
(Dennis Lormel) and (Custom House)	4
(Dennis Lormel) and (five per cent)	0
(Dennis Lormel) and (five percent)	0
(Dennis Lormel) and (Implementation Plan)	0
(Dennis Lormel) and (know your agent)	0
(Dennis Lormel) and (money order)	0
(Dennis Lormel) and (Periodic Review*)	0
(Dennis Lormel) and (pre-paid)	9
(Dennis Lormel) and (risk assessment*)	39
(Dennis Lormel) and (Western Union Business Solutions)	0
(Dennis Lormel) and (WU Business Solutions)	0
(Dennis Lormel) and 5%	54
(Dennis Lormel) and interdict*	54
(Dennis Lormel) and KYA	24
(Dennis Lormel) and MIP*	20
(Dennis Lormel) and prepaid	0
(Dennis Lormel) and Recommendation*	30
(Dennis Lormel) and Travelex	1
(Dennis Lormel) and WUBS	31
(Dennis Lormel) w/10 ask*	0
(Dennis Lormel) w/10 call*	0
(Dennis Lormel) w/10 demand*	0
(Dennis Lormel) w/10 email*	0
(Dennis Lormel) w/10 e-mail*	0
(Dennis Lormel) w/10 evaluat*	0
(Dennis Lormel) w/10 plan	7
(Dennis Lormel) w/10 propos*	8
(Dennis Lormel) w/10 recommend*	0
(Dennis Lormel) w/10 report*	0
(Dennis Lormel) w/10 request*	0
(Dennis Lormel) w/10 respon*	5
(Dennis Lormel) w/10 review	0

Search Term	Count
(Dennis Lormel) w/10 said	0
(Dennis Lormel) w/10 say*	0
(Dennis Lormel) w/10 spoke*	0
(Dennis Lormel) w/10 state*	0
(Dennis Lormel) w/10 talk*	0
(Dennis Lormel) w/10 tell	0
(Dennis Lormel) w/10 told	0
(Dennis Lormel) w/10 writ*	0
(Dennis Lormel) w/10 wrote	0
(Douglas Meadows) and (5 %)	0
(Douglas Meadows) and (5 per cent)	0
(Douglas Meadows) and (5 percent)	0
(Douglas Meadows) and (agent oversight)	0
(Douglas Meadows) and (Business Solutions)	0
(Douglas Meadows) and (Custom House)	0
(Douglas Meadows) and (five per cent)	0
(Douglas Meadows) and (five percent)	0
(Douglas Meadows) and (Implementation Plan)	0
(Douglas Meadows) and (know your agent)	0
(Douglas Meadows) and (money order)	0
(Douglas Meadows) and (Periodic Review*)	0
(Douglas Meadows) and (pre-paid)	0
(Douglas Meadows) and (risk assessment*)	2
(Douglas Meadows) and (Western Union Business Solutions)	0
(Douglas Meadows) and (WU Business Solutions)	0
(Douglas Meadows) and 5%	2
(Douglas Meadows) and interdict*	2
(Douglas Meadows) and KYA	0
(Douglas Meadows) and MIP*	2
(Douglas Meadows) and prepaid	0
(Douglas Meadows) and Recommendation*	0
(Douglas Meadows) and Travelex	0
(Douglas Meadows) and WUBS	0
(Douglas Meadows) w/10 ask*	0
(Douglas Meadows) w/10 call*	0
(Douglas Meadows) w/10 demand*	0
(Douglas Meadows) w/10 email*	0
(Douglas Meadows) w/10 e-mail*	0
(Douglas Meadows) w/10 evaluat*	0
(Douglas Meadows) w/10 plan	0
(Douglas Meadows) w/10 propos*	0
(Douglas Meadows) w/10 recommend*	0
(Douglas Meadows) w/10 report*	0
(Douglas Meadows) w/10 request*	0
(Douglas Meadows) w/10 respon*	0
(Douglas Meadows) w/10 review	0
(Douglas Meadows) w/10 said	0
(Douglas Meadows) w/10 say*	0
(Douglas Meadows) w/10 spoke*	0
(Douglas Meadows) w/10 state*	0
(Douglas Meadows) w/10 talk*	0
(Douglas Meadows) w/10 tell	0
(Douglas Meadows) w/10 told	0
(Douglas Meadows) w/10 writ*	0
(Douglas Meadows) w/10 wrote	0
(Ernest Sohn) and (5 %)	0
(Ernest Sohn) and (5 per cent)	0
(Ernest Sohn) and (5 percent)	0
(Ernest Sohn) and (agent oversight)	0
(Ernest Sohn) and (Business Solutions)	0
(Ernest Sohn) and (Custom House)	0
(Ernest Sohn) and (five per cent)	0
(Ernest Sohn) and (five percent)	0
(Ernest Sohn) and (Implementation Plan)	0
(Ernest Sohn) and (know your agent)	0
(Ernest Sohn) and (money order)	0
(Ernest Sohn) and (Periodic Review*)	0
(Ernest Sohn) and (pre-paid)	0
(Ernest Sohn) and (risk assessment*)	0

Search Term	Count
(Ernest Sohn) and (Western Union Business Solutions)	0
(Ernest Sohn) and (WU Business Solutions)	0
(Ernest Sohn) and 5%	0
(Ernest Sohn) and interdict*	0
(Ernest Sohn) and KYA	0
(Ernest Sohn) and MIP*	0
(Ernest Sohn) and prepaid	0
(Ernest Sohn) and Recommendation*	0
(Ernest Sohn) and Travelex	0
(Ernest Sohn) and WUBS	0
(Ernest Sohn) w/10 ask*	0
(Ernest Sohn) w/10 call*	0
(Ernest Sohn) w/10 demand*	0
(Ernest Sohn) w/10 email*	0
(Ernest Sohn) w/10 e-mail*	0
(Ernest Sohn) w/10 evaluat*	0
(Ernest Sohn) w/10 plan	0
(Ernest Sohn) w/10 propos*	0
(Ernest Sohn) w/10 recommend*	0
(Ernest Sohn) w/10 report*	0
(Ernest Sohn) w/10 request*	0
(Ernest Sohn) w/10 respon*	0
(Ernest Sohn) w/10 review	0
(Ernest Sohn) w/10 said	0
(Ernest Sohn) w/10 say*	0
(Ernest Sohn) w/10 spoke*	0
(Ernest Sohn) w/10 state*	0
(Ernest Sohn) w/10 talk*	0
(Ernest Sohn) w/10 tell	0
(Ernest Sohn) w/10 told	0
(Ernest Sohn) w/10 writ*	0
(Ernest Sohn) w/10 wrote	0
(Frederick R. Kessler) or (Frederick R Kessler)	0
(JD Hannick) and (5 %)	0
(JD Hannick) and (5 per cent)	0
(JD Hannick) and (5 percent)	0
(JD Hannick) and (agent oversight)	0
(JD Hannick) and (Business Solutions)	0
(JD Hannick) and (Custom House)	0
(JD Hannick) and (five per cent)	0
(JD Hannick) and (five percent)	0
(JD Hannick) and (Implementation Plan)	0
(JD Hannick) and (know your agent)	0
(JD Hannick) and (money order)	0
(JD Hannick) and (Periodic Review*)	0
(JD Hannick) and (pre-paid)	0
(JD Hannick) and (risk assessment*)	0
(JD Hannick) and (Western Union Business Solutions)	0
(JD Hannick) and (WU Business Solutions)	0
(JD Hannick) and 5%	0
(JD Hannick) and interdict*	0
(JD Hannick) and KYA	0
(JD Hannick) and MIP*	0
(JD Hannick) and prepaid	0
(JD Hannick) and Recommendation*	0
(JD Hannick) and Travelex	0
(JD Hannick) and WUBS	0
(JD Hannick) w/10 ask*	0
(JD Hannick) w/10 call*	0
(JD Hannick) w/10 demand*	0
(JD Hannick) w/10 email*	0
(JD Hannick) w/10 e-mail*	0
(JD Hannick) w/10 evaluat*	0
(JD Hannick) w/10 plan	0
(JD Hannick) w/10 propos*	0
(JD Hannick) w/10 recommend*	0
(JD Hannick) w/10 report*	0
(JD Hannick) w/10 request*	0
(JD Hannick) w/10 respon*	0

Search Term	Count
(JD Hannick) w/10 review	0
(JD Hannick) w/10 said	0
(JD Hannick) w/10 say*	0
(JD Hannick) w/10 spoke*	0
(JD Hannick) w/10 state*	0
(JD Hannick) w/10 talk*	0
(JD Hannick) w/10 tell	0
(JD Hannick) w/10 told	0
(JD Hannick) w/10 writ*	0
(JD Hannick) w/10 wrote	0
(Jeff Hunter) and (5 %)	0
(Jeff Hunter) and (5 per cent)	0
(Jeff Hunter) and (5 percent)	0
(Jeff Hunter) and (agent oversight)	0
(Jeff Hunter) and (Business Solutions)	0
(Jeff Hunter) and (Custom House)	0
(Jeff Hunter) and (five per cent)	0
(Jeff Hunter) and (five percent)	0
(Jeff Hunter) and (Implementation Plan)	0
(Jeff Hunter) and (know your agent)	0
(Jeff Hunter) and (money order)	0
(Jeff Hunter) and (Periodic Review*)	0
(Jeff Hunter) and (pre-paid)	0
(Jeff Hunter) and (risk assessment*)	0
(Jeff Hunter) and (Western Union Business Solutions)	0
(Jeff Hunter) and (WU Business Solutions)	0
(Jeff Hunter) and 5%	0
(Jeff Hunter) and interdict*	0
(Jeff Hunter) and KYA	0
(Jeff Hunter) and MIP*	0
(Jeff Hunter) and prepaid	0
(Jeff Hunter) and Recommendation*	0
(Jeff Hunter) and Travelex	0
(Jeff Hunter) and WUBS	0
(Jeff Hunter) w/10 ask*	0
(Jeff Hunter) w/10 call*	0
(Jeff Hunter) w/10 demand*	0
(Jeff Hunter) w/10 email*	0
(Jeff Hunter) w/10 e-mail*	0
(Jeff Hunter) w/10 evaluat*	0
(Jeff Hunter) w/10 plan	0
(Jeff Hunter) w/10 propos*	0
(Jeff Hunter) w/10 recommend*	0
(Jeff Hunter) w/10 report*	0
(Jeff Hunter) w/10 request*	0
(Jeff Hunter) w/10 respon*	0
(Jeff Hunter) w/10 review	0
(Jeff Hunter) w/10 said	0
(Jeff Hunter) w/10 say*	0
(Jeff Hunter) w/10 spoke*	0
(Jeff Hunter) w/10 state*	0
(Jeff Hunter) w/10 talk*	0
(Jeff Hunter) w/10 tell	0
(Jeff Hunter) w/10 told	0
(Jeff Hunter) w/10 writ*	0
(Jeff Hunter) w/10 wrote	0
(John Bell) and (5 %)	0
(John Bell) and (5 per cent)	0
(John Bell) and (5 percent)	0
(John Bell) and (agent oversight)	0
(John Bell) and (Business Solutions)	0
(John Bell) and (Custom House)	2
(John Bell) and (five per cent)	0
(John Bell) and (five percent)	0
(John Bell) and (Implementation Plan)	0
(John Bell) and (know your agent)	0
(John Bell) and (money order)	3
(John Bell) and (Periodic Review*)	0
(John Bell) and (pre-paid)	9

Search Term	Count
(John Bell) and (risk assessment*)	37
(John Bell) and (Western Union Business Solutions)	0
(John Bell) and (WU Business Solutions)	0
(John Bell) and 5%	104
(John Bell) and interdict*	48
(John Bell) and KYA	24
(John Bell) and MIP*	20
(John Bell) and prepaid	29
(John Bell) and Recommendation*	20
(John Bell) and Travelex	28
(John Bell) and WUBS	25
(John Bell) w/10 ask*	0
(John Bell) w/10 call*	8
(John Bell) w/10 demand*	0
(John Bell) w/10 email*	0
(John Bell) w/10 e-mail*	0
(John Bell) w/10 evaluat*	0
(John Bell) w/10 plan	0
(John Bell) w/10 propos*	0
(John Bell) w/10 recommend*	0
(John Bell) w/10 report*	0
(John Bell) w/10 request*	0
(John Bell) w/10 respon*	0
(John Bell) w/10 review	2
(John Bell) w/10 said	0
(John Bell) w/10 say*	0
(John Bell) w/10 spoke*	0
(John Bell) w/10 state*	53
(John Bell) w/10 talk*	0
(John Bell) w/10 tell	0
(John Bell) w/10 told	0
(John Bell) w/10 writ*	0
(John Bell) w/10 wrote	0
(John De Wulf) and (5 %)	0
(John De Wulf) and (5 per cent)	0
(John De Wulf) and (5 percent)	0
(John De Wulf) and (agent oversight)	0
(John De Wulf) and (Business Solutions)	0
(John De Wulf) and (Custom House)	0
(John De Wulf) and (five per cent)	0
(John De Wulf) and (five percent)	0
(John De Wulf) and (Implementation Plan)	0
(John De Wulf) and (know your agent)	0
(John De Wulf) and (money order)	0
(John De Wulf) and (Periodic Review*)	0
(John De Wulf) and (pre-paid)	0
(John De Wulf) and (risk assessment*)	0
(John De Wulf) and (Western Union Business Solutions)	0
(John De Wulf) and (WU Business Solutions)	0
(John De Wulf) and 5%	0
(John De Wulf) and interdict*	0
(John De Wulf) and KYA	0
(John De Wulf) and MIP*	0
(John De Wulf) and prepaid	0
(John De Wulf) and Recommendation*	0
(John De Wulf) and Travelex	0
(John De Wulf) and WUBS	0
(John De Wulf) w/10 ask*	0
(John De Wulf) w/10 call*	0
(John De Wulf) w/10 demand*	0
(John De Wulf) w/10 email*	0
(John De Wulf) w/10 e-mail*	0
(John De Wulf) w/10 evaluat*	0
(John De Wulf) w/10 plan	0
(John De Wulf) w/10 propos*	0
(John De Wulf) w/10 recommend*	0
(John De Wulf) w/10 report*	0
(John De Wulf) w/10 request*	0
(John De Wulf) w/10 respon*	0

Search Term	Count
(John De Wulf) w/10 review	0
(John De Wulf) w/10 said	0
(John De Wulf) w/10 say*	0
(John De Wulf) w/10 spoke*	0
(John De Wulf) w/10 state*	0
(John De Wulf) w/10 talk*	0
(John De Wulf) w/10 tell	0
(John De Wulf) w/10 told	0
(John De Wulf) w/10 writ*	0
(John De Wulf) w/10 wrote	0
(John Knapp) and (5 %)	0
(John Knapp) and (5 per cent)	0
(John Knapp) and (5 percent)	0
(John Knapp) and (agent oversight)	16
(John Knapp) and (Business Solutions)	0
(John Knapp) and (Custom House)	0
(John Knapp) and (five per cent)	0
(John Knapp) and (five percent)	0
(John Knapp) and (Implementation Plan)	16
(John Knapp) and (know your agent)	16
(John Knapp) and (money order)	19
(John Knapp) and (Periodic Review*)	10
(John Knapp) and (pre-paid)	25
(John Knapp) and (risk assessment*)	41
(John Knapp) and (Western Union Business Solutions)	0
(John Knapp) and (WU Business Solutions)	0
(John Knapp) and 5%	50
(John Knapp) and interdict*	48
(John Knapp) and KYA	42
(John Knapp) and MIP*	37
(John Knapp) and prepaid	20
(John Knapp) and Recommendation*	31
(John Knapp) and Travelex	0
(John Knapp) and WUBS	38
(John Knapp) w/10 ask*	0
(John Knapp) w/10 call*	0
(John Knapp) w/10 demand*	0
(John Knapp) w/10 email*	1
(John Knapp) w/10 e-mail*	0
(John Knapp) w/10 evaluat*	0
(John Knapp) w/10 plan	0
(John Knapp) w/10 propos*	0
(John Knapp) w/10 recommend*	2
(John Knapp) w/10 report*	10
(John Knapp) w/10 request*	1
(John Knapp) w/10 respon*	0
(John Knapp) w/10 review	2
(John Knapp) w/10 said	0
(John Knapp) w/10 say*	0
(John Knapp) w/10 spoke*	1
(John Knapp) w/10 state*	4
(John Knapp) w/10 talk*	0
(John Knapp) w/10 tell	0
(John Knapp) w/10 told	0
(John Knapp) w/10 writ*	0
(John Knapp) w/10 wrote	0
(Lisa Dawson) and (5 %)	0
(Lisa Dawson) and (5 per cent)	0
(Lisa Dawson) and (5 percent)	0
(Lisa Dawson) and (agent oversight)	0
(Lisa Dawson) and (Business Solutions)	0
(Lisa Dawson) and (Custom House)	0
(Lisa Dawson) and (five per cent)	0
(Lisa Dawson) and (five percent)	0
(Lisa Dawson) and (Implementation Plan)	0
(Lisa Dawson) and (know your agent)	0
(Lisa Dawson) and (money order)	0
(Lisa Dawson) and (Periodic Review*)	0
(Lisa Dawson) and (pre-paid)	0

Search Term	Count
(Lisa Dawson) and (risk assessment*)	0
(Lisa Dawson) and (Western Union Business Solutions)	0
(Lisa Dawson) and (WU Business Solutions)	0
(Lisa Dawson) and 5%	0
(Lisa Dawson) and interdict*	0
(Lisa Dawson) and KYA	0
(Lisa Dawson) and MIP*	0
(Lisa Dawson) and prepaid	0
(Lisa Dawson) and Recommendation*	0
(Lisa Dawson) and Travelex	0
(Lisa Dawson) and WUBS	0
(Lisa Dawson) w/10 ask*	0
(Lisa Dawson) w/10 call*	0
(Lisa Dawson) w/10 demand*	0
(Lisa Dawson) w/10 email*	0
(Lisa Dawson) w/10 e-mail*	0
(Lisa Dawson) w/10 evaluat*	0
(Lisa Dawson) w/10 plan	0
(Lisa Dawson) w/10 propos*	0
(Lisa Dawson) w/10 recommend*	0
(Lisa Dawson) w/10 report*	0
(Lisa Dawson) w/10 request*	0
(Lisa Dawson) w/10 respon*	0
(Lisa Dawson) w/10 review	0
(Lisa Dawson) w/10 said	0
(Lisa Dawson) w/10 say*	0
(Lisa Dawson) w/10 spoke*	0
(Lisa Dawson) w/10 state*	0
(Lisa Dawson) w/10 talk*	0
(Lisa Dawson) w/10 tell	0
(Lisa Dawson) w/10 told	0
(Lisa Dawson) w/10 writ*	0
(Lisa Dawson) w/10 wrote	0
(Lonnie Keene) and (5 %)	0
(Lonnie Keene) and (5 per cent)	0
(Lonnie Keene) and (5 percent)	0
(Lonnie Keene) and (agent oversight)	0
(Lonnie Keene) and (Business Solutions)	1
(Lonnie Keene) and (Custom House)	1
(Lonnie Keene) and (five per cent)	0
(Lonnie Keene) and (five percent)	0
(Lonnie Keene) and (Implementation Plan)	0
(Lonnie Keene) and (know your agent)	0
(Lonnie Keene) and (money order)	1
(Lonnie Keene) and (Periodic Review*)	0
(Lonnie Keene) and (pre-paid)	0
(Lonnie Keene) and (risk assessment*)	6
(Lonnie Keene) and (Western Union Business Solutions)	0
(Lonnie Keene) and (WU Business Solutions)	0
(Lonnie Keene) and 5%	10
(Lonnie Keene) and interdict*	17
(Lonnie Keene) and KYA	0
(Lonnie Keene) and MIP*	2
(Lonnie Keene) and prepaid	1
(Lonnie Keene) and Recommendation*	3
(Lonnie Keene) and Travelex	0
(Lonnie Keene) and WUBS	0
(Lonnie Keene) w/10 ask*	0
(Lonnie Keene) w/10 call*	0
(Lonnie Keene) w/10 demand*	0
(Lonnie Keene) w/10 email*	0
(Lonnie Keene) w/10 e-mail*	0
(Lonnie Keene) w/10 evaluat*	1
(Lonnie Keene) w/10 plan	0
(Lonnie Keene) w/10 propos*	0
(Lonnie Keene) w/10 recommend*	0
(Lonnie Keene) w/10 report*	0
(Lonnie Keene) w/10 request*	0
(Lonnie Keene) w/10 respon*	0

Search Term	Count
(Lonnie Keene) w/10 review	0
(Lonnie Keene) w/10 said	0
(Lonnie Keene) w/10 say*	0
(Lonnie Keene) w/10 spoke*	0
(Lonnie Keene) w/10 state*	0
(Lonnie Keene) w/10 talk*	0
(Lonnie Keene) w/10 tell	0
(Lonnie Keene) w/10 told	0
(Lonnie Keene) w/10 writ*	0
(Lonnie Keene) w/10 wrote	0
(Matt Derstine) and (5 %)	0
(Matt Derstine) and (5 per cent)	0
(Matt Derstine) and (5 percent)	0
(Matt Derstine) and (agent oversight)	0
(Matt Derstine) and (Business Solutions)	0
(Matt Derstine) and (Custom House)	0
(Matt Derstine) and (five per cent)	0
(Matt Derstine) and (five percent)	0
(Matt Derstine) and (Implementation Plan)	0
(Matt Derstine) and (know your agent)	0
(Matt Derstine) and (money order)	0
(Matt Derstine) and (Periodic Review*)	0
(Matt Derstine) and (pre-paid)	0
(Matt Derstine) and (risk assessment*)	0
(Matt Derstine) and (Western Union Business Solutions)	0
(Matt Derstine) and (WU Business Solutions)	0
(Matt Derstine) and 5%	0
(Matt Derstine) and interdict*	0
(Matt Derstine) and KYA	0
(Matt Derstine) and MIP*	0
(Matt Derstine) and prepaid	0
(Matt Derstine) and Recommendation*	0
(Matt Derstine) and Travelex	0
(Matt Derstine) and WUBS	0
(Matt Derstine) w/10 ask*	0
(Matt Derstine) w/10 call*	0
(Matt Derstine) w/10 demand*	0
(Matt Derstine) w/10 email*	0
(Matt Derstine) w/10 e-mail*	0
(Matt Derstine) w/10 evaluat*	0
(Matt Derstine) w/10 plan	0
(Matt Derstine) w/10 propos*	0
(Matt Derstine) w/10 recommend*	0
(Matt Derstine) w/10 report*	0
(Matt Derstine) w/10 request*	0
(Matt Derstine) w/10 respon*	0
(Matt Derstine) w/10 review	0
(Matt Derstine) w/10 said	0
(Matt Derstine) w/10 say*	0
(Matt Derstine) w/10 spoke*	0
(Matt Derstine) w/10 state*	0
(Matt Derstine) w/10 talk*	0
(Matt Derstine) w/10 tell	0
(Matt Derstine) w/10 told	0
(Matt Derstine) w/10 writ*	0
(Matt Derstine) w/10 wrote	0
(Michael Ledley) and (5 %)	0
(Michael Ledley) and (5 per cent)	0
(Michael Ledley) and (5 percent)	0
(Michael Ledley) and (agent oversight)	0
(Michael Ledley) and (Business Solutions)	0
(Michael Ledley) and (Custom House)	0
(Michael Ledley) and (five per cent)	0
(Michael Ledley) and (five percent)	0
(Michael Ledley) and (Implementation Plan)	0
(Michael Ledley) and (know your agent)	0
(Michael Ledley) and (money order)	0
(Michael Ledley) and (Periodic Review*)	0
(Michael Ledley) and (pre-paid)	0

Search Term	Count
(Michael Ledley) and (risk assessment*)	0
(Michael Ledley) and (Western Union Business Solutions)	0
(Michael Ledley) and (WU Business Solutions)	0
(Michael Ledley) and 5%	0
(Michael Ledley) and interdict*	0
(Michael Ledley) and KYA	0
(Michael Ledley) and MIP*	0
(Michael Ledley) and prepaid	0
(Michael Ledley) and Recommendation*	0
(Michael Ledley) and Travelex	0
(Michael Ledley) and WUBS	0
(Michael Ledley) w/10 ask*	0
(Michael Ledley) w/10 call*	0
(Michael Ledley) w/10 demand*	0
(Michael Ledley) w/10 email*	0
(Michael Ledley) w/10 e-mail*	0
(Michael Ledley) w/10 evaluat*	0
(Michael Ledley) w/10 plan	0
(Michael Ledley) w/10 propos*	0
(Michael Ledley) w/10 recommend*	0
(Michael Ledley) w/10 report*	0
(Michael Ledley) w/10 request*	0
(Michael Ledley) w/10 respon*	0
(Michael Ledley) w/10 review	0
(Michael Ledley) w/10 said	0
(Michael Ledley) w/10 say*	0
(Michael Ledley) w/10 spoke*	0
(Michael Ledley) w/10 state*	0
(Michael Ledley) w/10 talk*	0
(Michael Ledley) w/10 tell	0
(Michael Ledley) w/10 told	0
(Michael Ledley) w/10 writ*	0
(Michael Ledley) w/10 wrote	0
(Nick Nahas) and (5 %)	0
(Nick Nahas) and (5 per cent)	0
(Nick Nahas) and (5 percent)	0
(Nick Nahas) and (agent oversight)	0
(Nick Nahas) and (Business Solutions)	0
(Nick Nahas) and (Custom House)	0
(Nick Nahas) and (five per cent)	0
(Nick Nahas) and (five percent)	0
(Nick Nahas) and (Implementation Plan)	0
(Nick Nahas) and (know your agent)	0
(Nick Nahas) and (money order)	0
(Nick Nahas) and (Periodic Review*)	0
(Nick Nahas) and (pre-paid)	0
(Nick Nahas) and (risk assessment*)	0
(Nick Nahas) and (Western Union Business Solutions)	0
(Nick Nahas) and (WU Business Solutions)	0
(Nick Nahas) and 5%	0
(Nick Nahas) and interdict*	0
(Nick Nahas) and KYA	0
(Nick Nahas) and MIP*	0
(Nick Nahas) and prepaid	0
(Nick Nahas) and Recommendation*	0
(Nick Nahas) and Travelex	0
(Nick Nahas) and WUBS	0
(Nick Nahas) w/10 ask*	0
(Nick Nahas) w/10 call*	0
(Nick Nahas) w/10 demand*	0
(Nick Nahas) w/10 email*	0
(Nick Nahas) w/10 e-mail*	0
(Nick Nahas) w/10 evaluat*	0
(Nick Nahas) w/10 plan	0
(Nick Nahas) w/10 propos*	0
(Nick Nahas) w/10 recommend*	0
(Nick Nahas) w/10 report*	0
(Nick Nahas) w/10 request*	0
(Nick Nahas) w/10 respon*	0

Search Term	Count
(Nick Nahas) w/10 review	0
(Nick Nahas) w/10 said	0
(Nick Nahas) w/10 say*	0
(Nick Nahas) w/10 spoke*	0
(Nick Nahas) w/10 state*	0
(Nick Nahas) w/10 talk*	0
(Nick Nahas) w/10 tell	0
(Nick Nahas) w/10 told	0
(Nick Nahas) w/10 writ*	0
(Nick Nahas) w/10 wrote	0
(Patrick Mahon) and (5 %)	0
(Patrick Mahon) and (5 per cent)	0
(Patrick Mahon) and (5 percent)	0
(Patrick Mahon) and (agent oversight)	0
(Patrick Mahon) and (Business Solutions)	0
(Patrick Mahon) and (Custom House)	0
(Patrick Mahon) and (five per cent)	0
(Patrick Mahon) and (five percent)	0
(Patrick Mahon) and (Implementation Plan)	0
(Patrick Mahon) and (know your agent)	0
(Patrick Mahon) and (money order)	0
(Patrick Mahon) and (Periodic Review*)	0
(Patrick Mahon) and (pre-paid)	0
(Patrick Mahon) and (risk assessment*)	1
(Patrick Mahon) and (Western Union Business Solutions)	0
(Patrick Mahon) and (WU Business Solutions)	0
(Patrick Mahon) and 5%	1
(Patrick Mahon) and interdict*	1
(Patrick Mahon) and KYA	0
(Patrick Mahon) and MIP*	0
(Patrick Mahon) and prepaid	0
(Patrick Mahon) and Recommendation*	0
(Patrick Mahon) and Travelex	0
(Patrick Mahon) and WUBS	0
(Patrick Mahon) w/10 ask*	0
(Patrick Mahon) w/10 call*	1
(Patrick Mahon) w/10 demand*	0
(Patrick Mahon) w/10 email*	0
(Patrick Mahon) w/10 e-mail*	0
(Patrick Mahon) w/10 evaluat*	0
(Patrick Mahon) w/10 plan	0
(Patrick Mahon) w/10 propos*	0
(Patrick Mahon) w/10 recommend*	0
(Patrick Mahon) w/10 report*	0
(Patrick Mahon) w/10 request*	0
(Patrick Mahon) w/10 respon*	0
(Patrick Mahon) w/10 review	0
(Patrick Mahon) w/10 said	0
(Patrick Mahon) w/10 say*	0
(Patrick Mahon) w/10 spoke*	0
(Patrick Mahon) w/10 state*	1
(Patrick Mahon) w/10 talk*	0
(Patrick Mahon) w/10 tell	0
(Patrick Mahon) w/10 told	0
(Patrick Mahon) w/10 writ*	0
(Patrick Mahon) w/10 wrote	0
(Paul Lewis) and (5 %)	0
(Paul Lewis) and (5 per cent)	0
(Paul Lewis) and (5 percent)	0
(Paul Lewis) and (agent oversight)	0
(Paul Lewis) and (Business Solutions)	0
(Paul Lewis) and (Custom House)	3
(Paul Lewis) and (five per cent)	0
(Paul Lewis) and (five percent)	0
(Paul Lewis) and (Implementation Plan)	0
(Paul Lewis) and (know your agent)	0
(Paul Lewis) and (money order)	6
(Paul Lewis) and (Periodic Review*)	0
(Paul Lewis) and (pre-paid)	9

Search Term	Count
(Paul Lewis) and (risk assessment*)	26
(Paul Lewis) and (Western Union Business Solutions)	0
(Paul Lewis) and (WU Business Solutions)	0
(Paul Lewis) and 5%	69
(Paul Lewis) and interdict*	33
(Paul Lewis) and KYA	27
(Paul Lewis) and MIP*	26
(Paul Lewis) and prepaid	7
(Paul Lewis) and Recommendation*	18
(Paul Lewis) and Travelex	30
(Paul Lewis) and WUBS	22
(Paul Lewis) w/10 ask*	0
(Paul Lewis) w/10 call*	5
(Paul Lewis) w/10 demand*	0
(Paul Lewis) w/10 email*	0
(Paul Lewis) w/10 e-mail*	0
(Paul Lewis) w/10 evaluat*	0
(Paul Lewis) w/10 plan	0
(Paul Lewis) w/10 propos*	0
(Paul Lewis) w/10 recommend*	2
(Paul Lewis) w/10 report*	0
(Paul Lewis) w/10 request*	0
(Paul Lewis) w/10 respon*	0
(Paul Lewis) w/10 review	0
(Paul Lewis) w/10 said	0
(Paul Lewis) w/10 say*	0
(Paul Lewis) w/10 spoke*	0
(Paul Lewis) w/10 state*	38
(Paul Lewis) w/10 talk*	0
(Paul Lewis) w/10 tell	0
(Paul Lewis) w/10 told	0
(Paul Lewis) w/10 writ*	0
(Paul Lewis) w/10 wrote	0
(Rachele Byrne) and (5 %)	0
(Rachele Byrne) and (5 per cent)	0
(Rachele Byrne) and (5 percent)	0
(Rachele Byrne) and (agent oversight)	0
(Rachele Byrne) and (Business Solutions)	0
(Rachele Byrne) and (Custom House)	0
(Rachele Byrne) and (five per cent)	0
(Rachele Byrne) and (five percent)	0
(Rachele Byrne) and (Implementation Plan)	0
(Rachele Byrne) and (know your agent)	0
(Rachele Byrne) and (money order)	0
(Rachele Byrne) and (Periodic Review*)	0
(Rachele Byrne) and (pre-paid)	0
(Rachele Byrne) and (risk assessment*)	0
(Rachele Byrne) and (Western Union Business Solutions)	0
(Rachele Byrne) and (WU Business Solutions)	0
(Rachele Byrne) and 5%	0
(Rachele Byrne) and interdict*	0
(Rachele Byrne) and KYA	0
(Rachele Byrne) and MIP*	0
(Rachele Byrne) and prepaid	0
(Rachele Byrne) and Recommendation*	0
(Rachele Byrne) and Travelex	0
(Rachele Byrne) and WUBS	0
(Rachele Byrne) w/10 ask*	0
(Rachele Byrne) w/10 call*	0
(Rachele Byrne) w/10 demand*	0
(Rachele Byrne) w/10 email*	0
(Rachele Byrne) w/10 e-mail*	0
(Rachele Byrne) w/10 evaluat*	0
(Rachele Byrne) w/10 plan	0
(Rachele Byrne) w/10 propos*	0
(Rachele Byrne) w/10 recommend*	0
(Rachele Byrne) w/10 report*	0
(Rachele Byrne) w/10 request*	0
(Rachele Byrne) w/10 respon*	0

Search Term	Count
(Rachele Byrne) w/10 review	0
(Rachele Byrne) w/10 said	0
(Rachele Byrne) w/10 say*	0
(Rachele Byrne) w/10 spoke*	0
(Rachele Byrne) w/10 state*	0
(Rachele Byrne) w/10 talk*	0
(Rachele Byrne) w/10 tell	0
(Rachele Byrne) w/10 told	0
(Rachele Byrne) w/10 writ*	0
(Rachele Byrne) w/10 wrote	0
(Reynold Benjamin) and (5 %)	0
(Reynold Benjamin) and (5 per cent)	0
(Reynold Benjamin) and (5 percent)	0
(Reynold Benjamin) and (agent oversight)	0
(Reynold Benjamin) and (Business Solutions)	0
(Reynold Benjamin) and (Custom House)	0
(Reynold Benjamin) and (five per cent)	0
(Reynold Benjamin) and (five percent)	0
(Reynold Benjamin) and (Implementation Plan)	0
(Reynold Benjamin) and (know your agent)	0
(Reynold Benjamin) and (money order)	0
(Reynold Benjamin) and (Periodic Review*)	0
(Reynold Benjamin) and (pre-paid)	0
(Reynold Benjamin) and (risk assessment*)	0
(Reynold Benjamin) and (Western Union Business Solutions)	0
(Reynold Benjamin) and (WU Business Solutions)	0
(Reynold Benjamin) and 5%	0
(Reynold Benjamin) and interdict*	0
(Reynold Benjamin) and KYA	0
(Reynold Benjamin) and MIP*	0
(Reynold Benjamin) and prepaid	0
(Reynold Benjamin) and Recommendation*	0
(Reynold Benjamin) and Travelex	0
(Reynold Benjamin) and WUBS	0
(Reynold Benjamin) w/10 ask*	0
(Reynold Benjamin) w/10 call*	0
(Reynold Benjamin) w/10 demand*	0
(Reynold Benjamin) w/10 email*	0
(Reynold Benjamin) w/10 e-mail*	0
(Reynold Benjamin) w/10 evaluat*	0
(Reynold Benjamin) w/10 plan	0
(Reynold Benjamin) w/10 propos*	0
(Reynold Benjamin) w/10 recommend*	0
(Reynold Benjamin) w/10 report*	0
(Reynold Benjamin) w/10 request*	0
(Reynold Benjamin) w/10 respon*	0
(Reynold Benjamin) w/10 review	0
(Reynold Benjamin) w/10 said	0
(Reynold Benjamin) w/10 say*	0
(Reynold Benjamin) w/10 spoke*	0
(Reynold Benjamin) w/10 state*	0
(Reynold Benjamin) w/10 talk*	0
(Reynold Benjamin) w/10 tell	0
(Reynold Benjamin) w/10 told	0
(Reynold Benjamin) w/10 writ*	0
(Reynold Benjamin) w/10 wrote	0
(Ricki Conrey) and (5 %)	0
(Ricki Conrey) and (5 per cent)	0
(Ricki Conrey) and (5 percent)	0
(Ricki Conrey) and (agent oversight)	0
(Ricki Conrey) and (Business Solutions)	0
(Ricki Conrey) and (Custom House)	0
(Ricki Conrey) and (five per cent)	0
(Ricki Conrey) and (five percent)	0
(Ricki Conrey) and (Implementation Plan)	0
(Ricki Conrey) and (know your agent)	0
(Ricki Conrey) and (money order)	0
(Ricki Conrey) and (Periodic Review*)	0
(Ricki Conrey) and (pre-paid)	0

Search Term	Count
(Ricki Conrey) and (risk assessment*)	2
(Ricki Conrey) and (Western Union Business Solutions)	0
(Ricki Conrey) and (WU Business Solutions)	0
(Ricki Conrey) and 5%	2
(Ricki Conrey) and interdict*	2
(Ricki Conrey) and KYA	0
(Ricki Conrey) and MIP*	2
(Ricki Conrey) and prepaid	0
(Ricki Conrey) and Recommendation*	0
(Ricki Conrey) and Travelex	0
(Ricki Conrey) and WUBS	0
(Ricki Conrey) w/10 ask*	0
(Ricki Conrey) w/10 call*	0
(Ricki Conrey) w/10 demand*	0
(Ricki Conrey) w/10 email*	0
(Ricki Conrey) w/10 e-mail*	0
(Ricki Conrey) w/10 evaluat*	0
(Ricki Conrey) w/10 plan	0
(Ricki Conrey) w/10 propos*	0
(Ricki Conrey) w/10 recommend*	0
(Ricki Conrey) w/10 report*	0
(Ricki Conrey) w/10 request*	0
(Ricki Conrey) w/10 respon*	0
(Ricki Conrey) w/10 review	0
(Ricki Conrey) w/10 said	0
(Ricki Conrey) w/10 say*	0
(Ricki Conrey) w/10 spoke*	0
(Ricki Conrey) w/10 state*	0
(Ricki Conrey) w/10 talk*	0
(Ricki Conrey) w/10 tell	0
(Ricki Conrey) w/10 told	0
(Ricki Conrey) w/10 writ*	0
(Ricki Conrey) w/10 wrote	0
(Robert Silbering) and (5 %)	0
(Robert Silbering) and (5 per cent)	0
(Robert Silbering) and (5 percent)	0
(Robert Silbering) and (agent oversight)	0
(Robert Silbering) and (Business Solutions)	0
(Robert Silbering) and (Custom House)	0
(Robert Silbering) and (five per cent)	0
(Robert Silbering) and (five percent)	0
(Robert Silbering) and (Implementation Plan)	0
(Robert Silbering) and (know your agent)	0
(Robert Silbering) and (money order)	0
(Robert Silbering) and (Periodic Review*)	0
(Robert Silbering) and (pre-paid)	0
(Robert Silbering) and (risk assessment*)	0
(Robert Silbering) and (Western Union Business Solutions)	0
(Robert Silbering) and (WU Business Solutions)	0
(Robert Silbering) and 5%	0
(Robert Silbering) and interdict*	0
(Robert Silbering) and KYA	0
(Robert Silbering) and MIP*	0
(Robert Silbering) and prepaid	0
(Robert Silbering) and Recommendation*	0
(Robert Silbering) and Travelex	0
(Robert Silbering) and WUBS	0
(Robert Silbering) w/10 ask*	0
(Robert Silbering) w/10 call*	0
(Robert Silbering) w/10 demand*	0
(Robert Silbering) w/10 email*	0
(Robert Silbering) w/10 e-mail*	0
(Robert Silbering) w/10 evaluat*	0
(Robert Silbering) w/10 plan	0
(Robert Silbering) w/10 propos*	0
(Robert Silbering) w/10 recommend*	0
(Robert Silbering) w/10 report*	0
(Robert Silbering) w/10 request*	0
(Robert Silbering) w/10 respon*	0

Search Term	Count
(Robert Silbering) w/10 review	0
(Robert Silbering) w/10 said	0
(Robert Silbering) w/10 say*	0
(Robert Silbering) w/10 spoke*	0
(Robert Silbering) w/10 state*	0
(Robert Silbering) w/10 talk*	0
(Robert Silbering) w/10 tell	0
(Robert Silbering) w/10 told	0
(Robert Silbering) w/10 writ*	0
(Robert Silbering) w/10 wrote	0
(Sarah Schuyler) and (5 %)	0
(Sarah Schuyler) and (5 per cent)	0
(Sarah Schuyler) and (5 percent)	0
(Sarah Schuyler) and (agent oversight)	0
(Sarah Schuyler) and (Business Solutions)	0
(Sarah Schuyler) and (Custom House)	0
(Sarah Schuyler) and (five per cent)	0
(Sarah Schuyler) and (five percent)	0
(Sarah Schuyler) and (Implementation Plan)	0
(Sarah Schuyler) and (know your agent)	0
(Sarah Schuyler) and (money order)	0
(Sarah Schuyler) and (Periodic Review*)	0
(Sarah Schuyler) and (pre-paid)	0
(Sarah Schuyler) and (risk assessment*)	0
(Sarah Schuyler) and (Western Union Business Solutions)	0
(Sarah Schuyler) and (WU Business Solutions)	0
(Sarah Schuyler) and 5%	19
(Sarah Schuyler) and interdict*	1
(Sarah Schuyler) and KYA	0
(Sarah Schuyler) and MIP*	0
(Sarah Schuyler) and prepaid	0
(Sarah Schuyler) and Recommendation*	0
(Sarah Schuyler) and Travelex	18
(Sarah Schuyler) and WUBS	0
(Sarah Schuyler) w/10 ask*	0
(Sarah Schuyler) w/10 call*	0
(Sarah Schuyler) w/10 demand*	0
(Sarah Schuyler) w/10 email*	0
(Sarah Schuyler) w/10 e-mail*	0
(Sarah Schuyler) w/10 evaluat*	0
(Sarah Schuyler) w/10 plan	0
(Sarah Schuyler) w/10 propos*	0
(Sarah Schuyler) w/10 recommend*	0
(Sarah Schuyler) w/10 report*	0
(Sarah Schuyler) w/10 request*	0
(Sarah Schuyler) w/10 respon*	0
(Sarah Schuyler) w/10 review	0
(Sarah Schuyler) w/10 said	0
(Sarah Schuyler) w/10 say*	0
(Sarah Schuyler) w/10 spoke*	0
(Sarah Schuyler) w/10 state*	18
(Sarah Schuyler) w/10 talk*	0
(Sarah Schuyler) w/10 tell	0
(Sarah Schuyler) w/10 told	0
(Sarah Schuyler) w/10 writ*	0
(Sarah Schuyler) w/10 wrote	0
(Steven Escaravage) and (5 %)	0
(Steven Escaravage) and (5 per cent)	0
(Steven Escaravage) and (5 percent)	0
(Steven Escaravage) and (agent oversight)	0
(Steven Escaravage) and (Business Solutions)	0
(Steven Escaravage) and (Custom House)	0
(Steven Escaravage) and (five per cent)	0
(Steven Escaravage) and (five percent)	0
(Steven Escaravage) and (Implementation Plan)	0
(Steven Escaravage) and (know your agent)	0
(Steven Escaravage) and (money order)	0
(Steven Escaravage) and (Periodic Review*)	0
(Steven Escaravage) and (pre-paid)	0

Search Term	Count
(Steven Escaravage) and (risk assessment*)	0
(Steven Escaravage) and (Western Union Business Solutions)	0
(Steven Escaravage) and (WU Business Solutions)	0
(Steven Escaravage) and 5%	0
(Steven Escaravage) and interdict*	0
(Steven Escaravage) and KYA	0
(Steven Escaravage) and MIP*	0
(Steven Escaravage) and prepaid	0
(Steven Escaravage) and Recommendation*	0
(Steven Escaravage) and Travelex	0
(Steven Escaravage) and WUBS	0
(Steven Escaravage) w/10 ask*	0
(Steven Escaravage) w/10 call*	0
(Steven Escaravage) w/10 demand*	0
(Steven Escaravage) w/10 email*	0
(Steven Escaravage) w/10 e-mail*	0
(Steven Escaravage) w/10 evaluat*	0
(Steven Escaravage) w/10 plan	0
(Steven Escaravage) w/10 propos*	0
(Steven Escaravage) w/10 recommend*	0
(Steven Escaravage) w/10 report*	0
(Steven Escaravage) w/10 request*	0
(Steven Escaravage) w/10 respon*	0
(Steven Escaravage) w/10 review	0
(Steven Escaravage) w/10 said	0
(Steven Escaravage) w/10 say*	0
(Steven Escaravage) w/10 spoke*	0
(Steven Escaravage) w/10 state*	0
(Steven Escaravage) w/10 talk*	0
(Steven Escaravage) w/10 tell	0
(Steven Escaravage) w/10 told	0
(Steven Escaravage) w/10 writ*	0
(Steven Escaravage) w/10 wrote	0
(Ted Greenberg) and (5 %)	0
(Ted Greenberg) and (5 per cent)	0
(Ted Greenberg) and (5 percent)	0
(Ted Greenberg) and (agent oversight)	0
(Ted Greenberg) and (Business Solutions)	0
(Ted Greenberg) and (Custom House)	3
(Ted Greenberg) and (five per cent)	0
(Ted Greenberg) and (five percent)	0
(Ted Greenberg) and (Implementation Plan)	1
(Ted Greenberg) and (know your agent)	0
(Ted Greenberg) and (money order)	0
(Ted Greenberg) and (Periodic Review*)	0
(Ted Greenberg) and (pre-paid)	11
(Ted Greenberg) and (risk assessment*)	27
(Ted Greenberg) and (Western Union Business Solutions)	0
(Ted Greenberg) and (WU Business Solutions)	0
(Ted Greenberg) and 5%	41
(Ted Greenberg) and interdict*	43
(Ted Greenberg) and KYA	24
(Ted Greenberg) and MIP*	18
(Ted Greenberg) and prepaid	2
(Ted Greenberg) and Recommendation*	23
(Ted Greenberg) and Travelex	2
(Ted Greenberg) and WUBS	32
(Ted Greenberg) w/10 ask*	0
(Ted Greenberg) w/10 call*	1
(Ted Greenberg) w/10 demand*	0
(Ted Greenberg) w/10 email*	0
(Ted Greenberg) w/10 e-mail*	0
(Ted Greenberg) w/10 evaluat*	0
(Ted Greenberg) w/10 plan	0
(Ted Greenberg) w/10 propos*	1
(Ted Greenberg) w/10 recommend*	0
(Ted Greenberg) w/10 report*	0
(Ted Greenberg) w/10 request*	0
(Ted Greenberg) w/10 respon*	8

Search Term	Count
(Ted Greenberg) w/10 review	0
(Ted Greenberg) w/10 said	0
(Ted Greenberg) w/10 say*	0
(Ted Greenberg) w/10 spoke*	0
(Ted Greenberg) w/10 state*	0
(Ted Greenberg) w/10 talk*	0
(Ted Greenberg) w/10 tell	0
(Ted Greenberg) w/10 told	0
(Ted Greenberg) w/10 writ*	5
(Ted Greenberg) w/10 wrote	0
(WUmonitor@gmail com) and (5 %)	0
(WUmonitor@gmail com) and (5 per cent)	0
(WUmonitor@gmail com) and (5 percent)	0
(WUmonitor@gmail com) and (agent oversight)	0
(WUmonitor@gmail com) and (Business Solutions)	0
(WUmonitor@gmail com) and (Custom House)	0
(WUmonitor@gmail com) and (five per cent)	0
(WUmonitor@gmail com) and (five percent)	0
(WUmonitor@gmail com) and (Implementation Plan)	0
(WUmonitor@gmail com) and (know your agent)	0
(WUmonitor@gmail com) and (money order)	0
(WUmonitor@gmail com) and (Periodic Review*)	0
(WUmonitor@gmail com) and (pre-paid)	0
(WUmonitor@gmail com) and (risk assessment*)	0
(WUmonitor@gmail com) and (Western Union Business Solutions)	0
(WUmonitor@gmail com) and (WU Business Solutions)	0
(WUmonitor@gmail com) and 5%	0
(WUmonitor@gmail com) and interdict*	0
(WUmonitor@gmail com) and KYA	0
(WUmonitor@gmail com) and MIP*	0
(WUmonitor@gmail com) and prepaid	0
(WUmonitor@gmail com) and Recommendation*	0
(WUmonitor@gmail com) and Travelex	0
(WUmonitor@gmail com) and WUBS	0
(WUmonitor@gmail com) w/10 ask*	0
(WUmonitor@gmail com) w/10 call*	0
(WUmonitor@gmail com) w/10 demand*	0
(WUmonitor@gmail com) w/10 email*	0
(WUmonitor@gmail com) w/10 e-mail*	0
(WUmonitor@gmail com) w/10 evaluat*	0
(WUmonitor@gmail com) w/10 plan	0
(WUmonitor@gmail com) w/10 propos*	0
(WUmonitor@gmail com) w/10 recommend*	0
(WUmonitor@gmail com) w/10 report*	0
(WUmonitor@gmail com) w/10 request*	0
(WUmonitor@gmail com) w/10 respon*	0
(WUmonitor@gmail com) w/10 review	0
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(WUmonitor@gmail com) w/10 say*	0
(WUmonitor@gmail com) w/10 spoke*	0
(WUmonitor@gmail com) w/10 state*	0
(WUmonitor@gmail com) w/10 talk*	0
(WUmonitor@gmail com) w/10 tell	0
(WUmonitor@gmail com) w/10 told	0
(WUmonitor@gmail com) w/10 writ*	0
(WUmonitor@gmail com) w/10 wrote	0
(WUmonitor2012@gmail com) and (5 %)	0
(WUmonitor2012@gmail com) and (5 per cent)	0
(WUmonitor2012@gmail com) and (5 percent)	0
(WUmonitor2012@gmail com) and (agent oversight)	0
(WUmonitor2012@gmail com) and (Business Solutions)	0
(WUmonitor2012@gmail com) and (Custom House)	0
(WUmonitor2012@gmail com) and (five per cent)	0
(WUmonitor2012@gmail com) and (five percent)	0
(WUmonitor2012@gmail com) and (Implementation Plan)	0
(WUmonitor2012@gmail com) and (know your agent)	0
(WUmonitor2012@gmail com) and (money order)	0
(WUmonitor2012@gmail com) and (Periodic Review*)	0
(WUmonitor2012@gmail com) and (pre-paid)	0

Search Term	Count
(WUmonitor2012@gmail.com) and (risk assessment*)	0
(WUmonitor2012@gmail.com) and (Western Union Business Solutions)	0
(WUmonitor2012@gmail.com) and (WU Business Solutions)	0
(WUmonitor2012@gmail.com) and 5%	0
(WUmonitor2012@gmail.com) and interdict*	0
(WUmonitor2012@gmail.com) and KYA	0
(WUmonitor2012@gmail.com) and MIP*	0
(WUmonitor2012@gmail.com) and prepaid	0
(WUmonitor2012@gmail.com) and Recommendation*	0
(WUmonitor2012@gmail.com) and Travelex	0
(WUmonitor2012@gmail.com) and WUBS	0
(WUmonitor2012@gmail.com) w/10 ask*	0
(WUmonitor2012@gmail.com) w/10 call*	0
(WUmonitor2012@gmail.com) w/10 demand*	0
(WUmonitor2012@gmail.com) w/10 email*	0
(WUmonitor2012@gmail.com) w/10 e-mail*	0
(WUmonitor2012@gmail.com) w/10 evaluat*	0
(WUmonitor2012@gmail.com) w/10 plan	0
(WUmonitor2012@gmail.com) w/10 propos*	0
(WUmonitor2012@gmail.com) w/10 recommend*	0
(WUmonitor2012@gmail.com) w/10 report*	0
(WUmonitor2012@gmail.com) w/10 request*	0
(WUmonitor2012@gmail.com) w/10 respon*	0
(WUmonitor2012@gmail.com) w/10 review	0
(WUmonitor2012@gmail.com) w/10 said	0
(WUmonitor2012@gmail.com) w/10 say*	0
(WUmonitor2012@gmail.com) w/10 spoke*	0
(WUmonitor2012@gmail.com) w/10 state*	0
(WUmonitor2012@gmail.com) w/10 talk*	0
(WUmonitor2012@gmail.com) w/10 tell	0
(WUmonitor2012@gmail.com) w/10 told	0
(WUmonitor2012@gmail.com) w/10 writ*	0
(WUmonitor2012@gmail.com) w/10 wrote	0
(Wyn Clark) and (5 %)	0
(Wyn Clark) and (5 per cent)	0
(Wyn Clark) and (5 percent)	0
(Wyn Clark) and (agent oversight)	0
(Wyn Clark) and (Business Solutions)	0
(Wyn Clark) and (Custom House)	0
(Wyn Clark) and (five per cent)	0
(Wyn Clark) and (five percent)	0
(Wyn Clark) and (Implementation Plan)	0
(Wyn Clark) and (know your agent)	0
(Wyn Clark) and (money order)	0
(Wyn Clark) and (Periodic Review*)	0
(Wyn Clark) and (pre-paid)	6
(Wyn Clark) and (risk assessment*)	20
(Wyn Clark) and (Western Union Business Solutions)	0
(Wyn Clark) and (WU Business Solutions)	0
(Wyn Clark) and 5%	22
(Wyn Clark) and interdict*	25
(Wyn Clark) and KYA	20
(Wyn Clark) and MIP*	16
(Wyn Clark) and prepaid	0
(Wyn Clark) and Recommendation*	14
(Wyn Clark) and Travelex	0
(Wyn Clark) and WUBS	20
(Wyn Clark) w/10 ask*	0
(Wyn Clark) w/10 call*	0
(Wyn Clark) w/10 demand*	0
(Wyn Clark) w/10 email*	0
(Wyn Clark) w/10 e-mail*	0
(Wyn Clark) w/10 evaluat*	0
(Wyn Clark) w/10 plan	0
(Wyn Clark) w/10 propos*	0
(Wyn Clark) w/10 recommend*	0
(Wyn Clark) w/10 report*	0
(Wyn Clark) w/10 request*	0
(Wyn Clark) w/10 respon*	0

Search Term	Count
(Wyn Clark) w/10 review	0
(Wyn Clark) w/10 said	0
(Wyn Clark) w/10 say*	0
(Wyn Clark) w/10 spoke*	0
(Wyn Clark) w/10 state*	0
(Wyn Clark) w/10 talk*	0
(Wyn Clark) w/10 tell	0
(Wyn Clark) w/10 told	0
(Wyn Clark) w/10 writ*	0
(Wyn Clark) w/10 wrote	0
*@WUmonitor.com	69
Dennis Lormel	74
Douglas Meadows	2
Ernest Sohn	0
JD Hannick	0
Jeff Hunter	0
John Bell	104
John De Wulf	0
John Knapp	52
Lisa Dawson	0
Lonnie Keene	33
Matt Derstine	0
Michael Ledley	0
Nick Nahas	0
Patrick Mahon	1
Paul Lewis	74
Rachele Byrne	0
Reynold Benjamin	0
Ricki Conrey	2
Robert Silbering	0
Sarah Schuyler	19
Steven Escaravage	0
Ted Greenberg	56
WUmonitor@gmail.com	0
WUmonitor2012@gmail.com	0
Wyn Clark	26
Entire Set	5438

CONTEMPT EXHIBIT 8

E-mail from Jose Gonzales-Magaz (Western Union)
to Burke Kappler and Leslie Rice Melman (FTC)

September 12, 2013

Kappler, Burke

From: Gonzalez-Magaz, Jose <jrgonzalez@step toe.com>
Sent: Thursday, September 12, 2013 5:13 PM
To: Melman, Leslie R.; Kappler, Burke
Cc: Schwartz, Edward
Subject: Western Union CID -- Status of Processing the Email of the 32 Custodians

Leslie and Burke,

United Lex has received from Western Union, and has processed, the email for the following custodians:

1. Ayres, Nicole
2. Baugh, Hollis
3. Brandt, Noel
4. Cachey, Joe
5. Carratala, Phillip
6. Enzaldo, Robert
7. Holcomb, David
8. Hopkins, Phil
9. Krollman, Richard

United Lex has also received, but has not completed the processing of the email for the following:

1. Axelrod, Cherie
2. Baughman, Janet
3. Bingham, Mike
4. Borteletto, Tarcisio
5. Deering, Troy
6. Desmond, Kathy
7. Dieffenbach, Eric
8. Hall, Alec
9. Koch, Barry
10. Mayfield, Becky

Kind regards,

José Ramón González-Magaz
Partner
jrgonzalez@step toe.com

Step toe

+1 202 429 8110 direct Steptoe & Johnson LLP
+1 240 277 1112 mobile 1330 Connecticut Avenue, NW
+1 202 261 0598 fax Washington, DC 20036
www.step toe.com

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CONTEMPT EXHIBIT 9

Letter from Burke Kappler (FTC) to Edward B. Schwartz and
Jose Gonzales-Magaz (Western Union)

October 18, 2013



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Burke W. Kappler
Attorney
Office of General Counsel

Direct Dial: 202-326-2043
Fax : 202-326-2477
E-mail: bkappler@ftc.gov

October 18, 2013

BY E-MAIL AND FEDEX

Edward B. Schwartz, Esq.
Jose Ramon Gonzalez-Magaz, Esq.
Steptoe & Johnson, LLP
1330 Connecticut Avenue, NW
Washington DC 20036
eschwartz@steptoe.com
jrgonzalez@steptoe.com

RE: FTC v. The Western Union Company, et al., 13-mc-0131-AKH (S.D.N.Y. 2013)

Dear Ed and Jose:

It has been over two months since the FTC gave Western Union a final search protocol that Western Union, pursuant to the district court's order of June 7, was required to run to locate responsive materials that Western Union has stored in electronic form. We arrived at the final search protocol only after a careful study of the Monitor's reports and recommendations, and after consulting with the Monitor as well as FTC litigation support personnel. Those efforts enabled us to identify which Western Union employees communicated with the Monitor or considered his recommendations, and what terms they used in those communications and in internal Western Union discussions of his recommendations. In this fashion, we settled on a set of custodians and selected search terms that would – to the extent possible – identify those documents responsive to Specification 2 of the outstanding CID – namely, documents “referring or relating to communications with the Monitor.” As set forth in greater detail below, and in our August 8 letter, we continued to expend substantial resources to further refine that search protocol notwithstanding Western Union's failure to provide reasons or support for its contention that the FTC's selection of custodians was inappropriate or that the search terms were over- or underinclusive. Indeed, the only information Western Union provided was a “hit report” that was based on a test run of FTC proposed search terms against the document collections of only three custodians.

While refusing to provide the Commission with information that might enable the Commission to further tailor the search terms, Western Union has continued to object to the cost of running the final protocol. We do not view the protocol as unduly burdensome or costly for a company as large as Western Union. Nonetheless, in the interests of moving the investigation along and obviating the need for the Commission to return to the district court for further relief, we have two options for Western Union to consider. With Option 2, we've attempted to address the supposed burden and respond to WU's complaints about the costs of running the search protocol. Before jumping into the details of those options, I would like to summarize how we got to this point.

1. August 8 letter and final search protocol.

On August 8, the FTC gave Western Union the final search protocol for documents "referring or relating to communications with the Monitor," as provided in the district court's order of June 7. That protocol required Western Union to make an initial production within 15 days. It also provided Western Union with a schedule for a rolling production to be completed by October 31.

In developing the search protocol, the Commission endeavored, to the extent possible, to take into account Western Union's concerns about cost. The Commission did this despite Western Union's failure to provide the "statement of specific reasons for its position and supporting data," as required by the enforcement order. Indeed, as discussed in our August 8 letter, we identified custodians and search terms only after conducting a detailed review of the Monitor's reports and in-depth discussions with the Monitor. Western Union continued to object to the number of custodians and cost of compliance. FTC staff then engaged in further discussions with the Monitor. Ultimately, we cut the number of custodians almost in half (from 135 to 74), and further adjusted the search terms in response to Western Union's concerns.

Western Union did not comply with this protocol, did not make an initial production within 15 days, and did not provide a schedule for completion by October 31, 2013. Instead, on August 27, 2013, Western Union responded with projections of the cost and timing of the production. Based on an analysis of only three custodians, Western Union extrapolated that the entire production would require the review of over 1.8 million documents, at a cost of over \$3.7 million. Western Union stated that it did not expect to meet the October 31, 2013 deadline, though it provided no more definitive date, or even an estimate, for completion of production.

Western Union also asked the Commission to further reduce the number of custodians and to eliminate certain search terms. To support its request for reductions in the number of search terms, Western Union provided a report from its vendor, UnitedLex, that captured the number of hits for each combination of search terms for only 3 of the 74 custodians the FTC had selected.¹ To date, however, Western Union has provided no support for its requests for

¹ These three custodians were selected on the premise that one (Noel Brandt) worked closely with the Monitor and was likely to have many responsive documents, the second (Mark Porter) had more limited contact and would have fewer documents, and the third (Jean Claude Farah), a Western Union manager with no direct tie to the Monitor,

reductions in the number of custodians.² Based on this August 27 letter and report, Western Union asked for an additional meet-and-confer and we agreed.

2. September 10, 2013 meet-and-confer.

A. New information about e-mail conversion project.

We met again on September 10, 2013. At the meeting, Western Union disclosed *for the first time* that it was in the middle of a project to convert and upgrade its e-mail system and supporting servers from Lotus Notes to Microsoft Exchange. Western Union contended that the conversion project required the company to search for e-mail for each identified custodian *twice* – once in the older, “legacy” system, and then again in the new system – thereby increasing its retrieval costs and delaying the required production.³ You indicated that counsel had become aware of this project at an earlier point in time, had thought about informing the FTC, but decided against it. In failing to disclose this information at the earliest opportunity, Western Union effectively cut off an opportunity for Western Union and FTC litigation support personnel to collaborate on a “work around” that would enable Western Union to move forward in a more efficient manner with its extraction of emails. We believe Western Union was required to take such steps, given that it has been under court order since June 7.

B. New requests for changes to the search protocol.

At our meeting, Western Union renewed its request for further reductions in the number of search terms. Specifically, Western Union asked the FTC to eliminate all search terms that referred to substantive concepts or topics discussed in the Monitor’s reports and recommendations, notwithstanding the fact that the Monitor himself had indicated that such terms would capture documents referring or relating to his communications with Western

would have the fewest number of responsive documents. Western Union did not seek input from the FTC before it selected these custodians and developed this report.

² Western Union has stated repeatedly that the appropriate number of custodians is 32, though it has provided no information to support this number or explain why those individuals are likely to have a comprehensive set of responsive documents. In fact, Western Union’s insistence on 32 custodians is inconsistent with its own representations to the district court that the appropriate number of custodians was between 52 and 57. See Decl. of Richard Krollman, Dkt. 21-1 at 9 (55 people had contact with Monitor); Decl. of Lisa Lewis, Dkt. 21-2 at 4-5 (52 people had some relation to the Monitorship); Tr. at 24 (“no fewer than 57 custodians whose e-mails would have to be searched”). Though Western Union has repeatedly stated that it will offer information to explain why the FTC’s longer list – which was prepared with the assistance of the Monitor – is overinclusive, it has not done so to date. Western Union has merely complained about cost.

³ Further, because the e-mails would be in two different file formats, Western Union would be unable to perform typical de-duplication to screen out multiple copies of the same e-mail and would be required to perform a “near-de-duplication.” Because “near-de-duplication” does not screen out duplicate e-mails to the same degree as de-duplication, Western Union claimed this would result in more e-mails to review.

Union.⁴ Western Union asked the FTC to agree to remove these terms entirely even though the company had no information to suggest that these search terms would “hit” nonresponsive documents, and even though its own vendor report showed substantial numbers of hits on some of the terms.⁵

In addition to reiterating its unsubstantiated request for changes in the search protocol, Western Union, despite being under court order since June 7, it became clear at our meeting that Western Union had only retrieved and processed e-mail for approximately 20 of the 74 custodians identified by the FTC. You indicated that Western Union would not begin review of this information without a further agreement to reduce the search terms. In actuality, as revealed in a subsequent e-mail, the representation that Western Union had retrieved and processed electronically stored information for approximately 20 of the 74 custodians was incorrect. In fact, Western Union had only completed retrieval and processing for 9 custodians, and 10 additional custodians had been collected but not yet processed.

C. Western Union’s attempt to narrow the scope of Specification 2 of the CID.

At our meeting, you also announced – for the first time – that, in identifying responsive documents, Western Union intended to apply an erroneous and unacceptably narrow interpretation of Specification 2 of the CID. According to Western Union, this Specification called only for documents that referred to or discussed a specific communication with the Monitor. Thus, in Western Union’s newly advanced view, documents that only referred to information from or communications with the Monitor generally, without ascribing that information to a specific communication, would not be responsive.

Western Union’s attempt to circumscribe the scope of the CID, coming four months after the parties completed their briefing before the district court and more than eight months after Western Union’s administrative petition to quash, cannot be squared with the plain terms of the CID, or even with Western Union’s own arguments advanced at an earlier point in these

⁴ These search terms are numbers 24-47 at Att-5 – Att-6 in the August 8 final search protocol. Western Union asked in the alternative if the FTC would agree to replace the “and” connector in search terms 24-47 with a proximity limiter, such as “w/10,” but has provided no data or information to support this request either.

⁵ For example, Western Union asked the FTC to set aside the search term of “5%,” a key concept appearing in the Monitor’s reports and recommendations. The UnitedLex report, though, shows the following numbers of hits for the combination of “Monitor” and “5%”:

Noel Brandt:	7,797 hits
Mark Porter:	2,420 hits
Jean Claude Farah:	1,094 hits

These are significant numbers of hits even for those individuals that Western Union expected would have fewer responsive documents, such as Mr. Farah. See UnitedLex report at 51; Western Union Letter of Aug. 27, 2013, at 2 n.1.

proceedings to the Commission and the district court. Western Union's narrow interpretation is erroneous in light of the CID's definition of the phrase, "referring or relating to" – namely, "discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning or pertaining to, in whole or in part." Indeed, Western Union previously complained to both the Commission and the district court that this aspect of the CID was overbroad.⁶ Western Union's last minute reinterpretation of the CID specification, advanced only after the Commission and the district court rejected its arguments on overbreadth, is untimely and incorrect.

3. Options for moving forward

Having carefully reviewed and considered all the available information and the views you have advanced on Western Union's behalf, it is clear that there is no basis for the Commission to further reconsider either our carefully constructed search terms or the roster of 74 custodians.

We understand that Western Union objects to the projected \$3.7 million cost to search, review, and produce documents in compliance with the June 7 Order. This estimate of cost has not been supported by anything other than self-serving assertions. Moreover, we do not see this amount as unduly costly for a company of Western Union's size, particularly where the costs appear to result largely from Western Union's own business decisions or factors beyond the Commission's control – for example, Western Union's failure to implement adequate systems for electronically stored materials, the large number of employees (over 100) involved in communications with the Monitor, and Western Union's decision to undertake or continue a conversion of its e-mail system without consulting with FTC counsel while subject to a civil investigative demand.⁷

We see two options for proceeding forward short of the Commission seeking further relief from the district court:

Option 1:

- Western Union will execute the protocol described in our August 8 letter, begin a rolling production immediately, and provide the Commission with a schedule for completing production by a due date of November 18. Western Union will provide the certification required by the court's order after it completes production.

Option 2:

- Western Union will produce to the FTC all of the documents collected for each of the 74 custodians without any search or review of those documents. In your August 27

⁶ See Dkt. 21 at 14-15; Tr. at 21.

⁷ You have acknowledged that the conversion project has been ongoing throughout our discussions about Western Union's compliance with the CID.

letter, you estimate that this collection would consist of 3,591 GB of data and include 14,420,996 documents (including e-mails and attachments). The FTC will then search and review the documents for responsive materials using its own e-discovery tools. This option transfers the bulk of the cost from Western Union to the FTC – thereby addressing Western Union’s main objection to the final search protocol.

- To protect Western Union’s privileged documents, prior to any search or review by investigating staff, the FTC will perform a privilege screen using procedures similar to those developed by the FTC in other matters – *e.g.*, where the producing party has resource constraints. In such cases, the screen is performed by a screening team composed of FTC attorneys and/or paralegals separate from the investigating staff. This screening team will search the document collection for names and identifiers for Western Union in-house and outside counsel, sequester any documents that appear to be potentially privileged, and then provide Western Union a log of the potentially privileged documents, along with copies of the documents themselves. This will enable Western Union to complete its privilege log for those documents for which it intends to claim privilege. Further, the FTC will allow Western Union to “claw back” any additional documents over which it intends to claim privilege and will provide Western Union with a clawback order to be entered by Judge Hellerstein pursuant to Federal Rule of Evidence 502.⁸ Indeed, in our last meeting, Ed had mentioned the possibility of producing documents without review as a means of reducing costs. The use of an electronic privilege screen and clawback order protects any Western Union privilege claims while enabling an expedited production of documents.
- We expect production to be complete by November 18, 2013. This deadline takes into account the 16-day period of the government shutdown. We also expect a privilege log and required certificate of compliance no later than by December 31, 2013.

⁸ See *Zubulake v. UBS Warburg LLC*, 216 F.R.D. 280, 290 (S.D.N.Y. 2003) (Scheindlin, J.) (“[M]any parties to document-specific litigation enter into so-called ‘claw-back’ agreements that allow the parties to forego privilege review altogether in favor of an agreement to return inadvertently produced privileged documents.”) The combination of a screening team and a clawback agreement would exceed the protections contemplated in *Zubulake*.

Both FTC staff and senior management are concerned with Western Union's failure to fulfill its obligation to fully comply with the district court's order of June 7. Nonetheless, because Option 2 would address Western Union's objections to the cost of compliance, we urge you to give it serious consideration. Western Union should inform us of how it wishes to proceed no later than Friday, October 25. If you would like to meet and discuss, we are, of course, available to do so at your earliest convenience prior to October 25.

Sincerely,



Burke W. Kappler

cc:

Todd Kossow, Esq. (by e-mail to tkossow@ftc.gov)

Karen Dodge, Esq. (by e-mail to kdodge@ftc.gov)

Leslie Rice Melman (by e-mail to lmelman@ftc.gov)

CONTEMPT EXHIBIT 10

Letter from Edward B. Schwartz (Western Union) to Burke
Kappler and Leslie Rice Melman (FTC)

October 29, 2013

Edward B. Schwartz
202 429 6220
eschwartz@steptoe.com

Steptoe
STEPTOE & JOHNSON LLP

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
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October 29, 2013

BY EMAIL AND FEDEX

Burke W. Kappler, Esq.
Office of General Counsel
U.S. Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

Leslie R. Melman, Esq.
Assistant General Counsel
for Litigation
U.S. Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

Re: FTC v. The Western Union Company, et al., 13-mc-0131-AKH (S.D.N.Y. 2013)

Dear Burke and Leslie:

We are writing in response to your October 18, 2013 letter and the two alternative proposals for resolving our differences about the search protocol that Western Union would use to complete its production under CID Specification 2. We are also taking this opportunity to set the record straight with respect to Western Union's efforts to comply with the CID and the Court's June 7, 2013 Order and the parties' communications regarding the issues relating thereto. We also offer a reasonable and practical compromise that would resolve the present dispute and enable Western Union to move forward with its processing, review and production of the materials it has collected in response to Specification 2.

I. Background

Since the parties began negotiations over the search protocol the Commission proposed on August 8, Western Union has worked diligently and in good faith with Commission staff to agree to a search protocol that would provide the Commission with the documents it is seeking under the CID without imposing enormous and unwarranted burdens upon Western Union. The company has made a substantial effort, at significant expense, to evaluate the two key elements of the FTC's proposed search protocol: (1) the 74 custodians whose files you insist Western

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Union search; and (2) the 1,692 different searches of those files that the FTC is insisting that Western Union run.

To undertake this assessment and to assist the company in resolving the enormous technical problems posed by the Commission's extraordinarily broad proposal, Western Union hired, at substantial expense, an electronic discovery consulting firm to assist in evaluating your August 8 proposal and responding to your requests. You met with one of those expert consultants and have given us no indication that you doubted the capabilities of this firm, the nature or magnitude of the technical problems that they told you were raised by the Commission's proposal, the steps they have had to take to resolve those technical problems or the veracity of the information they have provided. Indeed, and as Western Union's expert told you during that meeting, even evaluating the burden of the proposal has proved difficult because the volume of data involved is so vast and the number of custodians and search terms proposed are so extensive that the Western Union email journaling system could not process the data requests without crashing. At the end of the presentation by Western Union's expert, we invited your own experts to speak further with Western Union's expert to make sure that the Commission understood the technical problems raised and the costs imposed by the Commission's proposal. We have heard nothing from you or your own electronic discovery experts to follow up on this offer.

As we have explained to you, Western Union, working together with counsel and its electronic discovery consultant, assessed: (1) the extent to which the Commission's August 8 search proposal constitutes a reasonably efficient means of locating responsive documents; and (2) the financial and other burdens imposed by following that protocol. The company has provided you with its analysis demonstrating it would cost Western Union over \$3.7 million to comply with the FTC's proposal – an estimate that you have not questioned. Rather, your response has been “Western Union can handle it – it's a big company.” In addition to detailing the burdens associated with the FTC's proposal, the company has demonstrated that the Commission's proposal is enormously overbroad and represents a very inefficient way of locating responsive documents.

Thus, your letter's suggestions that Western Union has been engaging in foot-dragging, and has failed to provide the Commission with any explanations for its objections to the Commission's protocol, are misplaced. Your letter also misrepresents the record both with respect to the efforts that Western Union has made to satisfy its obligations under the CID and the Court's Order and to communicate with the Commission regarding the bases for the company's objections to adopting the August 8 protocol. Your letter also ignores the facts about the Commission's efforts to craft the August 8 protocol, and regarding the nature of that proposal. Just by way of example:

- You state on page 1 of your letter that your August 8 proposed list of 74 Western Union custodians is limited to those employees who “communicated with the Monitor

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or considered his recommendations” and that Western Union has failed “to provide reasons or support for its contention that the FTC’s selection of custodians was inappropriate.” Not so. We have had numerous and detailed discussions about these very issues during which you conceded that “Western Union knows what its employees have been doing, we don’t.” During those same conversations, we also discussed why we believed the FTC’s approach to identifying the custodians was flawed and provided you with specific examples of custodians included on your list who were not in a position to have any documents that would shed light on how seriously the company was taking its obligations to comply with the Southwest Border Agreement (the putative relevance of these documents). Finally, and as discussed below, Western Union can demonstrate that at least 17 of the Western Union employees on your list had no involvement whatsoever in communicating with the Monitor about his recommendations or in considering them. In other words, your list reflects a desire to engage in a fishing expedition, at a great cost to Western Union, as opposed to an effort to target the documents the FTC claims to need.

- You also assert in your letter that Western Union has failed to “provide reasons or support for its contention that the FTC’s proposed August 8 search terms were over- or underinclusive” (page 1) and that Western Union has “refus[ed] to provide the Commission with information that might enable the Commission to further tailor the search terms” (page 2). Those assertions ignore the numerous conversations we have had on this topic as well – including in your offices as recently as September 10, during which we (a) discussed this specific issue; (b) gave you precise examples as to why many of your proposed search terms were over-inclusive, as they bear no relation, in any way, to “communications” with the Monitor; and (c) advised you that, together with the Western Union electronic discovery vendor, we were running tests of the search terms. When we attempted to have a follow-up meeting with you to discuss the results of these tests before the government shutdown, you sent us an email on September 24 asking us to hold off, as you were working on a “creative solution.” I sent you an email and left a voicemail message for you on October 1 in an effort to follow up on the creative solution. However, we have yet to receive that solution.

In addition to attempting to re-write the history of the Western Union’s efforts and the parties’ communications, your October 18 letter indicates that the Commission has now, at this late point in the parties’ negotiations, decided to abandon its previous efforts to work with Western Union and instead insists that Western Union choose between two illusory options: produce all documents responsive to the Commission’s overbroad requests and search protocol by November 18 or agree to waive all privileges so that the Commission can review Western Union’s privileged documents and make privilege determinations itself. As discussed further below, those options do not reflect a good faith effort to resolve the parties’ differences and do not present Western Union with a real choice.

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By contrast, Western Union presents below a practical, fair and reasonable compromise proposal for resolving the parties' differences. It will cost the company well over \$1 million to satisfy its Specification 2 obligations under Western Union's proposal: a burden that cannot possibly be justified given the *at best* tenuous relevance of the documents being sought and produced. Nevertheless, it provides the Commission with the documents that it is seeking under Specification 2, while avoiding millions of dollars in costs that would result from the Commission's overbroad and inefficient search proposal.

We discuss these issues in further detail below.

II. History of the Parties' Negotiations

The CID contains two specifications. Western Union has nearly completed its production in response to the first specification, which calls for documents relating to complaints made to Western Union by consumers whose money transfers were induced by fraud.¹ Specification 2 requests documents relating to communications with a Monitor appointed by an Arizona state court to oversee Western Union's anti-money laundering program along the southwest border. The FTC asserts that it needs these documents in order to assess the extent to which Western Union takes its anti-money laundering compliance obligations (over which the FTC has no jurisdiction) seriously. Western Union has produced over 6,700 documents responsive to Specification 2, including the Monitor reports and all direct communications between the company and the Monitor and his team. Western Union has objected, however, to the FTC's unreasonably broad search protocol with respect to documents "referring or relating to communications with the Monitor."

Pursuant to the Court's June 7 order, Western Union sent the FTC a letter on June 20, 2013, proposing a protocol for searching for, identifying and producing responsive documents relating to communications with the Monitor. The FTC responded approximately *one month* later, on July 17, 2013, with its own proposed search protocol. Western Union responded five days later, providing specific reasons for its position that the FTC's proposed list of custodians and search terms were over-inclusive. *See* July 22, 2013 letter at 4-5. For example, Western Union demonstrated that a number of the proposed custodians have no responsibility for the southwest border, noting that they work overseas and have no duties relating to the southwest border or because they work in the Human Resources Department. Nevertheless, to move the process forward, Western Union submitted a revised protocol that included an expanded list of custodians and search terms.

¹ The company has kept you well informed throughout the process of the issues that company has faced in satisfying its obligations under Specification 1. As you know, technical issues have delayed the Company's production from one database. Many weeks ago, the company produced the vast majority of the documents responsive to Specification 1.

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After receiving the FTC's July 17 letter, Western Union's information technology staff and paralegals attempted to run the FTC's proposed search protocol to extract potentially responsive emails from the company's email journaling systems. However, that process consistently crashed the company's systems. In addition, when a search ran its course, the results were unreliable as to obtaining the totality of the email set. The searches also coincided with Western Union's long-planned updating of its email journaling system, which entailed transferring the company's older emails from a Lotus Notes server to a more modern Microsoft Outlook platform. Western Union informed the FTC of these issues in its July 22, 2013 letter.² Facing these challenges, Western Union engaged UnitedLex, a national electronic data processing service provider, to extract the emails from both the email archive that contained Lotus Notes and Microsoft Outlook data and to process the search protocol using that vendor's specialized software.

The parties attended a meet and confer on July 30, 2013 to negotiate their differences. At that meeting, counsel for Western Union advised that the company was upgrading its email journaling system and migrating to a new server. Western Union then sent a follow-up letter on August 7, 2013, providing a more detailed explanation as to why the FTC's proposed list of custodians and search terms were overbroad and over-inclusive and explaining the technical challenges and burdens. Western Union estimated that collecting, processing, reviewing and producing the emails for even the agreed-upon 32 custodians would cost over \$3 million.

The FTC subsequently sent a letter on August 8, 2013, in which it agreed that extracting data from the 135 custodians as it had originally proposed was excessive, but still demanded that Western Union collect documents from 74 custodians and that it use many more search terms than the Commission had previously proposed, requiring Western Union to run *nearly 1,700 different searches*. The parties spoke by telephone that same day, during which the FTC requested additional information to support Western Union's position that the disputed additional custodians and search terms were overbroad.

² See July 22, 2013 letter at 5 (stating both that "Western Union's ability to analyze the burdens associated with the FTC's proposal [] has been hampered by the cumbersome nature of the FTC's proposal" and that "because of maintenance, Western Union's email journaling system was not available for searching during a large portion of the five-day response period").

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On August 27, 2013, Western Union sent another letter to the FTC, detailing the reasons why the proposed search protocol was overbroad.³ *See* Aug. 27, 2013 letter at 2-5. Western Union described how UnitedLex searched the email for a representative sample of custodians based on the FTC's proposed search terms. Extrapolating from those results, Western Union estimated that the use of the FTC's proposed protocol would require the review of approximately 1.9 million files. That letter also invited the FTC to speak directly with Western Union's outside data processing vendor to better understand and verify the technical challenges that Western Union is facing. *Id.* at 1.

The parties continued their negotiations and were in regular communication regarding the scope of the search protocol and other issues. On September 4, 2013, the FTC sent a letter to Western Union raising certain issues regarding Western Union's privilege log for its initial production of direct Monitor communications. The FTC indicated that it would respond separately to Western Union's August 27, 2013 letter regarding the scope of the search protocol.

The parties had another meet and confer on September 10, 2013, during which a UnitedLex representative explained the technical challenges posed in data extraction, processing, and running the complex searches the FTC was seeking. Western Union also notified the FTC that it was not prepared to run searches and produce documents in a piecemeal fashion regarding Specification 2, due to the cost and complexity of having to redo searches if the parties later reached agreement on different search terms. The FTC expressed no objection to Western Union's approach (and acknowledges its understanding of Western Union's approach in its October 18 letter at page 4). In addition, Western Union pointed out that the FTC impermissibly sought to expand the scope of the Court order by proposing search terms that effectively delete the requirement that a responsive document must refer or relate to a communication with the Monitor.⁴ At that meeting, counsel for the FTC voiced the position – for the first time – that, since the Monitor is not part of Western Union, any internal email at Western Union that relates

³ For the proper context, the protocol proposed by the FTC in its August 8 letter entails running, for each custodian, each of the 10 base search terms against the 47 "limiting" terms, each of which contains several items to be searched. Thus, the process actually entails searching for 1,692 terms. Indeed, to assess the complexity of the FTC's proposed search protocol and its rate of effectiveness, Western Union's data processing service provider, UnitedLex, ran such terms against the data for a sample of 3 custodians, and generated a Search Term Hit Report, which was provided to the FTC with Western Union's August 27, 2013 letter. As reflected in that Search Term Hit Report, 657 of the 1,692 term searches had zero keyword hits (did not yield a file); 393 of the terms only yielded one keyword hit; and 61 of the terms only yielded 2 keyword hits.

⁴ For example, multiple search term combinations proposed by the FTC bear no relation to communications, such as a search for common names such as "Ted" or "Greenberg" (a name shared by both the Monitor and the Chairman of Western Union's Board of Directors) appearing in the same document as "Western Union Business Solutions" or "prepaid." Not only do such searches bear no relation to communications, they are incredibly over-inclusive and likely to yield an excessive number of irrelevant documents.

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to the Monitor must necessarily involve a communication with him; meaning that any internal communication regarding the Monitor by definition “referred or related” to communications with the Monitor. Counsel for Western Union observed that the FTC’s proposed interpretation of Specification 2 of the CID would require reading its text as if the word “communication” has been deleted.

On September 24, 2013, Western Union responded to the FTC’s letter on privilege issues, explaining why certain documents shared with the Monitor and the Arizona Attorney General were privileged, and how further disclosure to the FTC would threaten to waive this privilege. Also on September 24, and immediately following the parties’ mediation before the Second Circuit, Western Union sought to schedule a call with the FTC to keep moving forward on a solution to these issues. The FTC responded in an email to Western Union that no call was necessary because it “might have a creative solution” to resolve the parties’ differences discussed at the September 10, 2013 meet and confer, which it would get to Western Union in the next few days. A week later, on October 1, 2013, Western Union had not yet received further information from the FTC, I called and emailed both of you to ask about the status of your “creative solution” and advised that at your request we were still on hold with respect to providing you with more information and our production. The federal government shut down this day after Congress failed to enact a continuing resolution.

In a letter dated October 18, 2013, two days after the government shut-down ended, the FTC remarkably characterized its own failure to respond as promised to Western Union’s August 27, 2013 letter as an intentional delay on the part of Western Union – despite the parties’ ongoing negotiations and despite Western Union’s preparation of detailed reports to the FTC regarding the disputed custodian and search term issues. The FTC’s October 18 letter inaccurately summarizes the parties’ negotiations history and provides Western Union with a Hobson’s choice: (1) execute the overly broad protocol provided in the FTC’s August 8 letter and complete production by November 18, 2013; or (2) produce everything without first reviewing it for responsiveness or privilege and allow the FTC to identify the privileged documents in the production. The letter required that Western Union select an option by October 25, 2013. As explained below, production by November 18 is simply not possible given the scope of the FTC’s protocol, even if the parties were able to resolve the search protocol issues immediately. Option 2 would result in waiver of Western Union’s privilege over the materials produced, making it an unacceptable alternative.

III. Outstanding Compliance Issues Present Material Concerns to Western Union

A. Irrelevant and Duplicative Custodians

From the outset, Western Union identified a major concern with the FTC’s protocol – the intensive data collection from an overly broad number of Western Union employees and former

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employees, many of whom had no contact with the Monitor and no responsibilities with respect to the southwest border Monitorship.⁵

In its October 18, 2013 letter, the FTC takes the position that “[t]o date . . . Western Union has provided no support for its requests for reductions in the number of custodians.” (Oct. 18, 2013 letter at 2-3.) Yet, as early as July 22, 2013, Western Union provided detailed and reasoned objections with respect to specific proposed custodians. *See, e.g.*, Western Union’s July 22, 2013 letter to FTC at 4.

At the FTC’s request, Western Union set about interviewing the additional 42 custodians proposed by the FTC and compiling even more extensive data regarding its objections to the FTC’s proposal as to such additional custodians. Western Union’s analysis demonstrates that out of the 42 additional proposed custodians, at least 32 either had limited if any substantive involvement with the Monitor, and/or would have only duplicative documents that would be produced from others’ files. For example, Jean Claude Farah is based in Dubai and manages Western Union’s operations in the Middle East and Africa. He has no responsibilities for matters in North America, let alone matters related to the southwest border Monitorship. He has never done any work on the southwest border program, communicated with the Monitor, or played any decision-making role on issues related to the Monitorship.

Western Union has completed its interviews of the additional 42 custodians. The company is prepared to discuss its findings if the parties agree to resume negotiations to resolve the search protocol. In addition, for reasons we are prepared to discuss, Western Union will agree to include an additional 10 custodians from the FTC’s list if it is part of a global resolution of the search protocol issues.

B. Over-Inclusive Search Terms

The other significant issue still to be resolved is the FTC’s proposed inclusion in the search protocol of the “Group B” search terms; *i.e.*, Nos. 24-47 from your list of “revised additions” to the search term list (October 8, 2013 letter from Burke Kappler at Att 5-6). As we have discussed, these terms simply are not designed to capture documents referring or relating to *communications* with the Monitor, and would needlessly increase Western Union’s compliance costs and burdens. Western Union previously detailed these concerns in its August 27, 2013 letter. When we met on September 10, 2013, we agreed to analyze those search terms to assess

⁵ The FTC claimed before the District Court that its inquiry into the southwest border Monitorship is relevant to investigating consumer fraud because it will indicate whether Western Union takes its compliance obligations seriously. Now, the FTC appears to take the position that its overbroad proposal for custodians is justified because Western Union took its compliance obligations too seriously – *i.e.*, Western Union is accused of allocating too many employees and resources to work with the Monitor, thus bringing the burden upon itself.

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the extent to which they capture documents responsive to Specification 2 that would not be captured by limiting terms 1-23 (hereinafter the “Group A terms”). We have conducted that analysis with the assistance of UnitedLex and, notwithstanding the Commission’s termination of negotiations, we report our conclusions below.

UnitedLex ran a Group A search (base terms + proposed FTC limiting terms 1-23 listed on page Att-5 of Burke’s August 8 letter) on the emails received for nine test custodians, which yielded 99,852 documents.⁶ The Group B search (base terms + proposed FTC limiting terms 24-47) for that same collection yielded 145,564 documents. Of these totals, 89,663 documents overlapped between the two searches, meaning that using either the Group A or the Group B terms would have resulted in those documents being identified. This left 55,901 documents that resulted from the Group B search which were not picked up by the Group A search.

UnitedLex then extracted a random sample of 500 emails from the 55,901 Group B-specific documents. When their “family member” documents were added to the 500-email sample, the number of files increased to 4,213. We reviewed those 4,213 documents and determined that only 130 documents are potentially responsive to Specification 2. Thus, of the random sample of Group B-specific documents, *only 3.08% are even arguably responsive to Specification 2*. Even allowing for judgment calls as to whether a particular document is responsive – and we instructed our reviewers to construe the specification broadly – we are confident that no more than 5% of the sample set is responsive.

We also note the following regarding the 130 documents:

- 23 documents are calendar invitations or relate solely to meeting scheduling;
- Five documents are captured by other searches (*e.g.*, emails of which Lonnie Keene is a recipient); and
- 11 documents contain only a vague, non-specific, and/or non-substantive reference to the Monitor (*e.g.*, “Hey, the next time Lonnie is in town Hikmet would like to have lunch with him in the cafeteria.”).

Setting these documents aside, the Group B limiting search terms produced only 91 documents (2.1% of the sample number of files) that are responsive to Specification 2 and that are at least marginally substantive. Moreover, even as to these 91 documents, we cannot imagine how any one of them can shed light on the degree to which Western Union takes seriously its

⁶ The nine custodians for whom the email data were fully available are Nicole Ayres, Hollis Baugh, Noel Brandt, Joe Cachey, Phillip Carratala, Robert Enzaldo, David Holcomb, Phil Hopkins, and Richard Krollman.

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southwest border compliance obligations, let alone be even remotely relevant to the FTC's investigation.

This analysis confirms that the Group B limiting search terms constitute a highly inefficient means of identifying documents responsive to CID Specification 2 and that the marginal benefit, if any, of including them is substantially outweighed by the significant cost of doing so. Nevertheless, if, as part of resumed negotiations, the Commission would like any additional information about this analysis, Western Union would be prepared to consider that request.

IV. The Commission's November 18 Deadline

An additional challenge to the burdens created by the FTC's protocol is presented by Western Union's ongoing technical limitations in extracting and processing the underlying data and searches necessary for the production. From the outset of Western Union's negotiations with the FTC, Western Union, with the assistance of its electronic discovery vendor, made clear that the company's email journaling system was undergoing an upgrade and had a limited capacity for exporting email, hampering Western Union's ability to process and review such electronic files. Western Union described how the complex searches required by the FTC's proposed protocol were causing the system to crash, making results unreliable. In addition, Western Union advised the FTC that it could not begin the document review process until the custodian and search terms were finalized. The FTC never objected.

In its most recent letter, the FTC asserts that Western Union "disclosed *for the first time*" that it was upgrading its email system at the September 10 meet and confer. Oct. 18, 2013 letter at 3, emphasis in original. This is simply incorrect. On July 22, 2013, Western Union reported to the FTC that "because of maintenance, Western Union's email journaling system was not available for searching during a large portion of the five-day response period." At the July 30, 2013 meet and confer, an attorney for Western Union told the FTC about the email migration and that it was causing difficulties for the extraction of data from custodians. Then, in an August 7, 2013 letter, Western Union advised the FTC that its "email journaling system's search and export capabilities are limited" because "EMC, the vendor that manufactured the email journaling system, has been upgrading it over the past several months." Western Union also informed the FTC that the data extraction rate from its email journaling system, even without any errors or technical problems, indicated the data extraction process for the proposed custodians would take months. Aug. 7, 2013 letter at 2.

Despite the company's best efforts, lingering problems with the planned email migration remain. Western Union is committed to moving forward and is prepared to begin a rolling production immediately upon the finalization of the search protocol terms, but cannot complete

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its uploading, processing, and review of nearly 1.9 million documents by the FTC's proposed November 18, 2013 deadline.⁷

V. Western Union Cannot Rely on the FTC to Conduct a Privilege Review of Documents Produced to the FTC

As demonstrated above, Western Union has been negotiating the technical difficulties and undue burden issues with the FTC in good faith and is surprised and disappointed by the FTC's decision to abruptly halt the parties' negotiations and issue an ultimatum to produce an estimated 1.9 million documents, at a cost exceeding \$3.7 million, within the next three weeks. Further, "Option 2" set forth in the FTC's October 18 letter is illusory, since Western Union cannot provide the FTC with privileged documents without waiving its privileges.

On September 4, 2013, the FTC sent a letter challenging Western Union's assertion of privilege concerning 75 documents withheld from its production of direct communications with the Monitor, on the basis that the documents ceased to be privileged because they were shared with the Monitor and/or the Arizona Assistant Attorney General. Western Union responded, indicating that privilege was not waived because the documents were produced to a court-appointed officer pursuant to a court order, and under agreement that such parties would maintain the documents as privileged and confidential. Sept. 24, 2013 letter at 4. Such mandatory and protected production does not waive privilege. *See, e.g., Cobell v. Norton*, 213 F.R.D. 69, 75-76 (D.D.C. 2003) (production of documents to court-appointed monitor is "analogous to the receipt of documents by this Court," and therefore did not waive privilege).

Significantly, Western Union also referred the FTC to controlling case law for the proposition that privilege *can* be waived as to a document produced voluntarily to a government agency adversary, without explicit agreement to maintain its privilege. *In re Steinhardt Partners*, 9 F. 3d 230,236 (2d Cir. 1993) (voluntary production to SEC waived privilege, but court stated privilege would not be waived if document were produced subject to an "explicit agreement that the SEC will maintain the confidentiality of the disclosed materials").

The FTC now presents as "Option 2" that Western Union turn over all documents for a privilege review by FTC attorneys. Given the case law already presented to the FTC on the issue of privilege waiver, the FTC's Option 2 is not feasible. As the FTC is fully aware, Western Union cannot voluntarily turn over knowingly privileged documents to the FTC without subjecting itself to a waiver argument with respect to future requests for such documents from other agencies or third parties. The separate staff review and clawback provisions proposed by the FTC would protect Western Union only with respect to the current CID enforcement with the

⁷ Data from the 32 undisputed custodians is currently loaded and ready for processing in UnitedLex's system.

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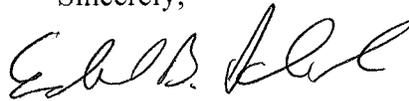
FTC and would provide no meaningful protection as to any third parties. Therefore, Option 2 fails to present a viable alternative.

VI. Conclusion

The Commission's October 18 letter represents a significant step backwards in the parties' efforts to resolve their differences so that Western Union could complete its production. However if, contrary to the position taken in your letter, the Commission is prepared to resume negotiations in order to achieve a global settlement of the outstanding issues, Western Union would be prepared to move forward based on an agreement that it will add the ten additional employees discussed above to the custodian list. Given that, as demonstrated above, the Commission's "Group B" search terms proposal was simply misguided and should be dropped, the parties should be able to reach agreement on this basis. We urge you to do so.

Please let us know your position by the close of business, October 31, 2013.

Sincerely,



Edward B. Schwartz

CONTEMPT EXHIBIT 11

Declaration of Hugh Huettner

November 7, 2013

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL TRADE COMMISSION,)
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)
 Petitioner,)
)
)
 v.)
)
 THE WESTERN UNION COMPANY,)
)
)
 and)
)
)
 LONNIE KEENE, MONITOR, STATE OF)
 ARIZONA v. WESTERN UNION)
 FINANCIAL SERVICES, INC., KEENE)
 CONSULTING ARIZONA, LLC,)
)
)
 Respondents.)
)
)

DECLARATION OF HUGH HUETTNER

Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. I am a United States citizen over the age of eighteen years old.
2. I am a Technical Computer Forensic Examiner for the Federal Trade Commission (“FTC”) in Washington, D.C. My duties include managing the collection, preservation, examination, and analysis of evidentiary electronically stored information (“ESI”), which the FTC collects through voluntary submissions, discovery, and legal proceedings.
3. Prior to working for the FTC, I was employed as a Computer Forensic Analyst by the Department of Commerce (“DOC”), Office of Export Enforcement (“OEE”), in Washington, D.C. As a Computer Forensic Analyst, my duties included providing support, advice, and investigative guidance to DOC OEE criminal investigators and managers. Additionally, my duties included preserving, collecting, and analyzing digital evidence.

4. I have a Bachelor of Arts degree in Business Administration from the University of Maryland University College and an Associate's degree in Criminal Justice from Lassen Community College.

5. I am a graduate of the Apprentice Special Agent's Course sponsored by the United States Army Criminal Investigation Command, and the Criminal Investigator Training Program sponsored by the United States Department of Homeland Security, Federal Law Enforcement Training Center.

6. I am a graduate of the Department of Homeland Security's Seized Computer Evidence Recovery Specialist and Computer Network Investigations Training Program.

7. I have completed formal classroom training in the use of forensic software programs from Guidance Software ("Encase") and the Access Data Corporation Forensic Toolkit ("FTK"). Encase and FTK are two computer forensic software packages that are generally accepted by the scientific community for use in acquiring, processing, and analyzing ESI. I have met the requirements for the EnCase Certified Examiner ("EnCE") and the Access Data Certified Examiner ("ACE") programs, and was awarded and currently maintain both certifications.

8. I have earned the both the CompTIA A+ and Comp TIA Network+ Information Technology certifications.

9. As a forensic examiner for the FTC, my job duties include providing computer forensic support to FTC attorneys and investigators. In the course of my duties, I was assigned to work on the case of *FTC v. The Western Union Company*, 1:13-mc-0131-AKH.

10. As part of my duties in this case, on September 10, 2013, I attended a meeting between counsel for Western Union and the FTC. Present for Western Union were Edward B. Schwartz, Esq. and Jose Gonzales-Magaz, Esq. Also attending for Western Union was John

Connell, a representative of UnitedLex, Western Union's document production vendor. In addition to myself, attending for the FTC were Assistant General Counsel, Leslie Rice Melman, Burke Kappler and Josephine Liu, attorneys in the FTC's Office of General Counsel, and my supervisor, Edwin Acajabon, Assistant Director of the FTC's Division of Planning and Information.

11. At this meeting, Mr. Connell discussed Western Union's e-mail migration project. Mr. Connell did not mention when this project started, but he explained that Western Union was converting its e-mail from Lotus Notes to Microsoft Outlook. At the same time, Western Union was converting its e-mail archive, which resided in a separate server, from an older product provided by EMC (a computer software and hardware vendor) to a new product.

12. Typically, large companies will utilize outside document production vendors to assist in responding to CIDs. The Western Union representatives informed us that prior to this e-mail conversion project, Western Union had attempted to search for e-mails by assigning only one paralegal employee to run searches in Western Union's older e-mail archive database.

13. During the course of the meeting, Western Union's counsel, Mr. Gonzales-Magaz, stated that Western Union had considered informing the FTC about Western Union's data migration project at an earlier point in time, but ultimately decided not to do so. If Western Union had disclosed that project to the FTC, FTC Litigation Support personnel could have suggested alternatives or work-arounds that would have enabled Western Union to run the search terms in a more timely fashion and without Western Union incurring many of the extra costs that UnitedLex stated were being imposed by technical difficulties associated with Western Union's data migration. There are a number of work-arounds that could have been considered, but one

possible option was to organize the conversion process to segregate out the document custodians identified by the FTC and to search these custodians prior to any conversion.

14. Mr. Connell also discussed how this data migration project affected Western Union's ability to search and retrieve electronic documents. Mr. Connell stated that because of the ongoing migration, the company was required to develop its own work-around solutions that required additional time and cost.

15. In my opinion, the technical terms for Western Union's e-mail project are "migration" or "conversion." It is not accurate to refer to this project as "maintenance." "Maintenance" typically refers to work to improve an existing system, while nonetheless keeping that same system. Similarly, the term "upgrade" typically refers to installing a newer version of an existing system. Thus, many users "upgrade" from Microsoft Windows Vista to Windows 7.0, or from Apple iOS 6.0 to iOS 7.0. Neither "maintenance" nor "upgrade" fully describe the e-mail conversion project discussed at the September 10 meeting. This means that up to this point in time (*i.e.*, September 10, 2013) Western Union had not informed the FTC that it was undertaking a technology project that would hinder its data gathering and production efforts in response to the Court's Order.

16. I understand that, following the meeting of September 10, FTC counsel proposed to Western Union that the FTC absorb much of the cost of complying with the CID by using FTC-owned facilities and applications to perform the document review. The FTC offered to use a privilege screen and "taint team" procedure to screen the documents for privilege and then search and review the documents for responsive materials using its own e-discovery tools. This is an arrangement that the FTC has used previously, typically in cases where the agency is seeking an injunction under Section 13(b) of the FTC Act, 15 U.S.C. § 53(b). My duties include

providing technical support in such cases. I have assisted FTC staff in obtaining and reviewing information using similar procedures in several such matters.

17. I have been assigned to several cases in which the FTC has employed a privilege screen and “taint team” procedure to protect the privileges of the producing party. In such a procedure, we electronically search for the names of the party’s attorneys and law firms. Once we have identified the documents containing communications with the attorneys and law firms, we provide a basic list of the documents to the party and we sequester the documents. Any direct review of apparently privileged material is performed by a “taint team” of FTC attorneys and/or paralegals separate from the investigating staff. We have also employed clawback agreements to further protect the party’s privileged documents.

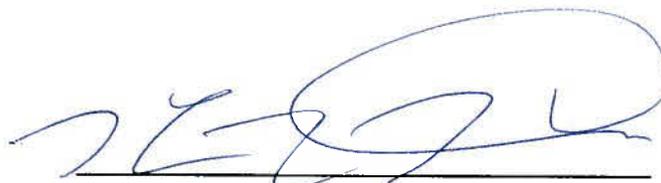
18. I understand that Western Union has estimated that the total amount of information for the 74 custodians is 1,814 gigabytes (GB), or 1.814 terabytes (TB). In the cases I have worked on, we routinely received and processed for review amounts of information in excess of that estimate, typically between 2 and 4 TB of information in documents prepared using generally-available software applications.

19. I understand that Western Union has stated that employing the FTC’s search terms would require 1,692 separate searches. Such searches can be combined and run automatically and simultaneously using typical document review software systems. I have combined and run multiple searches using the FTC’s document review software. The FTC’s software is consistent with standard, commercially-available document review software. Western Union should have access to software of similar, if not greater, sophistication, through its vendor United Lex.

20. I understand that Western Union has estimated that the total cost of review and production of the FTC's search protocol amounts to \$3.7 million. I have not seen a breakdown of how that estimate is derived, but at the September 10 meeting, Western Union's counsel, Mr. Schwartz, stated that human review constituted the most substantial part of this cost estimate. The FTC's proposal to use its own facilities to run the search terms and to convene a "taint team" to conduct a privilege review should significantly reduce Western Union's cost estimate.

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

Executed on November 7, 2013.



Hugh Huettner

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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)	
FEDERAL TRADE COMMISSION,)	
)	
	Petitioner,)	
)	
	v.)	Misc. No. 1:13-mc-00131-AKH
)	
THE WESTERN UNION COMPANY,)	(Nature of Case M 18-304:
)	Administrative Subpoena Proceedings)
and)	
)	
LONNIE KEENE, MONITOR,)	
)	
	Respondents.)	
<hr/>)	

**MEMORANDUM OF LAW IN SUPPORT OF APPLICATION OF THE FEDERAL
TRADE COMMISSION FOR ORDER TO SHOW CAUSE WHY THE WESTERN
UNION COMPANY SHOULD NOT BE HELD IN CIVIL CONTEMPT**

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ARGUMENT 10

I. The FTC has satisfied all of the elements of civil contempt. 10

 A. The June 7 order was clear and unambiguous. 10

 B. The proof of Western Union’s noncompliance is clear and convincing. 11

 C. Western Union has not been reasonably diligent or energetic in attempting to comply with the June 7 order. 12

II. The Court should impose coercive relief, including daily monetary sanctions. 17

CONCLUSION 20

INTRODUCTION

The FTC and Western Union last appeared before this Court on May 28, 2013. On that date, and by order dated June 7, 2013, this Court directed Western Union to comply with the FTC's Civil Investigative Demand ("CID"). Among other directives, the Court ordered Western Union to produce documents responsive to Specification 2 of the CID – *i.e.*, all documents “referring or relating to communications with the Monitor” – in accordance with a search protocol to be finalized by the FTC after consultation with Western Union. The June 7 order was quite clear: “Western Union *shall accept* the FTC's” final choice of search protocol and shall “within 15 days ... produce all of the documents identified as a result of its execution of the protocol,” subject only to the FTC's discretion to grant extensions. Dkt. 47 ¶ 14 (emphasis added). On June 21, 2013, this Court denied Western Union's Motion for Clarification and/or Reconsideration.

More than five months have passed since the June 7 order directing Western Union to “accept” the FTC's choice of search protocol and “produce all of the documents” so identified. Western Union has flatly defied that order:

- It has produced *no documents* pursuant to the Court-ordered protocol;
- It has rejected the FTC's final search protocol on the grounds that the numbers of custodians and search terms are burdensome, even though the June 7 order compelled Western Union to accept that protocol, and even though the FTC had developed the protocol after two consultations with the Monitor, had voluntarily reduced the number of custodians, and had revised the search terms at Western Union's request;
- Western Union even rejected the FTC's offer to absorb most of Western Union's costs by using the FTC's own litigation support staff to run the search protocol and an

independent “taint team” to identify and segregate any privileged documents; and

- Western Union continues to stonewall by advancing new arguments for noncompliance well after the deadlines for such arguments have passed. Some of these arguments contradict positions that Western Union itself previously advanced before the Commission and this Court.

In short, Western Union has flouted this Court’s CID enforcement order and has thereby impeded the FTC’s investigation. The Court should now order Western Union to show cause why it should not be held in civil contempt of the June 7 order. The Court should thereafter find Western Union in civil contempt and impose daily monetary sanctions until it complies with the June 7 order. In the alternative, the Court should order Western Union to do by December 20, 2013, what it should have done months ago: “accept” the search protocol reflected in the FTC’s letter of August 8, 2013 and “produce all of the documents identified as a result of its execution of the protocol.” Dkt. 47 ¶ 14. .

FACTUAL BACKGROUND

1. The FTC’s investigation.

The FTC is investigating the adequacy of Western Union’s policies and procedures to detect and deter fraud-induced money transfers, the practice by which consumers are deceived into wiring money to third parties using a variety of pretenses. Dkt. 1 ¶¶ 6-11. The FTC instituted this enforcement proceeding when Western Union refused to comply with a CID, even after months of negotiation and the Commission’s denial of Western Union’s Petition to Quash.

2. The Court’s order enforcing the CID (June 7, 2013).

On June 7, 2013, this Court issued an order enforcing the CID in full, save for a provision that required Western Union to produce consumer complaints and related documents pertaining

to money transfers transmitted by senders in foreign countries to recipients in foreign countries. Dkt. 47; *see also* Dkt. 41 at 20-21. Among other requirements, the June 7 order created a four-step process by which the parties would develop a protocol for Western Union to use to locate electronically stored documents “referring or relating to communications with the Monitor.” Dkt. 47 ¶¶ 13-14. In particular:

- “Western Union shall, within 14 days of the entry of this Order, produce a proposed protocol” for the relevant document search;
- “The FTC shall respond in a timely fashion to Western Union’s proposed protocol and may provide additional or alternative search terms or additional or alternative steps for searching for, identifying, and producing documents”;
- “Within 5 days, Western Union shall advise the FTC whether any of the additional or alternative search terms or steps are either overinclusive or underinclusive, with a statement of the specific reasons for its position and supporting data”; and
- “[T]he FTC shall promptly respond to Western Union’s information,” and “Western Union *shall accept* the FTC’s response and, within 15 days of the FTC’s response, or at such later time as may be agreed by the FTC, *produce all of the documents identified as a result of its execution of the protocol and the FTC’s response.*”

Dkt. 47 ¶¶ 13-14 (emphasis added). There is no ambiguity here: the FTC’s “response” in the fourth step was binding on Western Union and triggered a duty to produce “all of the documents” promptly.

3. Search protocol discussions (June 20 – August 8, 2013).

On June 20, 2013, Western Union presented the FTC with an initial search-protocol proposal, which contradicted Western Union’s own prior advocacy before this Court.

Previously, in opposing the Specification 2’s request for “[a]ll documents referring or relating to communications with the Monitor,” Western Union had represented to this Court that “no fewer than 57” custodians would have to be searched for responsive documents if that request is enforced according to its terms. Dkt. 41 at 24. Once Western Union lost that argument and was ordered to comply with Specification 2 as written, it suddenly took the contradictory position that its discovery obligations were in fact quite narrow. Its proposal to the FTC thus included only 10 custodians and a total of 17 search terms – 7 “base” terms to be combined with 10 “limiting” terms.¹ Dkt. 41 at 24; Contempt Exh. 1 ¶ 7; Contempt Exh. 2.

The FTC viewed this proposal as unduly narrow, particularly given the company’s own prior representation that faithful enforcement of Specification 2 by its terms would require searches for “no fewer than 57” custodians. The FTC thus undertook a detailed review of the Monitor’s reports and consulted with the Monitor. It sought in particular to identify those search terms and custodians most likely to lead to responsive documents and to enable both Western Union and the FTC to avoid the costs of reviewing unresponsive documents. Contempt Exh. 1 ¶¶ 8-9. In light of this review, the FTC proposed 135 custodians (in lieu of Western Union’s 10) and proposed 57 specific search terms (in lieu of Western Union’s 17). Contempt Exh. 3. This proposal was tailored to capture those document custodians whom the Monitor himself has identified for their involvement in his project. Contempt Exh. 1 ¶¶ 8-9.

At this point, the June 7 order required Western Union to “advise the FTC whether any of

¹ The “base” and “limiting” terms are to be applied in combination. Western Union would only be required to review and produce documents “hit” by a combination of a “base” and a “limiting” term. A hit by only a “base” term or only a “limiting” term would not be sufficient to require review.

the additional or alternative search terms or steps are either overinclusive or underinclusive” and to include “a statement of the specific reasons for its position and supporting data.” Dkt. 47 ¶ 14. Western Union ignored that directive. Instead, it merely objected to the *numbers* of custodians and search terms but did not provide a specific cost justification for its objections or provide data to support its view that the Commission’s proposal was improper. Contempt Exh. 1 ¶¶ 11-12; Contempt Exh. 4.

The FTC agreed nonetheless to undertake yet another detailed review of its proposed custodians and search terms. FTC staff re-reviewed the Monitor’s report and consulted with the Monitor a second time regarding those Western Union employees with whom he had communicated. After this additional due diligence, which went beyond the Commission’s obligations under the order, the FTC – anxious to move the investigation forward – agreed to shorten the custodian list from 135 to 74 (a reduction of 45%) and to further revise the search terms. Contempt Exh. 1 ¶¶ 13-14; Contempt Exh. 6.

By letter dated August 8, the FTC presented its revised protocol to Western Union, thus triggering provisions of the June 7 order that required Western Union not only to “accept” that protocol, but to run it and produce responsive documents on a tight timeframe. Contempt Exh. 6. Specifically, the Commission advised Western Union that, to comply with the order, it needed to make an initial production and provide a schedule for production within 15 days (*i.e.*, August 23, 2013), *see* Dkt. 47 ¶ 14, and to complete the entire production by October 31, 2013, a date based on Western Union’s own projections that it could retrieve and process e-mail for 32 custodians in 30 days, a rate of roughly one custodian per day. Accordingly, the FTC set the deadline 74 days from August 8 – or October 21 – and then allowed 10 additional days, bringing the deadline to October 31, 2013. Contempt Exh. 6.

4. Post-deadline negotiations (August 27, 2013 – October 18, 2013).

Western Union did not run the search protocol or meet the deadlines specified by the FTC. Instead, on August 27, 2013, the company provided a letter and a report from its vendor, UnitedLex, in which it raised for the first time the issue of compliance costs.² Contempt Exh. 7. In its letter, the company extrapolated from a set of only three custodians to estimate that the costs required to execute the protocol would exceed \$3.7 million. *Id.* The company also cited the UnitedLex report, which collected hit rates for various search term combinations proposed by the FTC in documents collected from the three test custodians. *Id.* Based on this, the company requested further reductions in the search protocol and asked for another meet-and-confer. *Id.*

Counsel for the FTC and Western Union met on September 10, 2013. At that meeting, Western Union raised an entirely new set of issues for the Commission to address (Contempt Exh. 9):

a. Western Union provided new information regarding its e-mail system.

The company disclosed for the first time that it was in the midst of converting its e-mail system from Lotus Notes to Microsoft Exchange and converting its e-mail archives from an older system to a newer system, a project that it claimed would impose additional costs and delay in production of materials from the identified custodians. *Id.*; *see also* Contempt Exh. 11 ¶¶ 10-15.

² Although it was required to do so to exhaust its administrative remedies, *see* 16 C.F.R. §§ 2.7(k), 2.10(a)-(b), Western Union did not object to the burden of compliance in its petition to the Commission to quash the CID. At the show cause hearing before this Court, Western Union raised the issue of burden but provided no specific estimates as to what that burden might be; instead, the company only asked the FTC to consider search terms as a way of mitigating this presumed burden. Dkt. 41 at 24-26.

b. Western Union made new requests for changes to the search protocol without substantial support.

Western Union also demanded further changes in the search protocol – namely, to set aside entirely the 24 search terms that referenced specific topics and issues in its communications with the Monitor. It further stated that it would not begin conducting searches and reviewing results until agreement was reached. The company also indicated that it wanted reductions to the numbers of custodians beyond the 45% reduction the Commission already made. Western Union did not provide any supporting data to explain why such cuts were necessary. To the contrary, the report provided by Western Union with its August 27 letter reflected a substantial number of hits using the very search terms that Western Union now wanted the FTC to set aside. *See* Contempt Exhs. 7, 9.

c. Western Union abandoned its earlier position regarding the scope of Specification 2.

As noted, Western Union had previously objected that enforcement of the CID’s demand for “[a]ll documents referring or relating to communications with the Monitor” would subject Western Union to onerous production obligations. Dkt. 41 at 24-25. In particular, the company had argued that the CID’s definition of “referring or relating to” – namely, “discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part” – was so broad that it would require document searches for “no fewer than 57” custodians. Dkt. 41 at 24; *see also* Pet. Exh. 4 (Dkt. 1 at 28-29); Dkt. 21 at 22-23. This Court nonetheless enforced this portion of the CID as written. *See* Dkt. 41 at 21.

In the teeth of Western Union’s prior representation, the company now announced to the FTC that it intended to reduce its obligations under the CID by limiting its production to

documents that referred to *specific or direct* communication with the Monitor or a member of his team. As stated in its August 27, 2013, letter, “It bears remembering that Specification 2 of the CID seeks ‘[a]ll documents referring or relating to *communications with the Monitor* . . .’ Specification 2 does not seek all documents ‘referring or relating to *the Monitor*.’” Contempt Exh. 7 (emphasis in original). That position makes no sense as a matter of logic: the FTC seeks only documents *relating to communications* with the Monitor (rather than hypothetical documents about the Monitor unrelated to those communications, such as where he lives or who his parents are). But the CID makes clear that it seeks all documents “referring or relating to” such communications, and it broadly defines “referring or relating to” in terms that flatly preclude Western Union’s interpretation. In short, Western Union’s position contradicts both the plain meaning of the CID and its own prior representation to this Court about the production obligations that would be imposed by a plain-meaning interpretation of Specification 2.

After the meet-and-confer, Western Union advised the Commission that as of September 12, 2013, it had completed collecting and processing e-mail for only 9 of the 74 identified custodians, Contempt Exh. 8, even though the Commission had served Western Union with process more than 9 months earlier and had obtained court enforcement in June of this year.

5. The FTC’s proposal to alleviate Western Union’s burden (October 18, 2013).

On October 18, 2013, in the interests of moving the investigation forward and avoiding further litigation, the Commission offered Western Union two options.³ Contempt Exh. 9. Under the first, Western Union could execute the final search protocol, as proposed by the

³ The Commission would have responded earlier but was closed due to the government shutdown from October 1 to 16, 2013.

Commission in its letter of August 8, 2013. Contempt Exhs. 6, 9. The second option addressed all of Western Union's complaints about the cost and burden of production. Specifically, the Commission proposed that Western Union produce the complete document collections for the 74 custodians identified by the FTC. Contempt Exh. 9. The FTC would then absorb virtually all the costs of production by running the search protocol to identify responsive documents. *Id.* To protect Western Union's privilege, the FTC further proposed to conduct an electronic privilege screen and to have any apparently-privileged documents screened out by an independent "taint team" prior to substantive review by investigating staff. *Id.* The FTC also proposed seeking entry of a clawback order that would protect Western Union from claims of waiver under Federal Rule of Evidence 502(d), even as to third parties. *Id.*; *see also* Fed. R. Evid. 502(d). In short, this second option was designed to allow Western Union to avoid the cost and burden of human review – the only reason that Western Union had advanced for refusing to accept the Commission's search protocol. Contempt Exh. 9; Contempt Exh. 11 ¶¶ 16-20. The Commission asked Western Union to respond to this proposal no later than October 25, 2013.

6. Western Union's rejection of the Commission's proposal (October 29, 2013).

Western Union did not respond until October 29, 2013, when it rejected both of the FTC's proposed options and said it would not meet the Commission's extended deadline of November 18, 2013. Contempt Exh. 10. Instead, having failed to produce even a single "relating to" document pursuant to the Court-ordered protocol, it merely invited the FTC to engage in further negotiations on the numbers of custodians and search terms and announced that it would not proceed until these were finalized. *Id.*

ARGUMENT

I. The FTC has satisfied all of the elements of civil contempt.

It is long-established that district courts have the inherent power to enforce compliance with their lawful orders through civil contempt. *See Shillitani v. United States*, 384 U.S. 364, 370 (1966); *see also Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991) (“Courts of justice are universally acknowledged to be vested, by their very creation, with power to impose silence, respect, and decorum, in their presence, and submission to their lawful mandates.”); *Abrams v. Terry*, 45 F.3d 17, 23 (2d Cir. 1995); *D’Orange v. Feely*, 959 F. Supp. 631, 634–35, 637 (S.D.N.Y. 1997). This power is “governed not by rule or statute but by the control necessarily vested in courts to manage their own affairs so as to achieve the orderly and expeditious disposition of cases.” *Chambers*, 501 U.S. at 43 (internal quotation marks omitted).

Through this inherent power, the Court may hold a party in civil contempt if the moving party shows that “[i] the order being enforced is clear and unambiguous, [ii] the proof of noncompliance is clear and convincing, and [iii] the defendants have not been reasonably diligent and energetic in attempting to accomplish what was ordered.” *EEOC v. Local 638*, 753 F.2d 1172, 1178 (2d Cir. 1985) (internal quotation marks omitted). The Court need not find that the noncompliant party’s disobedience was willful. *Id.*; *SEC v. Universal Express, Inc.*, 546 F. Supp. 2d 132, 134 (S.D.N.Y. 2008). Each of the required factors is present here, and Western Union should thus be held in contempt.

A. The June 7 order was clear and unambiguous.

The June 7 order gave the parties clear directions for formulating a search protocol. Western Union would first make an initial proposal, to which the FTC could respond. Dkt. 47 ¶¶ 13-14. Western Union could then advise the FTC if its response was overinclusive or

underinclusive and, following this, the FTC would respond again and provide Western Union with a final search protocol. *Id.* ¶ 14. Indeed, at no point has Western Union disputed the meaning of paragraphs 13 and 14, and its noncompliance does not result from any dispute over the meaning of the governing provisions.⁴ *See NBA v. Design Mgmt. Consultants, Inc.*, 289 F. Supp. 2d 373, 377 (S.D.N.Y. 2003) (“An order is clear and unambiguous where it is specific and definite enough to apprise those within its scope of the conduct that is being proscribed or required.”) (internal quotation marks omitted).

B. The proof of Western Union’s noncompliance is clear and convincing.

In the context of civil contempt, “the clear and convincing standard requires a quantum of proof adequate to demonstrate a reasonable certainty that a violation occurred.” *Levin v. Tiber Holding Corp.*, 277 F.3d 243, 250 (2d Cir. 2002) (internal quotation marks omitted). As summarized above and related in detail in the accompanying declarations, undisputed facts establish beyond a reasonable certainty that Western Union has defied the requirements of the CID enforcement order. Specifically:

- Western Union has not produced even one of the documents “referring or relating to communications with the Monitor” resulting from the search protocol, even though these may be the most probative documents in the current investigation. Contempt Exh. 1 ¶ 20.

⁴ Western Union filed a Motion for Clarification and/or Reconsideration on June 17, 2013. Dkts. 44-45. That motion requested clarification as to which of several alternative proposals for order provisions this Court intended to select. The Court denied the motion, finding that Western Union merely sought to relitigate issues the Court had already addressed.

- Western Union failed to meet the 15-day deadline to provide the initial production and schedule as required by the FTC. *See* Dkt. 47 ¶ 14.
- Western Union has stated that it will not review or produce documents required by the order without further negotiations and a new agreement on a more limited number of custodians and different search terms. Dkt. 47 ¶ 14; Contempt Exhs. 9, 10.
- Western Union has not met the October 31 deadline and has announced that it would not meet an extended November 18 deadline either. Dkt. 47 ¶ 14; Contempt Exh. 10. Indeed, Western Union has refused to specify any deadline for production.
- Abandoning its prior construction of the CID, Western Union has announced that, wholly apart from its objections to the search protocol, it will not produce “documents referring or relating to” all communications with the Monitor, as required by Specification 2. Instead, it will select for production only those documents that refer to specific or direct communications with the Monitor, even though nothing in the CID or this Court’s June 7 order permits limiting Specification 2 that way, and even though the time for making such interpretive arguments has long since passed. Dkt. 47 ¶¶ 13-14; Contempt Exhs. 1 ¶ 16.c., 7, 9, 10.

C. Western Union has not been “reasonably diligent” or “energetic” in attempting to comply with the June 7 order.

If it means anything at all, “reasonable diligence” requires a party to develop reasonably effective methods of complying with a court order. *See, e.g., King v. Allied Vision, Ltd.*, 65 F.3d 1051, 1058-59 (2d Cir. 1995); *Cancer Research Inst., Inc. v. Cancer Research Soc’y, Inc.*, 744 F. Supp. 526, 530 (S.D.N.Y. 1990); *Musalli Factory for Gold & Jewelry Co. v. N.Y. Fin. LLC*, No. 06 Civ. 82(AKH), 2010 WL 2382415, at *3 (S.D.N.Y. June 14, 2010); *Fendi Adele S.R.L. v. Burlington Coat Factory Warehouse Corp.*, No. 06 Civ. 0085(LBS), 2007 WL 2982295, at *5

(S.D.N.Y. Oct. 10, 2007). Reasonably energetic compliance, at a minimum, requires a party “to energetically police” the effectiveness of its compliance measures and, when advised that such measures have fallen short, to modify them accordingly. *Manhattan Indus., Inc. v. Sweater Bee by Banff, Ltd.*, 885 F.2d 1, 4-5 (2d Cir. 1989) (internal quotation marks and citation omitted).

Western Union has not been “reasonably diligent,” let alone “energetic.” This Court’s order required Western Union to accept the FTC’s final protocol and start producing documents. Yet in the more than three months since the search protocol was finalized, *Western Union has not produced a single document in response*. Indeed, the FTC has not received even a limited production of such documents from any of Western Union’s preferred slate of custodians, using its own search terms and applying its own, cramped interpretation of the breadth of Specification 2. Nor has Western Union produced even hard copy documents that would not impose the “burdens” of electronic search and review.

Although Western Union has produced limited information in response to the CID’s Specification 1, that is no excuse for the company’s defiance of its independent obligation to comply with the June 7 order as it relates to Specification 2. Many of the Specification 1 documents provided thus far have been essentially token productions of information that were easy to obtain and simple to produce. For instance, the Monitor’s own reports amounted to only 335 pages of documents, while consumer complaints were primarily produced in the form of spreadsheets. Contempt Exh. 1 ¶ 19.

As this Court has found, such partial productions do not excuse contempt. In *Cordius Trust v. Kummerfeld Associates, Inc.*, for example, this Court found that defendants were in contempt of a discovery order, even after the defendants made a partial production, and even though they subsequently completed production in the course of responding to the plaintiff’s

contempt motion. 658 F. Supp. 2d 512, 516-17 (S.D.N.Y. 2009) (“[W]hile production may now be complete, Kummerfeld cannot remedy his noncompliance with this Court’s order by belatedly producing documents, and only after the filing of a motion for contempt.”).

Similarly, in *National Basketball Ass’n v. Design Management Consultants, Inc.*, this Court found defendants in contempt for providing a partial response to an order that required them to produce an accounting of sales and profits and supporting documentation. 289 F. Supp. 2d at 376-78. Indeed, *National Basketball* is markedly similar to the present matter because, like Western Union, the defendants claimed their noncompliance was caused by technical difficulties – specifically, an “extremely rudimentary accounting system” that forced them to conduct a manual review of invoices. *Id.* at 375. As a result, they argued, compliance with the order would be both expensive and time-consuming. *Id.* at 375-78. This Court, however, summarily rejected those difficulties as an excuse for their failure to comply. *Id.* at 377-78.

Apart from its failure to produce even a single document responsive to Specification 2, Western Union’s shortcomings are shown most clearly by its course of conduct. As of August 7 – two months after the Court entered its order – Western Union had not yet begun to collect electronic documents from likely custodians. Contempt Exh. 5. And as of September 12 – a full nine months after receipt of the CID and three months after the Court enforced the CID – Western Union had processed e-mails for only 9 of the 74 custodians identified by the FTC. Contempt Exh. 8.

Further, Western Union withheld from the FTC critical information about its pending e-mail conversion project, which it now claims will increase its retrieval costs and delay production. Western Union disclosed this obstacle to its compliance only after the FTC issued the final search protocol and after the initial deadlines for the search protocol had run. *See*

Contempt Exh. 11 ¶ 13. Western Union’s silence about the state of this project defeats any notion that the company was reasonably diligent or energetic in obeying the Court’s order to provide the FTC documents. If Western Union had notified the FTC earlier of the problems posed by this conversion, the parties could have worked cooperatively to develop a solution. *Id.* For example, even if Western Union faced some exigency requiring it to undertake the conversion before production, Western Union and the FTC could have arranged for the company to convert e-mails from those custodians identified by the FTC first in order to avoid unnecessary delay in search and review. *Id.*

Indeed, counsel conceded in that meeting that the company had considered disclosing the project to the FTC earlier, but had elected not to do so. *Id.* Although Western Union, through counsel’s letters, alluded to certain difficulties, including that the system was undergoing “maintenance,” that the system’s “search and export capabilities are limited,” and that the system was being upgraded, these statements in no way alerted the FTC to the comprehensive e-mail project described by counsel on September 10. At that meeting, Western Union revealed that it was overhauling its e-mail and storage systems, and that this overhaul required the company to undertake duplicate searches for e-mail and prevented the production of documents until the conversion could be completed. See Contempt Exh. 11 ¶¶ 10-15.

In any event, even if Western Union had informed the FTC of difficulties with its e-mail system, that would not excuse its failure to use reasonable diligence and apply energetic efforts to comply with the Court’s order. *National Basketball Ass’n*, 289 F. Supp. 2d at 375. Nor can Western Union rely upon such difficulties in calculating its compliance costs – a party cannot create burdens or obstacles for itself and then claim these costs affect its production obligations. *See, e.g., Quinby v. WestLB AG*, 245 F.R.D. 94, 104 (S.D.N.Y. 2006) (“[I]f a party creates its

own burden or expense by converting into an inaccessible format data that it should have reasonably foreseen would be discoverable material at a time when it should have anticipated litigation, then it should not be entitled to shift the costs of restoring and searching the data.”) (citing, *inter alia*, *Zubulake v. UBS Warburg LLC*, 220 F.R.D. 212, 216 (S.D.N.Y. 2003)).

Similarly, the fact that Western Union has yet to offer sufficient data to support its assertions of burden undercuts any claim that it has been diligent in attempting to comply. The Court’s order required Western Union to support its position with “specific reasons” and “supporting data.” Dkt. 47 ¶ 14. To date, however, Western Union has offered only limited data, extrapolations, and questionable estimates, some of which it has based on a sample of documents from as few as three custodians.⁵ Furthermore, as its most recent letter indicates, Western Union is insisting that unless the FTC agrees to further negotiations, it will withhold information discussing some of the FTC’s 74 selected custodians and their relationship to the Monitor – information that at this point is already more than three months overdue. Contempt Exh. 10 at 8; Dkt. 47 ¶ 14. Such conduct is the antithesis of a “reasonably diligent or energetic” effort to comply.

In any event, even if Western Union’s cost projections were supported by hard data, the time for considering such objections passed long ago. Western Union advanced this claim of burden in opposing the Commission’s enforcement petition, and did not prevail. *See* Dkt. 21 at 24-25; Dkt. 41 at 24-26. In fact, the Court concluded that the CID was *not* “too onerous” and

⁵ Moreover, Western Union multiplies the number of base terms and the number of limiting terms to support its claim that the FTC is asking for 1,692 searches and that this is unduly burdensome. The company overlooks, however, that these searches can be combined and run electronically. *See* Contempt Exh. 11 ¶ 19.

directed the parties to exchange and refine search terms in precisely the manner captured in the June 7 order. Dkt. 41 at 25-26. Western Union may not relitigate the merits of the underlying order in defense of an application for civil contempt. “A ‘contempt proceeding does not open to reconsideration the legal or factual basis of the order alleged to have been disobeyed and thus become a retrial of the original controversy.’” *N.Y. State Nat’l Org. for Women v. Terry*, 697 F. Supp. 1324, 1334 (S.D.N.Y. 1988) (quoting *Local 28 of the Sheet Metal Workers’ Int’l Ass’n v. EEOC*, 478 U.S. 421, 441 n.21 (1986)); accord *United States v. Rylander*, 460 U.S. 752, 756–57 (1983).

Finally, this is not a case in which there is even a colorable basis for contending that compliance is impossible. See *Badgley v. Santacroce*, 800 F.2d 33, 36-37 (2d Cir. 1986) (quoting *United States v. Rylander*, 460 U.S. 752, 757 (1983)). “[C]ompliance must be beyond the realm of possibility, not just difficult to achieve, before a party will be exonerated in a contempt proceeding.” *Nat’l Basketball Ass’n*, 289 F. Supp. 2d at 377; see also *Huber v. Marine Midland Bank*, 51 F.3d 5, 10 (2d Cir. 1995). In raising such a defense, the party subject to the order bears the burden of production, which “may be difficult to meet, particularly in cases such as this where the defendants have a long history of delay and the plaintiffs’ needs are urgent.” *Badgley*, 800 F.2d at 36 (citations omitted). Western Union has never asserted, and indeed, cannot assert, that compliance with the June 7 order is impossible. Indeed, in responding to Specification 1, the company has shown that it can produce information when it chooses to – or when it is directly ordered to do so.

II. The Court should impose coercive relief, including daily monetary sanctions.

Judicial sanctions following an order of civil contempt may be imposed both to compel compliance with the court's order and to compensate injury suffered as a result of the violations.

In re Grand Jury Witness, 835 F.2d 437, 441 (2d Cir. 1987) (citing *Gompers v. Buck's Stove & Range Co.*, 221 U.S. 418, 448-49 (1911)); *S. New England Tel. Co. v. Global NAPs Inc.*, 624 F.3d 123, 146 (2d Cir. 2010). The Court has “broad discretion to fashion an appropriate coercive remedy ... based on the nature of the harm and the probable effect of alternative sanctions.” *EEOC v. Local 28 Sheet Metal Workers Int'l Ass'n*, 247 F.3d 333, 336 (2d Cir. 2001) (ellipsis in original); see also *Paramedics Electromedicina Comercial, Ltda. v. GE Med. Sys. Info. Techs., Inc.*, 369 F.3d 645, 657 (2d Cir. 2004). For the reasons stated below, this Court should impose sanctions in the form of daily monetary fines to bring Western Union into compliance with the Court’s order.

In calculating a coercive fine, a district court considers “several” factors “including ‘the character and magnitude of the harm threatened by continued contumacy,’ the ‘probable effectiveness of any suggested sanction in bringing about [compliance],’ and the contemnor’s ability to pay.” *Paramedics*, 369 F.3d at 658 (quoting *Perfect Fit Indus. v. Acme Quilting Co.*, 673 F.2d 53, 57 (2d Cir. 1982)); see also *IBM Corp. v. United States*, 493 F.2d 112, 115 (2d Cir. 1973) (“In regard to the amount of the coercive fine it was proper for the court to take into account the contemnor’s resources and ability to pay.”).

Here, Western Union’s contempt deprives the FTC of documents that this Court ordered it receive and that are central to the FTC’s investigation of Western Union’s policies and procedures. The Commission’s investigation is compromised without these documents. Contempt Exh. 1 ¶ 20. Daily monetary sanctions will be effective in bringing about compliance because Western Union will face the choice of either providing the required information or paying the avoidable and unnecessary expense of daily fines. Finally, Western Union has a substantial ability to pay daily monetary sanctions. According to the company’s public filings, it

had a net income of \$1,025,900,000. *See id.* ¶ 22; Western Union, Annual Report at 84-85 (Form 10-K) (Feb. 22, 2013), available at <http://www.sec.gov/Archives/edgar/data/1365135/000136513513000008/wu-12312012x10k.htm>. In *IBM Corp.*, the district court imposed daily monetary sanctions for IBM's failure to produce documents in response to a pretrial discovery order. The Court of Appeals affirmed the sanction – \$150,000 per day – finding that sum only 5% of IBM's given daily earnings. 493 F.2d at 116. A comparable fine of 5% of Western Union's daily earnings would be \$140,534. Contempt Exh. 1 ¶ 22.

In sum, the FTC respectfully requests that the Court enter an order directing Western Union to appear and show cause why it should not be held in contempt for violating the June 7 order and why the following relief should not be granted against it:

First, that the Court order Western Union to comply with the June 7 order by executing the final search protocol issued by the FTC on August 8, 2013 and begin producing the results to the FTC no later than November 18, 2013 (“Contempt Order”);

Second, that the Court further direct Western Union to complete production of all responsive information and provide the certification of compliance required by paragraph 16 of the June 7 order no later than December 20, 2013;

Third, that the Court impose upon Western Union coercive sanctions of \$140,534 per day for (1) each day between November 18, 2013 and the first production of information to the FTC resulting from execution of the final search protocol, and (2) for each day between December 20, 2013 and production of the certification of compliance pursuant to paragraph 16 of the June 7 order; and

For such other relief as the Court deems just and proper; or

Alternatively, should the Court determine that coercive daily monetary sanctions are not warranted, the Court should nonetheless find Western Union in contempt and order that the company comply with the final search protocol and produce the responsive documents by December 20, 2013.

CONCLUSION

For the reasons set forth above, the FTC respectfully requests that the Court enter an Order to Show Cause why Western Union should not be held in civil contempt for violating the June 7 order.

Respectfully submitted,

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