

IN THE  
**Supreme Court of the United States**

\_\_\_\_\_  
DELAWARE,

*Plaintiff,*

v.

PENNSYLVANIA AND WISCONSIN,  
*Defendants.*

\_\_\_\_\_  
ARKANSAS, *et al.*,

*Plaintiffs,*

v.

DELAWARE,

*Defendant.*

\_\_\_\_\_

**DECLARATION OF KATHERINE B. WELLINGTON IN SUPPORT OF  
OPPOSITION TO PENNSYLVANIA’S MOTION FOR IMMEDIATE  
WITHDRAWAL OF DEPOSITED FUNDS**

I, KATHERINE B. WELLINGTON, hereby declare as follows:

1. I am a member of the law firm of Hogan Lovells US LLP, counsel for the State of Delaware. I am admitted to practice law in this Court.

2. I make this declaration in support of Delaware’s Opposition to Pennsylvania’s Motion for Immediate Withdrawal of Deposited Funds. I am familiar with the facts and circumstances stated herein.

3. Attached hereto as **Exhibit A** is a true and accurate copy of a letter sent on May 18, 2023 to Michael Rato of Reed Smith LLP, counsel for

MoneyGram Payment Systems, Inc. (“MoneyGram”), from Katherine B.

Wellington of Hogan Lovells US LLP, counsel for the State of Delaware.

4. Attached hereto as **Exhibit B** is a true and accurate copy of a letter sent on June 1, 2023 to Katherine B. Wellington of Hogan Lovells US LLP, counsel for the State of Delaware, from Michael Rato of Reed Smith LLP, counsel for MoneyGram.

5. Attached hereto as **Exhibit C** is a true and accurate copy of the Declaration of Susan Johnson, dated May 31, 2023.

6. Attached hereto as **Exhibit D** is a true and accurate copy of the Declaration of Colleen Elvin, dated May 31, 2023.

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

Dated: August 2, 2023  
Boston, MA

/s/ Katherine B. Wellington  
Katherine B. Wellington

# **EXHIBIT A**

May 18, 2023  
Michael Rato  
Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022-7650

**By Electronic Mail**

**Re: Preliminary observations regarding datasets for funds in escrow.**

Dear Mr. Rato,

Delaware has begun a preliminary assessment of data provided by MoneyGram Payment Systems, Inc. (“MoneyGram”) regarding the funds in escrow. This preliminary assessment has raised questions regarding the accuracy of the “financial institution address” field. Delaware requests further explanations from MoneyGram to potentially resolve these questions in an expeditious and informal manner.

Delaware’s preliminary assessment indicates that there may be reason to believe that—at least in some cases—“the financial institution address” for the funds in escrow does not reflect the physical address at which an instrument was purchased, but may instead reflect another address associated with the financial institution. For instance, hundreds of addresses are listed “care of” a different financial institution. The “care of” language suggests these addresses—and potentially others in MoneyGram’s data—reflect the institution’s mailing address and are not associated with a physical place of purchase.

Likewise, in a considerable number of cases, the addresses in MoneyGram’s records appear to be a financial institution’s corporate headquarters or a similar office. For instance:

- Approximately \$1.6 million worth of unclaimed instruments are associated with [REDACTED]. MoneyGram’s records contain only one address for [REDACTED], which appears to be an office in [REDACTED], Michigan, but [REDACTED] has branches in multiple States.
- Approximately \$1 million worth of unclaimed instruments are associated with [REDACTED]. MoneyGram’s records contain only one address for [REDACTED], which appears to be an office in [REDACTED] Alabama. Like [REDACTED], [REDACTED] has branches in multiple States.

- Approximately \$1.2 million worth of approximately 6,500 unclaimed instruments are associated with [REDACTED]. The overwhelming majority of those instruments—over 6,200 instruments worth nearly \$1.0 million—are associated with what appears to be an office located at [REDACTED] in [REDACTED], PA. [REDACTED] also appears to have had branches in multiple States.
- Approximately \$11,000 worth of instruments are associated with [REDACTED]. MoneyGram's records contain only one address for [REDACTED], which appears to be an office in [REDACTED], PA. [REDACTED] also appears to have branches in multiple States.

In the interest of expeditiously resolving this matter, please provide answers to the following questions and produce the following documents with respect to the escrowed funds by no later than one week from the date of this letter:

- Please identify the employees responsible for recording the “financial institution address” field, including their titles and roles at MoneyGram.
- Please produce any documents describing the processes and policies MoneyGram followed to generate and record this data.
- Please produce any documents setting forth any quality control measures to determine the accuracy of the “financial institution address” field.
- If no documents exist as to either (i) the processes and policies followed to generate and record this data, or (ii) the quality control measures in place, please describe any such processes, policies or procedures in place to generate and record, and ensure the accuracy of the “financial institution” address field. Please also identify any persons at MoneyGram with knowledge regarding the foregoing.
- Where the data lists the address “care of” another institution, please identify and produce any data, documents or information that demonstrates whether the “care of” address reflects the place of purchase.
- Please produce any documents or information regarding MoneyGram's use of “care of” addresses for the “financial institution address” field, or to reflect the place of purchase.
- Where MoneyGram's records contain addresses identified as corporate headquarters and offices, please identify and produce any data, documents or information that demonstrates whether the listed corporate headquarters and offices reflect places of purchase.

- Please produce any documents regarding MoneyGram's use of corporate headquarters and offices for "financial institution address" field, or to reflect the place of purchase.

Thank you for your prompt attention in this matter. Subject to your responses, we may have additional questions or follow-up requests. All rights reserved in the interim.

Sincerely,

/s/ Katherine B. Wellington  
Katherine B. Wellington

cc: counsel of record by email.

# **EXHIBIT B**

June 1, 2023

**Confidential and Proprietary Information****By Electronic Mail**

Katherine B. Wellington  
Hogan Lovells US LLP  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004

***Delaware v. Arkansas, et al.* - U.S. Supreme Court Docket Nos 22O145 & 22O146 (Consolidated)  
Response to May 18, 2023 Letter Regarding Official Check Escrow Data**

Dear Counsel:

We are in receipt of your May 18, 2023 letter concerning MoneyGram Payment Systems, Inc.'s ("MoneyGram") Official Check data for items deposited into the escrow fund established pursuant to the Special Master's order in the above-captioned action (the "Escrow Deposits"). You requested that MoneyGram provide documents and information concerning, *inter alia*, MoneyGram's "recording" of financial institution address information relating to Official Checks and the policies MoneyGram uses to "generate" these addresses.

These questions, by and large, presume that MoneyGram is responsible for "generating" or "recording" address information concerning an Official Check transaction, which is not correct. Accordingly, in lieu of responding to the requests in your May 18 letter, MoneyGram is providing two declarations. The first, from Colleen Elvin in MoneyGram's Government Affairs group, provides an index of all of the fields included in the Escrow Deposit data files. The second, from Susan Johnson in MoneyGram's Client Support group, describes how Official Check client accounts are setup, how Official Check data is provided to MoneyGram, and how that data is maintained.

As described in further detail in those declarations, generally, when a financial institution sells (to a third party) or uses (in the case of its own disbursement) an Official Check, it is responsible for reporting that transaction to MoneyGram on a daily basis. Those client reports include a Customer number associated with the particular location reporting the sale which, in turn, is associated with an address that is provided by MoneyGram's client (not MoneyGram) during setup. Therefore, MoneyGram's client is the ultimate source of information relating to the issuance of an Official Check. MoneyGram, in turn, maintains that information and has provided the most specific address information available to it concerning the Official Checks in the Escrow Deposit.

The exception to the foregoing is in the case of Official Checks that are shown in the data as issued by a particular financial institution "care of" or "c/o" a separate financial institution. That scenario is explained



Katherine B. Wellington  
June 1, 2023  
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ReedSmith

in the accompanying declaration of Susan Johnson. In any event, it appears that issue is present in less than 0.26% (twenty-six hundredths of a percent) of the data and potentially changes the state of escheatment in 0.035% (thirty-five thousandths of a percent) of the data by dollar amount.

I hope that you find this information helpful. Please do not hesitate to contact me if you have any questions.

Very truly yours,

*Michael Rato*

Michael Rato  
Reed Smith LLP

MR

Enclosures

cc: Counsel of Record

# **EXHIBIT C**

Michael Rato  
**Reed Smith LLP**  
599 Lexington Avenue  
New York, NY 10022-7650  
(212) 521 5400  
*Attorney for Non-Party MoneyGram Payment Systems, Inc.*

**IN THE SUPREME COURT OF THE UNITED STATES**

State of Delaware,

Plaintiff,

vs.

State of Arkansas, et al.,

Defendants.

Docket No. 22O145 & 22O146 (Consolidated)

**Declaration of Susan Johnson**

Susan Johnson, pursuant to 28 U.S.C. § 1476 hereby declares:

1. I am a Client Support Analyst II employed by MoneyGram International, Inc. (“MGI”). Part of my responsibilities at MGI involve set up and support of client accounts in the Edison system, used to record data relating to Official Checks issued by MoneyGram Payment Systems, Inc. (collectively with MGI, “MoneyGram”). I make this declaration from my own personal knowledge.

2. Official Checks are tracked by MoneyGram using a computerized platform referred to as “Edison.”

3. For example, the Edison platform may be used to determine whether a particular Official Check is paid or still outstanding, and to review details regarding those checks such as the issue date, serial number, and amount.

4. In addition, MoneyGram used Edison as the source of the information used to report unclaimed Official Checks to Delaware and to identify those unclaimed Official Checks deposited with the Court in connection with this matter.

5. Each MoneyGram client that issues Official Checks (hereinafter, the “Client”) is assigned a “Parent” number in Edison. Generally, that “Parent” is the Client entity that contracts with MoneyGram to sell Official Checks.

6. In addition, each Client may designate multiple “Customer” locations where Official Checks will be sold (i.e., to a third party) or used (i.e., by the Client to make its own disbursements), each of which will have a unique “Customer” number. In other words, a “Parent” number in the Edison system may be associated with several “Customer” numbers.

7. Each individual “Customer” location that is setup by the Client is associated with an account specific number and address that is stored in the Edison system.

8. It should be noted, however, that the manner in which a Client’s Official Check program was structured (e.g., as to the use of multiple “Customer” locations) was generally left to the Client’s discretion. In other words, each Client had the ability, but not the obligation, to identify to MoneyGram all of the locations from which Official Checks would be sold and/or issued and have data for those locations tracked separately (through the use of individual “Customer” numbers).

9. When financial institution address information is provided in connection with a particular Official Check, that address is most accurately described as the address in MoneyGram’s Edison system associated with the “Customer” location that reported the sale/issuance of that Official Check to MoneyGram.

10. MoneyGram cannot verify that the specific financial institution address associated with a specific Official Check in the Edison system is the physical location where the item was purchased (though it is my understanding that is usually the case). However, MoneyGram can verify that such an address is the most granular level of address information associated with a particular Official Check that is available to MoneyGram.

11. To the extent that a Client financial institution with multiple physical locations has only one address associated in the Edison system or has one address that is associated with a substantial number of Official Checks as compared to other locations, there are a number scenarios that could cause this

12. As noted above, a Client historically had the ability to report and record the issuance of all Official Checks out of a single location if it chose to do so. The decision to report all Official Checks out of a single location, however, is a decision that is made by the Client, not by MoneyGram. MoneyGram offers Client the ability – and indeed, most Clients do, in fact – report the issuance of Official Checks out of multiple locations.

13. In addition, a substantial amount of Official Checks may be associated with a single Client location where that location uses Official Checks for its own disbursements such as interest payments, vendor payments, and the like.

14. In all events, the address information in Edison is provided by the Client, not MoneyGram.

15. There are instances in which the Edison data shows an Official Check issued by a particular financial institution with a different financial institution or location listed as a “care of” address. There are two separate circumstances that can cause this.

16. First, some Clients have interest checks issued and sent out by a third-party service provider such as D&H or Harlan Financial Solutions. In these instances, the address listed is generally the D&H or Harlan location where the check was actually issued. For example, the 2018 data shows Official Checks for [REDACTED] (located in Kentucky) that were issued by Harland Financial Solutions in Florida. To the best of MoneyGram’s knowledge, these checks were issued in the State of Florida, thus the data is accurate.

17. The second circumstance where a “care of” address may appear is when a Client financial institution is subsequently acquired by a different financial institution. Prior to December 2016, the address information would be updated to the acquirer’s address information to facilitate communications and recordkeeping with the customer (e.g., paper statements of outstanding items were still sent at this time). In these limited instances, the state listed is of the acquirer, not the original customer.

18. I have reviewed MoneyGram’s historical records to determine if any of these “care of” address change the state listed as the “financial institution state” in the data provided, with the following results:

- a. [REDACTED] – No change (CA)
- b. [REDACTED] – No change (FL)
- c. [REDACTED] – Should be Florida
- d. [REDACTED] – Should be North Carolina
- e. [REDACTED] – No change (TX)
- f. [REDACTED] – No change (VA)
- g. [REDACTED] – No change (WA)
- h. [REDACTED] – Should be Minnesota
- i. [REDACTED] – No change (LA)

I declare under penalty of perjury under that the foregoing is true and correct.  
Executed this the 31st day of May, 2023.

*Susan Johnson*  
\_\_\_\_\_  
Susan Johnson

# **EXHIBIT D**



Michael Rato  
**REED SMITH LLP**  
599 Lexington Avenue  
New York, NY 10022-7650  
(212) 521 5400

*Attorney for Non-Party MoneyGram Payment Systems, Inc.*

**IN THE SUPREME COURT OF THE UNITED STATES**

State of Delaware,

Plaintiff,

vs.

State of Arkansas, et al.,

Defendants.

Docket No. 22O145 & 22O146  
(Consolidated)

**Declaration of Colleen Elvin**

Colleen Elvin, pursuant to 28 U.S.C. § 1476 hereby declares:

1. I am a Government Affairs Manager employed by MoneyGram International, Inc. (“MGI”). Part of my responsibilities at MGI involve facilitating the reporting and remitting of unclaimed property – including Official Checks – to the several states. I make this declaration from my own personal knowledge.

2. Pursuant to an order from the Special Master in this litigation, non-party MoneyGram Payment Systems, Inc. (“MoneyGram”) made three deposits (the “Escrow Deposits”) into the Court Registry Investment System (“CRIS Account”) maintained by the U.S. District Court for the Southern District of New York under miscellaneous docket number 1:18-mc-0064-PNL. A printout of the docket sheet maintained by the U.S. District Court for the Southern District of New York reflecting the Escrow Deposits is attached hereto as Exhibit A.

3. On or about March 30, 2018, MoneyGram deposited \$20,726,250.41 into the CRIS Account (the “First Escrow Deposit”). The First Escrow Deposit consisted of uncashed

MoneyGram Official Checks that were outstanding for five years or more as of calendar year 2017 and would have been reportable to Delaware in 2018. A listing of the items included in the First Escrow Deposit has already been provided to the parties' counsel in the file named "2018 Supreme Court Deposit."

4. With regard to the file titled "2018 Supreme Court Deposit" the data columns have the following meanings:

- (a) "Financial Institution Name" – This is the name of the MoneyGram-client financial institution.
- (b) "Customer" – This is the MoneyGram-designated customer number of the financial institution client that issued the specific Official Check. There may be multiple "Customer" numbers associated with the same "Parent."
- (c) "Parent" – This is the MoneyGram-designated parent number of the financial client with whom MoneyGram has contracted to issue Official Checks. A "Parent" may have multiple associated "Customer" numbers.
- (d) "Product" – This is MoneyGram's designation of the "Product Type." Product 15 denotes an Official Check-Agent Check and Product 16 denotes an Official Check-Teller Check.
- (e) "Use" – This is a code that the client financial institution may use to designate the disbursement type. Use of this field is not required by MoneyGram. Disbursement Types include:
  - 00 – General Purpose
  - 01 – Dividend Check
  - 02 – Escrow Check
  - 03 – Expense Check
  - 04 – Holiday Club
  - 05 – Interest Check
  - 06 – Loan Check
  - 07 – Money Order
  - 08 – Payroll Check
  - 09 – Gift Certificate
  - 10 – Teller check
  - 11 – Cashier Check
  - 12 – Official Check
  - 13 – Treasury Check
  - 14 – Mortgage
  - 15 – Accounts Payable
  - 16 – Trust
  - 17 – IRA
- (f) "Item Serial Number" – The serial number of the Official Check.

- (g) “Last Transaction Date” – With regard to Official Checks, this is the date of issuance.
- (h) “Amount” – The amount of the Official Check
- (i) “Financial Institution Address 1” – This is the address of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (j) “Financial Institution Address 2” – Same as above.
- (k) “Financial Institution City” – This is the city of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (l) “Financial Institution State” – This is the state of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (m) “Financial Institution Zipcode” – This is the zip code of the specific financial institution customer facility that reported the issuance of the Official Check (except in the case of certain “care of” items). Note that in some instances, a leading zero appears to be omitted by Excel. For example, according to the U.S. Postal Service website, the correct zip code for Pawtucket, Rhode Island is 02861. In the data it appears as “2861.” *See e.g., Line 46230* Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.

5. On or about March 10, 2021, MoneyGram deposited \$55,878,657.95 into the CRIS Account (the “Second Escrow Deposit”). The Second Escrow Deposit consisted of uncashed MoneyGram Official Checks for which a five-year period of dormancy elapsed during calendar years 2018 through 2020, and would have been reportable to Delaware in year 2019 through 2021. A listing of the items included in the Second Escrow Deposit (separated by year of dormancy) has already been provided to the parties’ counsel in the files named “2021 Deposit 2019 Agent + Teller Check Breakout,” “2021 Deposit 2020 Agent + Teller Check Breakout,” and “2021 Deposit 2021 Agent + Teller Check Breakout.” Note that the aggregate amount of these spreadsheets is higher than Second Escrow Deposit because the parties stipulated to allow MoneyGram to withhold the

amount of \$2,990,709.83 on account of Official Check proceeds that were included in the First Escrow Deposit that MoneyGram subsequently honored and paid.

6. With regard to the file titled “2021 Deposit 2019 Agent + Teller Check

Breakout,” the data columns have the following meanings:

- (a) “Financial Institution Name” – This is the name of the client financial institution.
- (b) “Customer” – This is the MoneyGram-designated customer number of the financial institution client that issued the specific Official Check. There may be multiple “Customer” numbers associated with the same “Parent.”
- (c) “Parent” – This is the MoneyGram-designated parent number of the financial client with whom MoneyGram has contracted to issue Official Checks. A “Parent” may have multiple associated “Customer” numbers.
- (d) “Product” – Not used.
- (e) “Use” – Not used.
- (f) “Item Serial Number” – The serial number of the Official Check.
- (g) “Last Transaction Date” – With regard to Official Checks, this is the date of issuance.
- (h) “Amount” – The amount of the Official Check
- (i) “Financial Institution Address 1” – This is the address of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (j) “Financial Institution Address 2” – Same as above.
- (k) “Financial Institution City” – This is the city of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (l) “Financial Institution State” – This is the state of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (m) “Financial Institution Zipcode” – This is the zip code of the specific financial institution customer facility that reported the issuance of the Official Check (except in the case of certain “care of” items). Note that in some instances, a leading zero appears to be omitted by Excel. For example, according to the U.S. Postal Service website, the correct zip code for Iselin, New Jersey is 08830. In the data it appears as “8830.” *See e.g., Line 60344* Please see the accompanying

Declaration of Susan Johnson for further information regarding how this information is obtained.

- (n) “Drop Period” – The cutoff date for this particular report. Here, December 31, 2018.

7. With regard to the file titled “2021 Deposit 2020 Agent + Teller Check Breakout”

the data columns have the following meanings:

- (a) “PRNT\_CUST\_NBR” – This is the MoneyGram-designated customer number of the financial institution client with whom MoneyGram has contracted to issue Official Checks.
- (b) “DBA\_NAME” – This is the name of the client financial institution.
- (c) “STATE” – This is the state to which the Official Checks would have been escheated if not deposited with the Court.
- (d) NAUPA\_CODE – This a code assigned by the National Association of Unclaimed Property Administrators (NAUPA) that MoneyGram has historically used to escheat Official Check funds.
- (e) ISSUE\_DATE – The date that the Official Check was issued.
- (f) PDT\_TYPE-USE-CUST – This is the account number that the financial institution client reported to MoneyGram as the issuing account location.
- (g) ISSUE AMT – This is the value of the Official Check at issuance.
- (h) ITEM\_SN – The serial number of the Official Check.
- (i) SVC\_CHG – This column would denote service charges, if assessed.
- (j) ESCHT\_AMT – The amount escheated. This is the same as the “ISSUE AMT” as no service charges are assessed.
- (k) SHIPTO\_PDT\_TYPE-SHIPTO\_USE-SHIPTO\_CUST\_NO – This is the account number that is printed on the MICR line of the physical check.
- (l) PERIOD\_END\_DATE – This is the reporting cutoff date.
- (m) ADDR\_LINE1 – This is the address of the specific customer facility that reported the issuance of the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (n) ADDR\_LINE2 – Same as above.
- (o) CITY – This is the city of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.

- (p) PRNT\_STATE – This is the state of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
  - (q) ZIPCODE – This is the zip code of the specific financial institution customer facility that reported the issuance of the Official Check (except in the case of certain “care of” items). Note that in some instances, a leading zero appears to be omitted by Excel. For example, according to the U.S. Postal Service website, the correct zip code for Iselin, New Jersey is 08830. In the data it appears as “8830.” See e.g., Line 65868. Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained. .
  - (r) COUNTRY – The country where the issuing financial institution facility is located.
8. With regard to the file titled “2021 Deposit 2021 Agent + Teller Check Breakout”

the data columns have the following meanings:

- (a) “PRNT\_CUST\_NBR” – This is the MoneyGram-designated customer number of the financial institution client with whom MoneyGram has contracted to issue Official Checks.
- (b) “DBA\_NAME” – This is the name of the client financial institution.
- (c) “STATE” – This is the state to which the Official Checks would have been escheated if not deposited with the Court.
- (d) NAUPA\_CODE – This a code assigned by the National Association of Unclaimed Property Administrators (NAUPA) that MoneyGram has historically used to escheat Official Check funds.
- (e) ISSUE\_DATE – The date that the Official Check was issued.
- (f) PDT\_TYPE-USE-CUST – This is the account number that the financial institution client reported to MoneyGram as the issuing account location.
- (g) ITEM\_SN – The serial number of the Official Check.
- (h) ESCHT\_AMT – The amount escheated.
- (i) SVC\_CHG – This column would denote service charges, if assessed.
- (j) SHIPTO\_PDT\_TYPE-SHIPTO\_USE-SHIPTO\_CUST\_NO – This is the account number that is printed on the MICR line of the physical check.
- (k) PERIOD\_END\_DATE – This is the reporting cutoff date.
- (l) ADDR\_LINE1 – This is the address of the specific customer facility that reported the issuance of the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.

- (m) ADDR\_LINE2 – Same as above.
- (n) CITY – This is the city of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (o) PRNT\_STATE – This is the state of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (p) ZIPCODE – This is the zip code of the specific financial institution customer facility that reported the issuance of the Official Check (except in the case of certain “care of” items). Note that in some instances, a leading zero appears to be omitted by Excel. For example, according to the U.S. Postal Service website, the correct zip code for Iselin, New Jersey is 08830. In the data it appears as “8830.” See e.g., *Line 74000*. Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (q) COUNTRY – The country where the issuing financial institution facility is located.

9. On or about August 30, 2022, MoneyGram deposited \$17,543,024.79 into the CRIS Account (the “Third Escrow Deposit”). The Third Escrow Deposit consisted of uncashed MoneyGram Official Checks for which a five-year period of dormancy elapsed during calendar year 2021, and would have been reportable to Delaware in 2022. A listing of the items included in the Third Escrow Deposit has already been provide to the parties’ counsel in the file named “2022 Supreme Court Deposit.” The aggregate amount of this file is higher than the Third Escrow Deposit because the parties stipulated to allow MoneyGram to withhold the amount of \$3,515,398.76 on account of Official Check proceeds that were included in the First Escrow Deposit or the Second Escrow Deposit, that MoneyGram subsequently honored and paid.

10. With regard to the file titled “2022 Supreme Court Deposit” the data columns have the following meanings:


- (a) “PRNT\_CUST\_NBR” – This is the MoneyGram-designated customer number of the financial institution client with whom MoneyGram has contracted to issue Official Checks.
- (b) “DBA\_NAME” – This is the name of the client financial institution.

- (c) “STATE” – This is the state to which the Official Checks would have been escheated if not deposited with the Court.
- (d) NAUPA\_CODE – This a code assigned by the National Association of Unclaimed Property Administrators (NAUPA) that MoneyGram has historically used to escheat Official Check funds.
- (e) ISSUE\_DATE – The date that the Official Check was issued.
- (f) PDT\_TYPE-USE-CUST – This is the account number that the financial institution client reported to MoneyGram as the issuing account location.
- (g) ITEM\_SN – The serial number of the Official Check.
- (h) ESCHT\_AMT – The amount escheated.
- (i) SVC\_CHG – This column would denote service charges, if assessed.
- (j) SHIPTO\_PDT\_TYPE-SHIPTO\_USE-SHIPTO\_CUST\_NO – This is the account number that is printed on the MICR line of the physical check.
- (k) PERIOD\_END\_DATE – This is the reporting cutoff date.
- (l) ADDR\_LINE1 – This is the address of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (m) ADDR\_LINE2 – Same as above.
- (n) CITY – This is the city of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (o) PRNT\_STATE – This is the state of the specific customer facility that reported the issuance the Official Check (except in the case of certain “care of” items). Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (p) ZIPCODE – This is the zip code of the specific financial institution customer facility that reported the issuance of the Official Check (except in the case of certain “care of” items). Note that in some instances, a leading zero appears to be omitted by Excel. For example, according to the U.S. Postal Service website, the correct zip code for West Orange, New Jersey is 07052. In the data it appears as “7052.” See e.g., *Line 28000*. Please see the accompanying Declaration of Susan Johnson for further information regarding how this information is obtained.
- (q) COUNTRY – The country where the issuing financial institution facility is located.



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

Executed this the 31<sup>st</sup> day of May, 2023.

  
\_\_\_\_\_  
Colleen Elvin