

STATE OF TEXAS

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TRAVIS COUNTY

AFFIDAVIT OF ROSALINDA O. FIERRO

Before me, the undersigned authority, on this day, personally appeared ROSALINDA O. FIERRO, known to me to be the person whose name is subscribed to the following instrument, and having been by me duly sworn upon her oath, deposes and states as follows:

1. My name is ROSALINDA O. FIERRO. I am over the age of eighteen years, am an adult resident of Travis County, Texas, and am fully competent and able to testify herein. I have personal knowledge of all of the facts set forth herein, and am able to swear, as I hereby do swear, that all of said facts and statements herein contained are true and correct.

2. I am employed as an Investigator in the Consumer Protection Division of the Office of the Attorney General of the State of Texas.

3. Pursuant to Texas Business and Commerce Code, Chapter 17, the Attorney General, and authorized members of the division, have the authority granted and a duty imposed by law to investigate, observe and report information regarding any act or practice declared to be unlawful by this chapter or other applicable law and to conduct an investigation when it is reasonably believed to be in the public interest to ascertain whether a person or entity is engaging in, has engaged in, or is about to engage in any such act or practice.

4. In the course of such duties and activities, as an authorized member of this Division, on November 30, 2012, I checked at the Texas Secretary of State's website to determine whether or not Christmas Bureau of Austin and Travis County, an Internal Revenue Code §501(c)(3) tax exempt charitable organization with EIN 23-7382791 is registered as a corporation. I was unable to locate any information under the entity's name. I checked under Shonneel Neel Washington, aka Shon Washington, and Shon Neel Washington, who is the President/Director. There is a filing for CRC Fellowship that lists Mr. Washington as Director. It was filed on August 10, 2007. In addition, I also checked for any

**STATE'S
EXHIBIT**

registration under the name of Michelle Washington who is listed as a director of Christmas Bureau of Austin and Travis County on the organization's website. The only listing with the Secretary of State's office indicates that she is a director of CRC Fellowship. The Travis County Clerk's Office, Assumed Name Section has an assumed name certificate on file for "Christmas Bureau of Austin and Travis County". Shon Washington is listed as the sole owner. This certificate was filed on November 23, 2011.

5. On December 3, 2012, I went to the Christmas Bureau of Austin and Travis County website located at <http://www.cbofaustin.org>. At the home page, I clicked on the "DONATE" link. This link is a form that a donor fills out with the donor's personal information, including credit card information. At the top right hand corner of the page there is box for the amount of donation. After filling out the information, a message popped up indicating that I had to provide an amount before the transaction could continue. At that point, I stopped recording the website. The attached compact disc is a true and correct image of the files downloaded from that website identified by the URL <http://www.cbofaustin.org>. (Exhibit E1)

6. On this same date, I called the telephone number listed on the website (512)453-3950 and I got a recording stating that the number was not in service.

7. On December 3, 2012, I called the Texas Secretary of State, Document Section to ask that a search for the name of the organization and Shonneel Neel Washington, aka Shon Washington, Shon Neel Washington, and Michelle Washington be done. The search results indicate that only the CRC Fellowship has a filing, listing both Shon Washington and Michelle Washington as directors.

8. On December 3, 2012, I called the Texas Comptroller of Public Accounts to determine whether or not Christmas Bureau of Austin and Travis County has a certificate of exemption. I was informed that there an application was filed in 1974.

9. On December 4, 2012, we received information from PayPal regarding Christmas Bureau of Austin and Travis County's account. According to that information, this account was created on November 4, 2004 and it has Clift Bowman's user info, including social security number. In the last three months, \$26,067.00 was received in this account for Christmas Bureau of Austin and Travis County; the

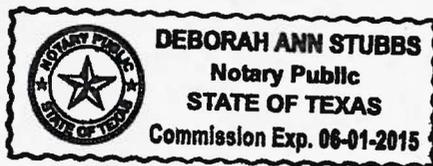
balance as of December 4, 2012 is \$210.43. The address for the account was P.O. Box 9015, Austin, Texas 78766; however on September 9, 2011, the address was changed to 341 Lower Red Rock Rd., Bastrop, Texas 78602, which is Shon Washington's residence address. I have attached a copy of the Account information provided by PayPal. (Exhibit E2)

10. On December 4, 2012, I went to the address listed on the Christmas Bureau of Austin and Travis County website, 4612 Burlison Rd., Unit L, Austin, Texas 78744. The door was locked and the face of the office was covered with cardboard. There was a handwritten sign indicating that the Bureau had moved with no forwarding address with "Contact Blue Santa" on the sign. I have attached two photographs that were taken of Unit L on this date. (Exhibit E3)



ROSALINDA O. FIERRO
Investigator
Consumer Protection Division
P.O. Box 12548
Austin, Texas 78748

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, by ROSALINDA O. FIERRO this 5th day of December, 2012 at Travis County, Texas.



Notary without Bond



Notary Public in and for the State of Texas

cbofaustin.org

EXHIBIT

tabbles

EI

Catured 12/04/2012

R. Fierro



Account Info for Clift Bowman

User Info

First Name:	Clift
Middle Name:	
Last Name:	Bowman
SSN:	[REDACTED]
TIN:	23-7382791
DOB:	
Credit Card Statement Name:	CHRISTMASBU
Email:	[REDACTED]

Business Info

Name:	Christmas Bureau of Austin & Travis County
URL:	
Customer Service Phone:	512-317-7901 - Unknown Trust

Account Info

Account Status:	Open
Account #:	[REDACTED]
Account Type:	Business - Verified - Cat70H
Time Created:	Nov 4, 2004 22:48:04 MST

Financials

Account Balance:	\$210.43 USD
Total Amount Sent (USD Equiv):	\$252.00 USD
Total Amount Received:	\$188,476.77 USD
Amount Received: (A month is determined by user's signup date, NOT by a calendar month)	Current Month: \$337.00 USD Last 3 Months: \$26,967.00 USD \$127.00 USD \$30.00 USD
Pending Balance To Be Released:	
Minimum Reserve Balance:	\$0.00 USD* (0% - \$0.00 USD) [Details]
Rolling Reserve Balance:	\$0.00 USD* (0% - 0 days) [Details]

E-mail

E-mail	Primary	Confirmed	Active
[REDACTED]	✓	✓	✓
[REDACTED]		✓	
[REDACTED]		✓	
[REDACTED]		✓	✓
[REDACTED]		✓	

Allises

Name	Login Alias	Privileges	Active

Phone numbers

Phone Number	Type	Confirmation Status
512-454-4304	Work	Unconfirmed - No Attempt (Invalid)
512-354-9380	Work - Deleted	Unconfirmed - No Attempt
512-473-9962	Work - Deleted	Unconfirmed - No Attempt
512-477-3153	Work - Deleted	Unconfirmed - No Attempt
512-799-3460	Work - Deleted	Unconfirmed - No Attempt
512-317-7901	Customer Service	Unconfirmed - No Attempt
512-453-3950	Customer Service - Deleted	Unconfirmed - No Attempt
512-473-9962	Mobile - Deleted	Unconfirmed - No Attempt

Addresses

Date Entered	Address	Use
9/22/2011	Christmas Bureau of Austin & Travis County 341 Lower Red Rock Rd Bastrop, TX 78602 United States	
12/6/2008	Christmas Bureau of Austin & Travis County P. O. Box 9015 Austin, TX 78766-9015 United States	(Home)

IP Summary



IPs	Logins	First Used	Last Used	Status
70.113.17.68	3	Nov 26, 2012 08:07:49 MST	Nov 28, 2012 21:45:29 MST	
24.242.184.170	2	Nov 26, 2012 11:59:05 MST	Nov 28, 2012 09:13:36 MST	
24.73.247.82	1	Nov 6, 2012 13:52:06 MST	Nov 6, 2012 13:52:06 MST	
69.171.166.141	1	Nov 4, 2012 09:22:26 MST	Nov 4, 2012 09:22:26 MST	
66.87.7.168	1	Oct 14, 2012 21:58:53 MDT	Oct 14, 2012 21:58:53 MDT	
168.39.73.232	2	Sep 24, 2012 15:13:15 MDT	Sep 24, 2012 15:17:34 MDT	
69.171.178.21	1	Sep 24, 2012 12:10:51 MDT	Sep 24, 2012 12:10:51 MDT	
69.171.166.209	2	Jul 17, 2012 08:11:38 MDT	Jul 17, 2012 09:24:25 MDT	
69.171.166.163	1	Jan 12, 2012 07:39:00 MST	Jan 12, 2012 07:39:00 MST	
70.114.203.216	2	Dec 13, 2011 08:08:09 MST	Jan 4, 2012 12:21:14 MST	
69.171.166.53	1	Dec 29, 2011 23:26:41 MST	Dec 29, 2011 23:26:41 MST	
69.171.166.129	2	May 8, 2011 21:39:12 MDT	Dec 28, 2011 17:03:02 MST	
70.253.78.151	4	Dec 20, 2011 14:36:32 MST	Dec 25, 2011 11:27:31 MST	
69.171.187.88	2	Dec 22, 2011 17:16:08 MST	Dec 24, 2011 21:11:55 MST	
69.171.178.71	1	Dec 23, 2011 12:55:37 MST	Dec 23, 2011 12:55:37 MST	
69.171.187.87	2	Dec 19, 2011 16:49:11 MST	Dec 22, 2011 21:08:25 MST	
69.171.178.26	2	Dec 22, 2011 07:30:05 MST	Dec 22, 2011 07:30:08 MST	
69.171.187.92	1	Dec 20, 2011 20:00:11 MST	Dec 20, 2011 20:00:11 MST	
69.171.178.9	2	Dec 17, 2011 07:00:55 MST	Dec 18, 2011 18:28:10 MST	
69.171.178.82	1	Dec 16, 2011 18:40:36 MST	Dec 16, 2011 18:40:36 MST	
69.171.187.72	1	Dec 16, 2011 07:25:49 MST	Dec 16, 2011 07:25:49 MST	
69.171.187.89	1	Dec 14, 2011 11:05:46 MST	Dec 14, 2011 11:05:46 MST	
69.171.187.7	1	Dec 11, 2011 18:52:15 MST	Dec 11, 2011 18:52:15 MST	
70.253.74.15	5	Dec 7, 2011 11:32:44 MST	Dec 10, 2011 08:45:14 MST	
69.171.166.39	1	Dec 6, 2011 20:41:32 MST	Dec 6, 2011 20:41:32 MST	
69.171.166.71	1	Dec 5, 2011 15:24:35 MST	Dec 5, 2011 15:24:35 MST	
69.171.166.207	1	Dec 1, 2011 18:44:22 MST	Dec 1, 2011 18:44:22 MST	
69.171.166.60	1	Nov 9, 2011 13:02:42 MST	Nov 9, 2011 13:02:42 MST	
69.171.166.208	1	Oct 15, 2011 06:47:37 MDT	Oct 15, 2011 06:47:37 MDT	
108.71.243.53	1	Sep 30, 2011 12:29:48 MDT	Sep 30, 2011 12:29:48 MDT	
69.171.166.211	3	Sep 22, 2011 16:34:57 MDT	Sep 22, 2011 16:51:51 MDT	
69.171.166.17	3	Sep 18, 2011 16:07:25 MDT	Sep 18, 2011 16:23:16 MDT	
69.171.166.120	1	Sep 3, 2011 20:16:05 MDT	Sep 3, 2011 20:16:05 MDT	
69.171.166.183	1	Aug 30, 2011 14:57:45 MDT	Aug 30, 2011 14:57:45 MDT	
69.171.166.146	1	Aug 26, 2011 16:36:27 MDT	Aug 26, 2011 16:36:27 MDT	
69.171.166.124	1	Aug 9, 2011 08:13:50 MDT	Aug 9, 2011 08:13:50 MDT	
69.171.166.135	2	Aug 4, 2011 11:03:12 MDT	Aug 4, 2011 13:24:42 MDT	
69.171.166.181	1	Jul 19, 2011 17:10:46 MDT	Jul 19, 2011 17:10:46 MDT	
69.171.166.215	1	Jul 14, 2011 06:17:27 MDT	Jul 14, 2011 06:17:27 MDT	
69.171.166.99	1	Jul 5, 2011 20:33:27 MDT	Jul 5, 2011 20:33:27 MDT	
69.171.166.169	1	Jun 25, 2011 13:08:12 MDT	Jun 25, 2011 13:08:12 MDT	
69.171.166.64	1	Jun 13, 2011 21:28:24 MDT	Jun 13, 2011 21:28:24 MDT	
69.171.166.178	1	Jun 6, 2011 12:11:50 MDT	Jun 6, 2011 12:11:50 MDT	
69.171.166.22	1	May 31, 2011 21:48:00 MDT	May 31, 2011 21:48:00 MDT	
69.171.166.242	1	May 13, 2011 06:40:53 MDT	May 13, 2011 06:40:53 MDT	
69.171.166.75	1	May 10, 2011 08:18:52 MDT	May 10, 2011 08:18:52 MDT	
69.171.166.115	1	May 3, 2011 21:13:10 MDT	May 3, 2011 21:13:10 MDT	
69.171.166.2	1	Apr 25, 2011 07:51:51 MDT	Apr 25, 2011 07:51:51 MDT	
69.171.166.153	1	Apr 19, 2011 17:41:44 MDT	Apr 19, 2011 17:41:44 MDT	
69.171.166.100	1	Mar 19, 2011 09:54:01 MDT	Mar 19, 2011 09:54:01 MDT	
69.171.166.202	1	Feb 6, 2011 21:54:23 MST	Feb 6, 2011 21:54:23 MST	

69.171.166.27	1	Feb 2, 2011 17:08:33 MST	Feb 2, 2011 17:08:33 MST
67.9.155.11	15	Nov 16, 2010 10:02:11 MST	Jan 25, 2011 12:33:58 MST
69.171.178.13	1	Dec 25, 2010 18:01:39 MST	Dec 25, 2010 18:01:39 MST
99.49.35.56	22	Dec 18, 2010 13:17:24 MST	Dec 24, 2010 11:34:25 MST
99.49.32.1	2	Dec 16, 2010 10:39:28 MST	Dec 17, 2010 15:30:52 MST
70.244.202.200	1	Dec 13, 2010 09:09:52 MST	Dec 13, 2010 09:09:52 MST
99.49.38.35	4	Dec 8, 2010 09:24:01 MST	Dec 10, 2010 11:56:25 MST
70.243.119.45	1	Dec 3, 2010 15:53:28 MST	Dec 3, 2010 15:53:28 MST
70.244.202.81	4	Dec 3, 2010 14:28:27 MST	Dec 3, 2010 14:54:07 MST
70.243.119.31	1	Dec 3, 2010 09:39:50 MST	Dec 3, 2010 09:39:50 MST
70.244.201.207	1	Dec 2, 2010 16:14:11 MST	Dec 2, 2010 16:14:11 MST
99.49.33.228	1	Nov 29, 2010 09:33:14 MST	Nov 29, 2010 09:33:14 MST
69.148.171.225	1	Nov 17, 2010 14:35:26 MST	Nov 17, 2010 14:35:26 MST
173.172.105.164	6	Sep 26, 2010 20:34:12 MDT	Nov 16, 2010 20:20:13 MST
67.9.134.211	1	Sep 27, 2010 10:34:21 MDT	Sep 27, 2010 10:34:21 MDT
72.177.54.209	1	Sep 9, 2010 19:26:41 MDT	Sep 9, 2010 19:26:41 MDT
173.172.96.245	16	Nov 21, 2009 14:56:17 MST	Dec 31, 2009 17:47:20 MST
216.16.194.58	1	Dec 16, 2009 11:30:25 MST	Dec 16, 2009 11:30:25 MST
66.68.50.65	1	Dec 4, 2009 12:28:52 MST	Dec 4, 2009 12:28:52 MST
99.184.86.33	1	Dec 1, 2009 11:59:35 MST	Dec 1, 2009 11:59:35 MST
66.25.170.51	1	Nov 21, 2009 16:47:28 MST	Nov 21, 2009 16:47:28 MST
70.116.81.113	18	Nov 13, 2008 19:15:52 MST	Dec 26, 2008 11:12:18 MST
70.253.78.227	1	Dec 20, 2008 14:24:40 MST	Dec 20, 2008 14:24:40 MST
70.253.78.31	1	Dec 19, 2008 15:10:42 MST	Dec 19, 2008 15:10:42 MST
70.253.83.175	1	Dec 18, 2008 14:38:54 MST	Dec 18, 2008 14:38:54 MST
70.253.86.47	1	Dec 17, 2008 17:22:06 MST	Dec 17, 2008 17:22:06 MST
70.253.88.168	2	Dec 16, 2008 15:20:10 MST	Dec 16, 2008 15:32:56 MST
70.253.70.129	4	Dec 13, 2008 10:54:50 MST	Dec 13, 2008 14:32:23 MST
72.179.2.82	1	Dec 6, 2008 10:39:12 MST	Dec 6, 2008 10:39:12 MST
24.153.219.100	8	Oct 10, 2007 07:40:06 MDT	Dec 29, 2007 14:31:58 MST
24.153.196.195	1	Dec 17, 2007 18:23:40 MST	Dec 17, 2007 18:23:40 MST
71.42.139.248	1	Jun 5, 2007 08:12:59 MDT	Jun 5, 2007 08:12:59 MDT
24.153.205.68	1	Mar 5, 2007 13:26:24 MST	Mar 5, 2007 13:26:24 MST
24.173.97.126	13	Oct 15, 2006 12:52:38 MDT	Dec 25, 2006 16:38:22 MST
24.153.214.144	2	Dec 20, 2006 21:27:46 MST	Dec 21, 2006 17:08:13 MST
70.112.254.107	8	Dec 21, 2005 10:29:27 MST	Dec 8, 2006 19:14:18 MST
204.64.22.216	1	Dec 7, 2006 18:00:04 MST	Dec 7, 2006 18:00:04 MST
67.79.216.67	1	May 21, 2006 13:14:59 MDT	May 21, 2006 13:14:59 MDT
24.227.155.13	27	Nov 30, 2004 17:55:48 MST	Jan 2, 2006 17:47:07 MST
67.79.223.115	10	Dec 19, 2005 13:48:25 MST	Dec 23, 2005 15:42:38 MST
204.64.23.236	10	Nov 9, 2004 14:40:52 MST	Dec 22, 2005 11:49:03 MST
70.113.107.37 (Signup)	13	Nov 4, 2004 22:48:05 MST	Jan 22, 2005 13:36:54 MST
24.173.102.75	6	Dec 21, 2004 17:26:17 MST	Dec 23, 2004 11:17:09 MST

IP Protection	Disabled
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Restrictions

Restriction	Attack Case ID	Time Restricted	Time Lifted
No restrictions on this account.			

Banks

Type	Status	Confirmed	Bank Name	Name	Routing #	Bank Acct #
Checking	Inactive	Confirmed (rand dep)	University Federal Credit Union	Christmas Bureau of Austin & Travis County	██████████	██████████

Savings	Active	Unconfirmed (Yodlee max logins)	UNIVERSITY FEDERAL CREDIT UNION	Christmas Bureau of Austin & Travis County	[REDACTED]	[REDACTED]
Savings	Inactive	Unconfirmed (rand dep not yet sent)	UNIVERSITY FEDERAL CREDIT UNION	Christmas Bureau of Austin & Travis County	[REDACTED]	[REDACTED]
Savings	Active - Primary	Confirmed (rand dep)	UNIVERSITY FEDERAL CREDIT UNION	Christmas Bureau of Austin & Travis County	[REDACTED]	[REDACTED]

Credit cards

Type	Status	Confirmed	Name	CC Number	Exp.	Currency	Issuer
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No Credit cards on file

Debit cards

Type	DC Number	Status	Req Date	Act Date	Exp Date	ATM Limit	POS Limit
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1-Physical Bus/Prem Started

Secure Card Attributes

Billing Address:	
Secure Card Numbers:	N/A [View all card numbers]
Backup Funding Source:	N/A
Daily Spending Limit	\$500

PayPal Credit

PayPal Credit Account Details

PayPal Credit Account Number:	
Expiration Date:	
Account Status:	[View History]
Funding Source Availability:	Disabled
Authorized Users:	Not Available

Auctions

Auction User ID	Auction Manager User ID
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No Auctions on file

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Mobile payments

Phone Number	Status	Pending Payment	Notification Preferences	Date Added	Signup Method
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No Mobile payments on file

The information is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this information in error, please contact the sender or delete the material from any computer.



CHRISTMAS
11-25-20
BLUE SANTA

EXHIBIT
E3

tabbles

CHRISTMAS BUREAU

HAS MOVED

PLEASE CALL:

BLUE SANTA