



United States Department of Justice

United States Attorney's Office

Western District of Texas – San Antonio Division

Justin R. Simmons

Assistant United States Attorney

601 NW Loop 410 Suite 600
San Antonio, Texas 78216

Phone: (210) 384-7100

April 5, 2023

Texas Comptroller of Public Accounts
Attn: Custodian of Records
208 E. 10th Street, Room 206
Austin, TX 78701

RE: Grand Jury Subpoena

Dear Madam/Sir:

You or your related entity have been served with a Grand Jury subpoena requesting records pertaining to an ongoing federal criminal investigation.

The custodian of the records, or other authorized individual, is authorized to comply with this subpoena by providing the records which are the subject of this grand jury subpoena as directed pursuant to the attached Guidelines for Electronic Documents, Audio, and Video, together with the completed and signed Certificate of Authenticity.

Because these are records sought by subpoena in connection with a criminal investigation, any disclosure of the existence of this subpoena or the nature of the records requested may jeopardize the on-going federal criminal investigation, including the safety of witnesses and investigators involved in the matter. As such, the U.S. Attorney's Office requests you keep these matters confidential.

Thank you in advance for your cooperation and full compliance in this matter.

Sincerely,

JAIME ESPARZA
UNITED STATES ATTORNEY

By: /s/
JUSTIN R. SIMMONS
Assistant United States Attorney

Enclosures:

Grand Jury Subpoena

Certificate of Authenticity

Guidelines for Electronic Documents, Audio, and Video

Subpoena # 2022R00463-0035

UNITED STATES DISTRICT COURT
for the
Western District of Texas

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Texas Comptroller of Public Accounts
Attn: Custodian of Records
208 E. 10th Street, Room 206
Austin, TX 78701

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: United States District Court United States Federal Courthouse 262 W. Nueva St. San Antonio, Texas 78207	Date and Time: May 3, 2023 8:30 A.M.
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You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):
SEE ATTACHMENT.

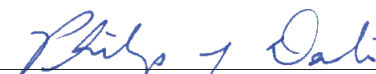
In lieu of personal appearance before Grand Jury, you may comply with this subpoena by providing the requested documents to **TAMMIE LERMA, GRAND JURY COORDINATOR, UNITED STATES ATTORNEY'S OFFICE, 601 NW LOOP 410, SUITE 600, SAN ANTONIO, TEXAS 78216; USATXW.GJRECORDS@USDOJ.GOV.**

If you have any questions, please contact Special Agent Luis Reyna, Internal Revenue Service-Criminal Investigation Division at 210-499-2937 or Luis.reyna@ci.irs.gov.

NOTE: BECAUSE UNTIMELY DISCLOSURE OF THIS SUBPOENA WOULD BE LIKELY TO INTERFERE WITH AN INVESTIGATION, PLEASE DO NOT DISCLOSE THIS SUBPOENA TO ANYONE.

Date: April 5, 2023




CLERK OF COURT

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

JUSTIN R. SIMMONS, ASSISTANT UNITED STATES ATTORNEY
UNITED STATES ATTORNEY'S OFFICE, WESTERN DISTRICT OF TEXAS
601 NW LOOP 410, SUITE 600
SAN ANTONIO, TEXAS 78216
(210) 384-7100

 Digitally signed by
JUSTIN SIMMONS
Date: 2023.04.06
18:20:02 -05'00'

Subpoena # 2022R00463-0035

PROOF OF SERVICE

This subpoena for *(name of individual or organization)* _____
was received by me on *(date)* _____ .

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because: _____

_____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Subpoena # 2022R00463-0035

ATTACHMENT TO SUBPOENA ISSUED TO:

Texas Comptroller of Public Accounts
Criminal Investigation Division
Attn: Cindy Chapa
208 E. 10th Street, Room 206
Austin, TX 78701

ALL OPEN AND CLOSED ACCOUNTS

For the timeframe: January 1, 2018 to present

All records pertaining to the following individuals and business entities whether held jointly or severally or as trustee or fiduciary as well as custodian, executor or guardian as well as any other entities in which these individuals or entities may have a financial interest:

Rosechachara Inc
EIN: 832118604
817 Willow St
Laredo, TX 78040

Rossy's Used Clothing Inc.
EIN: 271569095
817 Willow St
Laredo, TX 78040

CCF Tactical LLC
EIN: 832013093
817 Willow St
Laredo, TX 78040

RSMC Investments, LLC
817 Willow St
Laredo, TX 78040

RMM Rentals, LLC
817 Willow St
Laredo, TX 78040

These records should include but are not limited to:

Any and all records, electronic correspondence, and other documents.

RECORD FORMAT: Records are requested in the form of electronic media.

IN LIEU OF PERSONAL APPEARANCE BEFORE GRAND JURY, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS TO TAMMIE LERMA, GRAND JURY COORDINATOR, UNITED STATES ATTORNEY'S OFFICE, 601 NW LOOP 410, SUITE 600, SAN ANTONIO, TEXAS 78216; USATXW.GJRECORDS@USDOJ.GOV.

If you have any questions, please contact IRS Special Agent Luis Reyna at luis.reyna@ci.irs.gov or 210-499-2937.

CERTIFICATE OF AUTHENTICITY OF DOMESTIC
RECORDS PURSUANT TO FEDERAL RULES OF
EVIDENCE 902(11) AND 902(13)

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by _____[**PROVIDER**], and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of _____[**PROVIDER**]. The attached records consist of _____ [**GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)**]. I further state that:

a. All records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted activity of _____[**PROVIDER**], and they were made by _____ [**PROVIDER**] as a regular practice; and

b. Such records were generated by _____[**PROVIDER'S**] electronic process or system that produces an accurate result, to wit:

1. The records were copied from electronic device(s), storage medium(s), or file(s) in the custody of _____[**PROVIDER**] in a manner to ensure that they are true duplicates of the original records; and

2. The process or system is regularly verified by _____ [**PROVIDER**], and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

Date

Signature

GUIDELINES FOR ELECTRONIC DOCUMENTS, AUDIO, AND VIDEO

You are providing items that will be electronically organized with other documents and files. To facilitate this process, and make the information you provide useful, it is important that the information be provided in **standard electronic format**.

PREFERRED FORMAT FOR ELECTRONIC DOCUMENTS

- We strongly discourage you from providing the documents in proprietary formats that require the use of specialized software to decrypt, view, or export the documents into useable formats. If you must use this format see the guidelines below.
- Documents should be provided in native format (see table below.)
- If native format is not available or is not in the table below as a preferred format, then provide documents in PDF or multi-page TIF format.
 - One PDF or TIF file per document.
 - No embedded files within PDF files.
 - Printing and editing of PDF files must not be restricted.
 - No proprietary viewers.
 - Encryption, if used, should be in WinZip, True Crypt, or PDF format.

Type of Document	Preferred Format	Acceptable Format
Word Processor	DOC, DOCX, WPD, TXT	TXT, RTF, PDF, Multipage TIF
Spreadsheet	XLS, XLSX, CSV	
Email	PST, EML, MSG	
Database	PDF, TIF, JPG	
Pictures	JPG, PNG, TIFF, PDF	

PREFERRED FORMAT FOR AUDIO AND VIDEO FILES

- Do not provide audio or video in proprietary format that requires the use of specialized software to view or export the audio or video into useable formats.

Type of Document	Preferred Format	Acceptable Format
Audio	WAV, MP3	CDA(CD Audio Format)
Video	AVI, WMV, MPG	DVD Movie Format (AUDIO_TS and/or VIDEO_TS folders)

PROPRIETARY SOFTWARE FOR VIEWING DOCUMENTS, AUDIO, OR VIDEO FILES (if you must)

- **Do not** provide any items in any proprietary format that requires **the installation of software** on our computers.
- Standalone viewers that can run **without being installed** are acceptable **only if they provide an easy method for exporting the items into the standard electronic formats** indicated above. We prefer not to use the viewers as it takes substantially more time to review these documents.

IF YOU CANNOT MEET THESE REQUIREMENTS, OR YOU HAVE QUESTIONS

Please contact the Requesting AUSA if you have questions or if there is a compelling reason why the electronic records cannot be provided in one of these formats.