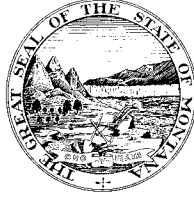


**ATTORNEY GENERAL**  
STATE OF MONTANA

Steve Bullock  
Attorney General



Department of Justice  
215 North Sanders  
PO Box 201401  
Helena, MT 59620-1401

**STATE OF MONTANA**  
**CIVIL INVESTIGATIVE DEMAND**

TO: American Police Force  
ATTENTION: Becky Shay  
American Police Force  
406 N. Cheyenne Ave.  
Hardin, MT 59034

BY AUTHORITY OF THE STATE OF MONTANA, including pursuant to the Montana Unfair Trade Practices and Consumer Protection Act (MUTCPA), Mont. Code Ann. § 30-14-113, **American Police Force** (Respondent) is hereby **COMMANDED** to present to the Montana Department of Justice, **under oath**, by delivering to the Montana Attorney General's Office, 215 North Sanders, P.O. Box 201401, Helena, MT 59620, on or before the **12th** day of **October, 2009**, the information specified below. The information is requested in connection with an investigation into the Respondent's activities involving its business practices within Montana, which may constitute unfair or deceptive acts or practices in violation of the provisions of MUTCPA. The Respondent is notified not to destroy, discard, alter in any manner or transfer from its possession, any documentary material identified in any and all of the Respondent's responses to the information requested. In addition, please be aware that information submitted may be shared with other states' regulatory authorities.

The RELEVANT TIME PERIOD for which documents and information are requested is October 1, 2006 through the present, unless otherwise specified. You have an ongoing obligation to supplement your responses to interrogatories and production of documents.

As used here, YOU and YOUR refers to American Police Force, any person or agent acting on its behalf, and parent or subsidiary corporations. The terms PERSON or INDIVIDUAL includes natural persons, corporations, firms, associations, partnerships, joint ventures, any form of business entity, and governmental agencies, departments, units, or subdivisions thereof.

The requests for production call for all described documents in your possession, custody, or control without regard to the persons or person by whom or for whom the documents were prepared. A document is within your CONTROL if you have ownership, possession, or custody of the document, or the right to secure the document or a copy thereof from any person having physical control of the document.

DOCUMENT and/or DOCUMENTS is used in the broadest sense and means all written, printed, typed, recorded, or graphic matter, photographic matter, sound reproductions, computer files, including but not limited to

electronic mail, tapes, inputs or outputs, however produced or reproduced or in any other matter from which information may be obtained, and drafts, non-identical copies, file folders, and jackets in which the documents are contained. The phrase "non-identical copies" refers to reproductions of the original documents that have notations, marking, comments, or other materials not appearing in the original.

The terms RELATING TO, RELATED TO, and RELATE TO mean to be relevant in any way to the subject matter in question including, without limitation, all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, indicates, comments upon, or discusses the subject matter. The terms also include documents or information that states the background of, was the basis for, records, evaluates, comments upon, or was referred to, relied upon, utilized, generated, transmitted, or received in arriving at any conclusion, opinion, estimate, position, decision, belief, or assertion concerning the subject matter.

The term IDENTIFY, when used with respect to a person or entity, means information sufficient to ascertain the name, address, telephone number, and, if not a natural person, the contact person of the entity or

facility to be identified, as well as the relationship of that person or entity to you. The term IDENTIFY, when used with respect to a fact or event, means information sufficient to ascertain the fact or event with reasonable particularity, and to identify each person believed to have knowledge of the fact or event and each document that relates to the fact or event.

The term CONTRACT means any contract, understanding, or arrangement, whether oral or written, including all attachments, addenda, modifications, amendments, memoranda of understanding and modifications thereto.

The terms EMPLOY, EMPLOYED, and EMPLOYEE(S) relate to any and all individuals whom you control or direct the means and methods of accomplishing the result of the individual's work, regardless of whether or not the individual is employed full-time or part-time, is paid a salary or on commission, or is called an employee, agent, or independent contractor.

The term YOUR WEBSITE refers to the internet website at [www.americanpolicegroup.com](http://www.americanpolicegroup.com).

## INFORMATION AND DOCUMENT REQUESTS

1. You represent on your website that “American Police Force is dedicated to maintaining our *well deserved professional reputation . . . .*” (emphasis added). With respect to this representation, identify the names of at least 10 entities or individuals for whom American Police Force has provided services within the last 3 years.

2. You further represent on your website that “. . . we service all 50 States and most Countries.” With respect to this representation:

a. Identify each State in which American Police Force has provided services at any time;

b. Describe the nature of the services that American Police Force provided in each State identified;

c. Identify each state in which American Police Force is registered or licensed to conduct business.

3. You further represent on your website that “Our experienced staff consists of highly experienced former law enforcement officers.” With respect to this representation:

- a. Identify each person that is, or since October 1, 2006, has been, a member of the American Police Force staff; and
  - b. For each person identified in 3(a), describe their law enforcement experience and qualifications.
  - c. Of the staff identified in (a) produce copies of all licenses for each person, including but not limited to professional licenses granted by the Montana Department of Labor and Industry under Montana Code Annotated, title 30, chapter 60, and licenses granted by any other state or state agency.
4. You further represent on your website that “. . . APF plays a critical role in helping the U.S. government meet vital homeland security and national defense needs. Within the last 5 years the United States has been far and away our #1 client.” With respect to these representations:
  - a. Identify the agencies within the U.S. government for which American Police force has provided services in the last 5 years;
  - b. Identify the person or persons in the U.S. Government who can verify that American Police Force has provided services for the U.S. Government.
5. Identify the address of your “main office” in Washington, D.C., as referred to on your website.

6. Provide copies of all corporate formation documents, including but not limited to Articles of Incorporation and By-Laws.

7. Identify your current and former owners, officers, and directors during the relevant time period.

8. Produce a list of all individuals currently employed by you.

9. Produce all documents concerning, reflecting or constituting any agreement or transaction between Two Rivers Authority and you.

10. Produce all prospectuses, brochures, pamphlets, solicitations, advertising, marketing materials, or other document or documents you have provided to Two Rivers Authority and/or any person affiliated with or acting on behalf of Two Rivers Authority.

11. Produce all contracts, agreements, memoranda of understanding, letters of intent, or any similar documents relating to any agreement or potential agreement between American Police Force and any other entity with respect to the performance by American Police Force of its proposed operating agreement with Two Rivers Authority. This includes but is not limited to any such documents relating to the prisoners or inmates to be housed at the Two Rivers Regional Detention Facility and/or any entity for which you will provide housing, training or any other service on any property owned by Two Rivers.

12. Provide copies of all state and federal tax returns prepared or filed by you or for American Police Force since January 1, 2007.

13. Have you been named as a party in any litigation or court proceeding? If so:

a. Identify the litigation or the nature of the court proceeding and produce a copy of the most recently filed complaint or amended complaint.

b. If the litigation or court proceeding is ongoing, so indicate.

c. If the litigation or court proceeding has concluded, describe the outcome of the litigation or proceeding and produce a copy of any assurances of voluntary compliance, assurances of discontinuance, consent decrees, settlement agreements, court orders, or any similar documents demonstrating the resolution of the litigation or court proceeding.

14. Produce copies of any correspondence between you and any government agency related to allegations that a solicitation or representation was false, misleading, or deceptive.

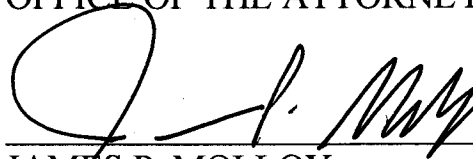
15. Produce copies of all documents used or referred to in connection with responding to any of the above requests for information that



are not otherwise provided in response to the specific document requests  
above.

ISSUED this 1<sup>st</sup> day of October, 2009.

STATE OF MONTANA  
OFFICE OF THE ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "J. P. Molloy", is written over a horizontal line.

JAMES P. MOLLOY  
Assistant Attorney General  
Senior Consumer Attorney  
215 North Sanders  
P.O. Box 201401  
Helena, MT 59620-1401

