

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE STATE OF ALABAMA,
501 Washington Avenue
Montgomery, AL 36130

THE STATE OF ALASKA,
1031 W. 4th Avenue, Ste. 200
Anchorage, AK 99501

THE STATE OF ARIZONA,
2005 N. Central Ave.
Phoenix, AZ 85004

THE STATE OF ARKANSAS,
323 Center Street, Suite 200
Little Rock, AR 72201

THE PEOPLE OF THE STATE OF
CALIFORNIA,
300 South Spring Street, Suite 1702
Los Angeles, CA 90013

THE STATE OF COLORADO,
Ralph L. Carr Colorado Judicial Center
1300 Broadway, 6th Floor
Denver, CO 80203

THE STATE OF CONNECTICUT,
165 Capitol Avenue
Hartford, CT 06106

THE STATE OF DELAWARE,
820 N. French Street, 5th Floor
Wilmington, DE 19801

THE STATE OF FLORIDA,
3507 E. Frontage Road
Suite 325
Tampa, FL 33607

THE STATE OF GEORGIA,
40 Capitol Square, S.W.
Atlanta, GA 30334

THE STATE OF HAWAII,)
425 Queen Street)
Honolulu, HI 96813)

THE STATE OF IDAHO,)
700 W. Jefferson St.)
PO Box 83720)
Boise, ID 83720-0010)

THE STATE OF ILLINOIS,)
500 South Second Street)
Springfield, IL 62706)

THE STATE OF INDIANA,)
302 West Washington St., IGCS 5th Fl.)
Indianapolis, IN 46204)

THE STATE OF IOWA,)
1305 E. Walnut St.)
Des Moines, IA 50319)

THE STATE OF KANSAS,)
ex rel. Attorney General Derek Schmidt)
120 SW 10th Avenue, 2nd Floor)
Topeka, KS 66612)

THE COMMONWEALTH OF KENTUCKY,)
State Capitol, Suite 118)
700 Capital Avenue)
Frankfort, KY 40601-3449)

THE STATE OF LOUISIANA,)
1885 N. Third Street)
Baton Rouge, LA 70802)

THE STATE OF MAINE,)
Burton Cross Office Building, 6th Floor)
111 Sewall Street)
Augusta, ME 04330)

THE STATE OF MARYLAND,)
200 Saint Paul Place)
Baltimore, MD 21202)

THE COMMONWEALTH OF)
MASSACHUSETTS,)
One Ashburton Place)
Boston, MA 02108)

THE STATE OF MICHIGAN,)
525 W. Ottawa Street, 5th Floor)
PO Box 30736)
Lansing, MI 48909)

THE STATE OF MINNESOTA,)
445 Minnesota Street, Suite 1200)
St. Paul, MN 55101-2130)

THE STATE OF MISSISSIPPI,)
PO Box 220)
Jackson, MS 39205)

THE STATE OF MISSOURI,)
PO Box 899)
Jefferson City, MO 65102)

THE STATE OF MONTANA,)
215 N. Sanders)
Helena MT 59624)

THE STATE OF NEBRASKA,)
2115 State Capitol)
Lincoln, NE 68509-8920)

THE STATE OF NEVADA,)
100 North Carson Street)
Carson City, NV 89701)

THE STATE OF NEW HAMPSHIRE,)
33 Capitol Street)
Concord, NH 03301)

THE STATE OF NEW JERSEY,)
124 Halsey Street – 5th Floor)
PO Box 45029)
Newark, NJ 07101)

THE STATE OF NEW MEXICO,)
PO Drawer 1508)
Santa Fe, NM 87504-1508)
)
THE STATE OF NEW YORK,)
28 Liberty Street)
New York, NY 10005)
)
THE STATE OF NORTH CAROLINA,)
PO Box 629)
Raleigh, NC 27602)
)
THE STATE OF NORTH DAKOTA,)
Gateway Professional Center)
1050 E Interstate Ave, Ste. 200)
Bismarck, ND 58503-5574)
)
THE STATE OF OHIO,)
30 E. Broad St., 14th Floor)
Columbus, OH 43215)
)
THE STATE OF OKLAHOMA)
313 N.E. 21st Street)
Oklahoma City, OK 73105)
)
THE STATE OF OREGON,)
1162 Court Street NE)
Salem, OR 97301)
)
THE COMMONWEALTH OF PENNSYLVANIA,)
16th Floor, Strawberry Square)
Harrisburg, PA 17120)
)
THE STATE OF RHODE ISLAND,)
150 South Main Street)
Providence, RI 02903)
)
THE STATE OF SOUTH CAROLINA,)
1000 Assembly Street, Room 519)
Columbia, SC 29201)
)
THE STATE OF SOUTH DAKOTA,)
1302 E. Highway 14, Suite 1)
Pierre, SD 57501)

THE STATE OF TENNESSEE, *ex rel.*)
HERBERT H. SLATERY III,)
Attorney General and Reporter,)
425 Fifth Avenue North)
Nashville, TN 37243-3400)
)
THE STATE OF TEXAS,)
401 E. Franklin Avenue, Suite 530)
El Paso, TX 79901)
)
THE STATE OF UTAH,)
350 North State Street, #230)
Salt Lake City, UT 84114-2320)
)
THE STATE OF VERMONT,)
109 State Street)
Montpelier, VT 05609)
)
THE COMMONWEALTH OF VIRGINIA,)
202 North 9th Street)
Richmond, VA 23219)
)
THE STATE OF WASHINGTON,)
800 Fifth Avenue, Suite 2000)
Seattle, WA 98104)
)
THE STATE OF WEST VIRGINIA,)
PO Box 1789)
Charleston, WV 25326)
)
THE STATE OF WISCONSIN,)
Post Office Box 7857)
Madison, WI 53707-7857)
)
THE STATE OF WYOMING,)
Kendrick Building)
2320 Capitol Avenue)
Cheyenne, WY 82002)
)
and)
)
THE DISTRICT OF COLUMBIA,)
400 6th Street, N.W., 10th Floor)
Washington, DC 20001)
)
Plaintiffs,)

v.)
)
)
 NATIONSTAR MORTGAGE LLC,)
 D/B/A MR. COOPER,)
 8950 Cypress Waters Boulevard)
 Coppell, TX 75019)
)
 Defendant.)
)
)
 _____)

COMPLAINT

Now come the States of Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Washington, West Virginia, Wisconsin, Wyoming, the Commonwealths of Kentucky, Massachusetts, Pennsylvania, and Virginia, and the District of Columbia (collectively, “Plaintiff States” or “Attorneys General”) by and through their undersigned attorneys, and respectfully allege as follows:

INTRODUCTION

1. This is a civil action filed jointly by the Attorneys General against Nationstar Mortgage LLC, d/b/a Mr. Cooper (“Defendant” or “Nationstar”) for alleged misconduct related to its servicing of single-family residential mortgages.

2. As described in the allegations below, Defendant’s conduct during the servicing of borrowers’ mortgage loans constituted unfair or deceptive acts and practices by Defendant and its vendors and resulted in violations of homeowners’ rights and protections.

3. Pursuant to 12 U.S.C. § 5552(b)(1), the Attorneys General have performed all conditions precedent to the filing of this action.

THE PARTIES

4. This action is brought by the Attorneys General pursuant to 12 U.S.C. § 5552(a)(1) of the Consumer Financial Protection Act of 2010 (the “CFPA”). The Attorneys General are authorized to bring this action and to enforce 12 U.S.C. §§ 5531 and 5536(a), which prohibit unfair, deceptive, or abusive acts or practices, or other violations of Federal consumer financial law, by any covered person or service provider. The Attorneys General are also authorized to bring this action pursuant to consumer protection enforcement authority conferred on them by state law and pursuant to *parens patriae* and common law authority. The Attorneys General are authorized to seek injunctive relief, restitution for consumers, and other monetary relief for violations of the consumer protection laws of their States and the CFPA.

5. Defendant is a privately held wholly owned subsidiary of Mr. Cooper Group, Inc. that services residential mortgage loans. It has its principal place of business in Coppell, Texas. Nationstar transacts or has transacted business in this District and throughout the United States.

JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction over this action because it is “brought under Federal consumer financial law,” 12 U.S.C. § 5565(a)(1), presents a federal question, 28 U.S.C. § 1331, and is brought by the Attorneys General pursuant to their authority under 12 U.S.C. § 5552(a)(1). *See The State of Alabama, et al., v. PHH Mortgage Corporation*, No. 1:18-cv-00009-TFH (D.D.C. May 10, 2018).

7. In addition, pursuant to 28 U.S.C. § 1367(a), this Court has supplemental jurisdiction over the subject matter of the state unfair and deceptive acts and practices claims

asserted by the Attorneys General because those claims are so related to the claims brought under federal consumer financial law that they form part of the same case or controversy, and because those claims arise out of the same transactions or occurrences as the claims brought by the Attorneys General pursuant to 12 U.S.C. §§ 5531, 5536(a), and 5552(a)(1).

8. Venue is proper in this District under 28 U.S.C. § 1391(b) and 12 U.S.C. § 5564(f).

THE MORTGAGE SERVICING INDUSTRY

9. The single-family mortgage servicing industry consists of financial services and other firms that service mortgages for residential properties designed to house one-to-four family dwellings.

10. For more than thirty years, mortgages typically have been “pooled” to create an investment vehicle, often denominated as a trust, and interests in the trusts have been sold to investors that own interests in payment streams generated by principal and interest payments by the borrowers.

11. A “servicer” is responsible for mortgage administration activities, known as servicing activities, which generally include collecting payments from mortgagors; applying payments made in an agreed-upon order to the mortgagor’s indebtedness; distributing payments after allowable deductions to the investment trust entities for distribution to investors; making advances to cover delinquent mortgage payments and other costs, such as the costs of protecting and maintaining properties that collateralize mortgage loans when mortgagors fail to do so; pursuing collections from delinquent mortgagors; and pursuing either loss mitigation or foreclosure, as appropriate, to minimize the loss to investors and others when mortgagors become delinquent on mortgage payments.

12. A servicer who does not originate a mortgage loan may become the servicer by purchasing the “mortgage servicing rights” or by entering into a contract with the “master servicer” to act on its behalf as “subservicer.” Inbound and outbound transfers of mortgage loans from one servicer to another are common in the mortgage servicing industry, and such transfers can occur at various stages of repayment of the mortgage, including where the borrower is delinquent in payments and may seek loss mitigation assistance from the servicer to avoid foreclosure on the loan.

13. As part of the foreclosure management and property preservation processes, servicers frequently retain third party vendors to inspect properties owned by delinquent borrowers to determine whether borrowers are living in their homes. If a property is deemed vacant, servicers are responsible for securing the property by changing locks and maintaining the property to avoid disrepair.

NATIONSTAR’S MORTGAGE SERVICING MISCONDUCT

14. Nationstar services and subservices home mortgage loans secured by residential properties owned by individual citizens of each of the Plaintiff States and of the United States.

15. Nationstar is a “covered person” engaged “in offering or providing a consumer financial product or service,” as those terms are defined in the CFPA, and is subject to the CFPA’s prohibition on unfair, deceptive or abusive acts or practices. 12 U.S.C. §§ 5481(6), 5531, and 5536(a).

16. Nationstar is engaged in trade or commerce in each of the Plaintiff States and is subject to the consumer protection laws of the Plaintiff States in the conduct of its debt collection, mortgage servicing, loss mitigation, and foreclosure activities. The consumer

protection laws of the Plaintiff States include laws prohibiting unfair or deceptive acts or practices.

17. Nationstar personnel frequently interact with borrowers who are delinquent or are at risk of becoming delinquent on their mortgage loans, who have complaints or inquiries about their mortgage loans, or who require loss mitigation assistance.

18. Nationstar regularly reviews mortgage loans for potential loss mitigation or loan modification options, and conducts or manages foreclosures.

19. In the course of Nationstar's mortgage servicing activities, Nationstar engaged in the following unlawful acts and practices:

- a. failing to properly oversee third party vendors retained for servicing and foreclosure operations, including third party vendors responsible for changing locks during the property preservation process;
- b. failing to properly oversee and implement the inbound transfer of mortgage loans;
- c. failing to appropriately identify loans with pending loan modification applications (in-flight modifications) when a loan was being transferred to Nationstar for servicing;
- d. failing to timely and accurately apply payments made by certain borrowers;
- e. threatening foreclosure and conveying conflicting messages to certain borrowers engaged in loss mitigation;
- f. failing to properly process borrowers' applications for loan modifications;
- g. failing to properly review and respond to borrower complaints;

- h. failing to identify and communicate with successors in interest;
- i. failing to make timely escrow disbursements, including the failure to timely remit property tax payments;
- j. failing to properly maintain escrow accounts, including collecting escrow shortages from borrowers on a completed Chapter 13 bankruptcy plan that were not legally due;
- k. failing to timely terminate borrowers' private mortgage insurance; and
- l. collecting monthly modified payment amounts on certain loans where the amounts charged for principal and interest exceed the principal and interest amount contained in the trial plan agreement.

COUNT I

**VIOLATIONS OF STATE LAW PROHIBITING
UNFAIR AND DECEPTIVE CONSUMER PRACTICES
WITH RESPECT TO LOAN SERVICING**

- 20. The allegations in paragraphs 1 through 19 above are incorporated herein by reference.
- 21. Nationstar's loan servicing conduct, as described above, constitutes unfair or deceptive acts or practices in violation of the consumer protection laws of each Plaintiff State.
- 22. Nationstar's unlawful conduct has resulted in injury to consumers residing in the Plaintiff States whose mortgage loans were serviced by Nationstar. Harm was sustained by such citizens, and the Attorneys General have incurred substantial expenses in their investigations and attempts to obtain remedies for Nationstar's unlawful conduct.

COUNT II

**VIOLATIONS OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010
WITH RESPECT TO LOAN SERVICING**

23. The allegations in paragraphs 1 through 19 above are incorporated herein by reference.

24. Nationstar's loan servicing conduct, as described above, constitutes unfair or deceptive acts or practices in violation of 12 U.S.C. §§ 5531(a) and 5536(a).

PRAYER FOR RELIEF

WHEREFORE, the Attorneys General, pursuant to 12 U.S.C. §§ 5552(a)(1) and 5565 and their state consumer protection laws, respectfully request that judgment be entered in their favor and against Defendant for each violation charged in the Complaint, and request that the Court:

- A. Enjoin Defendant from committing future violations;
- B. Award such relief as the Court finds necessary to redress injury to consumers;
- C. Award such relief as the Court finds necessary to disgorge Defendant of unlawful gains;
- D. Award the Attorneys General the costs of bringing this action; and
- E. Award additional relief as the Court may determine to be just and proper.

Dated: December 7, 2020

Respectfully submitted,

For the State of Alabama:

/s/ Olivia Martin

OLIVIA MARTIN

Assistant Attorney General

Office of the Alabama Attorney General

501 Washington Avenue

Montgomery, AL 36130

Tel.: 334-242-7335

Fax: 334-242-2433

Olivia.Martin@AlabamaAG.gov

For the State of Alaska:

CLYDE "ED" SNIFFEN, JR.
Acting Attorney General

/s/ Ian Engelbeck
IAN R. ENGELBECK
Alaska Bar No. 2010094
Assistant Attorney General
Alaska Department of Law
1031 W. 4th Avenue, Ste. 200
Anchorage, AK 99501
Tel.: 907-269-5200
Fax: 907-276-3697
Ian.Engelbeck@alaska.gov

For the State of Arizona:

MARK BRNOVICH
Arizona Attorney General

/s/ Matthew du Mee
MATTHEW DU MEE
Consumer Litigation Unit Chief Counsel
2005 N. Central Ave.
Phoenix, AZ 85004-1592
Tel.: 602-542-5025
Fax: 602-542-4085
Matthew.duMee@azag.gov

For the State of Arkansas:

LESLIE RUTLEDGE
Attorney General

/s/ Johnathan R. Carter
JOHNATHAN R. CARTER
(Ark. Bar No. 2007105)
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
Tel.: 501.682.8063
Johnathan.Carter@arkansasag.gov

For the People of the State of California:

XAVIER BECERRA
Attorney General

/s/ Tina Charoenpong
TINA CHAROENPONG
Deputy Attorney General
Office of the Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Tel.: 213-269-6000
Fax: 213-897-4951
Tina.Charoenpong@doj.ca.gov

For the State of Colorado, *ex rel.*

PHILIP J. WEISER
Attorney General

/s/ Jennifer Miner Dethmers
JENNIFER MINER DETHMERS
Senior Assistant Attorney General
Jennifer.Dethmers@coag.gov

/s/Nikolai Frant
NIKOLAI FRANT
First Assistant Attorney General
Nikolai.frant@coag.gov

Colorado Department of Law
Consumer Protection Section
Ralph L. Carr Colorado Judicial Center
1300 Broadway, 6th Floor
Denver, CO 80203
Tel.: 720-508-6229
Fax: 720-508-6040

For the State of Connecticut:

WILLIAM TONG
Attorney General

/s/ Joseph Chambers
JOSEPH J. CHAMBERS
Assistant Attorney General
Finance Department Head
Connecticut Office of the Attorney General
165 Capitol Avenue,
Hartford, Connecticut 06106
Tel.: 860-808-5270
Joseph.Chambers@ct.gov

For the State of Delaware:

/s/ Michael Clarke

MICHAEL CLARKE

Deputy Attorney General

Delaware Department of Justice

820 N. French Street, 5th Floor

Wilmington, DE 19801

Tel.: 302-577-8308

Fax: 302-577-8426

Michael.Clarke@delaware.gov

For the District of Columbia:

KARL A. RACINE
Attorney General for the District of Columbia

/s/ Benjamin Wiseman
BENJAMIN WISEMAN, DC Bar # 1005442
Director, Office of Consumer Protection
Office of the Attorney General
400 6th Street, N.W., 10th Floor
Washington, DC 20001
Tel.: 202-741-5226
Fax: 202-741-8949
Benjamin.Wiseman@dc.gov

For the State of Florida:

ASHLEY MOODY
Attorney General

VICTORIA A. BUTLER
Director, Consumer Protection Division

/s/ Sasha Funk Granai
SASHA FUNK GRANAI
Deputy Director
Consumer Protection Division
Office of the Florida Attorney General
3507 E. Frontage Road, Suite 325
Tampa, FL 33607
Tel.: 813-287-7950
Fax: 813-281-5515
Sasha.FunkGranai@myfloridalegal.com

For the State of Georgia:

CHRISTOPHER M. CARR
Attorney General

/s/ Alkesh Patel
Alkesh Patel
Assistant Attorney General
Commercial Transactions & Litigation
Georgia Department of Law
40 Capitol Square SW
Atlanta, Georgia, 30334
Tel.: 404-458-3598
APatel@LAW.GA.GOV

For the State of Hawaii:

/s/ James C. Paige
JAMES C. PAIGE
Deputy Attorney General
Department of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813
Tel.: 808-586-1500
Fax: 808-586-1239
James.C.Paige@hawaii.gov

For the State of Idaho

LAWRENCE WASDEN
Attorney General:

/s/ Stephanie Guyon
STEPHANIE GUYON
Deputy Attorney General
Office of the Idaho Attorney General
954 W. Jefferson St., 2nd Fl.
PO Box 83720
Boise, ID 83720-0010
Tel.: 208-334-2424
Fax: 208-334-4151
Stephanie.guyon@ag.idaho.gov

For the State of Illinois:

KWAME RAOUL
Attorney General

/s/ Andrew Dougherty
ANDREW DOUGHERTY
Deputy Bureau Chief, Consumer Fraud
Illinois Attorney General's Office
100 W. Randolph, 12th Floor
Chicago, IL 60601
Tel.: 312-814-4982
Fax: 312-814-2593
adougherty@atg.state.il.us

For the State of Indiana:

/s/ Scott Barnhart

SCOTT BARNHART

Chief Counsel and Director of Consumer Protection

Office of the Indiana Attorney General

302 West Washington Street

IGCS – 5th Floor

Indianapolis, IN 46204

Tel.: 317-232-6309

Fax: 317-232-7979

Scott.Barnhart@atg.in.gov

For the State of Iowa:

TOM MILLER
Iowa Attorney General

/s/ Patrick Madigan
PATRICK MADIGAN
Assistant Attorney General
Office of the Attorney General of Iowa
Hoover State Office Building
1305 E. Walnut St.
Des Moines, IA 50319
Tel.: 515-281-5926
Patrick.Madigan@ag.iowa.gov

For the State of Kansas:

Attorney General DEREK SCHMIDT

/s/ Kathryn Carter

KATHRYN CARTER

Deputy Attorney General

Office of the Attorney General

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Tel.: 785-368-8407

Fax: 785-291-3699

Kate.Carter@ag.ks.gov

For the Office of the Attorney General of Kentucky:

DANIEL CAMERON
Attorney General

/s/ Don Rodgers

DON RODGERS

Assistant Attorney General
Commonwealth of Kentucky
State Capitol, Suite 118
700 Capital Avenue
Frankfort, Kentucky 40601-3449
Tel.: 502-696-5300
Fax: 502-564-2894
Don.Rodgers@ky.gov

For the State of Louisiana:

JEFF LANDRY
Attorney General

/s/ Arham Mughal
Arham Mughal, La. Bar Roll No. 38354
Assistant Attorney General
Public Protection Division
1885 North Third Street
Baton Rouge, Louisiana 70802
Tel.: 225-326-6439
Fax: 225-326 -6499
MughalA@ag.louisiana.gov

For the State of Maine:

AARON M. FREY
Attorney General

/s/ Linda Conti

LINDA CONTI

Assistant Attorney General
Office of the Maine Attorney General
Burton Cross Office Building, 6th Floor
111 Sewall Street
6 State House Station
Augusta, Maine 04330
Tel.: 207-626-8800
Fax: 207-624-7730
Linda.Conti@maine.gov

For the State of Maryland:

BRIAN E. FROSH
Attorney General

/s/ Shelly M. Martin
SHELLY M. MARTIN, DC Bar # 473462
Assistant Attorney General
Office of the Attorney General of Maryland
200 Saint Paul Place
Baltimore, MD 21202
Tel.: 410-576-6522
Fax: 410-576-6566
smartin@oag.state.md.us

For the Commonwealth of Massachusetts:

MAURA HEALEY
Attorney General

/s/ Michael Lecaroz
MICHAEL LECAROZ
Mass. BBO # 672397
Assistant Attorney General
Consumer Protection Division
One Ashburton Place
Boston, MA 02108
Tel.: 617-727-2200
Michael.Lecaroz@mass.gov

For the State of Michigan:

DANA NESSEL
Attorney General

/s/ Kathy Fitzgerald
KATHY FITZGERALD
MI Bar # 31454
Assistant Attorney General
525 W. Ottawa Street, 5th Floor
PO Box 30736
Lansing, MI 48909
Tel.: 517-335-7632
Fax: 517-335-6755
Fitzgeraldk@michigan.gov

For the State of Minnesota:

KEITH ELLISON
Attorney General

/s/ Caitlin Micko

CAITLIN MICKO

Assistant Attorney General
Minnesota Attorney General's Office
445 Minnesota Street, Suite 1200
St. Paul, MN 55101-2130
Tel.: 651-724-9180
Fax: 651-282-5832
Caitlin.Micko@ag.state.mn.us

For the State of Mississippi:

LYNN FITCH
Attorney General

/s/ Seth Shannon
SETH SHANNON
MS Bar #103466
Special Assistant Attorney General
PO Box 220
Jackson, MS 39205
Tel.: 769-237-6406
seth.shannon@ago.ms.gov

For the State of Missouri:

ERIC S. SCHMITT
Attorney General

/s/ Michael Schwalbert
MICHAEL SCHWALBERT
MO Bar #63229
Assistant Attorney General
815 Olive Street, Suite 200
Saint Louis, Missouri 63101
Phone: 314-340-7888
Fax: 314-340-7981
michael.schwalbert@ago.mo.gov

For the State of Montana:

TIMOTHY C. FOX
Attorney General

/s/ Chuck Munson
CHUCK MUNSON
Assistant Attorney General
Montana Department of Justice
215 N. Sanders
Helena MT 59624
Tel.: 406-444-2026
Fax: 406-444-3549
Cmunson@mt.gov

For the State of Nebraska:

DOUGLAS J. PETERSON,
Attorney General #18146

/s/ Jocelyn Brasher

JOCELYN J. BRASHER, #26011
Assistant Attorney General
Office of the Nebraska Attorney General
2115 State Capitol
Lincoln, NE 68509
Tel.: 402-471-1279
Jocelyn.Brasher@nebraska.gov

For the State of Nevada:

AARON D. FORD
Attorney General
Bureau of Consumer Protection

/s/ Sheri Ann Forbes
SHERI ANN FORBES
Senior Deputy Attorney General
Nevada Bar No. 7337
555 E. Washington Avenue, Ste. 3900
Las Vegas, Nevada 89101
Tel.: 702-486-3085
Fax: 775-684-1299
SForbes@ag.nv.gov

For the State of New Hampshire:

/s/ Robert F. Adams

ROBERT F. ADAMS

DC Bar # 259515 (inactive status)

Assistant Attorney General

Consumer Protection & Antitrust Bureau

New Hampshire Department of Justice

33 Capitol Street

Concord, New Hampshire 03301

Tel.: 603-271-2678

Fax: 603-271-2110

Robert.F.Adams@doj.nh.gov

For the State of New Jersey:

GURBIR S. GREWAL
Attorney General of New Jersey

/s/ Donna J. Dorgan
DONNA J. DORGAN
Deputy Attorney General
Consumer Fraud Prosecution Section
Division of Law
124 Halsey Street - 5th Floor
PO Box 45029
Newark, NJ 07102
Tel.: (973) 648-3546
Fax: (973) 648-4887
Donna.Dorgan@law.njoag.gov

For the State of New Mexico:

HECTOR H. BALDERAS
Attorney General

/s/ Lisa Giandomenico

LISA GIANDOMENICO
Assistant Attorney General
Office of the New Mexico Attorney General
Consumer & Environmental Protection Division
201 Third St NW, Suite 300
Albuquerque, NM 87102
Tel.: 505-490-4846
Fax: 505-318-1051
LGiandomenico@nmag.gov

For the State of New York:

LETITIA JAMES
Attorney General

/s/ Jane M. Azia

JANE M. AZIA

Bureau Chief

Bureau of Consumer Frauds & Protection

Office of the New York State Attorney General

28 Liberty Street

New York, NY 10005

Tel.: 212-416-8727

Fax: 212-416-6003

Jane.Azia@ag.ny.gov

For the Attorney General of North Carolina:

JOSH STEIN
Attorney General

/s/ Keith Clayton
KEITH T. CLAYTON
Special Deputy Attorney General
N.C. Department of Justice
P. O. Box 629
Raleigh, NC 27602
Tel.: 919-716-6000
Fax: 919-716-6019
Kclayton@ncdoj.gov

For the State of North Dakota

WAYNE STENEHJEM
Attorney General

/s/ Parrell D. Grossman

PARRELL D. GROSSMAN

(ID No. 04684)

Assistant Attorney General
Director, Consumer Protection
and Antitrust Division
Office of Attorney General
Gateway Professional Center
1050 E Interstate Ave, Ste. 200
Bismarck, ND 58503-5574
Tel.: 701-328-5570
Fax: 701-328-5568
Pgrossman@nd.gov

For the State of Ohio:

DAVE YOST
Ohio Attorney General

/s/ Tracy Morrison Dickens

TRACY MORRISON DICKENS

(Ohio Bar #0082898)

Tracy.Dickens@ohioattorneygeneral.gov

TIMOTHY W. EFFLER

(Ohio Bar #0083768)

Timothy.Effler@ohioattorneygeneral.gov

Assistant Attorneys General
Consumer Protection Section
30 E. Broad St., 14th Floor
Columbus, Ohio 43215
Tel.: 614-644-9618
Fax: 866-449-0989

For the State of Oklahoma:

MIKE HUNTER

Attorney General for the State of Oklahoma

/s/ Malisa McPherson

MALISA MCPHERSON, OBA #32070

Assistant Attorney General

Deputy Chief, Consumer Protection Unit

313 N.E. 21st Street

Oklahoma City, Oklahoma 73105

Tel.: 405-521-3921

Fax: 405-522-0085

Malisa.McPherson@oag.ok.gov

For the State of Oregon:

ELLEN ROSENBLUM
Attorney General

/s/ D. Althea Cullen
D. ALTHEA CULLEN
Assistant Attorney General
Oregon Department of Justice
Financial Fraud/Consumer Protection
100 SW Market St.
Portland, OR 97201
Tel.: 971-673-1880
Fax: 971-673-1888
Althea.d.cullen@doj.state.or.us

For the Commonwealth of Pennsylvania

JOSH SHAPIRO
Attorney General

/s/ Nicholas F.B. Smyth
NICHOLAS F. B. SMYTH
DC Bar # 1012913 (inactive status)
Senior Deputy Attorney General
Commonwealth of Pennsylvania
Office of Attorney General
1251 Waterfront Pl, Level M
Pittsburgh, PA 15222
Tel: 412-880-0475
Fax: 412-880-0196
Nsmyth@attorneygeneral.gov

For the State of Rhode Island:

PETER F. NERONHA
Attorney General

/s/ David Marzilli

DAVID MARZILLI

Rhode Island Office of the Attorney General

Special Assistant Attorney General

150 South Main Street

Providence, RI 02903

Tel: 401-274-4400 Ext. 2030

Fax: 401-222-1302

DMarzilli@riag.ri.gov

For the State of South Carolina:

ALAN WILSON
Attorney General

/s/ Jared Libet

JARED Q. LIBET
Assistant Deputy Attorney General
South Carolina Attorney General's Office
1000 Assembly Street
Columbia, SC 29201
Tel.: 803-734-3970
Fax: 803-734-3677
Jlibet@scag.gov

For the State of South Dakota:

/s/ Philip D. Carlson
PHILIP D. CARLSON
Assistant Attorney General
South Dakota Attorney General's Office
1302 E. Highway 14, Suite 1
Pierre, SD 57501
Tel.: 605-773-3215
Fax: 605-773-4106
Phil.Carlson@state.sd.us

For the State of Tennessee:

HERBERT H. SLATERY III
Attorney General and Reporter

/s/ Travis Brown

TRAVIS BROWN, B.P.R. No. 034164
Assistant Attorney General
Office of the Tennessee Attorney General
Public Protection Section
Consumer Protection Division
315 Deaderick St., 20th Fl.
Nashville, TN 37243
Tel.: (615) 741-3533
Fax: (615) 532-2510
Travis.Brown@ag.tn.gov
Attorney for the State of Tennessee

For the State of Texas:

/s/ Richard Bischoff

RICHARD L. BISCHOFF

Assistant Attorney General

Consumer Protection Division

401 E. Franklin Avenue, Suite 530

El Paso, Texas 79901

Tel.: 915- 834-5800

Fax: 915-542-1546

Richard.Bischoff@oag.texas.gov

For the State of Utah:

/s/ Sean D. Reyes

SEAN D. REYES

Utah Attorney General,

including as counsel for the Utah Division of Consumer Protection

350 North State Street, #230

Salt Lake City, UT 84114-2320

Tel.: 801-538-1191

Fax: 801-538-1121

uag@agutah.gov

For the State of Vermont:

THOMAS J. DONOVAN, JR.
Attorney General

/s/ James Layman
JAMES LAYMAN
Assistant Attorney General
109 State Street
Montpelier, VT 05609-1001
Tel.: 802-828-2315
James.Layman@vermont.gov

For The Commonwealth of Virginia,
ex rel. MARK R. HERRING,
Attorney General:

/s/ James E. Scott

JAMES E. SCOTT (VSB #88882)

Assistant Attorney General

Office of the Attorney General of Virginia

202 North 9th Street

Richmond, Virginia 23219

Tel.: 804-225-4778

Fax: 804-786-0122

JScott@oag.state.va.us

For the State of Washington:

ROBERT FERGUSON
Attorney General

/s/ Amy Teng

AMY TENG, WSBA #50003
Assistant Attorney General
Consumer Protection Division
Washington State
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
Tel: 206-464-7744
Fax: 206-587-5636
Amy.teng@atg.wa.gov

For the State of West Virginia:

PATRICK MORRISEY
Attorney General

/s/ Tanya L. Godfrey
TANYA L. GODFREY, DC Bar # 1016435
Assistant Attorney General
Office of the West Virginia Attorney General
Consumer Protection and Antitrust Division
PO Box 1789
Charleston, WV 25326
Tel.: 304-558-8986
Fax: 304-558-0184
Tanya.L.Godfrey@wvago.gov

For the State of Wisconsin:

JOSHUA L. KAUL
Attorney General of Wisconsin

/s/ Colin R. Stroud
Colin R. Stroud
Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
Tel.: 608-261-9224
Strouder@doj.state.wi.us

For the State of Wyoming:

BRIDGET HILL
Wyoming Attorney General

/s/ Benjamin M. Burningham

BENJAMIN M. BURNINGHAM

(Wyo. Bar No. #7-5616)

(DC Bar No. # 1021923) (inactive status)

Senior Assistant Attorney General

Kendrick Building

2320 Capitol Avenue

Cheyenne, WY 82002

Tel.: 307-777-7847

Fax: 307-777-3435

Ben.Burningham@wyo.gov