

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,
1275 W. Washington
Phoenix, AZ 85007

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

THE STATE OF CALIFORNIA,
455 Golden Gate Avenue, Ste. 11000
San Francisco, CA 94102-7007

THE STATE OF COLORADO,
1300 Broadway – 7th Floor
Denver, Colorado 80203

THE STATE OF CONNECTICUT,
55 Elm Street, P.O. Box 120
Hartford, CT 06141-0120

THE STATE OF DELAWARE,
820 N. French Street
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, Georgia 30334)
)
THE STATE OF HAWAII,)
425 Queen Street)
Honolulu, Hawaii 96813)
)
THE STATE OF IDAHO,)
700 W. Jefferson St.)
P.O. 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, Indiana 46204)
)
THE STATE OF IOWA,)
1305 E. Walnut St.)
Des Moines, IA 50319)
)
THE STATE OF KANSAS,)
120 SW 10th Avenue, 2nd Floor)
Topeka, KS 66612)
)
THE COMMONWEALTH OF KENTUCKY,)
State Capitol, Suite 118)
700 Capital Avenue)
Frankfort, Kentucky 40601-3449)
)
THE STATE OF LOUISIANA,)
1885 N. Third Street)
Baton Rouge, Louisiana 70802)
)
THE STATE OF MAINE,)
Burton Cross Office Building, 6th Floor)
111 Sewall Street)
Augusta, Maine 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)
PO Box 30755)
Lansing, MI 48909)
)
THE STATE OF MINNESOTA,)
445 Minnesota Street, Suite 1200)
St. Paul, MN 55101-2130)
)
THE STATE OF MISSISSIPPI,)
Post Office Box 22947)
Jackson, MS 39225-2947)
)
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, Nevada 89701)
)
THE STATE OF NEW JERSEY,)
124 Halsey Street – 5th Floor)
P.O. Box 45029)
Newark, New Jersey 07101)
)
THE STATE OF NEW MEXICO,)
PO Drawer 1508)
Santa Fe, NM 87504-1508)

THE STATE OF NEW YORK,)
120 Broadway)
New York, NY 10271)
)
THE STATE OF NORTH CAROLINA,)
P. O. 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, Oklahoma 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,)
425 Fifth Avenue North)
Nashville, TN 37243-3400)

THE STATE OF TEXAS,)
401 E. Franklin Avenue, Suite 530)
El Paso, Texas 79901)
)
THE STATE OF UTAH,)
350 North State Street, #230)
Salt Lake City, UT 84114-2320)
)
THE STATE OF VERMONT,)
109 State Street)
Montpelier, Vermont 05609)
)
THE COMMONWEALTH OF VIRGINIA,)
202 North 9th Street)
Richmond, Virginia 23219)
)
THE STATE OF WASHINGTON,)
800 Fifth Avenue, Suite 2000)
Seattle, WA 98104)
)
THE STATE OF WEST VIRGINIA,)
State Capitol, Room 26E)
Charleston, WV 25305-0220)
)
THE STATE OF WISCONSIN,)
Post Office Box 7857)
Madison, Wisconsin 53707-7857)
)
THE STATE OF WYOMING,)
Kendrick Building)
2320 Capitol Avenue)
Cheyenne, WY 82002)
)
and)
)
THE DISTRICT OF COLUMBIA,)
441 Fourth Street, N.W., Suite 600-S)
Washington, DC 20001)
)
Plaintiffs,)
)
v.)

PHH MORTGAGE CORPORATION,)
3000 Leadenhall Rd.)
Mt. Laurel, NJ 08054)
)
Defendant.)
)
)
_____)

COMPLAINT

Now comes 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 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, “Plaintiffs” 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 PHH Mortgage Corporation (“Defendant” or “PHH”) for alleged misconduct related to its servicing of single-family residential mortgages.
2. As described in the allegations below, Defendant’s misconduct resulted in premature and unauthorized foreclosures, violation of homeowners’ rights and protections, and the use of false and deceptive affidavits and other documents.

THE PARTIES

3. 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 civil penalties for violation of the consumer protection laws of their States and the CFPA.

4. PHH is a privately held corporation that provides residential mortgage origination and servicing services. It has its principal place of business in Mount Laurel, New Jersey. PHH transacts or has transacted business in this district and throughout the United States.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this action because it is “brought under Federal consumer financial law,” 12 U.S.C. § 5565(a), 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).

6. In addition, pursuant to 28 U.S.C. § 1367(a), this Court has supplemental jurisdiction over the subject matter of the state law 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).

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

THE MORTGAGE SERVICING INDUSTRY

8. 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.

9. 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.

10. 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.

11. 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.” 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.

PHH’S MORTGAGE SERVICING MISCONDUCT

12. PHH 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.

13. PHH 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 and abusive acts or practices. 12 U.S.C. §§ 5481(6), 5531, and 5536(a).

14. PHH is engaged in trade or commerce in each of the Plaintiffs’ States and is subject to the consumer protection laws of the Plaintiffs’ States in the conduct of their debt collection, mortgage servicing, loss mitigation and foreclosure activities. The consumer protection laws of the Plaintiffs’ States include laws prohibiting unfair or deceptive acts or practices.

15. PHH 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 mortgages, or who require loss mitigation assistance.

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

17. In certain instances in the course of its mortgage servicing activities during the period from January 1, 2009, to December 31, 2012, PHH engaged in the following acts and practices:

- a. failing to timely and accurately apply payments made by certain borrowers and failing to maintain accurate account statements;
- b. charging unauthorized fees for default-related services;
- c. threatening foreclosure and conveying conflicting messages to certain borrowers engaged in loss mitigation;
- d. failing to properly respond to certain borrowers' complaints and reasonable requests for information and assistance;
- e. failing to properly process borrowers' applications for loan modifications, including failing to account for and retain loss mitigation documents submitted by borrowers;
- f. failing to maintain complete loan servicing files;
- g. failing to maintain adequate documentation to determine whether PHH had standing to foreclose;
- h. failing to properly oversee third party vendors retained for servicing and foreclosure operations, including third party vendors responsible for preparing, reviewing, and executing foreclosure documents;
- i. preparing, executing, notarizing, and presenting documents with incorrect or incomplete information with courts and government agencies, or otherwise using incorrect or incomplete documents as part of the foreclosure process (including, but not limited to, affidavits, declarations, certifications, substitutions of trustees, and assignments);
- j. preparing, executing, notarizing, and filing affidavits in foreclosure proceedings, whose affiants lacked personal knowledge of the assertions in the affidavits

and did not review any information or documentation to verify the assertions in such affidavits; and

k. failing to maintain a comprehensive process for the preparation, execution, and notarization of certain documents that are part of the foreclosure process including, but not limited to, affidavits, declarations and certifications.

COUNT I

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

18. The allegations in paragraphs 1 through 17 above are incorporated herein by reference.

19. The loan servicing conduct of PHH, as described above, constitutes unfair or deceptive practices in violation of the consumer protection laws of each Plaintiff State.

20. PHH's unlawful conduct has resulted in injury to the Attorneys General and consumers residing in their states who have had home loans serviced by PHH. The harm sustained by such citizens includes payment of improper fees and charges, misapplication of payments, dual tracking activity, and loss of homes due to improper, unlawful, or undocumented foreclosures. The harm to the Attorneys General includes the subversion of their legal process and the sustained violations of their laws. The Attorneys General have had to incur substantial expenses in the investigations and attempts to obtain remedies for PHH's unlawful conduct.

COUNT II

**VIOLATIONS OF STATE LAW PROHIBITING
UNFAIR AND DECEPTIVE CONSUMER PRACTICES
WITH RESPECT TO FORECLOSURE PROCESSING**

21. The allegations in paragraphs 1 through 17 above are incorporated herein by reference.

22. The foreclosure processing conduct of PHH, as described above, constitutes unfair or deceptive practices in violation of the consumer protection laws of each Plaintiff State.

23. PHH's unlawful conduct has resulted in injury to the Attorneys General and consumers residing in their states who have had home loans serviced by PHH. The harm sustained by such citizens includes payment of improper fees and charges, misapplication of payments, dual tracking activity, and loss of homes due to improper, unlawful, or undocumented foreclosures. The harm to the Attorneys General includes the subversion of their legal process and the sustained violations of their laws. The Attorneys General have had to incur substantial expenses in the investigations and attempts to obtain remedies for PHH's unlawful conduct.

COUNT III

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

24. The allegations in paragraphs 1 through 17 above are incorporated herein by reference.

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

COUNT IV

**VIOLATIONS OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010
WITH RESPECT TO FORECLOSURE PROCESSING**

26. The allegations in paragraphs 1 through 17 above are incorporated herein by reference.

27. The foreclosure processing conduct of PHH, as described above, constitutes unfair and deceptive acts or practices in violation of 12 U.S.C. §§ 5531(a) and 5536.

PRAYER FOR RELIEF

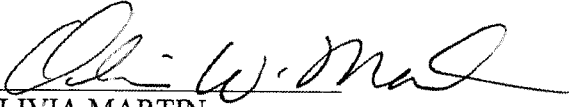
WHEREFORE, the Attorneys General, pursuant to 12 U.S.C. §§ 5552 and 5565 and their consumer protection laws, respectfully request that judgment be entered in their favor and against Defendant for each violation charged in the complaint, and request that the Court:

- A. Permanently 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: January 3, 2018

Respectfully submitted,


For the State of Alabama:



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

For the State of Alaska:


JONATHAN P. CLEMENT
Assistant Attorney General
Alaska Attorney General's Office
1031 W. 4th Avenue, Ste. 200
Anchorage, AK 99501
Tel.: 907-269-5200
Fax: 907-276-3697

For the State of Arizona:



MARK BRNOVICH
Arizona Attorney General
by Matthew du Mee
Assistant Attorney General
2005 N. Central Ave.
Phoenix, AZ 85004-1592
Tel.: 602-542-5025
Fax: 602-542-4085

For the State of Arkansas:

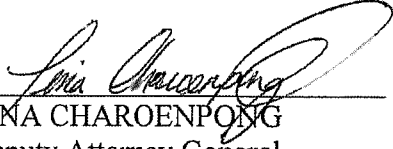
LESLIE RUTLEDGE
Attorney General



SARAH PAGE TACKER
Ark. Bar No. 2002-189
Senior Assistant Attorney General
Office of the Attorney General
323 Center Street, Suite 200
Little Rock, Arkansas 72201
Tel.: 501-682-5028
Fax: 501-682-8118

For the State of California:

XAVIER BECERRA
Attorney General



TINA CHAROENPONG
Deputy Attorney General
Office of the Attorney General
300 South Spring Street, Ste. 1702
Los Angeles, CA 90013
Tel.: 213-269-6000
Fax: 213-897-4951

For the State of Colorado, *ex. rel.*

CYNTHIA COFFMAN, Attorney General:



JENNIFER MINER DETHMERS

THERESA C. LESHER

Assistant Attorneys General

Consumer Protection Section

Colorado Department of Law

Ralph L. Carr Colorado Judicial Center

1300 Broadway, 7th Floor

Denver, Colorado 80203

Tel.: 720-508-6228

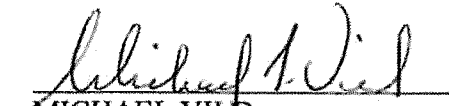
Fax: 720-508-6040

For the State of Connecticut:

A handwritten signature in cursive script, appearing to read "Joseph J. Chambers", is written over a horizontal line.

Joseph J. Chambers
Assistant Attorney General
Finance Department Head
Connecticut Office of the Attorney General
P.O. Box 120
55 Elm Street
Hartford, Connecticut 06141-120
Telephone: (860) 808-5270

For the State of Delaware:



MICHAEL VILD

Director, Fraud Division
Delaware Department of Justice
820 N. French Street, 5th Floor
Wilmington, DE 19801
Tel.: 302-577-8533
Fax: 302-577-8426

For the District of Columbia:

KARL A. RACINE
Attorney General for the District of Columbia

NATALIE LUDAWAY
Chief Deputy

A handwritten signature in black ink, appearing to read 'P. Ziperman', written over a horizontal line.

PHILIP ZIPERMAN
Director, Office of Consumer Protection
Office of the Attorney General
441 Fourth Street, N.W., Suite 600-South
Washington, DC 20001
Tel: 202-727-5173
Fax: 202-730-1469

For the State of Florida:

PAMELA JO BONDI
Attorney General

PATRICIA A. CONNERS
Chief Deputy Attorney General


VICTORIA A. BUTLER
Director, Consumer Protection Division



ANTHONY S. BRADLOW
Assistant Attorney General
FL Bar No. 104904
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

For the State of Georgia:

CHRISTOPHER M. CARR
Attorney General


JEFFREY W. STUMP

Senior Assistant Attorney General

Georgia Department of Law

40 Capitol Square, S.W.

Atlanta, Georgia 30334

Tel.: 404-656-3337

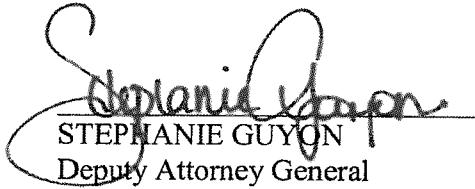
Fax: 404-656-0677

For the State of Hawaii:

A handwritten signature in black ink, appearing to read "James C. Paige", is written over a horizontal line.

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

For the State of Idaho
LAWRENCE WASDEN, Attorney General:

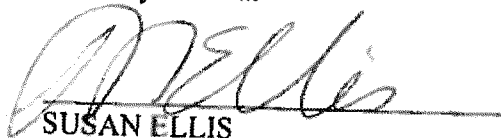


STEPHANIE GUYON
Deputy Attorney General

Office of the Idaho Attorney General
954 W. Jefferson St., 2nd Fl.
P.O. Box 83720
Boise, ID 83720-0010
Tel.: 208-334-2424
Fax: 208-334-4151

For the State of Illinois:

LISA MADIGAN
Attorney General

A handwritten signature in cursive script, appearing to read "S. Ellis", written over a horizontal line.

SUSAN ELLIS

Chief, Consumer Fraud Bureau

ANDREW DOUGHERTY

Assistant Attorney General

Illinois Attorney General's Office

100 W. Randolph, 12th Floor

Chicago, IL 60601

Tel.: 312-814-6351

Fax: 312-814-2593

For the State of Indiana:



BETSY M. ISENBERG

Director of the Consumer Protection Division
Office of Indiana Attorney General Curtis Hill
302 West Washington Street

IGCS – 5th Floor

Indianapolis, IN 46204

Tel.: 317-232-6231

Fax: 317-232-7979

For the State of Iowa:



PATRICK MADIGAN

Assistant Attorney General

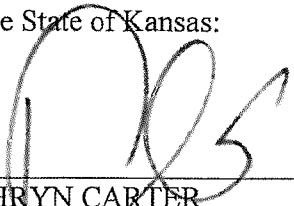
Iowa Attorney General's Office

1305 E. Walnut St.

Des Moines, IA 50319

Tel: 515-281-5926

For the State of Kansas:



KATHRYN CARTER
Assistant Attorney General
Office of the Kansas Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, KS 66612
Tel.: 785-296-3751
Fax: 785-291-3699

For the Office of the Attorney General of Kentucky:

ANDY BESHEAR
Attorney General



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

For the State of Louisiana:

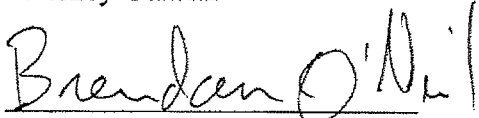
JEFF LANDRY
Attorney General



Alberto A. De Puy
Louisiana Bar Roll Number 30475
Assistant Attorney General
Louisiana Department of Justice
Office of the Attorney General
Public Protection Division
Consumer Protection Division
1885 North Third Street
Baton Rouge, Louisiana 70802
Tel.: 225-326-6471
Fax: 225-326-6499

For the State of Maine:


JANET T. MILLS
Attorney General

A handwritten signature in black ink that reads "Brendan O'Neil". The signature is written in a cursive style with a horizontal line underneath the name.

Brendan O'Neil, Maine Bar # 9900
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

For the State of Maryland:

BRIAN E. FROSH
Attorney General

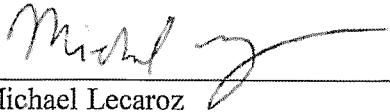


LUCY A. CARDWELL

Special Assistant Attorney General
Office of the Attorney General of Maryland
Consumer Protection Division
200 Saint Paul Place, 16th Floor
Baltimore, MD 21202
Tel: 410-576-6337
Fax: 410-576-6566

For the Commonwealth of Massachusetts:

Maura Healey
Attorney General



Michael Lecaroz
Mass. BBO # 672397
Assistant Attorney General
Consumer Protection Division
One Ashburton Place
Boston, MA 02108
Tel: 617-727-2200

For the State of Michigan:



BILL SCHUETTE

Attorney General

D.J. PASCOE

Assistant Attorney General

525 W. Ottawa Street

PO Box 30755

Lansing, MI 48909

Tel.: 517-373-1160

Fax: 517-335-3755

For the State of Minnesota:

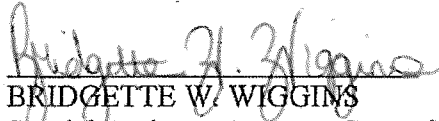
LORI SWANSON
Attorney General, State of Minnesota



JASON PLEGGENKUHLE
Assistant Attorney General
Minnesota Attorney General's Office
445 Minnesota Street, Suite 1200
St. Paul, MN 55101-2130
Tel.: 651-757-1147
Fax: 651-282-5832

For the State of Mississippi:

JIM HOOD, ATTORNEY GENERAL



BRIDGETTE W. WIGGINS

Special Assistant Attorney General

Mississippi Attorney General's Office

Post Office Box 22947

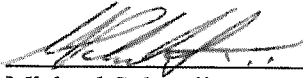
Jackson, MS 39225-2947

Tel.: 601-359-4279

Fax: 601-359-4231

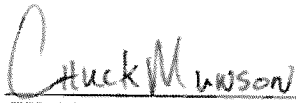
For the State of Missouri:

JOSHUA D. HAWLEY
Attorney General



Michael Schwalbert, MO Bar #63229
Assistant Attorney General
815 Olive Street, Suite 200
Saint Louis, Missouri 63101
Phone: 314-340-7888
Fax: 314-340-7957
michael.schwalbert@ago.mo.gov

For the State of Montana:

Handwritten signature of Chuck Munson in cursive, written over a horizontal line.

TIMOTHY C. FOX

Attorney General

CHUCK MUNSON

Assistant Attorney General

Montana Department of Justice

215 N. Sanders

Helena MT 59624

Tel.: 406-444-2026

Fax: 406-444-3549

For the State of Nebraska:

DOUGLAS J. PETERSON,
Attorney General, #18146



MEGHAN E. STOPPEL, #26290
Assistant Attorney General
Office of the Attorney General
2115 State Capitol
Lincoln, NE 68509-8920
Tel.: 402-471-2811
Fax: 402-471-4725

For the State of Nevada:

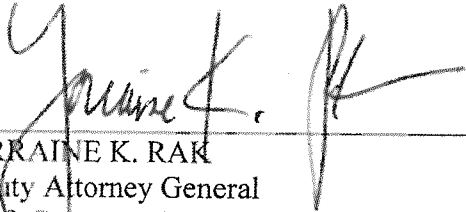
ADAM PAUL LAXALT
Attorney General



SHERI ANN FORBES
Senior Deputy Attorney General
Nevada Bar No. 7337
10791 W. Twain Avenue, Ste. 100
Las Vegas, Nevada 89135
Tel: 702-486-3085
Fax: 702-486-3283

For the State of New Jersey:

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY



LORRAINE K. RAK
Deputy Attorney General
Chief, Consumer Fraud Prosecution Section
Division of Law
124 Halsey Street – 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Tel.: 973-877-1280
Fax: 973-648-4887

For the State of New Mexico:
HECTOR H. BALDERAS, Attorney General



SCOTT CAMERON
Assistant Attorney General
Office of the New Mexico Attorney General
Consumer Protection Division
201 Third St NW, Suite 300
Albuquerque, NM 87102
Tel: 505-717-3511
Fax: 505-318-1051

For the State of New York:

ERIC T. SCHNEIDERMAN
Attorney General



JANE M. AZIA

Bureau Chief
Bureau of Consumer Frauds & Protection
Office of the New York State Attorney General
120 Broadway
New York, NY 10271
Tel.: 212-416-8727
Fax: 212-416-6003

For the Attorney General of North Carolina:

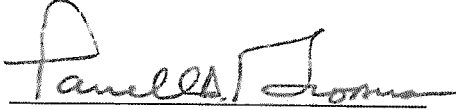
JOSH STEIN
Attorney General



KEITH Y. 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

For the State of North Dakota

WAYNE STENEHJEM
Attorney General

A handwritten signature in black ink, appearing to read "Parrell D. Grossman", written over a horizontal line.

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

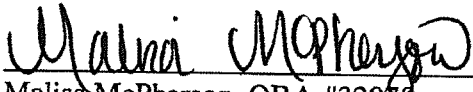
For the State of Ohio:

MIKE DEWINE
Ohio Attorney General


JEFFREY R. LOESER (Ohio Bar #0082144)
Senior Assistant Attorney General
Consumer Protection Section
30 E. Broad St., 14th Floor
Columbus, OH 43215
Tel.: 614-644-9618
Fax: 877-650-4712

For the State of Oklahoma:

MIKE HUNTER
ATTORNEY GENERAL FOR THE
STATE OF OKLAHOMA



Malisa McPherson, OBA #32070
Assistant Attorney General
Deputy Chief, Consumer Protection Unit
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
Telephone: (405) 521-3921
Fax: (405) 522-0085
Email: Malisa.McPherson@oag.ok.gov

For the State of Oregon,

Attorney General
ELLEN ROSENBLUM:

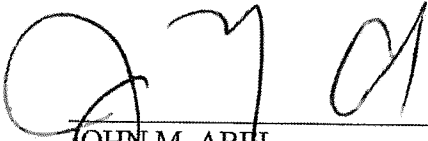


D. ALTHEA CULLEN

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

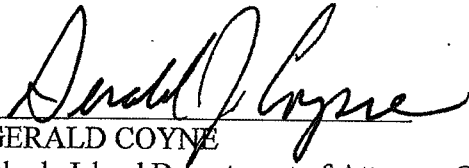
For the Commonwealth of Pennsylvania

JOSH SHAPIRO
Attorney General



JOHN M. ABEL
Senior Deputy Attorney General
Commonwealth of Pennsylvania
Office of Attorney General
Bureau of Consumer Protection
15th Floor, Strawberry Square
Harrisburg, PA 17120
Tel: 717-787-1439
Fax: 717-705-3795

For the Rhode Island Department of Attorney General:

A handwritten signature in cursive script, appearing to read "Gerald Coyne", written over a horizontal line.

GERALD COYNE

Rhode Island Department of Attorney General

Deputy Attorney General

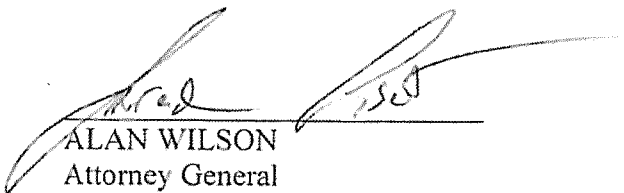
150 South Main Street

Providence, RI 02903

Tel: 401-274- 4400 Ext. 2257

Fax: 401- 222-1302

For the State of South Carolina:



ALAN WILSON
Attorney General

W. JEFFREY YOUNG

Chief Deputy Attorney General

C. HAVIRD JONES, JR.

Senior Assistant Deputy Attorney General

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

For the State of South Dakota:



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

For the State of Tennessee:

HERBERT H. SLATERY III, B.P.R. No. 9077
Attorney General and Reporter




TRAVIS BROWN, B.P.R. No. 34164
Assistant Attorney General
Consumer Protection and Advocate Division
Public Protection Section
Office of the Tennessee Attorney General
315 Deaderick Street, 20th Floor
Nashville, TN 37243
Tel.: 615-741-3533
Fax: 615-532-2901
travis.brown@ag.tn.gov

For the State of Texas:



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

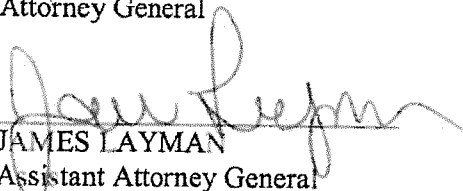
For the State of Utah:

A handwritten signature in black ink, appearing to read "Sean D. Reyes". The signature is fluid and cursive, with the first name "Sean" and last name "Reyes" clearly distinguishable.

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

For the State of Vermont:

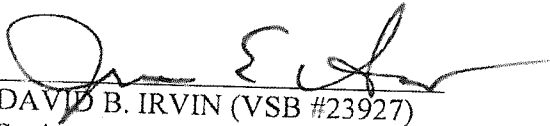
THOMAS J. DONOVAN, JR.
Attorney General



JAMES LAYMAN
Assistant Attorney General
109 State Street
Montpelier, VT 05609-1001
(802) 828-2315

For The Commonwealth of Virginia,

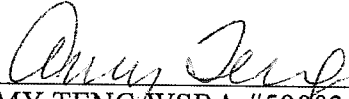
ex rel. MARK HERRING,
Attorney General:



DAVID B. IRVIN (VSB #23927)
Senior Assistant Attorney General
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

For the State of Washington:

ROBERT FERGUSON
Attorney General



AMY TENG/WSBA #50003
Assistant Attorney General
Consumer Protection Division
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
Tel: 206-464-7745
Fax: 206-587-5636

For the State of West Virginia:

STATE OF WEST VIRGINIA
PATRICK MORRISEY
ATTORNEY GENERAL



R. STEPHEN JARRELL
Assistant Attorney general
Office of the Attorney General of West Virginia
812 Quarrier Street, 1st Floor
P.O. Box 1789
Charleston, WV 25326
Tel: 304-558-8986
Fax: 304-558-0184

For the State of Wisconsin:

BRAD SCHIMEL
Attorney General



GWENDOLYN J. COOLEY
Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
Tel: 608-261-5810
Fax: 608-267-2778

For the State of Wyoming:



PETER K. MICHAEL
Wyoming Attorney General
Benjamin M. Burningham (Wyo. Bar. No. #7-5616)
Assistant Attorney General
Kendrick Building
2320 Capitol Avenue
Cheyenne, WY 82002
Tel.: 307-777-7847
Fax: 307-777-3435