**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF MARYLAND**

CONSUMER FINANCIAL PROTECTION BUREAU *

and *

CONSUMER PROTECTION DIVISION
OFFICE OF THE ATTORNEY GENERAL * Case No. 1:1-cv-01235-RDB

Plaintiffs, *

v. *

GARY KLOPP, *

ALL COUNTY SETTLEMENTS, LLC *

and *

CARROLL ABSTRACTS, INC. *

Defendants, *

and *

1st Mariner Bank *
6011 University Blvd.
Ellicott City, MD 21043 *

Howard Bank *
Attn. Joseph F. Howard, Resident Agent
3301 Boston Street *
Baltimore, MD 21224
*

H. Beck, Inc.
The Corporation Trust Incorporated, Resident Agent *
2405 York Road
Suite 201 *
Lutherville Timonium, MD 21093-2264
*

Fidelity Brokerage Services LLC
The Corporation Trust Incorporated, Resident Agent *
2405 York Road
Suite 201 *
Lutherville Timonium, MD 21093-2264
*

Bank of America
The Corporation Trust Incorporated, Resident Agent *
2405 York Road
Suite 201 *
Lutherville Timonium, MD 21093-2264
*

Peoples Bank & Trust
517 Washington St. *
Ryan, OK 73565
*

Wells Fargo Bank, NA
CSC-Lawyers Incorporating Service Company, *
Resident Agent,
7 St. Paul St. 820 *
Baltimore, MD 21202
*

TD Ameritrade
Incorporating Services of Maryland, Ltd., *
Resident Agent
715 St. Paul St. *
Baltimore, MD 21202
*

JP Morgan Chase Bank, NA
The Corporation Trust Incorporated, *
Resident Agent
2405 York Road *
Suite 201
Lutherville Timonium, MD 21093-2264 *

Manufacturers and Traders Trust Co. *
CSC-Lawyers Incorporating Service Company,
Resident Agent *
7 St. Paul St. 820
Baltimore, MD 21202 *

Navy Federal Credit Union *
CSC-Lawyers Incorporating Service Company
Resident Agent *
7 St. Paul St., Suite 820
Baltimore, MD 21202 *

Garnishees. *

* * * * * * *

**APPLICATION FOR WRIT OF GARNISHMENT OF ACCOUNTS IN FINANCIAL INSTITUTION**

**(**28 U.S.Code § 3205 and Maryland Rule 2-645.1)

Plaintiffs Consumer Financial Protection Division and the Consumer Protection Division of the Office of the Maryland Attorney General seek pursuant to 28 U.S. Code § 3205 writs of garnishment for accounts in financial institutions for which the Defendant/Judgment Debtor Gary L. Klopp has substantial nonexempt interests. The requested writs of garnishment may satisfy the amount due on the judgment. An Affidavit of Lucy A. Cardwell is attached. In support of this application, Plaintiffs state:

A final order imposing a monetary sanction of $526,796.36 was entered in the above-entitled action on May 21, 2018. No supersedeas bond has been posted; nor is a stay of execution or proceedings to enforce judgment in effect.

The amount now due on the judgment is as follows:

| | |
|---|---|
| $526,796.36 | Amount of original judgment |
| $22,370.80 | Plus post-judgment interest for the period from May 21, 2018 to October 23, 2018 or about $144.33 per diem. |
| $0 | Plus court costs |
| $0 | Less payments made |
| $549,167.16 | Net due |

Defendant/Judgment Debtor:

Gary L. Klopp
2915 Eden Drive
Manchester, MD 21102

Plaintiffs/Judgment Creditors:

Consumer Financial Protection Bureau
1700 G Street NW
Washington D.C. 20552
(202) 435-7265

Consumer Protection Division
200 St. Paul Place, 16th Floor
Baltimore, MD 21202
(410) 576-6337

Garnishees:

1st Mariner Bank
6011 University Blvd.
Ellicott City, MD 21043

Howard Bank
Attn. Joseph F. Howard, Resident Agent
3301 Boston Street
Baltimore, MD 21224

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Navy Federal Credit Union
CSC-Lawyers Incorporating Service Company
Resident Agent
7 St. Paul St., Suite 820
Baltimore, MD 21202.

In accordance with the attached Affidavit of Lucy A. Cardwell, (1) no motions for reconsideration are pending; (2) no motions to vacate are pending; (3) no supersedeas bond has been posted; (4) the judgment is final as to all parties and claims in conformity with Fed. R. Civ. P. 54(b); (5) no stay of execution is pending on the judgment; and (6) the judgment debtor is a

Maryland resident. For these reasons, Plaintiffs seek the attached proposed writs of garnishment.

CONSUMER FINANCIAL PROTECTION BUREAU:

KRISTEN DONOGHUE
Enforcement Director
JEFFREY PAUL EHRLICH
Deputy Enforcement Director
KARA MILLER
Assistant Litigation Deputy

By: _____/s/_____
(signed with permission by Lucy A. Cardwell)
BENJAMIN KONOP (Ohio Bar No. 0073458)
Enforcement Attorney
1700 G Street NW
Washington, DC 20552
Email: benjamin.konop@cfpb.gov
Telephone: (202) 435-7265
Facsimile: (202) 435-7722

ATTORNEY GENERAL OF MARYLAND:

Brian E. Frosh
Attorney General of Maryland

By: /s/_____
LUCY A. CARDWELL (Md. Bar No. 07311)
Special Assistant Attorney General
200 St. Paul Place, 16th Floor
Baltimore, MD 21202
Telephone: (410) 576-6337
Facsimile: (410) 576-6566
Email: lcardwell@oag.state.md.us

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of October, 2018, I served by certified mail, Plaintiffs' Application for Writ of Garnishment Against Gary Klopp, an Affidavit and proposed

writs of garnishment on each of the garnishees.

/s/

Lucy A. Cardwell