UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CONSUMER FINANCIAL PROTECTION BUREAU,
1700 G Street, NW
Washington, DC 20552

THE STATE OF ALABAMA,
Alabama Attorney General's Office
501 Washington Avenue
Montgomery, AL 36130

THE STATE OF ALASKA,
Alaska Attorney General's Office
1031 W. 4th Avenue, Ste. 200
Anchorage, AK 99501

THE STATE OF ARIZONA,
Arizona Attorney General's Office
1275 W. Washington
Phoenix, AZ 85007

THE STATE OF ARKANSAS,
Office of the Attorney General
323 Center Street, Suite 200
Little Rock, AK 72201

THE STATE OF CALIFORNIA,
California Attorney General's Office
455 Golden Gate Avenue, Ste. 11000
San Francisco, CA 94102-7007

THE STATE OF COLORADO,
Colorado Attorney General's Office
Ralph L. Carr Colorado Judicial Center
1300 Broadway, 7th Floor
Denver, CO 80203

THE STATE OF CONNECTICUT,
Office of the Connecticut Attorney General
55 Elm Street, P.O. Box 120
Hartford, CT 06141-0120

THE STATE OF DELAWARE,
Delaware Attorney General's Office
820 N. French Street
Wilmington, DE 19801

THE STATE OF FLORIDA,
Department of Legal Affairs
Office of the Attorney General
3507 E. Frontage Road, Suite 325
Tampa, FL 33607

THE STATE OF GEORGIA,
Georgia Department of Law
40 Capitol Square, S.W.
Atlanta, GA 30334

THE STATE OF HAWAII,
Department of the Attorney General
425 Queen Street
Honolulu, HI 96813

THE STATE OF IDAHO,
Office of the Idaho Attorney General
700 W. Jefferson St.
P.O. Box 83720
Boise, ID 83720-0010

THE STATE OF ILLINOIS,
Office of the Illinois Attorney General
500 South Second Street
Springfield, IL 62706

THE STATE OF INDIANA,
Indiana Office of the Attorney General
302 West Washington St., IGCS 5th Fl.
Indianapolis, IN 46204

THE STATE OF IOWA,
Iowa Attorney General's Office
1305 E. Walnut St.
Des Moines, IA 50319

THE STATE OF KANSAS,
Office of the Kansas Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, KS 66612

THE COMMONWEALTH
OF KENTUCKY,
Office of the Attorney General of Kentucky
State Capitol, Suite 118
700 Capital Avenue
Frankfort, KY 40601-3449

THE STATE OF LOUISIANA,
Louisiana Attorney General's Office
1885 N. Third Street
Baton Rouge, LA 70802

THE STATE OF MAINE,
Maine Attorney General's Office
Burton Cross Office Building, 6th Floor
111 Sewall Street
Augusta, ME 04330

THE STATE OF MARYLAND,
Office of the Attorney General of Maryland
200 Saint Paul Place
Baltimore, MD 21202

THE COMMONWEALTH
OF MASSACHUSETTS,
Massachusetts Attorney General's Office
One Ashburton Place
Boston, MA 02108

THE STATE OF MICHIGAN,
Michigan Department of Attorney General
525 W. Ottawa Street
PO Box 30755
Lansing, MI 48909

THE STATE OF MINNESOTA,
Minnesota Attorney General's Office
445 Minnesota Street, Suite 1200
St. Paul, MN 55101-2130

THE STATE OF MISSISSIPPI,
Mississippi Attorney General's Office
Post Office Box 22947
Jackson, MS 39225-2947

THE STATE OF MISSOURI,
Missouri Attorney General's Office
PO Box 899
Jefferson City, MO 65102

THE STATE OF MONTANA,
Montana Department of Justice
215 N. Sanders
Helena, MT 59624

THE STATE OF NEBRASKA,
Office of the Attorney General
2115 State Capitol
Lincoln, NE 68509-8920

THE STATE OF NEVADA,
Nevada Office of the Attorney General
100 North Carson Street
Carson City, NV 89701

THE STATE OF NEW HAMPSHIRE,
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301

THE STATE OF NEW JERSEY,
New Jersey Attorney General's Office
124 Halsey Street – 5th Floor
P.O. Box 45029
Newark, NJ 07101

THE STATE OF NEW MEXICO,
Office of the New Mexico Attorney General
PO Drawer 1508
Santa Fe, NM 87504-1508

THE STATE OF NEW YORK,
Office of the New York State
Attorney General
120 Broadway
New York, NY 10271

THE STATE OF NORTH CAROLINA,
North Carolina Department of Justice
P.O. Box 629
Raleigh, NC 27602

THE STATE OF NORTH DAKOTA,
Office of the Attorney General
Gateway Professional Center
1050 E Interstate Ave, Ste. 200
Bismarck, ND 58503-5574

THE STATE OF OHIO,
Ohio Attorney General's Office
30 E. Broad St., 15th Floor
Columbus, OH 43215

THE STATE OF OREGON,
Oregon Department of Justice
1515 SW 5th Avenue, Ste. 410
Portland, OR 97201

THE COMMONWEALTH
OF PENNSYLVANIA,
Office of the Attorney General
16th Floor, Strawberry Square
Harrisburg, PA 17120

THE STATE OF RHODE ISLAND,
Rhode Island Department
of Attorney General
150 South Main Street
Providence, RI 02903

THE STATE OF SOUTH CAROLINA,
South Carolina Attorney General's Office
1000 Assembly Street, Room 519
Columbia, SC 29201

THE STATE OF SOUTH DAKOTA,
South Dakota Attorney General's Office
1302 E. Highway 14, Suite 1
Pierre, SD 57501

THE STATE OF TENNESSEE,
Office of the Tennessee Attorney General
425 Fifth Avenue North
Nashville, TN 37243-3400

THE STATE OF TEXAS,
Texas Attorney General's Office
401 E. Franklin Avenue, Suite 530
El Paso, TX 79901

THE STATE OF UTAH,
Division of Consumer Protection
Utah Attorney General's Office
350 North State Street, #230
Salt Lake City, UT 84114-2320

THE STATE OF VERMONT,
Office of the Attorney General
109 State Street
Montpelier, VT 05609

THE COMMONWEALTH OF VIRGINIA,
Office of the Virginia Attorney General
900 East Main Street
Richmond, VA 23219

THE STATE OF WASHINGTON,
Washington State Attorney General's Office
1250 Pacific Avenue, Suite 105
PO Box 2317
Tacoma, WA 98402-4411

THE STATE OF WEST VIRGINIA,
West Virginia Attorney General's Office
State Capitol, Room 26E
Charleston, WV 25305-0220

THE STATE OF WISCONSIN,
Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857

THE STATE OF WYOMING, and
Wyoming Attorney General's Office
123 State Capitol Bldg.
Cheyenne, WY 82002

THE DISTRICT OF COLUMBIA,
Office of the Attorney General
441 Fourth Street, N.W.
Washington, DC 20001

Plaintiffs,	)
v.	)
OCWEN FINANCIAL CORPORATION,	)
and OCWEN LOAN SERVICING, LLC,	)
Defendants.	)

COMPLAINT

Now comes the Consumer Financial Protection Bureau (the "CFPB" or "Bureau"), and 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, 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") by and through their undersigned attorneys, and respectfully allege as follows:

INTRODUCTION

1. This is a civil action filed jointly by the Bureau and the Plaintiff States against Ocwen Financial Corporation and Ocwen Loan Servicing, LLC (collectively, "Defendants" or "Ocwen"), for misconduct related to the servicing of single family residential mortgages, including by Homeward Residential, Inc. ("Homeward") and Litton Loan Servicing, LP ("Litton") before their acquisition by Ocwen Financial Corporation. Ocwen, Homeward, and

Litton are collectively referred to herein as the "Servicers."

2. As described in the allegations below, the Servicers' 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 Bureau, an independent agency of the United States created by the Consumer Financial Protection Act of 2010 (CFPA), 12 U.S.C. § 5491(a) et seq. The Bureau is authorized to take appropriate enforcement action to address violations of Federal consumer financial law, including the CFPA, and has independent litigating authority. *See* 12 U.S.C. §§ 5511(c)(4); 5512(a); 5531(a); and 5564(a). Sections 1031 and 1036(a) of the CFPA, 12 U.S.C. §§ 5531 and 5536(a), prohibit unfair, deceptive, or abusive acts or practices, or other violations of Federal consumer financial law, by any covered person or service provider.

4. This action is also brought by the Plaintiff States 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.

5. Defendant Ocwen Financial Corporation is a publicly traded Florida corporation headquartered in Atlanta, Georgia, that provides residential mortgage servicing services. It engages in a variety of businesses related to residential mortgage servicing, and focuses on loan servicing, specialty servicing, and mortgage services. Ocwen Financial Corporation transacts or has transacted business in this district and throughout the United States. On December 27, 2012, Ocwen Financial Corporation acquired and became the successor in interest to Homeward, a

servicer of residential mortgages and a Delaware corporation. Ocwen Financial Corporation is a successor corporation to Homeward and is liable for the illegal practices, including those of Homeward, alleged in this Complaint. On September 1, 2011, Ocwen acquired and became the successor in interest to Litton, a servicer of residential mortgages and a Delaware limited partnership. Ocwen Financial Corporation is a successor corporation to Litton and is liable for the illegal practices, including those of Litton, alleged in this Complaint.

6. Defendant Ocwen Loan Servicing, LLC is a limited liability company and wholly owned subsidiary servicing company of Ocwen Financial Corporation. It is located in Palm Beach, Florida. Ocwen Loan Servicing, LLC transacts or has transacted business in this district and throughout the United States.

JURISDICTION AND VENUE

7. 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 an agency of the United States, 28 U.S.C. § 1345.

8. Pursuant to 28 U.S.C. § 1367, this Court has supplemental jurisdiction over the subject matter of the claims asserted by the Plaintiff States in this action because those claims are so related to the claims asserted by the Bureau that they form part of the same case or controversy, and because those claims arise out of the same transactions or occurrences as the action brought by the Bureau under Sections 1031 and 1036(a) of the CFPA, 12 U.S.C. §§ 5531 and 5536(a).

9. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c) and 12 U.S.C. § 5564(f).

THE MORTGAGE SERVICING INDUSTRY

10. 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.

11. 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.

12. 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.

13. 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.

THE SERVICERS' MORTGAGE SERVICING MISCONDUCT

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

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

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

17. Ocwen specializes in default servicing where borrowers are more likely to encounter hardships or difficulties making payments. Ocwen also frequently acquires mortgage servicing rights through transfers, involving the acquisition of data, information, and documents retained by the prior servicer about borrowers' loans. In 2011 and 2012, respectively, Ocwen acquired and became the successor in interest to Litton and Homeward, and is liable for their illegal mortgage servicing and foreclosure processing conduct.

18. Ocwen 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. Ocwen personnel also frequently handle inquiries from borrowers whose loans have been transferred to Ocwen from another servicer.

19. Ocwen regularly reviews mortgage loans for potential loss mitigation or loan

modification options, and conducts or manages foreclosures.

20. In the course of their mortgage servicing activities, the Servicers have engaged in the following acts and practices:

a. failing to timely and accurately apply payments made by borrowers and failing to maintain accurate account statements;

b. charging unauthorized fees for default-related services;

c. imposing force-placed insurance when the Servicers knew or should have known that borrowers already had adequate coverage;

d. providing false or misleading information in response to borrower complaints;

e. providing false or misleading information to borrowers regarding loans that have been transferred from other servicers;

f. failing to provide accurate and timely information to borrowers who seek information about loss mitigation services, including loan modifications;

g. falsely advising borrowers that they must be at least 60 days delinquent in loan payments to qualify for a loan modification;

h. misrepresenting to borrowers that loss mitigation programs would provide relief from the initiation of foreclosure or further foreclosure efforts;

i. providing false or misleading information to consumers about the status of the loss mitigation review, including while referring loans to foreclosure;

j. providing false or misleading information to consumers about the status of foreclosure proceedings where the borrower was in good-faith actively pursuing a loss mitigation alternative offered by the Servicers;

k. failing to properly calculate borrowers' eligibility for loan modification programs and improperly denying loan modification relief to eligible borrowers;

l. failing to properly process borrowers' applications for loan modifications, including failing to account for documents submitted by borrowers and failing to respond to borrowers' reasonable requests for information and assistance, and as a result, denying loan modifications to consumers who were eligible;

m. providing false or misleading reasons for denial of loan modifications;

n. with respect to transferred loans, failing to honor in-process trial modifications agreed to by prior servicers;

o. with respect to transferred loans with in-process trial and permanent modifications, deceptively seeking to collect payments from the consumer under the mortgage's original unmodified terms;

p. preparing, executing, notarizing, and presenting false and misleading documents, filing false and misleading documents with courts and government agencies, or otherwise using false or misleading documents as part of the foreclosure process (including, but not limited to, affidavits, declarations, certifications, substitutions of trustees, and assignments); and

q. 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. This practice of repeated false attestation of information in affidavits is popularly known as "robosigning."

COUNT I

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

21. The allegations in paragraphs 1 through 20 above are incorporated herein by reference.

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

23. The Servicers' unlawful conduct has resulted in injury to the States and citizens of the States who have had home loans serviced by the Servicers. The harm sustained by such citizens includes payment of improper fees and charges, unreasonable delays and expenses to obtain loss mitigation relief, improper denial of loss mitigation relief, and loss of homes due to improper, unlawful, or undocumented foreclosures. The harm to the States includes the subversion of their legal process and the sustained violations of their laws. The States have had to incur substantial expenses in their investigations and attempts to obtain remedies for the Servicers' unlawful conduct.

COUNT II

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

24. The allegations in paragraphs 1 through 20 above are incorporated herein by reference.

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

26. The Servicers' unlawful conduct has resulted in injury to the States and citizens of the States who have had home loans serviced by the Servicers. The harm sustained by such citizens includes payment of improper fees and charges, unreasonable delays and expenses to obtain loss mitigation relief, improper denial of loss mitigation relief, and loss of homes due to improper, unlawful, or undocumented foreclosures. The harm to the States includes the subversion of their legal process and the sustained violations of their laws. The States have had to incur substantial expenses in their investigations and attempts to obtain remedies for the Servicers' unlawful conduct.

COUNT III

VIOLATIONS OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010 12 U.S.C. § 5481 ET SEQ. (CFPA) WITH RESPECT TO LOAN SERVICING

27. The allegations in paragraphs 1 through 20 above are incorporated herein by reference.

28. The loan servicing conduct of the Servicers, as described above, constitutes unfair and deceptive acts or practices in violation of Sections 1031(a) and 1036 of the CFPA, 12 USC §§ 5531(a) and 5536.

COUNT IV

VIOLATIONS OF THE CONSUMER FINANCIAL PROTECTION ACT OF 2010 12 U.S.C. § 5481 ET SEQ. (CFPA) WITH RESPECT TO FORECLOSURE PROCESSING

29. The allegations in paragraphs 1 through 20 above are incorporated herein by reference.

30. The foreclosure processing conduct of the Servicers, as described above, constitutes unfair and deceptive acts or practices in violation of Sections 1031(a) and 1036 of the

CFPA, 12 USC §§ 5531(a) and 5536.

PRAYER FOR RELIEF

WHEREFORE, the Bureau, pursuant to Sections 1054 and 1055 of the CFPA, 12 U.S.C. §§ 5564 and 5565, and the Plaintiff States, pursuant to their consumer protection laws, respectfully request that judgment be entered in their favor and against Ocwen for each violation charged in the complaint, and request that the Court:

A. Permanently enjoin Ocwen 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 Ocwen of unlawful gains;

D. Award the Bureau and the Plaintiff States the costs of bringing this action; and

E. Award additional relief as the Court may determine to be just and proper.

Dated: December 19, 2013

Respectfully submitted,

Attorneys for Plaintiff
Consumer Financial Protection Bureau

Lucy Morris
Deputy Enforcement Director
Consumer Financial Protection Bureau

s/ *Cara Petersen*
Cara Petersen
Assistant Litigation Deputy
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20552
cara.petersen@cfpb.gov
202-435-7493
DC Bar No. 476990

/s/ *Kirsten Ivey-Colson*
Kirsten Ivey-Colson
Enforcement Attorney
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20552
kirsten.ivey-colson@cfpb.gov
202-435-7354
DC Bar No. 470102

Date 12/10/13

For the State of Alabama:

Noel S. Barnes
Assistant Attorney General
501 Washington Avenue
PO Box 300152
Montgomery, Alabama 36130
nbarnes@ago.state.al.us
(334) 353-9196

Date 12/12/13

For the State of Alaska:

Cynthia C. Drinkwater
Sr. Assistant Attorney General
Alaska Department of Law
1031 W. 4th Avenue, Ste. 200
Anchorage, AK 99501
Cynthia.Drinkwater@alaska.gov
(907) 269-5200

Date 12/12/13

For the State of Arizona:

Jeremy Shorbe
Assistant Attorney General
400 W. Congress Street, Suite S315
Tucson, Arizona 85701
Jeremy.Shorbe@azag.gov
(520) 628-6504

Date 12/12/13

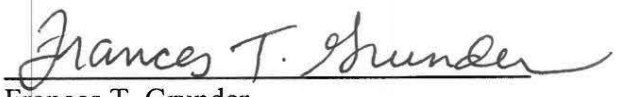
For the State of Arkansas:

/s James DePriest

James B. DePriest
Deputy Attorney General
323 Center Street, Suite 500
jim.depriest@arkansasag.gov
(501)682-5028

Date: December 12, 2013

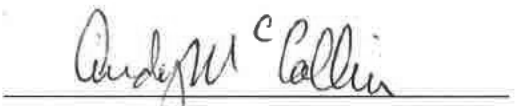
For the State of California:



Frances T. Grunder
Senior Assistant Attorney General
Office of the Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102
Frances.Grunder@doj.ca.gov
415-703-5500

Date: December 13, 2013

For the State of Colorado, *ex rel.*
John W. Suthers, Attorney General:



Andy McCallin
First Assistant Attorney General
Consumer Protection Section
Ralph L. Carr Colorado Judicial Center
1300 Broadway – 7th Floor
Denver, Colorado 80203
Andrew.McCallin@State.CO.US
(720) 508-6215

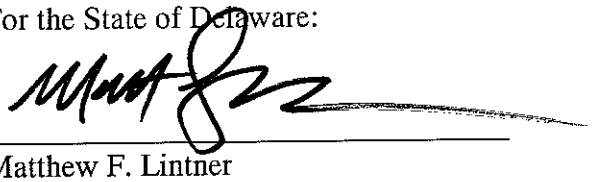
Date: December 12, 2013

For the State of Connecticut:

Joseph J. Chambers
Assistant Attorney General
P.O. Box 120
55 Elm Street
Hartford, CT 06141-0120
(860) 808-5270
joseph.chambers@ct.gov

Date: 12/13/13

For the State of Delaware:



Matthew F. Lintner
Director, Fraud and Consumer Protection Div.
820 N. French Street, 5th Floor
Wilmington, DE 19801
Matthew.Lintner@state.de.us
(302) 577-8935

December 16th, 2013.

For the State of Florida:

Pamela Jo Bondi
Attorney General
The Capitol PL-01
Tallahassee, FL 32399-1050
Tel: 850-245-0140
Fax: 850-413-0632

Office of the Attorney General

Victoria A. Butler
Assistant Attorney General
Bureau Chief
Michael G. Moore
Senior Assistant Attorney General
Tampa, Consumer Protection Division
Office of the Attorney General, Pam Bondi
3507 E. Frontage Road, Suite 325
Tampa, FL 33607
Tel: 813-287-7950
Fax: 813-281-5515

Date December 16, 2013

For the State of Georgia:

Jeffrey W. Stump
Senior Assistant Attorney General
Georgia Department of Law
40 Capitol Square, SW
Atlanta, Georgia 30334
jstump@law.ga.gov
(404) 656-3337

Date 12/11/13

For the State of Hawaii:

Deborah Day Emerson
Supervising Deputy Attorney General
425 Queen Street, Honolulu HI 96813
Deborah.D.Emerson@Hawaii.Gov
(808) 586-1180

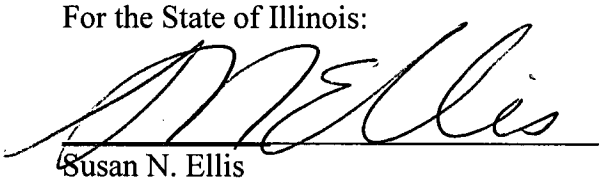
Date 12-10-13

For the State of Idaho

Stephanie Guyon (Idaho Bar No. 5989)
Deputy Attorney General
P.O. Box 83720
Boise, ID 83720-0010
stephanie.guyon@ag.idaho.gov
(208) 334-4135

Date 12/10/13

For the State of Illinois:



Susan N. Ellis
Bureau Chief, Consumer Fraud
Office of the Illinois Attorney General
100 West Randolph Street
Chicago, IL 60601
sellis@atg.state.il.us
312-814-3000

Date 12-11-13

For the State of Indiana:

ABIGAIL LAWLIS KUZMA
Director and Chief Counsel
Consumer Protection Division
Indiana Office of the Attorney General
302 West Washington St., IGCS 5th Fl.
Abigail.Kuzma@atg.in.gov
Tel: 317-234-6843

Date: 12/17/13

For the State of Iowa:

Patrick Madigan

Patrick Madigan
Assistant Attorney General
Iowa Attorney General's Office
1305 East Walnut Street
Des Moines, IA 50319
Patrick.Madigan@Iowa.gov
(515) 281-5926

Date 12/13/13

For the State of Kansas:

Meghan E. Stoppel
Assistant Attorney General
Office of the Kansas Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612
Meghan.Stoppel@ksag.org
(785) 296-3751

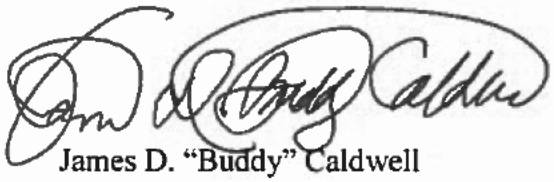
Date 12-10-2013

For the Commonwealth of Kentucky:

Jack Conway
Attorney General of Kentucky
700 Capital Avenue, Suite 118
Frankfort, KY 40601
susan.britton@ag.ky.gov
502-696-5643

Date: December 13, 2013

For the State of Louisiana:



James D. "Buddy" Caldwell
Louisiana Attorney General
Post Office Box 94005
Baton Rouge, Louisiana 70804-9005
E-mail: Caldwellb@ag.state.la.us
Phone Number: 225-326-6705

Date 12/12/13

For the State of Maine

LINDA J. CONTI
Assistant Attorney General
Office of the Attorney General
6 State House Station
Augusta, Maine 04333-0006
Linda.conti@maine.gov
(207) 626-8591

Date December 13, 2013

For the State of Maryland:

Lucy A. Cardwell

Lucy A. Cardwell
Assistant Attorney General
Consumer Protection Division
Office of the Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202
lcardwell@oag.state.md.us
410-576-6337

Date December 17, 2013

For the Commonwealth of Massachusetts:

Glenn S. Kaplan
Assistant Attorney General
One Ashburton Place, 18th Floor
Boston, MA 02108
Glenn.Kaplan@state.ma.us
617-963-2453
D.C. Bar No. 429052

Date 12-13-13

For the State of Michigan:

D.J. Pascoe
Assistant Attorney General
Corporate Oversight Division
P.O. Box 30755
Lansing, MI 48909
pascoed1@michigan.gov
(517) 373-1160

Date: December 13, 2013

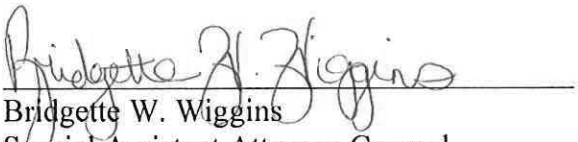
For the State of Minnesota:

LORI SWANSON
Attorney General
State of Minnesota

NATHAN BRENNAMAN
Deputy Attorney General
445 Minnesota Street, Suite 1200
St. Paul, Minnesota 55101-2130
nate.brennaman@ag.state.mn.us
(651) 757-1415 (Voice)

Date: December 12, 2013

For the State of Mississippi:



Bridgette W. Wiggins
Special Assistant Attorney General
Consumer Protection Division
Post Office Box 22947
Jackson, MS 39225
bwill@ago.state.ms.us
(601) 359-4279

Date 12/10/2013

For the State of Missouri:

Ryan S. Asbridge

Ryan S. Asbridge
Assistant Attorney General
P.O. Box 899, Jefferson City, MO 65102
ryan.asbridge@ago.mo.gov
573-751-7677

Date: December 12, 2013

For the State of Montana:

Chuck Munson
Assistant Attorney General
215 N. Sanders
P.O. Box 201401
Helena, MT 59620
cmunson@mt.gov
(406) 444-2026

Date December 13, 2013

For the State of Nebraska:

Abigail M. Stempson

Abigail M. Stempson
Assistant Attorney General
Chief, Consumer Protection Division
2115 State Capitol
Lincoln, NE 68509-8920
abigail.stempson@nebraska.gov
(402) 471-2683

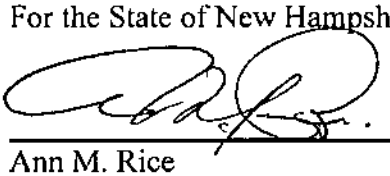
Date 12/13/13

For the State of Nevada:

Kristine M. Kuzemka
Senior Deputy Attorney General
555 E. Washington Avenue, Suite 3900
kkuzemka@ag.nv.gov
(702) 486-3420

Date Dec. 12, 2013

For the State of New Hampshire:



Ann M. Rice
Deputy Attorney General
33 Capitol Street, Concord, NH 03301
Ann.Rice@doj.nh.gov
603-271-1238

Date: December 12, 2013

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: _____

Lorraine K. Rak
Deputy Attorney General
Chief, Consumer Fraud Prosecution Section

124 Halsey Street – 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Lorraine.Rak@dol.lps.state.nj.us
(973) 877-1280

Date 12/13/13

For the State of New Mexico

Gary K. King
Attorney General
408 Galisteo Street
Santa Fe, NM 87501
Gking@nmag.gov
(505) 827-5843

December 10, 2013

For the State of New York



Jane M. Azia
Bureau Chief
Bureau of Consumer Frauds & Protection
Office of the New York State Attorney General
120 Broadway
New York, NY 10271
Jane.azia@ag.ny.gov
(212) 416-8727

December 11, 2013

For the State of North Carolina:

Phillip K. Woods
Special Deputy Attorney General
114 West Edenton Street
Raleigh, NC 27602-0629
Email: pwoods@ncdoj.gov
Telephone: (919) 716-6052

Date December 10, 2013

For the State of North Dakota

Parrell D. Grossman (NDBI #04684)
Assistant Attorney General
Director, Consumer Protection & Antitrust Division
Office of Attorney General
Gateway Professional Center
1050 East Interstate Ave. Ste. 200
Bismarck, ND 58503-5574
pgrossman@nd.gov
(701)328-5570

Date: December 11, 2013

For the State of Ohio

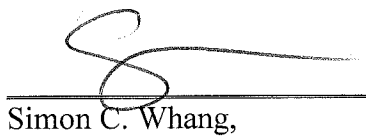
MIKE DeWINE
The Attorney General of Ohio

MATTHEW J. LAMPKE (0067973)
Mortgage Foreclosure Counsel
30 East Broad Street, 15th Floor
Columbus, Ohio 43215
(614) 466-8569 - Telephone
(866) 403-3979 - Facsimile
Matthew.Lampke@OhioAttorneyGeneral.gov

Trial Counsel for Ohio

Date 12/12/2013

For the State of Oregon:



Simon C. Whang,
Assistant Attorney General
Financial Fraud/Consumer Protection Sectn.
Oregon Department of Justice
1515 SW Fifth Ave Ste 410
Portland, OR 97201
simon.c.whang@doj.state.or.us
971-673-1880

Date 12.13.13

For the Commonwealth of Pennsylvania
KATHLEEN G. KANE, Attorney General:

John M. Abel
Senior Deputy Attorney General
Pennsylvania Office of Attorney General
Bureau of Consumer Protection
15th Floor, Strawberry Square
Harrisburg, PA 17120
jabel@attorneygeneral.gov
Tel: 717-783-1439
Fax: 717-705-3795

December 13, 2013

For the State of Rhode Island:

Edmund F. Murray, Jr.
Special Assistant Attorney General
Rhode Island Department of Attorney General
150 South Main Street
Providence, Rhode Island 02903
(401) 274-4400 ext. 2401
emurray@riag.ri.gov

Date 12/13/13

For the State of South Carolina:

C. Havird Jones, Jr.
Assistant Deputy Attorney General
PO Box 11549
Columbia, SC, 29211
SJones@scag.gov
803-734-3654

Date: December 10, 2013

On Behalf of the State of South Dakota:

MARTY J. JACKLEY
ATTORNEY GENERAL



Bethanna M. Feist
South Dakota Attorney General's Office
1302 E. Highway 14, Suite 1
Pierre, SD 57501-8501
Telephone: (605) 773-3215
Facsimile: (605) 773-4106
Email: Bethanna.Feist@state.sd.us

Date: 12/13/13

For the State of Tennessee:



Robert E. Cooper, Jr.
Attorney General and Reporter
Office of the Tennessee Attorney General
425 Fifth Avenue North
Nashville, Tennessee 37243-3400
bob.cooper@ag.tn.gov
(615) 741-3491
DC Bar No. 393721 (inactive)

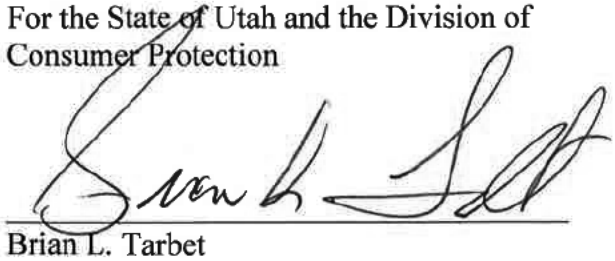
Date December 13, 2013

For the State of Texas:

James A. Daross
Regional Managing Attorney
Consumer Protection Division
Office of the Attorney General of Texas
401 E. Franklin Ave., Suite 530
El Paso, Texas 79901
james.daross@texasattorneygeneral.gov
915-834-5801 (Direct)
915-834-5800 (Main)
915-542-1546 (FAX)
Texas Bar No. 05391500

Date December 16, 2013

For the State of Utah and the Division of Consumer Protection



Brian L. Tarbet
Utah Attorney General (Acting)
350 North State Street, Suite 230
Salt Lake City, Utah 84114
btarbet@utah.gov
(801) 538-1191

Date 12/10/13

For the State of Vermont:

Elliot Burg
Assistant Attorney General
Vermont Attorney General's Office
109 State Street
Montpelier, VT 05609
eburg@atg.state.vt.us
(802) 828-2153

Date December 12, 2013

For the COMMONWEALTH of VIRGINIA,
EX REL. KENNETH T. CUCCINELLI, II,
ATTORNEY GENERAL:

DAVID B. IRVIN (VSB #23927)
Senior Assistant Attorney General
MARK S. KUBIAK (VSB #73119)
Assistant Attorney General
Office of Virginia Attorney General
900 East Main Street
Richmond, Virginia 23219
Telephone: 804-786-4047

Date 12/10/2013

STATE OF WASHINGTON
ROBERT W. FERGUSON
ATTORNEY GENERAL

DAVID W. HUEY, WSBA # 31380
Senior Counsel
1250 Pacific Avenue, Suite 105
PO Box 2317
Tacoma, WA 98401-2317
DavidH3@atg.wa.gov
(253)593-5057

Date 12/13/2013

For the State of West Virginia

Patrick Morrisey

Patrick Morrisey, Attorney General
State Capitol Bldg. 1, Room 26-E
Charleston, WV 25305-0220
Patrick.J.Morrisey@wvago.gov
304-558-2021

Date 12-11-13

For the State of Wisconsin:

J.B. VAN HOLLEN
Attorney General



HOLLY C. POMRANING
Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
Email: pomraninghc@doj.state.wi.us
Tel: 608-266-5410

Date 12/10/13

For the State of Wyoming:

Peter K. Michael
Attorney General
123 Capitol Building
Cheyenne, WY 82002
Peter.michael@wyo.gov
(307) 777-7841

Dated: December 11, 2013

Respectfully submitted,

IRVIN B. NATHAN
Attorney General for the District of Columbia

ELLEN A. EFROS
Deputy Attorney General
Public Interest Division

BENNETT RUSHKOFF (D.C. Bar #386925)
Chief, Public Advocacy Section

GARY M. TAN (D.C. Bar # 987796)
Assistant Attorney General
Office of the Attorney General
441 4th Street, N.W., Suite 600 South
Washington, DC 20001
Telephone: (202) 727-6241
Email: Gary.Tan@dc.gov

Attorneys for the District of Columbia