UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA and CONSUMER FINANCIAL PROTECTION BUREAU,	)	
Plaintiffs,	)	Civil Action No.: 2:21-cv-2664
v.	)	
TRUSTMARK NATIONAL BANK,	)	
Defendant.	)	

UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT TO TERMINATE CONSENT ORDER AND DISMISS WITH PREJUDICE

Plaintiffs the United States of America ("United States") and the Consumer Financial Protection Bureau ("Bureau"), by and through undersigned counsel, file this unopposed motion to provide the Court with a status update and to respectfully request termination of the Consent Order and dismissal of this case with prejudice.

The Court entered a Consent Order in this case on October 27, 2021 (ECF 26) ("Consent Order"). The Consent Order states that its requirements will remain in effect for five (5) years or longer if Trustmark National Bank ("Trustmark") has not invested all money required by the Consent Order. (*Id.* ¶¶ 55-56). The Consent Order also states that other modifications may be made upon approval of the Court, by motion by any Party, and that the Parties will work cooperatively to propose modifications if there are changes in material factual circumstances. (*Id.* ¶ 59).

In support of this motion, Plaintiffs advise the Court that Trustmark has demonstrated a commitment to remediation, and:

1. Trustmark has fully disbursed the loan subsidy fund ($3,850,000) as required under the terms of the Consent Order (*see id.* ¶ 22);
2. Trustmark paid a $5,000,000 civil money penalty as required under the terms of the Consent Order, of which $1,000,000 was paid to the Bureau and $4,000,000 was remitted after Trustmark paid that amount to the Office of the Comptroller of the Currency ("OCC") as satisfaction of its obligation to pay that amount in penalties to the OCC for related conduct (see id. ¶ 41); and
3. Trustmark is substantially in compliance with the other monetary and injunctive terms of the Consent Order.

We have conferred with counsel for Trustmark, and the entity does not oppose the motion.

WHEREFORE, for these reasons, Plaintiffs respectfully request that the Court enter the attached Proposed Order terminating the Consent Order and dismissing this case with prejudice.

Respectfully submitted this 20th day of May 2025.

For the United States of America:

JOSEPH C. MURPHY, JR.
Interim United States Attorney
Western District of Tennessee

/s/ *Eileen Kuo*
EILEEN KUO (TN Bar No. 027365)
Assistant United States Attorney

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division

CARRIE PAGNUCCO
Chief

VARDA HUSSAIN
Principal Deputy Chief

/s/ *Marta Campos*
MARTA CAMPOS (pro hac vice)
Trial Attorney

United States Attorney's Office
Western District of Tennessee
167 North Main Street, Suite 800
Memphis, TN 38103
Phone: (901) 544-4231
Fax: (901) 544-4230
eileen.kuo@usdoj.gov

Housing & Civil Enforcement Section
950 Pennsylvania Ave. NW – 4CON
Washington, DC 20530
Phone: (202) 514-4713
Fax: (202) 514-1116
Marta.Campos@usdoj.gov

For the Consumer Financial Protection Bureau:

MARK PAOLETTA
Chief Legal Officer

VICTORIA DORFMAN
Senior Legal Advisor

CARA PETERSEN
Acting Enforcement Director

DAVID RUBENSTEIN
Deputy Enforcement Director

/s/ *Jonathan Reischl*
JONATHAN REISCHL
JEFFREY BLUMBERG
Enforcement Attorneys
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552
Phone: (202) 435-9202
jonathan.reischl@cfpb.gov
jeffrey.blumberg@cfpb.gov

CERTIFICATE OF CONSULTATION

I certify that on May 20, 2025, I consulted with Defendant's counsel regarding this motion and Defendant's counsel does not oppose the relief requested herein.

/s/ Marta Campos
Marta Campos

CERTIFICATE OF SERVICE

I certify that on May 20, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filings to all counsel of record.

/s/ Eileen Kuo
Eileen Kuo