



STATE OF CALIFORNIA
OFFICE OF THE ATTORNEY GENERAL
ROB BONTA



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL
LETICIA JAMES



STATE OF WASHINGTON
OFFICE OF THE ATTORNEY GENERAL
BOB FERGUSON

September 9, 2024

VIA ELECTRONIC SUBMISSION

Rohit Chopra
Director, Consumer Financial Protection Bureau
1700 G Street N.W.
Washington, DC 20552

**Re: Proposed Rule Regarding Streamlining Mortgage Servicing for Borrowers Experiencing Payment Difficulties (Regulation X)
Docket No. CFPB-2024-0024**

Dear Director Chopra:

The undersigned Attorneys General of Arizona, California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Illinois, Maine, Maryland, Massachusetts, Nevada, New Jersey, New York, North Carolina, Oregon, Pennsylvania, Vermont, and Washington submit the following comments on the Consumer Financial Protection Bureau’s (CFPB) Proposed Rule, “Streamlining Mortgage Servicing for Borrowers Experiencing Payment Difficulties; Regulation X” (Docket No. CFPB-2024-0024) (hereinafter the “Proposed Rule”).¹

The Proposed Rule provides a new and updated framework through which mortgage servicers may evaluate borrowers for loss mitigation options. In doing so, it addresses many of the challenges currently experienced by borrowers who have suffered financial hardship and seek assistance in meeting their mortgage obligations. Our states commend the CFPB for proposing a

¹ The CFPB published the Proposed Rule and Request for Public Comment on July 10, 2024 with a comment closing date of September 9, 2024. *See* 89 FR 60204. Citations to the Request for Public Comment in this letter refer to the page numbers in the PDF issued by CFPB with its announcement. *See* https://files.consumerfinance.gov/f/documents/cfpb_mortgage-servicing-nprm-proposed-rule_2024-07.pdf.

loss mitigation framework that prioritizes earlier foreclosure safeguards for struggling borrowers, increases transparency regarding the loss mitigation process as it relates to individual mortgage loans through notices more tailored to borrowers, prevents the accrual of certain fees during loss mitigation review, and establishes vital requirements to expand language access to mortgage assistance for borrowers with limited English proficiency. Drawing upon our experience enforcing consumer protection statutes, we also offer recommendations to the Proposed Rule that would ensure that all consumers are afforded a fair opportunity to access loss mitigation if they suffer a financial setback that puts them at risk of foreclosure.

Background

Our states recognize the important role that the CFPB plays in ensuring the fair and transparent servicing of mortgage loans across the nation. Enforcement of consumer protection statutes and promulgation of regulations responsive to changes in industry practice and market conditions are particularly important in sectors such as mortgage servicing. Because the assignment of servicing rights is at the sole discretion of the lender, market forces have a limited effect on incentivizing loan servicers to respond to consumer concerns. Simply put, a borrower unhappy with their mortgage servicer cannot simply take their business elsewhere.

Current laws and regulations governing mortgage servicing, including Regulation X, reflect the efforts of both state and federal actors to protect consumers facing mortgage distress and shield communities from the damage wrought by unnecessary foreclosures. Most were promulgated and/or amended in direct response to the 2008 foreclosure crisis and subsequent recession. During the foreclosure crisis, historic numbers of borrowers were unable to afford their mortgage payments, often because their mortgage rate adjusted upwards just as their property values plummeted, thereby putting them at risk of foreclosure.² Mortgage servicers, having never been faced with defaults of this magnitude, were unprepared for the crisis and lacked systems for timely assessing loans for loss mitigation options.³ As a result, borrowers were faced with limited and inconsistent access to mortgage assistance, and many homes were lost to preventable foreclosures.⁴

The mortgage servicing failures endemic during the Great Recession gave rise to both federal and state action to protect borrowers. The U.S. Department of Treasury implemented the Making Home Affordable (MHA) program, which provided standardized procedures for

² Christian W. Hancock & Tom Mostellar, Mortgage Loan Loss Mitigation Options and New Challenges in Today's Rising Interest Rate Environment, 77 Consumer Fin. L.Q. Rep. 165, 167 (2023).

³ William W. Bratton & Adam J. Levitin, A Tale of Two Markets: Regulation and Innovation in Post-Crisis Mortgage and Structured Finance Markets, 2020 U. Ill. L. Rev. 47, 65 (2020).

⁴ Id.

reviewing loans for loss mitigation, including permanent loan modifications, beginning in 2009.⁵ In 2012, 51 Attorneys General entered into the National Mortgage Settlement with the five largest mortgage servicers in the country. In addition to providing \$50 billion in relief funds to distressed mortgage borrowers, these settlement agreements established additional consumer protections to improve transparency and communication during the loss mitigation process and prevent unnecessary foreclosures.⁶ The following year, the CFPB amended Regulation X (the “2013 Rule”).⁷ As the CFPB notes, the 2013 Rule built on the MHA program and National Mortgage Settlement, and required mortgage servicers to establish loss mitigation procedures. Specifically, it required servicers to obtain a complete loss mitigation application from any borrower seeking assistance, and set forth detailed timelines by which servicers must evaluate the application and communicate their decisions and instructions for further action.⁸ A number of states also enacted or strengthened state laws to protect homeowners facing foreclosure, including California’s Homeowner Bill of Rights, New York’s Mortgage Servicing Regulations, and Washington’s Foreclosure Fairness Act.⁹

The CFPB now proposes to amend Regulation X’s current framework, to allow for a more streamlined loss mitigation process that provides mortgage servicers greater flexibility in assessing borrowers for loss mitigation options and simplifies the application and review process for borrowers in need of assistance. As Attorneys General responsible for the enforcement of consumer protection statutes within our states, we draw upon our extensive experience with mortgage servicing issues in submitting these comments supporting the Proposed Rule and offering recommendations to make it more effective.

The Proposed Rule Establishes Key Protections For Borrowers While Providing Greater Flexibility For Loss Mitigation

As the CFPB acknowledges in its Proposed Rule, the mortgage landscape is very different today than it was in the immediate aftermath of the foreclosure crisis. At the time the 2013 Rule was implemented, the mortgage servicing market was dominated by loans that originated prior to the 2008 foreclosure crisis, many of which featured adjustable interest rates

⁵ U.S. Dep’t of Treas., Making Home Affordable (MHA), <https://home.treasury.gov/data/troubled-assets-relief-program/housing/mha> (last visited August 18, 2024).

⁶ <http://www.nationalmortgagesettlement.com/settlement-documents.html> (last visited August 18, 2024).

⁷ 78 FR 10696 (Feb. 14, 2013).

⁸ 12 C.F.R. §§ 1024.41(b), 1024.41(c), 1024.41(h).

⁹ Cal Civ. Code §§ 2923.4, et seq.; N.Y. Comp. Codes R. & Regs. tit. 3, § 419.7 (2019); RCW 61.24.031, et seq.

and/or payment structures that stepped up over time.¹⁰ Borrowers facing payment difficulties today are much more likely to have a loan with an interest rate at or near the current prime rate.¹¹ Further, rising interest rates in recent years have increased the cost of lending, making it difficult for mortgage servicers and borrowers to negotiate permanent loan modifications by simply reducing the interest rate of a loan.¹² In light of these market conditions, we support the Proposed Rule's shift to a more streamlined framework that provides greater flexibility to mortgage servicers in offering loss mitigation options.

Given the varied landscape of loss mitigation options available to borrowers today, early intervention and clear communication with borrowers struggling to meet their payment obligations are more important than ever. Borrowers must be able to understand the loss mitigation options available to them and be accurately reviewed for all available loss mitigation options without undue delay and without accruing unnecessary fees that compound their payment difficulties. To that end, the undersigned Attorneys General commend the CFPB for proposing to prioritize earlier foreclosure safeguards, increase transparency, restrict delinquency-related fees, and provide for increased language access for borrowers with limited English proficiency throughout the loss mitigation process.

Our constituents facing mortgage distress report that the accrual of fees is one of the most significant barriers to resolving a delinquency arising from a temporary financial setback. The Proposed Rule's prohibition on the charging of fees during the loss mitigation review process provides a critical protection that will substantially promote successful loss mitigation outcomes and prevent avoidable foreclosures.¹³ Likewise, the Proposed Rule's requirement that Early Intervention Notices include the owner or assignee of the mortgage loan and a list of all loss mitigation options that may be available from the owner or assignee of the borrower's loan provides much-needed transparency at the outset of the loss mitigation process.¹⁴

We further enthusiastically support the Proposed Rule's inclusion of language access requirements to assist borrowers with limited English proficiency. As the CFPB notes in its Proposed Rule, borrowers with limited English language proficiency frequently encounter significant difficulty in communicating with servicers during the early intervention and loss mitigation processes.¹⁵ Such communication difficulties contribute to missed information,

¹⁰ Christian W. Hancock & Tom Mostellar, Mortgage Loan Loss Mitigation Options and New Challenges in Today's Rising Interest Rate Environment, 77 Consumer Fin. L.Q. Rep. 165, 167-168 (2023).

¹¹ Id. at 175-177.

¹² Id.

¹³ See Proposed Rule 12 C.F.R. § 1024.41(f)(3).

¹⁴ See Proposed Rule 12 C.F.R. § 1024.39(b)(2)(iii).

¹⁵ Proposed Rule at pp. 78-80.

confusion, and delays that result in greater loan delinquencies and limit borrowers' available loss mitigation options. Providing borrowers with reliable translation services will reduce the burden of seeking mortgage assistance while also improving outcomes by helping borrowers better understand the loss mitigation process to avoid foreclosure.

The Proposed Rule requires servicers to provide Spanish-language translations of certain written communications, including Early Intervention Notices, notices to borrowers of upcoming ends to forbearances, and required loss mitigation notices.¹⁶ Servicers would also be required to select five additional languages that a significant majority of their non-Spanish speaking borrowers with limited English proficiency use, and notify borrowers that translation and interpretation of certain loss mitigation communications are available in those languages.¹⁷ Upon request, servicers would be required to provide such translations and interpretation services.¹⁸

The Proposed Rule is a strong step towards providing borrowers with limited English proficiency greater access to the early intervention and loss mitigation processes necessary to avoid preventable foreclosures. In particular, we believe the Proposed Rule's requirement that servicers provide translation and interpretation services in five non-Spanish languages appropriately balances the need to make loss mitigation services more accessible with the cost to servicers of doing so. We would also support future rulemaking to expand the types of communications covered by the language access requirements (e.g., notice of transfer of loan servicing) and increase the number of required languages for translation and interpretation.¹⁹

Recommendations For Strengthening The Proposed Rule

While the undersigned Attorneys General strongly support the Proposed Rule, we offer the following recommendations to further the goals of preventing avoidable foreclosures and ensuring that borrowers facing mortgage distress are able to avail themselves of mortgage assistance without unnecessary hurdles.

1. The Proposed Rule Should Provide For Additional Loss Mitigation Review Cycles

The undersigned Attorneys General are concerned that the Proposed Rule does not provide sufficient protection for borrowers who are denied all loss mitigation options but subsequently undergo a material change in their financial circumstances, such as regaining employment.²⁰ The CFPB proposes to amend Section 1024.41(i) to create a new framework based on a loss mitigation review cycle rather than requiring a complete loss mitigation

¹⁶ Proposed Rule at pp. 84-85.

¹⁷ Proposed Rule at pp. 87-90.

¹⁸ Proposed Rule at pp. 86-90.

¹⁹ See Proposed Rule at p. 83.

²⁰ See 12 C.F.R. § 1024.41(i).

application before any options are reviewed. However, the amendments do not require a servicer to comply with Regulation X's loss mitigation procedures once a servicer has completed one loss mitigation review cycle within a single period of delinquency.

For example, if a borrower requested loss mitigation assistance immediately after losing their job, but was denied all loss mitigation options, the loss mitigation review cycle as defined in the Proposed Rule would be complete because no loss mitigation options remain, and the servicer could proceed with the foreclosure process. If three months later, the borrower obtained new employment at an increased salary, thereby making them an excellent candidate for a loan modification, the Proposed Rule would neither require that their mortgage servicer review them again for loss mitigation options nor protect them against foreclosure or the accrual of fees during such review if it does take place. Indeed, the Proposed Rule does not expressly require the servicer to reconsider them for a modification even if the loss mitigation cycle was still open at the time they regained employment.²¹ We recommend amending the Proposed Rule to require servicers to re-review previously denied options due to changed circumstances at the request of the borrower.

In its notice of proposed rulemaking, the CFPB acknowledges that the existing Section 1024.41(i) “can result in borrowers being denied access to loss mitigation options because they were not eligible at the time of application completion even though they become newly eligible after application” due to a change in financial circumstances.²² Although the CFPB indicates that it expects the Proposed Rule “would provide borrowers with increased opportunities to finalize a loss mitigation option successfully and to become current,” we are concerned that the Proposed Rule could leave borrowers who request loss mitigation assistance immediately upon experiencing a financial setback vulnerable to unnecessary loss mitigation denials if their circumstances improve after servicers evaluated them for all available options.

We strongly urge the CFPB to amend the Proposed Rule to allow for subsequent loss mitigation review cycles for borrowers who can demonstrate materially changed circumstances after the denial of loss mitigation options. Requiring subsequent loss mitigation review cycles under these circumstances would acknowledge the reality that—while early intervention is critical in avoiding unnecessary foreclosures—many borrowers struggling to make their mortgage payments need time to recover from a job loss or other financial challenge.

2. The Proposed Rule Should Specify Certain Timelines For Acknowledging Receipt And Reviewing Loss Mitigation Requests

The undersigned Attorneys General recommend that the CFPB amend the Proposed Rule to provide for specific timelines under which servicers must respond to a borrower's request for loss mitigation assistance. As it is currently written, the Proposed Rule eliminates timeframes

²¹ In its notice of proposed rulemaking, the CFPB “encourages servicers to re-review a borrower for an option for which the borrower was previously denied during the same loss mitigation review cycle” but does not explicitly require servicers to do so. Proposed Rule at p. 40.

²² Proposed Rule at p. 113.

related to a mortgage servicer's review of borrowers' requests for loss mitigation assistance and related notice requirements. In lieu of these deadlines, the Proposed Rule bars mortgage servicers from charging certain fees or advancing foreclosure activity during a loss mitigation review cycle, and relies upon these prohibitions to incentivize mortgage servicers to respond to borrowers in a timely fashion.

We strongly support the Proposed Rule's prohibition of dual-tracking and charging of fees during a loss mitigation review cycle. We are, however, concerned that a market incentive to respond to a borrower's request for loss mitigation may not always be sufficient to protect borrowers and promote early intervention to avoid foreclosures. In the past, our offices have become aware of widespread delays in loss mitigation reviews during periods of unusually high incidence of default. Delays may also occur during the transfer of servicing rights from one servicer to another, or if there is a change in the ownership of the mortgaged property due to death or divorce. In these and other circumstances, the lack of enforceable timeframes for a mortgage servicer to identify and obtain necessary information from the borrower, evaluate the borrower for loss mitigation options, and make a loss mitigation determination, may lead to undue delay and increase the interest accruing on the account, thus making it harder to resolve a borrower's delinquency.

Given these possibilities and the urgent need of struggling borrowers to have clear communication regarding their loss mitigation options, we recommend including two specific time requirements for responding to borrowers' requests for loss mitigation assistance. First, we recommend that the Proposed Rule be amended to require servicers to acknowledge receipt of a borrower's request for loss mitigation assistance within five days. This initial response should include a copy of the Early Intervention Notice required under 12 C.F.R. § 1024.39(b)(2), if applicable, as well as a notice in plain language informing the borrower of any additional information needed to begin to review the borrower for available loss mitigation options. Second, we recommend that the Proposed Rule require that servicers render an initial decision on the borrower's request for loss mitigation assistance within 30 days of receiving the information needed from the borrower to evaluate the request.

Finally, in describing a servicer's obligation to identify and obtain missing information or otherwise communicate with a borrower, the Proposed Rule uses the phrase "regularly taken steps."²³ Regulation X currently requires servicers to "exercise reasonable diligence" in obtaining documents or communicating with borrowers.²⁴ We recommend that the Proposed Rule be amended to retain the "reasonable diligence" standard rather than replacing it with "regularly taken steps," as it is a more clear legal standard. If the CFPB opts to use "regularly taken steps," we recommend that it provide examples of such steps in the Official Commentary or other source to provide guidance to both mortgage servicers and consumers as to its meaning.

²³ Proposed Rule 12 C.F.R. §§ 1024.41(c)(2)(ii), 1024.41(f)(2)(ii).

²⁴ See, e.g., 12 C.F.R. §§ 1024.41(b)(1); 1024.41(c)(2)(ii), 1024.41(c)(4)(1).

3. The Proposed Rule Should Be Amended To Ensure That Borrowers Are Able To Access All Loss Mitigation Options Available To Them

Finally, the undersigned Attorneys General recommend that the CFPB implement additional measures to ensure borrowers fully understand all of the loss mitigation options available to them. While we understand that the Proposed Rule is intended to allow servicers to offer borrowers loss mitigation options more quickly, we believe that additional safeguards are needed to ensure that borrowers are made aware of all loss mitigation options and can make fully informed decisions as to whether to accept a given offer.

First, the Proposed Rule should be clarified to require that the loss mitigation information included in the Early Intervention Notice, pursuant to Section 1024.39(b)(2)(ii), accurately reflects the potentially available loss mitigation options for the borrower's specific loan.²⁵ For example, if the owner or investor on a given loan does not offer deeds in lieu of foreclosure, the Early Intervention Notice should not list deeds in lieu of foreclosure as a potential loss mitigation option.

Second, the Proposed Rule should be amended to require that mortgage servicers provide all loss mitigation communications in simple, plain language and format that allows even unsophisticated borrowers to clearly understand their loss mitigation options and next steps in the process. We are concerned that the Proposed Rule's existing requirement that mortgage servicers provide detailed loss mitigation determination notices for all types of loss mitigation options may overwhelm and cause confusion for borrowers.²⁶ Although we appreciate the CFPB's intent to help borrowers better understand their loss mitigation determinations, it is critical that this information be presented in a way that all borrowers—including those with limited English proficiency relying on translations or interpretation of the materials—be able to easily discern what determinations have been made and what additional options remain under review. We also recommend that the required notices and information be tailored to each borrower, as opposed to a form letter or generic language that may not apply to their individual situations, which can lead to confusion.

Third, the Proposed Rule should be amended to require servicers to hold offers open when reviewing borrowers for loss mitigation options sequentially.²⁷ For example, if a borrower

²⁵ See Proposed 12 C.F.R. § 1024.39(b)(2)(ii).

²⁶ See Proposed 12 C.F.R. § 1024.41(c) (requiring that the loss mitigation determination notices include, among other information, the specific reason(s) for the determination to offer or deny each loss mitigation option; key borrower inputs that served as the basis for the determination; a list of loss mitigation options that may still be available to the borrower, if any; and, if a loss mitigation option was offered, a statement of whether the offer option will still be available if the borrower requests to be reviewed for other options).

²⁷ We acknowledge that there may be some loss mitigation offers that cannot be held open for significant periods of time without requiring the borrower to partially perform under them, due to the accrual of interest on the loan, changing interest rates, or other factors.

is offered either a repayment plan or deed in lieu of foreclosure, but has not yet been reviewed for a loan modification, both of these offers should be held open while the servicer reviews the borrower for a loan modification. We are particularly concerned that borrowers may feel pressured to take certain non-retention loss mitigation options, such as a “cash for keys” or deed in lieu of foreclosure, out of fear that they might lose the initial offer, before they are reviewed for other loss mitigation and can weigh both the home-saving and non-retention options available to them.

Interplay of Regulation X and State Laws and Regulations

Finally, as discussed above, both federal agencies and states play critical roles in regulating mortgage servicing and ensuring consumers have meaningful access to loss mitigation that prevents avoidable foreclosures. Several states, including California,²⁸ New York,²⁹ and Washington,³⁰ have promulgated laws and regulations setting forth standards for mortgage servicing. Many of these laws and regulations dovetail with the 2013 Rule. For example, New York’s Mortgage Servicing Regulations include requirements that a servicer receiving a loss mitigation application more than 45 days before a foreclosure sale must acknowledge receipt of the application within five business days,³¹ and must evaluate a complete loss mitigation application within 30 days.³² These requirements closely mirror the obligations of servicers under the 2013 Rule.³³

Additional state statutes provide for further protections for homeowners facing foreclosure. For example, in New York, mortgage servicers must engage in good faith settlement conferences upon the filing of residential foreclosure complaints to determine if the parties can reach a mutually agreeable resolution to help the borrower avoid losing their home.³⁴ As another example, California’s Homeowner Bill of Rights prohibits mortgage servicers from proceeding with foreclosure if a borrower submits a complete loan modification application at least five business days before a scheduled foreclosure sale, requires large servicers to review subsequent loan modification applications if there has been a material change in the borrower’s financial circumstances since the borrower previously applied for assistance, and provides borrowers with

²⁸ Cal. Civ. Code §§ 2923.4, *et seq.*

²⁹ N.Y. Comp. Codes R. & Regs. tit. 3, § 419.7.

³⁰ RCW 61.24.031, *et seq.*

³¹ N.Y. Comp. Codes R. & Regs. tit. 3, § 419.7(d)(2)(ii).

³² N.Y. Comp. Codes R. & Regs. tit. 3, § 419.7(e)(1)(i).

³³ *See* 12 C.F.R. §§ 1024.41(b)(2)(i)(B); 1041.41(c)(1)(i).

³⁴ N.Y. C.P.L.R. § 3408.

remedies, including injunctive relief and damages, for material violations.³⁵ Similarly, Washington’s Foreclosure Fairness Act prohibits servicers from issuing notices of default against borrowers who respond to an initial notice of pre-foreclosure options.³⁶ Such borrowers have 90 days to meet and confer with their servicers, and if resolution cannot be reached and a notice of default is issued, borrowers may be eligible for mediation before foreclosure can proceed.³⁷ Additional protections may also be available to borrowers whose mediations are not successful.³⁸

While we strongly support the Proposed Rule’s new loss mitigation framework and attendant consumer protections, we anticipate that states may take a variety of approaches to address the changing market conditions affecting mortgage servicing. As they have in the past, these approaches will work in tandem with federal regulations in order to meet emerging consumer protection needs. States are uniquely well-positioned to respond to the particular characteristics of local lending and real estate markets. For example, borrowers in localities with high property values will likely face different barriers to obtaining loss mitigation than borrowers whose property values have fallen below the amount they owe on their mortgage. Similarly, servicers may assess loans in a second lien position differently than first lien mortgages, affecting communities where large numbers of homeowners have multiple loans. And critically, foreclosure procedures vary widely from state to state.

Regulation X specifically provides that state laws and regulations are not preempted as inconsistent with RESPA or Regulation X if they provide greater protection to consumers than RESPA or Regulation X.³⁹ It is imperative that states retain their ability to craft state-specific protections tailored to the concerns of consumers within their own states. The long history of joint regulation of mortgage servicing demonstrates the need for regulation at both the federal and state level, as well as the effectiveness of this approach. We appreciate the CFPB’s continued recognition that state laws that provide greater protection to homeowners facing foreclosure, including existing state laws that set forth specific obligations for mortgage servicers regarding loss mitigation, are consistent with and not preempted by its rules.

We thank the CFPB for its continuing efforts to protect financially vulnerable and struggling homeowners from avoidable foreclosures and related harms. We support the Proposed

³⁵ Cal. Civ. Code §§ 2923.6, 2924.12, 2924.18, 2924.19.

³⁶ RCW 61.24.031(1).

³⁷ RCW 61.24.163.

³⁸ *E.g.*, RCW 61.24.163(14)(c) (“If an affordable loan modification is not offered in mediation or a written agreement was not reached and the mediator’s certification shows that the net present value of the modified loan exceeds the anticipate nete recovery at foreclosure, that showing in the certification constitutes a basis for the borrower to enjoin the foreclosure.”).

³⁹ 12 C.F.R. § 1024.5(c)(2)(i).

Rule and encourage the CFPB to implement the suggestions offered above to further strengthen its protections for homeowners.

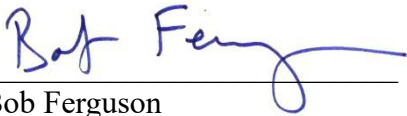
Respectfully submitted,



Leticia James
New York Attorney General



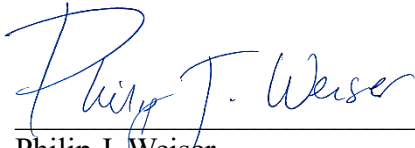
Rob Bonta
California Attorney General



Bob Ferguson
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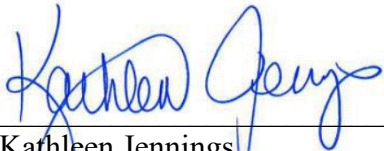
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Arizona Attorney General



Philip J. Weiser
Colorado Attorney General



William Tong
Connecticut Attorney General



Kathleen Jennings
Delaware Attorney General



Brian L. Schwalb
District of Columbia Attorney General



Anne E. Lopez
Hawaii Attorney General



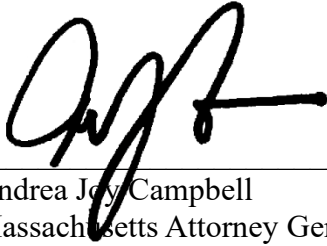
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Illinois Attorney General



Aaron M. Frey
Maine Attorney General



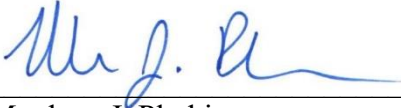
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Maryland Attorney General



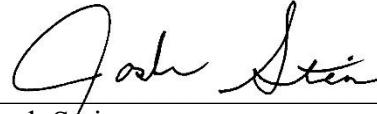
Andrea Joy Campbell
Massachusetts Attorney General



Aaron D. Ford
Nevada Attorney General



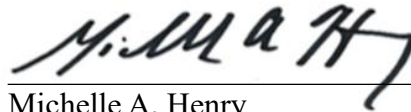
Matthew J. Platkin
New Jersey Attorney General



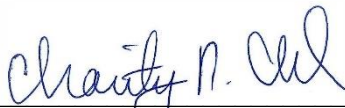
Josh Stein
North Carolina Attorney General



Ellen F. Rosenblum
Oregon Attorney General



Michelle A. Henry
Pennsylvania Attorney General



Charity R. Clark
Vermont Attorney General