

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,  
2005 N. Central Ave.  
Phoenix, AZ 85004

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

THE PEOPLE OF THE STATE OF  
CALIFORNIA,  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013

THE STATE OF COLORADO,  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 6<sup>th</sup> Floor  
Denver, CO 80203

THE STATE OF CONNECTICUT,  
165 Capitol Avenue  
Hartford, CT 06106

THE STATE OF DELAWARE,  
820 N. French Street, 5<sup>th</sup> Floor  
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, GA 30334

THE STATE OF HAWAII, )  
425 Queen Street )  
Honolulu, HI 96813 )  
)  
THE STATE OF IDAHO, )  
700 W. Jefferson St. )  
PO 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, IN 46204 )  
)  
THE STATE OF IOWA, )  
1305 E. Walnut St. )  
Des Moines, IA 50319 )  
)  
THE STATE OF KANSAS, )  
*ex rel.* Attorney General Derek Schmidt )  
120 SW 10th Avenue, 2nd Floor )  
Topeka, KS 66612 )  
)  
THE COMMONWEALTH OF KENTUCKY, )  
State Capitol, Suite 118 )  
700 Capital Avenue )  
Frankfort, KY 40601-3449 )  
)  
THE STATE OF LOUISIANA, )  
1885 N. Third Street )  
Baton Rouge, LA 70802 )  
)  
THE STATE OF MAINE, )  
Burton Cross Office Building, 6th Floor )  
111 Sewall Street )  
Augusta, ME 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, 5<sup>th</sup> Floor )  
PO Box 30736 )  
Lansing, MI 48909 )

THE STATE OF MINNESOTA, )  
445 Minnesota Street, Suite 1200 )  
St. Paul, MN 55101-2130 )

THE STATE OF MISSISSIPPI, )  
PO Box 220 )  
Jackson, MS 39205 )

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, NV 89701 )

THE STATE OF NEW HAMPSHIRE, )  
33 Capitol Street )  
Concord, NH 03301 )

THE STATE OF NEW JERSEY, )  
124 Halsey Street – 5th Floor )  
PO Box 45029 )  
Newark, NJ 07101 )

THE STATE OF NEW MEXICO, )  
PO Drawer 1508 )  
Santa Fe, NM 87504-1508 )  
)  
THE STATE OF NEW YORK, )  
28 Liberty Street )  
New York, NY 10005 )  
)  
THE STATE OF NORTH CAROLINA, )  
PO 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. 21<sup>st</sup> Street )  
Oklahoma City, OK 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, *ex rel.* )  
HERBERT H. SLATERY III, )  
Attorney General and Reporter, )  
425 Fifth Avenue North )  
Nashville, TN 37243-3400 )  
) )  
THE STATE OF TEXAS, )  
401 E. Franklin Avenue, Suite 530 )  
El Paso, TX 79901 )  
) )  
THE STATE OF UTAH, )  
350 North State Street, #230 )  
Salt Lake City, UT 84114-2320 )  
) )  
THE STATE OF VERMONT, )  
109 State Street )  
Montpelier, VT 05609 )  
) )  
THE COMMONWEALTH OF VIRGINIA, )  
202 North 9th Street )  
Richmond, VA 23219 )  
) )  
THE STATE OF WASHINGTON, )  
800 Fifth Avenue, Suite 2000 )  
Seattle, WA 98104 )  
) )  
THE STATE OF WEST VIRGINIA, )  
PO Box 1789 )  
Charleston, WV 25326 )  
) )  
THE STATE OF WISCONSIN, )  
Post Office Box 7857 )  
Madison, WI 53707-7857 )  
) )  
THE STATE OF WYOMING, )  
Kendrick Building )  
2320 Capitol Avenue )  
Cheyenne, WY 82002 )  
) )  
and )  
) )  
THE DISTRICT OF COLUMBIA, )  
400 6th Street, N.W., 10th Floor )  
Washington, DC 20001 )  
) )  
Plaintiffs, )

v. )  
 )  
 )  
 NATIONSTAR MORTGAGE LLC, )  
 D/B/A MR. COOPER, )  
 8950 Cypress Waters Boulevard )  
 Coppell, TX 75019 )  
 )  
 Defendant. )  
 )  
 )  
 \_\_\_\_\_ )

**COMPLAINT**

Now come 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, 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, “Plaintiff States” 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 Nationstar Mortgage LLC, d/b/a Mr. Cooper (“Defendant” or “Nationstar”) for alleged misconduct related to its servicing of single-family residential mortgages.

2. As described in the allegations below, Defendant’s conduct during the servicing of borrowers’ mortgage loans constituted unfair or deceptive acts and practices by Defendant and its vendors and resulted in violations of homeowners’ rights and protections.

3. Pursuant to 12 U.S.C. § 5552(b)(1), the Attorneys General have performed all conditions precedent to the filing of this action.

### **THE PARTIES**

4. 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 other monetary relief for violations of the consumer protection laws of their States and the CFPA.

5. Defendant is a privately held wholly owned subsidiary of Mr. Cooper Group, Inc. that services residential mortgage loans. It has its principal place of business in Coppell, Texas. Nationstar transacts or has transacted business in this District and throughout the United States.

### **JURISDICTION AND VENUE**

6. 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 the Attorneys General pursuant to their authority under 12 U.S.C. § 5552(a)(1). *See The State of Alabama, et al., v. PHH Mortgage Corporation*, No. 1:18-cv-00009-TFH (D.D.C. May 10, 2018).

7. In addition, pursuant to 28 U.S.C. § 1367(a), this Court has supplemental jurisdiction over the subject matter of the state unfair and deceptive acts and practices 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).

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

### **THE MORTGAGE SERVICING INDUSTRY**

9. 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.

10. 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.

11. 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.



12. 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.” Inbound and outbound transfers of mortgage loans from one servicer to another are common in the mortgage servicing industry, and 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.

13. As part of the foreclosure management and property preservation processes, servicers frequently retain third party vendors to inspect properties owned by delinquent borrowers to determine whether borrowers are living in their homes. If a property is deemed vacant, servicers are responsible for securing the property by changing locks and maintaining the property to avoid disrepair.

#### **NATIONSTAR’S MORTGAGE SERVICING MISCONDUCT**

14. Nationstar 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.

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

16. Nationstar is engaged in trade or commerce in each of the Plaintiff States and is subject to the consumer protection laws of the Plaintiff States in the conduct of its debt collection, mortgage servicing, loss mitigation, and foreclosure activities. The consumer

protection laws of the Plaintiff States include laws prohibiting unfair or deceptive acts or practices.

17. Nationstar 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 mortgage loans, or who require loss mitigation assistance.

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

19. In the course of Nationstar's mortgage servicing activities, Nationstar engaged in the following unlawful acts and practices:

- a. failing to properly oversee third party vendors retained for servicing and foreclosure operations, including third party vendors responsible for changing locks during the property preservation process;
- b. failing to properly oversee and implement the inbound transfer of mortgage loans;
- c. failing to appropriately identify loans with pending loan modification applications (in-flight modifications) when a loan was being transferred to Nationstar for servicing;
- d. failing to timely and accurately apply payments made by certain borrowers;
- e. threatening foreclosure and conveying conflicting messages to certain borrowers engaged in loss mitigation;
- f. failing to properly process borrowers' applications for loan modifications;
- g. failing to properly review and respond to borrower complaints;

- h. failing to identify and communicate with successors in interest;
- i. failing to make timely escrow disbursements, including the failure to timely remit property tax payments;
- j. failing to properly maintain escrow accounts, including collecting escrow shortages from borrowers on a completed Chapter 13 bankruptcy plan that were not legally due;
- k. failing to timely terminate borrowers' private mortgage insurance; and
- l. collecting monthly modified payment amounts on certain loans where the amounts charged for principal and interest exceed the principal and interest amount contained in the trial plan agreement.

**COUNT I**

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

- 20. The allegations in paragraphs 1 through 19 above are incorporated herein by reference.
- 21. Nationstar's loan servicing conduct, as described above, constitutes unfair or deceptive acts or practices in violation of the consumer protection laws of each Plaintiff State.
- 22. Nationstar's unlawful conduct has resulted in injury to consumers residing in the Plaintiff States whose mortgage loans were serviced by Nationstar. Harm was sustained by such citizens, and the Attorneys General have incurred substantial expenses in their investigations and attempts to obtain remedies for Nationstar's unlawful conduct.

**COUNT II**

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

23. The allegations in paragraphs 1 through 19 above are incorporated herein by reference.

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

**PRAYER FOR RELIEF**

WHEREFORE, the Attorneys General, pursuant to 12 U.S.C. §§ 5552(a)(1) and 5565 and their state 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. 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: December 7, 2020

Respectfully submitted,

For the State of Alabama:

/s/ Olivia Martin

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

Olivia.Martin@AlabamaAG.gov

For the State of Alaska:

CLYDE "ED" SNIFFEN, JR.  
Acting Attorney General

/s/ Ian Engelbeck  
IAN R. ENGELBECK  
Alaska Bar No. 2010094  
Assistant Attorney General  
Alaska Department of Law  
1031 W. 4th Avenue, Ste. 200  
Anchorage, AK 99501  
Tel.: 907-269-5200  
Fax: 907-276-3697  
Ian.Engelbeck@alaska.gov

For the State of Arizona:

MARK BRNOVICH  
Arizona Attorney General

/s/ Matthew du Mee  
MATTHEW DU MEE  
Consumer Litigation Unit Chief Counsel  
2005 N. Central Ave.  
Phoenix, AZ 85004-1592  
Tel.: 602-542-5025  
Fax: 602-542-4085  
Matthew.duMee@azag.gov

For the State of Arkansas:

LESLIE RUTLEDGE  
Attorney General

/s/ Johnathan R. Carter  
JOHNATHAN R. CARTER  
(Ark. Bar No. 2007105)  
Assistant Attorney General  
Arkansas Attorney General's Office  
323 Center Street, Suite 200  
Little Rock, AR 72201  
Tel.: 501.682.8063  
Johnathan.Carter@arkansasag.gov



For the People of the State of California:

XAVIER BECERRA  
Attorney General

/s/ Tina Charoenpong  
TINA CHAROENPONG  
Deputy Attorney General  
Office of the Attorney General  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Tel.: 213-269-6000  
Fax: 213-897-4951  
Tina.Charoenpong@doj.ca.gov

For the State of Colorado, *ex rel.*

PHILIP J. WEISER  
Attorney General

/s/ Jennifer Miner Dethmers  
JENNIFER MINER DETHMERS  
Senior Assistant Attorney General  
Jennifer.Dethmers@coag.gov

/s/Nikolai Frant  
NIKOLAI FRANT  
First Assistant Attorney General  
Nikolai.frant@coag.gov

Colorado Department of Law  
Consumer Protection Section  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 6<sup>th</sup> Floor  
Denver, CO 80203  
Tel.: 720-508-6229  
Fax: 720-508-6040

For the State of Connecticut:

WILLIAM TONG  
Attorney General

/s/ Joseph Chambers  
JOSEPH J. CHAMBERS  
Assistant Attorney General  
Finance Department Head  
Connecticut Office of the Attorney General  
165 Capitol Avenue,  
Hartford, Connecticut 06106  
Tel.: 860-808-5270  
Joseph.Chambers@ct.gov

For the State of Delaware:

/s/ Michael Clarke  
MICHAEL CLARKE  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French Street, 5th Floor  
Wilmington, DE 19801  
Tel.: 302-577-8308  
Fax: 302-577-8426  
Michael.Clarke@delaware.gov

For the District of Columbia:

KARL A. RACINE  
Attorney General for the District of Columbia

/s/ Benjamin Wiseman  
BENJAMIN WISEMAN, DC Bar # 1005442  
Director, Office of Consumer Protection  
Office of the Attorney General  
400 6<sup>th</sup> Street, N.W., 10<sup>th</sup> Floor  
Washington, DC 20001  
Tel.: 202-741-5226  
Fax: 202-741-8949  
Benjamin.Wiseman@dc.gov

For the State of Florida:

ASHLEY MOODY  
Attorney General

VICTORIA A. BUTLER  
Director, Consumer Protection Division

/s/ Sasha Funk Granai  
SASHA FUNK GRANAI  
Deputy Director  
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  
Sasha.FunkGranai@myfloridalegal.com

For the State of Georgia:

CHRISTOPHER M. CARR  
Attorney General

/s/ Alkesh Patel  
Alkesh Patel  
Assistant Attorney General  
Commercial Transactions & Litigation  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia, 30334  
Tel.: 404-458-3598  
APatel@LAW.GA.GOV

For the State of Hawaii:

/s/ James C. Paige  
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  
James.C.Paige@hawaii.gov



For the State of Idaho

LAWRENCE WASDEN  
Attorney General:

/s/ Stephanie Guyon  
STEPHANIE GUYON  
Deputy Attorney General  
Office of the Idaho Attorney General  
954 W. Jefferson St., 2<sup>nd</sup> Fl.  
PO Box 83720  
Boise, ID 83720-0010  
Tel.: 208-334-2424  
Fax: 208-334-4151  
Stephanie.guyon@ag.idaho.gov

For the State of Illinois:

KWAME RAOUL  
Attorney General

/s/ Andrew Dougherty  
ANDREW DOUGHERTY  
Deputy Bureau Chief, Consumer Fraud  
Illinois Attorney General's Office  
100 W. Randolph, 12<sup>th</sup> Floor  
Chicago, IL 60601  
Tel.: 312-814-4982  
Fax: 312-814-2593  
adougherty@atg.state.il.us

For the State of Indiana:

/s/ Scott Barnhart

SCOTT BARNHART

Chief Counsel and Director of Consumer Protection

Office of the Indiana Attorney General

302 West Washington Street

IGCS – 5th Floor

Indianapolis, IN 46204

Tel.: 317-232-6309

Fax: 317-232-7979

Scott.Barnhart[atg.in.gov]

For the State of Iowa:

TOM MILLER  
Iowa Attorney General

/s/ Patrick Madigan  
PATRICK MADIGAN  
Assistant Attorney General  
Office of the Attorney General of Iowa  
Hoover State Office Building  
1305 E. Walnut St.  
Des Moines, IA 50319  
Tel.: 515-281-5926  
Patrick.Madigan@ag.iowa.gov

For the State of Kansas:

Attorney General DEREK SCHMIDT

/s/ Kathryn Carter

KATHRYN CARTER

Deputy Attorney General

Office of the Attorney General

120 SW 10th Ave., 2nd Floor

Topeka, KS 66612

Tel.: 785-368-8407

Fax: 785-291-3699

Kate.Carter@ag.ks.gov

For the Office of the Attorney General of Kentucky:

DANIEL CAMERON  
Attorney General

/s/ Don Rodgers

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  
Don.Rodgers@ky.gov

For the State of Louisiana:

JEFF LANDRY  
Attorney General

/s/ Arham Mughal  
Arham Mughal, La. Bar Roll No. 38354  
Assistant Attorney General  
Public Protection Division  
1885 North Third Street  
Baton Rouge, Louisiana 70802  
Tel.: 225-326-6439  
Fax: 225-326 -6499  
MughalA@ag.louisiana.gov

For the State of Maine:

AARON M. FREY  
Attorney General

/s/ Linda Conti

LINDA CONTI

Assistant Attorney General  
Office of the Maine Attorney General  
Burton Cross Office Building, 6<sup>th</sup> Floor  
111 Sewall Street  
6 State House Station  
Augusta, Maine 04330  
Tel.: 207-626-8800  
Fax: 207-624-7730  
Linda.Conti@maine.gov



For the State of Maryland:

BRIAN E. FROSH  
Attorney General

/s/ Shelly M. Martin  
SHELLY M. MARTIN, DC Bar # 473462  
Assistant Attorney General  
Office of the Attorney General of Maryland  
200 Saint Paul Place  
Baltimore, MD 21202  
Tel.: 410-576-6522  
Fax: 410-576-6566  
smartin@oag.state.md.us

For the Commonwealth of Massachusetts:

MAURA HEALEY  
Attorney General

/s/ Michael Lecaroz  
MICHAEL LECAROZ  
Mass. BBO # 672397  
Assistant Attorney General  
Consumer Protection Division  
One Ashburton Place  
Boston, MA 02108  
Tel.: 617-727-2200  
Michael.Lecaroz@mass.gov

For the State of Michigan:

DANA NESSEL  
Attorney General

/s/ Kathy Fitzgerald  
KATHY FITZGERALD  
MI Bar # 31454  
Assistant Attorney General  
525 W. Ottawa Street, 5<sup>th</sup> Floor  
PO Box 30736  
Lansing, MI 48909  
Tel.: 517-335-7632  
Fax: 517-335-6755  
Fitzgeraldk@michigan.gov

For the State of Minnesota:

KEITH ELLISON  
Attorney General

/s/ Caitlin Micko

CAITLIN MICKO

Assistant Attorney General  
Minnesota Attorney General's Office  
445 Minnesota Street, Suite 1200  
St. Paul, MN 55101-2130  
Tel.: 651-724-9180  
Fax: 651-282-5832  
Caitlin.Micko@ag.state.mn.us

For the State of Mississippi:

LYNN FITCH  
Attorney General

/s/ Seth Shannon  
SETH SHANNON  
MS Bar #103466  
Special Assistant Attorney General  
PO Box 220  
Jackson, MS 39205  
Tel.: 769-237-6406  
seth.shannon@ago.ms.gov

For the State of Missouri:

ERIC S. SCHMITT  
Attorney General

/s/ Michael Schwalbert  
MICHAEL SCHWALBERT  
MO Bar #63229  
Assistant Attorney General  
815 Olive Street, Suite 200  
Saint Louis, Missouri 63101  
Phone: 314-340-7888  
Fax: 314-340-7981  
michael.schwalbert@ago.mo.gov

For the State of Montana:

TIMOTHY C. FOX  
Attorney General

/s/ Chuck Munson  
CHUCK MUNSON  
Assistant Attorney General  
Montana Department of Justice  
215 N. Sanders  
Helena MT 59624  
Tel.: 406-444-2026  
Fax: 406-444-3549  
Cmunson@mt.gov

For the State of Nebraska:

DOUGLAS J. PETERSON,  
Attorney General #18146

/s/ Jocelyn Brasher

JOCELYN J. BRASHER, #26011  
Assistant Attorney General  
Office of the Nebraska Attorney General  
2115 State Capitol  
Lincoln, NE 68509  
Tel.: 402-471-1279  
Jocelyn.Brasher@nebraska.gov



For the State of Nevada:

AARON D. FORD  
Attorney General  
Bureau of Consumer Protection

/s/ Sheri Ann Forbes  
SHERI ANN FORBES  
Senior Deputy Attorney General  
Nevada Bar No. 7337  
555 E. Washington Avenue, Ste. 3900  
Las Vegas, Nevada 89101  
Tel.: 702-486-3085  
Fax: 775-684-1299  
SForbes@ag.nv.gov

For the State of New Hampshire:

/s/ Robert F. Adams

ROBERT F. ADAMS

DC Bar # 259515 (inactive status)

Assistant Attorney General

Consumer Protection & Antitrust Bureau

New Hampshire Department of Justice

33 Capitol Street

Concord, New Hampshire 03301

Tel.: 603-271-2678

Fax: 603-271-2110

Robert.F.Adams@doj.nh.gov

For the State of New Jersey:

GURBIR S. GREWAL  
Attorney General of New Jersey

/s/ Donna J. Dorgan  
DONNA J. DORGAN  
Deputy Attorney General  
Consumer Fraud Prosecution Section  
Division of Law  
124 Halsey Street - 5th Floor  
PO Box 45029  
Newark, NJ 07102  
Tel.: (973) 648-3546  
Fax: (973) 648-4887  
Donna.Dorgan@law.njoag.gov

For the State of New Mexico:

HECTOR H. BALDERAS  
Attorney General

/s/ Lisa Giandomenico

---

LISA GIANDOMENICO  
Assistant Attorney General  
Office of the New Mexico Attorney General  
Consumer & Environmental Protection Division  
201 Third St NW, Suite 300  
Albuquerque, NM 87102  
Tel.: 505-490-4846  
Fax: 505-318-1051  
LGiandomenico@nmag.gov

For the State of New York:

LETITIA JAMES  
Attorney General

/s/ Jane M. Azia

JANE M. AZIA

Bureau Chief

Bureau of Consumer Frauds & Protection

Office of the New York State Attorney General

28 Liberty Street

New York, NY 10005

Tel.: 212-416-8727

Fax: 212-416-6003

Jane.Azia@ag.ny.gov

For the Attorney General of North Carolina:

JOSH STEIN  
Attorney General

/s/ Keith Clayton  
KEITH T. 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  
Kclayton@ncdoj.gov

For the State of North Dakota

WAYNE STENEHJEM  
Attorney General

/s/ Parrell D. Grossman

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  
Pgrossman@nd.gov

For the State of Ohio:

DAVE YOST  
Ohio Attorney General

/s/ Tracy Morrison Dickens

TRACY MORRISON DICKENS

(Ohio Bar #0082898)

Tracy.Dickens@ohioattorneygeneral.gov

TIMOTHY W. EFFLER

(Ohio Bar #0083768)

Timothy.Effler@ohioattorneygeneral.gov

Assistant Attorneys General  
Consumer Protection Section  
30 E. Broad St., 14th Floor  
Columbus, Ohio 43215  
Tel.: 614-644-9618  
Fax: 866-449-0989



For the State of Oklahoma:

MIKE HUNTER

Attorney General for the State of Oklahoma

/s/ Malisa McPherson

MALISA MCPHERSON, OBA #32070

Assistant Attorney General

Deputy Chief, Consumer Protection Unit

313 N.E. 21<sup>st</sup> Street

Oklahoma City, Oklahoma 73105

Tel.: 405-521-3921

Fax: 405-522-0085

Malisa.McPherson@oag.ok.gov

For the State of Oregon:

ELLEN ROSENBLUM  
Attorney General

/s/ D. Althea Cullen  
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  
Althea.d.cullen@doj.state.or.us

For the Commonwealth of Pennsylvania

JOSH SHAPIRO  
Attorney General

/s/ Nicholas F.B. Smyth  
NICHOLAS F. B. SMYTH  
DC Bar # 1012913 (inactive status)  
Senior Deputy Attorney General  
Commonwealth of Pennsylvania  
Office of Attorney General  
1251 Waterfront Pl, Level M  
Pittsburgh, PA 15222  
Tel: 412-880-0475  
Fax: 412-880-0196  
Nsmyth@attorneygeneral.gov

For the State of Rhode Island:

PETER F. NERONHA  
Attorney General

/s/ David Marzilli

DAVID MARZILLI

Rhode Island Office of the Attorney General

Special Assistant Attorney General

150 South Main Street

Providence, RI 02903

Tel: 401-274-4400 Ext. 2030

Fax: 401-222-1302

DMarzilli@riag.ri.gov

For the State of South Carolina:

ALAN WILSON  
Attorney General

/s/ Jared Libet

---

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  
Jlibet@scag.gov

For the State of South Dakota:

/s/ Philip D. Carlson  
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  
Phil.Carlson@state.sd.us

For the State of Tennessee:

HERBERT H. SLATERY III  
Attorney General and Reporter

/s/ Travis Brown

TRAVIS BROWN, B.P.R. No. 034164  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Public Protection Section  
Consumer Protection Division  
315 Deaderick St., 20th Fl.  
Nashville, TN 37243  
Tel.: (615) 741-3533  
Fax: (615) 532-2510  
Travis.Brown@ag.tn.gov  
*Attorney for the State of Tennessee*

For the State of Texas:

/s/ Richard Bischoff

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

Richard.Bischoff@oag.texas.gov



For the State of Utah:

/s/ Sean D. Reyes

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

uag@agutah.gov

For the State of Vermont:

THOMAS J. DONOVAN, JR.  
Attorney General

/s/ James Layman  
JAMES LAYMAN  
Assistant Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
Tel.: 802-828-2315  
James.Layman@vermont.gov

For The Commonwealth of Virginia,  
*ex rel.* MARK R. HERRING,  
Attorney General:

/s/ James E. Scott

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

JScott@oag.state.va.us

For the State of Washington:

ROBERT FERGUSON  
Attorney General

/s/ Amy Teng

AMY TENG, WSBA #50003  
Assistant Attorney General  
Consumer Protection Division  
Washington State  
Office of the Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
Tel: 206-464-7744  
Fax: 206-587-5636  
Amy.teng@atg.wa.gov

For the State of West Virginia:

PATRICK MORRISEY  
Attorney General

/s/ Tanya L. Godfrey  
TANYA L. GODFREY, DC Bar # 1016435  
Assistant Attorney General  
Office of the West Virginia Attorney General  
Consumer Protection and Antitrust Division  
PO Box 1789  
Charleston, WV 25326  
Tel.: 304-558-8986  
Fax: 304-558-0184  
Tanya.L.Godfrey@wvago.gov

For the State of Wisconsin:

JOSHUA L. KAUL  
Attorney General of Wisconsin

/s/ Colin R. Stroud  
Colin R. Stroud  
Assistant Attorney General  
Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
Tel.: 608-261-9224  
Strouder@doj.state.wi.us

For the State of Wyoming:

BRIDGET HILL  
Wyoming Attorney General

/s/ Benjamin M. Burningham

BENJAMIN M. BURNINGHAM

(Wyo. Bar No. #7-5616)

(DC Bar No. # 1021923) (inactive status)

Senior Assistant Attorney General

Kendrick Building

2320 Capitol Avenue

Cheyenne, WY 82002

Tel.: 307-777-7847

Fax: 307-777-3435

Ben.Burningham@wyo.gov

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This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Mr. Cooper to Pay \\$5.8M Settlement Over Alleged Mortgage Servicing Misconduct](#)

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