IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, *et al.*, Plaintiffs, v. HSBC NORTH AMERICA HOLDINGS INC., *et al.*, Defendants.	Civil Action No. 16-0199

CONSENT JUDGMENT

WHEREAS, Plaintiffs, the United States of America 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, the States, Commonwealths, and the District of Columbia are referred to as the "States") filed their complaint on February 5, 2016, alleging that HSBC North America Holdings Inc. ("HNAH"), HSBC Bank USA, N.A. ("HBUS"), HSBC Finance Corporation ("HBIO"), and HSBC Mortgage Services Inc. ("HMSI") (collectively, "Defendants") violated, among other laws, the Unfair and Deceptive Acts and Practices laws of the Plaintiff States, the

False Claims Act, the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, and the Bankruptcy Code and Federal Rules of Bankruptcy Procedure;

WHEREAS, the parties have agreed to resolve their claims without the need for litigation;

WHEREAS, Defendants, by their attorneys, have consented to entry of this Consent Judgment without trial or adjudication of any issue of fact or law and to waive any appeal if the Consent Judgment is entered as submitted by the parties;

WHEREAS, Defendants, by entering into this Consent Judgment, do not admit the allegations of the Complaint other than those facts deemed necessary to the jurisdiction of this Court;

WHEREAS, the intention of the United States and the States in effecting this settlement is to remediate harms allegedly resulting from the alleged unlawful conduct of the Defendants;

AND WHEREAS, Defendants have agreed to waive service of the complaint and summons and hereby acknowledge the same;

NOW THEREFORE, without trial or adjudication of issues of fact or law, without this Consent Judgment constituting evidence against Defendants, and upon consent of Defendants, the Court finds that there is good and sufficient cause to enter this Consent Judgment, and that it is therefore ORDERED, ADJUDGED, AND DECREED:

I. JURISDICTION

1. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331, 1345, 1355(a), and 1367, and under 31 U.S.C. § 3732(a) and (b), and over Defendants. The Complaint states a claim upon which relief may be granted against Defendants. Venue is appropriate in this District pursuant to 28 U.S.C. § 1391(b)(2) and 31 U.S.C. § 3732(a).

II. SERVICING STANDARDS

2. Defendants shall comply with the Servicing Standards, attached hereto as Exhibit A, in accordance with their terms and Section A of Exhibit E, attached hereto.

III. FINANCIAL TERMS

3. *Payment Settlement Amounts.* Defendants shall pay the sum of one hundred million dollars ($100,000,000.00), which shall be known as the "Direct Payment Settlement Amount." Forty million and five hundred thousand dollars ($40,500,000.00) (the "Federal Payment Settlement Amount") of the Direct Payment Settlement Amount shall be paid by Defendants by electronic funds transfer within seven days after the date on which this Consent Judgment has been entered by the Court and has become final and non-appealable[1] ("Date of Entry") pursuant to written instructions to be provided by the United States Department of Justice. The remaining fifty-nine million and five hundred thousand dollars ($59,500,000.00) (the "State Payment Settlement Amounts") of the Direct Payment Settlement Amount shall be paid into an interest bearing escrow account to be established for this purpose and shall be distributed in the manner and for the purposes specified in Exhibit B. Defendants shall pay the State Payment Settlement Amounts by electronic funds transfer, pursuant to written instructions to be provided by the State Members of the Monitoring Committee into an escrow account established in accordance with this Paragraph 3, within seven days of receiving notice that the escrow account has been established or within seven days of the Date of Entry of this Consent Judgment, whichever is later. After Defendants have made the required payments, Defendants shall no longer have any property right, title, interest or other legal claim in any funds, including those held in escrow. The interest bearing escrow account established by this Paragraph 3 is

[1] An order entering the Consent Judgment shall be deemed final and non-appealable for this purpose if there is no party with a right to appeal the order on the day it is entered.

intended to be a Qualified Settlement Fund within the meaning of Treasury Regulation Section 1.468B-1 of the U.S. Internal Revenue Code of 1986, as amended. The State members of the Monitoring Committee established in Paragraph 8 shall, in their sole discretion, appoint an escrow agent ("Escrow Agent") who shall hold and distribute funds as provided in Exhibit B. All costs and expenses of the Escrow Agent, including taxes, if any, shall be paid from the funds under its control, including any interest earned on the funds.

4. *Payments to Foreclosed Borrowers.* In accordance with written instructions from the State members of the Monitoring Committee, for the purposes set forth in Exhibit C, the Escrow Agent shall transfer from the escrow account to the Administrator appointed under Exhibit C fifty-nine million and three hundred thousand dollars ($59,300,000) (the "Borrower Payment Amount") to enable the Administrator to provide cash payments to borrowers whose homes were finally sold or taken in foreclosure by Defendants between and including January 1, 2008 and December 31, 2012; who submit claims allegedly arising from the Covered Conduct (as that term is defined in Exhibit G hereto); and who otherwise meet criteria set forth by the State members of the Monitoring Committee; and to pay the reasonable costs and expenses of a Settlement Administrator, including state and federal taxes and fees for tax counsel, if any. Defendants shall also pay or cause to be paid any additional amounts necessary to pay claims, if any, for borrowers whose data is provided to the Settlement Administrator by Defendants after Defendants warrant that the data is complete and accurate pursuant to Paragraph 3 of Exhibit C. The Borrower Payment Amount and any other funds provided to the Administrator for these purposes shall be administered in accordance with the terms set forth in Exhibit C.

5. *Consumer Relief.* Defendants shall provide three hundred and seventy million dollars ($370,000,000.00) of relief to consumers who meet the eligibility criteria in the forms

and amounts described in Paragraphs 1-9 of Exhibit D, as amended by Exhibit I, to remediate harms allegedly caused by the alleged unlawful conduct of Defendants. Defendants shall receive credit towards its consumer relief obligations as described in Exhibit D as amended by Exhibit I.

IV. ENFORCEMENT

6. The Servicing Standards and Consumer Relief Requirements, attached as Exhibits A and D, are incorporated herein as the judgment of this Court and shall be enforced in accordance with the authorities provided in the Enforcement Terms, attached hereto as Exhibit E.

7. The Parties agree that Joseph A. Smith, Jr. shall be the Monitor and shall have the authorities and perform the duties described in the Enforcement Terms, attached hereto as Exhibit E.

8. The Parties agree that the Monitoring Committee established pursuant to certain Consent Judgments entered in *United States, et al. v. Bank of America Corp., et al.*, No. 12-civ-00361-RMC (April 4, 2012) (Docket Nos. 10-14) and referenced specifically in paragraph 8 of those Consent Judgments, shall be designated as the committee responsible for performing the role of the Administration and Monitoring Committee, as described in the Enforcement Terms. References to the "Monitoring Committee" in this Consent Judgment and related documents shall be understood to refer to the same Monitoring Committee as that established in the *Bank of America Corp.* case referenced in the preceding sentence, except that the Monitoring Committee will not include any non-signatories to this Consent Judgment, and the Monitoring Committee shall serve as the representative of the participating state and federal agencies in the administration of all aspects of this Consent Judgment and the monitoring of compliance with it by the Defendants.

V. RELEASES

9. The United States and Defendants have agreed, in consideration for the terms provided herein, for the release of certain claims and remedies, as provided in the Federal Release, attached hereto as Exhibit F. The United States and Defendants have also agreed that certain claims and remedies are not released, as provided in Paragraph 11 of Exhibit F. The releases contained in Exhibit F shall become effective upon payment of the Direct Payment Settlement Amount by Defendants.

10. The Plaintiff States and Defendants have agreed, in consideration for the terms provided herein, for the release of certain claims and remedies, as provided in the State Release, attached hereto as Exhibit G. The State Plaintiffs and Defendants have also agreed that certain claims and remedies are not released, as provided in Part IV of Exhibit G. The releases contained in Exhibit G shall become effective upon payment of the Direct Payment Settlement Amount by Defendants.

VI. OTHER TERMS

11. In the event that the Defendants (a) do not complete the Consumer Relief Requirements set forth in Exhibit D, as amended by Exhibit I, and (b) do not make the Consumer Relief Payments (as that term is defined in Exhibit F (Federal Release)) and fail to cure such non-payment within thirty days of written notice by the party, the United States and any State Plaintiff may withdraw from the Consent Judgment and declare it null and void with respect to the withdrawing party.

12. This Court retains jurisdiction for the duration of this Consent Judgment to enforce its terms. The parties may jointly seek to modify the terms of this Consent Judgment,

subject to the approval of this Court. This Consent Judgment may be modified only by order of this Court.

13. The Effective Date of this Consent Judgment shall be the date the Consent Judgment is executed by all parties.

14. This Consent Judgment shall remain in full force and effect until four Quarters of compliance testing have been completed, which shall be no later than December 31, 2016 (the "Term"), at which time the Defendants' obligations under the Consent Judgment shall expire, except that, pursuant to Exhibit E, Defendants shall submit a final Quarterly Report for the last Quarter or portion thereof falling within the Term and cooperate with the Monitor's review of said report and the Monitor's review and certification that Defendant has completed its consumer relief obligations, if not already certified, all of which shall be concluded no later than June 30, 2017. Defendants' obligations to submit a final Quarterly Report and cooperate with the Monitor's review of said report and Defendant's consumer relief obligations shall expire June 30, 2017, but the Court shall retain jurisdiction for purposes of enforcing or remedying any outstanding violations, including any violations that are identified in the final Monitor Report and that have occurred but not been cured during the Term, and to enforce HSBC's consumer relief obligations, to the extent that the Monitor has not already certified that HSBC has satisfied its consumer relief obligations. The Parties have agreed to a shortened term in recognition of the fact that HBIO has steadily decreased its servicing portfolio over the last several years, and has moved a significant portion of its remaining serviced loans to held-for-sale status, ultimately intending to exit servicing.

15. Except as otherwise agreed in Exhibit B, each party to this litigation will bear its own costs and attorneys' fees associated with this litigation.

16. Nothing in this Consent Judgment shall relieve Defendants of their obligation to comply with applicable state and federal law.

17. The sum and substance of the parties' agreement and of this Consent Judgment are reflected herein and in the Exhibits attached hereto. In the event of a conflict between the terms of the Exhibits and paragraphs 1-17 of this summary document, the terms of the Exhibits shall govern.

SO ORDERED this ____ day of _____, 2015

_____

UNITED STATES DISTRICT JUDGE

For the United States:

STUART DELERY
Acting Associate Attorney General
U.S. Department of Justice
950 Pennsylvania Ave., N.W.
Washington, DC 20530
Tel.: 202-514-9500
Fax: 202-514-0238

For the Department of the Treasury:

JOHN H. STURC
Chief Counsel
Office of Financial Stability
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220
Tel.: 202-622-5451

For the Department of Housing and Urban Development:

HELEN R. KANOVSKY
General Counsel
U.S. Department of Housing and Urban Development
451 7th Street, S.W.
Washington, DC 20410
Tel.: 202-708-2244
Fax: 202-708-3389

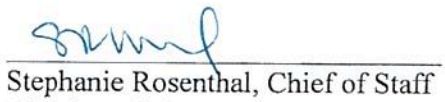
For the Consumer Financial Protection Bureau:
(as to Exhibit F only):

James T. Sugarman
Assistant Litigation Deputy
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552
Tel: 202-435-5915

For the Executive Office for U.S. Trustees

RAMONA D. ELLIOTT
Deputy Director/General Counsel
441 G Street, N.W., Suite 6150
Washington, DC 20530
Tel.: 202-307-1399
Fax: 202-307-2397

For the Federal Trade Commission
(as to Exhibit F only):



Stephanie Rosenthal, Chief of Staff
Division of Financial Practices
Federal Trade Commission
Bureau of Consumer Protection
600 Pennsylvania Ave., NW
CC-10232
Washington, DC 20058
Tel: 202-326-3332
Fax: 202-326-3768

For the State of Alabama:

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

For the State of Alaska:

CYNTHIA C. DRINKWATER
Assistant Attorney General
Alaska Attorney General's Office
1031 W. 4th Avenue, Ste. 200
Anchorage, AK 99501
Tel.: 907-269-5200
Fax: 907-264-8554

For the State of Arizona:

MARK BRNOVICH
Arizona Attorney General
by Jeremy T. Shorbe
Assistant Attorney General
400 W. Congress Street, Suite S315
Tucson, AZ 85701
Tel.: 520-682-6504
Fax: 520-628-6532

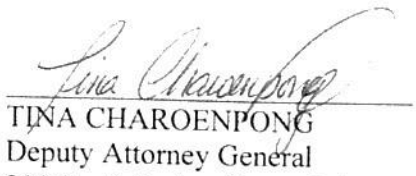
For the State of Arkansas:

LESLIE RUTLEDGE
Attorney General

SARAH PAGE TACKER
Ark. Bar No. 2002-189
Deputy Attorney General
Office of the Attorney General
323 Center Street, Suite 200
Little Rock, Arkansas 72201
Tel.: 501-682-1321
Fax: 501-682-8118

For the State of California:

KAMALA D. HARRIS
Attorney General



TINA CHAROENPONG
Deputy Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Tel.: 213-897-2000
Fax: 213-897-4951

For the State of Colorado, *ex. rel.*

CYNTHIA H. COFFMAN, Attorney General:

JENNIFER MINER DETHMERS
THERESA C. LESHER
Assistant Attorneys General
Consumer Protection Section
Colorado Department of Law
Ralph L. Carr Colorado Judicial Center
1300 Broadway, 7th Floor
Denver, Colorado 80203
Tel.: 720-508-6228
Fax: 720-508-6040

For the State of Connecticut:

GEORGE JEPSEN, Attorney General

JOSEPH J. CHAMBERS
Assistant Attorney General
Office of the Connecticut Attorney General
55 Elm Street, P.O. Box 120
Hartford, CT 06141-0120
Tel: 860-808-5270
Fax: 860-808-5385

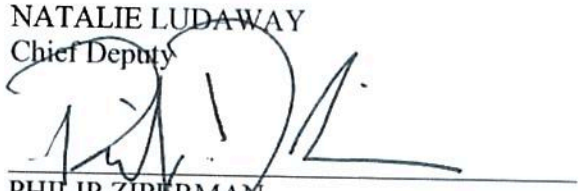
For the State of Delaware:

MATTHEW LINTNER
Director Fraud Division
Delaware Department of Justice
820 N. French Street, 5th Floor
Wilmington, DE 19801
Tel.: 302-577-8935
Fax: 302-577-6499

For the District of Columbia:

KARL A. RACINE
Attorney General for the District of Columbia

NATALIE LUDAWAY
Chief Deputy

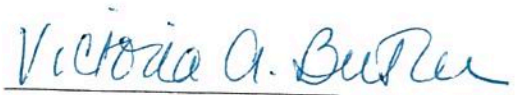


PHILIP ZIPERMAN
Director, Office of Consumer Protection
Office of the Attorney General
441 Fourth Street, N.W., Suite 600-South
Washington, D.C. 20001
Tel: 202-442-9886
Fax: 202-715-7726

For the State of Florida:

PAMELA JO BONDI
Attorney General

PATRICIA A. CONNERS
Deputy Attorney General



VICTORIA A. BUTLER
Chief Assistant Attorney General
Central Florida Bureau, Consumer Protection Division
3507 E. Frontage Road
Suite 325
Tampa, FL 33607
Tel: 813-287-7950
Fax: 813-281-5515

For the State of Georgia:

JEFFREY W. STUMP
Assistant Attorney General
Georgia Department of Law
40 Capitol Square, S.W.
Atlanta, Georgia 30334
Tel.: 404-656-3337
Fax: 404-656-0677

For the State of Hawaii:

JAMES C. PAIGE
Deputy Attorney General
Department of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813
Tel: 808-586-1180
Fax: 808-586-1205

For the State of Idaho

LAWRENCE WASDEN, Attorney General:

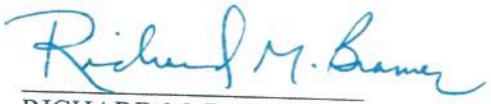
STEPHANIE GUYON
Deputy Attorney General
Office of the Idaho Attorney General
954 W. Jefferson St., 2nd Floor
P.O. Box 83720
Boise, ID 83720-0010
Tel.: 208-334-2424
Fax: 208-334-4151

For the State of Illinois:

LISA MADIGAN
Attorney General

DEBORAH HAGAN
Chief, Consumer Protection Division
SUSAN ELLIS
Chief, Consumer Fraud Bureau
Illinois Attorney General's Office
100 W. Randolph, 12th Floor
Chicago, IL 60601
Tel.: 312-814-6351
Fax: 312-814-2593

For the State of Indiana:



RICHARD M. BRAMER
Director and Chief Counsel
Consumer Protection Division
Indiana Office of Attorney General
302 West Washington St., IGCS 5th Fl.
Indianapolis, Indiana 46204
Tel.: 317-234-6843
Fax: 317-233-4393

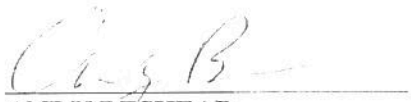
For the State of Iowa:

PATRICK MADIGAN
Assistant Attorney General
1305 E. Walnut St.
Des Moines, IA 50319
Patrick.Madigan@Iowa.gov
Tel: 515-281-5926

For the State of Kansas:

MEGHAN E. STOPPEL
Assistant Attorney General
Office of the Kansas Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, KS 66612
Tel.: 785-296-3751
Fax: 785-291-3699
meghan.stoppel@ag.ks.gov

For the Office of the Attorney
General of Kentucky:



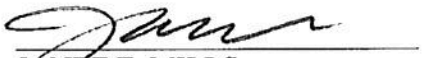
ANDY BESHEAR
Attorney General
Commonwealth of Kentucky
State Capitol, Suite 118
700 Capital Avenue
Frankfort, Kentucky 40601-3449
Tel.: 502-696-5300
Fax: 502-564-2894

For the State of Louisiana:

JEFF LANDRY
Attorney General

Lisha C. Landry
Louisiana Bar Roll Number 34317
Assistant Attorney General
Louisiana Department of Justice
Office of the Attorney General
Public Protection Division
Consumer Protection Section
1885 North Third Street
Baton Rouge, Louisiana 70802
Tel.: 225-326-6471
Fax: 225-326-6499

For the State of Maine:



JANET T. MILLS
Attorney General
Burton Cross Office Building, 6th Floor
111 Sewall Street
6 State House Station
Augusta, Maine 04330
Tel.: 207-626-8800
Fax: 207-624-7730

For the State of Maryland:

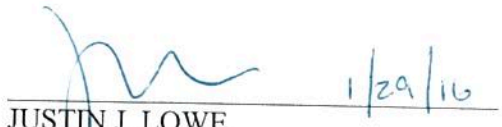
BRIAN E. FROSH
Attorney General

Lucy A. Cardwell

LUCY A. CARDWELL
Assistant Attorney General
Office of the Attorney General
of Maryland
200 Saint Paul Place
Baltimore, MD 21202
Tel: 410-576-6337
Fax: 410-576-6566

For The Commonwealth Of Massachusetts:

MAURA HEALEY
Attorney General



1/29/16

JUSTIN J. LOWE
Mass. BBO # 624857
Assistant Attorney General
Public Protection and Advocacy Bureau
Consumer Protection Division
One Ashburton Place
Boston, MA 02108
Tel: 617-727-2200

For the State of Michigan:

BILL SCHUETTE
Attorney General
D.J. PASCOE
Assistant Attorney General
525 W. Ottawa Street
PO Box 30755
Lansing, MI 48909
Tel.: 517-373-1160
Fax: 517-335-3755

For the State of Minnesota:

LORI SWANSON
Attorney General, State of Minnesota

NATHAN BRENNAMAN
Deputy Attorney General
Minnesota Attorney General's Office
445 Minnesota Street, Suite 1200
St. Paul, MN 55101-2130
Tel.: 651-757-1415
Fax: 651-296-7438

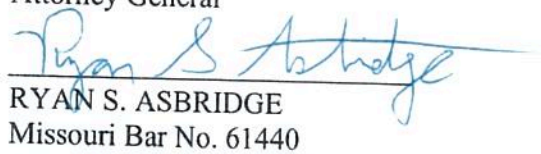
For the State of Mississippi:

JIM HOOD, ATTORNEY GENERAL

BRIDGETTE W. WIGGINS
Special Assistant Attorney General
Mississippi Attorney General's Office
Post Office Box 22947
Jackson, MS 39225-2947
Tel.: 601-359-4279
Fax: 601-359-4231

For the State of Missouri:

CHRIS KOSTER
Attorney General



RYAN S. ASBRIDGE
Missouri Bar No. 61440
Assistant Attorney General
Consumer Protection Division
PO Box 899
Jefferson City, MO 65102
Tel.: 573-751-7677
Fax: 573-751-2041

For the State of Montana:

TIMOTHY C. FOX
Attorney General
CHUCK MUNSON
Assistant Attorney General
Montana Department of Justice
P. O. Box 200151
Helena MT 59620-0151
Tel.: 406-444-2026
Fax: 406-442-1894

For the State of Nebraska:

DOUGLAS J. PETERSON,
Attorney General, #18146

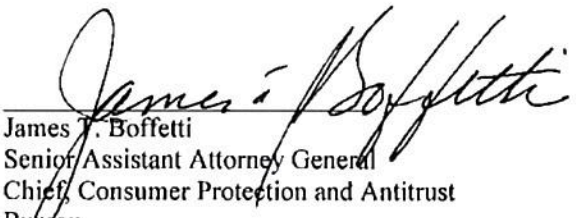
ABIGAIL M. STEMPSON, #25329
Assistant Attorney General
Office of the Attorney General
2115 State Capitol
Lincoln, NE 68509-8920
Tel.: 402-471-2811
Fax: 402-471-4725

For the State of Nevada:

ADAM PAUL LAXALT
Attorney General

SHERI ANN FORBES
Senior Deputy Attorney General
Nevada Bar No. 7337
10791 W. Twain Avenue
Suite 100
Las Vegas, Nevada 89135
Tel: 702-486-3085
Fax: 702-486-3283

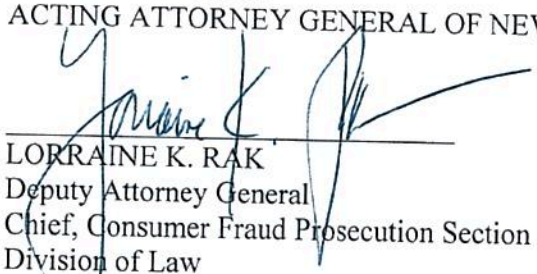
For the State of New Hampshire:



James T. Boffetti
Senior Assistant Attorney General
Chief, Consumer Protection and Antitrust Bureau
N.H. Department of Justice
33 Capitol Street
Concord, New Hampshire 03301
Tel.: 603-271-3643
Fax: 603-271-2110

For the State of New Jersey:

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY



LORRAINE K. RAK
Deputy Attorney General
Chief, Consumer Fraud Prosecution Section
Division of Law
124 Halsey Street – 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Tel.: 973-877-1280
Fax: 973-648-4887

For the State of New Mexico:

HECTOR H. BALDERAS,
Attorney General
Office of New Mexico Attorney General
PO Drawer 1508
Santa Fe, NM 87504-1508
Tel: 505-222-9100
Fax: 505-222-9033

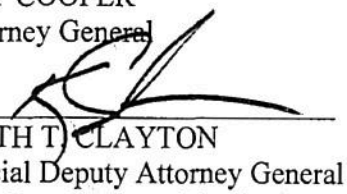
For the State of New York:

ERIC T. SCHNEIDERMAN
Attorney General

JANE M. AZIA
Bureau Chief
Bureau of Consumer Frauds & Protection
Office of the New York State Attorney General
120 Broadway
New York, NY 10271
Tel.: 212-416-8727
Fax: 212-416-6003

For the Attorney General of
North Carolina:

ROY COOPER
Attorney General



KEITH T. CLAYTON
Special Deputy Attorney General
N.C. Department of Justice
P.O. Box 629
Raleigh, NC 27602
Tel: 919-716-6000
Fax: 919-716-6050
Email: kclayton@ncdoj.gov

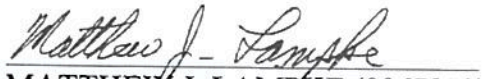
For the State of North Dakota

WAYNE STENEHJEM
Attorney General

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

For the State of Ohio:

MIKE DEWINE
Ohio Attorney General



MATTHEW J. LAMPKE (0067973)
Mortgage Foreclosure Counsel
JEFFREY R. LOESER (0082144)
JENNIFER L. MILDREN (0087564)
Assistant Attorneys General
Consumer Protection Section
30 East Broad Street, 14th Floor
Columbus, Ohio 43215
Tel: 614-466-8831
Fax: 877-650-4712

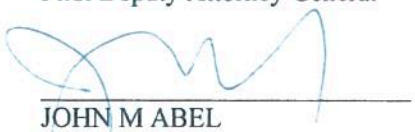
For the State of Oregon,

Attorney General
ELLEN F. ROSENBLUM:

JANET BORTH
Assistant Attorney General
Oregon Department of Justice
Financial Fraud/Consumer Protection
1162 Court St. NE
Salem, OR 97301
Tel.: 503-934-4400
Fax: 503-378-5017

For the Commonwealth of Pennsylvania

Office of Attorney General
BRUCE R. BEEMER
First Deputy Attorney General

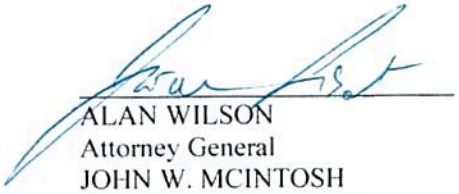


JOHN M ABEL
Senior Deputy Attorney General
Pennsylvania Office of the Attorney General
Bureau of Consumer Protection
15th Floor, Strawberry Square
Harrisburg, PA 17120
Tel: 717-787-1439
Fax: 717-705-3795

For the Rhode Island Department of Attorney General:

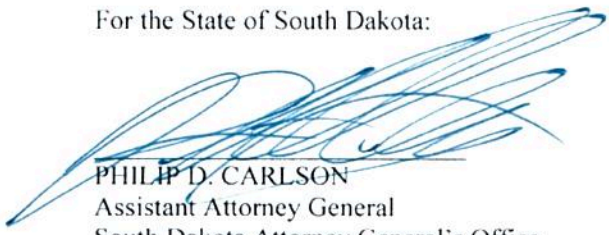
GERALD COYNE
Rhode Island Department of Attorney General
Deputy Attorney General
150 South Main Street
Providence, RI 02903
Tel: 401-274- 4400 Ext. 2257
Fax: 401- 222-1302

For the State of South Carolina:



ALAN WILSON
Attorney General
JOHN W. MCINTOSH
Chief Deputy Attorney General
C. HAVIRD JONES, JR.
Senior Assistant Deputy Attorney General
JARED Q. LIBET
Assistant Deputy Attorney General
South Carolina Attorney General's Office
1000 Assembly Street, Room 519
Columbia, SC 29201
Tel.: 803-734-3970
Fax: 803-734-3677

For the State of South Dakota:



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

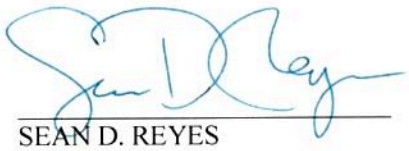
For the State of Tennessee:

HERBERT H. SLATERY III
Attorney General and Reporter
Office of the Tennessee Attorney General
425 Fifth Avenue North
Nashville, TN 37243-3400
Tel.: 615-741-1671
Fax: 615-532-2910

For the State of Texas:

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

For the State of Utah:



SEAN D. REYES
Utah Attorney General
350 North State Street, #230
Salt Lake City, UT 84114-2320
Tel.: 801-538-1191
Fax: 801-538-1121

For the State of Vermont:

WILLIAM H. SORRELL
Attorney General

JAMES LAYMAN
Assistant Attorney General
109 State Street
Montpelier, VT 05609-1001
(802) 828-2315

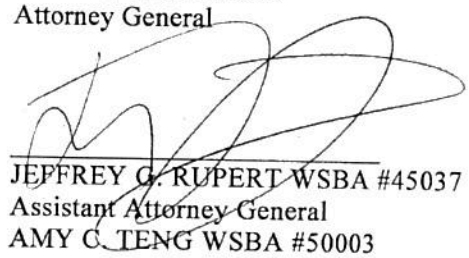
For The Commonwealth of Virginia,

ex rel. MARK R. HERRING,
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
Tel.: 804-786-7364
Fax: 804-786-0122

For the State of Washington:

ROBERT FERGUSON
Attorney General



JEFFREY G. RUPERT WSBA #45037
Assistant Attorney General
AMY C. TENG WSBA #50003
Assistant Attorney General
Consumer Protection Division
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
Tel: 206-464-6293
Fax: 206-587-5636

STATE OF WEST VIRGINIA
PATRICK MORRISEY
ATTORNEY GENERAL

R. STEPHEN JARRELL
Assistant Attorney General
Office of the Attorney General of West Virginia
812 Quarrier Street, 1st Floor
P.O. Box 1789
Charleston, WV 25326
Tel: (304) 558-8986
Fax: (304) 558-0184
Steve.R.Jarrell@wvago.gov

For the State of Wisconsin:

BRAD D. SCHIMEL
Attorney General

GWENDOLYN J. COOLEY
Assistant Attorney General
Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
Tel: 608-261-5810
Fax: 608-267-2778

For the State of Wyoming:

PETER K. MICHAEL
Wyoming Attorney General
Wyoming Attorney General's Office
Kendrick Building
2320 Capitol Ave.
Cheyenne, WY 82002
Tel.: 307-777-7847
Fax: 307-777-3435

For HSBC North America Holdings Inc.:

Patrick J. Burke
President and CEO
HSBC North America Holdings Inc.

For HSBC Bank USA, N.A.:

Patrick J. Burke
President and CEO
HSBC Bank USA, N.A.

For HSBC Finance Corporation:

_____

Kathryn Madison
CEO
HSBC Finance Corporation

For HSBC Mortgage Services Inc.

_____

Kathryn Madison
President
HSBC Mortgage Services Inc.

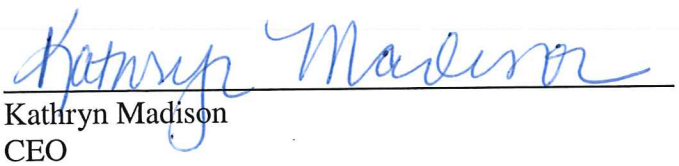
For HSBC North America Holdings Inc.:

Patrick J. Burke
President and CEO
HSBC North America Holdings Inc.

For HSBC Bank USA, N.A.:

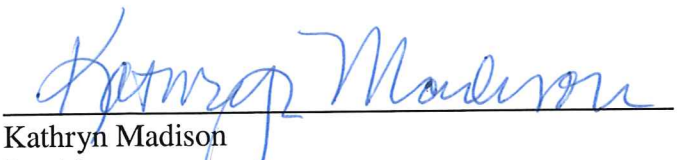
Patrick J. Burke
President and CEO
HSBC Bank USA, N.A.

For HSBC Finance Corporation:



Kathryn Madison
CEO
HSBC Finance Corporation

For HSBC Mortgage Services Inc.



Kathryn Madison
President
HSBC Mortgage Services Inc.