



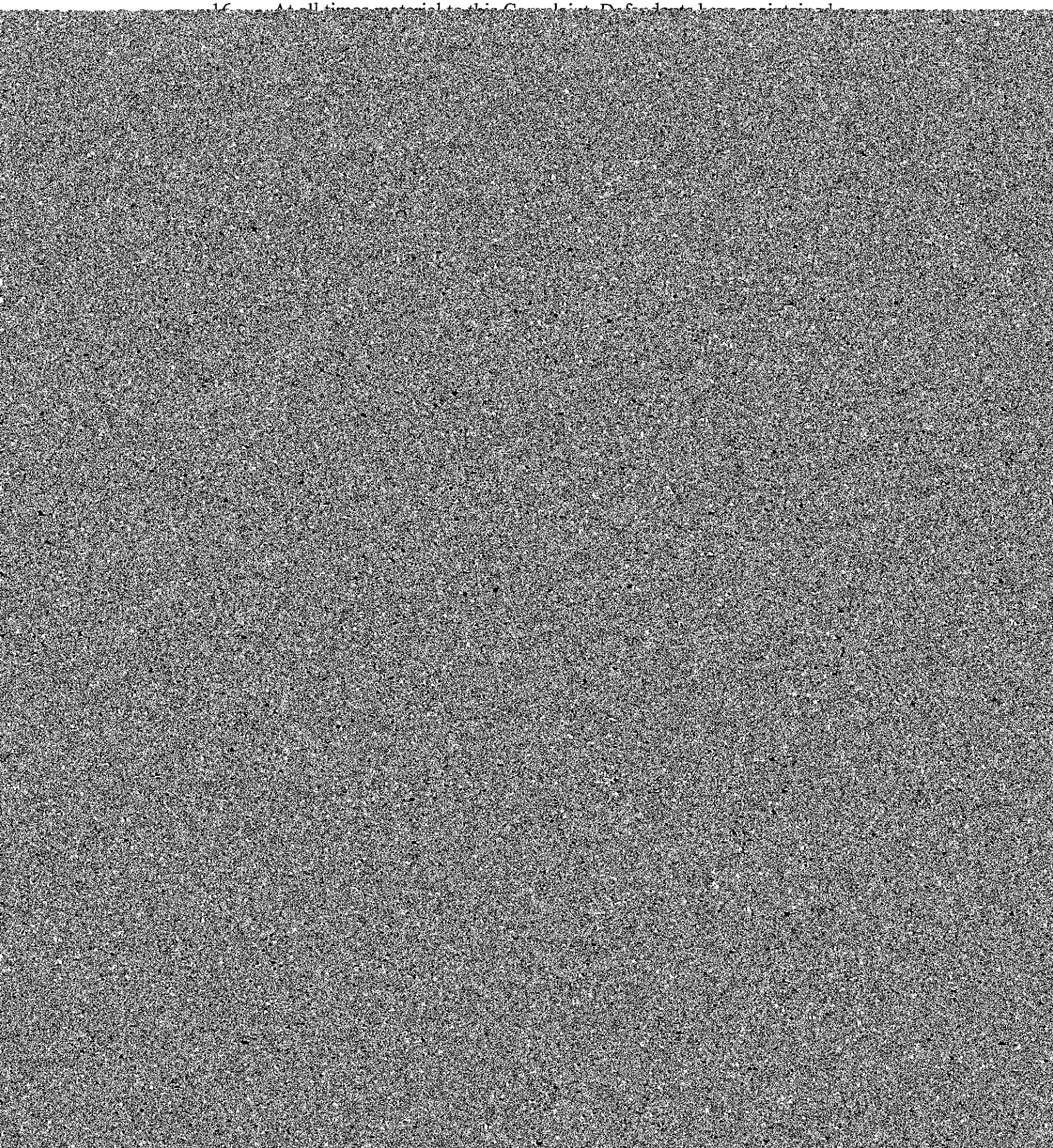








**COMMERCE**

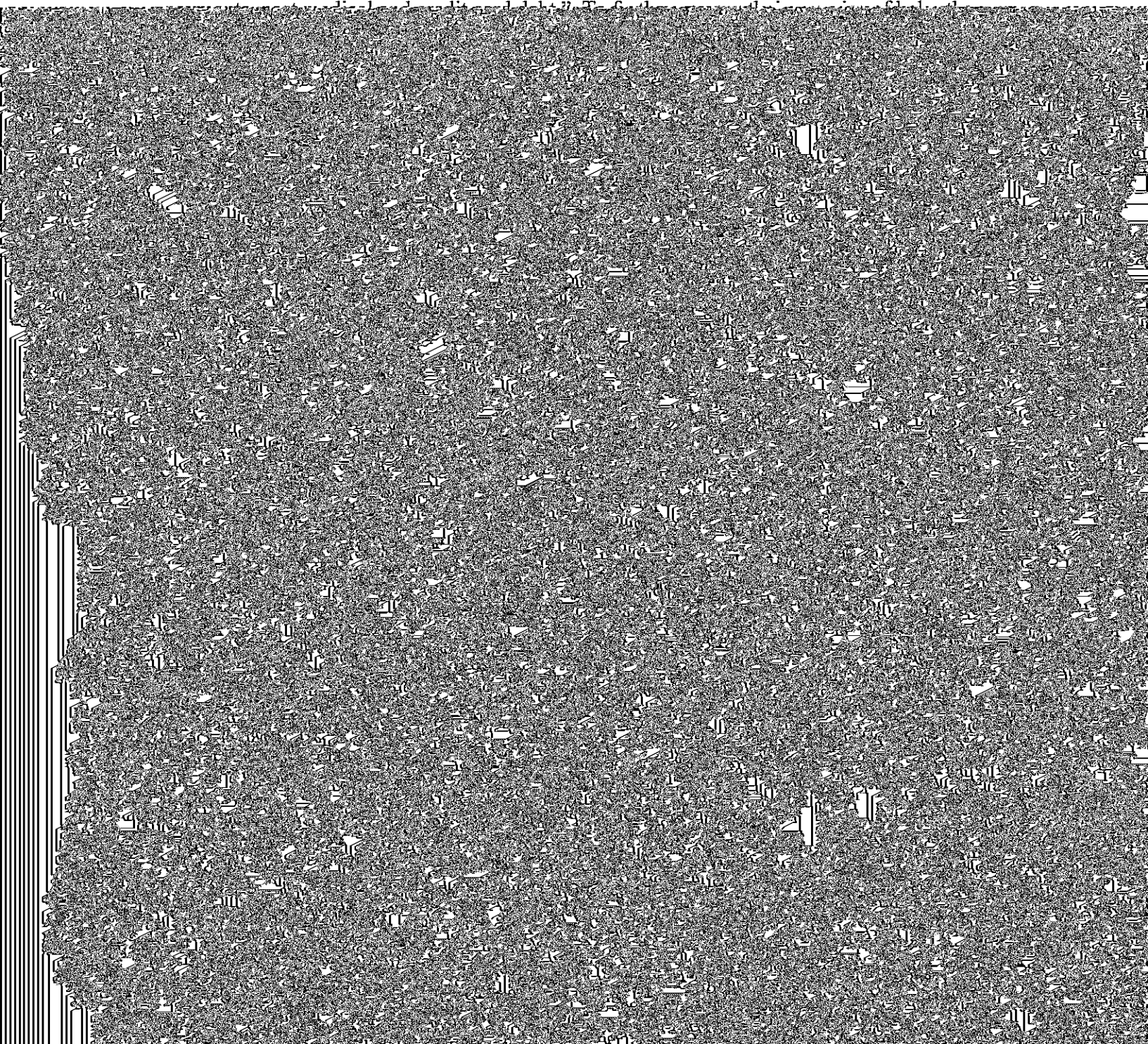


**DEFENDANTS' BUSINESS PRACTICES**

18. Since at least late 2008, Defendants have advertised, marketed, offered to

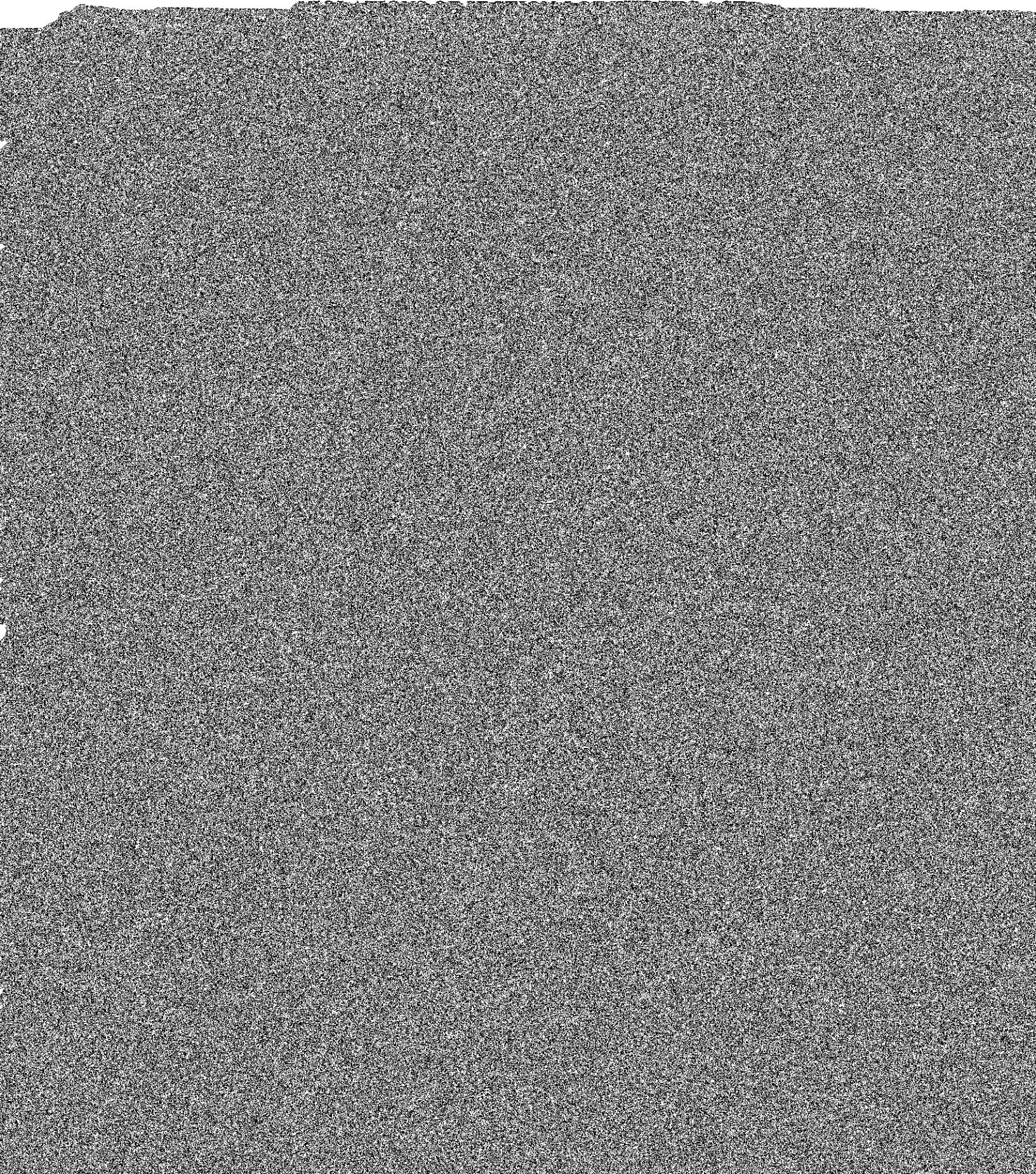


program “will enable you to either refinance your existing loan or restructure your loan to reduce your interest rate and lower your mortgage payment.” A postcard from March 2009 describes Defendants’ “New Start Program” as “a federal program designed for homeowners just like you who may have fallen behind on their mortgage. You have been selected to receive this offer to help relieve you from the burden of overdue mortgage

















Dated: 11/10/09

Respectfully submitted,