

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

STATE OF OHIO, ex rel.)	
ATTORNEY GENERAL)	
DAVE YOST)	CASE NO.
Attorney General of Ohio)	
30 E. Broad St., 14 th Floor)	JUDGE
Columbus, Ohio 43215)	
)	
Plaintiff,)	
)	
v.)	
)	
FCA US LLC,)	<u>COMPLAINT FOR DECLARATORY</u>
1000 Chrysler Drive)	<u>JUDGMENT, INJUNCTIVE RELIEF,</u>
Auburn Hills, Michigan 48326,)	<u>CONSUMER RESTITUTION AND</u>
)	<u>CIVIL PENALTIES</u>
FIAT CHRYSLER AUTOMOBILES N.V.,)	
25 St. James's Street)	
London SW1A 1HA)	
United Kingdom,)	
)	
V.M. MOTORI S.P.A.,)	
Via Ferrarese No. 29)	
44042 Cento, Ferrara)	
Italy,)	
)	
AND)	
)	
V.M. NORTH AMERICA, INC.)	
1000 Chrysler Drive)	
Auburn Hills, Michigan 48326)	
)	
Defendants.)	

Plaintiff, State of Ohio, by and through Attorney General Dave Yost, brings this action complaining of FCA US LLC ("FCA") and Fiat Chrysler Automobiles N.V. ("Fiat N.V." and, together with FCA, the "Fiat Defendants" or simply "Fiat"); and VM Motori S.p.A. ("VM Italy") and VM North America, Inc. ("VM America" and, together with VM Italy, the "VM Defendants" or simply "VM"), and states as follows:

I. INTRODUCTION

1. The Ohio Attorney General seeks relief for the massive and deliberate deception of consumers and regulators perpetrated by the aforementioned Defendants (collectively “FCA”) in relation to the certification, marketing, and sale to consumers of more than 100,000 model year (“MY”) 2014-2016 “EcoDiesel” Ram 1500 pickup trucks and Jeep Grand Cherokee sport utility vehicles (the “Diesel Vehicles”¹), including nearly 2,000 within the State of Ohio (the “Ohio Diesel Vehicles”).

2. Defendants designed, deployed and then concealed from the public and regulators multiple auxiliary emission control devices (“AECDs”) in the Diesel Vehicles’ electronic control modules. Those AECDs, when used alone or in combination with another device, operated as illegal “defeat devices:” software strategies that optimize emission controls during formal emissions test cycles so that emissions appear to be within legal limits while reducing emission controls outside of those test cycles (“off-cycle”) in normal, real-world operations.²

3. As a result of Defendants’ conduct, in real-world operation, the Diesel Vehicles emit 35 times the legal limits of harmful nitrogen oxides (“NO_x”).

4. Defendants engaged in this unlawful conduct in order to: (a) obtain through deceptive means the certification they needed from federal and state regulators to market and sell the

¹ The Diesel Vehicles include the following makes and models sold or leased in the United States for the 2014 through 2016 model years:

Model Year	EPA Test Group	Make and Model(s)	50 State Volume
2014	ECRXT03.05PV	FCA Dodge Ram 1500	14,083
2014	ECRXT03.05PV	FCA Jeep Grand Cherokee	14,652
2015	FCRXT03.05PV	FCA Dodge Ram 1500	31,984
2015	FCRXT03.05PV	FCA Jeep Grand Cherokee	8,421
2016	GCRXT03.05PV	FCA Dodge Ram 1500	32,219 (projected)
2016	GCRXT03.05PV	FCA Jeep Grand Cherokee	2,469 (projected)

² See Notices of Violation issued to Fiat and FCA by the U.S. Environmental Protection Agency and the California Air Resources Board on January 12, 2017 and a subsequent May 27, 2017 lawsuit filed by the U.S. Department of Justice on behalf of the EPA.

Diesel Vehicles in the United States, including within the State of Ohio; (b) conceal the fact that the Diesel Vehicles did not comply with applicable state and federal emission standards; and (c) mislead the public into believing that the vehicles, which they branded as “EcoDiesels,” were “clean” and “green” and therefore a good option for purchase by environmentally conscious consumers.

5. FCA repeatedly highlighted in its consumer marketing that the Diesel Vehicles met emission standards in all 50 states and improved performance and fuel economy, which the vehicles could do only by cheating during formal emissions testing.

6. In light of the unfair and deceptive acts and practices by Defendants, the State of Ohio seeks imposition of civil penalties, consumer restitution, and such injunctive and other equitable relief as may be determined to be appropriate and equitable in order to remedy, address, and prevent additional harm from Defendants’ unlawful conduct.

II. PARTIES

7. Plaintiff, State of Ohio, by and through Attorney General Dave Yost, is charged, inter alia, with the enforcement of the Ohio’s Consumer Sales Practices Act (“CSPA”), R.C. 1345.01 et seq., and its Substantive Rules, Ohio Administrative Code, 109:4-3-01 et seq. The Attorney General is the chief law enforcement officer of the State of Ohio and is authorized to bring this action pursuant to R.C. 109.02 and 1345.07.

8. Defendant Fiat N.V. was formed in October of 2014, when Fiat S.p.A. and Fiat Investments N.V. merged. Fiat N.V. is an international automotive group engaged in designing, engineering, manufacturing, distributing and selling new motor vehicles and vehicle components, among other things. Fiat N.V. is organized under the laws of the Netherlands and its principal executive offices are located in London, England. Fiat N.V. owns and controls defendants FCA, VM Italy and VM America.

9. Defendant FCA, formerly known as Chrysler Group LLC, is a Delaware limited liability company, with a principal place of business and headquarters located at 1000 Chrysler Drive, Auburn Hills, Michigan 48326. FCA is incorporated under the laws of the State of Delaware, and is an indirect, wholly-owned subsidiary of Fiat N.V. FCA is registered to do business in Ohio. Fiat N.V.'s predecessor, Fiat S.p.A., began its acquisition of Chrysler Group LLC in 2009 and completed it in January 2014, at which time Chrysler Group LLC became a wholly-owned indirect subsidiary of Fiat N.V. and was renamed FCA.

10. FCA designs, engineers, manufactures, distributes, warrants, sells, and makes available for lease new motor vehicles throughout the United States, including within the State of Ohio. In particular, FCA designed, manufactured, imported, distributed, warranted, offered for sale and/or lease, and sold and made available for lease the Diesel Vehicles – the EcoDiesel versions of the Ram 1500 and the Jeep Grand Cherokee – with the knowledge and intent to market and sell them in all 50 states, including through its car dealership agents in the State of Ohio.

11. VM Italy is an Italian corporation that, among other things, designs and manufactures diesel-fueled motor vehicle engines. In 2011, defendant Fiat N.V. (known as Fiat S.p.A. at the time) acquired a 50% ownership interest in VM Italy. In October 2013, VM Italy became an indirect wholly-owned subsidiary of Fiat N.V. VM Italy is an affiliate of FCA. The corporate headquarters of VM Italy is in Cento, Italy. VM Italy communicated regularly with FCA about the Diesel Vehicles.

12. VM America is a Delaware corporation and wholly-owned subsidiary of Fiat N.V., with a principal place of business at 1000 Chrysler Drive, Auburn Hills, Michigan 48326. VM America was created to support VM Italy's North American customers (in particular, FCA, and for a period of time, General Motors).

13. The VM Defendants designed, manufactured, calibrated, and delivered the EcoDiesel engine system for inclusion in the Diesel Vehicles, under the supervision of the Fiat Defendants, knowing and intending that the Diesel Vehicles, along with their engine system, would be marketed, distributed, warranted, sold and leased throughout all 50 states, including in the State of Ohio.

14. VM Italy transacts business in the United States. VM Italy employees have been physically present in Auburn Hills, Michigan, while working on engine calibration and air emissions issues related to the Diesel Vehicles. Some VM America employees working in Auburn Hills are also employees of VM Italy. VM Italy employees in Italy communicated regularly about the Diesel Vehicles with the VM America and VM Italy employees located in Auburn Hills.

15. At all relevant times, each of the Defendants worked in concert with the common objective of developing, marketing, selling, and leasing the Diesel Vehicles in the United States, including within the State of Ohio, including with the undisclosed AECDs and illegal defeat devices described in this Complaint. Each of the Defendants was, and still is, the agent of the others for this purpose, and each has acted, and is acting, for the common goals and profit of them all. All acts and knowledge ascribed to any one Defendant are properly imputed to the others.

III. JURISDICTION AND VENUE

16. This Court has jurisdiction over the subject matter of this action, personal jurisdiction over the Defendants, and authority to grant the relief requested pursuant to R.C. 1345.04. At all relevant times, Defendants have purposefully availed themselves of this forum. Among other things, Fiat N.V. controlled and/or directed its wholly-owned subsidiaries FCA and the VM

Defendants in their design, development, certification, marketing, offer, sale, and lease of the Diesel Vehicles within the State of Ohio.

17. In addition, FCA transacted business in the State of Ohio through numerous car dealerships, which act as FCA's agents in selling and leasing vehicles, including the Diesel Vehicles, in disseminating marketing messaging and materials and vehicle information to customers. Accordingly, the Court's exercise of jurisdiction over all Defendants is consistent with due process.

18. Venue lies in this Court pursuant to Ohio Civ. R. 3(C).

**IV. VEHICLE MANUFACTURERS MUST LIMIT HARMFUL NO_x EMISSIONS AND
DISCLOSE AECDs TO OBTAIN CERTIFICATION TO MARKET AND
SELL THEIR VEHICLES IN THE UNITED STATES.**

19. Vehicle manufacturers must certify to the U.S. Environmental Protection Agency ("EPA") and the California Air Resources Board ("CARB") that their motor vehicles comply with emission standards to obtain EPA-issued Certificates of Conformity ("COCs") and CARB-issued Executive Orders ("EOs"). The same standards also mandate certain durability requirements for the engine and its components.

20. Federal law requires manufacturers to disclose AECDs and prohibits the use of defeat devices.

21. An auxiliary emission control device or "AECD" is any element of design that senses temperature, vehicle speed, engine speed, transmission gear, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system.

22. Federal emission regulations require vehicle manufacturers to make extensive written disclosures regarding the existence, impact of, and justification for any devices, including AECDs, that affect the operation of the emission control system.

23. The EPA's emission certification requirements and test procedures further prohibit the use of all "defeat devices." A defeat device is any AECD that circumvents or reduces the effectiveness of the emission control system under normal vehicle operation and is not justified by one of four narrow conditions, none of which is applicable to the Diesel Vehicles at issue in this Complaint.

24. Vehicles equipped with defeat devices may not be certified for sale in the United States.

V. DEFENDANTS MADE FALSE AND MISLEADING CERTIFICATIONS AND REPRESENTATIONS TO REGULATORS AND THE PUBLIC CONCERNING THE DIESEL VEHICLES.

25. In or around 2009, Fiat set out to leverage the diesel experience it had developed designing vehicles to meet European emission standards by selling diesel passenger vehicles in the U.S. market.

26. Early in the development process, however, Defendants determined the emission control technology employed in their European engines could not meet U.S. emission standards while still achieving desired design and performance targets.

A. Defendants Used Defeat Devices to Cheat on Official Emissions Tests.

27. Rather than delay release and expend the time and effort required to develop vehicles that could meet these targets while also meeting legal emission and durability requirements, Defendants implemented multiple, undisclosed AECDs (the "Undisclosed AECDs"), when used with one or more other devices, constituted illegal defeat devices.

28. Notwithstanding the presence of multiple Undisclosed AECDs that functioned as defeat devices, FCA sought and obtained certification of the Diesel Vehicles under the EPA's and California's emission standards by submitting certifications like the ones below:

Defeat Device

Chrysler Group LLC states that any element of design, system, or emission control device installed on or incorporated in Chrysler Group LLC's new motor vehicles or new motor vehicle engines, for the purpose of complying with standards prescribed under Section 202 of the Clean Air Act, are not equipped with auxiliary emission control devices that can be classified as a defeat device as defined in 40 CFR §86.1803.01.

B. Once Caught in Their Deception, the Defendants Refused to Come Clean About the Defeat Devices.

29. In or around November and December 2015, the EPA conducted testing on four Ram 1500s in Ann Arbor, Michigan. All four Ram 1500s failed the EPA's NO_x testing. NO_x testing that FCA conducted on two Jeep Grand Cherokees likewise failed.

30. On or about May 27, 2016, the EPA sent FCA a letter identifying eight undisclosed AECDs in the Diesel Vehicles and further demanding an explanation why each should not be considered a "defeat device."

31. Subsequent explanations and disclosures proffered by FCA did not satisfy the EPA. On January 12, 2017, the EPA issued a Notice of Violation to Fiat N.V. and FCA ("EPA NOV") concluding:

To date, despite having the opportunity to do so, FCA has failed to demonstrate that FCA did not know, or should not have known, that a principal effect of one or more of these AECDs was to bypass, defeat, or render inoperative one or more elements of design installed to comply with emissions standards under the [Clean Air Act].

32. CARB issued a similar NOV the same day.

33. Laboratory and on-road testing conducted by the West Virginia University's Center for Alternative Fuels, Engines, and Emissions and other parties indicates that various models of the Diesel Vehicles, exhibited significantly increased NO_x emissions during on-road operation as compared to laboratory testing results.

VI. DEFENDANTS DEFRAUDED CONSUMERS BY PROMISING "CLEAN," "ECO-FRIENDLY" VEHICLES, WHICH IN FACT UNLAWFULLY POLLUTED THE AIR.

A. Defendants' "EcoDiesel" Branding Was Deceptive.

34. At all relevant times, to spur sales in the United States, FCA proudly touted the performance and reliability of its diesel vehicles and its purported environmental leadership, intentionally targeting its marketing to environmentally conscious consumers.

35. FCA knew that consumers associated diesel engines with pollution and sought to dispel them by branding the Diesel Vehicles as “environmentally friendly” “EcoDiesels.”

36. To drive home the purported clean, “green,” environmentally-friendly nature of its new engine, FCA also created an “EcoDiesel” badge that incorporated an image of a leaf, which FCA “intended to emphasize the ‘green’ and eco-friendly properties of the engine and bold, stylized interlocking letters, bordered by a trapezoid with interior asymmetrical outlining.”



37. From 2013 through 2016, FCA spent tens of millions of dollars to develop and place internet, television and print ads advertising the fuel efficiency, performance, and environmental hygiene of the Diesel Vehicles, to rebrand diesel as a clean-running, fuel-efficient, fun alternative to their gas and hybrid competitors and to associate the FCA brands with progressive ideals, environmental consciousness and innovation.

38. Print advertisements featuring images of evergreen forests and unspoiled fall foliage were overlaid with phrases like “love the planet along with great fuel economy” and “adhere to your principles and get extra points for embracing innovative technology”

39. The EcoDiesel campaign was a success: the Jeep Cherokee was named “2015 Green SUV of the Year,” and the Ram 1500 EcoDiesel was named “Green Truck of the Year,” by *Green Car Journal*. FCA seized on these titles to bolster its claims of eco-friendliness using images and messages like the ones pictured directly below:



GRAND EFFICIENCY.

We've set a new standard for diesel engines. Available on Grand Cherokee, the 3.0L V6 EcoDiesel engine offers Best-in-Class³ 30 hwy mpg fuel economy and 730-plus-mile driving range. Plus, *Green Car Journal* named it the 2015 Green SUV of the Year.TM



The image shows a close-up of a black Jeep engine cover. A green leaf is placed on the left side of the cover. The word "Jeep" is embossed on the left, and "DIESEL" is embossed on the right. At the bottom left, there is a "EcoDIESEL" badge. At the bottom right, there is a green globe icon above the text "2015 GREEN SUV OF THE YEAR™".



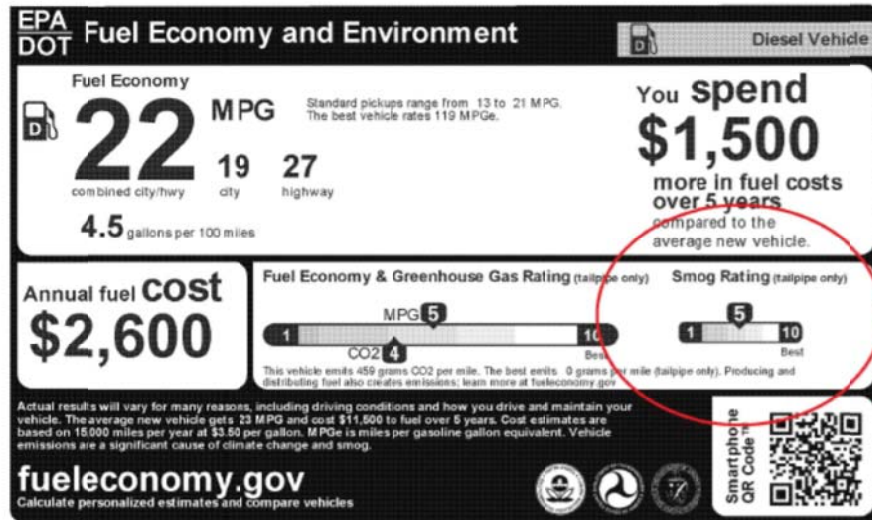
B. FCA Subjected Buyers and Lessees to False Representations and Warranties at the Point of Sale.

40. In addition to promoting sales through its misleading advertising campaigns, FCA knowingly subjected actual and potential buyers and lessees to additional misrepresentations at the point of sale and after.

41. Window stickers affixed to each of the Diesel Vehicles for sale or lease reflected average “smog ratings” when, in fact, the Diesel Vehicles’ NO_x emissions – a major factor in smog ratings – actually exceeded applicable standards.

For more information visit: www.ramtrucks.com
or call 1-866-RAMINFO

Chrysler Group LLC



42. These express warranties were categorically false in light of the installation and calibration of the Undisclosed AECDs.

C. FCA Trained Dealers to Push the “EcoDiesel” Message of Environmental Friendliness.

43. FCA instructed its dealers how to use the “EcoDiesel” moniker to foster positive feelings in potential buyers and how to overcome the most common negative stereotypes about diesel engine vehicles.

44. FCA created a 2-page “Hot Sheet” for the 2014 Jeep Grand Cherokee that contained FCA’s three key selling messages for the “EcoDiesel” powertrain: (1) best-in-class fuel economy, (2) best-in-class driving range, and (3) “cleanest diesel—lowest CO₂ versus competitive diesel UVs.” The hot sheet further instructed the FCA sales force to reinforce the message that EcoDiesel vehicles complied with “50 State emissions” laws thanks to the inclusion of the “DEF injection system & SCR catalyst.”

45. FCA gave dealer representatives attending the “Chrysler Academy” the 2014 Jeep Grand Cherokee Product Reference Guide that perpetuated FCA’s EcoDiesel advertising strategy, containing statements like:

- “DIRTY POLLUTER? – EXACTLY THE OPPOSITE – CLEANER AND MORE ECOLOGICAL THAN GASOLINE ENGINES.”
- “And, for buyers who respect the environment, they should know this is a very clean diesel...very green without question.”
- “And, for those with a strong sense of environmental responsibility, our three-liter EcoDiesel V6 engine runs exceptionally clean...”

46. FCA dealers employed this marketing strategy on consumers in each of the 50 states.

D. FCA’s “EcoDiesel” Campaign Worked.

47. Consumers purchased and leased Diesel Vehicles based on FCA’s false and misleading representations that the vehicles would be environmentally friendly and clean, fuel-efficient, and compliant with all applicable emission standards, and that they would provide superior performance.

48. Purchasers were willing to pay price premiums of thousands of dollars, depending on the model and trim packages, despite the fact that, unbeknownst to them, the Diesel Vehicles they purchased and leased were far from “Eco” friendly. Instead, they grossly violate emission standards during normal operations.

49. If Illinois consumers had known of the true effect of the defeat devices on the operation of the “clean diesel” engine systems and the true levels of pollutants the engines emitted, they would not have purchased or leased the Diesel Vehicles.

VII. CAUSE OF ACTION

**UNFAIR OR DECEPTIVE ACTS OR PRACTICES, IN VIOLATION OF THE OHIO
CONSUMER SALES PRACTICES ACT
(All Defendants)**

50. The State re-alleges the facts above and incorporates them herein by reference.

51. Subsection R.C. 1345.01(A) of the CSPA, defines “consumer transaction” as follows:

“Consumer transaction” means a sale, lease, assignment, award by chance, or other transfer of an item of goods, a service, a franchise, or

an intangible to an individual for purposes that are primarily personal, family, or household, or solicitation to supply any of these things.

R.C. 1345.01(A).

52. Defendants were “suppliers” as that term is defined in R.C. 1345.01(C), since Defendants, at all times relative hereto, was engaged in the business of effecting consumer transactions in the State of Ohio, to wit: manufacturing, assembling, advertising, marketing, promoting, selling, and distributing motor vehicles.

53. All of the acts and practices engaged in and employed by Defendants as alleged herein, are unfair or deceptive acts or practices affecting the conduct of any trade or commerce in Ohio, which are declared unlawful by R.C. 1345.02(A), R.C. 1345.02(B)(1), R.C. 1345.02(B)(2), and R.C. 1345.02(B)(9). Specifically, Defendants:

- a. Misrepresented, created false pretenses, and/or falsely certified and/or warranted the Diesel Vehicles’ compliance with applicable emission standards, certification, and/or other regulatory standards in warranties to consumers, on vehicle stickers, and in advertisements appearing in the stream of Ohio commerce;
- b. Sold, leased, and offered for sale or lease Diesel Vehicles that failed to comply with applicable emissions, certification, and/or other regulatory standards;
- c. Failed to disclose, omitted, concealed, and/or suppressed from federal environmental regulators the existence of the Undisclosed AECDs and their harmful environmental impact;
- d. Failed to disclose, omitted, concealed, and/or suppressed from consumers the existence of the Undisclosed AECDs and their harmful environmental impact and the fact that they were illegal to sell, lease or otherwise place into commerce in the State of Ohio;
- e. Falsely, unfairly and/or deceptively warranted to each buyer and lessor of a Diesel Vehicle, that the vehicle was designed, built, and equipped to conform, at the time of sale, to applicable emission standards and other applicable environmental standards;
- f. Falsely, unfairly and/or deceptively advertised, promoted, and warranted the Diesel Vehicles, as conforming and/or complying with applicable emission standards and other applicable environmental standards that allow automobiles to be placed into the stream of commerce in Ohio;

- g. Falsely and/or deceptively advertised, promoted, and warranted the Diesel Vehicles as “clean” and “green” despite the fact that, in regular driving, they emit NO_x at many multiples of the allowable amounts;
 - h. Falsely and/or deceptively advertised, promoted, and warranted the Diesel Vehicles by failing to disclose that certain performance measures could only be met when the Undisclosed AECDs were operating;
 - i. Caused a likelihood of confusion or misunderstanding as to the source, sponsorship, approval or certification of the Diesel Vehicles in regards to the following:
 - i. applicable emission standards;
 - ii. applicable environmental standards; and
 - iii. “pollution and impact on the environment;
 - j. Represented that the Diesel Vehicles had sponsorship, approval, characteristics, uses, benefits, or qualities that they did not;
 - k. Represented that the Diesel Vehicles were of a particular standard or quality when they did not have the represented particular standards or qualities;
 - l. Advertised the Diesel Vehicles with the intent not to sell them as advertised in regards to the following:
 - i. applicable emission standards;
 - ii. applicable environmental standards; and
 - iii. pollution and impact on the environment;
 - m. Advertised, sold, and leased the Diesel Vehicles and creating a likelihood of confusion or misunderstanding as to the following:
 - i. applicable emission standards;
 - ii. applicable environmental standards; and
 - iii. pollution and impact on the environment.
54. Defendants’ conduct was knowing and willful.
55. Defendants’ conduct has significantly harmed consumers in the State of Ohio, who did not receive the benefit of their bargain, and whose vehicles have suffered a diminution in value and who unwittingly bought and drove vehicles that violated the law and contributed to environmental harm notwithstanding that consumers believed they had purchased or leased an environmentally friendly vehicle.

56. Defendants have engaged in violations of the CSPA by making unfair, deceptive, false, or misleading statements; by omitting material information; and by engaging in unfair and deceptive trade practices, with respect to the Diesel Vehicles, since 2009, with multiple violations occurring on each and every day during this period.

57. Such acts and practices have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 et seq. Defendants committed said violations after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3).

VIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

- A. ISSUE A DECLARATORY JUDGMENT that each act or practice complained of herein violates the CSPA, R.C. 1345.01 et seq. and its Substantive Rules, Ohio Admin. Code 109:4-3-01 et seq. in the manner set forth in the Complaint;
- B. ISSUE PERMANENT INJUNCTIVE RELIEF, pursuant to R.C. 1345.07, enjoining Defendants, doing business under these names, or any other name(s), their agents, partners, representatives, salespersons, employees, successors and assigns and all persons acting in concert and participation with them, directly or indirectly, through any corporate device, partnership or association, in connection with any consumer transaction, from engaging in the acts or practices of which Plaintiff complains and from further violating the CSPA, R.C. 1345.01 et seq. and its Substantive Rules, Ohio Admin. Code 109:4-3-01 et seq., including, but not limited to, violating the specific statutes and rules alleged to have been violated herein;
- C. ASSESS, FINE and IMPOSE upon Defendants a civil penalty of Twenty-Five Thousand Dollars (\$25,000.00) for each separate and appropriate violation described herein pursuant to R.C. 1345.07(D);

- D. ORDER Defendants liable, pursuant to R.C. 1345.07(B), for reimbursement to all consumers found to have been damaged by Defendants' unfair and deceptive acts and practices.
- E. GRANT Plaintiff its costs in bringing this action;
- F. ORDER Defendants to pay all court costs associated with this matter;
- G. GRANT such other relief as the court deems to be just, equitable and appropriate.

Respectfully submitted,

DAVE YOST
Ohio Attorney General

/s/ Teresa A. Heffernan

MELISSA G. WRIGHT (0077843)
Section Chief
TERESA A. HEFFERNAN (0080732)
Principal Assistant Attorney General
Consumer Protection Section
30 East Broad Street, 14th Floor
Columbus, Ohio 43215
(614) 466-1305; (866) 521-9921 (facsimile)
melissa.wright@ohioattorneygeneral.gov
teresa.heffernan@ohioattorneygeneral.gov

Counsel for Plaintiff Ohio Attorney General