

Bipartisan Corporate Crime Fighting by the States

How Blue And Red State
Attorneys General Cooperate In Addressing
Big-Business Misconduct



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Cooperate In Addressing Big-Business Misconduct

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TABLE OF CONTENTS

Executive Summary 2

Overview of Findings 6

Most Penalized Parents 8

Repeat Defendants..... 9

Biggest Payouts 10

Most-Penalized Industries..... 11

Most Common Offense Types..... 12

Foreign Actors 13

Single-State Cases..... 14

Conclusion..... 15

Methodology..... 16

Appendix: Multistate AG Settlements..... 18

Endnotes..... 40

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EXECUTIVE SUMMARY

A detailed examination of lawsuits brought by the attorneys general of the 50 states and the District of Columbia finds that since the beginning of 2000 there have been 644 in which AGs from different states successfully cooperated on cases involving allegations of corporate misconduct. These prosecutions, which usually resulted in civil settlements in which the defendants did not admit guilt, often brought together AGs with divergent partisan affiliations. The total penalties paid by the companies was \$105.9 billion.

Among the 569 cases for which we were able to determine how many states were involved, 260 had as plaintiffs a majority of the country's state AGs. In 172 of the cases, 40 or more states cooperated, yielding \$20 billion in penalties. For example, cases against pharmaceutical companies for promoting unapproved uses of drugs have averaged 42 states per settlement.

State AGs are split almost evenly between Democrats and Republicans, meaning that the cases with large numbers of state participants are necessarily bipartisan. Democratic and Republican AGs frequently serve side-by-side as the lead states that negotiate settlements on behalf of the larger groups.

The states that most often take a lead position – New York and California – have long had Democratic AGs. But Ohio, another frequent leader, has had both Republican and Democratic AGs in the period we examined. In the 100 largest settlements, New York has been a leader in 25 cases, followed by California with 15. Illinois, Iowa and Ohio have each been among the leaders in six of the cases.

In more than 80 percent of the multistate AG cases, accounting for 98 percent of total dollar penalties, the targets were large corporations. In 362 of the cases, the defendants were giant companies included in the Fortune 500 or the Fortune Global 500.

The parent company with the most cumulative penalties is, by far, Bank of America, with more than \$26 billion in settlements over issues such as mortgage abuses and the sale of toxic securities. It is followed by the Swiss bank UBS (\$11 billion), Citigroup (\$8 billion), JPMorgan Chase (\$6 billion) and BP (\$4.9 billion).

The most frequent defendant has been CVS Health, which has paid out more than \$215 million in 14 settlements, most of them involving the alleged submission of false claims to state Medicaid programs and the payment of illicit kickbacks to healthcare providers. Another 47 parent companies have been involved in three or more multistate AG cases.

In 118 multistate AG cases, corporations have paid penalties of \$100 million or more; in 19 of these the amount exceeded \$1 billion. The

biggest individual settlement was an agreement by UBS to repurchase \$11 billion in investments known as auction-rate securities whose safety it allegedly misrepresented to investors. The second largest was an \$8.7 billion agreement by Bank of America to resolve claims relating to predatory home mortgage practices by its Countrywide Financial subsidiary.

Banks and other financial services companies account for far and away the largest monetary share of penalties paid in multistate AG cases—\$70 billion from 122 settlements involving 65 different parent companies. In second place is the pharmaceutical industry with \$10.4 billion in penalties from 137 settlements.

Consumer protection and price-fixing cases are the most numerous kinds of multistate AG lawsuits, but investor protection and mortgage abuse lawsuits against the big banks have generated the greatest monetary penalties.

In most years since the early 2000s, state AGs have obtained between \$1.3 billion and \$3.2 billion in total multistate penalties, though there have been fluctuations above that range. The biggest year was 2008, when a series of massive settlements relating to the sale of auction-rate securities by several banks brought the annual total up to a remarkable \$50 billion.

In 243 of the multistate cases, the U.S. Department of Justice or another federal agency was also involved in the settlement and often led the negotiations. These actions, which accounted for \$31 billion of the \$105 billion in total penalties, included cases in which the federal entity, usually DOJ, initiated the investigation and brought in the states -- as well as ones in which federal and state

prosecutors were involved from the start. Federal involvement has spanned Democratic and Republican presidencies.

There is every reason to believe that the number of multistate AG settlements will continue to grow. The tentative settlement with Purdue Pharma, as well as emerging antitrust investigations of the tech sector, could add many billions more to the penalty totals.

Single-State Settlements

The 644 multistate settlements represent a subset of more than 7,600 state AG cases we compiled for an expansion of our Violation Tracker database. In the period since 2000, the largest number of single-state AG announcements we found came from the following states: Massachusetts (1,765), New York (1,128), Connecticut (632) and Missouri (408).

In total-dollar terms, the leaders are: New York (\$9.8 billion), California (\$7.5 billion), Massachusetts (\$2.6 billion) and Mississippi (\$2.0 billion).

The largest single-state case we found was a \$1.6 billion settlement that New York, in cooperation with the Securities and Exchange Commission, reached with American International Group in 2006 to resolve allegations of fraud and bid-rigging. We found six other single-state settlements worth \$750 million or more.

While multi-state cases almost always result in civil settlements, more than 500 of the single-state cases ended with fines or court verdicts. About 70 of these were filed as criminal matters.

Note: A list of the 644 multistate AG settlements can be found at the Appendix. More details on the cases are in their entries in Violation Tracker, along with the 7,000 single-state AG cases. Violation Tracker (violationtracker.org) is a free database on corporate misconduct produced by the Corporate Research Project of Good Jobs First.

INTRODUCTION

In May 2019, Washington State Attorney General Bob Ferguson touted what he called his 22nd legal victory against the Trump Administration.¹ These suits, often filed in cooperation with other blue states, have dealt with hot-button policy issues such as the administration's efforts to roll back environmental regulations and its ban on travelers from majority-Muslim countries.

In February 2018, a group of 20 red states filed a lawsuit in federal court challenging the constitutionality of the Affordable Care Act, basing their argument on the fact that the Trump tax plan passed by Congress did away with the penalty for individuals who did not purchase coverage.²

Such lawsuits, in which states with a similar ideological orientation band together to oppose or support some aspect of federal policy, have become a familiar story and are often used as evidence of the increasingly polarized state of contemporary America.³

That is true enough. Yet the very same state attorneys general, who across the country are almost evenly split between Democrats and Republicans, frequently cross partisan lines to join with their counterparts in bringing lawsuits against a different category of defendants: large companies engaged in questionable practices in multiple states.⁴ Our compilation of settlements and judgments won by the states over the past 19 years makes it clear: both liberals and conservatives have an interest in stopping corporate misconduct.⁵

The position of attorney general originated in England, where a person with that title represented the sovereign's interests in the courts and later

became responsible for the public's interests as well. In the United States, the position of state attorney general as a representative of the people dates back to the beginning of the republic, when it was enshrined in state constitutions or statutes.

The powers given to AGs varied substantially from state to state, but for the first two centuries of the country's existence these officials usually did not make much of an impact. That began to change in the 1980s, when some AGs began to focus on bigger targets, especially large corporations. This was prompted by the regulatory rollbacks of the Reagan Administration, which slashed the staff of agencies such as the Federal Trade Commission. As the federal government pulled back from corporate oversight, state AGs decided they needed to step in to fill the void, especially with regard to consumer protection and antitrust issues.⁶

Recognizing the difficulty of bringing actions against deep-pocketed companies with armies of lawyers, state AGs began to cooperate with one another. At first it was simply a matter of sharing information about their own separate investigations, but eventually groups of state AGs began to prosecute cases jointly in what became known as multistate litigation.

The initial cases were relatively modest in scope. For example, in 1983, a group of six states reached a \$5 million settlement with Toyota dealers to resolve allegations of price-fixing for undercoating services.⁷ A price-fixing suit against Japanese camera company Minolta and its dealers yielded a \$7 million settlement.

Eventually the state AGs, encouraged by a revived National Association of Attorneys General, grew more ambitious. In the mid-1990s, in the wake of revelations that the big tobacco companies deliberately suppressed information about the harmful effects of their products, states began suing the likes of Philip Morris and R.J. Reynolds. This evolved into multistate litigation that the industry was unable to defeat. In 1998, a group of 46 states signed a settlement under which cigarette manufacturers agreed to pay a minimum of \$206 billion over 25 years, in part to help pay for the healthcare costs of state residents suffering from tobacco-related illnesses.

State AGs have never had another recovery close to that amount, but the tobacco deal paved the way to hundreds of additional settlements against scores of large corporations involved in many types of misconduct. In this report we analyze more than 600 successful multistate AG lawsuits dating back to the beginning of 2000.

There is every indication that this kind of litigation will continue to grow. Indeed, in September 2019 as this report is being written, there are numerous pending cases, including a few that some observers think could rival the tobacco deal in size.

In May 2019, a coalition of 44 states sued the largest generic drug manufacturers, alleging that they conspired for years to inflate prices. Both state and local governments across the country have reached a tentative multi-billion-dollar settlement with Purdue Pharma for contributing to the opioid epidemic. In August 2019 Oklahoma won a single-state verdict of \$572 million against Johnson & Johnson, which is planning to appeal.⁸ Suits brought by other states against the company could result in a multistate settlement.

Multistate litigation is also eyeing the tech sector. State AGs are investigating antitrust issues involving companies such as Facebook, Apple, Amazon.com and, especially, Google parent Alphabet Inc.⁹

While partisan divisions in the country at large remain strong, multistate AG litigation is an arena in which political differences can be put aside in pursuit of a common effort to fight price-fixing, foreclosure abuses, the sale of unsafe drugs and other forms of corporate wrongdoing.

OVERVIEW OF FINDINGS

An examination of announcements issued by the attorneys general of the 50 states and the District of Columbia finds that, since the beginning of 2000, there have been 644 lawsuits in which AGs from different states successfully worked together to address corporate misconduct (see the list in the Appendix). These cases, covering a wide variety of offenses, have resulted in penalties against companies totaling \$105.9 billion, almost entirely through civil settlements in which the defendants did not admit guilt.

In more than 80 percent of the cases (536 of 644), accounting for 98 percent of the total dollar penalties, the targets were large corporations. In 362 of the cases, the defendants were giant companies in the Fortune 500 or the Fortune Global 500.

In most years since the early 2000s, state AGs have obtained between \$1.3 billion and \$3.2 billion in total multistate penalties, though there have been fluctuations above that range. The biggest year was 2008, when a series of massive settlements relating to the sale of risky investments known as auction-rate securities brought the annual total up to a remarkable \$50 billion.

The annual totals have slipped in the past few years, but there is no indication of a long-term decline or a retreat from prosecution on the part of the state AGs. In fact, penalty totals could rise dramatically from pending cases against pharmaceutical companies.

Among the 569 cases for which we were able to determine how many states were involved, 260 included a majority of the country's state AGs as plaintiffs.¹⁰ These were instances in which state

leaders with very different partisan affiliations worked together to address business misbehavior. In 172 cases there were 40 or more state participants.

These participation figures are based on information included in press releases issued when the settlements were first announced. Additional states sometimes piggyback onto settlements later, so the final participation rates are often much higher.

The 260 cases with a majority of the states participating yielded penalties of more than \$23 billion; those in which 40 or more states participated yielded \$20 billion of that amount.

One or more states typically take the lead in negotiating settlements on behalf of the larger groups. The states that most often take a lead position – New York and California – have long had Democratic AGs, but in Ohio, another frequent leader, there have been both Republican and Democratic AGs in the period we examined. In the 100 largest settlements, New York has been among the leaders in 25 cases, followed by California with 15. Illinois, Iowa and Ohio have each been among the leaders in six of the cases.

In 243 of the multistate cases, the U.S. Department of Justice or another federal agency was involved in the settlement and often led the negotiations. These actions, which accounted for \$31 billion of the \$105 billion in total penalties, included cases in which the federal entity, usually DOJ, initiated the investigation and brought in the states -- as well as ones in which federal and state prosecutors were involved from the start. Federal involvement has spanned Democratic and Republican presidencies.¹¹

The breadth of state participation also reflects the scope of the business operations of the defendant company and the nature of the offense. For example, environmental cases, which often cover violations at specific plants in a limited number of locations, averaged seven states per settlement. But cases against pharmaceutical companies for promoting unapproved uses of drugs, because they are sold nationwide, have averaged 42 states per settlement.

Table 1. Annual Multistate AG Penalty Totals

Year	Penalty Total	Cases
2000	\$645,264,999	33
2001	\$257,446,440	22
2002	\$2,389,949,948	31
2003	\$2,644,075,000	31
2004	\$1,574,846,384	21
2005	\$3,040,271,000	33
2006	\$1,520,510,782	37
2007	\$5,128,704,912	22
2008	\$50,553,881,999	46
2009	\$1,971,813,620	40
2010	\$4,567,787,675	46
2011	\$1,354,659,915	34
2012	\$10,519,664,488	38
2013	\$3,226,116,966	35
2014	\$2,475,654,596	36
2015	\$6,375,417,139	41
2016	\$2,282,908,634	34
2017	\$2,159,404,963	31
2018	\$1,724,448,046	14
2019*	\$1,462,534,959	19

*through August

MOST PENALIZED PARENTS

The parent company with the most cumulative penalties in cases involving multiple state attorneys general is, by far, Bank of America.¹² BofA and its subsidiaries have been penalized a total of more than \$26 billion in ten multistate AG cases, including six worth \$1 billion or more. The largest of the penalties involved more than \$8 billion in loan relief its subsidiary Countrywide Financial agreed to in a 2008 settlement with 11 states to resolve claims relating to predatory mortgage lending practices.

The other parent with an eleven-figure total is the Swiss bank UBS, most of whose penalties came from a single 2008 case in which it agreed to repurchase \$11 billion in illiquid auction-rate securities nationwide.¹³ The company had been accused of misrepresenting the safety of the investments.

Next on the list (see Table 2) are two other giant U.S.-based banks. Citigroup racked up \$8.2 billion in penalties from six cases, including a \$7 billion auction-rate securities repurchase of its own. The largest portions of JPMorgan Chase's \$6 billion total came from another auction-rate securities repurchase as well as its share of the state portion of the 2012 national mortgage settlement.

BP ranks fifth on the list as a result of its \$4.9 billion settlement with the five Gulf states in connection with the 2010 Deepwater Horizon oil spill disaster. It is followed by the utility company American Electric Power, which in 2007 agreed to spend \$4.6 billion on new emissions controls at its power plants as part of the settlement of multistate air pollution litigation.

Table 2. Parent Companies with \$1 Billion or More in Multistate AG Penalties

Parent	Penalty Total	Cases
Bank of America	\$26,114,848,408	10
UBS	\$11,393,380,000	5
Citigroup	\$8,231,391,577	6
JPMorgan Chase	\$6,208,338,661	10
BP	\$4,910,000,000	2
American Electric Power	\$4,687,500,000	3
Morgan Stanley	\$4,060,000,000	3
Goldman Sachs	\$3,690,833,333	3
Deutsche Bank	\$3,648,333,333	3
Wells Fargo	\$1,872,683,716	8
Enron	\$1,520,000,000	1
Pfizer	\$1,451,492,204	13
Kinder Morgan	\$1,450,000,000	1
GlaxoSmithKline	\$1,024,602,391	11

Rounding out the rest of the ten most penalized parent companies are four more banks: Morgan Stanley, Goldman Sachs, Deutsche Bank and Wells Fargo.

REPEAT DEFENDANTS

Many parent companies have found themselves the target of a multistate AG investigation more than once. Ninety-nine parents have been involved in two or more settlements. Of those, 48 have been involved in three or more; 28 in four or more; 22 in five or more; and 15 in six or more.

The most frequent defendant has been CVS Health, which has paid out more than \$215 million in 14 settlements, most of them involving the submission of false claims to state Medicaid programs and the payment of illicit kickbacks to healthcare providers.

False claims and kickbacks, along with drug safety and anti-competitive practices, were also the focus of most of the settlements involving pharmaceutical manufacturers, including: 13 linked to Pfizer, 11 to GlaxoSmithKline, 9 to Merck, 8 to Johnson & Johnson, and 7 to Allergan.

Also high on the list of recurring defendants are the big banks, including: Bank of America and JPMorgan Chase (each with 10 settlements), Wells Fargo (8) and Citigroup (6).

Table 3. Parent Companies with Six or More Multistate AG Settlements

Parent	Cases	Penalty Total
CVS Health	14	\$215,960,166
Pfizer	13	\$1,451,492,204
GlaxoSmithKline	11	\$1,024,602,391
Bank of America	10	\$26,114,848,408
JPMorgan Chase	10	\$6,208,338,661
Merck	9	\$1,012,946,482
Wells Fargo	8	\$1,872,683,716
Johnson & Johnson	8	\$993,681,516
Allergan	7	\$203,350,000
Citigroup	6	\$8,231,391,577
Teva Pharmaceutical Industries	6	\$428,800,000
Endo International	6	\$401,800,000
Bayer	6	\$145,560,000
Sanofi	6	\$115,192,600
Walgreens Boots Alliance	6	\$100,210,000

BIGGEST PAYOUTS

We discovered 118 multistate AG cases in which corporations paid penalties of \$100 million or more; in 19 of these, the amount exceeded \$1 billion.

The largest of these settlements are ones mentioned above: the \$11 billion repurchase of illiquid auction-rate securities by UBS; the \$8.7 billion in loan relief agreed to by Bank of America's Countrywide Financial subsidiary; Citigroup's \$7 billion auction-rate securities case; BP's \$4.9 billion settlement with the states affected by the Deepwater Horizon disaster; and American Electric Power's agreement to spend more than \$4 billion on new emissions controls.

Table 4. Multistate AG Settlements Above \$1 Billion

Parent	Settlement Amount	Year
UBS	\$11,150,000,000	2008
Bank of America	\$8,680,000,000	2008
Citigroup	\$7,100,000,000	2008
BP	\$4,900,000,000	2015
American Electric Power	\$4,675,000,000	2007
Bank of America	\$4,550,000,000	2008
Morgan Stanley	\$3,535,000,000	2008
JPMorgan Chase	\$3,525,000,000	2008
Bank of America	\$3,458,333,333	2008
Goldman Sachs	\$3,355,833,333	2008
Deutsche Bank	\$3,348,333,333	2008
Bank of America	\$3,004,100,000	2010
Bank of America	\$2,430,000,000	2012
Bank of America	\$2,382,415,075	2012
Enron	\$1,520,000,000	2005
Kinder Morgan	\$1,450,000,000	2003
JPMorgan Chase	\$1,121,188,661	2012
JPMorgan Chase	\$1,066,000,000	2013
Wells Fargo	\$1,005,233,716	2012

MOST-PENALIZED INDUSTRIES

Banks and other financial services companies account for far and away the largest share of penalties paid in multistate AG cases—\$70 billion from 122 settlements involving 65 different parent companies. Most of the penalties were imposed in the giant auction-rate securities and mortgage abuse cases.

In second place is the pharmaceutical industry with \$10.4 billion in penalties from 137 settlements involving 34 different parents. These cases overwhelmingly concerned alleged false claims submitted to state Medicaid programs and were often linked to illegal practices such as the promotion of drugs for unapproved uses and the payment of kickbacks to healthcare providers.

Next is the utility sector, whose \$6.9 billion total derives from a much smaller number of cases – 12 involving just seven parents. Among those are only four settlements worth \$100 million or more. Along with the already-discussed \$4.7 billion American Electric Power case and the \$1.5 billion Enron settlement, those include a \$460 million settlement signed by NRG Energy’s Reliant Energy subsidiary and a \$207 million Duke Energy settlement, both of which stemmed from the West Coast energy crisis of 2000-2001.

The oil and gas industry ranks fourth with \$5.4 billion in penalties from 21 cases, by far the largest of which was BP’s \$4.9 billion Deepwater Horizon settlement. A subsidiary of Williams Companies paid \$417 million in 2002 to settle a market-manipulation case brought by California, Oregon and Washington.

Table 5. Industries with \$1 Billion or More in Multistate AG Settlements

Parent Industry	Penalty Total	Cases
financial services	\$70,440,695,453	122
pharmaceuticals	\$10,357,918,691	137
utilities and power generation	\$6,946,600,000	12
oil and gas	\$5,411,811,630	21
pipelines	\$1,456,900,000	2
electrical and electronic equipment	\$1,344,525,655	20
information technology	\$1,179,727,350	9
motor vehicles	\$1,050,268,320	9
miscellaneous services	\$1,003,223,913	15

MOST COMMON OFFENSE TYPES

Given that consumer protection is one of the key concerns of state AGs, it is no surprise that this category accounts for the largest number of multistate settlements – 166 of the 644 we identified.¹⁴ A related category – price-fixing and other anti-competitive practices – accounts for the second largest number, 105. False claims cases—those involving misconduct by government contractors, including healthcare companies billing state Medicaid programs – rank third with 103 cases.

Yet when it comes to penalty dollar totals, these three categories – each of which accounts for about \$4 billion in settlements – are well behind several other categories with many fewer cases but much higher average settlement amounts.

Chief among these is the category we call investor protection, which accounts for more than \$46 billion in penalties. It covers settlements such as the auction-rate securities cases in which AGs won relief for state pension funds and private investors affected by misconduct on the part of investment banks.

The second biggest category, with more than \$18 billion in penalties, covers mortgage abuses, especially by Bank of America and its subsidiary Countrywide. The third biggest category, with \$11 billion, consists of environmental violations. Apart from the BP and American Electric Power cases cited above, major settlements in this area include the \$570 million state portion of the payouts by Volkswagen for emissions cheating and a 2003 agreement by Archer Daniels Midland to spend \$340 million on new air pollution controls.

The rankings in Table 6 reflect the surge in big investor protection settlements that were clustered in 2008. Since then, the mix of offense types has changed substantially. For the period since 2009, mortgage abuses account for the largest share of penalties, and environmental violations move up to second.

Table 6. Primary Offense Types with \$1 Billion or More in Multistate AG Settlements

Primary Offense	Penalty Total	Cases
investor protection violation	\$46,861,727,999	35
mortgage abuses	\$18,594,407,454	15
environmental violation	\$11,186,197,252	72
off-label or unapproved promotion of medical products	\$4,928,830,800	44
price-fixing or anti-competitive practices	\$4,211,926,189	105
False Claims Act	\$4,210,162,981	103
energy market manipulation	\$4,054,500,000	5
consumer protection violation	\$3,650,256,268	166
toxic securities abuses	\$2,696,750,000	5
kickbacks and bribery	\$1,079,282,807	20
securities issuance or trading violation	\$1,061,300,000	6

FOREIGN ACTORS

Parent companies headquartered outside the United States account for 206 of the multistate AG settlements, with total penalties of \$31 billion. The country with the largest portion, \$12 billion, is Switzerland, mostly as a result of UBS's \$11 billion auction-rate securities settlement. Among the eight other Swiss parents on the list are Credit Suisse and Novartis, each with about \$200 million in penalties.

The second largest portion comes from Britain, whose \$7 billion comes to a great extent from BP's \$4.9 billion Deepwater Horizon settlement. There are 12 other British-based corporations on the list, most notably GlaxoSmithKline, whose 11 settlements generated more than \$1 billion in penalties.

Two other countries account for \$1 billion or more in penalties: Germany, whose \$5 billion total came mostly from Deutsche Bank, and Japan, whose \$1.4 billion came from 33 cases, the largest of which was the \$650 million settlement paid by the parent of automotive airbag maker Takata.

Table 7. Parent Company Home Countries Accounting for the Most Multistate AG Penalties

Parent Country	Penalty Total	Cases
USA	\$72,721,037,976	330
Switzerland	\$12,262,742,902	23
Britain	\$7,790,630,384	32
Germany	\$5,262,500,017	27
Japan	\$1,394,015,321	33
Canada	\$875,715,000	8
South Korea	\$801,195,162	5
consumer protection violation	\$3,650,256,268	166
toxic securities abuses	\$2,696,750,000	5
kickbacks and bribery	\$1,079,282,807	20
securities issuance or trading violation	\$1,061,300,000	6

SINGLE-STATE CASES

While compiling the list of multistate AG cases analyzed in this report, we also collected information on settlements reached by states acting alone. Through this process we created 7,000 entries, with \$37 billion in total penalties, that have been added to our Violation Tracker database.

In the period since January 1, 2000, seven states have announced 250 or more cases they handled on their own (or in some cases in cooperation with the federal government). They are shown in Table 8.

Table 8. States That Have Announced 250 or More Single-State AG Settlements

State	Cases	Penalty Total
Massachusetts	1,765	\$2,652,455,086
New York	1,128	\$9,822,804,234
Connecticut	632	\$964,596,962
Missouri	408	\$481,380,480
Wisconsin	354	\$172,256,753
New Jersey	324	\$1,192,878,876
California	275	\$7,463,302,048

The penalty amounts in single-state cases are, of course, usually much smaller than those in multistate actions, yet some states have reached substantial settlements on their own. The seven states shown in Table 9 have each generated \$1 billion or more in penalties since 2000.

Table 9. States with \$1 Billion or More in Single-State AG Settlements

State	Penalty Total	Cases
New York	\$9,822,804,234	1,128
California	\$7,463,302,048	275
Massachusetts	\$2,652,455,086	1,765
Mississippi	\$1,973,055,700	37
Ohio	\$1,423,258,502	93
Texas	\$1,237,168,840	112
New Jersey	\$1,192,878,876	324

The largest single-state case we found was a \$1.6 billion settlement New York, in cooperation with the Securities and Exchange Commission, reached with American International Group in 2006 to resolve allegations of fraud and bid-rigging. As shown in Table 10, we found six other single-state settlements worth \$750 million or more.

Table 10. Single-State AG Cases with Penalties of \$750 Million or More.

State	Company	Penalty	Year
New York	American Int'l. Group	\$1,619,000,000	2006
Mississippi	BP	\$1,500,000,000	2015
California	Wells Fargo	\$1,400,000,000	2009
California	Corinthian Colleges, Inc.	\$1,170,025,000	2016
Minnesota	3M	\$850,000,000	2018
New York	Marsh & McLennan Companies	\$850,000,000	2005
California	Powerex	\$750,000,000	2013

CONCLUSION

A review of multistate litigation over the past two decades makes it clear that state AGs have become crucial players in the effort to combat corporate misconduct. They have taken on hundreds of large companies from numerous industries engaged in practices that harm consumers, workers, and communities. They have recouped billions of dollars in penalties and have gotten corporations to at least promise to change their practices.

As with all enforcement efforts, however, there is a question as to whether some large companies ever really clean up their act. The fact that some have paid out AG settlements repeatedly raises the question of whether they are refusing to make meaningful reforms and are instead treating the penalties as the cost of continuing to do business as usual.

Even if these settlements do not completely solve the problem of corporate malfeasance, they put some pressure on bad actors and are worth continuing.

States AGs, in fact, show no signs of relenting. They are engaged in big new investigations on issues such as the excessive market power of the big tech companies, and before long there are likely to be new billion-dollar settlements to add to the list.

Moreover, these new investigations are bipartisan. It is encouraging to see that in at least one area, ideological differences can be put aside for the sake of the public good.

METHODOLOGY

To achieve our aim of compiling a list of successful cases brought against corporations by state attorneys general, we took advantage of the fact that most AGs are not bashful about publicizing their accomplishments. They issue frequent press releases and post them on their websites. We extracted relevant information from those documents to create entries for our database and this report.

Many of these releases are about cases outside the scope of our research, such as street crime or court actions by AGs to challenge a federal policy. We thus needed to scan many thousands of documents to find the relevant announcements.¹⁵

Our review of the releases from all 50 states and the District of Columbia yielded a total of more than 7,600 applicable cases dating back to the beginning of 2000. Entries for all those cases have been added to Good Jobs First's online database Violation Tracker. In this report we analyze a 644-case subset: those cases that were brought by more than one state AG.

When multistate settlements or verdicts are made public, it is not unusual for numerous AGs to issue similar press releases, especially those whose offices were most involved in the investigation and settlement negotiations. Some AGs are diligent in mentioning their partners and will often note how many states were involved. Other AGs releases make it sound more like an individual accomplishment. We thus needed to review each announcement carefully to see whether it should be added to the single-state or the multistate list.¹⁶

A few AG offices, such as those in New York and California, maintain a deep archive of press releases

on their websites, so we were readily able to find documents going back to our starting point of January 1, 2000. In numerous other states, when a new AG takes office the predecessor's press releases are removed from the site. We addressed these gaps as follows.

First, we used the Wayback Machine at archive.org to resurrect earlier versions of AG press release collections. We derived almost half of our 7,000 entries from these archived pages.

For periods in which the Wayback Machine did not provide coverage, we relied on the various state AG press release collections compiled by newswire services such as States News Service, US States News and Targeted News Service, all of which we accessed via Nexis.com.

Because these newswire collections vary greatly in completeness from state to state and usually do not extend all the way back to 2000, we were still left with some gaps, especially for earlier years. We filled those by using the Associated Press archives on the subscription service Nexis.com.

We also consulted two other sources: the Multistate Litigation Database compiled by Paul Nolette of Marquette University (which runs to 2013) and the State Antitrust Litigation Database compiled by the National Association of Attorneys General.¹⁷

The state AG entries are structured like the other entries we have created for Violation Tracker. From the press release or newswire article, we obtained the name of the defendant company, the date of the settlement, the dollar amount paid by the company, and a brief description of the case, including an

indication of whether it was brought as a civil or a criminal matter.¹⁸ Based on that content, we assigned a primary offense type to the case from our list of more than 90 categories; when appropriate we assigned a secondary offense type as well.¹⁹ We also captured the URL of the press release, so that users of Violation Tracker can always link back to the original source.²⁰

All the state AG entries were run through Good Jobs First's proprietary parent-subsidary matching system, as we do for all Violation Tracker entries. This system, a combination of machine-generated suggested matches and human verification, identifies which of the entities named in the individual case announcements are owned by any corporations in our universe of more than 3,000 parents. These include large publicly traded and privately held for-profit companies as well as major non-profits. Parent-subsidary linkages are based on current rather than historical relationships.

To qualify for inclusion, a case must have resulted in a requirement that the defendant company pay a monetary penalty of at least \$5,000 – whether in the form of a settlement, a fine, customer restitution, etc. We combine the various types of payments to determine the penalty amount, though the description field will often include a breakdown of the components.

In some cases involving multiple corporations, the state AG announcement may have included only a penalty amount for all the defendants combined. When possible, we used other sources to obtain a breakdown of how much each company may have been required to pay. Otherwise, we assumed each company paid an equal portion.

In about one-third of the multistate cases, the federal government was also involved in the investigation and the negotiation of the settlement. When the announcement provided a breakdown, we included only the state portion in the state AG entries and in the analysis in this report. If no breakdown was available, we used the total penalty amount.²¹

The research for this report was completed on August 31, 2019.

APPENDIX: MULTISTATE AG SETTLEMENTS

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Abbott Laboratories	\$32,500,000	2003	na	*	False Claims Act
Abbott Laboratories	\$22,500,000	2010	24		price-fixing or anti-competitive practices
Abbott Laboratories (Alere Inc.)	\$4,860,779	2018	50	*	False Claims Act
AbbVie	\$339,148,643	2012	50	*	off-label or unapproved promotion of medical products
AbbVie	\$15,350,000	2005	18		price-fixing or anti-competitive practices
AbbVie	\$1,800,000	2018	na	*	kickbacks and bribery
AbbVie (Kos Pharmaceuticals)	\$4,454,432	2010	na	*	kickbacks and bribery
Access Industries (Warner-Elektra-Atlantic)	\$29,400,000	2003	43		price-fixing or anti-competitive practices
Access Resource Services	\$100,000	2002	5		consumer protection violation
Action Integrated Marketing Inc.	\$150,000	2011	10		consumer protection violation
Aditya Birla Group (Columbian Chemicals)	\$390,000	2017	2	*	environmental violation
Adobe Systems	\$1,000,000	2016	15		privacy violation
Adtalem Global Education (DeVry University)	\$88,112	2007	2		consumer protection violation
Aegon (Transamerica Insurance)	\$11,200,000	2013	7		consumer protection violation
Aequitas Capital Management Inc.	\$192,000,000	2017	13		consumer protection violation
Aflac	\$350,000	2017	5		consumer protection violation
Airborne Health, Inc.	\$7,000,000	2008	33		consumer protection violation
Akzo Nobel	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Allergan	\$14,750,000	2010	50	*	off-label or unapproved promotion of medical products
Allergan (Andrx Corporation)	\$40,000,000	2003	51		price-fixing or anti-competitive practices
Allergan (Forest Laboratories)	\$2,500,000	2016	na	*	False Claims Act
Allergan (Forest Pharmaceuticals)	\$60,000,000	2010	na	*	False Claims Act
Allergan (Warner Chilcott)	\$10,600,000	2015	na	*	False Claims Act
Allergan (Warner Chilcott)	\$5,500,000	2007	35		price-fixing or anti-competitive practices
Allergan (Watson Pharmaceuticals)	\$70,000,000	2011	2		False Claims Act
Allianz	\$10,000,000	2012	44		consumer protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Allianz	\$4,700,000	2015	6		consumer protection violation
Ally Financial	\$109,628,425	2012	49	*	mortgage abuses
Alpha Natural Resources	\$13,750,000	2014	3	*	environmental violation
Alphabet Inc. (DoubleClick)	\$450,000	2002	10		privacy violation
Alphabet Inc. (Google)	\$17,000,000	2013	38		privacy violation
Alphabet Inc. (Google)	\$7,000,000	2013	39		privacy violation
Alyon Technologies, Inc. and Telecollect, Inc.	\$39,285,000	2005	24		consumer protection violation
Amazon.com (Zappos.com)	\$106,000	2015	9		privacy violation
American Electric Power	\$4,675,000,000	2007	8	*	environmental violation
American Electric Power	\$8,500,000	2013	8		environmental violation
American Electric Power	\$4,000,000	2019	8		environmental violation
American Express	\$200,000	2000	49		consumer protection violation
American Financial Group (Great American Life)	\$400,000	2016	na		consumer protection violation
American International Group	\$12,500,000	2008	10		price-fixing or anti-competitive practices
American Savings Discount Club	\$3,000,000	2002	3	*	consumer protection violation
AmeriNet Inc.	\$50,000	2005	5		consumer protection violation
Ameriprise Financial	\$1,500,000	2017	23		consumer protection violation
AmerisourceBergen	\$99,875,000	2018	44	*	drug or medical equipment safety violation
AmerisourceBergen (U.S. Bioservices)	\$13,400,000	2017	30	*	kickbacks and bribery
Ameritox Ltd.	\$814,000	2010	3		kickbacks and bribery
Amgen	\$612,000,000	2012	51	*	off-label or unapproved promotion of medical products
Amgen	\$71,000,000	2015	49		off-label or unapproved promotion of medical products
Amgen	\$11,000,000	2013	36		False Claims Act
Anheuser-Busch InBev	\$200,000	2008	11		consumer protection violation
Aon	\$190,000,000	2005	3		price-fixing or anti-competitive practices
Apollo Global Management (Affinion)	\$30,000,000	2013	48		consumer protection violation
Apple Inc.	\$450,000,000	2014	33		price-fixing or anti-competitive practices
Arch Coal	\$2,000,000	2011	2	*	environmental violation
Archer Daniels Midland	\$350,900,000	2003	11	*	environmental violation
Ares Management (Neiman Marcus)	\$1,500,000	2019	45		privacy violation
AscendOne Corporation	\$4,500,000	2010	20		consumer protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Assurity Financial Services, LLC	\$200,000	2009	2		consumer protection violation
Astellas Pharma	\$3,100,000	2014	na	*	False Claims Act
Astellas Pharma (OSI Pharmaceuticals)	\$2,200,000	2016	na	*	False Claims Act
AstraZeneca	\$218,092,993	2010	na	*	off-label or unapproved promotion of medical products
AstraZeneca	\$68,500,000	2011	38		off-label or unapproved promotion of medical products
AstraZeneca	\$46,500,000	2015	50	*	False Claims Act
AstraZeneca	\$24,900,000	2003	51	*	False Claims Act
AstraZeneca	\$2,600,000	2009	na	*	False Claims Act
AT&T	\$500,000	2002	24		consumer protection violation
AT&T (AT&T Mobility)	\$20,000,000	2014	51	*	telecommunications violation
AT&T (Cingular Wireless)	\$1,666,666	2004	32		consumer protection violation
AT&T (DirecTV)	\$13,250,000	2010	50		consumer protection violation
AT&T (DirecTV)	\$5,000,000	2005	22		consumer protection violation
AU Optronics	\$170,000,000	2012	25		price-fixing or anti-competitive practices
Aventis Animal Nutrition	\$20,721,300	2000	44		price-fixing or anti-competitive practices
Aviva	\$4,000,000	2013	6		consumer protection violation
AXA	\$3,280,000	2015	na		consumer protection violation
Bank of America	\$4,550,000,000	2008	na		investor protection violation
Bank of America	\$2,430,000,000	2012	2		investor protection violation
Bank of America	\$2,382,415,075	2012	49	*	mortgage abuses
Bank of America	\$943,000,000	2014	6	*	mortgage abuses
Bank of America	\$500,000,000	2013	2		investor protection violation
Bank of America	\$67,000,000	2010	20	*	price-fixing or anti-competitive practices
Bank of America (Countrywide)	\$8,680,000,000	2008	11		mortgage abuses
Bank of America (Countrywide)	\$3,004,100,000	2010	44		mortgage abuses
Bank of America (Merrill Lynch)	\$3,458,333,333	2008	na		investor protection violation
Bank of America (Merrill Lynch)	\$100,000,000	2002	na	*	investor protection violation
Bank of New York Mellon	\$1,300,000	2011	3		securities issuance or trading violation
Barclays	\$100,000,000	2016	44		interest rate benchmark manipulation
BASF	\$62,258,250	2000	44		price-fixing or anti-competitive practices

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Bausch Health (Bausch & Lomb)	\$17,500,000	2001	32		price-fixing or anti-competitive practices
Bausch Health (ISTA Pharmaceuticals)	\$390,253	2013	50	*	off-label or unapproved promotion of medical products
Bausch Health (Medicis Pharmaceutical)	\$4,000,000	2007	49	*	off-label or unapproved promotion of medical products
Bausch Health (Salix Pharmaceuticals)	\$7,470,000	2016	na	*	kickbacks and bribery
Bausch Health (Valeant Pharmaceuticals)	\$145,000,000	2017	2		investor protection violation
Baxter International (Gambro Healthcare)	\$37,500,000	2005	40		False Claims Act
Bayer	\$108,000,000	2003	50	*	False Claims Act
Bayer	\$20,000,000	2009	27		drug or medical equipment safety violation
Bayer	\$8,000,000	2007	30		drug or medical equipment safety violation
Bayer	\$6,200,000	2001	45	*	False Claims Act
Bayer	\$3,300,000	2010	3		drug or medical equipment safety violation
Bayer	\$60,000	2000	2		consumer protection violation
BB&T	\$6,000,000	2006	11		consumer protection violation
Beazer Homes USA	\$925,000	2010	7	*	environmental violation
Becton Dickinson (CareFusion)	\$40,100,000	2014	51	*	off-label or unapproved promotion of medical products
Benevis LLC and 133 Kool Smiles Clinics	\$23,900,000	2018	21	*	False Claims Act
Berkeley Premium Nutraceuticals, Inc. et al.	\$2,500,000	2006	13		consumer protection violation
Bertelsmann (Penguin Group)	\$90,000,000	2014	33		price-fixing or anti-competitive practices
Best Buy (Musicland Stores)	\$2,000,000	2003	43		price-fixing or anti-competitive practices
Bioproducts Incorporated	\$2,275,454	2009	23		price-fixing or anti-competitive practices
BioScrip	\$5,000,000	2012	41		False Claims Act
BioScrip	\$3,310,000	2014	na	*	kickbacks and bribery
Boehringer Ingelheim	\$95,000,000	2012	51	*	off-label or unapproved promotion of medical products
Boehringer Ingelheim	\$13,500,000	2017	na		off-label or unapproved promotion of medical products
Boston Scientific (Guidant)	\$16,750,000	2007	36		drug or medical equipment safety violation
Bouchard Transportation	\$6,000,000	2010	2	*	environmental violation
BP	\$4,900,000,000	2015	5	*	environmental violation
BP	\$10,000,000	2001	2	*	environmental violation
BrandDirect	\$12,900,000	2000	2		consumer protection violation
Bridgestone	\$51,500,000	2001	51		consumer protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Bristol-Myers Squibb	\$187,000,000	2008	30	*	False Claims Act
Bristol-Myers Squibb	\$100,000,000	2003	39		price-fixing or anti-competitive practices
Bristol-Myers Squibb	\$55,000,000	2003	46		price-fixing or anti-competitive practices
Bristol-Myers Squibb	\$19,500,000	2016	44		off-label or unapproved promotion of medical products
Bristol-Myers Squibb	\$1,100,000	2008	51		price-fixing or anti-competitive practices
British American Tobacco (Brown & Williamson)	\$150,000,000	2003	51		tobacco litigation
British American Tobacco (Brown & Williamson)	\$1,460,000	2004	3		tobacco litigation
British American Tobacco (R. J. Reynolds)	\$175,000	2001	2		tobacco litigation
Broadcom (CA Technologies)	\$11,000,000	2013	8		False Claims Act
Brookdale Senior Living (Emeritus)	\$391,600	2016	18	*	False Claims Act
Bunge	\$1,875,000	2006	8	*	environmental violation
Cancer Fund of America Inc.	\$75,800,000	2016	50		consumer protection violation
Cape Canaveral Cruise Line Tour and Travel, Inc.	\$150,000	2001	15		consumer protection violation
CareCore National	\$18,000,000	2017	21	*	False Claims Act
Career Education Corp.	\$498,700,000	2019	49		consumer protection violation
Career Education Corp.	\$21,200	2007	2		consumer protection violation
CareWell Urgent Care Centers	\$2,000,000	2019	2		False Claims Act
Cargill	\$3,500,000	2005	10	*	environmental violation
Caribbean Cruise Line, Inc.	\$500,000	2015	10		privacy violation
CBS (Simon & Schuster)	\$20,641,666	2013	33		price-fixing or anti-competitive practices
Celgene	\$20,700,000	2017	29	*	off-label or unapproved promotion of medical products
CF Industries (Terra Industries)	\$300,000	2011	3	*	environmental violation
Chemtrade Logistics	\$240,000	2009	3	*	environmental violation
Chevron	\$7,500,000	2003	3	*	environmental violation
Chi Mei Corporation (Chimei Innolux)	\$110,273,318	2011	8		price-fixing or anti-competitive practices
Chinook Global Limited	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Chubb Limited	\$17,000,000	2006	3		price-fixing or anti-competitive practices
Chubb Limited (ACE)	\$80,000,000	2006	3		price-fixing or anti-competitive practices
Chubb Limited (ACE)	\$4,500,000	2007	9		price-fixing or anti-competitive practices
Cigna (Accredo Health)	\$14,939,401	2015	40	*	False Claims Act

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Cigna (Express Scripts)	\$9,500,000	2008	29		consumer protection violation
Cigna (Medco Health Solutions)	\$29,100,000	2004	20		consumer protection violation
Cisco Systems	\$6,000,000	2019	19		privacy violation
CIT	\$10,000,000	2005	21		consumer protection violation
Citigroup	\$7,100,000,000	2008	na		investor protection violation
Citigroup	\$413,041,577	2012	49	*	mortgage abuses
Citigroup	\$291,750,000	2014	5	*	toxic securities abuses
Citigroup (Ameriquest Mortgage)	\$325,000,000	2006	49		consumer protection violation
Citigroup (Citibank)	\$100,000,000	2018	42		interest rate benchmark manipulation
Citigroup (Citibank)	\$1,600,000	2002	27		consumer protection violation
Clean Harbors Inc.	\$300,000	2005	2	*	environmental violation
Coca-Cola	\$325,000	2009	28		consumer protection violation
Colfax Capital Corporation and Culver Capital, LLC, also collectively known as Rome Finance	\$92,000,000	2014	13	*	consumer protection violation
College Board	\$675,000	2008	2		consumer protection violation
Community Health Systems	\$31,000,000	2000	6	*	False Claims Act
Community Health Systems (Health Management Associates)	\$706,084	2018	na	*	False Claims Act
Community Support, Inc.	\$200,000	2009	49		consumer protection violation
ConocoPhillips	\$1,500,000	2001	3	*	environmental violation
Contest America and Opportunities Unlimited	\$387,000	2002	9		consumer protection violation
Couche-Tard (Circle K)	\$225,000	2011	40		tobacco litigation
Covenant Hospice Inc.	\$552,255	2015	2	*	False Claims Act
Credit Suisse	\$200,000,000	2002	na	*	investor protection violation
CRH PLC (Ash Grove Cement)	\$2,500,000	2013	8	*	environmental violation
Crown Plaza Resorts d/b/a Imperial Majesty Cruise Lines	\$213,333	2000	16		consumer protection violation
CVC Capital Partners (Anchor Glass)	\$550,000	2018	2	*	environmental violation
CVS Health	\$9,506,384	2011	42	*	False Claims Act
CVS Health	\$4,000,000	2001	21	*	False Claims Act
CVS Health	\$1,100,000	2003	19		consumer protection violation
CVS Health	\$250,000	2006	44		tobacco litigation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
CVS Health (Caremark)	\$41,000,000	2008	30		kickbacks and bribery
CVS Health (Caremark)	\$15,600,000	2008	24	*	False Claims Act
CVS Health (Caremark)	\$1,940,000	2013	5	*	False Claims Act
CVS Health (Omnicare)	\$38,100,000	2009	50	*	False Claims Act
CVS Health (Omnicare)	\$28,125,000	2016	46	*	kickbacks and bribery
CVS Health (Omnicare)	\$23,000,000	2017	45		False Claims Act
CVS Health (Omnicare)	\$21,050,000	2010	2		False Claims Act
CVS Health (Omnicare)	\$19,858,782	2006	43	*	False Claims Act
CVS Health (Omnicare)	\$8,240,000	2014	na	*	False Claims Act
CVS Health (Omnicare)	\$4,190,000	2014	49	*	kickbacks and bribery
Daiichi Sankyo	\$39,000,000	2015	51		False Claims Act
Daiichi Sankyo	\$4,340,100	2000	44		price-fixing or anti-competitive practices
Danone (Dannon Company)	\$21,000,000	2010	39		consumer protection violation
DaVita HealthCare Partners	\$22,356,143	2015	5		kickbacks and bribery
DaVita HealthCare Partners	\$3,200,000	2017	na	*	False Claims Act
Dell Technologies	\$3,350,000	2009	34		consumer protection violation
Deutsche Bank	\$3,348,333,333	2008	na		investor protection violation
Deutsche Bank	\$220,000,000	2017	45		interest rate benchmark manipulation
Deutsche Bank	\$80,000,000	2002	na		investor protection violation
Deutsche Telekom (T-Mobile)	\$18,000,000	2014	50	*	telecommunications violation
DexYP (YP.com)	\$2,000,000	2006	34		consumer protection violation
Directory Billing, LLC dba USDirectory.com	\$400,000	2008	26		consumer protection violation
DISH Network	\$5,900,000	2009	46		consumer protection violation
DISH Network (Blockbuster Inc.)	\$630,000	2005	48		consumer protection violation
Dominion Energy (Virginia Electric)	\$13,900,000	2003	5	*	environmental violation
Duke Energy	\$207,500,000	2004	3		energy market manipulation
Duke Energy	\$1,000,000	2009	3	*	environmental violation
Duke Energy (Cinergy)	\$30,000,000	2000	3	*	environmental violation
DuPont de Nemours	\$4,125,000	2007	3	*	environmental violation
EchoStar	\$5,000,000	2003	13		consumer protection violation
Education Management Corporation	\$31,000,000	2015	40	*	False Claims Act

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Educational Research Center of America, Inc.	\$200,000	2008	36		privacy violation
Eisai	\$7,634,700	2000	44		price-fixing or anti-competitive practices
Eisai	\$4,658,249	2010	51	*	off-label or unapproved promotion of medical products
Eli Lilly	\$361,828,456	2009	38	*	off-label or unapproved promotion of medical products
Eli Lilly	\$62,000,000	2008	32		off-label or unapproved promotion of medical products
Eli Lilly	\$160,000	2002	8		privacy violation
Encore Capital Group	\$6,000,000	2018	42		consumer protection violation
Encore Paper Co.	\$300,000	2000	3		price-fixing or anti-competitive practices
Endo International	\$173,000,000	2014	48	*	off-label or unapproved promotion of medical products
Endo International	\$39,000,000	2015	48	*	False Claims Act
Endo International	\$2,300,000	2019	18		price-fixing or anti-competitive practices
Endo International (Dava Pharmaceuticals)	\$11,000,000	2012	50	*	False Claims Act
Endo International (Par Pharmaceutical)	\$154,000,000	2011	5		False Claims Act
Endo International (Par Pharmaceutical)	\$22,500,000	2013	na	*	off-label or unapproved promotion of medical products
Energy Transfer (Sunoco)	\$6,900,000	2005	3	*	environmental violation
Enron	\$1,520,000,000	2005	3		energy market manipulation
Equifax	\$175,000,000	2019	47		privacy violation
Equifax	\$2,000,000	2015	31		consumer protection violation
Equinox International	\$40,000,000	2000	8	*	consumer protection violation
E-Trade Financial	\$100,000	2012	3		price-fixing or anti-competitive practices
Evonik Industries	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Experian	\$2,000,000	2015	31		consumer protection violation
Extendicare	\$5,700,000	2014	8	*	False Claims Act
Exxon Mobil	\$18,400,000	2005	3	*	environmental violation
Exxon Mobil	\$100,000	2002	44		tobacco litigation
Fax.com	\$30,000,000	2006	2		consumer protection violation
Ferring B.V.	\$1,800,000	2012	33		price-fixing or anti-competitive practices
Fiat Chrysler Automobiles	\$72,500,000	2019	51		environmental violation
Fidelity National Financial (Lender Processing Services)	\$120,000,000	2013	46		mortgage abuses
First Alliance Mortgage Company	\$60,000,000	2002	6		mortgage abuses

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
First Regional Bank	\$60,000	2008	3		tobacco litigation
FirstEnergy (Ohio Edison)	\$18,900,000	2005	3	*	environmental violation
FirstGroup	\$1,100,000	2007	11		price-fixing or anti-competitive practices
Florida Travel Network	\$213,333	2000	16		consumer protection violation
Florists' Transworld Delivery Inc. and FTD.com Inc.	\$2,822,400	2015	22		consumer protection violation
Follett (Baker & Taylor)	\$15,500,000	2000	18	*	False Claims Act
FORBA Holdings LLC	\$9,714,355	2010	23	*	False Claims Act
Ford Motor	\$51,500,000	2002	51		motor vehicle safety violation
Ford Motor	\$6,200,000	2004	38		consumer protection violation
Fortune Hi-Tech Marketing Inc.	\$7,750,000	2014	3	*	consumer protection violation
Foxconn Technology Group (Sharp Corporation)	\$115,500,000	2011	8		price-fixing or anti-competitive practices
Freedom Furniture, Inc. et al.	\$2,600,000	2014	2	*	consumer protection violation
FreeScore360.com, FreeScoreOnline.com and ScoreSense.com	\$22,000,000	2014	2	*	consumer protection violation
Fresenius	\$7,600,000	2000	na	*	False Claims Act
Friedman's Inc. dba Friedman's Jewelers	\$2,150,000	2006	18		consumer protection violation
Gateway Distributors and The Right Solution Gateway	\$100,000	2006	19		consumer protection violation
General Electric	\$2,890,000	2005	8		consumer protection violation
General Electric (GE Funding)	\$34,250,000	2011	25	*	price-fixing or anti-competitive practices
General Motors	\$120,000,000	2017	50		motor vehicle safety violation
General Motors	\$2,845,000	2011	12		environmental violation
Genworth Financial	\$1,900,000	2014	10		consumer protection violation
GlaxoSmithKline	\$477,792,391	2012	45	*	off-label or unapproved promotion of medical products
GlaxoSmithKline	\$105,000,000	2014	45		kickbacks and bribery
GlaxoSmithKline	\$90,000,000	2012	38		drug or medical equipment safety violation
GlaxoSmithKline	\$70,000,000	2006	5		False Claims Act
GlaxoSmithKline	\$40,750,000	2011	38		drug or medical equipment safety violation
GlaxoSmithKline	\$40,000,000	2003	50		False Claims Act
GlaxoSmithKline	\$14,000,000	2006	47		price-fixing or anti-competitive practices
GlaxoSmithKline	\$10,000,000	2005	50	*	False Claims Act

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
GlaxoSmithKline	\$3,500,000	2006	48		price-fixing or anti-competitive practices
GlaxoSmithKline (SB Pharmco Puerto Rico)	\$163,560,000	2010	38	*	drug or medical equipment safety violation
GlaxoSmithKline (SmithKline Beecham)	\$10,000,000	2005	51		price-fixing or anti-competitive practices
Goldman Sachs	\$3,355,833,333	2008	na		investor protection violation
Goldman Sachs	\$225,000,000	2016	3	*	toxic securities abuses
Goldman Sachs	\$110,000,000	2002	na	*	investor protection violation
Guardian Life Insurance	\$2,000,000	2015	na		consumer protection violation
Gunning & Associates Marketing Inc. and Fleet Liquidators of America, Inc.	\$300,000	2006	10		consumer protection violation
H&R Block	\$3,300,000	2003	42		consumer protection violation
H.I.G. Capital (Classmates Inc.)	\$8,177,600	2015	22		consumer protection violation
Hachette Book Group Inc.	\$34,791,666	2013	33		price-fixing or anti-competitive practices
HannStar Display	\$25,650,000	2011	8		price-fixing or anti-competitive practices
Hartford Financial Services	\$115,000,000	2007	3		price-fixing or anti-competitive practices
Hartford Financial Services	\$20,000,000	2006	2		investor protection violation
Hartford Financial Services	\$2,100,000	2016	na		consumer protection violation
HCA Healthcare	\$17,500,000	2003	na		False Claims Act
HCA Healthcare	\$13,600,000	2000	na	*	False Claims Act
HCI Direct, Inc.	\$455,000	2008	16		consumer protection violation
Health Direct, Inc., Lipo-Slim, Inc. and Tactica International, Inc.	\$100,000	2000	10		consumer protection violation
Healthcare Research and Development Institute, LLC	\$150,000	2007	2		price-fixing or anti-competitive practices
Healthpoint Ltd.	\$28,000,000	2013	16	*	off-label or unapproved promotion of medical products
Hearst	\$925,000	2005	na		consumer protection violation
Hearts 2 Heroes Inc.	\$286,959	2019	na		consumer protection violation
HeidelbergCement (Essroc Cement)	\$1,700,000	2011	3	*	environmental violation
Help the Vets, Inc.	\$1,800,000	2019	5		consumer protection violation
Herman Miller Inc.	\$750,000	2008	3		price-fixing or anti-competitive practices
Hilton Worldwide	\$700,000	2017	2		privacy violation
Hitachi	\$38,977,224	2011	8		price-fixing or anti-competitive practices
HollyFrontier (Frontier Refining)	\$1,380,000	2009	2	*	environmental violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
HollyFrontier (Navajo Refining)	\$750,000	2001	2	*	environmental violation
Holtzbrinck Publishers LLC dba MacMillan	\$26,250,000	2014	33		price-fixing or anti-competitive practices
House of Prince A/S	\$55,400,000	2006	47		tobacco litigation
Hovnanian Enterprises	\$1,000,000	2010	4	*	environmental violation
HSBC	\$59,500,000	2016	49	*	mortgage abuses
HSBC (Household Finance)	\$484,000,000	2002	20		mortgage abuses
Hyundai Motor	\$41,223,320	2016	35		environmental violation
IFC Credit Corporation	\$6,000,000	2008	21		consumer protection violation
Infineon Technologies	\$29,113,776	2010	33		price-fixing or anti-competitive practices
Invesco	\$325,000,000	2004	2	*	securities issuance or trading violation
Invesco (AIM Advisors)	\$125,000,000	2004	3	*	securities issuance or trading violation
Janus Henderson	\$225,000,000	2004	2		securities issuance or trading violation
JK Harris and Company LLC and Financial Recovery System LLC	\$1,500,000	2008	18		consumer protection violation
Johnson & Johnson	\$541,000,000	2013	5	*	off-label or unapproved promotion of medical products
Johnson & Johnson	\$120,000,000	2019	46		drug or medical equipment safety violation
Johnson & Johnson	\$60,000,000	2001	32		price-fixing or anti-competitive practices
Johnson & Johnson	\$33,000,000	2017	43		drug or medical equipment safety violation
Johnson & Johnson (Janssen Pharmaceuticals)	\$181,000,000	2012	38		off-label or unapproved promotion of medical products
Johnson & Johnson (LifeScan)	\$30,600,000	2003	47		drug or medical equipment safety violation
Johnson & Johnson (Ortho-McNeil)	\$24,681,516	2010	51	*	off-label or unapproved promotion of medical products
Johnson & Johnson (Ortho-McNeil)	\$3,400,000	2009	na	*	False Claims Act
JPMorgan Chase	\$3,525,000,000	2008	na		investor protection violation
JPMorgan Chase	\$1,121,188,661	2012	49	*	mortgage abuses
JPMorgan Chase	\$1,066,000,000	2013	5	*	toxic securities abuses
JPMorgan Chase	\$150,000,000	2015	3		investor protection violation
JPMorgan Chase	\$80,000,000	2002	na	*	investor protection violation
JPMorgan Chase	\$75,000,000	2011	20	*	price-fixing or anti-competitive practices
JPMorgan Chase (Bear Stearns)	\$80,000,000	2002	na	*	investor protection violation
JPMorgan Chase (Chase Bank)	\$106,000,000	2015	48	*	consumer protection violation
JPMorgan Chase (Chase Bank)	\$3,850,000	2006	16		consumer protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
JPMorgan Chase (First USA)	\$1,300,000	2002	28		consumer protection violation
KB Home	\$1,185,000	2008	7	*	environmental violation
Kimberly-Clark	\$300,000	2000	3		price-fixing or anti-competitive practices
Kinder Morgan (El Paso Corporation)	\$1,450,000,000	2003	4		energy market manipulation
KKR & Co. (PharMerica)	\$2,500,000	2015	44	*	kickbacks and bribery
Koch Industries (Fort James Corp.)	\$300,000	2000	3		price-fixing or anti-competitive practices
Koch Industries (Guardian Industries)	\$312,000	2015	2	*	environmental violation
Koch Industries (Invista)	\$1,700,000	2009	2	*	environmental violation
Kroger	\$325,000	2007	42		tobacco litigation
KV Pharmaceutical	\$17,000,000	2012	50	*	False Claims Act
LafargeHolcim	\$1,690,000	2010	12	*	environmental violation
LafargeHolcim	\$740,000	2011	2	*	environmental violation
Leasecomm	\$24,000,000	2003	8	*	consumer protection violation
Lehman Brothers	\$80,000,000	2002	na	*	investor protection violation
Lennar (Ryland)	\$625,000	2011	7	*	environmental violation
Lenovo	\$3,500,000	2017	32		consumer protection violation
Level Propane Gases Inc.	\$700,000	2001	8		consumer protection violation
LG	\$380,000,000	2012	8		price-fixing or anti-competitive practices
Lincoln National	\$12,600,000	2013	8		consumer protection violation
Linked Service Solutions, LLC	\$25,000	2015	10		privacy violation
Lonza	\$2,275,454	2009	23		price-fixing or anti-competitive practices
LPL Financial LLC	\$25,848,000	2019	na		investor protection violation
LPL Financial LLC	\$2,000,000	2015	2		consumer protection violation
LSB Industries	\$362,500	2014	2	*	environmental violation
Lyon Financial Services d/b/a U.S. Bancorp Business Equipment Finance Group	\$10,000,000	2005	21		consumer protection violation
LyondellBasell Industries (Equistar Chemicals)	\$2,500,000	2007	3	*	environmental violation
M.D.C. Holdings (Richmond American Homes)	\$795,000	2008	7	*	environmental violation
Mahard Egg Farm	\$1,900,000	2011	2	*	environmental violation
Mallinckrodt	\$100,000,000	2017	5	*	price-fixing or anti-competitive practices
Mallinckrodt	\$3,500,000	2013	8	*	False Claims Act

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Manulife Financial (John Hancock)	\$3,000,000	2011	35		consumer protection violation
Marathon Petroleum (Marathon Ashland)	\$100,000	2001	2	*	environmental violation
Marathon Petroleum (Tesoro)	\$2,400,000	2016	2	*	environmental violation
Marcal Paper Mills Co.	\$300,000	2000	3		price-fixing or anti-competitive practices
Marsh & McLennan	\$400,000,000	2009	2		investor protection violation
Marsh & McLennan	\$7,000,000	2009	9		price-fixing or anti-competitive practices
Mattel	\$12,000,000	2008	38		environmental violation
Maxim Healthcare Services	\$121,514,199	2011	41	*	False Claims Act
McKesson	\$151,000,000	2012	29		False Claims Act
McWane	\$424,803	2010	2	*	environmental violation
Medical Informatics Engineering, Inc.	\$900,000	2019	16		privacy violation
Medtronic	\$12,000,000	2017	5		drug or medical equipment safety violation
Medtronic	\$5,800,000	2006	na	*	drug or medical equipment safety violation
Medtronic	\$362,362	2014	4	*	kickbacks and bribery
Medtronic	\$327,000	2014	35		kickbacks and bribery
Meiji Yasuda Life Insurance (Standard Insurance)	\$277,000	2016	5		consumer protection violation
Merck	\$290,000,000	2008	50	*	False Claims Act
Merck	\$201,975,000	2012	50	*	off-label or unapproved promotion of medical products
Merck	\$58,000,000	2008	30		consumer protection violation
Merck	\$5,400,000	2009	36		consumer protection violation
Merck (Inspire Pharmaceuticals)	\$6,000,000	2015	48	*	off-label or unapproved promotion of medical products
Merck (Organon)	\$36,000,000	2004	50		price-fixing or anti-competitive practices
Merck (Organon)	\$31,000,000	2014	50		off-label or unapproved promotion of medical products
Merck (Schering-Plough)	\$292,969,482	2004	50	*	kickbacks and bribery
Merck (Schering-Plough)	\$91,602,000	2006	51	*	off-label or unapproved promotion of medical products
Merck KGaA (EMD Serono)	\$44,300,000	2011	51	*	False Claims Act
Merck KGaA (EMD)	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Merck KGaA (Serono)	\$262,000,000	2005	43	*	off-label or unapproved promotion of medical products
Meredith (Time Inc.)	\$8,800,000	2006	23		consumer protection violation
Meredith (Time Inc.)	\$4,900,000	2000	49		consumer protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
MetLife	\$40,000,000	2012	34		consumer protection violation
Michelin	\$375,000	2009	17		consumer protection violation
Micron Technology	\$66,774,984	2010	33		price-fixing or anti-competitive practices
Micron Technology (Elpida Memory)	\$4,259,948	2010	33		price-fixing or anti-competitive practices
Millennium Health	\$38,600,000	2015	48	*	False Claims Act
Mitsubishi Group	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Mitsui (MOEX Offshore)	\$25,000,000	2012	5	*	environmental violation
Molson Coors Brewing (MillerCoors)	\$550,000	2008	13		consumer protection violation
MoneyGram International	\$13,000,000	2016	50		consumer protection violation
MoneyGram International	\$1,100,000	2008	45		consumer protection violation
Moody's	\$426,500,000	2017	21		toxic securities abuses
Morgan Stanley	\$3,535,000,000	2008	na		investor protection violation
Morgan Stanley	\$400,000,000	2002	na	*	investor protection violation
Morgan Stanley (Salomon Smith Barney)	\$125,000,000	2002	na	*	investor protection violation
Mosaic	\$3,000,000	2015	2	*	environmental violation
Mosel-Vitellic Corp.	\$2,778,900	2010	33		price-fixing or anti-competitive practices
Murphy USA	\$624,999	2010	2	*	environmental violation
MV Transportation	\$150,402	2016	3		False Claims Act
Mylan	\$465,000,000	2017	50	*	False Claims Act
Mylan	\$118,000,000	2009	na	*	False Claims Act
Mylan	\$108,000,000	2000	51	*	price-fixing or anti-competitive practices
Natera Inc.	\$756,183	2018	na	*	False Claims Act
National Football League	\$100,000	2016	5		price-fixing or anti-competitive practices
National Research Center for College and University Admissions	\$300,000	2005	42		consumer protection violation
National Senior Care Inc. (Mariner Health Care)	\$6,160,000	2011	na	*	False Claims Act
National Travel Services, Inc. and Plaza Resorts, Inc.	\$213,333	2000	16		consumer protection violation
Nationwide	\$7,200,000	2012	7		consumer protection violation
Nationwide	\$5,500,000	2017	33		privacy violation
Natixis	\$29,950,000	2016	22		price-fixing or anti-competitive practices

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
NCO Financial Systems, Inc.	\$950,000	2012	19		consumer protection violation
NEC Corp.	\$20,277,350	2010	33		price-fixing or anti-competitive practices
Nepera, Inc.	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Nestle	\$325,000	2009	20		consumer protection violation
New Access, LLC	\$2,000,000	2004	10		consumer protection violation
New Times Media	\$375,000	2003	2		price-fixing or anti-competitive practices
New York Life Insurance	\$15,000,000	2013	7		consumer protection violation
Newport Creative Communications	\$400,000	2006	19		consumer protection violation
News Corp. (HarperCollins)	\$22,471,666	2013	33		price-fixing or anti-competitive practices
NextEra Energy (New Hampshire Transmission)	\$6,800,000	2016	4		consumer protection violation
Ningbo Joyson Electronic (TK Holdings-Takta)	\$650,000,000	2018	45		consumer protection violation
Novartis	\$88,258,694	2010	na	*	off-label or unapproved promotion of medical products
Novartis	\$83,129,754	2015	41	*	kickbacks and bribery
Novartis	\$29,000,000	2010	51	*	off-label or unapproved promotion of medical products
Novartis (CIBA Vision)	\$5,000,000	2000	32		price-fixing or anti-competitive practices
Novartis (Geneva Pharmaceuticals)	\$15,350,000	2005	18		price-fixing or anti-competitive practices
Novelion Therapeutics (Aegerion Pharmaceuticals)	\$2,700,000	2017	na	*	False Claims Act
Novo Holdings A/S (Novo Nordisk)	\$3,574,209	2011	na	*	off-label or unapproved promotion of medical products
Novo Holdings A/S (Novo Nordisk)	\$3,320,963	2017	na	*	False Claims Act
NRG Energy (GenOn Power)	\$1,000,000	2013	2		environmental violation
NRG Energy (Reliant Energy)	\$460,000,000	2005	3		energy market manipulation
Nucor	\$13,000,000	2001	7	*	environmental violation
NuVasive Inc.	\$916,586	2015	7	*	False Claims Act
Oaktree Capital Management (Aleris International)	\$4,600,000	2009	10	*	environmental violation
Ocwen Financial	\$127,300,000	2013	49	*	mortgage abuses
Ocwen Financial (PHH Mortgage)	\$45,000,000	2018	50		mortgage abuses
Olympus	\$306,000,000	2016	na	*	False Claims Act
Oppenheimer Holdings	\$31,000,000	2010	na		investor protection violation
Otsuka Pharmaceutical	\$1,700,000	2008	na	*	off-label or unapproved promotion of medical products
Oxyfresh Worldwide Inc.	\$65,000	2000	12		consumer protection violation
Pacific Life	\$2,450,000	2015	na		consumer protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Para-Plus Translations Inc.	\$500,000	2017	2	*	False Claims Act
Payday Loan Debt Solution, Inc.	\$100,000	2012	5	*	consumer protection violation
PayPal Holdings	\$1,700,000	2006	28		consumer protection violation
PCC Direct Inc.	\$100,000	2001	15		consumer protection violation
PDVSA (Petroleos de Venezuela S.A.)	\$8,600,000	2004	3	*	environmental violation
Pediatric Services of America, Inc.	\$2,700,000	2015	20	*	False Claims Act
Pediatric Medical Group	\$25,078,918	2016	4	*	False Claims Act
Perrigo	\$750,000	2004	na		price-fixing or anti-competitive practices
Perrigo (Elan Corp.)	\$43,399,040	2010	51	*	off-label or unapproved promotion of medical products
Pershing Square Capital Management	\$145,000,000	2017	2		investor protection violation
Pfizer	\$331,485,170	2009	50	*	kickbacks and bribery
Pfizer	\$60,000,000	2008	34		off-label or unapproved promotion of medical products
Pfizer	\$42,900,000	2012	34		off-label or unapproved promotion of medical products
Pfizer	\$35,000,000	2014	42		off-label or unapproved promotion of medical products
Pfizer	\$21,084,700	2002	40	*	False Claims Act
Pfizer	\$6,000,000	2003	19		drug or medical equipment safety violation
Pfizer	\$2,621,154	2011	50	*	False Claims Act
Pfizer (Alpharma)	\$8,900,000	2010	51	*	False Claims Act
Pfizer (Alpharma)	\$750,000	2004	51		price-fixing or anti-competitive practices
Pfizer (King Pharmaceuticals)	\$124,000,000	2006	49	*	False Claims Act
Pfizer (Warner-Lambert)	\$190,000,000	2004	50	*	off-label or unapproved promotion of medical products
Pfizer (Wyeth Pharmaceuticals)	\$371,351,180	2016	na	*	False Claims Act
Pfizer (Wyeth Pharmaceuticals)	\$257,400,000	2013	51	*	off-label or unapproved promotion of medical products
Phillips 66 (ConocoPhillips, prior to split-up)	\$14,500,000	2005	4	*	environmental violation
Phillips 66 (ConocoPhillips, prior to split-up)	\$125,000	2005	40		tobacco litigation
Phusion Projects, LLC	\$400,000	2014	20		consumer protection violation
PNC Financial Services (National City)	\$7,200,000	2008	22		consumer protection violation
PointRoll, Inc.	\$750,000	2014	6		privacy violation
Popular Leasing U.S.A., Inc.	\$35,000,000	2006	21		consumer protection violation
Premera Blue Cross	\$10,000,000	2019	30		privacy violation
Premier Brands Group Holdings (Nine West)	\$34,000,000	2000	46	*	price-fixing or anti-competitive practices

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Prudential (UK) (Jackson National Life)	\$2,500,000	2015	5		consumer protection violation
Prudential Financial	\$270,000,000	2006	3	*	securities issuance or trading violation
Prudential Financial	\$17,000,000	2012	20		consumer protection violation
Publishers Clearing House	\$34,000,000	2001	26		consumer protection violation
Publishers Clearing House	\$18,000,000	2000	24		consumer protection violation
Publishers Clearing House	\$3,500,000	2010	32		consumer protection violation
PulteGroup	\$1,485,000	2008	7	*	environmental violation
PulteGroup (Centex Homes)	\$877,000	2008	7	*	environmental violation
Purdue Pharma	\$19,500,000	2007	27		off-label or unapproved promotion of medical products
Purdue Pharma (Purdue Frederick)	\$160,000,000	2007	26	*	False Claims Act
Quest Diagnostics	\$12,400,000	2009	51		False Claims Act
QuinStreet Inc.	\$2,500,000	2012	20		consumer protection violation
Rabobank (De Lage Landen)	\$872,000	2005	14		consumer protection violation
Reader's Digest Association	\$8,000,000	2001	33		consumer protection violation
Reckitt Benckiser	\$200,000,000	2019	na	*	Controlled Substances Act violation
RELX Group (ChoicePoint)	\$500,000	2007	44		privacy violation
RELX Group (LexisNexis Risk Solutions)	\$5,800,000	2019	5		False Claims Act
Rite Aid	\$1,400,000	2004	29	*	False Claims Act
Rite Aid	\$250,000	2004	20		tobacco litigation
Rite Aid (Eckerd)	\$3,133,248	2002	18		False Claims Act
Robert Bosch	\$98,700,000	2019	51		environmental violation
Roche (Genentech)	\$19,000,000	2000	50		off-label or unapproved promotion of medical products
Roche (Genentech)	\$2,200,000	2016	na	*	False Claims Act
Roche (Hoffman-LaRoche)	\$142,494,000	2000	44		price-fixing or anti-competitive practices
Roche (InterMune)	\$6,700,000	2006	na	*	off-label or unapproved promotion of medical products
Rollins Inc. (Orkin Exterminating)	\$150,000	2001	6		consumer protection violation
Royal Bank of Canada (RBC Capital Markets)	\$859,800,000	2008	na		investor protection violation
Royal Dutch Shell (Equilon Enterprises)	\$7,500,000	2001	2	*	environmental violation
Royal Dutch Shell (Shell Chemical)	\$806,630	2010	2	*	environmental violation
Royal Dutch Shell (Shell Oil)	\$100,000	2008	47		tobacco litigation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Royal Philips (Respironics)	\$660,000	2016	29	*	False Claims Act
Ruby Corp. and AshleyMadison.com	\$17,500,000	2016	13		privacy violation
S&P Global (Standard & Poor's)	\$687,500,000	2015	20	*	toxic securities abuses
S&P Global (Standard & Poor's)	\$19,000,000	2015	2		investor protection violation
Saint-Gobain	\$1,100,000	2010	10	*	environmental violation
Samsung	\$240,000,000	2011	8		price-fixing or anti-competitive practices
Samsung	\$90,000,000	2007	39		price-fixing or anti-competitive practices
Sanofi	\$617,000	2013	na		kickbacks and bribery
Sanofi (Aventis)	\$40,000,000	2009	51	*	False Claims Act
Sanofi (Aventis)	\$40,000,000	2003	51		price-fixing or anti-competitive practices
Sanofi (Aventis)	\$10,645,600	2007	na	*	False Claims Act
Sanofi (Aventis)	\$1,650,000	2012	33		price-fixing or anti-competitive practices
Sanofi (Genzyme)	\$22,280,000	2013	na	*	False Claims Act
Saudi Arabian Oil Company (Motiva)	\$7,500,000	2001	2	*	environmental violation
Sears (Kmart)	\$2,550,000	2013	30		False Claims Act
Securian	\$625,000	2016	na		consumer protection violation
Seiko Group (Epson)	\$2,850,000	2011	8		price-fixing or anti-competitive practices
Seven & I Holdings (7-Eleven)	\$375,000	2005	41		tobacco litigation
Sinclair Oil	\$2,450,000	2008	2	*	environmental violation
Sirius XM Holdings	\$3,800,000	2014	45		consumer protection violation
SK Holdings (Hynix Semiconductor)	\$49,971,842	2010	33		price-fixing or anti-competitive practices
Skechers USA Inc.	\$5,000,000	2012	45		consumer protection violation
Societe Generale	\$26,750,000	2016	22		price-fixing or anti-competitive practices
SoftBank (Sprint)	\$22,000,000	2010	36		consumer protection violation
SoftBank (Sprint)	\$12,000,000	2015	51	*	telecommunications violation
SoftBank (Sprint)	\$1,666,666	2004	32		consumer protection violation
SoftBank (Sprint)	\$500,000	2002	24		consumer protection violation
Solvay (Rhodia)	\$2,000,000	2007	2	*	environmental violation
Sony	\$27,225,000	2003	43		price-fixing or anti-competitive practices
Sony	\$4,250,000	2006	40		consumer protection violation
Sony (Bertelsmann Music)	\$27,775,000	2003	43		price-fixing or anti-competitive practices

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Sony (EMI Music)	\$15,000,000	2003	43		price-fixing or anti-competitive practices
Spectrum Brands Holdings (Salton)	\$8,200,000	2002	45		price-fixing or anti-competitive practices
State Farm Insurance	\$41,000,000	2005	49		consumer protection violation
State Farm Insurance	\$250,000	2017	na		consumer protection violation
Stericycle	\$26,750,000	2015	13		False Claims Act
Stericycle	\$50,000	2003	2		price-fixing or anti-competitive practices
Stryker (OtisMed)	\$376,700	2014	na	*	False Claims Act
Student CU Connect CUSO, LLC	\$168,000,000	2019	45	*	consumer protection violation
Student Loan Xpress, Inc.	\$112,825,000	2009	12		consumer protection violation
Sumitomo Group	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Sumitomo Group (Symetra Life)	\$1,200,000	2014	7		consumer protection violation
Sun Life Financial	\$3,200,000	2014	8		consumer protection violation
Sun Pharmaceuticals (Ranbaxy)	\$266,729,715	2013	51	*	drug or medical equipment safety violation
SunCoke Energy	\$725,000	2013	2	*	environmental violation
SunTrust Banks	\$40,000,000	2014	50	*	mortgage abuses
Symantec (LifeLock)	\$1,000,000	2010	35	*	consumer protection violation
Takeda Pharmaceutical	\$17,551,650	2000	44		price-fixing or anti-competitive practices
Takeda Pharmaceutical (Shire Pharmaceuticals)	\$20,786,034	2014	na	*	off-label or unapproved promotion of medical products
Takeda Pharmaceutical (Shire Pharmaceuticals)	\$6,104,000	2017	38	*	False Claims Act
Takeda Pharmaceutical (TAP Pharmaceutical)	\$25,516,440	2001	51	*	False Claims Act
Target	\$18,500,000	2017	48		privacy violation
Tatung (Chunghwa Picture Tubes)	\$5,305,105	2011	8		price-fixing or anti-competitive practices
TD Ameritrade	\$456,000,000	2009	na		investor protection violation
TechnoBrands, Inc.	\$105,000	2001	15		consumer protection violation
Tenet Healthcare	\$123,772,464	2016	2	*	kickbacks and bribery
Tenet Healthcare	\$820,000	2002	22	*	False Claims Act
Tennessee Valley Authority	\$11,700,000	2011	4		environmental violation
Teva Pharmaceutical Industries	\$169,000,000	2010	3		False Claims Act
Teva Pharmaceutical Industries (Barr Pharmaceuticals)	\$5,900,000	2008	35		price-fixing or anti-competitive practices

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
Teva Pharmaceutical Industries (Cephalon)	\$125,000,000	2016	49		consumer protection violation
Teva Pharmaceutical Industries (Cephalon)	\$116,000,000	2008	14	*	off-label or unapproved promotion of medical products
Teva Pharmaceutical Industries (Cephalon)	\$7,500,000	2015	51	*	False Claims Act
Teva Pharmaceutical Industries (IVAX Pharmaceuticals)	\$5,400,000	2009	na	*	False Claims Act
The Tax Club, Inc.	\$15,600,000	2014	2		consumer protection violation
TJX	\$9,750,000	2009	41		privacy violation
Toll Brothers	\$741,000	2012	2	*	environmental violation
Toronto-Dominion Bank (TD Bank)	\$850,000	2014	9		privacy violation
Toshiba	\$21,000,000	2012	8		price-fixing or anti-competitive practices
Tower Records	\$275,000	2003	43		price-fixing or anti-competitive practices
Toyota	\$29,000,000	2013	29		motor vehicle safety violation
TradeKing	\$200,000	2012	3		price-fixing or anti-competitive practices
Trans World Entertainment Corp.	\$800,000	2003	43		price-fixing or anti-competitive practices
TransUnion	\$2,000,000	2015	31		consumer protection violation
Travelers	\$6,000,000	2007	10		price-fixing or anti-competitive practices
Travelers (St. Paul Travelers)	\$77,000,000	2006	3		price-fixing or anti-competitive practices
Triad Discount Buying Service, Inc.	\$9,000,000	2001	40	*	consumer protection violation
Trilegiant Corp.	\$10,650,000	2006	16		consumer protection violation
U.S. Bancorp (US Bank)	\$2,000,000	2000	30		privacy violation
Uber Technologies	\$148,000,000	2018	51		consumer protection violation
UBS	\$11,150,000,000	2008	na		investor protection violation
UBS	\$90,800,000	2011	25	*	price-fixing or anti-competitive practices
UBS	\$80,000,000	2002	na	*	investor protection violation
UBS	\$68,000,000	2018	40		interest rate benchmark manipulation
UBS	\$4,580,000	2013	51		investor protection violation
UCB	\$9,893,322	2011	11	*	off-label or unapproved promotion of medical products
UCB	\$2,275,454	2009	23		price-fixing or anti-competitive practices
UCB (Schwarz Pharma)	\$9,756,164	2010	51	*	False Claims Act
United Egg Producers	\$100,000	2006	17		consumer protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
United Parcel Service	\$4,000,000	2015	14		False Claims Act
United States Sales Corporation	\$35,300,000	2000	49		consumer protection violation
US Fidelis	\$13,000,000	2012	12		consumer protection violation
US Foreclosure Relief Corp.	\$1,000,000	2010	2		consumer protection violation
US Express Leasing, Inc.	\$1,590,000	2005	12		consumer protection violation
USA Discounters	\$95,900,000	2016	50		consumer protection violation
Valero Energy	\$11,000,000	2005	5	*	environmental violation
Valero Energy	\$100,000	2010	39		tobacco litigation
Verizon Communications	\$16,000,000	2015	51	*	telecommunications violation
Verizon Communications	\$1,666,666	2004	32		consumer protection violation
Verizon Communications (America Online)	\$3,000,000	2007	49		consumer protection violation
Verizon Communications (MCI)	\$315,000,000	2005	16		tax violations
Verizon Communications (MCI)	\$500,000	2002	24		consumer protection violation
Victory Pharma	\$12,200,000	2013	45		kickbacks and bribery
Village Voice Media	\$375,000	2003	2		price-fixing or anti-competitive practices
Vivendi (Universal Music)	\$40,600,000	2003	43		price-fixing or anti-competitive practices
Volkswagen	\$570,000,000	2016	43	*	environmental violation
Volkswagen	\$157,000,000	2017	10		environmental violation
Vonage Holdings	\$3,000,000	2009	32		consumer protection violation
Vonage Holdings	\$500,000	2006	6		consumer protection violation
Voya Financial (ING)	\$33,000,000	2006	2		investor protection violation
Voya Financial (ING)	\$10,700,000	2013	7		consumer protection violation
Walgreens Boots Alliance	\$69,200,000	2019	39	*	False Claims Act
Walgreens Boots Alliance	\$16,400,000	2008	46	*	False Claims Act
Walgreens Boots Alliance	\$9,900,000	2008	4	*	False Claims Act
Walgreens Boots Alliance	\$3,790,000	2017	31	*	False Claims Act
Walgreens Boots Alliance	\$600,000	2012	na	*	False Claims Act
Walgreens Boots Alliance	\$320,000	2002	40		tobacco litigation
Walmart (Wal-Mart Stores)	\$2,866,904	2004	50	*	False Claims Act
WellCare Health Plans	\$200,000,000	2010	2		investor protection violation

APPENDIX: MULTISTATE AG SETTLEMENTS (CONTINUED)

Parent Company (Subsidiary—if name is different)	Penalty	Year	States	Federal Involvement	Offense
WellCare Health Plans	\$137,500,000	2012	9	*	False Claims Act
Wells Fargo	\$1,005,233,716	2012	49	*	mortgage abuses
Wells Fargo	\$575,000,000	2018	50		banking violation
Wells Fargo	\$23,700,000	2010	8		consumer protection violation
Wells Fargo	\$10,000,000	2005	21		consumer protection violation
Wells Fargo (Strong Capital)	\$115,000,000	2004	2	*	securities issuance or trading violation
Wells Fargo (Wachovia)	\$60,000,000	2008	na		investor protection violation
Wells Fargo (Wachovia)	\$58,750,000	2011	26	*	price-fixing or anti-competitive practices
Wells Fargo (Wachovia)	\$25,000,000	2006	51		investor protection violation
Western Union	\$94,000,000	2010	4		anti-money-laundering deficiencies
Western Union	\$8,529,000	2005	47		consumer protection violation
Western Union	\$5,000,000	2017	50		consumer protection violation
Weyerhaeuser	\$295,000	2002	3		consumer protection violation
Weyerhaeuser (Willamette Industries)	\$11,200,000	2000	3	*	environmental violation
Williams Companies	\$417,000,000	2002	3		energy market manipulation
Wind Point Partners (Vertellus Specialties)	\$2,275,454	2009	23		price-fixing or anti-competitive practices
Yellow Pages, Inc.	\$525,000	2006	27		consumer protection violation
ZF Friedrichshafen (ZF TRW)	\$183,750	2016	2		price-fixing or anti-competitive practices
Zurich Insurance	\$171,700,000	2006	10		price-fixing or anti-competitive practices

Note: for more details on these cases, see their entries in [Violation Tracker](#).

ENDNOTES

- 1 <https://www.atg.wa.gov/news/news-releases/attorney-general-s-22nd-legal-victory-against-trump-administration-forces-epa>
- 2 Susan McFarland, “20 states challenge constitutionality of Obamacare,” United Press International, February 27, 2018; https://www.upi.com/Top_News/US/2018/02/27/20-states-challenge-constitutionality-of-Obamacare/5841519735950/
- 3 For more on these policy cases, see, for example: Fred Barbash, “Litigation against executive branch by coalitions of states grows in response to unilateral actions by president and gridlocked Congress,” *Washington Post*, August 24, 2019; https://www.washingtonpost.com/national-security/litigation-against-executive-branch-by-coalitions-of-states-grows-in-response-to-unilateral-actions-by-president-and-gridlocked-congress/2019/08/24/34267560-c5bf-11e9-b72f-b31d7212_story.html
- 4 There are currently 24 state AGs identified as Republicans and 27 (including the District of Columbia) identified as Democrats; see [https://ballotpedia.org/Attorney_General_\(state_executive_office\)](https://ballotpedia.org/Attorney_General_(state_executive_office)).
- 5 There are exceptions. For example, while he was attorney general of Oklahoma, Scott Pruitt, who would later become a controversial head of the U.S. Environmental Protection Agency, almost never signed on to multistate litigation against corporations or brought such cases on his own.
- 6 This section draws from Jason Lynch, “Note: Federalism, Separation of Powers, and the Role of State Attorneys General in Multistate Litigation,” *Columbia Law Review*, December 2001; Colin Provost, “The Politics of Consumer Protection: Explaining State Attorney General Participation in Multi-State Lawsuits,” *Political Research Quarterly*, December 2006; and Paul Nolette, *Federalism on Trial: State Attorneys General and National Policy Making in Contemporary America* (University Press of Kansas: 2015).
- 7 A list of multistate AG cases from 1980 to 2013 compiled by Prof. Paul Nollette can be found at <https://paulnolette.com/attorneys-general-data/explanation-of-multistate-litigation-dataset/>.
- 8 <http://www.oag.ok.gov/attorney-general-hunter-celebrates-major-victor-for-the-state-after-judge-balkman-issues-572-million-judgment-in-opioid-trial>.
- 9 John D. McKinnon and Brent Kendall, “States to Move Forward With Antitrust Probe of Big Tech Firms,” *Wall Street Journal*, August 19, 2019; <https://www.wsj.com/articles/attorneys-general-to-move-forward-with-antitrust-probe-of-big-tech-11566247753>
- 10 Many of the 72 cases for which we could not determine the number of states were ones in which the federal government took the lead in the investigation. Many of these involved issues such as fraudulent Medicaid claims by drug companies selling nationwide, so it is likely that all or most states became involved.
- 11 The \$31 billion comes from the state portion of settlements in which the federal-state split was announced. In cases where it was not, the total penalty was used. In the Violation Tracker database, we adjust corporate penalty totals to avoid double-counting of settlements announced by both state and federal agencies.
- 12 It is also at the top of the list of most penalized parent companies in Violation Tracker: <https://violationtracker.goodjobsfirst.org/top-100-parents>.
- 13 It appears that the UBS settlement was mainly negotiated by the New York State Attorney General, but because it was nationwide in scope and because the announcement cited the involvement of the multistate ARS Task Force of the North American Securities Administrators Association, we treated it as a multistate case. The announcement can be found at <https://ag.ny.gov/press-release/attorney-general-cuomo-announces-settlement-ubs-recover-billions-investors-auction>. The involvement of NASAA was also mentioned in the New York AG’s announcement of the \$7 billion Citigroup auction-rate securities settlement -- see <https://ag.ny.gov/press-release/attorney-general-cuomo-announces-landmark-settlement-citigroup-recover-billions> -- as well as several other similar cases.
- 14 The offense breakdowns used here are the same as those used in Violation Tracker.
- 15 A list of the state AG web addresses can be found at <https://www.goodjobsfirst.org/violation-tracker-data-sources>.
- 16 The source field for the multistate entries added to Violation Tracker include a link to a representative press release from among those issued by various state AGs.
- 17 The Multistate Litigation Database can be found at <https://paulnolette.com/attorneys-general-data/explanation-of-multistate-litigation-dataset/>. The State Antitrust Litigation Database can be found at <http://app3.naag.org/antitrust/search/index.php>.
- 18 The multistate cases were almost always civil matters that ended in a settlement. About 10 percent of the single-state cases involved verdicts, and an even smaller percentage involved criminal charges.
- 19 A list of the offense types we use can be found at <https://violationtracker.goodjobsfirst.org/top-offense-types>
- 20 Entries derived from pages retrieved with the Wayback Machine list the Wayback URL of the page. Entries derived from the newswire archives on Nexis include a citation with the title, source and date.
- 21 The aggregate parent penalty totals in Violation Tracker are adjusted to avoid over-counting when there are overlaps between amounts listed in the state AG and federal agency entries for the same case.

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