Exhibit A



370 LEXINGTON AVENUE SUITE 1706 NEW YORK, NY 10017 212 682 1852 212 682 1892 FAX ahawkins@frankllp.com www.frankllp.com

September 19, 2018

VIA U.S. MAIL & EMAIL

Chief FOIA Officer Consumer Financial Protection Bureau 1700 G Street, NW Washington, DC 20552 CFPB FOIA@consumerfinance.gov

Re: FOIA Request Concerning National Collegiate Student Loan Trusts & Transworld

Dear CFPB FOIA Officer,

This is a request pursuant to the Freedom of Information Act, 5 U.S.C. § 552.

This request pertains to the following matters:

- Consumer Fin. Prot. Bureau v. Nat'l Collegiate Master Student Loan Trust et al., No. 1:17-cv-01323-UNA (D. Del. 2017) [hereinafter "NCSLT Action"].
- *In re Transworld Sys., Inc.*, Admin. Proc. No. 2017-CFPB-0018 (Consumer Fin. Prot. Bureau 2017) [hereinafter "Transworld Action"].

We request that the Bureau provide us with copies of the documents in the Bureau's possession that pertain to the facts set forth in (1) the Complaint in the NCSLT Action (entered therein at Dkt. No. 1), (2) the Proposed Consent Judgment in the NCSLT Action (entered therein at Dkt. No. 3-1), and (3) the Consent Order in the Transworld Action (entered therein at Doc. 1).

Such documents in the Bureau's possession include, but are not necessarily limited to, transcripts of any investigation-hearing testimony by the following individuals:

- Chandra Alphabet;
- Francesca Giampiccolo;
- Kristian Knochel;
- James Cummins;
- Dudley Turner;

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- Danielle Gray;
- Colleen Morgan;
- Jonathan Boyd; and/or
- Demetrius Cyrus Nickens.

In order to help you determine our status for the applicability of any fees, we are requesting these documents because we serve as Plaintiffs' counsel in two civil action brought on behalf of proposed classes of consumers alleging consumer-protection law violations against defendants including Transworld and four National Collegiate Student Loan Trusts.¹

Many of our clients' allegations reflect the Bureau's findings of fact in the above-referenced Actions.

We are willing to pay fees for this request up to a maximum of \$1,000, without further consultation. If you estimate that the fees will exceed this limit, please contact me.

If you have any questions about processing this request, please do not hesitate to telephone me at any time. My direct dial is below.

This request is being submitted via both email and regular mail. Please feel free to send the requested documents via either email or regular mail, using the contact information below. Thank you in advance for your prompt attention to this request.

Sincerely,

Asher Hawkins

FRANK LLP

370 Lexington Avenue Suite 1706

Suite 1706

New York, NY 10017 ahawkins@frankllp.com

Tel.: (212) 682.1852 Fax: (212) 682.1892

¹ These actions are: *Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al.*, No. 1:18-cv-07692 (PGG) (S.D.N.Y. 2018); *Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al.*, No. 1:18-cv-01781 (PGG) (S.D.N.Y. 2018).