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April 10, 2023

BY PERSONAL SERVICE, U.S. MAIL, AND EMAIL

Harish K. Chopra
President
Title Lock Corporation
12636 High Bluff Drive, Suite 400
San Diego, CA, 92130
harish@hometitlelock.com

Re: Subpoena to Home Title Lock Regarding Deceptive Advertising to Homeowners

Dear Mr. Chopra:

We write on behalf of San Francisco City Attorney David Chiu and San Diego City Attorney Mara Elliott concerning Home Title Lock's unlawful and deceptive advertising.

Home Title Lock's advertisements contain numerous false representations. In particular, recent local advertisements suggest: (1) home title theft is a widespread problem, as recognized by the FBI; (2) title fraud results in a loss of title or home equity; (3) it is easy to transfer title to properties fraudulently; and (4) the service actually protects or "locks" the title.

None of this is accurate. In fact, home title theft is uncommon and cannot lead to the loss of home ownership or equity. (See, e.g., *WFG Nat. Title Insurance Co. v. Wells Fargo Bank, N.A.* (2020) 51 Cal.App.5th 881, 890.) Individuals in Home Title Lock's advertisements misrepresent their experiences as victims or perpetrators of home title theft. The FBI told ABC News that it does not track title fraud statistics. (See Mike Levine, *Prolific Ads Featuring Right-wing Icons Push Questionable Claims About US 'Crime Wave'*, ABC News (June 14, 2022).) Fraudulent deeds need to meet formal requirements before being recorded—including being notarized, which involves presenting identification—and are very likely to be discovered before any subsequent loan or sale. And Home Title Lock does not and cannot "lock" anything. The company just provides notifications at some time after a new document is recorded—a service many recorders' offices provide for free.

The misrepresentations by Home Title Lock stoke unfounded fear, undermine public trust, and unfairly slant the field of competition. Importantly, they also appear to violate multiple California laws, including California's Unfair Competition Law, which authorizes remedies including injunctive relief, restitution for customers who purchased Home Title Lock's product, and civil penalties of \$2,500 per violation generally and \$5,000 per violation against elderly or disabled consumers. Given the number of misrepresentations in the company's advertisements and its prolific advertising, the number of violations is likely quite substantial.

Harish K. Chopra
Page 2
April 10, 2023

As part of our offices' investigation into the scope of these violations in our two cities and throughout California, the San Francisco City Attorney has issued the accompanying subpoena to Home Title Lock. Please contact Alexander Holtzman at alexander.holtzman@sfcityatty.org or 415-554-3999 if you have any questions regarding this letter or the subpoena.

Thank you in advance for Home Title Lock's prompt and complete response to the subpoena.

Very truly yours,

DAVID CHIU
San Francisco City Attorney



ALEXANDER J. HOLTZMAN
Deputy City Attorney

MARA ELLIOTT
San Diego City Attorney



JULIE RAU
Deputy City Attorney