

REGULATORY OVERSIGHT: S01 Ep08, A CONVERSATION WITH NEVADA ATTORNEY GENERAL AARON FORD

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Stephen Piepgrass:

Welcome to another episode of Regulatory Oversight, a podcast that focuses on providing expert perspective on trends that drive regulatory enforcement activity. This podcast features insights from members of our firm's Regulatory Investigations, Strategy + Enforcement group, including its nationally ranked state attorneys general practice, as well as guest commentary from business leaders, regulatory experts, and, important for today, government officials. We cover a range of topics important to businesses operating in highly regulated areas. Before we get started today, I wanted to remind our listeners to visit and subscribe to our blog at regulatoryoversight.com so you can stay up to speed on developments and changes in the regulatory landscape.

Today, I'm joined by my colleague Ketan Bhirud, and we are honored to have a very special guest, Nevada Attorney General Aaron Ford. General Ford has served as Nevada's Attorney General since 2019. During his tenure, General Ford has made protecting consumers from fraud, scams, and anti-competitive activity a top priority. Before being elected, General Ford served as the majority leader of the Nevada State Senate. While in the legislature, he also served as the minority leader, assistant majority whip, and held a number of other leadership roles on several committees.

General Ford, it is an honor to have you with us today.

Attorney General Aaron Ford:

Stephen, I appreciate it. You and I are old friends now, having known each other for, what, five minutes. But I'm going to give you a little secret, because I don't want you to get upcharged when you come visit us out here. It's Nevada. It's how we pronounce it, as opposed to Nevada. I'm just saying, if you come in saying Nevada, you might get a upcharge. I can't do anything about that. That's not price gouging. It's just literal. That's the consequence of pronouncing the name wrong. And then secondly, I'll get to also tell you that my name is actually Aaron. It's apron with no P, so it's pronounced Aaron. So Aaron Ford from Nevada, and I'm happy to be here. Thank you so much.

Stephen Piepgrass:

Thank you. Hopefully, I'll get it right when I come and visit you.

Ketan, I know you previously worked with General Ford in the Nevada AG's Office as chief litigation council.

Ketan Bhirud:

Yeah. Thank you, Stephen. I think apart from introducing Attorney General Ford of the State of Nevada and getting his name and the name of the state wrong, great job. No, I kid. As Attorney General Ford said, I lived here for about 12 years, and I worked in Nevada Attorney General's office for four years, so I'm very familiar. We take it very seriously, the pronunciation of our name. And apart from getting upcharged, as a lawyer, you should know if you go into court, you get the



name wrong, the judge will be unhappy whether or not she rules against you. You might not be happy. But thank you.

Stephen Piepgrass:

They are good tips are all practitioners. I like that.

Ketan Bhirud:

Yeah. So General Ford, thank you for taking the time. I really appreciate it. Before we get into some of the substance, I just wanted to ask you a little bit about your background. I know you got a really interesting and fascinating background. Can you just tell us a little bit about your background, your experience, and kind of how that led you to becoming the attorney general of Nevada?

Attorney General Aaron Ford:

Sure, sure. Well, first off, Ketan, it's always great to see you. Thanks so much. I had a great time working with you for the time I was able to keep you. He says I didn't run him off, and I'm going to take his word on that.

Attorney General Aaron Ford:

I had a varied background. This is not my first career. It's certainly the longest career I've had, but my first career was as a public school teacher. I used to teach math at the middle school level and at the high school level. I actually have a vast background in education, including four degrees in education, my PhD in education. So I thought that I was going to law school to open up some schools. That's what I wanted to do. I wanted to open up some international schools.

Ketan Bhirud:

Still might.

Attorney General Aaron Ford:

Yeah, never know. Never know. But I got into law school, learned about this area of law called school law where lawyers represent school districts and universities and other public and governmental entities, and I got wooed away. I went to a law firm down in Dallas practicing school law, and then moved over to Weil, Gotshal & Manges as a complex commercial litigator. I've been practicing law since '01, and I've enjoyed that thoroughly.

Attorney General Aaron Ford:

Got here, back to Las Vegas. I've been here twice. My wife and I moved here, I like to say, at the turn of the century, in the year 2000. My wife is a lawyer as well, and she clerked on the Ninth Circuit Court of Appeals for Judge Johnnie Rawlinson. I got a job with the same judge, and we ended up being here for about three years, moved back to Texas, and came back here in '07 for another job opportunity that my wife had.

Attorney General Aaron Ford:

I got into politics about three years later. I ran for office to be in the state senate. Trying to utilize my background in education, I wanted to focus on education policy at the state senate level. I lost my first race miserably. Got stomped like 62 to 20-something. But as Big Sean says, last night I



took a L, but tonight I bounced back. So we bounced back, and two years later I ran for the state senate, won that race and have been working in several areas of government ever since.

Attorney General Aaron Ford:

Really enjoy this opportunity to be in the Office of Attorney General. I ran for this office as a midterm, second-term senator as majority leader in the state senate at the time. And I ran, frankly, because I wanted to be in the position to be able to help more people quicker on more items and a more broad base. I'm fortunate to be here, and it's the best job I've ever had.

Ketan Bhirud:

I also tell people that working in the Nevada Attorney General's Office was the best job I ever Had, and if any lawyer gets a chance to do some time an Attorney General's Office, they should.

Ketan Bhirud:

I'm going to tie two things you said together. You didn't run me off. It was exactly what happened with you. My wife had a job opportunity DC.

Attorney General Aaron Ford:

You didn't go there, okay.

Ketan Bhirud:

When your wife asked you to move for jobs, you know how that goes. You did it at least twice.

Attorney General Aaron Ford:

That's exactly right.

Ketan Bhirud:

I've heard you talk about justice a lot. You said there's no greater task that you think than the pursuit of justice. I hear a lot of people use that term, and I think justice is one of those terms that people can use to mean different things, and sometimes contradictory things. So I'm going to ask you, what does pursuing justice mean to you, and how are you using your office to pursue justice?

Attorney General Aaron Ford:

That's a great question. You were here on day two on the job when I introduced myself to my 400 new colleagues, and I talked about the area of focus that we would have in this job. Attorneys general bring in all areas of focus when they come in, and my immediate past predecessor, to his credit, had a focus on many things, but including the Office of Military Legal Assistance. He focused on that, and he focused on guardianship. His predecessor, our current US Senator Catherine Cortez Masto, focused on sex trafficking. She focused on the housing crisis, and I said that I wanted my focus to be on one word, justice.

And as you may recall, I said on day two on the job that justice is in the eye of beholder sometimes, but it doesn't always manifest itself like said in arrest and conviction. To be sure, you're a bad guy, we're going to get you. That's part of justice, but sometimes justice manifests itself in an exoneration and compensation. Our systems, including the criminal justice system, are



made of people. People are fallible, and part of justice is to recognize the fallibility of our systems. I've been in this office for three years and eight months, and we have been able to be on panels that have exonerated and compensated no less than half a dozen individuals. That's part of justice, too.

So focusing on justice through the criminal justice system, being one. Focusing on what's called my three Cs. The first C was criminal justice. The second C is consumer protection. Stephen mentioned that at the outset. Ensuring that we have someone in this office who's trying to ensure that our residents, whether they be businesses or individuals, aren't taking advantage of by unscrupulous companies. Bringing justice to them, both as people who have been defrauded, but also to the fraudsters as part of consumer protection C.

And then the third C I focus on was the protection of our constitutional and civil rights, every single one of them. We saw our ability to do that in this office manifested itself through defending our elections last go around, for example. Focusing on ensuring that every constitutional right is protected and important. So that's how, in our office, we try to manifest that. Not to the exclusion of other things, to be sure, but certainly justice under my three Cs as we can talk about it.

Ketan Bhirud:

One of the things I've heard you say that I really appreciate and I agree with is that justice isn't just about the cases you pursue, but it's about the ones you don't do. Because in every potential crime, there's not just a victim, but there's the accused who may or may not be guilty.

Attorney General Aaron Ford:

That's right.

Ketan Bhirud:

You have to be thoughtful about it, and so I appreciate that.

Attorney General Aaron Ford:

Absolutely right. Yeah, yeah. And even beyond the criminal justice system, justice manifests itself in every aspect. If you are in administrative law practice and you are before a board, you expect to be treated fairly. You expect that constitutional protections of due process and equal protection apply, and that's part of justice. So I think it transcends all that we do, which is why I say, and if you were to ask anybody in my office, they would say that our job is justice.

Ketan Bhirud:

Well, that's great. I'm going to put a pin on that, because I'm going to ask about that later. You made great transition with justice not just being about the criminal cases you pursue, about the civil ones, too. I want to ask about that later, but I want to turn to that general area of consumer protection actions and emerging enforcement trends. I saw on your website, and I just heard you say that consumer protection is one of your main areas of focus. Given that, I wanted to ask, what are the key consumer protection issues your focused?



Well, I'll say this, our Consumer Protection Division has been quite busy, and the area of focus varies. Frankly, during the COVID time period, our consumer protection issues looked at issues of price gouging, which led to me passing a bill related to price gouging.

Ketan Bhirud:

Yeah.

Attorney General Aaron Ford:

You recall. I'm certain it was comparable in Virginia. Go in to a grocery store, Smith's out here for example, and trying to find some toilet issue. To be sure, supply and demand had some effect on it, but sometimes it was just greed. The pricing was just too high. We looked at the circumstances what led to that. We had an eviction moratorium in place during that time period, for example. You have consumers in the residential context that my office was engaged to protect, but also to ensure that landlords weren't being taken advantage of during those circumstances as well.

But a lot of times our focus is based on consumer complaints that we receive. When you were here, you had a website that had a link for a complaint. Sometimes we get issues related to cars or insurance or whatever the case is, and so sometimes that drives what our focus is. Sometimes conversations with other attorneys general around the nation, or the conversations that my colleagues have with their counterparts in those offices. Sometimes that drives what our focus is on consumer protection. And then thirdly, I'll say sometimes it's just an organic approach that we take, taking a scope and a view of what's happening in our state to see if we should engage on some level of conversation. So that's how we focus. Not particularly to say what we focus on, but again, it kind of varies on what's happening at the time.

Ketan Bhirud:

No, that makes sense. One of the things I heard you say was when you were looking at the increased pricing in the grocery stores, that sometimes it was caused by supply and demand, and sometimes it was caused by greed. What can you tell us about, if not that specific issue, how you determine when it's greed versus supply and demand? What are the criteria you're looking for or that you tell your staff to look at when you're deciding which investigations to pursue?

Attorney General Aaron Ford:

Yeah, that's a great question. And as I indicated, the COVID pandemic led to me passing a law, our state's first law that allows for the office of attorney general during emergencies, during sets of emergencies to enforce anti price gouging measures. We didn't have that authority or that particular mechanism in place. So we had to use antitrust, other forms of deceptive trade practices and try to crack down on those things.

So when we drafted our statute, we worked with all interested groups. We worked with the retailers. We worked with the chambers. We worked with consumer interest groups, legal aid. And we crafted language that takes into account, for example, not just supply and demand, but also supply chain issues. So the statute kind of details and delineates what issues we need to consider in determining whether there are price gouging concerns.



And again, this statute only applies during states of emergency. Many other states already had that in place, and they were able to capitalize on that and protect the residents during that time period. We just, again, talked to all of the interested parties and put into statutes certain parameters that my BCP, Bureau of Consumer Protection, will take a look at.

Ketan Bhirud:

You've done a great job of helping us kind of understand the criteria your office uses when they're determining whether or not to start an investigation. But as we touched on, as we both know from our time in this office, not all investigations end in enforcement action. So once you've started that investigation, what are the criteria you and your staff consider when determining whether to bring that enforcement action or whether to say, "Hey, no, we've looked at this, and we're satisfied with how the company's behaving"?

Attorney General Aaron Ford:

Two responses to that. First of which is the overarching statement that I made at the very beginning. What our job is, is justice. And the question that I've had, you could ask people, they'll tell you that I ask them, "What does justice look like in this circumstance?"

Ketan Bhirud:

Okay.

Attorney General Aaron Ford:

What does it look like? Is it that this was a one-off that this organization or entity was engaged in that has caused issues, or is this a prevailing form of interaction that these folks do? And that informs what we talk about. But the first question is, what does justice look like?

And then secondly, again, we look at the gravity of a circumstance and the situation, and try to associate a particular response in a measured way in response to what we're seeing happening. Sometimes we don't enforce. Sometimes it's simple enough to say ... And this happened, for example, in the COVID context with some of our housing situations. My team would reach out to a landlord and say, "We're getting reports about X, Y, and Z, but the law says ABC," and the response may be, "My apologies. I didn't realize it." Ignorance of the law is no excuse, people say, but we do recognize that some people just don't know, especially during-

Ketan Bhirud:

It's a mitigating factor.

Attorney General Aaron Ford:

Exactly. And certainly during the times of COVID where things were so transient and fluid, you had to be responsive in that same fashion. So sometimes we didn't have to enforce. We just had to talk, and they were able to rectify them in that situation themselves. Those are a couple of ways in which we make determinations.

And then the last ... I said there were two things. There's a third, and you heard me say this. I'm pretty confident that you were in Scottsdale back in November.

Ketan Bhirud:

I was.



That's right, at one of our conferences. And what I said on the day at the time was, "Look, I don't mind giving the people the benefit of the doubt, but it presumes something. It presumes that I know you." People say, "It ain't what you know. It's who you know." I actually add another line to that. It's not who you know. It's who knows you. And if I get a complaint about an entity or an individual or a company I know nothing about, why do I need to give the benefit of the doubt to them? It's important for people like you who've done a great job of maintaining relationships with me, talking to me about your clients. So I can say, "I'm reading this, but I know this organization. This looks like a one-off to me, so let me reach out and talk to them." I think that's important. So this form of conversation is important. Kudos to you and your firm for having these conversations, because it lends itself to our ability to give the benefit of the doubt, because we know who you are.

Ketan Bhirud:

No, thank you for that. It's good to hear that they're appreciated, and it goes both ways. I think you answered this in core, in terms of what you're looking for in terms of bringing an enforcement action. But suppose a company then becomes the focus of an enforcement action by your office. What traits are you looking for them to display? Now that you're in our target, you're in our crosshair, how would you like them to behave, or what would you like to see? What would you consider mitigating factors apart from, "It was a mistake, sorry"?

Attorney General Aaron Ford:

My response would be somewhat utopic, but it's also tethered to the fact that I'm a realist and I'm a litigator. I know that litigation and confrontation and being on other sides of the V doesn't always lend itself to what my utopic answer is. My utopic answer is contrition. It's acknowledgement. It's apology to be sure. And it is some effort to address the issue without me having to take you all the way to court or to have to levy some form of penalty on my own. I would love to see that type of interaction.

One of the things when I was clerking on the main circuit, the judge used to ask people is, "What's the one thing the other side had said about you that you can acknowledge that's true? What's their best argument that you have to agree with?" And comparably, I will ask a company, "Is this true? What part of this is true? What would you admit? What will you acknowledge?" In the context of, for example, a settlement discussion, which obviously we wouldn't be able to use in trial for certain purposes, but I would like to have an open, honest conversation about what's transpiring, what's transpired, and what the appropriate level of response is.

Ketan Bhirud:

So is the idea that by being honest about the weaknesses potentially in their case, they can gain credibility with you that would help get a better settlement that they might not otherwise, or how would you articulate it?

Attorney General Aaron Ford:

Well, I think that's one way of articulating it. And I think it's accurate, because again, our job is justice. I'm not trying to ruin unless the meted punishment in fact should be ruining in the company. We're not trying to put you out of business. We're not trying to actually destroy you, unless again, the circumstances call for it. We want to be able to remedy the circumstance for our



residents, but at the same time, allowing you to redress and correct, and then continue moving forward.

Ketan Bhirud:

Got it. That's super helpful. Closing the gap on this consumer protection portion of the conversation, looking forward, are there any specific businesses or issues you think will face increased scrutiny in the coming years?

Attorney General Aaron Ford:

Probably not in a position to be able to acknowledge that out loud right now. But what I will say is what we endeavor to do, and we've done this over the course of my three years and eight months here, is to try to reach out to companies before we do something public. Before we issue a CID, we'll reach out to you, Ketan, and say, "We have a company that we think you represent, and we need to have a conversation." Maybe it's a friendly CID because you want to help, but you can't absent some compelled process. So while I can't speak to a specific industry or company or anything like that, that may be in a, to use your phrase, in the crosshairs in the future, just know that the overriding focus of this office is justice. We're going to rely upon that as we interact, which includes reaching out to you proactively when we can.

Ketan Bhirud:

So that raised another question I had, because I get it a lot from clients. Before an issue arises, when should they be proactive about engaging with your office, and how should they do that? Because their concern is that, "Hey, if we start building that relationship, this attorney general or the attorney general community will think we're doing something wrong or we have a concern." But I've found that it is better to build those relationships like you said. How can companies go about doing that in a way that doesn't make you raise your eyebrow, "Hey, why are they coming?"

Attorney General Aaron Ford:

Well, you're asking me specifically, so I can only speak for me. I can't speak for other attorneys general, and so my response is again, tethered to what our job is. I think the approach is just you reaching out to me, you having conversations. And the moment you know or even frankly, even suspect that there may be an issue, you should connect with our Bureau of Consumer Protection. You should call me. If you have my number, you should call me, right? And I could put you in touch with the right folks. I hear you, right? It's human nature not to want to approach someone when you are potentially at fault with something that has taken place, but we have to get over that. We have to reach out. And again, if you developed a relationship, then there's more of a chance that the call is better received than one that's cold. But even if you don't have a relationship, you should still reach out, because that also lends itself to us giving you credibility at the outset and having a conversation around some issues that may need to be addressed.

Ketan Bhirud:

I want to turn to an issue that I think is important to you, which is efforts to bridge the gap between Republicans and Democrats, both at the elected level and outside the elected level. And you can say, "No, that's not important to me, Ketan. Shut up." But I think it is, because I saw on your website that you have endorsements from numerous Republicans, including the man was the Senate minority leader when you were the majority leader. And I know that's not very



common. Normally, that's a very adversarial relationship between two people. That indicates to me that it is important to you to bridge that gap between Republicans and Democrats. So I guess my question is, am I correct? And if so, why is that important to you?

Attorney General Aaron Ford:

I'm going to nuance this answer because I'm not going to talk about the campaign and the political components.

Ketan Bhirud:

Got it.

Attorney General Aaron Ford:

We're sitting here in my office. We've got to be careful around that issue.

Ketan Bhirud:

Yes.

Attorney General Aaron Ford:

But what I can say is you're right. Relative to reaching out to divergent interests and divergent parties on particular issue. I've never thought that I've had a monopoly on good ideas, nor do I have a monopoly on bad ideas. Let's be clear. I don't know everything about anything, let alone everything about everything. So the way I operate is to try to bring to the table people who are stakeholders in whatever the issue may be. Price gouging is an example. Antitrust issue is an example.

So when you talk about people from different viewpoints, it is important to me personally to try to engage those individuals. Now, to be sure, it's not easy. It's not. It's not, right? And sometimes things are just so controversial or combative that it's hard to move beyond that impasse, but I had to take the effort. And I would encourage those who are listening to likewise undertake that particular effort. Because I'll say this, as the attorney general, the residents of this state expect me to get things done. They don't expect me to sit in the silo, ignore other positions and other viewpoints. They want things to be done, and it's incumbent upon my office to ensure that happens. So that's why we have an open door policy when it comes to those types of conversations.

Ketan Bhirud:

There's been a long history -- And I've worked in this office, and I saw it -- of attorney generals working across party lines through NAAG on different investigations and things, but it seems like recently there's been some fissures in the community, particularly as it relates to NAAG. I've seen some attorney generals criticizing what they perceive as partisanship. So what are your state's thought on the state of bipartisan cooperation amongst the attorney generals today? I'm just going to lead with I do think there is some issue. So what can we do to repair that relationship?

Attorney General Aaron Ford:

Listen, no, I think that's a fair question and one that I can certainly speak to in my capacity as attorney general. Yes, I agree that there are some fissures between Democrat attorneys general



and Republican attorneys general right now. I think they preexisted me becoming attorney general, let's just be clear, but I do think that there are some issues that we need to address.

How do we address it? It begins with conversation. True, candid, open and honest conversation on sometimes some very tough and controversial issues. I am unafraid of having conversations about tough topics with people with whom I disagree.

Ketan Bhirud:

We've done it.

Attorney General Aaron Ford:

You and I have done that, right?

Ketan Bhirud:

Yeah.

Attorney General Aaron Ford:

And so have I also with other attorneys in general, let's be clear. And it seems to me that that's the approach I would take. That's the approach that I would expect folks to take. If folks have a problem with something that I'm doing as attorney general, and you are a Democrat or Republican, you should approach me. You should talk to me. You should let me know. And I've had that happen a few times where someone would say, "Well, I think that that was an unnecessary statement, Ford." And I was looking at it, and I've been able to say, "Oh, you know what? I hear you. Let me acknowledge that out loud and say, 'My apologies.'" But a lot of times people are not willing to engage in tough conversation.

Ketan Bhirud:

Yeah.

Attorney General Aaron Ford:

Honestly, I think it's easier for us at the NAAG level, for example, to talk about consumer protection or antitrust, and align ourselves on things that are a little less controversial. It's difficult to talk about social issues. And I've found that the last few years where we've had social unrest in our country, that has touched on many communities, including mine. I'm an African American male who had some opinions to some things that have taken place. It seems to me that some are unwilling to talk about those and unwilling to address those and actually boycott the opportunities that they present themselves for those conversations. And I don't think that's beneficial. So it seems to me that one of the ways to address it is to show up and engage in conversation, agree to disagree amicably without being disagreeable, and then let's continue to work together on things where we can find commonality, all the while appreciating the positions of other individuals.

Ketan Bhirud:

No, I agree with you, because I don't think we can find solutions without having those conversations. And I think it needs people like you who have the humility of, "Hey, this is where I'm coming from. This is my experience. These are my thoughts, but I know I'm not 100%, so we



need to have the conversation where I can figure out where I'm right and where I'm wrong, and convince you where you're right, where you're wrong."

Attorney General Aaron Ford:

Yeah. And there have been circumstances, a handful where I have been disappointed with statements or comments made by my colleagues on the other side of the aisle. My approach is to reach out to them directly and to let them know, "I took issue with what you said. It's just a matter of fact." And through that conversation, there's not been one time where I reached out to someone that I had an issue with where we have said, "Well, screw you. We just won't be friends anymore." We've been able to address the issue and move on.

Ketan Bhirud:

So that's really helpful for understanding the current state of the attorney general's bipartisan relationship and kind of where things are with NAAG.

I want to turn a little bit to your efforts to partner with the private sector, and I know you've done a lot. I don't know all of it, because I've been gone for a couple years now, but I saw it start when I was here. I know you personally made efforts to partner with the private sector. I remember seeing at the beginning of the pandemic, you partnered with Aaron's to deliver 500 mattresses to shelters across Nevada. I thought that was wonderful. So other companies can understand if there are opportunities for them to do that, can you tell us a little bit about how that came about and what opportunities you're looking for to partner with the private sector, or what opportunities people in the private sector should be looking forward to come to you?

Attorney General Aaron Ford:

I do recall doing a lot during the pandemic that was not in my job description, let's be clear. So what happened was in this circumstance particularly, there have been stories about early on in the pandemic, homeless individuals who were sleeping in the parking lot right over across the street at the Cashman. Aaron's saw that on TV, and they reached out to me directly because we had a relationship. They said, "What can we do?" Then we came up with an opportunity to partner and such that we were able to, as you've indicated, give 500 mattresses. They had them built specifically to address some of the issues they saw in Nevada. Had them built down, I believe it was in Phoenix. Had them shipped up here, and we were able to deliver some of those mattresses, frankly, not only to homeless shelters, but also to battered women's shelters.

Ketan Bhirud:

Wow. Yeah.

Attorney General Aaron Ford:

Because listen, during COVID we were telling people to stay home because it's dangerous outside, but sometimes the danger is inside. And domestic battery, unfortunately those instances rose during that time period. Some of the victims of domestic battery had nowhere to go, and the shelters had not enough resources. So we were able to work with them, which brings up another opportunity for partnership where I reached out to then Piper Overstreet, who was at Uber. We were able to partner to get free Uber rides for those who were trying to flee domestic abuse circumstances to get to these women's shelters that have these new mattresses. So that was part of the partnering they did as well.



Another thing that we did was to partner with Sherwin-Williams, because at the beginning of the pandemic, we couldn't find masks. First responders didn't have masks. We were able to receive from them PPE delivered right here to my office. They were sitting right here in the foyer. You walked right past where they were sitting, 5,000 or so of them. We had the national guard from my state come here, pick them up, and they were able to get them distributed to first responders.

Again, these were not things in my job description per se, but things that were important to bring assistance and relief to the residents of this state during a time where we were all suffering. So to answer your question, at the end of the day, my suggestion is that if you are interested in partnering with my office, I'm interested in partnering with you. We'll figure out a way to get it done. So reach out to me. You can call me directly. And if I have suggestions on things you can do to help me, likewise. I'm going to comparably reach out and try to arrange those partnerships.

Ketan Bhirud:

Like I said, it goes both ways. We got lots of clients in the spaces. So if you have needs, reach out to us, and we'll go find them.

I think we're running out of time here, so I want to kind of wrap up. I really appreciate you taking the time here, and I thought this was really helpful, both to me and hopefully to our audience. The last one I want to end on, I just want to ask you. You've given us all your time to answer all my questions. Is there anything that you want to talk about, or are there other areas that you want companies or individuals to know that your office is focused on, or anything like that?

Attorney General Aaron Ford:

I'm actually going to not answer that question. I'm going to ask you another question.

Ketan Bhirud:

Okay. I thought I asked the guestions.

Attorney General Aaron Ford:

Yeah, I got it. I got it.

Ketan Bhirud:

No, go ahead.

Attorney General Aaron Ford:

What I would like to know is from your perspective, what could we be doing better? What can my office particularly, and I guess generally speaking AG's office as well, what could we be doing better as we endeavor to fulfill our mission and our statement as we interact with your clients? What could we be doing?

Ketan Bhirud:

That's an interesting question being that I represent clients before you, so it's hard to give any criticism.



Like I said, I'm open to it.

Ketan Bhirud:

Yeah. No, I think the most important thing ... And Stephen's on the line too, and so I'd like him to chime in if he has anything. But I think for me, when I'm representing the client and we're dealing with an attorney general's office, it's -- And I think your office has been good about this -- being available to listen to those, right? Having that conversation, because some level of time an investigation starts because of a misunderstanding, and the misunderstanding might not be, "Hey, you think we've engaged in this behavior, and we have not." It more often is, "You think we've engaged in this behavior, and yes, it happened two times, not to 2000 times. And we care more about it than you because it's bad for our customers, and it's bad for our business."

Ketan Bhirud:

So we like being able to have those open lines of communication and come to you and tell that story, and have you receive it with an open mind. I think your office has been good about that, but I think that's the most important thing. I think it's been kind of the theme of our conversation, is having those conversations, being open and listening. But Stephen, do you have anything specific?

Stephen Piepgrass:

Ketan, I think that is a great answer. Absolutely, yes. I think allowing our clients the opportunity to tell their story when they engage with your office. It's just so important. At the end of the day, when the investigation wraps up and there's a settlement, the AG's office and our clients will continue to interact together. We recognize that. You recognize that. It's important that they have a solid foundation to build upon. And when we enter into negotiations with your office or with other AG's offices, having done so in a manner that is respectful where both sides are listening to each other and where you can lay a solid foundation for the future and their future interaction, I think that's really priceless.

Stephen Piepgrass:

It sends a message to the business community too, that you understand where they're coming from. That you're interested in not just getting it right, but getting it right in the right way, and then setting them up for success for the future so that whatever ended up creating the problem in the past can be put behind them, and they can move forward being the good corporate citizens they really want to be.

Attorney General Aaron Ford:

That message is loud and clear on this side. We will endeavor to continue doing that and increase and augment our efforts in that particular regard. So I appreciate that feedback. Let's just continue to move along, and I look forward to the relationship in the future.

Ketan Bhirud:

And let me give a shout out to your senior staff, Kyle, George, and Jessica. They're great. They always respond. They pick up the phone.



Those are my people. I can't do it without them. So appreciate that.

Stephen Piepgrass:

Ketan, thank you. General Ford, it has been a real honor and a pleasure to hear from you today, to talk with you today. I want to thank you. I know our listeners are really grateful for your candid remarks, for how you've approached this whole conversation from the dialogue that you've entered into with us. We really appreciate your insights.

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