

Troutman Pepper Locke State Attorneys General Monitor – December 11, 2025

WRITTEN BY

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State attorneys general increasingly impact businesses in all industries. Our nationally recognized [state AG team](#) has been trusted by clients for more than 20 years to navigate their most complicated state AG investigations and enforcement actions.

State Attorneys General Monitor analyzes regulatory actions by state AGs and other state administrative agencies throughout the nation. Contributors to this newsletter and related [blog](#) include attorneys experienced in regulatory enforcement, litigation, and compliance. Also visit our [State Attorneys General Monitor microsite](#).

Contact our State AG Team at StateAG@troutman.com.

PODCAST UPDATES

The 12 Days of Regulatory Insights

We are excited to share our special holiday series, “The 12 Days of Regulatory Insights,” as part of our Regulatory Oversight podcast. This 12-part series covers a variety of critical regulatory topics, offering concise and insightful discussions from members of our Regulatory Investigations, Strategy + Enforcement practice group, State Attorneys General team, and several esteemed colleagues across various areas of the firm.

- [12 Days of Regulatory Insights: Day 1 – Potential Impacts of 2025–2026 State AG Elections](#)
 - [12 Days of Regulatory Insights: Day 2 – How AGs Are Shaping Health Care Markets](#)
 - [12 Days of Regulatory Insights: Day 3 – How the BBB Shapes Regulatory Outcomes](#)
 - [12 Days of Regulatory Insights: Day 4 – Open Records Realities](#)
 - [12 Days of Regulatory Insights: Day 5 – Privacy Under the Microscope](#)
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STATE AG NEWS

HelloFresh Agrees to Oregon AVC Over Alleged Discount and ‘Free’ Claims

By [Troutman Pepper Locke State Attorneys General Team](#)

The Oregon Department of Justice and Grocery Delivery E-Service USA, Inc. d/b/a HelloFresh (HelloFresh), recently filed an [Assurance of Voluntary Compliance](#) (AVC) in Oregon Circuit Court to resolve allegations by the Department of Justice (DOJ). HelloFresh is a meal-kit company, providing meal kits, ready-to-eat meals, and other products directly to consumers.

[Read more](#)

Delaware Imposes Nearly \$1M Penalty on Investment Adviser for Registration, Supervision, and Recordkeeping Failures

By [Troutman Pepper Locke State Attorneys General Team](#)

On November 21, Delaware Attorney General Kathy Jennings' Investor Protection Unit (IPU) announced a \$995,180 penalty against Kovack Advisors, Inc. (Kovack) for a series of violations of the Delaware Securities Act. The enforcement action — resolved through a consent order — highlights the IPU's growing focus on registration accuracy, supervisory systems, and books-and-records compliance for investment advisers operating in the state.

[Read more](#)

Texas AG Secures \$41.5M Settlement With Pfizer and Tris Pharma Over Allegedly Adulterated ADHD Drug: What Health Care Stakeholders Should Know

By [Troutman Pepper Locke State Attorneys General Team](#)

The Texas attorney general (AG) [announced a \\$41.5 million settlement](#) with Pfizer and Tris Pharma related to allegations that the companies provided adulterated pharmaceutical products to children and manipulated testing to secure Medicaid reimbursement in violation of the Texas Health Care Program Fraud Prevention Act (THFPA).

[Read more](#)

Virginia's Vapor Product Directory Challenged in Federal Court

By [Bryan Haynes](#), [Agustin Rodriguez](#), and [Zie Alere](#)

Earlier this fall, a small manufacturer and retailer (the plaintiffs) sued Virginia Attorney General (AG) Jason Miyares and Tax Commissioner James Alex (the defendants) in the U.S. District Court for the Eastern District of Virginia, seeking to enjoin their enforcement of Virginia's vapor product directory regime, [Va. Code Ann. §§ 59.1-293.14 to .21](#), which the General Assembly passed in 2024.

[Read more](#)

AG OF THE WEEK

Nick Brown, Washington

Nick Brown is Washington state's 19th attorney general (AG), elected in November 2024 and sworn into office in January 2025. As AG, Brown leads the state's chief legal office, which provides legal services to more than 230 state agencies, boards, and commissions. He is committed to using the legal tools and authority of the office to uphold and enforce Washington's laws, protect people's rights, and keep residents safe.

Brown's priorities as AG include protecting public safety, advancing environmental and worker protections, defending civil rights, and holding powerful interests accountable when they violate state laws. The AG's office

also works to protect consumers and seniors from fraud, support veterans, and ensure fair treatment for workers.

Brown grew up in Steilacoom, WA, and is a graduate of Morehouse College and Harvard Law School. He served as an Army JAG lawyer and was awarded the Bronze Star. Brown previously served as lead counsel for Governor Jay Inslee and as U.S. attorney for the Western District of Washington. Before his election as AG, he worked in the private sector, assisting public, private, and nonprofit clients with complex civil litigation and constitutional issues, including defending landmark gun safety legislation.

Washington AG in the News:

- On December 8, a federal judge [ruled in favor](#) of Brown and a coalition of 18 AGs, vacating the Trump administration's indefinite freeze on offshore and onshore wind project approvals as arbitrary and capricious, thereby protecting states' clean energy commitments and the economic benefits of wind power.
- Following an AG [investigation](#) that found Confluence Health failed to refund hospital patients later approved for charity care, the system has reimbursed more than \$1.8 million with 12% interest, and an agreement filed on December 8 ends the AG probe.
- On December 4, Brown [announced](#) Shinn & Son will pay \$300,000 and provide \$5,000 to \$25,000 to affected workers under a Washington consent decree resolving allegations that it misled jobseekers and discriminated against local and female farmworkers by replacing them with H-2A guest workers and denying equal terms.

UPCOMING AG EVENTS

- **January: AGA | Human Trafficking Training | Virtual**
- **February: RAGA | Virtual Fund Retreat | Big Sky, MT**
- **February: DAGA | Policy Conference | San Francisco, CA**

For more on upcoming AG Events, [click here](#).

Troutman Pepper Locke's State Attorneys General team combines legal acumen and government experience to develop comprehensive, thoughtful strategies for clients. Our attorneys handle individual and multistate AG investigations, proactive counseling and litigation, and manage ancillary regulatory issues. Our successful approach has been recognized by *Chambers USA*, which ranked our practice as a leader in the industry.

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