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E-filing

ORIGINAL  
FILED  
JUL 14 2010  
RICHARD W. WIEKING  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

9 UNITED STATES DISTRICT COURT  
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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13 PEOPLE OF THE STATE OF CALIFORNIA,  
*ex rel.* EDMUND G. BROWN JR.,  
14 ATTORNEY GENERAL,

Case No.

**COMPLAINT FOR DECLARATORY  
AND EQUITABLE RELIEF (UNFAIR  
BUSINESS PRACTICES; VIOLATION  
OF THE NATIONAL  
ENVIRONMENTAL POLICY ACT)**

**(42 U.S.C. §§ 4321 *et seq.*; 28 U.S.C. 2201;  
Cal. Code Civ. Proc. § 1060; Cal. Bus. &  
Prof. Code § 17200 *et seq.*)**

15 Plaintiff,  
16 v.

17 FEDERAL HOUSING FINANCE AGENCY;  
EDWARD DeMARCO, in his capacity as  
Acting Director of FEDERAL HOUSING  
18 FINANCE AGENCY; FEDERAL HOME  
LOAN MORTGAGE CORPORATION;  
19 CHARLES E. HALDEMAN, JR. in his  
capacity as Chief Executive Officer of  
20 FEDERAL HOME LOAN MORTGAGE  
CORPORATION; FEDERAL NATIONAL  
21 MORTGAGE ASSOCIATION; MICHAEL J.  
WILLIAMS, in his capacity as Chief Executive  
22 Officer of FEDERAL NATIONAL  
MORTGAGE ASSOCIATION,  
23

24 Defendants.  
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26 INTRODUCTION

27 1. California has pioneered financing for solar power systems, and energy and water  
28 efficiency retrofits for homeowners. These programs, called Property Assessed Clean Energy