

**UNITED STATES OF AMERICA
BEFORE THE CONSUMER FINANCIAL PROTECTION BUREAU**

In the Matter of:

Interstate Lending, LLC,

Respondent.

**Administrative Proceeding
File No. 2016-CFPB-0018**

MOTION TO AMEND NOTICE OF CHARGES

Pursuant to 12 C.F.R. § 1081.202, Enforcement Counsel respectfully submits this Motion to Amend the Notice of Charges against Respondent Interstate Lending, LLC. In support of this Motion, the Bureau submits as follows:

The Bureau initiated this action against Respondent on September 20, 2016 alleging violations of the Truth in Lending Act (“TILA”) and its implementing regulation, Regulation Z, and the Consumer Financial Protection Act (“CFPA”) based on Respondent’s failure to express a finance charge as an annual percentage rate on its Internet advertisement for its title loan business. The Bureau accomplished service of the Notice of Charges on September 21, 2016. The Court has since granted multiple extensions of time for Interstate to file its Answer to the Notice of Charges so that the Parties could engage in settlement negotiations. During the course of those negotiations, the Bureau learned that the website described in the Notice of Charges, <http://www.interstatelending.net>, was placed online by an advertising company without Respondent’s knowledge or consent. Respondent did, however, have another website, <http://www.greatratetitleloans.com>, that it owned and operated to advertise its title lending business which contained the same TILA and Regulation Z violations.

The Bureau now moves to amend the Notice of Charges to comport with the facts discovered during the course of this litigation. Respondent has consented to amendment of the Notice of Charges in accordance with 12 C.F.R. § 1081.202(a). A copy of the opposing counsel’s written consent to the amendment of the Notice of Charges is attached as Attachment A.

In light of the foregoing, Enforcement Counsel hereby moves for entry of the Proposed Order included as Attachment B.

Respectfully submitted,

 /s/ Rebecca Coleman
Rebecca Coleman
Amanda Krause
Enforcement Attorneys
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552
(202) 435-7544 – Telephone
Rebecca.Coleman@cfpb.gov
Amanda.krause@cfpb.gov

*Attorneys for Consumer Financial
Protection Bureau*

Certificate of Service

I hereby certify that on the 14th day of December 2016, I caused a copy of the foregoing Motion to Amend Notice of Charges, along with all attachments, to be filed by electronic transmission (e-mail) with the Office of Administrative Adjudication (CFPB_electronic_filings@cfpb.gov), Administrative Law Judge Christine L. Kirby, and served by email on the Respondents' counsel at the following addresses:

Allen Denson, Esq.
adenson@hudco.com

Erik M. Kosa, Esq.
ekosa@hudco.com

/s/ Rebecca Coleman
Rebecca Coleman