

MARCH 25, 2026

Civil Penalty Fund and Bureau-Administered Redress Annual Report

Fiscal Year 2025



Message from Lauren Hassouni

Civil Penalty Fund Administrator

I am pleased to present the Consumer Financial Protection Bureau's (CFPB's) Civil Penalty Fund and Bureau-Administered Redress Annual Report for Fiscal Year 2025.

As required by the Civil Penalty Fund rule, the CFPB has prepared this report to describe how funds in the Civil Penalty Fund have been allocated, the basis for those allocations, and how funds that have been allocated to classes of victims have been distributed. Relatedly, this report describes how the CFPB has used the funds it has collected in the Legal or Equitable Relief Fund for the purpose of compensating consumers, referred to as Bureau-Administered Redress.

The CFPB continues to make great progress in providing compensation to consumers who have been harmed by violations of federal consumer financial protection law. During fiscal year 2025, we distributed over \$2 billion to more than 4.5 million consumers. We collected over \$175.7 million in civil penalties from financial institutions, businesses, and individuals for various violations of consumer financial protection laws ordered in fiscal year 2025. We also allocated funds from the Civil Penalty Fund to seven victim classes and expect those funds to be distributed to consumers over the course of the next fiscal year. The Civil Penalty Fund and Bureau-Administered Redress are exclusively used for providing relief to harmed consumers.

Sincerely,

Lauren Hassouni

Lauren Hassouni

Table of contents

Message from Lauren Hassouni	2
Table of contents	3
1. Civil Penalty Fund annual report	4
1.1 Civil Penalty Fund overview	4
1.2 Civil Penalty Fund collections	6
1.3 Allocations from the Civil Penalty Fund.....	7
1.4 Civil Penalty Fund distributions.....	12
2. Bureau-Administered Redress annual report.....	16
2.1 Bureau-Administered Redress collections	16
2.2 Bureau-Administered Redress distributions.....	17

1. Civil Penalty Fund annual report

Section 1055(a) of the Dodd-Frank Act authorizes the CFPB to obtain any appropriate legal or equitable relief for violations of Federal consumer financial laws. That relief may include civil penalties. Section 1017(d) of the Dodd-Frank Act further establishes the Consumer Financial Civil Penalty Fund (Civil Penalty Fund), a victims relief fund, into which the CFPB deposits civil penalties it collects in judicial and administrative actions under Federal consumer financial laws.

Under the Act, funds in the Civil Penalty Fund may be used for payments to the victims of activities for which civil penalties have been imposed under the Federal consumer financial laws. To the extent that such victims cannot be located, or such payments are otherwise not practicable, the CFPB may use funds in the Civil Penalty Fund for the purpose of consumer education and financial literacy programs.

The [Civil Penalty Fund rule](#), 12 C.F.R. part 1075, a final rule governing the CFPB’s use of the funds in the Civil Penalty Fund, requires the CFPB to issue regular reports on the Civil Penalty Fund. Included in this Annual Report is a summary of the Civil Penalty Fund activity since inception through September 30, 2025, a description of Civil Penalty Fund collections in fiscal year 2025, a description of Civil Penalty Fund allocations in fiscal year 2025 and the basis for those allocations, and an overview of the distribution of those funds.

Additional background information on the Civil Penalty Fund can be found at:

<https://www.consumerfinance.gov/about-us/payments-harmed-consumers/>

1.1 Civil Penalty Fund overview

As of September 30, 2025, the Civil Penalty Fund had an available balance of \$47.3 million in funds that have been collected and are not otherwise allocated or set aside for administrative purposes. Table 1 below summarizes significant activity of the fund from inception through September 30, 2025:

TABLE 1: CIVIL PENALTY FUND SIGNIFICANT ACTIVITY

Cumulative Activity Through 9/30/2025	Amount
Civil Penalties Collected	\$3,753,429,515
(Minus) Collected Funds Unavailable due to Appeal	(\$14,998,287)

Cumulative Activity Through 9/30/2025	Amount
(Minus) Funds Set Aside for Administrative Purposes	(\$61,573,322)
(Minus) Funds Allocated for Victim Compensation	(\$3,794,213,242)
(Plus) Victim Compensation Funds Unallocated and Returned to the Fund	\$182,408,343
(Minus) Funds Allocated for Consumer Education and Financial Literacy Programs	(\$28,812,809)
(Plus) Consumer Education and Financial Literacy Programming Funds Unallocated and Returned to the Fund	\$11,040,090
(Total) Civil Penalty Fund Balance Available for Allocation¹	\$47,280,288

TABLE 2: FISCAL YEAR 2025 ACTIVITY SUMMARY²

Activity 10/1/2024 – 9/30/2025	Amount
Civil Penalties Collected	\$175,731,046
Collected Funds Unavailable due to Appeal	\$4,170,085
Funds Set Aside for Administrative Purposes	\$5,000,000
Funds Allocated for Victim Compensation	\$260,774,803
Victim Compensation Funds Unallocated and Returned to the Fund	\$33,422,171
Funds Allocated for Consumer Education and Financial Literacy Programs	\$0
Consumer Education and Financial Literacy Programming Funds Unallocated and Returned to the Fund	\$0

¹ The total includes \$10,016,670 that was subject to sequestration in fiscal year 2025. These funds were not available for allocation in fiscal year 2025 but will be available to the CFPB in fiscal year 2026.

² Amounts found in Cumulative Activity Through 9/30/2025 (Table 1) are inclusive of the Fiscal Year 2025 Activity Summary figures found in Table 2.

1.2 Civil Penalty Fund collections

TABLE 3: FISCAL YEAR 2025 COLLECTIONS

Defendant Name	Civil Penalty Collected	Collection Date
Northern Resolution Group, LLC, et al. –MacKinnon Defendants	\$508,809	October 10, 2024 September 9, 2025
Driver Loan, LLC, and Angelo Jose Sarjeant	\$100,000	October 10, 2024
Ejudicate, Inc., d/b/a Brief	\$1	October 18, 2024
Pennsylvania Higher Education Assistance Agency, et al. – Defendant Pennsylvania Higher Education Assistance Agency	\$1,750,000	October 31, 2024
Apple Inc.	\$25,000,000	November 1, 2024
Goldman Sachs Bank USA	\$45,000,000	November 4, 2024
Daniel A. Rosen Inc., d/b/a Credit Repair Cloud, et al. – Defendant Rosen	\$1,500,000	November 6, 2024
VyStar Credit Union	\$1,500,000	November 12, 2024
Navy Federal Credit Union	\$15,000,000	November 15, 2024
Consumer Advocacy Center Inc., d/b/a Premier Student Loan Center, et al. – Defendant Kaine Wen	\$2,018,085	November 22, 2024 January 10, 2025 February 4, 2025
Global Tel Link Corporation d/b/a ViaPath Technologies, et al.	\$1,000,000	November 22, 2024 January 13, 2025
Pennsylvania Higher Education Assistance Agency, et al. – NCSLT Defendants	\$400,000	November 25, 2024 December 26, 2024 March 18, 2025 March 25, 2025
Townstone Financial, Inc.	\$105,000	December 5, 2024
Fairway Independent Mortgage Corporation	\$1,900,000	December 13, 2024
Performant Recovery, Inc.	\$700,000	December 16, 2024
Climb Credit, Inc., et al.	\$950,000	December 16, 2024

Universal Debt & Payment Solutions, LLC, et al. – Defendants Marcus Brown, Sarita Brown, and WNY Account Solutions, LLC	\$252,196	December 17, 2024
Judith Noh d/b/a Student Loan Pro, et al.	\$2,000	January 7, 2025
Block, Inc.	\$55,000,000	January 21, 2025
Equifax Inc. and Equifax Information Services LLC	\$15,000,000	January 24, 2025
American Honda Finance Corp.	\$2,500,000	January 24, 2025
Draper & Kramer Mortgage Corporation	\$1,500,000	January 30, 2025
Wise US Inc.	\$44,955	May 16, 2025
FirstCash, Inc., et al.	\$4,000,000	July 21, 2025
Total	\$175,731,046	

In fiscal year 2025, the CFPB collected civil penalties totaling \$175.7 million from 24 defendants.

1.3 Allocations from the Civil Penalty Fund

Under the Civil Penalty Fund rule, the Civil Penalty Fund Administrator allocates funds in the Civil Penalty Fund to classes of victims of violations for which civil penalties have been imposed under the Federal consumer financial laws and, to the extent that such victims cannot be located or such payments are otherwise not practicable, to consumer education and financial literacy programs. The Fund Administrator makes these allocations according to a schedule published in accordance with the rule. That schedule established six-month periods and provides that an allocation will be made within 60 days of the end of each period. The Fund Administrator may allocate only those funds that were available as of the end of the six-month period and may allocate funds to a class of victims only if that class had uncompensated harm as of the end of the six-month period.

Allocations in fiscal year 2025

Period 24: April 1, 2024 – September 30, 2024

On November 29, 2024, the CFPB made its twenty-fourth allocation from the Civil Penalty Fund. As of September 30, 2024, the Civil Penalty Fund contained an available unallocated balance of \$108,071,959.³ This amount was available for allocation.

TABLE 4: PERIOD 24: CASES IN WHICH A CIVIL PENALTY WAS IMPOSED

Defendant Name	Date of Final Order⁴
BloomTech Inc., and Austen Allred	April 17, 2024
Chime Financial, Inc.	May 7, 2024
Western Benefits Group, LLC	May 20, 2024
Sutherland Global Services, Inc., Sutherland Mortgage Services, Inc., and Sutherland Government Solutions, Inc.	June 18, 2024
NOVAD Management Consulting, LLC	June 18, 2024
Freedom Mortgage Corporation	June 26, 2024
Fifth Third Bank, N.A. (Force-Placed Insurance matter)	July 9, 2024
Fifth Third Bank, N.A. (Sales Practices matter)	July 18, 2024
Daniel A. Rosen, Inc., d/b/a Credit Repair Cloud, et al.	August 12, 2024
Fay Servicing, LLC	August 21, 2024
New Day Financial, LLC	August 29, 2024
TD Bank, N.A.	September 11, 2024
Navient Corporation, et al.	September 12, 2024

³ The unallocated balance amount does not include \$10,828,202 in funds that were collected pursuant to three orders that are currently pending appeal and are thus not yet “final orders” as defined in 12 C.F.R. § 1075.101. Those funds are therefore not available for allocation under 12 C.F.R. § 1075.105(c). The amount includes \$9,687,419 that was sequestered during 2024 and became available to the CFPB in fiscal year 2025.

⁴ The Civil Penalty Fund rule defines the term “final order” as a consent order or settlement issued by a court or by the CFPB, or an appealable order issued by a court or by the CFPB as to which the time for filing an appeal has expired and no appeals are pending.

Civil penalties were imposed in 13 cases with final orders from Period 24. Of those 13 cases, BloomTech Inc. and Western Benefits Group received an allocation this period. Victims in one prior period matter, Lexington Law (class A), received an allocation this period.

The allocations for each case are as follows:

- The BloomTech Inc., et al. case received an allocation of \$58,075,875 from the Civil Penalty Fund. The class of victims receiving an allocation are consumers who entered into income sharing agreements with the defendants between January 1, 2017, and March 31, 2024 and made unrefunded payments on those income sharing agreements between January 1, 2017 and April 17, 2024.
- The Western Benefits Group case received an allocation of \$974,590 from the Civil Penalty Fund. The class of victims receiving an allocation are consumers who paid advance fees to the defendant between January 1, 2016 and May 20, 2024.
- The Lexington Law case (class A) received an allocation of \$49,021,494. The class of victims receiving this allocation are certain consumers who purchased the defendants' credit repair services from March 8, 2016 through August 30, 2023.

The Fund Administrator exercised discretion and deferred an allocation to a class of consumers in one prior-period matter, Integrity Advance, et al. In the Integrity Advance case, the victim allocation is deferred while the CFPB pursues additional consumer level data. This case will be reviewed as part of the Period 25 allocation.

Additionally, a review of the OneMain case, which had been deferred for allocation in prior periods, has been completed. Consumers in this matter will not receive an allocation from the Civil Penalty Fund.⁵

As of the time of this allocation, Lexington Law (class A) was the only prior-period victim class with uncompensated harm that is compensable from the Civil Penalty Fund. This class received allocations totaling \$1,830,430,214 in Periods 22-23 and after this allocation, the remaining uncompensated harm associated with this victim class is \$762,426,273. If sufficient funds are available in future periods, these victims may receive additional allocations to provide full compensation up to 100% of their harm.

No funds were available for allocation for Consumer Education and Financial Literacy purposes.

⁵ Due to data limitations it will not be practicable to compensate consumers in this matter.

The total allocation for Period 24 was \$108,071,959.

TABLE 5: PERIOD 24 ALLOCATION SUMMARY

Case Name	Allocation Amount
Bloomtech Inc.	\$58,075,875
Western Benefits Group	\$974,590
Lexington Law – Class A	\$49,021,494
Total	\$108,071,959

Period 25: October 1, 2024 – March 31, 2025

On May 30, 2025, the CFPB made its twenty-fifth allocation from the Civil Penalty Fund. As of March 31, 2025, the Civil Penalty Fund contained an available unallocated balance of \$157,702,844.⁶ The Fund Administrator set aside \$5,000,000 to cover administrative expenses associated with distributing funds to harmed consumers, reducing the amount available for allocation to \$152,702,844.

TABLE 6: PERIOD 25: CASES IN WHICH A CIVIL PENALTY WAS IMPOSED

Defendant Name	Date of Final Order
Ejudicate, Inc., d/b/a Brief	October 10, 2024
Goldman Sachs Bank USA	October 23, 2024
Apple Inc.	October 23, 2024
VyStar Credit Union	October 31, 2024
Navy Federal Credit Union	November 7, 2024
Townstone Financial, Inc.	November 7, 2024
Global Tel Link Corporation d/b/a ViaPath Technologies, et al.	November 14, 2024

⁶ The unallocated balance amount does not include \$15,103,286 in funds that were collected pursuant to five orders that are currently pending appeal and are thus not yet “final orders” as defined in 12 C.F.R. § 1075.101 and one order under review for adjustment. The amount excludes \$9,532,409 that was sequestered during 2025 and will become available to the CFPB in fiscal year 2026.

Defendant Name	Date of Final Order
Fairway Independent Mortgage Corporation	December 3, 2024
Climb Credit, Inc., et al.	December 6, 2024
Performant Recovery, Inc.	December 9, 2024
USASF Servicing, LLC	December 26, 2024
Block, Inc.	January 16, 2025
Equifax Inc. and Equifax Information Services LLC	January 17, 2025
American Honda Finance Corp.	January 17, 2025
Draper & Kramer Mortgage Corporation	January 24, 2025
Wise US Inc.	January 30, 2025

Civil penalties were imposed in 16 cases with final orders in Period 25. Of those 16 cases, USASF Servicing, LLC, Climb Credit, Inc., and Performant Recovery, Inc. received an allocation this period. Victims in two prior period matters, Integrity Advance, et al., and Lexington Law (class A), also received an allocation this period.

The allocations for each case are as follows:

- The USASF Servicing, LLC case received an allocation of \$32,627,689. The classes of victims receiving an allocation are certain consumers who: (1) wrongfully had their starter-interrupter devices activated; (2) failed to receive earned insurance refunds; (3) were double charged for collateral-protection insurance; (4) received misapplied consumer payments; and/or (5) had their vehicles wrongfully repossessed.
- The Climb Credit case received an allocation of \$6,618,000 from the Civil Penalty Fund. The class of victims receiving an allocation are consumers who took out a Climb Loan containing an origination fee between January 2014 and November 2019.
- The Performant case received an allocation of \$14,046,207. The class of victims receiving an allocation are certain consumers who defaulted on certain Federal loans between July 2015 and March 13, 2020, contacted the defendant and completed rehabilitation within certain timeframes, and incurred collection costs on a rehabilitated loan.

- The Integrity Advance case received an allocation of \$31,373,759 from the Civil Penalty Fund. The class of victims receiving an allocation are certain consumers who entered into loan agreements with the defendants between July 21, 2011 and December 1, 2012.
- The Lexington Law case (class A) received an allocation of \$68,037,189. The class of victims receiving this allocation are certain consumers who purchased the defendants' credit repair services from March 8, 2016 through August 30, 2023.

As of the time of this allocation, Lexington Law (class A) was the only prior-period victim class with uncompensated harm that is compensable from the Civil Penalty Fund. This class received allocations totaling \$1,879,451,708 in Periods 22-24 and after this allocation, the remaining uncompensated harm associated with this victim class is \$694,389,084. If sufficient funds are available in future periods, these victims may receive additional allocations to provide full compensation up to 100% of their harm.

No funds were available for allocation for Consumer Education and Financial Literacy purposes.

The total allocation for Period 25 was \$152,702,844.

TABLE 7: PERIOD 25 ALLOCATION SUMMARY

Case Name	Allocation Amount
USASF Servicing, LLC.	\$32,627,689
Climb Credit	\$6,618,000
Performant Recovery, Inc.	\$14,046,207
Integrity Advance, et al	\$31,373,759
Lexington Law - Class A	\$68,037,189
Total	\$152,702,844

1.4 Civil Penalty Fund distributions

In fiscal year 2025, Civil Penalty Fund distributions totaling \$2.06 billion began for seven victim classes.

TABLE 8: CIVIL PENALTY FUND DISTRIBUTIONS INITIATED IN FISCAL YEAR 2025

Defendant	Period	Amount Allocated	Amount Distributed	Number of Payments Made	Year & Quarter of Initial Distribution
Tempoe, LLC	22	\$192,259,616	\$191,909,382	263,703	FY25 Q1
Lexington Law (Class A)	22-25	\$1,947,488,897	\$1,830,430,214	4,205,877	FY25 Q1
Lexington Law (Class B)	22	\$19,000,000	\$19,000,000	108,044	FY25 Q2
Driver Loan, LLC	22	\$2,863,648	\$1,753,262	93	FY25 Q2
Access Funding, et al.	19	\$28,409,957	\$12,203,566 ⁷	93	FY25 Q2
Prehired, LLC, et al.	23	\$4,248,249	\$4,197,842	645	FY25 Q3
BounceBack, Inc.	20	\$1,481,773	\$560,671	2,612	FY25 Q4
Total		\$2,195,752,140	\$2,060,054,937	4,581,067	

The table above identifies cases for which distributions of Civil Penalty Fund monies to harmed consumers began in fiscal year 2025. It reflects the period(s) in which an allocation was made to victims in the case, the total amount allocated, the total dollar amount that has been mailed to harmed consumers, the number of consumers to whom initial payments were made, and when distributions began. More information about active distributions is available at <https://www.consumerfinance.gov/about-us/payments-harmed-consumers/>.

Additional funds were also sent to consumers in the Vets Lending matter, for which the distribution was initiated in the first quarter of fiscal year 2024. Specifically, \$671,050 was distributed to consumers in the third quarter of fiscal year 2025 and an additional \$165,313 was distributed to consumers in the fourth quarter of fiscal year 2025. This brings total distributions in the Vets Lending matter through the end of fiscal year 2025 to \$5,962,626.

Funds were also distributed to consumers in U.S. Equity Advantage, Inc. and SMART Payment Plan, LLC, two cases in which distributions concluded in fiscal year 2024. In both cases, unclaimed funds were redistributed to eligible consumers. Specifically, \$1,082,599 was

⁷ CFPB transferred \$28,409,957 to the third party administrator in fiscal year 2025 to be distributed to approved eligible consumers as they confirm their payment details. The “Amount Distributed” in the table represents the total payments made through the end of the fiscal year.

distributed to consumers in the U.S. Equity Advantage case and \$596,731 was distributed to consumers in the SMART Payment Plan case.

Distributions are expected to begin in fiscal year 2026 for the Edmiston Marketing, LLC, d/b/a Easy Military Travel; Hello Digit, LLC; Future Income Payments, LLC, et al.; BloomTech Inc.; Western Benefits Group, LLC; Integrity Advance, et al.; USASF Servicing, LLC; Climb Credit, Inc., et al.; and Performant Recovery, Inc. cases.

Civil Penalty Fund distributions concluded for six cases in fiscal year 2025.

TABLE 9: CIVIL PENALTY FUND DISTRIBUTIONS CONCLUDED IN FISCAL YEAR 2025

Defendant	Amount Allocated	Amount Distributed	Number of Payments Made	Percent of Distributed Funds Claimed	Year & Quarter of Distribution Conclusion
Commercial Credit Consultants, et al.	\$30,650,002	\$15,241,879	37,313	63%	FY25 Q1
Prime Marketing Holdings, LLC	\$20,600,441	\$13,635,816	32,125	46%	FY25 Q1
Siringoringo	\$20,825,000	\$2,329,622	718	99%	FY25 Q2
Certified Forensic Loan Auditors, LLC, et al.	\$3,000,000	\$174,417	108	99%	FY25 Q2
Frank Ronald Gebase, Jr.	\$240,995	\$240,994	845	61%	FY25 Q3
Federal Debt Assistance Association, LLC, et al.	\$4,972,389	\$4,182,348	618	85%	FY25 Q4
Total	\$80,288,827	\$35,805,076	71,727		

The table above reflects the cases where a distribution concluded in fiscal year 2025. For each case, it displays the amount allocated from the Civil Penalty Fund, the total dollar amount that was sent to harmed consumers, the number of consumers to whom payments were made, the percent of the distributed funds that were claimed, and when the distribution concluded.

In fiscal year 2025, the CFPB distributed \$16,763.69 in direct payments to consumers in the Omni Financial case. The distribution to consumers by the CFPB's third-party administrator in this case concluded and unclaimed funds were returned to the CFPB. The CFPB subsequently made direct payments to victims who requested reissued payments.

2. Bureau-Administered Redress annual report

Dodd-Frank Act Section 1055 authorizes a court in a judicial action, or the CFPB in an administrative proceeding, to grant any appropriate legal or equitable relief for a violation of Federal consumer financial law. Such relief may include redress for victims of the violations, including refunds, restitution, and damages. Relief that is intended to compensate victims is treated as fiduciary funds and deposited into the “Legal or Equitable Relief Fund” established at the Department of the Treasury. The CFPB refers to these collections as Bureau-Administered Redress.

2.1 Bureau-Administered Redress collections

TABLE 10: BUREAU-ADMINISTERED REDRESS COLLECTIONS IN FISCAL YEAR 2025

Defendant	Amount Collected	Date of Collection
Progrexion Marketing, Inc., et al.	\$50,000	October 17, 2024
Driver Loan, LLC, and Angelo Jose Sarjeant	\$20,895	October 29, 2024
James R. Carnes, et al.	\$5,092,166	January 21, 2025 February 4, 2025
Consumer Advocacy Center, Inc., d/b/a Premier Student Loan Center, et al. – Defendant Consumer Advocacy Center, Inc.	\$88,712	March 27, 2025
Orion Processing, LLC, et al. – Defendants Derin Scott, David Klein, and Relief Defendant Shannon Scott	\$810	May 13, 2025
Total	\$5,252,583	

In fiscal year 2025, the CFPB collected \$5.3 million in Bureau-Administered Redress funds from five defendants. Funds are distributed in accordance with the terms of the final order for the case.

2.2 Bureau-Administered Redress distributions

In fiscal year 2025, distributions of Bureau-Administered Redress began for two cases.

TABLE 11: BUREAU-ADMINISTERED REDRESS DISBURSEMENTS INITIATED IN FISCAL YEAR 2025

Defendant	Year & Quarter of Initial Distribution	Amount Distributed	Number of Payments Made
Lexington Law (Class A)	FY25 Q2	\$50,000	6
Universal Debt & Payment Solutions, LLC, et al.	FY25 Q3	\$11,505	60
Total		\$61,505	66

The table above reflects matters for which redress funds were collected, the time period when distributions began, the total dollar amount that has been sent to harmed consumers, and the number of consumers to whom payments were made. More information about active distributions is available at <https://www.consumerfinance.gov/about-us/payments-harmed-consumers/>.

There were no Bureau-Administered Redress distributions that concluded in fiscal year 2025.

In fiscal year 2025, the CFPB distributed \$20,809 in direct payments to consumers in the Premier Student Loan Center, et al. case. The distributions to consumers by the CFPB's third-party administrator in this case concluded in fiscal year 2024 and unclaimed funds were returned to the CFPB. The CFPB subsequently made direct payments to victims who requested reissued payments.

Funds were also distributed to consumers in U.S. Equity Advantage, Inc. and SMART Payment Plan, LLC, two cases in which distributions concluded in fiscal year 2024. In both cases, unclaimed funds were redistributed to eligible consumers. Specifically, \$129,729 was distributed to consumers in the U.S. Equity Advantage case and \$174,178 was distributed to consumers in the SMART Payment Plan case.