

Semi-Annual Report of the Consumer Financial Protection Bureau

Message from Acting Director Paoletta

This Report covers the remaining six months of the Bureau's work under the tenure of then-Acting Director R. Vought, who set the Bureau on a transformative path, reversing abuses and overreach of its statutory mandates under the former Director Chopra. During this period, we have continued to advance our President's priorities, promoting policies benefiting consumers.

This leadership is committed to fixing the Bureau's broken consumer complaint system. The Bureau ceased publication of unverified complaint narratives and visualizations since the utility of such publication is minimal, causing confusion among consumers and needlessly harming companies' reputations. The Bureau aligned its complaint process with the requirements of the Fair Credit Reporting Act by directing consumers to dispute with consumer reporting agencies first before submitting complaints. The Bureau also published an updated Company Portal Manual to set clear and consistent response expectations across industries and companies. Finally, the Bureau enhanced the system's identity protections by requiring two-factor authentication.

The Bureau has continued to implement its robust deregulatory agenda by finalizing two fair lending rulemakings. First, the CFPB advanced the President's priorities by issuing a final rule amending Regulation B (Reg B) of the Equal Credit Opportunity Act (ECOA) to affirm that, as a statutory and constitutional matter, ECOA does not authorize disparate impact liability. The amended rule also prohibits use of race, color, national origin, or sex as eligibility criteria for Special Purpose Credit Programs. The second rulemaking amended Reg B provisions implementing Section 1071 of the Dodd-Frank Act to refocus the rule's coverage of credit transactions and financial institutions and remove data collection requirements that were not in the statute, such as LGBTQIA+-owned business status and use of disaggregated categories in collecting race and ethnicity data points.

This leadership has continued to ensure that our enforcement work is clearly within the CFPB's statutory authority and aligned with this administration's priorities. We adopted new [Enforcement Principles](#) focusing on addressing actual consumer harm; ensuring enforcement actions comport with due process; collaborating with institutions to address issues voluntarily and remedy consumer harm quickly; and operating efficiently by refraining from duplicative enforcement work. This new approach resulted in promptly securing over \$250,000 in consumer redress for over 2,000 consumers who were affected by Bilt's transition to a new bank partner. Instead of initiating a protracted investigation and a public enforcement action that would have left harmed consumers waiting for years without any relief, CFPB leadership engaged with Bilt collaboratively and directly. The Bureau also has continued only matters that align with our priorities, and obtained favorable results for consumers, especially service members and their families and veterans.

The CFPB executed a new exam schedule consistent with its supervision priorities, focusing on depository institutions, actual consumer fraud, and areas clearly within the CFPB's statutory authority. Supervision is no longer relying on novel legal theories, nor duplicating similar federal or state oversight. Exams are governed by the [Humility in Supervision Pledge](#), which outlines how examiners conduct supervisory work, such as ascertaining compliance of clearly identified product lines, directly tied to the governing statutory and regulatory regime. The exams focus on conciliation, correction, and remediation of consumer harm.

Table of contents

Message from Acting Director Paoletta	1
Table of contents	2
Overview	4
1. Consumer complaints and financial education	5
1.1 CFPB’s efficient and effective handling of consumer complaints	5
1.2 Improvements to Bureau complaint portal and publications	6
1.3 Improving financial literacy	8
2. Fair lending	10
2.1 Fair lending priorities	10
2.2 Fair lending supervision and enforcement	12
2.3 Fair lending rulemakings & guidance	12
2.4 Fair lending outreach and education	15
3. Supervisory activity	16
4. Enforcement actions	20
4.1 Resolved actions aligned with new priorities, including protecting servicemembers	22
4.2 Actions withdrawn or dismissed	27
4.3 Final orders terminated	28
4.4 Ongoing actions aligning with new priorities	33
5. Rules, orders, and significant initiatives	37
5.1 Significant rules and guidance adopted and proposed	37
5.2 Significant initiatives, and reports adopted	45
5.3 Upcoming plan for rules, orders, and other initiatives	54
6. State consumer financial law	56

7. Marketplace challenges	61
8. Fair workforce and business opportunities	62
8.1 Increasing workforce fairness	62
8.2 Increasing contracting opportunities	62
9. Budget justification.....	64
9.1 CFPB spending through the end of the third quarter of the Fiscal Year.....	64
9.2 Fund transfers received from the Federal Reserve System.....	65
Appendix A: 2025 Annual Report to Congress on the Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act)	66
Appendix B: Annual Report on the Truth in Lending Act, the Electronic Fund Transfer Act, and the Credit Card Accountability Responsibility and Disclosure Act.....	68

Overview

This report is required by the Dodd-Frank Wall Street Reform and Consumer Protection Act (2010), 12 U.S.C. § 5496. The statute enumerates nine elements for inclusion in the Consumer Financial Protection Bureau's (CFPB or Bureau) reports to Congress. This Semi-Annual Report meets this mandate, with the report sections addressing all of the required elements.

Initiatives described in this Semi-Annual Report generally occurred between **January 1, 2026 – June 30, 2026, except where otherwise noted.**

The Truth in Lending Act (TILA)¹ and the Electronic Fund Transfer Act (EFTA)² require the Bureau to make an annual report to Congress that includes a description of the administration of functions under TILA and EFTA, and an assessment of the extent to which compliance with TILA and EFTA has been achieved. In addition, the Credit Card Accountability Responsibility and Disclosure Act (CARD Act)³ requires reporting on supervisory and enforcement activities with respect to compliance by credit card issuers with applicable federal consumer protection statutes and regulations.⁴ **This report also provides the information required by TILA, EFTA, and the CARD Act for the period January 1, 2024–December 31, 2025.**

The Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act) requires the Bureau to submit an annual report to Congress on the effectiveness of the SAFE Act's provisions.⁵ **This report also provides the information required by the SAFE Act for 2025.**

¹ 15 U.S.C. § 1613.

² 15 U.S.C. § 1613.

³ 15 U.S.C. § 1616(e).

⁴ In 2012, the Federal Reserve Board (Board) and the CFPB agreed that responsibility for the reporting period required by the CARD Act passed to the CFPB under the terms of the Consumer Financial Protection Act of 2010.

⁵ 12 U.S.C. § 5115(a).

1. Consumer complaints and financial education

1.1 CFPB's efficient and effective handling of consumer complaints

From July 1, 2025, to June 30, 2026, the CFPB received approximately 8,268,100 consumer complaints.⁶ Despite the challenges posed by users who are misusing the complaint process, the CFPB has continued to process complaints efficiently by delivering timely responses to consumers. Consumers submitted approximately 99.3 percent of these complaints through the CFPB's website. Complaints submitted via telephone, mail, and referral from other state and federal agencies accounted for less than one percent of complaints.

The CFPB sent approximately 7,501,400 complaints received to companies for review and response.⁷ Companies responded to approximately 99.6 percent of complaints that the CFPB sent to them for response during the reporting period. Company responses typically include descriptions of steps taken or that will be taken in response to the consumer's complaint, communications received from the consumer, any follow-up actions or planned follow-up actions, and a categorization of the company's response. Companies' responses also describe a range of monetary and non-monetary relief. Examples of non-monetary relief include correcting inaccurate data provided or reported in consumers' credit reports, stopping unwanted calls from debt collectors, correcting account information, issuing corrected documents, restoring account access, and addressing formerly unmet customer service issues.

When consumers submit complaints, the CFPB's complaint form prompts them to select the consumer financial product or service with which they have a problem as well as the type of problem they are having with that product or service. The CFPB uses these consumer selections to group the financial products and services about which consumers complain to the CFPB for public reports.

The CFPB's Office of Consumer Response analyzes consumer complaints, company responses, and consumer feedback to assess the accuracy, completeness, and timeliness of company

⁶ Complaint data in this report are current as of September 1, 2026. Percentages in this section of the report may not sum to 100 percent due to rounding. This analysis excludes multiple complaints submitted by a given consumer on the same issue and whistleblower tips.

⁷ The CFPB found 7 percent of the complaints it received to be not actionable and referred 2 percent of the complaints it received to other regulatory agencies. Complaints that are not actionable include incomplete submissions, withdrawn complaints, and complaints in which the CFPB discontinued processing because it had reason to believe that a submitter did not disclose its involvement in the complaint process. At the end of this period, 0.05 percent of complaints were pending with the consumer and less than 0.01 percent of complaints were pending with the CFPB.

responses. The Office of Consumer Response uses a variety of approaches to identify trends and possible consumer harm. Examples include:

- Reviewing cohorts of complaints and company responses to assess the accuracy, timeliness, and completeness of individual company’s responses;
- Conducting text analytics to understand emerging trends in complaints; and
- Building robust statistical models to understand how company approaches to responding to complaints are changing.

The CFPB publishes periodic reports about its complaint analyses. For example, in March 2026, it published the *Consumer Response Annual Report*, which is required by 12 U.S.C. § 5493(b)(3)(C).⁸

Finally, the CFPB also shares consumer complaint information with prudential regulators, the Federal Trade Commission (FTC), other federal agencies, and state agencies.

1.2 Improvements to Bureau complaint portal and publications

The consumer complaint portal has long been plagued by issues that severely limit its effectiveness in addressing consumers’ complaints and practical utility of its information. During the reporting period, the CFPB took multiple concrete actions to address these issues and is continuing its work, including with Credit Reporting Agencies (CRAs), to increase effectiveness of the process, while aligning it with the statutory authorities.⁹ These actions include:

- *Added a credit and consumer reporting complaint notice.* The CFPB is committed to meeting its statutory obligations under the Fair Credit Reporting Act (FCRA). In February 2026, the CFPB added a notice to emphasize consumers must first exhaust their dispute rights directly with CRAs before submitting a complaint. Users attest that they submitted their dispute and that either 45 days have elapsed or the dispute is no longer pending with the CRA before beginning a complaint.
- *Increased clarity of closure definitions to promote consistency.* Through its outreach to CRAs and other companies, the CFPB learned that companies operationalized the closure definitions differently with some companies using different definitions to categorize a complaint “Closed with non-monetary relief.” To remedy this problem, the CFPB issued a new Company Portal Manual that provides clear information on how companies should

⁸ See Consumer Fin. Prot. Bureau, *Consumer Response Annual Report* (May 2025), <https://www.consumerfinance.gov/data-research/research-reports/2024-consumer-response-annual-report/>.

⁹ See Press Release, Consumer Fin. Prot. Bureau, The CFPB is Correcting Flaws to Restore Integrity and Utility to the Consumer Complaint System (Jun. 24, 2026), <https://www.consumerfinance.gov/about-us/newsroom/the-cfpb-is-correcting-flaws-to-restore-integrity-and-utility-to-the-consumer-complaint-system/>.

use the various substantive and administrative response closure categories. The CFPB continues to work with CRAs to ensure data are consistent across them, and response rates are appropriately high.

- *Enhanced identity protections.* It has long been clear to the CFPB and companies that an increasing number of complaints are being submitted by unauthorized third parties. To remedy this problem, the CFPB launched two-factor authentication, requiring users who create online accounts to verify both their email address and mobile phone number. It also added clarifying text and new relationship categories to emphasize that third parties must disclose their involvement in the complaint process and created support materials so adult children of aging parents, spouses of servicemembers, and other authorized representatives know how to submit complaints. These actions ensure that companies have high-quality information about who submitted a complaint and who will receive their response.
- *Prioritizing complaints that warrant a substantive response.* When companies have reason not to respond to a complaint, the CFPB gives them the ability to return complaints with an administrative response. Through its outreach, the CFPB learned that companies used administrative response options differently. To ensure consistency in complaint responses and outcomes, the CFPB provided greater specificity of when to use existing administrative response categories in the new Company Portal Manual. The CFPB is also developing additional administrative response categories, such as when a user appears to be misusing the complaint process.
- *Increased the efficiency of the complaint process.* The CFPB is committed to leveraging technology to deliver faster, more secure services. Companies have long expressed a desire for an Application Programming Interface (API) to respond more efficiently to complaints. The CFPB launched an API pilot and will also be using software, like an address validation tool, to provide companies with additional high-quality information.
- *Published educational materials on credit reporting.* Some credit repair companies make claims that are too good to be true, such as guaranteeing a specific increase in credit scores or removing negative (but accurate) information. Social media financial influencers and new artificial intelligence (AI) tools are also quickly changing the landscape. The CFPB continued its work to develop and provide high-quality educational resources and tools for consumers, including materials highlighting the costs and risks of credit repair and how to spot fraud and scams. Additionally, the CFPB also began optimizing its content for AI.

The CFPB's work with the complaint process is continuing. The CFPB is working with nationwide CRAs to understand what information can help them more readily identify and review prior disputes and what review period is appropriate. The CFPB is also monitoring the

effect these changes are having on consumer behavior and collecting feedback from companies, including the CRAs.

In addition to complaint portal changes, the CFPB took steps to cease publication of unverified complaint narratives and visualizations.¹⁰ The CFPB has long acknowledged that the publication of unverified complaint narratives and associated data visualizations is entirely discretionary. Many years of experience have demonstrated that the utility of such publication is minimal, while often causing confusion. By their very nature, complaint narratives reflect negative consumer experiences and present only one side of an issue. Ceasing complaint narrative publication aligns the CFPB's operations with its statutory authorities and mitigates the risks to consumers and companies of publishing confusing or misleading information.

1.3 Improving financial literacy

The CFPB is advancing the Trump Administration's expansive efforts to improve financial literacy and increase early access to financial empowerment opportunities.¹¹ The CFPB's financial education products have been accessed more than 11 million times, and it is exploring additional data-driven approaches for the application of super intelligence (SI) tools to optimize access and delivery of CFPB educational resources. These efforts are already paying dividends as citizens turn to [America.gov](https://www.america.gov) and access many of the Bureau's unbiased, objective resources through a single point of entry to the federal government.

The CFPB is continuing to develop targeted educational materials about fraud and scams and other topics that are important to Americans and is working to reach critical groups such as servicemembers, veterans, older Americans, and young adults, who would benefit the most by increased access to financial literacy resources. The CFPB recognizes that government alone cannot solve the threat posed by fraud and scams. The CFPB is encouraged by recent educational campaigns from industry, such as the American Bankers Association's [#BanksNeverAskThat](https://www.abanet.org/campaigns/banks-never-ask-that) and [#PracticeSafeChecks](https://www.practicesafechecks.com) campaigns, which aim to fight scams and combat check fraud. Efforts to empower consumers will help American families and strengthen the overall economy.

One of the CFPB's financial education priorities is youth. The CFPB's youth financial education strategy is a research-based framework that outlines when and how children and youth acquire the knowledge, skills, and behaviors associated with adult financial well-being. The framework

¹⁰ Press Release, Consumer Fin. Prot. Bureau, *The CFPB to Cease Discretionary Publication of Complaint Narratives and Visualizations* (Aug. 14, 2026), <https://www.consumerfinance.gov/about-us/newsroom/the-cfpb-to-cease-discretionary-publication-of-complaint-narratives-and-visualizations/> (discussing the implementation of changes developed during the reporting period).

¹¹ See, e.g., Consumer Fin. Prot. Bureau, *Financial Literacy Annual Report* (May 2026), https://files.consumerfinance.gov/f/documents/cfpb_flar-2025-report_2026-05.pdf. See also Deputy Director Mark Paoletta, *Remarks to the Financial Literacy and Education Commission* (Jul. 27, 2026), <https://www.consumerfinance.gov/about-us/newsroom/deputy-director-mark-paolettas-remarks-to-the-financial-literacy-and-education-commission/>.

supports improving executive functioning skills, creating and encouraging positive financial habits, and building financial knowledge and decision-making skills, which are the three building blocks children develop in youth. As part of this work, the CFPB updated the *Money as Your Grow Bookshelf for Parents and Caregivers*.¹²

The CFPB supported the implementation of Trump accounts through public engagement, consumer education, and integration with federal financial education resources and programming. It is also working on resources to teach how investing early is a wise strategy for reaching financial goals. The CFPB's research shows that providing actionable, relevant, and timely information connected to a financial product or decision is one of the most effective ways to improve financial well-being. People are more likely to absorb information if it is connected to a decision that matters to them, at the time when they can put it to use. Trump accounts provide an opportunity for youth to learn about investing and watch their money grow over time.

Finally, the Vice Chairman of the Financial Literacy and Education Commission (FLEC) is the Acting Director of the CFPB. The CFPB worked with the FLEC to advance the administration's goals to promote financial literacy and education. This work ultimately resulted in a new [U.S. National Strategy for Financial Literacy](#) that will guide nationwide actions on building youth financial competency, developing good saving and investing habits, improving Americans' knowledge of digital financial literacy, and learning how to avoid fraud and scams.¹³

¹² See, e.g., Consumer Fin. Prot. Bureau, *Money as You Grow Bookshelf for Parents and Caregivers* (Jun. 25, 2026), <https://www.consumerfinance.gov/consumer-tools/money-as-you-grow/bookshelf/>.

¹³ See, e.g., Consumer Fin. Prot. Bureau, *CFPB Proud to Support the National Strategy for Financial Literacy* (Oct. 2, 2026), <https://www.consumerfinance.gov/about-us/newsroom/cfpb-proud-to-support-the-national-strategy-for-financial-literacy/>.

2. Fair lending

2.1 Fair lending priorities

The CFPB continues to align its fair lending efforts with the administration’s priorities, including addressing unlawful debanking. In the supervision and enforcement of fair lending laws, the CFPB is focusing on matters with direct evidence of intentional discrimination on a prohibited basis and identified victims. In these priority areas, the CFPB focused its fair lending efforts on reversing regulatory overreach in support of the administration’s deregulatory agenda and aligning the regulations with the statutes and the Constitution, as described in more detail in the sections that follow.

2.1.1 Debanking

On August 7, 2025, President Trump signed Executive Order 14331, “Guaranteeing Fair Banking for All Americans,” stating that no American should be denied access to financial services because of their political or religious beliefs.

Over the past year, the CFPB has reviewed its supervisory and consumer complaint data as well as publicly available information, such as news articles and court filings, to identify financial institutions that may present higher risks of engaging in unlawful debanking. Consistent with the Executive Order, the CFPB also reviewed its Examination Manual and confirmed that it does not reference reputation risk. The CFPB also reviewed its guidance, regulations, and other materials used to regulate or examine financial institutions under its authority for reputation risk concepts that could result in unlawful debanking. All such references were eliminated.

During the reporting period, debanking continued to be a top priority for the CFPB. It has dedicated resources across the Bureau to implement Executive Order 14331 to ensure banking decisions are made consistent with the law and do not substitute unlawful practices for “individualized, objective, and risk-based analyses.”¹⁴

As part of this work, the CFPB is evaluating financial institutions for compliance with the Equal Credit Opportunity Act (ECOA) and Fair Credit Reporting Act (FCRA), particularly the adverse action notice requirements under these laws, and Unfair, Deceptive, or Abusive Acts or Practices (UDAAP). The CFPB is also evaluating institutions for evidence of intentional discrimination on the basis of religion.

¹⁴ Exec. Order No. 14331, Guaranteeing Fair Banking for All Americans, 90 Fed. Reg. 38925 (Aug. 12, 2025), available at <https://www.federalregister.gov/documents/2025/08/12/2025-15341/guaranteeing-fair-banking-for-all-americans>.

In April 2026, the Bureau published its Strategic Plan for FY 2026—FY 2030,¹⁵ which includes as its first objective “guaranteeing fair banking for all Americans.” As part of the CFPB’s strategies to accomplish its debanking work, the CFPB partners closely with other financial regulators, including the DOJ and the OCC. The CFPB is part of the DOJ’s Equal Access to Banking Task Force through which the agencies aim to deploy a comprehensive strategy to combat politicized or unlawful debanking activities. We look forward to further collaboration in the future.

The CFPB also reviewed supervisory and complaint data, and created a channel for external feedback, to identify financial institutions subject to the CFPB’s jurisdiction that have had any past or current, formal or informal, policies or practices that require, encourage, or otherwise influence such financial institution to engage in politicized or unlawful debanking and to take appropriate remedial action, to the extent authorized and consistent with applicable law.

In May 2026, the CFPB overhauled its website to prominently feature debanking on its landing page: <https://content.consumerfinance.gov/>. The CFPB also refocused its fair lending webpage¹⁶ to highlight debanking as a priority area, inviting consumers who believe they have been unlawfully debanked to contact us. These efforts will raise the public’s awareness of these issues and also identify institutions for potential debanking work in the future.

2.1.2 Home Mortgage Disclosure Act (HMDA)

On March 31, 2026, the CFPB released the HMDA Modified Loan Application Register (LAR) data for 2025 on the Federal Financial Institutions Examination Council’s (FFIEC’s) HMDA Platform for approximately 4,768 HMDA filers.¹⁷ That data contains loan-level information filed by financial institutions and was modified by the Bureau to protect consumer privacy.

On June 23, 2026, the CFPB, on behalf of the FFIEC, released data on 2025 mortgage lending transactions reported under HMDA by 4782 U.S. financial institutions. The Snapshot National Loan-Level Dataset released contains the national HMDA datasets as of June 2, 2026. The CFPB released several other data products at the same time, including the 2025 Snapshot National Loan-Level Dataset, the HMDA Dynamic National Loan-Level Dataset, and Aggregate and Disclosure Reports. In addition, the One-Year National Loan Level Dataset for 2024 and the Three-Year National Loan Level Dataset for 2022 were released. These releases were modified by the Bureau to protect consumer privacy and were announced on the FFIEC website.¹⁸

¹⁵ See https://files.consumerfinance.gov/f/documents/cfpb_strategic-plan_fy2026-fy2030.pdf.

¹⁶ See <https://content.consumerfinance.gov/fair-lending/>.

¹⁷ See <https://www.consumerfinance.gov/about-us/newsroom/2025-hmda-data-on-mortgage-lending-now-available/>.

¹⁸ See <https://www.ffiec.gov/news/press-releases/2026/an-06-23>.

More information about HMDA data and data products can be found at <https://ffiec.cfpb.gov/>.

2.2 Fair lending supervision and enforcement

The CFPB's supervision program assesses compliance with federal fair lending consumer financial laws at banks and nonbanks over which the CFPB has supervisory authority. During the reporting period, the CFPB began scoping supervisory activities at financial services institution under the CFPB's jurisdiction to determine compliance with federal laws, including ECOA, HMDA, and Regulation B and C, respectively. These activities are scheduled to begin after the end of this reporting period. The CFPB did not cite any fair lending violations during the reporting period.

Fair Lending supervisory activities focus on entities' compliance with ECOA and HMDA. ECOA examination work focuses on uncovering direct evidence of intentional discrimination on a prohibited basis, systemic failures to provide applicants with legally required notices of adverse actions, and lenders' systems for identifying risks of non-compliance with ECOA and its implementing Regulation B. HMDA examination work focuses on validating the accuracy of key data points collected and submitted by financial institutions in accordance with Regulation C.

The Bureau's fair lending enforcement program continued to conduct investigations and, as appropriate, address violations of fair lending laws under the CFPB's authority. The CFPB is required to refer matters to the DOJ when it has reason to believe that a creditor has engaged in a pattern or practice of lending discrimination. During the reporting period, the CFPB did not make any such referrals to DOJ, but did move forward with fair lending investigations, consistent with the new administration's stated priorities.

The CFPB focuses its fair lending efforts on intentional discrimination with identified victims. If a financial institution has intentionally discriminated, the CFPB will seek the maximum penalties.

2.3 Fair lending rulemakings & guidance

During the reporting period, the CFPB engaged in several priority rulemakings related to fair lending, including issuing a final rule to amend Regulation B, subpart B, implementing section 1071 of the Dodd-Frank Act, and a final rule for Regulation B, subpart A, implementing ECOA.

2.3.1. Section 1071, Small Business Lending

On May 1, 2026, the CFPB issued a [final rule](#) revising Regulation B, subpart B, which implements changes to ECOA made by section 1071 of the Dodd-Frank Act. The amended rule

changes the scope of what constitutes a covered financial institution and covered credit transaction, modifies the gross annual revenue threshold in the rule’s definition of small business from \$5 million or less to \$1 million or less, removes certain data points not required by the statute, and alters certain requirements related to how data is collected. The rule also extends the compliance date to January 1, 2028. The CFPB believes these changes streamline the rule, reduce complexity for lenders, and improve data quality, thereby advancing the purposes of section 1071 and complying with recent executive directives.

More information is available at: <https://www.consumerfinance.gov/1071-rule/>, a page compiling key materials related to the CFPB’s small business lending rulemaking.

2.3.2 Regulation B, ECOA

On April 22, 2026, the Bureau issued a [final rule](#) amending provisions of Regulation B, subpart A, implementing ECOA to facilitate compliance with ECOA by clarifying the obligations imposed by the statute.¹⁹ The final rule was effective July 21, 2026.

The rule provides that ECOA does not authorize disparate impact claims. The final rule removed the longstanding “effects test” language from Regulation B and its commentary and replaced it with statements affirming that ECOA does not authorize disparate impact liability. Disparate impact was first read into ECOA based solely on the law’s legislative history. However, under the plain meaning of ECOA’s text, disparate impact is not a cognizable theory of liability under the statute and is contrary to the principles of Equal Protection of the Constitution.

It amends the prohibition on discouraging applicants or prospective applicants to limit prohibited “statements” to spoken or written words or visual images as opposed to broader “acts or practices” such as branch placement or advertisement targeting. Liability also only attaches to statements that a creditor knows or should know would cause a reasonable person to believe the creditor would deny, or offer worse terms on, a credit application because of a prohibited basis characteristic. This change was designed to protect targeted advertising from discouragement claims, specifically providing that encouraging messages directed at one audience would not be treated as discouraging to others who were not the intended recipients of such messages. Merely controversial or provocative speech is to be distinguished from statements that do convey discriminatory exclusion.

The rule also amends the standards for Special Purpose Credit Programs offered or participated in by for-profit organizations to include new standards and conditions. It prohibits for-profit creditors from using race, color, national origin, or sex (or any combination thereof) as eligibility

¹⁹ 91 Fed. Reg. 21620 (Apr. 22, 2026).

criteria for special purpose credit programs. For any special purpose credit programs that still use other protected classes as eligibility criteria (such as religion, marital status, age, or public assistance income), the creditor would face new restrictions, including stringent documentation and evidence requirements. The stringent new conditions help ensure that Congress’s command to make these special purpose credit programs available for certain credit transactions “when it has been clearly demonstrated on the public record that without such exemption the consumers involved would effectively be denied credit.”²⁰ The regulatory changes to special purpose credit programs now align with the law’s intended purpose and minimize risks of impermissible and unconstitutional discrimination.

More information about the amendments to Regulation B can be found on our website.²¹

2.3.3 Rescission of 2020 Advisory Opinion related to Equal Credit Opportunity (Regulation B); Special Purpose Credit Programs

On June 17, 2026, the CFPB rescinded an advisory opinion issued in December 2020 regarding Regulation B, as it applies to certain aspects of special purpose credit programs designed and implemented by for-profit organizations to meet special social needs.²² Specifically, the 2020 advisory opinion clarified the content that a for-profit organization must include in a written plan that establishes and administers a special purpose credit program under Regulation B. The advisory opinion also clarified the type of research and data that may be appropriate to inform a for-profit organization’s determination that a special purpose credit program is needed to benefit a certain class of persons.

The CFPB rescinded the advisory opinion because it contained statements that conflicted with recent amendments to Regulation B and to avoid any confusion about the appropriate standards and related conditions for special purpose credit programs offered or participated in by for-profit organizations. For example, the advisory opinion stated that all program participants in a special purpose credit program offered or participated in by a for-profit organization may be required “to share one or more common characteristics (for example, *race, national origin, or sex*)”;²³ the April 2026 final rule, however, prohibits any special purpose credit program offered or participated in by a for-profit organization from using the common characteristic of race, color,

²⁰ See *Joint Explanatory Statement of the Committee of the Conference*, Cong. Rec. H5493 (daily ed. Mar. 4, 1976) (text appears in House and Senate Reports).

²¹ See <https://www.consumerfinance.gov/compliance/compliance-resources/other-applicable-requirements/equal-credit-opportunity-act/>.

²² See <https://www.federalregister.gov/documents/2026/06/17/2026-12149/equal-credit-opportunity-regulation-b-special-purpose-credit-programs-rescission>

²³ The Bureau published the 2020 advisory opinion in the Federal Register. [86 FR 3762](#) (Jan. 15, 2021).

national origin, or sex, or any combination thereof, as a factor in determining eligibility for the program.

2.4 Fair lending outreach and education

The CFPB works with private industry, and fair lending, civil rights, consumer, and community advocates to promote fair lending compliance and education. These engagements include promoting CFPB's work and policy priorities through outreach events.

During the reporting period, the CFPB focused its fair lending outreach efforts on redesigning the fair lending page on its public website. The new fair lending content highlights how the CFPB works to guarantee fair banking for all Americans, fights unlawful debanking, and protects consumers' access to credit through oversight and enforcement of fair lending laws. The webpage also describes the CFPB's fair lending priorities and recent activities. Updates were also made consistent with various executive orders and recent amendments to Regulation B. More information is available at: <https://www.consumerfinance.gov/fair-lending/>.

3. Supervisory activity

The CFPB's supervisory activity is confidential, and the CFPB does not issue public supervisory actions. This section focuses on the Bureau's general activity from July 1, 2025, through June 30, 2026, and on the supervisory strategy and priorities that are guiding supervisory activity going forward.

During the reporting period, the CFPB carried out supervisory activities consistent with the supervision and enforcement priorities issued by the Bureau in April 2025. These priorities included:

- Providing redress to servicemembers, veterans, and other families;
- Mortgage origination and servicing;
- Fair Credit Reporting Act (FCRA) and Regulation V data furnishing violations;
- Fair Debt Collection Practices Act (FDCPA) and Regulation F violations relating to consumer contracts and debts;
- Fraudulent overcharges and fees
- Inadequate controls to protect consumer information resulting in actual loss to consumers;
- Actual intentional discrimination with actual identified victims;
- Compliance with disclosure statutes; and
- Actual fraud against consumers, where there are identifiable victims with material and measurable consumer damages.

In addition, consistent with Executive Order 14331, CFPB began supervisory activities designed to address unlawful debanking. For more information on debanking see Section 2.1.1.

During the reporting period, the Bureau focused on reviewing its inventory of open Supervisory Actions to ensure that they aligned with these priorities. Supervisory Actions are used by the Bureau to communicate specific goals for an institution to accomplish in order to correct violations of federal consumer financial law, remediate harmed consumers, and address related compliance management weaknesses. During the reporting period, the CFPB closed 1,327 of its 1,552 Supervisory Actions open on July 1, 2025 (approximately 86 percent), either because the entity demonstrated that it had sufficiently addressed the Supervisory Action, or because the Supervisory Action was based on findings that no longer aligned with Bureau priorities. Some of these Actions went back to 2012, requiring continuing reporting and administrative work by entities focusing on decade plus-old issues. The Bureau notified entities through Closeout Letters which Supervisory Actions were closed, that any prior communications regarding violations were null and void, and that they were no longer required to provide any additional information or reporting on those Actions. This provided certainty to supervised entities that a matter was

truly closed, unlike prior leadership’s open-ended communications which suggested that the Bureau can come back anytime to revive the matter.

In addition, the Bureau reassessed all 80 open examinations to determine whether the exam scope and preliminary findings were in alignment with new priorities. Sixty-six of those exams did not align, and the entities were notified via Closeout Letter that the exams were closed and that any prior communications by the examination team regarding any potential findings, violations of law, or compliance management deficiencies, were void.

Fourteen of the exams did align with Bureau priorities: in those cases, examiners coordinated with entities to obtain their commitment to correcting identified violations, addressing compliance management deficiencies that led to the violations, and identifying and remediating impacted consumers.

During the reporting period, the CFPB adopted a “Humility Pledge,” outlining the Bureau’s expectations as to how its examiners would conduct supervisory work going forward. Examiners are to read the pledge to each supervised entity prior to conducting exams.²⁴ The pledge states that supervisory examinations will be conducted in a much more targeted manner, focusing on ascertaining compliance of clearly identified product lines and based on specifically identified queries, directly tied to the governing statutory and regulatory regime. Read the script below or [open the PDF](#).

CFPB Humility in Supervision Pledge

The upcoming Supervision examination cycle is going to be fundamentally different from the prior ones under the former director Chopra. For 2026 examinations, in line with the Memorandum on Supervision and Enforcement Priorities (April 2025) the Bureau will focus its supervision resources on pressing threats to consumers, particularly service members and their families, and veterans, and in the areas that are clearly within the Bureau’s statutory authority. The Bureau will also avoid, where possible, duplication of supervision, where States or other regulators are already doing that job.

For this round of examinations, there will be greater transparency regarding the process and clarity regarding expectations. Bureau-supervised entities will receive advance notice of scheduled examinations providing them with the opportunity to plan. Requests related to exams will focus on Bureau priorities and hew to the defined scope of the exam and not venture into areas outside the scope. The scope of the exams will be on identified priority

²⁴ <https://www.consumerfinance.gov/about-us/newsroom/cfpb-supervision-division-releases-new-humility-pledge/>.

markets and the resulting findings will focus on pattern and practice violations of law where there is tangible and identifiable consumer harm.

Likewise, Matters Requiring Attention will focus on pattern and practice violations of law where there is substantive and identifiable consumer harm or clear violations of the disclosure requirements.

No longer will the Bureau ask for expansive data sets or other information which may seem unrelated to the exam or include information inconsistent with Bureau priorities. Any follow-up requests by examiners will first be discussed with an entity and will be tailored to the scope of the exam and the information already received from the entity. Examination times, which used to be 8 weeks, will be reduced commensurate with the defined scope of exams.

Examiners will be encouraged and incentivized to complete the work promptly and under budget. Supervised entities can expect timely responses from the Bureau and appropriate follow-up on outstanding and open matters such as exams and MRAs.

In sum, the Bureau's goal is to work collaboratively with the entities to review entities' processes for compliance and/or remedy existing problems. The Bureau is doing so by encouraging self-reporting and resolving issues in Supervision, where feasible, instead of via Enforcement.

If your experience with this round of examination is inconsistent with these principles, we encourage you to reach out to Calvin R. Hagins, Principal Deputy Assistant Director for the Office of Supervision Examinations, calvin.hagins@cfpb.gov and/or Chief Legal Officer, Mark Paoletta, mark.paoletta@cfpb.gov.

During the reporting period, the CFPB developed and began execution of an exam schedule consistent with the Bureau's supervision priorities. The Bureau reduced the number of exams scheduled by approximately 50 percent and focused supervision activity on depository institutions (as opposed to nondepository institutions), on actual consumer fraud, and on areas that are clearly within its statutory authority. The Bureau is not pursuing supervision under novel legal theories, including novel legal theories related to the Bureau's authority. The Bureau is avoiding duplicating similar oversight either at the federal or state level, and focusing its supervisory authorities on conciliation, correction, and remediation of harms subject to consumers' complaints.

Given this targeted focus, and consistent with the principles outlined in the Humility Pledge, the exam teams were significantly scaled down from the former eight-by-eight-by-eight model, where eight examiners spent eight weeks, eight hours a day, at a supervised institution, with

practically no other limits to their remit. This model did not take into account the risk of the exam or the experience of the examiners. Instead, the team size and the length of the exam were reduced to reflect targeted queries and to be commensurate with the risk level of the entity's product line subject to the exam. Moreover, in some cases, the resource level (time and/or number of examiners) decreased once the CFPB received the information request responses and adjusted the scope of individual exams based on these responses. The Bureau also has started to see more cooperation of the supervised entities and, thus, shorter exams, given the focus on conciliation and remediation, rather than the Bureau's former posture of penalizing self-reporting and discouraging remediation by the entities. Additionally, the Bureau has abolished the Supervision Regions and centralized the Division, leading to more efficiencies in the scheduling, staffing, and execution of examinations.

4. Enforcement actions

This section focuses on the Bureau’s enforcement activity from July 1, 2025, through June 30, 2026. In April 2025, the CFPB rescinded its prior enforcement priorities and set forth new enforcement priorities for the Bureau. In May 2026, the CFPB also announced new principles that further articulated the enforcement work that the Bureau should focus on and how that work should be conducted. They are:

- *Addressing Actual Harm to Consumers:* CFPB focuses its enforcement on addressing actual harm to consumers. When an institution violates the law and causes real and meaningful harm to consumers, the CFPB uses its enforcement authority to ensure that violations are remedied and consumers are made whole. CFPB will not take action in cases where it believes consumers simply made unwise decisions, or cases involving theoretical or highly speculative harm.
- *Due Process:* All Americans are entitled to know what the rules are before they are enforced against them, and the CFPB will ensure its enforcement actions comport with this basic tenet of due process. CFPB enforcement actions are rooted in a clear grant of statutory authority or a regulation promulgated through notice and comment. The CFPB does not seek to stretch the bounds of its statutory authority through novel interpretations or advance a policy agenda through its enforcement actions.
- *Collaboration:* The CFPB is charged with taking appropriate enforcement action to address violations of federal consumer financial law, including filing public enforcement actions when appropriate. But not all situations require an adversarial process and the pursuit of an enforcement action. The CFPB seeks to collaborate with institutions to remedy legal violations voluntarily and make consumers whole for any harm they have suffered. Institutions who self-report violations will not be unnecessarily punished for their candor and willingness to proactively address problems. This approach maximizes the benefit to consumers, and ensures any harm can be addressed quickly, instead of waiting years for the resolution of litigation. In any event, the CFPB will take no more time than necessary to arrive at a fair resolution that accounts for the interests of consumers, institutions, and the CFPB.
- *Efficiency:* CFPB is committed to maximizing its resources and operating efficiently. In addition to pursuing a more collaborative approach to addressing issues, the CFPB also refrains from engaging in duplicative enforcement work. CFPB does not pursue an enforcement action where the states or other regulators are better suited to do so. CFPB does not undertake such actions, or engage in joint actions, to run up its number of enforcement actions or in pursuit of good press coverage.

These principles are consistent with the Bureau’s approach to Supervision, as set forth in the Humility Pledge. *See Supra* Section 3.

During the reporting period, the CFPB has focused its enforcement resources on the CFPB’s new priorities for enforcement, including:

- Providing redress to servicemembers, veterans, and their families;
- Mortgages;
- Fair Credit Reporting Act (FCRA) and Regulation V data furnishing violations;
- Fair Debt Collection Practices Act (FDCPA) and Regulation F violations relating to consumer contracts and debts;
- Fraudulent overcharges and fees; and
- Inadequate controls to protect consumer information resulting in actual loss to consumers.

The CFPB is focusing on actual intentional discrimination with actual identified victims. Unlike in the past, it is not engaging in or facilitating unconstitutional racial classification or discrimination in its enforcement of fair lending law. That is, the Bureau is not engaging in redlining enforcement based solely on statistical correlation and/or stray remarks that may be susceptible to adverse inference.

During the reporting period, the CFPB closed approximately 40 percent of the CFPB’s pending investigations consistent with the CFPB’s new enforcement priorities. The CFPB closed investigations involving deprioritized markets such as students and matters that were based on the perception that consumers made “wrong” choices rather than addressing actual fraud with identifiable victims with material and measurable damages.

Notably, the CFPB closed its investigation into Credova Financial, LLC, which used innovative financial technology solutions to provide consumer financing to facilitate Americans exercising their Second Amendment rights. This investigation was not aimed at protecting consumers, but at suppressing activities protected by the First and Second Amendment. This investigation also represented precisely the kind of unconstitutional targeting that President Trump prohibited in his Executive Order on debanking.

Overall, the CFPB has taken substantial steps during the reporting period, to align its ongoing work with these new priorities. That means that, on the one hand, enforcement actions that advanced the Bureau’s priorities, particularly in the areas of protection of servicemembers, veterans and their families, were pursued vigorously, including many successfully resolved during the reporting period, and, on the other hand, enforcement actions that did not align with the priorities were terminated.

A summary of the public enforcement actions is outlined in Table 1 below.

CFPB Public Enforcement Action	Number of Public Enforcement Actions
Dismissed or withdrew as plaintiff	1
Terminated a pending order	16
Initiated	1
Resolved	9*
Pending litigation as of June 30, 2026	5

Table 1: CFPB Enforcement Actions from July 1, 2025, to June 30, 2026

*Includes one action that was also initiated during the reporting period.

A brief statement of the issues in these public enforcement actions is set forth below. Those actions taken with respect to covered persons that are not credit unions or depository institutions are noted within the summary of the action.

4.1 Resolved actions aligned with new priorities, including protecting servicemembers

The CFPB has continued to diligently prosecute and bring only those cases that were consistent with the CFPB’s new priorities, including actions with identifiable consumer harm, fraudulent fees, or harm against servicemembers and their families, and veterans. With respect to these actions, the CFPB has obtained favorable results.

In particular, the Bureau has taken steps to focus its enforcement resources on pressing threats to servicemembers and their families, and veterans. During the reporting period the CFPB resolved three separate actions to address violations of the Military Lending Act (MLA) and other statutory protections of servicemembers. The actions are listed in descending chronological order by their date of final resolution.

- *Consumer Financial Protection Bureau v. Pennsylvania Higher Education Assistance Agency, The National Collegiate Master Student Loan Trust I, et al.* (M.D. Pa. File No. 1:24-cv-00756) (not a credit union or depository institution). On May 6, 2024, the CFPB filed a complaint and two proposed stipulated final judgments to resolve the CFPB’s claims against the National Collegiate Student Loan Trusts (the Trusts) and the Pennsylvania Higher Education Assistance Agency d/b/a American Education Services (PHEAA), respectively. PHEAA is a student loan servicer and has been the primary servicer for loans held by the Trusts since at least 2006. The CFPB alleged that the Trusts and PHEAA violated the CFPA’s prohibition on unfair and deceptive acts and practices.

The court entered the stipulated final judgments on October 1, 2024, overruling an objection by a third party, Pacific Investment Management Company, LLC (PIMCO). PIMCO appealed that order. PHEAA and the Trusts paid civil money penalties in compliance with the judgments, and on January 2, 2025, the district court granted PHEAA's motion to stay the redress provisions of the Trusts' judgment, pending the duration of PIMCO's appeal. On December 8, 2025, the district court entered a modified stipulated final judgment and order, which narrowed the prospective and injunctive provisions of the stipulated judgments, retaining only the civil money penalties and certain redress obligations related to borrower requests for Servicemembers Civil Relief Act protections.

- *Consumer Financial Protection Bureau v. MoneyLion Technologies Inc.; ML Plus, LLC; et al.* (S.D.N.Y. No. 1:22-cv-08308) (not a credit union or depository institution). On September 29, 2022, the CFPB filed a lawsuit against MoneyLion Technologies Inc. (MoneyLion), ML Plus, LLC, and 37 MoneyLion lending subsidiaries. MoneyLion is a fintech company (formerly known as MoneyLion Inc.) that offers online installment loans and other products to consumers through its lending subsidiaries and membership programs through its subsidiary ML Plus. As set forth in the second amended complaint, the CFPB alleged that MoneyLion and its lending subsidiaries violated the MLA and the CFPB's prohibition on unfair, deceptive, and abusive acts and practices.

On November 21, 2025, the CFPB and all defendants jointly filed a proposed stipulated final judgment and order to resolve the CFPB's claims, which the court entered on November 24, 2025. The stipulated final judgment and order, among other things, requires the defendants to pay \$1,750,000 in consumer redress and implement injunctive provisions consistent with the MLA.

- *Consumer Financial Protection Bureau v. FirstCash, Inc.; Cash America West, Inc.; et al.* (N.D. Tex. No. 4:21-cv-01251) (not a credit union or depository institution). On November 12, 2021, the CFPB filed a lawsuit against FirstCash, Inc. and Cash America West, Inc., a subsidiary of FirstCash, and on June 21, 2022, the CFPB filed an amended complaint adding 18 additional FirstCash subsidiaries as defendants in the lawsuit. FirstCash owns and operates over 1,000 retail pawnshops in the United States, offering pawn loans through its wholly owned corporate subsidiaries. The CFPB alleged that FirstCash and its subsidiaries made pawn loans to active-duty servicemembers and their dependents that violated the MLA and that the alleged violations of the MLA were violations of a 2013 CFPB order against a predecessor entity, Cash America International, Inc.

On July 11, 2025, the CFPB and all defendants jointly filed a proposed stipulated final judgment and order to resolve the CFPB's claims, which the court entered the same day.

The order requires defendants to set aside \$5,000,000 to fully redress all affected consumers, pay a civil money penalty of \$4,000,000 to the CFPB, and comply with the MLA and either offer an MLA-compliant loan product to servicemembers and their families or comply with a regulatory safe harbor meant to screen for MLA-protected borrowers.

The CFPB resolved the following additional six public enforcement actions during the reporting period. The actions are listed in descending chronological order by their date of final resolution.

- *Consumer Financial Protection Bureau v. Nationwide Biweekly Administration, Inc. et al.* (N.D. Cal. No. 3:15-cv-2106) (not a credit union or depository institution). On May 11, 2015, the CFPB filed a complaint against Nationwide Biweekly Administration, Inc., Loan Payment Administration LLC, and Daniel S. Lipsky, alleging that they engaged in abusive and deceptive acts and practices in violation of the CFPA and the TSR.

Following a trial, on September 8, 2017, the district court issued an opinion and order finding that the defendants had engaged in deceptive and abusive conduct in violation of the CFPA and TSR. The court imposed a civil money penalty but denied the Bureau's request for restitution and disgorgement. On November 9, 2017, the court reduced the previous order to a judgment that included permanently enjoining defendants from engaging in specified acts or practices.

Both parties appealed. On January 27, 2023, the United States Court of Appeals for the Ninth Circuit vacated the district court's September 8, 2017 order and remanded the case to the district court to consider several issues raised on appeal. The Ninth Circuit's decision did not include a ruling on the merits of the parties' respective appeals.

On August 28, 2024, the district court reaffirmed its 2017 order and opinion, and on August 29, 2024, entered a new judgment in the same form as the original, imposing a permanent injunction, awarding injunctive relief prohibiting defendants from engaging in the conduct determined to be unlawful, and imposing a \$7,930,000 civil money penalty. Defendants appealed, and on November 17, 2025, the Ninth Circuit affirmed the lower court's decision. On February 17, 2026, defendants filed a petition for a writ of certiorari, which was denied on March 23, 2026.

- *Consumer Financial Protection Bureau v. CashCall, Inc.; WS Funding, LLC; Delbert Services Corporation; and J. Paul Reddam* (D. Mass. No. 1:13-cv-13167), transferred to (C.D. Cal. No. 2:15-cv-07522) (not a credit union or depository institution). On December 16, 2013, the CFPB filed a complaint against online lender CashCall Inc.; its owner J. Paul Reddam; WS Funding, LLC, a subsidiary; and Delbert Services Corporation, an affiliate. The CFPB's amended complaint, filed on March 21, 2014,

alleged that the defendants violated the CFPA's prohibition against unfair, deceptive, and abusive acts and practices.

On August 31, 2016, the court granted the Bureau's motion for partial summary judgment, concluding that the defendants engaged in deceptive acts or practices by demanding and collecting payment on debts that consumers did not owe. Following a trial, on January 19, 2018, the court issued findings of fact and conclusions of law imposing a \$10,280,000 civil money penalty but denying the Bureau's request for restitution and an injunction.

The Bureau and the defendants appealed. On May 23, 2022, the Ninth Circuit affirmed the district court's finding of liability; vacated the district court's penalty, remanding for the district court to reassess the penalty taking into account defendants' reckless conduct; and vacated the district court's decision to award no restitution, remanding to the district court to determine whether and what restitution would be appropriate in consideration of the Ninth Circuit Court's opinion.

On February 10, 2023, the district court issued an order awarding the Bureau a \$33,276,264 civil money penalty and \$134,058,600 in restitution. On March 16, 2023, CashCall appealed the district court's final judgment. The Ninth Circuit affirmed the district court's judgment and issued an order and amended opinion on April 24, 2025. On September 19, 2025, CashCall filed a petition for certiorari with the U.S. Supreme Court. The Solicitor General filed a brief in opposition on behalf of the CFPB on January 23, 2026. The petition was denied on March 2, 2026.

- *Bureau of Consumer Financial Protection and the Commonwealth of Massachusetts ex rel. Maura Healey, Attorney General v. Commonwealth Equity Group, LLC (d/b/a Key Credit Repair); Nikitas Tsoukaless (a/k/a Nikitas Tsoukalis) (D. Mass. 1:20-cv-10991)* (not a credit union or depository institution). On May 22, 2020, the CFPB and Commonwealth of Massachusetts Attorney General jointly filed a lawsuit against Commonwealth Equity Group, LLC, which does business as Key Credit Repair, and Nikitas Tsoukaless (also known as Nikitas Tsoukalis), Key Credit Repair's president and owner. The amended complaint alleged that defendants violated the Telemarketing Sales Rule (TSR) and the CFPA's prohibition on deceptive acts and practices.

On September 30, 2024, the district court entered a memorandum and order granting the plaintiffs' motion for summary judgment on all counts. The court ordered a judgment for consumer redress against the defendants, imposed a penalty, and ordered the defendants to come into compliance. On October 28, 2024, defendants moved for reconsideration of the September 30, 2024, memorandum and order, and on September 30, 2025, the court

denied reconsideration of its findings on liability but ordered a hearing on its findings on relief.

On December 17, 2025, the parties filed a proposed stipulated final judgment and order as to relief, which the court entered on December 18, 2025. The order bans defendants from engaging in credit-repair and debt-relief services for 25 years and requires defendants to pay a \$1 civil money penalty, which enables the CFPB to access the civil penalty fund for purposes of redressing harmed consumers. The order also requires defendants to pay \$20,000 in partial satisfaction of a redress judgment that includes \$36,229,618 for fees charged to consumers since 2013, the full amount of which is suspended based on defendants' limited ability to pay.

- *Consumer Financial Protection Bureau; Commonwealth of Massachusetts; The People of the State of New York, by Letitia James, Attorney General of the State of New York; and Commonwealth of Virginia, ex rel. Mark R. Herring, Attorney General v. Nexus Services, Inc.; Libre by Nexus, Inc.; Michael Donovan; Richard Moore; and Evan Ajin* (W.D. Va. 5:21-cv-00016) (not a credit union or depository institution). On February 22, 2021, the CFPB filed a lawsuit against Nexus Services, Inc. (Nexus), Libre by Nexus, Inc. (Libre), and their principals, Michael Donovan, Richard Moore, and Evan Ajin. Libre is a wholly owned subsidiary of Nexus, and both are non-banks with their principal places of business in Virginia. The CFPB alleged that Libre and its owners violated the CFPB's prohibition on deceptive and abusive acts and practices through their scheme to offer to pay immigration bonds to secure the release of consumers held in federal detention centers in exchange for large upfront fees and hefty monthly payments; and that Nexus substantially assisted.

On May 11, 2023, the district court found the defendants in civil contempt and entered default against them. Following an appeal that was dismissed for a lack of jurisdiction, on April 1, 2024, the district court granted final judgment to the CFPB and the states. The court ordered defendants to pay \$230,996,970.84 in consumer redress; ordered each defendant to pay the CFPB \$111,135,620 in civil money penalties; ordered defendants to pay \$24,390,000 in penalties to the states; among other restrictions, enjoined defendants from requiring consumers to wear a GPS device or collect payments related to GPS monitoring; and required defendants to make certain clear and prominent disclosures in writing. The Fourth Circuit affirmed the judgment on October 8, 2025, and issued an amended opinion on October 15, 2025.

- *Consumer Financial Protection Bureau v. Synapse Financial Technologies, Inc. (In re: Synapse Financial Technologies, Inc.)* (Bankr. C.D. Cal. Case No. 1:24-bk-10646, Adv. No. 1:25-ap-01052) (not a credit union or depository institution). On August 21, 2025, the CFPB commenced an adversary proceeding and filed a complaint and proposed

stipulated final judgment and order against Synapse Financial Technologies, Inc., which the court entered on September 12, 2025. Synapse is a Delaware corporation with its principal place of business in Woodland Hills, California that provided proprietary technology and software that acted as a bridge between nonbank fintech platforms that offered banking services to consumers and traditional partnering banks. The CFPB alleged that Synapse violated the CFPA’s prohibition against unfair acts and practices. The partnering banks determined that the total funds they were holding for consumers was less than the total amount of consumer funds reflected in records Synapse provided to them, reflecting a shortfall of between \$60 and \$90 million. Consumers did not have any access to their funds for weeks or months as the partnering banks reconciled their records with Synapse’s records and then distributed funds to consumers, and many consumers have not received the full amount of their account balance.

The stipulated final judgment provides for appropriate injunctive relief, including a prohibition on the sale of customer information, and a \$1 civil money penalty, which enables the CFPB to access the civil penalty fund for purposes of redressing harmed consumers. Thus far, based on the availability of funds in its Civil Penalty Fund, the CFPB has allocated \$ \$55,214,058 to address harmed consumers, which will be distributed in the coming months.

- *Bureau of Consumer Financial Protection et al. v. Consumer Advocacy Center Inc., d/b/a Premier Student Loan Center et al.* (C.D. Cal. 8:19-cv-01998) (not a credit union or depository institution). On October 21, 2019, the CFPB and the states of Minnesota, North Carolina, and California filed a complaint against related debt-relief companies Premier, True Count, and Prime, and associated individuals. The CFPB alleged the companies operate as a common enterprise, have engaged in deceptive practices, and charged unlawful advance fees in connection with the marketing and sale of student loan debt relief services. The CFPB also alleged the individuals substantially assisted the student loan debt relief companies. On August 7, 2025, the U.S. Court of Appeals for the Ninth Circuit affirmed the district court’s summary judgment against Kaine Wen, the only remaining defendant.

4.2 Actions withdrawn or dismissed

The CFPB dismissed, or withdrew as plaintiffs from, the following action pending from July 1, 2025 – June 30, 2026.

- *Consumer Financial Protection Bureau and United States of America v. Colony Ridge Development, LLC; Colony Ridge BV, LLC; Colony Ridge Land, LLC; and Loan Originator Services, LLC* (S.D. Tex. No. 4:23-cv-04729) (not a credit union or depository institution). On December 20, 2023, the CFPB, together with the DOJ, filed a complaint

against land development companies Colony Ridge Development, LLC and Colony Ridge BV, LLC, affiliate mortgage company Colony Ridge Land, LLC (collectively, the Colony Ridge defendants), and loan origination company Loan Originator Services, LLC (LOS). The CFPB and DOJ alleged that defendants violated ECOA by targeting Hispanic consumers with a predatory loan product. The CFPB separately alleged violations of the CFPA and Interstate Land Sales Full Disclosure Act. DOJ further alleged that defendants' conduct violated the Fair Housing Act (FHA). On February 10, 2026, pursuant to a joint stipulation of voluntary dismissal, the CFPB dismissed its claims with prejudice. That same day, the DOJ notified the court in a joint motion for dismissal that the DOJ, along with the State of Texas, had reached a settlement resolving the DOJ's claims and the State of Texas's claims in a related matter. Following a hearing on the motion, on April 10, 2026, the remaining parties filed a joint stipulation of dismissal, dismissing the action with prejudice and withdrawing their request for continuing jurisdiction. On April 28, 2026, the court dismissed the action with prejudice and denied the joint motion for dismissal as moot.

4.3 Final orders terminated

From July 1, 2025 – June 30, 2026, the CFPB terminated the pending final order, whether administrative or pending in court, in the following public enforcement actions. In line with priorities in the area of fair lending and to implement the administration's agenda, including Executive Orders, from the beginning of then-Acting Director Vought's tenure, the focus was to undo actions relying on disparate impact and other fair lending matters. These are highlighted separately. In all, but one (Navy Federal Credit Union), the entities paid required redress and civil penalty, where applicable. The consent orders were terminated because only burdensome administrative obligations remained, imposing unnecessary costs and requiring unwarranted oversight by the Bureau. The termination of the Navy Federal Credit Union consent order is explained below as it represented a significant overreach of the statutory authority by the prior Bureau leadership. The actions are listed in descending chronological order by their date of termination.

Fair Lending Matters:

- *In the Matter of Citibank, N.A.* (2023-CFPB-0013). On November 8, 2023, the CFPB issued an order against Citibank, N.A., which is a national bank headquartered in New York City, New York. The CFPB found that Citibank violated ECOA and its implementing Regulation B. On October 16, 2025, pursuant to the CFPB's authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 74 of the order, the CFPB terminated the order and waived any alleged non-compliance therewith. Citibank has fulfilled certain obligations under the order, including paying a civil money penalty of \$24,500,000 to the CFPB as required by Section X of the order, making redress payments required by

Section IX of the order, and taking steps to implement injunctive relief to prevent future violations required by the “Conduct Provisions” of the order.

- *In the Matter of Washington Federal Bank, N.A.* (2020-BCFP-0019). On October 27, 2020, the CFPB issued an order against Washington Federal Bank, N.A., a federally insured, for-profit national bank headquartered in Seattle, Washington, to address violations of the Home Mortgage Disclosure Act (HMDA). On September 22, 2025, pursuant to the CFPB’s authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 75 of the order, the CFPB terminated the order. Washington Federal has fulfilled several obligations under the order, including, among other things, paying a civil money penalty of \$200,000, and creating and implementing a compliance plan designed to ensure that its collection, recording, and reporting of HMDA data complies with applicable federal consumer financial laws and the terms of the order.
- *In the Matter of Washington Federal* (2013-CFPB-0005). On October 9, 2013, the CFPB issued an order against Washington Federal, a bank headquartered in Seattle, Washington, to address violations of HMDA. On September 22, 2025, pursuant to the CFPB’s authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 3 of Article XII of the order, the CFPB terminated the order. Washington Federal has fulfilled several obligations under the order, including, among other things, paying a civil money penalty of \$34,000.

Other Matters:

- *Consumer Financial Protection Bureau v. Affinion Group Holdings, Inc., et al. LLC* (D. Conn. No. 3:15-cv-01005) (not a credit union or depository institution). On July 1, 2015, the Bureau filed a complaint against Affinion Group Holdings, Inc., Affinion Group, Inc., Affinion Group, LLC, Affinion Benefits Group, LLC, Trilegiant Corporation, Watchguard Registration Services, Inc., and Global Protection Solutions, LLC, along with a proposed stipulated final judgment and order, which the court entered on October 27, 2015. The defendants are Delaware corporations based in Connecticut or Tennessee, which collectively advertised, sold, and delivered identity theft and credit monitoring products to consumers by establishing marketing and service agreements with banks. The Bureau alleged that defendants engaged in deceptive and unfair acts and practices in violation of the Consumer Financial Protection Act of 2010.

The stipulated judgment contemplated future modifications, including that certain modifications could be made if approved by the court upon motion of any party. In light of these provisions, on January 27, 2026, several defendants filed a motion to terminate the stipulated final judgment and order and dismiss the case with prejudice, to which the Bureau consented. As set forth in the motion, defendants fully disbursed the consumer

redress as required under Section IV of the order, paid the civil money penalty to the Bureau as required under Section V of the order, and to the best of defendants' knowledge, substantially complied with the other conduct provisions of the order. On February 4, 2026, the court terminated the stipulated final judgment and order and dismissed the case with prejudice.

- *In the Matter of TransUnion, Trans Union LLC, and TransUnion Interactive, Inc.* (2023-CFPB-0011) (not a credit union or depository institution). On October 12, 2023, the CFPB issued an order against TransUnion and two of its subsidiaries, TransUnion LLC, and TransUnion Interactive Inc. (collectively, TransUnion), which are headquartered in Chicago, Illinois. TransUnion LLC is one of the three nationwide consumer reporting agencies. The CFPB found that TransUnion violated FCRA and the CFPA's prohibition against unfair and deceptive acts and practices. On November 3, 2025, pursuant to the CFPB's authority under 12 U.S.C. § 5563(b)(3) and Paragraph 133 of the order, the CFPB terminated the order. TransUnion has fulfilled its obligations under the order, including paying a civil money penalty of \$5,000,000 to the CFPB as required by Section IX of the order, making redress payments required by Section VIII of the order, and taking steps to implement injunctive relief required by the "Conduct Provisions" of the order to prevent future violations.
- *In the Matter of Planet Home Lending, LLC* (2017-CFPB-0007) (not a credit union or depository institution). On January 31, 2017, the CFPB issued an order against Planet Home Lending, LLC, a mortgage servicer headquartered in Meriden, Connecticut, to address violations of RESPA and FCRA. On September 22, 2025, pursuant to the CFPB's authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 51 of the order, the CFPB terminated the order. Planet Home has fulfilled several obligations under the order, including, among other things, implementing the required redress plan, paying consumer redress of \$265,000, and changing business practices in light of the violations identified in the order.
- *In the Matter of Apple Inc.* (2024-CFPB-0012) (not a credit union or depository institution). On October 23, 2024, the CFPB issued an order against Apple Inc. to resolve violations of the CFPA's prohibition on unfair, deceptive, and abusive acts and practices. On September 22, 2025, pursuant to the CFPB's authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 83 of the order, the CFPB terminated the order and waived any alleged non-compliance therewith. Apple paid a civil money penalty of \$25,000,000 to the CFPB required by Section IX of the order.
- *In the Matter of U.S. Bank National Association* (2023-CFPB-0019). On December 19, 2023, the CFPB issued an order against U.S. Bank in connection with its administration of prepaid debit cards that held unemployment insurance benefits, alleging that U.S.

Bank engaged in unfair acts or practices in violation of the CFPA. On September 22, 2025, pursuant to the CFPB's authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 92 of the order, the CFPB terminated the order and waived any alleged noncompliance therewith. U.S. Bank has fulfilled certain obligations under the order, including, among other things, paying a civil money penalty of \$15,000,000 to the CFPB required by Section IX of the order, making redress payments required by Section VIII of the order, and taking steps to implement injunctive relief to prevent future violations required by "Conduct Provisions" of the order.

- *In the Matter of Enova International, Inc.* (2023-CFPB-0014) (not a credit union or depository institution). On November 15, 2023, the CFPB issued an order against Enova International, Inc., a publicly traded online small-dollar lender, headquartered in Chicago, Illinois, that markets, provides, and services loans under the brand names CashNetUSA (CNU) and NetCredit. The CFPB found that Enova violated the CFPA's prohibition on unfair acts and practices. On September 2, 2025, pursuant to the CFPB's authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 120 of the order, the CFPB terminated the order. Enova has fulfilled certain obligations under the order, including, among other things, paying a civil money penalty of \$15,000,000 to the Bureau required by Section XI of the order; retaining a third-party consultant to determine whether Enova's business records reflect that it provided redress to all affected consumers, as required by Paragraph 81 of the order; taking steps to provide redress to certain affected consumers whom the third-party consultant determined had not previously received complete redress, as required by Paragraph 85 of the order; and taking steps to implement injunctive relief to prevent future violations required by "Conduct Provisions" of the order.
- *In the Matter of U.S. Bank National Association* (2022-CFPB-0006). On July 28, 2022, the CFPB issued a consent order against U.S. Bank National Association, a national bank headquartered in Minneapolis, Minnesota, to resolve violations of TILA, TISA, FCRA, and the CFPA's prohibition on abusive acts and practices. On August 21, 2025, pursuant to the CFPB's authority under 12 U.S.C. § 5563(b)(3) and under Paragraph 79 of the order, the CFPB terminated the order and waived any alleged non-compliance therewith. U.S. Bank has fulfilled certain obligations under the order, including, among other things, paying a civil money penalty of \$37,500,000 to the CFPB required by Section IX of the order, issuing redress payments required by Section VIII of the order, and taking steps to implement injunctive relief to prevent future violations required by "Conduct Provisions" of the order.
- *In the Matter of Cash America International, Inc.* (2013-CFPB-0008) (not a credit union or depository institution). On November 21, 2013, the CFPB issued an order against Cash America International, Inc., one of the largest short-term, small-dollar lenders in the country, addressing violations of the MLA and the CFPA's prohibitions on failing to

provide required information to the CFPB and deceptive acts and practices. On July 22, 2025, pursuant to its authority under 12 U.S.C. § 5563(b)(3), the CFPB terminated the order in light of the CFPB's July 11, 2025, resolution with FirstCash, Inc., a successor entity. See *supra* Section 4.1 for a full description. Cash America has also fulfilled certain obligations under the order, including, among other things, paying a civil money penalty of \$5,000,000 and providing redress to consumers. The predecessor entity no longer exists, and the products addressed in the 2013 order are unconnected to the products of FirstCash.

- *In the Matter of Carrington Mortgage Services, LLC* (2022-CFPB-0010) (not a credit union or depository institution). On November 17, 2022, the CFPB issued an order against Carrington Mortgage Services, LLC, a California-based mortgage servicer operating in all fifty states, to address violations of the CFPA's prohibition on deceptive acts and practices and FCRA. On July 21, 2025, pursuant to its authority under 12 U.S.C. § 5563(b)(3), the CFPB terminated the order and waived any alleged non-compliance therewith. Carrington fulfilled certain obligations under the order, including paying a civil money penalty of \$5,250,000 to the CFPB, and taking steps to identify and provide refunds to affected consumers who had not yet received refunds as of the effective date of the order.
- *In the Matter of Vystar Credit Union* (2024-CFPB-0013). On October 31, 2024, the CFPB issued an order against VyStar Credit Union (VyStar), a Jacksonville, Florida based credit union, to resolve violations of the CFPA's prohibition on unfair acts and practices. On July 21, 2025, pursuant to its authority under 12 U.S.C. § 5563(b)(3), the CFPB terminated the order and waived any alleged non-compliance therewith. VyStar fulfilled certain obligations under the order, including, among other things, paying a civil money penalty of \$1,500,000 to the CFPB and taking steps to conduct an audit to verify that all fees and costs described in Paragraph 50(d) of the order were refunded to members who submitted requests.
- *In the Matter of Regions Bank* (2022-CFPB-0008). On September 28, 2022, the CFPB issued an order against Regions Bank, a bank headquartered in Birmingham, Alabama with consolidated assets over \$163 billion. On July 21, 2025, pursuant to its authority under 12 U.S.C. § 5563(b)(3), the CFPB terminated the order and waived any alleged non-compliance therewith. Regions fulfilled certain obligations under the order, including, among other things, paying a civil money penalty of \$50,000,000 to the CFPB and issuing payments to consumers under the redress plan required in Section VIII of the order.
- *In the Matter of Navy Federal Credit Union* (2024-CFPB-0014). On November 7, 2024, the CFPB issued an order against Navy Federal Credit Union, headquartered in Vienna,

Virginia, to resolve violations of the CFPA’s prohibition on unfair acts and practices. On July 1, 2025, pursuant to its authority under 12 U.S.C. § 5563(b)(3), the CFPB terminated the order and waived any alleged non-compliance therewith.

The Bureau’s consent order against Navy Federal concerned Authorize Positive-Settle Negative (APSN) fees. Navy Federal disclosed these fees three separate times and its customers had to opt-in to get the product. APSN protects consumers by ensuring they can complete a purchase when they have insufficient funds in their accounts (e.g., getting gas on the way to work or getting groceries for dinner on the way home). APSN also allows consumers to avoid other fees, including for bounced checks, and helps consumers avoid negative impact on their credit score due to untimely payments.

The Bureau’s consent order was premised on an erroneous and expansive interpretation of the UDAAP provision that the Bureau issued via guidance in 2022. Under the leadership of former director Chopra, the UDAAP provision became a Pandora’s box for the exercise of unchecked authority by the Bureau. Then-Acting Director Vought withdrew the UDAAP guidance in May 2025, both because it went beyond the Bureau’s statutory authority and because the government should not regulate by guidance, as President Trump’s Executive Order 13891 explained. Importantly, Navy Federal was penalized for conduct that preceded the issuance of the now-withdrawn guidance, raising a host of due process issues.

Navy Federal paid the full civil money penalty of \$15 million but did not pay any of the approximately \$80 million in redress, which would have come from the pockets of Navy Federal’s members.

- *In the Matter of Fay Servicing, LLC* (2024-CFPB-0007) (not a credit union or depository institution). On August 21, 2024, the CFPB issued an order against Fay Servicing, LLC, a residential mortgage servicer headquartered in Tampa, Florida. The order found that Fay Servicing violated an order previously issued by the CFPB in 2017, Regulation X, the Homeowners Protection Act, Regulation Z, and the CFPA. On July 1, 2025, pursuant to the CFPB’s authority under 12 U.S.C. § 5563(b)(3), the CFPB terminated the order. Fay Servicing fulfilled several obligations under the order, including, among other things, paying a civil money penalty of \$2,000,000 and paying \$3,000,000 to the Bureau for CFPB-administered consumer redress, which the CFPB will distribute to consumers consistent with the terms of the order.

4.4 Ongoing actions aligning with new priorities

The CFPB continued to litigate the following public enforcement actions as of the end of the reporting period. These actions are aligned with the CFPB’s new priorities, including addressing

violations of the FDCPA, fraudulent fees, and violations of FCRA. These actions are listed in descending chronological order by their initial filing date.

- *Consumer Financial Protection Bureau v. Experian Information Solutions, Inc.* (C.D. Cal. No. 8:25-cv-00024) (not a credit union or depository institution). On January 7, 2025, the CFPB filed a lawsuit against Experian Information Solutions, Inc., one of the largest consumer reporting agencies in the country. The CFPB alleges that Experian violated FCRA, inter alia, by failing to properly conduct reinvestigations of disputed information in consumer credit files and failing to delete inaccurate, incomplete, or unverified information in consumer credit files. The CFPB also alleges that Experian engaged in unfair acts or practices in violation of the CFPA by relying excessively on furnishers to resolve disputes and improperly reinserting tradelines into consumer credit reports.

On May 5, 2025, the court granted in part and denied in part defendant's motion to dismiss, finding some claims time-barred but allowing the CFPB to amend the complaint, which the CFPB filed on June 6, 2025. The defendant filed a second motion to dismiss, and on August 6, 2025, the court granted defendant's motion to dismiss with leave to amend. The CFPB filed a second amended complaint on August 22, 2025. The defendant filed a third motion to dismiss, which the court denied on October 22, 2025. Defendant filed an answer on November 3, 2025, and an amended answer on November 24, 2025. The Bureau filed a motion to strike several of defendant's affirmative defenses on December 15, 2025, which the court granted in part and denied in part on January 26, 2026. Fact discovery closed on May 29, 2026, and the case remains pending.

- *Consumer Financial Protection Bureau, New York, Colorado, Delaware, Illinois, Minnesota, North Carolina, and Wisconsin v. StratFS, LLC (f/k/a Strategic Financial Solutions, LLC) et al.* (W.D.N.Y. No. 1:24-cv-00040) (not a credit union or depository institution). On January 10, 2024, the CFPB and the attorneys general of seven states—New York, Colorado, Delaware, Illinois, Minnesota, North Carolina, and Wisconsin—filed a complaint and sought a temporary restraining order and preliminary injunction against StratFS, LLC f/k/a Strategic Financial Solutions, LLC, as well as its holding company Strategic Family, Inc.; various of its subsidiaries; and as individuals: SFS Chief Executive Officer Ryan Sasson and Jason Blust. The second amended complaint also named Daniel Blumkin, Albert Ian Behar, Richard Gustafson, Timothy Burnette, Michelle Gallagher, Fidelis Legal Support Services, LLC, Hedgewick Consulting, LLC, Lit Def Strategies LLC, Relialit, LLC, Blaise Investments LLC, Duke Enterprises LLC, and Twist Financial LLC as defendants and Cameron Christo and Bush Lake Trust as relief defendants. SFS is a debt-relief company with offices in Buffalo and Manhattan, New York. The second amended complaint alleges that since at least January 2016, SFS and the individual defendants have operated a debt-relief scheme that collects illegal

advance fees from vulnerable consumers through a web of interrelated companies they have created, including law firms, that serve as a facade for SFS's debt-relief operation.

On January 11, 2024, the court granted the CFPB's request for a temporary restraining order. On February 1-2, 2024, the court held an evidentiary hearing on the CFPB's motion for a preliminary injunction, which the court granted on March 4, 2024. On March 5, 2024, defendants began filing appeals from the district court's preliminary injunction decision. On June 2, 2025, the Second Circuit affirmed the district court's issuance of a preliminary injunction and related relief. On January 29, 2026, the Second Circuit dismissed three of the pending appeals regarding the application of the temporary restraining order and preliminary injunction to certain of the receivership defendants. On March 2, 2026, the Second Circuit dismissed the remaining appeal filed by a relief defendant. Defendants filed motions to dismiss, which the court denied on September 15, 2026. Discovery is ongoing.

- *Consumer Financial Protection Bureau v. Craig Manseth, Jacob Adamo, Darren Turco, United Debt Holding LLC, JTM Capital Management, LLC, UHG, LLC, UHG I LLC (also known as United Holding Group), and UHG II LLC (collectively holding themselves out as United Holding Group, United Holding Group, LLC, and United Holdings Group, LLC)* (W.D.N.Y. 1:22-cv-00029) (not a credit union or depository institution). On January 10, 2022, the CFPB filed a lawsuit against several individual debt collectors and buyers, and their companies. As set forth in the February 23, 2022, amended complaint, the CFPB alleges that the defendants, located in Colorado and New York, purchased defaulted consumer debt worth tens of millions of dollars and then collected on those debts using third-party agents who engaged in illegal debt-collection tactics, in violation of the CFPA and the FDCPA.

The defendants filed motions to dismiss on March 21, 2022, which the court denied on August 22, 2023. On September 1, 2023, the defendants moved to stay the case pending a decision from the Supreme Court in *CFPB v. Community Financial Services Association of America, Ltd.*, No. 22-448, which the court denied on February 26, 2024. Discovery is ongoing.

- *Consumer Financial Protection Bureau v. Judith Noh d/b/a Student Loan Pro, Judith Noh as an individual, Syed Faisal Gilani, and FNZA Marketing, LLC* (C.D. Cal. No. 8:21-cv-00488) (not a credit union or depository institution). On March 16, 2021, the CFPB filed a lawsuit against Student Loan Pro, a California sole proprietorship that telemarketed and provided debt-relief services focused on federal student-loan debt; Judith Noh, its owner; and Syed Gilani, its manager and owner-in-fact. The CFPB also named as a relief defendant FNZA Marketing, LLC (FNZA), a California company nominally owned by Noh and controlled by Gilani. The CFPB alleges that Student Loan

Pro conducted a student-loan debt-relief business from 2015 through 2019 that violated the TSR.

On December 3, 2024, the CFPB filed a proposed stipulated judgment, which the court entered on December 9, 2024, resolving the CFPB's claims against Noh and Student Loan Pro. On December 18, 2024, by agreement of the parties, the court dismissed FNZA from the action. Following a stay, on September 16, 2025, the CFPB filed a motion to amend Noh's stipulation and order, and on September 19, 2025, the CFPB filed a motion for summary judgment as to Gilani. Those motions and the case remain pending.

- *Bureau of Consumer Financial Protection v. FDATR, Inc., Dean Tucci, and Kenneth Wayne Halverson* (N.D Ill. 1:20-cv-06879) (not a credit union or depository institution). On November 20, 2020, the CFPB filed a lawsuit against FDATR, Inc., and its owners, Dean Tucci and Kenneth Wayne Halverson. FDATR was a corporation headquartered in Wood Dale, Illinois that promised to provide student-loan debt-relief and credit-repair services to consumers nationwide. FDATR involuntarily dissolved in September 2020. Tucci and Halverson both owned and managed FDATR. The CFPB alleges that FDATR, Tucci, and Halverson violated the TSR as well as the CFPA.

On February 25, 2021, the CFPB filed a notice of voluntary dismissal of Halverson, now deceased, and the court dismissed him from this action the next day. On February 7, 2022, the CFPB obtained a default judgment and order against FDATR imposing \$2,117,133.28 in consumer redress, a \$41,123,897 civil money penalty, and injunctive relief permanently banning it from offering or providing financial advisory, debt-relief, or credit-repair services and from telemarketing consumer financial products or services.

On January 10, 2025, the court granted summary judgment against Tucci, the remaining defendant, finding him liable for FDATR's violations of the TSR and CFPA. After additional briefing, the court, on May 9, 2025, found that restitution and a civil money penalty in the same amounts awarded against FDATR were warranted against Tucci, and on May 9, 2025, the court entered a final judgment and order against Tucci making him jointly and severally liable for \$2,117,133.28 in consumer redress, imposing a \$41,123,897 civil money penalty, and banning him from offering or providing financial-advisory, debt-relief, or credit-repair services for 10 years. On July 18, 2025, the court denied Tucci's motion to vacate the default judgment against FDATR and the final judgment against Tucci. On September 10, 2025, Tucci filed a notice of appeal, which remains pending.

5. Rules, orders, and significant initiatives

5.1 Significant rules and guidance adopted and proposed

The CFPB has executed on a robust deregulatory agenda to reverse regulatory overreach, reduce unjustified regulatory burdens, and streamline and clarify existing regulations. Regulatory actions under then-Acting Director Vought have been completed pursuant to several executive orders, including Executive Order 14219, titled “Ensuring Lawful Governance and Implementing the President’s ‘Department of Government Efficiency’ Deregulatory Initiative.” Executive Order 14219 directed agencies to review their regulations for consistency with law and the administration’s policy and to consider the deregulatory ideas provided by the public in response to a deregulatory request for information published by the Office of Management and Budget in 2025.

The CFPB has also been guided by Executive Order 14393, titled “Promoting Access to Mortgage Credit,” which directed the CFPB to consider amending several mortgage rules. Executive Order 14393 requires the CFPB to reduce regulatory burdens that have driven up mortgage costs, limited access for creditworthy borrowers, and weakened community bank participation in lending. Consistent with Executive Order 14393, and as discussed further below, the CFPB has focused on mortgage-related rulemaking projects during the reporting period.

This section spans work of the CFPB during the period of July 1, 2025, through June 30, 2026, and contains discussions of the following:

- Current regulatory priorities (Section 5.1.1)
- Significant final rules published (Section 5.1.2)
- Withdrawn, rescinded, or clarifying documents (Section 5.1.3)
- Additional deregulatory projects and efforts to remove unnecessary regulation (Section 5.1.4)
- Annual threshold rules (Section 5.1.5)

5.1.1 Current regulatory priorities

The CFPB’s current regulatory priorities include (1) reconsidering the Personal Financial Data Rights Rule, which the Bureau finalized under former director Chopra, and (2) pursuing rulemakings guided by Executive Order 14393, titled “Promoting Access to Mortgage Credit.”

Personal Financial Data Rights Rule. In July 2025, the CFPB announced its plan to reconsider certain aspects of a final rule published in October 2024 that implemented 12 U.S.C. § 5533, also known as section 1033 of the Dodd-Frank Act. The final rule requires banks, credit unions, and other financial service providers to make consumers’ data available upon request to consumers and authorized third parties in a secure and reliable manner and defines obligations for third

parties accessing consumers' data, including important privacy protections. In August 2025, the CFPB published an advance notice of proposed rulemaking seeking comments and data to inform its consideration of four issues related to implementation of section 1033. The CFPB is working on a notice of proposed rulemaking that would propose amendments to the underlying final rule. The following lists the underlying final rule and the related rulemaking document published in 2025:

- *Final Rule: Required Rulemaking on Personal Financial Data Rights* (October 2024).
<https://www.govinfo.gov/content/pkg/FR-2024-11-18/pdf/2024-25079.pdf>
- *Advance Notice of Proposed Rulemaking: Personal Financial Data Rights Reconsideration* (August 2025).
<https://www.govinfo.gov/content/pkg/FR-2025-08-22/pdf/2025-16139.pdf>

The CFPB has also been pursuing several mortgage-related rulemakings and initiatives, including as described below. These rulemakings are consistent with Executive Order 14393, titled “Promoting Access to Mortgage Credit.”

Ability to Repay/Qualified Mortgages. The CFPB is evaluating whether to modify the ATR requirements and QM definitions in Regulation Z, which implements TILA’s ATR requirements and defines several categories of QM loans, including General QMs. This work is consistent with Executive Order 14393, which directs the CFPB to consider proposing amendments to the rule. Most residential mortgage loans are subject to the ATR requirements, which the Dodd-Frank Act added to TILA.

Streamlining Mortgage Servicing for Borrowers Experiencing Payment Difficulties (Regulation X). In July 2024, the Bureau issued a proposed rule to simplify and streamline the mortgage servicing rules in Regulation X, which implements RESPA. The CFPB is now considering a final rule to make it easier for mortgage servicers to assist distressed borrowers by streamlining the loss mitigation review process.

- *Proposed Rule: Streamlining Mortgage Servicing for Borrowers Experiencing Payment Difficulties (Regulation X)* (July 2024).
<https://www.govinfo.gov/content/pkg/FR-2024-07-24/pdf/2024-15475.pdf>

As discussed in section 2.3 below, the CFPB continues to consider additional regulatory actions to implement Executive Order 14393. For example, in July 2026, the Bureau issued a Request for Information (RFI) *Request for Information Regarding Promoting Access to Mortgage Credit* (July 2026.)

5.1.2 Significant final rules published

Between July 1, 2025, and June 30, 2026, the CFPB finalized (1) a rulemaking under the Equal Credit Opportunity Act of 1974 (ECOA) and the Bureau’s Regulation B and (2) a rulemaking which reconsidered the Small Business Lending Rule, which had been finalized under former director Chopra. The CFPB also, jointly with other agencies, finalized a rule establishing data standards as required by the Financial Data Transparency Act of 2022.

Equal Credit Opportunity Act (Regulation B). In April 2026, the CFPB published a final rule amending Regulation B, the regulation implementing ECOA. The amendments facilitate compliance with ECOA by ensuring that the obligations are consistent with the statute. Specifically, the CFPB removed the “effects test” from the regulation and affirmatively stated that ECOA does not recognize disparate-impact liability. It also modified the prohibition on “discouragement” to focus on statements of intent to discriminate rather than statements that merely create negative impressions. Lastly, the rule prohibited creditors from using race, color, national origin, or sex as common characteristics under Special Purpose Credit Programs (SPCPs) and imposed additional requirements for for-profit creditors wishing to use SPCPs.

The following lists the related proposal and final rule that were published during the relevant period:

- *Proposed Rule: Equal Credit Opportunity Act (Regulation B) (November 2025).*
<https://www.govinfo.gov/content/pkg/FR-2025-11-13/pdf/2025-19864.pdf>
- *Final Rule: Equal Credit Opportunity Act (Regulation B) (April 2026).*
<https://www.govinfo.gov/content/pkg/FR-2026-04-22/pdf/2026-07804.pdf>

For more information on the changes to Regulation B, see Section 2.3.2 above related to fair lending rulemakings and guidance.

Small Business Lending Rule (Section 1071). The CFPB took action to eliminate unnecessary compliance burdens that would raise the cost and may lower the availability of credit for small businesses and communities. In May 2026, the CFPB published a rule revising certain provisions of Regulation B, subpart B, which implements changes to ECOA made by section 1071 of the Dodd-Frank Act by refocusing coverage under the rule to core lenders, products, and data points. For example, the rule excluded merchant cash advances, small dollar transactions, and agricultural loans from coverage under Regulation B, subpart B. It also minimized data collection and reporting requirements to adhere more closely to statutory requirements for those creditors that remain covered under the rule. The rule eliminated the requirement to collect data on pricing, denial-reasons, and LGBTQIA+-owned business status, as well as the required use of disaggregated categories in collecting race and ethnicity data points. The following lists the related rulemaking documents published during this period:

- *Final Rule: Small Business Lending Under the Equal Credit Opportunity Act (Regulation B); Extension of Compliance Dates* (October 2025).
<https://www.govinfo.gov/content/pkg/FR-2025-10-02/pdf/2025-19370.pdf>
- *Proposed Rule: Small Business Lending Data Collection under the Equal Credit Opportunity Act (Regulation B)* (November 2025).
<https://www.govinfo.gov/content/pkg/FR-2025-11-13/pdf/2025-19865.pdf>
- *Final Rule: Small Business Lending Under the Equal Credit Opportunity Act (Regulation B)* (May 2026).
<https://www.govinfo.gov/content/pkg/FR-2026-05-01/pdf/2026-08494.pdf>

Financial Data Transparency Act Joint Data Standards (June 2026). As required by the Financial Data Transparency Act of 2022, the CFPB, jointly with other agencies, published a final rule to establish data standards to promote interoperability of financial regulatory data across these agencies. The standards established pursuant to this joint rule will later be considered for potential incorporation (to the extent feasible) into data standards to be adopted for certain collections of information in separate rulemakings by the agencies or through other actions taken by the agencies.

- *Final Rule: Financial Data Transparency Act Joint Data Standards* (June 2026).
<https://www.federalregister.gov/documents/2026/06/25/2026-12787/financial-data-transparency-act-joint-data-standards.pdf>

5.1.3 Withdrawn and rescinded documents

From July 1, 2025, to June 30, 2026, the CFPB continued to reduce unjustified burdens and withdrew or rescinded a number of rulemaking documents, including interim final rules, final rules, and proposed rules, as summarized below:

- *Final Rule: Rescission of State Official Notification Rules; Withdrawal* (July 2025). The CFPB withdrew a previously published direct final rule that would have rescinded procedures by which a state official must notify the Bureau when the official takes an action to enforce the Consumer Financial Protection Act.
<https://www.govinfo.gov/content/pkg/FR-2025-07-21/pdf/2025-13665.pdf>
- *Final Rule: Procedures for Supervisory Designation Proceedings* (September 2025). The CFPB rescinded the amendments it adopted in April 2022, November 2022, and April 2024, to the Procedures for Supervisory Designation Proceedings, with the exception of some limited process adjustments. This rule finalized a proposed rule published in May 2025. The 2022-2024 rules could create a strong incentive for respondents to consent to

designation in order to avoid a public order discussing alleged risks to consumers from respondents, even in situations where a respondent may have meritorious responses. The public interest is not served if the CFPB designated entities that ought not to be designated but accede to designation out of fear of reputational harm.

<https://www.govinfo.gov/content/pkg/FR-2025-09-25/pdf/2025-18622.pdf>

- *Final Rule: Fair Credit Reporting Act; Preemption of State Laws* (October 2025). The CFPB issued this interpretive rule to clarify that the Fair Credit Reporting Act (FCRA) generally preempts State laws that touch on broad areas of credit reporting, consistent with Congress’s intent to create national standards for the credit reporting system. This interpretive rule replaced a July 2022 interpretive rule that the Bureau withdrew in May 2025. This interpretive rule was necessary in order to avoid 50-plus state regulatory regimes governing credit reporting in addition to the national standards established by federal law, which would have imposed substantial compliance costs on consumer reporting agencies, users of credit reports, and furnishers of credit report information.
<https://www.govinfo.gov/content/pkg/FR-2025-10-28/pdf/2025-19671.pdf>
- *Final Rule: Rules of Practice for Adjudication Proceedings* (October 2025). The CFPB rescinded amendments it adopted to the Rules of Practice on February 22, 2022, and March 29, 2023 (2022 and 2023 amendments). The 2022 and 2023 amendments that the CFPB rescinded included a new deposition process, amendments concerning timing and deadlines, bifurcation of proceedings, the process for deciding dispositive motions, and requirements for issue exhaustion, as well as other technical changes. This rule finalized a proposed rule published in May 2025.
<https://www.govinfo.gov/content/pkg/FR-2025-10-29/pdf/2025-19687.pdf>
- *Final Rule: Registry of Nonbank Covered Persons Subject to Certain Agency and Court Orders; Rescission* (October 2025). The CFPB rescinded a final rule issued in July 2024 that required certain types of nonbank covered persons subject to certain final public orders to report the existence of the orders and related information to a CFPB registry. This rule rescinded the final rule previously codified at 12 C.F.R. § 1092; a proposed rescission was published in May 2025. The CFPB was concerned that the costs the rescinded rule imposed on regulated entities, and that may have been passed on to consumers, were not justified by the speculative and unquantified benefits to consumers discussed in the rescinded rule’s analysis.
<https://www.govinfo.gov/content/pkg/FR-2025-10-29/pdf/2025-19689.pdf>
- *Withdrawal of Proposed Rule: Registry of Supervised Nonbanks That Use Form Contracts to Impose Terms and Conditions That Seek to Waive or Limit Consumer Legal Protections; Withdrawal of Proposed Rule* (October 2025). The Bureau withdrew its Notice of Proposed Rule: Registry of Supervised Nonbanks That Use Form Contracts to

Impose Terms and Conditions That Seek to Waive or Limit Consumer Legal Protections, published on February 1, 2023. The proposal would have imposed a significant burden on supervised nonbanks in order to collect and publish information of uncertain or speculative value or benefit, mostly about regulated entities' use of lawful terms and conditions. It also would have imposed significant burdens on the Bureau, beyond those the Bureau estimated when it issued the proposed rule, which are unwarranted in light of the speculative benefits and additional limitations on the Bureau's resources.
<https://www.govinfo.gov/content/pkg/FR-2025-10-29/pdf/2025-19690.pdf>

During the period July 1, 2025, to June 30, 2026, the Bureau also continued its deregulatory work by resolving regulatory uncertainty through the following documents:

- *Advisory Opinion: Truth in Lending (Regulation Z); Non-Application to Earned Wage Access Products* (December 2025). The CFPB issued this advisory opinion to resolve regulatory uncertainty regarding: (1) the applicability of the definition of credit under Regulation Z, which implements the Truth in Lending Act (TILA), to earned wage access (EWA) products that conform to the description of “Covered EWA” provided in part I.C.2 of the advisory opinion; and (2) the applicability of the definition of finance charge under Regulation Z to certain EWA-related charges (expedited delivery fees, tips) to the extent any EWA products meet the Regulation Z definition of credit. The CFPB also withdrew a proposed interpretive rule.
<https://www.govinfo.gov/content/pkg/FR-2025-12-23/pdf/2025-23735.pdf>
- *Withdrawal of Joint Statement on the Equal Credit Opportunity Act and Noncitizen Borrowers* (January 2026). The CFPB and the Department of Justice (DOJ) formally withdrew a joint statement published in October 2023 discussing the interaction between creditor policies related to an applicant's immigration or citizenship status and the requirements of ECOA and Regulation B.
<https://www.govinfo.gov/content/pkg/FR-2026-01-12/pdf/2026-00328.pdf>
- *Advisory Opinion: Equal Credit Opportunity (Regulation B); Special Purpose Credit Programs; Rescission* (June 2026). The CFPB rescinded an advisory opinion issued in December 2020 regarding Regulation B, which implements the Equal Credit Opportunity Act (ECOA), as it applies to certain aspects of special purpose credit programs designed and implemented by for-profit organizations to meet special social needs. See *supra* Section 2.3.3 for more information.
<https://www.govinfo.gov/content/pkg/FR-2026-06-17/pdf/2026-12149.pdf>

5.1.4 Additional deregulatory projects and actions to remove unnecessary regulation

The CFPB's robust deregulatory agenda aims to reduce the burden on regulated entities and remove unnecessary regulations. During the July 2025 to June 2026 reporting period, efforts included reducing the burden associated with CFPB supervision by seeking information in furtherance of potentially amending four rules that define nonbank larger participants and reducing burden for other regulated entities. As part of its focus on removing unnecessary regulations, the CFPB has also proposed changes to its Civil Penalty Fund procedural regulation.

Larger participants deregulatory rulemakings:

- *Advanced Notice of Proposed Rulemaking: Defining Larger Participants of the Consumer Reporting Market* (August 2025). The CFPB sought information to assist it in considering whether to propose a rule to amend the test to define larger participants in the consumer reporting market established by the CFPB's Defining Larger Participants of the Consumer Reporting Market Final Rule published on July 20, 2012.
<https://www.govinfo.gov/content/pkg/FR-2025-08-08/pdf/2025-15088.pdf>
- *Advanced Notice of Proposed Rulemaking: Defining Larger Participants of the Automobile Financing Market* (August 2025). The CFPB sought information to assist it in considering whether to propose a rule to amend the test to define larger participants in the automobile financing market established by the CFPB's Defining Larger Participants of the Automobile Financing Market and Defining Certain Automobile Leasing Activity as a Financial Product or Service Rule published on June 30, 2015.
<https://www.govinfo.gov/content/pkg/FR-2025-08-08/pdf/2025-15089.pdf>
- *Advanced Notice of Proposed Rulemaking: Defining Larger Participants of the International Money Transfer Market* (August 2025). The CFPB sought information to assist it in considering whether to propose a rule to amend the test to define larger participants in the international money transfer market established by the Bureau's Defining Larger Participants of the International Money Transfer Market Final Rule published on September 9, 2014.
<https://www.govinfo.gov/content/pkg/FR-2025-08-08/pdf/2025-15090.pdf>
- *Advanced Notice of Proposed Rulemaking: Defining Larger Participants of the Consumer Debt Collection Market* (August 2025). The CFPB sought information to assist it in considering whether to propose a rule to amend the test to define larger participants in the consumer debt collection market established by the CFPB's Defining Larger Participants of the Consumer Debt Collection Market Final Rule published on October 31, 2012.
<https://www.govinfo.gov/content/pkg/FR-2025-08-08/pdf/2025-15091.pdf>

5.1.5 Annual threshold rules

Each year, the CFPB makes adjustments to certain dollar amounts in its regulations based on Consumer Price Index changes pursuant to statutes and regulations. The CFPB adopted the following annual threshold adjustment rules during this reporting period:

- *Fair Credit Reporting Act Disclosures* (December 2025). The CFPB amended an appendix to Regulation V, which implements the Fair Credit Reporting Act (FCRA), adjusting the dollar amount of the maximum allowable charge for disclosures by a consumer reporting agency to a consumer. Based on the Consumer Price Index for All Urban Consumers (CPI-U), the maximum allowable charge is \$16.00 for 2026. <https://www.govinfo.gov/content/pkg/FR-2025-12-15/pdf/2025-22772.pdf>
- *Truth in Lending (Regulation Z) Annual Threshold Adjustments (Credit Cards, HOEPA, and Qualified Mortgages)* (December 2025). The CFPB amended regulation text and official interpretations for Regulation Z to adjust threshold dollar amounts for certain provisions impacting loans covered by the Home Ownership and Equity Protection Act of 1994 (HOEPA) and qualified mortgages. <https://www.govinfo.gov/content/pkg/FR-2025-12-15/pdf/2025-22773.pdf>
- *Truth in Lending (Regulation Z)* (December 2025). The CFPB and the Board of Governors of the Federal Reserve System (Board) finalized amendments to the official interpretations for the agencies' regulations that implement TILA, adjusting the dollar threshold for exempt consumer credit transactions by the annual percentage increase in the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W). Based on the annual percentage increase in the CPI-W as of June 1, 2025, the exemption threshold increased from \$71,900 to \$73,400, effective January 1, 2026. <https://www.govinfo.gov/content/pkg/FR-2025-12-15/pdf/2025-22814.pdf>
- *Consumer Leasing (Regulation M)* (December 2025). The CFPB and the Board finalized amendments to the official interpretations for the agencies' regulations that implement the Consumer Leasing Act (CLA), adjusting the dollar threshold for exempt consumer leases by the annual percentage increase in the CPI-W. Based on the annual percentage increase in the CPI-W as of June 1, 2025, the exemption threshold increased from \$71,900 to \$73,400, effective January 1, 2026. <https://www.govinfo.gov/content/pkg/FR-2025-12-15/pdf/2025-22813.pdf>
- *Appraisals for Higher-Priced Mortgage Loans Exemption Threshold* (December 2025). The CFPB, the Office of the Comptroller of the Currency (OCC), and the Board finalized amendments to the official interpretations for their regulations that implement section 129H of TILA, which establishes special appraisal requirements for “higher-risk mortgages,” termed “higher-priced mortgage loans” or “HPMLs” in the agencies’

regulations. Based on the CPI-W in effect as of June 1, 2025, the exemption threshold increased from \$33,500 to \$34,200, effective January 1, 2026.

<https://www.govinfo.gov/content/pkg/FR-2025-12-16/pdf/2025-22875.pdf>

- *Home Mortgage Disclosure (Regulation C) Adjustment to Asset-Size Exemption Threshold* (January 2026) The CFPB amended official commentary interpreting requirements of the Bureau's Regulation C to reflect the asset-size exemption threshold for banks, savings associations, and credit unions based on the annual percentage change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W). Based on the 2.5 average percent increase in the CPI-W for the 12-month period ending November 2025, the exemption threshold was adjusted to \$59 million from \$58 million. Institutions with assets of \$59 million or less as of December 31, 2025, are exempt from collecting data in 2026.
<https://www.govinfo.gov/content/pkg/FR-2026-01-07/pdf/2026-00087.pdf>
- *Truth in Lending Act (Regulation Z) Adjustment to Asset-Size Exemption Threshold* (January 2026). The CFPB amended the official commentary to its Regulation Z in order to make annual adjustments to the asset-size thresholds exempting certain creditors from the requirement to establish an escrow account for a higher-priced mortgage loan (HPML). The exemption threshold for creditors and their affiliates that regularly extended covered transactions secured by first liens was adjusted to \$2.785 billion and the exemption threshold for certain insured depository institutions and insured credit unions with assets of \$10 billion or less was adjusted to \$12.485 billion.
<https://www.govinfo.gov/content/pkg/FR-2026-01-07/pdf/2026-00085.pdf>

5.2 Significant initiatives, and reports adopted

This section highlights significant initiatives undertaken by the CFPB to fulfill the Bureau's statutory obligations and priorities between July 1, 2025, and June 30, 2026.

5.2.1 Significant initiatives

As discussed above, the Bureau focused its regulatory attention on streamlining existing regulations and eliminating unjustified regulatory burdens. The Bureau has also reviewed its regulations for consistency with law and the administration's policies and priorities. In addition, as described below, the Bureau has undertaken other significant initiatives to meet then-Acting Director Vought's deregulatory and other priorities. With respect to regulations, the Bureau issued a statement on Ability to Repay and Immigration Status. The CFPB also took actions to facilitate access to innovation, support servicemembers and their families, and improve the financial literacy of older Americans. Consistent with the administration's policies, the CFPB also took action to comply with all applicable executive orders and guidance.

- *Statement: Statement on Ability to Repay and Immigration Status* (June 2026). Continued access to employment can be a key component of assessing a borrower’s income. A borrower’s income and indications of a change to that income are often critical to reasonably assessing a borrower’s ability to repay before offering mortgages and certain open-end credit products. The CFPB issued this statement to remind creditors of their obligations under the Truth in Lending Act (TILA) as implemented by Regulation Z, and consistent with Executive Order 14406, titled “Restoring Integrity to America's Financial System.”
<https://www.govinfo.gov/content/pkg/FR-2026-06-08/pdf/2026-11447.pdf>

Facilitating Access to Innovation. The CFPB engaged in activities to understand potential regulatory barriers to the development of beneficial home loan products.

- *Trial Disclosure: Independent Community Bankers of America Trial Disclosure Program Waiver Template.* Under the CFPB Trial Disclosure Program Policy, the Independent Community Bankers of America (ICBA) asked to test a disclosure template with certain adjustments to the existing mortgage disclosures specifically designed for construction and construction-to-permanent loans. ICBA has indicated to the CFPB that the modified forms have the potential to address housing affordability, support consumers through greater clarity about the loan process, and streamline the loan process for community lenders. In January 2026, the CFPB published a Federal Register notice to solicit public comments on the testing. CFPB staff also submitted information to the Office of Management and Budget (OMB) regarding the research methodology of the ICBA testing. In March 2026, OMB approved the disclosure testing.
<https://www.federalregister.gov/documents/2026/01/21/2026-01086/agency-information-collection-activities-comment-request>
- *Technology Sprint Project: Increasing Access to Small Dollar Loans in Rural America.* During March to July 2026, the CFPB participated in the Census Bureau’s Opportunity Project with the challenge to “[u]se data and technology to improve access to credit and reduce the origination cost of small dollar loans (<\$150k) to help Americans in communities achieve homeownership and meet other housing-related needs.”
<https://opportunity.census.gov/assets/files/2025-cfpb.pdf>

Servicemember Engagement and Outreach: The CFPB engaged with federal, state, and local agencies and performed educational outreach in support of statutory requirements to educate and empower servicemembers and their families to make better informed decisions regarding consumer financial products and services.

- *Interagency coordination.* CFPB staff coordinate with federal and state agencies and organizations including, for example, the Department of Defense (DoD), Department of

Veterans Affairs (VA), DOJ, Federal Trade Commission and the National Association of Attorney Generals to monitor emerging financial risks, address violations of the Servicemember Civil Relief Act and Military Lending Act, and to coordinate educational initiatives.

- *Transition Assistance Program Interagency Curriculum Working Group.* CFPB staff participate in a working group led by DoD, VA, and Department of Labor with participation from several other federal agencies. The program bolsters opportunities, services, and training for transitioning servicemembers in their preparation to meet post-military goals. The working group is responsible for designing, evaluating, and standardizing the Transition Assistance Program curriculum for transitioning servicemembers.
<https://www.dodtap.mil/dodtap/app/home>
- *CFPB Military Legal Assistance Working Group.* In March and June 2026, the CFPB hosted its quarterly meetings of the Military Legal Assistance Working Group with the military service chiefs of legal assistance and legal assistance office attorneys, counsel from the National Guard Bureau, military JAG school professors, and attorneys from the DOJ's Civil Rights Division, Servicemember and Veterans Initiative. The goal of the working group is to achieve a coordinated response to unlawful conduct targeting servicemembers and their families.
- *Joint Base Anacostia-Bolling Training.* In January 2026, CFPB staff provided military consumer law and CFPB resources training, with an emphasis on the Military Lending Act, to military and civilian legal staff assigned to Joint Base Anacostia-Bolling (DC).
- *Naval Justice School Basic Lawyer Course.* In January 2026 and May 2026, CFPB staff trained Navy, Marine Corps, and Coast Guard judge advocates on key consumer protection statutes that are commonly used in military legal assistance, with an emphasis on the Military Lending Act. The training included information on resources available to military legal assistance attorneys, including CFPB resources.
- *Naval Reserve Judge Advocate Legal Assistance-Core Competency Training.* In March 2026, CFPB staff provided military consumer law training to Naval reserve judge advocates as part of its core competency training.
- *Joint Base Anacostia-Bolling.* In March 2026, CFPB staff provided military consumer law training, with an emphasis on debt collection, to military and civilian legal staff assigned to Joint Base Anacostia-Bolling (DC).

- *New York State Attorney General's Military and Veterans Group.* In May 2026, CFPB staff provided training on military consumer law, with specific emphasis on the Military Lending Act.
- *Joint Base Anacostia-Bolling Military Family Readiness Center Engagement:* In June 2026, CFPB staff met with the readiness center staff at Joint Base Anacostia-Bolling to coordinate plans for future financial education initiatives, including participating in upcoming events supporting servicemembers and military families with homebuying, auto financing, access to credit, and debt management.
- *Updated CFPB Servicemember and Veteran Webpage:* In June 2026, CFPB staff refreshed the Servicemember and Veteran webpage to update content and improve accessibility, readability, and navigation, of financial education resources, consumer rights information, and complaint submission guidance.
<https://www.consumerfinance.gov/consumer-tools/educator-tools/servicemembers/>

Outreach to Prevent Exploitation of Older Americans. The CFPB offered training and informational webinars in support of statutory requirements to provide financial education to specific populations, including older adults.

- *Leisure World of Maryland Financial Fraud Fair.* In March 2026, along with federal, state, and local aging and law enforcement agencies and AARP, CFPB staff participated in an outreach event on elder financial exploitation and scam prevention for older adults at Leisure World of Maryland, a senior living community.
- *American Bankers Association Webinar.* In June 2026, CFPB staff presented at a webinar hosted by the American Bankers Association Foundation to explain the data and a technical report from the CFPB's National Age-Friendly Banking Survey to learn about the banking experiences of older adults and people of all ages, including their experiences with fraud.
- *Older Adult Wealth Loss Roundtable.* In June 2026, CFPB, AARP, Massachusetts Institute of Technology AgeLab, and the U.S. Securities and Exchange Commission (SEC) co-hosted a roundtable on older adult wealth loss that occurs before a dementia diagnosis. The audience included federal and state financial regulators as well as representatives of state aging services agencies.
- *Money Smart for Older Adults (MSOA) Webinar.* In June 2026, the CFPB, Federal Deposit Insurance Corporation, and SEC provided a webinar on how to use MSOA

materials for elder fraud prevention. The webinar was part of the Elder Justice Coordinating Council's World Elder Abuse Awareness Day webinar series.

- *Updated CFPB Older Americans Webpage.* In June 2026, CFPB staff refreshed the Older Americans Website webpage to provide updated content and improve accessibility, readability, and navigation.
<https://www.consumerfinance.gov/olderamericans>

Office of Older Americans Committee Meetings during January to June 2026. As a committee member, CFPB staff attended the following committee meetings contributing expertise on the financial security and financial caregiving of older adults, including the prevention of financial exploitation.

- *Interagency Coordinating Committee on Healthy Aging and Age-Friendly Communities.* Authorized by the Older Americans Act, the Coordinating Committee supports federal coordination on aging-related priorities.
<https://acl.gov/ICC-Aging>
- *Supporting Grandparents Raising Grandchildren (SGRG) Advisory Council.* The SGRG Act established a federal Advisory Council to identify, promote, and coordinate resources for grandparents and kinship caregivers.
<https://acl.gov/programs/support-caregivers/supporting-grandparents-raising-grandchildren-0>
- *Recognize, Assist, Include, Support, & Engage (RAISE) Family Caregivers Advisory Council.* Under the RAISE Family Caregivers Act, the Secretary of Health and Human Services develops a national family caregiving strategy.
<https://acl.gov/programs/support-caregivers/raise-family-caregiving-advisory-council>
- *American Society on Aging Economic Security Advisory Council.* The Council addresses policies and programs to improve economic security for older adults and assure a dignified old age.
<https://asaging.org/about/>

Elder Justice Coordinating Council (EJCC). The EJCC was established through the Elder Justice Act and coordinates activities related to elder abuse, neglect, and exploitation across the federal government. The statute further provides for inclusion as Council members representatives from each federal department, agency, or governmental entity identified as administering programs related to abuse, neglect, or financial exploitation, including the CFPB. CFPB leadership and staff participate in the EJCC's Elder Justice

Working Group.

<https://ejcc.acl.gov/home>

Executive Action Implementation. The CFPB has continued addressing all applicable executive orders, Presidential memoranda, and other memoranda. To date, there have been 52 executive orders and associated guidance and 40 stand-alone executive actions that required action from the CFPB. As of this report, CFPB has completed all requirements for 30 executive orders (including 108 individual requirements) and 27 stand-alone executive actions (including 56 individual requirements). It should be noted that requirements for executive orders are dynamic and have deadlines beyond the date of this report as well as supplemental guidance issued at later dates that require additional new actions.

FY 2026 – FY 2030 Strategic Plan. In April 2026, the CFPB released its Strategic Plan for FY 2026 – FY 2030. The plan, required under the GPRA Modernization Act of 2010, presents the goals the Bureau aims to achieve, what actions and strategies the Bureau will take to realize those goals, and how the Bureau will deal with challenges and risks that may arise. The plan outlines three primary goals: (i) addressing pressing threats to consumers; (ii) reducing unwarranted regulatory burdens; and (iii) strengthening governance and culture. The full framework of goals, objectives, and strategies can be viewed on the Strategic Plan page on the CFPB website. <https://www.consumerfinance.gov/about-us/budget-strategy/strategic-plan/>

5.2.2 Significant reports

The CFPB continues to make strides in improving the rigor and transparency of its research in fulfillment of Executive Order 14303, entitled “Restoring Gold Standard Science.” For example, the CFPB updated and released data and reports supporting the Gold Standard Science tenets of reproducibility and transparency.

During the reporting period, the CFPB published the following significant reports and data releases:

- *Data Release: Making Ends Meet Survey Data.* In August 2025, the CFPB released a public use file of survey data from the Making Ends Meet survey from 2019 through 2025. The Making Ends Meet Survey program is a series of general financial surveys that examine consumers’ evolving financial status. The CFPB uses these surveys to produce reports on consumers’ financial conditions. The surveys cover financial decision-making, perceptions, expectations, well-being, marketing and usage of different consumer finance products.

<https://www.consumerfinance.gov/data-research/making-ends-meet-survey-data/>

- *Report on Actions Taken to Implement Gold Standard Science.* In August 2025, the CFPB published a report that describes the development of procedures and progress toward adopting policies to implement the May 2025, Executive Order 14303, entitled “Restoring Gold Standard Science.” Pursuant to the Executive Order, the White House Office of Science and Technology Policy (OSTP) Director issued guidance to federal agencies on incorporating Gold Standard Science tenets into their scientific research activities. The guidance required federal agencies to submit to OSTP and publish on their websites a report on how the agencies plan to implement the Gold Standard Science requirements. The CFPB is committed to the principles of Gold Standard Science and to fulfilling these principles by developing a policy to ensure that the CFPB adheres to these directives.
https://files.consumerfinance.gov/f/documents/cfpb_gold-standard-science_report_2025-08.pdf
- *Report: Office of Minority and Women Inclusion Annual Report to Congress.* In November 2025, the CFPB published the FY 2024 annual report that summarized its efforts to recruit, hire, and retain the highest quality workforce. The report also highlighted the agency’s efforts to ensure equality and fairness in business practices. See *supra*-Section 1 for a full description of the Office of Minority and Women Inclusion’s activities.https://files.consumerfinance.gov/f/documents/cfpb_fy2024-omwi-annual-report-to-congress_2025-11.pdf
- *Report: Fair Debt Collection Practices Act CFPB Annual Report 2025.* In November 2025, the CFPB published its annual report to Congress that included a summary of the CFPB’s activities to administer the Fair Debt Collection Practices Act in 2024.
https://files.consumerfinance.gov/f/documents/cfpb_fdcpa-2025-annual-report_2025-11.pdf
- *Report: Fair Lending Report of the Consumer Financial Protection Bureau for 2024.* In December 2025, the CFPB published an annual report that satisfies three statutorily imposed reporting requirements related to the CFPB’s fair lending program. Since 2024, the CFPB’s fair lending work has shifted significantly to better align with the current administration’s priorities. For information about the CFPB’s more recent fair lending efforts, see Section 5.
https://files.consumerfinance.gov/f/documents/cfpb_fy2024-omwi-annual-report-to-congress_2025-11.pdf
- *Data Spotlight: The Buy Now, Pay Later Market.* In December 2025, the CFPB published a report that examined trends in the BNPL market for calendar years 2019 to 2023. The market for BNPL credit, typically a four-payment loan with no interest used by

consumers to make retail purchases, continues to expand.

https://files.consumerfinance.gov/f/documents/cfpb_bnpl-market-report_2025-12.pdf

- *Data Release and Q&A: Terms of Credit Card Plans Survey.* In December 2025, the CFPB released updated data covering January 1, 2025, through June 20, 2025, and published a technical Q&A that is intended to be informative for users of the survey data.
<https://www.consumerfinance.gov/data-research/credit-card-data/terms-credit-card-plans-survey/>
- *Report: The Consumer Credit Card Market.* In December 2025, the CFPB published a biennial review of the consumer credit card market as directed by the Credit Card Accountability Responsibility and Disclosure Act.
https://files.consumerfinance.gov/f/documents/cfpb_consumer-credit-card-market-report_2025.pdf
- *Report: College Credit Card Agreements.* In December 2025, the CFPB published an annual report with credit card agreements and data required by the Credit Card Accountability, Responsibility, and Disclosure Act. The report includes information regarding agreements between credit card issuers and institutions of higher education or certain affiliated organizations, such as an alumni organization. The data in the report were compiled from submissions to the CFPB from credit card issuers.
https://files.consumerfinance.gov/f/documents/cfpb_college-credit-card-agreements-report_2025-12.pdf
- *Report: Annual Report of Credit and Consumer Reporting Complaints.* In December 2025, the CFPB published a report that summarizes information gathered by the CFPB regarding certain consumer complaints transmitted by the CFPB to Equifax, Experian, and TransUnion.
https://files.consumerfinance.gov/f/documents/cfpb_fcra-611e-report_2025-12.pdf
- *Report: Financial Literacy Annual Report.* In December 2025, the CFPB published an annual report about the CFPB's financial literacy activities and strategy to improve the financial literacy of consumers. The report included information about the need for youth financial education and how the CFPB supports those programs.
https://files.consumerfinance.gov/f/documents/cfpb_2024-financial-literacy-annual-report_2025-12.pdf
- *Report: 2025 Private Education Loan Ombudsman Report.* In January 2026, the CFPB published a report that analyzed student loan complaints and issues particularly with respect to timely responses, fraud, scams, information asymmetry, and consumer education.

https://files.consumerfinance.gov/f/documents/cfpb_pelo-annual-report_2026-01.pdf

- *Report: FY 2024 Annual Performance Report.* In January 2026, the CFPB published a report that summarizes CFPB’s progress in implementing the strategies and achieving the goals and objectives developed under former director Chopra, as described in the CFPB’s Strategic Plan for FY 2022-2026, for the period of October 1, 2023 - September 30, 2024. https://files.consumerfinance.gov/f/documents/cfpb_annual-performance-report_fy24.pdf
- *Notice and Request for Comment: Report of Terms of Credit Card Plans and Consumer and College Credit Card Agreements.* In February 2026, the CFPB published a Federal Register notice and request for comment on three credit card data collections: the Terms of Credit Card Plans Survey; the Credit Card Quarterly Agreement Submission; and College Credit Card Annual Agreement Submission. <https://www.federalregister.gov/documents/2026/02/06/2026-02456/agency-information-collection-activities-comment-request>
- *Data Release and Technical Report: National Age-Friendly Banking Survey.* In March 2026, the CFPB released data from the CFPB Age-Friendly Banking dataset and technical report. The nationally representative survey was fielded to improve understanding of consumers’ experiences with banks and credit unions. <https://www.consumerfinance.gov/data-research/national-age-friendly-banking-survey-data/>
- *Report: No FEAR Act Annual Report for fiscal year 2025.* In March 2026, the CFPB published a report that summarizes the CFPB’s EEO complaint activity, the most significant accomplishments in our EEO program, our strong commitment to abide by civil rights and whistleblower protection laws and merit systems principles, and to promote accountability. https://files.consumerfinance.gov/f/documents/cfpb_no-fear-act_annual-report_fy-2025.pdf
- *Report: 2025 Consumer Response Annual Report.* In March 2026, the CFPB published a report that analyzed complaints submitted by consumers to the CFPB between January and December 2025. https://files.consumerfinance.gov/f/documents/cfpb_2025-cr-annual-report_2026-03.pdf
- *Report: Debt Burdens Among Credit-Linked Consumers in the United States*
In April 2026, the CFPB published a report that documents how often consumers share credit with likely-household members, what types of credit they share, and what we might miss by focusing solely on individuals. The report shows that credit-linked consumers (a household-like construct the authors define) generally have better financial

outcomes than consumers who are unlinked, even when comparing consumers who have similar types of credit.

<https://www.consumerfinance.gov/data-research/research-reports/debt-burdens-among-credit-linked-consumers-in-the-united-states/>

- *Report: Equal Employment Opportunity Status Report.* In April 2026, the CFPB published a status report known as Management Directive 715 (MD-715).
https://files.consumerfinance.gov/f/documents/cfpb_md-715-report-fy2025_2026-04.pdf
- *Report: Executive Order 14294 Report: Criminal Regulatory Offenses.* In May 2026, the CFPB issued a report to the Office of Management and Budget listing criminal regulatory offenses enforceable by the CFPB or the DOJ.
https://files.consumerfinance.gov/f/documents/cfpb_eo-14294-report-omb_2026-05.pdf
- *Report: Financial Literacy Annual Report.* In May 2026, the CFPB published a report that summarized the CFPB’s financial education priorities.
https://files.consumerfinance.gov/f/documents/cfpb_flar-2025-report_2026-05.pdf
- *Data Release: Terms of Credit Card Plans Survey.* In June 2026, the CFPB released updated data covering July 1, 2025, through December 31, 2025.
<https://www.consumerfinance.gov/data-research/credit-card-data/terms-credit-card-plans-survey/>
- *Data Release: Credit Card Agreements.* In June 2026, the CFPB updated its repository of credit card agreements with data covering agreements first offered, amended, or withdrawn between January 1, 2026, and March 31, 2026.
<https://www.consumerfinance.gov/credit-cards/agreements/>

5.3 Upcoming plan for rules, orders, and other initiatives

5.3.1 Rules and orders

The CFPB continues to work on a number of deregulatory actions, including several of the regulatory priorities discussed in Section 5.1 of this report. These priorities include the reconsideration of the Personal Financial Data Rights rulemaking, as well as potential rulemakings guided by Executive Order 14393, titled “Promoting Access to Mortgage Credit.” The Bureau is also working on a proposed rule to reconsider the remaining provisions of the CFPB’s 2017 Payday, Vehicle Title, and Certain High-Cost Installment Loans rule. The Bureau also expects to continue working on a number of other rulemaking projects. For additional information on the CFPB’s current deregulatory agenda, see the Bureau’s Unified Agenda available at <https://www.reginfo.gov/public/do/eAgendaMain>.

In addition, the Bureau is working on the following:

- *Request for Information Regarding Promoting Access to Mortgage Credit* (July 2026). The Bureau issued an RFI seeking to reduce unwarranted regulatory burdens to ensure that creditworthy borrowers can access mortgage credit. Specifically, the CFPB requested information on industry and consumer burdens related to the integrated mortgage disclosures under the TRID rules, the right of rescission, and reverse mortgage disclosures.

5.3.2 Other initiatives

The Consumer Advisory Board (CAB) advises and consults with the Bureau on the exercise of its functions under the Federal Consumer Financial Laws and provides information on emerging practices in the consumer financial products or services industry, including regional trends, concerns, and other relevant information. By way of public meetings, the CAB may meet from time to time at the call of the Director, but, at a minimum, shall meet at least twice each year. For public meetings taking place in 2026, the CAB will focus on topics that further the goals of the Bureau's FY 2026-2030 Strategic Plan. The CAB will generally serve as a vehicle for trends and themes in the consumer financial marketplace for the Bureau. Its objectives would include identifying the impact on consumers and other market participants of new, emerging, and changing products, practices, or services, as outlined by specific topics that would be included in the meeting agendas at the direction of the Bureau's Director.

6. State consumer financial law

For purposes of the 12 U.S.C. § 5496 reporting requirement, the CFPB has determined that any actions asserting claims pursuant to 12 U.S.C. § 5552 are “significant.”

The CFPB has been apprised of the following developments in pending state attorney general and regulatory actions asserting claims under 12 U.S.C. § 5552 during the reporting period of January 1, 2026 – June 30, 2026, which are listed in descending chronological order by initial filing date.

- *The People of the State of New York, by Attorney General Letitia James; the Commonwealth of Pennsylvania, by Attorney General David W. Sunday, Jr.; State of Colorado, ex rel. General Phillip J. Weiser, Attorney General, and Martha Fulford, Administrator; Maryland Office of the Attorney General; State of Nevada; State of New Hampshire; State of New Jersey, by Attorney General Jennifer Davenport; State of North Dakota ex rel. Drew H. Wrigley, Attorney General; State of Oklahoma; State of South Dakota; Commonwealth of Virginia, ex rel. Jay Jones, Attorney General; State of Washington; and State of Wisconsin; v. OneMain Holdings, Inc.; OneMain Finance Corporation; OneMain Consumer Loan, Inc.; OneMain Financial Holdings, LLC; OneMain Financial Group, LLC; OneMain Financial, Inc.* (S.D.N.Y No. 1:26-cv-2117). On March 16, 2026, the attorneys general of New York, Pennsylvania, Colorado, Maryland, Nevada, New Hampshire, New Jersey, North Dakota, Oklahoma, South Dakota, Virginia, Washington, and Wisconsin sued subprime lender OneMain and its affiliates alleging that they surreptitiously charge consumers hundreds or thousands of dollars for insurance policies and other add-on products, and that OneMain often compounds the harm it causes in closing the initial loans when it refinances those loans. The complaint alleges that these actions violate the Truth in Lending Act (TILA) and its implementing regulation, Regulation Z, and the Consumer Financial Protection Act of 2010’s (CFPA) prohibitions against unfair, deceptive, and abusive acts or practices.
- *State of Minnesota, by its Attorney General, Keith Ellison, Plaintiff, v. Ian Stamper-Windy Boy, in his official capacity as Chief Operations Officer of Plain Green, LLC, and James Rader, in his official capacity as Director of Operations of Plain Green, LLC* (D. Minn. No. 26-cv-01840). On March 12, 2026, The Minnesota Attorney general sued two executives of Plain Green, LLC, an online lender controlled and operated by the Chippewa Cree Tribe through its subsidiary Atoske Holding Company. Minnesota alleges defendants, who determined policies and operations of Plain Green’s lending, made usurious loans to Minnesota consumers while deceptively and unfairly claiming their business was immune to Minnesota law. Minnesota alleges that defendants’ practices violate the CFPA’s prohibitions against unfair and deceptive practices.

- *Commonwealth of Virginia, ex rel. Jay Jones, Attorney General, v. William Jayson Waller, Kevin Anthony Klink, Cross River Bank, a New Jersey-chartered bank Fifth Third Bank, a National Association, Goodleap, LLC, a California limited liability company Solar Mosaic, LLC, a California limited liability company, Sunlight Financial, LLC, a Delaware limited liability company and Technology Credit Union, a California-chartered Credit Union* (E.D. Va.No. 3:26-cv-00039). On January 16, 2026, the Virginia Attorney General sued defendants alleging that they deceived over 4,000 consumers into taking out over \$200 million in loans to purchase high-priced solar systems. The Attorney General also alleges that the defendants charged hidden loan fees of five to twenty-eight percent, claiming that they were part of the solar systems costs when they were not. The complaint alleges that these actions violated TILA, Regulation Z, and the CFPA’s prohibition against deceptive practices.
- *The People of the State of New York, by Letitia James, Attorney General of the State of New York, v. Capital One, N.A. and Capital One Financial Corporation* (S.D.N.Y. No. 1:25-cv-04037). On May 14, 2025, the New York Attorney General sued Capital One, N.A. and Capital One Financial Corporation. The complaint alleges that defendants’ marketing of its “360 Performance Savings” violated the Truth in Savings Act, and Regulation DD, and the CFPA’s prohibitions against deceptive and abusive practices, and various provisions of New York’s General Business Law. On January 12, 2026, the attorney general voluntarily agreed to dismiss her action upon settlement of a class action settlement covering defendants’ marketing of its “360 Performance Savings” accounts.
- *People of the State of New York, by Letitia James, Attorney General of the State of New York, v. MoneyLion Inc.* (N.Y. Sup. Ct. No. 451303/2025). On April 14, 2025, the New York Attorney General sued MoneyLion Inc. The complaint alleges that defendant markets small-dollar, short-term, high-cost loans as free products that charge zero percent interest, while defendant’s processes and algorithms drive consumers into fee-based options and pressure them for “tips.” New York asserts that these charges constitute interest with APRs in excess of 500 percent. The Attorney General alleges that these practices violate the CFPA’s prohibitions against deceptive and abusive practices, as well as New York usury and fraud laws. As of the end of the reporting period, the case remains pending.
- *Commonwealth of Pennsylvania, by Attorney General Michelle A. Henry, v. Bright Financial Group, LLC et al.* (E.D. Pa. No. 2:25-cv-00301). On January 17, 2025, the Pennsylvania Attorney General sued Bright Financial Group, LLC, Conquest Mortgage, LLC, Flagship Home Loans, LLC, Legacy Mortgage Partners, LLC, Nittany Home Loans, LLC, MCT Financial, LLC, Barry Newhart, Newhart Holdings, LLC, and Conquest Holdings, LLC. The complaint alleges that defendants give things of value in exchange for referrals of business. The Attorney General alleges that these actions

violated Section 8(a) of Real Estate Settlement Procedures Act and Pennsylvania's consumer protection law. As of the end of the reporting period, the case remains pending.

- *Commonwealth of Pennsylvania, by Attorney General Michelle A. Henry v. Eagle Rock Resort Co., LLC, United Equitable Mortgage Corporation, Eagle Rock Real Estate Co., and Double Diamond – Delaware, Inc.* (M.D. Pa. No. 4:02-at-06000). On January 9, 2025, the Pennsylvania Attorney General sued Eagle Rock Resort Co., LLC, Eagle Rock Real Estate Co., and Double Diamond – Delaware, Inc. The complaint alleges that defendants deceptively sell unimproved lots through high pressure sales tactics in violation of the Interstate Land Sales Full Disclosure Act of 1968 (ILSA), the CFPA's prohibitions against unfair, abusive, and deceptive practices, and Pennsylvania's consumer protection law. As of the end of the reporting period, the case remains pending.
- *State of Minnesota, by its Attorney General, Keith Ellison v. Chadwick Banken, Slow Flip, LLC, Banken Holdings, LLC, BCC Holdings, LLC, Flip Funding, LLC, Slow Jewels, LLC, and Front Flip Funding, LLC* (Minn. Dist. Ct. No. 27-CV-24-780). On May 14, 2024, the Minnesota Attorney General sued realtor Chadwick Banken and a variety of businesses he owns, alleging that they sell houses via illegal contracts for deed, use deceptive trade practices to market their contracts for deed, and discriminate by offering unfair terms to Muslim purchasers. The attorney general alleges that these practices violate TILA's disclosure requirements, the CFPA's prohibitions against unfair, abusive, and deceptive practices, and Minnesota's consumer protection and human rights statutes. On June 22, 2026, a jury found defendant Banken liable for the Attorney General's CFPA claims. The verdict, however, was advisory. As of the end of the reporting period, the case remains pending as the court reviews the jury's findings and rules on the CFPA claims at a later date.
- *State of Texas, v. Colony Ridge, Inc.; Colony Ridge Development, LLC; Colony Ridge BV, LLC; Colony Ridge Land, LLC; T-Rex Management, Inc.; John Harris; and Houston El Norte Property Owners' Association, Inc.* (S.D. Tex. No. 4:24-cv-00941). On March 14, 2024, the Texas Attorney General sued defendants for allegedly targeting foreign born and Hispanic consumers with limited or no access to credit with promises of cheap, ready to build land and financing without proof of income. The Attorney General alleges that defendants misrepresented conditions that buyers would experience on the property and then churned purchasers through a foreclosure mill. The complaint also alleges that defendants' operation violates the CFPA's prohibitions against deceptive practices, ILSA, and Texas' deceptive sales practice laws. On February 10, 2026, the State of Texas notified the court in a joint motion for dismissal that the State of Texas, along with the DOJ had reached a settlement resolving the State of Texas's claims and the DOJ's claims in a related matter. On April 28, 2026, the court dismissed the action with prejudice, declining to maintain jurisdiction to enforce the settlement.

- *Consumer Financial Protection Bureau, New York, Colorado, Delaware, Illinois, Minnesota, North Carolina, and Wisconsin v. StratFS, LLC (f/k/a Strategic Financial Solutions, LLC) et al.* (W.D.N.Y. No. 1:24-cv-00040). On January 10, 2024, the CFPB and seven state attorneys general – New York, Colorado, Delaware, Illinois, Minnesota, North Carolina, and Wisconsin – filed a complaint and sought a temporary restraining order and preliminary injunction against StratFS, LLC f/k/a Strategic Financial Solutions, LLC, as well as its holding company Strategic Family, Inc.; various of its subsidiaries; and as individuals: SFS Chief Executive Officer Ryan Sasson and Jason Blust. The complaint also named the following relief defendants: Daniel Blumkin; Albert Ian Behar; Strategic ESOP; Strategic ESOT, Twist Financial, LLC; Duke Enterprises, LLC; Blaise Investments, LLC; The Blust Family Irrevocable Trust through Donald J. Holmgren, Trustee; Jaclyn Blust; Lit Def Strategies, LLC; and Relialit, LLC. *See supra* Section 4.4 for a full description. As of the end of the reporting period, the case remains pending.
- *State of Tennessee ex rel. Jonathan Skrmetti, et al. v. Ideal Horizon Benefits, LLC d/b/a Solar Titan USA, LLC, Craig Kelley, Richard Atnip, and Sarah Kirkland, and Solar Mosaic, LLC, Defendants, and Solar Titan Charters, LLC d/b/a Titan Charters* (E.D. Tenn. 3:23-cv-46). On February 6, 2023, the attorneys general of Tennessee and Kentucky sued Solar Titan, its principals, and Solar Mosaic, the company that provided financing to consumers for the purchase and installation of solar systems. The states allege that defendants made numerous misrepresentations in connection with the sale and financing of solar systems and that these practices have violated the CFPA’s prohibitions against unfair, abusive, and deceptive practices, as well as the states’ own consumer protection statutes. The attorneys general also allege that defendants have violated TILA’s disclosure and rescission requirements. As of the end of the reporting period, the case remains pending.
- *Consumer Financial Protection Bureau and the People of the State of New York, by Letitia James, the Attorney General of the State of New York v. Credit Acceptance Corporation* (S.D.N.Y. No. 1:23-cv-00038). On January 4, 2023, the CFPB and New York Attorney General sued Credit Acceptance Corporation, an indirect auto lender that funds and services car loans for subprime and deep-subprime consumers. On April 24, 2025, the CFPB filed a motion to withdraw as plaintiff in the case, which the court granted on April 29, 2025. On January 4, 2023, the CFPB and New York Attorney General Letitia James filed a joint lawsuit against Credit Acceptance Corporation, an indirect auto lender that funds and services car loans for subprime and deep-subprime consumers. The joint complaint alleged that Credit Acceptance violated the CFPA’s prohibition on deceptive and abusive acts and practices. On April 24, 2025, the CFPB filed a motion to withdraw as plaintiff in the case, which the court granted on April 29,

2025. On June 5, 2026, the court dismissed the case without prejudice based on the parties' report that all claims had been settled in principle.

- *Commonwealth of Pennsylvania, by Attorney General Josh Shapiro; District of Columbia, through the Office of the Attorney General; Matthew J. Platkin, Acting Attorney General of the State of New Jersey; State of Oregon, ex rel. Ellen F. Rosenblum, in her official capacity as Attorney General; State of Utah, by Attorney General Sean D. Reyes; and State of Washington v. Mariner Finance, LLC* (E.D. Pa. No. 2:22-cv-3253). On August 16, 2022, the attorneys general of Pennsylvania, the District of Columbia, New Jersey, Oregon, Utah, and Washington sued Mariner Finance, LLC, a subprime installment lender. The attorneys general allege that: (1) Mariner engages in unfair and deceptive acts and practices in violation of the CFPA by charging consumers for add-on products without obtaining their consent and by loan flipping; (2) the design and implementation of Mariner's loan closing process is abusive in violation of the CFPA; (3) Mariner engages in abusive acts and practices that take unreasonable advantage of a lack of consumers' understanding of the material risks, costs, or conditions of add-on products and by loan flipping in violation of the CFPA; (4) the disclosures Mariner provides to its customers fail to disclose accurate finance charges and annual percentage rates in violation of Regulation Z and the CFPA; and (5) Mariner fails to disclose to consumers the commission payments it retains and deducts from insurance premium payments paid to credit insurers in violation of TILA and the CFPA. The attorneys general of Pennsylvania, Washington, and New Jersey also allege that Mariner has violated their respective state consumer protection statutes. As of the end of the reporting period, the case remains pending.

7. Marketplace challenges

The challenges that consumers face in the marketplace highlight an important tenet of CFPB's statutory mission under 12 U.S.C. § 5511(a): to ensure that consumers have access to financial products and services and that markets are fair, transparent, and competitive. During the reporting period, the CFPB conducted research and reported on issues where consumers were faced with potential challenges shopping for or obtaining consumer financial products or services.

As listed above in Section 5.2.2, in April 2026, the CFPB released a report using consumer credit record data that examines how consumers share credit with likely household members, finding that consumers who share credit tend to have more positive information on their credit records (higher credit scores, lower credit card utilization, and lower rates of delinquency) than consumers who do not share credit in this manner.²⁵

²⁵ See <https://www.consumerfinance.gov/data-research/research-reports/debt-burdens-among-credit-linked-consumers-in-the-united-states/>

8. Fair workforce and business opportunities

The CFPB is obligated to include in this report “an analysis of the efforts of the Bureau to increase workforce and contracting diversity.”²⁶ Former Acting Director Vought expressed concerns regarding certain aspects of this reporting in light of the Supreme Court decision in *Students for Fair Admissions, Inc. v. President & Fellow of Harvard College*, 600 U.S. 181 (2023).²⁷ In that landmark ruling, the Supreme Court reaffirmed that “[d]istinctions between citizens solely because of their ancestry are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.” *Id.* at 2147 (citing *Rice v. Cayetano*, 528 U.S. 495, 517 (2000)). As Justice Thomas observed, “[i]t should be obvious that every racial classification helps, in a narrow sense, some races and hurts others.” *Id.* at 2199 (Thomas, J., conc.). Accordingly, “[c]lassifying” individuals based on their race “requires more than . . . an amorphous end to justify it.” *Id.* at 2166. Acting Director Paoletta shares these concerns.

Under the leadership of then-Acting Director Vought, the CFPB faithfully implemented Executive Order 14151, *Ending Radical and Wasteful Government DEI Programs and Preferencing*; Executive Order 14168, *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*; and Executive Order 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*. During this reporting period, the CFPB has successfully taken all necessary steps to implement these important Presidential Directives.

8.1 Increasing workforce fairness

Throughout this reporting period, the CFPB provided employees with disabilities access to reasonable accommodation and services required to perform essential job functions. The CFPB also continued its Rehabilitation Act Section 508 Information and Computer Technology program to ensure that the Bureau’s programs and services remain accessible to employees and the public as required by law.

8.2 Increasing contracting opportunities

The CFPB plans to publish its Office of Minority and Women Inclusion’s Annual Report to Congress which will include its dollars spent to all contractors as well as minority- and women-owned businesses. Finally, the CFPB continued to include the following clause in all new contracts: *Certification of Anti-Discrimination Laws*: The contractor shall comply with all applicable Federal anti-discrimination laws. This compliance is material to CFPB’s payment

²⁶ 12 U.S.C. § 5496(c)(9)

²⁷ [CFPB Semi-Annual Report](#) (Mar. 31, 2026) at 5.

decisions for purposes of section 3729(b)(4) of title 31, United States Code. Through acceptance and performance of this contract, the contractor certifies that it does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.

9. Budget justification

During Fiscal Year 2026, the CFPB has continued efforts to dramatically increase efficiency and reduce unnecessary spending throughout the agency while still meeting its mandates. The CFPB's funding transfer cap for FY 2026 is \$466,803,000. Spending through the end of the third quarter totaled \$312,375,117 and total transfers from the Federal Reserve System totaled \$220,800,000. The transfers reflect compliance with the preliminary injunction of the U.S. District Court for the District of Columbia in *NTEU vs. Vought*, 1:25-cv-00381.

9.1 CFPB spending through the end of the third quarter of the Fiscal Year

As of June 30, 2026, the end of the third quarter in FY 2026, the CFPB spent approximately \$312,375,117²⁸ to carry out the authorities of the CFPB under federal consumer financial law. There were 1,137 CFPB employees on board at the end of the third quarter.²⁹

FY 2026 spending by expense category:

Expense Category	Fiscal Year 2026
Personnel Compensation	\$183,979,988
Personnel Benefits	\$71,650,003
Benefits for Former Personnel	\$180,342
Travel	\$29,076
Transportation of Things	\$0
Rents, Communications, Utilities & Misc.	\$1,822,937
Printing and Reproduction	\$491,124
Other Contractual Services	\$43,046,188
Supplies & Materials	\$840,922

²⁸ This amount includes only new obligations and upward adjustments to previous year obligations in the Consumer Financial Protection Bureau Fund (Bureau Fund).

²⁹ This figure reflects the employees on board in pay period 12, ending June 27, 2026.

Expense Category	Fiscal Year 2026
Equipment	\$10,334,537
Land & Structures	\$0
Total	\$312,375,117

9.2 Fund transfers received from the Federal Reserve System

The CFPB is funded principally by transfers from the Federal Reserve System, up to the limits set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act.³⁰ As of June 30, 2026, the CFPB had received the following transfers for FY 2026. The amounts and dates of the transfers are shown below.

Date	Funds Transferred
January 13, 2026	\$145,000,000
April 1, 2026	\$75,800,000
Total	\$220,800,000

³⁰ CFPB's operations are funded principally by transfers made by the Board of Governors of the Federal Reserve System (Board) from the combined earnings of the Federal Reserve System, up to the limits set forth in 12 U.S.C. § 5497. The CFPB Director requests transfers from the Board in amounts that they have determined are reasonably necessary to carry out the CFPB's mission within the limits set forth in 12 U.S.C. § 5497. Transfers from the Board are capped at \$466.8 million in FY 2026. Funds transferred from the Board are deposited into the Consumer Financial Protection Bureau Fund (Bureau Fund), which is maintained at the Federal Reserve Bank of New York.

Appendix A: 2025 Annual Report to Congress on the Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act)

Background

The Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act)³¹ mandates a nationwide licensing system and registry for residential mortgage loan originators. It requires that State licensing and registration and federal registration of residential mortgage loan originators (MLOs) be accomplished through the same online system, known as the Nationwide Mortgage Licensing System and Registry (NMLS&R).³² The NMLS&R is operated by the State Regulatory Registry LLC (SRR), a wholly owned subsidiary of the Conference of State Bank Supervisors (CSBS). The statutory purposes of the SAFE Act generally include “increas[ing] uniformity, reduc[ing] regulatory burden, enhanc[ing] consumer protection, and reduc[ing] fraud....”³³

In July 2011, the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act)³⁴ transferred to the Consumer Financial Protection Bureau (Bureau) rulemaking authority, and other authorities, of the Board of Governors of the Federal Reserve System, the Comptroller of the Currency, the National Credit Union Administration, the Federal Deposit Insurance Corporation, and the Secretary of the Department of Housing and Urban Development for the SAFE Act. The Dodd-Frank also amended the SAFE Act itself.³⁵ As a result, among other things, the Bureau assumed the (1) responsibility for developing and maintaining the federal registration system; (2) supervisory and enforcement authority for SAFE Act compliance for applicable entities under the Bureau’s jurisdiction; (3) back-up and related authority relating to SAFE Act standards for MLO licensing systems at the state level; and (4) certain rulemaking authority. The Dodd-Frank Act also transferred to the Bureau the requirement to submit an

³¹ 12 U.S.C. § 5101 et seq.

³² The SAFE Act specifically defines “Nationwide Mortgage Licensing System & Registry” to mean “a mortgage licensing system developed and maintained by the Conference of State Bank Supervisors and the American Association of Residential Mortgage Regulators for the State licensing and registration of State-licensed loan originators and the registration of registered loan originators or any system established by the Director [of the Consumer Financial Protection Bureau] under [12 U.S.C. § 5108].”

³³ 12 U.S.C. § 5101.

³⁴ Pub. L. No. 111 -203 (July 21, 2010).

³⁵ See, e.g., section 1100 of the Dodd-Frank Act.

annual report to Congress on the effectiveness of the SAFE Act's provisions. This constitutes the annual SAFE Act report for 2025.

CFPB Administration of the SAFE Act in 2025

While administering the SAFE Act during 2025, the Bureau worked closely with SRR/CSBS to facilitate sharing MLO information between state and federal regulators through the NMLS&R. Officials from the Bureau and SRR/CSBS met regularly to discuss issues related to the operation of the NMLS&R, resolve issues, and discuss requirements and policies related to the administration and functions of the NMLS&R. The Bureau reviewed, and approved as applicable, NMLS&R record adjustment requests to correct inaccurate information on federal registrant accounts. It also responded to any Freedom of Information Act (FOIA) requests that pertained to federally registered MLOs. As of December 31, 2025, there were approximately 358,509 active federally registered MLOs in the NMLS&R.

The Bureau continues to receive SAFE Act-related questions through its regulations guidance function on its website and through a dedicated mailbox. Most of the inquiries seek information about MLO licensing and registration requirements. The Bureau also provides different forms of guidance and compliance resources on its website. The Bureau also continues to work with SRR/CSBS officials on inquiries associated with the use of the system.

The Bureau's interactions with SRR/CSBS and the public indicate that the system is meeting expectations and provides a comprehensive licensing and supervisory database. During 2025, all of the required state, territory, and D.C. regulators (state regulators) continued to use the NMLS&R for licensing their MLOs, as is mandated by the SAFE Act, as implemented in Regulation H. The NMLS&R continues to collect and maintain the information required by the SAFE Act, as implemented in Regulations G and H. Additionally, an online consumer portal is available at no charge to consumers to provide employment and publicly adjudicated disciplinary and enforcement history for MLOs consistent with the statutory objectives of the SAFE Act.

During 2025, SRR/CSBS continued to engage the Bureau on issues regarding the NMLS&R and the modernization of the NMLS&R. The desired outcome of the NMLS&R modernization effort is to improve its operations, enhance the user experience, and strengthen supervision. The Bureau continues to provide its feedback and position on current and proposed functions relating to the federal registration process for MLOs in the NMLS&R to SRR/CSBS.

Appendix B: Annual Report on the Truth in Lending Act, the Electronic Fund Transfer Act, and the Credit Card Accountability Responsibility and Disclosure Act

The Truth in Lending Act (TILA)³⁶ and the Electronic Fund Transfer Act (EFTA)³⁷ require the Consumer Financial Protection Bureau (CFPB) to make an annual report to Congress that includes a description of the administration of functions under TILA and EFTA, and an assessment of the extent to which compliance with TILA and EFTA has been achieved. In addition, the Credit Card Accountability Responsibility and Disclosure Act (CARD Act)³⁸ requires reporting on supervisory and enforcement activities with respect to compliance by credit card issuers with applicable federal consumer protection statutes and regulations.³⁹

This report provides the information required by TILA, EFTA, and the CARD Act for the period January 1, 2024 – December 31, 2025. This report describes the CFPB’s and other agencies’ enforcement efforts and required reimbursements to consumers by supervised institutions as they relate to TILA, EFTA, the CARD Act, and their respective implementing regulations, Regulation Z (for TILA and the CARD Act) and Regulation E (for EFTA). It also provides an assessment of the extent of compliance with the provisions of TILA, EFTA, and their implementing regulations.

TILA: Public enforcement actions and reimbursements

The purposes of TILA include: (1) to assure meaningful disclosure of credit terms so that the consumer will be able to compare more readily the various credit terms available and avoid the uninformed use of credit, and (2) to protect the consumer against inaccurate and unfair credit billing and credit card practices.⁴⁰

The enforcement efforts made, and reimbursements required by all the agencies assigned enforcement authority under TILA are discussed in this section.

³⁶ 15 U.S.C. § 1613.

³⁷ 15 U.S.C. § 1693p.

³⁸ 15 U.S.C. § 1616(e).

³⁹ In 2012, the Federal Reserve Board (Board) and the CFPB agreed that responsibility for the reporting period required by the CARD Act passed to the CFPB under the terms of the Consumer Financial Protection Act of 2010.

⁴⁰ 15 U.S.C. 1601(a).

The agencies charged with enforcement of TILA under 15 U.S.C. § 1607 include the:

- CFPB,
- Federal Deposit Insurance Corporation (FDIC),
- Federal Reserve Board (Board),
- National Credit Union Administration (NCUA),
- Office of the Comptroller of the Currency (OCC),
- Federal Trade Commission (FTC),⁴¹
- Department of Transportation (DOT),
- Farm Credit Administration (FCA), and
- Agricultural Marketing Service (AMS) of the U.S. Department of Agriculture (USDA).⁴²

During the reporting period of January 1, 2024, through December 31, 2025, the following agencies reported public enforcement actions under TILA, including:

⁴¹ The FTC enforcement action summaries in this report also include references to violations of the Consumer Leasing Act (CLA) and Regulation M. The CLA is an amendment to TILA. *See* 15 U.S.C. §§ 1667-1667f.

⁴² The Grain Inspection, Packers, and Stockyards Administration (GIPSA) was eliminated as a standalone agency within the USDA in 2017. The functions previously performed by GIPSA have been incorporated into the AMS, and TILA and EFTA reporting now comes from the Packers and Stockyards Division, Fair Trade Practices Program, AMS.

TABLE 1: 2024 AND 2025 PUBLIC ENFORCEMENT ACTIONS RELATED TO TILA

Agency	Summary
CFPB	In 2024, the CFPB: ▪ Issued an order against a bank for, among other things, failing to send acknowledgement notices and resolution letters within required periods; making adverse reports to consumer reporting agencies regarding amounts disputed in billing error notices prior to completing the requirements for billing error resolution; failing to conduct reasonable investigations for disputes that qualified as billing error notices; and holding consumers liable for amounts at issue in claims of unauthorized use before conducting a reasonable investigation; ▪ Obtained a stipulated final judgment to address, among other things, allegations of failing to disclose finance charges on loan documents and annual percentage rates on advertisements; and using the names, emblems, or logos of certain schools to imply that they endorsed loans; ▪ Issued an order, which the CFPB subsequently terminated, against a nonbank residential mortgage servicer for, among other things, disclosing, assessing, and collecting incorrect late fee amounts; ▪ Issued an order against a for-profit vocational school for, among other things, failing to disclose key facts about its financing agreements, such as the amount financed, finance charge, and annual percentage rate; and ▪ Filed two additional actions under TILA and Regulation Z that were dismissed with prejudice. In 2025, the CFPB filed one action under TILA and Regulation Z that was dismissed with prejudice.
DOT	In 2024, the Office of Aviation Consumer Protection (OACP) issued three consent orders with airlines for failure to provide prompt refunds to passengers for flights to and from the United States that were cancelled or significantly changed by the carrier. In each case, OACP found that the carrier’s failure to provide prompt refunds constituted a violation of 14 C.F.R. § 259.5, which incorporates certain requirements of Regulation Z, and 49 U.S.C. § 41712, a statutory prohibition against unfair or deceptive practices in air transportation or the sale of air transportation. In 2025, OACP issued DOT Order 2025-1-7, a consent order against Türk Hava Yollari, A.O. (Turkish Airlines), for failure to provide prompt refunds to

	passengers for flights to and from the United States that were cancelled or significantly changed by the carrier. OACP found that the carrier’s failure to provide prompt refunds constituted a violation of 14 C.F.R. § 259.5 and 49 U.S.C. § 41712.
FTC	In 2024, the FTC filed a complaint against and obtained a stipulated order in federal court with household water treatment financing company Aqua Finance. The complaint charged the defendant with numerous violations of federal laws, including, among others, the FTC Act and TILA and Regulation Z. The complaint alleged that Aqua Finance and its nationwide network of dealers used deceptive “teaser rates” and deferred payments to lure consumers into signing up for loans and failed to adequately disclose financing terms that impaired some consumers’ ability to sell their homes. The defendant allegedly failed to provide clear and conspicuous disclosures to consumers as required for closed-end transactions, including the amount financed; finance charge; annual percentage rate; number, amounts, and timing of payments scheduled to repay the obligation; and total of payments, in violation of TILA and Regulation Z. In 2024, litigation continued at the appellate level against Traffic Jam Events, LLC (Traffic Jam Events) and its owner David J. Jeansonne, II. This litigation involves the FTC’s administrative opinion and order in a 2021 ruling (previously reported) that Traffic Jam Events and its owner violated both the FTC Act and TILA and banning them from the auto industry. In 2025, a federal court of appeals rejected challenges to the Commission’s 2021 administrative decision and order against Traffic Jam Events and its owner, upholding the agency’s ruling. In 2025, the FTC mailed refund checks totaling more than \$19.8 million to 29,653 consumers that the agency alleged were harmed by household water treatment funding company Aqua Finance.

No other agencies with TILA enforcement authority reported taking any public enforcement actions related to TILA during the reporting period.

EFTA: Public enforcement actions and reimbursements

The purpose of EFTA is to provide a basic framework establishing the rights, liabilities, and responsibilities of participants in electronic fund and remittance transfer systems. The primary

objective of EFTA is the provision of individual consumer rights.⁴³

The enforcement efforts made and reimbursements required by all the agencies assigned enforcement authority under EFTA are discussed in this section. As required by EFTA, the CFPB monitors what effects EFTA has on compliance costs for financial institutions, as well as the benefits of EFTA to consumers.

Consumers use electronic payments more than any other type of payment. Consumer reliance on electronic payments compared to that of non-electronic payments has increased over the last decade.

Overall adoption of electronic payment methods is largely universal, with 98 percent of consumers having a credit card, debit card, or prepaid card.⁴⁴ According to the 2025 Survey and Diary of Consumer Payment Choice, 67 percent of transactions were completed using a debit, credit or prepaid card. Other electronic payment methods—such as a bank account number payment or a bill payment through online banking—comprise an additional 13 percent of transactions. In contrast, just 16 percent of transactions were completed using cash or a check.⁴⁵ While about three-quarters (76 percent) of consumers still carried cash in 2025, this share is down from 84 percent who reported doing so in 2016.⁴⁶ A large and growing share of consumers prefer to use a debit card or credit card for in-person payments rather than cash: 78 percent of consumers noted credit cards or debit cards as their preferred in-person payment method in 2025, relative to 16 percent of consumers who preferred cash.⁴⁷ Consumers increasingly use credit cards and debit cards for small-value purchases (under \$25) rather than opting to pay in cash.⁴⁸

Although consumers tend to conduct fewer Automated Clearing House (ACH) transactions relative to card transactions, the consumer dollar volume transmitted via ACH is higher. ACH payment volumes totaled approximately 35.2 billion transactions and \$93 trillion in 2025—an increase of approximately 4.9 percent and 7.9 percent, respectively, from 2024.⁴⁹ The CFPB estimates consumer account debits represent more than half of all ACH transaction volume and

⁴³ 15 U.S.C. § 1693(b).

⁴⁴ Kevin Foster and Marcin Hitzenko, *2025 Survey and Diary of Consumer Payment Choice: Summary Results*, Federal Reserve Bank of Atlanta, 7 (May 2026), <https://www.atlantafed.org/-/media/Project/Atlanta/FRBA/Documents/banking/consumer-payments/survey-diary-consumer-payment-choice/2025/2025-SDCPC-results-report.pdf>.

⁴⁵ *Id.* at 12.

⁴⁶ Shaun O'Brien and Hailey Phelps, *2026 Findings from the Diary of Consumer Payment Choice*, Federal Reserve Financial Services, 13 (2026), <https://www.frbfinancialservices.org/binaries/content/assets/crsocms/news/research/2026-diary-consumer-payments-choice.pdf>.

⁴⁷ *Id.* at 9.

⁴⁸ *Id.* at 12.

⁴⁹ *Overall ACH Network Volume*, NACHA, <https://www.nacha.org/content/ach-network-volume-and-value-statistics> (accessed July 27, 2026).

more than a third of ACH dollar volume.

Digital wallet use continues to grow as a key payment mechanism, as consumers shift from directly using cards to using them via these wallets. In 2025, digital wallets accounted for 40 percent of online spending and 17 percent of in-store spending.⁵⁰

Electronic person-to-person payments (P2P) continue to represent a growing category of electronic fund transfer (EFT). Available data underscores this growth. For example, Zelle reported more than \$1.2 trillion in payment volume by consumers and small businesses using its network in 2025—an increase of 20% from the previous year.⁵¹ Likewise, PayPal reported over \$430 billion in P2P volume in 2025, which includes its Venmo and Xoom platforms.⁵² However, the market for P2P EFT remains challenging to precisely size for several reasons. First, a number of firms facilitate P2P EFTs over a variety of proprietary platforms. Second, reporting is not standardized across companies, with some entities including their branded credit card and debit card volume or transaction volume outside of the United States into figures. Finally, many P2P services utilize legacy EFT platforms to transmit payment messages and settle transactions such that P2P transaction volume is often conflated with that of the legacy payment systems upon which the P2P services rely.

The agencies charged with enforcement of EFTA under 15 U.S.C. § 1693 include the:

- CFPB,
- FDIC,
- Board,
- NCUA,
- OCC,
- FTC,

⁵⁰ 2026 Worldpay Global Payments Study, *see* Business Wire, *Gen Z Driving the Shift from Cards to Digital Wallets, New Research from Global Payments Suggests* (Mar. 31, 2026), <https://www.businesswire.com/news/home/20260331165747/en/Gen-Z-Driving-the-Shift-from-Cards-to-Digital-Wallets-New-Research-from-Global-Payments-Suggests>.

⁵¹ *Zelle Posts 20% Growth with \$1.2 Trillion Sent, Far Outpacing Consumer Spending and Cementing Its Role in the U.S. Economy* (Feb. 11, 2026), <https://www.zelle.com/press-releases/zelle-posts-20-growth-12-trillion-sent-far-outpacing-consumer-spending-and-cementing>.

⁵² *PayPal 4Q & FY '25 Performance*, 17 (Feb. 3, 2026), https://s205.q4cdn.com/875401827/files/doc_financials/2025/q4/PYPL-4Q-25-Earnings-Presentation.pdf. Note that an unspecified share of reported P2P volume is from P2P transactions in other countries.

- DOT, and
- Securities and Exchange Commission (SEC).

During the reporting period of January 1, 2024, through December 31, 2025, the following agencies reported public enforcement actions under EFTA, including:

TABLE 2: 2024 AND 2025 PUBLIC ENFORCEMENT ACTIONS RELATED TO EFTA

Agency	Summary
CFPB	In 2024, the CFPB: ▪ Issued an order against a bank for, among other things, failing to notify consumers of increases in the amounts of preauthorized electronic-fund transfers; and ▪ Filed four additional actions under EFTA and Regulation E, three of which were dismissed with prejudice and one of which was dismissed without prejudice. In 2025, the CFPB: ▪ Issued an order against a nonbank that operates a mobile payments application for, among other things, failing to conduct investigations promptly, or in some cases at all, upon Notices of Error from consumers that provided the required information; failing to provide provisional credits; failing to conduct reasonable investigations; failing to comply with limitations of liability; and failing to retain required records; and ▪ Issued an order, which was subsequently modified, against a nonbank remittance transfer provider for, among other things, failing to provide disclosures and notices, including change-in-term notices; failing to adhere to error resolution provisions and failure to correct errors; failing to comply with the retention of document requirements; and failing to develop and maintain policies and procedures that are designed to ensure compliance with error resolution requirements.
FTC	In 2024, the FTC filed a complaint against two groups of defendants, collectively known as Legion Media, alleging that they defrauded consumers nationwide by enrolling them, without their knowledge, into continuity plans where they are shipped and charged repeatedly for personal care products that they did not agree to purchase. The complaint alleged, inter alia, that defendants debited money from consumers' bank accounts without prior

	authorization. In 2024, the FTC mailed refund checks in connection with a negative option case that was previously settled. The FTC sent checks to consumers harmed by purported “free trial” offers for personal care products and dietary supplements who instead were allegedly charged full price and enrolled in continuity plans without their knowledge by Apex Capital Group and related entities. In 2025, the FTC obtained an order against telemedicine company NextMed and its principals. The complaint charged the respondents with violating the FTC Act, EFTA, and Regulation E (for failing to obtain consumers’ authorization for preauthorized electronic fund transfers and to provide consumers with a copy of the authorization), and other laws. In 2025, the FTC mailed refund checks in connection with the negative option settlement involving Legion Media, in which the FTC complaint alleged violations of the FTC Act, and EFTA and Regulation E.
FDIC	In 2024, the FDIC issued one public enforcement action to one financial institution citing EFTA and Regulation E.

No other agencies with EFTA enforcement authority reported taking any public enforcement actions related to EFTA during the reporting period.

CARD Act: Public enforcement actions and reimbursements

The CARD Act amended TILA to establish fair and transparent practices for the extension of credit under an open-end consumer credit plan. Section 502(e) of the CARD Act requires reporting on supervision and enforcement activities undertaken by the federal banking agencies (the Board, FDIC, and OCC) and the FTC with respect to compliance by credit card issuers with applicable federal consumer protection statutes and regulations, including the CARD Act and Section 5 of the FTC Act.

During the reporting period of January 1, 2024, through December 31, 2025, the following agencies reported public enforcement actions under the applicable federal consumer financial protection laws:

TABLE 3: 2024 AND 2025 PUBLIC ENFORCEMENT ACTIONS RELATED TO THE CARD ACT OR SECTION 5 OF THE FTC ACT

Agency	Summary
CFPB	In 2024, the CFPB filed one action under the Card Act that was dismissed with prejudice.
FDIC	In 2024, the FDIC issued four public enforcement actions against four credit card issuers related to violations of Section 5 of the FTC Act involving credit card products. In 2025, the FDIC issued three public enforcement actions against one credit card issuer related to violations of Section 5 of the FTC Act.
Board	In 2024, the Board had one Cease and Desist Order against Green Dot Bank related to the FTC Act. Green Dot violated consumer law in its marketing, selling, and servicing of prepaid debit card products, and its offering of tax return preparation payment services.

No other agencies reported public enforcement actions related to the CARD Act or other applicable federal consumer financial protection laws during the reporting period.

Assessment of compliance and common violations – TILA and EFTA

The agencies that are members of the Federal Financial Institutions Examination Council (FFIEC)⁵³ reported overall compliance by supervised entities with TILA, EFTA, and their respective implementing regulations.⁵⁴ The agencies did report, however, that more institutions were cited for violations of Regulation Z than Regulation E in both the 2024 and 2025 reporting periods. This section outlines the most frequently cited violations of Regulation Z and Regulation E across the FFIEC agencies for the reporting period, based on reporting provided by each agency.⁵⁵

Between January 1, 2024, and December 31, 2025, the most frequently cited violations of

⁵³ The “FFIEC agencies” include the OCC, FDIC, Federal Reserve, NCUA, and the CFPB.

⁵⁴ Other agencies either did not conduct compliance examinations for TILA, EFTA, and their respective implementing regulations, or reported general compliance for the laws under their jurisdiction.

⁵⁵ Because the FFIEC agencies use different methods to compile data, the information presented here supports only general conclusions.

Regulation Z across the FFIEC agencies were:

- 12 C.F.R. § 1026.4 – Failure to accurately calculate the finance charge.
- 12 C.F.R. § 1026.7(a) - Failure to provide consumers with certain information on periodic statements for home equity plans secured by a dwelling.
- 12 C.F.R. § 1026.7(b) - Failure to provide consumers with complete and accurate periodic statements for open-end plans other than home equity plans secured by a dwelling.
- 12 C.F.R. § 1026.11(a) – On open-end credit, improper treatment of credit balances in excess of \$1.
- 12 C.F.R. § 1026.13 – On open-end credit, failure to comply with the investigation and timeframe requirements for resolving billing errors.
- 12 C.F.R. § 1026.17(c)(1) – On closed-end credit, failure to provide disclosures that reflect the legal obligations between the parties.
- 12 C.F.R. § 1026.18(c) – On closed-end credit, failure to itemize - or accurately itemize - the amount financed on required disclosures.
- 12 C.F.R. § 1026.18(d) – On closed-end credit, failure to disclose—or accurately disclose—the finance charge, using that term, and a brief description such as “the dollar amount the credit will cost you.”
- 12 C.F.R. § 1026.18(l) – On closed-end credit, failure to disclose - or accurately disclose - any charge imposed for late payment.
- 12 C.F.R. § 1026.19(b);(d) - For variable-rate transactions secured by the consumer’s principal dwelling with a term greater than a year, in which the annual percentage rate may increase after consummation, failure to provide the disclosures outlined in § 1026.19(b) at the time an application form is provided or before the consumer pays a non-refundable fee, whichever is earlier, except as provided under § 1026.19(d).
- 12 C.F.R. § 1026.19(e) – On closed-end credit, failure to provide a consumer with a loan estimate disclosing the information required under § 1026.37, that adheres to the requirements of § 1026.19(e)(1)-(3).
- 12 C.F.R. § 1026.22 – On closed-end credit, failure to accurately determine or disclose the annual percentage rate.
- 12 C.F.R. § 1026.37 – Failure to provide consumers with content of disclosures for

certain mortgage transactions (Loan Estimate).

- 12 C.F.R. § 1026.38(o) – Failure to disclose on the Closing Disclosure under the heading “Loan Calculations,” the “Total of Payments,” the “Finance Charge,” the “Amount Financed,” the “Annual Percentage Rate,” using that term and the abbreviation “APR” and expressed as a percentage, and the “Total Interest Percentage,” using that term and the abbreviation “TIP” and expressed as a percentage.
- 12 C.F.R. § 1026.40(d)(5) – Failure to disclose – or accurately disclose – the payment terms for home equity plans.
- 12 C.F.R. § 1026.41 – Failure to provide complete, accurate, and timely periodic statements for residential mortgage loans.

For the reporting period of January 1, 2025, through December 31, 2025, the most frequently cited violations of EFTA/Regulation E across the FFIEC agencies were:

- 12 C.F.R. § 1005.6(a) – Holding consumers liable for unauthorized electronic funds transfers without providing disclosures required by 12 C.F.R. § 1005.7(b)(1), (b)(2), and (b)(3).
- 12 C.F.R. § 1005.7(a) – Failure to provide required disclosures within prescribed time frames.
- 12 C.F.R. § 1005.10(e)(1) – Conditioning an extension of credit to a consumer on the consumer’s repayment by preauthorized electronic funds transfer.
- 12 C.F.R. § 1005.10(e)(2) - Requiring a consumer to establish an account with a certain financial institution for the receipt of electronic funds transfer as a condition of employment or receipt of a government benefit.
- 12 C.F.R. § 1005.11(b) – Failure to follow certain processes upon receipt of a written error notice from a consumer.
- 12 C.F.R. § 1005.11(c) – Failure to comply with the investigation and timeframe requirements for resolving errors in electronic fund transfers.
- 12 C.F.R. § 1005.11(d) – Failure to follow the required procedures when an investigation determines no error, or a different error occurred.
- 12 C.F.R. § 1005.13(b) – Failure to retain evidence of compliance with EFTA/Regulation E for a period of not less than two years from the date disclosures are required to be made or action is required to be taken, or, if the financial institution has actual notice that it is

the subject of an investigation or an enforcement proceeding, until final disposition of the matter.

- 12 C.F.R. § 1005.17(b) – Failure to follow opt-in requirements prior to assessing a fee or charge on a consumer’s account for paying an ATM or one-time debit card transaction pursuant to the institution’s overdraft service.
- 12 C.F.R. § 1005.17(d) – Failure to comply with content and format requirements of required disclosures for overdraft services.
- 12 C.F.R. § 1005.19(b)(6)(i)(A) – Failure to include required provisions and fee information currently in effect in a prepaid account agreement submitted to the CFPB.
- 15 U.S.C. § 1693l – Entering into any writing or other agreement containing any provisions which constitute a waiver of any consumer right conferred or a cause of action created under EFTA.

Outreach related to TILA and EFTA

The FFIEC agencies have assisted supervised institutions in complying with the requirements of TILA, EFTA, and their respective implementing regulations through focused reviews, targeted resources and industry training events, and publications focused on consumer compliance issues. They also continue to train examiners on regulatory requirements and provide examination tools to identify and monitor risk. The agencies also provided guidance to consumers on these topics through various means, such as publications, workshops, blogs, and other outreach events.

In addition, the CFPB issued a number of reports and publications relating to consumer financial products and services governed by TILA and EFTA during the reporting period:

- The Bureau issued several reports and publications regarding the credit card market. In 2025, the CFPB issued its biennial review of the consumer credit card market, as required by the CARD Act. The report highlighted how consumers use credit cards, practices of credit card issuers, and how the credit card market is changing. The report also covered deferred interest, promotional interest, card transaction disputes, and innovations in the marketplace. Consistent with the report’s mandate, it considers consumers with below-prime credit scores and covers topics related to the cost and availability of credit.⁵⁶ The Bureau published in 2024 and 2025⁵⁷ its annual reports to Congress on college credit card

⁵⁶ See *The Consumer Credit Card Market: Report to Congress* (December 2025), available at https://files.consumerfinance.gov/f/documents/cfpb_consumer-credit-card-market-report_2025.pdf

⁵⁷ See *College Credit Card Agreements: Annual Report to Congress* (December 30, 2025), available at https://files.consumerfinance.gov/f/documents/cfpb_college-credit-card-agreements-report_2025-12.pdf

agreements, which lists information submitted to the Bureau concerning agreements between credit card issuers and institutions of higher education or certain organizations affiliated with such institutions in connection with the issuance of credit cards. In addition to this information, the 2024 report also included information on college-sponsored deposit accounts and prepaid cards.⁵⁸ The Bureau also released publications on the high cost of retail credit cards,⁵⁹ the spike in credit card cash advance fees after the legalization of sports gambling,⁶⁰ and a comparison between the interest rates offered by large banks and those offered by smaller banks and credit unions.⁶¹

- In 2025, the CFPB issued a report on the challenges that servicemembers face in the auto lending market, and the implications that these experiences can have for servicemembers' economic well-being and financial stability. The report includes an analysis of loan-level information from six lenders and describes findings that servicemembers experienced increased financial risk at many points in auto lending compared to non-servicemembers.⁶²
- In 2024, the Bureau published a data spotlight that examined the increase in mortgage interest rates between January 2021 and October 2023. The spotlight discussed the impact of higher interest rates on home affordability, the distribution of interest rates on existing mortgages, and the potential for refinancing as interest rates decrease.⁶³ Another data spotlight highlighted the increase in the number of borrowers who paid discount points as a result of increasing interest rates and alerted consumers that although discount points may provide an advantage to some borrowers, the financial tradeoffs involved in discount points are complex, which creates risk for some consumers.⁶⁴

⁵⁸ See *College Banking and Credit Card Agreements: Annual Report to Congress* (December 2024), available at https://files.consumerfinance.gov/f/documents/cfpb_college-banking-and-credit-card-agreements-report_2024-12.pdf

⁵⁹ See *The High Cost of Retail Credit* (December 18, 2024), available at <https://www.consumerfinance.gov/data-research/research-reports/credit-card-data-small-issuers-offer-lower-rates/> and <https://www.consumerfinance.gov/data-research/research-reports/issue-spotlight-the-high-cost-of-retail-credit-cards/>

⁶⁰ See *Data Spotlight: Credit card cash advance fees spike after legalization of sports gambling* (December 2024), available at <https://www.consumerfinance.gov/data-research/research-reports/data-spotlight-credit-card-cash-advance-fees-spike-after-legalization-of-sports-gambling/>.

⁶¹ See *Credit Card Data: Small issuers offer lower rates* (February 2024), available at <https://www.consumerfinance.gov/data-research/research-reports/credit-card-data-small-issuers-offer-lower-rates/>

⁶² See *Auto Lending to Servicemembers* (January 2025), available at https://files.consumerfinance.gov/f/documents/cfpb_servicemember-auto-finance-report_2025-01.pdf.

⁶³ See *Data Spotlight: The Impact of Changing Mortgage Interest Rates* (September 2024), available at <https://www.consumerfinance.gov/data-research/research-reports/data-spotlight-the-impact-of-changing-mortgage-interest-rates/>.

⁶⁴ See *Data Spotlight: Trends in discount points amid rising interest rates* (April 2024), available at <https://www.consumerfinance.gov/data-research/research-reports/data-spotlight-trends-in-discount-points-amid-rising-interest-rates/>.

During the reporting period, the FTC released several reports and publications and engaged in several consumer outreach initiatives on matters involving TILA and EFTA compliance.

- In 2024⁶⁵ and 2025,⁶⁶ the FTC released its annual reports to Congress on protecting older adults, highlighting key trends based on fraud reports by older adults and the FTC's multi-pronged efforts to combat the problem through law enforcement, rulemaking, and outreach and education. The reports highlighted the FTC enforcement actions against companies that violated TILA and EFTA, and that engaged in deceptive and misleading conduct against consumers.
- In 2024, the FTC's Military Task Force, which includes a cross-section of agency representatives, continued work on military consumer protection issues. The Task Force represents part of the agency's collaborative effort to provide resources for military consumers and is aimed at identifying their needs and formulating initiatives to empower servicemembers, veterans, and their families, including through law enforcement actions.
- In 2024 and 2025, the FTC staff participated in an interagency group that coordinates with the Department of War (DOW) on issues pertaining to the Military Lending Act (MLA) and DOW's military lending rule implementing the MLA, which includes issues related to the TILA such as automobile financing and leasing issues, and small dollar lending.⁶⁷ The group also coordinates on issues related to preauthorized electronic transfers under EFTA and Regulation E.
- Throughout the reporting period, the Commission released numerous articles on consumer financial products, including home equity loans and home equity lines of credit (HELOCs);⁶⁸ payday loans and cash advances;⁶⁹ and payment cards, including credit cards, charge cards, secured credit cards, debit cards, and prepaid cards.⁷⁰ The FTC also provided information to consider and sample letters that consumers can use if they

⁶⁵ See *Protecting Older Consumers 2023-2024: A report of the Federal Trade Commission* (October 18, 2024), available at https://www.ftc.gov/system/files/ftc_gov/pdf/federal-trade-commission-protecting-older-adults-report_102024.pdf.

⁶⁶ See *Protecting Older Consumers 2024-2025: A report of the Federal Trade Commission* (December 1, 2025), available at https://www.ftc.gov/system/files/ftc_gov/pdf/P144400-OlderAdultsReportDec2025.pdf.

⁶⁷ The MLA requires the DOW to coordinate with several federal agencies, including the FTC, in prescribing regulations and not less often than once every two years thereafter. See 10 U.S.C. § 987.

⁶⁸ See *Home Equity Loans and Home Equity Lines of Credit* (November 2024), available at <https://consumer.ftc.gov/articles/home-equity-loans-and-home-equity-lines-credit>

⁶⁹ See *Payday Loans and Cash Advances Explained* (August 2024), available at <https://consumer.gov/debt/payday-loans-and-cash-advances-explained#!what-it-is>

⁷⁰ See *Comparing Credit, Charge, Secured Credit, Debit, or Prepaid Cards*, FTC Bureau of Consumer Protection Alert, available at <https://consumer.ftc.gov/articles/comparing-credit-charge-secured-credit-debit-or-prepaid-cards>

dispute credit card or debit card charges.⁷¹ The Commission released information pertaining to issues with negative options and subscriptions, highlighting the importance of understanding the terms of a trial before enrolling.⁷²

⁷¹ See *Sample Letter for Disputing Credit and Debit Card Charges* (November 2024), available at <https://consumer.ftc.gov/articles/sample-letter-disputing-credit-and-debit-card-charges>

⁷² See *Getting In and Out of Free Trials, Auto Renewals, and Negative Option Subscriptions* (September 2024), available at <https://consumer.ftc.gov/articles/getting-and-out-free-trials-auto-renewals-and-negative-option-subscriptions>.