

Congress Must Protect Consumers from Predatory Lending

Since the American Revolution, states have limited interest rates to stop predatory lending. But predatory lenders are starting to launder their loans through banks to **evade state laws that make loans up to 179% APR illegal.** (Bank loans are generally exempt from state rate caps.) A rule by the Office of the Comptroller of the Currency (OCC), the regulator of the nation's largest banks, effective last December protects these predatory lending "rent-a-bank" schemes and overturn centuries of caselaw allowing courts to look beyond ruses to the truth.

At least 10 high-cost consumer lenders, many of which operate payday or auto title brands—American First Finance, Axcess Financial (Check 'n Go, Allied Cash Advance), Check Into Cash, CURO (Speedy Cash, Rapid Cash), Duvera Billing Services (EasyPay), Elevate (Rise, Elastic), Enova (CashNet USA, NetCredit, OnDeck), Wheels Financial (LoanMart, ChoiceCash), OppLoans (OppFl), Applied Data Finance (Personify)—are using five FDIC-supervised banks and one OCC-supervised bank to make high-cost rent-a-bank loans to consumers. Consumers from every state have submitted more than 6,000 complaints about these companies to the Consumer Financial Protection Bureau.¹ Consumers are asked to provide details about their complaint and can opt to disclose those narratives publicly. Stories from consumers in most states are listed below. Other complaints are evident from lawsuits. (One other predatory lender, World Business Lenders, uses OCC-supervised Axos bank to offer high-cost small business rent-a-bank loans that result in foreclosures of the owner's home.) Below is just a sampling of these complaints.

Congress must overturn the OCC "fake lender" rule to prevent state usury laws in at least 45 states from becoming a "dead letter."

* * * * * * * * * * * *

Alabama Borrower, Elevate's Rise: "This company has extremely high interest fees and should be illegal. I quickly found myself in a situation I couldn't afford so the account was charged off. I was called within a couple of months with a settlement offer of less than {\$600.00} which I accepted. The company offered to delete the charged-off account from my credit history if I accepted and paid the debt that day which I did. I am still showing the debit is unpaid on my history as well as that I still owe the full balance. This company not only takes part in predatory lending, but they also take part in predatory collecting of debts. Please delete this from my credit history ASAP." [#382674]

Arizona Borrower, Opportunity Financial, LLC: "I applied for a loan with XXXX who denied me then referred me to XXXX who took all info my then OppLoan popped up saying congratulations with the most outrageous option for a XXXX loan ever. The option was XXXX a month for 3 years at 160 % interest... I did not complete the app because that is extreme predatory lending!" [#3575692]

Arizona Borrower, EasyPay: "Had to get our transmission fixed. . .Applied for credit for {\$1500.00} ... The manager said if we pay off everything by XX/XX/XXXX everything should be fine. He let us know that the payments would be {\$200.00} a month. Come to find out it was at a 151.99 % interest rate for the next 24 months. We have now paid {\$1400.00} and only {\$91.00} of that has gone to the principle, leaving {\$1300.00} paid in interest. I feel that in our time of need, XXXX took advantage of us and we will pay more than double the amount of which we borrowed. We have paid on-time continuously and are left in debt because of it." [#2789482]

¹ Consumer Financial Protection Bureau, Complaint Database search, (March 19, 2021). https://www.consumerfinance.gov/data-research/consumer-complaints/.

California Borrower, CURO Intermediate Holdings: "In 2018 I got a loan from " SPEEDY CASH " in XXXX, CA fro {\$5000.00} which I was making monthly payments on it; then I lost my job and I couldn't pay the amount I was told, I went to their office to try and making a new payment arrangement but they denied me that help, they told me to wait and the more I waited the more interests it accumulated, this company charges ridiculous interests very very high; which is 131.571 % annual. . . I noticed they put me on collection with adding {\$1500.00} more to the interests; I called the collection company... and I try to do a arrangement and they also denied me help after that this collection tried to cash a check for {\$6300.00} from the account without my autorization; I truly ignore the very high annual interests, Speedy Cash Loans is a very bad company I will never recommend this to anybody; for {\$5000.00} you will end up paying the ridiculous amount of {\$23000.00} after you are done with all the payments, meaning that the Financial charge is {\$18000.00} plus the {\$5000.00}." [#3820950]

California Borrower, Elevate's Rise: "I am a single mother who is living . . . below the poverty level. I have had my share of credit problems and have owed more than I make for quite some time. I was misled by Rise Credit to believe that they were unlike other predatory loan companies. By the time I understood what I had [signed], I had paid them thousands of dollars in interest. I have recently become temporarily unemployed and called them to ask for help during my time of financial hardship. They refused any solution and my account is headed to collections now . . . [T]he total paid is far over the amount I initially borrowed from Rise . . . This is robbery and all of the necessities I have for myself and my children are suffering because of it . . . How is it that they can do this? I am asking for help for not only my family, but for all of the families targeted by these predatory loans meant to target those living in poverty and struggling to live paycheck to paycheck." [#1487339]

Colorado Borrower, CURO Intermediate Holdings: "I renewed a payday loan with a company in Colorado called Speedy Cash. The payday loan agreement clearly stated the terms of the loan were to be a total of 4 monthly payments. . .In XXXX they debited XXXX 3 times and XXXX 1 time for a total of {\$470.00}. The only transaction that should have happened was XXXX ONE TIME until XXXX. This seems illegal and predatory. They clearly violated the terms of the loan. Now I'm having to work with the bank and the company to clarify the errors." [#3448538]

Connecticut Borrower, Personify Financial: "This company is operating in predatory practices and its operation is more analogous to the practices of a loan shark! Unfortunately, as a recent XXXX student, I was put in a predicament that forced me to either apply for this particular loanor be homelessand I chose the former. Within this timeframe that I applied for the loan, I was working and anticipated to pay back the loan before the loan terms indicated. However, a global pandemic called Covid-19 happened to the world. Shortly after, I was laid off from work and was unable to get a job for months. As such, it made it extremely difficult for me to pay my bills, rent, and expensesincluding to Personify Financial. When I gain employment, I made a total payment of {\$3000.00} for a loan in the amount of {\$4700.00}, and currently, Personify has only applied {\$360.00} towards my principal and {\$2600.00} towards the interest of this loan. The current interest rate is 93.50 %, at this rate; by the time this load is paid off, Personify would profit close to {\$15000.00} or more on a {\$4700.00} loan. Of this {\$4700.00}, I was only issued {\$4500.00} because I was also charged another fee before the money was issued....Personify Financial is nothing short of a loan shark. This is a predatory loan. It is unfair and unethical. This company needs to be under investigation for its immoral practices. To add insult to injury, this company preys on the most vulnerable population, those who are in desperate need of survival. Living in a country where you must decide whether to buy groceries or pay your bills. . . I feel that this company is not engaging in fair business practices and they are taking advantage of consumers. . ." [#3810980]

Delaware Borrower, Enova International Inc. (Net Credit): "This company practices in predictory lending practices during the pandemic. They advertise on their website the following (https: //netcredit.com/blog/how-cares-act-impact-credit-score/): "During the CARES Act, if your finances are affected by COVID-19, you can make an agreement with your creditor to update or change your payment terms, which may include temporarily skipping or reducing payments. As long as you maintain the new terms, youll be able to keep your account up-to-date without any damage to your credit score". I had to miss a couple of payments during COVID-19, and I communicated with netcredit from XX/XX/2020 to XX/XX/2020 and instituted repayment plan. During the CARES Act, my finances are affected by COVID-19. I made agreements to change my payment terms. I have maintained the new terms, but Netcredit is still reporting me as late...and damaging my credit score. I called and wrote a letter, asked to speak to suupervisor and was unable to. This company is currently being sued in VA for predictory lending practice. Horrible company." [#3886726]

Georgia Borrower, Enova International Inc. (Net Credit): "...I made a payment of $\{\$2000.00\}$ and I was told by the agent that I still needed to pay $\{\$2800.00\}$ to payoff this loan. This company is a ripoff. I have already paid over $\{\$6000.00\}$ for a $\{\$3300.00\}$ loan. I would like for the account to be paid in full for the loan principal remaining which is $\{\$1100.00\}$. Im not paying anything other than that" [\$3793095]

Kentucky Borrower, America First Finance: "i purchased furniture from XXXX XXXX. The loan amount was for {\$3000.00}. I was never explained that American First Finance APR was 144.60 % As of XX/XX/XXXX, i have paid back {\$4400.00}. I have called and asked for the disclosure and they did not provide me with it. I have called and complained numerously to the company. American First Finance refuse to help me, instead they kept withdrawing money out of my Bank account." [#3555449]

Idaho Borrower, Enova International Inc.: "This is a predatory loan. The interest rates and cash advance fees they charge people that are struggling make it impossible to pay back. The rates are predatory and don't fall under the Fair Lending Act. The interest rate is 299 % with a cash advance fee that is 25 % of the advance amount. Due to the predatory acts or this company, I was unable to pay my loan and it went to collections." [#3694858]

Illinois Borrower, Personify Financial: "...the rates are staggering and they never check to see if I could afford these loans ... And, I have been paying on a total of (XXXX) Payday loans for well over 9 months in succession with much difficulty the huge charges were destroying our ability to live after deducting well over 90 % of my take home income for well over 3 months and I have not paid my mortgage since XX/XX/XXXX and XX/XX/XXXX for both the first and second mortgages and I am in jeopardy of foreclosure as of this date, XX/XX/XXXX several Companies did not tell me of their extremely high rates they were and some also withdrew from my bank account even though I asked them to STOP future via EFT Revocation Letters. A Couple withdrew funds directly from my account even after it was Bank closed causing me to incur heavy bank fees per day of even {\$50.00} or {\$60.00} at certain intervals. This was a very stressful time . . . causing us to be fragmented and close to homeless situation." [#2291555]

Indiana Borrower, Personify Financial: "I started this loan on XX/XX/2019. I financed XXXX I have made 15 payments.... My interest rate is 98.98 % I will never pay off my balance at this rate, we are talking about 65 payments of XXXX totaling XXXX. For the consumer looking for a small personal loan, this is outstanding and incredibly insane. How can this be legal? This is getting people in trouble financially." [#3326027] (appears to be a rent-a-bank loan)

Kansas Borrower, EasyPay: "I entered a loan with XXXX (Duvera)...when purchasing a puppy...The details were {\$2500.00} loan with \$XXXX monthly payments with no interest. However as I look at my account there is an interest rate of 151% and they have put my balance at {\$2400.00} while I have paid {\$1500.00} and they have charged me for {\$1400.00} in interest. This is not correct and I was informed multiple times there was no interest. I have called XXXX and they have said they can do nothing about the interest accumulated and were very difficult to even talk to. I told them that I was told there was no interest when agreeing and asked what can I do to finish paying off my loan with no interest like we agreed upon. I am unsure what to do now. I want to pay off the remaining {\$900.00} I owe on my loan but will not pay the {\$1500.00} plus in interest that was never talked about or agreed upon." [#2826629]

Louisiana Borrower, CURO Intermediate Holdings: "The debt collector threatened to call my job and find out where i was to arrest me on site." [#3758960]

Maryland Borrower, Opportunity Financial, LLC: "I have been paying this loan for more than a year and the principal has not changed. I borrowed \$2000.00 and have paid \$4600.00 into this loan to date..." [#3106431]

Michigan Borrower, Opportunity Financial, LLC: "I contacted this firm opp loans several times . . . regarding the high interest[] rates being charged on my loan. I informed them that [we are] military spouses and famil[ies] . . . that we are protected against high interest rates. They informed me that they needed proof to review my interest rate. They then informed me that spouse loans are not covered under the military lending act and was notified by their legal department. My current interest rate is 159 % on short term installment loan. Please assist" [#3354050] (appears to be a rent-a-bank loan)

Minnesota Borrower, Personify Financial: "... I am currently paying an unbelievable interest rate. My loan details are as follows: Account Type Installment Loan Original Annual Percentage Rate (APR) 98.90 % Original Term 72 Months...Current Interest Rate 93.50 % Current Payment Amount {\$410.00} Current Payment Frequency Monthly Amount Financed {\$5000.00} Outstanding Principal Balance {\$4800.00} Accrued Interest {\$510.00} Unpaid Fees {\$270.00} Total Outstanding* {\$5600.00} I have been paying for over a year on this loan and now owe more than what the original loan was for." [#3579172]

Mississippi Borrower, CURO Intermediate Holdings: "Speedy Cash stopped the payday loans and changed to the installment loans . . . If your payment is due on a certain day they could move it up by 4 days but it [doesn't] help if that 4th day is not a payday. I have paid so many overdraft and bank fees until I feel ashame[d] and stupid. I needed the money but once you get it [it's] hard to get rid of it. I [don't] understand [what's] hard about reasonable payment arrangements. Your 4 day extension is not realistic to customers." [#2718087]

Missouri Brorrower, CURO Intermediate Holdings: "Speedy Cash took money from my . . . debit card without my authorization. I receive my social security SSI payments in the amount of \$730.00 on this card . . . my card was debited by Speedy Cash for the amount of \$520.00. When I called them they stated that my account was past due . . . and that it had gone into collections. . . They also said that there was nothing they could do because the third party collector was involved . . . When I called [the third party], the representative told me that they were not involved in collecting on this account any longer because Speedy Cash had taken the loan back. I am confused by the back and forth. Now, I am in a horrible position. My account was basically drained which leaves me with no money for the entire month. No money for rent, utilities, doctor visit, or prescriptions. I . . . have no idea what I am going to do." [#2657445]

Montana Borrower, Opportunity Financial, LLC: "Payday loan struggling to pay off and they helped by refinancing and now I have more to pay off." [#3383392]

Nebraska Borrower, EasyPay: "... They are not letting me pay within the interest free period of 90 days. First they said my card was returned. I dont have a card on file. I told them to take directly out of my account they have my routing and account number. They said they would take the payment out of bank account I have it in writing and they still have not taken the payment. I believe this is a stall tactic so I miss the payoff date and am forced to pay interest. They also told me a bank transfer takes 10days to process? Hello its 2019. These people must be stopped and reported 58 % finance charges??? Please help!..." [#3426200]

Nevada Borrower, LoanMart: "I needed money to pay for my moving expenses. I took a title max car loan. I 've tried to keep up with the payments but fall short so my payments are late and include a hefty penalty payment in addition to interest My plan is to pay the entire bill with large lump sum payments. The problem is the amount that is added to the principal balance makes it difficult to pay the loan off. My car was reposed this morning. In order to get my car back, I must pay them \$900.00 which includes towing, paying for personal property left in the car and making a trip to the police department to obtain a [repossession] receipt. This is robbery." [#2157776]

New Jersey Borrower, EasyPay: "I purchased a living room set... I made a down payment of {\$460.00} ... Financing the remaining {\$1500.00}... The agreement was {\$180.00} per month for 3 months only to pay a {\$40.00} fee if loan ({\$1500.00}) is paid off in it 's entirety. I made 2 payments ({\$180.00} each) I realized I was unable to pay the remaining balance of {\$1100.00} in it 's entirety within the 90 days. I go back to my contract to review terms and conditions to realize I 'm going to Incur an exuberant interest rate of 130 % on the remaining balance. I did contact the lending company to verify this rate being accurate as the representative confirmed it was and that it was ok for them to charge me this ridiculous interest rate. [The store] where I purchased the set from actually filled out information online (sight unseen) on my behalf only asking me to confirm certain basic information such as name address bank account info [etc.]. I would have never guessed I was being set up for usury, because I would have never signed up for a 130 % interest agreement. This was never brought to my attention quite naturally because they wouldn't have gotten the sale. I communicated with the owner of [the store] and he completely denied any responsibility for the situation . . ." [#2774318]

New Mexico, CURO Intermediate Holdings: "I took a loan with Speedy Cash. . . it was my third loan, as I am lower income and needed cash. I couldn't pay it back in full after other financial hardships, and stopped them from taking the excessive payments from my bank account by closing my account. The two previous loans I had paid in excess of 300 % interest on {\$300.00} loan. This last loan I believe was {\$350.00} or {\$500.00}, but I no longer have access to their login to see my account. In XX/XX/XXXX, they sent me a summons from my county courthouse. I responded timely, but asked them to provide me proof of the loan and the balance due. They were asking for over (\$1800.00). Per the Fair Debt Credit Protection Act, they had thirty days to provide me proof of the loan debt and the balance owed. They did not. on XX/XX/XXXX, I get an email from XXXX (no last name was given) at XXXX, stating I was to appear in court via phone (due to Covid-19 I assume) and a copy of the summons was attached, showing I had a phone court date for XX/XX/XXXX. No time given, and still no requested documentation was given to me. . . I now have to take a day off work to deal with this, and i still have not received the documentation I asked for, as provide by law (FDCPA), and I am not about to give thousands of dollars to this predatory payday loan company. I am considering taking legal action in the form of a class-action lawsuit, which by an online search, they have had several against them. I feel that after paying off two prior loans with them at astronomical, predatory interest rates, and falling victim to hard times shortly after this loan was taken, i should not have to pay back anything more than the original loan amount plus the annual normal interest rate of 18 %. . . " [#3725391]

New York Borrower, CURO Intermediate Holdings: "... I took out a loan for {\$1500.00} (possibly went up to {\$1800.00}), and I somehow now owe collections (on my credit report) {\$2300.00} for Speedycash. They started taking out {\$500.00} payments every two weeks, and I'm sure I paid over {\$4000.00} in payments to them over the course of months, maybe even more. How can I owe {\$4000.00} + {\$2300.00} for a {\$1800.00} loan?! I guess I didn't understand the paperwork but this ruined months of my life and forced me to take out another payday/installment loan with someone else to pay my rent. And of course that snowballed into a disaster. One point it got so bad I had to put a stop payment on an autopayment from them to pay my rent and they somehow got my debit card number (I never gave it to them) and made a payment to them on that. . . I still owe them money somehow. So depressing. Now I can't get apartment because my credit score is too low and this is the only bad thing on there except for {\$270.00} for my old cable box I think? Please help me figure out how to settle with them without paying them even more money. I feel so taken advantage of." [#3122930]

North Carolina Borrower, Personify Financial: "I was approved for a loan for {\$3500.00} . . . My payments are {\$140.00} biweekly. To date I have paid over {\$1800.00} on time. However, my current balance is . . . over the amount I borrowed. I am being told that my interest rate 98 % and if I pay according to the terms of the loan, I will pay out over {\$10000.00}. I want to pay what I owe plus a fair interest rate for someone with my credit profile but I am not able to comply with the current terms of the loan. I need assistance in making sure that XXXX is fair in their loan terms and updating the current terms which are clearly predatory." [#3224776] (appears to be a rent-a-bank loan)

North Dakota Borrower, Elevate's Rise: "On XX/XX/17 I needed to pay for a major repair on my vehicle and had to refinance an existing loan I had with Rise credit to an amount of \$2500.00. Since that date I have been making regular payments twice a month of \$230.00 and it has all been interest. I have made 21 payments, so over \$4000.00 in interest and my principal balance has not gone down at all. I am at a loss of what to do, because I was in a tight spot but had I known id be living this nightmare I never would have taken out this loan." [#2942998]

Ohio Borrower, Personify Financial: "I am a mother of 4. During a hard time, I took out an {\$8400.00} loan from Personify Financial on XX/XX/XXXX. The original interest rate is 78.69 %. 36 month term. I have paid to date {\$8500.00}. Only {\$1500.00} of those payments have gone to the principal balance. The other {\$7000.00} have gone to interest. I am on an automatic payment plan bi-weekly. {\$260.00} comes directly out of my bank account every 2 weeks. I have never been late on a payment to this company.... My interest rate is currently 71 %. This is a predatory loan. This is unethical. This company is charging exceptionally high interest rates. I have paid OVER the amount that I asked for. At this point, I am throwing money out the window. I can not afford this any longer. . . I will have paid them OVER {\$20000.00} for a {\$8400.00} loan. This is absolutely 100 % predatory." [#3519412]

Oklahoma Borrower, CURO Intermediate Holdings: "I received a letter from speedy cash debt collection dept threatening to sue me over old debt and also said that if I didn't respond within seven days my bank accounts would be seized thru major credit bureaus and that I was under investigation. They are asking for way more money than the original supposed debt." [#3907374]

Oregon Borrower, CURO Intermediate Holdings: "I got a payday loan...for {\$300.00} then again a day later. . . for {\$300.00} and then another one...for about {\$250.00}. . . Well there was no way I could pay those back and made a poor discion and the fact that it's legal is beyonf me. They probably ran my debit card 25 different times and some occasions they got money and the rest been insufficient. I have gotten collections letters numerous times...they some how got my other checking account information and it said it was debit card that was charged. They ran it 3 different times for {\$350.00}, {\$350.00} and {\$330.00}, where they got the amounts in do not know and how they got my card information I do not know but when I logged in my account they had multiple cards on file when I've only gave them one. They took over 1,000 of my unemployment money that I have been waiting almost 2 months for. I was gon na use it to try and catch up my already behind rent. I never authorized them to use that card and they shouldn't have to right to just run it 8 months later. And give no warning or receipt or even answer me.... I'm just sick and tired of businesses making me feel so helpless because they always win. Banks can take and hold your money whenever they want and never help you and it's just okay" [#3659266]

Pennsylvania Borrower, EasyPay: "The amount of money going toward the principal was really low and quite unexpected. I paid {\$1200.00} over 3-4 months and only {\$400.00} went toward the interest. Now it is after the first 100 days and the interest rate went up to 114 %. I will be paying this loan forever and keep getting deeper in. They take {\$140.00} every other Friday on a XXXX loan! The final payback amount is {\$3800.00} at this rate. No one told me when I went to the mechanic shop that I should just go sell my car. Even after the repair my car ended up having another \$ XXXX repair a few months later and with more knowledge, I went right to a dealership and sold it as it. No repair. No additional loan. So now I have a new car and new car note of {\$400.00} but have to pay {\$310.00} a month on this ({\$700.00} a month if I want to avoid the predatory interest)." [#3573868]

South Carolina Borrower, Enova International Inc. (Net Credit): "On XX/XX/2016 I was approved for a personal loan with NetCredit. I was unaware of the future circumstances and took out a very high interest loan, 99 % interest on a \$2000.00 [loan]. I have become a XXXX veteran and unemployed at the moment due to my condition. The total amount that I will be paying back on a \$2000.00 loan is \$7800.00. I have been paying on this loan since that date." [#3229883]

South Carolina Borrower, Enova International Inc. (Net Credit): "I took a loan from NetCredit in the amount of \$1200.00. To date I have made 11 payments at the payment amount of \$100.00 each for a total paid of \$2000.00 plus a check payment of \$100.00 which has not been cashed or applied to my account. NetCredit states I still have fourteen more payments of \$100.00 each to make. For a \$1200.00 loan, I will end up paying \$3600.00, more than THREE TIMES the loan amount!!" [#3324359]

Tennessee Borrower, Opportunity Financial, LLC: "I am being contacted everyday, with the exception of Sunday, for a month. The[y] want the loan paid but, I am unemployed and a [] veteran. I have tried to explain this to the company. However, they continue to contact me. It's the same thing everyday." [#2812101] (appears to be a rent-a-bank loan)

Texas Borrower, Elevate's Rise: "Due to COVID 19 I am not receiving a paycheck and my account is currently overdrawn. I have explained this to them however they will not offer any assistance and have reported me to the credit bureaus. They continue to try withdrawing different payment amounts. The last one that was returned to them from my bank was {\$56.00}. I would like for them to help me since this is a hardship situation and also remove the report to the credit bureaus." [#3739037]

Utah Borrower, Elevate's Rise: "I went to check my balance today and the history and it turns out all the payments have gone to interest, nothing is being applied to principle, . . . with everything going on with covid my checks are a lot less and I have asked for help prior and was told they still could not do anything. I asked if we could lower the payment because they offered that prior and now I am told that they will not...i've paid over {\$4500.00} i was told i have another year from today to finish paying off the loan...{\$10000.00} in interest is a lot and for the company to not work with you when you have been making payments." [#3902816]

Virginia Borrower, Enova International Inc. (Net Credit): "I am disputing this loan based on that it is impossible to pay it off at 98.8 % . . . I will pay over \$7000.00 for a \$3900.00 loan at 98.8 % . . . I have called and spoke with them about 10 times within the last 3 1/2 weeks. NETCREDIT WILL NOT WORK WITH ME OR DISCUSS ANY OPTIONS WITH ME. All I am asking for is to take the interest away from this loan and allow me to make monthly payments that I am able to handle. I understand my responsibility of the balance of the loan but they do not work with their consumers, instead make a profit with predatory lending practices." [#2183667]

Washington Borrower, Personify Financial: "... I obtained a loan through Personify Financial in the amount of {\$1500.00} ... What caused this issue, was that I ran into financial trouble soon after the loan was given. I contacted the company to ask about a delay in payment, and they denied. While doing some research, I found out that this company is not licensed in my state of WA, and it is required to be in order to offer loans. Further research showed that Personify Financial says that it does business with a XXXX XXXX XXXX in Utah. My loan would be given and serviced through them as I am in WA. When I phone the XXXX XXXX XXXX in Utah, I was informed that they had no account with my name, and do not have any information of me. Looking back on my paperwork, that name was mentioned in my loan documents, however Personify Financial deposited the money into my bank account, Personify Financial sent the invoices and all payments were made to them-never to XXXX XXXX XXXX. Additionally, my interest rate with Personify Financial for this loan was at 175.35 % which is a huge amount higher than that of WA allowed legal rate of 12 %. I understand now that they are using XXXX XXXX in Utah to simply be a front bank that allows them to make loans to people in states with licensing requirements and with percentage limits. This is what I believe to be illegal predatory lending...I asked that they simply lessen my APR to the legal amount in WA, especially since they are not licensed in this state to lend. They refused to budge and subsequently began charging me late fees and higher interest as I was in dispute with them....The total amount was {\$2600.00}, from an original loan amount of {\$1500.00} only 5 months before.... I contest that since Personify Financial is not legally allowed to lend in my state, and they are conducting some sort of back end scheme with a national bank in order to charge predatory lending rates at almost 200 % this should not be on my credit report.... I am sure other consumers-and good, upstanding consumers, are being bullied with these tactics..." [#3696514]

Wisconsin Borrower, Enova International Inc.: "They charged 299 % interest . . . I had no idea this is Robbing me ... I have payed the loan off however because of the interest rates I have barley paid the principle and I am still getting ridiculous interest charges of 299 %" [#3689776]

West Virginia Borrower, CURO Intermediate Holdings: "For one thing they didn't tell me when I took the loan out that there was 300 % interest on this loan. Didn't tell me as you go everyday that the loan grows interest everyday. Also I'm on public assistance. And I only get ssi every month. I can't afford payments of {\$300.00} to {\$400.00} a month. I tried to explain this but no one wanted to help me when I called. Now it's put agaisist my credit. If I could make a small payment a month I have no problem paying for the money I got but the interest is way too much" [#3359939]