



## MEMORANDUM

**DATE:** February 19, 2025

**TO:** Interested Parties

**FROM:** Consumer Federation of America  
Student Borrower Protection Center

**RE:** **Outstanding CFPB Enforcement Actions**

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Acting Consumer Financial Protection Bureau (CFPB) Director Russell Vought has frozen all of the Bureau's existing [enforcement actions](#). Leadership has completely ground to a halt all enforcement activities, including in matters that are in active litigation. This means that no work is being done on time-sensitive and critical litigation matters like discovery, expert preparation (leadership has [cancelled all contracts with expert witnesses](#)), and work on pending motions and briefs.

This memorandum aims to immortalize the full sweep of 38 pending CFPB enforcement actions as of publication, including two cases against predatory lenders that cheated military families (**in red text**). This memo also includes a list of 3 pending actions to enforce compliance with mandatory civil investigative demands from the Bureau to obtain more information about whether these companies have violated the law. Those actions include the following, in reverse chronological order:

- [Capital One Bank, N.A.](#): (filed Jan. 14, 2025) The Bureau sued Capital One for cheating consumers out of more than \$2 Billion in interest payments on savings accounts. The bank unlawfully misled consumers about its 360 Savings accounts and obscured its higher-interest savings product from them.
- [Experian Information Solutions, Inc.](#): (filed Jan. 7, 2025): The Bureau sued Experian for sham investigations of credit report errors. Experian does not properly investigate disputes and fails to remove or reinserts errors on reports, threatening consumers' access to credit, employment, and housing.

- [Vanderbilt Mortgage & Finance, Inc.](#): (filed Jan. 6, 2025): The Bureau sued Vanderbilt for setting families up to fail in manufactured home loans. The Berkshire Hathaway-owned company pushes people into unaffordable loans to purchase Clayton Homes.
- [Walmart Inc., and Branch Messenger, Inc.](#): (filed Dec. 23, 2024): The Bureau sued Walmart and Branch Messenger for illegally opening deposit accounts for more than one million delivery drivers. Walmart and Branch harvested more than \$10 million in junk fees through Walmart’s Spark Driver program.
- [Rocket Homes Real Estate LLC, dba Rocket Homes; JMG Holding Partners LLC, dba The Jason Mitchell Group; 45 real estate brokerage affiliates; and Jason Mitchell](#): (filed Dec. 23, 2024) The Bureau sued to stop an illegal kickback scheme to steer borrowers to Rocket Mortgage. Rocket Homes provided kickbacks to real estate brokers and agents to steer prospective borrowers to Rocket Mortgage.
- [Early Warning Services, LLC; Bank of America, N.A.; JPMorgan Chase Bank, N.A.; Wells Fargo Bank, N.A.](#): (filed Dec. 20, 2024) The Bureau sued JPMorgan Chase, Bank of America, and Wells Fargo for allowing fraud to fester on Zelle. Americans have lost hundreds of millions of dollars to fraud tied to payment network’s shoddy safeguards.
- [Comerica Bank](#): (filed Dec. 6, 2024) The CFPB sued Comerica Bank for systematically failing disabled and older Americans. Comerica hung up on recipients of Social Security and harvested junk fees from them.
- [Reliant Holdings, Inc. d/b/a Horizon Card Services; and Robert Kane](#): (filed Sept. 13, 2024) The CFPB sued Horizon Card Services and CEO Robert Kane for illegally baiting, gouging, and trapping families in high-fee credit cards. Consumers were charged up to \$300 a year in fees and card could only be used to buy overpriced items from Horizon’s online store.
- [Acima Holdings, LLC; Acima Digital, LLC; and Aaron Allred](#): (filed July 26, 2024): The Bureau sued Rent-a-Center affiliate Acima and Acima’s founder Aaron Allred for illegal lending practices. Acima deployed deceptive digital dark patterns to obscure key terms.
- [Pennsylvania Higher Education Assistance Agency \(PHEAA\) d/b/a American Education Services or AES](#): (filed May 31, 2024) The Bureau sued the student loan servicer PHEAA for pursuing borrowers for loans discharged in bankruptcy. The lawsuit alleged that PHEAA illegally collected money that borrowers do not owe, and that PHEAA reports false information to credit reporting companies.

- [SoLo Funds, Inc.](#): (filed May 17, 2024) The Bureau sued SoLo Funds for deceiving borrowers and illegally extracting fees. The company advertised zero-cost loans but deployed digital dark patterns resulting in almost every borrower paying at least one fee.
- [Pennsylvania Higher Education Assistance Agency, and National Collegiate Student Loan Trusts](#): (filed May 6, 2024) The Bureau took action to require the National Collegiate Student Loan Trusts and the Pennsylvania Higher Education Assistance Agency to pay more than \$5 million for student loan servicing failures. The defendants ignored student loan borrowers seeking payment relief, including during the COVID-19 national emergency
- [StratFS, LLC f/k/a Strategic Financial Solutions, LLC, et al.](#): (filed Jan. 10, 2024) The CFPB and seven state attorneys general sued the debt-relief enterprise Strategic Financial Solutions for illegally swindling more than \$100 million from financially struggling families. The defendants run an illegal enterprise that collects fees but delivers little relief.
- [Colony Ridge Development, LLC; Colony Ridge BV, LLC; Colony Ridge Land, LLC; and Loan Originator Services, LLC](#): (filed Dec. 20, 2023) The CFPB and the Justice Department sued the developer and lender Colony Ridge for bait-and-switch land sales and predatory financing. The lawsuit alleges the company targets Hispanic borrowers with false statements about homesites.
- [Heights Finance Holding Co. f/k/a Southern Management Corporation, et al.](#): (filed Aug. 22, 2023) The CFPB sued an installment lending conglomerate for illegally churning loans to harvest hundreds of millions in loan costs and fees. A CURO Group Holdings Company, Heights Finance, formerly known as Southern Management Corporation, induced struggling customers into a fee-harvesting and loan-churning scheme.
- [Snap Finance LLC, Snap RTO LLC, Snap Second Look LLC, Snap U.S. Holdings LLC, Snap Finance Holdings LLC](#): (filed July 19, 2023) The CFPB sued Snap Finance for illegally luring Americans into expensive financing and bullying borrowers using false threats. The company hid terms and conditions and deployed illegal debt collection tactics/
- [Credit Acceptance Corporation](#): (filed Jan. 4, 2023) The CFPB and the New York Attorney General sued Credit Acceptance for hiding auto loan costs, setting borrowers up to fail. The major subprime auto lender targets Americans with loans that it predicts they cannot afford to repay.
- [ACTIVE Network, LLC](#): (filed Oct. 18, 2022) The CFPB sues a payment platform used by YMCA camps and charity race organizers for illegally cramming consumers with junk

membership fees. ACTIVE Network generated more than \$300 million in membership fees using digital dark patterns and online trickery.

- [MoneyLion Technologies Inc., ML Plus, LLC, and other subsidiaries](#): (filed Sept. 29, 2022) The CFPB Sued MoneyLion for overcharging servicemembers and trapping consumers in costly memberships. The online lender allegedly required customers to pay hefty fees to access loans and often refused to cancel memberships.
- [Populus Financial Group, Inc., d/b/a ACE Cash Express, Inc.](#) (filed July 12, 2022): The CFPB sued ACE Cash Express for concealing no-cost repayment plans and improperly withdrawing consumers' funds. The repeat offender kept borrowers in debt and in the dark, generating at least \$240 million in reborrowing fees.
- [MoneyGram International, Inc. and MoneyGram Payment Systems, Inc.](#): (filed Apr. 21, 2022) The CFPB and New York's Attorney General sued the repeat offender moneygram for leaving families high and dry. The company ignored government warnings to stop and stranded customers waiting for their money.
- [TransUnion; Trans Union, LLC; TransUnion Interactive, Inc.](#); and John T. Danaher: (filed Apr. 12, 2022) The CFPB charged TransUnion and senior executive John Danaher with violating a law enforcement order. TransUnion deployed digital dark patterns to dupe Americans into subscription plans.
- [Craig Manseth, Jacob Adamo, Darren Turco, United Debt Holding LLC, JTM Capital Management, LLC, and United Holdings Group, LLC](#): (filed Jan. 10, 2022): The CFPB sued United Holding Group, its affiliates, and its owners for illegal debt collection practices. The debt collection company and its owners knowingly used third-party collectors that engaged in unlawful and deceptive tactics.
- [FirstCash, Inc., Cash America West, Inc., and First Cash Subsidiaries](#): (filed Nov. 12, 2021) The CFPB sued various pawn lenders for cheating military families. FirstCash, Inc. and Cash America West, Inc. allegedly made pawnshop loans to military families in violation of the Military Lending Act and a 2013 CFPB Order.
- [Student Loan Pro, Judith Noh, Syed Faisal Gilani, and FNZA Marketing, LLC](#): (filed Mar. 16, 2021) The CFPB took action against the operators of an unlawful student loan debt-relief scheme. The company unlawfully charged upfront fees to borrowers for accessing free debt relief programs.
- [Nexus Services, Inc., Libre by Nexus, Inc., Micheal Donovan, Richard Moore, and Evan Ajin](#): (filed Feb. 22, 2021) The CFPB joined the attorneys general of Virginia, Massachusetts, and New York in a lawsuit against Libre for a predatory immigrant-

services scam. The Bureau and the states accused the company of luring non-English-speaking immigrants into abusive, English-only contracts.

- [1st Alliance Lending, LLC, John Christopher DiIorio, Kevin Robert St. Lawrence, and Socrates Aramburu](#): (filed Jan. 15, 2021) The CFPB sued 1st Alliance Lending, LLC and its principals for allegedly unlawful mortgage lending practices. The Bureau alleged that the defendants violated the Truth in Lending Act, the Fair Credit Reporting Act, the Equal Credit Opportunity Act, the Mortgage Acts and Practices—Advertising Rule, and the Consumer Financial Protection Act of 2010.
- [FDATR, Inc.; Dean Tucci; and Kenneth Wayne Halverson](#): (filed Nov. 20, 2020) The CFPB sued the debt settlement company FDATR, Inc., and owners Dean Tucci and Kenneth Wayne Halverson. The Bureau alleged that the defendants violated the Telemarketing Sales Rule by engaging in deceptive and abusive telemarketing acts or practices and the Consumer Financial Protection Act of 2010 through deceptive acts or practices.
- [Commonwealth Equity Group, LLC \(d/b/a Key Credit Repair\); Nikitas Tsoukales \(a/k/a Nikitas Tsoukalis\)](#): (filed May 22, 2020) The CFPB and Massachusetts filed suit against credit-repair telemarketers. The Bureau alleged that in their telemarketing of credit-repair services, the defendants violated the Consumer Financial Protection Act’s prohibition against deceptive acts or practices and the Telemarketing Sales Rule’s prohibitions on deceptive and abusive telemarketing acts or practices.
- [Consumer Advocacy Center Inc., d/b/a Premier Student Loan Center; True Count Staffing Inc., d/b/a SL Account Management; Prime Consulting LLC, d/b/a Financial Preparation Services; Albert Kim; Kaine Wen; and Tuong Nguyen](#): (filed Oct. 21, 2019) The CFPB took action against a student loan debt relief operation. The Bureau alleged that since at least 2015, the debt-relief companies operated as a common enterprise and deceived thousands of federal-student-loan borrowers and charged over \$71 million in unlawful advance fees in connection with the marketing and sale of student-loan debt-relief services to consumers.
- [Future Income Payments, LLC, Scott Kohn, and related entities](#): (filed Sept. 13, 2018) The Bureau alleged that defendants represented to consumers that their pension-advance products were not loans, were not subject to interest rates, and were comparable in cost to, or cheaper than, credit-card debt when, in actuality, the pension-advance products were loans, and were subject to interest rates that were substantially higher than credit-card interest rates. The Bureau also alleged that the defendants failed to disclose a measure of the cost of credit, expressed as a yearly rate, for its loans.
- [National Collegiate Student Loan Trusts](#): (filed Sept. 18, 2017) The CFPB took action against the National Collegiate Student Loan Trusts and Transworld Systems for illegal

student loan debt collection lawsuits. All 800,000 loans will be independently audited, companies will pay at least \$21.6 million and stop suing for invalid or unverified debts.

- [Nationwide Biweekly Administration, Inc., Loan Payment Administration LLC, and Daniel S. Lipsky](#): (filed May 11, 2015) The CFPB files a suit against Nationwide Biweekly for luring consumers with false promises of mortgage savings. Consumers paid \$49 million in fees for deceptive mortgage payment program.
- [CashCall, Inc.](#); WS Funding, LLC; Delbert Services Corporation; and J. Paul Reddam: (filed Dec. 16, 2013) The CFPB sued CashCall for illegal online loan servicing. The CFPB alleged that the defendants engaged in unfair, deceptive, and abusive practices, including illegally debiting consumer checking accounts for loans that were void.

### **Civil Investigative Demand Enforcement Actions**

- [Check City Partnership, LLC](#) (petition filed June 12, 2023). Check City provides short-term, small-dollar and installment loans to consumers, and the CFPB filed this petition to enforce compliance with CID to produce documents and information related to whether it has improperly induced consumers to borrow these loan products, misrepresented their costs, or mischaracterized their products as short-term obligations.
- [Financial Asset Management, Inc.](#) (petition filed June 12, 2023). FAMI provides short-term, small-dollar and installment loans to consumers, and the CFPB filed this petition to enforce compliance with CID to produce documents and information related to whether it has improperly induced consumers to borrow these loan products, misrepresented their costs, or mischaracterized their products as short-term obligations.
- [National Credit Systems, Inc.](#) (petition filed on February 22, 2023). NCS is an Atlanta, Georgia debt collector that collects on consumer debt and furnishes information to consumer reporting agencies, and the CFPB filed this petition to enforce compliance with CID to produce documents and information related to its debt collection conduct.
- [Purpose Financial, Inc.](#) (petition filed on Jun 12, 2023). Purpose Financial is a payday lender that often does business under the name of Advance America and has referred to itself as the “largest nonbank provider of cash advance services in the United States.” The CFPB filed this petition to enforce compliance with CID to produce documents and information related to whether it improperly induced borrowers to take out, renew, or refinance loans, misrepresented the cost or nature of its loans, and/or whether Purpose improperly incentivizes employees to engage in these practices.