



## MEMORANDUM

**DATE:** July 7, 2025

**TO:** Interested Parties

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

**RE:** **Dismissed/Terminated CFPB Enforcement Actions**

---

Acting Consumer Financial Protection Bureau (CFPB) Director Russell Vought has repeatedly attempted to gut the only federal consumer financial law enforcement agency, including by dismantling its enforcement program. The Trump-Vought CFPB has permanently dismissed 22 of the Bureau's public enforcement actions that were pending at the time Trump took office, pardoning egregious repeat offender banks and corporations and sending the message that lawbreaking and corporate misconduct will be tolerated.

Even more alarming are the Trump-Vought CFPB's recent efforts to abolish or modify orders in at least **ten** settled actions where the lawbreaking companies agreed to compensate victims and pay fines for their misconduct. In some of those actions, the CFPB is seeking to reward the lawbreakers by returning or reducing the companies' civil money penalties, rather than make the victims whole. Critically, these penalties flow into a fund for scammed and defrauded victims of illegal conduct nationwide. Trump and Vought are abandoning the consumers they are required to protect.

This memorandum aims to memorialize the full sweep of public CFPB enforcement actions as of the date of publication, including those that have been dismissed or terminated, as well as those against [repeat offenders](#) (captured in **red text**). Those actions include the following, in reverse chronological order:

### Public Enforcement Actions Permanently Dismissed

1. [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.

2. [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 manufactured homes built by Clayton Homes, another Berkshire-Hathaway company.
3. [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.
4. [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 violated the law by providing incentives to real estate brokers and agents to steer prospective borrowers to Rocket Mortgage.
5. [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.
6. [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.
7. [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 the credit card could only be used to buy overpriced items from Horizon's online store.
8. [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.
9. [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.

10. [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 fees.
11. [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. The CFPB has withdrawn from this case, which continues to be prosecuted by the New York Attorney General.
12. [ACTIVE Network, LLC](#): (filed Oct. 18, 2022) The CFPB sued a payment platform used by YMCA camps and charity race organizers for charging illegally junk membership fees. ACTIVE Network generated more than \$300 million in membership fees using digital dark patterns and online trickery.
13. [Heights Finance Holding Co. f/k/a Southern Management Corporation, et al.](#): (filed Aug. 22, 2023) The CFPB sued an installment lender for illegally churning loans, harvesting hundreds of millions in loan costs and fees.
14. [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 lease-to-own finance company Snap Finance for deceiving consumers, obscuring the terms of its financing agreements, and making false threats. The company hid terms and conditions and deployed illegal debt collection tactics.
15. [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 funds from consumers' bank accounts. The repeat offender kept borrowers in debt and in the dark, generating at least \$240 million in reborrowing fees.
16. [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. The CFPB has withdrawn from this case, which continues to be prosecuted by the New York Attorney General.
17. [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.

18. [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 owners for allegedly unlawful mortgage lending practices.
19. [National Collegiate Student Loan Trusts](#): (filed Sept. 18, 2017) In 2017, the CFPB filed a lawsuit alleging that the National Collegiate Student Loan Trusts' subservicers, acting on behalf of the Trusts, sued consumers for debts the Trusts could not prove were owed, filed false and misleading affidavits, and attempted to collect after the statute of limitations expired.
20. [Check City Partnership, LLC](#) (**CID Enforcement Action**) (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.
21. [Financial Asset Management, Inc.](#) (**CID Enforcement Action**) (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.
22. [Purpose Financial, Inc.](#) (**CID Enforcement Action**) (petition filed on June 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.

### **Consent Orders the CFPB Has Terminated Early, Sought to Vacate, or Declined to Enforce**

1. [Wise US Inc.](#) (consent order filed January 30, 2025): The Bureau amended a consent order with Wise, a global electronic money services corporation imposing redress obligations and penalties for violations related to its (1) its use of deceptive marketing disclosures relating to ATM fees leading to ATM fee overcharges and (2) its failure to comply with Electronic Fund Transfer Act (EFTA). The Bureau reduced Wise's civil money penalty from over \$2 million to \$44,955.

2. [Draper & Kramer Mortgage Corporation](#) (complaint and consent order filed January 17, 2025): In 2025, the Bureau filed a complaint and consent order against Draper & Kramer Mortgage Corporation alleging violations of the Equal Credit Opportunity Act (ECOA), ECOA's implementing regulation, and the Consumer Financial Protection Act (CFPA). The court entered a consent order that required Draper & Kramer to pay a \$1.5 million civil money penalty and enjoined violations of ECOA and the CFPA. The consent order also imposed on Draper & Kramer a 5-year ban on residential mortgage lending. On May 15, 2025, the Bureau issued a no-action letter stating that it would cease monitoring compliance with the order, will not engage in any supervisory activity to assess compliance with the consent order, and will take no steps to enforce the consent order.
3. [Fay Servicing, LLC](#) (consent order filed August 21, 2024): In 2024, the Bureau issued an order against Fay Servicing, LLC. On June 7, 2017, the Bureau previously issued an order against Fay Servicing. In that action, the Bureau found that Fay Servicing violated the Bureau's 2017 order, Regulation X, (which implements the Real Estate Settlement Procedures Act), the Homeowners Protection Act, Regulation Z (which implements the Truth in Lending Act), and the CFPA. The order required Fay Servicing to pay \$3 million in consumer redress, a \$2 million civil money penalty, and to invest \$2 million to update its servicing technology and compliance management systems. It also imposed a number of injunctive provisions. On July 1, 2025, the Bureau terminated the order and waived any alleged noncompliance.
4. [Navy Federal Credit Union](#) (consent order filed November 7, 2024): In 2024, the Bureau took action against Navy Federal Credit Union for charging illegal overdraft fees. From 2017 to 2022, Navy Federal charged customers surprise overdraft fees on certain ATM withdrawals and debit card purchases, even when their accounts showed sufficient funds at the time of the transactions. The CFPB ordered Navy Federal to refund more than \$80 million to consumers, stop charging illegal overdraft fees, and pay a \$15 million civil penalty. The order was terminated on July 1, 2025; the termination included all redress obligations not completed as of the day the order was terminated as well as a waiver of noncompliance.
5. [Toyota Motor Credit Corporation](#) (consent order filed November 20, 2023): In 2023, the Bureau ordered Toyota Motor Credit Corporation to pay \$60 million in consumer redress and penalties for operating an illegal scheme to prevent borrowers from cancelling product bundles that increased their monthly car loan payments. The company withheld refunds or refunded incorrect amounts on the bundled products and knowingly tarnished consumers' credit reports with false information. Toyota Motor Credit was ordered to stop its unlawful practices, pay \$48 million to harmed consumers, and pay a \$12 million penalty into the CFPB's victims relief fund. The order was terminated on May 12, 2025; the termination included all redress obligations not completed as of the day the order was terminated as well as a waiver of noncompliance.

6. [Bank of America Home Mortgage Disclosure Act](#) (consent order issued November 28, 2023): The Bureau ordered Bank of America to pay a \$12 million penalty for violations of the Home Mortgage Disclosure Act. For at least four years, hundreds of Bank of America loan officers failed to ask mortgage applicants certain demographic questions as required under federal law, and then falsely reported that the applicants had chosen not to respond. On June 5, 2025, the Bureau terminated the order, including provisions related to ongoing monitoring.
7. [Trident Mortgage Company](#) (consent order issued September 14, 2022): The Bureau along with the Department of Justice filed a complaint and consent order to resolve allegations that Trident redlined majority-minority neighborhoods through its marketing, sales, and hiring actions. Specifically, Trident's actions discouraged prospective applicants from applying for mortgage and refinance loans in the greater Philadelphia area's majority-minority neighborhoods. The settlement required Trident to pay a \$4 million civil penalty to the CFPB to use for the CFPB's victims' relief fund. The Bureau [terminated the order](#) with prejudice on June 2, 2025.
8. [Townstone Financial, Inc. and Barry Sturner](#) (motion pending) (complaint filed July 15, 2020; motion to vacate the judgment filed March 26, 2025): In 2020, the Bureau filed a lawsuit alleging that Townstone engaged in discriminatory acts or practices violating the Equal Credit Opportunity Act (ECOA). In November 7, 2024, the court entered a stipulated final judgment and order against Townstone, which prohibits Townstone from engaging in any acts or practices that violate ECOA, maintain policies and procedures to comply with ECOA, and pay a \$105,000 civil money penalty. On March 26, the Bureau sought to vacate the judgment and return the penalty paid by Townstone. On June 12, 2025, the court [denied](#) the CFPB's motion to vacate the judgement.
9. [Trustmark National Bank](#) (complaint and consent order filed October 22, 2021; [termination of consent order](#) sought May 20, 2025): The CFPB and DOJ, with cooperation by the OCC, alleged that Trustmark discriminated against Black and Hispanic neighborhoods by deliberately not marketing, offering, or originating home loans to consumers in majority-Black and Hispanic neighborhoods in the Memphis metropolitan area. The CFPB and DOJ also allege that Trustmark discouraged consumers residing in or seeking credit for properties located in these neighborhoods from applying for credit.
10. [Synchrony Bank, f/k/a GE Capital Retail Bank](#) (consent order filed June 19, 2014) (consent order terminated May 12, 2025): The Bureau ordered GE Capital Retail Bank, now known as Synchrony Bank, to provide an estimated \$225 million in relief to consumers harmed by illegal and discriminatory credit card practices. On May 12, 2025, the Bureau terminated the consent order, in part because this Consent Order relied in part

on a disparate impact theory of liability and its “termination is appropriate to align with the Executive Order 14281.”

### **Public Enforcement Actions Still Active**

1. [Experian Information Solutions, Inc.](#): (filed Jan. 7, 2025): The Bureau sued Experian for sham investigations of credit report errors, including not properly investigating disputes and failing to remove or reinserting errors on reports, and threatening consumers’ access to credit, employment, and housing.
2. [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.
3. [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. The trust's investors, including PIMCO, objected to the settlement. The trial court denied their motion and they have appealed.
4. [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 discriminatory bait-and-switch land sales and predatory financing. The lawsuit also alleges the company targets Hispanic borrowers with false statements about homesites.
5. [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.
6. [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.
7. [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.

8. [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.
9. [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.
10. [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.
11. [Commonwealth Equity Group, LLC \(d/b/a Key Credit Repair\); Nikitas Tsoukaless \(a/k/a Nikitas Tsoukalis\)](#): (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.
12. [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.
13. [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.

14. [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.
15. [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.
16. [National Credit Systems, Inc.](#).<sup>1</sup> (**CID Enforcement Action**) (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.

---

<sup>1</sup> The court granted the CFPB's petition in part in February 2025, terminating the case at that time. The CFPB and NCS subsequently sought relief from the judgment. The court granted the requested relief, stating that NCS would be required to comply upon written notice from the CFPB of its intent to proceed with the investigation.