



## MEMORANDUM

**DATE:** October 15, 2025

**TO:** Interested Parties

**FROM:** Consumer Federation of America  
Protect Borrowers

**RE:** **Trump-Led CFPB Pardons Ten Repeat Offender Corporations**

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In the midst of Acting Consumer Financial Protection Bureau (CFPB) Director Russell Vought's decimation of the Bureau, he and Trump have doled out **22** corporate pardons to Wall Street banks, predatory lenders, and their wealthy executives. **Ten** of these pardons were provided to repeat offender corporations who have a track record of breaking the law.

Since the last publication of this memo, Vought's CFPB has gone even further to reach back in time and abolish or modify orders in 20 settled enforcement actions, including **eight** cases where repeat offenders agreed to compensate victims and pay fines for their misconduct. These corporate pardons and terminated orders deprive consumers of **billions of dollars** that should have been returned to them as a result of misconduct.

These repeat offenders have already paid out **over \$7 billion** as a result of CFPB and other regulators' enforcement actions. This memo identifies repeat offenders<sup>1</sup> subject to CFPB enforcement actions that were pending when the Trump administration took over the CFPB, including their rap sheet, organized by the status of their Trump-administration pardon. The memo also identifies consent orders against repeat offenders that have been terminated or modified by the Trump administration.

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<sup>1</sup> Companies or individuals that were named as defendants in prior CFPB enforcement actions, or in state attorney general enforcement actions for the same pattern of conduct as alleged in the pending or recently dismissed CFPB action.

## **PARDONED REPEAT OFFENDERS**

### **1. Wells Fargo**

**Dismissed Case:** [Early Warning Services, LLC; Bank of America, N.A.; JPMorgan Chase Bank, N.A.; Wells Fargo Bank, N.A.](#): (filed Dec. 20, 2024, permanently dismissed on March 4, 2025)

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.

**Rap Sheet:** At \$4.8 billion, Wells Fargo holds the record for highest penalties paid by a CFPB-regulated entity. It has twice held the record for the highest fine in an individual action, in September 2016 and December 2022.

- [In 2015](#), Wells Fargo was ordered to pay over \$34 million—\$10.8 million in consumer relief and \$24 million in fines—for the leading role it played in an illegal kickback scheme, where its loan officers took cash, marketing materials, and consumer information in exchange for business referrals.
- [In August 2016](#), Wells Fargo was ordered to pay \$4 million—\$410,000 in consumer relief and \$3.6 million in fines—for illegal private student loan servicing practices that increased costs and unfairly penalized certain student loan borrowers.
- [In September 2016](#), Wells Fargo was ordered to pay \$100 million to the CFPB's civil penalty fund and an additional \$85 million to other regulators for its widespread illegal practice of secretly opening unauthorized deposit and credit card accounts.
- [In April 2018](#), Wells Fargo was ordered to pay a \$1 billion penalty for illegally charging fees in connection with mortgage rate-lock extensions, and for imposing unlawful fees and premiums for force-placed collateral insurance on its auto loans.
- [In December 2022](#), Wells Fargo was ordered to pay the largest amount in the CFPB's history: \$3.7 billion—\$2 billion in consumer relief and \$1.7 billion in fines—for repeatedly misapplying loan payments, wrongfully foreclosing on homes illegally repossessing vehicles, incorrectly assessing fees and interest, charging surprise overdraft fees, and other illegal activity affecting over 16 million consumer accounts.

### **2. Bank of America**

**Dismissed Case:** [Early Warning Services, LLC; Bank of America, N.A.; JPMorgan Chase Bank, N.A.; Wells Fargo Bank, N.A.](#): (filed Dec. 20, 2024, permanently dismissed March 4, 2025)

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.

**Rap Sheet:** Bank of America, worth trillions of dollars, has been ordered to pay over \$1 billion as a result of numerous CFPB enforcement actions for violating the law.

- [In 2014](#), Bank of America was ordered by the CFPB to pay over \$790 million (\$727 million in consumer relief and \$45 million to the CFPB's civil penalty fund and other regulators) in 2014 for deceiving consumers about its credit card add-on products and unfairly billing consumers for services not performed.
- [In May 2022](#), Bank of America was fined \$10 million (plus at least \$592,000 in consumer relief) by the CFPB in May of 2022 for processing illegal garnishment orders against its customers accounts, resulting in frozen accounts and stolen money.
- [In July 2022](#), Bank of America was fined \$225 million and required to provide hundreds of millions of dollars in consumer redress by the CFPB and the Office of the Comptroller of the Currency (OCC) for botching the disbursement of state unemployment benefits at the height of the pandemic by freezing their accounts with a faulty fraud detection program.
- [In July 2023](#), Bank of America was ordered to pay \$250 million (\$100 million in consumer relief and \$150 million in fines to the CFPB and OCC) for multiple fraudulent practices affecting hundreds of thousands of consumers. Those fraudulent practices included Bank of America wrongfully withholding credit card rewards, double-dipping on fees, and opening accounts without consent.
- [In November 2023](#), Bank of America was fined \$12 million by the CFPB for reporting false mortgage data to the federal government.

### 3. JPMorgan Chase

**Dismissed Case:** [Early Warning Services, LLC; Bank of America, N.A.; JPMorgan Chase Bank, N.A.; Wells Fargo Bank, N.A.](#); (filed Dec. 20, 2024, permanently dismissed March 4, 2025) 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 the alleged fraud tied to payment network's shoddy safeguards.

**Rap Sheet:** JPMorgan Chase has paid over \$600 million in fines and restitution to the CFPB and 47 state attorneys general for its illegal behavior.

- [In 2013](#), JPMorgan Chase and Chase Bank, USA were ordered to pay \$309 million to over 2 million consumers for unfairly billing consumers for certain credit card "add-on products" (credit monitoring services) that they did not receive.
- [In January 2015](#), JPMorgan Chase was ordered to pay \$900,000 in consumer relief and fines for its role in an illegal kickback scheme, where its loan officers took cash, marketing materials, and consumer information in exchange for business referrals.

- [In July 2015](#), the CFPB and 47 states ordered JPMorgan Chase to pay over \$200 million in consumer relief and penalties to the CFPB and states for selling “zombie” credit card debts to third-party debt buyers and illegally robo-signing court documents.
- [In 2017](#), JPMorgan Chase was fined \$4.6 million for failing to have the required processes to report checking account information accurately and keeping consumers in the dark about reporting disputes and application denials.

#### 4. Capital One Bank, NA

**Dismissed Case:** [Capital One Bank, N.A.](#): (filed Jan. 14, 2025, dismissed on February 27, 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.

**Rap Sheet:** The CFPB’s first ever bank enforcement action was against Capital One Bank [in July 2012](#) for using deceptive marketing tactics to pressure or mislead consumers into paying for “add-on products” such as payment protection and credit monitoring when they activated their credit cards. The Bureau ordered Capital One to pay \$165 million—\$140 million in redress to two million customers and a \$25 million penalty.

#### 5. Pennsylvania Higher Education Assistance Agency

**Dismissed Case:** [Pennsylvania Higher Education Assistance Agency \(PHEAA\) d/b/a American Education Services or AES](#): (filed May 31, 2024, dismissed on February 28, 2025) 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.

**Rap Sheet:**

- Earlier in 2024, the CFPB [ordered PHEAA to pay more than \\$5 million](#) along with the National Collegiate Student Loan Trusts (NCSLTs) for student loan servicing failures. In this case, the defendants ignored student loan borrowers seeking payment relief, including during the COVID-19 national emergency. The NCSLTs were originally set up by the big banks to push risks onto investors from this bank-led predatory student lending scheme, and include student loans from [Bank of America, JPMorgan, and a bank now owned by Citizens Bank](#). In response to the CFPB’s concerns about illegal debt collection practices, the NCSLTs repeatedly argued in court that they were not debt collectors because they contracted out all of their functions so federal financial laws did not apply to them. Fortunately, the Supreme Court [agreed](#) that just because the NCSLTs do not have

employees does not mean that the entities or their subcontractors are exempt from the law.

- Several states have also ordered PHEAA to correct past mistakes and provide remediation directly to borrowers. For example, in 2021, [the State of Massachusetts reached a settlement with PHEAA](#) related to widespread errors and delays and in 2022, the State of New York reached a similar [settlement](#) requiring PHEAA to automatically review thousands of accounts to find and correct prior errors and provide over \$110 million in debt relief directly to borrowers.

## 6. TransUnion

**Dismissed Case:** [TransUnion; Trans Union, LLC; TransUnion Interactive, Inc.](#); and John T. Danaher: (filed Apr. 12, 2022, dismissed on Feb. 28, 2025) 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.

**Rap Sheet:** TransUnion and its related entities have been fined by the Bureau multiple times for its subscription plans. The pending case that was permanently dismissed on February 28 included allegations that TransUnion intentionally violated the 2017 order below.

- [In 2017](#), TransUnion was ordered to pay \$16.9 million in consumer relief and penalties for deceiving consumers about the usefulness and actual cost of credit scores it sold to consumers and for luring consumers into costly recurring payments for credit-related products with false promises.
- [In 2023](#), the FTC and CFPB ordered TransUnion and its rental screening company subsidiary to pay \$15 million for failing to take steps to ensure that rental background checks were accurate and for withholding, from renters, the names of third parties that were providing the inaccurate information. The CFPB imposed an additional \$8 million fine in a separate action alleging that TransUnion was lying to consumers about timely placing or removing security freezes and locks on the credit reports.

## 7. 1st Alliance

**Dismissed Case:** [1st Alliance Lending, LLC, John Christopher DiIorio, Kevin Robert St. Lawrence, and Socrates Aramburu](#): (filed Jan. 15, 2021, dismissed on Feb. 28, 2025) 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.

**Rap Sheet:** In 2014, [1st Alliance was ordered to pay \\$83,000](#) for violating federal law by illegally splitting real estate settlement fees.

## 8. Moneygram

**Dismissed Case:** [MoneyGram International, Inc. and MoneyGram Payment Systems, Inc.](#): (filed Apr. 21, 2022, CFPB withdrew on April 8, 2025) The CFPB and New York’s Attorney General sued 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 withdrew from the case on April 8, 2025, and the New York Attorney General settled with Moneygram for a total of \$250,000.

**Rap Sheet:** MoneyGram has been subject to numerous orders from the Federal Trade Commission and Department of Justice for a litany of financial crimes.

- [In 2009](#), MoneyGram was fined \$18 million related to fraud charges brought by the Federal Trade Commission, and was ordered to implement a comprehensive anti-fraud and agent-monitoring program.
- [In 2012](#), MoneyGram agreed to forfeit \$100 million and enter into a deferred prosecution agreement with the Department of Justice, admitting it criminally aided and abetted wire fraud and failed to maintain an effective anti-money laundering program. MoneyGram also violated that agreement. MoneyGram has also faced other law enforcement actions leading to significant redress and penalties.
- [In 2018](#), after it was given ample time to implement the 2009 FTC order, MoneyGram had to pay \$125 million to settle allegations that it failed to do so.

## 9. Populus Financial/Ace Cash Express

**Dismissed Case:** [Populus Financial Group, Inc., d/b/a ACE Cash Express, Inc.](#) (filed July 12, 2022, dismissed on April 30, 2025): 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.

**Rap Sheet:** In 2014, [ACE Cash Express was ordered by the CFPB](#) to pay \$10 million in consumer relief and penalties for using illegal debt collection tactics—including harassment and false threats of lawsuits or criminal prosecution—to pressure overdue borrowers into taking out additional loans they could not afford.

## 10. National Collegiate Student Loan Trusts

**Dismissed Case:** [National Collegiate Student Loan Trusts](#): (filed Sept. 18, 2017, dismissed on April 29, 2025) 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.

**Rap Sheet:** Earlier in 2024, the CFPB [ordered PHEAA to pay more than \\$5 million](#) along with the National Collegiate Student Loan Trusts for student loan servicing failures. The CFPB's investigation revealed that defendants ignored and mishandled thousands of student loan borrowers' requests seeking payment relief, including during the COVID-19 national emergency.

## **TERMINATED/MODIFIED CONSENT ORDERS AGAINST REPEAT OFFENDERS**

### 1. Regions Bank

**Terminated Order:** [Regions Bank](#) (consent order issued September 28, 2022, terminated July 21, 2025): The Bureau ordered Regions Bank to pay \$50 million into the CFPB's victims relief fund and to refund at least \$141 million to customers harmed by its illegal surprise overdraft fees. From August 2018 through July 2021, Regions charged customers surprise overdraft fees on certain ATM withdrawals and debit card purchases. The bank charged overdraft fees even after telling consumers they had sufficient funds at the time of the transactions. The Bureau terminated the order, including all compliance obligations, on July 21, 2025.

**Rap Sheet:** In 2015, the [Bureau fined Regions Bank \\$7.5 million](#) for charging overdraft fees to consumers who had not opted-in for overdraft coverage. Regions also charged overdraft and non-sufficient funds fees on its deposit advance product despite claims that it would not. Regions voluntarily refunded at least \$49 million to victims before and during the CFPB's investigation and enforcement action.

### 2. Navy Federal Credit Union

**Terminated Order:** [Navy Federal Credit Union](#) (consent order filed November 7, 2024, terminated July 1, 2025): In 2024, the Bureau took action against Navy Federal 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.

**Rap Sheet:** In 2016, Navy Federal was [ordered to pay \\$5.5 million in fines](#) and \$23 million in redress to its members, including active-duty military, retired servicemembers, and their families. Navy Federal falsely threatened to sue its members and garnish their wages, threatened to contact commanding officers in order to coerce payment, misrepresented the consequences of delinquency, and illegally froze access to members' accounts.

### 3. Bank of America

**Terminated Order:** [Bank of America Home Mortgage Disclosure Act](#) (consent order issued November 28, 2023, terminated on June 5, 2025): 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.

**Rap Sheet:** Bank of America has been ordered to pay over \$1 billion as a result of numerous CFPB enforcement actions for violating the law in 2014, 2022 and 2023, as described above in Pardoned Repeat Offenders, #2.

### 4. Fay Servicing

**Terminated Order:** [Fay Servicing, LLC](#) (consent order filed Nov. 20, 2023, terminated on May 12, 2025). In 2024, the Bureau issued an order against Fay Servicing for violating a prior Bureau enforcement order entered in June 2017, violating 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 2024 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.

**Rap Sheet:** In 2017, Fay Servicing was [ordered to pay consumers up to \\$1.15 million](#) in an enforcement action where the Bureau found that it failed to provide borrowers with foreclosure protections required by law.



## 5. Toyota Motor Credit Corporation

**Terminated Order:** [Toyota Motor Credit Corporation](#) (consent order filed Nov. 20, 2023, terminated on May 12, 2025): In 2023, the Bureau ordered Toyota 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 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.

**Rap Sheet:** In 2016, the CFPB and Department of Justice [fined Toyota Motor Credit Corporation](#) for allegations that it imposed higher auto loan interest rates on thousands of African-American and Asian and Pacific Islander borrowers than on white borrowers, without regard to their creditworthiness. Toyota Motor Credit was ordered to pay up to \$21.9 million in restitution.

## 6. Washington Federal Bank entered into two consent orders in 2013 and 2020, both of which were terminated by the Bureau during the Trump administration

**Terminated 2013 Order:** [Washington Federal Bank](#) (consent order filed October 9, 2013, terminated on September 22, 2025): In 2013, the Bureau issued an order against Washington Federal, a bank headquartered in Seattle, Washington. The Bureau found that Washington Federal reported inaccurate data about its mortgage transactions for 2011, in violation of the Home Mortgage Disclosure Act (HMDA), its implementing regulation, Regulation C, and the Consumer Financial Protection Act of 2010. Washington Federal was fined \$34,000 for its conduct. The Bureau terminated the order on September 22, 2025.

**Terminated 2020 Order:** [Washington Federal Bank](#) (consent order issued October 27, 2020, terminated on September 22, 2025): the Bureau issued an order against Washington Federal Bank, N.A., a federally insured, for-profit national bank headquartered in Seattle, Washington. The Bureau found that Washington Federal reported inaccurate data about its mortgage transactions for 2016 and 2017, in violation of the Home Mortgage Disclosure Act (HMDA), its implementing regulation, Regulation C, and the Consumer Financial Protection Act of 2010. Washington Federal was fined \$200,000 for its conduct. The Bureau terminated the order on September 22, 2025.

7. **U.S. Bank** entered into two consent orders in 2022 and 2023, both of which were terminated by the Bureau during the Trump administration.

**Terminated 2022 Order:** [U.S. Bank Sales Practices](#) (consent order issued July 28, 2022, terminated on August 21, 2025): In 2022, the Bureau issued a consent order against U.S. Bank National Association, a national bank headquartered in Minneapolis, Minnesota. The Bureau found that U.S. Bank issued credit cards and lines of credit and opened deposit accounts for certain consumers without their knowledge and consent and without required applications and disclosures in violation of the Truth in Lending Act, Truth in Savings Act, and their implementing regulations, and the Consumer Financial Protection Act of 2010. The Bureau further found that U.S. Bank violated the Fair Credit Reporting Act by using or obtaining consumer reports without a permissible purpose in connection with unauthorized applications for credit cards. This case resulted in a consent order fining U.S. Bank \$37.5 million and requiring it to make harmed consumers whole. The Bureau terminated the order on August 21, 2025.

**Terminated 2023 Order:** [U.S. Bank Unemployment](#) (consent order issued December 19, 2023, terminated on September 22, 2025) In 2023, the Bureau ordered U.S. Bank to provide \$5.7 million in redress to consumers and a \$15 million civil money penalty for freezing thousands of accounts and preventing out-of-work consumers from accessing their unemployment benefits at the height of the Covid-19 pandemic through its ReliaCard prepaid debit card program. The OCC concurrently issued an order fining U.S. Bank \$15 million. This case also resulted in a consent order, entered on December 19, 2023 that the current CFPB administration terminated on September 22, 2025.

## 8. Enova

**Terminated Order:** [Enova](#) (consent order issued November 15, 2023, terminated on September 2, 2025): The Bureau 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. In 2019, the Bureau issued an order against Enova based on the Bureau's finding that Enova violated the Consumer Financial Protection Act of 2010 (CFPA) by debiting consumers' bank accounts without authorization and failing to honor loan extensions it granted to consumers. The Bureau found that Enova violated the 2019 Order and the CFPA, including by debiting or attempting to debit consumers' accounts without their authorization. The Bureau terminated the order on September 2, 2025.

**Rap Sheet:** In 2019, Enova was [fined \\$3.2 million](#) for debiting consumers' bank accounts without authorization in connection with its unsecured payday and installment loans and lines of credit.

## **REPEAT OFFENDERS TO WATCH**

### **1. Experian**

**Pending Case:** [Experian Information Solutions, Inc.](#): (filed Jan. 7, 2025): The Bureau sued Experian for sham investigations of credit report errors. According to the allegations in the suit, Experian does not properly investigate disputes, and fails to remove or even reinserts errors on reports, threatening consumers' access to credit, employment, and housing.

**Rap Sheet:** Experian was [fined \\$3 million in 2017](#) for deceptively marketing its credit scores, and for violating the Fair Credit Reporting Act by requiring its customers to watch Experian advertisements before providing them with their free credit report.