

ISSUE	INSTITUTION	VIOLATIONS/FINDINGS	ACTION	AGENCY	DATE	PENALTY/ CORRECTIVE ACTION
MLA Regulation E UDAAP	Omni Financial of Nevada, Inc. Las Vegas, Nevada	The Bureau found that Omni violated the Military Lending Act’s prohibition on requiring repayment of loans by allotment. The Bureau also found that Omni violated the Electronic Fund Transfer Act’s (EFTA) prohibition against requiring that consumers preauthorize electronic fund transfers as a condition of receiving credit. The Bureau further found that these violations of EFTA constituted violations of the Consumer Financial Protection Act of 2010.	Consent Order	CFPB	12/30/21	
FCRA	Santander Consumer USA Inc.	Bureau found that between January 2016 and August 2019 Santander violated the Fair Credit Reporting Act (FCRA) and Regulation V by furnishing consumer loan information to CRAs that it knew or reasonably should have known was inaccurate; failing to promptly update and correct information it furnished that it later determined was incomplete; failing to provide the date of first delinquency on certain delinquent or charged-off accounts; and failing to establish and implement reasonable written policies and procedures regarding the accuracy and integrity of information provided to CRAs. These violations of the FCRA and Regulation V constituted violations of the Consumer Financial Protection Act of 2010 and could have negatively impacted consumers’ credit scores and access to credit in many instances.	Consent Order	CFPB	12/22/20	CMP: \$4,750,000

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Regulation X UDAAP Regulation E	Seterus, Inc. and Kyanite Services, Inc.	<p>The Bureau found Seterus:</p> <ul style="list-style-type: none"> Violated the Consumer Financial Protection Act prohibition of unfair acts and practices by systematically failing to accurately review, process, track, and communicate to borrowers information regarding their applications, and deceptive acts and practices by sending numerous borrowers acknowledgment notices regarding their applications that misrepresented the status of borrower documents and provided inaccurate due dates for submission of borrower documents. T Violated Regulation X by sending numerous acknowledgment notices that failed to state the additional documents and information borrowers needed to submit to complete their loss mitigation applications or failed to provide a reasonable due date for submission of borrower documents; failing to exercise reasonable diligence in obtaining documents/information necessary to complete loss mitigation applications; failing to properly evaluate for all loss mitigation options available to the borrower; and failing to treat certain applications as “facially complete” when required under Regulation X. Engaged in unfair acts and practices by withdrawing payments from consumers’ accounts without valid authorization and by cancelling or not withdrawing payments without notifying consumers. This conduct violated the Consumer Financial Protection Act of 2010 (CFPA), the Electronic Fund Transfer Act, and Regulation E. 	Consent Order	CFPB	12/22/20	Redress: \$4,932,525 CMP: \$500,000

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FCRA	Alder Holdings, LLC	The complaint alleged that Alder, in extending credit to its customers for its home-alarm products and services, violated the Fair Credit Reporting Act and Regulation V by charging customers who had lower credit scores higher activation-fees, but failing to provide those customers with the required risk-based pricing notice. Arkansas also alleged that Alder violated the Consumer Financial Protection Act of 2010 (CFPA).	Complaint	CFPB	12/11/20	f entered by the court, the settlement would require Alder to pay a \$600,000 civil money penalty, \$100,000 of which will be offset if Alder pays that amount to settle related litigation with the State of Arkansas that is currently pending in state court in Arkansas. The settlement would also require Alder to provide proper notices under FCRA.

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FDCPA and UDAAP	RAB Performance Recoveries, LLC	<p>Bureau found that during the period that RAB was obtaining judgments against consumers, RAB threatened to sue, sued, and demanded payment from consumers in Connecticut, New Jersey, and Rhode Island even though RAB did not hold the licenses that those states required to sue to collect debts. Thus, RAB was not legally entitled to take the actions that it threatened to take against consumers in those states. The Bureau found that RAB misrepresented that it had a legally enforceable right to recover payments from consumers in these states through the judicial process in violation of the Fair Debt Collection Practices Act (FDCPA) and the Consumer Financial Protection Act of 2010 (CFPA).</p>	Consent Order	CFPB		<ul style="list-style-type: none"> • CMP: \$204,000 • Prohibited from collecting on the judgments against, or payment agreements from, consumers it obtained in Connecticut, New Jersey, and Rhode Island when RAB did not hold a required debt-collection license in those states. • It also requires RAB to take all necessary steps to vacate those judgments and suspend collection of those judgments and to notify consumers with payment agreements that they have been satisfied.

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UDAAP	Nationstar Mortgage, LLC d/b/a Mr. Cooper, Coppell, TX	<p>The Bureau alleges that Nationstar violated multiple Federal consumer financial laws, causing substantial harm to the borrowers whose mortgage loans it serviced, including distressed homeowners. Nationstar is one of the nation’s largest mortgage servicers and the largest non-bank mortgage servicer in the United States.</p> <p>The Bureau brings this action against Defendant under: (1) Sections 1031 and 1036 of the Consumer Financial Protection Act (“CFPA”), 12 U.S.C. §§ 5531, 5536; (2) Sections 6 and 19 of the Real Estate Settlement Procedures Act (“RESPA”), 12 U.S.C. §§ 2605, 2617, and the regulations promulgated thereunder at Regulation X, 12 C.F.R. § 1024 et seq. (“RESPA Mortgage Servicing Rule”); and (3) Sections 4902(a) and (b) of the Homeowners Protection Act of 1998, 12 U.S.C. §§ 4902(a) and 4902(b) (“HPA”).</p>	Complaint/ Proposed Judgement	CFPB	12/7/20	The proposed judgment and order, which the court entered on December 8, 2020, requires Nationstar to pay approximately \$73 million in redress to more than 40,000 harmed borrowers. It also requires Nationstar to pay a \$1.5 million civil penalty to the Bureau.

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MLA	LendUp Loans, LLC Oakland, CA	The Bureau alleged that LendUp violated the Military Lending Act (MLA) in connection with its extensions of credit. The Bureau alleged that since October 2016, LendUp has made over 4,000 single-payment or installment loans to over 1,200 covered borrowers in violation of the MLA. The Bureau specifically alleged that LendUp’s violations of the MLA include extending loans with an annual percentage rate that exceeds the MLA’s 36% cap, extending loans that require borrowers to submit to arbitration, and failing to make certain required loan disclosures.	Complaint/ Judgement	CFPB	12/4/20	<p>\$300,000 in redress to consumers and to pay a \$950,000 civil money penalty</p> <p>LendUp prohibited from committing future violations of the MLA and from collecting on, selling, or assigning any debts arising from loans that failed to comply with the MLA. It also requires LendUp to correct or update the information it provided to consumer reporting agencies about affected consumers.</p>
UDAAP	DMB Financial, LLC Beverly, Massachusetts	The Bureau alleges that in connection with its debt-settlement and debt-relief services, DMB engaged in abusive and deceptive acts or practices in violation of the Telemarketing Sales Rule (TSR) and deceptive acts and practices in violation of the Consumer Financial Protection Act of 2010 (CFPA). The Bureau also alleges that DMB’s alleged TSR violations also constitute violations of the CFPA.	Complaint	CFPB	12/1/20	Bureau’s complaint seeks an injunction, as well as redress to consumers, disgorgement of ill-gotten gains, and the imposition of civil money penalties.

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UDAAP	U.S. Equity Advantage, Inc. Orlando, FL and Robert M. Steenbergh	Auto loan payment program called AutoPayPlus that charges fees to deduct payments from consumers' bank accounts every two weeks and then forwards these payments every month to the consumers' lenders. The Bureau found that the company's disclosures and advertisements of its loan payment program contained misleading statements	Consent Order	CFPB	11/20/20	Monetary Relief: \$9,300,000 (suspended with payment of \$900,000) CMP: \$1
FCRA	Afni, Inc.	CFPB found Afni: <ul style="list-style-type: none"> Violated the Fair Credit Reporting Act (FCRA)/Regulation V, by furnishing information to CRAs that it knew or had reasonable cause to believe was inaccurate; Failing to report to CRAs an appropriate date of first delinquency on certain accounts; Failing to conduct reasonable investigations of disputes made by consumers both to Afni and to CRAs about furnished information or failing to conduct investigations of disputes made to Afni in a timely manner; Failing to send required notices to consumers about the results of such investigations; and Failing to establish, implement, and update its policies and procedures regarding its furnishing of consumer information to CRAs. 	Consent Order	CFPB	11/12/20	CMP: \$500,000 Improve and ensure the accuracy of its furnishing and its policies and procedures relating to credit reporting and dispute investigation.

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UDAAP	SMART Payment Plan, LLC, Austin, TX	SMART operates a loan payment program for auto loans called the SMART Plan that deducts payments from consumers' bank accounts every two weeks and then forwards these payments every month to the consumers' lenders. The Bureau found that SMART's disclosures of the terms for the SMART Plan contained misleading statements.	Complaint	CFPB	11/5/20	Redress: \$7.5 Mill (suspended at payment of \$1.5 Mill) CMP: \$1
Flood	State Farm Bank, F.S.B. Bloomington, Illinois	<ul style="list-style-type: none"> A pattern or practice of violation of the Flood Act and its implementing regulations, specifically 12 C.F.R. § 22.3 (requirement to purchase) and 12 C.F.R. § 22.7 (force-placement). 	CMP	OCC	11/4/20	CMP: \$547,200.00
Flood	USAA Federal Savings Bank San Antonio, Texas	<ul style="list-style-type: none"> A pattern or practice of violations of the Flood Act and its implementing regulations, specifically 12 C.F.R. § 22.7(a) (force placement). 	CMP	OCC	11/11/20	CMP: \$382,500
Flood	Farmers Bank & Trust Company Blytheville, Arkansas	Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, which implements the requirements of the Act	CMP	FRB	11/10/20	CMP: \$12,000
Flood	Manufacturers And Traders Trust Company, Buffalo, New York	Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, which implements the requirements of the Act.	CMP	FRB	10/14/20	CMP: \$546,000

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UDAAP	Nissan Motor Acceptance Corporation, Irvin, TX	CFPB found that Nissan and its agents: <ul style="list-style-type: none"> • Wrongfully repossessed vehicles; • Kept personal property in consumers' repossessed vehicles until consumers paid a storage fee; • Deprived consumers paying by phone of the ability to select payment options with significantly lower fees and, • Made a deceptive statement in loan extension agreements that appeared to limit consumers' bankruptcy protections. 	Consent order	CFPB	10/13/20	Redress: \$ 1 Million CMP: \$4 Million
Flood	Fortifi Bank Berlin, Wisconsin	A pattern or practice of committing violations of the FDPA and/or the notice requirements under section 1364 of the National Flood Insurance Act of 1968, 42 U.S.C. § 4104a, and/or Part 339 of the FDIC's Rules and Regulations, 12 C.F.R. Part 339, by violating: <ul style="list-style-type: none"> • Section 339.3(a) of the FDIC Rules and Regulations, 12 C.F.R. § 339.3(a), by allowing flood insurance to lapse during the term of the loan in one instance; and failing to obtain adequate flood insurance in four instances; • Section 339.5(a)(4) of the FDIC Rules and Regulations, 12 C.F.R. § 339.5(a)(4), by failing to escrow funds for insurance premiums in nine instances; and • Section 339.9(a)(4) of the FDIC Rules and Regulations, 12 C.F.R. § 339.5(a)(4), by failing to provide written notice of flood insurance at renewal in thirteen instances. 	CMP	FDIC	9/24/20	CMP: \$15,375.00

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UDAAP	Lobel Financial Corporation, Anaheim, CA	<p>When a borrower has insufficient insurance, rather than force-placing collateral-protection insurance, Lobel places the LDW product, which is not itself insurance, on borrower accounts and charges a monthly premium. The LDW product provides that Lobel will pay for the cost of covered repairs and, in the event of a total vehicle loss, cancel the borrower's debt. The Bureau's investigation found that, since 2012, Lobel charged customers LDW premiums after they had become ten-days delinquent on their auto loans but did not provide them with LDW coverage. The Bureau also found that Lobel charged some customers LDW-related fees that Lobel had not disclosed in its LDW contract and that these practices were unfair under the CFPB.</p>	Consent Order	CFPB	9/21/20	Redress: \$1,345,224 CMP: \$100,000 Prohibited from failing to provide consumers with LDW coverage or similar products or services for which it has charged consumers or from charging consumers fees that are not authorized by its LDW contracts.

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UDAAP	PEAKS Trust 2009-1 et al	CFPB alleged that PEAKS provided substantial assistance to ITT Educational Services, Inc. (ITT) in engaging in unfair acts and practices in violation of the Consumer Financial Protection Act of 2010. PEAKS owned and managed private loans for students at ITT Technical Institute. PEAKS allegedly knew or was reckless in not knowing that many student borrowers did not understand the terms and conditions of those loans, could not afford them, or in some cases did not even know they had them.	Complaint	CFPB	9/15/20	If entered by the court, the proposed stipulated judgment would require PEAKS to <ul style="list-style-type: none"> • Stop collecting PEAKS loans (est. \$330 M) • Discharge all outstanding PEAKS loans, and • Ask all consumer reporting to delete information relating to PEAKS loans.
Flood	Fortifi Bank Berlin, Wisconsin	Bank has engaged in a pattern or practice of committing violations of the flood rules by violating: <ul style="list-style-type: none"> • Section 339.3(a) of the FDIC Rules and Regulations, 12 C.F.R. § 339.3(a), by allowing flood insurance to lapse during the term of the loan in one instance; and failing to obtain adequate flood insurance in four instances; • Section 339.5(a)(4) of the FDIC Rules and Regulations, 12 C.F.R. §339.5(a)(4), by failing to escrow funds for insurance premiums in nine instances; and • Section 339.9(a)(4) of the FDIC Rules and Regulations, 12 C.F.R. §339.5(a)(4), by failing to provide written notice of flood insurance at renewal in thirteen instances. 	CMP	FDIC	9/14/20	CMP: \$15,375

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Flood	Wisconsin River Bank Sauk City, WI	Bank has engaged in a pattern or practice of committing violations of the FDPA and the notice requirements under section 1364 of the National Flood Insurance Act of 1968, 42 U.S.C. § 4104a, and Part 339 of the FDIC’s Rules and Regulations, 12 C.F.R. Part 339 as follows: <ul style="list-style-type: none"> • 12 C.F.R. § 339.3(a), by failing to obtain adequate flood insurance at the time of the origination of twenty-five (25) loans; and • 12 C.F.R. § 339.9(a), by failing to provide to borrowers a Notice of Special Flood Hazards and Availability of Federal Disaster Relief Assistance when making, increasing, extending or renewing a loan on twenty-four (24) occasions. 	CMP	FDIC	9/11/20	CMP: \$18,500
CFPA, FDCPA, FCRA	Encore Capital Group, Midland Funding, Midland Credit Management, and Asset Acceptance Capital Corp. San Diego, CA	Encore and its subsidiaries are currently subject to a 2015 consent order with the Bureau based on the Bureau’s previous findings that they violated the Consumer Financial Protection Act (CFPA), Fair Debt Collection Practices Act (FDCPA), and the Fair Credit Reporting Act. The Bureau alleged that Encore and its subsidiaries have violated the terms of this consent order and again violated the FDCPA and CFPA. On October 15, 2020, the Bureau filed a proposed stipulated final judgment and order to settle the lawsuit. If entered by the court, the stipulated final judgment and order will require Encore and its subsidiaries to pay	Complaint/ Stipulated Judgement and Order	CFPB	9/8/20	Redress: \$79,308.81 CMP: \$15 million Make various material disclosures to consumers, refrain from the collection of time-barred debt absent certain disclosures to consumers, and abide by certain conduct provisions in the 2015 consent order for five more years.

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UDAAP MAP Rule Regulation Z	Prime Choice Funding, Inc (CA) * Sovereign Funding Group, Inc. * Go Direct Lenders, Inc. * PHLoans.com, Inc. * Service 1st Mortgage, Inc. * Hypotec, Inc. * Accelerate Mortgage, LLC Clear Path Lending Low VA Rates	Bureau alleges Prime Choice: <ul style="list-style-type: none"> sent consumers millions of mailers for VA-guaranteed mortgages that contained false, misleading, and inaccurate statements or that lacked required disclosures, in violation of the prohibition against deceptive acts and practices, the Mortgage Acts and Practices – Advertising Rule (MAP Rule), and Regulation Z. sent consumers numerous advertisements for VA-guaranteed mortgages that, among other things, misrepresented the credit terms of the advertised mortgage, misleadingly described an adjustable-rate mortgage as having a “fixed” rate, falsely stated that the consumer had been prequalified for the advertised mortgage, created the false impression that company was affiliated with the government, used the name of the consumer’s current lender in a misleading way, and failed to include multiple disclosures required by Regulation Z. <p>*Found to have the same or similar violations as Prime Choice. Additional and different issues may also have been part of consent order.</p>	Consent Order	CFPB	7/24/20 through 10/26/20	CMP: Prime - \$645,000 Sovereign - \$460,000 Go Direct - \$150,000 PHLoans - \$260,000 Hypotec - \$50,000 Accelerate - \$225,000 Clear Path - \$625,000 Low VA Rates - \$1,800,000 Prevent future violations.

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ECOA/Reg B	Townstone Financial, Inc. Chicago, IL	CFPB alleges: <ul style="list-style-type: none"> • Townstone engaged in acts or practices, including making statements during its weekly radio shows and podcasts through which it marketed its services, that illegally discouraged prospective African-American applicants from applying to Townstone for mortgage loans; • Townstone engaged in illegal redlining by engaging in acts or practices that discouraged prospective applicants living in African-American neighborhoods in the Chicago MSA from applying to Townstone for mortgage loans, including by making discouraging statements during its weekly radio shows and podcasts through which it marketed its services; • Townstone engaged in illegal redlining by engaging in acts or practices that discouraged prospective applicants living in other areas from applying to Townstone for mortgage loans for properties located in African-American neighborhoods in the Chicago MSA, including by making discouraging statements during its weekly radio shows and podcasts through which it marketed its services. 	Complaint	CFPB	7/15/20	CFPB seeks an injunction against Townstone, as well as damages, redress to consumers, and the imposition of a civil money penalty

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Telemarketing Sales Rule	GST Factoring, Inc., et al., Owners Rick Graff and Gregory Trimarche, Champion Marketing Solutions, LLC, California attorneys Amanda Johanson and Jacob Slaughter, Arizona attorney David Mize, and Florida attorney Daniel Ruggiero.	CFPB alleges that the companies, their owners, and the attorneys were part of a nationwide student-loan debt-relief operation that charged thousands of consumers saddled with private student-loan debt approximately \$11.8 million in illegal upfront fees in violation of the Telemarketing Sales Rule (TSR).	Complaint	CFPB	7/13/20	If entered by the court, the proposed orders will permanently ban Trimarche, from providing debt-relief services and telemarketing any consumer financial product or service, and impose permanent debt-relief bans on Slaughter, Mize, and Ruggiero. The proposed orders would also collectively impose an approximate \$11.8 million monetary judgment against the settling defendants for consumer redress, full payment of which will be suspended upon the settling defendants' paying a portion of the redress based on their demonstrated inability to pay the full amount of judgment in each order. Each settling defendant will also pay a \$1 civil money penalty to the Bureau.

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Telemarketing Sales Rule	Timemark, Inc., Deerfield Beach, FL.	CFPB alleges <ul style="list-style-type: none"> • Timemark used telemarketing campaigns to convince consumers to pay up to \$699 in fees to file paperwork to reduce or eliminate their monthly payments for their federal student loans, through loan consolidation, forgiveness, or income-driven repayment plans. (US DoF offers these options to student loan borrowers for free). • Under the TSR, it is illegal to request or receive any fees for debt-relief services sold through telemarketing before the terms of the debt are altered or settled, and the consumer has made at least one payment pursuant to the new arrangement. The Bureau alleges that the defendants violated the TSR because they requested and received payments from consumers within a few days, or at the latest, within 30 days of their enrollment—before the terms of the debts were altered. 	Settlement	CPPB	7/7/20	If entered by the court, the proposed order memorializing the settlement will permanently ban defendants from providing debt-relief services and impose a judgment totaling approximately \$3.8 million in consumer redress and civil money penalties
Flood	Putnam County Bank, Hurricane, Wv	<ul style="list-style-type: none"> • Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, which implements the requirements of the Act 	CMP	FRB	7/2/20	CMP: \$24,500
Flood	Benchmark Community Bank Kenbridge, VA	<ul style="list-style-type: none"> • Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, which implements the requirements of the Act 	CMP	FRB	6/25/20	CMP: \$8,500

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UDAAP Regulation V	Harbour Portfolio Advisors, LLC; National Asset Advisors, LLC; and National Asset Mortgage, LLC	<ul style="list-style-type: none"> • Consumers calling to complain about errors on their consumer reports relating to their financing with Harbour were sometimes told that they had to file a dispute with the consumer-reporting agency. (Deceptive) • NAM Lacked adequate policies and procedures to protect the accuracy and integrity of information furnished to consumer-reporting agencies, in violation of Regulation V. 	Consent Order	CFPB	6/23/20	<ul style="list-style-type: none"> • Harbour CMP: \$25,000 • NAA and NAM Joint CMP: \$10,000 • Companies also agreed not to misrepresent or assist others in misrepresenting, expressly or impliedly, how consumers can resolve errors in their consumer reports or any other material fact concerning their consumer reports.

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Appraisal/ Valuation	First National Bank of Muscatine, Muscatine, IA	<ul style="list-style-type: none"> OCC found unsafe or unsound practices, including those relating to credit underwriting, credit administration, problem loan management, and real estate valuation practices 	Formal Agreement	OCC	6/16/20	<ul style="list-style-type: none"> Real estate valuation policy ensuring that the Bank obtains appropriate real estate appraisals and evaluations and completes adequate appraisal and evaluation reviews. (Refer to ('USPAP'), 12 C.F.R. Part 34, OCC Bulletin 2010-42: "the Interagency Appraisal and Evaluation Guidelines" (December 2010), and OCC Bulletin 2018-39: "Appraisals and Evaluations of Real Estate: Frequently Asked Questions" (October 2018) for guidance.)
Flood	East West Bank, Pasadena, CA	<ul style="list-style-type: none"> Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25. 	CMP	FRB	6/8/20	CMP: \$129,108

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UDAAP/TILA	Main Street Personal Finance, Inc., ACAC, Inc. d/b/a Approved Cash Advance, and Quik Lend, Inc.	<ul style="list-style-type: none"> • Provided deceptive finance charge disclosures in violation of the Consumer Financial Protection Act (CFPA) and the Truth in Lending Act (TILA), • Violated the CFPA and TILA by failing to refund overpayments on its loans, and • Violated the CFPA by engaging in unfair debt collections practices. 	Consent Order	CFPB	6/2/20	<ul style="list-style-type: none"> • \$3.5 million in redress, which amount is suspended upon its payment of \$2 million of that judgment and \$1 civil money penalty to the Bureau based on Approved Cash’s demonstrated inability to pay. • Prohibited from misrepresenting finance charges in its auto-title pledge transactions, requires it to ensure that consumers with credit balances over \$1 are refunded timely, and prohibits it from engaging in the unlawful debt collections practices in which it was engaging.

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UDAAP Telemarketing Sales Rule	Commonwealth Equity Group, LLC (d/b/a Key Credit Repair) (KCR) and Nikitas Tsoukales	<ul style="list-style-type: none"> Bureau alleges that in their telemarketing of credit-repair services, the defendants violated the Consumer Financial Protection Act's (CFPA) prohibition against deceptive acts or practices and the Telemarketing Sales Rule's (TSR) prohibitions on deceptive and abusive telemarketing acts or practices. 	Complaint	CFPB	5/22/20	CFPB seeks: <ul style="list-style-type: none"> Redress Injunctive Relief CMPs Court Costs
RESPA/ Regulation X	Specialized Loan Servicing, LLC Colorado	<ul style="list-style-type: none"> Took prohibited foreclosure actions against mortgage borrowers who were entitled to protection from foreclosure; Failed to send or to timely send evaluation notices to mortgage borrowers who were entitled to them. Obtained foreclosure judgments and conducted foreclosure sales on borrowers' homes when Regulation X would have entitled the borrowers to protection from foreclosure had SLS complied with that rule. 	Consent Order/CMP	CFPB	5/11/20	<ul style="list-style-type: none"> \$775,000 in monetary relief to consumers; Waive \$500,000 in borrower deficiencies; Pay a \$250,000 civil money penalty; and Implement procedures to ensure compliance with RESPA and Regulation X.

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Regulation O Appraisal TILA RESPA Flood HMDA	Bank of Louisiana, New Orleans, LA	<ul style="list-style-type: none"> Failed to comply with 2011 MOU; Bank Vice President was permitted to overdraw his account on twelve occasions but was never charged for the overdrafts; Not maintaining proper paperwork and by allowing the same loan officers underwriting or servicing a loan to appraise the underlying property Failing to provide potential borrowers with accurate and complete Good Faith Estimates and HUD-1 closing statements within the required three-day period; Failed to provide Good Faith Estimates at least seven days before closing. See 2 C.F.R. § 1026.35(b); Did not establish escrow accounts for high priced mortgages; Failed to obtain current flood insurance determinations, failed to send borrowers timely notice, and failed to purchase force-placed insurance when required. HMDA Error rates between 34 – 67 percent; Inadequate compliance program. 	C&D, CMP	FDIC	4/21/20	CMP: \$500,000 <ul style="list-style-type: none"> Increase Board Oversight Add Outside Director Retain Qualified Management Implement Internal Audit Program Implement CMS Correct Consumer Violations Est. Compliance Committee

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UDAAP, FCRA, TILA	Cottonwood Financial, Ltd., d/b/a Cash Store, Irving, Texas	<ul style="list-style-type: none"> • Deceptive representations in its television advertisements and telemarketing calls when promoting “50%-off” all of its loan fees when it did not • Unfair practices by repeatedly calling consumers’ workplaces and references after, disclosing the delinquency, and making excessive calls • FCRA by failing to maintain adequate policies and procedures concerning the accuracy and integrity of the information it furnished to consumer reporting agencies • Violated TILA by failing to provide the annual percentage rate to consumers when they inquired over the phone about the cost of their loans. 	Consent Order	CFPB	4/1/20	Redress: \$286,675.64 CMP: \$1,100,000 Prohibited from certain collection practices and required to ensure that its employees respond accurately when asked about its loans’ fees.
Flood	Bank of Clarke County Berryville, VA	<ul style="list-style-type: none"> • Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25. 	CMP	FRB	3/15/20	CMP: \$5,500
Flood	Amboy Bank, Old Bridge, NJ	<ul style="list-style-type: none"> • Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25. 	CMP	FRB	3/14/20	CMP: \$28,000

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UDAAP	Fifth Third Bank, NA	Bureau alleges that for several years Fifth Third, without consumers' knowledge or consent: opened deposit and credit card accounts in consumers' names; transferred funds from consumers' existing accounts to new, improperly opened accounts; enrolled consumers in unauthorized online-banking services; and activated unauthorized lines of credit on consumers' accounts.	Complaint	CFPB	3/9/20	Bureau seeks an injunction to stop Fifth Third's unlawful conduct, redress for affected consumers, and the imposition of a civil money penalty.
Unlawful Conduct: <ul style="list-style-type: none"> • Fraud • Identity Theft • False records 	Wells Fargo, Sioux Falls, SD	Per the DOJ: <ul style="list-style-type: none"> • Wells Fargo engaged in practices between 2002 and 2016 of pressuring employees to meet unrealistic sales goals that led thousands of employees to provide millions of accounts or products to customers under false pretenses or without consent, often by creating false records or misusing customers' identities; • Wells Fargo admitted that it collected millions of dollars in fees and interest to which the Company was not entitled, harmed the credit ratings of certain customers, and unlawfully misused customers' sensitive personal information, including customers' means of identification. 	Settlement	DOJ/SEC	2/21/20	Monetary Penalty: \$3 billion

ISSUE	INSTITUTION	VIOLATIONS/FINDINGS	ACTION	AGENCY	DATE	PENALTY/ CORRECTIVE ACTION
UDAAP	Candy Kern-Fuller, Howard Sutter III, and Upstate Law Group LLC	Bureau alleges that the defendants worked with a series of companies that brokered contracts offering high-interest credit to consumers, primarily disabled veterans, and violated the Consumer Financial Protection Act's prohibition against deceptive acts or practices and against providing substantial assistance to deceptive and unfair acts or practices of others.	Complaint	CFPB, South Carolina Department of Consumer Affairs, and Arkansas Attorney General	2/20/20	The complaint seeks an injunction, redress to consumers, and the imposition of civil money penalties.
Flood	Farmers and Merchants Bank, New Castle, VA	Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25	CMP	FRB	02/04/20	CMP: \$9,500
TILA/Regulation Z	Citizens Bank, N.A., Providence, RI	CFPB alleges Citizens Bank: <ul style="list-style-type: none"> • Systematically violated TILA and Regulation Z by failing to properly manage and respond to consumers' credit card disputes and fraud claims. • Violated TILA and Regulation Z by not providing credit counseling to consumers as required by law. 	Civil Action Complaint Filed	CFPB	01/30/20	Pending Litigation CFPB seeks, among other remedies, an injunction against Citizens and the imposition of civil money penalties.
Flood	Alden State Bank, Alden, NY	Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25.	CMP	FRB	01/24/20	CMP: \$36,500

ISSUE	INSTITUTION	VIOLATIONS/FINDINGS	ACTION	AGENCY	DATE	PENALTY/ CORRECTIVE ACTION
TILA/ UDAP	Wells Fargo Executives, Sioux Falls, SD	Sales practices misconduct resulted in violations of consumer laws and regulations, including but not limited to: <ul style="list-style-type: none"> • Unfair and Deceptive Acts and Practices; • Regulation DD/Truth in Savings; and • Regulation Z/Truth in Lending 	Notice of Charges Personal Orders of Prohibition Personal Orders to Cease and Desist CMP	OCC	01/23/20	Request for Relief: <ul style="list-style-type: none"> • Personal Orders of Prohibition, • Personal Orders to Cease and Desist • CMP <ul style="list-style-type: none"> ○ \$500,000 – 25 mill. Settlements: <ul style="list-style-type: none"> • Prohibition order and a \$17,500,000 CMP against former bank Chairman and CEO; • Personal cease and desist order and a \$2,250,000 CMP against the bank’s former Chief Administrative Officer and Director of Corporate Human Resources; and • Personal cease and desist order and assessment of a \$1,250,000 CMP against its former Chief Risk Officer for their roles in the bank’s sales practices misconduct.

ISSUE	INSTITUTION	VIOLATIONS/FINDINGS	ACTION	AGENCY	DATE	PENALTY/ CORRECTIVE ACTION
Flood	Citibank, N.A. Sioux Falls, SD	<ul style="list-style-type: none"> Allowed its third-party servicer to extend the 45-day period after notification to the borrower resulting in the untimely force placement of flood insurance on Designated Loans. <p>Since at least 2014, failed to force place insurance in a timely manner on residential Designated Loans.</p>	CMP	OCC	01/17/20	CMP:\$ 17,998,510
FCRA/UDAAP	Monster Loans, Lend Tech Loans, and Associated Student Loan Debt- Relief Companies	<p>CFPB alleges:</p> <ul style="list-style-type: none"> Many of the Defendants violated the FCRA by wrongfully obtaining consumer report information; In the marketing and sale of student loan debt relief products and services, certain Defendants charged unlawful advance fees and engaged in deceptive acts and practices. Certain entities and individuals are liable as Relief Defendants because they received profits resulting from the illegal conduct. 	Civil Action Complaint Filed	CFPB	01/09/20	<p>Pending Litigation</p> <p>CFPB seeks an injunction against defendants, as well as damages, redress to consumers, disgorgement of ill-gotten gains, and the imposition of civil money penalties.</p>

*2020 (through December 31, 2020) LENDING COMPLIANCE RELATED ENFORCEMENT ACTIONS
(NUMBER BY PENALTY TYPE AND REGULATOR)

LAW/REGULATION	FDIC	FRB	OCC	CFPB	HUD	DOJ	NCUA	TOTAL
FAIR LENDING	(1**HMDA)	-	-	2	-	-	-	2
FLOOD	3 (1**)	9	3	-	-	-	-	15
MILITARY LENDING	-	-	-	2	-	-	-	2
TILA/RESPA	1	-	1	3 (1**)	-	-	-	5
UDAP/UDAAP	-	-	(1**)	24 (1**)	-	-	-	24
OTHER	(1**Reg O, Appraisal)	-	1(Appraisal)	5 (FCRA) 2 TSR (1**TSR)	-	-	-	8
TOTAL	4	9	5	38	-	-	-	56

Lending compliance enforcement actions against financial institutions and other companies (non-individuals) that might have an impact on financial institutions. Chart is intended to be an educational tool. Not guaranteed to be comprehensive.

**The violation of this law/regulation was part of an enforcement action that contained violations of multiple laws/regulations. The violation of this particular law is notated in the chart, but is not counted as a separate enforcement action and, as a result, is not counted in the *Totals* of this chart in order to avoid duplicative results.