

# As The Supreme Court Is Set To Hear Oral Arguments On The Constitutionality Of The CFPB, Industry And Right-Wing Groups Have Contributed Over \$7.7 Million To The Republican Attorneys General Association In An Effort To Undermine Consumer Protections.

**Summary:** In fall 2023, the Supreme Court is [set to hear oral arguments](#) on the constitutionality of the Consumer Financial Protection Bureau's (CFPB) funding structure. Originally brought to the courts in [April 2018](#), the Community Financial Services Association of America (CFSA) has challenged the bureau's 2017 payday rule, and had [unsuccessful attempts](#) to invalidate this rule until the Fifth Circuit Court of Appeals ruled in favor of the group, saying the CFPB's funding structure was unconstitutional.

In August 2023, the Supreme Court [denied a petition from the Republican Attorneys General Association](#) (RAGA) seeking to argue in support of the CFSA's lawsuit against the Bureau. Over two dozen state attorneys general (AGs) signed the petition.

With the court set to take up oral arguments, a review by Accountable.US shows Republican AGs have **received a staggering \$7.7 million** from anti-CFPB industry and conservative groups since April 2018. This shows a storied history of Republican AGs receiving money from industry and conservative groups opposed to the important rulemaking from the Bureau to protect consumers from predatory lenders. Several of these entities also filed amicus briefs in July 2023 in support of the CFSA's suit against the CFPB, including right-wing groups such as the Foundation for Government Accountability and Americans For Prosperity.

Industries that are regulated and opposed to CFPB rulemaking have contributed a **combined \$3.2 million**, which include:

- **Payday and high-cost lenders contributed over \$1.3 million** to RAGA since the CFSA's original April 2018 lawsuit.
- **Large banks**, including several that have [paid billions in fines](#) for predatory behavior, contributed **over \$900,000** to RAGA since April 2018.
- **Midland Credit Management**, whose parent company [paid over \\$15 million in fines and restitution](#) for violating a 2015 consent order, gave Republican AGs **\$80,000** since the CFSA filed its original April 2018 lawsuit.
- **The National Automobile Dealers Association and Credit Acceptance Corporation** contributed a combined **\$250,280** to RAGA since April 2018.
- The for-profit college **University of Phoenix** and college loan servicer **Navient Solutions** contributed a combined **\$340,925** to RAGA since April 2018.
- Credit card giants **MasterCard and Visa** contributed a combined **\$277,450** to RAGA since April 2018.

In addition to industry regulated by the CFPB, groups that filed amicus briefs supporting the CFSA's lawsuit contributed a combined **\$4.5 million** to the Republican Attorneys General Association. These include:

- **The U.S. Chamber of Commerce**, which [led an industry-wide July 2023 amicus brief](#), contributed a staggering **\$4.4 million** to RAGA since the CFSA's original April 2018 suit.

- **ACA International**, a [trade group](#) representing collection agencies, [filed a July 2023 amicus brief](#) and contributed **\$77,635** to Republican AGs seeking to join oral arguments against the CFPB.
- **The National Federation of Independent Business**, which represents small businesses and [filed a July 2023 amicus brief](#), contributed **\$15,000** to RAGA since the CFSA's original April 2018 lawsuit.
- The conservative group **Foundation for Government Accountability**, which [touts](#) working with far-right politicians such as [Rep. Andy Biggs](#) (R-AZ), [filed an amicus brief](#) in support of the CFSA and contributed **\$1,775** to RAGA since April 2018.
- **Americans For Prosperity**, which is backed by "[ultrawealthy conservatives](#)," filed a [July 2023 amicus brief](#) supporting the CFSA and contributed **\$5,400** to RAGA since April 2018.
- Finally, the **American Financial Services Association**, an [industry group representing the credit industry](#), filed a [July 2023 amicus brief](#) and contributed **\$15,775** to RAGA since the CFSA's April 2018 lawsuit against the CFPB.

## **The Supreme Court Is Set To Hear Arguments On The Constitutionality Of The CFPB's Funding This Fall After A Lawsuit From The Community Financial Services Association Of America (CFSA), A Payday Industry Group, Sought To Invalidate The CFPB's 2017 Payday Rule.**

### **In April 2018, The Community Financial Services Association Of America Unsuccessfully Sued The CFPB In The Western District Of Texas To Invalidate Its Final Payday Rule While Arguing Against The Constitutionality Of Its Funding And Leadership Structure—The Western District's Decision Was Subsequently Appealed By The Trade Group.**

**April 2018: The Community Financial Services Association Of America, Alongside The Consumer Service Alliance Of Texas, Filed A Lawsuit In The Western District Of Texas Seeking To Invalidate The CFPB's Final Payday Rule While Also Arguing The CFPB's Leadership Structure At The Time Was Unconstitutional Due To A Single Director "Improperly Insulated From Both Presidential Supervision And Congressional Appropriation."** "The Community Financial Services Association of America (CFSA) and the Consumer Service Alliance of Texas today filed a lawsuit in the U.S. District Court for the Western District of Texas, Austin Division, against the Consumer Financial Protection Bureau (CFPB or Bureau) seeking to invalidate the Bureau's final rule on 'Payday, Vehicle Title, and Certain High-Cost Installment Loans.' The lawsuit alleges that the rule violates the Administrative Procedure Act (APA) because it exceeds the Bureau's statutory authority and is arbitrary, capricious, and unsupported by substantial evidence. The lawsuit also argues that the CFPB's structure is unconstitutional under the Constitution's separation of powers because the agency's powers are concentrated in a single, unchecked Director who is improperly insulated from both presidential supervision and congressional appropriation, and hence unaccountable to the American people." [CFSA, [04/09/18](#)]

**The Western District Of Texas "Rejected The Trade Associations' Numerous Arguments For Invalidating The Rule," With The Ruling Appealed By The Groups.** "Specifically, two trade associations brought suit in the Western District of Texas to challenge the validity of the CFPB's 2017 Payday Lending Rule. The federal district court rejected the trade associations' numerous arguments for invalidating the rule, and the plaintiffs appealed." [Brownstein, [10/25/22](#)]

**The Western District Of Texas “Reject[ed] All Of The Trade Groups’ Claims,” Including Those Seeking To Invalidate The Rule Due To The Unconstitutionality Of Its Funding Structure And Leadership Structure.** “The district court granted summary judgment for the CFPB, rejecting all of the trade groups’ claims, including their arguments that the Consumer Financial Protection Act’s restriction on the CFPB Director’s removal (which the U.S. Supreme Court ruled was unconstitutional in *Seila Law*) rendered the Rule void ab initio and that the Rule was invalid because the CFPB’s funding mechanism violates the Appropriations Clause.” [Ballard Spahr, [10/20/22](#)]

- **June 2020: The CFPB’s Leadership Structure Was Ultimately Ruled Unconstitutional By The Supreme Court, With The Court Ruling The Director Could Be Fired Without Cause By The President.** “The Supreme Court ruled on Monday that the president is free to fire the director of the Consumer Financial Protection Bureau without cause. The decision, rejecting a federal law that sought to place limits on presidential oversight of independent agencies, was a victory for the conservative movement to curb the administrative state. The ruling puts to rest a decade of doubt over whether the bureau and its leadership structure, in which the director is appointed by the president to a five-year term and cannot be dismissed without a substantial reason, were constitutional.” [New York Times, [06/29/20](#)]

### **In October 2022, A Three-Judge Panel Of The Fifth Circuit Court Of Appeals Ruled That The Consumer Financial Protection Bureau’s (CFPB) Funding Structure Was Unconstitutional, Overruling The District Decision.**

**October 19, 2022: A Three-Judge Panel Of The Fifth Circuit Court Of Appeals Ruled That The Consumer Financial Protection Bureau’s Funding Structure Was Unconstitutional, Overruling The District Decision.** “A federal appeals court has ruled that the funding structure of the nation’s most powerful financial watchdog agency, the Consumer Financial Protection Bureau, is unconstitutional. In a case brought by a payday lending group, a three-judge panel of the 5th U.S. Circuit Court of Appeals threw out a CFPB regulation governing those high-interest-rate lenders and ruled that the way the bureau is funded, ‘violates the Constitution’s structural separation of powers.’” [NPR, [10/19/22](#)]

### **In February 2023, The Supreme Court Agreed To Take Up The Case On The CFPB’s Constitutionality.**

**February 27, 2023: The Supreme Court Agreed To Take Up The Case Regarding The Constitutionality Of The CFPB’s Funding Structure After A “Panel Of Three Trump Appointees On The Fifth Circuit Court Of Appeals Ruled [In October 2022] That The Agency’s Funding Is Unconstitutional.”** “The Supreme Court agreed on Monday to take up a case that could threaten the existence of the Consumer Financial Protection Bureau and potentially the status of numerous other federal agencies, including the Federal Reserve. A panel of three Trump appointees on the Fifth Circuit Court of Appeals ruled last fall that the agency’s funding is unconstitutional because the CFPB gets its money from the Federal Reserve, which in turn is funded by bank fees.” [NPR, [02/27/23](#)]

**In August 2023, The Supreme Court Denied A Petition From A Group Of Republican Attorneys General Seeking To Argue Against The CFPB’s Funding In The Upcoming Consumer Financial Protection Bureau v. Community Financial Services Association Case.**

**In August 2023, The Supreme Court Denied A Petition From A Group of 27 Republican Attorneys General Seeking To Offer Oral Arguments Against The CFPB’s Funding In The Upcoming Consumer Financial Protection Bureau v. Community Financial Services Association Case.**

In July 2023, Republican Attorneys General From West Virginia And 26 Other States Filed A Petition Seeking To Offer Oral Arguments Against The CFPB’s Funding In The Upcoming Consumer Financial Protection Bureau v. Community Financial Services Association Case. “West Virginia Attorney General Patrick Morrisey (R) and the other GOP states filed a petition in July seeking to divide the oral arguments in the Consumer Financial Protection Bureau v. Community Financial Services Association case. In their petition, the states’ attorneys general argued their expertise in consumer protection issues gives them ‘special understanding of how an unbounded CFPB can damage the consumer-financial markets—and impair the States’ own abilities to regulate those markets.’” [Bloomberg Law, [08/21/23](#)]

- “The Republican Attorneys General For Alabama, Alaska, Arkansas, Florida, Georgia, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, New Hampshire, North Dakota, Ohio, Oklahoma, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, And Wyoming Signed On To Morrisey’s Petition.” [Bloomberg Law, [08/21/23](#)]

In August 2023, The Supreme Court Denied This Petition With No Explanation. “The US Supreme Court denied a request from West Virginia and 26 other Republican attorneys general to make their own challenge to the CFPB’s funding mechanism at oral arguments this fall. [...] But the Supreme Court on Monday denied the motion to intervene in an unsigned order with no explanation. The high court rarely grants such motions.” [Bloomberg Law, [08/21/23](#)]

**Industries Regulated By The CFPB Have Flooded The Republican Attorneys General Association With Over \$3.2 Million In Contributions Since The CFSA Filed Its April 2018 Lawsuit Against The CFPB.**

**Payday And Other High-Cost Lenders Have Contributed Nearly \$1.4 Million To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018.**

Payday And Other High-Cost Lenders Have Contributed \$1,392,345 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
Ace Cash Express, Inc	02/25/20	\$125,000	<a href="#">Link</a>
Ace Cash Express, Inc.	08/29/19	\$100	<a href="#">Link</a>
Ace Cash Express, Inc.	01/24/19	\$125,000	<a href="#">Link</a>
Advance America	08/12/20	\$5,000	<a href="#">Link</a>
Advance America	09/09/19	\$50,000	<a href="#">Link</a>
Advance America	06/10/19	\$5,000	<a href="#">Link</a>

Advance America	09/18/18	\$75,000	<a href="#">Link</a>
Advance Financial 24/7	05/17/18	\$500	<a href="#">Link</a>
Advance Financial Administration LLC	05/23/22	\$25,000	<a href="#">Link</a>
American Financial Service Association	10/22/19	\$425	<a href="#">Link</a>
American Financial Service Association	07/12/19	\$375	<a href="#">Link</a>
American Financial Service Association	05/22/19	\$350	<a href="#">Link</a>
American Financial Service Association	03/14/19	\$15,000	<a href="#">Link</a>
Bluechip Financial LLC	04/13/22	\$25,000	<a href="#">Link</a>
Bluechip Financial LLC	08/11/21	\$15,000	<a href="#">Link</a>
Bluechip Financial LLC	10/02/19	\$15,000	<a href="#">Link</a>
Check Into Cash, Inc.	06/11/18	\$10,000	<a href="#">Link</a>
Community Choice Financial	02/21/23	\$31,250	<a href="#">Link</a>
Community Choice Financial	09/22/22	\$31,250	<a href="#">Link</a>
Community Choice Financial	08/23/22	\$315	<a href="#">Link</a>
Community Choice Financial	08/11/22	\$250	<a href="#">Link</a>
Community Choice Financial	07/21/22	\$5,000	<a href="#">Link</a>
Community Choice Financial	07/08/22	\$310	<a href="#">Link</a>
Community Choice Financial	07/07/22	\$375	<a href="#">Link</a>
Community Choice Financial	03/31/22	\$31,250	<a href="#">Link</a>
Community Choice Financial	12/20/21	\$620	<a href="#">Link</a>
Community Choice Financial	12/13/21	\$285	<a href="#">Link</a>
Community Choice Financial	10/20/21	\$31,250	<a href="#">Link</a>
Community Choice Financial	09/17/21	\$285	<a href="#">Link</a>
Community Choice Financial	07/13/21	\$5,000	<a href="#">Link</a>
Community Choice Financial	04/30/21	\$31,250	<a href="#">Link</a>
Community Choice Financial	09/17/20	\$31,250	<a href="#">Link</a>
Community Choice Financial	04/14/20	\$31,250	<a href="#">Link</a>
Community Choice Financial	10/15/19	\$5,000	<a href="#">Link</a>
Community Choice Financial	06/12/19	\$900	<a href="#">Link</a>
Community Choice Financial	06/08/19	\$50,000	<a href="#">Link</a>
Community Choice Financial	10/04/18	\$255	<a href="#">Link</a>
Community Choice Financial	06/22/18	\$50,000	<a href="#">Link</a>
Community Choice Financial	04/18/18	\$5,000	<a href="#">Link</a>
Elevate Credit Service LLC	03/29/22	\$50,000	<a href="#">Link</a>
Elevate Credit Service LLC	03/08/21	\$50,000	<a href="#">Link</a>
Elevate Credit Service LLC	04/14/20	\$50,000	<a href="#">Link</a>
Elevate Credit Service LLC	04/16/19	\$15,000	<a href="#">Link</a>
Enova	06/05/19	\$1,250	<a href="#">Link</a>
Financial Service Centers of America	12/16/20	\$30,000	<a href="#">Link</a>
Financial Service Centers of America	06/25/19	\$30,000	<a href="#">Link</a>
Financial Service Centers of America	11/01/18	\$30,000	<a href="#">Link</a>
Financial Service Centers of America/ INFiN	07/29/21	\$31,250	<a href="#">Link</a>
InFIN	09/27/22	\$40,000	<a href="#">Link</a>
Mariner Finance LLC	11/03/22	\$100	<a href="#">Link</a>
Mariner Finance LLC	07/05/22	\$510	<a href="#">Link</a>
Mariner Finance LLC	03/07/22	\$50,000	<a href="#">Link</a>
Purpose Financial	06/20/23	\$25,000	<a href="#">Link</a>
Purpose Financial	07/06/22	\$25,000	<a href="#">Link</a>
Purpose Financial	10/21/21	\$400	<a href="#">Link</a>
Purpose Financial	10/12/21	\$5,000	<a href="#">Link</a>
Purpose Financial	10/13/20	\$400	<a href="#">Link</a>

TitleMax	06/23/22	\$25,000	<a href="#">Link</a>
TitleMax	11/01/21	\$80	<a href="#">Link</a>
TitleMax	09/07/21	\$400	<a href="#">Link</a>
TitleMax	04/30/21	\$25,000	<a href="#">Link</a>
TitleMax	01/22/20	\$25,000	<a href="#">Link</a>
TitleMax	02/11/19	\$25,000	<a href="#">Link</a>
TitleMax	09/28/18	\$10,000	<a href="#">Link</a>
TitleMax	06/20/18	\$12,500	<a href="#">Link</a>
TMX Finance Family of Companies	10/21/20	\$265	<a href="#">Link</a>
TMX Finance Family of Companies	08/13/20	\$315	<a href="#">Link</a>
TMX Finance Family of Companies	10/01/19	\$125	<a href="#">Link</a>
TMX Finance Family of Companies	09/30/19	\$300	<a href="#">Link</a>
TMX Finance Family of Companies	09/24/18	\$155	<a href="#">Link</a>
TMX Finance Family of Companies	04/30/18	\$100	<a href="#">Link</a>
TMX Finance Family of Companies	04/20/18	\$100	<a href="#">Link</a>
		<b>Total: \$1,392,345</b>	

**Banks, Including Several That Have Paid Billions In Fines From CFPB Enforcement Actions, Have Contributed Over \$900,000 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018.**

**July 2023: The CFPB Ordered Bank Of America To Pay “A Total Of \$90 Million In Penalties” After It Was Found To Have “Systematically” Double-Dipped On Nonsufficient Funds, While Also Withholding Credit Card Reward Bonuses And “Misappropriating Sensitive Personal Information To Open Accounts Without Customer Knowledge Or Authorization.”** “Today, the Consumer Financial Protection Bureau (CFPB) ordered Bank of America to pay more than \$100 million to customers for systematically double-dipping on fees imposed on customers with insufficient funds in their account, withholding reward bonuses explicitly promised to credit card customers, and misappropriating sensitive personal information to open accounts without customer knowledge or authorization. The Office of the Comptroller of the Currency (OCC) also found that the bank’s double-dipping on fees was illegal. Bank of America will pay a total of \$90 million in penalties to the CFPB and \$60 million in penalties to the OCC.” [CFPB, [07/11/23](#)]

**December 2022: The CFPB Ordered Wells Fargo To Pay \$3.7 Billion In Fines And Restitution To Settle Allegations It “Mismanaged Auto Loans, Mortgages And Deposit Accounts.”** “Wells Fargo will pay \$3.7 billion to settle allegations by the Consumer Financial Protection Bureau that it mismanaged auto loans, mortgages and deposit accounts, in the largest penalty ever levied by the agency. The consent order announced by the CFPB on Tuesday is the latest in a string of woes for the scandal-plagued megabank, which in recent years has shelled out billions of dollars in fines and found itself in the crosshairs of Congress after being accused of opening up millions of fake customer accounts and other violations.” [Politico, [12/20/22](#)]

**August 2017: The CFPB Ordered JPMorgan To Pay A \$4.6 Million Fine For “Failures Related To Information It Provides For Checking Account Screening Reports.”** “The Consumer Financial Protection Bureau (CFPB) today took action against JPMorgan Chase Bank, N.A. for failures related to information it provides for checking account screening reports. Banks screen potential customers based on reports about prior checking account behavior created by consumer reporting companies. Banks that supply information for those reports are legally required to have proper processes in place for reporting accurate information. Chase did not have these processes in place and kept consumers in the dark about the results of their reporting disputes and key aspects of their checking account application denials. The Bureau is ordering Chase to pay a \$4.6 million penalty and implement necessary changes to its policies to prevent future legal violations.” [CFPB, [08/02/17](#)]

**Banks Have Contributed \$903,195 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
Bank of America Corporation	10/13/22	\$25,000	<a href="#">Link</a>
Bank of America Corporation	07/14/20	\$25,000	<a href="#">Link</a>
Bank of America Corporation	05/28/19	\$25,000	<a href="#">Link</a>
Bank of America Corporation	06/08/18	\$25,000	<a href="#">Link</a>
Capital One Services, LLC	07/28/22	\$50,000	<a href="#">Link</a>
Capital One Services, LLC	12/18/19	\$25,000	<a href="#">Link</a>
Capital One Services, LLC	11/26/19	\$50,000	<a href="#">Link</a>
Capital One Services, LLC	06/11/19	\$900	<a href="#">Link</a>
Capital One Services, LLC	01/14/19	\$50,000	<a href="#">Link</a>
Citigroup Management Corp	12/17/21	\$75,000	<a href="#">Link</a>
Citigroup Management Corp	10/19/20	\$75,000	<a href="#">Link</a>
Citigroup Management Corp	10/23/19	\$75,000	<a href="#">Link</a>
Citigroup Management Corp	11/07/18	\$75,000	<a href="#">Link</a>
Citigroup Management Corp	06/14/18	\$500	<a href="#">Link</a>
Citigroup Management Corp	06/14/18	\$250	<a href="#">Link</a>
Citigroup Management Corp.	03/22/23	\$50,000	<a href="#">Link</a>
Cross River Bank	03/20/20	\$25,000	<a href="#">Link</a>
Cross River Bank	07/16/19	\$20,000	<a href="#">Link</a>
JPMorgan Chase And Co. Pac	03/30/23	\$25,500	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	03/21/22	\$25,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	10/28/20	\$10,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	08/24/20	\$10,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	02/24/20	\$5,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	10/03/19	\$5,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	08/26/19	\$5,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	08/08/19	\$5,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	05/23/19	\$5,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	04/01/19	\$5,500	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	02/13/19	\$5,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	05/14/18	\$5,000	<a href="#">Link</a>
JPMorgan Chase and Co. PAC	04/23/18	\$5,000	<a href="#">Link</a>
Regions Bank	02/07/23	\$60	<a href="#">Link</a>
Regions Bank	01/30/23	\$15,000	<a href="#">Link</a>
Wells Fargo and Company	07/26/22	\$25,000	<a href="#">Link</a>
Wells Fargo and Company	01/08/22	\$285	<a href="#">Link</a>
Wells Fargo and Company	11/01/21	\$25,000	<a href="#">Link</a>
Wells Fargo and Company	06/29/20	\$25,000	<a href="#">Link</a>
Wells Fargo and Company	05/13/19	\$25,000	<a href="#">Link</a>
Wells Fargo and Company	11/16/22	\$200	<a href="#">Link</a>
<b>Total: \$903,195</b>			

**Midland Credit Management, Whose Parent Company Was Ordered By The CFPB To Pay Over \$15 Million In Fines And Restitution In October 2020 For Violating A 2015 Consent Order, Has Contributed \$80,000 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018.**

**October 2020: The CFPB Ordered Encore Capital Group, The Parent Company Of Midland Credit Management, To Pay “\$79,308.81 In Redress To Consumers And A \$15 Million Civil Money Penalty” After It Was Found To Have Violated A 2015 Consent Order Filed Against It For Violating The “Consumer Financial Protection Act (CFPA), Fair Debt Collection Practices Act (FDCPA), And Fair Credit Reporting Act.”** “Today the Consumer Financial Protection Bureau (Bureau) filed a proposed stipulated final judgment and order to settle its lawsuit against Encore Capital Group, Inc., and its subsidiaries, Midland Funding, LLC; Midland Credit Management, Inc.; and Asset Acceptance Capital Corp. The companies, which are headquartered in San Diego, California, together comprise the largest debt collector and debt buyer in the United States. 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 Fair Credit Reporting Act. The Bureau sued Encore and its subsidiaries on September 8 of this year, alleging that Encore and its subsidiaries violated the terms of this consent order and again violated the FDCPA and CFPA in their debt-collection practices. If entered by the court, the settlement will require Encore and its subsidiaries to pay consumer redress and a civil money penalty. [...] If entered by the court, the stipulated final judgment and order will require Encore and its subsidiaries to pay \$79,308.81 in redress to consumers and a \$15 million civil money penalty.” [CFPB, [10/15/20](#)]

**Midland Credit Management Has Contributed \$80,000 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
Midland Credit Management, Inc.	10/28/21	\$15,000	<a href="#">Link</a>
Midland Credit Management, Inc.	11/14/19	\$15,000	<a href="#">Link</a>
Midland Credit Management, Inc.	10/15/18	\$50,000	<a href="#">Link</a>
<b>Total: \$80,000</b>			

**The National Automobile Dealers Association And Credit Acceptance Corporation, A Predatory Auto Lender Sued By the CFPB In January 2023, Have Contributed \$250,280 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018.**

**January 2023: The CFPB, Alongside The New York Attorney General’s Office, Sued Credit Acceptance Corporation For “Misrepresenting The Cost Of Credit And Tricking Its Customers Into High-Cost Loans On Used Cars.”** “Today, the Consumer Financial Protection Bureau (CFPB) and the New York State Office of the Attorney General sued a predatory auto lender, Credit Acceptance Corporation, for misrepresenting the cost of credit and tricking its customers into high-cost loans on used cars. The car-buying experience turns into a nightmare for many of Credit Acceptance’s borrowers, who face unaffordable monthly payments, vehicle repossessions, and debt collection lawsuits. The joint complaint alleges that, among other things, Credit Acceptance hides costs in loan agreements and sets consumers up to fail. The complaint also alleges that Credit Acceptance violated New York usury limits and other consumer and investor protection laws. The lawsuit seeks to force Credit Acceptance to stop its illegal practices, reimburse harmed consumers, pay back wrongfully earned gains, and pay a penalty.” [CFPB, [01/04/23](#)]

**The National Automobile Dealers Association And Credit Acceptance Corporation Have Contributed \$250,280 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
Credit Acceptance Corporation	03/13/23	\$280	<a href="#">Link</a>
Credit Acceptance Corporation	01/25/23	\$75,000	<a href="#">Link</a>
Credit Acceptance Corporation	11/02/22	\$50,000	<a href="#">Link</a>

Credit Acceptance Corporation	12/14/21	\$50,000	<a href="#">Link</a>
National Automobile Dealers Association	04/18/23	\$25,000	<a href="#">Link</a>
National Automobile Dealers Association	01/16/20	\$25,000	<a href="#">Link</a>
National Automobile Dealers Association	01/17/19	\$25,000	<a href="#">Link</a>
<b>Total: \$250,280</b>			

**The University of Phoenix And Navient Solutions Have Contributed \$340,925 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018.**

The University of Phoenix, A For-Profit College, And Navient Solutions, A Subsidiary Of Navient, Have Contributed \$340,925 To the Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
Navient Solutions, LLC	11/15/22	\$25,000	<a href="#">Link</a>
Navient Solutions, LLC	11/07/22	\$450	<a href="#">Link</a>
Navient Solutions, LLC	07/08/22	\$500	<a href="#">Link</a>
Navient Solutions, LLC	01/31/22	\$15,000	<a href="#">Link</a>
Navient Solutions, LLC	12/13/21	\$400	<a href="#">Link</a>
Navient Solutions, LLC	12/13/21	\$400	<a href="#">Link</a>
Navient Solutions, LLC	11/01/21	\$15,000	<a href="#">Link</a>
Navient Solutions, LLC	09/08/21	\$200	<a href="#">Link</a>
Navient Solutions, LLC	09/07/21	\$400	<a href="#">Link</a>
Navient Solutions, LLC	09/02/21	\$400	<a href="#">Link</a>
Navient Solutions, LLC	02/11/20	\$350	<a href="#">Link</a>
Navient Solutions, LLC	01/22/20	\$15,000	<a href="#">Link</a>
Navient Solutions, LLC	09/30/19	\$425	<a href="#">Link</a>
Navient Solutions, LLC	06/19/19	\$375	<a href="#">Link</a>
Navient Solutions, LLC	02/22/19	\$350	<a href="#">Link</a>
Navient Solutions, LLC	01/28/19	\$15,000	<a href="#">Link</a>
Navient Solutions, LLC	10/01/18	\$525	<a href="#">Link</a>
Navient Solutions, LLC	05/17/18	\$375	<a href="#">Link</a>
Navient Solutions, LLC	05/17/18	\$375	<a href="#">Link</a>
University of Phoenix	10/14/22	\$50,000	<a href="#">Link</a>
University of Phoenix	10/15/21	\$50,000	<a href="#">Link</a>
University of Phoenix	10/08/21	\$400	<a href="#">Link</a>
University of Phoenix	09/18/20	\$50,000	<a href="#">Link</a>
University of Phoenix	09/06/19	\$50,000	<a href="#">Link</a>
University of Phoenix	09/13/18	\$50,000	<a href="#">Link</a>
<b>Total: \$340,925</b>			

- **Navient Solutions Is A Subsidiary Of Student Loan Servicer, Navient.** [[Navient Form 10-K, 02/24/23](#)]

**MasterCard And Visa Have Contributed \$277,450 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018.**

**MasterCard And Visa Have Contributed \$277,450 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
MasterCard International, Inc.	03/29/23	\$25,000	<a href="#">Link</a>
MasterCard International, Inc.	09/14/21	\$620	<a href="#">Link</a>
MasterCard International, Inc.	03/24/21	\$25,000	<a href="#">Link</a>
MasterCard International, Inc.	02/20/20	\$25,000	<a href="#">Link</a>
MasterCard International, Inc.	05/17/19	\$900	<a href="#">Link</a>
MasterCard International, Inc.	05/16/19	\$10,000	<a href="#">Link</a>
MasterCard International, Inc.	01/23/19	\$25,000	<a href="#">Link</a>
MasterCard International, Inc.	09/13/18	\$255	<a href="#">Link</a>
MasterCard International, Inc.	07/16/18	\$5,000	<a href="#">Link</a>
Visa	09/08/22	\$50,000	<a href="#">Link</a>
Visa	08/02/22	\$200	<a href="#">Link</a>
Visa	05/20/20	\$50,000	<a href="#">Link</a>
Visa	06/12/19	\$100	<a href="#">Link</a>
Visa	05/23/19	\$375	<a href="#">Link</a>
Visa	02/28/19	\$50,000	<a href="#">Link</a>
Visa	08/20/18	\$10,000	<a href="#">Link</a>
		<b>Total: \$277,450</b>	

**Groups That Filed Amicus Briefs Supporting The CFSA's Suit Against The CFPB Have Given The Republican Attorneys General Association Over \$4.5 Million In Contributions Since April 2018.**

**The U.S Chamber Of Commerce, Which Led A July 2023 Amicus Brief In Support Of The CFSA's Challenge Against The CFPB, Has Contributed A Staggering \$4.4 Million In Contributions To The Republican Attorneys General Association Since The CFSA's Original April 2018 Lawsuit.**

**According To Its Website, The U.S. Chamber Institute For Legal Reform's Mission "Is To Champion A Fair Legal System That Promotes Economic Growth And Opportunity."** "The mission of the U.S. Chamber Institute for Legal Reform (ILR) is to champion a fair legal system that promotes economic growth and opportunity. An effective legal system is critical to helping customers and business owners." [U.S. Chamber Institute for Legal Reform, accessed [08/22/23](#)]

**Its Website Also Says The Institute Conducts Research And "Then Tirelessly Advocate" "Solutions With Congress, State Legislatures" And Other Policymakers.** "The Institute for Legal Reform shines a light on what is wrong in the legal system. We conduct cutting-edge research and advance pragmatic solutions. We then tirelessly advocate for those solutions with Congress, state legislatures, federal regulators, international policymakers and the courts to effect meaningful change." [U.S. Chamber Institute for Legal Reform, accessed [08/22/23](#)]

**The U.S. Chamber Of Commerce Filed Its Amicus Brief In Support Of The CFSA's Lawsuit On July 10, 2023.** [Supreme Court, [07/10/23](#)]

**The U.S. Chamber Of Commerce's Institute For Legal Reform Has Contributed \$4,421,405 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
U.S. Chamber Institute For Legal Reform	03/24/23	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	01/24/23	\$60	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	03/17/23	\$500	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	03/03/23	\$60	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	06/24/22	\$500,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	06/13/22	\$5,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	09/02/22	\$750,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	03/21/22	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	12/29/21	\$50,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	08/30/21	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	11/05/21	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	10/26/21	\$285	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	10/30/20	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	09/25/20	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	03/06/20	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	06/27/19	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	02/28/19	\$250,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	06/03/19	\$375	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	11/01/18	\$100,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	10/29/18	\$15,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	09/06/18	\$125	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	09/13/18	\$500,000	<a href="#">Link</a>
U.S. Chamber Institute For Legal Reform	06/28/18	\$250,000	<a href="#">Link</a>
		<b>TOTAL: \$4,421,405</b>	

**The National Federation Of Independent Business, Which Signed On To The Chamber's Amicus Brief, Has Contributed \$15,000 To The Republican Attorneys General Association Since The CFSA's Original April 2018 Lawsuit.**

**According To Its Website, The National Federation Of Independent Business (NFIB) "Stands For Small And Independent Businesses" By "Advocat[ing] In Every State In Washington, D.C, Giving Our Members A Voice In Public Policy Debates":**

**Exclusive Focus on Small Business:** NFIB stands for America's small and independent businesses. This sole focus distinguishes us from other business organizations in the country.

**State and Federal Advocacy:** NFIB advocates in every state and in Washington, D.C., giving our members a voice in public policy debates on the local, state, and national level.

**One Member, One Vote:** NFIB members define our work through their responses to our surveys. Each member has an equal say in the policy positions NFIB takes.

[National Federation Of Independent Business, accessed [08/22/23](#)]

**On July 10, 2023, NFIB Signed On To A U.S. Chamber Of Commerce-Led Amicus Brief Supporting The CFSA's Lawsuit Against The CFPB.** [Supreme Court, [07/10/23](#)]

**The National Federation Of Independent Business Has Contributed \$15,000 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
National Federation of Independent Business	01/27/22	\$15,000	<a href="#">Link</a>
<b>TOTAL: \$15,000</b>			

**The American Financial Services Association (AFSA), A Trade Group Representing The Credit Industry That Signed On To The Chamber's Amicus Brief, Has Contributed \$15,775 To The Republican Attorneys General Association Since The CFSA's Original April 2018 Lawsuit Against The CFPB.**

According To Its Website, The American Financial Services Association (AFSA) "Is The Primary Trade Association For The Consumer Credit Industry" And "Provides Policy Advice And Issues Management At The Federal And State Level." "Founded in 1916, the American Financial Services Association (AFSA) is the primary trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA provides the consumer credit industry and the consumers it services with a voice in Washington, D.C., where the association is headquartered, and access to the media and investment community. It also provides policy advice and issues management at both the federal and state level." [American Financial Services Association, accessed [08/22/23](#)]

On July 10, 2023, The AFSA Signed On To An Amicus Brief Led By The U.S. Chamber Of Commerce In Support Of The CFSA's Lawsuit Against The CFPB. [Supreme Court, [07/10/23](#)]

**The American Financial Services Association Has Contributed \$15,775 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
American Financial Services Association	10/22/19	\$425	<a href="#">Link</a>
American Financial Services Association	03/14/19	\$15,000	<a href="#">Link</a>
American Financial Services Association	05/22/19	\$350	<a href="#">Link</a>
<b>TOTAL: \$15,775</b>			

**ACA International, Which Filed A July 2023 Amicus Brief, Has Contributed \$77,635 To The Republican Attorneys General Association Since The CFSA's Original April 2018 Lawsuit.**

According To Its Website, ACA International "Brings Together Third-Party Collection Agencies, Law Firms, Asset Buying Companies, Creditors, And Vendor Affiliates." "Founded in 1939, ACA brings together third-party collection agencies, law firms, asset buying companies, creditors, and vendor affiliates, representing more than 230,000 industry employees. ACA establishes ethical standards, produces a wide variety of products, services, and publications, and articulates the value of the accounts receivable management industry to businesses, policymakers, and consumers." [ACA International, accessed [08/22/23](#)]

ACA International Filed An Amicus Brief In Support Of The CFSA's Lawsuit Challenging The Constitutionality Of The CFPB On July 10, 2023. [Supreme Court, [07/10/23](#)]

**ACA International Has Contributed \$77,635 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

Contributor	Date Of Contribution	Amount	Source
ACA International	02/07/23	\$60	<a href="#">Link</a>
ACA International	02/17/23	\$15,000	<a href="#">Link</a>
ACA International	02/28/23	\$400	<a href="#">Link</a>
ACA International	11/07/22	\$470	<a href="#">Link</a>
ACA International	03/15/22	\$15,000	<a href="#">Link</a>
ACA International	02/26/21	\$15,000	<a href="#">Link</a>
ACA International	02/10/20	\$15,000	<a href="#">Link</a>
ACA International	10/01/19	\$425	<a href="#">Link</a>
ACA International	02/04/19	\$15,000	<a href="#">Link</a>
ACA International	02/13/19	\$350	<a href="#">Link</a>
ACA International	10/09/18	\$555	<a href="#">Link</a>
ACA International	05/11/18	\$375	<a href="#">Link</a>
<b>TOTAL: \$77,635</b>			

**The Foundation For Government Accountability, Which Touts Working With Conservative Members Of Congress, Has Contributed \$1,775 To The Republican Attorneys General Association Since The Original April 2018 Lawsuit.**

**The Foundation For Government Accountability (FGA) Is A Conservative Research Organization Founded In 2011 By President And CEO Tarren Bragdon.** "The Foundation for Government Accountability (FGA) was founded in 2011 by President and CEO Tarren Bragdon. After focusing solely on reforms in Florida for the first year, Bragdon realized that the problems facing Floridians were the same problems facing Americans across the country." [Foundation for Government Accountability, accessed [08/22/23](#)]

- **Tarren Worked For The Maine Heritage Policy Center And Served As A Maine State House Member Prior To Founding FGA.** "Prior to joining FGA, Tarren served as the chief executive officer at the Maine Heritage Policy Center. He also served in the Maine House of Representatives, and remains the youngest person elected to the Maine Legislature, serving from 1996 to 2000. He holds a Bachelor of Science in Computer Science from the University of Maine and a Master of Science of Business from Husson University." [Foundation for Government Accountability, accessed [08/22/23](#)]

**On Its Website, FGA Touts Working With Conservative Members Of Congress Such As Rep. Andy Biggs (R-AZ) And Sen. Rick Scott (R-FL).** [Foundation For Government Accountability, accessed [08/22/23](#)]

**On July 10, 2023, The Foundation For Government Accountability Filed An Amicus Brief Supporting The CFSA's Lawsuit Against The CFPB.** [Supreme Court, [07/10/23](#)]

**The Foundation For Government Accountability Has Contributed \$1,775 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

Contributor	Date Of Contribution	Amount	Source
Foundation For Government Accountability	01/03/22	\$685	<a href="#">Link</a>
Foundation For Government Accountability	09/02/21	\$715	<a href="#">Link</a>
Foundation For Government Accountability	07/23/20	\$375	<a href="#">Link</a>
<b>TOTAL: \$1,775</b>			

**Americans For Prosperity—An Advocacy Group Backed By "Hundreds Of Ultrawealthy Conservatives"—Submitted An Amicus Brief In July 2023 Supporting The CFSA's Lawsuit And Has Contributed \$5,400 To The Republican Attorneys General Association Since April 2018.**

**Americans For Prosperity Is A Conservative Advocacy Group Backed By The Billionaire Koch Family And "Hundreds Of Ultrawealthy Conservatives," To Influence American Politics, Pouring Nearly \$500 Million Into The 2020 Election Cycle Alone.** "The donor network created by the billionaire industrialist brothers Charles G. and David H. Koch is preparing to get involved in the presidential primaries in 2024, with the aim of turning "the page on the past" in a thinly veiled rebuke of former President Donald J. Trump, according to an internal memo. [...] The network, comprising an array of political and advocacy groups that have been backed by hundreds of ultrawealthy conservatives, has been among the most influential forces in American politics over the past 15 years, spending nearly \$500 million supporting Republican candidates and conservative policies in the 2020 election cycle alone." [The New York Times, [02/05/23](#)]

**On July 07, 2023, Americans For Prosperity Filed An Amicus Brief In Support Of The CFSA's Lawsuit Against The CFPB.** [Supreme Court, [07/07/23](#)]

**Americans For Prosperity Has Contributed \$5,400 To The Republican Attorneys General Association Since The CFSA Filed Its Original Lawsuit Against The CFPB In April 2018:**

<b>Contributor</b>	<b>Date Of Contribution</b>	<b>Amount</b>	<b>Source</b>
Americans For Prosperity	01/06/22	\$400	<a href="#">Link</a>
Americans For Prosperity	05/18/21	\$5,000	<a href="#">Link</a>
		<b>TOTAL: \$5,400</b>	