

THE COMPANY-CENTRIC CONSUMER FINANCIAL COMPLAINT BUREAU (CFPB) CONSUMER COMPLAINT PROCESS.

ANALYSIS OF SUCCESSFUL ARBITRATIONS CLAIMED BY THE US GOVERNMENT'S CFPB COMPLAINT PROCESS. "THE COMPANY" IS THE JUDGE, JURY, AND APPELLATE OF CONSUMER COMPLAINTS RECEIVED FROM CFPB!

The Current CFPB Complaint Database Claims to have more than 1.5-million Consumer Complaints; but CFPB's Website does not monitor, track, or report monthly, yearly, or aggregate statistics regarding the:

- Percentage of Complaints Closed by "The Company" with No Explanation.
- Percentage of Complaints Closed by "The Company" with Explanation.
- Percentage of Complaints Closed by "The Company" with Monetary Relief.
- Percentage of Complaints Closed by "The Company" with Non-Monetary Relief.
- Percentage of Closed Complaint that were Disputed By Consumers.

The CFPB Website Annual Report should contain Summary Statistics for the following:

- ☐ Trend Analysis of "Top-20 Companies" by Year in each of CFPB Product Categories.
- ☐ Trend Analysis of "Top-20 Companies" by Year in each of CFPB Issue Categories.
- ☐ Percentage of Complaints Referred to Federal Agencies in each Product Category.
- ☐ List of Companies that Refused to Respond to any of its CFPB Consumer Complaints.
- ☐ Summary Of Consumer Complaints By Race, Ethnicity, Gender and Age.
- ☐ Geographical Origin of CFPB Consumer Complaints by Input Source: Email, Phone, Fax, Postal Mail, Referring Federal or State Agency, and Web.
- ☐ Final Resolution of the 145,150 Consumer Complaint Disputes that CFPB "Promised" Consumers that it would investigate.
- ☐ Final Resolution of 23,000 Consumer Complaints Referred to Other Federal, State and Local Consumer Complaint Agencies.
- ☐ CFPB Complaint Process Performance as Rated by Consumers.

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CFPB Complaint Monitor
(Solely Observer/Observer)

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THE COMPANY-CENTRIC CONSUMER FINANCIAL COMPLAINT BUREAU (CFPB) CONSUMER COMPLAINT PROCESS.

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The Center-Piece of the CFPB Complaint Process is the CFPB Complaint Database and the Company Portal; and in theory, these components should CFPB with an advanced, state-of-the-art complaint management architecture. Neither of these components were designed and implemented with the consumer as its control focus:

- ☐ The CFPB Complaint Database should include all pertinent information regarding consumer complaints, including:
 - The racial, ethnic or gender of the consumer.
 - The date upon which the complaint allegation occurred.
 - The estimate of monetary value associated with the complaint.
 - The name of the business unit and parent company against which the complaint is being filed, and;
 - The final resolution of complaint (including name of federal agency, for referred complaints).
- ☐ The design goal of the Company Portal was to:
 - Provide a real-time, web-based electronic portal between the CFPB Complaint Process and the parent company (or business unit) against which the consumer complaint is being filed; but the current implementation of the full-time all-seeing, all-knowing Company Portal goes far beyond this design goal, and includes a number of value-added features including:
 - An archive of all previously filed CFPB Complaint.
 - Interactive Dashboard which includes selectable CFPB Consumer Responses and Public Responses, and;
 - A one-button response generator for formulating responses acceptable to CFPB.

The value-added features contained in the Company Portal greatly enhance The Company's ability to quickly respond to CFPB complaints, but also provides The Company with a searchable consumer complaint archive that contains responses to previous CFPB complaints filed by all consumers. This enables The Company to respond to CFPB complaints with the same response used for similar CFPB complaints from the same consumer or other consumers.

COMPLAINTS FILED WITH CFPB:
"THE COMPANY" ALWAYS WINS!

CFPB Complaint Monitor
(Solely Observer/Observer)

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CFPB CONSUMER COMPLAINT PROCESS: "PERSONIFICATION OF THE WIZARD OF OZ COMPLAINT ADJUDICATION."

CFPB HAS ALLOWED "THE COMPANY TO BECOME THE GREAT AND POWERFUL ARBITRATOR OF CFPB CONSUMER COMPLAINTS." THIS, BY DEFAULT THE COMPANY IS THE "JUDGE, JURY, AND APPELLATE" OF THE CFPB COMPLAINT PROCESS. THIS IS THE REAL-LIFE PERSONIFICATION OF THE FABLED "WIZARD OF OZ" COMPLAINT ADJUDICATION PROCESS. CFPB PROVIDES "THE COMPANY" WITH A FREE, "ALL-SEEING, ALL-KNOWING" PORTAL APP WHICH PROVIDES UNRESTRICTED ACCESS TO BOTH CURRENT AND ARCHIVED CONSUMER COMPLAINTS. THE COMPANY PORTAL APP ALSO INCLUDES "BOILERPLATE CONSUMER AND PUBLIC RESPONSES," WHICH ARE READILY-ACCEPTABLE AND APPROVED BY THE CFPB COMPLAINT PROCESS.

"THE COMPANY"

CFPB Complaint Data, Archived Complaints, Consumer Responses, and CFPB Complaint Database.

"THE COMPANY IS THE GREAT AND POWERFUL ARBITRATOR"

"FOLLOW THE YELLOW-BRICK COMPANY PORTAL." BETWEEN 2013 AND 2020, MORE THAN ONE AND A HALF MILLION CFPB CONSUMER COMPLAINTS WERE SENT TO "THE COMPANY" VIA EMERALD CITY'S INSIDIOUS "COMPANY PORTAL."

WHEN "THE GREAT AND POWERFUL COMPANY ARBITRATOR" MALEVOLENTLY RENDERS ITS DECISIONS: "THE COMPANY" WINS 85% TO 95% OF ALL COMPLAINT ARBITRATIONS; AND THERE IS NO CFPB DISPUTE OF THE ARBITRATOR'S DECISIONS.

ALL CONSUMER COMPLAINTS FILED WITH CFPB ARE CLOSED WITH THE "CFPB KISS OF DEATH APPROVAL," ENSURING THAT THERE IS NO APPEAL OF THE "COMPANY'S WIZARD OF OZ" ADJUDICATION.

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THE COMPANY-CENTRIC CFPB CONSUMER COMPLAINT PROCESS.

SELECTIVE ENFORCEMENT OF FEDERAL LAWS, "LET THEM EAT CAKES!"

RACIAL DISPARITIES IN CRIMINAL JUSTICE, CONSUMER FINANCE, EMPLOYMENT OPPORTUNITIES, PUBLIC EDUCATIONAL AND HEALTHCARE SYSTEMS ARE THE DIRECT RESULT OF THE LACK OF FEDERAL GOVERNMENT ENFORCEMENT OF EXISTING FEDERAL LAWS, ACTS, AND REGULATIONS.

"THE CFPB KISS OF DEATH APPROVAL" OF THE COMPANY'S ADJUDICATION RESPONSE CARRIES THE "FULL" WEIGHT OF THE FEDERAL GOVERNMENT!

Consumer complaints filed by CFPB are adjudicated solely by The Company, and the minor role that CFPB fulfills is to follow The Company's instructions regarding closing complaints by applying "The CFPB 'Kiss of Death Approval'" to The Company's complaint arbitration. This "Kiss of Death Approval" has the full weight of the Federal Government, and thus, it assures that a closed CFPB Consumer Complaint can never be re-filed against "The Company" by CFPB or any other Federal Government Agency. Additionally, private and class-action attorneys will be reluctant to pursue legal action in "the courts" because of the legal precedent of this Federal government's approval of The Company's adjudication of the original consumer complaint.

THE COMPANY-CENTRIC CFPB COMPLAINT PROCESS:
"THE COMPANY ALWAYS WINS!"

CFPB Complaint Monitor
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CFPB HAS ALLOWED BANKS, MORTGAGE LENDERS, AND OTHER FINANCIAL SERVICES INSTITUTIONS TO ACT AS JUDGE, JURY, AND APPELLATE FOR ALL DISCRIMINATION COMPLAINTS FILED VIA THE CFPB CONSUMER COMPLAINT PROCESS. THIS DERELICTION OF ITS MISSION OF "ENFORCING LAWS THAT OUTLAW DISCRIMINATION IN CONSUMER FINANCE" AS DEFINED BY THE US CONGRESS, HAS GREATLY FORTIFIED ONE OF THE FIVE PILLARS OF SYSTEMIC RACIAL DISPARITY THAT DIVIDE AMERICA. CFPB'S BENIGN NEGLECT, "LET THEM EAT CAKE" APPROACH TO DISCRIMINATORY CONSUMER COMPLAINTS, MANIFESTS ITSELF IN ITS WILLINGNESS TO ENDORSE "THE COMPANY'S" ADJUDICATIONS OF DISCRIMINATORY COMPLAINTS WITH ITS DREADED "CFPB KISS OF DEATH APPROVAL", ENSURING THAT THEY CAN NEVER BE REOPENED.

PILLARS OF SYSTEMIC RACIAL DISPARITY THAT DIVIDE AMERICA*

RACIAL DISPARITIES IN CRIMINAL JUSTICE, CONSUMER FINANCE, EMPLOYMENT OPPORTUNITIES, PUBLIC EDUCATIONAL AND HEALTHCARE SYSTEMS ARE THE DIRECT RESULT OF THE LACK OF FEDERAL GOVERNMENT ENFORCEMENT OF EXISTING FEDERAL LAWS, ACTS, AND REGULATIONS.

PILLARS OF SYSTEMIC RACIAL DISPARITY WHICH DIVIDE AMERICA*

1. RACIALLY-BIASED JUSTICE AND FEDERAL CRIMINAL JUSTICE SYSTEMS
2. INADEQUATE EMPLOYMENT OPPORTUNITIES FOR AFRICAN AMERICANS
3. RACIALLY-BIASED PUBLIC EDUCATION SYSTEMS
4. INADEQUATE PUBLIC EDUCATION SYSTEMS
5. INADEQUATE PUBLIC HEALTHCARE SYSTEMS
6. RACIALLY-BIASED HEALTHCARE AND SELECTIVE ENFORCEMENT OF LAWS, ACTS, AND REGULATIONS BY GOVERNMENT AGENCIES

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(Sincerely, Always, and Forever)

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WHAT IS THE MISSION OF CFPB?

THE CFPB WEBSITE AT [HTTP://WWW.CFPB.GOV/PROCESS](http://WWW.CFPB.GOV/PROCESS) STATES THAT THE "CENTRAL MISSION OF CFPB...IS TO MAKE MARKETS FOR CONSUMER FINANCIAL PRODUCTS AND SERVICES WORK FOR AMERICANS—WHETHER THEY ARE APPLYING FOR A MORTGAGE, CHOOSING AMONG CREDIT CARDS, OR USING ANY NUMBER OF OTHER CONSUMER FINANCIAL PRODUCTS". IN 2016 ALONE MOST OF THE HUNDREDS OF THOUSANDS OF CONSUMER COMPLAINTS ABOUT THEIR FINANCIAL SERVICES—including BANKS AND CREDIT CARD ISSUERS—WERE RECEIVED AND COMPILED BY CFPB AND ARE PUBLICLY AVAILABLE ON A FEDERAL GOVERNMENT DATABASE, KNOWN AS THE CFPB COMPLAINT DATABASE.

CFPB MISSIONS INCLUDE:

- ❑ ROOTING OUT UNFAIR, DECEPTIVE, OR ABUSIVE ACTS OR PRACTICES BY WRITING RULES, SUPERVISING COMPANIES, AND ENFORCING THE LAW.
- ❑ ENFORCING LAWS THAT OUTLAW DISCRIMINATION IN CONSUMER FINANCE.*
- ❑ TAKING CONSUMER COMPLAINTS.
- ❑ ENHANCING FINANCIAL EDUCATION.
- ❑ RESEARCHING THE CONSUMER EXPERIENCE OF USING FINANCIAL PRODUCTS.
- ❑ MONITORING FINANCIAL MARKETS FOR NEW RISKS TO CONSUMERS.

* Although, "enforcing laws that outlaw discrimination" was one of the six missions of CFPB as defined by the 2011 Dodd-Frank Wall Street Reform and Consumer Protection Act, it countermanded in the Notice of Final Policy Statement approved by the CFPB Executive Director on March 25, 2013.

COMPLAINTS FILED WITH CFPB:
"THE COMPANY" ALWAYS WINS!

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DRIVING FORCE BEHIND THE CREATION OF CFPB, THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB), ESTABLISHED UNDER DODD-FRANK, WAS GIVEN THE JOB OF PREVENTING PREDATORY MORTGAGE LENDING (REFLECTING THE WIDESPREAD SENTIMENT THAT THE SUBPRIME MORTGAGE MARKET WAS THE UNDERLYING CAUSE OF THE 2008 CATASTROPHE) AND MAKE IT EASIER FOR CONSUMERS TO UNDERSTAND THE TERMS OF A MORTGAGE BEFORE AGREEING TO THEM. IT DETERS MORTGAGE BROKERS FROM EARNING HIGHER COMMISSIONS FOR CLOSING LOANS WITH HIGHER FEES AND/OR HIGHER INTEREST RATES AND REQUIRES THAT MORTGAGE ORIGINATORS NOT STEER POTENTIAL BORROWERS TO THE LOAN THAT WILL RESULT IN THE HIGHEST PAYMENT FOR THE ORIGINATOR.

The "DRIVING FORCE" behind the creation of CFPB was to ensure that consumers were protected from Predatory Mortgage Lenders; however, because of design flaws in the CFPB Complaint Process and CFPB Database there is no way to determine if CFPB has ever take legal action against "any Company Accused of Predatory Lending or Mortgage Fraud Crimes."

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THE CFPB COMPLAINT PROCESS HAS FAILED! WHEN THE LEGISLATION THAT CREATED THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) IN 2010, IT WAS A DIRECT RESPONSE TO THE FINANCIAL CRISIS OF 2008 AND WAS INTENDED TO PREVENT A REOCCURRENCE OF THIS NEAR CATASTROPHIC COLLAPSE OF THE ENTIRE US ECONOMIC STRUCTURE. CFPB WAS TO BE THE US GOVERNMENT AGENCY TASKED WITH ENSURING THAT BANKS, LENDERS, AND OTHER FINANCIAL SERVICES COMPANIES TREAT CONSUMER FAIRLY BY PROVIDING GREATER PROTECTION AND ESTABLISHING EQUAL RIGHTS TO CONSUMERS OF FINANCIAL PRODUCTS. UNFORTUNATELY, THE CFPB THAT EXIST TODAY IS A COMPANY-CENTRIC PROCESS THAT HAS ALLOWED "THE FINANCIAL INSTITUTIONS IT WAS EMPOWERED TO REGULATE"; TO ACT AS JUDGE, JURY, AND APPELLATE FOR ITS VAULTED CFPB COMPLAINT ADJUDICATION PROCESS. IN 2013, IT CHOSE NOT TO INCLUDE THE ADJUDICATION OF RACIAL DISCRIMINATORY COMPLAINTS WITHIN ITS SPHERE OF CONTROL, AND THIS OVERT OMISSION HAS GREATLY BUTRESSED THE PILLARS OF SYSTEMIC RACIAL DISPARITY THAT DIVIDE AMERICA.

The CFPB Database include almost two million closed CFPB Consumer Complaints, but none of these closed complaints were for race, ethnic, gender, age or religious discrimination.

CFPB Complaint Monitor
(Sincerely, Always, and Forever)

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THE COMPANY-CENTRIC CONSUMER COMPLAINT PROCESS.

THE CFPB COMPLAINT PROCESS IS NOW IN ITS EIGHTH YEAR OF OPERATION AND IS WITHOUT A DOUBT "THE GREATEST CONSUMER PROTECTION FACADE EVER PERPURTRATED UPON THE AMERICAN CONSUMER!" UNFORTUNATELY, THIS FAÇADE EXTENDS FAR BEYOND THE CFPB ORGANIZATION AND PERSONIFIED BY OTHER FEDERAL CONSUMER COMPLAINT/CONSUMER PROTECTION AGENCIES THAT CONTINUE TO BLINDLY TO REFER COMPLAINTS TO CFPB WITHOUT BOTHERING TO VERIFY THAT THE AMERICAN CONSUMER IS PROTECTED.

FROM DECEMBER 1, 2011 TO MARCH 25, 2017

Consumer complaints filed by cfpb are adjudicated solely by "the company" and the minor "house-keeping" role that cfpb fulfills is to follow the company's instructions regarding closing complaints by applying "the cfpb kiss of death approval" to the company's complaint arbitration. This "kiss of death approval" has the full weight of the federal government. This assures that a consumer complaint closed with the cfpb "kiss of death approval" can never be re-fined against "the company" by cfpb or any other federal government agency. Additionally, private and class-action attorneys are reluctant to pursue legal action in the courts because of the legal precedent of the federal government's approval of the company adjudication of the complaint.



CFPB Complaint Monitor
(Only Complaints for Consumers)

THE COMPANY-CENTRIC CFPB COMPLAINT PROCESS:
"THE COMPANY ALWAYS WINS!"

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2017 and 2019 "STANDING UP FOR THE YOU" CLAIMS ON HOMEPAGE OF CFPB.GOV WEBSITE. (Page 1/2)



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2017 and 2019 "STANDING UP FOR THE YOU" CLAIMS ON HOMEPAGE OF CFPB.GOV WEBSITE. (Page 2/2)

Top-24 of 2,560 COMPANIES WHO DID NOT RESPOND TO CFPB CONSUMER COMPLAINTS IN A TIMELY MANNER BETWEEN 2016 AND 2019.

Rank	Company	2016	2017	2018	2019	Total
1	WELLS FARGO & COMPANY	1550	1552	268	428	3378
2	ECURAF, INC.	1	1253	6	133	1575
3	Colony Brands, Inc.	59	165	145	62	431
4	Midwest Recovery Systems	214	16	11	67	288
5	Southwest Credit Systems, L.P.	234	21	5	1	265
6	Mediobank, LLC	52	124	44	1	224
7	Amerihealth Financial	1	120	130	59	189
8	Credit Karma, Inc.	41	35	85	161	161
9	Collection Bureau of America Ltd.	6	65	43	35	149
10	Altitude Services Corporation	1	15	73	52	141
11	First Advantage LMS Inc.	22	35	48	37	142
12	Riverbank Financial Corporation	24	85	12	123	142
13	Moneta, Inc.	1	1	125	109	136
14	TENET HEALTHCARE CORPORATION	37	4	24	23	101
15	Direct Recovery Services, LLC	13	18	24	23	98
16	TRANSUNION INTERMEDIATE HOLDINGS, INC.	2	66	13	14	95
17	Reed Recovery, LLC	16	43	23	7	89
18	National Credit Systems, Inc.	25	11	40	7	83
19	Integrated Recovery Services	63	19	2	4	88
20	HSBC NORTH AMERICA HOLDINGS INC.	80	5	1	1	87
21	FIDELITY CAPITAL HOLDINGS, INC.	16	25	15	33	89
22	On-Site Manager, Inc.	15	20	46	10	81
23	Credit Collections U.S.A. L.L.C.	11	20	29	16	80
24	1st Franklin Financial Corporation	4	12	33	24	78
Grand Total: Complaints with timely or No Response		2546	3308	1088	1258	8200

Source: 2016-2019 CFPB Consumer Complaint Database.

EXAGGERATED AND UNSUBSTANTIATED CLAIMS OF "STAND UP FOR THE AMERICAN CONSUMER."

However, the website statistic quoting a 97% timely reply from "The Company" does not tell the real story regarding "Timely Replies" to CFPB Consumer Complaints. Between 2016 and 2019, a total of 8,251 of the twenty-four companies shown above did not reply in a timely manner, and this is the final response from "The Company" shown in the CFPB Complaint Database. The 1,550 complaints that Wells Fargo did not reply to in a timely manner during 2016 are alarming because this was the year that bank was found guilty of creating tens of thousands of fraudulent checking and savings accounts, and Mediobank, LLC who received 234 CFPB Consumer Complaints during this 4-year period without responding to any of them. (See more regarding Mediobank, LLC on follow slides.)



CFPB Complaint Monitor
(Only Complaints for Consumers)

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SYSTEMIC RACIAL DISCRIMINATION IS PERPETUATED BY LACK OF ENFORCEMENT OF LAWS, ACTS AND CONGRESSIONAL REGULATIONS BY FEDERAL AGENCIES SUCH AS CFPB.

Rank	Company	2016	2017	2018	2019	Total
1	WELLS FARGO & COMPANY	1550	1552	268	428	3378
2	ECURAF, INC.	1	1253	6	133	1575
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Grand Total: Complaints with timely or No Response		2546	3308	1088	1258	8200

CFPB TURNED A BLIND-EYE EVEN THOUGH MEDIOBANK, LLC. REFUSED TO RESPOND TO MORE THAN THREE HUNDRED AND NINE THOUSAND COMPLAINTS SENT FROM 2011 TO 2019.

One of the high-lighted Companies on the previous slide was Mediobank, LLC, a Louisiana-based Pay-Day Lender. From 2016 to 2019, Mediobank, LLC, received 234 CFPB Consumer Complaints; and although they did not respond to any of them, CFPB continued to send them more consumer complaints, year, after year, after year. The EXCEL Spreadsheet shown above and contained on the following page show that in 2019 CFPB turned a blind eye and sent this Pay-Day Lender twenty-eight more CFPB Complaints and as expected, Mediobank, LLC did not respond to any of them.



CFPB Complaint Monitor
(Only Complaints for Consumers)

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THE COMPANY-CENTRIC CFPB CONSUMER COMPLAINT PROCESS.

"THE CFPB KISS OF DEATH APPROVAL OF THE COMPANY'S ADJUDICATION RESPONSE CARRIES THE "FULL" WEIGHT OF THE FEDERAL GOVERNMENT!"

Consumer complaints filed by CFPB are adjudicated solely by The Company, and the minor role that CFPB fulfills is to follow The Company's instructions regarding closing complaints by applying "The CFPB "Kiss of Death Approval" to The Company's complaint arbitration. This "Kiss of Death Approval" has the full weight of the Federal Government, and thus, it assures that a closed CFPB Consumer Complaint can never be re-filed against "The Company" by CFPB or any other Federal Government Agency. Additionally, private and class-action attorneys will be reluctant to pursue legal action in "the courts" because of the legal precedent of this federal government's approval of The Company adjudication of the original consumer complaint.

THE COMPANY-CENTRIC CFPB COMPLAINT PROCESS:
"THE COMPANY ALWAYS WINS!"

CFPB Complaint Monitor
(Only One-Sidedly Observed)

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THE COMPANY-CENTRIC CFPB CONSUMER COMPLAINT PROCESS.

[Docket No. CFPB-2012-0023]
 Disclosure of Consumer Complaint Data,
 AGENCY: Bureau of Consumer Financial Protection.
 ACTION: Notice of Final Policy Statement Regarding Discrimination

Consumer groups and trade associations mainly reiterated comments made in response to the Credit Card Data Proposed Policy Statement. Consumer groups generally favored the inclusion of the data, and industry groups commented that it should remain excluded. The trade association suggested eliminating the field from the complaint intake forms altogether, citing a lack of meaningful data and evidence of value in its collection. Some consumer groups, however, suggested that the Bureau request protected class information to assist in the detection of patterns and practices of lending and credit discrimination, and provide an explanation to consumers as to the value in collecting such information. *The Bureau is continuing to refine its methods for identifying discrimination allegations in complaints submitted by consumers. Accordingly, the Bureau does not plan to disclose discrimination field data in the public database at this time. In the interim, the Bureau will continue to study the conditions, if any, necessary for the appropriate disclosure of such information at the individual complaint level. The Bureau "may" also report discrimination allegation data at aggregated levels in its own periodic complaint data reports.*

Dated: March 25, 2013.
 Richard Cordray,
 Director, Bureau of Consumer Financial Protection.

The 2013 March 25, 2013, Notice of Final Policy Statement Regarding Discrimination stated that CFPB would not include discrimination in its database, but that CFPB would continue to study "conditions."

CFPB has now had more than seven-year to study the systemic racial disparity which exists in many financial products within its sphere of control, and has chosen a.) not to add discrimination as a "Product" within the CFPB Complaint Process, b.) not add Racial Demographic fields to its public database, or c.) not to expand the Issues and Sub-Issues lists to include all forms of discrimination.

THE COMPANY-CENTRIC CFPB COMPLAINT PROCESS:
"THE COMPANY ALWAYS WINS!"

CFPB Complaint Monitor
(Only One-Sidedly Observed)

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THE SUCCESSFUL COMPLAINT ARBITRATIONS CLAIMED BY CFPB ARE TOO GOOD TO BE TRUE, AND "IF THEY LOOK TOO GOOD TO BE TRUE, THEY ARE TOO GOOD TO BE TRUE!" CFPB IS THE PERSONIFICATION OF "EMERALD CITY ILLUSION." CFPB TAKES NO MEANFUL ROLE IN THE ACTUAL CONSUMER COMPLAINT ARBITRATION PROCESS, CLAIMS ALL COMPLAINTS FILED BY CONSUMERS AS SUCCESSFUL COMPLAINT ADJUDICATIONS.

CFPB SHOULD HAVE ALERTED CONSUMERS ABOUT COMPANIES ALREADY BEING INVESTIGATED FOR FEDERAL CRIMES, AND CONSUMER COMPLAINTS BEING FILED AGAINST THESE COMPANIES SHOULD HAVE REVIEWED BY CFPB ENFORCEMENT UNIT TO DETERMINE IF COMPLAINTS WERE RELATED TO DOJ INVESTIGATIONS.

TWO REAL-LIFE EXAMPLES WHERE THEY MAY HAVE HELPED CONSUMERS:

- In 2013, the DOJ found JPMorgan Chase and Company guilty of mortgage origination related "crimes" which may have adversely affected tens of thousands of African Americans and other financially-distressed consumers, yet there was no mention of this landmark lawsuit. The Department of Justice (DOJ) identified more than two-hundred Thousand non-conforming, "Toxic Mortgages" originated by JPMorgan Chase Bank at its Chase Home Loan Direct Center in Fort Washington, Pennsylvania, and many of these Chase-originated mortgages may have been eligible for the \$4-Billion Consumer Relief Restitution included in this settlement.
- In 2016, Wells Fargo Bank, National Association, was found guilty of opening tens-of-thousands checking and savings accounts without the knowledge or approval of customers. Although Wells Fargo Bank Wells Fargo was fined more than three billion dollars, none of this fine was paid directly to consumers; but, the bank "promised" to compensate consumers for potential losses. Serendipitously, in 2015, before this crime was discovered, the number of consumers filing CFPB complaints increased from by 10.8% while consumer complaints against Bank of America, JPMorgan Chase Bank and Citibank decreased by 13.0%, 13.9%, and 16.8%, respectively. Even more suspicious, the number of CFPB Consumer Complaints in 2015 versus 2016 against Wells Fargo Bank for CFPB Issue: Account Opening, Closing, or Management increased by 67.3%, the percentage of consumers receiving monetary relief only increased 0.7% from 2015 to 2016; leading to the conclusion that the vast Majority of consumers filing 2016 CFPB Complaints about compensation received the same or less than as the 2015 complainants received before Wells Fargo Bank plot guilty to these criminal offenses.

THE COMPANY "ALWAYS WINS!"

CFPB Complaint Monitor
(Only One-Sidedly Observed)

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THE SUCCESSFUL COMPLAINT ARBITRATIONS CLAIMED BY CFPB ARE TOO GOOD TO BE TRUE, AND "IF THEY LOOK TOO GOOD TO BE TRUE, THEY ARE TOO GOOD TO BE TRUE!" CFPB IS THE PERSONIFICATION OF "EMERALD CITY ILLUSION." CFPB TAKES NO MEANFUL ROLE IN THE ACTUAL CONSUMER COMPLAINT ARBITRATION PROCESS, CLAIMS ALL COMPLAINTS FILED BY CONSUMERS AS SUCCESSFUL COMPLAINT ADJUDICATIONS.

THE POORLY-DESIGNED CFPB DATABASE DOES NOT EVEN INCLUDE BASIC COMPLAINT-RELATED DATA, SUCH AS THE DATE OF THE COMPLAINT OCCURRED OR AN APPROXIMATION OF MONETARY LOSS BY CONSUMERS. ADDITIONALLY, THE DATABASE DOES NOT INCLUDE ANY MEANFUL COMPLAINT SUMMARIES, INCLUDING:

- Number of complaints Arbitrated by each company with NO Explanation Responses.
- Number of complaints Arbitrated by each company with Explanation Responses.
- Number of complaints Arbitrated by each company with Monetary Relief Responses.
- Number of complaints Arbitrated by each company with Non-Monetary Relief Responses.
- Number of complaints Arbitrated by each company that were then closed by consumers.

THE CFPB DATABASE SHOULD PROVIDE CONSUMERS WITH THE SAME TYPE INFORMATION AVAILABLE TO "THE COMPANY" VIA THE COMPANY PORTAL:

- List of offending "COMPANIES" by Year in each of the Product Categories.
- Number of Complaints Referred to other Federal Agencies in each Product Category.
- List of Companies that "REFUSED" to respond to any of its CFPB Complaint.
- (In one instance, CFPB continued to send "NEW" complaints to one "Unlabeled Pay-Day Lender" for 5 consecutive years without receiving a single response.)

THE CFPB DATABASE DOES NOT CONTAIN ANY RECORDS OF CFPB CONSUMER COMPLAINTS FILED FOR ANY TYPE DISCRIMINATORY PRACTICES DURING ITS SEVEN-YEAR HISTORY. HOWEVER, ANALYSIS OF CFPB COMPLAINT TYPES (ALL CFPB PRODUCTS) SHOW THAT CFPB COMPLAINTS FILED FOR PRODUCTS SUCH AS PAY-DAY LOANS, DEBT COLLECTION, PREPAID CARD, AND MONEY TRANSFERS ARE UNLIKELY TO RECEIVE A FAVORABLE ARBITRATION RULING AS COMPARED TO CFPB PRODUCTS SUCH AS CREDIT CARDS, CONSUMER LOANS, OR BANK ACCOUNTS. IF RACIAL DEMOGRAPHICS WERE INCLUDED IN THE CFPB DATABASE, AFRICAN AMERICANS CONSUMERS WOULD COMPOSE THE VAST MAJORITY OF THE FORMER PRODUCT CATEGORY.

"THE COMPANY "ALWAYS WINS!"

CFPB Complaint Monitor
(Only One-Sidedly Observed)

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COMPARISON OF THE ARBITRATION OF CFPB MORTGAGE COMPLAINTS VERSUS ALL CFPB NON-MORTGAGE COMPLAINTS PROCESS.

THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) WAS ESTABLISHED IN 2010 BY THE DODD-FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT AS A MECHANISM TO ENSURE THAT CONSUMERS WERE PROTECTED FROM A RE-OCCURRENCE OF THE SUBPRIME MORTGAGE LENDING FRENZY THAT OCCURRED FROM 2004 THROUGH 2008. HOWEVER, AS THE TWO COMPARATIVE ANALYSIS TABLES BELOW ILLUSTRATE, HOME MORTGAGE LENDERS ARE NOW IN FIRM CONTROL OF THE HOME MORTGAGE INDUSTRY AND HAVE A WINNING PERCENTAGE OF ALMOST 92% OF ALL CFPB CONSUMER COMPLAINTS. THIS WINNING PERCENTAGE IS MORE THAN SIXTEEN PERCENT HIGHER THAN NON-MORTGAGE COMPLAINTS.

COMPANY WINNING AND LOSING PERCENTAGE FOR MORTGAGE COMPLAINTS.							
Mortgage Product	2013	2014	2015	2016	2017	Total	Average
Closed	1564	2453	1167	82	94	4680	2.0%
Closed with explanation	42723	38288	37885	37622	8836	165342	85.7%
Closed with monetary relief	1323	9550	1390	1278	238	5199	2.8%
Closed with non-monetary relief	3760	1833	2322	1971	248	9334	5.1%
Unlabeled response	33	45	99	118	44	339	0.2%
Unlabeled response	33	45	99	118	44	339	0.2%
Mortgage Total	48428	42966	42374	41472	6463	182603	100.0%

COMPANY WINNING AND LOSING PERCENTAGE FOR ALL NON-MORTGAGE COMPLAINTS.							
Non-Mortgage Products	2013	2014	2015	2016	2017	Total	Average
Closed	1461	2552	3684	2655	827	10580	2.2%
Closed with explanation	36355	78892	93217	115641	29035	354300	73.5%
Closed with monetary relief	7387	8292	9170	10684	2088	37829	7.5%
Closed with non-monetary relief	16408	18999	19218	21488	4148	77661	15.7%
Unlabeled response	44	855	997	1358	468	3322	0.7%
Non-Mortgage Total	58918	110121	126217	130032	36577	481765	100.0%

Source: January 1, 2013 to March 26, 2017 CFPB Consumer Complaint Database



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THE COMPANY-CENTRIC DESIGN OF THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) COMPLAINT PROCESS, PROTECTS "THE COMPANY" RATHER THAN "THE CONSUMER"! IT IS DESIGNED TO ENSURE THAT THE COMPANY ALWAYS WINS!

CFPB'S "ALL-SEEING" COMPANY PORTAL IS PROVIDED TO "THE COMPANY" AT NO COST AND INCLUDES CRM-TYPE APPLICATIONS AND CONSUMER COMPLAINT DATA THAT GREATLY SIMPLIFY AND FACILITATE THE RESOLUTION OF CONSUMER COMPLAINTS. IT ALSO INCLUDES A "ONE-BUTTON" COMPLAINT RESPONSE APPLET THAT SELECT THE APPROPRIATE COMPLAINT CLOSED RESPONSE AND SELECT THE OPTIONAL PUBLIC RESPONSE TO BE ADDED TO THE CFPB COMPLAINT DATABASE.



The conceptual design concept of the Company Portal was excellent, because it would provide an electronic conduit that would eliminate many of the manual activities involving in: a.) sending complaints from the CFPB Complaint Process to "The Company", and b.) receiving "The Company" responses to these complaints; however, the current implementation of the Company Portal exceeds these basic "electronic conduit" requirements, and includes enhanced, value-added functionality that exceeds initial conceptual portal design. For example, the current implementation of the Company Portal automated many of "The Company's" arbitration complaint review/investigation functions; because it includes an archive of how all previous complaints from the consumer were adjudicated. It also a "one-button" option for sending "Closed and/or Public Response to CFPB". However, 2015-2017 version of "The Company Portal" did not include any provisions for handling consumer disputes; thus between 2015 and 2017, CFPB chose not to place any of the 145,150 complaint disputes filed by consumers on the "all-seeing, all-knowing" Company Portal.

COMPLAINTS FILED WITH CFPB:
"THE COMPANY" ALWAYS WINS!



CFPB Complaint Monitor
(Only Complaints for Consumers)

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THE OPERATIONAL CHARACTERISTICS OF THE CFPB "ALL-SEEING, ALL-KNOWING" COMPANY PORTAL ARE HIDDEN FROM CONSUMERS, BUT IT IS THE PRIMARY BASIS UPON WHICH ALL CFPB COMPLAINTS ARE ADJUDICATED BY THE COMPANY. THE INSIDIOUS, "ALL-SEEING, ALL-KNOWING" COMPANY PORTAL INCLUDES A COMPLAINT ARCHIVAL DATABASE AND MULTIPLE COMPLAINT ADJUDICATION FORMS THAT ALLOWS "THE COMPANY" TO SELECT FROM: (1) "CANNED (OR BLANK) PUBLIC RESPONSES", (2) "SUGGESTED, ONE-BUTTON CONSUMER ADJUDICATION RESPONSES", (3) "CANNED CLOSED RESPONSES, WITH (OR WITHOUT) EXPLANATION", AND CAN SPECIFY WHICH, "IF ANY", OF "THE COMPANY'S" PUBLIC RESPONSES CAN BE SHARED WITH REGULATORS AND/OR OTHER CONSUMERS. THE COMPANY PORTAL ALSO ENABLES "THE COMPANY" TO SPECIFY A WHETHER OR NOT CLOSED COMPLAINTS CAN BE ARCHIVED IN "THE GOVERNMENT'S" CFPB COMPLAINT DATABASE, THUS, ENSURING THAT ONLY COMPLAINT ADJUDICATIONS THAT "APPEAR TO BE FAIR AND UNBIASED" ARE ARCHIVED IN THIS PUBLIC DATABASE.

1. Company Portal Dashboard

Complaints

What is the company's response?

Unlabeled response options

2. Streamlined Complaint Response Form



CFPB Complaint Monitor
(Only Complaints for Consumers)

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STARTING IN 2015, THE COMPANY PORTAL PROVIDED "THE COMPANY" WITH A LIST OF "ACCEPTABLE" PUBLIC RESPONSES, AND 1.) THESE PUBLIC RESPONSES WERE ALSO USED AS THE "EXPLANATION" IN THE CLOSED WITH EXPLANATION RESPONSE; HOWEVER, CFPB ALSO ALLOWED THE PUBLIC RESPONSE FIELD TO BE "LEFT BLANK", WHICH WAS DONE BY "THE COMPANY" 75.68% OF THE TIME. HOWEVER, IF THIS FIELD IS BLANK, IT IS UNCLEAR HOW "THE COMPANY" COMPLAINT NARRATIVE WAS REPORTED TO THE CONSUMER AND WHY THIS CRITICALLY-IMPORTANT INFORMATION IS NOT INCLUDED IN THE CFPB COMPLAINT DATABASE.

What is the company's response?

Response definitions

What is your response to this complaint?

32,000 characters remaining



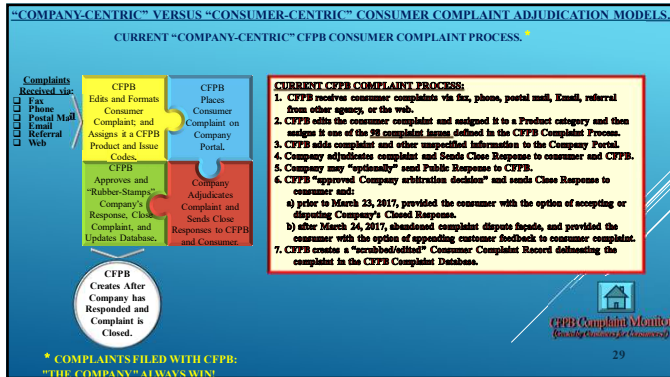
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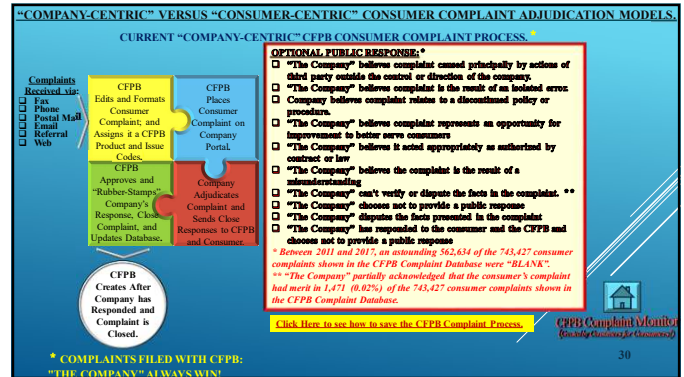
COMPLAINTS FILED WITH CFPB:
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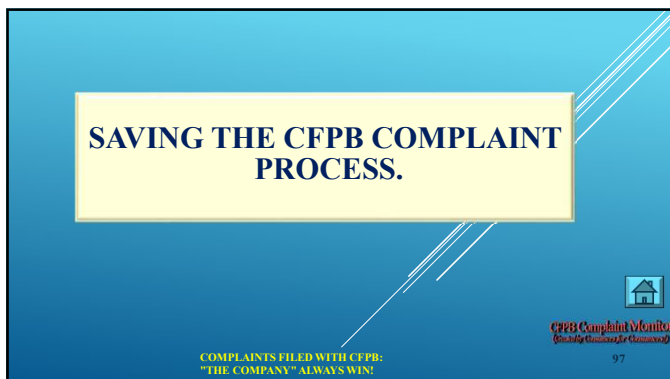
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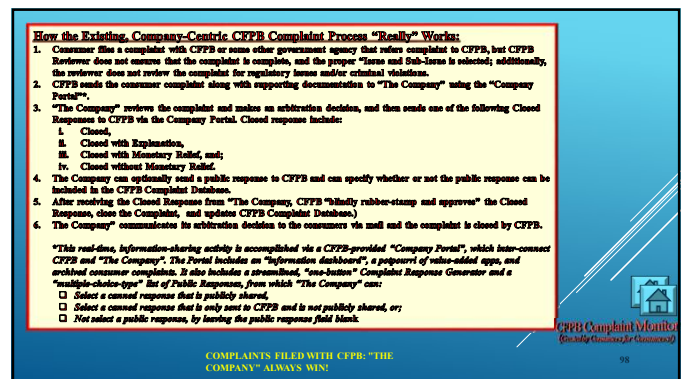
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"SAVING THE CFPB COMPLAINT PROCESS."

IF THE CONSUMER ACCEPTS THE COMPANY RESPONSES, THEN THE COMPLAINT IS CLOSED, CFPB ARCHIVES COMPLAINT RECORD, AND NO FURTHER ACTION IS REQUIRED BY EITHER CFPB OR THE COMPANY.

HOWEVER, IF THE CONSUMER DOES NOT ACCEPT "THE COMPANY" RESPONSE, THEN:

1. **CONSUMER MUST BE GIVEN THE OPTION TO "FORMALLY" DISPUTE THE COMPANY'S RESPONSE, INCLUDING THE OPPORTUNITY TO CREATE A DISPUTE NARRATIVE THAT WOULD NOT BE IMMEDIATELY BE SHARED WITH "THE COMPANY".**

2. **THE CFPB RESPONSE UNIT WOULD REVIEW THE DISPUTED COMPLAINT AND COMPANY RESPONSE NARRATIVE, AND ROUTE THE COMPLAINT VIA "THE AGENCY PORTAL" TO ONE OF THE FOLLOWING FEDERAL AGENCIES:**

- ☐ Civil Rights Division
- ☐ Housing & Civil Enforcement
- ☐ OCC - Consumer Assistance Group
- ☐ FTC - Complaint Assistant
- ☐ HUD - Office of Fair Housing and Equal Opportunity
- ☐ CFPB Enforcement

FINALLY, CFPB WOULD ADD A VARIETY QUARTERLY AND ANNUAL CONSUMER COMPLAINT REPORTS TO ITS WEBSITE, SUGGESTED AREAS TO BE MEASURED INCLUDE: DEMOGRAPHICS OF CONSUMER USING THE SITE, ADDITIONALLY, PRODUCTS, ISSUES, COMPANIES, REFERRALS, AND RESULTS OF CONSUMER SATISFACTION SURVEYS.

The current Company Portal minus the "one button" adjudication response generator and the value-added complaint archival feature would the perfect "Agency Complaint Portal".

**COMPLAINTS FILED WITH CFPB:
"THE COMPANY" ALWAYS WIN!**



CFPB Complaint Monitor
(Specially Designed for Consumers)

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"CONSUMER-CENTRIC" CFPB COMPLAINT DATABASE MODEL (w/Red-Highlighted for New or Modified Data)		
Name of Database Field	Description of Database Field	Information Contained in Database Field
Date_received_by_CFPB	Dates Complaint Received and/or Reviewed.	Date (mm/dd/yyyy)
Date_of_Incident	Date Incident Occurred.	Date (mm/dd/yyyy)
Company Portal Available	CFPB Company Portal.	Yes or No.
Product	Name of Product.	Link to List of Products.
Sub-product	Name of Sub-Products.	Link to List of Sub-Products.
Issue w/Racial Discrimination	Name of Issue.	Link to List of Issues and Sub-Issues.
Sub-issue w/Racial Discrimination	Name of Sub-Issues.	Expanded Sub-Issues, e.g., Consumer Demographics.
Consumer_complaint_description	Text from CFPB complaint form.	Same as description in Consumer Portal.
Consumer_complaint_valuation	Estimated monetary value of complaint.	Monetary value of complaint expressed in dollars.
Company_adjudication_explanation	Company adjudication explanation to Complaint.	Replace public response (no blanks allowed).
Company	Company Name.	Company/Corporate Name.
Company_Business_Unit	Company Business Unit Name.	Company Business Unit Named in CFPB Complaint.
MSAMD	Consumer MSAMD Number.	MSAMD.
State_code	Consumer State.	State Code.
ZIP_code	Consumer Zip Code.	Zip Code.
Demographic Fields	HMDA-type Demographic Codes (Opt-In).	1.) Racial Category, 2.) Ethnic Category, 3.) Gender, 4.) Age, Etc.
Consumer_consent_provided?	Consumer Consented to Share Complaint?	Yes or No.
Submitted_via	How Complaint Submitted.	Email, Fax, Phone, Postal Mail, Referral or Web.
Referred_from_Agency_Name	Referring Agency Name.	Referring Agency Name (and optional address).
Date_placed_on_Company_Portal	Date Complaint Placed, Company Portal.	Date (mm/dd/yyyy).
Company_response_to_consumer	Company Response to Consumer.	Only Responses: Closed with no Relief and Closed with Relief.
Date_Company_Response_Received	Response From Company.	Date (mm/dd/yyyy).
Final_disposition_of_complaint	Final Disposition of CFPB Complaint.	1.) Closed, 2.) Disputed by Consumer, 3.) Referred by CFPB.
Name of Referred (to) Agency	Name of Agency to which complaint is referred.	Name of Referred Agency.
Date_Referred (to) Field	Date complaint referred to another agency.	Date (mm/dd/yyyy).
Complaint_ID	Complaint Identification Number.	Complaint number assigned when complaint created.

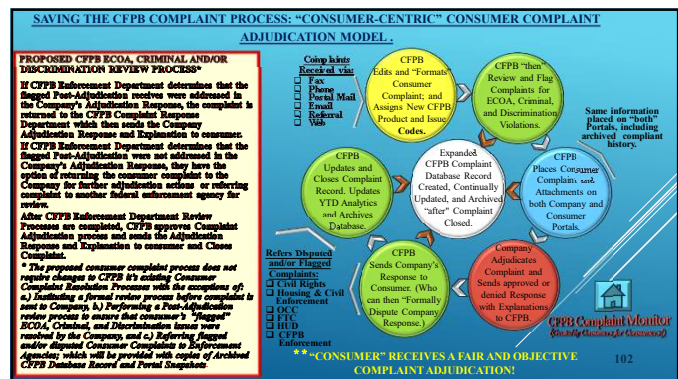
A new CFPB Complaint Database will be created on January 1st of each year, and after this date, only to-progress updates can be made to the previous year's database. CFPB databases for the last two years will be available on-line, and CFPB Databases older than two years will be archived in the National Archive and Records Administration (NARA) Repositories.

CFPB Complaint Monitor
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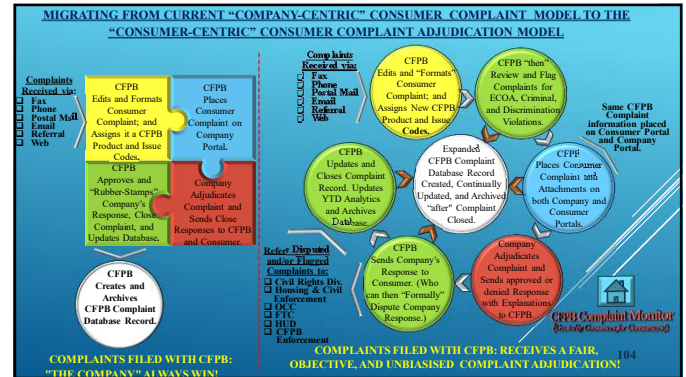
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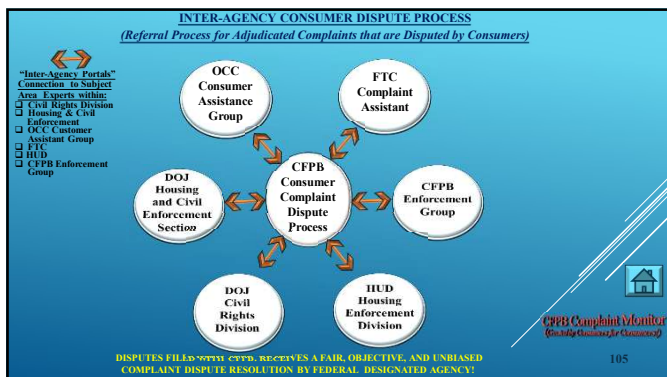
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