

"THE COMPANY" IS THE JUDGE, JURY, AND APPELLATE IN THE CFPB COMPLAINT PROCESS AND CAN ADJUDICATE COMPLAINTS WITHOUT FEAR OF DISPUTES BY CONSUMERS, CFPB, OR OTHER FEDERAL AGENCIES. THE COMPANY'S ARBITRATION RESPONSES ALWAYS RECEIVE CFPB "KISS OF DEATH" APPROVAL, WHICH CARRIES THE WEIGHT OF THE FEDERAL GOVERNMENT. FINALLY, THESE COMPLAINTS ARE "HANDLED TO THE CFPB COMPLAINT BLACKHOLE" FROM WHICH THEY CAN NEVER ESCAPE.

1. THE FLAWED, "COMPLAINT-CENTRIC" CFPB COMPLAINT PROCESS "HANDLED" MORE THAN TWO MILLION CONSUMER COMPLAINTS FROM DECEMBER 2015 TO APRIL 2019, BUT THE CFPB COMPLAINT DATABASE SHOWS THAT THE CFPB COMPLAINT PROCESS PURPOSELY PROTECTED THE OFFENDING COMPANIES RATHER THAN CONSUMERS BY NOT PUBLISHING MINIMAL CFPB COMPLAINT RESOLUTIONS INDICATING THAT THEY HAD THE COMPANY CONTROLLED THE CFPB COMPLAINT PROCESS AND THAT CFPB CONSUMER RESPONSE TOOK AN ACTIVE ROLE IN ADJUDICATING CONSUMER COMPLAINTS, AND "ALWAYS ROBBER-CHANGED" THE ARBITRATION RESPONSE RENDERED BY THE COMPANY.

2. THE POORLY-DESIGNED, COMPANY-CENTRIC CFPB COMPLAINT DATABASE, AND THE ALL-SEEKING, ALL-KNOWING CFPB COMPANY PORTAL, WERE DESIGNED BY THE PRE-EMINENT CRM VENDOR: SALESFORCE.COM, AND ITS LACK OF FUNCTIONALITY AND FEATURES SUPPORTING THE CONSUMER RATHER THAN THE COMPANY IS EVIDENCE FOR POSSIBLE CONCERN REGARDING THE CFPB'S RESPONSE SUPERVISOR.

3. THE CURRENT, COMPANY-CENTRIC CFPB COMPLAINT PROCESS DOES NOT:

- SPECIFY HOW NARRATIVES AND ATTACHMENTS WILL BE USED IN THE COMPLAINT ARBITRATION.
- IDENTIFY THE REFERENCING AGENCY FROM WHICH THE REFERRED CFPB CONSUMER COMPLAINT WAS RECEIVED.
- IDENTIFY THE FEDERAL OR STATE AGENCY TO WHICH CFPB CONSUMER COMPLAINTS WERE REFERRED.
- IDENTIFY OR PUBLISHES LIST OF COMPANIES THAT "REFUSED TO RESPOND" TO CFPB CONSUMER COMPLAINTS.
- ACCEPT DISCRIMINATION COMPLAINTS OF ANY KIND INCLUDING RACE, ETHNIC, GENDER, AGE, OR RELIGION. (Child to any CFPB Types of Child Abuse, Sexual Abuse, Harassment, Discrimination.)
- PREVENT THE COMPANY FROM "WALKING BACK" CLAIMING A NEW COMPLAINT AS A DUPLICATE OF A PREVIOUSLY ADJUDICATED COMPLAINT, even though the consumer includes new supporting evidence to buttress his or her complaint allegations.
- INCLUDE FIELDS DESCRIBING THE TECHNOLOGY OF INCIDENT, INCLUDING LOCATION, DATE AND APPROXIMATE MONETARY VALUE.

4. FROM JANUARY 2013 TO MARCH 2017, AN ASTOUNDING 93.7 % OF ALL COMPANY RESPONSES TO CFPB COMPLAINTS REFERRED FROM FEDERAL AGENCIES WERE DISPUTED BY CONSUMERS BUT THE REFERRING AGENCY WAS NEVER NOTIFIED THAT THESE COMPLAINTS WERE NOT RESOLVED TO THE SATISFACTION OF THE CONSUMER.

5. CFPB INTENTIONALLY MISLED "45,150 CONSUMERS" ABOUT THE EXISTENCE OF AN ACTIONABLE DISPUTE OPTION WITHIN THE CFPB COMPLAINT PROCESS AND FRAUDULENTLY COVERED UP THIS "GROSS MISCONDUCT" BY MISCLASSIFYING THESE 45,150 DISPUTED CFPB COMPLAINTS ARCHIVED IN THE CFPB DATABASE AS "NON-OBSTACULAR CONSUMER FEEDBACK" COMMENTS.

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Date of last Revision:
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Website: World Wide Web Address:
<http://www.standing-up-the-cfpb-complaint-process.com>

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"THE COMPANY" IS THE JUDGE, JURY, AND APPELLATE IN THE CFPB COMPLAINT PROCESS AND CAN ADJUDICATE COMPLAINTS WITHOUT FEAR OF DISPUTES BY CONSUMERS, CFPB, OR OTHER FEDERAL AGENCIES. THE COMPANY'S ARBITRATION RESPONSES ALWAYS RECEIVE CFPB "KISS OF DEATH" APPROVAL, WHICH CARRIES THE WEIGHT OF THE FEDERAL GOVERNMENT. FINALLY, THESE COMPLAINTS ARE "HANDLED TO THE CFPB COMPLAINT BLACKHOLE" FROM WHICH THEY CAN NEVER ESCAPE. (continued)

6. CFPB COMPLAINTS DATABASE DOES NOT INCLUDE GEOGRAPHICAL LOCATION INFORMATION SUCH AS CITY OR METRO AREA, THAT WOULD HELP CFPB DETECT, IDENTIFY, AND IF NECESSARY, REQUEST CRIMINAL INVESTIGATIVE ACTIONS.

7. COMPANY PORTAL ENABLES "THE COMPANY" TO ALERT CFPB OF POSSIBLE FRAUD AND OTHER CRIMINAL ACTIONS BY CONSUMERS BUT DOES NOT ALLOW VULNERABILITY TO THE COMPLAINTS OF "MORTGAGE FRAUD" AND CRIMINAL COMPLAINTS AGAINST COMPANIES. (Example: The CFPB Complaint Process considers 94 Complaint Issues that can be assigned to complaints to help characterize the Complaint in the highest Products category for analytical analysis; however, the Mortgage-related issues do not include include well-known discriminatory crimes such as Mortgage Fraud, Redlining, Racial Profiling, Predatory Lending, and others.)

8. THE DODD FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT CREATED CFPB AS AN AUTONOMOUS FEDERAL AGENCY WITH NO FEDERAL OVERSIGHT AUTHORITY. THIS WAS DONE TO ENSURE THAT CFPB WOULD HAVE THE AUTHORITY TO ACT INDEPENDENTLY, WITHOUT BEING FORCED TO FOLLOW THE RULES, PROCEDURES AND BUREAUCRACY OF ANOTHER FEDERAL GOVERNMENT AGENCY.

THE CFPB CONSUMER COMPLAINT PROCESS: "A BRIDGE TOO FAR"

IN RETROSPECT, THE ESTABLISHMENT OF A NEW, AUTONOMOUS FEDERAL GOVERNMENT AGENCY WITH SUCH BROAD SWEEPING POWERS APPEARED TO BE THE "SILVER BULLET" SOLUTION TO PREVENT A REOCCURRENCE TO THE NEAR CATASTROPHIC MELTDOWN OF THE US ECONOMIC STRUCTURE IN 2007-2009. THE CREATION OF CFPB MAY HAVE BEEN THE MYTHOLOGICAL "BRIDGE TOO FAR" WHILE THE BASIC TECHNOLOGY INFRASTRUCTURE OF CFPB COMPLAINT ARBITRATION IS EXACTLY WHAT IS NEEDED BY THE AMERICAN CONSUMER. THE CURRENT IMPLEMENTATION PLACED TOO MUCH TRUST IN FINANCIAL SERVICES CORPORATIONS AND NATIONAL BANKS WHO ARE MOTIVATED TO INCREASE VALUES TO THEIR SHAREHOLDERS RATHER THAN PLACATE THEIR CUSTOMERS. ADDITIONALLY, OTHER FEDERAL AND STATE CONSUMER PROTECTION AGENCIES WERE MORE THAN HAPPY TO "SHOW THEIR FINANCIALLY-ORIENTED CONSUMER COMPLAINTS OVER-TO-THENCE" TO A GOVERNMENT AGENCY WILLING TO ASSUME THE BURDEN OF THE CONSUMER'S REQUEST FOR A FAIR AND EQUITABLE COMPLAINT ADJUDICATION PROCESS. IN AN IRONIC TWIST, THE FINANCIAL SERVICES COMPANIES AND NATIONAL BANKS WHO WERE THE CFPB WAS TARGETED, NOW WHOLE ALL THE CARDS.

CFPB Complaint Volume
(Monthly Volume for Consumers)

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THE CURRENT CFPB CONSUMER COMPLAINT PROCESS IS THE PERSONIFICATION OF "THE INFAMOUS WIZARD OF OZ COMPLAINT ADJUDICATION PROCESS": THE COMPANY ALWAYS WINS AND THE CFPB TAKES CREDIT FOR A SUCCESSFUL(?) CONSUMER COMPLAINT RESOLUTION BY APPLYING ITS "KISS OF DEATH APPROVAL" RESPONSE TO ALL OF "THE COMPANY'S" 2.2 MILLION CFPB COMPLAINT RESPONSES.

"THE COMPANY"

COMPLAINT

"THE GREAT AND POWERFUL COMPANY" IS THE JUDGE, JURY, AND APPELLATE OF ALL CFPB CONSUMER COMPLAINTS!

COMPLAINT RESPONSE

CFPB Complaints Dam, Archived CFPB Complaints, Complaint Responses, and CFPB Complaints

"FOLLOW THE YELLOW-BRICK COMPANY PORTAL": BETWEEN 2015 AND 2019, MORE THAN ONE MILLION CFPB CONSUMER COMPLAINTS WERE SENT TO THE COMPANY VIA CFPB'S INDIVIDUAL ALL-SEEKING, ALL-KNOWING, COMPANY PORTAL.

WHEN "THE GREAT AND POWERFUL COMPANY" ARBITRATES CFPB COMPLAINTS, IT WINS 85% TO 95% OF ALL COMPLAINTS. THE "SUSPENSION OF CFPB ALWAYS" APPROVED THE COMPANY'S ADJUDICATIONS, OF WHICH THERE IS NO REVIEW OR DISPUTE, AND CANNOT BE REFILED WITH ANY FEDERAL AGENCY.

THE CFPB KISS OF DEATH APPROVAL OF THE COMPANY'S "WIZARD OF OZ COMPLAINT ARBITRATION PROCESS" CARRIES THE ENFORCEMENT AUTHORITY OF THE ENTIRE FEDERAL GOVERNMENT: ALL CONSUMER COMPLAINTS FILED BY THE CFPB ARE CLOSED BY THE COMPANY, WITH THE "CFB KISS OF DEATH APPROVAL" ENSURING THAT CONSUMERS CANNOT DISPUTE THE COMPLAINT, AND CAN NEVER RE-FILE THE SAME COMPLAINT WITH CFPB, OR WITH OTHER FEDERAL CONSUMER PROTECTION AGENCIES, AND CONSUMERS CANNOT DISPUTE "THE COMPANY'S" ARBITRATION RESPONSE WITH THE CFPB OR REQUEST THAT IT BE REFERRED TO ANOTHER FEDERAL, STATE OR LOCAL AGENCY.

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2017 and 2019 "STANDING UP FOR THE YOU" CLAIMS: CFPB.GOV WEBSITE. (Page 13)

March 2017

Standing up for you

We hold companies accountable for illegal practices

\$11.8 billion in relief

29 million+ consumers with improved financial health

We listen to consumers and make their voices heard

1.1 million+ complaints and 94 million+ consumer responses

97% of consumers receive timely responses

June 2019

Standing up for you

We hold companies accountable for illegal practices

\$12.4 billion in relief

31 million+ consumers with improved financial health

We listen to consumers and make their voices heard

1.5 million+ complaints and 97% of consumers receive timely responses

97% of consumers receive timely responses

November 2020

Submitting a complaint helps you

We help consumers connect with financial companies to understand loans, fix errors, and get direct responses about problems. When you submit a complaint we work to get you a response—most companies respond to complaints within 15 days.

THE CFPB COMPLAINT PROCESS WEBSITE INCLUDES THE GREATLY EXAGGERATED (AND UNSUBSTANTIATED) CLAIMS OF "STANDING UP FOR THE AMERICAN CONSUMER."

If the above "Standing up for you" claims were made by a commercial enterprise, it would be in direct violation of the FTC's Truth in Advertising Laws. There is nothing on the CFPB website, or the poorly designed CFPB Complaints Database, which validates these outrageous "Wizard of Oz type" claims. These first two graphics were the center-piece of the www.cfpb.gov website in 2017 and 2019 but were quietly removed when caught proof of these claims was requested by an unnamed consumer. The November 2020 CFPB Website only includes the percentage of "Timely Responses from The Company."

CFPB neglects to mention that in most instances, no response was ever received in the 3% of the non-timely responses; and that the Offending Companies were never represented, fined, or censured. Other federal agencies were never informed about these Offending Companies; and thus, continued to refer financially-related consumer complaints to CFPB; and CFPB continued to send these Offending Companies these complaints. (Example: Mobilgas, I.E.C.)

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THE COMPANY-CENTRIC CFPB CONSUMER COMPLAINT PROCESS.

DISPUTED CFPB MORTGAGE COMPLAINTS

Received From/Company Response	2013	2014	2015	2016	2017	Total	Percent
Challenged with explanation	3	4	2			9	90.90%
Challenged with no explanation	3	5	2			10	10.10%
Total	6	9	4			19	100.00%
Challenged	6	4	15	2		27	1.92%
Challenged with explanation	233	233	338	100	14	728	95.84%
Challenged with no explanation	3	2	2			7	9.48%
Challenged with no explanation	233	231	336	2	1	603	86.36%
Total	251	233	351	104	15	754	100.00%
Challenged	24	3	15	15		57	7.57%
Challenged with explanation	48	48	43	15	28	182	24.14%
Challenged with no explanation	8	22	17	13	1	51	6.72%
Challenged with no explanation	224	267	289	144	26	750	100.00%
Total	251	233	351	104	15	754	100.00%
Challenged	21	10	3	12		46	6.10%
Challenged with explanation	551	569	412	283	20	1835	24.34%
Challenged with no explanation	11	3	3	2		19	2.52%
Challenged with no explanation	572	572	415	285	20	1864	24.86%
Total	583	582	418	287	20	1890	100.00%
Challenged	117	38	82	28	1	266	3.57%
Challenged with explanation	2038	1887	1827	1227	128	7089	96.43%
Challenged with no explanation	28	3	2	2		35	0.47%
Challenged with no explanation	2038	1890	1829	1229	128	7094	96.90%
Total	2066	1900	1831	1231	129	7157	100.00%
Challenged	128	129	203	148	15	423	5.91%
Challenged with explanation	6513	6221	6281	3877	484	23386	32.74%
Challenged with no explanation	129	131	155	151	28	594	8.26%
Challenged with no explanation	6513	6352	6436	4028	512	23841	33.20%
Total	6642	6482	6586	4179	532	24371	100.00%
Total	11184	10917	10663	6669	1159	41391	100.00%

ANALYSIS OF DISPUTED CFPB MORTGAGE COMPLAINTS REFERRED TO CFPB BY OTHER FEDERAL AND STATE AGENCIES.

The Highlighted Statistics of Mortgage-related complaints referred to CFPB; and, The Company's Arbitration Responses were then disputed by Consumer is even more "disingenuous." It is assumed that the complaint screening processes within these agencies ensured that only valid mortgage-related complaints were forwarded to CFPB. However, The Company's 92.2% rejection rates to these referred complaints is an embarrassment to the American consumers who believe they had valid reasons to file these mortgage-related complaints. It is important to note that many, if not most, of the discriminatory-related mortgage complaints received from African Americans, Hispanics, and Latinos were not assigned the proper issue and Sub-Issue by CFPB because CFPB Complaint Process has never filed a racial, ethnic, gender, religious or age discrimination in its nine-plus year history. This added to the fact that CFPB "tied" about the existence of an actionable dispute within the CFPB complaint process borders on criminal negligence because the "CFPB Kins Of Death" of all Company Responses Carries the Weight of the Entire US Government."

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

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THE MARCH 2017 REVISIONIST-HISTORY ACTION OF REDEFINING 145,150 CFPB DISPUTE PROCESSES AS CUSTOMER FEEDBACK RESPONSES.

CFPB'S "ALL-SEEING, ALL-KNOWING 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 CFPB CONSUMER COMPLAINTS IN FAVOR OF THE COMPANY AND NOT THE CONSUMER. THIS WEB-BASED APPLICATION ALSO INCLUDES A "ONE-BUTTON" COMPLAINT RESPONSE APPLICATION THAT SELECTS A) THE APPROPRIATE COMPLAINT CLOSED RESPONSE, AND B) THE OPTIONAL PUBLIC RESPONSE TO BE ADDED TO THE CFPB COMPLAINT DATABASE. THERE ARE NO PUBLIC SPECIFICATIONS DESCRIBING THE OPERATING CHARACTERISTICS OF THE COMPANY PORTAL AND IT IS A CLOSELY GUARDED SECRET. WHAT CONSUMER-RELATED INFORMATION IS PLACED ON THIS WEB-BASED INTERFACE BETWEEN CFPB AND THE COMPANY, THOUGH, IS GUARDED AS "SECRET" NOT SHARED WITH CONSUMERS OR OTHER FEDERAL AGENCIES. THE COMPANY PORTAL IS THE UNDERPINNING OF THE COMPLETE CFPB COMPLAINT PROCESS, AND ITS ARCHITECTURE AND CONCEPTUAL SHOULD BE SHARED WITH ALL CONSUMER THAT ALLEGING COMPLAINTS IN THE CFPB COMPLAINT PROCESS.

ORIGINAL CFPB COMPANY PORTAL DESIGN VERSUS ITS CURRENT IMPLEMENTATION.

The initial conceptual design of the Company Portal was excellent because it provided an electronic, web-based conduit between CFPB and The Company that would eliminate manual activities involving: a) sending complaints from CFPB to The Company, and b) receiving The Company's responses to these complaints. However, the current implementation of this Web-based, "Value-Added" Application exceeds these basic "electronic conduit" requirements and includes enhanced, value-added functionality that exceeds the 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 this company and other companies who filed similar complaints, were adjudicated. It is also a "one-button" option for sending "Closed and/or Public Responses to CFPB." However, the 2015-2017 version of The Company Portal did not include provisions for receiving consumer dispute data, between 2015 and 2017, CFPB chose not to place any of the 145,150 complaint dispute filed by consumers on the "all-seeing, all-knowing" Company Portal.

COMPLAINANTS FILED WITH CFPB: THE COMPANY ALWAYS WINS!

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THE COMPANY-CENTRIC CFPB 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 PERPETRATED UPON THE AMERICAN CONSUMER!" UNFORTUNATELY, THIS FACADE EXTENDS FAR BEYOND THE CFPB ORGANIZATION BECAUSE IT EMPOWERED (AND ENCOURAGED) OTHER FEDERAL CONSUMER COMPLAINT/CONSUMER PROTECTION AGENCIES TO "BLINDLY" REFER CONSUMER COMPLAINTS RECEIVED BY THEIR AGENCY INTO THE CFPB ABYSS, FOR MORE THAN EIGHT YEARS.

"THE CFPB KINS 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 "Kins of Death Approval" to The Company's Complaint arbitration. This "Kins of Death Approval" has the full weight of the Federal Government, and thus, it ensures 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.

CFPB Complaint Validator (Ready to Challenge Consumer)

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

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COMPANY-CENTRIC DESIGN OF THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) COMPLAINT PROCESS, PROTECTS THE COMPANY RATHER THAN "THE CONSUMER"!

THE DESIGN OF THE CFPB COMPLAINT PROCESS THAT ARE BENEFICIAL TO THE COMPANY RATHER THAN THE CONSUMER.

DESCRIPTION OF CFPB COMPLAINT DATABASE DESIGN-CHANGES WHICH WILL ELIMINATE SOME OF THE DESIGN FLAWS IN CURRENT CFPB DATABASE:

- The CFPB Database is a single, monolithic data file that contains all consumer complaints from 2011 through the current date. (Consumer complaints contained in this data file are not segmented and archived on an annual basis, such as is done with the government's EDIDA database.)
- The current CFPB Database with more than two million consumer complaints records, exceeding the Microsoft Excel limitation of 1,048,576 records per Spreadsheet. This makes it impossible for consumers to download this database into one single Excel Spreadsheet. (Complex Excel analysis solutions, such as Data Modeling, can be used to circumvent this spreadsheet limitation, but these techniques are far beyond the technical capabilities of the average consumer.)
- In 2015, the CFPB Database design was modified to accommodate variable length narratives, ranging from a hundred characters or less up to a thousand characters or more. Design flaws with complaint narratives include:
 - There is no published definition of the function and purpose of complaint narrative and the role they play in The Company's complaint adjudication process.
 - The option of including narrative are only available for consumer complaints received via the web; even though, consumer complaints received from other government agencies frequently include complete narratives. Monthly to quarterly.
 - Complaint narratives are currently embedded in the middle of CFPB database records, thus adding unnecessary complexity to traditional database optimization, reorganization, and compacting processes. (Additionally, there is no CFPB directive regarding the role narrative play in The Company's complaint adjudication process.)
- The data upon which an alleged-Complaint occurred should be included in the revised CFPB Complaint Database. (This will allow CFPB and other federal government agencies to determine if a particular complaint is an isolated occurrence or is part of a larger cluster of complaints of the same type.)

COMPLAINANTS FILED WITH CFPB: THE COMPANY ALWAYS WINS!

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COMPANY-CENTRIC DESIGN OF THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) COMPLAINT PROCESS, PROTECTS THE COMPANY RATHER THAN "THE CONSUMER"

DESCRIPTION OF CFPB COMPLAINT DATABASE DESIGN-CHANGES WHICH WILL ELIMINATE SOME OF THE DESIGN FLAWS IN CURRENT CFPB DATABASE (Continued):

5. There is no description of the Company Portal and the role that it plays in the consumer complaint arbitration process. (Additionally, how consumer complaints are forwarded to companies that choose not to install the Company Portal and opt to send Email, fax, postal, or express mail rather than the portal.)
6. There is no description of the type of consumer complaint data that is being placed on the Company Portal and how complaint data placed on the portal helps the company
7. The Company Public Response field is meant to be used in combination with the "Complaint Closed with Explanation" response to provide consumers with information regarding how complaints they are submitting to CFPB have been adjudicated by the company. However, because it is either left blank and/or not publicly-shared "94.34% of the time", its current implementation is "literally and figuratively worthless". Thus, this field should be re-named Company Adjudication Response Explanation, and the current option for The Company to leave this field blank, should be removed.
8. The current CFPB Database only includes a single field for the identification of "Company," when in reality, large financial services companies and National Banks have several, and possibly dozens, of autonomous business units with their own complaint services structure; thus, the recommendation is to add a second optional field that would be used to specify the "business unit" within the parent company shown in the "Company" field.
9. In many instances, State and Zip codes are insufficient to define the geographic location of consumers. A field to accommodate the Metropolitan Statistical Areas (MSA) or Metropolitan Divisions (MD) in which the consumer resides should be added to the CFPB Complaint Database. (FFEC includes a simple utility Geolocation utility that calculates the MSA/MD from any street address, State, and zip code.)



CFPB Complaint Database
(Literally Useless for Consumers)

COMPLAINTS FILED WITH CFPB:
THE COMPANY ALWAYS WINS!

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COMPANY-CENTRIC DESIGN OF THE CONSUMER FINANCIAL PROTECTION BUREAU (CFPB) COMPLAINT PROCESS, PROTECTS THE COMPANY RATHER THAN "THE CONSUMER"

DESCRIPTION OF CFPB COMPLAINT DATABASE DESIGN-CHANGES WHICH WILL ELIMINATE SOME OF THE DESIGN FLAWS IN CURRENT CFPB DATABASE (Continued):

10. The only consumer Demographics included in the CFPB Complaint Database are, a) Older Americans, b) Servicemembers, and c) Older Servicemembers, and there is no evidence whether these TAGS are used by The Company during the adjudication process. Unfortunately, discriminatory complaints comprise a large percentage of all complaints filed via the CFPB Complaint Process, yet there is no way to quantify and analyze this fact because of flaws in the current CFPB complaint database design. Eliminating the current "TAG" field in the CFPB Database and replacing it with demographic categories such as race, ethnicity, age, and gender would provide a wealth of valuable information that could be used by CFPB, other federal and state agencies, and the American consumers.
 11. Currently, more than seventeen percent of all complaints received by CFPB are received from other federal and state agencies; however, the agencies from which these complaints are received is not captured in the CFPB Complaint Database. (A field should be added to the CFPB Database to capture the name of the agency from which these referred complaints are received.)
 12. A significant number of CFPB consumer complaints cannot be resolved within the CFPB Complaint Process, and thus, are referred to other federal (or state) agencies. Currently, the agencies to whom these complaints are referred are not captured in the CFPB Complaint Database.
 13. Adding fields in the CFPB Database to capture the name of these agency to which a consumer complaint is referred, and the date upon which the complaint was referred, would provide immeasurable benefits to consumers, the CFPB and other federal agencies.
 14. The CFPB Complaint Process currently allow The Company to reject duplicate complaints submitted by the same consumer; however, the Company Portal includes the following directions regarding adjudicating duplicate complaints: "If 'duplicate' complaint is not submitted by or on behalf of the same consumer 'that does not describe or include any new facts, testimony, or information'. You must provide the original complaint number with your response."
- The Consumer Complaint Resolution Departments of large financial services companies and national banks frequently declare complaints as duplicates even though the only common information in the new complaint is compared with the previous complaint, is the CFPB form, which is unique by the Complaint Response Department and in which the consumer has no control. Shamefully, duplicates are not logged in the CFPB Complaint Database and thus there is no way how many of these consumer complaints have been incorrectly rejected.



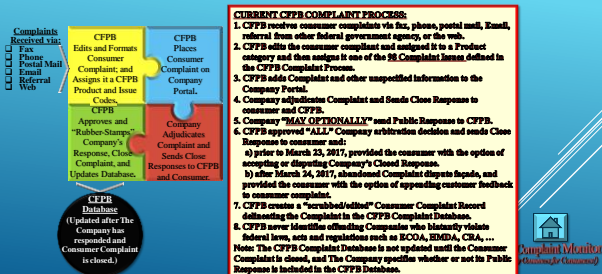
CFPB Complaint Database
(Literally Useless for Consumers)

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"COMPANY-CENTRIC" VERSUS "CONSUMER-CENTRIC" CONSUMER COMPLAINT ADJUDICATION MODELS.

CURRENT "COMPANY-CENTRIC" CFPB CONSUMER COMPLAINT PROCESS.



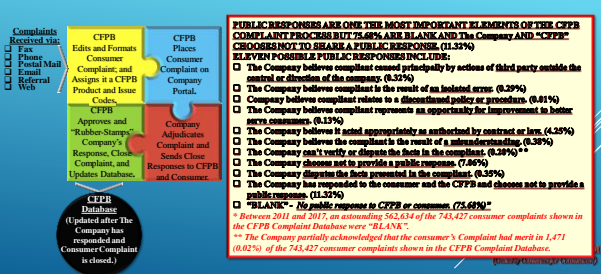
CFPB Complaint Database
(Literally Useless for Consumers)

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"COMPANY-CENTRIC" CONSUMER COMPLAINT ADJUDICATION MODEL.

CURRENT "COMPANY-CENTRIC" CFPB CONSUMER COMPLAINT PROCESS.



CFPB Complaint Database
(Literally Useless for Consumers)

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SAVING THE CFPB COMPLAINT PROCESS.

COMPLAINTS FILED WITH CFPB:
THE COMPANY ALWAYS WINS!



CFPB Complaint Validator
(Really Checks for Cheaters)

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"THE CURRENT CFPB COMPLAINT PROCESS HAS FAILED!"

SINCE ITS CREATION IN DECEMBER 2011, FEDERAL, STATE, AND LOCAL CONSUMER PROTECTION AGENCIES HAVE BEEN "FORCED" TO REFER FINANCIALLY-RELATED CONSUMER COMPLAINTS TO THE COMPANY-CENTRIC CONSUMER FINANCIAL PROTECTION BUREAU (CFPB). DURING THIS PERIOD, CFPB HAS ALLOWED THE VENDOR OF ITS CORE TECHNOLOGY COMPONENTS A) THE COMPANY PORTAL AND B) THE COMPLAINT DATABASE, TO "DICTATE" HOW CONSUMER COMPLAINTS SENT TO CFPB ARE ADJUDICATED.

DURING THIS PERIOD, ALTHOUGH REQUESTED BY CONSUMERS TO INTERVENE ON MANY OCCASIONS, CFPB HAS NOT REVIEWED OR REFERRED ANY CONSUMER COMPLAINT TO ANY OTHER FEDERAL AGENCY. EVEN MORE REPRISABLE, BETWEEN DECEMBER 2011 AND MARCH 25, 2017, CFPB "LEED" TO CONSUMERS ABOUT THE "FREEDOM" OF CFPB COMPLAINT DISPUTE OPTION BY WHICH CONSUMERS COULD "FORMALLY DISPUTE" COMPANY RESPONSES WHICH THEY DID NOT AGREE, AND CONSUMERS DID SO 145,159 TIMES. FINALLY, IN APRIL 2017, WITHOUT NOTIFYING ANY OF THE CONSUMERS WHO WERE LED TO BELIEVE THAT THE COMPANY RESPONSE TO THEIR CFPB COMPLAINT WAS "FORMALLY DISPUTED" BY CFPB, CFPB ARBITRARILY AND CAPRICIOUSLY DECLARED THAT THE 145,159 SO-CALLED DISPUTES RECEIVED FROM CONSUMERS WERE ACTUALLY "CONSUMER FEEDBACK RESPONSES."

CFPB MAY HAVE COMMITTED AN EVEN WORSE TRANSGRESSION TO AMERICAN CONSUMERS AND OTHER FEDERAL AND STATE CONSUMER PROTECTION AGENCIES BY TAKING NO ACTIVE ROLE IN THE ARBITRATION OF ANY OF THE MORE THAN TWO MILLION CONSUMER COMPLAINTS IT RECEIVED FROM CONSUMERS AND CONSUMER PROTECTION AGENCIES. THE FAILURE OF THE CFPB EXPERIMENT CANNOT BE SOLELY ATTRIBUTED TO THE CFPB ORGANIZATION OR THE TECHNOLOGY COMPONENTS UPON WHICH ITS 21ST CENTURY COMPLAINT ADJUDICATION INFRASTRUCTURE WAS BUILT. THE CFPB FAILED BECAUSE THE VERY THING THAT IT DID NOT OFFER CONSUMERS WAS THE ONLY THING THAT CONSUMERS NEEDED, WHICH WAS AN OBJECTIVE, UNBIASED REVIEW OF THEIR COMPLAINTS BASED UPON THE LAWS, ACTS, AND FEDERAL REGULATIONS THAT ALREADY EXISTED.

MANY OF THE COMPANIES TO WHICH CFPB SENDS CONSUMER COMPLAINTS HAVE DEDICATE STAFFS OF CONSUMER COMPLAINT SPECIALIST DEDICATED TO "REJECTING" COMPLAINTS FROM CONSUMERS. IN MANY INSTANCES, THE ACTUAL COMPENSATION RECEIVED BY THESE COMPLAINT SPECIALISTS IS BASED UPON THEIR ABILITY TO RESOLVE CONSUMER COMPLAINTS IN THE COMPANY'S FAVOR. AS THE BYLINES, CONSUMERS ARE GROSSLY OVER-MATCHED, AND WITHOUT THE ASSISTANCE OF AN IMPARTIAL ARBITRATOR SUCH AS CFPB OR ONE OF THE OTHER FEDERAL GOVERNMENT AGENCIES THE CONSUMER WILL ALWAYS LOSE. THE ONLY WAY TO LEVEL THE COMPETITIVE PLAYING FIELD IS TO ACTIVELY INVOLVE OTHER SUBJECT-MATTER EXPERTS IN THE COMPLAINT ADJUDICATION/ARBITRATION PROCESS.

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How the Existing, Company-Centric, CFPB Complaint Process "Really" Works:

1. Consumer files a Complaint with CFPB or some other government agency that refers Complaint to CFPB, but CFPB Reviewer does not ensure that the Complaint is complete, and the proper "Close and Sub-Item" is selected; additionally, the reviewer does not review the Complaint for regulatory issues and/or criminal violations.
2. CFPB sends the consumer Complaint along with supporting documentation to The Company using the "Company Portal".
3. The Company reviews the Complaint and makes an arbitration decision, and then sends one of the following Closed Responses to CFPB via the Company Portal. Closed responses include:
 - I. Closed,
 - II. Closed with Explanation,
 - III. Closed with Monetary Relief, and;
 - IV. Closed without Monetary Relief.
4. The Company can optionally send a public response to CFPB and can specify whether or not the public response can be included in the CFPB Complaint Database.
5. After receiving the Closed Response from The Company, CFPB "holidays rubber-stamp and approve" the Closed Response, closes the Complaint, and updates CFPB Complaint Database(s).
6. The Company communicates its arbitration decision to the consumers via mail and the Complaint is closed by CFPB.

"This real-time, information-sharing activity is accomplished via a CFPB-provided "Company Portal", which inter-connects CFPB and "The Company." The Portal includes an "information dashboard", a popovers of value-added apps, and archived consumer complaints. It also includes a streamlined, "one-button" Complaint Response Generator and a "multiple-choice-type" list of Public Responses, from which The Company can:

- ☐ Select a canned response that is publicly shared,
- ☐ Select a canned response that is only sent to CFPB and is not publicly shared, or;
- ☐ Not select a public response, by leaving the public response field blank.



CFPB Complaint Validator
(Really Checks for Cheaters)

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SUMMARY OF RECOMMENDED CHANGES TO CFPB COMPLAINT PROCESS

FROM THE CONSUMER AND COMPANY PERSPECTIVES, THE CFPB COMPLAINT PROCESS WOULD OPERATE THE SAME AS IT CURRENTLY DOES TODAY, WITH THE EXCEPTION THAT AN ACTIONABLE CONSUMER COMPLAINT DISPUTE PROCESS INVOLVING CFPB AND OTHER FEDERAL GOVERNMENT AGENCIES WOULD BE IMPLEMENTED. IF THE CONSUMER ACCEPTS THE COMPANY RESPONSE, THEN THE 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 IS BE GIVEN AN GIVEN THE OPTION TO "FORMALLY" DISPUTE THE COMPANY'S RESPONSE, INCLUDING THE OPPORTUNITY TO CHARGE A DISPUTE NARRATIVE THAT WOULD BE IMMEDIATELY BE SEIZED WITH "THE COMPANY", AND IT WOULD HAVE AN OPPORTUNITY TO MODIFY IT INITIAL RESPONSE OR REAFFIRMED IT BY ALLOWING IT TO REMAIN THE SAME.
2. IF THE CONSUMER STILL DISPUTES THE COMPANY'S RE-ADJUDICATION OF THE COMPLAINT, CFPB WOULD HAVE THE OPTION OF:
 - ☐ ALLOWING DISPUTED COMPLAINT TO BE REVIEWED BY ITS INTERNAL CFPB ENFORCEMENT UNIT, OR;
 - ☐ REFERRING THE DISPUTED COMPLAINT ALONG WITH THE COMPANY RESPONSE VIA "AN INTER-AGENCY PORTAL" TO ONE OF THE FOLLOWING FEDERAL AGENCIES:
 - ✓ Civil Rights Division,
 - ✓ Housing & Civil Enforcement,
 - ✓ OCC - Consumer Advocate Group,
 - ✓ FTC - Complaint Assistant,
 - ✓ HUD - Office of Fair Housing and Equal Opportunity,
 - ✓ CFPB Enforcement,
 - ☐ FINALLY, THE AGENCY TO WHICH CFPB ROUTED THE REFERRED DISPUTE WOULD RESPOND TO CFPB, WOULD THEN INFORM THE CONSUMER AND THE COMPANY OF THE FINAL RESOLUTION OF THE DISPUTED COMPLAINT.



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CURRENT "COMPANY-CENTRIC" CFPB COMPLAINT DATABASE		
Name of Database Field	Description of Database Field	Example of Database Field and/or Poor Design
Date Received	Dates CFPB Complaint Received	Date (mm/dd/yyyy)
Product	Complaint Product Name	Product such as Mortgage or Payday Loan
Isb-Product	Complaint Sub-Product Name	Yes or No
Issue	Complaint Issue Name	Account Status, Account Terms, Can't Contact Lender,.....
Isb-Issue	Complaint Sub-Issue Name	Link to List of Sub-Products
Consumer Complaint Narrative	Complaint Narrative (only for Web Complaints)	Link to List of Issues and Sub-Issues
Company Public Response	Company Public Response (Optional)	Expanded Sub-Issues, e.g., Consumer Demographics
Company	Parent Company Name	Same as description in Consumer Portal
State	State in which Consumer Complaint Originated	Monetary value of Complaint expressed in dollars
Zip Code	Zip Code in which Consumer Complaint Originated	(Replace public response (no blanks allowed))
Tags	(Demographic) Tags	(Service Member, Older American or Older Service Member)
Consumer Consent Provided?	Consent provided to Publish Complaint in Database	Company Business United Named in CFPB Complaint
Submitted Via	Originator of Consumer Complaint	Mail, Fax, Phone, Email, Referral from Other Agency or Web
Date Sent To Company	Date Consumer Complaint Placed on Company Portal	Date (mm/dd/yyyy)
Company Response To Consumer	Company Closed Response Sent to Consumer	Close, Close w/Explanation, Close with Monetary Relief or Closed with no Monetary Relief
Timely Response?	Was Timely Response Received from Company	Yes or No Answer but no mm/dd/yyyy when response Received
Consumer Disputed?	Did Consumer Dispute Response	Dispute Option discontinued April 2017
Complaint ID	Complaint Identification Number	Complaint ID Different from CFPB Complaint Number

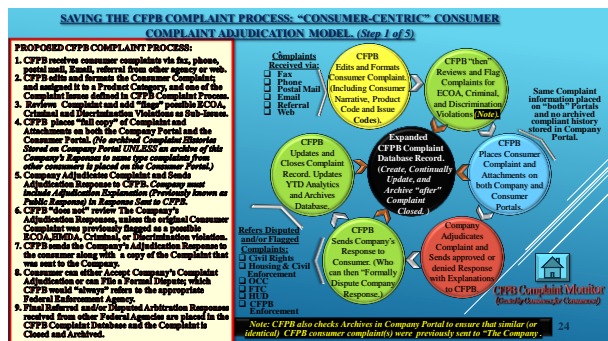
CFPB Complaint Monitor
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PROPOSED "CONSUMER-CENTRIC" CFPB COMPLAINT DATABASE		
NAME OF DATABASE FIELD	DESCRIPTION OF DATABASE FIELD	INFORMATION CONTAINED IN DATABASE FIELD
Year	Complaints: January 1 to December 31	Year (YYYY)
Date reviewed by CFPB	Date 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
ISSUES	Name of Issue	Link to List of Issues and Sub-Issues
SUB-ISSUES	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	Replaces 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
MSA/MD	Company MSA/MD Number	MSA/MD
STATE CODE	Consumer State	State Code
ZIP CODE	Consumer Zip Code	Zip Code
MSA/MD	Consumer MSA/MD	Metropolitan Statistical Area/Metropolitan Division
Racial Category	HMMA-Racial Category/Not Specified	
Ethnicity	HMMA-Ethnic Designation/Not Specified	
Gender	Male/Female/Not Specified	
Age	Age/Not Specified	
CONSUMER CONSENT PROVIDED?	Consumer Consented to Share Complaint?	Yes or No
SUBMITTED VIA	How Complaint Submitted	Email, Fax, Phone, Postal Mail, Referral or Web
Referral from Agency Name	Referring Agency Name	Referring Agency Name (and optional address)
Date Placed on Company Portal	Date Complaint Placed on Company Portal	Date (mm/dd/yyyy)
COMPANY RESPONSE TO CONSUMER		
Date Company Response Received	Response From Company	Date (mm/dd/yyyy)
Final Disposition of Complaint	Final Disposition of CFPB Complaint	Is 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 Agency	Date Complaint referred to other agency	Date (mm/dd/yyyy)
Complaint ID	Complaint Identification Number	Complaint number assigned when Complaint created

CFPB Complaint Monitor
(Ready to Change the Game)

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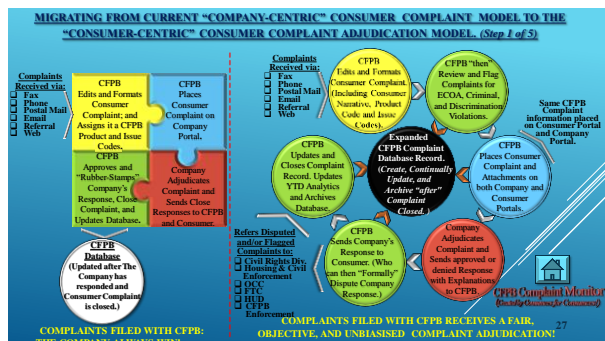
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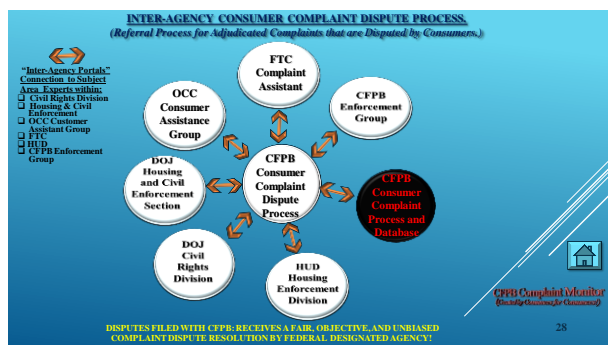
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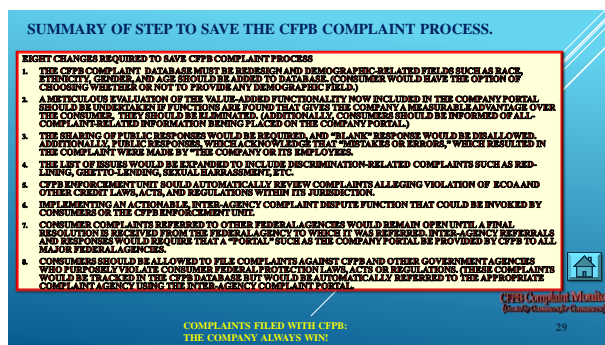
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