

DEBT COLLECTORS

CFPB Data Reveal Consumer
Complaints by Company

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Executive Summary

Created in the wake of the 2008 financial crisis, the Consumer Financial Protection Bureau, or CFPB, has been a critical ally for consumers in the financial marketplace. Over its history the CFPB has secured \$12 billion in relief for wronged consumers, provided recourse to consumers facing problems with financial companies, and taken action against companies that break the law.

The Trump administration, however, has worked to undermine the effectiveness of the CFPB, retreating from critical investigative work and seeking to slash the CFPB's budget and limit its ability to protect consumers. The CFPB has also reduced the usefulness of its research on consumer financial complaints. Its latest such report, spotlighting debt collection complaints, does not include the names of companies that receive the most complaints for abusive debt collection practices.

An analysis of CFPB consumer complaint data fills in the gaps of the bureau's report, telling the story the Trump administration won't about the problems consumers face with debt collection agencies across America.

Encore Capital Group is the most complained-about debt collection company.

- Among complaints published in the CFPB's Consumer Complaint Database as of April 2018, the companies that have received the

most debt collection complaints are Encore Capital Group, Portfolio Recovery Associates, ERC, Citibank, and Synchrony Financial.

- The top 10 companies for debt collection complaints account for more than a fifth of all such complaints. Four of these companies – Encore Capital Group, Portfolio Recovery Associates, Citibank and Transworld – have been the subject of CFPB enforcement actions for deceptive or illegal debt collection activities.¹

Georgia leads all states in debt collection complaints per capita.

- The states with the most debt collection complaints per capita are Georgia, Delaware, Florida, Nevada and Maryland. Washington, D.C., has more complaints per capita than any state, possibly due to local familiarity with the CFPB.
- Encore Capital Group, the nation's most complained-about debt collection company, is also the most complained-about company in 32 states and Washington, D.C. Portfolio Recovery Associates is the most complained-about company in four states.

With a Senate-confirmed consumer champion at its helm, the CFPB can be a powerful ally for American consumers, giving consumers recourse when they are

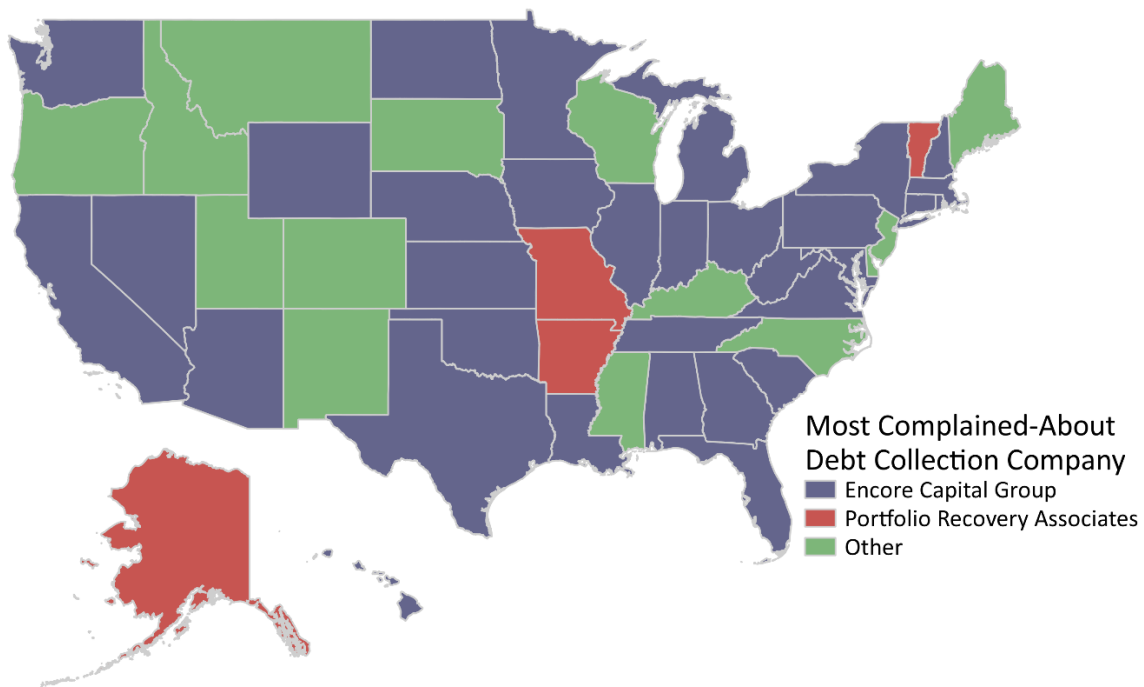
wronged and helping to create a fair marketplace for financial services.

Under the Trump administration, the CFPB's future has been put at risk, and its ongoing efforts to protect consumers have been severely hampered. To ensure American consumers are protected in the financial marketplace, the president should swiftly nominate a consumer champion to the director position of the CFPB. Policymakers should oppose attempts to defund or defang the CFPB, even if recommended by its acting director.

To fulfill its mission of protecting consumers, the CFPB should:

- Reinstate all delayed or terminated rulemakings, investigations and enforcement actions.
- Complete a strong debt collection rule improving protections for consumers.
- Maintain public access to a vibrant, transparent and complete consumer complaint database that encourages consumers, competitors, academics, other researchers and the complained-about companies themselves to study ways to make the marketplace work better.
- Resume monthly publication of consumer complaint analyses and include data on complaints by company.

Figure ES-1. Encore Capital Is the Most Complained-About Company in 32 States



Introduction: The CFPB At Risk

The 2008 Wall Street meltdown was partly caused by, and helped to expose, the enormous risks and mistreatment that consumers faced in the financial marketplace. In the years leading up to the meltdown, consumers facing problems with financial companies – including banks, mortgage companies, payday lenders, and debt collection firms – lacked a dedicated ally at the federal level to turn to for protection against illegal or predatory behavior.

That all changed in 2011 with the opening of the Consumer Financial Protection Bureau, or CFPB. The CFPB, the first federal agency dedicated to protecting consumers in the financial marketplace, immediately got to work enforcing the law, returning money to wronged consumers, and creating common-sense financial protection rules. By the end of 2016, the CFPB had already secured \$12 billion in relief for wronged consumers.² The CFPB's Consumer Complaint Database enabled the bureau to spot patterns in emerging consumer threats and allowed citizens and watchdog groups to highlight the places in the country with the most complaints and the companies that were the subject of the most concern.

Today, however, the Trump administration is failing to uphold the CFPB's mission. Mick Mulvaney, as the CFPB's acting director, has moved to slash the CFPB's budget, dramatically limit its effectiveness protecting consumers, and put its future funding at the mercy of congressional

appropriations.³ The CFPB has also scaled back or halted investigations into financial wrongdoing – including, according to reports, limiting its probe into the failure of Equifax to protect its customer data that resulted in the one of the largest and most serious consumer data breaches in history.⁴

The Trump administration's CFPB is also failing to inform consumers about threats in the financial marketplace by making its own monthly consumer complaint reports more sporadic and reducing the amount of information in the reports. Those reports, which the CFPB had issued on a monthly basis since 2015, had not been published since October 2017. The CFPB's first report since then – a report on debt collection complaints issued on 31 May 2018 – is missing key information of value to consumers and policy-makers (and concern that research publication will not resume on a monthly basis may be bolstered by the report's name change from *Monthly Complaint Report* to *Complaint Snapshot*.) This comes even as the Mulvaney-led CFPB has put consumers at added risk to predatory debt collection by scaling back payday lending protections. (See page 9.)

The analysis in this report provides information the Trump administration chose not to provide in its most recent report: the names of the companies that receive the most complaints for abusive debt collection practices across the country and in each of the states. (See Methodology for details.)

Consumers deserve to be protected against unfair treatment and predatory behavior in the financial marketplace. The CFPB can provide just such protection – but to do so, it needs a director dedicated to fighting for consumers.

Predatory and Illegal Debt Collection Practices

Harm Consumers

Debt collection is a big business, affecting 70 million consumers and consisting of at least 6,000 debt collection firms.⁵ Although some debt collection companies are reputable, others employ deceptive, predatory or illegal tactics. These include targeting consumers that do not owe debt; making threats of arrest or even bodily harm; harassing consumers with incessant calls; posing as someone else, including as police or lawyers; and filing lawsuits against consumers whose debts are not verifiable or enforceable.⁶

These aggressive tactics can result not just in stress or disruption for consumers, but also in consumers paying debts that they do not owe as a result of confusion or

pressure.⁷ Consumers also may spend time and money disputing debts or defending against legal action.⁸

The CFPB has taken extensive action to protect consumers against unfair treatment by debt collection companies.⁹ The CFPB has halted deceptive and predatory debt collection behavior and forced companies to refund money to consumers. The bureau has proposed rules to protect consumers against abuse and from contact over debts that are not theirs. And it has received almost 400,000 debt collection complaints, using those complaints to uncover emerging threats in the marketplace and to help guide the agency's actions.¹⁰

By Scaling Back Payday Lending Protections, The Trump Administration Is Putting Consumers at Risk of Exposure to Predatory Collection Practices

Acting Director of the CFPB Mick Mulvaney has indicated that, under his direction, the bureau's enforcement division may prioritize debt collection.¹¹ However, Mulvaney has already directed the CFPB to take actions that create new risk of harmful payday lending practices – actions that could ultimately result in more exposure to predatory debt collection. Under Mulvaney, the CFPB has:

- Started the process of revising or killing a previously proposed rule to ensure that payday lenders vet whether borrowers can repay their loans.¹² The proposed rule would also curtail lenders' ability to make repeated attempts to debit payments directly from borrowers' bank accounts, which can result in bank fees and lead to account closure.¹³
- Dropped its lawsuit against four online lenders that it had accused of deceiving consumers by collecting debts not legally owed, for loans with interest rates as high as 950 percent.¹⁴ In originally announcing its lawsuit, then-CFPB Director Richard Cordray said, "[w]e allege that these companies made deceptive demands and illegally took money from people's bank accounts. We are seeking to stop these violations and get relief for consumers."

By creating more opportunity for deceptive and predatory lending practices, these actions will put consumers at increased risk of racking up debt – and more risk of contact with debt collectors and predatory collection practices.

Consumer Complaints Reveal Debt Collection Problems by Company and State

Beginning in 2015, the CFPB published a *Monthly Complaint Report* to provide a “high-level snapshot of trends in consumer complaints.”¹⁵ Through April 2017, these reports included data on companies that received the most complaints.

Over the last year, these reports have been published less frequently, and have included more limited information. From April 2017 through October 2017, reports were no longer published on a consistent monthly basis, and no longer included company data.¹⁶ After October 2017, publication of monthly reports was halted altogether. The CFPB’s first report since then – a report issued on 31 May 2018 highlighting debt collection complaints – also fails to include analysis of complaints by company. To tell this missing story, this report provides a more detailed look at data reported in the CFPB’s public Consumer Complaint Database. (See Methodology for details.)

Encore Capital Group Is America’s Most Complained-About Debt Collection Company

Among complaints published in the CFPB’s Consumer Complaint Database as of April 2018, the companies that have received the most debt collection complaints are Encore Capital Group, Portfolio Recovery Associates, ERC, Citibank, and Synchrony Financial.

The top 10 companies for debt collection complaints account for more than a fifth of all such complaints. Four of these companies have been the subject of CFPB enforcement actions for illegal debt collection activities:

- **Encore Capital Group and Portfolio Recovery Associates** were both penalized by the CFPB for using deceptive tactics to collect bad debt. The CFPB found that the companies purchased debt that was “potentially inaccurate, lacking documentation, or unenforceable,” and then “collected payments by pressuring consumers with false statements and churning out lawsuits using robo-signed court documents.”¹⁷ The CFPB ordered the companies to pay a combined \$61 million in consumer refunds.¹⁸
- **Citibank** was penalized by the CFPB for deceptive collection practices. When calling customers to collect on delinquent debt, Citibank offered consumers the option to pay debts by using a checking account to post to the account on the same day – a transaction that included a \$14.95 fee. Citibank failed to explain the purpose of the fee and failed to disclose free payment alternatives, despite the fact that, according to the CFPB, “it was rarely in the

consumer's interest to pay the fee so that the payment would post on the same day." For this and other illegal practices, Citibank was required to pay \$700 million in consumer relief.¹⁹

- **Transworld** was penalized by the CFPB for illegal debt collection

litigation practices.²⁰ Transworld filed false or misleading legal documents while suing students for loan debt that was either unproven, or that was too old to be recovered via lawsuit. Transworld was ordered to pay a \$2.5 million civil penalty.

Table 1. The 10 Companies That Have Received the Most Debt Collection Complaints

Company	Complaints	Percent of All Debt Collection Complaints
Encore Capital Group	8,842	4.6%
Portfolio Recovery Associates	6,827	3.6%
ERC	4,979	2.6%
Citibank	3,409	1.8%
Synchrony Financial	3,086	1.6%
Convergent Resources	3,021	1.6%
Capital One	3,017	1.6%
Transworld Systems	2,842	1.5%
Diversified Consultants	2,773	1.5%
Resurgent Capital Services	2,617	1.4%
Total (Top 10)	41,413	21.7%

Georgia Leads all States in Debt Collection Complaints per Capita

Among complaints published in the CFPB's Consumer Complaint Database as of April 2018, the states with the most debt collection complaints per capita are Georgia, Delaware, Florida, Nevada and Maryland. Washington, D.C., ranks first in

complaints per capita, possibly due to consumer familiarity with the CFPB.

Encore Capital Group, the company that received the most debt collection complaints in the country, also received the most debt collection complaints in 32 states and Washington, D.C. Portfolio Recovery Associates received the most debt collection complaints in four states.

Figure 1. Debt Collection Complaints by State per 10,000 Residents

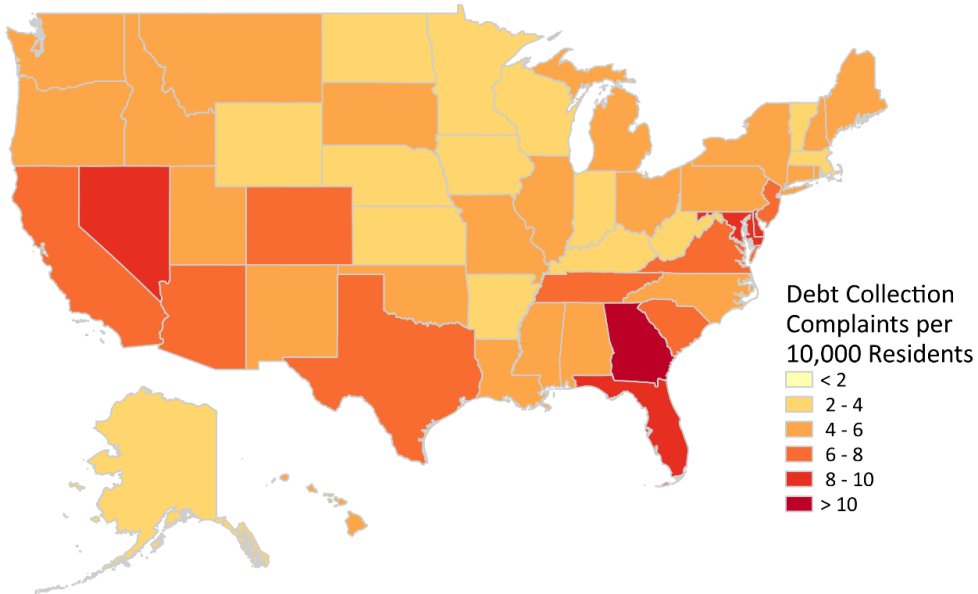


Figure 2. Encore Capital Is the Most Complained-About Company in 32 States

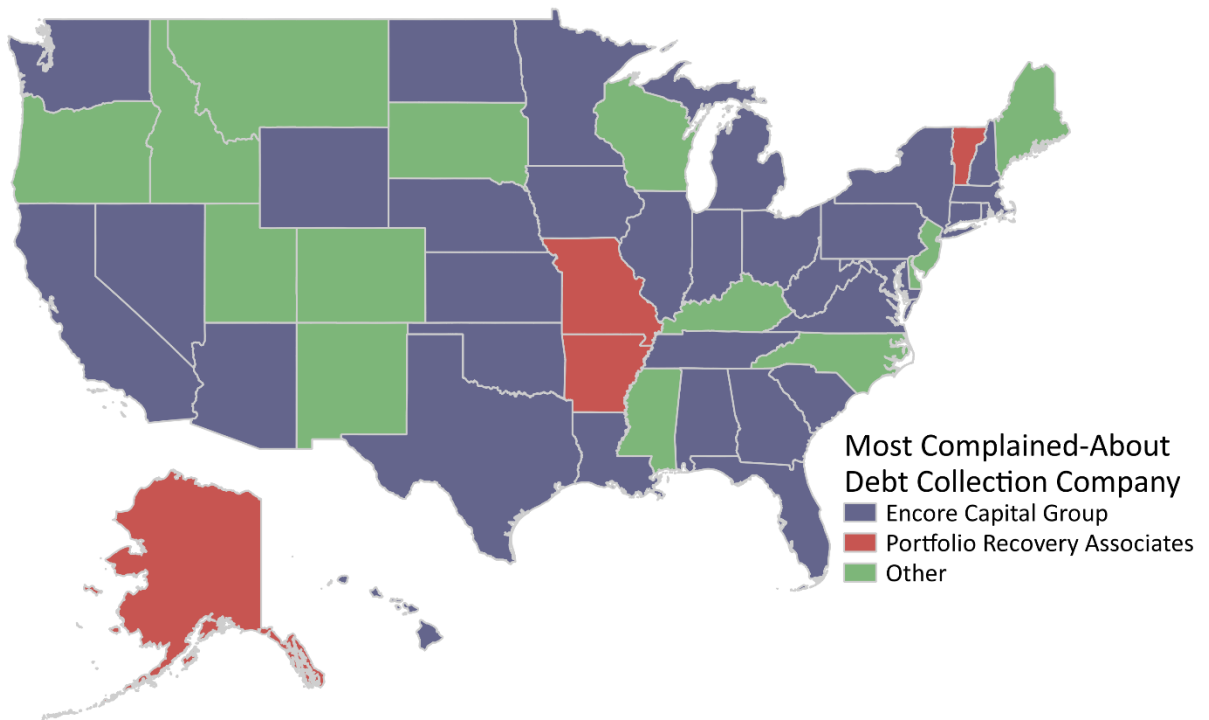


Table 2. Debt Collection Complaints by State as of April 2018

State	Total Number of Debt Collection Complaints	Complaints per 10,000 Residents	Rank of Complaints per Capita	Most Complained-About Company (Complaints)
Alabama	2,451	5.1	22	Encore Capital Group (122)
Alaska	241	3.4	47	Portfolio Recovery Associates (17)
Arizona	4,522	7.1	8	Encore Capital Group (217)
Arkansas	993	3.4	46	Portfolio Recovery Associates (51)
California	24,678	6.6	12	Encore Capital Group (1195)
Colorado	3,207	6.4	13	Wakefield & Associates (147)
Connecticut	1,620	4.5	31	Encore Capital Group (104)
Delaware	894	10.0	3	BYL Collection Services (51)
District of Columbia	890	14.8	1	Encore Capital Group (38)
Florida	18,462	9.8	4	Encore Capital Group (1017)
Georgia	9,763	10.1	2	Encore Capital Group (442)
Hawaii	657	4.8	24	Encore Capital Group (28)
Idaho	738	4.7	28	Alorica (30)
Illinois	6,666	5.2	21	Encore Capital Group (321)
Indiana	2,508	3.9	40	Encore Capital Group (100)
Iowa	930	3.1	50	Encore Capital Group (50)
Kansas	1,147	3.9	38	Encore Capital Group (58)

State	Total Number of Debt Collection Complaints	Complaints per 10,000 Residents	Rank of Complaints per Capita	Most Complained-About Company (Complaints)
Kentucky	1,703	3.9	39	GLA Collection Company (125)
Louisiana	2,625	5.8	15	Encore Capital Group (110)
Maine	552	4.2	35	The Thomas Agency (52)
Maryland	4,800	8.3	6	Encore Capital Group (226)
Massachusetts	2,337	3.6	43	Encore Capital Group (139)
Michigan	4,428	4.5	32	Encore Capital Group (265)
Minnesota	1,872	3.5	45	Encore Capital Group (89)
Mississippi	1,195	4.0	37	Franklin Collection Service (42)
Missouri	2,903	4.8	23	Portfolio Recovery Associates (117)
Montana	410	4.1	36	Collection Bureau Services (23)
Nebraska	701	3.8	41	Encore Capital Group (30)
Nevada	2,597	9.6	5	Encore Capital Group (86)
New Hampshire	589	4.5	33	Encore Capital Group (29)
New Jersey	6,081	6.9	9	Pressler & Pressler (322)
New Mexico	982	4.8	26	Tormey Bewley Corporation (50)
New York	10,653	5.5	18	Encore Capital Group (507)
North Carolina	5,184	5.4	19	Optimum Outcomes (161)

State	Total Number of Debt Collection Complaints	Complaints per 10,000 Residents	Rank of Complaints per Capita	Most Complained-About Company (Complaints)
North Dakota	226	3.4	48	Encore Capital Group (10)
Ohio	6,204	5.4	20	Encore Capital Group (258)
Oklahoma	1,707	4.6	30	Encore Capital Group (76)
Oregon	2,149	5.6	17	Ray Klein, Inc. (98)
Pennsylvania	5,995	4.7	27	Encore Capital Group (344)
Rhode Island	508	4.8	25	Encore Capital Group (39)
South Carolina	3,177	6.9	10	Encore Capital Group (122)
South Dakota	353	4.3	34	Credico (40)
Tennessee	3,884	6.1	14	Encore Capital Group (161)
Texas	20,051	8.0	7	Encore Capital Group (889)
Utah	1,260	4.6	29	Express Recovery Services (66)
Vermont	195	3.1	49	Portfolio Recovery Associates (14)
Virginia	5,315	6.6	11	Encore Capital Group (248)
Washington	3,835	5.7	16	Encore Capital Group (165)
West Virginia	468	2.5	51	Encore Capital Group (26)
Wisconsin	2,023	3.6	44	Americollect (111)
Wyoming	206	3.7	42	Encore Capital Group (13)

Conclusion: Americans Deserve a Consumer Champion

Directing the CFPB

Consumers should be able to save, invest and manage their money without fear of being trapped, tricked or ripped off by the institutions they trust with their future. They should also be free from abusive contact by debt collection companies and should never be contacted about debt that isn't theirs.

But, as has been shown time and again, consumer interactions with financial companies are often rife with problems. Abusive, predatory or negligent behavior by companies like Equifax and Wells Fargo, along with many of America's biggest debt collection companies, shows that consumers need strong protections in the financial marketplace – and that means a strong Consumer Financial Protection Bureau.

With a Senate-confirmed consumer champion at its helm, the CFPB can be a powerful ally for American consumers, giving consumers recourse when they are wronged and helping to create a fair marketplace for financial services.

Under the Trump administration, the CFPB's future has been put at risk, and its ongoing efforts to protect consumers have been severely hampered. To ensure American consumers are protected in the financial marketplace, the president should swiftly nominate a consumer champion to the director position of the CFPB. Policymakers should oppose attempts to

defund or defang the CFPB, even if recommended by its acting director.

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- Resume monthly publication of consumer complaint analyses and include data on complaints by company.

Methodology

CFPB consumer complaint data were downloaded from <https://www.consumerfinance.gov/data-research/consumer-complaints> on 2 April 2018.²¹ Complaints were downloaded in bulk as a comma separated value (CSV) file, and totaled by state and company using Microsoft Access.

This analysis reflects only those complaints published in the CFPB's online Consumer Complaint Database. As a result, complaint totals and breakdowns are slightly different from the CFPB's own complaint research, which is based on total complaints received, rather than just those complaints that are published. Published complaint data exclude certain complaints, including in cases where the CFPB cannot establish a commercial relationship between the consumer and company in question, or where the CFPB refers complaints to a separate agency.

Notes

¹ Encore Capital Group and Portfolio Recovery Associates: Consumer Financial Protection Bureau, *CFPB Takes Action Against the Two Largest Debt Buyers for Using Deceptive Tactics to Collect Bad Debts*, 9 September 2015, archived at <http://web.archive.org/web/20180405103809/https://www.consumerfinance.gov/about-us/newsroom/cfpb-takes-action-against-the-two-largest-debt-buyers-for-using-deceptive-tactics-to-collect-bad-debts/>; Citibank: Consumer Financial Protection Bureau, *CFPB Orders Citibank to Pay \$700 Million in Consumer Relief for Illegal Credit Card Practices*, 21 July 2015, archived at <http://web.archive.org/web/20180305042053/https://www.consumerfinance.gov/about-us/newsroom/cfpb-orders-citibank-to-pay-700-million-in-consumer-relief-for-illegal-credit-card-practices>; Transworld: Consumer Financial Protection Bureau, *CFPB Takes Action Against National Collegiate Student Loan Trusts, Transworld Systems for Illegal Student Loan Debt Collection Lawsuits*, 18 September 2017, archived at <http://web.archive.org/web/20180329112110/https://www.consumerfinance.gov/about-us/newsroom/cfpb-takes-action-against-national-collegiate-student-loan-trusts-transworld-systems-illegal-student-loan-debt-collection-lawsuits>.

² Consumer Financial Protection Bureau, *Consumer Financial Protection Bureau: By the Numbers*, December 2016, archived at http://web.archive.org/web/20180104011754/http://files.consumerfinance.gov/f/documents/201701_cfpb_CFPB-By-the-Numbers-Factsheet.pdf.

³ Alan Rappeport, "Mick Mulvaney, Consumer Bureau's Chief, Urges Congress to Cripple Agency," *New York Times*, 2 April 2018.

⁴ Patrick Rucker, "Exclusive: U.S. Consumer Protection Official Puts Equifax Probe on Ice – Sources," *Reuters*, 5 February 2018.

⁵ Consumer Financial Protection Bureau, *CFPB Survey Finds Over One-In-Four Consumers Contacted By Debt Collectors Feel Threatened*, 12 January 2017, archived at <http://web.archive.org/web/20180305013117/https://www.consumerfinance.gov/about-us/newsroom/cfpb-survey-finds-over-one-four-consumers-contacted-debt-collectors-feel-threatened>.

⁶ Posing as doctors: Jessica Silver-Greenberg, "Debt Collector Is Faulted for Tough Tactics in Hospitals," *The New York Times*, 24 April 2012; posing as lawyers and police: Mitch Lipka, "5 Illegal Tactics Shady Debt Collectors Love," *CBS News*, 27 February 2015; threats: Mitch Lipka, "5 Illegal Tactics Shady Debt Collectors Love," *CBS News*, 27 February 2015; lawsuits: CFPB, *CFPB Takes Action Against the Two Largest Debt Buyers for Using Deceptive Tactics to Collect Bad Debts* (press release), archived at web.archive.org/web/20170303195210/https://www.consumerfinance.gov/about-us/newsroom/cfpb-takes-action-against-the-two-largest-debt-buyers-for-using-deceptive-tactics-to-collect-bad-debts/; debt not owed: Consumer Financial Protection Bureau, *Consumers Report Being Hounded About Debts Not Owed*, 20 March 2014, archived at <http://web.archive.org/web/20180305003445/https://www.consumerfinance.gov/about-us/newsroom/consumers-report-being-hounded-about-debts-not-owed>.

⁷ Consumer Financial Protection Bureau, *Consumer Financial Protection Bureau Considers Proposal to Overhaul Debt Collection Market* (press release), archived at web.archive.org/web/20170303195501/https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-considers-proposal-overhaul-debt-collection-market.

⁸ *Ibid.*

⁹ See note 5.

¹⁰ See note 7.

¹¹ “U.S. Consumer Watchdog Signals Debt Collection Rules to Come,” *Reuters*, 23 January 2018.

¹² Julia Horowitz, “CFPB Says It Will Reconsider Its Rule on Payday Lending,” *CNN Money*, 16 January 2018.

¹³ Consumer Financial Protection Bureau, *CFPB Finalizes Rule to Stop Payday Debt Traps*, 5 October 2017, archived at <http://web.archive.org/web/20180404070745/https://www.consumerfinance.gov/about-us/newsroom/cfpb-finalizes-rule-stop-payday-debt-traps>.

¹⁴ Zeke Faux, “CFPB Signals Shift by Dropping Payday Lender Lawsuit,” *Bloomberg*, 18 January 2018.

¹⁵ Consumer Financial Protection Bureau, *Monthly Complaint Report, Vol. 19*, available at <https://www.consumerfinance.gov/data-research/research-reports/monthly-complaint-report-vol-19>, 8 February 2017.

¹⁶ Consumer Financial Protection Bureau, *Research & Reports*, accessed at <https://www.consumerfinance.gov/data-research/research-reports> on 4 April 2018.

¹⁷ Consumer Financial Protection Bureau, *CFPB Takes Action Against the Two Largest Debt Buyers for Using Deceptive Tactics to Collect Bad Debts*, 9 September 2015, www.consumerfinance.gov/about-us/newsroom/cfpb-takes-action-against-the-two-largest-debt-buyers-for-using-deceptive-tactics-to-collect-bad-debts.

¹⁸ *Ibid.*

¹⁹ Consumer Financial Protection Bureau, *CFPB Orders Citibank to Pay \$700 Million in Consumer Relief for Illegal Credit Card Practices*, 21 July 2015, archived at <http://web.archive.org/web/20180305042053/https://www.consumerfinance.gov/about-us/newsroom/cfpb-orders-citibank-to-pay-700-million-in-consumer-relief-for-illegal-credit-card-practices>.

²⁰ Consumer Financial Protection Bureau, *CFPB Takes Action Against National Collegiate Student Loan Trusts, Transworld Systems for Illegal Student Loan Debt Collection Lawsuits*, 18 September 2017, archived at <http://web.archive.org/web/20180329112110/https://www.consumerfinance.gov/about-us/newsroom/cfpb-takes-action-against-national-collegiate-student-loan-trusts-transworld-systems-illegal-student-loan-debt-collection-lawsuits>.

²¹ Consumer Financial Protection Bureau, *Consumer Complaint Database*, downloaded from <https://www.consumerfinance.gov/data-research/consumer-complaints> on 2 April 2018.