

CFPB Political Appointee Tom Pahl Worked To Make It Easier For Debt Collectors To Harass Consumers After Advocating For The Industry Throughout His Career—Benefitting Debt Collectors Who Have Spent Millions Lobbying The Trump Administration

Deputy CFPB Director Tom Pahl Was The CFPB's Policy Associate Director For Research, Markets, And Regulations, A Political Position Created By Then-Director Mick Mulvaney As He Prioritized Loosening Regulations On Debt Collection.

Deputy CFPB Director Tom Pahl Is The CFPB's Former Policy Associate Director For Research, Markets, And Regulations, A Political Position Created By Then-Director Mick Mulvaney.

Thomas Pahl's Position As Policy Associate Director for Research, Markets & Regulations "Is A Political Post" Created By Then-Acting Director Mick Mulvaney. "Tom Pahl has had the opportunity to make the regulatory rounds in recent years, uniquely preparing him for this moment. On Monday he returns to the Consumer Financial Protection Bureau (CFPB) as Policy Associate Director for Research, Markets & Regulations (RMR). He will report directly to Acting Director Mick Mulvaney. [...] Unlike Pahl's previous CFPB job as a career staffer, this latest job is a political post. In most federal agencies the top person, a political appointee, has a handful of positions available to bring in his or her own senior team. The Federal Trade Commission, for example, has nine such slots. The CFPB had none. Acting Director Mulvaney has created such positions and has hired individuals for those roles." [Stephanie Eidelman, "[Tom Pahl Returns to CFPB, Will Oversee Debt Collection Rulemaking at Critical Juncture](#)," *insideARM*, 04/19/18]

In July 2020, Thomas Pahl Was Named Deputy CFPB Director. "Consumer Financial Protection Bureau Director Kathleen L. Kraninger today announced that Thomas Pahl will serve as the Deputy Director of the Bureau. Pahl has served as Policy Associate Director for Research, Markets, and Regulations since April 2018. Previously, Pahl was the Acting Director of the Bureau of Consumer Protection at the Federal Trade Commission." [Press Release, [07/20/20](#)]

Pahl Was Likely Brought On By Then-Acting CFPB Director Mick Mulvaney Because Of His Debt Collection Rulemaking Experience; Now-Deputy Director Brian Johnson May Have Recommended Him For His Current Position.

Tom Pahl Was Likely Brought On By Mulvaney Because Of His Experience In The Federal Trade Commission's Debt Collection Rulemaking. "Acting Director Mulvaney has said he views debt collection rulemaking as a priority. Given Pahl's many years of deep experience in this arena, we could expect him to be up to speed extremely quickly and help to make this priority a reality." [Stephanie Eidelman, "[Tom Pahl Returns to CFPB, Will Oversee Debt Collection Rulemaking at Critical Juncture](#)," *insideARM*, 04/19/18]

On March 16, 2018, Then-Principal Policy Director Brian Johnson Told Other Senior

CFPB Officials That He'd Like To "Bring In A Candidate" For "An RMR PD Interview." On March 16, 2018 Brian Johnson emailed Kirsten Sutton Mork and Emma Doyle to request "an RMR PD interview," saying "I'd like to bring in a candidate, per my conversation earlier this week." [Email from Brian Johnson to Kirsten Sutton Mork and Emma Doyle, 03/16/18 ([FOIA #CFPB-2018-517-F](#), p. 1023)]

Just Over A Month Later, It Was Reported That The CFPB Would Be Hiring Thomas Pahl As Policy Associate Director For Research, Markets, And Regulations, Reporting Directly To Then-Acting Director Mick Mulvaney. On April 19, 2018, it was reported that the CFPB would be bringing in Thomas Pahl "as Policy Associate Director for Research, Markets & Regulations (RMR)" and would be "report[ing] directly to Acting Director Mick Mulvaney." [Stephanie Eidelman, "[Tom Pahl Returns to CFPB, Will Oversee Debt Collection Rulemaking at Critical Juncture](#)," *insideARM*, 04/19/18]

- **CFPB's Research, Markets And Regulations Policy Associate Director Is "Responsible For Monitoring Consumer Financial Markets, Conducting Research, And Writing Rules."** [[Research, Markets & Regulations](#)," Consumer Financial Protection Bureau, accessed 05/13/19]

Thomas Pahl Was Poised To Be Displaced At The FTC At The Time. "In February 2017 Acting Federal Trade Commission Chairman Maureen Ohlhausen, a Trump appointee and advocate of 'regulatory humility,' named Pahl Acting Director FTC Bureau of Consumer Protection. Earlier this year, President Trump announced that he had nominated Ohlhausen to be a judge on the United States Court of Federal Claims, which meant that Pahl would likely be replaced by someone chosen by an incoming FTC Chairman." [Stephanie Eidelman, "[Tom Pahl Returns to CFPB, Will Oversee Debt Collection Rulemaking at Critical Juncture](#)," *InsideARM*, 04/19/18]

The CFPB Has Proposed A New Rule That Would Allow Debt Collectors To Send Consumers An Unlimited Number Of Texts And Emails.

The CFPB's Proposed Rule Would Allow Debt Collectors To "Send Consumers Unlimited Amounts Of Texts And Emails."

In May 2019, The CFPB Issued Its Proposed Debt Collection Rule That Would Allow Debt Collectors To "Send Consumers Unlimited Amounts Of Texts And Emails." "The Consumer Financial Protection Bureau [...] proposed rules that would give the industry the go-ahead to send consumers unlimited amounts of texts and emails, accelerating a trend the watchdog bureau says could be beneficial for everyone." [Renaë Merle, "[Trump administration wants to allow debt collectors to call 7 times a week and text, email as much as they want](#)," *The Washington Post*, 05/07/19]

- **Under The Proposed Rule, Consumers Would Be Required To Actively “Unsubscribe” From Digital Communications.** “It regulates how debt collectors may use voicemails, emails and text messages to communicate with consumers. Notably, the Proposed Rulemaking would permit consumers to ‘unsubscribe’ from future communications through these methods. Under the Proposed Rulemaking, consumers could limit the ways debt collectors contact them, e.g., while at work.” [Thomas H. Wagner, “[The CFPB’s Long Awaited Debt Collection Rule is Certain to Shake Up the Industry](#),” *The National Law Review*, 05/20/19]

Public Comments On The Proposed Debt Collection Rule Are Due Monday, August 19, 2019. [[“CFPB to Open Comment Period on Proposed Debt Collection Rule,”](#) *ACA International*, 05/20/19]

The Rule Would Limit Phone Calls From Debt Collectors To No More Than Seven Times Per Week Per Debt—Which Could Actually Result In Consumers Getting “Dozens Of Calls Each Week” From Debt Collectors.

The CFPB’s Proposed Rule Would Limit Phone Calls From Debt Collectors To No More Than Seven Times Per Week Per Debt...

The Proposed Rule Would Limit “The Number Of Times A Debt Collector May Attempt To Contact A Consumer By Telephone About A Specific Debt,” With Collectors Able To Contact A Borrower “No More Than Seven Times Per Week.” “It provides a numeric limit on the number of times a debt collector may attempt to contact a consumer by telephone about a specific debt. Under the proposal, debt collectors could try to contact consumers no more than seven times per week, and once contact is made, a debt collector would have to wait at least one week before calling the consumer again.” [Thomas H. Wagner, “[The CFPB’s Long Awaited Debt Collection Rule is Certain to Shake Up the Industry](#),” *The National Law Review*, 05/20/19]

- **The Proposed Rule Would Restrict The Number Of Calls A Collector Could Make Per Debt.** “The senators also raised concerns over other components of the Administration’s proposal, including allowing a debt collector to call a consumer seven times a week per debt.” [[Press Release](#), Sen. Catherine Cortez Masto, 06/07/19]

...Which Could Result In “Dozens Of Calls Each Week” For Consumers With Multiple Debts, Such As Separate Bills For A Single Medical Event.

April Kuehnhoff, An Attorney For The National Consumer Law Center, Noted That The Seven-Call Weekly Limit “Could Be Particularly Tough On People With Medical Debt” As A Single Medical Event Could Result In Several Bills From Several Providers, “Potentially Resulting In Dozens Of Calls Each Week.” “For instance, the center wants a limit of just three telephone attempts each week on a debt. The seven-call limit could be particularly tough on people with medical debt, Kuehnhoff said. They may accumulate bills from several providers for a single medical event — hospital, doctors, a lab and a nursing home, for example — and all could be in collections separately, potentially resulting in dozens of calls each week. [Kaiser

Health News, "[New rules would change how collectors can go after medical debt,](#)" *The Oregonian*, 06/02/19]

Consumers Advocates Believed The CFPB's Final Debt Collection Rule Did Little To Help Consumers, Especially Those Of Color, Avoid Debt Collection Harassment During A Pandemic.

Consumer Advocates Believed The Final Rule, While Omitting Some Of The "Most Harmful Parts Of The Proposed Rule," Did Little To Help Consumers – Especially Those Of Color – Avoid Countless Debt Collection Calls And Electronic Communications.

Rachel Gittleman Of The Consumer Federation Of America Acknowledge The Final Rule Did Not Contain Many Of The "Most Harmful Parts Of The Proposed Rule," But Still Believed It Fell "Short To Protect Consumers, Especially Consumers Of Color Who Have A Drastically Larger Share Of Debt In Collections Than White Communities, From Harassing Calls And Electronic Communication." "Vulnerable consumers are facing unprecedented financial challenges in the wake of the pandemic," said Rachel Gittleman, financial services outreach manager with the Consumer Federation of America. "Although the CFPB dropped or delayed some of the most harmful parts of the proposed rule, it has fallen short to protect consumers, especially consumers of color who have a drastically larger share of debt in collections than white communities, from harassing calls and electronic communication."

Kiran Sidhu, Policy Counsel For The Center For Responsible Lending, Stated The CFPB's Final Debt Collection Rule Did Not "Do Enough To Protect Communities Of Color, Especially During COVID-19, Who Are Still Struggling To Recover From The Great Recession Because Of Discriminatory Exclusion From The Financial Mainstream And Predatory Inclusion Into High-Cost Loan Products." "We applaud the CFPB for dropping the safe harbor that would have widened the door for collectors to use state courts to sue consumers on wrong or incomplete information," said Center for Responsible Lending policy counsel Kiran Sidhu. "But, the CFPB's final rule does not do enough to protect communities of color, especially during COVID-19, who are still struggling to recover from the Great Recession because of discriminatory exclusion from the financial mainstream and predatory inclusion into high-cost loan products." [National Consumer Law Center Press Release, [10/30/20](#)]

Tom Pahl Previously Oversaw Debt Collection Rulemaking Both At The CFPB And The Federal Trade Commission.

Tom Pahl Was “Closely Involved” In “Shepherding” The CFPB’s Previous Debt Collection Rulemaking While A Managing Counsel At The Bureau For Over Three Years.

Before He Was Named A Policy Associate Director At The CFPB, Tom Pahl Was A Managing Counsel “Closely Involved In The CFPB’s Debt Collection Rulemaking” In The Bureau’s Office Of Regulations. “Pahl also spent time as managing counsel at the Consumer Financial Protection Bureau’s Office of Regulations, where he was responsible for rulemaking, guidance and policy development activities. During this time, Pahl was closely involved in the CFPB’s debt collection rulemaking efforts.” [[“Tom Pahl, Acting Director of the FTC’s Bureau of Consumer Protection, to Speak at ACA International’s Washington Insights Conference,”](#) ACA International, 03/14/18]

- **Tom Pahl Was Managing Counsel At The CFPB For Three And A Half Years.** “Pahl is in demand because he spent three and a half years as a managing counsel at the bureau, a creation of the 2010 Dodd-Frank financial regulatory law that has already levied \$12 billion in fines and penalties against firms that break the rules.” [“Veteran Consumer Finance Regulator Heads Downtown,” *Congressional Quarterly Magazine*, 11/11/16]

Tom Pahl “Spent More Than Three Years Shepherding” The CFPB’s Previous Debt Collection Rule Efforts. “At the agency, Pahl spent more than three years shepherding a contentious plan to regulate the debt-collection industry, about which the bureau receives more consumer complaints than any other industry.” [“Veteran Consumer Finance Regulator Heads Downtown,” *Congressional Quarterly Magazine*, 11/11/16]

- **Tom Pahl Started At The CFPB As A Policy Associate Director In April 2018.** [[LinkedIn Profile for Thomas Pahl](#)], accessed 07/18/19]

Tom Pahl Was “In The Thick Of It” At The CFPB, “Responsible For Rulemaking, Policy Development And Regulatory Guidance To Implement Laws Governing Debt Collection.” “Pahl was in the thick of it at the bureau, responsible for rulemaking, policy development and regulatory guidance to implement laws governing debt collection and credit reporting.” [“Veteran Consumer Finance Regulator Heads Downtown,” *Congressional Quarterly Magazine*, 11/11/16]

Pahl “Managed” The Federal Trade Commission Division That Oversaw Rulemaking And Policy Development For Debt Collection Activities For Six Years.

Tom Pahl Oversaw Rulemaking And “Policy Development Activities” Over Debt Collection As An Assistant Director For The Division Of Financial Practices At The Federal Trade Commission’s Bureau Of Consumer Protection. “Prior to joining the CFPB, Mr. Pahl was Assistant Director for the Division of Financial Practices, Bureau of Consumer Protection at the Federal Trade Commission, where he managed the division responsible for law enforcement, rulemaking and policy development activities related to financial services, including debt collection, payday lending, mortgage lending and debt relief services.” [[“Former](#)

[CFPB Attorney Thomas B. Pahl Joins Arnall Golden Gregory's Washington Office,](#)”
BusinessWire, 09/20/16]

Tom Pahl Was Assistant Director In The FTC's Division Of Financial Practices For Six Years. “Pahl first joined the FTC in 1990, and spent more than two decades serving in various positions, including for six years as assistant director in the Division of Financial Practices, which oversees debt collection issues. In his current position, Pahl oversees the FTC's attorneys, investigators, and administrative personnel working to protect consumers from unfair and deceptive practices in the marketplace.” [[“Tom Pahl, Acting Director of the FTC's Bureau of Consumer Protection, to Speak at ACA International's Washington Insights Conference,”](#) ACA International, 03/14/18]

Tom Pahl Has Railed Against Potential Debt Collection Rules And Argued That The CFPB “Should Abandon These Efforts As An Exercise In 'Regulatory Humility.’”

Tom Pahl Has Opposed CFPB Limits Against How Many Times Debt Collectors Can Contact Consumers, Arguing The Bureau “Should Abandon These Efforts As An Exercise In 'Regulatory Humility.’”

Thomas Pahl Opposed CFPB Limits On How Many Times Debt Collectors Can Contact Consumers, Arguing That The Bureau “Should Abandon These Efforts As An Exercise In 'Regulatory Humility.’” “In January 2017, Thomas Pahl wrote a piece opposed to CFPB limits on the number of times debt collectors may contact consumers titled “Collector Contact Caps and the Application of 'Regulatory Humility.’” Responding to a recent CFPB announcement that it was “considering proposing rules that would mandate specific numerical limits on communications through all methods between debt collectors and consumers,” Pahl said that the Bureau “should abandon these efforts as an exercise in 'regulatory humility.’” [Thomas Pahl, [“Collector Contact Caps and the Application of 'Regulatory Humility,’”](#) *insideARM*, 01/30/17]

Pahl Has Argued That States, Not The CFPB, Should Have “Primary Oversight” Over Attorneys In Debt Collection Litigation.

Thomas Pahl Has Argued That States, And Not The CFPB, Should Have “Primary Oversight” Over Aspects Of Debt Collection Litigation. In December 2017, Thomas Pahl wrote a piece opposed to CFPB regulation of debt collection litigation titled, “Why States Should Have Primary Oversight of Attorney’s Activities in Debt-Collection Litigation.” He wrote that the CFPB's work on debt collection “may impose even more extensive and complicated requirements to flesh out meaningful involvement, substantiation, and other FDCPA [Fair Debt Collection Practices Act] concepts for representations made in complaints.” He claimed that applying “FDCPA standards and state court and state bar standards at the same time to the representations in complaints risks conflict and confusion that will make it harder for collection

litigation attorneys to comply with the law." [Thomas Pahl, "[Why States Should Have Primary Oversight of Attorney's Activities in Debt-Collection Litigation](#)," *insideARM*, 12/14/18]

Tom Pahl Has Represented Companies Regulated By The CFPB, Including Debt Collectors And Credit Reporting Agencies.

While At Arnall Golden Gregory LLP, Tom Pahl Represented CFPB-Regulated Companies, Including "Consumer Reporting Agencies, Debt Collectors, Debt Buyers, [And] Creditors."

Thomas Pahl Represented "Consumer Reporting Agencies, Debt Collectors, Debt Buyers, Creditors And Other Consumer Financial Services Companies." "Thomas B. Pahl, the former managing counsel at the Consumer Financial Protection Bureau, recently joined Arnall Golden Gregory LLP [...] He will focus on representing consumer reporting agencies, debt collectors, debt buyers, creditors and other consumer financial services companies in his practice. Pahl led efforts for rulemaking, policy development and regulatory guidance to implement the Fair Debt Collection Practices Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the Dodd-Frank Act and other regulatory requirements at the CFPB." ["[Former CFPB Managing Counsel Thomas Pahl Joins D.C. Law Firm](#)," ACA International, 09/22/16]

Pahl Worked "Closely" With Lead Consumer Regulatory Lawyer Robert Belair, Who Has Represented A Major Debt Collection Industry Trade Group That Had 575 Member Companies As Of Early 2017.

Arnall Golden Gregory (AGG) Claimed That Tom Pahl Was To 'Work Closely' With Robert R. Belair, The Firm's "Leader Of The Privacy And Consumer Regulatory Practice." "Mr. Pahl will work closely with Robert R. Belair, leader of the Privacy and Consumer Regulatory Practice and the firm's Washington office." [[Press Release](#), Arnall Golden Gregory LLP, accessed 07/03/19]

AGG Partner Robert Belair Has Been "Regulatory Council For DBA International." "AGG Partner Robert R. Belair, who leads AGG's Privacy Practice Group, is quoted in a May 23, 2012, *Collections & Credit Risk* article titled 'Debt Collectors Ramping Up For CFPB Audits' [...]. The Consumer Financial Protection Bureau is expected to clarify its guidelines for audits on July 21, 2012, but in the meantime, organizations like ACA International and DBA International have created training modules regarding best practices for complying with the Fair Debt Collections Practice Act. Mr. Belair, who also serves as regulatory council for DBA, finds it highly likely that the CFPB will base its examination on the FDCPA, which is why DBA is developing a certification program for members to help them learn industry best practices and benchmark their performance against regulatory guidelines and the expectations of auditors." ["[Bob Belair Quoted in Collections & Credit Risk](#)," Arnall Golden Gregory LLP, 05/23/12]

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- “Mr. Belair also serves as Federal Legislative / Regulatory Counsel to the DBA International.” [[“Robert R. Belair - Legal Compliance Counsel, Debt Recovery Market,”](#) Fin.Solutions, accessed 07/03/19]

In Early 2017, DBA International Became The Receivables Management Association, A “Trade Association That Represents More Than 575 Companies” In The Debt Collection Industry. “The receivables management industry is abuzz as newly elected association President Mark Naiman announced that DBA International is now Receivables Management Association. The membership voted to approve the new name today as part of a change in the association bylaws.” [[“DBA International is now Receivables Management Association,”](#) *insideARM*, 02/09/17]

- “Receivables Management Association is the nonprofit trade association that represents more than 575 companies that purchase performing and nonperforming receivables on the secondary market.” [[“DBA International is now Receivables Management Association,”](#) *insideARM*, 02/09/17]

Tom Pahl Is “A Frequent Speaker” At Conferences Hosted By ACA International, The Largest Debt Collection Industry Trade Group.

Tom Pahl Is “A Frequent Speaker” At Events Hosted By ACA International, “The Largest Trade Group For The Debt Collection Industry.”

Tom Pahl Is “A Frequent Speaker” At Events Hosted By ACA International. “As a frequent speaker at ACA events, Pahl also appeared at ACA International’s Washington Insights Conference in both 2015 and 2016 and shared insights into the CFPB’s approach to developing rules to regulate the accounts receivable management industry, as well as debt collection research conducted by the CFPB to inform its decision making.” [[“Thomas Pahl to Return to CFPB’s Rulemaking Division,”](#) ACA International, 04/18/18]

- **ACA International Is “The Largest Trade Group For The Debt Collection Industry.”** “ACA International, the largest trade group for the debt collection industry, represents approximately 2,500 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, who employ more than 129,000 employees worldwide.” [[“ACA International Fact Sheet,”](#) ACA International, January 2019]

In May 2019, Tom Pahl Was A Featured Speaker At ACA International’s 2019 “Washington Insights Fly-In.”

Tom Pahl Was A Featured Speaker At ACA International’s 2019 Washington Insights Fly-In That Took Place May 14-16, 2019. [[“Washington Insights Speakers,”](#) ACA International, accessed 07/01/19]

In May 2018, Tom Pahl And Then-CFPB Director Mick Mulvaney Were Featured Speakers At ACA International's "Washington Insights Conference."

Tom Pahl Was A Featured Speaker At ACA International's 2018 "Washington Insights Conference" That Took Place May 21-23, 2018. "Mulvaney and Pahl are speakers at ACA International's upcoming Washington Insights Conference, May 21-23. Members will greatly benefit from their insights on the FTC, CFPB and regulations for the accounts receivable management industry." [[Thomas Pahl to Return to CFPB's Rulemaking Division](#)," ACA International, 04/18/18]

In Both 2015 And 2016, Tom Pahl Was A Featured Speaker At ACA International's "Washington Insights Conference."

Tom Pahl Was A Featured Speaker At Both ACA International's 2015 And 2016 Washington Insights Fly-Ins. "As a frequent speaker at ACA events, Pahl also appeared at ACA International's Washington Insights Conference in both 2015 and 2016 and shared insights into the CFPB's approach to developing rules to regulate the accounts receivable management industry, as well as debt collection research conducted by the CFPB to inform its decision making." [[Thomas Pahl to Return to CFPB's Rulemaking Division](#)," ACA International, 04/18/18]

In November 2011, Tom Pahl Led A Session At ACA International's "Fall Forum," Where He Claimed That The Fair Debt Collection Practices Act Was Intended "To Be Enforced Primarily By Private Actions Rather Than Through Government Enforcement."

In November 2011, Tom Pahl Led A Session On "The FTC's Enforcement Priorities Related To The Collection Industry" At ACA International's 2011 Fall Forum. "ACA International's 2011 Fall Forum conference brought together credit and collection professionals in Chicago. The event took place Nov. 9-11, 2011, with nearly 400 ACA members gathering for three days of education and networking. [...] In a session led by Thomas Pahl, assistant director of the Federal Trade Commission's Division of Financial Practices, attendees learned about the FTC's enforcement priorities related to the collection industry." [[Fall Forum Takes Chicago Collector](#)," *Insurance News Net*, 01/02/12]

- **At The Event, Pahl Spoke About The "Value The Debt Collection Industry" Brings To The Economy And Claimed That The Fair Debt Collection Practices Act Was Intended "To Be Enforced Primarily By Private Actions Rather Than Through Government Enforcement."** "Pahl noted the FTC realizes the value the debt collection industry, working in compliance with the Fair Debt Collection Practices Act, brings to the American economy. [...] Pahl also addressed the future relationship between the FTC and the Consumer Financial Protection Bureau as it relates to collection industry oversight. He pointed out that when the FDCPA was originally passed, Congress

intended for it to be enforced primarily by private actions rather than through government enforcement.” [[Fall Forum Takes Chicago \[Collector\]](#),” *Insurance News Net*, 01/02/12]

Tom Pahl Is Scheduled To Speak At An Upcoming “Executive Summit” Of The Receivables Management Association International, A Debt Collection Trade Group That Hosted Pahl At Its Annual Conference Last Year.

Tom Pahl Is Scheduled To Speak At An “Intimate Gathering” Of Industry Insiders An Upcoming “Executive Summit” Of The Receivables Management Association International (RMAI).

Tom Pahl Will Speak At RMAI’s Executive Summit On July 31 At 1:50 PM In A Session Titled “A Conversation With Our Federal Regulators.” [[2019 Executive Summit Agenda](#), Receivables Management Association International, accessed 06/25/19]

- **RMAI Is Hosting Its 2019 Executive Summit, An “Intimate Gathering Of 125 Professionals,” From July 30 To August 1 In Sedona, Arizona.** From July 30 To August 1 In Sedona, Arizona, RMAI will be holding an “intimate gathering of 125 professionals provides attendees the opportunity to network with other executives, have conversations with policymakers, and receive education on executive-level operations.” [[2019 Executive Summit](#), Receivables Management Association International, accessed 06/25/19]

RMAI Is A Debt Collection Industry Trade Group.

RMAI Is A Debt Collection Industry Trade Group That “Represents More Than 575 Companies That Purchase Performing And Nonperforming Receivables On The Secondary Market.” “Receivables Management Association is the nonprofit trade association that represents more than 575 companies that purchase performing and nonperforming receivables on the secondary market.” [[DBA International is now Receivables Management Association](#),” *insideARM*, 02/09/17]

In February 2018, Tom Pahl Was A Featured Speaker At RMAI’s Annual Conference.

Tom Pahl Was A Featured Speaker At The 2018 RMAI Annual Conference In Las Vegas On February 7, 2018, Speaking On “Updates, Forecasts, And Financial Services: An In-depth Discussion With The FTC.” [[RMAI 2018 Annual Conference Agenda](#), Receivables Management Association International, accessed 07/01/19]

Tom Pahl Is A Longtime “Opponent Of Regulation” Who Helped “Repeal A Rule Requiring Businesses Warn Consumers About The Potentially Lethal Danger Of Quick-Freeze Aerosol Spray” At The FTC.

Tom Pahl Is An “Opponent Of Regulation” Who Helped The Federal Trade Commission (FTC) “Repeal A Rule Requiring Businesses Warn Consumers About The Potentially Lethal Danger Of Quick-Freeze Aerosol Spray” In The 1990s.

Tom Pahl Is An “Opponent Of Regulation” Who Helped “Repeal A Rule Requiring Businesses Warn Consumers About The Potentially Lethal Danger Of Quick-Freeze Aerosol Spray” “During His Tenure At The FTC In The 1990s.” “Despite Pahl's familiarity with the commission, he may appear an odd choice to run a bureau that aims to protect consumers. Pahl has long advocated for doing away with many of what he and fellow conservatives see as excessive regulation. During his tenure at the FTC in the 1990s, he helped repeal a rule requiring businesses warn consumers about the potentially lethal danger of quick-freeze aerosol spray. He also helped see the abandon of the FTC's regulations on fallout shelters, first put in place during the Cold War.” [“FTC Taps Opponent of Regulation To Head Up Consumer Protection Efforts,” *International Business Times*, 02/09/17]

Debt Collection Industry Trade Groups Have Spent Over \$2.1 Million On Federal Lobbying Since Donald Trump Took Office

ACA International Has Spent Nearly \$1.3 Million Lobbying The Federal Government, Including The CFPB, Since Donald Trump Took Office.

ACA International Is “The Largest Trade Group For The Debt Collection Industry.”

ACA International Is “The Largest Trade Group For The Debt Collection Industry.” “ACA International, the largest trade group for the debt collection industry, represents approximately 2,500 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, who employ more than 129,000 employees worldwide.” [[ACA International Fact Sheet](#),” ACA International, January 2019]

In 2017, ACA International Spent \$390,000 Lobbying Congress.

In The First Quarter Of 2017, ACA International Spent \$90,000 Lobbying Congress. In the first quarter of 2017, ACA International spent \$90,000 lobbying on H.R. 1849 - Practice of Law Technical Clarification Act; S. 105 - Consumer Financial Protection Board Act, S. 387 - Consumer Financial Protection Bureau Accountability Act; S. 370 - Bureau of Consumer Financial Protection Repeal of Title X; S. 365 - Consumer Financial Protection Act, S. 564 - HANGUP Act; S. 575 - Stop Debt Collection Abuse Act; H.R. 864 - Stop Debt Collection Abuse Act. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/17/17]

In The Second Quarter Of 2017, ACA International Spent \$90,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/12/17]

In The Third Quarter Of 2017, ACA International Spent \$130,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/17]

In The Fourth Quarter Of 2017, ACA International Spent \$80,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/18/18]

In 2018, ACA International Spent \$690,000 Lobbying Congress, The Treasury Department, The CFPB, The FTC, And The FCC.

In The First Quarter Of 2018, ACA International Spent \$120,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/18]

In The Second Quarter Of 2018, ACA International Spent \$190,000 Lobbying Congress, The CFPB, The FTC, And The FCC. In the second quarter of 2018, ACA International lobbied on H.R. 1849/H.R. 4550 - Practice of Law Technical Clarification Act; S. 105 - Consumer Financial Protection Board Act; S. 387 - Consumer Financial Protection Bureau Accountability Act; S. 365 - Consumer Financial Protection Act; H.R. 10 - Financial CHOICE Act; H.R. 2706 - The Financial Institution Consumer Protection Act; H. R. - 864 Stop Debt Collection Abuse Act; S. 575 - Stop Debt Collection Abuse Act; S. 2155 - Economic Growth, Regulatory Relief, and Consumer Protection Act; H.R. 2683 - Protecting Veteran Credit Act; H.R. 5266 - The Financial Product Safety Commission Act; H.R. 5534 - The Give Useful Information to Define Effective Compliance Act; S. 564 - HANGUP Act; and S. 3078/H.R. 6026. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/18]

- ACA International also lobbied on “issues related to” Fair Debt Collection Practices Act Rulemaking; Fair Debt Collection Practices Act Rule SBREFA Process; CFPB Consumer Complaint Reporting; the Telephone Consumer Protection Act; and Call Blocking Technologies. [[ACA International Lobbying Report](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/18]

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In The Third Quarter Of 2018, ACA International Spent \$200,000 Lobbying Congress, The Treasury Department, The CFPB, The FTC, And The FCC. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/18]

In The Fourth Quarter Of 2018, ACA International Spent \$180,000 Lobbying Congress, The Treasury Department, The CFPB, The FTC, And The FCC. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/18/19]

So Far In 2019, ACA International Has Spent \$190,000 Lobbying Congress, The Treasury Department, The SBA, The FTC, And The FCC.

In The First Quarter Of 2019, ACA International Spent \$190,000 Lobbying Congress, The Treasury Department, The SBA, The FTC, And The FCC. In the first quarter of 2019, ACA International lobbied on H.R. 189 - Financial Institution Customer Protection Act of 2019; H.R. 946 - Stopping Bad Robocalls Act; H.R.1304; H.R. 1421/S. 626 - HANGUP Act; H.R.1575; H.R. 1602; S.151 - TRACED Act; S.819 - The FCC Reporting Modernization Act; S.187 - CFPB-IG Act; H.R. 969; and S.453 - Consumer Financial Protection Bureau Accountability Act of 2019. [[ACA International Lobbying Report](#), U.S. Senate Lobbying Disclosure Act Database, 04/16/19]

- ACA International also lobbied on “issues related to” Operation Chokepoint, the Telephone Consumer Protection Act, call blocking and labeling technologies, Shaken/Stir, Federal Data Privacy legislation, Consumer Financial Protection Bureau Fair Debt Collection Practices Act rulemaking, Consumer Financial Protection Bureau complaint database, Consumer Financial Protection Bureau Request for Information process, medical debt, the Telephone Consumer Protection Act. [[ACA International LD-2 Lobbying Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/16/19]

The Receivables Management Association International Has Spent \$480,000 Lobbying The Federal Government, Including The CFPB, Since Donald Trump Took Office.

Receivables Management Association International (RMAI) Is A Debt Collection Industry Trade Group.

RMAI Is A Debt Collection Industry Trade Group That “Represents More Than 575 Companies That Purchase Performing And Nonperforming Receivables On The Secondary Market.” “Receivables Management Association is the nonprofit trade association that represents more than 575 companies that purchase performing and nonperforming receivables on the secondary market.” [[DBA International is now Receivables Management Association](#),” *insideARM*, 02/09/17]

In 2017, RMAI Spent \$200,000 Lobbying Congress, The CFPB, The Treasury Department, The OCC, And The FTC.

In The First Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, And The FTC. In the first quarter of 2017 RMAI paid K&L Gates LLP \$50,000 to lobby Congress, the CFPB, and FTC on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act.” [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/21/17]

In The Second Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, The FTC, And The OCC. In the second quarter of 2017, RMAI paid K&L Gates LLP \$50,000 to lobby Congress, the CFPB, the FTC, and OCC on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act” and H.R. 10 - the Financial CHOICE Act of 2017. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/17]

In The Third Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, The FTC, And The OCC. In the third quarter of 2017, RMAI paid K&L Gates LLP \$50,000 to lobby Congress, the CFPB, the FTC, and OCC on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act;” H.R. 10 - the Financial CHOICE Act of 2017; H.R. 864 - Stop Debt Collection Abuse Act of 2017; and H.R. 1849 - Practice of Law Technical Clarification Act of 2017. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/17/17]

In The Fourth Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, The FTC, And The OCC. In the fourth quarter of 2017, RMAI paid K&L Gates LLP \$50,000 to lobby Congress, the CFPB, the FTC, and Treasury Department on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act” and “H.R. 1849 and H.R. 4550, Practice of Law Technical Clarification Act of 2017.” [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/20/18]

In 2018, RMAI Spent \$220,000 Lobbying Congress, The Treasury Department, The CFPB, And The FTC.

In The First Quarter Of 2018, RMAI Spent \$50,000 Lobbying Congress, The Treasury Department, The CFPB, And The FTC. In the first quarter of 2018, RMAI paid K&L Gates LLP \$50,000 to lobby Congress, the CFPB, FTC, and Treasury Department on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act,” and “H.R. 1849 and H.R. 4550, Practice of Law Technical Clarification Act of 2017.” [[K&L Gates LLP](#), U.S. Senate Lobbying Disclosure Act Database, 04/18/18]

In The Second Quarter Of 2018, RMAI Spent \$60,000 Lobbying Congress, The Treasury Department, The CFPB, And The FTC. In the second quarter of 2018, RMAI paid K&L Gates LLP \$60,000 to lobby Congress, the CFPB, FTC, and Treasury Department on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act,” and “H.R. 1849 and H.R. 4550, Practice of Law Technical Clarification Act of 2017.” [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/18/18]

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In The Third Quarter Of 2018, RMAI Spent \$60,000 Lobbying Congress, The CFPB, And The FTC. In the third quarter of 2018, RMAI paid K&L Gates LLC \$60,000 to lobby Congress, the CFPB, and FTC on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act,” and “H.R. 1849 and H.R. 4550, Practice of Law Technical Clarification Act of 2017.” [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/20/18]

In The Fourth Quarter Of 2018, RMAI Spent \$50,000 Lobbying Congress, The CFPB, And The FTC. In the fourth quarter of 2018, RMAI paid K&L Gates LLP \$50,000 to lobby Congress, the CFPB, and FTC on “implementation of Title X, P.L. 111-203, Dodd-Frank Wall Street Reform and Consumer Protection Act,” and “H.R. 1849 and H.R. 4550, Practice of Law Technical Clarification Act of 2017.” [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/19/19]

So Far In 2019, RMAI Has Spent \$60,000 On Federal Lobbying.

In The First Quarter Of 2019, RMAI Spent \$60,000 Lobbying Congress, The CFPB, And The FTC. In the first quarter of 2019, RMAI paid K&L Gates LLP \$60,000 to lobby Congress, the CFPB, and FTC on “Issues related to debt re-sales and collection.” [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/19]

The National Creditors Bar Association (NCBA) Has Spent Nearly \$400,000 Lobbying The Federal Government, Including The CFPB, Since Donald Trump Took Office.

The National Creditors Bar Association (NCBA) Is A Trade Group Representing Debt Collection Lawyers.

In April 2018, NARCA (Formerly The National Association Of Retail Collections Attorneys) Changed Its Name To The National Creditors Bar Association “As It Broadened Its Membership Beyond Retail Collection To Include All 19 Areas Of Creditors Rights-Related Legal Representation.” “This month, NARCA is pleased to announce that National Creditors Bar Association is now the official name of the national bar association. The change to National Creditors Bar Association was overwhelmingly passed recently in a vote by the membership. This is an historic day in the 25th Anniversary year of the bar association. ‘NARCA’ is a vestige of the National Association of Retail Collections Attorneys, which the Association officially ceased to use as its official name two and a half years ago. The acronym persisted until this year, but was limiting and no longer adequately described the expanding bar association as it broadened its membership beyond retail collection to include all 19 areas of creditors rights-related legal representation.” [[“National Creditors Bar Association Is the New Identity of NARCA,” InsideARM, 04/17/18](#)]

NCBA Has Opposed CFPB Efforts To Regulate The Debt Collection Process, Claiming That “Federal Regulators Cannot Regulate Attorney Conduct.”

The National Creditors Bar Association Has Opposed “Efforts By The Consumer Financial Protection Bureau To Limit Law Firms' Involvement In The Debt Collection Process.” “A recent court ruling has dealt a blow to efforts by the Consumer Financial Protection Bureau to limit law firms' involvement in the debt collection process. According to the decision, the agency had failed to prove that a Cleveland law firm, Weltman, Weinberg & Reis, had engaged in illegal debt collection practices harming consumers by sending them demand letters on law firm letterhead.” [Kate Berry, “[Legal industry scores victory over CFPB in debt collection battle](#),” *American Banker*, 07/27/18]

- **NCBA President Yale R. Levy Claimed That “Federal Regulators Cannot Regulate Attorney Conduct.”** “Yale R. Levy, president of the National Creditors Bar Association, said that the decision confirms that attorneys who practice in the area of creditors rights law ‘are actively and meaningfully involved in all stages of the process.’ He and others stressed that attorneys are state-licensed, and federal regulators cannot regulate attorney conduct. ‘Attorneys need to be held to the standards set forth by the State Supreme Court’s in which they practice not a governmental agency,’ Levy said in a statement.” [Kate Berry, “[Legal industry scores victory over CFPB in debt collection battle](#),” *American Banker*, 07/27/18]

In 2017, NCBA Spent \$160,000 Lobbying Congress And The CFPB On Legislation Affecting Debt Collection Regulation.

In The First Quarter Of 2017, NCBA Spent \$40,000 Lobbying Congress And The CFPB On Legislation To Amend The Fair Debt Collection Practices Act. In the first quarter of 2017, NCBA paid RR&G LLC \$40,000 to lobby Congress and the CFPB on H.R. 1849 - Practice of Law Technical Clarification Act. [[RR&G, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 04/20/17]

- H.R. 1849, the Practice of Law Technical Clarification Act sought “[t]o amend the Fair Debt Collection Practices Act to exclude law firms and licensed attorneys who are engaged in activities related to legal proceedings from the definition of a debt collector, to amend the Consumer Financial Protection Act of 2010 to prevent the Bureau of Consumer Financial Protection from exercising supervisory or enforcement authority with respect to attorneys when undertaking certain actions related to legal proceedings, and for other purposes.” [[H.R.1849 - Practice of Law Technical Clarification Act of 2017 Text](#), U.S. House of Representatives, 04/03/17]

In The Second Quarter Of 2017, NCBA Spent \$40,000 Lobbying Congress And The CFPB. In the second quarter of 2017, NCBA paid RR&G, LLC \$40,000 to lobby Congress and the CFPB on H.R. 1849 - Practice of Law Technical Clarification Act. [[RR&G, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 07/20/17]

In The Third Quarter Of 2017, NCBA Spent \$40,000 Lobbying Congress And The CFPB. In the third quarter of 2017, NCBA paid RR&G, LLC \$40,000 to lobby Congress and the CFPB on

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H.R. 1849 - Practice of Law Technical Clarification Act. [[RR&G, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 10/19/17]

In The Fourth Quarter Of 2017, NCBA Spent \$40,000 Lobbying Congress And The CFPB. In the fourth quarter of 2017, NCBA paid RR&G, LLC \$40,000 to lobby Congress and the CFPB on H.R. 1849 - Practice of Law Technical Clarification Act. [[RR&G, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 01/22/18]

In 2018, NCBA Spent \$200,000 Lobbying Congress And The CFPB On “Creditor’s Rights” And Legislation Affecting Debt Collection Regulation.

In The First Quarter Of 2018, NCBA Spent \$50,000 Lobbying Congress And The CFPB On Legislation To Amend The Fair Debt Collection Practices Act. In the first quarter of 2018, NCBA paid Clark Hill, PLC \$50,000 to lobby Congress and the CFPB on “Creditor’s rights” And “HR 5082, the Practice of Law Technical Clarification Act of 2018.” [[Clark Hill, PLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 04/20/18]

- H.R. 5082, the Practice of Law Technical Clarification Act of 2018, sought to “amend the Fair Debt Collection Practices Act to exclude law firms and licensed attorneys who are engaged in activities related to legal proceedings from the definition of a debt collector, to amend the Consumer Financial Protection Act of 2010 to prevent the Bureau of Consumer Financial Protection from exercising supervisory or enforcement authority with respect to attorneys when undertaking certain actions related to legal proceedings, and for other purposes.” [[H.R.5082 - Practice of Law Technical Clarification Act of 2018](#), U.S. House of Representatives, 02/23/18]

In The Second Quarter Of 2018, NCBA Spent \$50,000 Lobbying Congress And The CFPB. In the second quarter of 2018, NCBA paid Clark Hill, PLC \$50,000 to lobby Congress and the CFPB on “Creditor’s rights” And “HR 5082, the Practice of Law Technical Clarification Act of 2018.” [[Clark Hill, PLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 07/20/18]

In The Third Quarter Of 2018, NCBA Spent \$50,000 Lobbying Congress And The CFPB. In the third quarter of 2018, NCBA paid Clark Hill, PLC \$50,000 to lobby Congress and the CFPB on “Creditor’s rights” And “HR 5082, the Practice of Law Technical Clarification Act of 2018.” [[Clark Hill, PLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 10/22/18]

In The Fourth Quarter Of 2018, NCBA Spent \$50,000 Lobbying Congress And The CFPB. In the fourth quarter of 2018, NCBA paid Clark Hill, PLC \$50,000 to lobby Congress and the CFPB on “Creditor’s rights” And “HR 5082, the Practice of Law Technical Clarification Act of 2018.” [[Clark Hill, PLC LD-2 Lobbying Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 01/22/19]

So Far In 2019, NCBA Has Spent \$30,000 Lobbying The CFPB On The Debt Collection Rule.

In The Second Quarter Of 2019, NCBA Spent \$30,000 Lobbying The CFPB. In the second quarter of 2019, NCBA paid Clark Hill, PLC \$30,000 to lobby the CFPB on “General support of the Debt Collection Rule.” [[Clark Hill, PLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act, Database, 07/16/19]

Debt Collection Industry Trade Groups Have Given Over \$460,000 In Campaign Contribution Since 2016, The Vast Majority Of Which Went To Republicans

ACA International Has Contributed Over \$460,000 To Political Campaigns Since The 2016 Election Cycle, Primarily To Republican Candidates.

During The 2018 Election Cycle, ACA International Contributed \$207,000 To Political Campaigns—88% Of Which Went To Republican Candidates And Committees.

ACA International Gave \$147,000 To Federal Candidates In The 2018 Election Cycle. [[“Contributions to Federal Candidates, 2018 Cycle,”](#) OpenSecrets.org, accessed 07/18/19]

- **ACA International Gave 88% Of Its 2018 Cycle Contributions To Republican Candidates.** [[“Contributions to Federal Candidates, 2018 Cycle,”](#) OpenSecrets.org, accessed 07/18/19]

ACA International Gave \$30,000 To The National Republican Congressional Committee In The 2018 Election Cycle. [[“PAC to PAC/Party, 2018 Cycle,”](#) OpenSecrets.org, accessed 07/18/19]

ACA International Gave \$30,000 To The National Republican Senatorial Committee In The 2018 Election Cycle. [[“PAC to PAC/Party, 2018 Cycle,”](#) OpenSecrets.org, accessed 07/18/19]

During The 2016 Election Cycle, ACA International Contributed \$253,500 To Political Campaigns—90% Of Which Went To Republican Candidates And Committees.

ACA International Gave \$185,500 To Federal Candidates In The 2016 Election Cycle. [[“Contributions to Federal Candidates, 2016 Cycle,”](#) OpenSecrets.org, accessed 07/18/19]

- **ACA International Gave 90% Of Its 2016 Cycle Contributions To Republican Candidates.** [[“Contributions to Federal Candidates, 2016 Cycle,”](#) OpenSecrets.org, accessed 07/18/19]

ACA International Gave \$30,000 To The National Republican Congressional Committee In The 2016 Election Cycle. [["PAC to PAC/Party, 2016 cycle,"](#) OpenSecrets.org, accessed 07/18/19]

ACA International Gave \$30,000 To The National Republican Senatorial Committee In The 2016 Election Cycle. [["PAC to PAC/Party, 2016 cycle,"](#) OpenSecrets.org, accessed 07/18/19]

ACA International Gave \$5,000 To Team Ryan In The 2016 Election Cycle. [["PAC to PAC/Party, 2016 cycle,"](#) OpenSecrets.org, accessed 07/18/19]

- **Team Ryan Was Former Speaker Paul Ryan's Joint Fundraising Committee.** "In all, Team Ryan, as his joint fundraising committee is called, has raised more than \$70 million in this election cycle for House Republicans, in what his aides said demonstrates his commitment to raise money aggressively to help the GOP navigate tough midterm elections." [Fredreka Schouten, "[Paul Ryan's fundraising committee raises nearly \\$10 million for midterm elections,"](#) *USA Today*, 07/13/18]

ACA International Gave \$3,000 TO The Scalise Leadership Fund In The 2016 Election Cycle. [["PAC to PAC/Party, 2016 cycle,"](#) OpenSecrets.org, accessed 07/18/19]

- **The Scalise Leadership Fund Is House Majority Whip Steve Scalise's Joint Fundraising Committee.** The Scalise Leadership Fund is "a joint fundraising committee authorized by and to benefit SCALISE FOR CONGRESS, EYE OF THE TIGER PAC, and the NRCC." [[Home](#), Scalise Leadership Fund, accessed 07/18/19]

The Receivables Management Association International Has Contributed \$3,250 To Political Campaigns Since The 2016 Election Cycle, All Of Which Went To Republican Candidates.

RMAI Gave 100% Of Its Federal Campaign Contributions To Republican Candidates During The 2018 Election Cycle.

In 2018, Receivables Management Association International Donated \$1,000 To Representative Alex Mooney (R-WV). [[Among Federal Candidates, 2018 Cycle](#), OpenSecrets.org, accessed 07/18/19]

RMAI Gave 100% Of Its Federal Campaign Contributions To Republican Candidates During The 2016 Election Cycle.

During The 2016 Election Cycle, Receivables Management Association International Donated \$1,250 To Senator Jerry Moran (R-KS). [[Among Federal Candidates, 2016 Cycle](#), OpenSecrets.org, accessed 07/18/19]

During The 2016 Election Cycle, Receivables Management Association International Donated \$500 To Representative Scott Garrett (R-NJ). [[Among Federal Candidates, 2016 Cycle](#), OpenSecrets.org, accessed 07/18/19]

During The 2016 Election Cycle, Receivables Management Association International Donated \$500 To Representative Kevin McCarthy (R-CA). [[Among Federal Candidates, 2016 Cycle](#), OpenSecrets.org, accessed 07/18/19]

Debt Collection Companies Have Given Nearly \$100,000 In Campaign Contributions Since 2016, Including Several Thousand To Donald Trump

Employees Of Major Debt Collection Companies Have Donated Nearly \$100,000 In Political Contributions Since The 2016 Election Cycle.

Absolute Resolutions Corporation Employees Have Donated A Total Of \$1,500 In Political Contributions Since The 2016 Election Cycle.

Absolute Resolutions Corporation Employees Donated A Total Of \$1,500 In Political Contributions During The 2016 Election Cycle. [[Search for Absolute Resolutions Corporation](#), Federal Election Commission, accessed 06/10/19]

Absolute Resolutions Corporation Has Been In The Debt Collection Business Since 2001. “Since its inception in 2001, Absolute Resolutions Corp. has specialized in the purchase and recovery of distressed consumer receivables, business cards and lines of credit, commercial leasing and specialty finance portfolios directly from originators.” [[Absolute Resolutions Corporation](#),” Absolute Resolutions Corporation, accessed 07/16/19]

Allen Daniels Associates, Inc. Employees Have Donated A Total Of \$500 In Political Contributions Since The 2016 Election Cycle.

Allen Daniel Associates, Inc. Employees Donated A Total Of \$500 In Political Contributions During The 2020 Election Cycle. [[Search for Allen Daniel Associates](#), Federal Election Commission, accessed 06/10/19]

Allen Daniel Associates, Inc. “Provides Collection And Adjustment Services.” “The Allen Daniel Associates, Inc. provides collection and adjustment services on claims and other insurance related issues. The Company operates in the United States.” [[Allen Daniel Associates Inc/The](#),” *Bloomberg*, accessed 07/16/19]

BCA Financial Services, Inc. Employees Have Donated A Total Of \$3,910 In Political Contributions Since The 2016 Election Cycle.

BCA Financial Services, Inc. Employees Donated A Total Of \$3,910 In Political Contributions During The 2018 Election Cycle. [[Search for BCA Financial Services](#), Federal Election Commission, accessed 07/16/19]

BCA Financial Services Provides Debt Collection Services For The Healthcare Industry. “While the healthcare industry continues to evolve, BCA helps you stay ahead of the curve- providing you the business office consulting, collections, and outsourcing solutions you need to excel. BCA provides a myriad of receivable management services encompassing all phases of accounts receivable management including extended business office, delinquent accounts, insurance follow-up programs, denials management, revenue cycle consulting, and conversion, backlog and cleanup projects.” [[Services](#),” BCA Financial Services, accessed 07/16/19]

CACi Employees Have Donated A Total Of \$1,071 In Political Contributions Since The 2016 Election Cycle.

CACi Employees Donated A Total Of \$1,041.50 In Political Contributions During The 2016 Election Cycle. [[Search for CACi](#), Federal Election Commission, accessed 07/16/19]

CACi Employees Donated A Total Of \$30 In Political Contributions During The 2018 Election Cycle. [[Search for CACi](#), Federal Election Commission, accessed 07/16/19]

Consumer Adjustment Co., Inc. (CACi) Claims To Have “Excelled” In “Bad Debt Collections” Since 1967. “Since 1967, CACi has excelled in AR management and bad debt collections. [...] Utilizing our decades of experience, we continue to provide exceptional accounts receivable liquidation service and bad debt collections results.” [[Who We Are](#),” Consumer Adjustment Co., Inc., accessed 07/16/19]

Cavalry Portfolio Services Employees Have Donated A Total Of \$4,307.58 In Political Contributions Since The 2016 Election Cycle.

Cavalry Portfolio Services Employees Donated A Total Of \$2,748 In Political Contributions During The 2016 Election Cycle. [[Search for Cavalry Portfolio Services](#), Federal Election Commission, accessed 07/16/19]

Cavalry Portfolio Services Employees Donated A Total Of \$1,559.58 In Political Contributions During The 2018 Election Cycle. [[Search for Cavalry Portfolio Services](#), Federal Election Commission, accessed 07/16/19]

Cavalry Portfolio Services, LLC Has Been A “Leader In The Acquisition And Management Of Non-Performing Consumer Loan Portfolios” Since 2002. “Founded in 2002, Cavalry is a leader in the acquisition and management of non-performing consumer loan portfolios.” [[About Calvary](#),” Calvary Portfolio Services, accessed 07/16/19]

Capio Partners Employees Have Donated A Total Of \$18,344 In Political Contributions Since The 2016 Election Cycle.

Capio Partners Employees Donated A Total Of \$18,344 In Political Contributions During The 2016 Election Cycle. [[Search for Capio Partners](#), Federal Election Commission, accessed 06/10/19]

Capio Partners Is “The Largest Purchaser Of Healthcare Receivables In The Country.” “As the largest purchaser of healthcare receivables in the country, Capio can offer healthcare providers immediate cash acceleration after accounts have been designated as bad debt.” [[“Cash Acceleration”](#), Capio, accessed 07/16/19]

CBE Group Employees Have Donated A Total Of \$68,270 In Political Contributions Since The 2016 Election Cycle.

Employees Of CBE Companies Donated A Total Of \$45,611.55 In Political Contributions During The 2016 Election Cycle. [[Search for CBE Group or CBE Companies](#), Federal Election Commission, accessed 07/16/19]

Employees Of CBE Companies Donated A Total Of \$22,659 In Political Contributions During The 2018 Election Cycle. [[Search for CBE Group or CBE Companies](#), Federal Election Commission, accessed 07/16/19]

CBE Group Has Been “Serving Hundreds Of Creditors, Universities And Federal Government Clients, Including Internal Revenue Service,” Since 1933. “Since 1933, we have been serving hundreds of creditors, universities and federal government clients, including Internal Revenue Service (IRS). We look forward to assisting you with your payment.” [[“Thank you for visiting CBE Companies”](#), CBE Group, accessed 07/16/19]

Performant Employees Have Donated A Total Of \$1,492 In Political Contributions Since The 2016 Election Cycle.

Performant Employees Have Given A Total Of \$250 In Political Contributions In The 2020 Election Cycle. [[Search for Performant](#), Federal Election Commission, accessed 07/16/19]

Performant Employees Gave A Total Of \$1,142 In Political Contributions In The 2018 Election Cycle. [[Search for Performant](#), Federal Election Commission, accessed 07/16/19]

Performant Employees Gave A Total Of \$100 In Political Contributions In The 2016 Election Cycle. [[Search for Performant](#), Federal Election Commission, accessed 07/16/19]

Performant Is In The Business Of “Recovering Delinquent And Improperly Paid Assets.” “Performant helps organizations enhance revenue and contain costs by preventing, identifying and recovering delinquent and improperly paid assets.” [[“About Us”](#), Performant, accessed 07/16/19]

Debt Collection Company Employees Have Donated Over \$3,000 To Political Committees Associated With Donald Trump Since The 2016 Election Cycle.

Capio Partners Executives Have Donated A Total Of \$1,929.22 To Trump Campaign Committees Since The 2016 Election Cycle.

Capio Partners Executives Donated A Total Of \$1,834 To Political Committees Associated With Donald Trump During The 2016 Election Cycle. [[Search for Capio Partners](#), Federal Election Commission, accessed 07/16/19]

- **Mark Detrick, CEO Of Capio Partners, Donated \$1,000 To Donald J. Trump For President, Inc. On October 16, 2016.** [[Search for Mark Detrick](#), Federal Election Commission, accessed 07/16/19]
- **Mark Detrick, CEO Of Capio Partners, Donated \$400 To Donald J. Trump For President, Inc. On September 18, 2016.** [[Search for Mark Detrick](#), Federal Election Commission, accessed 07/16/19]
- **Richard James, Chairman Of Capio Partners, Donated \$184 To The Trump Make America Great Again Committee On August 4, 2016.** [[Search for Richard James](#), Federal Election Commission, accessed 07/16/19]
- **Richard James, An Executive For Capio Partners, Donated \$250 To The Stop Hillary PAC On November 3, 2016.** [[Search for Richard James](#), Federal Election Commission, accessed 07/16/19]

Capio Partners Executives Donated A Total Of \$95.22 To Political Committees Associated With Donald Trump In The 2018 Election Cycle. [[Search for Capio Partners](#), Federal Election Commission, accessed 07/16/19]

- **Mark Detrick, CEO Of Capio Partners, Donated \$67.43 To Donald J. Trump For President, Inc. On February 17, 2017.** [[Search for Mark Detrick](#), Federal Election Commission, accessed 07/16/19]
- **Mark Detrick, CEO Of Capio Partners, Donated \$27.79 To Donald J. Trump For President, Inc. On January 3, 2017.** [[Search for Mark Detrick](#), Federal Election Commission, accessed 07/16/19]

Capio Partners Is “The Largest Purchaser Of Healthcare Receivables In The Country.” “As the largest purchaser of healthcare receivables in the country, Capio can offer healthcare providers immediate cash acceleration after accounts have been designated as bad debt.” [[Cash Acceleration](#),” Capio, accessed 07/08/19]

CBE Employees Have Donated \$28 To Trump Campaign Committees Since The 2016 Election Cycle.

A CBE Group Employee Donated \$28 To Donald J. Trump For President, Inc. On August 10, 2016. [[Search for CBE](#), Federal Election Commission, accessed 06/10/19]

CBE Group Has Been “Serving Hundreds Of Creditors, Universities And Federal Government Clients, Including Internal Revenue Service,” Since 1933. “Since 1933, we have been serving hundreds of creditors, universities and federal government clients, including Internal Revenue Service (IRS). We look forward to assisting you with your payment.” [[Thank you for visiting CBE Companies](#),” CBE Group, accessed 07/08/19]

Performant Employees Have Given A Total Of \$1,106.74 To Trump Campaign Committees Since The 2016 Election Cycle.

Performant Employees Donated A Total Of \$621.74 To Political Committees Associated With Donald Trump During The 2018 Election Cycle. [[Individual Contributions Search](#), Federal Election Commission, accessed 07/08/19]

Performant Employees Donated A Total Of \$485 To Political Committees Associated With Donald Trump During The 2016 Election Cycle. [[Individual Contributions Search](#), Federal Election Commission, accessed 07/08/19]

Performant Is In The Business Of “Recovering Delinquent And Improperly Paid Assets.” “Performant helps organizations enhance revenue and contain costs by preventing, identifying and recovering delinquent and improperly paid assets.” [[About Us](#),” Performant, accessed 07/08/19]

Debt Collection Company Employees Have Given Nearly \$39,000 To Republican Campaigns And Committees Since The 2016 Election Cycle.

Absolute Resolutions Corporation Employees Have Donated \$1,000 To Republican Campaigns Since The 2016 Election Cycle.

Absolute Resolutions Corporation Employees Donated A Total Of \$1,000 To Republican Congressional Candidates During The 2016 Election Cycle. [[Search for Absolute Resolutions Corporation](#), Federal Election Commission, accessed 07/16/19]

- **Absolute Resolutions Corporation Executives Donated \$1,000 To Senator Jerry Moran (R-KS) During The 2016 Election Cycle.** Michael Bendickson And Mark Naiman, Both Identified As CEOs Of Absolute Resolutions Corporation, Each Gave \$500 To The Moran For Kansas Committee In The 2016 Election Cycle. [[Search for Absolute Resolutions Corporation](#), Federal Election Commission, accessed 07/16/19]

Absolute Resolutions Corporation Has Been In The Debt Collection Business Since 2001.

“Since its inception in 2001, Absolute Resolutions Corp. has specialized in the purchase and recovery of distressed consumer receivables, business cards and lines of credit, commercial leasing and specialty finance portfolios directly from originators.” [[“Absolute Resolutions Corporation,”](#) Absolute Resolutions Corporation, accessed 07/16/19]

BCA Financial Services Employees Have Donated A Total Of \$2,000 To Republican Campaigns Since The 2016 Election Cycle.

BCA Financial Services, Inc. Employees Donated A Total Of \$2,000 To Republican Candidates During The 2018 Election Cycle. [[Search for BCA Financial Services,](#) Federal Election Commission, accessed 07/16/19]

- **Pamela Kirchner, CEO Of BCA Financial Services, Donated A Total Of \$2,000 To Political Committees Associated With Senator Marco Rubio (R-FL) During The 2018 Election Cycle.** [[Search for BCA Financial Services,](#) Federal Election Commission, accessed 07/16/19]

BCA Financial Services Provides Debt Collection Services For The Healthcare Industry.

“While the healthcare industry continues to evolve, BCA helps you stay ahead of the curve—providing you the business office consulting, collections, and outsourcing solutions you need to excel. BCA provides a myriad of receivable management services encompassing all phases of accounts receivable management including extended business office, delinquent accounts, insurance follow-up programs, denials management, revenue cycle consulting, and conversion, backlog and cleanup projects.” [[“Services,”](#) BCA Financial Services, accessed 07/16/19]

Cavalry Portfolio Services Employees Have Donated A Total Of \$2,700 To Republican Campaigns Since The 2016 Election Cycle.

Andrew Zaro, A “Debt Purchaser” For Cavalry Portfolio Services, Donated \$2,700 To Chris Christie For President, Inc. During The 2016 Election Cycle. [[Search for Cavalry Portfolio Services,](#) Federal Election Commission, accessed 07/16/19]

- “Andrew Zaro is the Founder and Chairman of Cavalry Investments Holdings, LLC and its subsidiaries.” (‘Cavalry’).” [[“Andrew Zaro,”](#) USC Thornton School of Music, 07/16/19]

Cavalry Portfolio Services, LLC Has Been A “Leader In The Acquisition And Management Of Non-Performing Consumer Loan Portfolios” Since 2002. “Founded in 2002, Cavalry is a leader in the acquisition and management of non-performing consumer loan portfolios.” [[“About Calvary,”](#) Calvary Portfolio Services, accessed 07/16/19]

Capio Partners’ Chairman Has Donated \$485 To The Republican National Committee Since The 2016 Election Cycle.

A Capio Partners Executive Donated A Total Of \$485 To The Republican National Committee During The 2016 And 2018 Election Cycles.

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- **Richard James, Chairman Of Capio Partners, Gave \$230 To The Republican National Committee On October 4, 2016.** [[Search for Capio Partners](#), Federal Election Commission, accessed 07/16/19]
- **Richard James, Chairman Of Capio Partners, Gave \$255 To The Republican National Committee On January 17, 2017.** [[Search for Capio Partners](#), Federal Election Commission, accessed 07/16/19]

Capio Partners Is “The Largest Purchaser Of Healthcare Receivables In The Country.”

“As the largest purchaser of healthcare receivables in the country, Capio can offer healthcare providers immediate cash acceleration after accounts have been designated as bad debt.”

[[Cash Acceleration](#),” Capio, accessed 07/16/19]

CBE Executives Have Given A Total Of \$30,000 To Republican Political Campaign Committees Since The 2016 Election Cycle.

Executives From The CBE Group And CBE Companies Gave A Total Of \$7,500 To Republican Political Committees In The 2016 Election Cycle.

- **Thomas Penaluna, President Of The CBE Group, Inc., Gave A Total Of \$5,000 To The Grassley Committee Inc. On April 28, 2015.** [[Search for Thomas Penaluna](#), Federal Election Commission, accessed 07/16/19]
- **Chad Benson, President Of The CBE Companies, Gave \$500 To The Grassley Committee, Inc. On December 31, 2015.** [[Search for Chad Benson](#), Federal Election Commission, accessed 07/16/19]
- **Thomas Penaluna, President Of The CBE Group, Inc., Gave A Total Of \$1,000 To The Republican Party Of Iowa On November 30, 2015.** [[Search for Thomas Penaluna](#), Federal Election Commission, accessed 07/16/19]
- **Thomas Penaluna, President Of The CBE Group, Inc., Gave A Total Of \$1,000 To Blum For Congress On March 23, 2016.** [[Search for Thomas Penaluna](#), Federal Election Commission, accessed 07/16/19]

An Executive From The CBE Group And CBE Companies Donated A Total Of \$22,500 To Political Committees Associated With Republican Congressional Candidates During The 2018 Election Cycle.

- **Thomas Penaluna, Chairman Of The CBE Companies, Donated A Total Of \$20,000 To Political Committees Associated With Senator Joni Ernst (R-IA) During The 2018 Election Cycle.** [[Search for Thomas Penaluna](#), Federal Election Commission, accessed 07/16/19]
- **Thomas Penaluna, Chairman Of The CBE Group, Donated A Total Of \$2,500 To Blum For Congress During The 2018 Election Cycle.** [[Search for Thomas Penaluna](#), Federal Election Commission, accessed 07/16/19]

CBE Group Has Been “Serving Hundreds Of Creditors, Universities And Federal Government Clients, Including Internal Revenue Service,” Since 1933. “Since 1933, we have been serving hundreds of creditors, universities and federal government clients, including Internal Revenue Service (IRS). We look forward to assisting you with your payment.” [[Thank you for visiting CBE Companies](#),” CBE Group, accessed 07/16/19]

Performant Employees Have Donated Republican Political Committees \$1,700 Since The 2016 Election Cycle.

- **Dr. Jon D. Shaver, A Chairman For Performant, Donated \$250 To The “Georgians For Isakson” Committee On February 13, 2019.** [[Georgians for Isakson Schedule A](#), Federal Election Commission, 02/13/19]
- **A Performant Employee Donated \$250 To The “Texans For Senator John Cornyn Inc” Committee On April 17, 2017.** [[Texans for Senator John Cornyn Schedule A](#), Federal Election Commission, 04/17/17]
- **A Performant Employee Donated \$100 To The “Marco Rubio For President” Committee On March 1, 2016.** [[Marco Rubio For President Schedule A](#), Federal Election Commission 03/01/16]
- **A Performant Employees Donated \$100 To The “Conaway For Congress” Committee On May 19, 2015.** [[Conaway for Congress Schedule A](#), Federal Election Commission, 05/19/15]
- **Dr. Jon Shaver, A Chairman For Performant, Donated \$1,000 To “Boehner for Speaker” on March 24, 2015.** [[Boehner for Speaker Schedule A](#), Federal Election Commission, 03/24/15]

Performant Is In The Business Of “Recovering Delinquent And Improperly Paid Assets.” “Performant helps organizations enhance revenue and contain costs by preventing, identifying and recovering delinquent and improperly paid assets.” [[About Us](#),” Performant, accessed 07/16/19]