

United States Senate

WASHINGTON, DC 20510

April 28, 2025

The Honorable Russell Vought
Acting Director
Consumer Financial Protection Bureau
1700 G St. NW
Washington, DC 20552

Dear Acting Director Vought,

We write with grave concerns about illegal actions you are taking in your acting role at the Consumer Financial Protection Bureau (CFPB). On April 17, you tried to fire nearly all of the agency's remaining 1,700 employees—the staff responsible for fulfilling the CFPB's mission and statutory requirements to prevent Americans from getting scammed by big banks and giant corporations.¹ Your hasty and unjustified mass firings are an illegal shutdown of the CFPB that will leave it unable to conduct agency actions that are required by law.

You directed the gutting of entire divisions—including departments created by Congress to protect servicemembers and older Americans—attempting to leave a shell of only 200 employees to supervise and examine large financial institutions across the country, respond to millions of consumer complaints, answer the phone for hundreds of thousands of people seeking help, monitor emergency financial risks, and run all of the agency's other operations. This rush to dismantle the CFPB without any careful analysis of the impact on its work is not only illegal, it also defies a court order prohibiting you from shutting down the agency and interfering with its statutorily required responsibilities.²

A bipartisan majority in Congress created the CFPB as part of the Dodd-Frank Act in the wake of the 2008 financial crisis.³ Since its creation, the CFPB has returned over \$21 billion to Americans cheated by giant companies and has been the primary federal regulator supervising and examining the largest financial institutions across the country for compliance with consumer financial protection laws. Congress authorized the CFPB to play this role and required it to perform more than 80 specific functions to protect consumers and our economy from the types of rampant consumer abuse that set off the Great Recession.⁴ It is not possible for your proposed

¹ AP News, "Nearly 90% of Consumer Financial Protection Bureau cut as Trump's government downsizing continues," Chris Megerian, April 17, 2025, <https://apnews.com/article/donald-trump-doge-cfpb-elon-musk-456b747c367fccbcf3b74d2893cd1a35>; National Treasury Employees Union v. Russell Vought, Declaration of Mark Paoletta, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.109.0.pdf>.

² National Treasury Employees Union v. Russell Vought, Declaration of Jennifer Bennett, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.106.1.1.pdf>.

³ Congressional Research Service, "The Consumer Financial Protection Bureau Budget: Background, Trends, and Policy Options," February 4, 2025, <https://www.congress.gov/crs-product/R48295>.

⁴ Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law 111-203; Student Borrower Protection Center and Consumer Federation of America, "Statutory Requirements for the Continuous Operation of the CFPB,"

skeleton crew of CFPB employees to conduct anything close to all of those congressionally mandated activities to protect consumers. To take just a few examples, your planned cuts include:

- **Slashing staff so just 16 employees would be responsible for addressing millions of complaints from scammed consumers.** Under 12 U.S.C. 5493(b)(3) and 5511(c), the CFPB must maintain an office for collecting, investigating, and addressing complaints from consumers about financial products and services. Specifically, the law states that the “Director shall establish a unit whose functions shall include establishing a single, toll-free telephone number, a website, and a database or utilizing an existing database to facilitate the centralized collection of, monitoring of, and response to consumer complaints regarding consumer financial products or services.”⁵

In 2024 alone, CFPB received more than 2.7 million complaints, routed more than 100,000 complaints to other regulators, directed more than 100,000 complaints to companies, and oversaw the vendor responsible for handling more than 40,000 calls per month.⁶ But according to court filings, you have slashed the staff in that responsible section of the CFPB from approximately 135 to 16 people (and did not consult the head of the Office of Consumer Response to determine how to continue fulfilling the agency’s statutory responsibilities).⁷ In fact, the head of that office said that after the staff cuts, “the Office will be incapable of performing its statutory duties.”⁸

- **Wiping out the office required to help members of our military, leaving just one employee responsible for assisting thousands of service members and their families.** Under 12 U.S.C. 5493(e), the Director “shall establish an Office of Service Member Affairs, which shall be responsible for developing and implementing initiatives for service members and their families.”⁹ These initiatives must include efforts to “educate and empower service members and their families to make better informed decisions regarding consumer financial products and services,” “monitor complaints by service members and their families and responses to those complaints by the Bureau or other appropriate Federal or State agency” and “coordinate efforts among Federal and State agencies . . . regarding consumer protection measures relating to consumer financial products and services offered to, or used by, service members and their families.”¹⁰

Persis Yu and Erin Witte, February 13, 2025, <https://protectborrowers.org/wp-content/uploads/2025/02/CFPB-Statutory-Requirements-2.13.25.pdf>.

⁵ 12 U.S.C. 5493(b)(3).

⁶ National Treasury Employees Union v. Russell Vought, Third Declaration of Matthew Pfaff, April 18, 2025, https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.106.2_2.pdf.

⁷ *Id.*; National Treasury Employees Union v. Russell Vought, Declaration of Mark Paoletta, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.109.0.pdf>.

⁸ National Treasury Employees Union v. Russell Vought, Third Declaration of Matthew Pfaff, April 18, 2025, https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.106.2_2.pdf.

⁹ 12 U.S.C. 5493(e).

¹⁰ *Id.*

There are more than two million service members in the United States.¹¹ In 2023, servicemembers and their families submitted nearly 84,600 complaints to the CFPB, a 27% increase from 2022 and a 98% increase from 2021.¹² But according to court filings, you have gutted the entire office so it will be staffed by a single person.¹³

- **Eliminating support for older Americans, leaving just one employee focused on the tens of millions of seniors who are disproportionately targeted by scams and fraud.** Under 12 U.S.C. 5493(g), the CFPB must maintain an “Office of Financial Protection for Older Americans” that is “headed by an assistant director” and must “facilitate the financial literacy of [seniors] on protection from unfair, deceptive, and abusive practices and on current and future financial choices.”¹⁴ The office must specifically monitor certifications of financial advisors, conduct research to identify best practices for counseling seniors about personal financial management, develop goals for financial literacy programs, coordinate consumer protection efforts with other federal and state regulators, and work with outside organizations involved with assisting seniors.¹⁵

There are roughly 62 million adults aged 65 and older in the United States.¹⁶ According to the FBI, older Americans are disproportionately the targets of scams and fraud; these crimes against Americans over age 60 caused \$3.4 billion in losses in 2023. The average older fraud victim lost \$33,915 in 2023.¹⁷ But according to court filings, you have eliminated all but one position in the Office of Financial Protection for Older Americans.¹⁸

- **Gutting the capacity to supervise hundreds of giant financial institutions and to enforce the law.** Under 12 U.S.C. 5514(b) and 5515, the CFPB has exclusive authority to supervise banks with more than \$10 billion in assets—along with all nonbank lenders—to ensure they are complying with federal consumer financial laws and to assess risks they may pose to consumers and the broader market for consumer financial products.¹⁹ The Chair of the Federal Reserve confirmed earlier this year that the CFPB is the only federal regulator examining giant banks to ensure they are following federal consumer financial

¹¹ U.S. Department of Defense, “2023 Demographics: Profile of the Military Community,” <https://download.militaryonesource.mil/12038/MOS/Reports/2023-demographics-report.pdf>.

¹² Consumer Financial Protection Bureau, “CFPB Report Highlights Challenges Facing Servicemembers and Veterans with Student Loans,” September 24, 2024, <https://www.consumerfinance.gov/about-us/newsroom/cfpb-report-highlights-challenges-facing-servicemembers-and-veterans-with-student-loans/>.

¹³ National Treasury Employees Union v. Russell Vought, Declaration of Mark Paoletta, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.109.0.pdf>.

¹⁴ 12 U.S.C. 5493(g).

¹⁵ *Id.*

¹⁶ Pew Research Center, “U.S. centenarian population is projected to quadruple over the next 30 years,” Katherine Schaeffer, January 9, 2024, <https://www.pewresearch.org/short-reads/2024/01/09/us-centenarian-population-is-projected-to-quadruple-over-the-next-30-years/>.

¹⁷ Federal Bureau of Investigation, “Elder Fraud, In Focus,” April 30, 2024, <https://www.fbi.gov/news/stories/elder-fraud-in-focus#:~:text=Scams%20targeting%20individuals%20aged%2060,impacted%20by%20scams%20and%20fraud.>

¹⁸ National Treasury Employees Union v. Russell Vought, Declaration of Mark Paoletta, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.109.0.pdf>.

¹⁹ 12 U.S.C. 5514(b); 12 U.S.C. 5515.

laws.²⁰ The CFPB is responsible for supervising more than 180 banks and bank affiliates²¹ as well as many nonbank lenders that service more than 55% of the U.S. mortgage market. But according to court filings, you have slashed the staff responsible for this nationwide supervision of hundreds of institutions from 487 to just 50 employees, with only 50 additional people remaining from the 248 who were previously assigned to pursue legal action when the CFPB discovers illegal activity or violations of consumer protection laws.²²

- **Dismantling the office responsible for monitoring developments in our markets that could crash our economy again.** Under 12 U.S.C. 5493(b)(1), the CFPB must maintain a research unit to analyze and report on trends in consumer financial products and services, including on consumer understanding of costs, risks and benefits of those products; the use of disclosures; and access to fair and affordable credit for traditionally underserved communities.²³ Under 12 U.S.C. 5499, the CFPB must maintain public access to all published data sets.²⁴ Under 12 U.S.C. 5512(c), it must actively monitor and issue reports on emerging risks to consumers.²⁵ Under 12 U.S.C. 5106(a)(1), 2809(a), and 2809(c), it must also help maintain a registration system for mortgage loan originators; compile statistics, on an ongoing basis, on mortgage issuance; and make mortgage issuance data available to the public.²⁶ But according to court filings, your cuts would slash the research unit from 208 to 22 staff and eliminate all 10 current employees of the data office.²⁷
- **Eliminating almost 90% of the agency that has returned \$21 billion to scammed consumers and families.** The examples above only illustrate the broader ways in which you are dismantling the CFPB, where you plan to leave a single person responsible for the Office of Fair Lending and Equal Opportunity, a single person in the Office of Civil Rights, a Private Education Loan Ombudsman with no staff, no Chief Data Officer, and almost no one responsible for basic tasks like running CFPB operations—much less fulfilling all of the more than 80 statutory obligations of the agency.²⁸ You appear to have no plan for ensuring the CFPB meaningfully meets its responsibilities, including many not highlighted here—such as maintaining an Office of Financial Education,²⁹ working

²⁰ Reuters, “Fed’s Powell: No agency other than CFPB tasked with consumer protection enforcement,” February 11, 2025, <https://www.reuters.com/world/us/feds-powell-no-agency-other-than-cfpb-tasked-with-consumer-protection-2025-02-11/>.

²¹ Consumer Financial Protection Bureau, “Institutions subject to CFPB supervisory authority,” <https://www.consumerfinance.gov/compliance/supervision-examinations/institutions/>.

²² National Treasury Employees Union v. Russell Vought, Declaration of Mark Paoletta, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.109.0.pdf>.

²³ 12 U.S.C. 5493(b)(1).

²⁴ 12 U.S.C. 5499.

²⁵ 12 U.S.C. 5512(c).

²⁶ 12 U.S.C. 5106(a)(1); 12 U.S.C. 2809(a); 12 U.S.C. 2809(c).

²⁷ National Treasury Employees Union v. Russell Vought, Declaration of Mark Paoletta, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.109.0.pdf>.

²⁸ *Id.*

²⁹ 12 U.S.C. 5493(d).

with a Consumer Advisory Board,³⁰ engaging in community affairs,³¹ and regulating mortgage loan servicing.³²

In short, it is not possible for the CFPB to perform all of its statutorily required functions with a staff of 200 people left after slashing almost 90% of the agency. Directors from both Republican and Democratic Administrations have all made clear that they needed far more personnel to fulfill their responsibilities under the law. Even during the cuts early in the first Trump Administration, the number of employees never dropped below 1,400—nearly seven times the broken shell that would be left after you have hollowed out the staff.³³ In fact, staffing increased after Director Kathy Kraninger—appointed by President Trump—undertook a “comprehensive planning initiative in 2019 to determine the staffing levels needed to support and execute the Bureau’s priorities in Fiscal Year 2020.”³⁴

Maintaining the staff to perform the agency’s required functions is a critical responsibility. There is no other federal agency that is chiefly responsible for enforcing our federal consumer financial protection laws, and consumers across America will be left to fend for themselves against a broad swath of unchecked financial frauds and scams. Though the Trump Administration filed a document on April 18 with a superficial list of the number of people assigned to some sections of the CFPB, it includes a number of zeroed-out offices and does not explain how the remaining 200 staff will perform each of the agency’s required functions.³⁵

In light of these significant concerns, we request that you provide—by May 7, 2025—a detailed accounting of each of the more than 80 statutory obligations of the CFPB, the number of employees assigned to each of those functions as of December 2024, the number of employees who would be assigned to each function if your rushed reduction in force were to go into effect, the immediate impact of such a reduction on the agency’s ability to perform each function consistent with federal law and federal court orders, and copies of any individualized or particularized analysis of those planned reductions on the agency’s work.

Sincerely,

³⁰ 12 U.S.C. 5494(a).

³¹ 12 U.S.C. 5493(b)(2).

³² 12 U.S.C. 2605(j)(3).

³³ Consumer Financial Protection Bureau, “Financial Report of the Bureau of Consumer Financial Protection: Fiscal Year 2020,” p.8, https://files.consumerfinance.gov/f/documents/cfpb_annual-financial-report_fy-2020.pdf.

³⁴ *Id.*

³⁵ National Treasury Employees Union v. Russell Vought, Declaration of Mark Paoletta, April 18, 2025, <https://storage.courtlistener.com/recap/gov.uscourts.dcd.277287/gov.uscourts.dcd.277287.109.0.pdf>.



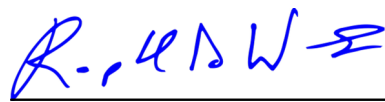
Elizabeth Warren
Ranking Member
Committee on Banking,
Housing, and Urban Affairs



Charles E. Schumer
United States Senator



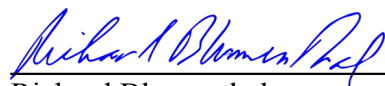
Chris Van Hollen
United States Senator



Raphael Warnock
United States Senator



Kirsten Gillibrand
United States Senator



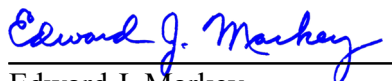
Richard Blumenthal
United States Senator



Sheldon Whitehouse
United States Senator



Angela Alsobrooks
United States Senator



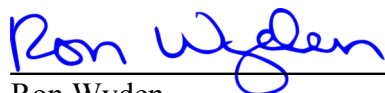
Edward J. Markey
United States Senator



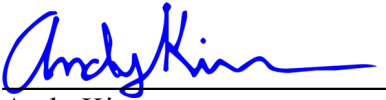
Cory A. Booker
United States Senator



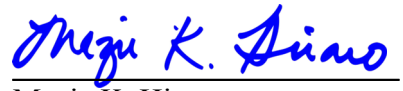
Richard J. Durbin
United States Senator



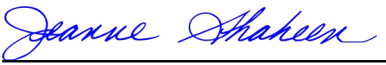
Ron Wyden
United States Senator



Andy Kim
United States Senator



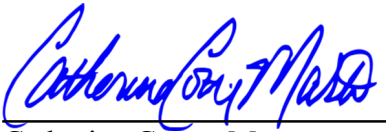
Mazie K. Hirono
United States Senator



Jeanne Shaheen
United States Senator



Bernard Sanders
United States Senator



Catherine Cortez Masto
United States Senator



Jack Reed
United States Senator



Alex Padilla
United States Senator



Mark R. Warner
United States Senator



Tina Smith
United States Senator



Jacky Rosen
U.S. Senator



Martin Heinrich
United States Senator



Lisa Blunt Rochester
United States Senator

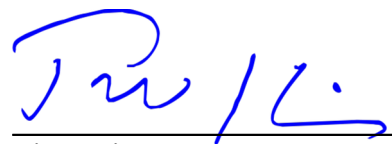


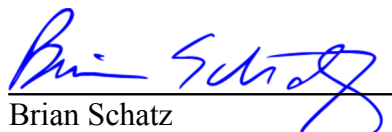
Christopher A. Coons
United States Senator

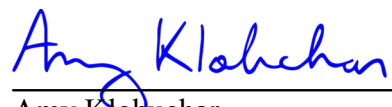


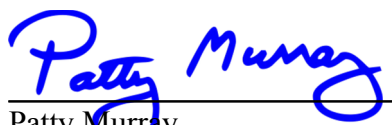
Ruben Gallego
United States Senator


Jeffrey A. Merkley
United States Senator

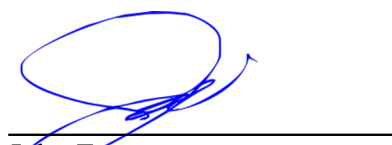

Tim Kaine
United States Senator

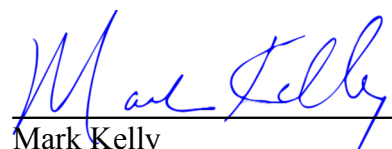

Brian Schatz
United States Senator

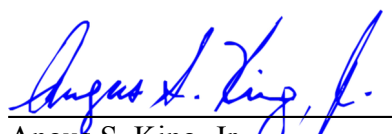

Amy Klobuchar
United States Senator

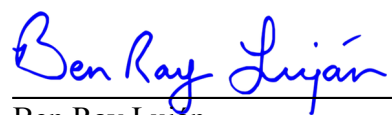

Patty Murray
United States Senator


Peter Welch
United States Senator


John Fetterman
United States Senator


Mark Kelly
United States Senator

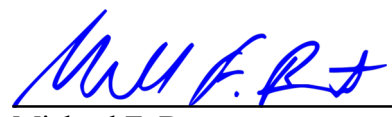

Angus S. King, Jr.
United States Senator


Ben Ray Lujan
United States Senator


Tammy Baldwin
United States Senator


Elissa Slotkin
United States Senator


Adam B. Schiff
United States Senator


Michael F. Bennet
United States Senator