

Breach of Trust:

CFPB's Complaint Database Shows
Consumers Need Help After Equifax Breach



EQUIFAX

PRODUCTS & SOLUTIONS



Prepared by the Offices of
Senators Elizabeth Warren, Brian Schatz
and Robert Menendez

April 2018

Contents

| | |
|--|----------|
| Executive Summary | 1 |
| Introduction | 2 |
| Findings | 3 |
| I. Consumer Complaints about Improper Use of Credit Reports | 3 |
| II. Consumer Complaints about Incorrect Information on Credit Reports | 4 |
| III. Consumer Complaints about Equifax’s Inadequate Assistance Resolving Problems After the Breach | 4 |
| IV. Consumer Complaints about Fraud Alerts, Security Freezes, Credit Monitoring, or Identity Theft Support Services | 5 |
| V. Other Consumer Complaints | 5 |
| VI. Conclusion | 6 |
| Endnotes | 7 |



Breach of Trust: CFPB's Complaint Database Shows Consumers Need Help After Equifax Breach

Prepared by the Staffs of Senators Elizabeth Warren, Brian Schatz and Robert Menendez



Executive Summary

On September 7th, 2017, Equifax announced that it had allowed hackers to access the sensitive information of more than 143 million Americans in one of the largest security breaches of consumer data in history. In the wake of that breach, Equifax promised to make things right.

Almost immediately, consumers used the Consumer Financial Protection Bureau's (CFPB) consumer complaint hotline to register problems and concerns with the breach and Equifax's response to it. This analysis contains the first comprehensive review of consumer complaints in the wake of the Equifax breach. It finds that, in the six months following the breach's announcement, the CFPB received more than 20,000 complaints from consumers about the impact of the breach, problems with the Equifax response, or other issues with the company – nearly double the amount of complaints received regarding Equifax in the six months prior to the announcement.

The number and nature of these complaints is particularly important because of public reports that cast doubt upon the CFPB's investigation of Equifax and the agency's commitment to assist consumers and address the fallout of the breach. In early February, reports indicated that the CFPB, under the new leadership of Office of Management and Budget (OMB) Director Mick Mulvaney, had declined to collaborate with other regulators in investigating Equifax and may have abandoned its own investigation. While the CFPB has confirmed that an inquiry is still open, reports suggest that the agency has slowed down or stalled the investigation into the Equifax breach and its impact on consumers.

This report concludes that, based on the thousands of complaints received by the agency, the CFPB should act quickly and aggressively to hold Equifax accountable. Specific findings include:

- In six months between September 7, 2017, when Equifax announced the breach of sensitive consumer information, and March 7, 2018, consumers have filed more than 20,000 complaints regarding Equifax
- The CFPB received more than **7,000 complaints of improper use of a credit report after the breach**, the risks of which jumped after Equifax exposed

credit card numbers, birth dates, social security numbers, and other personal information belonging to millions of Americans

- The CFPB received more than **7,000 complaints of incorrect information on a credit report**, a problem made significantly more prevalent by the increased risk of identity theft in the aftermath of the Equifax breach
- The CFPB received more than **3,000 complaints about Equifax's inadequate assistance in resolving problems after the breach**, highlighting Equifax's inability or unwillingness to assist consumers with their concerns
- The CFPB received more than **1,500 complaints regarding Equifax's credit monitoring services, fraud alerts, security freezes, and other identity theft protection products**, demonstrating the company's inadequate consumer support services in the wake of the breach

Consumers are facing myriad problems even six months after the breach, and continue to seek assistance from the CFPB. Specific complaints reported by consumers included:

- A consumer who had their "opportunity for employment...denied because of [their] Equifax credit report," and despite apparently proving that fraud had led to the false accounts being placed on their file, was unable to get help after Equifax "re inserted" both accounts onto their report.
- A consumer who, in the wake of the breach "was redirected to call 6 different phone numbers," and when they were unable to get additional assistance from Equifax, their finances were "frozen for over a month," causing them "extreme hardship."
- Consumers who were materially injured by Equifax's negligent cybersecurity and reckless response to the breach. One consumer faced problems with their Equifax credit report that were "damaging [their] credit rating" when they were "in the process of buying a house."
- Another consumer who, after learning that their "information was part of the Equifax breach," was unable to get Equifax to remove fraudulent accounts and inquiries from their report despite

trying “multiple times,” even filing a police report over the false accounts listed on their report.

- Another consumer who complained that Equifax had not contacted them to provide assistance with similar problems, specifically adding that “I have been a victim of identity theft and I have suffered from the credit breach.”

Equifax continued to keep important information from the public, leaving consumers to fend for themselves. This report provides strong evidence that the CFPB must hold the company accountable and act decisively to protect the millions of consumers harmed by this breach.

Introduction

On September 7, 2017, Equifax announced that it had allowed hackers to access the sensitive information of more than 143 million Americans in one of the largest security breaches of consumer data in history.¹ After failing to adopt strict cybersecurity measures to protect valuable consumer data, Equifax then mishandled the aftermath of the breach, failing to properly assist consumers, and in some cases, making the situation even worse. The company waited 40 days to alert consumers and regulators; initially asked that consumers waive their rights to file lawsuits just to receive free credit monitoring services; increased their profits through their partnership with LifeLock because of the ensuing rush for credit protection; and set up frustrating and ineffective call centers and other consumer support measures.²

Five months after the breach, reports indicated that Equifax was continuing to withhold information from the public about the extent of the breach. We still do not fully understand the scope of the harm to consumers or what measures Equifax is taking to avoid such catastrophic failures of cybersecurity and consumer support in the future.

The Consumer Financial Protection Bureau was established by the Dodd-Frank Wall Street Reform and Consumer Protection Act in order to enforce federal consumer protection laws. The CFPB is responsible for protecting consumers from “unfair, deceptive, or abusive acts and practices.”³ The CFPB also has clear supervisory authority over large consumer reporting agencies, including Equifax.⁴

In his response to Senator’s Warren’s September 2017 letter to the CFPB, former Director Richard Cordray outlined the bureau’s authority over Equifax and efforts to investigate the breach and assist consumers. He described the CFPB’s “authority...to review the data security practices of financial institutions... to determine whether such practices violate Federal consumer financial laws...which include prohibitions on unfair, deceptive, or abusive acts and practices.”⁵ He added that the CFPB “is the only Federal agency that has any supervisory authority over the larger consumer reporting companies.”⁶

Director Cordray also noted that the “recent breach at Equifax poses an enormous threat to consumers,” and given that risk, informed Senator Warren that the bureau was “currently looking into the data breach and Equifax’s response.”⁷ More specifically, he claimed that the bureau was “working with our Federal and state partners to respond to the problems at Equifax,” including through efforts with other banking regulatory agencies.⁸ Director Cordray committed that the CFPB would “continue to examine and investigate consumer reporting companies,” adding that “a breach of this magnitude calls for a coordinated response.”⁹

Despite the severe threat to consumers and the authority and responsibility of the CFPB to investigate and respond to such threats, recent reports indicate that under the control of Office of Management and Budget Director Mick Mulvaney, the agency may have slowed down or stalled its investigation into the Equifax breach. The investigation has reportedly “sputtered since” Mr. Mulvaney took over at the CFPB, because he has “not ordered subpoenas against Equifax or sought sworn testimony from executives,” both of which are “routine steps when launching a full-scale probe.”¹⁰ Furthermore, reports suggest that the CFPB “rebuffed bank regulators...when they offered to help with on-site exams of credit bureaus,” despite former Director Cordray making it clear that this cooperation was both necessary and welcome.¹¹

In response to our inquiry, Mr. Mulvaney stated that “it is a matter of public record that the Bureau is looking into Equifax’s data breach and response,” and that any claims that there is no such investigation “are incorrect.”¹² But Mr. Mulvaney did not specify whether the reporting about the sluggishness of his investigation is correct. Mr. Mulvaney also did not comment on

whether the CFPB had stopped examining credit bureaus, or whether it had rejected offers of assistance from other bank regulators.

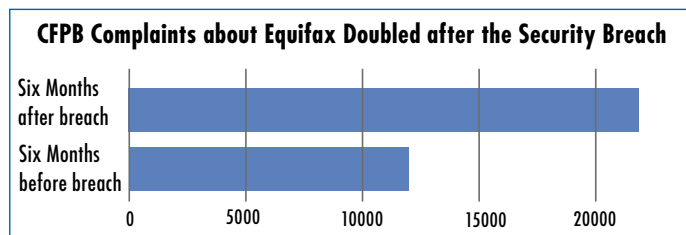
Mr. Mulvaney has stated that the bureau “will be focusing on quantifiable and unavoidable harm to the consumer,” and that “quantitative analysis” would drive the work, stating, “there’s a lot more math in our future.”¹³ Mr. Mulvaney also told his employees that “we will be prioritizing[.]” – and specifically cited – the number of complaints received on certain issues as a factor that would determine investigative priorities.¹⁴ The CFPB’s consumer complaint database collects complaints from consumers around the country on a variety of issues, offering a quantitative look at the problems plaguing consumers. As Mr. Mulvaney noted, the database should serve as a guide for the bureau.

This report does the math. It analyzes data and individual complaints from the CFPB’s consumer complaint database in order to determine the extent of the impact of the Equifax breach on consumers, the effectiveness of the CFPB response, and whether this data justified a CFPB investigation. Staff reviewed complaints that mention “Equifax” between September 7, 2017, the day the breach was announced, and March 7, 2018. Staff also read through individual complaints to understand the issues facing consumers.

Findings

The results of this staff review of CFPB complaints about Equifax reveal that consumers filed 21,921 complaints in the six months after Equifax announced the massive breach of consumer data – nearly double the amount of complaints related to Equifax in the six months preceding the announcement – and more complaints arrive every day.¹⁵ And while complaints regarding Equifax nearly doubled, consumer complaints filed regarding the company’s competitors, TransUnion and Experian, remained roughly the same or increased only slightly during the same period.¹⁶

From September 7, 2017 through March 7, 2018 – the six months after Equifax announced the breach –



consumers filed 21,921 complaints regarding Equifax.¹⁷ In the six months prior to the announcement, consumer filed only 11,973 complaints.¹⁸

I. Consumer Complaints about Improper Use of Credit Reports

As of March 7, 2018, the CFPB had received 7,448 complaints over the improper use of a credit report since Equifax announced the data breach in September 2017.¹⁹

Under the Fair Credit Reporting Act (FCRA), only certain individuals may request and receive a consumer credit report, and they can only do so for certain “permissible” reasons.²⁰ If a credit reporting agency provides a consumer’s report to the wrong person or company, or to a permissible individual without the proper justification, this violates the FCRA. This category of complaints includes several sub-categories, such as “Reporting company used your report improperly” and “credit inquiries on your report that you don’t recognize.”²¹

After the Equifax breach, the data of more than 145 million Americans was at risk – for many consumers, that includes credit card numbers, names, birth dates, addresses, and driver’s license numbers. When a thief obtains a consumer’s information, they can use it to apply for a loan in the consumer’s name, apply for a credit card, file fraudulent income tax returns, or even make purchases. If a thief uses a consumer’s PII to apply for a credit card, for example, the financial institution will request the consumer’s credit report from Equifax. That’s just one example of how the Equifax breach could lead to a consumer complaint over improper use of their credit report.

In December, three months after the Equifax breach, one consumer noted that they had “several inquir[i]es on my credit report from this company,” even though they “never authorize[d] for them to pull my credit.”²² This presented a huge problem, since the requests were “damaging [their] credit rating” when they were “in the process of buying a house.”²³ Another consumer complained of a similar problem, and specifically added that “I have been a victim of identity theft and I have suffered from the credit breach.”²⁴ Despite this complaint, the consumer was frustrated that “the credit bureau and creditor” did not contact them to provide assistance.²⁵

Another complaint from December came from a consumer who had “a very difficult year with credit in every way you could think of,” and was frustrated that Equifax “continues to place unrecognized and inaccurate inquiries” on their credit file.²⁶ The consumer had contacted the credit bureaus, only to be “placed on uncomfortable hold on the phone” and to have “supervisors hanging the phone up” on them.²⁷ Yet another consumer wrote in that they had “tried to get this resolved with Equifax customer service and they have not been helpful in removing these fraudulent inquiries” from their credit report.²⁸

The wealth of complaints over the improper use of consumer credit reports is one indication of the impact of the breach. As one consumer who spotted such an inquiry but struggled to get any assistance from Equifax said, these issues “seem[] to be a big problem that might warrant some further investigation.”²⁹

II. Consumer Complaints about Incorrect Information on Credit Reports

As of March 7, 2018, the CFPB had received 7,454 complaints over incorrect information on consumer credit reports since Equifax announced the data breach in September 2017.³⁰

A consumer credit report includes identifying information for the consumer; information on consumer credit accounts, such as auto loans, mortgages, credit cards, and bank accounts; and a list of credit inquiries, often requests from lenders to obtain a copy of your credit report if you have applied for a loan. If a thief obtains a consumer’s information and successfully opens a new credit card in the consumer’s name, for example, that card and all the debt associated with it will appear on the victim’s credit report. If the thief applies for and successfully takes out a loan, the inquiry from the lender and the loan, along with all debt associated with it, will appear on the victim’s credit report. These are all forms of incorrect information on a consumer credit report.

In the aftermath of the Equifax breach, thousands of consumers filed complaints over incorrect information on their credit reports. In one such instance, a consumer reported disputing incorrect items “multiple times... regarding fraud[ulent] accounts and many inquiries” on their credit report.³¹ This consumer had learned that

their “information was part of the Equifax breach,” and despite filing a police report for thousands of dollars in false accounts listed on their credit report, still could not get this information removed.³²

Another consumer “tried to contact the company regarding [their] report numerous times,” after having their information “compromised during the Equifax breach.”³³ This consumer had “multiple inquiries” and “wrong information” on their report, and despite “multiple attempts and being transferred over 4 times,” was unable to get this information removed from their credit report.³⁴ Yet another consumer was able to get Equifax to remove incorrect information from their credit report, only to have the information “reinserted without [their] knowledge.”³⁵

The CFPB complaints over incorrect information on consumer credit reports demonstrate pervasive problems in the aftermath of the Equifax breach. Many of these consumers are frustrated with Equifax’s inability or unwillingness to help. One consumer spoke for many Americans: “This has gotten out of hand and has gone on too long. I need results!”³⁶

III. Consumer Complaints about Equifax’s Inadequate Assistance Resolving Problems After the Breach

As of March 7, 2018, the CFPB had received 3,312 complaints about Equifax’s inadequate or ineffective investigation into problems with credit reports since Equifax announced the data breach in September 2017.³⁷

After failing to notify consumers of the breach for more than a month, Equifax proceeded to adopt shoddy, unhelpful consumer support services, often leaving consumers confused and worse off than before they reached out. The company did not have an up-to-date crisis management plan, and it failed to follow those provisions it did have in place.³⁸ Victims of the breach were faced with an obstacle course riddled with frustrations, including difficulty reaching Equifax’s call centers and accessing their security freeze PINs.³⁹ Equifax directed consumers to a special website, EquifaxSecurity2017.com, that had major security vulnerabilities.⁴⁰

With thousands of consumers filing complaints with the CFPB over Equifax's behavior, it appears the company dropped the ball on the investigation and response into these questions. Nearly 3,000 complaints were filed reporting the company's inadequate or unhelpful investigations into problems facing consumers in the months after the breach.

In November, after calling and expressing their concerns to Equifax, one consumer filed a complaint because their "opportunity for employment ha[d] been denied because of [their] Equifax credit report."⁴¹ Despite reportedly proving that fraud had led to two fraudulent collections accounts being placed on their file, the consumer was rejected for employment after Equifax "re inserted" both fraudulent accounts onto their credit report.⁴² Another consumer sent "several ID theft affidavits," yet they still could not get Equifax to remove the fraudulent account from their credit report.⁴³

In December, one consumer summed up the problems of thousands of consumers, filing a claim that said, "I have been disputing erroneous items on my credit report with this credit bureau and they have not done a good job with investigating these errors...This credit bureau is hurting my chances for applying for loans to help with debt consolidation so I can provide for my children."⁴⁴ After putting consumer data at risk and failing to provide adequate support, Equifax has continued to injure consumers with shoddy or non-existent investigations into serious and systemic problems in the aftermath of the breach.

IV. Consumer Complaints about Fraud Alerts, Security Freezes, Credit Monitoring, or Identity Theft Support Services

As of March 7, 2018, the CFPB had received 1,711 complaints over problems with Equifax's fraud alerts, security freezes, credit monitoring, and identify theft support services since Equifax announced the data breach in September 2017.⁴⁵ This includes 1,089 complaints about problems with "Fraud Alerts or Security Freezes," and 622 complaints about problems with "Credit Monitoring or Identify Theft Protection Services."⁴⁶

Equifax set up enhanced alerts, security freezes, and credit monitoring after the breach – but appears to have done an ineffective job at implementing these protections. The company offered one year of free credit monitoring through its TrustedID Premier service, and it offered credit freezes, free through January 31, 2018.⁴⁷

But these services came with their own set of problems for consumers. Equifax initially forced consumers to pay for a freeze, before relenting to pressure to waive the cost in light of the breach.⁴⁸ The company also initially demanded that consumers relinquish their rights to sue the company if they enrolled in TrustedID Premier, and placed consumers into an account that would automatically renew and charge customers the full price of the service after one year.⁴⁹ Equifax changed both of these approaches after widespread consumer complaints.⁵⁰

But the problems with Equifax's services after the breach didn't stop there. In an attempt to unfreeze their account, one consumer "was redirected to call 6 different phone numbers."⁵¹ The consumer's finances were "frozen for over a month," causing them "extreme hardship."⁵²

For other consumers, the products and services have been inadequate. One consumer "attempted to sign up for the company's TrustedID Premier service," but was unable to do so.⁵³ The consumer filled out the form, "did not receive a confirmation email until 3 days later," and then when they went to register, the system told them they "had already registered."⁵⁴ Then the "site... froze."⁵⁵ The customer couldn't even figure out "whether [they had] been enrolled in the monitoring service."⁵⁶ Another "victim of [the] Equifax cybersecurity incident" had been unable to sign up for TrustedID Premier, despite trying "at least on 40 occasions" to do so, and contacting Equifax repeatedly.⁵⁷

V. Other Consumer Complaints

As of March 7, 2018, the CFPB had received almost 2,000 other complaints regarding a variety of other issues, some related to the breach, and others not. The complaints included attempts by Equifax to collect debts not owed, problems with written notification from Equifax, false statements or misrepresentation, fraud, and scam – since Equifax announced the data breach in September 2017.⁵⁸

These claims include one from a consumer who discovered a fraudulent inquiry on their report, and despite calling several times and speaking to three different representatives, still could not get the inquiry permanently deleted.⁵⁹ According to the consumer, Equifax removed the fraudulent information, only to return it to the report without notifying the consumer via mail or e-mail.⁶⁰

VI. Conclusion

The bottom-line is simple: consumers are reaching out to the CFPB to help them deal with Equifax-related problems at nearly twice the rate that they did before the recent data breach. Tens of thousands of consumers have reached out to the agency with their concerns, including claims of inept customer service, difficulty securing loans or buying houses after identity theft, and outright fraud. As part of its duty to consumers, the CFPB must continue a full-throated investigation into the Equifax breach, including the company’s response and its efforts to work with consumers to mitigate the harm and repair any damage.

The CFPB also must continue working with federal and state agencies to address critical cybersecurity issues in the credit reporting industry. The bureau must use all tools at its disposal, including subpoenas, sworn testimony, and investigative demands, to get to the bottom of the causes of the breach and the depths of Equifax’s failures to protect consumer data and respond adequately to the risks facing consumers. And the CFPB should accept help from other federal regulators who reach out to assist with any aspect of the investigation, including on-site bank examinations. The American people have used the CFPB’s complaint

process to make their voices heard, and right now, the agency appears to be ignoring those voices.

Congress must also act to reign in abuses in the credit reporting industry that continue to put consumers at risk. Congress should pass the SECURE Act, introduced by Senators Warren and Schatz in September 2017, which would make it easier for consumers to dispute and correct errors in their credit reports. In the six months since the data breach, more than 7,000 consumers filed complaints over incorrect information on their Equifax reports. The SECURE Act would help these consumers by increasing accountability for credit reporting agencies who willfully or negligently fail to fix incorrect information. The bill would also give consumers the right to receive all documentation from credit reporting agencies, and would give consumers access to an additional credit score free of charge.

Congress should also pass the Data Breach Prevention and Compensation Act of 2018, introduced by Senators Warren and Warner in January, which would require the Federal Trade Commission (FTC) to promulgate cybersecurity standards for credit reporting agencies and would impose strict penalties on companies like Equifax whenever they fail to adequately protect consumer data. This breach put nearly 150 million Americans at risk, and the litany of complaints in the CFPB’s database demonstrate that it has hampered their ability to secure loans, buy houses, and even get jobs. But the breach has barely put a dent in Equifax’s sky-high profits. This bill would force credit reporting agencies to adopt strict security measures to protect consumer data by imposing large penalties on any company that allows data to be accessed by unauthorized parties.

| Types of Complaints about Equifax | Number of Complaints |
|---|----------------------|
| Consumer Complaints about Improper Use of Credit Reports | 7,448 |
| Consumer Complaints about Incorrect Information on Credit Reports | 7,454 |
| Consumer Complaints about Equifax’s Inadequate Assistance Resolving Problems After the Breach | 3,312 |
| Consumer Complaints about Fraud Alerts, Security Freezes, Credit Monitoring, or Identity Theft Support Services | 1,711 |
| Other Consumer Complaints | 1,996 |
| Total Number of Complaints about Equifax | 21,921 |

Endnotes

- 1 “Equifax Announces Cybersecurity Incident Involving Consumer Information,” *Equifax* (Sept. 7, 2017) (online at <https://investor.equifax.com/news-and-events/news/2017/09-07-2017-213000628>).
- 2 “Bad Credit: Uncovering Equifax’s Failure to Protect Americans’ Personal Information,” *Elizabeth Warren* (February 2018) (available at https://www.warren.senate.gov/files/documents/2018_2_7_%20Equifax_Report.pdf).
- 3 Dodd-Frank Wall Street Reform and Consumer Protection Act, 12 U.S.C. § 5511(b)(2)
- 4 Defining Larger Participants of the Consumer Reporting Market, 12 C.F.R. § 1090.101
- 5 Director Cordray’s Letter to Senator Warren (Nov. 21, 2017).
- 6 *Id.*
- 7 *Id.*
- 8 *Id.*
- 9 *Id.*
- 10 Patrick Rucker, “Exclusive: U.S. consumer protection official puts Equifax probe on ice – sources,” *Reuters* (Feb. 5, 2018) (online at <https://www.reuters.com/article/us-usa-equifax-cfpb/exclusive-u-s-consumer-protection-official-puts-equifax-probe-on-ice-sources-idUSKBN1FP0IZ>).
- 11 *Id.*
- 12 Acting Director Mulvaney’s Letter to Senator Warren and colleagues (Feb. 16, 2018).
- 13 E-mail from Acting Director Mulvaney
- 14 *Id.*
- 15 Complaints rose from 11,252 to 20,276. “Consumer Complaint Database,” *CFPB* (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 16 For TransUnion, complaints rose from 10,722 to 12,271. For Experian, complaints rose from 10,486 to 12,952. “Consumer Complaint Database,” *CFPB* (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 17 “Consumer Complaint Database,” *CFPB* (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/27/2018.
- 18 “Consumer Complaint Database,” *CFPB* (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/27/2018.
- 19 “Consumer Complaint Database,” *CFPB* (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 20 15 U.S.C. § 1681(b)
- 21 “Consumer Complaint Database,” *CFPB* (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 22 “Consumer Complaint Database,” *CFPB* (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2754474>).
- 23 *Id.*
- 24 “Consumer Complaint Database,” *CFPB* (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2753596>).
- 25 *Id.*
- 26 “Consumer Complaint Database,” *CFPB* (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2752070>).
- 27 *Id.*
- 28 “Consumer Complaint Database,” *CFPB* (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2749212>).
- 29 “Consumer Complaint Database,” *CFPB* (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2751479>).

- 30 "Consumer Complaint Database," CFPB (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 31 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2778467>).
- 32 *Id.*
- 33 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2755713>).
- 34 *Id.*
- 35 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2755969>).
- 36 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2755713>).
- 37 "Consumer Complaint Database," CFPB (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 38 "Bad Credit: Uncovering Equifax's Failure to Protect Americans' Personal Information," Elizabeth Warren (February 2018) (available at https://www.warren.senate.gov/files/documents/2018_2_7_%20Equifax_Report.pdf).
- 39 *See id.*
- 40 *See id.*
- 41 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2717978>).
- 42 *Id.*
- 43 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2762072>).
- 44 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2755222>).
- 45 "Consumer Complaint Database," CFPB (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 46 *Id.*
- 47 "Bad Credit: Uncovering Equifax's Failure to Protect Americans' Personal Information," Elizabeth Warren (February 2018) (available at https://www.warren.senate.gov/files/documents/2018_2_7_%20Equifax_Report.pdf).
- 48 *See id.*
- 49 *See id.*
- 50 *See id.*
- 51 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2735137>).
- 52 *Id.*
- 53 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2682279>).
- 54 *Id.*
- 55 *Id.*
- 56 *Id.*
- 57 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2693702>).
- 58 "Consumer Complaint Database," CFPB (https://www.consumerfinance.gov/data-research/consumer-complaints/search/?from=0&searchField=all&searchText=&size=25&sort=created_date_desc). Accessed 3/7/2018.
- 59 "Consumer Complaint Database," CFPB (online at <https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/2661998>).
- 60 *Id.*