# Consumer Financial Protection Bureau v. Community Financial Services Association of America, Ltd. Amicus Brief of 90 State and Local Nonprofit Organizations

# **Amici Statements of Interest**

# Alabama Appleseed

The Alabama Appleseed Center for Law & Justice is a non-profit, non-partisan organization founded in 1999 whose mission is to work to achieve justice and equity for all Alabamians. Given that Alabama is one of the poorest states in the nation, Alabama Appleseed works with and advocates for many Alabamians who do not always enjoy stable financial positions, and who particularly depend upon strong consumer protections when it comes to credit and debt.

# <u>Alaska Public Interest Research Group</u>

AKPIRG is a non-partisan, non-profit organization that educates, advocates, and researches to protect Alaskan consumers. Without coordination between Alaska's state regulators and the Consumer Financial Protection Bureau (CFPB), many of Alaskan consumers' rights will become empty promises.

#### **Arkansas Community Organizations**

Arkansas Community Organizations is a membership organization of low- to moderate-income people in Arkansas and was involved in the 2010 effort to create the CFPB. We have used data and information from the CFPB in our efforts to end predatory practices by big corporations and financial institutions that harm low-income and majority Black communities in Arkansas.

## Casa of Oregon

CASA provides assistance throughout rural areas of Oregon to ensure farm workers and other marginalized populations have access to housing and financial services.

# CASH Campaign of Maryland

The CASH Campaign of Maryland (Creating Assets, Savings and Hope) promotes economic advancement for low-to-moderate income individuals and families in Baltimore and across Maryland. CASH accomplishes its mission through operating a portfolio of direct service programs, building organizational and field capacity, and leading policy and advocacy initiatives to strengthen family economic stability. The CFPB is a vital resource for the CASH Campaign of Maryland's work to increase the financial security of low-to-moderate-income individuals and families across the state.

#### Catholic Charities of Southern New Mexico

Catholic Charities of Southern New Mexico works to help meet the basic needs of individuals and families, address the root causes of poverty, eliminate oppression, and build a more just and compassionate society.

## Ceiba (Pennsylvania)

Ceiba's mission is to promote the economic development and financial inclusion of the Latino community through collaborations and advocacy aimed at ensuring their access to quality housing. Latinos are the fastest growing population of the country and at the same time is one of the communities facing some of the biggest challenges related to poverty and equitable access to financial products and related consumer protections. Latinos are also the largest limited English proficient (LEP) community in the US, putting them most at risk of misinformation, disinformation, and scams related to financial products. An independent and robust CFPB is very important to the Latino community.

#### Center for Survivor Agency and Justice (Multistate)

The Center for Survivor Agency and Justice is a national organization that advances economic equity for survivors of gender based violence. Our Consumer Rights for Domestic and Sexual Violence Survivors Project works with advocates, organizations, and states across the nation to enhance the economic and physical safety of survivors. The CFPB is critical to ensuring that survivors' rights are protected and enforced, removing barriers to their safety.

# Charlotte Center for Legal Advocacy

Charlotte Center for Legal Advocacy helps people in the Charlotte, North Carolina, region who cannot afford legal services, but desperately need them. Without legal representation in civil matters, thousands of families can lose access to financial security, healthcare, housing, and opportunity. We frequently help our consumer clients access the CFPB's complaint tool.

## Chicago Community Loan Fund

Chicago Community Loan Fund is an African American-led, mid-size Community Development Financial Institution that has served Chicagoland since 1991, specializing in bolstering access to affordable housing, commercial retail, community facilities, and social enterprises in low- to moderate-income (LMI) census tracts in this area. The CFPB's vital work to ensure that our customers do not fall victim to the predatory lending practices that continue to rob lower wealth communities of their resources necessitates that it remains independent of the political vicissitudes of the federal appropriations process. This approach is consistent with how other independent regulatory agencies are operationalized on the state level.

#### Children and Family Services, Corp. (Indiana)

At Children and Family Services, Corp., we offer nonprofit consulting services for improving organizations practices for planning and development. Our main areas of focus are strategic planning, annual reporting, grant writing, cost benefit analysis, and a specialized interest in de-implementation of outdated service modalities.

#### Consumer Federation of California

The Consumer Federation of California (CFC) is a nonprofit advocacy organization that, for the last 63 years, has been a powerful voice for consumer rights, campaigning for state and federal laws that place consumer protection ahead of corporate profit. CFC regularly engages with the California legislature and also participates in national coalitions on critical consumer protection issues. CFC works regularly with the CFPB and appreciates the CFPB's expertise and critical mission to protect consumers in a myriad of ways.

#### Consumers Council of Missouri

Consumers Council of Missouri educates consumers statewide and advocates for their collective interests through leadership and partnerships on issues such as utility rates, health care access, personal finance. We collaborate with other nonprofits in Missouri to ensure that banks are not excluding low-and moderate-income and majority-minority communities from their banking and lending practices.

# Consumers for Auto Reliability and Safety Foundation (California)

The Consumers for Auto Reliability and Safety (CARS) Foundation prevents motor vehicle-related fatalities, injuries, and economic losses through education, outreach, and aid to victims and surviving family members, and related activities. Vehicle affordability is crucial for ensuring that consumers—particularly vulnerable, high-risk individuals and their families—have access to proven, advanced safety technologies, and the CARS Foundation has long supported the CFPB's mission to stop predatory lending in order to curb harmful, abusive, illegal, and discriminatory practices.

# Delaware Community Reinvestment Action Council

The Delaware Community Reinvestment Action Council, Inc., a Delaware nonprofit founded in 1987, seeks to ensure every Delawarean has equal and equitable access to resources and high-quality services they need to build financial stability, accrue generational wealth, and participate in mainstream banking and legal systems. We need a strong and independent CFPB to help us realize the promise of an accessible, community-centric financial system.

# DevNW (Oregon)

DevNW provides financial and housing counseling across a seven-county region to support Oregonians in gaining financial stability and building assets. DevNW's professional staff regularly utilize the CFPB's consumer education materials in classes and counseling sessions, engage with its complaint process to flag concerning trends and ensure Oregonians seeking support can engage directly with DevNW for support through their help tools.

# Economic Action Maryland

Economic Action Maryland is a statewide, nonprofit organization founded by consumer advocates in 2000. Economic Action Maryland champions economic rights and housing justice through research, education, advocacy, and direct service. Our 10,000 supporters press for systemic policy change on a wide range of consumer protection and economic rights issues including debt collection, high-cost lending, unfair and deceptive practices, and more. We provide clients with advice, education, and assistance on tenant-related issues, fair housing, fraud prevention, digital privacy, tax credits, and more.

## Fifth Avenue Committee (New York)

Fifth Avenue Committee (FAC) is a 45-year-old nonprofit comprehensive community development corporation, NeighborWorks America and Hispanic Federation member based in Brooklyn, NY whose mission is to advance economic, social and racial justice in NYC. FAC serves over 5,500 low- and moderate-income New Yorkers annually through a range of programs that include affordable housing, adult education, benefits access and financial coaching, workforce development and tenant and community organizing and advocacy.

#### Florida Consumer Action Network

The Florida Consumer Action Network has been the voice for Florida consumers for over three decades, ensuring they are protected from unfair and unscrupulous tactics. The CFPB is a critical agency at the national level to even the playing field.

## FreeFrom (California)

FreeFrom is a national nonprofit based in Los Angeles, California, creating pathways to financial security and long-term safety for survivors of intimate partner violence. We envision a world where survivors have sustaining income, savings and credit with which to build wealth and the resources to support individual, intergenerational and community healing—enabling them to thrive. We're building an ecosystem in which survivors can thrive through the use of data, technology, peer-to-peer networks, training programs for shelters, policy advocacy, social enterprise models and cross-sector solutions.

# Gateway CDC (North Carolina)

Gateway CDC is a community development corporation doing small business technical assistance and enterprise development for small businesses as well as affordable housing. The CFPB and all of its services and enforcement are key to an American environment that supports the enterprise development, job creation, affordable housing and neighborhood revitalization that is the core of our work.

## <u>Greenlining Institute (California)</u>

The Greenlining Institute is based in Oakland, CA and its mission is to combat the effects of redlining by addressing economic and climate challenges in low-income communities and communities of color. Greenlining works alongside a coalition of over 40 grassroots, community-based organizations to bring investments and accessible financial services in communities of color. Since its inception the CFPB has ensured that the most vulnerable communities such as non native English speakers, low-income communities, and communities of color have fair and equal access to financial services. Greenlining supports the CFPB's work and its mission and believes its vital to our communities overall financial health and financial security.

#### Home Ownership Center of Greater Cincinnati (Ohio)

The Home Ownership Center of Greater Cincinnati promotes and provides personal financial management skill development to families in greater Cincinnati. This skill development includes knowledge of the protections available to them if they fall victim to the unscrupulous. The CFPB has proven to be a critical component to the consumer protection presentation. Our experience over the many referrals to the Bureau is surprise over the existence of such a service from the federal government that leads to excellent results from the engagement. This was especially true during the initial years of the Bureau's work. Over time the significance of the Bureau will continue to grow.

## HomesteadCS (Indiana)

HomesteadCS is a non-profit HUD-certified Housing Counseling Agency offering Education and Consulting Assistance to all homeowners and potential homeowners regardless of income, as well as a CDFI. Our agency is certified by the State of

Indiana to offer HomeBuyer Counseling, Education, and Foreclosure Prevention Counseling.

# Hoosiers for Responsible Lending (Indiana)

Hoosiers for Responsible Lending is a statewide coalition in Indiana that fights to put an end to loans that target and trap vulnerable Hoosiers—extracting wealth from them and their communities. Hoosiers for Responsible Lending uses education and advocacy to support improved access to credit and strong consumer protection guardrails around alternative financial services that require transparency and limit what lenders can charge.

#### **Housing Action Illinois**

Housing Action Illinois' mission is to protect and expand the availability of quality, affordable housing in Illinois. Housing Action engages more than 160 member organizations across Illinois' housing sector to advocate for resources and equitable policies and to build the field's capacity to end homelessness, address the shortage of affordable rental housing, and expand sustainable homeownership opportunities for all Illinoisans, especially those with the lowest incomes. Ensuring strong enforcement of consumer protection laws on the state and federal levels is critical for Illinois residents and their ability to obtain and sustain quality, affordable homes.

#### Indiana Black Expo, Inc

Indiana Black Expo, Inc. is an effective voice & vehicle for the social and economic advancement of African American youth & families. IBE celebrates cultural diversity and inclusiveness across all races, ethnicities, nationalities, generations, socioeconomic levels and religious affiliations. We continue to strive for excellence by providing unique events and programs that reflect the changing landscape of Indiana and the world.

#### <u>Indiana Community Action Poverty Institute</u>

The Indiana Community Action Poverty Institute engages in research and promotes public policies to help Hoosiers achieve and maintain financial well-being. We are a program of the Indiana Community Action Association. Hoosiers need a strong,

independent CFPB to provide a safe and equitable financial services marketplace and to prevent unfair or deceptive practices that drain households' finances.

# Indianapolis Urban League

The mission of the Indianapolis Urban League is to empower African-Americans and disadvantaged individuals to achieve social and economic equality and improved quality of living through programs, services, and advocacy in education, workforce development, entrepreneurship, health, and housing.

# Kentucky Equal Justice

The Kentucky Equal Justice Center is a statewide, nonprofit law firm and advocacy organization. It works alongside low-income Kentuckians directly impacted by unfair markets and exploitative business practices by representing them in court and seeking greater protections for consumers through legislative and regulatory advocacy.

# Legal Aid Chicago

Legal Aid Chicago is a non-profit organization providing free legal representation and counsel to disadvantaged people and communities throughout Cook County, Illinois. Each year advocates at Legal Aid Chicago represent thousands of clients who live in poverty, or are otherwise vulnerable, in a wide range of civil legal matters. Legal Aid Chicago's areas of practice include bankruptcy and consumer law, as well as family, employment, housing, and public benefits. The CFPB's regulatory and enforcement actions directly align with our client's needs and support our clients by addressing the obstacles they confront as low income consumers. We have relied on CFPB regulations repeatedly in representing our clients. Additionally, some clients have had their cases successfully resolved after filing complaints with the CFPB.

#### Legal Aid Justice Center (Virginia)

The Legal Aid Justice Center is a Virginia-based organization that partners with communities and clients to achieve justice by dismantling systems that create and perpetuate poverty. LAJC provides legal advice and direct legal representation each year to thousands of low-income individuals who cannot afford private counsel in

civil practice areas such as consumer protection, landlord-tenant, employment, immigration, and civil rights. The Center's interest in this appeal flows from its decades-long history of representing low-income consumers who have been subjected to the abuses that the CFPB guards against.

# Long Beach Gray Panthers (California)

The Long Beach Gray Panthers is a nonprofit organization dedicated to education, advocacy, community, and peace for all ages. The Long Beach Gray Panthers appreciate the valuable work the CFPB is doing to protect consumers. Older Adults need more protection from predatory lenders and scammers, not less.

#### The Maine Center for Economic Policy

The Maine Center for Economic Policy provides citizens, policymakers, advocates, and media with credible and rigorous economic analysis that advances economic justice and prosperity for all Maine people.

#### Manufactured Home Owners Association of New Jersey

The Manufactured Home Owners Association of New Jersey was founded to protect and strengthen manufactured housing communities, protect and ensure the rights of manufactured homeowners, and dispel through education the misconceptions and myths held by the public, media, and government officials concerning manufactured housing, its owners, and residents. MHOA-NJ believes that the CFPB is vital in protecting the rights of consumers who reside in manufactured housing through its educational and protection resources.

#### Military / Veterans Coalition of Indiana

The Military / Veterans Coalition of Indiana's mission is to promote the needs of the military community of Indiana including Active, National Guard, Reserve, retirees, and their families.

# Mountain State Justice (West Virginia)

Mountain State Justice is a nonprofit legal services and advocacy organization fighting for low-income West Virginians. The CFPB plays a critical role in our work protecting West Virginia consumers.

# Neighbors Helping Neighbors (New York)

Neighbors Helping Neighbors promotes racial justice while empowering low- and moderate-income New Yorkers to fight for, secure and maintain quality housing and build financial assets. NHN was founded in 1990, is a nonprofit HUD certified housing counseling agency based in Brooklyn, New York, and is an affiliate of the Fifth Avenue Committee.

#### New Economy Project (New York)

New Economy Project works with community groups and low-income New Yorkers to promote economic justice and to eliminate unfair and discriminatory economic practices that perpetuate inequality and poverty. We advocated for the creation of the CFPB and have worked with the agency, for example, to press for vital rulemaking and enforcement actions to combat predatory lending and the extraction of wealth from New York City's low-income neighborhoods and neighborhoods of color.

#### New Jersey Appleseed Public Interest Law Center

New Jersey Appleseed is a nonprofit public interest law center dedicated to advancing justice and opportunities for low-income people and working families. We are involved in consumer financial justice issues as part of our Government and Corporate Accountability work, and have a special interest in the federal government in setting up a CFPB that is independent and able to function relatively free from partisan interference.

#### New Jersey Citizen Action

New Jersey Citizen Action is a statewide coalition and grassroots organization that fights for social, racial, and economic justice for all. A nonprofit organization founded in 1982, NJCA combines political advocacy, electoral campaigns, public

outreach, and community empowerment programs to make a real difference in the lives of everyday New Jerseyans. With this comprehensive approach, the organization addresses systemic and institutional issues as well as the pressing needs and interests of low- and moderate-income individuals across the state.

# New Yorkers for Responsible Lending

New Yorkers for Responsible Lending (NYRL), a statewide coalition of 160 organizations, promotes economic justice as a matter of racial and community equity through legislative and policy advocacy, popular education, media advocacy, and organizing campaigns. NYRL works to protect consumers on the wide range of financial products overseen by CFPB, including mortgages, consumer and auto loans, and student loans.

## Northwest Justice Project (Washington)

The Northwest Justice Project is a not-for-profit organization that provides civil legal services to low-income people throughout the state of Washington to address fundamental needs such as housing, family safety, income security, health care, education and more. In 2022 alone, NJP provided legal assistance to thousands of low-income Washingtonians many of whom were facing consumer, housing, debt collection and other issues congruent with the mission of the CFPB. NJP directly engages with the CFPB and regularly directs clients and members of the public to the vast consumer resources published by the CFPB.

## OneJustice (California)

One-Justice strengthens the legal services sector's expertise and capacity to advance justice and equity. One-Justice is working with consumer law legal services projects across the state to ensure low-income Californians have better access to assistance with their consumer legal issues and increased consumer protections overall, including through advocacy with the CFPB and the California state regulatory agencies.

#### <u>Oregon Consumer Justice</u>

Oregon Consumer Justice (OCJ) is a nonprofit consumer advocacy organization advancing a justice movement that puts people first, ensuring all can live with

dignity, good health, joy, and economic opportunities. OCJ relies on CFPB resources and engages with the agency's critical regulatory efforts.

# Oregon Consumer League

The Oregon Consumer League has worked to protect consumer rights since 1967. We work to educate consumers, promote fair and ethical business practices, and to advance consumer protection in Oregon. The CFPB's educational materials. outreach efforts, and protection of consumer rights are essential to the mission of the Oregon Consumer League.

## Pacific Community Ventures (California)

Pacific Community Ventures, a nonprofit located in Oakland, California is a community impact investor that supports small business owners and their communities in the fight for economic, racial, and gender justice, while combining an integrated impact-first Restorative Capital and Pro Bono Business Advising with our Good Jobs Innovation Lab that propels thriving communities with equitable jobs.

#### Prosperity Indiana

The Indiana Association for Community Economic Development d/b/a Prosperity Indiana is a statewide membership organization for the individuals and organizations strengthening Hoosier communities with more than 200 members from the public, private, and nonprofit sectors. Prosperity Indiana seeks ways to fund members' work, build and retain relationships, and address local and national issues that impact the capacity and potential for member organizations to deliver services and lead change in their communities.

#### Public Counsel (California)

Public Counsel is a nonprofit public interest law firm dedicated to advancing civil rights and racial and economic justice, as well as to amplifying the power of our clients through comprehensive legal advocacy. Founded on and strengthened by a pro bono legal service model, our staff and volunteers seek justice through direct legal services, promote healthy and resilient communities through education and outreach, and support community-led efforts to transform unjust systems through

litigation and policy advocacy in and beyond Los Angeles. Our Consumer Rights & Economic Justice team regularly assists low-income clients facing collections on default judgements based on lawsuits where they had not been served.

#### Public Interest Research Groups

The state Public Interest Research Groups are independent, non-partisan, nonprofit organizations working for consumers and the public interest. The state PIRGs supported the CFPB's creation, arguing for a robust, independent federal agency whose sole mission is to protect consumers from harmful financial products and services. The following state Public Interest Research Groups join as *amici curiae*.

Arizona PIRG, Inc.

California Public Interest Research Group, Inc.

Colorado Public Interest Research Group, Inc.

ConnPIRG Citizen Lobby, Inc. (Connecticut)

Georgia Public Interest Research Group, Inc.

Illinois State Public Interest Research Group, Inc.

MaryPIRG Citizen Lobby, Inc. (Maryland)

Massachusetts Public Interest Research Group, Inc.

MoPIRG Citizen Organization, Inc. (Missouri)

New Jersey Public Interest Research Group Citizen Lobby, Inc.

New Mexico Public Interest Research Group Fund, Inc.

North Carolina Public Interest Research Group Citizen Lobby, Inc.

Ohio PIRG Citizen Lobby, Inc.

Oregon State Public Interest Research Group, Inc.

Pennsylvania Public Interest Research Group, Inc.

PIRGIM Public Interest Lobby, Inc. (Michigan)

 $Texas\ Public\ Interest\ Research\ Group,\ Inc.$ 

Washington State Public Interest Research Group, Inc.

Wisconsin Public Interest Research Group, Inc.

# Public Justice Center (Maryland)

The Public Justice Center is a Maryland-based non-profit civil rights and antipoverty legal organization established in 1985. Adopting a racial equity lens, the PJC uses impact litigation, public education, and legislative advocacy to accomplish law reform for its clients. The organization has a longstanding commitment to

protecting the rights of low-income consumers, including health care consumers, homeowners and renters. In this case, the PJC has an interest in protecting the relative independence of the CFPB as a critical bulwark against a wide range of predatory practices in consumer transactions.

# REBOUND (Kentucky)

REBOUND, Inc is a nonprofit community housing development organization that promotes community development, expands opportunities and improves stability in low-income and vulnerable families.

## South Carolina Appleseed Legal Justice Center

SC Appleseed works with low and moderate income consumers to ensure that state and federal protections afforded by the law are enforced. Our work includes referrals and consultation with the CFPB remains a strong and independent agency that is focused on working on behalf of our constituencies.

#### South Dallas Fair Park Inner City CDC

South Dallas/Fair Park Inner City Community Development Corporation is a community-based nonprofit with a mission to create vibrant, stable, and safe South Dallas Fair Park neighborhoods by building partnerships that provide homeownership, economic development, workforce training, community education, and advocacy, all under one comprehensive umbrella of holistic community development services. The work of CFPB is crucial to our neighbors' pathway to financial stability and ownership.

# Southwest Center for Economic Integrity (Arizona)

The Southwest Center for Economic Integrity, a nonprofit based in Arizona, works to build economically strong communities for all and oppose unfair corporate and government practices. The Center regularly engages with state agencies, other state and local non-profits, and federal agencies including the CFPB as part of our mission of challenging head on policies and powerful industries that profit excessively on the backs of workers, consumers, children, and families.

# Statewide Poverty Action Network (Washington)

The Statewide Poverty Action Network advances community-sourced, equitable public policy solutions for people with low incomes in Washington state. Issue areas include the state safety net, tax reform, and consumer protections around fringe financial services, such as payday lenders, subprime mortgage lenders, and debt collectors. At both the state and federal level, Poverty Action depends on the work of independently funded regulatory agencies to protect vulnerable community members from predatory products, practices, and services.

#### Tennessee Justice Center

The Tennessee Justice Center is a nonprofit, public interest law firm established by Tennessee bar leaders in 1996 to advocate for low-income Tennesseans in matters involving economic justice.

#### Texas Appleseed

Texas Appleseed is a nonprofit, non-partisan public interest justice center that promotes social, economic, and racial justice for all Texans, with a focus on consumer protection, as well as other policy areas. We regularly use the CFPB's education, research, and information resources and have actively engaged in multiple CFPB rulemakings, highlighting the experience of Texans.

#### Texas RioGrande Legal Aid

Texas RioGrande Legal Aid is the second largest provider of free legal services in the country, providing services to low-income residents in 68 counties throughout South and West Texas. TRLA's clients frequently fall victim to unlawful, unfair, deceptive, or abusive practices across a wide spectrum of consumer activities, such as predatory lending, unfair debt collection, deceptive motor vehicle loans and excessive banking and other fees. TRLA routinely relies on and refers clients to both the CFPB and its state counterparts (such as the Texas Office of the Consumer Credit Commissioner and the Consumer Protection Division of the Office of the Attorney General) for the filing of consumer complaints, and also relies on the agencies' data and educational materials.

## The African American Alliance of CDFI CEOs (Multistate)

The African American Alliance of CDFI CEOs is a national membership-based organization with a mission to empower Black communities by promoting economic stability, wellbeing, and wealth. Leveraging a network of 77 Black-led Community Development Financial Institutions (CDFIs), the Alliance is working towards establishing power and promoting equal economic opportunity for Black individuals, families, and communities across all 50 states. As a proponent of economic fairness and equality, the Alliance recognizes the critical role of independent regulatory bodies, like the CFPB, in ensuring impartial treatment for all consumers, particularly those historically excluded or marginalized in finance.

# The Brazos Valley Financial Fitness Center (Texas)

We work, for free, with any low-income people that are trying to get off Government assistance within a seven-county area. The CFPB has been a crucial part of our process.

#### The Middleburg Institute (Louisiana)

The Middleburg Institute is a nonpartisan charitable organization that seeks to raise the economic, educational and social level of families in low to moderate income communities in Louisiana. Under our banner is a statewide coalition that includes over 45 lead organizations and brings together community, business leaders and policy makers. The Institute seeks to influence changes in public policies and programs by facilitating grassroots advocacy, convenings, information dissemination, and access to entrepreneurial, public, and private asset-building and wealth creation programs for people in the BIPOC and A.L.I.C.E. communities.

#### The One Less Foundation (Pennsylvania)

The One Less Foundation works to help families and communities create paths out of poverty through a two-generation approach. We are dedicated to alleviating poverty by providing financial literacy and capability, supplemental education, and personal mentoring to individuals, families and communities to help them gain the skills needed to create a path out of poverty. The work of the CFPB is an essential tool to helping us combat poverty as it has helped create regulation to prevent predatory financial products, provides an avenue to report, receive follow up and

remedy financial bad actors, and provides protection to consumers who are most vulnerable to being taken advantage of by various financial institutions.

## Tzedek DC

Tzedek DC's name is drawn from the ancient Jewish teaching "Tzedek, tzedek tirdof," or "Justice, justice you shall pursue." Headquartered at the University of the District of Columbia David A. Clarke School of Law, Tzedek DC's mission is to safeguard the legal rights and financial health of DC residents with lower incomes facing the often-devastating consequences of debt collection and credit-related obstacles. Tzedek DC and its client communities have a substantial interest in the CFPB's continued, robust work: since the CFPB's creation, DC's residents have filed more complaints per capita with the Bureau than those of any state in the nation.

#### United Way of Metropolitan Dallas

United Way of Metropolitan Dallas is a social change organization that unites North Texas together to achieve strategic goals in the areas of education, income and health. UWMD and its partners use CFPB's data and research to help us develop and message new initiatives, and we share their resource pages with those in need, including instructions on submitting a complaint on a financial product or service.

#### Urban Land Conservancy (Colorado)

Urban Land Conservancy is a nonprofit real estate company based in Denver, Colorado. Since 2003, ULC has been committed to securing the future of communities in Metro Denver and beyond by preserving, developing, stewarding, and managing permanently affordable housing and commercial real estate for nonprofits and mission-minded organizations.

#### Virginia Citizens Consumer Council

A statewide volunteer individual membership organization of citizens concerned about consumer pocketbook issues, VCCC has long worked on issues related to the CFPB, predatory lending, etc. We believe the CFPB is the most important consumer agency created in decades because we know what it was like for consumers when its authority was spread across many agencies that all had other top priorities.

# Virginia Organizing

Virginia Organizing is a 28-year old statewide, grassroots organization led by directly-affected members around the state. Our members have worked to fight predatory lending practices for over two decades because many of them are dealing with the negative results of such practices everyday. We worked to get the CFPB started and have benefited from the work of the CFPB ever since.

#### Virginia Poverty Law Center

The Virginia Poverty Law Center uses advocacy, education, and litigation to break down systemic barriers that keep low-income Virginians in the cycle of poverty. We work closely with the CFPB to help our clients avoid and escape economic exploitation.

# Voices Organized in Civic Engagement (VOICE) (Oklahoma)

Voices Organized in Civic Engagement (VOICE) is an Oklahoma-based coalition of faith-based and civic institutions that work together for the common good of our members and our communities. The materials and rules that the CFPB provides are essential in our work to understand issues affecting people in our state and to educate Oklahomans on a variety of economic justice issues.

#### William E. Morris Institute for Justice (Arizona)

The William E. Morris Institute for Justice ("MIJ") is an Arizona non-profit organization dedicated to advancing and protecting the most basic civil and human rights of low-income Arizonans and other Arizonans in historically marginalized communities. MIJ prioritizes advocacy on systemic issues affecting economically vulnerable Arizonans, including access to justice, consumer protection, economic security, fair access to public programs and services, food security, health care equity, housing stability, and personal safety.

#### Woodstock Institute (Illinois)

Woodstock Institute advances economic justice and racial equity within financial systems through research and advocacy at the local, state, and national levels. The CFPB establishes and enforces rules of the road that are a critical part of our

regulatory ecosystem. Undermining the CFPB would create critical gaps in the protections currently enjoyed by residents in the various states, including our home state of Illinois.