What CFPB enforcement history reveals about future priorities

August 2026

In this paper, we examine trends in Consumer Financial Protection Bureau (CFPB) enforcement actions since the agency's founding in July 2011, including changes in enforcement volume over time, the consumer products involved, and the top enforcement action foci. We examine the enforcement activity under each of the six directors who served the CFPB since its inception and the civil money penalties collected by fiscal year.[1] In June 2026, former Deputy Director Brian Johnson was nominated as the new director of the CFPB, and in light of this nomination, we also review the enforcement actions taken by the CFPB while he was deputy director.[2]

Key takeaways

- The number of enforcement actions undertaken by the CFPB has fluctuated over time and tends to be at its lowest at the start of a new presidential administration.
- CFPB actions also have an inherent lag: each enforcement action typically focuses on alleged activities that occurred 1.5 to 6 years prior to the action being filed. In 80% of the actions the alleged activity started four or more years prior.
- During the time when Brian Johnson was deputy director, the CFPB pursued 34 enforcement actions and collected over $131 million in civil penalties. These included enforcement actions against student and auto loan servicers, payday lenders, banks, and mortgage lenders, among others.
- Over time, the focus of the actions has also varied. For example, mortgage lending has been a constant topic, while actions focusing on deposits have become more common in recent years.
- There is a wide range in civil money penalties collected each year and on any given matter. The average amount is $268 million. The median amount, which is less sensitive to outliers, is $131 million.

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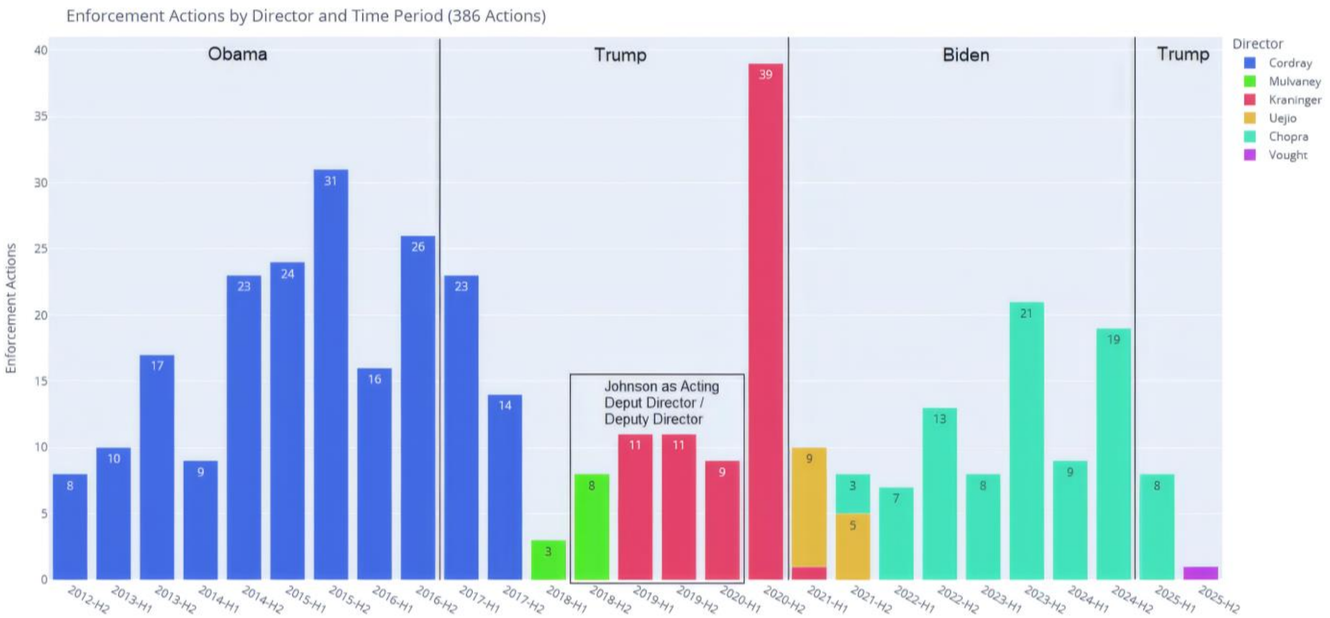
1 Acting directors that did not preside over any enforcement actions were not included.

2 Johnson was acting deputy director from July 2018 until May 2019, and was deputy director from May 2019 until March 2020. For the purposes of this CRA Insight, we include both of these periods when referring to his time as "Deputy director."

CFPB enforcement actions over time[3]

Figure 1: Number of CFPB enforcement actions by filing date



The agency filed its first enforcement actions on July 18, 2012. As demonstrated in the chart above illustrating the number of enforcement actions by filing date, there was a clear increase in enforcement activity as the agency grew under Director Richard Cordray.[4] Following each change in administration and subsequent turnover in CFPB director, we see a decline in actions as the agency is reoriented in a new direction, followed by a subsequent increase in enforcement actions.

In the first Trump administration, Cordray remained director of the CFPB for the first year, with the number of actions declining (23 in 2017-H1 and 14 in 2017-H2). After Mick Mulvaney became acting director, the number of enforcement actions bottomed out at three in 2018-H1 and then increased to eight in 2018-H2. CFPB activity increased again after Kathleen Kraninger was confirmed as director in late 2018. Under Director Kraninger, CFPB actions peaked in 2020-H2, with 39 separate actions taken. After the Biden administration took office, enforcement actions dropped again under acting Director David Uejio and after the start of Director Rohit Chopra's tenure. As Chopra settled into the role, the number of actions taken by the CFPB increased. With the inauguration of the second Trump administration, the number of enforcement actions once again dropped, with only one action taken under acting Director Russell Vought.[5]

On June 10, 2026, President Trump nominated former deputy director of the CFPB Brian Johnson as the Bureau's next director. Johnson began working at the CFPB in December 2017 as a senior advisor to the director. In July 2018 he became the acting deputy director and in May 2019 he became the deputy director

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[3] Enforcement actions are only one of many tools that the Bureau uses to ensure compliance and assist consumers, so looking at enforcement actions alone may not give a full picture of the CFPB's priorities or activities. However, unlike some other potential measures, these actions are publicly available.

[4] We used the Python programming language to scrape the CFPB's list of enforcement actions from its website to obtain the date filed, category, institution type, and focus/topic. Available at **https://www.consumerfinance.gov/enforcement/actions/**, last accessed May 5, 2026.

[5] All but one of the eight actions taken in 2025-H1 under Director Chopra occurred prior to President Trump's inauguration.

under Director Kraninger. He left the CFPB in March 2020.[6] While Johnson was deputy director, the CFPB undertook 34 enforcement actions, four of which involved banks and one involved a mortgage lender.

There are indications that the CFPB intends to resume supervisory exams and potentially some dormant enforcement investigations, while also shifting its broader approach to enforcement.[7] In June 2026, the CFPB met with officials at Bilt, a fintech company, to discuss remediation of borrowers harmed by transaction fees that occurred during Bilt's transition to a new bank partner. After these discussions, the CFPB announced that Bilt would take steps to resolve the issue and reimburse customers, with the CFPB monitoring Bilt's efforts.[8] This approach follows the CFPB's new guiding enforcement principles:[9]

1. **Addressing Actual Harm to Consumers:** The CFPB plans to focus on activities that violate the law and cause "real and meaningful harm to consumers," and not in cases where consumers made "unwise decisions" or where the harm is theoretical.
2. **Due Process:** The CFPB will conduct enforcement actions rooted in its statutory authority.
3. **Collaboration:** The CFPB will encourage institutions to pro-actively report violations to the Bureau and will work with the institution to address the issue and remediate borrowers.
4. **Efficiency:** The CFPB will not undertake actions that overlap with the work of the states or of other regulators.

These principles, and the recent press releases with Bilt, may indicate what the CFPB's activity will look like over the next few years. Although, it remains to be seen how Johnson, if confirmed as the new CFPB director, will apply these principles and how the CFPB will change under his leadership.

Timing of enforcement actions and alleged activity

The filing of enforcement actions represents the culmination of a lengthy investigation. As a result, the activity that precipitated an action often began years prior to the public filing. CRA reviewed the 255 enforcement actions taken since the start of 2016 and, based on the publicly available court documents, identified the length of time between when the alleged actions occurred and the initial file date.[10] We found that, on average, the alleged activity began 69 months prior to the initial enforcement action file date – nearly six years prior. The chart below presents a scatterplot of actions since 2016, showing the length of time from the alleged activity to the initial file date.

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6 Based on Brian Johnson's LinkedIn profile, **https://www.linkedin.com/in/bcjpgp/**, last accessed July 24, 2026.

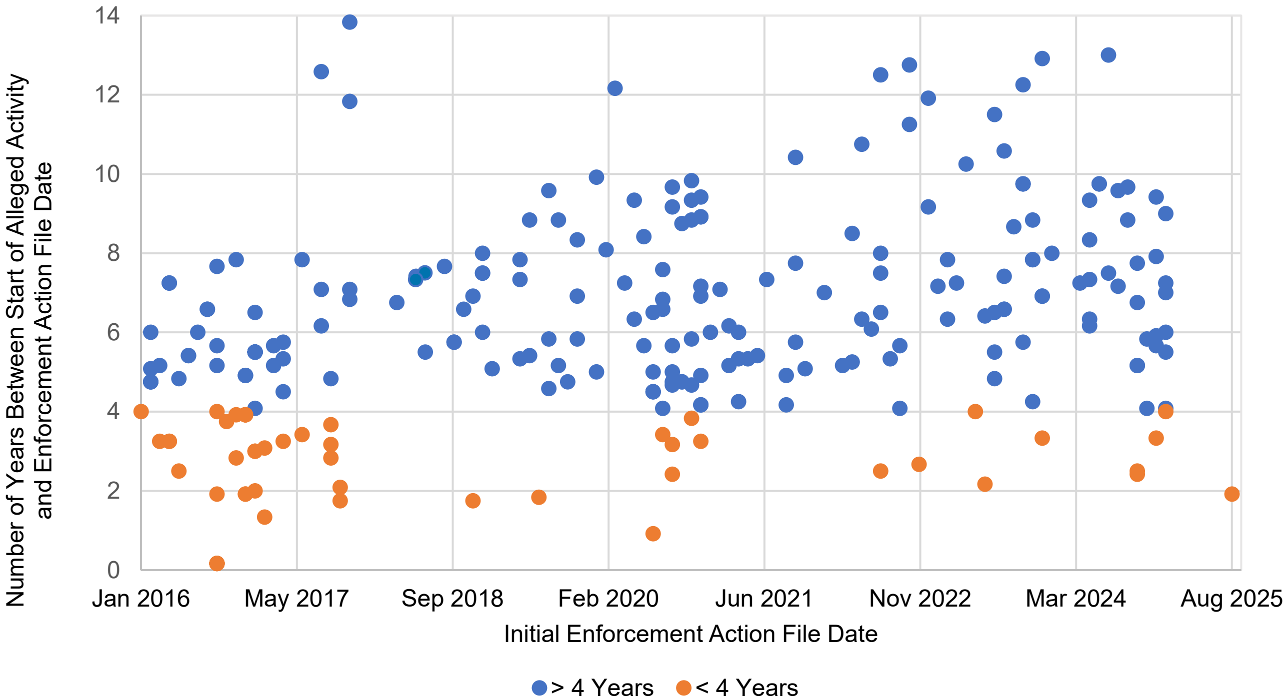
7 "Signs of Life at the CFPB," *The Consumer Finance Podcast*, Troutman Pepper Locke. February 26, 2026. **https://www.troutman.com/insights/signs-of-life-at-the-cfpb/**

8 "The CFPB Works to Ensure Bilt Consumers are Made Whole," *CFPB Newsroom*. June 2, 2026. **https://www.consumerfinance.gov/about-us/newsroom/the-cfpb-works-to-ensure-bilt-consumers-are-made-whole/**

9 See **https://www.consumerfinance.gov/enforcement/enforcement-principles/**

10 In multiple cases, the dates of the alleged actions as listed in the court documents are vague. When only a year was provided, we assigned the activity date to January of that year. We used the earliest alleged action when multiple actions with multiple time frames were present. Additionally, nine enforcement actions did not clearly identify when the alleged activity took place in the publicly available documents; these actions are excluded from these statistics.

Figure 2: Time between alleged activity and enforcement action filing



Of the 255 actions that occurred since January 2016, 51 (20%) involved alleged activity that first occurred less than four years prior to the enforcement action. The remainder involved activity that first occurred more than four years prior to the enforcement action, with half of those actions involving activity that occurred 79 months or more prior to the enforcement action.

A review of several relatively recent actions, all involving mortgage lending, may be illustrative:

- Action filed against a bank in July 2022 for redlining allegations covering 2015 to 2019 in Philadelphia.[11] The bank paid $4 million in civil penalties.
- Action filed against a bank in October 2021 for redlining allegations covering 2014 to 2018 in Memphis.[12] The bank paid $4 million in civil penalties.
- Action filed against a bank in November 2023 for allegations of discriminatory underwriting practices occurring between 2015 and 2021.[13] The bank paid $24.5 million in civil penalties.
- Action filed against a bank in November 2023 for allegations of failing to accurately correct and report applicant GMI information in the bank's HMDA filings between 2016 and 2020.[14] The bank paid $12 million in civil penalties.
- Action filed against a mortgage lender in October 2024 for allegations of redlining in Birmingham covering 2018 to 2022.[15] The lender paid $1.9 million in civil penalties.

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[11] https://www.consumerfinance.gov/enforcement/actions/trustmark-national-bank/

[12] https://www.consumerfinance.gov/enforcement/actions/trident-mortgage-company-lp/

[13] https://www.consumerfinance.gov/enforcement/actions/citibank-n-a/

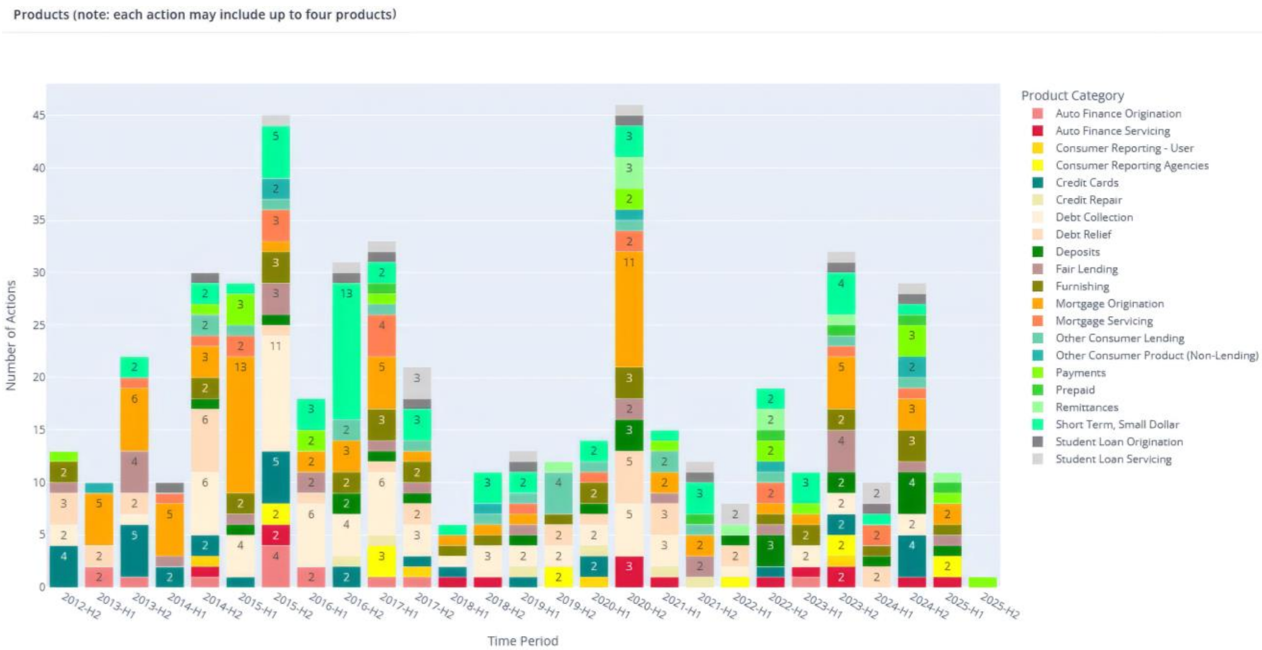
[14] https://www.consumerfinance.gov/enforcement/actions/bank-of-america-na-hmda-data-2023/

[15] https://www.consumerfinance.gov/enforcement/actions/fairway-independent-mortgage-corporation/

In each of these cases, the CFPB filed its enforcement action between six and eight years after the alleged action initially took place. Lenders need to be aware that fair lending issues arising from activity during this period of reduced enforcement activity could still lead to CFPB enforcement action in the future. This highlights the need for continued monitoring and preemptive action.

Enforcement actions by product category

Figure 3: Enforcement action product categories by filing date



With each enforcement action filed, the CFPB identifies which product or products (up to four) were the subjects of the CFPB's complaint. Overall, mortgages and small-dollar lending have remained frequent subjects of CFPB enforcement actions. By contrast, debt collection and debt relief actions have become less common, while deposit-related actions increased slightly during Director Chopra's tenure.

Figure 4: Top foci in enforcement actions

Cordray *(201 Actions)*	**Mulvaney** *(11 Actions)*	**Kraninger** *(71 Actions)*	**Uejio** *(14 Actions)*	**Chopra** *(88 Actions)*	**Vought** *(1 Action)*
Mortgages	Debt collection	Mortgages	Debt collection	Mortgages	Payments
Debt collection	Short-term, small-dollar	Debt collection	Debt relief	Short-term, small-dollar	
Short-term, small-dollar	Mortgages	Debt relief	Short-term, small-dollar	Deposits	
Credit cards	Auto finance servicing	Short-term, small-dollar	Other consumer lending	Credit report furnishing	
Debt relief	Credit report furnishing	Other consumer lending	Credit repair	Student loans	

Figure 4 shows the top five enforcement action areas by number of cases under each director.[16] For all of the directors listed, "short-term, small-dollar" lending was a top focus. These typically involve payday lenders, pawn shop lenders, and similar short-term, small-dollar lending activities. The other most common cases involve debt collection and mortgages (both originating and servicing), both of which are in the top five for most of the directors.

The debt collection cases often involved allegations of Fair Debt Collection Practices Act (FDCPA) violations, Consumer Financial Protection Act (CFPA) violations, false or deceptive representations of outstanding debt, or misleading or excessive fees and interest rates. The mortgage cases involve issues such as allegations of redlining, pricing discrimination, Equal Credit Opportunity Act violations, deceptive advertising, and Truth in Lending Act violations.

Under Director Cordray, there was a relatively greater focus on mortgage loans and credit cards. Yet, the CFPB also had multiple actions involving payday loans under all the previous directors. Director Kraninger focused on actions involving small-dollar loans, debt collection, student loans, and deceptive practices. Under Director Chopra, the CFPB continued its focus on mortgages and small dollar loans, while also adding new focus areas relating to deposits, furnishing of consumer information to credit bureaus, and student loan lending.

Though Mulvaney and Uejio were acting directors, both saw enforcement actions continue during their tenures. The CFPB under Uejio focused on debt collection and relief and on small-dollar lending, while under Chopra, the agency focused on mortgage lending, deposits, credit reporting, and student loans, as well as continuing to take action on small dollar lending. Under acting Director Russell Vought, the CFPB undertook only one enforcement action which involved payment recordkeeping and consumer access to funds.

Figure 5: Top foci in enforcement actions under Deputy Director Johnson

Deputy Director Johnson *(34 Actions)*
Debt collection
Other consumer lending
Short-term, small-dollar
Credit cards
Debt relief

[16] We used focus as listed by the CFPB "Products" for each enforcement action.

During the months when Johnson was deputy director (or acting deputy director), the CFPB undertook 34 enforcement actions. These were mainly focused on debt collection, other consumer lending (primarily involving unlawful contracts or deceptive practices involving lending to veterans), and short-term, small-dollar lending. There were three actions involving credit cards, two of which were against banks, and three actions involving debt relief services.

Figure 6: Civil penalty funds collected by fiscal year[17]

Fiscal year	Civil penalty funds collected	# of parties paying penalties	Median civil penalty collected	Average civil penalty collected
2012	$32,000,000	2	$16,000,000	$16,000,000
2013	$49,520,001	11	$3,750,000	$4,501,818
2014	$77,502,001	22	$1,688,000	$3,522,818
2015	$183,120,079	37	$500,000	$4,949,191
2016	$182,138,760	31	$1,900,000	$5,875,444
2017	$42,488,801	38	$175,000	$1,118,126
2018	$522,761,388	14	$725,000	$37,340,099
2019	$131,171,664	24	$200,000	$5,465,486
2020	$34,189,709	34	$62,500	$1,005,580
2021	$61,411,211	32	$170,000	$1,919,100
2022	$172,520,004	25	$850,000	$6,900,800
2023	$1,918,920,125	23	$1,675,000	$83,431,310
2024	$169,954,725	26	$3,600,000	$6,536,720
2025	$175,731,046	12	$1,700,000	$12,303,746

Since its inception, the CFPB has collected an average of approximately $268 million in civil money penalties each fiscal year. The median value is $131 million per year, with about 20 to 30 parties paying civil penalties each fiscal year. The average amount is sensitive to outliers: some parties paid only a nominal $1 fee, while other parties paid substantial amounts.

The substantial civil money penalties collected in fiscal years 2018 and 2023 were largely attributable to penalties assessed against a large national bank: a $500 million penalty in April 2018 related to mortgage and auto lending activities, and a $1.7 billion penalty in December 2022 related to auto loan, mortgage, and deposit servicing activities.

Brian Johnson's tenure as deputy director overlapped with the 2019 fiscal year, during which the CFPB collected $131 million in civil penalties from 24 parties. He also served as deputy director during portions of fiscal years 2018 and the 2020, when the CFPB collected approximately $2.6 million in civil penalties in each year.

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[17] Source: CFPB's financial report for each fiscal year, available at **https://www.consumerfinance.gov/about-us/budget-strategy/financial-reports/**, last accessed on March 20, 2026.

Conclusion

The CFPB's level of consumer finance enforcement activity has fluctuated since the agency's creation. Although the agency appears less active than it was under the previous administration, history suggests that this will be a momentary pause and that enforcement activity will increase again, potentially with a greater focus on new priorities while maintaining focus on some existing areas of focus.

The CFPB may also look back at current lending practices when evaluating future enforcement actions. Accordingly, financial institutions should not become complacent in light of the reduced enforcement activity since 2025 and should continue to maintain robust compliance monitoring systems to help ensure compliance with consumer finance laws.

About the Financial Economics Practice at CRA

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