

## CFPB's Payday, Vehicle Title, and Certain High-Cost Installment Loans Rule

### Payday Lenders Are Reaping Rewards From Their Early Endorsement Of Kathy Kraninger And Financial Support Of Donald Trump

**Kathy Kraninger's CFPB Is Expected To Gut Its Payday Lending Rule By Weakening Ability-To-Repay Provisions.**

**Kathy Kraninger's CFPB Is Expected To Gut Its Payday Lending Rule By Revisiting Ability-To-Repay Provisions Requiring Payday Lenders To Verify Borrowers' Income And Ability To Repay Credit.**

**Kathy Kraninger's CFPB Is Expected To "Gut The Centerpiece" Of Its Payday Lending Rule, "The Ability-To-Repay Provisions In The 2017 Small-Dollar Lending Rule Issued Under Former Director Richard Cordray."** "The Consumer Financial Protection Bureau is expected to eliminate underwriting requirements in a highly anticipated revamp of its payday lending rule, according to sources familiar with the bureau's proposal. The CFPB in October signaled its interest in 'revisiting' the ability-to-repay provisions in the 2017 small-dollar lending rule issued under former Director Richard Cordray. But sources familiar with the agency's thinking say the CFPB — now led by Trump appointee Kathy Kraninger — has concluded the best approach is to remove those provisions altogether. Under the current rule, which has not yet gone fully into effect, lenders must verify a borrower's income as well as debts and other spending, to assess one's ability to repay credit while meeting living expenses. Such a course would gut the centerpiece of a rule that consumer advocates had hailed as a preventive measure against spiraling debt for consumers who rely on short-term credit." [Kate Berry, ["CFPB to scrap key underwriting portion of payday rule," American Banker, 01/14/19](#)]

**Community Financial Services Association Of America (CFSA), The Payday Industry's National Interest Group, Endorsed Kathy Kraninger Shortly After She Was Nominated.**

**The Community Financial Services Association of America (CFSA) Said It Looked Forward To Working With Kathy Kraninger Shortly After Her Nomination Was Announced.** On June 18, 2018, the Community Financial Services Association of America (CFSA) said in a press release, "CFSA congratulates Kathy Kraninger on her nomination to serve as CFPB Director. [...] Since its creation, the Bureau's agenda has been guided by partisan politics, which has led to harmful, biased rulemaking — notably its rulemaking that led to the Bureau's seriously flawed small-dollar lending rule. CFSA looks forward to working with Ms. Kraninger as the Bureau reconsiders — and hopefully repeals — this severely flawed rule." [Press Release, Community Financial Services Association of America, 06/18/18]

- **The Community Financial Services Association Of America (CFSA) Is A Payday Lending Interest Group.** "The Community Financial Services Association of America, an interest group that represents the payday loan industry, is hosting its four-day annual conference in April 2018 at Donald Trump's 90-hole golf resort 12 miles west of downtown Miami." [Alex Daugherty, ["Payday lenders, with major business before Trump, to hold conference at Trump Doral," Miami Herald, 11/08/17](#)]

- **The Office Of Management And Budget (OMB) Confirmed Kathy Kraninger's Nomination On June 18, 2018, The Same Day CFSA Announced Its Support.**  
"President Trump will nominate Office of Management and Budget (OMB) official Kathy Kraninger to be the next director of the Consumer Financial Protection Bureau (CFPB), the White House said [...] White House deputy press secretary Lindsay Walters

confirmed Trump's choice of Kraninger, an associate director at OMB," [Sylvan Lane, "[Trump to nominate budget official as next consumer bureau chief](#)," *The Hill*, 06/18/18]

## **Payday Lenders Held Their 2018 National Conference At Donald Trump's Resort In Miami, Florida.**

### **The Community Financial Services Association Of America (CFSA) Held Its 2018 Annual Conference At Trump National Doral In Miami, Florida.**

In April 2018, The Community Financial Services Association Of America, A Payday Lending Interest Group, Hosted Its Annual Conference At Trump National Doral In Miami, Florida. "The Community Financial Services Association of America, an interest group that represents the payday loan industry, is hosting its four-day annual conference in April 2018 at Donald Trump's 90-hole golf resort 12 miles west of downtown Miami." [Alex Daugherty, "[Payday lenders, with major business before Trump, to hold conference at Trump Doral](#)," *Miami Herald*, 11/08/17]

## **Payday Lenders Contributed Over \$2.2 Million To Donald Trump's Inauguration And Political Committees.**

### **Payday Industry Donors Contributed Over \$1.2 Million To Donald Trump's Inauguration**

Roderick Aycox Of Select Management Resources Contributed \$1 Million To Donald Trump's 2017 Inauguration. ["[Trump 2017 Inauguration Donors](#)," Center for Responsive Politics, accessed 12/03/17]

Advance America Cash Advance Centers Contributed \$250,000 To Donald Trump's 2017 Inauguration. ["[Trump 2017 Inauguration Donors](#)," Center for Responsive Politics, accessed 12/03/17]

Checks Into Cash, Inc. Contributed At Least \$25,000 To Donald Trump's 2017 Inauguration. ["[Trump 2017 Inauguration Donors](#)," Center for Responsive Politics, accessed 12/03/17]

### **Payday Industry Donors Contributed Over \$1 Million To Donald Trump's Political Committees**

**Michael Hodges, Chairman Of Harpeth Financial, Contributed At Least \$193,100 To Trump's Presidential Committees.**

- In 2017, Michael Hodges, chairman of Harpeth Financial, contributed at least \$35,000 to the Trump Victory committee, a joint fundraising committee. [FEC Search for [Trump Victory](#), 2017, accessed 11/13/17]
- In 2016, Michael Hodges, chairman of Harpeth Financial, contributed at least \$150,000 to the Trump Victory committee, a joint fundraising committee. [FEC Search for [Trump Victory](#), 2016, accessed 11/13/17]

# ACCOUNTABLE<sup>US</sup>

- In 2017, Michael Hodges, chairman of Harpeth Financial, contributed at least \$5,400 to Donald J. Trump for President committee. [FEC Search for [Donald J. Trump for President](#), 2017-2018, accessed 11/13/17]
- In 2016, Michael Hodges, chairman of Harpeth Financial, contributed at least \$2,700 to Donald J. Trump for President committee. [FEC Search for [Donald J. Trump for President](#), 2016, accessed 11/13/17]

## **Roderick Aycox, CEO Of Select Management Resources, And His Wife Contributed At Least \$702,000 To Trump's Presidential Committees.**

- In 2016, Roderick Aycox, CEO of Select Management Resources, contributed at least \$350,000 to Trump Victory Committee, a joint fundraising committee. [Search for [Trump Victory](#), 2016, Federal Election Commission, accessed 11/13/17]
- In 2016, Leslie Vail Aycox contributed at least \$350,000 to Trump Victory Committee, a joint fundraising committee. [[Trump Victory Schedule A](#), Federal Election Commission, 10/28/18]
- In 2016, Roderick Aycox, CEO of Select Management Resources, contributed at least \$2,700 to Donald J. Trump for President committee. [Search for [Donald J. Trump for President](#), 2016, Federal Election Commission, accessed 11/13/17]

## **Executives Of Jones Management Group Contributed At Least \$86,700 To Trump's Presidential Committees.**

- In 2016, Allan Jones, CEO of Jones Management Group, contributed at least \$5,400 to Donald J. Trump for President committee. [Search for [Donald J. Trump for President](#), 2016, Federal Election Commission, accessed 11/13/17]
- In 2016, Allan Jones, CEO of Jones Management Group, contributed at least \$80,400 to Trump victory committee, a joint fundraising committee. [Search for [Trump Victory](#), 2016, Federal Election Commission, accessed 11/13/17]
- In 2016, William Jones, VP of Jones Management Group, contributed at least \$400 to Donald J. Trump for President committee. [Search for [Donald J. Trump for President](#), 2016, Federal Election Commission, accessed 11/13/17]
- In 2016, William Jones, VP of Jones Management Group, contributed at least \$500 to Trump Make America Great Again Committee, a joint fundraising committee. [FSearch for [Trump Make America Great Again Committee](#), 2016, Federal Election Commission, accessed 11/13/17]

## **Ian Mackechnie, An Executive For Amscot Financial, Contributed At Least \$2,700 To Donald J. Trump For President Committee.** [FEC Search for [Donald J. Trump for President](#), 2016, Federal Election Commission, accessed 11/13/17]

## **Robert Zeitler, CEO Of PH Financial Services, Contributed At Least \$1,860 To Trump's Presidential Committees.**

- Robert Zeitler, CEO of PH Financial Services, contributed at least \$900 to Trump Make America Great Again Committee, a joint fundraising committee. [Search for [Trump Make America Great Again Committee](#), 2016, Federal Election Commission, accessed 11/13/17]
- Robert Zeitler, CEO of PH Financial Services, contributed at least \$960 to Donald J. Trump for President, Inc. [[Search for Donald J. Trump for President, Inc.](#), 2016, Federal Election Commission, accessed 10/29/18]

## **Eves Greyson, An Accountant For Community Choice Financial, Contributed At Least \$450 To Trump Presidential Committees.**

- Eves Greyson, an accountant for Community Choice Financial, contributed at least \$200 to Donald J. Trump for President committee. [Search for [Donald J. Trump for President](#), 2016, Federal Election Commission, accessed 10/29/18]
- Eves Greyson, an accountant for Community Choice Financial, contributed at least \$250 to Trump Make America Great Again Committee, a joint fundraising committee. [Search for [Trump Make America Great Again Committee](#), 2016, Federal Election Commission, accessed 10/29/18]

**NCP Finance Ohio Contributed At Least \$25,000 To Great America PAC, A Pro-Trump PAC.** [Search for [Great America PAC](#), 2016, Federal Election Commission, accessed 11/13/17]

## **The Payday Lending Industry Has Spent Nearly \$6.5 Million Lobbying The Federal Government Since Donald Trump Took Office**

**The Community Financial Services Association Of America Has Spent \$1,044,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, Community Financial Services Association Of America Spent \$460,000 Lobbying The Federal Government.**

In the first quarter of 2017, Community Financial Services Association of America spent \$120,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/18/17]

In the second quarter of 2017, Community Financial Services Association of America spent \$110,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/14/17]

In the third quarter of 2017, Community Financial Services Association of America spent \$110,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/12/17]

In the fourth quarter of 2017, Community Financial Services Association of America spent \$120,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/16/18]

### **In 2018, Community Financial Services Association Of America Spent \$494,000 Lobbying The Federal Government.**

In the first quarter of 2018, Community Financial Services Association of America spent \$110,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/16/18]

# ACCOUNTABLE<sup>US</sup>

In the second quarter of 2018, Community Financial Services Association of America spent \$114,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/16/18]

In the third quarter of 2018, Community Financial Services Association of America spent \$130,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/16/18]

In the fourth quarter of 2018, Community Financial Services Association of America spent \$140,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/17/19]

## **So Far In 2019, Community Financial Services Association Of America Spent \$90,000 Lobbying The Federal Government.**

In the first quarter of 2019, Community Financial Services Association of America spent \$90,000 in lobbying expenses. [[Community Financial Services Association of America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/22/19]

## **Financial Services Centers Of America Has Spent \$480,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, Financial Service Centers Of America Spent \$280,000 Lobbying The Federal Government.**

In the first quarter of 2017, Capitol Hill Consulting Group reported \$40,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Capitol Hill Consulting Group LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/20/17]

In the first quarter of 2017, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/18/17]

In the second quarter of 2017, Bradley Arant Boult Cummings LLP reported \$50,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Bradley Arant Boult Cummings LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/17]

In the second quarter of 2017, Capitol Hill Consulting Group reported \$40,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Capitol Hill Consulting Group LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/17]

In the second quarter of 2017, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/17/17]



# ACCOUNTABLE<sup>US</sup>

In the third quarter of 2017, Bradley Arant Boult Cummings LLP reported \$30,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Bradley Arant Boult Cummings LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/20/17]

In the third quarter of 2017, Capitol Hill Consulting Group reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Capitol Hill Consulting Group LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/17]

In the third quarter of 2017, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/17/17]

In the fourth quarter of 2017, Capitol Hill Consulting Group reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Capitol Hill Consulting Group LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/22/18]

In the fourth quarter of 2017, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/22/18]

## **In 2018, Financial Service Centers of America Spent \$140,000 Lobbying The Federal Government.**

In the first quarter of 2018, Capitol Hill Consulting Group reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Capitol Hill Consulting Group LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/18]

In the first quarter of 2018, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/18]

In the second quarter of 2018, Capitol Hill Consulting Group reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Capitol Hill Consulting Group LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/18]

In the second quarter of 2018, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/16/18]

In the third quarter of 2018, Capitol Hill Consulting Group reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Capitol Hill Consulting Group LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/11/18]

In the third quarter of 2018, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/18/18]

In the fourth quarter of 2018, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/22/19]

## **So Far In 2019, Financial Service Centers of America Spent \$60,000 Lobbying The Federal Government.**

In the first quarter of 2019, Crossroads Strategies, LLC reported \$40,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Crossroads Strategies, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/22/19]

In the first quarter of 2019, Hudson Cook, LLP reported \$20,000 in income for lobbying on behalf of the Financial Service Centers of America. [[Hudson Cook, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/11/19]

## **The American Financial Services Association Has Spent \$1,375,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, American Financial Services Association Spent \$525,000 Lobbying The Federal Government.**

In the first quarter of 2017, American Financial Services Association spent \$125,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/12/17]

In the second quarter of 2017, American Financial Services Association spent \$125,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/12/17]

In the third quarter of 2017, American Financial Services Association spent \$125,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/03/17]

In the fourth quarter of 2017, American Financial Services Association spent \$150,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/03/18]

### **In 2018, American Financial Services Association Spent \$600,000 Lobbying The Federal Government.**

In the first quarter of 2018, American Financial Services Association spent \$150,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/03/18]

In the second quarter of 2018, American Financial Services Association spent \$150,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/18]

In the third quarter of 2018, American Financial Services Association spent \$150,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/03/18]



# ACCOUNTABLE<sup>US</sup>

In the fourth quarter of 2018, American Financial Services Association spent \$150,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 12/20/18]

## **So Far In 2019, American Financial Services Association Has Spent \$250,000 Lobbying The Federal Government.**

In the first quarter of 2019, American Financial Services Association spent \$250,000 in lobbying expenses. [[American Financial Services Association LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/08/19]

## **Advance America Has Spent \$540,000 Lobbying The Federal Government Since Donald Trump Took Office.**

## **In 2017, Advance America Spent \$240,000 Lobbying The Federal Government.**

In the first quarter of 2017, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/17]

In the second quarter of 2017, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/17]

In the third quarter of 2017, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/20/17]

In the fourth quarter of 2017, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/19/18]

## **In 2018, Advance America Spent \$240,000 Lobbying The Federal Government.**

In the first quarter of 2018, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/18]

In the second quarter of 2018, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/18]

In the third quarter of 2018, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/16/18]

In the fourth quarter of 2018, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Advance America LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/18/19]

## **So Far In 2019, Advance America Has Spent \$60,000 Lobbying The Federal Government.**

In the first quarter of 2019, Cypress Advocacy, LLC reported \$60,000 in income for lobbying on behalf of Advance America. [[Cypress Advocacy, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/17/19]

## **Enova Online Services Has Spent \$360,000 Lobbying The Federal Government Since Donald Trump Took Office.**

## **In 2017, Enova Online Services Spent \$170,000 Lobbying The Federal Government.**

In the first quarter of 2017, Jackson Vaughn Public Strategies reported \$20,000 in income for lobbying on behalf of CNU Online Holdings, LLC. [[Jackson Vaughn Public Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/12/18]

In the second quarter of 2017, Jackson Vaughn Public Strategies reported \$50,000 in income for lobbying on behalf of CNU Online Holdings, LLC. [[Jackson Vaughn Public Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/12/17]

In the third quarter of 2017, Jackson Vaughn Public Strategies reported \$50,000 in income for lobbying on behalf of CNU Online Holdings, LLC. [[Jackson Vaughn Public Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/30/17]

In the fourth quarter of 2017, Jackson Vaughn Public Strategies reported \$50,000 in income for lobbying on behalf of CNU Online Holdings, LLC. [[Jackson Vaughn Public Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/08/18]

**CNU Online Holdings Is A Subsidiary Of Enova.** “The Enova Related Companies include, but are not limited to: CNU Online Holdings, LLC and all of its respective subsidiaries and affiliates.” [[Privacy Policy](#), Enova, accessed 05/08/19]

## **In 2018, Enova Online Services Spent \$160,000 Lobbying The Federal Government.**

In the first quarter of 2018, Jackson Vaughn Public Strategies reported \$50,000 in income for lobbying on behalf of CNU Online Holdings, LLC. [[Jackson Vaughn Public Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/10/18]

In the second quarter of 2018, Jackson Vaughn Public Strategies reported \$50,000 in income for lobbying on behalf of CNU Online Holdings, LLC. [[Jackson Vaughn Public Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/03/18]

In the third quarter of 2018, Lavender Consultants reported \$30,000 in income for lobbying on behalf of Jackson Vaughn Public Strategies on behalf of Enova Online Services, Inc. [[Lavender Consultants LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/15/18]

In the fourth quarter of 2018, Lavender Consultants reported \$30,000 in income for lobbying on behalf of Jackson Vaughn Public Strategies on behalf of Enova Online Services, Inc. [[Lavender Consultants LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/14/19]

**CNU Online Holdings Is A Subsidiary Of Enova.** “The Enova Related Companies include, but are not limited to: CNU Online Holdings, LLC and all of its respective subsidiaries and affiliates.” [[Privacy Policy](#),” Enova, accessed 05/08/19]

## **So Far In 2019, Enova Online Services Has Spent \$30,000 Lobbying The Federal Government.**

In the first quarter of 2019, Lavender Consultants reported \$30,000 in income for lobbying on behalf of Jackson Vaughn Public Strategies on behalf of Enova Online Services, Inc. [[Lavender Consultants LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/12/19]

## **ACE Cash Express Has Spent \$800,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, ACE Cash Express, Inc. Spent \$330,000 Lobbying The Federal Government.**

In the first quarter of 2017, ACE Cash Express, Inc. spent \$100,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/20/17]

In the second quarter of 2017, ACE Cash Express, Inc. spent \$120,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/17]

In the third quarter of 2017, ACE Cash Express, Inc. spent \$90,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/20/17]

In the fourth quarter of 2017, ACE Cash Express, Inc. spent \$20,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/22/18]

### **In 2018, ACE Cash Express, Inc. Spent \$390,000 Lobbying The Federal Government.**

In the first quarter of 2018, ACE Cash Express, Inc. spent \$60,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/20/18]

# ACCOUNTABLE<sup>US</sup>

In the second quarter of 2018, ACE Cash Express, Inc. spent \$190,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/18]

In the third quarter of 2018, ACE Cash Express, Inc. spent \$60,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/22/18]

In the fourth quarter of 2018, ACE Cash Express, Inc. spent \$80,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/22/19]

## **So Far In 2019, ACE Cash Express, Inc. Has Spent \$80,000 Lobbying The Federal Government.**

In the first quarter of 2019, ACE Cash Express, Inc. spent \$80,000 in lobbying expenses. [[ACE Cash Express, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/22/19]

## **Community Choice Financial Has Spent \$340,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, Community Choice Financial Inc. Spent \$280,000 Lobbying The Federal Government.**

In the first quarter of 2017, Avenue Strategies reported \$40,000 in income for lobbying on behalf of Community Choice Financial Inc. [[Avenue Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/17]

In the first quarter of 2017, Bradley Arant Boult Cummings LLP reported \$20,000 in income for lobbying on behalf of Community Choice Financial Inc. [[Bradley Arant Boult Cummings LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/20/17]

In the second quarter of 2017, Avenue Strategies reported \$120,000 in income for lobbying on behalf of Community Choice Financial Inc. [[Avenue Strategies LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/17]

In the third quarter of 2017, Turnberry Solutions, LLC reported \$40,000 in income for lobbying on behalf of Community Choice Financial Inc. [[Turnberry Solutions, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/20/17]

In the fourth quarter of 2017, Turnberry Solutions, LLC reported \$60,000 in income for lobbying on behalf of Community Choice Financial Inc. [[Turnberry Solutions, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/23/18]

### **In 2018, Community Choice Financial Inc. Spent \$60,000 Lobbying The Federal Government.**

In the first quarter of 2018, Turnberry Solutions, LLC reported \$60,000 in income for lobbying on behalf of Community Choice Financial Inc. [[Turnberry Solutions, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/20/18]

## **Harpeth Financial Services Has Spent \$520,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, Harpeth Financial Services Spent \$120,000 Lobbying The Federal Government.**

In the third quarter of 2017, The Smith-Free Group, LLC reported \$40,000 in income for lobbying on behalf of Harpeth Financial Services. [[The Smith-Free Group, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 11/22/17]

In the third quarter of 2017, Mercury Public Affairs, LLC reported \$10,000 in income for lobbying on behalf of Harpeth Financial Services. [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/13/17]

In the fourth quarter of 2017, The Smith-Free Group, LLC reported \$40,000 in income for lobbying on behalf of Harpeth Financial Services. [[The Smith-Free Group, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/17/18]

In the fourth quarter of 2017, Mercury Public Affairs, LLC reported \$30,000 in income for lobbying on behalf of Harpeth Financial Services. [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/19/18]

### **In 2018, Harpeth Financial Services Spent \$320,000 Lobbying The Federal Government.**

In the first quarter of 2018, The Smith-Free Group, LLC reported \$40,000 in income for lobbying on behalf of Harpeth Financial Services. [[The Smith-Free Group, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/18]

In the first quarter of 2018, Mercury Public Affairs, LLC reported \$30,000 in income for lobbying on behalf of Harpeth Financial Services. [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/18/18]

In the second quarter of 2018, The Smith-Free Group, LLC reported \$40,000 in income for lobbying on behalf of Harpeth Financial Services. [[The Smith-Free Group, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/18/18]

In the second quarter of 2018, Mercury Public Affairs, LLC reported \$30,000 in income for lobbying on behalf of Harpeth Financial Services. [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/18]

In the third quarter of 2018, The Smith-Free Group, LLC reported \$40,000 in income for lobbying on behalf of Harpeth Financial Services. [[The Smith-Free Group, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/15/18]

# ACCOUNTABLE<sup>US</sup>

In the third quarter of 2018, Mercury Public Affairs, LLC reported \$50,000 in income for lobbying on behalf of Harpeth Financial Services. [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/16/18]

In the fourth quarter of 2018, The Smith-Free Group, LLC reported \$40,000 in income for lobbying on behalf of Harpeth Financial Services. [[The Smith-Free Group, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/09/19]

In the fourth quarter of 2018, Mercury Public Affairs, LLC reported \$50,000 in income for lobbying on behalf of Harpeth Financial Services. [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/18/19]

## **So Far In 2019, Harpeth Financial Services Has Spent \$80,000 Lobbying The Federal Government.**

In the first quarter of 2019, The Smith-Free Group, LLC reported \$30,000 in income for lobbying on behalf of Harpeth Financial Services. [[The Smith-Free Group, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/18/19]

In the first quarter of 2019, Mercury Public Affairs, LLC reported \$50,000 in income for lobbying on behalf of Harpeth Financial Services. [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/11/19]

## **Select Management Resources Has Spent \$130,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, Select Management Resources Spent \$130,000 Lobbying The Federal Government.**

In the third quarter of 2017, Crossroads Strategies, LLC reported \$30,000 in income for lobbying on behalf of Select Management Resources, LLC. [[Crossroads Strategies, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/17]

In the fourth quarter of 2017, Crossroads Strategies, LLC reported \$100,000 in income for lobbying on behalf of Select Management Resources, LLC. [[Crossroads Strategies, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/21/18]

## **DMP Investments Has Spent \$160,000 Lobbying The Federal Government Since Donald Trump Took Office.**

### **In 2017, DMP Investments Spent \$80,000 Lobbying The Federal Government.**

In the first quarter of 2017, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/12/17]



# ACCOUNTABLE<sup>US</sup>

In the second quarter of 2017, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/17]

In the third quarter of 2017, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/11/17]

In the fourth quarter of 2017, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/19/18]

## **In 2018, DMP Investments Spent \$80,000 Lobbying The Federal Government.**

In the first quarter of 2018, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/17/18]

In the second quarter of 2018, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/18]

In the third quarter of 2018, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/18]

In the fourth quarter of 2018, ECA Strategies, Inc. reported \$20,000 in income for lobbying on behalf of DMP Investments. [[ECA Strategies, Inc. LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/21/19]

## **Amcscot Financial Has Spent \$720,000 Lobbying The Federal Government Since Donald Trump Took Office.**

## **In 2017, Amcscot Financial Corporation Spent \$320,000 Lobbying The Federal Government.**

In the first quarter of 2017, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amcscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/14/17]

In the second quarter of 2017, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amcscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/11/17]

In the third quarter of 2017, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amcscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/13/17]

In the fourth quarter of 2017, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/22/18]

## **In 2018, Amscot Financial Corporation Spent \$320.000 Lobbying The Federal Government.**

In the first quarter of 2018, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/13/18]

In the second quarter of 2018, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/06/18]

In the third quarter of 2018, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/18]

In the fourth quarter of 2018, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/15/19]

## **So Far In 2019, Amscot Financial Corporation Has Spent \$80.000 Lobbying The Federal Government.**

In the first quarter of 2019, Holland & Knight, LLP reported \$80,000 in income for lobbying on behalf of Amscot Financial Corporation. [[Holland & Knight, LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/10/19]

**Advance Financial Chairman Mike Hodges Has Paid Mick Mulvaney's Former Chief Of Staff \$350,000 To Allegedly \*NOT\* Lobby His Former Boss...**

**Mike Hodges, CEO Of Payday Lender Advance Financial, Has Admitted Publicly That He Helps Raise Money For The President So He Can Maintain Access To White House Officials.**

**Mike Hodges, CEO Of Payday Lender Advance America, Told His Fellow Payday Executives That Giving Money To President Trump's Campaign Would Enable Him To Maintain Access To White House Officials.**

**Michael Hodges Told Fellow Payday Lenders That “Industry Contributions To The President’s Reelection Campaign Could Be Leveraged To Gain Access To The Trump Administration.”** “Michael Hodges told fellow payday lenders recently that industry contributions to the president’s reelection campaign could be leveraged to gain access to the Trump administration. ‘Every dollar amount, no matter how small or large it is’ is important, Hodges, founder of Advance Financial, one of the country’s largest payday lenders, said during a 48-minute webcast, obtained by The Washington Post.” [Renae Merle, [“Payday lenders discussed raising money for Trump’s campaign to fend off regulation, audio reveals,”](#) *The Washington Post*, 10/29/19]

- **Hodges Claimed That Large Donations To The Republican National Committee Would Afford Him Meetings At The White House.** “For example, I’ve gone to Ronna McDaniel and said, ‘Ronna, I need help on something,’ Hodges said, referring to the chair of the Republican National Committee. ‘She’s been able to call over to the White House and say, ‘Hey, we have one of our large givers. They need an audience. ... They need to be heard and you need to listen to them.’ So that’s why it’s important.’” [Renae Merle, [“Payday lenders discussed raising money for Trump’s campaign to fend off regulation, audio reveals,”](#) *The Washington Post*, 10/29/19]

**Hodges Said That The More Money He Raises, The More “Clout” He Has To Speak To The Administration And Make Sure They Listen.** “During the webinar, Hodges explained why such fundraisers were important. When money comes in that way “that raises the clout of that fundraiser so that when you go and speak to the administration through the campaign, they will listen.” [Renae Merle, [“Payday lenders discussed raising money for Trump’s campaign to fend off regulation, audio reveals,”](#) *The Washington Post*, 10/29/19]

**Advance Financial Chairman Mike Hodges Told *The Washington Post* “I Haven’t Lobbied The Administration” —Yet His Company Has Paid \$350,000 To Hire Mick Mulvaney’s Former Chief Of Staff To Lobby The White House On The Payday Lending Rule And CFPB Issues.**

**Advance Financial Chairman Mike Hodges Claimed, “When I Am Talking About Access, I Am Not Talking About The Administration. I Haven’t Lobbied The Administration” As He Tried To Dismiss A Report That He Discussed Buying Access To Trump With Political Money.**

On October 29, 2019, *The Washington Post* Reported That Mike Hodges, Chairman Of Payday Lender Advance Financial, “Told Fellow Payday Lenders Recently That Industry Contributions To The President’s Reelection Campaign Could Be Leveraged To Gain Access To The Trump Administration.” On October 29, 2019, *The Washington Post* Reported “Billing himself as one of President Trump’s top fundraisers, Michael Hodges told fellow payday lenders recently that industry contributions to the president’s reelection campaign could be leveraged to gain access to the Trump administration. ‘Every dollar amount, no matter how small or large it is’ is important, Hodges, founder of Advance Financial, one of the country’s largest payday lenders, said during a 48-minute webcast, obtained by The Washington Post.”

[Renaë Merle, "[Payday lenders discussed raising money for Trump's campaign to fend off regulation, audio reveals](#)," *The Washington Post*, 10/29/19]

- **Mike Hodges Has Been Chairman Of The Board Of Advance Financial Since 1998.** [[LinkedIn Profile for Mike Hodges](#), accessed 10/25/19]

**Advance Financial Chairman Mike Hodges Told The Washington Post, "When I Am Talking About Access, I Am Not Talking About The Administration. I Haven't Lobbied The Administration," Claiming His Support For Trump "Is Not Connected To Pushing Any Specific Industry Agenda."** "When I am talking about access, I am not talking about the administration. I haven't lobbied the administration," he said in an interview. He said his support of the president is not connected to pushing any specific industry agenda." [Renaë Merle, "[Payday lenders discussed raising money for Trump's campaign to fend off regulation, audio reveals](#)," *The Washington Post*, 10/29/19]

**Advance Financial Has Hired Mick Mulvaney's Former Chief Of Staff To Lobby The White House's Office Of Administration On "The CFPB Small Dollar Rule"—That Office Is Currently Overseen By Mick Mulvaney.**

**In The Third Quarter Of 2019, Harpeth Financial Services Paid Mercury Public Affairs, LLC \$50,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 10/03/19]

- **Harpeth Financial Services Is "The Legal Name Of Advance Financial."** "Harpeth Financial Services, the legal name of Advance Financial, filed suit in the U.S. District Court [...]" [["Advance Financial sues Murfreesboro cash advance store over logo,"](#) Advance Financial, accessed 10/28/19]

**The Registered Lobbyist In This Disclosure Was Al Simpson, Mick Mulvaney's Chief Of Staff From 2011 To 2017.** The Lobbyist Was Al Simpson, Disclosed As "2011-2017 COS [Chief of Staff] REP Mick Mulvaney US Representative." [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 04/11/19]

**Al Simpson Became Mick Mulvaney's Chief Of Staff In January 2011 Before Becoming A Partner And Managing Director Of Mercury Public Affairs In February 2017.** [[LinkedIn Profile for Al Simpson](#), accessed 10/29/19]

**The Office Of Administration Is One Of The Offices "Overseen By The White House Chief Of Staff."** "Overseen by the White House Chief of Staff, the EOP has traditionally been home to many of the President's closest advisors." [["Executive Office of the President,"](#) The Obama White House Archive, accessed 10/29/19]

**The Office Of Administration Provides "Administrative Support And Business Services To All Components Within The Executive Office Of The President."** "The Office of Administration has seven offices that provide comprehensive administrative support and business services to all components within the Executive Office of the President." [["About the Office of Administration,"](#) The Obama White House Archive, accessed 10/29/19]

**Advance Financial Has Paid \$350,000 To Have Mick Mulvaney's Former Chief Of Staff Lobby On "The Small Dollar Rule" And CFPB Issues Through Nine Consecutive Quarters Since 2017.**

**In The Third Quarter Of 2019, Harpeth Financial Services Hired Al Simpson And Mercury Public Affairs, LLC For \$50,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 10/03/19]

**In The Second Quarter Of 2019, Harpeth Financial Services Hired Al Simpson Of Mercury Public Affairs, LLC For \$50,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 07/17/19]

**In The First Quarter Of 2019, Harpeth Financial Services Hired Al Simpson Of Mercury Public Affairs, LLC For \$50,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 04/11/19]

**In The Fourth Quarter Of 2018, Harpeth Financial Services Hired Al Simpson And Mercury Public Affairs, LLC For \$50,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 01/18/19]

**In The Third Quarter Of 2018, Harpeth Financial Services Hired Al Simpson And Mercury Public Affairs, LLC For \$50,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 10/16/18]

**In The Second Quarter Of 2018, Harpeth Financial Services Hired Al Simpson And Mercury Public Affairs, LLC For \$30,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 07/19/18]

**In The First Quarter Of 2018, Harpeth Financial Services Hired Al Simpson And Mercury Public Affairs, LLC For \$30,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 04/18/18]

**In The Fourth Quarter Of 2017, Harpeth Financial Services Hired Al Simpson And Mercury Public Affairs, LLC For \$30,000 To Lobby The "Office Of Administration" On The "CFPB Small Dollar Rule."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 01/19/18]

**In The Third Quarter Of 2017, Harpeth Financial Services Hired Al Simpson And Mercury Public Affairs, LLC For \$10,000 To Lobby The "Office Of Administration" On The "CFPB Reform."** [[Mercury Public Affairs, LLC LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Database, 07/23/18]

# ACCOUNTABLE<sup>US</sup>

**During His Time As A Lobbyist For Harpeth Financial, Al Simpson Has Had At Least Fourteen Meetings At The White House. Where His Former Boss and Once-Acting CFPB Director Mick Mulvaney Works.**

According to records released by the Office Of Management And Budget, Al Simpson attended meetings at the White House At Least Fourteen Times Between November 2017 – September 2019.

Dates Al Simpson Went To OMB
<a href="#">10/05/2017</a>
<a href="#">11/14/2017</a>
<a href="#">11/14/2017</a>
<a href="#">04/11/2018</a>
<a href="#">04/11/2018</a>
<a href="#">06/21/2019</a>
<a href="#">06/19/2018</a>
<a href="#">09/06/2018</a>
<a href="#">09/10/2018</a>
<a href="#">09/24/2018</a>
<a href="#">10/01/2018</a>
<a href="#">10/02/2018</a>
<a href="#">12/03/2018</a>
<a href="#">01/16/2019</a>
<a href="#">01/23/2019</a>

**Mick Mulvaney Has Had Several Meetings With Payday Lobbyist Al Simpson – But The Trump Administration Claims Mulvaney Was Never Lobbied During These Meetings, And That They Were “Solely For Social Purposes.”**

**Mick Mulvaney Has Had Numerous Meetings With Al Simpson, A Payday Lending Lobbyist Who Also Served As Mulvaney’s Chief Of Staff In Congress.**

On November 20, 2019, The *Washington Post* Reported That Since Joining The Trump Administration, Mick Mulvaney Has Had Numerous Meetings With Al Simpson, His Former Chief Of Staff Who Now Serves As A “Key Lobbyist For One Of The Country’s Largest Payday Lenders.” “Over the past 2½ years, Mick Mulvaney’s former chief of staff has been a key lobbyist for one of the country’s largest payday lenders, giving the industry access to the White House at a time it is fighting to roll back industry regulations. During that time, Al Simpson has met repeatedly with Mulvaney, whom he worked for on Capitol Hill until 2017. They have had dinner several times, and Simpson has been a frequent visitor to the Office of Management and Budget, according to public records.” [Renae Merle, “[Once Mulvaney’s chief of staff, payday lobbyist enjoys frequent access to his old boss,](#)” *The Washington Post*, 11/20/19]



**Al Simpson Has Lobbied On Behalf Of Advance Financial, A Payday Lender Founded By Mike Hodges, “A Major Fundraiser And Contributor To President Trump’s Campaign” Who Has “Voiced The Importance Of Having Close Ties To The Trump Administration” In An Industry Webinar.** “Meanwhile, Simpson has been lobbying Congress and the Office of Administration on behalf of Tennessee-based Advance Financial, which was founded by Mike Hodges, a major fundraiser and contributor to President Trump’s campaign. Hodges recently told industry colleagues in a webinar first obtained by The Washington Post of the importance of having close ties to the Trump administration.” [Renaë Merle, “[Once Mulvaney’s chief of staff, payday lobbyist enjoys frequent access to his old boss](#),” *The Washington Post*, 11/20/19]

**The Trump Administration Claims Al Simpson Never Lobbied Mick Mulvaney Despite Visiting The Office Of Management And Budget (OMB) At Least 11 Times And Appearing On Mulvaney’s Calendars “More Frequently Than Anyone Who Is Not A Current Government Official Over A Seven-Month Period In 2017” – The Administration Alleges These Meetings Were “Solely For Social Purposes.”**

**The Trump Administration Claims That Al Simpson Never Lobbied Mick Mulvaney And That All Meetings Were “Solely For Social Purposes.”** “According to a White House official, Simpson has never lobbied his former boss. ‘Al Simpson is one of Mick Mulvaney’s oldest and closest friends. When Simpson has visited Mick at the White House it has been solely for social purposes. Not once has Simpson lobbied Mick in any of his official roles, whether at OMB, CFPB, or as White House chief of staff,’ the official said.” [Renaë Merle, “[Once Mulvaney’s chief of staff, payday lobbyist enjoys frequent access to his old boss](#),” *The Washington Post*, 11/20/19]

**This Is Despite Al Simpson Having At Least 11 Meetings At OMB And Appearing On Mulvaney’s Calendars “More Frequently Than Anyone Who Is Not A Current Government Official Over A Seven-Month Period In 2017.”** “Since Simpson became a lobbyist for Mercury Public Affairs, he has had dinner with Mulvaney at least three times, including dining at a seafood restaurant in the Navy Yard and at Trattoria Alberto of Capitol Hill, according to Mulvaney’s public calendar. He has also visited the Office of Management and Budget 11 times. Simpson appeared on Mulvaney’s calendars more frequently than anyone who is not a current government official over a seven-month period in 2017, according to ProPublica. He sometimes brought clients, including representatives for BlueCross BlueShield of South Carolina, to those meetings.” [Renaë Merle, “[Once Mulvaney’s chief of staff, payday lobbyist enjoys frequent access to his old boss](#),” *The Washington Post*, 11/20/19]

- **Mick Mulvaney Has Served As Director Of The Office Of Management And Budget “Since The Beginning” Of The Trump Administration.** “President Trump on Friday abruptly named Mick Mulvaney, currently the director of the Office of Management and Budget, as acting White House chief of staff, elevating a conservative ideologue with congressional experience to steer the administration through a treacherous phase. [...] He has served as budget director since the beginning, but he also held the role of acting director of the Consumer Financial Protection Bureau for the past year until his permanent successor, Kathleen Kraninger, was sworn in this week.” [Phillip Rucker, Josh Dawsey, and Damian Paletta, “[Trump names budget director Mick Mulvaney as acting White House chief of staff](#),” *The Washington Post*, 12/14/18]

## **Thousands Of Public Comments Submitted In Support Of The Proposed Payday Lending Rule Use Specific, Duplicative Language To Describe Why The Commenter Supports Payday Lending.**

**At Least 7,128 Comments Submitted In Support Of The CFPB's Proposed Payday Rule Contain Specific Duplicative Language—  
Over 27% Of Total Comments.**

### **As Of May 13, 2019, 25,983 Comments Have Been Submitted On The CFPB's Proposed Rule On Payday, Vehicle Title, and Certain High-Cost Installment Loans.**

As Of May 13, 2019, 25,983 Public Comments Have Been Submitted On The CFPB's Proposed Rule On Payday, Vehicle Title, and Certain High-Cost Installment Loans.  
[[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

### **At Least 5,301 Comments State, Verbatim, "Please Don't Make It More Difficult For Me To Get These Loans. [...] Millions Of Americans Like Me Rely On Payday Loans, And The Government Shouldn't Take Away Our Access To Credit."**

At Least 5,301 Submitted Comments On The CFPB's Proposed Payday Rule State, Verbatim, "As You Take A Second Look At The Payday Loan Rule, Please Don't Make It More Difficult For Me To Get These Loans. [...] Without Them, I May Not Be Able To Meet My Financial Obligations. Millions Of Americans Like Me Rely On Payday Loans, And The Government Shouldn't Take Away Our Access To Credit." At least 5,301 comments submitted on the CFPB's proposed rule on Payday, Vehicle Title, and Certain High-Cost Installment Loans contain the exact phrase: "Without them, I may not be able to meet my financial obligations. Millions of Americans like me rely on payday loans, and the government shouldn't take away our access to credit." [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- The full comment reads: "Dear Consumer Financial Protection Bureau, As you take a second look at the payday loan rule, please don't make it more difficult for me to get these loans. Payday loans have helped me manage my finances and are very important to me. Without them, I may not be able to meet my financial obligations. Millions of Americans like me rely on payday loans, and the government shouldn't take away our access to credit." [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

### **At Least 852 Comments State, Verbatim, That The Borrower Supports The "Proposal To Rescind And Delay Portions Of The 2017" Rule**

## **Because “Mandatory Underwriting Would Be Too Costly And Time-Consuming.”**

**At Least 852 Submitted Comments On The CFPB’s Proposed Payday Rule State, “I Support Your Proposal To Rescind And Delay Portions Of The 2017 Payday, Vehicle Title, And High-Cost Installment Loans Rule. Mandatory Underwriting Would Be Too Costly And Time Consuming.”** At least 852 comments submitted on the CFPB’s proposed rule on Payday, Vehicle Title, and Certain High-Cost Installment Loans contain the exact phrase: “I support your proposal to rescind and delay portions of the 2017 Payday, Vehicle Title, and High-Cost Installment Loans Rule. Mandatory underwriting would be too costly and time-consuming.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- The full comment reads: “I support your proposal to rescind and delay portions of the 2017 Payday, Vehicle Title, and High-Cost Installment Loans Rule. Mandatory underwriting would be too costly and time-consuming for small dollar loans to remain viable, which means \$20 billion in credit for consumers in dire straits would be eliminated from the economy. These are customers that banks do not cater to, and they therefore would find themselves without any access to credit. In emergencies, these consumers could be forced to turn to criminal syndicates, write bad checks, or let critical bills go unpaid. The CFPB should be focused on expanding consumer access to credit, not eliminating it. The Cordray rule violated free market principles and I applaud you for reconsidering it. This proposed rulemaking is a critical step toward moving CFPB away from liberal activism and toward its mission of protecting consumers, and I would strongly support any and all additional efforts to revisit Obama/Cordray regulations to ensure consumers are not harmed by losing access to products due to excessive regulation.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

## **At Least 214 Comments Claim, Verbatim, That The Borrower Took Out Payday Loans Because They “Needed To Replace [Their] Hot Water Tank” And Their “Appliances Needed To Be Repaired And Eventually Replaced.” Citing Cash Connection As Their Lender Of Choice.**

**At Least 214 Submitted Comments On The CFPB’s Proposed Payday Rule Claim The Borrower Takes Out Payday Loans Because They “Needed To Replace [Their] Hot Water Tank” And Their “Appliances Needed To Be Repaired And Eventually Replaced.”** At least 214 comments submitted on the CFPB’s proposed rule on Payday, Vehicle Title, and Certain High-Cost Installment Loans contain the exact phrase: “I borrow from Cash Connection to help maintain my home. I needed to replace my hot water tank. Then my appliances needed to be repaired and eventually replaced.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- The full comment reads: “I borrow from Cash Connection to help maintain my home. I needed to replace my hot water tank. Then my appliances needed to be repaired and eventually replaced. Borrowing a small loan allows me to leave my other money alone so that I can still pay my regular bills.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

**At Least 434 Public Comments On The Proposed Payday Rule Mention Cash Connection, A Payday Lender.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

**At Least 221 Comments Claim, Verbatim, “I Have A Long Commute To Work And Its Better For Me Financially To Borrow From Cash Connection So That I Can Still Make It To Work Than To Not Take Care Of My Car And Lose My Job Because Of Absences.”**

**At Least 221 Submitted Comments On The CFPB’s Proposed Payday Rule Claim The Borrower Takes Out Payday Loans Because Of Car Issues And “Its Better For Me Financially To Borrow From Cash Connection So That I Can Still Make It To Work.”** At least 221 comments submitted on the CFPB’s proposed rule on Payday, Vehicle Title, and Certain High-Cost Installment Loans contain the exact phrase: “I have a long commute to work and its better for me financially to borrow from Cash Connection so that I can still make it to work than to not take care of my car and lose my job because of absences.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- The full comment reads: “I borrow because my car expenses insurance, repairs, gas never seem to go away. I have a long commute to work and its better for me financially to borrow from Cash Connection so that I can still make it to work than to not take care of my car and lose my job because of absences.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

**At Least 434 Public Comments On The Proposed Payday Rule Mention Cash Connection, A Payday Lender.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

**At Least 141 Comments Claim, Verbatim, That Payday Loans Allow The Borrower To Help Pay For Their Daughter’s College So She Won’t “Grow Her Student Loan Debt To An Amount She Will Never Be Able To Pay Off.” Noting, “Shes A Good Student And Has A Job But She Still Needs Some Help.”**

**At Least 141 Submitted Comments On The CFPB’s Proposed Payday Rule State, Verbatim, “I Borrow To Help My Child Pay For College. Shes A Good Student And Has A Job But She Still Needs Some Help. [...] I Can Borrow A Small Loan Rather Than Have Her Grow Her Student Loan Debt To An Amount She Will Never Be Able To Pay Off.”** At least 141 comments submitted on the CFPB’s proposed rule on Payday, Vehicle Title, and Certain High-Cost Installment Loans contain the exact phrase: “help my child pay for college. Shes a good student and has a job but she still needs some help. I figure its what a parent does. I can borrow a small loan rather than have her grow her student loan.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- The full comment reads: “I borrow to help my child pay for college. Shes a good student and has a job but she still needs some help. I figure its what a parent does. I can borrow a small loan rather than have her grow her student loan debt to an amount she will never be able to pay off.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

## **At Least 201 Comments Claim, Verbatim, “I Now Take Care Of My Parents And My Children” And “Want To Be Able To Enjoy Life And Not Feel Burdened By The Additional Expenses That Are Piling Up.”**

At Least 201 Submitted Comments On The CFPB’s Proposed Payday Rule Claim, “I Now Take Care Of My Parents And My Children” And “Want To Be Able To Enjoy Life And Not Feel Burdened By The Additional Expenses That Are Piling Up.” At least 201 comments submitted on the CFPB’s proposed rule on Payday, Vehicle Title, and Certain High-Cost Installment Loans contain the exact phrase: “I borrow because I now take care of my parents and my children. I still want to be able to enjoy life and not feel burdened by the additional expenses that are piling up.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

## **At Least 198 Comments Claim, Verbatim, “My Medical Expenses Are Too High For Me To Pay Without Borrowing. I Need My Medications. My Insurance Doesnt Cover Most Of My Expenses.”**

At Least 198 Submitted Comments On The CFPB’s Proposed Payday Rule Claim, “My Medical Expenses Are Too High For Me To Pay Without Borrowing. I Need My Medications. My Insurance Doesnt Cover Most Of My Expenses.” At least 198 comments submitted on the CFPB’s proposed rule on Payday, Vehicle Title, and Certain High-Cost Installment Loans contain the exact phrase: “I borrow because my medical expenses are too high for me to pay without borrowing. I need my medications. My insurance doesnt cover most of my expenses.” [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

## **At Least 991 Comments On The CFPB’s Proposed Payday Rule Mention A Specific Payday Lending Company.**

### **Advance America Is Mentioned In At Least 204 Comments On The CFPB’s Proposed Payday Rule.**

At Least 204 Comments On The Proposed Payday Rule Mention Advance America, A Payday Lender. [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

### **Community Choice Financial And Its Subsidiaries Are Mentioned In At Least 160 Comments On The CFPB’s Proposed Payday Rule.**

At Least 12 Comments On The Proposed Payday Rule Mention Community Choice Financial, A Payday Lending Company. [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

At Least 76 Comments On The Proposed Payday Rule Mention Easy Money, A Subsidiary Of Community Choice Financial. [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]



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- Easy Money Cash Centers is a subsidiary of Community Choice Financial. [[Easy Money Cash Centers](#), Community Choice Financial, accessed 05/11/19]

**At Least 27 Comments On The Proposed Payday Rule Mention CheckSmart, A Subsidiary Of Community Choice Financial.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- CheckSmart is a subsidiary of Community Choice Financial. [[CheckSmart](#), Community Choice Financial, accessed 05/11/19]

**At Least 18 Comments On The Proposed Payday Rule Mention California Check Cashing, A Subsidiary Of Community Choice Financial.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- California Check Cashing Stores is a subsidiary of Community Choice Financial. [[California Check Cashing Stores](#), Community Choice Financial, accessed 05/11/19]

**At Least 27 Comments On The Proposed Payday Rule Mention First Virginia, A Subsidiary Of Community Choice Financial.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

- First Virginia Loans is a subsidiary of Community Choice Financial. [[First Virginia Loans](#), Community Choice Financial, accessed 05/11/19]

## **Cash Central Is Mentioned In At Least 31 Comments On The CFPB's Proposed Payday Rule.**

**At Least 31 Comments On The Proposed Payday Rule Mention Cash Central, A Payday Lender.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

## **Title Cash Is Mentioned In At Least 32 Comments On The CFPB's Proposed Payday Rule.**

**At Least 32 Comments On The Proposed Payday Rule Mention Title Cash, A Payday Lender.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

## **Money Matters Is Mentioned In At Least 130 Comments On The CFPB's Proposed Payday Rule.**

**At Least 130 Public Comments On The Proposed Payday Rule Mention Money Matters, A Payday Lender.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]

## **Cash Connection Is Mentioned In At Least 434 Comments On The CFPB's Proposed Payday Rule.**

**At Least 434 Public Comments On The Proposed Payday Rule Mention Cash Connection, A Payday Lender.** [[Docket Browser Search for CFPB-2019-0006](#), Regulations.gov, accessed 05/13/19]



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