

#### UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Office of the Secretary

February 19, 2021

The Honorable Dave Uejio Acting Director Consumer Financial Protection Bureau 1700 G Street, NW Washington, DC 20552

Dear Acting Director Uejio:

We received a letter from Director Kathleen Kraninger on January 5, 2021 requesting an update regarding the FTC's activities covering the debt collection market during 2020. As the letter mentions, the Consumer Financial Protection Bureau (CFPB) is responsible for providing annual reports to Congress concerning the federal government's efforts to implement the Fair Debt Collection Practices Act (FDCPA).<sup>1</sup> This letter and its appendix describe the efforts the Federal Trade Commission (Commission or FTC) has taken during the past year in the debt collection arena. In the FTC's debt collection work, the CFPB has been a valuable partner. We hope that the information in this letter will assist the CFPB in preparing this year's report.

In 2020, the Commission continued to combat unfair, deceptive, and otherwise unlawful debt collection practices with its law enforcement activities. Among other things, the FTC:

- led Operation Corrupt Collector, a nationwide federal-state law enforcement sweep and outreach initiative targeting phantom debt collection and abusive and threatening debt collection practices;
- filed or resolved 7 cases against 39 defendants, and obtained \$26 million in judgments;<sup>2</sup>
- brought the first federal action combatting unlawful "debt parking"; and
- banned the operator of a debt collection scheme who engaged in serious and repeated violations of law from ever working in debt collection again.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> The Dodd-Frank Act directed the CFPB to report to Congress on the federal government's implementation and administration of the FDCPA. Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), Pub. L. 11-203, § 1089, 124 Stat. 1376, 2092-93 (2010) (amending the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692-1692p). Before the enactment of the Dodd-Frank Act, Section 815(a) of the FDCPA, 15 U.S.C. § 1692m, required the FTC to report directly to Congress on these topics. The Commission submitted such annual reports from 1977 to 2011.

<sup>&</sup>lt;sup>2</sup> These figures include cases filed in 2020, as well as cases filed in previous years but resolved in 2020.

<sup>&</sup>lt;sup>3</sup> In 2015, the FTC began publishing a list of every individual and company that the agency has sued that has been banned from the debt collection industry. This list, located at <u>https://www.ftc.gov/enforcement/cases-</u>

The FTC's debt collection program focuses primarily on law enforcement.<sup>4</sup> In addition, the FTC engages in public outreach and cross-agency coordination.

### I. <u>LAW ENFORCEMENT ACTIVITIES</u>

The Commission is primarily a law enforcement agency, and law enforcement investigations and litigation are at the heart of the FTC's recent debt collection work. Both the FDCPA and the FTC Act<sup>5</sup> authorize the Commission to investigate and take law enforcement action against debt collectors that violate those statutes.<sup>6</sup> The Commission may file a federal court action seeking injunctive and equitable monetary relief under Sections 13(b) and 19 of the FTC Act, 15 U.S.C. § 53(b) and 57b, or refer the matter to the Department of Justice for civil penalties and injunctive relief under Section 5(m) of the FTC Act, 15 U.S.C. § 45(m).

From January 1 through December 31, 2020, the FTC brought or resolved seven debt collection cases. In the FTC's three new actions under Operation Corrupt Collector, the FTC obtained preliminary relief, including temporary restraining orders that froze the defendants' assets and appointed receivers to take over the debt collection businesses. The Commission also brought the first federal action against unlawful "debt parking," filed suit to combat the unlawful and unfair use of confessions of judgment, and took action against a telemarketing scheme that threatened organizations for failing to pay for unordered merchandise. Finally, the FTC resolved an action against a debt collection scheme involving "overbiffing."

## A. Operation Corrupt Collector

In September 2020, the Commission announced Operation Corrupt Collector, a coast-tocoast law enforcement crackdown on "phantom debt collection"—the practice of coercing consumers to pay debts that either do not exist or that they do not owe—and other egregious debt collection practices. The FTC led the initiative, coordinating with three other federal agencies and partners from 16 states to bring more than 50 actions nationwide.<sup>7</sup> As part of Operation Corrupt Collector, the Commission initiated three law enforcement actions: (1) *National Landmark Logistics* (2) *Absolute Financial Services*, and (3) *Critical Resolution Mediation*. Litigation continues in all three of these matters. It is particularly important for the FTC, the

<sup>&</sup>lt;u>proceedings/banned-debt-collectors</u>, is a valuable resource to help law-abiding collection industry professionals avoid doing business with these defendants, as well as to help state debt collection licensing officials and law enforcers better protect consumers. Currently, the list includes 208 banned individuals and companies.

<sup>&</sup>lt;sup>4</sup> This past year's work built upon and expanded the FTC's ongoing crackdown on unlawful debt collection practices. Since January 1, 2010, the FTC has sued more than 349 companies and individuals who engaged in unlawful collection practices, banning 201 from the industry, and securing more than \$589.6 million in judgments. <sup>5</sup> FDCPA, 15 U.S.C. § 1692-1692p; FTC Act, 15 U.S.C. §§ 41-58.

<sup>&</sup>lt;sup>6</sup> The FDCPA authorizes the Commission to investigate and take law enforcement action against debt collectors that engage in unfair, deceptive, abusive, or other practices that violate the statute. FDCPA § 814, 15 U.S.C. § 1692*l*. Under the FTC Act, the FTC may investigate and take law enforcement action against entities that, in connection with collecting on debts, engage in unfair or deceptive acts and practices. FTC Act § 5, 15 U.S.C. § 45.

<sup>&</sup>lt;sup>7</sup> Press Release, Operation Corrupt Collector cracks down on illegal debt collection tactics (Sept. 29, 2020), *available at* <u>https://www.ftc.gov/news-events/press-releases/2020/09/ftc-state-federal-law-enforcement-partners-announce-nationwide</u>.

chief federal agency on privacy and data security, to bring phantom debt cases, which illustrate the financial harm that occurs when bad actors mishandle consumers' personal information.<sup>8</sup>

In National Landmark Logistics, the FTC filed a complaint and secured a temporary restraining order in July 2020 to immediately halt defendants' illegal practices.<sup>9</sup> The FTC alleges that National Landmark Logistics, four related companies, and three individuals took in revenue of at least \$13.7 million through an illegal debt collection scheme, which included pressuring consumers to pay debts they did not actually owe or that the defendants had no right to collect.<sup>10</sup> The defendants typically used robocalls to leave deceptive messages that people were subject to an audit or proceeding or would be served with papers at home or at work. When consumers returned the call to find out more, the defendants falsely claimed to be from a mediation or law firm, and that the consumer was delinquent on a debt. In many instances, collectors threatened consumers with legal action unless they made an immediate credit or debit card payment. To make the pitch seem more believable, collectors often had (or claimed to have) personal information about the supposed debtor, such as their Social Security number, credit card or bank account numbers, or family members' contact information. At the FTC's request, the court granted a temporary restraining order that provided for the freezing of defendants' assets, the appointment of a temporary receiver, and immediate access to business premises and records.

The FTC simultaneously filed a companion action, *Absolute Financial Services, LLC*, and obtained a temporary restraining order in that action.<sup>11</sup> The complaint charges that Absolute Financial Services, two related companies, and two individuals collected more than \$6.9 million from consumers, using National Landmark Logistics to place deceptive robocalls on their behalf.<sup>12</sup> The prerecorded messages claimed that people would be served with important papers or faced legal action or audits if they did not respond. The FTC alleges that once people called back, the defendants' collectors falsely claimed to be representatives of law firms or mediation companies. According to the complaint, the collectors told consumers that they owed a credit card or other debt and often threatened them with arrest if they did not immediately pay the debt. Using data from National Landmark Logistics, the Absolute Financial Services collectors used consumers' personal information in an attempt to add an aura of truth to the false statements they made about purported debts. As with *National Landmark Services*, the court granted the FTC's motion for a temporary restraining order that froze the defendants' assets, appointed a receiver, and allowed for immediate access to business premises and records.

In *Critical Resolution Mediation*, the FTC obtained a federal court order to shut down an Atlanta-based debt collection operation. The FTC's complaint alleged that defendants' agents

<sup>&</sup>lt;sup>8</sup> The FTC's other work to protect consumers' personal information can be found in the annual Privacy and Data Security Update. *See, e.g.*, Reports, *Privacy & Data Security Update: 2019* (Feb. 2019), *available at* <u>https://www.ftc.gov/system/files/documents/reports/privacy-data-security-update-2019/2019-privacy-data-security-report-508.pdf</u>.

<sup>&</sup>lt;sup>9</sup> *FTC v. National Landmark Logistics LLC et al.*, 0:20-cv-02592-JMC (D.S.C. July 17, 2020) (Order).

<sup>&</sup>lt;sup>10</sup> *FTC v. National Landmark Logistics LLC et al.*, 0:20-cv-02592-JMC (D.S.C. July 13, 2020) (Complaint); *FTC v. National Landmark Logistics LLC et al.*, 0:20-cv-02592-JMC (D.S.C. July 13, 2020) (Memo ISO Motion for TRO). <sup>11</sup> *FTC v. Absolute Financial Services, LLC et al.*, 0:20-cv-02596-JMC (D.S.C. July 17, 2020) (Order).

<sup>&</sup>lt;sup>12</sup> FTC v. Absolute Financial Services, LLC et al., 0:20-cv-02596-JMC (D.S.C. July 13, 2020) (Complaint); FTC v. Absolute Financial Services, LLC et al., 0:20-cv-02596-JMC (D.S.C. July 13, 2020) (Memo ISO Motion for TRO).

threatened consumers with arrest and imprisonment and tried to collect debts that consumers did not actually owe.<sup>13</sup> According to the FTC, the collectors regularly posed as law enforcement officers, attorneys, mediators, or process servers when calling consumers, lending credence to their threats about supposed unpaid debts. In many cases, the defendants attempted to collect phantom debts.<sup>14</sup> According to the complaint, the company's collectors threatened not only to arrest and jail consumers who refused to pay immediately, but also to garnish consumers' wages, revoke their drivers' licenses, or lower their credit scores. In addition, the collectors allegedly contacted consumers at their workplaces or notified their families about the supposed debt, shared consumers' personal information, and threatened serious legal consequences. The collectors allegedly used profane language with consumers who refused to pay or asserted their right to review information about the purported debts. The defendants also refused to provide information about the alleged debts as required under the FDCPA. In November 2020, the court entered a stipulated preliminary injunction against all defendants, which maintained the relief secured by the September temporary restraining order, including the freezing of defendants' assets and appointment of a temporary receiver.

### **B.** Debt Parking and Other Actions

Debt Parking. In Midwest Recovery Systems, the first federal action combatting unlawful "debt parking," the Commission took action against a debt collection company and its owners that allegedly reported purported debts to credit reporting agencies without first communicating with the consumer about the debt. The FTC's complaint alleges that Midwest Recovery Systems received thousands of complaints each month about the purported debts from consumers, with the company itself finding that between 80 and 97 percent of the debts it investigated were inaccurate or not valid.<sup>15</sup> In addition to phantom payday lending debts, the complaint notes that the company parked significant quantities of purported medical debt, which is often a source of confusion and uncertainty for consumers because of the complex, opaque system of insurance coverage and cost sharing. The FTC's complaint alleges violations of the FDCPA (including the first federal law enforcement count addressing debt parking), the Fair Credit Reporting Act (FCRA), and the FCRA's Furnisher Rule. Under a November 2020 settlement, Midwest Recovery Systems is prohibited from debt parking and required to delete the debts it previously reported to credit reporting agencies. The settlement includes a monetary judgment of \$24.3 million, which is partially suspended based on an inability to pay. Brandon Tumber, one of the individual defendants and a co-owner of the company, also will be required to sell his stake in another debt collection company and provide the proceeds from that sale to the FTC. In addition, the company will be required to surrender all of its remaining assets.

*Confessions of Judgment.* In *RCG Advances*, the FTC sued two New York-based companies engaged in small business financing, along with several of their owners and officers. The June 2020 complaint alleged that the defendants deceived small businesses and other

<sup>&</sup>lt;sup>13</sup> Press Release, FTC Acts to Shut Down Unlawful Debt Collection Operation (Oct. 15, 2020), *available at* <u>https://www.ftc.gov/news-events/press-releases/2020/10/ftc-acts-shut-down-unlawful-debt-collection-operation;</u> *FTC v. Critical Resolution Mediation LLC et al.*, 1:20-cv-3932-JPB (N.D. Ga. Sept. 30, 2020) (Order).

FIC v. Critical Resolution Mediation LLC et al., 1:20-cv-3932-JPB (N.D. Ga. Sept. 30, 2020) (Order).

<sup>&</sup>lt;sup>14</sup> FTC v. Critical Resolution Mediation LLC et al., 1:20-cv-3932-JPB (N.D. Ga. Sept. 22, 2020) (Complaint).

<sup>&</sup>lt;sup>15</sup> Press Release, FTC Stops Debt Collector's Alleged "Debt Parking" Scheme, Requires it to Delete Debts it Placed on Consumers' Credit Reports (Nov. 30, 2020), *available at* <u>https://www.ftc.gov/news-events/press-</u> releases/2020/11/ftc-stops-debt-collectors-alleged-debt-parking-scheme-requires-it.

organizations by misrepresenting the terms of merchant cash advances they provided, and then used unfair collection practices, including sometimes threatening physical violence, to compel consumers to pay.<sup>16</sup> The FTC also alleged that defendants required businesses and their owners to sign confessions of judgment as part of their contracts, which allowed the defendants to go immediately to court and obtain an uncontested judgment in case of an alleged default. Defendants unlawfully and unfairly used these confessions of judgment to seize consumer personal and business assets, in circumstances not expected by consumers and not permitted by the defendants' financing contracts. Furthermore, the complaint alleges that the defendants made threatening calls to consumers, including telling one consumer that they would "break his jaw" if he did not make his payments and, in another case, threatening to ruin a consumer's reputation by falsely accusing him of being a child molester, if he did not pay. Litigation continues in this matter.

*Other Actions.* In *American Future Systems* (AFS), the FTC sued the operators of a Pennsylvania-based telemarketing scheme and a New York-based debt collection operation.<sup>17</sup> The May 2020 complaint alleges that the AFS telemarketers billed organizations such as businesses, schools, fire and police departments, and non-profits for books and newsletter subscriptions they never ordered. The telemarketers typically claimed that they would send two issues of a newsletter at "no risk," while enrolling the organization in a negative option program without their consent, under which they are automatically invoiced for annual subscriptions to the newsletters. After six months, AFS forwarded unpaid bills for unwanted and unordered subscriptions to a debt collection firm, International Credit Recovery, Inc. (ICR). According to the complaint, ICR illegally threatened those organizations if they failed to pay for the unordered merchandise. ICR made representations during the collection process that failure to pay the debt would impact their credit rating or would result in legal action or referral to collections. In addition to AFS and ICR, the FTC's complaint names the sole owner of AFS, as well as ICR's two principals. Litigation is ongoing in this matter.

In February 2020, the Commission and the New York Attorney General settled claims against Robert Heidenreich, the operator of a debt collection scheme in *Campbell Capital*.<sup>18</sup> According to the October 2018 complaint, he and the companies he controlled lied to consumers about how much debt they owed and used illegal scare tactics to collect it. Defendants' employees often completed forms that showed they demanded more money than consumers allegedly owed, also known as "overbiffing." Some of defendants' collectors pretended to work for law enforcement agencies and threatened consumers with arrest. Other collectors falsely claimed to work on behalf of attorneys and falsely told consumers they would face lawsuits if

worked; FTC v. American Future Systems, Inc. et al., 2:20-cv-02266 (E.D. Pa. May. 13, 2020) (Complaint).

<sup>&</sup>lt;sup>16</sup> Press Release, New York-Based Finance Companies Deceived Small Businesses, Non-Profits and Seized Their Personal and Business Assets, FTC Alleges (June 10, 2020), *available at* <u>https://www.ftc.gov/news-events/press-releases/2020/06/new-york-based-finance-companies-deceived-small-businesses</u>.

<sup>&</sup>lt;sup>17</sup> Press Release, FTC Files Complaint Alleging Telemarketers and Debt Collectors Worked Together To Bilk Organizations for Subscriptions and Books They Never Ordered (May 13, 2020), *available at* https://www.ftc.gov/news-events/press-releases/2020/05/ftc-files-complaint-alleging-telemarketers-debt-collectors-

<sup>&</sup>lt;sup>18</sup> Press Release, Operator of Fraudulent Debt Collection Scheme Settles With FTC, New York (Feb. 25, 2020), *available at* <u>https://www.ftc.gov/news-events/press-releases/2020/02/operator-fraudulent-debt-collection-scheme-settles-ftc-new-york</u>.

they did not make a payment on an alleged debt.<sup>19</sup> The settlement permanently bans Heidenreich from working in the debt collection business, prohibits him from misleading consumers about any financial products, and includes a monetary judgment of \$1.7 million, which is partially suspended due to inability to pay.<sup>20</sup> The FTC and New York Attorney General filed a motion for a default judgment with the court against the case's remaining defendants, which the court also entered in February 2020.

## II. <u>Public Outreach and Cross-Agency Coordination</u>

*Public Outreach.* Consumer and business education and public outreach are also important parts of the Commission's debt collection program. The FTC uses multiple formats and channels to educate consumers about their rights under the FDCPA, as well as what the statute requires of debt collectors, and to inform debt collectors about what they must do to comply with the law. The FTC also engages in education and public outreach to enhance legal services providers' understanding of debt collection issues.

The Commission reaches tens of millions of consumers through English and Spanish print and online materials, blog posts, speeches, and presentations. To maximize its outreach efforts, FTC staff works with an informal network of about 9,000 community-based organizations and national groups that order and distribute FTC information to their members, clients, and constituents. In 2020, the FTC distributed 6.5 million print publications to libraries, police departments, schools, non-profit organizations, banks, credit unions, other businesses, and government agencies. The FTC also logged more than 75.6 million views of its business and consumer education website pages in 2020. The FTC's channel at YouTube.com/FTCvideos houses 383 business and consumer videos in English and Spanish, which were viewed more than 1.1 million times in 2020. The three videos that address debt collection<sup>21</sup> were watched a combined 23,400 times in 2020. Additionally, the consumer blogs in English<sup>22</sup> and Spanish<sup>23</sup> reached 284,323 and 55,163 email subscribers, respectively, and regularly serve as source material for local and national news stories.

As part of its work to raise awareness about scams targeting the Latino community, the FTC has a series of fotonovelas (graphic novels) in Spanish. These graphic novels tell stories based on complaints Spanish speakers make to the FTC and offer practical tips to help detect and stop common scams. The FTC distributed 15,755 copies of the *Cobradores De Deuda* (Debt Collectors) fotonovela in 2020. The FTC also uses infographics to attract readers' attention and

<sup>&</sup>lt;sup>19</sup> *FTC v. Campbell Capital LLC et al.*, 1:18-cv-01163 (W.D.N.Y. Oct. 23, 2018) (Complaint); *see also* Press Release, FTC and New York Attorney General Sue Operators of Debt Collection Scheme (Nov. 1, 2018), *available at* <u>https://www.ftc.gov/news-events/press-releases/2018/11/ftc-new-york-attorney-general-sue-operators-debt-collection</u>.

<sup>&</sup>lt;sup>20</sup> *FTC v. Campbell Capital LLC et al.*, 1:18-cv-01163 (W.D.N.Y. Feb. 7, 2020) (Orders).

<sup>&</sup>lt;sup>21</sup> <u>Debt Collection: Know Your Rights</u> summarizes consumer rights and encourages viewers to report problem calls to the FTC; <u>Fraud Affects Every Community: Debt Collection</u> tells a veteran's experience with abusive debt collection and the legal assistance that helped him get the case dismissed; and <u>Dealing with Debt Collectors</u> summarizes what debt collectors may and may not do, and how viewers can exercise their rights and report violations to the FTC.

<sup>&</sup>lt;sup>22</sup> <u>http://www.consumer.ftc.gov/blog.</u>

<sup>&</sup>lt;sup>23</sup> <u>http://www.consumidor.ftc.gov/blog</u>.

convey educational messages with simple text and appealing graphics. In 2020, the FTC created the *Don't Recognize that Debt*? infographic<sup>24</sup> as part of the Operation Corrupt Collector<sup>25</sup> law enforcement sweep. State and local consumer protection agencies across the country have joined the FTC in introducing this new infographic to help consumers know their rights when contacted by debt collectors and to take protective steps if they are pressured to pay a debt they do not recognize. The colorful, easy-to-read infographic explains how to respond to a debt collection call, where to learn more, and how to report to the FTC. The infographic was added to the FTC's revised article on Fake and Abusive Debt Collectors<sup>26</sup> and was downloaded 800 times in three months. Also as part of Operation Corrupt Collector, the FTC released a new online dashboard<sup>27</sup> that provides a state-by-state breakdown of consumer debt collection complaints received through the FTC's Consumer Sentinel Network.

The Commission also educates industry members by developing and distributing business education materials, delivering speeches, blogging, participating in panel discussions at industry conferences, and providing interviews to general media and trade publications. The FTC's business education resources can be found in its online Business Center. The Business Center logged more than 10.4 million page views in 2020, and there are more than 101,786 email subscribers to the Business Blog. A complete list of the FTC's consumer and business education materials relating to debt collection, and information on the extent of their distribution, is set forth in Appendix A to this letter.

FTC staff also regularly meets with legal service providers, consumer advocates, and people who work in immigrant, Native American, Latino, Asian, and African American communities to discuss consumer protection issues, including the FTC's work in the debt collection arena. For example, the FTC hosted three virtual Ethnic Media Roundtables in 2020, bringing together law enforcement, community organizations, consumer advocates and members of the ethnic media to discuss how consumer protection issues—including debt collection—affect their communities. FTC staff also convened ten listening sessions with legal service providers, consumer advocates and local, state, and federal law enforcement personnel to learn about debt collection and other issues affecting people because of COVID-19.

*Cross Agency Coordination.* The FTC continues to work closely with the CFPB to coordinate efforts to protect consumers from unfair, deceptive, and abusive debt collection practices.<sup>28</sup> As part of this coordination, FTC and CFPB staff regularly meet to discuss ongoing

<sup>&</sup>lt;sup>24</sup> <u>https://www.consumer.ftc.gov/sites/www.consumer.ftc.gov/files/corrupt\_collector\_infographic\_508\_v2.pdf.</u>

<sup>&</sup>lt;sup>25</sup> Press Release, Operation Corrupt Collector cracks down on illegal debt collection tactics (Sept. 29, 2020), *available at* <u>https://www.ftc.gov/news-events/press-releases/2020/09/ftc-state-federal-law-enforcement-partners-</u> announce-nationwide.

<sup>&</sup>lt;sup>26</sup> https://www.consumer.ftc.gov/articles/0258-fake-and-abusive-debt-collectors.

<sup>&</sup>lt;sup>27</sup> https://public.tableau.com/profile/federal.trade.commission#!/vizhome/DebtCollection/Infographic.

<sup>&</sup>lt;sup>28</sup> The Dodd-Frank Act directs the FTC and the CFPB to coordinate their law enforcement activities and promote consistent regulatory treatment of consumer financial products and services, including debt collection. *See* Dodd-Frank Act, Pub. L. 111-203, 124 Stat. 1376 § 1024(c)(3) (July 21, 2010). In January 2012, the FTC and CFPB entered into a memorandum of understanding (MOU) that supplements the requirements of the Dodd-Frank Act and creates a strong and comprehensive framework for coordination and cooperation. Memorandum of Understanding Between the Consumer Financial Protection Bureau and the Federal Trade Commission (Jan. 2012), *available at* http://www.ftc.gov/sites/default/files/attachments/press-releases/federal-trade-commission-consumer-financial-protection-bureau-pledge-work-together-protect-consumers/120123ftc-cfpb-mou.pdf. The agencies reauthorized the

and upcoming law enforcement, rulemaking, and other activities; share debt collection complaints; cooperate on consumer education efforts in the debt collection arena; and consult on debt collection rulemaking and guidance initiatives. The FTC also engages in regular coordination activities with other law enforcement partners at the federal, state, and local levels, and routinely provides technical assistance on draft legislation pertaining to debt collection.

# III. <u>CONCLUSION</u>

The Commission hopes that the information contained in this letter will assist the CFPB in preparing its annual report to Congress about its administration of the FDCPA. The FTC looks forward to continuing to cooperate and coordinate with the CFPB on consumer protection issues relating to debt collection. If any other information would be useful or if you wish to request additional assistance, please contact Malini Mithal, Associate Director, Division of Financial Practices, at (202) 326-2972.

By direction of the Commission.

April J. Tabor Secretary

MOU in February 2019. *See* Press Release, FTC and CFPB Reauthorize Memorandum of Understanding (Feb. 26, 2019), *available at* <u>https://www.ftc.gov/news-events/press-releases/2019/02/ftc-cfpb-reauthorize-memorandum-understanding</u>; Memorandum of Understanding between the FTC and the CFPB (Feb. 25, 2019), *available at* <u>https://www.ftc.gov/system/files/documents/cooperation\_agreements/ftc-cfpb\_mou\_225\_0.pdf</u>.

# Appendix A

### **2020 Debt Collection Information**

Consumer Information	Views		Print Orders	
Article	English	Spanish	English	Spanish
Debt Collection FAQ	206,179	1,037	68,350	8,975
Debt Collectors (Fotonovela)				15,755
Debts and Deceased Relatives	49,834	111,967		
Fake Debt Collectors	62,160	68,312		
Fake and Abusive Debt Collectors	12,043	457		
Garnishing Federal Benefits	40,191	2,426		
Identity Theft Letter to a Debt Collector	6,006	207		
Managing Debt: What to Do	4,152	12,563	36,000	6,500
Settling Credit Card Debt	121,204	45,184		
Time-Barred Debts	64,751	90,187		
Video				
Fraud Affects Every Community: Debt	346			
Collection				
Debt Collection: Know Your Rights	3,860	2,590		

<b>Business Information</b>	Views	
Article	English	Spanish
The Fair Debt Collection Practices Act	7,915	
Video		
Debt Collection	2806	177

## **2020 Consumer Blog Posts**

Debt collectors: Mind the "No Parking" signs on credit reports Have you gotten a collection call about a debt you don't recognize? Dealing with debt collectors during the pandemic

### **2020 Business Blog Posts**

Setting the debt parking brake Operation Corrupt Collector cracks down on illegal debt collection tactics

\* "Views" is the number of times a page was viewed on an FTC website. A person who views a page may also download, re-post, or copy and share content from an FTC page, which increases the total number of people who see the article.