

# Rent-a-Bank Loans

## Predatory Rent-a-Bank Loan Watch List by State

### Reports & Issue Briefs

- Report: Predatory Lenders TAB Bank and EasyPay Finance Harm Veterans and Military Servicemembers with Loans up to 189%, May 25, 2022
- Report: Predatory Auto Repair Loans By TAB Bank and EasyPay Finance, May, 11 2022
- Consumer Alert: Deceptive Auto Repair Financing Practices, May 2022
- Report: Predatory Puppy Loans by TAB Bank and EasyPay Finance, February 2022
- Brief: Why Cap Interest Rates at 36%?, August 2021
- Brief: Predatory Rent-a-Bank Schemes Are Evading State Law Across the Country; Congress Must Repeal the OCC's Fake Lender Rule, May 2021
- Brief: Who Supports Overturning the OCC's "Fake Lender" Rule?, May 2021
- Fact Sheet: Correcting the Record: The OCC's "Fake Lender" Rule Expands Harmful, Predatory Lending, April 2021
- Brief: Repeal the OCC's Fake Lender Predatory Lending Rule to Protect Small Businesses, April 2021
- Brief: Overturn the OCC's "Fake Lender" Predatory Lending Rule, March 2021
- Brief: 2021 Banking Agency Predatory Lending and Safe Banking Priorities, December 2020
- Brief: Payday Lenders Plan to Evade California's New Interest Rate Cap Law through Rent-A-Bank Partnership, October 2019

More policy briefs & fact sheets

### Op-eds & Media Hits

- Op-ed: The Rule Allowing Predatory Loans from Fake Lenders Must Go Now by Lauren Saunders, June 10, 2021
- Op-ed: Congress Must Overturn OCC's 'Fake Lender' Rule: Payday Lenders Benefit, Consumers Lose by Lauren Saunders and Lisa Stiffler, April 22, 2021
- Op-Ed: Rent-a-bank schemes trample voters' and states' rights by Lauren Saunders, Feb. 8, 2018

### Comments & Testimony

- Joint Comments to the FDIC re: Community Reinvestment Act Examination of Transportation Alliance Bank, Jun. 30, 2022
- Group comments to bank regulators on Third-Party Risk Management Guidance urging end to rent-a-bank schemes, Oct. 18, 2021
- Group long comments to the Office of the Comptroller of the Currency opposing predatory rent-a-bank proposal regarding the true lender: national banks and federal savings associations as lenders; short comments by 101 community, consumer and civil rights groups; press release, Sept. 3, 2020.
- Testimony of Lauren Saunders before the U.S. House Financial Services Committee on Rent-a-Bank Schemes and New Debt Traps, Feb. 5, 2020

More comments & testimony

## Letters

- Coalition letter to FDIC Board of Directors re: FDIC-supervised banks helping predatory lenders make loans up to 225% APR that are illegal in almost every state, Feb. 2, 2022
- Bipartisan Group of 25 State Attorneys Generals Letter Urges Congress to Rescind OCC “True Lender” Rule, April 21, 2021
- 138 Academics Letter Supporting S.J. Res. 15/ H.J. Res 35 Disapproving OCC’s Rule on National Banks and Federal Savings Associations as Lenders (True Lender rule) and press release, April 20, 2021
- Coalition Letter re: Support CRA Challenge to OCC “Fake Lender” Predatory Lending Rule, April 20, 2021

More letters

## Litigation

- Amicus Brief of Center for Responsible Lending et al in opposition to Demurrer in Opportunity Financial v. CA Dept. of Financial Protection and Innovation, Jul. 8, 2022
- Amicus brief (N.D. Cal) of NCLC et al in People of the State of Calif. v. FDIC on the validity of the FDIC’s “Madden-fix” rule, Apr. 29, 2021
- Amicus brief (U.S. District Court for Northern CA) of Center for National Consumer Law Center, Center for Responsible Lending, East Bay Community Law Center, National Association for Community Asset Builders, and the National Coalition for Asian Pacific American Community Development in support of the plaintiffs in People of the State of California et al v The Office of the Comptroller of the Currency and Brian P. Brooks, Dec. 17, 2020
- Amicus brief (Second District Court of Appeals) of the National Consumer Law Center, Center for Responsible Lending, and the National Community Reinvestment Corporation in Lacewell v the Office of the Comptroller of the Currency supporting the plaintiff New York State Department of Financial Services, July 30, 2020
- Amicus Brief of National Consumer Law Center and the Center for Responsible Lending supporting neither party in David Petersen, et al v. Chase Card Funding, LLC, Chase Issuance Trust, and Wilmington Trust Company, as Trustee of Chase Issuance Trust filed with the U.S. Western District Court of New York, Feb. 7, 2020
- Amicus Brief of National Consumer Law Center, Center for Responsible Lending and Colorado Public Interest Research in support of plaintiff in Martha Fulford v Avant of Colorado LLC et al and Web Bank, January 14, 2020
- Amicus Brief of National Consumer Law Center, Center for Responsible Lending and Colorado Public Interest Research in support of plaintiff in Martha Fulford v Marlette Funding, January 14, 2019

## Press Releases

- In Evaluating TAB Bank, FDIC Should Consider Consumer Harm, Possible Legal Violations, from Predatory Lending, Jun. 30, 2022
- National Auto Repair Chains Must Stop Offering Predatory Loans Through EasyPay Finance and TAB Bank, May 18, 2022
- New Report and Consumer Alert Flag Deceptive Auto Repair Financing Practices, May 11, 2022
- Predatory Loans for Puppies Must be Stopped, Say Consumer and Animal Welfare Advocates, Feb. 14, 2022
- Advocates Applaud \$4 million DC Settlement with Predatory Rent-a-Bank Lender Elevate, Feb.

8, 2022

- Advocates Call for FDIC, under New Leadership, to Stop Banks from Fronting for Predatory Lenders, Feb. 2, 2022
- Advocates Applaud DC Predatory Rent-a-Bank Lending Settlement, November 30, 2021
- National Consumer Law Center Advocates Praise U.S. House Vote to Repeal National Banking Regulator's Predatory Lending Rule, June 25, 2021
- Advocates Applaud Senate Repeal of National Banking Regulator's Predatory Lending Rule; Urge the House to Act Soon, May 11, 2021
- New Bank Regulator Leadership Welcome; Congress Still Must Roll Back Rule Promoting Predatory Lending, May 5, 2021
- Bipartisan Group of 25 State Attorneys General Urge Congress to Repeal OCC "True Lender" Rule, April 21, 2021
- Nearly 140 Scholars Call for Congressional Repeal of "True Lender" Rule, April 20, 2021
- Congress Introduces Resolution to Rescind OCC's "Fake Lender" Rule, Which Protects Predatory Lenders' Evasions of State Interest Rate Limits, March 25, 2021
- Days Before Crucial Deadline, the National Consumer Law Center Joins Over 325 Groups Calling for Congress to Rescind "Fake Lender" Rule that Facilitates Predatory Loan Schemes, March 22, 2021

More press releases