



Predatory Rent-a-Bank Lending in Colorado

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Colorado law limits interest rates to protect its residents from predatory lending. Under Colorado law a two-year \$2,000 loan is limited to **31% APR**.

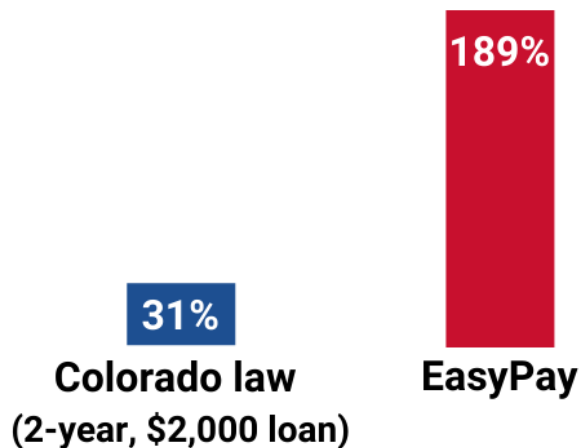
But FDIC-supervised banks are fronting for high-cost lenders to help them evade Colorado law and make loans over 100% that are illegal in Colorado. Banks are exempt from state rate caps, and a few rogue banks are helping predatory lenders disguise their loans as bank loans so they can charge triple-digit interest rates. Predatory rent-a-bank lending hurts consumers and **disabled veterans**.

EasyPay Finance uses Utah-based **TAB Bank** to evade the law of Colorado and other states so it can make loans at **130% to 189%** through **pet stores**, auto mechanics and furniture stores. Hundreds of consumers across the country have complained about EasyPay loans, including complaints about **predatory puppy loans**.

In 2021, Congress, on a **bipartisan basis**, passed a resolution to override a regulation, the **“fake lender” rule**, that would have protected predatory rent-a-bank schemes. **President Biden**, when signing the resolution, said: “rent-a-bank schemes ... allow lenders to prey on veterans, seniors, and other unsuspecting borrowers tapping in the – trapping them into a cycle of debt.” Rent-a-bank schemes are of questionable legality and have been **challenged** in court.

But a few, rogue FDIC-supervised banks are still helping predatory lenders evade state laws.

Colorado Maximum APR & EasyPay/TAB Rent-a-Bank Rate



To preserve Colorado’s authority to stop predatory lending, we must:

- Tell the **FDIC** to stop its banks from fronting for predatory lenders evading state law.
- Pass the **Veterans and Consumers Fair Credit Act**, S. 2508/H.R. 5974, to enact a **national 36% interest rate cap** covering all lenders, including banks, and allow states to set lower limits.