

80 Community, Civil Rights, Consumer, Civic and Other Organizations

The Honorable French Hill
Chairman
House Committee on Financial Services
2129 Rayburn House Office Building
Washington DC, 20515

The Honorable Maxine Waters
Ranking Member
House Committee on Financial Services
2129 Rayburn House Office Building
Washington DC, 20515

June 25, 2025

Re: Oppose H.R. 1653, the Civil Investigative Demand Reform Act of 2025

Dear Chairman Hill and Ranking Member Waters:

The 80 undersigned community, civil rights, consumer, civic and other organizations urge you to oppose H.R. 1653, the Civil Investigative Demand Reform Act of 2025.¹ This harmful legislation would give lawbreakers tools to delay enforcement when they violate the law and make it harder for the Consumer Financial Protection Bureau (CFPB) to investigate and bring enforcement actions returning money to consumers when large banks, Big Tech companies, credit bureaus, debt collectors, predatory lenders and others engage in misconduct and hurt people. Enforcement is an important tool used by the CFPB to keep people safe from financial fraud and harm, and civil investigative demands (CIDs) are the first step in that enforcement process. Through a combination of supervision and enforcement, including 39 public enforcement actions involving servicemembers and veterans, the CFPB has helped obtain over \$21 billion in relief to everyday people.² Creating new bureaucratic hurdles and unnecessarily heightening CID requirements will greatly undermine the CFPB's ability to impactfully and effectively enforce the institutions when they break the law.

The Consumer Financial Protection Act (CFPA) provides the CFPB with broad authority to issue civil investigative demands (CIDs). CIDs are investigational subpoenas that help the Bureau thoroughly and carefully investigate potential violations of the law. CIDs allow the Bureau to ask for documents, emails, reports, answers to written questions, and oral testimony. To make sure CIDs are fair, they are also required to notify institutions what conduct is being investigated, and which laws apply to that alleged violation.³ CIDs are the critical first step in the lifecycle of an enforcement action, allowing the Bureau to gather facts and identify violations prior to deciding whether or not to proceed with a public enforcement action.

The CFPB's CID procedures are similar to those of other civil law enforcement agencies. Even without the proposed legislation, companies are able to delay and try to avoid investigative requests years at a time. For example, Block was able to delay for over two years responding to a CID from the CFPB investigating problems with the Cash App.⁴ That delay postponed the CFPB's ability to

¹ [Civil Investigative Demand Reform Act of 2025](#). H.R. 1653. 119th Congress. (2025).

² Consumer Financial Protection Bureau (CFPB). [About the Bureau](#). Accessed April 9, 2025.

³ Consumer Financial Protection Bureau (CFPB). [Investigatory Authority](#). Accessed April 9, 2025.

⁴ See [Order](#) granting petition to enforce civil investigation demands, *Consumer Financial Protection Bureau v. Block Inc.*, Case No. 22-mc-80214-SK (N.D. Cal. Nov. 13 2022) (Block, which owns Cash App, successfully delayed complying with the CFPB's requested CID from the CFPB's requested date of August 2022 all the way until the federal court ordered compliance by January 2023).

obtain an order requiring Block to pay \$175 million, fix failures that allowed fraud to proliferate, and comply with legal duties to investigate consumer disputes about unauthorized transactions.⁵

H.R. 1653, the Civil Investigative Demand Reform Act of 2025, unnecessarily hamstrings the CID process even further. The bill's burdensome requirements would allow institutions being investigated to further delay complaints and avoid accountability.

- The bill's requirement⁶ to add "specific reference to particular facts" would force the Bureau to add an additional pre-investigation step into the enforcement process while also tipping off a wrongdoer to key facts before an investigation begins, which undermines the very purpose of the investigation.
- The bill's six-year time limit on issuing a CID⁷ would impose a backdoor six-year statute of limitations for Bureau claims, even though many of the enforced statutes already have discovery deadlines. This additional limitation imposed on the Bureau could curtail efforts to help people hurt by schemes that have lasted longer than six years. It would also cobble Bureau efforts to gather evidence more than six years old to show the complete picture of misconduct.
- The bill's requirement to allow investigated entities to submit additional questions that require a response within 20 days is unnecessary.⁸ This type of information is already provided under the current CID process as attorneys representing institutions can already request additional information through the meet and confer process.

For these reasons, the undersigned organizations strongly oppose this unnecessary legislation and urge members of this committee to oppose H.R. 1653 as well. At a time when the Trump administration, along with Elon Musk and DOGE, are actively stopping the CFPB's work entirely, Congress should be focusing its energy on how to protect the Bureau and enforce the law, rather than how to further undermine the Bureau's enforcement efforts. Instead of siding with billionaires, Wall Street banks, Big Tech companies, and predatory lenders, Congress must side with everyday people and vote against any legislation that would further weaken the CFPB, undermine its authority, and change its funding structure.

Thank you for your consideration,

20/20 Vision
Accountable.US/Accountable.NOW
Action Center on Race and the Economy
Alliance for Justice
American Association of People with Disabilities
American Economic Liberties Project
American Friends Service Committee
Americans for Financial Reform
Appleseed Foundation

Autistic People of Color Fund
Brooklyn Cooperative Federal Credit Union (NY)
CAMBA Legal Services, Inc. (NY)
CASA of Oregon (OR)
CCPAA (California Consumer Protection Attorneys Association) (CA)
Center for Digital Democracy
Center for Economic Integrity (AZ)
Center for Fair Housing (AL)

⁵ CFPB, Press Release, [CFPB Orders Operator of Cash App to Pay \\$175 Million and Fix Its Failures on Fraud](#) (Jan. 16, 2025).

⁶ [Civil Investigative Demand Reform Act of 2025](#). H.R. 1653. 119th Cong. §2(b). (2025).

⁷ [Civil Investigative Demand Reform Act of 2025](#). H.R. 1653. 119th Cong. §2(a). (2025).

⁸ [Civil Investigative Demand Reform Act of 2025](#). H.R. 1653. 119th Cong. §2(c). (2025).

Center for LGBTQ Economic Advancement & Research (CLEAR)
 Church Women United in New York State (NY)
 Colorado Consumer Health Initiative (CO)
 Colorado Latino Leadership, Advocacy & Research Organization (CLLARO) (CO)
 Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
 Consumer Action
 Consumer Federation of America
 Consumer Reports
 Consumers Council of Missouri (MO)
 Consumers for Auto Reliability and Safety
 Credit Builders Alliance
 DC Consumer Rights Coalition (DC)
 Delaware Community Reinvestment Action Council, Inc. (DE)
 Economic Action Maryland Fund (MD)
 Economic Empowerment Center DBA Lending Link (NE)
 Electronic Privacy Information Center (EPIC)
 Epiphany United Church of Christ, St. Louis, MO (MO)
 Equal Rights Advocates
 Faith in New Jersey (NJ)
 Faith in New York (NY)
 Faith Voices of Southwest Missouri (MO)
 Fresh Start (SC)
 H.O.M.E DuPage, Inc (IL)
 Health Law Advocates (MA)
 Housing Action Illinois (IL)
 Housing and Community Development Network of New Jersey (NJ)
 Housing and Economic Rights Advocates (CA)
 ISAIAH (MN)
 Japanese American Citizens League
 Kentucky Equal Justice Center (KY)
 Lawrence CommunityWorks (MA)
 League of United Latin American Citizens (LULAC)
 Lois Healy (FL)
 Minority Veterans of America
 Missouri Faith Voices (MO)
 National Advocacy Center of the Sisters of the Good Shepherd
 National Consumer Law Center (on behalf of its low-income clients)
 National Consumers League
 National Employment Law Project
 National Housing Law Project
 Nebraska Appleseed (NE)

New Jersey Appleseed Public Interest Law Center (NJ)
 New Mexico Fair Lending Coalition (NM)
 New Yorkers for Responsible Lending (NY)
 Oregon Consumer Justice (OR)
 People Power United
 PRG, Inc (MN)
 Public Good Law Center
 Public Justice
 Public Justice Center (MD)
 Quaker Action Mid Atlantic Region (PA)
 Service Employees International Union
 South Carolina Appleseed Legal Justice Center (SC)
 TakeRoot Justice (NY)
 The Academy of Financial Education (CA)
 Tina Rosales-Torres (CA)
 TURN-The Utility Reform Network (CA)
 Tzedek DC (DC)
 University of Minnesota Law School (MN)
 Valley interfaith (TX)
 Virginia Organizing (VA)
 WESPAC Foundation, Inc. (NY)
 William E. Morris Institute for Justice (AZ)