



441 G St. N.W.
Washington, DC 20548

January 27, 2026

Congressional Requesters

Consumer Financial Protection Bureau: Status of Reorganization Efforts

The Dodd-Frank Wall Street Reform and Consumer Protection Act created the Consumer Financial Protection Bureau (CFPB) to regulate the offering and provision of financial products or services under federal consumer financial laws.¹ The act assigned CFPB many of the consumer financial protection authorities previously shared by seven federal agencies. It also provided CFPB additional authorities related to enforcing compliance with federal consumer financial laws, handling consumer complaints, promoting financial education, and monitoring financial markets to identify risks to consumers.

According to CFPB's chief legal officer, in response to executive orders, the agency has been assessing ways to fulfill its statutory duties as a smaller, more efficient operation. Since February 2025, CFPB has taken actions to reduce the size and scope of its activities and staffing. These actions included issuing stop-work orders; closing supervisory examinations; and terminating employees, contracts, and enforcement cases. Some of these actions, such as employee termination, are the subject of ongoing litigation and have not been finalized.² On August 15, 2025, the United States Court of Appeals for the District of Columbia Circuit vacated the district court's injunction that prevented CFPB from taking various personnel actions, terminating certain contracts, and other actions related to downsizing the agency.³ The circuit court panel delayed the effective date of its order to allow the plaintiffs time to request a rehearing.⁴ On December 17, 2025, the circuit court issued an order granting the petition for

¹See Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203 § 1011, 124 Stat. 1376, 1964 (2010) (codified at 12 U.S.C. § 5491).

²See Order on Motion for Preliminary Injunction and Memorandum Opinion, *Nat'l Treas. Emp. Union v. Vought*, No. 1:25-cv-00381 (ABJ) (D.D.C. 2025). ECF No 87 and 88. Also see Order for Stay Pending Appeal and Order Modifying Stay, *Nat'l Treas. Emp. Union v. Vought*, No. 25-5091 (D.C. Cir. 2025) Docs. No. 2110720 and 2113309. The United States Court of Appeals for the Fourth Circuit stayed a district court order granting a preliminary injunction stopping the termination of probationary employees by defendant federal agencies, including CFPB. See *Maryland v. USDA*, No. 24-1248 (4th Cir. 2025), Doc. No. 42. The United States Court of Appeals for the Ninth Circuit denied a motion by the government to stay a district court order enjoining the defendant agencies, including CFPB, from terminating probationary employees. See *Am. Fed'n. of Gov't Emps., AFL-CIO v. OPM.*, No. 25-1677 (9th Cir. 2025), Doc. No. 27. On April 8, 2025, the Supreme Court stayed the district court's preliminary injunction. See *OPM, et al. v. AFGE, et al.*, No. 24A904, 2025 WL 1035208 (U.S. Apr. 8, 2025).

³*Nat'l Treas. Emp. Union v. Vought*, No. 25-5091 (D.C. Cir. 2025), Docs. No. 2130266 and 2130273.

⁴*Id.*, Doc. No. 2130274.

a rehearing *en banc* and vacating the August 2025 order with oral arguments scheduled for February 24, 2026.⁵

You asked us to review the effect of recent stop-work orders, workforce reductions, contract terminations, and other related actions on CFPB's ability to fulfill its statutorily mandated functions. This report describes the status of CFPB's significant reorganization efforts as of August 2025. We will examine the effects of these actions as the subject of a future report.

To produce this report, we analyzed publicly available information on CFPB's reorganization efforts, including court filings involving CFPB, Federal Register notices, press releases, executive orders, memorandums from the Office of Personnel Management and Office of Management and Budget, and nonpublic CFPB documents regarding detailees to the agency (February to August 2025). We also requested a meeting with CFPB officials and information on agency contracts, workforce changes, and supervisory and other activities. CFPB declined to meet with us and did not provide requested information, citing ongoing litigation.

On June 17, 2025, we briefed members of your staff on the preliminary results of our review. Since that briefing, we have updated our slides to include new publicly available information as of August 2025—drawn from legislation, Federal Register notices, and court documents—about changes to CFPB funding, rules, guidance, enforcement actions, and civil investigative demands. This report formally transmits the updated briefing slides (see enc. 1).

In addition, recent congressional actions further affected CFPB's funding, which is included in our scope of review. On July 4, 2025, the President signed into law a reconciliation bill commonly known as the One Big Beautiful Bill Act, which included a provision that reduced CFPB's budget request cap from 12 percent of the Federal Reserve System's total operating expenses for 2009, adjusted annually for changes in labor costs, to 6.5 percent.⁶

We conducted this performance audit from April 2025 to January 2026 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Agency Comments and Our Evaluation

We provided a draft of this report to CFPB for review and comment. In its comments, reproduced in enclosure II, CFPB expressed concerns with the accuracy of the report, stating that the report contains inaccurate, biased, and incomplete information. CFPB stated that the agency was constrained by ongoing litigation from providing all the information and data necessary to correct the report and that it had cooperated and attempted, where possible, to provide accurate data and context. Further, CFPB characterized our timelines for requesting information as limited and arbitrary.

In accordance with our engagement process and agency protocols, we provided CFPB multiple opportunities to inform our work and ensure that we had complete and accurate information. CFPB did not take advantage of any opportunity to provide us with information it considered relevant to our work, only noting that ongoing litigation prevented it from doing so.

⁵*Id.*, Doc. No. 2150928.

⁶Pub L. No. 119-21, tit. III, § 30001, 139 Stat. 72, 126 (codified at 12 U.S.C. § 5497(a)(2)(A)(iii)).

On May 1, 2025, we notified CFPB that we were commencing this work, noting our intention to conduct an entrance conference during the month of May. On May 22, we notified CFPB that our work would conclude with a briefing to our congressional requesters in June and requested a meeting with CFPB officials to gather information for our work. On May 28, we requested documents and answers to questions that would inform our work and then asked for a response by June 6. CFPB declined to meet with us, citing ongoing litigation, but agreed to provide written responses to our questions and document request.⁷ Subsequently, CFPB requested multiple extensions to provide requested information, which we granted. Even with the extensions, CFPB did not respond to our questions as agreed.

We sent CFPB a copy of our draft briefing materials on June 12 to provide another opportunity for agency input before our June 17 briefing and asked for a response by June 13. On June 17, CFPB responded, expressing concerns regarding the accuracy of the draft materials we provided. However, CFPB did not provide any information to identify or correct any supposed inaccuracies.

On August 7, we notified CFPB that we had been requested to publish a report based on our briefing materials and that we would provide CFPB an opportunity to review and comment on the draft report. We also stated that if CFPB would provide responses to our May 28 questions and document request or clarifications to the facts outlined in our June 12 draft briefing materials, we would incorporate them into our draft report. As of the date of this report, we have not received responses to our information and document requests, or any substantive comments on the draft briefing materials we shared with CFPB on June 12.

On August 28, we provided CFPB with our draft report and requested comments by September 18. CFPB requested an extension to provide comments on September 22, to which we agreed. CFPB provided a letter on September 22 that raised concerns with the accuracy of the report, however, it did not identify which facts required correction or provide details to correct any supposed inaccuracies. On September 23, we asked CFPB if it intended to provide any additional information, including technical comments, to address the concerns about the accuracy of the report cited in its letter. CFPB confirmed that it would not provide any additional information.

We stand by the accuracy of the facts presented in our report, which are based on publicly available information including court dockets and Federal Register notices. As consistently explained in our communications to CFPB leadership throughout this audit, we conducted this work within the scope of our authority in an independent and nonpartisan manner, and we take no position on the policies underlying CFPB leadership's views about the agency's past actions or the size of the agency. Our focus was on presenting the dates and events that took place at CFPB between February and August 2025.

⁷CFPB notified us that it was limited in what it could disclose because it was involved in litigation. We informed CFPB that the existence of litigation does not limit our 31 U.S.C. § 716(a)(1) authority to obtain information required for our audits, nor does it minimize CFPB's 31 U.S.C. § 716(a)(2) obligation to provide such information to us. Moreover, the fact that CFPB may be including some of what we requested in its litigation filings seems to minimize the agency's effort to provide it to us. In any event, we consider a number of policy factors, such as ongoing litigation, in determining whether to undertake work within our authority in response to congressional requests. We also consider factors such as the need to timely assist the Congress in performing its constitutional legislative and oversight duties and the nature of the requested work.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees and the Acting Director of the Consumer Financial Protection Bureau. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff members have any questions concerning this report, please contact me at cackleya@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report.

//SIGNED//

Alicia Puente Cackley
Director, Financial Markets and Community Investment

Enclosures - 2

List of Requesters

The Honorable Elizabeth Warren
Ranking Member
Committee on Banking, Housing, and Urban Affairs
United States Senate

The Honorable Andy Kim
Ranking Member
Subcommittee on National Security and International Trade and Finance
Committee on Banking, Housing, and Urban Affairs
United States Senate

The Honorable Maxine Waters
Ranking Member
Committee on Financial Services
House of Representatives

The Honorable Bill Foster
Ranking Member
Subcommittee on Financial Institutions
Committee on Financial Services
House of Representatives

The Honorable Al Green
Ranking Member
Subcommittee on Oversight and Investigations
Committee on Financial Services
House of Representatives

Consumer Financial Protection Bureau: Status of Reorganization Efforts



Consumer Financial Protection Bureau: Status of Reorganization Efforts

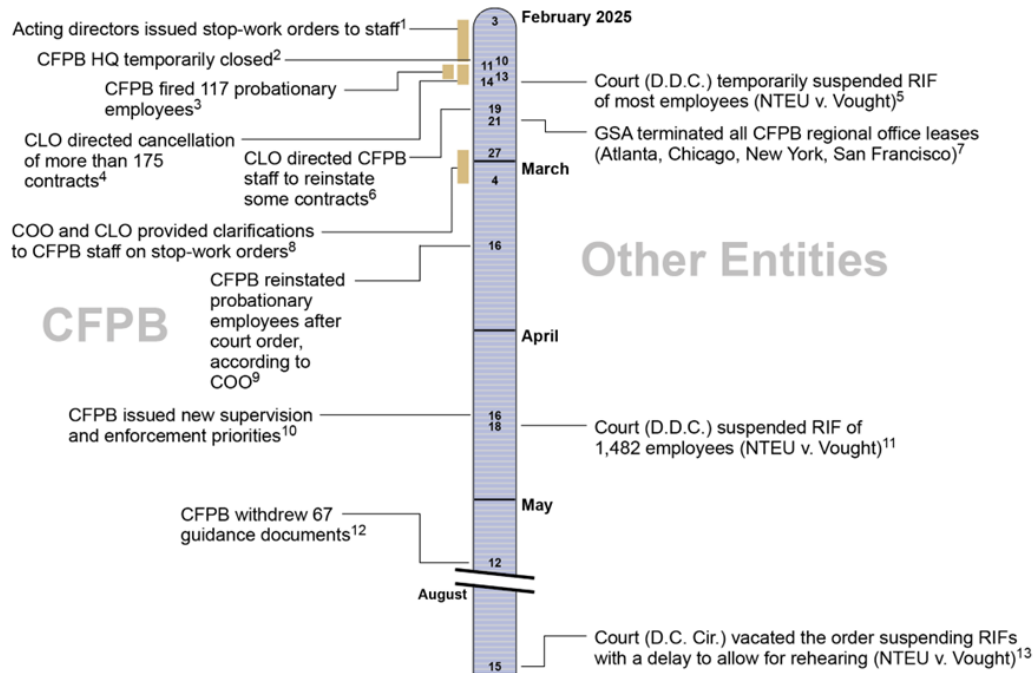
Introduction

- **Origin:** Established in July 2010 under Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act as an independent bureau within the Federal Reserve System.
- **Mission:** To regulate the offering and provision of consumer financial products or services under consumer financial laws, enforce federal consumer financial law fairly and consistently, and to educate and empower consumers making financial decisions.
- **Authority:** To supervise and enforce federal consumer financial laws, handle consumer complaints, promote financial education, and monitor financial markets for risks to consumers. Scope includes banks and nonbanks.

Sources

- **Court dockets including *National Treasury Employees Union v. Vought*, *State of Maryland v. U.S. Department of Agriculture*, *American Federation of Government Employees*, *AFL-CIO v. OPM*, and CFPB enforcement cases:**
 - Consumer Financial Protection Bureau (CFPB) documents, such as memorandums, emails, and interagency communication
 - Office of Personnel Management (OPM) and Office of Management and Budget (OMB) memorandums
 - Declarations
 - Court orders
- **CFPB documents not included in court dockets:**
 - Federal Register notices for guidance and rulemaking
 - Interagency agreements and communication
- **Other documents:**
 - Legislation
 - Executive orders and White House press releases

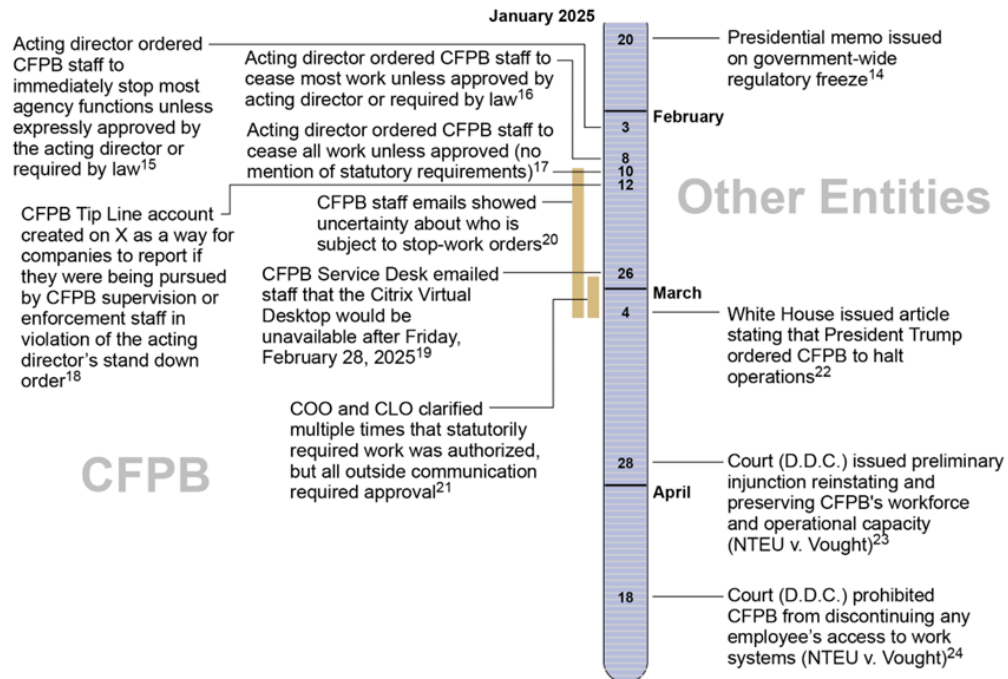
Timeline of Significant Events



Source: GAO analysis of court filings and *Federal Register* notices (endnotes on final slides). | GAO-26-108448

CFPB = Consumer Financial Protection Bureau; CLO = Chief legal officer; COO = Chief operating officer; D.C. Cir. = U.S. Court of Appeals for the District of Columbia Circuit; D.D.C. = U.S. District Court for the District of Columbia; GSA = General Services Administration; HQ = Headquarters; NTEU = National Treasury Employees Union; RIF = Reduction in force

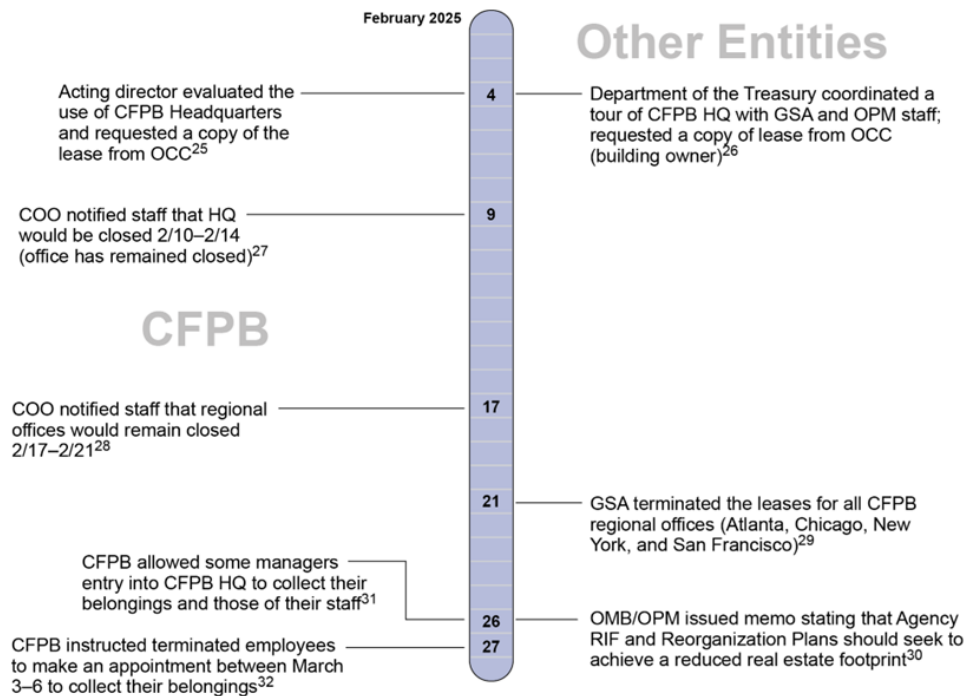
Stop-Work Order Events



Source: GAO analysis of court filings and presidential memorandum (endnotes on final slides). | GAO-26-108448

CFPB = Consumer Financial Protection Bureau; CLO = Chief legal officer; COO = Chief operating officer; D.D.C. = U.S. District Court for the District of Columbia; NTEU = National Treasury Employees Union

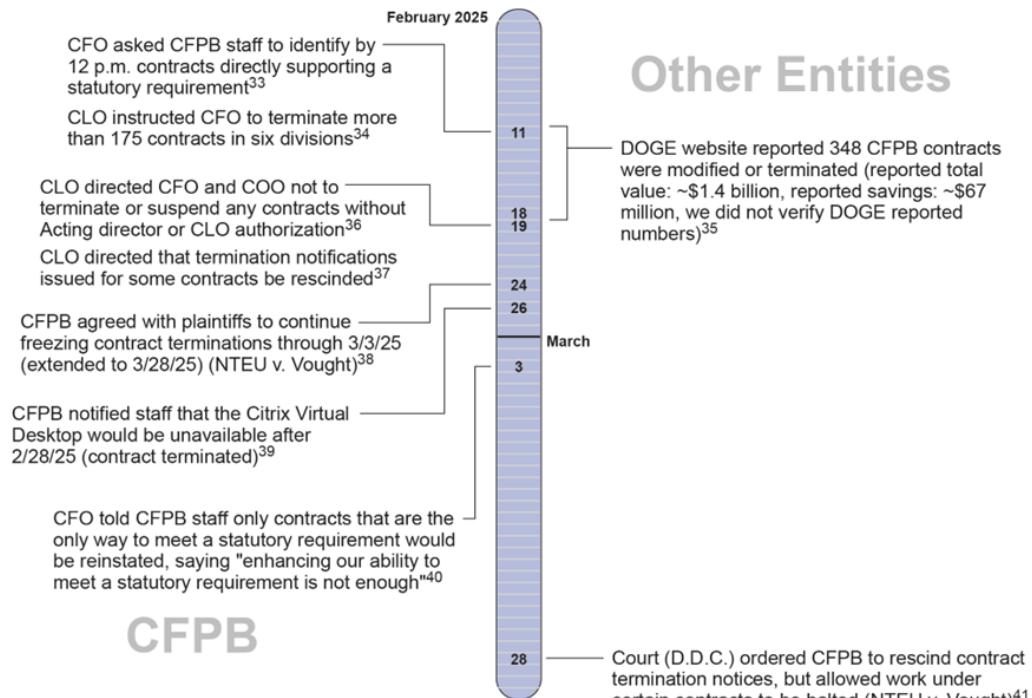
Office Closure Events



Source: GAO analysis of court filings (endnotes on final slides). | GAO-26-108448

CFPB = Consumer Financial Protection Bureau; COO = Chief operating officer; GSA = General Services Administration; HQ = Headquarters; OCC = Office of the Comptroller of the Currency; OMB = Office of Management and Budget; OPM = Office of Personnel Management; RIF = Reduction in force

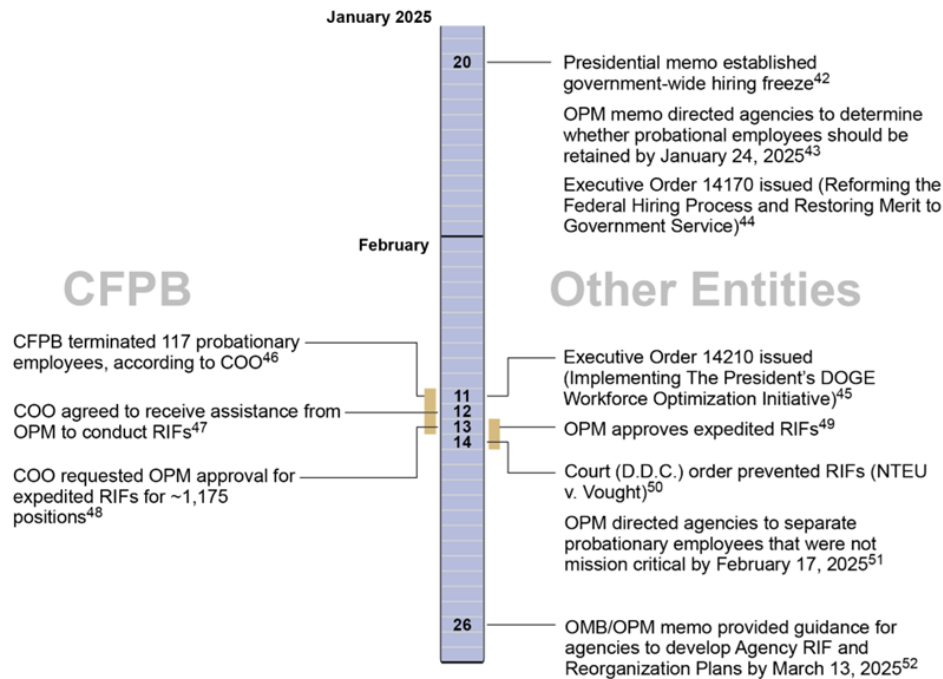
Contract Termination Events



Source: GAO analysis of court filings and contract data from DOGE.gov (endnotes on final slides). | GAO-26-108448

CFO = Chief financial officer; CFPB = Consumer Financial Protection Bureau; CLO = Chief legal officer; COO = Chief operating officer; D.D.C. = U.S. District Court for the District of Columbia; DOGE = Department of Government Efficiency; NTEU = National Treasury Employees Union

Workforce Reduction Events



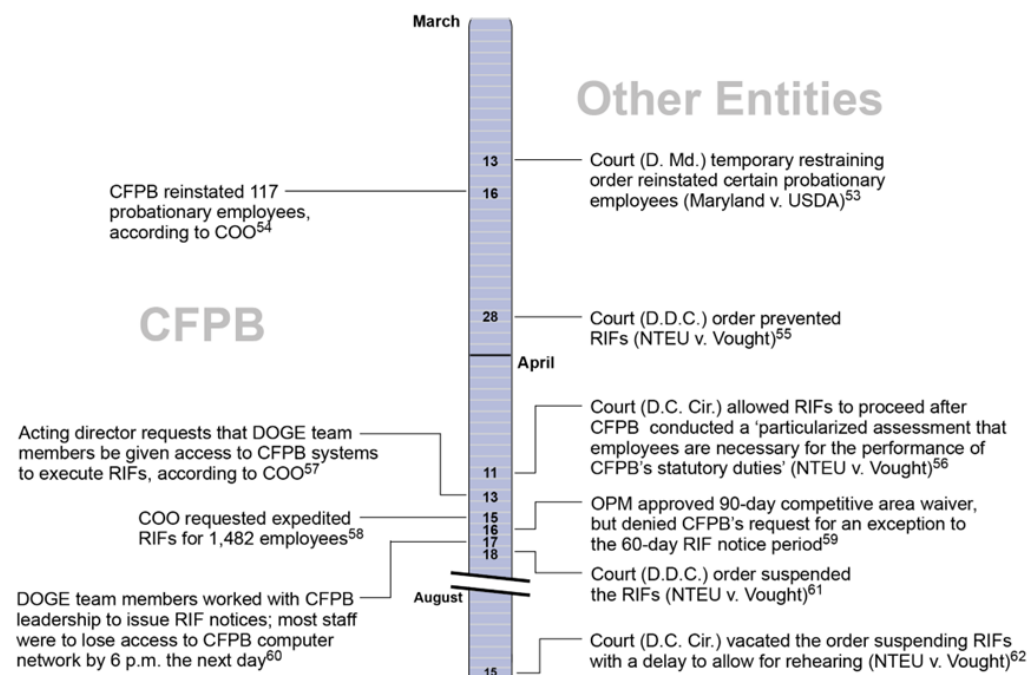
Source: GAO analysis of court filings, presidential memorandum, and executive orders (endnotes on final slides). | GAO-26-108448

Part 1 of 2

CFPB = Consumer Financial Protection Bureau; D.D.C. = U.S. District Court for the District of Columbia; DOGE = Department of Government Efficiency; OMB = Office of Management and Budget; OPM = Office of Personnel Management; NTEU = National Treasury Employees Union; RIF = Reduction in force

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Workforce Reduction Events (cont.)



Source: GAO analysis of court filings (endnotes on final slides). | GAO-26-108448

Part 2 of 2

CFPB = Consumer Financial Protection Bureau; COO = Chief operating officer; D.C. Cir. = U.S. Court of Appeals for the District of Columbia Circuit; D.D.C. = U.S. District Court for the District of Columbia; D. Md. = U.S. District Court of the District of Maryland; DOGE = Department of Government Efficiency; NTEU = National Treasury Employees Union; OPM = Office of Personnel Management; RIF = Reduction in force; USDA = U.S. Department of Agriculture

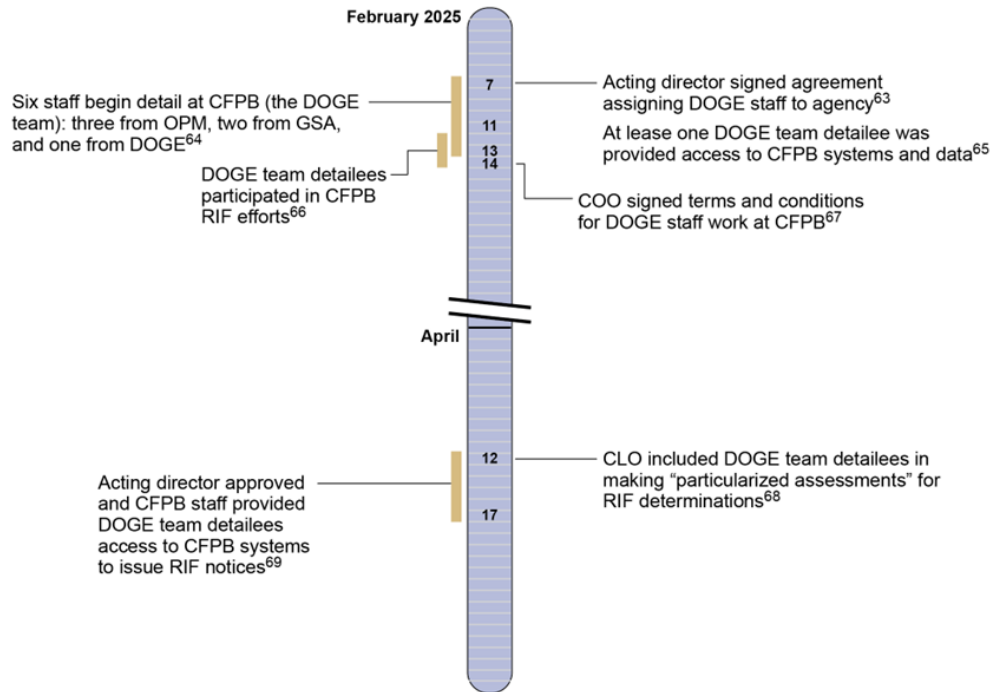
April 17 Planned Reductions in Force (RIF)

Division / Office	Staff Onboard (as of PP6 2025)	Staff Released (RIF)	Staff Retained	% RIF
Supervision Division	487	437	50	90%
Operations Division	323	293	30	91%
Enforcement Division	248	198	50	80%
Research, Monitoring, and Regulations Division	230	208	22	90%
Consumer Response Education Division	149	129	20	87%
Legal Division	87	60	27	69%
Director's Office	86	81	5	94%
External Affairs	41	39	2	95%
Office of the Director's Financial Analysts	29	29	0	100%
Centralized Services	5	5	0	100%
Office of the Ombudsman	4*	3*	1	75%
Total	1689*	1482*	207	88%

Source: *National Treasury Employees Union v. Vought*, Paoletta Decl. ECF No. 109 | GAO-26-108448

Note: This table is based on the numbers presented in the chief legal officer's declaration, which included a spreadsheet showing planned retention and release of staff by division and office. Some numbers from the declaration do not match those in the spreadsheet. Specifically, the numbers marked with asterisks are one employee more in the spreadsheet than the declaration. For example, the total number of staff onboard is 1690 in the spreadsheet and 1689 in the declaration.

DOGE Access Events



Source: GAO analysis of court filings and agency documents (endnotes on final slides). | GAO-26-108448

CFPB = Consumer Financial Protection Bureau; CLO = Chief legal officer; COO = Chief operating officer; DOGE = Department of Government Efficiency; GSA = General Services Administration; RIF = Reduction in force



Examples of Guidance and Rules Withdrawn or Rescinded as of August 18, 2025

- **Guidance withdrawn or rescinded**
 - 7 interpretive rules
 - 8 policy statements
 - 13 advisory opinions
 - 39 other guidance documents
- **In addition, CFPB withdrew or rescinded a number of interpretive and legislative rules, including**
 - Withdrawal of 3 proposed rules
 - Proposed rescission of a number of rules of agency organization that were amended during the previous administration
 - Rescission of one final procedural rule
- **Asserted in court that one final rule exceeded agency authority and asked for a stay of the litigation pending new rulemaking**

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Supervision and Enforcement

- **CFPB released to staff its 2025 supervision and enforcement priorities on April 16, 2025. The priorities include the following:**
 - shift resources away from enforcement and supervision that can be done by states or other regulators,
 - reduce supervisory exams, and
 - shift supervisory focus from nonbanks to banks.

Enforcement Actions as of August 16, 2025

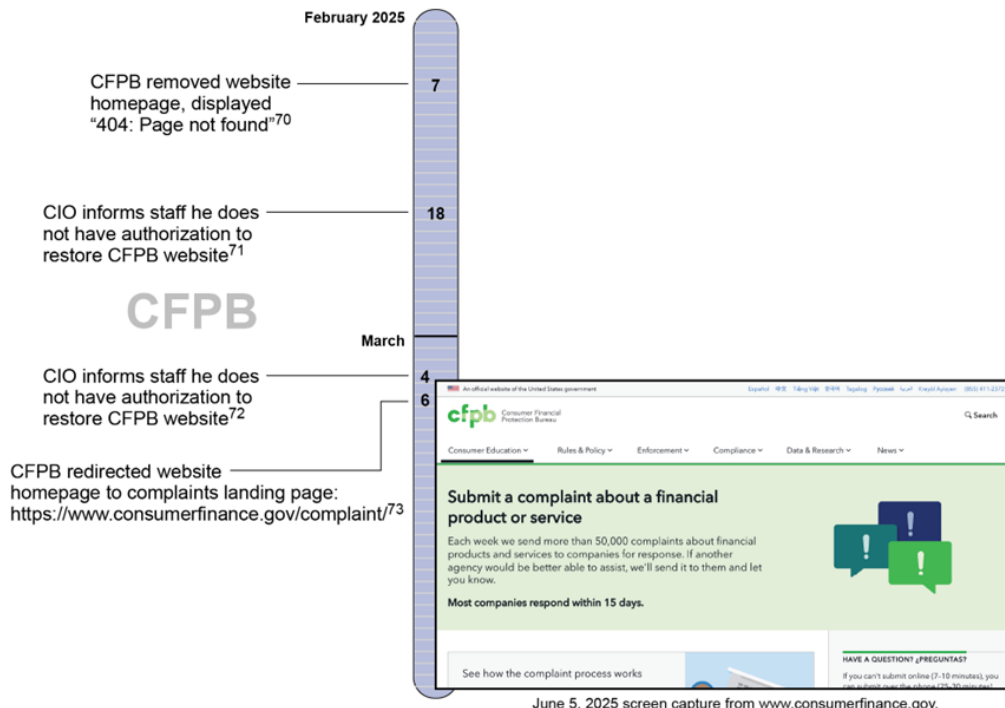
	Enforcement Actions	Civil Investigative Demands	Total
Dismissed with prejudice	16	3	19
Dismissed	1	0	1
Judgement reached	5	0	5
Withdrew as plaintiff	2	0	2
Seeking mediation or settlement	2	0	2
Ongoing	8	1	9
Total	34	4	38

Source: GAO analysis of court filings. | GAO-26-108448

Note: This table includes enforcement actions and petitions to enforce civil investigative demands filed in federal court that were ongoing on January 20, 2025, and shows their status as of August 16, 2025.

- In addition, CFPB sought to vacate or terminate a number of consent orders

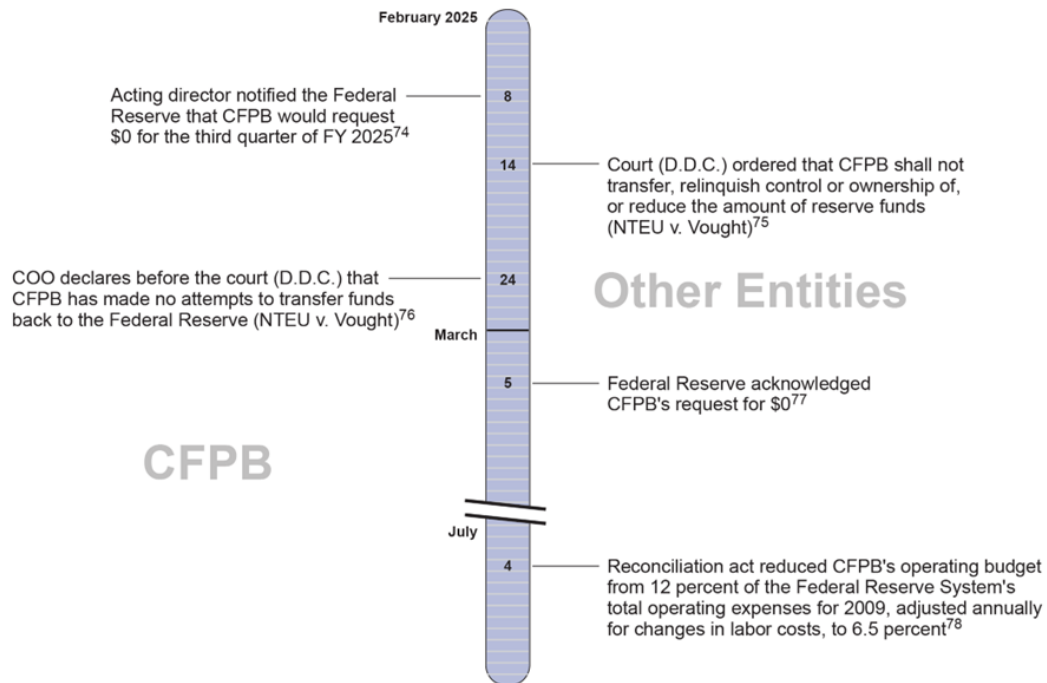
Website Outage Events



Source: GAO analysis of court filings and news report (endnotes on final slides). | GAO-26-108448

CFPB = Consumer Financial Protection Bureau; CIO = Chief information officer

Funding Events



Source: GAO analysis of court filings and legislation (endnotes on final slides). | GAO-26-108448

CFPB = Consumer Financial Protection Bureau; COO = Chief operating officer; D.D.C. = U.S. District Court for the District of Columbia; Federal Reserve = Board of Governors of the Federal Reserve System; FY = Fiscal year; NTEU = National Treasury Employees Union



Abbreviations

CFO	chief financial officer
CFPB	Consumer Financial Protection Bureau
CIO	chief information officer
CLO	chief legal officer
COO	chief operating officer (the individual is also serving as acting chief human capital officer)
D.C.Cir.	United States Court of Appeals for the District of Columbia Circuit
D.D.C.	United States District Court for the District of Columbia
D.Md.	United States District Court for the District of Maryland
DOGE	Department of Government Efficiency
Federal Reserve	Board of Governors of the Federal Reserve System
FY	fiscal year
GSA	General Services Administration
HQ	headquarters
NTEU	National Treasury Employees Union
OCC	Office of the Comptroller of the Currency
OMB	Office of Management and Budget
OPM	Office of Personnel Management
RIF	reduction in force
USDA	U.S. Department of Agriculture



Endnotes

Significant events (slide 4)

¹*National Treasury Employees Union, et al. v. Vought, et al.*, No. 1:25-cv-00381 (ABJ) (D.D.C. 2025), Feb. 3, 2025 email "Instructions from Acting Director," ECF No. 23-1; Martinez Ded. & Exhibits, Feb. 10, 2025 email, ECF No. 31-1; "Additional Directives on Bureau Activities," ECF No. 23-4; Memorandum Opinion, ECF No. 87.

²*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing (amended), Attachment #3, Feb. 9, 2025 email "Please Read: DC Headquarters Building Operating Stat", ECF No. 23-3; Memorandum Opinion, ECF No. 87.

³*National Treasury Employees Union, et al. v. Vought, et al.*, Martinez Ded., ECF No. 82-2.

⁴*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing, Attachment # 1, Feb. 11, 2025 e-mail "Cancellation of CFPB Contracts," ECF No. 56-1.

⁵*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 19.

⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit 2: Defendants' Supplemental Communications, ECF No. 66-2.

⁷*National Treasury Employees Union, et al. v. Vought, et al.*, Notice in Response to Minute Order Regarding the Status of CFPB's Headquarters Lease, ECF No. 95.

⁸*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing, Attachment # 1, Internal CFPB E-mails, ECF No. 56-1; Exhibit Corrected Communications, ECF No. 60-1.

⁹*Maryland, et al. v. USDA, et al.*, No. 1:25-cv-00748 (JKB) (D. Md. 2025), Martinez Ded., ECF No. 52-1.

¹⁰*National Treasury Employees Union, et al. v. Vought, et al.*, Paoletta Decl., ECF No. 109.

¹¹*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 113. On April 11, the U.S. Court of Appeals for the District of Columbia Circuit issued an order allowing terminations and reductions in force of CFPB employees who CFPB determined, after a particularized assessment, to be unnecessary to the performance of CFPB's statutory duties. Following this order, CFPB moved forward with issuing RIFs to most agency employees. Following a motion by the plaintiffs, the District Court issued an order on April 18, halting these RIFs and expressing "significant grounds for concern that the defendants are not in compliance with its Order as it was refined by the Court of Appeals. See Order, ECF 113 at 5.

¹²*Interpretive Rules, Policy Statements, and Advisory Opinions; Withdrawal*, 90 Fed. Reg. 20084 (May 12, 2025).

¹³*National Treasury Employees Union, et al. v. Vought, et al.*, No. 25-5091 (D.C. Cir. 2025), Judgment, Doc. No. 2130266. On September 29 Plaintiff filed a Motion for Rehearing *en banc*.

Stop-work order events (slide 5)

¹⁴Regulatory Freeze Pending Review, Memorandum for the Heads of Executive Departments and Agencies, 90 Fed. Reg. 8249 (Jan. 20, 2025). As defined by the executive order, "rule" also includes "regulatory actions" under Executive Order 12866 and "guidance documents" under Executive Order 13891.

¹⁵*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing (amended), Attachment #1, Feb. 3, 2025 e-mail "Instructions from Acting Director", ECF No. 23-1.



Endnotes (cont.)

¹⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing (amended), Attachment #2, Feb. 8, 2025 e-mail "Directives on Bureau Activities," ECF No. 23-2.

¹⁷*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing (amended), Attachment #4, Feb. 10, 2025 email "Additional Directives on Bureau Activities"; ECF No. 23-4; Memorandum Opinion, ECF No. 87.

¹⁸*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Corrected Communications, ECF No. 60-1.

¹⁹*National Treasury Employees Union, et al. v. Vought, et al.*, Diotalevi Ded., ECF No. 41-1, at 7 and 17.

²⁰*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing, Attachment # 1, Internal CFPB E-mails, ECF No. 56-1; Exhibit Corrected Communications, ECF No. 60-1.

²¹*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing, Attachment # 1, Internal CFPB E-mails, ECF No. 56-1; Exhibit Corrected Communications, ECF No. 60-1.

²²*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Corrected Communications, ECF No. 60-1.

²³*National Treasury Employees Union, et al. v. Vought, et al.*, Memorandum Opinion, ECF No. 87.

²⁴*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 113.

Office closure events (slide 6)

²⁵*National Treasury Employees Union, et al. v. Vought, et al.*, Martinez Ded. & Exhibits, ECF No. 31-1.

²⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Martinez Ded. & Exhibits, ECF No. 31-1.

²⁷*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing (amended), Attachment # 3, Feb. 9, 2025 email "Please Read: DC Headquarters Building Operating Status", ECF No. 23-3; Memorandum Opinion, ECF No. 87.

²⁸*National Treasury Employees Union, et al. v. Vought, et al.*, Diotalevi Ded., ECF No. 41-1.

²⁹*National Treasury Employees Union, et al. v. Vought, et al.*, Notice in Response to Minute Order Regarding the Status of CFPB's Headquarters Lease, ECF No. 95.

³⁰*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit OMB-OPM Memorandum, ECF No. 70-2.

³¹*National Treasury Employees Union, et al. v. Vought, et al.*, Diotalevi Ded., ECF No. 41-1.

³²*National Treasury Employees Union, et al. v. Vought, et al.*, Diotalevi Ded., ECF No. 41-1.

Contract termination events (slide 7)

³³*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Corrected Communications, ECF No. 60-1.

³⁴*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing, Attachment # 1, Internal CFPB E-mails, ECF No. 56-1.



Endnotes (cont.)

³⁶GAO analysis of contract data from DOGE.gov.

³⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit 2: Defendants' Supplemental Communications, ECF No. 66-2.

³⁷*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit 2: Defendants' Supplemental Communications, ECF No. 66-2.

³⁸*National Treasury Employees Union, et al. v. Vought, et al.*, Declaration of Deepak Gupta, ECF No. 41-2; Joint Notice of Agreement Concerning Contract Terminations Pending March 10 Evidentiary Hearing, ECF No. 53; Joint Notice of Agreement Concerning Contract Terminations, ECF No. 69; Joint Notice of Agreement Concerning Contract Terminations, ECF No. 71.

³⁹*National Treasury Employees Union, et al. v. Vought, et al.*, Diotalevi Dec., ECF No. 41-1.

⁴⁰*National Treasury Employees Union, et al. v. Vought, et al.*, Notice of Filing, Attachment # 1, Internal CFPB E-mails, ECF No. 56-1.

⁴¹*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 88.

Workforce reduction events (slides 9-10)

⁴²Hiring Freeze, Memorandum for the Heads of Executive Departments and Agencies, 90 Fed. Reg. 8247 (Jan. 20, 2025).

⁴³<https://www.opm.gov/media/yh3bv2fs/guidance-on-probationary-periods-administrative-leave-and-details-1-20-2025-final.pdf>.

⁴⁴Executive Order 14170, Reforming the Federal Hiring Process and Restoring Merit to Government Services, 90 Fed. Reg. 8621 (Jan. 30, 2025).

⁴⁵Executive Order 14210, Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative, 90 Fed. Reg. 9669 (Feb. 11, 2025).

⁴⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Martinez Dec., ECF No. 82-2.

⁴⁷*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit 1: Plaintiffs' Supplemental Communications, ECF No. 66-1.

⁴⁸*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit 1: Plaintiffs' Supplemental Communications, ECF No. 66-1.

⁴⁹*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit 1: Plaintiffs' Supplemental Communications, ECF No. 66-1. On February 13, 2025, OPM approved the 90-day competitive area exception. In a letter dated February 14, 2025, OPM approved CFPB's February 13, 2025 request for an exception to the 60-day RIF notice period given to employees; OPM's approval excluded the Office of the Director/Office of Civil Rights.

⁵⁰*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 19.

⁵¹*American Federation Of Government Employees, AFL-CIO v. United States Office of Personnel Management*, No. 3:25-cv-01780 (WHA) (N.D. Cal. 2025), Attachment B, ECF No. 37-1.

⁵²<https://www.opm.gov/policy-data-oversight/latest-memos/guidance-on-agency-rif-and-reorganization-plans-requested-by-implementing-the-president-s-department-of-government-efficiency-workforce-optimization-initiative.pdf>.



Endnotes (cont.)

⁶³*Maryland, et al. v. USDA, et al.*, No. 1:25-cv-00748 (JKB) (D. Md. 2025), Temporary Restraining Order, ECF No. 44; Order, ECF No. 126.

⁶⁴*Maryland, et al. v. USDA, et al.*, Martinez Dec., ECF No. 52-1.

⁶⁵*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 88.

⁶⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Order, No. 25-5091 (D.C. Cir. 2025), Doc. No. 2110720.

⁶⁷*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Filed in Response to the Court's April 21, 2025 Order [Dkt. #131-1].

⁶⁸*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Filed in Response to the Court's April 21, 2025 Order, ECF No. 131-1, Exhibit 3.

⁶⁹*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Filed in Response to the Court's April 21, 2025 Order, ECF No. 131-1, Exhibit 34.

⁷⁰*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 113; Exhibit Filed in Response to the Court's April 21, 2025 Order, ECF No. 137-1, at 76 and 116-121.

⁷¹*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 113.

⁷²*National Treasury Employees Union, et al. v. Vought, et al.*, Judgment, No. 25-5091 (D.C. Cir. 2025), Doc. No. 2130266.

DOGE access events (slide 12)

⁷³Executive Office of the President, "U.S. DOGE Service: Assignment Agreement, Bureau of Consumer Financial Protection" (Washington, D.C.: Feb. 7, 2025).

⁷⁴Certifications of compliance for two detailees from the Office of Personnel Management to the Consumer Financial Protection Bureau (Washington, D.C.: Feb. 7, 2025). Certifications of compliance for two detailees from the General Services Administration to the Consumer Financial Protection Bureau (Washington, D.C.: Feb. 7, 2025, and Feb. 11, 2025). Certification of compliance for one detailee from the Executive Office of the President, Department of Government Efficiency, to the Consumer Financial Protection Bureau (Washington, D.C.: Feb. 10, 2025). Office of Personnel Management and the Consumer Financial Protection Bureau, "Non-Reimbursable Detail Base Agreement," memorandum of understanding (Washington, D.C.: Feb. 13, 2025).

⁷⁵*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit List and Docketing of Exhibits, DX-02 CFPB_00258-259: Email re: Re: Specific Notice of RIF Template, ECF No. 128-2.

⁷⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit 1: Plaintiffs' Supplemental Communications, ECF No. 66-1.

⁷⁷Executive Office of the President, "U.S. DOGE Service: Terms and Conditions for Reimbursable and Non-Reimbursable Work, Consumer Financial Protection Bureau (CFPB)" (Washington, D.C.: Feb. 14, 2025).

⁷⁸*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit List and Docketing of Exhibits, DX-02 CFPB_00258-259: Email re: Re: Specific Notice of RIF Template, ECF No. 128-2.

⁷⁹*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Filed in Response to the Court's April 21, 2025 Order, ECF No. 137-1, at 76-142.



Endnotes (cont.)

Website outage events (slide 16)

⁷⁰<https://web.archive.org/web/20250208031534/http://www.consumerfinance.gov/>.

⁷¹*National Treasury Employees Union, et al. v. Vought, et al.*, Scott Decl., ECF No. 38-6.

⁷²*National Treasury Employees Union, et al. v. Vought, et al.*, Exhibit Corrected Communications, ECF No. 60-1.

⁷³<https://web.archive.org/web/20250306233153/https://www.consumerfinance.gov/>.

Funding events (slide 17)

⁷⁴https://files.consumerfinance.gov/documents/ctpb_letter-from-frb-to-ctpb_2025-02.pdf.

⁷⁵*National Treasury Employees Union, et al. v. Vought, et al.*, Order, ECF No. 19.

⁷⁶*National Treasury Employees Union, et al. v. Vought, et al.*, Martinez Decl. & Exhibits, ECF No. 31-1.

⁷⁷Memorandum (no subject line) from the Board of Governors of the Federal Reserve System, Division of Financial Management, to the Consumer Financial Protection Bureau (Washington, D.C.: Mar. 5, 2025).

⁷⁸Pub. L. No. 119–21, tit. 3, § 30001, 139 Stat. 72, 126 (2025) (codified at 12 U.S.C. § 5497(a)(2)(A)(iii)).

Enclosure II

Comments from the Consumer Financial Protection Bureau



1700 G Street, N.W., Washington, DC 20552

September 22, 2025

Alicia Puente Cackley
Director, Financial Markets and Community Investment
Government Accountability Office
441 G Street, NW
Washington DC, 20548

Dear Ms. Cackley:

The Consumer Financial Protection Bureau (“CFPB” or “Bureau”) writes this letter to comment on the Government Accountability Office’s (GAO) draft report, titled *Consumer Financial Protection Bureau: Status of Reorganization Efforts* (GAO-25-108448) (“the Report”). During GAO’s engagement with CFPB, the Bureau informed GAO of several serious concerns regarding the inaccuracies and misinformation with the Report. Regrettably, GAO has not taken any efforts to address the Bureau’s concerns.

First, GAO’s Report, initiated at the behest of hyper-partisan Democrat Members, is full of biased and incomplete information, continuing its efforts to undermine President Trump’s and Acting Director Vought’s efforts to reform and right-size the CFPB, which has a history of weaponization.

For too long, the CFPB has been targeting companies they disfavored, simply based on services they provide, such as payday lending or the leasing of firearms, to extort millions of dollars in penalties and redress, with no connection to actual consumer harm. In fact, many of the CFPB’s actions in the past actually harmed consumers by taking away options in the marketplace that could address their needs.

Congress agrees with Acting Director Vought’s efforts to right-size this bloated agency as evidenced by its decision to cut the Bureau’s funding nearly in half in the One Big Beautiful Bill Act. In the meantime, CFPB’s new leadership team is uncovering and implementing measures to address the agency’s profligate spending.

Second, as CFPB indicated to GAO on multiple occasions, the Bureau is engaged in litigation over essentially all aspects of the Report. See *National Treasury Employees Union v. Russell Vought*, No. 25-5091 (CADCA). As such, the Bureau is constrained from providing all the information and data necessary to correct GAO’s misleading assertions in the Report. Nonetheless, GAO advanced this Report relying on incomplete information, including court filings containing inaccurate assertions advanced by hostile litigants. This approach is inconsistent with an effort to produce sound information, and instead represents an attempt to issue false and misleading information regarding the Bureau on behalf of partisan Democrats in Congress.

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Last, despite the serious flaws with the Report's accuracy and GAO's inappropriate intent, CFPB staff have cooperated and attempted, where possible, to provide accurate data and context in the limited and arbitrary timelines set by GAO.

It is the Bureau's sincere hope that GAO will arrest its efforts to produce biased and flawed materials to smear President Trump's historic reform efforts.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Paoletta', written in a cursive style.

Mark Paoletta
Chief Legal Officer

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