

The audit to which I am responding can be found at:

https://files.consumerfinance.gov/f/documents/cfpb_supervisory-highlights_issue-32_2024-04.pdf

Here's what I noticed, in it.

The Intro: Kudos on telling it like it is. "Accuracy in consumer reports is of vital importance..."
"Inaccuracy in the credit reporting system is a long standing issue that remains a problem today."
The latter, in fact, would be an understatement.

Page 4 says, in the last paragraph, "To maintain anonymity of the supervised institutions ..." and goes on to say how that anonymity is maintained.



Yet anonymity is the problem:
not the solution.

In my situation, still ongoing, for over a decade, it was furtive unnamed actors within the CFPB, who rubber stamped the ID Theft, and provided the petticoats for ID thieves hiding behind the bad credit bureaus, in turn, to hide behind.

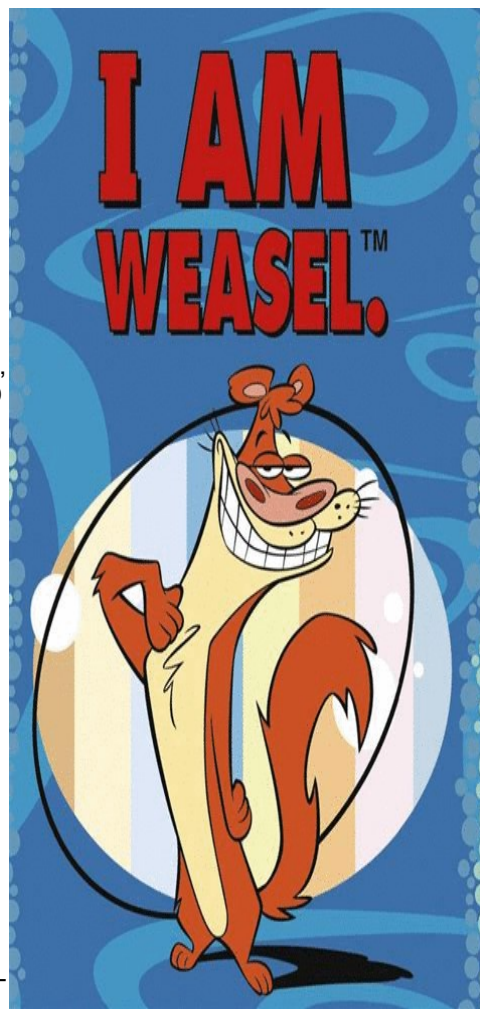
See IDT Mining -
https://drive.google.com/file/d/1H7f_1weLAacKrXDYF7s9xphVVLy9RfIF/view?usp=share_link

None of the problems in the doc referenced at the url above, have become, and then remained, fixed, in all these years. And the SSA, since then, has reverted to using third parties (such as bad credit bureaus, for instance) to, "verify" (read: lie, and refuse refutations of those lies) its data. Likewise, the state's HSD division.

Furtive weasels (furnishers) concealed who in the world they were, from me. Actors within the CFPB even provided the petticoats, to help them slither around. Yet these same "providers" of - - - false - - - info on me, wanted MY gov docs and/or the info contained in them!!!!

They were clearly doing identity theft (IDT) on me! You've got to be nuts, expecting anyone to knowingly share that kind of info with obvious ID Thieves!

And, they outright refused - ever, to duly provide me my Credit Reports. Yet demanded I present/use those secretive, furtive, reports, when disputing their fiction on my good name.



page 5:

"The FCRA requires CRCs to block the reporting of any info in a consumer's file that the consumer IDs as ... [coming from] IDT..."

While the observation that CRCs violate this law is no doubt correct; in my case, it's worse than that. CRC's refused to duly cough up the, "info in a consumer file" (Credit Report).

Page 6, section 2.1.2

Here, the CFPB noted that the CRCs failed to duly provide consumers with notice that they'd blown off rescinding bad info.

In my case, this was, unfortunately, logical. The CRC's hid the IDs of the ID Thieves using their jobs as fronts, within those CRC's, to target me, specifically, for IDT. So, well, Duh! Of COURSE they failed to provide me with notice they were blowing off rescinding their bad info on me.

And so I'm not surprised at any of the other findings.

2.1.3 You nailed this one.

2.2.3 Furnishers deleted the tradeline rather than do their job. As an outsider learning of this Regulation V violation, it seems that there must be some incentive, to do this. Are job performance reviews based on pseudo "productivity?"

I used to work in a lab. I could have invented test results. It would have saved me a lot of time, and ground out results much faster than running the tests. But it would have costed patients their lives. Yet the fact remains, had I been unethical enough to do so, (I wasn't) it would have looked like, "productivity," on paper.

2.2.5 Furnishers weren't acting as they should, upon receipt from a consumer, of an IDT report. While it's a good thing that the CFPB noted this, in my situation, it was even worse. Hijackers within the CFPB hid the ID's of the furnishers, from me. So did the CRCs. So I wouldn't have even been able to send anyone the IDT reports, even had furnishers bothered to obey their FCRA duties, concerning those IDT reports.

4.1.2 Kudos on going after one of the Credit Bureaus. While this was over TransUnion failing to place or remove security freezes, a larger issue is the hiding of furnisher ID's.

Now, go after the other Credit Bureaus, as well.

What's Right:

Doing these reports. And cleanly fessing up to how awful it is.

What's Glaringly Wrong:

A. Make everyone fully fess up as to who they are, to consumers (revise policies).

B. Again and again; How did the CFPB address the problems it found? Told the guilty to revise their policies to obey FCRA law. Big deal: What's the consequence, if they don't? There should be at least 2.

1. Pay and other financial reward must dry up. Maybe even fine them.
2. Jail.

Consequences should occur within a deadline.

If the CFPB isn't willing to do the above, then these audits are just a bunch of refined presentation, with no substance. They won't be a trend in the right direction.