

May 2017

# Monthly Complaint Report

Vol. 23



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# 1. Introduction

The Consumer Financial Protection Bureau (CFPB) is the first federal agency solely focused on consumer financial protection,<sup>1</sup> and consumer complaints<sup>2</sup> are an integral part of that work. The CFPB helps connect consumers with financial companies to make their voices heard. When consumers submit a complaint, we work with companies to get the consumer a response, generally within 15 days. We also publish basic information about complaints in our public Consumer Complaint Database to empower consumers, inform consumer advocates and companies, and improve the functioning of the marketplace.

This Monthly Complaint Report provides a high-level snapshot of trends in consumer complaints submitted by “older consumers.” Older consumers are defined as consumers who voluntarily reported their age as 62 or older. Consumers have voluntarily reported their age in 54 percent of complaints.

Visit [consumerfinance.gov/complaint](http://consumerfinance.gov/complaint) to learn about how we handle complaints or to submit a complaint. Visit our Consumer Complaint Database at [consumerfinance.gov/complaintdatabase](http://consumerfinance.gov/complaintdatabase) to search, sort, filter, and export complaints.<sup>3</sup>

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<sup>1</sup> The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, Pub. L. No. 111-203 (“Dodd-Frank Act”) created the CFPB to protect consumers of financial products or services and to encourage the fair and competitive operation of consumer financial markets.

<sup>2</sup> Consumer complaints are submissions that express dissatisfaction with, or communicate suspicion of wrongful conduct by, an identifiable entity related to a consumer’s personal experience with a financial product or service.

<sup>3</sup> This report is based on dynamic data and may slightly differ from other public reports. Complaints referred to other regulators, such as complaints about depository institutions with less than \$10 billion in assets, are not published in the Consumer Complaint Database.

## 2.Older consumer complaints

The CFPB began complaint handling operation on July 21, 2011.<sup>4</sup> As of April 1, 2017, the CFPB has handled approximately 1,163,200 complaints, of which 54 percent of consumers have voluntarily reported their age. Of those, approximately 103,000 have come from consumers who report that they are 62 years or older<sup>5</sup>. This includes approximately 2,200 older consumer complaints in March 2017.

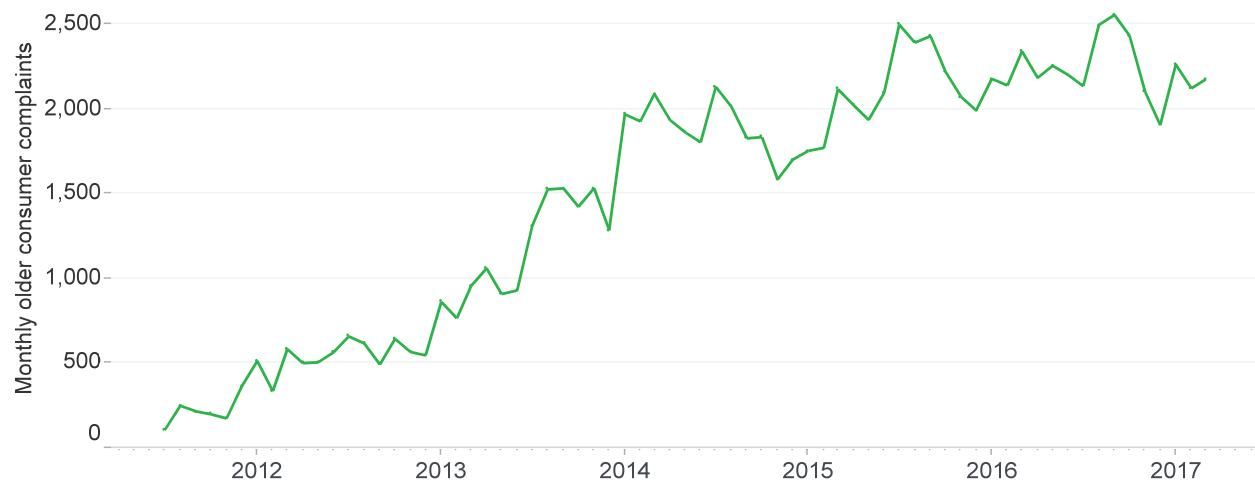
Average monthly older consumer complaints decreased 1 percent from January 2016 through March 2016 (2,214 complaints per month) to January 2017 through March 2017 (2,181 complaints per month), lower than the 19 percent increase for all consumers.

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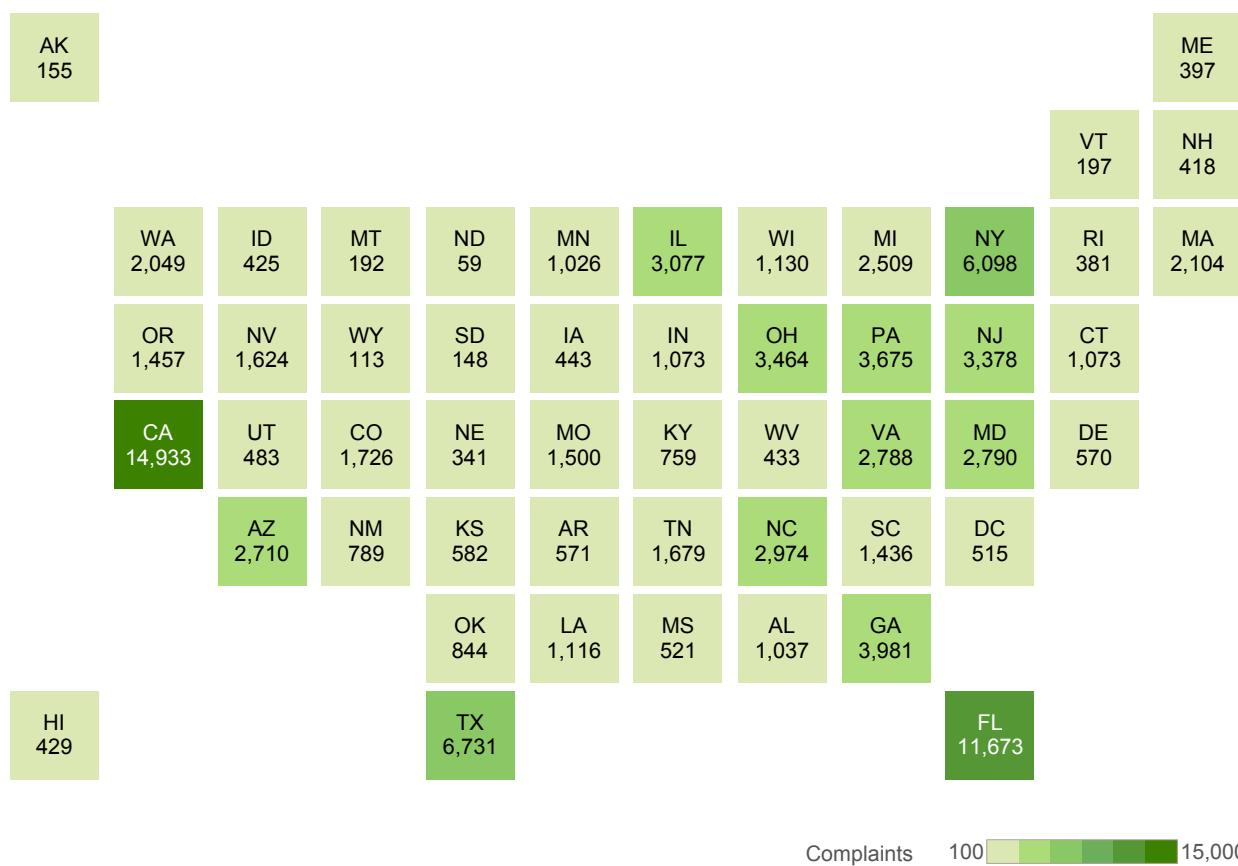
<sup>4</sup> The CFPB has used a phased-in approach to expand its complaint handling over time to include multiple products and services under its authority. Complaint-handling capacity was expanded as follows: credit card complaints on July 21, 2011, mortgage complaints on December 1, 2011, bank accounts and services, private student loans, and consumer loans on March 1, 2012, credit reporting on October 22, 2012, money transfers on April 4, 2013, debt collection on July 10, 2013, payday loans on November 6, 2013, prepaid cards, credit repair, debt settlement, and pawn and title loans on July 19, 2014, and virtual currency on August 11, 2014. See Table 2.

<sup>5</sup> This information was updated in the report on 06/22/2017 in order to better clarify the data.

**FIGURE 1: OLDER CONSUMER MONTHLY COMPLAINT VOLUME TREND**



**FIGURE 2: COMPLAINTS FROM OLDER CONSUMERS HANDLED FROM JULY 21, 2011, THROUGH MARCH 31, 2017 (BY STATE, AND THE DISTRICT OF COLUMBIA)**



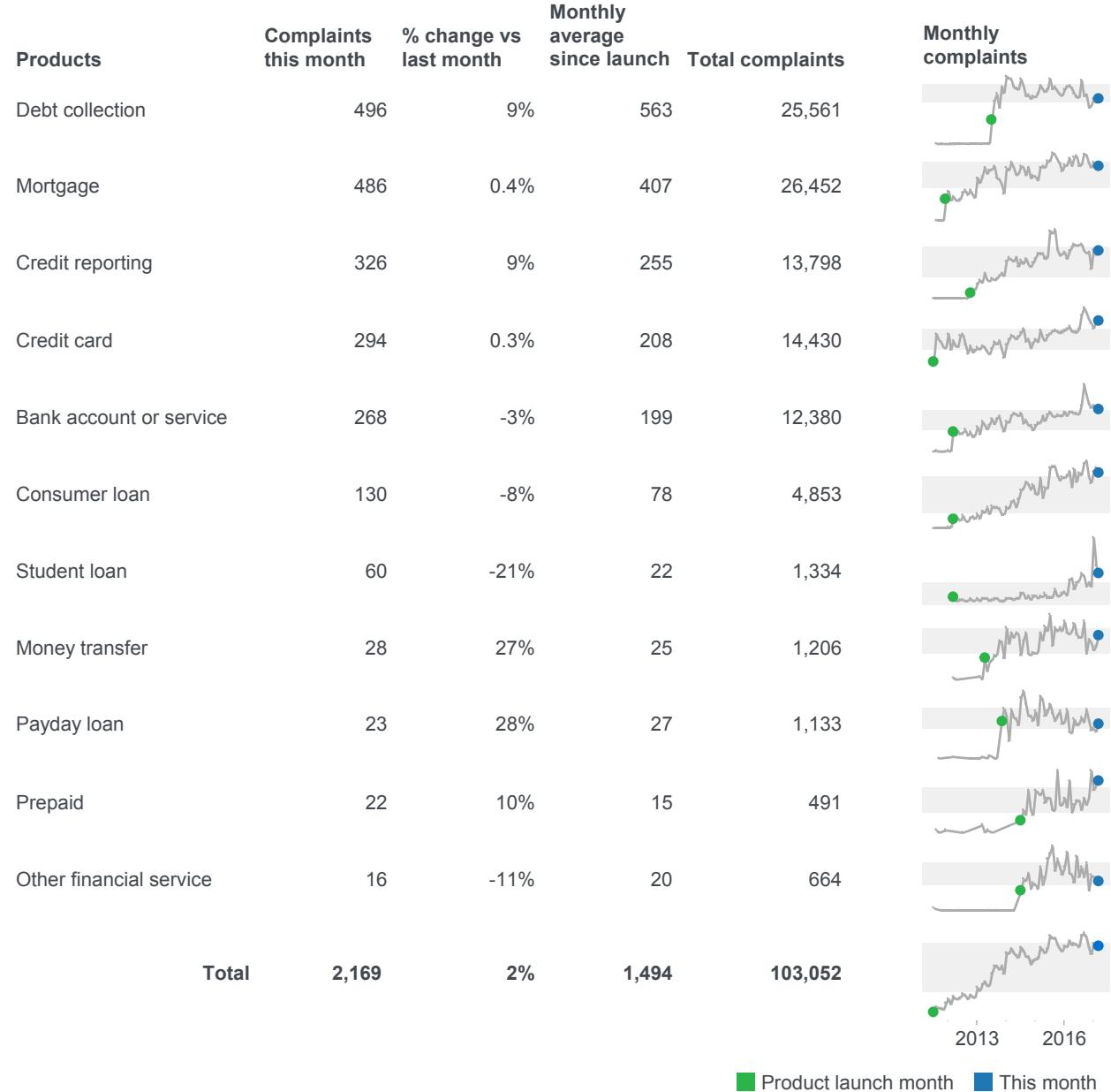
# 3.Older consumer complaints by product

The CFPB continually strives to collect reliable complaint data while ensuring the system's ease-of-use and effectiveness for consumers. When consumers submit complaints, they select the consumer financial product or service as well as the issue they are having with that product or service from a list. This provides structured data that can be used to group complaints to get a sense of which financial products and services consumers complain about and what issues they are having in the marketplace.

We also collect unstructured data from consumers and companies during the complaint process. The consumer's narrative description of what happened, consumer-provided documents, the company's response, and company-provided documents are examples of unstructured data. The Bureau uses a variety of approaches to analyze consumer complaints including, for example, cohort and text analytics to identify trends and possible consumer harm. Our review and analysis of unstructured data offers deeper insights into older consumers' complaints and helps the Bureau understand problems they are experiencing.

Table 1 shows the complaint volume for older consumers this month by product. The graphic at the end of each row under the heading "Monthly complaints" shows the volume trend from when the CFPB began accepting complaints about that product (green bullet) to the current month (blue bullet). The monthly average reflects complaints handled per month since we began accepting those complaints.

**TABLE 1: OLDER CONSUMER MONTHLY PRODUCT TRENDS<sup>6</sup>**

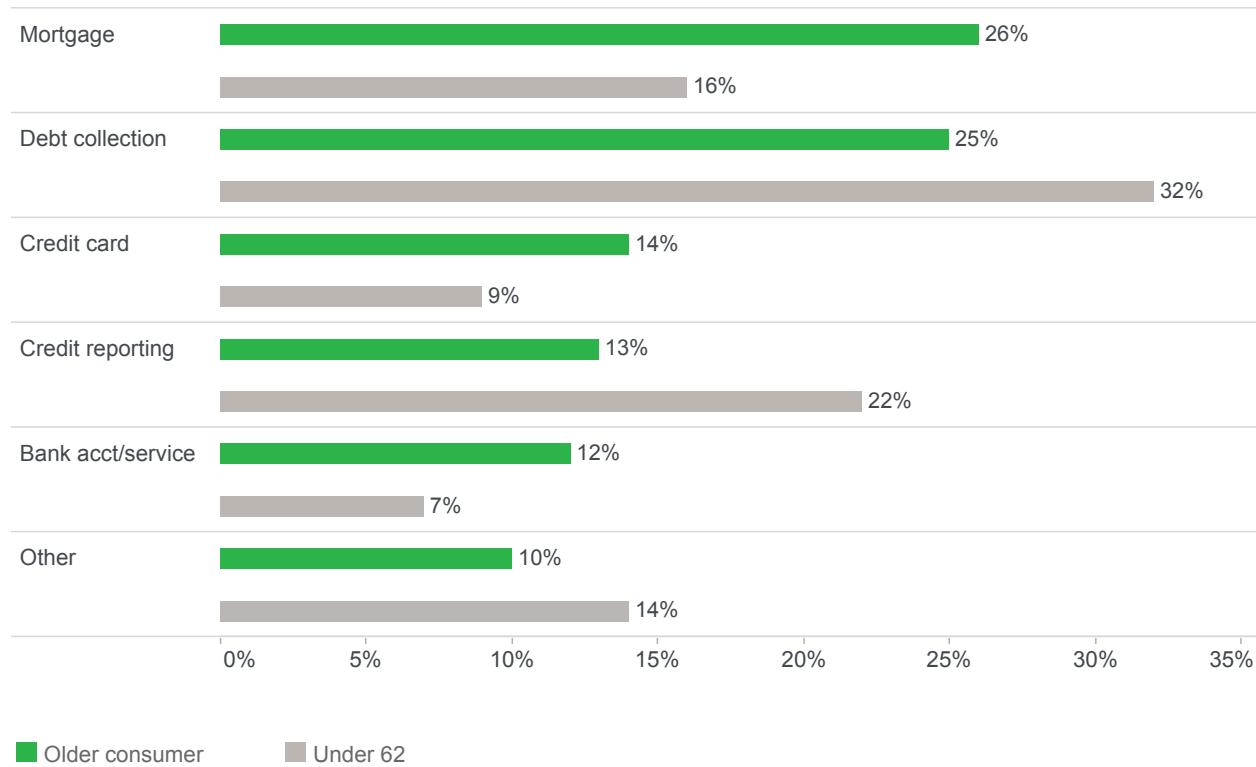


- Debt collection, mortgage and credit reporting were the top three most-complained-about consumer financial products and services, collectively representing about 60 percent of older consumer complaints submitted in March 2017.

<sup>6</sup> Gray bars show +/- 1 standard deviation for monthly complaints since we began accepting those complaints. Total complaints column includes 750 older consumer complaints where no specific consumer financial product was selected by consumers.

Figure 3 shows the distribution of complaints by product from older consumers and consumers under age 62 from the 54% who voluntarily provided their age.

**FIGURE 3: OLDER CONSUMER VS. UNDER 62 CONSUMER COMPLAINTS BY PRODUCT HANDLED FROM JULY 21, 2011, TO MARCH 31, 2017**



- Twenty-six percent of complaints from older consumers were related to mortgages, higher than the 16 percent of complaints from non-older consumers.
- Twenty-five percent of complaints from older consumers were related to debt collection, lower than the 32 percent of complaints from non-older consumers.
- Fourteen percent of complaints from older consumers were related to credit cards, higher than the 9 percent of complaints from non-older consumers.
- Twelve percent of complaints from older consumers were related to bank accounts and services, higher than the seven percent of complaints from non-older consumers.

Figure 4 shows the types of mortgage complaints older consumers submitted as a percentage of all older consumer mortgage complaints handled since July 2011. The most common issues

identified by older consumers are problems when unable to pay (loan modification/collection/foreclosure) (40 percent), making payments (loan servicing/payments/escrow accounts) (39 percent), and applying for the loan (application/originator/mortgage broker) (12 percent).

**FIGURE 4: TYPES OF MORTGAGE COMPLAINTS REPORTED BY OLDER CONSUMERS**

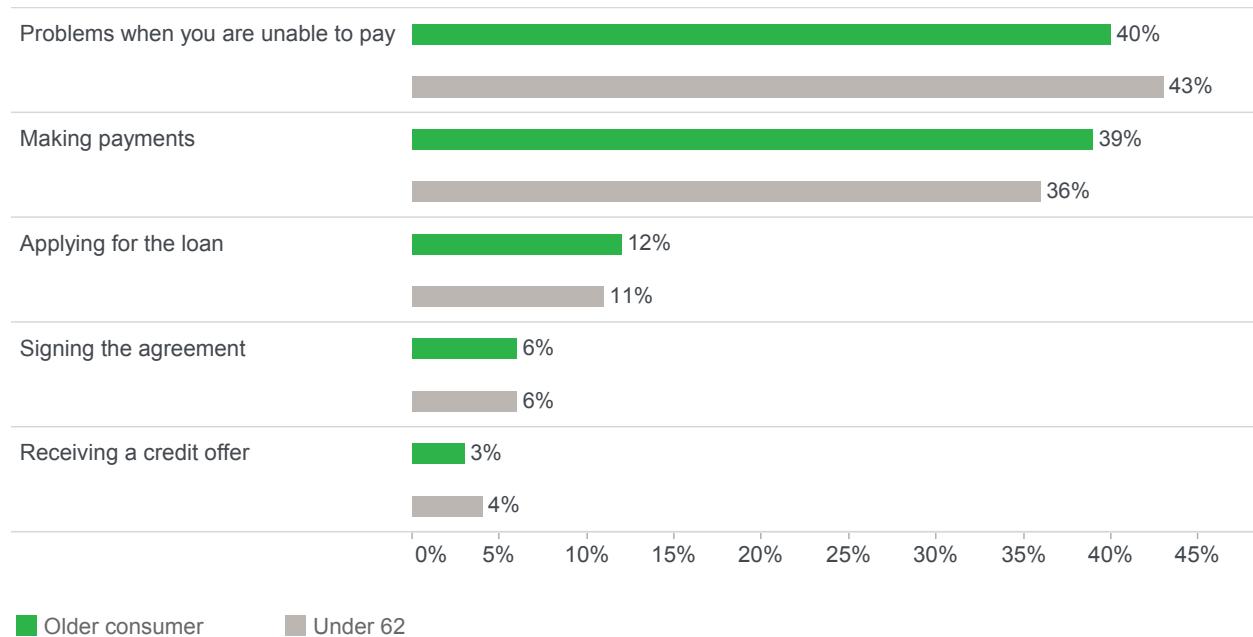
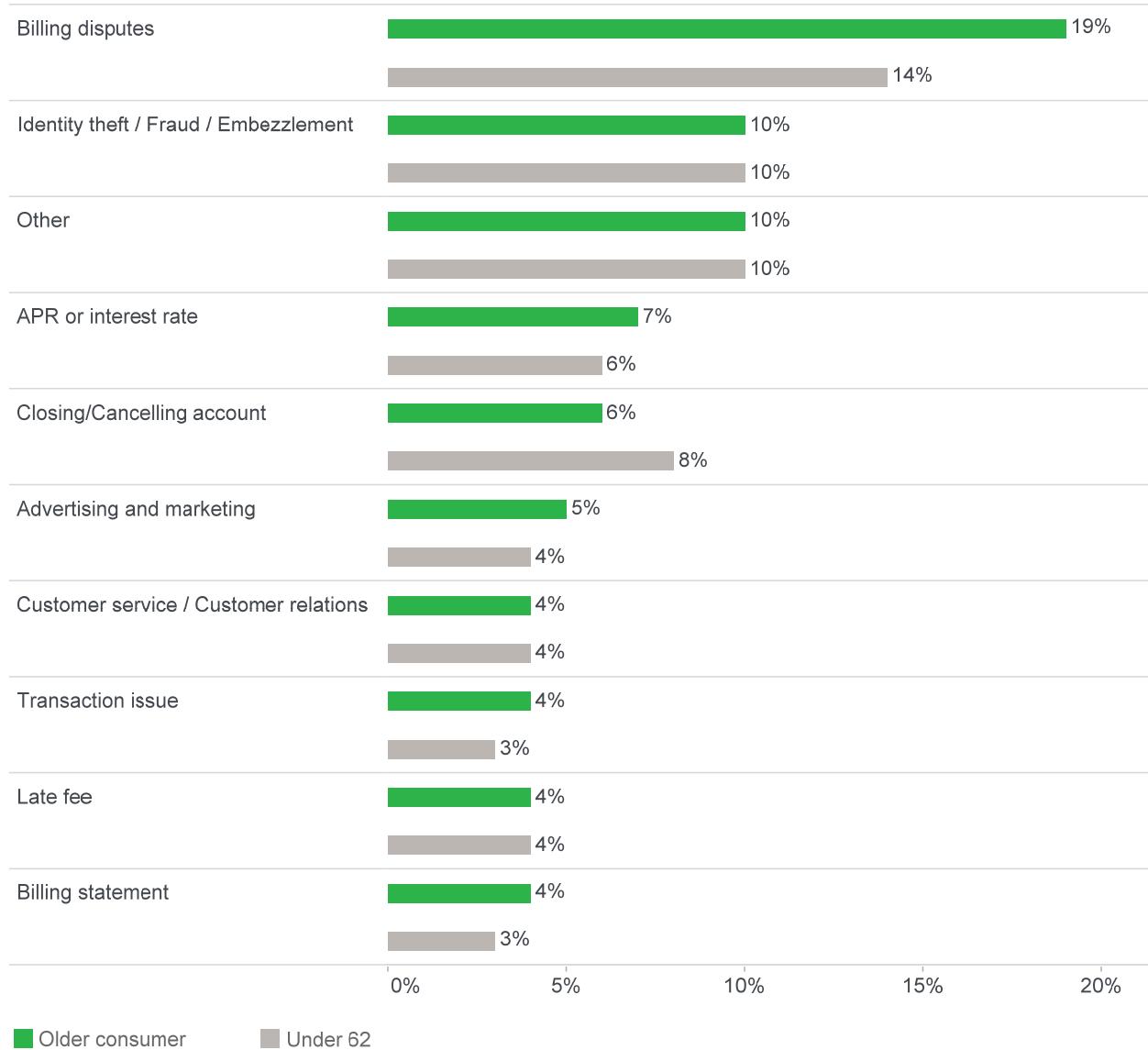


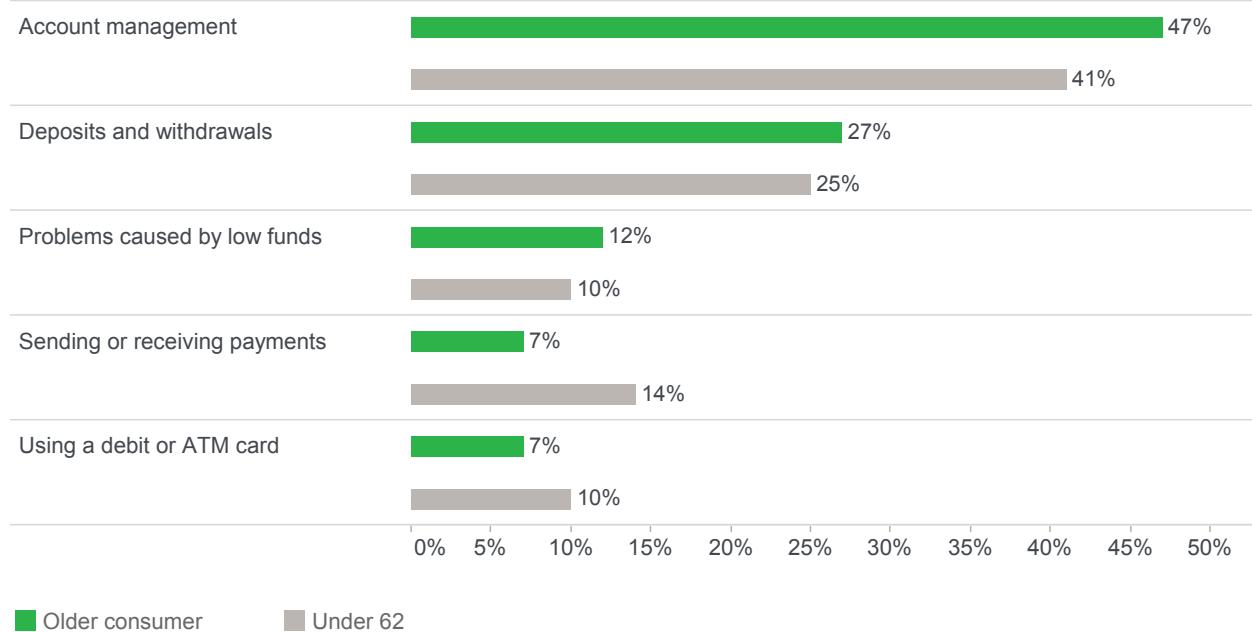
Figure 5 shows the types of credit card complaints older consumers submitted as a percentage of all older consumer credit card complaints handled since July 2011. The most common issues identified by consumers are problems with billing disputes (19 percent), identity theft/fraud/embezzlement (10 percent), and other (10 percent).

**FIGURE 5: TYPES OF CREDIT CARD COMPLAINTS REPORTED BY OLDER CONSUMERS**



Consumers submit complaints about accounts or services offered by banks, credit unions and nonbank companies under the general category of “bank accounts or services.” Figure 6 shows the types of bank account or service complaints older consumers submitted as a percentage of all older consumer bank account or service complaints handled since July 2011. The most common issues identified by older consumers are problems with account management (47 percent), deposits and withdrawals (27 percent), and problems caused by low funds (12 percent).

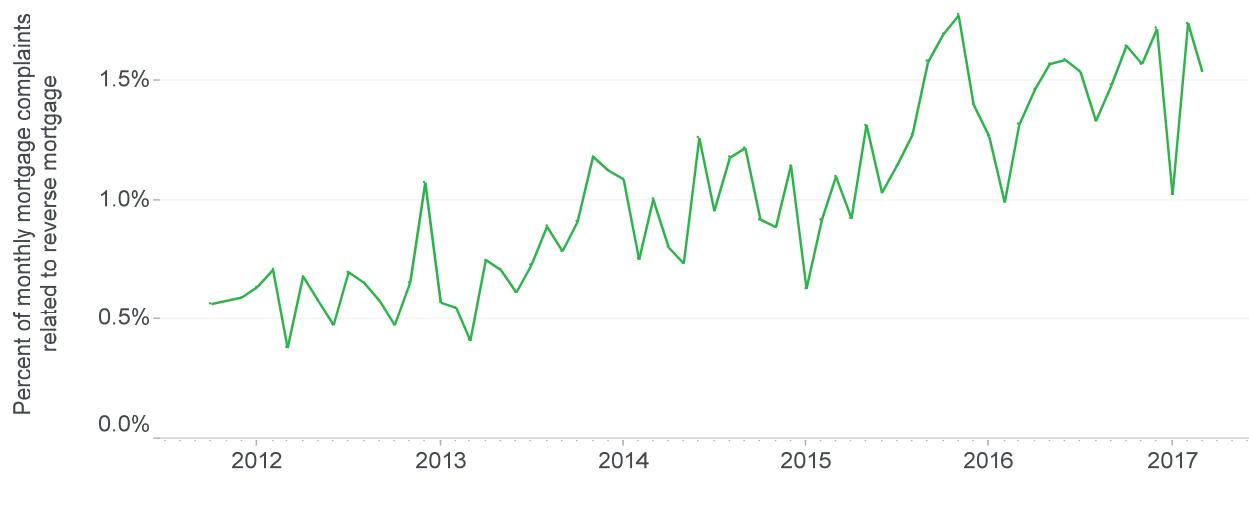
**FIGURE 6: TYPES OF BANK ACCOUNT OR SERVICE COMPLAINTS REPORTED BY OLDER CONSUMERS**



# 4. Reverse mortgage complaints

The CFPB began accepting reverse mortgage complaints in December 2011.<sup>7</sup> Reverse mortgages are a special type of loan that allows homeowners to borrow against the accrued equity in their homes. Most reverse mortgages today are called Home Equity Conversion Mortgages (HECMs), which are only available to homeowners 62 and older. HECMs are federally insured by the Federal Housing Administration (FHA). As of April 1, 2017, the CFPB has handled approximately 2,800 reverse mortgage complaints. Because the vast majority of reverse mortgages are linked to older consumers due to the age requirement of the HECM product, complaints submitted by all consumers are included in this section.<sup>8</sup>

**FIGURE 7: PERCENT OF MONTHLY MORTGAGE COMPLAINTS RELATED TO REVERSE MORTGAGES**

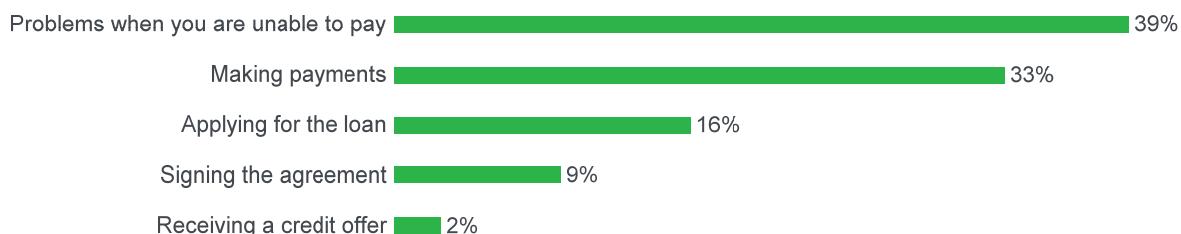


<sup>7</sup> When submitting mortgage complaints, consumers select the kind of mortgage they are complaining about: conventional home mortgage, FHA mortgage, VA mortgage, reverse mortgage, home equity loan or line of credit, and other type of mortgage.

<sup>8</sup> Unlike other sections of this report that focus on the 54% of complaints where consumers disclose their age, this section also includes complaints where the consumer did not disclose their age.

Figure 7 shows the types of reverse mortgage complaints consumers submitted as a percentage of all consumer reverse mortgage complaints handled since July 2011. The most common issues identified by consumers are problems when unable to pay (loan modification/collection/foreclosure) (39 percent), making payments (loan servicing/payments/escrow accounts) (33 percent), and applying for the loan (application/originator/mortgage broker) (16 percent).

**FIGURE 8: TYPES OF REVERSE MORTGAGE COMPLAINTS REPORTED BY CONSUMERS HANDLED FROM JULY 21, 2011 THROUGH MARCH 31, 2017**



**In 2017, older consumers with a reverse mortgage reported being at risk of foreclosure when they were unable to timely pay property taxes and homeowner's insurance.<sup>9</sup>** Some consumers stated they were delinquent in paying their taxes, insurance premiums, or both, and were extended repayment plans by their servicer to cure the delinquency. But some consumers continued to experience financial problems and were unable to meet the terms of the repayment. Most reverse mortgages require consumers to continue paying taxes and homeowner's insurance premiums; therefore, when consumers are unable to pay for taxes and insurance, their mortgage servicer might initiate foreclosure proceedings on their property. Some consumers also stated they were removed from the repayment agreement without notification or the notification they received did not provide an adequate explanation.

**Consumers also described their experiences with reverse mortgage servicers when trying to navigate the process to retain the property after the death of the**

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<sup>9</sup> Effective January 13, 2014, lenders of federally-insured HECMs, which represent the majority of reverse mortgages, are required to conduct a financial assessment of prospective borrowers, though loan qualification remains primarily equity-driven. See HUD Mortgagee Letter 2013-28 (Sept. 3, 2013) <http://portal.hud.gov/hudportal/documents/huddoc?id=13-28ml.pdf> (ML 2013-28). The financial assessment requirements were amended for loans originated after March 2, 2015. HUD Mortgagee Letter 2014-22 (Nov. 10, 2014), <http://portal.hud.gov/hudportal/documents/huddoc?id=14-22ml.pdf> (ML 2014-22).

**borrower.** Some non-borrowing spouses<sup>10</sup> complained that after submitting requests to remain in the property following the death of a borrower, servicers were slow to acknowledge their requests and occasionally required the same documentation to be submitted multiple times. Sometimes these delays resulted in foreclosures being initiated. Successors in interest<sup>11</sup> stated they were not given an opportunity to purchase the property or to market and sell the property after providing documentation of proof to act on behalf of the borrower's estate. Successors in interest also reported difficulties communicating with servicers and experienced delays in navigating the process, which sometimes resulted in the initiation of foreclosure proceedings.

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<sup>10</sup> Certain non-borrowing spouses may be eligible to stay in the home after the borrower's death if they meet criteria established by HUD. The HECM rules were also revised to make available a payment deferral period for some non-borrowing spouses following the borrowing spouse's death. See HUD Mortgagee Letter 2014-07 (April 25, 2014), <http://portal.hud.gov/hudportal/documents/huddoc?id=14-07ml.pdf> (ML 2014-07) and HUD Mortgagee Letter 2015-15 (June 12, 2015), <https://portal.hud.gov/hudportal/documents/huddoc?id=15-15ml.pdf> (ML 2015-15).

<sup>11</sup> The CFPB has stated that a successor in interest is the spouse, child, or heir of a deceased borrower or other party with an interest in the property. See CFPB Bulletin 2013-12 (Oct. 15, 2013), [http://files.consumerfinance.gov/f/201310\\_cfpb\\_mortgage-servicing\\_bulletin.pdf](http://files.consumerfinance.gov/f/201310_cfpb_mortgage-servicing_bulletin.pdf). The CFPB's amended mortgage servicing rules, which go into effect in April 2018, provide a new definition of successor in interest.

# 5.Issues raised by older consumers

Many of the issues that older consumers describe are similar to the issues raised by their younger counterparts. For example, like their younger counterparts, older consumers report concerns about how mortgage servicers apply payments to their outstanding balances (Figure 4). They also describe problems when attempting to dispute a charge with their credit card company (Figure 5). And they raise issues regarding their bank accounts such as difficulties making deposits and withdrawals, problems using ATM cards, and being charged service fees (Figure 6).

There are, however, some issues that essentially occur exclusively in the older consumer population (e.g., problems arising from a reverse mortgage). There are also issues where, although the underlying problem occurs in both older and younger populations, the consequences for older consumers are different or exacerbated because of their age (e.g., a retiree being able to respond to an unanticipated financial expense while on a fixed-income). The following observations focus on issues that are unique to or have unique effects for older consumers in 2017. These observations focus on three product categories where older consumers are more likely to submit complaints: mortgages, credit cards, and bank accounts and services.

**Older consumers reported escrow account issues when trying to take advantage of tax relief programs.** Like their younger counterparts, older consumers reported problems with property tax escrow accounts associated with their mortgages, including receiving notices from local tax authorities about unpaid property taxes despite having escrow accounts to collect funds for tax disbursements. Some tax authorities offer property tax relief programs that reduce tax obligations for consumers that fulfill certain income, age, ownership status, disability, or other assets requirements. But some older consumers complained that their escrow payments

and analysis statements did not accurately reflect the benefits of these programs. These consumers reported that they had provided verification documentation to their servicer to show a lower property tax rate; however, they experienced delays in receiving an escrow account payment adjustment.

**Older consumers described being confused by mortgage servicing transfers.** For some older consumers, particularly those who had the same mortgage servicer for years, they reported being confused when they received notice that the servicing of their loan was transferring to a new company. Some consumers described difficulties reconciling account balances or obtaining information related to their loan terms, including information related to their Home Equity Loan or Home Equity Line of Credit (HEL or HELOC). These older consumers sometimes stated their loan account balance was inconsistent with the balance prior to the servicing transfer, or that they received conflicting information when they inquired about their account history.

**Older consumers reported turning to credit cards when they experienced a large, unanticipated financial expense.** Some older consumers on fixed incomes reported that when they encountered large expenses, often medical, they turned to credit cards to cover the costs. When opening these credit accounts, older consumers reported not understanding the terms and conditions, such as the distinction between deferred interest and no interest. Months after charging these expenses, these consumers described being confused by the balances of their accounts.

**Older consumers described difficulties they experience when policies, products, or institutions change.** As financial institutions continue to innovate and increase access to consumer accounts through online and mobile technologies, some older consumers expressed reluctance to move away from more traditional banking methods. For example, some consumers raised concerns that checks or paper statements were no longer provided for free with their checking accounts. Other consumers raised concerns about accessing their financial information online. And some consumers, who banked with financial institutions for decades, expressed dissatisfaction when an acquiring bank implemented new policies and procedures. Older consumers sometimes requested that financial institutions make an exception and honor their accounts' original terms and conditions.

**Consumers reported difficulties using a Power of Attorney (POA) to manage an older consumer's bank account.** Representatives of older consumers reported a variety of

challenges using a POA at financial institutions. For example, some representatives reported having to provide a POA on multiple occasions because the company could not locate the authorization. Other representatives described companies not honoring a POA unless it was completed and notarized on company-specific forms. When the representative lived in a different state than the older consumer, the representative reported that completing a new POA was impractical.

**Older consumers complained about being billed for subscriptions they did not want or need.** Some older consumers reported dissatisfaction for being billed for recurring charges, such as monthly fees for credit monitoring. Some of these consumers stated that they were enrolled in the program without knowledge of the program and its costs. Some older consumers reported that they had paid on the unwanted service for months and only learned about the charges when a family member or other trusted third party reviewed their accounts.

**Older consumers reported difficulties recovering from financial scams.** Consumers, both young and old, reported concerns resulting from financial scams or having their identity stolen. Common consequences of scams and identity theft—as reported by older consumers—include having to correct credit reports, disputing charges with credit card companies, and attempting to have money recovered that was withdrawn from their bank accounts. In their complaints to the Bureau, older consumers often expressed confusion, and sometimes frustration, about what actions to take in remedying their individual situation. Family members of older consumers raised the additional concern about protecting older consumers in their family from scams and elder abuse—particularly when the older consumer suffers from a disease that affects their mental functioning, such as Alzheimer’s or dementia.

**Consumers reported difficulties navigating and organizing finances following the death of a spouse or family member.** Consumers must often take specific steps to take control of financial assets following the death of a spouse or family member—these steps are dependent on the unique circumstances of the individual and financial product. In their complaints to the Bureau, some consumers reported that despite having provided what they believed to be all the necessary documentation to obtain access to accounts, some companies did not respond to their requests to release assets, such as CDs or funds from bank accounts.

# APPENDIX A:

**TABLE 2: TOTAL COMPLAINTS BY MONTH AND PRODUCT**

	<b>Bank account or services</b>	<b>Consumer loan</b>	<b>Credit card</b>	<b>Credit reporting</b>	<b>Debt collection</b>	<b>Money transfer</b>	<b>Mortgage</b>	<b>Other financial services</b>	<b>Payday loan</b>	<b>Prepaid</b>	<b>Student loans</b>	<b>Total</b>
11-Jul	13	3	517	2	4	0	14	4	0	2	2	564
11-Aug	140	27	1,817	12	6	1	127	9	0	5	5	2,166
11-Sep	191	45	1,718	18	17	2	179	28	4	7	3	2,233
11-Oct	159	26	1,748	11	8	3	178	24	0	7	4	2,188
11-Nov	199	39	1,752	5	9	1	275	17	1	0	5	2,324
11-Dec	206	29	1,604	8	6	2	1,696	0	0	14	4	3,584
12-Jan	191	30	1,453	4	5	0	2,525	1	3	6	11	4,252
12-Feb	216	37	1,433	10	12	2	2,694	0	0	6	8	4,437
12-Mar	1,463	220	1,615	12	31	7	3,441	6	7	17	666	7,526
12-Apr	1,504	250	1,352	13	31	3	3,395	2	8	13	315	6,902
12-May	1,963	366	1,661	19	36	5	4,685	3	8	12	242	9,069
12-Jun	1,692	340	1,976	12	34	2	4,642	7	6	10	757	9,533
12-Jul	1,619	329	1,794	32	33	3	4,171	6	4	5	315	8,353
12-Aug	1,596	359	1,586	33	24	0	4,610	8	3	6	298	8,556
12-Sep	1,367	304	1,256	21	17	0	3,653	11	4	12	260	6,927
12-Oct	1,567	388	1,699	551	18	2	4,013	6	6	7	398	8,686
12-Nov	1,252	328	1,401	1,252	24	1	3,525	4	1	4	332	8,156
12-Dec	1,248	343	1,312	1,370	62	1	3,737	4	15	8	272	8,420
13-Jan	1,651	391	1,454	1,561	94	3	7,225	6	8	4	384	12,877
13-Feb	1,459	352	1,442	1,710	113	11	5,681	11	16	9	331	11,230
13-Mar	1,685	439	1,607	1,728	153	6	5,633	3	15	18	373	11,815
13-Apr	1,422	457	1,508	1,903	179	79	5,623	3	16	16	371	11,704
13-May	1,415	442	1,364	1,875	111	58	5,250	2	26	16	302	10,956
13-Jun	1,490	426	1,312	2,042	108	93	5,246	4	22	5	287	11,089
13-Jul	1,657	446	1,278	2,236	2,433	100	5,237	2	17	11	341	13,786
13-Aug	1,683	520	1,352	2,273	4,224	91	4,961	2	40	8	350	15,538
13-Sep	1,666	608	1,357	2,326	6,298	121	4,341	3	36	5	371	17,166
13-Oct	1,800	540	1,369	2,267	4,865	155	3,864	4	35	5	422	15,372
13-Nov	1,565	472	1,246	2,340	6,653	168	3,475	1	396	3	344	16,708
13-Dec	1,535	508	1,322	1,943	5,972	137	3,386	3	385	4	409	15,633

	Bank account or services	Consumer loan	Credit card	Credit reporting	Debt collection	Money transfer	Mortgage	Other financial services	Payday loan	Prepaid	Student loans	Total
14-Jan	1,829	580	1,549	3,221	8,137	162	4,240	0	441	8	491	20,694
14-Feb	1,808	581	1,615	3,509	7,795	144	4,545	2	374	3	494	20,889
14-Mar	2,047	663	1,668	3,556	8,422	171	4,898	3	413	6	584	22,459
14-Apr	1,987	688	1,665	3,850	8,313	171	4,757	8	402	1	541	22,411
14-May	1,950	591	1,497	3,394	7,374	175	4,099	2	324	5	537	19,983
14-Jun	1,943	696	1,497	3,463	7,753	184	4,134	4	347	5	584	20,626
14-Jul	2,026	872	1,571	3,816	7,993	157	4,411	62	587	94	582	22,276
14-Aug	1,564	1,002	1,689	4,647	7,223	148	4,340	104	645	138	626	22,320
14-Sep	1,593	979	1,548	4,379	6,381	164	4,114	110	587	151	594	20,806
14-Oct	1,625	1,026	1,437	3,561	6,685	132	4,474	124	532	139	654	20,583
14-Nov	1,391	910	1,357	3,569	6,131	123	3,506	102	478	129	546	18,396
14-Dec	1,463	982	1,459	3,698	6,070	160	3,587	92	468	144	548	18,862
15-Jan	1,617	998	1,515	4,149	6,547	144	3,513	107	458	165	575	19,941
15-Feb	1,457	990	1,788	4,032	6,874	141	3,601	112	472	183	603	20,403
15-Mar	1,725	1,092	1,896	4,815	8,000	195	4,287	158	538	199	719	23,797
15-Apr	1,748	941	1,757	4,733	7,179	190	4,238	146	484	192	686	22,488
15-May	1,704	1,029	1,825	4,493	7,149	208	4,266	156	414	177	645	22,266
15-Jun	1,968	1,095	1,890	4,297	7,471	211	4,664	166	460	195	626	23,250
15-Jul	1,997	1,344	1,961	6,547	8,184	235	4,464	203	478	187	645	26,424
15-Aug	2,042	1,340	1,931	5,591	7,545	218	4,949	197	445	179	656	25,299
15-Sep	1,907	1,253	1,947	4,679	6,666	198	4,566	148	450	179	612	22,817
15-Oct	2,247	1,292	1,964	4,432	6,810	229	4,435	160	508	892	568	23,795
15-Nov	1,984	1,092	1,819	3,731	6,291	192	3,951	191	421	260	457	20,612
15-Dec	1,974	1,041	1,883	3,419	6,342	190	3,794	162	382	223	467	20,137
16-Jan	2,110	1,174	2,001	3,367	6,681	222	4,192	183	422	227	567	21,366
16-Feb	1,834	1,251	1,997	3,705	7,248	198	4,455	171	394	206	618	22,333
16-Mar	2,036	1,349	2,052	4,861	8,030	187	4,947	207	436	241	1,134	25,740
16-Apr	1,880	1,263	1,995	4,507	7,234	195	4,315	188	383	177	1,190	23,553
16-May	2,192	1,286	1,983	4,807	6,845	198	4,273	126	395	226	963	23,607
16-Jun	2,541	1,274	1,979	4,907	6,943	197	4,289	199	370	221	1,001	24,187
16-Jul	2,379	1,310	2,147	5,207	6,471	164	3,907	137	335	208	1,167	23,653
16-Aug	2,652	1,491	2,598	4,987	9,642	228	4,288	261	422	244	1,246	28,356
16-Sep	3,086	1,528	2,690	4,591	7,298	208	4,463	173	329	187	1,322	26,121
16-Oct	2,834	1,597	2,637	5,222	7,703	189	4,318	176	336	180	1,237	26,711
16-Nov	2,424	1,375	2,221	4,043	6,688	181	3,953	161	336	181	1,040	22,901
16-Dec	2,414	1,466	2,283	3,719	7,144	174	3,732	145	258	202	844	22,575

	<b>Bank account or services</b>	<b>Consumer loan</b>	<b>Credit card</b>	<b>Credit reporting</b>	<b>Debt collection</b>	<b>Money transfer</b>	<b>Mortgage</b>	<b>Other financial services</b>	<b>Payday loan</b>	<b>Prepaid</b>	<b>Student loans</b>	<b>Total</b>
17-Jan	2,601	1,612	2,321	4,542	7,650	164	4,119	169	308	228	5,289	29,234
17-Feb	2,386	1,458	2,243	4,693	7,607	158	3,622	158	291	223	2,530	25,555
17-Mar	2,476	1,633	2,552	5,498	8,711	212	3,965	183	294	206	2,033	27,980
<b>Total<sup>12</sup></b>	<b>115,055</b>	<b>53,208</b>	<b>118,732</b>	<b>195,826</b>	<b>316,810</b>	<b>8,174</b>	<b>272,153</b>	<b>5,340</b>	<b>17,499</b>	<b>7,256</b>	<b>44,403</b>	<b>1,163,156</b>

<sup>12</sup> Total column includes approximately 8,700 complaints where no specific consumer financial product was selected by consumers.

**TABLE 3: TOTAL OLDER CONSUMER COMPLAINTS BY MONTH AND PRODUCT**

	Bank account or services	Consumer loan	Credit card	Credit reporting	Debt collection	Money transfer	Mortgage	Other financial services	Payday loan	Prepaid	Student loans	Total
11-Jul	6	1	90	1	0	0	0	2	0	0	0	101
11-Aug	7	0	232	0	1	0	1	0	0	2	0	245
11-Sep	5	0	200	1	0	0	4	0	1	1	0	212
11-Oct	3	1	188	0	2	0	0	1	0	0	0	195
11-Nov	4	0	161	0	0	0	4	0	0	0	0	170
11-Dec	6	1	159	0	0	0	190	0	0	2	0	358
12-Jan	10	2	232	0	0	0	265	0	0	0	0	509
12-Feb	4	2	150	0	1	0	173	0	0	0	0	331
12-Mar	127	21	196	0	2	2	214	0	2	0	15	579
12-Apr	103	30	168	0	4	1	181	0	0	0	8	496
12-May	127	22	166	0	3	0	174	0	0	0	7	501
12-Jun	112	18	224	1	4	0	189	1	0	0	10	560
12-Jul	121	30	228	4	5	0	253	0	0	1	9	654
12-Aug	139	18	179	3	0	0	266	0	0	0	7	612
12-Sep	103	15	132	1	0	0	228	0	0	0	7	488
12-Oct	124	25	168	37	2	0	269	0	1	0	12	639
12-Nov	92	28	136	66	2	0	228	0	0	0	7	562
12-Dec	104	22	147	58	2	0	201	0	0	0	8	542
13-Jan	158	33	161	102	6	0	382	0	0	0	12	858
13-Feb	112	23	152	127	2	3	333	0	1	0	6	761
13-Mar	191	41	171	106	4	1	388	0	2	4	13	950
13-Apr	168	36	161	174	8	14	468	0	0	1	13	1,055
13-May	141	48	140	127	5	6	414	1	1	2	11	903
13-Jun	170	33	127	116	2	12	450	0	3	0	8	925
13-Jul	210	51	158	140	269	13	452	1	0	1	9	1,306
13-Aug	172	48	190	125	473	16	485	0	1	0	11	1,521
13-Sep	211	49	177	136	548	16	373	1	1	0	13	1,527
13-Oct	223	46	196	157	393	25	367	0	0	0	8	1,419
13-Nov	162	32	152	173	634	24	319	0	25	0	6	1,528
13-Dec	128	32	111	153	560	14	240	0	33	0	7	1,280

	<b>Bank account or services</b>	<b>Consumer loan</b>	<b>Credit card</b>	<b>Credit reporting</b>	<b>Debt collection</b>	<b>Money transfer</b>	<b>Mortgage</b>	<b>Other financial services</b>	<b>Payday loan</b>	<b>Prepaid</b>	<b>Student loans</b>	<b>Total</b>
14-Jan	193	50	175	259	745	33	466	0	28	0	13	1,964
14-Feb	183	46	201	279	721	23	444	0	12	0	12	1,922
14-Mar	229	62	223	268	709	30	517	0	32	0	12	2,084
14-Apr	244	64	215	253	621	27	467	1	27	0	9	1,930
14-May	236	48	203	286	609	30	404	0	26	0	13	1,858
14-Jun	224	67	218	218	596	29	413	0	22	0	11	1,799
14-Jul	245	88	234	261	714	16	483	11	40	6	22	2,126
14-Aug	179	93	257	237	640	25	471	17	44	10	22	2,009
14-Sep	198	109	193	277	524	30	399	16	36	8	11	1,822
14-Oct	166	103	203	234	540	17	473	20	28	18	17	1,829
14-Nov	165	90	157	215	494	16	373	12	28	10	9	1,580
14-Dec	135	102	186	244	527	18	396	15	25	8	16	1,696
15-Jan	166	80	205	278	512	17	390	14	31	18	18	1,748
15-Feb	182	79	188	311	562	18	355	12	22	17	12	1,766
15-Mar	181	117	248	307	646	30	472	23	41	16	16	2,112
15-Apr	226	70	209	307	602	25	477	14	38	18	15	2,018
15-May	194	95	195	271	571	34	468	18	28	13	21	1,931
15-Jun	234	93	223	283	597	31	528	27	31	15	13	2,091
15-Jul	252	141	230	469	721	41	524	30	36	15	14	2,493
15-Aug	224	144	245	445	603	22	600	34	30	10	14	2,386
15-Sep	221	144	248	474	624	33	583	21	25	10	29	2,425
15-Oct	230	124	243	337	580	31	540	27	28	26	16	2,215
15-Nov	227	111	234	296	546	33	504	23	31	12	17	2,067
15-Dec	224	119	240	305	529	31	439	19	23	12	22	1,987
16-Jan	254	118	249	320	596	37	489	23	24	15	24	2,173
16-Feb	225	122	254	271	635	30	488	31	32	11	18	2,134
16-Mar	253	133	268	324	641	29	554	20	18	22	48	2,336
16-Apr	251	95	241	352	609	31	484	19	17	9	51	2,179
16-May	241	139	240	376	552	36	560	15	26	12	29	2,250
16-Jun	238	108	240	361	517	29	572	29	22	14	43	2,196
16-Jul	237	130	253	369	507	27	486	18	23	14	46	2,130
16-Aug	291	124	324	374	700	27	491	23	27	10	60	2,491
16-Sep	424	152	362	329	524	37	592	18	24	15	56	2,550
16-Oct	355	157	339	311	546	17	580	25	32	12	35	2,428
16-Nov	299	119	304	321	401	26	508	11	25	15	43	2,096
16-Dec	276	106	285	204	416	24	469	19	19	26	34	1,900

	<b>Bank account or services</b>	<b>Consumer loan</b>	<b>Credit card</b>	<b>Credit reporting</b>	<b>Debt collection</b>	<b>Money transfer</b>	<b>Mortgage</b>	<b>Other financial services</b>	<b>Payday loan</b>	<b>Prepaid</b>	<b>Student loans</b>	<b>Total</b>
17-Jan	292	132	259	340	500	19	512	18	20	18	130	2,258
17-Feb	275	141	293	298	456	22	484	18	18	20	76	2,117
17-Mar	268	130	294	326	496	28	486	16	23	22	60	2,169
<b>Total<sup>13</sup></b>	<b>12,380</b>	<b>4,853</b>	<b>14,430</b>	<b>13,798</b>	<b>25,561</b>	<b>1,206</b>	<b>26,452</b>	<b>664</b>	<b>1,133</b>	<b>491</b>	<b>1,334</b>	<b>103,052</b>

<sup>13</sup> Total column includes approximately 750 older consumer complaints where no specific consumer financial product was selected by consumers.

**TABLE 1: TOTAL COMPLAINTS BY LOCALITY AND PRODUCT**

	Bank account or services	Consumer loan	Credit card	Credit reporting	Debt collection	Money transfer	Mortgage	Other financial services	Payday loan	Prepaid	Student loans	Total
Alabama	1,145	884	969	2,470	4,236	71	2,128	75	354	98	522	13,070
Alaska	136	62	190	227	504	13	253	9	34	8	65	1,508
American Samoa	11	2	5	6	15	1	7	0	0	0	3	51
Arizona	2,438	1,330	2,631	3,852	7,502	154	6,232	85	262	150	850	25,696
Arkansas	507	305	504	1,073	1,638	40	944	31	76	33	250	5,440
California	15,411	6,396	15,742	24,826	40,038	1,136	46,412	636	1,845	1,032	4,739	159,158
Colorado	1,801	851	2,185	3,201	5,414	124	4,667	80	241	122	758	19,574
Connecticut	1,533	575	1,707	1,857	2,884	88	3,168	67	185	95	641	12,903
Delaware	694	331	722	861	1,627	27	1,268	34	105	27	159	5,889
District of Columbia	922	254	790	944	1,588	68	1,393	55	128	55	412	6,690
Federated States of Micronesia	6	2	14	10	16	1	15	1	2	0	1	68
Florida	10,189	4,354	10,251	22,574	28,457	631	29,346	388	1,236	458	2,918	111,559
Georgia	4,638	2,713	3,951	9,853	12,833	286	13,446	170	417	331	1,793	50,751
Guam	15	14	14	30	48	3	29	1	3	1	8	166
Hawaii	306	155	473	662	1,052	22	1,159	16	43	15	116	4,042
Idaho	290	181	444	714	1,493	28	804	8	70	12	172	4,241
Illinois	4,633	1,668	4,287	7,298	10,866	266	9,274	141	628	305	1,643	41,273
Indiana	1,233	736	1,271	2,158	4,348	93	2,484	77	356	89	861	13,794
Iowa	405	247	634	941	1,827	44	816	43	135	47	292	5,466
Kansas	610	315	699	917	2,198	43	1,008	26	116	46	274	6,309
Kentucky	744	472	785	1,577	3,185	65	1,589	43	216	58	438	9,229
Louisiana	1,003	726	901	2,495	4,434	86	2,316	63	350	89	443	12,982
Maine	354	172	578	425	959	16	931	25	60	36	205	3,782
Marshall Islands	5	8	8	4	14	0	11	1	0	0	2	53
Maryland	3,576	1,638	3,409	5,132	8,316	235	10,010	168	627	196	1,300	34,905
Massachusetts	2,887	780	2,953	2,675	4,317	202	5,416	112	305	151	1,177	21,101
Michigan	2,682	1,216	2,627	4,281	7,790	187	7,804	133	550	204	1,438	29,210
Minnesota	1,408	470	1,586	1,763	3,361	119	3,263	71	258	88	715	13,211
Mississippi	539	448	437	1,142	2,114	39	1,047	27	174	49	247	6,297
Missouri	1,352	932	1,407	2,459	5,033	105	3,405	80	312	117	841	16,133
Montana	134	85	242	308	791	11	351	10	39	12	96	2,093
Nebraska	392	176	457	465	1,412	24	661	21	94	29	220	3,974

	<b>Bank account or services</b>	<b>Consumer loan</b>	<b>Credit card</b>	<b>Credit reporting</b>	<b>Debt collection</b>	<b>Money transfer</b>	<b>Mortgage</b>	<b>Other financial services</b>	<b>Payday loan</b>	<b>Prepaid</b>	<b>Student loans</b>	<b>Total</b>
Nevada	1,389	726	1,296	2,585	4,159	93	3,413	54	260	101	348	14,559
New Hampshire	430	189	520	580	1,178	23	1,644	22	68	31	257	4,983
New Jersey	4,923	1,823	4,957	6,350	9,705	288	12,257	244	680	258	1,650	43,462
New Mexico	544	330	534	1,161	1,925	57	1,105	30	127	29	205	6,095
New York	9,414	2,610	10,445	12,586	16,083	626	17,207	419	483	476	3,235	74,072
North Carolina	3,085	1,829	3,237	5,630	8,322	194	7,803	158	489	183	1,145	32,335
North Dakota	89	55	118	240	442	9	148	8	16	8	45	1,184
Northern Mariana Islands	7	1	3	7	10	1	7	0	0	0	5	41
Ohio	3,420	1,869	3,982	4,904	10,611	207	7,282	151	707	261	1,874	35,511
Oklahoma	615	583	729	1,415	3,102	66	1,401	35	270	56	332	8,676
Oregon	1,367	499	1,459	1,776	3,844	70	3,274	70	185	96	611	13,368
Palau	1	1	2	3	1	0	6	0	0	0	0	14
Pennsylvania	4,870	1,849	4,514	6,306	10,851	272	8,897	224	663	257	2,307	41,264
Puerto Rico	364	158	386	733	546	15	503	19	6	9	70	2,855
Rhode Island	477	166	449	433	970	28	802	24	100	23	142	3,633
South Carolina	1,212	1,047	1,217	2,947	4,910	101	3,155	59	286	94	647	15,765
South Dakota	151	113	231	232	638	17	239	10	37	9	85	1,773
Tennessee	1,691	1,164	1,624	2,964	6,624	105	3,500	105	468	122	786	19,266
Texas	7,371	4,909	7,534	22,203	31,674	571	13,443	335	1,610	517	2,715	93,472
Utah	484	322	683	1,002	2,218	38	1,494	23	128	35	235	6,709
Vermont	220	92	275	249	387	11	428	9	23	17	117	1,837
Virgin Islands	37	10	39	78	55	5	53	2	4	1	6	293
Virginia	3,358	1,791	3,846	6,332	9,462	272	8,299	191	544	250	1,351	35,954
Washington	2,105	846	2,326	3,491	6,564	161	6,288	97	277	166	1,220	23,697
West Virginia	308	147	341	659	926	32	505	37	31	27	208	3,267
Wisconsin	1,246	606	1,709	1,597	4,006	93	2,833	57	292	126	615	13,285
Wyoming	73	67	124	202	435	7	218	10	34	3	57	1,245
U.S. Armed Forces – Americas	10	1	6	1	24	1	9	2	1	2	2	61
U.S. Armed Forces – Europe	47	26	39	73	105	6	98	4	0	2	34	435
U.S. Armed Forces – Pacific	21	21	43	50	93	3	57	0	2	0	15	305
Unspecified	3,727	860	3,191	1,837	6,630	574	4,128	244	487	144	485	23,122
<b>Total</b>	<b>115,055</b>	<b>53,208</b>	<b>118,732</b>	<b>195,826</b>	<b>316,810</b>	<b>8,174</b>	<b>272,153</b>	<b>5,340</b>	<b>17,499</b>	<b>7,256</b>	<b>44,403</b>	<b>1,163,156</b>

**TABLE 2: TOTAL OLDER CONSUMER COMPLAINTS BY LOCALITY AND PRODUCT**

	Bank account or services	Consumer loan	Credit card	Credit reporting	Debt collection	Money transfer	Mortgage	Other financial services	Payday loan	Prepaid	Student loans	Total
Alabama	113	56	125	154	312	17	206	6	14	4	21	1,037
Alaska	17	7	32	27	29	3	34	1	2	1	1	155
American Samoa	3	1	1	0	5	1	1	0	0	0	0	12
Arizona	285	131	360	377	733	22	701	18	13	11	43	2,710
Arkansas	48	28	85	91	177	9	114	5	3	3	5	571
California	1,665	610	1,725	2,030	3,516	167	4,663	93	149	72	169	14,933
Colorado	193	64	273	228	351	22	530	7	18	11	12	1,726
Connecticut	156	45	185	120	235	5	267	9	12	7	23	1,073
Delaware	91	30	85	51	154	5	124	3	11	2	10	570
District of Columbia	95	22	65	49	96	9	130	6	12	5	7	515
Federated States of Micronesia	1	1	5	5	1	0	1	1	0	0	0	15
Florida	1,261	531	1,634	1,727	2,840	102	3,224	56	89	45	93	11,673
Georgia	359	246	442	555	946	45	1,267	16	22	14	45	3,981
Guam	1	1	3	3	9	0	4	0	0	0	0	21
Hawaii	40	21	65	68	80	7	132	3	1	0	5	429
Idaho	28	19	70	47	122	9	104	4	6	1	11	425
Illinois	422	139	394	426	680	41	844	13	49	10	45	3,077
Indiana	101	54	135	156	291	17	258	6	17	2	23	1,073
Iowa	43	23	92	73	103	4	77	2	2	5	9	443
Kansas	53	27	113	74	167	5	107	1	12	4	10	582
Kentucky	72	42	117	92	234	13	156	6	7	8	7	759
Louisiana	111	48	128	210	324	10	246	7	17	5	7	1,116
Maine	56	20	85	28	79	6	96	4	7	8	6	397
Marshall Islands	2	1	0	1	0	0	2	0	0	0	0	6
Maryland	397	134	373	285	584	32	852	17	40	14	34	2,790
Massachusetts	378	73	396	191	371	25	578	18	20	8	40	2,104
Michigan	284	132	317	325	653	39	625	19	37	13	48	2,509
Minnesota	146	44	154	101	208	15	295	8	14	3	23	1,026
Mississippi	60	35	60	79	157	3	102	3	11	5	4	521
Missouri	136	85	204	210	398	16	380	13	27	5	20	1,500
Montana	16	5	45	20	58	5	30	3	5	2	1	192
Nebraska	41	14	46	50	97	1	68	5	5	3	8	341

	<b>Bank account or services</b>	<b>Consumer loan</b>	<b>Credit card</b>	<b>Credit reporting</b>	<b>Debt collection</b>	<b>Money transfer</b>	<b>Mortgage</b>	<b>Other financial services</b>	<b>Payday loan</b>	<b>Prepaid</b>	<b>Student loans</b>	<b>Total</b>
Nevada	188	69	194	260	424	17	394	9	34	8	13	1,624
New Hampshire	47	10	68	56	96	5	112	2	8	1	8	418
New Jersey	507	157	503	356	757	40	898	19	40	24	56	3,378
New Mexico	101	34	106	113	217	12	167	6	11	6	11	789
New York	996	229	1,205	746	1,273	80	1,311	60	25	30	92	6,098
North Carolina	322	161	439	469	660	27	801	18	15	15	25	2,974
North Dakota	6	4	11	1	27	2	3	1	0	1	1	59
Northern Mariana Islands	0	0	1	0	1	0	1	0	0	0	0	3
Ohio	418	214	523	421	813	42	834	19	54	24	68	3,464
Oklahoma	83	42	115	135	252	14	171	4	9	3	10	844
Oregon	179	62	222	185	382	14	363	5	15	9	10	1,457
Palau	0	0	0	0	0	0	0	0	0	0	0	0
Pennsylvania	559	192	511	410	899	45	878	33	44	15	72	3,675
Puerto Rico	28	15	36	66	58	2	54	2	1	1	4	269
Rhode Island	50	18	69	50	105	2	63	3	11	0	6	381
South Carolina	134	70	169	240	429	9	326	3	12	8	21	1,436
South Dakota	17	14	22	31	32	0	24	0	2	1	4	148
Tennessee	174	110	190	253	487	10	382	4	25	10	23	1,679
Texas	629	377	806	1,088	2,114	81	1,347	42	102	24	78	6,731
Utah	47	15	76	61	140	4	122	2	6	1	2	483
Vermont	27	13	52	21	27	3	48	0	2	0	4	197
Virgin Islands	3	3	9	2	5	0	8	0	0	0	0	30
Virginia	335	127	408	365	705	33	709	20	26	11	23	2,788
Washington	239	79	281	272	461	24	601	13	12	10	38	2,049
West Virginia	40	17	61	109	121	12	54	3	2	2	7	433
Wisconsin	139	57	199	120	274	11	270	9	16	9	14	1,130
Wyoming	14	6	24	15	24	0	27	0	1	0	1	113
U.S. Armed Forces – Americas	2	1	2	0	2	0	2	1	0	0	0	11
U.S. Armed Forces – Europe	2	0	0	1	1	0	1	0	0	0	0	5
U.S. Armed Forces – Pacific	3	2	1	3	3	1	0	0	0	0	1	14
Unspecified	417	66	313	96	762	61	263	33	38	7	12	2,090
<b>Total</b>	<b>12,380</b>	<b>4,853</b>	<b>14,430</b>	<b>13,798</b>	<b>25,561</b>	<b>1,206</b>	<b>26,452</b>	<b>664</b>	<b>1,133</b>	<b>491</b>	<b>1,334</b>	<b>103,052</b>

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