

**UNITED STATES OF AMERICA  
CONSUMER FINANCIAL PROTECTION BUREAU**

**ADMINISTRATIVE PROCEEDING**

File No. 2017-CFPB-0011

In the Matter of:

**Nationstar Mortgage LLC**

**CONSENT ORDER**

The Consumer Financial Protection Bureau (Bureau) has reviewed the data collection and reporting practices of Nationstar Mortgage LLC (Respondent, as defined below) and has identified the following law violations: Respondent's mortgage loan data submissions for 2012, 2013, and 2014 contained substantial errors in violation of the Home Mortgage Disclosure Act (HMDA), 12 U.S.C. §§ 2801–2810, and its implementing regulation, Regulation C, 12 C.F.R. pt. 1003.<sup>1</sup> Under Sections 1053 and 1055 of the Consumer Financial Protection Act of 2010 (CFPA), 12 U.S.C. §§ 5563, 5565, the Bureau issues this Consent Order (Consent Order).

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<sup>1</sup> All references to Regulation C are to the version in effect during the Relevant Period.

**I**  
**Jurisdiction**

1. The Bureau has jurisdiction over this matter under sections 1053 and 1055 of the CFPA, 12 U.S.C. §§ 5563 and 5565, and section 2804 of the Home Mortgage Disclosure Act, 12 U.S.C. §§ 2804(b) and (d).

**II**  
**Stipulation**

2. Respondent has executed a “Stipulation and Consent to the Issuance of a Consent Order,” dated March 8, 2017 (Stipulation), which is incorporated by reference and is accepted by the Bureau. By this Stipulation, Respondent has consented to the issuance of this Consent Order by the Bureau under sections 1053 and 1055 of the CFPA, 12 U.S.C. §§ 5563 and 5565, without admitting or denying any of the findings of fact or conclusions of law, except that Respondent admits the facts necessary to establish the Bureau’s jurisdiction over Respondent and the subject matter of this action.

**III**  
**Definitions**

3. The following definitions apply to this Consent Order:
  - a. “Board” means Respondent’s duly elected and acting Board of Directors.
  - b. “Effective Date” means the date on which the Consent Order is issued.
  - c. “HMDA Data” are mortgage loan data submitted in accordance with HMDA, 12 U.S.C. § 2803, and Regulation C, 12 C.F.R. § 1003.5.
  - d. “Covered Loans” are applications for, originations of, and purchases of home purchase loans, home improvement loans, and refinancings that Respondent

is required to report on a HMDA Loan/Application Register for each calendar year under HMDA and Regulation C.

- e. “HMDA Loan/Application Register” or “HMDA LAR” is the compilation of information about each applicant or borrower, reported on a loan-by-loan, application-by-application basis in accordance with HMDA and Regulation C.
- f. “Regional Director” means the Regional Director for the Southeast Region for the Office of Supervision for the Consumer Financial Protection Bureau, or his/her delegate.
- g. “Related Consumer Action” means a private action by or on behalf of one or more consumers or an enforcement action by another governmental agency brought against Respondent based on substantially the same facts as described in Section IV of this Consent Order.
- h. “Relevant Period” includes the period from January 1, 2012, to December 31, 2014.
- i. “Respondent” means Nationstar Mortgage LLC, and its successors and assigns.

#### IV **Bureau Findings and Conclusions**

The Bureau finds the following:

- 4. Respondent is a for-profit mortgage lender that is an indirectly held, wholly-owned subsidiary of Nationstar Mortgage Holdings, Inc. Respondent’s principal place of business is Coppell, located in Dallas County, Texas.

5. Based on its 2014 HMDA Data, Respondent was the ninth-largest HMDA reporter by total originations, the sixth-largest by applications received, and the thirteenth-largest by funded loan amount. As of September, 2015, Respondent had \$9.6 billion in total assets.
6. Respondent originated more than \$3 billion annually in home purchase loans, including refinancings of home purchase loans, in 2011, 2012, and 2013 (the years preceding each calendar year of the Relevant Period). *See 12 C.F.R. § 1003.2* (definition of “financial institution,” (2)(i)(B)).
7. On December 31 in 2011, 2012, and 2013, Respondent had a branch office in a Metropolitan Statistical Area (MSA) for HMDA reporting purposes, *see id. § 1003.2* (definition of “financial institution,” (2)(ii)); in 2011, 2012, and 2013, Respondent received applications for, originated, or purchased more than five Covered Loans related to property in an MSA, *see id. § 1003.2* (definition of “branch office,” (2)).
8. Including refinancings of home purchase loans, Respondent originated more than 16,000 home purchase loans in 2011, more than 32,000 home purchase loans in 2012, and more than 98,000 home purchase loans in 2013. *See id. § 1003.2* (definition of “financial institution,” (2)(iii)(B)).
9. During the Relevant Period, Respondent “engaged for profit in the business of mortgage lending,” 12 U.S.C. § 2802(5), and was a “financial institution” within the meaning of Regulation C, 12 C.F.R. § 1003.2 (definition of “financial institution”). Therefore, Respondent was required to collect and report data on Covered Loans in compliance with HMDA and Regulation C. *See 12 U.S.C. § 2803; 12 C.F.R. § 1003.4.*

10. In recent years, Respondent has experienced a rapid and substantial increase in its number of Covered Loans, a reporting category that includes applications, originations, and purchases. Respondent reported 60,275 Covered Loans on its 2012 HMDA LAR, 269,169 Covered Loans on its 2013 HMDA LAR, and 252,261 Covered Loans on its 2014 HMDA LAR. Overall, from 2010 to 2014, Respondent's number of Covered Loans increased by nearly nine-hundred percent.
11. As part of its increase in Covered Loans, Respondent increased its originations by over seven-hundred percent between 2010 and 2013. Respondent originated more than 32,000 Covered Loans totaling approximately \$7 billion in 2012, originated more than 98,000 Covered Loans totaling approximately \$20 billion in 2013, and originated more than 61,000 Covered Loans totaling approximately \$11 billion in 2014.
12. Respondent has a history of HMDA non-compliance. Notably, the Massachusetts Division of Banks conducted an examination of Respondent in 2010 and, in November 2011, entered into a consent order with Respondent to address, among other issues, compliance with HMDA and Regulation C. The consent order required Respondent to "enhance, establish, implement, and maintain procedures to ensure compliance with the loan reporting requirements" of HMDA and Regulation C, including implementing internal controls to ensure accurate HMDA reporting.<sup>2</sup> It further required Respondent to maintain "operating policies and training procedures to ensure that all

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<sup>2</sup> *In re Nationstar Mortgage LLC*, No. 2011-010 (Mass. Comm'n of Banks, November 30, 2011), available at <http://www.mass.gov/ocabr/banking-and-finance/laws-and-regulations/enforcement-actions/2011-dob-enforcement-actions/nationstar-consentorder-11302011.html>.

applicable personnel possess a comprehensive understanding of the reporting requirements of Regulation C.”<sup>3</sup> The Massachusetts Division of Banks also assessed a \$25,000 administrative penalty against Respondent. The Massachusetts Division of Banks released Respondent from the consent order on December 24, 2013.

- 13. In April 2015, the Bureau undertook a HMDA Data Integrity Review of Respondent’s 2012, 2013, and 2014 HMDA LAR for compliance with HMDA and Regulation C. Following the examination, the Bureau conducted an investigation of Respondent’s HMDA compliance, including further review of Respondent’s 2012, 2013, and 2014 HMDA LARs.
- 14. With respect to Respondent’s 2012 HMDA LAR, the Bureau found a sample error rate of 13 percent. This exceeds the Bureau’s applicable resubmission threshold of 10 percent.<sup>4</sup>
- 15. With respect to Respondent’s 2013 HMDA LAR, the Bureau found a sample error rate of 33 percent. This exceeds the Bureau’s applicable resubmission threshold of 10 percent.<sup>5</sup>
- 16. With respect to Respondent’s 2014 HMDA LAR, the Bureau found a sample error rate of 21 percent. This exceeds the applicable resubmission threshold of 4 percent.<sup>6</sup>

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<sup>3</sup> *Id.*

<sup>4</sup> Federal Reserve Board, HMDA Resubmission Standards, available at <http://www.federalreserve.gov/boarddocs/caletters/2004/0404/CA04-4Attach3.pdf> (setting forth the threshold at which Federal Reserve examiners should require correction and resubmission of data reported pursuant to HMDA and Regulation C). The Bureau used these standards prior to the Bureau’s own guidelines taking effect in 2014.

<sup>5</sup> *Id.*

17. These sample error rates indicate the presence of large numbers of errors in the HMDA LAR that exceed the Bureau’s applicable resubmission thresholds.
18. At the time of the Bureau’s examination, the measures that Respondent had taken to comply with Regulation C were deficient. Specifically, Respondent’s compliance mechanisms included the following inadequacies: (a) not maintaining detailed and centralized HMDA data collection and validation procedures; (b) not clearly and consistently defining, with specificity, employee roles and responsibilities for HMDA data collection and reporting; (c) not performing formal compliance tests, audits, or transaction tests of HMDA data during the Relevant Period; (d) allowing inconsistent data definitions among different lines of business, resulting in data inconsistencies; (e) inadequate ongoing monitoring of vendors related to HMDA; and (f) not implementing adequate compliance management measures to detect and prevent these deficiencies. Nationstar subsequently engaged two independent consultants to evaluate its overall compliance management system, including HMDA compliance, for deficiencies, to assist in addressing these deficiencies, and to assist in improving Nationstar’s HMDA Data quality.
19. During the Relevant Period, Respondent’s HMDA compliance management system did not maintain procedures “reasonably adapted to avoid such errors,” 12 C.F.R. § 1003.6(b), in its HMDA LAR.

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<sup>6</sup> CFPB Examination Procedures, HMDA Resubmission Schedule and Guidelines, *available at* [http://files.consumerfinance.gov/f/201310\\_cfpb\\_hmda\\_resubmission-guidelines\\_fair-lending.pdf](http://files.consumerfinance.gov/f/201310_cfpb_hmda_resubmission-guidelines_fair-lending.pdf); see CFPB, Supervisory Highlights 18-19 (Fall 2014), *available at* [http://files.consumerfinance.gov/f/201410\\_cfpb\\_supervisory-highlights\\_fall-2014.pdf](http://files.consumerfinance.gov/f/201410_cfpb_supervisory-highlights_fall-2014.pdf).

20. Respondent's HMDA reporting errors are not bona fide errors within the meaning of Regulation C. *See* 12 C.F.R. § 1003.6(b).
21. Therefore, Respondent's HMDA Data submissions for calendar years 2012, 2013, and 2014 contained errors, in violation of HMDA, 12 U.S.C. § 2803, and Regulation C, 12 C.F.R. § 1003.4.

**ORDER**

V

**Conduct Provisions**

**IT IS ORDERED**, under sections 1053 and 1055 of the CFPB, that:

22. Respondent and its officers, agents, servants, employees, and attorneys who have actual notice of this Consent Order, whether acting directly or indirectly, may not violate HMDA, 12 U.S.C. §§ 2801–2810, and Regulation C, 12 C.F.R. pt. 1003.
23. Within 60 days from the Effective Date, Respondent shall submit to the Regional Director written evidence confirming that Respondent has reviewed, corrected as directed by the Bureau, and made available its 2012, 2013, and 2014 HMDA Data in accordance with Regulation C.

VI

**Compliance Plan**

**IT IS FURTHER ORDERED that:**

24. Within 60 days of the Effective Date, Respondent must submit to the Regional Director for review and determination of non-objection a comprehensive compliance plan designed to ensure that Respondent's collection, recording,

and reporting of HMDA Data and HMDA policies, procedures, and compliance management system comply with all applicable Federal consumer financial laws and the terms of this Consent Order (Compliance Plan). The Compliance Plan must include, at a minimum:

- a. Detailed steps for addressing each action required by this Consent Order;
- b. Detailed steps to develop, implement, and maintain any necessary improvements to Respondent's policies, procedures, and internal controls to ensure compliance with the data collection and reporting requirements set forth in HMDA and Regulation C, as well as any pending revisions to HMDA and Regulation C, including quarterly reviews of HMDA reporting requirements as outlined in 12 C.F.R. pt. 1003;
- c. Detailed steps to develop, implement, and maintain any necessary improvements to Respondent's program to regularly test HMDA Data integrity and institute prompt corrective action to address errors;
- d. Detailed steps to develop, implement, and maintain any necessary improvements to Respondent's operating policies and training procedures, provided when employees join Respondent and repeated at recurring intervals, to ensure that personnel have a current and complete understanding of HMDA standards and reporting requirements, including that all relevant personnel understand any job-specific obligations to ensure accurate HMDA reporting;
- e. Detailed steps to develop, implement, and maintain a compliance audit program (Compliance Audit Program) that is led by an internal audit department that is independent of Respondent's compliance and business

units, can adequately audit Respondent's compliance with HMDA and Regulation C, and is adequately staffed with qualified personnel. The Compliance Audit Program shall assess, at least annually, Respondent's HMDA and Regulation C compliance, including its adherence to the Compliance Plan and whether any changes or additions are necessary to ensure compliance with the requirements of this Consent Order, and within 10 days of completing each assessment, the Compliance Audit Program shall provide its written findings to the Board and the Regional Director; and

- f. Specific timeframes and deadlines for implementation of the steps described above that have not already been completed and a section designating and certifying those items that have been completed.
25. The Compliance Plan shall also include:
- a. Respondent's Compliance Audit Program's review and assessment of the Compliance Plan (Compliance Audit Report), including but not limited to whether Respondent's Compliance Plan satisfies the requirements in this Consent Order as set forth in paragraph 24 and whether any changes or additions to Respondent's Compliance Plan are necessary to ensure compliance with the requirements of this Consent Order; and
  - b. Detailed steps to be taken to correct any deficiencies identified in the Compliance Audit Report.
26. The Regional Director will have the discretion to make a determination of non-objection to the Compliance Plan or direct Respondent to revise it. If the Regional Director directs Respondent to revise the Compliance Plan, Respondent must make the requested revisions and resubmit the revised

Compliance Plan to the Regional Director within 15 days of the date that the Regional Director directs Respondent to revise the Compliance Plan.

27. After receiving notification that the Regional Director has made a determination of non-objection to the Compliance Plan, Respondent must implement and adhere to the steps, recommendations, deadlines, and timeframes outlined in the Compliance Plan and have the Compliance Audit Program review and assess compliance with the Compliance Plan and validate that the Compliance Plan has been properly executed; the results of such review should be submitted to the Regional Director within 30 days after completion.

## VII **Role of the Board**

**IT IS FURTHER ORDERED** that:

28. The Board or a subcommittee thereof must review all submissions (including plans, reports, programs, policies, and procedures) required by this Consent Order prior to submission to the Bureau.
29. Although this Consent Order requires Respondent to submit certain documents for review and non-objection by the Regional Director, the Board will have the ultimate responsibility for proper and sound oversight of Respondent and for ensuring that Respondent complies with Federal consumer financial law and this Consent Order.
30. In each instance that this Consent Order requires the Board to ensure adherence to, or perform certain obligations of Respondent, the Board or a subcommittee thereof must:

- a. Authorize whatever actions are necessary for Respondent to fully comply with the Consent Order;
- b. Require timely reporting by management to the Board on the status of compliance obligations; and
- c. Require timely and appropriate corrective action to remedy any material non-compliance with any failures to comply with Board directives related to this Section.

## VIII **Order to Pay Civil Money Penalties**

**IT IS FURTHER ORDERED** that:

- 31. Under section 1055(c) of the CFPA, 12 U.S.C. § 5565(c), by reason of the violations of law and regulation described in Section IV of this Consent Order, and taking into account the factors in 12 U.S.C. § 5565(c)(3), Respondent must pay a civil money penalty of \$1.75 million to the Bureau.
- 32. Within 10 days of the Effective Date, Respondent must pay the civil money penalty by wire transfer to the Bureau or to the Bureau's agent in compliance with the Bureau's wiring instructions.
- 33. The civil money penalty paid under this Consent Order will be deposited in the Civil Penalty Fund of the Bureau as required by section 1017(d) of the CFPA, 12 U.S.C. § 5497(d).
- 34. Respondent must treat the civil money penalty paid under this Consent Order as a penalty paid to the government for all purposes. Regardless of how the Bureau ultimately uses those funds, Respondent may not:

- a. Claim, assert, or apply for a tax deduction, tax credit, or any other tax benefit for any civil money penalty paid under this Consent Order or any Penalty Offset payment made pursuant to paragraph 35; or
  - b. Seek or accept, directly or indirectly, reimbursement or indemnification from any source, including but not limited to payment made under any insurance policy, with regard to any civil money penalty paid under this Consent Order or any Penalty Offset payment made pursuant to paragraph 35.
35. To preserve the deterrent effect of the civil money penalty in any Related Consumer Action, Respondent may not argue that Respondent is entitled to, nor may Respondent benefit by, any offset or reduction of any compensatory or monetary remedies imposed in the Related Consumer Action because of the civil money penalty paid in this action (Penalty Offset). If the court in any Related Consumer Action grants such a Penalty Offset, Respondent must, within 30 days after entry of a final order granting the Penalty Offset, notify the Bureau, and pay the amount of the Penalty Offset to the U.S. Treasury. Such a payment will not be considered an additional civil money penalty and will not change the amount of the civil money penalty imposed in this action.
36. In the event of any default on Respondent's obligations to make payment under this Consent Order, interest, computed under 28 U.S.C. § 1961, as amended, will accrue on any outstanding amounts not paid from the date of default to the date of payment, and will immediately become due and payable.
37. Respondent must relinquish all dominion, control, and title to the funds paid to the fullest extent permitted by law and no part of the funds may be returned to Respondent.

38. Under 31 U.S.C. § 7701, Respondent, unless it already has done so, must furnish to the Bureau its taxpayer identifying numbers, which may be used for purposes of collecting and reporting on any delinquent amount arising out of this Consent Order.
39. Within 30 days of the entry of a final judgment, consent order, or settlement in a Related Consumer Action, Respondent must notify the Regional Director of the final judgment, consent order, or settlement in writing. That notification must indicate the amount of redress, if any, that Respondent paid or is required to pay to consumers and describe the consumers or classes of consumers to whom that redress has been or will be paid.

## IX Reporting Requirements

**IT IS FURTHER ORDERED** that:

40. Respondent must notify the Bureau of any development that may affect compliance obligations arising under this Consent Order, including but not limited to, a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor company; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this Consent Order; the filing of any bankruptcy or insolvency proceeding by or against Respondent; or a change in Respondent's name or address. Respondent must provide this notice, if practicable, at least 30 days before the development, but in any case no later than 14 days after the development.

41. Within 7 days of the Effective Date, Respondent must designate at least one telephone number and email, physical, and postal address as points of contact, which the Bureau may use to communicate with Respondent.
42. Respondent must report any change in the information required to be submitted under Paragraph 41 at least 30 days before the change or as soon as practicable after the learning about the change, whichever is sooner.
43. Within 90 days of the Effective Date, and again at least semi-annually, Respondent must submit to the Regional Director an accurate written compliance progress report (Compliance Report) that has been approved by the Board, which, at a minimum:
  - a. Describes in detail the manner and form in which Respondent has complied with this Order;
  - b. Separately lists each corrective action required by this Consent Order, the Compliance Plan, the Compliance Audit Report, and the Compliance Audit Program;
  - c. Describes the current status of each corrective action taken and the required, actual, and anticipated completion date for each corrective action; and
  - d. Attaches a copy of each Order Acknowledgment obtained under Section X, unless previously submitted to the Bureau.

**X**

**Order Distribution and Acknowledgment**

**IT IS FURTHER ORDERED** that,

44. Within 45 days of the Effective Date, Respondent must deliver a copy of this Consent Order to each of its Board members and executive officers, as well as

to any managers, employees, service providers, or other agents and representatives who have responsibilities related to the subject matter of the Consent Order.

45. For the duration of the Consent Order, Respondent must deliver a copy of this Consent Order to any business entity resulting from any change in structure referred to in Section IX and to any future Board members and executive officers, as well as to any managers, employees, service providers, or other agents and representatives who will have responsibilities related to the subject matter of the Consent Order, before they assume their responsibilities.
46. Respondent must secure a signed and dated statement acknowledging receipt of a copy of this Consent Order, ensuring that any electronic signatures comply with the requirements of the E-Sign Act, 15 U.S.C. § 7001 *et seq.*, within 30 days of delivery, from all persons receiving a copy of this Consent Order under this Section.

## XI **Recordkeeping**

### **IT IS FURTHER ORDERED** that:

47. Respondent must create, or if already created, must retain for the duration of the Consent Order, all documents and records necessary to demonstrate full compliance with each provision of this Consent Order, including all submissions to the Bureau.
48. Respondent must retain the documents identified in Paragraph 47 for the duration of the Consent Order.
49. Respondent must make the documents identified in Paragraph 47 available to

the Bureau upon the Bureau's request.

**XII**  
**Notices**

**IT IS FURTHER ORDERED** that:

50. Unless otherwise directed in writing by the Bureau, Respondent must provide all submissions, requests, communications, or other documents relating to this Consent Order in writing, with the subject line, "*In re Nationstar Mortgage*, File No. 2017-CFPB-0011," and send them either:
  - a. By overnight courier (not the U.S. Postal Service), as follows:

Regional Director, Bureau Southeast Region  
1625 Eye Street, N.W.  
Washington D.C. 20006; or
  - b. By first-class mail to the below address and contemporaneously by email to [james.carley@cfpb.gov](mailto:james.carley@cfpb.gov) and [cfpb\\_seranalysts@cfpb.gov](mailto:cfpb_seranalysts@cfpb.gov):

Regional Director, Bureau Southeast Region  
1700 G Street, N.W.  
Washington D.C. 20552

**XIII**  
**Compliance Monitoring**

**IT IS FURTHER ORDERED** that, to monitor Respondent's compliance with this Consent Order:

51. Within 21 days of receipt of a written request from the Bureau, Respondent must submit additional Compliance Reports or other requested information, which must be made under penalty of perjury; provide sworn testimony; or produce documents.

52. Respondent must permit Bureau representatives to interview any employee or other person affiliated with Respondent who has agreed to such an interview. The person interviewed may have counsel present.
53. Nothing in this Consent Order will limit the Bureau's lawful use of civil investigative demands under 12 C.F.R. § 1080.6 or other compulsory process.

#### XIV

#### **Modifications to Non-Material Requirements**

**IT IS FURTHER ORDERED** that:

54. Respondent may seek a modification to non-material requirements of this Consent Order (*e.g.*, reasonable extensions of time and changes to reporting requirements) by submitting a written request to the Regional Director.
55. The Regional Director may, in his or her discretion, modify any non-material requirements of this Consent Order (*e.g.*, reasonable extensions of time and changes to reporting requirements) if he or she determines good cause justifies the modification. Any such modification by the Regional Director must be in writing.

#### XV

#### **Administrative Provisions**

56. The provisions of this Consent Order do not bar, estop, or otherwise prevent the Bureau, or any other governmental agency, from taking any other action against Respondent, except as described in Paragraph 57.
57. The Bureau releases and discharges Respondent from all potential liability for law violations that the Bureau has or might have asserted based on the

practices described in Section IV of this Consent Order, to the extent such practices occurred before the Effective Date and the Bureau knows about them as of the Effective Date. The Bureau may use the practices described in this Consent Order in future enforcement actions against Respondent and its affiliates, including, without limitation, to establish a pattern or practice of violations or the continuation of a pattern or practice of violations or to calculate the amount of any penalty. This release does not preclude or affect any right of the Bureau to determine and ensure compliance with the Consent Order, or to seek penalties for any violations of the Consent Order.

58. This Consent Order is intended to be, and will be construed as, a final Consent Order issued under section 1053 of the CFPA, 12 U.S.C. § 5563, and expressly does not form, and may not be construed to form, a contract binding the Bureau or the United States.
59. This Consent Order will terminate 5 years from the Effective Date or 5 years from the most recent date that the Bureau initiates an action alleging any violation of the Consent Order by Respondent. If such action is dismissed or the relevant adjudicative body rules that Respondent did not violate any provision of the Consent Order, and the dismissal or ruling is either not appealed or upheld on appeal, then the Consent Order will terminate as though the action had never been filed. The Consent Order will remain effective and enforceable until such time, except to the extent that any provisions of this Consent Order have been amended, suspended, waived, or terminated in writing by the Bureau or its designated agent.

60. Calculation of time limitations will run from the Effective Date and be based on calendar days, unless otherwise noted.
61. Should Respondent seek to transfer or assign all or part of its operations that are subject to this Consent Order, Respondent must, as a condition of sale, obtain the written agreement of the transferee or assignee to comply with all applicable provisions of this Consent Order.
62. The provisions of this Consent Order will be enforceable by the Bureau. For any violation of this Consent Order, the Bureau may impose the maximum amount of civil money penalties allowed under section 1055(c) of the CFPA, 12 U.S.C. § 5565(c). In connection with any attempt by the Bureau to enforce this Consent Order in federal district court, the Bureau may serve Respondent wherever Respondent may be found and Respondent may not contest that court's personal jurisdiction over Respondent.
63. This Consent Order and the accompanying Stipulation contain the complete agreement between the parties. The parties have made no promises, representations, or warranties other than what is contained in this Consent Order and the accompanying Stipulation. This Consent Order and the accompanying Stipulation supersede any prior oral or written communications, discussions, or understandings.
64. Nothing in this Consent Order or the accompanying Stipulation may be construed as allowing Respondent, its Board, officers, or employees to violate any law, rule, or regulation.

**IT IS SO ORDERED**, this 14th day of March, 2017.

  
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Richard Cordray  
Director  
Consumer Financial Protection Bureau