

CFPA Legislation

CFPA

Belief that:

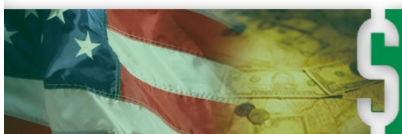
Failure to protect consumers lead to crisis

Lenders profited by “tricks and traps”

**Current Federal agencies’ protection programs are
flawed**

CFPA will provide better consumer protections





CFPA Legislation

Concerns:

CFPA powers would be extremely broad, undefined, unlimited

Would impact all financial products

Could impose very arbitrary requirements

Fees, rates

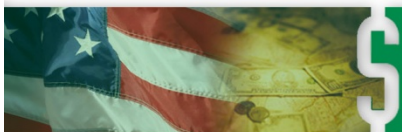
Could arbitrarily conclude what is “reasonable”

Would create new federal bureaucracy

Single Director would make all decisions

Unintended and Unknown consequences





CFPA Legislation

CFPA

U.S. House of Representatives

Within Overall Financial Regulatory Reform:

H.R. 3126, the “Consumer Financial Protection Agency Act of 2009”

Introduced Sept. 24, 2009, by Chairman Barney Frank (D-MA)

Will become Title X in omnibus financial reform bill

Mark-up in Committee started Oct. 15th





CFPA - Check Cashing Exemption

FiSCA Urged Check Cashing Exemption from CFPA

Check cashing not involved in financial meltdown

No federal bailout money received

Fee for Service transaction – not a “financial product”

No account relationship required





CFPA - Check Cashing Exemption

FiSCA Urged Check Cashing Exemption from CFPA (Cont'd)

Already regulated with strong consumer protections

High consumer satisfaction and respect

Smaller independent banks exempt

Smaller credit unions exempt

