



Consumer Financial
Protection Bureau

*Sensitive and Pre-Decisional
Contains Confidential Supervisory Information*

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RE Recommendations for Auto Lending Global Efforts

DATE June 29, 2015

Below is a list of [REDACTED] auto lenders [REDACTED] over the period February 2014 through March 2015 according to Experian Auto Count. The lenders are listed [REDACTED], along with:

- their estimated market share, and
- any CFPB supervisory or enforcement history, status, or plans.

For completeness, the list includes [REDACTED], which [REDACTED] but has been the subject of a CFPB examination.

I recommend including the highlighted institutions in upcoming global efforts. As you will see, these are mainly [REDACTED], and all of them are either past, current, or future subjects of CFPB activity. Although [REDACTED] entities are highlighted, there are [REDACTED] ([REDACTED]), meaning that only [REDACTED] institutions would be included. If you want to trim the list slightly, [REDACTED] could be excluded given its size. If, on the other hand, you want to expand the list, the candidates next in line [REDACTED] are [REDACTED] and [REDACTED].

Given the scope of our authority, the breadth of our work to date, and the likelihood that global efforts will focus largely on dealer markup and compensation practices, I recommend excluding lenders over which the CFPB does not currently have jurisdiction ([REDACTED]) and lenders whose business models we understand to be largely direct in nature ([REDACTED]) or otherwise unique ([REDACTED]).

Lender	Market Share	CFPB Supervisory or Enforcement History, Status, and/or Plans
[REDACTED] Ally	[REDACTED]	Examination in progress.
[REDACTED]	[REDACTED]	Concluded ENF action with enhanced CMS.
[REDACTED]	[REDACTED]	Concluded SUP action with enhanced CMS.
American Honda Finance	[REDACTED]	Concluded SUP action with enhanced CMS.
[REDACTED]	[REDACTED]	Open ENF investigation.
[REDACTED]	[REDACTED]	Open ENF investigation.
[REDACTED]	[REDACTED]	Open ENF investigation.
[REDACTED]	[REDACTED]	Open ENF investigation.
[REDACTED]	[REDACTED]	Proposed SUP action with enhanced CMS.
[REDACTED]	[REDACTED]	Part of [REDACTED] (see above).
[REDACTED]	[REDACTED]	Examination completed with MRA on enhanced CMS.
[REDACTED]	[REDACTED]	Open ENF investigation following examination.
[REDACTED]	[REDACTED]	Open ENF investigation.
[REDACTED]	[REDACTED]	Open ENF investigation.
[REDACTED]	[REDACTED]	Open ENF investigation following examination.
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Examination in progress.
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Concluded SUP action with enhanced CMS.
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	No past or future plans; [REDACTED]
[REDACTED]	[REDACTED]	Proposed SUP action with enhanced CMS.
[REDACTED]	[REDACTED]	Examination in progress.
[REDACTED]	[REDACTED]	Not under CFPB jurisdiction.
[REDACTED]	[REDACTED]	Closed ENF investigation.
[REDACTED]	[REDACTED]	Concluded SUP action [REDACTED]
[REDACTED]	[REDACTED]	Examination in progress.
[REDACTED]	[REDACTED]	Examination in progress; [REDACTED]
[REDACTED]	[REDACTED]	No past or future plans.
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Proposed for examination [REDACTED]
[REDACTED]	[REDACTED]	Closed ENF investigation.
[REDACTED]	[REDACTED]	Part of [REDACTED] (see above).
[REDACTED]	[REDACTED]	Proposed SUP action with enhanced CMS.