

Banking and Finance Law Daily Wrap Up, ENFORCEMENT ACTIONS— **CFPB terminates five consent orders, (Sept. 23, 2025)**

Banking and Finance Law Daily Wrap Up

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In each case, the Bureau is ending periods of heightened compliance and cooperation by the four companies ahead of the schedule agreed to in the consent orders.

Consumer Financial Protection Bureau Acting Director Russel Vought has terminated five consent orders dating as far back as 2013. The terminations, all effective September 18, include consent orders against [Apple, Inc.](#); [U.S. Bank N.A.](#); [Washington Federal Bank N.A.](#); [Planet Home Lending, LLC](#); and a second order against [Washington Federal](#). While all four companies have paid the penalties required by the consent orders, the termination of the orders end periods of enhanced compliance and cooperation years ahead of the schedule listed in the original consent orders.

Apple. The consent order against Apple Inc. was issued on Oct. 23, 2024, after the Bureau determined that Apple illegally mishandled transaction disputes and misled Apple buyers of Apple devices about interest-free payment options (see [Banking and Finance Law Daily](#), Oct. 23, 2024). Apple has paid \$25 million in civil money penalties.

Planet Home Lending. Issued for improperly accepting fees in exchange for referring consumers seeking to refinance, the consent order against Planet Home Lending was issued on Jan. 31, 2017 (see [Banking and Finance Law Daily](#), Feb. 1, 2017). In announcing the termination, the CFPB said that Planet Home Lending has fulfilled several obligations under the consent order, including implementing a redress plan and paying consumer redress of \$265,000.

U.S. Bank. The consent order against U.S. Bank was issued on Dec. 19, 2023, to settle allegations of violations to the administration of unemployment insurance benefit prepaid debit cards, among other things (see [Banking and Finance Law Daily](#), Jan. 5, 2024). U.S. Bank has paid a civil money penalty of \$15 million.

Washington Federal. The first consent order against Washington Federal was issued on Oct. 9, 2013, for violations of the Home Mortgage Disclosure Act (HMDA) (see [Banking and Finance Law Daily](#), Oct. 9, 2013). Washington Federal has paid the \$34,000 civil money penalty related to this order. The second consent order against Washington Federal was issued on Oct. 27, 2020, finding that the bank reported inaccurate HMDA data about its mortgage transactions for 2016 and 2017 (see [Banking and Finance Law Daily](#), Oct. 28, 2020). Washington Federal has paid the \$200,000 civil money penalty due for this HMDA violation, the CFPB noted.

Companies: Apple Inc.; Planet Home Lending, LLC; U.S. Bank National Association; Washington Federal N.A.

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