

# Exhibit 4

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL TREASURY  
EMPLOYEES UNION, *et al.*,  
*Plaintiffs,*

v.

RUSSELL VOUGHT, in his official  
capacity as Acting Director of the  
Consumer Financial Protection  
Bureau, *et al.*,

*Defendants.*

Case No. 25-cv-381-ABJ

**DECLARATION OF ERIE MEYER**

I, Erie Meyer, declare the following under penalty of perjury:

1. I served as the Chief Technologist and Senior Advisor to the Director at the Consumer Financial Protection Bureau from October 2021 until February 7, 2025, when I resigned. Prior to my most recent position, I served as a founding member of the Technology and Innovation Unit at the Bureau from March 2011 to September 2013. Based on that work, I have personal knowledge of numerous aspects of the Bureau's work.

2. That includes how the Bureau's Consumer Response and Education Division works. As a Senior Advisor, my portfolio included the work of Consumer Response.

3. Consumer Response was established to provide consumers with a way to lodge complaints that the Bureau then monitors and ensures receive a timely and appropriate response from the company that is the subject of the

complaint. The Bureau also posts for public consumption a database of complaints. Both Bureau staff and contractors perform different aspects of this work.

4. The Bureau receives consumer complaints about everything from credit reporting to debt collection to imminent foreclosures.

5. For example, consumers often file credit reporting complaints when they are seeking a car or home loan, and false credit reporting is preventing them from getting that loan. These complaints are frequently very time-sensitive because the consumer's home purchase will fall through if they cannot get a mortgage in time or because they urgently need a car to get to work or drive their kids to school, which they cannot get without a car loan.

6. The majority of complaints about debt collection are about attempts to collect debt not owed. Medical debt, for example, can be riddled with errors, involve many parties (the medical provider, the insurance, the debt collector, a credit reporting agency, etc.), and consumers often report getting the runaround in nailing down the facts between those parties. Again, debt collection complaints can be quite time-sensitive because absent resolution, they can result in negative credit reporting, which impedes consumers' ability to rent an apartment, get a mortgage, or buy a car.

7. Most complaints about mortgages are focused on trouble during the payment process, specifically successfully submitting payment. There

have been outages, security issues, and other system problems at mortgage servicing companies that have left consumers in a lurch. If the problem is not resolved in time with the help of a complaint, the consumer can receive negative information on their credit reports for something beyond their control. Those credit report errors are extremely hard to prove without the documentation that comes from a timely complaint submitted when the system error occurred.

8. Additionally, consumers who are filing complaints about foreclosures typically have worked with their servicer and come to a dead end. This is a last effort to get to the bottom of what is going on with their mortgage and save their home. Those complaints being delayed or stuck can devastate a family who is forced to leave a home they should not be forced to leave.

9. Consumer Response accepts complaints online, by phone, by mail, by referral from other agencies (including OCC, FDIC, NCUA, and the White House), and by referral from members of Congress.

10. It is common for members of Congress to refer complaints to Consumer Response, and this happens daily when constituents call congressmembers seeking help with consumer financial issues. There is no other mechanism in place for Congressmembers to seek help from the Bureau for constituents.

11. Consumer Response receives on average approximately 350,000 complaints per month. That number is sometimes higher: In January 2025, it was approximately 500,000.

12. When a complaint is filed, it is sent to the company about whom the complaint was lodged. That company is generally required to respond within 15 days. And it must report its response to the CFPB.

13. Although many complaints are sent automatically to companies, many require the intervention of CFPB staff or contractors. For example, if a complaint is filed about a company that is already listed in the CFPB's consumer complaint system, the complaint can be automatically routed to the company for a response. But if the company is not yet listed, a CFPB employee must onboard the company to the Consumer Response system before the complaint can be processed. Similarly, if a consumer mistypes the name of a company or inputs the company's name in a way that does not match the company's name in the system, a CFPB employee or contractor must process the complaint.

14. If a consumer files a complaint but does not have an email address, a contractor must communicate with the consumer via postal mail.

15. Additionally, there is no automated processing for complaints lodged through the Bureau's hotline, made by referral, or sent in through the

mail. A CFPB employee or contractor is required to process each of these complaints.

16. Only CFPB employees can make determinations on which companies to onboard to the system. Contractors work on how to route referrals or more complex complaints. This means that even with a work stoppage of a few days, thousands of consumers are stuck in limbo. Not only will they not get help or answers on their complaints; other law enforcement agencies that depend on information from the CFPB's database will not have access to that information.

17. In addition to the CFPB employees and contractors that process complaints, CFPB employees also help ensure that complaints get a response—and facilitate resolution of many complaints. For example, there is a team of CFPB employees that monitors whether companies provide timely responses and can contact the companies if they don't. There is an Escalated Case Management Team that helps consumers who, for example, are subject to imminent foreclosure and, more generally, helps facilitate complaint resolution when a company fails to respond or when its response is inadequate. The Escalated Case Management Team handles roughly a thousand complaints a year.

18. Consumer Response also monitors the complaint database and brings companies to the attention of the enforcement division for potential investigation.

19. Filing a complaint with the CFPB is often successful in resolving consumers' issues. Indeed, the Bureau frequently gets reports that filing a complaint with the CFPB was the only thing that successfully stopped false credit reporting or halted an erroneous foreclosure, despite the consumer having previously tried themselves to solve the problem directly with the company.

20. When the Consumer Response department is operating, consumers receive a response in 15 days or less in 98 percent of complaints sent to the company.

21. Consumer complaints are often urgent to the consumer, regardless of whether they go to the Escalated Case Management Team.

22. For example, the majority of complaints filed relate to consumer credit reports, and most people do not become aware of an error on their reports—and thus lodge a complaint—until they are trying to secure a loan.

23. Another example is consumers who lose access to their accounts via “debanking”—when a consumer is denied access to their account—and face banks unwilling to work with them to restore the accounts or address what happened. Consumer Response is often the only resource available for them to get more information or re-access their accounts. Consumers otherwise have no access to their accounts and no information about what went wrong.

24. Consumers who complain about payday loans are primarily reporting that there are fees or interest they didn't expect. Consumers who use payday loans typically do not have other options available to them, and are experiencing severe liquidity issues. Unexpected charges, and not being able to submit a complaint, for a person in this situation can mean not having enough bus fare to make it to work on time and losing a job, skipping or rationing medications that are dangerous to skip or ration, or losing a badly-needed childcare slot due to insufficient funds.

25. In the past week, Russel Vought directed Bureau staff to stop all work. I understand that not only have all Bureau employees been ordered to stop working, but all contracts for the companies that provide the infrastructure and the additional workforce needed to staff Consumer Response were cancelled.

26. That means that the Escalated Case Management team is not working—and therefore nobody is helping consumers with imminent foreclosures or to facilitate other time-sensitive complaint resolution when the company does not adequately respond. Complaints submitted online about companies that are not already in the system or where the company name inputted by the consumer does not match the one in the system are not being processed at all. Nobody is reviewing the mail to process mailed-in complaints or referrals, no one is processing referrals from agencies or Congress, and no one is sending mail to complainants without email



addresses. By now, there are likely thousands of complaints that have gone unprocessed. In addition, no one is monitoring company response times to the complaints that continue to be forwarded automatically online, ensuring that companies respond at all to those complaints, or bringing companies to the attention of the enforcement division.

27. The hotline normally available for people to lodge complaints from 8:00 a.m. to 8:00 p.m. was down for the first time since we launched the CFPB without anyone able to work on the continuity of operations plan that this mission essential function requires. And this happened on a day it should have been open and was no longer accepting complaints. Although I understand that there is some possibility that this contract—and only this contract—has been un-terminated, that limited restoration would still leave Consumer Response non-functional.

28. Even the automated complaint forwarding is likely to break down soon. CFPB employees that manage the data pipeline for automated forwarding have been ordered to stop work. Contractors are responsible for continuously managing the functionality of the online system that consumers use and that takes on more than a million complaints a year. I understand that that contract, too, was cancelled. Without regular maintenance of that system, it will cease to function and crash.

29. When I reviewed the complaints database the evening of February 13, the most recent complaint posted is from January 29. That is a change

from earlier today when the database showed complaints from February. This means that the system is already experiencing a significant error and likely breaking down.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 13, 2025

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/s/ 

Erie Meyer