

[REDACTED]

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**From:** Martinez, Adam (CFPB) <[REDACTED]>  
**Sent:** Monday, February 10, 2025 12:00 PM  
**To:** Chilbert, Christopher (CFPB); Chang, Jean (CFPB)  
**Cc:** Broeksmit, Samuel (CFPB); Gueye, Jafnar (CFPB)  
**Subject:** RE: Additional Directives on Bureau Activities

Yes, I think that is a wise thing to do. Please feel free to create the list and provide to our contracting team. AO did something similar this weekend.

Thank you.

Adam

Adam Martinez  
Chief Operating Officer

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**From:** Chilbert, Christopher (CFPB) <[REDACTED]>  
**Sent:** Monday, February 10, 2025 11:58 AM  
**To:** Martinez, Adam (CFPB) <[REDACTED]>; Chang, Jean (CFPB) <[REDACTED]>  
**Cc:** Broeksmit, Samuel (CFPB) <[REDACTED]>; Gueye, Jafnar (CFPB) <[REDACTED]>  
**Subject:** RE: Additional Directives on Bureau Activities

Adam,

I have received a request whether it is an acceptable work task to proactively identify a list of contractors who would be necessary to support operational emergencies. I've done this before when there have been government shut-downs in other agencies. If there are contractual stop work orders, then we would not get their support in case of an emergency, and I'd like to get in front of that.

Chris Chilbert

[REDACTED]

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**From:** Martinez, Adam (CFPB) <[REDACTED]>  
**Sent:** Monday, February 10, 2025 8:54 AM  
**To:** Chilbert, Christopher (CFPB) <[REDACTED]>; Chang, Jean (CFPB) <[REDACTED]>  
**Subject:** RE: Additional Directives on Bureau Activities

That is all correct. The USDS Team will let you or me know if any other work is needed. We'll do the same level of support as we have the past couple of days.

Adam Martinez  
Chief Operating Officer

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**From:** Chilbert, Christopher (CFPB) <[REDACTED]>  
**Sent:** Monday, February 10, 2025 8:53 AM  
**To:** Martinez, Adam (CFPB) <[REDACTED]>; Chang, Jean (CFPB) <[REDACTED]>  
**Subject:** FW: Additional Directives on Bureau Activities

Adam/Jean,

I want to clarify the level of support we should be providing based on this email. I think the minimum is:

- 1) Onboarding new political leadership and providing them with necessary service desk support to them
- 2) Performing security monitoring tasks for our networks
- 3) Supporting US DOGE members with requests
- 4) Perform any maintenance tasks needed to ensure that the HMDA application, Consumer Complaint Database operate, ServiceNow, and Microsoft365 platform (email/SharePoint) continue to operate.
- 5) Support any other requests from the Acting Director or new political leadership.

I think this is the minimum, but I want to confirm before giving the team direction.

Chris Chilbert  
[REDACTED]

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**From:** Vought, Russell <[REDACTED]>  
**Sent:** Monday, February 10, 2025 8:30 AM  
**To:** \_DL\_CFPB\_AllHands <[REDACTED]>  
**Subject:** Additional Directives on Bureau Activities

Good morning, CFPB staff,

As you have been informed by the Chief Operating Officer in an email yesterday, the Bureau's DC headquarters building is closed this week. Employees should not come into the office. Please do not perform any work tasks. If there are any urgent matters, please alert me through Mark Paoletta, Chief Legal Officer, to get approval in writing before performing any work task. His email is [REDACTED]. Otherwise, employees should stand down from performing any work task. Thank you for your attention on this matter.

Best,

Russ Vought

Acting Director

Bureau of Consumer Financial Protection

**From:** [Johnson, Christopher \(CFPB\)](#)  
**To:** [Elliott, Shannon \(CFPB\)](#); [Aujla, Lucky \(CFPB\)](#); [Russell, Kesa \(CFPB\)](#); [Galicki, Joshua \(CFPB\)](#); [Gueye, Jafnar \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#)  
**Cc:** [Dorsey, Darian \(CFPB\)](#); [Pfaff, Matthew \(CFPB\)](#); [Kothari, Anand \(CFPB\)](#); [Chilbert, Christopher \(CFPB\)](#); [Rogers, Morgan \(CFPB\)](#); [Bark, David \(CFPB\)](#); [Beres, Tonya \(CFPB\)](#)  
**Subject:** Contracts in support of the Bureau's complaint handling operations  
**Date:** Monday, February 10, 2025 1:55:38 PM

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Hello team,

I understand from discussions with the COO, Adam Martinez, that the work stoppage will not apply to the Bureau's Consumer Resource Center aka Contact Center Services Contract. Thank you for resolving this matter.

Per conversations, the Deloitte Mosaic O&M contract for operations, maintenance, monitoring of the complaint system is critical to ensure consumers and companies can submit and respond to consumer complaints, as well as the contact center agents can address caller inquiries, including intaking of complaints by phone and sharing status of complaints. In addition, we have a few subscription services that support the complaint management system, they include Adaptus (EZProtect virus scan of consumer attachments, Address Doctor to support statutorily required communications to consumers throughout the complaint process, Provar automated testing tool). As these contracts are critical to support the complaint management system, we would like to request approval to continue to move forward with these investments a well.

Thank you, and please let me know if you have any questions. We will await guidance from the Operations Division's Office of Finance and Procurement.

Christopher Johnson  
Associate Director | Division of Consumer Response and Education  
Office: [REDACTED] | Mobile: [REDACTED]

Bureau of Consumer Financial Protection  
[consumerfinance.gov](https://consumerfinance.gov)

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**From:** [Brown, Jason \(CFPB\)](#)  
**To:** [Paoletta, Mark \(CFPB\)](#)  
**Cc:** [Dietrich, Jason \(CFPB\)](#); [Pappalardo, Janis \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#)  
**Subject:** RE: APOR work paused  
**Date:** Tuesday, February 11, 2025 12:23:07 PM

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Confirmed.

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**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Tuesday, February 11, 2025 12:02 PM  
**To:** Brown, Jason (CFPB) [REDACTED]  
**Cc:** Dietrich, Jason (CFPB) [REDACTED]; Pappalardo, Janis (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Subject:** RE: APOR work paused

Jason,

The APOR and all work associated with gathering and publishing this information on a weekly basis are exempt indefinitely from this stop work order. I am specifically directing you (and any other colleague necessary to publish the APOR) to continue indefinitely to perform all tasks necessary to publish the APOR on weekly basis.

Please confirm receipt and your acknowledgment of my directive.

Thank you.

Mark Paoletta  
Chief Legal Officer  
CFPB

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**From:** Brown, Jason (CFPB) [REDACTED]  
**Sent:** Tuesday, February 11, 2025 9:26 AM  
**To:** Paoletta, Mark (CFPB) [REDACTED]  
**Cc:** Dietrich, Jason (CFPB) [REDACTED]; Pappalardo, Janis (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Subject:** RE: APOR work paused

Message received. We will continue publication of the APOR this Thursday. If you have further guidance on future publications of the APOR, please let us know. Otherwise, we will assume that the APOR may be published for this week only and we will need to seek permission again next week and going forward.

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**From:** Paoletta, Mark [REDACTED]  
**Sent:** Monday, February 10, 2025 7:15 PM  
**To:** Brown, Jason (CFPB) [REDACTED]  
**Cc:** Dietrich, Jason (CFPB) [REDACTED]; Pappalardo, Janis (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Subject:** RE: APOR work paused

Good evening, Jason,

Thanks for email. The task of doing the work to publish the Average Prime Offer Rate (APOR) and publishing it are exempted from the stop work order. Specifically, you are directed to continue the work to take in data from ICE Mortgage Technology and to continue to construct the weekly APOR for publication this Thursday. You are directed to perform any work that needs to be done to publish the APOR by Thursday.

Please confirm your receipt of this email and that you will perform the necessary work to publish the APOR by Thursday.

Thank you.

Mark Paoletta  
Chief Legal Officer  
CFPB

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**From:** Brown, Jason (CFPB) [REDACTED]  
**Sent:** Monday, February 10, 2025 4:43 PM  
**To:** Paoletta, Mark [REDACTED]  
**Cc:** Dietrich, Jason (CFPB) [REDACTED]; Pappalardo, Janis (CFPB)  
[REDACTED]  
**Subject:** APOR work paused

Hi Mark,

Just an FYI that, per the Acting Director's directives to stop work tasks and issuance of stop work orders for contractors, the Office of Research is pausing the intake of data from ICE Mortgage Technology and the construction of the weekly average prime offer rates (APOR), which are used for various federal mortgage rules. These APORs are usually updated every Thursday. Please let Jason (cc'd here) or me know if there are any questions.

Jason Brown  
Assistant Director, Research  
Consumer Financial Protection Bureau

**From:** [Paoletta, Mark \(CFPB\)](#)  
**To:** [Gueye, Jafnar \(CFPB\)](#)  
**Cc:** [Young, Christopher \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#); [Wick, Jordan \(CFPB\)](#)  
**Subject:** Cancellation of CFPB contracts  
**Date:** Tuesday, February 11, 2025 4:32:33 PM

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Good afternoon, Jafnar,

On behalf of Acting Director Vought, I have reviewed CFPB contracts and authorize and direct the cancellation of all contracts in the following divisions: Enforcement (102 contracts), Supervision (16 contracts), External Affairs (3 contracts), Consumer Response (20 contracts), Office of Director (33 contracts), and Legal Division (all except 2 contracts – FD Online Licenses and litigation data). Further, on behalf of the Acting Director, I direct the cancellation of the contract for concrete repairs.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [White, Sonya \(CFPB\)](#)  
**Cc:** [Paoletta, Mark \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: Legal Assistance with Procurement Template for Contract Termination  
**Date:** Friday, February 21, 2025 11:30:00 AM

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Hi Sonya – (+Mark P. and Dan for Situational Awareness)

Legal Division is authorized to support all operational matters being exercised on behalf of our new leadership and our regulatory/statutorily requirements including:

Procurement/Contract Actions  
Financial Management Actions  
Human Capital Actions  
Labor Relations Actions  
Employee Relations Actions  
Ethics Actions including vetting of new PAS/SCH Cs  
Technology and Infrastructure Support  
Administrative Operations Actions (Security, facilities, maintenance)  
Data Governance/Administration  
EEO Processing Counsel Support  
Reasonable Accommodation Counsel Support

Mission related support should be coordinated directly through Mark or Dan.

Adam

Adam Martinez  
Chief Operating Officer

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**From:** White, Sonya (CFPB) [REDACTED] >  
**Sent:** Friday, February 21, 2025 11:15 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Subject:** Legal Assistance with Procurement Template for Contract Termination

Hi Adam

Josh reached for a legal review on the contract termination template. Confirming that LD is authorized to assist?

Thanks  
Sonya

Sonya A. White (she/her/hers)  
Deputy General Counsel  
General Law & Ethics | Legal Division  
Office: [REDACTED] | Mobile: [REDACTED]

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**From:** [Chilbert, Christopher \(CFPB\)](#)  
**To:** [Martinez, Adam \(CFPB\)](#)  
**Subject:** RE: FDIC request for HMDA status update  
**Date:** Friday, February 21, 2025 3:18:59 PM

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We're going to request that FDIC go through Mark Paoletta if they want an update. We are doing our best effort to support the data collection, but it is at risk due to several contracts being terminated. We've requested that three of them be turned on, at least temporarily.

Chris Chilbert  
[REDACTED]

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Friday, February 21, 2025 2:58 PM  
**To:** Chilbert, Christopher (CFPB) [REDACTED]  
**Subject:** RE: FDIC request for HMDA status update

If it's a technical assistance meeting, I would say, yes, he should attend. If it's policy, reg, enf, etc. related, then it should go through Mark. We should not commit to anything.

Adam Martinez  
Chief Operating Officer

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**From:** Chilbert, Christopher (CFPB) [REDACTED]  
**Sent:** Friday, February 21, 2025 2:55 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Subject:** FW: FDIC request for HMDA status update

Adam,  
FDIC reached out to Eric Spry requesting for him to join a meeting regarding the status of HMDA collection. Is it ok for him to attend this meeting, or do we need Mark Paoletta's approval?

Chris Chilbert  
[REDACTED]

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**From:** Spry, Eric (CFPB) [REDACTED]  
**Sent:** Friday, February 21, 2025 2:48 PM  
**To:** Chilbert, Christopher (CFPB) [REDACTED]  
**Cc:** Shelton, Monica (CFPB) [REDACTED]  
**Subject:** FDIC request for HMDA status update

Hi Chris,

I was contacted via Teams chat by Chris Rangert at FDIC. He requested a meeting with myself,

CFPB\_00009

Stuart Hoff (FDIC HMDA Subcommittee member) and Paul Robin (FDIC).

Chris Rangert said,

“My supervisor, Paul Robin and Stuart Hoff will reach out to you for a meeting at 3:00 (I won't be able to attend). They are trying to figure out the situation with HMDA filings, Help response lines and such.”

I am happy to provide simple status update. Normally the HMDA Subcommittee chair at CFPB, Hallie Ryan, would be the primary contact. I'm checking to see if Hallie is available.

Please let me know if I should join the FDIC meeting today at 3p ET or if I should ask FDIC to make a request to the CFPB Acting Director.

Best,

-Eric

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Eric W. Spry  
Regulatory Technology Program Manager  
CFPB Technology & Innovation  
Office: Remote / Pacific Time

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[consumerfinance.gov](https://www.consumerfinance.gov)

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**From:** [Chilbert, Christopher \(CFPB\)](#)  
**To:** [Fiano, Liane \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#); [Warren, LaShaun \(CFPB\)](#)  
**Cc:** [Gilford, Samuel \(CFPB\)](#); [Gueye, Jafnar \(CFPB\)](#); [Michalosky, Martin \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#); [Licata, Anthony](#)  
**Subject:** RE: Sprinklr - Social Media Records  
**Date:** Tuesday, February 25, 2025 4:48:22 PM

---

Hi Liane,

If the contract with Sprinklr has our standard cybersecurity terms and conditions, they are required to provide us with any CFPB data upon request at the termination of the contract.

Thanks,

Chris Chilbert  
[REDACTED]

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**From:** Fiano, Liane (CFPB) [REDACTED]  
**Sent:** Tuesday, February 25, 2025 1:43 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]; Warren, LaShaun (CFPB) [REDACTED]  
**Cc:** Gilford, Samuel (CFPB) [REDACTED]; Chilbert, Christopher (CFPB) [REDACTED]; Gueye, Jafnar (CFPB) [REDACTED]; Michalosky, Martin (CFPB) [REDACTED]; Shapiro, Daniel (CFPB) [REDACTED]; Licata, Anthony [REDACTED]  
**Subject:** RE: Sprinklr - Social Media Records

Social media is not a legally required function. However, maintaining the records is required.

I don't believe we have any other systems that fall into that category. I will acknowledge that we will still have a gap in records prior to 2017 (when I joined the CFPB and we began using the system), though I am unclear how far back the records schedule requires we maintain social media records.

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Tuesday, February 25, 2025 1:38 PM  
**To:** Fiano, Liane (CFPB) [REDACTED]; Warren, LaShaun (CFPB) [REDACTED]  
**Cc:** Gilford, Samuel (CFPB) [REDACTED]; Chilbert, Christopher (CFPB) [REDACTED]; Gueye, Jafnar (CFPB) [REDACTED]; Michalosky, Martin (CFPB) [REDACTED]; Shapiro, Daniel (CFPB) [REDACTED]; Licata, Anthony [REDACTED]  
**Subject:** RE: Sprinklr - Social Media Records

Was the account part of a statutorily required function and/or legally required?

What other systems does your office maintain that may store data outside of the CFPB servers or cloud?

I would advise that you work with Jafnar's team to find out if the company will provide you with a download of your records.

Adam Martinez  
Chief Operating Officer

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**From:** Fiano, Liane (CFPB) [REDACTED]  
**Sent:** Tuesday, February 25, 2025 1:34 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]; Warren, LaShaun (CFPB) [REDACTED]  
**Cc:** Gilford, Samuel (CFPB) [REDACTED]; Chilbert, Christopher (CFPB) [REDACTED]; Gueye, Jafnar (CFPB) [REDACTED] Michalosky, Martin (CFPB) [REDACTED]  
**Subject:** RE: Sprinklr - Social Media Records

Sprinklr is a software license that manages our social media accounts, it is not a social media channel itself. Our primary records were on the social media channels themselves. Our backup records were in Sprinklr as our software publishing tool. They could be searched and exported at any point, which makes it more effective for records retention. I have had several discussions with the records team over time, but I don't know with what level of specificity they may recall those discussions.

Had we known that the channels were going to be deleted, we could have taken steps to preserve a hard copy on CFPB systems. I was unaware that our backup system was also being compromised. I am not sure if the contract was cut, but that would be my guess as to why we are not able to access it anymore. If that's not the case, I may seek authorization with the Legal team to investigate further.

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Tuesday, February 25, 2025 1:28 PM  
**To:** Fiano, Liane (CFPB) [REDACTED]; Warren, LaShaun (CFPB) [REDACTED]  
**Cc:** Gilford, Samuel (CFPB) [REDACTED]; Chilbert, Christopher (CFPB) [REDACTED]; Gueye, Jafnar (CFPB) [REDACTED]; Michalosky, Martin (CFPB) [REDACTED]  
**Subject:** RE: Sprinklr - Social Media Records

Could you provide additional background? Is Sprinklr a subscription? Was the Records Team aware that records were being held on this social media site?

Adam Martinez  
Chief Operating Officer

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**From:** Fiano, Liane (CFPB) [REDACTED] >  
**Sent:** Tuesday, February 25, 2025 1:25 PM  
**To:** Warren, LaShaun (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]; Gilford, Samuel (CFPB) [REDACTED]

[REDACTED]

**Subject:** Sprinklr - Social Media Records

Hi LaShaun –

I no longer have access to Sprinklr, which is where our social media backup records are maintained. We have hard copy exports for Director Chopra’s account, but everything else lived within Sprinklr and on our public channel.

As the public channels were removed unexpectedly, we may not be in compliance with our records retention requirements.

--

Liane Fiano

Staff Director, Digital Communications | Office of Communications

Office: ([REDACTED]) | Mobile: ([REDACTED])

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**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Dasgupta, Richa \(CFPB\)](#); [Gueye, Jafnar \(CFPB\)](#); [Chilbert, Christopher \(CFPB\)](#)  
**Cc:** [Petersen, Cara \(CFPB\)](#); [Gelfond, Rebecca \(CFPB\)](#); [Licata, Anthony](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: Consumer Sentinel Account Deactivation Warning...  
**Date:** Tuesday, February 25, 2025 5:05:00 PM

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Richa –

Please work through Rebecca and Cara to coordinate with Jafnar’s Team. If there are concerns regarding data preservation issues and/or application to statute or legal requirements I’d recommend that Enforcement also work with Mark P. to advise him on what is needed.

Adam

Adam Martinez  
Chief Operating Officer

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**From:** Dasgupta, Richa (CFPB) [REDACTED]  
**Sent:** Tuesday, February 25, 2025 9:55 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Petersen, Cara (CFPB) [REDACTED]; Gelfond, Rebecca (CFPB) [REDACTED]; Dasgupta, Richa (CFPB) [REDACTED]  
**Subject:** FW: Consumer Sentinel Account Deactivation Warning...

Adam -

Are you able to advise about this?

Thanks,  
Richa

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**From:** Smullin, Rebecca (CFPB) [REDACTED]  
**Sent:** Tuesday, February 25, 2025 8:53 AM  
**To:** Dasgupta, Richa (CFPB) [REDACTED]  
**Subject:** FW: Consumer Sentinel Account Deactivation Warning...

Richa:

I am forwarding you an email that explains that, with some time sensitivity, I need to log into my Consumer Sentinel account to preserve my access.

I am flagging this time-sensitive account issue because my Sentinel account is connected to several holds that I placed on searches of Sentinel data related to Bureau matter(s) for which Bureau litigation holds in place.

For further reference:

1. Sentinel has a function to allow users to put holds on data that Sentinel would otherwise purge. I do not know what would happen to these holds if my account expired, since the holds are ones attached to my account.
2. To prevent my account from expiring, all I need to do is log in (which could also require resetting my password); I would not need to undertake any substantive use of data.
3. The email I received on Sat Feb 22 says I have two weeks to address this. To err on the safe side (and in case I need to call anyone for help resetting a password), I would recommend addressing this during business hours, prior to March 7.

Do you have authority to provide me permission to login to the system to preserve my account? If not, could I ask someone else?

Thank you.

Best,

Rebecca Smullin  
Senior Litigation Counsel | Office of Enforcement  
Office: [REDACTED] Mobile: [REDACTED]

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[consumerfinance.gov](https://consumerfinance.gov)

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**From:** [no-reply@consumersentinel.gov](mailto:no-reply@consumersentinel.gov) <[no-reply@consumersentinel.gov](mailto:no-reply@consumersentinel.gov)>

**Sent:** Saturday, February 22, 2025 2:16 AM

**To:** Smullin, Rebecca (CFPB) [REDACTED]

**Subject:** Consumer Sentinel Account Deactivation Warning...

Your Consumer Sentinel Network account will expire in two weeks due to inactivity. Please login to <https://www.consumersentinel.gov> to retain your access.

Please do not reply to the email, as its inbox is not being monitored.

The Consumer Sentinel Network Team.

**From:** [Johnson, Christopher \(CFPB\)](#)  
**To:** [Paoletta, Mark \(CFPB\)](#)  
**Cc:** [Martinez, Adam \(CFPB\)](#); [Dorsey, Darian \(CFPB\)](#); [Chilbert, Christopher \(CFPB\)](#); [Barrett, Katy \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: 20250213 CFPB Information Memo\_CRE  
**Date:** Thursday, February 27, 2025 8:06:01 AM

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Thank you for your confirmation, sir. Darian and I will begin to mobilize appropriate team members against each requests this AM. Take care.

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**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 6:03 AM  
**To:** Johnson, Christopher (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]; Dorsey, Darian (CFPB) [REDACTED]; Chilbert, Christopher (CFPB) [REDACTED]; Barrett, Katy (CFPB) [REDACTED] Shapiro, Daniel (CFPB) [REDACTED]  
**Subject:** RE: 20250213 CFPB Information Memo\_CRE

Good morning, Christopher,

Thanks for email. Your requests (1,2,3 below) are approved.

Mark

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**From:** Johnson, Christopher (CFPB) [REDACTED]  
**Sent:** Wednesday, February 26, 2025 11:01 AM  
**To:** Paoletta, Mark (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]; Dorsey, Darian (CFPB) [REDACTED]; Chilbert, Christopher (CFPB) [REDACTED]; Barrett, Katy (CFPB) [REDACTED]  
**Subject:** FW: 20250213 CFPB Information Memo\_CRE

Hello Chief Legal Officer Paoletta,

I hope all is well. First, I wanted to take moment to introduce myself. My name is Chris Johnson and I currently serve as the Associate Director within the Division of Consumer Response of Education. For background, the division brings together two of the Bureau's six primary functions and at its most consumer facing capabilities – assisting consumers with complaints and providing consumers with unbiased financial education content, tools, and resources. Per the email chain below, I was invited to participate in a brief meeting with Jordan and Jeremy to share an overview of the CFPB's statutory obligations as it relates to the division's work in support of defining competitive areas, those that could aid in accurately defining critical areas for purposes of a RIF process. The attached memorandum was requested the same day and produced by my team.

I'm reaching out today, as we (Darian and I) received a question from our complaint handling counterparts at the FDIC seeking to understand whether and to what extend we're still processing



complaints and referrals. As referenced in the memorandum, and thanks to approvals from the Acting Director and his leadership team, the Consumer Resource Center (aka call center services contract) and online complaint form are operational. However, a subset of Consumer Response federal staff historically performs many other complaint tasks. I shared with Jordan and Jeremy during our discussion while several aspects of the complaint handling operation have been built to scale through years of work focused on automation and efficiency, there remain critical areas that require human intervention by our federal employees and a subset of contractors.

**The Ask:**

1. Per our Office of Procurement this AM (see attached), there is a request to activate the Contracting Officer Representative and two Program Managers that provide oversight of the call center contractor to address billing, technical, and governance requests. In addition, the technical issues that have arisen are typically addressed through a contract with Deloitte, "CUSTOMER RELATIONSHIP MANAGEMENT (CRM) OPERATIONS, MAINTENANCE AND DEVELOPMENT SUPPORT". The technical issues involve the manual process performed by contractors to remove or redact PII from complaints. Please let me know if you are amenable to reactivating up to three federal employees supporting this contact center program as well as the vendor/contractor that provides technical operations and maintenance support for the Complaint Management System. I have also copied my colleagues, Chris Chilbert, CIO, and Katy Barrett, EPT Lead, for awareness.
  
2. To assess complaint handling with a focus on identifying any processing backlogs or system issues, I'm seeking approval to activate a team of no more than 10 staff for up to 24 hours each (I can provide a list of employees if helpful). Some examples of the work this team would perform includes:
  - Assessing the volume and nature of backlogs across various work in progress queues (e.g., congressional and regulator referrals, portal support tickets)
  - Assessing our complaint related systems (Mosaic, Complaint Analytics, and the Consumer Complaint Database) to ensure important application programming interfaces (APIs) are operational to ensure sharing of data with the prudential regulators and the FTC, data pipelines in support of complaint sharing tools that are utilized by more than 125 state and federal agencies are operational, and monitoring licensing and other user limits related to the Salesforce Mosaic complaint management system in partnership with our colleagues in the Technology and Innovation Office.

The above would require what I'm referring to as **Phase 1 – Assessment**. This work would commence later today or tomorrow with your approval and likely conclude by end of business Monday or Tuesday of next week. Divisional leadership would then summarize the current state. **Phase 2** – within 24 to 48 hours of the conclusion of Phase 1, would include divisional leadership preparing a recommendation and sharing at your request, if desired. The recommendation may include a subset of Consumer Response federal staff, and potential contractors to activate to address any backlogs aligned narrowly to statutorily related complaint

tasks. This would include a description of the work to be performed, estimated hours per week, and staff.

3. Finally, the Office of Consumer Response, per section 1013(b)(3)(C) is required to produce a report to Congress each year. The good news is our team completed a good portion of the work in January. However, to ensure the Bureau meets its statutory deadline of March 31, 2025, I would like to request to activate up to approximately (8) Consumer Response staff throughout the month of March for up to (16) hours per week to finalize the report. We also want to ensure we provide sufficient lead time for the Acting Director and his leadership to review and provide feedback, prior to the Bureau submitting the report to the required committees in Congress. Please let me know if you are supportive of this request as well.

---

1013(b)(3)(C)	(C) REPORTS TO THE CONGRESS.—The Director shall present an annual report to Congress not later than March 31 of each year on the complaints received by the Bureau in the prior year regarding consumer financial products and services. Such report shall include information and analysis about complaint numbers, complaint types, and, where applicable, information about resolution of complaints.	<i>Consumer Response cited to this authority in Federal Register notice 2012-15161.</i> Consumer Response publishes an annual report, in accordance with this mandate. Additionally, the Bureau’s semi-annual reports to Congress have a section devoted to discussion of Consumer Response.
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Below are a few prior year reports for reference, if helpful.

<https://www.consumerfinance.gov/data-research/research-reports/consumer-response-annual-report-2023/>

<https://www.consumerfinance.gov/data-research/research-reports/2022-consumer-response-annual-report/>

<https://www.consumerfinance.gov/data-research/research-reports/2021-consumer-response-annual-report/>

<https://www.consumerfinance.gov/data-research/research-reports/2020-consumer-response-annual-report/>

Upon your approval/guidance, we will quickly mobilize team members to initiate work on the three items described above. If you have any questions, our team is happy to discuss further at your convenience, sir.

Christopher Johnson

CFPB\_00018

Associate Director | Division of Consumer Response and Education  
Office: [REDACTED] | Mobile: [REDACTED]

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**From:** Johnson, Christopher (CFPB)  
**Sent:** Thursday, February 13, 2025 4:42 PM  
**To:** Wick, Jordan (CFPB) [REDACTED]; Lewin, Jeremy [REDACTED] >  
**Cc:** Martinez, Adam (CFPB) [REDACTED]  
**Subject:** 20250213 CFPB Information Memo\_CRE

Hello Jeremy and Jordon,

As requested, I have identified those teams/functions across the CRE division that are aligned to the division's statutory mandates. I have omitted those team/functions that do not to make the is easier to digest. The division has approximately 150 to 155 full-time employees. The current staffing for the statutory functions totals approximately 80 to 85. We could then apply the RIF framework to each of these areas and further adjust staffing as needed. Feel free to give me a call to assist with any further adjustments or refinements as needed. I will remain on standby throughout the night for questions or direction.

Christopher Johnson  
Associate Director | Division of Consumer Response and Education  
Office: [REDACTED] | Mobile: [REDACTED]

Bureau of Consumer Financial Protection  
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February 13, 2025

Information Memo for the Acting Director

**FROM** Christopher Johnson, Associate Director, Consumer Response & Education

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**SUBJECT** Divisional Staffing

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Select Applicable Information Type(s)	<input type="checkbox"/> Situational Awareness	<input type="checkbox"/> Request for Directional Feedback	<input checked="" type="checkbox"/> Reply to Inquiry from Director/FO	<input type="checkbox"/> Draft Document Feedback Request
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Issue

This purpose of this memorandum is to provide information about how the staff of the Consumer Response and Education Division align to the Consumer Financial Protection Bureau’s (CFPB’s) statutory obligations.

**Divisional Background**

The Consumer Response and Education Division (CRE) is responsible for executing the CFPB’s first two statutory functions: (1) conducting financial education programs, and (2) collecting, investigating, and responding to consumer complaints. *See* 12 USC 5511(c)(1)-(2). CRE is the public face of the CFPB to individuals and their families, delivering scalable services and tools designed to empower consumers to share their experiences in the marketplace, respond to challenges, and make better informed financial decisions.

There are two offices within CRE: the Office of Financial Education and the Office of Consumer Response. Financial Education is responsible for managing a suite of more than 50 educational tools and resources, distributing those tools to users, and researching the effectiveness of financial education programs. Financial Education is also responsible for supporting the Director’s membership in the Financial Literacy and Education Commission. Financial Education’s content is some of the most frequently visited content on the CFPB’s website.

Consumer Response is responsible for answering questions, handling complaints, and sharing data and insights. Consumer Response manages the CFPB’s toll-free number and complaint program from end-to-end. Consumer Response is also responsible for assisting complaint process stakeholders (e.g., responding to congressional members with their constituents’ complaints, assisting Company Portal users as they respond to their customer’s concerns) and sharing complaint information with Federal and State agencies.

**The current headcount for CRE is approximately 150-155 full-time employees. The functional areas listed below aligned to statutory responsibilities total approximately 80 to 85.**

### **Office of Financial Education**

12 USC 5493(d) requires the Director to “establish an Office of Financial Education, which shall be responsible for developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions.” There is one competitive area within the Financial Education, responsible for delivering several statutory obligations:

- Developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions. *See* 12 USC 5493(d)(1).
- Developing and implementing a strategy to improve the financial literacy of consumers that includes measurable goals and objectives, in consultation with the Financial Literacy and Education Commission. *See* 12 USC 5493(d)(2).
- Coordinating with other units within the Bureau in carrying out its functions, including working with the Community Affairs Office to implement the strategy to improve financial literacy of consumers; and working with the research unit established by the Director to conduct research related to consumer financial education and counseling. *See* 12 USC 5493(d)(3).
- Submitting a report on its financial literacy activities and strategy to improve financial literacy of consumers *See* 12 USC 5493(d)(4).

The current headcount for this area is 12.

### **Office of Consumer Response**

12 USC 5493(b)(3)(A) requires the Director to “establish a unit whose functions shall include establishing a single, toll-free telephone number, a website, and a database ... to facilitate the centralized collection of, monitoring of, and response to consumer complaints regarding consumer financial products and or services.” 12 USC 5534(a) requires the CFPB “to provide a timely response to consumers, in writing where appropriate, to complaints against, or inquiries concerning, a covered person.” 15 USC 1681i(e) establishes a process by which the CFPB must act and report out on certain credit and consumer reporting complaints. Consumer Response must coordinate with certain CFPB offices and personnel, including the Private Student Loan Ombudsman and Office of Servicemember Affairs. *See* 12 USC 5493(e), 12 USC 5535.

Consumer Response has several competitive areas:

#### ***Consumer Resource Center***

12 USC 5493(b)(3)(A) directs the CFPB to create establish a single, toll-free number. This team manages a Consumer Resource Center (CRC), which receives more than 40,000 calls per month. The CRC answers consumers’ inquiries, accepts and provides status updates on complaints, and directs consumers resources such as state and local services.

The current headcount for this area is 3.

#### ***Complaint Handling***

12 USC 5534(a) requires the CFPB to timely respond to consumers, including any responses received by the regulator from the covered person. This team directs the complaints to companies for a response.

The current headcount for this area is 7.

***Portal Operations***

12 USC 5534(b) requires certain covered persons to provide a timely response to the regulator. This team is responsible for responding to stakeholder support tickets, including tickets submitted by company, congressional, and government portal users.

The current headcount for this area is 7.

***Mosaic Program***

12 USC 5493(b)(3)(A) directs the CFPB to create establish a database to facilitate the centralized collection of complaints. 12 USC 5493(b)(3)(D) requires the CFPB to share consumer complaint information with prudential regulators, the Federal Trade Commission, other Federal agencies, and State agencies. This team manages the technology that facilitates the handling of more than 350,000 complaints per month

The current headcount for this area is 5.

***Investigations (Regulatory Compliance, Complaint Monitoring, Research and Analysis, Escalation Case Management)***

12 USC 5511(c)(2) requires the CFPB to “investigate” complaints. Additionally, 12 USC 5493(b)(3)(A) requires the CFPB to “monitor” complaints. This team is responsible for monitoring and investigating the more than three million complaints the CFPB receives annually. This team conducts investigative inquiries received by the Director’s Office. This team also conducts analyses that support the Chief of Staff’s team efforts to meet the publication of statutory reports and supports rule lookback assessments as required by 12 USC 5512.

The current headcount for this area is 30.

***Data Reporting***

12 USC 5493(e) and 12 USC 5535 requires Consumer Response to coordinate with the Office of Servicemember Affairs and the Private Student Loan Ombudsman, respectively. This team is responsible for working with these offices for their complaint monitoring work.

The current headcount for this area is 4.

***Stakeholder Engagement***

12 USC 5493(b)(3)(A) directs the CFPB to “coordinate with the Federal Trade Commission or other Federal agencies to route complaints to such agencies, where appropriate.” Additionally, 12 USC 5493(b)(3)(D) requires the CFPB to “share consumer complaint information with prudential regulators, the Federal Trade Commission, other Federal agencies, and State agencies ...”. This team is responsible for working with federal and state agencies, including state Attorneys General.

The current headcount for this area is 5.

### ***Chief of Staff Team***

Consumer Response is responsible for publishing or contributing to the publication of several reports. Those reports include:

- Consumer Response Annual Report (as required by 12 USC 5493(b)(3)(D))
- Fair Credit Reporting Act 611(e) Report (as required by 15 USC 1681i(e)(5))
- Fair Debt Collection Practices Act Report (as required by 15 USC 1692m)
- CFPB Semi-Annual Reports (required by 12 USC 5496)

This team is responsible for the production and publication of these reports, including any follow-up questions from oversight bodies.

The current headcount for this area is 5.

### **Management and Operations**

This team provided the executive direction for both offices within the division. The current divisional executives each have a dual role both division and office level executives. The office level executive positions remain vacant. The team also provides centralized support to each office regarding resource management functions including budget, acquisition management, training, management reporting, and coordination with internal and external stakeholders, and oversight bodies such as GAO and OIG.

The current headcount for this area is 5.

**From:** Paoletta, Mark (CFPB) [REDACTED] >  
**Sent:** Thursday, February 27, 2025 12:07 PM  
**To:** Vespa-Papaleo, Frank (CFPB)  
**Cc:** Sutton, Jocelyn (CFPB); Miller, Samuel (CFPB); Martinez, Adam (CFPB); Shapiro, Daniel (CFPB)  
**Subject:** RE: Request to Commence Fair Lending Activity

Good afternoon, Frank,

Thanks for email. You are authorized to perform the statutory functions set forth in 12 U.S.C. 5493(c)(2), including the four examples you identified below. Any action or communication to an outside party should be send to me and Daniel Shapiro for review and approval before being transmitted.

Thanks.

Mark

---

**From:** Vespa-Papaleo, Frank (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 11:51 AM  
**To:** Paoletta, Mark (CFPB) [REDACTED] >  
**Cc:** Sutton, Jocelyn (CFPB) [REDACTED]; Miller, Samuel (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Subject:** Request to Commence Fair Lending Activity

Hi Mark,

Acting Director Vought instructed CFPB staff to not perform any work tasks. The email also specified that if there were any urgent matters, staff must alert Acting Director Vought through you and obtain written approval before working on them. **The Office of Fair Lending requests approval to perform the statutory functions expressly identified in 12 U.S. Code § 5493(c)(2).**

These functions include: (A): providing oversight and enforcement of federal laws that ensure the fair, equitable, and nondiscriminatory access to credit for both individuals and communities, including the Equal Credit Opportunity Act and the Home Mortgage Disclosure Act; (B) coordinating the fair lending efforts of the Bureau with other federal agencies and state regulators; (C) working with private industry, fair lending, civil rights, consumer and community advocates on the promotion of fair lending compliance and education; and (D) providing annual reports to Congress on the efforts of the Bureau to fulfill its fair lending mandate.

As a result, I hereby request authorization to re-commence work consistent with these statutory provisions. Some examples of pending work include: (1) supporting fair lending examinations and enforcement activity and research related to access to credit; (2) coordinating HMDA compliance efforts with the FFIEC’s HMDA Subcommittee; (3) responding to previously-received requests to participate in educational programming with private industry and other advocates; and (4) completing the drafting of the 2024 Annual Report to Congress.

Thank you for your consideration; please advise if you need anything else from me regarding this request.

J. FRANK VESPA-PAPALEO  
Assistant Director, Office of Fair Lending



1700 G Street, NW  
Washington, DC 20552  
Mobile: [REDACTED]

Consumer Financial Protection Bureau  
[consumerfinance.gov](https://consumerfinance.gov)

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**From:** [Paoletta, Mark \(CFPB\)](#)  
**To:** [Martin, Angela \(CFPB\)](#)  
**Cc:** [Martinez, Adam \(CFPB\)](#); [Petersen, Cara \(CFPB\)](#); [Rice, Jim \(CFPB\)](#); [Liu, Wen \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: (Responding to military requests) FW: Additional Directives on Bureau Activities  
**Date:** Thursday, February 27, 2025 12:14:49 PM

---

Hello, Angela,

Thanks for email. You are authorized and directed: to attend the March 6<sup>th</sup> meeting; to attend the March 15 meeting in Houston; to provide virtual training on the MLA on March 27; to accept other requests for virtual training from Army JAG School, Naval Justice School, and USAF Legal Assistance Division; and to reply to any email query from the JAG field.

Thanks.

Mark

---

**From:** Martin, Angela (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 11:38 AM  
**To:** Paoletta, Mark (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]; Petersen, Cara (CFPB) [REDACTED]; Rice, Jim (CFPB) [REDACTED]; Liu, Wen (CFPB) [REDACTED]  
**Subject:** (Responding to military requests) FW: Additional Directives on Bureau Activities

Dear Mr. Paoletta (cc Mr. Martinez/Ms. Peterson for situational awareness and Mr. Jim Rice and Mr. Wen Liu in OSA),

I've written previously on other issues, please do not take this email as insubordination.

I request permission to perform the following urgent work tasks. I don't want to leave others, particularly military attorneys, in abeyance while awaiting a response from me. I also make this request so external stakeholders will know to clear their calendars or find a substitution.

1. Send immediate notice of cancellation of next Thursday's (**March 6**) CFPB Military Legal Assistance Working Group Meeting. External members include DOD/DHS Military Legal Assistance Service Chiefs, DOJ Civil Division SCRA team, DOJ Consumer Protection Branch, JAG school professors, Service field representatives, and military legal assistance field offices.
2. Send immediate notice to the National Guard Bureau that I will not be presenting at the 2025 National Guard All States Legal Update in Houston (**March 15**). They have sent repeated requests for materials. They should also be informed to remove the Bureau block of instruction from their schedule.
3. Send immediate notice that I will not provide virtual training on the MLA in support of the Navy's Personal Financial Manager Townhall (**March 27**).
4. Reply to any other requests for virtual training with a decline of the same (currently pending:

Army JAG School, Naval Justice School, and USAF Legal Assistance Division).

5. Reply to any email queries from the JAG field. Note: I request permission to respond substantively but if you decline to grant that request, then at least respond that I won't be responding and suggest the military attorneys file a consumer complaint. I have pending queries from multiple locations.

For your reference, I've attached a copy of the Joint Statement of Principles (JSOP) which overlaps to some extent with OSA's statutory mission. I serve as Enforcement's single point of contact in providing technical guidance on military consumer law and Bureau resources to military legal staff worldwide. The request for guidance generally comes via email from the JAG field. The JSOP also established a Military Legal Assistance Working Group "with the goal of achieving a coordinated response to unlawful conduct targeted at servicemembers and their families" which meets quarterly. Lastly, the JSOP set up an avenue for the Bureau (OSA and ENF) to have training and outreach opportunities with the JAG community, especially the JAG schools. Mr. Liu and I train military lawyers and legal staff on Bureau resources, including OSA, the mechanics of submitting consumer complaints, and military consumer law basics, with an emphasis on the MLA. We have recurring engagements.

I thank you in advance for considering this request to continue to serve those who serve our country.

Respectfully,  
Angela

**Angela Martin**

Senior Enforcement Attorney/Military Affairs Liaison | Enforcement Division

*Typical availability: 0600-0730; 1000-1430; 1600-1900 (Eastern time zone) with accommodation possible for all time zones*

Consumer Financial Protection Bureau

Mobile: [REDACTED]

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**From:** Vought, Russell <[REDACTED]>  
**Sent:** Monday, February 10, 2025 8:30 AM  
**To:** \_DL\_CFPB\_AllHands [REDACTED]  
**Subject:** Additional Directives on Bureau Activities

Good morning, CFPB staff,

As you have been informed by the Chief Operating Officer in an email yesterday, the Bureau's DC headquarters building is closed this week. Employees should not come into the office. Please do not perform any work tasks. If there are any urgent matters, please alert me through Mark Paoletta, Chief Legal Officer, to get approval in writing before performing any work task. His email is [REDACTED]. Otherwise, employees should stand down from performing any work task. Thank you for your attention on this matter.

Best,

Russ Vought

Acting Director

Bureau of Consumer Financial Protection

**From:** [Vespa-Papaleo, Frank \(CFPB\)](#)  
**To:** [Paoletta, Mark \(CFPB\)](#)  
**Cc:** [Sutton, Jocelyn \(CFPB\)](#); [Miller, Samuel \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** Re: Request to Commence Fair Lending Activity  
**Date:** Thursday, February 27, 2025 12:21:28 PM

---

Understood. Thanks for your prompt response.

---

**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 12:07:12 PM  
**To:** Vespa-Papaleo, Frank (CFPB) [REDACTED]  
**Cc:** Sutton, Jocelyn (CFPB) [REDACTED] >; Miller, Samuel (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED] >; Shapiro, Daniel (CFPB) [REDACTED]  
**Subject:** RE: Request to Commence Fair Lending Activity

Good afternoon, Frank,

Thanks for email. You are authorized to perform the statutory functions set forth in 12 U.S.C. 5493(c) (2), including the four examples you identified below. Any action or communication to an outside party should be send to me and Daniel Shapiro for review and approval before being transmitted.

Thanks.

Mark

---

**From:** Vespa-Papaleo, Frank (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 11:51 AM  
**To:** Paoletta, Mark (CFPB) [REDACTED]  
**Cc:** Sutton, Jocelyn (CFPB) [REDACTED] Miller, Samuel (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Subject:** Request to Commence Fair Lending Activity

Hi Mark,

Acting Director Vought instructed CFPB staff to not perform any work tasks. The email also specified that if there were any urgent matters, staff must alert Acting Director Vought through you and obtain written approval before working on them. **The Office of Fair Lending requests approval to perform the statutory functions expressly identified in 12 U.S. Code § 5493(c)(2).**

These functions include: (A): providing oversight and enforcement of federal laws that ensure the fair, equitable, and nondiscriminatory access to credit for both individuals and communities, including the Equal Credit Opportunity Act and the Home Mortgage Disclosure Act; (B) coordinating the fair lending efforts of the Bureau with other federal agencies and state regulators; (C) working with private industry, fair lending, civil rights, consumer and community advocates on the promotion of fair lending compliance and education; and (D) providing annual reports to Congress on the efforts of the Bureau to fulfill its fair lending

mandate.

As a result, I hereby request authorization to re-commence work consistent with these statutory provisions. Some examples of pending work include: (1) supporting fair lending examinations and enforcement activity and research related to access to credit; (2) coordinating HMDA compliance efforts with the FFIEC's HMDA Subcommittee; (3) responding to previously-received requests to participate in educational programming with private industry and other advocates; and (4) completing the drafting of the 2024 Annual Report to Congress.

Thank you for your consideration; please advise if you need anything else from me regarding this request.

J. FRANK VESPA-PAPALEO  
Assistant Director, Office of Fair Lending  
1700 G Street, NW  
Washington, DC 20552  
Mobile: [REDACTED]

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**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Michalosky, Martin \(CFPB\)](#)  
**Cc:** [Adams, Danielle \(CFPB\)](#); [Nguyen, Hoan \(CFPB\)](#)  
**Subject:** RE: Processing FOIA and Privacy Act Requests  
**Date:** Thursday, February 27, 2025 1:29:00 PM

---

Hi Marty. Approved to move forward. Thank you!

Adam

Adam Martinez  
Chief Operating Officer

---

**From:** Michalosky, Martin (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 1:29 PM  
**To:** Martinez, Adam (CFPB) [REDACTED] >  
**Cc:** Adams, Danielle (CFPB) [REDACTED]; Nguyen, Hoan (CFPB) [REDACTED] v>  
**Subject:** Processing FOIA and Privacy Act Requests  
**Importance:** High

Hi Adam,

The FOIA statute (5 U.S.C. § 552) requires agencies to process requests for records from the public. FOIA has a specific timeframe (20 working days) for federal agencies, including the CFPB, to respond to requests. There is a risk of litigation for agencies that are not able to respond in this timeframe, which excludes federal holidays. Additionally, the Privacy Act provides the public to request records about them. The FOIA team processes both FOIA and Privacy Act requests, and responds to inquires related to those requests.

I recommend that the FOIA team be able to continue their work processing FOIA and Privacy Act requests.

Thanks,  
Marty

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Russell, Jessica \(CFPB\)](#); [Pham, Danny \(CFPB\)](#)  
**Cc:** [Spry, Eric \(CFPB\)](#); [Liu, Feng \(CFPB\)](#); [Brown, Jason \(CFPB\)](#); [Pappalardo, Janis \(CFPB\)](#)  
**Subject:** RE: Requests to approve HMDA data access  
**Date:** Thursday, February 27, 2025 3:55:00 PM

---

Hi Jessica – Good afternoon!

Jason's Team has authority to execute our HMDA legal and statutory authority/legal requirements.

Thank you.

Adam

Adam Martinez  
Chief Operating Officer

---

**From:** Russell, Jessica (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 3:10 PM  
**To:** Pham, Danny (CFPB) [REDACTED]; Martinez, Adam (CFPB)  
[REDACTED]  
**Cc:** Spry, Eric (CFPB) [REDACTED]; Liu, Feng (CFPB) [REDACTED]  
**Subject:** RE: Requests to approve HMDA data access

Ok, I will just leave them in the system until I have authorization to reject them.

Thanks,  
Jessica

---

**From:** Pham, Danny (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 3:03 PM  
**To:** Russell, Jessica (CFPB) [REDACTED]; Martinez, Adam (CFPB)  
[REDACTED]  
**Cc:** Spry, Eric (CFPB) [REDACTED]; Liu, Feng (CFPB) [REDACTED]  
**Subject:** RE: Requests to approve HMDA data access

Hi Jessica,

Is my fault on clicking the wrong one when I was working with ICAM team to make sure SailPoint auto configure the user profile. So just reject the request .

Thank you,  
Danny

---

**From:** Russell, Jessica (CFPB) [REDACTED]



**Sent:** Thursday, February 27, 2025 3:02 PM

**To:** Martinez, Adam (CFPB) [REDACTED]; Pham, Danny (CFPB)

**Cc:** Spry, Eric (CFPB) [REDACTED]; Liu, Feng (CFPB) [REDACTED]

**Subject:** Requests to approve HMDA data access

Hi Adam,

I am the data steward for the HMDA datasets, which means that I review requests for access to the HMDA data. Danny Pham submitted several requests on behalf of others. Do I have authorization to work on this?

[@Pham, Danny \(CFPB\)](#) – Could you provide justifications for these access requests?

Thanks,  
Jessica

**Jessica Russell**  
Mortgage Markets  
Tel: [REDACTED]  
Mob: [REDACTED]  
[consumerfinance.gov](https://consumerfinance.gov)

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**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Pappalardo, Janis \(CFPB\)](#); [Sokolov, Dan \(CFPB\)](#); [Epstein, Ann \(CFPB\)](#); [Hedgespeth, Grady \(CFPB\)](#); [Brown, Jason \(CFPB\)](#); [McArdle, Mark \(CFPB\)](#); [McNamara, John \(CFPB\)](#); [Brown, Desmond \(CFPB\)](#); [Cole, Lisa \(CFPB\)](#); [Royster, Deborah \(CFPB\)](#); [Rice, Jim \(CFPB\)](#); [Dodd-Ramirez, Daniel \(CFPB\)](#)  
**Bcc:** [Paoletta, Mark \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** Statutory/Legal Required Work  
**Date:** Thursday, February 27, 2025 4:18:00 PM  
**Attachments:** [Directives on Bureau Activities.msg](#)

---

Hi RMR Colleagues – Good afternoon.

Thank you for your patience as we continue through transition and our new leadership's review of the Bureau.

On February 8 (email attached), our Acting Director outlined several areas where work stoppage was being implemented at the Bureau. He did exclude areas approved by him or required by law. We want to ensure that you are aware that statutorily required work and/or work required by law are authorized.

Your teams are authorized to continue carrying out these responsibilities. Any actions or communications with outside parties must be sent to Mark Paoletta, Chief Legal Officer and Daniel Shapiro, Deputy Chief Legal Officer.

Should you have any questions at all, please feel free to contact our Chief Legal Officer as directed by the Acting Director. Alternatively, you are always welcome to reach out to me if needed. I am happy to share guidance provided to other leaders and employees regarding authorized work, including my own team.

Thank you for your support.

Adam

Adam Martinez  
Chief Operating Officer

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Warren, LaShaun \(CFPB\)](#)  
**Bcc:** [Paoletta, Mark \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** Statutory/Legal Required Work  
**Date:** Thursday, February 27, 2025 4:47:00 PM  
**Attachments:** [Directives on Bureau Activities.msg](#)

---

Hi LaShaun – Good afternoon.

Thank you for your patience as we continue through transition and our new leadership's review of the Bureau.

On February 8 (email attached), our Acting Director outlined several areas where work stoppage was being implemented at the Bureau including work conducted by External Affairs. He did exclude areas approved by him or required by law including statutory requirements.

We want to ensure that you are aware that you may reach out to Mark Paoletta, Chief Legal Officer with any questions regarding required reports or products you believe should continue at this time. Any actions or communications with outside parties must be sent to Mark and Daniel Shapiro, Deputy Chief Legal Officer.

Should you have any questions at all, please feel free to contact our Chief Legal Officer as directed by the Acting Director. Alternatively, you are always welcome to reach out to me if needed. I am happy to share guidance provided to other leaders and employees regarding authorized work, including my own team.

Thank you for your support.

Adam

Adam Martinez  
Chief Operating Officer

**From:** [Chilbert, Christopher \(CFPB\)](#)  
**To:** [Gelfond, Rebecca \(CFPB\)](#)  
**Cc:** [Martinez, Adam \(CFPB\)](#)  
**Subject:** RE: CFPB Data / Record Analysis and Return  
**Date:** Thursday, February 27, 2025 6:03:33 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Hi Rebecca,

Yes, retrieving Bureau data and records from contractors in accordance with the terms and conditions of the contracts is authorized work. We need to ensure that it is preserved.

Chris Chilbert  
[REDACTED]

---

**From:** Gelfond, Rebecca (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 5:54 PM  
**To:** Chilbert, Christopher (CFPB) [REDACTED]  
**Subject:** FW: CFPB Data / Record Analysis and Return

Hi Chris,

Tiina suggested I check with you. Can you please confirm this is authorized work?

Thanks!  
Rebecca

CFPB Enforcement Chief of Staff

Office: [REDACTED] | [REDACTED]

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---

**From:** Gelfond, Rebecca (CFPB)  
**Sent:** Thursday, February 27, 2025 5:43 PM  
**To:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Cc:** Malik, Irfan (CFPB) [REDACTED]; Lazier, Raynell (CFPB) [REDACTED]  
**Subject:** RE: CFPB Data / Record Analysis and Return

Hi Tiina,

Thanks for the email. Can you please confirm that the Acting Director has authorized this work?

Thanks!  
Rebecca

CFPB Enforcement Chief of Staff

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---

**From:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 5:41 PM  
**To:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Cc:** Malik, Irfan (CFPB) [REDACTED]; Lazier, Raynell (CFPB) [REDACTED]  
**Subject:** CFPB Data / Record Analysis and Return  
**Importance:** High

Dear Business, System, Service, or Application Owner,

Please work with your CORs/PoCs to identify if CFPB data or records are at risk of being deleted due to contract cancellations, memorandum/agreement terminations, or other causes. Please note that per the CFPB standard cybersecurity clause language and CFPB Policy, all CFPB data must be returned at the end of a contract/agreement. Any deviations must be signed off by the Authorizing Official.

If you need T&I assistance to store the returned CFPB data/records, please reach out to me. I will help you find the a secure storage solution.

Please let me know if you have any questions. I am on Teams.

**Dr. Tiina K.O. Rodrigue** ([hear pronunciation here](#))

CISSP, PMP, Compliance Mapper,  
CEA, CSM, ITIL, A+, FAC P/PM III, Female  
ADKAR Change Management Practitioner

Chief Information Security Officer – CISO  
Cyberstar: Level 5



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Become a **Cyberstar**. For more information, see

[https://team.cfpb.local/wiki/index.php/CFPB\\_Phishing\\_Awareness](https://team.cfpb.local/wiki/index.php/CFPB_Phishing_Awareness)

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Gueye, Jafnar \(CFPB\)](#); [Brand, Melissa \(CFPB\)](#); [Galicki, Joshua \(CFPB\)](#)  
**Cc:** [Grant, Lori \(CFPB\)](#)  
**Bcc:** [Paoletta, Mark \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: CFPB Data / Record Analysis and Return  
**Date:** Friday, February 28, 2025 8:54:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

(bcc: Mark Paoletta and Daniel Shapiro for situational awareness)

Good morning.

I would advise that we should reinstate the ETK contract if it is still available in the short term. ETK will help us prevent further litigation and/or settlements as a result of the data base being down. The system is the database and workstream for:

EEO Cases  
Reasonable Accommodation Cases  
Anti-Harassment/Bullying Cases

These are all required to be processed by law. However, long term I would encourage OCR, OHC, and OMWI to work with T&I on an alternative secured solution going forward such as SharePoint or something similar to store data and process complaints.

Adam Martinez  
Chief Operating Officer

---

**From:** Gueye, Jafnar (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 8:30 AM  
**To:** Brand, Melissa (CFPB) [REDACTED]; Galicki, Joshua (CFPB) [REDACTED]  
>  
**Cc:** Grant, Lori (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Subject:** RE: CFPB Data / Record Analysis and Return

Good morning Melissa,

I defer to Adam but I would recommend reaching out to Mark Paoletta. We've frozen all termination actions on contracts until next week and we're working on getting an answer for the actual contract.

Respectfully,

Jafnar

---

**From:** Brand, Melissa (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 8:19 AM  
**To:** Gueye, Jafnar (CFPB) [REDACTED]; Galicki, Joshua (CFPB) [REDACTED]

**Cc:** Grant, Lori (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]

**Subject:** RE: CFPB Data / Record Analysis and Return

**Importance:** High

Good morning Jafnar and Josh.

Cyber told me to have my CORs identify if CFPB data or records are at risk of being deleted due to contract cancellations. I highlighted to Vanessa our inability to access EEO complaints data in ETK, who advised me to reach out to those above me regarding contracts that I need to have active again. Since I report directly to the Director, I was wondering who you suggest I reach out to? Is there a main POC that you have been collaborating with that I should reach out to? Or is this something that is already being worked on and me reaching out is not necessary?

Thank you.

Melissa

---

**From:** Del Toro, Vanessa (CFPB) [REDACTED]

**Sent:** Friday, February 28, 2025 8:12 AM

**To:** Brand, Melissa (CFPB) [REDACTED]

**Cc:** Grant, Lori (CFPB) [REDACTED]; Stroud, Renita (CFPB) [REDACTED]

Villano, Michael (CFPB) [REDACTED]

**Subject:** RE: CFPB Data / Record Analysis and Return

Hi Melissa,

Adding Mike Villano who is the contracting officer for the Entellitrak contract. That contract, 9531CB23F0046, was on the list we were directed to terminate.

We stopped doing the modification to terminate and have mostly sent out the stop work/ termination notices. If you need this one to be active again, please reach out to those above you. Some vendors that were asked to "turn back on" operations were able to, others cannot be back on so easily. And as we stopped work and sent the termination notice as directed by those above us, this also means that the vendor does not have to necessarily comply with the request to continue to provide services they were previously told were terminated.

Sorry, it is a bit of a mess, but we can only do what directed to. If you need this, please reach out to leadership above you so that we in Procurement can get different direction.

Thanks,

*Vanessa del Toro*



Contracting Officer | Office of Finance and Procurement

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---

**From:** Brand, Melissa (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 7:18 AM  
**To:** Del Toro, Vanessa (CFPB) [REDACTED]  
**Cc:** Grant, Lori (CFPB) [REDACTED]; Stroud, Renita (CFPB) [REDACTED]  
**Subject:** FW: CFPB Data / Record Analysis and Return  
**Importance:** High

Hi Vanessa. Renita works with Ludy on the ETK contract, however Renita is out today and I am not sure of Ludy's work status. I am hoping you can help.

I want to make sure that we are flagging that Entellitrak is our system of record for EEO cases, and we cannot do our work without it. We are struggling right now with our current and past cases without access to this data in the ETK system, and we will not be able to run statutorily required reports without it. We definitely need the data that was put into ETK – but beyond that, we really *need* ETK to make use of the data.

Thank you,

Melissa

---

**From:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 5:41 PM  
**To:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Cc:** Malik, Irfan (CFPB) [REDACTED]; Lazier, Raynell (CFPB) [REDACTED]  
**Subject:** CFPB Data / Record Analysis and Return  
**Importance:** High

Dear Business, System, Service, or Application Owner,

Please work with your CORs/PoCs to identify if CFPB data or records are at risk of being deleted due to contract cancellations, memorandum/agreement terminations, or other causes. Please note that per the CFPB standard cybersecurity clause language and CFPB Policy, all CFPB data must be returned at the end of a

contract/agreement. Any deviations must be signed off by the Authorizing Official.

If you need T&I assistance to store the returned CFPB data/records, please reach out to me. I will help you find the a secure storage solution.

Please let me know if you have any questions. I am on Teams.

**Dr. Tiina K.O. Rodrigue** ([hear pronunciation here](#))

CISSP, PMP, Compliance Mapper,  
CEA, CSM, ITIL, A+, FAC P/PM III, Female  
ADKAR Change Management Practitioner

Chief Information Security Officer – CISO

Cyberstar: Level 5



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Become a **Cyberstar**. For more information, see [https://team.cfpb.local/wiki/index.php/CFPB\\_Phishing\\_Awareness](https://team.cfpb.local/wiki/index.php/CFPB_Phishing_Awareness)

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Pappalardo, Janis \(CFPB\)](#)  
**Subject:** RE: Guidance . . .  
**Date:** Friday, February 28, 2025 10:20:00 AM

---

Hi Jan. That is correct.

If there are any mission/statutory concerns, you may always reach out to Mark for guidance as well. But you the management responsibilities are all good.

Let me know if I can help in any way.

Adam

Adam Martinez  
Chief Operating Officer

---

**From:** Pappalardo, Janis (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 10:18 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Subject:** Guidance . . .

Hi Adam,

I hope you are well!

In light of your e-mail and discussion yesterday, my understanding is that we can resume all regular work related to fulfilling statutory obligations, including regular management activities. Is that correct?

With appreciation,  
Jan

--

Janis K. Pappalardo  
Deputy Associate Director and Acting Associate Director  
Research, Monitoring, and Regulations  
Mobile: [REDACTED]

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CFPB\_00044



**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Chilbert, Christopher \(CFPB\)](#); [Gelfond, Rebecca \(CFPB\)](#)  
**Subject:** RE: CFPB Data / Record Analysis and Return  
**Date:** Friday, February 28, 2025 12:48:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

That is my understanding as well.

Adam Martinez  
Chief Operating Officer

---

**From:** Chilbert, Christopher (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 12:39 PM  
**To:** Gelfond, Rebecca (CFPB) [REDACTED]; Martinez, Adam (CFPB)  
[REDACTED]  
**Subject:** RE: CFPB Data / Record Analysis and Return

My understanding is that he has authorized us to retain federal records and perform contract close-out activities for contracts that have been terminated.

Chris Chilbert  
[REDACTED]

---

**From:** Gelfond, Rebecca (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 12:32 PM  
**To:** Chilbert, Christopher (CFPB) [REDACTED]; Martinez, Adam (CFPB)  
[REDACTED]  
**Subject:** RE: CFPB Data / Record Analysis and Return

Hi Chris and Adam.

Has the Acting Director or Mark P specifically authorized this work?

Thanks!  
Rebecca

CFPB Enforcement Chief of Staff

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**From:** Chilbert, Christopher (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 6:04 PM  
**To:** Gelfond, Rebecca (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]

**Subject:** RE: CFPB Data / Record Analysis and Return

Hi Rebecca,

Yes, retrieving Bureau data and records from contractors in accordance with the terms and conditions of the contracts is authorized work. We need to ensure that it is preserved.

Chris Chilbert  
[REDACTED]

---

**From:** Gelfond, Rebecca (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 5:54 PM  
**To:** Chilbert, Christopher (CFPB) [REDACTED]  
**Subject:** FW: CFPB Data / Record Analysis and Return

Hi Chris,

Tiina suggested I check with you. Can you please confirm this is authorized work?

Thanks!  
Rebecca

CFPB Enforcement Chief of Staff

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**From:** Gelfond, Rebecca (CFPB)  
**Sent:** Thursday, February 27, 2025 5:43 PM  
**To:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Cc:** Malik, Irfan (CFPB) [REDACTED]; Lazier, Raynell (CFPB) [REDACTED]  
**Subject:** RE: CFPB Data / Record Analysis and Return

Hi Tiina,

Thanks for the email. Can you please confirm that the Acting Director has authorized this work?

Thanks!  
Rebecca

CFPB Enforcement Chief of Staff

Office: [REDACTED] | Mobile: [REDACTED]

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**From:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 5:41 PM  
**To:** Rodrigue, Tiina (CFPB) [REDACTED]  
**Cc:** Malik, Irfan (CFPB) [REDACTED]; Lazier, Raynell (CFPB) [REDACTED]  
**Subject:** CFPB Data / Record Analysis and Return  
**Importance:** High

Dear Business, System, Service, or Application Owner,

Please work with your CORs/PoCs to identify if CFPB data or records are at risk of being deleted due to contract cancellations, memorandum/agreement terminations, or other causes. Please note that per the CFPB standard cybersecurity clause language and CFPB Policy, all CFPB data must be returned at the end of a contract/agreement. Any deviations must be signed off by the Authorizing Official.

If you need T&I assistance to store the returned CFPB data/records, please reach out to me. I will help you find the a secure storage solution.

Please let me know if you have any questions. I am on Teams.

**Dr. Tiina K.O. Rodrigue** ([hear pronunciation here](#))

CISSP, PMP, Compliance Mapper,  
CEA, CSM, ITIL, A+, FAC P/PM III, Female  
ADKAR Change Management Practitioner

Chief Information Security Officer – CISO  
Cyberstar: Level 5



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**From:** Hagins, Calvin (CFPB) [REDACTED] >  
**Sent:** Friday, February 28, 2025 1:19 PM  
**To:** Huggins, Cassandra (CFPB); Martinez, Adam (CFPB)  
**Cc:** Hagins, Calvin (CFPB)  
**Subject:** RE: Statutory/Legal Required Work

Adam:

Thanks for the confirmation.

Casey:

I have not changed by thinking about NOT starting/continuing any “supervision” work (i. e. examination related activities).

Calvin R. Hagins  
Principal Deputy Assistant Director for the Office of Supervision Examinations

**Supervision (SUP)**  
**Office of Supervision Examinations (OSE)**

**Office Location: Office Primary – Monday – Friday**  
**Room: 3036**

**Office:** [REDACTED]  
**Mobile:** [REDACTED]



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**From:** Huggins, Cassandra (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 11:09 AM  
**To:** Martinez, Adam (CFPB) [REDACTED] Hagins, Calvin (CFPB) [REDACTED]  
**Subject:** Re: Statutory/Legal Required Work

This is all very helpful, thanks Adam. Much appreciated.

---

**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 10:58:08 AM

**To:** Huggins, Cassandra (CFPB) [REDACTED]; Hagins, Calvin (CFPB) [REDACTED]  
**Subject:** RE: Statutory/Legal Required Work

That is correct. If there are any reports to congress per statute or anything like that, I'd recommend reaching out to Mark. Other divisions are raising questions about reports or other statutory requirements. I'm personally trying to be helpful to just ensure people know they can ask questions or seek clarification, even it's just on operational issues.

Thank you, Casey.

Adam Martinez  
Chief Operating Officer

---

**From:** Huggins, Cassandra (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 10:33 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]; Hagins, Calvin (CFPB) [REDACTED]  
**Subject:** RE: Statutory/Legal Required Work

Adam,

To be clear, the Feb. 8 email directed us to cease all supervision and examination activity. Am I correct that directive still stands?

Thanks,  
Casey

Cassandra Huggins  
Principal Deputy Assistant Director | Supervision Policy & Operations  
Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 4:35 PM  
**To:** Huggins, Cassandra (CFPB) [REDACTED]; Hagins, Calvin (CFPB) [REDACTED]  
**Subject:** Statutory/Legal Required Work

Hi Casey and Calvin – Good afternoon.

Thank you for your patience as we continue through transition and our new leadership's review of the Bureau.

On February 8 (email attached), our Acting Director outlined several areas where work stoppage was being implemented at the Bureau including specific work conducted by Supervision. He did exclude areas approved by him or required by law including statutory requirements.

We want to ensure that you are aware that you may reach out to Mark Paoletta, Chief Legal Officer with any questions regarding required reports or products you believe should continue at this time. Any actions or communications with outside parties must be sent to Mark and Daniel Shapiro, Deputy Chief Legal Officer.

Should you have any questions at all, please feel free to contact our Chief Legal Officer as directed by the Acting Director. Alternatively, you are always welcome to reach out to me if needed. I am happy to share guidance provided to other leaders and employees regarding authorized work, including my own team.

Thank you for your support.

Adam

Adam Martinez  
Chief Operating Officer

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Herndon, Michael \(CFPB\)](#)  
**Subject:** RE: Statutory/Legal Required Work  
**Date:** Friday, February 28, 2025 3:20:00 PM

---

Hi Michael – you are authorized to coordinate with your leadership or management on work matters. Thank you.

Adam Martinez  
Chief Operating Officer

---

**From:** Herndon, Michael (CFPB) [REDACTED]  
**Sent:** Friday, February 28, 2025 2:49 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Subject:** Fw: Statutory/Legal Required Work

Dear Adam Martinez,

I have been, based upon the email chain below, asked to attend a meeting on Monday to discuss the rollout of this guidance.

Can you confirm I am authorized to perform the work task of attending this meeting.

If so, I will need further guidance on what work status to enter into a timesheet.

Regards,

Michael

.

---

**From:** Pappalardo, Janis (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 5:35 PM  
**To:** Sokolov, Dan (CFPB) [REDACTED]; Epstein, Ann (CFPB) [REDACTED]; Hedgespeth, Grady (CFPB) [REDACTED]; Brown, Jason (CFPB) [REDACTED]; McArdle, Mark (CFPB) [REDACTED]; McNamara, John (CFPB) [REDACTED]; Brown, Desmond (CFPB) [REDACTED]; Cole, Lisa (CFPB) [REDACTED]; Royster, Deborah (CFPB) [REDACTED]; Rice, Jim (CFPB) [REDACTED]; Dodd-Ramirez, Daniel (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]  
**Subject:** RE: Statutory/Legal Required Work

Greetings, All!

I just talked to Adam (cc'd) and thanked him for this clarification (thanks Adam!).

Adam confirmed that you are free to cascade his email with your managers, and managers are free to cascade to their staff. I think this cascade approach makes sense.

I imagine that there will be many questions as this guidance gets rolled out. Please keep track of questions and share them. I will work with you and RMRFO to summarize issues to seek coordinated additional clarification from leadership, which we can then share back out.

Of course, if you have an urgent question for leadership, do not wait for me -- ask away. However, please cc me so I understand the flow of issues and responses in RMR.

The idea is to ensure that information flows efficiently, both horizontally and vertically.

Have a nice evening!

With appreciation,  
Jan

--  
Janis K. Pappalardo  
Deputy Associate Director and Acting Associate Director  
Research, Monitoring, and Regulations  
Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Thursday, February 27, 2025 4:18 PM  
**To:** Pappalardo, Janis (CFPB) [REDACTED]; Sokolov, Dan (CFPB) [REDACTED]; Epstein, Ann (CFPB) [REDACTED]; Hedgespeth, Grady (CFPB) [REDACTED]; Brown, Jason (CFPB) [REDACTED]; McArdle, Mark (CFPB) [REDACTED]; McNamara, John (CFPB) [REDACTED]; Brown, Desmond (CFPB) [REDACTED]; Cole, Lisa (CFPB) [REDACTED]; Royster, Deborah (CFPB) [REDACTED]; Rice, Jim (CFPB) [REDACTED]; Dodd-

Ramirez, Daniel (CFPB) [REDACTED]

**Subject:** Statutory/Legal Required Work

Hi RMR Colleagues – Good afternoon.

Thank you for your patience as we continue through transition and our new leadership's review of the Bureau.

On February 8 (email attached), our Acting Director outlined several areas where work stoppage was being implemented at the Bureau. He did exclude areas approved by him or required by law. We want to ensure that you are aware that statutorily required work and/or work required by law are authorized.

Your teams are authorized to continue carrying out these responsibilities. Any actions or communications with outside parties must be sent to Mark Paoletta, Chief Legal Officer and Daniel Shapiro, Deputy Chief Legal Officer.

Should you have any questions at all, please feel free to contact our Chief Legal Officer as directed by the Acting Director. Alternatively, you are always welcome to reach out to me if needed. I am happy to share guidance provided to other leaders and employees regarding authorized work, including my own team.

Thank you for your support.

Adam

Adam Martinez  
Chief Operating Officer

**From:** [Martinez, Adam \(CFPB\)](#)  
**Cc:** [Paoletta, Mark \(CFPB\)](#)  
**Subject:** All Hands Message re: Work Required by Law  
**Date:** Sunday, March 2, 2025 3:33:06 PM

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**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless “required by law” or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB



**From:** [Paoletta, Mark \(CFPB\)](#)  
**To:** [McNamara, John \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#)  
**Cc:** [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Sunday, March 2, 2025 4:10:37 PM

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No objections. Please proceed.

Thank you.

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**From:** McNamara, John (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 4:09 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Unless you have objections, Markets will contact CARD Act 1022 targets to respond to their requests.

We will work on the FDCPA Annual report with a planned delivery date in early to mid-May.

We will conduct statutorily required market monitoring, copying you, Mark and Dan Shapiro on substantive matters but not scheduling and maintenance issues. We also plan to make you both (Dan and Mark) aware of market monitoring meetings.

Thanks in advance for your help.

John McNamara  
Principal Assistant Director, Market  
Division of Research, Monitoring & Regulations

**Consumer Financial Protection Bureau**

1700 G Street NW  
Washington, DC 20552  
Office- [REDACTED]  
Mobile- [REDACTED]

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mistake and delete the e-mail and any attachments. An inadvertent disclosure is not intended to waive any privileges.

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

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Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Paoletta, Mark \(CFPB\)](#)  
**To:** [Warren, LaShaun \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#)  
**Cc:** [DL\\_CFPB\\_EA\\_Mgmt](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: Statutory/Legal Required Work  
**Date:** Sunday, March 2, 2025 5:13:01 PM

---

Good afternoon, LaShaun,

Thanks for reaching out. I will review your request in Number One and get back with you this week. Your requests 2-18 are approved.

Thank you.

Mark

Mark Paoletta  
Chief Legal Officer  
CFPB

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**From:** Warren, LaShaun (CFPB) [REDACTED] >  
**Sent:** Sunday, March 2, 2025 3:41 PM  
**To:** Paoletta, Mark (CFPB) [REDACTED] Martinez, Adam (CFPB)  
[REDACTED]  
**Cc:** \_DL\_CFPB\_EA\_Mgmt [REDACTED]  
**Subject:** RE: Statutory/Legal Required Work

Good afternoon,

As a follow up to Adam's request to identify work areas that should continue at this time, EA is submitting the following. Please note the first item was previously submitted on Thursday, February 27<sup>th</sup> and requires submission by March 14, 2025

1. Pursuant to the Federal Advisory Committee Act (5 U.S.C. § 10), the Consumer Advisory Board's (CAB) charter and Membership Balance Plan (MBP) are required to be updated and submitted to the General Services Administration (GSA) by March 14, 2025. Attached are the draft documents for review and approval. The approval should be from CFPB's Director and Chief Legal Officer prior to submitting to the General Services Administration's Committee Management Secretariat, the CFPB's House and Senate authorizing committees, and the Librarian of Congress by March 14th. The CFPB must also issue a Federal Register notice and post the two documents on the CFPB's public website as part of satisfying this obligation. Kimberley Medrano is CFPB's Committee Management Officer for the CAB and will liaise with GSA. Once

- the attached documents have been approved, EA requests approval for Kimberley Medrano, Patrick O'Brien and LaShaun Warren to complete this request.
2. The Digital Communications team has identified CFPB data and records that are at risk of being deleted due to the contract termination. EA requests approval for Liane Fiano (Staff Director, Digital Communications) to work with Cybersecurity, Procurement and Finance to restore CFPB's social media records and ensure compliance to the records retention requirements [44 U.S.C. §3301]
  3. External Affairs seeks approval to monitor EA mailboxes for official correspondence from stakeholders, including letters to the Acting Director, petitions, and meeting requests; acknowledge receipt of official correspondence from stakeholders; and to draft CFPB updates to the Acting Director summarizing requests and proposed response. [12 U.S.C. § 5493(f)(3), 12 U.S.C. § 5493(c)(2), 12 U.S.C. § 5493(d)(2), 12 U.S.C. § 5493(e)(1), and 12 U.S.C. §5493(e)]. This will also allow us to ensure that any emails that should be construed as FOIA requests are properly handled in accordance with our statutory transparency obligations. [5 U.S.C. §552]
  4. EA seeks approval to review and process incoming messages from the news media to ensure that any emails that should be construed as FOIA requests are properly handled in accordance with our statutory transparency obligations. [5 U.S.C. §552]
  5. External Affairs seeks approval to monitor EA mailboxes for official correspondence from stakeholders, including letters to the Acting Director, petitions, and meeting requests; acknowledge receipt of official correspondence from stakeholders; and to draft CFPB updates to the Acting Director summarizing requests and proposed response. [12 U.S.C. § 5493(f)(3), 12 U.S.C. § 5493(c)(2), 12 U.S.C. § 5493(d)(2), 12 U.S.C. § 5493(e)(1), and 12 U.S.C. §5493(e)]. This will also ensure that any emails construed as FOIA requests are properly handled in accordance with our statutory transparency obligations. [5 U.S.C. §552]
  6. External Affairs seeks approval to work with Consumer Response to coordinate with FTC and other federal and state agencies to route complaints and access the consumer portal, where appropriate [(12 U.S.C. § 5493(b)(3)]
  7. External Affairs seeks approval to facilitate sharing consumer complaint information with prudential regulators, the Federal Trade Commission, other Federal agencies, and State agencies, subject to the standards applicable to Federal agencies for protection of the confidentiality of personally identifiable information and for data security and integrity [12 U.S.C. § 5493(b)(3)(D)]
  8. External Affairs seeks approval to coordinate with colleagues in the Office of Older Americans, the Office of Fair Lending and Equal Opportunity, the Office of Financial Education, and the Office of Servicemember Affairs, to fulfill statutory enforcement and public engagement requirements to work with other federal agencies and State regulators, private industry, fair lending, civil rights, consumer and community advocates on the promotion of fair lending compliance and education, consumer advocates, community organizations, civil rights organizations, non-profit organizations, and other relevant entities that fall under the responsibility of EA [12 U.S.C. § 5493(f)(3), 12 U.S.C. § 5493(c)(2), 12 U.S.C. § 5493(d)(2), 12 U.S.C. § 5493(e)(1), and 12 U.S.C. §5493(e)].
  9. External Affairs seeks approval to coordinate with colleagues approved for work in

CRE, SEFL, Enforcement, and RMR to support their market monitoring requirements in Dodd-Frank. The Digital Communications team is responsible for social media monitoring and may need to reinstate the social media monitoring contract to ensure that teams are appropriately able to monitor trends in the market. [12 U.S.C. § 5512(c)(1)]

10. External Affairs seeks approval to coordinate with colleagues in Design and Development to continue work required under the 21st Century IDEA Act and supporting OMB guidance which dictates requirements for all government websites, including related to accessibility from Section 508 of the Rehabilitation Act of 1973. [29 U.S.C. 794d, 44 U.S.C. §3501 and OMB Memo M-23-22]
11. External Affairs seeks approval to coordinate with colleagues in Design and Development to continue work to ensure the public can access statutorily required web content. [See attached]
12. External Affairs seeks approval to coordinate with colleagues in Financial Education to implement initiatives intended to educate and empower consumers, such as a digital financial toolkit for recently terminated financial employees seeking financial assistance with bills, in alignment with Financial Education requirements within Dodd-Frank. [12 U.S.C. § 5493(d)(2)]
13. External Affairs seeks approval to coordinate with other regulators including the Commission, the Commodity Futures Trading Commission, the Federal Trade Commission, and other Federal agencies and State regulators, as appropriate, to promote consistent regulatory treatment of consumer financial and investment products and services [12 U.S.C. § 5495 and 12 U.S.C. § 5496(c)].
14. External Affairs seeks approval to collaborate with colleagues in Supervision and Examinations to coordinate examinations and supervisory activities with the supervisory activities conducted by prudential regulators and the State bank regulatory authorities [12 U.S.C. §5514(b); 12 U.S.C. §5515(a), 12 U.S.C. §5515(e)].
15. External Affairs seeks approval to coordinate with Regulations once rulemaking recommences to allow for information flow between stakeholders and Bureau decision makers regarding agency rules (in proposed and finalized form) [12 U.S.C. §5512(b)].
16. External Affairs seeks approval to engage stakeholders to support markets teams in their statutorily mandated market monitoring activities [12 U.S.C. §5493(b) and 5512(c)].
17. External Affairs seeks approval to collaborate with Supervision and Enforcement staff to identify opportunities for stakeholders to share information about patterns and practices consumers are experiencing that may violate the law [12 U.S.C. §5515 and §5516].
18. External Affairs seeks approval to work with offices within RMR who have been approved by CFPB leadership to begin market monitoring functions including by conducting outreach to stakeholders that fall under the responsibility of EA [12 U.S.C. § 5493(f)(3), 12 U.S.C. § 5493(c)(2), 12 U.S.C. § 5493(d)(2), 12 U.S.C. § 5493(e)(1), and 12 U.S.C. §5493(e)].

We look forward to hearing your thoughts on continuing the work outlined above.

Thanks,

**LaShaun Warren**

Deputy Associate Director, External Affairs  
[REDACTED] - Mobile

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**From:** Warren, LaShaun (CFPB)  
**Sent:** Thursday, February 27, 2025 7:12 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** O'Brien, Patrick (CFPB) [REDACTED]  
**Subject:** RE: Statutory/Legal Required Work

Hi Adam,

Thanks for sending the email.

While the February 8, 2025 email from Acting Director Russ Vought outlined specific activities employees could not participate in unless expressly approved, the February 9, 2025 email from Acting Director Vought (attached and copied below) indicated employees should “not perform **any** work tasks.”

Over the last few weeks, External Affairs received and supported several “approved” requests including (1) reviewing contracts for termination, (2) terminating the advisory councils and (3) prepping and packing 1700 G Street due to the termination of the lease. In addition, earlier today Patrick O’Brien and I discussed the requirement to update the Consumer Advisory Boards charter and Membership Balance Plan by March 15, 2025. As a result, Patrick sent an email to Mark Paoletta (copied) at 2:47pm seeking guidance. Unfortunately, you were not copied on the email so please accept my apologies. The documents must be reviewed and approved by CFPB’s Director and Chief Legal Officer prior to submitting to the General Services Administration’s Committee Management Secretariat, the CFPB’s House and Senate authorizing committees, and the Librarian of Congress by March 14th. The CFPB must also issue a Federal Register notice and post the two documents on the CFPB’s public website as part of satisfying this obligation. The documents were previously cleared several weeks ago but recognize current leadership will likely want to review. Please let us know who these documents should be submitted to and the desired process to obtain approval.

This is the only immediately required statutorily required activity that I am aware of. I have polled my leadership team to see if there are any other urgent requests.

As you are aware, we are dedicated public servants ready to engage and serve the American people at any time. In the meantime, unless otherwise directed, we will abide by the guidance issued and will continue to raise items that are statutorily mandated.

Thank you for your continued support.

**From:** Vought, Russell [REDACTED]

CFPB\_00062

**Sent:** Monday, February 10, 2025 8:30 AM

**To:** \_DL\_CFPB\_AllHands <[REDACTED]>

**Subject:** Additional Directives on Bureau Activities

Good morning, CFPB staff,

As you have been informed by the Chief Operating Officer in an email yesterday, the Bureau's DC headquarters building is closed this week. Employees should not come into the office. **Please do not perform any work tasks.** If there are any urgent matters, please alert me through Mark Paoletta, Chief Legal Officer, to get approval in writing before performing any work task. His email is [REDACTED]. Otherwise, **employees should stand down from performing any work task.** Thank you for your attention on this matter.

Best,

Russ Vought

Acting Director

Bureau of Consumer Financial Protection

### **LaShaun Warren**

Deputy Associate Director, External Affairs

[REDACTED] - Mobile

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**From:** Martinez, Adam (CFPB) [REDACTED]

**Sent:** Thursday, February 27, 2025 4:47 PM

**To:** Warren, LaShaun (CFPB) [REDACTED]

**Subject:** Statutory/Legal Required Work

Hi LaShaun – Good afternoon.

Thank you for your patience as we continue through transition and our new leadership's review of the Bureau.

On February 8 (email attached), our Acting Director outlined several areas where work stoppage was being implemented at the Bureau including work conducted by External Affairs. He did exclude areas approved by him or required by law including statutory requirements.

We want to ensure that you are aware that you may reach out to Mark Paoletta, Chief Legal Officer with any questions regarding required reports or products you believe should continue at this time. Any actions or communications with outside parties must be sent to Mark and Daniel Shapiro, Deputy Chief Legal Officer.

Should you have any questions at all, please feel free to contact our Chief Legal Officer

as directed by the Acting Director. Alternatively, you are always welcome to reach out to me if needed. I am happy to share guidance provided to other leaders and employees regarding authorized work, including my own team.

Thank you for your support.

Adam

Adam Martinez  
Chief Operating Officer



**From:** [Paoletta, Mark \(CFPB\)](#)  
**To:** [Johnson, Christopher \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#)  
**Cc:** [Dorsey, Darian \(CFPB\)](#)  
**Subject:** Re: All Hands Message re: Work Required by Law  
**Date:** Sunday, March 2, 2025 8:10:41 PM

---

Hi Christopher,  
Thanks for reaching out. Yes, please reactivate staff to support your work and to reach out to stakeholders.  
Thanks.  
Mark

---

**From:** Johnson, Christopher (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 8:06:01 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; Dorsey, Darian (CFPB) [REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Hi Mark,

Thank you for providing clarity about performing work required by law.

Consistent with your direction and in light of our statutory obligations to conduct financial education programs (*Section 1021(c)(1)*) and to collect, investigate, and respond to consumer complaints (*Section 1021(c)(2)*), the Division of Consumer Response and Education will take steps to reactivate all staff full-time. This includes staff that perform statutorily mandated work and the small number of staff that provide critical support for these efforts (e.g., quality assurance audits, access management). I plan to communicate this direction to staff early tomorrow morning.

Those staff activated with your approval last Thursday (see attached) are continuing that work. From the complaint handling assessment, we have already determined that we have a backlog of requests from complaint process stakeholders, including companies, federal and state agencies, congressional offices, and others. Consistent with Acting Director's February 8<sup>th</sup> email, we are seeking your approval to engage these external stakeholders to address their concerns.

Please let me know if you have questions or concerns.

Christopher Johnson  
Associate Director | Division of Consumer Response and Education  
Office: [REDACTED] | Mobile: [REDACTED]

Bureau of Consumer Financial Protection  
[consumerfinance.gov](https://consumerfinance.gov)

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED] >  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

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Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

[REDACTED]

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**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Sunday, March 02, 2025 8:11 PM  
**To:** Johnson, Christopher (CFPB); Martinez, Adam (CFPB)  
**Cc:** Dorsey, Darian (CFPB)  
**Subject:** Re: All Hands Message re: Work Required by Law

Hi Christopher,  
Thanks for reaching out. Yes, please reactivate staff to support your work and to reach out to stakeholders.  
Thanks.  
Mark

---

**From:** Johnson, Christopher (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 8:06:01 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; Dorsey, Darian (CFPB) [REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Hi Mark,

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Those staff activated with your approval last Thursday (see attached) are continuing that work. From the complaint handling assessment, we have already determined that we have a backlog of requests from complaint process stakeholders, including companies, federal and state agencies, congressional offices, and others. Consistent with Acting Director's February 8<sup>th</sup> email, we are seeking your approval to engage these external stakeholders to address their concerns.

Please let me know if you have questions or concerns.

Christopher Johnson  
Associate Director | Division of Consumer Response and Education  
Office: [REDACTED] | Mobile: [REDACTED]

Bureau of Consumer Financial Protection  
[consumerfinance.gov](https://www.consumerfinance.gov)

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**From:** Martinez, Adam (CFPB) <[REDACTED]>  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
[REDACTED]

**Message from Mark Paoletta, Chief Legal Officer**

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Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Correal, Dubis \(CFPB\)](#)  
**To:** [Martinez, Adam \(CFPB\)](#); [Carmer, Alan \(CFPB\)](#); [Johnson, Christopher \(CFPB\)](#)  
**Cc:** [Paoletta, Mark \(CFPB\)](#); [\\_DL\\_CFPB\\_CRE\\_FinEd\\_FinEd\\_All](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 8:20:30 AM

---

Hi Adam and Alan,

Chris sent an email this morning reactivating the work of the Division, including the Office of Financial Education.

**Dubis Correal**

Deputy Assistant Director | Office of Financial Education

Mobile: [REDACTED]

Consumer Financial Protection Bureau

[consumerfinance.gov](https://consumerfinance.gov)

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 8:16 AM  
**To:** Carmer, Alan (CFPB) [REDACTED]; Johnson, Christopher (CFPB)  
[REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; [\\_DL\\_CFPB\\_CRE\\_FinEd\\_FinEd\\_All](#)  
[REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Alan –

I'd recommend that you check-in with your Associate Director this morning to discuss. Chris has the authority needed to continue the statutorily required work under his division.

Adam

Adam Martinez  
Chief Operating Officer

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**From:** Carmer, Alan (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 3:15 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; [\\_DL\\_CFPB\\_CRE\\_FinEd\\_FinEd\\_All](#)  
[REDACTED]

**Subject:** RE: All Hands Message re: Work Required by Law

Mr. Martinez,

I believe all the work in the Office of Financial Education is statutorily authorized and mandated. Please make clear whether the Office of Financial Education staff should resume their assigned duties to improve the financial literacy of consumers. A general outline of statutory responsibilities follows:

- *12 U.S.C. § 5411(c)(1)* states that “conducting financial education programs” is the first of several “primary functions” of the CFPB. **This work has been halted and should resume.**
- *12 U.S.C. § 5493(d)* requires the Office of Financial Education to develop *and implement* a strategy to improve the financial literacy of consumers. **This work has been halted and should resume.**
- *12 U.S.C. § 5493(d)(2)* states the office shall implement activities in several areas including financial counseling, savings, understanding credit scores, and debt strategies. **This work has been halted and should resume.**
- *12 U.S.C. 5493(d)(2)(D)(iii)* states the office shall implement activities to “improve the financial situation of the consumer.” **This work has been halted and should resume.**
- *12 U.S.C. 5493(d)(3)* requires staff to coordinate with other units in the bureau and specifically lists the Consumer Affairs Office and the research unit. **This work has been halted and should resume.**
- (*see 20 U.S.C § 9702*) Financial Literacy and Education Commission (FLEC).
  - *20 USC § 9702(d)* states that the Director of the CFPB serves as the co-Chair of the Financial Literacy and Education Commission (FLEC) with the Treasury Secretary as the chair.
  - *20 U.S.C. § 9702(c)(1)* states that the FLEC comprises representatives from 23 federal agencies and the White House Domestic Policy Council.
  - *20 U.S.C § 9702(e)* states the FLEC must hold a public meeting every 4 months. The last meeting was on 11/14/2024. **Staff planning for the next meeting has been halted and should resume.**
  - *12 U.S.C. § 5493(d)(2)* states the Office of Financial Education must work in consultation with the FLEC. **This work has been halted and should resume.**
- *12 U.S.C. § 5493(d)(4)* requires an annual report to Congress on the CFPB’s strategy and activities to improve financial literacy. **This work has been halted and should resume.**

I have served through each change of administration in the CFPB and fully expect any new director or acting director to communicate new priorities through management. Indeed, the Office of Financial Education has experienced multiple reorganizations and has been in at least 3 different divisions as priorities evolve with changes in leadership. Each reorganization was disruptive in its own way, but our work was never halted entirely as it seems to be now.

Again, please clarify that Office of Financial Education staff should resume their assigned duties to improve the financial literacy of consumers until new leadership is able to clearly communicate a change in financial education priorities.

The primary statute relied upon to establish the Office of Financial Education is copied below the

signature for reference.

Alan S. Carmer  
Attorney-Advisor  
Office of Financial Education  
Mobile: [REDACTED]

Consumer Financial Protection Bureau  
[consumerfinance.gov](https://consumerfinance.gov)

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12 U.S.C. § 5493(d)

*(1) Establishment*

*The Director shall establish an Office of Financial Education, which shall be responsible for developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions.*

*(2) Other duties*

*The Office of Financial Education shall develop and implement a strategy to improve the financial literacy of consumers that includes measurable goals and objectives, in consultation with the Financial Literacy and Education Commission, consistent with the National Strategy for Financial Literacy, through activities including providing opportunities for consumers to access—*

*(A) financial counseling, including community-based financial counseling, where practicable;*

*(B) information to assist with the evaluation of credit products and the understanding of credit histories and scores;*

*(C) savings, borrowing, and other services found at mainstream financial institutions;*

*(D) activities intended to—*

*(i) prepare the consumer for educational expenses and the submission of financial aid applications, and other major purchases;*

*(ii) reduce debt; and*

*(iii) improve the financial situation of the consumer;*

*(E) assistance in developing long-term savings strategies; and*

*(F) wealth building and financial services during the preparation process to claim earned income tax credits and Federal benefits.*

*(3) Coordination*

*The Office of Financial Education shall coordinate with other units within the Bureau in carrying out its functions, including—*

*(A) working with the Community Affairs Office to implement the strategy to improve financial literacy of consumers; and*

*(B) working with the research unit established by the Director to conduct research related to consumer financial education and counseling.*

*(4) Report*

*Not later than 24 months after the designated transfer date, and annually thereafter, the Director shall submit a report on its financial literacy activities and strategy to improve financial literacy of consumers to—*

*(A) the Committee on Banking, Housing, and Urban Affairs of the Senate; and*

*(B) the Committee on Financial Services of the House of Representatives.*

---

**From:** Martinez, Adam (CFPB) [REDACTED] >  
**Sent:** Sunday, March 2, 2025 12:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless “required by law” or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB



**From:** [Johnson, Christopher \(CFPB\)](#)  
**To:** [Martinez, Adam \(CFPB\)](#); [Carmer, Alan \(CFPB\)](#)  
**Cc:** [Paoletta, Mark \(CFPB\)](#); [\\_DL\\_CFPB\\_CRE\\_FinEd\\_FinEd\\_All](#); [Dorsey, Darian \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 8:20:47 AM

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Thank you for looping me in, Adam. Good morning, Alan. Please note an email was shared with all CRE Staff, including you at 6AM, that you are activated for work. Specific guidance will be shared with Dubis Correal this AM who will relay that in FinEd's Monday morning team meeting. Feel free to reach out to me directly if you have any questions.

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**From:** Martinez, Adam (CFPB) [REDACTED] >  
**Sent:** Monday, March 3, 2025 8:16 AM  
**To:** Carmer, Alan (CFPB) [REDACTED]; Johnson, Christopher (CFPB)  
[REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED] >; [\\_DL\\_CFPB\\_CRE\\_FinEd\\_FinEd\\_All](#)  
[REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Alan –

I'd recommend that you check-in with your Associate Director this morning to discuss. Chris has the authority needed to continue the statutorily required work under his division.

Adam

Adam Martinez  
Chief Operating Officer

---

**From:** Carmer, Alan (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 3:15 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; [\\_DL\\_CFPB\\_CRE\\_FinEd\\_FinEd\\_All](#)  
[REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Mr. Martinez,

I believe all the work in the Office of Financial Education is statutorily authorized and mandated. Please make clear whether the Office of Financial Education staff should resume their assigned duties to improve the financial literacy of consumers. A general outline of statutory responsibilities follows:

- *12 U.S.C. § 5411(c)(1)* states that “conducting financial education programs” is the first of several “primary functions” of the CFPB. **This work has been halted and should resume.**
- *12 U.S.C. § 5493(d)* requires the Office of Financial Education to develop *and implement* a

strategy to improve the financial literacy of consumers. **This work has been halted and should resume.**

- 12 U.S.C. § 5493(d)(2) states the office shall implement activities in several areas including financial counseling, savings, understanding credit scores, and debt strategies. **This work has been halted and should resume.**
- 12 U.S.C. 5493(d)(2)(D)(iii) states the office shall implement activities to “improve the financial situation of the consumer.” **This work has been halted and should resume.**
- 12 U.S.C. 5493(d)(3) requires staff to coordinate with other units in the bureau and specifically lists the Consumer Affairs Office and the research unit. **This work has been halted and should resume.**
- (see 20 U.S.C § 9702) Financial Literacy and Education Commission (FLEC).
  - 20 USC § 9702(d) states that the Director of the CFPB serves as the co-Chair of the Financial Literacy and Education Commission (FLEC) with the Treasury Secretary as the chair.
  - 20 U.S.C. § 9702(c)(1) states that the FLEC comprises representatives from 23 federal agencies and the White House Domestic Policy Council.
  - 20 U.S.C § 9702(e) states the FLEC must hold a public meeting every 4 months. The last meeting was on 11/14/2024. **Staff planning for the next meeting has been halted and should resume.**
  - 12 U.S.C. § 5493(d)(2) states the Office of Financial Education must work in consultation with the FLEC. **This work has been halted and should resume.**
- 12 U.S.C. § 5493(d)(4) requires an annual report to Congress on the CFPB’s strategy and activities to improve financial literacy. **This work has been halted and should resume.**

I have served through each change of administration in the CFPB and fully expect any new director or acting director to communicate new priorities through management. Indeed, the Office of Financial Education has experienced multiple reorganizations and has been in at least 3 different divisions as priorities evolve with changes in leadership. Each reorganization was disruptive in its own way, but our work was never halted entirely as it seems to be now.

Again, please clarify that Office of Financial Education staff should resume their assigned duties to improve the financial literacy of consumers until new leadership is able to clearly communicate a change in financial education priorities.

The primary statute relied upon to establish the Office of Financial Education is copied below the signature for reference.

Alan S. Carmer  
Attorney-Advisor  
Office of Financial Education  
Mobile: [REDACTED]

Consumer Financial Protection Bureau  
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12 U.S.C. § 5493(d)

*(1) Establishment*

*The Director shall establish an Office of Financial Education, which shall be responsible for developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions.*

*(2) Other duties*

*The Office of Financial Education shall develop and implement a strategy to improve the financial literacy of consumers that includes measurable goals and objectives, in consultation with the Financial Literacy and Education Commission, consistent with the National Strategy for Financial Literacy, through activities including providing opportunities for consumers to access—*

*(A) financial counseling, including community-based financial counseling, where practicable;*

*(B) information to assist with the evaluation of credit products and the understanding of credit histories and scores;*

*(C) savings, borrowing, and other services found at mainstream financial institutions;*

*(D) activities intended to—*

*(i) prepare the consumer for educational expenses and the submission of financial aid applications, and other major purchases;*

*(ii) reduce debt; and*

*(iii) improve the financial situation of the consumer;*

*(E) assistance in developing long-term savings strategies; and*

*(F) wealth building and financial services during the preparation process to claim earned income tax credits and Federal benefits.*

*(3) Coordination*

*The Office of Financial Education shall coordinate with other units within the Bureau in carrying out its functions, including—*

*(A) working with the Community Affairs Office to implement the strategy to improve financial literacy of consumers; and*

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*(A) the Committee on Banking, Housing, and Urban Affairs of the Senate; and*

*(B) the Committee on Financial Services of the House of Representatives.*

---

**From:** Martinez, Adam (CFPB) [REDACTED]

**Sent:** Sunday, March 2, 2025 12:33 PM

**Cc:** Paoletta, Mark (CFPB) [REDACTED]

**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

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Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Adams, Danielle \(CFPB\)](#); [Michalosky, Martin \(CFPB\)](#)  
**Subject:** RE: FOIA Processing  
**Date:** Monday, March 3, 2025 8:29:00 AM  
**Attachments:** [image001.png](#)

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Hi Danielle –

Anyone involved in the FOIA process should comply with your team’s request. When your team sends out request perhaps they can include a line that the work is legally required so the employee must comply.

Let me know if that works.

Thank you.

Adam

Adam Martinez  
Chief Operating Officer

---

**From:** Adams, Danielle (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 6:58 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]; Michalosky, Martin (CFPB)  
[REDACTED]  
**Subject:** RE: FOIA Processing  
**Importance:** High

Adam,

Does your recent all hands mean that anyone who supports the FOIA Team will also be permitted to perform work tasks? How should I facilitate that process?

Thanks,  
Danielle

Danielle Duvall Adams  
she/her/hers  
FOIA Manager  
Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) <[Adam.Martinez@cfpb.gov](mailto:Adam.Martinez@cfpb.gov)>  
**Sent:** Thursday, February 27, 2025 1:25 PM  
**To:** Michalosky, Martin (CFPB) <[Martin.Michalosky@cfpb.gov](mailto:Martin.Michalosky@cfpb.gov)>; Adams, Danielle (CFPB) <[Danielle.Adams@cfpb.gov](mailto:Danielle.Adams@cfpb.gov)>  
**Subject:** FOIA Processing

Hi Marty and Danielle –

I just spoke with Marty and FOIA has the green light to continue processing requests. Anyone on your team are authorized to perform the work.

Thank you.

Adam

Adam Martinez  
Chief Operating Officer

**From:** [Johnson, Christopher \(CFPB\)](#)  
**To:** [Martinez, Adam \(CFPB\)](#)  
**Subject:** FW: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 8:37:35 AM

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Information share, sir. Thanks, and let me know if you have any questions. I will be working with the teams throughout the day to ensure compliance.

---

**From:** Johnson, Christopher (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 5:59 AM  
**To:** \_DL\_CFPB\_CRE\_All [REDACTED]  
**Subject:** FW: All Hands Message re: Work Required by Law

Hello CRE Team,

I hope you each are doing well. I'm reaching out this morning to share that the CFPB's Chief Legal Officer has approved the reactivation of all CRE team members full-time in accordance with the guidance below. For any potential exceptions, I will reach out to share guidance directly with managers and section leaders this morning. As you resume your duties and normal work schedules, I'm sure questions will arise, please share those questions with your immediate Supervisor or Section leaders. We will do our best to work to obtain answers in a timely manner. I look forward to connecting with you soon. More importantly, thank you for your continued and unwavering commitment and service to the millions of consumers the CRE division assist each year in navigating an evolving financial marketplace.

Thanks,

Christopher Johnson  
Associate Director | Division of Consumer Response and Education  
Office: [REDACTED] | Mobile: [REDACTED]

Bureau of Consumer Financial Protection  
[consumerfinance.gov](https://consumerfinance.gov)

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**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 8:11 PM  
**To:** Johnson, Christopher (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Dorsey, Darian (CFPB) [REDACTED]

**Subject:** Re: All Hands Message re: Work Required by Law

Hi Christopher,

Thanks for reaching out. Yes, please reactivate staff to support your work and to reach out to stakeholders.

Thanks.

Mark

---

**From:** Johnson, Christopher (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 8:06:01 PM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; Dorsey, Darian (CFPB) [REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Hi Mark,

Thank you for providing clarity about performing work required by law.

Consistent with your direction and in light of our statutory obligations to conduct financial education programs (*Section 1021(c)(1)*) and to collect, investigate, and respond to consumer complaints (*Section 1021(c)(2)*), the Division of Consumer Response and Education will take steps to reactivate all staff full-time. This includes staff that perform statutorily mandated work and the small number of staff that provide critical support for these efforts (e.g., quality assurance audits, access management). I plan to communicate this direction to staff early tomorrow morning.

Those staff activated with your approval last Thursday (see attached) are continuing that work. From the complaint handling assessment, we have already determined that we have a backlog of requests from complaint process stakeholders, including companies, federal and state agencies, congressional offices, and others. Consistent with Acting Director's February 8<sup>th</sup> email, we are seeking your approval to engage these external stakeholders to address their concerns.

Please let me know if you have questions or concerns.

Christopher Johnson  
Associate Director | Division of Consumer Response and Education  
Office: [REDACTED] | Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

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It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Huggins, Cassandra \(CFPB\)](#)  
**Cc:** [Hagins, Calvin \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 10:09:00 AM

---

Hi Casey – Good morning.

I would highly encourage you to communicate with Mark P. regarding expectations. However, you are correct that the email sent out yesterday does not change the specific work stoppage in the bullet points issued on 8 February.

Adam

Adam Martinez  
Chief Operating Officer

---

**From:** Huggins, Cassandra (CFPB) [REDACTED] >  
**Sent:** Monday, March 3, 2025 10:02 AM  
**To:** Martinez, Adam (CFPB) [REDACTED] >  
**Cc:** Hagins, Calvin (CFPB) [REDACTED] >  
**Subject:** RE: All Hands Message re: Work Required by Law

Good morning,

I've received a number of messages from staff who are understandably confused by the information in this email. I would like to get clarification on what exactly Supervision staff is expected to be doing.

The Acting Director's February 8 message directed the stoppage of all supervision and examination activity, despite the fact that the work is required by law (12 CFR 1024, 1025, and 1026 require the Bureau to conduct such supervisory activities). We've also stopped all work supporting supervision and examination activity, including operational activities such as policy/procedure development; quality management reviews; systems and registration oversight; reporting, analytics, monitoring, exam prioritization/scheduling; and human capital activities that support supervision. We've also told staff to not engage in activities requiring coordination with parties outside of the Bureau, including coordination with other federal/state regulatory agencies, participation on FFIEC task forces/subcommittees, or engagement with supervised entities.

Supervision staff has been authorized to work on some isolated tasks ([REDACTED]), a handful of briefings/information gathering for Sr. leadership, and administrative tasks like WebTA/Concur approval), but otherwise it is my understanding that **they should continue to operate on administrative leave unless a discrete activity has been approved. Please confirm that the message you sent is not intended to authorize the reinstatement of supervision/examination activity despite the fact that the Bureau is required by law to conduct these activities.**

Thanks,  
Casey

Cassandra Huggins  
Principal Deputy Assistant Director | Supervision Policy & Operations  
Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) <[REDACTED]>  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) <[REDACTED]>  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

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Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer

CFPB

**From:** [Pappalardo, Janis \(CFPB\)](#)  
**To:** [Paoletta, Mark \(CFPB\)](#)  
**Cc:** [Martinez, Adam \(CFPB\)](#); [Shapiro, Daniel \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 10:15:15 AM

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Hi Mark,

I hope this note find you well!

I am reaching out to ensure that RMR meets your expectations on the scope and implementation of your March 2 guidance and guidance we received last week from Adam Martinez.

**Scope:** I understand that RMR is authorized to conduct all regular work related to fulfilling statutory obligations and/or work required by law, including regular management activities, albeit with limits on contact with outside parties. For example, I understand that we are authorized to perform work to comply with The Dodd-Frank Act and other laws and statutes, such as Section 502(a) of the Consumer Credit Card Market Act of 2009.

The RMR leadership team and I have reviewed our work against provisions of Dodd-Frank and other statutes. I believe that virtually all our work is conducted to meet the CFPB's statutory obligations. This implies that I expect we will bring virtually all RMR staff back to work.

**Implementation:**

-  
Outside Party Communication: According to the February 27 guidance from Adam Martinez: "Any actions or communications with outside parties must be sent to Mark Paoletta, Chief Legal Officer and Daniel Shapiro, Deputy Chief Legal Officer." Given the volume and nature of communications involved in carrying out our work, I understand that this is difficult to implement. I also understand that you recently approved Assistant Director McNamara's request to conduct statutorily required market monitoring, with a cc to Adam, Daniel, and you on substantive matters, but not on scheduling and maintenance issues and that the Office of Markets will make you and Daniel aware of market monitoring meetings. We plan to apply this same understanding to external monitoring communications by other RMR Offices.

I am proposing some additional implementation strategies for all RMR, below. Please let me know if you have any questions or concerns about these proposals.

- That communications within the federal government, with contracted entities, and within the Federal Reserve system that help us fulfill our statutory responsibilities will be pre-approved and not require your involvement. For example, a regular meeting with Federal Reserve system researchers about developments in risks to household

financial stability can continue.

- That we resume engagement with outside researchers and other parties to advance the Bureau's research responsibilities. This would include discussing research findings in meetings, workshops, and conferences with other government agencies, presenting research findings at academic conferences, and attending research conferences. We expect to follow the usual Bureau procedures for authorizing and clearing any presentations and conference attendance and will alert you and Daniel prior to any presentation or attendance at a non-governmental conference.
- That internal reports go forward without prior approval.
- That we will await guidance on publishing material on the Bureau website, although refreshing data on the Bureau website for the Consumer Credit Trends and Mortgage Performance Trends will continue.
- That we will resume disseminating our research findings under the Independent Research Policy. This includes resuming posting on the working paper series on Social Sciences Research Network, an outlet for disclaimed research, and in proceeding with academic publications.
- That we resume the regulatory inquiries function through which the Office of Regulations responds to requests from external parties, particularly small businesses, for informal guidance on regulatory matters. This is one of several tools the office uses to comply with its SBREFA obligations.

-

Please let me know if there is specific work that you would like us to move forward on or hold. Absent specific direction, I will use my discretion and best judgment to assign statutorily required work to staff.

Respectfully yours,

Jan

--

Janis K. Pappalardo  
Deputy Associate Director and Acting Associate Director  
Research, Monitoring, and Regulations  
Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) [REDACTED] >  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

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Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Kamenshine, Wendy \(CFPB\)](#)  
**To:** [Paoletta, Mark \(CFPB\)](#)  
**Cc:** [Martinez, Adam \(CFPB\)](#); [Asar, Sharon \(CFPB\)](#); [Garmon, Felisa \(CFPB\)](#); [Milner, Heather \(CFPB\)](#); [Fields, John \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 10:54:12 AM

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In accordance with the email below, the CFPB Ombudsman's Office team will work in conjunction with the statute.

The CFPB Ombudsman's Office provides an independent, impartial, and confidential resource to informally assist individuals, companies, consumer and trade groups, and others in resolving process issues with the CFPB.

Best,  
Wendy

**Wendy E. Kamenshine**

Ombudsman  
CFPB Ombudsman's Office

Tel: [REDACTED]  
Telecommunications Relay Service (TRS) users, dial [REDACTED]  
[REDACTED]

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

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statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Kamenshine, Wendy \(CFPB\)](#)  
**To:** [Paoletta, Mark \(CFPB\)](#)  
**Cc:** [Martinez, Adam \(CFPB\)](#); [Asar, Sharon \(CFPB\)](#); [Garmon, Felisa \(CFPB\)](#); [Milner, Heather \(CFPB\)](#); [Fields, John \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 10:54:12 AM

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In accordance with the email below, the CFPB Ombudsman's Office team will work in conjunction with the statute.

The CFPB Ombudsman's Office provides an independent, impartial, and confidential resource to informally assist individuals, companies, consumer and trade groups, and others in resolving process issues with the CFPB.

Best,  
Wendy

**Wendy E. Kamenshine**

Ombudsman  
CFPB Ombudsman's Office

Tel: [REDACTED]  
Telecommunications Relay Service (TRS) users, dial [REDACTED]

[consumerfinance.gov/ombudsman](https://consumerfinance.gov/ombudsman)

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless "required by law" or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing

statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

From: Lee, Scott (CFPB)  
 To: Martinez, Adam (CFPB)  
 Cc: Chang, Jean (CFPB); Broeksmit, Samuel (CFPB)  
 Subject: RE: Mandated Reports - Ops Q2/Q3  
 Date: Monday, March 3, 2025 11:30:40 AM

Ok thanks Adam – will reach out and coordinated with our offices.

Scott

From: Martinez, Adam (CFPB) [REDACTED]  
 Sent: Monday, March 3, 2025 10:58 AM  
 To: Lee, Scott (CFPB) [REDACTED]  
 Cc: Chang, Jean (CFPB) [REDACTED]; Broeksmit, Samuel (CFPB) [REDACTED]  
 Subject: RE: Mandated Reports - Ops Q2/Q3

Hey Scott –

Thank you for pulling all this together. It's helpful to see it all in one place because it really does expose the bureaucracy we deal with. Wow!

Please proceed with working with each Ops office to coordinate the continuation of work to respond to each of these. You may reference the legal requirement up front when asking for offices to perform the work, if necessary.

Adam

Adam Martinez  
 Chief Operating Officer

From: Lee, Scott (CFPB) [REDACTED]  
 Sent: Monday, March 3, 2025 10:35 AM  
 To: Martinez, Adam (CFPB) [REDACTED]  
 Cc: Chang, Jean (CFPB) [REDACTED]; Broeksmit, Samuel (CFPB) [REDACTED]  
 Subject: Mandated Reports - Ops Q2/Q3

Hi Adam,

Per the recent request – we've pulled a list of the mandated reports that Operations produces for Q2 – Q3. I've filtered it from between Feb. 15 – June 30 to limit the timeframe down. Per the previous order to work stop; unclear on the progress made on the ones due in February and early March.

Question for you: Given these reports are tied to a legal requirement, should we have our offices reinstate work on these items. If so – I can begin reaching out to those offices and their POCs to have them begin.

Scott

OFFICE OR TEAM	REPORT/PUBLICATION TITLE	DESCRIPTION AND ACTION[S] REQUIRED	LEGAL REQUIREMENT	RECEIVING ORGANIZATION	FY25 PUBLICATION DUE DATE[S]	DUE DATE STATUTORILY REQUIRED	APPROVING OFFICIAL
OFF/CFO	Annual Performance Plan and Report, and Budget Overview (Managed by OSPP)	The report describes the resources needed to accomplish our goals and measure our performance against our strategic plan. Strategy owns this document. The document also includes a budget section which the OCFO is responsible for. Budget section fulfills statutory requirement of 1017(a)(4)(A) financial operating plans and forecasts.	<a href="#">Dodd-Frank §1017(a)(4)(A) - Director shall provide to the Director of the Office of Management and Budget copies of the financial operating plans and forecasts of the Director, as prepared by the Director in the ordinary course of the operations of the Bureau. §.1016 also requires that a justification of the budget request of the previous year be provided with the semiannual report to Congress. (Note: there may be other requirements that govern the publication of strategic plans and performance information)</a>	FRB OMB Congress	2/15/2025	N	DIR
OFF/CFO	DATA Act	Submission of reconciliations of financial and procurement data that supports USASpending.gov	Public Law 113-101, dated May 9, 2014 and the official title is "Digital Accountability and Transparency Act of 2014"	USASpending.gov	2/15/2025	N	CFO
OFF/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	2/18/2025	N	CFO
CRO	GAO-IG Act Reporting	Annual report of external findings from GAO and OIG	<a href="#">Good Accounting Obligation in Government Act (GAO-IG Act) (Public Law 115-414)</a>	Congress GAO OIG	2/28/2025	N	DD
OFF/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	2/28/2025	N	CFO
OFF/PROC	Service Contract Inventory	Presents an analysis on CFPB's service contract inventory to determine if contract labor is used appropriately and the mix of Federal employees and contractors is balanced.	FY 2010 Consolidated Appropriations Act- Public Law 111-117 OMB memo, Dated Dec 19, 2011	OMB, MAX.GOV	2/28/2025	Y	COO
OFF/CFO	Annual Independent Performance Audit	Annual independent audit of the operations and budget of the Bureau. The purpose of this audit is to provide objective analyses to improve program performance and operations, reduce costs, facilitate decision-making, and contribute to public accountability	<a href="#">12 USC § 5496a</a>	Public (published on cfpb.gov)	2/28/2025	N	DD
OFF/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each	<a href="#">Dodd-Frank § 1017?</a>	Public (published on cfpb.gov)	2/28/2025	N	CFO

		quarter.					
OFF/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	2/28/2025	N	CFO
OCDO	Federal Electronic Records and Email Management Maturity Model Report	Report to determine how federal agencies manage electronic records.	The Federal Records Act (44 U.S.C. 31)	NARA	3/15/2025	N	COO
OCDO	Records Management Self-Assessment	The goal of the self assessment is to determine whether federal agencies are compliant with statutory and regulatory records management requirements.	The Federal Records Act (44 U.S.C. 31)	NARA	3/15/2025	N	COO
OCDO	Senior Agency Official of Records Management Report	Report documents how the Bureau is managing RIM activities and goals established by NARA	The Federal Records Act (44 U.S.C. 31)	NARA	3/15/2025	N	COO
OFF/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	3/18/2025	N	CFO
OFF/CFO	Quarterly Transfer Requests	Letters requesting transfer of funds from the Fed Reserve to CFPB	<a href="#">Dodd-Frank § 1017(a)(1)</a>	FRB Congress	3/20/2025	N	DIR
CRO	OIG Semiannual Report	OIG Federal Reserve provides semiannual report of significant activities, finds, and recommendations during a six month period.	P.L. 95-452	HFSC and BHUA	3/31/2025	Y	DIR
OHC	Financial Literacy and Education Plan (for Bureau Employees)	OPM requires agency benefits representatives to submit an annual financial literacy and education plan for agency employees.	Thrift Savings Plan Open Elections Act of 2004 (Public Law 108-469)	OPM	3/31/2025	N	CHCO
OHC	Student Loan Repayment Incentives	Agencies must submit an annual written report to the U.S. Office of Personnel Management (OPM) on their use of student loan repayments during the previous calendar year (CY), as required by 5 U.S.C. 5379(h).	5 U.S.C. 5379(h)(1) and 5 CFR 537.110(b)	OPM	3/31/2025	Y	CHCO
OCDO	Chief FOIA Officer Report	In accordance with the FOIA, each agency Chief FOIA Officer must "review and report to the Attorney General, through the head of the agency, at such times and in such formats as the Attorney General may direct, on the agency's performance in implementing [the FOIA]."	The Freedom of Information Act (FOIA), 5 U.S.C § 552(j)(2)(D).	DOJ	3/31/2025	Y	COO
OHC	Annual Data Call for Pathways Programs and Early Career Talent Hiring Reporting	Under Section 6 of Executive Order 14035: Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce, the Biden-Harris Administration directs agencies to increase availability of paid internships, fellowships, apprenticeships, and other early career programs.	5 CFR 362.109	OPM	4/1/2025	Y	CHCO
OHC	Telework Data Call	Participation in this annual survey is a requirement under the Telework Enhancement Act of 2010, Public Law 111-292 (the Act and is reported by OPM to Congress. The questions in this survey ask for information about agencies' telework program.	Telework Enhancement Act of 2010, Public Law 111-292	OPM	4/10/2025	N	COO
OFF/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	4/18/2025	N	CFO
T&I	Fiscal Year 20XX-20XX Guidance on Federal Information Security and Privacy Management Requirements - <b>EO14028 Metrics (Q1 &amp; Q3) &amp; Chief Information Officer Metrics (Q2)</b>	FY XX Q1 - Q3 Reporting via Cyberscope.	<a href="#">FY24 FISMA Guidance is not yet released.</a> <a href="#">OMB M-23-03 - FY23 [MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES]</a>	DHS OMB	4/18/2025	Y	COO
T&I	Strengthening the Cybersecurity of Federal Agencies by Enhancing the High Value Asset Program	FY2X HVA list report on a quarterly basis and provide updates and modifications via Homeland Security Information Network (HSIN)	<a href="#">OMB M-19-03</a>	DHS	4/18/2025	Y	COO
T&I	Improving Vulnerability Identification.	BOD 20-01 Vulnerability Disclosure Policy	<a href="#">OMB M-20-32</a>	DHS	4/18/2025	Y	OTHER

	Management, and Remediation	reporting via Cyberscope					
OCDO	Quarterly FOIA Report	In accordance with the FOIA, the Department of Justice requires agencies to provide quarterly reporting of four key FOIA statistics so that they can be posted on FOIA.gov.	5 U.S.C. § 552(e)(5), (j)(2)(D)	DOJ	4/25/2025	Y	COO
T&I	Migrating to Post-Quantum Cryptography (Inventory)	By May 4, 2023, and annually thereafter until 2035, or as directed by superseding guidance, agencies are directed to submit a prioritized inventory of information systems and assets, excluding national security systems, that contain CROC-vulnerable cryptographic systems to ONCD and the Department of Homeland Security Cybersecurity and Infrastructure Security Agency (CSA)	<a href="#">M-23-02</a>	DHS OMB	5/3/2025	Y	COO
OFF/CFO	DATA Act	Submission of reconciliations of financial and procurement data that supports USASpending.gov	Public Law 113-101, dated May 9, 2014 and the official title is "Digital Accountability and Transparency Act of 2014"	USASpending.gov	5/15/2025	N	CFO
OFF/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	5/18/2025	N	CFO
OFF/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	5/30/2025	N	CFO
OFF/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	<a href="#">Dodd-Frank § 1017?</a>	Public (published on cfpb.gov)	5/30/2025	N	CFO
OFF/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	5/30/2025	N	CFO
OCDO	Financial Stability Oversight Council (FSOC) Data Inventory	The Interagency Data Inventory is a product of the Data Committee of the Financial Stability Oversight Council (FSOC). The inventory catalogs the data collected by FSOC member organizations. The inventory contains information — metadata — about each data collection. It does not contain the underlying datasets. For each data collection, the inventory has basic information, such as a brief description of the collection, collecting organization, and the name and number of the form used to collect the data.	Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010	FSOC	5/31/2025	N	COO
OFF/CFO	Semiannual Report of Payments Accepted from a Non-Federal Source	As required by the statute, the Bureau must submit to the Director of the Office of Government Ethics reports of payments of more than \$250 accepted from non-Federal sources for travel, subsistence, and related expenses with respect to an employee's attendance at any meeting or similar function relating to the official duties of the employee.	31 U.S.C. 1553	OGE	5/31/2025	Y	CFO
T&I	Migrating to Post-Quantum Cryptography (Funding Estimates)	By June 4, 2023, and annually thereafter until 2035, or as directed by superseding guidance, agencies are required to submit to ONCD and OMB an assessment of the funding required to migrate information systems and assets inventoried under this memorandum to post-quantum cryptography during the following fiscal year.	<a href="#">M-23-02</a>	DHS OMB	6/4/2025	Y	COO
T&I	Update to Memorandum M-22-18, Enhancing the Security of the Software Supply Chain through Secure Software Development Practices	Agencies must submit metrics on collected attestation letters for all software subject to the requirements of M-22-18, as amended by this memorandum, as well as the on agency approval of POA&Ms AND number of extensions and waivers in place at each agency.	<a href="#">OMB M-23-16</a>	OMB	6/9/2025	Y	CFO
OFF/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	6/18/2025	N	CFO
OFF/CFO	Quarterly Transfer Requests	Letters requesting transfer of funds from the Fed Reserve to CFPB	<a href="#">Dodd-Frank § 1017(a)(1)</a>	FRB Congress	6/20/2025	N	DIR
OFF/PROC	Federal Activities Inventory Report (FAIR)	The Inventory depicts the CFPB's workforce by functions (or activities) performed by Bureau employees. The Inventory further breaks down these activities into Inherently Governmental (activities that can only be performed by a Federal employee) and Commercial (Activities that can be performed by Federal or contract employees) categories. The number of Full-Time Equivalents (FTEs) is also displayed by location.	Federal Activities Inventory Reform Act of 1998 (P.L. 105-270) and OMB Circular A-76 - Competitive Sourcing	Congress, OMB, MAX.GOV	6/30/2025	Y	COO

*Scott Lee*  
*Senior Advisor to the Chief Operating Officer - Operations*  
*Consumer Financial Protection Bureau (CFPB)*



**From:** [Gueye, Jafnar \(CFPB\)](#)  
**To:** [Chilbert, Christopher \(CFPB\)](#); [Johnson, Christopher \(CFPB\)](#); [Dorsey, Darian \(CFPB\)](#); [Brown, Jason \(CFPB\)](#); [Warren, LaShaun \(CFPB\)](#); [Vespa-Papaleo, Frank \(CFPB\)](#); [Huggins, Cassandra \(CFPB\)](#); [Gelfond, Rebecca \(CFPB\)](#)  
**Cc:** [Martinez, Adam \(CFPB\)](#); [Malik, Irfan \(CFPB\)](#); [Mullins, Katherine \(CFPB\)](#); [Chang, Jean \(CFPB\)](#); [James, Dana \(CFPB\)](#); [Galicki, Joshua \(CFPB\)](#); [Olson, Nicholas \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 11:39:29 AM

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Thanks Chris,

To add to that, we're getting a lot of requests to turn contracts back on. I will send out guidance shortly but for your awareness we are not turning back on every contract we've had. We're taking a very narrow approach: if without the contract the Bureau **can't** meet a statutory requirement then it will be considered for reactivation. Meaning that a contract enhancing our ability to meet a statutory requirement is not enough to get it back on. It needs to be the only way the bureau can currently meet that requirement.

Also as you're providing justifications please be prepared to have to defend those to external parties. We've been routinely asked to provide for names of the people providing the justification.

Respectfully,

Jafnar

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**From:** Chilbert, Christopher (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 10:22 AM  
**To:** Johnson, Christopher (CFPB) [REDACTED]; Dorsey, Darian (CFPB) [REDACTED]; Brown, Jason (CFPB) [REDACTED]; Warren, LaShaun (CFPB) [REDACTED]; Vespa-Papaleo, Frank (CFPB) [REDACTED]; Huggins, Cassandra (CFPB) [REDACTED]; Gelfond, Rebecca (CFPB) [REDACTED]; Gueye, Jafnar (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]; Malik, Irfan (CFPB) [REDACTED]; Mullins, Katherine (CFPB) [REDACTED]  
**Subject:** FW: All Hands Message re: Work Required by Law

Colleagues – As you work to restart some tasks that had stopped, please be aware that some of our T&I capacity is reduced. If there are capabilities that need to be restored, please let me know as soon as possible what specifically is needed and for what purpose.

Thanks,

Chris Chilbert  
[REDACTED]

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[REDACTED] Martinez, Adam (CFPB) [REDACTED] >  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**



On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless “required by law” or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

**From:** [Olson, Nicholas \(CFPB\)](#)  
**To:** [Gueye, Jafnar \(CFPB\)](#); [Bolton, Nykea \(CFPB\)](#); [Martinez, Adam \(CFPB\)](#)  
**Cc:** [CFPB\\_ReasonableAccommodations](#); [CFPB\\_Section508](#); [Jones, Stacie \(CFPB\)](#); [Nassar, Shaba \(CFPB\)](#); [Galicki, Joshua \(CFPB\)](#)  
**Subject:** RE: Request for contract reinstatement for legally/statutorily required approved DAPS work  
**Date:** Monday, March 3, 2025 11:41:42 AM  
**Attachments:** [RE Entellitrak question.msg](#)

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Nykea and all – Regarding the Entellitrak contract, Jafnar is correct that it has been reinstated. See attached email. If I recall correctly, this one (1) Entellitrak contract covers all applicable CFPB Offices (each office *used* to have its own separate contract). Please note that from the attached email, from the vendor’s Team: “Tyler says that they can get everything up and running by COB on Tuesday. If the sites also have SSO, it might take some additional steps, which could push to Wednesday.”

Sincerely,

Nick Olson  
Procurement Team Lead | Office of Finance and Procurement  
Mobile: [REDACTED]

Consumer Financial Protection Bureau  
[consumerfinance.gov](https://consumerfinance.gov)

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**From:** Gueye, Jafnar (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 11:33 AM  
**To:** Bolton, Nykea (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Cc:** CFPB\_ReasonableAccommodations [REDACTED]; CFPB\_Section508 [REDACTED]; Jones, Stacie (CFPB) [REDACTED]; Nassar, Shaba (CFPB) [REDACTED]; Galicki, Joshua (CFPB) [REDACTED]; Olson, Nicholas (CFPB) [REDACTED]  
**Subject:** RE: Request for contract reinstatement for legally/statutorily required approved DAPS work

Good morning Nykea,

Thank you for reaching.

- I’ll double check but I thought Entellitrak was turned back on.
- In general we are very narrowly turning back contracts (or portions of contracts) that directly support statutory requirements. In other words if without the contract the bureau would fail to meet those requirements, we would turn it back on. If the contract enhances or otherwise supplements our ability to meet requirements, they are not being turned back on at this stage because in those cases the bureau can meet its requirement (even if minimally) without it. Those contracts are subject to further review in our ongoing efforts to streamline bureau operations.

- For the ones you shared: can I please get a succinct justification for each contract you are requesting be reinstated? Specifically can you outline for each contract what (statutorily required) action will not be able to be accomplished at all without the contract? I can't stress enough that this needs to be as specific as possible. We'll need to be prepared to have someone on the team defend this justification to external parties.
- All PCards across the bureau have been cancelled. We've been authorized to reopen one for the entire bureau with a very limited limit so we are triaging the requests as they come in. I'm using the same criteria as above (i.e. directly being indispensable to meet a statutory requirement).

Respectfully,

Jafnar

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**From:** Bolton, Nykea (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 11:10 AM  
**To:** Gueye, Jafnar (CFPB) [REDACTED]; Martinez, Adam (CFPB) [REDACTED]  
**Cc:** CFPB\_ReasonableAccommodations [REDACTED]; CFPB\_Section508 [REDACTED]; Jones, Stacie (CFPB) [REDACTED]; Nassar, Shaba (CFPB) [REDACTED]  
**Subject:** Request for contract reinstatement for legally/statutorily required approved DAPS work

Good morning Jafnar,

I am reaching out after a call I had with Adam last week.

The Disability and Accessibility Program Section (DAPS ) has been given permission to resume its statutorily required work. To meet the demands of the statutes governing our work, we must have the resources of our contracts that were recently terminated. I have attached the Reasonable Accommodations (contract budgets sat with OMWI and T&I if tech aligned) and 508 (contract budget sat with T&I) contracts that provide services/resources we must legally provide if/when needed by the Bureau staff and public. We also would need our instance of the Entellitrak system of record reinstated, as we are legally required to keep and maintain a system of record for reasonable accommodations (we need access to the data previously entered and moving forward need a system to enter data in for processing and reporting efforts).

Can you assist us with identifying if we can reestablish these necessary/required contracts?

We are also trying to identify how we can do pcard purchases for incoming work, as well as paying invoices down that have been submitted due to contract terminations.

We will have to identify some sort of solution to provide the services we must legally provide to individuals with disabilities here at the Bureau and to public customers/users of our products and services, otherwise we could incur significant risks. I know this may take time to figure out, so any temporary solutions/processes would be helpful to identify if we can just turn the contracts back

on. If they cannot be re-instated, we will need to find a permanent solution as quickly as possible.

I am happy to meet to discuss the required needs and to answer any questions.

Thanks for your support!

Nykea Bolton  
Section Chief, Disability and Accessibility Programs Section  
Consumer Financial Protection Bureau  
Consumerfinance.gov

**From:** [Martinez, Adam \(CFPB\)](#)  
**To:** [Tirrell, Pax \(CFPB\)](#); [Rosenthal, Lisa \(CFPB\)](#)  
**Cc:** [Paoletta, Mark \(CFPB\)](#); [Huggins, Cassandra \(CFPB\)](#); [Hagins, Calvin \(CFPB\)](#)  
**Subject:** RE: All Hands Message re: Work Required by Law  
**Date:** Monday, March 3, 2025 12:41:00 PM

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Pax – Please feel free to seek guidance from your supervisor and Supervision Front Office. Any questions or concerns you have should be shared with Casey and Calvin who can then advise our Chief Legal Officer receive clarification.

Adam Martinez  
Chief Operating Officer

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**From:** Tirrell, Pax (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 11:46 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

My current understanding was that supervisory work was supposed to stop. But under 12 USC 5514(b)(1) the Bureau “shall require reports and conduct examinations on a periodic basis” of non-depository institutions. Therefore examination work of non-depository institutions appears to be a statutorily required function. Could you please authorize me to work on scheduled examinations of non-depository institutions?

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**From:** Martinez, Adam (CFPB) [REDACTED] >  
**Sent:** Sunday, March 2, 2025 12:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless “required by law” or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

[REDACTED]

---

**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Monday, March 03, 2025 8:07 PM  
**To:** Carmer, Alan (CFPB); Martinez, Adam (CFPB)  
**Cc:** \_DL\_CFPB\_CRE\_FinEd\_FinEd\_All  
**Subject:** RE: All Hands Message re: Work Required by Law

Good evening, Alan,

Thanks for your email. Consistent with my email, you should be performing these statutorily required duties.

Thanks.

Mark

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**From:** Carmer, Alan (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 3:15 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; \_DL\_CFPB\_CRE\_FinEd\_FinEd\_All  
[REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Mr. Martinez,

I believe all the work in the Office of Financial Education is statutorily authorized and mandated. Please make clear whether the Office of Financial Education staff should resume their assigned duties to improve the financial literacy of consumers. A general outline of statutory responsibilities follows:

- *12 U.S.C. § 5411(c)(1)* states that “conducting financial education programs” is the first of several “primary functions” of the CFPB. **This work has been halted and should resume.**
- *12 U.S.C. § 5493(d)* requires the Office of Financial Education to develop *and implement* a strategy to improve the financial literacy of consumers. **This work has been halted and should resume.**
- *12 U.S.C. § 5493(d)(2)* states the office shall implement activities in several areas including financial counseling, savings, understanding credit scores, and debt strategies. **This work has been halted and should resume.**
- *12 U.S.C. 5493(d)(2)(D)(iii)* states the office shall implement activities to “improve the financial situation of the consumer.” **This work has been halted and should resume.**
- *12 U.S.C. 5493(d)(3)* requires staff to coordinate with other units in the bureau and specifically lists the Consumer Affairs Office and the research unit. **This work has been halted and should resume.**
- (*see 20 U.S.C § 9702*) Financial Literacy and Education Commission (FLEC).
  - *20 USC § 9702(d)* states that the Director of the CFPB serves as the co-Chair of the Financial Literacy and Education Commission (FLEC) with the Treasury Secretary as the chair.
  - *20 U.S.C. § 9702(c)(1)* states that the FLEC comprises representatives from 23 federal agencies and the White House Domestic Policy Council.
  - *20 U.S.C § 9702(e)* states the FLEC must hold a public meeting every 4 months. The last meeting was on 11/14/2024. **Staff planning for the next meeting has been halted and should resume.**
  - *12 U.S.C. § 5493(d)(2)* states the Office of Financial Education must work in consultation with the FLEC. **This work has been halted and should resume.**
- *12 U.S.C. § 5493(d)(4)* requires an annual report to Congress on the CFPB’s strategy and activities to improve financial literacy. **This work has been halted and should resume.**

I have served through each change of administration in the CFPB and fully expect any new director or acting director to communicate new priorities through management. Indeed, the Office of Financial Education has experienced multiple reorganizations and has been in at least 3 different divisions as priorities evolve with changes in leadership. Each reorganization was disruptive in its own way, but our work was never halted entirely as it seems to be now.

Again, please clarify that Office of Financial Education staff should resume their assigned duties to improve the financial literacy of consumers until new leadership is able to clearly communicate a change in financial education priorities.

The primary statute relied upon to establish the Office of Financial Education is copied below the signature for reference.

Alan S. Carmer  
Attorney-Advisor  
Office of Financial Education  
Mobile: [REDACTED]

Consumer Financial Protection Bureau  
[consumerfinance.gov](https://www.consumerfinance.gov)

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12 U.S.C. § 5493(d)

*(1) Establishment*

*The Director shall establish an Office of Financial Education, which shall be responsible for developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions.*

*(2) Other duties*

*The Office of Financial Education shall develop and implement a strategy to improve the financial literacy of consumers that includes measurable goals and objectives, in consultation with the Financial Literacy and Education Commission, consistent with the National Strategy for Financial Literacy, through activities including providing opportunities for consumers to access—*

*(A) financial counseling, including community-based financial counseling, where practicable;*

*(B) information to assist with the evaluation of credit products and the understanding of credit histories and scores;*

*(C) savings, borrowing, and other services found at mainstream financial institutions;*

*(D) activities intended to—*

*(i) prepare the consumer for educational expenses and the submission of financial aid applications, and other major purchases;*

*(ii) reduce debt; and*

*(iii) improve the financial situation of the consumer;*

*(E) assistance in developing long-term savings strategies; and*

*(F) wealth building and financial services during the preparation process to claim earned income tax credits and Federal benefits.*

*(3) Coordination*

*The Office of Financial Education shall coordinate with other units within the Bureau in carrying out its functions, including—*

*(A) working with the Community Affairs Office to implement the strategy to improve financial literacy of consumers; and*

*(B) working with the research unit established by the Director to conduct research related to consumer financial education and counseling.*

*(4) Report*

*Not later than 24 months after the designated transfer date, and annually thereafter, the Director shall submit a report on its financial literacy activities and strategy to improve financial literacy of consumers to—*

*(A) the Committee on Banking, Housing, and Urban Affairs of the Senate; and*



*(B)the Committee on Financial Services of the House of Representatives.*

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Sunday, March 2, 2025 12:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless “required by law” or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

[REDACTED]

---

**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Monday, March 03, 2025 8:11 PM  
**To:** Martinez, Adam (CFPB); Muchnik, Irina (CFPB); Chilbert, Christopher (CFPB); Malik, Irfan (CFPB)  
**Cc:** Sayre, Stephen (CFPB); Scott, Adam (CFPB)  
**Subject:** RE: All Hands Message re: Work Required by Law

Good evening, Irina,

Yes, I concur with Adam's guidance.

Thanks.

Mark

---

**From:** Martinez, Adam (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 10:05 AM  
**To:** Muchnik, Irina (CFPB) [REDACTED]; Chilbert, Christopher (CFPB) [REDACTED]  
Malik, Irfan (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; Sayre, Stephen (CFPB) [REDACTED]; Scott, Adam (CFPB) [REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Hi Irina. Please work with Chris and Irfan to shift any resources needed to comply with the statute and any applicable laws/regulations. Thank you.

Adam Martinez  
Chief Operating Officer

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**From:** Muchnik, Irina (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 10:02 AM  
**To:** Martinez, Adam (CFPB) [REDACTED]  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]; Sayre, Stephen (CFPB) [REDACTED]; Scott, Adam (CFPB) [REDACTED]  
**Subject:** Re: All Hands Message re: Work Required by Law

Hi Adam,

Based on every email starting 2/10 the unambiguous guidance was to stop all work tasks, no stipulation of statute requirements was made.

As of today, Consumer Complaint Database(CCDB) has not had been refreshed with new data since 02/22/2025 and displays an error banner:

[https://www.consumerfinance.gov/data-research/consumer-complaints/search/?chartType=line&dateInterval=Month&dateRange=3y&date\\_received\\_max=2025-02-21&date\\_received\\_min=2022-02-21&lens=Product&searchField=all&subLens=sub\\_product&tab=Trends](https://www.consumerfinance.gov/data-research/consumer-complaints/search/?chartType=line&dateInterval=Month&dateRange=3y&date_received_max=2025-02-21&date_received_min=2022-02-21&lens=Product&searchField=all&subLens=sub_product&tab=Trends)

**Dodd Frank mandates:**

**The Consumer Financial Protection Bureau (CFPB) to maintain a public database where consumer complaints against financial institutions are recorded and published, ensuring transparency in the financial marketplace; this database is commonly referred to as the "CFPB Consumer Complaint Database".**

I am seeking authorization to fix underlying issue with data pipelines which load data for CCDB. Since the Data Products team lost all other developers when all contracts were canceled, I am also seeking authorization to utilize other member of D&D and EDA to assist as needed.

Thanks for your prompt attention,

Irina Muchnik

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**From:** Martinez, Adam (CFPB) [REDACTED]  
**Date:** Sunday, March 2, 2025 at 3:33 PM  
**To:**  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

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It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

[REDACTED]

---

**From:** Paoletta, Mark (CFPB) [REDACTED]  
**Sent:** Monday, March 03, 2025 8:14 PM  
**To:** Pappalardo, Janis (CFPB)  
**Cc:** Martinez, Adam (CFPB); Shapiro, Daniel (CFPB)  
**Subject:** RE: All Hands Message re: Work Required by Law

Good evening, Janis,

Thanks for email. Please proceed with your proposed implementation strategies.

Thanks.

Mark

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**From:** Pappalardo, Janis (CFPB) [REDACTED]  
**Sent:** Monday, March 3, 2025 10:15 AM  
**To:** Paoletta, Mark (CFPB) [REDACTED]  
**Cc:** Martinez, Adam (CFPB) [REDACTED]; Shapiro, Daniel (CFPB) [REDACTED]  
**Subject:** RE: All Hands Message re: Work Required by Law

Hi Mark,

I hope this note find you well!

I am reaching out to ensure that RMR meets your expectations on the scope and implementation of your March 2 guidance and guidance we received last week from Adam Martinez.

**Scope:** I understand that RMR is authorized to conduct all regular work related to fulfilling statutory obligations and/or work required by law, including regular management activities, albeit with limits on contact with outside parties. For example, I understand that we are authorized to perform work to comply with The Dodd-Frank Act and other laws and statutes, such as Section 502(a) of the Consumer Credit Card Market Act of 2009.

The RMR leadership team and I have reviewed our work against provisions of Dodd-Frank and other statutes. I believe that virtually all our work is conducted to meet the CFPB's statutory obligations. This implies that I expect we will bring virtually all RMR staff back to work.

**Implementation:**

Outside Party Communication: According to the February 27 guidance from Adam Martinez: "Any actions or communications with outside parties must be sent to Mark Paoletta, Chief Legal Officer and Daniel Shapiro, Deputy Chief Legal Officer." Given the volume and nature of communications involved in carrying out our work, I understand that this is difficult to implement. I also understand that you recently approved Assistant Director McNamara's request to conduct statutorily required market monitoring, with a cc to Adam, Daniel, and you on substantive matters, but not on scheduling and maintenance issues and that the Office of Markets

will make you and Daniel aware of market monitoring meetings. We plan to apply this same understanding to external monitoring communications by other RMR Offices.

I am proposing some additional implementation strategies for all RMR, below. Please let me know if you have any questions or concerns about these proposals.

- That communications within the federal government, with contracted entities, and within the Federal Reserve system that help us fulfill our statutory responsibilities will be pre-approved and not require your involvement. For example, a regular meeting with Federal Reserve system researchers about developments in risks to household financial stability can continue.
- That we resume engagement with outside researchers and other parties to advance the Bureau's research responsibilities. This would include discussing research findings in meetings, workshops, and conferences with other government agencies, presenting research findings at academic conferences, and attending research conferences. We expect to follow the usual Bureau procedures for authorizing and clearing any presentations and conference attendance and will alert you and Daniel prior to any presentation or attendance at a non-governmental conference.
- That internal reports go forward without prior approval.
- That we will await guidance on publishing material on the Bureau website, although refreshing data on the Bureau website for the Consumer Credit Trends and Mortgage Performance Trends will continue.
- That we will resume disseminating our research findings under the Independent Research Policy. This includes resuming posting on the working paper series on Social Sciences Research Network, an outlet for disclaimed research, and in proceeding with academic publications.
- That we resume the regulatory inquiries function through which the Office of Regulations responds to requests from external parties, particularly small businesses, for informal guidance on regulatory matters. This is one of several tools the office uses to comply with its SBREFA obligations.

Please let me know if there is specific work that you would like us to move forward on or hold. Absent specific direction, I will use my discretion and best judgment to assign statutorily required work to staff.

Respectfully yours,

Jan

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Janis K. Pappalardo  
Deputy Associate Director and Acting Associate Director  
Research, Monitoring, and Regulations  
Mobile: [REDACTED]

Consumer Financial Protection Bureau  
[consumerfinance.gov](https://consumerfinance.gov)

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**From:** Martinez, Adam (CFPB) [REDACTED] >  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) [REDACTED]  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless “required by law” or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

[REDACTED]

**From:** Huggins, Cassandra (CFPB) <[REDACTED]>  
**Sent:** Tuesday, March 4, 2025 5:13 PM  
**To:** Paoletta, Mark (CFPB)  
**Cc:** Hagins, Calvin (CFPB); Martinez, Adam (CFPB); Shapiro, Daniel (CFPB); Vought, Russell (CFPB); \_DL\_CFPB\_Supervision\_ALL  
**Subject:** RE: request for clarification for Supervision staff- FW: All Hands Message re: Work Required by Law  
**Attachments:** FW: All Hands Message re: Work Required by Law

Mark,

I am acknowledging that I received and read your email.

I am attaching, as requested, the email that I sent to Supervision staff. I did not provide this email to the media, and I do not know who did.

I did not intend to undermine the new administration’s ability to supervise agency staff- my only intention was to ensure that our staff did not act against the direction in the February 8 email from Acting Director Vought to cease all supervisory and examination activity. I will work with Supervision leadership to prepare the reports you have requested, and will request that all supervision staff provide the information you requested, by the stated deadline.

Thank you.

Cassandra Huggins  
Principal Deputy Assistant Director | Supervision Policy & Operations  
Mobile: [REDACTED]

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**From:** Paoletta, Mark (CFPB) <[REDACTED]>  
**Sent:** Tuesday, March 4, 2025 4:51 PM  
**To:** Huggins, Cassandra (CFPB) <[REDACTED]>  
**Cc:** Hagins, Calvin (CFPB) <[REDACTED]>; Martinez, Adam (CFPB) <[REDACTED]>; Shapiro, Daniel (CFPB) <[REDACTED]>; Vought, Russell (CFPB) <[REDACTED]>;  
\_DL\_CFPB\_Supervision\_ALL <[REDACTED]>  
**Subject:** RE: request for clarification for Supervision staff- FW: All Hands Message re: Work Required by Law

Good afternoon, Cassandra,

I am writing to raise significant concerns regarding an internal agency communication you apparently sent yesterday that directly contradicts an email from me to all CFPB staff about my direction for all staff to perform all statutorily required work.

In an email Adam Martinez sent on Sunday (March 2<sup>nd</sup>) conveying a message from me to the entire CFPB staff, I directed ALL CFPB staff to perform all work required by law and that they did not need to seek prior approval to do so. Nothing I have said or written since then contradicts that. You reached out to me yesterday, and as I am dual hatted and have job duties at OMB, I was not able to review and respond to your email yesterday. But I read a news report in Reuters that you reportedly sent an internal agency communication claiming that “We have requested and received clarification that their message was not intended to authorize the reinstatement of supervision/examination activity, even though the Bureau is required by law to carry out these activities.”

Importantly, you did not receive that message from me. You apparently relied on an email from Adam, but his email refers you to Acting Director Vought’s February 8<sup>th</sup> email which specifically states that you are to perform any work “required by law.” And he encouraged you to communicate with me, and presumably, wait to hear from me before sending out an email that directly contradicted my message on March 2<sup>nd</sup> to CFPB employees.

I am concerned that you sent out an internal agency communication on such an unfounded basis that is false and directly contradicts my March 2<sup>nd</sup> message without first getting confirmation directly from me. Your actions severely undermine the Agency leadership’s ability to supervise the agency staff and to ensure that statutorily required duties are being performed.

Moreover, your internal communication somehow made its way to the press, further undermining our efforts to supervise agency staff.

Let me be clear to you and the entire supervision office, which I have cc’d on this email: You are authorized and directed to work on matters specifically required by statute. That said, it is of course within the new leadership’s discretion as to what matters CFPB will focus on.

The Bureau’s new leadership seeks to understand the status of all of the agency’s actions so it can align such actions to the Bureau’s new priorities consistent with law. We have been aided in doing so by reports prepared by the Enforcement Division, Legal Division, and Office of Regulations showing the status of all actions within their respective purview, upcoming deadlines, statutory requirements, and other relevant matters. Such information is vital to allowing new leadership to ensure the Bureau is faithfully executing the law. And in fact, I have approved numerous requests from these and other divisions to perform work that is statutorily required or mission-aligned with the new leadership.

Accordingly, I am directing you to prepare a report for the Bureau’s leadership providing a description of all pending examination actions, including their current status. Provide the name of the lead CFPB examiner on each matter, and the contact information for the lead attorney for the company under examination.

As part of this report, please flag any particular actions that you believe are specifically required by statute. Leadership will review it and determine which actions to continue to pursue and to close.

Additionally, please notify every employee in your division to provide to me a written summary of the specific matters they are working on, with the name of the entity being examined, how the matter was commenced and approximately how many hours they have spent on the matter.

Please submit your report and direct every employee in your division to submit their response to me by COB Monday, March 10<sup>th</sup>.

Please confirm by 6 pm today that you have received and read this email.

Please forward to me by 6 pm the internal agency communication you reportedly sent that is quoted in the Reuters news report.



Finally, did you provide your internal agency communication to the media or do you know who provided it? Please provide your answer to me by 6 pm today.

Thank you for your prompt attention to this matter.

Mark

Mark Paoletta  
Chief Legal Officer  
CFPB

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**From:** Huggins, Cassandra (CFPB) <[REDACTED]>  
**Sent:** Monday, March 3, 2025 10:33 AM  
**To:** Paoletta, Mark (CFPB) <[REDACTED]>  
**Cc:** Hagins, Calvin (CFPB) <[REDACTED]>  
**Subject:** request for clarification for Supervision staff- FW: All Hands Message re: Work Required by Law

Good morning Mark,

I've received a number of messages from staff who are understandably confused by the information in the email sent by Adam Martinez. I would like to get clarification on what exactly Supervision staff is expected to be doing. I did reach out to Adam, and although he did say that supervision/examination activity is not to resume, he encouraged me to reach out to you directly for confirmation.

The Acting Director's February 8 message directed the stoppage of all supervision and examination activity, despite the fact that the work is required by law (12 CFR 1024, 1025, and 1026 require the Bureau to conduct such supervisory activities). We've also stopped all work supporting supervision and examination activity, including operational activities such as policy/procedure development; quality management reviews; systems and registration oversight; reporting, analytics, monitoring, exam prioritization/scheduling; and human capital activities that support supervision. We've also told staff to not engage in activities requiring coordination with parties outside of the Bureau, including coordination with other federal/state regulatory agencies, participation on FFIEC task forces/subcommittees, or engagement with supervised entities.

Supervision staff has been authorized to work on some isolated tasks ([REDACTED], a handful of briefings/information gathering for Sr. leadership, and administrative tasks like WebTA/Concur approval), but otherwise it is my understanding that **they should continue to operate on administrative leave unless a discrete activity has been approved. Please confirm that the message you sent is not intended to authorize the reinstatement of supervision/examination activity and the activities that support this function despite the fact that the Bureau is required by law to conduct these activities.**

Thanks,  
Casey

Cassandra Huggins  
Principal Deputy Assistant Director | Supervision Policy & Operations  
Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) <[REDACTED]>  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) <[REDACTED]>  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

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Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB

[REDACTED]

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**From:** Huggins, Cassandra (CFPB) <[REDACTED]>  
**Sent:** Monday, March 3, 2025 12:13 PM  
**To:** \_DL\_CFPB\_Supervision\_ALL  
**Subject:** FW: All Hands Message re: Work Required by Law

Supervision staff,

Calvin and I know that there is quite a bit of confusion surrounding the message we received from Adam Martinez/Mark Paoletta on March 2. We have requested and received clarification that **their message was not intended to authorize the reinstatement of supervision/examination activity, even though the Bureau is required by law to carry out these activities.** We are also not to resume any functions that support the supervision/examination program, and are not to communicate with parties outside of the Bureau on Bureau matters without receiving approval from the Chief Legal Officer.

It has been communicated to me that **Supervision staff should continue to operate on administrative leave as directed by the Acting Director unless you have received express permission to work on a task.** In general, this permission will come from Calvin, me, or your supervisor. Please do not work on anything else without authorization. If you have a question about whether you've been authorized to perform a task, please reach out to your supervisor. As a reminder, staff have been given permission to conduct some administrative tasks such as validating/certifying timecards in WebTA and submitting/approving vouchers in Concur. Some staff have also been authorized to work on discrete tasks and may continue to work on those as directed.

OSPO managers- if your teams are responsible for carrying out any other statutorily-mandated activities and you aren't sure whether they fall under the broader umbrella of supervisory or examination activity or activities that support this function, please send me an email with the activity and the specific statutory language that requires it, and I will send a request to the Chief Legal Officer.

Thanks,  
Casey

Cassandra Huggins  
Principal Deputy Assistant Director | Supervision Policy & Operations  
Mobile: [REDACTED]

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**From:** Martinez, Adam (CFPB) <[REDACTED]>  
**Sent:** Sunday, March 2, 2025 3:33 PM  
**Cc:** Paoletta, Mark (CFPB) <[REDACTED]>  
**Subject:** All Hands Message re: Work Required by Law

**Message from Mark Paoletta, Chief Legal Officer**

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8<sup>th</sup> email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless “required by law” or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta  
Chief Legal Officer  
CFPB