



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

March 26, 2025

CFPB, Attn: Chief FOIA Officer
1700 G Street NW
Washington, D.C. 20552

Re: Freedom of Information Act Request

Dear FOIA Officer:

Citizens for Responsibility and Ethics in Washington ("CREW") submits this request for records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and Consumer Financial Protection Bureau ("CFPB") regulations.

Specifically, CREW requests a **list of all** CFPB personnel currently on administrative leave as of the date this request is processed, including each employee's position, title, and total annual salary.

The above request excludes agency records consisting solely of news articles, press clippings, and other publicly-available material, so long as the records include no accompanying discussion by agency officials.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, and anyone who was cc'ed or bcc'ed on any emails.

If it is your position any portion of the requested records is exempt from disclosure, CREW requests that you provide it with an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). If some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. See 5 U.S.C. § 552(b). If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. See *Mead Data Central v. U.S. Dep't of the Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

Please be advised that CREW intends to pursue all legal remedies to enforce its rights under FOIA. Accordingly, because litigation is reasonably foreseeable, the agency should

institute an agencywide preservation hold on all documents potentially responsive to this request.

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A) and agency regulations, CREW requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures likely will contribute to a better understanding of relevant government procedures by CREW and the general public in a significant way. *See id.* § 552(a)(4)(A)(iii). Moreover, the request primarily and fundamentally is for non-commercial purposes. *See, e.g., McClellan Ecological v. Carlucci*, 835 F.2d 1282, 1285 (9th Cir. 1987).

In February 2025, then-Acting CFPB Director Russell Vought reportedly instructed agency employees to cease work on any CFPB tasks, and instructed employees not to come into the office, which he closed.¹ Several news outlets have reported of a planned reduction-in-force (“RIF”) at the agency,² although the RIF and some reported layoffs were temporarily halted by Judge Amy Berman Jackson.³ The CFPB, created to protect consumers in the wake of the 2009 Great Recession,⁴ has helped millions of Americans and returned more than \$21 billion to consumers through its supervisory and enforcement work.⁵ Given the CFPB’s record bringing relief to consumers, the actions of the Trump administration to place staff on administrative leave will cost taxpayers money, while hindering the consumer protection mandate. New York State Attorney General Letitia James, who has led a coalition of 23 state attorneys general in supporting the CFPB’s work in the face of these attacks, stated that “weakening this agency puts consumers and everyday Americans at risk.”⁶ It is crucial for the public to have information about how many CFPB employees are on administrative leave, their titles, and how much these employees earn from the CFPB, as these individuals are receiving taxpayer funds but are not being allowed to work on behalf of the taxpayer to ensure protection of individual consumers and supervision of the broader financial system.

¹ Joe Hernandez, *The Trump administration has stopped work at the CFPB. Here's what the agency does*, WAMU 88.5, Feb. 10, 2025, <https://www.npr.org/2025/02/10/nx-s1-5292123/the-trump-administration-has-stopped-work-at-the-cfpb-here-s-what-the-agency-does>

² Evan Weinberger, *Trump Plans to End CFPB Despite Reviving Work, Official Says*, Bloomberg Law, Mar. 11, 2025, <https://news.bloomberglaw.com/banking-law/trump-plans-to-abolish-cfpb-despite-reviving-work-official-says>

³ *Federal Judge Issues Order Prohibiting Massive Layoffs, Budget Cuts at CFPB Pending Ruling on Motion for Preliminary Injunction*, Ballard Spahr, LLP, Feb. 18, 2025, <https://www.consumerfinancemonitor.com/2025/02/18/federal-judge-issues-order-prohibiting-massive-layoffs-budget-cuts-at-cfpb-pending-ruling-on-motion-for-preliminary-injunction/>

⁴ Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203, § 929-Z, 124 Stat. 1376, 1871 (2010) (codified at 15 U.S.C. § 78o), <https://www.congress.gov/111/statute/STATUTE-124/STATUTE-124-Pg1376.pdf>

⁵ Jason Powell, *Attacks on the CFPB highlight DOGE's pretense*, Citizens for Responsibility and Ethics in Washington, Feb. 28, 2025, <https://www.citizensforethics.org/news/analysis/attacks-on-the-cfpb-highlight-doges-pretense/>

⁶ Letitia James, *Attorney General James Takes Action to Keep the Consumer Financial Protection Bureau Working*, Office of the New York State Attorney General, Feb. 21, 2025, <https://ag.ny.gov/press-release/2025/attorney-general-james-takes-action-keep-consumer-financial-protection-bureau#:~:text=23%20AGs%20File%20Second%20Amicus.Working%20will%20Harm%20Everyday%20Americans>

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public's right to be aware of the activities of government officials, to ensuring the integrity of those officials, and to highlighting and working to reduce the influence of money on politics. CREW uses a combination of research, litigation, and advocacy to advance its mission. CREW intends to analyze the information responsive to this request and to share its analysis with the public through reports, press releases, or other means. In addition, CREW will disseminate any documents it acquires from this request to the public through its website, www.citizensforethics.org. The release of information obtained through this request is not in CREW's financial interest.

CREW further requests that it not be charged search or review fees for this request pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) because CREW qualifies as a member of the news media. *See Nat'l Sec. Archive v. U.S. Dep't of Defense*, 880 F.2d 1381, 1386 (D.C. Cir. 1989) (holding non-profit a "representative of the news media" and broadly interpreting the term to include "any person or organization which regularly publishes or disseminates information to the public").

CREW routinely disseminates information obtained through FOIA to the public in several ways. For example, CREW's website receives over 150,000 page views every month. The website includes blogposts that report on and analyze newsworthy developments regarding government ethics, corruption, and money in politics, as well as numerous reports CREW has published to educate the public about these issues. These reports frequently rely on government records obtained through FOIA. CREW also posts the documents it obtains through FOIA on its website.

Under these circumstances, CREW satisfies fully the criteria for a fee waiver.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at sfrank-stempel@citizensforethics.org and foia@citizensforethics.org or call me at (202) 408-5565. Also, if CREW's request for a fee waiver is denied, please contact our office immediately upon making such a determination.

Where possible, please produce records in electronic format. Please send the requested records to sfrank-stempel@citizensforethics.org and foia@citizensforethics.org or by mail to Sasha Frank-Stempel, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

Sasha Frank-Stempel
Legislative Fellow