



**Robert G. Cameron**  
CFPB Private Education Loan Ombudsman

**Biography & Work Experience**

Robert G. Cameron “Earned His Law Degree From The Duquesne University School Of Law And Undergraduate Degree From Washington And Jefferson College, Both Located In Pennsylvania.” [[Press Release](#), Consumer Financial Protection Bureau,08/16/19]

Dates	Position	Employer	Notes	Source
Aug. 2019 - Present	Private Education Loan Ombudsman	CFPB		<a href="#">CFPB Press Release</a>
	Deputy Chief Counsel And Vice President Of Enterprise Compliance	Pennsylvania Higher Education Assistance Agency (PHEAA)		<a href="#">American Banker</a>
		Pennsylvania Treasury Department		<a href="#">CFPB Press Release</a>
		Pennsylvania Governor’s Office of General Counsel		<a href="#">CFPB Press Release</a>
		Marshall, Dennehey, Warner, Coleman & Goggin		<a href="#">U.S. District Court for Western District of Pennsylvania</a>
	Colonel And Staff Judge Advocate	Pennsylvania Army National Guard		<a href="#">CFPB Press Release</a>
		United States Army		<a href="#">CFPB Press Release</a>

**Robert G. Cameron, Once A Senior Lawyer For PHEAA While It Battled Class-Action Lawsuits And State Regulators For Allegedly Mishandling Student**

## **Loans, Is Now Supposed To Be Trusted As The CFPB's Private Student Loan Ombudsman**

**CFPB Private Education Loan Ombudsman Robert G. Cameron Has Been Deputy Chief Counsel And Vice President Of Enterprise Compliance For PHEAA, A Student Loan Servicer That Has Been Sued For Failing To Properly Process Payments And Was Found To Be "Derailing" Hundreds Of Borrowers From Receiving Public Service Loan Forgiveness.**

**In August 2019, Robert G. Cameron Was Named The Consumer Financial Protection Bureau's (CFPB's) Private Education Loan Ombudsman, A Position Responsible For Resolving Complaints From Borrowers And Making Recommendations To Top Officials And Congress.**

**In August 2019, The Consumer Financial Protection Bureau (CFPB) Announced That Robert G. Cameron Would Become The Bureau's Private Education Loan Ombudsman.** On August 16, 2019, "The Consumer Financial Protection Bureau (Bureau) announced the appointment of Robert G. Cameron to serve as the Bureau's private education loan ombudsman." [[Press Release](#), Consumer Financial Protection Bureau,08/16/19]

**The Private Education Loan Ombudsman, A Position Created Under Dodd-Frank Financial Reform, "Is Responsible For Receiving, Reviewing, And Attempting To Resolve Complaints From Private Student Loan Borrowers."** "The Dodd-Frank Act created a private education loan ombudsman position within the Bureau. The Dodd-Frank Act gave the Treasury Secretary, in consultation with the CFPB Director, the authority to designate the ombudsman. The ombudsman is responsible for receiving, reviewing, and attempting to resolve complaints from private student loan borrowers." [[Press Release](#), Consumer Financial Protection Bureau,08/16/19]

**The Private Education Ombudsman Is Also Responsible For "Analyzing Complaint Data" And Making Recommendations To The CFPB Director, The Treasury Secretary, The Secretary Of Education, And Congress.** "The ombudsman is also responsible for compiling and analyzing complaint data on private education loans and making appropriate recommendations to the Secretary of the Treasury, the Bureau Director, the Secretary of Education, and Congress." [[Press Release](#), Consumer Financial Protection Bureau,08/16/19]

**Robert G. Cameron Previously Served As The Deputy Chief Counsel And Vice President Of Enterprise Compliance For The Pennsylvania Higher Education Assistance Agency (PHEAA).**

**Robert G. Cameron Served As PHEAA’s Deputy Chief Counsel And Vice President Of Enterprise Compliance, Primarily Responsible For “Litigation, Compliance And Risk Mitigation Efforts At The Agency.”** “Cameron, a former colonel and advocate for the National Guard, had been deputy chief counsel and vice president of enterprise compliance at the Pennsylvania Higher Education Assistance Agency. [...] The CFPB said Cameron was responsible for litigation, compliance and risk mitigation efforts at the agency.” [Kate Berry, [“CFPB names student loan servicing exec as ombudsman,”](#) *American Banker*, 08/16/19]

## **Robert G. Cameron Provided Legal Representation For PHEAA As Early As October 2010.**

**Robert G. Cameron Was Assigned To Represent PHEAA In A Bankruptcy Case On October 22, 2010.** [[Attorneys, Helene M. Wolfarth and Sean M. Wolfarth Bankruptcy Case](#), Case No. 10-26492-CMB]

## **As Of September 2018, PHEAA Was Facing Ten Class-Action Lawsuits Brought By Tens Of Thousands Of Borrowers Who Have Been Saddled With Additional Debt Because The Servicer Failed To Properly Process Payments.**

**PHEAA Currently Is Facing Ten Class-Action Lawsuits That Have Been Bundled In Federal Court In Philadelphia Brought By Tens Of Thousands Of Borrowers Who “Have Been Saddled With Additional Debt Because PHEAA Cannot Or Will Not Properly Process Their Payments.”** University of Pittsburgh Law graduate Arianne Gallagher was “a plaintiff in one of 10 class-action lawsuits filed against the Pennsylvania Higher Education Assistance Agency that have been bundled in federal court in Philadelphia. The plaintiffs — borrowers from 10 states — say they represent tens of thousands who have been saddled with additional debt because PHEAA cannot or will not properly process their payments. The agency, which conducts its federal loan business as FedLoan Servicing, does not comment on pending litigation, spokesman Keith New said. But he maintains PHEAA is living up to the terms of its contracts with the U.S. Department of Education. The federal agency hired PHEAA to process payments on 7.6 million student loans, which represents about a quarter of the \$1.3 trillion in federal student loan debt owed by 44 million Americans.” [Deb Erdley, [“Federal class-action lawsuits target practices of Pennsylvania-based student loan agency,”](#) *Pittsburgh Tribune-Review*, 09/01/18]

**PHEAA Was Sued In Massachusetts For Allegedly Preventing “Borrowers From Making Qualifying Monthly Payments That Count Toward Loan Forgiveness” And Also For Overcharging Students.** In 2017, “Massachusetts Attorney General Maura Healey filed the lawsuit against Pennsylvania Higher Education Assistance Agency, which manages over a fourth of the nation’s \$1.4 trillion student loan debt on behalf of various lenders. The complaint, filed in Suffolk County Superior Court, claimed PHEAA caused teachers and other public servants to lose benefits and financial assistance under two federal programs.” [Nate Raymond, [“Massachusetts accuses PHEAA of unfair student loan servicing practices,”](#) *Reuters*, 08/23/17]

- “According to Healey’s lawsuit, PHEAA has prevented borrowers from making qualifying monthly payments that count toward loan forgiveness and also overcharged students.” [Nate Raymond, “[Massachusetts accuses PHEAA of unfair student loan servicing practices](#),” *Reuters*, 08/23/17]

## **FedLoan, “An Arm Of” PHEAA, Is The Only Servicer That Manages Loans For Borrowers Pursuing Public Service Loan Forgiveness.**

**FedLoan, “An Arm Of” PHEAA, “Is The Only Servicer Designated By The Education Department To Manage Loans Held By Borrowers Pursuing Public Service Loan Forgiveness.”** “FedLoan, an arm of Pennsylvania Higher Education Assistance, is the only servicer designated by the Education Department to manage loans held by borrowers pursuing Public Service Loan Forgiveness.” [Danielle Douglas-Gabriel, “[Watchdog agency blasts government contractor for mishandling student loan forgiveness program](#),” *The Washington Post*, 06/22/17]

- **The Department Of Education Manages The PSLF Program And Contracts With A Single Loan Servicer—FedLoan—“To Handle Day-To-Day Activities Associated With The Program,” Including Making Determinations About Whether Employment And Loans Qualify For PSLF.** “The Department of Education (Education) manages the PSLF program and contracts with a single loan servicer to handle day-to-day activities associated with the program, which include responding to borrower inquiries, making preliminary determinations about whether borrowers’ employment and loans qualify for PSLF, and processing loan forgiveness applications.” [“[Public Service Loan Forgiveness: Education Needs to Provide Better Information for the Loan Servicer and Borrowers](#),” U.S. Government Accountability Office, 09/05/18]

**The First Borrowers Began Applying For Loan Forgiveness In September 2017, Ten Years After The PSLF Program Was Established.** “Starting in September 2017, borrowers began applying to have their federal student loans forgiven through the Public Service Loan Forgiveness (PSLF) program. This program, established by law in 2007, is intended to encourage individuals to enter and continue careers in public service by forgiving borrowers’ remaining federal student loan balances after they have made at least 10 years of loan payments while working in public service and meeting other requirements.” [“[Public Service Loan Forgiveness: Education Needs to Provide Better Information for the Loan Servicer and Borrowers](#),” U.S. Government Accountability Office, 09/05/18]

## **In 2017, The CFPB Reported That FedLoan Was “Derailing Hundreds Of Public-Sector Workers From Receiving Student Loan Forgiveness.”**

**In A 2017 Report, The CFPB Found That Fedloan Was “Derailing Hundreds Of Public-Sector Workers From Receiving Student Loan Forgiveness.”** “Flawed payment processing, botched paperwork and inaccurate information from FedLoan Servicing is derailing hundreds of public-sector workers from receiving student loan forgiveness, the Consumer Financial Protection Bureau said in a [report](#) Thursday.” [Danielle Douglas-Gabriel, “[Watchdog agency](#)”

[blasts government contractor for mishandling student loan forgiveness program,](#)” *The Washington Post*, 06/22/17]

## **Data From The Department Of Education Showed That 99% Of Applications For Loan Forgiveness Under The Program Were Denied, As Of October 2018.**

**“[...] Recent Data From The Department Of Education Show That 99 Percent Of Applications For Loan Forgiveness Have Been Denied.”** “But recent data from the Department of Education show that *99 percent* of applications for loan forgiveness have been denied. The pitch may have been simple, but the execution was anything but.” [Cory Turner, [“Why Public Service Loan Forgiveness Is So Unforgiving,”](#) *NPR*, 10/17/18]

## **In The First Eight Months Since Borrowers Became Eligible To Apply For Loan Forgiveness Under PSLF, Only 55 Borrowers Out Of 19,300 Were Approved.**

**The Government Accountability Office (GAO) Found That, Out Of The 19,300 Applications Submitted By Borrowers Between September 2017 And April 2018, Only 55 Borrowers Were Approved For Loan Forgiveness.** “In the first 8 months that borrowers were able to apply for loan forgiveness (September 2017 through April 2018), Education had approved 55 borrowers and forgiven a total of almost \$3.2 million in outstanding student loan balances, an average of almost \$58,000 per borrower. The amount of loan forgiveness for individual borrowers ranged from almost \$800 to almost \$290,000. Over 19,300 borrowers had submitted loan forgiveness applications as of April 2018.” [[“Public Service Loan Forgiveness: Education Needs to Provide Better Information for the Loan Servicer and Borrowers,”](#) U.S. Government Accountability Office, 09/05/18]

**Robert G. Cameron Authored A Presentation To The Student Loan Industry Warning That Courts Are Interpreting Consumer Protection Laws “Even More Liberally In Favor Of The Consumer”—His Presentation Also Advised Industry To “Create Situations Where There Are Easy Facts To Support A Motion To Dismiss” Lawsuits Brought By Consumers.**

**While Robert G. Cameron Was PHEAA’s Deputy Chief Counsel, He Authored A Presentation On The Telephone Consumer Protection Act (TCPA) To The National Council Of Higher Education Loan Resources (NCHER), The “Largest Higher Education Finance Trade Association.”**

**On Behalf Of PHEAA, Robert G. Cameron Gave A Presentation On The Telephone Consumer Protection Act (TCPA) At A Legal Meeting For The National Council Of Higher**

Education Resources (NCHER). [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

- **The National Council Of Higher Education Resources Is The “Largest Higher Education Finance Trade Association,” With Member Including “Lenders, Servicers, Guaranty Agencies, Collection Agencies, Financial Literacy Providers, And Schools.”** “The National Council of Higher Education Resources (NCHER) is the nation’s oldest and largest higher education finance trade association. NCHER’s membership includes state, nonprofit, and for-profit higher education service organizations, including lenders, servicers, guaranty agencies, collection agencies, financial literacy providers, and schools, interested and involved in increasing college access and success.” [["About Us,"](#) NCHER, accessed 11/27/19]
- **Robert G. Cameron Served As PHEAA’s Deputy Chief Counsel And Vice President Of Enterprise Compliance, Primarily Responsible For “Litigation, Compliance And Risk Mitigation Efforts At The Agency.”** “Cameron, a former colonel and advocate for the National Guard, had been deputy chief counsel and vice president of enterprise compliance at the Pennsylvania Higher Education Assistance Agency. [...] The CFPB said Cameron was responsible for litigation, compliance and risk mitigation efforts at the agency.” [Kate Berry, [“CFPB names student loan servicing exec as ombudsman,”](#) *American Banker*, 08/16/19]

### **Robert G. Cameron’s Presentation Warned NCHER That “Consumer Protection Statutes Are Being Construed Even More Liberally In Favor Of The Consumer.”**

**A Slide About The “Overall Litigation Trend” In Robert G. Cameron’s Presentation Warned, “Consumer Protection Statutes Are Being Construed Even More Liberally In Favor Of The Consumer.”** [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

### **Robert G. Cameron’s Presentation Claimed “The Game Changer” In TCPA Caselaw Was A Supreme Court Decision Holding That Federal And State Courts Both Have Jurisdiction Over TCPA Lawsuits— Cameron’s Presentation Noted That TCPA Cases “Doubled Since This Decision.”**

**Robert G. Cameron’s Presentation Claimed “The Game Changer” In TCPA Caselaw Was “Mims V. Arrow Financial Services, LLC, 132 S.Ct. 740(2012),” A “Supreme Court Decision That Held Federal And State Courts Have Concurrent Jurisdiction Over TCPA Suits.”** [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

**Robert G. Cameron’s Presentation Claimed “TCPA Cases Have Doubled Since This Decision.”** [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

## **Robert G. Cameron's Presentation Told NCHER To "Encourage Statutory And Regulatory Change" To "Make It Better," Presumably Referring To Industry's Vulnerability To TCPA Lawsuits.**

One Of Robert G. Cameron's Slides On "How To Make It Better" Told NCHER To "Encourage Statutory And Regulatory Change." [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

## **Robert G. Cameron's Presentation Informed NCHER About Court Precedents Holding That Consumers Cannot Revoke Their Consent To Receive Automated Calls.**

One Of Robert G. Cameron's Slides About "Revocation Of Prior Consent" In TCPA Caselaw Explained Court Precedents Holding That Consumers May Not Revoke Consent To Receive Autodialed Calls. "Chavez v. Advantage Group, 2013 WL 4011006 (D. Colo. Aug. 5, 2013) - Specifically rejected analysis of Mais court, and found that consent was not, and could not effectively be withdrawn, as the TCPA does not provide for withdrawal of consent." [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

- "Kenny v. Mercantile Adjustment Bureau, 2013 WL 1855782 (W.D.N.Y. May 1, 2013) - Finding that there is no provision in the TCPA that allows withdrawal of a voluntarily given, prior express consent to call a cell number." [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]
- "Brenner v. American Education Services, 2014 WL 65370 (E.D.Mo. January 8, 2014) - As Plaintiff had voluntarily provided his cell phone number, and had specifically completed forms that included consent to be contacted via ATD, Plaintiff's case was dismissed." [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

## **Robert G. Cameron's Presentation Instructed NCHER To "Create Situations Where There Are Easy Facts To Support A Motion To Dismiss" Lawsuits Brought By Consumers.**

One Of Robert G. Cameron's Slides On "How Do We Comply With Current Standards?" Told NCHER To "Create Situations Where There Are Easy Facts To Support A Motion To Dismiss." [["NCHER Winter Legal Meeting TCPA Litigation Update. Robert G. Cameron,"](#) NCHER, accessed 11/27/19]

**While Robert G. Cameron Served As Their Deputy Chief Counsel, PHEAA Repeatedly Used "Claims Of Sovereign Immunity To**

**Avoid Lawsuits By State Regulators,” Even Attempting To Argue This Claim Before The U.S. Supreme Court—But, As One Judge Found, “Federal Courts Have Repeatedly Rejected PHEAA’s Assertion That It Shares Pennsylvania’s Sovereign Immunity.”**

**According To Senators Sherrod Brown (D-OH) And Patty Murray (D-WA), PHEAA Used “Claims Of Sovereign Immunity To Avoid Lawsuits By State Regulators” While Cameron Robert G. Cameron Served As Its Deputy Chief Counsel.**

**While Cameron Served As PHEAA’s Deputy Chief Legal Counsel, The Agency Used “Claims Of Sovereign Immunity To Avoid Lawsuits By State Regulators.”** In an October 9, 2019 letter to Robert G. Cameron, Senators Sherrod Brown (D-OH) And Patty Murray (D-WA) said, “Based on your prior work as Deputy Chief Counsel at the Pennsylvania Higher Education Assistance Agency (PHEAA), we have raised concerns about potential conflicts of interest that would prevent you from fully or effectively carrying out your duties as Ombudsman. We also have concerns about PHEAA’s claims of sovereign immunity to avoid lawsuits by state regulators during your tenure as Deputy Chief Legal Counsel. During your meeting with our staff, you detailed your prior work as Deputy Chief Counsel for PHEAA.” [[Press Release](#), U.S. Senate Committee on Banking, Housing, and Urban Affairs, accessed 10/15/19]

**In 2018, A Massachusetts Superior Court Judge Found That “Federal Courts Have Repeatedly Rejected PHEAA’s Assertion That It Shares Pennsylvania’s Sovereign Immunity” As He Struck Down PHEAA’s Motion To Dismiss A Lawsuit Over “Unfair And Deceptive Acts Against Massachusetts Student Loan Borrowers.”**

**The Commonwealth Of Massachusetts Sued PHEAA For “Allegedly Unfair And Deceptive Acts Against Massachusetts Student Loan Borrowers.”** The Commonwealth of Massachusetts has sued the Pennsylvania Higher Education Assistance Agency (PHEAA) for engaging in allegedly unfair and deceptive acts and practices against Massachusetts student loan borrowers. [...] The Commonwealth claims that PHEAA violated the federal Consumer Financial Protection Act and G.L. c. 93A by charging and collecting amounts not owed by borrowers, failing to process borrowers’ applications for income driven repayment plans in a timely and accurate manner, and failing to properly count borrowers’ qualifying payments under the Public Service Loan Forgiveness program.” [[Memorandum and Order Denying Defendant's Motion to Dismiss](#)," Massachusetts v. PHEAA, Case No. 1784CV02682]

**PHEAA Sought To Have The Lawsuit Dismissed “Out Of Respect For The Sovereign Immunity For The Commonwealth Of Pennsylvania.”** “PHEAA urges the Court to dismiss this action as a matter of comity, out of respect for the sovereign immunity of the Commonwealth of Pennsylvania.” [[Memorandum and Order Denying Defendant's Motion to Dismiss](#)," Massachusetts v. PHEAA, Case No. 1784CV02682]



**In February 2018, A Massachusetts Superior Court Judge Ruled That He "Is Not Convinced That PHEAA Is An Arm Of The Commonwealth Of Pennsylvania."** On February 28, 2018, Massachusetts Justice Of The Superior Court Kenneth W. Salinger Ruled, "PHEAA has moved to dismiss this action on several grounds. The Court will DENY this motion because it is not convinced that PHEAA is an arm of the Commonwealth of Pennsylvania and shares in its sovereign immunity [...] or that the United States Department of Education is an indispensable party." [[Memorandum and Order Denying Defendant's Motion to Dismiss](#)," Massachusetts v. PHEAA, Case No. 1784CV02682]

**The Judge Found That "Federal Courts Have Repeatedly Rejected" PHEAA's Claims Of Sovereign Immunity And Ruled That "PHEAA Is Not A State, An Arm Of A State, Or A Political Subdivision Of A State."** "Federal courts have repeatedly rejected PHEAA's assertion that it shares Pennsylvania's sovereign immunity from suit." [[Memorandum and Order Denying Defendant's Motion to Dismiss](#)," Massachusetts v. PHEAA, Case No. 1784CV02682]

- "This argument is unavailing because PHEAA is not a State, an arm of state, or a political subdivision of a State." [[Memorandum and Order Denying Defendant's Motion to Dismiss](#)," Massachusetts v. PHEAA, Case No. 1784CV02682]

### **While Robert G. Cameron Appears To Have Been Deputy Chief Counsel, PHEAA Tried And Failed To Have The Supreme Court Consider If The Agency Is "An Arm Of Pennsylvania For Purposes Of Federal Law."**

**In February 2016, PHEAA Filed To Have The Supreme Court Weigh Whether PHEAA "Is An Arm Of Pennsylvania For Purposes Of Federal Law"—The Supreme Court Denied To Review The Case.** In Pennsylvania Higher Education Assistance Agency v. Pele, the issue was "Whether the Pennsylvania Higher Education Assistance Agency, a statewide agency located in the capital and unambiguously treated as an arm of the state by Pennsylvania, is an arm of Pennsylvania for purposes of federal law, or is instead an 'independent political subdivision' as determined by the Fourth Circuit and its multifactor balancing test." [["Pennsylvania Higher Education Assistance Agency v. Pele," SCOTUSBlog](#), accessed 11/27/19]

- **PHEAA Filed A Writ Of Certiorari To Have The Supreme Court Hear This Case On February 16, 2016.** [[Petition for Writ of Certiorari](#), PHEAA v. Pele]
- **PHEAA's "Petition For Certiorari [Was] Denied On January 9, 2017."** [["Pennsylvania Higher Education Assistance Agency v. Pele," SCOTUSBlog](#), accessed 11/27/19]