



Thomas "Tom" B. Pahl

CFPB Policy Director for Research, Markets, and Regulations

Biography & Work Experience

Tom Pahl Holds A B.A. From The University Of St. Thomas (1985) And A J.D. From Northwestern University (1988). [[LinkedIn Profile for Thomas Pahl](#), LinkedIn, accessed 05/13/19]

Work Experience:

Dates	Position	Employer	Source
04/2018-Present	Policy Director for Research, Markets, and Regulations	Consumer Financial Protection Bureau	ACA International
02/2017-04/2018	Acting Director, Bureau of Consumer Protection	Federal Trade Commission	FTC Press Release
09/2016-02/2017	Partner	Arnall Golden Gregory LLP	Thomas Pahl LinkedIn Profile
02/2013-08/2016	Managing Counsel, Office of Regulations	Consumer Financial Protection Bureau	Thomas Pahl LinkedIn Profile
2008-2012	Adjunct Professor of Law	George Mason University School of Law	Thomas Pahl Resume
03/2007-01/2013	Assistant Director, Division of Financial Practices	Federal Trade Commission	Thomas Pahl LinkedIn Profile
05/2002-02/2007	Assistant Director, Division of Advertising Practice	Federal Trade Commission	Thomas Pahl LinkedIn Profile
02/2001-09/2001	Counsel	United States Judiciary Committee	Thomas Pahl LinkedIn Profile
04/1998-04/2002	Attorney Advisor, Office of Commissioner Orson Swindle	Federal Trade Commission	Thomas Pahl LinkedIn Profile
07/1996-03/1998	Associate	Gadsby Hannah LLP	Thomas Pahl LinkedIn Profile
1993-1996	Attorney Advisor, Office of	Federal Trade Commission	Thomas Pahl Resume

	Commissioner Mary Azeuenaga (Independent)		
1992-1993	Pro Bono Rule of Law Liaison	American Bar Association Central and Eastern European Law Initiative	Thomas Pahl Resume
1990-1993	Staff Attorney, Office of the General Counsel	Federal Trade Commission	Thomas Pahl Resume
1989-1990	Litigation Associate	Faegre & Benson	Thomas Pahl Resume
1988-1989	Judicial Clerk to Hon. D.D. Wozniak	Minnesota Court of Appeals	Thomas Pahl Resume

Memberships And Professional Affiliations:

Tom Pahl Is “A Member Of The Federalist Society.” [[“ETC Acting Chairman Ohlhausen Names Thomas Pahl Acting Director of the Agency’s Bureau of Consumer Protection,”](#) Federal Trade Commission, 02/08/17]

Tom Pahl Is An Editor For The Debt Collectors Compliance Professionals Forum. On his resume, Pahl lists “Editor, Editorial Review Board, Debt Collectors Compliance Professionals Forum.” [[Thomas Pahl Resume](#), *ProPublica*, accessed 05/13/19]

Tom Pahl Has Multiple Bar Memberships. The Bar Memberships in Thomas Pahl’s resume include the “District of Columbia Bar Association,” “United States District Court for the District of Columbia,” and the “American Bar Association.” [[Thomas Pahl Resume](#), *ProPublica*, accessed 05/13/19]

Tom Pahl Is The Trump CFPB’s Connection To The Debt Collection Industry

Tom Pahl Is Currently The CFPB’s Policy Associate Director For Research, Markets, And Regulations, A Political Position Created By Then-Director Mick Mulvaney As He Prioritized A Rulemaking On Debt Collection.

In April 2018, Tom Pahl Was Named The CFPB’s Policy Associate Director For Research, Markets, And Regulations, A Political Position

Created By Then-Director Mick Mulvaney To “Oversee [The] Debt Collection Rulemaking.”

Tom Pahl’s Position As Policy Associate Director for Research, Markets & Regulations “Is A Political Post” Created By Then-Acting Director Mick Mulvaney. “Tom Pahl has had the opportunity to make the regulatory rounds in recent years, uniquely preparing him for this moment. On Monday he returns to the Consumer Financial Protection Bureau (CFPB) as Policy Associate Director for Research, Markets & Regulations (RMR). He will report directly to Acting Director Mick Mulvaney. [...] Unlike Pahl's previous CFPB job as a career staffer, this latest job is a political post. In most federal agencies the top person, a political appointee, has a handful of positions available to bring in his or her own senior team. The Federal Trade Commission, for example, has nine such slots. The CFPB had none. Acting Director Mulvaney has created such positions and has hired individuals for those roles.” [Stephanie Eidelman, “[Tom Pahl Returns to CFPB, Will Oversee Debt Collection Rulemaking at Critical Juncture](#),” *insideARM*, 04/19/18]

At The Time, Then-Acting Director Mick Mulvaney “Said He Views Debt Collection Rulemaking As A Priority.” “Acting Director Mulvaney has said he views debt collection rulemaking as a priority. Given Pahl's many years of deep experience in this arena, we could expect him to be up to speed extremely quickly and help to make this priority a reality.” [Stephanie Eidelman, “[Tom Pahl Returns to CFPB, Will Oversee Debt Collection Rulemaking at Critical Juncture](#),” *insideARM*, 04/19/18]

Under Pahl, The CFPB Has Proposed A New Rule That Would Allow Debt Collectors To Send Consumers An Unlimited Number Of Texts And Emails.

In May 2019, The CFPB Proposed A Rule That Would Allow Debt Collectors To “Send Consumers Unlimited Amounts Of Texts And Emails.”

In May 2019, The CFPB Issued Its Proposed Debt Collection Rule That Would Allow Debt Collectors To “Send Consumers Unlimited Amounts Of Texts And Emails.” “The Consumer Financial Protection Bureau [...] proposed rules that would give the industry the go-ahead to send consumers unlimited amounts of texts and emails, accelerating a trend the watchdog bureau says could be beneficial for everyone.” [Renaë Merle, “[Trump administration wants to allow debt collectors to call 7 times a week and text, email as much as they want](#),” *The Washington Post*, 05/07/19]

Tom Pahl Was Previously An “In Demand” Lawyer For Debt Collectors, Working At A Law Firm Known For Its Effectiveness

In Helping Industry Actors “Resolve Pressing Issues Related To Regulation” And “Protect Their Businesses.”

While At Arnall Golden Gregory LLP, Tom Pahl Represented CFPB-Regulated Companies, Including “Consumer Reporting Agencies, Debt Collectors, Debt Buyers, [And] Creditors.”

Tom Pahl Represented “Consumer Reporting Agencies, Debt Collectors, Debt Buyers, Creditors And Other Consumer Financial Services Companies.” “Thomas B. Pahl, the former managing counsel at the Consumer Financial Protection Bureau, recently joined Arnall Golden Gregory LLP [...] He will focus on representing consumer reporting agencies, debt collectors, debt buyers, creditors and other consumer financial services companies in his practice. Pahl led efforts for rulemaking, policy development and regulatory guidance to implement the Fair Debt Collection Practices Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the Dodd-Frank Act and other regulatory requirements at the CFPB.” [[Former CFPB Managing Counsel Thomas Pahl Joins D.C. Law Firm](#),” ACA International, 09/22/16]

Tom Pahl Was “In Demand” Among Industry Law Firms Due To His Experience In “Law Governing Debt Collection And Credit Reporting.”

Tom Pahl Was “In Demand” Among Industry Law Firms Because Of His Experience With “Laws Governing Debt Collection And Credit Reporting.” “Pahl is in demand because he spent three and a half years as a managing counsel at the bureau, a creation of the 2010 Dodd-Frank financial regulatory law that has already levied \$12 billion in fines and penalties against firms that break the rules. Pahl was in the thick of it at the bureau, responsible for rulemaking, policy development and regulatory guidance to implement laws governing debt collection and credit reporting.” [“Veteran Consumer Finance Regulator Heads Downtown,” *Congressional Quarterly Magazine*, 11/11/16]

In 2016, Tom Pahl Left The CFPB To “Focus On Representing Consumer Reporting Agencies, Debt Collectors, Debt Buyers, Creditors And Other Financial Services Companies” As A Partner For Arnall Golden Gregory LLP (AGG).

In 2016, Debt Collection Trade Group ACA International Announced That Tom Pahl Was Leaving The CFPB And Joining Arnall Golden Gregory LLP (AGG) To “Focus On Representing Consumer Reporting Agencies, Debt Collectors, Debt Buyers, Creditors And Other Financial Services Companies In His Practice.” “Thomas B. Pahl, the former managing counsel at the Consumer Financial Protection Bureau, recently joined Arnall Golden Gregory LLP as a partner in the firm’s Washington, D.C., office, according to a news release on the firm’s website. He will focus on representing consumer reporting agencies, debt collectors, debt buyers, creditors and other consumer financial services companies in his practice.” [“Former CFPB Managing Counsel Thomas Pahl Joins D.C. Law Firm,” ACA International via Plus Media Solutions, 09/22/16]

Tom Pahl Was A Partner For AGG In Its Washington, D.C. Office. “Thomas B. Pahl, formerly Managing Counsel at the Consumer Financial Protection Bureau, has joined Arnall Golden Gregory LLP as a partner in the firm’s Washington, D.C., office.” [[Press Release](#), Arnall Golden Gregory LLP, accessed 12/02/19]

AGG Has Been Nationally Recognized For Its “Success In Helping Aspiring Businesses Resolve Pressing Issues Related To Regulation” And Touts Its “Deep Industry Knowledge” To Help Clients “Protect Their Businesses.”

AGG Was Recognized By *The National Law Journal* For Its “Success In Helping Aspiring Businesses Resolve Pressing Issues Related To Regulation.” “Arnall Golden Gregory was selected to *The National Law Journal's* prestigious ‘Midsize Hot List’ because of its success in helping aspiring businesses resolve pressing issues related to regulation, litigation, globalization, privacy and growth.” [[Press Release](#), Arnall Golden Gregory LLP, accessed 12/02/19]

AGG Claims That It Provides “Deep Industry Knowledge” And “Value To Help Clients Grow And Protect Their Businesses.” “With 160 attorneys in Atlanta and Washington, DC, AGG provides exceptional partner relationships, deep industry knowledge, flexible service, and value to help clients grow and protect their businesses and achieve their definition of success.” [[Press Release](#), Arnall Golden Gregory LLP, accessed 06/27/19]

While An Industry Lawyer, Tom Pahl Voiced The Concerns Of “People In Industry,” Claiming They Were “Very Concerned About The Extent Of The CFPB's Power And Frankly The Amount Of Money They Get When They Do Act.”

While In Private Law Practice, Tom Pahl Said His Clients Were “Very Concerned About The Extent Of The CFPB's Power And Frankly The Amount Of Money They Get When They Do Act.”

In November 2016, As Tom Pahl Was “Working With Clients Trying To Comply With The Rules,” He Said, “People Are Very Concerned About The Extent Of The CFPB's Power And Frankly The Amount Of Money They Get When They Do Act.” “Now he's working for clients trying to comply with the rules and there's high demand. ‘People are very concerned about the extent of the CFPB's power and frankly the amount of money they get when they do act,’ he says.” [“Veteran Consumer Finance Regulator Heads Downtown,” *Congressional Quarterly Magazine*, 11/11/16]

Tom Pahl Called The CFPB “Secretive,” And Said Industry Complained To Him, “We Have No Idea What The CFPB Is Doing And Why.”

Tom Pahl Reportedly Called The CFPB “Secretive” And Claimed “Firms Are Eager For Insight” Into Its Workings. “Firms are eager for insight into the bureau, in part, because it’s so secretive, Pahl contends. Pahl blames that secrecy on Congress, where Republicans have raised a constant battle against the bureau’s initiatives and its very existence since they took control of Congress in 2011.” [“Veteran Consumer Finance Regulator Heads Downtown,” *Congressional Quarterly Magazine*, 11/11/16]

Tom Pahl Sympathized With “People In Industry” Who Complained, “We Have No Idea What The CFPB Is Doing And Why, And We Can Barely Respond To Them, We Don’t Even Know If They’re Paying Attention To Us.” “That’s something that I would hope that the CFPB would get to the point where it is not so much in the political crosshairs that they can’t move on to be a little more transparent and open and talk about what they’re doing,’ Pahl says. ‘One of the things that I hear a lot from people in industry is we have no idea what the CFPB is doing and why, and we can barely respond to them, we don’t even know if they’re paying attention to us. Typically, the CFPB actually is paying attention but nobody’s going to know that unless you explain what you’re doing.’” [“Veteran Consumer Finance Regulator Heads Downtown,” *Congressional Quarterly Magazine*, 11/11/16]

Tom Pahl Has Railed Against Debt Collection Consumer Protection Rule Efforts And Argued That The CFPB “Should Abandon These Efforts As An Exercise In ‘Regulatory Humility.’”

Tom Pahl Has Opposed CFPB Limitations Against How Many Times Debt Collectors Can Contact Consumers, Arguing The Bureau Should “Should Abandon These Efforts As An Exercise In ‘Regulatory Humility.’”

Tom Pahl Opposed CFPB Limits On How Many Times Debt Collectors Can Contact Consumers, Arguing That The Bureau “Should Abandon These Efforts As An Exercise In ‘Regulatory Humility.’” “ In January of 2017 Tom Pahl wrote a piece opposed to CFPB limiting the number of times debt collectors may contact consumers titled “Collector Contact Caps and the Application of ‘Regulatory Humility.’” Responding to a recent CFPB announcement that it was “considering proposing rules that would mandate specific numerical limits on communications through all methods between debt collectors and consumers,” Pahl said that the bureau “should abandon these efforts as an exercise in ‘regulatory humility.’” [Thomas Pahl, “[Collector Contact Caps and the Application of ‘Regulatory Humility.’](#)” *insideARM*, 01/30/17]

Tom Pahl Has Argued That States, Not The CFPB, Should Have “Primary Oversight” Over Attorneys In Debt Collection Litigation.

Tom Pahl Has Argued That States, And Not The CFPB, Should Had “Primary Oversight” Over Aspects Of Debt Collection Litigation. In December of 2017 Tom Pahl wrote a piece opposed to CFPB regulating debt collection litigation titled, "Why States Should Have Primary Oversight of Attorney’s Activities in Debt-Collection Litigation." He said that the CFPB's work on debt collection "may impose even more extensive and complicated requirements to flesh out meaningful involvement, substantiation, and other FDCPA [Fair Debt Collection Practices Act] concepts for representations made in complaints." He claimed that applying "FDCPA standards and state court and state bar standards at the same time to the representations in complaints risks conflict and confusion that will make it harder for collection litigation attorneys to comply with the law." [Thomas Pahl, "[Why States Should Have Primary Oversight of Attorney’s Activities in Debt-Collection Litigation](#)," *insideARM*, 12/14/18]

Tom Pahl Wrote An Opinion Piece On How Under Trump, “The CFPB’s Rulemaking Frenzy Is Likely To Stop.”—In It, He Echoed Industry Complaints That Previous CFPB Actions On Debt Collection, Payday, And Other Lines Of Business Would “Fundamentally Change Those Industries.”

Tom Pahl Wrote An Opinion Piece On “The Greatest Changes We Are Likely To See In Consumer Financial Protection When Trump-Appointed Leadership Arrives.”

Before Donald Trump Was Sworn Into Office, Tom Pahl Wrote An Opinion Piece On “Three Of The Greatest Changes We Are Likely To See In Consumer Financial Protection When Trump-Appointed Leadership Arrives.” “While the nature of the changes in approach, agenda and priorities at the CFPB and the FTC depends on who is chosen to run them, it is safe to assume that new leadership will share President-elect Trump’s free-market and less-regulatory views. With that being said, here are three of the greatest changes we are likely to see in consumer financial protection when Trump-appointed leadership arrives.” [Thomas Pahl, "[Consumer financial protection will remain alive under Trump](#)," *The Hill*, 12/13/16]

Tom Pahl Said That Under Trump, “The CFPB’s Rulemaking Frenzy Is Likely To Stop.”

Under The Trump Administration, Tom Pahl Said, “The CFPB’s Rulemaking Frenzy Is Likely To Stop.” “First, the CFPB’s rulemaking frenzy is likely to stop. Over the course of its five years of operation, the agency has issued many new regulations. For example, its rules affecting mortgage origination, disclosures and servicing have fundamentally reworked mortgage markets.” [Thomas Pahl, "[Consumer financial protection will remain alive under Trump](#)," *The Hill*, 12/13/16]

Tom Pahl Claimed That The CFPB's Rulemakings On Debt Collection And Other Sectors Would "Fundamentally Change Those Industries."

Tom Pahl Claimed That The CFPB's Pending Rulemakings On Debt Collection And Other Financial Sectors Would "Fundamentally Change Those Industries." "The CFPB has pending rulemakings concerning payday loans, arbitration and debt collection that would fundamentally change those industries as well. The agency also has expressed a long-term interest in making rules on other topics, such as student loan servicing and credit reporting." [Thomas Pahl, "[Consumer financial protection will remain alive under Trump](#)," *The Hill*, 12/13/16]

Tom Pahl's Article Echoed Industry Complaints About The "Burden, Complexity And Length" Of Rules, As Well As The CFPB's Established Practice Of Scrutinizing Industry "Abusiveness" And Engaging In "Rulemaking By Settlement."

Tom Pahl Cited "Industry Complaints About The Burden, Complexity And Length Of The CFPB's Previously Issued And Proposed Regulations." "Given industry complaints about the burden, complexity and length of the CFPB's previously issued and proposed regulations, new agency leadership likely will undertake a rigorous and comprehensive reassessment of those regulations." [Thomas Pahl, "[Consumer financial protection will remain alive under Trump](#)," *The Hill*, 12/13/16]

Tom Pahl Suggested That The CFPB Was Relying Too Heavily On The Consumer Protection Theory Of Abusiveness, Arguing That "Financial Firms Have Expressed Continued And Serious Concerns About The Vagueness Of The New Concept Of Abusiveness." "Second, new CFPB leadership likely will use more well-established consumer protection theories like deception and unfairness instead of abusiveness. [...] Financial firms have expressed continued and serious concerns about the vagueness of the new concept of abusiveness. New CFPB leadership is likely to de-emphasize or discontinue the use of its abusiveness authority, focusing instead on using its deception and unfairness authority." [Thomas Pahl, "[Consumer financial protection will remain alive under Trump](#)," *The Hill*, 12/13/16]

Tom Pahl Cited Industry Criticism Of "Rulemaking By Settlement" Under Former Director Richard Cordray. "CFPB Director Richard Cordray has stressed that all members of industry should comply with the settlement agreements the agency negotiates with individual firms, describing it as 'compliance malpractice' not to do so. The industry has been very critical of the CFPB's approach because many of the requirements in settlement agreements are tailored to the specific company and therefore are not suitable as general requirements for all members of an industry. New agency leadership is likely to discontinue what many have criticized as CFPB rulemaking by settlement agreement." [Thomas Pahl, "[Consumer financial protection will remain alive under Trump](#)," *The Hill*, 12/13/16]

Thomas Pahl Is A “Prominent Advocate Of Deregulation,” Calling The Trump Administration’s Regulatory Moratorium A “Much-Needed Pause” And Arguing That Industry Should “Assist In Identifying Rules That Are Most Important To Change.”

Tom Pahl Is “Prominent Advocate Of Deregulation.”

Tom Pahl Has Been Characterized As A “Prominent Advocate Of Deregulation” With A “Pentchant For Free-Market And Deregulatory Policies.” “The acting chairman of the Federal Trade Commission (FTC) on Wednesday selected a lawyer and prominent advocate of deregulation to lead the agency’s Bureau of Consumer Protection. [...] Pahl has also expressed his own penchant for free-market and deregulatory policies.” [Ali Breland, “[Deregulation supporter named head of FTC consumer protection bureau](#),” *The Hill*, 02/08/17]

Tom Pahl Wrote In Support Of The Trump Administration’s “Regulatory Moratorium,” Calling It A “Much-Needed Pause.”

Tom Pahl Believes That “Trump’s Regulatory Moratorium” Is A “Much-Needed Pause.” Pahl wrote, “I therefore agree that President Trump’s regulatory moratorium on the executive branch and other agencies provides a much-needed pause to make sure they are not advanced without adequate inquiry.” [Thomas Pahl, “[The tortoise, not the hare, will win the deregulation race](#),” *The Hill*, 02/02/17]

Tom Pahl Said That “Industry Can Assist In Identifying Rules That Are Most Important To Change” As Part Of The Trump Administration’s Deregulatory Efforts.

Tom Pahl Wrote That The Trump Administration Will “Need Help” With Undoing Regulations That Are “Incredibly Long And Complicated” So He Thinks “Industry Can Assist In Identifying Rules That Are Most Important To Change.” Pahl wrote, “the regulations which impose the greatest costs are not likely to be such low hanging fruit. Many of these regulations are incredibly long and complicated. [...] President Trump’s appointees undoubtedly will move as quickly as they can, and they are going to need help. Industry can assist in identifying rules that are the most important to change. Think tanks, academics, and others can do the same.” [Thomas Pahl, “[The tortoise, not the hare, will win the deregulation race](#),” *The Hill*, 02/02/17]

While At The Federal Trade Commission (FTC) In 2017, Tom Pahl Said He Worked To “Reduce Unnecessary And Undue Burdens On Industry Associated With Investigations, Regulations, And Orders.”

In A 2017 Speech To An Auto Dealer Trade Group, Tom Pahl Said He Worked To Reduce Regulatory Burden For Industry In Regards to “Investigations, Regulations, And Orders.”

During A Speech At The 2017 National Independent Automobile Dealers Association (NIADA) National Policy Conference, Tom Pahl Stated That He And The FTC Were “Working To Reduce Unnecessary And Undue Burdens On Industry Associated With Investigations, Regulations, And Orders.” “The final thing we’re really working to do as part of an overall approach to consumer protection is working to reduce unnecessary and undue burdens on industry associated with investigations, regulations, and orders. For example, last July one of the things folks in my shop did is we have completely modified and overhauled our process for civil investigative demands, to try and streamline them so they’re less burdensome for businesses who receive them, make them shorter in duration so it’s less costly for people to respond to them.” [[“2017 NPC - Tom Pahl FTC,”](#) NIADA via YouTube, 10/03/17 (1:50)]

Tom Pahl Served As Editor For A Debt Collection Industry Group Dedicated To Helping Members “Navigate The Complex And Fast Changing World Of Regulatory Oversight.”

Tom Pahl Has Served As An Editor For The Debt Collectors Compliance Professionals Forum.

Tom Pahl Has Served As An Editor For The Debt Collectors Compliance Professionals Forum. On his resume, Pahl lists “Editor, Editorial Review Board, Debt Collectors Compliance Professionals Forum.” [[Thomas Pahl Resume,](#) Pro Publica, accessed 12/02/19]

The Compliance Professionals Forum Is An Industry Organization Dedicated To Helping “Compliance Professionals Navigate The Complex And Fast Changing World Of Regulatory Oversight.”

The Compliance Professionals Forum Is A “Membership Organization That Helps Compliance Professionals Navigate The Complex And Fast Changing World Of Regulatory Oversight.” “The Compliance Professionals Forum (CPF) is a membership organization that helps compliance professionals navigate the complex and fast changing world of regulatory oversight. If you have responsibility for compliance related to communicating with consumers about a debt, the CPF is your compass.” [[“Compliance Professionals Forum,”](#) insideARM, accessed 12/02/19]

The Compliance Professionals Forum Was Launched By The iA Institute, An Industry Entity And “Publisher Of insideARM.com,” In January 2015. “The iA Institute (publisher of insideARM.com) [...] announced the launch of the Compliance Professionals Forum (CPF), a membership organization for those tasked to ensure compliance with regulations governing interactions with consumers who owe a debt. [...] CPF offers professional peer groups, peer-

reviewed articles and whitepapers, in-depth guides, checklists, model documents, webinars, and in-person best practice events designed to educate and support those who are new to the compliance field, as well as those who are seasoned professionals.” [Patrick Lunsford, “[insideARM Publisher Launches Compliance Professionals Forum](#),” *insideARM*, 01/13/15]

- **“The iA Institute (iA) Produces Handcrafted News, Education, Events And Connection For The Consumer And Commercial Credit & Collections Industry.”** [[“About iA](#),” the iA Institute, accessed 11/12/19]

Tom Pahl Is “A Frequent Speaker” At Events Hosted By ACA International, A Leading Debt Collection Industry Group That Has Spent \$1.7 Million On Federal Lobbying Since Trump Took Office.

Tom Pahl Is “A Frequent Speaker” At Events Hosted By ACA International, “The Largest Trade Group For The Debt Collection Industry.”

Tom Pahl Is “A Frequent Speaker” At Events Hosted By ACA International. “As a frequent speaker at ACA events, Pahl also appeared at ACA International’s Washington Insights Conference in both 2015 and 2016 and shared insights into the CFPB’s approach to developing rules to regulate the accounts receivable management industry, as well as debt collection research conducted by the CFPB to inform its decision making.” [[“Thomas Pahl to Return to CFPB’s Rulemaking Division](#),” ACA International, 04/18/18]

- **ACA International Is “The Largest Trade Group For The Debt Collection Industry.”** “ACA International, the largest trade group for the debt collection industry, represents approximately 2,500 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, who employ more than 129,000 employees worldwide.” [[“ACA International Fact Sheet](#),” ACA International, January 2019]

In May 2019, Tom Pahl Was A Featured Speaker At ACA International’s 2019 “Washington Insights Fly-In.”

Tom Pahl Was A Featured Speaker At ACA International’s 2019 Washington Insights Fly-In That Took Place May 14-16, 2019. [[“Washington Insights Speakers](#),” ACA International, accessed 07/01/19]

In May 2018, Tom Pahl And Then-CFPB Director Mick Mulvaney Were Featured Speakers At ACA International’s “Washington Insights Conference.”

Tom Pahl Was A Featured Speaker At ACA International's 2018 "Washington Insights Conference" That Took Place May 21-23, 2018. "Mulvaney and Pahl are speakers at ACA International's upcoming Washington Insights Conference, May 21-23. Members will greatly benefit from their insights on the FTC, CFPB and regulations for the accounts receivable management industry." [[Thomas Pahl to Return to CFPB's Rulemaking Division](#)," ACA International, 04/18/18]

In Both 2015 And 2016, Tom Pahl Was A Featured Speaker At ACA International's "Washington Insights Conference."

Tom Pahl Was A Featured Speaker At Both ACA International's 2015 And 2016 Washington Insights Fly-Ins. "As a frequent speaker at ACA events, Pahl also appeared at ACA International's Washington Insights Conference in both 2015 and 2016 and shared insights into the CFPB's approach to developing rules to regulate the accounts receivable management industry, as well as debt collection research conducted by the CFPB to inform its decision making." [[Thomas Pahl to Return to CFPB's Rulemaking Division](#)," ACA International, 04/18/18]

In November 2011, Tom Pahl Led A Session At ACA International's "Fall Forum," Where He Claimed That The Fair Debt Collection Practices Act Was Intended "To Be Enforced Primarily By Private Actions Rather Than Through Government Enforcement."

In November 2011, Tom Pahl Led A Session On "The FTC's Enforcement Priorities Related To The Collection Industry" At ACA International's 2011 Fall Forum. "ACA International's 2011 Fall Forum conference brought together credit and collection professionals in Chicago. The event took place Nov. 9-11, 2011, with nearly 400 ACA members gathering for three days of education and networking. [...] In a session led by Thomas Pahl, assistant director of the Federal Trade Commission's Division of Financial Practices, attendees learned about the FTC's enforcement priorities related to the collection industry." [[Fall Forum Takes Chicago \[Collector\]](#)," *Insurance News Net*, 01/02/12]

- **At The Event, Pahl Spoke About The "Value The Debt Collection Industry" Brings To The Economy And Claimed That The Fair Debt Collection Practices Act Was Intended "To Be Enforced Primarily By Private Actions Rather Than Through Government Enforcement."** "Pahl noted the FTC realizes the value the debt collection industry, working in compliance with the Fair Debt Collection Practices Act, brings to the American economy. [...] Pahl also addressed the future relationship between the FTC and the Consumer Financial Protection Bureau as it relates to collection industry oversight. He pointed out that when the FDCPA was originally passed, Congress intended for it to be enforced primarily by private actions rather than through government enforcement." [[Fall Forum Takes Chicago \[Collector\]](#)," *Insurance News Net*, 01/02/12]

In 2017, ACA International Spent \$390,000 Lobbying Congress.

In The First Quarter Of 2017, ACA International Spent \$90,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/17/17]

In The Second Quarter Of 2017, ACA International Spent \$90,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/12/17]

In The Third Quarter Of 2017, ACA International Spent \$130,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/17]

In The Fourth Quarter Of 2017, ACA International Spent \$80,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/18/18]

In 2018, ACA International Spent \$690,000 Lobbying Congress, The Treasury Department, The CFPB, The FTC, And The FCC.

In The First Quarter Of 2018, ACA International Spent \$120,000 Lobbying Congress. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/18]

In The Second Quarter Of 2018, ACA International Spent \$190,000 Lobbying Congress, The CFPB, The FTC, And The FCC. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/20/18]

In The Third Quarter Of 2018, ACA International Spent \$200,000 Lobbying Congress, The Treasury Department, The CFPB, The FTC, And The FCC. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/19/18]

In The Fourth Quarter Of 2018, ACA International Spent \$180,000 Lobbying Congress, The Treasury Department, The CFPB, The FTC, And The FCC. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/18/19]

So Far In 2019, ACA International Has Spent \$620,000 Lobbying Congress, The Treasury Department, The SBA, The FTC, And The FCC.

In The First Quarter Of 2019, ACA International Spent \$190,000 Lobbying Congress, The Treasury Department, The SBA, The FTC, And The FCC. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/16/19]

In The Second Quarter Of 2019, ACA International Spent \$190,000 Lobbying Congress, The Treasury Department, FTC, FCC, And The SBA. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/19]

In The Third Quarter Of 2019, ACA International Spent \$240,000 Lobbying Congress, The Treasury Department, FTC, FCC, And The SBA. [[ACA International LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/16/19]

Tom Pahl Has Repeatedly Appeared At Events Held By The Receivables Management Association International (RMAI), A Debt Collection Trade Group That Has Spent Over \$600,000 On Federal Lobbying Since Trump Took Office.

In July 2019, Tom Pahl Was Scheduled To Speak At An “Intimate Gathering” Of Industry Insiders An Upcoming “Executive Summit” Of The Receivables Management Association International (RMAI), A Debt Collection Industry Group.

Tom Pahl Will Speak At RMAI’s Executive Summit On July 31 At 1:50 PM In A Session Titled “A Conversation With Our Federal Regulators.” [[2019 Executive Summit Agenda](#), Receivables Management Association International, accessed 06/25/19]

- **RMAI Is Hosting Its 2019 Executive Summit, An “Intimate Gathering Of 125 Professionals,” From July 30 To August 1 In Sedona, Arizona.** From July 30 To August 1 In Sedona, Arizona, RMAI will be holding an “intimate gathering of 125 professionals provides attendees the opportunity to network with other executives, have conversations with policymakers, and receive education on executive-level operations.” [[2019 Executive Summit](#), Receivables Management Association International, accessed 06/25/19]

RMAI Is A Debt Collection Industry Trade Group That “Represents More Than 575 Companies That Purchase Performing And Nonperforming Receivables On The Secondary Market.” “Receivables Management Association is the nonprofit trade association that represents more than 575 companies that purchase performing and nonperforming receivables on the secondary market.” [[DBA International is now Receivables Management Association](#),” *insideARM*, 02/09/17]

In February 2018, Tom Pahl Was A Featured Speaker At RMAI’s Annual Conference.

Tom Pahl Was A Featured Speaker At The 2018 RMAI Annual Conference In Las Vegas On February 7, 2018, Speaking On “Updates, Forecasts, And Financial Services: An In-Depth Discussion With The FTC.” [[RMAI 2018 Annual Conference Agenda](#), Receivables Management Association International, accessed 07/01/19]

In 2017, RMAI Spent \$200,000 Lobbying Congress, The CFPB, The Treasury Department, The OCC, And The FTC.

In The First Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, And The FTC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/21/17]

In The Second Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, The FTC, And The OCC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/17]

In The Third Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, The FTC, And The OCC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/17/17]

In The Fourth Quarter Of 2017, RMAI Spent \$50,000 Lobbying Congress, The CFPB, The FTC, And The OCC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/20/18]

In 2018, RMAI Spent \$220,000 Lobbying Congress, The Treasury Department, The CFPB, And The FTC.

In The First Quarter Of 2018, RMAI Spent \$50,000 Lobbying Congress, The Treasury Department, The CFPB, And The FTC. [[K&L Gates LLP](#), U.S. Senate Lobbying Disclosure Act Database, 04/18/18]

In The Second Quarter Of 2018, RMAI Spent \$60,000 Lobbying Congress, The Treasury Department, The CFPB, And The FTC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/18/18]

In The Third Quarter Of 2018, RMAI Spent \$60,000 Lobbying Congress, The CFPB, And The FTC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/20/18]

In The Fourth Quarter Of 2018, RMAI Spent \$50,000 Lobbying Congress, The CFPB, And The FTC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 01/19/19]

So Far In 2019, RMAI Has Spent \$190,000 On Federal Lobbying.

In The First Quarter Of 2019, RMAI Spent \$60,000 Lobbying Congress, The CFPB, And The FTC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 04/19/19]

In The Second Quarter Of 2019, RMAI Spent \$60,000 Lobbying Congress And The FTC. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 07/19/19]

In The Third Quarter Of 2019, RMAI Spent \$70,000 Lobbying Congress. [[K&L Gates LLP LD-2 Disclosure Form](#), U.S. Senate Lobbying Disclosure Act Database, 10/18/19]