

POLICY & COMPLIANCE TRACK: CFPB Insights and Updates

Wednesday, February 18, 2026

Moderator:

Jonathan Kolodziej, Partner, Bradley

Panelists:

Elana Babinecz, Shareholder, Baker Donelson

Revathi Jose, Vice President & Assistant General Counsel, JP Morgan Chase Bank

Fed Kamensky, Partner, Weiner Brodsky Kider PC

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Meet the Panelists



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CFPB Year in Review



Jonathan McKernan
Nominee #1



Russ Vought
Acting Director



Stuart Levenbach
Nominee #2

CFPB: Year in Review

- Efforts to “shut down” the Bureau
- April 16, 2025 memo to CFPB Staff
- May 12, 2025: Withdrawal of 67 guidance documents
- Funding controversy
 - CFPB now has \$145M for 2Q FY26

CFPB: Year in Review



1700 G Street NW, Washington, D.C. 20552

April 16, 2025

TO CFPB Staff

FROM Mark R. Paoletta
Chief Legal Officer

SUBJECT 2025 SUPERVISION AND ENFORCEMENT PRIORITIES

This document sets out the Bureau's supervision and enforcement priorities. The Bureau will focus its enforcement and supervision resources on pressing threats to consumers, particularly service members and their families, and veterans. To focus on tangible harms to consumers, the Bureau will shift resources away from enforcement and supervision that can be done by the States. All prior enforcement and supervision priority documents are hereby rescinded.

1. To avoid the ever-increasing number of supervisory exams, which are multiplying the cost of running businesses and raising consumer prices, Supervision shall decrease the overall number of "events" by 50%. The focus should be on conciliation, correction, and remediation of harms subject to consumers' complaints. Supervision should focus on collaborative efforts with the supervised entities to resolve problems so that there are measurable benefits to consumers.
2. The Bureau's focus will shift back to depository institutions, as opposed to non-depository institutions. In 2012, 70% of the Bureau's supervision focused on banks and depository institutions and 30% on nonbanks. Now that proportion has completely flipped, with over 60% on nonbanks and less than 40% on banks and depository institutions. The Bureau must seek to return to the 2012 proportion and focus on the largest banks and depository institutions.
3. The Bureau will focus on actual fraud against consumers, where there are identifiable victims with material and measurable *consumer damage*, as opposed to matters based on the Bureau's perception that consumers made "wrong" choices. The areas of priorities are:
 - a. Mortgages (getting the highest priority).

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- b. FCRA/Reg V data furnishing violations.
 - c. FDCCA/Reg F relating to consumer contracts/debts.
 - d. Various fraudulent overcharges, fees, etc.
 - e. Inadequate controls to protect consumer information resulting in actual loss to consumers.
4. The Bureau will focus on redressing tangible harm by getting money back directly to consumers, rather than imposing penalties on companies in order to simply fill the Bureau's penalty fund.
 5. The Bureau will focus on providing redress to service members and their families, and veterans.
 6. The Bureau will respect Federalism:
 - a. The Bureau will deprioritize participation in multi-state exams unless required by statute (rather than merely permitted).
 - b. The Bureau will deprioritize supervision where States have and exercise ample regulatory and supervisory authority, unless required by statute (rather than merely permitted).
 - c. The Bureau will minimize duplicative enforcement, where State regulators or law enforcement authorities are currently engaged in or have concluded an investigation into the same matter.
 7. The Bureau will respect other federal agencies' regulatory ambit:
 - a. The Bureau will eliminate duplicative supervision or supervision outside of the Bureau's authority (e.g., no supervision of M&A, just because regulated entities are involved, or attempt to insert itself into bankruptcy supervision).
 - b. To the extent feasible, the Bureau will coordinate exams' timing with other/primary federal regulators.
 - c. The Bureau will minimize duplicative enforcement, where another federal regulator is currently engaged in or has concluded enforcement.
 8. The Bureau will not pursue supervision under novel legal theories, including of the Bureau's authority. It will focus on areas that are clearly within its statutory authority.
 9. The Bureau will not engage in or facilitate unconstitutional racial classification or discrimination in its enforcement of fair lending law:
 - a. The Bureau will not engage in redlining or bias assessment supervisions or enforcement based solely on statistical evidence and/or stray remarks that may be susceptible to adverse inferences.
 - b. The Bureau will pursue only matters with proven actual intentional racial discrimination and actual identified victims. Such matters shall be brought to the leadership's attention and maximum penalties will be sought.

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10. The Bureau will deprioritize the following:
 - a. Loans or other initiatives for "justice involved" individuals (criminals).
 - b. Medical debt.
 - c. Peer-to-peer platforms and lending.
 - d. Student loans.
 - e. Remittances.
 - f. Consumer data.
 - g. Digital payments.
11. The Bureau's primary consumer enforcement tools are its disclosure statutes. The Bureau shall not engage in attempts to create price controls.

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CFPB Rulemaking

Rulemaking

Agency Rule List - Spring 2025

Consumer Financial Protection Bureau

Agency	Agenda Stage of Rulemaking	Title	RIN
CFPB	Prerule Stage	Unfair, Deceptive, or Abusive Acts and Practices	3170-AA88
CFPB	Prerule Stage	Identity Theft and Coerced Debt (Regulation V)	3170-AB36
CFPB	Prerule Stage	Loan Originator Compensation Requirements Under the Truth in Lending Act (Regulation Z); Rescission	3170-AB46
CFPB	Prerule Stage	Discretionary Servicing Rules under the Real Estate Settlement Procedures Act (Regulation X)	3170-AB48
CFPB	Prerule Stage	Discretionary Mortgage Servicing Rules Under the Truth in Lending Act (Regulation Z)	3170-AB49
CFPB	Prerule Stage	Defining Larger Participants of the Automobile Financing Market	3170-AB50
CFPB	Prerule Stage	Defining Larger Participants of the Consumer Debt Collection Market	3170-AB51
CFPB	Prerule Stage	Defining Larger Participants of the Consumer Reporting Market 2025	3170-AB52
CFPB	Prerule Stage	Defining Larger Participants of the International Money Transfer Market	3170-AB53
CFPB	Proposed Rule Stage	Registry of Nonbank Covered Persons Subject to Certain Agency and Court Orders; Proposed Rescission	3170-AB32
CFPB	Proposed Rule Stage	Rules of Practice for Adjudication Proceedings; Rescission	3170-AB33
CFPB	Proposed Rule Stage	Procedures for Supervisory Designation Proceedings	3170-AB34
CFPB	Proposed Rule Stage	Payday, Vehicle, Title, and Certain High-Cost Installment Loans Reconsideration	3170-AB38
CFPB	Proposed Rule Stage	Personal Financial Data Rights Reconsideration	3170-AB39
CFPB	Proposed Rule Stage	Small Business Lending Data Collection Under the Equal Credit Opportunity Act Reconsideration	3170-AB40
CFPB	Proposed Rule Stage	Procedures for Guidance Documents	3170-AB41
CFPB	Proposed Rule Stage	Procedures for Periodic Review of Bureau Regulations	3170-AB44
CFPB	Proposed Rule Stage	Legal Standard Applicable to Supervisory Designation Proceedings	3170-AB45
CFPB	Proposed Rule Stage	Equal Credit Opportunity Act (Regulation B)	3170-AB54
CFPB	Final Rule Stage	Streamlining Mortgage Servicing for Borrowers Experiencing Payment Difficulties (Regulation X)	3170-AB04
CFPB	Final Rule Stage	Financial Data Transparency Act	3170-AB20
CFPB	Final Rule Stage	Remittance Transfers Under the Electronic Fund Transfer Act (Regulation E)	3170-AB28
CFPB	Final Rule Stage	Protections for Borrowers Affected by the COVID-19 Emergency Under the Real Estate Settlement Procedures Act (RESPA), Regulation X, Rescission	3170-AB42
CFPB	Final Rule Stage	Rescission of State Official Notification Rules	3170-AB43

Regulation X



Regulation X – 2024 Proposed Rule

New proposed framework:

- Early intervention and continuity of contact remain largely the same
- “Request for Loss Mitigation Assistance” → “Loss Mitigation Review Cycle”
- Protections:
 - Fee suppression
 - No beginning or advancing the foreclosure process
- Off-ramps / Foreclosure procedural safeguards:
 - Borrower becomes current
 - No remaining loss mitigation options
 - Unresponsive borrower – 90 days
- Determination notice for offers (including unsolicited offers) and denials
- Appeals for offers and denials

Regulation X – Potential Rescission

View Rule

[View EO 12866 Meetings](#)

[Printer-Friendly Version](#)

[Download RIN Data in XML](#)

CFPB

RIN: 3170-AB48

Publication ID: Spring 2025

Title: •Discretionary Servicing Rules under the Real Estate Settlement Procedures Act (Regulation X)

Abstract:

In 2013, the Consumer Financial Protection Bureau (CFPB) issued a final rule to implement provisions of the Dodd-Frank Act relating to mortgage loan servicing. As part of that rulemaking, the CFPB adopted various provisions pursuant to the CFPB's discretionary authorities under the Real Estate Settlement Procedures Act. Those discretionary provisions, which the CFPB has amended periodically, include requirements relating to servicer policies and procedures, early intervention with delinquent borrowers, continuity of contact, and procedures for evaluating and responding to loss mitigation applications. The CFPB is issuing an Advance Notice of Proposed Rulemaking to solicit comments and information to help the CFPB assess the costs and benefits of those discretionary provisions for the purpose of determining whether the CFPB should amend or rescind those provisions.

Language Access

Language Access

- Though the CFPB did not provide any proposed regulatory text, proposed rule contemplates significant interpretation and translation requirements.
- Requirements apply to certain “specified written communications” and “specified oral communications”
 - Generally speaking, these communications are the written notice and verbal contact requirements under the early intervention, continuity of contact, and loss mitigation sections of Regulation X.
- Most significant components:
 1. Specified written communications must be translated into Spanish and provided to all borrowers along with English version
 2. Specified written and oral communications must be translated/interpreted into five servicer-selected additional languages and provided to borrowers upon request
 3. “[I]f a borrower received marketing for their mortgage loan before origination in a language other than English, and the servicer knows or should have known of that marketing, the servicer must comply with the translation and interpretation service requirements . . . for that language.”

Interpretive Rule

FCRA; Preemption of State Laws

Continued Focus on Accuracy of Reported Information?

New Priorities:

- CFPB identified **data furnishing** as an “area of priority.” This follows “**mortgages**,” listed as “highest priority”
- **Accuracy** of reported info and **dispute investigation** have long been a focal point of CFPB—seems consistent with new stated focus on **actual harm** to consumers with identifiable **victims** and **real damages**
- But what about prior guidance? Withdrawal of 67+ prior docs included FCRA-related guidance
 - But where the law has **not** changed, **cannot stop complying** with the requirements

Examples of Withdrawn Prior Guidance:

- CFPB Circular 2022-07 (Nov. 10, 2022)—focus on requirement to **reasonably investigate** disputes
 - Furnishers **may not require** consumers to provide info or docs as a condition for investigating a dispute **beyond what FCRA allows**
 - For direct disputes, furnishers can require supporting documentation **reasonably necessary** to substantiate the dispute. 12 CFR § 1022.43(d)(3).
 - E.g.: identity theft affidavit vs. preferred intake forms or documentation in specific format
- CFPB Bulletin 2013-09 (Sept. 4, 2013)—addressed furnisher obligation to **review all relevant information** regarding disputes, including (for indirect disputes):
 - **All relevant information** transmitted by CRA, and furnisher’s own information
 - CFPB expects furnishers to have **reasonable systems** to receive and process notices of dispute from CRAs

Interpretive Rule – FCRA; Preemption of State Laws

July 22, 2022 Interpretive Rule:

- Found that FCRA preemption has “a narrow sweep” and “does not preempt all State laws relating to the content or information contained in consumer reports.”
- The interpretive rule specifically identified a number of areas in which states could regulate: medical debt, evictions, arrest records, or rental arrears

May 12, 2025 Withdrawal of Guidance:

- Withdrawal included the 2022 interpretive rule
- Committed the CFPB to only issuing guidance where that guidance is necessary and would reduce compliance burdens rather than increase them.

Oct. 28, 2025 Interpretive Rule:

- Confirms the withdrawal of the 2022 interpretive rule
 - Cites to *Loper Bright*: “courts are the ultimate arbiters of statutory meaning.”
 - “Parties understand that guidance, including the 2022 rule, is non-binding. Parties interested in the application of FCRA preemption to particular State laws can litigate such questions in court.”
- “the Bureau now clarifies that its prior interpretation was manifestly wrong. The 2022 interpretive rule contradicted the plain text of section 1681t(b)(1), ignored the legislative history of the preemption clause, and reflected a misguided policy choice that would undermine the credit reporting system and credit markets.”

CFPB/DOJ Joint Statement on Fair Lending and Credit Opportunities for Noncitizen Borrowers

CFPB/DOJ Joint Statement on Fair Lending and Credit Opportunities for Noncitizen Borrowers

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that require emergency action under Section 305(c) of the Magnuson-Stevens Fishery Conservation and Management Act, provided the public has been notified of the Council's intent to take final action to address the emergency. (Authority: 16 U.S.C. 1801 et seq.)

Dated: January 8, 2026.
Ray Izard Marguez,
Acting Deputy Director, Office of Sustainable Fisheries, National Marine Fisheries Service.
 (FR Doc. 2026-0030 F161 1-8-26; 8-45 and
BLING CODE: 919D-2P

CONSUMER FINANCIAL PROTECTION BUREAU

Withdrawal of Joint Statement on the Equal Credit Opportunity Act and Noncitizen Borrowers

Agency: Consumer Financial Protection Bureau.
ACTION: Notice of withdrawal.

SUMMARY: The Consumer Financial Protection Bureau (Bureau) and Department of Justice (DOJ) are withdrawing a joint statement issued in October 2023 regarding the implications of a creditor's consideration of an individual's immigration status under the Equal Credit Opportunity Act (ECOA).

DATES: The statement published on October 18, 2023, at 88 FR 71843, is withdrawn as of January 12, 2026.

FOR FURTHER INFORMATION CONTACT: Dave Gettler, Program Specialist, Office of Regulations, at 202-435-7700 or <https://reginfo.gov>. If you require this document in an alternative electronic format, please contact CFPB at accessibility@cfpb.gov.

SUPPLEMENTARY INFORMATION: The Consumer Financial Protection Bureau (Bureau) and Department of Justice (DOJ), (collectively, the agencies) are charged with enforcing the anti-discrimination provisions of the Equal Credit Opportunity Act (ECOA).¹ ECOA prohibits discrimination by a

¹ The Bureau enforces ECOA with respect to any person subject to ECOA's coverage, with the limited exceptions under the Consumer Financial Protection Act, 15 U.S.C. 1601(a)(1), which excludes from ECOA enforcement ECOA where there is evidence of a "pattern or practice" of discrimination, 15 U.S.C. 1601(a)(4).

creditor in any aspect of a credit transaction, on the basis of race, color, religion, national origin, sex, marital status, age, an applicant's receipt of public assistance, or the good faith exercise of an applicant's rights under the Consumer Credit Protection Act, 15 U.S.C. 1601. On October 12, 2023, the agencies published a joint statement (the joint statement) cautioning that creditor policies related to an applicant's immigration or citizenship status could, in certain circumstances, run afoul of ECOA's and Regulation B's prohibition of discrimination on the basis of protected classes, including race and national origin.² The agencies now hereby withdraw the joint statement for the following reasons.³

The joint statement did not purport to interpret ECOA or Regulation B, which generally permit creditors to consider immigration or citizenship status. The joint statement further acknowledged that Regulation B expressly permits consideration of immigration or citizenship status for certain purposes. However, by focusing primarily on risks that could arise if such consideration were used to discriminate on a protected basis, the joint statement was able to create the impression that either ECOA or Regulation B itself imposes limitations on the consideration of immigration or citizenship status when evaluating an application for credit. No such limitation exists, and this withdrawal is intended to correct any such misimpression.

Separately, as announced in the Bureau's guidance withdrawal notification published in the *Federal Register* on May 12, 2025, which withdrew guidance documents issued by the Bureau since 2011, the Bureau has revised its policies regarding the issuance of guidance documents.⁴ Under the revised policy, the Bureau now issues guidance that is not necessary or would increase compliance burdens. The Bureau concludes that a

² A notice of the statement was also published in the *Federal Register*, 88 FR 71843 (Oct. 18, 2023).
³ This action is issued under the Bureau's authority to provide guidance regarding ECOA and Regulation B, as amended under the Dodd-Frank Wall Street Reform and Consumer Protection Act, 15 U.S.C. 1601(a)(1), or effect of law, and it has no legally binding effect, and it is not intended to create any enforceable legal rights or obligations (other than those required by law). (15 U.S.C. 1602.2(a)(6) [providing customer identification requirements].)
⁴ 90 FR 2084 (May 12, 2025).

additional guidance on this topic beyond what Regulation B provides is unnecessary and, to the extent that the joint statement was understood to require new or increased compliance efforts, it is appropriate for rescission under the Bureau's revised policy.

I. ECOA and Regulation B

Nothing in ECOA or Regulation B prohibits the consideration of an applicant's immigration or citizenship status. To the contrary, Regulation B permits the consideration of "any information obtained, so long as the information is not used to discriminate against an applicant on a prohibited basis." 12 CFR 1002.6(a). More specifically, it states that "[a] creditor may take the applicant's immigration status into account," 12 CFR part 1002, supp. 1, § 2(a)-2, and "may consider the applicant's immigration status or status as a permanent resident of the United States, and any additional information that may be necessary to ascertain the creditor's rights and remedies regarding repayment." 12 CFR 1002.6(b)(7). The joint statement's exclusive emphasis on the risks of such consideration, however, may have created the misimpression that ECOA or Regulation B prohibit or otherwise limit the consideration of immigration or citizenship status by a creditor evaluating an application for credit.

Not only would such a limitation be inconsistent with Regulation B, but the illustrative scenario described in the joint statement as well as the conclusion as to how creditors may consider immigration status while managing credit and compliance risks. It is unimpeachable that the joint statement published a practice in which considering how long a credit applicant had a Social Security Number could be used as a proxy for the applicant's national origin or race, which would then be prohibited discriminations. This example may have been perceived as discouraging the collection and assessment of such identifying information when in fact it can be important to a creditor's compliance with anti-money laundering or Know Your Customer requirements.⁵

⁵ See, e.g., 31 U.S.C. 5318(f) [listing the Secretary of the Treasury to promulgate regulations defining such present identification requirements]; 31 CFR 1002.2(a)(6) [providing customer identification requirements].

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Similarly, the joint statement suggests that applying a blanket underwriting policy for certain groups of non-citizens may constitute discrimination in violation of ECOA if not strictly necessary for assessing the creditor's ability to obtain repayment or meet other obligations. This example could be read as posing a bright-line, one-size-fits-all approach to underwriting noncitizens as necessary to ECOA compliance. There is no such requirement in ECOA or Regulation B, and focusing exclusively on compliance risks ignores that creditors may legitimately use additional information in particular circumstances to fully assess underwriting risks related to providing credit to those without lawful status or who are otherwise unauthorized to work in the United States. A creditor's immigration or citizenship status may present underwriting risks that typical assessments of financial capacity alone will not fully resolve. As Regulation B acknowledges, this is something creditors may legitimately consider. To the extent the joint statement suggested, or could be read to suggest, that the practices it describes are presumptively discriminatory in violation of ECOA, such a presumption would not be supported by ECOA or Regulation B.

The joint statement further assessed the interaction between 42 U.S.C. 1981 (section 1981) and ECOA. While the joint statement described how courts have approached the interaction between these two laws, as a credit discrimination claim under section 1981 based on citizenship or status alone, the agencies did not purport to interpret the scope of liability under section 1981, nor do they purport to do so now. The agencies' withdrawal of the joint statement serves to address any misimpression that the joint statement has interpreted the law to confer any liability under the statute that has not already been recognized by courts.

II. Other Consideration

While the Bureau has authority to issue guidance regarding the statutes and regulations it administers, the Bureau has determined that the joint statement is not consistent with the revised policy on the issuance of guidance. As described in its May 2025 guidance withdrawal notification, the Bureau's revised policy is to issue guidance only when necessary and where doing so would reduce compliance burdens. Given that it is the responsibility of Congress and the President in the legislative process to define or expand the contours of Civil rights protections, the agencies have

determined that the joint statement is not necessary. Additionally, the joint statement does not mitigate any unnecessary compliance burdens. Therefore, having completed its review, the agencies have determined that the ability to obtain repayment or meet other obligations. This example could be read as posing a bright-line, one-size-fits-all approach to underwriting noncitizens as necessary to ECOA compliance. There is no such requirement in ECOA or Regulation B, and focusing exclusively on compliance risks ignores that creditors may legitimately use additional information in particular circumstances to fully assess underwriting risks related to providing credit to those without lawful status or who are otherwise unauthorized to work in the United States. A creditor's immigration or citizenship status may present underwriting risks that typical assessments of financial capacity alone will not fully resolve. As Regulation B acknowledges, this is something creditors may legitimately consider. To the extent the joint statement suggested, or could be read to suggest, that the practices it describes are presumptively discriminatory in violation of ECOA, such a presumption would not be supported by ECOA or Regulation B.

For these reasons, the agencies are exercising their discretion to withdraw the October 12, 2023, notice titled, *Joint Statement on Fair Lending and Credit Opportunities for Noncitizens Borrowers Under the Equal Credit Opportunity Act*.

III. Regulatory Matters

The Office of Information and Regulatory Affairs within the Office of Management and Budget (OMB) has determined that this action is a "significant regulatory action" under E.O. 12866, on credit discrimination claims under section 1981 based on citizenship or status alone, the agencies did not purport to interpret the scope of liability under section 1981, nor do they purport to do so now. The agencies' withdrawal of the joint statement serves to address any misimpression that the joint statement has interpreted the law to confer any liability under the statute that has not already been recognized by courts.

Equal Access:
Acting Director, Consumer Financial Protection Bureau.
 (FR Doc. 2026-0030 F161 1-12-26; 8-45 and
BLING CODE: 4010-40-AP

¹ Although ECOA section 1601(a)(1) provides that any provision of ECOA prohibiting liability shall not be done or omitted in any form with its enforcement with any person, such restriction shall not be applied to any such rule or interpretation and therefore the word omitted may include conduct that is not subject to regulation outside to some extent. (15 U.S.C. 1601(a)(1)).

DEPARTMENT OF DEFENSE

Department of the Air Force

Notice of Federal Advisory Committee Meeting: Correction

AGENCY: Board of Visitors of the U.S. Air Force Academy (BoV AFA), Department of the Air Force.
ACTION: Notice of Federal Advisory Committee meeting: correction.

SUMMARY: The Department of Defense (DoD) published a notice in the *Federal Register* of January 8, 2026, announcing that the following Federal Advisory Committee meeting of the Board of Visitors of the U.S. Air Force Academy (BoV AFA) will take place. The document contained incorrect times.

SUPPLEMENTARY INFORMATION:

Correction: In the *Federal Register* of January 7, 2026, in FR Doc. 2026-00135, Docket Number 2026-00135, page 703, in the third column, fourth paragraph, correct the DATES caption to read:

DATES: The meeting is open to the public: Thursday, February 5, 2026, from approximately 1:00 p.m. to 4:30 p.m. (Eastern Time). Those wishing to attend in person are requested to submit their names, affiliation, and phone number to CSAFAICQ@wpafb.af.mil by January 20, 2026. The meeting will be streaming accessible. Seating is available on a first come, first served basis.

Dated January 8, 2026.
Crylle C. Pope,
Acting Federal Register Liaison Officer.
 (FR Doc. 2026-0030 F161 1-8-26; 8-45 and
BLING CODE: 9114-4-P

DEPARTMENT OF DEFENSE

Office of the Secretary

(Transmittal No. 25-38)

Arms Sales Notification

AGENCY: Defense Security Cooperation Agency, Department of Defense (DOD).
ACTION: Arms sales notice.

SUMMARY: The DOD is publishing the unclassified text of an arms sales notification.

FOR FURTHER INFORMATION CONTACT:
 (DOD) Zakia A. (703) 605-4233;
csoc@acrs.org; csoc@acrs.org
MAILING: csoc@acrs.org

SUPPLEMENTARY INFORMATION: This (703) 605-4233 notification is published to fulfill the requirements of section 155 of