

# Congress of the United States

Washington, DC 20515

April 23, 2026

The Honorable Russell Vought  
Acting Director  
Consumer Financial Protection Bureau  
1700 G St. NW  
Washington, DC 20552

Dear Acting Director Vought,

We write in response to the Consumer Financial Protection Bureau's (CFPB) termination of the consent order holding Citigroup Inc. (Citi) accountable for its alleged discrimination against Armenian Americans through its handling of credit card applications. We are deeply troubled by this termination and request more information on the basis for it as well as the steps Citi has taken to fulfill its obligations under the consent order.

In the CFPB's order, the Bureau found it was Citi's practice to "apply extra scrutiny to, negatively assess, and often deny certain credit card applications based on Armenian national origin."<sup>1</sup> As detailed in the CFPB's findings, Citi employees allegedly targeted applicants in the state of California whose last names ended in "-ian" and "-yan," which are common parts of Armenian surnames, particularly applicants whose addresses were in or near Glendale, California, home to a large and vibrant Armenian community. Citi employees also referred to applicants as "Armenian bad guys" and the "Southern California Armenian Mafia" and negatively singling out their creditworthiness, behavior which was actively encouraged by supervisors and trainers.<sup>2</sup>

On November 8, 2023, the CFPB issued a consent order finding that Citi discriminated against consumers based on their national origin and therefore violated the Equal Credit Opportunity Act (ECOA), Regulation B, and the Dodd-Frank Wall Street Reform and Consumer Protection Act. As a result, CFPB issued a judgement against Citi, requiring the bank to pay \$1.4 million to the affected consumers and a \$24.5 million civil penalty. Further, CFPB required Citi to implement a compliance management system. This compliance plan required Citi to monitor training materials as well as the written and oral communications of their employees responsible for approving and denying credit card applications. The plan also included reporting requirements on potential discrimination that violated ECOA. This consent order was intended to stay in place until 2028 to allow the CFPB to continue monitoring Citibank's compliance with the order through means like document requests and employee interviews.<sup>3</sup> This rigorous oversight was particularly necessary given that Citi previously faced other enforcement actions from the CFPB for other alleged misconduct.<sup>4</sup>

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<sup>1</sup> [https://files.consumerfinance.gov/f/documents/cfpb\\_citibank-na\\_2023-cfpb-0013\\_consent-order\\_2023-11.pdf](https://files.consumerfinance.gov/f/documents/cfpb_citibank-na_2023-cfpb-0013_consent-order_2023-11.pdf), p.

2.

<sup>2</sup> [https://files.consumerfinance.gov/f/documents/cfpb\\_citibank-na\\_2023-cfpb-0013\\_consent-order\\_2023-11.pdf](https://files.consumerfinance.gov/f/documents/cfpb_citibank-na_2023-cfpb-0013_consent-order_2023-11.pdf), p.3.

<sup>3</sup> [https://files.consumerfinance.gov/f/documents/cfpb\\_citibank-na\\_2023-cfpb-0013\\_consent-order\\_2023-11.pdf](https://files.consumerfinance.gov/f/documents/cfpb_citibank-na_2023-cfpb-0013_consent-order_2023-11.pdf), p.30-34.

<sup>4</sup> [https://violationtracker.goodjobsfirst.org/?company\\_op=starts&company=citibank&order=agency\\_code&sort=](https://violationtracker.goodjobsfirst.org/?company_op=starts&company=citibank&order=agency_code&sort=)

On October 16, 2025, the CFPB terminated the consent order, claiming that Citi “has fulfilled certain obligations” laid out in the consent order.<sup>5</sup> The Bureau claimed these obligations included paying a \$24.5 million civil money penalty, making redress payments, and “taking steps to implement injunctive relief to prevent future violations” of the consent order.<sup>6</sup> This termination effectively invalidates the consent order, even though CFPB originally intended for it to remain in effect until 2028.<sup>7</sup>

The CFPB has a statutory obligation to protect consumers and ensure equal access to credit. The decision to terminate the consent order is a clear abdication of this responsibility, and casts significant doubt on the CFPB’s commitment to protecting the Armenian American community and enforcing the Equal Credit Opportunity Act on behalf of all Americans.

Accordingly, we ask that you provide written answers to the following questions no later than May 7, 2026:

1. The CFPB terminated this consent order three years early. Please provide a justification for this early termination.
2. The consent order termination states that Citi has fulfilled “certain obligations.”
  - a. Please specify all obligations has Citi fulfilled under the consent order.
  - b. Please specify all obligations that Citi has not fulfilled under the consent order.
3. In the 2023 consent order, the CFPB found that Citi’s “pattern or practice of discrimination is not explained by a legitimate, non-discriminatory reason.” Does the current leadership of the CFPB agree with this assessment?
4. How many of the victims have received redress payments?
5. What was the total amount Citi paid directly to victims?
6. Are there any victims who have not received any redress payments? If yes, how many?
7. The CFPB’s consent order required Citi to both stop any unlawful behavior and implement new measures to ensure future compliance. What procedures and policies has Citi implemented to meet this obligation? Please specify systemic changes in the following areas made to eliminate unlawful discrimination:
  - a. Workforce training and development, including employee disciplinary action
  - b. Manual underwriting
  - c. Risk detection, compliance, and fraud prevention
  - d. Algorithmic screening for names associated with various ethnicities
  - e. Any additional relevant changes
8. Did you receive direction, instruction, suggestions, or other communication from White House officials to terminate the consent order against Citi? If so, please share all such communications.
9. What actions have been taken to hold Citi supervisors and employees responsible for these allegedly discriminatory practices?

Thank you in advance for your attention to this matter. We look forward to reviewing your responses.

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<sup>5</sup> [https://files.consumerfinance.gov/f/documents/cfpb\\_citibank-n-a\\_termination-consent-order\\_2025-10.pdf](https://files.consumerfinance.gov/f/documents/cfpb_citibank-n-a_termination-consent-order_2025-10.pdf)

<sup>6</sup> [https://files.consumerfinance.gov/f/documents/cfpb\\_citibank-n-a\\_termination-consent-order\\_2025-10.pdf](https://files.consumerfinance.gov/f/documents/cfpb_citibank-n-a_termination-consent-order_2025-10.pdf)

<sup>7</sup> [https://files.consumerfinance.gov/f/documents/cfpb\\_citibank-na\\_2023-cfpb-0013\\_consent-order\\_2023-11.pdf](https://files.consumerfinance.gov/f/documents/cfpb_citibank-na_2023-cfpb-0013_consent-order_2023-11.pdf), p.34.

Sincerely,



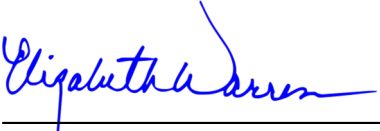
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Adam B. Schiff  
United States Senator



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Brad Sherman  
Member of Congress



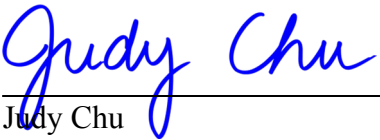
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Elizabeth Warren  
Ranking Member  
Committee on Banking,  
Housing, and Urban Affairs



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Laura Friedman  
Member of Congress



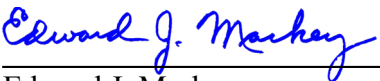
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Judy Chu  
Member of Congress



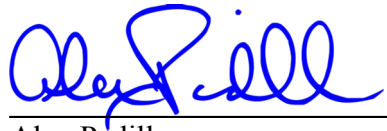
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Luz M. Rivas  
Member of Congress



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Edward J. Markey  
United States Senator



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Alex Padilla  
United States Senator