



Fraud Prevention in Online Lending

Fair Credit Reporting Act: Overview

- The Act (Title VI of the Consumer Credit Protection Act) protects information collected by consumer reporting agencies such as credit bureaus, medical information companies and tenant screening services.
- Information in a consumer report cannot be provided to anyone who does not have a purpose specified in the Act.
- Companies that provide information to consumer reporting agencies also have specific legal obligations, including the duty to investigate disputed information.
- In addition, users of the information for credit, insurance, or employment purposes must notify the consumer when an adverse action is taken on the basis of such reports.
- The Fair and Accurate Credit Transactions Act added many provisions to this Act primarily relating to record accuracy and identity theft.
- The Dodd-Frank Act transferred to the Consumer Financial Protection Bureau most of the rulemaking responsibilities added to this Act by the Fair and Accurate Credit Transactions Act and the Credit CARD Act, but the Federal Trade Commission (“FTC”) retains all its enforcement authority.

Fair Credit Reporting Act:

Obligations and Examination Considerations

- Debt Collector Communications Concerning Identity Theft – Sections 615(g); 15 U.S.C. 1681m(g)
 1. Determine whether the entity collects debts for third parties.
 2. Determine whether the entity has policies and procedures to ensure that the third parties are notified if the entity obtains any information that may indicate that the debt in question is the result of fraud or identity theft.
 3. Determine if the entity has effective policies and procedures for providing information to consumers to whom the fraudulent debts relate.
 4. If procedural weaknesses or other risks requiring further investigation are noted, review a sample of instances where consumers have alleged identity theft and requested information related to transactions to determine if all of the appropriate information was provided to the consumer.

Fair Credit Reporting Act:

Obligations and Examination Considerations

- Prevention of Re-Pollution of Consumer Reports – Section 623(a)(6); 15 U.S.C. 1681s-2(a)(6)
- 1. If the entity provides information to a consumer reporting agency, review the entity's policies and procedures for ensuring that items of information blocked because of an alleged identity theft are not re-reported to the consumer reporting agency.
- 2. If weaknesses are noted within the entity's policies and procedures, review a sample of notices from a consumer reporting agency of allegedly fraudulent information due to identity theft furnished by the entity, to determine whether the entity does not re-report the item to a consumer reporting agency.
- 3. If procedural weaknesses or other risks requiring further investigation are noted, verify that the entity has not sold or transferred a debt that resulted from an alleged identity theft.

Fair Credit Reporting Act:

Obligations Examination Considerations

- Consumer Alerts and Identity Theft Protections
 - Fraud and Active Duty Alerts – Section 605A(h); 15 U.S.C. 1681c-1(h)
 1. Determine whether the entity has effective policies and procedures in place to verify the identity of consumers in situations in which consumer reports include fraud and/or active duty military alerts.
 2. Determine if the entity has effective policies and procedures in place to contact consumers in situations where consumer reports include extended alerts.
 3. If procedural weaknesses or other risks requiring further investigation are noted, review a sample of transactions in which consumer reports including these types of alerts were obtained. Verify that the entity complied with the identity verification and/or consumer contact requirements.

Fair Credit Reporting Act:

Obligations and Examination Considerations

- Consumer Alerts and Identity Theft Protections
 - Information Available to Victims – Section 609(e); 15 U.S.C. 1681g(e)
 1. Review the entity's policies, procedures, and/or practices to determine whether identities and claims of fraudulent transactions are verified and whether information is properly disclosed to victims of identity theft and/or appropriately authorized law enforcement agents.
 2. If procedural weaknesses or other risks requiring further investigation are noted, review a sample of these types of requests to endetermine whether the entity properly verified the requestor's identity prior to disclosing the information.

Telemarketing and Consumer Fraud and Abuse Prevention Act : Overview

- The Act, as amended, requires the Commission to promulgate regulations (a) defining and prohibiting deceptive telemarketing acts or practices; (b) prohibiting telemarketers from engaging in a pattern of unsolicited telephone calls that a reasonable consumer would consider coercive or an invasion of privacy; (c) restricting the hours of the day and night when unsolicited telephone calls may be made to consumers; and (d) requiring disclosure of the nature of the call at the start of an unsolicited call made to sell goods or services. Laws specifically related to Do-Not-Call and to charitable solicitations are listed separately.

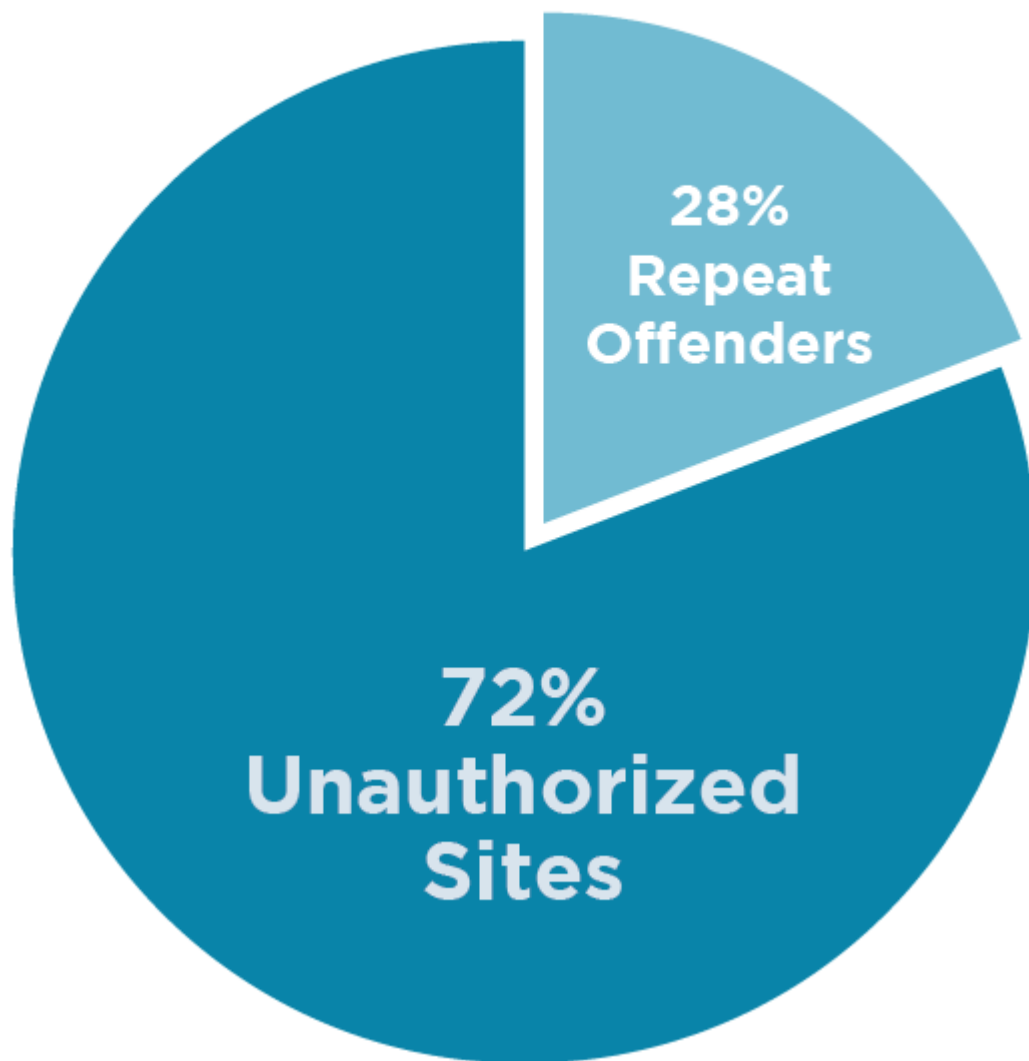
Telemarketing and Consumer Fraud and Abuse Prevention Act : Financial Services Exemptions

- Financial Services Exemptions:
 - In a 2015 decision geared toward the financial services industry, the FCC issued an Omnibus Order which established a free-to-end-user safe harbor for financial institutions' use of text messages and voice calls to consumers for non-telemarketing, non-advertising messages.
- The Order specified that financial institutions need not obtain prior consent to robocall or text message the customer if such calls or texts:
 1. Are free to the user; meaning the call or text does not count against any wireless plan limits, such as minutes or text caps;
 2. Are limited to content concerning (a) alerts about fraud or identity theft; (b) alerts of possible security breaches of a customer's personal information; (c) messages about steps customers can take to prevent or remedy harm caused by a data security breach; and (d) actions needed to arrange for receipt of pending money transfers;
 3. Are sent only to the wireless number provided by the customer of the financial institution;
 4. State the name and contact information of the financial institution;
 5. Do not include any telemarketing, cross-marketing, solicitation, debt collection, or advertising content;
 6. Are limited to one minute or less for voice, 160 characters or less for text messages;
 7. Number no more than three messages over a three-day period per event;
 8. Offer recipients an easy "opt out" option to avoid such communications in the future, which in the case of text messages must be the ability to respond "STOP;" and
 9. In the event a consumer opts out, the financial institution honors that request immediately.

Where to look for common deceptive practices

- Consumer Misdirects
- Web Traffic
- Spoofing
- Cybersquatting
- Copycat Sites
- Coupon Sites

**A 2018-2021 study
across 43 lenders.**



**Over 70% of Sites
= Scammers**

95% of the **URLs** found were phony sites using a lending company name pretending to be a lender. **28%** of the violations identified were from repeat offenders. **Almost 15,000 URLs** and **43 lending brands** were part of the study.

Consumer Misdirects

Using blog sites to pose as another brand to bring traffic to a separate page

← → ↻ https://plaingreen-promocode.blogspot.com


Plain Green Promo code

Classic ▾ | หน้าแรก

OCT 2

PlainGreen Enter Promo code - Personal Loans

[PlainGreen Enter Promo code](#)



Get Started!
Do You Need Cash Today ?

I NEED: \$

*Full Name

*Street Address

Getting the cash you need is
QUICK & EASY

CLICK HERE NOW
Get Cash Quickly & Easily

PlainGreen Enter Promo code For everyone, the story is the same - finances fluctuate. The trick is learning how to properly manage finances to make sure there is sufficient at all times. But lets face it. Sometimes we have no choice but to pray a lender approves our applications for a \$5,000 personal loan with bad credit. [PlainGreen Enter Promo code](#).

Managing money is a learning experience, and the mistakes made in our past can come back to haunt us. This is especially the case when we are in need of a cash injection but are left to hope for loan approval, with low credit scores holding us back. [PlainGreen Enter Promo code](#).

When this happens, the key to getting the green light is to find the right loan from the right lender. But how can this be done? Knowing what options are out there can help in getting the personal loan, especially in identifying the alternative loan options. [PlainGreen Enter Promo code](#).

Posted 2nd October 2020 by [paydaygot](#)

[Tweet](#)

Consumer Misdirects


Resulting page

← → ↻ ⚠ Not secure | http://www.moregetloan.com

Welcome to MoreGetLoan.com

Payday Loans Borrow Today for a Better Tomorrow

3%



How much do you need?
Get your loan online

☐ \$200 – \$500

☒ \$500 – \$1000 ✓

☐ \$1000 – \$2,500

☐ \$2,500 – \$5,000

Next Step →

EXCELLENT SERVICE 256-BIT ENCRYPTION 100% POSITIVE FEEDBACK

Web Traffic

Sites pretending to “review” many of the bigger lending brands in the industry to drive traffic to the site and regardless of which brand you are reading about the form takes you to their specific form not the brand you are reading the review about

Web Traffic

← → ↻ 🔒 https://usaloansnearme.com/mt/big-sandy/plain-green-loans-59520/

Home » Montana » Big Sandy, MT » Plain Green Loans in Big Sandy, MT 59520 at 600 Mack Rd

Plain Green Loans in Big Sandy, MT 59520 at 600 Mack Rd

This page contains information about Plain Green Loans in Big Sandy, MT 59520

Fast online loans (\$100 - \$5,000) from direct lenders:

Loan amount Email Zip [START NOW](#)

Phone: –

Address: 600 Mack Rd, Big Sandy, MT 59520

Plain Green Loans on the map:

48°10'45.4"N 110°07'00.3"W
378 Riney St, Big Sandy, MT 59520
[View larger map](#)

Plain Green Loans offer the following services for individuals and/or legal entities:

- Payday Loans / Cash Advance
- Check Cashing

The company is located at 600 Mack Rd, Big Sandy, MT. To contact Plain Green Loans, call – during working hours

Plain Green Loans Customer Reviews:

Read reviews on Yelp – [click here](#)

Fast online loans (\$100 - \$5,000) from direct lenders:

Loan amount Email Zip [START NOW](#)

Similar services in your area:

Plain Green Loans in Big Sandy, MT 59520 at 600 Mack Rd

Big Sky Financial in Helena, MT 59601 at 2818 Billings Ave

Check Into Cash in Bozeman, MT 59715 at 1619 W Main St

My Montana Payday in Billings, MT 59101 at 316 N 26th St

Big Sky Financial in Billings, MT 59101 at 4047 Montana Ave Ste 1

Urgent Title Pawn Loans in Kalispell, MT 59901 at 1297 N Meridian Rd


Advance America Cash Advance in Cody, WY 82414 at 318 Yellowstone Ave


Ace Payday Loans in Cody, WY 82414 at 540 Yellowstone Ave
Unit C

Money Lenders in Sheridan, WY 82801 at 555 N Main St

Spoofting

Mostly used to collect consumer data - Sites posing as legitimate business sites

ABOUT USWHY CHOOSE USHOW IT WORKSFAQS




How much do you need?

\$100 - \$500

\$500 - \$1000

\$1000 - \$2500

\$2500 - \$5000

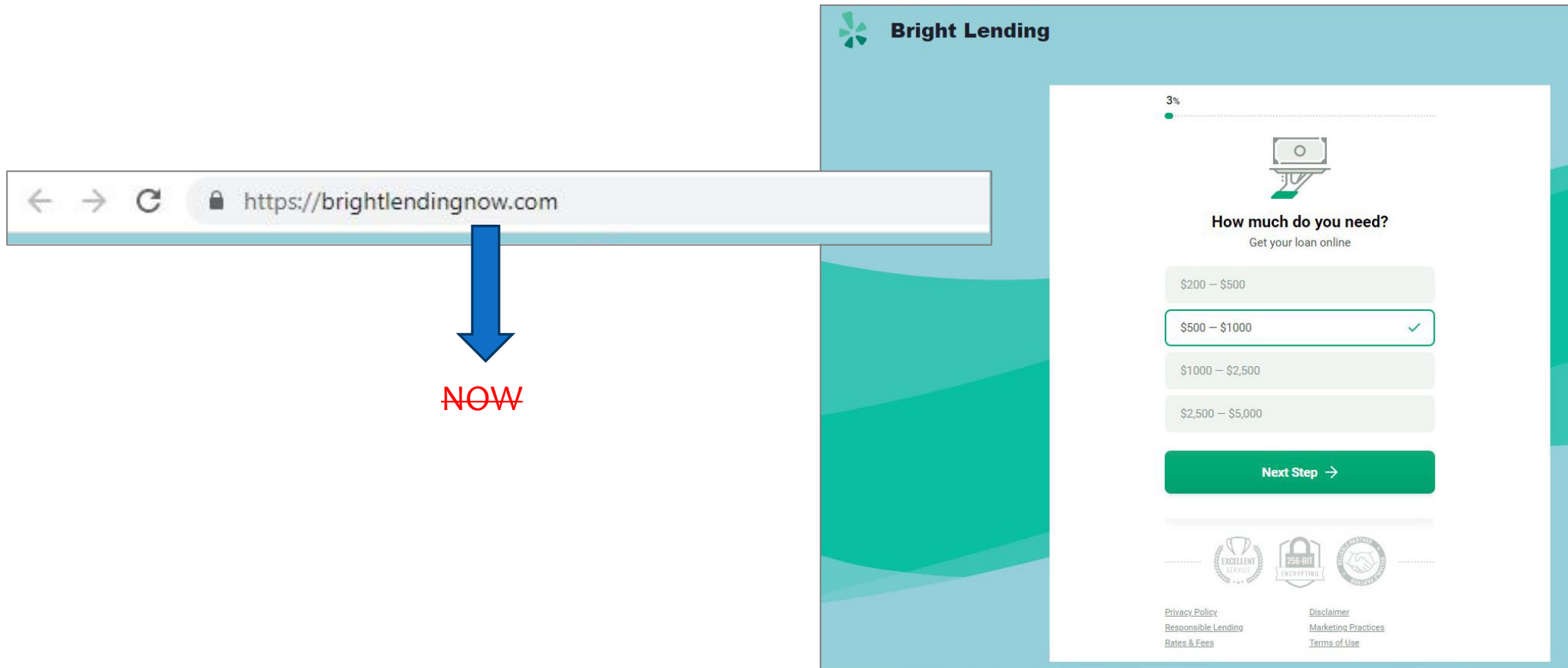
 APR can range between 5.99% and 35.99% for loans between \$100 and \$5,000.

Back

We use 256 bit SSL technology to encrypt your data.

Cybersquatting

Slightly altering a domain name to make it look like the legitimate business website




Copycat Sites

Hosted overseas by avoiding local trademark laws even advertising as the brands official name (Netherlands)

← → ↻ ⚠ Not secure | https://www.greenline loansz.com

Greenline Loans

HOME APPLY NOW RATES HOW IT WORKS



Greenline Loans up to \$2,500

Get Your Cash Now

How Greenline Loans works

APPLY FOR CASH
Fill out our short application form secured with 256-bit technology

GET APPROVED
If approved, review all terms & rates provided by the loan lender at

CHECK YOUR ACCOUNT
Get cash deposited into your bank account as soon as the next

← → ↻ ⚠ Not secure | https://www.greenline loansz.com/apply.html

Greenline Loans

HOME APPLY NOW RATES HOW IT WORKS

Submit Your Loan Application Quickly And Easily

1. Customer Information ⓘ

*Loan Amount
Select a loan amount

*First Name

*Last Name

*Street Address

Apt. Number or Suite

*Zip Code

*Home Owner
Select an option

*Time At Address
Select an answer

*Active Military
Select an answer

2. Contact Information ⓘ

*Email Address


*Home Phone

3. Employment Information ⓘ

Coupon Sites

← → ↻ 🔒 https://www.aehotdeals.net/great-plains-lending-promo-code

aehotdeals.netAll Stores



Home > Stores > Great Plains Lending Promo Code

Great Plains Lending Promo Code June 2022

Continue to Great Plains Lending

Choose from 15 Great Plains Lending Coupon Code and Coupon United Arab Emirates, as well as Great Plains Lending Promo Code we have listed below. You're sure to find one Discount Code that can save you greatplainslending.com purchase during July 2022.

ALL

PROMO CODE

DEAL

FREE SHIPPING

Sales

DealGreat Plains Lending

Great Plains Lending Promo Code

Expires 26-9-22

Get Deal

Sales

CodeGreat Plains Lending

Free Online Learning Center Features Videos And Tools For You

Expires 23-9-22

Get Code

\$1500 Off

DealGreat Plains Lending

Loan \$1500 40 Payments At Just \$136.46 Per Payment

Expires 24-8-22

Get Deal

DealGreat Plains Lending

★★★★☆Rate

4.3 / 192 Votes

Great Plains Lending Stats

Total

15

Promo Codes

1

Deals

14

Max Discount

60%

Last Updated

June 2022


Great Plains Lending Top Coupon Codes and Offers

• Great Plains Lending Promo Code

• Free Online Learning Center Features Videos And Tools For You

• Loan \$1500 40 Payments At Just \$136.46 Per Payment

• Loan Amount Of \$1100: Bi-Weekly Payment As Much As \$130.19 32



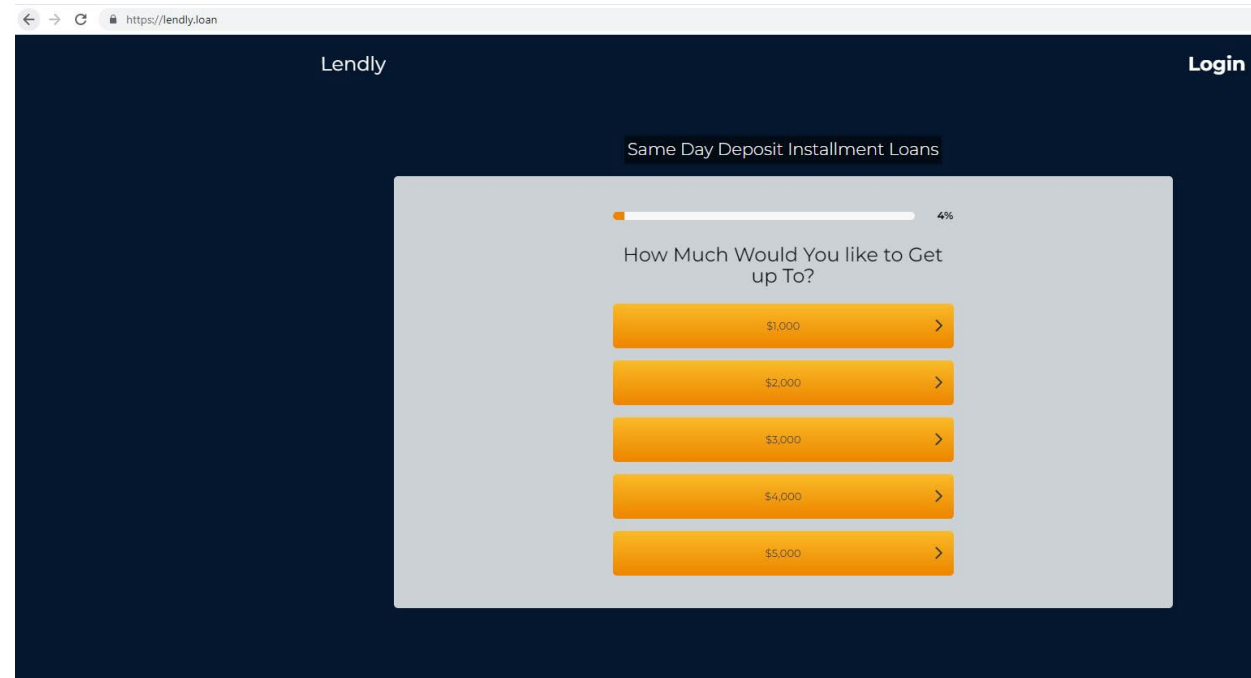
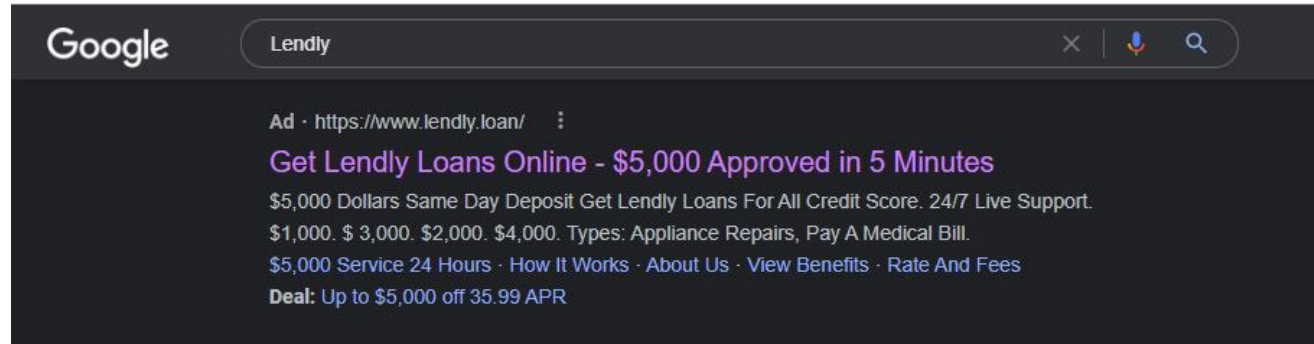
OLA
Online Lenders Alliance

How to effectively identify fraud for your brand

- Paid Search
- Social Media

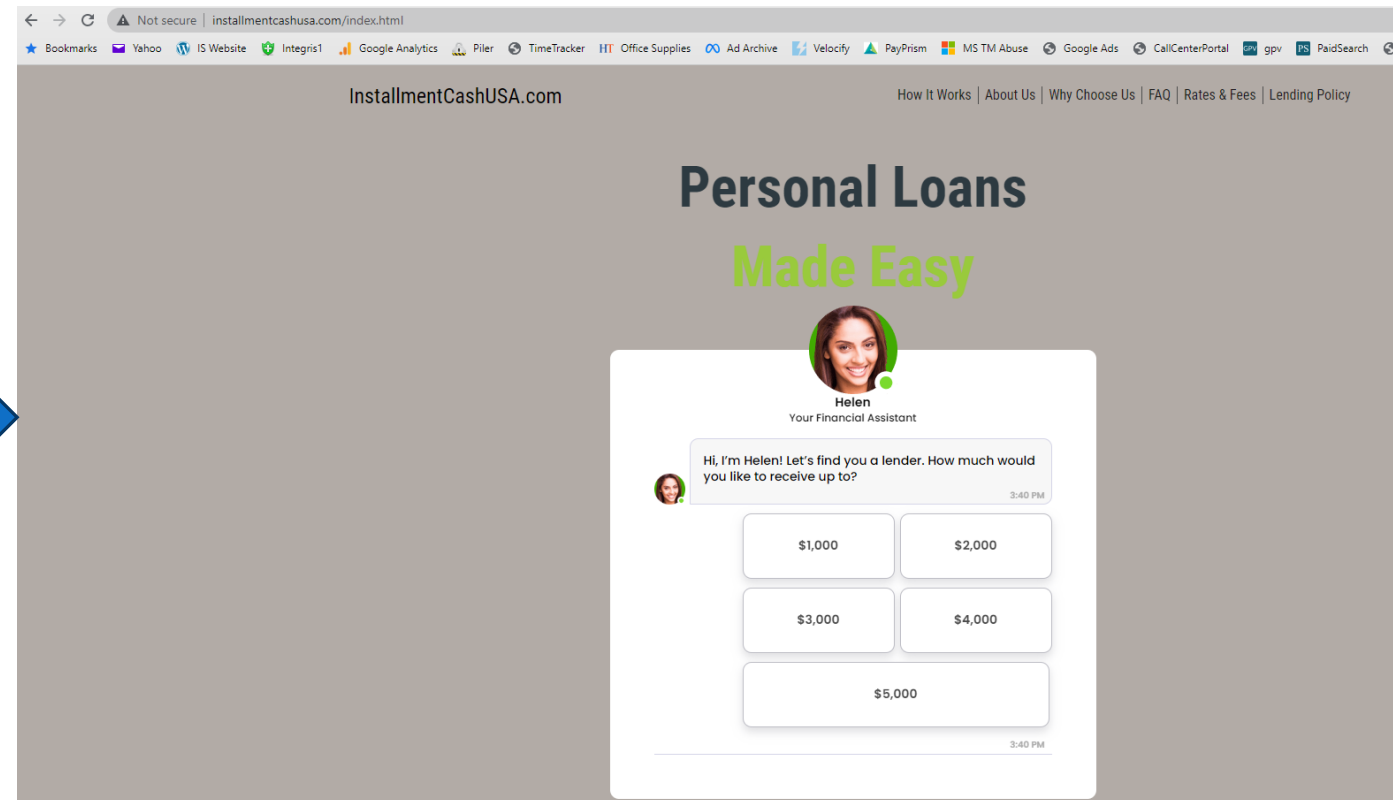
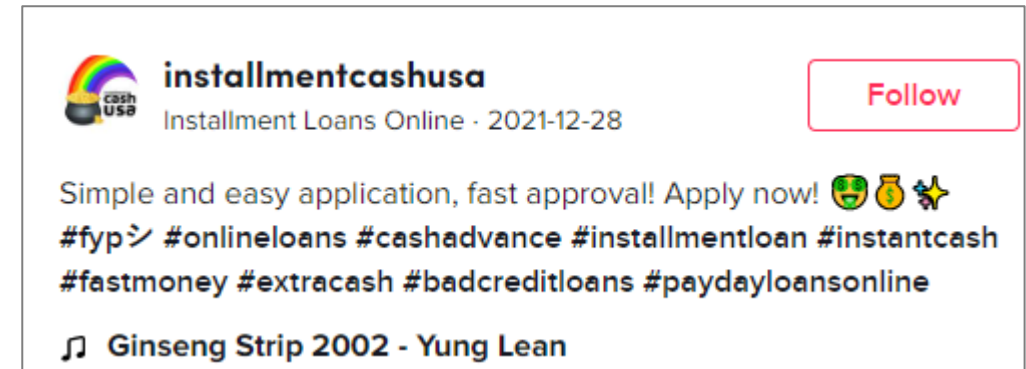
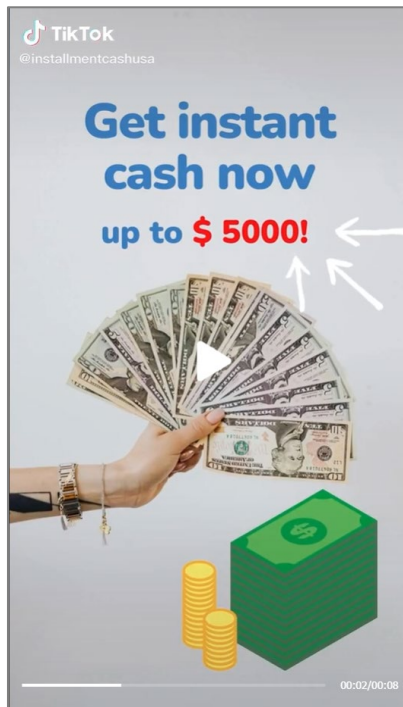
Paid Search

Affiliate sites using other brands names in their Paid Search Ads to drive traffic to their site

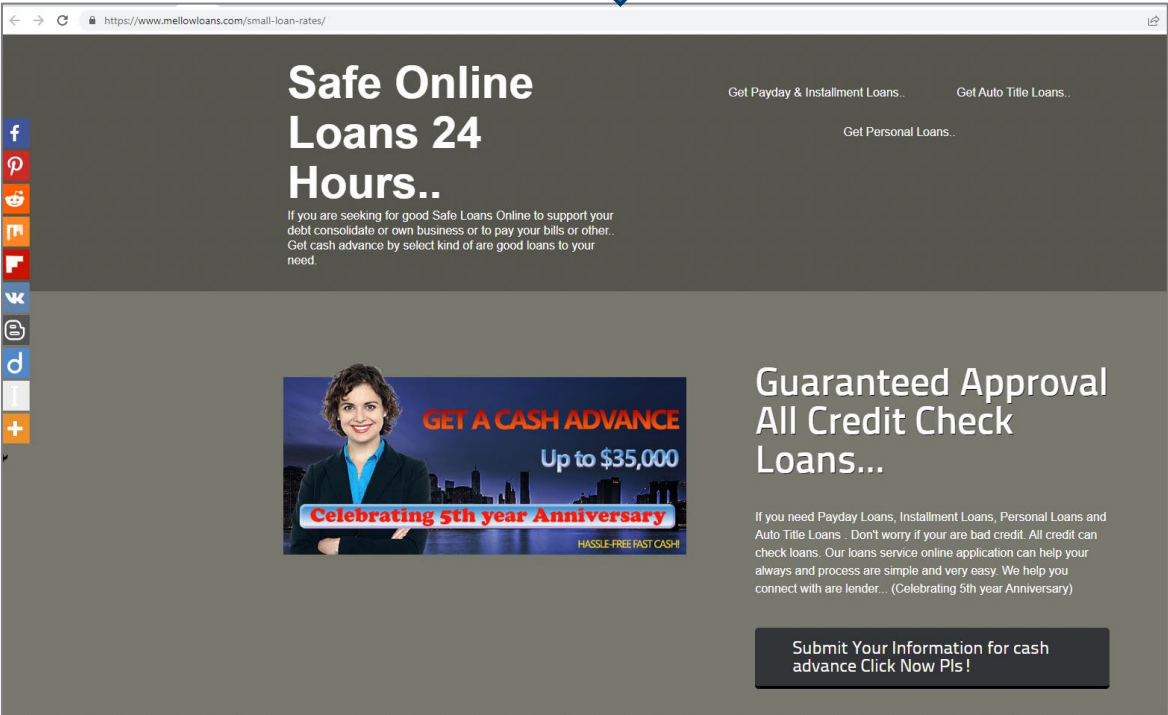
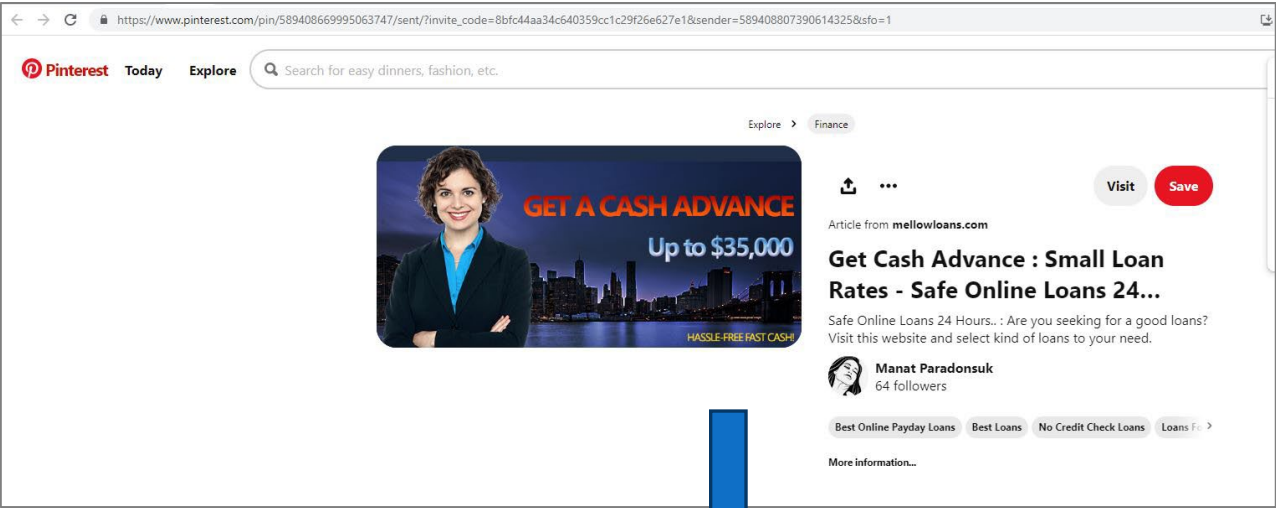
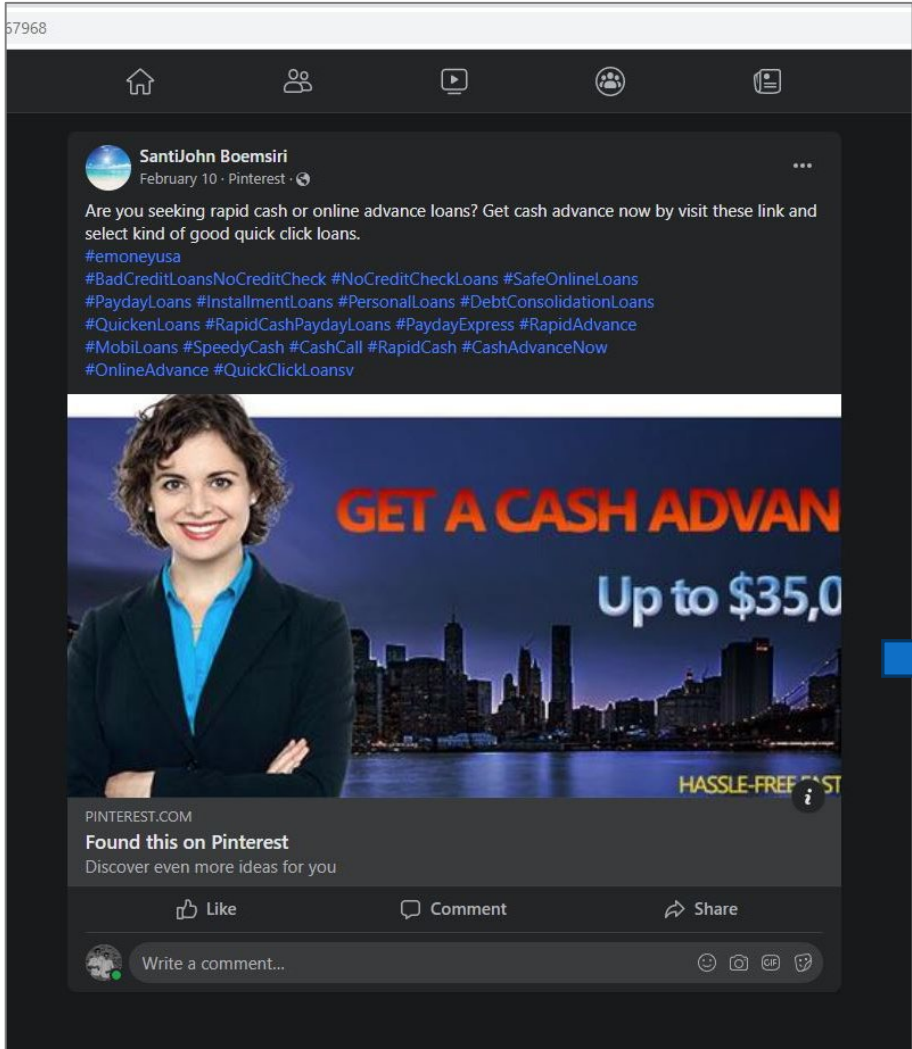


Social Media

Social Media sponsored ads, content in video/reels can all be used to infringe on brands or use deceptive messaging



Social Media



Successful Remediation Tactics

- Site Owner
- DMCA Takedown
- Documentation and Processes

Successful Remediation Tactics

- Site Owner
 - ICANN – the rulers of the registrars
 - Cloudflare – hides owners, request they send you site owner information
 - Lead Gen Committee Resources

Successful Remediation Tactics

- Hosting Providers
 - Find out who the current hosting provider is (ICANN)
 - Bringing all the required information the hosting provider needs to act. DMCA, Trademark Information, Cloudflare Tickets, IP address, Screenshot of the infringing information
 - Send the required information to the hosting provider the way they prefer to receive the information (Ticket, Email, Website)
 - Understand some hosting providers are in other countries and do not speak perfect English. They use translation services to translate your emails and tickets so be very clear and direct for the best results.

Successful Remediation Tactics

- Registrars
 - If dealing with a hosting provider that refuses to comply with DMCA laws or non-responsive, go to the Registrar
 - Registrars are not technically responsible for the infringing website, but many do not wish to be associated with infringing or illegal information
 - Explain you have been dealing with a hosting provider who is nonresponsive or will not remove the content. Show all the information sent to the hosting provider. Registrars may in good faith help disable the domain from their end.

Recent Enforcement Considerations

- Lessons from the CARES Act
 - Roughly \$100 Billion Dollar Lending Program
 - 500 individuals charged with PPP fraud amounting to roughly \$600 million recovery.
 - SBA, through rule making, indicated that PPP lenders “will be held harmless for borrowers’ failure to comply with program criteria” and can rely on borrower certifications, and that “[t]he Administrator will hold harmless any lender that relies on . . . borrower documentations and [an] attestation from the borrower.”
 - These assurances from SBA did not necessarily preclude an investigation or enforcement action by DOJ, a separate agency.
 - Lenders were still required to comply with their Bank Secrecy Act (BSA)/Anti-money Laundering and Customer Identification Program obligations.

Recent Enforcement Considerations

- The PPP Has Turned Attention to Fintechs:
 - A recent study by the University of Texas at Austin found that fintech lenders were three times more likely to have issued suspicious loans.
 - The House Select Subcommittee on the Coronavirus Crisis opened a probe in May into four firms that handled a combined \$20.5 billion in loans: Kabbage, BlueVine, Cross River Bank and Celtic Bank. In November, it added to two other startups that processed one-third of all PPP loans issued in 2021, including Blue Acorn.
 - Many of these companies conducted largely automated reviews with lending components such as the KYC process.
- Because of the potential of wider fraud committed during PPP, regulators are casting more scrutiny on fintechs generally as regulators gain more of an understanding of technology and business models.
- Reuters recently reported that Kabbage is under investigation by the Department of Justice for its PPP Lending practices.

Questions/Discussion

If you would like to ask a question, you can ASK or type your question into the CHAT feature NOW.