CFPB CONSUMER COMPLAINT DATABASE · INDEPENDENT ANALYSIS

Where Consumer Banking Breaks

When the fix is the failure: what 446,614 complaints say about credit-card disputes

REPRODUCIBLE · SNAPSHOT 2026-07-20

446,614 COMPLAINT RECORDS
CREDIT CARDS + CHECKING/SAVINGS · 36 FULL MONTHS
16 LABELED COMPANIES · NO INSTITUTION NAMED

THE QUESTION

Complaint data is usually read as a scoreboard. That wastes it.

Bigger banks get more complaints because they have more customers — raw counts rank size, not quality. **This analysis never ranks volumes.**

What the data is actually good at:

- which product experiences break,
- how fast they are breaking,
- and whether institutions handle the same failure differently.

Scope choice — ~88% of this database is credit-reporting disputes, largely a credit-repair-industry artifact. This project scopes to the two banking products a consumer bank actually operates: **credit cards and checking/savings.**

11.87M

complaints in the full database, all products, this window

446,614

in scope: the two core consumer banking products

METHOD

Built to survive cross-examination

01	**Verified pull**	Bulk export filtered to 446,614 rows; counts verified against the CFPB's own API (channel skew found and documented, not ignored).
02	**Rates, not counts**	Every cross-company comparison is a share of that company's own complaints — company size divides out.
03	**Anonymized institutions**	Top 16 companies labeled Company A–P by volume; behavior patterns, not brand scoreboards.
04	**Narratives = hypotheses only**	225K consumer narratives cluster into failure modes (TF-IDF + NMF, hand-labeled). Never used as prevalence evidence.
05	**Artifact detection**	Publication lag cut, partial quarters dropped, and one coordinated complaint campaign caught and excluded from trends.

CFPB CONSUMER COMPLAINT DATABASE · SNAPSHOT 2026-07-20 · WINDOW 2023-06-01 TO 2026-05-31 · INSTITUTIONS ANONYMIZED · PIPELINE: SRC/ · DECISIONS: DECISIONS.MD D1–D12

Complaints about both products grew sharply

+70%

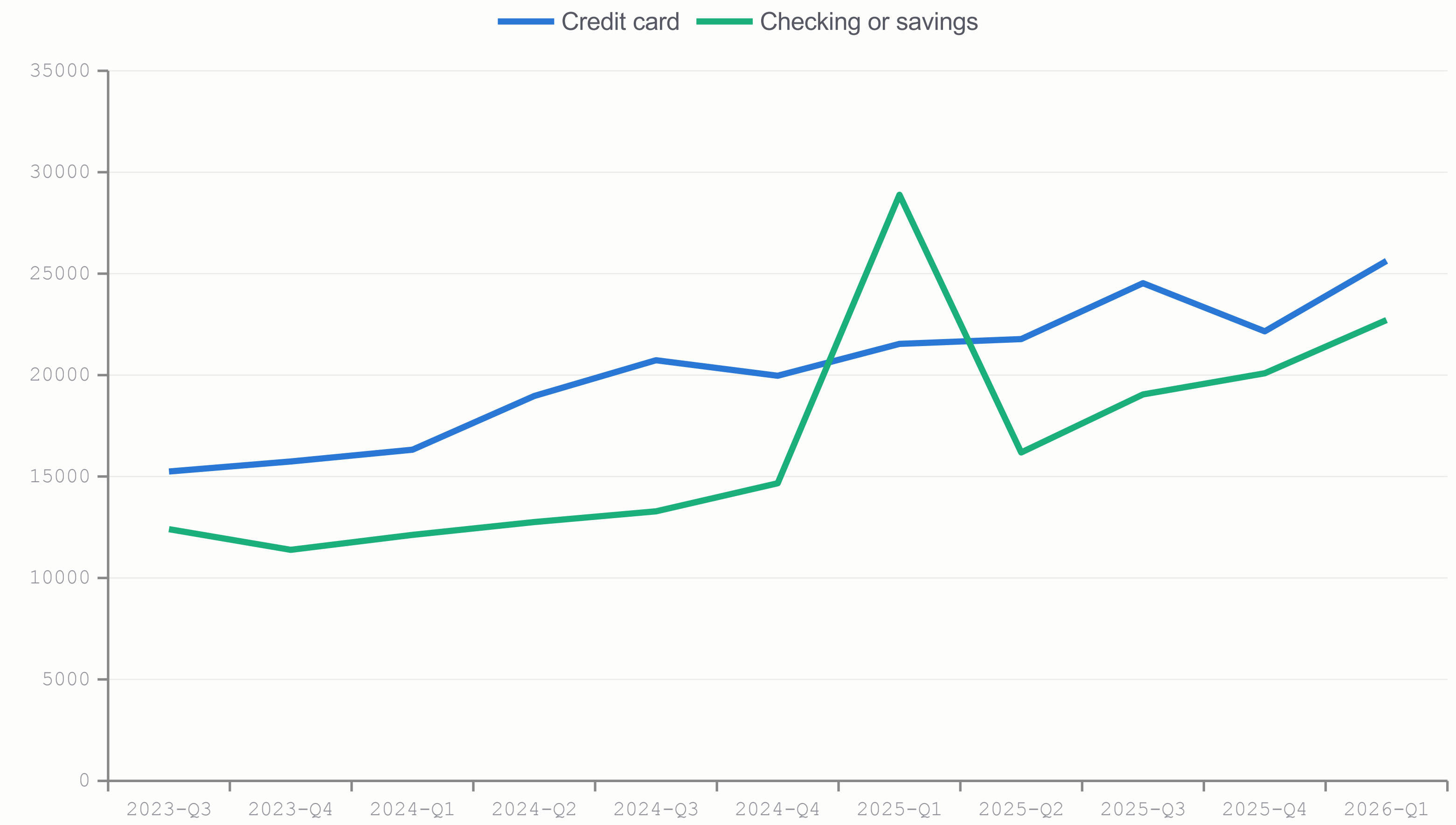
checking/savings complaints, last 12 months vs first 12

+48%

credit-card complaints, same comparison

Growth alone proves nothing about quality — propensity to complain moves too. What matters is where the growth concentrates.

EXHIBIT A2 **Complaints per full quarter**



Jan-2025 campaign spike visible in checking — see next page

CFPB CONSUMER COMPLAINT DATABASE · SNAPSHOT 2026-07-20 · WINDOW 2023-06-01 TO 2026-05-31 · INSTITUTIONS ANONYMIZED · SOURCE: 01 [A2]; QUARTERLY SUMS, FULL QUARTERS ONLY

January 2025: a complaint campaign, not a trend

3.58×

checking complaints vs neighboring months, in one month

66%

of the spike concentrated in just two institutions

38.6%

of their narratives that month are exact duplicates (baseline: 0.1%)

EVENT · EXCLUDED FROM TRENDS

Why this page exists — complaint volume responds to organization and salience, not just product friction. The clustering isolated the campaign template as its own cluster: 99% of it was received in that single month. Every trend claim in this deck excludes the event. Finding your own confound beats having it found for you.

One card issue is both the largest and the fastest-growing

“Problem with a purchase shown on your statement” — the transaction dispute

---

56,242

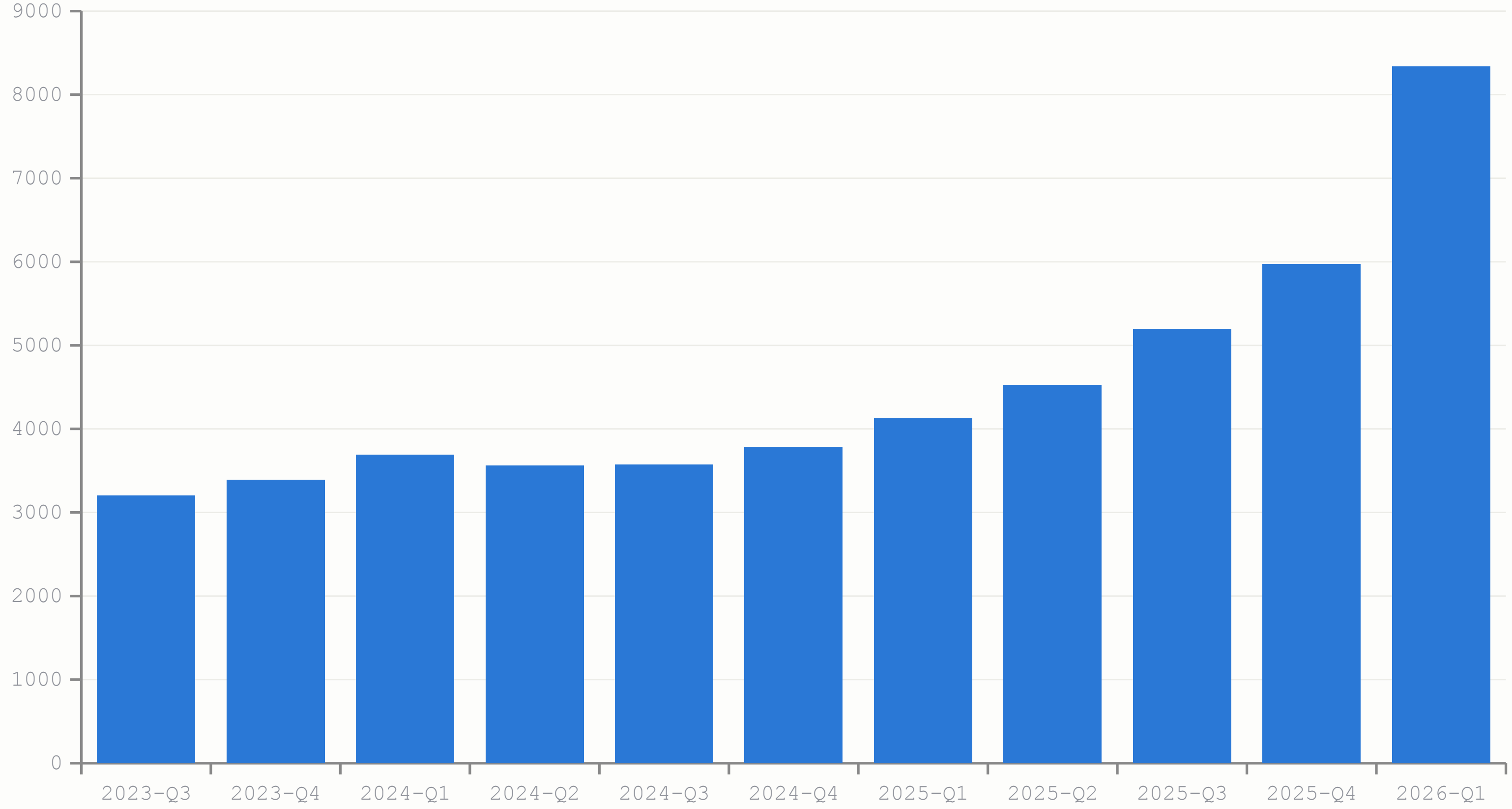
dispute complaints — 23.1% of all card complaints

~2.8×

monthly volume: 1,040 → 2,955 complaints/month, first → last month of the window

Mix share rose 21.2% → 28.0% (first vs last 12 months) — not just complaint inflation.
Not one issuer's outbreak: drop any single company and the share gain stays +6.1pp to +7.4pp.

EXHIBIT D3 **Card dispute complaints per full quarter**



The complaint is about the process, not the charge

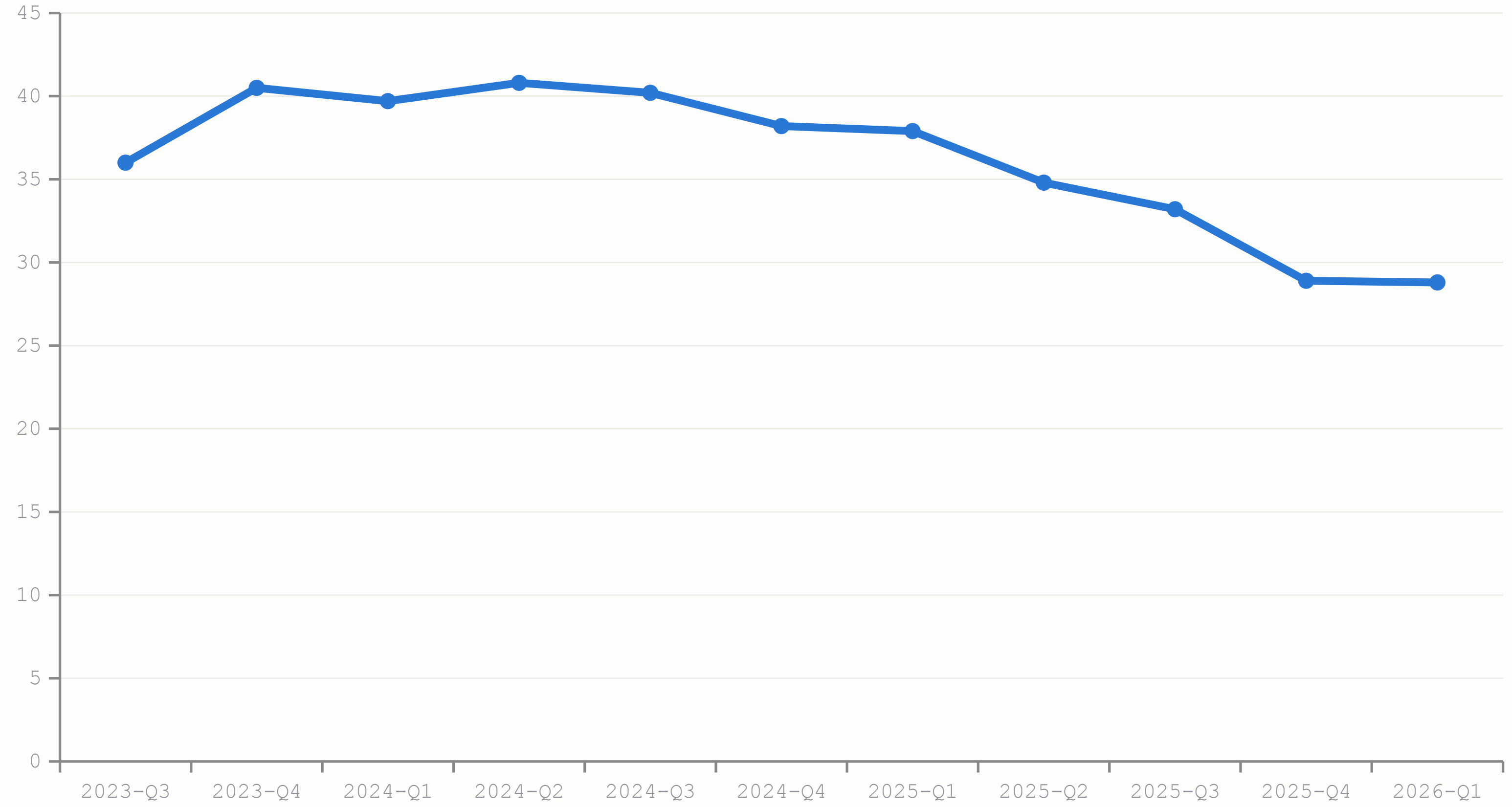
74.2%

of dispute complaints carry the sub-issue "company isn't resolving a dispute" — vs 22.9% for the unauthorized charge itself

And the odds are worsening — relief on closed dispute complaints fell 39.3% → 30.9% (first vs last four full quarters); still 35.8% excluding the two most recent quarters as a recency guard.

Stated honestly — relief fell on other card issues too (38.4% → 30.9%): a card-wide hardening. Disputes are where the volume concentrated while it happened.

EXHIBIT D3 **% of closed dispute complaints ending in relief, pooled**

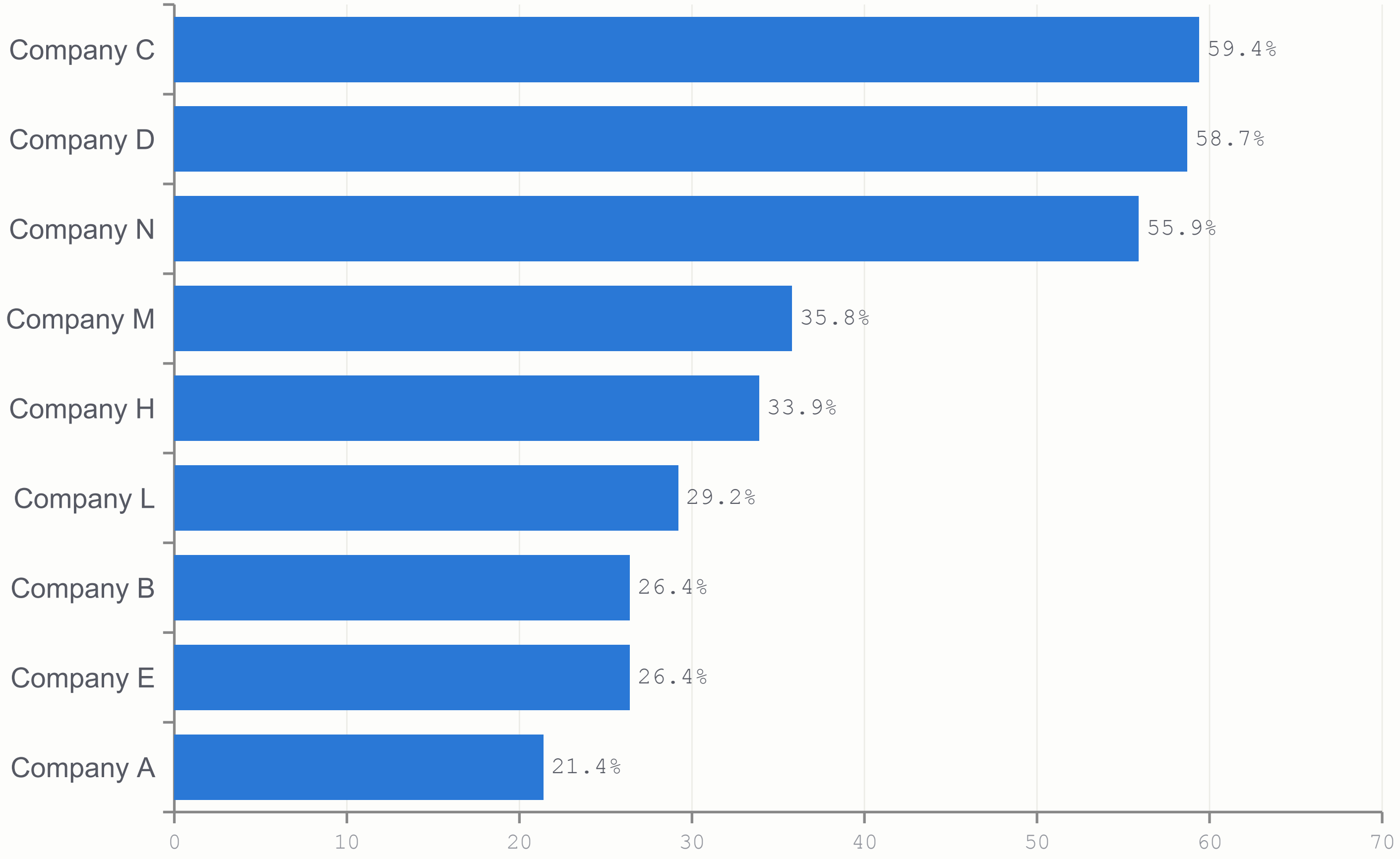


CFPB CONSUMER COMPLAINT DATABASE · SNAPSHOT 2026-07-20 · WINDOW 2023-06-01 TO 2026-05-31 · INSTITUTIONS ANONYMIZED · SOURCE: 04 [D2]; RELIEF = (MONETARY + NON-MONETARY) / CLOSED; IN-PROGRESS AND NO-RESPONSE ROWS EXCLUDED FROM THE DENOMINATOR

THE FINDING · 3 OF 3

Same dispute, same regulator — very different odds by issuer

EXHIBIT D5 **% of closed dispute complaints ending in relief**



issuers with ≥1,000 closed dispute complaints

21–59%

relief range across major issuers on this one issue — a 2.8× spread

Nearly every complaint is answered on time (99.4% timely). The divergence is in what the answer is — institutional behavior, not responsiveness. Dispute-mix differences across issuers can explain part of the spread; that residual is acknowledged, not modeled.

CFPB CONSUMER COMPLAINT DATABASE · SNAPSHOT 2026-07-20 · WINDOW 2023-06-01 TO 2026-05-31 · INSTITUTIONS ANONYMIZED · SOURCE: 04 [D5]; AT A LOOSER ≥300-CLOSED FLOOR THE SPREAD IS 3.9–59.4% ACROSS 13 COMPANIES

WHAT BREAKS, IN CONSUMERS’ OWN WORDS

Five recurring failure modes

36%	**Process breakdown** status black box, repeat contacts, closed without a fix	→ TARGETED
20%	**Evidence ignored / claims denied** documentation submitted, then denied as “authorized”	→ TARGETED
20%	**Merchant fulfillment disputes** goods, travel, and store-card refunds	
14%	**Fraud and identity events** fraud waves, identity theft with police reports	
10%	**Billing continues during dispute** interest, late fees, credit dings on disputed amounts	→ TARGETED

> *“They’re holding me accountable for the charges that were fraud even though I’m providing all the documentation such as police report…”* — PUBLIC COMPLAINT 7160831

CFPB CONSUMER COMPLAINT DATABASE · SNAPSHOT 2026-07-20 · WINDOW 2023-06-01 TO 2026-05-31 · INSTITUTIONS ANONYMIZED · SOURCE: 03B [C3]; SHARES OF 24,910 USABLE NARRATIVES — SELF-SELECTED; NAMES FAILURE MODES, DOES NOT MEASURE PREVALENCE

RECOMMENDATION — DRAFT, BEING REWRITTEN IN MY OWN VOICE

Rebuild the dispute flow as a tracked, evidence-first process

01

Structured evidence intake
Branch by dispute type; name the documents that matter; confirm receipt of each item.

02

Visible status tracker
Stage, regulatory clock, and next owner — the pattern that fixed package anxiety.

03

Reason-coded outcomes
Denials state the evidence relied on and the concrete path to reassert. No boilerplate.

04

Billing integrity by default
Interest, fees, and delinquency reporting on disputed amounts pause automatically until resolution.

Deliberately cut — no changes to adjudication models or approval thresholds (legibility, not generosity) · no merchant-side tooling · no promised faster decisions.

Targets the 36% process-breakdown cluster (tracker), the 20% evidence cluster (intake + reason codes), and the 10% billing cluster (automatic pause).

MEASUREMENT — EVERY METRIC IS A HYPOTHESIS

How we’d know it worked — and what would kill it

PRIMARY

- Repeat contacts per dispute case
- CFPB complaints per 10,000 disputes filed

GUARDRAILS

- Dispute approval rate — must stay flat
- Fraud-loss rate (watch the billing pause)
- Cost per dispute · post-dispute NPS

KILL CRITERION

- If repeat contacts don’t fall in an A/B of tracker + reason-coded letters, the transparency thesis is wrong

VALIDATION WITH INTERNAL DATA — THE THREE PULLS I’D RUN FIRST

- Contact funnel — status-inquiry contacts per case vs subsequent CFPB escalation (tests “opacity, not outcomes” directly)
- Denial reason codes joined to CFPB complaints within 90 days (finds the highest-leverage letter to fix)
- Billing-pause audit — how often interest/fees continued on disputed billing-error amounts

LIMITATIONS

Read before reusing any number

01

Counts ≠ quality
Complaint volume scales with company size. No volume rankings exist in this project; per-customer normalization was deliberately not faked.

02

Narratives are self-selected
Used to name failure modes only — never as prevalence evidence.

03

Publication lag
Complaints publish after response or 15 days; the window ends 50 days before the pull, and partial quarters are dropped.

04

Large-institution bias
Complaints referred to other regulators — incl. most sub-$10B banks — are absent.

05

Surfaced ≠ existing friction
Complaint propensity varies; the Jan-2025 campaign is the in-sample proof. Trends exclude it.

06

No causal claims
Relief differences are associations; the card-wide relief decline is unexplained. Even the two CFPB channels disagree by ~0.5% (documented).

Reproduce any number: `./run_all.sh` — every claim cites its script and cell.