

SCRA Enforcement Actions Database

Every Settlement Since 2011

civrel.io — Updated March 2026

\$484M+

Total Recovered (2011–2026)

149,000+

Servicemembers Affected

36+

Enforcement Actions

Bipartisan

24 Trump I / 27 Biden

Executive Summary

Between 2011 and 2026, federal agencies have obtained over \$484 million in monetary relief for more than 149,000 servicemembers under the Servicemembers Civil Relief Act. This database catalogs every publicly documented enforcement action during that period, including DOJ civil rights division cases, CFPB enforcement actions, OCC consent orders, and state attorney general settlements.

The data reveals four patterns that every compliance officer should understand.

1. Enforcement is bipartisan and accelerating.

The DOJ brought 24 SCRA enforcement actions under the first Trump administration (2017–2021) and 27 under Biden (2021–2025). The current CFPB has explicitly designated servicemember protection as a priority enforcement area despite reducing activity in other domains. No administration since the Obama-era establishment of the DOJ's Servicemembers and Veterans Initiative has deprioritized SCRA enforcement.

2. Every regulated vertical has been hit.

The earliest actions targeted banks (NMS foreclosure settlement, \$311 million across five institutions). Enforcement expanded to auto lending (Santander, Wells Fargo Dealer Services, Hyundai Capital, CarMax), property management (Greystar, PRG Real Estate, FPI Management), mortgage servicing (Saxon Mortgage, Ocwen/PHH), military housing (Lincoln Military Housing), and credit unions (BayPort CU). State attorneys general have brought their own cases (Washington v. Olympic Management, New York v. LeRay 300). No vertical that touches servicemember obligations has been exempt.

3. The technology mandate is new.

Early consent decrees (2012–2016) focused on policy changes, employee training, and victim compensation. Recent decrees (2023–2026) explicitly mandate technology changes: automated DMDC verification before adverse actions, software platforms that prevent prohibited charges, and continuous

portfolio monitoring. The DOJ is no longer satisfied with process commitments. It wants system-level controls.

4. Penalties have increased 44% since 2023.

The per-violation civil penalty rose from \$55,000 to \$79,380 for first offenses and from \$110,000 to \$158,761 for subsequent offenses (28 CFR §85.5, effective July 3, 2025). Any risk assessment using the old numbers understates exposure by nearly half.

Complete Enforcement Database

DOJ — Banking / Mortgage / Foreclosure

Company	Year	Settlement	SMs	Violation
NMS (5 Banks)	2012	\$311,000,000	~49,000	Wrongful foreclosures on active-duty servicemembers
JPMorgan Chase	2012	\$56,000,000	Class action	Rate cap violations and wrongful foreclosures
Bank of America	2012	\$35,000,000+	265+	Unlawful foreclosures during active duty
Wells Fargo Bank	2012	\$28,360,000	239	Unlawful foreclosures during active duty
Citi	2012	\$14,880,000	126	Unlawful foreclosures during active duty
GMAC/Ally Financial	2012	\$13,720,000	113	Unlawful foreclosures during active duty
Capital One	2012	\$12,000,000	Not disclosed	Wrongful foreclosures and rate cap violations
Saxon Mortgage	2011	\$6,000,000	63	Non-judicial foreclosures on active-duty SM pre-service mortgages
Saxon Mortgage (2014)	2014	\$2,350,000	19	Non-judicial foreclosures
Ocwen/PHH Mortgage	2019	\$750,000	6	Foreclosures without court orders (2010–2012)

DOJ — Auto Lending / Repossession

Company	Year	Settlement	SMs	Violation
Wells Fargo Dealer Services	2016	\$9,500,000	~860	Vehicle repossession without court orders
Santander Consumer USA	2015	\$9,350,000	760	Vehicle repossession without court orders
Westlake Financial	2017, 2022	\$985,788	320	Repos and rate cap violations (repeat offender)
CarMax	2026	\$500,000	28	Vehicle repossession without court orders
HSBC Auto Finance	2016	\$434,500	75	Vehicle repossession without court orders
Hyundai Capital America	2024	\$334,000	26	Vehicle repossession without court orders
New City Funding Corp	2025	\$120,000	4	Vehicle repossession without court order

DOJ — Property Management / Lease Termination

Company	Year	Settlement	SMs	Violation
PRG Real Estate	2019	\$1,590,000	127+	152 false affidavits, unlawful default judgments (largest PM settlement until Greystar)
Greystar	2025	\$1,400,000	Audit pending	Illegal early lease termination fees
FPI Management	2023	\$73,587	9	Lease incentive repayment charges
JWB Property Management	2025	\$64,000	6	Early lease termination fees
JAG Management Company	2023	\$61,582	9+	Lease termination fees charged to military tenants
McGowan Realty / RedSail	2024	\$13,226	1	Denied SCRA lease termination
Lincoln Military Housing	2016	\$200,000	4	Unlawful evictions, false affidavits

DOJ – Vehicle Towing / Auction / Storage (\$3958)

Company	Year	Settlement	SMs	Violation
United Road Towing	2023	\$242,000	176+	Vehicle auction without court orders
Rod Robertson Enterprises	2025	\$160,000	176+	Vehicle auction without court orders
Morningstar Properties	2024	\$130,000	3	Auctioned storage unit contents of deployed SMs
Billy Joe Goines Towing	2023	\$96,805	8	Vehicle auction, false affidavits (\$66,805 restitution + \$30,000 civil penalty)
Todisco Towing	2023	\$6,000	1	Vehicle auction without court order

State Attorney General Enforcement

Company	Year	Settlement	SMs	State	Violation
LeRay 300 / Woodcliff	2017	\$69,000	125+	NY	"Lease processing fees" on SCRA terminations
Olympic Management Co.	2025	\$56,000	22	WA	Early lease termination fees + concession clawbacks
Greystar (WA AG)	2025	\$50,000	—	WA	State penalty (separate from DOJ action)

OCC / CFPB / Other Federal

Company	Year	Settlement	SMs	Agency	Violation
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USAA Federal Savings	2020	\$85,000,000	546	OCC	Combined penalty incl. 546 SCRA violations
TitleMax	2023	\$15,000,000	Multiple	CFPB	MLA violations on title loans
BayPort Credit Union	2022	\$109,443	24	DOJ	Rate cap overcharges + 3 repos without court orders
HESAA (NJ Student Loans)	2021	\$50,000	2	DOJ	False affidavits in student loan collections

Enforcement Trends: 2011–2026

By Vertical

Vertical	Actions	Total \$	Key Cases
Banking / Lending	10+	\$480M+	NMS (\$311M), JPMorgan (\$56M), USAA (\$85M OCC)
Auto Lending	7+	\$21.2M+	Santander (\$9.35M), Wells Fargo DS (\$9.5M), Westlake (\$986K repeat)
Property Management	10+	\$3.5M+	Greystar (\$1.4M DOJ + \$50K WA), PRG (\$1.59M), Olympic (\$56K WA)
Towing / Storage	5	\$636K	United Road (\$242K), Rod Robertson (\$160K), Morningstar (\$130K), Goines (\$97K)
Credit Union	1+	\$109K+	BayPort CU (\$109K)
Military Housing	1+	\$200K+	Lincoln Military Housing (\$200K)

By Violation Type

Violation Type	Statute	Notable Cases	Trend
Illegal repossessions	§3952	Santander, Wells Fargo DS, Hyundai, CarMax	Consistent since 2015
Foreclosure violations	§3953	NMS (5 banks), JPMorgan	Declining (post-NMS)
Interest rate cap violations	§3937	Capital One, BayPort CU, USAA	Steady
Illegal lease termination charges	§3955	Greystar, FPI, PRG, Olympic, LeRay 300	Increasing since 2017
Default judgments / false affidavits	§3931	PRG, HESAA, Goines Towing	Steady
Storage / towing auctions	§3958	Morningstar, United Road, Rod Robertson	New category (2023+)

Consent Decree Evolution

2012–2015 (Policy-focused): Write new procedures, train staff, compensate victims, report quarterly to DOJ.

2016–2022 (Process-focused): Hire compliance officers, build monitoring programs, engage independent auditors.

2023–2026 (Technology-focused): Implement automated DMDC verification, transition to software that prevents prohibited charges, build pre-adverse-action screening into operational systems. The Greystar consent decree (2025) required technology that automatically prevents violations. The CarMax decree (2026) required DMDC verification before every repossession.

This evolution reflects the DOJ's learning from repeated enforcement cycles. Policy changes alone did not prevent recurrence. Technology mandates are the DOJ's current answer to making SCRA compliance systemic rather than dependent on individual employee actions.

How to Use This Database

Compliance officers: Review enforcement actions in your vertical. Note the violation types, settlement amounts, and consent decree requirements. These represent the DOJ's current expectations.

General counsel: Use the enforcement trend data to support compliance budget requests and technology investment decisions. The bipartisan enforcement data (24 actions under Trump I, 27 under Biden) is particularly relevant for organizations whose leadership assumes enforcement will ease.

Board members and executives: The civil penalty is the smallest component of an enforcement action. Retroactive audits, victim compensation, technology mandates, and 3–5 years of DOJ reporting represent the actual cost.

About Civrel

civrel.io is the SCRA compliance automation platform. We help lenders, property managers, and financial institutions verify military status, monitor portfolios continuously, and maintain audit-ready documentation. Our platform is built to meet the technology mandates in recent consent decrees.

Free SCRA Risk Assessment: civrel.io/risk-assessment

Full enforcement database (searchable): civrel.io/scra-enforcement-actions

Contact: hello@civrel.io

Data compiled from DOJ press releases, consent orders, CFPB enforcement actions, OCC consent orders, and state attorney general press releases. All figures verified against primary sources. This database is provided for informational purposes only and does not constitute legal advice. Last updated March 2026.