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REPLY TO: HAMPTON ROADS OFFICE

February 25, 2015

Christopher D'Angelo,
Chief of Staff
c/o Crystal Dully, Policy Assistant
Consumer Financial Protection Bureau,
1700 G Street NW.,
Washington, DC 20552

Re: Consumer Advisory Board Application of Tom Kline

Dear Mr. D'Angelo:

I am writing to unconditionally recommend Tom Kline for a position on the Consumer Advisory Board. My own background is as a consumer protection attorney, former member of the NACA Board of Directors, and current member of the NCLC Partner's Council and Public Justice Foundation.¹ A primary focus of my work has been on behalf of U.S. servicemembers. My recommendation of Mr. Kline, a well-respected Hampton Roads businessperson who has worked with our military community and offers unique financial services experience, is because of that focus.

I have known Mr. Kline professionally for more than fifteen (15) years. We met initially as adversaries – we had sued his family-owned car dealership on behalf of a servicemember. His approach at handling and fully remediating the problems for that servicemember led to a long series of communications, discussions and ultimately a professional friendship. His understanding of the consumer credit issues faced by my client, other servicemembers and consumers generally was remarkable, insightful and empathetic. As a frequent advocate on the consumer rights of our men and women in the military, I strongly urge your consideration of Mr. Kline's application if for no other

¹ I have been previously invited to and did speak before the CAB, as well as the Federal Trade Commission and the House Financial Services Committee.

reason than his deep and unique background helping and working with Navy, Air Force and Army servicemembers. I recognize that you may receive applications from others with some connection with servicemembers. However, I cannot imagine a better opportunity than to include a local business leader from our community with its unique concentration of military consumers.

Tom's family's business has certainly originated thousands of consumer financings through new and used automobile dealership. He thereby has business experience both as an indirect lender and with a buy-here-pay-here subsidiary. His role in those businesses has included counseling consumer customers with their pre-existing credit and debt issues, as an actual creditor needing to originate and collect both prime and sub-prime debt and as a regular user of consumer credit reporting and scoring.

I recognize that the mission of the CFPB is more limited as it pertains to automobile dealers. However, obviously auto financing is, along with home mortgages and credit cards, one of the most important forms of consumer credit. For the servicemembers and the working-class client base I represent in Hampton Roads, use of credit for automobile purchases is as critical and telling as any other use. I have observed that Mr. Kline's knowledge in this field is unmatched within our business community. He has an actual substantive knowledge of the full lifecycle of consumer credit.

While Mr. Kline's knowledge and experience should provide a sufficient basis to accept his application to serve, you will actually have to work with your board members during their term. And so I should also note a few of Tom's important and defining personal traits that you would discover. Tom is a fantastic combination of knowledge, humility, reason and compassion. He has demonstrated a high sense of ethics and a commitment to compliance for many years. He brings a balanced view and presents his ideas in a way that is respectful of others. He is interesting, witty and someone you will be pleased to have added, and disappointed to see go. I ask that you consider and approve Mr. Kline's application. The CFPB, the Consumer Advisory Board and consumers generally will benefit from such decision.

I am available to discuss my recommendation and experiences by telephone or e-mail at your convenience. With regards, I am,

Very truly yours,



Leonard A. Bennett

cc: Delicia (Reynolds) Hand
Staff Director, Consumer Advisory Board