

State Watch: Consumer Protection Enforcement Update

October 8, 2025 | [Anastasia V. Caton](#)

September 2025: Alaska's AG touts its investigative authority, Oregon's legislature considers whether additional state resources and legislation are needed to fill the federal gap in consumer protection enforcement, and privacy practices remain a bipartisan focus

Alaska

Alaska Attorney General Cox won a favorable judgment in the Alaska Supreme Court affirming the authority of the AG's office to investigate violations of Alaska's consumer protection laws. Following consumer complaints about a dealership's alleged practice of charging "hidden fees," the Consumer Protection Unit of the AG's office subpoenaed documents from the dealership. The CPU sought information concerning the dealership's pricing and advertising practices. According to AG Cox, the dealership refused to comply. The AG's office sued to enforce the subpoena. The Alaska Supreme Court held that the complaint and evidence justified the subpoena and ordered the dealership to comply. The AG's office will now move forward with their investigation. Most notably, AG Cox issued a press release touting this victory, saying "the Alaska Supreme Court upheld the Attorney General's authority to demand records in consumer protection investigations."

California

The California Department of Financial Protection and Innovation entered into a \$2.3 million settlement with a mortgage lender and servicer over claims that the company charged excessive interest on loans for a seven-year period and failed to follow certain required trust accounting practices. The company will pay \$1.8 million in penalties and refund over \$550,000 to impacted consumers. It will also surrender its California Financing Law License and Residential Mortgage Lender and Servicer license.

The California Privacy Protection Agency Board ordered a rural lifestyle retailer to pay a \$1.35 million fine for alleged violations of the California Consumer Privacy Act. In addition to the fine, the agency ordered the company to change its business practices to comply with the statute. According to the CPPA, its investigation began when a consumer made a complaint. The CPPA claims that the company failed to maintain a privacy policy that notified consumers of their rights, failed to notify job applicants of their privacy rights and how to exercise them, failed to provide consumers with an effective mechanism to opt out of the selling and sharing of personal information, and disclosed personal information to other companies without entering into contracts that had privacy

protections. The fine is the CPPA's largest to date.

Kansas

Kansas Attorney General Kobach sued a social media company over allegations that the company falsely represented its platform as safe for teenagers, when it was, according to AG Kobach, "intentionally designed to be addictive, which is harmful to young minds." AG Kobach claims that the company violated Kansas's Consumer Protection Act and seeks a permanent injunction as well as civil penalties of \$10,000 per violation along with additional penalties of \$10,000 per violation committed against a protected consumer. The AG's office hired an outside law firm to assist in bringing the case.

Massachusetts

On September 2, 2025, Massachusetts Attorney General Campbell issued a statement commemorating the effective date of the state's new junk fee regulation. In her statement, AG Campbell said "these historic regulations not only provide individuals upfront transparency about the true cost of a good or service, but level the playing field for businesses by promoting trust and fair competition." She also encouraged consumers and businesses to consult with the compliance resources provided by her office, and emphasized that the AG's office is ready to enforce the new regulation immediately.

Oregon

The Oregon legislature recently held informational meetings to discuss how the state can bolster consumer protection as the federal enforcement and regulation grinds to a halt. Oregon's Interim House Committee on Commerce and Consumer Protection invited the following speakers to the meetings: Attorney General Rayfield; Leslie Wu, a policy advisor to AG Rayfield; Samuel Levine, former Director of the Federal Trade Commission's Bureau of Consumer Protection; Jesse O'Brien, a policy manager at the Department of Financial Regulation; and Nicole Ferroux, a senior policy advisor at the DFR. Some of the key takeaways from the meetings:

- AG Rayfield said that recent appropriations have allowed his office to double the capacity of its consumer protection division. AG Rayfield also said that his office anticipates potentially hiring some former federal employees.
- AG Rayfield identified a "retreat" at the federal level as necessitating increased activity at the state level and indicated that he is coordinating with attorneys general in other states to fill the federal gap.
- Ms. Wu said that the top consumer complaints to the AG's office in 2024 included auto sales and repairs (#3) and financial lending and credit (#4).
- Former Director Levine pointed out that even a fully-staffed FTC cannot fill the void left by the federal Consumer Financial Protection Bureau. He urged Oregon's legislature to step in, and identified certain deficiencies in the Oregon Unlawful Trade Practices Act, including that it exempts insurers and pawnbrokers, makes it "difficult" for consumers to take action, and lacks enhanced penalties for

vulnerable consumers (such as servicemembers and the elderly).

- Mr. O'Brien described consumer protection as an "orphan" at the federal level prior to the advent of the CFPB. He also said that the DFR coordinates closely with the Oregon Department of Justice on consumer protection policy and enforcement.
- Ms. Ferroux explained that the DFR does not enforce the UTPA, but that generally Oregon has broad consumer protection laws. She told legislators that the DFR is closely monitoring the federal rollback of consumer protections and stands ready to report to the legislature any changes that would require the state legislature to fill the gap. She also noted that the DFR is implementing new software tools that can ease staffing concerns.

Multistate

California Attorney General Bonta, the California Privacy Protection Agency, Colorado Attorney General Weiser, and Connecticut Attorney General Tong announced an investigative sweep involving compliance with the Global Privacy Control browser setting that automatically tells businesses to stop selling or sharing a consumer's personal information to third parties. The regulators sent letters to businesses that they believe are not complying with consumer requests. The letters demand immediate compliance.

To stay up-to-date on the latest in state enforcement trends, make sure to register for Hudson Cook's 21st Annual Financial Services Conference, which takes place November 2-4, 2025 in Baltimore. Click here to learn more about Hudson Cook's State Enforcement Practice.

Hudson Cook, LLP provides articles, webinars and other content on its website from time to time provided both by attorneys with Hudson Cook, LLP, and by other outside authors, for information purposes only. Hudson Cook, LLP does not warrant the accuracy or completeness of the content, and has no duty to correct or update information contained on its website. The views and opinions contained in the content provided on the Hudson Cook, LLP website do not constitute the views and opinion of the firm. Such content does not constitute legal advice from such authors or from Hudson Cook, LLP. For legal advice on a matter, one should seek the advice of counsel.

SUBSCRIBE TO INSIGHTS

HUDSON COOK

Hudson Cook, LLP is a national law firm representing the financial services industry in compliance, privacy, litigation, regulatory and enforcement matters.

7037 Ridge Road, Suite 300, Hanover, Maryland 21076
410.684.3200

hudsoncook.com

© Hudson Cook, LLP. All rights reserved. Privacy Policy | Legal Notice
Attorney Advertising: Prior Results Do Not Guarantee a Similar Outcome

