PREFACE

Compliance with the myriad laws and regulations remains a paramount ingredient in the legal collections process. Despite its apparent demise several times, the CFPB continues its enforcement activities. More than 300,000 complaints were filed in the past year against collectors alleging collector violations of the FDCPA. There were 4,534 federal court actions filed against collectors in 2025, a 7.8 percent increase over 2024.

An 8th Circuit decision was filed requiring that the collector conduct be "material" before it is actionable. *See* Hill v Account Receivable Services, LLC, No. 16-4356 (8th. Cir. 2018). Allegations of false and misleading statements failed to meet a materiality standard. That case and others are discussed in this volume.

On the State level, Minnesota Courts have now updated their standard forms around Demands for Disclosure. *See* Court Form JGM306.