

The OCC Finalizes a Rule to Answer the True Lender Question

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If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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¹ See e.g., a statement by the [National Consumer Law Center](#).

- Is named as the lender in the loan agreement; or
- Funds the loan.

² Sen. Sherrod Brown's [statement](#) on October 27, 2020.

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