

## Consumer Debt Litigation Index

### Top Recommendations for Reform in Maryland

**Maryland's Score: 38/100**

**Maryland's National Rank: 4th**

Consumer debt lawsuits dominate civil court dockets across the country. In an overwhelming number of cases—more than 70% in many places—the people sued do not respond or defend themselves. As a result, courts often enter default judgments without determining whether the defendant even knows about it, it is timely, or has merit. In turn, people face high fees and interest, onerous payment plans, seizure of wages and possessions, and potential imprisonment. States across the country have established laws and practices aimed at reducing unjust lawsuits and producing fairer outcomes. To support states in their respective efforts, the National Center for Access to Justice in 2024 created the Consumer Debt Litigation Index in consultation with a panel of experts. The Index ranks the states on their progress in adopting 24 best policies (“benchmarks”) for fairness. See our Top Recommendations and Complete Findings, below.

#### 1. Establish Pleading Requirements (Benchmark 6)

**Why:** People facing debt collection lawsuits often have difficulty understanding the claim against them. Lax pleading requirements also invite illegitimate lawsuits. Requiring complaints to name the original creditor, demonstrate ownership of the debt, and break out the specific amounts sought can deter meritless filings and enable defendants to assert legitimate defenses, promoting fairness. Delaware, New Mexico, New York, and Washington, D.C. all require complaints to include these key elements. Although Maryland already requires that a consumer debt action plead both the original creditor and the basis for plaintiff's standing, it does not require that a consumer debt complaint contain an itemization of the amounts sought.

**How:** Maryland should adopt a law or practice that requires plaintiffs in consumer debt cases to allege in the complaint an itemization of the amount sought, including debt principal, interest, fees, costs, and other charges to date. If it does so, the state's score would increase 10 points.

#### 2. Require Authenticated Business Records for A Default (Benchmark 7)

**Why:** Creditors too often bring legally insufficient cases, relying on the likelihood that many defendants will not respond (or “default”) and that the merits of the creditors’ claims will never be assessed by a court. Requiring creditors to establish — before a default judgment may be entered — (a) proof of service, (b) validity of the debt using authenticated business records, and (c) itemized amounts sought, also using authenticated business records, promotes fairness, as these required elements deter lawsuits that lack merit and lower the number of unwarranted default judgments. Alaska, Maine, New York, Washington, D.C., Washington State, and Wisconsin all require creditors to prove these essential elements before a court may enter a default judgment. Although Maryland requires that in cases brought by debt buyers, judgment may only be entered where the plaintiff has provided an affidavit and specified documents evidencing the obligation, proper licensure, and the debt buyer’s ownership of the debt, Maryland does not require that debt buyers provide authenticated business records establishing validity of service or an itemization of the amount sought. Further, it meets none of the benchmark requirements for consumer debt cases where the plaintiff is not a debt buyer.

**How:** Maryland should adopt a law or practice that requires plaintiffs in all consumer debt cases to establish the following before a court may enter a default judgment: (a) proof of service; (b) validity of the debt through authenticated business records (e.g. contract, account statements, or other evidence of obligation); and (c) amount of the judgment through authenticated business records, itemizing damages, court fees, attorneys' fees, and interest. If it does so, the state's score would increase 10 points.

### **3. Ensure that Garnishment Exemptions for Bank Accounts Are Self-Executing (Benchmark 14) and Update Garnishment and Attachment Exemptions (Benchmark 15)**

**Why:** Without sufficient protections, garnishment and attachment orders to seize money or assets from a debtor to pay a creditor can leave people unhoused, unable to keep a car to drive to work, and stuck in cycles of poverty. Federal law exempts some funds from garnishment and some property from attachment, but debtors often do not learn what funds and property are exempt or how to assert exemptions. Further, the federal exemptions are out of date and inadequate to preserve even a very basic standard of living. Many states—including California, Idaho, Maryland and Wyoming—make some exemptions “self-executing”, meaning that a bank must protect exempt funds even when the debtor does not assert exemptions (Benchmark 14). Other states have increased garnishment and asset exemptions (Benchmark 15). For example, in consumer debt cases Texas has garnishment exemptions that protect 100% of a person's wages, and attachment exemptions that protect a home (of any value) and personal property (including a car) up to a value of \$100,000 for a family or \$50,000 for an individual. Maryland, however, does not have self-executing bank account exemptions, and it has not increased garnishment and attachment exemptions sufficiently.

**How:** Maryland should make bank account exemptions self-executing. Further, the state should update and expand on garnishment and attachment provisions so that they protect at minimum: (a) Income of at least \$576.92 per week, the minimum to keep a family of four above the federal poverty level, as defined by the U.S. Federal Poverty Guidelines in 2023; (b) a home, regardless of value, or at least the median price of a home in the state; and (c) a car valued up to at least \$15,000. If it does so, the state's score would increase 7 points.

## What Would Happen if Maryland were to Implement these Recommendations?

These three recommendations, if adopted by the state, would substantially increase Maryland's score and ranking. For more on how Maryland can do better, see the complete findings below and visit NCAJ's [Consumer Debt Litigation Index](https://ncaj.org/state-rankings/consumer-debt) at <https://ncaj.org/state-rankings/consumer-debt> or reach out to NCAJ at [NCAJ@fordham.edu](mailto:NCAJ@fordham.edu).

# Complete Consumer Debt Litigation Index Findings for Maryland

## I. Issue Area: Help people know when they are being sued and where to find help.

### 1 - Government Notice of Lawsuits

Score: 0/5

Does the state respond to the problem of ineffective or fraudulent ("sewer") service in consumer debt lawsuits by: a. Public Official Service - requiring that a public official (e.g. the court or the sheriff) handle service? or, b. Court Supplemental Notice - requiring the court to send the defendant, by first class mail, supplemental notice of a new consumer debt lawsuit and deny default judgment if that notice is returned as undeliverable?

No

Maryland does not meet this benchmark because it does not meet either sub-benchmark 1a or 1b. First, sub-benchmark 1a is not met because Maryland permits anyone over 18 who is not a party to serve process. See MD. Rules, Rule 2-123(a). Second, sub-benchmark 1b is not met because Maryland does not require that the court provide supplemental notice of a consumer debt lawsuit, and that default judgment be denied if that notice is returned as undeliverable.

### 2 - Guidance on Finding Help

Score: 0/5

Does the state require that notice to the defendant in a consumer debt lawsuit include guidance on where to seek help, including free legal assistance?

No

Maryland does not meet this benchmark because Maryland does not require that notice in a consumer debt lawsuit provide guidance for defendants on where to find help. See Md. Rules, Rule 2-114; 3-114.

## II. Issue Area: Make it easier to respond to a lawsuit.

**3 - Simplified Answer****Score: 2/2**

Does the state provide a simple Answer process by making available an Answer form for use by unrepresented persons in consumer debt lawsuits?

**Yes**

Maryland meets this benchmark because Maryland has a circuit court form Answer at <https://www.courts.state.md.us/sites/default/files/court-forms/ccdr050.pdf>, and a requirement that district (small claims) court pleadings be "prepared on District Court forms prescribed by the Chief Judge of the District Court." See MD Rules, Rule 3-303. The summons in a district court case includes an "intent to defend" portion, that provides space for a brief explanation of why the defendant does not agree with the claim, which can be cut along a perforated line and returned to the court.

**4 - No Notarization Requirement to Answer****Score: 2/2**

Does the state make it easier to respond to consumer debt lawsuits by never requiring defendants to have an Answer notarized before filing?

**Yes**

Maryland meets this benchmark because it does not require that a pleading be "under affidavit" except when specifically required by rule or statute. See Md. R. Civ. P 1-301(f). No such rule or statute applies to an Answer in a consumer debt litigation.

**5 - No Fee to Answer****Score: 5/5**

Does the state permit the filing of an Answer in consumer debt lawsuits without charging a filing fee?

**Yes**

Maryland meets the benchmark because the Maryland court fee schedule for both small and large claims only includes fees for filings complaints, counter claims and cross claims, and does not indicate any fee to file an answer. MD R. USDCT Civ. Costs, Cost Schedule, effective Sept. 16, 2021. <https://www.courts.state.md.us/sites/default/files/court-forms/dca109.pdf>

## III. Issue Area: Require the creditor to provide evidence of a valid debt claim.

**6 - Pleading Requirement****Score: 0/10**

Does the state require consumer debt complaints to allege all of the following: a. Name of original creditor; b. Basis of plaintiff's standing (e.g. chain of ownership of debt); and c. Itemization of amount sought including debt principal, interest, fees, costs, and other charges to date?

**No**

Maryland does not meet the benchmark because although it requires a consumer debt complaint to include (a) the name of the original creditor and (b) the basis of plaintiffs' standing, it does not require for all complaints to include (c) itemization of the amount sought. Md. R. Civ. P. Dist. Ct. 3-306(b)-(d); Complaint - Assigned Consumer Debt, <https://www.courts.state.md.us/sites/default/files/court-forms/dccv106f.pdf>.

**7 - Authenticated Records for Default****Score: 0/10**

Does the state require the following be established before a default judgment can be granted: a. Proof of Service b. Validity of debt through authenticated business records (e.g. contract, account statements, or other evidence of obligation); and c. Amount of judgment through authenticated business records, itemizing damages, court fees, attorneys' fees, and interest? **No**

Maryland does not meet the benchmark or any sub-benchmarks. Maryland courts may grant default judgment pursuant to MD R. of Civ. Proc. 2-613(f), and this rule does not impose any of the requirements in sub-benchmarks (a) to (c). However, in case of a debt buyer, Maryland requires that, before entry of a judgment on a consumer debt, the complaint be accompanied by an affidavit and specified documents evidencing the obligation, proper licensure, and the debt buyer's ownership of the debt. MD R. of Civ. Proc. 3-306(d)

## IV. Issue Area: Require consumer debt collection actions to be brought within a reasonable time of non-payment.

**8 - Burden on Plaintiff to Allege Timeliness****Score: 0/2**

Does the state place the pleading burden on the consumer debt plaintiff to allege in the Complaint the timeliness of each claim, including each of the following: a. applicable statute of limitations; b. date that claim accrued; and c. date that statute of limitations expires? **No**

Maryland does not meet this benchmark because it does not require a consumer debt plaintiff to allege (a) the applicable statute of limitations, (b) the date the claim accrued, or (c) the date the statute of limitations expires. See Md. R. Civ. P. Dist. Ct. 3-306(c)-(d); Complaint - Assigned Consumer Debt, <https://www.courts.state.md.us/sites/default/files/court-forms/dccv106f.pdf>.

**9 - Four Year Statute of Limitations****Score: 5/5**

Does the state require 4-year (or shorter) statute of limitations for the causes of action most commonly used to pursue consumer debt collection: breach of contract (written or oral), open account, account stated, unjust enrichment, conversion, bad check? **Yes**

Maryland meets this benchmark because it imposes a 4-year (or shorter) statute of limitations for all consumer debt claims. In particular, Maryland has the following limitations periods: • breach of written contract: 3-year limitations period (Md. Code Ann., Cts. & Jud. Proc. § 5-101 (West 2023); *Millstone v. St. Paul Travelers*, 962 A.2d 432, 436 (Md. Ct. Spec. App. 2008)); • breach of oral contract: 3-year limitations period (Md. Code Ann., Cts. & Jud. Proc. § 5-101 (West 2023)); • breach of contract for sale: 4-year limitations period; • open account: 3-year limitations period (Md. Code Ann. Cts. & Jud. Proc. § 5-101 (West 2023)); • account stated: 3-year limitations period (Md. Code Ann., Cts. & Jud. Proc. § 5-101 (West 2023); see *Union Bank of Georgetown v. Planters Bank of Prince George's Cnty.*, 1838 WL 1968 (Md. June 1, 1838)); • unjust enrichment: 3-year limitations period (Md. Code Ann., Cts. & Jud. Proc. § 5-101 (West 2023)); • conversion: 3-year limitations period ((Md. Code Ann., Cts. & Jud. Proc. § 5-101 (West 2023); *Llanten v. Cedar Ridge Counseling Ctrs., LLC*, 75 A.3d 1030, 1034 (Md. Ct. Spec. App. 2013)); and • passing a bad check: 3-years after dishonor of the draft ((although a limitations period of 10

years after the date of the draft applies if the check was not dishonored more than three years earlier (MD Com. Law 3-118 (West 2023)).

### 10 - Prohibit Revival of Time-Barred Claims

Score: 2/2

Does the state prohibit revival of time-barred consumer debt claims, even where defendant makes subsequent payment toward a debt?

Yes

Maryland meets this Benchmark because, once the statute of limitations has run on a consumer debt collection action, Maryland does not permit revival of expired claims even by subsequent payment toward debt, written or oral affirmation of the debt, or any other activity that occurs after the expiration of the statute of limitations. Md. Code Cts. & Jud. Proc. § 5-1202(a)(2022) states: “[a] creditor or a collector may not initiate a consumer debt collection action after the expiration of the statute of limitations applicable to the consumer debt collection action.” Subsection (b) specifies that “[n]otwithstanding any other provision of law, any payment toward, written or oral affirmation of, or any other activity on the debt that occurs after the expiration of the statute of limitations applicable to the consumer debt collection action does not revive or extend the limitations period.”

## V. Issue Area: Prohibit attorneys' fee shifting, and cap interest.

### 11 - Prohibit Attorneys' Fees Shifting

Score: 0/3

Does the state prohibit attorneys' fee shifting in consumer debt lawsuits regardless of contractual provision or reciprocity in fee shifting?

No

Maryland does not meet benchmark 12 because it does not prohibit attorney fee shifting. The statute permits lenders to charge a "reasonable" attorneys' fees from the borrower if stated in the contract. Md. Code Ann., Com. Law § 12-1011 (West).

### 12 - Interest Caps

Score: 0/3

Does the state cap interest in consumer debt lawsuits (regardless of any contractual provision) as follows: a. Pre-judgment interest for debt buyers capped at an annual rate of 7% (or less); and b. Post-judgment interest for all creditors capped at 5% (or less) of the judgment?

No

Maryland does not meet this benchmark because, while it does satisfy the requirement of sub-section (a), it does not satisfy the requirement of sub-section (b). Regarding prejudgment interest, Maryland law states that, except as otherwise provided by law, a person may not charge interest in excess of an effective rate of simple interest of 6% per annum on the unpaid principal balance of a loan. MD. Comm. Law Code Ann. § 12-102 (2021). Thus, Maryland does limit prejudgment interest to 7% or less. Regarding post-judgment interest, Maryland law states that a money judgment entered in an action arising from a contract for the loan of money shall carry interest at the rate charged in the contract on any balance remaining unpaid until the date of maturity of the contract as originally scheduled. Md. Courts and Judicial Proceedings Code Ann. § 11-106 (a) (2021). Thus, Maryland does not limit post-judgment interest to 5% or less of the judgment.

## VI. Issue Area: Reduce the likelihood that consumer debt collection actions leave people homeless, or perpetuate a cycle of debt.

### 13 - Require Court Order to Garnish or Attach

Score: 5/5

Does the state in consumer debt lawsuits require a court order for garnishment and attachment?

Yes

Maryland meets the benchmark because garnishment and attachment require a writ from the clerk following a written request from the judgment creditor. Md. R. Civ. P. 2-641; Md. R. Civ. P. 3-641; Md. R. Civ. P. 2-645.

### 14 - Bank Account Garnishment Exemptions Are Self Executing

Score: 2/2

Does state law require in consumer debt lawsuits that garnishment exemptions for bank accounts are self-executing?

Yes

Maryland meets the benchmark because it provides an exemption for "up to \$500 in a deposit account or other account of the debtor held by a depository institution, without election of the debtor." Md. Code Ann. Cts. & Jud. Proc. § 11-504(b)(5).

### 15 - Essential Exemptions

Score: 0/5

Does the state prevent people from becoming impoverished, unhoused, or unable to work by exempting income and assets from attachment and garnishment, as follows: a. Income of at least \$576.92 per week, the minimum to keep a family of four above the federal poverty level, as defined by the U.S. Federal Poverty Guidelines in 2023; b. Home, regardless of value, or at least the median price of a home in the state; and c. Car value, state exemption for, at least, the first \$15,000 in value?

No

Maryland does not meet this benchmark because none of the sub-benchmarks are met. Maryland law provides as follows: (a) Income: Maryland does not meet sub-benchmark (a) because it exempts 75% of a person's weekly disposable earnings or 30 times the state minimum hourly wage in effect when the person is paid, whichever is more. Md. Code Ann., Com. Law § 15-601.1(b) (West 2023). Thirty times the state minimum wage (in 2024 \$15 per hour) is only \$450. State Minimum Wage Laws, U.S. Dep't of Labor (Jan. 24, 2024), <https://www.dol.gov/agencies/whd/minimum-wage/state>. (b) Home: Maryland does not meet sub-benchmark (b) because there is no exemption for a home. Md. Code Ann., Cts. & Jud. Proc. § 11-504 (West 2023). (c) Car: Maryland does not meet sub-benchmark (c) because it does not offer any exemptions for a person's car(s). Md. Code Ann., Cts. & Jud. Proc. § 11-504(f)(1)(i)(1) (West 2023) (although Maryland offers a wildcard exemption of up to \$5,000 for a person's personal property that may be applied to a person's car(s)). For more information on garnishment exemptions see Michael Best and Carolyn Carter, No Fresh Start 2023, National Consumer Law Center (Dec. 2023), [https://www.nclc.org/wp-content/uploads/2023/12/2023\\_Report\\_No-Fresh-Start-3.pdf](https://www.nclc.org/wp-content/uploads/2023/12/2023_Report_No-Fresh-Start-3.pdf).

### 16 - Require Prior Notice of Garnishment

Score: 0/5

Does the state require notice to debtor prior to actual garnishment that explains all of the following: a. potential exemptions? b. how to challenge the order? and c. how to assert exemptions?

No

Maryland does not meet this benchmark because it does not require prior notice of garnishment exemptions or how to assert them. See Md. Cir. Ct. R. 2-646. Instead, for non-wage garnishment the writ of garnishment is mailed to the judgment debtor's last known address promptly after service of the writ upon the garnishee, see id. at 2-645(d) and for wage garnishment, the writ of garnishment is mailed to the judgment debtor's last known address upon issuance of the writ, without requiring that the notice be served prior to execution. See id. 2-646(d) (wage garnishment). Additionally, even if Maryland required that its notice be provided prior to garnishment, the state would not meet sub-benchmark (a) (potential exemptions) because the required notice to the judgment debtor does not provide a list of exemptions (but only is required to note that federal and state exemptions may be available); sub-benchmark (b) (how to challenge the order) because the notice is not required to describe the manner in which an order may be challenged (but only to inform the judgment debtor that they have the right to contest garnishment by asserting a defense or objection); or sub-benchmark (c) (how to assert exemptions) because the state does not required the notice to describe the manner in which to assert exemptions. See id. at 2-646(b)(3)–(4).

## VII. Issue Area: Eliminate debtors' prison.

### 17 - Prohibit Incarceration for Failure to Obey a Court Order to Pay Consumer Debt

Score: 5/5

Does the state prohibit incarceration for contempt for failure to obey a court order to pay all or part of a consumer debt judgment?

Yes

Maryland meets the benchmark because its prohibits incarceration for failure to obey a court order to pay a debt. Article III, Section 38 of the Maryland Constitution prohibits imprisonment for debt. The Maryland Supreme Court has held that "when the decree only directs the payment of money, a party defendant, who has been brought into court under process of contempt to compel the performance of such a decree, may not be imprisoned." *Brown v. Brown*, 287 Md. 273, 286-87 (Md. 1980). See also *Dickey v. Dickey*, 154 Md. 675, 681 (Md. 1928) ("When the decree only directs the payment of money, a party defendant, who has been brought into court under process of contempt to compel the performance of such a decree, may not be imprisoned.").

### 18 - Prohibit Incarceration for Failure to Obey a Court Order to Appear at a Debtor's Examination, Unless Nonappearance Was Willful

Score: 0/5

Does the state prohibit arrest and/or incarceration for contempt for failure to appear at a debtor's examination (i.e. a judgment enforcement proceeding), unless the person's failure to appear was willful?

No

Maryland does not meet the benchmark because a person's failure to obey a court order to appear need not be willful to constitute contempt. Md. Ann. Code R. 15-502. If a judgment debtor fails to appear for an oral examination in aid of discovery (a debtor's examination), the person may be arrested and brought before the court or held in contempt. Md. Ann. Code R. 3-633. See *Ramsay v. Sawyer Property Mgmt. of Md.*, 948 F.Supp.2d 525 (D. Md. 2013) (explaining the contempt process under Maryland law if a person fails to appear at a debtor's examination).

### 19 - Provide Right to Counsel

Score: 5/5



Does the state provide a lawyer without charge in any contempt or other proceeding in which incarceration is a potential outcome in a consumer debt lawsuit?

Yes

Maryland meets the benchmark because the Maryland rules provide that persons facing contempt proceedings have a right to an attorney when facing incarceration. Md. R. 15-206(e)(2)(A).

## VIII. Issue Area: Prevent government from undue intervention on behalf of creditor.

### 20 - Prohibit Collaboration Between Creditors and Prosecutors

Score: 0/2

Does the state prohibit relationships (including financial relationships) in which prosecutors lend the authority of their offices to facilitate the activities of debt collectors (e.g. payments by creditors to prosecutors who threaten or bring criminal prosecutions in bad check cases)?

No

Maryland does not meet this benchmark because there is no statutory or judicial prohibition on relationships or financial arrangements between prosecutors and debt collectors. See Md. Crim. Law Code Ann. § 8-103.

### 21 - Prohibit Paying Bail/Bond to Creditor

Score: 0/2

Does the state prohibit use of bail to pay the creditor in all contempt proceedings, or in other proceedings in a consumer debt lawsuit in which incarceration is a possible outcome?

No

Maryland does not meet the benchmark because its laws do not include an express prohibition on the use of bail or bond to pay a creditor. See Md. Ann. Code R. 3-633.

### 22 - Limit Frequency of Examinations

Score: 5/5

Does the state in consumer debt litigation schedule or otherwise limit financial examinations to no more than once per year?

Yes

Maryland meets the benchmark because the law provides that, "on request of the judgment creditor, if more than one year has elapsed since the most recent examination of the person, the court shall order a subsequent appearance for examination of the person. If less than one year has elapsed since the most recent examination of the person, the court may require a showing of good cause." Md. R. Civ. P. Dist. Ct. 3-633.

## IX. Issue Area: Collect data to improve the system.

### 23 - Data Collection: Number of Lawsuits

Score: 0/3

Do state courts at least annually collect and publish statewide data on number of consumer debt lawsuits?

No

Maryland does not meet the benchmark because Maryland's state courts do not collect and publish statewide data on the number of consumer debt lawsuits nor the types of dispositions of consumer debt lawsuits. Md. R. Jud. & Judi. Appts. 18-602 mandates that each Circuit and County Administrative submit reports required from time to time by the Chief Judge of the Court of Appeals. The FY 2021 Maryland Judiciary Statistical Abstract categorizes the cases accordingly: civil - general (condemnation, continued confessed judgment, contract, motor tort, other law, other tort); civil - family (adoption/guardianship, divorce/nullity, domestic violence, other domestic relations, paternity); juvenile (adoption, adult, child in need of assistance, child in need of supervision, delinquency, guardianship (TPR), peace orders, unreported category); criminal (indictment/information, jury trial prayed motor and other, non support, and post conviction). Maryland does report some disposition types for some case types, but it does not do so for consumer debt lawsuits. See page 11 of FY 2021 Maryland Judiciary Statistical Abstract, sy <https://online.flippingbook.com/view/30543303/11/>.

## 24 - Data Collection: Disposition of Lawsuits

**Score: 0/2**

Do state courts at least annually collect and publish statewide data on types of dispositions of consumer debt lawsuits?

**No**

Maryland does not meet the benchmark because Maryland's state courts do not collect and publish statewide data on the number of consumer debt lawsuits nor the types of dispositions of consumer debt lawsuits. Md. R. Jud. & Judi. Appts. 18-602 mandates that each Circuit and County Administrative submit reports required from time to time by the Chief Judge of the Court of Appeals. The FY 2021 Maryland Judiciary Statistical Abstract categorizes the cases accordingly: civil - general (condemnation, continued confessed judgment, contract, motor tort, other law, other tort); civil - family (adoption/guardianship, divorce/nullity, domestic violence, other domestic relations, paternity); juvenile (adoption, adult, child in need of assistance, child in need of supervision, delinquency, guardianship (TPR), peace orders, unreported category); criminal (indictment/information, jury trial prayed motor and other, non support, and post conviction). Maryland does report some disposition types for some case types, but it does not do so for consumer debt lawsuits. See page 11 of FY 2021 Maryland Judiciary Statistical Abstract, sy <https://online.flippingbook.com/view/30543303/11/>.

To learn more about the Consumer Debt Litigation Index, including how other states fared, visit <https://ncaj.org/state-rankings/consumer-debt>.

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