

Consumer Debt Litigation Index

Top Recommendations for Reform in Michigan

Michigan's Score: 14/100

Michigan's National Rank: 39th

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 Michigan already requires that a consumer debt action plead the identity of the original creditor, it does not require that the plaintiff plead its basis of standing or include in the complaint an itemization of the amounts sought.

How: Michigan should adopt a law or practice that requires all consumer debt complaints to allege the basis for plaintiff's standing and 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. Michigan, however, does not yet have these key requirements in place.

How: Michigan should adopt a law or practice that requires plaintiffs in 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. Michigan, however, does not have self-executing bank account exemptions, and it has not increased garnishment and attachment exemptions sufficiently.

How: Michigan 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 Michigan were to Implement these Recommendations?

These three recommendations, if adopted by the state, would substantially increase Michigan's score and ranking. For more on how Michigan 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.

Complete Consumer Debt Litigation Index Findings for Michigan

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

Michigan does not meet this benchmark because it does not meet either sub-benchmark 1a or 1b. Specifically, Michigan does not meet sub-benchmark 1a because process in civil actions may be served by any legally competent adult who is not a party or an officer of a corporate party. Michigan does not meet sub-benchmark 1b because Michigan 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

Michigan does not meet this benchmark because Michigan does not require that notice in a consumer debt lawsuit provide guidance to defendants on where to find help. See Mich. Ct. R. 2.102.

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

Michigan meets this benchmark because it provides an Answer form that can be used by a consumer debt defendant. See <https://www.courts.michigan.gov/4ae489/siteassets/forms/scao-approved/mc03.pdf>.

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

Michigan meets this benchmark because it does not require that a pleading be verified except when specifically required by rule or statute. See Michigan Court Rules 1.100(D)(3). 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

Michigan meets the benchmark because there is no filing fee required to submit an answer to a civil complaint. See INSTRUCTIONS FOR FILING AND SERVING AN ANSWER TO A COMPLAINT (FORM MC 03), Michigan Courts (last visited April 4, 2023) ("There is no filing fee for filing an answer."). <https://www.courts.michigan.gov/siteassets/forms/scao-approved/instmc03.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

Michigan does not meet the benchmark because, although it has special pleading rules requiring that consumer debt complaints plead the name of the original creditor as required by sub-benchmark (a), as well as the account number and the balance due, see Mich. Ct. R. 2.112(N), those rules do not require a consumer debt complaint to include the basis of the plaintiff's standing as required by sub-benchmark (b), or an itemization of the amount sought as required by sub-benchmark (c).

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

Michigan does not meet the benchmark or any sub-benchmarks. Michigan courts may grant default judgments pursuant to Michigan Court Rules § 2.603, which does not impose any of the requirements in sub-benchmarks (a) through (c). There is also no Michigan statute that separately imposes requirements regarding the entry of default judgments.

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

Michigan does not meet the benchmark because there is no requirement for a consumer debt complaint to include (a) the applicable statute of limitations, (b) the date the claim accrued, or (c) the date the statute of limitations expired. See Mich. Ct. R. 2.111(F)(3)(a) (listing statute of limitations as an affirmative defense).

9 - Four Year Statute of Limitations

Score: 0/5

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?

No

Michigan does not meet this Benchmark because it does not impose a 4-year (or shorter) statute of limitations for all consumer debt claims. In particular, Michigan has the following limitations periods: • breach of written contract: 6-year limitations period (Mich. Comp. Laws § 600.5807(9) (2018)); • breach of oral contract: 6-year limitations period (Mich. Comp. Laws § 600.5807(9) (2018)); • open account: 6-year limitations period (Mich. Comp. Laws § 600.5807(9) (2018), see *Fisher Sand and Gravel Co. v. Neal A. Sweebe, Inc.*, 494 Mich. 543, 570-71 (July 30, 2013) ("we conclude that open account claims are subject to the six-year period of limitations governing general contract actions"); • account stated: 6-year limitations period (see *Fisher Sand and Gravel Co. v. Neal A. Sweebe, Inc.*, above) ("We conclude that both open account claims and actions on account stated are subject to the six-year period of limitations"); • unjust enrichment: 6-year limitations period (see *Leavine v. Gembarski*, No. 336094, 2018 WL 1020685, at *3 (Mich. Ct. App. Feb. 22, 2018) ("The statute of limitations for filing an unjust enrichment claim is therefore the same six-year period as that prescribed for a breach of contract claim."); and • conversion: 3-year limitations period (Mich. Comp. Laws § 600.5805(2) (2018), see also *Tillman v. Great Lakes Truck Center, Inc.*, 277 Mich.App. 47 (Oct. 18, 2007) (noting that conversion is an action for injury to property governed by the three-year statute).

10 - Prohibit Revival of Time-Barred Claims

Score: 0/2

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

No

Michigan does not meet this Benchmark because it makes consumer debt claims subject to revival even after the statute of limitations has run, when, for instance, a debtor makes a subsequent payment toward the debt, explicitly acknowledges the debt, or expresses a new promise to pay the debt. See *Yeiter v. Knights of St. Casimir Aid Society*, 461 Mich. 493, 497 and n. 6, 607 N.W.2d 68, 71 (2000) ("a partial payment restarts the running of the limitation period unless it is accompanied by a declaration or circumstance that rebuts the implication that the debtor by partial payment admits the full obligation" and further noting "Part payment even after the bar of the statute of limitations is complete revives the balance of the debt.").

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

Michigan does not meet the benchmark because its courts allow for attorney's fee shifting where a statute or court rule specifically authorizes such. Further, parties to an agreement may include a provision respecting the payment of attorney fees within the agreement, which courts will enforce unless contrary to public policy. *Pransky v. Falcon Grp., Inc.*, 311 Mich. App. 164, 194, 874 N.W.2d 367, 383 (2015). The case law and code are silent with respect to reciprocal rights.

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

Michigan does not meet this benchmark because it does not satisfy the requirements of sub-benchmarks (a) or (b). Regarding prejudgment interest, Michigan law states: "Except as otherwise provided in subsections (5) and (7) and subject to subsection (13), for complaints filed on or after January 1, 1987, interest on a money judgment recovered in a civil action is calculated at 6-month intervals from the date of filing the complaint at a rate of interest equal to 1% plus the average interest rate paid at auctions of 5-year United States treasury notes during the 6 months immediately preceding July 1 and January 1, as certified by the state treasurer, and compounded annually, according to this section. Interest under this subsection is calculated on the entire amount of the money judgment, including attorney fees and other costs. In an action for medical malpractice, interest under this subsection on costs or attorney fees awarded under a statute or court rule is not calculated for any period before the entry of the judgment. The amount of interest attributable to that part of the money judgment from which attorney fees are paid is retained by the plaintiff, and not paid to the plaintiff's attorney." Mich. Comp. Laws § 600.6013(8). As there is no other provision specific to prejudgment interest for debt buyers, there is no guarantee that the annual rate of prejudgment interest for all creditors is less than 7% under Michigan law. Thus, Michigan does not meet sub-benchmark (a). Regarding post-judgment interest, Michigan law states: "For a complaint filed on or after July 1, 2002, if a judgment is rendered on a written instrument evidencing indebtedness with a specified interest rate, interest is calculated from the date of filing the complaint to the date of satisfaction of the judgment at the rate specified in the instrument if the rate was legal at the time the instrument was executed. If the rate in the written instrument is a variable rate, interest shall be fixed at the rate in effect under the instrument at the time the complaint is filed. The rate under this subsection shall not exceed 13% per year compounded annually." Mich. Comp. Laws § 600.6013(7). Given that Michigan law caps the post-judgment

interest rate at 13%, Michigan does not meet the benchmark of a 5% cap on post-judgment interest. Thus, Michigan law does not meet this benchmark.

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

Michigan meets the benchmark because a court must first review and issue a writ before garnishment or attachment occurs. Mich. Ct. R. 3.101; Mich. Ct. R. 3.103. Judgments in small claims are prescribed by the supreme court and post-judgment writs of garnishment are prescribed in the same way in small claims court as in state courts. Mich. Comp. Laws Ann. § 600.8409.

14 - Bank Account Garnishment Exemptions Are Self Executing

Score: 0/2

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

No

Michigan does not meet the benchmark because in most cases it does not require financial institutions to protect money deposited in bank accounts unless a judgment debtor asserts an exemption. Michigan law provides that "a bank or other financial institution, as garnishee, shall not withhold exempt funds of the debtor from an account into which only exempt funds are directly deposited and where such funds are clearly identifiable upon deposit as exempt Social Security benefits, Supplemental Security Income benefits, Railroad Retirement benefits, Black Lung benefits, or Veterans Assistance benefits." Mich. Comp. Laws Ann. § 3.101. This requirement, however, does not apply if there are funds other than those enumerated in the bank account. Further, other exemptions are not self-executing.

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

Michigan does not meet the benchmark because none of the sub-benchmarks are met. Michigan law provides as follows: (a) Income: Michigan does not meet sub-benchmark (a) because it exempts 75% of a person's weekly disposable earnings or 30 times the federal minimum hourly wage in effect when the person is paid, whichever is more. Mich. Comp. Laws Serv. § 408.476; 15 U.S.C. § 1673. Thirty times the federal minimum wage (\$7.25 per hour in 2023) is only \$217.50. State Minimum Wage Laws, U.S. Dep't of Labor (Sept. 30, 2023), <https://www.dol.gov/agencies/whd/minimum-wage/state>. (b) Home: Michigan does not meet sub-benchmark (b) because a home, including its land of not more than 40 acres, is exempt only up to a value of \$3,500 subject to certain limited exceptions. Mich. Comp. Laws Serv. § 600.6023(g). (c) Car: Michigan does not meet sub-

benchmark (c) because a car that is necessary to a person's business is exempt only up to a value of \$1,000. Mich. Comp. Laws Serv. § 600.6023(e). 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.

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

Michigan does not meet this benchmark because it does not require that the judgment debtor be given notice of exemptions and how to assert them prior to garnishment. Instead the garnishee must deliver a copy of the writ of garnishment to the judgment debtor within seven days of being served with the writ. See Mich. Ct. R. 3.101(F)(2). Additionally, even if Michigan did require prior notice, it would not meet sub-benchmark (a) (potential exemptions) because notice to the judgment debtor is not required to list potential exemptions; sub-benchmark (b) (how to challenge the order), because the notice is not required to explain how to challenge the order; or sub-benchmark (c) (how to assert exemptions), because the notice is not required to explain how to assert exemptions. Id.

VII. Issue Area: Eliminate debtors' prison.

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

Score: 0/5

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

No

Michigan does not meet the benchmark because its contempt statute specifically provides that a judge may hold a person in contempt for "the nonpayment of any sum of money which the court has ordered to be paid." Mich. Comp. Laws Ann. § 600.1701. Contempt is punishable by fine or imprisonment. Mich. Comp. Laws Ann. § 600.1711.

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

Michigan does not meet the benchmark because a person's failure to appear need not be willful to constitute contempt. The contempt statute provides that a judge may hold a person in contempt "for disobeying any lawful order, decree, or process of the court." Mich. Comp. Laws Ann. § 600.1701. In addition, the law provides that after a money judgment has been entered, a judge may "make any order as within his discretion seems appropriate in regard to carrying out the full intent and purpose of these provisions to subject any nonexempt assets of any judgment debtor to the satisfaction of any judgment against the judgment debtor." Mich. Comp. Laws Ann. § 600.6104. Contempt is punishable by fine or imprisonment. Mich. Comp. Laws Ann. § 600.1711.

19 - Provide Right to Counsel**Score: 0/5**

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?

No

Michigan does not meet this benchmark because it does not provide a right to counsel in all contempt cases in which incarceration is possible. See Mich. Comp. Laws Ann. §§ 780.983(f)(i), 600.1711(2) (West 2023).

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

Michigan does not meet this benchmark because there is no statutory or judicial prohibition on such relationships or financial arrangements between prosecutors and debt collectors. See Mich. Comp. Laws Ann. § 750.131.

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

Michigan does not meet the benchmark because it explicitly permits the use of bail to pay a creditor. Mich. Comp. Laws Ann. § 600.6081.

22 - Limit Frequency of Examinations**Score: 0/5**

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

No

Michigan does not meet the benchmark because the law provides that "upon an affidavit, showing to the satisfaction of the judge that any person has money or property of the judgment debtor, or is indebted to him, the judge may issue a subpoena requiring the judgment debtor or the person or both to appear at a specified time and place, and be examined on oath, and to produce for examination any books, papers, or records in his or its possession or control which have or may contain information concerning the property or income of the debtor." The statute does not limit the frequency of such examinations. Mich. Comp. Laws § 600.6110

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

Michigan does not meet the benchmark because Michigan does not collect and publish statewide data on consumer debt lawsuits and the dispositions of consumer debt lawsuits. While the Michigan State Court Administrator must collect and compile statistical data, make reports of the business transacted by the courts and transmit the reports to the Supreme Court, the Administrator does not have to, nor does it, collect any specific data in respect of consumer debt collection or otherwise. MI Rules MCR 8.103 (2022). Note: The MI Justice for All Commission published a report in November 2022 titled "Advancing Justice for All in Debt Collection Lawsuits" about what Michigan can do to improve its handling of consumer debt collection cases. The report suggests that giving consumer debt collection cases a unique case code in the data would improve the identification of consumer debt collection cases moving forward and allow Michigan and its district courts to understand the full extent to which these cases fill their dockets. See Michigan Justice for All Commission, ADVANCING JUSTICE FOR ALL IN DEBT COLLECTION LAWSUITS. See https://www.courts.michigan.gov/4ac33d/siteassets/reports/special-initiatives/justice-for-all/jfa_advancing_justice_for_all_in_debt_collection_lawsuits.pdf.

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

Michigan does not meet the benchmark because Michigan does not collect and publish statewide data on consumer debt lawsuits and the dispositions of consumer debt lawsuits. While the Michigan State Court Administrator must collect and compile statistical data, make reports of the business transacted by the courts and transmit the reports to the Supreme Court, the Administrator does not have to, nor does it, collect any specific data in respect of consumer debt collection or otherwise. MI Rules MCR 8.103 (2022). Note: The MI Justice for All Commission published a report in November 2022 titled "Advancing Justice for All in Debt Collection Lawsuits" about what Michigan can do to improve its handling of consumer debt collection cases. The report suggests that giving consumer debt collection cases a unique case code in the data would improve the identification of consumer debt collection cases moving forward and allow Michigan and its district courts to understand the full extent to which these cases fill their dockets. See Michigan Justice for All Commission, ADVANCING JUSTICE FOR ALL IN DEBT COLLECTION LAWSUITS. See https://www.courts.michigan.gov/4ac33d/siteassets/reports/special-initiatives/justice-for-all/jfa_advancing_justice_for_all_in_debt_collection_lawsuits.pdf.

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