CONSUMER HARM INTELLIGENCE FOR FINANCIAL INSTITUTIONS

McCarthy Hatch

Built to understand, not count.

AI early-warning for consumer harm. FSAi reads complaints in people's own words and shows institutions the harm before it becomes a fine or a lawsuit.

WHO WE ARE

We built the agency. Now we're building the tool.

Jim McCarthy was a founding member of the **Consumer Financial Protection Bureau** and built the **complaint portal.**

JIM McCARTHY

Founder & Chairman

Founding member, CFPB. Built the federal complaint system.

ASAF BUCHNER, CFA

Chief Executive Officer

Schwab · UBS · KPMG · EY-Parthenon · Consumer Protection Advisory Board.

COL. PAUL KANTWILL (RET.)

Senior Advisor

Dir., CFPB Servicemember Affairs · U.S. Army JAG Corps.

Architects of the system. Operators of the company.

WHAT WE DO

FSAi helps banks and financial institutions detect emerging consumer harm, control failures, and regulatory exposure from complaint narratives before they become enforcement, litigation, or remediation events.

THE PROBLEM

One complaint is one human story.

A woman in Pennsylvania: **$12,000** in unemployment benefits — gone — on a card she never received. She files a complaint, in her own words.

Every institution is required to receive these, answer them, and hand them to the examiner. Multiply her by millions — and somewhere in the words is the next enforcement action.

Compliance teams receive the signal — but current systems fragment it before leaders can act.

WHY IT GOES UNSEEN

For fifteen years, the industry counted. Nobody read.

WHAT THE INDUSTRY DOES

Counts the category.

A drop-down the consumer picks before typing a word: product, sub-product, issue, state. Often wrong.

WHAT FSAi DOES

Reads the words.

Reconstructs the real product and the operational failure behind it — from what the consumer actually said.

Misclassification is not an edge case; it is a structural weakness in complaint oversight.

THE SOLUTION

Read. Reconstruct. Surface.

FSAi analyzes each complaint the moment it arrives — written or verbal — before anything else touches it.

01

READ

Every narrative, in the consumer's own words — the first and truest signal.

→

02

RECONSTRUCT

The real product and the operational failure behind the label it was filed under.

→

03

SURFACE

The cluster, ranked by consumer harm and regulatory exposure — as early warning.

DEPLOYMENT: cloud SaaS · sits on the institution's complaint intake · trained on the full public CFPB record + the institution's own data.

PRODUCT

What FSAi surfaces

One reconstructed harm record — the output a compliance team acts on.

HARM RECORD · CFPB COMPLAINT 4137240

SEVERITY · HIGH

HARM CLUSTER

Unauthorized transfers on state benefit cards

RECONSTRUCTED PRODUCT

Gov't prepaid benefit card — mislabeled as four products

OPERATIONAL FAILURE

Reg E error-resolution & provisional-credit breakdown

SEVERITY / REGULATORY EXPOSURE

High — EFTA/Reg E & UDAAP — enforcement + remediation risk

REPRESENTATIVE NARRATIVES

"$12,000 gone from a card I never received." +43 linked

RECOMMENDED INVESTIGATION PATH

→ Pull every benefit-card complaint across the four mislabeled products

→ Test provisional-credit timing against the Reg E clock

→ Assemble the examiner-ready evidence pack

WHAT COUNTING COSTS

A missed pattern became a $36M order.

Public CFPB record (Complaint 4137240): the same harm came in as checking, savings, prepaid, and debit — but it was one product, a state unemployment card. Fragmented teams counted four categories and never saw the shape.

$36M enforcement order **1,041** days to surface

Back-test — FSAi connected the pattern across product categories earlier than conventional complaint counts.

MARKET SIZE

A big problem with a big market.

TAM	TAM — all U.S. institutions with a complaint obligation ~4,400 banks · ~4,600 credit unions · + nonbank firms ≈ 9,000	**$1.8B**
SAM	SAM — enterprise-ready, complaint-supervised institutions 180+ CFPB-supervised banks (>$10B) · nonbank larger participants ≈ 600	**$120M**
SOM	SOM — five-year beachhead at ~$200K / institution / yr ~125 accounts × $200K — our 5-year target	**$25M**

Bottom-up, not top-down. ~9,000 institutions × ~$200K ≈ $1.8B TAM; our SOM is ~1.4% of it.

BUSINESS MODEL

Banks pay ~$200K to get ahead of an eight-figure order.

Annual SaaS subscription. The value is asymmetric — the price is a rounding error against the fine, the lawsuit, and the remediation it prevents.

~$200K

Annual SaaS + implementation. Tiered by assets, products, complaint volume & modules.

RISK ID

We surface the risk and point to the operational failure. The institution owns the fix.

RETENTION

Embedded in the compliance workflow — sticky by design.

ENTRY: paid diagnostic / scoped POC → annual subscription → expansion

Risk identification — directional and decision-useful. We tell you where to look; you own remediation.

COMPETITION

Others manage complaints. We understand them.

● capability ○ absent / not at scale

	Reads every narrative	Reconstructs the harm	Regulatory ontology	Early-warning clusters	Examiner-ready evidence
FSAi · McCarthy Hatch	●	●	●	●	●
Complaint-management systems	○	○	○	○	○
CX / sentiment platforms	●	○	○	○	○
Manual compliance review	○	●	●	○	●
Internal analytics teams	●	○	○	●	○

Others manage or measure. We reconstruct the harm — and warn before it clusters.

WHY NOW

Institutions want to get ahead.

EXPANDING VOLUME

Complaint volume and channels keep expanding — more narratives, more surface area for harm.

MANUAL CAN'T SCALE

Manual review cannot read every narrative; sampling misses the pattern until it is an event.

PROACTIVE RISK

Banks need proactive consumer-risk intelligence as supervision shifts and litigation risk persists.

The business stands on institutional demand. Regulator adoption is a tailwind, not the dependency.

TRACTION

Live product. Paying customers. Enterprise validation.

$190K

BOOKED REVENUE

Top-5

U.S. BANK CUSTOMER

PAYING CUSTOMERS

A top-5 U.S. bank

Consumer-protection law firm

Paid engagements across two segments — enterprise validation, not a pilot. Qualified pipeline in active discussion.

DATASET COVERAGE

609,160 complaint signals · 3,708 institutions · 50 states — dataset coverage, not customer count.

→ →

GO-TO-MARKET

Enterprise sales motion

How we turn bank validation into repeatable enterprise revenue.

BUYER

Chief Compliance Officer · Head of Complaints

BEACHHEAD

Banks · Credit Unions · Nonbank Lenders

01

ENTRY

Paid diagnostic / scoped POC

02

CONVERSION

Annual SaaS subscription

03

EXPANSION

More products & business lines

REVTECH VALUE

Bank introductions · POC design · procurement navigation

FUNDING / USE OF FUNDS

Raising $500K to convert validation into repeatable enterprise revenue.

The product is live with paying customers. This round funds the motion that makes revenue repeatable.

THE ROUND · USE OF FUNDS

Raising $500K

Committed / indicated: $250K

Enterprise sales

Solutions engineering

Customer success

Data ingestion & integrations

18-MONTH MILESTONES

→ $1 million ARR

→ Signed enterprise customers

→ Paid pilots in flight

→ Repeatable deployment playbook

REVTECH FIT

Why RevTech Labs

We’re applying to RevTech to turn bank validation into a repeatable enterprise sales motion.

THREE 12-WEEK OBJECTIVES

01

Secure 5–8 qualified bank / credit union introductions.

02

Convert at least one paid POC or design partner.

03

Refine pricing, procurement & implementation playbook for seed-stage scale.

12 weeks. From validated to repeatable.

THE CHANGE WE CREATE

Harm understood early protects consumers and companies alike.

Built to understand, not count.

Help us make consumer harm visible before it becomes a headline, lawsuit, or enforcement order.

Asaf Buchner · asaf@mccarthy-hatch.com · 212-213-3791