

**Rebecca E. Kuehn**

Hudson Cook, LLP  
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***Work Experience***

**Hudson Cook, LLP**, Washington,  
D.C. Partner, April 2015 to Present

Practice focuses on consumer financial services and consumer protection matters. Counsels financial institutions, consumer reporting agencies, service providers, and others in complying with consumer financial laws and prohibitions against unfair, deceptive, or abusive trade practices. Represents clients before federal and state agencies and the courts, particularly the Federal Trade Commission and Consumer Financial Protection Bureau, in investigations and other proceedings.

**CoreLogic**, McLean, VA  
Vice President and Senior Regulatory Counsel, September 2011 to April 2015

Served as lead lawyer and coverage counsel for the CoreLogic credit reporting and consumer data businesses, providing advice and guidance to management on a variety of consumer data and privacy-related regulatory issues, including the Fair Credit Reporting Act (FCRA) and the Gramm-Leach-Bliley Act.

**Federal Trade Commission**, Bureau of Consumer Protection, Washington, D.C.  
Assistant Director, Division of Privacy and Identity Protection, May 2006 to September 2011

Supervised attorneys and other staff on investigations and policy work related to credit reporting, consumer privacy, identity theft, and information security. Primarily responsible for the Fair Credit Reporting Act program, leading the Commission's enforcement, policy, outreach, and rulemaking activities in that area. Regularly coordinated with the federal financial agencies in the development, issuance, and interpretation of interagency rules, including the Affiliate Marketing Rule, the Risk Based Pricing Rule, the Accuracy and Direct Dispute Rules, and the amendments to Gramm- Leach-Bliley Privacy Rule.

Responsibilities included analyzing and providing comment on legislative proposals to senior Commission staff and Congressional staff, coordinating legal interpretations and policy across intra- and interagency boundaries, and serving as a subject matter expert and resource to Commission staff and industry. Provided technical assistance to Egypt on oversight and regulation of credit bureaus as part of USAID mission. Served on the World Bank Credit Reporting Task Force, providing significant contributions to the development of a consultative draft report entitled General Principles for Credit Reporting.

**LeClair Ryan**, Alexandria,  
VA Partner, January 2002 to  
May 2006  
Associate, February 2000 to December 2001

Developed litigation and counseling practice concentrated on the representation of financial service providers and consumer reporting agencies, including claims brought under state law, the Fair Credit Reporting Act, the Truth in Lending Act, and the Fair Debt Collection Practices Act. Significant first-chair trial experience. Responsible for the supervision of junior attorneys and the management of case assignments for office.

**Reed Smith Hazel & Thomas LLP**, Falls Church, VA  
Associate, January 1997 to February 2000

Primarily responsible for a variety of civil litigation matters, including commercial matters, software and other technology-related disputes, lender liability, medical malpractice defense, and products liability actions.

**Spriggs & Hollingsworth**,  
Washington, D.C. Associate,  
September 1994 to January 1997

Litigation practice, primarily focused on commercial matters, multi-party toxic tort actions, and insurance coverage disputes.

### ***Bar Contributions***

Co-Chair, American Bar Association, Section of Litigation, Consumer Financial Litigation Committee, FCRA Subcommittee, 2019 to Present.

Chair, 2016 National Institute for Consumer Financial Services Basics,

American Bar Association, Section of Business, Consumer Financial Services Committee

Contributor, CFPB Biweekly Updates, American Bar Association, Section of Antitrust, Consumer Protection Committee, 2015 to 2019.

Faculty, National Institute for Consumer Financial Services Basics, 2013, 2014, 2015, 2016, 2017, 2018, 2019

Observer, Criminal Records Accuracy Committee, Uniform Law Commission, 2015 – Present

Member, American Bar Association, Section of Litigation, Woman Advocate Committee

### ***Education***

#### **The George Washington University, National Law Center, Washington, D.C.**

Juris Doctor with High Honors, May

1994 Class Rank: Top 5%

Member, The Order of the Coif

Member, *The George Washington Law Review*

Anne Wells Branscomb Award for Graduating Student with Highest Average in Part-Time Course of Study

#### **Frostburg State University, Frostburg, MD**

Bachelor of Arts, Magna Cum Laude, December

1988 English Major with Business Minor

Commencement Speaker for Graduating Class

### ***Bar Admissions***

Admitted to practice in Maryland, Virginia, and the District of Columbia

### ***Selected Presentations***

*Regulatory Update on the Fair Credit Reporting Act*, Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, November 2024

*CFPB Rules: Navigating Proposed and Final Regulations*, NAF Compliance Workshop, October 2024

*Tortured Rules Department: The latest on the CFPB's FCRA rule, PBSA Annual Conference, September 2024*

*Steering Clear of Compliance Pitfalls, Nova Cashflow Underwriting Summit, September 2024*

*The CFPB's FCRA Rulemaking, What It May Mean, and Whether It Will Survive, CCFL Annual Consumer Financial Services Conference, May 2024.*

*CFPB Issues Two New FCRA Advisory Opinions – A CDIA Webinar, February 2024*

*CDIA Webinar on FTC Amendment to Safeguards Rule, November 2023*

*Breaking Down the CFPB's New Rulemaking, Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, October 2023*

*What's Happening in Washington, Experian Vision Conference, May 2023*

*Compliant Originations and Customer Management: Regulatory Speed Dating for Business Leaders, FICO World, May 2023*

*The Post-Pandemic Consumer Financial Protection Landscape, ABA Antitrust Section Consumer Protection & Data Privacy Conference, February 2023*

*Driving Change: Litigation & Enforcement Developments in the Consumer Reporting Industry, CDIA Virtual Law & Industry Conference, June 2022*

*Removing Bias in Lending for a More Equitable Financial System, LendIt Fintech USA 2022, May 2022*

*Getting a Clearer Picture or Merely a Caricature? The Use of Alternative Data and Artificial Intelligence in Credit Decisions, Servicing and Collection, CCFL Annual Consumer Financial Services Conference, May 2022*

*Fair Lending Tune-Up, FICO World 2022, May 2022*

*Tracking New Debt Collection Regulations and Policy: Opportunities in Loss Prevention, FICO World 2022, May 2022*

*Tenant and Employment Screening Under the FCRA, PBSA Webinar, April 2022*

*Big Changes in Reporting Medical Collections Debt: A CDIA Webinar exploring what happened, what's next and why it matters, CDIA Webinar, April 2022*

*From the Hill: the regulatory landscape in motion, Experian Vision 2022, April 2022*

*The War on Tenant Screening: How Regulatory and Legislative Changes in Washington Are Impacting the Industry*, PBSA 2022 Mid-Year Legislative and Regulatory Conference, April 2022

*Fast and Furious with the FCRA: Fifty Minutes on the Latest Developments in FCRA Litigation*, ABA Litigation Section, Consumer Litigation Committee, The Woman Advocate Committee Webinar, April 2022

*The CFPB's View of Credit Reporting*, CDIA Webinar, March 2022

*A Holistic View of Red Flags*, Hudson Cook Compliance Coffee Break, March 2022

*Mingling with Membership: Data Privacy and Security: Lessons Learned from FTC Developments*, North Carolina Bar Association Webinar, February 2022

*FTC Expands Safeguards Rule to Address Cybersecurity Risks & Privacy*, CDIA Webinar, December 2021

*Regulatory Changes Pave the Way for a New Era of Consumer Protection*, CDIA Webinar, November 2021

*What to Expect in Supervisory Examinations in the Biden Administration*, INFiN MoneyTrends, November 2021

*Stretching Your Outside Counsel Dollar: Strategies for Maximizing Your Legal Budget*, Professional Background Screening Association Annual Conference, September 2021

*Rise of the Machines: Using AI and Other Data Analytics to Improve Compliance and Deliver Better Products*, Professional Background Screening Association Annual Conference, September 2021

*Litigation & Enforcement Trends: What will we see in 2021*, CDIA 2021 Virtual Law & Industry Conference, July 2021

*Consumer Protection Gotchas for Lenders and MSBs: Privacy, Safeguards, Red Flags and the ADA*, INFiN Webinar, July 2021

*Supreme Court Decision: TransUnion v. Ramirez*, CDIA Webinar, June 2021

*Employment/Income/Asset Verification: New Trends in Underwriting*, 2021 Virtual Financial Services Conference, May 2021

*VCDPA - The newest consumer data privacy law comes to Virginia*, Hudson Cook Compliance Coffee Break, April 2021

*Compliance Priorities for Tenant Screeners to Reduce Regulatory and Litigation Risk*, Professional Background Screening Association Virtual 2021 Mid-Year Legislative & Regulatory Conference, April 2021

*FCRA Litigation: A Review of Top Issues from 2020 and What to Expect in 2021*, ABA Consumer Litigation Committee Virtual Roundtable, February 2021

*The Changing Dynamics of Litigation & Enforcement*, CDIA Webinar Rebroadcast, December 2020

*FCRA Basics for Screeners - Distance Learning Style*, Professional Background Screening Association Virtual Conference, September 2020

*FTC to Ramp Up the GLBA Safeguards Rule*, CDIA Webinar, August 2020

*CFPB Director Kraninger to Address Credit Reporting Industry - A CDIA Teleseminar with comments on the impact of the CARES Act on the compliance ecosystem*, CDIA Webinar, June 2020

*Fair Lending Fundamentals in Today's Information-based World*, NAFCU Webinar, May 2020

*Consumer Protection Considerations for Small Dollar Lenders During Covid-19*, Hudson Cook webinar, April 2020

*COVID-19 in the Screening Industry Q&A Part I*, Professional Background Screening Association Webinar, April 2020

*The CARES Act: Modifications to Data Furnishers' FCRA Obligations*, CDIA Webinar, April 2020

*Conducting Internal Investigations Post-Connolly*, ABA 2020 Corporate Counsel CLE Seminar, February 2020

*CDIA Briefing on CFPB/FTC Workshop on Accuracy in Credit Reporting*, CDIA Webinar, December 2019

*Data Management for Business Operations, and Compliance Speedsmarts: Technology*, AFSA Annual Meeting, October 2019

*Navigating the Challenges in Today's Litigation and Enforcement Environment*, CDIA webinar, October 2019

*Lessons for Tenant Screeners from the Front Lines, and Ask the Lawyers*, Professional Background Screening Association, September 2019

*Getting Prepared for Data Privacy in Debt Collections, and Data Privacy meet Regulatory Oversight in Debt Collection*, Automotive Intelligence Summit, July 2019

*Examining the Hottest Claims of 2019 Under the FCRA and ECOA, ACI Consumer Finance: Class Actions, Litigation & Government Enforcement Actions*, July 2019

*Managing Risk in an Always-Changing Litigation & Enforcement Environment*, CDIA Law & Industry Conference, June 2019

*A New Way to (Really) Know Your Customers: Consumer-Permissioned Access to Financial Accounts, and Privacy in the New World: Post-GDPR State Law Privacy Developments in the United States*, Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019

*Trends in Fraud, and How to Avoid It*, CBA Live 2019, April 2019

*Privacy in the New World: Post-GDPR State Law Privacy Developments*, FiSCA Annual Conference & Expo, October 2018

*You've Got Questions – They've Got Answers, and Island of Misfit Toys: How Does the FCRA Apply to FINRA Onboarding, and Other 'Not Quite Employment' Circumstances (If at All)?*, National Association of Professional Background Screeners Annual Conference, October 2018

*State and Local Law Developments in Residential Screening*, National Consumer Reporting Association Conference, November 2017

*A Conversation with the Federal Trade Commission, and Don't Let Your Audit Reports Become "Exhibit A" in Court: The Do's and Don'ts of Conducting Audits to Manage Compliance and Litigation Risk*, National Association of Professional Background Screeners Annual Conference, September 2017

*Tenant Screening Basics*, National Association of Professional Background Screeners Annual Conference, September 2016

*Class Actions After Spokeo, Inc. v. Robins*, ABA Section of Business Law Annual Meeting, September 2016

*Privacy Law Developments – Emerging Data Trends, Privacy Law Developments – Employment, Privacy Law Update*, Counselor Library Conference 2016, April 2016

*The Automobile as the Ultimate Mobility Device – Autonomous, Connected, Electric Shared*, FICO World 2016 Conference, April 2016

*Simplified Compliance Management for Screening Companies*, National Association of Professional Background Screeners Annual Conference, September 2015

*Fair Credit Reporting Act: Litigation, Regulatory and Enforcement Developments in the Financial Services Industry and Beyond*, Stafford Conferences Webinar, June 2015

*Big Data and Global Privacy*, FICO World Conference, November 2014

*Fair Credit Reporting Act and Financial Privacy*, ABA National Institute on Consumer Financial Law Basics, October 2014

*Alternative Credit Data*, Credit Builders Alliance Credit Building Symposium, July 2014

*CFPB and Furnisher FCRA Obligations*, ABA Consumer Financial Services Committee Winter Meeting, January 2014

*Background Screening: Is FCRA Compliance Enough or Does the FTC Want More?*, International Association of Privacy Professionals, December 2013

*Top 10 Compliance Challenges for CRAs*, National Association of Professional Background Screeners Annual Conference, September 2013

*International Credit Reporting and Alternative Data*, NCLC/Suffolk Law School, Credit Reporting and Credit Scoring Symposium, June 2012

*Update by the Federal Trade Commission*, 2011 National Association of Professional Background Screeners Annual Conference, March 22, 2011

*Update on the FTC*, 2010 National Credit Reporting Association Annual Conference, November 11, 2010

*Federal FCRA and FTC Enforcement Initiatives*, 24<sup>th</sup> Annual Payment Card Institute, May 6-7, 2010

*The Inside Straight on the Changing Government Role in the Economy*, ACA International's 70<sup>th</sup> Annual Convention, July 14, 2009

*Implementation of the Affiliate Sharing Rule and Red Flags Rule*, American Bar Association Consumer Financial Services Committee, 2008 Winter Meeting, January 11, 2009

*The FCRA: It's Not Just for Credit Bureaus*, IAPP Privacy Academy, Sept. 23, 2008

*Identity Theft and Privacy Rules*, 2008 NACCA Examiner's School, May 8, 2008



*Security Freezes and the Impact on the Credit Reporting System, Fair Isaac's 2007 InterACT Conference, San Francisco, CA, May 15, 2007*

*Data Security and Recommendations of the President's Identity Theft Task Force, Collection and Recovery Solutions 2007 Conference, Las Vegas, NV, May 3, 2007*

*Recent Developments in Data Security, American Financial Services Association, Law Committee Meeting, January 29, 2007*

*Current Topics in Credit Reporting and Credit Scoring, American Financial Services Association, 8<sup>th</sup> Annual State Government Affairs Forum, September 28, 2006*