

Rebecca E. Kuehn



Professional Profile

Experienced consumer financial services attorney with significant privacy expertise.

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

Faculty, National Institute for Consumer Financial Services Basics

Observer, Criminal Records Accuracy Committee, Uniform Law Commission

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

The Future of Fair Lending: Federal Rollbacks and State Responses, ABA Consumer Financial Services Committee Winter Meeting, January 2026

Navigating the Minefield: What Credit Report Users and Furnishers Need to Know Now, Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, November 2025

The New Regulatory Frontier: how the future of credit reporting will be impacted by regulation of AI & data, World Consumer Credit Reporting Conference, October 2025

Behind the Screens: Securing Data in the Background Screening Industry, PBSA Annual Conference, October 2025

"Are You Ready for It?": A Swift Start to Tenant Screening Compliance, PBSA Annual Conference, October 2025

Trigger Warnings: Mortgage Triggers and Resellers, NCRA Webinar, July 2025

Recent Developments in the FCRA, CCFL Annual Consumer Finance Law Conference, May 2025

Consumer Reporting Litigation & Enforcement: Key Risks & Trends in 2025, CDIA Connect, May 2025

The Evolution of Consumer Data: A Woman's Perspective, CDIA Connect, May 2025

New Year, New Rules? Fraud Products and the FCRA, Auto Intel Summit, April 2025

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

Credit Reporting, ABA Consumer Financial Services Basics Virtual Conference, October 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

The Changing Dynamics of Litigation & Enforcement, CDIA 2020 Virtual Law & Industry Conference, September 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 2011

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

Federal FCRA and FTC Enforcement Initiatives, 24th Annual Payment Card Institute, May 2010

The Inside Straight on the Changing Government Role in the Economy, ACA International's 70th Annual Convention, July 2009

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

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

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

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

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

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

Current Topics in Credit Reporting and Credit Scoring, American Financial Services Association, 8th Annual State Government Affairs Forum, September 2006