



## Justin B. Hosie

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## PRACTICE AREAS



## Professional Experience

Justin is a partner and chair of the firm's Small Dollar and Alternative Financial Services Practice Group. He focuses his practice on regulatory compliance for alternative financial service providers including fintech providers, consumer lenders, buy-now-pay-later providers, wage advance providers, and virtual rent-to-own providers. Justin provides guidance on new product development, compliance management systems, and consumer disclosures. He provides third-party compliance opinions and day-to-day compliance advice. Justin counsels clients on compliance with state and federal consumer protection laws, including the Electronic Funds Transfer Act, Fair Credit Reporting Act, Gramm-Leach-Bliley Act, Truth-in-Lending Act, Restore Online Shoppers Confidence Act (ROSCA), the E-SIGN Act, CAN-SPAM Act, Military Lending Act, and the Servicemembers Civil Relief Act, among others.

Before joining Hudson Cook, Justin was a shareholder at Chambliss, Bahner, and Stophel, where he started as an associate in 2003.

Justin is a frequent presenter to various industry groups on consumer financial regulations, the CFPB,

innovation, and ethics. He also co-presents Hudson Cook's monthly CFPB Bites webinar series with partner Eric Johnson. Justin is AV rated by Martindale Hubbell and is recognized in *The Best Lawyers in America*®2022 for Financial Services Regulation Law.

Justin is a former Co-Chair of the American Bar Association's Section of Business Law - Consumer Finance Committee, Task Force on Small Dollar Lending/Prepaid Cards. He is also a former Vice Chair of the American Bar Association's Section of Business Law - Consumer Finance Committee, Pro Bono Subcommittee. He is a member of the Florida Bar and the Tennessee, Chattanooga and Federal Bar Associations.

Justin received his law degree from Stetson University College of Law. He holds a Bachelor of Arts degree in Political Science from the University of Kentucky.

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## Professional Activities

Former Co-Chair, American Bar Association's Section of Business Law - Consumer Finance Committee, Task Force on Small Dollar Lending/Prepaid Cards

Former Vice Chair, American Bar Association's Section of Business Law - Consumer Finance Committee, Pro Bono Sub-committee

Member, Florida Bar

Member, Tennessee Bar

Member, Federal Bar Association

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## Speaking Engagements

- "[CFPB's Proposed Registry of Terms & Conditions](#)," NAF Association's Power 30 Webinar Series, October 2023
- "BNPL 2.0: Where Do We Go From Here?" Fintech Nexus, May 2023
- "TILA & Regulation Z: Common Material Violations," ACUIA 32nd Annual Conference & One Day Seminar, June 2022
- "CFPB Rulemaking: It's (Maybe) Time to Comply with the Payment Provisions," INFiN MoneyTrends, November 2021
- "Expanding Your Business: New Products and Innovative Practices," INFiN MoneyTrends," November 2021
- "Major Trends in Financial Services Regulation," INFiN MoneyTrends," November 2021

- "Nuts and Bolts Compliance: Federal and State Exam Prep for Lenders and MSBs," INFiN Webinar, May 2021
- "CFPB Bites of the Month," Hudson Cook Webinars, January 2020 - Present
- "RCC/RCP and OLA Best Practices - How to Comply," OLA Compliance University Virtual Conference, July 2020
- "Insights and Strategies for Payments in Today's Economy," OLA Compliance University Virtual Conference, July 2020
- "Emerging from Quarantine: Unmasking Key Considerations for Small Dollar Lenders," Hudson Cook Webinar, May 2020
- "Consumer Protection Considerations for Small Dollar Lenders During Covid-19," Hudson Cook Webinar, April 2020
- "Happy Anniversary?! Kraninger's first year at the CFPB," Hudson Cook Webinar, December 2019, co-presented with Eric Johnson and Lucy Morris
- "Installment Lending: 2019 in a Nutshell," Short-Term Loan Bar Association, November 2019
- "Regulatory Favor or Fervor - Decoding mixed messages about Wage Advance," Short-Term Loan Bar Association, November 2019
- "The View from Washington: A Federal Regulatory and Legislative Update," FiSCA MoneyTrends 2019, October 2019
- "The CFPB Small-Dollar Rule: Don't Forget the Payments Provisions," FiSCA MoneyTrends 2019, October 2019
- "CFPB Update," FiSCA MoneyTrends 2019, October 2019
- "Emerging Products," FiSCA MoneyTrends 2019, October 2019
- "Update on Small Dollar Lending and Alternative Financial Services," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019
- "Transitioning to Installment Loans," Short-Term Bar Association Annual Conference, November 2018
- "Alternatives to Payday Loans: Developments in Lending and Other Products," FiSCA Annual Conference & Expo: Money Trends in Alternative Financial Services," October 2018
- "Hot Topics in the State Legislative and Regulatory Arena," FiSCA Annual Conference & Expo: Money Trends in Alternative Financial Services," October 2018
- "An Update on Small Dollar Lending and Alternative Financial Services," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2018
- "Web Content Accessibility Under the Americans with Disabilities Act," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2018

- "What Were They Really Thinking," Short-Term Loan Bar Association Annual Conference, November 2017
- "Open End Credit Opportunities," Short-Term Loan Bar Association Annual Conference, November 2017
- "ADA, Web Site Accessibility, DOJ Rulemaking," Short-Term Loan Bar Association Annual Conference, November 2017
- "Innovations and Ethics," Conference on Consumer Finance Law Annual Consumer Financial Services Conference, November 2017
- "CFPB's Recent Payday Rule's Impact on Lending Activities in Certain States," State Legislative Interests Group 2018 Planning Meeting, November 2017
- "First Takes on the CFPB Small Dollar Rule: What it Means for You," Hudson Cook Webinar, October 2017
- "CFPB Update: Small-Dollar Loan Rules; Operating Under the New Regime," FiSCA Conference & Expo, October 2017
- "The CFPB's Small-Dollar Rule: What Just Happened?" FiSCA Conference & Expo, October 2017
- "First Takes on the Final Rule," FiSCA Conference & Expo, October 2017
- "Innovations and Ethics," Conference on Consumer Finance Law Annual Consumer Financial Services Conference, May 2017
- "Alternative Finance Panel," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2017
- "Ethics: The Crossroads of Innovation and Evasion: Where Creativity and Ethics Can Collide," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2017
- "Circumventing the Rule - New Products - The Cutting Edge," 2016 Payday Loan Bar Association Annual Conference, November 2016
- "Utilizing eSignatures: No Pen and Paper Required," Lorman Education Services Live Webinar, October 2016
- "CFPB Small-Dollar Loan Rules: A Deep, Deep Dive," 2016 Annual FiSCA Conference & Exposition, October 2016
- "CFPB Enforcement, Guidance, & Proposed Rules," Louisiana Finance Association 58th Annual Conference, July 2016
- "CFPB Payday Loan Rulemaking," Community Financial Services Association of America & Hudson Cook Webinar, July 2016
- "Financial Services Law I," AFSA Edge Program, June 2016

- "CFPB Proposed Rules," Financial Service Centers of America Board Meeting, June 2016
- "Lay of the Legal Land," CNPEXpo, May 2016
- "Federal Rulemaking - Small Dollar Lending," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2016
- "Federal Rulemaking in 2016 - What to Expect and Alternative Products to Consider," CFSA Annual Meeting, March 2016
- "Compliance Issues with New Products/How Products will Likely Look after CFPB Rule," Online Lenders Alliance Compliance University, July 2015
- "Federal Regulatory Encroachment - Small Dollar Lending and Military Lending 2015," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, June 2015
- "The CFPB's Forthcoming Small Dollar Rule," 2015 California Finance Service Providers Conference, April 2015
- "What Does 'Abusive' Mean (v 2.0)," 2014 Payday Loan Bar Association Annual Conference, November 2014
- "The CFPB Examination Process," 2014 Annual FiSCA Conference & Exposition, October 2014
- "Compliant Collections Under the Dodd-Frank Act," 2014 Annual FiSCA Conference & Exposition, October 2014
- "The Nuts and Bolts of Auto Title Lending," 2014 Annual FiSCA Conference & Exposition, October 2014
- "Effective Strategies for Responding to CFPB CIDs," Financial Service Centers of Mississippi, August 2014
- "CFPB Examinations of Financial Service Providers: Be Ready When the Time Comes," Financial Service Centers of Mississippi, August 2014
- "Compliance Management Systems: A Critical Component of Compliance," Financial Service Centers of Mississippi, August 2014
- "A Primer on the Dodd-Frank Act, CFPB and Federal Regulation of Financial Service Center Providers," Financial Service Centers of Mississippi, August 2014
- "Payment Processors, Remotely Created Checks, Bitcoins," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, May 2014
- "Title Lending: The Legal Underpinnings," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, May 2014
- "New Products: Diversification and Compliance Concerns," CFSA Annual Meeting, February 2014
- "The Bermuda Triangle of Fair Lending: Lead Generation, Underwriting and Denial," Payday Loan Bar

Association, November 2013

- "TILA Disclosures Lost at Sea, Auto-Renewals under TILA and State Law," Payday Loan Bar Association, November 2013
- "Fair Lending," FiSCA Annual Meeting, October 2013
- "Title Lending," FiSCA Annual Meeting, October 2013
- "Payday Lending and its Alternatives," American Bar Association, Business Law Section, Consumer Financial Services Committee, Young Lawyers Subcommittee, Beer & Basics, Annual Meeting, August 2013
- "Title Lending: The Legal Underpinnings," Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, May 2013
- "The Big Picture: Industry Compliance and New Product Developments," CFSA Annual Meeting, March 2013
- "CFPB Exam Procedures for Short-Term, Small-Dollar Lending - Module 2 Provisions Addressing: ECOA, FCRA, TILA and Other Risks," FiSCA Annual Meeting, October 2012
- "West Virginia Runs Amok," Payday Loan Bar Association, October 2012
- "The Servicemembers Civil Relief Act: How it Affects Collections," Lorman Education Services, October 2012
- "The CFPB, FCRA, and ECOA - Considerations for Small Dollar Lenders," Clarity Services, Inc., June 2012
- "Practicing in a Time of Change: How to Survive and Thrive," American Bar Association 2011 Annual Meeting, 2011
- "Personal Finance," Junior Achievement, 2011
- "CAN-SPAM Act," Chattanooga Technology Council, 2011
- "Plain Language Drafting and Arbitration Clauses," 2011 Annual Meeting - Payday Loan Bar Association, 2011
- "Your Lawyer's Worst Nightmare, Compliance Issues That Keep Us Awake," OLA - Annual Meeting, 2010
- "ACH Debit Authorizations, Recent Bankruptcy and Security Interest Cases," Payday Loan Bar Association, 2010
- "Mobile Payments, Robo-calls and Text Messages," Payday Loan Bar Association, 2010
- "Imminent Regulatory Changes Before the New Bureau," OLA Webinar, 2010
- "ACH Developments 2010," OLA Webinar, 2010

- "Defining the Boundaries: Impact of Data Compromises and Other Legal Issues on Risk Management," Merchant Acquirers' Committee 2009 Annual Meeting, 2009
- "Street Law - Consumer Finance," Street Law Diversity Pipeline, 2009
- "State Legislation: New Ways to Deliver Small Dollar Consumer Credit Online," OLA Annual Meeting, 2009
- "Incorporating New Products in a Monoline Operation," CFSA 2009 Annual Meeting, 2009
- "Mobile Banking: How to Make it Work," 2009 OLA Annual Meeting, 2009
- "Your Bank or Credit Union: Payday Lending and Small Dollar Loans," 2008 Meetings: FDIC Alliance for Economic Inclusion, Dallas Region, 2008
- "Street Law - Contracts," Street Law Diversity Pipeline, 2008

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## Publications

- "Tik Tok: The Compliance Clock Is Ticking for Small-Dollar Lenders in 2020," *The Business Lawyer*; Vol. 76, Spring 2021, co-authored with Christopher J. Capurso, Erica A.N. Kramer, Andrea S. Cottrell, K. Dailey Wilson and Hurshell K. Brown
- "Earned Wage Access and the CFPB: A Path Toward Regulatory Acceptance?," *Business Law Today*, March 2021, co-authored with Chris Capurso
- "Earned Wage Access - Now with Fees: A Low-Cost Credit Alternative or State Regulatory Minefield?," Hudson Cook *Insights*, February 2021, co-authored with Chris Capurso
- "CFPB Bites of the Month - Monthly Top 10," Hudson Cook *Insights*, October 2020 - Present, co-authored with Eric Johnson and Chris Capurso
- "CFPB Releases Advisory Opinion Finding that Earned Wage Access Programs, When Structured Properly, Are Not Credit Under TILA and Regulation Z," Hudson Cook *Insights*, December 2020, co-authored with Chris Capurso
- "Small Dollar Lending Regulation in 2019," *The Business Lawyer*; Vol. 75, Spring 2020, co-authored with K. Dailey Wilson, Erica A.N. Kramer, and Christopher J. Capurso
- "New Federal Tool for Calculating APRs," Hudson Cook *Insights*, April 2020
- "The CFPB 4.0 - A Year of Changes: New Director, New Developments, New Directions," *FiSCA Currents*, Spring 2019, co-authored with H. Blake Sims
- "The Walking Dead: 2018 Small Dollar Lending Updates-Is the Small Dollar Loan Industry Mostly Dead or Slightly Alive?" *The Business Lawyer*, Spring 2019, Volume 74, Issue 2, co-authored with K. Dailey

Wilson, Erica A.N. Kramer and Andrea S. Cottrell

- "Choice-of-law clauses in online loans with consumers," *Westlaw*, October 2018, co-authored with K. Dailey Wilson
- "Stranger Things: Small-Dollar Lending Updates and the Arrival of a Final Rule," *The Business Lawyer*, Spring 2018, co-authored with K. Dailey Wilson and Erica A.N. Kramer
- "CFPB's Short-Term and Installment Loan Rule Results in Unintended Consequences for the Auto Financing Industry," *Spot Delivery*, November 2017
- "Web Content Accessibility under the Americans with Disabilities Act," *Spot Delivery*, September 2017
- "2016 Small-Dollar Lending Update: An Obituary or a Re-Awakening," *The Business Lawyer*, Spring 2017
- "Credit Card Issuers, Be Warned: The Military Lending Act is on its Way," Hudson Cook *Insights*, December 2016
- "CFPB Issues New Policy Encouraging Fintech Innovation," FINOVATEBLOG, March 2016
- "Update on Tribal Loans to State Residents," *The Business Lawyer*, Vol. 68, No. 2, February 2013
- "Does Your Website Comply with the Children's Online Privacy Protection Act?" *The \$3 Million Question, Online Banking Report*, Number 194/195, July 2011
- "What to Make of the New Internet Authentication Guidance," *BankInnovation.net*, 2011
- "FCC's 'Robocall' Rule Will Hit CUs," *Credit Union Journal*, 2011
- "Ameriloan and Suthers, is Tribal Lending the New Preemption," *American Bar Association - Section of Business Law - Consumer Financial Services Newsletter*, 2011
- "When is a cheque not a cheque?" *Journal of Payments Strategy & Systems*, Vol. 3, No. 2., 2009
- "Mobile Banking Legal Considerations," *Online Banking Report*, 2009
- "DEEEECLINED! Get the Details about Your Notice of Denial!" *Credit.com*, 2009
- "Unflush my credit report: Are credit repair organizations legal? Are they helpful?" *Credit.com*, 2009
- "Presentation Summary: Internet Delivery/Electronic Banking and Federal and State Trade Practices - Program on Old Schools, New Rules: Bank Agency Rulemaking under the FTC Act and HOEPA," *American Bar Association - Section of Business Law, Consumer Financial Services Committee Newsletter*, 2008
- "Anything You Say Will Be Used Against You" *Online Banking Report*, 2008



## Recognition and Accomplishments

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## Education

Stetson University College of Law, J.D., 2003

University of Kentucky, B.A. in Political Science, 2000

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## Admissions

Florida, 2003

Tennessee, 2004