



Erica A.N. Kramer

May 30th, 2024

Professional Experience



As a partner in our Tennessee office, Erica focuses her practice on federal and state regulatory compliance. She assists a variety of consumer financial services companies including installment lenders, solar financing companies, and auto finance companies with preparing compliance strategies and programs designed to meet complex regulatory requirements and ensure operational success.

Erica works with clients to:

- Ensure compliance with the Military Lending Act, Servicemembers Civil Relief Act, and Americans with Disabilities Act (particularly as it relates to the accessibility of web content).
- Analyze fair lending issues frequently encountered in the consumer financial services industry to assist clients with developing controls to mitigate perceived or actual discriminatory use of data based on prohibited characteristics, including by helping clients with qualitative model attribute reviews and statistical reviews, as well as by evaluating model risk management governance policies and procedures.
- Assist furnishers of credit information under the Fair Credit Reporting Act with Furnisher Rule compliance and furnishing-related questions.
- Advise on strategies designed to reduce risk associated with analyzing and reporting sensitive information about consumers, such as health information.

Erica is committed to helping financial services companies meet regulatory challenges with confidence while maintaining compliance and operational efficiency.

Before joining Hudson Cook, Erica was a Staff Attorney at Bay Area Legal Services, Inc., where she practiced family and housing law. She also worked as an attorney at Murnaghan & Ferguson, P.A., focusing on construction litigation.

Erica is a member of The Florida Bar and the Tennessee Bar Association. She also serves on the Board of Grace Point Camp and Retreat Center in Kingston, TN.

Erica earned her J.D. from Stetson University College of Law and holds a Bachelor of Science degree in Integrated Strategic Communications from the University of Kentucky.

Outside of the office, Erica enjoys live music, reading, and spending time with her family.

Practice Areas

Credit Reporting, Privacy and Data Security

Residential Property Management

Small Dollar Lending and Alternative Consumer Financial Services

Professional Affiliations & Certifications

- Member, The Florida Bar
- Member, Tennessee Bar Association

Speaking Engagements

- “Update on Alternative Consumer Financial Services,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, November 2025
- “Can’t Buy Me Love. But can you give me early access to my earned wages?” Hudson Cook Compliance Coffee Break, September 2025
- “What Act 1 of the Trump 2.0 Era Means for Rental Property Operation,” Residential Property Management – Webinar Series, co-presented with Jay Harris, February 2025
- “Disputes under the Fair Credit Reporting Act,” co-presented with Jennifer Sarvadi, Consumer Data Industry Association Metro 2@ Workshop, November 2024
- “Whatcha gonna do? Whatcha gonna do when [that identity theft report] comes for you?,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, co-presented with Megan Nicholls, November 2024
- “Responding to Direct Disputes under the FCRA,” NAF Power 30 Webinar Series, February 2024
- “Investigating Credit Disputes under the FCRA,” Consumer Data Industry Association Webinar, February 2024
- “Furnishers’ Responsibilities: Recent Regulation and Litigation,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, co-presented with Jay Harris and Troy Kubes, October 2023
- “Fair & Responsible Lending, Disparate Treatment & Impact, NAF Power 30 Webinar Series, March 2023
- “Stop, Collaborate, and Listen: Strategies for Handling Consumer Complaints,” Professional Background Screening Association, September 2022
- “Servicemembers Civil Relief Act Updates?,” NAF Association Power 30 Webinar Series, September 2022
- “Strike a Pose! Biometric Privacy, Driver’s License and Other Laws Impacting Your Use of Photo IDs,” Hudson Cook Compliance Coffee Break, co-presented with Rebecca Kuehn, Webb

McArthur and Erik Kosa, June 2022

- “Financial Services Law I,” AFSA’s THE EDGE, co-presented with K. Dailey Wilson, June 2022
- “Time For a Website Check-up – A Primer on ADA and UDAAP Website Compliance,” Hudson Cook Compliance Coffee Break, co-presented with Andrea Cottrell, February 2022
- “Financial Services Law I,” AFSA’s THE EDGE, September 2021
- “Serving consumers with limited English proficiency (LEP),” Hudson Cook Compliance Coffee Break, June 2021
- “Serving Limited English Proficiency (LEP) Customers: What CFPB’s New LEP Guidelines Mean for Your Company,” OLA Compliance University, May 2021
- “Buyer’s & Seller’s Summit: Americans With Disabilities Act – What Every Website Owner/Operator Needs to Know Today,” LeadsCon Virtual Conference, September 2020
- “Americans With Disabilities Act – What You Need To Know,” LeadsCouncil Webinar, August 2020
- “Americans with Disabilities Act – What You Need to Know,” LeadsCouncil Webinar, June 2020
- “Web Content Accessibility – The CCPA and Beyond,” Hudson Cook Webinar, May 2020
- “ADA Compliance Monitoring: What You Need to Know,” Inside Credit Conference, February 2020
- “Financial Services Law I,” AFSA’s THE EDGE, June 2019
- Accommodating Vulnerable Consumers: Dissecting Complex Legal Issues Regarding the Accessibility of Financial Products and Services, Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, co-presented with Andrea S. Cottrell and K. Dailey Wilson, April 2019
- “Web Content Accessibility under the Americans with Disabilities Act,” Hudson Cook, LLP Compliance Coffee Breaks, March 2019
- “Small Dollar Industry Updates,” Hudson Cook, LLP Webinar in Conjunction with Community Financial Services Association of America, March 2019
- “Financial Services Law I,” AFSA – The Edge Conference, co-presented with W. David Hicks, June 2018
- “Military Lending Developments,” Consumer Financial Services Conference, Hudson Cook/Counselor Library, co-presented with Michael A. Benoit, A. James Chareq, and L. Jean Noonan, April 2018
- “Web Content Accessibility under the Americans with Disabilities Act,” Consumer Financial Services Conference, Hudson Cook/Counselor Library, co-presented with Justin B. Hosie, April 2018
- “Web Content Accessibility under the Americans with Disabilities Act,” Short-Term Lending Legal Summit, co-presented with Justin B. Hosie, November 2017

- “Military Lending Act Developments,” Consumer Financial Services Conference, Hudson Cook/Counselor Library, April 2017
- “CFPB Enforcement, Guidance, & Proposed Rules,” Independent Consumer Finance Association of South Carolina (ICFA), June 2016
- “SCRA and Military Lending Issues,” Consumer Financial Services Conference, Hudson Cook/Counselor Library, April 2016

Publications

- “CFPB Proposes Changes to Regulation B,” *Spot Delivery*, December 2025
- Consumer Financial Protection Bureau: “CFPB Publishes Report on Auto Financing by Servicemembers,” *Spot Delivery*, March 2025
- “FTC Targets Accessibility Overlays,” Hudson Cook *Insights*, January 2025
- “A Retrospective of the CFPB’s Activities Regarding Earned Wage Access, CCFL Quarterly Report, December 2024, co-authored with Justin B. Hosie
- Industry News: “Big Three Strikes, and Dealers are Out,” *Spot Delivery*, October 2023, co-authored with Laura J. Bacon
- Federal Regulation: “DOJ Proposes Rule on Web Content Accessibility for Governmental Entities,” *Spot Delivery*, September 2023
- Miscellaneous Fees: “Indiana DFI Publishes Advisory Letter on Permissibility of E-Lien Fees,” *Spot Delivery*, August 2023
- Dealer/Manufacturer Relations: “Indiana Provides New Protections for Dealers,” *Spot Delivery*, June 2023
- “Is Your Dealership Ready for the Electric Vehicle Wave?,” *Tennessee Dealer News*, Winter 2023
- Guaranteed Automobile Protection: “Colorado AG Announces Settlement with Credit Unions over GAP Refunds,” *Spot Delivery*, March 2023, co-authored with Laura J. Bacon
- “Heightened Regulatory Interest on Military Lending Act Compliance Continues,” Hudson Cook *Insights*, December 2022
- Voluntary Protection Products: “New California Law Impedes Creditors’ Ability to Offer Voluntary Protection Products to Military Servicemembers,” *Spot Delivery*, November 2022, co-authored with Catharine S. Andricos
- Vehicle Sales: “Is Your Dealership Ready for the Electric Vehicle Wave?,” *Spot Delivery*, October 2022, co-authored with Laura J. Bacon
- Federal Enforcement: “Federal Agencies Continue Heightened Scrutiny of Servicemembers Civil Relief Act Compliance,” *Spot Delivery*, September 2022
- “Thinking of Accepting Payments from Customers via Discretionary Military Allotments? Think Again.,” Hudson Cook *Insights*, August 2022
- Miscellaneous Fees: “Indiana Court Addresses Document Preparation Fees,” *Spot Delivery*,

January-February 2022

- Federal Law: “Virginia and Florida Courts Issue Decisions on Military Lending Act Coverage of Motor Vehicle Retail Installment Sales,” *Spot Delivery*, July 2021
- Federal Law: “Web Content Accessibility Continues to Make Headlines,” *Spot Delivery*, June 2021
- “Equality in Credit Decisions – “Sex” DOES include Sexual Orientation and Gender Identity,” *Tennessee Dealer News*, Spring 2021, co-authored with Dailey Wilson
- “Tik Tok: The Compliance Clock Is Ticking for Small-Dollar Lenders in 2020,” *The Business Lawyer*; Vol. 76, Spring 2021, co-authored with Justin B. Hosie, K. Dailey Wilson, Andrea S. Cottrell, Christopher J. Capurso and Hurshell K. Brown
- “CFPB Announces Broad Military Lending Act Compliance Sweep,” *Hudson Cook Insights*, December 2020
- “Equality in Credit Decisions – Does ‘Sex’ include Sexual Orientation and Gender Identity?” *Hudson Cook Insights*, July 2020, co-authored with Dailey Wilson
- “ADA Web Content Accessibility Considerations During a Pandemic,” *Hudson Cook Insights*, July 2020
- “Serving Customers in the Midst of the Pandemic,” *Tennessee Dealer News*, Spring 2020, co-authored with Ron Gorsline
- “Small Dollar Lending Regulation in 2019,” *The Business Lawyer*; Vol. 75, Spring 2020, co-authored with Justin B. Hosie, K. Dailey Wilson, and Christopher J. Capurso
- “New Policy on Prohibition of Abusive Acts or Practices – What do you need to know?,” *Tennessee Dealer News*, Winter 2020, co-authored with Ron Gorsline
- “Update: Supreme Court Declines to Review Web Content Accessibility Suit Against Domino’s Pizza,” *Hudson Cook Insights*, December 2019, co-authored by Ronald D. Gorsline
- “Is Your Website ADA Accessible?,” *NIADA’s Used Car Dealer Magazine*, December 2019
- “Don’t Forget About the Military Lending Act,” *Tennessee Dealer News*, Sept/Oct 2019, co-authored by Ron Gorsline
- “FTC’s Rules of the Road for Advertising: A Five-Point Inspection,” *Spot Delivery*, September 2019, co-authored by Dailey Wilson
- “Lawfully Serving Servicemembers,” *Tennessee Dealer News*, July/August 2019, co-authored by Ronald D. Gorsline
- “Does the DOD’s MLA Interpretive Rule Really Help Servicemembers,” *RMA Industry Insider*, December 2018, co-authored by Patricia E.M. Covington
- “How the Military Lending Act Plagues the Finance Industry,” *Corporate Compliance Insights*, November 2018, co-authored by Patricia E.M. Covington
- “Military Lending Act Compliance Continues to Plague Auto Finance Industry,” *Hudson Cook Insights*, October 2018, co-authored by Patricia E.M. Covington
- “CFPB to Eliminate Military Lending Supervisory Exams Amid DoD Regulatory

Changes,” *Auto Finance News*, August 2018

- “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 Justin B. Hosie
- “OCC Releases Military Lending Act Booklet,” *Hudson Cook Insights*, June 2018
- “SCRA Settlement with DOJ Soars to Over \$10 Million,” *Spot Delivery*, December 2017
- “CFPB’s Short-Term and Installment Loan Rule Results in Unintended Consequences for the Auto Financing Industry,” *Spot Delivery*, November 2017, co-authored by Justin B. Hosie
- “CFPB Zeroing in on Creditor/Vendor Relationship,” *Spot Delivery*, October 2017, co-authored by H. Blake Sims
- “Web Content Accessibility under the Americans with Disabilities Act,” *Spot Delivery*, September 2017, co-authored by Justin B. Hosie
- “Web Content Accessibility Gets New Scrutiny Under the Americans with Disabilities Act,” *Carpliancecenter.com*, September 2017, co-authored by Justin B. Hosie
- “Time to Prepare for Military Lending Act Compliance,” *Law360*, August 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, co-authored by Justin B. Hosie
- “Regulatory Burden Shifting for SCRA Compliance,” *Spot Delivery*, November 2016
- “Uncle Sam Wants YOU to Comply with the Military Lending Act,” *Non-Prime Times*, National Automotive Finance Association, November 2016, co-authored by Ronald D. Gorsline
- “Uncle Sam Wants YOU to Comply with the Military Lending Act,” *Spot Delivery*, August 2016, co-authored by Ronald D. Gorsline
- “Death by a Thousand Cuts: Update on Small-Dollar Lending,” *71 Bus. Law 741*, Spring 2016, co-authored by Catherine M. Brennan, Justin B. Hosie and K. Dailey Wilson
- “CFPB Sets Sights on Data-Security Practices,” *FINOVATE BLOG*, March 2016, co-authored by Justin B. Hosie
- “CFPB Issues New Policy Encouraging Fintech Innovation,” *FINOVATE BLOG*, March 2016, co-authored by Justin B. Hosie
- “Congressional Staff Report Highlights Lengths to Which CFPB Will Go to Validate Its Claims,” *Spot Delivery*, January/February 2016, co-authored by L. Jean Noonan