



L. Jean Noonan

May 30th, 2024

Professional Experience



Jean assists financial institutions and businesses with navigating complex consumer financial services, fair lending, marketing, privacy and consumer reporting, and consumer protection laws. Jean is Chair of our firm's Fair Lending Practice Group and is highly regarded for her deep knowledge of fair lending laws, spanning 50 years as a partner in our Washington, DC office, she provides strategic counsel on complex regulatory compliance issues and represents clients in government investigations, examinations, and enforcement actions before federal agencies, including the Consumer Financial Protection Bureau (CFPB), Federal Trade Commission (FTC), Department of Justice, and federal banking regulators.

With deep experience in consumer financial services law, Jean advises clients on:

- Compliance with federal and state consumer credit, privacy, and telemarketing laws.
- Preparation for and guidance during supervision and visitation exams.
- Defense strategies for government investigations and enforcement actions.
- Risk management in marketing and fair lending practices.

Before joining Hudson Cook, Jean held key leadership roles in government. She is a former Senior Executive with the FTC, where she directed the agency's enforcement of consumer financial services laws. Jean next served as General Counsel of the Farm Credit Administration (FCA), an independent federal bank regulatory agency. She has testified before Congress on consumer financial services issues and is a sought-after speaker at industry conferences.

Jean is a Founding Member of the American College of Consumer Financial Services Lawyers (ACCFSL) where she recently concluded a 10-year term on its Executive Committee, including a term as President. She has held numerous leadership positions within the American Bar Association's Business Law Section and has long served on the Governing Committee of the Conference on Consumer Finance Law. In 2020, she was appointed to the CFPB's Task Force on Federal Consumer Financial Law, where she co-authored a 900-page report, which supported its 102 recommendations.

Jean is committed to helping businesses stay compliant in a rapidly evolving regulatory environment while mitigating risk, finding creative solutions for difficult regulatory problems, and fostering responsible innovation. Jean has often served as an expert witness, especially on credit reporting issues, drawing on her background as an enforcer of consumer financial laws for the FTC

and FCA for over 20 years and her long experience helping financial service providers navigate complex regulatory issues.

Jean taught consumer transactions law for seven years as an adjunct professor at The Catholic University of America Columbus School of Law, in Washington, DC, and remains involved in legal education. When time permits, Jean enjoys travel, rowing, reading, and time with her two sisters and family. She is trying to learn Spanish and how to grow orchids.

Practice Areas

Credit Reporting, Privacy and Data Security

Federal Trade Commission

Government Oversight and Enforcement

State Enforcement

Professional Affiliations & Certifications

- Governing Committee, Conference on Consumer Finance Law, 2002 – Current
- Member, CFPB Taskforce on Federal Consumer Financial Law, January 2020 – January 2021
- Consumer Financial Services Committee of the American Bar Association Business Law Section; Chair, Federal and State Trade Practices Subcommittee (2004 – 2006); Vice-Chair, Privacy Subcommittee (2002 – 2004); Chair, Federal Trade Commission Activities Subcommittee (1988 – 1992); Vice-Chair, Federal Trade Commission Activities Subcommittee (1986 – 1988), 1986 – Current
- Founding Member, American College of Consumer Financial Services Lawyers, 1996; Immediate Past President, President, President-Elect, Treasurer, and Secretary (2017-2025); Board of Regents (1998 – 2002, 2017- current); Chair, Lifetime Achievement Award Committee (2002 – 2005); Chair, Writing Competition (2015)
- Council Chairman, Town of Chevy Chase View, Maryland, 2000 – 2003

Speaking Engagements

- “Auto Lending Legal & Compliance Landscape, March 2026
- “Ethic Presentation: How Lawyers Can Use AI Without Getting Disbarred!” Twenty-First Annual Financial Services Conference, Hudson Cook/Counselor Library, Baltimore, MD, November 2025
- “As Goes California ...? The California CARS Act and Consumer Privacy Act Regulations,” December 2025
- “The Washington Scene: Is Regulation Dead?” RouteOne Auto Finance Webinar, October 2025
- “Fair Lending Roundup: What a Year!” Conference on Consumer Finance Law, Chicago, May 2025

- “Fair Lending: Oh, What a Year!” Twentieth Annual Financial Services Conference, Hudson Cook/Counselor Library, Baltimore, MD, November 2024
- “Fair Lending,” ABA National Institute of Consumer Financial Services Basics Virtual Conference, October 2024
- “The Washington Scene, CFPB and FTC Updates,” RouteOne Auto Finance Webinar, November 2024
- “Vehicle Shopping Rule Update and Compliance Guidance,” National Auto Dealers Association Webinar, November 2024
- “Voluntary Protection Products in the Cross-Hairs: The Risks and How to Mitigate Them,” Protection Products Vendors Trade Associations’ Annual Meeting, New Orleans, September 2024
- “SCOTUS, FTC, and CFPB Developments – Oh, My!” RouteOne Regulatory Auto Finance Webinar, August 2024
- “FTC Vehicle Shopping Rule: What It Means for My Dealership?!?” Keynote, Texas Independent Automobile Dealers Association Conference, San Antonio, TX, July 2024
- “Managing Human Resources at Your Dealership,” Texas Independent Automobile Dealers Association Conference, San Antonio, TX, July 2024
- “FTC Vehicle Shopping Rule and Regulatory Update,” Association of Dealer Compliance Officers *Compliance Unleashed* Conference, Grapevine, TX, May 2024
- “The FTC’s CARS Rule – The Impact on Finance Companies,” Hudson Cook Compliance Coffee Break webinar, March 2024
- “The FTC’s CARS Rule,” Hudson Cook Compliance Coffee Break webinar, February 2024
- “Hot Topics in Fair Lending,” webinar for the national legal staff of Citizens Bank, March 2024
- “The CFPB’s Small Business Lending Rule – Compliance Challenges Abound for Business Creditors,” Alternative Finance Bar Association, New York City, May 2024
- “Hot Topics at the CFPB and the FTC – CFPB Rules Are Challenged in Courts, FTC Brings Fair Lending
- Enforcement Actions and Attempts to Ban “Junk Fees,” RouteOne Regulatory Auto Finance Webinar, November 2023
- “Fair Lending,” ABA National Institute of Consumer Financial Services Basics Virtual Conference, October 2023
- “Cash Versus Credit Pricing and the CFPB: Pitfalls Abound,” Texas Independent Auto Dealer’s Conference, San Antonio, TX, July 2023
- “CFPB and FTC Regulatory, Litigation, and Enforcement Updates,” National Independent Auto Dealers Accelerate 2023 Conference, Las Vegas, June 2023
- “Forced-Place Insurance Simplified,” National Independent Auto Dealers Accelerate 2023 Conference, Las Vegas, June 2023
- “CFPB Small Business Lending Rule and FTC Hot Issues,” RouteOne Regulatory Update

Webinar, May 2023

- “Artificial Intelligence, Machine Learning, and Fair Lending: Tips on Handling Fair Lending Compliance When Working with Next Level Decisioning,” Eighteenth Annual Financial Services Conference, Hudson Cook/Counselor Library, Annapolis, MD, November 2022
- “Voluntary Protection Products: A Deep Dive Look at the FTC’s Proposed Trade Regulation Rule,” Eighteenth Annual Financial Services Conference, Hudson Cook/Counselor Library, Annapolis, MD, November 2022
- “What’s New in Fair Lending,” Eighteenth Annual Financial Services Conference, Hudson Cook/Counselor Library, Annapolis, MD, November 2022
- “Fair Access to Credit,” ABA National Institute of Consumer Financial Services Basics Virtual Conference, October 2022
- “Danger Points for Regulatory Enforcement,” Association of Consumer Vehicle Lessors Annual Conference, Plenary Session, Amelia Island, FL, September 2022
- “FTC’s Proposed Rule on Motor Vehicle Dealers: What It Means for Lessors,” Association of Consumer Vehicle Lessors Annual Conference, Legal Committee, Amelia Island, FL, September 2022
- “Transferability, Cancellations, and Refunds of Ancillary Products,” Association of Consumer Vehicle Lessors Annual Conference, Legal Committee, Amelia Island, FL, September 2022
- “FTC Auto Dealer Proposed Rule: A Bad Deal for Dealers,” Hudson Cook Webinar, August 2022
- “How Current Regulations at the CFPB and FTC Impact Your Business and Your Pocket,” NIADA Convention & Expo, Las Vegas, June 2022
- “Washington Regulatory Update: What’s Hot at the CFBP and FTC,” Association of Consumer Vehicle Lessors Spring Conference, Tax Committee, May 2022
- “What You Need to Know About the CFPB: Director Chopra’s First 30 Days, Enforcement Actions, and Reports on Credit File Disputes and Subprime Auto Finance,” RouteOne Auto Finance Regulatory Compliance Webinar, November 2021
- “Fair Access to Credit,” ABA National Institute on Consumer Financial Services Basics Virtual Conference, October 2021.
- “CFPB Regulatory Enforcement Priorities,” Route One Regulatory Compliance Webinar, September 2021
- “The New Enforcement Philosophy for CFPB & FTC,” TIADA Conference & Expo, July 2021
- “Fair Lending: Stormy Seas Ahead!” Seventeenth Annual Financial Services Conference, Hudson Cook/Counselor Library, May 2021
- “Keynote: Insights on the CFPB Taskforce on Consumer Credit,” AFSA 2021 Independents Conference and Expo, May 2021
- “The FTC and CFPB – What Should Auto Dealers and Auto Creditors Expect?” 2021 Virtual Financial Services Conference, May 2021

- “Fair Lending Developments,” 2021 Virtual Financial Services Conference, May 2021
- “New Directions for Consumer Finance Law – An Insider’s Look at the Report of the CFPB’s Taskforce,” CCFL Webinar, February 2021
- “CFPB Federal Consumer Law Taskforce Summary and Q&A,” CCIA Webinar, January 2021
- “CFPB Taskforce on Federal Consumer Financial Law Report – What Does it Mean for You?”, Hudson Cook Webinar, January 2021
- “Report of CFPB Taskforce on Consumer Financial Law – How 100 Recommendations Could Change Consumer Financial Services,” ABA Business Law Section Consumer Financial Services Committee 2021 Virtual Winter Meeting, January 2021
- “What To Expect from the Biden Presidency and CFPB Update,” Route One Regulatory Compliance Webinar, December 2020
- “The Next Chapter for Fair Lending,” Conference on Consumer Credit Law Webinar, December 2020
- “The Dark Side of Digital Ads: Are Consumers Online for Risk?” CBA Live 2020 Virtual, October 2020
- “The Future of Disparate Impact: The Re-examination of the Standards of Review by the Supreme Court, HUD and the CFPB,” ABA Business Law Section Consumer Financial Services Committee 2020 Winter Meeting, January 2020
- “Federal and State Law Update: Kraninger at the CFPB, Safeguards at the FTC, and Privacy in California,” Route One Regulatory Compliance Webinar, September 2019
- “Fair Lending,” ABA Business Law Section 10th Annual National Institute on Consumer Financial Services Basics, October 2019
- “Fair Access to Credit,” ABA National Institute of Consumer Financial Services Basics Conference, October 2019
- “Where do Things Stand in a Changing Fair Lending Landscape?” Sixteenth Annual Financial Services Conference, Hudson Cook/Counselor Library, April 2019
- “Washington, DC, After the Mid-Terms – What To Expect,” Route One Regulatory Compliance Webinar, December 2018
- “Fair Access to Credit,” ABA National Institute of Consumer Financial Services Basics Virtual Conference, October 2018
- “Redlining,” Consumer Bankers Association Fair and Responsible Banking Committee, October 2018
- “Fair Lending,” ABA National Institute on Consumer Financial Services Basics, October 2018
- “CFBP New Leadership and Hot Issues,” Route One Regulatory Compliance Webinar, September 2019
- “Fair Lending Under the New Regime: Where We Are and Where Are We Headed?” Fifteenth Annual Financial Services Conference, Hudson Cook/Counselor Library, April 2018
- “Advertising and the Equal Credit Opportunity Act,” ABA Consumer Financial Services

Committee, January 2018

- “Fair Access to Credit,” ABA National Institute of Consumer Financial Services Basics Conference, October 2017
- “CFPB Update: What a Long, Strange Trip It’s Been,” Route One Auto Finance Regulatory Compliance Webinar, September 2017
- “Fair Lending Developments: What You Need to Know,” Fourteenth Annual Financial Services Conference, Hudson Cook/Counselor Library, April 2017

Publications

- *F&I Legal Desk Book: The Answer Book for Finance and Insurance Professionals*, with others, (Thomas B. Hudson, ed.) 10th, CounselorLibrary.com, LLC, *accepted for publication*, 2026
- “Fair Lending Developments: The End of the Road? *The Business Lawyer*, *accepted for publication*, Spring 2026
- “Auto Dealers and the Enforcement Landscape: What Lies Ahead?” *Spot Delivery*, May 2025
- “Fair Lending Developments: Redlining Enforcement Continues to Flourish,” *The Business Lawyer*, Spring 2025
- “Fair Lending and Advanced Technologies: What the CFPB Thinks – or Thought,” *Spot Delivery*, March 2025
- “CFPB Aims a New Spotlight on Auto Finance Compliance Issues,” *Spot Delivery*, November 2024
- “A Look Under the Hood: FTC Will Test Legal Theories in Litigation Against a Large Dealer Group,” *Spot Delivery*, September 2024
- “Justice Department Settles SCRA Claims with the City of El Paso: The Lawsuits Keep Rolling,” *Spot Delivery*, September 2024
- “The FTC’s CARS Rule: What Dealers Need to Know,” *Spot Delivery*, March 2024
- “Fair Lending Developments: Redlining Enforcement Flourishes,” *The Business Lawyer*, Spring 2024
- “The FTC’s CARS Rule and Auto Creditors: Why Covered Dealers Are Not the Only Businesses that Need to Worry About Compliance,” *Spot Delivery*, April 2024
- “The FTC’s CARS Rule: What Dealers Need to Know,” *Spot Delivery*, March 2024
- “The Perils of Ignoring a Lease Purchase Option Price: A Case in Point,” *Spot Delivery*, January/February 2024
- “The FTC’s Cars Rule: Off to the Races or a Drive into a Ditch?” *Spot Delivery*, January/February 2024
- “The FTC Strikes Another Dealer Group: What to Worry About,” *Spot Delivery*, December 2023
- “Considering a Credit Applicant’s Immigration Status: What the Feds Want You to Know,” *Spot Delivery*, November 2023
- “Discrimination is Not ‘Unfair’: Another Court Loss for the CFPB,” *Spot Delivery*, October 2023

- “FTC Looks at Banning Spot Deliveries – Will ‘Yo-Yo’ Financing Become a ‘No-No?’” *Texas Dealer Magazine*, September 2023
- “Consumer Groups Say, ‘Yo-Yo Sales’ Are a ‘No-No’: Will the FTC Outlaw Spot Deliveries?” *Spot Delivery*, July 2023
- “Fair Lending Developments: Back to the First Step?” *The Business Lawyer*, Spring 2023
- “New Research on Dealer Rate Spreads: Evidence of Discrimination?” *Spot Delivery*, April 2023
- “What to Expect When You Are Expecting (Your First CFPB Examination),” *Spot Delivery*, April 2023
- “Discrimination Claims and Negotiated Pricing: No End to the Risk to Dealerships,” *Spot Delivery*, March 2023
- “Can Theory Be a Substitute for Evidence? The CFPB and ‘Unfair’ Subprime Auto Credit,” *Spot Delivery*, January/February 2023
- “New York Takes a Bank for a Ride over Alleged Discrimination in Indirect Auto Credit,” *Spot Delivery*, December 2022
- “Is Different Pricing for Non-Credit Products and Services Illegal Discrimination” Yes, Says the CFPB, Massachusetts, and the FTC,” *Spot Delivery*, November 2022
- “The FTC’s Auto Dealer Proposed Rule: The Critics Weigh In,” *Spot Delivery*, October 2022
- “The FTC’s Proposed Rule for Auto Dealers: A Serious Wrench in the Works,” *Spot Delivery*, August 2022
- “The FTC Puts the Pedal to the Metal: The Auto Dealer Proposed Rule,” *Spot Delivery*, July 2022
- “Refunds of GAP and Other Voluntary Protection Products – a Federal UDAAP Issue?” *Spot Delivery*, June 2022
- “FTC Doubles Down on Dealers: Deception and Discrimination in Financing and Sales,” *Spot Delivery*, May 2022
- “CFPB Blog on Used Car Costs and Auto Financing: A Few Fair Points and a Lot of Dreck,” *Spot Delivery*, April 2022
- “Discrimination Is ‘Unfair’: What the CFPB’s Statement Might Mean for Auto Finance,” *Spot Delivery*, April 2022
- “Consumer Reports Bashes States for “Loop-Hole Ridden” Auto Finance Laws: Some Fair Points with a Bad Solution,” *Spot Delivery*, March 2022
- *F&I Legal Desk Book: The Answer Book for Finance and Insurance Professionals*, with others, (Thomas B. Hudson, ed.) 9th, CounselorLibrary.com, LLC, 2021.
- “CFPB Data Point Studies Subprime Financing Rates and Default Risks Across Creditor Types,” *Spot Delivery*, December 2021
- “Learning from the Mistakes of Others—CFPB’s Summer 2021 Supervisory Highlights,” *Spot Delivery*, October 2021
- “Fair Lending Developments: Disparate Impact Lives On,” *The Business Lawyer*, Spring 2021

- “Supreme Court De-Fangs the FTC: What This Development Means for Auto Dealerships,” *Spot Delivery*, May 2021
- “Risk Reward Will Always Be Part of the Subprime Future,” *Texas Dealer Magazine*, May 2021
- “Navigating the Minefields When Offering a Consumer, the ‘Lowest Rate,’” *Spot Delivery*, April 2021
- “CFPB: The Consumer and Dealer Relationship,” *Texas Dealer Magazine*, May 2021
- “CFPB: The Roadmap Forward – Part Three,” *Texas Dealer Magazine*, May 2021
- “CFPB: The Roadmap Forward – Part One,” *Texas Dealer Magazine*, April 2021
- “CFPB: The Roadmap Forward – Part Two,” *Texas Dealer Magazine*, March 2021
- How CFPB taskforce report might impact auto financing,” *Auto Remarketing*, March 2021
- Consumer Financial Protection Bureau, The Report of the CFBP Taskforce on Consumer Financial Law (2021)
- “CFPB Taskforce Report of Federal Consumer Financial Law: How It Might Affect Auto Finance Regulation,” *Spot Delivery*, January/February 2021
- “Dealerships with Protection Product Marketing Mistakes: How to Avoid the Honor,” *Spot Delivery*, October 2020
- “American Bar Association: At Last, a Good Auto Sales and Finance Resolution,” *Spot Delivery*, September 2020
- “HUD Releases Final Disparate Impact Rule,” ABA Business Law Today Month-in-Brief, September 2020
- “Is the Government Watching Your Dealership?” *Spot Delivery*, September 2020
- “Department of Justice Settles Discrimination Claim Against Little Dealership: Why We Should Care,” *Spot Delivery*, August 2020
- “FTC Nails Bronx Honda and General Manager for Discrimination and Deception,” *Spot Delivery*, July 2020
- “The FTC, Auto Dealers, and Credit Discrimination: What’s Next?” *Spot Delivery*, July 2020.
- “Assessing Disparate Impact in the Davys of COVID-19,” *Spot Delivery*, June 2020
- “Fair Lending Developments in the Wake of *City of Miami*,” *The Business Lawyer*, Spring 2020
- ‘CFPB Taskforce on National Consumer Financial Law Issues RFI,’ Hudson Cook *Insights*, March 2020
- “Department of Justice Goes Undercover to Hunt for Auto Dealer Finance Discrimination,” *Spot Delivery*, November 2019
- “Massachusetts Dealers Overcome by Adverse Overtime Ruling,” *Spot Delivery*, September 2019.
- “Bar Association Auto Finance Resolution Withdrawn,” *Spot Delivery*, September 2019
- “Consumer Advocates Seek Bar Association Help to Combat Dealer Practices They Oppose,” *Spot Delivery*, August 2019
- “When is a Voluntary Protection Product Worthless?” *Spot Delivery*, June 2019

- “Fair Lending Developments: Wrestling with Causation,” *The Business Lawyer*, Spring 2019
- “Fixing Mistaken Repos,” *Spot Delivery*, May 2019
- “Massachusetts Dealers Overcome by Adverse Overtime Ruling,” *Spot Delivery*, September 2019
- “Bar Association Auto Finance Resolution Withdrawn,” *Spot Delivery*, September 2019
- “Consumer Advocates Seek Bar Association Help to Combat Dealer Practices They Oppose,” *Spot Delivery*, August 2019
- “When is a Voluntary Protection Product Worthless?” *Spot Delivery*, June 2019”
- Fair Lending Developments: Wrestling with Causation,” *The Business Lawyer*, Volume 74, Issue 2, Spring 2019
- “Fixing Mistaken Repos,” *Spot Delivery*, May 2019
- “*F&I Legal Desk Book: The Answer Book for Finance and Insurance Professionals*, with others, (Thomas B. Hudson, ed.) 8th, CounselorLibrary.com, LLC, 2018
- “Voluntary Protection Products – Don’t Fall Into the GAP,” *Spot Delivery*, December 2018
- “Voluntary Protection Product Refunds: The Buck Stops Where?” *Spot Delivery*, November 2018
- “Congress Kills Consumer Bureau Anti-Discrimination Guidance on Auto Finance,” *Business Law Today*, June 2018
- “Congress Kills Bureau Anti-Discrimination ‘Guidance’ – Now What?” *Spot Delivery*, June 2018
- “Fair Lending Developments: The End of an Era?” *The Business Lawyer*, Spring 2018
- “Auto Leasing to Servicemembers: The Department of Justice Pounces on Lessor,” *Spot Delivery*, March 2018
- “An End to Pushing the Envelope on Claims of Discrimination in Dealer Pricing?” *Spot Delivery*, January-February 2018
- “Are Your Spanish-Language Ads Creating Compliance Risk?” *Spot Delivery*, January-February 2018
- “The Fisher Memorial Program 2016: Is Fair Lending Fair for All?” *Quarterly Report*, 71, Nos. 1–2 (2017)
- *F&I Legal Desk Book: The Answer Book for Finance and Insurance Professionals*, with others, (Thomas B. Hudson, ed.) 7th, CounselorLibrary.com, LLC, 2017
- “Fair Lending Developments: Standing to Sue Takes the Floor,” *The Business Lawyer*, Spring 2017
- “Repossession Pitfalls Under the SCRA,” *Spot Delivery*, September 2016
- “Fair Lending Developments: Whither Disparate Impact,” *The Business Lawyer*, Spring 2016
- “Private Plaintiffs Are Hopping on the Disparate Impact Bandwagon,” *Spot Delivery*, April 2016
- “The Train Keeps on Rolling: Toyota Motor Credit Settles ECOA Charges for Dealer

Pricing,” *Spot Delivery*, March 2016

- “Congressional Staff Report Highlights Lengths to Which CFPB Will Go to Validate Its Claims,” *Spot Delivery*, January/February 2016
- “Appellate Court Affirms Car Dealer is ECOA “Creditor” and Must Give Adverse Action Notice,” *Spot Delivery*, October 2016
- “Congressional Staff Report Reveals Sad Inner Workings of CFPB Fair Lending Attack on Dealer Compensation,” *Spot Delivery*, December 2015
- “House Committee Expressed Impatience with CFPB on Disparate Impact,” *Spot Delivery*, November 2015
- “Another One Bites the Dust – Honda Finance Settles ECOA over Dealer Pricing Discretion,” *Spot Delivery*, August 2015
- “Honda Finance’s ECOA Settlement – What Does It Mean for Honda Dealers?” *Spot Delivery*, August 2015
- “Something for Everyone – The Supreme Court Rules on Disparate Impact,” *Spot Delivery*, July 2015
- “A Complicated Compromise: The Supreme Court Rules on Disparate Impact,” *Basis Points*, July 2015
- “CFPB Issues Flawed Examination Procedures,” *Spot Delivery*, July 2015
- “Industry Calls Out CFPB on Dealer Reserve Discrimination Methodology,” *Spot Delivery*, March 2015
- “Fair Lending Developments: A Continuation and a New Beginning,” *The Business Lawyer*, Spring 2015

Recognition and Accomplishments

- Ranked in Chambers USA 2020, Financial Services Regulation: Consumer Finance (Compliance)
- Founding Member, American College of Consumer Financial Services Lawyers