



Justin B. Hosie

May 30th, 2024

Professional Experience



Justin advises financial service providers on compliance with federal and state law. As a partner and Chair of Hudson Cook's Small Dollar and Alternative Financial Services Practice Group, he advises companies in fintech, lease-to-own, consumer lending, buy-now-pay-later, and earned wage access develop consumer disclosures and internal policies that comply with federal and state consumer protection laws.

Justin is committed to helping alternative financial service providers innovate while maintaining compliance with evolving regulatory requirements. Justin works with clients to:

- Guide new product development.
- Develop compliance management systems that align with federal and state consumer protection laws.
- Provide third-party compliance opinions and day-to-day compliance advice.
- Draft and review consumer disclosures for compliance with laws such as the Truth in Lending Act, Electronic Funds Transfer Act, Gramm-Leach-Bliley Act, the Restore Online Shoppers Confidence Act, Military Lending Act, Servicemembers Civil Relief Act, the E-SIGN Act, other federal laws, and state laws.

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

A frequent speaker on topics such as consumer financial regulations, the CFPB, innovation, and ethics, Justin co-presents Hudson Cook's monthly CFPB Bites webinar series. He is AV-rated by Martindale-Hubbell and recognized in The Best Lawyers in America® for Financial Services Regulation Law.

Justin was the first consumer financial services lawyer to use twitter to deliver content about emerging legal developments impacting consumer credit. He is a former founder and 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 Consumer Finance Committee's Pro Bono Subcommittee. He is a member of the Florida Bar, as well as the Tennessee, Chattanooga, and Federal Bar Associations. Among various publications, Justin co-authored the Annual Percentage Rates chapter of *The Law of Truth in Lending*, a treatise published by the American Bar Association.

As far as personal interests, in addition to spending quality time with his family, Justin is a lifelong hockey player, a long-suffering Buffalo Bills fan, a proud Kentucky Wildcat, and a Tottenham Hotspur enthusiast.

Practice Areas

FinTech

Payment Systems

Small Dollar Lending and Alternative Consumer Financial Services

Professional Affiliations & Certifications

- 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
- Former Vice Chair, American Bar Association’s Section of Business Law – Consumer Finance Committee, Young-Lawyers Sub-committee
- Member, Florida Bar
- Member, Tennessee Bar
- Member, Federal Bar Association

Speaking Engagements

- “Where the Consumer Financial Services Markets May be Headed in 2026: Some Legal and Compliance Considerations,” OLA Legal Issues Conference, February 2026
- “2025 Update on Small Dollar Lending and Rent-to-Own,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, November 2025
- “Shift to the States: Emerging Trends in Consumer Finance Enforcement,” INFIn MoneyTrends, October 2025
- “Legal Issues Lunch: Financial Services Compliance 2025 Legal and Regulatory Considerations,” Lend360, October 2025
- “Can’t Buy Me Love. But can you give me early access to my earned wages?” Hudson Cook Compliance Coffee Break, September 2025
- “A Changing Regulatory Landscape: Exploring New Terrain in Financial Services and Data Privacy,” American Fintech Council, August 2025
- “Protecting the Business,” APRO RTO World, August 2025
- “State of the Installment and Small Dollar Lending Industry for 2025 – Legal and Regulatory Considerations” OLA Legal Issues Conference, February 2025
- “Click-to-Cancel: A Brief Primer on FTC Rulemaking, CFPB Guidance and State Auto Renewal

Laws,” Hudson Cook Compliance Coffee Break, February 2025

- “Negative Option Contracts,” Hudson Cook Compliance Coffee Break, February 2025
- “The CFPB Payments Rule – It’s Time to Comply,” INFiN Webinar, December 2024
- “A Guide to Public Registries,” 2024 Financial Services Conference, November 2024
- “CFPB Rules: Navigating Proposed and Final Regulations,” National Automotive Finance Association, October 2024.
- “Exploring the Requirements of and Compliance with the CFPB’s Non-Bank Registries for Orders and Judgments, and Terms and Conditions,” INFiN MoneyTrends, October 2024
- “The Courts are Remaking the Legal Landscape for Financial Service Providers: Exploring Recent Supreme Court and Other Rulings and Their Impact on the Financial Services Industry,” INFiN MoneyTrends, October 2024
- “The CFPB’s Small-Dollar Rule: Compliance with the Payments Provisions,” INFiN MoneyTrends, October 2024
- “The Campaign Against Junk Fees, How Far Will it Go?,” INFiN MoneyTrends, October 2024.
- “Lessons from Federal Regulatory Actions,” APRO Protecting the Transaction Summit, August 2024
- “Bringing Compliance into Product Development,” OLA ComplianceU, June 2024
- “CFPB Registries,” INFiN Webinar, April 2024
- “CFPB Registries,” Compliance Coffee Break, March 2024
- “Associates and Marketing: A Brief Introduction,” Hudson Cook, February 2024
- “The CFPB Payments Rule: Is it Time to Comply?,” INFiN Webinar, January 2024
- “Negative Option Contracts,” Compliance Coffee Break, November 2023
- “Rent-to-Own, New Horizons in CFPB Authority,” Conference on Consumer Finance Law, October 2023
- “Alternative Financial Services Annual Update,” Financial Services Conference, October 2023
- “CFPB’s Proposed Registry of Terms & Conditions,” NAF Association’s Power 30 Webinar Series, October 2023
- “Emerging Products: Earned Wage Access, Buy Now Pay Later, Bank Partnerships, and More,” INFiN MoneyTrends, October 2023
- “Online Lending, Lead Generation, and Deceptive Design,” INFiN MoneyTrends, October 2023
- “Lessons Learned: Examinations, Enforcement Actions and Your CMS,” INFiN MoneyTrends, October 2023
- “CFPB Fee Frenzy,” NAFCU Regulatory Compliance & BSA Seminar,” September 2023
- “Insights and Strategies for Payments in Today’s Economy,” OLA ComplianceU, July 2023
- “Financial Services Law I,” AFSA Edge, June 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

Publications

- The Tortured Creditors Department: Decoding Alternative Financial Services Developments in 2024 *The Business Lawyer*, Spring 2025
- A Retrospective of the CFPB’s Activities Regarding Earned Wage Access, Quarterly Report – Conference on Consumer Finance Law, December 2024
- So Long, Farewell: Compliance Issues Facing Small-Dollar Lenders in 2023, *The Business Lawyer*, Spring 2024
- The Gathering Storm: Compliance Issues Facing Small-Dollar Lenders in 2022, *The Business Lawyer*, Spring 2023
- Stuck in a Time Loop: The Compliance Clock is Still Ticking for Small-Dollar Lenders in 2020, *The Business Lawyer*, Spring 2022
- “Tik Tok: The Compliance Clock Is Ticking for Small-Dollar Lenders in 2020,” *The Business Lawyer*; Vol. 76, Spring 2021
- “Earned Wage Access and the CFPB: A Path Toward Regulatory Acceptance?,” *Business Law Today*, March 2021
- “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
- “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
- “Small Dollar Lending Regulation in 2019,” *The Business Lawyer*; Vol. 75, Spring 2020
- “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
- “The Walking Dead: 2018 Small Dollar Lending Updates-Is the Small Dollar Loan Industry Mostly Dead or Slightly Alive?,” *The Business Lawyer*, Spring 2019
- “Choice-of-law clauses in online loans with consumers,” *Westlaw*, October 2018

- “Stranger Things: Small-Dollar Lending Updates and the Arrival of a Final Rule,” *The Business Lawyer*, Spring 2018
- “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
- “Death by a Thousand Cuts: Update on Small-Dollar Lending,” *The Business Lawyer*, Spring 2016

Recognition and Accomplishments

- The Best Lawyers in America[®] 2025 – Financial Services Regulation Law
- Martindale-Hubbell 2025 AV Preeminent[®] – Peer Rated for Highest Level of Professional Excellence