



Lucy Morris

May 30th, 2024

Professional Experience



Lucy helps financial institutions navigate complex regulatory challenges and government scrutiny. As Chair of the firm's Government Practice Group, she defends clients in investigations, examinations, and enforcement actions before federal and state agencies, including the Consumer Financial Protection Bureau, Federal Trade Commission, U.S. Department of Justice, and state attorneys general.

With decades of experience in consumer financial protection, Lucy works with clients to:

- Respond to government investigations, enforcement actions, and regulatory examinations.
- Develop compliance strategies to mitigate regulatory risk.
- Navigate complex consumer protection laws, including prohibitions against unfair, deceptive, or abusive acts or practices (UDAAP) and statutes related to credit cards, mortgage lending and servicing, payday lending, debt collection, and credit reporting.
- Defend clients and advocate before federal and state agencies on investigations, exams, and enforcement litigation.

Lucy brings a unique and experienced perspective to her practice, having served in senior leadership roles at the Consumer Financial Protection Bureau and Federal Trade Commission. From 2011 to 2014, she was a Deputy Enforcement Director at the CFPB, overseeing investigations and litigation related to consumer financial products and services. She was also a founding member of the CFPB Implementation Team, which established the agency following the passage of the Dodd-Frank Act.

Prior to the CFPB, Lucy spent over 20 years at the FTC in key leadership positions, including as Assistant Director for Financial Practices and Assistant to the Director of the Bureau of Consumer Protection. She led law enforcement investigations, consent negotiations, and litigation in financial services, marketing, and advertising. In recognition of her work, she received the FTC's highest honor, the Chairman's Award, in 2008.

Lucy is a Fellow of the American College of Consumer Financial Services Lawyers, an honor awarded to distinguished attorneys in the field. She frequently speaks on consumer financial services law at national programs hosted by the American Financial Services Association, Mortgage Bankers Association, Consumer Bankers Association, American Bar Association, and

Consumer Data Industry Association.

Lucy earned her law degree from UC Law San Francisco (formerly, UC Hastings) and began her career as a litigation associate at Betts, Patterson & Mines in Seattle.

Practice Areas

Federal Trade Commission

Government Oversight and Enforcement

State Enforcement

Professional Affiliations & Certifications

- Chair, American Bar Association, Section of Business Law, Consumer Financial Services Committee, Federal and State Trade Practices Subcommittee, 2015-2018
- Member, Washington State Bar Association and District of Columbia Bar Association
- Fellow, American College of Consumer Financial Services Lawyers
- Member, Conference on Consumer Finance Law

Speaking Engagements

- “Government Enforcement in a Shifting Political Landscape,” Financial Services Conference, Hudson Cook/Counselor Library, November 2024
- “Federal Enforcement and Litigation: Impacts on Auto Finance,” National Automotive Finance Association Workshop, October 2024
- “State and Federal Examination,” National Automotive Finance Association Workshop, October 2024
- CFPB Presentation, AFSA Operations Committee, AFSA Independents Conference, May 2024
- “So you just got a CID; now what?”, Compliance Coffee Break Webinar, Hudson Cook, February 2024
- “The CFPB’s Adolescent Years: Brash and Unrestrained,” Financial Services Conference, Hudson Cook/Counselor Library, October 2023
- CFPB Presentation, American Bankers Association Spring Meeting, April 2023
- CFPB Presentation, OLA Conference, April 2023
- “Please Hold Your Comments: A Deep Dive Into the CFPB’s Increased Issuance of Interpretive Rules and Policy Statements,” ABA Consumer Financial Services Committee Meeting, January 2023
- Government Enforcement Panel, Financial Services Conference, Hudson Cook/Counselor Library, November 2022
- “How Changes to CFPB Enforcement Strategies Impact Compliance Planning,” OLA

Compliance University, July 2022

- “What are the Expectations for Rohit Chopra’s CFPB,” OLA Executive Policy Summit, December 2021
- “The CFPB: Ten Years After,” INFiN MoneyTrends, November 2021
- “CFPB at 10 Years: A Look Back and a Look Ahead,” 2021 OLA Legal Issues Conference, July 2021
- “CFPB Bites of the Month: The CFPB’s 10-year Anniversary,” Hudson Cook Webinar, June 2021
- “Discussion on How Rohit Chopra’s Leadership Will Impact CFPB Regulatory Changes and the ARM Industry,” ACA International Weekly Huddle, February 2021
- “CFPB Taskforce on Federal Consumer Financial Law Report – What Does it Mean for You?” Hudson Cook Webinar, January 2021
- “Roundtable Discussions: Enforcement Trends & Outlook,” AFSA Annual Meeting & Independents Conference & Expo, October 2020
- “*Seila Law* and the Future of the CFPB,” Hudson Cook Webinar, July 2020
- “The CFPB’s Enforcement Agenda – Trends and Outlook,” Lend360 Online Lending Legal and Policy Issues Forum, February 2020
- “The CFPB Act’s Prohibition on ‘Abusive’ Acts & Practices: Should the CFPB Clarify Its Meaning and How Could Future CFPB and State AG Cases Shape Its Meaning?,” ABA Consumer Financial Services Committee Meeting, January 2020
- “Happy Anniversary?! Kraninger’s first year at the CFPB,” Hudson Cook webinar, December 2019, co-presented with Eric Johnson and Justin Hosie
- “Abusiveness in Practice,” [CFPB Symposium: Abusive Acts or Practices](#), June 2019
- “State of Play: The Shifting Federal and State Regulatory Landscape,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019
- “Merchant Cash Advance and Small Business Lending Session: Government Investigation and State and Federal Enforcement,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019
- “Recent Trends in State Attorneys General Enforcement Actions,” Mortgage Bankers Association Compliance Essentials Webinar, January 2019
- “Meet the Federal UDAAP Regulators,” ABA Business Law Section, September 2018
- “State & Local Regulators’ Roundtable,” Auto Finance Performance & Compliance Summit, May 2018
- “Practical Tips for Exam Preparation,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2018
- “Charting the CFPB’s Evolving Regulatory Authority and Best Practices for Engaging with its Supervisory and Enforcement Functions,” ABA Business Law Section, April 2018
- “CFPB: Past, Present, and Future,” U.S. Chamber of Commerce, March 2018

- [“State of \(Regulatory\) Play: How New Leadership at the CFPB is Changing Financial Regulation,”](#) Hudson Cook Webinar, February 2018
- “Conscience Uncoupling – the Bureau After Cordray,” AFSA Consumer Finance Compliance Symposium, January 2018
- [“2018 Predictions: Fair Lending in the Trump Era,”](#) Compli Webinar, January 2018
- [“Cordray Successor Confusion Placed a ‘Cloud’ Over the CFPB,”](#) Center for Auto Finance Excellence Podcast, December 2017
- “Reverse Engineering a Compliance Program from Consent Decrees, Enforcement Actions and More,” CRA and Fair Lending Colloquium, November 2017
- “Attorney General Enforcement Actions,” AFSA State Government Affairs Meeting, October 2017
- [“State AGs: Enforcement Beyond the CFPB,”](#) Hudson Cook Webinar, October 2017
- “CFPB Rulemaking and Enforcement,” AFSA Law Committee Meeting, May 2017
- “Individual and Executive Liability and Regulatory Reach,” MBA Legal Issues and Regulatory Compliance Conference, May 2017
- “When the Government Comes Calling,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2017
- “The Federal Trade Commission Under the Trump Administration: Past, Present, and Future,” Hudson Cook Webinar, February 2017
- “The Real Impact of the DC Circuit’s Decision in *PHH v. CFPB*,” ABA Section of Antitrust Law, December 2016
- “Compliance Checklist for CFPB Examinations,” ACI’s Forum on Mortgage Servicing Compliance, December 2016
- “Navigating the CFPB’s Exam and Enforcement Process,” FiSCA Annual Conference, October 2016
- “Planning for CFPB Exams,” MBA Regulatory Compliance Conference, September 2016
- “Litigation – Addressing Enforcement Actions,” MBA Legal Issues and Regulatory Compliance Conference, May 2016
- “PHH Litigation and the CFPB Enforcement Process,” ACI’s National Forum on Residential Mortgage Litigation & Regulatory Enforcement, April 2016
- “CFPB GPS: What Directs the Bureau and Where it’s Going?” CBA Live 2016, March 2016
- “Remedies and Fines in Government Enforcement Actions,” ABA Business Law Section, January 2016
- Keynote Speaker, Capital One Specialty Finance Lender Group Event, November 2015
- “CFPB Administrative Appeals,” Conference on Consumer Finance Law, November 2015
- “Review of the CFPB’s Consumer Complaint Database,” ABA Business Law Section, September 2015
- “Regulatory Update,” CoreLogic Risk Summit, Credit Client Counsel, July 2015

- “Adapting to ‘UDAAP’: Avoiding Trouble With Government Enforcers,” Consumer Financial Services Conference, June 2015
- “Federal Regulatory Developments,” National Automotive Finance Association Conference, May 2015
- “The CFPB’s Far Reaching Impact,” ACI Conference, Residential Mortgage Litigation & Regulatory Enforcement, April 2015
- “CFPB, OCC and CCIA Member Products: Future Predictions,” CCIA Annual Meeting, April 2015
- “The Latest in Unfair and Deceptive Practices,” ABA Business Law Section, April 2015
- “Management and Oversight of Service Providers,” CDIA Teleseminar, March 2015
- “The Countdown to the CFPB Payday Lending Rulemaking,” CFSA Annual Meeting, March 2015
- “Securitization Market,” AFSA Law Committee Meeting, January 2015
- “Service Provider and Vendor Management Compliance Issues in Light of Recent CFPB and FTC Actions,” ABA Business Law Section, January 2015

Publications

- “Expect to Feel Aftershocks of Chopra’s CFPB Shake-Up,” *Law360*, February 2025, co-authored with Robert Tilley.
- “[CFPB Fines National Bank \\$37.5 Million for Misappropriating Customer Data to Open Unauthorized Accounts](#),” Hudson Cook *Enforcement Alert*, July 2022, co-authored with Erik Kosa
- “[CFPB Sues Payday Lender for Allegedly Concealing Free Repayment Plans and Withdrawing Borrowers’ Funds without Authorization](#),” Hudson Cook *Enforcement Alert*, July 2022, co-authored with Kristen Yarows
- “[Two CFPB Announcements Bolster Parallel State Enforcement Efforts](#),” *Law360*, June 2022, co-authored with Robert Tilley
- “[CFPB Orders Debt-Relief Payment Processors to Pay More Than \\$11 Million and Imposes Industry Bans](#),” Hudson Cook *Enforcement Alert*, May 2022, co-authored with Erik Kosa
- “[CFPB Fines Very Large Bank \\$10 Million for Allegedly Unlawful Garnishments](#),” Hudson Cook *Enforcement Alert*, May 2022, co-authored with Francis Conlon
- “[CFPB Obtains Bans Against Student-Loan Debt Relief Companies and CEO](#),” Hudson Cook *Enforcement Alert*, April 2022, co-authored with Michael Essiaw
- “[CFPB Flexes Supervisory Authority Over Nonbanks](#),” Hudson Cook *Enforcement Alert*, April 2022, co-authored with Kristen Yarows
- “[CFPB Files Lawsuit Against Nationwide Credit Reporting Agency and Senior Executive for Allegedly Violating 2017 Order](#),” Hudson Cook *Enforcement Alert*, April 2022, co-authored with Kristen Yarows

- [“FTC Announces Settlement with Multistate Auto Dealership and General Manager Over Alleged Unauthorized Charges for Optional Products and Discrimination Against Black Applicants,”](#) Hudson Cook *Enforcement Alert*, April 2022, co-authored with Gabriela Chambi
- [“CFPB Announces Consent Order with Student-Loan Servicer Over Alleged Misrepresentations to Borrowers Concerning Eligibility for Public Service Loan Forgiveness,”](#) Hudson Cook *Enforcement Alert*, March 2022, co-authored with Robert Tilley
- [“CFPB Continues Aggressive Focus on Student Lending,”](#) Hudson Cook *Insights*, January 2022, co-authored with Kristen Yarows
- [“CFPB Bites of the Month – Q&A with Lucy Morris: Takeaways from 10 Years,”](#) Hudson Cook *Insights*, June 2021
- [“Unfair, Deceptive, and Abusive Acts or Practices – Deception,”](#) *Consumer Finance Law: Understanding Consumer Financial Services Regulations*, American Bar Association, Business Law Section, February 2021, co-authored with Erik Kosa
- [“FTC Commissioner Rohit Chopra to be Named CFPB Director,”](#) Hudson Cook *Insights*, January 2021
- [“Discovering a Limit to Power: A Statute of Limitations Applied to the CFPB,”](#) *Business Law Today*, October 2020
- [“CFPB, FTC Open for Business,”](#) Hudson Cook *Insights*, March 2020
- [“Kraninger as CFPB Sheriff and the Potential Impact of the 2020 Presidential Election,”](#) Hudson Cook *Insights*, September 2019
- [Opening Statement](#), CFPB Symposium: Abusive Acts or Practices, June 2019
- [“The CFPB’s Eventful Year: Key Developments Before and After Rich Cordray’s Resignation,”](#) American Bar Association, Section of Business Law, *Consumer Financial Services Committee Newsletter*, August 2018
- [“FTC in Full Force: What to Expect From New Leadership,”](#) *Law360*, June 2018
- [“Rich Cordray’s Legacy and the Future of the CFPB,”](#) various publications, November 2017
- [“A Chat With FTC’s Thomas Pahl,”](#) *Law360*, July 2017
- [“CFPB Faces Increasing Challenges to Its Authority to Investigate Violations of Consumer Financial Laws,”](#) *Bloomberg BNA Banking Daily*, May 2017
- [“CFPB Dealt Major Setback in How Far Back it Can Pursue UDAAP Claims,”](#) *Bloomberg BNA Banking Daily*, October 2016
- [“BNA INSIGHT: Now It’s Real – No Statute of Limitations for CFPB UDAAP Claims,”](#) *Bloomberg BNA Banking Daily*, May 2016
- [“BNA INSIGHT: How Far Back Can the CFPB Go in Pursuing UDAAP Claims?”](#) *Bloomberg BNA Banking Daily*, January 2016
- [“CFPB and FTC Take Different Approaches in Mobile Cramming Cases,”](#) *Business Law Today*, June 2015

