



Michael A. Goodman

May 30th, 2024

Professional Experience



With a deep understanding of federal and state consumer protection laws developed over 20 years at Hudson Cook, Michael helps businesses navigate complex regulatory requirements with confidence. As a partner in our Washington, DC office, he advises clients on compliance with laws and regulations enforced by multiple federal agencies including the Consumer Financial Protection Bureau (CFPB), the Federal Trade Commission (FTC), and the Federal Communications Commission (FCC).

Michael's clients are interested in marketing their products and services to consumers and servicing customer relationships in compliance with applicable law. They come to Michael for practical, thoughtful guidance on navigating federal and state standards regulating telemarketing, text message marketing, email marketing, online advertising, direct mail, and other types of consumer contact. Clients include mortgage lenders, debt settlement firms, lead generators, auto finance companies, and personal loan companies.

Michael's primary focus is working with clients to:

- Implement successful business strategies that incorporate compliance with federal and state laws and regulations addressing marketing, communicating with consumers, and data privacy. This includes identifying and reconciling inconsistent federal and state standards and standards that vary from state to state.
- Develop compliance strategies for debt settlement companies, retailers, lenders, mortgage bankers, auto finance companies, marketers, entrepreneurs, and lead generators. Many of Michael's clients must accommodate general standards that apply to everyone as well as industry-specific requirements and prohibitions. This requires thoughtful conversations with clients, lawyers and non-lawyers alike, and exceptional listening skills.
- Represent businesses in CFPB, FTC, and FCC investigations and enforcement actions.
- Advise on the proper collection, use, and disclosure of consumer information.

Before joining Hudson Cook, Michael worked as a staff attorney in the FTC's Bureau of Consumer Protection, where he played a key role in developing amendments to the Telemarketing Sales Rule and managing the initial rounds of rulemaking under the CAN-SPAM Act. He also litigated consumer protection cases involving fraud and deceptive marketing and spoke nationwide on FTC

enforcement and compliance. Having experience working as a federal regulator as well as many years in private practice give Michael an unusually broad perspective that his clients appreciate. When it comes to marketing compliance, answers are rarely black and white. Being able to see things from the regulator's point of view helps clients assess risk and make informed decisions.

Michael believes that listening is an underrated skill for outside counsel. Typically, Michael's client engagements begin with a conversation about the client's business, the client's vision for success, and how the client can turn that vision into reality with a compliant marketing plan. Michael takes pride in his ability to explain complicated legal issues in ways everyone throughout the client's organization can understand.

Federal marketing standards are known for their disproportionately severe penalties compared to the conduct they regulate. Companies who do not emphasize compliance with these standards can face substantial threats that could have been avoided with experienced guidance during the planning process. Clients who consult Michael early find that they are often able put their marketing ideas into action with minimal disruption.

Michael is dedicated to helping businesses develop compliance strategies that align with regulatory expectations while supporting growth and innovation.

When Michael is not practicing law at Hudson Cook, he has enjoyed hosting several Grateful Dead nights at BabyCat, his local brewery in Kensington, Maryland. He is hoping to be invited back soon for another installment.

Practice Areas

Credit Reporting, Privacy and Data Security

Government Oversight and Enforcement

Professional Affiliations & Certifications

- Member, Virginia State Bar
- Member, American Bar Association
- Former Chair, Federal and State Trade Practices Subcommittee, Consumer Financial Services Committee, Section of Business Law, American Bar Association, 2009-2012

Speaking Engagements

- Debt Settlement Insights Roundtable, Debt Connection Symposium, October 2024
- Compliance Hot Topics Panel, CDRI/EDGE Conference, August 2024
- "Is Your Call Center Compliant?", OLA Compliance University, July 2022
- "Using the Reassigned Number Database. How is it going?", AccountsRecovery Webinar, December 2021
- "Are Your Advertising and Marketing Practices Putting You at Risk for a UDAAP Violation?,"

OLA Compliance University, May 2021

- “The *Facebook, Inc. v. Duguid* Supreme Court decision – What it means for TCPA private actions and companies using automated equipment for calls and texts, Hudson Cook Compliance Coffee Break,” May 2021
- “The Telephone Consumer Protection Act: What You Don’t Know About Contacting Your Customers Can Hurt You,” FiSCA MoneyTrends 2019, October 2019
- “There’s a New Sheriff at the CFPB,” 2019 Risk & Compliance Summit, March 2019
- “TCPA & GDPR Panel,” Carpliance 2019, February 2019
- “Consumer Protection Update,” American Bar Association Antitrust Section Webinar, January 2019
- “UDAAP Basics: Learning to See Your Advertising Through a Regulator’s Eyes,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2018

Publications

- [“FCC’s New Robocall One-to-One Consent Standard Postponed by FCC and Vacated by Court on Eve of Effective Date,”](#) *Spot Delivery*, January/February 2025
- [“FTC Expands Creative Use of Gramm-Leach-Bliley Act to Recover Consumer Redress from Defendants,”](#) *Spot Delivery*, August 2024
- [“CFPB Warns Against Including Unenforceable Terms in Contracts,”](#) *Spot Delivery*, July 2024
- [“FTC Settlement Offers Plenty to Think About Regarding “Up To” Advertising Claims,”](#) Hudson Cook *Insights*, June/July 2024
- [“FTC Announces Telemarketing Sales Rule Amendments Related to Recordkeeping and B2B Telemarketing and Signals Possible Additional Changes,”](#) *Spot Delivery*, May 2024
- [“Should You Care About a Canadian Court’s Ruling Against a Canadian Airline? Absolutely!”](#) *Spot Delivery*, April 2024
- [“FCC Continues to Roll Out TCPA Changes and Interpretations,”](#) *Spot Delivery*, March 2024
- [“FTC Announces Telemarketing Sales Rule Amendment Regulating B2B Telemarketing,”](#) Hudson Cook *Insights*, March 2024
- [“FTC TurboTax Initial Order Offers Key Advertising Compliance Lessons,”](#) *Spot Delivery*, October 2023
- [“FTC TurboTax Initial Order Offers Key Advertising Compliance Lessons,”](#) *Spot Delivery*, August 2023
- [“CFPB Fines Large National Bank for Withholding Credit Card Rewards, Charging Multiple Non-sufficient Fund Fees, and Opening Unauthorized Accounts,”](#) Hudson Cook *Insights*, July 2023
- [“FTC Announces Extended Vehicle Warranty Settlement that Includes Conduct Bans and Monetary Relief,”](#) *Spot Delivery*, May 2023
- [“CFPB Fines National Bank \\$9 Million for Improper Handling of Credit Card Billing Error](#)

Notices and Claims of Unauthorized Use,” Hudson Cook *Insights*, May 2023

- “[FCC Acting on Multiple Fronts to Maintain TCPA’s Relevance](#),” Spot Delivery, January/February 2023
- “CFPB Charges Payment Processor with Using ‘Dark Patterns’ to Enroll Consumers into Auto-Renewal Plans,” Hudson Cook *Insights*, October 2022
- “CFPB Fines Large National Bank \$100 Million For Failing to Properly Disburse State Unemployment Benefits During the Height of Pandemic,” Hudson Cook Enforcement Alert, July 2022, co-authored with Michael Essiaw
- “CFPB offers more federal UDAAP guidance on consumer reviews,” *SubPrime Auto Finance News*, June 2022
- “CFPB Announces Enforcement Action Against the Owner of a Student-Loan Debt Relief Company over Alleged Unauthorized Charges and Withdrawals from Student Borrower Bank Accounts,” Hudson Cook *Enforcement Alert*, June 2022, co-authored with Gabriela Chambi
- “New FTC Guidance on Posting Customer Reviews Online Includes Surprising Dos and Don’ts,” Hudson Cook *Insights*, January 2022
- “FTC Puts Businesses on Notice (Again) About Fake Reviews and Other Misleading Endorsements,” Hudson Cook *Insights*, November 2021
- “The FCC’s Reassigned Number Database Nears Its Debut,” American Bar Association’s *Business Law Today*,” November 2021
- “Looking Forward After the U.S. Supreme Court Adopts Narrow, Business-Friendly TCPA ‘Autodialer’ Standard,” Hudson Cook *Insights*, April 2021
- “U.S. Supreme Court Hears Oral Argument in the TCPA ‘Autodialer’ Case,” American Bar Association Business Law Section’s *Business Law Today*, January 2021
- “U.S. Supreme Court to Address Major TCPA Issue Next Term, Resolving Circuit Split on Autodialer Standard,” Hudson Cook *Insights*, July 2020
- “Courts Contemplate Companies’ Ability to Restrict Means of Revoking TCPA Consent,” Hudson Cook *Insights*, April 2019
- “Ninth Circuit Adds Its Two Cents to Piggy Bank of TCPA Autodialer Interpretations,” Hudson Cook *Insights*, October 2018
- “‘Direct Drop’ Voicemail Service Subject to TCPA,” Hudson Cook *Insights*, August 2018
- “Seventh Circuit Reinstates Data Breach Lawsuit Against Barnes & Noble,” Hudson Cook *Insights*, May 2018, co-authored with Kavitha J. Subramanian
- “Exploring the Standing Challenge in Data Breach Litigation,” Hudson Cook *Insights*, March 2018, co-authored with Kavitha J. Subramanian
- “The TCPA Can Make Good Things Go Bad,” Hudson Cook *Insights*, February 2018
- “When Texting Customers, Use Caution When Taking the Auto Route,” Hudson Cook *Insights*, October 2017

