



Rebecca E. Kuehn

May 30th, 2024

Professional Experience



With nearly three decades shaping the landscape of consumer data compliance, Becki Kuehn guides businesses through the complex intersection of credit reporting, privacy, and regulatory risk. She advises organizations that rely on consumer data for analytics and decisioning, ensuring compliance with the Fair Credit Reporting Act (FCRA), financial and consumer privacy laws, fair lending, and other federal and state regulations. As a partner in our Washington, DC office and chair of the firm's Credit Reporting, Privacy, and Data Security Practice Group, Becki leads a nationally recognized team whose experience spans regulatory agencies, in-house counsel roles, and private practice. This breadth of perspective enables the team to help clients navigate consumer financial laws and prohibitions against unfair, deceptive, or abusive trade practices with unmatched insight. A seasoned advocate, Becki represents clients in high-stakes investigations and proceedings before federal and state agencies, including the Federal Trade Commission (FTC) and Consumer Financial Protection Bureau (CFPB).

Together with this multidisciplinary team, Becki helps clients:

- Leverage deep regulatory and industry experience to ensure compliance with federal consumer protection laws, including FCRA and the Gramm-Leach-Bliley Act (GLBA).
- Implement enterprise-level strategies for risk mitigation and best practices in credit reporting and consumer data management.
- Navigate complex FTC and CFPB investigations and enforcement actions with the support of professionals who have served inside agencies and corporate legal departments.
- Develop robust privacy and data security frameworks that align with evolving regulatory expectations and industry standards.

A frequent speaker and trusted voice on consumer reporting and financial privacy, Becki has testified before Congress and state legislatures. Becki has testified before the U.S. House Committee on Financial Services, Subcommittee on Financial Institutions, on CFPB reform and financial data privacy, and before the U.S. House Committee on Financial Services, Subcommittee on Oversight & Investigations, on behalf of the Consumer Data Industry Association, on consumer reporting accuracy and compliance. Becki also testified on proposed legislation affecting consumer reporting agencies before the Maryland House Economic Matters Committee.

Before joining Hudson Cook, Becki was Vice President and Senior Regulatory Counsel for

CoreLogic, where she advised management on credit reporting and consumer data regulations. Prior to that, she served as Assistant Director in the FTC’s Division of Privacy and Identity Protection, leading the agency’s FCRA program and overseeing enforcement, outreach, and rulemaking in consumer privacy, credit reporting, identity theft, and information security. In this role, she also provided technical assistance to international financial regulators, including the World Bank and USAID.

Becki’s private practice experience includes partnerships at LeClair Ryan and Reed Smith, LLP, where she represented financial service providers in litigation and compliance matters involving the FCRA, Truth in Lending Act (TILA), and Fair Debt Collection Practices Act (FDCPA).

Becki is a Fellow of the American College of Consumer Financial Services Lawyers and an active leader in the American Bar Association’s Consumer Financial Services and Litigation Sections. She is a co-chair of the ABA’s Section of Litigation Woman Advocate Committee, and has served as Chair and Faculty of the National Institute for Consumer Financial Services Basics. She is admitted to practice in Virginia, Maryland, and the District of Columbia.

Practice Areas

Credit Reporting, Privacy and Data Security

Government Oversight and Enforcement

Litigation

Residential Property Management

Professional Affiliations & Certifications

- Fellow, American College of Consumer Financial Services Lawyers
- Co-Chair, American Bar Association, Section of Litigation, Woman Advocate Committee
- Faculty, National Institute for Consumer Financial Services Basics, American Bar Association, Section of Business, Consumer Financial Services Committee, 2013 – Present
- Chair, 2016 National Institute for Consumer Financial Services Basics, American Bar Association, Section of Business, Consumer Financial Services Committee
- Observer, Criminal Records Accuracy Committee, Uniform Law Commission, 2015 – 2018

Speaking Engagements

- “Navigating the Minefield: What Credit Report Users and Furnishers Need to Know Now,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, November 2025
- “The Future of FCRA Enforcement,” CCFL, November 2025
- “Behind the Screens: Securing Data in the Background Screening Industry,” and “Are You Ready for It? A Swift Start to Tenant Screening Compliance,” PBSA Annual Conference,

October 2025

- “The New Regulatory Frontier: how the future of credit reporting will be impacted by regulation of AI & data,” World Consumer Credit Reporting Conference, October 2025
- “Trigger Warnings: Mortgage Triggers and Resellers,” NCRA Webinar, July 2025
- “Recent Developments in the FCRA,” CCFL Annual Consumer Finance Law Conference, May 2025
- “Consumer Reporting Litigation & Enforcement: Key Risks & Trends in 2025,” CDIA Connect, May 2025
- “The Evolution of Consumer Data: A Woman’s Perspective,” CDIA Connect, May 2025
- “New Year, New Rules? Fraud Products and the FCRA,” Auto Intel Summit, April 2025
- “Who’s Afraid of Little Old State Law: Strategies for Managing Your State Law Compliance,” and “The New Era of FCRA: Understanding the CFPB’s Proposed Rulemaking and its Implications on Screeners,” Professional Background Screening Association Mid-Year Conference, March 2025
- “Regulatory Update on the Fair Credit Reporting Act,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, November 2024
- “CFPB Rules: Navigating Proposed and Final Regulations,” NAF Compliance Workshop, October 2024
- “Tortured Rules Department: The latest on the CFPB’s FCRA rule,” PBSA Annual Conference, September 2024
- “Steering Clear of Compliance Pitfalls,” Nova Cashflow Underwriting Summit, September 2024
- “The CFPB’s FCRA Rulemaking, What It May Mean, and Whether It Will Survive,” CCFL Annual Consumer Financial Services Conference, May 2024
- “CFPB Issues Two New FCRA Advisory Opinions” – A CDIA Webinar, February 2024
- “CDIA Webinar on FTC Amendment to Safeguards Rule,” November 2023
- “Breaking Down the CFPB’s New Rulemaking,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, October 2023
- “What’s Happening in Washington,” Experian Vision Conference, May 2023
- “Compliant Originations and Customer Management: Regulatory Speed Dating for Business Leaders,” FICO World, May 2023
- “The Post-Pandemic Consumer Financial Protection Landscape,” ABA Antitrust Section Consumer Protection & Data Privacy Conference, February 2023
- “Keeping on the Right Side of Fair Lending,” OLA Compliance University, July 2022
- “Driving Change: Litigation & Enforcement Developments in the Consumer Reporting Industry,” CDIA Virtual Law & Industry Conference, June 2022
- “Removing Bias in Lending for a More Equitable Financial System,” LendIt Fintech USA 2022, May 2022
- “Getting a Clearer Picture or Merely a Caricature? The Use of Alternative Data and Artificial

- Intelligence in Credit Decisions, Servicing and Collection,” CCFL Annual Consumer Financial Services Conference, May 2022
- “Fair Lending Tune-Up,” FICO World 2022, May 2022
 - “Tracking New Debt Collection Regulations and Policy: Opportunities in Loss Prevention,” FICO World 2022, May 2022
 - “Tenant and Employment Screening Under the FCRA,” PBSA Webinar, April 2022
 - “Big Changes in Reporting Medical Collections Debt: A CDIA Webinar exploring what happened, what’s next and why it matters,” CDIA Webinar, April 2022
 - “From the Hill: the regulatory landscape in motion,” Experian Vision 2022, April 2022
 - “The War on Tenant Screening: How Regulatory and Legislative Changes in Washington Are Impacting the Industry,” PBSA 2022 Mid-Year Legislative and Regulatory Conference, April 2022
 - “Fast and Furious with the FCRA: Fifty Minutes on the Latest Developments in FCRA Litigation,” ABA Litigation Section, Consumer Litigation Committee, The Woman Advocate Committee Webinar, April 2022
 - “The CFPB’s View of Credit Reporting,” CDIA Webinar, March 2022
 - “A Holistic View of Red Flags,” Hudson Cook Compliance Coffee Break, March 2022
 - “Mingling with Membership: Data Privacy and Security: Lessons Learned from FTC Developments,” North Carolina Bar Association Webinar, February 2022
 - “FTC Expands Safeguards Rule to Address Cybersecurity Risks & Privacy,” CDIA Webinar, December 2021
 - “Regulatory Changes Pave the Way for a New Era of Consumer Protection,” CDIA Webinar, November 2021
 - “What to Expect in Supervisory Examinations in the Biden Administration,” INFiN MoneyTrends, November 2021
 - “Credit Reporting,” ABA Consumer Financial Services Basics Virtual Conference, October 2021
 - “Stretching Your Outside Counsel Dollar: Strategies for Maximizing Your Legal Budget,” Professional Background Screening Association Annual Conference, September 2021
 - “Rise of the Machines: Using AI and Other Data Analytics to Improve Compliance and Deliver Better Products,” Professional Background Screening Association Annual Conference, September 2021
 - “Litigation & Enforcement Trends: What will we see in 2021,” CDIA 2021 Virtual Law & Industry Conference, July 2021
 - “Consumer Protection Gotchas for Lenders and MSBs: Privacy, Safeguards, Red Flags and the ADA,” INFiN Webinar, July 2021
 - “Supreme Court Decision: *TransUnion v. Ramirez*,” CDIA Webinar, June 2021
 - “Employment/Income/Asset Verification: New Trends in Underwriting,” 2021 Virtual Financial

Services Conference, May 2021

- “VCDPA – The newest consumer data privacy law comes to Virginia,” Hudson Cook Compliance Coffee Break, April 2021
- “Compliance Priorities for Tenant Screeners to Reduce Regulatory and Litigation Risk,” Professional Background Screening Association Virtual 2021 Mid-Year Legislative & Regulatory Conference, April 2021
- “FCRA Litigation: A Review of Top Issues from 2020 and What to Expect in 2021,” ABA Consumer Litigation Committee Virtual Roundtable, February 2021
- “The Changing Dynamics of Litigation & Enforcement,” CDIA Webinar Rebroadcast, December 2020
- “The Changing Dynamics of Litigation & Enforcement,” CDIA 2020 Virtual Law & Industry Conference, September 2020
- “FCRA Basics for Screeners – Distance Learning Style,” Professional Background Screening Association Virtual Conference, September 2020
- “FTC to Ramp Up the GLBA Safeguards Rule,” CDIA Webinar, August 2020
- “CFPB Director Kraninger To Address Credit Reporting Industry – A CDIA Teleseminar with comments on the impact of the CARES Act on the compliance ecosystem,” CDIA Webinar, June 2020
- “Fair Lending Fundamentals in Today’s Information-based World,” NAFCU Webinar, May 2020
- “Consumer Protection Considerations for Small Dollar Lenders During Covid-19,” Hudson Cook webinar, April 2020
- “COVID-19 in the Screening Industry Q&A Part I,” Professional Background Screening Association Webinar, April 2020
- “The CARES Act: Modifications to Data Furnishers’ FCRA Obligations,” CDIA Webinar, April 2020
- “Conducting Internal Investigations Post-Connolly,” ABA 2020 Corporate Counsel CLE Seminar, February 2020
- CDIA Briefing on CFPB/FTC Workshop on Accuracy in Credit Reporting Webinar, CDIA, December 2019
- “Data Management for Business Operations,” AFSA Annual Meeting, October 2019
- “Compliance Speedsmarts: Technology,” AFSA Annual Meeting, October 2019
- “Navigating the Challenges in Today’s Litigation and Enforcement Environment,” Consumer Data Industry Association webinar, October 2019
- “Credit Reports,” ABA Business Law Section 10th Annual National Institute on Consumer Financial Basics, October 2019
- “Lessons for Tenant Screeners from the Front Lines,” Professional Background Screening Association, September 2019
- “Getting Prepared for Data Privacy in Debt Collections,” Automotive Intelligence Summit, July

2019

- “Data Privacy meet Regulatory Oversight in Debt Collection,” Automotive Intelligence Summit, July 2019
- “Examining the Hottest Claims of 2019 Under the FCRA and ECOA,” ACI Consumer Finance: Class Actions, Litigation & Government Enforcement Actions, July 2019
- “Managing Risk in an Always-Changing Litigation & Enforcement Environment,” CDIA Law & Industry Conference, June 2019
- “A New Way to (Really) Know Your Customers: Consumer-Permissioned Access to Financial Accounts,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019
- “Privacy in the New World: Post-GDPR State Law Privacy Developments in the United States,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2019
- “Trends in Fraud, and How to Avoid It,” CBA Live 2019, April 2019
- “Consumer Protection Update,” American Bar Association Antitrust Section Webinar, January 2019
- “Privacy in the New World: Post-GDPR State Law Privacy Developments,” FiSCA Annual Conference & Expo, October 2018
- “You’ve Got Questions – They’ve Got Answers,” National Association of Professional Background Screeners Annual Conference, October 2018
- “Island of Misfit Toys: How Does the FCRA Apply to FINRA Onboarding, and Other ‘Not Quite Employment’ Circumstances (If at All)?”, National Association of Professional Background Screeners Annual Conference, October 2018
- “Fair Credit Reporting Act: An Overview,” American Bar Association National Institute on Consumer Financial Services Basics, October 2018
- “State and Local Law Developments in Residential Screening,” National Consumer Reporting Association Conference, November 2017
- “A Conversation with the Federal Trade Commission, and Don’t Let Your Audit Reports Become ‘Exhibit A’ in Court: The Do’s and Don’ts of Conducting Audits to Manage Compliance and Litigation Risk,” National Association of Professional Background Screeners Annual Conference, September 2017
- “Regulatory Update Panel,” TransUnion Financial Services Summit, May 2017
- “Notices, Notices, Notices: A Comprehensive Look at Adverse Action, Risk-based Pricing, and Credit Score Notices for Credit and Non-Credit Transactions,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2017
- “Data Sharing: Making Sense of the Rules Around Affiliate and Non-Affiliate Sharing,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2017
- “The Promise and Pitfalls of New Data Sources and Scoring Models,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2017

- “Government Investigations, Examination, and Enforcement,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2017
- “Vendor Liability and Management: Managing Risk for Third Parties in the Financial Services Context,” ACI Consumer Finance Class Action and Litigation Conference, April 2017
- “Transforming Your Business: New Products and Customer Acquisition Tools,” Consumer Financial Services Association Conference, February 2017
- “Tenant Screening Basics,” National Association of Professional Background Screeners Annual Conference, September 2016
- “Class Actions After *Spokeo, Inc. v. Robins*,” ABA Section of Business Law Annual Meeting, September 2016
- “Privacy Law Developments – Emerging Data Trends, Privacy Law Developments – Employment, Privacy Law Update,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2016
- “Fair Credit Reporting Act – Changing Landscape,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, April 2016
- “The Automobile as the Ultimate Mobility Device – Autonomous, Connected, Electric Shared,” FICO World 2016 Conference, April 2016
- “Simplified Compliance Management for Screening Companies,” National Association of Professional Background Screeners Annual Conference, September. 2015
- “Fair Credit Reporting Act: Litigation, Regulatory and Enforcement Developments in the Financial Services Industry and Beyond,” Stafford Conferences Webinar, June 2015

Publications

- “Don’t Cross the Double Lines: CFPB Reminds Credit Report Users to Have Permissible Purpose Before Obtaining Credit Reports,” Spot Delivery, August 2022
- “Lessons Learned from Dun & Bradstreet,” Hudson Cook *Insights*, February 2022, co-authored with Meg Nicholls
- “FCRA Year in Review: Key FCRA Appellate Decisions,” ABA Consumer Litigation, Summer 2021, co-authored with David Anthony
- “FTC Brings First Enforcement Action Alleging Failure to Provide Documentation of Identity Theft to Victims,” Hudson Cook *Insights*, June 2020, co-authored with Cierra Newman
- “Springing Consumer Rights: Responding to the Federal Government Shutdown and Anticipating Another,” Hudson Cook *Insights*, March 2019, co-authored with Webb McArthur
- “Dead Men Violate No Injunctions,” Hudson Cook *Insights*, October 2018, co-authored with Nora R. Udell
- “The Myth of Fingerprints: The Privacy Pitfalls of Biometric Data,” Hudson Cook *Insights*, July 2018
- “New York Court of Appeals to Consider Scope of Law Prohibiting Discrimination Based on a

Criminal Conviction,” Hudson Cook *Insights*, January 2017, co-authored with Latif Zaman

Recognition and Accomplishments

- *The Best Lawyers in America*©2025 – Banking and Finance Law
- Fellow, American College of Consumer Financial Services Lawyers