



Robert D. Tilley

May 30th, 2024

Professional Experience



Rob represents consumer financial services companies in government investigations, enforcement actions, and consumer disputes. As a partner in our Washington, DC office, he regularly represents clients before the Consumer Financial Protection Bureau (CFPB), Federal Trade Commission (FTC), U.S. Department of Justice (DOJ), and state attorneys general. He also has significant experience litigating cases in state and federal courts and representing clients in arbitration proceedings across the country.

Clients rely on Rob to resolve high-stakes legal proceedings and regulatory matters, including claims that challenge the viability of the company's business model, novel applications of federal and state law, and the interaction between regulatory investigations and civil litigation. Rob's clients appreciate his clear analysis of complex regulatory issues and direct advice in the face of uncertainty.

Rob was recognized on the *Best Lawyers: Ones to Watch* list in 2023 and 2024. He also speaks and writes regularly on emerging issues in the financial services sector, and he co-hosts Hudson Cook's Litigation Lessons quarterly [webinar](#).

Before joining Hudson Cook, Rob spent more than a decade representing clients in litigation and white-collar investigations at two prominent law firms.

Practice Areas

Government Oversight and Enforcement

Litigation

Credit Reporting, Privacy and Data Security

Representative Matters

Arbitration

- Obtained arbitration award following multi-day arbitration on behalf of auto finance company in

consumer dispute

- Prevailed on summary judgment motions on behalf of auto finance company in multiple consumer disputes

Federal Investigations and Enforcement Actions

- Represent a consumer leasing company in connection with investigation by the FTC
- Secured a no-action letter from the CFPB after multi-year investigation of a money-transfer company concerning potential claims under CFPA, EFTA, and GLBA
- Secured a no-action letter from the CFPB after multi-year investigation of a mortgage lender concerning appraisal bias
- Secured closure with no action on behalf of a background screening company after a multi-year, joint investigation by the CFPB and FTC relating to potential FCRA claims

Litigation

- Represent companies in mass action litigation concerning claims under New Jersey's Daniel's Law
- Represented a consumer finance company in putative class action litigation concerning claims under FCRA and state law

State Investigations and Enforcement Actions

- Negotiated a successful resolution to automotive sales practice claims brought by the Indiana Attorney General's office
- Negotiated a successful resolution with Florida regulators on behalf of a military lending company accused of violating the Military Lending Act (MLA) and EFTA
- Represent a leading auto finance company in Holder Rule litigation brought by the New Mexico Department of Justice
- Represented a commercial leasing company in investigation by the Florida Attorney General's office
- Represented a direct auto lender in multi-year investigation by the Massachusetts Attorney General's office
- Represented a leading installment lender in first-of-its-kind multistate litigation brought by state Attorneys Generals challenging consumer lending sales practices and products
- Represented an installment lender in investigation by the Illinois Attorney General's office
- Represented numerous finance companies in inquiries by state licensing agencies, including: California Department of Financial Protection and Innovation, Connecticut Department of Banking, Florida Office of Financial Regulation, Idaho Department of Finance, Illinois Department of Financial and Professional Regulation, Kansas Office of the State Bank Commissioner, Maryland Office of Financial Regulation, Massachusetts Division of Banks,

Michigan Department of Insurance and Financial Services, Missouri Division of Finance, New Hampshire Banking Department, New Jersey Division of Banking, New York Department of Financial Services, Oklahoma Department of Consumer Credit, South Dakota Division of Banking, Virginia Bureau of Financial Institutions, Washington Department of Financial Institutions

Speaking Engagements

- “Compliance Coffee Break: You just received a CID, now what?” Hudson Cook Webinars, co-presented with Lucy Morris, February 2024
- “Consumer Litigation and Arbitration Trends and Risk Mitigation Strategies Panel Discussion,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, October 2023
- “Safeguard Rules, Developments in Litigation Funding, Handling Lawsuits and Arbitrations Panel Discussion,” Legal Issues Lunch, OLA Lend360, October 2023
- “The CFPB’s Adolescent Years: Brash and Unrestrained Panel Discussion,” Consumer Financial Services Conference, Hudson Cook/CounselorLibrary, October 2023
- “Civil Investigation Demands – What you Should Know,” OLA Compliance University, July 2023
- “What’s New in Credit Contracts: Revisions to the Holder Rule,” CCFL Annual Consumer Financial Services Conference, May 2023
- “Deep Dive into the New Regulatory Era; Gain an understanding of the mindset inside the regulatory agencies and learn how to adjust your operations to avoid legal pitfalls. The Consumer Credit Industry Association (CCIA), April 2023
- “Harnessing Risk Assessment to Meet Compliance Goals,” OLA Compliance University, July 2022

Publications

- [“FTC’s Consumer Finance Pivot Brings Industry Pros and Cons,”](#) *Law360*, October 2025, co-authored with Lucy Morris
- [“Expect to Feel Aftershocks of Chopra’s CFPB Shake-Up,”](#) *Law360*, February 2025, co-authored with Lucy Morris
- [“CFPB Settles Decade-Long Case Against Foreclosure Relief Company and Four Attorneys for \\$12 million,”](#) Hudson Cook *Enforcement Alert*, February 2024, co-authored with Gabriela Chambi
- [“CFPB Orders National Bank to Pay Nearly \\$21 Million For Alleged Misconduct Relating to COVID-era Unemployment Payments,”](#) Hudson Cook *Enforcement Alert*, December 2023, co-authored with Lucy Morris
- “The FTC Holder Rule: A Ceiling, a Floor, or Both?” CCFL Quarterly Report, 2022, volume 76, numbers 1&2

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- [“Two CFPB Announcements Bolster Parallel State Enforcement Efforts,”](#) *Law360*, June 2022, co-authored with Lucy Morris
 - [“CFPB and New York AG Announce Settlement that Includes Permanent Industry Bans Against Debt Collection Companies and Employees,”](#) Hudson Cook *Enforcement Alert*, May 2022, co-authored with Mark E. Rooney
 - [“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 Lucy Morris
 - [“DOJ Announces \\$1.6 Million Settlement with Auto Finance Company for Failing to Refund Advances Paid by U.S. Servicemembers,”](#) *Spot Delivery*, November 2021
 - [“ABA CFSC Practitioner Profile: Jean Noonan, Hudson Cook, LLP,”](#) American Bar Association’s *Consumer Financial Services Committee Newsletter*, September 2021