

Carlin A. McCrory

Associate

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A seasoned regulatory and compliance attorney, Carlin brings extensive experience representing financial institutions, fintechs, lenders, payment processors, and virtual currency companies as they innovate and advance their business goals.

OVERVIEW

Carlin provides comprehensive compliance advice across a variety of topics, while also developing best practices strategies to help her clients advance their business goals. When clients need to implement new depository, bank-fintech, or other programs, Carlin helps identify relevant federal and state compliance requirements, often leveraging her substantial experience in regulatory compliance audits. Carlin also advises clients on all aspects of payments topics, from money transmission and the card network rules to Nacha Rule compliance. Her work with vendor contracts spans the transaction life cycle, from initial review of the agreement through termination, as well as drafting and reviewing clients' internal compliance policies and procedures.

Carlin's diverse practice includes counseling clients on matters related to the Electronic Signatures in Global and National Commerce Act (ESIGN), reviewing payment authorizations and setting up payment portals, to negotiating bank-fintech partnership agreements. Her Electronic Fund Transfers Act (EFTA) and implementing, Regulation E, experience includes advising on consumer liability for unauthorized transfers, initial account disclosures, change in terms notices, ATM disclosures, error resolution procedures, and overdraft and nonsufficient funds (NSF) requirements and disclosures. She frequently advises financial institution and money service business clients on Bank Secrecy Act (BSA), anti-money laundering (AML), and Office of Foreign Assets Control (OFAC) compliance obligations, and is well-versed on customer identification programs (CIP) and suspicious activity reporting (SAR).

Carlin regularly contributes to the firm's consumer financial services blog, *Consumer Financial Services Law Monitor*, and hosts the payments podcast, *The Payments Pros*, frequently writing and speaking on the latest developments in the financial services industry as well as other relevant issues.

AWARDS

- *Best Lawyers in America®: Ones to Watch*: Corporate Governance and Compliance Law (2025-2026), Criminal Defense: White-Collar (2026), Financial Services Regulation Law (2026)

TOP AREAS OF FOCUS

- Consumer Financial Services
- Consumer Law Compliance
- Military Lending
- Payments + Financial Technology
- Regulatory Investigations, Strategy + Enforcement

ALL AREAS OF FOCUS

- Artificial Intelligence
- Consumer Financial Services
- Consumer Law Compliance
- Credit Unions
- Digital Assets + Blockchain
- Financial Services
- Military Lending
- Payments + Financial Technology
- Regulatory Investigations, Strategy + Enforcement

EDUCATION AND CERTIFICATIONS

EDUCATION

- William & Mary Law School, J.D.
- Florida State University, B.S., *magna cum laude*

BAR ADMISSIONS

- Georgia
- Florida

COURT ADMISSIONS

- U.S. District Court, Northern District of Georgia
- U.S. District Court, Middle District of Georgia
- U.S. District Court, Southern District of Georgia
- U.S. District Court, Northern District of Florida
- U.S. District Court, Middle District of Florida
- U.S. District Court, Southern District of Florida
- U.S. Court of Appeals, Eleventh Circuit

SPEAKING ENGAGEMENTS

- Speaker, "Managing the Holistic Risks in Nested Third-Party Payment Processing," Nacha Smarter Faster Payments 2026, April 26, 2026.
- Speaker, "AI, AML, and Digital Assets: Enhancing BSA/AML Compliance in an Evolving Financial Services Market," UNC Banking Institute, March 26, 2026.

- Speaker, “[Payments, Money Movement & Emerging Rails](#),” 2026 CCBCA Winter Conference, February 26, 2026.
- Panelist, “Fraud – The Law, Preparation, and Response,” [UMACHA Payments Forum](#), November 18, 2025.
- Panelist, “[Fireside Chat: Fintech Partnerships](#),” Elliott Davis Financial Services Group Risk Management, Compliance, & Internal Audit Forum 2025, November 13, 2025.
- Speaker, “[Special Purpose Bank Charters](#),” TPPPA 2025 Solving the Payments Puzzle Conference, November 12-14, 2025.
- Speaker, “[Solutions for All of Life’s Payment Problems](#),” Lend360, October 6-8, 2025.
- Panelist, “Navigating Third-Party Agreements in the ACH Network,” PaymentsIQ Live!: Third-Party Opportunities in the ACH Network, November 2025.
- Presenter, “Due Diligence and Monitoring Bank-Fintech/Third-Party Partnerships,” Smarter Faster Payments 2025, April 2025.
- Speaker, “[Understanding the CFPB’s Larger Participant Rule](#),” UMACHA’s upcoming Managing Third-Party & Fintech Relationships Virtual Symposium, March 19, 2025.
- Presenter, “An Overview of the Corporate Transparency Act and Beneficial Ownership Reporting,” [INFiN Alliance 2024 MoneyTrends Conference](#), October 28-30, 2024.
- Presenter, “Electronic Transfer, Payment Processing, and Deposit Account Update,” [PLI Consumer Financial Services Institute](#), September 2024.
- Panelist, “Are Your AML, ID Verification, and KYC Procedures Up to Date?,” Online Lenders Alliance Compliance U, July 16, 2024.
- Panelist, “Litigators Serving the Profession, Practice and Public” | “Emerging Trends in Fintech and Payments Litigation,” Atlanta Bar Association, May 10, 2024.
- Panelist, “The Corporate Transparency Act: What You Need to Know,” Accounts Recovery, April 16, 2024.
- Speaker, “Exploring Federal Banking Regulators Guidance on Third-Party Risk Management,” Smarter Faster Payments 2024 Conference, May 9, 2024.
- Speaker, “[Managing Third-Party & Fintech Relationships Symposium](#),” UMACHA, March 21, 2024.
- Speaker, “[Check and Wire Fraud – Who Bears the Risk?](#),” NAFCU Webinar, October 31, 2023.
- Speaker, “[BSA/AML Risks & Monitoring for App Based Money Transfer Businesses \(Cash App, Venmo, Google Pay, Meta Pay\)](#),” The Experience: BSA/Payments/Financial Crimes 2023 Conference, October 4, 2023.
- Speaker, “[State Money Transmission Update](#),” TPPPA 2023 Solving the Payments Puzzle Conference, September 13, 2023.
- Speaker, “Know Your Customer – What Verification and Fraud Control Strategies Should Lenders Consider Effective in Today’s Economy?,” [Online Lenders Alliance Compliance University](#), July 19, 2023.
- Presenter, “Bank and Fintech Partnerships” UMACHA Virtual Fintech and Third-Party Symposium, June 29, 2023.
- Co-speaker, “Regulatory & Compliance Update,” [NC Bankers Association 2023 Bank Directors Assembly](#), April 3, 2023.
- Speaker, “Hot Tips for Mitigating Fraud and Avoiding Loss, ePayConnect Conference,” March 13, 2023.
- Speaker, “[Money Transmission Update](#),” TPPPA Conference, November 16-18, 2022.
- Speaker, “Payments 101,” Troutman Pepper, November 7, 2022.
- Speaker, “Washington Update,” Georgia Banker’s Association Compliance Conference, October 19, 2022.
- Speaker, “Overdrafts, ACH, and Disputes,” League of Southeastern Credit Unions Council Conference, June 14, 2022.
- Speaker, “[COPPA’s Next Act: Everyone is Eager to Protect Children’s Privacy](#),” Troutman Pepper, July 28, 2021.
- Presenter, “Pay Me Now! A Deep Dive Into the Present and Future of Earned Wage Access Products,”

Troutman Pepper, April 20, 2021.

PUBLICATIONS

- Co-host, *Payments Pros Podcast*.
- Podcast, "[The Debanking Debate: Regulators, Risk, and Reality for Payments](#)," *The Consumer Finance Podcast*, June 4, 2026.
- Co-author, "[Federal Reserve Proposes Special-Purpose "Payment Account" for Eligible Institutions](#)," *Financial Services Blog*, May 21, 2026.
- Co-author, "[Senate Banking Set to Mark Up the CLARITY Act: What to Watch in Tomorrow's Hearing](#)," *Financial Services Blog*, May 13, 2026.
- Co-author, "[GENIUS Act AML and Sanctions Rules for Stablecoin Issuers: A Few Surprises but Broadly as Expected](#)," *Financial Services Blog*, May 5, 2026.
- Co-author, "[DEA Reschedules State-Licensed Medical Marijuana to Schedule III](#)," *Financial Services Blog*, April 28, 2026.
- Co-author, "[House Bill Would Create New Federal Regime for Nonbank Payment Firms](#)," *Financial Services Blog*, April 22, 2026.
- Podcast, "[Before You Front the Funds: Benefits and Pitfalls of Earned Wage Access Tools](#)," *Hiring to Firing Podcast*, March 31, 2026.
- Co-author, "[How Payments Law Landscape Will Evolve In 2026](#)," *Law360*, January 22, 2026.
- Co-author, "[Federal Reserve Floats Special Purpose Payment Accounts for Fintechs and Nontraditional Banks](#)," *Financial Services Blog*, December 23, 2025.
- Podcast, "[The Future of Bank-Fintech Collaborations in Digital Finance](#)," *The Crypto Exchange*, October 15, 2025.
- Podcast, "[The 1033 Shake-Up: CFPB's New Rulemaking Adventure](#)," *The Consumer Finance Podcast*, October 2, 2025.
- Co-author, "[Credit Unions Advocate for Digital Asset Custody in Light of GENIUS Act](#)," *Consumer Financial Services Law Monitor*, July 23, 2025.
- Podcast, "[From Banks to FinTech: The Evolution of Small Business Lending](#)," *The Consumer Finance Podcast*, July 10, 2025.
- Co-author, "[Earned Wage Access: An Overview of Federal and State Regulation and Enforcement](#)," *CPI TechREG Chronicle*, May 2025.
- Co-author, "[OCC Patriot Bank Order Spotlights AML Issues For Managers](#)," *Law360*, April 11, 2025.
- Co-author, "[OCC Conditionally Approves Fintech Business Model for SmartBiz Bank, N.A.](#)," *Financial Services Blog*, March 19, 2025.
- Co-author, "[Where the F\(BO\) Is the Money? Part 1 – Synapse's Clarion Call for Standards](#)," *Troutman Pepper Financial Services*, September 10, 2024.
- Co-author, "[CFPB Proposal Would Set Up Federal Exams for Nonbank Consumer Digital Payment Players](#)," *The Financial Brand*, July 18, 2024.
- Co-author, "[Banks Should Continue to Prep for CFPB Data Rule Rollout](#)," *Law360*, March 14, 2024.
- Co-author, "[Troutman Pepper's 2023 Payments Year in Review](#)," *Troutman Pepper*, January 25, 2024.
- Co-author, "[Applications for Georgia Merchant Acquirer Limited Purpose Bank Charter: A Positive Sign for Fintech and Nonbank Direct Access to Card Networks](#)," *Troutman Pepper*, January 16, 2024.
- Co-author, "[Federal Reserve Board Rejects Application by SPDI That Is Not Federally Regulated](#)," *Troutman Pepper*, January 31, 2023.
- Co-author, "[Merchants Are Now Consumers? FTC Settles Action Against Payment Processor After Alleging Its Merchants Are "Consumers"](#)," *Troutman Pepper*, August 17, 2022.

- Co-author, "[Bipartisan Responsible Innovation Act Limits Howey Test; Suggests Non-Depository Institutions May Issue Payment Stablecoins](#)," *Troutman Pepper*, July 6, 2022.
- Co-author, "[Not Your Keys, Not Your Coin: SEC Tells Crypto-Custody Providers to Report Platform Users' Crypto Holdings as Balance Sheet Liabilities](#)," *Troutman Pepper*, April 25, 2022.
- Co-author, "[World's Largest Cryptocurrency Exchange Wins Dismissal of Class-Action Lawsuit](#)," *Troutman Pepper*, April 19, 2022.
- Co-author, "[Digital Asset Federal Legislation and Regulatory Developments: Wrap Up of First Quarter 2022](#)," *Troutman Pepper*, April 18, 2022.
- Co-author, "[New Virginia Law Permits Banks to Provide Virtual Currency Custody Services](#)," *Troutman Pepper*, April 13, 2022.
- Co-author, "[FTC Enters Consent Agreement With Payment Processor for Opening Merchant Accounts for Fictitious Companies](#)," *insideARM*, March 28, 2022.
- Co-author, "[FinCEN Implores Vigilance From Financial Institutions in Anticipation of Attempted Russia Sanctions Evasion](#)," *Troutman Pepper*, March 16, 2022.
- Co-author, "[Biden Signs Executive Order on Cryptocurrency](#)," *Troutman Pepper*, March 10, 2022.
- Co-author, "[2021 Consumer Financial Services Year in Review & A Look Ahead](#)," *Troutman Pepper*, January 28, 2022.
- Co-author, "[New Jersey Introduces a Virtual Currency and Blockchain Bill](#)," *Troutman Pepper*, December 8, 2021.
- Co-author, "[Every Company Should Have Access to a Bitcoin Account](#)," *Security*, October 19, 2021.
- Co-author, "[Rohit Chopra Confirmed as New CFPB Director](#)," *Troutman Pepper*, October 1, 2021.
- Co-author, "[Biden to Nominate Privacy Advocate Alvaro Bedoya as an FTC Commissioner](#)," *Troutman Pepper*, September 16, 2021.
- Co-author, "[SEC Responds to Warren's Letter on Authority to Regulate Crypto](#)," *Troutman Pepper*, August 17, 2021.
- Co-author, "[Gensler Speaks on Crypto at Aspen Security Forum](#)," *Troutman Pepper*, August 5, 2021.
- Co-author, "[Warren Writes Letter to SEC on Authority to Regulate Crypto](#)," *Troutman Pepper*, July 21, 2021.
- Co-author, "[Big Tech Critic Lina Khan Confirmed and Sworn In as New FTC Chair](#)," *Troutman Pepper*, June 16, 2021.
- Co-author, "[Unanimous Court Cuts FTC's Power to Seek Monetary Redress](#)," *Troutman Pepper*, April 23, 2021.
- Co-author, "[Biden to Nominate Big Tech Critic Lina Khan to Serve as an FTC Commissioner](#)," *Troutman Pepper*, March 23, 2021.
- Co-author, "[CFPB Rescinds Trump-Era Guidance Regarding 'Abusive Acts and Practices' Standard](#)," *Troutman Pepper*, March 15, 2021.
- Co-author, "[State Regulators Release New Nonbank Cybersecurity Exam Tool](#)," *Troutman Pepper Consumer Financial Services Law Monitor*, March 8, 2021.
- Co-author, "The Technological and Business Evolution of Machine Based Gambling in America," 14 *Wake Forest J. Bus. & Intell. Prop.* L.235, 2014.

MEDIA COMMENTARY

- Quoted, "[Fintech Lobbyist Says Tennessee Remittance Tax Is Unconstitutional](#)," *American Banker*, June 10, 2026.
- Quoted, "[New York State Introduces Bill Deeming EWA a Loan](#)," *American Banker*, January 27, 2026.
- Quoted, "[Proposed EWA Legislation Would Undercut State Regulations](#)," *American Banker*, January 15, 2026.
- Quoted, "[Why the CFPB's EWA Opinion Won't Dramatically Impact Fintechs](#)," *American Banker*, January 6,

2026.

- Quoted, "2025 Was a Big Year for Earned Wage Access," *American Banker*, December 30, 2025.
- Quoted, "Regulators Make It Easier to ID Customers Digitally," *FinXTech*, August 14, 2025.
- Quoted, "Credit Unions Rarely Engage in BaaS. North Bay is an Exception," *American Banker*, September 4, 2024.
- Quoted, "Is Your Cash in a Real FDIC-Insured Bank or a Look-Alike? Are You Sure?," *MarketWatch*, March 21, 2023.