

## Christopher Carlson

Partner

Richmond

[chris.carlson@troutman.com](mailto:chris.carlson@troutman.com)

D 804.697.1224



Chris advises clients on regulatory, civil, and criminal investigations and litigation. With a background as an assistant attorney general, he provides practical guidance to clients with matters involving state attorneys general and federal regulatory agencies.

### OVERVIEW

Chris draws upon his firsthand experience as an assistant attorney general to advise clients a wide variety of state, federal, and local regulatory matters, including investigations and enforcement actions. He is particularly experienced with state and federal consumer protection laws related to consumer financial services, data security, advertising and marketing, manufacturing, and digital currency. These complex cases often present novel issues regarding the scope of state statutory authority.

Chris handles multifaceted investigations, inquiries, and other regulatory and compliance matters involving state and federal agencies. His work includes managing significant multistate investigations and litigation brought by state attorneys general and federal agencies such as the Federal Trade Commission (FTC) and the Consumer Financial Protection Bureau (CFPB). Chris also assists clients at the local level, representing clients in local government litigation and before state commissions, handling disputes with local school divisions and constitutional challenges to proposed administrative rules.

Chris represents clients and the firm at national state attorneys general meetings and conferences, presenting critical issues to attorneys general and their staff, regulators, and other key personnel. He also regularly provides ongoing commentary and analysis on developments in the state and federal regulatory landscape through the firm's *Regulatory Oversight blog* and *State Attorneys General Monitor Newsletter*.

Before joining the firm, Chris served as an assistant attorney general in the Consumer Protection Division of the Office of the West Virginia Attorney General, where he litigated consumer protection actions involving state and federal laws prohibiting unfair or deceptive business practices related to debt collection, pharmaceuticals, motor vehicles, landlord-tenant issues, and student loans. His experience handling multistate litigations and settlements, adapting to evolving regulations, and handling complex arguments on the government's behalf has laid the foundation for Chris' ability to advise clients confidently and effectively.

### REPRESENTATIVE MATTERS

- Represented a financial services company in litigation involving novel issues of statutory interpretation resulting

in both a successful resolution and the Virginia General Assembly's passage of legislation to clarify the relevant statute.

- Represented a company in a state attorney general investigation regarding data privacy and retention policies resulting in the successful closure of the investigation without further action.
- Representing a medical device company in pending litigation brought by a state attorney general where the court granted partial dismissal of the state's claims.
- Representing a financial services company in a first-of-its-kind action where the state attorney general seeks to apply its credit services organization statute to a loan finder on behalf of another financial institution.
- Representing a financial services company in pending state attorney general and Consumer Financial Protection Bureau investigation, including challenging jurisdictional authority to take enforcement to take action.
- Represented numerous companies in multistate attorneys general investigations and litigations of various industries – including financial services, pharmaceuticals, automobile manufacturers, tobacco/nicotine, and startups – resulting in nationwide settlements.
- Co-authored a Supreme Court amicus brief in support of a certiorari petition by Bristol-Myers Squibb and Sanofi (BMS/Sanofi) challenging the Hawaii Attorney General's verdict against both companies.
- Counseled the Virginia Bankers Association in a first-of-its-kind petition Virginia State Corporation Commission, successfully challenging an effort by a credit union to expand its fields of membership and establishing the precedent that will require credit unions to conduct appropriate due diligence into whether another group can create its own credit union before joining an existing credit union.
- Counseled the Virginia Healthcare and Hospital Association in an action before Virginia State Corporation Commission successfully challenging the statutory basis for proposed rules by the Bureau of Insurance.
- Collaborated with the Federal Trade Commission in a joint multistate settlement with state attorneys general concerning a peer-to-peer money transfer company.

## AWARDS

- *Legal 500 United States: Government: State Attorneys General* (2024-2025)
- *Best Lawyers in America®: Ones to Watch: Administrative / Regulatory Law* (2023-2026)
- *Virginia Lawyers Weekly: "Up & Coming Lawyer"* (2022)
- American Bar Association Section of State and Local Government: Jefferson B. Fordham Up & Comer Award (2021)

## TOP AREAS OF FOCUS

- Business Litigation
- Enforcement Actions + Investigations
- Regulatory Investigations, Strategy + Enforcement
- State Attorneys General

## ALL AREAS OF FOCUS

- Business Litigation
- Consumer Financial Services
- Election Law + Redistricting
- Enforcement Actions + Investigations
- Federal Trade Commission (FTC)
- Financial Services

- Incidents + Investigations
- Litigation + Trial
- Regulatory Investigations, Strategy + Enforcement
- State Attorneys General

## **PROFESSIONAL/COMMUNITY INVOLVEMENT**

- Member, ABA Committee on State Attorneys General and Department of Justice Issues, Section of State and Local Government Law, American Bar Association
- Member, The Federalist Society

## **PROFESSIONAL EXPERIENCE**

- Assistant attorney general, Consumer Protection Division, Office of the West Virginia Attorney General, 2014-2017

## **EDUCATION AND CERTIFICATIONS**

### **EDUCATION**

- The George Washington University Law School, J.D., 2015
- University of Maryland, B.A., 2012, criminal justice
- University of Maryland, B.A., 2012, government and politics

### **BAR ADMISSIONS**

- Virginia
- West Virginia

### **COURT ADMISSIONS**

- U.S. District Court, Eastern District of Virginia
- U.S. District Court, Western District of Virginia
- U.S. District Court, Southern District of West Virginia
- U.S. Court of Appeals, First Circuit

### **CLERKSHIPS**

- Hon. David A. Faber, U.S. District Court, Southern District of West Virginia, 2017-2018

## **SPEAKING ENGAGEMENTS**

- Speaker, "Working with Your State Attorneys General," Credit and Collection News 19th Annual Credit Grantor Consortium, October 23, 2024.
- Speaker, "Trends in State and Federal Regulatory Enforcement," 2024 Credit and Collection News Annual Conference, April 11, 2024.
- Speaker, 2022 TPPA Annual Conference, Solving the Payments Puzzle, November 16-18, 2022.

- Co-panelist, “The Details of Working with your Attorney General,” Credit and Collection News Conference.
- Co-moderator, “Q&A – the Role of State Attorneys General and Why Should You Care,” Credit and Collection News Conference.
- Panelist, “The ‘Pattern’ of Racketeering Activity,” The RICO Report.
- Panelist, “State Attorneys General Call of Financial Giants to Eliminate Overdraft Fees,” Consumer Finance Podcast.
- Panelist, “State Attorneys General: Evolving Concerns, Compliance, and Enforcement,” Third Party Payment Processors Association.

## PUBLICATIONS

- Co-author, “[Growing Trend: State AGs Making Investigations Public](#),” *Reuters Legal* and *Westlaw Today*, August 20, 2025.
- Co-author, “[Justices’ Age Verification Ruling May Lead To More State Laws](#),” *Law360*, August 4, 2025.
- Co-author, “[2025 Mid-Year Review: State AGs in a New Era](#),” *Troutman Pepper Locke*, July 25, 2025.
- Co-author, “[Indiana AG Pushes Back on THC Legislation](#),” *Regulatory Oversight*, April 24, 2025
- Co-author, “[State AGs to Play Larger Role With Trump Back in Office](#),” *Law360*, March 25, 2025.
- Co-author, “[Unpacking the Illicit E-Cigarette Crackdown by State AGs](#),” *Law360*, March 19, 2025.
- Co-author, “[2024 State AG Year in Review](#),” *Troutman Pepper Locke*, January 30, 2025.
- Co-author, “[Predicting Where State AGs Will Direct Their Attention in 2025](#),” *Law360*, January 22, 2025.
- Podcast, “[The Growing Role of State AGs in AI Regulatory & Enforcement Issues](#),” *The Good Bot: Artificial Intelligence, Health Care, and the Law*, January 21, 2025.
- Co-author, “[Looking Back at 2024’s Noteworthy State AG Litigation](#),” *Law360*, January 15, 2025.
- Podcast, “[Auto Finance Under the Microscope: Unpacking Landmark FTC and AG Settlements](#),” *Moving the Metal: The Auto Finance Podcast*, January 14, 2025.
- Podcast, “[12 Days of Regulatory Insights: Day 8 – Inside the Texas AG’s Office](#),” *Regulatory Oversight Podcast*, December 16, 2024.
- Podcast, “[12 Days of Regulatory Insights: Day 3 – State AG Oversight in the Health Care Industry](#),” *Regulatory Oversight Podcast*, December 9, 2024.
- Co-author, “[2024 State AG Election Re-Cap: Where Things Stand the Day after Election Day](#),” *Troutman Pepper*, November 6, 2024.
- Co-author, “[Indiana Appellate Court Grapples With State AGs’ Personal Jurisdiction Over Digital Platforms](#),” *Westlaw Today*, October 25, 2024.
- Co-author, “[Takeaways From Texas AG’s Novel AI Health Settlement](#),” *Law360*, September 27, 2024.
- Co-author, “[State AGs File Amicus Curiae Brief in US Supreme Court Case Involving Flavored E-Cigarettes](#),” *Regulatory Oversight* and *Tobacco Law Blog*, September 24, 2024.
- Podcast, “[Investigation Tag Team: The FTC and the State of Arizona](#),” *Moving the Metal: The Auto Finance Podcast*, September 17, 2024.
- Co-author, “[New Jersey Issues Notice of Violations and Fines to Retailers Allegedly in Violation of the State’s Flavor Ban](#),” *Regulatory Oversight* and *Tobacco Law Blog*, August 30, 2024.
- Co-author, “[State AGs Take Action to Quell Proliferation of Intoxicating Hemp Products](#),” *Cannabis Business Times*, August 12, 2024.
- Co-author, “[California’s AB 3129: Implications for Private Equity Investments in Physician Practices](#),” *Troutman Pepper*, April 16, 2024.
- Co-author, “[2023 State AG Year in Review](#),” *Troutman Pepper*, January 29, 2024.
- Co-author, “[California Adopts Landmark GHG Emissions and Climate Risk Reporting Laws, Eclipsing](#)

Anticipated Federal Requirements,” *Troutman Pepper*, October 13, 2023.

- Co-author, “Making an Impact: State Attorneys General Races in 2023 and Beyond,” *Reuters*, September 7, 2023.
- Co-author, “What RJ Reynolds’ Calif. Suit Means for Tobacco Regulation,” *Law360*, June 27, 2023.
- Co-author, “State AGs Choose Products Liability Case as Battleground for State Sovereignty,” *Troutman Pepper*, June 15, 2023.
- Co-author, “It’s Not Just the Feds: State AGs Are Reaching Through Your Corporation,” *Corporate Compliance Insights*, April 5, 2023.
- Co-author, “Attorneys General Enforce Lemon Laws and Penalize Puppy Mills,” *Bloomberg Law*, February 7, 2023.
- Co-author, “Parsing the New Wave of State Tobacco Settlement Suits,” *Law360*, January 10, 2023.
- Co-author, “Prepare for Renewed FTC Regulatory Focus on Hidden and Junk Fees,” *Bloomberg Law*, December 30, 2022.
- Co-author, “Key Developments From State Attorneys General In 2022,” *Law360*, December 22, 2022.
- Co-author, “2022 Election: Attorney General Races to Watch This Season,” *Reuters*, November 3, 2022.
- Co-author, “Pattern Element Is Still Crucial To Defending RICO Cases,” *Law360*, September 15, 2022.
- Co-author, “Iowa Attorney General Brings Suit Against Participating Manufacturers to the Master Settlement Agreement,” *Regulatory Oversight Blog*, August 9, 2022.
- Co-author, “State AGs Ask Congress to Fight THC That Attracts Youth,” *Vapor Voice*, July 1, 2022.
- Co-author, “Vermont Continues Its Crackdown on Online ENDS Sellers,” *Tobacco Law Blog*, April 19, 2022.
- Co-author, “Auto Industry Faces Stepped-Up Scrutiny by State AGs,” *WardsAuto*, March 15, 2022.
- Co-author, “State AG Cooperation on Opioids: A Model for Protecting Consumers,” *Reuters*, February 17, 2022.
- Co-author, “Your Company May Be a Likely Target of State Attorneys General. You May Not See It Coming,” *Corporate Compliance Insights*, February 15, 2022.
- Co-author, “State Coordination Will Continue to Regulate Use of Bitcoin,” *Bitcoin Magazine*, January 21, 2022.
- Co-author, “Navient Settles with State AG Coalition Over Alleged Unfair, Deceptive, and Abusive Student Loan Origination and Servicing Practices,” *Troutman Pepper*, January 20, 2022.
- Co-author, “Five Tips for When State Attorneys General Come Knocking,” *Troutman Pepper*, January 5, 2022.
- Co-author, “State Regulators Block Celsius from Offering Interest-Bearing Cryptocurrency Accounts,” *The Banking Law Journal*, January 2022.
- Co-author, “States Attorneys General to Expand National Roles in 2022,” *Bloomberg BNA*, December 29, 2021.
- Co-author, “When Investigators Pile On, Make Sure You Navigate These Pitfalls,” *Corporate Compliance Insights*, November 3, 2021.
- Co-author, “Down-to-the-Wire Virginia Attorney General Race Presages Other Close Races in 2022,” *Troutman Pepper*, November 1, 2021.
- Co-author, “Local Law Banning Tobacco Product Sales Gets AG’s Approval,” *Massachusetts Lawyers Weekly*, October 14, 2021.
- Co-author, “Thirty State Attorney General Offices Are Up for Grabs,” *Reuters*, October 13, 2021.
- Co-author, “From Tobacco to Opioids, Oil, and Social Media — What’s Next in State AG Cooperation on Public Health Issues?,” *Troutman Pepper*, October 11, 2021.
- Co-author, “State Regulators Block Celsius From Offering Interest-Bearing Cryptocurrency Accounts,” *Troutman Pepper*, October 7, 2021.
- Co-author, “Crypto: Every Regulator Wants a Piece of the Action,” *Bloomberg Law*, August 2021.
- Co-author, “Republican AGs Likely to Challenge Biden on Multiple Fronts,” *Law360*, March 3, 2021.
- Co-author, “State AGs’ 2020 Actions Offer Hints at 2021 Priorities,” *Law360*, January 12, 2021.

- Co-author, "What the Biden Administration Can Expect From State AGs," *Law360*, December 7, 2020.
- Co-author, "State AGs Have a Decisive Role to Play in Election," *Law360*, October 30, 2020.
- Co-author, "INSIGHT: State Attorneys General Can Deputize Attorneys to Fight Covid-19 Fraud," *Bloomberg Law*, May 21, 2020.
- Co-author, "Federal Judge Temporarily Halts Massachusetts' Sweeping COVID-19 Debt Collection Emergency Regulations," *Credit and Collection News*, May 7, 2020.
- Co-author, "Public Meeting Requirements in the Age of COVID-19," *Law360*, April 14, 2020.
- Co-author, "2019 Consumer Financial Services Year in Review & a Look Ahead," *Troutman Sanders*, February 24, 2020.

## **MEDIA COMMENTARY**

- Quoted, "As FDA Lays Off Thousands, State AGs Step In to Probe Counterfeit Weight Loss Drugs," *Corporate Counsel*, July 21, 2025.
- Quoted, "CFPB Closure Would Leave Consumer Protections in Uncertain Territory, Observers Say," *The National Law Journal*, February 25, 2025.
- Quoted, "As AG, Bob Ferguson Vastly Expanded His Office to Focus on Consumer Lawsuits," *The Seattle Times*, October 13, 2024.
- Quoted, "State Attorneys General Flexing Muscles, Posing Growing Risk to Legal Departments," *Corporate Counsel*, June 8, 2023.
- Quoted, "States' War on ESG Investing Could Hinge on Obscure KY Suit," *Corporate Counsel*, January 23, 2023.
- Quoted, "Judge With 'West Virginia Grit' Takes on 1st Opioid MDL Trial," *Law360*, April 28, 2021.