Christopher J. Capurso

Counsel

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Chris focuses his practice on consumer financial services compliance, guiding clients through the many federal and state laws and regulations that impact consumer credit programs.

OVERVIEW

Chris' practice focuses on federal and state consumer financial services law, with a particular focus on counseling clients in the automotive retail and auto finance industries. He regularly advises financial institutions, lenders, and sales finance companies in the development and maintenance of automobile finance, closed-end and open-end lending, fintech, point-of-sale, solar finance, small dollar, and other credit programs. Chris also provides compliance advice on consumer reporting, tenant screening and background screening under the Fair Credit Reporting Act (FCRA) and state law. He regularly provides guidance on federal consumer protection laws and regulations in addition to the FCRA, including the Truth in Lending Act (TILA), the Equal Credit Opportunity Act (ECOA), the Fair Debt Collection Practices Act (FDCPA), the Telephone Consumer Protection Act (TCPA), and the Electronic Signatures in Global and National Commerce Act (E-SIGN). Chris also regularly counsels clients on compliance with state licensing requirements. Chris is the co-host of *Moving the Metal: The Auto Finance Podcast* where they discuss all things related to the auto finance industry.

Chris earned both his J.D. and M.B.A. from the College of William & Mary, where he served as senior articles editor for the *William & Mary Business Law Review.* Chris regularly uses his M.B.A. experience in giving clients practical compliance advice that can be implemented into the development or maintenance of consumer finance services programs.

REPRESENTATIVE MATTERS

- Served a part-time secondment as corporate counsel with the nation's largest used motor vehicle retailer.
- Regularly advises banks, captives, and other finance companies in the maintenance, development, and servicing and collections of vehicle financing and leasing programs.
- Advised clients in examinations related to ancillary products in vehicle finance transactions.
- Advised client in the development of a subscription-based vehicle service contract program.
- Regularly advises employers and background screening companies on FCRA and state consumer reporting law compliance.
- Regularly advises property managers and tenant screening companies on FCRA and state consumer reporting

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law compliance.

- Advised startups on baseline FCRA, state consumer reporting law, and other compliance requirements to become consumer reporting agencies.
- Advised a large energy utility in its development of a nationwide solar sales finance program.
- Performed due diligence licensing and document reviews in M&A transactions and portfolio acquisitions on multiple types of entities, including sales finance companies, fintechs, debt collection agencies, and rent-to-own companies.
- Worked with a national bank on the development of merchant point-of-sale financing programs and provided compliance advice related to TILA, GLBA, ECOA, and E-SIGN, among others.
- Counseled a fintech company in the development of its online lending platform, including the creation of multistate loan and ancillary documents.
- Regularly counsels clients including banks, credit unions, installment lenders, sales finance companies, and motor vehicle dealers on compliance with Virginia law.

AWARDS

- *JD Supra* Readers' Choice Awards, Transporation (2026)
- *Best Lawyers in America®: Ones to Watch:* Banking and Finance Law (2024-2027), Litigation – Banking and Finance (2026-2027)

TOP AREAS OF FOCUS

- Auto Finance
- Banking + Financial Services Regulation
- Consumer Financial Services
- Consumer Law Compliance
- Fair Credit Reporting Act (FCRA)
- Financial Services
- Payments + Financial Technology
- Residential Solar Leasing + Finance

ALL AREAS OF FOCUS

- Artificial Intelligence
- Auto Finance
- Automotive
- Banking + Financial Services Regulation
- Consumer Financial Services
- Consumer Law Compliance
- Consumer Reporting Agencies + Background Screening
- Fair Credit Reporting Act (FCRA)
- Financial Services
- Online Lending
- Payments + Financial Technology
- Point-of-Sale Finance

- Residential Solar Leasing + Finance
- Telephone Consumer Protection Act (TCPA)

PROFESSIONAL/COMMUNITY INVOLVEMENT

- American Bar Association, Business Law Section (Consumer Financial Services Committee)
  - Vice chair, Personal Property Financing Subcommittee
  - Member, SUNY Potsdam Business Administration Advisory Council

EDUCATION AND CERTIFICATIONS

EDUCATION

- William & Mary Law School, J.D., 2016, senior articles editor, *William & Mary Business Law Review*
- College of William & Mary, Raymond A. Mason School of Business, M.B.A., 2016
- State University of New York at Potsdam Crane School of Music, B.M., *summa cum laude*, 2012

BAR ADMISSIONS

- Virginia

SPEAKING ENGAGEMENTS

- Speaker, "Litigation, Regulation, and Legislation, Oh My!," National Consumer Reporting Association's Elevate 2026, New Orleans, LA, November 11, 2026.
- Speaker, "Recent Federal Regulatory Developments for Creditor's Rights Attorneys," Virginia Creditors Bar Association Annual Collections Seminar, Richmond, VA, October 23, 2026.
- Speaker, "FTC & Dealer Advertising Updates: Key Legal and Compliance Risks," Association of Consumer Vehicle Lessors Annual Conference, Asheville, NC, October 12, 2026.
- Speaker, "Regulatory Update and Discussion, " Auriemma Roundtables, Auto Finance Compliance Session, Kansas City, MO, September 29, 2026.
- Speaker, "Managing Third-Party Vendor Risk Management," Online Lenders Alliance Compliance University, July 22-23, 2026.
- Speaker, "Charging Ahead: Consumer Financing Issues in the Electric Vehicle Marketplace," American Bar Association's Business Law Spring Meeting 2026, April 16, 2026.
- Speaker, "Reseller Liability: Double Dipping in the FCRA Pond" and "Clean Slate, Messy Compliance," National Consumer Reporting Association 2025 Annual Conference, November 12, 2025.
- Presenter, "CFPB and State AGs: What to Expect in 2026," SCIC, MVPPA, GAPA 2025 Annual Meeting, September 25, 2025.
- Moderator, "Trump 2.0: Impacts on Auto Finance in the U.S. and Canada," American Bar Association Business Law Section Fall 2025 Meeting, September 19, 2025.
- Speaker, "Federal Rulemaking and Enforcement – One Step Back and Two Steps Forward?," 2025 OLA Legal Issues Conference, February 11, 2025.
- Speaker, "CFPB Auto Finance and Leasing Exam," Association of Consumer Vehicle Lessors Annual Conference, Nashville, TN, October 14, 2024.
- Speaker, "Metro 2 Primer," Troutman Pepper Webinar, October 5, 2023.
- Speaker, "Auto Finance in the Roaring 20s: What's on the Horizon," ABA Business Law Section Annual Meeting, Washington, D.C., September 15, 2022.

- Speaker, “Making Compliance More Than an Afterthought,” Online Lenders Alliance (OLA) 2022 Compliance University, July 20, 2022.
- Speaker, “Beer & Basics: Auto Finance Compliance Issues,” ABA Consumer Financial Services Subcommittee Meeting, Tucson, AZ, January 16, 2020.
- Speaker, The EDGE Compliance Training Program, American Financial Services Association, Atlanta, GA, June 10, 2019.
- Speaker, “Fair Lending 101: An Overview of the Equal Credit Opportunity Act,” National Association of Federally-Insured Credit Unions Webinar, Arlington, VA, June 4, 2019.
- Speaker, “Legal Compliance & You: An Overview of Everyone’s Favorite Topic,” Virginia Independent Automobile Dealers Association 2019 Dealer Day, Charlottesville, VA, May 14, 2019.
- Speaker, “Beer & Basics: *CFPB v. Ocwen*,” ABA Business Law Section Annual Meeting, Chicago, IL, September 13, 2017.

PUBLICATIONS

- Co-author, “New York AG Settlement Signals Increased Scrutiny of Dealer Fee Practices and Add-On Products ,” *insideARM*, October 20, 2026.
- Podcast, “*Catch Me If You Can*: The Fine Print of Background Checks,” *Hiring to Firing* Podcast, October 6, 2026.
- Podcast, “Don’t Move That Metal: SCRA Lessons From a Costly Settlement,” *Moving the Metal: The Auto Finance Podcast*, September 29, 2026.
- Podcast, “The Ghost of CARS Rule Past: FTC and Connecticut Team Up on Junk Fees,” *Moving the Metal: The Auto Finance Podcast*, September 22, 2026.
- Podcast, “California Dreamin’ of October 1: The CARS Act Comes to California,” *Moving the Metal: The Auto Finance Podcast*, September 15, 2026.
- Podcast, “The FTC Caught Up: What You Need to Know About Its Latest Disparate Impact Statement,” *Moving the Metal: The Auto Finance Podcast*, September 1, 2026 and *The Consumer Finance Podcast*, September 3, 2026.
- Podcast, “FTC Hits the Brakes on Disparate Impact,” *Moving the Metal: The Auto Finance Podcast*, August 25, 2026.
- Podcast, “Point-of-Sale Finance Series: Auto Finance — Dealer Risk, Lien Perfection, and Compliance Essentials for Market Entrants,” *The Consumer Finance Podcast*, August 20, 2026.
- Podcast, “13 Years and Counting: The Rise of the Forever Car in America,” *Moving the Metal: The Auto Finance Podcast*, August 11, 2026.
- Podcast, “From the FTC to the Five Boroughs: Auto Enforcement Goes Local,” *Moving the Metal: The Auto Finance Podcast*, July 28, 2026.
- Podcast, “Buckle Up: Everything That Happened in Auto Finance So Far in 2026,” *Moving the Metal: The Auto Finance Podcast*, July 14, 2026.
- Podcast, “States Respond to the FTC’s Notorious 97 Letters: The Sequel No Dealer Wanted,” *Moving the Metal: The Auto Finance Podcast*, June 30, 2026.
- Podcast, “The $10 Million Oops: How One New Jersey Dealer’s Penalty Got a Dramatic Makeover,” *Moving the Metal: The Auto Finance Podcast*, June 16, 2026.
- Podcast, “Top 100 Dealerships by F&I Preview; What’s Next for FTC’s Dealership Ad Crackdown?,” *Automotive News Daily Dive,* June 19, 2026.
- Podcast, “Kicking the Tires on Kentucky: SB 158 and the Add-On Product Revolution,” *Moving the Metal: The Auto Finance Podcast*, May 26, 2026.
- Podcast, “Fraud on the Front Line: How Dealers Are Fighting Emerging Auto Finance Scams,” *Moving the Metal: The Auto Finance Podcast*, May 21, 2026.

- Podcast, “Price Tags and Pitfalls: Inside the FTC–Maryland Dealer Smackdown,” *Moving the Metal: The Auto Finance Podcast*, April 28, 2026.
- Podcast, “Auto Finance Year in Review, Part 2: Security Clearances, Supervisory Lines, and Connected Cars,” *Moving the Metal: The Auto Finance Podcast*, April 14, 2026.
- Podcast, “Warning Letters and Warren Letters: What the Auto Finance Industry Needs to Know,” *Moving the Metal: The Auto Finance Podcast*, March 31, 2026.
- Podcast, “Auto Finance Year in Review, Part 1: From FTC CARS Rule Collapse to a State-Led Patchwork,” *Moving the Metal: The Auto Finance Podcast*, March 17, 2026.
- Podcast, “Empire State of Scrutiny: The New York FAIR Act and Auto Lending,” *Moving the Metal: The Auto Finance Podcast*, February 24, 2026.
- Podcast, “Soaring Repos and Senate Requests: Warren Targets Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, February 17, 2026.
- Co-author, “Financial Services Industry 2025 Digital Assets Year in Review,” *Troutman Pepper Locke*, February 5, 2026.
- Podcast, “State AGs in the Driver’s Seat: Auto Finance Enforcement in the Trump 2.0 Era,” *Moving the Metal: The Auto Finance Podcast*, January 27, 2026.
- Podcast, “From Showroom to Server Room: AI in Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, January 13, 2026.
- Podcast, “New Year, New Surprises? 2026 Resolutions for Dealers and Auto Finance Companies,” *Moving the Metal: The Auto Finance Podcast*, December 30, 2025.
- Podcast, “Deck the Halls, Not the Trade Lines: Auto Fraud Talk,” *Moving the Metal: The Auto Finance Podcast*, December 16, 2025.
- Podcast, “State Law Roundup: Arbitration Changes and Junk Fee Rules in California and Massachusetts,” *Moving the Metal: The Auto Finance Podcast*, November 11, 2025.
- Podcast, “Quarterly Insights: Driving Through Q2 Auto Finance Data,” *Moving the Metal: The Auto Finance Podcast*, October 28, 2025.
- Podcast, “State Law Roundup: A Focus on Connecticut and Oregon,” *Moving the Metal: The Auto Finance Podcast*, October 14, 2025.
- Podcast, “The Larger Participant Rule: A New Route for Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, September 23, 2025.
- Podcast, “Driving New Standards With California’s CARS Rule,” *Moving the Metal: The Auto Finance Podcast*, September 9, 2025.
- Podcast, “The Road to Regulation: Vehicle Service Contracts Explained,” *Moving the Metal: The Auto Finance Podcast*, August 12, 2025.
- Podcast, “The Current State of the Holder Rule: Friend or Foe?,” *Moving the Metal: The Auto Finance Podcast*, July 29, 2025.
- Podcast, “Driving Digital Security: The FTC’s Safeguards Rule Explained,” *Moving the Metal: The Auto Finance Podcast*, July 8, 2025.
- Podcast, “Doc Fees Decoded: The Price of Paperwork in Auto Sales,” *Moving the Metal: The Auto Finance Podcast*, June 24, 2025.
- Podcast, “Cruising Through Change: The Auto-Finance Industry’s New Era Under Trump Unveiled,” *Moving the Metal: The Auto Finance Podcast*, June 11, 2025.
- Co-author, “Navigating Change: First 100 Days Under the Trump Administration,” *2025 Digital Asset Developments*, May 28, 2025.
- Podcast, “Under the Hood: Exploring the CFPB’s 2025 Focus,” *Moving the Metal: The Auto Finance Podcast*, May 20, 2025.
- Podcast, “Driven by Data: Auto Finance Trends Uncovered,” *Moving the Metal: The Auto Finance Podcast*, May 6, 2025.

- Podcast, “Shifting Gears: Adapting to Regulatory Changes in Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, April 22, 2025.
- Podcast, “Dialing In: The TCPA and Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, April 8, 2025.
- Co-author, “The Tortured Creditors Department: Decoding Alternative Financial Services Developments in 2024,” *The Business Lawyer,* Vol. 80, Spring 2025.
- Podcast, “Through the Crystal Ball: What’s Next for Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, March 25, 2025.
- Podcast, “Requiem for the Rules: The Rise and Fall of the Junk Fee and CARS Rules,” *Moving the Metal: The Auto Finance Podcast*, March 11, 2025.
- Podcast, “The Future of Auto Dealership Compliance: A Conversation With Tom Kline,” *Moving the Metal: The Auto Finance Podcast*, February 25, 2025.
- Podcast, “From Federal to Local: CFPB’s Blueprint for State Regulators,” *Moving the Metal: The Auto Finance Podcast*, February 11, 2025.
- Co-author, “How Cos. Can Use Data Clean Rooms to Address Privacy,” *Law360*, February 10, 2025.
- Podcast, “2024 Year in Review: Key Developments in Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, January 28, 2025.
- Podcast, “Auto Finance Under the Microscope: Unpacking Landmark FTC and AG Settlements,” *Moving the Metal: The Auto Finance Podcast*, January 14, 2025.
- Podcast, “2024 Privacy Trends and Their Impact on Auto Finance,” *Moving the Metal: The Auto Finance Podcast*, December 17, 2024.
- Podcast, “Lemon Law Shakeup: *Rodriguez* vs. *FCA US* Has Unexpected Result,” *Moving the Metal: The Auto Finance Podcast*, November 25, 2024.
- Podcast, “CFPB’s Supervisory Highlights on Auto-Finance and Auto-Servicing,” *The Consumer Finance Podcast*, November 7, 2024.
- Podcast, “Breaking Granite: Understanding New Amendments to the New Hampshire Retail Installment Sales Act,” *Moving the Metal: The Auto Finance Podcast*, November 1, 2024.
- Podcast, “Dissecting Oral Arguments in NADA’s Challenge to the CARS Rule,” *Moving the Metal: The Auto Finance Podcast*, October 18, 2024.
- Co-author, “New Hampshire Enacts Law Overhauling Its Motor Vehicle Retail Installment Sales Act,” *Consumer Financial Services Law Monitor*, August 30, 2024. Republished on *Westlaw Today*, September 25, 2024.
- Podcast, “Investigation Tag Team: The FTC and the State of Arizona,” *Moving the Metal: The Auto Finance Podcast*, September 18, 2024.
- Podcast, “FTC CFPB Enforcement Report,” *Moving the Metal: The Auto Finance Podcast*, August 28, 2024.
- Podcast, “Loans, Retail Installment Contracts, and Refinancing Programs,” *Moving the Metal: The Auto Finance Podcast*, August 13, 2024.
- Podcast, “The CFPB’s Report on Negative Equity in Auto Lending,” *Moving the Metal: The Auto Finance Podcast*, July 31, 2024.
- Podcast, “The CARS Rule,” *Moving the Metal: The Auto Finance Podcast*, July 16, 2024.
- Podcast, “Auto Finance – CFPB Circular Release,” *The Consumer Finance Podcast*, June 18, 2024.
- Podcast, “Navigating Ancillary Products in Auto Finance,” *The Consumer Finance Podcast*, June 4, 2024.
- Podcast, “Auto Finance – The Holder Rule,” *The Consumer Finance Podcast*, May 21, 2024.
- Podcast, “Auto Finance – The CFPB Complaints Report,” *The Consumer Finance Podcast*, May 7, 2024.
- Podcast, “Navigating the CFPB’s Auto Finance Data Collection Initiative,” *The Consumer Finance Podcast*, April 25, 2024.
- Co-author, “So Long, Farewell: Compliance Issues Facing Small-Dollar Lenders in 2023,” *The Business Lawyer,* Vol. 79, Spring 2024.

- Co-author, “The CFPB’s Proposed Rulemaking and Its Implications for the Credit Reporting Industry,” *American Bar Association Litigation Section Winter Newsletter*, February 14, 2024.
- Co-author, “Troutman Pepper Publishes *2023 Consumer Financial Services Year in Review and A Look Ahead* *Troutman Pepper*, February 1, 2024.
- Co-author, “Data Furnishers Should Watch CFPB Plans for Class Actions,” *Law360*, October 17, 2023.
- Co-author, “CFPB Outlines Rulemaking Plan to Dramatically Alter Decades of FCRA Requirements for Everyone in the Consumer Data Ecosystem,” *Troutman Pepper*, September 21, 2023.
- Co-author, “Impending FCRA Data Broker Rulemaking Announced by CFPB Director Chopra at White House Data Broker Roundtable,” *Troutman Pepper*, August 16, 2023.
- Co-author, “The Gathering Storm: Compliance Issues Facing Small-Dollar Lenders in 2022,” *The Business Lawyer,* Vol. 78, Spring 2023.
- Co-author, “FTC Proposed Ground-Breaking Federal Regulation of Motor Vehicle Dealer Sales Practices,” *Troutman Pepper*, June 24, 2022.
- Co-author, “FTC Revisiting Key Digital Advertising Guidance,” *DBA Digest*, June 10, 2022.
- Co-author, “Stuck in a Time Loop: The Compliance Clock Is Still Ticking for Small-Dollar Lenders in 2021,” *The Business Lawyer,* Vol. 77, Spring 2022.
- Co-author, “CFPB Massively Expands Enforcement of Anti-Discrimination Through UDAAP,” *Troutman Pepper*, March 17, 2022.
- Co-author, “2021 Consumer Financial Services Year in Review & A Look Ahead,” *Troutman Pepper*, January 28, 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, “CFPB Opens Inquiry Into Buy Now Pay Later,” *Troutman Pepper*, December 21, 2021.
- Co-author, “E-Sign Works: How the Legal System Got Electronic Contracting Laws Right,” *Westlaw Today*, October 8, 2021.
- Co-author, “CFPB Sets June 2022 Compliance Date for Payday Rule,” *Troutman Pepper*, September 13, 2021.
- Co-author, “CFPB Issues Long-Awaited Notice of Proposed Rulemaking on Small Business Lending Data Collection,” *Troutman Pepper*, September 2, 2021.
- Co-author, “Tik Tok: The Compliance Clock Is Ticking for Small-Dollar Lenders in 2020,” *The Business Lawyer,* Vol. 76, Spring 2021.
- Author, “The Different Flavors of RegTech and SupTech: How Companies and Regulatory Agencies Are Leveraging Technology to Improve Regulatory Compliance and Supervision,” *Business Law Today*, November 2020.
- Co-author, “Small Dollar Lending Regulation in 2019,” *The Business Lawyer,* Vol. 75, Spring 2020.
- Author, “The OCC Fintech Charter: Status Report,” *American Bar Association Consumer Financial Services Committee Newsletter*, November 2017.
- Author, “Burgers, Doughnuts, and Expatriations: An Analysis of the Tax Inversion Epidemic and a Solution Presented Through the Lens of the Burger King-Tim Hortons Merger,” 7 *WM. & MARY BUS. L. REV.* 579, 2016.

MEDIA COMMENTARY

- Quoted, “Why NADA, Experts Urge Dealers to Keep Uniform F&I Pricing Despite FTC, CFPB Retreat,” *Automotive News*, October 26, 2026.
- Quoted, “Regulators Cast Wider Net for Deceptive Auto Finance Pricing, Advertising,” *Auto Finance News*, October 21, 2026.
- Quoted, “FTC’s Statement on AI Output ‘Steering’ Leaves Key Questions Unanswered,” *Law.com*, July 16, 2026.

- Quoted, “Social Media Advertising Poses Compliance Risks Following FTC Warnings,” *Car Dealership Guy*, May 29, 2026.
- Quoted, “All Dealerships Urged to Take FTC Warnings About Deceptive Pricing Seriously as Scrutiny Ramps Up,” *Automotive News*, May 19, 2026.
- Quoted, “4 Attorneys Decipher Developments Since FTC Sent Letters to Dealers Nationwide,” Auto Remarketing, April 24, 2026.
- Quoted, “Enforcement Actions Could Follow as Next Step From FTC,” *Car Dealership Guy*, April 24, 2026.
- Quoted, “Auto Lenders See Rise in Litigation, Consumer Complaints Spurred by Social Media, AI,” *Auto Finance News,* February 23, 2026.
- Quoted, “State Regulatory Activity to Increase Despite CFPB Funding Ruling,” *Auto Finance News*, January 9, 2026.
- Quoted, “State Regulators Are Stepping in as Auto Compliance Risks Build for 2026,” *Car Dealership Guy*, December 24, 2025.
- Quoted, “Texas Is a Leader in the Auto Finance Industry. Here’s Why.,” *Automotive News*, November 26, 2025.
- Quoted, “F&I Tips: Remember the Holder Rule,” *Automotive News*, September 16, 2025.
- Quoted, “FTC’s Holder Rule Interpretation Adds New Pressure on Auto Dealers, Lenders,” *Car Dealership Guy*, September 9, 2025.
- Quoted, “Dealerships Might Be Able to Live With California Version of CARS Rule Moving Through Legislature ,” *Automotive News*, August 27, 2025.
- Quoted, “Dealership Doc Fees Are Capped at $85 in California, but That Could Rise to $500,” *Automotive News*, July 3, 2025.
- Quoted, “Trump FTC Chairman OK’d Some Cases Against Dealerships, Showed Skepticism on Disparate Impact,” *Automotive News*, February 26, 2025.
- Quoted, “CFPB Scrutiny of F&I Practices Shows Parallels With Cars Rule, Attorney Says,” *Automotive News*, November 25, 2024.
- Quoted, “Attorneys: Trump Victory Could Change CARS Rule, Produce Quieter FTC, CFPB,” *Automotive News*, November 7, 2024.
- Quoted, “3 Ways to Prepare for Ramped-Up FCRA Scrutiny,” *insideARM*, October 14, 2022.
- Quoted, “Small Banks Count on New Appraisal Rule to Boost CRE Lending,” *American Banker*, May 4, 2018.