

Jason M. Cover

Partner

Philadelphia

jason.cover@troutman.com

D 215.981.4821



Jason's in-depth experience advising on consumer lending matters both as in-house counsel and outside advisor provides extensive industry knowledge for his financial services clients.

OVERVIEW

Jason's practice focuses on federal and state consumer lending and payments laws, including those that apply to installment loans, vehicle-secured loans, lines of credit, unsecured loans, credit cards, point-of-sale finance, and timeshare/vacation finance.

He counsels providers of consumer financial services, including banks, licensed lenders, and fintech providers, on regulatory compliance matters and government supervisory and enforcement matters.

Jason regularly provides guidance on electronic payments and payment network rules; electronic contracting and mobile commerce; online banking; retail installment sales; preparing for examinations by the Consumer Financial Protection Bureau (CFPB); responding to CFPB supervisory requests (including so-called PARR letters); Article 9 of the Uniform Commercial Code; lease-purchase transactions and consumer protection laws, such as the Telephone Consumer Protection Act (TCPA), Truth in Lending Act (TILA), Fair Credit Reporting Act (FCRA), Equal Credit Opportunity Act (ECOA), Electronic Funds Transfer Act (EFTA), Electronic Signatures in Global, and National Commerce Act (E-SIGN); UDAAP statutes prohibiting unfair, deceptive, and abusive acts and practices; and the CFPB's Rule on Payday, Vehicle Title, and Certain High-Cost installment Loans (Payday Rule).

He also routinely counsels clients on issues related to online small business lending, electronic consents, contracts and disclosures, and recurring payment methods.

Earlier in his career, Jason served as lead in-house counsel to a premier consumer financial services company where he advised on an array of regulatory, legal, and compliance issues.

REPRESENTATIVE MATTERS

- Assisted multiple clients with drafting consumer-facing agreements, including payment authorizations and associated TILA disclosures for installment loan, line of credit, credit card, and buy now pay later programs.
- Conducted regulatory due diligence on card issuers, online-installment lenders, title lenders, timeshare/vacation sellers, small business lenders, and other entities focused on consumer financial services.

- Advised fintech and marketplace lending clients in establishing online loan operations, application flow processes, and bank programs.
- Counseled clients on loan programs and product structures.
- Advised clients on the application of state laws to bank model consumer and small business lending programs.
- Advised various fintech companies in structuring and drafting consumer-facing disclosures for their bank model consumer credit programs.
- Counseled multiple small dollar lenders on the CFPB Payday Rule and structured compliance programs with respect to same.
- Advised clients in implementing and structuring online timeshare and vacation finance origination processes.

AWARDS

- Thomson Reuters Stand-out Lawyer (2021-2025) – independently rated lawyers

TOP AREAS OF FOCUS

- Consumer Financial Services
- Consumer Law Compliance
- Financial Services
- Payments + Financial Technology

ALL AREAS OF FOCUS

- Artificial Intelligence
- Consumer Financial Protection Bureau (CFPB)
- Consumer Financial Services
- Consumer Law Compliance
- Fair Debt Collection Practices Act (FDCPA)
- Financial Services
- Payments + Financial Technology
- Point-of-Sale Finance
- Telephone Consumer Protection Act (TCPA)

PROFESSIONAL/COMMUNITY INVOLVEMENT

- American Bar Association, Business Law Section, Consumer Financial Services Committee; co-vice chair, Fair Access to Financial Services Subcommittee; staff editor, *Federal Regulation of Consumer Financial Services Treatise*
- Past Young Lawyer Liaison, Fair Access to Financial Services Subcommittee; past Young Lawyer Liaison, Committee Newsletter

EDUCATION AND CERTIFICATIONS

EDUCATION

- New York University School of Law, J.D., 2006, senior notes editor, (2005-2006); staff editor, (2004-2005),

- Ohio University, B.A., *cum laude*, 2002, Phi Beta Kappa, Golden Key International Honor Society

BAR ADMISSIONS

- New York
- Pennsylvania

COURT ADMISSIONS

- U.S. District Court, Eastern District of New York
- U.S. District Court, Southern District of New York

SPEAKING ENGAGEMENTS

- Speaker, "Federal Rulemaking and Enforcement – One Step Back and Two Steps Forward?" 2025 OLA Legal Issues Conference, February 11, 2025.
- Speaker, TPPPA 2023 Solving the Payments Puzzle Conference, September 12-14, 2023.
- Speaker, "High Risk Lending, Debt Collection, and Debt Settlement Company Update," TPPPA Conference, November 16-18, 2022.
- Speaker, "Eye of the ATR Hurricane? The Future of Ability to Repay in a Post-Recession World," Short-Term Loan Bar Association, November 12, 2021.
- Speaker, "Buy-Now-Pay-Later," San Francisco Bank Attorneys Association, November 8, 2021.
- Speaker, "Buy-Now-Pay-Later and Other Cutting-Edge Emerging Financial Products, Pennsylvania Bar Institute, October 21, 2021.
- Moderator, "One Click From Disaster: The Fair Lending Implications of Digital Targeted Marketing in a Big Data Word," ABA Business Law Section Annual Meeting, September 24, 2021.
- Speaker, "Texas Update: An Overview of the OCC's New CAB Regulations," Short-Term Loan Bar Association, November 13, 2020.
- Speaker, "Observing an Account, Foregoing Payment, and Failed Payment Transfers," Short-Term Loan Bar Association, November 13, 2020.
- Speaker, "Using RCC's After the FTC's Novel Payment Method Stipulated Order," Short-Term Loan Bar Association, November 12, 2019.
- Speaker, "CFPB Payments Rule Workshop," FISCA Annual Meeting, October 22, 2019.
- Speaker, "The Problem Payment Provisions of the CFPB Rule," CFSA Annual Conference and Expo," March 20, 2019.
- Speaker, "Compliance School," CFSA Annual Conference and Expo, March 19, 2019.
- Speaker, "The Ohio Contagion: HB 123 Impact and Industry Outlook," Short-Term Loan Bar Association, November 13, 2018.
- Speaker, "The Lead to Loan Lifecycle: Conducting Regulatory Due Diligence on Small-Dollar Lenders," CFSA Annual Conference and Expo, April 17, 2018.
- Speaker, "Compliance School, CFSA Annual Conference and Expo," April 16, 2018.
- Speaker, "Current Issues in Online Lending: Big Data and Machine Learning," American Bar Association, April 5, 2017.
- Speaker, "Fintech and Online Lending, OSBA Banking Law Institute," November 16, 2016.

PUBLICATIONS

- Podcast, "Point-of-Sale Finance Series: Understanding the Development and Regulation of Buy Now, Pay Later Products," *The Consumer Finance Podcast*, August 21, 2025.
- Podcast, "Point-of-Sale Finance Series: Unpacking Leases and RTO Models," *The Consumer Finance Podcast*, July 31, 2025.
- Podcast, "Regulatory Rollback: Legal Challenges and Opportunities in Earned-Wage Access," *The Consumer Finance Podcast*, July 24, 2025.
- Podcast, "From Banks to FinTech: The Evolution of Small Business Lending," *The Consumer Finance Podcast*, July 10, 2025.
- Podcast, "Point-of-Sale Finance Series: Banking on Lending Models," *The Consumer Finance Podcast*, July 3, 2025.
- Podcast, "Point-of-Sale Finance Series: The Great Debate of Loans vs. Credit Sales," *The Consumer Finance Podcast*, June 5, 2025.
- Podcast, "Explore the Impact of Point-of-Sale Finance in Our Upcoming Series," *The Consumer Finance Podcast*, June 3, 2025.
- Co-author, "CFPB Issues a Roadmap for States Days Before Trump Takes Office," *Consumer Financial Services Law Monitor*, January 15, 2025. Republished on *insideARM* on January 23, 2025, in their newsletter on January 27, 2025, and mentioned in this *insideARM* article on February 3, 2025.
- Co-author, "Unpacking CFPB's Unwieldy Buy Now, Pay Later Guidance," *Law360*, November 12, 2024.
- Podcast, "AI in Payments: Practical Applications and Legal Insights," *Payments Pros – The Payments Law Podcast*, October 30, 2024.
- Podcast, "Navigating the CFPB's Controversial Interpretive Rule on BNPL Products," *The Consumer Finance Podcast*, October 10, 2024.
- Co-author, "Finding the Balance: Complying with Consumer Finance Legal Obligations When Offering Patient Payment Plans," *Reuters* and *Westlaw Today*, October 3, 2024.
- Podcast, "Earned Wage Access: Exploring the CFPB's Proposed Interpretive Rule," *The Consumer Finance Podcast* and *Payments Pros – The Payments Law Podcast*, August 22, 2024.
- Podcast, "Loans, Retail Installment Contracts, and Refinancing Programs," *Moving the Metal: The Auto Finance Podcast*, August 13, 2024.
- Podcast, "Understanding the CFPB's Payday Loan Rule: Implications and Compliance," *The Consumer Finance Podcast*, August 1, 2024.
- Co-author, "Troutman Pepper Publishes 2023 Consumer Financial Services Year in Review and A Look Ahead," *Troutman Pepper*, February 1, 2024.
- Co-author, "Treasury Department Proposes to Clarify That On-Demand Pay and Earned Wage Access Programs Are Not Loans," *Troutman Pepper*, May 4, 2022.
- Co-author, "What's Going On? The CFPB Reassesses Its Rule Governing 'Payday, Vehicle Title, and Certain High-Cost Installment Loans,'" *American Bar Association Consumer Financial Services Committee Newsletter*, March 1, 2019.
- Co-author, "OCC Updates Examiner Guidance on "Deposit-Related Credit"," *National Law Review*, September 27, 2018.
- Co-author, Chapter 9, "Billing Error Resolution," *The Law of Truth in Lending 2018 Supplement*, American Bar Association.