

## Stephen C. Piepgrass

Partner

Richmond

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Stephen resolves investigations, inquiries, and disputes involving state attorneys general and other state and federal enforcement bodies. With a long track record and in-depth understanding of government actions, he helps clients address their most pressing challenges.

### OVERVIEW

Stephen leads the firm's Regulatory Investigations, Strategy + Enforcement (RISE) Practice Group, representing clients in single and multistate enforcement actions, including inquiries and investigations involving state attorneys general and other state and federal governmental enforcement bodies including the CFPB and FTC. He regularly represents clients in highly regulated sectors such as financial services, emerging technologies, health care, insurance, and education.

Stephen also leverages his extensive regulatory experience to assist clients in the gaming industry. He provides strategic guidance on navigating complex regulatory and permitting processes, developing new projects, and managing potential litigation. Stephen applies a thorough understanding of the rapidly-changing regulatory environment to his work with clients in the gaming space, helping clients with their compliance and fostering successful interactions with state and federal regulators.

As co-leader of the Incidents + Investigations team, Stephen advises clients on government actions and litigation arising from data breaches and other cybersecurity incidents. He combines first-hand knowledge of the government's priorities and processes with cyber experience to guide clients on all aspects of regulatory investigations into data incidents. Clients also facing parallel litigation involving the collection, security, use, and dissemination of consumer data regularly work with Stephen and his team for comprehensive solutions and risk mitigation strategies.

Stephen applies his wide-ranging experience with matters before government entities to counsel Troutman Strategies' clients on public policy, advocacy, and government relations issues. He is a recognized thought leader who provides ongoing analysis and commentary on regulatory developments on the firm's regulatory blog, Regulatory Oversight.

### REPRESENTATIVE MATTERS

#### State Attorneys General

- Representing a national managed health care company in a multistate attorneys general investigation.
- Representing a national delivery service in a state attorneys general investigation.
- Representing a national bank in investigations by state attorneys general in multiple states.
- Representing a private equity company in state attorneys general investigations based on entities in which the company has invested.
- Represented a financial services company in an investigation brought by the Colorado AG's office where the AG alleged our client violated the state's usury laws.
- Represented a data and information services company in interactions with state attorneys general and other regulators.
- Represented a loan servicer in interactions with state attorneys general and other state governmental bodies.
- Representing an international home service contract provider in interactions with state attorneys general and other state governmental and quasi-governmental bodies.
- Represented an international pharmaceutical company with respect to issues related to knock-off products before state attorneys general.
- Interact on behalf of client with national attorneys general associations, including the National Association of Attorneys General, the Republican Attorneys General Association, the Democratic Attorneys General Association, and the Attorneys General Alliance.
- Represented a group of alumnae who sued to prevent the closure of their college. Reached a successful mediated resolution resulting in an agreement to keep the college open under new leadership.

## **Gaming**

- Representing a payment processing company nationwide on licensing and regulatory issues.
- Obtained favorable attorney general opinions on the legality of sweepstakes games.
- Provided regulatory advice for the acquisition of horseracing and gambling facility.
- Drafted legislation on behalf of a local government to legalize and tax games of skill.
- Represent skill game companies in interpreting and complying with current laws and in developing laws relating to their business model.

## **Regulatory Privacy + Cybersecurity**

- Representing a national managed health care company in a multistate attorneys general investigation related to a data security incident.
- Representing various local government entities in response to data incident investigations.
- Represented a publicly traded company recognized as the world's leading cloud software provider, in a multistate attorneys general investigation, as well as subsequent matters related to FTC, HHS-OCR, and SEC investigations, stemming from a data breach.
- Advised on congressional inquiries regarding various data incidents.

## **Local Government Law**

- Advise local governments and other government bodies on responding to regulatory inquiries regarding cyber incidents.
- Represented and advised local government bodies on a wide range of issues, including government structure, boundary adjustments and disputes, annexations, consolidations, and disputes over utility service both inside and outside local boundaries.
- Advise clients dealing with zoning and land use issues.

- Represented local, state, and national campaigns, candidates, and government bodies dealing with election law issues, recounts, challenges to qualifications, and Voting Rights Act challenges.
- Defended local government bodies and individuals charged with civil and criminal malfeasance in office.

## AWARDS

- *Best Lawyers in America®*: Administrative / Regulatory Law (2024)
- *Legal 500 United States* for Government: State Attorneys General (2023-2025)
- *Lawdragon: 500 Global Leaders in Crisis Management* (2025)
- *Virginia Business*: “Legal Elite” in Administrative Government Legislative (2025)
- Rising Star, *Virginia Super Lawyers* (2010, 2013-2017)

## TOP AREAS OF FOCUS

- Consumer Financial Services
- Gaming
- Incidents + Investigations
- Regulatory Investigations, Strategy + Enforcement
- State Attorneys General

## ALL AREAS OF FOCUS

- Artificial Intelligence
- Better Business Bureau (BBB)
- Consumer Financial Services
- Election Law + Redistricting
- Enforcement Actions + Investigations
- Gaming
- Government + Regulatory
- Incidents + Investigations
- Land Use + Zoning
- Local Government Services
- Public Records/FOIA
- Regulatory Investigations, Strategy + Enforcement
- State Attorneys General
- Student Lending

## PROFESSIONAL/COMMUNITY INVOLVEMENT

- Member, Section of State and Local Government Law and State Attorneys General and Department of Justice Issues Committee, American Bar Association
- President (2014-2017), Board of Directors, Disability Law Center of Virginia Foundation
- Local Government Attorneys of Virginia

## PROFESSIONAL EXPERIENCE

- Summer law clerk, Hon. James H. Michael, Jr., U.S. District Court for the Western District of Virginia, 2003
- Communications director, U.S. Representative Mike Pence (IN-02), Washington, D.C., 2001-2002
- Deputy press secretary, U.S. Senator Sam Brownback (KS), Washington, D.C., 2000-2001
- Legislative correspondent, U.S. Representative Joseph R. Pitts (PA-16), Washington, D.C., 1999-2000

## EDUCATION AND CERTIFICATIONS

### EDUCATION

- University of Virginia School of Law, J.D., 2005, editor-in-chief, *Virginia Journal of International Law*
- Duke University, A.B., *cum laude*, 1999

### BAR ADMISSIONS

- Virginia

### COURT ADMISSIONS

- U.S. District Court, Middle District of Pennsylvania
- U.S. District Court, Eastern District of Virginia
- U.S. District Court, Western District of Virginia
- U.S. Court of Appeals, Third Circuit
- U.S. Court of Appeals, Fourth Circuit
- Supreme Court of the United States

## SPEAKING ENGAGEMENTS

- Panelist, "Perfecting Your Pitch: Helping New Practitioners Make the Case," The Government Investigations & Civil Litigation Institute's 11th Annual Meeting, November 12-14, 2025.
- Panelist, "Ethical Considerations in the Age of Generative AI," LGA Fall Conference, October 5, 2024.
- Co-presenter, "The Interaction of Public Records and Business Under FOIA," Local Government Attorneys of Virginia Spring 2023 Conference, April 20-22, 2023.
- Co-presenter, "AG Investigations: Navigating Unwritten Rules, Protecting Confidentiality, and Managing Class Actions Risks," Strafford Publication, Inc., November 29, 2022.
- Speaker, "Hot Button Issues and Trends in State and Local Enforcement," Hispanic National Bar Association Annual Conference and Convention, September 22, 2020.
- Co-presenter, "Election Law 101: Gearing up for 2021 Redistricting and the Basics of Electoral Board Representation," Local Government Attorneys of Virginia, Spring 2020 Conference, May 29, 2020.
- Co-presenter, "Declaratory Judgment Actions: Remedies," Local Government Attorneys of Virginia Fall 2019 Conference, October 24-26, 2019.
- Speaker, "Consumer Financial Services Outlook 2019," Troutman Sanders Webinar, February 12, 2019.
- Speaker, "Protecting Confidentiality When Sharing Information With Regulators," December 12, 2017.
- Co-presenter, "When Third Parties Come Uninvited: Tortious Interference and Covenants Not to Compete," Virginia Bar Association, 7th Annual Advanced Business Litigation Institute, September 24, 2016.
- Panelist, "Telemarketing Sales Rule and Third Party Payment Processors," Webinar, Third Party Payment

## PUBLICATIONS

- Co-host, Regulatory Oversight Podcast.
- Co-author, "2025 Mid-Year Review: State AGs in a New Era," *Troutman Pepper Locke*, July 25, 2025.
- Podcast, "State AGs Unite: New Privacy Task Force Signals Shift in Regulatory Power Dynamics," The Consumer Finance Podcast, May 15, 2025 and Regulatory Oversight Podcast, May 27, 2025.
- Co-author, "2024 State AG Year in Review," *Troutman Pepper Locke*, January 30, 2025.
- Co-author, "Consumer Protection: Understanding Enforcement Actions Brought by State Attorneys General," American Bar Association, 2024.
- Podcast, "What Financial Services Companies Need to Know in a Second Trump Administration," *The Consumer Finance Podcast*, December 12, 2024.
- Co-author, "2024 State AG Election Re-Cap: Where Things Stand the Day after Election Day," *Troutman Pepper*, November 6, 2024.
- Co-author, "Takeaways From Texas AG's Novel AI Health Settlement," *Law360*, September 27, 2024.
- Co-author, "Unique Aspects of Data Incident Response in Local Government," *American City & County*, March 1, 2024.
- Co-author, "California AG Announces Second CCPA Settlement. Asserting DoorDash Failed to Deliver Privacy," *Troutman Pepper*, February 29, 2024.
- Co-author, "That's a Wrap...or Not? Regulatory Data Incident Investigation Resolutions and the Path Forward," *Reuters* and *Westlaw Today*, February 14, 2024.
- Co-author, "2023 Privacy Year in Review," *Troutman Pepper*, February 1, 2024.
- Co-author, "2023 State AG Year in Review," *Troutman Pepper*, January 29, 2024.
- Co-author, "The Garden State Joins the Privacy Party," *Troutman Pepper*, January 24, 2024.
- Co-author, "FOIA Exemption Questions on Redacted HHS Cannabis Letter," *Law360*, January 5, 2024.
- Co-author, "Navigating the Complexities of Regulatory Data Incident Investigations," *Reuters* and *Westlaw Today*, December 12, 2023.
- Co-author, "Right to Repair: A Case Study for the Maturation of a Regulatory Issue," *CPI Antitrust Chronicle*, December 11, 2023.
- Co-author, "Green in a Gray Area: Lessons for Virginia Cannabis 'Gifting' Businesses," *Virginia Lawyers Weekly*, November 27, 2023.
- Co-author, "Your Organization Has Suffered a Data Incident: Now Here Are the Regulators It Will Likely Encounter," *Reuters* and *Westlaw Today*, October 16, 2023.
- Co-author, "Data Protection: One of These Incidents Is Not Like the Other," *Reuters* and *Westlaw Today*, August 24, 2023.
- Co-author, "Senate Proposal Opens the Door for More State Antitrust Lawsuits," *Troutman Pepper*, March 29, 2023.
- Co-author, "John Deere And Farmers Get Creative On 'Right To Repair'," *Law360*, March 2, 2023.
- Co-author, "2022 Regulatory Privacy Year in Review," *Troutman Pepper*, February 2, 2023.
- Co-author, "Preparing for an Era of Regulated Artificial Intelligence," *Law360*, January 25, 2023.
- Co-author, "State AGs Are Realizing Power of False Claims Statutes," *Law360*, December 8, 2022.
- Co-author, "Developing a Strategy for Settling Multistate AG Investigations," *Reuters*, November 10, 2022.
- Co-author, "Developing a Strategy for Settling Multistate AG Investigations," *Westlaw Today*, November 10, 2022.
- Co-author, "Tractor Hacking Newest Trick for Right to Repair," *Thomson Reuters Westlaw Today*, September 9,

2022.

- Co-author, "[Regulatory Investigation Red Flags That Signal Significant Risk for Companies](#)," *Reuters*, August 19, 2022.
- Co-author, "[FOIA in the Supreme Court of Virginia: A Mid-Year Update](#)," Local Government Attorneys *Bill of Particulars*, August 4, 2022.
- Co-author, "[FTC Makes Good on Its Promise to Ramp up Right-to-Repair Enforcement](#)," *Westlaw Today*, July 20, 2022.
- Co-author, "[CFPB Deputy Director Takes Aim at 'Rent-a-Bank Schemes'](#)," *Troutman Pepper*, June 22, 2022.
- Co-author, "[Preparing Companies for a New Day in Multistate AG Investigations](#)," *Reuters*, June 13, 2022.
- Co-author, "[Eight Republican AGs Express Concerns About Perceived Liberal Partisanship at NAAG](#)," *Troutman Pepper*, May 26, 2022.
- Co-author, "[Self-Regulation and Policymaking Guidance Regarding the Use of AI and ML](#)," *RTInsights*, May 10, 2022.
- Co-author, "[Ninth Circuit Provides Guidance on Web Scraping](#)," *Troutman Pepper*, May 5, 2022.
- Co-author, "[The Clash of Two Movements](#)," *Thomson Reuters Westlaw Today*, April 22, 2022.
- Co-author, "[State AG Cooperation on Opioids: A Model for Protecting Consumers](#)," *Reuters*, February 17, 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, "[States Attorneys General to Expand National Roles in 2022](#)," *Bloomberg BNA*, December 29, 2021.
- Co-author, "[California Passes CBD Law That Conflicts With FDA Guidance](#)," *Regulatory Oversight Blog*, October 12, 2021.
- Co-author, "[Technology as Protector: Challenges, Adaptations, and Best Practices for Remote Public Meetings During States of Emergency](#)," *Ensuring an Informed Public: State Open Records and Meetings Laws*, American Bar Association, August 27, 2021.
- Co-author, "[Regulators Likely to Focus on Hybrid Transactions and IoT Devices](#)," *Intellectual Property & Technology Law Journal*, July-August 2021.
- Co-author, "[It Could Be a Very Bitter Pill: US, Foreign, and State Antitrust Enforcement Agencies Launch Group to Change Traditional Analysis Applied to Pharmaceutical Mergers](#)," *Troutman Pepper*, March 16, 2021.
- Co-author, "[Republican AGs Likely to Challenge Biden on Multiple Fronts](#)," *Law360*, March 3, 2021.
- Co-author, "[State AGs Have a Decisive Role to Play in Election](#)," *Law360*, October 30, 2020.
- Co-author, "[How the State and Local Regulatory Landscape Is Expanding](#)," *Law360*, October 16, 2020.
- Co-author, "[The 'New' Enforcers: How States and Localities Are Changing the Landscape of Regulatory Authority](#)," *Troutman Pepper*, September 30, 2020.
- Co-author, "[Decennial Redistricting in Virginia's Localities](#)," Local Government Attorneys of Virginia, Spring 2020 Conference.
- Co-author, "[As Virginia Enters Phase 2 of COVID-19 Recovery, Groups Must Reassess Public Meeting Obligations](#)," *Richmond Times-Dispatch*, June 16, 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, "[Privacy Guidelines for COVID-19 Contact-Tracing App Makers](#)," *Law360*, April 17, 2020.
- Co-author, "[Public Meeting Requirements in the Age of COVID-19](#)," *Law360*, April 14, 2020.
- Co-author, Regulatory Landscape, "[2019 Consumer Financial Services Year in Review & A Look Ahead](#)," *Troutman Sanders*, February 24, 2020.



- Co-author, "Declaratory Judgment Actions: Remedies," Local Government Attorneys of Virginia Fall 2019 Conference, October 24, 2019.
- Co-author, "2018 Consumer Financial Services Year in Review & A Look Ahead," *Troutman Sanders*, January 28, 2019.
- Co-author, "Expanding Authority: How the Virginia Attorney General Has Used the Virginia Consumer Protection Act to Augment Its Reach," *VBA Journal*, Fall 2018.
- Co-author, "Federal Inaction and State Activity: Student Loan Edition," *Law360*, August 1, 2018.
- Co-author, "Tussling Over Preemption: Emerging Battleground Between State Authorities and Student Loan Servicers," *Business Law Today*, May 15, 2018.
- Co-author, "Expert Analysis: A Potential Shift on Education Debt Discharge Standards," *Law360*, March 9, 2018.
- Co-author, "Takeaways From Dismissed Challenge to Trump's CFPB Pick," *Law360*, February 26, 2018.
- Co-author, "Dish Network Decision Underscores Importance of Compliance With Regulatory Settlements and Associated Litigation Risks," *National Association of Professional Background Screeners Journal*, January/February 2018.
- Co-author, "Appointment of CFPB Director Causes Rift Among State AGs," *Law360*, January 25, 2018.
- Co-author, "Annual Report: 2017 Consumer Financial Services Year in Review and a Look Ahead," January 10, 2018.
- Co-author, "Recent Developments in Virginia Election Law of Interest to Local Government Practitioners," *Journal of Local Government Law*, Spring 2016.

## MEDIA COMMENTARY

- Quoted, "Why Polymarket Has Avoided Legal Pushback So Far," *Front Office Sports*, December 30, 2025.
- Quoted, "Schwab Executive Claims Prediction Markets Transformed Into Sports Betting Sites," *Yellow.com*, December 23, 2025.
- Quoted, "Charles Schwab CEO Rick Wurster Says Prediction Markets are '95% Sports Gambling'," *CasinoBeats*, December 22, 2025.
- Quoted, "Robinhood Shareholders Gleeful Over Firm's 'Prediction Market' Push, But State AGs Say It's Illegal Gambling," *Law.com*, November 4, 2025.
- Quoted, "NBA Betting Scandal Could Help Shape CFTC's Approach to Prediction Markets, Legal Experts Say," *Law.com*, October 30, 2025.
- Interviewed, "Are Sports Prediction Markets Legal? Attorney Stephen Piepgrass Weighs In," *CasinoBeats*, October 30, 2025.
- Quoted, "As One Prediction Market Leaves Nevada, Others Double Down," *The Nevada Independent*, October 29, 2025.
- Quoted, "Sports Gambling Indictment Revives Tough Questions About Integrity," *Axios*, October 23, 2026.
- Interviewed, "Sports Gambling Scandals Raise Concerns Over Game Integrity," *Axios*, July 31, 2025.
- Quoted, "Courier Ban Made Official By Texas Lottery, Legal Experts Weigh In," *PlayTexas*, April 29, 2025.
- Quoted, "Legal Experts Weigh In On Withheld \$83.5 Million Lotto Texas Jackpot Due To Courier Purchase," *PlayTexas*, April 22, 2025.
- Interviewed, "Sweepstakes Casinos: Thriving in an Ever-Changing Industry," *Casinoreviews.net*, February 17, 2025.
- Quoted, "Pa. Ag-Elect Likely to Target AI, Robocalls and Opioids," *Law360*, November 18, 2024.
- Interviewed, "Trends in iGaming, Cyber Security and Regulatory Developments," *Nasdaq Trade Talks*, November 13, 2024.
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Quoted, "Staring Down 'Enrollment Cliff,' Troutman Pepper Team Devises Strategy to Keep Schools Open," *The Legal Intelligencer*, June 27, 2024.

- Quoted, "Get Focused on Right-to-Repair," *Auto Dealer Today*, March 18, 2024.
- Quoted, "Privacy Corner: Troutman Pepper Aids Clients as Cyberattacks Rise," *FTCWatch*, March 12, 2024.
- Quoted, "Troutman Pepper Launches Team to Address Cyberattacks," *Law360 Pulse*, February 29, 2024.
- Quoted, "23andMe Breach Compounded by Theft of Ethnicity Data," *Corporate Counsel*, November 7, 2023.
- Quoted, "Warranty Claims Spike. Target Tesla After FTC Action," *National Law Journal*, April 13, 2023.
- Quoted, "Will Noncompete Ban Pave Way for Similar Assault on NDAs?," *Law.com*, January 25, 2023.
- Interviewed, "Interview With Stephen C. Piepgrass, Partner, LGA Annual Sponsor Troutman Pepper Hamilton Sanders LLP," *Bill of Particulars*, October 2022.
- Quoted, "Happy to Be Regulated? Fallout From BlockFi Settlement Is a Matter of Speculation," *Cointelegraph*, February 21, 2022.
- Quoted, "As AG Takes Wheel at HHS, Biden Faces Rocky Legal Road," *Law360*, March 19, 2021.