Taylor R. Gess

Associate

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Taylor partners with clients to provide business-minded regulatory advice and risk assessments on matters related to federal and state consumer credit, consumer protection, and payments/deposits laws.

OVERVIEW

Taylor provides practical advice on matters related to federal and state consumer finance, consumer protection, and payments laws, including those that apply to payment cards, deposit and prepaid products, lines of credit, installment loans, electronic payments, online banking, earned wage access, buy-now-pay-later transactions, retail installment contracts, rental-purchase transactions, and small business loans.

Taylor counsels a broad spectrum of clients, such as fintech companies, banks, payment card issuers, retail merchants, online lending platforms, and solar and home improvement finance companies, throughout the entirety of the product life cycle. This includes helping clients structure new products, develop compliance management systems, and maintain compliant practices for ongoing programs. This often involves navigating complex issues related to bank model lending programs, door-to-door sales, merchant/dealer risk considerations, fixture-secured loans, payment network rules, electronic contracting, telemarketing, unfair, deceptive, and abusive acts and practices (UDAAP), and military lending.

The federal laws Taylor primarily advises on include the Truth in Lending Act (TILA), Truth in Savings Act (TISA), Electronic Fund Transfer Act (EFTA), the Fair Credit Reporting Act (FCRA), the Equal Credit Opportunity Act (ECOA), the Telephone Consumer Protection Act (TCPA), and the Electronic Signatures in Global and National Commerce Act (E-SIGN). She also provides clients with actionable advice to address the web of state law issues that arise for consumer finance programs.

REPRESENTATIVE MATTERS

- Drafted consumer-facing disclosures and agreements for deposit, prepaid, credit card, line of credit, installment loan, credit sale, rent-to-own/lease, remittance transfer, earned wage access, and buy-now-pay-later products.
- Advised clients on the structuring and development of bank model consumer and small business lending programs, including related state law and electronic contracting considerations.
- Counseled clients in the home improvement and solar financing space on program structure, dealer risks, and door-to-door sales laws.
- Advised clients on federal/state laws and industry rules related to text message, phone call, and email

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marketing programs.

- Conducted regulatory due diligence on online lenders, card issuers, remittance transfer providers, merchants offering retail installment contracts, and sales finance agencies and small business lenders.
- Assisted clients, including those under CFPB supervisory jurisdiction, in drafting third-party service provider and merchant/dealer agreements.
- Counseled clients on credit reporting laws and data aggregation issues.
- Supervised fair lending testing for clients and assessed underwriting models and lending practices for fair lending risks.
- Advised clients on consumer protection issues, including subscriptions/automatic renewals, loyalty/rewards programs, and promotions.
- Advised clients on payment network rules and drafted payment authorizations.

AWARDS

- *Best Lawyers in America®: Ones to Watch:* Financial Services Regulation Law (2026-2027)
- North Star Lawyer, Minnesota State Bar Association, 2019-2020

TOP AREAS OF FOCUS

- Banking + Financial Services Regulation
- Consumer Financial Services
- Consumer Law Compliance
- Online Lending
- Payments + Financial Technology
- Point-of-Sale Finance

ALL AREAS OF FOCUS

- Artificial Intelligence
- Banking + Financial Services Regulation
- Consumer Financial Services
- Consumer Law Compliance
- 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; Young Lawyer liaison, Deposit Products and Payment Systems Subcommittee and Membership Subcommittee (2018-2024); staff editor, *Federal Regulation of Consumer Financial Services Treatise*.

EDUCATION AND CERTIFICATIONS

EDUCATION

- University of Minnesota Law School, J.D., *cum laude*, 2018, managing editor, *Minnesota Law Review*
- University of St. Thomas, B.S., *summa cum laude*, 2015

BAR ADMISSIONS

- Minnesota
- Pennsylvania

SPEAKING ENGAGEMENTS

- Speaker, "The Partnership Pitfalls Nobody Plans For: What to Avoid When Structuring a Bank-Fintech Program—and Where AI Automation Quietly Makes It Worse," LEND360 2026, October 12-14, 2026.
- Speaker, "Telephone Consumer Protection Act (TCPA) Basics," America's Credit Unions Regulatory Compliance Certification School 2025, April 21, 2025.

PUBLICATIONS

- Podcast, "Point-of-Sale Finance Series: Beyond Credit – Deposit Accounts, Prepaid Cards, Overdraft, and Surcharges," *The Consumer Finance Podcast* and *Payments Pros – The Payments Law Podcast*, October 22, 2026.
- Podcast, "Point-of-Sale Finance Series: Bank Charters, M&A, and Partnerships — Strategic Paths for Fintech and Payment Companies," *Payments Pros – The Payments Law Podcast*, September 23, 2026.
- Co-author, "FDIC Board Approves Proposed Rule on State Bank Parity," *Financial Services Blog*, September 21, 2026.
- Co-author, "Colorado Proposes Rules for Automated Decision-Making Technology and Chatbot Safety," *Consumer Financial Services Law Monitor*, August 14, 2026. Republished in *insideARM*, August 19, 2026.
- Podcast, "Rebalancing the Books: Employment Compliance for Financial Services Companies," *The Consumer Finance Podcast*, August 6, 2026.
- Podcast, "Point-of-Sale Finance Series: State AGs Filling the Federal Void in Point-of-Sale Finance Enforcement," *Regulatory Oversight Podcast*, July 29, 2026, and *The Consumer Finance Podcast*, July 16, 2026.
- Podcast, "Point-of-Sale Finance Series: Bank Charters, M&A, and Partnerships — Strategic Paths for Fintech and Payment Companies," *The Consumer Finance Podcast*, July 23, 2026.
- Podcast, "MLA and SCRA 103: Beyond Pricing — Non-Rate Protections, Enforcement Pitfalls, and Servicing Considerations," *The Consumer Finance Podcast*, July 9, 2026.
- Podcast, "MLA and SCRA 102: Pricing Constraints and the Complexity of Interest Cap Compliance — Servicemember Protections Explained," *The Consumer Finance Podcast*, June 25, 2026.
- Podcast, "MLA and SCRA 101: Servicemember Credit Protections and Compliance Risks," *The Consumer Finance Podcast*, June 11, 2026.
- Podcast, "CFPB's Reg B Final Rule: Disparate Impact Liability Out, Discouragement Standard Narrowed, and SPCPs in the Crosshairs," *The Consumer Finance Podcast*, May 21, 2026.
- Podcast, "Point-of-Sale Finance Series: Evolving Collection Rules Impacting Creditors," *The Consumer Finance Podcast*, May 7, 2026.
- Podcast, "Point-of-Sale Finance Series: Getting E-SIGN and UETA Right in Electronic Contracting," *The*

Consumer Finance Podcast, May 7, 2026.

- Podcast, "Point-of-Sale Finance Series: Fair Lending Risks at the Checkout Counter," *Payments Pros – The Payments Law Podcast*, April 23, 2026.
- Co-author, "House Bill Would Create New Federal Regime for Nonbank Payment Firms," *Financial Services Blog*, April 22, 2026.
- Podcast, "Point-of-Sale Finance Series: Evolving Collection Rules Impacting Creditors," *The Consumer Finance Podcast*, April 16, 2026.
- Podcast, "Point-of-Sale Finance Series: Fair Lending Risks at the Checkout Counter," *The Consumer Finance Podcast*, April 9, 2026.
- Podcast, "Point-of-Sale Finance Series: Privacy, Breaches, and Data Monetization," *The Consumer Finance Podcast*, February 19, 2026.
- Podcast, "Point-of-Sale Finance Series: The New Regulatory Reality for Small Business Financing and Trade Credit," *The Consumer Finance Podcast*, February 12, 2026.
- Podcast, "Point-of-Sale Finance Series: Federal Shake-Ups and the Rise of Income Share Agreements in Student Loan Financing," *The Consumer Finance Podcast*, February 5, 2026.
- Podcast, "Point-of-Sale Finance Series: Health Care Financing Compliance, Regulatory, and Privacy Pitfalls," *The Consumer Finance Podcast*, January 15, 2026.
- Podcast, "Point-of-Sale Finance Series: Door-to-Door Sales and Home Improvement Financing," *The Consumer Finance Podcast*, November 20, 2025.
- Podcast, "Point-of-Sale Finance Series: Navigating Home Improvement Finance Risks and Regulations," *The Consumer Finance Podcast*, November 6, 2025.
- Podcast, "Point-of-Sale Finance Series: Banking on Lending Models," *Payments Pros – The Payments Law Podcast*, October 29, 2025.
- Podcast, "Point-of-Sale Finance Series: Navigating Merchant and Dealer Contracting," *The Consumer Finance Podcast*, October 23, 2025.
- Podcast, "Point-of-Sale Finance Series: Understanding State Licensing for Nonbank Providers," *The Consumer Finance Podcast*, October 7, 2025.
- Podcast, "Point-of-Sale Finance Series: Innovations, Regulations, and Future Trends of Modern Credit Cards," *The Consumer Finance Podcast*, September 11, 2025.
- 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, "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.
- Co-author, "Troutman Pepper Publishes *2023 Consumer Financial Services Year in Review and A Look Ahead* ," *Troutman Pepper*, February 1, 2024.
- Podcast, "CFPB's Policy Statement on Abusiveness (Part 1)," *The Consumer Finance Podcast*, May 4, 2023.