Christina J. Grigorian

Partner and Deputy General Counsel

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Practices

FOCUS: Corporate

Class Action Litigation

Consumer Finance Litigation and Regulatory Compliance

Financial Markets and Funds

Privacy, Data and Cybersecurity

Industries

Finance and Financial Markets

Education

JD, University of Maryland Francis King Carey School of Law, *with honors*

MA, The George Washington University, *with honors*

BA, The George Washington University

Bar Admissions

Maryland

District of Columbia

Community Involvements

American Bar Association

Bar Association of the District of Columbia

Law360, Banking Editorial Board, 2024

Maryland State Bar Association

Washington National Cathedral, All Hallows Guild, President

When lenders or their capital sources need regulatory counsel about the lenders' compliance or operations, they turn to Christina Grigorian. Clients rely on Christina's thorough understanding of the complex regulatory environment in which lenders do business, as well as her practical approach to compliance and understanding of the broader consumer and commercial credit market. She advises banks, bank holding companies, and state-licensed consumer and commercial lenders, as well as providers of capital to consumer and commercial lending businesses, including those that offer their products and services on a "fintech" platform.

The regulatory advice lenders need to succeed

Christina's first priority when advising clients is to ensure that the products they offer or deals they fund comply with all applicable laws related to providing consumer or commercial credit in the US marketplace. For every client, she develops a thorough understanding of the operational, market and reputational challenges they face in order to provide the most actionable, practical compliance advice.

Christina finds solutions that allow her clients to finance transactions or conduct business with the assurance that all credit-related regulatory issues have been addressed. These are usually complex matters that demand painstaking attention to detail, while staying mindful of overarching business objectives and the market in which products will be offered.

One of Christina's most complicated transactions required more than six bank regulatory applications before it closed. That persistence is typical of her work, but so is the creativity that she has shown in advising clients on complexities related to business relationships that bring new products to market. In addition to her extensive work for lenders, she also conducts third-party consumer and commercial lender audits on behalf of capital sources.

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News

- Multiple Katten Partners Selected to Serve on 2024 *Law360* Editorial Advisory Boards (March 22, 2024)
- Christina Grigorian Featured in Structured Finance Association's WiS Week 2023 (April 3, 2023)
- Coronavirus (COVID-19) Resource Center (November 10, 2021)
- Christina Grigorian Talks Impact of Potential OCC Banking Charter for Payment Companies to *Bloomberg Law* (July 20, 2020)
- Katten Names New Partners (August 1, 2017)
- Claudia Callaway and Christina Grigorian Commented on Ransomware Attack Trends (March 9, 2016)
- Claudia Callaway and Christina Grigorian Quoted on Litigation Arising From Data Breaches (December 9, 2015)

Publications

- Financial Markets and Funds *Quick Take* (Newsletter) | *Author*
- Third Circuit Says Statutory Trusts are ‘Covered Persons' Under Consumer Financial Protection Act (March 22, 2024)
- NY Credit Card Surcharge Law Challenges Out-of-State Merchants (February 9, 2024)
- *Kattison Avenue/Katten Kattwalk* | Issue 3 (Winter 2024)
- The Latest Chapter in the Government's War on Purported "Junk" Fees: The CFPB Moves to Define Overdraft Services as Credit and to Cap Fee Amounts (January 19, 2024)
- New York Will Soon Require Merchants to Provide Additional Credit Card Surcharge Disclosures (January 17, 2024)

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- Privacy, Data and Cybersecurity *Quick Clicks* | Issue 11 (November 2023)
- New FTC Rule Requires Certain Financial Institutions to Report Loss of Unencrypted Customer Data (November 1, 2023)
- Junk or a Value-Added Service? Federal Regulators and the Biden Administration Go After "Junk" Fees (October 17, 2023)
- New State Laws Impact Licensing of Marketers of Bank-Originated Consumer Loans and Certain Special Purpose Entities That Hold Interests in Covered Consumer Loans (October 2023)
- CFPB, FTC Actions Show Consumer Terms Need Fresh Eyes (September 26, 2023)
- Privacy, Data and Cybersecurity *Quick Clicks* | Issue 9 (September 2023)
- CFPB Director Announces Intention to Propose Rules Targeting the Reliance on Non-Traditional Data Sources in Consumer Finance (September 8, 2023)
- New State Laws Impact Licensing Requirements for Consumer Loan FinTechs and Their Special Purpose Entities (August 8, 2023)
- Federal Court Grants Bankers' Requested Stay from Compliance with the CFPB's Small Business Data Collection Rule (August 3, 2023)
- CFPB's Focus on Standard-Form Consumer Agreements Warrants 'Fresh Eyes' on Consumer Template Disclosures (July 26, 2023)
- Is the CFPB Seeking to Expand the Definition of Credit and Its Regulatory Reach? The Bureau Sues Snap Finance and Asserts That Snap's Transactions are "Credit" Under Federal Law (July 26, 2023)
- Privacy, Data and Cybersecurity *Quick Clicks* | Issue 6 (June 2023)
- Is Your AI Intelligent Enough? The CFPB Says It Will Actively Police the Use of Chatbots and Warns of Risks (June 15, 2023)
- Bank/Fin-Tech Agreements: Re-Assessment Required Given New Regulatory Guidance on Third-Party Servicing Agreements (June 12, 2023)
- Mortgage Bankers Association Files Amici Brief in CFPB Constitutionality Case (May 30, 2023)

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- Bankers' Associations File Challenge to CFPB Small Business Data Collection Rule (May 24, 2023)
- Regulatory Interest in Fair Lending Spikes (May 18, 2023)
- Federal Trade Commission Releases Guidance to Merchants That Offer Buy Now/Pay Later (BNPL) Options to Customers (September 27, 2022)
- Federal Reserve's New Master Account Guidelines Provide Transparent Path For Crypto Industry (August 18, 2022)
- ADA Claims Continue to Snag Online Merchants (Summer 2022)
- The *Katten Kattwalk* | Issue 24 (Summer 2022)
- More California Invasion of Privacy Act Claims Expected Following Ninth Circuit Decision (June 10, 2022)
- FDIC Requires Reporting of Crypto-Related Activities (April 13, 2022)
- Utah Becomes Third State to Enact Smaller Commercial Transaction Disclosure Law (April 6, 2022)
- New York Department of Financial Services Alters Effectiveness Date of New Commercial Financing Disclosure Laws (January 3, 2022)
- New York Department of Financial Services Issues Proposed Rules Implementing Commercial Financing Disclosure Laws (September 30, 2021)
- CFPB Rescinds Short-Lived Guidance on Abusiveness Standard (March 18, 2021)
- PPP 2 LOANS —A Second Opportunity for Eligible Businesses to Obtain Forgivable Loans (January 11, 2021)
- The FDIC's Final Rule on Applications by Industrial Banks: A Formalized Road Map for FinTechs Considering a National Banking Platform (December 17, 2020)
- The CFPB's Debt Collection Rule: New Industry Requirements Will Assist Debt Collectors in Minimizing Litigation Risk (November 12, 2020)
- SBA Consent Requirements for M&A Transactions with PPP Loans (October 5, 2020)

- Colorado Establishes Safe Harbor for Bank/Fintech Lending Programs (August 19, 2020)
- Federal Courts Side With Strip Clubs in Opposing the SBA's Ineligibility Rules for the Paycheck Protection Program, Possibly Signaling a Broader Trend (June 5, 2020)
- Some Financial Businesses May Be Ineligible for the SBA's Paycheck Protection Program (April 8, 2020)
- CFPB Arbitration Rule Summary: Class Action Waivers Prohibited in Broad Range of Consumer Credit Transactions (July 11, 2017)
- Fintech Gains a National Platform: Federal Regulator Plans To Accept Fintech Applications for Special Purpose National Bank Charters (December 6, 2016)
- CFPB Issues Proposed Rule to Restrict the Use of Mandatory Arbitration Clauses and Class Action Waivers (May 16, 2016)
- *Health Care Perspectives* (March 2016)
- Recent Key Bitcoin and Virtual Currency Regulatory and Law Enforcement Developments (November 13, 2014)
- IRS Issues Pronouncement on Virtual Currencies (April 3, 2014)
- The FTC's Interim Final Red Flags Rule: What It Means for Non-Bank, Short-Term Consumer Lenders (January 11, 2013)
- Use Your Existing ESOP to Increase Bank Capital (March 16, 2010)
- Federal Reserve Makes it Easier to Invest in Banks and Bank Holding Companies (October 1, 2008)
- *Corporate & Financial Weekly Digest* (Weekly) | *Author*

Presentations and Events

- Chamber of Commerce v. CFPB: What Does the Decision Mean for Future CFPB Activity? | American Bar Association Antitrust Law Section (October 10, 2023) | *Presenter and Moderator*

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- Alternative Finance Bar Association (June 5, 2023) | *Presenter* | *Lessons From SVB and repercussions for Small Businesses*
- Navigating with CARES: Roadmap and Roadblocks to Getting Small and Mid-Size Business Loans Under the CARES Act (April 8, 2020) | *Panelist*
- SBA Loans Under the CARES Act in Response to COVID-19 (April 2, 2020) | *Speaker*
- Panel on FinTech Innovations and the Regulatory Environment (September 27, 2018) | *Panelist*
- CFPB Final Arbitration Rule: Class Action Waivers Prohibited in Broad Range of Consumer Credit Transactions (July 19, 2017) | *Presenter*
- PACE Financing: Consumer Financial Protections and Tax Considerations (May 17, 2017) | *Presenter*
- Corporate Governance: A Legal Checklist for Clean Tech Providers (April 12, 2017) | *Presenter*
- Solar Energy and Consumer Financial Protections (March 17, 2017) | *Presenter*
- Clean Tech and the OCC Special Purpose National Bank Charters for Fintech Companies (February 15, 2017) | *Presenter*
- Solar Focus 2016: Cracking the Code (November 16–17, 2016) | *Presenter* | *Consumer Finance Crossroads*
- Current Major Issues in Marketplace Lending: Regulatory and Securitization Perspectives (November 10, 2016) | *Presenter*
- The First 48 Hours: Responding to a Data Breach in 2015 (October 21–22, 2015) | *Panelist*
- The CFPB: A Q1 2015 Review (April 16, 2015) | *Presenter*
- Current Major Issues in Consumer Finance – ACH Processing Class Actions: What Banks and Small Lenders Need to Know (November 26, 2013) | *Presenter*
- CUNA Webinar (September 20, 2012) | *BSA Trends in Payment Systems*

- Community Financial Services Association Annual Conference (March 7–9, 2012) | *Speaker* | *Compliance School: What Every Lender and Lead Provider Needs When the CFPB Calls*
- Payday Loan Bar Association Annual Meeting (November 7, 2011) | *Getting Best Case Outcomes out of Worst Case Scenarios*
- Online Lenders Alliance Annual Meeting (October 10, 2011) | *Current Legal Issues in Online Lending*
- Republican Attorneys General Summer Meeting (June 6, 2011) | *Dodd-Frank and Consumer Finance*
- Online Lenders Alliance Spring 2011 Meeting (May 13, 2011) | *The Lawyers Speak: What Online Lenders Need to Know*
- Current Regulatory Issues in Consumer Finance: What Capital Sources Need to Know (April 28, 2011) | *Presenter*
- Community Financial Services Association Annual Conference (March 3, 2011) | *Speaker* | *Pick a Card, Any Card: Regulatory Environment for Prepaid Cards* | *The Mechanics of the Consumer Financial Protection Bureau*
- Community Financial Services Association Annual Conference (March 2, 2011) | *Recent Developments in Consumer Law*
- Current Major Issues in Consumer Finance (September 15, 2010) | *Presenter*
- Impact of the Dodd-Frank Bill on Consumer Lenders (July 27, 2010) | *Panelist*