

Christina J. Grigorian

Partner

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Practices

FOCUS: Corporate

Class Action/Consumer Finance Litigation

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

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

- 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

- Federal Trade Commission Releases Guidance to Merchants That Offer Buy Now/Pay Later (BNPL) Options to Customers (September 27, 2022)
- Financial Markets and Funds Quick Take | Issue 6 (September 15, 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)

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- 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)

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- 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

- 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*

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- 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*

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- 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*