



## Bonnie E. Dye

**Partner**  
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Bonnie Dye works with companies in the consumer lending space to manage the challenges presented by consumer finance regulatory requirements. Coast to coast, she provides regulatory compliance counsel on state and federal lending laws and state licensing laws applicable to consumer lending and mortgage companies, sales finance companies, brokers, and collection agencies. On behalf of fintechs and alternative lenders, Bonnie leverages her relationships with regulators and examiners to problem-solve legal issues relating to their business models.

Her deep understanding of state licensing law requirements informs her guidance to clients on obtaining licensure, maintaining compliance, and satisfying ongoing obligations, including annual reporting, renewal requirements, and reporting requirements triggered by company changes. She assists with state examinations and enforcement actions. She also regularly works with clients to alleviate challenges surrounding the Nationwide Multistate Licensing System and Registry (NMLS), the official system for companies and individuals seeking to apply for, amend, renew, and surrender licenses in some jurisdictions.

In addition, Bonnie advises on compliance with the Truth in Lending Act (TILA), prohibitions on unfair, deceptive or abusive acts and practices (UDAAP), and the Federal Trade Commission (FTC) rules and guidance—notably marketing and social media campaigns.

### Professional Affiliations

- American Bar Association
  - Business Law Section
  - Consumer Financial Services Committee
  - Banking Law Committee
- Association for Women Attorneys – New Orleans
  - Community Outreach Chairperson

### Honors & Awards

- Recognized on the Rising Stars list by *Louisiana Super Lawyers* magazine, 2016 – 2018, 2021 – 2022

### Practices

Consumer Financial Services  
Mortgage Servicing and Lender Litigation  
Regulatory and Compliance Counseling

### Industries

Automotive Finance  
Banking & Finance

### Education

J.D., Tulane University Law School, 2008  
B.S., *magna cum laude*, Louisiana State University, 2005

### Admissions

Louisiana  
New York



## Representative Matters

- Developed 50-state regulatory analyses of state licensing laws applicable to fintechs and bank partners offering open-end credit and/or closed-end loans in connection with consumer lending, servicing, and brokering activities.
- Guided consumer lenders from fintechs to banking institutions through state license reporting requirements triggered by company changes, including change of control, change of officers and directors, and change of address.
- Advised fintech and online lead generator clients on state advertising requirements and Truth in Lending Act (TILA)/Regulation Z, and UDAAP compliance with respect to marketing materials.
- Reviewed marketing program of fintech consumer lending platform in connection with its acquisition by financial services company. The review focused on the Truth in Lending Act (TILA)/Regulation Z, and UDAAP concerns applicable to open-end credit and closed-end credit products.
- Performed 50-state analyses of usury laws for licensed and unlicensed lenders originating unsecured, closed-end consumer installment loans, closed-end commercial loans, and open-end commercial loans for state regulatory compliance and for purpose of evaluating true lender risk.
- Navigated an online lending marketplace through a state examination involving issues of preemption of state usury laws applicable to banks.
- Advised real estate technology company on legal requirements applicable to maintaining state licensure, including net worth and surety bond requirements, ongoing reporting obligations relating to company changes, annual renewal, and reporting requirements.
- Assisted provider of home improvement financing to obtain and maintain consumer lender, sales finance company, and broker licenses.
- Devised 50-state survey of mortgage broker and mortgage lead generation licenses required for fintech startup company to engage in loan broker and lead generation activities at the company level for residential mortgage loans.
- Partnered with national mortgage lender and servicer to obtain de novo licenses for mortgage loan originators and branch locations in connection with the acquisition of the home lending division of a bank.
- Assisted client with multi-state sales finance company licensing project that enabled client to expand the availability of financing in the manufactured housing industry.
- Analyzed legal requirements applicable to an automobile financing company in connection with its unsecured and secured consumer lending business, including evaluation of permissible fees, required website disclosures, and restrictions with respect to transfer of loans.
- Assisted with 50-state state law analysis of licensing laws and authority to transact business from out-of-state location for captive auto finance company and state chartered industrial bank in connection with making consumer-purpose loans secured by motor-vehicles.
- Provided regulatory advice to a national bank client in connection with licensing requirements for the acquisition of commercial motor vehicle and equipment leases.
- Assisted credit unions with multi-state state legal analyses of licensing requirements in order to acquire retail installment contracts executed in connection with the sale of motor vehicles from dealers.
- Assisted student lender to obtain consumer lending licenses and ensuring ongoing compliance.
- Tracked state and federal legislative updates with respect to student loan servicer licensing and ombudsman requirements.

## Presentations

- Co-Presenter, "Consumer – State Law Updates," 2023 Auto Finance Seminar: Driving Ahead: Auto Finance Insights from Industry Leaders, Hinshaw & Culbertson LLP, Chicago, Illinois, May 4, 2023
- Co-Presenter, "Regulatory Considerations for Marketing and Advertising to Consumers," New Orleans Bar Association *By Young Lawyers, Procrastinators' Programs CLE For Young Lawyers*, New Orleans, Louisiana, December 14, 2022
- "Reviewing State Student Loan Servicing Licensing Laws – A Precursor to National Legislation?," National Council of Higher Education Resources (NCHER) 2020 Annual Conference, Virtual Event, November 12, 2020



## Personal

Outside of the office, Bonnie enjoys sharing new experiences with her husband and two kids, whether it is trying new recipes together, finding new hiking trails, or traveling near or far. Bonnie also co-owns a coffee shop, Café Bon Ami, in New Orleans' Central Business District.

## Community/Civic Activities

- New Orleans Women and Children's Shelter, Board Treasurer