

John ReVeal

Partner

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OVERVIEW

John ReVeal is a partner and a member of the Payments, Banking Regulation, and Consumer Financial Services practice group. He concentrates his practice on bank regulation, consumer financial compliance, and Bank Secrecy Act and anti-money laundering matters.

John routinely advises clients with respect to the following laws and regulations:

- Bank Secrecy Act
- Truth in Lending Act and Regulation Z
- Real Estate Settlement Procedures Act and Regulation X
- Equal Credit Opportunity Act and Regulation B
- Fair Credit Reporting Act and Regulation V
- Electronic Fund Transfers Act and Regulation E
- Truth in Savings Act and Regulation DD
- Consumer Leasing Act and Regulation M
- Consumer Privacy Provisions of the Gramm-Leach Bliley Act and state law equivalents

John also advises bank and nonbank lenders on state interest and usury matters, advises financial institutions regarding bank and savings association powers, federal preemption, and exportation of interest rates and fees, and assists clients in identifying lender licensing requirements and obtaining the necessary licenses.

John's Bank Secrecy Act work includes the development and implementation of enterprise-wide compliance management programs; enterprise-wide BSA/AML compliance programs; annual compliance and BSA/AML risk assessments; and assisting financial institutions in preparing for and responding to BSA/AML compliance examinations. John is a Certified Anti-Money-Laundering Specialist (CAMS).

PROFESSIONAL BACKGROUND

Prior to joining the firm, John was a partner at another international law firm. Prior to then, he was senior in-house consumer compliance counsel for a major federal savings association.

PROFESSIONAL / CIVIC ACTIVITIES

- Certified Anti-Money Laundering Specialist by the Association of Certified Ant-Money Laundering Specialists (ACAMS)

SPEAKING ENGAGEMENTS

- Speaker, 2018 Consumer Financial Services Symposium, 3 December 2018.
- Speaker, Scary Topics and Spooky Trends in FinTech Webinar, November 2018.

ADDITIONAL BACKGROUND

- Harvard Law School-Berkeley Law Exchange Program, 1989-1990

EDUCATION

- J.D., University of California, Berkeley School of Law, 1990
- B.A., University of Washington, 1987

ADMISSIONS

- Bar of District of Columbia

THOUGHT LEADERSHIP *POWERED BY HUB*

- 24 September 2026, New Proposed Risk Management Guidance
- 22 September 2026, FDIC Proposes Rule To Recognize Parity Between Out-of-State Banks and National Banks
- 25 June 2026, Customer Identification Requirements Proposed for Payment Stablecoin Issuers
- 15 April 2026, How CFPB Opinion Changes Earned Wage Access Definition, *Law360*
- 7 March 2026, FinCEN Relaxes the Requirements to Identify the Beneficial Owners of an Institution's Legal Entity Customers
- 12 January 2026, To Z or Not to Z? CFPB Clarifies the Regulation Z Treatment of Certain Earned Wage Access Products

- 10 October 2025, New FinCEN FAQs Clarify Certain SAR Filing Requirements
- 18 March 2025, Why Financial Institutions Should Stay the Course
- 17 March 2025, FinCEN Issues Geographic Targeting Order to Require Certain Money Services Businesses to File CTRs for Smaller Transactions
- 12 February 2025, Lessons From 2024 Anti-Money Laundering Enforcement Actions
- August 2024, Two Months Left: The FDIC's Proposed Brokered Deposit Rule - What You Need to Know
- 29 May 2024, South Carolina Becomes the Fifth State to Enact An Earned Wage Access Law
- 25 September 2023, Connecticut Stifles Employees' Access to Their Earned Wages
- 1 September 2023, New FTC Guidance: The INFORM Consumers Act's Impact on Online Marketplaces' Third-Party Sellers
- 22 May 2023, Does Your Marketplace Need to be "INFORM-ed" by 27 June?
- 9 February 2023, The CFPB Proposes New Credit Card Late Fee Limits
- 24 February 2022, The Impact of Overdraft Fees on Banks and Consumers
- 6 July 2021, Never Ending True Lender Uncertainty
- 15 January 2021, More Tools for AML Enforcement and More to Come: Key Considerations from the 2020 Anti-Money Laundering Act and the Corporate Transparency Act
- 6 October 2020, Trust Companies Face Increased Anti-Money Laundering Requirements
- 19 June 2020, The OCC'S ANPR on Digital Banking: Is this a Harbinger for Digital and Open Banking in the US?
- 15 June 2020, OCC Issues Final Rule to Fix Madden
- 21 May 2020, COVID-19: Its Impact on Banking, Fintech, and Payments: FAQs Part 2
- 19 May 2020, COVID-19: Understanding the Borrower Certification Requirements under the Paycheck Protection Program
- 13 May 2020, COVID-19: Emergency Regulations Do Not Pass Constitutional Muster
- 20 April 2020, COVID-19: The Massachusetts Attorney General's Office Issues Emergency Regulations Significantly Limiting Debt Collection in Massachusetts During Pandemic
- 14 April 2020, COVID-19: UPDATED Q&A for SBA Emergency Loans
- 8 April 2020, COVID-19: Impacts on Banking, FinTech & Payments: "Meet the Lawyers" Q&A Session
- 1 April 2020, COVID-19: Its Impact on Banking, Fintech, and Payments: FAQs
- 26 March 2020, COVID-19: UPDATED Q&A for SBA Emergency Loans

- 26 March 2020, COVID-19: Senate Includes SBA "Payroll Protection Package" Loan Relief to Small Businesses in CARES Act
- 29 January 2020, FDIC Proposes Brokered Deposit Relief
- 19 December 2019, The FDIC's Recent Brokered Deposit Rulemaking Might Provide Relief to the Prepaid Industry
- 7 November 2019, Proposed Regulations Under the California Consumer Privacy Act: Delivery and Content of Initial Notices and Disclosures
- 5 November 2019, Fintech Forward: How to Prepare for the California Consumer Privacy Act (CCPA) - Part 2
- 1 November 2019, Fintech Forward: How to Prepare for the California Consumer Privacy Act (CCPA) - Part 1
- 16 October 2019, California Governor Signs Limited Amendments to the California Consumer Privacy Act
- 15 October 2019, Proposed Regulations under the California Consumer Privacy Act
- 14 October 2019, Proposed Regulations Under the California Consumer Credit Privacy Act
- 14 October 2019, Proposed Regulations Under the California Consumer Credit Privacy Act
- 28 August 2019, The CFPB and the Fed Adjust Regulation CC for Inflation
- 27 August 2019, Lending to Consumers in the EU and United States
- 3 April 2019, Fintech Forward: The OCC FinTech Charter
- 10 January 2019, The FDIC Considers Modernizing its Brokered Deposit Rules
- 24 August 2018, The OCC's New Fintech Bank Charter - What you need to know
- 17 April 2018, Beneficial Owner New Account Rules: What FinTech AML Program Managers and Their Financial Institutions Need to Know
- 26 October 2017, Initial Coin Offerings: Key Considerations You Absolutely, Positively Need to Know About Before Launching an ICO
- 14 June 2017, Regulation CC Amendments Reallocate Risks of Remote Deposit
- 13 March 2017, CFPB Delays Prepaid Account Rule Effective Date

OTHER PUBLICATIONS

- "Staying The Course On Consumer Financial Law Compliance," *Law360*, 21 April 2025
- "Lessons from 2024 Bank Secrecy Act / Anti-Money Laundering Enforcement Actions," *The Banking Law Journal*, May 2025
- "Fintech Guide Overview," *Chambers & Partners*, 2019

- "Initial coin offerings: key US legal considerations for ICO investors and sponsors," *Journal of Investment Compliance (JOIC)*, Vol. 19, Issue: 1, June 2018

NEWS & EVENTS

- 15 June 2021, Fintech Meetup, hosted by Discover Global Network
- 6 March 2017, K&L Gates Continues Washington, D.C., Office Growth with Consumer Financial Services Partner Addition

AREAS OF FOCUS

- Payments, Banking Regulation, and Consumer Financial Services
- Anti-Money Laundering (AML)
- Fintech Lending

INDUSTRIES

- Banking
- Financial Services
- Fintech

REPRESENTATIVE EXPERIENCE

- Represent investors, investment firms, and other companies in the M&A process in executing regulatory due diligence on consumer financial services laws, including those implicated by companies offering payments, e-commerce, fintech, digital asset, and retail banking products.
- Advised depository, nondepository, and other financial services companies on the applicability of consumer financial services laws such as those governing tax refund anticipation loans, authorized agents and delegates for payment companies, check cashing, and escrow and lender licensing. Created surveys of such laws.
- Represented multiple startup clients in corporate and regulation work, including fintechs, stablecoin and NFT issuers, DAOs, DeFi protocols, custodial and noncustodial wallet providers, and mining companies.
- Advised digital asset exchange businesses on the implication of federal and state consumer financial services laws, securities laws, and commodity derivative laws.
- Counseled various cryptocurrency and fintech companies regarding laws related to payments and banking, including state "money transmitter" laws, federal anti-money-laundering and "money service business" laws,

the Electronic Funds Transfer Act and Regulation E, payment association rules, consumer credit laws, state gift certificate laws, state unclaimed property, state and card network surcharge rules, and escheat laws.

- Assisted a major bank with operating its card program, ensuring regulatory compliance of prepaid accounts as general-use cards, such as prepaid cards, gift certificates, and store gift cards. Also ensured compliance with laws particular to loyalty, award, or promotional gift cards. Drafted cardholder agreements and executed regulatory due diligence concerning disclosures, notices, marketing, and fees under Regulation E and FDIC rules.
- Represented an Indian bank in connection with a loan to a US technology company.