

# Stephanie Brooker

## Partner

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Washington, D.C.

Stephanie L. Brooker, a partner in Washington D.C. office of Gibson, Dunn & Crutcher, is Co-Chair of the firm's White Collar Defense and Investigations, Anti-Money Laundering, and Financial Institutions Practice Groups. Prior to joining the firm, Ms. Brooker served as a prosecutor at the U.S. Department of Justice. As a DOJ prosecutor, Ms. Brooker served as the Chief of the Asset Forfeiture and Money Laundering Section in the U.S. Attorney's Office for the District of Columbia, investigated a broad range of white collar and other federal criminal matters, tried 32 criminal trials, and briefed and argued criminal appeals. Ms. Brooker also served as the Director of the Enforcement Division and Chief of Staff at the U.S. Department of Treasury's Financial Crimes Enforcement Network (FinCEN), the lead U.S. anti-money regulator and enforcement agency.

During her approximately 25 years in legal practice, Ms. Brooker has been consistently recognized as a leading practitioner in the areas of anti-money laundering compliance and enforcement defense and white collar criminal defense. *Chambers USA* has ranked her and described her as an "excellent attorney," who clients rely on for "important and complex" matters, and noted that she provides "excellent service and terrific lawyering." Ms. Brooker has also been named a *National Law Journal* White Collar Trailblazer, a *Global Investigations Review* Top 100 Women in Investigations, and an NLJ Awards Finalist for Professional Excellence—Crisis Management & Government Oversight.

Ms. Brooker's practice focuses on internal investigations, regulatory enforcement defense, white-collar criminal defense, and compliance counseling. She handles a wide range of white collar matters, including representing financial institutions, boards of directors, multi-national companies, and individuals in connection with criminal and regulatory enforcement actions involving anti-money laundering (AML)/Bank Secrecy Act (BSA); sanctions; anti-corruption; digital assets and fintech; securities, tax, and wire fraud, foreign influence; work place misconduct; and other legal issues. She routinely handles complex cross-border investigations. Ms. Brooker's practice also includes BSA/AML and FCPA compliance counseling and deal due diligence and significant criminal and civil asset forfeiture matters.

Ms. Brooker's investigations matters involve multiple government agencies, including the Department of Justice (DOJ), Securities and Exchange Commission (SEC), Federal Reserve Board (FRB), Office of Comptroller of the Currency (OCC), Federal Deposit Insurance Corporation (FDIC), Office of Foreign Assets Control (OFAC), New York Department of Financial Services (NYDFS), Financial Industry Regulatory Authority (FINRA), state banking agencies and gaming regulators, and foreign regulators.

Ms. Brooker clerked for Judge Diana Gribbon Motz of the U.S. Court of Appeals for the Fourth Circuit and for Judge James Robertson of the U.S. District Court for the District of Columbia. She also worked in private practice as an appellate litigation associate at an international law firm.



## Capabilities

White Collar Defense and Investigations  
Administrative Law and Regulatory Practice  
Anti-Money Laundering  
Betting and Gaming  
Consumer Protection  
Crisis Management  
Financial Institutions  
Financial Regulatory  
Fintech and Digital Assets  
Litigation  
National Security  
Privacy, Cybersecurity, and Data Innovation  
Securities Enforcement  
Securities Litigation  
Securities Regulation and Corporate Governance  
Tech and Innovation  
Transnational Litigation

## Credentials

### Education

Georgetown University - 2001 Juris Doctor  
Northwestern University - 1996 Bachelor of Science

### Admissions

District of Columbia Bar

### Clerkships

US Court of Appeals, 4th Circuit, Hon. Diana Gribbon Motz, 2002 - 2003  
USDC, District of Columbia, Hon. James Robertson, 2001 - 2002

She graduated *magna cum laude* in 2001 from Georgetown University Law Center, where she served as Managing Editor of *Georgetown Law Journal* and was elected to the Order of the Coif. She graduated with highest distinction from Northwestern University with a B.S. in Journalism in 1996. She was also selected as a Harry S. Truman Scholar.

Ms. Brooker serves as Treasurer of the Board of Directors of the Robert A. Shuker Scholarship Fund. Ms. Brooker is admitted to practice in the District of Columbia.

#### Recent Representations

- Representing Binance, the largest global crypto exchange, in historic resolutions with the Department of Justice, FinCEN, OFAC, CFTC, and ongoing litigation with the SEC
- Representing Zoom in DOJ investigations and SEC investigation
- Representing Wells Fargo in sanctions resolutions with OFAC and the Federal Reserve Board
- Representing global bank in multiple anti-money laundering and corruptions investigations with DOJ, SEC, FinCEN, CFTC, and FINRA
- Representing global money transmitter in anti-money laundering investigations with DOJ and FinCEN
- Representing individual bank executive in DOJ anti-money laundering investigation
- Representing cryptocurrency companies in DOJ and FinCEN anti-money laundering investigations
- Representing Brazilian manufacturing company and CEO in DOJ sanctions investigation
- Representing public company in investigation by DOJ Public Integrity section, U.S. Attorney's Office, and state regulator involving public corruption and money laundering allegations
- Representing global bank in investigation involving allegations of money laundering, corruption, insider trading, and tax fraud by DOJ, SEC, and federal banking regulators
- Representing global bank in multiple fraud and anti-money laundering investigations by DOJ
- Representing global bank in money laundering and corruption investigation by foreign regulator
- Representing European bank Board of Directors in connection with DOJ and regulatory actions involving anti-money laundering, corruption, sanctions, and bank regulatory issues
- Conducting multiple sensitive internal investigations involving allegations of money laundering, sanctions, compliance lapses, and employee misconduct for CEO and Board of Directors of global financial institution
- Serving as strategic enforcement counsel for multi-agency DOJ and federal banking regulatory enforcement actions against national bank
- Serving as strategic enforcement counsel for major insurance company involving allegations of money laundering, fraud, and human trafficking
- Conducting independent investigation for Board of Directors involving workplace misconduct allegations against Chief Executive Officer
- Providing anti-money laundering compliance, DOJ compliance guidance, FCPA, and public company compliance advice, risk assessments, and corporate deal due diligence to approximately 50 client banks, broker dealers, digital assets and fintech companies, private equity and hedge funds, money service businesses, casinos, insurance companies, technology companies, hotels, and other multi-

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national companies

- Serving as outside anti-money laundering compliance and enforcement advisory counsel to two major trade associations in casino and crypto industries
- Serving as testifying expert for Canadian Government's Cullen Commission of Inquiry into Money Laundering in British Columbia
- Editor, ICLG International Publication, Anti-Money Laundering Laws and Regulations (2018-2024)
- Editor, Lexology, International Investigations (2024)

#### Recent Speaking Engagements

- ABA/ABA Financial Crimes Enforcement Conference, Advisory Board Member and Panel Moderator and Speaker (2017-2024)
- Securities Industry and Financial Markets Association, Regulatory and Examination Priorities, Anti-Money Laundering and Financial Crimes Conference (SIFMA) (2018, 2019, 2022)
- Institute of International Bankers Association, Supervisory Developments Regarding BSA/AML and OFAC Compliance (2016-2020)
- Association of Certified Anti-Money Laundering Specialists Annual Conference, How Compliance Officers Can Protect Themselves from Personal Liability from Anti-Money Laundering Issues (2023)
- Federal Bar Association, Key Trends in Sanctions Enforcement (2024)
- Association of Corporate Counsel, Key Trends in Crypto Enforcement (2024)
- Seton Hall Law School Gaming Bootcamp Anti-Money Laundering Panel (2022 and 2024)
- American Conference Institute, Digital Assets Enforcement Panel (2023)
- Verafin, Annual Bank Secrecy Act/Anti-Money Laundering Conference (2017 and 2021)
- Florida International Bankers Association (FIBA), "Lessons learned from the U.S. Treasury's recent enforcement actions against financial institutions in the region" (2017)
- Investment Adviser Association, Compliance Conference, AML Panel (2017)
- American Bar Association, Annual Institute on White Collar Crime (2018), Global Reach of Money Laundering Enforcement
- Gibson Dunn Annual Webcast: Bank Secrecy Act/Anti-Money Laundering and Sanctions Enforcement and Compliance Update (2018-2024)
- Gibson Dunn Webcast: DPAs, NPAs, and Monitorships (2019-2021)
- Gibson Dunn Webcast: Challenges in Compliance and Corporate Governance (2017 and 2018)

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