Stephanie Brooker

Partner

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Washington, D.C.



Stephanie L. Brooker, a partner in the Washington, D.C. office of Gibson Dunn, 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 the Treasury's Financial Crimes Enforcement Network (FinCEN), the lead U.S. anti-money laundering 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 and regulatory enforcement defense. She was most recently recommended by *The Legal 500* for her work in white collar defense and financial services-related matters. *Chambers USA* has ranked her in multiple investigations and enforcement defense categories and described her as an "excellent attorney," whom 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; DEI; anti-corruption; digital assets and fintech; securities, tax, and wire fraud, foreign influence; workplace 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 also has an active pro bono practice.

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 the 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

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
Labor and Employment
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

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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.

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 Bachelor of Science in Journalism in 1996. She was also selected as a Harry S. Truman Scholar.

Ms. Brooker is admitted to practice in the District of Columbia.

Recent Selected Representations

- Represented Binance, the largest global crypto exchange, in resolutions with the Department of Justice, FinCEN, OFAC, and CFTC, and litigation with the SEC.
- Representing Zoom in DOJ investigations and SEC investigation involving allegations related to China and securities fraud.
- Represented UBS in multi-agency resolutions with SEC, FINRA, CFTC, and FinCEN.
- Represented Wells Fargo in sanctions resolutions with OFAC and the Federal Reserve Board.
- Represented Wise in multi-state enforcement resolutions and Florida enforcement resolution.
- Represented AUS Merchant Services in DOJ resolution.
- Represented global company in DOJ Civil Rights investigation.
- Representing former prime minister in DOJ civil forfeiture action.
- Represented global bank in DOJ investigation involving allegations related to market manipulation and anti-money laundering. Achieved full declination of matter with no enforcement.
- Represented global financial services company in anti-money laundering investigations with DOJ and FinCEN.
- Represented global manufacturing company in DOJ investigation involving allegations related to sanctions and anti-money laundering. Achieved full declination of matter with no enforcement.
- Represented digital asset companies in DOJ and FinCEN anti-money laundering investigations.
- Represented Brazilian manufacturing company and CEO in DOJ sanctions investigation. Achieved full declination of matter with no enforcement.
- Representing global bank in DOJ and state criminal investigations involving allegations related to anti-money laundering and human trafficking.
- Representing global company in DOJ and multiple federal regulatory enforcement investigations involving allegations related to misuse of technology and artificial intelligence tools.
- Represented public company in investigation by DOJ Public Integrity section, U.S. Attorney's Office, and state regulator involving public corruption and money laundering allegations.
- Represented 20 individual executive and board member clients in multiple matters involving investigations by DOJ, FinCEN, OCC, Federal Reserve, and FDIC. Achieved full declination without enforcement in multiple matters.
- Represented European bank Board of Directors in connection with DOJ and regulatory actions involving anti-money laundering, corruption, sanctions, and bank

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regulatory issues.

- Conducted 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.
- Served as strategic enforcement counsel for major insurance company involving allegations of money laundering, fraud, and human trafficking.
- Conducted 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-national companies.
- Serving as outside anti-money laundering compliance and enforcement advisory counsel to two major trade associations in casino and digital assets industries.
- Served as testifying expert for Canadian Government's Cullen Commission of Inquiry into Money Laundering in British Columbia.
- Contributing Editor and articles author for multiple leading global publications on investigations and enforcement defense and anti-money laundering compliance topics.

Recent Speaking Engagements

Ms. Brooker is a frequent speaker at leading conferences and client events on a wide range of topics related to investigations; enforcement defense; government expectations of compliance programs; anti-money laundering and sanctions compliance; gaming; and digital assets.

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