Courtney M. Brown

Partner

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Washington, D.C.



Courtney M. Brown is a partner in the Washington, D.C. office of Gibson, Dunn & Crutcher, where she practices primarily in the areas of white collar criminal defense and corporate compliance. Courtney has experience representing and advising multinational corporate clients, boards of directors, and executives in internal and government investigations and enforcement actions on a wide range of topics, including anti-corruption, anti-money laundering, economic sanctions, financial and accounting, and tax fraud matters.

Courtney has been recognized as a leading lawyer by *Chambers USA* in the District of Columbia for Litigation: White-Collar Crime & Government Investigations. She has also been recognized in *The Best Lawyers in America*® guides for her work in Criminal Defense: White-Collar (2024-2026).

Courtney also counsels corporations on the effectiveness of their compliance programs and in connection with transactional due diligence, with a particular emphasis on compliance with anti-corruption laws, anti-money laundering regulations, and economic and trade sanctions administered by the U.S. Department of Treasury's Office of Foreign Assets Control.

Selected investigation and enforcement matters include:

- Represented a multinational information technology company in negotiating resolutions of claims brought by the U.S. Department of Justice ("DOJ") and Securities and Exchange Commission ("SEC") under the U.S. Foreign Corrupt Practices Act ("FCPA"), including successful completion of a post-resolution reporting period.
- Represented a global telecommunications company in a resolution with DOJ regarding non-criminal breaches of a Deferred Prosecution Agreement.
- Represented a financial services firm in negotiating a declination under DOJ's Corporate Enforcement Policy.
- Conducted an investigation for the Board of Directors involving allegations of insider dealing against executives.
- Representing a Special Litigation Committee of the Board of Directors of a pharmaceutical wholesale distribution and service provider in shareholder derivative litigation regarding Board oversight of the company's compliance program.
- Conducted a workplace investigation on behalf of a Special Committee of the Board of Directors.
- Represented an investment manager in an SEC investigation involving allegations of false advertising and securities regulations violations.

Capabilities

White Collar Defense and Investigations
Consumer Protection
Crisis Management
FDA and Health Care
Financial Institutions
International Trade Advisory and Enforcement
Litigation
National Security
Securities Enforcement

Credentials

Education

University of Chicago - 2008 Juris Doctor
Harvard University - 2003 Bachelor of Arts

Admissions

District of Columbia Bar

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- Represented a defense company, obtaining declinations of criminal and civil enforcement actions by the DOJ and SEC in FCPA investigations, as well as the dismissal of an employment lawsuit brought by a former employee.
- Obtained declinations, on behalf of a Fortune 500 company, of criminal and civil enforcement actions by the DOJ and SEC in a joint FCPA investigation arising from whistleblower complaints.
- Represented banks and asset managers in investigations by the DOJ, SEC, congressional committees, and state investigators relating to subprime mortgage matters and the Madoff fraud.

Courtney has participated in two government-mandated FCPA compliance monitorships and conducted anti-corruption and compliance trainings for in-house counsel and employees. Courtney also completed a secondment at a Fortune 100 company, where she advised global legal and business teams on compliance with anti-corruption laws.

Courtney received her law degree in 2008 from the University of Chicago Law School. Prior to law school, she worked for the Chairman of the U.S. Senate Health, Education, Labor and Pensions Committee. Courtney earned her undergraduate degree from Harvard University, where she was co-captain of the NCAA Division I championship women's crew team and an All-American selection in rowing. Courtney is a member of the bars of the District of Columbia and Virginia.

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