Jason J. Cabral

Partner

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New York



Jason Cabral is a partner in the New York office of Gibson Dunn, where he leads the firm's U.S. Bank Regulatory practice. He advises U.S. and non-U.S. banks and bank holding companies, credit unions, and financial technology and digital asset firms on complex bank and financial services regulatory matters. He helps clients navigate the U.S. regulatory landscape to launch products, execute transactions, and scale their businesses. His practice emphasizes core prudential regulation, alongside chartering, supervisory, and transactional matters. Jason is a member of the firm's Financial Institutions, Financial Regulatory, and Fintech and Digital Assets Practice Groups.

Jason's practice spans prudential regulatory matters, chartering and licensing, bank-fintech partnerships, mergers and acquisitions, strategic investments, supervisory and enforcement matters, and regulatory strategy. He regularly represents clients before the Federal Reserve, Office of the Comptroller of the Currency, Federal Deposit Insurance Corporation, Consumer Financial Protection Bureau, and state banking regulators. His experience covers key U.S. banking and financial services laws, including the Bank Holding Company Act, National Bank Act, Federal Deposit Insurance Act, Dodd-Frank Act, Bank Service Company Act, GENIUS Act, and other core banking statutes.

Jason has a leading practice in bank chartering and bank-fintech partnerships, including advising on the formation and conversion of banks and trust companies and structuring complex partnership models across deposit, lending, and payments products. Jason also regularly counsels clients on the development of new financial products and platforms, including real-time payments systems, stablecoins, tokenized deposits, and other digital asset-related services.

Regulatory and Compliance: Jason advises financial institutions and non-bank financial services providers on ongoing regulatory and compliance matters across the full lifecycle of their operations. He counsels clients on prudential regulation, corporate governance, supervisory expectations, and the design and implementation of compliance frameworks. His experience includes advising on:

- Federal and state banking and consumer financial services compliance, including prudential regulatory requirements.
- Core prudential regulatory requirements, including regulatory reporting, capital and liquidity requirements, affiliate transactions, brokered deposits, and activities and investments restrictions.
- Corporate governance and risk management frameworks, including board and committee oversight.
- Regulatory examinations, supervisory engagement, and remediation.
- Bank-fintech partnership oversight and third-party risk management.

Capabilities

Financial Institutions
Anti-Money Laundering
Artificial Intelligence
Consumer Protection
Financial Regulatory
Fintech and Digital Assets
Privacy, Cybersecurity, and Data Innovation
Public Policy
Tech and Innovation

Credentials

Education

Quinnipiac University - 2007 Juris Doctor
Ohio University - 2004 Bachelor of Science

Admissions

New York Bar
Connecticut Bar
Massachusetts Bar

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- Consumer compliance (e.g., Regulation E, Regulation Z, Regulation DD).
- Compliance frameworks for new products and services, including payments and digital asset-related activities.

Transactions & Strategic Investments: Jason represents financial institutions, asset managers, and investors on regulatory matters arising in connection with mergers, acquisitions, and strategic investments. His experience includes:

- Advising JPMorgan and affiliated investment funds on acquisitions, minority and non-controlling investments, and other strategic transactions, and related bank regulatory matters.
- Counseling global systemically important banks and affiliated investment funds on structuring investments under Section 4(c)(6) and the merchant banking authority of the Bank Holding Company Act.
- Advising a large sovereign wealth fund on regulatory matters associated with its change of control of a national trust bank in connection with the sovereign wealth fund's minority investment alongside private equity funds acquiring a multinational human capital management company.
- Advising publicly traded bank holding companies and underwriters on capital markets transactions and related regulatory disclosures.
- Representing hedge funds, private equity funds, venture capital funds, and asset management firms on regulatory matters associated with investments by or in banks and their holding companies.
- Representing banks and third-party service providers in the negotiation of core banking services, data processing, software, deposit sweep program, and third-party vendor contracts.

Charters & Bank-Fintech Partnerships: Jason advises banks, credit unions, fintechs, payments companies, and digital asset providers on evaluating and executing regulatory strategies for their businesses, including chartering, licensing, and partnership models. His experience includes:

- Advising on the formation and conversion of banks and trust companies, including national bank and trust charters and state-to-national conversions.
- Counseling banks and fintechs on the structuring of bank-fintech partnerships across deposit, lending, and payments products.
- Advising BitGo Bank & Trust, N.A. on its conversion from a South Dakota-chartered trust company to a national trust bank.
- Advising Zero Hash and Surus on the formation of North Carolina-chartered trust companies.
- Advising on real-time payments, stablecoins, tokenized deposits, and cross-border payments solutions.
- Advising Varo Bank, N.A. in obtaining a full-service, FDIC-insured national bank charter from the Office of the Comptroller of the Currency — the first consumer fintech company to be granted a full-service bank charter in the United States.*

Enforcement, Investigations & Litigation: Jason works closely with the firm's White Collar Defense and Investigations and Litigation practices in representing financial institutions and individuals in regulatory enforcement matters, investigations and litigation. His experience includes:

- Representing a bank executive in coordinated DOJ, OCC, and Federal Reserve investigations involving alleged anti-money laundering violations.
- Representing an international hedge fund in litigation involving the FDIC arising from the failure of Silicon Valley Bank.

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- Advising clients on regulatory obligations relating to confidential supervisory information in investigations and litigation.

Recognition

Jason has been recognized by *Chambers USA* 2026 in Financial Services Regulation: Banking (Compliance) and *The Legal 500 U.S.* in Financial Services Regulation – Banking (2025-2026) for his expertise in bank and financial services regulation. He also has been named to *Lawdragon's* 500 Leading Global Cyber Lawyers guide (2024-2026), which recognizes "world leaders in privacy, data, security, incident response, and the deals and lawsuits that revolve around all things Cyber."

Background

Jason began his career at a multinational law firm in New York and was previously a partner at a Boston-based national firm. Most recently, he was of counsel at a major law firm in New York.

He earned his J.D., *summa cum laude*, from Quinnipiac University School of Law, where he was a member of the Quinnipiac Law Review, and his B.S., *magna cum laude*, in Journalism from Ohio University.

* *Representation prior to Jason's association with Gibson Dunn.*

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