

Lauren Cook Jackson

Counsel

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Washington, D.C.

Lauren Cook Jackson is counsel in the Washington D.C. office of Gibson, Dunn & Crutcher. She practices in the firm's Financial Institutions, Securities Regulation and Corporate Governance, Securities Enforcement and Investment Funds practice groups.

Ms. Jackson's practice focuses on securities regulatory compliance and enforcement matters. She serves as regulatory compliance counsel to retail and institutional broker-dealers and investment advisers. She has also represented global financial institutions, public companies, broker-dealers, investment advisers, private fund issuers, swap dealers, and commercial commodities traders as well as other regulated entities and professionals in responding to examinations, investigations, and enforcement proceedings brought by securities regulators and self-regulatory organizations including: the SEC, CFTC, FINRA, NYSE, DOJ, OCC, CBOE, CME, NFA, NASAA task force groups, and state securities divisions and attorneys general.

Ms. Jackson regularly assists clients in conducting internal investigations into potential violations of state and federal securities laws and in identifying steps necessary to obtain compliance with such regulations, as well as self-reporting to securities regulators when required. She similarly has extensive experience designing and advising on the execution of large-scale remediation programs that balance the concerns and priorities of a firm's internal constituents, mitigate potential follow-on litigation risk, and fulfill the requirements of relevant regulatory undertakings.

Ms. Jackson graduated from the University of North Carolina at Chapel Hill in 2000 and received her law degree *magna cum laude* from the University of Richmond School of Law in 2008. She is admitted to practice in the District of Columbia and North Carolina.

Representative Matters*

- Represented multiple firms investigated and/or disciplined by SEC, FINRA, the CFTC and/or NFA for deficiencies relating to the preservation of required regulatory records by broker-dealers and swaps dealers in the prescribed form and manner (including that such records be kept in "WORM" format pursuant to SEC Rule 17a-4(f) and CFTC Rule 1.31). Assisted firms in conducting expansive remediation programs including top-down inventory of all required regulatory records, and the overhaul of related technology, governance and supervisory systems.
- Conducted internal investigation into potential violations of the Investment Company Act of 1940 in the pricing of certain mutual fund orders received by a brokerage unit of a Fortune 500 insurance and investment management company, coordinating the self-reporting of findings to FINRA and negotiation of favorable settlement terms for resolution of the matter and restitution to impacted investors.
- Managed a top-tier global financial institution's response to a complex regulatory



Capabilities

Financial Institutions
Financial Regulatory
Securities Enforcement
Securities Regulation and Corporate Governance
White Collar Defense and Investigations

Credentials

Education

University of Richmond - 2008 Juris Doctor
University of North Carolina - 2004
Bachelor of Arts

Admissions

District of Columbia Bar
North Carolina Bar

inquiry into the possible manipulation of key interest rate indices, including LIBOR, TIBOR, and EURIBOR, as well as investigations by the DOJ, CFTC, SEC, UK FSA, and EC, and conducted an internal investigation of the firm's corporate treasury, chief investment office, and six business lines in response to related civil and criminal inquiries and class action litigation.

- Represented one of the nation's largest independent broker-dealers in resolving multi-state investigations and subsequent global settlements regarding allegations relating to the sale of certain alternative investments, and compliance with so-called "Blue Sky" securities requirements.
- Represented one of the nation's largest broker-dealers in resolving dozens of separate enforcement matters relating to alleged violations of SEC Rule 15c3-5 (the Market Access Rule) and related exchange supervisory rules relative to trading on the NYSE, CBOE, NASDAQ, and Bats.
- Represented four of five broker-dealers in a NASAA task force sweep investigation into the supervision and state-registration status of retail brokerage sales assistants and in negotiating and executing subsequent global multistate settlements.
- Advised client's internal governance committee in reaching determinations regarding whether discipline imposed against associated persons during the annual incentive compensation review process and otherwise throughout the year required a reporting to FINRA pursuant to FINRA Rule 4530.
- Represented investment banking and retail brokerage businesses in response to DOJ, SEC, and state securities divisions' inquiry into the handling of information and treatment of different categories of customers relative to the initial public offering of a social media platform.
- Represented broker-dealer in negotiating an end to an ongoing administrative hearing, including a settlement that absolved individual executives of all sanctions sought, and provided favorable terms for the repurchase of outstanding auction rate securities.

**Includes matters handled prior to joining Gibson Dunn.*

Recent Speaking Engagements

- PLI's Broker/Dealer Regulation and Enforcement (2024, 2023, 2022)
- Securities Enforcement Forum West, The SEC's Active Rulemaking Agenda and its Impact (2024)
- PLI's Fiduciary Investment Advice and the Evolving Retail Investor Landscape (2022)
- PLI Fundamentals of Broker-Dealer Regulation (2021)
- NASAA Policy Symposium, Lessons Learned for Retail Investors from the GameStop Saga (2021)
- IAA, SEC Examination and Enforcement Update for Investment Advisers (2020)
- NASAA State Securities Regulatory Training, Effective Records Requests: An Industry Perspective (2024, 2023, 2022, 2019)

Publications

- Author of "Chapter 33A: Electronic Storage for the Retention of Required Regulatory Records, in the PLI Broker-Dealer Regulation (Second Edition) Treatise

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