Karin Thrasher Barry

Associate Attorney

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Karin Thrasher Barry is an associate in the Washington, D.C. office of Gibson, Dunn & Crutcher and a member of the FinTech and Digital Assets and Financial Regulatory Practice Groups. Her practice focuses on the representation of traditional financial institutions, non-bank financial services companies, and technology companies in various regulatory and transactional matters.

Karin received her law degree from University of Michigan Law School, where she served as the Notes Editor for the *Michigan Journal of International Law*. She also served as a research assistant for Adrienne Harris and Michael Barr, and was an extern at the United Nations Economic Commission for Europe in Geneva, Switzerland. Karin earned her Bachelor of Arts in Economics from University of California, Los Angeles.

She is admitted to practice law in the State of California and the District of Columbia.

Experience

Karin regularly advises leading financial technology, payments, and digital asset companies on complex regulatory, enforcement, chartering, and policy issues, with deep experience across product development, government investigations, and innovative financial services structures. A sampling of her experience includes:

Representative Payments and Lending Product Development Matters

- Counseling a multinational payment card services corporation regarding development of crypto and stablecoin-enabled payments products and related offerings in the U.S. and Latin America.
- Advising global rewards company in connection with expansion into the U.S. market, including compliance with the Federal Bank Secrecy Act, state money transmission licensing laws, state escheatment laws, state gift card laws, and other consumer protection laws.
- Advising investors on the applicability of ECOA and Regulation B to a target fintech company's products.
- Advising a telecommunications company on the applicability of state consumer lending laws.
- Counseling software company on the development of a factoring product outside the scope of lending laws.

Representative Government Investigation and Enforcement Matters

- Representing a global payments company in connection with an enforcement action brought by the Federal Trade Commission, including remediation of

Capabilities

Fintech and Digital Assets
Administrative Law and Regulatory Practice
Consumer Protection
Derivatives
Financial Institutions
Financial Regulatory
Privacy, Cybersecurity, and Data Innovation
Tech and Innovation

Credentials

Education

University of Michigan - 2021 Juris Doctor
University of California - Los Angeles - 2018 Bachelor of Arts

Admissions

District of Columbia Bar
California Bar

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allegations subject to consumer financial laws and regulations.

- Representing a global cryptocurrency exchange in connection with investigations by the DOJ and FinCEN and resolutions of enforcement actions brought by the SEC and OFAC.
- Representing a decentralized finance prediction markets platform in connection with an investigation by the CFTC and SDNY.
- Representing a peer-to-peer lending platform in connection with multi-agency enforcement action subject to state consumer lending laws.
- Advising a financial technology company on the applicability of GLBA and Regulation P in connection with a CFPB examination response.
- Advising a payments company on the scope of EFTA, Regulation E, and card network rules in connection with a CFPB enforcement action.
- Representing a payments company in connection with a multi-state enforcement action focused on Bank Secrecy Act compliance.

Representative Chartering Matters

- Advising Zero Hash, a crypto and stablecoin infrastructure platform, in the formation of Zero Hash Trust Company, a *de novo* North Carolina chartered trust company.
- Advising Surus, an institutional-grade asset management, custody, and compliance platform, in the formation of Surus Trust Company, a de novo North Carolina chartered trust company.
- Advising fintech company in the formation of a proposed *de novo* uninsured national trust bank.

Representative Policy Matters

- Advising food delivery platform in connection with congressional inquiry regarding financial services products in the gig economy.

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