Sara K. Weed

Partner

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Sara K. Weed is a partner in the Washington, D.C. office of Gibson Dunn and Co-Chair of the Fintech and Digital Assets Practice Group. Sara's fintech's practice spans both regulatory and transactional advice for a range of clients, including traditional financial institutions, non-bank financial services companies and technology companies.

Sara's outstanding achievements in private practice have been recognized by various organizations. Most recently, Sara was recognized as a leading lawyer in the 2026 edition of *Chambers and Partners* Fintech in the category USA: Nationwide – Fintech Legal: Payments and Lending, with clients describing her as "a very commercially-minded attorney with deep expertise and experience in navigating regulatory issues and relationships in the fintech space." The *Legal 500 US* 2025 guide recognizes Sara for her expertise in the area of banking. In 2024, 2025, and 2026, *Lawdragon* recognized Sara as one of their Leading Global Cyber Lawyers (Global Fintech, Digital Assets). In 2021, she was named a Rising Star in Fintech by *Law360*, and in 2018, she was shortlisted for the *Financial Times* Innovative Lawyers Award North America in the "Access to New Markets and Capital" category.

Prior to working in private practice, Sara held various roles in the financial services industry, including serving as in-house counsel to IBM's financial services group and as a policy counsel with a national financial services research organization. She also served as director and counsel with the North Carolina Office of the Commissioner of Banks, where she oversaw supervision of money services businesses, non-bank mortgage lenders, brokers, and servicers, and consumer finance companies.

Experience*

Sara's fintech practice provides support to clients throughout their life cycle, including: product development, regulatory strategy, including chartering, licensure and partnerships, supporting supervisory examinations and regulatory inquiries, regulatory diligence related to acquisitions, investments, and exit events, and the defense of regulatory enforcement actions.

Representative Payments and Lending Product Development Matters

- Advising a multinational consumer technology company in connection with the development of enhanced functionality to support digital wallet, payments, and lending use cases.
- Advising a business and financial software company in the development new payments products, including an accelerated tax refund disbursement product and cross-border invoicing product.
- Counseling a multinational payment card services corporation regarding development of crypto and stablecoin-enabled payments products and related

Capabilities

Fintech and Digital Assets
Administrative Law and Regulatory Practice
Anti-Money Laundering
Artificial Intelligence
Consumer Protection
Financial Institutions
Financial Regulatory
Privacy, Cybersecurity, and Data Innovation
Tech and Innovation
Technology Transactions

Credentials

Education

University of North Carolina - 2008 Juris Doctor

Admissions

District of Columbia Bar
Georgia Bar
North Carolina Bar

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offerings in the U.S., Latin America, and APAC.

- Representing a foreign neobank in the development of a peer-to-peer payments solution to be enabled in coordination with a blockchain technology company and U.S. regulated financial institution.
- Advising a blockchain technology company on commercial and regulatory matters in furtherance of the launch of a new digital asset-based cross-border payments product.
- Counseling a digital real estate closing platform in connection with the development of an embedded payments solution.
- Representing a blockchain technology company in connection with regulatory and commercial matters in support of a blockchain-enabled payments product.
- Advising multinational financial services firm in connection with the bank-sponsored program architected to support delivery of embedded digital payments.
- Advising social media platforms with respect to payments and consumer financial matters associated with creator monetization programs, marketplace offerings, reward programs, and platform tokens.
- 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 multinational card network in connection with the harmonization of global payment offerings following acquisition of payments business that previously competed with existing product offerings.
- Advising accounts payable automation software company in development of commercial loan product to succeed their flagship invoice factoring product.
- Advising global payments company in overhaul of cross-border customer funds management strategy.
- Advised human capital management company during the launch of a product that allows employees and contractors to access their earned wages in real-time.

Representative Government Investigation and Enforcement Matters

- Representing fintech companies in connection with examinations by the Federal Consumer Financial Protection Bureau, including remediation of allegations subject to consumer financial laws and regulations.
- Representing global cryptocurrency exchange in connection with enforcement actions brought by state banking departments following resolution of investigations brought by DOJ, the CFTC, FinCEN, and OFAC.
- Representing global payments company in resolution of claims brought by state banking departments following resolution of OFAC action.
- Representing global human capital management platform in resolution of claims brought by various state banking departments subject to state money transmitter and consumer lending licensing laws.
- Represented peer-to-peer lending platform in connection with multi-agency enforcement action subject to state consumer lending laws.

Representative Chartering Matters

- Advising Zero Hash, a cyrpto 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

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Carolina chartered trust company.

- Advised human capital management company in the formation of a *de novo* uninsured national trust bank that received approval from the OCC to open in 2023.

Representative Transactional Matters

- Advising Nubank in connection with its launch of a stablecoin product, in partnership with Circle, enabling Nubank customers in Brazil 24/7 access to USDC.
- Advising multinational card network in the potential acquisition of a global payments company and leading regulatory diligence spanning payments, AML, sanctions, export controls, and derivatives compliance in more than 40 jurisdictions of operation.
- Advised joint venture supporting fiat-backed stablecoins and development of a governed network.

Representative Crisis Management and Incident Response Matters

- Advising human capital management technology company with respect to remediation of payroll payments incident and related error resolution.
- Advising business and financial software company in remediation of escalated complaints and related engagement with National Automated Clearing House Association (Nacha).

Representative Policy Matters

- Advising global payments company in response to congressional inquiry in the aftermath of the failure of Silicon Valley Bank.
- Advising food delivery platform in connection with congressional inquiry regarding financial services products in the gig economy.
- Assisted a cryptocurrency exchange platform in the legislative process to amend the North Carolina Money Transmitters Act and enable crypto platforms to continue operating in the state.

**Includes work performed at a previous firm.*

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