

Stephanie Brooker



Stephanie L. Brooker, former Director of the Enforcement Division at the U.S. Department of Treasury's Financial Crimes Enforcement Network (FinCEN) and a former federal prosecutor, is a partner in the Washington, D.C. office of Gibson, Dunn & Crutcher. She is Co-Chair of the Financial Institutions Practice Group and a member of White Collar Defense and Investigations Practice Group. As a prosecutor, Ms. Brooker tried 32 criminal trials, investigated a broad range of white collar and other federal criminal matters, briefed and argued criminal appeals, and served as the Chief of the Asset Forfeiture and Money Laundering Section in the U.S. Attorney's Office for the District of Columbia. Ms. Brooker has been named a National Law Journal White Collar Trailblazer and a Global Investigations Review Top 100 Women in Investigations.

Ms. Brooker's practice focuses on internal investigations, regulatory enforcement defense, white-collar criminal defense, and compliance counseling. She handles a wide range of white collar matters, including representing financial institutions, multi-national companies, and individuals in connection with criminal, regulatory, and civil enforcement actions involving sanctions, anti-corruption, anti-money laundering (AML)/Bank Secrecy Act (BSA), securities, tax, and wire fraud, "me-too" matters, and other legal issues. She routinely handles complex cross-border investigations. Ms. Brooker's practice also includes BSA/AML and FCPA compliance counseling and deal due diligence and significant criminal and civil asset forfeiture matters.

Ms. Brooker's investigations matters involve multiple government agencies, including the Department of Justice (DOJ), Securities and Exchange Commission (SEC), Federal Reserve Board (FRB), Office of Comptroller of the Currency (OCC), Federal Deposit Insurance Corporation (FDIC), Office of Foreign Assets Control (OFAC), New York Department of Financial Services (NYDFS), Financial Industry Regulatory Authority (FINRA), state banking agencies and gaming regulators, and international regulators.

Ms. Brooker served as an Assistant U.S. Attorney in the U.S. Attorney's Office for the District of Columbia, where she served for many years as a trial attorney in Federal and Superior Court. In the latter part of her tenure, she served as the first Chief of the new Asset Forfeiture and Money Laundering Section. This Section was responsible for all asset forfeiture and money laundering issues in Criminal Division cases and for litigation of civil forfeiture cases. In this role, she investigated and prosecuted complex civil and criminal forfeiture cases involving high-priority enforcement areas, such as national security, sanctions violations,

and major financial fraud. She established the USAO's first DC Financial Crimes Task Force and supervised the investigation and prosecution of BSA and money laundering cases. During her tenure, she received the U.S. Attorney's Award for Creativity and Innovation in Management. She was also awarded three Special Achievement Awards for Superior Performance and the Office's Criminal Division Award.

Ms. Brooker also served as the first Director of FinCEN's Enforcement Division, which is the lead federal regulator with responsibility for enforcing the U.S. AML laws and regulations. In this role, she oversaw all of FinCEN's domestic and foreign enforcement and compliance under the BSA. She also oversaw rulemaking actions under Section 311 of the PATRIOT Act against foreign institutions and jurisdictions, Geographic Targeting Orders, and examination and enforcement actions against cryptocurrency companies following FinCEN's 2013 cryptocurrency guidance. Prior to serving as Enforcement Director, Ms. Brooker served as Chief of Staff and Senior Advisor to the Director of FinCEN.

Ms. Brooker clerked for Judge Diana Gribbon Motz of the U.S. Court of Appeals for the Fourth Circuit and for Judge James Robertson of the U.S. District Court for the District of Columbia. She also worked in private practice as an appellate litigation associate at an international law firm.

She graduated *magna cum laude* in 2001 from Georgetown University Law Center, where she served as Managing Editor of Georgetown Law Journal and was elected to the Order of the Coif. She graduated with highest distinction from Northwestern University with a B.S. in Journalism in 1996. She was also selected as a Harry S. Truman Scholar.

Ms. Brooker serves as Treasurer of the Board of Directors of the Robert A. Shuker Scholarship Fund. Ms. Brooker is admitted to practice in the District of Columbia.

Recent Representations

- Representing public company in investigation by DOJ Public Integrity section, U.S. Attorney's Office, and state regulator involving public corruption and money laundering allegations
- Representing public financial services company in investigation by SEC involving compliance and whistleblower allegations
- Representing public technology company in multiple DOJ investigations and SEC investigation involving securities fraud and foreign influence allegations
- Representing cryptocurrency company in multiple U.S. government enforcement agency and international regulatory investigations
- Representing global bank in investigation involving allegations of corruption, insider trading, tax fraud, and money laundering violations by DOJ Fraud Section, U.S. Attorney's Office, SEC, and federal banking regulators
- Conducting independent investigation for Board of Directors involving "me-too" allegations against Chief Executive Officer

- Representing global bank in investigations by multiple DOJ components involving fraud and money laundering
- Representing national bank in investigation involving sanctions allegations by DOJ, U.S. Attorney's Office, OFAC, and federal banking regulators
- Representing global bank in corruption and money laundering investigation by foreign regulator
- Representing European bank Board of Directors in connection with DOJ and regulatory actions involving FCPA, Libor, BSA/AML, and sanctions
- Representing Latin American manufacturing company in DOJ sanctions investigation
- Serving as strategic enforcement counsel for multi-agency DOJ and federal banking regulatory enforcement actions against national bank
- Serving as strategic enforcement counsel for major insurance company involving allegations of fraud, money laundering, and human trafficking
- Representing individuals in connection with Department of Justice criminal investigations
- Serving as outside compliance and enforcement advisory counsel to major trade association
- Representing broker dealer in connection with regulatory investigation by the Financial Industry Regulatory Authority (FINRA)
- Providing Bank Secrecy Act and anti-money laundering compliance advice and corporate deal due diligence to banks, broker dealers, private equity and hedge funds, non-bank financial institutions (i.e. money service businesses and casinos), insurance companies, technology companies, hotels, and other multi-national companies
- Conducting internal investigations for multi-national companies and financial institutions involving wide range of potential issues
- Representing clients in criminal and civil asset forfeiture matters

Recent Speaking Engagements

American Bar Association: "A New Regime of Transparency: Anti-Money Laundering Act of 2020, the Corporate Transparency Act, and Expansion of Cryptocurrency Reporting" (2021)

ABA/ABA Financial Crimes Enforcement Conference, Advisory Board Member and Panel Moderator and Speaker (2017-2020)

American Bar Association, Annual Institute on White Collar Crime (2018), "Global Reach of Money Laundering Enforcement



Gibson Dunn Webcast: DPAs, NPAs, and Monitorships (2019-2020)

Gibson Dunn Webcast: Anti-Money Laundering and Sanctions Enforcement and Compliance (2018-2020)

Gibson Dunn Webcast: Challenges in Compliance and Corporate Governance (2017 and 2018)

Institute of International Bankers Association, “Supervisory Developments Regarding BSA/AML and OFAC Compliance” (2016-2020)

Securities Industry and Financial Markets Association, “Regulatory and Examination Priorities,” Anti-Money Laundering and Financial Crimes Conference (SIFMA) (2018 and 2019)

Verafin, Annual Bank Secrecy Act/Anti-Money Laundering Conference (2017 and 2021)

Florida International Bankers Association (FIBA), “Lessons learned from the U.S. Treasury’s recent enforcement actions against financial institutions in the region” (2017)

Investment Adviser Association, Compliance Conference, AML Panel (2017)