



Representative Legal Matters

Amy Greer

- Represented a registered investment adviser in connection with an SEC Enforcement investigation, which arose following a periodic examination and was related to issues concerning implementation of the adviser's proxy voting policies and procedures. We were able to narrow the SEC's Staff's focus through the course of the investigation and successfully conclude the matter.
- Represented a formerly publicly traded technology company that provided a platform for the purchase of insurance products, charged with making false and misleading statements to investors related to customer complaints, steering the matter to a successful resolution with the SEC.
- Successfully represented a publicly traded regional bank in connection with an SEC investigation into its financial reporting, which was part of the Enforcement Division's Earnings Per Share initiative. We were able to convince the SEC Staff to close the matter without further action.
- Represented the co-founder and former CEO of a privately held San Francisco area data analytics company in a cutting-edge SEC investigation regarding alleged dissemination by the company of confidential information of public technology companies to its third party customers. The private company's disruptive business model allegedly involved incorporating confidential company data of its customers into its data analytics products sold to financial industry customers seeking "alternative data." In turn, these financial industry customers purportedly relied on this information when making trading decisions. In this matter of first impression, the SEC applied a traditional securities law regime, charging the company and our client with violations of Section 10(b) of the Exchange Act and Rule 10b-5, even though neither settling party either offered, sold or purchased any securities.
- Successfully represented a non-US member firm of one of the Big Four accounting groups in connection with a Public Company Accounting Oversight Board (PCAOB) Enforcement investigation related to an issue with the firm's e-learning training platform. The PCAOB staff closed the matter without action.
- Represented multiple investment advisers and dually registered investment adviser-broker dealer firms in connection with the SEC's share class selection disclosure (SCSD) self-reporting initiative. The SCSD initiative targeted the adequacy of disclosures by financial services firms of conflicts of interest when recommending mutual fund share classes that pay distribution fees (12b-1 fees) to the firms or their affiliates, when lower cost share classes are available.
- Represented a multinational brokerage and financial services company in connection with an industry-wide SEC investigation into "prereleased" American Depository Receipts (ADRs) and successfully negotiated a favorable settlement.

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- After successfully convincing FINRA not to proceed against her highfrequency, algorithmic market maker client, Amy steered that same client through negotiations with the SEC toward a successful resolution of claims that it had failed to fully disclose how it was executing trades for its broker-dealer clients.

Prior to joining the Firm, Amy handled the following matters:

Regulatory/Enforcement

- Represented multinational brokerage and financial markets technology firm in connection with Market Access Rule compliance investigations and negotiated favorable settlements with multiple regulators.
- Represented multiple investment advisers and dually registered investment adviser-broker dealer firms in connection with the SEC's share class selection disclosure (SCSD) self-reporting initiative. The SCSD initiative targeted the adequacy of disclosures by financial services firms of conflicts of interest when recommending mutual fund share classes that pay distribution fees (12b-1 fees) to the firms or their affiliates, when lower cost share classes are available.
- Successfully persuaded the SEC Staff to close investigation of highyield bond fund, its portfolio manager, bond trader, and chief compliance officer, in connection with Staff's review of pricing of trades in illiquid securities.
- Served as counsel to an investment adviser and its affiliated brokerdealer referred to SEC Enforcement following an OCIE examination, in connection with allegations that the adviser had failed to adequately disclose potential conflicts of interest arising from its mutual fund share class selection practices and receipt of mutual fund shareholder servicing fees. Successfully narrowed SEC focus to obtain a favorable settlement for the client.
- Represented several affiliated broker-dealer firms in connection with FINRA's investigation of sales practices and customer disclosures related to variable annuity products. We were able to obtain a favorable settlement for these clients, at a critical time in their businesses.
- Successfully persuaded SEC Enforcement to close an investigation of our investment adviser client, opened upon referral from an examination, related to Staff concerns about sales practices and potential conflicts of interest.
- Convinced SEC Enforcement to close its investigation of our global financial services client, which had been opened based on allegations by a putative whistleblower, asserting a variety of claimed securities laws violations.

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- After multiple referrals of examination findings were consolidated, successfully resolved SEC Enforcement matter charging multiple compliance failures and breaches of fiduciary duty by affiliated dual registrant firms.
- Represented a global financial services firm in connection with an SEC investigation into the firm's market making activities. related to the initial listing of securities that tracked certain cryptocurrencies, resulting in a successful settlement.
- Represented a large financial services firm in connection with an SEC investigation into trading in advance of the initiation of research coverage; the matter was closed with no action.
- Represented an individual client in investigation for potential violations of Regulation SHO and potential fraud and other claims, in connection with a complex options trading strategy. Convinced the SEC Staff to close the matter as to our client.
- Defended a major global financial institution in an SEC investigation into mortgage securitization and marketing practices and related financial reporting issues.
- Represented a registered representative in connection with a FINRA investigation of his broker-dealer's regulatory lapses, resulting in no action taken against the client.
- Represented the former retail broker-dealer entity of a major financial institution in a FINRA investigation into sales practices related to the sale of mutual funds, resulting in a favorable settlement.
- Defended a regional market making firm and its principal in an SEC/FINRA enforcement investigation concerning allegations of Regulation SHO violations, resulting in no action by the SEC and a favorable settlement with FINRA.

Internal Investigations

- Conducted significant internal investigation for financial services client related to issues discovered during company's annual internal compliance audit related to a defect in a technology application used for securities trading and other processes.
- Conducted an internal investigation for a trust company concerning the board's management of a potential securities law violation.
- Conducted an internal investigation for a healthcare company in connection with claims that personnel disclosed material nonpublic information.
- Advised a multinational client with its response to a DOJ grand jury investigation, which revealed that the client may have been the victim of a fraud perpetrated by certain employees and outside vendors. Conducted an internal investigation, assisted by the client's internal audit capability and an outside forensic accounting firm, and advised on disclosure issues.



- Represented a large financial services firm in connection with an SEC investigation into trading in advance of the initiation of research coverage.

Litigation

- Represented a mortgage originator/servicer/underwriter/issuer in a USD 10 billion residential mortgage-backed securities litigation, which was successfully settled.
- Favorably settled a private securities litigation and SEC enforcement action on behalf of the former CEO of a publicly traded medical services company in connection with allegations of financial fraud.
- Successfully represented a dissident shareholder group in proxy contest litigation, resulting in the annual meeting and director election going forward as scheduled and the dissidents all being elected to the board of directors