



Dorothy N. Giobbe

Counsel

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Related Services

Financial Services ■ Payments & Fintech ■ Consumer Financial Services ■ Bank Regulatory

Dorothy Giobbe works with the Payments & Fintech, Banking, and Consumer Finance teams, utilizing her background in consumer financial services and fintech to help clients navigate regulatory compliance issues and mitigate litigation investigation, and enforcement risks from federal and state regulators and private litigants. She counsels clients on compliance and risk mitigation strategies involving consumer financial products and services, including emerging payments, machine learning and artificial intelligence, blockchain and crypto assets, and biometrics. Her clients include both traditional financial institutions and fintech companies.

Dorothy was previously the executive director and assistant general counsel of emerging technology at a top global investment bank, providing counsel as a key advisor to the bank's leadership on emerging technology initiatives and spearheading legal engagement with state attorneys general in the consumer space. She also handled high-profile regulatory actions from state and federal regulators, including the Office of the Comptroller of the Currency, Federal Reserve Board, and Consumer Financial Protection Bureau. Additionally, she led a team of lawyers providing guidance to independent control functions, including compliance, risk, audit, and oversight and controls. She has also served clients at other international law firms.

Throughout her career, Dorothy has led and participated in numerous diversity and inclusion initiatives, including providing ongoing pro bono legal services to organizations that support diversity.

Representative Experience

Regulatory Advisory/Compliance Counseling

- Advising high-growth fintech companies on federal and state regulations for consumer credit-building products and services.
- Advising companies on design, structure, and ongoing compliance for consumer loyalty and prepaid card programs.
- Advised a major online gaming company on federal and state regulatory issues for Web3 products and services.
- Advised a leading U.S. emerging payments company on regulatory issues regarding tokenized payment instruments.
- Advised a major U.S. financial services company on consumer crypto asset product and service offerings.

Investigation/Enforcement and Litigation

- Counsel to the audit committee of a banking-as-a-service (BaaS) company regarding compliance practices.

- Advised on the consent order remediation compliance for a major financial institution in an action brought by the Consumer Financial Protection Bureau.

Transactional

- Drafted agreements for payment processing arrangements, vendor agreements, and advised on third-party risk management.
- Conducted due diligence reviews for mergers and strategic investments in emerging growth companies.

Professional & Community Engagement

- American Bar Association
- New York State Bar Association
- Association of the Bar of the City of New York
- Brooklyn Law School Alumni Admission Board
- Brooklyn Law School Alumni Access Program

Education

- Brooklyn Law School (J.D., 1999)
- Boston University (B.S., 1991)

Admitted to Practice

- New York