

Susan Light

Partner and Co-Chair, Broker-Dealer Regulation

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Practices

FOCUS: Financial Markets and Funds
Broker-Dealer Regulation
Financial Markets Litigation and Enforcement
Securities Litigation
White Collar and Internal Investigations

Industries

Finance and Financial Markets

Education

JD, Boston University School of Law
LLM, New York University School of Law
BA, University of Michigan, *with high honors*

Bar Admissions

New York

Court Admissions

US Supreme Court
US District Court, Southern District of New York
US District Court, Eastern District of New York

Community Involvements

American Bar Association
American Bar Foundation
Journal of Financial Compliance, Editorial Board
Journal of Securities Operations & Custody, Advisory Board Member
Law360, Securities Editorial Board, 2024
Securities Industry and Financial Markets Association

Susan Light offers clients a universe of insights gained over 30 years as a senior leader and regulatory officer inside both the New York Stock Exchange (NYSE) and the Financial Industry Regulatory Authority (FINRA). That experience and knowledge allows her to handle any securities regulatory problem that may confront broker-dealers and other financial services firms. She is particularly well suited to advise on complex investigations of securities law violations, including those involving firmwide supervisory failures.

Efficient solutions from a regulator's perspective

Sue represents large and small broker-dealers, as well as hedge funds, investment banks and other financial services providers. She helps these clients understand the regulatory landscape, design procedures to avoid regulatory problems and resolve investigations and enforcement actions. Sue's experience at the highest levels of the NYSE and FINRA is the difference that allows her to deliver quick, efficient answers and top-quality representation. And in matters that involve regulators, her extensive network of contacts allows her to successfully engage with them on her clients' behalf.

At FINRA, Sue served as senior vice president and chief counsel of enforcement, where she oversaw all aspects of investigations and disciplinary hearings involving a wide variety of FINRA rules and federal securities laws. She occupied a similar role at NYSE Regulation, Inc. before its merger and integration with FINRA, a process that Sue helped to lead. Her positions also involved working in conjunction with state, federal, foreign and other regulatory agencies in joint initiatives and investigations.

Outside of her work on investigations, she helps broker-dealers and other clients with their full range of regulatory issues. She frequently advises on anti-money-laundering, fraud, market manipulation, supervision, unauthorized trading, insider trading, net capital and margin regulations. Clients also seek her advice on business matters from compliance concerns with trading strategies to the development of social media policies. Other issues that she

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sees repeatedly include questions around rogue employees, cybersecurity, cryptocurrencies and whistleblower investigations.

Representative Experience

- While at FINRA:
 - Partnered with SEC Enforcement on dozens of global settlements involving microcap fraud, subprime, mutual fund revenue sharing, fee-based compensation, prearranged trading, and reverse convertibles.
 - Partnered with US Attorneys' offices on investigations and prosecutions involving subprime fraud, specialist interpositioning and Ponzi schemes.
 - Partnered with state financial regulators such as New York, New Jersey, Massachusetts, Connecticut, Arizona, Alabama, North Carolina, Kentucky and NASAA on investigations into sales practice abuses, after-hours trading and mutual fund market timing.
 - Partnered with the Municipal Securities Rulemaking Board (MSRB) on investigations involving minimum denomination transactions, political contributions, bribery and municipal short positions.
 - Partnered with IRS on investigations into improper tax dividends granted to offshore clients through complex stock loan and swap transactions, inaccurate allocation of partnership profits, and issuance of false W-2s.
 - Led FINRA enforcement actions in large fine settlements and high-profile disciplinary actions concerning net capital, customer protection and financial reporting; fraud, anti-money laundering and the Bank Secrecy Act; prospectus delivery and reporting; subprime assets; complex products such as leveraged ETFs, reverse convertibles and Puerto Rico bonds; trading-ahead violations; supervision of consolidated reports; and minimum contingency offerings, private placements and research reports.
 - Managed FINRA Enforcement sales practice investigations, litigations

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and appeals performed under contract for NYSE, Nasdaq, Cboe and other Exchanges.

- Partnered with foreign regulators on cross-national Ponzi schemes. Instructed other foreign regulators on implementing a securities regulation enforcement program.

Recognitions

Recognized or listed in the following:

- *Crain's New York Business*
 - Notable Women in Law, 2020
- DOJ
 - Recognition of Appreciation, 2015
- *The Legal 500 United States*
 - Recommended Attorney, 2021–2022
- US Department of Defense
 - Patriot Award, 2003
- YWCA
 - Women of the Year Award, 2002

News

- Multiple Katten Partners Selected to Serve on 2024 *Law360* Editorial Advisory Boards (March 22, 2024)
- Susan Light Guests on the *Oyster Stew* Podcast Discussing new SEC Rules for Market Participants to Become Registered (March 12, 2024)

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- Katten Represents Copy-Trading Platform dub in Seed Funding Round (February 23, 2024)
- Katten Honors Attorneys for Providing Pro Bono Services (October 30, 2023)
- Susan Light Speaks With *Financial Planning* About SEC's Proposed Overhaul of Best Execution Obligations (December 23, 2022)
- *Capital Forensics* Profiles Financial Markets and Funds Partner Susan Light (August 10, 2022)
- Katten Awarded Top Ranking in Structured Finance: Securitization in The Legal 500 United States 2022 (June 8, 2022)
- Coronavirus (COVID-19) Resource Center (November 10, 2021)
- Susan Light Talks With *Bloomberg Law* About the SEC's Recent Look at Insider Trading Rules (June 24, 2021)
- *FinOps Report* Discusses Broker-Dealer Crypto Custodian Options With Susan Light (June 23, 2021)
- Katten Receives High Marks in Derivatives, M&A and Securitization in The Legal 500 United States 2021 Guide (June 10, 2021)
- Susan Light Talks to *Financial Planning* About Problematic Oversight of Fraudulent Behavior in Wealth Management (March 15, 2021)
- Susan Light Discusses FINRA Probe Into Social Media Trading Frenzy With *Law360* (February 16, 2021)
- Susan Light Discusses GameStop Trader Violations With *The Wall Street Journal* (February 10, 2021)
- *Wolters Kluwer* Highlights Recent Katten "Business Not as Usual" Webinar (April 10, 2020)
- Three Katten Attorneys Named to Leading Women Lawyers List by *Crain's New York Business* (December 17, 2019)
- Susan Light Shares Insight on Goals and Mentorship With *The Glass Hammer* (October 21, 2019)

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- *Law360* Interviews Susan Light on PE Disclosure Regs (September 3, 2019)
- Susan Light Speaks With *Bloomberg Law*, *InvestmentNews* and *Law360* on "Extraordinary Cooperation" (July 16, 2019)
- Susan Light Cautions on Fees Related to 529 Plans (April 24, 2019)
- Susan Light Shares Insight on FINRA's 529 Plan Self-Reporting Initiative (March 11, 2019)
- Susan Light Featured in *The American Lawyer* (October 2, 2018)
- Former FINRA SVP and Chief Counsel for Enforcement Joins Katten (October 1, 2018)

Publications

- Financial Markets and Funds *Quick Take* | Issue 24 (March 14, 2024)
- SEC Significantly Broadens "Dealer" Definition (February 23, 2024)
- Financial Markets and Funds *Quick Take* | Issue 23 (February 2024)
- Financial Markets and Funds *Quick Take* | Issue 22 (January 2024)
- Financial Markets and Funds *Quick Take* | Issue 21 (December 14, 2023)
- Privacy, Data and Cybersecurity *Quick Clicks* | Issue 10 (October 2023)
- SEC Complaint Signals Aggressive Approach to Information Barriers Enforcement (September 29, 2023)
- Financial Markets and Funds *Quick Take* | Issue 18 (September 2023)
- FINRA Settles First Significant CAT Reporting Enforcement Action (September 7, 2023)
- FINRA Gains Greater Jurisdiction and Members: Amendments to SEC Rule 15b9-1 Will Require Most Proprietary Trading Broker-Dealers to Join FINRA (September 6, 2023)
- Recent DC Circuit Court of Appeals Case Brings FINRA to the Forefront of the SRO State Actor Controversy (July 17, 2023)

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- Privacy, Data and Cybersecurity *Quick Clicks* | Issue 3 (March 21, 2023)
- Financial Markets and Funds Quick Take | Issue 12 (March 17, 2023)
- Financial Markets and Funds Quick Take | Issue 10 (January 13, 2023)
- Financial Markets and Funds Quick Take | Issue 9 (December 13, 2022)
- Financial Markets and Funds Quick Take | Issue 8 (November 14, 2022)
- What's Up With WhatsApp? Regulators Recently Fine Firms \$1.8 Billion in Aggregate for "Off-Channel" Communications (October 21, 2022)
- Six Takeaways From FINRA's Revised Sanction Guidelines (October 14, 2022)
- Financial Markets and Funds Quick Take | Issue 6 (September 15, 2022)
- The SEC Remains in Search of and Is Looking for Finders (September 8, 2022)
- SEC Proposes to Clear-Up Clearing Agencies' Governance to Mitigate Directors' Potential Conflicts of Interest (August 29, 2022)
- Financial Markets and Funds Quick Take | Issue 5 (August 16, 2022)
- Broker-Dealer Proprietary Trading Groups: FINRA May Be In Your Future (August 15, 2022)
- SEC Deals New Proposal to Expand Reach of Dealer Registration Requirements (April 5, 2022)
- New and Familiar Compliance Challenges for FINRA Members in 2021 and What That Means for 2022 (March 3, 2022)
- Financial Services Industry Year in Review: Regulatory Enforcement and Litigation Trends in 2021 and Beyond (December 27, 2021)
- Market Trading Trends: Expect Regulatory Guidance to Accelerate (November 24, 2021)
- What does it all meme? An exploration of meme stock litigation, regulatory scrutiny and defenses for broker-dealers (August 11, 2021)
- SEC Enforcement Actions Highlight Regulatory Focus on Form CRS and Regulation Best Interest (August 6, 2021)

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- FINRA Clarifies Guidance on Best Execution and Payment for Order Flow (July 28, 2021)
- The SEC Clarifies Status of Institutional Family Offices for Purposes of Regulation Best Interest (March 22, 2021)
- Financial Markets Regulation COVID-19 Resource Center (October 22, 2020)
- SEC Proposal to Exempt Certain "Finders" from Broker-Dealer Registration May Allow Significant Capital Raising Activities by Non-Registered Persons (October 19, 2020)
- The Wait is Over: New York Department of Financial Services Files First Enforcement Action Under Cybersecurity Regulation (August 7, 2020)
- New York Proposes New Rules to Modernize Securities Filings Affecting Private Funds and Significant Exam and Registration Requirements on "Finders" (May 8, 2020)
- Business Not as Usual – COVID 19: US Securities and Derivatives Industry Regulators Provide Relief and Guidance (March 19, 2020)
- Amendments to FINRA New Issue Rules 5130 and 5131 Effective January 1, 2020 (January 9, 2020)
- FINRA 529 Plan Share Class Initiative encourages firms to self-report violations (August 3, 2019)
- SEC and FINRA Issue Joint Staff Statement on Broker-Dealer Custody of Digital Asset Securities (July 25, 2019)
- FINRA Releases New Guidance on Credit for Extraordinary Cooperation (July 17, 2019)
- Not So Secure: OCIE Identifies Regulation S-P Compliance Issues (April 25, 2019)
- FINRA 529 Plan Share Class Initiative Encourages Firms to Self-Report Violations (February 6, 2019)
- FINRA Publishes Its Annual Report on Examination Findings (December 20, 2018)

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- Assessing Cybersecurity Risks and Practices in the Broker-Dealer Industry (2017)
- Distributed Ledger Technology: Implications of Blockchain for the Securities Industry (2017)
- Dirty Money and Bad Luck: Money Laundering in the Brokerage Context (2008)
- *Corporate & Financial Weekly Digest* (Weekly) | *Author*

Presentations and Events

- Katten's First Impressions on the SEC's Amendments to The "Dealer" Definition (February 13, 2024)
- Expect More FINRA in 2024 – Proprietary Trading Firms Becoming FINRA Members and Other Broker-Dealer Regulatory Developments (February 8, 2024) | *Speaker*
- Katten's Annual Financial Markets and Regulation Crystal Ball — A Look Back at 2023 and a Look Forward to 2024 (February 1, 2024)
- Katten's Annual Financial Markets and Regulation Crystal Ball Event (January 19, 2023)
- Katten's Annual Financial Markets Litigation and Enforcement Symposium (October 13, 2022)
- FINRA, SEC and State Securities Enforcement Trends (August 2, 2022)
- Katten's Annual Financial Markets Regulation Crystal Ball — A Look Back at 2021 and a Look Forward to 2022 (March 8, 2022) | *Panelist*
- Katten's 2021 Financial Markets Litigation and Enforcement Symposium Series (November 18, 2021) | *Speaker* | *Market Trading Issues and Hot Topics*
- FINRA, SEC and State Securities Enforcement Trends (June 29, 2021) | *Panelist*

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- A Beacon Into 2021 Crypto Industry, Legal and Regulatory Developments Year to Date (June 2, 2021) | *Speaker*
- Katten's Annual Financial Markets Regulation Crystal Ball — A Look Back at 2020 and a Look Forward to 2021 (February 24, 2021) | *Panelist*
- Katten's Annual Financial Markets Litigation and Enforcement Symposium Series (October 15, 2020) | *Panelist* | *Hot Topics in Securities Regulatory Enforcement.*
- Thinking Outside the Tick Box: Why Compliance Training is the New Competitive Advantage (October 7, 2020) | *Speaker*
- A Brave New World: Effective Supervision and Compliance by CFTC and SEC Registrants in the New Business as Usual Environment (June 18, 2020) | *Panelist* | *Best Practices and Challenges to Address Going Forward*
- Market Correction Curriculum: Nontraditional ETFs (May 12, 2020) | *Co-presenter*
- How to Survive A Regulatory Inspection, With Special Focus on Form CRS and Regulation BI (May 7, 2020) | *Speaker*
- Practical Workshop on Complying With Regulation Best Interest (April 23, 2020) | *Panelist*
- Business Not as Usual: Practical and Regulatory Responses to COVID-19 for the US Financial Services Industry (March 12, 2020) | *Speaker*
- Katten's Annual Financial Markets Litigation and Enforcement Symposium (October 10, 2019)
- Breaking Down the SEC/FINRA Joint Statement on Custody of Digital Assets—No FUD as Long as You Don't HODL (July 24, 2019) | *Presenter*
- The Evolution of the Application of Law to Blockchain Technology and Cryptoassets: Where Have We Come From and Where Are We Going? (June 26, 2019) | *Panelist*
- Key Takeaways: SEC OCIE and FINRA 2019 Regulatory Priorities (February 19, 2019)

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- You've Been Hacked: Preventing and Dealing With Cyber Breaches (January 10, 2019) | *Speaker*
- Westchester NY Bar Association (2018)
- American Bar Association (2017)
- American Conference Institute (2017)
- RegEd Risk & Compliance Conference (2017)
- ACA Compliance Conference (2016)
- Broker Dealer Compliance Roundtable (2016)
- RegEd Risk & Compliance Conference (2016)
- FINRA Fixed Income Industry Conference (2015)
- SIFMA Conference on FINRA Hearings (2015)
- RegEd Risk & Compliance Conference (2015)
- Institutional Investors Roundtable (2015)
- New York Certified Fraud Examiners Conference (2015)
- RegEd Risk & Compliance Conference (2014)
- Pan- American Securities Finance Forum (2013)
- Beneficial Owners International Securities Lending Conference (2013)
- ALI ABA Independent Broker Dealer Legal & Compliance Forum (2013)
- Beneficial Owners International Securities Lending Conference (2012)
- FINRA Advertising Regulation Industry Conference (2012)
- ALI ABA Independent Broker Dealer Legal & Compliance Forum (2012)
- PLI Broker Dealer Regulation (2011)
- Beneficial Owners International Securities Lending Conference (2011)