

Lawyers



Andrea R. Tokheim

Of Counsel

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Andrea Tokheim is a member of the Firm's Financial Services Group, where she focuses on U.S. regulation of international and domestic banks. She advises on issues relating to organization structure, ownership and control issues, non-banking activities, affiliate transactions, and anti-money laundering compliance, including the USA PATRIOT Act. Ms. Tokheim has significant experience with the commodity trading-related activities of banking organizations and bank capital requirements. She has also advised clients on regulatory investigations and enforcement actions, including anti-money laundering concerns and consumer compliance matters.

Before joining the Firm, she was counsel in the legal division of the Board of Governors of the Federal Reserve System in Washington, D.C., where from 2004 to 2009 she focused on issues related to the Board's role as the primary federal regulator of U.S. bank holding companies and the U.S. operations of international banking organizations, as well as a wide variety of issues relating to the financial crisis. Ms. Tokheim was closely involved in the Board's decision to permit certain bank holding companies to engage in energy tolling and energy management activities. She also has significant experience with the "push-out" provisions of the Gramm-Leach-Bliley Act.

As a consultant to the International Monetary Fund, Ms. Tokheim led a short-term mission in the Cook Islands to review and advise on the country's banking laws.

PRACTICES & CAPABILITIES

General Practice

Financial Services

Bank Regulatory

FinTech

**Foreign Investments and
Trade Regulations**

EDUCATION

**2000, University of Virginia
School of Law, J.D.**

1995, Yale University, B.A.

BAR ADMISSIONS

District of Columbia

New York