

Truth in Testimony Disclosure Form

In accordance with Rule XI, clause 2(g)(5)* of the *Rules of the House of Representatives*, witnesses are asked to disclose the following information. Please complete this form electronically by filling in the provided blanks.

Committee: Financial Services

Subcommittee: _____

Hearing Date: 04/10/2024

Hearing Title :

Beyond Scope: How the SEC's Climate Rule Threatens American Markets

Witness Name: Robert Stebbins

Position/Title: Former General Counsel SEC

Witness Type: Governmental Non-governmental

Are you representing yourself or an organization? Self Organization

If you are representing an organization, please list what entity or entities you are representing:

No.

FOR WITNESSES APPEARING IN A NON-GOVERNMENTAL CAPACITY

Please complete the following fields. If necessary, attach additional sheet(s) to provide more information.

Are you a fiduciary—including, but not limited to, a director, officer, advisor, or resident agent—of any organization or entity that has an interest in the subject matter of the hearing? If so, please list the name of the organization(s) or entities.

No.

Please list any federal grants or contracts (including subgrants or subcontracts) related to the hearing's subject matter that you or the organization(s) you represent have received in the past thirty-six months from the date of the hearing. Include the source and amount of each grant or contract.

None.

Please list any contracts, grants, or payments originating with a foreign government and related to the hearing's subject that you or the organization(s) you represent have received in the past thirty-six months from the date of the hearing. Include the amount and country of origin of each contract or payment.

None.

Please complete the following fields. If necessary, attach additional sheet(s) to provide more information.

- I have attached a written statement of proposed testimony.
- I have attached my curriculum vitae or biography.

* Rule XI, clause 2(g)(5), of the U.S. House of Representatives provides:

(5)(A) Each committee shall, to the greatest extent practicable, require witnesses who appear before it to submit in advance written statements of proposed testimony and to limit their initial presentations to the committee to brief summaries thereof.

(B) In the case of a witness appearing in a non-governmental capacity, a written statement of proposed testimony shall include— (i) a curriculum vitae; (ii) a disclosure of any Federal grants or contracts, or contracts, grants, or payments originating with a foreign government, received during the past 36 months by the witness or by an entity represented by the witness and related to the subject matter of the hearing; and (iii) a disclosure of whether the witness is a fiduciary (including, but not limited to, a director, officer, advisor, or resident agent) of any organization or entity that has an interest in the subject matter of the hearing.

(C) The disclosure referred to in subdivision (B)(ii) shall include— (i) the amount and source of each Federal grant (or subgrant thereof) or contract (or subcontract thereof) related to the subject matter of the hearing; and (ii) the amount and country of origin of any payment or contract related to the subject matter of the hearing originating with a foreign government.

(D) Such statements, with appropriate redactions to protect the privacy or security of the witness, shall be made publicly available in electronic form 24 hours before the witness appears to the extent practicable, but not later than one day after the witness appears.

False Statements Certification

Knowingly providing material false information to this committee/subcommittee, or knowingly concealing material information from this committee/subcommittee, is a crime (18 U.S.C. § 1001). This form will be made part of the hearing record.

Robert Helburn

4/8/24

Witness signature

Date

ROBERT B. STEBBINS

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EXPERIENCE

Willkie Farr & Gallagher LLP, New York, NY

Partner (2001-2017; 2021-Present)

Associate (1993-2001)

- Co-head of the Corporate Governance practice group, focusing on governmental compliance and enforcement issues, corporate governance matters, internal and governmental investigations and advising boards of directors.
- Member of the Corporate & Financial Services Department, focusing on mergers and acquisitions, private equity and venture capital, investment funds, sports law and capital market transactions.

Securities and Exchange Commission, Washington, DC

General Counsel (2017-2021)

- Served as chief legal officer of the Commission and head of the Office of the General Counsel (“OGC”). OGC ranked as the fifth best place to work (out of 415 Federal government offices) in the 2018 Federal Employee Viewpoint Survey, as the 14th best place to work (out of 420 Federal government offices) in the 2019 Survey and as the 7th best place to work (out of 411 Federal government offices) in the 2020 Survey.
- Managed 145-person legal group responsible for, among other things, litigation on behalf of the agency, advising on rulemaking matters and enforcement actions, preparing Commission opinions in adjudications heard by the Commission, and providing legal advice to the Commission, to the Commissioners and to the Commission’s five divisions and 24 offices. During my tenure,
 - OGC litigated over 120 matters in the Federal appellate courts (including four cases in the U.S. Supreme Court), with the Commission being victorious in over 90% of these cases;
 - the Commission issued over 130 proposed and final rules, one of the busiest period of rulemaking in the history of the Commission;
 - the Commission brought over 2,750 enforcement actions and obtained over \$14 billion in disgorgement and penalties; and
 - the Commission issued over 50 opinions (each prepared by OGC) in adjudications heard by the Commission, without a single dissent by any Commissioner.
- Structured and supervised internal investigations, including as to the 2016 breach of the SEC’s EDGAR system.
- Provided briefings to Congressional committees and White House staff on various matters.
- Coordinated with Federal agencies (Office of Legal Counsel, Office of Solicitor General, Department of the Treasury, Federal Reserve, etc.) on interagency matters, including the work of the Financial Stability Oversight Council.
- Actively involved in restarting of the SEC Fellowship Program, with focus on hiring minority attorneys.
- Detailed to the Department of the Treasury during the spring of 2020 to advise on CARES Act implementation relating to air carriers, ticket agents, and national security businesses. In August 2020 received the Secretary of the Treasury’s Honor Award for this service.

EDUCATION

University of Pennsylvania Law School

Juris Doctor, May 1993

Central Michigan University

Bachelor of Science, *magna cum laude*, May 1988

Major: History; Minors: Finance and Economics

National Football Foundation and Hall of Fame Scholar Athlete, 1987

GTE Academic All-America Football Team, 1987

Mid-American Conference Academic All-Conference Football Team, 1984-1987

MISCELLANEOUS

Frequent speaker at law schools, conferences and continuing education seminars; Bar admissions: Supreme Court of the United States and the State of New York; Member, American Bar Association (M&A Committee) and New York City Bar Association (Securities Regulation Committee); Board of Advisors, Institute for Corporate Governance & Finance, New York University School of Law; Member, Society for Corporate Governance; Fellow, The American College of Governance Counsel; Former high school basketball coach and sports writer; Secretary, West Palm Golf Community Trust