



Petal P. Walker

SPECIAL COUNSEL

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Petal Walker counsels Financial Market Infrastructures (FMIs), banks and intermediaries, as well as innovators in the digital space, in meeting compliance obligations in a complex web of regulatory requirements. She advises companies on futures and swaps compliance and regulation and works closely with attorneys in banking, corporate and energy to deliver comprehensive, multi-faceted legal advice to clients. Ms. Walker rejoined WilmerHale in 2017 after serving as chief counsel for Commissioner Sharon Bowen at the CFTC, where she advised on policy and enforcement issues and served on the Market Risk Advisory Committee.

Ms. Walker also assists market participants by alerting them to the issues raised by, and helping them demonstrate compliance with, the requirements of the Dodd-Frank regulatory framework. Ms. Walker has rendered advice to CFTC registrants and end-users regarding the Dodd-Frank requirements in a number of areas, including reporting, mandatory clearing, product definition, segregation of customer funds, risk management and financial resource requirements. She also has enforcement and litigation experience, and has successfully assisted entities in responding to complex SEC and FINRA investigations.

As chief counsel for Commissioner Sharon Bowen at the CFTC, Ms. Walker advised Commissioner Bowen on a variety of significant derivatives-related issues, concerning FMIs—central counterparties (CCPs), exchanges, swap execution facilities and swap data repositories—including CCP resilience, recovery and resolution, equivalence, execution methods, algorithmic trading, and reporting requirements; intermediaries—including clearing members, swap dealers, and asset managers—on issues including portability, capital and margin, the de minimis requirement, and cross-border harmonization; and emerging technology market participants including issues such as FMI registration and the clearing obligation.

Further, as designated federal officer for the CFTC's Market Risk Advisory Committee, Ms. Walker had a central role in forming the committee, overseeing its direction, and managing a two-year process to adopt well-regarded recommendations for CCP resilience.

Prior to her three years at the CFTC, Ms. Walker was a senior associate at WilmerHale.

Professional Activities

Ms. Walker is a director on the Jumpstart DC Local Advisory Board as well as a member of the ABA Derivatives and Futures Law Committee Innovative Digitized Products and Processes Subcommittee; Derivatives, Securitization, and Project Finance Committee of the Corporation, Finance and Securities Section of the District of Columbia Bar Association; the Derivatives and Futures Law Committee of the Business Law Section of the American Bar Association; Women In Derivatives (WIND); and Women In Energy (WEN).

Solutions

Broker-Dealer Compliance and Regulation

Futures and Derivatives Regulation and Documentation

FinTech

Investment Management

Futures and Derivatives

Credentials

EDUCATION

JD, Harvard Law School, 2008

EdD, Harvard Graduate School of Education, 2007

MA, Comparative Education, Columbia University, 1999

BA, History, Yale University, 1995

summa cum laude, with Distinction

Phi Beta Kappa

ADMISSIONS

District of Columbia

Maryland

GOVERNMENT EXPERIENCE

Commodity Futures Trading Commission

Chief Counsel to the Commissioner