

Featured Alumni

Nancy Jacobson, Managing Counsel, Global Compliance and Ethics United Airlines

Tell us about your current role at United Airlines.

I handle compliance in anti-bribery, anti-corruption, sanctions, and US political law, including lobbying and political contributions. While these areas are distinct, they often overlap, especially when ensuring interactions don't cross into bribery. My day-to-day involves monitoring routine activities like government interactions, gifts, entertainment, political contributions, lobbying reports, and contract language related to anti-corruption and sanctions. I regularly approve and track these activities. I also conduct training globally, targeting high-risk regions or capitalizing on opportunities—such as sales meetings—where I can engage with teams. While we have mandatory online training, I focus on tailored sessions for specific functions or geographic risks, which I find highly rewarding. Lastly, I lead investigations when issues arise, though thankfully we haven't faced significant Foreign Corrupt Practices Act (FCPA) concerns since I've been here, which I hope reflects our strong compliance efforts.

How did the election cycle affect your work?

During election periods, we pay close attention to activities like sponsoring political conventions or making contributions to inaugurations. These actions require special scrutiny. Lobbying activity may also spike around key legislation, such as last year's Federal Aviation Administration (FAA) Reauthorization Act, which involved proposed changes. While some political engagement is tied to election cycles, some of it stems from specific legislation or issues impacting aviation.

What do you anticipate being the biggest legal challenges facing the airline industry in the coming years?

When thinking about the biggest legal challenges facing the airline industry in the coming years, there are a few key areas to consider. Environmental concerns, particularly around sustainable aviation fuel, could be impacted by shifting government support, depending on the administration in power. ESG issues, including lawsuits over "greenwashing," are also rising. Regulatory uncertainty, such as fluctuating consumer protection and antitrust laws, can create instability. Tariffs, especially in the cargo business, pose another risk, as changes in policy may impact costs. Additionally, supply chain disruptions, like delays with aircraft deliveries, can create compliance and operational risks. Finally, growing concerns around data privacy require proactive compliance, as evolving laws demand stronger protections for sensitive customer data.

How did your time at Jenner shape your career?

At Jenner, I worked on major internal investigations that were pivotal in shaping my skills for this role. These investigations often involved identifying compliance vulnerabilities and understanding

how things went wrong, such as gaps in data protection or access issues. This broad, cross-departmental work gave me valuable insight into how companies operate, which has been crucial for understanding an airline's operations. It also provided opportunities to collaborate closely with in-house counsel, helping me understand their role. I still maintain relationships with some of these former in-house colleagues as I transitioned into my current role at United.

You were one of the first partners to join Jenner's London office. What was that experience like?

When I joined Jenner's London office, it was an exciting time and felt like a startup environment with a strong sense of enthusiasm and commitment to building something great. People were eager to be a part of Jenner & Block, and there was a genuine sense of positivity around the firm. During my first year, a lot of my efforts were focused on introducing Jenner & Block to the London legal community and establishing key connections. These efforts paid off, as I recently received positive feedback from a London white collar lawyer at another firm, who remembered Jenner's strong presence in that first year, despite the office's small size. Though the initial impact didn't always lead directly to business, I hope it laid the groundwork for the office's later success. It was a rewarding experience to be the firm's "face" in London, and I also grew to appreciate the city, especially its live Shakespeare performances.

What were some of the most memorable or rewarding cases you worked on during your time at Jenner?

I enjoyed working on cases related to product development and manufacturing issues, particularly when things went wrong—as they generally had if we were involved. It was fascinating to piece together the history of a client's problem, and understand the combination of incentives and behavior that led to it. These types of cases raised questions about knowledge, awareness, and the complexities of production. I learned a lot about what companies need in place to prevent problems and how communication failures can contribute to such issues. I also appreciated the challenge of coordinating across departments like legal, manufacturing, and sales.

What career advice do you have for Jenner alumni, as well as current members of the firm?

One piece of advice I would offer to those considering transitioning from the firm is to think carefully about the job they want and what they enjoy about their current role at Jenner. For example, if someone loves being in the courtroom and enjoys being on their feet, moving in-house might not be the best fit. In-house litigation roles often involve supervising outside counsel, so you may not get the courtroom experience you're accustomed to. For me, moving in-house has been really rewarding, as it aligns with my interest in compliance and strategy implementation. That said, it's important to think broadly about your options, which can—in addition to in-house roles—include smaller firms, government positions, or even non-profits. Non-profit roles are highly competitive, so my advice for those would be to engage in relevant work throughout your career at Jenner, as well as to build relationships through pro bono work and board memberships. Lastly, transitioning in-house requires quickly learning new areas of law and relying on trusted outside counsel for guidance, so choose your outside counsel wisely.

