

John W.F. Chesley

Partner

jchesley@gibsondunn.com

T: +1 202.887.3788

Washington, D.C.

John Chesley is a litigation partner in Gibson Dunn's Washington, D.C. Office. He focuses his practice on white collar criminal enforcement and government-related litigation. He represents corporations, board committees, and executives in internal investigations and before government agencies in matters involving the Foreign Corrupt Practices Act, procurement fraud, environmental crimes, securities violations, sanctions enforcement, antitrust violations, and whistleblower claims. He also has significant trial experience before federal and state courts and administrative tribunals nationwide, with a particular focus on government contract disputes.

John served as the Interim Chief Ethics & Compliance Officer of a publicly-traded, multi-national corporation, responsible for managing a global team of compliance personnel. In this role, John conducted and oversaw internal investigations, managed a whistleblower hotline, provided compliance advice, created and updated compliance policies, and administered compliance training for tens of thousands of employees worldwide. This opportunity provided John with first-hand insights into the day-to-day challenges experienced by in-house counsel, which he uses to bring practical solutions to the table for all of his clients.

John has been recognized repeatedly as one of the leading lawyers of his generation. Specifically, he was named one of the "world's leading young investigations specialists" by *Global Investigations Review* "40 Under 40," as well as a "Rising Star" in the Government Contracts and White Collar fields by *Law360* and *The National Law Journal*, respectively. Most recently, John was recognized by Washington, D.C. *Super Lawyers* as a "Top Rated White Collar Attorney." He also has been recognized by *Benchmark Litigation* as a "Future Litigation Star" in Washington, D.C. (2025) and by *Who's Who Legal Investigations* guide as a "Future Leader" in Investigations (2022 - 2024).

A representative sampling of John's reported client engagements include:

- *In the Matter of Kraft Heinz Co.* – Negotiated a successful resolution of accounting fraud claims brought by the SEC with no criminal component, substantially reduced financial penalty, and non-scienter-based charges;
- *United States & SEC v. Hewlett-Packard Co. et al.* – Negotiated a successful resolution of FCPA claims brought by DOJ and the SEC, including no criminal disposition for the parent issuer, no compliance monitor, and a substantially reduced financial settlement, then guide successor companies through successful completion of post-resolution reporting period;
- *United States v. ZTE Corp.* – Successfully litigated criminal probation revocation proceeding, persuading Court not to revoke probation or impose penalties and bring five-year compliance monitorship to an end (3:17-cr-00120-K, Dkt. 191 (Mar. 22, 2022));
- *Raytheon Co. v. United States* – Won a \$59 million judgment after a three-week



Capabilities

White Collar Defense and Investigations
Anti-Corruption & FCPA
Antitrust and Competition
Congressional Investigations
Crisis Management
False Claims Act / Qui Tam Defense
Government Contracts
International Trade
Labor and Employment
Litigation
National Security
Securities Enforcement
Securities Litigation
Trials

Credentials

Education

Georgetown University - 2005 Juris Doctor
University of Maryland - 2001 Bachelor of Arts

Admissions

Maryland Bar
District of Columbia Bar

trial before the U.S. Court of Federal Claims in a dispute with the Government concerning pension costs and successfully defended the trial court's judgment on appeal to the Federal Circuit (105 Fed. Cl. 236 (2012) (aff'd 747 F.3d 1341 (Fed Cir. 2014)));

- *David R. Faulkner v. State of Maryland* – Successfully litigated writ of actual innocence leading to reversal of Mr. Faulkner's convictions, dismissal of all charges, and his release from prison after 20 years of wrongful imprisonment (468 Md. 418 (2020));
- *United States v. Alan J. Saltzman, D.O.* – Successfully litigated motion to sever and stay indicted healthcare fraud prosecution based on client's physical incapacity (2016 WL 287052 (D.D.C. Jan. 22, 2016)), leading to complete dismissal of charges against the client;
- *United States v. Michael D. Parry* – Investigated allegations of corporate embezzlement on behalf of the Board of Directors of a non-profit organization and government contractor, resulting in a multi-million civil settlement for the organization and criminal prosecution of the former executive;
- *In the Matter of Theodore W. Urban* – Successful trial defense of the former General Counsel of a broker-dealer charged with failing to supervise a broker, culminating in an acquittal on all charges (99 SEC Docket 994 (2010));
- *SEC v. General Electric Co.* – Obtained a declination of criminal prosecution by DOJ in an FCPA investigation arising out of the Oil-for-Food Program and negotiated a favorable settlement with the SEC;
- *The Allied Defense Group, Inc.* – Obtained declinations of criminal and civil enforcement action by DOJ and the SEC in a joint FCPA investigation arising from the arrest of a former employee in the 2010 "FCPA Sting" as well as the dismissal of a federal employment lawsuit brought by the former employee;
- *United States v. John Ferro* – Obtained dismissal of all charges stemming from an unconstitutional search and seizure; and
- *United Parcel Service, Inc. v. Bureau of Safety & Regulation* – Obtained the reversal of an administrative occupational safety and health citation in the Court of Appeals of Michigan and then successfully defended the Court of Appeals' decision before the Michigan Supreme Court (745 N.W. 2d 125 (Mich App. 2007) (aff'd 749 N.W. 2d 746 (Mich. 2008))).

A representative sampling of confidential client engagements include:

- Ongoing representation of a global telecommunications company in an FCPA investigation before DOJ;
- Successfully persuaded DOJ and the SEC to decline charges against two separate global technology companies in FCPA investigations, one arising out of Southeast Asia and the other Latin America;
- Representation of a global consumer packaged goods company in multiple China-based anti-corruption investigations as well as a Russia-based sanctions investigation;
- Representation of a global telecommunications company in an Egypt-based anti-corruption investigation;
- Representation of a global financial institution in a multi-agency investigation concerning the U.S. Treasuries market;
- Representation of global trading company in connection with alleged North Korean sanctions violations;
- Representation of multi-national wellness device manufacturer in connection with alleged FDA regulatory non-compliances;
- Successfully persuaded DOJ and the SEC to decline charges against a senior

John W.F. Chesley Partner

jchesley@gibsondunn.com

T: +1 202.887.3788

Washington, D.C.

lawyer in connection with a joint FCPA investigation concerning the alleged breach of a deferred prosecution agreement;

- Successfully persuaded the SEC to decline charges, post-Wells notice, against the CFO of a mining company in connection with allegations of FCPA violations;
- Representation of CIA employee in “Spying on the Senate” investigation, resulting in full exoneration of the client;
- Investigation of alleged corruption concerns in West Africa on behalf of a global energy company;
- Representation of a global telecommunications company in a multi-jurisdictional review of network performance reporting practices;
- Investigation of whistleblower concerns relating to energy reserve reporting practices on behalf of a global energy company;
- Representation of a defense contractor in a Procurement Integrity Act investigation being conducted by the Naval Criminal Investigative Service, as well as suspension and debarment proceedings before the Naval Office of Acquisition Integrity;
- Representation of a Big 4 accounting firm in a Senate Permanent Subcommittee on Investigations inquiry into international taxation matters;
- Representation of a major multi-national in connection with SOX whistleblower claims raised by an attorney formerly employed by an Indian subsidiary;
- Representation of a defense contractor in an internal review of compliance with export laws, including the International Traffic in Arms Regulations;
- Representation of a defense contractor before the Air Force Office of Special Investigations, Defense Contract Audit Agency, and SEC in connection with SOX whistleblower claims raised by the contractor’s chief compliance officer;
- Representation of a defense contractor in a grand jury investigation arising from allegations of improper political contributions;
- Representation of a real estate development firm in a grand jury investigation arising from alleged violations of the Clean Water Act;
- Representation of a senior chemical company executive in connection with criminal antitrust investigations in the United States and Canada and collateral, multi-district civil litigation in the United States; and
- Buy- and sell-side representation of numerous clients across a multitude of industries in connection with pre-acquisition FCPA due diligence reviews.

John publishes and speaks regularly on legal developments, particularly involving the FCPA. In addition, he is frequently quoted in print publications such as *Bloomberg BNA*, *Compliance Week*, *Corporate Counsel*, *Global Investigations Review*, *Law360*, *The FCPA Report*, and *SEC Today* and has appeared as a legal commentator on the Fox News Channel.

Examples of recent speaking engagements include:

- Co-Presenter, “FCPA 2022 Year-End Update” (March 2023);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions (2022 Update),” Securities Docket Webcast (February 2023);
- Co-Presenter, “FCPA 2021 Year-End Update” (February 2022);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions (2021 Update),” Securities Docket Webcast (January 2022);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions (2020 Update),” Securities Docket Webcast (February 2021);

John W.F. Chesley

Partner

jchesley@gibsondunn.com

T: +1 202.887.3788

Washington, D.C.

John W.F. Chesley Partner

jchesley@gibsondunn.com

T: +1 202.887.3788

Washington, D.C.

- Co-Presenter, “FCPA 2020 Year-End Update” (January 2021);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions (2019 Update),” Securities Docket Webcast (January 2020);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions (2018 Update),” Securities Docket Webcast (January 2019);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions and the FCPA (2017 Update),” Securities Docket Webcast (December 2017);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions and the FCPA (2016 Update),” Securities Docket Webcast (January 2017);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions and the FCPA (2015 Update),” Securities Docket Webcast (December 2015);
- Panelist, “Whistleblower Complaints and Fraud Investigations: Putting Theory into Practice,” Association of Corporate Counsel, National Capital Region (April 2015);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions and the FCPA (2014 Update),” Securities Docket Webcast (December 2014);
- Co-Presenter, “Global Anti-Corruption Enforcement & Compliance: 2013 Year In Review,” Securities Docket Webcast (February 2014);
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions and the FCPA (2013 Update),” Securities Docket Webcast (December 2013);
- Co-Presenter, “The Internal Audit Function and Anti-Corruption Compliance,” Securities Docket Webcast (June 2013);
- Panelist, “Global Securities Enforcement Issues: From Morrison to China,” District of Columbia Bar (May 2013);
- Co-Presenter, “FCPA Compliance Guide Update,” Washington Metropolitan Area Corporate Counsel Association Webcast (December 2012); and
- Co-Presenter, “Navigating the Minefield of Dodd-Frank’s Whistleblower Provisions and the FCPA,” Securities Docket Webcast (December 2012).”

In July 2016, a Gibson Dunn team led by John was presented with the “Defender of Innocence” award by The Mid-Atlantic Innocence Project in recognition of their efforts to vindicate and free from prison David R. Faulkner.

John graduated with honors from the Georgetown University Law Center in 2005, where he attended classes while working for the National Criminal Enforcement Section of the U.S. Department of Justice, Antitrust Division. He received his undergraduate degree with honors from the University of Maryland in 2001 and also is a former police officer.

John is a member of the bars of the State of Maryland and the District of Columbia and has held a Secret security clearance.