

David A. Wolber

Registered Foreign Lawyer (New York)

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Hong Kong

David A. Wolber is a Registered Foreign Lawyer (New York) in Hong Kong and of counsel in the Hong Kong office of Gibson, Dunn & Crutcher. He is a member of the firm's International Trade, Financial Regulatory, and White Collar Defense and Investigations Practice Groups.

David assists clients around the world in understanding and navigating complex legal, compliance, reputational, political and other risks arising out of the interplay of various international trade, national security and financial crime laws and regulations, with particular expertise advising clients on economic and trade sanctions, export controls, foreign direct investment controls/CFIUS, anti-money laundering ("AML") and anti-bribery and anti-corruption ("ABC") laws and regulations.

He routinely advocates on behalf of clients seeking CFIUS review, filing for trade-related licenses, responding to governmental inquiries or subpoenas, submitting self-disclosures related to potentially non-compliant activity, and dealing with formal regulatory investigations or enforcement actions.

David is recognized as a recommended lawyer for Regulatory by *The Legal 500 Asia Pacific*.

David resumed his practice at Gibson Dunn in 2022 after taking a five-year hiatus to serve as in-house counsel to two major global financial institutions. From 2019 to 2022, he served as global financial crime counsel for HSBC, located in Hong Kong, where he advised the bank globally on compliance and risk mitigation strategies associated with various jurisdictions' sanctions, export controls, AML, ABC and national security laws and regulations, with particular focus on such issues affecting the bank in Asia. During his tenure with HSBC, David played a key role in advising and helping to guide the bank through the significant challenges posed to global financial institutions by the rising tensions in U.S.-China relations and the related proliferation of law, regulation and political action in the U.S., Hong Kong and the People's Republic of China.

From 2017 to 2019, David acted in a similar capacity at MUFG Bank, serving as sole financial crime counsel to the bank and key partner to the global financial crime compliance function headquartered in New York.

Prior to becoming an attorney, he spent more than 10 years in business strategy and development roles at Big Four accounting firms and major U.S. law firms.

David earned his Juris Doctor (*magna cum laude*) from Georgetown University Law Center in 2011. He received a Master of Science in Foreign Service from Georgetown University in 1997, where he focused on International Trade and Asian Political Economy, and his Bachelor of Arts from Rockhurst College in 1994.



Capabilities

- International Trade
- Anti-Money Laundering
- Financial Institutions
- Financial Regulatory
- National Security
- Transportation and Space
- White Collar Defense and Investigations

Credentials

Education

- Georgetown University - 2011 Juris Doctor
- Georgetown University - 1997 Master of Science
- Rockhurst University - 1994 Bachelor of Arts

Admissions

- New York Bar
- District of Columbia Bar

David is a member of the New York State and District of Columbia Bars.

Representative Matters

- Provide ongoing, broad-based sanctions advisory and support for many large global and regional banks and other financial institutions, fin-tech and tech-fin companies in Asia, Europe and the U.S.
- Advise a variety of Fortune 500 and other large corporates on the impact of global sanctions and export controls on Russia, particularly in the financial services, energy sector, transportation and manufacturing sectors.
- Review, revise and draft sanctions and export controls policies and procedures for U.S. and local companies operating in Asia seeking to comply with and mitigate various risks arising out of the patchwork of evolving sanctions and export control laws and regulations around the world.
- Advise investment and private equity funds on the legal and other risks stemming from various sanctions laws and regulations increasingly targeting investment activities, and assist in developing strategies and approaches to account for and mitigate such risks, particularly when it comes to establishing or operating cross-border investment vehicles into or out of Asia.
- Advise numerous foreign investors, including investors in China and the broader Asia Pacific region, on CFIUS jurisdiction and filing requirements. Represent investment funds, technology companies and other corporates in filings and advocacy before the Committee.

Recent Speaking Engagements, Publications and Press

- Co-author, [The International Comparative Legal Guide - Sanctions 2025](#) chapter entitled "U.S.-China Strategic Competition and the Impact of Economic Statecraft on Global Financial Institutions and Corporates," September 20, 2024.
- Co-author, [LexisNexis](#) article entitled "A Committee of Consequence: CFIUS Debuts Record Penalties, Expands Jurisdiction," September 20, 2024.
- Co-author, [Global Investigations Review](#) article entitled "Sanctions considerations for non-governmental organisations," June 20, 2024.
- Panelist, "Identifying Ownership & Control Relationships: Evolving Challenges and Expectations," Sanctions SOS, June 19, 2024.
- Contributing author, [Corporate Disputes Magazine](#) article entitled "Commercial Disputes Arising From International Sanctions," Jul-Sep 2024 issue.
- Presenter, "Navigating Geopolitics and Increasing Risks in International Trade Compliance," Chambers Greater China Region High Quality Development Forum 2024 (Hong Kong), May 29, 2024.
- Panelist, "Case Study: ISO 15022 to 20022 Shift and Impact on Sanctions Screening," ACAMS The Assembly APAC 2024, April 23, 2024.
- Quoted in [Nikkei Asia](#) article entitled "Nvidia chip prices soar in Asia on U.S. curbs and AI boom," February 2, 2024.
- Quoted in [ALM](#) article entitled "Latest Biden Order Throws Another Wrench into Sino-U.S. Trade, Lawyers Say," August 10, 2023.
- Webinar Presenter, "Current Sanctions Against Russia by Major Countries," *Ficient Global*, July 26, 2023.
- Moderator, "Fireside Chat: Knock-on Effects: Assessing Emerging Geopolitical Risk and Sanctions Implications for Banks," Fraud and Financial Crime Asia 2023, Regulation Asia, July 13, 2023.
- [Webinar](#) Panelist, "Sanctions on China: where are we heading?" *EU Sanctions*,

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May 2, 2023.

- Roundtable panelist, "[Sanctions compliance and enforcement](#)," *Financier Worldwide Magazine*, March 2023.
- Panelist, "Between a Rock and a Hard Place: Navigating a Unique Sanctions Environment in Hong Kong," ACAMS Hong Kong Symposium, November 16, 2022.
- Presenter, "International Sanctions," CFA Society Hong Kong, September 7, 2022.
- Panelist, "Redefining Risk: Sanctions and the Global Battle Against Kleptocracy," Fraud and Financial Crime Asia 2022, Regulation Asia, July 13, 2022.
- Quoted in [Reuters](#) article entitled "U.S. stops Russian bond payments, raising risk of default article entitled," April 5, 2022.
- Panelist, "Russia, Sanctions, and China: A Conversation with David Dollar of the Brookings Institution," American Chamber of Commerce (Hong Kong), March 29, 2022.

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