Ella Alves Capone

Of Counsel

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Washington, D.C.



Ella Alves Capone is of counsel in the Washington, D.C. office of Gibson Dunn. She is a member of the White Collar Defense and Investigations, Financial Regulatory, FinTech and Digital Assets, and Anti-Money Laundering Practice Groups.

Ella's practice focuses on advising multinational corporations and financial institutions on Bank Secrecy Act/anti-money laundering (BSA/AML), anti-corruption, sanctions, payments, and consumer financial regulatory and enforcement matters, with a particular focus on regulatory matters impacting banks, casinos, fintechs, e-commerce marketplaces, and digital assets businesses. She has significant experience representing clients in enforcement matters involving the Department of Justice (DOJ), Securities Exchange Commission (SEC), Financial Crimes Enforcement Network (FinCEN), Office of the Comptroller of the Currency (OCC), Office of Foreign Assets Control (OFAC), the Federal Reserve, and state financial services regulators, including the New York State Department of Financial Services (DFS) and state gaming regulators. She has successfully defended global clients in multi-jurisdictional and multi-agency enforcement matters involving the Foreign Corrupt Practices Act (FCPA), money laundering, consumer financial, securities, fraud, and sanctions allegations.

Ella has been featured as a fintech “Rising Star” by *Law360* in its 2023 publication of “attorneys under 40 whose legal accomplishments belie their age.” She has also been recognized by *Super Lawyers* each year since 2022 as a White Collar Defense “Rising Star.” In addition, she was recognized for her White Collar Litigation and Investigations work in the 2023 *Lawdragon 500 X – The Next Generation* edition, an inaugural guide highlighting attorneys “who will define where the legal profession of our country goes” and whose “leadership will be called upon by businesses and individuals when they face their crossroads.”

Ella has significant experience advising regulated and unregulated clients on the design, implementation, and enhancement of corporate compliance programs and BSA/AML programs. Ella frequently provides training and speaks and writes on financial services regulations and corporate compliance programs, including enforcement trends, industry best practices, and regulator expectations.

Ella has significant experience working on international matters, with particular expertise in Latin America. She is fluent in Portuguese, and her representative matters include several anti-corruption and corporate compliance matters in Brazil, including the representation of Petróleo Brasileiro S.A. – Petrobras in connection with investigations by the SEC and DOJ.

Ella's representative matters include:

- Representing a client in the gaming industry before FinCEN in an AML enforcement matter.

Capabilities

White Collar Defense and Investigations
Anti-Corruption & FCPA
Anti-Money Laundering
Betting and Gaming
Consumer Protection
Financial Institutions
Financial Regulatory
Fintech and Digital Assets
International Trade Advisory and Enforcement
Litigation
Privacy, Cybersecurity, and Data Innovation
Sanctions and Export Enforcement
Tech and Innovation

Credentials

Education

New York University - 2011 Juris Doctor
Fordham University - 2008 Bachelor of Science

Admissions

District of Columbia Bar
New York Bar

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- Conducting an extensive anti-corruption, AML, and securities internal investigation for a major bank in a matter involving engagement with DOJ, the SEC, FINRA, and federal banking regulators.
- Representing a large bank in a sanctions and AML matter involving engagement with DOJ, OFAC, and banking regulators.
- Representing a casino in conducting an internal investigation and engaging with DOJ and local gaming regulators on BSA/AML matters.
- Advising leading social media and tech clients on payments, BSA/AML, sanctions, and consumer financial matters associated with creator monetization programs, marketplace offerings, reward programs, and platform tokens.
- Conducting anti-corruption and AML compliance program assessments for a social networking client.
- Representing a cryptocurrency exchange in connection with investigations by the SEC, FinCEN, and OFAC and in developing and implementing a BSA/AML and sanctions compliance program.
- Advising a leading technology company on BSA/AML, sanctions, and securities matters associated with launching NFT products.
- Advising a global financial services company on BSA/AML, state money transmitter, sanctions, and securities compliance and licensing matters associated with launching a cryptocurrency custody and liquidity solution.
- Conducting token securities assessments and developing corporate token assessment procedures for multiple TradFi and blockchain entities.
- Advising a cryptocurrency exchange and other Web 3.0 clients on regulatory considerations and risk mitigation strategies associated with launching tokens and decentralizing operations.
- Conducting pre-deal AML, anti-corruption, and sanctions due diligence and post-acquisition compliance integration in connection with corporate transactions for multiple global investment firms.

Representative speaking engagements and writings include the following:

- “Bank Secrecy Act, Anti-Money Laundering, and OFAC Compliance: Recent Regulatory and Enforcement Updates,” Presenter, BARBRI CLE Training (February 2026);
- “Anti-Money Laundering: USA Law Chapter,” Author, International Comparative Legal Guides (Editions 2018-2026);
- “Annual Update on BSA/AML, Sanctions, & Export Controls Enforcement and Compliance,” Presenter, Gibson Dunn Webcast (2020-2026).
- “AML requirements for covered institutions and individuals in USA,” Author, Lexology (Editions 2022 – 2026);
- “Compliance 360: Organization, Governance & Management,” Presenter, Institute of International Bankers (October 2025);
- “Anti-Money Laundering Compliance Programs for Financial Institutions and Other Businesses” in *The Complete Compliance and Ethics Manual*, Author, Society of Corporate Compliance and Ethics (Editions 2022 - 2026);
- “Regulators’ Outlook: Trends and Expectations for AML Professionals,” Presenter, Institute of International Bankers (September 2023);
- “FCPA Year-End Update,” Presenter, Gibson Dunn Webcast (Annually 2021 – 2024);
- “Chapter 4: Criminal History” in *Practice Under the Federal Sentencing Guidelines*, Author, ABA Treatise (Editions 2018-2024);

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- “Sanctions and Anti-Money Laundering Training in the Digital Assets Sector,” Presenter (July 2022);
- “The Role of Internal Audit and Associated Best Practices,” Presenter, Corporate Training Program (November 2021);
- “Key Anti-Corruption Priorities for the Biden Administration: The Corruption-Money Laundering Connection,” Presenter, American University Washington College of Law Webcast (April 2021);
- “Compliance and Economic Analysis,” Presenter, Symposium on Economic Analysis of Law (February 2020);
- “Compliance and Beyond: Trends in Cross-Border Enforcement Investigations and Law Enforcement,” Presenter, Brazil Compliance Symposium (April 2019);
- “The U.S. Foreign Corrupt Practices Act: Enforcement and Compliance” in *Securities Practice Series Portfolio No. 285*, Author, Bloomberg BNA (2018).

Ella graduated from New York University School of Law in 2011, where she was a member of the Honorary Moot Court Board. She graduated *summa cum laude* and with departmental honors for all years from Fordham University, where she earned a dual degree in Psychology and Sociology and was inducted into Phi Beta Kappa. Prior to joining Gibson Dunn, she practiced at a major international law firm in Washington, D.C. and New York, where she specialized in white collar criminal defense, securities litigation, and internal investigations.

Ella is admitted to practice law in the District of Columbia and New York, as well as before the United States District Courts for the Eastern and Southern Districts of New York.

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