

# 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 & Crutcher. She is a member of the White Collar Defense and Investigations, Financial Regulatory, FinTech and Digital Assets, and Anti-Money Laundering Practice Groups.

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* as a 2022 and 2023 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'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, social media and gaming platforms, marketplaces, fintech, payment service providers, and digital assets businesses. She regularly advises clients on the implementation, enhancement, and assessment of their compliance programs and internal controls and on platform terms and conditions, including Terms of Service, Merchant Agreements, Sales Agreements, Payment and Refund Policies, and Payment Service Provider Agreements. Ella frequently provides clients with training on financial services regulations and corporate compliance programs, including enforcement trends, industry best practices, and regulator expectations.

Ella has significant experience representing clients in white collar and regulatory 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). She has successfully defended global clients in multi-jurisdictional and multi-agency enforcement matters involving Foreign Corrupt Practices Act (FCPA), AML, consumer financial, securities, fraud, and sanctions allegations.

A significant portion of Ella's practice entails advising cryptocurrency, non-fungible tokens (NFTs), and other blockchain businesses on regulatory compliance and enforcement matters. She regularly advises these types of entities on structuring products and payment models for regulatory compliance. She also has extensive experience advising clients on regulatory coverage and licensing under state money transmitter regulations, including BitLicense requirements.

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

### 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

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. She is also a member of the Board of the Brazil-US 40 and Under White Collar Lawyers Initiative.

**Ella's representative matters include:**

- 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 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.
- 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.
- Representing a large bank in a sanctions and AML matter involving engagement with DOJ, OFAC, and banking regulators.
- Conducting token securities assessments and developing corporate token assessment procedures for multiple TradFi and blockchain entities.
- Representing a casino in conducting an internal investigation and engaging with DOJ and local gaming regulators on BSA/AML matters.
- Conducting anti-corruption and AML compliance program assessments for a social networking client.
- 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.
- Representing a client in the gaming industry before FinCEN in an AML enforcement matter.

Ella regularly speaks and writes on anti-corruption, BSA/AML, and compliance issues.

**Representative speaking engagements and writings include the following:**

- “FCPA Year-End Update,” Presenter, Gibson Dunn Webcast (March 2023);
- “Bank Secrecy Act/Anti-Money Laundering and Sanctions Enforcement and Compliance Update,” Presenter, Gibson Dunn Webcast (February 2023);
- “Anti-Money Laundering Enforcement and Compliance Training,” Presenter (August 2022);
- “Sanctions and Anti-Money Laundering Training in the Digital Assets Sector,” Presenter (July 2022);
- “AML requirements for covered institutions and individuals in USA,” Author, Lexology (May 2022);
- “Anti-Money Laundering Compliance Programs for Financial Institutions and Other Businesses” in *The Complete Compliance and Ethics Manual*, Author, Society of

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Corporate Compliance and Ethics (2022);

- “FCPA Year-End Update,” Presenter, Gibson Dunn Webcast (February 2022);
- “BSA/AML and Sanctions Compliance and Enforcement Update,” Presenter, Gibson Dunn Webcast (January 2022);
- “The Role of Internal Audit and Associated Best Practices,” Presenter, Corporate Training Program (November 2021);
- “Managing Internal Audit and Investigations,” Presenter, Gibson Dunn Webcast (November 2021);
- “Cryptocurrency Regulatory Overview Training,” Presenter (September 2021);
- “The Anti-Money Laundering Act of 2020’s Corporate Transparency Act,” Author, International Comparative Legal Guides (May 2021);
- “Anti-Money Laundering 2018: USA Law Chapter,” Author, International Comparative Legal Guides (2018-2021);
- “Key Anti-Corruption Priorities for the Biden Administration: The Corruption-Money Laundering Connection,” Presenter, American University Washington College of Law Webcast (April 2021);
- “Chapter 4: Criminal History” in *Practice Under the Federal Sentencing Guidelines*, Author, ABA Treatise (2018-2020);
- “FCPA Year-End Update,” Presenter, Gibson Dunn Webcast (January 2021);
- “The Top 10 Takeaways for Financial Institutions from the Anti-Money Laundering Act of 2020,” Author, Gibson Dunn Client Alert (January 2021);
- “International Anti-Money Laundering and Sanctions Enforcement,” Presenter, Gibson Dunn Webcast (December 2020);
- “Striving and Thriving During the Pandemic,” Panelist, Women In Law Empowerment Forum (WILEF) Virtual Panel (December 2020);
- “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);
- “Compliance Programs of Private Enterprise,” Presenter, Symposium on Compliance (Pro-Competition & Anti-Corruption Laws) in Brazil and The United States (February 2018); and
- “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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