John W.F. Chesley

Partner

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John Chesley is a Chambers-ranked 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. Most recently, John was recommended by *The Legal 500* 2025 for his work in Government Contracts. He was also recognized in the 2026 edition of *Chambers USA* as a leading FCPA practitioner, in which clients described him as "smart, practical and [] a pleasure to work with," as well as "incredibly responsive and practical in his advice." Other rankings include "Global Leader in Crisis Management" (*Lawdragon*), "Top Rated White Collar Attorney" (*Washington, D.C. Super Lawyers*), "World's Leading Young Investigations Specialist" (*Global Investigations Review*), "Rising Star" (*Law360*, Government Contracts) (*The National Law Journal*, White Collar), Washington, D.C. "Future Litigation Star" (*Benchmark Litigation*), and "Future Leader" in Investigations (*Who's Who Legal Investigations*).

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

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 Advisory and Enforcement
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

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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 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. Angel Neri Estrada-Tello* – Successfully litigated motion for sentencing reduction, resulting in the client's immediate release and return to his family (8:02-cr-00228 (M.D. Fla. Feb. 14, 2025));
- *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;

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- 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 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, "Key Strategies to Navigating Cross-Border & Multilingual Compliance Investigations" (April 2025);
- Co-Presenter, "FCPA Update: 2024 & Q1 2025 Developments" (April 2025);
- Co-Presenter, "The Economic Crime and Corporate Transparency Act"

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(December 2024);

- Co-Presenter, “FCPA 2023 Year-End Update” (February 2024);
- 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); and
- Co-Presenter, “FCPA 2020 Year-End Update” (January 2021).

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.

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