Pedro G. Soto

Of Counsel

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Pedro G. Soto is of counsel in the Washington, D.C. office of Gibson Dunn. He is a member of the White Collar Defense and Investigations group, and his practice focuses primarily on anti-corruption and fraud matters. He has approximately 15 years of experience representing corporations and individuals under investigation by government authorities around the world, as well as the integrity units of multilateral development banks (MDBs), such as the World Bank and the Asian Development Bank. He has also conducted compliance due diligence for over 100 transactions around the world. Pedro has particularly deep experience in Latin America, where he has worked on matters in more than 15 different countries. He also represents foreign governments and private claimants in significant litigation and arbitration matters.

Pedro has been recognized in leading legal publications as a "Latin America expert with experience of investigations throughout the region[,]" (*The Legal 500 Latin America 2026* – "Compliance and Investigations") and as one of the "Best Lawyers: Ones to Watch" in "Criminal Defense: White Collar" by *The Best Lawyers in America (2022 through 2025)*.

Pedro's representative matters include:

White Collar Defense/Investigation Matters:

- Represented a global energy company in a corruption probe relating to Mexico.
 DOJ and the SEC closed the investigation without action against client.
- Obtained a declination for a large European bank in an investigation by a foreign competition enforcement agency.
- Represented a global bank in a securities fraud investigation. All four enforcement agencies closed the investigation without action against client.
- Represented a U.S.-based, global technology company in an investigation into potential bribery in Argentina. DOJ and the SEC closed the investigation without action against client.
- Represented a European construction company in connection with a DOJ inquiry into potential public bribery in Latin America. DOJ closed the matter without action against client.
- Represented a senior official of a Fortune 100 firm under investigation by the DOJ for bribery of government officials in Latin America. DOJ closed the investigation without action against client.
- Represented a senior manager of a Fortune 50 firm who was under investigation by DOJ for bribery of government officials in Europe. DOJ closed the investigation without action against client.
- Represented a Fortune 500 company in connection with a whistleblower report sent to DOJ and the SEC alleging public bribery in Central America. Both agencies



Capabilities

White Collar Defense and Investigations Accounting Firm Advisory and Defense Anti-Corruption & FCPA Consumer Protection Latin America

Credentials

Education

University of Chicago - 2011 Juris Doctor Georgetown University - 2008 B.A. Bachelor of Arts

Admissions

District of Columbia Bar

closed the matter without action against client.

- Defended a large public infrastructure firm in Asian Development Bank Integrity proceedings. The regulator closed the matter without charges against the client.
- Represented a European construction/engineering firm in World Bank Integrity proceedings, obtaining a more than 80% reduction off the sanctions guidelines applicable to the matter.

Litigation and Arbitration Matters:

- Successfully defended the Government of Panama in an international arbitration brought by foreign investors seeking more than US\$400 million in damages.
 Obtained full dismissal of all claims at the jurisdictional phase and an award of costs in favor of client.
- Successfully defended the Government of Costa Rica from an international arbitration claim seeking US\$345 million in damages. Following a week-long trial, obtained dismissal of all claims against client.
- Successfully represented a large, Europe-based energy company in the annulment phase of an international arbitration proceeding against the Republic of Argentina.
 Obtained the dismissal of all claims for annulment, thus upholding the arbitral award of over US\$200 million in favor of client.

Compliance and Due Diligence Matters:

- Conducted anti-corruption due diligence on behalf of a Fortune 50 in connection with a US\$5+ billion investment in India.
- Conducted anti-corruption due diligence on behalf of a Fortune 10 in connection with a proposed US\$250+ million investment in India.
- Conducted anti-corruption, anti-money laundering, and trade sanctions/export controls due diligence on behalf of a global investment bank in connection with a US\$130+ million infrastructure investment in South America.
- Conducted pre-acquisition due diligence and post-acquisition compliance integration on behalf of a global resources company in connection with the firstever joint operating agreement with Mexico's state-owned oil and gas company, PEMEX.
- Conducted anti-corruption due diligence on behalf of a major U.S. investment fund in connection with a proposed US\$200+ million investment in a renewable energy company in South America.

Pedro speaks and writes frequently on white collar enforcement and compliance issues. Some of his most recent speaking engagements include:

- "Anti-Corruption Enforcement and Recent Developments in Latin America" (Speaker, Webcast, December 10, 2024)
- "Recent Developments in Multilateral Development Bank Enforcement" (Speaker, Webcast, February 28, 2024)
- "Anti-Corruption Compliance in Financial Transactions and M&A" (Speaker, Lima, Peru, November 14, 2023)
- "Offshore Companies and Transnational Money Laundering" (Speaker, Lima, Peru, November 13, 2023)
- "Round Table of International Practitioners: Update on LatAm Anti-Corruption Investigations" (Speaker, 4th International Anti-corruption Conference of ICC Mexico City, October 2023)
- "Corruption in Investment Projects: The Standard of Proof and the Consequences for Investment Arbitration" (Speaker, 2023 World Arbitration Update, Washington,

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D.C., May 22, 2023)

- "Anti-Corruption Programs and Investigations in Companies: Challenges, Opportunities, and Risks" (Speaker, American Chamber of Commerce of Mexico, December 2022)
- "Anti-Corruption Due Diligence in M&A Transactions" (Lecturer, International Chamber of Commerce's Anti-Corruption Certificate Program – Mexico City, annually from 2018-2024)

In addition, Pedro is the co-author of, among others: "Cooperating with Authorities: The U.S. Perspective" (published in Global Investigation Review's The Practitioner's Guide to Global Investigations), "Common Pitfalls in MDB Audits and Charting a Path to Effective Settlement of Allegations" (published in Global Investigation Review's The Guide to Multilateral Development Bank Investigations, "Channeling the Channel Partner Risk: Addressing Anti-Corruption Risk with Channel Partners in the Technology Sector," (published in The FCPA Report) and "Anti-Corruption Compliance in Emerging Markets: A Resource Guide" (an e-book for compliance professionals).

A native Spanish speaker, Pedro has extensive experience in Latin America. He has worked on matters involving Argentina, Bolivia, Chile, Colombia, Costa Rica, the Dominican Republic, Ecuador, El Salvador, Guatemala, Mexico, Panama, Paraguay, Peru, Puerto Rico, Uruguay, and Venezuela. Pedro also has experience in matters throughout Asia, Europe, and the Middle East.

He earned a Juris Doctor, with honors, from the University of Chicago Law School and a Bachelor of Arts, *magna cum laude*, from Georgetown University.

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