David A. Wolber

Registered Foreign Lawyer (New York) of Gibson, Dunn & Crutcher (Hong Kong) and Partner of Gibson, Dunn & Crutcher LLP

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David A. Wolber is a Registered Foreign Lawyer (New York) and a partner of Gibson, Dunn & Crutcher LLP. 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, U.S. outbound investment regulations, 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 trade-related license applications, and U.S. outbound investment notifications, 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 ranked as a leading International Trade attorney by *Chambers Asia Pacific, Chambers Greater China Region,* and *Chambers Global*: China. He is also ranked as a recommended lawyer for Regulatory by *The Legal 500 Asia Pacific*, in which interviewed clients remarked that David "is one of the rare lawyers in the region who has deep experience working in house on sanctions matters. He brings this experience to his practice to deliver workable advice that is a cut above," and is "always reachable, contactable and offers very quick turnaround, sometimes within the day." In the *Chambers Greater China Region* guide, a client noted that David "delivers practical, workable advice that is a cut above the textbook responses that other lawyers in the field may offer."

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.

Capabilities

International Trade Advisory and Enforcement
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

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GIBSON DUNN

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.

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

- Panelist, “Trends and Techniques in Sanctions Evasion and Proliferation Financing,” ABS Sanctions Workshop 2026, September 28, 2026.
- Quoted in ALB article entitled “Asia Pacific M&A surges as dealmakers navigate regulatory scrutiny,” November 2025.
- Presenter, "International Trade Regulation, Competition and Enforcement in the Era of Trump 2.0," Chambers High-Quality Development Forum 2025 (Hong Kong), May 21, 2025.
- Presenter, "Regulatory Expectations for Sanctions," ABS-SFA Sanctions Workshop, March 28, 2025.
- Quoted in Lloyd's List article entitled “What Pentagon's new Chinese military designations mean for Cosco,” January 15, 2025.
- Panelist, "Lloyd's List Intelligence Seminar," Hong Kong Maritime Week, November 20, 2024.
- 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.

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- 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*, 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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