GIBSON DUNN

Michelle Kirschner Interviewed by The Banker About “Uncomfortable Fiction” of AI Agent Compliance

In the Media | April 17, 2026

In an interview with *The Banker* (“The ‘Uncomfortable Fiction’ of AI Agent Compliance,” April 15, 2026), partner Michelle Kirschner discusses the “uncomfortable fiction” of liability for AI decisions in the U.K., which holds (human) senior managers responsible. “We are holding a person accountable for a decision they did not make, may not have foreseen and potentially could not have prevented,” she says.

The Banker’s in-depth feature looks at how banks using AI agents for operational tasks face risks due to the lack of a compliance framework governing what happens when AI causes a financial loss, as well as how that risk sharpens when it comes to cross-border activity.

Related People

Michelle M. Kirschner

Related Capabilities

Financial Regulatory

© 2026 Gibson, Dunn & Crutcher LLP. All rights reserved. For contact and other information, please visit us at www.gibsondunn.com. | **www.gibsondunn.com**