

## Richard J. Gibbon

### Partner

#### Abu Dhabi

T +971 55 1621633

#### Baku

T +994 51 2135790

#### Geneva

T +971 55 1621633

[richard.gibbon@squirepb.com](mailto:richard.gibbon@squirepb.com)

#### Astana

T +994 51 2135790

#### Dubai

T +971 55 1621633



### About Richard

Rich Gibbon is a partner in our Government Investigations & White Collar Practice focused on internal investigations and global financial crimes compliance and defense.

He has been based in the Middle East for almost 20 years and has extensive experience managing crises and counseling boards of directors and senior management across the Middle East, the Commonwealth of Independent States (CIS), Africa, Europe, the Levant, and Central and South Asia, through multiagency, multijurisdictional financial crime investigations and enforcement actions. This includes multinational corporates in connection with anti-bribery and corruption regimes and a particular concentration on matters related to financial institutions involving economic sanctions, money laundering and bank fraud. Due to the sensitive and confidential nature of Rich's work, much of it is not public. Even so, he has been recognized as a "Leading Lawyer" across Europe, the Middle East and Africa for Compliance and Investigations, recommended as a "Global Leader" for Business Crime Defence and Investigations, and endorsed several times as a "White Collar Crime Adviser of the Year". *Legal 500* labels Rich "the best investigations, compliance, crisis management, and reputation management partner there is". The directory notes that he is "extremely diligent," "masterful at distilling critical details from volumes of complex and technical material," and "outright relentless in his pursuit of the best possible results or resolutions for his clients." *Chambers Global* states that Rich "understands complex financial transactions as well as any forensic accountant" and "works tenaciously to unearth and piece together the facts." Rich has twice led the firm to the recognition of "Middle East Regulatory and Investigations Team of the Year" at the Middle East Legal Awards.

Rich has a wealth of experience advising on the scope of economic sanctions administered by the US Treasury Department's Office of Foreign Assets Control (OFAC) and other international, regional and state bodies, and guiding clients when responding to related criminal and civil government inquiries. Rich also advises on collateral issues arising from political exposure, sanctions and money laundering matters, including facilitating relationships with US correspondent banks and other financial institutions, and he represents clients in sanctions delisting engagements. In addition, Rich has counseled clients across the defense and security, industrial services, medical devices and therapies, natural resources, pharmaceutical, oil and gas, retail, sporting, and technology sectors, in major US Foreign Corrupt Practices Act (FCPA) and UK Bribery Act (UKBA) representations in countless countries across the globe. He has conducted internal investigations into alleged misconduct and international investigations into alleged noncompliance by foreign agents and business partners, and he has addressed the implications of relevant laws in the context of M&A due diligence.

Rich is well-versed in helping clients mitigate risks and exposure to government investigations; prosecutions and penalties; derivative litigation; and reputational loss and brand devaluation, through robust compliance. He conducts high-level compliance assessments, or gap analyses, based on industry standards and international best practices, to identify deficiencies or conduct issues that could give rise to enforcement liability. He then collaborates with senior-level executives to develop comprehensive and customized solutions to resolve gaps, modify processes, augment compliance functions and internal controls, reform business conduct standards and assuage risks to business operations. He also provides internal training sessions to help operationalize compliance.

Of note, Rich served for six months as Interim Head of Group Ethics & Compliance for Etisalat by e&, an Emirati-based multinational technology and telecommunications group currently operating in 16 countries across the Middle East, Asia and Africa. Rich has lectured and acted as thesis advisor at the Paris-Sorbonne University in Abu Dhabi on the International Business Law Masters Degree, and regularly writes and speaks on global financial crimes compliance. He is a graduate of Cambridge University, INSEAD and the International Compliance Association (ICA), as well as a Certified Fraud Examiner (CFE) and the firm's Money Laundering Reporting Officer (MLRO).

## Experience

### Government Investigations & White Collar

- Advising Etisalat by e&, an Emirati-based multinational telecommunications services provider currently operating in 16 countries across the Middle East, Asia and Africa, during a six-month part-time assignment as Interim Head of Group Ethics & Compliance.
- Advising prominent persons in a confidential sovereign state with regard to challenging, managing and mitigating the reputational and transactional consequences of certain reporting by the International Consortium of Investigative Journalists (ICIJ) and the Organized Crime and Corruption Reporting Project (OCCRP) following the Panama, Pandora, and Paradise Papers, which were all public leaks of electronic documents memorializing offshore holdings and investments by the global wealthy elite.
- Advising the UAE Banks Federation (UBF) on various sanctions-related matters, including the preparation of customer communiqués setting forth compliance expectations and a detailed best practices advisory paper for bank compliance departments, as well as delivering interactive in-person training sessions and workshops to all UBF members on practical compliance with the multiple Russia/Ukraine-related sanctions regimes.

- Advising numerous financial institutions and other corporate entities with the assessment of anti-bribery and corruption, anti-money laundering and countering the financing of terrorism, conflicts of interest, corporate governance, economic sanctions, export controls, and US Foreign Account Tax Compliance Act (FATCA) compliance program components, by benchmarking against

appropriate standards that include local requirements and international best practices, and with remediation. In some cases, these representations led to non-US banks obtaining their first ever correspondent relationships with "Tier 1" US banks.

- Advising several foreign financial institutions, primarily in the Middle East, Asia and Africa, with investigations of potential violations of US sanctions and money laundering laws, including representation before OFAC, the US Department of Justice (DOJ), US Attorneys' Offices and other US and home-country enforcement agencies and regulators, including more than half of the nine Europe, Middle East and Africa (EMEA) Region banks identified by the US enforcement authorities as BNP Paribas "satellite banks." In some cases, these representations led to no-action letters from OFAC and declinations from the DOJ following yearslong investigations and enforcement actions that saw our clients faced with initial exposures of hundreds of millions, if not billions, of dollars.
- Advising a Middle Eastern bank with an investigation of all transactions since the Russian invasion of Ukraine, the design and implementation of robust remedial measures, and related reporting to the Central Bank of the UAE (CBUAE) and the prompt submission to OFAC of thorough and accurate responses to a significant number of requests for information (RFIs).
- Advising National Commercial Bank (later Saudi National Bank), Saudi Arabia's largest bank, in defending and settling a multiyear OFAC investigation of alleged violations of certain US sanctions.
- Advising Habib Bank Limited, Pakistan's largest bank, in liquidating its New York branch without further enforcement action by the Federal Reserve or the New York Department of Financial Services (NYDFS), including the prompt preparation and submission to NYDFS of several hundreds of RFI responses.
- Advising a Middle Eastern bank in defending and resolving a multiyear OFAC investigation with the issuance of a nonpublic cautionary letter and no finding of violation or monetary penalty.
- Advising a Middle Eastern bank on Bank Secrecy Act (BSA)/AML and sanctions matters related to loans, trade finance and customer due diligence.
- Advising an OFAC Specially Designated National and Blocked Person (SDN) Levantine financial institution in an internal investigation and with a request for reconsideration, seeking the rescission of its sanctions designation.
- Advising an OFAC SDN Middle Eastern logistics company in an internal investigation and with a request for reconsideration, seeking the rescission of its sanctions designation.
- Advising an OFAC SDN Asian petrochemicals company in an internal investigation and with a request for reconsideration, seeking the rescission of its sanctions designation.
- Advising the UAE branch of a large Asian bank in defending the findings of a special examination and resultant enforcement action brought by CBUAE, related to alleged anti-money laundering/countering the financing of terror (AML/CFT) and sanctions issues.
- Advising a Caucasus financial institution on adapting its existing AML/CFT and sanctions compliance program to allow it to bank customers established in a newly formed special economic zone.
- Advising a South Asian financial institution in an internal investigation of whistleblower allegations involving misconduct and self-dealing by key executives.
- Advising a UAE defense company with regard to challenging, managing and mitigating the consequences of the European Union Naval Force Mediterranean (IRINI) seizing on the high seas a delivery of armored vehicles that it alleged contravened a United Nations (UN) arms embargo, including by engaging directly with the UN.

- Advising a UAE defense company in an investigation of the unauthorized possible retransfer or release of International Traffic in Arms Regulations (ITAR)-controlled technical data received pursuant to several Technical Assistance Agreements (TAAs), with the implementation of corrective actions to remediate an identified process deficiency, and with a voluntary self-disclosure to the US Department of State's Directorate of Defense Trade Controls (DDTC).
- Advising a UAE defense company in the assessment of its compliance with US and UAE export controls, to ensure the retention of its business-critical ability to purchase and import US-origin software and technology.
- Advising the Audit Committee of a global food production and distribution company in an internal investigation of numerous whistleblower complaints alleging sanctions violations, letters of credit fraud, tax evasion, defrauding of shareholders, and deceptive business practices by senior executives.
- Advising a global food and beverage company in an internal investigation into historic payment practices and processes, and representation before a local Public Prosecutor.
- Advising Siemens AG's Audit Committee in connection with a worldwide white collar crime investigation into possible corrupt payments to government officials, which led to an early settlement of approximately US\$1.6 billion.
- Advising a member of the ruling family of the Emirate of Dubai following an internal investigation related to motorsports and Brazil.
- Advising the world's largest medical devices and therapies company with respect to six separate and distinct Foreign Corrupt Practices Act (FCPA) and UK Bribery Act (UKBA) inquiries in India, including conducting internal and key distributor investigations into alleged improper payments to government health care professionals, advising on the development of the company's internal business conduct standards and third party compliance procedures, and reporting to the DOJ and US Securities and Exchange Commission (SEC), resulting in a formal declination.
- Advising the world's largest retail corporation with respect to several separate and distinct FCPA and UKBA inquiries in India, including conducting internal investigations into alleged improper payments and alleged issuance of improper benefits to government officials, and reporting to the DOJ and SEC.
- Advising a major international pharmaceutical company with respect to an FCPA and UKBA inquiry in Iraq, including conducting internal and key distributor investigations into alleged improper payments to government health care professionals.
- Advising a major international metals company with respect to the voluntary self-disclosure to the DOJ and SEC of alleged improper payments made to government officials in Bahrain.
- Advising a major multinational technology and consulting corporation with respect to three separate and distinct FCPA and UKBA inquiries in Algeria and Tunisia, including conducting internal investigations into alleged improper payments to government officials.
- Advising a global oilfield product-manufacturing company with respect to FCPA-related due diligence on a host of its foreign agents and business partners operating across the Middle East and North Africa (MENA) and Levant Regions.
- Advising one of the world's largest oilfield services companies with respect to the business competence and integrity of the foreign agents and business partners of prospective acquisition targets across the MENA and Levant Regions.
- Advising a worldwide industrial services and engineered solutions company with respect to FCPA and UKBA issues in the Kingdom of Saudi Arabia, including advising on the development of the company's existing internal compliance controls and the creation and implementation of supplemental anticorruption compliance program components.

- Advising a Middle Eastern conglomerate in an internal investigation of whistleblower allegations involving bribery and corruption and procurement fraud by board members and key executives in a subsidiary company in Afghanistan.
- Advising a Middle Eastern conglomerate in an internal investigation of whistleblower allegations involving corruption, procurement fraud and breaches of immigration legislation by board members and key executives.
- Advising a major private security company in an internal investigation into various allegations of insurance fraud and other impropriety during its performance of a subcontract below the US government in Afghanistan.
- Advising a major Middle Eastern media conglomerate with respect to the proposed dissemination of information (including content from US network partners) into several MENA countries in the context of US sanctions regulations, and also provided OFAC, FCPA, anti-boycott, and anti-money laundering compliance training to the company's in-house legal team.
- Advising a major Middle Eastern real estate development company with respect to the proposed marketing and/or sale of real estate in Dubai to Iranian nationals in Iran in the context of US and EU sanctions regulations.
- Advising a Middle Eastern government-owned ports operations company with respect to its proposed expansion into several countries in Africa in the context of US sanctions regulations and other laws.
- Advising a Middle Eastern large-scale entertainment, leisure, retail and shopping malls company in the production of "business friendly" guides to US and EU sanctions regulations against Iran and Syria.
- Advising a global technology and investment conglomerate on the identification and analysis of the environmental, social and governance (ESG)-related laws, regulations and standards applicable to its operations and appointed directors in six Middle Eastern jurisdictions.

### **International Dispute Resolution and Litigation**

- Advising confidential investors in a multijurisdictional effort to recover hundreds of millions of dollars and euros expropriated, based in part on unmeritorious source of wealth arguments, by the special administrators of a private bank that fell insolvent following a USA PATRIOT Act §311 designation.
- Advising several Cayman Islands collective investment funds in a dispute between the nominee shareholders and beneficial owners of shares in the funds worth several hundreds of millions of dollars, and related actions in multiple common and civil law legal systems.
- Advising a British Virgin Islands (BVI)-based institutional investor in an investigation and claim for damages arising from unlawful means conspiracy when the European real estate holding company into which it had invested more than €100 million entered liquidation shortly after the publication of allegations of fraud, deception and financial misrepresentation. This case involved asset disclosure and freezing (Mareva) orders.
- Advising a Middle Eastern construction, logistics, secure accommodation and life support services contractor following a direction by the US Departments of State and Defense to certain prime contractors to cease contracting with the company (a de facto debarment), including representation in an action for declaratory and injunctive relief in the US District Court for the District of Columbia against the US Department of State and the Secretary of State, resulting in a favorable settlement permitting the company to continue contracting with prime contractors on US government (including State and Defense) contracts.

- Advising Standard Bank with respect to litigation in the UAE (Dubai and Sharjah) Courts and parallel LCIA proceedings subject to English law against various other regional banks and metals companies concerning the disputed ownership of millions of dollars of precious metals in the UAE.
- Advising the family and principal heirs of Arkady “Badri” Patarkatsishvili, a former Georgian presidential candidate, pursuant to alleged fraudulent claims in six jurisdictions concerning the beneficial ownership of assets worth US\$6 billion to US\$12 billion.
- Advising the Khalilifamilienstiftung (Khalili Family Trust), a prestigious Liechtenstein-based trust that is heavily involved in the art world, in relation to a multijurisdictional dispute, including litigation in the Dubai Court and the English High Court.
- Advising a major international construction company in a US\$110 million ICC arbitration subject to Qatari law brought by a subcontractor in relation to the export of liquefied natural gas (LNG) from Qatar. The dispute focused on the world’s first “Super Trains” (or LNG liquefaction and purification facilities), each producing 7.8 million tons of LNG per year, and involved the subcontractor’s claims for disruption, delay, prolongation, and acceleration, counterclaims for backcharges, and the final account between the parties.
- Advising Al Fattan Engineering LLC and Al Fattan Properties LLC in their successful jurisdictional challenge to a DIFC Court of First Instance (CFI) claim brought by a mechanical and electrical works subcontractor arising out of the Al Fattan Tower Currency House development in the DIFC. This case overruled a previous DIFC CFI judgment that practically denied any party that falls within the DIFC Courts’ jurisdiction the freedom to agree to arbitrate in the forum and under the rules of its choice. This is a seminal and widely acclaimed decision with respect to the extent and proper application of the DIFC Courts’ jurisdiction.
- Advising a major Middle Eastern project management company in the effective transfer and enforcement of a DIFC-LCIA Arbitration Award in Kuwait. This involved only the second applications in the history of the DIFC Court for the ratification of a DIFC-LCIA Award and the subsequent execution of the DIFC Court-ratified Award in the Dubai Court.
- Advising a major multinational investment group in an LCIA arbitration subject to English law arising out of a dispute with a high-net-worth Russian individual as to their competing interests in a Russian energy company worth approximately US\$775 million. This matter also involved a series of applications for interim relief to the English High Court, the British Virgin Islands High Court and the Isle of Man High Court.
- Advising a UAE Islamic insurance company in its recovery of misappropriated funds totaling millions of dollars, including securing a DIFC Court freezing order and a UAE Court precautionary attachment, following an internal investigation identifying undisclosed and material self-dealing by a former board member.
- Advising an Asian asset management company in obtaining a UAE Court performance order and in related enforcement proceedings seeking the recovery of a multimillion-dollar loan from a UAE entity accused of fraud.
- Advising a Swedish biofuel producer and supplier in a LMAA arbitration subject to Swedish law arising out of a dispute with a potential Swiss purchaser as to bioethanol futures contracts.
- Advising one of the world’s largest producers of alumina in an ICC arbitration subject to English law arising out of alleged breaches of an alumina sale and purchase contract.
- Advising one of the world’s largest traders of steel billets in a LCIA arbitration subject to English law arising out of short delivery and other alleged breaches of contract.
- Advising a Malaysian tsar and his luxury vehicle importation business in English High Court litigation against a former business partner arising out of alleged breaches of contract.



## Credentials

### Education

- International Compliance Association (ICA), Specialist in Money Laundering Risk in Correspondent Banking, 2025
- INSEAD, Leadership Development, 2021
- Certified Fraud Examiner (CFE) 2020
- University of Cambridge, Clare College, M.A., Law, 2010
- BPP Law School, L.P.C., 2007
- University of Cambridge, Clare College, B.A., Law, 2006

### Admissions

- Association of Certified Fraud Examiners (ACFE), 2020
- England and Wales, 2009

## Recognitions

- Leader of the Regulatory and Investigations Team of the Year, Middle East Legal Awards 2025
- Recommended as a "Thought Leader" for Business Crime Defence and Investigations by *Who's Who Legal* 2025
- Recognized as a "Leading Partner" across Europe, the Middle East and Africa for Compliance and Investigations by *Legal 500 Europe, Middle East & Africa* 2025
- Recognized for Corporate Compliance & Investigations – UAE by *Chambers Global* 2025
- Leader of the Regulatory and Investigations Team of the Year, Middle East Legal Awards 2024
- Recommended as a "Thought Leader" for Business Crime Defence and Investigations by *Who's Who Legal* 2024
- Recognized as a "Leading Partner" across Europe, the Middle East and Africa for Compliance and Investigations by *Legal 500 Europe, Middle East & Africa* 2024
- Recognized for Corporate Compliance & Investigations – UAE by *Chambers Global* 2024
- Leader of the Pro Bono Team of the Year, Squire Patton Boggs Pro Bono Awards 2023
- Recommended as a "Global Leader" for Business Crime Defence and Investigations by *Who's Who Legal* 2023
- Recognized as a "Leading Lawyer" across Europe, the Middle East and Africa for Compliance and Investigations by *Legal 500 Europe, Middle East & Africa* 2023
- Recognized for Corporate Investigations – UAE by *Chambers Global* 2023
- Recommended as a "Global Leader" for Business Crime Defence by *Who's Who Legal* 2022
- Recognized as a "Leading Lawyer" across Europe, the Middle East and Africa for Compliance and Investigations by *Legal 500 Europe, Middle East & Africa* 2022
- Recognized for Corporate Investigations – UAE by *Chambers Global* 2022
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- Recognized for Corporate Investigations – UAE by *Chambers Global* 2021



- Recognized as a “Leading Lawyer” across Europe, the Middle East and Africa for Compliance and Investigations by *Legal 500 Europe, Middle East & Africa* 2020
- Recognized for Corporate Investigations – UAE by *Chambers Global* 2020
- Recognized for US Regulatory and Sanctions by *Legal 500 Europe, Middle East & Africa* 2019
- Recognized for Corporate Investigations – UAE by *Chambers Global* 2019
- Recognized for Government Investigations by *Legal 500 Europe, Middle East & Africa* 2018

## Expertise

## Speaking Engagements

### Services

- Government Investigations & White Collar
- Financial Crime Risks of Global Polarization and De-Dollarization, 42nd Cambridge International Symposium on Economic Crime, Cambridge (UK), September 3, 2025.
- How Automation Is Changing the Game, Next Generation Financial Crime Compliance Conference, Dubai (UAE), May 29, 2025.
- AML, Sanctions, and Embargo Compliance, GRC (Governance, Risk and Compliance) Today 2024 Summit, Dubai (UAE), October 3, 2024.
- Key Considerations for Submitting Effective SARs/STRs, School of International Financial Services (SIFS) Financial Crime Prevention Series, Dubai (UAE), May 27, 2024.
- Considerations for Fast-moving Consumer Goods (FMCG) Businesses from Europe to the UAE, Council of Slovak Exporters Event, Dubai (UAE), April 24, 2024.
- Interactive Masterclass on Compliance Risk Management and How To Deal Effectively with Sanctions, Kazakhstan National Forum on Corporate Governance, Astana (Kazakhstan), December 7, 2023.
- Specialist Training Session on the Impacts of Sanctions and Political Exposure in Correspondent Banking, Pasha Bank International Conference on Legal & Compliance Challenges in the Digital Era, Baku (Azerbaijan), October 11, 2023.
- Legal and Compliance as Key Elements of Sustainable Development, Pasha Bank International Conference on Legal & Compliance Challenges in the Digital Era, Baku (Azerbaijan), October 11, 2023.
- International AML/CFT and Sanctions Compliance Best Practices, Kazakhstan Compliance & Business Ethics Association, Astana (Kazakhstan), March 28, 2023.
- Sanctions and Compliance in the Middle East, Global Investigations Review (GIR) Middle East Connect Conference 2021, Dubai (UAE), November 23, 2021.
- UAE Ethics: How Multinationals are Calibrating Internal Controls and Compliance Protocols, C5 Advanced Conference, Zürich (Switzerland), April 4, 2019.
- Legal Issues in Financial Crime Cases, Deloitte Regulatory and Financial Crime Conference 2018, Dubai (UAE), April 18, 2018.
- How to Deal with Public Officials When Doing Business in EMEA, Anticorruption Compliance EMEA Summit, Dubai (UAE), November 12, 2015.
- How to Deal with Cross Region Investigations & Extradition Treaties between Countries, Anticorruption Compliance EMEA Summit, Dubai (UAE), November 11, 2015.
- Anticorruption Boot Camp, Global Legal ConfEx, Dubai (UAE), October 7, 2015.

- Masterclass on High Profile Enforcement Actions & Government Investigations, Global Legal ConfEx, Dubai (UAE), October 7, 2015.

## About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.