



## *Claire M. Guehenno*

**PARTNER**

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Claire Guehenno focuses her practice on government and internal corporate investigations, and other criminal and enforcement matters. She has represented global corporations, financial institutions, and individuals in civil and criminal investigations before the Department of Justice, the Securities and Exchange Commission, the Federal Trade Commission, and other domestic and foreign government authorities.

Ms. Guehenno advises clients in times of crisis, leveraging experience across a wide range of matters, including matters related to the securities laws, Foreign Corrupt Practices Act, insider trading, money laundering, environmental statutes, honest service fraud, the False Claims Act, and wire fraud. She has extensive international experience representing clients around the world and leveraging her language skills, including her native French. She regularly counsels clients on matters involving complex cross-border questions and differing legal regimes, including issues involving cultural property.

In addition to her government-facing work, Ms. Guehenno has conducted numerous internal investigations, advising companies on compliance-related issues and best practices. She has worked with companies in a variety of sectors, including technology, social media, financial services, mining and energy, transportation, healthcare, and cryptocurrency.

Ms. Guehenno also devotes significant time to her pro bono practice, focusing on immigration matters and representing indigent clients who need help navigating the complexities of our legal system.

### *Past Experience*

Prior to joining WilmerHale, Ms. Guehenno clerked for the Honorable Richard J. Sullivan of the United States District Court for the Southern District of New York and the Honorable John M. Walker, Jr., of the United States Court of Appeals for the Second Circuit.

While attending law school, Ms. Guehenno was co-editor-in-chief of the *Harvard International*

From 2009 to 2011, Ms. Guehenno worked as a paralegal specialist in the Criminal Division of the United States Attorney's Office for the Southern District of New York.

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## *Solutions*

Artificial Intelligence

Foreign Corrupt Practices Act  
and Anti-Corruption

Securities Enforcement

Crisis Management and  
Strategic Response

Investigations

White Collar Defense and  
Investigations

Cross-Border Investigations  
and Compliance

Litigation

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## *Experience*

A select list of Ms. Guehenno's recent experience includes:

- Representing a commodity trading and mining company in wide-spanning FCPA and market conduct investigations involving multiple government authorities, including the DOJ, UK, Brazilian, Swiss, and Dutch authorities, and conduct around the world.
- Conducting an investigation for a major technology company in connection with potential bribery tied to its business in the Democratic Republic of Congo.
- Representing a global food company in an internal investigation related to its West Africa supply chain.
- Advising a major US museum in government investigations relating to cultural property issues, including in several inquiries relating to the potential return of objects to their country of origin.
- Representing an advertising platform in connection with parallel DOJ, SEC, and FTC investigations.
- Representing a social media company in connection with DOJ and SEC investigations arising out of whistleblower complaints.
- Conducting a review of the foreign operations of a US government agency.
- Representing individuals in money laundering, FCPA, insider trading, and False Claims Act investigations.
- Representing an individual in a four-week trial in the Southern District of New York on charges that included honest services wire fraud and money laundering.

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## Recognition

- Selected for inclusion in *Best Lawyers: Ones to Watch* for white collar criminal defense (2021–2024) and appellate law (2023–2024).

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## Credentials

### EDUCATION

JD, Harvard Law School, 2014

*cum laude*

*Co-Editor-in-Chief, Harvard  
International Law Journal,  
Board of Student Advisors*

BA, Social Studies, Harvard  
College, 2009

*magna cum laude*

### ADMISSIONS

New York

### CLERKSHIPS

The Hon. Richard J. Sullivan,  
US District Court for the  
Southern District of New York,  
2015 - 2016

The Hon. John M. Walker Jr.,  
US Court of Appeals for the  
Second Circuit, 2014 - 2015

### LANGUAGES

French

Spanish