SpencerFane®


# John P. Cunningham

Partner

**Contact**

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## Overview

**John Cunningham represents companies and individuals in criminal, civil, and regulatory proceedings involving allegations of fraud, corruption, money laundering, embezzlement, sanctions violations, and other compliance-related issues. In addition to his comprehensive role as a litigator and advisor, he regularly develops robust corporate compliance programs aligned with all U.S. and international requirements.**

With more than 25 years of focused legal experience in the public and private sectors, John spent a decade of his early career as a senior trial attorney for the U.S. Department of Justice (DOJ) and as an investigator for the FBI Criminal Division. His extensive background working within and before the DOJ, FBI, U.S. Securities and Exchange Commission (SEC), Financial Crimes Enforcement Network (FinCEN), Office of Foreign Assets Control (OFAC), U.S. Customs and Border Protection (CPB), and other federal agencies contributes to his sharp and agile legal acumen when handling high-stakes government investigations, defending against enforcement actions, maintaining compliance, and managing litigation risk across a wide range of industries.

John focuses on providing his clients with strong yet customizable strategies for the most proactive litigation and dispute resolution tactics that also prioritize their unique needs and objectives.

## Education

- University of Richmond School of Law (J.D.), *cum laude*
- The George Washington University (M.A.), *summa cum laude*
- College of William & Mary (B.A.)

## Bar Admissions

- District of Columbia
- Virginia

## Court Admissions

- U.S. Supreme Court
- U.S. Court of Appeals for the Fourth Circuit
- U.S. District Court for the Eastern District of Virginia
- U.S. District Court for the District of Columbia

## Community Involvement

- Disabled American Veterans and Veterans of Foreign Wars, Pro Bono Advocate
- Alexandria-Fairfax (Virginia) Alumni Chapter of Kappa Alpha Psi Fraternity, Inc., Kamp Kappa Legal Program, Counselor
- After School Enrichment Matters (ASEM), Fundraising Committee
- Lost Dog and Cat Rescue Foundation, Donations Team, Volunteer

## Distinctions

- Virginia State Bar, Access to Justice Commission, Pro Bono Service Honor Roll, 2022, 2023
- NYSE Global Corporate Crime Legal Trends Leader, 2017

## Memberships

- American Bar Association, Compliance Section; Criminal Justice Section
- Federal Bar Association
- Association of Corporate Counsel
- Association of Certified Anti-Money Laundering Specialists
- Society of Corporate Compliance and Ethics

## Presentations and Publications

- "How Cos. In China Can Tailor Compliance Amid FCPA Shifts," *Law360*, August 2025
- "Rapidly Evolving AML Risk: Tenets of Proactive Compliance," American Bankers Association, 2022
- "U.S. Capital Markets: Evolving SEC, CFTC, AML, IRS Regulation of Digital Assets," Dubai International Financial Centre, 2021
- "Flexibility and Vigilance: Effectively Manage Government and Internal Investigations," *com Corporate Counsel*, 2020
- "Revised DOJ Guidance Provides Meaningful Compliance Road Map," *Law360*, 2020
- "Updated DOJ-SEC FCPA Resource Guide Provides Enriched Clarity to Businesses," *Law360*, 2020
- "Five Essential Elements of Corporate Compliance: A Global Template," *BM Publishing*, 2011, 2015, 2018
- "Risk Assessment in India: Challenges & Best Practices for Anti-Corruption and Anti-Money Laundering," *Review of Banking & Financial Services*, 2015

## Related Experience

- Conducted and successfully resolved comprehensive anti-corruption, anti-money laundering, sanctions, fraud, forfeiture, and immigration-related internal or government investigations for multiple Fortune 500 companies across industry sectors.

- Advocated to obtain advantageous outcome for global services firm in extensive DOJ, FBI, and SEC multi-agency investigation for alleged fraud and internal controls issues.
- Directed and engineered board-mandated compliance evaluations and corresponding program enhancements for U.S. and multinational corporations in various industries.
- Designed, implemented, and effectively defended U.S. and international compliance programs for consulting, financial services, products, technology, hospitality, private equity, IT, engineering, retail, aerospace, life sciences, and medical device companies.
- Performed fulsome anti-corruption, anti-money laundering, trade sanctions, fraud, and third-party risk assessments for over 50 corporations, culminating in recommended and executive-approved corporate risk mitigation measures, policies, and controls.
- Led FCPA, anti-money laundering, sanctions, general compliance, and related pre- and post-acquisition due diligence projects for a multitude of M&A transactions, resulting in successful client mergers, acquisitions, and joint ventures.
- Investigated and favorably resolved federal individual prosecutions for FCPA, money laundering, health care fraud, counterfeiting, immigration fraud, and forfeiture allegations.

**Clerk Experience:**

- Honorable Gerald B. Lee, U.S. District Court for the Eastern District of Virginia