



Eleanor Davison

Call 2003

"Has strong analytical skills and is very good with clients." "She has excellent judgement."

Chambers & Partners

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Eleanor Davison specialises in international civil and criminal fraud, bribery, money laundering, market abuse and insider trading, sanctions and banking, financial services, regulatory and disciplinary investigations.

She is described as “a brilliant lawyer” and “a delight to work with” with “a rare expertise in both financial services regulation law and those aspects of criminal law which engage with regulated financial activity,” and is recommended in various legal directories including in *Who's Who Legal* where she is listed as a future leader in investigations.

Eleanor's advocacy experience spans the Commercial Court, the Crown Court and criminal Appellate Court, the FCA, and other regulatory and disciplinary tribunals. Her practice includes a range of interim applications and other matters including civil and criminal search orders, freezing injunctions, directors' duties and liabilities, internal investigations, company announcements, corporate self-reports and deferred prosecution agreements, unexplained wealth orders, legal privilege, privacy and confidentiality, sanctions and criminal confiscation and compliance with requests for mutual legal assistance.

She is instructed by government, enforcement agencies (the Serious Fraud Office – Prosecution Counsel A Panel, the Financial Conduct Authority, the Prudential Regulatory Authority and other regulators) as well FTSE100/250 companies and high net worth individuals. Uniquely, she has been seconded to a FTSE 100 financial institution in legal and compliance, spent 18 months at the FCA instructed as senior external counsel by the Enforcement division in the Standard Chartered Bank (Standard Chartered) whilst also acting for those within the regulated sector.

Recent Highlights

Bank of England (Prudential Regulatory Authority) Citigroup Global Markets Limited, Citibank N.A. London branch & Citibank Europe Plc UK branch

Advising the Bank of England in its PRA's first case against a category 1 systemically important institution for failings in relation to internal controls and governance arrangements underpinning compliance with PRA regulatory reporting requirements.

Re the Post Office (Horizon)

Advising in relation to the Business, Enterprise and Industrial Strategy investigation regarding the Post Office's Horizon IT platform.

Dame Linda Dobbs Review

Acting as specialist financial crime and financial services counsel to the review into whether the issues relating to HBOS Reading were investigated and appropriately reported to authorities at the time by Lloyds Banking Group.

FCA & Standard Chartered Bank

Acting in this case where the second largest financial penalty for AML control failings was imposed by the FCA.

SFO v Barclays Plc & Barclays Bank Plc

Acting in the criminal, regulatory and civil cases arising from the 2008 share issuance.

Expertise

Commercial Crime

Eleanor's expertise in cross border criminal and regulatory investigations is unrivalled. She has expertise in all areas of financial crime including advising firms being investigated by the SFO and those which may be seeking a Deferred Prosecution Agreement. She also advises on compliance with money laundering and sanctions regimes, with requests under the Crime (International Co-operation Act) 2003, as well as third party disclosure issues. Her practice also extends to enforcement cases.

Eleanor also has a strong Health and Safety practice defending corporations. She was instructed for the defence in the first Corporate Manslaughter prosecution *R v Cotswold Geotech* and regularly acts for companies and individuals charged with offences under the Health and Safety at Work Act.

Eleanor was also instructed by Berrymans Lace Mawer in a health and safety and personal injury case arising from an accident on the James Bond film set of *A Quantum of Solace*.

Notable Commercial Crime cases

Acting for the Home Office in a cross border world bank investment which raised issues relating to sanctions, money laundering and terrorist financing.

Acting for the Department for International development (now the Foreign, Commonwealth and Development Office) in a cross border world bank investment which raised issues relating to sanctions, money laundering and terrorist financing.

The Dame Linda Dobbs Review: Acting as specialist financial crime and financial services counsel to the review into whether the issues relating to HBOS Reading were investigated and appropriately reported to authorities at the time by Lloyds Banking Group.

Acting for the private investment arm of DFID regarding financial crime concerns on a World Bank Investment in Sierra Leone.

SFO v Barclays Bank Plc

Acting for the corporate in the SFO and FCA proceedings as well as the civil case brought by PCP for six years.

SFO v A Company

Acting for a multinational corporate in the construction sector in a bribery and competition law investigation.

Advising law firms on production in response to requests for material from overseas prosecutors under the Crime (International Co-operation) Act 2003.

Advising an insurer on the risks associated with insuring medicinal and recreational cannabis in the UK and abroad.

SFO v A Bank

Advising on the first ever warrant application for privileged material brought against a corporation in the UK which engaged complex argument on privilege and corporate liability.

Re BB Plc

Acting in a criminal and regulatory global Libor investigation.

Acting for a bank in the global Forex investigations.

Advising Credit Suisse on a range of matters from criminal investigations to third party disclosure obligations.

Commercial Crime - Health, Safety & Environment

Eleanor also has a strong Health and Safety practice defending corporations and regularly acts for companies and individuals charged with offences under the Health and Safety at Work Act.

Notable Commercial Crime - Health, Safety & Environment cases

R v Cotswold Geotech

Instructed for the defence in the first Corporate Manslaughter prosecution.

James Bond film set of A Quantum of Solace

Instructed by Berrymans Lace Mawer in a health and safety and personal injury case arising from an accident on set.

Commercial Disputes

Eleanor acts in the County Court and the High Court on civil fraud matters as well as in pure commercial disputes. She has experience in the aviation sector and has acted in a high value contractual dispute between two national airlines. She regularly acts in case management hearings and pre action disclosure applications as well as settling pleadings.

Financial Services

Eleanor is recognised as a leading junior in financial services law. She is instructed by the FCA, companies and individuals on enforcement actions as well as compliance with the FCA's regulatory requirements. Eleanor's expertise in this area is highly sought after as she led an internal FCA investigation for Enforcement for 18 months. Eleanor was seconded to group litigation at Barclays Bank providing invaluable knowledge of how a major banking institution functions.

Eleanor regularly advises senior executives on FCA compliance including those holding positions under the Senior Managers Regime.

Notable Financial Services cases

Advising the Bank of England in its PRA's first case against a Category 1 PRA-regulated firm (i.e. a systemically important institution) for failures in its regulatory reporting systems, controls and governance arrangements.

Acting as senior external counsel instructed by the Enforcement Division of the FCA in the Standard Chartered Bank (Standard Chartered) case where the second largest financial penalty for AML control failings was imposed by the FCA in a case that involved considerable cross border co-operation. Her role included leading a team of

investigators, including 8 other counsel, to assess evidence on financial crime risk; as well as drafting internal memos to brief the head of enforcement, Mark Steward, on novel investigative points. Eleanor's role, leading part of the case team, was very unusual and has given her an unrivalled insight into how Enforcement investigates and prepares a case.

Statutory ring fencing schemes

Advising two banks on the interaction of the ring fencing scheme with the requirements of the Proceeds of Crime Act 2002, with Michael Moore KC, Erskine Chambers.

Acting as specialist financial crime and financial services counsel to The Dame Linda Dobbs Review, which is considering Lloyds Banking Groups regulatory reporting obligations.

FCA v AB

Appeared in the RTC in this change in control matter led by Andy George KC.

Acting for a banking institution in respect of the FCA FOREX and LIBOR investigations.

Acting for Barclays Bank in respect of concurrent SFO, FCA, DOJ, SEC and FED investigations into the 2008 capital raisings from Qatar.

Advising a bank on the application of PRA guidance relating to malus and remuneration.

Advising a client in respect of asset recovery for funds allegedly taken by an IFA.

Advising a financial institution in respect of s166 reports.

Advising on non-contentious and other matters such as change in control issues.

Directory Quotes

"Eleanor Davison is an accomplished junior counsel with a respected practice at the intersection of criminal law and civil regulatory matters. Her astute advice is highly valued by household-name financial institutions, and she is also noted for frequently counselling the FCA." "A very good operator."

Chambers & Partners

"She is hard-working, well organised, and does not jump to conclusions until she is comfortable that she has sufficient facts."

Chambers & Partners

"A first rate lawyer who spots every legal point that might be taken on behalf of her client, and argues the point fully."

Legal 500

"Has a phenomenal brain and in-depth knowledge of her area of expertise. She is quick-witted, alert to opposing arguments and a delight to work with - a real star to watch."

Chambers & Partners

"Eleanor is excellent at team-working and explaining difficult matters to clients."

Chambers & Partners

"Eleanor provides top-notch client service. She has a sharp intellect, combined with an effortlessly humble approach to stakeholder engagement - not afraid to ask astute questions in order to shape her advice accordingly, and always on top of the detail."

Legal 500

"A brilliant lawyer, she combines a rare expertise in both financial services regulation law and those aspects of criminal law which engage with regulated financial activity."

Legal 500

"Energetic, intellectual and decisive. She has a good knowledge of substantive law in this area and solicitors like her approach."

Legal 500

"A strong team player with superb communication skills who provides high-quality input under challenging conditions. She has an impressive record of counselling clients from the financial services industry facing multi-jurisdictional, multi-agency investigations. Her areas of expertise include market manipulation and money laundering allegations."

Chambers & Partners

Directory Rankings

Chambers & Partners

- Financial Crime
- Financial Crime: Corporates
- Financial Services (Band 1)

Legal 500

- Business & Regulatory Crime (including Global Investigations) (Tier 1)
- Financial Services Regulation
- Proceeds of Crime Act & Asset Forfeiture

Education

- MA, Bristol University
- BA, Warwick University

Appointments, Memberships and Prizes

- Appointed as a Recorder of the Western Circuit, as of 30 May 2023
- Appointed to the Bar Standards Board Advisory Pool of Experts (APEX) on Money Laundering Regulations
- Serious Fraud Office Prosecution Counsel Panel A
- Fraud Lawyers Association
- Financial Services Lawyers Association
- Lord Denning Scholar, Lincoln's Inn
- Thomas More Scholar
- Peter Duffy Scholarship to the European Court of Justice & European Court of Human Rights

Publications

- Co-editor of the *Practitioner's Guide to Global Investigations* with Clifford Chance, Ropes and Gray and Outer Temple Chambers now in its third edition.
- Editorial Board of *Lloyds Law Reports Financial Crime*.
- Eleanor regularly comments on corporate crime issues for Lexis Nexis.
- *Impact of Brexit* by Sir Francis Jacobs KC, Timothy Dutton KC, Richard Lissack KC, Bankim Thanki KC, Nicholas Medcroft KC, Robin Barclay KC, Tamara Oppenheimer KC, Eleanor Davison and Philip Ahlquist as published by GIR (July 2016).
- *Follow the money* – law firms and the pursuit of criminal assets by Eleanor Davison.
- Contributor to *Lissack and Horlick on Bribery*, 2014 and the forthcoming edition.
- In April 2015, Eleanor was listed in the *GIR Women in Investigations Survey* which highlighted 100 remarkable women in the profession from around the world. The survey 'profiles lawyers, government prosecutors, barristers, forensic accountants and various in-house counsel, all of whom can serve as inspirations to current and future generations of investigations professionals.' Eleanor is the only Barrister at the independent Bar in the UK to be listed in this comprehensive review which reflects on the strength of her practice in global corporate investigations work. To see Eleanor's entry [click here](#).
- *Butterworths Journal of International Banking & Financial Law* (JIBFL) April 2012.

Awards

