



# Robin Lööf

Call 2009

*"Clever, diligent, charming to deal with - a safe (and smooth) pair of hands."*

*The Legal 500*

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Robin Lööf is an experienced junior specialising in commercial crime, financial and trade sanctions, and financial regulation.

He is also a member of the Paris Bar and is polylingual. Clients have described Robin as "excellent", "extremely hard-working and clever", "dilligent" and "a safe (and smooth) pair of hands".

Robin primarily acts for companies and individuals facing criminal and/or regulatory investigations, particularly in relation to corruption, sanctions violations, money laundering, and financial regulatory violations.

Described as "one of the go-to barristers for AML/CTF regulatory advice", Robin has recent experience of acting for financial institutions subject of FCA enforcement action for AML failures, including in proceedings before the RDC.

Robin regularly advises on various aspects of sanctions regimes, in particular asset-freezes, under both UK and EU law. Robin also advises and acts for entities and individuals on challenging their designations under UK and EU sanctions regimes, including applications to the General Court of the EU.

Increasingly instructed in the context of civil and criminal litigation, Robin is particularly sought after to act in relation to contempt of court proceedings. He has recent experience advising on and acting in proceedings before offshore jurisdictions in the Gulf, including the first successful contempt of court application before the Abu Dhabi Global Market court.

Robin also frequently provides strategic advice to businesses seeking to mitigate compliance risks, particularly under the Proceeds of Crime Act 2002, be it as part of internal compliance reviews or M&A-related due diligence, or in relation to the structuring of business activities and regulatory interaction, particularly in the financial sector (e.g. the offering of cryptocurrency-related products and services, or the provision of banking services to high risk clients).

Robin started his career at the criminal bar after which he joined the white collar defence team of a large international law firm, working out of their London and Paris offices. As a qualified French lawyer, Robin is sought after to advise in cases involving cross-Channel issues. He is used to acting in multi-jurisdictional matters with experience of investigations in a number of jurisdictions, including the UK, the US and France. His French qualification means Robin can and does appear before EU courts and institutions and he has a particular interest in EU criminal law and the application of EU instruments of legal cooperation.

## Recent Highlights

Acting for a high net worth individual in relation to multi-jurisdictional investigations into money laundering and sanctions violations.

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Acting for a former foreign head of government facing corruption allegations.

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Acting in high-profile challenges to EU sanctions designations before the General Court of the EU.

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Acting for an aircraft leasing company in contempt of court proceedings in the Commercial Court.

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Representing a brokerage before the FCA's Regulatory Decisions Committee in a challenge to a proposed financial penalty for AML failures.

## Expertise

### Commercial Crime

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#### Notable Commercial Crime cases

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Acting for a high net worth individual in relation to multi-jurisdictional investigations into money laundering and sanctions violations (led by Richard Lissack KC).

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Advising former Caribbean head of government in relation to corruption allegations arising out of his time in office.

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Advising an academic institution on the application of export control rules to cross-border research co-operation involving potential military- and WMD use concerns.

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Advising a foreign company and directors in relation to allegations of crimes against humanity (led by Tim Dutton KC and Richard Lissack KC).

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Advising an exporter following a customs seizure of goods under the Russia sanctions regime.

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Advising provider of forensic intelligence in relation to information-gathering practices (led by Richard Lissack KC).

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Advising a tax advisory in relation to a money laundering investigation by HMRC.

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Advising companies involved in logistics, commodities brokerage, and real estate on the implications of recently imposed and extended sanctions regimes.

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Advising an Eastern European businessman in challenging conclusions in a UN Security Council expert panel report into embargo violations.

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Advising a Bermudian physician in a challenge to his arrest and the search of his home which led to their quashing by the Bermuda Supreme Court (*Sannapareddy v The Commissioner of the Bermuda Police Service* [2017] SC (Bda) 51 Civ (23 June 2017)), a decision upheld by the Bermuda Court of Appeal (*The Commissioner of Police v Sannapareddy* [2020] Bda LR 21 (20 March 2020)).

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Advising on several successful requests to delete INTERPOL Red Notices.

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Advising Société Générale in securing a deferred prosecution agreement and first coordinated resolution between the DOJ and France's Parquet National Financier regarding claims of potential corruption of foreign officials in Libya.

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Advising a former Prime Minister of an Asian country in relation to several investigations arising out of his time in office.

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Advising multiple directors of a central European financial services company in criminal, regulatory and civil proceedings in London, Jersey and elsewhere.

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Advising individuals in a challenge to a Crown Court Order freezing their assets at the request of a Middle Eastern government in the context of a multi-jurisdictional criminal investigation (including appeal to the Court of Appeal: *A & A v Director of Public Prosecutions* [2016] EWCA Crim 96).

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Advising a hedge fund in allegations of market abuse and criminal investigations in three countries.

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Advising a Monegasque bank targeted by a production order relating to several of its clients in the context of a multinational bribery and money laundering investigation.

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Managing an investigation into suspected VAT-related misconduct by the West African subsidiary of a UK Plc.

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Advising several listed UK, European, and US companies in investigations into suspected misconduct in subsidiaries.

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## Commercial Disputes

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### Notable Commercial Disputes cases

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Acting for an Emirati healthcare provider in contempt proceedings against a local financial institution in the context of insolvency proceedings before the Court of First Instance of the Abu Dhabi Global Market (led by Richard Lissack KC; [2023] ADGMCFI 0003); [2023] ADGMCFI 0016).

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Acting for an aircraft leasing company in contempt proceedings against a south-east Asian airline (led by Richard Lissack KC).

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Acting for a European engineering contractor in a USD 1billion+ dispute arising out of the termination of a large infrastructure project in the context of the imposition of EU restrictive measures (led by Michael McLaren KC, with Christopher Knowles).

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Acting for an investment company in a claim for breach of contract involving alleged violations of a non-disparagement clause in a financing agreement (led by Richard Lissack KC).

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Advising numerous law firms in relation to acting on behalf of sanctioned entities.

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Advising several parties to litigation on the application of English privilege rules to their disputes.

## Financial Services

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### Notable Financial Services cases

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Acting for a several financial institutions in FCA enforcement actions for violations of anti-money laundering systems and controls requirements, including in a recent successful challenge to the RDC against a proposed financial penalty (led by Robin Barclay KC).

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Acting for an offshore financial regulator in precedent-setting enforcement proceedings.

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Advising an outsourcing company on regulatory requirements for debt recovery and payment services.

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Advising an insurance company in a successful informal settlement with the FCA relating to long-standing allegedly unfair consumer contract terms.

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Advising Russian-owned UK Ltd on securing auditors following refusal by insurers to extend PII for audit work.

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Advising insurance companies on the winding down of transactions with sanctioned entities under an OFSI general licence.

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Advising a plc on a complaint to the FCA on violations of regulations around margin trading (led by Richard Lissack KC).

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Advising financial institutions on whether customer entities are “owned and controlled” by persons designated under UK and EU asset-freezing legislation.

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Advising a large Middle Eastern bank on the jurisdictional competence of an offshore financial regulator (led by Bankim Thanki KC).

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Advising a large crypto exchange on its application for registration under the MLR 2017 and attendant AML programme modifications.

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Advising a crypto wallet provider on the structuring of its general terms and conditions (including their articulation with French law), as well as the terms and conditions of a crypto credit product offer.

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Advising the London branch of a foreign bank on its obligations in relation to deposits by the Afghanistan central bank following the Taliban takeover, including considerations of financial sanctions, anti-money laundering and counter-terrorist financing laws.

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Advising a crypto exchange on the FCA's refusal to authorise.

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Advising two financial services providers on their AML and sanctions policies.

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Advising employees of a leading investment bank in US and UK investigations into alleged manipulation of the foreign exchange market.

## Sanctions

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### Notable Sanctions cases

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Acting in high-profile challenges to EU designations before the General Court of the EU.

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Representing a high profile former Eastern European politician in an application to the General Court of the EU to annul his sanctions designation.

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Advising a Middle Eastern businessman on challenging his EU sanctions designation.

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Advising several persons on challenges to their UK sanctions designations (alone and led by Clare Sibson KC).

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Advising companies involved in logistics, commodities brokerage, and real estate on the implications of recently imposed and extended sanctions regimes.

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Advising an Eastern European businessman in challenging conclusions in a UN Security Council expert panel report into embargo violations.

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Advising numerous law firms in relation to acting on behalf of sanctioned entities.

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Advising Russian-owned UK Ltd on securing auditors following refusal by insurers to extend PII for audit work.

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Advising financial institutions on whether customer entities are “owned and controlled” by persons designated under UK and EU asset-freezing legislation.

## AI, Crypto & Technology

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### Notable AI, Crypto & Technology cases

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Advising a crypto wallet provider on the structuring of its general terms and conditions (including their articulation with French law), as well as the terms and conditions of a crypto credit product offer.

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Advising a fintech in relation to the UK regulatory status of the cryptocurrency it created.

## Directory Quotes

*“Excellent.”*

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The Legal 500

*"Extremely hard-working and clever."*

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The Legal 500

*"Robin is extremely knowledgeable and one of the go-to barristers for AML/CTF regulatory advice. He is commercial and quick to assist, is excellent with clients and a pleasure to work with."*

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The Legal 500

## Directory Rankings

The Legal 500

- Financial Services Regulation

## Education

- BVC, College of Law, London (2009)
- PhD, European University Institute (2008)
- Maîtrise en droit, Université Paris II Panthéon-Assas (2004)
- MA, University of Cambridge (2004)

## International Bar / Court Appointments

- Called to the Paris Bar (2017)

## Appointments, Memberships and Prizes

- Member of the European Criminal Bar Association (and its EPPO Working Group)
- Member of the Fraud Lawyers Association
- Lincoln's Inn Lord Denning Scholar
- Lincoln's Inn Hardwicke Scholar

- Runner-up, 2009 Inner Temple Inter-Varsity mooting competition
- Winner, 2008-2009 College of Law BVC mooting competition
- Winner, 2005-2006 European Law Moot Court Competition (best Advocate General)

## Publications

- Case Reporter and Commentator for *LLR: Financial Crime*
- Failure to prevent fraud: making up for failure to prosecute? *Butterworths Journal of International Banking and Financial Law* (June 2023) (with Richard Lissack KC)
- The Law Commission Options Paper: doubtful progress on reforming corporate criminal liability, [2022] *Crim. L. R.* 814
- “*Internal investigations nel Regno Unito*” in *Investigazioni interni – Poteri | Diritti | Limiti | Responsabilità*, Enrico Di Fiorino and Giuseppe Fornari (eds.), Pacini Giuridica (2022), at pp. 173-192. DPAs – Judicial oversight restated, (2021) 7 *Arch. Rev.* 4. (See news piece [here](#))
- The EPPO and the Corporate Suspect – Jurisdictional Agnosticism and Legal Uncertainties, *eu crim* 4/2020, 310
- Corporate Agency and White Collar Crime—An Experience-led Case for Causation-based Corporate Liability for Criminal Harms, [2020] *Crim. L. R.* 275
- Obtaining, Adducing and Contesting Evidence from Abroad—a Defence Perspective on Cross-border Evidence, [2011] *Crim. L. R.* 40
- *EU Criminal Law and Justice*, Edward Elgar (2008), with Maria Fletcher and Bill Gilmore
- *Temporal Aspects of the Duty of Consistent Interpretation in the First and Third Pillars*, 32(2007) *ELJ* 888
- 54 CISA and the Principles of *ne bis in idem*, (2007) *EJCCLCJ* 309
- *Shooting from the Hip: Proposed Minimum Rights in Criminal Proceedings throughout the EU*, 12:3 (2006) *ELJ* 421

## Languages

- French (fluent)
- German (working knowledge)
- Italian (professional)
- Spanish (working knowledge)
- Swedish (fluent)

## Awards



