



1330 Connecticut Avenue, NW  
 Washington, DC 20036  
 TEL: 202.429.8013  
 FAX: 202.429.3902  
 wgordon@steptoe.com

**Areas of Practice**

FCPA/Anti-Corruption  
 Export Controls  
 International Regulation & Compliance  
 Worldwide Arbitration & Dispute Resolution

**Languages**

Spanish

**Education**

Harvard Law School, J.D.,  
 cum laude, 2007  
 Pomona College, B.A.,  
 2002

**Bar & Court Admissions**

District of Columbia  
 Massachusetts

**William T. Gordon**

William T. Gordon is an associate in Steptoe's Washington office, where he is a member of the International Department. His practice includes anti-corruption and export control internal investigations and the development of effective compliance controls and strategies. Mr. Gordon also has significant litigation experience, including white-collar criminal defense and commercial disputes.

**Anti-Corruption**

Representing clients before a number of enforcement agencies and bodies, such as the US Department of Justice, the Securities & Exchange Commission, the World Bank, and the Inter-American Development Bank in criminal, civil, and administrative proceedings, Mr. Gordon assists companies in complying with anti-corruption regulatory regimes, including the Foreign Corrupt Practices Act and related anti-corruption laws. He frequently works on criminal and civil corporate compliance matters in Africa, the Middle East, South America, Europe and Australia in a variety of industries including oil services, transportation, telecommunications, engineering, construction, manufacturing and pharmaceutical.

**Export Controls**

In addition to counseling companies on general export compliance programs and policies, Mr. Gordon advises clients regarding compliance with US export controls, including the International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR). He has experience registering companies with and submitting material change notifications to the Directorate of Defense Trade Controls (DDTC), preparing commodity jurisdiction requests, assisting with reviews of apparent regulatory infractions, drafting voluntary disclosures, and making export classification determinations under the EAR. This work has involved communications with government officials in the primary regulatory agencies, including the US Departments of State, Commerce, and Defense.

**Litigation and Arbitration**

Mr. Gordon assists in the representation of companies in investor-state arbitration proceedings. His white collar experience includes complex cases involving military contractors and anti-corruption issues and his commercial dispute practice includes antitrust and insurance matters.

**Pro-bono**

Active in Steptoe's pro bono efforts, Mr. Gordon is frequently called upon to analyze international corruption cases for international transparency advocates.

**William T. Gordon**

**Selected Publications**

Anti-Corruption Year in Review 2011  
March 6, 2012

“State-Owned Enterprises” Under the FCPA  
June 3, 2011

FCPA Self-Reporting and the Effects of the Dodd-Frank Whistleblower Provisions: A New Calculus  
May 5, 2011

FCPA Year in Review 2010  
March 15, 2011

International Law Advisory - Flurry of FCPA Cases Closes Out 2009; Enforcement Continues Apace in Early 2010  
March 16, 2010

Private Investor Frederic Bourke Sentenced to Prison and \$1 Million Fine  
November 16, 2009, *International Law Advisory*

International Law Advisory - SEC Adopts Several Expansive Applications of the Federal Securities Laws in the Recent FCPA Enforcement Action Against Nature's Sunshine and Two Senior Executives  
September 8, 2009

International Law Advisory - Private Investor Convicted for Involvement in Scheme to Bribe Officials in the Republic of Azerbaijan  
July 22, 2009