



## Bill Martin

Counsel

New York  
D: +1-212-728-5942  
wmartin@omm.com

William Martin has a wealth of government and private practice experience that enables him to guide companies, audit and special committees, officers and directors, and others in connection with internal investigations, government and regulatory inquiries and enforcement actions, and litigation.

A former senior counsel in the US Securities and Exchange Commission's Market Abuse Unit, Bill has investigated and prosecuted securities cases involving matters such as insider trading, market structure practices, the Foreign Corrupt Practices Act (FCPA), failure-to-supervise, investment advisors, and cybersecurity. In these matters, Bill worked closely with, among others, the Justice Department, FBI, IRS, and FINRA.

Before entering public service, Bill spent six years in the litigation practice of a major New York law firm, advising clients in shareholder derivative and securities litigation and investigations. His practice included a significant cross-border component and notable litigation brought under the FCPA.

## Experience

### Private Practice Experience

- Represented a global bank in cross-border tax fraud in DOJ, SEC & IRS investigations; prepared for trial on enforcement of IRS "John Doe" summons
- Represented a US bank in separate investigations by DOJ, OCC, Federal Reserve, FDIC, multiple state AGs, and congressional committees into alleged foreclosure and mortgage servicing deficiencies

## Admissions

### *Bar Admissions*

New York

### *Court Admissions*

US Court of Appeals, Second Circuit  
US District Court, Eastern and Southern Districts of New York

## Education

University of Chicago Law School, J.D., *with honors*; Comment Editor, *University of Chicago Law Review*  
Woodrow Wilson School, Princeton, M.P.A., Domestic Public Policy  
Carleton College, B.A., *magna cum laude*, Economics and Political Economy

- Defended major corporation against shareholder securities fraud claims, derivative and books and records cases brought against it in state and federal court relating to potential FCPA violations and/or rejected merger offer; won five dismissals

#### **Selected Government Experience**

- FCPA, internal accounting controls, and books and records action related to conduct in India, China, and Kuwait
- Insider trading action with profits in excess of \$40 million
- Investigated and led enforcement action charging antifraud violations of the Securities Exchange Act of 1934 and the Investment Advisers Act of 1940

#### **Government Experience**

- Senior Counsel, Division of Enforcement, Market Abuse Unit, US Securities and Exchange Commission (2015-2019)

#### **Professional Activities**

##### **Clerkships**

- Honorable Chester J. Straub, US Court of Appeals, Second Circuit
- Honorable P. Kevin Castel, US District Court, Southern District of New York

##### **Author**

- “Dismantling the SEC’s Federal Court Disgorgement Authority,” *New York Law Journal* (January 10, 2020)
- “The SEC’s Crypto Moves are at Odds with its Own Mission,” *PaymentsSource* (July 2019)
- “Is SEC disgorgement endangered? Supreme Court to decide,” *Investment News* (June 2019)
- “DC Circuit Upends SEC’s Low ‘Willful’ Standard for Securities Violation,” *Bloomberg Law* (May 2019)
- “Supreme Court Rules That Class Was Not Properly Certified Because Plaintiffs Did Not Establish That Damages Could Be Measures on a Class-wide Basis,” *Securities Reform Act Litigation* (April 2013)

#### **Honors & Awards**

- Three-time recipient of Director of Enforcement Division Award, Securities and Exchange Commission
- Paul R. Carey Award, Securities and Exchange Commission