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**AREAS OF PRACTICE**

FCPA/Anti-Corruption

International Regulation &  
Compliance

Worldwide Arbitration &  
Dispute Resolution

**LANGUAGE**

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 the Washington office of Steptoe & Johnson LLP, where he is a member of the International Department.

Mr. Gordon assists companies in complying with certain US regulatory regimes, including the Foreign Corrupt Practices Act and related anti-corruption and economic sanctions laws. He helps clients develop effective FCPA compliance strategies, including establishing internal policies and procedures. Mr. Gordon has assisted in conducting internal investigations and compliance audits in Africa, the Middle East, Mexico and Europe in a variety of industries including the oil services, transportation, telecommunications, and pharmaceutical industries. He has represented clients in FCPA matters before the Department of Justice (DoJ) and Securities and Exchange Commission (SEC).

In his international arbitration practice, Mr. Gordon assists in the representation of companies in investor-state arbitration proceedings, with particular experience on the damages phase of international arbitrations.

Mr. Gordon also has significant experience in white-collar criminal defense, having worked on several complex cases.

Finally, Mr. Gordon is active in Steptoe's *pro bono* efforts, most notably through analyzing international corruption cases for international watchdog groups.

**PUBLICATIONS**

High-Level Executives Targeted for FCPA Enforcement; Continued Scrutiny of Foreign Subsidiary Operations  
October 8, 2008

International Law Advisory - New Department of Justice FCPA Opinion Procedure Release Establishes a Limited Safe Harbor Against Successor Liability Based on Significant Undertakings by An Acquirer Regarding Its Post-Closing Conduct  
July 1, 2008

International Law Advisory - Willbros Group Agrees to Pay \$32.3 Million To Resolve DoJ and SEC FCPA Enforcement Actions  
May 21, 2008

Are You at Risk of Waiving the Attorney-Client Privilege by Using Your Employer's Computer Systems to Communicate With a Personal Attorney?  
May 1, 2008, *Digital Discovery & e-Evidence, Vol. 08, No. 05*

International Law Advisory - Recent Oil-for-Food Program Cases Show the Government's Willingness to Pursue "Improper" Payments Outside the FCPA's Antibribery Provisions, Call Attention to Foreign Enforcement  
March 17, 2008

**William T. Gordon**

International Law Advisory - Sight-Seeing Tiger, Hidden Dragon - Lucent  
Fined for Financing Sight-Seeing Trips for Chinese Officials  
February 1, 2008

International Law Advisory - Fifth Circuit Clarifies the Intent Requirements for  
a Criminal FCPA Conviction  
November 9, 2007

The Evolution of the Disparate Impact Theory of Title VII: A hypothetical case  
study  
44 Harvard Journal on Legislation 529, 2007