



## William P. Barry

MEMBER  
PRACTICE LEAD, WHITE COLLAR DEFENSE

William Barry is a trusted advisor to governments, boards of directors, foreign trustees, multinational companies and senior officers involved in cross-border business and the financial services industry. Mr. Barry helps solve complex problems involving multi-jurisdictional investigations, enforcement, compliance, and transactional issues so that his clients can overcome obstacles and resume focus on their business. He works with clients to address individual risks and to build credible, flexible and sustainable compliance infrastructure consistent with ESG standards.

wbarry@milchev.com  
(202) 626-5974

### PRACTICES

Anti-Money Laundering  
Complex Civil Litigation  
Economic Sanctions & Export Controls  
FCPA & International Anti-Corruption  
Internal Investigations  
Securities Enforcement  
Trust and Family Office  
White Collar Defense

### EDUCATION

- J.D.  
The George Washington University Law School  
1995
- B.A.  
Wesleyan University  
1991

Mr. Barry guides clients through the complex issues involved in responding to inquiries from domestic and international regulators regarding issues of accounting fraud, foreign bribery, money laundering, and other financial crimes. He represents clients faced with the challenge of responding to competing demands in parallel proceedings, such as internal reviews, government investigations, and private civil actions.

*Chambers USA* has described Mr. Barry as "the kind of person that everyone in the boardroom listens to" and noted he is "a very thorough thinker and very calm, and is the ideal ambassador for corporations when dealing with government agencies."

Mr. Barry is a member of the American Bar Association's International Anti-Money Laundering (AML) Committee and International Anti-Corruption Committee. He has been designated as a Certified Anti-Money Laundering Specialist by ACAMS, the Association of Certified Anti-Money Laundering Specialists.

Mr. Barry is a member of the Sustainability Accounting Review Board (SASB) Alliance.

Mr. Barry is a member of the Washington Lawyers Committee for Civil Rights and Urban Affairs, and the former Chairman of Olney Boys & Girls Club, a non-profit sports association in Maryland.

### REPRESENTATIVE ENGAGEMENTS

- Led independent investigation and interaction with the U.S. Department of Justice (DOJ) and U.S. Securities and Exchange Commission (SEC) on behalf of the audit committee of a Fortune 300 Latin-American national oil company in connection with allegations of cost overruns, corruption, and internal control deficiencies.
- Led independent investigation and interaction with the DOJ and SEC on behalf of the audit committee of a multi-national agro-business with operations in Latin America and EMEA in connection with allegations regarding corporate acquisitions, product quality and environmental controls, and interactions with government officials.
- Defended an offshore trustee company with respect to a criminal tax investigation involving the DOJ and regulators in multiple offshore jurisdictions.

- Advised a German manufacturing company regarding an internal review of allegations of corruption related to its Swiss operations and the use of third-party agents, as well as compliance with U.S. economic sanctions matters.
- Represented the audit committee of a global asset manager in conducting an independent investigation and interacting with U.S. regulators regarding allegations of FCPA violations, economic sanctions, and money laundering in connection with investments in North Africa and Sub-Saharan Africa.
- Represented the audit committee of a U.S.- and Canadian-listed public company regarding an independent investigation into revenue recognition and reserve accounting issues.
- Advised an offshore trustee with respect to U.S. economic sanctions, tax, and trust governance issues.
- Represented employees of non-U.S. bank in connection with an investigation by the Southern District of New York (SDNY) and the New York County District Attorney's Office (DANY) into potential violations of U.S. economic sanctions implemented under the Trading with the Enemy Act of 1917 (TWEA) and the International Emergency Economic Powers Act (IEEPA) and administered by the Office of Foreign Assets Control (OFAC).
- Represented the board of directors of a petroleum industry Fortune 100 multinational corporation headquartered in Brazil relating to U.S. regulatory matters, including government investigation and civil litigation.
- Advised financial institutions with respect to AML policies, procedures, and controls. Conducted AML compliance audits of third-party administrators.
- Successfully defended an investment adviser in connection with SEC insider trading investigation involving a global pharmaceutical company.
- Conducted an audit committee investigation into reserve accounting issues at a U.S.- listed, multi-national retailer.
- Obtained declinations from the DOJ and SEC on behalf of a U.S. telecommunications company in connection with parallel criminal and civil investigations into allegations of FCPA violations.
- Advised multibillion-dollar hedge fund and private equity fund clients with respect to anti-corruption due diligence and compliance issues related to investments in and monitoring of portfolio companies in Brazil, Russia, India, and China.
- Defended a former chief executive officer of a Fortune 25 company in an SEC accounting investigation.
- Defended foreign institutions in connection with parallel enforcement, tax and money laundering investigations by the SDNY U.S. Attorney's Office, SEC, and Permanent Subcommittee on Investigations of the U.S. Senate.

## **RANKINGS AND RECOGNITION**

- *Chambers USA*: FCPA (Nationwide), 2021

- *The Best Lawyers in America*<sup>®</sup>: Criminal Defense: White Collar, 2021 - 2022
- *Legal 500*: Dispute Resolution: Corporate Investigations and White-Collar Criminal Defense, 2013 - 2016, 2018 - 2021
- *Legal 500 Latin America*: International Firms: Compliance and Investigations, 2022
- Legal Media Group's *Expert Guides*: White Collar, 2020
- *Benchmark Litigation*: National Star for White Collar Crime and Securities Litigation, 2017 - 2018, 2022
- DC Bar Capital Pro Bono Honor Roll, 2020
- DC Bar Capital Pro Bono High Honor Roll, 2015

## **AFFILIATIONS**

- Member, American Bar Association Anti-Money Laundering Committee
- Member, American Bar Association International Anti-Corruption Committee
- Certified Anti-Money Laundering Specialist, Association of Certified Anti-Money Laundering Specialists
- Board Member, Washington Lawyers Committee for Civil Rights and Urban Affairs
- Former Chairman, Olney Boys & Girls Club

## **ADMISSIONS**

### **Bar Admissions**

- District of Columbia
- Massachusetts

### **Court Admissions**

- United States District Court for the District of Columbia
- United States District Court for the District of Massachusetts
- District of Columbia Court of Appeals

## **CLERKSHIPS**

- Clerk, The Honorable Truman A. Morrison III, District of Columbia Superior Court, 1995 - 1996