Michael T. Dyson

Partner

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Mike focuses his practice on securities litigation, enforcement, arbitration, regulation and compliance. He has extensive experience representing broker-dealers, other financial institutions, public and private companies, officers and directors in enforcement investigations and examinations before the US Securities and Exchange Commission (SEC), the US Department of Justice (DOJ), the Financial Industry Regulatory Authority (FINRA) and other federal and state agencies. Mike also advises clients on regulatory and compliance matters, including developing effective policies and procedures for broker-dealers and chief compliance officers.

Mike has also served as senior counsel to FINRA. In that role he was responsible for reviewing regulatory and compliance referrals by the Market Regulation and Enforcement staff against broker-dealers and/or brokers involving violations of ethical rules and federal securities laws; rules and regulations identified in the course of FINRA cycle examinations, audits, industry sweeps and customer complaints; termination notices and investigations by the Office of Fraud Detection and Market Intelligence; tips to the Office of the Whistleblower; special investigations; and making a determination, based on an analysis of the sufficiency of evidence and applicable law, whether FINRA should pursue formal disposition of the recommended charges.

Mike also represented FINRA in disciplinary hearings, expedited proceedings and settlement negotiations as well as served as lead counsel in special investigations of potential misconduct in violation of FINRA, NASD, NYSE, Nasdaq and MSRB rules; the Securities Act of 1933; the Securities Exchange Act of 1934; the Investment Advisers Act of 1940; and other federal securities laws, rules and regulations.

Mike was previously a partner at another Washington, DC law firm, where he successfully litigated all aspects of cases from commencement through appeal. He has particular experience representing financial services clients in various civil and criminal matters, with a concentration on complex civil cases, white-collar criminal litigation, and securities enforcement and regulation matters.

Education

- Georgetown University Law Center (J.D.)
- James Madison University (B.A.)

Capabilities

- Complex Commercial & Financial Disputes
- Government Investigations & White Collar Defense
- Environmental, Social and Governance (ESG)
- Financial Services
- Litigation
- Professional Liability Defense
- Regulatory Compliance
- Securities Litigation
- Small-Firm Task Force
- Shareholder Activism, Hostile Transaction and Proxy Defense

Sullivan
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Bar & Court Admissions

- District of Columbia
- Maryland
- Virginia
- U.S. Court of Appeals for the District of Columbia Circuit
- United States Court of Appeals for the Federal Circuit
- United States Court of Appeals for the Fourth Circuit
- United States District Court for the District of Columbia
- United States District Court for the Eastern District of Virginia

Professional Qualifications

- Security Industry and Financial Markets Association (SIFMA), Compliance and Legal Society

Awards & Honors

- Thomson Reuters "Stand-Out Lawyer" (2025)

Matters

- Defended an international power company in a grand jury investigation led by the DOJ into potential violations of the Foreign Corrupt Practices Act. Conducted internal investigation at client sites in the United States.
- Defended an international power company in a construction arbitration. After a two-week hearing, a three-judge AAA Panel awarded the power company approximately $4.5 million in damages based on various counterclaims. The Virginia Supreme Court affirmed the arbitration award.
- Defended an airline executive who avoided criminal charges in a DOJ antitrust investigation involving price-fixing in the air cargo industry.
- Defended a broker-dealer officer who avoided civil and potential criminal charges in an SEC investigation involving market timing and other financial irregularities in the securities industry.
- Defended two brokers who avoided civil and potential criminal charges in an SEC investigation involving insider trading and other allegations of fraud and manipulation involving open and closed-end funds.
- Defended a broker-dealer and the broker-in-charge in a securities arbitration. After a two-week arbitration hearing, a three-judge NASD Arbitration Panel dismissed all claims with prejudice against the broker-dealer and the broker-in-charge. Claimants, beneficiaries of three separate trusts, filed suit alleging breach of contract, negligence, failure to supervise, suitability, breach of fiduciary duty, and misrepresentations and omissions. Claimants sought $6 million in actual damages and an unspecified amount of punitive damages. The NASD Panel awarded Claimants no damages.
- Defended a broker-dealer in a FINRA arbitration filed by claimants who alleged claims of failure to supervise and respondeat superior based upon an independent broker's involvement in real estate transactions.
- Defended a broker in a FINRA Enforcement investigation involving the

negotiation and sale of residential mortgage backed securities to institutional investors.

- Assisted company with an internal investigation involving allegations of embezzlement and potential consequences for employee involved in fraudulent conduct.
- Represented a public company in responding to a FINRA Enforcement inquiry involving potential insider trading activity.
- Defended a broker-dealer in a FINRA Enforcement investigation regarding mutual fund share class suitability.
- Defended a broker in a FINRA Enforcement investigation involving allegations that the broker failed to disclose tax liens in accordance with FINRA rules.
- Defended a broker-dealer in a FINRA Enforcement investigation regarding anti-money laundering policies and procedures.