



## *Ashley E. Bashur*

**PARTNER**

---

WASHINGTON DC  
+ 1 202 663 6433  
ASHLEY.BASHUR@WILMERHALE.COM

Ashley Bashur represents clients in complex enforcement and regulatory matters and internal investigations concerning the federal and state securities and commodities laws. Ms. Bashur has extensive experience representing corporations, financial institutions, and individuals in investigations and proceedings before the Securities and Exchange Commission (SEC), the Financial Industry Regulatory Authority (FINRA), the Commodity Futures Trading Commission (CFTC), the New York Attorney General's Office, the New York Stock Exchange (NYSE), Nasdaq Market Regulation, the Cboe Regulatory Division, the Public Company Accounting Oversight Board (PCAOB), the Consumer Financial Protection Bureau (CFPB), and other agencies and self-regulatory organizations. Ms. Bashur has represented clients in a variety of matters, including matters involving high-frequency and algorithmic trading, market manipulation, anti-money laundering, trade reporting, suitability, complex products, auditor independence, insider trading, books and records, and whistleblower protection.

Ms. Bashur also has represented clients in civil litigation and criminal appeals, and she has argued before the Court of Appeals of Maryland and the Court of Special Appeals of Maryland. She maintains an active pro bono practice, focusing her efforts on the representation of indigent criminal defendants and veterans and volunteering at the DC Landlord Tenant Resource Center and Election Protection.

---

## *Solutions*

Futures and Derivatives  
Securities Enforcement

Investigations  
Securities Litigation

Litigation

---

## *Experience*

- Represent broker-dealers, investment advisers, and swap dealer in off-channel communications sweep.
- Represented broker-dealer in FINRA enforcement action pertaining to trade reporting to the Consolidated Audit Trail.
- Counsel to broker-dealer in enforcement action alleging violations of close-out requirements pertaining to interdealer fails in municipal securities and related supervisory failures.
- Counsel to a municipal underwriter in SEC enforcement action pertaining to MSRB and SEC disclosure rules.
- Successfully negotiated settlement on behalf of broker-dealer in NYSE enforcement action pertaining to the firm's supervision of floor broker activities.
- Counsel to several broker-dealer firms in FINRA, SEC, and Exchange investigations into compliance with the Market Access Rule.
- Represented broker-dealer in Cboe and FINRA investigations into potential market manipulation by high-frequency trading client.
- Counsel to multinational Fortune 500 company and company CEO in SEC investigation relating to potential Sarbanes-Oxley Act and FCPA violations.
- Defended an energy-sector corporation in numerous securities class actions and shareholder derivative actions.
- Represented senior executives of broker-dealers in SEC investigation into the Market Access Rule.
- Counsel to broker-dealer firm in FINRA enforcement action pertaining to supervision of lines of credit subject to bank regulations.
- Conducted internal investigations of public issuers, financial institutions, and other companies pertaining to potential fraud or insider trading.

### *Pro Bono Work*

- Represent veterans seeking Combat-Related Special Compensation and upgrades to discharge.
- Represented indigent criminal defendant in appeal to Court of Special Appeals of Maryland.
- Represented the Public Defender of Maryland in appeal to Court of Appeals of Maryland involving the right to counsel at bail hearings.
- Served as volunteer at the Landlord Tenant Resource Center in Washington DC and for the Election Protection Hotline in North Carolina.

---

## Credentials

### EDUCATION

Harvard Business School Online

*Credential of Readiness (CRe),  
Business Analytics, Financial  
Accounting, Economics for  
Managers, with Honors, 2015*

JD, University of Baltimore  
School of Law, 2009

*summa cum laude*

*Valedictorian; Staff Member,  
University of Baltimore Law  
Review; Heusler Honor Society*

BA, Political Science, Dickinson  
College, 2006

*magna cum laude*

### ADMISSIONS

District of Columbia

Maryland