

ONNIG H. DOMBALAGIAN

Tulane University School of Law



ACADEMIC EMPLOYMENT

Tulane University School of Law, 2003–present

<i>Rank</i>	John B. Breaux Chair in Law and Business George Denègre Endowed Professorship in Law
<i>Courses</i>	Business Enterprises Corporate Finance Securities Regulation Mergers & Acquisitions Law, Finance & Technology Seminar Capital Markets Seminar Contract Drafting Business Literacy for Lawyers
<i>Decanal Service</i>	Vice Dean for Academic Affairs, 2016–2020
<i>University Committee Service</i>	Conflict of Interest Committee (Chair, 2022–present) Institutional Conflict of Interest Committee Task Force on Artificial Intelligence in Research SACSCOC Compliance Certification Committee Technology Committee Five-Year Review of David Meyer—Dean, Law School (elected) Committee for Academic Freedom & Responsibility of Students Budget Review Committee
<i>Law School Committee Service</i>	ABA Site Visit/Assessments (Chair, 2026) Academic Affairs (Chair, 2011, 2014 and 2024) Appointments Clinical Retention & Promotion (Chair, 2022) Executive (elected 2010 and 2014) Experiential Learning Faculty Handbook (Chair, 2021) Intellectual Life JD/MBA Task Force (Co-Chair, 2016) Promotion and Tenure (Chair, 2016) Strategic Planning
<i>Awards</i>	Felix Frankfurter Distinguished Teaching Award, 2007
<i>Other Service</i>	Co-Founder and Co-Director (2017), Intersession—Business Literacy for Lawyers Co-Founder and Co-Director (2012–2015), Intersession—Transactional Practice

American University of Armenia, Yerevan, Armenia, Fall 2000 (visiting professor)

SCHOLARSHIP

Book

Chasing the Tape: Information Law and Policy in Capital Markets
Cambridge, Mass.: MIT Press, 2015

Book Chapters

“Best Execution: An Impossible Dream?” in *The Cambridge Handbook of Investor Protection*
(Arthur B. Laby, ed., Cambridge University Press 2022)

“Securities and Derivatives Exchanges in the United States,” in *Financial Market Infrastructures: Law and Regulation* (Jens-Hinrich Binder & Paolo Saguato eds., EU Financial Regulation Series, Oxford University Press 2021)

“Transnational Capital Market Regulation and the Role of the Stock Exchange”
in *Beyond Territoriality: Transnational Legal Authority in an Age of Globalization*
(Günther Handl & Joachim Zekoll eds., Leiden: Brill/Martinus Nijhoff 2012)

Journals

Let’s NMS with Texas: The Implications of the Texas Stock Exchange for Self-Regulation
5 U. Chi. Bus. L. Rev. (2026 forthcoming)

Serendipity and Self-Regulation: The Evolution of Cryptocurrency-Based ETPs
15 Am. U. Bus. L. Rev. (2025 forthcoming)

Class Certification of Exchange-Listed Options in Securities Class-Action Litigation
27 U. Penn. Bus. L.J. 71 (Spring 2025)

Bond Trading at the Digital Frontier
49 J. Corp. L. 489 (2024)

Are Cryptoexchanges the Exchange Act’s Trojan Horse?
21 Berkeley Bus. L.J. 327 (2024)

Texas Gulf Sulphur and Information Disclosure Policy
71 SMU L. Rev. 713 (2018)

Preserving Human Agency in Automated Compliance
11 Brooklyn J. Corp. Fin. & Com. L. 71 (2016)

Substance and Semblance in Investor Protection
40 J. Corp. L. 599 (2015)

Principles for Publicness
67 Fla. L. Rev. 649 (2015) (reprinted in the *Securities Law Review*)

The Volcker Rule and Regulatory Complementarity
10 Oxford Capital Markets L.J. 469 (2015)

Exchanges, Listless?: The Disintermediation of the Listing Function
50 Wake Forest L. Rev. 579 (2015)

The Expressive Synergies of the Volcker Rule
54 B.C. L. Rev. 469 (2013)

Proprietary Trading: Of Scourges, Scapegoats, and Scofflaws
81 U. Cin. L. Rev. 387 (2012)

Regulating Informational Intermediation
1 Am. U. Bus. L. Rev. 59 (2011)

Investment Recommendations and the Essence of Duty
60 Am. U. L. Rev. 1265 (2011) (reprinted in the *Securities Law Review*)

Requiem for the Bulge Bracket?: Revisiting Investment Bank Regulation,
85 Ind. L.J. 777 (2010)

Can Borrowing Shares Vindicate Shareholder Primacy?
42 U.C. Davis L. Rev. 1231 (2009)

Choice of Law and Capital Markets Regulation
82 Tul. L. Rev. 1903 (2008)

Licensing the Word on the Street: The SEC's Role in Regulating Information
55 Buff. L. Rev. 1 (2007)

Self and Self-Regulation: Resolving the SRO Identity Crisis
1 Brooklyn J. Corp. Fin. & Com. L. 317 (2007)

Demythologizing the Stock Exchange: Reconciling Self-Regulation and the National Market System
39 U. Rich. L. Rev. 1069 (2005) (reprinted in the *Securities Law Review*)

Invited Blog Posts

“Serendipity and Self-Regulation: The Case of Cryptocurrency ETPs”
Columbia Law School Blue Sky Blog, October 10, 2024

“Class Certification of Exchange-Listed Options in Securities Class-Action Litigation”
Columbia Law School Blue Sky Blog, April 4, 2024

“Are Cryptoexchanges the Exchange Act’s Trojan Horse?”
Columbia Law School Blue Sky Blog, March 6, 2024

“Compliance Personnel: The ‘Architects and Engineers’ of Automated Compliance Systems”
Compliance & Enforcement Blog, New York University School of Law, October 12, 2016

“Thoughts on the Evolution of Exchanges”
Columbia Law School Blue Sky Blog, July 23, 2015

Other

Regulating Information Flows in Capital Markets
68 SMU L. Rev. 727 (2015) (contribution to tribute issue to Alan Bromberg)

Testimony before the U.S. Senate Committee on Banking, Housing, and Urban Affairs at a field hearing entitled “Alleged Stanford Financial Group Fraud: Regulatory and Oversight Concerns and the Need for Reform,” Baton Rouge, Louisiana, August 17, 2009

PROFESSIONAL EXPERIENCE

Attorney Fellow (GS-15/SK-16), U.S. Securities & Exchange Commission, Washington, DC, 2001–2003

Drafted joint margin regulations for security futures with CFTC staff. Participated in rulemaking and policy initiatives relating to security futures, the national market system, regulation of retail swaps, and exchange-traded options. Eponym of certain 2013 amendments to the net capital rule.

Associate, Cleary, Gottlieb, Steen & Hamilton, Washington, DC, 1996–2001

Advised clients and prepared amicus briefs, comment letters and requests for no-action relief on matters of financial responsibility and business conduct relating to investment banks and broker-dealers, exchanges and alternative trading systems, and cross-border transactions.

Law Clerk, Hon. J. Edward Lumbard, U.S. Court of Appeals for the Second Circuit, 1995–1996

PROFESSIONAL ACTIVITIES

National Adjudicatory Council, Financial Industry Regulatory Authority, 2013–2015, 2022–2025

Completed a three-year term (2013–2015) and a second four-year term (2022–2025) as non-industry member on council that hears appeals from FINRA disciplinary and membership proceedings involving broker-dealers and their associated persons.

Corporations Committee, Louisiana State Law Institute, 2009–present

Member of committee charged by the Louisiana legislature to study and make recommendations on the revision of Louisiana business association laws (Act No. 328, §§ 1, 7, 2014 La. Acts).

FINRA Dispute Resolution, 2005–present

Public arbitrator in customer and industry arbitrations involving broker-dealers.

FI Consulting, Arlington, Virginia, Summer 2025

Consultant on project relating to stablecoins.

Cleary Gottlieb Steen & Hamilton LLP, New York, New York, Summer 2011

Coordinated revisions to the firm's treatise, *U.S. Regulation of International Securities and Derivatives Markets* (10th ed.), relating to bank securities activities and derivatives regulation following the passage of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

U.S. Securities & Exchange Commission, Washington, DC, Summer 2005

Assisted the Division of Market Regulation with projects relating to the reporting of execution quality on options exchanges and the allocation of jurisdiction over exchange-traded funds.

SELECTED CONFERENCES AND PRESENTATIONS

Presenter, *Let's NMS with Texas*, at the AALS Financial Regulation Midyear Conference, Ross School of Business, University of Michigan, Aug. 8, 2025.

Presenter, *Serendipity and Self-Regulation: The Case of Cryptocurrency ETPs*, at the AALS Financial Regulation Midyear Conference, The Wharton School, University of Pennsylvania, Nov. 1, 2024.

Presenter, *The Evolving Regulation of Bond Markets*, at the Tulane Corporate and Securities Law Roundtable, Tulane Law School, March 9, 2024.

Presenter, *Cryptoexchanges: The Exchange Act's Trojan Horse*, at the AALS Financial Regulation Midyear Conference, The Wharton School, University of Pennsylvania, Sept. 28, 2023.

Presenter, *Cryptoexchanges: The Exchange Act's Trojan Horse*, at the Murphy Institute's Center for Law and the Economy Legal Scholarship Workshop, Tulane Law School, Sept. 21, 2023.

Presenter, *Bonds at the Digital Frontier*, Finance Seminar Series, A.B. Freeman School of Business, Tulane University, Oct. 28, 2022.

Presenter, *Bonds at the Digital Frontier*, at the Annual Meetings of the Canadian Law and Economics Association, University of Toronto, Oct. 20–21, 2022.

Contributor, *Best Execution: An Impossible Dream?*, for the Investor Protection Project, sponsored by Rutgers Law School, Winter 2021.

Presenter, *Stock and Derivatives Exchanges: Market and Ownership Structures and Regulatory Framework—The U.S. Perspective*, at a conference entitled “The Law and Regulation of Financial Market Infrastructure: A Trans-Atlantic Perspective on Securities and Derivatives Markets,” sponsored by Eberhard Karls University Tübingen in cooperation with George Mason and The European Banking Institute, Tübingen, Germany, Jan. 30–31, 2020.

Senior Participant, Southeastern Junior/Senior Faculty Workshop, Tulane Law School, Nov. 1–2, 2019 (commenting on George Georgiev, *Human Capital Management and Corporate Governance* and Andrew Winden, *Jumpstarting Sustainability Disclosure*).

Commenter, AALS Offsite Financial Regulation Workshop, New Orleans, Jan. 4, 2019 (on Gina-Gail Fletcher, *Algorithmic Manipulation*).

Commenter, Roundtable co-sponsored by Tulane Law School and the Murphy Institute entitled “The New Normal: Financial Regulation, Monetary Reform & Community Development,” Tulane Law School, May 25–26, 2018 (on Rebecca Lewis, *Corporate Governance in CCPs*).

Presenter, *Preserving Human Agency in Automated Surveillance*, at a symposium entitled “The Role of Technology in Compliance in Financial Services: An Indispensable Tool as well as Threat?” at Brooklyn Law School, March 4, 2016.

Moderator, Panel on “The Securities Law Perspective,” at the Tulane Law Review Symposium on “The Promise and Perils of Convergence in Financial Regulation and Consumer Protection,” Tulane Law School, Nov. 13, 2015.

Presenter, *Exchanges, Listless?: The Future of Listing*, at the Wake Forest Law Review 2015 Spring Symposium on “The Future of Financial Intermediation,” Wake Forest University School of Law, March 27, 2015.

Commenter and Co-Host, International Financial Regulation Roundtable, Tulane Law School, March 28–29, 2014 (on Yesha Yadav, *Beyond Efficiency in Securities Regulation*, and Stavros Gadinis, *Global Technocrats*).

Panelist, “Regulating Financial Intermediaries,” at the Financial Institutions and Consumer Financial Services and Securities Regulation Joint Program, 2013 AALS Annual Meeting, New Orleans, Louisiana, Jan. 4, 2013.

- Presenter, *Expressive Synergies of the Volcker Rule*, at the Scholars Roundtable on Post-Crisis Implementation of Regulatory Reforms, Brooklyn Law School, Nov. 9, 2012.
- Presenter, *Expressive Synergies of the Volcker Rule*, at the Annual Meetings of the Canadian Law and Economics Association, University of Toronto, Sept. 29, 2012.
- Presenter, *Proprietary Trading: Scourge, Scapegoat . . . and Scofflaw?*, at the 25th Annual Corporate Law Center Symposium on “Implementing the Dodd-Frank Wall Street Reform and Consumer Protection Act,” University of Cincinnati College of Law, March 30, 2012.
- Commenter, International Financial Regulation Conference, The Wharton School, University of Pennsylvania, July 20–21, 2011 (on Anna Gelper, *Banks and Governments, Happily Ever After*).
- Presenter, *Regulating Information Quality*, at the American University Business Law Review Symposium on “Law, Finance and Legitimacy After Financial Reform,” Washington College of Law, American University, April 8, 2011.
- Guest Lecturer, *Swaps from a Lawyer’s Perspective*, at the U.S. Securities & Exchange Commission, Washington, D.C., Aug. 6, 2010.
- Commenter, Conference on International Financial and Monetary Law, The Heyman Center, Benjamin N. Cardozo School of Law, June 3–4, 2010 (on Emiliios Avgouleas et al., *Living Wills as a Catalyst for Action*).
- Presenter, *A Virtuous Cycle?: Legal and Regulatory Responses to the Resurgence of the Shareholder Franchise*, at the Leet Symposium on “Institutional Investors in Corporate Governance: Heroes or Villains?”, Case Western Reserve Law School, April 17, 2009.
- Presenter, *Extraterritoriality and Capital Markets Regulation*, at the Extraterritoriality Project Work-in-Progress Conference organized by Tulane Law School and Johann Wolfgang Goethe University, Frankfurt, Germany, Dec. 18, 2008.
- Presenter, *Too Interconnected to Fail?: Rethinking Investment Bank Regulation*, at the Annual Meetings of the Canadian Law and Economics Association, University of Toronto, Sept. 27, 2008.
- Presenter, *Choice of Law and Capital Markets Regulation*, at the Center for International and Comparative Law Symposium on “The European Choice-of-Law Revolution—A Chance for the United States?”, Duke University School of Law, Feb. 9, 2008.
- Presenter, *Share Lending and Shareholder Primacy*, at the Annual Meetings of the Canadian Law and Economics Association, University of Toronto, Sept. 28, 2007.
- Presenter, *Self and Self-Regulation: Resolving the SRO Identity Crisis*, at the SEC Historical Society Symposium on “Securities Market Structure and Regulation: What Does the Future Hold?”, Brooklyn Law School, Nov. 10, 2006.
- Guest Lecturer, *What is an Exchange?*, at the Samuel and Ronnie Heyman Scholars Program in Corporate Governance, Benjamin N. Cardozo Law School, Nov. 8, 2006.

EDUCATION

Harvard Law School, J.D. cum laude, 1995

Harvard Law Review, 1993–1995 (Publishing Editor, 1994–1995)
International Law Journal, 1992–1993

Harvard College, A.B. in computer science, summa cum laude, 1992

Detur Prize. John Harvard Scholarship. Phi Beta Kappa.

BAR MEMBERSHIPS

New York (1996)
District of Columbia (1996)
Maryland (1996, inactive)

LANGUAGES

English (native)
Armenian (native)
French (working proficiency—DALF C1)