



Kit Addleman

Partner

Dallas

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PRACTICES SEC Enforcement, Internal Investigations, Corporate Governance, Investment Management, Regulatory Compliance, Government Enforcement and Litigation, Foreign Corrupt Practices Act (FCPA), Corporate, Litigation, FinTech Virtual Currency and Blockchain, Crisis Management

Known as a “powerhouse lawyer” in securities enforcement defense, Kit Addleman has built her nationwide practice by advising public companies, officers and directors, investment advisors, private funds and broker-dealers concerning securities investigations. She has successfully defended clients in civil and criminal investigations and litigation by the Securities and Exchange Commission and Department of Justice, advised clients on compliance with securities regulations and conducted internal investigations of suspected securities violations. Kit’s experience serving in four different regional offices over her 20 years in senior management at the SEC allows her to deftly advise clients at Haynes Boone, where she serves as chair of the firm’s SEC Enforcement Practice Group and is a prominent member of the Government Enforcement and Investment Management Practice Groups.

Many of Kit’s biggest successes have involved defending allegations of accounting and financial fraud, insider trading, private funds and investment advisor fraud, and Foreign Corrupt Practices Act violations. Clients note that Kit is “rare in her securities specialty and one of the top enforcement lawyers in that area,” that her “SEC experience is incredibly valuable,” and “bringing her in gives us an edge on very complex regulatory issues and the practical business implications,” *Chambers USA* 2020 (Chambers and Partners). Every year since 2016, Kit has been the only lawyer in Texas ranked for Securities: Regulation: Enforcement (Nationwide) by *Chambers USA*.

As director of the Atlanta Regional Office of the SEC, Kit led the enforcement, examination, and bankruptcy programs in five Southeastern states, which included directing the enforcement priorities and resolutions of investigations and litigation. She served the SEC in the Atlanta, Fort Worth, Denver, and Philadelphia offices and headed the enforcement program in the SEC’s Fort Worth and Atlanta offices before being named the regional director in Atlanta in 2007. A sought-after authority for her knowledge of the SEC’s enforcement and examination programs, Kit frequently speaks at national, international, and regional conferences. She has authored and contributed to numerous articles, white papers, and alerts on the subject.

Kit serves her colleagues and community with the same zeal she offers her clients. She started the firm’s Women’s Initiative and served six years as the head of the Women’s Leadership Academy, a training program for senior associates. Kit also serves as chair of the board with the Girl Scouts of Northeast Texas. In 2016, the *Dallas Business Journal* profiled Kit about her efforts at the Girl Scouts to develop a STEM training program. The National Association of Corporate Directors also named her an

“Outstanding Director” for her work on behalf of the Girl Scouts. And in 2021, Kit was recognized as a “Women of Distinction” by the Girl Scouts of Northeast Texas, which celebrates women leaders who serve the community.

She is co-chair of the ABA subsection on Officer and Director liability defense. Additionally, she co-founded the local chapter of the Women’s White Collar Defense Association to facilitate business growth and networking for women lawyers defending government actions and investigations. Kit also is a past board member of the National Society of Compliance Professionals and the Consumer Credit Counseling Service, both organizations which support financial literacy and money management, investor protection and securities compliance.

QUALIFICATIONS

EDUCATION

- J.D., Oklahoma City University School of Law, 1986, *with distinction*
- B.A., American and Comparative Politics, Wake Forest University, 1983

ADMISSIONS

- Texas
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PUBLICATIONS AND SPEAKING ENGAGEMENTS

- "[New SEC Dealer Rule Leaves Crypto Pros Feeling In The Dark](#)," quoted, *Law360*, February 9, 2024.
- "[Guidance on 2024 SEC Examination Priorities](#)," co-author, Practical Guidance, *Lexis Nexis*, January 30, 2024.
- "[Marketing Rule Among 2024 Enforcement Priorities: SEC Roundup](#)," panelist, Think Advisor, *ALM Global, LLC*, November 30, 2023.
- "[Legal Expert on What Binance, CZ Woes Mean For Crypto Industry](#)," interviewee, *CoinDesk*, November 22, 2023.
- "Understanding SEC’s Aggressive Shift on Disclosure Controls," co-author, *Law360*, April 10, 2023.
- "A Look at the SEC’s Last Decade of Cybersecurity Enforcement Efforts, Part II: Focus on Registered Entities," American Bar Association, February 15, 2022.
- "A Look at the SEC’s Last Decade of Cybersecurity Enforcement Efforts, Part I: Focus on Public Companies," American Bar Association, January 7, 2022.
- "Updates on SEC Enforcement Priorities for Corporate Directors," co-presenter, NACD North Texas Chapter Expert Series, December 1, 2021.
- “SEC Enforcement Update,” speaker, Coffee, Tea and the SEC: Trends and Updates webinar, November 17, 2021.
- “A Look at Changing Securities Enforcement Priorities,” SMU Corporate Counsel Symposium, October 22, 2021.
- “Risky Business: Not Just an 80’s Cult Classic - Identifying, Assessing, and Managing Your Business Risks,” co-presenter, Collin County Bar Association, Corporate Counsel Section Meeting, July 8, 2021.
- "The Impact of a Biden Administration on Texas Businesses," presenter, *The Texas Lawbook* webinar, March 2, 2021.
- “Risky Business: Not Just an 80’s Cult Classic—Identifying, Assessing and Managing Your Business Risks,” co-presenter, 2020 SMU Corporate Counsel Symposium, October 15, 2020.

- “SEC Enforcement Update,” speaker, Coffee, Tea and the SEC: Trends and Updates Breakfast, November 19, 2019.
 - “The Company in Crisis: Talking to Investors, Regulators and the Media,” moderator, UT Law CLE’s 6th Annual Government Enforcement Institute, Houston, September 12, 2019.
 - “Cybersecurity Disclosures: Guidance for Public Companies,” speaker, Haynes and Boone, LLP webinar, May 20, 2019.
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PROFESSIONAL AFFILIATIONS AND ENGAGEMENTS

- Board of Advisors, SEC Historical Society
 - Board of Directors and Alumnae Association chair person, Girl Scouts of Northeast Texas
 - Board of Directors, Consumer Credit Counseling Service
 - Board of Directors and member, National Society of Compliance Professionals
 - Founding Member, DFW Chapter of Women in White Collar Defense
 - Member, The Board Connection
 - Member, Texas Wall Street Women
 - Member, National Association of Women Lawyers
 - Member, Securities Industry and Financial Markets Association (SIFMA) Compliance and Legal Society
 - Co-chair of the Women’s Leadership Academy at Haynes and Boone
 - Member, Haynes and Boone Diversity Committee
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SELECTED CLIENT REPRESENTATIONS

Defense of Enforcement Investigations

- Conducted internal investigation and defended corresponding SEC investigation of accounting treatment for non-recurring revenue transactions, disclosures, and financial statements of Fortune 200 company.
- Defended publicly-traded natural gas and oil company in SEC investigation of reserve accounting and related public disclosures; Received termination letter indicating no action would be recommended by SEC staff.
- In multiple investigations of potential insider trading closed without enforcement action, represented investment funds, public company, and individual traders.
- Defended audit committee of public company board in SEC investigation of accounting misstatements.
- Represented alternative energy company in connection with an SEC investigation of disclosures made by the company's Chinese parent.
- Defended broker-dealer in SEC investigation of offering disclosures related to real estate tenant-in-common programs; Investigation closed without action.
- Represented former public company and its private investor in SEC investigation of potential violations of the FCPA by a Chinese subsidiary; Received termination letter from the SEC staff.
- Defended officers of a broker-dealer in an SEC investigation of alleged short-selling and stock lending violations.
- Represented SEC registered investment adviser in SEC investigation of securities trading strategies involving allegations of possible front-running or insider trading; Received termination letter from the SEC staff.
- Defended publicly traded REIT in connection with SEC investigation of valuation and disclosures.

- Represented broker-dealer and investment fund in SEC investigation of disclosures and related party transactions in real estate fund offering.
- Represented successfully portfolio manager in SEC investigation of valuation and disclosures by money market fund.
- Defended successfully sales representative in SEC investigation of oil and gas offering.
- Represented alternative energy company in SEC investigation of limited partnership offerings; Received termination letter from the SEC staff.
- Represented public companies in internal investigations relating to requests by FINRA focused on trading by potential insiders or tippees prior to merger and acquisition announcements.
- Represented investment adviser firm and associated individuals in FINRA investigation of securities trading.
- Represented securities attorney in SEC investigation of unregistered securities offering and, after Wells notice had been given, persuaded SEC staff to drop the recommendation of charges.
- Defended investment adviser in connection with cease-and-desist order from a state securities commission and obtained withdrawal of the order by the commission.
- Represented investment advisory firms in enforcement investigations by the Texas State Securities Board.
- Conducted various internal investigations related to potential securities law violations at public companies.

Regulated Entity Compliance and Examinations

- Advised investment advisory firms and investment funds on SEC compliance issues; Revised compliance manuals, reviewed advisory agreements, investment management agreements, and third-party contracts; Addressed procedures and books and records requirements including those applicable to the custody rules, pay-to-play restrictions, and other recent SEC actions.
- Counseled investment advisers and funds in preparation for compliance inspections and examinations.
- Represented broker-dealers, investment advisers and investment funds in addressing SEC deficiency letters and concerns.
- Counseled dually registered broker-dealer and investment adviser relating to changes in brokerage platform and advisory business; Represented firm in obtaining FINRA's approval of changes.
- Provided annual and ad hoc training to investment advisers and funds.
- Represented investment advisers, investment funds, and broker-dealers in various enforcement investigations (see above).

Public Company Counseling and Compliance

- Provided training and compliance guidance to Fortune 500 company including board of directors, senior management, and financial reporting teams surrounding the SEC's disclosure requirements related to financial reporting and management's discussion and analysis.
- Drafted and updated insider trading policies for public companies, including Fortune 500 and NYSE-listed companies, as well as investment funds and investment advisers; Provided advice to public companies, investment advisers, funds and individuals regarding trading decisions and compliance with insider trading restrictions.
- Advised public companies in comment letter process from SEC's Division of Corporation Finance regarding responses and revisions to filings required by SEC staff.
- Counseled public companies, including NYSE-listed and Fortune 1000 companies, regarding Regulation FD compliance including corrective disclosures and compliance procedures.
- Drafted FCPA policies for multiple companies and provided advice regarding ethics policies to prevent.

- Counseled publicly traded companies regarding disclosure obligations surrounding government investigations and litigation.
 - Advised public company regarding acquisition of an entity under investigation for potential FCPA violations.
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AWARDS AND RECOGNITIONS

- Recognized by *Chambers USA*, Chambers and Partners, as a "recommended practitioner" for Securities: Regulation: Enforcement (Nationwide), 2014-2017, 2019-2024; and Litigation: Securities (Texas), 2016-2017; and Litigation: White-Collar Crime and Government Investigations (Texas), 2018-2024. Kit was the only lawyer in Texas ranked for Securities: Regulation: Enforcement (Nationwide) in the 2016-2024 editions of *Chambers USA*.
- Recognized in *The Best Lawyers in America*, Woodward/White, Inc., Criminal Defense: White Collar, 2016-2025
- Listed among Securities Docket's Enforcement Elite, 2024
- Included in the *Lawdragon 500 Leading Litigators in America* guide, 2023-2025
- Recognized by *D Magazine*, D Magazine Partners, "Best Lawyers in Dallas" in Securities Litigation and Enforcement, 2015-2025; White Collar Defense, 2013-2014
- Recognized as a *Texas Super Lawyer*, Thomson Reuters, in Criminal Defense: White Collar, 2014-2024
- Included in *Texas Super Lawyers Women's Edition*, Thomson Reuters, as a Super Lawyer, 2023 - 2024
- Honored by Girl Scouts of Northeast Texas (GSNETX), as a Woman of Distinction, 2021.
- Recognized as an "Outstanding Director" by the *Dallas Business Journal*, American City Business Journals, for her efforts with the Girl Scouts, 2016
- Honored by Dallas Women Lawyers Association, as an Outstanding Partner in the Large Firm category, 2016