



Christian B. Hennion

Partner

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Practices

FOCUS: Financial Services

Futures and Derivatives

Financial Services Regulatory and Compliance

Proprietary Trading Firms

Private Funds and Investment Management

Independent Sponsors

Private Equity Regulatory Compliance

Quantitative and Algorithmic Trading

Industries

Private Client Services

Finance and Financial Services

Recognition

Super Lawyers Rising Stars, Illinois, 2016–2019

Christian B. Hennion concentrates his practice in financial services and asset management matters, including counseling fund managers, registered investment advisers, and commodity trading advisors and private equity firms on both transactional and regulatory matters. Chris has advised a wide range of US and international managers, from start-ups to large institutions, regarding a variety of matters, including private fund launches and reorganizations, advisory engagements, Investment Advisers Act and Commodity Exchange Act compliance obligations, SEC and CFTC registrations, examinations and enforcement actions, cross-border management and solicitation arrangements, and other related corporate and transactional matters. He is experienced with the preparation and negotiation of offering and advisory documents on behalf of asset management firms, as well as with the SEC and CFTC regulatory requirements and filings applicable to such firms.

For clients with complex or unique institutional structures, Chris regularly consults on how to efficiently structure and manage US-regulated businesses, while minimizing disruption for affiliated businesses both domestically and internationally. He also has worked closely with both SEC- and CFTC-registered clients undergoing compliance examinations and responding to inquiries from regulators and self-regulatory organizations to seek efficient and favorable resolution of the process and to negotiate agreeable outcomes on any resulting areas of concern.

During law school, Chris served as an executive articles editor of the *Chicago-Kent Law Review* and as a judicial extern to the Honorable Samuel Der-Yeghiayan of the US District Court, Northern District of Illinois.

Advisories

- National Futures Association Proposes Overhaul of its Member Requirements for the Supervision of Branch Offices and Guaranteed Introducing Brokers (July 2, 2019)
- SEC Charges Broker-Dealer/Adviser With Inadequate Cybersecurity Procedures (October 11, 2018)
- SEC Proposes Conduct Standards for Investment Advisers (May 4, 2018)
- The EU PRIIPs Regulation for Fund Managers (December 1, 2017)
- Department of Labor Finalizes 18-Month Extension for Simplified Compliance With the BIC Exemption Under the ERISA Fiduciary Advice Rule (November 30, 2017)



Education

JD, Chicago-Kent
College of Law,
Illinois Institute of
Technology

BA, The University of
Oklahoma

Bar Admissions

Illinois

- Sign of Future Changes? DOL Proposes 18-Month Extension of Transition Period for Compliance With ERISA "Fiduciary Investment Advice" Rule (August 11, 2017)
- Compliance With the ERISA Fiduciary Advice Rule for Private Investment Fund Managers and Sponsors and Managed Account Advisers: Beginning June 9, 2017 (June 6, 2017)
- SEC Proposes Rule Requiring Investment Advisers To Adopt Business Continuity and Transition Plans (July 13, 2016)
- Victim of Fraud Sued for Fraud (November 24, 2015)
- CFTC Proposes Revisions to Pending Aggregation Rules (September 28, 2015)
- CFTC Proposes Revised Position Limit Rules (November 12, 2013)
- CFTC Proposes Revised Aggregation Rules (November 7, 2013)
- CFTC Proposes Substantial Amendments to Speculative Position Limits (February 22, 2011)
- CFTC Issues Advisory Regarding Offer and Sale of Foreign Security Futures Products to US Persons (June 16, 2010)
- CFTC Proposes Position Limits and Exemptions for Certain Energy Contracts (January 27, 2010)

Articles

- Co-author, A Review of the SEC Participating Affiliate No-Action Letters' Relief From Investment Advisers Act of 1940 Registration for Foreign Investment Advisers, *Journal of Investment Compliance* (December 26, 2017)

Books

- Co-author, *OTC Derivatives Regulation Under Dodd-Frank: A Guide to Registration, Reporting, Business Conduct, and Clearing*, Thomson Reuters, 2014 ed., CPO and CTA Registration and Regulation (2014)

Newsletters

- Author | *Corporate & Financial Weekly Digest* (Weekly)

Speaking Engagements & Presentations

- Presenter | The National Futures Association's Proposed Revised Requirements for the Supervision of Branch Offices and Guaranteed Introducing Brokers. Get Prepared! (June 20, 2019)
- Panelist | Regulatory and Cross-Border Issues for Proprietary Trading Firms | London, United Kingdom (February 4, 2016)
- Panelist | Emerging Trends in Securities and Futures Trading Regulation | Chicago, Illinois (December 3, 2015)



- Panelist | Emerging Trends in Securities and Futures Trading Regulation | New York, New York (November 11, 2015)
- Panelist | Futures 101: NFA Bylaw 1101 and Aiding and Abetting – What Do You Need to Know About Your Customer? | 36th Annual Law & Compliance Conference on the Regulation of Futures, Derivatives and OTC Products | Baltimore, Maryland (May 7–9, 2014)
- Panelist | Trading Issues | Investment Adviser Compliance Forum: Annual Form ADV Amendments and Related Regulatory Issues | New York, New York (February 20, 2014)
- Panelist | Portfolio Management Issues | Investment Adviser Compliance Forum: Annual Form ADV Amendments and Related Regulatory Issues | New York, New York (February 6, 2014)
- Presenter | General Solicitation and Advertising Under the JOBS Act: Practical Considerations for Private Funds | New York, New York (September 25, 2013)