

Christian B. Hennion

Partner

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Practices

FOCUS: Financial Markets and Funds
Futures and Derivatives
Independent Sponsors
Investment Management and Funds
Private Equity Regulatory Compliance
Proprietary Trading Firms
Quantitative and Algorithmic Trading

Industries

Finance and Financial Markets
Private Client Services

Education

JD, Chicago-Kent College of Law, Illinois
Institute of Technology
BA, The University of Oklahoma

Bar Admissions

Illinois

Christian Hennion advises US and international asset managers on a variety of transactional and regulatory matters. He helps them with private fund launches and reorganizations, compliance issues under the Investment Advisers Act and Commodity Exchange Act and numerous issues before the Securities and Exchange Commission (SEC) and Commodity Futures Trading Commission (CFTC).

The regulatory advice asset managers need

Fund managers, registered investment advisers, commodity trading advisors and private equity firms all draw on Chris' advice. He represents them in registrations with the SEC and CFTC. He also works closely with both SEC- and CFTC-registered clients undergoing compliance examinations and responding to inquiries from regulators and self-regulatory organizations. Negotiating with regulators over any areas of concern, he helps to reach efficient and favorable resolutions. He is also experienced in preparing offering and advisory documents for asset management firms, and knowledgeable about the SEC and CFTC regulations applicable to them.

For clients with complex institutional structures, Chris consults on how to efficiently structure US-regulated businesses while minimizing disruptions to affiliated domestic and international businesses.

Recognitions

Recognized or listed in the following:

- *Super Lawyers Rising Stars*
 - Illinois, 2016–2020

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- *The Legal 500 United States*
 - Recommended Attorney, 2020

News

- Katten Represents Copy-Trading Platform dub in Seed Funding Round (February 23, 2024)
- Katten Advises Areim AB in Complex Joint Venture Structure With VGP NV (January 5, 2024)
- Christian Hennion Looks At SEC Exam Priorities for *FundFire* (March 13, 2023)
- Coronavirus (COVID-19) Resource Center (November 10, 2021)
- Katten Named Top-Tier Firm in Structured Finance and Securitization by The Legal 500 United States 2020 Guide (June 16, 2020)
- Katten Attorneys Selected to 2020 Illinois Super Lawyers, Rising Stars Lists (January 29, 2020)
- Super Lawyers Lists Honor More Than 50 Katten Attorneys in Illinois (January 24, 2019)
- Katten Attorneys Recognized in 2018 Illinois Super Lawyers, Rising Stars Lists (January 25, 2018)
- Katten Attorneys Recognized in 2017 Illinois *Super Lawyers*, Rising Stars Lists (January 13, 2017)
- Katten Represents Gamut Capital Management in \$1 Billion Private Equity Fund (January 4, 2017)
- Katten Represents Gerchen Keller Capital in Acquisition by Burford Capital Limited (December 14, 2016)
- Forty-Seven Katten Attorneys Recognized in 2016 Illinois *Super Lawyers* List (January 8, 2016)

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- Katten Names Sixteen New Partners in Five Practice Areas (August 5, 2014)

Publications

- Foreign Listed Stock Index Futures and Options Approvals December 2023 (December 19, 2023)
- Financial Markets and Funds *Quick Take* | Issue 19 (October 2023)
- SEC Adopts Controversial and Sweeping Changes to Private Fund Rules; Requires Documentation of Annual Compliance Reviews (August 25, 2023)
- Financial Markets and Funds Quick Take | Issue 15 (June 13, 2023)
- *ESG Guidepost* | Issue 2 (May 2023)
- Privacy, Data and Cybersecurity *Quick Clicks* | Issue 3 (March 21, 2023)
- Financial Markets and Funds Quick Take | Issue 12 (March 17, 2023)
- SEC 2023 Examination Priorities (February 27, 2023)
- Foreign Listed Stock Index Futures and Options Approvals November 2022 (November 1, 2022)
- What to Worry About With the SEC's Move to Regulate Private Funds (March 24, 2022)
- SEC Staff Observes Practices of Private Fund Advisers That Raise Concerns (February 11, 2022)
- SEC Proposes Radical Changes to Practices for Private Funds (February 11, 2022)
- SEC Increases Registered Investment Adviser Performance Compensation Net-Worth and Assets-Under-Management Tests (August 13, 2021)
- Crypto, Meet ESG; ESG, Meet Crypto (July 15, 2021)
- Family Offices Receive Increased Regulatory Scrutiny (June 9, 2021)

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- Foreign Listed Stock Index Futures and Options Approval Chart March 2021 (March 25, 2021)
- New York Adopts New Registration and Examination Requirements for Certain Investment Adviser Related Personnel and Solicitors (January 28, 2021)
- Financial Markets Regulation COVID-19 Resource Center (October 22, 2020)
- SEC Proposal to Exempt Certain "Finders" from Broker-Dealer Registration May Allow Significant Capital Raising Activities by Non-Registered Persons (October 19, 2020)
- LIBOR Preparedness Exams Are Coming – Is Your Firm Ready? (June 6, 2020)
- SEC Enforcement Actions Against Fund Advisers Continues (May 15, 2020)
- New York Proposes New Rules to Modernize Securities Filings Affecting Private Funds and Significant Exam and Registration Requirements on "Finders" (May 8, 2020)
- Foreign Listed Stock Index Futures and Options Approval Chart April 2020 (April 28, 2020)
- Revising Initial Expectations: CFTC Proposes Substantial Amendments to Form CPO-PQR and Related Requirements (April 16, 2020)
- COVID-19: Considerations for Private Investment Fund Managers (March 17, 2020)
- Amendments to FINRA New Issue Rules 5130 and 5131 Effective January 1, 2020 (January 9, 2020)
- What Private Fund Advisers and Regulated Entities Should Do About the California Consumer Privacy Act (December 24, 2019)
- SEC Proposes Principles-Based Changes to Investment Adviser Advertising and Solicitation Rules, Seeks Industry Reaction by February 10 (December 13, 2019)

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- Foreign Listed Stock Index Futures and Options Approval Chart October 2019 (October 29, 2019)
- Foreign Listed Stock Index Futures and Options Approval Chart September 2019 (September 11, 2019)
- SEC Warns Advisers to Up Their Game on Proxy Voting (September 10, 2019)
- 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)
- A Review of the SEC Participating Affiliate No-Action Letters' Relief From Investment Advisers Act of 1940 Registration for Foreign Investment Advisers (December 26, 2017)
- 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)
- 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)

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- OTC Derivatives Regulation Under Dodd-Frank: A Guide to Registration, Reporting, Business Conduct, and Clearing (2014)
- 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)
- *Corporate & Financial Weekly Digest* (Weekly) | *Author*

Presentations and Events

- Katten RegWatch: SEC Private Funds Rule — Gearing Up for "Preferential Terms" and "Restricted Activities" Compliance (March 22, 2024) | *Speaker*
- Katten RegWatch: First Impressions of FinCEN's Proposed AML Rule for Investment Advisers (February 21, 2024)
- Katten's Annual Financial Markets and Regulation Crystal Ball — A Look Back at 2023 and a Look Forward to 2024 (February 1, 2024)
- Annual Katten Private Wealth & Fiduciary Seminar (October 11, 2023)
- 2023 Crypto with Katten Annual Symposium (September 27, 2023)
- Private Fund Manager or Public Servant? Practical Questions and Answers on the New Private Funds Rule (September 21, 2023)
- SEC Update: Regulatory and Enforcement Developments for Asset Managers (June 22, 2023)
- Futures & Derivatives: A Look Back and A Look Ahead | The Chicago Bar Association (June 1, 2023) | *Speaker*

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- RSM & Katten Capital Markets Family Office Insights Forum (May 23, 2023) | *Panelist* | *Family Office Structuring Panel*
- Virtual Investment Adviser Core Compliance Program Symposium (April 11–14, 2023) | *Speaker* | *Introduction to the Advisers Act: Framework, Registration, Exclusions and Exemptions; Exempt Reporting Advisers; Private Fund Advisers and More*
- 2023 Crypto with Katten London Symposium (March 1, 2023)
- Katten's Annual Financial Markets and Regulation Crystal Ball Event (January 19, 2023)
- 2022 Crypto with Katten Annual Symposium (October 20, 2022)
- SEC's Proposals on Private Funds — What to Worry About (March 10, 2022)
- 24 Hours of Crypto With Katten (July 14–15, 2021) | *Speaker* | *Crypto, Meet ESG: ESG, Meet Crypto*
- MFA Legal & Compliance 2021 (July 13–14, 2021) | *Panelist* | *Evaluating and Managing Risks Associated with Outsourcing Compliance*
- New SEC Rule Replaces the Decades Old Advertising and Solicitation Rules for Advisers (February 18, 2021) | *Speaker*
- A Brave New World: Effective Supervision and Compliance by CFTC and SEC Registrants in the New Business as Usual Environment (June 18, 2020) | *Panelist* | *Best Practices and Challenges to Address Going Forward*
- Form CRS – A Practical Workshop to Get It Done (March 4, 2020) | *Presenter*
- The National Futures Association's Proposed Revised Requirements for the Supervision of Branch Offices and Guaranteed Introducing Brokers. Get Prepared! (June 20, 2019) | *Presenter*
- Regulatory and Cross-Border Issues for Proprietary Trading Firms (February 4, 2016) | *Panelist*
- Emerging Trends in Securities and Futures Trading Regulation (December 3, 2015) | *Panelist*

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