

Sara J. Chesnut



**Associate**

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Sara's practice involves securities litigation, compliance and enforcement, with an emphasis on conducting internal investigations and assisting clients in Department of Justice, FINRA and SEC investigations and litigation. Sara has assisted clients—individuals, companies and special committees—in internal and governmental investigations on a variety of matters including alleged violations of federal securities laws, broker-dealer and investment adviser regulation, embezzlement, accounting fraud, insider trading and the Foreign Corrupt Practices Act. Sara also assists clients in creating and strengthening compliance programs for various areas of securities regulations including the FCPA, investment adviser regulation and broker-dealer regulation.

**REPRESENTATIVE EXPERIENCE**

- Conducting an internal investigation on behalf of the special committee of a public gas company and representing the company before the DOJ, SEC and State regulatory authorities in connection with the alleged embezzlement of millions of dollars by the company's former CEO and CFO
- Conducting an investigation of FCPA allegations on behalf of the audit committee of a public oil services company arising from its operations in West Africa
- Representing Broker-Dealers and Investment Advisors in connection with FINRA and SEC examinations and enforcement proceedings
- Representing investors in connection with the liquidation of Bernard Madoff Investment Securities
- Obtaining summary judgment in arbitration on behalf of a company denying a former officer's claims for advancement of legal fees
- Representing companies and their executives in SEC investigation into Reg S penny stock promoter
- Representing defendants in "clawback" actions by Madoff Trustee and Stanford Receiver
- Drafting anti-money-laundering, FCPA, third-party due diligence and insider trading policies for public companies

**PUBLICATIONS**

- "Controversial Uses of the "Clawback" Remedy in the Current Financial Crisis" *Texas Bar Journal* (December 2009)

**INDUSTRIES**

Banking/Financial Services  
Energy

**PRACTICES**

Anti-Corruption and the Foreign Corrupt Practices Act (FCPA)  
Commercial Litigation  
Corporate Compliance, Investigations and Defense  
Litigation

**EDUCATION**

JD, 2007, Vanderbilt University School of Law

BA, 2001, *with honors*, Wesleyan University

**ADMISSIONS**

Texas 2007