

Dixie L. Johnson

Partner
*Securities Enforcement and Regulation /
Special Matters and Government
Investigations*

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Dixie Johnson represents businesses and individuals in securities enforcement investigations and conducts internal investigations for corporate board committees and companies. As a partner on our Securities Enforcement and Regulation team and our Special Matters and Government Investigations team, Dixie also serves as Deputy Practice Group Leader for Government Matters, a collection of ten government-facing practices within our firm. She appears regularly before the SEC, DOJ, FINRA, PCAOB and other federal and state authorities. Since she joined King & Spalding in early 2014, the government has closed almost forty investigations without charging Dixie's clients.

Dixie brings to her clients solid judgment and strategic insight from over 30 years of experience in representing public companies, financial institutions, investment managers, broker-dealers, public accounting firms, boards of directors and boards of trustees, law firms, corporate officers and others. She is widely recognized as a legal industry leader in securities enforcement, regulatory compliance, corporate governance and crisis management.

Board committees call on Dixie to investigate accounting and disclosure-related whistle-blower allegations and look to her for guidance in times of crisis. She regularly interacts with lead directors, presiding directors, and non-executive board chairs from many of the largest companies in the world. She is a Fellow of the American College of Governance Counsel and, for five years, was a member of the Lead Director Network.

Public companies and regulated entities seek Dixie's representation in complex securities-related government investigations. C-Suite officers and other professionals look to Dixie for representation in internal and SEC or other investigations when their careers are on the line. She is a lawyer's lawyer, representing law firms and lawyers under scrutiny. Her bench is deep and highly skilled. She analyzes lessons learned and especially enjoys counseling clients on how to avoid problems in the future.

Chambers USA, Legal 500, Benchmark, Who's Who, Best Lawyers and others all consistently rank Dixie as a leading lawyer, and *Chambers* included our practice on the 2017 short list of firms for Securities and Financial Services Regulation. *Chambers* has noted that she is "a very strong and thoughtful lawyer with an encyclopedic knowledge of securities laws," (2019), she "wins praise across the board for her 'terrific relationship with the SEC.'" (2018) and she leads an "expert,

broad-based enforcement practice.” (2017) Dixie also has served in multiple leadership roles within the American Bar Association, including as Business Law Section Chair, Chair of the Federal Regulation of Securities Committee, and co-Chair of the Fellows Committee. She is a member of the Board of Trustees for the Legal Aid Society of Washington, D.C. and the Board of Advisors for the SEC Historical Society. Before becoming a lawyer, Dixie served for six years as a public school teacher in Albuquerque, New Mexico.

See examples of Dixie’s recent matters in the section below.

Matters

Representing a **bank** in multiple DOJ, SEC and state investigations concerning residential mortgage backed securities, including matters involving the Presidential RMBS Task Force.

Representing a **public healthcare company** in an SEC investigation concerning rounding in its calculations of earnings per share (EPS rounding).

Representing a **public consumer goods company** in an SEC investigation concerning a goodwill impairment charge.

Representing a **former manufacturing public company CFO** in connection with an SEC investigation concerning accounting and other issues.

Represented a **public utility company** in an SEC investigation concerning disclosures and accounting related to a significant construction project.

Represented a **board of directors** of a privately held company concerning its token offerings (sometimes referred to as an initial coin offering, or ICO), another privately held company in an SEC investigation regarding its token offering, and a registered investment adviser in connection with an SEC review of a contract involving crypto-currencies.

Conducted an **internal investigation for a public data analytics company audit committee** concerning whistle-blower allegations involving revenue recognition, disclosure, internal controls and retaliation.

Represented a **law firm** in connection with an SEC investigation concerning the firm's former private equity client.

Represented a registered **investment** adviser in an SEC investigation concerning valuation issues

Conducted an internal investigation for a **public energy company special committee** concerning product disclosures.

Represented a **former CEO** of an investment management firm in SEC and DOL investigations concerning investment products

Represented a former CFO of an investment management firm in an SEC investigation concerning accounting issues.

Represented a **former medical device public company CFO** in connection with SEC and DOJ investigations involving financial statements that the CFO certified and a concurrent FCPA issue.

Represented a **broker dealer compliance officer** in an SEC investigation concerning trading activities.

Represented a **pension fund** in connection with an SEC investigation involving the fund's investment activities, after which the SEC closed the investigation without bringing charges.

Represented a **public life sciences company** in an SEC investigation concerning its investor relations activities.

Represented an **audit firm** in a PCAOB inquiry concerning auditor independence.

Credentials

EDUCATION

J.D., University of New Mexico, Order of the Coif

M.B.A., New Mexico Highlands University, summa cum laude

B.A., Oklahoma Baptist University, magna cum laude

ADMISSIONS

District of Columbia

ASSOCIATIONS

Fellow, American College of Governance Counsel

Member, American Law Institute

Chair, 2,700-member ABA Committee on Federal Regulation of Securities, 2003-2006

Co-Chair, ABA Business Law Fellows Committee, 2016-2019

American Bar Association (Chair, 50,000-member Business Law Section, 2013-2014)

previously co-chaired Subcommittee on Civil Litigation and SEC Enforcement Matters)

Advisory Board, Securities & Exchange Historical Society

Recognition

Recognized for Administrative/Regulatory Law, Corporate Compliance Law, Securities Litigation and Securities Regulation

BEST LAWYERS IN AMERICA, 2020

Named Lawyer of the Year for Washington D.C. Litigation - Securities

BEST LAWYERS IN AMERICA, 2019

Named among the world's Top 100 Women in Investigations, in "a competitive and notoriously tough area of law"

GLOBAL INVESTIGATIONS REVIEW, 2018

Honored as one of 25 White Collar Regulatory & Compliance Trailblazers

NATIONAL LAW JOURNAL, 2018

Praised by clients for "her ability to craft workable solutions to problems"

CHAMBERS USA, NATIONAL SECURITIES REGULATION: ENFORCEMENT, 2007–2018

Commended for "her strong judgment, creative approach and excellent rapport with clients, peers

and regulators"

CHAMBERS USA, NATIONAL SECURITIES REGULATION: ENFORCEMENT, 2007–2018

Consistently recognized in multiple categories including Financial Services: Litigation and in White-Collar Criminal Def

LEGAL 500

Named Lawyer of the Year for Washington D.C. Corporate Compliance

BEST LAWYERS IN AMERICA, 2014–2016

Consistently highlighted in the practice areas of Administrative/Regulatory Law, Corporate Compliance, Law, Litigation

SECURITIES, SECURITIES REGULATION (2014-2017)

Named to Enforcement 40 list of top SEC enforcement lawyers

SECURITIES DOCKET, 2013 AND 2017

Recognized as a Washington D.C. Litigation Star and one of the top 250 women in Litigation

BENCHMARK: LITIGATION

Selected as one of Washington's Top Lawyers

WASHINGTONIAN MAGAZINE, 2011

Awarded the "Jean Allard Glass Cutter Award"

ABA'S BUSINESS LAW SECTION, 2006

Insights

CLIENT ALERT

September 28, 2021

SEC Enforcement of Human Capital Disclosures: The First Fingerprints

FEATURE

February 10, 2021

General Counsel Internal Investigations Decision Tree for the Automotive Industry

January 22, 2021

General Counsel Internal Investigations Decision Tree for the Energy Industry

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Events

SPEAKING ENGAGEMENT

November 2, 2021

Craig Carpenito, Dixie Johnson, Nikki Reeves, Seth Lundy to Speak at Virtual 22nd Annual Pharmaceutical and Medical Device Ethics and Compliance Congress

January 25, 2021

Dixie Johnson, Richard Walker to Speak on 2021 Securities Regulation Institute's Virtual Conference

WEBINAR

November 10, 2020

13th Annual King & Spalding Medical Device Summit

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News

IN THE NEWS

November 8, 2021 • Source: Capital & Main

Dixie Johnson, Amanda Sonneborn and Keith Townsend's client alert that examined the SEC enforcement of human capital disclosures is referenced

RECOGNITION

November 10, 2021

GIR Names King & Spalding to List of Top 30 Global Investigations Firms for Seventh Year

October 13, 2021

Benchmark Litigation Recognizes King & Spalding as a Leading Litigation Firm

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