

Meghan E. Flinn

Partner

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OVERVIEW

Meghan Flinn is a partner in the White Collar Defense and Investigations group. She focuses her practice on government investigations and enforcement actions, internal investigations, and complex regulatory and private litigation matters at the trial and appellate level.

Meghan represents individuals, investment advisers, broker-dealers, public companies, banks, and other financial institutions before various state and federal regulators and enforcement authorities. These include the Securities and Exchange Commission (SEC), the Consumer Financial Protection Bureau (CFPB), the US Department of Justice (DOJ), the Financial Industry Regulatory Authority (FINRA), and state banking and securities regulators.

Meghan has extensive experience defending and counseling clients at each juncture of a government investigation, including with respect to subpoena responses, investigative testimony, and Wells submissions. She also represents clients in connection with government enforcement proceedings and litigation, investor lawsuits and class actions, and arbitrations with a concentration on the securities and financial services industries.

Her experience extends to defending and counseling clients in matters concerning, among other things:

- Insider trading, disclosure issues, sales practice violations, and other securities fraud allegations
- Gatekeeper or secondary liability under the securities laws
- Section 36(b) of the Investment Company Act of 1940
- Mutual fund board policies and procedures, including Section 15(c) of the Investment Company Act of 1940
- Foreign Corrupt Practices Act (FCPA) and other anti-corruption and anti-bribery laws
- Compliance and supervisory issues
- DOJ and qui tam claims asserted under the False Claims Act (FCA)
- Receiverships in SEC enforcement cases
- Collateral consequences and statutory disqualifications under the federal securities laws
- Regulatory examinations, including responses to exam deficiency letters

Additionally, Meghan assists clients with internal investigations to assess potential civil or criminal exposure in these and other areas.

Meghan has been selected to the Washington, D.C., Rising Stars list in the areas of White Collar Defense and Securities Litigation each year since 2020.

Meghan chairs the Washington, D.C., office's Women in the Profession Committee and serves on the firmwide Women in the Profession Committee. She is also a member of the Young Professionals Committee of the Women in White Collar Defense Association and the Women's Bar Association of the District of Columbia. She is involved in various pro bono matters at K&L Gates, including representing a client in federal habeas proceedings and conducing research on behalf of a local victims' rights organization.

Prior to joining the firm, Meghan had the privilege of serving as a law clerk for the Honorable Joseph R. Goodwin for the US District Court for the Southern District of West Virginia, where she assisted in managing the civil docket and the multidistrict (MDL) docket that contained over 70,000 product liability actions. In addition, she worked as a judicial extern for the Honorable Robert B. King for the US Court of Appeals for the Fourth Circuit.

ACHIEVEMENTS

- Recognized by *The Legal 500 United States* as a Recommended Lawyer for Corporate investigations and white-collar criminal defense: advice to individuals and Corporate investigations and white-collar criminal defense: advice to corporates, 2024

PROFESSIONAL / CIVIC ACTIVITIES

- Women in White Collar Defense Association, Young Lawyers Committee (2019-present)
- Women in Law Empowerment Forum (WILEF), Washington, DC Chapter, Young Lawyers Committee Member (2019-2022)
- Women's Bar Association of the District of Columbia (2018-present)

SPEAKING ENGAGEMENTS

- Panelist, “From Search to Selection: How Attorneys Pick Their Experts,” Securities Experts Roundtable Annual Expert Conference, Washington, DC, 6-7 August 2026
- Asset Management and Investment Funds Fall Conferences, Washington, DC, 2 November 2023
- Panelist, Enforcement and Examinations, K&L Gates Asset Management and Investment Funds Conference, Washington, DC, 2 November 2022
- Panelist, “Attorney-Client Privilege for Financial Institutions in Internal Investigations, Audits, and Bank Regulatory Exams: Confidential Information and Work Product; Bank Examination Privilege; Section 1828 Selective Waiver,” Strafford Publications CLE Webinar, January 2019

EDUCATION

- J.D., Washington and Lee University School of Law, 2014 *(magna cum laude; Executive Editor, Washington and Lee Law Review; Order of the Coif)*
- B.A., West Virginia University, 2011 *(summa cum laude, Phi Beta Kappa)*

ADMISSIONS

- Bar of District of Columbia
- Bar of Maryland
- Bar of West Virginia (Active Not Practicing)
- United States Court of Appeals for the Fifth Circuit
- United States Court of Appeals for the Fourth Circuit
- United States Court of Appeals for the Second Circuit
- United States District Court for the District of Maryland
- United States District Court for the Southern District of West Virginia

THOUGHT LEADERSHIP *POWERED BY HUB*

- 26 October 2026, United States: The FY 2027 Exam Priorities Get a Pumpkin Spice Makeover
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- 29 July 2026, Not a Cost of Doing Business: DOJ and DHS Issue New Benchmark Guide for Trade Fraud Compliance
- July 2026, Signed, Sealed, Scrutinized: DEI, Certifications, and FCA Risk
- 11 June 2026, United States: Supreme Court Holds SEC Does Not Need to Prove Pecuniary Loss in Disgorgement
- 19 May 2026, United States: The SEC Finally Admits It, The No-Admit/No-Deny Policy Is Gone
- 18 May 2026, United States: Keeping Up Tradition: Director Woodcock's Signals a Continuation of Recent Enforcement Priorities
- 14 April 2026, DOJ Announces First False Claims Act Case Targeting DEI Programs
- 9 April 2026, United States: New Sheriff, New Stats: Reading Between the Lines of the SEC's Enforcement Report

- 13 February 2026, United States: The Judge Speaks: The SEC's New Enforcement Director Provides First Glimpse into Her Priorities
- February 2026, Trade and Customs Enforcement and Investigations
- 1 December 2025, SEC Examination Priorities Show Continued Focus on Risks in Changed Enforcement Environment
- October 2025, 2025 Asset Management and Investment Funds Fall Conference—Washington, DC
- 4 August 2025, DOJ Guidance Aims to Clarify "Illegal DEI," Raising the Stakes for Potential Investigations and Enforcement
- June 2025, DEI Enforcement: New Signals to Expect "Aggressive" Investigations and Litigation under the False Claims Act
- April 2025, Predictions for Financial Regulatory Enforcement Under the Trump Administration
- March 2025, DEI Enforcement: False Claims Act and Other Risks on the Horizon
- February 2025, Asset Management Regulatory Year in Review 2024
- 11 July 2024, Federal Agencies Have Placed a Heightened Priority on Whistleblowers and Speedy Cooperation
- 3 July 2024, Jarkesy's Impact on Agency Enforcement Proceedings: Potential Implications for the SEC and Beyond
- May 2024, Handling Allegations of Noncompliance: Internal Investigations and Self-Reporting
- 2 November 2023, Asset Management and Investment Funds Fall Conferences - Washington, D.C.
- 1 November 2023, The SEC Publishes 2024 Examination Priorities Ahead of Schedule, Previewing Key Areas of Focus for Registered Entities
- 31 October 2023, Addressing Whistleblower Claims Under Sarbanes-Oxley and Beyond: US Supreme Court Hears Argument on Burden of Proof Requirements
- 6 April 2023, Fifth Circuit Affirms Dismissal of Derivative Suit Against Mutual Fund Adviser and Trustees
- March 2023, Embracing Equity: Gender Equity, Intersectionality, and Elimination of Glass Ceilings
- 11 April 2022, The SEC's Division of Examinations Publishes 2022 Examination Priorities and Previews Key Focus Areas for Registered Investment Advisers and Broker-Dealers
- 21 December 2020, 2021: A New Year, the Same Fear - Why Companies Should Expect a Wave of PPP Investigations
- 22 October 2020, SEC Speaks 2020: Enforcement and Examination Highlights
- 3 July 2019, Court Grants Summary Judgment to Defendant Investment Adviser in Section 36(b) Excessive Fee Lawsuit

- 18 January 2019, An Update on False Claims Act Litigation: Circuit Splits and Other Developments in 2018
- 28 February 2018, Supreme Court Resolves Debate Over the Scope of the Dodd-Frank Whistleblower Protection Provisions
- 7 December 2017, Takeaways from the 34th International Conference on the Foreign Corrupt Practices Act
- 30 May 2017, D.C. Circuit Considers Reversal of Earlier Decision and May Declare SEC Administrative Law Judges Inferior Officers Subject to Appointment
- 10 January 2017, Tenth Circuit Decision Finds Against the SEC and Creates a Circuit Split on the Constitutionality of the Commission's ALJs
- 5 July 2016, The First Ninety Days of the FCPA Unit's Pilot Program
- 30 November 2015, Second Circuit Filing Re-Ignites Debate over the Scope of the Dodd-Frank Whistleblower Protection Provisions

OTHER PUBLICATIONS

- "Takeaways for SEC enforcement: Looking back at FY 2025 and the first six months of Chairman Atkins," *Thomson Reuters*, October 2025
- "SEC and CFTC Whistleblower Rules and Anti-Retaliation Protections," Practical Law Institute, Investment Adviser Regulation Treatise, March 2021
- "Satisfying the Banking Regulator's "Right to Know" While Maintaining Confidentiality of Privileged Material: The Privileges and Protections Available to Banking Institutions," *Journal of Taxation and Regulation of Financial Institutions*, Spring 2017
- A Continuing War with Asbestos: The Stalemate Among State Courts on Liability for Take-Home Asbestos Exposure, 71 Wash. & Lee L. Rev. 707 (recipient of the 2013 Roy L. Steinheimer Award for outstanding student Note)

NEWS & EVENTS

- 29 October 2026, Asset Management and Investment Funds Conference Series—New York
- 4 February 2026, Trade and Customs Enforcement and Investigations
- 15 November 2024, K&L Gates Named Among the Top 30 Investigations Firms Worldwide by *Global Investigations Review*
- 10 July 2024, Media Cover K&L Gates' Response to US Supreme Court's Chevron Decision
- 19 December 2022, K&L Gates Adds 40 Lawyers to Firm's Partnership

OTHER MEDIA MENTIONS

- Quoted, “Chevron Ruling May 'Hamstring' SEC Rulemaking Agenda: Lawyers,” *FundFire* and *Financial Advisor IQ*, 1 July 2024

AREAS OF FOCUS

- White Collar Defense and Investigations
- Anti-Bribery and Anti-Corruption
- Federal, State, and Local False Claims Act
- Financial Institutions Special Situations
- Internal Investigations
- Securities Enforcement / Financial Regulatory Enforcement
- US Congressional Investigations

INDUSTRIES

- Financial Services

REPRESENTATIVE EXPERIENCE

REGULATORY INVESTIGATIONS AND ENFORCEMENT MATTERS

- Represented a major international and publicly-traded construction company in responding to FCPA and related inquiries from the DOJ and SEC FCPA Units.
- Advised a mortgage lender in a False Claims Act investigation brought by the DOJ and the Department of Housing and Urban Development (“HUD”) concerning the origination of FHA loans under the Direct Endorsement Lending program.
- Represented an oil and gas company in responding to a grand jury subpoena relating to a potential bribery scheme.
- Defended a sales supervisor at a large broker-dealer in an investigation brought by the SEC’s Public Finance Abuse Unit, resulting in the declination of an enforcement action.
- Assisted a large bank in responding to a CFPB investigation and civil investigative demands arising from a mortgage servicing examination.
- Advised an investment adviser in responding to a subpoena issued by the Investor Protection Bureau of the Office of the New York Attorney General relating to mutual fund disclosures.

- Defended an attorney in an SEC investigation of potential secondary fraud liability, resulting in the declination of an enforcement action.
- Defended an investor relations professional at a technology company in an SEC investigation of a potential Regulation FD violation, resulting in the declination of an enforcement action.
- Defended a registered representative in a FINRA investigation and subsequent litigation involving allegations relating to certain outside business activities and private securities transactions.
- Defended an individual in an SEC enforcement proceeding filed in federal court asserting claims of aiding-and-abetting securities fraud in connection with the artificial inflation of the price of securities and the sale of unregistered securities.
- Represented a large dually-registered broker-dealer and investment adviser in a FINRA investigation concerning customer disclosures and supervisory procedures relating to alternative investments.
- Represented numerous investment firms in responding to state regulatory inquiries concerning a variety of issues including environmental social governance (ESG) matters and fee arrangements.

INTERNAL INVESTIGATION MATTERS

- Assisted an international energy company in conducting an internal investigation of alleged employee misconduct arising from a whistleblower report.
- Conducted an internal investigation for an investment adviser relating to certain portfolio management policies, procedures, and practices.
- Assisted a technology client with an internal investigation concerning information security practices.
- Led an internal investigation of potential employee misconduct for a local non-profit organization.
- Conducted an internal investigation regarding allegations of financial fraud, conflicts of interest, violations of environmental laws, and retaliation involving a utility company.
- Represented the audit committee of a publicly traded company in conducting an internal investigation into accounting and revenue reporting and related internal controls matters.

LITIGATION MATTERS

- Obtained summary judgment on behalf of a mutual fund provider in a lawsuit brought in federal district court alleging excessive advisory fees under Section 36(b) of the Investment Company Act and defended the client in the appeal of the dismissal, which was affirmed by the Second Circuit.
- Represented a national bank in an FHA lawsuit filed by county governments challenging mortgage loan origination, servicing, and foreclosure practices.
- Represented a dually-registered broker-dealer and investment adviser in an investor class action and FINRA arbitrations brought by customers alleging claims relating to product due diligence and suitability review, including an arbitration matter that was dismissed in full following a multiple-day hearing.

- Defended a Chinese manufacturing company in an investor class action filed in federal district court asserting claims relating to alleged stock price manipulation.
- Successfully obtained dismissal of a breach of contract claim on behalf of a global manufacturer at the pleadings stage in federal district court and on appeal before the Fourth Circuit.
- Defended a wealth management firm in a lawsuit brought by the court-appointed receiver to a receivership organized as part of an SEC enforcement action.
- Pursued a habeas petition at the federal district and appellate level on behalf of a client relating to the constitutionality of his criminal conviction as a juvenile.