



Suzanne Jaffe Bloom

Partner
Co-Chair, Government Investigations, Enforcement, and Compliance

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Suzanne is a former federal prosecutor (SDNY and EDNY) who is consistently recognized as one of New York’s top lawyers in white collar criminal defense and government investigations and described as “exceptionally smart and tenacious” and “an outstanding strategist and a great trial lawyer.” (*Chambers USA 2018*) Suzanne is a dedicated advocate for her clients, who benefit from her wealth of government experience. Suzanne’s keen insights, strategic acumen, and ability to mount vigorous defenses allow her to achieve her clients’ goals in a highly effective manner, at times preventing government charges or claims from being filed in the first instance.

Suzanne’s extensive experience with government matters both on the prosecution and the defense side, coupled with her strong advocacy skills and commitment to her clients, enables her to achieve highly favorable results for her clients in some of their most sensitive matters.

Suzanne, Co-Chair of the firm’s Government Investigations, Enforcement, and Compliance Practice, represents public and private companies and organizations, special board committees, financial institutions, investment firms, private equity funds, corporate executives, and other individuals in all aspects of government criminal and civil

investigations and related litigation, including those led by federal and state enforcement and/or regulatory authorities, often on multiple fronts at once, including those led by the Department of Justice (DOJ), regional U.S. Attorney's Offices, state and federal regulatory agencies, and State Attorney General Offices. She defends clients in connection with a wide range of issues, including the False Claims Act (FCA) and related *qui tam*/whistleblower litigation, the Foreign Corrupt Practices Act (FCPA), the Medicare Secondary Payer Act, government program fraud, bribery and the Anti-Kickback Statute, health care fraud, government contracting fraud, insider trading, accounting fraud, tax fraud, embezzlement, money laundering, public corruption, securities fraud, and obstruction of justice. In addition, Suzanne counsels clients on the development, implementation, and enhancement of compliance and remediation programs and provides valuable guidance for achieving compliance objectives and minimizing the risk of government investigations and related actions. She has also served as counsel to state regulators in connection with the monitoring of several large insurance brokerage firms following a multistate investigation of allegations of bid-rigging and other wrongdoing.

Suzanne previously served as a prosecutor in both the U.S. Attorney's Office for the Southern District of New York (S.D.N.Y.) and the U.S. Attorney's Office for the Eastern District of New York (E.D.N.Y), where she was Deputy Chief of the Long Island Criminal Division, overseeing its corporate fraud and complex white collar matters. During her 12 years as a federal prosecutor, Suzanne conducted numerous grand jury investigations and federal jury trials, and successfully investigated and prosecuted sophisticated white collar crimes, including those involving alleged health care fraud, government contracting fraud, public corruption, money laundering, tax offenses, bank fraud, and securities fraud. Suzanne also led joint criminal and civil investigations involving alleged violations of the FCA.

Key Matters

FALSE CLAIMS ACT – GOVERNMENT CONTRACTING, SBA, CARES ACT (PPP, EIDL, ETC.) – REPRESENTATIVE MATTERS

- Representations of lenders in connection with government investigations related to CARES Act programs, including the Paycheck Protection Program and the Economic Injury Disaster Loan programs.
- Representations of borrowers in connection with investigations related to CARES Act programs, including the Paycheck Protection Program and the Economic Injury Disaster Loan programs.
- Provided compliance counseling for government contractor on issues related to the FCA, the Program Fraud Civil Remedies Act, the Federal Acquisition Regulations, the System for Award Management, the Central Contract Registration System, and the Small Business Act.
- Represented a Fortune 100 company in connection with parallel FCA investigations involving government contracts for technology and security equipment conducted on multiple fronts at once by federal and state authorities, including the Department of Justice, the U.S. Attorney's Office for the Western District of New York, and the Office of the Attorney General for approximately 15 states and the District of Columbia. Secured declinations from the states, the District of Columbia, and the federal government on the merits and negotiated a favorable resolution that included dismissals of all of the claims in the pending *qui tam*.
- Represented an international client in the manufacturing industry in connection with a *qui tam* complaint filed in New York asserting violations of the New York state and city false claims acts with respect to product sales to state purchasers. Secured voluntary dismissal with prejudice of all of relator's claims in the *qui tam*.

FALSE CLAIMS ACT – HEALTH CARE – REPRESENTATIVE MATTERS

- Represented a multinational insurance company and certain affiliates in defense of a False Claims Act action based on alleged violations of the Medicare Secondary Payer Act, obtaining a pre-trial dismissal of the action with prejudice. Thereafter, successfully represented clients in connection with the appeal of the decision to the Second Circuit Court of Appeals, securing an affirmance of the lower court's dismissal with prejudice.

- Defended a Fortune 500 company in connection with confidential criminal and civil investigations by several U.S. Attorney's Offices and State Attorney General's Offices involving alleged violations of the Anti-Kickback Statute and the FCA and several related *qui tam* actions, preventing criminal charges against client and securing favorable resolutions of the various *qui tam*.
- Represented a public company with global operations in connection with a confidential investigation of alleged violations of the FCA by the U.S. Attorney's Office for the Southern District of New York. Secured a declination of intervention from the federal government and a favorable resolution with the *qui tam*.
- Obtained a significant victory for a Fortune 500 company by securing a voluntary dismissal of *qui tam* claims brought under federal and state false claims acts based on allegations of health care fraud with respect to the purchase and sale of certain drugs. Secured dismissal of all claims against the company, without the company being required to make any settlement payments.
- Represented a Fortune 500 company in a *qui tam* action brought under federal and state false claims acts based on alleged unlawful kickback arrangements. Secured a declination of intervention from the relevant state and federal government authorities and a favorable resolution of the *qui tam* litigation.
- Represented a Fortune 500 company in connection with five *qui tam* actions consolidated in the District of Massachusetts, which were brought under federal and state false claims acts and involved wide-ranging allegations of health care fraud. Negotiated settlement agreements with the relevant federal and state government authorities and *qui tam* relators, securing a favorable disposition of all five matters for the company.
- Represented a rehabilitation therapy services provider servicing hundreds of facilities nationwide in connection with a government investigation by the DOJ and the US Attorney's Offices for the Eastern and the Western Districts of Michigan and three related *qui tam* complaints asserting wide-ranging claims of FCA violations. Secured declinations from the government on the merits and negotiated a favorable resolution that included dismissals of all of the claims in the pending *qui tam*.

FINANCIAL FRAUD, THEFT, EMBEZZLEMENT – REPRESENTATIVE MATTERS

- Representations of companies in connection with State Attorney General investigations involving allegations of fraud and deceptive trade practices.
- Representation of international organization in connection with internal investigation of alleged fraud and theft and provided guidance related to proactive defense of allegations and related compliance measures.
- Represented a private company in connection with a confidential federal criminal investigation involving allegations of fraud, theft, and embezzlement, successfully preventing criminal charges against client.
- Represented individuals in connection with civil litigation involving claims of financial fraud and theft, obtaining dismissal of all claims.

SECURITIES – REPRESENTATIVE MATTERS

- Represented individuals in connection with confidential criminal investigations of allegations of insider trading and obstruction of justice, successfully avoiding charges against certain clients.
- Represented the board of directors of a public software company in connection with an internal investigation of the conduct and stock trading activities of the company's CEO.
- Represented the audit committee of a Fortune 500 company with international operations in connection with an internal investigation of allegations of accounting and securities fraud.

FCPA – REPRESENTATIVE MATTERS

- Represented an executive of a Fortune 100 company with worldwide operations in connection with a confidential DOJ investigation of alleged violations of the FCPA. No charges filed.
- Represented executive in financial services industry in connection with FCPA and related SEC investigation.

- Represented the Audit Committee of a Fortune 500 company in connection with the oversight of more than 40 internal investigations conducted worldwide, involving allegations of violations of the FCPA, money laundering, and accounting irregularities; the issuance of related financial restatements; and related SEC inquiries.

MEDICARE SECONDARY PAYER ACT – REPRESENTATIVE MATTERS

- Represented insurance company affiliate of a multinational insurance company in two class actions in Southern District of Florida asserting claims for alleged violations of the Medicare Secondary Payer Act and subrogation based on purported assignments from Medicare Advantage Organizations and other related entities. Following arguments for dismissal, plaintiffs voluntarily dismissed both actions against client.
- Represented insurance company affiliates of a multinational insurance company in a class action in the Southern District of New York asserting claims for alleged violations of the Medicare Secondary Payer Act and subrogation based on purported assignments from Medicare Advantage Organizations. Secured a pre-trial dismissal of all pending claims against client.
- Represented a multinational insurance company and certain affiliates in defense of a False Claims Act action based on alleged violations of the Medicare Secondary Payer Act, obtaining a pre-trial dismissal of the action with prejudice. Thereafter, successfully represented clients in connection with the appeal of the decision to the Second Circuit Court of Appeals, securing an affirmance of the lower court’s dismissal with prejudice.

OFFICIAL CORRUPTION – REPRESENTATIVE MATTERS

- Represented private equity firms in connection with a nationwide investigation by the SEC and State Attorney General’s Offices of allegations of official corruption related to public pension funds, successfully avoiding charges against clients.
- Represented a managing director of a financial institution in connection with an internal investigation of allegations regarding official corruption, securing favorable resolution.

ADDITIONAL AREAS – REPRESENTATIVE MATTERS

- *Sex Assault/Trafficking* – Representations of clients in connection with federal government investigations of sex trafficking allegations.
- *Tax* – Represented an international financial institution in connection with a federal grand jury investigation and related civil litigations involving allegations of violations of civil and criminal tax laws, securing favorable resolutions.
- *Tax; Organizational Governance; Compliance Counseling* – Represented the executive committee of a large professional services firm in connection with its internal investigation of allegations of wrongdoing and the development and implementation of a remediation and compliance program.
- *Corporate Governance; Investor Litigation* – Represented an investor in a biotechnology company in connection with civil litigation involving organizational governance issues, securing favorable resolution.
- *Compliance Counseling* – Counseled the Audit Committee of a Fortune 500 company in connection with the development and implementation of worldwide compliance and remediation plans concerning, among other things, compliance with the FCPA, related anti-bribery laws, and anti-money laundering laws, following worldwide internal investigations.
- *Insurance; Compliance Monitoring* – Represented state regulator in connection with the examination and compliance monitoring of several insurance brokerage companies in the wake of a multistate investigation of alleged wrongdoing and the resulting settlement agreements.

U.S. ATTORNEY’S OFFICE FOR THE S.D.N.Y. – REPRESENTATIVE MATTERS

- Led joint criminal and civil investigations involving alleged government program fraud and violations of the federal False Claims Act and related statutes.

- Led investigation and successful prosecution of 15 present and former police officers and detectives with the New York City Police Department on various federal tax charges, including tax evasion and conspiracy to defraud the United States.
- Responsible for the successful prosecution of corrupt construction contractors and attorneys on charges of bribery relating to construction contracts with the New York City Board of Education and the School Construction Authority.
- Led an investigation of corruption within the International Ladies Garment Workers Union and the Ladies Apparel Contractors Association, resulting in the conviction of several labor union officials and garment contractors on labor racketeering charges, including conspiracy and bribery.
- Responsible for the successful prosecution of a DEA Special Agent and other DEA employees on charges relating to public corruption and narcotics conspiracies.
- Led an investigation of corruption at the New York Office of the U.S. Immigration & Naturalization Services (INS), resulting in arrests and convictions of INS employees and brokers on various charges, including conspiracy, bribery, trafficking in fraudulently obtained INS documents, and establishing a commercial enterprise to evade the immigration laws.

U.S. ATTORNEY'S OFFICE FOR THE E.D.N.Y. – REPRESENTATIVE MATTERS

- Led joint criminal and civil investigations involving alleged government program fraud and violations of the federal False Claims Act and related statutes.
- Led an investigation of corruption at the Village of Hempstead Housing Authority (HHA) resulting in conviction of a former HHA supervisor, the former Director of Public Relations at the Economic Opportunity Commission of Nassau County, and a local contractor on extortion, bribery, and tax charges.
- Led an investigation and prosecution of 53 individuals charged in connection with fraudulent securities offerings attempting to raise more than \$48 million nationwide, resulting in convictions on various counts of securities fraud and related charges.
- Led several individual and corporate investigations and successful prosecutions involving conspiracies to defraud the United States and violations of the federal tax laws.
- Led an investigation and successful prosecution of individuals involved in money laundering and fraud on behalf of owners and investors of medical imaging companies.
- Led a joint federal and state investigation of a nationwide fraud perpetrated by the principals of several loan brokerages and funding companies operating out of New York, resulting in convictions of principals on several counts of conspiracy and mail fraud.

Recent Experience

Prevailed before Supreme Court for Omnicare in Landmark Securities Act Case

Recognitions

Suzanne is included in *Benchmark Litigation's* 2019–2023 “Top 250 Women in Litigation.” She is listed in the 2023 and 2024 editions of *Benchmark Litigation US* as a “New York Litigation Star” for White Collar Crime. She was named to *The Best Lawyers in America*® for her work in Criminal Defense: White Collar in 2021–2024, Health Care Law in 2023, and *Qui Tam* Law in 2023–2024. She is ranked in *Chambers USA* 2012–2023 as one of New York’s top lawyers in white collar and government investigations practice. Suzanne is also recognized in *The Legal 500 US* 2019–2023 as a “Leading Lawyer” for “Corporate Investigations and White Collar Criminal Defense: Advice to Corporates.” She is recognized in *Lawdragon's* “500 Leading Litigators in America” in 2023 and 2024 for White Collar, Investigations, *Qui Tam*, and FCA. Suzanne is consistently recognized as a New York “Super Lawyer” in *Super Lawyers*. She is also identified as a “leading practitioner” in the field of white collar crime, corporate compliance, and regulatory enforcement in *Who's Who Legal: Investigations 2019* and recommended as a “Global Leader” for Investigations in the 2022 edition. In addition, Suzanne is recognized in the List of Top Women Attorneys in the New York Metro Area (*New York Times Magazine*). Suzanne is rated with AV® Peer Review Rating from Martindale-Hubbell (highest rating) and received the 2007 “Burton Award for Legal Achievement.”

Activities

Suzanne is a member of the Harvard Law School Women’s Alliance, the Harvard Law School Alumni Association, the Women’s White Collar Defense Association, the New York City Bar Association – Women in the Legal Profession Committee, White Collar Crime Subcommittee, the Steering Committee of the Harpur Law Council, and the Bechdel Group. Suzanne was also a founding member of the New York City Bar Association’s Dewey Medal Committee, honoring outstanding prosecutors from each of the District Attorney’s offices in New York City. In addition, Suzanne served on Law360’s 2018 White Collar Editorial Advisory Board and currently serves on Law360’s 2021 Compliance Editorial Advisory Board. Suzanne is a member of the New York State Bar.

Credentials

EDUCATION

Suzanne earned a J.D., *cum laude*, from Harvard Law School and graduated *summa cum laude* from the State University of New York at Binghamton, where she received a Bachelor of Science in business management and the Horwitz Award for Excellence in Business Management.

ADMISSIONS

- New York

Related Insights & News

PUBLICATIONS

- [“2023 DOJ FCA Enforcement: Expectations for Future,”](#) Bloomberg Law, April 5, 2024
- [“Come See Us Before We Come See You – DOJ Announces New Whistleblower Program Intensifying Corporate Enforcement Efforts,”](#) Investigations, Enforcement, & Compliance Alerts, Co-author, March 14, 2024
- [“Supreme Court’s False Claims Ruling Leaves Plenty to Litigate,”](#) Bloomberg Law, Jun. 13, 2023

- [“DOJ’s Changes to Corporate Enforcement Policy Present Obstacles,”](#) Bloomberg Law, Feb. 1, 2023
- [“Tips to Follow DOJ Guidance and Survive Corporate Investigations,”](#) Bloomberg Law, Jan. 6, 2023
- [“How to Navigate DOJ’s Update on Corporate Criminal Enforcement,”](#) Bloomberg Law, Oct. 26, 2022
- [“Guide to Monitorships: Succeeding Across a Monitor’s Audiences,”](#) Global Investigations Review, Apr. 2022
- [United States: DOJ’s Initiatives For Ramping Up White Collar Enforcement Reveal Focal Points For Reducing Corporate Risk,](#) Mondaq, Mar. 28, 2022
- [What Companies Can Learn From The 2021 FCA Recovery Statistics,](#) Law360, Feb. 16, 2021
- [AAG Polite Warns of Rigorous DOJ Scrutiny, Urging Companies to Beef up Compliance Programs,](#) Dec. 16, 2021
- [DOJ Announces New Rules for Federal Monitors of Governmental Entities,](#) Oct. 1, 2021
- [“United States: DOJ Continues To Use The False Claims Act To Protect PPP Funds,”](#) Mondaq, Sept. 8, 2021
- [“FCA Playbook: DOJ Announces Establishment of COVID-19 Fraud Enforcement Task Force,”](#) Bloomberg Law Convergence, Jun. 1, 2021
- [“United States: Recently Announced Plea Agreements And New DOJ Task Force Signal Aggressive Pursuit Of Fraud Targeting Pandemic Relief Programs,”](#) Mondaq, May 31, 2021
- [“United States: Important Lessons From The Second FCA Settlement Involving Alleged False Statements By PPP Borrower And Its CEO,”](#) Mondaq, May 6, 2021
- [“7 False Claims Act Enforcement Trends To Watch,”](#) Law360, Feb. 15, 2021
- [“DOJ’s FY 2020 False Claims Act Statistics – Understanding Where We Have Been and Where We Are Headed,”](#) Jan. 26, 2021
- [“DOJ Announces First Settlement to Resolve Alleged FCA Violations by a PPP Borrower and Its CEO,”](#) Mondaq, Jan. 22, 2021
- [“High Court Could Expand FCA Reach In Resolving Circuit Split,”](#) Law360, Dec. 1, 2020
- [From Hospice Care Eligibility to PPP Loan Eligibility – a Potential Supreme Court Decision in the Care Alternatives FCA Case Could Have Wide-Ranging Ramifications,](#) Nov. 20, 2020
- [“Inside The First Paycheck Protection Program Fraud Charges,”](#) Law360, May 15, 2020
- [“SBA Paycheck Protection Program Update: SBA Provides Guidance on Certification of Need and Extends Safe Harbor for Repayment of PPP Loans,”](#) May 14, 2020
- [“SBA Guidance Addresses FCA and FIRREA Liability for PPP Lenders,”](#) May 4, 2020
- [“Mitigating FCA Liability Risks From Covid-19 Relief Programs,”](#) Bloomberg Law, May 2020
- [“An Early Look At DOJ’s Increased Focus On COVID-19 Fraud,”](#) Law360, Apr. 6, 2020
- [“Key Takeaways From DOJ’s 2019 FCA Recovery Stats,”](#) Law360, Mar. 31, 2020
- [“DOJ And States Creatively Respond To Fraud Amid COVID-19,”](#) Law360, Mar. 25, 2020
- [“DOJ’s Civil Division Issues Valuable Guidance on False Claims Act Self-Disclosure, Cooperation, and Remediation Credit,”](#) *Westlaw Journal Government Contract, Volume 33, Issue 4*, Jun. 17, 2019
- [“What Can Be Learned from the DOJ’s 2018 False Claims Act Recoveries?”](#) *Pratt’s Government Contracting Law Report*, Apr. 2019
- [“Inside the DOJ’s New Policy On Coordinated Enforcement,”](#) Law360, May 11, 2018
- [“Cosby’s Conviction And How #MeToo Is Affecting Legal Cases,”](#) Law360, Apr. 26, 2018

- [“Analysis of the DOJ’s Reported \\$3.7 Billion in False Claims Act Recoveries in FY 2017 Reveals Continued Aggressive Use of the False Claims Act by the Government and Qui Tam Relators,”](#) *Pratt’s Government Contracting Law Report*, Apr. 2018
- [“ ‘People v. Weinstein’: New York Attorney General’s Sharp Warning About Systemic Workplace Sexual Harassment,”](#) *New York Law Journal*, Mar. 30, 2018
- [“DOJ’s Criminal Fraud Section Provides Valuable Guidance on the Evaluation of Corporate Compliance Programs,”](#) Mar. 29, 2017
- [“2016 DOJ False Claims Act Statistics Signal that DOJ Will Continue Rigorous Enforcement with a Focus on the Health Care Industry and on Individual Accountability,”](#) *Pratt’s Government Contracting Law Report*, Jan. 13, 2017
- [“Supreme Court Clarifies What Constitutes a ‘Personal Benefit’ for Purposes of Insider Trading,”](#) Dec. 7, 2016
- [“Recent SEC Enforcement Action Highlights General Counsel’s Responsibility for Disclosure of Litigation Contingencies,”](#) Sept. 28, 2016
- [“Supreme Court Addresses Limits on ‘Implied Certification’ Theory Under The False Claims Act: *Universal Health Services, Inc. v. U.S. ex. rel Escobar*,”](#) Jun. 17, 2016
- [“2015 DOJ False Claims Act Statistics Reveal Trend Shifts and Increasing Enforcement for 2016,”](#) *Pratt’s Government Contracting Law Report*, Apr. 2016
- [“9th Cir. Confirms FCA Relator’s Conviction Bars Recovery,”](#) *Law360*, Jul. 28, 2015
- [“Relator Precluded From Sharing in Settlement Proceeds Based on Conviction for Minor Role in Underlying FCA Violation,”](#) Jul. 24, 2015
- [“The Supreme Court Rules on Two Key FCA Issues,”](#) May 29, 2015
- “Selective Waiver: Making Sense of the Confusion,” *New York Law Journal*, Jul. 23, 2007
- “New Risk in Employee Interviews,” *The National Law Journal*, Jul. 24, 2006
- “Shoring Up Compliance Program in the Wake of ‘Booker/Fanfan,’” *GC New York*, Oct. 11, 2005

SPEAKING ENGAGEMENTS

- “FCA Playbook: Managing Risks of COVID-19 Relief and Response Programs,” CLE program, Jun. 24, 2020
- “False Claims Act and *Qui Tam* Litigation: Recent Trends and Developments,” CLE program, Feb. 14, 2017
- “Whistleblower Claims: Latest Developments and Proactive Risk Management,” CLE program, Jun. 7, 2017
- “Internal Investigations 2009 – How to Protect Your Clients or Company,” New York, Practising Law Institute, Jun. 9, 2009
- “Internal Investigations 2008 – Legal, Ethical & Strategic Issues,” New York, Practising Law Institute, Jun. 10, 2008
- “Internal Investigations 2007 – Legal, Ethical & Strategic Issues,” New York, Practising Law Institute, Jun. 12, 2007
- “Ask the Regulators,” New Mexico, Ethics and Compliance Officer Association, Panel Moderator, Apr. 6, 2006
- “The Roles and Responsibilities of In-House and Outside Counsel in Coordinating Multiple Government Investigations and Related Civil Litigations,” New York, Jun. 8, 2005

BLOG

2023 DOJ FCA Enforcement: Expectations for Future

APRIL 8, 2024

BLOG

Come See Us Before We Come See You – DOJ Announces New Whistleblower Program Intensifying Corporate Enforcement Efforts

MARCH 14, 2024

IN THE MEDIA

Suzanne Jaffe Bloom Discusses Record Number of False Claims Act Matters with *Bloomberg Law*

FEBRUARY 23, 2024

RECOGNITIONS

Winston & Strawn Wins Three Law360 Practice Group of the Year Awards

JANUARY 22, 2024

RECOGNITIONS

Winston & Strawn Named Among *Global Investigations Review's* 2023 GIR 100

DECEMBER 5, 2023

RECOGNITIONS

Winston & Strawn Recognized in All Categories of *The Legal 500 Latin America 2024*

OCTOBER 26, 2023

RECOGNITIONS

Winston & Strawn Recognized in 2024 *Benchmark Litigation*

OCTOBER 6, 2023

RECOGNITIONS

Winston & Strawn Partners Recognized in 2024 *Lawdragon 500 Leading Litigators in America*

SEPTEMBER 8, 2023

RECOGNITIONS

Winston Attorneys Recognized in *The Best Lawyers in America*® 2024

AUGUST 17, 2023

RECOGNITIONS

Winston Partners Named to *Benchmark Litigation's* 2023 List of the Top 250 Women in Litigation

AUGUST 3, 2023

BLOG

Understanding SuperValu: Scienter in FCA Claims Hinges on Subjective Beliefs

JUNE 15, 2023

RECOGNITIONS

Capabilities

Government Investigations, Enforcement & Compliance

Government Program Fraud, False Claims Act & Qui Tam Litigation

Compliance Programs

Commercial Litigation & Disputes

Financial Services Transactions & Regulatory

Litigation/Trials

Financial Services

Health Care

Life Sciences

Medical Devices

Technology, Media & Telecommunications

Insurance

Professional Services

Sports