SQUIRE PATTON BOGGS

Colin R. Jennings

Partner

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About Colin

Colin R. Jennings serves as primary outside counsel for global compliance for more than 35 public and privately held global companies. He regularly provides guidance and counseling in connection with his clients' ongoing compliance efforts related to their domestic and international operations, including, when necessary, investigation and defense of compliance-related concerns.

A significant portion of Colin's practice focuses on conducting independent reviews of compliance programs, including the evaluation of each program's structure, operation and performance. He regularly conducts compliance reviews and internal investigations throughout the US and globally. His advice on the design, implementation and assessment of compliance programs is informed by extensive experience not only handling investigations, but also in litigating claims arising from compliance-related matters. Colin regularly presents on global compliance programs, and is the author of numerous articles and chapters on the topic.

Colin has successfully tried numerous civil and criminal matters in various federal and state courts. His active litigation practice focuses on complex civil and criminal matters, including responses to governmental investigations and enforcement actions. As a natural extension of his compliance and litigation practice, Colin has an active data privacy and breach response practice. He regularly interacts with federal, state and international authorities concerning data breaches, and coordinates the forensic analysis, crisis communications and claims or litigation that inevitably follow a breach.

Colin's criminal practice involves representing public and private corporations and business professionals in response to criminal or regulatory investigations. Throughout the US and globally, he conducts internal investigations into allegations of employee misconduct, fraud or other business crimes, including the Foreign Corrupt Practices Act (FCPA), False Claims Act, Economic Espionage Act, OFAC sanctions, money laundering and a variety of cybercrimes.

In addition, Colin has diverse and extensive experience in complex civil litigation arising from matters of fraud, abuse and criminal misconduct. This work includes the regular representation of professional athletes and other high-net-worth individuals who are the victims of fraud and violations of trust. Colin has represented athletes in all major sports leagues, including the NFL, NBA, MLB, NHL, PGA and LPGA.

Experience

Investigations/White Collar Defense/Compliance

- Conducting an internal investigation regarding large-scale falsification of laboratory data and certifications of a global company, and related coordination, analysis and handling of customer, regulatory and damages claims.
- Conducting internal investigations and defense of matters related to potential violations of the Office of Foreign Assets Control (OFAC) sanctions for numerous companies in the Middle East.
- Conducting an independent review of the global compliance program of a Fortune 100 company, and presentation to the board on the operation and effectiveness of the program.
- Special counsel to the state of New Jersey on federal gambling laws related to reorganization of the state lottery system.
- Defending a Foreign Corrupt Practices Act prosecution arising from an oil pipeline project.
- Defending healthcare fraud prosecutions related to alleged kickbacks, billing misconduct and questions regarding medical necessity.
- Assisting a large multinational oil company in connection with its compliance with the USA Patriot Act as a result of its fleet and credit card operations.
- Advising a publicly traded company on its anti-money laundering compliance program related to its precious metals business. This effort included an overall review and implementation of the program and will include related training, including Know Your Customer due diligence requirements and AML risk assessments.
- Conducting internal investigations and defense of matters related to potential violations of the FCPA for numerous companies involving various countries, including Mexico, Russia, China and India.
- Conducting internal investigations related to suspected misappropriation of trade secrets and embezzlement by employees for numerous clients.
- Defending False Claim Act/*qui tam* matters alleging wide-scale fraud in connection with large low-cost housing projects.
- Defending Economic Espionage Act prosecutions and parallel civil litigation.
- Representation of a large publicly traded company in connection with a data breach in Europe and Asia arising from the hacking of employee email accounts, including coordination of the forensic review, assessment of cost recovery, asset recovery in the European Union, and efforts to close fictitious bank accounts and domains in various jurisdictions.
- Coordinating the breach response of a large publicly traded company, including analysis of breach notification obligations for all 50 states.
- Coordinating the breach response for a large publicly traded company resulting from the cyberattack on its consumer-facing websites.
- Conducting internal investigations for various public entities arising from claims of public corruption or embezzlement, and coordinating cooperation with law enforcement and related insurance and other recovery actions.
- Defending large healthcare fraud investigations for publicly traded healthcare companies.
- Defending mortgage fraud investigations and prosecutions in both state and federal court.
- Conducting an internal investigation and defense of a leading environmental services company related to claims of falsification of landfill monitoring data.
- Defending company executives in criminal antitrust investigations into price fixing in the automotive industry, and defense of related civil discovery.

- Defending companies, public sector entities and individuals in numerous grand jury, OIG and other similar investigations and administrative enforcement actions.
- Defending large metropolitan school districts in connection with statewide data manipulation investigation by the State Auditor and Department of Education.

Complex Civil Litigation

- Defending a leading aerospace company against claims of fraud and breach of contract resulting from alleged export law violations.
- Prosecution of claims on behalf of an international telecommunications company arising from the cybersecurity breach and theft of trade secrets.
- Successfully rescinded a stock purchase agreement related to the acquisition of a company that was the subject of a state and federal money laundering investigation.
- Representing a large multinational insurance company in the defense of claims of antitrust and bid rigging.
- Defending several large insurance companies in national class actions asserting claims arising from credit insurance markets, and defending claims of breach of contract and bad faith against various insurers.
- Defending a leading international supplier of pollution control systems for power generation plants against claims of breach of contract.
- Defending criminal investigation and related litigation arising from the collapse of a large Ponzi scheme based upon mortgage-backed securities.
- Prevailing at trial and obtaining a full recovery from the state of California in an action arising from the refusal to reimburse a large healthcare provider for its responses to 911 emergency calls.
- Defending a publicly traded real estate development company in a dispute related to a large-scale mixed-use development in Miami; trial resulted in a favorable verdict for the client.
- Prevailing at trial on claims related to theft and embezzlement by a financial services provider.
- Representing PGA, LPGA, MLB, NBA, NHL and NFL players in connection with actions arising from mismanagement of their assets, investments and finances, and other related representations.

Credentials

Education

- Case Western Reserve University, J.D., 1997
- Allegheny College, B.A., 1994

Admissions

- Ohio, 1997

Courts

- U.S. Ct. of App., Sixth Circuit
- U.S. Dist. Ct., S. Dist. of Ohio
- U.S. Dist. Ct., N. Dist. of Ohio

Memberships & Affiliations

- *Law360* Compliance Editorial Advisory Board
- John M. Manos Inn of Court
- Cleveland Metropolitan Bar Association
- Former chair of the Certified Grievance Committee and served as trial counsel for the CMBA in various lawyer discipline matters
- Former chair and a member of the leadership team for the Criminal Law Section

Recognitions

- Named to the 2026 *Lawdragon 500 Leading Global Investigations Lawyers* guide
- Recognized Practitioner in *Chambers USA* for Litigation – White-Collar Crime & Government Investigations in Ohio 2026
- Recognized in *Lexology Index: Investigations* 2026 – Global Investigation Review
- Named Thomson Reuters Stand-out Lawyer in 2023 and 2026
- "Cleveland-based partner Colin Jennings is representing an automotive manufacturer in an ongoing matter before attorney general offices in all 50 US states and the Canadian data regulator in relation to a data breach that affected customer records of 3.3 million individuals. He also advises dozens of other clients on compliance, regulatory investigations and private litigation, as well as data breach response" -– *Global Data Review 100 2023*
- Recognized Practitioner in *Chambers USA* for Litigation – White-Collar Crime & Government Investigations in Ohio 2023. *Chambers* states he is well regarded for his white-collar criminal defense practice, which includes advising companies on compliance issues, as well as representing clients in government investigations. "He is a top strategic thinker with excellent research skills."
- Recognized Practitioner in *Chambers USA* for Litigation – White-Collar Crime & Government Investigations in Ohio 2022. *Chambers* states he is well regarded for his white-collar criminal defense practice, which includes advising companies on compliance issues as well as representing clients in government investigations. "He's smart, a good writer and a hard worker."
- "He is very experienced in internal investigations and crisis managements, and he's our go-to person in those situations. He is a very practically minded lawyer." – Client Feedback, *Acritas Stars Database*
- Well regarded for his white-collar criminal defense practice, which includes advising companies on compliance issues, as well as representing clients in government investigations. "He is a skilled technician when it comes to internal investigations." – *Chambers USA* 2021
- Recognized in *Best Lawyers* for Commercial Litigation
- Listed in *Ohio Super Lawyers*

Expertise

Services

- Data Privacy, Cybersecurity & Digital Assets
- Government Investigations & White Collar

Industries

- Healthcare
- Sports & Entertainment

Publications & Speaking

- Co-presenter, "Best Practices to Leading Post-Cyber Incident Forensic Investigations and Understanding Litigation Implications Surrounding Forensic Reports", webinar, Federal Bar Association, May 2025

Engagements

- Co-author, "Ethical Artificial Intelligence", *Financier Worldwide*, January 2025
- Co-presenter, "Defending the Privilege of a Forensic Report," webinar, Federal Bar Association, January 2023.
- Co-author, "Reevaluating Organizations' Cybersecurity Needs After Log4j," *Law360*, January 19, 2022.
- Co- author, "4 Considerations In Light Of Cyber Incident Notification Bill," *Law360*, August 9, 2021
- Co-author, "What Private Cos. Can Learn From Biden Cybersecurity Order," *Law360*, May 27, 2021.
- Co-author, "Executive Responsibilities and Consequences: A Case Study of Uber's Data Breaches," *Corporate Compliance Insights*, September 1, 2020.
- Co-author, "COVID-19, the CARES Act and the need for robust compliance," *Financier Worldwide*, July 2020.
- Co-author, "Cyber Breach Forensic Reports: Is Your Report Discoverable?" *Legaltech News*, December 17, 2019.
- Speaker, "Hot Topics in Corporate Compliance," Biennial White Collar Crime Institute, November 2018.
- Co-author, "CMS Proposes Invalidating Adjuster Methodology and Recouping Past Improper Payments From Medicare Advantage Organizations," Squire Patton Boggs Client Alert, November 2018.
- Co-author, "Challenging the DOJ's Accomplice Liability Strategy for Reaching Foreign Conduct in International Bribery Schemes," *PLI Current: White Collar Practice Journal*, November 2018.
- Co-author, "CMS Proposes Invalidating Adjuster Methodology and Recouping Past Improper Payments From Medicare Advantage Organizations," Squire Patton Boggs *Anticorruption Blog*, November 15, 2018.
- Speaker, "Global Compliance Forum: Minimizing Risk to Protect Your Business Interests," Squire Patton Boggs Client Event, October 19, 2018.
- Speaker, "Global Issues Forum: Global Compliance – Best Practices," Association of Corporate Counsel's National Capital Region, September 6, 2018.
- Co-author, "Circuit Rejects Expansive Use of Conspiracy for FCPA," Squire Patton Boggs *Anticorruption Blog*, August 26, 2018.
- Co-author, "DOJ Announces Revised FCPA Corporate Enforcement Policy," Squire Patton Boggs *Anticorruption Blog*, January 25, 2018.
- Speaker, "Global Compliance Forum: Minimizing Risk to Protect Your Business Interests," Squire Patton Boggs Client Event, November 1, 2017.
- Speaker, "Are you ready for a Crisis? Corporate Governance in the Context of Crisis Management," Ohio Chapter Meeting of the Society for Corporate Governance, April 6, 2017.
- Speaker, "White Collar Crime in America and the World: Preventing, Detecting & Remediating Wrongful Conduct," CMBA's Biennial Institute on White Collar Crime, December 9, 2016.
- Speaker, "Ethics in a Corporate and Business Setting," Case Western Reserve Law and Business Fall 2016, November 9, 2016.

- Co-author, "All the Injury Required? How the Supreme Court's Spokeo Decision May Alter the Road for Privacy Litigants," Squire Patton Boggs Client Alert, September 2016.
- Speaker, "2016 US Roundtable for General Counsel in the Chemical and Performance Materials Industry," Squire Patton Boggs Client Alert, April 2016.
- Speaker, "Best Practices for Internal Investigations in 2016," Annual Fraud and Forensics Day, Northeast Ohio Institute of Internal Auditors and Association of Certified Fraud Examiners joint meeting, February 2016.

About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.