



# HFMA/NEHIA

## 2025 Compliance & Internal Audit Conference

Wednesday, December 3 - Friday, December 5, 2025  
Mystic Marriott Hotel, Groton, CT



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# Navigating Through the Evolving Healthcare Enforcement Landscape

HFMA MA-RI – NEHIA Compliance and Internal Audit Conference

December 4, 2025



Life Sciences &  
Healthcare Consulting



## **Today's Objectives:**

During this presentation, we will cover:

1. New faces, new agendas: understand the priorities of new enforcement leaders in DC
2. Examine current and emerging enforcement actions and their impact on healthcare organizations
3. Explore the growing role of state-level enforcement and how it intersects with federal oversight
4. Discuss best practices for managing the risk of civil and criminal liability for health care organizations
5. Discuss lessons learned, practical approaches and best practices to strengthen compliance and internal audit program, informed by recent enforcement cases

## Panel Members



Dhara Satija  
Healthcare Consulting Leader  
Paul Hastings LLP



Lori Dutcher  
Chief Compliance Officer  
Beth Israel Lahey Health



Alber Tenuta  
Special Agent  
FBI



Anna Ferreira-Pandolfi  
HHS-OIG Special Agent /  
Criminal Investigator



Torrey Young  
Partner  
Mukasey Young LLP



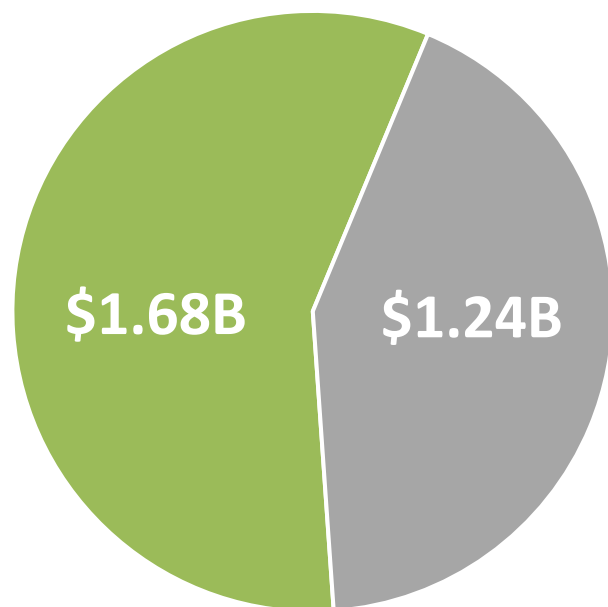
DeNae Thomas  
Of Counsel  
Paul Hastings LLP



## FCA Settlements & Judgments in 2024

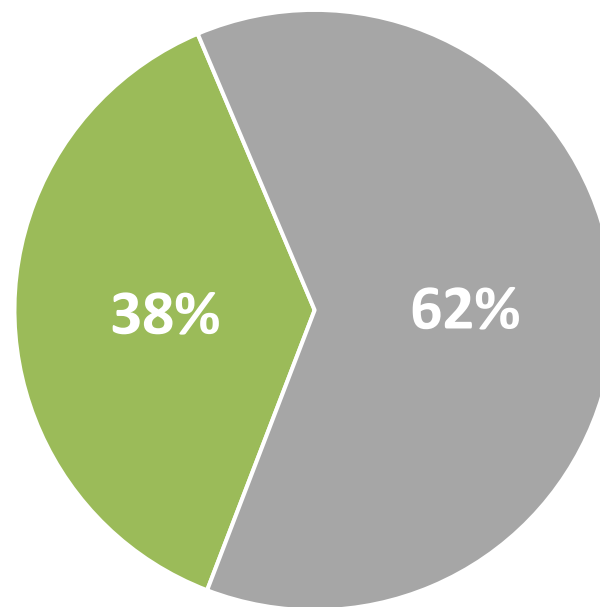
### Settlements and judgments

■ Healthcare ■ Non-Healthcare

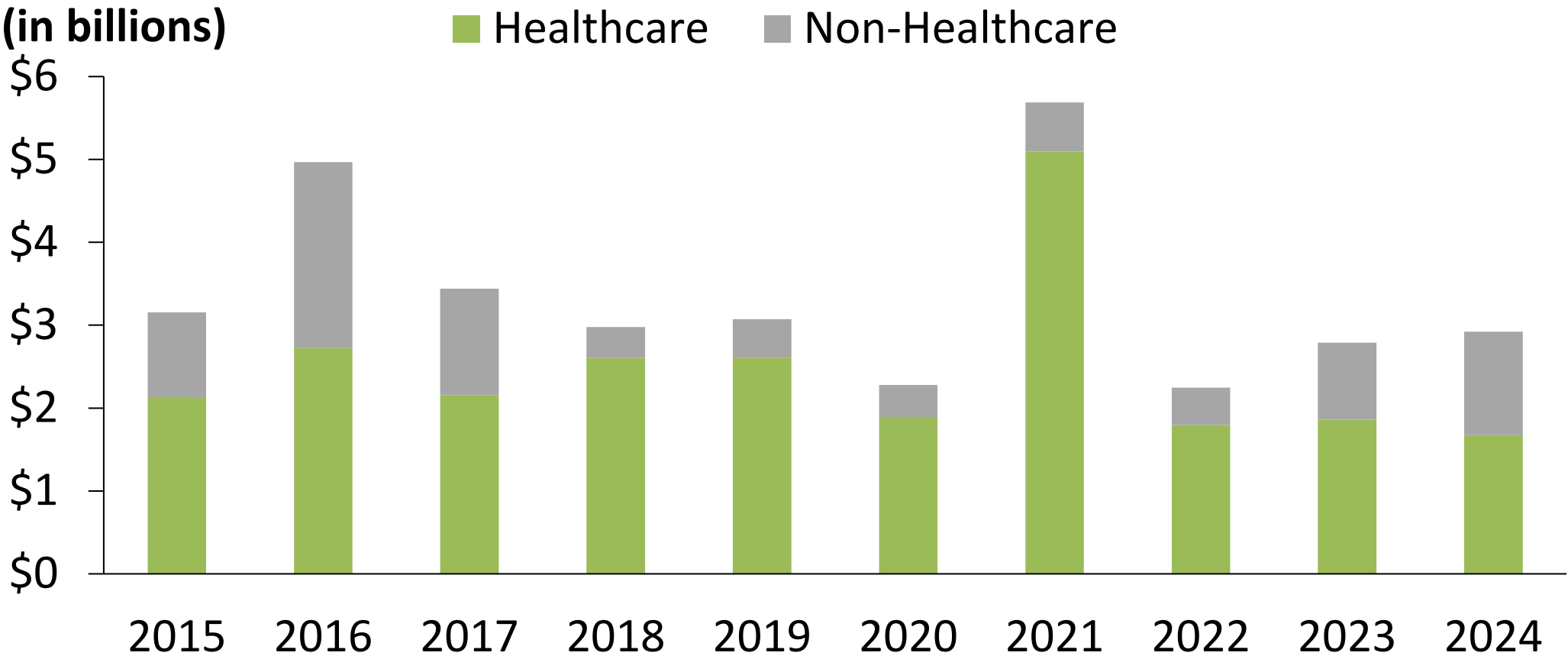


### Qui tam cases filed

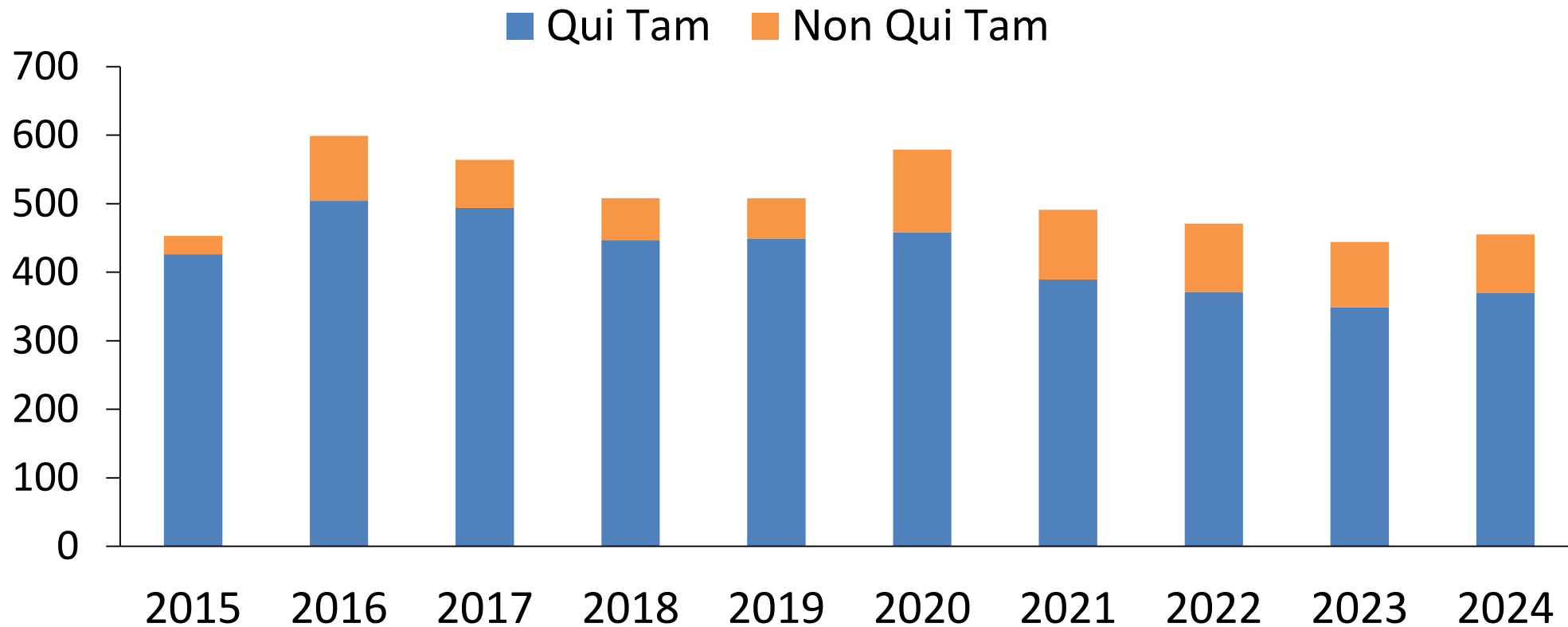
■ Healthcare ■ Non-Healthcare



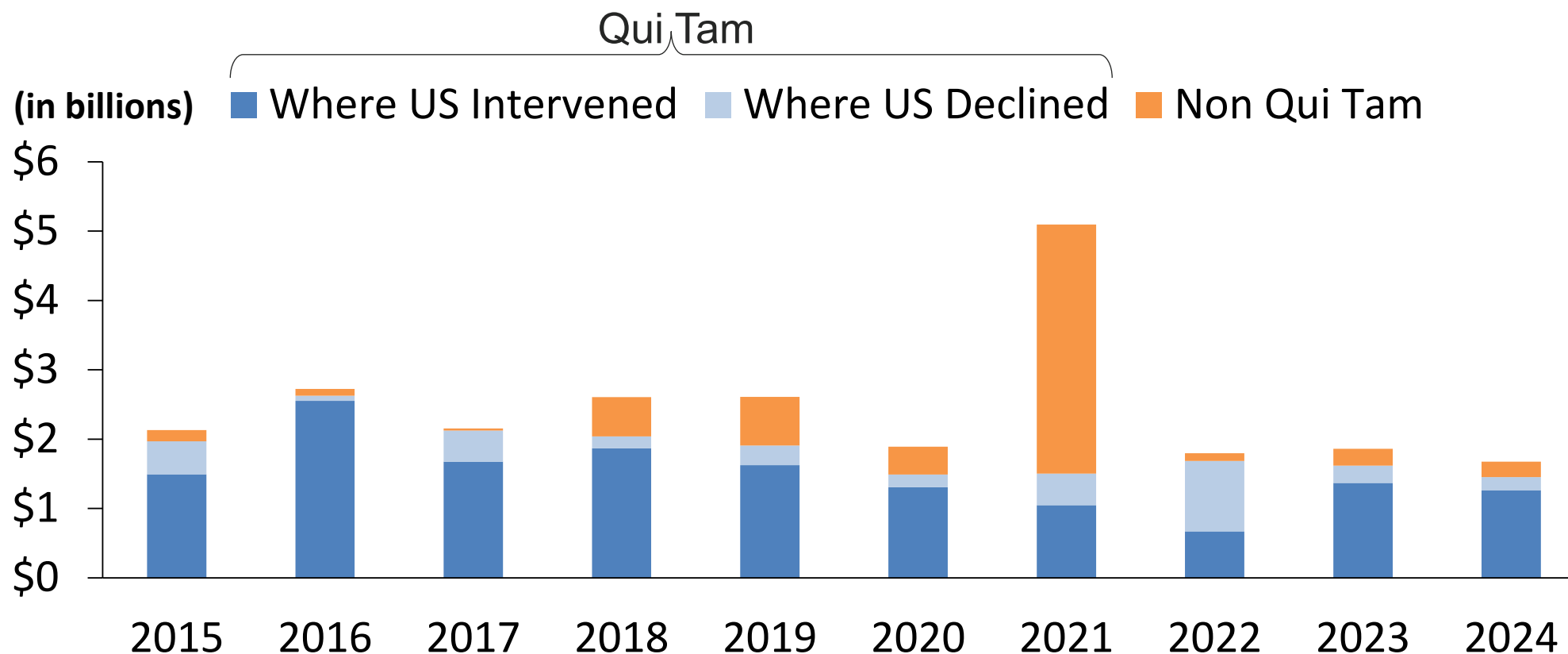
# Healthcare's share of total recoveries was down in 2024



## New healthcare FCA actions coming from relators vs. initiated by the DOJ have been consistent over past 10 years



## Apart from 2021-2022, cases in which the DOJ intervenes continues to be the majority of healthcare recoveries





# Notable DOJ Personnel Changes under President Trump for Healthcare Fraud Enforcement



**Pam Bondi**  
U.S. Attorney  
General

- Replaced Merrick Garland
- Pursued healthcare crimes as a Florida state prosecutor and Florida AG
- Pledged to defend the constitutionality of the FCA's *qui tam* provisions
- Initial memos focus on cartels, immigration, DEI, and human trafficking



**Brett Shumate**  
Civil Division  
Head

- Replaced Brian Boynton
- Served as Deputy Assistant Attorney General for the Civil Division's Federal Programs Branch from 2017-2019 (focused on defending the federal programs, policies, laws, and regulations on behalf of federal agencies, the President, and Cabinet officers)



**Todd Blanche**  
Deputy Attorney  
General

- Replaced Lisa Monaco
- Former personal lawyer to President Trump
- SDNY AUSA enforcement focused on public corruption, securities fraud, RICO, and violent crimes



**Brenna Jenny**  
Deputy AAG for  
Commercial  
Litigation

- Replaced Michael Granston
- Served at HHS-OIG from 2018-2021, including as Principal Deputy General Counsel and CMS Chief Legal Officer
- Commercial litigation houses the Civil Fraud Division, which continues to be overseen by Jamie Yavelberg



**Matthew Galeotti**  
Criminal Division  
Head

- Replaced Nicole Argentieri
- Served as Associate Deputy Attorney General and Deputy Chief of the Business Securities & Fraud Section at EDNY
- Stated priorities include, *inter alia*, Medicare fraud, tariff evasion, and cartels

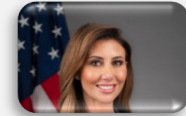
## Notable U.S. Attorneys



**Leah Foley (D. Mass)**  
Replaced Josh Levy



**Jay Clayton (SDNY)**  
Replaced Geoffrey Berman



**Alina Habba (DNJ)**  
Replaced Phillip Seller

# Healthcare Fraud Enforcement and Priorities

“The Criminal Division is intensely committed to rooting out health care fraud schemes and prosecuting the criminals who perpetrate them because these schemes: (1) **often result in physical patient harm through medically unnecessary treatments or failure to provide the correct treatments**; (2) **contribute to our nationwide opioid epidemic and exacerbate controlled substance addiction**; and (3) **do all of that while stealing money hardworking Americans contribute to pay for the care of their elders and other vulnerable citizens**. The Division’s Health Care Fraud Unit and U.S. Attorneys’ Offices stand united with our law enforcement partners in this fight, and we will continue to use every tool at our disposal to protect the integrity of our health care programs for the American people.”

— **Matthew R. Galeotti** (*Head of the Justice Department’s Criminal Division*)



“As part of making healthcare accessible and affordable to all Americans, HHS will **aggressively** work with our law enforcement partners to **eliminate the pervasive health care fraud** that bedeviled this agency under the former administration and drove up costs.”

— **Robert F. Kennedy Jr.** (*Secretary of the Department of Health and Human Services*)

“This record-setting Health Care Fraud Takedown delivers justice to criminal actors who prey upon our most vulnerable citizens and steal from hardworking American taxpayers. Make no mistake – **this administration will not tolerate criminals who line their pockets with taxpayer dollars while endangering the health and safety of our communities.**”

— **Pamela Bondi** (*U.S. Attorney General*)



# DOJ announced the largest health care fraud takedown in history (June 2025)



## Healthcare Criminal Fraud Enforcement in the New Administration

Transnational Criminal Organizations	<b>29</b> defendants were charged for their roles in transnational criminal organizations alleged to have submitted over <b>\$12 billion</b> in fraudulent claims to America's health insurance programs.
Prescription Opioid Trafficking	<b>74</b> defendants, including <b>44 licensed medical professionals</b> , were charged across <b>58 cases</b> in connection with the alleged illegal diversion of <b>over 15 million</b> pills of prescription opioids and other controlled substances.
Telemedicine & Genetic Testing Fraud	<b>49</b> defendants were charged in connection with the submission of over <b>\$1.17 billion</b> in allegedly fraudulent claims to Medicare resulting from telemedicine and genetic testing fraud schemes
Fraudulent Wound Care	<b>7</b> defendants, including <b>five medical professionals</b> , in connection with approximately <b>\$1.1 billion</b> in fraudulent claims to Medicare and other health care benefit programs for amniotic wound allografts.

## DOJ has signaled a greater reliance on data in enforcement actions

- DOJ announced the **Health Care Fraud Data Fusion Center** (June 30, 2025)
  - Brings together experts from DOJ, HHS-OIG, FBI, and other agencies
  - Will leverage **cloud computing**, **artificial intelligence**, and **advanced analytics** to identify emerging health care fraud schemes
- DOJ announced the renewal of the **DOJ-HHS False Claims Act Working Group** (July 2, 2025)
  - Will “maximize cross-agency collaboration to expedite ongoing investigations... and identify new leads, including by leveraging HHS resources through **enhanced data mining** and assessment of HHS and HHS-OIG report findings”



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## PRESENTER BIOS



## Presenter bios

### **Lori Dutcher** **Chief Compliance Officer** **Beth Israel Lahey Health**

As Chief Compliance Officer for Beth Israel Lahey Health, Lori Dutcher works to advance a system-wide culture of compliance and commitment to ethical principles. She and her integrated team serve as strategic partners in managing and mitigating risk across the system. Lori is a seasoned chief compliance and ethics officer with more than 20 years of experience in health care compliance. Before joining Beth Israel Lahey Health, she has served as Senior Vice President for Corporate Compliance and Chief Compliance and Privacy Officer at City of Hope in California. In this role, she oversaw the corporate compliance program for City of Hope National Medical Center, the Beckman Research Institute of the City of Hope and the City of Hope Medical Foundation. Lori has also served as Vice President and Chief Corporate Compliance Officer at Harvard Pilgrim Health Care and as Chief Compliance and Ethics Officer at Tufts Health Plan and in multiple roles in compliance and privacy with Kaiser Permanente in both California and on the East Coast. Lori received her undergraduate degree from the College of St. Rose in Albany, New York, and her law degree from the Western New England College School of Law in Springfield, Massachusetts.

### **Dhara Satija** **Healthcare Consulting** **Leader** **Paul Hastings LLP**

Dhara Satija is a Director in the Paul Hastings Life Sciences Consulting Group where she leads the group's healthcare consulting practice. She has nearly 15 years of consulting experience serving healthcare and life sciences clients across an array of issues, including projects ranging from strategy and operations to regulatory and corporate compliance, risk management, and investigation and litigation support. In particular, Ms. Satija has led projects related to: development and implementation of compliance programs (i.e., written standards, training, and monitoring/auditing); design and delivery of internal compliance audits, investigations, and corrective action plans; compliance and revenue cycle due diligence; support for provider self-disclosures/voluntary refunds; government-initiated audits; litigation support services; and Corporate Integrity Agreement (CIA) requirements.

Dhara is currently serving as President of the Massachusetts-Rhode Island Chapter of Healthcare Financial Management Association (HFMA) for the 2025-2026 term.

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### **DeNae Thomas** **Of Counsel** **Paul Hastings LLP**

DeNae M. Thomas is of counsel in the Litigation Department of Paul Hastings and is based in the firm's New York office. A former federal healthcare prosecutor, DeNae represents corporate entities and their executives in government and internal investigations involving potential violations of healthcare fraud laws, including the federal Anti-Kickback Statute, the False Claims Act, the Controlled Substances Act and other healthcare laws. Prior to joining Paul Hastings, DeNae was an Assistant United States Attorney in the Health Care Fraud Unit of the U.S. Attorney's Office for the District of New Jersey, where she represented the United States in federal court in hundreds of criminal matters. In this role, DeNae led numerous large-scale investigations and prosecutions of doctors, pharmacy and clinical laboratory owners, hospital systems, medical device companies and other individuals and entities involving healthcare fraud, illegal kickback schemes and fraud against government and private health insurance plans, among other violations. DeNae was also previously an Assistant United States Attorney in the Criminal Division of the U.S. Attorney's Office for the Southern District of California. Given her background, DeNae has regularly worked with the various federal agencies tasked with investigating healthcare crimes in the United States, including the U.S. Department of Health and Human Services, the Federal Bureau of Investigation, the U.S. Food and Drug Administration, the U.S. Department of Defense and others.

## Presenter bios

### **Alber Tenuta Special Agent FBI**

Al is a Special Agent with the FBI. He is a Certified Public Accountant and has been with the FBI since 2003. He investigated Public Corruption in the Washington Field Office for 10 years before transferring to human source operations on a Joint Duty Assignment with the Central Intelligence Agency. In 2017 he transferred to the FBI Philadelphia Division as a member of the Healthcare Fraud Task Force. Al specializes in human source operations and undercover evidence gathering related to investigations that focus on national healthcare fraud schemes. Prior to his work with the FBI, he conducted contract compliance audits in the healthcare industry. Al was awarded the 2020 FBI Director's Award for Outstanding Criminal Investigation of the Year for his work on Operation Brace Yourself.

### **Anna Ferreira-Pandolfi HHS-OIG Special Agent / Criminal Investigator**

Anna Ferreira-Pandolfi is a Special Agent with the US Department of Health & Human Services Office of the Inspector General. Anna is assigned to the Philadelphia FBI Health Care Fraud Task Force. She has investigated a wide range of healthcare fraud cases throughout her career including, but not limited to, pill mill and diversion cases, laboratory fraud schemes, and Durable Medical Equipment fraud schemes including the notable Operation Brace Yourself for which she was awarded the 2020 FBI Director's Award for Outstanding Criminal Investigation of the Year. Prior to joining HHS, Anna worked for the City of Philadelphia Office of Inspector General and practiced corporate and business law. She earned a JD and is a member of the Connecticut, Massachusetts, New Jersey, and Pennsylvania bars.

### **Torrey Young Partner Mukasey Young LLP**

Torrey Young defends clients facing civil and criminal government enforcement actions. In the courtroom, she has tried federal jury trials that received national attention relating to false statements, securities, wire, and tax fraud charges. "Torrey is a fantastic trial lawyer. She works incredibly well with clients and co-counsel." She skillfully argues motions, cross-examines fact and expert witnesses, and has been integral to the oral and written advocacy for clients. "Torrey is a tenacious advocate for her clients. She is really creative on cross-examination." In one of the biggest cryptocurrency cases in history, Torrey played a key role at sentencing. She is particularly adept at analyzing data and negotiating loss amounts, restitution, and forfeiture. Her representation of clients in many industries reflects her versatility as a lawyer and problem solver. In the health care and life sciences space, her skills extend to conducting internal investigations, providing Anti-Kickback Statute analyses, implementing compliance programs, advising on Medicare/Medicaid issues, and defending False Claims Act (FCA) claims. Torrey has guided a wide range of health and life science clients, including: individual health care providers and companies, health systems, laboratories, researchers, home health agencies, hospices, nursing homes, assisted living facilities, telehealth companies, marketers, management service companies, pharmacies, and DMEPOS suppliers with issues that extend to the FCA, Stark, AKS, EKRA, EMTALA, and CMP Law.



Thank You