Sharon A. Blinkoff

Counsel

New York Stamford
sharon.blinkoff@troutman.com
D 203.353.6827

Sharon provides guidance on regulatory compliance, product registrations, and complex transactions, backed by years of leadership in the cosmetics and personal care industry, including pivotal roles at major companies and active negotiation with the FDA.

OVERVIEW

Sharon counsels manufacturers, marketers, and distributors within the cosmetics, dietary supplements, over-the-counter drugs, and medical devices sectors. Her clientele spans beauty appliances, consumer products, and luxury goods industries. Clients frequently seek Sharon's guidance on compliance with FDA, CPSC, and FTC regulations, securing FDA registrations, and obtaining 510k premarket clearance for a broad range of medical devices.

Sharon has played an influential role in shaping industry standards. Her leadership extends to her involvement with the Independent Cosmetic Manufacturers and Distributors Trade Association, where she served on the board of directors and contributed to negotiating frameworks for new cosmetic legislation with the FDA.

With previous positions as division and regulatory counsel for Bristol Myers Squibb and senior counsel for Revlon, Sharon's extensive background in regulatory and business matters strengthens her ability to navigate complex legal landscapes. She defends clients in regulatory proceedings before the FDA and the FTC, as well as state attorneys general, and engages in advertising challenges at the NAD and Lanham Act litigations.

Sharon offers strategic guidance in corporate transactions, including acquisitions, divestitures, and public offerings. She also provides dual insight into regulatory issues and intellectual property, offering a holistic approach that aligns legal strategies with business objectives. Sharon's technical knowledge from her early career as a patent attorney enhances her ability to address sophisticated regulatory processes.

REPRESENTATIVE MATTERS

- Successfully cleared several of biomedical devices, including initial aesthetic lasers.
- Successfully assisted a client with legalizing the liposuction claim, a matter pending with the FDA for more than six years.
- Resolved multiple consumer class action cases against a client.
- Helped shepherd a new product of a long-standing client into regulatory compliance.

- Provided clients with guidance to follow under the new cosmetic legislation.
- Advised clients on regulatory issues provided by the new state and federal regulations regarding cannabis products marketed as cosmetics.
- Advised international clients on compliance with FDA laws covering their potential products and imports.
- Advised clients on substantiation for marketing claims and compliance with the FTC's new social media trade regulation law.

TOP AREAS OF FOCUS

- FDA Regulatory + Risk Management Counseling

ALL AREAS OF FOCUS

- Cosmetic and Personal Care Products
- FDA Regulatory + Risk Management Counseling
- Government + Regulatory

PROFESSIONAL/COMMUNITY INVOLVEMENT

- Member, Bar Association of the City of New York
- Member, New York State Bar Association FDA Section
- Member, American Bar Association Consumer Protection Section
- Member, The Society of Cosmetic Chemists
- Member, board of directors and corporate secretary, Independent Cosmetic Manufacturers and Distributors Trade Association

EDUCATION AND CERTIFICATIONS

EDUCATION

- New York University School of Law, LL.M.
- New England School of Law, J.D.
- Rensselaer Polytechnic Institute, B.S., biomedical engineering

BAR ADMISSIONS

- Connecticut
- District of Columbia
- New York

SPEAKING ENGAGEMENTS

- Speaking, "Cannabis Regulatory Update, Current Class Action Suits, Current Legislation and How it Will Affect the Industry," California Chapter of the Society of Cosmetic Chemists May Monthly Meeting, May 24, 2025.

- Panelist, "Overview of the U.S. FDA Regulatory Scheme That Apply to Products Based on Microbiome Technology," 6th Microbiome Movement: Skin Health & Dermatology Summit, September 12-14, 2023.

- Speaker, “MoCRA Educational Webinar,” Professional Beauty Association, August 29, 2023.
- Panelist, “Key Trends in the USA – An Overview,” Cosmetics Regulatory Summit, October 3-4, 2022.
- Speaker, “Cannabis Regulatory Update, Current Class Action Suits, Current Legislation and How it Will Affect the Industry,” Society of Cosmetic Chemists California Chapter Meeting, May 24, 2022.
- Panelist, “Examining Potential Federal Legislation That May Be Game Changers for The Beauty and Personal Care Industry,” 9th Annual Legal, Regulatory and Compliance Forum on Cosmetics & Personal Care Products, May 11, 2022.
- Panelist, “North America’s Cosmetic Framework in US,” Chemical Watch: Global Cosmetic Summit, November 17-18, 2021.
- Panelist, “IBA – Regulatory & Compliance Update,” New York Society of Cosmetic Chemists: Suppliers’ Day 2021, November 10-12, 2021.
- Speaker, “Beauty Within the States: Complying with State Laws and Adhering to Safety Requirements for Cosmetics and Personal Care Products,” 8th Annual Legal, Regulatory and Compliance Forum on Cosmetics & Personal Care Products, March 23, 2021.
- Panelist, “Federal Legislative Update & Small Business Impact,” “Cosmetics 101: Product Safety Testing Basics,” “Cosmetics 102: Claims Basics,” “Advertising Case Studies: Class Actions & NAD Decisions,” Cosmetic Technical Regulatory Forum 2021, February 23, 2021.
- Panelist, “Cannabis: Is the Illegal Hallucinogen of the 60’s the New Biotech Answer,” TKS, March/April 2020.

PUBLICATIONS

- Author, “FTC Adopts ‘Click-to-Cancel’ Amendments to Its Negative Option Rule”, Locke Lord QuickStudy, October 21, 2024.
- Author, “Once Again, the FTC Shows How Serious It Takes False Made in USA Claims With Its $3.7M Fine,” Locke Lord QuickStudy, May 2, 2024.
- Co-author, “FTC Takes Action Against Social Media Posts for Failure to Disclose Material Connections,” Locke Lord QuickStudy, November 20, 2023.
- Author, “FDA Extends Some MoCRA Deadlines,” Locke Lord QuickStudy, November 8, 2023.
- Co-author, “FDA Issues Draft Guidance on Facilities and Product Registration and Listing Under MoCRA,” Locke Lord QuickStudy, August 8, 2023.
- Co-author, “New FTC Endorsement Guides: What Advertisers and Influencers Need to Know,” Locke Lord QuickStudy, July 10, 2023.
- Co-author, “FTC Takes Action Against Amazon for Alleged Deceptive Prime Subscriptions,” Locke Lord QuickStudy, June 28, 2023.
- Co-author, “INFORM Consumers Act Will Attempt to Curb Sale of Counterfeit Goods Online,” Locke Lord QuickStudy, June 26, 2023.
- Co-author, “Amendments to Section VI of the Federal Food and Drug and Cosmetic Act in the Omnibus Bill,” Locke Lord QuickStudy, February 23, 2023.
- Co-author, “New FDA User Fee Bill Contains Rider That Would Permanently Alter FDA’s Regulation of Cosmetics,” Locke Lord QuickStudy, June 10, 2022.
- Co-author, “FTC’s New Rule on Made in USA Labels Precludes Advertisers from False and Misleading Statements About Products’ Origin,” Locke Lord QuickStudy, July 8, 2021.
- Co-author, “FDA Announcement on User Fees for the Over-the-Counter (OTC) Drug Program for FY 2021,” Locke Lord QuickStudy, March 26, 2021.
- Co-author, “Case Closed: Facilities That Manufactured Hand Sanitizers During the Pandemic Will Not Be Charged User Fees,” Locke Lord QuickStudy, January 13, 2021.
- Co-author, “HHS Withdraws FDA’s ‘Arbitrary, Surprise’ OTC User Fee and Proposals for FY 2021,” Locke

Lord QuickStudy, January 11, 2021

- Co-author, “Major Amendment to the Food Drug and Cosmetic Act,” Locke Lord QuickStudy, April 2, 2020.