

## False Claims Act - 2025 Year in Review

---

January 26, 2026 Stacy Brainin, Bill Morrison, John Pachter, Edmund Amorosi, Kathryn Griffin, Andrew Guthrie, Taryn McDonald, Todd Garland, Zachary Prince, Neil Issar, Matthew Liptrot, Wilson Miller, Davis Shugrue, Samara Taper, Connor Madden, Morgan Houghtlin, Brianne Wylie, Mishan Kara, John Tanner, Jesse Cardinal, Michael Maroulis

---

**PRACTICES** False Claims Act and Qui Tam Defense, Healthcare and Life Sciences, Litigation

---

The False Claims Act continues to be one of the most commonly used weapons in the government's enforcement arsenal to address various forms of fraud. This review highlights key developments from 2025 related to the FCA, including:

- The recovery by the government of nearly \$6.9 billion in settlements and judgments in FCA cases in 2025—more than twice the previous fiscal year and the most ever in a single year—and a record-high 1,297 new “*qui tam*” cases filed by whistleblowers (also known as relators)
- The government continuing to prioritize the detection, investigation, and prosecution of fraud related to healthcare services, kickback schemes, cybersecurity requirements for government contractors, and COVID-19 relief programs like the Paycheck Protection Program
- The government beginning to use the FCA as an enforcement tool for customs fraud (that is, evasion of tariffs, smuggling of prohibited goods, and other violations of U.S. trade laws) and against federal funding recipients or contractors that maintain diversity, equity, and inclusion programs
- Continued judicial efforts to interpret the substantive elements of an FCA claim, including what it means for a claim to be “material” and what it takes to plead a claim with particularity under Rule 9(b)'s heightened pleading standard
- Significant judicial decisions regarding the standard the government must meet to dismiss an FCA case, when claims are considered “false,” what it means for a defendant to act “knowingly,” and what it takes to satisfy the various elements of an FCA retaliation claim, among many other issues

In 2025, Haynes Boone represented healthcare providers, defense contractors, and individuals in FCA investigations and lawsuits. We successfully resolved matters before lawsuits were filed, negotiated favorable settlements at all stages, and defended our clients in active litigation and appeals. We also advised many healthcare providers and contractors regarding FCA compliance and other related issues.

[View the False Claims Act - 2025 Year in Review](#)

If you have any questions about the issues covered in this end-of-year review or in our previously published [Mid-Year Update](#), please let us know. We look forward to working with our friends and clients in 2026 and beyond.