

Future FCA Enforcement Expectations in Light of Record-Breaking FY 2025 Recoveries and Administration Priorities

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The annual False Claims Act (FCA) recovery statistics issued by the U.S. Department of Justice (DOJ) for Fiscal Year 2025 represent the highest single-year recovery in FCA history, underscoring that the FCA remains one of the government's most effective tools for combating frauds involving federal funds. The following article discusses expectations for FCA enforcement in 2026 and beyond based on an analysis of FY 2025 FCA activity and the priorities and goals of the current administration.

I. SUMMARY OF FY 2025 FCA ENFORCEMENT ACTIVITY

FCA Recoveries via Settlements and Judgments

The \$6.89 billion recovered in FY 2025 in settlements and judgments represents the highest single-year recovery in the history of the FCA—surpassing the previous record of \$6.16 billion set in FY 2014.^[1] This record-breaking total marks the 17th consecutive year in which FCA recoveries exceeded \$2 billion—and the first year to exceed \$6 billion since 2014.^[2] Notably, the current administration's shifting priorities did not derail the existing pipeline of FCA matters, making the \$6.89 billion in recoveries all the more impressive. The amount recovered in FY 2025 brings the total recovered since Congress substantially strengthened the FCA in 1986 to more than \$85.65 billion.^[3]

Notably, these results—which were driven largely by suits filed prior to the current administration—have been fully embraced by this administration. In emphasizing the significance of these results, Deputy Attorney General Todd Blanche made clear that vigorous FCA enforcement will be a priority of this administration: “Stopping rampant fraud is a top priority, and this record-breaking year proves the False Claims Act remains one of the government's most powerful weapons against fraud.”^[4] Assistant Attorney General Brett A. Shumate of DOJ's Civil Division echoed these sentiments, noting that “[t]he achievements announced today reflect exemplary work by the Department's dedicated employees to investigate and litigate cases involving fraud against the government and to ensure that America's taxpayer dollars are used for their intended purpose.”^[5] This commitment from DOJ leadership strongly suggests that we will continue to see this trend of record-setting FCA recoveries as well as numbers of FCA cases being filed (as discussed below). Moreover, the current administration's embrace of the historic FY 2025 recoveries underscores the bipartisan nature of the FCA—particularly in light of the curtailment of enforcement in other areas.

Another Record Number of FCA Matters Initiated and DOJ's Continuing Reliance on Whistleblowers

FY 2025 marked the largest number of new FCA matters commenced in a single year in the history of the statute. [6] The 1,698 new matters (including government-initiated investigations and *qui tam* actions) represent a nearly 21% increase over FY 2024's then-record of 1,405 new matters. [7] That also makes four record-setting years in a row. [8] Notably, in FY 2025, this increase was driven exclusively by *qui tam* matters—1,297—filed under the FCA's whistleblower provisions, which allow individual whistleblowers or *relators* to file lawsuits alleging false claims on behalf of the government and share in any recovery, as government-initiated cases decreased slightly from FY 2024 to FY 2025. [9]

The recent trend of substantial year-over-year increases in *qui tam* matters is what one would expect to see with a plaintiff's bar that is growing in size and sophistication with respect to identifying and filing *qui tam* suits. And it is not just that they are filing more suits; the plaintiff's bar has established that it can successfully litigate these suits *whether the government intervenes or not*. As is typical, the bulk of the recoveries in FY 2025 were from *qui tam* matters. It is particularly notable that the recoveries in cases in which the government declined to intervene exceeded \$2 billion, nearly doubling the next-highest year for such recoveries. [10]

Relators' shares of awards totaled approximately \$330 million in FY 2025, a decrease from the \$479 million awarded in FY 2024, and the second lowest in 15 years. [11] DOJ did not explain the 31% decrease in relator awards in its press release, but delayed payouts due to appeals of the underlying judgments or lower payouts from resolutions of pandemic-era fraud could be contributing factors. Nonetheless, the 6% share in total recoveries received by relators in 2025 is unlikely to deter whistleblowers and their attorneys from coming forward and reporting fraud related to government programs, particularly given the administration's full-throated commitment to ferreting out government waste, fraud, and abuse. [12]

Healthcare Industry

Buoyed by several high-value resolutions, the healthcare industry remained the dominant focus of FCA enforcement in FY 2025, with recoveries totaling approximately \$5.72 billion—representing over 83% of total FCA recoveries for the fiscal year. [13]

There were 641 new healthcare matters initiated in FY 2025 (compared to 457 in FY 2024), of which 458 were new *qui tam* matters. [14] As in past years, the FCA was used to pursue matters involving a wide array of participants in the healthcare field. According to DOJ, the recoveries in those cases “restore funds” to federal programs such as Medicare, Medicaid, and TRICARE. [15] The amounts included in the \$5.72 billion recovery figure reflect only alleged federal losses; in many cases, DOJ had a role in obtaining additional amounts for state Medicaid programs. [16]

DOJ continued and expanded its success in several major healthcare enforcement areas: prescription drugs, Managed Care, and medically unnecessary care. [17] For example, the country's largest long-term-care pharmacy provider and its parent company were found liable by a unanimous jury for dispensing drugs without valid prescriptions to elderly and disabled individuals in assisted-living and long-term-care facilities. [18] The court entered a substantial \$948 million judgment, which included both penalties and treble damages. [19] Another pharmaceutical company agreed to a payment of \$425 million (with no admission of liability) to resolve allegations that its use of a specialty pharmacy that interacted with two independent co-pay assistance foundations circumvented the spirit of the Office of the Inspector General's guidance relating to the distribution of its charitable donations for Medicare patients taking multiple sclerosis therapies. [20] This was the latest settlement in a number of enforcement actions against pharmaceutical companies that allegedly violated the FCA through their charitable payments to independent co-pay assistance foundations.

In the Managed Care space, a healthcare organization paid up to \$98 million to resolve claimed FCA violations stemming from allegations that the organization knowingly submitted, or caused the submission of, diagnosis codes for Medicare Advantage enrollees that were not supported by the beneficiaries' medical records. [21] The alleged submission of invalid codes resulted in increased payments to the organization. [22] Similarly, another medical group paid close to \$60 million to resolve allegations of causing the submission of false diagnosis codes for spinal conditions to receive increased payments from Medicare. [23] The radiology group that allegedly created false radiology reports to support the diagnoses agreed to pay an additional \$2.35 million. [24]

In the area of medically unnecessary care, DOJ procured a \$45 million settlement against one of the nation’s largest providers of bedside specialty wound care for patients in nursing homes and nursing facilities.^[25] The wound-care management group was alleged to have knowingly caused the submission of claims to Medicare for medically unnecessary surgeries that were more lucrative than the routine wound management care that had been performed.^[26] Further, the government alleged that the group provided financial incentives for physicians to perform certain procedures during as many visits as possible, regardless of the patients’ needs.^[27] As part of the settlement, the wound-care management group will enter into a five-year Corporate Integrity Agreement with the Office of Inspector General for the Department of Health and Human Services, in which it must develop and maintain a compliance program and risk assessment process, as well as hire an independent review organization to oversee claims and health information technology systems.^[28]

Defense Industry

The notable decline we witnessed in FY 2024 in recoveries based on alleged procurement fraud within the defense industry more than reversed itself in FY 2025. With \$634 million recovered in connection with fraud within the defense industry, FY 2025 had the second-highest amount of such recoveries over the last 20 years. It is notable that the relatively large recoveries in FY 2023 and FY 2025 were primarily the product of two resolutions that each netted hundreds of millions in recoveries; excluding these mega-recoveries, one can see a sustained and substantial pace of recoveries in this sector, *and* the fact that there were two such large recoveries in the last three years suggests that there may be a new reality of such recoveries occurring from companies within the defense industry.

The significant settlement in FY 2025 was a \$428 million settlement with an aerospace and defense contractor—the second-largest FCA procurement recovery ever—that DOJ announced at the outset of FY 2025.^[29] The contractor agreed to pay this landmark settlement after admitting it knowingly failed to provide truthful verified cost and pricing data during negotiations of government contracts between 2009 and 2020.^[30] The contractor admitted to failing to disclose cost and pricing information on labor and material costs to supply weapons to the Department of Defense in violation of the Truth in Negotiations Act.

DOJ emphasized that “[f]raud on the military squanders government funds, can deprive service members of critical resources and potentially put them at risk, and creates potential national security risks.”^[31] There were also 66 new defense-related FCA matters initiated in FY 2025, a slight increase over the 59 commenced in FY 2024.^[32]

Other Activities and Industries Targeted

Recoveries from industries other than healthcare and defense totaled approximately \$533 million in FY 2025, a decrease from FY 2024’s \$1.23 billion recovered.^[33] When looking at the last 10 years of recoveries, though, the amount recovered in FY 2024 is an outlier. Indeed, the FY 2025 recovery in this category is the third-highest recovery in this category over the last 10 years, and there were 991 new matters initiated in other industries in FY 2025 (193 *non-qui tam* and 798 *qui tam*), compared to 889 in FY 2024.

Collectively, this data reflects a continued expansion of FCA enforcement beyond the traditional healthcare and defense sectors, strongly suggesting that there will continue to be robust FCA enforcement outside of the record-setting activity in the healthcare and defense procurement sectors.^[34]

Trade Fraud and Tariff Evasion

A significant new development in FY 2025 was the launch of a cross-agency Trade Fraud Task Force to enhance efforts to prevent trade fraud that deprives the government of vital revenues, threatens critical domestic industries, undermines consumer confidence, and weakens national security.^[35] These matters focus on those who attempt to misrepresent the types of goods imported, to misrepresent an item’s country of origin, or to disguise items to evade duties.

In May 2025, DOJ signaled that it would prioritize enforcement of international-trade and customs fraud, including tariff evasion.^[36] As previewed last year, this initiative reflects the current administration’s focus on international trade and tariffs, which signals that the FCA may be increasingly used to combat customs fraud and tariff evasion.^[37] For example, on July 23, 2025, DOJ announced a \$6.8 million settlement with a plastic-resin importer to resolve

allegations that the company violated the FCA by knowingly failing to pay customs duties on certain plastic resin from China.^[38] Because importing merchandise into the United States requires making certifications to the government, tariff and customs-duty noncompliance may expose companies and individuals to increased FCA liability.

Cybersecurity Compliance

DOJ's Civil Cyber-Fraud Initiative—launched in October 2021 to “utilize the [FCA] to pursue cybersecurity related fraud by government contractors and grant recipients”^[39]—remained active in FY 2025, signaling that DOJ will continue to use the FCA to promote cybersecurity compliance by government contractors and grant recipients who knowingly violate applicable cybersecurity requirements.^[40]

For example, on September 30, 2025, DOJ secured an \$875,000 FCA settlement from a research corporation to resolve allegations that it failed to meet cybersecurity requirements in contracts with the Department of the Air Force and the Defense Advanced Research Projects Agency.^[41]

Pandemic Relief Programs

DOJ's COVID-19 Fraud Enforcement Task Force continued to aggressively pursue FCA claims related to fraud targeting pandemic-relief programs. DOJ's enforcement in this area has included pursuit of cases involving payments under the Paycheck Protection Program administered by the U.S. Small Business Administration, as well as alleged fraud affecting Medicare and other federal healthcare programs for services related to COVID-19 testing and treatment.^[42] In FY 2025, there were more than 200 resolutions of fraud claims relating to pandemic-relief programs leading to over \$230 million in recoveries.

The Value of Self-Disclosure and Cooperation Credit

DOJ remained committed in FY 2025 to incentivizing and rewarding entities and individuals that self-disclose misconduct, cooperate in the course of an investigation, and implement effective remedial measures.^[43] For instance, a defense contractor and a private equity company were able to limit their exposure to \$1.75 million to resolve their liability for knowingly failing to comply with cybersecurity requirements in contracts with the Department of the Air Force,^[44] with DOJ specifically acknowledging that the two companies made multiple timely self-disclosures, cooperated with the investigation, and took immediate action to remedy wrongdoing.^[45] This focus on incentivizing and rewarding self-disclosure is expected to continue throughout FY 2026. Indeed, as recently as March 10, 2026, DOJ announced a new department-wide “Corporate Enforcement and Voluntary Self-Disclosure Policy” providing for declinations and other forms of leniency depending on, among other things, the timing, nature, and extent of corporate self-reporting and remediation.^[46]

II. FCA ENFORCEMENT FORECAST FOR 2026 AND BEYOND

If past is prologue, the year ahead will undoubtedly be marked by continued significant FCA enforcement activity with the potential for new reporting records to be set. Given various pronouncements and initiatives by the new administration, it appears likely that we will see in FY 2026 an increasing use of the FCA to implement this administration's priorities and missions. In terms of legal developments, one of the most significant in FY 2026 will be the ongoing legal challenges to the FCA's *qui tam* provisions.^[47]

Use of the FCA for Advancing Certain Priorities of the Current Administration

Eliminating Waste, Fraud, and Abuse in Government Programs and Spending

The Trump administration has made clear its intention to focus on controlling “wasteful spending” and “bring[ing] accountability and transparency to federal spending, ensuring taxpayer dollars are spent wisely and effectively.”^[48] In February 2025, the administration directed federal agencies to provide justification for each payment of certain government contracts and grants, review existing contracts and grants, and build a centralized technological record of payments under those contracts and grants.^[49] In March 2025, it directed federal agencies to remove “unnecessary barriers” that prevent federal employees from having access to government data, to enhance the government's “ability to detect overpayments and fraud.”^[50] Then in June 2025, the administration issued a memorandum on

eliminating “waste, fraud, and abuse” in Medicaid, citing “rapidly accelerated” state-directed payments on a trajectory that “threatens” the long-term stability of Medicaid and the Treasury.^[51]

Given that the FCA is one of the most powerful tools for combating fraud in government programs and recovering government funds obtained via fraud, along with offering the possibility of securing treble damages and substantial penalties, one should expect that the administration will continue to employ the FCA aggressively to pursue one of its primary missions of uncovering and punishing government waste, fraud, and abuse. One ripe area for significant recoveries of federal funds is in connection with various pandemic-relief programs,^[52] which suggests that we will continue to see the FCA used to pursue those who obtained or provided access to pandemic-relief funds based on fraud.^[53]

Eliminating “Unlawful” DEI

The current administration has stated its intent to rely on the FCA to target what it has described as unlawful diversity, equity, and inclusion (DEI) programs.^[54] President Trump’s January 21, 2025 executive order, titled “Ending Illegal Discrimination and Restoring Merit-Based Opportunity,” mandated two new terms in all future federal contracts and grants. First, each agency head now requires federal contractors and grant recipients to agree that “[their] compliance in all respects with all applicable Federal anti-discrimination laws is material to the government’s payment decisions for purposes of” the FCA.^[55] Second, federal contractors and grant recipients must also certify that they do “not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.”^[56]

Implicitly certifying compliance with these provisions potentially exposes federal contractors and grant recipients to FCA liability *if* they are found to maintain DEI programs that violate federal antidiscrimination laws. In May 2025, DOJ announced the Civil Rights Fraud Initiative, which was intended to use the FCA as an investigative tool to bring claims against recipients of federal funds that knowingly violated these executive orders.^[57] We expect to see significant investigative activity in this space. Given that a DEI program would have to violate federal antidiscrimination laws to be actionable under the FCA, though, it is an open question as to how many, if any, such suits we will actually see filed in FY 2026.

Legal Challenge to FCA’s Whistleblower Provisions

Perhaps the most consequential issue to be litigated in recent memory in FCA jurisprudence is the ongoing legal challenge to the FCA’s *qui tam* provisions. The Florida federal court’s decision in 2024 in *Zafirov v. Florida Medical Associates, LLC*, holding that the FCA’s *qui tam* provisions are unconstitutional, is currently on appeal, and the Eleventh Circuit held oral argument in December 2025.^[58] In *Zafirov*, the court reasoned that *qui tam* relators exercise significant authority to initiate enforcement actions and litigation, conduct discovery, and negotiate settlements as “officers of the United States,” without proper appointment.^[59]

If the Eleventh Circuit ultimately upholds the district court’s finding that the *qui tam* provisions violate the Appointments Clause of the U.S. Constitution, the resulting circuit split will likely end up before the U.S. Supreme Court. In *United States ex rel. Polansky v. Executive Health Resources, Inc.*, a recent FCA case before the Court, Justice Thomas argued in his dissent that the *qui tam* provision is in tension with Article II of the Constitution.^[60] Similar to the court in *Zafirov*, he asserted that the provision is an improper exercise of executive power, which belongs solely to the Executive Branch.^[61]

III. KEY TAKEAWAYS

First, given the record-breaking \$6.89 billion in recoveries from FCA matters in FY 2025—the highest in the statute’s history—DOJ’s rate of FCA enforcement shows no signs of slowing down as the government’s primary tool to combat fraud targeting government funds. Indeed, Deputy Assistant Attorney General Brenna Jenny emphasized that “[t]he Department’s False Claims Act enforcement is guided by a simple principle: the statute is a powerful tool, and it should be used responsibly. The record-breaking recoveries announced today show our commitment to holding bad actors accountable, safeguarding taxpayer dollars, and protecting vulnerable populations.”^[62]

Second, we can expect an uptick in FCA investigations and related actions aimed at recovering government funds obtained via fraud targeting a wide range of government programs—including pandemic-relief programs, Medicare,

and other federal grant, subsidy, and procurement programs—particularly given the administration’s stated focus on ferreting out fraud, waste, and abuse in government spending.

Third, the FCA is likely to be used to carry out various administration priorities and objectives—including those related to the elimination of unlawful DEI, promoting cybersecurity compliance, and overseeing international trade and tariffs.

Fourth, despite the pending legal challenge to the FCA’s *qui tam* provisions, the fact that a record 1,297 *qui tam* actions were filed in FY 2025 suggests that relators will continue to play a leading role in combating fraud and will likely continue to litigate their claims even when the government declines to intervene. Indeed, given that approximately 78% of FY 2025 recoveries resulted from *qui tam* actions, whistleblowers and their counsel are likely to be motivated to continue bringing FCA claims by the prospect of securing significant dollar amounts as a share of the government’s recoveries. Whistleblowers and their counsel may also be motivated to bring FCA claims by the administration’s focus on efforts to identify and eliminate waste, fraud, and abuse in government spending.

Fifth, organizations should take note of DOJ’s continued commitment to rewarding self-disclosure and cooperation. Entities that identify potential FCA issues should carefully evaluate whether self-disclosure may be appropriate, as the benefits may include reduced penalties, lower damage multiples, and more-favorable settlement terms.

If you have any questions about this subject or related subjects, or if you need assistance, please contact the authors of this article, [Suzanne Jaffe Bloom](#) (Partner and Co-Chair, White Collar & Government Investigations), [Matt Graves](#) (Partner, White Collar & Government Investigations), [Amandeep Sidhu](#) (Partner, White Collar & Government Investigations), [Benjamin Sokoly](#) (Of Counsel, White Collar & Government Investigations), [Christopher Parker](#) (Associate, White Collar & Government Investigations), [Sydney Hartman](#) (Associate, General Litigation), or your Winston & Strawn relationship attorney. You can also visit our [White Collar & Government Investigations practice page](#) and our [Government Program Fraud, False Claims Act & Qui Tam Litigation practice page](#). For additional thought leadership on this and related topics, please visit [Investigations, Enforcement, & Compliance Alerts](#) and our [False Claims Act Playbook](#).

[1] See DOJ Press Release, False Claims Act Settlements and Judgments Exceed \$2.9B in Fiscal Year 2024 (Jan. 15, 2025), <https://www.justice.gov/opa/pr/false-claims-act-settlements-and-judgments-exceed-29b-fiscal-year-2024>; see also DOJ, Fraud Statistics – Overview, October 1, 1986 – September 30, 2025, <https://www.justice.gov/opa/media/1424121/dl> (2025 DOJ Fraud Statistics); DOJ Press Release, False Claims Act Settlements and Judgments Exceed \$6.8B in Fiscal Year 2025 (Jan. 16, 2026), <https://www.justice.gov/opa/pr/false-claims-act-settlements-and-judgments-exceed-68b-fiscal-year-2025> (2025 FCA Recoveries Press Release).

[2] See 2025 DOJ Fraud Statistics.

[3] *Id.*

[4] See 2025 FCA Recoveries Press Release.

[5] *Id.*

[6] *Id.*

[7] See 2025 DOJ Fraud Statistics; see also Winston & Strawn Blog, *Future FCA Enforcement Expectations in Light of New Administrative Priorities and 2024 Recoveries* (May 1, 2025), <https://www.winston.com/en/blogs-and-podcasts/government-program-fraud-false-claims-act-and-qui-tam-litigation-playbook/future-fca-enforcement-expectations-in-light-of-new-administration-priorities-and-2024-recoveries> (Winston & Strawn Blog, *Future FCA Enforcement Expectations in Light of New Administrative Priorities and 2024 Recoveries*).

[8] See 2025 DOJ Fraud Statistics.

[9] See 2025 FCA Recoveries Press Release; 2025 DOJ Fraud Statistics.

[10] *Id.*

[11] *Id.*

[12] *Id.*

[13] See 2025 FCA Recoveries Press Release; see *also* 2025 DOJ Fraud Statistics.

[14] See 2025 DOJ Fraud Statistics.

[15] See 2025 FCA Recoveries Press Release.

[16] *Id.*

[17] *Id.*

[18] See DOJ Fact Sheet, False Claims Act Settlements and Judgments FY2025, <https://www.justice.gov/opa/media/1424126/dl>. (2025 DOJ Fact Sheet).

[19] *Id.*

[20] *Id.*

[21] See DOJ Press Release, Medicare Advantage Provider Independent Health to Pay up to \$98M to Settle False Claims Act Suit (Dec. 20, 2024), <https://www.justice.gov/archives/opa/pr/medicare-advantage-provider-independent-health-pay-98m-settle-false-claims-act-suit>.

[22] *Id.*

[23] See DOJ Press Release, Medicare Advantage Provider Seoul Medical Group and Related Parties to Pay over \$62M to Settle False Claims Act Suit (Mar. 26, 2025), <https://www.justice.gov/opa/pr/medicare-advantage-provider-seoul-medical-group-and-related-parties-pay-over-62m-settle>.

[24] See 2025 DOJ Fact Sheet.

[25] See DOJ Press Release, Vohra Wound Physicians and Its Owner Agree to Pay \$45M to Settle Fraud Allegations of Overbilling for Wound Care Services (Nov. 21, 2025), <https://www.justice.gov/opa/pr/vohra-wound-physicians-and-its-owner-agree-pay-45m-settle-fraud-allegations-overbilling>.

[26] *Id.*

[27] *Id.*

[28] *Id.*

[29] *Id.*

[30] See DOJ Press Release, Raytheon Company to Pay over \$950M in Connection with Defective Pricing, Foreign Bribery, and Export Control Schemes (Oct. 16, 2024), <https://www.justice.gov/archives/opa/pr/raytheon-company-pay-over-950m-connection-defective-pricing-foreign-bribery-and-export>.

[31] See 2025 FCA Recoveries Press Release.

[32] See 2025 DOJ Fraud Statistics.

[33] *Id.*

[34] *Id.*

[35] See 2025 FCA Recoveries Press Release.

[36] See DOJ Memorandum, Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime (May 12, 2025), <https://www.justice.gov/opa/media/1400141/dl?inline>.

[37] See Winston & Strawn Blog, *Future FCA Enforcement Expectations in Light of New Administrative Priorities and 2024 Recoveries* (May 1, 2025), <https://www.winston.com/en/blogs-and-podcasts/government-program-fraud-false-claims-act-and-qui-tam-litigation-playbook/future-fca-enforcement-expectations-in-light-of-new-administration-priorities-and-2024-recoveries>.

[38] See DOJ Press Release, Importers Agree to Pay \$6.8M to Resolve False Claims Act Liability Relating to Voluntary Self-Disclosure of Unpaid Customs Duties (July 23, 2025), <https://www.justice.gov/opa/pr/importers-agree-pay-68m-resolve-false-claims-act-liability-relating-voluntary-self>.

[39] DOJ Press Release, Deputy Attorney General Lisa O. Monaco Announces New Civil Cyber-Fraud Initiative (Oct. 6, 2021), <https://www.justice.gov/archives/opa/pr/deputy-attorney-general-lisa-o-monaco-announces-new-civil-cyber-fraud-initiative>; Winston & Strawn Blog, *DOJ Launches Civil Cyber-Fraud Initiative to Use False Claims Act to Enforce Federal Contractors' Cyber Security Requirements* (Nov. 2, 2021), <https://www.winston.com/en/blogs-and-podcasts/government-program-fraud-false-claims-act-and-qui-tam-litigation-playbook/doj-launches-civil-cyber-fraud-initiative-to-use-false-claims-act-to-enforce-federal-contractors-cyber-security-requirements>.

[40] See 2025 FCA Recoveries Press Release.

[41] See DOJ Press Release, Georgia Tech Research Corporation Agrees to Pay \$875,000 to Resolve Civil Cyber-Fraud Litigation, (Sep. 30, 2025), <https://www.justice.gov/opa/pr/georgia-tech-research-corporation-agrees-pay-875000-resolve-civil-cyber-fraud-litigation>.

[42] See 2025 DOJ Fact Sheet; Winston & Strawn Blog, *DOJ Continues False Claims Act Enforcement of PPP Loans Into 2026* (Mar. 2, 2026), <https://www.winston.com/en/blogs-and-podcasts/government-program-fraud-false-claims-act-and-qui-tam-litigation-playbook/doj-continues-false-claims-act-enforcement-of-ppp-loans-into-2026>.

[43] See 2025 FCA Recoveries Press Release.

[44] See DOJ Press Release, California Defense Contractor and Private Equity Firm Agree to Pay \$1.7M to Resolve False Claims Act Liability Relating to Voluntary Self-Disclosure of Cybersecurity Violations (July 31, 2025), <https://www.justice.gov/opa/pr/california-defense-contractor-and-private-equity-firm-agree-pay-175m-resolve-false-claims>.

[45] *Id.*

[46] See Winston & Strawn Blog, *DOJ Launches New Department-Wide Corporate Enforcement Policy: What Companies Need to Know* (Mar. 18, 2026), <https://www.winston.com/en/blogs-and-podcasts/investigations-enforcement-and-compliance-alerts/doj-launches-groundbreaking-department-wide-corporate-enforcement-policy-what-companies-need-to-know>.

[47] See Winston & Strawn Blog, *Future FCA Enforcement Expectations in Light of New Administrative Priorities and 2024 Recoveries*.

[48] See *id.*

[49] Exec. Order No. 14222, 90 Fed. Reg. 11095 (Feb. 26, 2025).

[50] Exec. Order No. 14243, 90 Fed. Reg. 13681 (Mar. 20, 2025).

[51] Memorandum on Eliminating Waste, Fraud, and Abuse in Medicaid (June 6, 2025), <https://www.whitehouse.gov/presidential-actions/2025/06/eliminating-waste-fraud-and-abuse-in-medicaid/>.

[52] See Winston & Strawn Blog, *DOJ Continues False Claims Act Enforcement of PPP Loans Into 2026* (Mar. 2, 2026), <https://www.winston.com/en/blogs-and-podcasts/government-program-fraud-false-claims-act-and-qui-tam-litigation-playbook/doj-continues-false-claims-act-enforcement-of-ppp-loans-into-2026>.

[53] See 2025 FCA Recoveries Press Release.

[54] Exec. Order No. 14173, 90 Fed. Reg. 8633 (Jan. 21, 2025); Winston & Strawn Blog, *Navigating DEI Under the Trump Administration: Key Considerations for Employers* (Feb. 28, 2025), <https://www.winston.com/en/insights-news/navigating-dei-under-the-trump-administration-key-considerations-for-employers>.

[55] *Id.* § 3(b)(iv)(A).

[56] *Id.* § 3(b)(iv)(B).

[57] See DOJ Press Release, Justice Department Establishes Civil Rights Fraud Initiative, <https://www.justice.gov/opa/pr/justice-department-establishes-civil-rights-fraud-initiative>; Winston & Strawn Blog, *DOJ Announces Civil Rights Fraud Initiative Signaling Heightened Risk of FCA Exposure for Federal Fund Recipients Based on Alleged Unlawful Discrimination* (May 22, 2025), <https://www.winston.com/en/blogs-and-podcasts/government-program-fraud-false-claims-act-and-qui-tam-litigation-playbook/doj-announces-expanded-use-of-the-false-claims-act-targeting-alleged-unlawful-discrimination-by-recipients-of-federal-funds>.

[58] See *United States ex rel. Zafirov v. Fla. Med. Assocs.*, No. 24-13581 (11th Cir.).

[59] *Id.*

[60] See *United States ex rel. Polansky v. Exec. Health Res., Inc.*, No. 21-1052 (U.S.).

[61] *Id.*

[62] See 2025 FCA Recoveries Press Release.

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