

# Li Yu Examines FCA Kickback Pleading Standards in *Law360*

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In the article “Recent Cases Clarify FCA Kickback Pleading Standards” [published](#) by Law360, BLB&G Partner Li Yu examines the legal framework for False Claims Act (“FCA”) cases involving alleged kickback schemes.

The article highlights recent developments in key FCA cases, including the Second Circuit’s decision in *U.S. ex rel. Camburn v. Novartis*, which clarified that a violation of the Anti-Kickback Statute does not require a quid pro quo arrangement. Li argues that this holding, along with the U.S. Department of Justice’s recent \$59.7 million settlement in a case involving Pfizer, signals increased scrutiny of manufacturer-sponsored speaker programs as potential vehicles for unlawful remuneration. He concludes that *Camburn* provides a framework for assessing sham speaker programs and reinforces the growing alignment between courts and regulatory agencies in policing improper financial incentives in the healthcare industry.