

## Important: Shipment Insert

### **The False Claims Act: Fraud Against the Government, 4th ed**

Enclosed is the 2025 Cumulative Supplement to The False Claims Act: Fraud Against the Government, 4th ed. Please note that, for ease of handling, the materials in this shipment may ship in more than one box.

### **Shelving Instructions**

- PLACE the new 2025 Cumulative Supplement into the pocket.

### **Highlights**

New features and developments in 2025 Cumulative Supplement include:

- Supreme Court 2025 decision in *Wis. Bell, Inc. v. U.S. ex rel. Heath* on the meaning of “claim” under the FCA (Ch. 4);
- Developments in the standard for causation under the 2010 amendments to the Anti-Kickback Statute (Ch. 4);
- Application of the Supreme Court’s 2023 decision in *U.S. ex rel. Schutte v. SuperValu, Inc.* to evaluate scienter (Ch. 4);
- Notice standard for compliance employees under the FCA anti-retaliation provision and the res judicata effect of retaliation cases (Ch. 5);
- Application of the Excessive Fines Clause (Ch. 7);
- Decisions on whether the First-to-File and Public Disclosure Bars are jurisdictional (Ch. 11); and
- Government dismissal authority (Ch. 11).

### **Contact Us**

Thomson Reuters thanks you for subscribing to this product. Should you have any questions regarding this product, contact Customer Service at 1-800-328-4880 or by fax at 1-800-340-9378. If you would like to inquire about related publications, or wish to place an order, please contact us at 1-800-328-9352.



**Thomson Reuters™**

Thomson Reuters  
2900 Ames Crossing Road  
Eagan, MN 55121

[legal.thomsonreuters.com](https://legal.thomsonreuters.com)