

Two statutes, two bridges, one landing point

Stark Law and the Anti-Kickback Statute don't have any relationship to each other. They're independent. However, each has its own separate textual bridge into the False Claims Act.

42 U.S.C. § 1395nn · 42 U.S.C. § 1320a-7b · 31 U.S.C. § 3729 et seq.

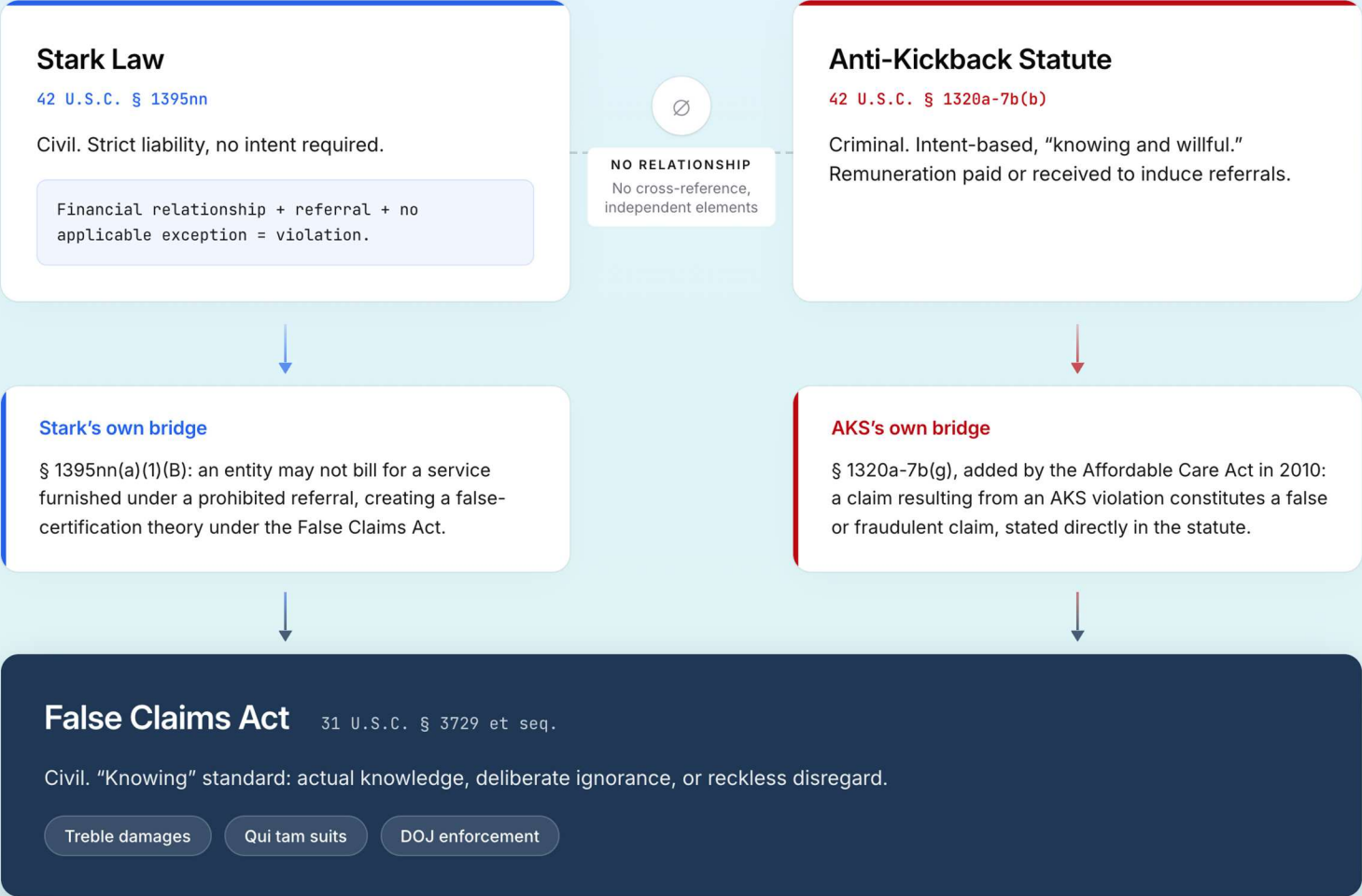


FIGURE Stark and the Anti-Kickback Statute ask different questions and don't reference each other, so satisfying one says nothing about the other. Each has built its own separate path into the False Claims Act. A properly conducted FMV opinion closes off one bridge, not both.