



SHERRARD
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CHRISTOPHER C. SABIS

Member

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Leader of the firm’s Government Compliance & Investigations group, Chris Sabis

recognizes that merely “responding” to governmental inquiries, enforcement actions, and litigation is often insufficient to protect his clients’ interests. Rather, he understands that efficient resolutions and positive outcomes in such matters are products of thoughtful and proactive approaches and the ability to take the initiative in addressing the concerns and issues that draw regulatory scrutiny. Chris leverages his advocacy skills, substantive knowledge of the law, and understanding of each client’s operations and practices to develop strategies that minimize cost, disruption, and exposure.

Chris concentrates his practice in Government Investigations, Litigation, White Collar Litigation, and Alternative Dispute Resolution. Much of his work involves fraud and abuse matters, with particularly extensive experience defending and mediating False Claims Act (FCA) cases involving allegations of healthcare and procurement fraud. He defends a wide range of clients in white-collar fraud investigations, commercial litigation, and government investigations.

Having served nearly a decade as an Assistant United States Attorney for the Middle District of Tennessee, Chris brings government-side insights and perspectives to his work that facilitate his understanding of investigators’ and regulators’ priorities and objectives. Combined with the productive working relationships he has cultivated and the credibility he has earned with government attorneys, this experience helps him find solutions that resolve immediate compliance concerns and minimize future ones.

Chris is on the American Arbitration Association (AAA)’s Roster of Arbitrators’ Commercial and Healthcare Arbitration Panels. He is a Rule 31 Listed General Civil Mediator by the Tennessee Supreme Court and a listed mediator and arbitrator with the American Health Law Association’s Dispute Resolution Service. He also has been a federal court-appointed neutral both as a mediator and as what Rule 53 refers to as a ‘special master’ empowered to oversee and resolve discovery disputes in complex commercial litigation. Prior to his tenure as an AUSA, Chris represented clients in complex commercial litigation matters at a large firm in Washington, D.C.

Active in many professional organizations, Chris serves as a Member of the Executive Committee and Chair of the Program Committee of the Harry Phillips American Inn of Court and is a former Hearing Examiner for the Tennessee Board of Professional Responsibility. He is a member of the Tennessee Bar Association, where he has served as chair and vice chair of the Federal Practice Section, and the Nashville Bar Association, where he is a former chair and secretary of its Historical Committee and a Nashville Bar Fellow. Chris is also a member of the American Health Law Association (where he serves on the Dispute Resolution Services Council), the Academy of Court-Appointed Neutrals, the Federal Bar Association, the Health Care Compliance Association, and the American Bar Association.

Chris is also committed to serving his community, donating his time and talents to several charitable and philanthropic endeavors in the Nashville area. He was named to the Tennessee Justice Center’s Pro Bono Hall of Fame for his work fighting cuts in Tennessee Medicaid (TennCare) benefits for a ten-year-old child with severe epilepsy. He currently serves as the Chair of the Board of Autism Tennessee and as a past chair on the Honorary Board of Stars Nashville, a non-profit that provides prevention, intervention, treatment, and training programs addressing bullying, substance abuse, violence, and social and emotional barriers to success in Tennessee schools. He is a member of the Rotary Club of Nashville and has also been an Adjunct Professor of Law at Belmont University. When not serving his clients or the community, he enjoys hockey, theater, and spending time with his wife and two young boys.

Education

- Georgetown University Law Center, J.D.
- University of Rochester, B.A.

Bar Admissions

- District of Columbia (inactive)
- Massachusetts (retired)
- Tennessee
- Supreme Court of the United States
- U.S. Court of Appeals for the First, Third, Fourth, Sixth, and District of Columbia Circuits
- U.S. District Court, Eastern District of Tennessee
- U.S. District Court of Massachusetts (inactive)
- U.S. District Court, Middle District of Tennessee

Practice Areas

- Alternative Dispute Resolution
- Arbitration & Mediation
- Business & Commercial Litigation
- Government Compliance & Investigations
- Healthcare
- Healthcare Litigation
- Litigation & Dispute Resolution
- Professional Liability
- White Collar Litigation

Representative Experience

- Key part of defense team that negotiated a favorable False Claims Act settlement and administrative resolution for a cardiologist accused of medically unnecessary stenting procedures and other billing issues.
- Successful reconsideration request of Medicare privileges revocation that saved client over \$500,000 in lost claims.
- Part of team that obtained a temporary injunction restoring a candidate to a primary ballot due to alleged violations of the Tennessee Open Meetings Act (the injunction was vacated on emergency appeal to the Tennessee Supreme Court)
- Secured favorable settlement and release terms for mental health provider in Tennessee Medicaid False Claims Act investigation
- Co-counsel in successful petition to reinstate prior level of TennCare benefits for 10-year-old girl with epilepsy, cerebral palsy, and numerous additional co-morbidities
- Secured CMS rescission of revocation of Medicare enrollment and billing privileges for veteran emergency physician
- [*United States v. Chambers, et al.*](#), No. 18-cr-00355 (M.D. Tenn.) (former credit union teller and co-conspirator sentenced to prison for bank fraud and aggravated identity theft) (during his tenure as an Assistant U.S. Attorney)
- [*United States ex rel. Dorsa et al. v. Miraca Life Sciences, Inc.*](#), No. 13-cv-1025 (M.D. Tenn.) (pathology laboratory paid \$63.5 million for allegedly providing illegal EHR system kickbacks to referring physicians in one of the ten largest FCA settlements of 2019) (during his tenure as an Assistant U.S. Attorney)
- [*United States ex rel. Newman v. OPKO Health, Inc.*](#), 3:13-cv-0700 (M.D. Tenn.) (former CEO and laboratory paid \$9.35 million to settle FCA allegations involving illegal EHR system kickbacks to referring physicians in first-of-its-kind settlement) (during his tenure as an Assistant U.S. Attorney)
- [*United States v. Woody Medlock, Sr., et al.*](#), No. 10-cr-0004 (M.D. Tenn.) (member of trial team that obtained convictions of former owners of Murfreesboro Ambulance Service) (healthcare fraud convictions affirmed by 792 F.3d 700 (6th Cir. 2015)) (during his tenure as an Assistant U.S. Attorney)
- [*United States ex rel. Meadows v. Mountain States Contractors, LLC*](#), No. 3:12-cv-0523 (M.D. Tenn.) (construction company paid \$2.25 million dollar to settle allegations of fraud involving a Disadvantaged Business Enterprise (DBE)) (during his tenure as an Assistant U.S. Attorney)
- [*United States ex rel. Gonzales v. J.W. Carell Enterprises et al.*](#), No. 12-cv-0389 (M.D. Tenn.) (home health company paid \$25 million to settle FCA allegations) (during his tenure as an Assistant U.S. Attorney)
- Tennessee Court of Appeals affirmance of Covenant families right to intervene in Tennessee Open Records Act litigation
- Successful court-appointed mediation of long-pending prisoner civil rights dispute

Recognition

- *Best Lawyers in America*®, Health Care, Litigation-Health Care, Qui Tam Law (2022 - present)
- Martindale-Hubbell®, AV Preeminent Peer Review Rated
- Nashville Bar Foundation Fellows Program (Class of 2021)
- Tennessee Justice Center Pro Bono Hall of Fame (2022)
- Tennessee Supreme Court Attorneys for Justice Pro Bono Honor Roll (2021 - present)

Speaking Engagements

- “A Look at AHLA’s New Commercial Arbitration Rules,” American Health Law Association Speaking of Health Law Podcast (November 2023)
- “Sub Regulatory Guidance in Fraud, Compliance, and Overpayment Actions,” American Health Law Association Fraud & Compliance Forum (September 2023)
- “Hunting Pandemic Fraud: Audits and FCA Litigation Resulting From the PHE,” American Bar Association Physicians Legal Issues Healthcare Delivery & Innovation Conference (September 2023)
- “Government Enforcement Trends in Health Information Technology,” Tennessee Bar Association Health Law Forum (October 2022)
- “False Claims Act Allegations & Resolutions Based on Statistical Sampling and Extrapolation,” American Health Law Association Fraud & Compliance Forum (September 2022)
- Speaker on Fraud, Becker Private Equity & Business Podcast (May 2022)
- “Fraud and Abuse: Recent Developments Related to Electronic Health Records,” American Health Law Association Speaking of Health Law Podcast, (April 2022)
- “Government Enforcement Trends in Healthcare and Procurement Fraud,” Association of Certified Fraud Examiners – Middle District of Tennessee (March 2022)
- “Switchbacks at the DOJ: the Sessions, Brand, and Garland Memos,” Panelist, The Federalist Society (March 2022)
- “False Claims Act Today – Middle Tennessee,” Panelist, Federal Bar Association (November 2021)
- “Hot Topics in Health Care Law,” Nashville Bar Association (November 10, 2020)
- “Hot Topics in Fraud and Abuse,” Tennessee Bar Association 32nd Annual Health Law Forum (October 8-9, 2020)
- “Civil Fraud Enforcement in America’s Healthcare Capital” Economic Club of Nashville (August 25, 2020)

Publications

- [“Advisory Opinion Highlights Inconsistency Between OIG and DOJ Regarding Gift Cards,”](#) *Health Law Weekly* (January 26, 2024)
- Chris Sabis, [HHS-OIG Kicks Off the New Year by Posting Four New Advisory Opinions](#), Sherrard Roe Voigt & Harbison Blog (January 10, 2024)
- [“But We Have an Arbitration Clause: Considerations when Hiring Californians,”](#) *Compliance Today*® (November 2023)
- Chris Sabis, [The Benefits of a Rule 53 Special Master](#), Sherrard Roe Voigt & Harbison Blog (April 11, 2023)
- Chris Sabis, [Key Takeaways From DOJ’s Annual FCA Recoveries Press Release: FY 2022 Edition](#), Sherrard Roe Voigt & Harbison Blog (March 6, 2023)
- [“Top 10 Issues in Health Law 2023: Fraud & Abuse Issues to Watch,”](#) *AHLA Health Law Connections* (January 2023)
- Chris Sabis, [Government Asks Supreme Court to Weigh in on the Knowledge Element of the False Claims Act: Does Evidence of Subjective Intent Matter in All Cases?](#), Sherrard Roe Voigt & Harbison Blog (December 8, 2022)
- Chris Sabis, [The First Rule of Internal Investigations: Get a Lawyer](#), Sherrard Roe Voigt & Harbison Blog (July 26, 2022)
- Chris Sabis, [Dental Providers Recent Targets of Government Enforcement Actions](#), Sherrard Roe Voigt & Harbison Blog (July 6, 2022)
- [“What FCA Bar Can Learn from District Court Hospice Ruling,”](#) *Law360* (April 2022)
- Chris Sabis, [Recent MDTN Decision Gives False Claims Act Plaintiffs a Wide Berth Under FRCP 9\(b\) When Alleging Wide-Ranging Fraudulent Schemes](#), Sherrard Roe Voigt & Harbison Blog (April 18, 2022)
- [“Co-management Agreement Pitfalls and Best Practices: A Case Study,”](#) *Compliance Today*® (March 2022)
- Chris Sabis, [The No Surprises Act Takes Effect: Get Your IDR On](#), Sherrard Roe Voigt & Harbison Blog (February 11, 2022)
- Chris Sabis, [Key Takeaways From DOJ’s Annual FCA Recoveries Press Release: FY 2021 Edition](#), Sherrard Roe Voigt & Harbison Blog (February 9, 2022)
- Chris Sabis, [Federal Court Rules Anti-Kickback Statute Can Apply to Services Provided to Long-Term Care Residents Who Are Not Covered by State Medicaid Plan](#), Sherrard Roe Voigt & Harbison Blog (January 12, 2022)
- [“Could Everything Be A Kickback?,”](#) *McKnight’s Long-Term Care News* (December 15, 2021)
- Chris Sabis, [More False Claims Act “Good Cause” Activity in the MDTN](#), Sherrard Roe Voigt & Harbison Blog (November 3, 2021)
- Chris Sabis, [Energy Company Ensnared by False Claims Act](#), Sherrard Roe Voigt & Harbison Blog (October 4, 2021)
- [“DOJ’s Agency Guidance Dance: A Tempest in a Teapot for Healthcare Fraud Cases?”](#) *The Health Lawyer & ABA eSource* (August 30, 2021)
- [“Fraud Enforcement in the Digital Arena— Electronic Health Records,”](#) chapter co-author, *Health Law Watch* (August 17, 2021)
- Chris Sabis, [Recent Healthcare Fraud Charges May Be a Warning to Middle Tennessee Healthcare Executives](#), Sherrard Roe Voigt & Harbison Blog (July 20, 2021)
- Chris Sabis, [MDTN Court Grants Government’s Motion to Dismiss Whistleblower Case](#), Sherrard Roe Voigt & Harbison Blog (May 3, 2021)
- Chris Sabis, [Flipping Over the False Claims Act](#), Sherrard Roe Voigt & Harbison Blog (April 12, 2021)
- Chris Sabis, [The False Claims Act & Procurement Fraud: It’s Not Just for Healthcare](#), Sherrard Roe Voigt & Harbison Blog (February 18, 2021)
- Chris Sabis, [Another One: DOJ Obtains Major Settlement with EHR Developer](#), Sherrard Roe Voigt & Harbison Blog (January 29, 2021)
- Chris Sabis, [Key Takeaways from DOJ’s Annual FCA Recoveries Press Release: FY 2020 Edition](#), Sherrard Roe Voigt & Harbison Blog (January 18, 2021)
- Chris Sabis, [Telehealth and Genetic Testing: The Nashville Experience](#), Sherrard Roe Voigt & Harbison Blog (December 8, 2020)
- Chris Sabis, [HHS-OIG Issues First Special Fraud Alert in Six Years: A Warning for Healthcare Providers Participating in Sponsored Speaker Programs](#), Sherrard Roe Voigt & Harbison Blog (December 8, 2020)
- Chris Sabis, [A Big EHR Fraud Defense Win and HHS Obtains Five Settlements Relating to Withholding of EHR Access](#), Sherrard Roe Voigt & Harbison Blog (September 29, 2020)
- [“Federal Magistrate Judge Grants Government Late Intervention in Health Care Fraud Case,”](#) *Health Law Weekly* (August 14, 2020)
- [“EHRs Are a DOJ Priority: Recent Cases May Explain Why,”](#) *Compliance Today*® (July 2020)
- Chris Sabis, [FCA Update: Two DOJ Settlements and an Appellate Victory for Whistleblowers](#), Sherrard Roe Voigt & Harbison Blog (July 27, 2020)
- Chris Sabis, [Telehealth is Here to Stay](#),” *Nashville Medical News Blog* (July 12, 2020)
- Chris Sabis, [Genetic Testing & Telehealth Headline Holiday Healthcare News](#), Sherrard Roe Voigt & Harbison Blog (July 7, 2020)
- Chris Sabis, [CMS Announces Enhanced COVID-19 Compliance & Enforcement for Nursing Homes](#), Sherrard Roe Voigt & Harbison Blog (June 17, 2020)
- Chris Sabis, [SBA Issues Interim Final Rule Regarding PPP Loan Forgiveness](#), Sherrard Roe Voigt & Harbison Blog (May 27, 2020)
- Chris Sabis, [The Paycheck Protection Program Meets Unintentional Humor](#), Sherrard Roe Voigt & Harbison Blog (May 14, 2020)
- Chris Sabis, [HHS-OIG Proposes New Regulations Expanding CMP Authority](#), Sherrard Roe Voigt & Harbison Blog (May 5, 2020)
- Chris Sabis, [PPP FAQs – Takeaways for Businesses Taking a Loan](#), Sherrard Roe Voigt & Harbison Blog (April 27, 2020)
- Chris Sabis, [New FCA Settlement: A Tennessee Link & a Warning for Government Contractors & DBEs at the Intersection of Healthcare & Procurement Fraud](#), Sherrard Roe Voigt & Harbison Blog (April 16, 2020)
- Chris Sabis, [An Update on Individual Liability in Fraud Cases: It’s Still Personal](#), Sherrard Roe Voigt & Harbison Blog (April 8, 2020)
- Chris Sabis, [Third Circuit Rejects AseraCare, Holds FCA Does Not Require “Objective Falsehood.”](#) Sherrard Roe Voigt & Harbison Blog (April 8, 2020)

Publications (continued)

- Chris Sabis, [The Brand Memo is Dead](#), Sherrard Roe Voigt & Harbison Blog (February 21, 2020)
- Chris Sabis, [FCA and Compliance Issues Concerning S/M/W/SDV Businesses Enterprises](#), Sherrard Roe Voigt & Harbison Blog (February 10, 2020)
- Chris Sabis, [Key Takeaways from DOJ's Annual FCA Recoveries Press Release](#), Sherrard Roe Voigt & Harbison Blog (February 4, 2020)
- Chris Sabis, [Telehealth and DME Subjects of Early 2020 Healthcare Enforcement Activity](#), Sherrard Roe Voigt & Harbison Blog (January 29, 2020)

Professional Activities

- AAA Roster of Arbitrators' Commercial and Healthcare Arbitration Panels (2023 -present)
- Adjunct Professor of Law, Belmont University College of Law, Pretrial Litigation (Fall 2013)
- Certificate of Completion: Rule 31 Civil Mediation Training, Lipscomb University (2016)
- Hearing Examiner, Tennessee Board of Professional Responsibility, District V (2018 - 2023)
- Member, Academy of Court-Appointed Neutrals (2023 - present)
- Member, American Bar Association (2003 - present)
- Member, American Bar Foundation (2024)
- Member, American Health Law Association (2012 - present)
- Member, American Health Law Association Dispute Resolution Services Council (2022 - present)
- Member, Harry Phillips Inn Executive Committee and Chair of the Program Committee (2016 - present)
- Member, Health Care Compliance Association (2020 - present)
- Member, Nashville Bar Association (2015 - present)
- Member, Tennessee Bar Association (2015 - present)
- Past Secretary & Current Chair, NBA Historical Committee
- Past Vice Chair & Chair, TBA Federal Practice Section

Civic Activities

- Board Chair and former Secretary, Autism Tennessee (2019 - present)
- Honorary Board Member, former Secretary, Board Chair & Co-Chair of the Board, Stars Nashville (2013 - present)
- Member, Economic Club of Nashville (2016 - present)
- Member & Founder and Past Chair of Environmental Sustainability Committee, Rotary Club of Nashville (2016 - present)
- Volunteer Assistant Coach, Montgomery Bell Academy Men's JV Hockey (2022 - 2023)
- Wine Committee Member, Nashville Wine Auction (2023 - present)