

# Gulnara Anzarova

ASSOCIATE

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Gulnara Anzarova advises health care providers and regulated businesses responding to government investigations, enforcement actions and audits involving federal and state agencies. She works with hospitals, health systems, physician groups and other providers on matters involving health care fraud and abuse enforcement, the False Claims Act, Anti-Kickback Statute, Stark Law, Medicare and Medicaid reimbursement and coverage requirements, FDA regulatory matters, Administrative Procedure Act (APA) challenges and related litigation.

Gulnara supports clients in high-stakes, time-sensitive matters involving government inquiries, internal reviews, factual record development and strategic responses to agency requests. Her work includes helping organizations address compliance challenges, manage risk and navigate evolving enforcement expectations in matters involving Medicare, Medicaid, federal benefits programs, data-driven enforcement activity and challenges to agency action under the APA.

She also assists clients with antitrust-related matters and regulatory issues involving SBA loans and other federal lending programs. Her experience includes work related to program integrity enforcement, Medicaid claims data, CMS initiatives, provider screening, enrollment scrutiny, data analytics expansion, cross-program enforcement alignment, HIPAA and Part 2 compliance issues, Medicare drug pricing models, FDA enforcement trends and federal anti-fraud priorities.

Before entering legal practice, Gulnara conducted research in tumor immunology, developing a foundation in scientific analysis and attention to detail that informs her work on complex investigations and data-driven matters.

## Education

- University of Denver Sturm College of Law (J.D., 2025)
- Wichita State University (B.S., *cum laude*, 2016)
  - Biology; Chemistry

## Bar Admissions

## Capabilities

- Health Care
- Health Care Litigation
- Government Investigations

- District of Columbia

## Languages

- Russian
- Turkmen

## Clerkships

- Clerkship for the U.S. Attorney's Office for the District of Colorado

# Publications

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April 29, 2026

**Fraud & Abuse: Recent Trends, Key Developments and What's Next**

April 21, 2026

**Texas Turns Up Heat on Medicaid Fraud**

March 20, 2026

**Trump Administration Intensifies Federal Benefits Fraud Enforcement with New Task Force**

March 6, 2026

**CMS Announces Wide-Ranging Fraud Crackdown**

January 7, 2026

**CMS Proposes GLOBE and GUARD Drug Pricing Models to Reduce Medicare Costs**

December 12, 2025

**Critical Deadline To Update Notices Of Privacy Practices Related To Substance Use Disorder (SUD) Information For All HIPAA Covered Entities**

*Co-Author, Mondaq*

December 8, 2025

**Critical Deadline to Update Notices of Privacy Practices Related to Substance Use Disorder (SUD) Information for all HIPAA Covered Entities**

November 13, 2025

**Courts Renew Scrutiny of the False Claims Act's Qui Tam Provisions**

November 10, 2025

**CMS Finalizes Sweeping Reforms to Skin Substitute Payments Amid Rising Costs and Enforcement Activity**

October 13, 2025

**DOJ Launches New Civil Enforcement Branch with Implications for Regulated Industries**