

ARREST / NOTICE TO APPEAR

19-11091

OBTS Number	ARREST / NOTICE TO APPEAR			1. Arrest 2. N.T.A.	3. Request for Warrant 4. Request for Capias	3	JUVENILE
Agency ORI Number 0500400	Agency Name Delray Beach Police Department			Agency Report Number (N.F.A.'s only) 4 0 19-016926			
Charge Type: Check as many apply: <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other	W/Weapon Seized Enter Type None/not Applicable			Multiple Clearance Indicator 24			
Location of Arrest (Including Name of Business) WARRANT REQUEST				Location of Offense (Business Name, Address) 3605 OLD DIXIE HWY, DELRAY BEACH, FL 33483			
Date of Arrest 11/07/2019	Time of Arrest	Booking Date 11/07/2019	Booking Time 11:15	Jail Date // : :	Jail Time	Location of Vehicle	
Name (Last, First, Middle) SKOCHINSKY, NATALIE MARI				Alias: Alias (Name, DOB, Soc. Sec. #, Etc.)			
Race W - White B - Black	1 - American Indian O - Oriental/Asian	Sex W	Date of Birth 06/18/1990	Height 5'07h	Weight	Eye Color BROW	Hair Color BROWN
Complexion LIGHT				Build		Indication of: Alcohol Influence Drug Influence	
Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)				Marital Status	Religion	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unk. <input type="checkbox"/>	
Local Address (Street, Apt. Number) 2022 BEACON HILL DR, SOUTHAMPTON, PA 18966				(City)	(State)	(Zip)	Phone
Permanent Address (Street, Apt. Number) 2022 BEACON HILL DR, SOUTHAMPTON, PA 18966				(City)	(State)	(Zip)	Phone
Business Address (Name, Street) GENESIS DIAGNOSTICS,				(City)	(State)	(Zip)	Phone
D/L Number, State 28973538 / PA				INS Number	Place of Birth (City, State)	Citizenship	
Co-Defendant Name (Last, First, Middle)				Race	Sex	Date of Birth	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 2. At Large
Co-Defendant Name (Last, First, Middle)				Race	Sex	Date of Birth	<input type="checkbox"/> 3. Felony <input type="checkbox"/> 4. Misdemeanor <input type="checkbox"/> 5. Juvenile
Name (Last, First, Middle)				Residence Phone		Business Phone	
Address (Street, Apt. Number)				(City)	(State)	(Zip)	
Notified by: (Name)				Date	Time	JUVENILE DISPOSITION 1. Handled/Processed within Department and Released 2. TOT IAC 3. Incarcerated	
Released To: (Name)				Relationship	Date	Time	
The above address was provided by <input type="checkbox"/> defendant and/or <input type="checkbox"/> defendant's parents. The child and/or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2526) informed of any change of address.				School Attended	Grade		
Property Crime? <input type="checkbox"/> Yes, by: <input type="checkbox"/> No				Description of Property	Value of Property		
Drug Activity S. Sell N. N/A P. Possess	S. Sell B. Buy T. Traffic	R. Smuggle D. Deliver E. Use	K. Disperse/ Distribute	M. Manufacture/ Produce/ Cultivate	Z. Other	Drug Type N. N/A A. Amphetamine	B. Barbiturate C. Cocaine E. Heroin
Charge Description PATIENT BROKERING OFFER/PAY				Statute Violation Number 817.505(1)(A)	Violation of ORD #		
Drug Activity	Drug Type N	Amount / Unit /	Offense #	Counts 23	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Warrant / Capias Number	
Charge Description CRIMINAL ATTEMPT TO SOLICIT/CONSPIRE 3RD DEGREE FELONY				Statute Violation Number 777.04(4D)	Violation of ORD #		
Drug Activity	Drug Type N	Amount / Unit /	Offense #	Counts 1	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Warrant / Capias Number	
Charge Description				Statute Violation Number	Violation of ORD #		
Drug Activity	Drug Type	Amount / Unit	Offense #	Counts	Domestic Violence <input type="checkbox"/> Y <input type="checkbox"/> N	Warrant / Capias Number	
Health / Apparent Physical Condition of Defendant				Any knowledge of the following: Explain: <input type="checkbox"/> Mental <input type="checkbox"/> Escape Risk <input type="checkbox"/> Medication <input type="checkbox"/> Deformities <input type="checkbox"/> Injuries			
Check which applies: <input type="checkbox"/> Released O.R. <input type="checkbox"/> Released to Parent/Guardian <input type="checkbox"/> T.O.Y. County Jail <input type="checkbox"/> Postal Bond <input type="checkbox"/> South County Mental Health				PROPERTY - Received By		Released By	
Transported By				Date Transported // : :	Time Transported	Other	
<input type="checkbox"/> INSTRUCTION NO. 1 - Mandatory appearance in court <input checked="" type="checkbox"/> INSTRUCTION NO. 2 - You need not appear in Court but must comply with instructions on Page 2.				Location (Court, Room) South County 200 W Atlantic Ave Delray Beach, FL 33444			
I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.				Court Date and Time			
Signature of Defendant (or Juvenile and Parent/Custodian)				Date Signed			
HOLD for Other Agency				Signature of Arresting Officer H. Lunsford		Name Verification (Printed by Arrestee)	
<input type="checkbox"/> Dangerous <input type="checkbox"/> Suicidal				Name of Arresting Officer (Print) LUNSFORD, HOWARD C		(PRINT)	
Intake Deputy				I.D. # 1055		PAGE	
Pouch #				Transporting Officer WARRANT REQUEST 1055 DBPD		I.D. # Agency	
				Witness here if subject signed with an "X".			

PROBABLE CAUSE AFFIDAVIT

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JUVENILE

A D M I N I S T R A T I V E	OBT Number		Agency ORI Number FL 0500400		Agency Name DELRAY BEACH POLICE DEPARTMENT		Agency Report Number 4 0 19-016926	
	Charge Type: Check as many as apply.		Special Notes:		Name (Last, First, Middle) SKOCHINSKY, NATALIE MARI		Race W	Sex F

C H A R G E S	Charge Description 817.505(1)(A) PATIENT BROKERING OFFER/PAY		Charge Description 777.04(4D) CRIMINAL ATTEMPT TO SOLICIT/CONSPIRE 3R	
	Victim's Name (Last, First, Middle) State Of Florida		Race	Sex

V I C T I M	Local Address (Street, Apt. Number) (City) (State) (Zip)		Phone		Address Source	
	Business Address (Name, Street) (City) (State) (Zip)		Phone		Occupation	

The undersigned certifies and swears that he/she has just and resonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.

The Person taken into custody . . .

committed the below acts in my presence. was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.

confessed to _____ admitting to the below facts. was found to have committed the below acts, resulting from my (described) investigation.

On the 7 day of November, 2019 at 11:51 (Specifically include facts constituting cause for arrest.)

The following investigation was conducted in Palm Beach County, Florida.

Abira Medical Laboratories d.b.a. Genesis Diagnostics ("Genesis") is a clinical laboratory with a principal address of 900 Town Center Drive, Suite H50, Langhorne, PA 19047. Genesis is owned/operated by Alan Miller (President) and Natalie Skochinsky (Vice President). Genesis is licensed to perform, among other things, urinalysis testing. Urine analysis or urinalysis ("UA") testing could be used to detect recent drug or alcohol use by a client. Like other medical tests, UA testing could be billed and reimbursed pursuant to the terms of an insurance policy. The tests are not cheap and can range from \$1,400 to \$6,031 each.

Genesis paid kickbacks to individuals, referred to as "reps," who referred urine specimens to Genesis for UA testing. Many of these reps reside in south Florida and sent urine that was collected from recovering addicts living in sober homes throughout Palm Beach County. Genesis offered \$200-\$500 per urine specimen, and later switched to a volume-based metric system for compensating reps. The reps in turn would pay a portion of the kickback to the sober home or treatment facility that sent the urine. This investigation revealed that Genesis paid well over \$3 million in kickbacks to reps in south Florida.

The "Florida Patient Brokering Act," makes it a felony offense for any person, health care provider, or health care facility, including any state licensed substance abuse service provider, to: "(a) Offer or pay any commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to or from a health care provider or health care facility."

Bradley Vercosa was a rep for Genesis and provided a sworn statement. Vercosa ran sober

A D M I N I S T R A T I V E	SWORN AND SUBSCRIBED BEFORE ME		SIGNATURE OF ARRESTING / INVESTIGATING OFFICER	
	NOTARY PUBLIC / CLERK OF COURT / OFFICER (F.S.S. 117.10)		NAME OF OFFICER (PLEASE PRINT)	
DATE		DATE		PAGE
11/07/2019		11/07/2019		1 OF 5

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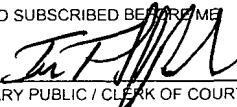

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homes in Palm Beach County and routinely collected urine specimens from residents of those sober homes to test for recent drug and/or alcohol use. Vercosa stated that David Zimmerman first introduced him to Genesis. Alan Miller of Genesis paid Zimmerman for each urine specimen that Vercosa sent to Genesis for UA testing. Vercosa stated Zimmerman would keep \$40-50 for each cup, and then pay Vercosa approximately \$110 per specimen, in cash. Beginning on or about February 10th, 2016, Alan Miller cut Zimmerman out and paid Vercosa \$140-150 a cup directly. The payments were wired from Genesis' Citizens Bank account to Vercosa's MD Marketing of South FL LLC. From 2/10/16 to 9/16/16 Genesis wired Vercosa a total of \$271,480.

Michael Harper was also a rep for Genesis and provided a sworn statement. Harper stated Alan Miller ran Genesis, along with Elliott Vernon and Natalie Skochinsky. Harper met with Miller and Skochinsky in their office in Broward County, where Miller and Skochinsky agreed to pay Harper \$300 per commercially insured urine specimen that he referred to Genesis for testing. Skochinsky handled all transactions/distributions of funds to reps such as Harper. Harper said he would prepare a list of each account and the number of specimens each account sent, and from that Skochinsky would prepare a "payroll form" and make payments accordingly from the Genesis accounts. Skochinsky was Genesis' Vice President, and Harper said if Elliott Vernon was Miller's right hand, Skochinsky was his left.

Vernon was an attorney and Director of Business Development at Genesis. Harper stated that during another meeting with Miller and Vernon, they told Harper that Genesis could pay him per specimen, so long as the insurance policies were commercial policies and they weren't paying doctors. Harper said that Vernon assured him, "it's not a big deal." Vernon also executed one of the marketing contracts on behalf of Genesis, detailed later in this affidavit. From April 2016 to March 2017 Genesis wired a total of \$2,524,195 to Harper's corporation called Galactic Consulting LLC. In October or November of 2016, Harper left this role as rep and handed over his accounts to Jason Gadreault, although he still continued to receive a smaller referral fee from Genesis for having referred Gadreault to Genesis directly.

Gadreault created Minuteman Consulting LLC, with a principal address of 3605 Old Dixie Hwy, Delray Beach, FL 33483. In his sworn statement Gadreault said that Genesis, run by Alan Miller and Natalie Skochinsky, paid him for each urine specimen he referred to Genesis for testing. Gadreault sourced urine from a number of sober homes and treatment facilities in Palm Beach County. Genesis would pay Gadreault for each urine specimen referred to their lab, and Gadreault would in turn pay what he called his "sub-reps," those individuals responsible for referring the urine from sober homes or treatment facilities. Initially Gadreault was paid for urine specimens he referred through Michael Harper, but once Harper decided to leave the business he transferred all accounts to Gadreault, who now received payments directly from Genesis.

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During the transition, Harper put Gadreault in contact with NatalSkochinsky. Gadreault took over and from November 2016 through May 2017 Genesis wired Gadreault's Minuteman Consulting a total of \$772,910 for urine referrals.

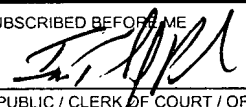
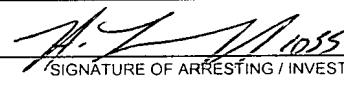
Gadreault identified the following 26 wire transfers from Genesis to his Minuteman Consulting PNC bank account as payments for UA referrals:

11/14/16 Transaction #015207 \$20,000; 11/18/16 Transaction #006879 \$31,190; 11/28/16 Transaction #035901 \$30,138; 12/2/16 Transaction #026984 \$30,138; 12/9/16 Transaction #038344 \$25,000; 12/16/16 Transaction #027202 \$30,000; 12/21/16 Transaction #035346 \$27,000; 12/23/16 Transaction #024872 \$15,000; 1/6/17 Transaction #005844 \$30,000; 1/6/17 Transaction #024032 \$18,000; 1/13/17 Transaction #030788 \$20,000; 1/20/17 Transaction #035352 \$25,000; 1/27/17 Transaction #034109 \$43,445; 2/3/17 Transaction #028698 \$35,000; 2/10/17 Transaction #029786 \$38,000; 2/21/17 Transaction #043576 \$25,000; 2/27/17 Transaction #032571 \$25,000; 3/10/17 Transaction #027866 \$50,000; 3/17/17 Transaction #037439 \$25,000; 3/24/17 Transaction #035472 \$22,000; 3/28/17 Transaction #024513 \$15,000; 3/31/17 Transaction #052982 \$50,000; 4/7/17 Transaction #017824 \$20,000; 4/18/17 Transaction #035686 \$30,000; 4/24/17 Transaction #022708 \$40,000; 5/2/17 Transaction #023322 \$30,000; 5/4/17 Transaction #013831 \$23,000.

23 of the wires originated from Genesis' Wells Fargo account. Four came from Genesis' Citizens Bank. The Citizens bank account lists Alan Miller as President and Natatlie Skochinsky as Vice President.

Genesis' agreement with Gadreault was memorialized in contracts, which Gadreault provided investigators. The first contract, titled "Provider Relations Agreement" was signed 11/17/16 by Jason Gadreault and Elliott H. Vernon, Director of Business Development at Genesis. Gadreault e-mailed the signed contract to Michael Harper, who forwarded the executed agreement to Natalie Skochinsky and Alan Miller.

The agreement states "that Contractor's engagement hereunder is on a 'part-time' basis and that Contractor shall devote part of Contractor's time and efforts exclusively to and for the benefit of Company. Contractor shall perform Contractor's duties hereunder for Sixty (60) hours per month." The compensation section reads, "Contractor shall be hired as a Sales Representative of the Company" and will be paid a base fee of \$500 per month, and a performance bonus. The performance bonus section reads, "In addition to the base fee described above, Contractor shall be eligible to receive a Bonus, based on the amounts set forth below, of Total Receivables, minus expenses, within each month, generated by a client account, introduced and managed by Contractor, provided that Company determines, in its sole discretion, that a Bonus is warranted [...] "Total Receivables" shall mean the aggregate of all monies collected by Company for the services performed on behalf of a client account, less any and all amounts refunded or credited to such client or third party payor as a result of overpayment, erroneous

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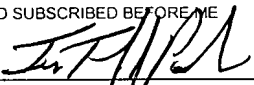
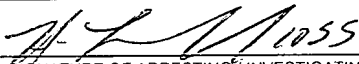
payments or bad checks. The following guidelines will be utilized by Company when considering a Bonus for Contractor: 1. Toxicology: \$200.00 per specimen*
*With the exception of Specimens received from Next Step, which are as follows:
a. Toxicology: \$175.00 per specimen."
Toxicology are urinalysis tests.

The second contract was made effective 6/16/17 and signed by Gadreault and Malcomb Chamberlain, Vice President, Compliance Officer, and Counsel for Genesis. This contract, titled "Service Agreement," reduces the Contractor's hours to 20 a month and duties include: securing new clients for Company to service; establishing, developing and maintaining a client account once a client decides to use Company's laboratory services, etc. The contractor compensation section of the contract reads that the contractor will receive a \$1,000 base fee per month as a draw against the performance bonus. The performance bonuses were based upon monthly specimen volume. For example, the contract read for a monthly specimen volume of 376-400 the performance bonus for the month would be \$64,020.

Gadreault provided emails and text messages from Natalie Skochinsky which confirmed her knowledge and participation in the payments wired from Genesis to Minuteman Consulting.

Gadreault didn't speak with the Genesis owner, Alan Miller, until after Genesis stopped paying him and he stopped referring to Genesis. Gadreault exchanged text messages with Miller, where Miller tried to bring Gadreault back on board and they discussed the money owed to Gadreault. Gadreault provided the text messages, from phone number 917-355-5929. In one text on 10/24/17 Miller writes, "We will work a payment out for you" and asks "what accounts are yours I want to pull a report." "Accounts" are what reps referred to the sober homes and treatment facilities that referred urine specimens to Genesis. On 12/13/17 Miller writes, "Are you able to bring in any other rehab facilities we can't take half way houses anymore" and later, "I would be happy to give you 15k by Tuesday and 15k more when the accounts are back sending. This way you get a full 30 and I get a comfort level." Miller also wrote, "In order for us to get paid we need certain documentation that you won't be able to get us maybe sum but not all leaving us with a void in payment. Much of those samples that we will loose on you have already been paid on. I need assurances for moving forward. We have not been perfect with you but we have paid." They agree on \$15,000 and Miller writes, "It went out Natalie sending you confirmation in 30 min."

In summary, Alan Miller and Natalie Skochinsky, as principals of Genesis, a licensed clinical laboratory, from 11/14/16 to 5/4/17 did pay Jason Gadreault for the referral of urine specimens from a variety of sober homes and treatment facilities in Palm Beach County, to Genesis. Elliott Vernon had knowledge of this payment practice and aided, abetted, and advised Genesis to commit patient brokering by executing a contract which directly violates F.S.S. 817.505.

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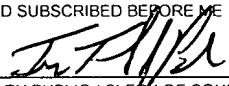

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Based on the above testimony and evidence, probable cause exists to charge Alan Miller and Natalie Skochinsky with twenty-three counts of Patient Brokering for the twenty-three wire payments to Gadreault in exchange for urine specimen referrals, pursuant to F.S.S. 817.505(1) (a). Probable cause also exists to charge Alan Miller and Natalie Skochinsky with one count of Conspiracy to Commit Patient Brokering pursuant to F.S.S. 777.04(1). Probable cause also exists to charge Elliott H. Vernon for one count of Aiding, Abetting, Advising, or Participating in Patient Brokering pursuant to F.S.S. 817.505(1) (d).

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