

2020CF 10176X

ARREST / NOTICE TO APPEAR

1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias 3 Juvenile N

OBTS Number	Agency ORI Number FL050015A		Agency Name Palm Beach County State Attorney's Office (15th Circuit)		Agency Report Number (N.T.A.'s only) 13-SA20002901	
Charge Type: Check as many as 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	If Weapon Seized Enter Type	Multiple Clearance Indicator 1	
Location of Arrest (Including Name of Business)			Location of Offense (Business Name, Address) ACADEMY HEALTH SOLUTIONS, 525 10TH ST, LAKE PARK, FL 33403			
Date of arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

Name (Last, First, Middle) MEYER, ROBERT WAYNE								Alias (Name, DOB, Soc. Sec. #, Etc.)			
Race W - White B - Black	I - American Indian O - Oriental/Asian	Sex W M	Date of Birth 08/06/1975	Height 6'0"	Weight 175	Eye Color BRN	Hair Color BRN	Complexion MED	Build MED		
Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)						Marital Status UNK	Religion UNK	Indication of: Alcohol Influence Drug Influence		Y	N
Local Address (Street, Apt. Number) 1412 ARABIAN RD E				(City) WEST PALM BEACH	(State) FL	(Zip) 33406	Phone ( )	Residence Type: 1. City 2. County 3. Florida 4. Out of State		1	
Permanent Address (Street, Apt. Number)				(City)	(State)	(Zip)	Phone ( )	Address Source			
Business Address (Name, Street)				(City)	(State)	(Zip)	Phone ( )	Occupation			
DL Number, State M600-779-75-286-0		Soc. Sec. Number		INS Number		Place of Birth (City, State) KEYPORT, NEW JERSEY		Citizenship USA			

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 2. At Large	<input type="checkbox"/> 3. Felony <input type="checkbox"/> 4. Misdemeanor <input type="checkbox"/> 5. Juvenile
Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 2. At Large	<input type="checkbox"/> 3. Felony <input type="checkbox"/> 4. Misdemeanor <input type="checkbox"/> 5. Juvenile

<input type="checkbox"/> Parent <input type="checkbox"/> Legal Custodian <input type="checkbox"/> Other:	Name (Last) (First) (Middle)	Residence Phone ( )
Address (Street, Apt. Number) (City) (State) (Zip)		Business Phone ( )
Notified by: (Name)	Date	Time
Relationship		Juvenile Disposition 1. Handled/Processed within Dept. and Released. 2. TOT HRS/DYS 3. Incarcerated
Released To: (Name)		Date
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
<input type="checkbox"/> Yes, by: (Name) <input type="checkbox"/> No: (Reason)		Grade
Property Crime? <input type="checkbox"/> Yes <input type="checkbox"/> No	Description of Property	Value of Property

Drug Activity N. N/A P. Possess	S. Sell B. Buy T. Traffic	R. Smuggle D. Deliver E. Use	K. Dispense/ Distribute	M. Manufacture/ Produce/ Cultivate	Z. Other	Drug Type N. N/A A. Amphetamine	B. Barbiturate C. Cocaine E. Heroin	H. Hallucinogen M. Marijuana O. Opium/Deriv.	P. Paraphernalia/ Equipment S. Synthetic	U. Unknown Z. Other
Charge Description PATIENT BROKERING		Counts 1	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Statute Violation Number 817.505 (1)(b)(4)(c) and 777.011		Violation of ORD #				
Drug Activity N	Drug Type N	Amount / Unit \$601,513.31	Offense # SA20002901	Warrant / Capias Number		Bond				
Charge Description		Counts	Domestic Violence <input type="checkbox"/> Y <input type="checkbox"/> N	Statute Violation Number		Violation of ORD #				
Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number		Bond				
Charge Description		Counts	Domestic Violence <input type="checkbox"/> Y <input type="checkbox"/> N	Statute Violation Number		Violation of ORD #				
Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number		Bond				
Charge Description		Counts	Domestic Violence <input type="checkbox"/> Y <input type="checkbox"/> N	Statute Violation Number		Violation of ORD #				
Drug Activity	Drug Type	Amount / Unit	Offense #	Warrant / Capias Number		Bond				

<input type="checkbox"/> Instruction No. 1 Mandatory Appearance in Court	Location (Court, Room Number, Address)	
<input type="checkbox"/> Instruction No. 2 You need not appear in Court but must comply with instructions on Reverse Side.	Court Date and Time	
Month	Day	Year
Time	A.M.	P.M.
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.		
Signature of Defendant (or Juvenile and Parent/ Custodian)		Date Signed

HOLD for other Agency Name	Signature of Arresting Officer	Name Verification (Printed by Arrestee)
<input type="checkbox"/> Dangerous <input type="checkbox"/> Suicidal	<input type="checkbox"/> Resisted Arrest <input type="checkbox"/> Other:	(PRINT)
Intake Deputy	I.D. #	Pouch #
Name of Arresting Officer (Print) INV. MARK BEREY SAO #1033	Name of Arresting Officer (Print) I.D. #	Agency
Transporting Officer	I.D. #	Agency
Witness here if subject signed with an "X"		PAGE
		OF

DISTRIBUTION: WHITE - COURT COPY GREEN - STATE ATTORNEY YELLOW - AGENCY PINK - JAIL GOLD - DEFENDANT (N.T.A.'S ONLY)



IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

AFFIDAVIT FOR ARREST WARRANT

BEFORE ME, Judge Janis Keyser of the Fifteenth Judicial Circuit Court in and for Palm Beach County Florida, personally appeared, Affiant, Investigator Mark Berey of the Office of the State Attorney-15<sup>th</sup> Judicial Circuit who, after being duly sworn by me, deposes and requests that an arrest warrant be issued for:

**Robert ("Rob") W. Meyer**

White Male

DOB: 08/06/1975

SSN: [REDACTED]

FL DL: M600-779-75-286-0

Last Known Address: 1412 Arabian Rd E, WPB, FL 33406

The target of this investigation is Rob Meyer, a resident of Palm Beach County, who worked for Mimi Bieda and Levi "Larry" Bieda, who owned addiction treatment and sober home facilities in Palm Beach County. Meyer helped manage those facilities for the Bieda family. Meyer was also partners with David Bieda, and he and David Bieda owned portions of a testing laboratory in Martin County. David is the son of Mimi Bieda and brother of Larry Bieda. As detailed below, the target was engaged in Patient Brokering activities that impacted those counties as well as other areas of south Florida and the country. Affiant hereby makes this Complaint against the above-listed person based upon probable cause that is detailed following a brief background overview:

Background on Substance Abuse Industry and Drug Testing:

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Over the past several years, state and local law enforcement agencies have been investigating a growing number of abuses and instances of fraud in the substance abuse treatment and recovery industry. The substance abuse treatment industry in south Florida has grown in recent years, and that growth has correlated with the influx of substance abuse patients, both from other parts of the state and outside the state.

"Sober homes," also known as "halfway houses" or "recovery residences," are dwellings where residents are supposed to live together in a drug-free environment while working to maintain sobriety. As a standard practice, sober homes offer no substance abuse treatment, but encourage treatment to occur at off-site treatment facilities. Sober home residents are expected to pay their own rent and utilities. In an effort to maintain a safe and sober environment, any resident found to be using drugs or alcohol while living there is usually removed from the home.

Substance abuse treatment facilities offer a wide range of treatment options, from medicated-assisted treatment ("MAT") to individual or group therapy sessions to assist patients in recovery. The levels and types of treatment are based on the type, stage, and severity of the addiction. Detox facilities typically offer 24-hour medically supervised in-patient detoxification programs, typically lasting from 3-10 days. Many also offer in-patient residential stabilization after the initial detox period.

Federal guidelines and insurance companies categorize these levels as Partial Hospitalization Programs ("PHP"), Intensive Outpatient Programs ("IOP"), and Outpatient Programs ("OP"), among others. PHPs, IOPs, or OPs can be billed to insurance companies when they are medically necessary, provided by, or overseen by, licensed medical professionals, and their services are lawfully rendered.

Pursuant to guidelines published by the Substance Abuse and Mental Health Services Administration ("SAMHSA"), PHPs are formal substance abuse treatment programs for patients with mild to moderate symptoms of withdrawal that are not likely to be severe or life-threatening and that do not require 24-hour medical support. PHPs are considered a "step down" from inpatient detoxification programs. Patients attending PHPs are required to participate in 30 or more hours of treatment per week, often provided in six-hour sessions per day, for five days a week. Clients who successfully complete a PHP program should then transition to an IOP.

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According to SAMHSA's Guidelines, IOPs are formal substance abuse treatment programs that adhere to a set of formal guidelines. IOPs must be overseen by a qualified professional. Patients must receive a thorough evaluation to determine the stage and severity of their illness, including medical and mental disorders. Qualified medical personnel must assign clients to a formal treatment plan.

Urine Analysis or urinalysis ("UA") testing is used to detect recent drug or alcohol use by a patient. UA testing complexity ranges from point of care ("POC") testing which provides instant results, to screening and confirmatory testing, which is sent to a laboratory, for more complex analysis. UAs can be billed to insurance companies, as long as the urine test is medically necessary and ordered by a medical doctor. Sober homes, committed to the sobriety of their residents, use UAs to confirm residents are abiding by house rules against substance abuse. Sober homes acting in compliance with SAMHSA's recommendations expel residents whose UA show recent drug and/or alcohol use.

Point of Care ("POC") urine testing involves collecting a client's urine in a specific cup designed for testing. The specimen is analyzed using a color banded or numbered dipstick, allowing for visual positive or negative results. POC urine testing usually tests for the presence of 9 to 13 specific types of drugs. POC tests typically cost between \$5 and \$10 and could be read easily by a layperson. POC testing is convenient, inexpensive, and the results can be read quickly. POC testing is the most common form of testing performed at sober homes and treatment facilities.

Screening testing is conducted in a laboratory setting and is more sophisticated than POC testing. These tests are typically billed to insurance companies at \$1,000 to \$3,000 per test.

Confirmatory testing, conducted in a laboratory setting, uses gas liquid chromatography, mass spectrometry, and/or gas chromatography, or high-performance liquid chromatography to analyze the urine specimen. These techniques are highly sensitive and accurately identify and quantify specific substances and their metabolites. Results of confirmatory testing take longer, and the tests are significantly more expensive, typically billing insurance companies \$3,000 to \$5,000 for each test.

#### **Affiant's Background:**

Your Affiant is an Investigator at the Office of the State Attorney-15<sup>th</sup> Judicial Circuit, and until July 10, 2019, was a Detective at the Palm Beach County Sheriff's Office ("PBSO") and was

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associated with PBSO since 2011. At PBSO your Affiant was assigned to the Criminal Investigations/Detective Bureau-District 6. Your Affiant is a Certified Fraud Examiner and holds a MBA in Finance/Accounting from Northwestern University's Kellogg Graduate School of Management. Your Affiant has extensive experience investigating financial crimes, Patient Brokering violations, Money Laundering, and Insurance Fraud.

Since early 2017 Your Affiant has participated as a member of the Palm Beach County State Attorney's Office Sober Homes Task Force ("SHTF") in numerous investigations of Patient Brokering (paying or receiving kickbacks for the referral of patients to a health care facility in violation of Fla. Stat § 817.505), Money Laundering, and Insurance fraud. Your Affiant's investigations primarily focused on:

- Clinical labs paying kickbacks to various entities for the referral of patients' urine analysis ("UA") testing
- Addiction treatment centers receiving kickbacks through shell entities
- Labs and treatment centers billing insurance companies for excessive UA testing and medically unnecessary tests.

### **INVESTIGATION OVERVIEW**

**F.S.S. 817.505 prohibits payments to or from a health care facility for the referral of patients or patronage. This investigation details Rob Meyer's role in soliciting or receiving from District Diagnostics, LLC, a licensed Florida laboratory, payments in return for referring patronage from Academy Health Solutions, LLC, a Florida licensed addiction treatment facility. Meyer, as a senior manager at Academy, aided the flow of UA samples to District for testing. Meyer benefited from over \$600,000 in payments from District in the form of owner distributions from a lab in which there is no evidence of any investment by him. A witness with direct knowledge said that Meyer was being rewarded by District for his efforts at Academy to maintain a high patient census (patient count), and that Meyer understood that his equity interest in District was directly correlated to the UA samples generated at Academy.**

**There are certain safe harbor exceptions to the Patient Brokering Act, including one that permits investments, however, the safe harbor provisions for investors require that eight specified standards all be met. Meyer's stake in District meets less than all eight of those standards.**

### **THE INVESTIGATION**

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Florida Sunbiz records show Mimi and Larry Bieda as the members of Academy Health Solutions, LLC ("Academy"), an entity which was formed 6/26/16 and owned an addiction treatment center in Lake Park, FL. (A 1/27/18 loan request signed by Mimi and Larry from Academy to Paradise Bank represents Mimi and Larry to each own 50% of Academy, and certified records of Florida's Department of Children and Families show Mimi and Larry Bieda as the listed owners on a license application dated 6/30/17 signed by Mimi Bieda.) As more completely described below, Rob Meyer was a member of Academy's management team. The Biedas had a business arrangement with Jayde Laboratories, LLC, a Palm Beach County company, whereby the Biedas acquired a 20% ownership interest in Jayde (through Quicken Results, LLC, a Florida company listing David Bieda as manager) and then directed their addiction treatment facility to send their patients' UA testing to Jayde.

On February 24, 2019 Adrian S. Rogers, principal owner of Jayde, was arrested and charged by the Florida State Attorney's Office-15<sup>th</sup> Judicial Circuit with 6 counts of Patient Brokering and 1 count of Conspiracy to commit Patient Brokering. In a September 19, 2019 sworn statement (that was given pursuant to a July 17, 2019 proffer agreement), Rogers confirmed that he negotiated with Mimi and Larry Bieda for the sale of a 20% interest of Jayde to the Biedas on or about April 1, 2017. (He said that although Mimi and Larry negotiated the deal, they brought Mimi's younger son, David Bieda, in to sign the agreement on behalf of Quicken.) He also acknowledged that the Biedas' facility provided approximately 80% of Jayde's total testing volume for all or part of the periods that Quicken was receiving payments from Jayde.

#### **TRANSITION FROM JAYDE LAB TO DISTRICT DIAGNOSTICS LAB**

Florida Sunbiz records show that a lab management company, Nexus Biologix, LLC ("Nexus") laboratory was established as an entity effective 8/31/17. David Bieda signed as Registered Agent and "member or authorized representative." District Diagnostics, LLC, a clinical lab, was also established on 8/31/17 according to a Sunbiz filing that listed Doone Designs LLC as Manager and David Bieda as Member and Registered Agent. (Doone was formed on 11/8/16 showing Rob Meyer as Manager and Adrian Rogers as Member.) 5 days after formation, District amended its Sunbiz records to show:

- Stephen Rogers as Registered Agent.
- Doone removed as Manager
- David Bieda signing as Manager

On 9/27/17 District opened a Wells Fargo Bank account. The certified account application records, signed by Rob Meyer and David Bieda, show:

- David Bieda as signer
- Robert W. Meyer as "Key Executive with control of the entity."

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- Doone as owner/partner

David Bieda and Rogers signed checks until 12/18, and then only David signed checks after that.

On 10/1/17, the District Operating Agreement was signed showing:

- Quicken Results, LLC owns 42.5%
- Doone Designs owns 50% (of this, A. Rogers owns 47.5% and Meyer owns 2.5%)
- Rob Meyer individually owns 7.5%
- Quicken is designated Manager with "all rights and powers to manage the business and affairs."
- David Bieda signs for Quicken, and Rogers and Meyer sign for Doone.

On 11/2/17 Florida Sunbiz records show that Elde Holding Corp was established by Robert W. Meyer as incorporator, registered agent, and President. Meyer would later use Elde Holding to receive his owner distributions from District.

In his September 2019 proffer, Rogers said that the Academy UA business moved to the new District lab from Jayde in mid-2018. He said that he wanted to start a new business (Nexus) that would manage labs, including a new lab (District) to replace Jayde, and then close Jayde down and focus on the new business. Insurance company claims records for the two labs show that Jayde filed claims through July, 2018, and District started billing for UA test claims in June, 2018. Rogers said that Nexus and District were owned in the same percentages as each other, and the ownership was himself (47.5%), the Bieda family (32.5% held by Quicken Results), Carly and Alan Diamond (the owners of the billing company for Academy, 10%), and Rob Meyer (10%). Rogers said that only he and the Bieda family invested capital in starting up Nexus and District.

On September 22, 2020 at 2:15 p.m. I spoke with Adrian Rogers by phone to clarify his recollection of the District ownership structure. While the signed Nexus agreement was consistent with Rogers' ownership recollection, the District Diagnostics signed agreement obtained on 9/16/20 showed that Carly and Alan Diamond did not actually own 10% of District. (His recollection of owner percentages was otherwise consistent with the signed agreement.) Rogers explained that even if they didn't own 10%, the Diamonds did in fact get distributions of 10% from District for a limited period of time because Nexus did not have the cash flow to pay them distributions. He said that Mimi and Larry agreed to pay the Diamonds their 10% of Nexus out of District profits because the Diamonds had helped set up District and were owed compensation.

On this same call, I asked him why Rob Meyer got a 10% interest in District without contributing capital. He said Meyer, in his role at Academy, was working to keep the beds at Academy as full as possible, and this helped to increase the UA testing volume sent to District.

On September 25, 2020 at 10:35 a.m. I again spoke by phone with Adrian Rogers to clarify whether Meyer knew that the primary customer of District was Academy. Rogers said that Rob Meyer was running the operations of Academy for Mimi and David Bieda. He also said that Meyer, as part-

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owner, attended all of the District partner meetings that he (Rogers) attended with Mimi, Larry, and the Diamonds. When asked directly if Meyer knew that the primary customer of District was Academy, Rogers replied "I am 200% sure." He said Meyer even helped Larry manage the build-out of the District lab space when they started the new lab venture.

On November 17, 2020 I spoke by phone with Adrian Rogers, and he discussed the District partner meetings attended by the partners noted above. Rogers said that at these meetings they discussed:

- Claims revenues of District
- District operating expenses
- Basis for distributions
- The "census" (occupancy levels) at Academy Health

Rogers said that Meyer was engaged in the discussions at these partner meetings, and sometimes questioned the credit card expenses submitted to District by the Biedas. (A review of American Express (Amex) credit card records of Bieda Management Inc., Attn: Levi Bieda, showed that up to 17 cards were issued under this account. Mimi and Larry Bieda, Rob Meyer, and at least 3 other known Academy employees held cards under this account. From mid-2018 thru 2019 the Bieda Management Inc. Amex bill was paid by online transfer from the Wells Fargo Bank account [REDACTED] of District Diagnostics. Sometimes it was paid directly by District, and later in the 2018/2019 period, District would transfer funds to Nexus Biologix to pay Amex. Bills averaged over \$100,000/month for much of 2018/2019.)

On a December 8, 2020 video conference with Adrian Rogers, he again said that Rob Meyer knew that Academy Health was the primary customer of District. Rogers said that Meyer was responsible for overseeing the scheduling of UA testing at Academy, and he said Meyer sometimes complained at District partner meetings about the response time for District getting UA results back to Academy. He said Meyer said he had spoken with a District lab employee multiple times about UA results taking too long. He said Meyer explained that the lab employee didn't want to work weekends and that slowed response times to Academy. Rogers also said that he and Meyer talked multiple times each day, and they discussed these same matters with each other.

Rogers said that he and Meyer discussed finding new customers for District "so that Academy wasn't the only one sending samples" to District lab. Rogers also explained that Meyer knew all Academy UAs were going to District in late 2018 and 2019. He said they discussed transitioning from Jayde lab to District in mid-2018, and Meyer would talk to him about the UAs results coming back late. Rogers said that the UA results were clearly identified with the lab name, and Meyer had access to and knowledge of the lab results. Rogers said "we would talk about it every day."

Rogers said that Meyer originally was going to get a 7.5% interest in District, but Meyer pressed for a 10% interest because "he said he's the one who's, uh, bringing in clients..." Meyer discussed "that his value was being able to keep a census high at Academy" so that "there was more revenue to the lab." Rogers said that Meyer convinced the partner group that he would bring value to

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District. When asked if Meyer understood that his interest in District was directly correlated to the UAs from Academy. Rogers said "yes, that's correct." He said he and Meyer discussed that.

On July 24, 2020 Cooperating Witness ("J.G.") was interviewed by ASA V. Goldberg and me pursuant to a limited use immunity letter dated 7/24/2020. (J.G.) said that she was the Bookkeeper/Administrator for Academy from June 2018 thru July 2020. She said she reported mostly to Mimi but to Larry also. She said David Bieda had an office at Academy, but he was there less often than Mimi and Larry. (J.G.) maintained all of the business bank account records and accounting records for the Bieda family businesses, including Quicken Results.

On an October 7, 2020 phone call with (J.G.), she said that Rob Meyer was running Academy's day-to-day operations with Mimi and Larry, and he also attended all of the District Lab partner meetings. She said Rob absolutely knew that most of the UAs that District tested came from Academy patients.

Evidence shows that Meyer was engaged in UA sample testing matters. An 11/18/19 GroupMe text message from "Rob Meyer Work" to multiple Academy employees read "Fridays samples will be late. FPL cut power Saturday and Sunday so they will be a day behind." And a 12/19/19 GroupMe text message from "Rob Meyer" to multiple Academy employees regarding UA test results said "When client returns from detox please let techs know only teddy puts the results in!" Edmund "Teddy" Sullivan was an Academy employee who managed UA testing and entered all UA test results into the KIPU record system. A 9/21/19 GroupMe text from Academy employee Brad Bush to Meyer said "HARC on the hook to lab up...", an apparent reference to HARC treatment center of Boynton Beach, Fl. committing to use District or an affiliated lab run by Nexus.

Certified Optum/United Healthcare ("Optum") claims records for District show that from June 2018 thru December 2019 District submitted 6,877 claims representing 80 insured members. Of these claims, 5,059, or 73%, were referred to District by Academy.

Certified BCBS claims records for District show that from June, 2018 thru November, 2019 District submitted 16,878 claims representing 400 insured BCBS members. Of these claims, 11,556, or 68%, were referred to District by Academy.

Based on my experience in reviewing thousands of insurance company records regarding addiction treatment centers and labs, BCBS and Optum combined account for a substantial majority of the insurance claims filed by these facilities. The combined BCBS and Optum claims filed by District for patient referrals from an Academy medical professional accounted for approximately 70% of all claims filed by District to these two insurers.

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A review of distributions to the owners of District shows that Rob Meyer received a total of \$601,513.31 through his Elde Holding as follows:

- 9 payments totaling \$249,750 from 9/6/18 thru 10/11/19 from District's Wells Fargo account ending in [REDACTED]
- 4 payments totaling \$123,077.12 from 6/3/19 thru 10/11/19 from District's City National Bank account ending in [REDACTED]
- 2 payments totaling \$58,412.75 from 11/19/19 thru 12/13/19 from District's BankUnited account ending in [REDACTED]
- 5 payments totaling over \$170,273.44 from 3/6/19 thru 8/9/19 indirectly from District that were funneled through Campus Wellness Group, LLC. Florida Sunbiz records show that Campus Wellness Group, LLC ("Campus") was established 4/30/17 by Danielle Hoberman, wife of Larry Bieda. Certified Wells Fargo Bank records show that on 5/3/17 Hoberman and Larry Bieda established a bank account for Campus as the two authorized signers. Campus received payments from both the Wells Fargo and City National Bank accounts of District, and then passed funds on from Campus to Elde on the same or following day.

F.S.S. 817.505 prohibits payments to or from a health care facility for the referral of patients or patronage. The referral of UAs from Academy with corresponding payments from District constitutes a violation of F.S.S. 817.505.

The Bieda family and Rob Meyer owned interests in District, and they referred a majority of the UA testing volume of District from their treatment facility (Academy.) The Bieda family received a disproportionate share of distributions from District. Some of those distributions were funneled through Campus, which then distributed a significant portion of its funds to entities controlled by the Bieda family (Quicken) and Rob Meyer (Elde.)

On June 30, 2020 Arrest Warrants were issued for Mimi Bieda, Levi ("Larry") Bieda, and David Bieda for:

- one (1) count each of Patient Brokering under §§ 817.505(1)(b)(4)(c) and 777.011, Fla. Stat., a 1st deg. Felony, for soliciting or receiving kickbacks in the total amount of \$431,785.28 for the referral of patients or patronage, involving 20 or more patients, to or from a health care facility (from Jayde to Quicken/the Bieda family) from July 6, 2017 thru September 12, 2018.
- one (1) count each of Patient Brokering under §§ 817.505(1)(b)(4)(c) and 777.011, Fla. Stat., a 1st deg. Felony, for soliciting or receiving kickbacks in the total amount of \$1,751,965.40

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for the referral of patients or patronage, involving 20 or more patients to or from a health care facility (from District to Quicken/the Bieda family) from July 19, 2018 through December 13, 2019.

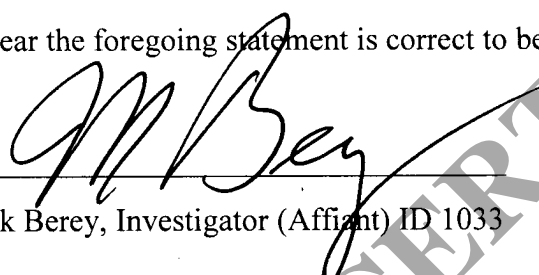
- one (1) count each of Money Laundering (over \$100,000) under 896.101(3)(a) and (5)(c), Fla. Stat., a 1<sup>st</sup> deg. Felony, from March 9, 2019 through August 9, 2019.

Rob Meyer, as a senior manager at Academy, aided the flow of UA testing to District by keeping Academy as close to full occupancy as possible. In a 16-month period, Meyer benefited from over \$600,000 in payments from District (directly and thru Campus Wellness) for owner distributions from a lab in which there is no evidence of any investment by him. Adrian Rogers said that Meyer was being rewarded by District for his efforts at Academy to maintain a high patient census.

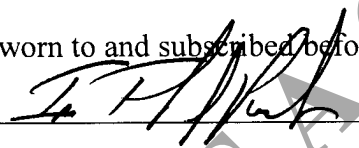
The above evidence forms the basis for the following charge against Robert W. Meyer:

- one (1) count of Patient Brokering under §§ 817.505(1)(b)(4)(c) and 777.011, Fla. Stat., a 1<sup>st</sup> deg. Felony, for soliciting or receiving kickbacks in the total amount of \$601,513.31 for the referral of patients or patronage, involving 20 or more patients to or from a health care facility (from Academy to District) from July 19, 2018 through December 13, 2019.

I swear the foregoing statement is correct to be best of my knowledge and belief.

  
Mark Berey, Investigator (Affiant) ID 1033

Sworn to and subscribed before me this 30th day of June, 2020.

  
Notary/LEO

Robert W. Meyer

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