19CF2651

Rough Arrest Only ☐

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

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

Juvenile: **N**

ADMINISTRATION

OBTS Number:		
Agency ORI Number: FL0500000	Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE	Agency Report Number: 06- 19-045329

Charge Type: Check as many as apply. ☒ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

Weapon Seized/Type 1. Yes 2. No: **2**

Multiple Clearance Indicator: **1**

Location of Arrest (Including Name of Business):

Location of Offense (Business Name, Address): **1509 PROSPERITYFARMS RD, LAKE PARK, FL**

Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle

DEFENDANT

Name (Last, First, Middle): **MANKO, ALANA NICOLE**

Alias (Name, DOB, Soc. Sec. #, Etc.):

Race (W - White, I - American Indian, B - Black, O - Oriental/Asian)	Sex	Date of Birth	Height	Weight	Eye Color	Hair Color	Complexion	Build
W	F	08/24/1960	5'1	120	BRN	BLONDE	MED	MED

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description):

Marital Status: **MARRIED**

Religion: **UNKNOWN**

Indication of: (Y / N / Unk.)
Alcohol Influence ☐ ☒ ☐
Drug Influence ☐ ☒ ☐

Local Address (Street, Apt. Number)	(City)	(State)	(Zip)	Phone
899 NE 32 ST	BOCA RATON	FL	33431	(561) 235-4533

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 (Street, Apt. Number)	(City)	(State)	(Zip)	Phone	Occupation
				( )	

D/L Number, State	Soc. Sec. Number	INS Number	Place of Birth	Citizenship
M520-014-60-804-0	[redacted]		RUSSIA	USA

CO-DEF

Co-Defendant Name (Last, First, Middle)	Race	Sex	Date of Birth	Status
MANKO, STEVEN ARNOLD	W	M	05/13/1944	☐ 1. Arrested ☐ 2. At Large ☒ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile
MANKO, IRENE KELLY	W	F	06/20/1988	☐ 1. Arrested ☐ 2. At Large ☒ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Othe — Name (Last) (First) (Middle) — Residence Phone

Address (Street, Apt. Number) (City) (State) (Zip) — Business Phone

Notified by: (Name) — Date — Time — Juvenile Disposition: 1. Handled/Processed within Dept. and Released 2. TOT HRS/CYF 3. Incarcerated

Released To: (Name) — Relationship — FCIC/NCIC — Date — Time

The above address was provided by defendant and/or defendant's parents. The child and/or parent was told to keep the Juvenile Court Clerk's Office informed of any change of address:
☐ Yes, by: (Name) ☐ No: (Reason)

School Attended — Grade

CODE

Recovery Information
0. N/A 1. Voluntary 2. Located Not Returned 3. Hospitalized 4. HRS Custody 5. Law Enforcement Custody 6. Returned to Parent 7. Deceased 8. Other: **0**

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

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
PATIENT BROKERING	2	☐ Yes ☒ No	817.505(1)(b)	

Drug Activity	Drug Type	Amount/Unit	Offense #	Warrant/Capias Number	Bond
N	N	$200,000.00	06-19-045329		

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
CONSPIRACY TO COMMIT PATIENT BROKERING	1	☐ Yes ☒ No	777.04(3)	

Drug Activity	Drug Type	Amount/Unit	Offense #	Warrant/Capias Number	Bond
N	N	$200,000.00	06-19-045329		

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Yes ☐ No		

Drug Activity	Drug Type	Amount/Unit	Offense #	Warrant/Capias Number	Bond

CHARGE

Charge Description	Counts	Domestic Violence	Statute Violation Number	Violation of ORD #
		☐ Yes ☐ No		

Drug Activity	Drug Type	Amount/Unit	Offense #	Warrant/Capias Number	Bond

NOTICE TO APPEAR

☐ Instruction No. 1 Mandatory Appearance in Court
☐ Instruction No. 2 You need not appear in Court but must Comply with instructions on reverse side.

Location (Court, Room Number, Address):

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

ADMIN.

HOLD for other Agency
Name:
☐ Dangerous ☐ Resisted Arrest
☐ Suicidal ☐ Other:

Signature of Arresting Officer: X 15527

Name Verification (Printed by Arrestee) (PRINT)

Name of Arresting Officer (Print): **DET. M. BEREY** — I.D. #: **15527**

Intake Deputy	I.D. #	Pouch #	Transporting Officer	I.D. #	Agency
					PBSO

Witness here is subject signed with an "X".

PAGE 1 OF 1

DISTRIBUTION: 1st WHITE - COURT 2nd WHITE - RECORDS GREEN - STATE ATTY. YELLOW - CID PINK - JAIL (Rough Arrest) GOLD - DEFENDANT (Misd.) or BLOTTER (Felony)

PROBABLE CAUSE AFFIDAVIT

OBTS Number	PROBABLE CAUSE AFFIDAVIT 1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias	3	Juvenile	N

Agency ORI Number	Agency Name	Agency Report Number
FLO 5 0 0 0 0 0	PALM BEACH COUNTY SHERIFF'S OFFICE	06 – 19-045329

Charge Type: Check as many as apply. ☒ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

Special Notes:

Defendant's Name (Last, First, Middle)	Race	Sex	Date of Birth
MANKO, ALANA NICOLE	W	F	08/24/1960

Charge Description	Charge Description
PATIENT BROKERING	CONSPIRACY TO COMMIT PATIENT BROKERING
Charge Description	Charge Description

Victim's Name (Last, First, Middle)	Race	Sex	Date of Birth
STATE OF FLORIDA			

Victim's Local Address (Street, Apt. Number)	(City)	(State)	(Zip)	Phone	Address Source

Victim's Business Address (Name, Street)	(City)	(State)	(Zip)	Phone	Occupation

The undersigned certifies and swears that he/she has just and reasonable 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.
☐ confessed to _____ admitting to the below facts.
☐ was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.
☒ was found to have committed the below acts, resulting from my (described) investigation.

On the 18TH day of MARCH, 20019 at 11:00 ☒ A.M. ☐ P.M. (Specifically include facts constituting cause for arrest).

NARRATIVE:

Beginning in 2017, I participated as a member of the Palm Beach County State Attorney's Office Sober Homes Task Force ("SHTF") in multiple investigations of Patient Brokering (paying or receiving kickbacks for the referral of patients to a health care facility). § 817.505(1)(a)-(b), Fla. Stat. My investigations primarily focused on clinical labs paying kickbacks to various entities for the referral of patients' urine analysis ("UA") testing.

One of those investigations involved Coastal Laboratory, LLC ("Coastal"), located at 1509 Prosperity Farms Rd., Lake Park, FL 33403. Florida Sunbiz records show that Coastal was formed on May 16, 2014 by Andrew Hope, Derek Pagan, and Craig Jochum. In September 2014, Thomas R. Stanley, II was added as "Manager" of the LLC, and in April 2015 Jesse Peters was added as "Manager" of the LLC. AHCA records show that Coastal was licensed as a clinical lab from February 26, 2015 to February 2017. During that 2 year period, Coastal billed insurance companies more than $141 million.

On April 21 2017, SHTF Investigators Ted Padich, David Kerschner and Analyst Susan Pentecost met with Rob Murphy and Louis Devaleix. Devaleix had set up the meeting to turn over evidence of possible Patient Brokering by Coastal. Devaleix and Murphy were providing health care recruitment services to Coastal through their Valeo Resources/Melior Health business, and they eventually acquired Coastal.

NARRATIVE CONTINUATION

Devaleix provided copies of checks drawn on the Bank of America and JPMorgan Chase accounts of Coastal allegedly representing kickbacks to multiple addiction treatment centers or their affiliates. One of the treatment centers whose owners allegedly received payments was Treatment Alternatives, LLC ("TA".) During 2015 and 2016, Florida Sunbiz records for TA listed Steven Manko as Manager. Current Sunbiz records show Steven Manko and Alana Manko as Managers. Alana Manko is the wife of Steven.

In a September 26, 2017 interview with Devaleix, he provided me with a 7-page document detailing Peters' marketer list and spreadsheet (collectively referred to as the "spreadsheet".) Peters later confirmed in subsequent interviews that he maintained the spreadsheet to calculate and track payments to marketers and treatment center owners for UA referrals.

In an October 19, 2017 interview of Julie Stagmiller, former employee of Coastal, she reviewed with me that spreadsheet and said that she had helped Peters maintain that spreadsheet. She said Stanley was also fully aware of the spreadsheet and the payments referenced therein, and she had met with Stanley and Peters together to review this spreadsheet in 2016. The spreadsheet includes "Treatment Alternatives" entries for insurance receipts collected in 2016 by Coastal. Under the TA heading, it also references amounts due to "Mister 2 30%." Florida Sunbiz records show that Mister M 2, LLC ("MM2") was established August 10, 2015. The listed Manager was Irene K. Manko, daughter of Alana Manko. Certified Bank of America records for MM2 list Irene Manko as the "account owner."

Stagmiller said that Peters and Stanley paid numerous people a percentage of the monies collected from insurance companies for UA testing that they referred to Coastal. She explained that the percent listed on the spreadsheet represented the amount that marketers got for their referrals. And, she said, in many cases the marketers were the owners of the treatment centers. The spreadsheet entries for January thru March, 2016 showed that, regarding TA, Coastal owed MM2 a total of $274,276.30 for that period. (Records detailed below show that a Coastal affiliate paid MM2 $200,000 in April, 2016.)

Stagmiller said that Steve Manko owned TA, and he got paid for referring his business to Coastal. She also said: "I heard Tom and Jesse talking on the phone to each other about how they had to make a Manko run. It was happening once a week for a while where they had to bring him anywhere from 10 to 30 grand." She said Tom would go to Manko's house with the cash. She said that Manko's daughter, Irene Manko, came to the office one time and they reviewed Peters' spreadsheet, and Irene complained that some other marketers were getting payments on the TA account in addition to MM2. She said Irene didn't recognize any of the other marketers besides MM2.

NARRATIVE CONTINUATION

Stagmiller said she "heard the conversations where Tom (Stanley) said he was going to the bank to make a withdrawal to bring it to a particular person." When asked who the person was, she said" Steve Manko, for sure."

In a June 29, 2018 interview, Peters described MM2 as Steve Manko's LLC. He said "Tom (Stanley) was taken off the bank account so Tom would tell me he needed money- I would go to the bank monthly and withdraw large denominations of cash and I would give it to him" He said Stanley would deliver the cash to Steve Manko's office at TA in Boca Raton, Fl. Peters said: "2, maybe 3 months into the process, Tom told me he was paying Manko in cash." He said Stanley delivered those payments to Manko at the TA office in Boca Raton, Fl. Peters said that the Mankos may also have received some payments from a Coastal Affiliate, Anchor Holdings 7, LLC.

Peters said that at some point he and Stanley met with the Mankos at the 2nd floor office of TA in Boca Raton, Fl. (An 8/22/16 text message exchange between Peters and Stanley referenced a 1 pm meeting in Boca Raton with the Mankos on that date.) They were in this meeting with Steve Manko, Alana Manko, and Irene Manko, and he said: "They handed us a piece of paper-the paper said that you're being watched-stop receiving the cash payments." Peters said that the Mankos ultimately severed the relationship with Coastal. He said that Alana Manko told him "we're not the kind of people that you should "f" with." In a February 5, 2019 meeting with Peters, he said that all 3 Mankos were in every meeting regarding TA and Coastal in 2016 and all three were engaged in the business.

On January 29, 2018, I interviewed Derek Pagan. Pagan said he met Irene Manko at Coastal once or twice and she was there talking about opening a partnership lab. Pagan thought that TA eventually opened a partnership lab with Coastal, but they shut it down because it wasn't making enough money. He said Coastal just paid treatment center owners referral fees to keep them happy when they weren't operating a partnership lab. Pagan said that based on the comments that Stanley made to him, "we kind of suspected that he was doing the duffle bag thing or something along those lines" with Manko.

On January 24, 2018 I interviewed Cathy Esra, past accountant for Coastal. Esra said she maintained checking accounts and dealt with other accounting functions. She said she mainly reported to Peters, but also dealt with Stanley and Steve Gregory, and to a lesser extent, Andrew Hope. (Gregory had been brought in to Coastal in 2016 as CFO to raise capital for Coastal and help manage financial affairs. Gregory used an account in the name of Anchor Holdings 7, LLC to make disbursements for Coastal for a portion of 2016.) Esra said Peters and Stanley signed the Coastal checks and had authority to make cash withdrawals. (She wasn't sure whether Gregory had that authority too.) She said she was instructed by Peters or Stanley to prepare checks for signature from Coastal accounts, and Gregory gave her direction regarding the Anchor Holdings 7 account.

Esra said that she would see cash withdrawals posted to one of the Coastal bank accounts, usually in $10k or $20k increments, and she would ask Peters or Stanley "what does it get coded to-or posted to, in the books?" She said they would say "Manko," and she later said that the name Mister M 2 (which I inadvertently referred to as Mister 2 Mister) was affiliated with Mankos. She said she knew Manko owned a treatment center, and, as an accountant, she thought it was unusual that a treatment center got payments from Coastal. She said she recorded the cash withdrawals for Manko in Coastal's QuickBooks program.

On February 8, 2018, the attorney representing Devaleix and Stagmiller provided the QuickBooks files for Coastal Lab for the time period 2015-2017. In those files, under tab "Transactions List by Vendor" from February 1, 2016 –February 23-2017 were the following entries:

Bank account Chase [redacted] Withdraw Pay to the order: Cash
07/21/2016 $10,000.00
Account Amount Memo
Distributions PL4 10,000.00 Cash Withdraw for Mister2 Mister-Coastal money to QA

Bank account Chase [redacted] Withdraw Pay to the order: Cash
07/21/2016 $12,000.00
Account Amount Memo
Distributions PL4 12,000.00 Cash Withdraw for Mister2 Mister-Coastal money to QA

Bank account Chase [redacted] Withdraw Pay to the order: Cash
07/28/2016 $20,000.00
Account Amount Memo
Commissions 20,000.00 Cash Withdraw for Mister2 Mister

Bank account Chase [redacted] Withdraw Pay to the order: Cash
08/03/2016 $20,000.00
Account Amount Memo
Distributions PL4 20,000.00 Manko-Mr2Mr

Bank account Chase [redacted] Withdraw Pay to the order: Cash
08/18/2016 $10,000.00
Account Amount Memo
Distributions PL4 10,000.00 Mr 2Mr

Bank account Chase [redacted] Withdraw Pay to the order: Cash
08/19/2016 $10,000.00
Account Amount Memo
Distributions PL4 10,000.00 Mr 2Mr

Bank account Chase [redacted] Withdraw Pay to the order: Cash
09/01/2016 $20,000.00
Account Amount Memo
Distributions PL4 20,000.00 Mr 2M LLC-Coastal money to QA

Bank account Chase [redacted] Withdraw Pay to the order: Cash
09/15/2016 $10,000.00
Account Amount Memo
Distributions PL4 10,000.00 Mr M 2

Bank account Chase [redacted] Withdraw Pay to the order: Cash
10/14/2016 $15,000.00
Account Amount Memo
Distributions PL4 15,000.00 Mr M 2

Bank account Chase [redacted] Withdraw Pay to the order: Cash
10/17/2016 $20,000.00
Account Amount Memo
Distributions PL4 20,000.00 Mr M 2

Florida Sunbiz records for PL4 show the authorized managers were Andrew Hope, Derek Pagan, Craig Jochum, and Jesse Peters. They were all original partners of Coastal (except for Peters, who was added in 2015.) During the time period of these disbursements, according to Andrew Hope, Peters and Stanley were in control of the finances of Coastal entities, including PL4.

In an October 18, 2018 interview with Paul Materia, he explained that his Apex Billing, LLC did all of the insurance claims billing for Coastal during 2016. When asked about Steve Manko, Materia said that he knew him and his daughter Irene for many years from the addiction/health care industry. Manko wanted his own lab so Materia introduced him to Peters to discuss a pod lab partnership. He said he and Peters met with Manko at TA in Boca Raton, Fl. Materia wasn't sure if Manko ever opened the pod lab.

Materia said that Manko was getting payments for providing UA's to Coastal. He said Manko was "old school" and wanted his payments in cash only. On one occasion in

2016, Materia said he was in Stanley's office at Coastal and he saw a stack of cash in an envelope on Stanley's desk. He said Stanley told him:" I have to bring this to fucking Steve…I have to give him cash…he's so old school he doesn't want a record of anything." Materia thought that Manko always wanted Stanley to personally deliver the cash payments. Materia also said that Peters complained to him about having to pay Manko in cash. He said he was not aware of any other services that Manko provided to Coastal other than sending the UA's from his treatment center.

On July 11, 2018 W. Adam Shirley was interviewed. Shirley was a licensed lab supervisor at Coastal from March, 2016 until mid-2017. Shirley said that Quality Analysis, LLC ("QA") was a partnership lab affiliated with Coastal and TA, but he said he didn't think it ever fully launched or ever did UA testing for TA. He said Coastal did the testing for TA. He thought that Steve Manko and his daughter Irene Manko owned TA. He said he visited TA in Boca Raton, FL once.

In an 8/30/18 interview with Peters, he confirmed that Anchor Holdings 7 was funded by Coastal, and he said that funds were funneled thru Anchor because Steve Gregory was taking over the finances of Coastal, and he was paying Coastal obligations thru the Anchor account. Peters said that the Anchor Holdings 7 account was controlled by Steve Gregory and Tom Stanley.

We discussed 2 wire transfers from Anchor Holdings 7 Bank of America account to the MM2 account at Bank of America. (I inadvertently referred to MM2 as "Mister 2 Mr." in our interview.) The transfers were posted to the MM2 Bank of America account ending in [redacted] on 4/13/16 and 4/22/16, and each was in the amount of $100,000. Peters confirmed that these payments were for delivering UA's from Treatment Alternatives to Coastal for testing.
The MM2 bank account ending in [redacted] lists Irene Manko as owner. This $200,000 was disbursed from this MM2 account to a range of recipients including, but not limited to:

- Treatment Alternatives (over $25,000)
- The Billing Group LLC (Irene's billing company)
- Broad & Cassel (law firm for Mankos, $45k)
- Housekeepers
- Geico auto
- Irene Kelly Manko B of A checking [redacted] (at least $20k)

A review of the Apex Billing records of Coastal provided by Materia on January 8, 2019 shows that for 2016 Coastal billed insurance companies more than $10.7 million for UA tests of TA patients.

Based on all of the above, probable cause exists to issue a warrant for the arrest of:

NARRATIVE CONTINUATION

1. Steve Manko, Alana Manko, and Irene Manko for two (2) counts of Patient Brokering under §§ 817.505(1)(b) and 777.011, Fla. Stat., a 3rd deg. Felony, for soliciting or receiving kickbacks in the amount of $200,000.00 for the referral of patients or patronage to or from a health care facility (from TA to Coastal) on April 13, 2016 and April 22, 2016.
2. Steve Manko, Alana Manko, and Irene Manko for one (1) count of Conspiracy to Commit Patient Brokering under §§ 817.505(1)(b) and 777.04(3), Fla. Stat. for agreeing, conspiring, combining, or confederating with each other, and/or Jesse Peters and/or Thomas R. Stanley, II to commit Patient Brokering under § 817.505(1)(a),(b), and (d), Fla. Stat. between at least January 1, 2016 and August 22, 2016 .

Sworn and Subscribed before me	
Signature Notary Public / Clerk of Court / Officer (F.S.S 117.10)	Signature of Arresting / Investigating Officer
Inv. Ted Padich	**Det. MARK BEREY #15527**
Name of Notary Public / Clerk of Court / Officer (F.S.S 117.10)	Name of Officer (Please Print)
3/18/19	**3/18/19**
Date	Date