

Agency ORI Number **FLO 500000** Agency Name **PALM BEACH COUNTY SHERIFF'S OFFICE** Agency Report Number **06- SH18-000002/PBSO 18-1290**

Charge Type: 1. Felony 3. Misdemeanor 5. Ordinance
 2. Traffic Felony 4. Traffic Misdemeanor 6. Other
 Weapon Seized / Type: 1. Yes 2. No
 Multiple Clearance Indicator:

Location of Arrest (Including Name of Business) _____ Location of Offense (Business Name, Address) **4348 145th Ave N Loxahatchee, FL, 33470**

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

Name (Last, First, Middle) **GAVER BRADLEY ALLEN** Alias (Name, DOB, Soc. Sec. #, Etc.) _____

Race: W - White B - Black O - Oriental/Asian Sex **M** Date of Birth **05/24/1974** Height **5'11"** Weight **180** Eye Color **BROWN** Hair Color **BROWN** Complexion **LGHT** Build **MED**

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description) **UNK** Marital Status **MARRIED** Religion **NONE** Indication of Alcohol Influence Drug Influence: Y N Unk.

Local Address (Street, Apt. Number) **4348 145TH AVE N** (City) **LOXAHATCHEE** (State) **FL** (Zip) **33470** Phone **(561) 307-8803** Residence Type: 1. City 2. County 3. Florida 4. Out of State 5. Juvenile

Permanent Address (Street, Apt. Number) **4348 145TH AVE N, LOXAHATCHEE, FL, 33470** (City) (State) (Zip) () () () Address Source **DAVID**

Business Address (Name, Street) **PURE THOUGHTS/PURE THOUGHTS AT TURTLE CREEK** (City) (State) (Zip) () () () Occupation **TREATMENT FACILITY OWNER**

D/L Number, State **6160-061-74-184-0, FL** Soc. Sec. Number _____ INS Number _____ Place of Birth (City, State) **NEW YORK** Citizenship **USA**

Co-Defendant Name (Last, First, Middle) **SWANSON, JENNIFER** Race **W** Sex **F** Date of Birth **04/15/1963** 1. Arrested 2. At Large 3. Felony 4. Misdemeanor 5. Juvenile

Co-Defendant Name (Last, First, Middle) _____ Race _____ Sex _____ Date of Birth _____ 1. Arrested 2. At Large 3. Felony 4. Misdemeanor 5. Juvenile

Parent Legal Custodian Other: _____ 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 / DYS 3. Incarcerated

Released To: (Name) _____ Relationship _____ Date _____ Time _____

The above address provided by defendant and / or defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk (Phone 355-2526) informed of any change of address. Yes, by: (Name) _____ No: (Reason) _____ School Attended _____ Grade _____

Property Crime? Yes 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. Hallucinogens M. Marijuana O. Opium/Deriv. P. Paraphernalia/Equipment S. Synthetics U. Unknown/Other

Charge Description **PATIENT BROKERING (AID AND ABET) (3RD DEG FEL)** Counts **24** Domestic Violence Y N Statute Violation Number **817.505(a)(1)(a)** Violation of ORD # _____

Drug Activity **N** Drug Type **N** Amount / Unit _____ Offense # **SH18-000002/PBSO 18-1290** Warrant / Capias Number _____ Bond _____

Charge Description **ACTING AS A SUBSTANCE ABUSE PROVIDER WHILE UNLICENSED (1ST DEG MISD)** Counts **1** Domestic Violence Y N Statute Violation Number **397.401(1)** Violation of ORD # _____

Drug Activity **N** Drug Type **N** Amount / Unit _____ Offense # **SH18-000002/PBSO 18-1290** Warrant / Capias Number _____ Bond _____

Charge Description _____ Counts _____ Domestic Violence Y N Statute Violation Number _____ Violation of ORD # _____

Drug Activity _____ Drug Type _____ Amount / Unit _____ Offense # **SH18-000002/PBSO 18-1290** Warrant / Capias Number _____ Bond _____

Charge Description _____ Counts _____ Domestic Violence Y N Statute Violation Number _____ Violation of ORD # _____

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

Location (Court, Room Number, Address) _____

Court Date and Time: Month _____ Day _____ Year _____ Time _____ AM _____ PM _____

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) _____

Dangerous Resisted Arrest Suicidal Other: _____ Name of Arresting Officer (Print) **E. HURDLE** I.D. # **16030** (PRINT) _____

Intake Deputy _____ I.D. # _____ Pouch # _____ Transporting Officer _____ ID # _____ Agency _____ Witness here if subject signed with an -X" **1 OF 1**

OBTS Number		PROBABLE CAUSE AFFIDAVIT				3		Juvenile	
Agency ORI Number FLO 5 0 0 0 0 0		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE				Agency Report Number 06 - SH18-000002, PBSO 18-1290			
Charge Type: <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 5. Ordinance Check as many <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 6. Other as apply.						Special Notes:			
Defendant's Name (Last, First, Middle) GAVER, BRADLEY ALLEN						Race W	Sex M	Date of Birth 05/24/1974	
Charge Description PATIENT BROKERING (AID AND ABET) 24 CTS., 3RD DEG FEL					Charge Description UNLICENSED SERVICE PROVIDER 1 CT., 1ST DEG MISD				
Charge Description					Charge Description				
Victim's Name (Last, First, Middle) STATE OF FLORIDA						Race	Sex	Date of Birth	
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...									
<input type="checkbox"/> committed the below acts in my presence.			<input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.						
<input type="checkbox"/> confessed to _____ admitting to the below facts.			<input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.						
On the 11 TH day of DECEMBER, 20017 at 00:00 <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest).									

NARRATIVE:

On December 11, 2017, I initiated an investigation into Pure Thoughts, INC/Pure Thoughts at Turtle Creek, INC, after the Sober Homes Task Force received a hotline complaint in reference to the addiction treatment facility, their equine (horse) rescue, and their affiliated sober homes. The original complaint reported several improper acts carried out by the owners of the above mentioned entities, such as drug use by patients being tolerated, free rent given to patients with insurance, and sober home residents dying from drug overdoses despite repeated reports of their drug use by the complainant/qualified personnel to the owners of the facility, Jennifer Swanson and Bradley Gaver.

The investigation in this case revealed an ongoing patient referral agreement between Robert Simeone, as owner and operator of Epiphany's Treatment Center, and the owners of Pure Thoughts/Pure Thoughts at Turtle Creek, Swanson and Gaver. The agreement involved a number of conditions and services, but ultimately resulted in over \$200,000 in payments from Simeone to Swanson and Gaver [Targets] in exchange for targets referring patients to Epiphany's for treatment.

Pure Thoughts, INC. is listed by the Florida Division of Corporations as being located at 4348 145th Ave N, Loxahatchee, FL, 33470. It lists Jennifer Swanson as the 'CFOD', Bradley Gaver as the "CD", and Holly A Chaney as 'D'. Per www.PTHR.org, (Pure Thoughts Horse Rescue) Pure Thoughts, Inc., is:

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“an all volunteer 501c3 non-profit organization dedicated to saving the lives of horses, yearlings and foals that were bound for slaughter, victims of starvation, neglect, abandonment and abuse.”

Pure Thoughts at Turtle Creek, INC, is listed by the Florida Division of Corporations as being located at 4348 145th Ave N, Loxahatchee, FL, 33470. Jennifer Swanson and Bradley Gaver are listed as the CFO and CEO respectively. Their website, www.purethoughtsrecovery.com describes the company as:

“the only one of its kind licensed for substance abuse in Palm Beach County, Florida. Our facility is the epitome of tranquility, located on a 25-acre horse farm, equipped with 3 barns, a resource center, offices and various other buildings.”

Pure Thoughts at Turtle Creek, INC is a DCF-licensed (License #5046455446101) addiction treatment facility, first receiving their probationary license on February 3, 2017. Per Pure Thoughts at Turtle Creek’s DCF documentation, Jennifer Swanson is listed as the Chief Financial Officer, and Bradley Gaver M. Ed. is listed as Chief Executive Officer. The facility is licensed for: Day or Night (often referred to as “PHP”, or Partial Hospitalization Program), Intensive Outpatient (“IOP”), and Outpatient Treatment (“OP”).

Prior to this investigation’s commencement, Epiphany’s Treatment Center, LLC (Epiphany’s), owned and operated by Robert “Bobby” Simeone, was investigated for possible Patient Brokering charges. Simeone was subsequently arrested in March of 2017, and eventually charged with twenty-six (26) counts of Patient Brokering. The following are summaries of witness statements taken over the course of this investigation. Former addiction treatment patients will be referred to as “CW” (cooperating witness), or by their initials:

On March 29, 2017, Det. Kerschner (WPBPD) took a sworn taped statement with Lauren Griffith, former employee of Epiphany’s. Ms. Griffith said she worked for Epiphany’s as an outreach coordinator from July 2016-October 2016. Her duties included going to other treatment facilities and creating relationships with them, as well as recruiting patients to Epiphany’s. Ms. Griffith explained that she would regularly see other sober home owners enter the treatment facility to collect payments, and listed ‘Pure Thoughts’ as being one of them. She described seeing a male and a female who she assumed owned Pure Thoughts, and recalled that the female owner was named ‘Jen’. She explained that Simeone would offer different business agreements depending on the sober home. Per Ms. Griffith, Simeone’s offers consisted of either \$500 per week per patient, or 30% of insurance payouts from the patients’ insurance policies.

On May 11, 2018, I took a sworn taped statement via phone with CW1. CW1 was sworn in by Clinton Police Department (Clinton, TN) Assistant Chief Becker, who identified CW1 via his/her Tennessee driver’s license, and witnessed the interview.

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CW1 advised that he/she attended Epiphany's for IOP treatment while living at Pure Thoughts' sober homes from November 1, 2016 through early 2017, shortly before Epiphany's was closed when Simeone was arrested for patient brokering charges. CW1 advised that Pure Thoughts/Pure Thoughts at Turtle Creek/"Epiphany's West" patients would attend treatment at Epiphany's on Wednesday evenings for three hours, and the other two days of treatment were held at "the farm," which was the common term for Pure Thoughts' location. On the days in which treatment occurred at Pure Thoughts, group therapy was led by either Gaver, or Swanson's daughter, Camille. CW1 advised that all treatment was licensed and billed to his/her insurance by Epiphany's, however treatment only actually occurred onsite and by Epiphany's employees one day out of three. CW1 advised that he/she did not pay rent while living at Pure Thoughts at Turtle Creek' sober homes while attending treatment at Epiphany's, as well as after Pure Thoughts at Turtle Creek obtained their DCF license. CW1 described Gaver and Swanson as being indiscrete when it came to business practices. CW1 recalled a situation where another patient had asked Swanson for a household item (CW1 couldn't remember exactly what the item was, however he/she gave examples of laundry detergent or toilet paper), however he/she remembered specifically that Swanson's response was, "I don't know how much you think your insurance is giving us, but it's really not that much." At the time the statement was made, Swanson and Gaver were transparent in admitting to patients that they did not have a DCF license, and explained to CW1 and the other patients that they were only working with Epiphany's while they were in the process of obtaining their license. Per CW1, it was common knowledge that Pure Thoughts patients had to go to Epiphany's once a week in order to keep Epiphany's employees "satisfied" in their business agreement with Gaver and Swanson. CW1 explained that most patients disliked going to Epiphany's and would protest going, as it was time consuming. CW1 recalled Swanson begging the patients on multiple occasions, claiming that she only needed "two or three" of the patients to go to Epiphany's on that given day.

CW1 recalled a two week period in December of 2016 where Swanson claimed that they were no longer working with Epiphany's, but after approximately two weeks, Swanson told the patients that they had to go back to Epiphany's. CW1 claimed that Swanson offered Starbuck's coffee and dinner to the patients who agreed to go to treatment at Epiphany's. CW1 recalled that for a short time after Epiphany's closed, the Pure Thoughts at Turtle Creek/Pure Thoughts patients only worked on the farm, and there was no drug testing or therapy. CW1 advised that he/she left Pure Thoughts at Turtle Creek on August 20, 2017, several months after Pure Thoughts at Turtle Creek stopped working with Epiphany's.

On June 1, 2018, I took a sworn taped statement from prior Epiphany's clinical director, Tamara Petrelli. Petrelli began working as clinical director for Simeone at Epiphany's in August 2015, and remained in that position until late November 2016. Per Petrelli, she

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has a Master's degree in social work, and is a licensed clinical social worker. Petrelli described her position as Epiphany's Clinical Director as follows: She oversaw the therapists, signed off on paperwork, ensured that paperwork was correctly filed, assisted with DCF licensing, scheduled group therapy, and designed all Epiphany's forms to coincide with DCF licensing.

Simeone told Petrelli that he had met with his attorney, who advised that his work with sober homes was legal, as it was considered "case management." Based on Ms. Petrelli's background and experience, she described proper case management as providing services for addiction treatment patients outside the realm of actual addiction treatment. She gave examples such as prenatal care and food stamps. She advised that as there was no case management inside Epiphany's itself, she was not given any information on that subject by Simeone. She advised that although the outside sober homes were allegedly being paid for "case management," no case management forms were ever provided throughout the entirety of her employment at Epiphany's. She claimed that close to the time of her resigning, she was working on creating a case management form which would be implemented, however it was never utilized. Ms. Petrelli was familiar with Pure Thoughts/Pure Thoughts at Turtle Creek, and offered the following in reference to their involvement with Epiphany's: She advised that Pure Thoughts/Pure Thoughts at Turtle Creek began working with Simeone in early summer of 2016. She was aware that a husband and wife owned the sober home and treatment facility in Loxahatchee, and remembered that Swanson's name was "Jen", although she couldn't remember Gaver's name. She was aware that they included horses in their therapy. She advised that Swanson and Gaver used their own therapists, and there were talks of possibly combining Pure Thoughts/Pure Thoughts at Turtle Creek and Epiphany's to create two locations, "Epiphany's East" and "Epiphany's West". She advised that all paperwork for Pure Thoughts/Pure Thoughts at Turtle Creek was completed and stored in Epiphany's Best Notes electronic medical records ("EMR") system.

Mrs. Petrelli advised that when Pure Thoughts/Pure Thoughts at Turtle Creek began bringing patients to Epiphany's, they conducted most of their therapy on their property in Loxahatchee, but would bring the patients to Epiphany's one to three times per week. Ms. Petrelli advised that all billing for Pure Thoughts/Pure Thoughts at Turtle Creek patients was done through Epiphany's, and that Pure Thoughts/Pure Thoughts at Turtle Creek did not bill for any services, themselves, to her knowledge. It should be noted that Ms. Petrelli was told that Pure Thoughts/Pure Thoughts at Turtle Creek was a DCF licensed treatment facility at the time they worked with Simeone. However Pure Thoughts/Pure Thoughts at Turtle Creek was not a licensed facility until they received their probationary license on February 3, 2017. Ms. Petrelli advised that she often saw Swanson and a male meeting with Simeone to pick up checks on Fridays, and Gaver

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would occasionally lead group therapy at Epiphany's. Petrelli advised that she sent her resignation letter on November 21, 2017.

A wage history check for both Swanson and Gaver revealed no wage history whatsoever for Swanson, and no history for Gaver past 2003.

On June 12, 2018, Det. Athol and I took a sworn taped statement from current Pure Thoughts employee N.R. N.R. was an administrative assistant at Pure Thoughts at the time of the interview. Prior to this, N.R. was a patient at Pure Thoughts, as well as Epiphany's from late 2015-early 2016. This time period was an approximation, as he/she could not remember the exact time period. He/She claimed that he/she had ceased attending treatment at Epiphany's by the time Simeone was arrested. N.R. advised that he/she attended treatment at Pure Thoughts/Pure Thoughts at Turtle Creek's treatment facility in Loxahatchee, and lived at Pure Thoughts/Pure Thoughts at Turtle Creek's sober homes in Wellington during that time.

N.R. explained that Swanson and Gaver did not yet have an active DCF license to treat addiction patients at the time he/she attended Epiphany's, therefore Pure Thoughts/Pure Thoughts at Turtle Creek used Epiphany's DCF license for services. N.R. advised that both Swanson and who he/she assumed was Gaver attended a meeting with "Bobby" (Simeone) to establish this working relationship. He/She revealed that patients did not have a choice as to which treatment facility they attended, and that all Pure Thoughts/Pure Thoughts at Turtle Creek patients attended Epiphany's for treatment, regardless of level of care. He/She explained that therapy was done at Epiphany's itself, however they also attended 'equine therapy' at Pure Thoughts/Pure Thoughts at Turtle Creek's location during this time. He/She explained that all Pure Thoughts/Pure Thoughts at Turtle Creek patients' insurance was billed through Epiphany's.

A search warrant for all Epiphany's Best Notes between August 1, 2015 through March 31, 2017 was executed. Upon receiving the records, Det. Kerschner was able to separate "Epiphany's West" patients from all others based upon sober home information which was stored within the records themselves. It should be noted that each of these patients had "Pure Thoughts" noted as their sober home within their Comprehensive Assessments. Within these records, group notes from Pure Thoughts/Pure Thoughts at Turtle Creek/"Epiphany's West" mentioned "experiential therapy"; a former therapist who completed the majority of these notes, Austin Schaper, later explained that "experiential therapy" was the term used to describe equine/horse therapy. This therapy was documented as having been done during IOP hours. It should be noted that according to Jill Carraher (Claims Integrity Manager for Florida Blue's mental health vendor) animal therapy of any kind is not currently a recognized billable service by health insurance companies.

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On July 3, 2018, I took a sworn taped statement with CW2, pursuant to a witness subpoena which was served on June 29, 2018. CW2 became a patient at Pure Thoughts in summer of 2015, after being referred to the treatment facility while attending an AA/NA meeting. After volunteering at Pure Thoughts equine rescue and subsequently relapsing, CW2 attended a separate detox in Miami, and then came back to Pure Thoughts/Pure Thoughts at Turtle Creek as a patient approximately in the summer of 2016. CW2 remained at Pure Thoughts/Pure Thoughts at Turtle Creek as a patient for three months, and then continued working at Pure Thoughts/Pure Thoughts at Turtle Creek after graduating.

While living at Pure Thoughts as a patient, he/she had active insurance, and did not pay rent. Approximately the summer of 2017, Gaver told CW2 that he couldn't have patients working at the farm during IOP hours, as he recognized that it is illegal. CW2 advised that at one point in his/her treatment, all patients attended treatment at Epiphany's. During this time, he/she did not have a choice as to where he/she went for treatment, and residency at Pure Thoughts/Pure Thoughts at Turtle Creek was contingent upon attending Epiphany's for treatment. Patients were attending treatment at Epiphany's 3-5 times per week. CW2 advised that Pure Thoughts/Pure Thoughts at Turtle Creek and Epiphany's were two separate entities, and no Epiphany's employees worked at Pure Thoughts/Pure Thoughts at Turtle Creek, or vice versa. CW2 advised that neither Epiphany's nor Pure Thoughts/Pure Thoughts at Turtle Creek ever provided case management to patients. CW2 advised that after equine therapy, Gaver would sometimes lead group therapy at Epiphany's for Pure Thoughts/Pure Thoughts at Turtle Creek patients, in the presence of an Epiphany's therapist.

On 7/11/18, a sworn taped statement was taken from former Pure Thoughts/Pure Thoughts at Turtle Creek therapist, Austin Schaper. This statement was in response to a witness subpoena issued to Mr. Schaper prior to this date. Per Mr. Schaper, he is currently a registered mental health counselor intern, and was a therapist/substance abuse counselor for Pure Thoughts/Pure Thoughts at Turtle Creek beginning in late November/early December of 2015, until he resigned in early May of 2017. Prior to working for Pure Thoughts, Schaper explained that he worked for another treatment facility called Transformations, who were partnered with Pure Thoughts (horse rescue) for "equine therapy." When hired by Pure Thoughts/Pure Thoughts at Turtle Creek, he filled out no paperwork, and the hiring process included a discussion and a handshake. He claimed that he had an annual salary, and was a W-2 employee for Pure Thoughts/Pure Thoughts at Turtle Creek. While working for Pure Thoughts/Pure Thoughts at Turtle Creek, Schaper advised that he did one-on-one, group therapy, and occasionally family sessions. At the Pure Thoughts/Pure Thoughts at Turtle Creek property, Schaper claimed to have answered to both Jennifer Swanson and Bradley Gaver equally. Schaper was under the impression that Swanson and/or Gaver were on

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the lease for the sober home properties with another male, T.S., however he confirmed that Swanson and Gaver both oversaw the residents of the sober homes. Schaper explained that he sometimes went to the sober homes to conduct therapy sessions. He explained his time working at Epiphany's as unpleasant. Schaper described not getting along well with Simeone, and advised that Simeone never discussed clinical decisions with him. While he did not know the details, Schaper advised that he knew Pure Thoughts/Pure Thoughts at Turtle Creek and Epiphany's had a business relationship of some sort. Schaper explained that he was a W-2 employee for Pure Thoughts/Pure Thoughts at Turtle Creek during the entirety of his employment, and was neither a 10-99 nor a W-2 employee at Epiphany's while the two businesses were partnered. He further explained that he did no HR paperwork for Epiphany's, and was paid by Pure Thoughts/Pure Thoughts at Turtle Creek. Schaper claimed that all medical records completed by him during this time were done through Epiphany's Best Notes EMR system. Schaper advised that he was never told to provide case management for patients by Simeone. Schaper confirmed that there were never any paper case management forms completed for Epiphany's. Schaper advised that the only Pure Thoughts/Pure Thoughts at Turtle Creek employees who worked with Epiphany's were he, Swanson, Gaver, and for a short time, another therapist named Lisa Cohen. Schaper claimed that therapy at Epiphany's also included equine therapy at Pure Thoughts/Pure Thoughts at Turtle Creek, however that was not always the case. Schaper did not believe that Pure Thoughts/Pure Thoughts at Turtle Creek was licensed at the time that they worked with Epiphany's.

On August 29, 2018, lawful search warrants were executed at 4348 145th Ave N, 4420 145th Ave N, and 14341 43rd Rd N, Loxahatchee, Florida. During the execution of the search warrants, both targets of the investigation (Jennifer Swanson and Bradley Allen Gaver) were located on the property. The following are summaries of what was discussed during Swanson's and Gaver's separate sworn taped statements: Gaver advised that approximately four and a half years ago, Pure Thoughts worked under Transformations Treatment Center, INC's (Transformations) license by providing their patients with group horse therapy once a week. This business relationship began after a horse boarder at Pure Thoughts named Joanne (unknown last name) suggested the partnership to Swanson and Gaver. Gaver claimed that the owner of Transformations (whom he identified as "Mark") obtained a separate DCF license to use Pure Thoughts' property as a second location. For reference, per the Florida Division of Corporations, the registered agent for Transformations Treatment Center, INC is Mark Gerhardt. After an initial meeting, Transformations patients began attending group "horsemanship" therapy one time per week, led by Gaver, and accompanied by various Transformations therapists. Gaver advised that Pure Thoughts was paid one-hundred dollars per Transformations patient. At that time, some Transformations patients lived in sober homes in Wellington which were operated by Transformations, and only those patients attended equine therapy at Pure

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Thoughts. According to Gaver, this business relationship lasted for approximately a year and a half.

Gaver explained that he and Swanson met with a former business associate, Darlene Frisina, and her father, who offered an option for the soon-to-be former Transformations patients living in Wellington; Those patients could continue to attend equine treatment at Pure Thoughts, and they would use a license owned by a doctor in Delray Beach named Dr. Ramirez (whom was later found to be Dr. Carlos Ramirez, owner of Women's Wellness Institute, INC, (Women's Wellness)). Gaver explained that they were never paid by Dr. Ramirez, regardless of the "per head" business agreement they had, similar to the one they previously had with Transformations.

Gaver claimed that after this failed business plan, Swanson reached out to Simeone, whom she previously knew (although Gaver couldn't advise as to how she knew him). He advised that they were to be paid per patient, under the same business model which they used with Transformations, however he had no knowledge as to the amount they were paid because Swanson handled all finances. Gaver claimed that Simeone paid them to run the equestrian program; however, Gaver also admitted that they have been running their equestrian program for the last fifteen years, and this business relationship with Simeone occurred approximately two years prior to the date of this interview, and lasted around one year. Gaver claimed that all patients were "Epiphany's patients", although Pure Thoughts/Pure Thoughts at Turtle Creek oversaw the patients living at the sober homes they leased, as well as transported patients back and forth. Gaver advised that they "took over" the leases for the sober homes in Wellington, and began driving the patients to Pure Thoughts/Pure Thoughts at Turtle Creek, as well as Epiphany's location on Palm Beach Lakes Blvd. in West Palm Beach.

Gaver advised that Pure Thoughts/Pure Thoughts at Turtle Creek housed the patients, and they went to treatment through Epiphany's. Gaver claimed that they also had halfway residents living at the sober homes at that time. Patients would attend treatment at Pure Thoughts/Pure Thoughts at Turtle Creek as well as Epiphany's three times per week. Gaver advised that their patients used Dr. Citrin as their primary care doctor while they were working with "Bobby" (Epiphany's), before Pure Thoughts at Turtle Creek obtained their own license. Gaver claimed that once T.S. couldn't pay the rent anymore, Gaver and Swanson took over. He advised that Simeone never sent Epiphany's patients to live at the sober homes in Wellington, because he had his own sober homes. Gaver originally claimed that patients at their sober homes were allowed to go to other treatment centers if they chose, but then advised that they were only provided transportation to Epiphany's for treatment. Gaver claimed that they stopped working with Epiphany's because they wanted to obtain their own license. When asked if he was aware of Pure Thoughts being paid hundreds of thousands of dollars by

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Simeone, Gaver denied it, and added that he would find that "illogical" and "unexpected".

On the same date as above, August 29, 2018, I took a sworn, taped, post-Miranda statement from Jennifer Swanson (DOB 4/15/1963). This statement was taken at her residence located at 4348 145th Ave N, Loxahatchee Groves, FL, during the execution of the aforementioned lawful search warrant. Swanson advised that she and her husband, Gaver, entered the addiction treatment industry in 2014 after being approached by an employee of Transformations Treatment Center, INC. (Transformations). She and Gaver then entered into a business relationship with the treatment center whereas Transformations would send their patients to Swanson's and Gaver's horse rescue, to work with and train the horses as a form of therapy. She advised that Transformations severed the business relationship once they realized that sending their patients from Delray to Loxahatchee was not lucrative for their business. Swanson explained that around the end of 2015/beginning of 2016, she met an individual who would later become a business associate, Darlene Frisina. They formed a business relationship whereas Frisina was a 1099 employee of Pure Thoughts/Pure Thoughts at Turtle Creek who was paid a salary to assist them in getting licensed by DCF for addiction treatment. Swanson added that at this time, although Pure Thoughts/Pure Thoughts at Turtle Creek was not licensed, she had addiction therapists working at the horse rescue. It should be noted that Frisina is listed as "CEO" per the Florida Division of Corporations reinstatement of Pure Thoughts at Turtle Creek, INC, auto-signed by Bradley Gaver on March 21, 2016. When Swanson was asked why Frisina would be listed as CEO, if her job was simply to obtain a DCF license for Pure Thoughts at Turtle Creek, Swanson claimed that she was never listed as such in their corporate documents. She then claimed that they were planning to go into a partnership; however that never came to fruition, so it's possible that Frisina was listed as CEO at some point. She claimed that at this time, Frisina was working with Women's Wellness Institute, INC. (Women's Wellness), and from Pure Thoughts/Pure Thoughts at Turtle Creek's location, she took care of Women's Wellness' electronic medical records system, and orchestrated having their patients sent to Pure Thoughts/Pure Thoughts at Turtle Creek's location for treatment under their license. Swanson claimed that although she was left out of this business agreement, she knew that the intent was for Dr. Ramirez (Per the Division of Corporations, Carlos E. Ramirez, Women's Wellness' President/CEO) to add Pure Thoughts/Pure Thoughts at Turtle Creek's location for treatment legalities, however this also never came to fruition. Swanson advised that she was introduced to Epiphany's CEO, Robert "Bobby" Simeone in the spring of 2016, by Frisina's friend, "Bob." Bob advised Swanson that they could work with Simeone, as Simeone had an active treatment center, and as Pure Thoughts at Turtle Creek did not yet have a license, they could provide treatment under Simeone's license. She advised that there were several meetings to discuss this business relationship. Swanson claimed that Frisina attended the first meeting, but

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every subsequent meeting took place between she, Simeone, and sometimes Simeone's wife (Vivian Simeone). She added that some of the meetings were in his office, however at least one took place at an unknown Starbuck's location. After several meetings in the spring of 2016, the final agreement was that Swanson and Gaver would operate what was referred to as "Epiphany's West", and treatment would take place at Pure Thoughts at Turtle Creek's location. She claimed that it was agreed upon that Pure Thoughts would be paid a percentage (although she could not advise the exact number) of the total amount paid by "Epiphany's West" patients' insurance policy payments to Epiphany's.

The "Epiphany's West" patients were the patients who were already living in the Folkestone sober homes prior to this business agreement being made. Swanson claimed that she assisted in obtaining the business tax receipt for Epiphany's (listed at Pure Thoughts at Turtle Creek's location), and that Simeone was supposed to add Pure Thoughts at Turtle Creek's location to his DCF license, however he never did. Swanson claimed that Simeone never sent her patients, and that they only worked with the patients living at the sober homes on Folkestone Cir. Swanson initially claimed that the sober homes on Folkestone Cir. were not associated with Pure Thoughts at Turtle Creek, and that they were leased and controlled by T.S.. When asked why Pure Thoughts/Pure Thoughts at Turtle Creek would have paid T.S., if he/she was not an employee, Swanson claimed that there was originally a plan for T.S. to work for Pure Thoughts/Pure Thoughts at Turtle Creek as their COO and driver, but however that never came to fruition. Contrary to Swanson's claims, per Pure Thoughts, INC.'s bank statements (Wells Fargo account # [REDACTED]) reveal that T.S. was paid \$25,471.18 between May 31, 2016 through December 30, 2016 by Pure Thoughts/Pure Thoughts at Turtle Creek during the time that his/her name was on the leases for the Folkestone Cir. housing.

Swanson advised that their patients attended group therapy periodically at Epiphany's location. She claimed that all insurance billing for their patients was done through Epiphany's. When asked if she was an Epiphany's employee, Swanson claimed, "He didn't pay me like an employee, but he paid for the Epiphany's West." She advised that Simeone completed a W-9 tax form for Pure Thoughts/Pure Thoughts at Turtle Creek. She also confirmed that neither she nor Gaver had their own offices at Epiphany's location. Swanson advised that she had limited knowledge as to the operations at the Epiphany's location. Swanson claimed that she was paid to operate "Epiphany's West", however it should be noted that per Swanson, prior to she and Gaver meeting Simeone, they were paying for their own therapists, they were already treating patients through other treatment facilities' licenses, and participated in the operation of specific sober homes.

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Although Pure Thoughts at Turtle Creek was already an active corporation per the Florida Division of Corporations as of March 21, 2016, payments from Epiphany's were made to a Pure Thoughts, INC (horse rescue 501©(3)) bank account. It should be noted that the sole signers for this bank account (Wells Fargo account # [REDACTED]) were Swanson and Gaver. Per Swanson, from this account, she paid their therapists and all other treatment-related expenses. Swanson claimed that Gaver was in charge of the "equine stuff" (horse therapy) which took place on their property. She advised that he also led group therapy at Epiphany's location periodically, but claimed that the reason was that there were some "rowdy" patients, and Gaver needed to "keep them in line". Swanson claimed that Simeone wanted the "Epiphany's West" patients to submit a urinary analysis (UA) three days a week, which he would then collect and send to a lab for testing.

Swanson advised that she and Gaver stopped working with Simeone at the end of 2016 because she realized that (as she specifically advised), "...we pay all the bills out here and he is making all the money." She advised that there was a period of time in December where she stopped sending patients to Epiphany's, however after a meeting between she, Simeone, and Vivian Simeone, it was decided that they would continue working together, corroborating CW1's claim. She advised that their patients went to Epiphany's one more time after Christmas in 2016, and then she and Gaver parted ways with Epiphany's.

On September 18, 2018, a sworn taped statement under witness subpoena was taken with previously mentioned T.S., in the presence of his/her attorney, Tyler Dimaio. T.S. advised that he/she met Swanson and Gaver in 2015 after completing addiction treatment at Transformations Treatment Center, INC. (Transformations), at which time he/she was given the option to attend aftercare treatment at Pure Thoughts (which was operating as a Transformations satellite location, under their license). At this time, T.S. lived in the sober homes located on Folkestone Cir., which were then operated by Transformations. According to T.S., all patients living at those sober homes were attending treatment at Pure Thoughts. After three months of attending treatment at Thoughts, in the fall/Winter of 2015, T.S' insurance was cancelled, so he/she discontinued treatment, and moved into a family member's house. He/She then began volunteering at Pure Thoughts, at which time initial conversations were had between T.S., Gaver, and Swanson, in reference to T.S. forming a business relationship with Pure Thoughts/Pure Thoughts at Turtle Creek.

The business agreement entailed creating a licensed treatment center, whereas T.S., Swanson, Gaver, and previously mentioned business associate Frisina would each own 25% of the company. T.S. advised that late 2015, he/she took over the leases from Transformations for the housing on Folkestone Cir after Pure Thoughts/Pure Thoughts at Turtle Creek ended their business agreement with Transformations. From

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that point on, patients who were once Transformations patients, continued attending treatment at Pure Thoughts/Pure Thoughts at Turtle Creek and living in the Folkestone housing. A meeting was held on January 26, 2016, at which time all four participants signed a founder's agreement which spelled out the above. T.S. advised that he/she initially invested \$35,000 (thirty-five thousand dollars) in exchange for 25% ownership of Pure Thoughts at Turtle Creek. Originally, T.S' duties as co-owner of Pure Thoughts at Turtle Creek included managing the housing, and driving the patients to and from treatment.

Originally, the agreement was that T.S. would be paid \$100-150 per patient per week, based on the number of patients attending treatment at Pure Thoughts at Turtle Creek. T.S. purchased a van to be used as a transport vehicle for Pure Thoughts at Turtle Creek patients. The van was later confirmed to be a white 2015 Ford van bearing Florida tag (GTVT76), originally registered on July 9, 2016. The amount paid by Pure Thoughts at Turtle Creek to T.S. was intended to reimburse him/her for money he/she spent out of pocket in reference to the housing, such as: rent, van payment, gasoline for the van, landscaping, etc.; any additional money collected in this weekly payment once all payments were made would count toward his/her original investment. However, T.S. advised that the financial portion of the agreement quickly disintegrated, and Swanson began paying him/her simply as reimbursement for money spent out-of-pocket for Pure Thoughts at Turtle Creek-related costs. T.S. claimed that Swanson told him/her that they did not have enough money to pay him/her as per their agreement, and would promise to pay him/her back; she would pay T.S. in lump sums of random amounts, typically based on payments made to her by treatment facilities. T.S. advised that he/she never had access to any Pure Thoughts at Turtle Creek or related entities' bank accounts, and that every payment he/she ever received was orchestrated directly via Swanson. T.S. claimed that he/she never broke even nor made a profit throughout the entirety of this business agreement, based on the amount he/she paid out of pocket for business-related expenses, and the amount paid to him/her. T.S. advised that he/she was never paid a salary.

T.S. advised that when he/she began managing the housing at Folkestone Cir., decisions in reference to housing were agreed upon by all four owners of Pure Thoughts at Turtle Creek. T.S. confirmed that Swanson had final say as to who moved into or was dismissed from the housing at Folkestone Cir. T.S. claimed that although he/she held the leases, Swanson was in charge of the patients on an operational level, and T.S. had to refer to her in reference to any decisions made involving the housing. T.S. admitted that several patients were not charged rent. He/She also advised that Swanson would give favors to patients, to include paying for patients to go to a strip club, paying for patients to go bowling, giving Publix gift cards to certain patients, paying for meals for all of the patients, etc.

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T.S. was present when Frisina was fired by Swanson in late 2015/early 2016, and shortly thereafter, Swanson began speaking with Simeone (Epiphany's). T.S. recalled Frisina introducing Swanson to Simeone, however he/she did not remember Frisina participating in the formation of the business agreement. T.S. recalled attending two business meetings with Swanson and Simeone in reference to forming a business relationship with Epiphany's. Although he/she could not recall exact numbers, he/she advised that the proposed business set-up was similar to that which was formed between Pure Thoughts at Turtle Creek and Women's Wellness, as well as Transformations; Pure Thoughts at Turtle Creek would be paid a percentage of patients' insurance policy payments for services billed by Epiphany's. T.S. recalled beginning to take their patients to and from Epiphany's in the spring of 2016. T.S. claimed that although he was part owner of Pure Thoughts at Turtle Creek, he was never present for the signing of any business agreements, nor were official verbal agreements ever made in his/her presence.

T.S. brought their patients to and from both Pure Thoughts/Pure Thoughts at Turtle Creek's location, as well as Epiphany's location. T.S. did not recall any operational changes once this agreement was made, other than driving the patients to a new location. T.S. could not recall new patients moving into the Folkestone Cir. housing, and he/she continued to be paid by Pure Thoughts/Pure Thoughts at Turtle Creek. T.S. recalled continuing to be paid erratically, and he made an effort to obtain more information regarding Pure Thoughts' payment by Epiphany's. T.S. advised that this business agreement continued for several months. T.S. recalled one of the final reasons he/she left was when Swanson called him/her and forced him/her to drive patients to Epiphany's whom T.S. understood to be halfway residents (i.e. no longer attending treatment, but living in the sober homes). T.S. finally severed his/her relationship with Swanson and Gaver in May of 2017.

T.S. added that Swanson became aggressive toward him/her in reference to who went to Epiphany's.

While examining evidence seized during the search warrants, the following correspondence was noted:

In a letter dated August 29, 2016, Sarah Kennedy-Liccardi, MS (Substance Abuse Coordinator for the Department of Children and Families) addressed a notice to Gaver, advising that he (and "Pure Thoughts Recovery Equine Program") were "operating and/or managing a substance abuse service provider", and that they were doing so without a license. A second letter was found with the above mentioned notice, this one dated September 30, 2016, signed by Jennifer Swanson and notarized by Holly Ann Chaney (Commission # FF 234403). In this letter, Swanson admits that Pure Thoughts at Turtle Creek, INC., was not licensed at that time, and she also claimed that, "at this time, we are not providing substance abuse services, intensive outpatient treatment, inpatient treatment, detoxification, and or day/night treatment." It should be noted that

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between August 29, 2016 (the date in which Ms. Liccardi sent the original notice) and September 30, 2016 (the date in which Swanson sent her response), Pure Thoughts, INC. received three of twenty-four separate checks from Epiphany's Treatment Center, those three checks alone totaling \$28,895.50. According to Liccardi, DCF has no record of Swanson's response at this time.

Additional documents were seized during the lawful search warrant, stored in boxes labeled: Box 1 House, Box 2 House, and Box 5 Office, which included files referred to as "West Claim Reports". These reports appear to list every claim submitted by Epiphany's for Pure Thoughts/Pure Thoughts at Turtle Creek/"Epiphany's West" patients between specific timeframes, all of which fit within the time frame during which Epiphany's was paying Pure Thoughts, INC. The reports list the following information by column: Charge Claim ID, Charge Entered Date, Charge From Date, Patient Full Name, Charge CPT Code, Charge Amount, and Payer Name (insurance company). Pure Thoughts, INC's bank records between May 1, 2016-January 31, 2017 contain twenty-four (24) checks from Epiphany's Chase Bank account # [REDACTED], an account for which Simeone is the sole signer, made payable to Pure Thoughts, INC. The checks are dated from May 31, 2016 through December 30, 2016, the memo line on each check states "501(c)(3)", and total \$207,939.12. The checks were all deposited into Pure Thoughts, INC's Wells Fargo account # [REDACTED], and Swanson and Gaver are the sole signers on the account. The checks read as follows:

1. Check #1181 dated May 31, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$3,782.98. Memo on bottom left of the check states "501(C)(3)".
2. Check #1200 dated June 16, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$2,012.19. Memo on bottom left of the check states "501(C)(3)".
3. Check #1222 dated July 1, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$5,002.00. Memo on bottom left of the check states "501(C)(3)".
4. Check #1236 dated July 15, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$2,009.57. Memo on bottom left of the check states "501(C)(3)".
5. Check #1259 dated July 29, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$16,675.39. Memo on bottom left of the check states "501(C)(3)".
6. Check #1265 dated August 4, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$3,770.68. Memo on bottom left of the check states "501(C)(3)".
7. Check #1277 dated August 12, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$10,493.60. Memo on bottom left of the check states "501(C)(3)".

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8. Check #1286 dated August 19, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$3,806.52. Memo on bottom left of the check states "501(C)(3)".
9. Check #1297 dated August 26, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$13,332.47. Memo on bottom left of the check states "501(C)(3)".
10. Check #1307 dated September 9, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$10,209.21. Memo on bottom left of the check states "501(C)(3)".
11. Check #1328 dated September 20, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$9,716.50. Memo on bottom left of the check states "501(C)(3)".
12. Check #1331 dated September 23, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$8,969.79. Memo on bottom left of the check states "501(C)(3)".
13. Check #1338 dated October 3, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$6,832.32. Memo on bottom left of the check states "501(C)(3)".
14. Check #1346 dated October 7, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$17,097.20. Memo on bottom left of the check states "501(C)(3)".
15. Check #1357 dated October 21, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$9,063.26. Memo on bottom left of the check states "501(C)(3)".
16. Check #1364 dated October 27, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$9,315.88. Memo on bottom left of the check states "501(C)(3)".
17. Check #1368 dated November 4, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$11,256.96. Memo on bottom left of the check states "501(C)(3)".
18. Check #1375 dated November 18, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$5,085.92. Memo on bottom left of the check states "501(C)(3)".
19. Check #1379 dated November 21, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$5,982.81. Memo on bottom left of the check states "501(C)(3)".
20. Check #1383 dated December 1, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$8,775.29. Memo on bottom left of the check states "501(C)(3)".
21. Check #1382 dated December 15, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$14,099.27. Memo on bottom left of the check states "501(C)(3)".

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22. Check #1386 dated December 20, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$10,036.16. Memo on bottom left of the check states "501(C)(3)".
23. Check #1390 dated December 29, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$15,129.48. Memo on bottom left of the check states "501(C)(3)".
24. Check #1391 dated December 30, 2016 from Chase Bank Epiphany's Treatment Center account # [REDACTED] payable to Pure Thoughts, INC for \$5,483.67. Memo on bottom left of the check states "501(C)(3)".

Continued review of Pure Thoughts, INC's Wells Fargo account # [REDACTED] (501(c)(3) equine/ horse rescue account) has revealed outgoing funds pertaining specifically to Pure Thoughts at Turtle Creek, INC's or "Epiphany's West" daily operations between the above-mentioned time frame (an 8 month span): Payments to individuals later identified as Pure Thoughts at Turtle Creek employees, rent payments for the associated sober homes, copious payments for leisure expenses (such as restaurants, club memberships, movie theaters, etc).

In summary, Jennifer Swanson and Bradley Allen Gaver:


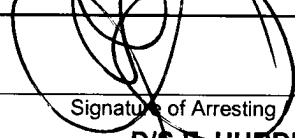
1. Referred patients to Epiphany's because Pure Thoughts at Turtle Creek did not have an active DCF license.
2. Were already paying for their own therapists prior to referring their patients to Epiphany's.
3. Were overseeing patients prior to referring them to Simeone/Epiphany's, and continued to treat and refer only those patients once they began working with Epiphany's.
4. Although T.S.'s name was on the leases for the sober homes on Folkestone Cir. during the time that Pure Thoughts at Turtle Creek was referring patients to Epiphany's, Swanson had control and final say in reference to anything related to the patients living there.
5. Pure Thoughts at Turtle Creek did not charge rent to patients with active insurance, so long as they attended treatment at Epiphany's.
6. Patients were not given a choice as to which treatment facility they attended while Pure Thoughts/Pure Thoughts at Turtle Creek was referring patients to Epiphany's.
7. Between May 31, 2016 through December 30, 2016, Epiphany's (Simeone) paid Pure Thoughts (Swanson and Gaver) \$207,939.12 for a percentage of each of Swanson and Gaver's patients' insurance reimbursements paid to Epiphany's for addiction treatment. In exchange, patients living in the Folkestone Cir. sober homes received free rent and/or favors by Swanson.
8. Although Gaver was not present for the formation of the referral agreement between Pure Thoughts at Turtle Creek and Epiphany's, he facilitated the majority of

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the group therapy sessions which took place at Epiphany's, and well as on Pure Thoughts at Turtle Creek's property before, during, and after the referral arrangement between Pure Thoughts at Turtle Creek and Epiphany's.

9. Between May 31, 2016 through December 30, 2016, Pure Thoughts at Turtle Creek treated patients who lived at their sober homes by providing group therapy which was later billed by Epiphany's. This therapy was provided by therapists who were employed prior to this time by Swanson and Gaver via Pure Thoughts.

Based on the above investigation, I find probable cause to charge Jennifer Swanson with 24 (twenty-four) counts of Patient Brokering in violation of FSS 817.505(1)(b), a third degree felony, which makes it unlawful for any person, including any health care provider or facility to: "Solicit or receive a commission, benefit, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, in return for referring a patient or patronage to or from a health care provider or health care facility" § 817.505(1)(b). Additionally, I find probable cause to charge Jennifer Swanson with one count of Conspiracy to Commit Patient Brokering with Epiphany's (Simeone) in violation of FSS 777.04(3)(d)(3), a third degree felony, which makes it unlawful to "agree, conspire, combine, or confederate with another person or persons to commit a Felony of the third degree" FSS 777.04(3)(d)(3). Additionally, I find probable cause to charge Jennifer Swanson and Bradley Allen Gaver (Pure Thoughts at Turtle Creek) with one count each of Acting as a Substance Abuse Provider while Unlicensed, in violation of FSS 397.401(1), a first degree misdemeanor, which makes it unlawful for "any person or agency to act as a substance abuse service provider unless it is licensed." Additionally, I find probable cause to charge Bradley Allen Gaver with 24 (twenty four) counts of Patient Brokering in violation of FSS 817.505(d), a third degree felony, which makes it unlawful for any person, including any health care provider or facility to: "Aid, abet, advise, or otherwise participate in" Patient Brokering FSS 817.505(d). Agents of TARGET ENTITIES commit a separate violation of section 817.505 every time they engage in patient brokering, despite the overall and ongoing agreement. See State v. Rubio, 967 So. 2d 768, 778 (Fla. 2007).

<p>Sworn and Subscribed before me</p>  <p>Signature Notary Public / Clerk of Court / Officer (F.S.S 117.10)</p> <p style="text-align: center;">INV. TED PADICH (SHTF)</p> <p>Name of Notary Public / Clerk of Court / Officer (F.S.S 117.10)</p> <p style="text-align: center;">11/8/2018</p> <p style="text-align: center;">Date</p>	 <p>Signature of Arresting / Investigating Officer</p> <p style="text-align: center;">D/S E. HURDLE #16030</p> <p>Name of Officer (Please Print)</p> <p style="text-align: center;">11/8/2018</p> <p style="text-align: center;">Date</p>
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