

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

STATE OF FLORIDA

vs.

MICHAEL J. HARPER, W/M, 07/22/1980,
[REDACTED]

CASE NO. 2019 CF 00 9582 AKXX
CRIMINAL DIVISION W
ISSUE CAPIAS

INFORMATION FOR:

- 1) PATIENT BROKERING
- 2) PATIENT BROKERING
- 3) PATIENT BROKERING
- 4) PATIENT BROKERING
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- 12) PATIENT BROKERING
- 13) PATIENT BROKERING
- 14) CONSPIRACY TO COMMIT PATIENT BROKERING

FILED
10 OCT 10 PM 3:31
CLERK
OFFICE OF CLERK

In the Name and by Authority of the State of Florida:

DAVID ARONBERG, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that:

COUNT 1: MICHAEL J. HARPER on or about October 14, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee

arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 2: MICHAEL J. HARPER on or about October 21, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 3: MICHAEL J. HARPER on or about October 31, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 4: MICHAEL J. HARPER on or about November 3, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 5: MICHAEL J. HARPER on or about November 15, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 6: MICHAEL J. HARPER on or about December 30, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 7: MICHAEL J. HARPER on or about November 18, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 8: MICHAEL J. HARPER on or about November 28, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 9: MICHAEL J. HARPER on or about December 14, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 10: MICHAEL J. HARPER on or about December 23, 2016, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)


COUNT 11: MICHAEL J. HARPER on or about January 18, 2017, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 12: MICHAEL J. HARPER on or about January 20, 2017, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 13: MICHAEL J. HARPER on or about January 23, 2017, in the County of Palm Beach and State of Florida, did unlawfully offer or pay JASON GADREULT a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or engage in any split-fee arrangement, in any form whatsoever, to induce the referral of patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(a) and (4) 777.011. (3 DEG FEL)

COUNT 14: MICHAEL J. HARPER on or between April 15, 2016 and January 23, 2017, in the County of Palm Beach and State of Florida, did unlawfully agree, conspire, combine or confederate with another person or persons including but not limited to JASON GADREULT to commit PATIENT BROKERING, a felony, and did unlawfully solicit or receive from MICHAEL J. HARPER a commission, bonus, rebate, kickback, or bribe, directly or indirectly, in cash or in kind, or did engage in any split-fee arrangement, in any form whatsoever, in return for referring patients or patronage to GENESIS DIAGNOSTICS AND/OR CERTUS LABORATORIES, contrary to Florida Statute 817.505(1)(b) and (4) and 777.04(3) 777.011. (3 DEG FEL)

DAVID ARONBERG
STATE ATTORNEY


By: J.D. SMALL
FL. BAR NO. 544922
Assistant State Attorney
Fifteenth Judicial Circuit

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, J.D. SMALL, Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.


Assistant State Attorney

Sworn to and subscribed to before me this 16TH day of October, 2019.



SARAH JUDITH GEORGE
Commission # GG 196116
Expires March 14, 2022
Bonded Thru Budget Notary Services


NOTARY PUBLIC, State of Florida

JS/sg

Citation Nos. (if applicable)

FCIC REFERENCE NUMBERS:

- 1) PATIENT BROKERING SAGES:2699 FDLE REC NO:2907
- 2) PATIENT BROKERING SAGES:2699 FDLE REC NO:2907
- 3) PATIENT BROKERING SAGES:2699 FDLE REC NO:2907
- 4) PATIENT BROKERING SAGES:2699 FDLE REC NO:2907
- 5) PATIENT BROKERING SAGES:2699 FDLE REC NO:2907
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- 13) PATIENT BROKERING SAGES:2699 FDLE REC NO:2907
- 14) PATIENT BROKERING SAGES:2699 FDLE REC NO:2907

NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING

Pursuant to Florida Rule of Judicial Administration 2.420(d)(2), the filer of this court record (Information) indicates that confidential information is included within the document being filed; to wit: Social Security Number, § 119.0714.