

**THE BROWARD COUNTY SCHOOL BOARD, FLORIDA**

ROBERT W. RUNCIE,  
Superintendent of Schools,

Petitioner,

v.

MICAH DEMETRIUS HARRELL,

Respondent.

\_\_\_\_\_ /

**ADMINISTRATIVE COMPLAINT**

Petitioner, Robert W. Runcie, Superintendent of Schools of Broward County, Florida ("Petitioner"), through his undersigned counsel, files this Administrative Complaint against Respondent, Micah Demetrius Harrell ("Harrell"). The Petitioner seeks termination of Respondent's employment with the Broward County School Board ("BCSB"). The Petitioner alleges the following:

**I. JURISDICTIONAL BASIS**

1. The agency is the School Board of Broward County, Florida, located at 600 Southeast Third Avenue, Fort Lauderdale, Broward County, Florida 33301.
2. The Petitioner is Robert W. Runcie, who is the Superintendent of Schools of Broward County, Florida.
3. The Petitioner is statutorily obligated to recommend the placement of school personnel and to require compliance and observance with all laws, rules, and regulations. Petitioner

is authorized to report and enforce any violation thereof, together with recommending the appropriate disciplinary action against any instructional personnel employed by the BCSB, inclusive of Harrell.

4. Harrell is an employee of the BCSB and is currently employed as a guidance counselor issued in accordance with Section 1012.33(3)(a) and/or 1012.335, Florida Statutes.
5. The last known address of Harrell is 6521 SW 63<sup>rd</sup> Avenue, Miami, Florida, 33143.

## **II. MATERIAL ALLEGATIONS**

6. This recommendation is based upon conduct occurring during the 2015/2016 school year.
7. Harrell is employed as a guidance counselor at Piper High School ("Piper").
8. The BCSB hired Harrell on or about September 20, 2004.
9. On or about January 25, 2016, Orange County Circuit Judge Julie H. O'Kane, in and for the Ninth Judicial Circuit of Florida, issued an arrest warrant for Harrell for the felony crimes of:
  - A. (1) Medicaid Provider Fraud;
  - B. (2) Conspiracy to Commit Medicaid Fraud;
  - C. (3) Organized Scheme to Defraud; and

D. (4) Criminal Use of Personal Identification Information.

Please see Warrant for Arrest attached hereto as Exhibit

"A."

10. On or about April 6, 2017, the State of Florida filed a thirty-three (33) count Amended Information against Harrell to include the felony charges of Organized Scheme to Defraud, Criminal Use of Personal Identification of Minors and Medicaid Fraud Against Minors.

Please see Amended Information attached hereto as Exhibit

"B."

11. On or about April 3, 2018, Harrell pled nolo contendere to one count of Organized Fraud - a second degree felony punishable by up to fifteen (15) years in the Department of Corrections.

Please see the Plea Agreement attached hereto as Exhibit "C."

Please see Judgment attached hereto as Exhibit "D."

12. As part of the plea agreement, adjudication was withheld and Harrell was sentenced to one (1) year of Community Control, followed by a term of ten (10) years of probation. Please see Exhibit "C." This is undisputed.

13. As part of his plea agreement with the State of Florida, Harrell had the special conditions of no work which results in the billing of Medicaid and **"no access to the personal ID**

information of unrelated minors" while on probation. Please see Exhibit "C." This is undisputed.

14. As part of his plea agreement, Harrell agreed to an Order of Restitution as a Condition of Probation where he would pay back \$42,000.00 to the Office of the Attorney General. Please see Order for Restitution attached hereto as Exhibit "E."
15. There are no material facts in dispute.

### III. ADMINISTRATIVE CHARGES

16. Petitioner realleges and incorporates herein by reference the allegations set forth in paragraphs one (1) through fifteen (15), above.
17. Just cause exists for the requested relief pursuant to Sections 1012.33(1)(a), 1012.335, Fla. Stat., Section 435.04, Fla. Stat., Section 6A-5.056, F.A.C., the Respondent's employment contract, BCSB rules and regulations, the Code of Ethics of the Education Profession, and the policies promulgated by the BCSB.
18. "Just cause" means cause that is legally sufficient. Pursuant to Section 6A-5.056 F.A.C., "just cause" includes, **but is not limited to** incompetency. "Incompetency" means the **inability**, failure or lack of fitness to discharge the required duty as a result of inefficiency or incapacity. (Emphasis added).

1. "Inefficiency" means one or more of the following:

- a. Failure to perform duties prescribed by law;

\* \* \*

**IV. JUST CAUSE FOR DISCIPLINE**

**A. JUST CAUSE**

- 19. Respondent's actions constitute just cause to terminate his employment with the BCSB.

**B. INCOMPETENCY**

- 20. Respondent's actions constitute incompetency. The Respondent, through his above-described conduct and plea agreement with the State of Florida has violated Florida Statute §1012.33 and Rule 6A-5.056(3)(a) of the Florida Administrative Code. His actions show a failure to perform the required duties as a result of inefficiency, as follows:

- 1. "Inefficiency" means one or more of the following:

- a. Failure to perform duties prescribed by law;

\* \* \*

- 21. As a result of the plea agreement Harrell is prohibited from having any access to non-related minor's identification information. This is undisputed.

- 22. As such, Harrell is prohibited from legally accessing BCSB information, data, or computers to view or access any non-

related minor's personal identification information. This is undisputed.

23. Accordingly, Harrell has demonstrated an inability to discharge his required duty as a result of incompetency, inefficiency or incapacity, and therefore, has failed to perform his duties as a guidance counselor as he may not have access to non-related minor's identification information.

**DEMAND FOR RELIEF**

WHEREFORE, based upon the foregoing, Petitioner, Robert W. Runcie, Superintendent of Schools, recommends that the BCSB terminate the Respondent, Micah Demetrius Harrell, based upon the foregoing facts and legal authority.

EXECUTED this 19th day of May, 2020.



ROBERT W. RUNCIE,  
Superintendent of Schools,  
Broward County

Respectfully submitted:  
Andrew Brett Carrabis, Esq.  
Administrative Counsel

## NOTICE

If you wish to contest the charges, you must, within 15 calendar days after receipt of the written notice, submit a written request for a hearing to Robert W. Runcie, Superintendent, Broward County School District, 600 3<sup>rd</sup> Ave., Ft. Lauderdale, FL, 33301. If timely requested, such hearing shall be conducted, at the School Board's election, in accordance with one of the following procedures:

1. A direct hearing conducted by the district school board within 60 days after receipt of the written appeal; or

2. A hearing conducted by an administrative law judge assigned by the Division of Administrative Hearings of the Department of Management Services.

The hearing shall be conducted within 60 days after receipt of the written appeal in accordance with chapter 120, Florida Statutes.

FAILURE TO TIMELY REQUEST A HEARING WILL RESULT IN A WAIVER OF THE RIGHT TO CONTEST THE CHARGES.

IF YOU WANT TO HIRE AN ATTORNEY, YOU HAVE THE RIGHT TO BE REPRESENTED BY AN ATTORNEY IN THIS MATTER.

**EXHIBIT A**

1/28/2016 8:38 AM FILED IN OFFICE OF TIFFANY M. RUSSELL, CLERK OF COURTS, ORANGE CO. FL Page 1

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE COUNTY, FLORIDA

**WARRANT FOR ARREST**

COURT CASE NO: 2016- CF - 1171 12

IN THE NAME OF THE STATE OF FLORIDA TO ALL AND SINGULAR LAW ENFORCEMENT INVESTIGATORS OF THE ATTORNEY GENERAL'S OFFICE; SPECIAL AGENTS OF THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT; SHERIFFS OF THE STATE OF FLORIDA AND/OR POLICE CHIEFS OF LOCAL MUNICIPALITIES.

You are commanded to arrest:



**Micah Harrell**

DOB: 04/09/1970  
ADDRESS: 6521 SW 63<sup>rd</sup> Ave.  
South Miami, FL 33143  
DL: Florida H640 544 70 129 0  
SSN: [REDACTED]  
Physical: 6'1", 250 lbs, Blk/Brn, B/M

Based upon the Affidavit presented in this cause by Law Enforcement Investigator Thomas Cronin of the OFFICE OF THE ATTORNEY GENERAL, Medicaid Fraud Control Unit (MFCU), the Court finds that there is probable cause to believe that the above-named defendant has committed, in Orange County, Florida, the following crime in violation of the below-listed statutes and against the peace and dignity of the State of Florida:

**Count 1: Medicaid Provider Fraud (F1), F.S.S. 409.920(2)(a)(1) & 409.920(2)(b)1c**

**Count 2: Conspiracy to Commit Medicaid Fraud (F2), F.S.S. 770.04, 409.920(2)(a)1 & 409.920(2)(b)1c**

**Count 3: Organized Scheme to Defraud (F1), F.S.S. 817.034(4)(a)(2)**

**Count 4: Criminal Use of Personal Identification Information (F1), F.S.S.817.568(2)(c)**

Page 1 of 2

You are to bring him before me to answer a complaint charging her with same.  
The Defendant is to be admitted to bail in the sum of:

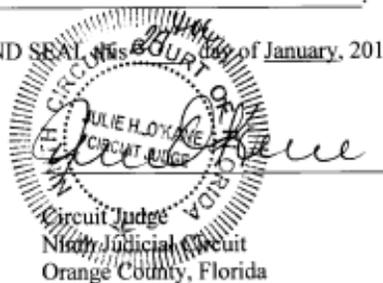
\$ 100,000<sup>00</sup> as to Count 1;  
\$ 50,000<sup>00</sup> as to Count 2;  
\$ 25,000<sup>00</sup> as to Count 3.  
\$ 25,000<sup>00</sup> as to Count 4:  
\$200,000<sup>00</sup> - **Total Bond Amount**

With the following specials conditions of bond: *(check all that apply)*

- satisfy the *Nebbia* condition in this matter prior to release;
- surrender any passport to the Clerk of Court prior to release;
- not travel outside of Orange County, Florida until further order of this Court;
- submit to supervision by the Orange County Pretrial Services unit;
- have no contact, directly or indirectly, with any codefendants or state witnesses;
- possess no firearms or weapons; and
- other: \_\_\_\_\_

GIVEN UNDER MY HAND AND SEAL, this 28th day of January, 2016 at

Orange County, Florida.



**EXHIBIT B**

Filing # 54756925 E-Filed 04/06/2017 04:13:02 PM

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,	COURT CASE NO.: 2016-CF-1171-A-O
	2016-CF-1171-B-O
Plaintiff,	
v.	Div.: 12
MICAH HARRELL	
KEITH DALY	
Defendant(s).	

\_\_\_\_\_ /

**AMENDED INFORMATION**

**COUNT 1- ORGANIZED SCHEME TO DEFRAUD (\$50,000 or More) as to Defendant A Only**  
Fla. Stat. §§ 817.034(4)(a)1 and 777.011  
First Degree Felony – Level 7

**COUNT 2- ORGANIZED SCHEME TO DEFRAUD (\$20,000 or more, but less than \$50,000) as to Defendant B Only**  
Fla. Stat. §§ 817.034(4)(a)2 and 777.011  
Second Degree Felony – Level 6

**COUNT 3- CONSPIRACY TO COMMIT MEDICAID FRAUD FALSE PROVIDER INFORMATION IN A PROVIDER APPLICATION (\$10,000 or more, but less than \$50,000) as to Defendant B Only**  
Fla. Stat. §§ 409.920(2)(a)6, 409.920(2)(b)1b and 777.04  
Third Degree Felony – Level 6

**COUNT 4- MEDICAID FRAUD: FALSE STATEMENT IN PROVIDER APPLICATION (More than \$10,000, but less than \$50,000) as to Defendants B Only**  
Fla. Stat. §§ 409.920(2)(a)6 and 409.920(2)(b)1b  
Second Degree Felony-Level 7

**COUNT 5-PERJURY BY FALSE WRITTEN DECLARATION as to Defendant B Only**  
Fla. Stat. §§ 92.525(3)  
Third Degree Felony-Level 1

**COUNT 6-PERJURY IN OFFICIAL PROCEEDINGS as to Defendant B Only**  
Fla. Stat. §§ 837.02(1)  
Third Degree Felony-Level 4

**COUNT 7 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (C.W., DOB: 04/29/2005 A Minor) As to Defendant A only**  
Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 8 -MEDICAID FRAUD: FALSE CLAIMS (C.W., DOB: 04/29/2005, A Minor) as to Defendants A Only**  
Fla. Stat. §§ 409.920(2)(a)1 and 409.920(2)(b)1a  
Third Degree Felony-Level 7

**COUNT 9 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (D.J., A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 10 -MEDICAID FRAUD:FALSE CLAIMS (D.J., A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 11 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (J.S., A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 12 -MEDICAID FRAUD:FALSE CLAIMS (J.S., A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 13 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (K.W., A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 14 -MEDICAID FRAUD:FALSE CLAIMS (K.W., A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 15 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (I.C., A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 16 -MEDICAID FRAUD:FALSE CLAIMS (I.C., A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 17 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (J.C., A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 18 -MEDICAID FRAUD:FALSE CLAIMS (J.C., A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 19 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (E.F., DOB: 07/24/2003, A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 20 -MEDICAID FRAUD:FALSE CLAIMS (E.F., DOB: 07/24/2003, A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

COUNT 21 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (E.F., DOB: 08/22/2003, A Minor) As to Defendant A Only

Fla. Stat. §§ 817.568(6)

Second Degree Felony-Level 8

COUNT 22 -MEDICAID FRAUD:FALSE CLAIMS (E.F., DOB: 08/22/2003, A Minor) as to Defendants A Only

Fla. Stat. §§ 409.920(2)(a)I and 409.920(2)(b)Ia

Third Degree Felony-Level 7

COUNT 23 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (E.F., DOB: 12/22/2005, A Minor) As to Defendant A Only

Fla. Stat. §§ 817.568(6)

Second Degree Felony-Level 8

COUNT 24 -MEDICAID FRAUD:FALSE CLAIMS (E.F., DOB: 12/22/2005, A Minor) as to Defendants A Only

Fla. Stat. §§ 409.920(2)(a)I and 409.920(2)(b)Ia

Third Degree Felony-Level 7

COUNT 25 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (J.S., A Minor) As to Defendant A Only

Fla. Stat. §§ 817.568(6)

Second Degree Felony-Level 8

COUNT 26 -MEDICAID FRAUD:FALSE CLAIMS (J.S., A Minor) as to Defendants A Only

Fla. Stat. §§ 409.920(2)(a)I and 409.920(2)(b)Ia

Third Degree Felony-Level 7

COUNT 27 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (D.J., A Minor) As to Defendant A Only

Fla. Stat. §§ 817.568(6)

Second Degree Felony-Level 8

COUNT 28 -MEDICAID FRAUD: FALSE CLAIMS (D.J., A Minor) as to Defendants A Only

Fla. Stat. §§ 409.920(2)(a)I and 409.920(2)(b)Ia

Third Degree Felony-Level 7

COUNT 29 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (C.W., DOB: 06/15/2006, A Minor) As to Defendant A Only

Fla. Stat. §§ 817.568(6)

Second Degree Felony-Level 8

COUNT 30 -MEDICAID FRAUD: FALSE CLAIMS (C.W., DOB: 06/15/2006 A Minor) as to Defendants A Only

Fla. Stat. §§ 409.920(2)(a)I and 409.920(2)(b)Ia

Third Degree Felony-Level 7

COUNT 31 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (C.W., DOB: 12/13/2007 A Minor) As to Defendant A Only

Fla. Stat. §§ 817.568(6)

Second Degree Felony-Level 8

**COUNT 32 -MEDICAID FRAUD: FALSE CLAIMS (C.W., DOB: 12/13/20017, A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 33 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (M.W., DOB: 01/05/2010, A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 34 -MEDICAID FRAUD: FALSE CLAIMS (M.W.,DOB: 01/05/2010 A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 35 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (M.W., DOB: 09/06/2005 , A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 36 -MEDICAID FRAUD: FALSE CLAIMS (M.W.,DOB: 09/06/2005, A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**COUNT 37 - CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION (L.T., A Minor) As to Defendant A Only**

Fla. Stat. §§ 817.568(6)  
Second Degree Felony-Level 8

**COUNT 38 -MEDICAID FRAUD: FALSE CLAIMS (L.T., A Minor) as to Defendants A Only**

Fla. Stat. §§ 409.920(2)(a)l and 409.920(2)(b)la  
Third Degree Felony-Level 7

**IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA**

**COUNT 1(DEFENDANT A ONLY)  
ORGANIZED SCHEME TO DEFRAUD (\$50,000 or More)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 1, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there engage in a systematic, ongoing course of conduct, with intent to obtain property from one or more persons, to wit: the State Medicaid Program or its fiscal agent; by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act with intent to defraud one or more persons, to wit: the State of Florida Agency for Health Care Administration or its fiscal agent; and the Defendant did obtain, endeavor to obtain, or attempt to obtain said property valued at \$50,000 or More to wit: United States currency and/or Medicaid reimbursements; contrary to Statutes Sections 817.034(4)(a)l of Florida Statutes.

**COUNT 2 (DEFENDANT B ONLY)**  
**ORGANIZED SCHEME TO DEFRAUD**  
**(\$20,000 or More, but less than \$50,000)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about August 11, 2013 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; KEITH DALY did then and there engage in a systematic, ongoing course of conduct, with intent to obtain property from one or more persons, to wit: the State Medicaid Program or its fiscal agent; by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act with intent to defraud one or more persons, to wit: the State of Florida Agency for Health Care Administration or its fiscal agent; and the Defendant did obtain, endeavor to obtain, or attempt to obtain said property valued at \$20,000 or More, but less than \$50, 000 to wit: United States currency and/or Medicaid reimbursements; contrary to Statutes Sections 817.034(4)(a)2 of Florida Statutes.

**COUNT 3 (DEFENDANT B ONLY)**  
**CONSPIRACY TO COMMIT MEDICAID FRAUD: FALSE STATEMENT IN A PROVIDER APPLICATION**  
**(\$10,000 or More, But less than \$50,000)**

ARAMIS D. AYALA, State Attorney for the Ninth Judicial Circuit prosecuting for the State of Florida in Orange County, by and through the undersigned designated Assistant State Attorney, under oath, charges that on or about August 11, 2013 and continuing through January 29, 2016 in the Ninth Circuit of Florida, to wit: Orange County, Florida; KEITH DALY did, with the intent that Medicaid Provider Fraud: False Statement in a Provider Application to be committed, agree, conspire, combine, or confederate together with each other, or with other persons either known or unknown, to cause, Medicaid Provider Fraud: False Statement in a Provider Application to be committed either by them, or one of them, or by some other person; and in furtherance of the conspiracy did knowingly submit false or misleading information to the Medicaid Program, to wit the Agency for Health Care Administration, or its fiscal agent or a managed care plan, for the purpose of being accepted as a Medicaid provider, and the Defendant received or endeavored to receive anything of value to wit: More than \$10,000, but less than \$50, 000 in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a)6 and 409.920(2)(b)1b.

**COUNT 4 (DEFENDANT B ONLY)**  
**MEDICAID FRAUD: FALSE STATEMENT IN A PROVIDER APPLICATION**  
**(More than \$10,000, but Less than \$50,000)**

ARAMIS D. AYALA, State Attorney for the Ninth Judicial Circuit prosecuting for the State of Florida in Orange County, by and through the undersigned designated Assistant State Attorney, under oath, charges that on or about August 11, 2013 and continuing through January 29, 2016 in the Ninth Circuit of Florida, to wit: Orange County, Florida, the Defendant, KEITH DALY did knowingly submit false or misleading information to the Medicaid Program, to wit the Agency for Health Care Administration, or its fiscal agent or a managed care plan, for the purpose of being accepted as a Medicaid provider, and the Defendant received or endeavored to receive anything of value to wit: More than \$10,000, but less than \$50, 000 in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a)6 and 409.920(2)(b)1b.

**COUNT 5 (DEFENDANT B ONLY)**  
**PERJURY BY FALSE WRITTEN DECLARATION**

ARAMIS D. AYALA for the Ninth Judicial Circuit prosecuting for the State of Florida in Orange County, by and through the undersigned designated Assistant State Attorney, under oath, charges that on or about April 21, 2015 and continuing through June 3, 2015, in the Ninth Circuit of Florida, to wit: Orange County, Florida the Defendant KEITH DALY did make a false written declaration, and that the false statement was made under oath in an verified document, to wit: Bankruptcy Schedules, contrary to Florida Statutes section 92.525(3).

**COUNT 6 (DEFENDANT B ONLY)**  
**PERJURY IN OFFICIAL PROCEEDINGS**

ARAMIS D. AYALA for the Ninth Judicial Circuit prosecuting for the State of Florida in Orange County, by and through the undersigned designated Assistant State Attorney, under oath, charges that on or about May 25, 2015 in the Ninth Circuit of Florida, to wit: Orange County, Florida the Defendant KEITH DALY did make a false statement, which he did not believe to be true, and that the false statement was made under oath in an official proceeding, to wit: Bankruptcy Trustee Meeting, and was made in regards to a material matter, contrary to Florida Statutes section 837.02.

**COUNT 7 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(C.W., DOB: 04/29/2005, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning C.W., DOB: 04/29/2005 who, at the time, was a minor, and did so without first obtaining the consent of C.W., DOB: 04/29/2005, or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 8 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (C.W., DOB: 04/29/2005, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning C.W., DOB: 04/29/2005 A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a)l and 409.920(2)(b)l a.

**COUNT 9 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(D.J., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning D.J., who, at the time, was a minor, and did so without first obtaining the consent of D.J., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 10 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (D.J., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning D.J., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 11 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(J.S., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning J.S., who, at the time, was a minor, and did so without first obtaining the consent of J.S., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 12 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (J.S., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning J.S., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 13 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(K.W., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning K.W., who, at the time, was a minor, and did so without first obtaining the consent of K.W., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 14 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (K.W., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning K.W., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 15 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(I.C., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning I.C., who, at the time, was a minor, and did so without first obtaining the consent of I.C., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 16 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (I.C., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning I.C., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 17 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(J.C., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning J.C., who, at the time, was a minor, and did so without first obtaining the consent of J.C., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 18 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (J.C., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning J.C., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 19 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(E.F., DOB: 07/24/2003, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning E.F., DOB: 07/24/2003 who, at the time, was a minor, and did so without first obtaining the consent of E.F., DOB: 07/24/2003 or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 20 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (E.F., DOB: 07/24/2003, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning E.F., DOB: 07/24/2003, A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a

**COUNT 21 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(E.F., DOB: 08/22/2003, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning E.F., DOB: 08/22/2003 who, at the time, was a minor, and did so without first obtaining the consent of E.F., DOB: 08/22/2003 or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 22 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (E.F., DOB: 08/22/2003, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL. Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning E.F., DOB: 08/22/2003, A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 23 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(E.F., DOB: 12/22/2005, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning E.F., DOB: 12/22/2005 who, at the time, was a minor, and did so without first obtaining the consent of E.F., DOB: 12/22/2005 or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 24 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (E.F., DOB: 12/22/2005, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL. Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning E.F., DOB: 12/22/2005, A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 25 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(J.S., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning J.S., who, at the time, was a minor, and did so without first obtaining the consent of J.S., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 26 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (J.S., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning J.S., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 27 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(D.J., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning D.J., who, at the time, was a minor, and did so without first obtaining the consent of D.J., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 28 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (D.J., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning D.J., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 29 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(C.W., DOB: 06/15/2006, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning C.W., DOB: 06/15/2006 who, at the time, was a minor, and did so without first obtaining the consent of C.W., DOB:06/15/2006 or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 30 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (C.W., DOB: 06/15/2006, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning C.W., DOB: 06/15/2006 A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 31 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(C.W., DOB: 12/13/2007, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning C.W., DOB: 12/13/2007 who, at the time, was a minor, and did so without first obtaining the consent of C.W., DOB:12/13/2007 or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 32 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (C.W., DOB: 12/13/2007, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning C.W., DOB: 12/13/2007 A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 33 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(M.W., DOB: 01/05/2010, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning M.W., DOB: 01/05/2010 who, at the time, was a minor, and did so without first obtaining the consent of M.W., DOB: 01/05/2010 or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 34 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (M.W., DOB: 01/05/2010, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL. Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning M.W., DOB:01/05/2010, A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 35 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(M.W., DOB: 09/06/2005, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning M.W., DOB: 09/06/2005 who, at the time, was a minor, and did so without first obtaining the consent of M.W., DOB: 09/06/2005 or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 36 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (M.W., DOB:09/06/2005, A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL. Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning M.W., DOB: 09/06/2005, A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

**COUNT 37 (DEFENDANT A ONLY)**  
**CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION**  
**(L.T., A Minor)**

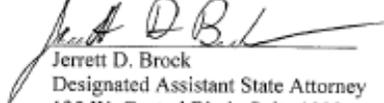
ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL did then and there willfully and without authorization fraudulently use personal identification information; to wit: Medicaid number; concerning L.T., who, at the time, was a minor, and did so without first obtaining the consent of L.T., or his or her legal guardian, contrary to Statutes Section 817.568(6) of Florida Statutes.

**COUNT 38 (DEFENDANT A ONLY)**  
**MEDICAID FRAUD: FALSE CLAIMS (L.T., A Minor)**

ARAMIS D. AYALA, State Attorney for the State of Florida, by and through the undersigned Designated Assistant State Attorney, under oath, charges that, beginning on or about January 01, 2014 and continuing through January 29, 2016 in the Ninth Circuit, to wit: Orange County, Florida; MICAH HARRELL Knowingly make, cause to be made, or aid and abet in the making of any false statement or false representation of a material fact, by commission or omission, in any claim concerning L.T., A Minor, submitted to the agency or its fiscal agent or a managed care plan for payment and by which crime the Defendant received or endeavored to receive anything of value, to wit: Ten Thousand and no/100 Dollars (\$10,000) or less in United States currency or proceeds of Medicaid Claims, contrary to Florida Statute sections 409.920(2)(a) and 409.920(2)(b) a.

This information encompasses the transaction and all charges listed on Complaint Numbers 48-2016-CF-001171-A-O, 48-2016-CF-001171-B-O. The Orange County Sheriff's Office and the Orange County Corrections Department shall substitute the charges indicated on this information for those on the above cited complaint. The bonds shall remain the same as last set on 48-2016-CF-001171-A-O, 48-2016-CF-001171-B-O.

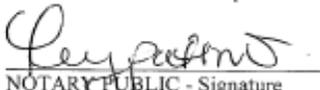
ARAMIS D. AYALA, State Attorney  
Ninth Judicial Circuit of Florida

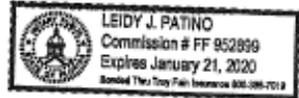
  
Jerrett D. Brock  
Designated Assistant State Attorney  
135 W. Central Blvd., Suite 1000  
Orlando, Florida 32801  
(407) 999-5588  
Fla. Bar No.: 0022369

STATE OF FLORIDA  
COUNTY OF ORANGE

Before me, the undersigned authority, personally appeared Jerrett D. Brock, Designated Assistant State Attorney, who, first being 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 offenses therein charged, that the prosecution is instituted in good faith, and certifies that testimony was received under oath from the material witness or witnesses for the offenses.

Sworn to and subscribed before me  
This 06 day of April 2017.

  
NOTARY PUBLIC - Signature  
Personally known to Notary.



NOTARY PUBLIC - Printed Name

**EXHIBIT C**

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE / OSCEOLA COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO. 16-CF-1171-A-0

v.  
MICAH HANCOCK Defendant.

DIVISION: 12

FILED IN OPEN COURT 4/3/18  
Clerk, Cir. Ct., Orange Co., FL

PLEA (S) FORM By [Signature] D.C.

1. PLEA: I, Micah Hancock Defendant, withdraw my plea(s) of not guilty and enter plea(s) of:  
Count 1 ( ) Guilty ( ) Nolo Contendre to ( ) as charged ( ) lesser Organized Fraud  
L10 Degree 2nd F.S. 817.034(4)(a) Maximum Sentence 15 years Min.Man. \_\_\_\_\_  
Count \_\_\_\_\_ ( ) Guilty ( ) Nolo Contendre to ( ) as charged ( ) lesser \_\_\_\_\_  
Degree \_\_\_\_\_ F.S. \_\_\_\_\_ Maximum Sentence \_\_\_\_\_ Min.Man. \_\_\_\_\_  
Count \_\_\_\_\_ ( ) Guilty ( ) Nolo Contendre to ( ) as charged ( ) lesser \_\_\_\_\_  
Degree \_\_\_\_\_ F.S. \_\_\_\_\_ Maximum Sentence \_\_\_\_\_ Min.Man. \_\_\_\_\_  
Count \_\_\_\_\_ ( ) Guilty ( ) Nolo Contendre to ( ) as charged ( ) lesser \_\_\_\_\_  
Degree \_\_\_\_\_ F.S. \_\_\_\_\_ Maximum Sentence \_\_\_\_\_ Min.Man. \_\_\_\_\_  
Count \_\_\_\_\_ ( ) Guilty ( ) Nolo Contendre to ( ) as charged ( ) lesser \_\_\_\_\_  
Degree \_\_\_\_\_ F.S. \_\_\_\_\_ Maximum Sentence \_\_\_\_\_ Min.Man. \_\_\_\_\_  
Count \_\_\_\_\_ ( ) Guilty ( ) Nolo Contendre to ( ) as charged ( ) lesser \_\_\_\_\_  
Degree \_\_\_\_\_ F.S. \_\_\_\_\_ Maximum Sentence \_\_\_\_\_ Min.Man. \_\_\_\_\_  
Count \_\_\_\_\_ ( ) Guilty ( ) Nolo Contendre to ( ) as charged ( ) lesser \_\_\_\_\_  
Degree \_\_\_\_\_ F.S. \_\_\_\_\_ Maximum Sentence \_\_\_\_\_ Min.Man. \_\_\_\_\_

2. PROMISES/RECOMMENDATIONS: No one has promised me anything to get me to enter the plea(s) except as stated herein.

A. The prosecutor and I have agreed to the following: W/H of Adj.  
1 year Community Control followed by 10 years probation  
\$42,000 in restitution to the State  
~~The prosecutor has recommended the following:~~ Special conditions:  
1) No work which results in billing Medicaid.  
2) No work which results in access to the personal ID info of  
C. The Judge has promised: unrelated minors

3. PENALTIES: I understand the total maximum penalties for the crime(s) to be 15 years plus total maximum fine(s) of \$ 10,000.00 plus court costs, fees, costs, costs of investigation, and restitution. \_\_\_\_\_ (Defendant's Initials)

4. TRIAL RIGHTS: I understand that if the Court accepts my plea(s), I give up my right to: (1) a trial by jury; (2) have a jury determine whether I am guilty or not guilty; (3) see and hear the witnesses testify, and to have my attorney(s) question them for me; (4) subpoena and present witnesses and items of evidence in my defense, and to present any defense I might have to the jury; (5) testify or to remain silent; and (6) require the prosecutor to prove my guilt by admissible evidence beyond a reasonable doubt before I can be found guilty.  
MH (Defendant's Initials)

\_\_\_\_\_, Defendant

CASE NO. \_\_\_\_\_

5. **PLEA UNDERSTANDING:** I understand that a plea of Guilty admits that I committed the crime(s) and a plea of Nolo Contendere says that I do not contest the evidence against me. I understand that if the Court accepts my plea(s) there will be no trial and the Court will impose sentence(s) based upon my plea(s). \_\_\_\_\_(Defendant's Initials)

6. **CHARGES, DEFENSES, PENALTIES:** I have read the Information/Indictment in this case and I understand the charge(s) to which I enter my plea(s). I have reviewed the evidence against me. I know of no physical evidence containing DNA which could exonerate me. My attorney(s) has/have explained to me the maximum penalties for the charge(s), the essential elements of the crime(s), and possible defenses to the crime(s). I understand these things. I also understand that if I am on probation/community control/parole, my probation/community control/parole can be revoked and I can receive a separate sentence up to the maximum on the probation/community control/parole charge in addition to the sentence imposed in the present case(s). \_\_\_\_\_(Defendant's Initials)

7. **VOLUNTARINESS:** No one has pressured, forced, threatened, or coerced me to enter the plea(s). I am entering the plea(s) because:  I believe I am guilty or  I believe that it is in my best interest. I enter the plea(s) voluntarily of my own free will. \_\_\_\_\_(Defendant's Initials)

8. **DEPORTATION:** I understand that if I am not a citizen of the United States, I WILL be deported. I have also had a meaningful opportunity to consult with an attorney(s) regarding deportation. I understand that no attorney(s) nor judge can advise/guarantee that I will or will not be deported. \_\_\_\_\_(Defendant's Initials)

9. **EDUCATION:** The highest grade/education I have completed: college  
I read and write  English  \_\_\_\_\_ I  read  was read this Plea Form by \_\_\_\_\_(Defendant's Initials)

10. **COMPETENCY:** At the present time, I am not under the influence of any drugs, alcohol, medication, or narcotics. I  am  am not presently taking any medication. I am presently taking the following medication: \_\_\_\_\_ The medication  does  does not affect my ability to concentrate or to think clearly. I am not suffering from any physical or mental problems that would affect my understanding of these proceedings. \_\_\_\_\_(Defendant's Initials)

11. **ENHANCED SENTENCE:** I understand that the State of Florida  is  is not seeking an enhanced sentence as \_\_\_\_\_ for which the Court may impose a sentence of \_\_\_\_\_(Defendant's Initials)

12. **PRISON RELEASEE REOFFENDER:** I understand that I will be sentenced to the statutory maximum unless the Court can give me a greater sentence if I am entering a plea(s) of Guilty/Nolo Contendere to an offense(s) enumerated in F.S. 775.082(9)(a)1. and (1) the offense(s) was committed within three years of my release from a state correctional facility operated by the Department of Corrections or a private vendor or from a correctional institution of another state, the District of Columbia, the United States, or any foreign jurisdiction; (2) the offense(s) was committed while serving a prison sentence in one of the aforementioned facilities; or (3) the offense(s) was committed while on escape status. \_\_\_\_\_(Defendant's Initials)

13. **CRIMINAL PUNISHMENT CODE:** I understand that my sentence will be imposed pursuant to Florida Law and the Criminal Punishment Code Scoresheet (CPCS). The CPCS will be prepared and is based upon the offense(s) that I am entering plea(s) and my prior criminal record. I understand that I will not be permitted to withdraw my plea(s) if the correct CPCS at my sentencing is other than what is presumed at this time. I understand that the CPCS only suggests a minimum sentence and the Court can sentence me to any lawful sentence. I understand that if my Total Sentence Points are greater than or equal to 363, a life sentence may be imposed by the Court for any felony offense. I understand that my maximum sentence is up to the statutory maximum unless the Lowest Permissible Prison Sentence in Months exceeds the statutory maximum. No one has promised me that the Court will depart from the CPCS. \_\_\_\_\_(Defendant's Initials)

DMH 14. **TIME SERVED:** I agree the correct amount of time served that I am entitled to is \_\_\_\_\_(Defendant's Initials)

\_\_\_\_\_, Defendant

CASE NO. \_\_\_\_\_

15. **EARLY RELEASE:** I understand that I may serve every day of my sentence. No one has promised that I will be released prior to the expiration of my sentence nor that I will receive any good and gain time. \_\_\_\_\_(Defendant's Initials)

16. **ATTORNEY FEES:** I do ( )not waive ( )waive my right to a hearing, and I agree that \$ \_\_\_\_\_ is a reasonable sum to pay for the services of my court appointed attorney(s). \_\_\_\_\_(Defendant's Initials)

17. **CIVIL COMMITMENT:** I understand that if I am entering a plea(s) of Guilty/Nolo Contendere to a sexually motivated offense or if I have been previously convicted of a sexually motivated offense, this plea(s) may subject me to involuntary civil commitment as a sexually violent predator upon completion of my sentence. \_\_\_\_\_(Defendant's Initials)

18. **DRIVER'S LICENSE:** I understand that if I am entering a plea(s) of Guilty/Nolo Contendere to an offense for which automatic, mandatory, or discretionary driver's license/privilege suspension or revocation is required or discretionary by law to be imposed by the Court or by a separate agency, this plea(s) will provide the basis for the suspension or revocation of my driver's license/privilege. I understand that if I am entering a plea(s) of Guilty/Nolo Contendere to a traffic offense I may be declared a Habitual Traffic Offender. \_\_\_\_\_(Defendant's Initials)

19. **SUPERVISION TOLLING AND COSTS:** I understand that while I am incarcerated my probation/community control/parole is tolled unless ordered otherwise by the Court. I understand that if I am placed on probation/community control/parole I will be required to pay costs of supervision. \_\_\_\_\_(Defendant's Initials)

20. **DNA:** I understand that the Court will order me to submit to a DNA sample. \_\_\_\_\_(Defendant's Initials)

21. **SENTENCING DATE:** I understand that if the Court permits me to remain at liberty pending my Sentencing I will comply with the following conditions: (1) show up on time on the date that Sentencing is set; (2) not violate any conditions of my release; (3) not violate any law; (4) all requests of the Department of Corrections to complete a Pre-Sentence Investigation report (if required); and (5) notify immediately any change in my address or telephone number to the Clerk of Court, bonds person, and my attorney(s). I understand that if I violate any of the aforementioned conditions I will not be allowed to set aside my plea(s) and the Court may sentence me to the total maximum penalties indicated in Paragraph 3. \_\_\_\_\_(Defendant's Initials)

22. **COLLECTIONS COURT:** I understand that if my financial obligations are referred to the Collections Court Program for collection that any failure to comply with the Collection Court Program requirements will result in the suspension of my driving privilege, a writ of bodily attachment being issued, and my case being sent to a Collection Agency to collect the Court Fines and Costs. \_\_\_\_\_(Defendant's Initials)

23. **HEARING PRESENCE:** I ( ) waive ( ) do not waive my right to be present at any Restitution/Attorney(s) Fee/Cost Hearing. \_\_\_\_\_(Defendant's Initials)

24. **SEAL/EXPUNGEMENT:** No one has promised me that this case(s) will be sealed or expunged. \_\_\_\_\_(Defendant's Initials)

25. **APPEAL:** I understand that I have thirty (30) days to file an appeal of in writing of the Court's Judgment and Sentence to the Clerk of Court. I understand that if I cannot afford an attorney one will be appointed to represent me. My attorney(s) has/have explained to me what an appeal is. By entering this plea, I understand that I give up my right to appeal all matters except (1) the legality of my sentence; (2) this Court's authority to hear this case; and (3) any pre-trial ruling for which I have reserved the right to appeal, and for which this Court has made a finding that controls an issue in this case. \_\_\_\_\_(Defendant's Initials)

26. **DEFENDANT'S CERTIFICATION:** I have read every word in this Plea(s) form, have discussed the contents with my attorney(s), and fully understand it. I am fully satisfied with the way my attorney(s) has/have handled this case for me. My attorney(s) has/have done everything I have asked him/her to do. \_\_\_\_\_(Defendant's Initials)

\_\_\_\_\_, Defendant

CASE NO. \_\_\_\_\_

**SWORN TO, SIGNED, AND FILED IN OPEN COURT** in the presence of defense counsel and the Judge  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

Orange / Osceola  
Clerk of the Circuit Court  
and County Court

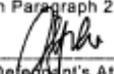
\_\_\_\_\_  
Defendant's Signature

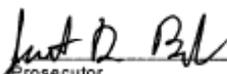
By: \_\_\_\_\_  
Deputy Clerk in Attendance

**CERTIFICATE OF DEFENDANT'S ATTORNEY(S) AND PROSECUTOR**

I/We, Defendant's Counsel of Record, certify that: I/we have discussed this case with defendant, including the nature of the charges, essential elements of each, the evidence against him/her of which I am aware, the possible defense he/she has, the maximum penalty for the charge(s) and the right to appeal. No promises have been made other than as set forth in this plea or on the record. I believe the defendant fully understands this written plea, the consequences of entering it, and that the plea is entered of the defendant's own free will.

I, the Prosecutor, consent to the plea(s) to lesser charges, if applicable, and confirm the representations in Paragraph 2.

  
\_\_\_\_\_  
Defendant's Attorney(s)  
Florida Bar No. 0138113

  
\_\_\_\_\_  
Prosecutor  
Florida Bar No. 0022369

**DNA INQUIRY ADDENDUM TO PLEA OF GUILTY OR NOLO CONTENDRE**

**DEFENSE COUNSEL**

FS I have reviewed the discovery disclosed by the State, including a listing or description of physical items of evidence.

FS I have reviewed with my client the nature of the evidence disclosed through discovery.

FS I am personally unaware of any physical evidence for which DNA testing may exonerate my client.

\_\_\_\_\_  
Defendant's Attorney(s)  
Florida Bar No. \_\_\_\_\_

\_\_\_\_\_  
Date

**DEFENDANT**

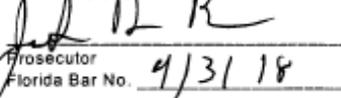
\_\_\_\_\_ I have discussed the discovery and information with my attorney and agree to the representations made by my attorney.

  
\_\_\_\_\_  
Defendant

4/3/18  
\_\_\_\_\_  
Date

**PROSECUTOR**

\_\_\_\_\_ I am personally unaware of any physical evidence for which DNA testing may exonerate the defendant.

  
\_\_\_\_\_  
Prosecutor  
Florida Bar No. 413118

4/3/18  
\_\_\_\_\_  
Date

**EXHIBIT D**

In the Circuit Court of the  
Ninth Judicial Circuit, in and  
for Orange County, Florida

Division: Div 12

Case No: 2016-CF-001171-A-O

State of Florida,  
Plaintiff,

vs.

MICAH HARRELL  
Defendant.

Date of birth: 4/9/1970

**JUDGMENT**

The defendant, MICAH HARRELL, being personally before this Court, represented by FRITZ SCHELLER, and the state represented by The State of Florida:

1. SCHEME TO DEFRAUD (>\$20,000, <\$50,000)	817.034(4)(A)(2)	Second Degree - Felony	Nolo Contendere	1 - Adjudication Withheld
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Filed in Open Court on April 3, 2018

Deputy Clerk in Attendance: Maria F.  
Office of Tiffany M. Russell, Orange County Clerk of the Circuit and County Courts

CHRELL

**EXHIBIT E**

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE COUNTY, FLORIDA**

STATE OF FLORIDA,  
Plaintiff,

CASE NO.: 2016-CF-001171-A/O

v.

Div. 12

MICAH HARRELL,  
Defendant.

**ORDER FOR RESTITUTION AS A CONDITION OF PROBATION**

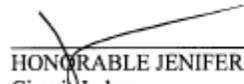
THIS CAUSE came before the Court at the defendant's sentencing and upon the State's *ores tenus* Motion for an Order for Restitution as a Condition of Probation. The Court being fully advised in the premises of the Motion, and after hearing the arguments of counsel and in consideration of all of the facts and circumstances, the Court finds that:

1. The below-listed victim's losses are reasonable and justified; and
2. The Defendant, Micah Harrell has the earning ability, when measured against his financial needs, to pay the costs of restitution.

**ORDERED AND ADJUDGED** that the Defendant, Micah Harrell, shall make restitution to the victim(s) as listed in this case in the total amount of Forty-Two Thousand Dollars and 00/100 (\$42,000.00) as a special condition of the Defendant's probation. Restitution shall be paid to:

**Office of the Attorney General  
PL-01, The Capitol  
Tallahassee, Florida 32399-1050  
Attention: Medicaid Fraud Control Unit  
RE: Case No. MFC-14-00981  
Payee ID Number: 32OFFAT001**

**DONE AND ORDERED** in Orlando, Orange County, Florida, this 3 day of April 2018.

  
\_\_\_\_\_  
HONORABLE JENIFER M. HARRIS  
Circuit Judge

FILED IN OPEN COURT 4/3/18  
Clerk, Cir. Ct., Orange Co., Fl  
By  \_\_\_\_\_ D.C.