

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**09-60114 CR-DIMITROULEAS**

18 U.S.C. § 1518  
18 U.S.C. § 1001  
18 U.S.C. § 982

**MAGISTRATE JUDGE  
SNOW**

UNITED STATES OF AMERICA, )  
 )  
v. )  
 )  
CHRISTINA LAPP, )  
 )  
Defendant. )  
\_\_\_\_\_ /

FILED  
2009/08/23 PM 3:55  
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**INFORMATION**

The United States charges that:

**COUNT 1**

On or about August 23, 2004, in Broward County, in the Southern District of Florida,  
and elsewhere, the defendant,

**CHRISTINA LAPP,**

did knowingly and willfully attempt to prevent, obstruct, mislead and delay the  
communication of information and records relating to a Federal health care offense to a  
criminal investigator, in that the defendant submitted documentation stating that she was the  
sole owner of the Broward Care Medical Center and Broward Care Chiropractic Center,  
when the defendant knew the same to be untrue; in violation of Title 18, United States Code,  
Section 1518.

COUNT 2

On or about August 23, 2004, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**CHRISTINA LAPP,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make false, fraudulent and fictitious statements and representations as to material facts, in that she represented that she was the sole owner of the Broward Care Medical Center and Broward Care Chiropractic Center, when in truth and in fact, and as she then and there well knew, she was not the sole owner of the Broward Care Medical Center and Broward Care Chiropractic Center; in violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATIONS  
(18 U.S.C. §982)

HEALTH CARE FRAUD FORFEITURE ALLEGATIONS

The allegations of Count 1 are realleged and incorporated herein by reference for the purpose of alleging forfeitures pursuant to Title 18 United States Code, Section 982(a)(7). Upon conviction of the federal health care offense alleged in Count 1 of this Superseding Information, the defendant,

**CHRISTINA LAPP,**

shall forfeit to the United States pursuant to 18 U.S.C. §982(a)(7), all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, including but not limited to the following:

**A. Money Judgment**

A sum of money equal to \$537,350.06 in United States currency, representing the amount of proceeds obtained by the defendants, directly or indirectly, from commission of the health care offense during the period charged in Count 1, in violation of Title 18 United States Code, Sections 1518, for which the defendant is liable. This amount represents a money judgment for all the proceeds obtained by the defendant during the period of Count 1.


If any of the above-described forfeitable property, as a result of any act or omission of a defendant:

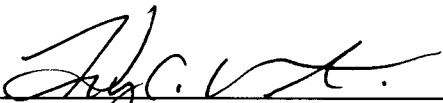
1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. §982 (b)(2), to seek forfeiture of any other property of said defendant up to the value of the above-described property.

All pursuant to Title 18, United States Code, Sections 982(a)(7) and (b)(2), and Rule

32.2(a), Federal Rules of Criminal Procedure.

  
\_\_\_\_\_  
R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
HARRY C. WALLACE, JR.  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** CHRISTINA LAPP

**Case No:** 08-60168-CR-WJZ

Count #: 1

Obstruction of a criminal investigation of health care offenses  
Title 18, United States Code, Sections 1518

**\* Max. Penalty:** 5 years' imprisonment \$250,000 fine; & 3 years' supervised release

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Count #: 2

Making materially false statements  
Title 18, United States Code, Section 1001(a)(2)

**\*Max. Penalty:** 5 years' imprisonment \$250,000 fine; & 3 years' supervised release

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

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

vs.

CERTIFICATE OF TRIAL ATTORNEY\*

CHRISTINA LAPP,

Defendant.

Superseding Case Information:

Court Division: (Select One)

X Miami FTL         Key West WPB         FTP

New Defendant(s)    Yes         No       
Number of New Defendants  
Total number of counts        2    

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No  
List language and/or dialect English

4. This case will take 4 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u>X</u>	Petty <u>    </u>
II 6 to 10 days <u>    </u>	Minor <u>    </u>
III 11 to 20 days <u>    </u>	Misdem. <u>    </u>
IV 21 to 60 days <u>    </u>	Felony <u>X</u>
V 61 days and over <u>    </u>	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: \_\_\_\_\_ Case No. \_\_\_\_\_

(Attach copy of dispositive order)  
Has a complaint been filed in this matter? (Yes or No)     

If yes: Magistrate Case No. \_\_\_\_\_

Related Miscellaneous numbers: \_\_\_\_\_

Defendant(s) in federal custody as of \_\_\_\_\_


Defendant(s) in state custody as of \_\_\_\_\_

Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003?      Yes X No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007?      Yes X No

  
HARRY C. WALLACE, JR.  
ASSISTANT UNITED STATES ATTORNEY  
Florida Bar No./Court No.

UNITED STATES DISTRICT COURT  
for the  
Southern District of Florida

United States of America  
v.  
CHRISTINA LAPP

*Defendant*

)  
) Case No.  
**09-60114**  
)

WAIVER OF AN INDICTMENT

CR-DIMITROULEAC  
MAGISTRATE JUDGE  
SNOW

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Defendant's signature*

\_\_\_\_\_  
*Signature of defendant's attorney*

\_\_\_\_\_  
*Printed name of defendant's attorney*

\_\_\_\_\_  
*Judge's signature*

\_\_\_\_\_  
*Judge's printed name and title*