Filed in District Court
State of Minnesota
6/17/2026

State of Minnesota	District Court
County of Anoka	10th Judicial District

Prosecutor File No.	33.IK70.0202
Court File No.	02-CR-26-3749

State of Minnesota,

Plaintiff,

vs.

AHMED MOHAMMED ALSAID AGWA DOB: [redacted]

[redacted]

Defendant.

COMPLAINT

Summons

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I

Charge: Theft by False Representation (Over $1,000)
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(3)(a)
Maximum Sentence: Imprisonment of not more than 5 years or payment of a fine of not more than $10,000 or both.
Offense Level: Felony

Offense Date (on or about): 10/08/2024 to 12/17/2024

Control #(ICR#): 20250011

Charge Description: On or about warrant dates October 8, 2024 through December 17, 2024, in Anoka County, State of Minnesota, Defendant Ahmed Mohammed Alsaid Agwa (DOB [redacted]), deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for himself or another more than $1,000, through the preparation or filing of a claim for reimbursement, a rate application, or cost report used to establish a rate or claim for payment for medical care provided to a recipient of medical assistance under chapter 256B, which intentionally and falsely stated the costs of or actual services provided by a vendor of medical care, to wit: Defendant intentionally and falsely represented that he provided Personal Care Assistant services and submitted claims for reimbursement to his employer Pride N Living Home Care, Inc., for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of $1,904.73, of which Defendant received $1,166.16.

COUNT II

Charge: Theft by False Representation (Over $5,000)
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2)
Maximum Sentence: Imprisonment of not more than 10 years or payment of a fine of not more than $20,000 or both.
Offense Level: Felony

Offense Date (on or about): 10/14/2023 to 02/13/2024

Control #(ICR#): 20250011

Charge Description: On or about warrant dates October 14, 2023 through February 13, 2024, in Anoka County, State of Minnesota, Defendant Ahmed Mohammed Alsaid Agwa (DOB [redacted]), deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for himself or another more than $5,000, through the preparation or filing of a claim for reimbursement, a rate application, or cost report used to establish a rate or claim for payment for medical care provided to a recipient of medical assistance under chapter 256B, which intentionally and falsely stated the costs of or actual services provided by a vendor of medical care, to wit: Defendant intentionally and falsely represented that he provided Personal Care Assistant services and submitted claims for reimbursement to his employer Pride N Living Home Care, Inc., for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of $10,917.89, of which Defendant received $6,016.80 in wages.

COUNT III

Charge: Theft by False Representation (Over $5,000)
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2)
Maximum Sentence: Imprisonment of not more than 10 years or payment of a fine of not more than $20,000 or both.
Offense Level: Felony

Offense Date (on or about): 01/18/2023 to 02/14/2023

Control #(ICR#): 20250011

Charge Description: On or about warrant dates January 18, 2023 through February 14, 2023, in Anoka County, State of Minnesota, Defendant Ahmed Mohammed Alsaid Agwa (DOB [redacted]), deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for himself or another more than $5,000, through the preparation or filing of a claim for reimbursement, a rate application, or cost report used to establish a rate or claim for payment for medical care provided to a recipient of medical assistance under chapter 256B, which intentionally and falsely stated the costs of or actual services provided by a vendor of medical care, to wit: Defendant intentionally and falsely represented that he provided Personal Care Assistant services and submitted claims for reimbursement to his employer Pride N Living Home Care, Inc., for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of $5,880.00, of which Defendant received $3,600.00 in wages.

COUNT IV

Charge: Theft by False Representation (Over $5,000)
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2)
Maximum Sentence: Imprisonment of not more than 10 years or payment of a fine of not more than $20,000 or both.
Offense Level: Felony

Offense Date (on or about): 10/26/2021 to 03/29/2022

Control #(ICR#): 20250011

Charge Description: On or about warrant dates October 26, 2021 through March 29, 2022, in Anoka County, State of Minnesota, Defendant Ahmed Mohammed Alsaid Agwa (DOB [redacted]), deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for himself or another more than $5,000, through the preparation or filing of a claim for reimbursement, a rate application, or cost report used to establish a rate or claim for payment for medical care provided to a recipient of medical assistance under chapter 256B, which intentionally and falsely stated the costs of or actual services provided by a vendor of medical care, to wit: Defendant intentionally and falsely represented that he provided Personal Care Assistant services and submitted claims for reimbursement to his employer Pride N Living Home Care, Inc., for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of $33,449.25, of which Defendant received $20,718.00 in wages.

COUNT V

Charge: Aid & Abet Theft by False Representation (Over $5,000)
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2)
Maximum Sentence: Imprisonment of not more than 10 years or payment of a fine of not more than $20,000 or both.
Offense Level: Felony

Offense Date (on or about): 03/16/2021 to 09/14/2021

Control #(ICR#): 20250011

Charge Description: On or about warrant dates March 16, 2021 through September 14, 2021, in Anoka County, State of Minnesota, Defendant Ahmed Mohammed Alsaid Agwa (DOB [redacted]), aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to intentionally deceive a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for himself or another more than $5,000, through the preparation or filing of a claim for reimbursement, a rate application, or cost report used to establish a rate or claim for payment for medical care provided to a recipient of medical assistance under chapter 256B, which intentionally and falsely stated the costs of or actual services provided by a vendor of medical care, to wit: Defendant intentionally and falsely represented that he provided Personal Care Assistant services and submitted claims for reimbursement to his employer Pride N Living Home Care, Inc., for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of $20,398.80, of which Defendant received $13,752.00 in wages.

COUNT VI

Charge: Aid & Abet Theft by False Representation (Over $5,000)
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2)
Maximum Sentence: Imprisonment of not more than 10 years or payment of a fine of not more than $20,000 or both.
Offense Level: Felony

Offense Date (on or about): 09/15/2020 to 03/02/2021

Control #(ICR#): 20250011

Charge Description: On or about warrant dates September 15, 2020 through March 2, 2021, in Anoka County, State of Minnesota, Defendant Ahmed Mohammed Alsaid Agwa (DOB [redacted]), aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to intentionally deceive a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for himself or another more than $5,000, through the preparation or filing of a claim for reimbursement, a rate application, or cost report used to establish a rate or claim for payment for medical care provided to a recipient of medical assistance under chapter 256B, which intentionally and falsely stated the costs of or actual services provided by a vendor of medical care, to wit: Defendant intentionally and falsely represented that he provided Personal Care Assistant services and submitted claims for reimbursement to his employer Pride N Living Home Care, Inc., for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of $22,145.95, of which Defendant received $14,460.00 in wages.

Filed in District Court
State of Minnesota
6/17/2026

The Complainant states that the following facts establish probable cause:

Your affiant, Angie Weidemann, is an investigator with the Medicaid Fraud Control Unit ("MFCU") of the Minnesota Attorney General's Office. As an investigator for the MFCU, I investigate allegations of billing fraud by health care providers enrolled in the Minnesota Medical Assistance Program ("Medicaid"). The MFCU investigated Ahmed Mohammed Alsaid Agwa (DOB [redacted]) ("AGWA"), Defendant herein, and determined that AGWA defrauded the Medicaid program by submitting claims for Personal Care Assistant ("PCA") services that he did not provide. I determined that AGWA could not have provided these services because he claimed to have provided services when a recipient was traveling and out of the state or country, or when AGWA was traveling and out of the state or country. AGWA's false representations caused the Medicaid program to overpay $94,696.61, of which AGWA received $59,712.96.

I. The Medicaid Program

The Medicaid program provides medical care and services to low-income Minnesotans ("recipients") who meet certain income and other eligibility requirements. The Minnesota Department of Human Services ("DHS"), located in St. Paul, administers the Medicaid program. DHS contracts with or enrolls Personal Care Assistance Provider Agencies ("Agencies") to furnish health care services to Medicaid recipients. Agencies that contract with DHS submit claims directly to DHS to receive reimbursement for services.

Under Medicaid guidelines, Personal Care Assistant ("PCA") services are provided by a PCA who is employed by an Agency to provide personal care to a recipient. PCA services include assistance with activities of daily living ("ADL") like dressing, grooming, bathing, eating, mobility, and toileting. PCA services also include instrumental activities of daily living ("IADL") such a shopping, paying bills, and meal preparation. PCA services occur in a recipient's home or in the community where normal daily activities take place. PCA services may be provided outside of Minnesota within the United States if they meet specific requirements and inform the Agency of wanting to use PCA services outside of Minnesota before they leave the state. A recipient may not use PCA services outside of the United States.

Agencies must submit background study requests, enrollment applications, and provider agreements for each of their PCAs before they provide services to recipients. Both the PCA and the recipient are required to accurately document the time the PCA spends with a recipient on a timesheet and sign the timesheet to verify that services were provided. Timesheets must also include the services provided in the recipient's home, any time spent traveling, or any time a recipient is hospitalized, in a care facility, or incarcerated. The PCA then submits the timesheet to the Agency, which bills DHS for PCA services based on the information reported in the timesheet.

II. Defendant's Fraudulent PCA Services

Following an initial investigation into Shawki Mohamed Hamed Elsaid (D.O.B.: [redacted], Co-Defendant herein, MFCU investigated AGWA's provision of PCA services and determined that AGWA had submitted claims for services that he could not have provided. AGWA worked for Pride N Living Home Care, Inc. (Pride N Living), a Minnesota corporation with a principal place of business in Anoka County. As relevant to this complaint, the review period of AGWA's employment covers services provided by him between August 2020 and January 2024.

Investigators requested employment records from Pride N Living, including timesheets submitted by AGWA. Between August 2020 and January 2024, AGWA reported providing PCA services to two recipients with initials M.A. and O.A. Investigators discovered that AGWA claimed to provide PCA services to both recipients while he was traveling out of the country. Additionally, AGWA claimed to provide PCA services to M.A. while M.A. was out of the country and after M.A.'s death. Overall, during this timeframe, investigators found 676 instances of overlap totaling over 4,900 hours of services that could not have been provided.

A. Travel Overlap

AGWA claimed to provide PCA services when he was traveling outside of the United States. Travel records obtained by investigators indicated out of the country travel periods for AGWA as follows: 1) December 15, 2020 through February 25, 2021, 2) September 20, 2021 through November 10, 2021, 3) December 31, 2022 through January 30, 2023, and 4) October 6, 2023 through October 12, 2023.

During some of the time periods that AGWA was out of the country, AGWA submitted timesheets claiming to provide PCA services to recipient O.A. and M.A. For example, on October 9, 2021, AGWA claimed to provide 7.5 hours of PCA services to O.A., which resulted in overpayment to Pride N Living in the amount of $147.00, of which AGWA received $90.00. On January 17, 2023, AGWA claimed to provide 10 hours of PCA services to M.A., which resulted in overpayment to Pride N Living in the amount of $196.00, of which AGWA received $120.00. Claims submitted by AGWA when he was out of the country totaled over 588 hours of overpayment, which resulted in overpayment to Pride N Living in the amount of $11,308.87, of which AGWA received $7,062.00.

AGWA also claimed to provide PCA services to recipient M.A. when M.A. was out of the country. Travel records obtained by investigators indicated out of the country travel periods for M.A. from August 26, 2020, through March 4, 2022. Travel records also showed M.A. leaving the United States on December 8, 2023, and never returning. AGWA still submitted timesheets for PCA services provided to M.A. during these travel periods. For example, on February 22, 2022, AGWA claimed to provide 10 hours of PCA services to M.A., which resulted in overpayment to Pride N Living in the amount of $196.00, of which AGWA received $120.00. Claims submitted by AGWA when M.A. was out of the country totaled 3,420 hours, which resulted in overpayment to Pride N Living in the amount of $64,454.33, of which AGWA received $41,058.84.

There were also times when both AGWA and recipient M.A. were out of the country at the same time. AGWA submitted timesheets and claimed to provide PCA services to M.A. during those travel times. However, Minnesota approved PCA services may not be provided outside of the United States. For example, on December 16, 2020, AGWA claimed to provide 6 hours of PCA services to M.A., which resulted in overpayment to Pride N Living in the amount of $115.77, of which AGWA received $72.00. Claims submitted by AGWA when both M.A. and AGWA were out of the country totaled 868 hours, which resulted in overpayment to Pride N Living in the amount of $16,600.78, of which AGWA received $10,416.00.

B. Death of Recipient M.A.

Investigators also discovered M.A. had died on January 18, 2024. However, AGWA continued submitting claims for PCA services provided to M.A. after M.A.'s death. For example, on January 28, 2024, AGWA claimed to provide 12.9 hours of PCA services to M.A., which resulted in overpayment to Pride N Living in the amount of $307.02, of which AGWA received $154.80. Claims submitted by AGWA after M.A.'s death totaled 98.01 hours, which resulted in overpayment to Pride N Living in the amount of $2,332.64, of which AGWA received $1,176.12.

C. Bank Payments with Co-Defendant Shawki Elsaid

Investigators obtained payroll records for AGWA from Pride N Living. Investigators also obtained bank records for both AGWA and ELSAID. Between August 2020 and April 2021, AGWA's paystubs indicate that payments from Pride N Living were direct-deposited into a bank account ending in 6714. Records for bank account ending in 6714 confirmed this account was solely held by ELSAID, who is AGWA's brother.

III. Conclusion

In sum, AGWA was employed by the Agency Pride N Living Home Care, Inc., and provided PCA services to two recipients with initials O.A. and M.A. from September 2020 through December 2024. During this time, AGWA claimed hours while recipients were out of the country and claimed hours while he was traveling out of state. Based on my review of AGWA's timesheets and claims submitted, recipients travel records and AGWA's travel records, AGWA had a total of 676 instances of overlap between September 2020 and December 2024. These 676 instances of overlap resulted in overpayment in Medicaid funds from DHS totaling $94,696.61, of which AGWA received $59,712.96.

For charging purposes, AGWA's fraud is aggregated into six-month periods of time. The following chart summarizes the charging periods related to the counts based on the warrant date (the date on which DHS issued payment) as well as the total amount paid out by the Medicaid program to AGWA:

Count	Warrant Dates	Overpayment to Agency	Overpayment to AGWA
1	10/8/2024 through 12/17/2024	$1,904.73	$1,166.16
2	10/24/2023 through 2/13/2024	$10,917.89	$6,016.80
3	2/14/2023 through 1/18/2023	$5,880.00	$3,600.00
4	10/26/2021 through 3/29/2022	$33,449.25	$20,718.00
5	9/14/2021 through 3/16/2021	$20,398.80	$13,752.00
6	9/15/2020 through 3/2/2021	$22,145.95	$14,460.00
TOTAL OVERPAYMENT:		$94,696.61	$59,712.96

Filed in District Court
State of Minnesota
6/17/2026

SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant	Angie Weidemann [redacted]	Electronically Signed: 06/17/2026 10:42 AM Wright County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney	Dominika Kins [redacted]	Electronically Signed: 06/17/2026 09:32 AM