

State of Minnesota
County of Clay

District Court
7th Judicial District

Prosecutor File No.
Court File No.

33.HS49.0214
14-CR-26-2142

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

CHRISTINE MARIE PRYOR DOB: [REDACTED]

[REDACTED]

Defendant.

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 \$5,000)

Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2)

Maximum Sentence: Imprisonment of no more than 10 years, or payment of a fine of no more than \$20,000, or both.

Offense Level: Felony

Offense Date (on or about): 06/27/2021 to 12/26/2021

Control #(ICR#): 20240050

Charge Description: On or about warrant dates of June 27, 2021 through December 26, 2021, in Clay County, State of Minnesota, Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), intentionally deceived a third person with a false representation, which is known to be false, made with the intent to defraud, and which does defraud the person to whom it is made, and obtained for herself or another more than \$5,000 of property of another, through the preparation or filing of a claim for reimbursement, a rate application, or a 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 submitted false progress notes to her employer, who then submitted the claims to the Department of Human Services, Blue Cross Blue Shield, Health Partners, and UCare who, in reliance on those claims, gave up possession of \$30,179.91 in Medicaid funds, \$21,896.47 of which Defendant received in wages.

COUNT II

Charge: Identity Theft

Minnesota Statute: 609.527.2, with reference to: 609.527.3(4)

Maximum Sentence: Imprisonment of no more than 10 years, or payment of a fine of no more than \$20,000, or both, if the value of the property or services stolen exceeds \$5,000.

Offense Level: Felony

Offense Date (on or about): 06/27/2021 to 12/26/2021

Control #(ICR#): 20240050

Charge Description: On or about warrant dates June 27, 2021 through December 26, 2021 in Clay County, State of Minnesota Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), transferred, possessed, or used an identity that was not her own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of other licensed health professionals to submit fraudulent claims for reimbursement and the value of the fraudulently submitted claims was \$30,179.91.

COUNT III

Charge: Theft by False Representation (More Than \$35,000)

Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(1)

Maximum Sentence: Imprisonment of not more than 20 years or payment of a fine of not more than \$100,000 or both.

Offense Level: Felony

Offense Date (on or about): 01/02/2022 to 05/29/2022

Control #(ICR#): 20240050

Charge Description: On or about warrant dates of January 2, 2022 through May 29, 2022, in Clay County, State of Minnesota, Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), intentionally 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 herself or another over \$35,000, 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 submitted false progress notes to her employer, who then submitted the claims to Blue Cross Blue Shield and Health Partners who, in reliance on those claims, gave up possession of \$42,096.65 in Medicaid funds, \$29,361.52 of which Defendant received in wages.

COUNT IV

Charge: Identity Theft

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5)

Maximum Sentence: Imprisonment of no more than 20 years, or payment of a fine of no more than \$100,000, or both if the value of the property or services stolen is more than \$35,000.

Offense Level: Felony

Offense Date (on or about): 01/02/2022 to 05/29/2022

Control #(ICR#): 20240050

Charge Description: On or about warrant dates January 2, 2022 through May 29, 2022, in Clay County, State of Minnesota Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), transferred, possessed, or used an identity that was not her own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of other licensed health professionals to submit fraudulent claims for reimbursement and the value of the fraudulently submitted claims was \$42,096.65.

COUNT V

Charge: Theft by False Representation (More Than \$35,000)

Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(1)

Maximum Sentence: Imprisonment of not more than 20 years or payment of a fine of not more than \$100,000 or both.

Offense Level: Felony

Offense Date (on or about): 06/22/2022 to 12/22/2022

Control #(ICR#): 20240050

Charge Description: On or about warrant dates June 22, 2022 through December 22, 2022 in Clay County, State of Minnesota, Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), intentionally 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 herself or another over \$35,000, 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 submitted false progress notes to her employer, who then submitted the claims to the Department of Human Services, Blue Cross Blue Shield, Health Partners, and UCare who, in reliance on those claims, gave up possession of \$59,694.83 in Medicaid funds, \$40,495.54 of which Defendant received in wages.

COUNT VI

Charge: Identity Theft

Minnesota Statute: 609.527.2, with reference to: 609.527.3(5)

Maximum Sentence: Imprisonment of no more than 20 years, or payment of a fine of no more than \$100,000, or both if the value of the property or services stolen is more than \$35,000.

Offense Level: Felony

Offense Date (on or about): 06/22/2022 to 12/22/2022

Control #(ICR#): 20240050

Charge Description: On or about warrant dates June 22, 2022 through December 22, 2022 in Clay County, State of Minnesota Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), transferred, possessed, or used an identity that was not her own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of other licensed health professionals to submit fraudulent claims for reimbursement and the value of the fraudulently submitted claims was \$59,694.83.

COUNT VII

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 no more than 10 years, or payment of a fine of no more than \$20,000, or both.

Offense Level: Felony

Offense Date (on or about): 12/25/2022 to 06/01/2023

Control #(ICR#): 20240050

Charge Description: On or about warrant dates of December 25, 2022 through June 1, 2023, in Clay County, State of Minnesota, Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), intentionally deceived a third person with a false representation, which is known to be false, made with the intent to defraud, and which does defraud the person to whom it is made, and obtained for herself or another more than \$5,000 of property of another, through the preparation or filing of a claim for reimbursement, a rate application, or a 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 submitted false progress notes to her employer, who then submitted the claims to the Department of Human Services, Blue Cross Blue

Shield, Health Partners, and UCare who, in reliance on those claims, gave up possession of \$23,335.53 in Medicaid funds, \$15,901.31 of which Defendant received in wages.

COUNT VIII

Charge: Identity Theft

Minnesota Statute: 609.527.2, with reference to: 609.527.3(4)

Maximum Sentence: Imprisonment of no more than 10 years, or payment of a fine of no more than \$20,000, or both, if the value of the property or services stolen exceeds \$5,000.

Offense Level: Felony

Offense Date (on or about): 12/25/2022 to 06/01/2023

Control #(ICR#): 20240050

Charge Description: On or about warrant dates December 25, 2022 through June 1, 2023 in Clay County, State of Minnesota Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), transferred, possessed, or used an identity that was not her own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of other licensed health professionals to submit fraudulent claims for reimbursement and the value of the fraudulently submitted claims was \$23,335.53.

COUNT IX

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 no more than 5 years, or payment of a fine of no more than \$10,000, or both.

Offense Level: Felony

Offense Date (on or about): 08/01/2023 to 12/05/2023

Control #(ICR#): 20240050

Charge Description: On or about warrant dates of August 1, 2023 through December 5, 2023 in Clay County, State of Minnesota, Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), intentionally deceived a third person with a false representation, which is known to be false, made with the intent to defraud, and which does defraud the person to whom it is made, and obtained for herself or another more than \$1,000 of property of another, through the preparation or filing of a claim for reimbursement, a rate application, or a 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 submitted false progress notes for reimbursement to her employer who, in reliance on the claims, submitted claims the Department of Human Services and Blue Cross Blue Shield, who, in reliance on those claims, gave up possession of \$1,351.61 in Medicaid funds, \$673.75 of which Defendant received in wages.

COUNT X

Charge: Identity Theft

Minnesota Statute: 609.527.2, with reference to: 609.527.3(3)

Maximum Sentence: Imprisonment of no more than 5 years, or payment of a fine of no more than \$10,000, or both if the value of the property or services stolen is more than \$1,000 but not more than \$5,000.

Offense Level: Felony

Offense Date (on or about): 08/01/2023 to 12/05/2023

Control #(ICR#): 20240050

Charge Description: On or about warrant dates August 1, 2023 through December 5, 2023 in Clay County, State of Minnesota Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), transferred, possessed, or used an identity that was not her own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of other licensed health professionals to submit fraudulent claims for reimbursement and the value of the fraudulently submitted claims was \$1,351.61.

COUNT XI

Charge: Theft by False Representation (Public Funds)

Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(3)(d)(iv)

Maximum Sentence: Imprisonment of no more than 5 years, or payment of a fine of no more than \$10,000, or both.

Offense Level: Felony

Offense Date (on or about): 06/20/2024

Control #(ICR#): 20240050

Charge Description: On or about warrant date of June 20, 2024 in Clay County, State of Minnesota, Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), intentionally deceived a third person with a false representation which was known to be false, made with intent to defraud, and which does defraud the person to whom it was made, and obtained for herself, or another, property consisting of public funds belonging to the state or to any political subdivision or agency thereof, through the preparation or filing of a claim for reimbursement, a rate application, or a 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 states the costs of actual services provided by a vendor of medical care, to wit: Defendant submitted false progress notes for reimbursement to her employer who, in reliance on the claims, submitted claims to UCare, who, in reliance on those claims, gave up possession public funds.

COUNT XII

Charge: Identity Theft

Minnesota Statute: 609.527.2, with reference to: 609.527.3(1)

Maximum Sentence: Imprisonment of no more than 90 days, or payment of a fine of no more than \$1,000, or both.

Offense Level: Misdemeanor

Offense Date (on or about): 06/20/2024

Control #(ICR#): 20240050

Charge Description: On or about warrant date June 20, 2024 in Clay County, State of Minnesota Defendant CHRISTINE MARIE PRYOR (DOB: [REDACTED]), transferred, possessed, or used an identity that was not her own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of 1-3 licensed health professionals to submit fraudulent claims for reimbursement and the value of the fraudulently submitted claims was \$106.98.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your affiant, Holly Phillips, 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 fraud committed by health care providers enrolled in the Minnesota Medical Assistance (“Medicaid”) program. In this capacity, I investigated behavioral health provider Christine Marie Pryor (PRYOR), and her roles as a Licensed Marriage and Family Therapist (LMFT) and Licensed Alcohol and Drug Counselor (LADC).

PRYOR defrauded the Minnesota Department of Human Services (DHS), UCare, Blue Cross/Blue Shield (BCBS), and Health Partners, by unlawfully using the identities of licensed healthcare professionals without their knowledge to bilk the Medicaid program out of over \$150,000 in LMFT and LADC services that were ineligible for reimbursement because PRYOR was never licensed to provide these services.

In total, PRYOR unlawfully used the identities of three licensed professionals to defraud the Medicaid program out of \$156,765.51. PRYOR herself obtained \$108,356.09 of these Medicaid funds.

I. The Medicaid Program.

The Medicaid program provides medical care and services to Minnesotans who meet income and other eligibility requirements (recipients). DHS administers the Medicaid program by contracting with health care providers (providers) to furnish health care services and goods to Medicaid recipients. The Medicaid program is jointly funded by the State of Minnesota and the Federal government.

In the fee for service program, providers directly bill DHS for services provided to the recipients. In the managed care program, recipients receive their insurance through a managed care organization (MCO) like UCare, BCBS, and Health Partners, which receive funding from the Medicaid program for recipients’ medical care. For recipients who receive insurance under a managed care contract, providers bill the MCO, and the MCO pays the providers with money it receives from the DHS and the Medicaid program.

When an individual enrolls as a Medicaid provider, she or he is given a unique provider ID number (NPI number) which is used to bill for all services delivered or supervised by this particular individual. Providers may not use their own provider number to bill for services delivered by a different provider. If a service is billed under the provider number of an individual who did not provide the service, the service is not eligible for Medicaid reimbursement.

The Medicaid program covers qualified psychotherapy and counseling services, as well as case management, mental health services, crisis intervention services, behavioral health treatments, and other related services. Psychotherapy services are a form of face to face, mental health services used to treat an individual’s mental illness. Psychotherapy services may be provided by a number of different providers, including a licensed family and marriage therapist like PRYOR. These providers enroll with the DHS and MCOs and receive an individual provider number for billing. Psychotherapy services must be billed through the provider who actually provided the service, if enrolled, or the clinical supervisor supervising the service, if delivered in this manner.

Psychotherapy services may be provided in an individual, group, or family setting; the reimbursement rate to the provider differs depending on the setting in which the services are delivered. Before the recipient is eligible for mental health services, a recipient must undergo a diagnostic assessment, which evaluates the recipient’s mental health. When a psychotherapy provider sees a recipient for the first time, the provider

must also develop an individualized treatment plan (ITP). The ITP must have measurable goals and objectives describing how the psychotherapy will be used to treat the recipient's mental illness.

The Medicaid program also covers licensed alcohol and drug counseling services. A LADC is a professional who is licensed by the state of Minnesota to provide counseling and support services to individuals struggling with substance use disorders. LADCs assess clients, develop treatment plans, lead therapy sessions, and help clients develop coping strategies for recovery. They work in a variety of settings, including treatment centers, hospitals, and community organizations, and must meet specific education, training, and examination requirements to obtain and maintain their license.

The Medicaid program will not reimburse LMFT or LADC services that are delivered by a person who does not meet the qualifications set forth by Minnesota and Federal law. This includes services delivered by individuals who need an active license to practice and do not have an active license.

Both LMFT and LADC service providers must then document, in progress notes, the services delivered to a recipient. Progress notes include the date of service, type of service, start and end time for the service, scope of service delivered, recipient's progress as it relates to the recipient's ITP, and other details about the services delivered during the session. If a service is not documented on a progress note or is documented fraudulently, it is not eligible for reimbursement from DHS and MCOs.

When reimbursing claims for services provided, DHS and MCOs issue "warrants" for payments to agencies. DHS and the MCOs have parallel rules about the eligibility of services for reimbursement, meaning that if a service provided to a Medicaid recipient is not eligible for payment from the DHS, it will also not be eligible for payment from the MCO.

II. PRYOR's Fraud.

PRYOR worked as an unlicensed LMFC and LADC at Lakeland Mental Health Center (Lakeland) and The Lotus Center (Lotus). Lakeland is located at 101 32nd Ave. S. in Moorhead. Lotus is located at 1401 8th St. S. BSMT in Moorhead. Both are located in Clay County, Minnesota.

Lakeland.

This case was referred to the MFCU from UCare. UCare was notified by Lakeland that PRYOR was utilizing false identification to provide behavioral health services to Medicaid recipients at Lakeland and at her previous employer, Lotus. Lakeland provided the licensed individuals information to the Minnesota Licensing Department they had on file for PRYOR. The board confirmed PRYOR was not the same person as C.W., the individual whose licensing credentials PRYOR was operating under. Upon review of PRYOR's Lakeland employment file, notable discrepancies were found. The resume submitted to Lakeland said "Christine Pryor" whereas the license submitted had the name C.W. The initial employment application said "Christine Pryor-Waisner" (the same last name as victim C.W.). PRYOR explained the hyphenated name was her new name after getting married. Among the documentation was a Master of Science degree from Capella University for PRYOR as well as transcripts. I have since learned that the degree and transcripts were fraudulently created by PRYOR and were not true. The records included an initial Lakeland hire date for PRYOR of February 13, 2023, and a termination date of June 30, 2023, due to PRYOR failing to furnish Lakeland with requested credentials. In all documentation, the license number lists that of C.W. I reviewed photos of C.W. and PRYOR and they are two different people.

Lotus.

I reviewed PRYOR's employee file from Lotus. PRYOR applied to be a LADC and listed a North Dakota LMFT license under the licenses and certifications section of the application. Looking up this license number on the ND Behavioral Health Board license list, the aligning license number that PRYOR listed belonged to C.S. Also in the Lotus records, there was a screen print of an LADC license showing the name C.M. PRYOR also filled out one of the application documents for Lotus with the name "Christine Pryor (Martinek)" (the same last name as victim C.M.). I reviewed photos of C.M., C.S., and PRYOR and they are three different people.

Fraud Conclusion.

In total, PRYOR had been using three different identities to obtain the necessary education and credentials to provide behavioral health services in Minnesota. Through this identity theft, PRYOR was able to appear licensed as a LADC and LFMT and treated Medicaid recipients as an unlicensed mental health practitioner, potentially resulting in patient harm. I found that PRYOR was providing services to 169 Medicaid recipients over the span of 2.5 years at Lakeland and Lotus. These recipients were receiving primarily psychotherapy services, mental health services, and alcohol and drug treatment services. They had no idea that every minute of service was provided by someone who lacked the mandatory training, experience, credentials, and license. PRYOR also opened her own counseling center, NIAM Brain Injury Center, that operated out of Fargo, North Dakota. There, PRYOR posed as a LMFT using one of the victims' credentials again.

A. Interviews.

PRYOR was charged with Theft by Deception over \$50,000 (Felony A), Unauthorized Use of Personal Identification over \$1,000 (Felony B), and Unauthorized Use of Personal Identifying Information-Obtain Credit (Felony C) in Cass County, North Dakota (Court File No. 09-2024-CR-03674) for the same conduct she committed here, but for UCare recipients in North Dakota. The North Dakota recipients, and the associated loss amounts, are not included in any charges in my investigation. PRYOR pled guilty and was sentenced on November 27, 2024, to the first count, Theft by Deception over \$50,000.

Special Investigator Mike Stolz (Stolz) of the North Dakota Insurance Department Fraud Unit interviewed the three victims and PRYOR. The three victims, C.W., C.M., and C.S., all said they had no knowledge that PRYOR was using their identifying information and that they did not give authorization or consent for PRYOR to do so.

Investigator Stolz interviewed PRYOR. PRYOR admitted to using other providers license numbers and names and stated she provided a fraudulent Capella University diploma and fraudulent transcripts to gain employment. PRYOR told Stolz that she would go on the licensing websites for Minnesota and North Dakota therapy and counseling boards to look at the list of therapists. PRYOR said she would then look for a licensed therapist with her same first name and then use those individuals' last names and license numbers when applying for jobs.

B. All Services Provided By Unauthorized Provider.

PRYOR utilized the identities and credentials of three licensed victims: C.W., C.M., and C.S. These three victims all had the proper licensing to operate as a LMFT or LADC. At Lakeland, PRYOR used C.W.'s information to provide services as a LMFT. At Lotus, PRYOR utilized C.M. and C.S.'s information to provide services as a LADC.

Over 160 recipients received services from an individual who lacked education, training, and licensure to

provide them with quality care they deserved. All of this care was paid for by Medicaid funds, and none of it would have been paid had the Medicaid payors known that PRYOR did not have the license or credentials required to provide the services.

III. Conclusion.

To calculate the total amount of fraudulent services PRYOR provided to Medicaid recipients, I reviewed the dates and times of all the services she provided while at Lakeland and Lotus from her progress notes. I used those times and dates to determine how much each organization billed and reviewed her paystubs to find the salary she received during her employment and confirm she received payment for the fraudulent services. For charging purposes, I aggregated the amounts paid out in the above-described fraud scheme into six-month period of times based on the warrant date the claims were paid. Using this calculation method, PRYOR's fraudulent conduct caused DHS/MCOs to collectively pay out the following amounts for claims that were not eligible for reimbursement:

Counts	Dates	Overpayment to Agencies	Overpayment to Provider
1	6/27/21 to 12/26/21	\$30,179.91	\$21,896.47
3	1/2/22 to 5/29/22	\$42,096.65	\$29,361.52
5	6/22/22 to 12/22/22	\$59,694.83	\$40,495.54
7	12/25/22 to 6/1/23	\$23,335.53	\$15,901.31
9	8/1/23 to 12/5/23	\$1,351.61	\$673.75
11	6/20/2024	\$106.98	\$27.50
Totals		\$156,765.51	\$108,356.09

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

Holly Phillips
Investigator



Electronically Signed:
06/17/2026 08:29 AM
St Louis County, Minnesota

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

Prosecuting Attorney Jilian Frueh
Assistant Attorney General



Electronically Signed:
06/16/2026 04:58 PM