State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 33.II58.0227
Court File No. 27-CR-26-15753

State of Minnesota,
Plaintiff,
vs.
FERNANDO NAVARRO 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 (More Than $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 not more than $20,000 or both
Offense Level: Felony

Offense Date (on or about): 02/13/2024 to 08/13/2024

Control #(ICR#): 20250010

Charge Description: On or about warrant dates February 13, 2024 through August 13, 2024, in Hennepin County, State of Minnesota, Defendant Fernando NAVARRO (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 over $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 care and services to an individual and submitted claims for reimbursement to Partners in Community Support for submission to the Minnesota Department of Human Services who, in reliance on those claims, gave up possession of public funds, $17,123.46 of which was paid to the Defendant as wages.

COUNT II

Charge: Theft by False Representation (More Than $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 not more than $20,000 or both
Offense Level: Felony

Offense Date (on or about): 08/01/2023 to 01/30/2024

Control #(ICR#): 20250010

Charge Description: On or about warrant dates August 1, 2023 through January 30, 2024, in Hennepin County, State of Minnesota, Defendant Fernando NAVARRO (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 over $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 care and services to an individual and submitted claims for reimbursement to Partners in Community Support for submission to the Minnesota Department of Human Services who, in reliance on those claims, gave up possession of public funds, $19,463.78 of which was paid to the Defendant as wages.

COUNT III

Charge: Theft by False Representation (More Than $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 not more than $20,000 or both
Offense Level: Felony

Offense Date (on or about): 01/31/2023 to 07/18/2023

Control #(ICR#): 20250010

Charge Description: On or about warrant dates January 31, 2023 through July 18, 2023, in Hennepin County, State of Minnesota, Defendant Fernando NAVARRO (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 over $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 care and services to an individual and submitted claims for reimbursement to Partners in Community Support for submission to the Minnesota Department of Human Services who, in reliance on those claims, gave up possession of public funds, $18,456.80 of which was paid to the Defendant as wages.

COUNT IV

Charge: Theft by False Representation (More Than $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 not more than $20,000 or both
Offense Level: Felony

Offense Date (on or about): 07/06/2022 to 01/04/2023

Control #(ICR#): 20250010

Charge Description: On or about warrant dates July 6, 2022 through January 4, 2023, in Hennepin County, State of Minnesota, Defendant Fernando NAVARRO (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 over $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 care and services to an individual and submitted claims for reimbursement to Partners in Community Support for submission to the Minnesota Department of Human Services who, in reliance on those claims, gave up possession of public funds, $14,936.64 of which was paid to the Defendant as wages.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your affiant, Kristopher Knodle, 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").

In this capacity, I investigated Fernando Navarro (DOB [redacted] ("NAVARRO"), Defendant herein, and determined that NAVARRO defrauded the Medicaid program by submitting claims for care and services to an individual that he did not provide. NAVARRO billed for services to an individual who was outside Minnesota while NAVARRO remained in Minnesota. NAVARRO's false representations caused the Minnesota Department of Human Services to pay funds which were not legitimately claimed, at least $69,980.68 of which was paid to NAVARRO.

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, Minnesota, administers the Medicaid program. DHS contracts with or enrolls Personal Care Provider Organizations ("PCPOs") to furnish health care services to Medicaid recipients. PCPOs that contract with DHS submit claims directly to DHS to receive reimbursement for services.

Under Medicaid guidelines, PCA services are provided by a PCA who typically is employed by a PCPO to provide personal care to a recipient. PCPOs must submit background study requests, enrollment applications, and provider agreements for each of their PCAs before they provide services to recipients. Both a 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. The PCA then submits the timesheets to the PCPO, which bills DHS or an MCO pursuant to PMAP, for PCA services based on the information reported in the timesheet

In some cases, DHS contracts with Managed Care Organizations ("MCOs") to provide health care services to Medicaid recipients on a managed care basis. This is known as the Prepaid Medical Assistance Program ("PMAP"). DHS pays the MCOs a pre-determined amount for agreeing to provide the full range of Medicaid covered services to recipients. The MCOs contract with other health care providers to provide services to recipients. Under this arrangement, providers submit claims directly to the MCOs, rather than to DHS, for the services they provide to recipients.

During the time relevant to this Complaint, Medicaid rules permitted the parent of a Medicaid-eligible minor child to provide personal assistance care to the child directly and seek reimbursement for those services. This program was called Consumer Directed Community Support (CDCS). Under this program a parent could associate with a PCPO or similar eligible entity and provide care to the child, submit timesheets to generate claims to DHS or an MCO, and be paid wages for the services. The same rules and restrictions applied to this program as to traditional PCA services, including but not limited to the requirement that the parent accurately and truthfully document actual approved services provided to the child.

II. Fraudulent Claims Submitted by the Defendant

During the time immediately preceding the time relevant to this Complaint, NAVARRO was the custodial parent of a child, C.N., who lived with NAVARRO in Minneapolis, Hennepin County, Minnesota. C.N. qualified for Medicaid services, and NAVARRO applied for and was granted permission to provide those services for reimbursement under the CDCS program. NAVARRO associated with Partners in Community Support, an agency located in Hennepin County, Minnesota, through which he submitted timesheets and was paid wages for services to C.N. NAVARRO was required to provide the care and services in person and accurately and truthfully document the services on time sheets submitted to Partners in Community Support on a timely basis. The services could only be provided personally and directly to C.N. while the child was in NAVARRO's physical care and custody. NAVARRO began billing for personal care services to C.N. not later than June 21, 2020.

After NAVARRO began billing for services to C.N., C.N. relocated to California to live with other family members. NAVARRO was aware that C.N. moved to California and was no longer eligible for services provided by NAVARRO. Despite C.N. no longer residing with NAVARRO in Minnesota, NAVARRO continued to submit timesheets and receive payment for purportedly providing personal care services to C.N. NAVARRO did not provide the services but falsely claimed that he had. When the fraud was discovered by an agency in California processing claims for services provided to C.N. in California, the matter was referred to MFCU. Following this referral, MFCU conducted an investigation, which found that NAVARRO submitted timesheets to Partners in Community Support for at least 25 months after C.N. was no longer living with NAVARRO in Minnesota.

III. Conclusion

Between at least July 6, 2022 and August 13, 2024, FERNANDO NAVARRO submitted time entries falsely claiming services to C.N. In reliance on those claims, the Minnesota Department of Human Services paid Partners in Community Support, resulting in at least $69,980.68 fraudulently paid to NAVARRO as his compensation.

For charging purposes, NAVARRO's fraud is aggregated into six-month periods of time. The following chart summarizes the charging periods related to each Count based on the warrant date (the date on which the Minnesota Department of Human Services issued payment) as well as the total amount paid out to NAVARRO from Medicaid funds:

Count	**Warrant Dates**	**Overpayment**
1	02/13/2024 to 08/13/2024	$17,123.46
2	08/01/2023 to 01/30/2024	$19,463.78
3	01/31/2023 to 07/18/2023	$18,456.80
4	07/06/2022 to 01/04/2023	$14,936.64
	Total	**$69,980.68**

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	Kris Knodle Investigator [redacted] Badge: MNAGO	Electronically Signed: 06/17/2026 03:54 PM Sherburne County, Minnesota

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

Prosecuting Attorney	Robert Lewis Assistant Attorney General [redacted]	Electronically Signed: 06/17/2026 03:04 PM