

State of Minnesota
County of Anoka

District Court
10th Judicial District

Prosecutor File No.
Court File No.

33.HN64.0227
02-CR-26-3756

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

SHAWKI MOHAMED HAMED ELSAID 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 \$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): 07/02/2024 to 07/16/2024

Control #(ICR#): 20240038

Charge Description: On or about warrant dates July 2, 2024 through July 16, 2024, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 Anytime Home Care, LLC, for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of \$3,968.65, of which Defendant received \$2,501.25.

COUNT II

Charge: Identity Theft (More than \$2,500)

Minnesota Statute: 609.527.2, with reference to: 609.527.3(4), 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): 07/02/2024 to 07/16/2024

Control #(ICR#): 20240038

Charge Description: On or about warrant dates July 2, 2024, through July 16, 2024, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (DOB [REDACTED]), intentionally transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of G.B., a Medicaid provider, to submit fraudulent Personal Care Assistance claims for reimbursement and the value of the fraudulently submitted claims was \$3,968.65.

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): 06/21/2023 to 12/19/2023

Control #(ICR#): 20240038

Charge Description: On or about warrant dates June 21, 2023 through December 19, 2023, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 Anytime Home Care, LLC, for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of public funds in the amount of \$5,806.50, of which Defendant received \$3,555.00.

COUNT IV

Charge: Identity Theft (Between \$500 and \$2,500)

Minnesota Statute: 609.527.2, with reference to: 609.527.3(3), 609.52.3(3)

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): 06/21/2023

Control #(ICR#): 20240038

Charge Description: On or about warrant dates June 21, 2023, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (DOB [REDACTED]), intentionally transferred, possessed, or used an identity that was not his own, with the intent to commit, aid, or abet unlawful activity, to wit: Defendant used the identity of L.E., a Medicaid provider, to submit fraudulent Personal Care Assistance claims for reimbursement and the value of the fraudulently submitted claims was \$1,440.60.

COUNT V

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): 12/20/2022 to 06/06/2023

Control #(ICR#): 20240038

Charge Description: On or about warrant dates December 20, 2022 through June 6, 2023 in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 Anytime Home Care, LLC, for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of \$16,860.90, of which Defendant received \$10,323.00.

COUNT VI

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): 06/07/2022 to 12/06/2022

Control #(ICR#): 20240038

Charge Description: On or about warrant dates June 7 2022, through December 6, 2022, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 Anytime Home Care, LLC, for submission to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of \$29,253.95, of which Defendant received \$17,775.00.

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 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): 12/07/2021 to 05/24/2022

Control #(ICR#): 20240038

Charge Description: On or about warrant dates December 7, 2021, through May 24, 2022, in Anoka

County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 Anytime Home Care, LLC, and 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 \$29,793.36, of which Defendant received \$18,144.00.

COUNT VIII

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): 05/25/2021 to 11/23/2021

Control #(ICR#): 20240038

Charge Description: On or about warrant dates May 25, 2021 through November 23, 2021, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 \$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 intentionally and falsely represented that he provided Personal Care Assistant services and submitted claims for reimbursement to 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 \$44,879.10, of which Defendant received \$29,839.05.

COUNT IX

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): 11/24/2020 to 05/11/2021

Control #(ICR#): 20240038

Charge Description: On or about warrant dates November 24, 2020 through May 11, 2021, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 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 \$32,247.39, of which Defendant received \$21,136.05.

COUNT X

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): 06/23/2020 to 11/10/2020

Control #(ICR#): 20240038

Charge Description: On or about warrant dates June 23, 2020 through November 10, 2020, in Anoka County, State of Minnesota, Defendant Shawki Mohamed Hamed Elsaid (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 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 \$19,737.56, of which Defendant received \$13,328.56.

STATEMENT OF PROBABLE CAUSE

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 Shawki Mohamed Hamed Elsaid (DOB [REDACTED]) (“ELSAID”), Defendant herein, and determined that ELSAID defrauded the Medicaid program by submitting claims for Personal Care Assistant (“PCA”) services that he did not provide. I determined that ELSAID 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 ELSAID was traveling and out of the state or country. ELSAID also used another person’s identifying information to submit claims. ELSAID’s false representations caused the Medicaid program to overpay \$182,547.41, of which ELSAID received \$116,601.91.

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 as 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 Conduct

Following a referral from the Crystal Police Department, MFCU investigated ELSAID for the submission of claims for services that ELSAID could not have provided due to his travel out of the country, recipient’s travel out of the country, and using other individual’s identifying information. ELSAID submitted claims for reimbursement to Anytime Home Care, LLC (Anytime), and Pride N Living, Inc. (Pride N Living), that were ultimately paid out by DHS. Anytime is located in Golden Valley, Hennepin County, Minnesota, and Pride N Living is located in Fridley, Anoka County, Minnesota. ELSAID claimed to reside in Blaine,

Anoka County, Minnesota during this time.

In April 2023, the Crystal Police Department received a report from L.E. that she believed her ex-husband, ELSAID, was using her identifying information to submit claims to Anytime. L.E. told officers that at the time she was employed by Pride N Living, but her manager at Pride N Living stated she was violating company policy by working two jobs. L.E. reviewed her tax documentation and discovered a 2020 W-2 form indicating she had worked at Anytime. L.E. told officers she did not work for Anytime, did not receive any payment from Anytime, and did not receive any W-2's from Anytime. L.E. also believed ELSAID had done something similar to his aunt, who had relocated to Texas. Following execution of a signed search warrant for L.E.'s employment records with Anytime, officers discovered L.E. had been employed by Anytime between February 2020 and April 2023. MFCU then received the referral and began its investigation into ELSAID.

MFCU investigators requested and obtained records from Pride N Living and Anytime. A review of these records and interviews conducted with involved parties uncovered ELSAID had submitted timesheets to both Pride N Living and Anytime using three individuals' identities: L.E. N.O., and G.B. ELSAID submitted claims using L.E.'s identifying information to Anytime that resulted in overpayment of over \$39,000, of which ELSAID received over \$24,000. ELSAID submitted claims using N.O.'s identifying information to Pride N Living that resulted in overpayment of over \$69,000, of which ELSAID received over \$45,000. Although it initially appeared G.B. had overlapping employment at Anytime, it turns out ELSAID submitted claims using G.B.'s identifying information to Anytime, which resulted in overpayment of over \$3,900, of which ELSAID received over \$2,500.

a. Fraud Relating to L.E.

Investigators obtained and reviewed records from Anytime pertaining to the employment, payroll, and timesheet records of both L.E. and ELSAID. It appeared handwriting for both ELSAID and L.E.'s employment documents was the same. Following review of the records, which claimed L.E. provided PCA services to recipient O.A., investigators interviewed L.E. in July 2024 to determine the validity of these records and her employment with Anytime.

L.E. told investigators she had never filled out any direct deposit information with Anytime and that the handwriting on the forms was not hers. The first direct deposit form was for a Bank of America account that L.E. denied having access to or knowledge of. The second direct deposit form was for a U.S. Bank account, which L.E. stated was a court-ordered account opened for child support services following her separation from ELSAID. L.E. stated she did not have access to this account nor could make deposits into this account, and only had a Visa card to withdraw money from the account. Investigators then showed L.E. a check that had been signed over to ELSAID. L.E. stated the handwriting on the check was not her, she had never seen the check before, and she had never authorized or signed over a check to ELSAID. When investigators showed her a timesheet from Anytime, she denied ever filling out the timesheet and stated the signature at the bottom was not hers.

The direct deposit documents from Anytime showed one form dated April 5, 2020, for a U.S. Bank account ending 6714 and the second form dated May 11, 2022 for a Bank of America account ending in 3201, both of which were submitted under L.E.'s name. Investigators confirmed that both the U.S. Bank account ending in 6714 and the Bank of America account ending in 3201 belonged to ELSAID and direct deposits from Anytime for L.E. were being deposited into these accounts. Overall, between warrant dates 5/24/2022 and 6/21/2023, ELSAID submitted claims and received payment using L.E.'s identifying information, which caused overpayment to Anytime in the amount of \$39,807.15, of which ELSAID received \$24,192.00.

b. Fraud Relating to N.O.

In October 2024, investigators went to Pride N Living to retrieve employment records relating to ELSAID. Upon arrival, they spoke with the office manager, M.S., who stated N.O., a former employee of Pride N Living, had been the victim of identity theft and believed it was ELSAID because ELSAID submitted timesheets on behalf of N.O. Timesheets submitted claimed N.O. provided PCA services to recipients O.A. and M.A. between June 2020 and March 2022. Additionally, N.O. had received correspondence from the IRS indicating she remained employed by Pride N Living despite having relocated to a different state.

Investigators were able to locate N.O. in Texas and were able to interview her in December 2024. N.O. indicated she originally lived in Minnesota with ELSAID and moved to Texas in 2019. N.O. stated ELSAID worked for Pride N Living and while she was in Minnesota, she interviewed for a job with Pride N Living. N.O. was told she did not get the job and thought that was the end of it. Since she moved to Texas, she has not had any contact with ELSAID. Then, when she was processing some citizenship papers, it was discovered N.O. owed money to the IRS for her work with Pride N Living. Despite being told she did not get a job there, her identifying information was being used and the checks were being routed to ELSAID. N.O. stated she never received any money from Pride N Living, denied ever working there, and stated she never provided PCA services to anyone.

Pride N Living employment records for N.O. were obtained, which showed that N.O. was being paid by direct deposit into a U.S. Bank account ending in 0252 until October 2021. It was confirmed by U.S. Bank that this account belonged to ELSAID. Then, until March 2022, N.O. was being paid by direct deposit into a Bank of America account ending in 3201, which belonged to ELSAID. Overall, between warrant dates 6/23/2020 and 3/29/2022, ELSAID submitted claims and received payment using N.O.'s identifying information, which caused overpayment to Pride N Living in the amount of \$69,000.29, of which ELSAID received \$45,206.56.

c. Fraud Relating to G.B.

Investigators also uncovered ELSAID had used G.B.'s identifying information to submit claims for reimbursement between May 2024 and June 2024 for recipient M.M., who is ELSAID's mother. Investigators interviewed G.B., who stated he knew ELSAID and was recruited by him to provide PCA services to M.M. after which G.B. obtained employment through Anytime. When ELSAID approached him, ELSAID told G.B. the hours would be minimal and ELSAID would pay him directly. G.B. never completed any formal onboarding with Anytime and never controlled the direct deposit account where payments were sent. G.B. believed the direct deposit account belonged to ELSAID. G.B. stated he picked up one paycheck from Anytime after becoming frustrated he wasn't being paid as expected. ELSAID told G.B. he would pay him more money for being present at an agency nurse visit and also offered to split the PCA payments, but none of that came to fruition.

Investigators told G.B. the claims records showed he provided an average of 9 hours of PCA services per day to M.M., but G.B. stated he only provided services about three times with three hours per visit, and estimated his total amount of actual services between May and June of 2024 totaled nine 9 hours. G.B. further stated his other employment prevented him from providing the hours submitted for claim reimbursement. G.B. stated ELSAID had access to G.B.'s Electronic Visit Verification (EVV) utilized for electronic timesheet submission, which allowed ELSAID full access to submit timesheets on G.B.'s behalf.

Investigators reviewed the direct deposit information in G.B.'s employment file with Anytime, which was a Discover Bank account ending in 1488, and G.B. confirmed the bank information was not his. It was confirmed by investigators the Discover bank account ending in 1488 belonged to ELSAID. Overall, between warrant dates 7/2/2024 and 7/16/2024, ELSAID submitted claims and received payment using G.B.'s identifying information, which caused overpayment to Anytime in the amount of \$3,968.65, of which

ELSAID received \$2,501.25.

d. Travel Overlap

ELSAID 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 ELSAID as follows: 1) January 12, 2021 through March 12, 2021, 2) April 2, 2021 through October 12, 2021, 3) November 23, 2021 through March 24, 2022, 4) April 19, 2022 through March 13, 2022, 5) September 25, 2022 through December 3, 2022, 6) May 14, 2023 through June 9, 2023, and 7) December 8, 2023 through January 12, 2024. Records also indicated ELSAID left the country on September 16, 2024, but did not have a return flight.

During some of the time periods that ELSAID was out of the country, ELSAID submitted timesheets claiming to provide PCA services to recipients O.A. and M.M. For example, on January 12, 2021, ELSAID claimed to provide 6 hours of PCA services to O.A., which resulted in overpayment to Pride N Living in the amount of \$115.77, of which AGWA received \$72.00. On February 23, 2022, ELSAID claimed to provide 7.5 hours of PCA services to M.M., which resulted in overpayment to Pride N Living in the amount of \$147.00, of which ELSAID received \$90.00. Claims submitted by ELSAID when he was out of the country totaled over 3,814.5 hours of overpayment, which resulted in overpayment to Pride N Living in the amount of \$69,771.32, of which ELSAID received \$44,702.10.

In addition to ELSAID's use of N.O.'s identifying information for claim submission for PCA services rendered to recipient M.A., there were several dates where M.A. was out of the country and services could not have been provided. Travel records obtained by investigators indicated out of the country travel periods for M.A. from August 26, 2020, through March 4, 2022. However, timesheets for PCA services provided to M.A. during these travel periods were still submitted and paid out to ELSAID. For example, records indicated that on October 4, 2021, N.O. provided 6 hours of PCA services to M.A., which resulted in overpayment to Pride N Living in the amount of \$117.60, of which ELSAID received \$72.00. Claims submitted for PCA services rendered by N.O. when M.A. was out of the country totaled 2,436 hours, which resulted in overpayment to Pride N Living in the amount of \$42,538.53, of which ELSAID received \$28,224.00.

e. Interview with Recipient M.A.

On January 28, 2025, investigators interviewed recipient M.A., who is ELSAID's mother. During the brief interview, M.A. retrieved her phone and called ELSAID to verify information. ELSAID told investigators that he was the responsible party (RP) for M.A., and because M.A. was alone she could not answer any questions without the RP present. ELSAID further stated he is currently overseas, his mother has dementia, and indicated he did not want the interview to continue.

f. Bank Payments with Co-Defendant Ahmed Agwa

Following an initial investigation into ELSAID, MFCU investigated Ahmed Mohammed Alsaïd Agwa (DOB 10/24/1999) ("AGWA"), ELSAID's brother and Co-Defendant herein, for his provision of PCA services and determined that AGWA had submitted claims for services that he could not have provided. AGWA also worked for Pride N Living between August 2020 and January 2024 and provided services to recipients M.A. and O.A.

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.

III. Conclusion

In sum, ELSAID was employed by the Agencies Pride N Living Home Care, Inc., and Anytime Home Care, LLC, and claimed to provide PCA services to two recipients with initials O.A. and M.M. from January 2021 through December 2023. During this time, ELSAID claimed hours while recipients were out of the country and claimed hours while he was traveling out of the country. Additionally, between June 2020 and June 2024, ELSAID was using other individuals identifying information to submit claims and receive payment for services he did not provide. Based on my review of ELSAID's timesheets and claims submitted, travel records, bank records, and interviews with witnesses, ELSAID had a total of 1,655 instances of fraudulently overpaid claims between June 2020 and June 2024. These 1,655 instances of fraudulent claims resulted in overpayment in Medicaid funds from DHS totaling \$182,547.41, of which ELSAID received \$116,601.91.

For charging purposes, ELSAID'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 ELSAID:

Theft by False Representation

Count	Warrant Dates	Overpayment to Agency	Overpayment to ELSAID
1	7/2/2024 through 7/16/2024	\$3,968.65	\$2,501.25
3	6/21/2023 through 12/19/2023	\$5,806.50	\$3,555.00
5	12/20/2022 through 6/6/2023	\$16,860.90	\$10,323.00
6	6/7/2022 through 12/2/2022	\$29,253.95	\$17,775.00
7	12/7/2021 through 5/24/2022	\$29,793.36	\$18,144.00
8	5/25/2021 through 11/23/2021	\$44,879.10	\$29,839.05
9	11/24/2020 through 5/11/2021	\$32,247.39	\$21,136.05
10	6/23/2020 through 11/10/202	\$19,737.56	\$13,328.56
TOTAL OVERPAYMENT:		\$182,547.41	\$116,601.91

Identity Theft

Count	Warrant Dates	ID Theft Amount
2	7/2/2024 through 7/16/2024	\$3,968.65
4	6/21/2023	\$1,440.60

ELSAID stated during the interview with M.A. that he was overseas and L.E. indicated to investigators ELSAID was currently in Egypt. Investigators received information through U.S. Customs and Border Protection records that ELSAID left the United States on September 16, 2024, returned June 10, 2025. Then, again left the United States on August 25, 2025, and returned in November 2025. Finally, he left the United States in January 2026 and returned on March 16, 2026. ELSAID recently had plans to travel to Egypt in May 2026, but was not on board his scheduled flight. ELSAID has both Egyptian and U.S. passports. For the foregoing reasons, a warrant complaint is being requested.

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


Electronically Signed:
06/17/2026 09:04 PM
Wright County, Minnesota

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

Prosecuting Attorney Dominika Kins


Electronically Signed:
06/17/2026 04:54 PM