

State of Minnesota
County of Ramsey

District Court
2nd Judicial District

Prosecutor File No.
Court File No.

33.HR03.0282
62-CR-26-4328

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

TREMAYNE LEMAR JACKSON 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 \$35,000)

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

Maximum Sentence: Imprisonment of no more than 20 years, or payment of a fine of no more than \$100,000, or both

Offense Level: Felony

Offense Date (on or about): 12/19/2023 to 06/18/2024

Control #(ICR#): 20024004

Charge Description: On or about warrant dates December 19, 2023, through June 18, 2024, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$35,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$60,297.70, in Medicaid funds, \$35,131.88 of which the Defendant received in wages.

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 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): 05/23/2023 to 11/21/2023

Control #(ICR#): 20024004

Charge Description: On or about warrant dates May 23, 2023, through November 21, 2023, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$5,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$22,972.73, in Medicaid funds, \$15,563.45 of which the Defendant received 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 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): 11/22/2022 to 05/09/2023

Control #(ICR#): 20024004

Charge Description: On or about warrant dates November 22, 2022, through May 9, 2023, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$5,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$8,012.61, in Medicaid funds, \$5,455.00 of which the Defendant received 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 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): 05/10/2022 to 11/08/2022

Control #(ICR#): 20024004

Charge Description: On or about warrant dates May 10, 2022, through November 8, 2022, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$5,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$8,919.53, in Medicaid funds, \$5,714.90 of which the Defendant received in wages.

COUNT V

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): 11/09/2021 to 04/26/2022

Control #(ICR#): 20024004

Charge Description: On or about warrant dates November 9, 2021, through April 26, 2022, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$1,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$7,209.38, in Medicaid funds, \$4,379.33 of which the Defendant received in wages.

COUNT VI

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): 04/27/2021 to 10/26/2021

Control #(ICR#): 20024004

Charge Description: On or about warrant dates April 27, 2021, through October 26, 2021, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$1,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$6,028.28, in Medicaid funds, \$4,065.00 of which the Defendant received in wages.

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): 09/15/2020 to 03/02/2021

Control #(ICR#): 20024004

Charge Description: On or about warrant dates October 27, 2020, through April 13, 2021, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$5,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$8,816.72, in Medicaid funds, \$5,851.62 of which the Defendant received in wages.

COUNT VIII

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): 07/07/2020 to 10/13/2020

Control #(ICR#): 20024004

Charge Description: On or about warrant dates July 7, 2020, through October 13, 2020, in Ramsey County, State of Minnesota, Defendant TREMAYNE LEMAR JACKSON (DOB [REDACTED]) intentionally deceived a third person with a false representation which is known to be false, made with intent to defraud, and which does defraud the person to whom it is made, 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, and the value of the property obtained was over \$1,000, to wit: Defendant submitted timesheets with false representations to agencies, who then used the timesheets to prepare and file false claims for reimbursement, which were relied upon by the Minnesota Department of Human Services, who gave up possession of \$3,131.36, in Medicaid funds, \$2,105.00 of which the Defendant received in wages.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your affiant, Jim Murphy, is a Lead Investigator with the Medicaid Fraud Control Unit (MFCU) of the Minnesota Attorney General's Office. As Lead Investigator for the MFCU, I investigate allegations of billing fraud by health care providers enrolled in the Minnesota Medical Assistance (Medicaid) Program. In this capacity, I investigated Tremayne Lemar Jackson (DOB [REDACTED]) (JACKSON), the defendant herein, and JACKSON's work as a Personal Care Assistant. I determined that JACKSON defrauded the Medicaid program by submitting time sheets for services that he did not provide. As a result of these false claims, the Minnesota Department of Human Services paid out over \$100,000 in Medicaid funds, \$78,266.18 of which JACKSON was paid in wages.

I. THE MEDICAID PROGRAM

The Medicaid program provides medical care and services to Minnesotans (recipients) who meet certain income and other eligibility requirements. The Medicaid program, known in Minnesota as the Minnesota Health Care Programs (MHCP), is administered by the Minnesota Department of Human Services (DHS). The DHS enrolls health care providers to furnish health care services and goods to Medicaid recipients.

Medicaid providers are informed of the laws and regulations governing their participation through the MHCP Provider Manual (Manual), which provides specific information for each provider type. For instance, providers must submit claims only after services are rendered and cannot submit claims that overstate either the level of care provided, or the amount of care provided.

Medicaid covers personal care assistant (PCA) services, which include assistance with activities of daily living like dressing, grooming, bathing, eating, mobility, and toileting. Under Medicaid guidelines, personal care services are provided by a PCA, who is employed by a Personal Care Assistance Services Agency (Agency) for the purpose of providing personal care necessary to maintain a recipient in his or her residence. A PCA is required to accurately document the time he or she spends with a recipient on a timesheet. The PCA then submits the timesheets to the Agency, which bills the DHS for services based on the information reported in the timesheet.

Homemaker services are also covered by Medicaid. Homemaker services are provided to recipients for their home management and cleaning needs. Like PCA services, homemaking services must be documented on a time sheet and provided in the recipient's home. A person receiving homemaker cleaning services is not required to be present while their home is cleaned. However, the recipient must be present for the provider to deliver homemaker home management and homemaker assistance with activities of daily living ("ADLs"). The timesheets reflect the type of homemaking service that is being provided.

Medicaid also offers a shared care option for recipients of PCA services. Shared care services are provided in the same setting at the same time by the same PCA for multiple recipients. Shared care PCA payment rates, which are different from individual PCA service rates, apply if a PCA is providing shared care services. Shared care services must be approved by an assessor before the services are rendered. Additionally, any recipients receiving shared care services must have signed the Home Care Shared Services Agreement and been approved by the Agency for shared care services. This agreement must then be kept in the recipient's file. All parties involved, including the PCA, must participate in training relating to shared care services. Finally, shared care services simultaneously provided to two separate recipients must be provided through the same Agency; in other words, a PCA cannot provide shared care

services to two separate recipients through two separate agencies.

III. JACKSON's FRAUD

JACKSON reported that he provided PCA and homemaker services to R.H., E.J., N.J., and D.J. (Medicaid recipients are identified by their initials to protect their privacy) through New Wave Home Health Care LLC, Global Star Home Health Care, Inc., Angies Home Health Care LLC, Takula Home Health Care LLC, and Alex Home Care, Inc. (collectively, the "PCA Agencies"). Between May 2020 and June 2024, JACKSON submitted over 6,000 hours in his timesheets to the PCA Agencies that he could not have worked, because at those times, he was employed elsewhere or outside of the State of Minnesota.

Based on my review of JACKSON's employment records, JACKSON was awarded a certificate of successful completion of personal care assistant training on June 13, 2016. According to that certificate, JACKSON's 2015 training covered "how to accurately complete a time card" and "[i]dentifying fraudulent behavior and the consequences of committing fraud."

Also, immediately above the PCA signature line, the New Wave Home Health Care LLC (or "New Wave") timesheets state:

I certify and swear under penalty of law that I have accurately reported on this time sheet the house I actually worked, the services I provided and the dates and times worked. I understand that misreporting my hours is fraud for which I could face criminal prosecution and civil proceedings.

The hundreds of other time sheets JACKSON signed throughout his career as a PCA for the remaining PCA Agencies contained similar certifications and acknowledgements as those contained in the New Wave timesheets.

Based on my review of JACKSON's time sheets and payroll records, between 2021 and 2022, JACKSON often claimed to work over 1,000 hours in a quarter and one time over 1,900 hours in a quarter. Typically, a full-time job constitutes approximately 500 hours per quarter. As a result of some of JACKSON's representations made in his timesheets between 2020 and 2024, Medicaid was billed for over 9,000 hours for PCA and homemaker services that JACKSON could not have provided, because he was at another job or outside of the State of Minnesota.

For example, on August 16, 2023, JACKSON posted publicly through his Facebook page:

I am going back to where I played on a pro basketball circuit, years ago, and where my career unfortunately ended (torn achilles tendon) in Dodge City, Kansas. Playing for the Dodge City Legend in the United States Basketball League was a great experience and last week I was offered the Womens Head Coaching job at Barclays College in Kansas ... Bear Nation Here I Come!!

The following summer, JACKSON posted on July 14, 2024:

It's My 2nd Year As A College Women's Basketball Head Coach, First Year I Was Able To Recruit, And Boy Did I Ever. I Brought In The Calvary!! Had The First Ever Freshman Weekend(workouts, put on a camp for the town, played games, and bonded), AND Had Them Sign On The Dotted Line!!!!
Welcome The Freshman 8 To B.C.

Nevertheless, through the school years that he was working at a college in Kansas, JACKSON continued

to submit timesheets reporting to be providing PCA services to Minnesota Medicaid recipients.

Specifically, on December 14, 2023, JACKSON reported to Takula Home Health Care LLC (or “Takula”) that JACKSON provided PCA services to N.J. from midnight to 6:00 a.m., then provided PCA services to E.J. from 11:00 a.m. to 7:00 p.m. Based on my review of Barclays College records, JACKSON was also working as a Women’s Basketball Coach and Recruiter during this time at Barclays College in Haviland, Kansas. The 2023-2024 school year at Barclays College started in August 2023 and the December holiday break did not start until December 22, 2023. As another example from that same fall semester of the school year, on November 3, 2023, JACKSON submitted timesheets to Takula reporting to have worked for N.J. between midnight and 6:00 a.m., providing PCA services, then for E.J. on the same day providing Companion Care services between 8:00 a.m. and 10:00 a.m. and PCA services between 10:30 a.m. and 5:00 p.m.

Before taking the head coaching job in Kansas, JACKSON was employed fulltime as a Behavior Specialist for Roseville Area Schools in Roseville, Minnesota from April 2020 through July 2023. According to a Human Resources Generalist, as a full-time behavioral specialist, JACKSON worked during the school hours when his schools were in session. During this time, Roseville Area Schools were in session either between 8:55 a.m. and 3:20 p.m. or 9:35 a.m. and 4:00 p.m. Nevertheless, for April 3, 2023, when Roseville schools were in session, JACKSON’s Takula timesheets reported providing services to E.J. between 7:00 a.m. and 5:00 p.m. and to R.H. between 6:00 a.m. and 12:00 p.m. Similarly, during the week of November 20, 2020, when Roseville schools were in session, JACKSON reported providing services to E.J. on three different school days from 10:00 a.m. and 3:00 p.m. And during the week of September 14, 2020, when Roseville schools were in session, JACKSON reported to two different PCA Agencies that he was providing PCA services every single school day that week, either from 7:00 a.m. to 10:30 a.m. and/or 10:00 a.m. to 4:15 p.m. I spoke with JACKSON over the phone on April 9, 2025. He acknowledged his role at Roseville was “mentorship with kids” and stated, “it was Monday through Friday but it was like mentorship, so I would... go and help out with kids who were struggling with their schooling ... so it wasn’t like anything, like a full-day type of thing.” Based on my review of Roseville School District payroll records, while employed there, JACKSON was being paid for working 52-hours during school hours every two-week pay period.

Moreover, there are times where JACKSON’s timesheets are made impossible because he was reporting to provide PCA services to a hospitalized recipient. For example, in or around December 2021, JACKSON submitted timesheets to both Takula and New Wave reporting to provide services to N.J. and E.J. JACKSON’s December 13, 2021 timesheet submitted to Takula reported providing PCA services to N.J. between 3:00 p.m. and 9:00 p.m. Not only was JACKSON working at Roseville schools until at least 3:00 p.m. that day, but according to HealthPartners’ records, N.J. was also in the hospital between 2:22 p.m. and 10:16 p.m. that day. JACKSON was warned that billing for services to hospitalized or institutionalized recipients is not permitted. For example, Alex Home Care Inc.’s (“Alex Home’s”) “time sheet rules” that JACKSON reviewed and signed on or about June 30, 2021, provide, among other things, that PCAs are to “write where [recipients] are at and what dates [any hospitalization or incarceration] occurred” on the right side of the timesheet for that day, and “Also update the office by phone ASAP.”

Also, in or around October 2022, JACKSON was still submitting timesheets to both Takula and New Wave reporting to provide services to N.J. and E.J., sometimes reporting to the two agencies separately that he was providing services to N.J. and E.J. at the same times. His October 5, 2022 timesheet to Takula reported that he was with N.J. between 5:00 a.m. and 1:00 p.m. providing homemaker services, but his timesheet to New Wave reported providing PCA services to E.J. between 6:00 a.m. and 12:30 p.m. the same day. Roseville schools were also in session that day, where he was working as a behavioral specialist between at least 10:00 a.m. and 3:00 p.m. For July 1, 2021, JACKSON similarly split his timesheets between Angies Home Health Care LLC (“Angies Home”) and Alex Home for services he

reported providing to E.J. and N.J. On that day, JACKSON reported to Alex Home he was providing Companion Care services to N.J. between midnight and 9:00 a.m., but reported to Angies Home he was providing PCA services to E.J. between 8:00 a.m. and noon. Not only do these timesheets represent he was with two recipients at once between 8:00 a.m. and 9:00 a.m., but at that time, E.J. and N.J. lived 8.8 miles (or at least a 20 minutes' drive) apart from one another.

JACKSON signed timesheets reporting over 6,000 hours' worth of time he could not have physically worked. As a result, DHS paid over \$100,000 in Medicaid funds for PCA, Companion Care, and Homemaker services that JACKSON did not provide.

When JACKSON spoke with me over the phone in April 2025, he was in Kansas. Among other things, he stated "I was told was that as long as I was doing the things that were needing to be done, it wasn't like I had to be here at a certain time." And he was "never" the person to hand in his "paperwork" with the PCA Agencies, but the timesheets he completed would have his signature. He finished, "personally, I haven't done anything wrong." Although JACKSON indicated at that time that he was willing to meet with me after this initial phone call when he was back in Minnesota, he did not respond to my subsequent requests to meet.

IV. CONCLUSION

To calculate overlap, I compared JACKSON's timesheets submitted across PCA Agencies, and with records of his other-employment activities and/or recipient hospitalization records. I found that JACKSON submitted time sheets, reporting over 6,000 hours that could not have occurred while he was working for a different employer, working out of state, or working as a PCA for another Medicaid recipient. As a result of JACKSON's false claims, the DHS paid \$125,388.31 in Medicaid funds, \$78,266.18 of which JACKSON was paid in wages. Broken down into charging periods by warrant date (the date on which DHS issued payment to the PCA Agencies for claims submitted for JACKSON work), the overpayment by DHS, based on JACKSON's conduct is as follows:

Count	Warrant Dates	Overpayment to Agency	Overpayment in Wages
1	December 19, 2023 – June 18, 2024	\$60,297.70	\$35,131.88
2	May 23, 2023 – November 21, 2023	\$22,972.73	\$15,563.45
3	November 22, 2022 – May 9, 2023	\$8,012.61	\$5,455.00
4	May 10, 2022 – November 8, 2022	\$8,919.53	\$5,714.90
5	November 9, 2021 – April 26, 2022	\$7,209.38	\$4,379.33
6	April 27, 2021 – October 26, 2021	\$6,028.28	\$4,065.00
7	October 27, 2020 – April 13, 2021	\$8,816.72	\$5,851.62
8	July 7, 2020 – October 13, 2020	\$3,131.36	\$2,105.00

Total		\$125,388.31	\$78,266.18
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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

Jim Murphy
Lead Investigator



Electronically Signed:
06/18/2026 11:23 AM
Ramsey County, Minnesota

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

Prosecuting Attorney Esther M. Soria
Assistant Attorney General



Electronically Signed:
06/18/2026 10:58 AM