Filed in District Court
State of Minnesota
9/28/2026

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 33.IQ96.0227
Court File No. 27-CR-26-25299

State of Minnesota,

Plaintiff,

vs.

KIDDJAZZMINNE CHERRALL FREEMAN DOB: 07/15/1989

3635 Knox Avenue N
Minneapolis, MN 55412-1945

Defendant.

COMPLAINT

Warrant

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: Attempted Theft by Swindle
Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1), 609.17.4(2)
Maximum Sentence: Not more than 10 years, or payment of a fine of $50,000, or both.
Offense Level: Felony

Offense Date (on or about): 02/20/2025 to 02/28/2025

Control #(ICR#): 20250016

Charge Description: On or about February 20, 2025 through February 28, 2025, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989) attempted to obtain property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property she attempted to obtain was over $35,000, to wit: FREEMAN, while having Power of Attorney of a vulnerable adult, made multiple attempts to transfer the deed for the vulnerable adult's home to her. The vulnerable adult's home had a fair market value of at least $235,000.

COUNT II

Charge: Theft by False Representation
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2), 609.05.1
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): 12/13/2024 to 06/03/2025

Control #(ICR#): 20250016

Charge Description: On or about warrant dates December 13, 2024 through June 3, 2025, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989) intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to 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 conspired with others to submit false claims for reimbursement which were relied upon by the Minnesota Department of Human Services, gave up possession of more than $5,000 in Medicaid funds, of which the Defendant received over $4,000 in wages.

COUNT III

Charge: Theft by False Representation
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(2), 609.05.1
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): 06/18/2024 to 12/03/2024

Control #(ICR#): 20250016

Charge Description: On or about warrant dates June 18, 2024 through December 3, 2024, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989) intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to 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 conspired with others to submit false claims for reimbursement which were relied upon by the Minnesota Department of Human Services, gave up possession of more than $7,000 in Medicaid funds, of which the Defendant received over $5,000 in wages.

COUNT IV

Charge: Theft by False Representation
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(3)(a), 609.05.1
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): 07/05/2023 to 10/10/2023

Control #(ICR#): 20250016

Charge Description: On or about warrant dates July 5, 2023 through October 10, 2023, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989) intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to 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 conspired with others to submit false claims for reimbursement which were relied upon by the Minnesota Department of Human Services, gave up possession of more than $3,000 in Medicaid funds, of which the Defendant received over $2,000 in wages.

COUNT V

Charge: Financial Exploitation of a Vulnerable Adult
Minnesota Statute: 609.2335.1(1)(ii), with reference to: 609.52.3(4)
Maximum Sentence: Imprisonment of no more than 364 days, or payment of a fine of no more than $3,000, or both.
Offense Level: Gross Misdemeanor

Offense Date (on or about): 12/16/2024 to 05/23/2025

Control #(ICR#): 20250016

Charge Description: On or about December 16, 2024 through May 23, 2025 in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), in breach of fiduciary obligations recognized elsewhere in law, used, managed, or took either temporarily or permanently the real or personal property or other financial resources of a vulnerable adult, whether held in the name of the vulnerable adult or a third party, for the benefit of someone other than the vulnerable adult, and the value of the property or other financial resources obtained was at least $500 but less than $1,000, to wit: FREEMAN, in breach of the fiduciary obligations of a Power of Attorney, took money from a vulnerable adult through debit card payments, and checks, for a total of more than $500 but less than $1,000, for the benefit of someone other than the vulnerable adults to whom the funds belonged.

COUNT VI

Charge: Financial Exploitation of a Vulnerable Adult
Minnesota Statute: 609.2335.1(1)(ii), 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): 05/22/2024 to 11/20/2024

Control #(ICR#): 20250016

Charge Description: On or about May 22, 2024 through November 20, 2024, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), in breach of fiduciary obligations recognized elsewhere in law, used, managed, or took either temporarily or permanently the real or personal property or other financial resources of a vulnerable adult, whether held in the name of the vulnerable adult or a third party, for the benefit of someone other than the vulnerable adult, and the value of the property or other financial resources obtained was over $1,000, to wit: FREEMAN, in breach of the fiduciary obligations of a Power of Attorney, took money from a vulnerable adult through debit card payments, and checks, for a total of more than $1,000, for the benefit of someone other than the vulnerable adults to whom the funds belonged.

COUNT VII

Charge: Financial Exploitation of a Vulnerable Adult
Minnesota Statute: 609.2335.1(1)(ii), 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): 12/09/2023 to 05/20/2024

Control #(ICR#): 20250016

Charge Description: On or about December 9, 2023 through May 20, 2024 in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), in breach of fiduciary obligations recognized elsewhere in law, used, managed, or took either temporarily or permanently the real or personal property or other financial resources of a vulnerable adult, whether held in the name of the vulnerable adult or a third party, for the benefit of someone other than the vulnerable adult, and the value of the property or other financial resources obtained was over $5,000, to wit: FREEMAN, in breach of the fiduciary obligations of a Power of Attorney, took money from a vulnerable adult through debit card payments, and checks, for a total of more than $5,000, for the benefit of someone other than the vulnerable adults to whom the funds belonged.

COUNT VIII

Charge: Financial Exploitation of a Vulnerable Adult
Minnesota Statute: 609.2335.1(1)(ii), with reference to: 609.52.3(2)
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): 09/29/2023 to 11/17/2023

Control #(ICR#): 20250016

Charge Description: On or about September 29, 2023 through November 17, 2023, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), in breach of fiduciary obligations recognized elsewhere in law, used, managed, or took either temporarily or permanently the real or personal property or other financial resources of a vulnerable adult, whether held in the name of the vulnerable adult or a third party, for the benefit of someone other than the vulnerable adult, and the value of the property or other financial resources obtained was over $1,000, to wit: FREEMAN, in breach of the fiduciary obligations of a Power of Attorney, took money from a vulnerable adult through debit card payments, and checks, for a total of more than $1,000, for the benefit of someone other than the vulnerable adults to whom the funds belonged.

COUNT IX

Charge: Financial Exploitation of a Vulnerable Adult
Minnesota Statute: 609.2335.1(2)(i), with reference to: 609.2335.3
Maximum Sentence: Imprisonment of no more than 364 days, or payment of a fine of no more than $3,000, or both.
Offense Level: Gross Misdemeanor

Offense Date (on or about): 12/16/2024 to 05/23/2025

Control #(ICR#): 20250016

Charge Description: On or about December 16, 2024 through May 23, 2025 in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), in absence of legal authority, acquired possession or control of an interest in real or personal property or other financial resources of a vulnerable adult, whether held in the name of the vulnerable adult or a third party, through the use of undue influence, harassment, or duress, to wit: FREEMAN, in absence of legal authority, acquired control of the income and accounts of a vulnerable adult, through the use of undue influence, harassment, or duress, and used it for her own benefit, not for the benefit of the vulnerable adult to whom the funds belonged.

COUNT X

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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.
Offense Level: Felony

Offense Date (on or about): 10/17/2023 to 10/16/2025

Control #(ICR#): 20250016

Charge Description: n or about October 17, 2023, through February 18, 2025, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), with intent to commit or aid an unlawful activity, used an identity that were not her own, and obtained more than $500 but less than $2,500 of property of another to wit: FREEMAN with intent to commit fraud, used the identity of vulnerable adult, P.K., to apply for and receive an EBT card, which FREEMAN then used for the benefit of herself, receiving more than $1,500.

COUNT XI

Charge: Financial Transaction Card Fraud
Minnesota Statute: 609.821.2(6)(iii), with reference to: 609.821.3(a)(1)(iii)
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): 10/17/2023 to 10/16/2025

Control #(ICR#): 20250016

Charge Description: On or about October 17, 2023, through February 18, 2025, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), upon applying for a financial transaction card for public assistance benefits that were distributed by means of a financial transaction card, knowingly made a false statement or representation for the purpose of inducing an issuer to issue a financial transaction card to obtain public benefit assistance. To wit: FREEMAN applied for, received, and used a financial transaction card in the name of a vulnerable adult and used the financial transaction card for her personal spending of over $1,500.

COUNT XII

Charge: Criminal Neglect
Minnesota Statute: 609.233.1
Maximum Sentence: Imprisonment of no more than 364 days, or payment of a fine of no more than $3,000, or both.
Offense Level: Gross Misdemeanor

Offense Date (on or about): 10/18/2024 to 02/18/2025

Control #(ICR#): 20250016

Charge Description: On or about October 18, 2024 through February 18, 2025, in Hennepin County, State of Minnesota, Defendant KIDDJAZZMINNE CHERRALL FREEMAN (DOB 07/15/1989), DEFENDANT intentionally neglected a vulnerable adult or knowingly permitted conditions to exist that resulted in the abuse or neglect of a vulnerable adult. To wit: DEFENDANT was the caretaker for a vulnerable adult and failed to provide him with health care when needed or supervise his needs such that he could safely and healthily live in his home.

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The Complainant states that the following facts establish probable cause:

Your affiant, Jim Murphy, is an Investigator Supervisor with the Medicaid Fraud Control Unit (MFCU) of the Minnesota Attorney General's Office. As an Investigator Supervisor 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, along with detectives with the Richfield Police Department investigated Kiddjazzminne Cherrall Freeman (DOB 07/15/1989) (DEFENDANT), and DEFENDANT's work as a Personal Care Assistant as well as her relationship with a vulnerable adult. I determined that DEFENDANT defrauded the Medicaid program by submitting time sheets for services that she did not provide, financially exploited a vulnerable adult by using the vulnerable adult's money for her benefit and by attempting to transfer the title of the vulnerable adult's house into her name, and neglected the vulnerable adult by failing to provide him with necessary health care and supervision.

As a result of DEFENDANT's false PCA claims, the Minnesota Department of Human Services paid out over $16,000 in Medicaid funds, of which DEFENDANT was paid over $12,000 in wages. As a result of the financial exploitation, DEFENDANT benefited by more than $10,000 from her use of his funds for her personal benefit. DEFENDANT further attempted to swindle the vulnerable adult out of his home which had a fair market value of over $35,000, when she attempted to transfer the deed for the vulnerable adult's house into her name.

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. PCA services also include tasks such as behavior and IADLs. Behavior is observing for triggers or safety concerns, and intervening to redirect and prevent problematic, harmful, or unsafe behaviors a recipient may have. IADLs refers to instrumental activities of daily living such as light housekeeping, laundry, meal planning and preparation, and other errands such as groceries or scheduling medical appointments. PCA services occur in person and are hands-on and interactive with the recipient.

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.

III. DEFENDANT's PCA FRAUD.

On service dates from May 2023 through May 2025, DEFENDANT reported providing PCA services to L.B.Jr., M.E., M.W., P.C. and P.W. (Medicaid recipients are identified by their initials to protect their privacy) through Accra Care, LLC (Accra), Integra Health Care, Inc. (Integra), Customcare, LLC (Customcare) and A+ Home Care (A+). Accra and A+ are located in Hennepin County, Minnesota. DEFENDANT also worked at Pinnacle Services, Inc. (Pinnacle), the Minnesota Racing Commission (MRC), and Hammer Residences, Inc. (Hammer). On more than 200 occasions, DEFENDANT submitted fraudulent times, reporting she was providing PCA services when she could not have provided while at work elsewhere.

DEFENDANT reported almost 700 hours of PCA services that she did not provide while at another job. For example, on April 23, 2025, DEFENDANT submitted to Integra that she started work at 7:02 am and ended at 5:53 pm. On that day, DEFENANT punched in at Hammer at 7:05 am and punched out at 5:50 pm. DEFENDANT was working at Hammer all day and could not have provided PCA services to M.D. during this time. Yet, Medicaid reimbursed Integra almost $300 for the falsely reported services.

For May 17, 2023, DEFENDANT reported to Customcare that she provided services to P.C. from 10 am until 2 pm. DEFNDANT also reported to Accra that she provided services to M.W. from 4 pm until 7 pm this day. DEFENDANT worked a full day at MRC on this day, with her work hours from 9 am until 5:30 pm. DEFENDANT reported that the services she provided to P.C. on May 17, 2023, included dressing, bathing, grooming, and other, and the services to M.W. included cleaning and behavior. All of these services are hands on services. DEFENDANT could not have been in two places at the same time, yet she reported PCA work and Medicaid reimbursed Customcare and Accra over $100 for the services DEFENDANT could not have provided.

On August 8, 2023, DEFENDANT reported providing services through Accra to M.W. from 10 am until 1 pm. DEFENDANT was at work at the MRC from 9 am until 5:30 pm on this day. DEFENDANT could not have been providing PCA services to M.W. while working at the MRC. Based upon DEFENDANT's falsely reported services, Medicaid paid Accra for services that DEFENDANT did not provide. Notably, DEFENDANT submitted a blank time sheet for MW. The timesheet did not have any times or dates entered into it, and instead only contained the RP's signature.

On April 4, 2025, DEFENDANT worked from 7:50 am until 1:45 pm at Hammer. DEFENDANT reported that she provided services to L.B.Jr. starting at 8 am and continued to provide services until 7 pm. DEFENDANT could not have provided services to L.B.Jr. from 8:00 am until 1:45 pm while she was at her other job. Although DEFENDANT could not have provided services, Medicaid reimbursed Accra based upon DEFENDANT's falsely reported times.

DEFENDANT texted with the RP for the minor recipients regarding the electronic log in for reporting the PCA times. For example, on Sunday January 5, 2025, the following exchange occurred:

> DEFENDANT: Hey do you have me clocked in for [L.B.Jr.] right now? I don't want to double up with shifts so just checking.
>
> M. Reed: No Sunday – Tuesday.
>
> M. Reed: No you are not
>
> DEFENDANT: ok. Just checking bc when I logged in it sd I was clocked in which I thought was weird.

M. Reed. Let check

M. Reed. Girl you were logged in I ended it. A lot it was just for Friday.

Later that night, M. Reed texted DEFENDANT asking for her payment for Integra. DEFENDANT responded that she would get it to her tomorrow.

On October 23, 2024, DEFENDANT submitted an electronic time sheet to A+ reporting that she began working for P.K. at 1:08 pm and ended her shift at 6:26 pm. DEFENDANT reported that during this time she performed household tasks for PK. DEFENDANT could not have been helping PK with household tasks between 1:08 pm and 4:00 pm this day because she was at work at Pinnacle.

On December 3, 2024, DEFENDANT submitted to A+ that she provided PCA services to P.K. from 1:06 pm until 9:50 pm. However, DEFENDANT was at Pinnacle from 8 am until 4 pm, so could not have been providing the reported services of bathing, dressing, grooming, and other household tasks between 1:06 pm and 4:00 pm.

When DEFENDANT signed a record reporting that she provided PCA services, her signature was under a statement that advised her that it is a crime to falsely report Medicaid services and that by signing the time sheet, she was verifying that services were provided.

On about 250 occasions, DEFENDANT falsely reported providing PCA services, that she did not actually provide because she was at work at another job. For these falsely reported services, Medicaid reimbursed Accra, Integra, A+, and Customcare more than $17,000, of which DEFENDANT received over $12,000 in wages.

IV. DEFENDANT's work with a Vulnerable Adult.

P.K. lived alone in his home in Richfield, Hennepin County, Minnesota. During an interview in May 2025, DEFENDANT stated that she met P.K. over a decade ago. DEFENDANT further stated that she had been assisting P.K. for about 18 months and that she helped him with bills; signed him up for EBT; became his PCA; and was his Power of Attorney.

During an interview with P.K. in March 2025, P.K. stated that he met DEFENDANT years ago when she worked at a strip club. P.K. further stated that DEFENDANT would stop by his house two or three times a week. When she came to his house, sometimes DEFENDANT would stay a while and other times she would drop off food and leave. DEFENDANT said that she brought food once or twice a week, but did not clean his house, nor did she assist P.K. with any of his personal hygiene needs. P.K. stated he did not receive any PCA services.

P.K. stated that DEFENDANT told him that she would pay his bills and at times when she stopped by, would get his checks. P.K. hoped that DEFENDANT was depositing his checks into his bank account. P.K. stated that DEFENDANT has his checkbook. P.K. believed that DEFENDANT was paying his property taxes along with his other bills. P.K. did not give DEFENDANT permission to take anything before his death but thought she would get something when he “croaks.” P.K. stated that he has not given DEFENDANT any gifts nor has he made any payments to a place in Maple Grove. However, P.K. thought he may have paid some of DEFENDANT's bills.

a. P.K.'s Income, Bills, and Power of Attorney

DEFENDANT took over P.K.'s finances. DEFENDANT started by offering to assist P.K. pay his bills. As early as 2022, DEFENDANT started by writing out the checks and P.K. would sign some of them.

Some of the checks DEFENDANT wrote out were to herself, including 7 checks in 2022 totaling $1,650, and 12 checks in 2023 totaling $3,500. DEFENDANT wrote another check to herself in 2024.

In addition to writing checks to herself, DEFENDANT became P.K.'s Representative Payee in July 2024. A Representative Payee (Rep Payee) is someone approved by the Social Security Administration to handle paying someone's bills and coordinating the person's finances. A Rep Payee must create a separate account for the person for whom they are Rep Payee. A Rep Payee is to use the recipient's money solely for the benefit of the recipient. After becoming P.K.'s Rep Payee, DEFNDANT rerouted P.K.'s social security checks, so they were deposited into DEFENDANT's account.

Although P.K. had his own bank account, DEFENDANT deposited P.K.'s social security checks into her account. While receiving P.K.'s checks, DEFENDANT failed to pay P.K.'s bills. P.K. got behind on paying his property taxes, when DEFENDANT failed to make the payments. When P.K.'s income was reviewed during the investigation, it was found that P.K. would have been able to afford to pay his property taxes from the income P.K. was supposed to receive.

In addition to becoming P.K.'s Rep Payee, DEFENDANT also became P.K.'s Power of Attorney on May 26, 2023. As Power of Attorney, on February 20, 2025, DEFENDANT contacted an attorney to have the deed for P.K.'s house transferred to DEFENDANT's name. The attorney informed DEFENDANT that P.K. would need to be his client. DEFENDANT then sent an email to the attorney, using an email account she created to appear that she was P.K. This email address was one of the accounts on DEFENDANT's phone that she managed. During an interview, P.K. stated that he does not have an email address, does not have a device upon which to access email, and does not know how to use or send emails. The attorney responded that they could meet to go through what needed to be done to complete the transfer.

DEFENDANT then filled out a Warranty Deed transferring P.K.'s house to her. There are text messages between DEFENDANT and a friend, who walked DEFENDANT through how to complete a Warranty Deed. On February 28, 2025, DEFENDANT took the Warranty Deed to the hospital where P.K. was a patient and asked a notary to sign it. Hospital staff would not notarize the Warranty Deed because staff determined that P.K. was not well enough to make that decision at that time.

b. P.K.'s EBT

In February 2023, an electronic application was submitted regarding EBT benefits for P.K. The application listed the email address DEFENDANT created to appear to be sending emails from P.K. The same email address that DEFENDANT used to send an email to the attorney from who appeared to be P.K. The application listed DEFENDANT as a person authorized to complete the form.

An EBT account for P.K. was authorized and activity started on April 19, 2023. Over 40 of the around 60 transactions were cash withdrawals. Most of the cash withdrawals occurred at a U.S. Bank in Maple Grove, near DEFENDANT's residence. P.K.'s EBT card was not used in 2024 for food, only to withdraw cash. Between April 2023 and October 2025, there were 11 instances where P.K.'s EBT card was used at Target, Walmart, or a grocery store.

P.K. was hospitalized in early 2025 and then transferred to a long-term care facility. While inpatient, P.K.'s EBT card was used in Maple Grove and Plymouth, including on October 16, 2025. On this date, DEFENDANT is shown on camera at Walmart, making a purchase with P.K.'s EBT card and leaving the store.

Between April 2023 and October 2025, over $2,500 was withdrawn or spent using an EBT card in P.K.'s name that he did not apply for or use.

c. P.K.'s PCA services

Between October 2024 and January 2025, DEFENDANT reported providing PCA services to P.K. on 19 days. On 8 of the 19 days DEFENDANT reported providing services to P.K., the times DEFENDANT reported providing the services overlapped with another of DEFENDANT's jobs. As explained previously in this complaint, DEFENDANT reported providing PCA services to P.K. and other recipients while she was at work at another job. In addition to the examples in the section above, on November 21, 2024, DEFENDANT submitted that she provided services to P.K. including bathing, grooming, dressing, and household tasks from 1:01 pm until 9:47 pm. However, DEFENDANT was at work at Pinnacle from 8 am until 4 pm that day, so could not have been with P.K. providing services as she reported she was to A+. Medicaid reimbursed A+ for DEFENDANT's false claims, and DEFENDANT received wages from A+ for services that were not provided. Further, P.K. stated that he did not receive PCA services from DEFENDANT.

d. Neglect of P.K.

DEFENDANT gave the appearance of being a kind and concerned friend to P.K., including offering to assist with P.K. physical and financial needs. However, DEFENDANT did not assist P.K. with his health or his financial needs. Rather, DEFENDANT neglected P.K. by failing to assist him with the daily activities that he needed to live healthy and comfortably in his home.

DEFENDANT spoke with P.K.'s case manager on January 29, 2024. DEFENDANT informed that case manager that P.K. had an infection on his foot and said she would take him to the doctor. The case manager noted that there was no medical record that DEFENDANT followed through and took P.K. to the doctor. Ultimately, the infection festered into gangrene, and P.K.'s foot was amputated. DEFENDANT neglected P.K. by failing to get P.K. the health care she committed to assisting him with.

While DEFENDANT reported that she was providing PCA services to P.K., she was not present with P.K. at times she reported. Further, DEFENDANT did not provide the services she reported. P.K. stated that DEFENDANT did not assist him with his health and hygiene. DEFENDANT dropped off food once or twice a week, but nothing more. In February 2025, DEFENDANT reported to A+ that she provided services to P.K. on February 13, 2025, from 4:07 pm until 12:52 am on February 14, 2025. DEFENDANT also reported that she was with P.K. providing PCA services from 2:00 pm until 10:45 pm on February 17, 2025. However, at 4:26 pm on February 18, 2025, DEFENDANT called 911 regarding P.K. when she found him on the floor of his home. At the hospital, P.K. was diagnosed with pneumonia, septic shock and gangrene. Additionally, P.K. had multiple severe, infected wounds on his sacrum and thighs related to pressure from lying on a hard surface. P.K.'s foot was ultimately amputated.

When DEFENDANT called 911, she stated that she did not know how long P.K. had been down. At the hospital, DEFENDANT told staff that she had seen P.K. the previous week and did not have any concerns, yet she admitted to other staff that she had not seen P.K. for 6 days. DEFENDANT neglected P.K. when she reported that she was going to his house and providing him with PCA services, to ensure he could safely remain in his home. Not only did DEFENDANT falsely report when she was providing services to P.K., but when she did visit P.K., she did not provide the care he needed.

This was not the first time DEFENDANT had failed to ensure that P.K. was living in a safe environment and receiving appropriate care. At a primary care clinic visit on October 4, 2024, the physician described P.K.'s appearance as dirty, wearing clothing that was "tense from dirt". The DEFENDANT, who attended the visit, reported that she was P.K.'s friend, was a social worker at Pinnacle Services and was responsible for helping P.K. with his IADLs. Following that interaction, the physician filed a MAARC Report (Minnesota Adult Abuse Reporting Center) due to concerns that P.K. was a vulnerable adult with cognitive decline unable to safely care for himself.

That MAARC Report led to an onsite home safety evaluation completed by Hennepin County Emergency Services on October 9, 2024. In this report, the evaluator documented multiple concerning observations about both P.K.'s personal condition and that of his home. Including the fact that the home smelled strongly of urine; P.K. had fecal matter on his feet; the food available was all heavily processed (canned pasta, bags of chips); the couch, where P.K. spent most of his time, was falling apart due to constant use; P.K. washed his clothes in a bathtub; and the house was in disrepair, noting the front stairs were deteriorating to a point where they were a hazard. The report noted that "there has not been a concerted effort to clean the house in what appears to be a long time".

In January 2025 Hennepin County Adult Protective Services (APS), received a call, stating that P.K. appeared disheveled, isolated, and neglected and it appeared that P.K. had been neglected for months. APS staff visited P.K. at his home and observed what appeared to be bottles of urine and feces throughout the house, noting that even when approaching the house, it smelled of bodily discharge.

DEFENDANT neglected P.K. when she left him alone for days at a time, without the proper care and assistance that he needed to live independently in his home. DEFENDANT was aware of P.K.'s declining health and increasing care needs when she successfully argued that P.K. needed more PCA hours to be able to live alone in his home. DEFENDANT neglected P.K. by not supervising him as he needed, and also by going for days without at minimum checking on P.K. to see that he had food, clean clothes, and a safe environment in which he was living.

Conclusion.

DEFENDANT befriended P.K. who P.K. trusted with his health and finances. DEFENDANT took advantage of this for her own benefit. DEFENDANT took P.K.'s income, deposited into her account and used it for her benefit, not for the benefit of P.K. by paying herself, and failing to pay P.K.'s bills. DEFENDANT also registered P.K. for EBT benefits, but withdrew cash, rarely purchasing groceries for P.K. with his EBT card. DEFENDANT obtained Power of Attorney for P.K. and attempted to swindle him out of his home by transferring the deed for the house to herself. DEFENDANT neglected P.K. when she reported that she would seek medical help for his infected foot, but did not, and when she reported being at his home, when she was not there, such that he collapsed, and she did not know how long he had been down.

Finally, DEFENDANT reported providing PCA services to P.K. and other Medicaid recipients when she was at other employment. To calculate the overlap, DEFENDANT's work as a PCA was compared to her other employment and to the times she reported with each recipient. I found that on about 250 occasions, DEFENDANT submitted time sheets for work that could not have occurred while she was at another job. As a result of DEFENDANT's false claims, the DHS paid over $17,000 in Medicaid funds, of which DEFENDANT was paid over $12,000 as wages. The counts for the false are broken down into charging periods by warrant date (the date on which DHS issued payment to the PCA agency for claims submitted for DEFENDANT's reported PCA work), the overpayment by DHS, based on DEFENDANT's conduct is as follows:

- Count 2 - between December 13, 2024, and June 3, 2025, Medicaid paid more Medicaid funds of over $5,000 based upon Defendant's fraudulent submissions for PCA services.
- Count 3 - between June 18, 2024, and December 3, 2024, Medicaid paid more than $5,000 in Medicaid funds based upon Defendant's fraudulent submissions for PCA services.
- Count 4 - between July 5, 2023, and October 10, 2023, Medicaid paid more than $1,000 in Medicaid funds based upon Defendant's fraudulent submissions for PCA services.

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 445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronically Signed: 09/28/2026 06:57 AM Dakota County, Minnesota

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

Prosecuting Attorney	Kristi Nielsen 445 Minnesota Street Suite 1400 St. Paul, MN 55101 (651) 296-3353	Electronically Signed: 09/25/2026 12:15 PM

Filed in District Court
State of Minnesota
9/28/2026

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

☐ SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear as directed in the Notice of Hearing before the above-named court to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

☒ WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

☐ ***Execute in MN Only*** ☐ ***Execute Nationwide*** ☐ ***Execute in Border States***

☐ ORDER OF DETENTION

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: $50,000.00
Conditions of Release: No contact with victim, P.K.

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: September 28, 2026.

Judicial Officer	Jamie L Anderson District Court Judge	Electronically Signed: 09/28/2026 08:47 AM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF HENNEPIN **STATE OF MINNESOTA** **State of Minnesota** Plaintiff vs. **Kiddjazzminne Cherrall Freeman** Defendant	*LAW ENFORCEMENT OFFICER RETURN OF SERVICE* *I hereby Certify and Return that I have served a copy of this Warrant upon the Defendant herein named.* Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Filed in District Court
State of Minnesota
9/28/2026

Name:	Kiddjazzminne Cherrall Freeman
DOB:	07/15/1989
Address:	3635 Knox Avenue N Minneapolis, MN 55412-1945
Alias Names/DOB:	
SID:	
Height:	
Weight:	
Eye Color:	
Hair Color:	
Gender:	
Race:	
Fingerprints Required per Statute:	Yes
Fingerprint match to Criminal History Record:	No
Driver's License #:	
Case Scheduling Information:	AGO Case
Alcohol Concentration:	

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	2/20/2025	609.52.2(a)(4) Theft-By Swindle	Felony	U1069	A	MN062015A	20250016
	Penalty	2/20/2025	609.52.3(1) Theft - Firearm or property value over $35,000	Felony	U1069	A	MN062015A	20250016
	Penalty	2/20/2025	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	U1069	A	MN062015A	20250016
2	Charge	12/13/2024	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	X	MN062015A	20250016
	Penalty	12/13/2024	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	X	MN062015A	20250016
	Modifier	12/13/2024	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U105G	X	MN062015A	20250016
3	Charge	6/18/2024	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	X	MN062015A	20250016
	Penalty	6/18/2024	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	X	MN062015A	20250016
	Modifier	6/18/2024	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U105G	X	MN062015A	20250016
4	Charge	7/5/2023	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105H	X	MN062015A	20250016
	Penalty	7/5/2023	609.52.3(3)(a) Theft - Value of property or services $1001 - $5,000	Felony	U105H	X	MN062015A	20250016
	Modifier	7/5/2023	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U105H	X	MN062015A	20250016
5	Charge	12/16/2024	609.2335.1(1)(ii) Financial Exploitation-Vulnerable Adult-Uses/Manages or Takes Property For Benefit of Someone Else.	Gross Misdemeanor	U270K	N	MN062015A	20250016
	Penalty	12/16/2024	609.52.3(4) Theft - Value more than $500 but less than $1001	Gross Misdemeanor	U270K	N	MN062015A	20250016
6	Charge	5/22/2024	609.2335.1(1)(ii) Financial Exploitation-Vulnerable Adult-Uses/Manages or Takes Property For Benefit of Someone Else.	Felony	U170H	N	MN062015A	20250016
	Penalty	5/22/2024	609.52.3(3)(a) Theft - Value of property or services $1001 - $5,000	Felony	U170H	N	MN062015A	20250016
7	Charge	12/9/2023	609.2335.1(1)(ii) Financial Exploitation-Vulnerable Adult-Uses/Manages or Takes Property For Benefit of Someone Else.	Felony	U170G	N	MN062015A	20250016
	Penalty	12/9/2023	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U170G	N	MN062015A	20250016
8	Charge	9/29/2023	609.2335.1(1)(ii) Financial Exploitation-Vulnerable Adult-	Felony	U170H	N	MN062015A	20250016

			Uses/Manages or Takes Property For Benefit of Someone Else.					
	Penalty	9/29/2023	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U170H	N	MN062015A	20250016
9	Charge	12/16/2024	609.2335.1(2)(i) Financial Exploitation-Vulnerable Adult-Undue Influence/Harassment/Duress	Gross Misdemeanor	U1700	N	MN062015A	20250016
	Penalty	12/16/2024	609.2335.3 Financial Exploitation of a Vulnerable Adult-609.2335, subd. 1(2)(ii) or (iii) Penalty. Ref 609.52	Gross Misdemeanor	U1700	N	MN062015A	20250016
10	Charge	10/17/2023	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1733	N	MN062015A	20250016
	Penalty	10/17/2023	609.527.3(3) Identity Theft-Penalties-2 or 3 Direct Victims/Value to Direct and Indirect Victims $501-$2,500	Felony	U1733	N	MN062015A	20250016
11	Charge	10/17/2023	609.821.2(6)(iii) Finance Trans Card Fraud-Apply-False Statement	Felony	U156H	N	MN062015A	20250016
	Penalty	10/17/2023	609.821.3(a)(1)(iii) Finance Trans Card Fraud-Value $251 - $2,500	Felony	U156H	N	MN062015A	20250016
12	Charge	10/18/2024	609.233.1 Criminal Neglect - Intentionally neglects or knowingly permits conditions to exist	Gross Misdemeanor	I2159	N	MN062015A	20250016