

State of Minnesota
County of Olmsted

District Court
3rd Judicial District

Prosecutor File No. 33.IB25.0255
Court File No. 55-CR-26-4218

State of Minnesota,

COMPLAINT

Plaintiff,

Summons

vs.

JESSICA JEAN ARNESON DOB: 07/04/1983

3035 16th Avenue NW
Rochester, MN 55901

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 (More than \$5,000)

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

Maximum Sentence: Imprisonment of no more than 10 years or payment of a fine of not more than \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 03/14/2023 to 09/12/2023

Control #(ICR#): 20240069

Charge Description: On or about warrant dates March 14, 2023 through September 12, 2023, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for herself or another over \$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 she provided Care Coordinator and Case Management services and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus who, in reliance on those claims, gave up possession of \$38,342.76, of which Defendant received \$15,451.65 in wages.

COUNT II

Charge: Theft by False Representation (More Than \$5,000)

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

Maximum Sentence: Imprisonment of no more than 10 years or payment of a fine of not more than \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 08/16/2022 to 02/14/2023

Control #(ICR#): 20240069

Charge Description: On or about warrant dates August 16, 2022 through February 14, 2023, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for herself or another over \$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 she provided Care Coordinator and Case Management services and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus who, in reliance on those claims, gave up possession of \$31,697.70, of which Defendant received \$12,222.79 in wages.

COUNT III

Charge: Theft by False Representation (More Than \$5,000)

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

Maximum Sentence: Imprisonment of no more than 10 years or payment of a fine of not more than \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 02/15/2022 to 07/19/2022

Control #(ICR#): 20240069

Charge Description: On or about warrant dates February 15, 2022 through July 19, 2022, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for herself or another over \$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 she provided Care Coordinator and Case Management services and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus who, in reliance on those claims, gave up possession of \$25,129.02, of which Defendant received \$9,488.57 in wages.

COUNT IV

Charge: Theft by False Representation (More Than \$5,000)

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

Maximum Sentence: Imprisonment of no more than 10 years or payment of a fine of not more than \$20,000 or both.

Offense Level: Felony

Offense Date (on or about): 08/17/2021 to 01/19/2022

Control #(ICR#): 20240069

Charge Description: On or about warrant dates August 17, 2021 through January 19, 2022, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for herself or another over \$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 she provided Care Coordinator and Case Management services and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus who, in reliance on those claims, gave up possession of \$19,731.50, of which Defendant received \$7,182.31 in wages.

COUNT V

Charge: Theft by False Representation (More Than \$5,000)

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

Maximum Sentence: Imprisonment of no more than 10 years or payment of a fine of not more than \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 01/20/2021 to 07/07/2021

Control #(ICR#): 20240069

Charge Description: On or about warrant dates January 20, 2021 through July 7, 2021, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for herself or another over \$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 she provided Care Coordinator and Case Management services and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus who, in reliance on those claims, gave up possession of \$25,561.84, of which Defendant received \$9,138.30 in wages.

COUNT VI

Charge: Theft by False Representation (More Than \$5,000)

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

Maximum Sentence: Imprisonment of no more than 10 years or payment of a fine of not more than \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 08/04/2020 to 01/05/2021

Control #(ICR#): 20240069

Charge Description: On or about warrant dates August 4, 2020 through January 5, 2021, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for herself or another over \$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 she provided Care Coordinator and Case Management services and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus who, in reliance on those claims, gave up possession of \$31,825.00, of which Defendant received \$10,975.00 in wages.

COUNT VII

Charge: Theft by False Representation (More Than \$5,000)

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

Maximum Sentence: Imprisonment of no more than 10 years or payment of a fine of not more than \$20,000 or both

Offense Level: Felony

Offense Date (on or about): 06/09/2020 to 06/23/2020

Control #(ICR#): 20240069

Charge Description: On or about warrant dates June 9, 2020 through June 23, 2020, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) deceived a third person with a false representation which was known to be false, made with intent to defraud, and which did defraud the person to whom it was made, and obtained for herself or another over \$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 she provided Care Coordinator and Case Management services and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus who, in reliance on those claims, gave up possession of \$13,672.02, of which Defendant received \$4,714.86 in wages.

COUNT VIII**Charge: Attempted Theft by False Representation (Public Funds)**

Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(3)(d)(iv), 609.17.4(2)

Maximum Sentence: Imprisonment of no more than 30 months or payment of a fine of not more than \$5,000 or both

Offense Level: Felony

Offense Date (on or about): 04/19/2022 to 09/06/2022

Control #(ICR#): 20240069

Charge Description: On or about April 19, 2022 through September 6, 2022, in Olmsted County, State of Minnesota, Defendant Jessica Jean Arneson (DOB 07/04/1983) with the intent to defraud and to deceive a third person with a false representation which was known to be false and to obtain for herself or another property consisting of public funds, 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 she provided Care Coordinator and Case Management services to a deceased person and submitted claims for reimbursement to her employer, Mower County, for submission to Blue Plus.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your affiant, James Murphy, is an investigator with the Medicaid Fraud Control Unit (“MFCU”) of the Minnesota Attorney General’s Office. As an investigator for the MFCU, I investigate allegations of billing fraud by health care providers enrolled in the Minnesota Medical Assistance Program (“Medicaid”).

In this capacity, I investigated Jessica Jean Arneson (DOB 07/04/1983) (“ARNESON”), Defendant herein, and determined that ARNESON defrauded the Medicaid program by submitting false claims for Care Coordinator and Case Management services. ARNESON falsely reported that she provided services to Medicaid recipients that she did not in fact provide, resulting in her employer billing Blue Plus for services not provided. ARNESON’s false representations caused Blue Plus to overpay a total of \$185,959.84, \$69,233.47 of which was paid to ARNESON as wages.

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 Provider Organizations (“PCPOs”) to furnish health care services to Medicaid recipients. PCPOs that contract with DHS submit claims directly to DHS to receive reimbursement for services.

In some cases, DHS contracts with Managed Care Organizations (“MCOs”) to provide health care services to Medicaid recipients on a managed care basis. This is known as the Prepaid Medical Assistance Program (“PMAP”). DHS pays the MCOs a pre-determined amount for agreeing to provide the full range of Medicaid covered services to recipients. The MCOs contract with other health care providers to provide services to recipients. Under this arrangement, providers submit claims directly to the MCOs, rather than to DHS, for the services they provide to recipients. The MCO in this case was Blue Plus, a component of Blue Cross / Blue Shield insurance, which had a service agreement with Mower County, Minnesota, to pay the county for managed care services provided by the county’s employees within the scope of the agreement.

II. Fraudulent Claims Submitted by the Defendant

Between at least May 2020 and August 2023, ARNESON was employed as a Care Coordinator for the Mower County Department of Health and Human Services, located in Austin, Minnesota (“the county”). ARNESON’s Care Coordinator position included providing case management services to qualifying individuals under the Medicaid program, and the county contracted with Blue Plus to provide eligible services to county residents. The Medicaid code for case management authorizes reimbursement for time case managers spend coordinating care for persons with behavioral health needs, for example, connecting clients to services, advocating for client needs, and facilitating support services for client treatment. As an employee, ARNESON prepared and submitted documentation of her work that was subsequently converted into claims submitted by the county to Blue Plus. Under this arrangement, the county submitted claims for case management and other Medicaid-reimbursable services performed by its personnel to Blue Plus for payment, and the county passed along part of the reimbursement to such personnel, including ARNESON, as wages.

Following a referral from Blue Plus, MFCU conducted an investigation of suspicious claims submitted for case management services by ARNESON. At the time of the conduct, ARNESON was a resident of Rochester in Olmsted County, Minnesota, and she was permitted by the terms of her employment to work remotely from Olmsted County. The claims submitted to Blue Plus based on ARNESON's time entries were made by county personnel in Austin, Minnesota acting on ARNESON's representations transmitted from Rochester, Minnesota.

The investigation found that ARNESON's submissions generated claims submitted to Blue Plus that did not occur. Services that generate claims are required under Medicaid rules to be timely documented and truthful. The documentation requirement is critical for the validity of the claims and assessing whether they in fact occurred and whether the conduct is reimbursable. The investigation found that many of the claims originated by ARNESON lacked supporting documentation. Subsequent analysis by Blue Plus and MFCU identified claims submitted by ARNESON without case notes to support the time billed. The aggregate reimbursements for ARNESON's billings were found to be significantly higher than other Care Coordinators with similar caseloads but lacking required supporting documentation or explanation.

In addition to claims lacking documentation, a review of ARNESON's claims indicated frequent overbilling, that is, claiming that services required a longer time than necessary. On other occasions ARNESON certified services in a matter of minutes that would require more than an hour. The investigation also showed that ARNESON had backdated documentation after the fact.

In at least two cases, ARNESON submitted claims for services to clients who were categorically ineligible for benefits. One such client had left the State of Minnesota prior to billings and was therefore ineligible for services by ARNESON. In another case, ARNESON continued to submit claims for services provided to a recipient over spread across the 14 months following the recipient's death.

In all, the investigation found that ARNESON falsely documented over 1,800 hours in fraudulent time entries.

III. Conclusion

In sum, between June 9, 2020 and September 12, 2023, JESSICA JEAN ARNESON was employed by Mower County, Minnesota, and during that time submitted time entries, as described above, falsely claiming to have provided services reimbursable by Medicaid. ARNESON's false representations resulted in overpayment from Blue Plus totaling \$185,959.84, of which ARNESON received \$69,233.47 in wages.

For charging purposes, ARNESON's fraud is aggregated into six-month periods of time. The following chart summarizes the charging periods related to each Count based on the warrant date (the date on which Blue Plus issued payment):

Count	Warrant Dates	Overpayment
1	3/14/2023 to 9/12/2023	\$38,342.76
2	8/16/2022 to 2/14/2023	\$31,697.70
3	2/15/2022 to 7/19/2022	\$25,129.02
4	8/17/2021 to 1/19/2022	\$19,731.50
5	1/20/2021 to 7/7/2021	\$25,561.84

6	8/4/2020 to 1/5/2021	\$31,825.00
7	6/9/2020 to 6/23/2020	\$13,672.02
	Total	\$185,959.84



MINNESOTA
JUDICIAL
BRANCH

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:
06/09/2026 12:37 PM
Ramsey County, Minnesota

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

Prosecuting Attorney

Robert Lewis
Assistant Attorney General
445 Minnesota Street
Suite 1400
St. Paul, MN 55101
(651) 296-3353

Electronically Signed:
06/09/2026 12:23 PM

MINNESOTA
JUDICIAL
BRANCH

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: \$
Conditions of Release:

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: June 11, 2026.

Judicial Officer

Lisa R Hayne

Electronically Signed: 06/11/2026 12:13 PM

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

**COUNTY OF OLMSTED
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Jessica Jean Arneson

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE

*I hereby Certify and Return that I have served a copy of this
Summons upon the Defendant herein named.*

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Jessica Jean Arneson
DOB: 07/04/1983
Address: 3035 16th Avenue NW
Rochester, MN 55901

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

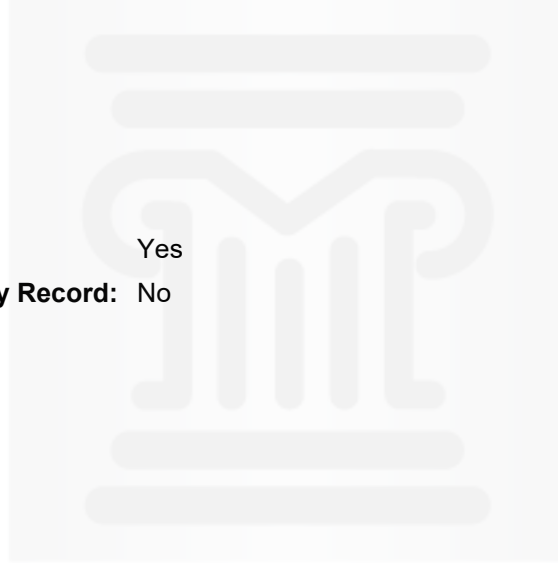
Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

Alcohol Concentration:



MINNESOTA
JUDICIAL
BRANCH

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	3/14/2023	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240069
	Penalty	3/14/2023	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240069
2	Charge	8/16/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240069
	Penalty	8/16/2022	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240069
3	Charge	2/15/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240069
	Penalty	2/15/2022	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240069
4	Charge	8/17/2021	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240069
	Penalty	8/17/2021	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240069
5	Charge	1/20/2021	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240069
	Penalty	1/20/2021	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240069
6	Charge	8/4/2020	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240069
	Penalty	8/4/2020	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240069
7	Charge	6/9/2020	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240069
	Penalty	6/9/2020	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240069
8	Charge	4/19/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U1273	A	MN062015A	20240069
	Penalty	4/19/2022	609.52.3(3)(d)(iv) Theft - Value \$1000 or less - Public funds	Felony	U1273	A	MN062015A	20240069
	Penalty	4/19/2022	609.17.4(2) Anticipatory Crimes-Attempts-Penalty-1/2 Of Intended	Felony	U1273	A	MN062015A	20240069