

State of Minnesota
County of RamseyDistrict Court
2nd Judicial DistrictProsecutor File No. 33.KH30.0262
Court File No. 62-CR-26-6901

State of Minnesota,

Plaintiff,

COMPLAINT

Summons

vs.

QALID HUSSEIN HASSAN DOB: 01/04/19979724 Nicollet Avenue S
Bloomington, MN 55420

Defendant.

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I**Charge: Theft by False Representation (over \$1,000)**

Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(3)(a), 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): 01/31/2023 to 06/21/2023

Control #(ICR#): 20260084

Charge Description: On or about warrant dates January 31, 2023 through June 21, 2023, in Ramsey County, State of Minnesota, Defendant QALID HUSSEIN HASSAN (DOB 01/04/1997) 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, who gave up possession of more than \$1,200 in Medicaid funds, of which the Defendant received over \$800 in wages.

COUNT II**Charge: Theft by False Representation (over \$1,000)**

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 a fine of no more than \$10,000, or both.

Offense Level: Felony

Offense Date (on or about): 07/19/2022 to 12/20/2022

Control #(ICR#): 20260084

Charge Description: On or about warrant dates July 19, 2022, through December 20, 2022, in Ramsey County, State of Minnesota, Defendant QALID HUSSEIN HASSAN (DOB 01/04/1997) 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 \$4,000 in Medicaid funds, of which the Defendant received almost \$2,000 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), 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): 01/19/2022 to 06/07/2022

Control #(ICR#): 20260084

Charge Description: On or about warrant date January 19, 2022, through June 7, 2022 in Ramsey County, State of Minnesota, Defendant QALID HUSSEIN HASSAN (DOB 01/04/1997) 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 \$6,000 in Medicaid funds, of which the Defendant received over \$3,300 in wages.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your affiant, Meaghan Moen, 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 (Medicaid) Program. In this capacity, I investigated Qalid Hussein Hassan (DOB 01/04/1997) (HASSAN), the defendant herein, and HASSAN's work as a Personal Care Assistant. I determined that HASSAN 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 \$11,500 in Medicaid funds, of which HASSAN was paid over \$6,000 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 ADLs. The timesheets reflect the type of homemaking service that is being provided.

Medicaid covers companion care services which includes night supervision services when a recipient needs programming support or assistance with activities of daily living throughout the night. The provider may be either an asleep or awake staff person in the recipient's home overnight. Night supervision cannot be used without an assessed need for an eligible activity, for a person who sleeps through the night, or to pay for time the person's caregiver is asleep if the caregiver lives in the home with the recipient.

As required by federal law, Medicaid prohibits Agencies from offering any kind of kickback, such as cash, merchandise, or other goods or services to a recipient to induce him or her to receive health care services from the provider.

III. HASSAN'S FRAUD.

On service dates from December 2021 through June 2023, HASSAN reported providing PCA and Homemaking services to more than a dozen recipients including A.J., C.J., S.J., C.T., M.N., M.G., T.E., S.M. and K.M. (Medicaid recipients are identified by their initials to protect their privacy) through Always on Time Health Services, Inc. (Always on Time). Always on Time was located in St. Paul, Ramsey County, Minnesota. HASSAN also worked at Whelan Security d/b/a GardaWorld (GardaWorld). HASSAN submitted almost 450 hours of fraudulent times to Always on Time.

On around 200 occasions, HASSAN did not provide PCA, homemaking, or companion care services as reported on the time sheets, as he was documented working at GardaWorld. For example, on May 28, 2023, HASSAN reported providing PCA services to S.M., a minor, from 5:00 a.m. until 9:45 a.m. However, on May 28, 2023, HASSAN was working at GardaWorld from 12:06 a.m. until 7:57 a.m. HASSAN could not have been providing PCA services to S.M. from 5:00 am until 7:57 a.m., while he was at work at GardaWorld.

From February 19, 2023, through February 23, 2023, HASSAN reported providing companion care services to A.N. from 6 p.m. until 1 a.m. the following morning. However, HASSAN could not have provided these services as reported. From February 20th through February 23rd, HASSAN clocked into his job at GardaWorld between 12:01 a.m. and 12:21 a.m. HASSAN could not have provided care to A.N. while he was driving to and at his job at GardaWorld. Yet, HASSAN signed timesheets attesting to the times reported. Medicaid reimbursed Always on Time for the services HASSAN reported providing.

On October 31, 2022, through November 4, 2022, and again from November 7th through 9th, 2022, HASSAN reported providing companion care services to F.Y. from 2 a.m. until 6 a.m. each of these nine days. However, HASSAN was clocked in at his job at GardaWorld starting between 12:01 a.m. and 12:13 a.m. and ending his shift between 7:48 a.m. and 8 a.m. each of these days. HASSAN could not have been at F.Y.'s home providing services while he was at work at GardaWorld. Yet HASSAN submitted timesheets reporting his overnight work for F.Y., and Medicaid paid over \$500 for these falsely reported services.

On November 23, 2022, HASSAN reported providing PCA services to S.M. from 6 a.m. until 10:45 a.m. However, HASSAN did not end his shift at GardaWorld until 8:04 a.m., so he could not have provided services to S.M. when he was still at work at GardaWorld. Yet, HASSAN signed timesheets verifying the false times and Medicaid funds were used to reimburse Always on Time for these false services, of which HASSAN received wages.

On January 9, 2022, HASSAN reported providing PCA services to A.J. from 7:30 p.m. until 12:30 a.m. on January 10, 2022. HASSAN also reported providing PCA services to C.J. from 5 a.m. until 8:30 a.m. HASSAN clocked into his job at Garda World at 9:06 p.m. and did not end the shift until 5:28 a.m. on January 10th. HASSAN could not have provided PCA services to A.J. and C.J. while he worked at GardaWorld. Yet, he signed timesheets verifying the times were accurate and based upon his falsely reported services, Medicaid funds were used to reimburse Always On Time for services HASSAN did not render.

On March 14th and 15th, 2022, HASSAN reported providing companion care to S.J. from 6:30 p.m. until midnight, each night. HASSAN worked at GardaWorld both nights from 9 p.m. until after midnight. HASSAN could not have been working in two places at once, yet he verified the times as accurate when he signed the timesheet. Medicaid funds were used to pay over \$180 for the falsely reported services these two nights.

The timesheets HASSAN falsely submitted included a written advisory that it was a crime to provide false information on that timesheet. Yet he signed timesheets reporting times he could not have provided when he was at another job. According to bank account records, Always on Time received payment for the timesheets HASSAN submitted that overlapped with his work at GardaWorld and Always on Time paid Hassan.

On around 200 occasions, HASSAN did not provide the services as reported on the timesheets, as he was at work at GardaWorld. On services dates between December 2021 and June 2023, HASSAN submitted timesheets reporting almost 450 hours of services that could not have been provided while HASSAN was at work at GardaWorld. DHS paid almost \$12,000 in Medicaid funds for services HASSAN did not provide. HASSAN received over \$6,000 in wages for his falsely reported services.

IV. Conclusion.

To calculate overlap, I compared HASSAN's work with Medicaid recipients and his other employment. I found that HASSAN submitted timesheets, reporting almost 450 hours that could not have occurred while he was working at another job. As a result of HASSAN's false claims, the DHS paid \$11,627.79 in Medicaid funds, \$6,140.87 of which HASSAN was paid as wages. Broken down into charging periods by warrant date (the date on which DHS, issued payment to the PCA agency for claims submitted for HASSAN's reported PCA work), the overpayment by DHS, based on HASSAN's conduct is as follows:

- Count 1 - between January 31 2023, and June 21, 2023, Medicaid paid out more than \$1,200 in Medicaid funds based upon HASSAN's fraudulent submissions for PCA and Waivered services. HASSAN received over \$800 in wages for these fraudulent submissions.
- Count 2 – between July 19, 2022, and December 20, 2022, Medicaid paid out more than \$4,000 in Medicaid funds based upon HASSAN's fraudulent submissions for PCA and Waivered services. HASSAN received almost \$2,000 in wages for these fraudulent submissions.
- Count 3 - between January 19, 2022, and June 7, 2022, Medicaid paid out more than \$6,000 in Medicaid funds based upon HASSAN's fraudulent submissions for PCA and Waivered services. HASSAN received more than \$3,300 in wages for these fraudulent submissions.

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

Meaghan Moen
Investigator
445 Minnesota Street
Suite 1400
St. Paul, MN 55101

Electronically Signed:
09/25/2026 11:18 AM
Ramsey 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 08:47 AM

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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: September 25, 2026.

Judicial Officer

Timothy Mulrooney
Judge

Electronically Signed: 09/25/2026 11:46 AM

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

**COUNTY OF RAMSEY
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Qalid Hussein Hassan

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: Qalid Hussein Hassan
DOB: 01/04/1997
Address: 9724 Nicollet Avenue S
Bloomington, MN 55420

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender:

Race:

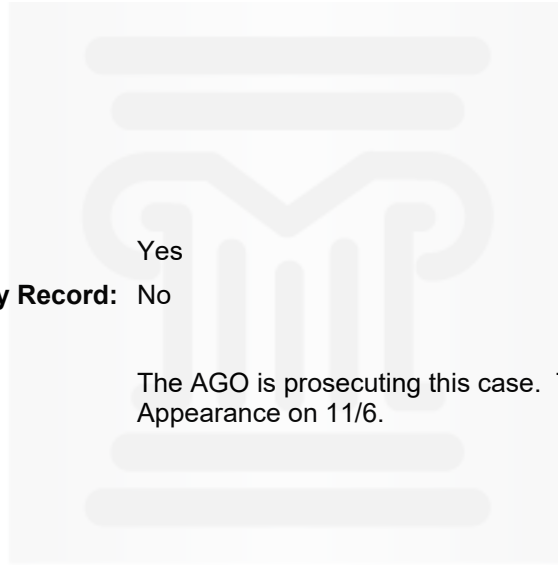
Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

Case Scheduling Information: The AGO is prosecuting this case. The State is not available for a First Appearance on 11/6.

Alcohol Concentration:



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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	1/31/2023	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105H	X	MN062015A	20260084
	Penalty	1/31/2023	609.52.3(3)(a) Theft - Value of property or services \$1001 - \$5,000	Felony	U105H	X	MN062015A	20260084
	Modifier	1/31/2023	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U105H	X	MN062015A	20260084
2	Charge	7/19/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105H	X	MN062015A	20260084
	Penalty	7/19/2022	609.52.3(3)(a) Theft - Value of property or services \$1001 - \$5,000	Felony	U105H	X	MN062015A	20260084
	Modifier	7/19/2022	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U105H	X	MN062015A	20260084
3	Charge	1/19/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	X	MN062015A	20260084
	Penalty	1/19/2022	609.52.3(2) Theft - Value over \$5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	X	MN062015A	20260084
	Modifier	1/19/2022	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U105G	X	MN062015A	20260084

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