Filed in District Court
State of Minnesota
9/25/2026

State of Minnesota
County of Ramsey

District Court
2nd Judicial District

Prosecutor File No. 33.HE55.0262
Court File No. 62-CR-26-6905

State of Minnesota,

Plaintiff,

vs.

LETRICE MARIE SPIGNER DOB: 03/05/1975

3155 Old Highway 8
#102
Minneapolis, MN 55418

Defendant.

COMPLAINT

Summons

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
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): 10/12/2023 to 04/09/2024

Control #(ICR#): 20240004

Charge Description: On or about warrant dates October 12, 2023 through April 9, 2024, in Ramsey County, State of Minnesota, Defendant Letrice Marie Spigner (DOB 03/05/1975) 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 created false timesheets which were submitted as claims to the Minnesota Department of Human Services and or Medica, who, in reliance on those claims, gave up possession of more than $5,000 in Medicaid funds.

COUNT II

Charge: Theft by False Representation
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): 03/27/2023 to 09/21/2023

Control #(ICR#): 20240004

Charge Description: On or about warrant dates March 27, 2023 through September 21, 2023 in Ramsey County, State of Minnesota, Defendant Letrice Marie Spigner (DOB 03/05/1975) 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 created false timesheets which were submitted as claims to the Minnesota Department of Human Services and/or Medica, who, in reliance on those claims, gave up possession of more than $5,000 in Medicaid funds.

COUNT III

Charge: Theft by False Representation
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): 09/26/2022 to 03/13/2023

Control #(ICR#): 20240004

Charge Description: On or about warrant dates September 26, 2022 through March 13, 2023 in Ramsey County, State of Minnesota, Defendant Letrice Marie Spigner (DOB 03/05/1975) 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 created false timesheets which were submitted as claims to Medica, who, in reliance on those claims, gave up possession of more than $5,000 in Medicaid funds.

COUNT IV

Charge: Theft by False Representation
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): 03/28/2022 to 09/12/2022

Control #(ICR#): 20240004

Charge Description: On or about warrant dates March 28, 2022 through September 12, 2022 in Ramsey County, State of Minnesota, Defendant Letrice Marie Spigner (DOB 03/05/1975) 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 created false timesheets which were submitted as claims to Medica, who, in reliance on those claims, gave up possession of more than $5,000 in Medicaid funds.

COUNT V

Charge: Theft by False Representation
Minnesota Statute: 609.52.2(a)(3)(iii), with reference to: 609.52.3(3)(a)
Maximum Sentence: Imprisonment for not more than five years or to payment of a fine of not more than $10,000, or both
Offense Level: Felony

Offense Date (on or about): 02/10/2022 to 03/10/2022

Control #(ICR#): 20240004

Charge Description: On or about warrant dates February 10, 2022 through March 10, 2022 in Ramsey County, State of Minnesota, Defendant Letrice Marie Spigner (DOB 03/05/1975) 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 created false timesheets which were submitted as claims to Medica, who, in reliance on those claims, gave up possession of more than $1,000 in Medicaid funds.

The Complainant states that the following facts establish probable cause:

Your affiant, Kristopher Knodle, is an Investigator with the Medicaid Fraud Control Unit (MFCU) of the Minnesota Attorney General's Office. As 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 Letrice Marie Spigner (DOB 3/5/1975) (SPIGNER), the defendant herein, and SPIGNER's work as a Personal Care Assistant. I determined that SPIGNER defrauded the Medicaid program by submitting time sheets for services that she did not provide. As a result of these false claims, Medica and the Minnesota Department of Human Services (DHS) paid out $77,518.86 in Medicaid funds, $56,257.75 of which was paid to SPIGNER 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), which is located in St. Paul, Minnesota. 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, 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 includes 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 time sheet. The PCA then submits the time sheets to the Agency, which bills Medica or DHS (sometimes both) for services based on the information reported in the time sheet. Medica or DHS will pay the Agency, which is known as the warrant date, and the Agency pays the PCA. Thus, when fraud occurs, the warrant date represents the taking of government funds.

Homemaker services are also covered by Medicaid. Homemaker services are provided to recipients for their home management and cleaning needs. Like PCA services, Homemaker services must be documented on a time sheet and provided in the recipient's home. The time sheets reflect the type of Homemaker service that is being provided.

II. Spigner's Fraud

On warrant dates from February 10, 2022, through April 9. 2024, SPIGNER reported she provided PCA services to D.J., J.S. and A.S. (Medicaid recipients are identified by their initials to protect their privacy) at their residences through Spigner's employer, an Agency DBA Accra Care, Inc.; Accra FMS LLC, or Accra Care (Accra).

Accra's time sheets include two separate types of work; for PCA services and Homemaker Basic services. During the relevant time periods, SPIGNER regularly reported working full-time as a PCA (40 hours per week) and additional hours (often 3 hours per week) providing Homemaker services. All of the time sheets have a statement regarding falsifying information on the time sheets. The Accra time sheets are signed by SPIGNER and state that by signing, the provider verifies the recorded hours are true and accurate and that it is a crime to provide materially false information.

Time sheet records obtained by MFCU from two of SPIGNER's employers show that during the same time periods SPIGNER reported that she was providing service to recipients, she was actually working onsite for Unlimited Possibilities, in Crystal, MN.

On January 13, 2025, two investigators from the MFCU interviewed SPIGNER at a public library. Investigators showed SPIGNER examples of her time sheet records that MFCU had obtained from Accra and Unlimited. SPIGNER acknowledged that the time sheets were a record of her being at two places at the same time and agreed that this was not possible. SPIGNER was asked which set of time sheet records were the most accurate, Spigner stated the Unlimited time records were accurate because if she did not show up to the work site, the supervisor would have known.

During a two-week period from 10/23/2022 through 11/5/2022, the time records showed that SPIGNER worked 14 straight days for Accra servicing D.J., and for Unlimited at the same time. SPIGNER could not offer an explanation as to how she did not notice this consistent overlap for two weeks. The investigator told SPIGNER that he had other records showing that the overlap went on more than just a couple of times and it went on for several months. SPIGNER stated that she believed the overlap should be isolated to the fourth quarter of 2022. Despite this statement, records obtained by MFCU show that the claimed work overlapped for more than two years.

Count 1

For example, in the relevant time period for Count 1, SPIGNER signed and submitted a time sheet to Accra reporting that she provided PCA services to D.J. at his home in Minneapolis from 10 a.m. to 3:45 p.m. on October 22, 2023. Unlimited records from the same day show that SPIGNER was working at the Unlimited facility in Crystal from 8:54 a.m. to 8:42 p.m.

On December 11, 2023 Medica paid (warrant date) Accra for PCA services that SPIGNER could not have provided because she was at another job in another city. This is one of many examples between warrant dates October 12, 2023, and April 9, 2024, where Medica or DHS made payments because SPIGNER submitted time sheets falsely reporting that she was providing services to D.J., A.S. and J.S. when in fact she was not. As a result of these falsely reported services, Medica and DHS paid over $13,000 to Accra, of which SPIGNER received more than $10,000 in wages for services she did not provide.

Count 2

Additional examples of SPIGNER's fraud are found during the charging period for Count 2. SPIGNER signed and submitted a time sheet to Accra reporting that she provided PCA services to D.J. at his home in Minneapolis from 10 a.m. until 3:45 p.m. on June 4, 2023 and June 11, 2023. Additionally, SPIGNER signed and submitted a time sheet to Accra for Homemaker services declaring that she provided Homemaker services from 4 p.m. to 7 p.m. on June 4, 2023, and June 11, 2023. Unlimited's records show time sheets with SPIGNER working at the Unlimited facility in Crystal from 8:48 a.m. to 9:31 p.m. on June 4 and from 7:59 a.m. to 9:04 p.m. on June 11.

On July 17, Medica paid (warrant date) Accra for PCA and Homemaker services that SPIGNER could not have provided because she was at another job in another city. These are two examples of many between warrant dates March 27, 2023, and September 21, 2023, where Medica or DHS made payments as a result of SPIGNER submitting time sheets falsely reporting that she was providing services to D.J. and

J.S. when in fact she was not. As a result of these falsely reported time sheets, Medica and DHS paid over $24,000 to Accra, of which SPIGNER received more than $15,000 in wages for services she did not provide.

Count 3

As an example of SPIGNER's conduct during the relevant charging period for Count 3, SPIGNER signed and submitted a time sheet to Accra reporting that on October 23, 2022 and October 30, 2022 she provided PCA services to D.J. at his home in Minneapolis from 10 a.m. until 3:45 p.m. on both days. Additionally, SPIGNER signed and submitted a time sheet to Accra for Homemaker Services declaring that she provided Homemaker services from 4 p.m. to 7 p.m. on both days. However, Unlimited's records show that on October 23, 2022, SPIGNER was working in Crystal from 7:37 a.m. until 9:04 p.m. Likewise, Unlimited's records for October 30, 2022 show that she was working in Crystal from 7:28 a.m. to 8:52 p.m.

On December 5, 2022, Medica paid (warrant date) Accra for PCA and Homemaking services, which SPIGNER did not provide. These are just two examples out of many occurring between September 26, 2022, and March 13, 2023, where Medica made payments as a result of SPIGNER submitting time sheets that falsely reported that she was providing services to D.J. while she was working at Unlimited. As a result of these falsely reported time sheets, Medica paid over $18,000 to Accra for services that were not provided, and SPIGNER received over $14,000 in wages for services she did not provide.

Count 4

As an example of SPIGNER's conduct during the relevant charging period for Count 4, SPIGNER signed and submitted a time sheet to Accra reporting that on June 19, 2022, she provided PCA services to D.J. at his home in Minneapolis from 10 a.m. until 3:45 p.m. and Homemaker services from 4 p.m. to 7 p.m. Unlimited's records on June 19 show a time sheet for SPIGNER reporting that she was working in Crystal from 9:10 a.m. to 9:12 p.m.

On August 1, 2022, Medica paid (warrant date) Accra for PCA and Homemaker services, which SPIGNER did not provide. This is one example of many between March 28, 2022 and September 12, 2022 where Medica made payments as a result of SPIGNER submitting time sheets that falsely reported she was providing services to D.J. when in fact she was working at Unlimited. For these falsely reported times, Medica paid over $18,000 to Accra for services that were not provided, and SPIGNER received over $14,000 in wages for work she did not do.

Count 5

As an example of SPIGNER's conduct during the relevant charging period for Count 5, SPIGNER signed and submitted a time sheet to Accra reporting that on February 7, 2022, she provided PCA services to D.J. at his home in Minneapolis from 10 a.m. to 3:45 p.m. and Homemaker services from 4 p.m. to 7 p.m. Also on February 7, Unlimited records show that SPIGNER was working at the Unlimited facility in Crystal from 9:44 a.m. to 9:03 p.m.

On March 10, 2022 Medica paid (warrant date) Accra for PCA and Homemaker services based on SPIGNER's false time sheets declaring that she was providing services to D.J. This is one example of many between warrant dates February 10, 2022 and March 10, 2022, SPIGNER was paid for services that she could not have provided to D.J. because she was working at Unlimited. As a result of these falsely reported time sheets, Medica paid Accra more than $2,400 and more than $1,800 to SPIGNER for services that were not provided.

On all time sheets during every charging period SPIGNER signed and acknowledged that it is fraud to report times that were not worked on the time sheets. During the interview with MFCU investigators, SPIGNER further stated that she knew that it is a crime to submit time sheets with false information.

III. Conclusion.

To calculate overlap, I compared SPIGNER's Accra and Unlimited time sheets. I found that SPIGNER submitted PCA time sheets to Accra, reporting services that could not have occurred while she was working at Unlimited. As a result of SPIGNER's false claims, the DHS paid $77,518.86 in Medicaid funds, $56,257.75 of which was paid to SPIGNER as wages. Broken down into charging periods by warrant date (the date on which Medica or DHS, issued payment to the PCA agency for claims submitted for SPIGNER's reported PCA work), the overpayment by Medica or DHS, based on SPIGNER's conduct is as follows:

Count	Warrant Dates	Overpayment to Agency	Overpayment in Wages
1	October 12, 2023 – April 9, 2024	$13,642.10	$10,544.00
2	March 27, 2023 – September 21, 2023	$24,355.86	$15,232.00
3	September 26, 2022 – March 13, 2023	$18,690.88	$14,529.25
4	March 28, 2022 – September 12, 2022	$18,362.34	$14,062.50
5	February 10, 2022 – March 10, 2022	$2,467.68	$1,890.00
Total	February 10, 2022 – April 9, 2024	**$77,518.86**	**$56,257.75**

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	Kris Knodle Investigator 445 Minnesota Street Suite 1400 St. Paul, MN 55101 Badge: MNAGO	Electronically Signed: 09/25/2026 03:47 PM Sherburne County, Minnesota

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

Prosecuting Attorney	Lee Atakpu 445 Minnesota Street Suite 1400 St. Paul, MN 55101 (651) 296-3353	Electronically Signed: 09/25/2026 03:25 PM

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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 04:14 PM

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

COUNTY OF RAMSEY
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

Letrice Marie Spigner

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:

Filed in District Court
State of Minnesota
9/25/2026

DEFENDANT FACT SHEET

Name:	Letrice Marie Spigner
DOB:	03/05/1975
Address:	3155 Old Highway 8 #102 Minneapolis, MN 55418
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 is prosecuting this case
Alcohol Concentration:	

Filed in District Court
State of Minnesota
9/25/2026

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	10/12/2023	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240004
	Penalty	10/12/2023	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240004
2	Charge	3/27/2023	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240004
	Penalty	3/27/2023	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240004
3	Charge	9/26/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240004
	Penalty	9/26/2022	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240004
4	Charge	3/28/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105G	N	MN062015A	20240004
	Penalty	3/28/2022	609.52.3(2) Theft - Value over $5,000 or trade secret, explosive, Controlled Substance I or II	Felony	U105G	N	MN062015A	20240004
5	Charge	2/10/2022	609.52.2(a)(3)(iii) Theft-Medical costs	Felony	U105H	N	MN062015A	20240004
	Penalty	2/10/2022	609.52.3(3)(a) Theft - Value of property or services $1001 - $5,000	Felony	U105H	N	MN062015A	20240004