

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No.  
Court File No.

33.EQ02.0227

---

**State of Minnesota,**

Plaintiff,

**COMPLAINT**

Summons

vs.

**TRENEA DESHAWN DAVIS DOB: 07/15/1974**

6835 Colfax Avenue N  
Brooklyn Center, MN 55430

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: Aiding and Abetting Theft by Swindle (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 03/31/2020 to 09/29/2020

Control #(ICR#): 20200085

Charge Description: On or about warrant dates March 31, 2020 through September 29, 2020 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to intentionally obtain property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property was over \$35,000, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to CareGood Home Health Care LLC for services that were not provided and/or were non-covered by the Medicaid program. CareGood submitted those claims to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of \$70,047.45.

**COUNT II**

**Charge: Aiding and Abetting Theft by Swindle (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 10/01/2019 to 03/17/2020

Control #(ICR#): 20200085

Charge Description: On or about warrant dates October 1, 2019 through March 17, 2020 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to intentionally obtain property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property was over \$35,000, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to CareGood Home Health Care LLC and Hana Professional Home Health Care for services that were not provided and/or were non-covered by the Medicaid program. CareGood and Hana submitted those claims to the Minnesota Department of Human Services, who, in reliance on those claims, gave up possession of \$46,728.85.

### COUNT III

**Charge: Aiding and Abetting Theft by Swindle (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 03/19/2019 to 09/17/2019

Control #(ICR#): 20200085

Charge Description: On or about warrant dates March 19, 2019 through September 17, 2019 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to intentionally obtain property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property was over \$35,000, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Hana Professional Home Health Care, Intercommunity Home Health Care Inc., and Alpha Home Care, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Hana, Intercommunity, and Alpha submitted those claims to the Minnesota Department of Human Services and Medicaid Managed Care Organization Blue Cross Blue Shield, who, in reliance on those claims, gave up possession of \$98,364.30.

### COUNT IV

**Charge: Aiding and Abetting Theft by Swindle (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 10/30/2018 to 03/05/2019

Control #(ICR#): 20200085

Charge Description: On or about warrant dates October 30, 2018 through March 5, 2019 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally obtained property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property was over \$35,000, to wit: intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to intentionally obtain property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property was over \$35,000, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Intercommunity Home Health Care Inc. and Alpha Home Care, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Intercommunity and Alpha submitted those claims to the Minnesota Department of Human Services and Medicaid Managed Care Organization Blue Cross Blue Shield, who, in reliance on those claims, gave up

possession of \$78,813.30.

### COUNT V

**Charge: Aiding and Abetting Theft by Swindle (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 03/06/2018 to 08/31/2018

Control #(ICR#): 20200085

Charge Description: On or about warrant dates March 6, 2018 through August 31, 2018 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely, to intentionally obtain property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property was over \$35,000, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Unicare Home Health Services, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Unicare submitted those claims to the Minnesota Department of Human Services, and Medicaid Managed Care Organizations Blue Cross Blue Shield and UCare who, in reliance on those claims, gave up possession of \$63,028.35.

### COUNT VI

**Charge: Aiding and Abetting Theft by False Representation (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(3), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 08/22/2017 to 02/21/2018

Control #(ICR#): 20200085

Charge Description: On or about warrant dates August 22, 2017 through February 21, 2018 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely deceiving 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 more than \$35,000 of property of another, 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, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Unicare Home Health Services, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Unicare submitted those claims to the Minnesota Department of Human Services and Medicaid Managed Care Organization UCare who, in reliance on those claims, gave up possession of \$70,092.84.

### COUNT VII

**Charge: Aiding and Abetting Theft by False Representation (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(3), with reference to: 609.52.3(1), 609.05.1

Maximum Sentence: Imprisonment of no more than 20 years, or payment of a fine of no more than

\$100,000, or both.  
Offense Level: Felony

Offense Date (on or about): 02/14/2017 to 08/08/2017

Control #(ICR#): 20200085

Charge Description: On or about warrant dates February 14, 2017 through August 8, 2017 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely deceiving 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 more than \$35,000 of property of another, 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, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Unicare Home Health Services, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Unicare submitted those claims to the Minnesota Department of Human Services, and Medicaid Managed Care Organizations Blue Cross Blue Shield and Medica who, in reliance on those claims, gave up possession of \$49,668.40.

### COUNT VIII

**Charge: Aiding and Abetting Theft by False Representation (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(3), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 08/09/2016 to 02/07/2017

Control #(ICR#): 20200085

Charge Description: On or about warrant dates August 9, 2016 through February 7, 2017 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely deceiving 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 more than \$35,000 of property of another, 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, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Unicare Home Health Services, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Unicare submitted those claims to the Minnesota Department of Human Services, and Managed Care Organizations Blue Cross Blue Shield and Medica who, in reliance on those claims, gave up possession of \$105,024.58.

### COUNT IX

**Charge: Aiding and Abetting Theft by False Representation (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(3), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 02/09/2016 to 08/05/2016

Control #(ICR#): 20200085

Charge Description: On or about warrant dates February 9, 2016 through August 5, 2016 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely deceiving 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 more than \$35,000 of property of another, 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, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Unicare Home Health Services, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Unicare submitted those claims to the Minnesota Department of Human Services, and Medicaid Managed Care Organizations Blue Cross Blue Shield, UCare and Medica who, in reliance on those claims, gave up possession of \$86,498.52.

### COUNT X

**Charge: Aiding and Abetting Theft by False Representation (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(3), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 07/27/2015 to 01/26/2016

Control #(ICR#): 20200085

Charge Description: On or about warrant dates July 27, 2015 through January 26, 2016 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely deceiving 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 more than \$35,000 of property of another, 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, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Unicare Home Health Services, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Unicare submitted those claims to the Minnesota Department of Human Services and Medicaid Managed Care Organization UCare who, in reliance on those claims, gave up possession of \$83,779.84.

### COUNT XI

**Charge: Aiding and Abetting Theft by False Representation (Over \$35,000.00)**

Minnesota Statute: 609.52.2(a)(3), with reference to: 609.52.3(1), 609.05.1

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

Offense Level: Felony

Offense Date (on or about): 01/27/2015 to 07/15/2015

Control #(ICR#): 20200085

Charge Description: On or about warrant dates January 27, 2015 through July 15, 2015 in Hennepin County, State of Minnesota, Defendant TRENEA DESHAWN DAVIS (dob 07/15/1974), intentionally aided, abetted, advised, hired, counseled, or conspired with another to commit a crime, namely deceiving 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 more than \$35,000 of property of another, 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, to wit: DAVIS intentionally conspired with others to submit Personal Care Assistant claims for reimbursement to Unicare Home Health Services, Inc. for services that were not provided and/or were non-covered by the Medicaid program. Unicare submitted those claims to the Minnesota Department of Human Services and Medicaid Managed Care Organization UCare who, in reliance on those claims, gave up possession of \$111,124.16.

## STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your affiant, Diane Castro, is an investigator with the Medicaid Fraud Control Unit (MFCU) of the Minnesota Attorney General's Office. As a MFCU investigator, I investigate allegations of fraud by health care providers enrolled in the Minnesota Medical Assistance (Medicaid) program. In this capacity, I investigated Trenea Deshawn Davis (dob 7/15/1974) (DAVIS), Frances Ann Finklea (02/05/1992) (FINKLEA), Virleka Daynae Parker (07/19/1990) (PARKER), Brianna Renae Foss (06/25/2000) (FOSS), Cedric Joseph Zeno (11/09/1967) (ZENO), Marc Anthony Zeno (05/21/1965) (MARC ZENO), Elbridge Coby Johnson (10/16/1972) (JOHNSON), and Bobby Lamar Mayweather (08/24/1987) (MAYWEATHER) (collectively, the co-defendants). I determined that DAVIS defrauded the Medicaid program by signing and submitting timesheets for personal care assistance (PCA) services that DAVIS was not eligible to provide or receive. In addition, I determined that DAVIS coordinated a large-scale PCA fraud scheme involving numerous family members and friends, including FINKLEA, PARKER, FOSS, ZENO, MARC ZENO, JOHNSON, MAYWEATHER and others. These individuals have collectively reported providing and receiving over \$1.47 million of PCA services since 12/01/2014.

DAVIS and her co-conspirators entered into agreements to sign and submit timesheets for PCA services that were not provided. In furtherance of this fraudulent scheme, DAVIS coached family members and friends to feign or exaggerate medical conditions to qualify them as recipients of PCA services. DAVIS also recruited PCAs who represented that they were providing services to the recipients, when in fact, no services were provided. To avoid suspicion, during statutory-required Qualified Professional visits with a Registered Nurse, the co-defendants reported that PCA services were being provided in accordance with recipients' Care Plans.

DAVIS and others submitted fraudulent timesheets to PCA provider agencies Unicare Home Health Services, Inc. (Unicare), Alpha Home Care, Inc. (Alpha), CareGood Home Health Care, LLC (CareGood), Intercommunity Home Health Care, Inc. (Intercommunity), and Hana Professional Home Health Care (Hana). The agencies then submitted PCA claims to the Minnesota Department of Human Services and Medicaid Managed Care Organizations Blue Cross Blue Shield, UCare, and Medica, which paid \$1,478,461.55 in Medicaid funds to the agencies during the charging period, a portion of which DAVIS's ring of fraudulent PCAs received in wages.

### **I. The Medicaid Program**

The Medicaid program provides medical care and services to Minnesotans who meet income and other eligibility requirements (recipients). The Medicaid program is administered by the Minnesota Department of Human Services (DHS) and health care providers wishing to furnish health care services and goods to recipients must enroll in the Medicaid program by entering into an agreement with DHS. Providers then submit claims directly to DHS to receive reimbursement for their services—this arrangement is known as fee for service. DHS also contracts with managed care organizations (MCOs) to cover the costs of Medicaid recipients' services on a managed care basis. When a recipient receives coverage through an MCO, providers submit claims directly to the MCO, rather than to DHS.

Providers are informed of the rules and regulations governing participation in the Medicaid program, including billing procedures and personnel requirements, through the Minnesota Health Care Programs (MHCP) Provider Manual. 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. As required by federal law, the MHCP prohibits providers 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.

Medicaid covers PCA services, which include assistance with activities of daily living like dressing, grooming, bathing, eating, mobility, and toileting. To qualify for PCA services, a recipient must undergo an assessment by a county public health nurse (PHN) whose role is to determine the need for services, identify appropriate services, evaluate the effectiveness of services, and provide information on different personal care assistance service options. A recipient who qualifies for personal care assistance services may hire a PCA provider agency to furnish those services. The PCA provider agency acts as an intermediary between the recipient and DHS: the PCA provider agency hires or contracts with PCAs to provide services in the home of the Medicaid recipient, and the PCA provider agency contracts with DHS to provide services to the recipient.

Minnesota law requires that PCAs document their work on timesheets. Documentation requirements include the date of service, the PCA's name, the recipient's name, the PCA's arrival and departure time (including a.m. and p.m. designations), the total number of hours worked daily, a description of the services provided, and any shared care provided to the recipient, if applicable. Both the PCA and the recipient must sign the timesheets to verify the hours of service. The timesheets are submitted to the PCA provider agency, and the PCA is paid wages based on the hours claimed on the submitted timesheets. If a recipient is a minor or unable to direct his or her own care, a responsible party (RP) is appointed to direct and supervise the recipient's care and review and sign PCA timesheets to verify that services have been provided. Using the data from the PCA timesheets, the PCA provider agency submits claims for reimbursement to DHS and MCOs.

Pursuant to Minnesota law, a person cannot provide PCA services to his or her spouse. A responsible party (RP), who is appointed to direct and oversee PCA care for a recipient who cannot manage his or her own affairs, similarly is prohibited by law from providing PCA services to that person.

## **II. DAVIS'S PCA FRAUD SCHEMES**

### **A. Fraud at Unicare**

#### **1. Davis signed and submitted timesheets for PCA services that she was not eligible to provide because she was either the recipient's spouse or responsible party.**

DAVIS worked as a PCA through Unicare from 2014 to 2018. From 12/11/2014 to 1/31/2018, DAVIS claimed to have provided over 2,000 hours of PCA services to her husband Cedric Zeno Sr. (ZENO). As noted above, under Minnesota law a person cannot provide personal care assistance services to his or her spouse. DAVIS and ZENO were married in 2010 and live together at 6835 Colfax Ave. N., Brooklyn Center, MN 55430 (the DAVIS/ZENO home). In an interview, DAVIS repeatedly denied that ZENO and she were married. DAVIS later acknowledged that she knew that personal care assistance services cannot be provided by a recipient's spouse and that she took steps to conceal her marriage to ZENO. Davis also said that the owner of Unicare, Ali Warsame, told her that no one would find out about her marriage because DAVIS and ZENO were married in Louisiana.

While working for Unicare, DAVIS claimed to have provided over 4,146 hours of PCA services to the following people, all of whom are either related to or friends with DAVIS: Alva Cooper, ZENO, D.D., and A.Z. However, DAVIS was also the RP for each of these individuals and, as noted above, Minnesota law prohibits a person from being both a PCA and a RP for a recipient due to an inherent conflict of interest. DAVIS's PCA claims would never have been reimbursed by DHS or MCOs had they known that DAVIS was the spouse and RP of ZENO and the RP of Alva Cooper, ZENO, D.D. and A.Z.

As a result of this fraud scheme, DHS and the MCO Medica paid out \$71,017.79 in Medicaid funds.

## **2. Davis falsely represented that she provided PCA services.**

While working for Unicare, DAVIS claimed to have provided over 7,000 hours of PCA services to at least 7 different recipients. During interviews, several of DAVIS's purported recipients told me that DAVIS never actually provided them with any services, including Alva Cooper (Cooper). Cooper was a friend of DAVIS, dated DAVIS's brother for many years, and lived at the DAVIS/ZENO home. In an interview, Cooper said that DAVIS signed PCA timesheets claiming to have provided Cooper with services, but that DAVIS never actually provided her with any services.

DAVIS also claimed to have provided PCA services to Elbridge Johnson (JOHNSON) and Paula Jackson through Unicare. JOHNSON and Jackson are friends of DAVIS and JOHNSON lived at the DAVIS/ZENO home. From 01/01/2016 to 06/22/2016, DAVIS purported to have provided 582 hours of PCA services to JOHNSON through Unicare. From 04/13/2016 to 02/15/2017, DAVIS purported to have provided over 1,333 hours of PCA services to Jackson through Unicare. In separate interviews, both Johnson and Jackson indicated that DAVIS never provided them with any services.

## **3. Davis recruited her family and friends to falsely represent that they provided and received PCA services.**

Charlie Parker, DAVIS's brother, is one of several people that DAVIS recruited to work as a PCA through Unicare. From 05/26/2016 to 03/01/2017, Parker purported to have provided 2,209 hours of PCA services through Unicare, which resulted in claims reimbursement of \$33,956.20 to Unicare. In an interview, Parker said that DAVIS asked Parker to work as a PCA for people living at the DAVIS/ZENO home, but that he never actually provided anyone with any services. Rather, Parker said that he and DAVIS had an arrangement by which DAVIS would fill and sign timesheets for services that Parker did not provide, and that DAVIS and Parker had a check-splitting arrangement by which Parker received \$200 from his paychecks and DAVIS would keep the rest of the money.

As noted earlier, Paula Jackson is a friend of DAVIS. In an interview, Paula Jackson said that DAVIS offered to "put a little extra cash in [Jackson's] pocket" if Jackson worked at Unicare. From 06/25/2015 to 03/30/2016, Jackson purported to have provided over 2,096 hours of PCA services through Unicare to the following people, all of whom are either related to or friends with DAVIS: ZENO, D.D., J.D., and R.S. In an interview, Jackson could not name any of the recipients that she purportedly worked for through Unicare and when I asked Jackson whether she actually provided services to anyone through Unicare, Jackson responded, "No, honestly." Jackson further said that sometimes she would sign her timesheets, and other times DAVIS would sign. Jackson also said that most of the time DAVIS would receive Jackson's PCA paycheck from Unicare, and that the two had a check-splitting arrangement and would go together to the bank to cash and split checks. Jackson said that "[s]ometimes the check was like a thousand or thirteen hundred and [DAVIS] would give me like three hundred."

Another purported PCA that DAVIS recruited to work at Unicare was Jerome Jackson, who also worked for Alpha under DAVIS's scheme. Jerome Jackson is a friend of DAVIS's family and Paula Jackson's husband. From 03/03/2016 to 01/16/2019, Jackson purported to have provided 5,531 hours of PCA services to the following people, all of whom are either related to or friends with DAVIS: ZENO, C.Z.Jr., D.D., J.D., JOHNSON, K.Z., MARC ZENO, Paula Jackson and R.S. DAVIS was the RP for ZENO, C.Z.Jr., J.D., and D.D. As such, DAVIS was responsible for directing and supervising their PCA care and reviewing and signing their PCA timesheets to verify that services were provided.

In an interview, Jackson said DAVIS introduced him to Unicare. Jackson also said that he never provided any services to ZENO or JOHNSON and further said that the only person that he ever provided services to

at the DAVIS/Zeno home was a “young girl” whose name he could not remember. When I showed Jackson a photograph of one of his purported recipients, K.Z., Jackson’s response was “I don’t know the person.” Jackson also admitted to signing blank PCA timesheets and said that he and DAVIS had an arrangement to split the wages that Jackson received for PCA services he did not provide. Specifically, Jackson said that he would cash his PCA paychecks, give DAVIS the money, and then DAVIS would typically give Jackson one third of the money from the paychecks and DAVIS kept the rest for herself.

In an interview, DAVIS largely admitted to engaging in the above-described scheme. DAVIS said that she recruited several of her friends and family members to be PCAs and recipients at Unicare. DAVIS also said that she assisted recipients in obtaining authorizations from PHNs to receive more PCA hours than recipients actually needed. DAVIS further said that the timesheets detailing services that were purportedly provided to DAVIS’s family members and friends that lived at the DAVIS/ZENO home did not accurately reflect the services that were provided. As noted above, both the PCA and the recipient must sign the timesheets to verify the hours of service. DAVIS, however, said that she and others would often fill out and sign the timesheets for the PCAs and recipients that DAVIS recruited to Unicare.

DAVIS also detailed how the fraudulently obtained PCA wages were split between herself, PCAs, and recipients. As noted above, health care providers, including PCAs, are prohibited from offering any kind of kickback, such as cash, merchandise, or other goods or services to a recipient to induce the recipient to receive services from the PCA. Nevertheless, DAVIS said that the PCAs that she recruited to Unicare regularly paid recipients between \$100 to \$200 from paychecks. DAVIS further said that the PCAs that lived at the DAVIS/ZENO home would compensate DAVIS by paying bills and rent and that the PCAs that did not live at the DAVIS/ZENO home would provide DAVIS cash from their paychecks. DAVIS said she would often travel with PCAs to banks where they would cash and split the fraudulently obtained PCA wages. DAVIS estimated that, in addition to having her bills and rent paid by fraudulently obtained PCA wages, she received approximately \$1,200 to \$2,000 per month in cash from PCAs and approximately another \$400 in cash each month in kickbacks from the owner of Unicare.

DAVIS and ZENO are originally from Louisiana, and I learned through interviews that DAVIS’s affiliation to most of the PCAs and recipients involved in her scheme were through her connection to Louisiana. In an interview, Alva Cooper, said DAVIS was called the “PCA Queen” by people in Louisiana and that when DAVIS and ZENO originally moved from Louisiana to Minnesota, ZENO wanted DAVIS to “learn the system.” Both PCAs and recipients would often move to and from Louisiana and DAVIS admitted in an interview that she and MAYWEATHER signed timecards for D.J after D.J moved back to Louisiana. From 01/08/15 to 05/29/15, Brittany Kennard claimed to provide services to recipient D.P. when D.P was receiving Medicaid services in Louisiana. Through my research, I identified 22 individuals involved in DAVIS’s scheme to either have a Minnesota identification Card, a Minnesota Drivers License, or record in the Minnesota Medicaid Information System to have their residential address recorded to the DAVIS/ZENO home.

As a result of DAVIS and others’ PCA fraud schemes, Unicare received \$569,216.69 in Medicaid funds

## **B. Fraud at Alpha, CareGood, Intercommunity, and Hana.**

After Unicare went out of business in 2018, DAVIS conspired with her family members and friends to sign and submit timesheets for PCA services that were not provided through several different agencies including: Alpha, CareGood, Intercommunity, and Hana. Shortly before Unicare closed, DAVIS switched from purporting to be a PCA to purporting to be a recipient. From 10/5/2018 to 8/31/2020, DAVIS claimed to have received over 3,926 hours of PCA services from her family members and friends through CareGood, Intercommunity, and Hana. In an interview, DAVIS said that she did not actually receive any PCA services and that the people that were purportedly providing her with PCA services would come to her house for “social visits,” and would do things such as feed the dogs and make dinner.

Amber Kaslow is a purported PCA that DAVIS recruited to provide services at CareGood. Kaslow has a child with DAVIS's nephew. From 1/30/2020 to 7/29/2020, Kaslow purported to have provided 1,629 hours of PCA services through CareGood to DAVIS's husband and nephew. In an interview, Kaslow said that while she was supposed to be providing personal care assistance services at the DAVIS/ZENO home, she never actually provided any services. Kaslow said that she and DAVIS had an arrangement by which DAVIS would fill and sign timesheets for services that were not provided, and that Kaslow and DAVIS would split the fraudulently obtained wages. Kaslow said that she received \$250 from her paychecks and that DAVIS kept the rest of the money. Kaslow also said that she became a PCA because DAVIS offered to help Kaslow get a job, and that when Kaslow started working as a PCA she did not know that she would get paid for not providing any services.

In an October 5, 2020 interview, ZENO said that he had not received any PCA services in over a year. Nevertheless, from October 1, 2019 to September 23, 2020, 3 of DAVIS's friends claimed to have provided 2,031 hours of PCA services to ZENO through CareGood, and Hana.

As a result of DAVIS and others' fraudulent PCA timesheets, Alpha, CareGood, Intercommunity, and Hanna received \$293,953.90 in Medicaid funds.

### **III. THE CO-DEFENDANTS' ROLES IN DAVIS'S PCA FRAUD SCHEMES**

#### **A. Virleka Parker.**

Virleka Parker (PARKER), DAVIS's niece who lived with her throughout the charging period, falsely represented that she provided over 12,256 hours of PCA services to DAVIS, ZENO, MARC ZENO, C.Z.Jr., J.D., D.D., JOHNSON, R.S., Paula Jackson and Cooper. In an interview, Alva Cooper told me that she never received any services from PARKER.

In an interview, PARKER stated that "based on her knowledge," the only person she has ever provided PCA services to was DAVIS. When I showed PARKER photographs of Elbridge JOHNSON, and R.S., two of PARKER's purported PCA recipients, PARKER said that she did not know either of the individuals in the photographs. PARKER did identify a photograph of purported PCA recipient Paula Jackson, but said she did not provide her any PCA services. PARKER further did not identify providing services to C.Z. Jr., despite reporting to provide over 6,611 hours of services to him.

Another of PARKER's purported recipients was J.D, DAVIS's nephew. According to PARKER and others' PCA timesheets, J.D. required assistance with activities of daily living such as dressing, grooming, bathing, eating and toileting. According to my research and review of J.D.'s Hudl and MaxPreps football videos, J.D. was a quarterback at Champlin Park High School. J.D. had 5,097 hours of services submitted during the charging period, resulting in a \$87,961.76 loss to the Medicaid program.

PARKER further stated that she provides 4.27 hours per day of services to DAVIS. As noted earlier, DAVIS told me that she has not received any PCA services. DAVIS also said in an interview that she brought PARKER into to the scheme and that PARKER would use her fraudulently obtained wages to pay bills at the DAVIS/ZENO home.

Charlie Parker lived at the DAVIS/ZENO home with DAVIS and PARKER. In an interview, Charlie Parker said that PARKER had an arrangement with DAVIS to fraudulently obtain PCA wages for services that were not provided. Charlie Parker also said that himself, PARKER, and DAVIS had traveled together to the bank to cash PCA paychecks.

As a result of PARKER and others' fraudulent PCA timesheets, Unicare, Alpha, CareGood, Hana received

\$201,274.74 in Medicaid funds, \$147,231.64 of which PARKER received in wages.

### **B. Briana Foss.**

Another purported PCA that DAVIS recruited to work at CareGood was Brianna Foss (FOSS), the significant other of DAVIS's nephew. FOSS falsely represented that she provided 1,183 hours of services to DAVIS, ZENO and J.D. through Caregood from April 23, 2020 to September 23, 2020. As noted earlier, DAVIS said that she never received any PCA services. During an October 2020 interview that was conducted by MFCU Investigator Kris Knodle (Knodle) and me, FOSS could not tell me the name of the company she worked for as a PCA or where it was located. She also did not know how many hours a week she worked, nor could she tell me how much she earned as a PCA for CareGood. She did not identify DAVIS as one of her recipients, and gave conflicting information about how often and how many hours a week she worked. For instance, she initially said it had been a while since she had worked for Cedric Zeno Sr., but later in the interview, stated she had been providing services to Cedric Zeno Sr. earlier that day, from 7am to 10 or 11am. In fact, Inv. Knodle and I had arrived at the DAVIS/ZENO home at approximately 9:45am and had observed FOSS arrive in a vehicle around 2:00 pm after we began interviewing DAVIS and others.

As discussed above, during an interview with Zeno Sr. the same day, he stated he had not received PCA services in about a year. DAVIS identified FOSS as one of the PCAs involved in her scheme and said she "put [FOSS] on" to help her out.

As a result of FOSS and others' fraudulent PCA timesheets, CareGood received \$21,057.40 in Medicaid funds, \$15,260.70 of which FOSS received in wages.

### **C. Frances Finklea.**

Frances Finklea (FINKLEA), a friend of DAVIS, was also identified by DAVIS as an individual who completed PCA timesheets for services she did not provide through CareGood, Hana, and Intercommunity. DAVIS said FINKLEA came to her because she needed money to help pay for her wedding, and DAVIS agreed to help her out. FINKLEA claimed to provide over \$57,000 of PCA services to ZENO, C.Z.Jr., D.J., and DAVIS. Yet, during an interview, FINKLEA stated her only recipients were ZENO and C.Z.Jr. Moreover, despite reporting to provide daily PCA services in the DAVIS/ZENO home for almost two years, FINKLEA did not know their address and could not tell Inv. Knodle and me the color of the exterior of the home. When shown a photograph of FINKLEA, PARKER stated she had never seen FINKLEA do any PCA work in the DAVIS/ZENO home.

As a result of FINKLEA's and others' fraudulent PCA timesheets, CareGood, Hana, and Intercommunity received \$57,468.70 in Medicaid funds, \$40,522.70 of which FINKLEA received in wages.

### **D. Cedric Zeno Sr.**

During the charging period, ZENO was reported to receive over 10,224 hours of PCA services from a number of PCAs involved in the co-defendants' PCA fraud scheme, including Kaslow, FOSS, MARC ZENO, Charlie Parker, Jerome and Paula Jackson, FINKLEA, DAVIS, and PARKER. The Medicaid program paid ZENO's PCA agencies \$177,054.28 for these claims, \$125,026.80 of which DAVIS and others received in wages.

As discussed above, Kaslow and Jerome and Paula Jackson indicated they never provided PCA services to ZENO but instead entered into agreements with DAVIS to falsely report providing services and split the resulting paychecks.

ZENO aided and abetted these individuals in this scheme. To qualify for PCA services, ZENO had to be assessed by a public health nurse every year, during which ZENO and DAVIS represented that ZENO needed assistance with activities of daily living including dressing, grooming, bathing, toileting, transferring, mobility, behavioral issues and others. In May 2016, a public health nurse (PHN) noted inconsistencies between ZENO's reported needs and the PHN's observations. For instance, it was reported that ZENO needed assistance with transfers, yet, the PHN observed ZENO transfer himself off and onto a recliner without assistance or use of adaptive equipment. ZENO was also reported to use a cane, however, the PHN observed him walk in his home without assistance or adaptive equipment.

From 2015 to 2018, ZENO also presented at visits with Unicare's Qualified Professional, during which he represented that he was receiving PCA services, had no concerns or complaints about the services he was receiving, and continued to be in need of PCA services.

According to Jerome Jackson, Paula Jackson, and Charlie Parker, on certain occasions, ZENO drove DAVIS and them to the bank so that PCAs could cash their paychecks and give DAVIS her cut.

Despite reportedly receiving over 10,000 hours of PCA services from December 1, 2014 to September 23, 2020, and despite reporting the inability to dress, groom, bathe, toilet, transfer, and move independently, during a October 5, 2020 interview, ZENO told me that he had not received PCA services in over a year. As discussed above, the Medicaid program paid \$177,054.28 for PCA services purportedly provided to ZENO from 2014 to 2020.

#### **E. Marc Zeno**

MARC ZENO, ZENO's brother and DAVIS's brother-in-law, also participated in the co-defendants' PCA fraud scheme. From 01/08/2015 to 12/28/2017, MARC ZENO was reported to receive daily PCA services from several PCAs, including Jerome Jackson, DAVIS and PARKER. As discussed above, Jerome Jackson, DAVIS and PARKER denied providing MARC ZENO with any PCA services and DAVIS identified MARC ZENO as one of the people she brought into her fraud scheme.

MARC ZENO then swapped roles in the co-defendants' fraud schemes. Instead of falsely reporting that he needed and received PCA services, MARC ZENO falsely reported that he worked as a PCA from 05/10/2018 to 01/16/2020 for recipients that lived in the DAVIS/ZENO home, including DAVIS, ZENO, C.Z.Jr., D.D., and J.D. discussed above, among others.

MARC ZENO aided and abetted his co-defendants in obtaining \$115,769.16 in Medicaid funds from DHS and MCOs Blue Cross Blue Shield and UCare, \$82,000.08 of which the co-defendants received.

#### **F. Elbridge Johnson**

DAVIS told Inv. Knodle and me that JOHNSON was another person she brought into her fraud scheme. Like recipients ZENO and MARC ZENO, JOHNSON underwent assessments with a PHN where he represented that he needed PCA services and was receiving them. He stated the same during at least ten visits with a Unicare QP from 2015-2016.

JOHNSON reportedly received over 1,075 hours of PCA services from the co-defendants and others involved in the fraud scheme, including DAVIS, PARKER, and Jerome Jackson and the Medicaid program paid out \$18,359.48 as a result. DAVIS acknowledged never providing JOHNSON with services, and PARKER did not even recognize him when shown a photograph of him. Jerome Jackson also admitted that he never worked for JOHNSON, instead, signing timesheets and receiving approximately a third of the PCA paychecks for his involvement in the scheme. When asked if he knew his conduct was a crime, Jackson responded "hell yes."

## **G. Bobby Mayweather**

Bobby Lamar Mayweather (MAYWEATHER), a friend of DAVIS, was identified by DAVIS as an individual who DAVIS recruited to complete PCA timesheets for services he did not provide through Intercommunity. From 01/17/2019 to 07/31/2019, MAYWEATHER represented that he provided 1,392 hours of PCA services to DAVIS and D.J. As noted above, in an interview, DAVIS told Inv. Knodle and me that she did not receive PCA services. In addition, DAVIS said that MAYWEATHER lived in the DAVIS/ZENO home, and was the one-time boyfriend of PARKER. DAVIS further said that after MAYWEATHER's purported recipient D.J. left Minnesota to go live in Louisiana, DAVIS and MAYWEATHER conspired to sign and submit timesheets for services that were not provided to D.J. Specifically, DAVIS said that after D.J. moved to Louisiana DAVIS forged D.J.'s signatures on MAYWEATHER's PCA timesheets and that MAYWEATHER gave DAVIS all of the fraudulently obtained wages so that "[DAVIS] could catch back up on [her] bills."

As a result of MAYWEATHER and others' fraudulent PCA timesheets, Intercommunity received \$24,307.20 in Medicaid funds, \$16,704.00 of which MAYWEATHER received in wages.

## **IV. CONCLUSION**

DAVIS, FINKLEA, PARKER, FOSS, ZENO, MARC ZENO, JOHNSON, MAYWEATHER and numerous other individuals engaged in a long-running scheme to bilk the Medicaid program of hundreds of thousands of dollars by signing and submitting timesheets for PCA services that were not provided and in some cases, likely not medically necessary. The co-defendants' fraud ultimately cost the Medicaid program \$863,170.59 during the charging period.

The fraud attributable to DAVIS broken down into six-month increments for charging purposes, is as follows:

	Overpayment to Davis	Overpayment to CareGood	Overpayment to Hana	Overpayment to Intercommunity	Overpayment to Alpha	Overpayment to Unicare
<b>Count I (Warrant Dates: 03/31/20 to 09/29/20)</b>	\$70,047.45	\$70,047.45	\$ -	\$ -	\$ -	\$ -
<b>Count II (Warrant Dates: 10/01/19 to 03/17/20)</b>	\$46,728.85	\$7,476.00	\$39,252.85	\$ -	\$ -	\$ -
<b>Count III (Warrant Dates: 03/19/19 to 09/17/19)</b>	\$98,364.30	\$ -	\$18,298.20	\$71,405.25	\$ 8,660.85	\$ -
<b>Count IV (Warrant Dates: 10/30/18 to 03/05/19)</b>	\$78,813.30	\$ -	\$ -	\$21,201.90	\$57,611.40	\$ -
<b>Count V (Warrant Dates: 03/06/18 to 08/31/18)</b>	\$63,028.35	\$ -	\$ -	\$ -	\$ -	\$63,028.35
<b>Count VI (Warrant Dates: 08/22/17 to 02/21/18)</b>	\$70,092.84	\$ -	\$ -	\$ -	\$ -	\$70,092.84
<b>Count VII (Warrant Dates: 02/14/17</b>	\$49,668.40	\$ -	\$ -	\$ -	\$ -	\$49,668.40

to 08/08/17) Count VIII (Warrant Dates: 08/09/16	\$105,024.58	\$ -	\$ -	\$ -	\$ -	\$105,024.58
to 02/07/17) Count IX (Warrant Dates: 02/09/16	\$86,498.52	\$ -	\$ -	\$ -	\$ -	\$86,498.52
to 08/05/16) Count X (Warrant Dates: 07/27/15	\$83,779.84	\$ -	\$ -	\$ -	\$ -	\$83,779.84
to 01/26/16) Count XI (Warrant Dates: 01/27/15	\$111,124.16	\$ -	\$ -	\$ -	\$ -	\$111,124.16
to 07/15/15) Totals	\$863,170.59	\$77,523.45	\$57,551.05	\$92,607.15	\$66,272.25	\$569,216.69

## 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**

Diane Castro  
Investigative Auditor  
445 Minnesota Street  
Suite 1400  
St. Paul, MN 55101  
Badge: 031017-38

Electronically Signed:  
01/26/2021 10:32 AM  
Hennepin County, Minnesota

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

**Prosecuting Attorney**

James H. Clark III  
Assistant Attorney General  
445 Minnesota Street  
Suite 1400  
St. Paul, MN 55101  
(651) 297-1075

Electronically Signed:  
01/26/2021 10:10 AM

**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: January 26, 2021.

**Judicial Officer**

Luis Bartolomei  
District Court Judge

Electronically Signed: 01/26/2021 12:22 PM

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

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff

vs.

**Trenea Deshawn Davis**

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:** Trenea Deshawn Davis  
**DOB:** 07/15/1974  
**Address:** 6835 Colfax Avenue N  
Brooklyn Center, MN 55430

**Alias Names/DOB:**

**SID:**

**Height:**

**Weight:**

**Eye Color:**

**Hair Color:**

**Gender:** FEMALE

**Race:**

**Fingerprints Required per Statute:** Yes

**Fingerprint match to Criminal History Record:** No

**Driver's License #:**

**Case Scheduling Information:** Prosecutor unavailable for first appearance on 2/2, 2/3, 2/4, 2/5, 2/10, 2/12 in a.m., 2/18, 2/26 in the p.m., and 3/8 in a.m. I would like a first appearance in February, if possible. For efficiency purposes, I would also like the first appearance for all co-defendants to be at the same time.

**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	3/31/2020	609.52.2(a)(4) Theft-By Swindle	Felony	U1069	X	MN062015A	20200085
	Penalty	3/31/2020	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1069	X	MN062015A	20200085
	Modifier	3/31/2020	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1069	X	MN062015A	20200085
2	Charge	10/1/2019	609.52.2(a)(4) Theft-By Swindle	Felony	U1069	X	MN062015A	20200085
	Penalty	10/1/2019	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1069	X	MN062015A	20200085
	Modifier	10/1/2019	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1069	X	MN062015A	20200085
3	Charge	3/19/2019	609.52.2(a)(4) Theft-By Swindle	Felony	U1069	X	MN062015A	20200085
	Penalty	3/19/2019	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1069	X	MN062015A	20200085
	Modifier	3/19/2019	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1069	X	MN062015A	20200085
4	Charge	10/30/2018	609.52.2(a)(4) Theft-By Swindle	Felony	U1069	X	MN062015A	20200085
	Penalty	10/30/2018	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1069	X	MN062015A	20200085
	Modifier	10/30/2018	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1069	X	MN062015A	20200085
5	Charge	3/6/2018	609.52.2(a)(4) Theft-By Swindle	Felony	U1069	X	MN062015A	20200085
	Penalty	3/6/2018	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1069	X	MN062015A	20200085
	Modifier	3/6/2018	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1069	X	MN062015A	20200085
6	Charge	8/22/2017	609.52.2(a)(3) Theft-False Representation	Felony	U1069	X	MN062015A	20200085
	Penalty	8/22/2017	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1069	X	MN062015A	20200085
	Modifier	8/22/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1069	X	MN062015A	20200085
7	Charge	2/14/2017	609.52.2(a)(3) Theft-False Representation	Felony	U1129	X	MN062015A	20200085
	Penalty	2/14/2017	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1129	X	MN062015A	20200085
	Modifier	2/14/2017	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1129	X	MN062015A	20200085
8	Charge	8/9/2016	609.52.2(a)(3)	Felony	U1129	X	MN062015A	20200085

	Penalty	8/9/2016	Theft-False Representation 609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1129	X	MN062015A	20200085
	Modifier	8/9/2016	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1129	X	MN062015A	20200085
9	Charge	2/9/2016	609.52.2(a)(3) Theft-False Representation	Felony	U1129	X	MN062015A	20200085
	Penalty	2/9/2016	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1129	X	MN062015A	20200085
	Modifier	2/9/2016	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1129	X	MN062015A	20200085
10	Charge	7/27/2015	609.52.2(a)(3) Theft-False Representation	Felony	U1129	X	MN062015A	20200085
	Penalty	7/27/2015	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1129	X	MN062015A	20200085
	Modifier	7/27/2015	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1129	X	MN062015A	20200085
11	Charge	1/27/2015	609.52.2(a)(3) Theft-False Representation	Felony	U1129	X	MN062015A	20200085
	Penalty	1/27/2015	609.52.3(1) Theft-Firearm or Property Value Over \$35,000	Felony	U1129	X	MN062015A	20200085
	Modifier	1/27/2015	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1129	X	MN062015A	20200085