

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 33.CW04.0227
Court File No. 27-CR-25-610

State of Minnesota,
Plaintiff,

COMPLAINT
Summons

vs.

CHAVIS DUPREE WILLIS DOB: 06/27/1978

P.O. BOX 8441
Minneapolis, MN 55408

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: Racketeering

Minnesota Statute: 609.903.1, with reference to: 609.904.1

Maximum Sentence: Imprisonment for not more than 20 years or to payment of a fine of not more than \$1,000,000, or both.

Offense Level: Felony

Offense Date (on or about): 09/01/2017 to 12/07/2021

Control #(ICR#): 20190003

Charge Description: On or about warrant dates September 1, 2017 to December 7, 2021 in Hennepin County, Minnesota, Defendant, CHAVIS DUPREE WILLIS (DOB: 6/27/1978), was employed by or associated with an enterprise and intentionally conducted or participated in the affairs of the enterprise by participating in a pattern of criminal activity.

COUNT II

Charge: Theft by Swindle (over \$35,000)

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(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): 06/08/2021 to 12/07/2021

Control #(ICR#): 20190003

Charge Description: On or about warrant dates June 8, 2021 to December 7, 2021 in Hennepin County, Minnesota, Defendant CHAVIS DUPREE WILLIS (DOB: 6/27/1978), obtained property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property obtained as a result of the swindle was \$1,736,027.14.

COUNT III

Charge: Theft by Swindle (over \$35,000)

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(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): 12/08/2020 to 05/25/2021

Control #(ICR#): 20190003

Charge Description: On or about warrant dates December 8, 2020 to May 25, 2021 in Hennepin County, Minnesota, Defendant CHAVIS DUPREE WILLIS (DOB: 6/27/1978), obtained property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property obtained as a result of the swindle was \$1,701,060.97.

COUNT IV

Charge: Theft by Swindle (over \$35,000)

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(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): 05/27/2020 to 11/24/2020

Control #(ICR#): 20190003

Charge Description: On or about warrant dates May 27, 2020 to November 24, 2020 in Hennepin County, Minnesota, Defendant CHAVIS DUPREE WILLIS (DOB: 6/27/1978), obtained property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property obtained as a result of the swindle was \$2,483,577.15.

COUNT V

Charge: Theft by Swindle (over \$35,000)

Minnesota Statute: 609.52.2(a)(4), with reference to: 609.52.3(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): 01/22/2020 to 05/12/2020

Control #(ICR#): 20190003

Charge Description: On or about warrant dates January 22, 2020 to May 12, 2020 in Hennepin County, Minnesota, Defendant CHAVIS DUPREE WILLIS (DOB: 6/27/1978), obtained property from another person by swindling, whether by artifice or trick, device, or any other means, and the value of the property obtained as a result of the swindle was \$1,450,295.88.

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your affiant, Sarah Levine, is a Lead Investigator with the Minnesota Medicaid Fraud Control Unit (MFCU) of the Minnesota Attorney General's Office. As an investigator for the MFCU, I investigate allegations of fraud committed by health care providers enrolled in the Minnesota Medical Assistance Program (Medicaid). I have reviewed the MFCU's investigation of CHAVIS DUPREE WILLIS (DOB 6/27/1978) and his business, 1-0 Granny's Helpful Hands, LLC (Granny's). The MFCU determined that WILLIS engaged in a multi-year scheme to defraud the Minnesota Department of Human Services (DHS).

WILLIS's scheme involved him owning and managing Granny's for several years despite being prohibited from doing so due to his criminal history. WILLIS knew that his prior conviction for aiding and abetting second-degree murder prohibited him from owning and managing Granny's, so he concealed his involvement with the business. WILLIS repeatedly and falsely represented to DHS that his mother, Raynell Finn (Finn), owned Granny's. He went so far as to impersonate Finn during phone calls with DHS and he forged Finn's name on documents he submitted to DHS. Finn lived in California and by all accounts was not involved with owning or operating Granny's.

WILLIS also hired Kathryn Koelfgen (Koelfgen) to work as the biller and administrator at Granny's despite Koelfgen being prohibited from doing so due to her criminal history. WILLIS and Koelfgen were in a romantic relationship. Prior to working for Granny's, Koelfgen was convicted of Felony Identity Theft and Felony Aiding an Offender. While working at Granny's, Koelfgen was again convicted of Felony Identity Theft and was sentenced to the workhouse. WILLIS proceeded to impersonate his mother during phone calls with corrections officials so that Koelfgen could get furloughs and continue working at Granny's. Based on its investigation, the MFCU determined that Koelfgen billed DHS for services that were not provided at Granny's and stole the identities of Granny's employees as part of a loan fraud scheme. WILLIS found out about some of Koelfgen's billing fraud, but he allowed her to continue working at Granny's anyways.

As a result of WILLIS's scheme, DHS paid a total of \$7,370,961.14 in Medicaid funds to Granny's.

I. THE MEDICAID PROGRAM

The Medicaid program provides medical care and services to Minnesotans who meet income and other eligibility requirements (recipients). The Minnesota Department of Human Services (DHS) administers the Medicaid program. 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, in what is known as "fee for service" billing.

Medicaid covers personal care assistance services, which include assistance with activities of daily living like dressing, grooming, bathing, eating, mobility, and toileting. A recipient who qualifies for personal care assistance services may hire a personal care assistance provider agency to furnish those services. DHS enrolls PCA provider agencies who hire or contract with personal care assistants (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.

DHS also enrolls and licenses Home and Community-Based Services ("HCBS") agencies to furnish health care services to Medicaid recipients. HCBS are Medicaid-funded services that provide assistance and support for persons with disabilities who live independently in the community.

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.

The Manual is available to providers electronically, and updates occur on a continuous basis. DHS also issues bulletins to clarify existing laws and regulations and to summarize any changes. DHS further explains MHCP laws and regulations during a three-day training program called “Steps for Success.” PCA provider agency owners and managing employees must attend Steps for Success before enrolling in MHCP. DHS also offers a “PCA Billing Lab” which teaches PCA provider agencies how to properly bill claims to DHS. As part of their enrollment in MHCP, providers agree to comply with all rules relating to the delivery of Medicaid services to their recipients and the submission of claims for such services, including the rules set forth in the Manual.

To enroll in the Medicaid program, PCA provider agencies and HCBS agencies are required to disclose all of their owners and managing employees to DHS. Enrolled PCA provider agencies must also initiate background studies for all of their owners, managing employees, and PCAs. Managing employees include, but are not limited to, general managers, business managers, administrators, or other individuals who exercise operational or managerial control over the agency. Enrolled agencies initiate background studies by having the individual fill out a request form, and the agency then submits the form to DHS. If the individual is disqualified, the agency receives a notice. Notice is also sent to the individual, stating that he or she is disqualified.

Certain criminal convictions result in a DHS disqualification. Under Minnesota law, an individual is permanently disqualified if they were convicted of aiding and abetting second-degree murder. An individual is disqualified for 15 years if they were convicted of identity theft and aiding an offender.

Only enrolled PCA provider agencies can bill and provide services to Medicaid recipients. A PCA provider agency is barred from enrolling in MHCP if it has not initiated background studies for its owners or managing employees or if any of its owners or managing employees are disqualified and have not received a “set aside.” Under Minnesota law, the Commissioner of DHS may “set aside” a disqualification if the Commissioner finds that the individual has submitted sufficient information to demonstrate that the individual does not pose a risk of harm to any person served by the provider agency.

II. GRANNY’S ORGANIZATIONAL STRUCTURE

Granny’s enrolled with DHS to be a PCA provider agency in 2012, and was operated out of an office located at 705 East Lake Street in Minneapolis. Granny’s was also enrolled with DHS to provide HCBS services. In documents submitted by Granny’s to DHS, Raynell Finn (Finn) is consistently listed as the sole owner of Granny’s. In addition, Granny’s submitted multiple Provider Agreements to DHS that are purportedly signed by Finn and acknowledge Finn’s responsibility to fully disclose all of Granny’s owners and controlling individuals. Through its investigation, the MFCU learned that Finn is merely the owner of Granny’s “on paper,” and that she resides in California and had virtually no involvement with Granny’s. Rather, Finn’s son, CHAVIS DUPREE WILLIS (WILLIS) was the true owner and manager of Granny’s.

As noted earlier, PCA provider and HCBS agencies are required to disclose their owners and managing employees to DHS. In addition, PCA provider agencies that have not submitted background study requests to DHS for their owners and managing employees are barred from enrolling in the Medicaid program, providing services to Medicaid recipients, and billing the Medicaid program. Records from DHS indicate that Granny’s never submitted a background study request for WILLIS. Nor did Granny’s ever disclose WILLIS as an owner or managing employee. DHS records also indicate that WILLIS never

completed the training that is required for owners and managers of PCA provider agencies.

III. WILLIS OWNED AND MANAGED GRANNY'S DESPITE BEING PROHIBITED FROM DOING SO DUE TO HIS CRIMINAL HISTORY.

A. WILLIS's disqualifying murder conviction.

On November 7, 2000, Willis was convicted in Ramsey County of aiding and abetting second-degree murder. This conviction permanently disqualifies him from owning or managing a PCA provider agency. In an email to an investigator, WILLIS acknowledged having a criminal history and said that his involvement with Granny's was "fiduciary in nature." He also said that his mother, Finn, has dementia and was "living in California as a[n] absentee owner." He further stated that pursuant to an agreement a company called Step Forward managed the day-to-day operations of Granny's. The MFCU requested an interview with WILLIS, but he refused.

Contrary to WILLIS's assertions, the MFCU determined that WILLIS was the true owner of Granny's and was highly involved in the company's day-to-day operations. As detailed below, employees identified WILLIS as the owner of Granny's. He also controlled Granny's bank accounts, hired and fired staff, and text messages show that he viewed himself as the owner and operator of Granny's.

B. Employees identified WILLIS as the owner and manager of Granny's.

Investigators spoke with several Granny's employees who identified WILLIS as the owner of Granny's and described him as being involved in the businesses' day-to-day operations.

Victoria Baker-Brockberg told investigators that she worked at Granny's from January 4, 2021 to April or May of 2022. Her job title was Human Resources Coordinator. Baker-Brockberg told investigators that WILLIS was the owner of Granny's and was "upper, upper, upper management." Baker-Brockberg said that she took over payroll after Kathryn Koelfgen was fired from Granny's by WILLIS, and that she sent payroll to WILLIS for approval. Baker-Brockberg also said that WILLIS's mom, Raynell Finn, was collecting a salary from Granny's, but that Finn lived in California. Baker-Brockberg could not identify what work Finn did for Granny's.

Kathryn Koelfgen told MFCU investigators that she worked at Granny's from 2017 until 2021. Koelfgen said that she was romantically involved with WILLIS, that WILLIS hired her to work at Granny's, and that WILLIS was the owner of the company. Koelfgen said that her job duties included billing and entering payroll, and that she would send payroll to WILLIS for approval. Koelfgen further stated that WILLIS did not want anyone to know that he was the owner of Granny's "because of his background." Koelfgen said that the company was in WILLIS'S mom's name, but that WILLIS was the actual owner.

The MFCU also interviewed former Granny's employee Brittany McMillen. McMillen said that she worked at Granny's beginning in either 2014 or 2015. McMillen said that WILLIS hired her to work at Granny's, that WILLIS was the owner of the company, and that WILLIS was in the office a lot. McMillen described WILLIS as being hands on at Granny's, and she also said that WILLIS had the authority to hire and fire people. McMillen said that Raynell Finn is the "actual owner" of Granny's, but McMillen only met Finn one time at Granny's office when Finn was in town.

Investigators also interviewed former Granny's employee Haley Good. Good worked at Granny's briefly in 2018. Good said that Koelfgen hired her to work at Granny's, that Koelfgen reported to WILLIS, and that WILLIS was the owner of the company. Good said that she worked in the office, where she scanned bank

and tax records, and filed and organized other documents. Good said that she took direction in the office from both Koelfgen and WILLIS.

C. WILLIS's text messages show that he owned and managed Granny's.

During the MFCU's investigation multiple Granny's employees indicated that WILLIS and a woman named Robin Stepney were business partners. DHS provider enrollment documents list Robin Stepney as a managing employee and owner of Step Forward, which was also a Medicaid provider. Documents from DHS show that Granny's and Step Forward shared a mailing address of 705 East Lake Street in Minneapolis, and the entities also shared Federal Employer ID and Minnesota Tax ID numbers. Former Granny's employee Victoria Baker-Brockberg told investigators, "Step Forward is Robin's company. Granny's is um, [WILLIS's] company." Kathryn Koelfgen told investigators that Stepney owned Step Forward, but that Step Forward's billing was done through Granny's.

During its investigation, the MFCU obtained Stepney's cell phone. WILLIS and Stepney frequently communicated about Granny's via text message, and their exchanges confirm that WILLIS owned and managed the operations of Granny's. For instance, in July 2019, WILLIS wrote Stepney the following, "Robin I been a business owner for 10 years before you, don't ever get it confused, I'm going to run my business and handle my business with or without you around." In December 2020 WILLIS wrote Stepney a message that read, in part, "I'm team Granny's, I will always do what's best for this business, has nothing to do with you, Katie, or anyone else, I want my business ran a specific way, not predicated on what you believe or think..."

Text messages also show that WILLIS made financial decisions for Granny's. For example, in November 2019, WILLIS wrote Stepney a message that read, in part, "I spent my money on upgrading the building because I'm getting ready to do an appraisal and I have to refinance out of the contract for deed in the next 12 months, and once the appraisal comes back to where I need it to, I will then pull the equity out of the building and buy a commercial business for Granny's, I don't want to stay on Lake St and pay 3k a month for a [sic] office space when I could own the building and have tenants in it, and have Granny's in the building and obtain a 1million [sic] asset..."

Text messages confirm that WILLIS made hiring decisions for Granny's. For example, in November 2020 WILLIS and Stepney discussed hiring a candidate to work in Human Resources. WILLIS wrote Stepney, "Offer her the job at 55k plus benefits, I think she will be a good addition to the new 2021 version of Granny's."

Text messages also confirm that WILLIS oversaw Granny's payroll. For example, in June of 2017, WILLIS texted Stepney "I can transfer 7500-8k out of the residential to cover my payroll tomorrow and replace it back into the residential on weds[.]" In May of 2021, WILLIS texted Stepney, "Robin I'm doing payroll and going through timesheets." In June of 2021, Willis texted Stepney a message that read, in part: "I have to work the office and do payroll, you will have to go. I have payroll and re assessments to do."

WILLIS also made decisions about workplace policies and procedures at Granny's. For example, in August 2019 WILLIS texted Stepney, in part, "[I]f we are going to continue to be business partners, I want you on the same page as me, I want policy, I want efficiency on all levels, I want processes implemented and employees trained thoroughly, employee manuals updated to reflect the new processes, I'm not going to sit back and keep allowing this business to be ran like this..."

Finally, WILLIS and Stepney also frequently discussed sharing profits. For example, in March 2019, WILLIS wrote Stepney, "Heads up, next week I'm cutting dividends, should be right around 60k a piece again." In August of 2019, WILLIS wrote, in part "we are due 30k for dividends, I'm budgeting the account

for office furniture and client furniture...” In April 2020, Stepney wrote to WILLIS, “Also I checked my accounts and no money was added last cycle. Just checking that you didn’t deposit dividends.” To this WILLIS responded, “No I didn’t, forgot honestly, will do dividends this weds on pay day, it should close [sic] to 100k.”

D. Bank records show that Willis owned Granny’s.

As part of its investigation, the MFCU executed a search warrant on Granny’s bank accounts at Royal Credit Union (Royal). The records obtained show that WILLIS owned and controlled Granny’s bank accounts. WILLIS signed several Royal forms certifying: (1) that he was "authorized to execute documents, checks, withdrawal orders, or any other instrument" on behalf of Granny’s, and (2) that he was an “authorized officer, general partner, managing or authorized member or owner” of Granny’s.

A Royal credit application signed by WILLIS in 2015 lists WILLIS’S employer as Granny’s, his job title as Manager, and his employment status as full time. In July 2017, WILLIS signed an ATM/Debit Card application at Royal. The business name on the card is Granny’s Helpful Hands, LLC and WILLIS is listed as the sole authorized signer for the card. In August 2017, WILLIS signed a Royal form listing himself as Granny’s Business Administrator and the owner or officer of Granny’s. WILLIS was also authorized to make wire transfers of money out of Granny’s checking account.

Records from Royal also show regular and significant transfers of money from Granny’s checking account into WILLIS’S personal checking. For example, for the month of September 2017 a total of \$10,800 was transferred into WILLIS’S checking account from Granny’s checking account. For the month of July 2018, a total of \$16,160 was transferred into Willis’s bank account from Granny’s checking account. For the month of June 2019, a total of \$30,776 was transferred into WILLIS’S personal account from Granny’s checking account.

These transfers were in addition to the salary that WILLIS collected from Granny’s. WILLIS’S pre-tax salary at Granny’s was \$1,923.08 weekly or approximately \$100,000 per year. His salary at Granny’s was roughly the same as the salary of his mother, Raynell Finn, who by all accounts did not do any work for Granny’s. A review of bank and payroll records shows that between September 1, 2017, and December 10, 2021, a combined total of at least \$769,157.05 from Granny’s was deposited into WILLIS’S personal checking account at Royal.

In November 2021, after the MFCU executed a search warrant at Granny’s office on Lake Street, WILLIS signed a form removing himself as a signer for Granny’s bank accounts at Royal.

E. WILLIS impersonated his mother as part of his scheme.

Granny’s never disclosed to DHS that WILLIS owned and managed the company, and WILLIS took additional steps conceal his involvement with Granny’s. Former Granny’s employee Brittany McMillen said that WILLIS would call DHS and impersonate his mother. McMillen said she was present during one such call. Former Granny’s employee Kathryn Koelfgen said that WILLIS forged his mother’s signature on documents that were submitted to DHS and signed his mother’s name on business checks. Koelfgen also said that WILLIS impersonated his mother during phone calls. Koelfgen said that she was sentenced to the workhouse while working for Granny’s, but that WILLIS impersonated his mother during phone calls with corrections officials to help Koelfgen get furloughs to continue working at Granny’s.

IV. WILLIS HIRED KATHRYN KOELFGEN TO DO BILLING, PAYROLL, AND OTHER MANAGERIAL WORK FOR GRANNY'S DESPITE THE FACT THAT KOELFGEN WAS PROHIBITED FROM WORKING IN THIS ROLE DUE TO HER CRIMINAL CONVICTIONS.

Kathryn Koelfgen told the MFCU that she worked for Granny's from 2017 to 2021. A form obtained from Koelfgen's employment file lists her termination date as March 30, 2021, and her job title as "Administrator." As noted earlier, WILLIS hired Koelfgen. She said that her job duties included submitting billing information and timesheets to a company called Cashé, who would then use the information provided by Koelfgen to submit Granny's billings to DHS for payment. Koelfgen said that she also prepared Granny's payroll, answered employee and client questions at the office, maintained client files, and submitted paperwork to DHS. Koelfgen admitted to investigators that she billed for services that were not provided at Granny's. She said that WILLIS was aware of some of her billing fraud, and that he allowed her to continue working at Granny's for a couple of years after it was first brought to his attention.

Koelfgen told MFCU investigators that she has prior convictions related to stealing peoples' identities and opening credit cards. She said that she knew she was not supposed to be working at Granny's due to her prior convictions, but that WILLIS knew about her convictions and allowed her to work at Granny's anyway. Prior to working at Granny's, Koelfgen was convicted in 2010 of Felony Identity theft and in 2015 of Felony Aiding an Offender. As noted earlier, these crimes carry a 15-year DHS disqualification. While working at Granny's, Koelfgen continued to commit disqualifying crimes. In 2017 and again in 2019 she was convicted of Felony Identity Theft. As noted earlier, Koelfgen said that WILLIS impersonated his mother to help Koelfgen get furloughs from the workhouse so that she could continue to work and bill at Granny's.

Records from DHS indicate that Granny's submitted a background study request for Koelfgen in 2018, that DHS determined Koelfgen was disqualified from working at Granny's, and that the disqualification was not set aside. Granny's was notified by U.S. mail and email about Koelfgen's disqualification. As noted earlier, a PCA provider agency is barred from enrolling in MHCP if it has not initiated background studies for its owners or managing employees or if any of its owners or managing employees are disqualified and have not received a "set aside." Nevertheless, WILLIS permitted Koelfgen to work at Granny's for several years.

V. GRANNY'S BILLED AND RECEIVED MEDICAID FUNDS FOR SERVICES THAT WERE NOT PROVIDED.

In an interview, Koelfgen told the MFCU that Granny's billed for services that were not provided. As noted earlier, Koelfgen worked in Granny's office and her job duties included collecting employee timesheets and submitting the timesheets for billing. Koelfgen said that some Granny's employees would report working for recipients at group homes owned by Granny's and report working for Granny's PCA recipients at other locations during the same times. Koelfgen also said that some Granny's PCA employees would split their paychecks with recipients, and that this indicated that services were not actually being provided. Koelfgen said that WILLIS was aware that this fraud was happening at Granny's.

In an interview, former Granny's employee Victoria Baker-Brockberg said that WILLIS fired Koelfgen for falsifying payroll. Baker-Brockberg also said that she investigated Koelfgen and determined that Koelfgen engaged in a scheme to take out loans in the names of employees who no longer worked at Granny's. Baker-Brockberg said that this scheme involved Koelfgen falsifying payroll information and then using the fake wages to payback the fraudulently obtained loans.

As part of its investigation into WILLIS and Granny's, the MFCU charged Koelfgen with Felony Identity Theft and Felony Theft By False Representation in Hennepin County Court File No.: 27-CR-24-6229. As detailed in the criminal complaint against Koelfgen, the MFCU determined that Koelfgen used her position at Granny's to steal the identities of employees, used the stolen identities to fraudulently take out 19

personal loans, and she pocketed the stolen loan proceeds.

In addition to committing loan fraud, Koelfgen also defrauded the Medicaid program by billing for PCA services that were not provided by Granny's employees between February 15, 2018 and June 24, 2020. Based on its investigation, the MFCU determined that former Granny's employee J.K stopped working at Granny's on February 2, 2018. Nevertheless, Koelfgen continued to bill the Medicaid program as though J.K. was working as a PCA at Granny's from February 15, 2018 to June 24, 2020. As a result of this scheme, DHS paid out \$20,493.60 in Medicaid funds.

The MFCU determined that former granny's employee A.J's stopped working at Granny's ended prior to May 2018. Nevertheless, Koelfgen continued to bill the Medicaid program as though A.J. was working at Granny's from May 1, 2018 to June 6, 2018. As a result of this scheme, DHS paid out \$1,635.60 in Medicaid funds.

Finally, the MFCU determined that DHS paid out \$20,201.40 in Medicaid funds for services that Koelfgen fraudulently billed using the identity of former Granny's employee H.G. In an interview, H.G. told an investigator that she worked in the office, where she scanned bank and tax records, and filed and organized other documents. H.G. stated that she only worked at Granny's for a few weeks, and payroll records support H.G.'s claim that her employment at Granny's was very brief. H.G. received a total of 6 weekly paychecks from September 7, 2018 to October 19, 2018. Claims data from DHS, however, shows that Koelfgen billed the Medicaid program as though H.G. provided PCA services from October 4, 2018 to June 24, 2019. H.G. did not provide these PCA services. As noted earlier, H.G. only worked at Granny's for a few weeks and she said that her duties were clerical. As a result of this scheme, DHS paid out \$20,201.40 in Medicaid funds.

Koelfgen said that WILLIS was aware of some of her billing fraud, but that he allowed her to continue working at Granny's anyways. On October 7, 2024, Koelfgen pled guilty to one count of Theft By False Representation (over \$5,000).

V. CONCLUSION

In sum, WILLIS engaged in a multi-year scheme to steal Medicaid funds from the Minnesota Department of Human Services (DHS). He owned and managed Granny's despite being prohibited from doing so due to his conviction for aiding and abetting second-degree murder. To accomplish his scheme, he concealed his identity and true involvement with Granny's from DHS. He omitted his name from paperwork that was submitted to DHS, forged his mother's name on documents, and he even went as far as to pretend to be his mother during phone calls with DHS.

WILLIS also hired Kathryn Koelfgen to work as the biller and administrator at Granny's for several years despite WILLIS knowing about Koelfgen's disqualifying criminal history. After being hired by WILLIS, Koelfgen continued to commit disqualifying crimes. She billed the Medicaid program for services that were not provided and stole the identities of Granny's employees as part of a loan fraud scheme. WILLIS was aware of some of Koelfgen's billing fraud, but he allowed her to continue working at Granny's anyways.

As a result of WILLIS'S scheme, DHS paid a total of \$7,370,961.14 in Medicaid funds to Granny's. I aggregated WILLIS'S fraud into charging periods as listed below.

Count	Dates	Theft Amount
2	6/8/2021 to 12/7/2021	\$1,736,027.14
3	12/08/2020 to 5/25/2021	\$1,701,060.97
4	5/27/2020 to 11/24/2020	\$2,483,557.15
5	1/22/2020 to 5/12/2020	\$1,450,295.88
Total		\$7,370,961.14

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

Sarah Levine
Lead Investigator
445 Minnesota Street
Suite 1400
St. Paul, MN 55101

Electronically Signed:
01/07/2025 11:32 AM
Ramsey 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) 296-3353

Electronically Signed:
01/07/2025 10:14 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 7, 2025.

Judicial Officer

Marta M. Chou
District Court Judge

Electronically Signed: 01/07/2025 11:35 AM

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

**COUNTY OF HENNEPIN
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Chavis Dupree Willis

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: Chavis Dupree Willis
DOB: 06/27/1978
Address: P.O. BOX 8441
Minneapolis, MN 55408

Alias Names/DOB:

SID:

Height:

Weight:

Eye Color:

Hair Color:

Gender: MALE

Race:

Fingerprints Required per Statute: Yes

Fingerprint match to Criminal History Record: No

Driver's License #:

Case Scheduling Information: Prosecutor not available for first appearance on the following dates:
1/31/25, 1/8/25-1/10/25, 1/13/25, 1/17/25,

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	9/1/2017	609.903.1 Racketeering-Crime	Felony	X1300		MN062015A	20190003
	Penalty	9/1/2017	609.904.1 Racketeering-Penalty	Felony	X1300		MN062015A	20190003
2	Charge	6/8/2021	609.52.2(a)(4) Theft-By Swindle	Felony	U1069		MN062015A	20190003
	Penalty	6/8/2021	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1069		MN062015A	20190003
3	Charge	12/8/2020	609.52.2(a)(4) Theft-By Swindle	Felony	U1069		MN062015A	20190003
	Penalty	12/8/2020	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1069		MN062015A	20190003
4	Charge	5/27/2020	609.52.2(a)(4) Theft-By Swindle	Felony	U1069		MN062015A	20190003
	Penalty	5/27/2020	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1069		MN062015A	20190003
5	Charge	1/22/2020	609.52.2(a)(4) Theft-By Swindle	Felony	U1069		MN062015A	20190003
	Penalty	1/22/2020	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	U1069		MN062015A	20190003